

SCAPE AUSTRALIA MODERN SLAVERY DISCLOSURE STATEMENT

Overview

This joint disclosure statement addresses the requirements of the *Modern Slavery Act 2018* (Cth) (“**Modern Slavery Act**”) which requires entities with over \$100 million of annual consolidated revenue to make a statement describing steps taken by the entity to address modern slavery risks within its operations and supply chains. It is prepared for the following stapled entities along with their wholly owned subsidiaries:

- Scape Core Fund Trust
- Scape Australia (Vulture) Trust
- Scape Australia Holding Trust
- Scape Core Fund Operator Pty Ltd

(together, the “**Scape Core Fund**”)

- Scape Australia CUB Trust
- Scape CUB Operator Pty Ltd
- Scape Australia Franklin Trust
- Scape Franklin Operator Pty Ltd
- Scape Australia Holding 2 Trust
- Scape Holding 2 Operator Pty Ltd
- Scape Australia (Kensington APT) Trust
- Scape Kensington APT Operator Pty Ltd
- Scape Australia Todman Trust
- Scape Todman Operator Pty Ltd
- Scape Australia Ascot Trust
- Scape Ascot Operator Pty Ltd

(together, the “**Scape JV1 Fund**”)

- Scape Australia Investment Trust No 2
- Scape Holding Operator 2 Pty Ltd

(together, the “**Scape JV2 Fund**”)

Only the Scape Core Fund entities meet the annual consolidated revenue threshold, however, Scape is voluntarily reporting on the other entities (Scape JV1 Fund and Scape JV2 Fund) because all entities are managed by Scape using a consistent process for identifying Modern Slavery risks, consistent risk mitigation strategies and measures, and consistent approach to assessing effectiveness, described below.

About Scape

The Scape Core Fund, Scape JV1 Fund and Scape JV2 Fund are managed by Scape Australia Management Pty Ltd (“**Scape**”), a property developer, owner and manager of asset portfolio comprising of purpose-built student accommodation and built to rent property assets in Australia.

Scape relies on both domestic Australian suppliers and international suppliers for the operation of Scape’s existing assets and for the development of Scape’s new construction projects. Scape directly employs both full time, part time and casual labor. Scape has operational supply chains including cleaning, security, landscaping and maintenance of existing buildings. Scape also has development supply chains through Scape’s building contractors appointed to deliver new development projects

who source materials and services for construction on our behalf. Scape's upstream supply chain includes our investors and debt providers.

What we mean by 'Modern Slavery'

Modern slavery is generally described as being a situation whereby offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery can include: forced labour; human trafficking; forced marriage; debt bondage slavery; servitude; and child labour.

Identifying Modern Slavery Risks

Scape recognises that modern slavery can occur in every industry and sector and has severe consequences for victims. Modern slavery also distorts global markets, undercuts responsible business and can pose significant legal and reputational risks to entities. Scape also acknowledges that taking action to combat modern slavery makes good business sense. Entities that take action to combat modern slavery in their operations and supply chains can protect against possible business harm and improve the integrity and quality of their supply chains.

Scape acknowledge that there may be risks of modern slavery practices in its operations and supply chains.

Scape will not tolerate slavery or human trafficking or abusive or unfair treatment in any part of its business, or in any of its supply chains. This same high standard is expected from all of Scape's team members, suppliers, contractors and other business partners. To this end, Scape is committed to:

- acting with integrity and ethically in all its business relationships and dealings;
- generally, and in particular through its policies and practices, taking steps to ensure that modern slavery plays no part in its business or supply chains; and
- ensuring that there is transparency in Scape's business and its approach to preventing and addressing modern slavery in its operations and supply chains.

Risk mitigation strategies & measures

Modern Slavery Policy: Scape has an expectation that its business practices and supply chains, as well as the practices and supply chains of its team members, suppliers, contractors and other business partners, will comply with Scape's zero-tolerance policy towards modern slavery. This expectation is communicated to Scape's staff and supply chain through Scape's Modern Slavery Policy. Scape's Modern Slavery Policy applies to all persons working for or on behalf of Scape in any capacity, including employees at all levels, directors, officers, temporary and casual workers, interns, agents, contractors, external consultants, third-party representatives and business partners.

ESG Policy: Scape has a publicly available ESG Policy ([Link](#)) which includes the statement: *"We expect our partners to sustain high ethical and environmental standards, including upholding workers' rights, implementing all Australian Labor standards and working conditions, and implementing processes to avoid the risk of child labor, forced or compulsory labor, modern slavery and other human rights abuses."*

Compliance Manual: Scape has a compliance manual which contains our staff code of conduct, as well as Scape's Modern Slavery Policy. It is Scape's expectation that all staff are familiar with the contents of the compliance manual. A breach of the compliance manual may result in disciplinary action being taken by Scape which may lead to a person's termination of employment or

engagement with Scape. The Compliance Manual and all policies within it apply to all Scape team members as well as individuals who represent Scape including contractors, consultants, labour hire workers, suppliers, customers, consumers, and any other visitors regardless of citizenship or work location. All Scape team members are required to be familiar with and comply with the compliance manual.

