# FY23 Modern Slavery Statement

For Financial Year ended 31 December 2023

# **Reporting Entity**

This statement is submitted under section 13 of the Modern Slavery Act 2018 (Cth) for Ascendas REIT Australia ABN 40 421 099 343 ("the Trust"). This Statement has been prepared by the Trustee, Perpetual Corporate Trust Limited ACN 000 341 533 and approved by the board of directors of the Trustee on 26<sup>th</sup> June 2024.

William Thomas Emerton

Director

Perpetual Corporate Trust Limited

## Consultation

The Trustee is required to, and did, consult with Ascendas Funds Management (Australia) Pty Ltd ("Investment Manager") to prepare this Statement for the Ascendas REIT Australia ("the Trust"). This statement was developed in consultation with the Investment Manager on a limited basis focusing namely on the tier one supply chain, which is appointments made directly by Ascendas REIT Australia. The Investment Manager largely directs the trustee on the various service appointments within any limitations of the Trust Agreement and/or applicable laws.

# Structure, Operations and Supply Chain

# Structure

The Trust is domiciled in Australia and has been in operation since 2015. The Trust invests in a number of underlying unit trusts ("Sub Trusts") with investment objectives to hold and generate rental income from investment properties. The Trust itself owns no real property and has no employees.

The Structure Diagram per *Appendix 2: Structure Diagram* shows that Ascendas REIT Australia is wholly owned by two unitholders in Singapore where the Trust holds units in four Mid Trusts and ultimately owns logistics and commercial properties located in Australia.

Since 31 December 2023, one logistic property in Sub Trust 4 and two logistic properties in Sub Trust 7 were divested via sale contracts, with settlement taking place on 27 February 2024.

# **Operations**

The primary operation of the Trust is the investment in various Sub Trusts. The Sub Trusts invest in underlying Property Trusts that ultimately own a portfolio of logistics and commercial investment properties in multiple locations across Australia. Perpetual Limited's division Perpetual Corporate Trust is the trustee for Ascendas REIT Australia and is a wholly owned subsidiary of Perpetual Limited ABN 86 000 431 827 and a part of the Perpetual Group (comprising Perpetual Limited and its subsidiaries, including the Trustee). Perpetual Limited is an ASX-listed company headquartered



in Sydney, Australia. The Investment Manager is an Australian registered company and has been in operation since 2015 acting as third-party manager of a wider Real Estate Investment Trust ("REIT") portfolio, namely CapitaLand Ascendas REIT.

## **Perpetual Corporate Trust (PCT)**

The Trust sits within PCT, which is a division of Perpetual Limited and forms part of the Perpetual Group. PCT provides a broad range of fiduciary, agency and digital products to the debt capital markets and managed funds industries both domestically and internationally. Debt Market Services includes trustee, document custodian, agency, trust management, accounting, standby servicing, and reporting solutions. Perpetual Digital provides data services, industry roundtables, and our new Perpetual Intelligence platform-as-a-service products supporting the banking and financial services industry. Managed Funds Services provides services including independent responsible entity, wholesale trustee, custodian, investment management and accounting (such as those provided by the Trust).

#### Investments

The Trust's Assets under Management was a total of \$2,696,034,000. These assets are made up solely of investments into Sub Trusts of which the underlying assets are logistics and commercial property. The account domicile was only in Australia.

## Supply chain

The Trust's supply chain consists of six direct service providers. These service providers are all located in Australia.

- Investment & Asset management
- Fund accounting
- Tax agent
- Audit services
- Legal representation
- · Property related consultants

## Procurement categories for service providers/suppliers are:

- Investment & Asset management services two suppliers
- Professional services including tax agent, lawyers, auditors and property-related consultants four suppliers

Out of the six tier one suppliers that the Trust engages with, five have Modern Slavery Statements in place.

## **Modern Slavery Risks**

The Trustee understands that modern slavery risk can occur in operations and supply chains. The Trustee considers risk assessment a critical process to identifying inherent risk of modern slavery across Ascendas REIT Australia. As Trustee, we conduct an annual risk assessment on all Trusts that meet the Modern Slavery Act reporting threshold. The risk assessment is done separately to Perpetual Group's corporate modern slavery risk assessment and is in addition to routine due diligence activities undertaken for management of the Trust.

## Defining modern slavery risks

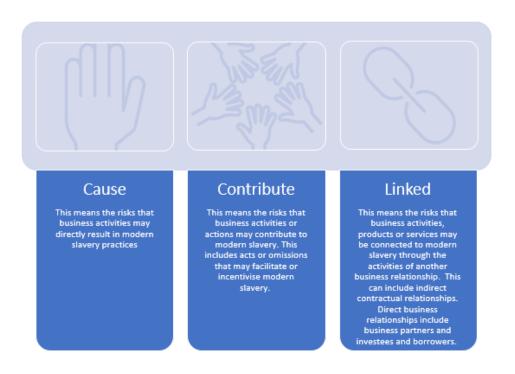
Modern slavery is serious exploitation that undermines a person's freedom. In a situation where modern slavery occurs, a person cannot refuse or leave due to threats, violence, cohesion, abuse of power, or deception<sup>1</sup>. Modern slavery occurs in a variety of forms, there are eight types including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour<sup>2</sup>.



