

The image features a background architectural rendering of a modern city square. On the left is a historic, multi-story red brick building with arched windows and a clock tower in the distance. On the right is a tall, modern glass skyscraper with a curved facade. A black oval overlay is centered in the upper half of the image, containing the TOGA logo and text.

TOGA

ESTABLISHED 1963

**TOGA Group
Modern Slavery Statement
Financial Year 2025**



TOGA

MODERN SLAVERY STATEMENT 2025

ABOUT THIS STATEMENT

This modern slavery statement (**statement**) is made by Toga Pty Ltd ACN 000 926 947 (**Toga Pty Ltd**), being the parent company of the TOGA group of companies (**TOGA**) pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**) for the financial year of 1 July 2024 to 30 June 2025 (**reporting period**). Toga Pty Ltd is a reporting entity pursuant to section 5 of the Act.

The purpose of this statement is to outline TOGA's approach to minimising the risk of modern slavery in our business operations and supply chains. The statement sets out the actions taken by TOGA during the reporting period to reduce the risk of modern slavery practices in our business operations and supply chains as well as how TOGA intends to continually improve its processes.

At TOGA, we are committed to ensuring that modern slavery has no place within our operations or supply chains. We recognise the importance of addressing this global issue and take our responsibility seriously in combating modern slavery in all its forms. This statement outlines our approach to preventing and mitigating the risk of modern slavery, as well as our ongoing efforts to promote transparency and accountability. We strive to operate in an industry that is free from exploitation, where all individuals are treated with dignity and respect. TOGA is committed to reducing the risks of modern slavery in our business operations and supply chains and to responding to incidents should they occur.

