

# Modern Slavery Statement

## Cairnton Holdings Pty Limited FY2023

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), Cavalane Holdings Pty Limited (ACN 080 695 754), Consolidated Press (Finance) Pty Ltd (ACN 001 557 035), Consolidated Press Financial Services Pty Ltd (ACN 008 457 869), Consolidated Press Holdings Pty Limited (ACN 008 394 509), CPH Zillow I Pty Limited (ACN 603 299 074)<sup>1</sup>, Northkom I Pty Limited (ACN 604 022 899), Northkom Pty Limited (082 885 961) and Cairnton Holdings Pty Limited's owned and controlled subsidiaries (collectively, the **Cairnton Group**) during the financial year ended 30 June 2023.

This is the Cairnton Group's fourth 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 2023.

### **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, Mexico and the United States.

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

As at 30 June 2023 the Cairnton Group engaged 66 permanent employees, 21 casual employees, and 3 contractors globally. In addition, a third party service company provides 47 maritime crew who work on the Cairnton Group's motor yachts. The Cairnton Group also engages other ad hoc contractors from time to time.

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<sup>1</sup> CPH Zillow I Pty Limited (ACN 603 299 074) was deregistered on 28 December 2022.

## ***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, the aircraft and the yachts 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 both the aircraft and the yachts.

Our annual expenditure on our supply chain is relatively low. As at 30 June 2023, our suppliers were located across numerous jurisdictions including Australia, the United States, Ireland, the United Kingdom, the Netherlands, Hong Kong, Argentina, Mexico, 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="956 1057 1203 1120">Supplier</th> <th data-bbox="1203 1057 1474 1120">Global Ranking (out of 160)</th> </tr> </thead> <tbody> <tr> <td data-bbox="956 1120 1203 1160">Australia</td> <td data-bbox="1203 1120 1474 1160">149</td> </tr> <tr> <td data-bbox="956 1160 1203 1200">United States</td> <td data-bbox="1203 1160 1474 1200">122</td> </tr> <tr> <td data-bbox="956 1200 1203 1240">Ireland</td> <td data-bbox="1203 1200 1474 1240">153</td> </tr> <tr> <td data-bbox="956 1240 1203 1281">Barbados</td> <td data-bbox="1203 1240 1474 1281">No data available</td> </tr> <tr> <td data-bbox="956 1281 1203 1321">Bahamas</td> <td data-bbox="1203 1281 1474 1321">No data available</td> </tr> <tr> <td data-bbox="956 1321 1203 1361">Mauritius</td> <td data-bbox="1203 1321 1474 1361">150</td> </tr> <tr> <td data-bbox="956 1361 1203 1402">Malaysia</td> <td data-bbox="1203 1361 1474 1402">72</td> </tr> <tr> <td data-bbox="956 1402 1203 1442">Mexico</td> <td data-bbox="1203 1402 1474 1442">64</td> </tr> <tr> <td data-bbox="956 1442 1203 1482">Netherlands</td> <td data-bbox="1203 1442 1474 1482">157</td> </tr> <tr> <td data-bbox="956 1482 1203 1523">Hong Kong</td> <td data-bbox="1203 1482 1474 1523">132</td> </tr> <tr> <td data-bbox="956 1523 1203 1563">Jersey</td> <td data-bbox="1203 1523 1474 1563">No data available</td> </tr> <tr> <td data-bbox="956 1563 1203 1603">Argentina</td> <td data-bbox="1203 1563 1474 1603">104</td> </tr> <tr> <td data-bbox="956 1603 1203 1644">United Kingdom</td> <td data-bbox="1203 1603 1474 1644">145</td> </tr> </tbody> </table>	Supplier	Global Ranking (out of 160)	Australia	149	United States	122	Ireland	153	Barbados	No data available	Bahamas	No data available	Mauritius	150	Malaysia	72	Mexico	64	Netherlands	157	Hong Kong	132	Jersey	No data available	Argentina	104	United Kingdom
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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. In future reporting periods, we will:

- regularly review our modern slavery processes, and have senior management engaging annually to consider whether we are appropriately identifying and evaluating our modern slavery risks; and
- when commencing a new operation or engaging a new supplier, assessing whether our existing risk management processes remain appropriate;

### **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, including by:

- developing an action plan to focus and prioritise our actions for future reporting periods;
- establish the roles and responsibilities of people in our business who will be responsible for developing a modern slavery framework; and
- reviewing modern slavery statements and other information provided from suppliers to assess the modern slavery risks in our supply chains.

## 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 2023.

This statement was signed by Catherine Davies in her capacity as Director and board member of Cairnton Holdings Pty Limited.

A handwritten signature in blue ink, appearing to read 'CD', is positioned above the name of the signatory.

Catherine Davies  
Director