<sup>&</sup>lt;sup>1</sup> International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM), 2022. Global Estimates of Modern Slavery: Forced Labour and Forced Marriage, 13.

<sup>&</sup>lt;sup>2</sup> As defined in the Australian Modern Slavery Act 2018 (Cth)

Modern slavery risk means the potential for the Trust to cause, contribute to, or be directly linked to modern slavery through their operation or supply chain. This means looking at risks to people rather than risk to the company (such as reputational or financial damage), although often these risks are connected. The Trust recognises that COVID-19, conflict and climate change has exacerbated modern slavery risks for people in vulnerable situations<sup>3</sup>.



#### Risk assessment methodology

In FY23, the Trustee collected information on the Trust's supply chain and operations to include in a modern slavery risk assessment. Specifically, the Trustee investigated the investment trust and service providers that the Trust has a direct relationship with. The investment trust and service providers were then assessed for inherent modern slavery risks and an inherent risk profile was determined for each entity. Inherent risk is the level of risk before any actions are taken to manage the risk's impact or likelihood.

# **Risk Assessment Results**

#### Investments

The Trust's investment footprint is concentrated as all of its assets are units held in the Sub Trusts. The FY23 risk assessment conducted by the Trustee revealed that this investment sector is considered to have higher inherent risk, as it is a part of the property and construction industries. The below information summarises the risks in this industry. The approach to due diligence and assessment is informed by this risk profile.

Investment Sector	Inherent Risk Profile	
Commercial Properties	The property industry has a higher risk of modern slavery due to the demand for low-skilled labour and limited visibility of long and complex supply chains <sup>4</sup> .	

<sup>&</sup>lt;sup>4</sup> KPMG and Australian Human Rights Commission, 2020. <u>Property, Construction & Modern Slavery: Practical responses for managing risk to people</u>, 9.



<sup>&</sup>lt;sup>3</sup> International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM), 2022. Global Estimates of Modern Slavery: Forced Labour and Forced Marriage

#### **Supply Chain**

The Trustee's FY23 risk assessment has identified no high-risk service providers. The Trustee's FY23 risk assessment identified two medium risk suppliers which operate in the real estate / property industry. All other service providers were rated low risk. The below information summarises the risks in this industry.

Sector/Product	Inherent Risk Profile
Investment & Asset Managers	There is low inherent risk of modern slavery risk from the investment manager engaged on the trust, this service provider operates in Australia and employs a highly skilled workforce of executive and professional personnel.
Professional Services	There is low inherent risk of modern slavery risk from the professional service providers engaged in the trust, all service providers operate in Australia and the service providers employee highly skilled workforce of executive and professional personnel.
Real Estate and Property Industry	This industry engages suppliers including commercial cleaning, security, and construction. These industries are considered to have a higher inherent risk of modern slavery due to them being characterised as base-skilled, sub-contracted labour.

# **Actions to Address Modern Slavery Risks**

As a Trust, addressing Modern Slavery risks is different to the approach that can be undertaken by a company which has direct oversight and control of its own operations. That is because the Trust itself owns no real property and has no employees, and can have influence, but not direct control, over the management its investments.

Whilst these limitations exist, as Trustee, we do and will continue to engage with the Investment Manager regarding modern slavery to ensure compliance with legislation.

As a Trust within the CapitaLand Ascendas REIT portfolio, the Trust adopts and adheres to CapitaLand Investment Limited's ESG policies and controls as per the 2030 Sustainability Master Plan (<a href="https://www.capitaland.com/content/dam/capitaland-sites/international/about-capitaland/sustainability/revisedsmp/SMP\_FINAL.pdf">https://www.capitaland.com/content/dam/capitaland-sites/international/about-capitaland/sustainability/revisedsmp/SMP\_FINAL.pdf</a>).

CapitaLand Investment Limited has in place a Supply Chain Code of Conduct, which is aligned with the United Nations Global Compact. Within this Code of Conduct, there are prescribed communications around human rights such as child labour and forced labour.

## **Due Diligence**

#### Risk assessment

The Trustee's annual risk assessment was conducted to assess the Trust's inherent modern slavery risks in its direct supply chain. The results of the risk assessment are used to prevent, identify and address modern slavery risks that may operate within the Trust.

## **Investments**

The Trust invests in Sub Trusts that ultimately own logistics and commercial real estate in Australia and is managed by Ascendas Funds Management (Australia) Pty Ltd ("Investment Manager"). The Investment Manager is a wholly owned subsidiary of CapitaLand Investment Limited and one of the Group's core businesses is in the investment and management of real estate (<a href="https://www.capitaland-ascendasreit.com/en/about-clar.html">https://www.capitaland-ascendasreit.com/en/about-clar.html</a>).

