

# Modern Slavery Statement



Date: 16 December 2025



# Contents

Reporting Entity & Structure.....	3
Operations & Supply Chain .....	3
Risk Assessment.....	3
Corrective Action.....	3
Remedy Pathway.....	4
<b>Supporting Policies &amp; Procedures.....</b>	<b>6</b>
Procurement Process   Review.....	6
Supplier Contracts   Review.....	6
Whistleblower Policy   Review.....	6
Code of Conduct   Review.....	6
EEO and Diversity Policy   Review.....	6
Workplace Health and Safety Policy   Review.....	6
Assessing Effectiveness.....	6
Continual Development.....	6
Our Actions & Future Commitments.....	7
Consultation.....	8
<b>Approval.....</b>	<b>8</b>



## Introduction

This is Cadence's Modern Slavery Statement (Statement) for the financial year ended 30 June 2025 (FY25). This Statement sets out the measures Cadence has taken to identify, manage and mitigate the risk of modern slavery practices in our operations and supply chain and to maintain a responsible and transparent supply chain.

At Cadence, we are committed to respecting and upholding human rights across our business operations and supply chains. As we continue to develop our approach to effectively managing modern slavery risks, we are taking proactive steps to ensure that our practices align with this commitment.

Our goal is to build a comprehensive framework that includes education, risk assessment, and processes to address potential risks. We are focused on deepening our knowledge of modern slavery issues, as well as assessing where risks may arise within our operations and supply chain. This will enable us to take informed actions to prevent exploitation, coercion, and worker abuse. As we continue to grow, we are committed to refining our approach to modern slavery, ensuring that we assess and address these risks effectively at every stage of our business.

### Reporting Entity & Structure

Cadence Property Group Consolidated Pty Ltd (Cadence) is the head entity of a broader corporate group comprising various companies, trusts, and partnerships. Cadence has been identified as the 'reporting entity' for the purposes of this Modern Slavery Statement. This Statement covers Cadence and all entities that it owns or controls, including operating subsidiaries and commonly owned entities within the Cadence Property Group.

### Operations & Supply Chain

Cadence primarily engages in property development and investment activities, which require partnerships with various suppliers, construction companies, professionals, and subcontractors. While our business currently operates within Australia, we recognise that some areas of our supply chain may carry potential modern slavery risks, particularly through subcontractors or suppliers who engage with industries or jurisdictions that are higher risk.

At this stage, our primary construction partner is Texco Group Pty Ltd (Texco), who provide us with a Modern Slavery Statement as part of our collaboration. We also work with a select group of other suppliers and subcontractors, many of whom are small to medium enterprises. We acknowledge the importance of working closely with these partners to understand and mitigate any risks of modern slavery in our operations.

We have begun taking steps to incorporate modern slavery risk assessments into our procurement processes, ensuring we consider factors such as compliance with relevant laws, health and safety standards, and ethical sourcing.

### Risk Assessment

Cadence has started the process of reviewing our supply chain for potential risks. While this is an evolving process, we are focusing on suppliers and subcontractors based on factors such as the industries they operate in, the countries they work with, and the nature of their workforce. We currently assess risk by looking at:

- The type of product or service provided
- The jurisdiction and countries of operation
- The complexity of the supply chain
- The use of vulnerable workers

Our risk management procedures are always developing and we are committed to refining these processes over time to ensure a more thorough and detailed assessment in future reporting periods.

### Corrective Action

We are committed to taking action should we identify any high risks within our supply chain. The corrective actions we will implement include:

- Reviewing the identified risks and discussing potential actions with the relevant supplier or subcontractor
- Assessing whether changes can be made to mitigate risks
- Where appropriate, seeking alternative suppliers or subcontractors if risks cannot be adequately addressed



Additionally, we are focusing on due diligence practices, including risk management, updated procurement processes, and internal policies, to support our efforts to combat modern slavery. As part of this effort, we have run awareness programs and training for employees on modern slavery risks and best practices.

