MODERN SLAVERY STATEMENT

This is a statement for the Financial Year Ending 30 June 2023 on behalf of:

Salta Properties Pty Ltd as Trustee for Tarascio No 2 Family Trust

ABN: 28 166 343 301



ACKNOWLEDGEMENT OF COUNTRY

In the spirit of reconciliation, Salta Properties would like to acknowledge the Traditional Custodians of the land and pay respect to Elders past and present. We acknowledge all Aboriginal and Torres Strait Islander people and recognise their connection to land and waters and their role in caring for and maintaining Country over thousands of years.



ABOUT THIS STATEMENT

This is Salta's second year reporting on modern slavery, our strategy, and progress on modern slavery risks in our operations and supply chain. This statement captures the steps that we have taken to assess, address and remedy the presence of potential modern slavery in Salta's operations and supply chains during the period of the 1 July 2022 to 30 June 2023 (FY23).

Our Modern Slavery Statement addresses the mandatory reporting criteria specified in Section 16 (1a-1g) and addresses the compliance feedback provided by the Minister on our previous statement, in accordance with the Modern Slavery Act 2018 (Cth) (the Act).

Section 14 applies to our Company structure; therefore, this is a joint modern slavery statement on behalf of the following reporting entities owned and controlled by the business, which share the same Board and Managing Director as Salta Properties:

- Salta Properties Pty Ltd as Trustee for Tarascio No 2 Family Trust (ABN 28 166 343 301)
- The trustee for Salta Asset Management Trust (ABN 92 197 852 502)
- Space Estate Agents Pty Ltd (ABN 38 167 697 136)

These entities and their suppliers were assessed, actively engaged, trained in modern slavery risks, and consulted during the reporting period.

This report includes forward-looking statements that are not guarantees and can be identified by the reader when the forward-looking statements contains words such as "believes," "expects," "may," "will," "seeks," "intends," "plans," "estimates," or similar expressions which concern the Company's strategy, plans, projections, or intentions.

The Board of Salta Properties Pty Ltd, Salta Asset Management Trust and Space Estate Agents Pty Ltd approved this statement 19th December 2023.

Sam Tarascio Managing Director, Salta Properties

A MESSAGE FROM OUR MANAGING DIRECTOR

2023 is a year to celebrate for Salta, as we mark over 50 years of operations. Through that half a century, even though we have grown to become one of Australia's largest privately owned businesses, we have remained as much a family business as when my father started Salta in the 70s.

Melbourne and Australia have gone through great changes during those five decades, but our commitment to create people focused spaces we are proud of remains the same.

Ensuring the wellbeing of our people, the people who do business with us and the larger community has,



from the very beginning, been a fundamental aspect of our vision as a company and is the key to the legacy we will leave for future generations.

That focus has been the motivation for arriving at another marker this year as we reach a figure of \$1.2 M invested in sustainability. As part of that effort, I am proud to present this report detailing the work Salta has been doing in order to prevent instances of Modern Slavery not only in our immediate surroundings, but also along our supply chain all over the world.

Salta is working with the property industry in addressing this extremely complicated and important subject. Even though the work is only beginning, I am excited to present you with our progress so far.

Sam Tarascio Managing Director, Salta Properties

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1.ABOUT SALTA PROPERTIES

Salta Properties is one of Australia's largest privately owned companies, with a property portfolio valued in excess of \$2 billion comprising over 50 commercial, retail, and industrial assets in Melbourne's metropolitan area at a combined Net Lettable Area (NLA) approaching 500,000 m².

Salta Properties owns and controls the following entities covered by this statement:

- Salta Properties Pty Ltd as Trustee for Tarascio No 2 Family Trust (ABN 28 166 343 301)
- The trustee for Salta Asset Management Trust (ABN 92 197 852 502)
- Space Estate Agents Pty Ltd (ABN 38 167 697 136)

Despite its success, Salta remains at heart a family business, with strong values now passed down to its second generation of management. Driven by strong ethics and high standards, Salta believes in building long-term partnerships with its clients and positive community engagement in every project.

Across a vast legacy in various sectors, what every Salta project shares is genuine pride. The name Salta Properties represents a considered and crafted approach, with a commitment to growth and stability long into the future.

At Salta Properties we are committed to building outstanding commercial, industrial, retail, residential and hotel properties that not only reflect who we are and what we stand for, but also the socially and environmentally aware companies who choose to call us home.

