

Modern Slavery Statement

Cairnton Holdings Pty Limited FY2021

This is a joint modern slavery statement covering the activities of the reporting entities: Cairnton Holdings Pty Limited (ACN 008 394 134), Bareage Pty. Limited (ACN 060 526 865), Cairnton Pty Ltd (ACN 001 735 075), Conpress Securities Pty Limited (ACN 160 602 853), Consolidated Press (Finance) Pty Ltd (ACN 001 557 035), Consolidated Press Financial Services Pty Limited (ACN 008 457 869), Consolidated Press Holdings Pty Limited (ACN 008 394 509), CPH Crown Holdings Pty Limited (ACN 603 296 804), CPH Gaming I Pty Limited (ACN 603 295 674), CPH Gaming II Pty Limited (ACN 603 295 923), CPH Gaming III Pty Limited (ACN 603 296 162), CPH Gaming IVA Pty Limited (ACN 603 296 537), CPH Gaming IVB Pty Limited (ACN 603 296 546), and Cairnton Holdings Pty Limited's owned and controlled subsidiaries (collectively, the **Cairnton Group**) during the financial year ended 30 June 2021.

This is the Cairnton Group's second modern slavery statement under the *Modern Slavery Act 2018* (Cth).

This statement has been approved by the Board of Cairnton Holdings Pty Limited on 22 December 2022.

About us

The Cairnton Group is committed to ensuring that our business activities respect human rights and working to limit the risks of modern slavery within our supply chains.

Our structure

Cairnton Holdings Pty Limited is a company incorporated in Australia with a registered office located at Level 13, Macquarie House, 167 Macquarie Street, Sydney. The Cairnton Group also has offices in Ireland and the United States.

Cairnton Holdings Pty Limited controls and operates multiple subsidiaries, including each member of the Cairnton Group. These subsidiaries operate in various industries and, as at the date of this statement, are located in Australia, Ireland, the United States, the Commonwealth of the Bahamas, Barbados, Malaysia, the Netherlands, Argentina and the Cayman Islands.

Our operations

The principal activity of the Cairnton Group is investment holding of primarily passive investments.

The Cairnton Group's asset portfolio consists predominantly of non-controlled listed and unlisted investments in Australia and the United States.

During the periods covered by this statement the Cairnton Group also held both freehold and leasehold property investments in Australia, the United Kingdom, Dubai, Argentina and the United States.

Further, during the periods covered by this statement the Cairnton Group's assets included an interest in an aircraft.

As at 30 June 2021 the Cairnton Group engaged 67 permanent employees, 21 casual employees, and 4 contractors globally. The Cairnton Group also engages other ad hoc contractors from time to time.

Our supply chain

The Cairnton Group supply chain falls into 2 broad categories:

- Operational and Corporate; and
- Asset Management.

Operational and Corporate

Operating and corporate key suppliers include:

- professional service providers (including legal, audit, tax, IT, insurance, company secretarial service providers);
- landlords and ancillary services relating to rental of office space (including cleaning staff);
- incidental suppliers relating to office operations (office materials, courier services, security, parking, motor vehicles); and
- travel providers.

Asset Management

Key suppliers that support the Cairnton Group's investments in property and the aircraft include:

- suppliers of regular property and equipment maintenance services (including fire safety services, landscaping services, building and asset repair services);
- lessors of motor vehicles;
- providers of security services, utilities and insurance; and
- other general incidental suppliers for the aircraft.

Our annual expenditure on our supply chain is relatively low. As at 30 June 2021, our suppliers were located across numerous jurisdictions including Australia, the United States, Ireland, the United Kingdom, the Netherlands, Hong Kong, Argentina, the Commonwealth of the Bahamas, Barbados, the Cayman Islands, Malaysia, Jersey and Mauritius.

We engage our suppliers on long term stable arrangements.

Modern slavery risks

The Cairnton group consider the risks of modern slavery practices in our operations and supply chains to be relatively low, given our focus of operations in countries that have lower prevalence of modern slavery and the terms on which we engage our suppliers. Strong relationships with our suppliers of goods and services allow us to effectively monitor and address our supply chain risks.

We nevertheless recognise that modern slavery may impact our business activities and we endeavour to take responsibility for reducing the risk that we might contribute to modern slavery through our operations and supply chains.

Our Group continues to use a risk assessment profile to consider our sector and industry, the products and services we acquire, and the geographic location of our operations as potential indicators of modern slavery risks. These indicators are reviewed against industry guides including the:

- [ACSI Modern Slavery Risks, Rights & Responsibilities Guide](#);
- [Global Slavery Index](#); and
- Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities,

to assess their level of risk.

Risk Profile

Risk	Description of risk
Sector / Industry	The Cairnton Group's business covers a wide range of sectors and industries. Our prominent business of investment holdings in tangible assets has minimal modern slavery risk.