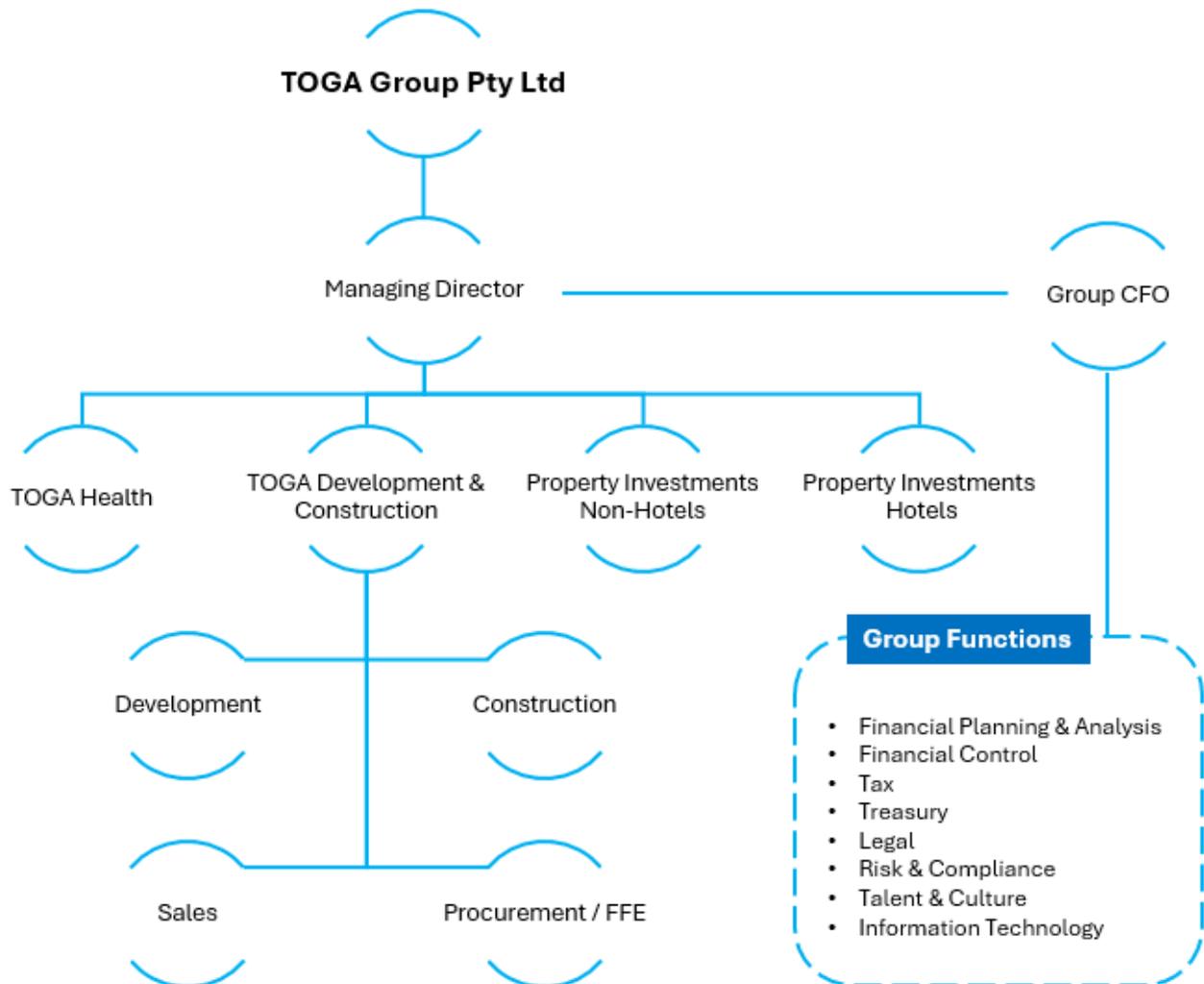


OUR STRUCTURE AND OPERATIONS

TOGA is a fully integrated development, construction, Furniture, Fittings & Equipment (FF&E) procurement and property investment business which was established in 1963. During the year, we established TOGA Health, to address the need for a new model of mental healthcare in Australia. As at 30 June 2025, TOGA Health had not commenced operations.

TOGA is a family company built on a strong foundation of values which are the guiding principles for the way we work.

The following organisational chart shows how TOGA operates:



TOGA's workforce is mostly comprised of skilled workers who are either located at TOGA's head office, at remote offices set up on TOGA's construction sites, or at our investment properties. Our team members' capabilities range from site selection, land acquisition, concept planning and design, property development,



project management, asset management, construction and sales, leasing and marketing. Across our Group functions, we have qualified specialists in their respective fields dedicated to supporting our operations.

TOGA comprises a range of entities which contributed to its annual consolidated revenue as at 30 June 2025. The key entities comprising TOGA include:

- Toga Pty Ltd ACN 000 926 947– Toga Group Finance entity (56 employees)
- Toga Cranes Pty Ltd ACN 655 082 189 (0 employees)
- Toga Project Services Pty Ltd ACN 000 965 515 – Provision of construction development and project management services (42 employees)
- Toga Constructions NSW Pty Ltd ACN 143 154 045 – NSW Construction entity (48 employees)
- Toga Corporate Real Estate Operations Pty Ltd ACN 675 232 578 – Asset Management entity (6 employees)
- Robert Edwards Real Estate Pty Ltd ACN 000 605 818 – operating entity for Toga Sales & Leasing (5 employees)

TOGA has an investment in TFE Hotels, a joint venture with Singapore’s Far East Orchard Limited, which is an international hotel group, headquartered in Australia, with operations in Australia, New Zealand and Europe (Germany, Denmark, Austria, Switzerland and Hungary). TFE commenced operations in the UK in November 2025. TFE Hotels has its own Modern Slavery Statement.

OUR SUPPLY CHAINS

TOGA’s business involves the following primary supply chains:

1. Consultants including architects, structural, services, façade, environmental and geotechnical involved in the design process.
2. Contractors and subcontractors including structural, plumbing, electrical, mechanical, waterproofing, early works, and demolition trades.
3. Suppliers of goods, services, and materials for all stages of the construction as well as asset management.
4. Suppliers and manufacturers of FF&E.
5. Sales agents for residential apartments as well as conjunction agents, marketing, and PR firms.
6. Ownership and management of commercial and retail premises and hotels, including facilities management, security, and property managers.
7. Information technology infrastructure and services.
8. Professional services including legal, tax, accounting, audit and insurance.
9. Outsourced offshore services such as accounts payable, treasury and IT support services.