We believe our actions today will have an impact for generations to come. Therefore, at Salta we regard sustainability and wellbeing as our legacy for the future. Our sustainability strategy is guided by the UN Sustainable Development Goals and consists of four Pillars:

- 1. Healthy & Connected People
- 2. Climate Action & Resilience
- 3. Nature Positive
- 4. Equity for All

Salta recognises that Modern Slavery is a serious global issue and one that requires an effective societal response from business leaders that strengthens over time. Salta also understands that it has a role in this response and a responsibility to generate awareness and implement steps to uphold human rights and minimise the risk of modern slavery practices occurring in its operations and supply chains.

2.OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Our Structure

Salta is an Australian owned and managed property development company that operates solely in Australia.

Salta Properties owns and controls the following entities covered by this statement:

- Salta Properties Pty Ltd as Trustee for Tarascio No 2 Family Trust (ABN 28 166 343 301)
- The trustee for Salta Asset Management Trust (ABN 92 197 852 502)
- Space Estate Agents Pty Ltd (ABN 38 167 697 136)

Salta Properties' core business consists of 100 employees. Salta Asset Management operates in the same office as Salta Properties and all of their 22 staff are Salta Properties employees. Space Estate Agent works closely with Salta Asset Management. Their office in Richmond has 4 employees dedicated to leasing and tenant management. The three entities share the same Managing Director, Chief Operating Officer, Board and Senior Leadership Team.

Our governance structure and policies apply to all entities owned and controlled by Salta Properties.



Figure 1. Salta Properties business structure

The Sustainability team manages the Modern Slavery Risk strategy and is supported by the Salta ESG Committee and the Board.

The Salta ESG Committee consists of a diverse group of ten high level staff members, each operating in different areas within the organisation, that meets every two months. The Committee oversees and participates in the development of our sustainability strategy.

Our Operations

In this statement 'operations' means the activities undertaken by Salta, or an entity owned or controlled by Salta, to pursue business objectives and strategy.

Salta Properties operates in Melbourne, Australia. Our operations encompass the acquisition, management, administration, leasing, development, and disposal of property assets, with our operations undertaken by an inhouse team of legal, asset, facilities, project, finance, and property professionals.

- Our products and services include:
- Residential property development for sale
- Office property development for lease
- Retail property development for lease
- Industrial property development for lease
- Hotel & accommodation development
- Build-to-rent residential accommodation
- Capital investment
- Asset management
- Property management

Salta Asset Management manages the properties in our investment portfolio and Space Estate Agents are the property agents for residential properties owned by Salta and other landlords.

Our Supply Chain

In this Statement 'supply chain' means the products and services, including third-party labour hire, that contribute to the products and services to Salta, or an entity owned or controlled by Salta. This includes products and services sourced domestically or overseas and extends beyond direct suppliers.

As developers and managers of property assets, the greatest expenditure and exposure to modern slavery practices resides in the supply chains of our service providers and the goods and materials they supply in the construction, maintenance, repair, and operations of these properties.

SALTA ENTITY	RESPONSIBILITY	SOURCING	HIGH-RISK CONTRACTORS
Salta Properties	Engaging the head contractors/builders for our construction projects	Supplier engagement for core business	Builders
Salta Asset Management	Managing the properties in our investment portfolio	Different set of suppliers to Salta Properties	Repairs and maintenance, cleaners
Space Estate Agents	Tenant management and leasing	Same suppliers as Salta Properties for their operations and premises, and different contractors on behalf of their clients	Repairs and maintenance, cleaners

We have mapped our supply chain for all entities covered by this statement and given them a risk category from 1 to 3, with 1 representing the highest risk. Every reporting period we review our contractors list and rank them based on supply chain expenditure and modern slavery risk exposure during this reporting period.

3.OUR APPROACH - MODERN SLAVERY RISK IDENTIFICATION AND ASSESSMENT

In this Statement, 'Tier 1' represents suppliers engaged directly by our business, 'Tier 2' includes suppliers to our Tier 1 suppliers, including subcontractors, and 'Tier 3' involves the suppliers of the Tier 2 suppliers. The increase in Tier indicates a decrease in control and visibility by our business on the suppliers' practices.

Salta Properties, the entities covered by this statement and their suppliers were assessed, consulted with, actively engaged, and trained in modern slavery risks during the reporting period.

Modern slavery involves a series of serious exploitative practices, such as human trafficking, deceptive recruiting, debt bondage, forced labour and forced marriage.

We recognise that the highest modern slavery risks in our operations in Australia may lie in the labour hiring process by Tier 1 and Tier 2 contractors. We are aware subcontracting and informalities with workers' contracts can be a common practice in the construction, cleaning and repairs and maintenance sectors.

Uncovering Tier 3 modern slavery risks continues to be a challenge as we do not have enough visibility on the working conditions involved in making the products sourced by our suppliers overseas. We explored the idea of subscribing to one of the existing platforms that aims to facilitate human rights due diligence but found a lack of data on our industry suppliers and as such this would not meet our requirements.