Should a high risk of modern slavery may be identified in our operations or supply chain then the following action will be undertaken:

- Conduct a review of the risk identified and confirm that the rating of 'high' is appropriate
- Where appropriate, confer with the relevant supplier, professional or subcontractor to discuss the risk identified and if there is action they can or have already taken to reduce this risk. In addition they may be able to offer further information which clarifies why the risk may actually be lower than our assessed level
- If the supplier, professional or subcontractor is able to demonstrate the risk is not high, then continue to monitor the situation however if the risk remains high, then the commercial relationship with the external party should be terminated
- Should it not be appropriate or possible to confer with the supplier, professional or subcontractor, determine suitable alternative suppliers, professionals or subcontractors who could be appointed in place of the current high risk supplier, professional and subcontractor

Other than the above response to high risks of modern slavery, the following actions are ongoing actions which continue to ensure Cadence exercises due diligence in relation to modern slavery:

Risk Management	Policies and Procedures	Procurement	Training and Awareness
<p>As noted in the "Risk Assessment" section of this Statement, we will prioritise a desktop review of Tier 1 suppliers and subcontractors (remaining tiers to follow) to assess the risk of modern slavery in our supply chains to develop high, medium and low risk vendor categories which will form the basis of further reviews and due diligence/audit requirements.</p>	<p>Continually review key policies and procedures to assess, monitor and reduce the risk of modern slavery in our operations and supply chain.</p>	<p>Cadence have introduced a question in all new supplier onboarding forms in relation to modern slavery.</p> <p>We continue to monitor best practice questionnaire and intend on implementing a questionnaire for existing and new vendors, asking them about their approaches and measures to prevent and mitigate modern slavery and human rights abuses in their operations and supply chains.</p>	<p>Run modern slavery awareness training for existing and new employees and, where appropriate, consider making such training available to suppliers and subcontractors.</p>

**Remedy Pathway**

Cadence is committed to responding quickly and appropriately to any suspected or actual instance of modern slavery connected to our operations or supply chain. Our remedy pathway is designed to prioritise the safety and wellbeing of affected people, while also ensuring that we work constructively with our suppliers, professionals and subcontractors to address root causes and prevent recurrence.

This pathway applies to Cadence's own workforce and to workers employed by our suppliers, construction partners, and subcontractors engaged on our projects in Australia, recognising that some goods and services may involve overseas supply chains.

**Reporting and raising concerns**

We encourage our people and anyone in our supply chain to speak up if they have concerns about potential modern slavery or related human rights abuses. Concerns may be raised through:

- line managers or senior leadership;
- relevant project or procurement contacts; or
- Cadence's Whistleblower Policy, which allows anonymous reporting of incidents, including those related to modern slavery.



- Where appropriate, we also expect our key suppliers and construction partners to provide their own internal channels for workers to raise concerns, and to notify Cadence promptly if an issue is identified that relates to our projects or supply chain.

### **Initial assessment and escalation**

When a concern is raised, Cadence will:

- acknowledge receipt of the concern and, where possible, confirm next steps with the person raising it;
- promptly review the information available, seeking further detail where needed;
- assess the potential risk to people and the seriousness of the allegation; and
- determine Cadence's connection to the situation (for example, whether it relates to our own operations, a direct supplier, or deeper in the supply chain).

Serious or credible allegations will be escalated to senior leadership and, where appropriate, to the Advisory Board for oversight as part of our broader modern slavery governance and risk management processes.

### **Protecting and supporting affected people**

Our first priority is the safety, protection and dignity of affected workers. Where an incident of modern slavery or serious exploitation is suspected or confirmed, Cadence will seek to:

- work with the supplier or head contractor to ensure the immediate safety of affected workers and remove them from any harmful situation;
- ensure there is no retaliation against any person who raised or assisted with the concern; and
- support access to appropriate assistance, which may include referrals to specialist external organisations or services.