In managing the real estate assets, the Trustee & Investment Manager engages professional property management firms such as Colliers International, to help manage the day-to-day property and facility management services. Additionally, Colliers International is required to enter into CapitaLand Investment Limited's Supply Chain Code of Conduct, which covers issues such as child labour, forced labour, and compliance with local labour law and regulations (https://www.colliers.com/en-xe/policies).



#### **Supply Chain**

As the Trustee for the Trust, PCT owns the relationships with the direct suppliers which are used by the Trust. As part of the Perpetual Group, the Trustee is subject to the same policies, due diligence and remediation process to address modern slavery as the Perpetual Group. This includes adherence to Perpetual Group's Modern Slavery Framework, which sets out the programs, processes and tools in place to ensure compliance with the Modern Slavery Act.

Procurement processes including provisions focused on modern slavery within contractual terms with new suppliers to ensure our suppliers understand we require them to assess and manage modern slavery risk in their business. New PCT employees take part in the online modern slavery training module and employees have access to Perpetual Group's grievance mechanisms.

The Sub Trusts' and Property Trusts' main service provider is Colliers International, the property and facilities management firm who operates in Australia. They are obligated to identify and address modern slavery risks in their operations and supply chains. As a result, they have modern slavery due diligence processes in place as well as modern slavery statements published on the Australian Government's Modern Slavery Statements Register<sup>5</sup>.

## **Training and Communication**

Perpetual has a process for all trusts to follow for modern slavery reporting. This process includes:

- Engaging with investment managers to ensure they are aware of the modern slavery reporting obligations and seek their input to Modern Slavery Statements; and
- Providing training for the Trust's Client Managers conducted by our Sustainability and Modern Slavery Manager.

#### Remediation

As a Trustee, PCT may be linked to modern slavery through our business relationships with other entities via their own investments and supply chains, however, it is unlikely that the Trustee will directly cause or contribute to modern slavery.

Perpetual Group's remediation approach is outlined in our Modern Slavery Framework, which the Trustee is subject to. Should an incident of modern slavery occur in a Trust which we have 'caused or contributed' to, we would engage with the Investment Manager and act in accordance with our remediation principles.

The purpose of remediation is to ensure Perpetual takes reasonable steps to:

- Address the underlying root causes driving the modern slavery if possible;
- Prevent the modern slavery impact from re-occurring by collaborating, supporting remediation and monitoring the implementation of remedial measures taken by another party; and
- Ensure compliance with national and international labour and human rights standards.

Our remediation process has been approved by Perpetual Group's Executive Committee and has been captured in our Modern Slavery Framework. The process details specific steps that we will take if Perpetual has 'caused or contributed' to modern slavery.

Our approach to remediation is led by a set of guiding principles. These include ensuring that our actions are in the best interest of the suspected victim or victims and responding in a way that is appropriate to the circumstances of the situation.

The principles also articulate that we will take steps to prevent further harm to achieve the best possible outcome for the victim or victims and consider whether there is any action that Perpetual can take that may address the underlying structural factors that have contributed to the exploitation.

Our Modern Slavery Framework, including the remediation process, is available to our employees on our intranet.

#### Grievance mechanism

Modern slavery is a form of reportable misconduct under Perpetual's Whistleblower Policy. Through this mechanism, employees in the Perpetual Group, including the Trustee can report any concerns to a Whistleblower Protection Officer

<sup>&</sup>lt;sup>5</sup> Colliers Modern Slavery Statement, Australian Government's Modern Slavery Statements Register, 2021. Policy: Modern Slavery Statement



within Perpetual or anonymously through our third-party whistle-blower hotline. Training on how to access and report through this mechanism is provided in Perpetual Group's employee-wide modern slavery training program.

# **Measuring the Effectiveness of Actions**

Outlined below is the key progress made by the Trustee on behalf of the Trust in FY23 and the actions for FY24:

## FY23 progress:

- Mapped the Trust's supply chain to identify the different sectors their service providers are from
- Conducted an annual risk assessment to determine inherent modern slavery risks
- Reviewed and updated our process for assessing and reporting on modern slavery in trusts

## **Actions for FY24:**

- Monitor emerging global trends in modern slavery and include anything relevant for the FY24 risk assessment
- We have commitment to have the Trust statement reporting process reviewed annually
- Review and update modern slavery training for Trust Managers
- Continuous development of SMEs within the Trust team to improve engagement and reporting

# **Appendix**

# Appendix 1: Australian Modern Slavery Act - Mandatory Reporting Criteria

The following table describes the location of each mandatory reporting criteria within the FY23 Modern Slavery Statement.

Mandatory Reporting Criteria	Location in Statement
Identify the reporting entity	Reporting Entity, Page 1
Describe the reporting entity's structure, operations, and supply chains	Structure, Operations and Supply Chain, Page 1
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Modern Slavery Risks, Page 2
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Actions to Address Modern Slavery Risks, Page 4
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Measuring the Effectiveness of Actions, Page 6
Describe the process of consultation and any entities the reporting entity owns or controls	Consultation, Page 1



# **Appendix 2: Structure Diagram**

The following Structure Diagram shows the latest trust structure, including the number and types of properties ultimately owned by the Trust (and ultimately beneficially owned by unitholders located in Singapore).