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Product / Services	<p><i>Professional Service Providers</i></p> <p>We continue to engage suppliers that are mostly professional services providers engaged to operate and maintain our assets. Service procurement is identified as a high risk area for modern slavery (including building services, cleaning, logistics, travel, security and maintenance services). This risk rises when suppliers engage base skilled workers. Employees in these areas are at risk of having a lower understanding of working rights, exposing them to excessive work hours, underpayment and withheld wages.</p> <p>The Cairnton Group continues to engage directly with our supply chain to ensure fair working conditions, and pay premium amounts for the services they acquire. A large number of our service providers are skilled professionals in industries such as maritime, property, legal and tax, which present low risk. Some of our vendors and suppliers are also subject to the reporting requirements in the Modern Slavery Act or its equivalent in other jurisdictions.</p> <p><i>IT Procurement</i></p> <p>IT Procurement is a high risk area for modern slavery. The extraction and manufacture of raw materials for IT components and the disposal of e-waste all present modern slavery risks.</p> <p>The Cairnton Group continues to purchase IT equipment on a relatively small scale for a variety of uses and this equipment is purchased from reputable and large-scale retailers.</p>																												
	Geographic	<p>Cairnton Group's suppliers come from a wide range of countries, with the majority of our supplier spend in Australia and the United States. Both of these countries have a low prevalence of modern slavery.</p> <p>Malaysia, the Bahamas and Jersey present some modern slavery risks as they have a high prevalence rating or a lack of reporting. However, our suppliers in those jurisdictions are professional service providers only.</p> <p>We continue to work closely with our other international suppliers to manage any risks associated with modern slavery.</p>	<table border="1"> <thead> <tr> <th data-bbox="948 1055 1203 1122">Supplier</th> <th data-bbox="1203 1055 1474 1122">Prevalence Index Rank (out of 167)</th> </tr> </thead> <tbody> <tr> <td data-bbox="948 1122 1203 1155">Australia</td> <td data-bbox="1203 1122 1474 1155">163</td> </tr> <tr> <td data-bbox="948 1155 1203 1189">United States</td> <td data-bbox="1203 1155 1474 1189">158</td> </tr> <tr> <td data-bbox="948 1189 1203 1223">Ireland</td> <td data-bbox="1203 1189 1474 1223">147</td> </tr> <tr> <td data-bbox="948 1223 1203 1256">Barbados</td> <td data-bbox="1203 1223 1474 1256">112</td> </tr> <tr> <td data-bbox="948 1256 1203 1290">Bahamas</td> <td data-bbox="1203 1256 1474 1290">No data available</td> </tr> <tr> <td data-bbox="948 1290 1203 1323">Mauritius</td> <td data-bbox="1203 1290 1474 1323">161</td> </tr> <tr> <td data-bbox="948 1323 1203 1357">Malaysia</td> <td data-bbox="1203 1323 1474 1357">42</td> </tr> <tr> <td data-bbox="948 1357 1203 1391">Netherlands</td> <td data-bbox="1203 1357 1474 1391">143</td> </tr> <tr> <td data-bbox="948 1391 1203 1424">Hong Kong</td> <td data-bbox="1203 1391 1474 1424">156</td> </tr> <tr> <td data-bbox="948 1424 1203 1458">Jersey</td> <td data-bbox="1203 1424 1474 1458">No data available</td> </tr> <tr> <td data-bbox="948 1458 1203 1491">Argentina</td> <td data-bbox="1203 1458 1474 1491">157</td> </tr> <tr> <td data-bbox="948 1491 1203 1525">United Kingdom</td> <td data-bbox="1203 1491 1474 1525">137</td> </tr> </tbody> </table>	Supplier	Prevalence Index Rank (out of 167)	Australia	163	United States	158	Ireland	147	Barbados	112	Bahamas	No data available	Mauritius	161	Malaysia	42	Netherlands	143	Hong Kong	156	Jersey	No data available	Argentina	157	United Kingdom	137
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Actions to assess and address risk

The Cairnton Group acknowledge that there may be modern slavery risks associated with the products and services we acquire. This risk is considered to be low, as members of the Group have strong relationships with suppliers and source a majority of their supplies from low-risk nations. Regardless of the risk levels, we are actively taking the following steps to assess and address potential risks:

- engaging both internal and external lawyers, finance and HR personnel to ensure compliance with laws in all jurisdictions;

- continuing to raise awareness in our business lines of the risks of modern slavery; and
- obtaining our goods and services from suppliers we have dealt with for many years. This leaves us confident in the quality of our suppliers employment conditions and supply chain operations.

The Cairnton Group expects all of our third-party suppliers to operate in a responsible, ethical, open and transparent way and in compliance with all applicable laws and regulations. The Cairnton Group's agreements with our key service providers generally require that the service providers will not violate or breach any applicable law or regulation, which includes modern slavery laws.

Our current governance framework includes policies that assist in addressing modern slavery risks. The Cairnton Group has the following policies:

- Whistleblower Protection Policy – the Cairnton Group aims to deter wrongdoing by encouraging anyone making a disclosure of such to feel they can do so safely, securely and with confidence they will be protected and supported;
- Discrimination Policy – the Cairnton Group aims to treat all employees and contractors with fairness and free from discrimination; and
- Diversity and Equal Opportunity Policy – the Cairnton Group aims to foster diversity and equal opportunity in the workplace to fully utilise the potential of its employees and contractors.

Assessing our effectiveness

The Cairnton Group continues to informally monitor the effectiveness of our actions, processes and policies to address modern slavery risks in our supply chain. As set out elsewhere in this report, the risks of modern slavery in the Cairnton Group supply chain remain relatively low.

We remain committed to developing formal frameworks and review processes to ensure we can better review the effectiveness of our actions.

Consultation

The Cairnton Group operates collectively, and the policies, approaches and actions set out in this report apply to all entities in the group.

Cairnton Holdings Pty Limited consulted with each other member of the Cairnton Group by providing a copy of this statement to the board of those companies for review and offering them the opportunity to comment on the document.

Prior to this report being approved by the board of Cairnton Holdings Pty Limited, executives and senior managers of our subsidiaries in Australia and overseas reviewed this statement.

Looking forward

In future reporting years, we will focus on continuing to monitor for any modern slavery risks within our supply chain.

Approval

This statement was approved by the Board of Directors of Cairnton Holdings Pty Limited, in their capacity as the principle governing body of Cairnton Holdings Pty Limited for and on behalf of all reporting entities in the Cairnton Group (as the parent entity) on 22 December 2022.

This statement was signed by Michael Johnston in his capacity as Director and board member of Cairnton Holdings Pty Limited.

Michael Johnston
Director