Where feasible and appropriate, and in collaboration with our suppliers and relevant experts or authorities, Cadence will also seek to pursue remedy outcomes such as:

- payment of unpaid wages or other entitlements;
- reimbursement of unlawful recruitment or other fees;
- adjustments to working conditions; or
- support for relocation or safe return, where this is in the best interests of affected workers.

### **Working with suppliers and partners on corrective action**

Alongside supporting affected workers, we will work with the relevant supplier, professional or subcontractor to understand the causes of the issue and agree a corrective action plan. This may include:

- requiring the supplier to investigate the circumstances and report back on findings;
- requiring specific remediation steps (for example, changes to recruitment practices, supervision, or subcontracting arrangements);
- strengthening contractual expectations and ongoing monitoring; and
- where risks remain unacceptably high or the supplier is unwilling or unable to address them, suspending or terminating the commercial relationship and seeking alternative suppliers.

We leverage our relationships with key partners, including Texco as our primary construction partner, to support effective remediation and improved practices in the parts of the supply chain they manage on our behalf.

### **Learning and continuous improvement**

All substantiated concerns and incidents will be recorded and reviewed as part of our broader modern slavery program. Insights from these reviews will be used to:

- refine our risk assessment model and supplier due diligence;
- inform updates to policies, procedures and contract templates;
- shape future training and awareness activities for employees and suppliers; and
- measure the effectiveness of our actions over time.



## Supporting Policies & Procedures

### Procurement Process

The Procurement process sets out the steps employees are required to follow in the acquisition of goods and services. We have also developed tools and templates for employees.

Managing agents (under a Property Management Agreement) are required to complete risk assessments (as required) of existing and new suppliers, professionals and subcontractors

### Supplier Contracts

Wherever possible, we seek to include contractual terms in our supply and service contracts to monitor for and prevent modern slavery. These contractual terms ensure suppliers comply with our relevant policies, are obliged to take reasonable steps to ensure that there is no modern slavery in their own operations or supply chain and must notify Cadence if they become aware of any breaches.

### Whistleblower Policy

We are committed to acting on any suspicion of modern slavery, as well as when actual incidents are identified. Our Whistleblower Policy allows for anonymous reporting of incidents including those related to modern slavery. Any person who suspects or believes there is any incident, practice or conduct of modern slavery in any part of our operations or supply chains will be able to notify us via one of the contacts listed in the Whistleblower policy.

### Code of Conduct

Our Code of Conduct is published on our intranet and reviewed once every three years.

### EEO and Diversity Policy

Equality, diversity and inclusion are at the heart of our business and ingrained in our values. Our commitment is to lead the way in diversity and inclusion for the benefit of our industry and our broader community. We also strive to build a society free of prejudice and racism, where difference is celebrated and valued, and everyone has equal opportunities. These values underpin our commitment to work with our suppliers, professionals and subcontractors to eradicate modern slavery practices.

### Workplace Health and Safety Policy

We are committed to managing our projects in a manner that complies with the highest standards of health and safety prescribed by legislation, associated regulations, codes of practice, Australian standards, and other requirements to protect the health and safety of all employees and outsourced personnel.

### Assessing Effectiveness

We are committed to actively managing our potential modern slavery risks and monitoring the effectiveness of our risk management and compliance processes surrounding modern slavery.

Our review process will continue to analyse the outputs from the various reporting mechanisms that we put in place. We will use those insights to assess, update and modify our program so that its effectiveness is continually strengthened, and it remains relevant and fit for purpose.

All of our company policies are subject to periodic review. The review includes consideration of any legislative or regulatory changes and new or updated standards or codes. We will also continue to look at feedback and reports from internal and external sources and will take steps to benchmark our policies against best practice.

### Continual Development

We will continue to monitor, review and improve the effectiveness of our modern slavery program and processes with our clients, suppliers, professionals and subcontractors.