WHAT ARE THE RISKS

TOGA’s developments are located in Australia where there is a strong legal framework, minimum wage laws, regulations governing workplaces and a robust labour market.

While the risk of modern slavery may be less extreme in Australia compared to other countries, TOGA recognises that the risk of modern slavery and exploitation does exist within Australia and that ongoing efforts are required to effectively identify, prevent and address modern slavery in all its forms.



Notwithstanding the above, the property development and construction industry has certain components which are assessed to have a higher risk of modern slavery practices including where our operations may be connected to activities of suppliers of goods and labour with whom we have a business relationship.

The areas of TOGA which are assessed to have a higher risk of modern slavery practices are primarily associated to our Tier 2 supply chain. This includes the risk of work being undertaken by unskilled/migrant labour engaged by the contractor/supplier, or materials from suppliers that are imported from countries where modern slavery practices might exist.

In this reporting period, TOGA has continued to assess its operations and supply chains and confirm the following areas in our operations and supply chains are at risk of modern slavery practices:

Area of Operation	Potential Risks
 <p data-bbox="363 936 842 974">Contractors & sub-contractors</p>	<ul data-bbox="890 891 1268 1025" style="list-style-type: none"> • Low skilled workers • Temporary, casual and part-time workers • Migrant workers • Undeclared labour • Excessive working hours • Exploitation of vulnerable workers
 <p data-bbox="368 1122 836 1193">Suppliers of goods, services & materials</p>	<ul data-bbox="890 1126 1209 1193" style="list-style-type: none"> • Compliance with local labour laws • Instances of forced labour • Exploitation of vulnerable workers
 <p data-bbox="456 1339 751 1377">FF&E procurement</p>	<ul data-bbox="890 1328 1209 1395" style="list-style-type: none"> • Compliance with local labour laws • Instance of forced labour • Exploitation of vulnerable workers
 <p data-bbox="373 1541 831 1579">Outsourced offshore services</p>	<ul data-bbox="890 1529 1209 1597" style="list-style-type: none"> • Compliance with local labour laws • Instance of forced labour • Exploitation of vulnerable workers



ACTIONS TAKEN

TOGA has always been guided by the simple principle of “doing the right thing”. We have established strong policies and processes over the more than 60 years we have been operating. 2025 has seen continued improvement in our risk management capability. We are working across all elements of our third-party risk management framework to better engage with our partners.

The following illustrates our target state position that we are working towards.



The following provides an overview of policies and processes we already have in place and are continuing to strengthen.

- POLICIES** – policies are easily available to all team members on the Group’s intranet and updated annually, including:
 - Code of Business Conduct and Ethics**
 - TOGA Modern Slavery Policy Statement** – High level policy statement outlining TOGA’s position on modern slavery.
 - TOGA Risk Management Policy** – Ensures we have structured approach to identifying and addressing risks across our operations.
 - Work, Health and Safety Policy** – Implements and maintains mandatory safe working conditions for all team members and contractors.



- **Appropriate Workplace Behaviour Policy** – Prohibits workplace bullying, harassment, or discrimination in any form.
- **Anti-Corruption, Bribery and Political Donations Policy** - Prohibits any activities associated with corruption or bribery and setting clear criteria for permissible political donations.
- **Whistleblowing Policy** – Sets out TOGA’s commitment to the reporting and investigation of misconduct or improper situation and provides employees, supply chain participants, and our clients the opportunity to report suspected instances of human rights violations anonymously and with appropriate protection.
- **Procurement Policy** – Employees making commercial commitments on TOGA’s behalf must:
 - Seek to reduce adverse social and environmental impacts from the supply chain; and
 - Take reasonable steps to ensure that people in the supply chain are treated with respect, have adequate working conditions, and work in a safe and healthy environment.
- **Contractors and Subcontractors Policy** – Outlines policies regarding performance on human rights, health & safety and environmental issues when engaging contractors, and applies TOGA policies to its contractors (including suppliers)
 - Requires all contractors and subcontractors to comply with applicable Australian and international laws regarding employment practices and benefits, anti-discrimination and work, health and safety.
 - Requires contractors to ensure that they do not, and that their supply chain does not, engage in any ‘modern slavery’ practices including forced labour, exploitation, debt bondage and deceptive recruiting for labour or services.

