

Modern slavery statement – Commercial & General Pty Ltd

Reporting period 1 July 2023 to 30 June 2024

Modern slavery statement

Introduction

This modern slavery statement (**Statement**) has been published by Commercial & General Pty Ltd (**C&G**) pursuant to the *Modern Slavery Act 2018* (Cth) (**the Act**) in respect of the reporting period ending 30 June 2024 (**Reporting Period**) and covers C&G and its controlled entities (**C&G Group**).

C&G Group is a Reporting Entity within the meaning of the Act for the Reporting Period. This Statement is published pursuant to the requirements of the *Modern Slavery Act 2018* (Cth). C&G Group is committed to assessing, in so far as reasonably practicable, any risks of modern slavery in its operations and supply chains and taking appropriate steps to address those risks.

This is the fourth Reporting Period for which the C&G Group has submitted a Statement.

This Statement outlines the steps C&G Group has taken during the Reporting Period and its future plans to identify and address modern slavery risks in its operations and supply chains.

Modern slavery

C&G Group recognises that modern slavery takes many forms which are crimes and a violation of fundamental human rights involving the deprivation of a person's liberty and exploitation for personal or commercial gain. Modern slavery includes:

- human trafficking;
- recruitment with the intention of depriving a person of their personal freedoms;
- confiscation of personal or travel documents;
- forced labour;
- debt bondage;
- servitude;
- child labour; and
- any other kind of exploitation that violates a person's human rights and dignity.

Structure, operations, and supply chains of the C&G Group

The C&G Group is a vertically integrated property group that develops, constructs, manages and invests, in high quality commercial, industrial, and multi-unit residential properties in Australia. C&G Group is based in Adelaide and also has offices in Melbourne. The entities within the C&G Group are fully integrated and share common management and administration services and systems.

C&G Group undertakes in house project management and engages third party consultants to assist in managing and delivering projects.



C&G's major suppliers are:

- large scale building contractors engaged in connection with projects;
- third party building, construction and property management consultants.

All of C&G Group's projects and operations are situated in Australia.

Throughout the Reporting Period C&G Group also had interests in joint ventures which held industrial property portfolios in Australia.

Risks of modern slavery practices in the operations and supply chains of the C&G Group

The C&G Group continues to assess modern slavery risks within its operations and supply chains.

C&G Group's operations are conducted within Australia with Australian based employees. Builders and consultants with which C&G Group contracts are also based in Australia although they may be part of groups with multinational operations. We have determined that given the low prevalence and risk of modern slavery practices in the industry within Australia, these operations have a low or negligible risk of modern slavery practices.

C&G Group has identified a potential for modern slavery risks in building and construction supply chains in so far as building and construction supplies may be sourced from regions where labour and manufacturing conditions are more likely to involve modern slavery practices. C&G Group does not have visibility over these aspects of its supply chain but actively requires its contractors and suppliers, through contractual terms, to adhere to, identify and mitigate modern slavery risks.

C&G Group has also identified a potential for modern slavery risks in IT and business administration supply chains in so far as some of those services have overseas offices. C&G Group does not have visibility over these aspects of its supply chain but again, actively requires these suppliers, through contractual terms, to adhere to, identify and mitigate modern slavery risks.

C&G Group continues to improve its processes for making enquiries of its major suppliers with respect to modern slavery risks and the management of those risks in these supply chains. C&G Group has personnel dedicated to monitoring its ESG (environment, social and corporate governance) obligations and compliance, which includes modern slavery. These personnel have developed and implemented a Quality, Health, Safety and Environment (**QHSE**) framework for C&G Group in 2024, which framework incorporates C&G Group's modern slavery policy as referred to further below. An internal reporting process for the QHSE framework is anticipated to be finalised in 2025.

Actions taken by the C&G Group to assess and address risks of modern slavery, including due diligence and remediation processes

Supply chain due diligence

To enable C&G Group to assess the risks of modern slavery in our supply chains, C&G Group has implemented a process of making enquires with our major suppliers about risks in their supply chains and how modern slavery risks are managed by them.

The responses to these enquiries are used to assess the nature and extent of modern slavery risks in the supply chains of our major suppliers and to assist C&G Group in identifying possible mitigation steps that can be built into C&G Group's supplier selection and contracting processes.

C&G Group has now also incorporated modern slavery clauses in all new subcontracts with suppliers, including major suppliers, consultancy agreements and other downstream agreements, which clauses create an ongoing positive obligation on those parties to:

- disclose instances of modern slavery or risks of modern slavery in their supply chains to G&G Group; and
- take all reasonable steps to ensure modern slavery does not occur within their operations (including their suppliers).



C&G Group believes this will ensure modern slavery risks and mitigation of same are at the forefront of our suppliers' minds.