Following the implementation of our committed actions, we will regularly undertake, and review the effectiveness, of our now-standard policies and procedures regarding compliance with the Act, being to:



- Engage all managing agents (under a Property Management Agreement) which requires the completion of risk assessments and audits (when required) of existing and new suppliers, professionals and subcontractors
- Require potential suppliers to formally disclose their Modern Slavery Statement as part of our procurement and contract administration processes;
- Continue to revise our policies and draft new policies where necessary, so we continue to reflect our commitment to combatting modern slavery in all its forms;
- Increase the number of employees and subcontractors (where appropriate) who are provided with dedicated training on modern slavery legislation;
- Regularly review and update our standard form contracts, new employee and EHS induction materials when and if required; and
- Facilitate an annual review process of our modern slavery risk management framework and processes with members of Senior Leadership and other relevant stakeholders.

Cadence is committed to continuously improving our understanding of modern slavery risks and refining our processes to address these issues as our capability grows. We will continue to assess the effectiveness of our measures and work collaboratively with our partners to mitigate modern slavery risks across our supply chain.

### **Our Actions & Future Commitments**

We will continue to review and strengthen our modern slavery program including the following key actions:

#### **Risk Assessment**

Continuing to undertake risk assessments to better understand the risks of modern slavery in our operations and supply chain, particularly in high-risk industries and geographies.

#### **Policy Development**

Reviewing and updating our policies outlining our commitment to preventing modern slavery and setting expectations for our suppliers and partners.

#### **Training and Education**

Provide targeted training and education to new employees equipping them with the knowledge to identify and address potential risks of modern slavery.

Expand training initiatives on modern slavery legislation and best practices for employees and subcontractors

#### **Employee Expectations**

Regularly reviewing and updating standard contract, employee and EHS induction materials.

#### **Engaging with Suppliers and Stakeholders**

Collaborating with suppliers, partners, and stakeholders to raise awareness of modern slavery risks and ensure they understand their obligations in preventing exploitation.

#### **Procedures**

Regularly reviewing and evolving procedures where required to ensure risks of modern slavery are being appropriately addressed

#### **Enhancing Due Diligence Processes**

We will strengthen our due diligence processes to ensure that our suppliers are aligned with our commitment to preventing modern slavery. This will include conducting desktop audits of suppliers to assess their adherence to ethical labour practices and to identify any potential risks of exploitation.

By taking these steps, we aim to build a robust foundation to prevent modern slavery and continuously improve our ability to assess, mitigate, and address risks as our business evolves.



## Consultation

This Statement has been developed by Cadence's People & Culture and Finance teams, with valuable input from our Senior Leadership Team and key operational departments. Cadence operates under a centralised management and governance model, whereby the same senior management team has oversight of, and responsibility for, compliance, risk management and operational decision-making across Cadence Property Group Consolidated Pty Ltd and all entities it owns or controls, including operating subsidiaries and commonly owned entities.

Accordingly, consultation in the preparation of this Statement occurred on a group-wide basis, with those senior leaders and functional teams acting on behalf of all owned and controlled entities. Throughout the preparation process, we engaged closely with internal stakeholders to build a clear understanding of our business activities and the nature of our supplier relationships. These consultations enabled us to map our supply chains more thoroughly, evaluate our operations for potential modern slavery risks, and strengthen the governance practices that support ethical and responsible conduct across the organisation. The insights gained through this collaborative approach have informed the development of this Statement and will continue to guide Cadence's ongoing commitment to continuous improvement in this area.

## Approval

This Modern Slavery Statement reflects our ongoing commitment to addressing modern slavery risks in our operations and supply chain. We will continue to assess, measure, and report on our progress in the coming years.

This Statement was approved by the principal governing body of the reporting entity, being the sole director of Cadence Property Group Consolidated Pty Ltd, on 16 December 2025.

Date: 16 December 2025

A handwritten signature in black ink, appearing to read 'Charles Buxton'.

**Charles Buxton**  
Director