These Policies set the tone for how business is conducted, how disclosures can be made and how TOGA will respond.

2. CONTRACTUAL DOCUMENTATION - TOGA continues to require suppliers to provide:

- **Modern Slavery Statement** detailing the steps they have taken to minimise modern slavery practices within their own supply chain.
- **Minimum Supply Requirements** upon tender which include minimum mandatory HSE, community, human and business conduct requirements.
- **Self-Assessment Questionnaire (SAQ)** upon execution of any contract with TOGA to assist suppliers to identify types of modern slavery related risk, collaborate with customers to address these risks, improve transparency across shared supply chains and identify areas for further due diligence.
- **Independent Certification** if they are deemed high risk due to the location or products they supply.

Contractual terms and arrangements ensure all Contracting documents incorporate Modern Slavery compliance and reporting obligations including (but not limited to) setting out TOGA’s expectations and clarification of the notification process if a subcontractor or supplier becomes aware of a modern slavery risks.



3. REPUTABLE SUPPLIERS

The development of long-standing relationships with reputable suppliers over the more than 60 years of trading has allowed TOGA to have a greater understanding of the culture and practices of our suppliers and more easily identify where the risk of modern slavery practices may exist. We engage a family of sub-contractors who are assessed before, during and after each project to ensure they provide high quality services, including well established safety, quality and labour practices. We aim to set realistic cost targets and delivery timeframes for all sub-contractors and suppliers in our supply chain.

Our subcontractor and supplier selection process remains the focus of complying with government mandated standards and WHSE requirements aligned to our social and environmental values.

Our outsourced offshore services are located in India which has a vulnerable population and is high risk for modern slavery practices. Accordingly, we have engaged a tier-one service provider under strict contractual obligations in relation to compliance with applicable laws and who has pro-actively issued a global modern slavery statement detailing the full extent of safeguards it has in place to prevent modern slavery in its supply chain and operations.

4. ONGOING ENGAGEMENT WITH SUPPLIERS

During the reporting period, TOGA business units continued to review their respective supply chains including considering the geography, industry and workforce and took opportunities to engage with suppliers. Examples of this include:

- Members of TOGA FF&E team continued to visit a number of our furniture, stone and branded accessory supplier facilities and warehouses overseas (including China) during the year.
- Our construction teams ensure all suppliers are assessed and provide attestations as to their modern slavery practices. Where uncertainty exists, our teams will undertake further due diligence which may include site visits to confirm representations made as part of the contracting process.
- Our finance team continues to engage with local representatives of our offshore service providers and, where required, conduct site visits.

Visits to suppliers and service providers assists with mitigating modern slavery risks in the following ways:

- Providing firsthand visibility into the working conditions of employees and enabling a transparent assessment of workplace safety, sanitation and general labour conditions.
- Allowing direct access to employees to gauge their job satisfaction.
- Meaningful engagement with the supplier which invites the opportunity to discuss a shared commitment to ethical sourcing.
- An opportunity for general due diligence, audit and compliance checks.

5. INTERNAL AUDITS & BUSINESS ASSURANCE



Our payroll ensures that remuneration for all employees plus legal entitlements are paid and checked against the Fair Work pay calculator.