Modern slavery supplier code of conduct

C&G Group has a modern slavery supplier code of conduct (**Supplier Code**) which reinforces our commitment to ethical business operations and our expectations of our suppliers. Those expectations include:

- sharing our commitment to mitigating modern slavery risks in our supply chains;
- taking meaningful steps to identify and address modern slavery risks in their operations and supply chains;
- complying with any mandatory reporting obligations relating to modern slavery;
- providing the C&G Group with information about their supply chains to assist us in identifying and mitigating modern slavery risks.

C&G Group monitors compliance with the Supplier Code on an on-going basis and takes appropriate steps, to the extent practicable, to address instances of non-compliance. C&G Group intends to integrate the Supplier Code into our supplier selection and contracting processes.

Contractual terms

C&G Group has introduced changes to its standard trading and contract terms with its suppliers to include terms designed to facilitate the identification and mitigation of risks and to eliminate modern slavery practices. These terms are incorporated across the business, with suppliers, contractors and consultants actively accepting the obligations imposed by C&G Group in respect of modern slavery mitigation, and in respect of construction contractors, C&G Group requires information from the contractor's supply chain in relation to modern slavery.

Other

C&G Group continues to facilitate training sessions for staff to outline key principles and administrative and contractual requirements of modern slavery and to train staff to better assess suppliers in the context of C&G Group's Supplier Code.

C&G Group also commits to meeting modern slavery standards when submitting tenders for projects.

Consultation with entities owned or controlled by C&G

The C&G Group of entities operate under common management and reporting. Head office, administrative and management staff (human resources, in-house legal counsel, senior management) are responsible for the operation management of the C&G Group of entities. C&G Group entities therefore have direct lines of communication to C&G (who has prepared this Statement) and C&G has full visibility in relation to the operations of the C&G Group of entities. C&G has therefore been carrying out continuous consultation with the C&G Group in the development of this Statement.

There are no entities outside of the C&G Group which are controlled by C&G.

Review of C&G Group's policies, processes and practices

C&G Group has progressed, and is continuing, to undertake an overall review of its policies, processes and practices and to establish a framework and action plan for progressively integrating measures designed to address modern slavery risks across its operations. For example, C&G Group has incorporated modern slavery considerations into policies related to the QHSE and ESG frameworks.

C&G Group have, as a result, developed and implemented an internal Modern Slavery Policy applicable to all persons working for us or on our behalf, including employees, directors, officers, agents, contractors, consultants, and business partners (**Modern Slavery Policy**).



The Modern Slavery Policy identifies and sets out C&G Group's commitment to respecting human rights and addressing modern slavery, principles for taking meaningful action to identify and address modern slavery, C&G Group's compliance framework and standards of behaviour which C&G Group expects of its personnel and business partners with respect to addressing modern slavery. The Modern Slavery Policy also identifies key roles and responsibilities within C&G Group for implementing the policy.

C&G carried out a review of its Modern Slavery Policy in 2024. C&G Group will annually review its Modern Slavery Policy, and monitor progress against its modern slavery action plan. . Examples of the measures that C&G Group is progressing as part of its action plan are outlined below.

Assessing the effectiveness of actions taken to address modern slavery risks

C&G Group's has established processes for regularly reviewing and reporting on the effectiveness of the steps taken to identify and mitigate modern slavery risks including:

- monitoring supplier responses to our modern slavery risks enquiries;
- tracking supplier compliance with our Supplier Code; and
- assessing the level of internal and external awareness of and commitment to eliminating modern slavery practices.

As referred to above, C&G Group also anticipates finalising a reporting framework in 2025 which will be used to assess the effectiveness of these measures.

Future commitments

As noted above C&G Group continues to progressively integrate modern slavery risk mitigation measures across its operations under a modern slavery action plan.

C&G Group is committed to:


- reviewing new suppliers as part of the selection process, with a positive obligation on suppliers to disclose supply chain risks;
- annually reviewing the Modern Slavery Policy; and
- monitoring the progress of the modern slavery action plan.

Future measures that C&G Group is considering as part of its action plan include:

- integrating modern slavery information and provisions into all relevant human resources policies;
- establishing internal processes for monitoring responses to supplier enquiries, tracking progress of implementing our modern slavery mitigation measures and assessing the effectiveness of measures already implemented;
- expanding the scope of supplier enquiries about modern slavery matters;
- once implemented, regular review of supplier compliance with the Supplier Code and modern slavery trading and contractual terms;
- training for officers and employees to improve their knowledge of modern slavery and increase their ability to identify potential risks in our operations and supply chains.

Approval

This Statement has been approved by the board of C&G and is hereby signed by the Chair of the Board.


Jamieson James McClurg
Chairperson