

Modern Slavery Statement FY2023

Accord Property Holdings Pty Ltd



This statement is made pursuant to S.14 of the Modern Slavery Act 2018 (Cth)(Aust) by Accord Property Holdings Pty Limited, ABN 13 636 033 273 (Accord), for the period 1 July 2022 to 30 June 2023. This statement is applicable to Accord and each of its subsidiaries and associated entities.

Accord notes that during the 2023 Financial year, it did not qualify as a reporting entity, however is making this statement as Accord recognises the detrimental impact of Modern Slavery on vulnerable individuals and that we have a responsibility to recognise and respond to the risks of modern slavery in our operations and supply chains.

Accord Structure

Accord is an Australian property development and funds management company operating nationally, providing development and investment solutions across a range of sectors.

Accord is structured as a private company headquartered in Adelaide with offices in Perth, Melbourne and Brisbane. The business operates with a board made up of shareholders and an independent chairperson. The group has several subsidiaries and associated entities with common ownership and leadership. Currently the group employs around 30 staff across the four offices.

Accord Operations

Accord's day to day operations encompass acquiring properties, contracting builders to construct commercial premises and leasing developed properties to tenants. Additionally Accord operates a funds management and investment management arm, providing financial products to wholesale investors.

Accord People and Training

Accord maintains a zero-tolerance approach to any forms of modern slavery within our organisation. Accord only employs workers in Australia who are protected by stringent workplace and modern slavery legislation that seeks to minimise modern slavery risks.

Accord places a great emphasis on keeping staff up to date with professional development requirements and safety regulations to ensure that staff maintain high levels of integrity, honesty and diligence. Accord ensures our people are aware of the risks of modern slavery in our operations and supply chain.

Accord Supply Chain

Accord's supply chain is comprised of suppliers from a range of industries including construction and engineering, diversified financial services and professional services. These suppliers are predominantly located domestically throughout Australia.

Risks of Modern Slavery in our Operations and Supply Chain

Accord's initial review determined that the majority of our suppliers represent a low or medium risk of modern slavery. Our greatest risk of modern slavery in our supply chains is the use of external suppliers in the construction and engineering industry. Many of these suppliers use subcontractors which are traditionally more at risk of modern slavery. We expect our suppliers to maintain a high level of oversight on their use of subcontractors.

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Accord Policies

Accord's approach to modern slavery is made clear in our policies and procedures. We continue to assess and strengthen when necessary, any of our policies and processes to minimise the risk of human rights infringements anywhere in our national operations.

Our key policies and procedures outline the expectations of our staff and are regularly reviewed. Relevant policies include:

Moderns Slavery Policy which outlines the expectations of our staff, contractors and suppliers.

Code of Conduct which sets out what we expect of our employees and contractors.

Anti Money Laundering and Counter Terrorism Plan which dictates our procedures used to ensure we are not facilitating the use of proceeds of crime derived from criminal activity such as modern slavery.

Actions taken by Accord to assess and address Modern Slavery Risks

To date we have taken the following actions:

- Reviewed our key suppliers/creditors in our supply chain to identify high risk suppliers;
- Developed a Modern Slavery Policy;
- Developed a Modern Slavery Questionnaire that can be utilised to obtain additional information from our suppliers;
- Undertaken training with new and continuing staff members;
- Reviewed our policies and processes to identify and mitigate risks of modern slavery; and
- Included Modern Slavery specific clauses in new contracts with suppliers.

Looking ahead

We will be focusing on the following areas and the extent to which these are achievable within reason:

- Additional training for employees who are directly involved with high risk suppliers.
- Require as far as reasonably practicable, a requirement for all new large suppliers to complete the Modern Slavery Questionnaire.
- Working with our suppliers who are below the modern slavery reporting threshold to understand their approach to the risk of modern slavery.

Assessing the effectiveness of our Actions

In assessing the effectiveness of our actions we assess how effective our training has been, regularly review our internal policies and procedures and seek input from our advisors.

Consultation with entities Accord owns or controls

During the reporting period this statement covers, namely 1 July 2022 to 30 June 2023 the following entities have been actively engaged in the Modern Slavery discussions:

- Accord Property Partners Pty Ltd
- Accord Property Funds Management Pty Ltd
- Accord Property Development Fund Pty Ltd, and all associated Trusts
- Accord Property Enterprise Fund Pty Ltd
- Accord Property Pty Ltd
- Development Holdings Pty Ltd
- Accord Property Investments

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Each entity has common ownership and managed and have been involved in discussions regarding the details of the Modern Slavery Act 2018's reporting requirements and have had input into the Modern Slavery Policy and Statement. There is a consistent understanding of Accord's values and responsibilities regarding modern slavery across the organisation.

Accord Property Holdings Pty Ltd Modern Slavery Statement 2023

The Board of Accord Property Holdings Pty Ltd ABN 13 636 033 273 has approved this Statement on the 21st of March 2024

Signed by:

Lachlan Hogarth
Director Accord Property Holdings Pty Ltd
21/03/2024

Samuel Morris
Director Accord Property Holdings Pty Ltd
21/03/2024