6. GOVERNANCE, RISK & COMPLIANCE (GRC) CAPABILITIES

We continue to invest in GRC capabilities across TOGA. During the year we strengthened capabilities across our Risk & Compliance, Technology and Talent & Culture teams which provide support and oversight over both our workforce and engagement with suppliers and third party partners.

7. EDUCATION

We continue to train all staff to increase their awareness of risks of modern slavery both in our supply chain and on construction sites and information on how to report.

Our core training to all employees which, among other aims, addresses the risks associated with modern slavery includes:

- Code of Conduct.
- Modern Slavery.
- Respect @ TOGA – Respectful and safe workplace behaviour

Training equips employees with the necessary tools to recognise red flags such as irregular working conditions, restricted freedom of movement or withholding of identification documents. It also educates employees on the various forms of modern slavery. By rolling out training to all staff, TOGA aims to promote a culture of vigilance and responsibility within the organisation as the training encourages employees to report any suspicions or concerns, they may have and in turn creating a supportive environment for disclosure. This information can then be used to investigate and address potential cases of modern slavery effectively.

ASSESSING THE EFFECTIVENESS

The entire framework is subject to continuous improvement and evaluated by Senior Management to assess effectiveness and strategies to implement improvements accordingly.

Our incident report register enables fast and accurate reporting, which includes:

- Date reported.
- How the incident report was received.
- Nature of the matter.
- Status of the matter.
- Who is responsible for investigation and developing policy responses.

Employees may also report directly to their manager, the Group General Counsel, Group General Manager (Risk & Compliance) or in accordance with our Whistleblowing Policy. Suppliers and contractors are contractually obliged to notify us upon becoming aware of any actual or suspected modern slavery practices in connection with the performance of their work. Any matters identified would then be appropriately investigated, reported and actions designed to resolve any instances of Modern slavery practices.



We continue to work collaboratively with our peers to educate and understand what we can do both as a company as well as an industry.

No instances of modern slavery have been identified during the financial year ending 30 June 2025 in TOGA's operations and supply chain. We will continue to monitor and assess our actions to address modern slavery risks and take necessary action in response to risks that are identified.

CONSULTATION PROCESS WITH SUBSIDIARIES IN PREPARING THIS STATEMENT

TOGA maintains one leadership team across each of its subsidiaries and there is therefore one management team responsible for coordinating TOGA's response to modern slavery risks in its operations and supply chains.

OUR FUTURE PLANS

TOGA's efforts to date have been focused on our risk identification, governance and establishing our internal understanding of modern slavery risks relevant to our business operations.

We recognise that eliminating modern slavery practices in the property development and construction industry is an ongoing long-term goal that requires a commitment to continuous improvement and a focus on implementing well considered effective priorities and plans.

Our roadmap has identified the following priorities and initiatives for the financial year ended 30 June 2026 (FY26).

- **Risk governance** – our Risk & Compliance Committee has been expanded to ensure representation from all areas of our business. A continued key focus of the committee for FY26 is management of our third-party risk including the risk of modern slavery across our supply chain.
- **Risk management capability** – we're continuing to invest in our risk management capability to provide further support to our leaders in identifying risks including modern slavery risks and managing them proactively.
- **Third party risk management** – we're consolidating our third-party risk management activities to ensure we address all risks associated with the products and services provided by our business partners including risks of modern slavery.
- **Supply chain risk management** – we're analysing our supply chain to better understand the potential for modern slavery across our operations. We'll engage with those key suppliers in a more collaborative way to provide us greater comfort that appropriate practices are in place to minimise the risk of modern slavery.
- **Technology** - We're investing in key systems across GRC, Contract Management and Artificial Intelligence capabilities that will enable us to more effectively monitor and manage risks associated with our third-party relationships and supply chains. We're also implementing an improved Human Resources Information System (HRIS) with integrated learning and development which enables better engagement with and training of our workforce.



APPROVAL

This Modern Slavery Statement was approved by the Board of Toga Pty Ltd on 24 December 2025 for lodgment on the Register.

Allan Vidor AM
Managing Director, TOGA
24 December 2025