Compliance Training: Scape carries out annual mandatory compliance training for all staff, which addresses modern slavery and makes staff aware of Scape's Compliance Manual including our Modern Slavery Policy.

Procurement policy: Scape has a procurement policy overseen by our Chief Operating Officer, which provides purchasing guidelines and requirements for Scape team members in carrying out their procurement functions on behalf of Scape. The Procurement Policy requires compliance with Scape's related policies relevantly including Scape's Modern Slavery Policy, it also sets out sustainable ethical and socially responsible procurement guidelines including but not limited to complying with Scape's Modern Slavery Policy. It also requires compliance with ethical and legal requirements, and sets out explicit standards of behaviour including:

- Observe all applicable probity, legal and regulatory requirements;
- Deal fairly, impartially and consistently with all suppliers/contractors;
- Monitor and report any suspected fraud, corruption or other wrongdoing;
- Comply with the Scape Code of Conduct.

Supplier contract clauses: Scape requires all contracts to be reviewed by our in-house legal counsel, and use standard form agreements for example our Professional Services Agreement, which contain a clause covering Modern Slavery. Scape's Modern Slavery contract clause requires the relevant contractor to specifically comply with the Modern Slavery Act and any other laws relating to anti-slavery, servitude, forced labour, trafficking in persons (including orphanage trafficking of children), forced marriage, child labour, debt bondage and other slavery-like practices ("Modern Slavery Laws"). They also require such contractors to immediately notify Scape of any breaches of any Modern Slavery Laws, and to use reasonable endeavours to ensure that the contractors do not take any action or make any omission which would put Scape in breach of such laws. The supplier must, at its own cost, comply with all Modern Slavery Laws in carrying out the Services, and must comply, and must use all reasonable endeavours to procure that all persons in its supply chains at all times comply with all Modern Slavery Laws; and must not, and use all reasonable endeavours to procure that all persons in its supply chains do not, do anything to put Scape in breach of any Modern Slavery Laws, including by implementing appropriate policies and due diligence procedures and using reasonable endeavours to obtain and exercise audit rights with respect to its Personnel. The Supplier is also obliged by this clause to notify Scape in writing as soon as practicable if it becomes aware of any actual or reasonably anticipated breach, and take all actions necessary to return to compliance. Such notice must set out full details of the circumstances concerning the actual or potential breach of any Modern Slavery Laws.

Risk & incident management: Scape have a Risk Committee that meets quarterly and reports to our Board. Scape's Operations team hold weekly toolbox talk meetings, monthly State workplace health and safety meetings and monthly national health and safety meetings. Scape have a Risk Management Framework and maintain a risk register and we periodically carry out risk reviews. Scape have an Incident Escalation Policy, and report to the Risk Committee on all incidents across the portfolio.

Whistleblowing Policy: Scape’s Whistleblowing Policy allows Scape team members or contractor to safely raise any concerns that they may have about any individuals or organisations that Scape interacts with, whether they be clients, suppliers, or others.

Software tool for supplier self assessment questionnaires: Scape is in the process of procuring a software tool that will be used to send our suppliers a Modern Slavery self-assessment survey questionnaire, and will be used by Scape to review and evaluate their responses, identify risk, and engage with any identified high-risk suppliers.

Internal Audits: Scape is in the process of procuring an Internal Audit function that will: review and if necessary amend the existing Risk Framework with the input of senior team members; develop an Assurance Map showing how risks are currently managed and gaps to be covered by internal audit; and develop an Internal Audit Strategy setting out how the function will assist in addressing strategic imperatives for Scape.

Assessing effectiveness

Scape monitor & review the effectiveness of the modern slavery risk management framework and processes by periodically reviewing our Modern Slavery Policy, and by working toward continual improvement of our controls including procurement processes, through our ESG (Environment, Social & Governance) strategy and targets, and by updating our Compliance Manual as required, by ensuring that Modern Slavery clauses are included in all our contracts, and carrying out mandatory compliance training for all staff annually.

Availability

This Modern Slavery Statement will be published on the Scape publicly accessible website, and Submitted to Minister for Home Affairs via the [Modern Slavery Statements Register \(modernslaveryregister.gov.au\)](https://modernslaveryregister.gov.au).

Approval and Signature

This Modern Slavery statement has been approved by Scape’s Board of Directors and signed by a responsible member of the board, i.e. our Group Executive Chairman.



Stephen Gaitanos
Managing Director and Group CEO



Craig Carracher
Group Executive Chairman