4.OUR ACTIONS SO FAR

Starting in FY21, Salta has conducted due diligence on modern slavery risks on our operations and supply chain on a voluntary capacity. During this period, we actively sought to gain a high-level understanding of modern slavery issues in our industry and to evaluate where the risks could lie. Our first mandatory statement was released in December 2022 and captured the early steps taken during FY22 in assessing and addressing the potential presence of modern slavery in Salta's operations and supply chains.

That was the starting point for a series of initiatives that seek to identify, minimise and tackle modern slavery risks with our suppliers and contractors. The list below is a high-level summary of those initiatives, while a more detailed account of each point is outlined later in this report.

- Suppliers review:
 - Mapping of our supply chain and annual reviews of vendors based on modern slavery risk and expenditure.
 - Review of published Modern Slavery Statements by our suppliers as part of our due diligence process.
- Consultation process involving high-risk migrant workers.
- Development a of a Suppliers Questionnaire based on best practice and refined through consultation.
 - o Refined year-on-year to remove ambiguity and improve the quality of suppliers' responses.
 - Formulation of questions specific to construction, cleaning services, construction, and asset management sectors.
 - Inclusion of questions targeting Tier 3 suppliers.
- Development of Salta Modern Slavery Training Material and its distribution to Salta personnel and suppliers.
- Modern Slavery spot checks inclusion into OH&S inspections.
- Leadership participation in industry events and collaboration with key industry bodies.
- Issuing of new company policies in line with Salta's commitment to human rights.

Suppliers Review

In FY22, we mapped the supply chain for all entities covered by this statement and categorised from 1 to 3 according to risk, with 1 having the highest risk.

We identified 33 contractors with whom we spent over \$50,000 during FY23 across all the entities, which represents 86% of our total expenditure. We have also included the regular cleaning contractor for Space Estate Agents despite falling below the \$50k threshold, as cleaning services is one of our high-risk areas. Our highest supply chain expenditure and modern slavery risk exposure during this reporting period were:

- Building contractors 83%
- Asset management contractors (repairs and maintenance) 2.5%
- Cleaning services contractors 1%

All contractors are based in Australia and 13 out of the 33 had published a Modern Slavery Statement on the Register. All contractors fall into Category 1 in our modern slavery risk assessment.

Suppliers' Questionnaire

Salta has developed a modern slavery questionnaire in consultation with stakeholders to effectively identify potential risks in contractors' practices, increase modern slavery awareness and communicate our expectations prior to a formal engagement. This enables us to embed these considerations into our procurement process and categorise suppliers based on their inherent risk of modern slavery.

Through questioning and categorising suppliers, Salta is able to influence their attitude towards modern slavery policy. The questionnaire aims to assess vendors' performance in the following criteria:

- Understanding of the concept and risks of modern slavery and human rights.
- Labour engagement and recruitment practices, including indirect labour hire, subcontracting and use of foreign or migrant labour.
- Worker remuneration compliance with the Fair Work Act 2009
- Labour rights and freedom of association
- Policies and compliance
- Modern slavery due diligence
- Current approach to supply chain management
- Worker dialogue
- Level of engagement and supply chain visibility
- Performance, remediation and effectiveness

The questionnaire is distributed to prospective suppliers and those already under contract as part of the due diligence process and the results inform the ongoing monitoring and engagement.

Since its implementation, the Suppliers Questionnaire has become the key due diligence tool for understanding the modern slavery risks surrounding our business, so it is important to continue to build on and refine it further.

Case Study: Salta's Supplier Questionnaire Consultation Process and Outcomes

Based on the responses we obtained from our suppliers in FY22, we learnt that the original questionnaire, although based on best practices, needed to be refined towards addressing issues specific to the particularities of our supply chain. To this end, we began a consultation process involving the industries that represent a higher proportion of our procurement budget or a higher modern slavery risk.

This included anonymous volunteer interviews with high-risk workers, identified as those on temporary visas, in the construction and cleaning services industries. These conversations allowed us to better understand common risks from a firsthand insider perspective and uncover loopholes that would otherwise not be visible to us.

One of the recurring subjects during the consultation with construction labourers was the potential exposure to unfair work practices when hired through third-party agencies. This implies the contractors in our supply chain that use recruitment agencies are removed from the working arrangement of individuals on our sites and may be unaware of possible risks of exploitation and modern slavery.

During these conversations we learnt it is common practice to register labourers with an Australian Business Number (ABN) rather than with a Tax File Number (TFN). The latter workers are considered employees, even if on a casual or temporary basis, while the former are known as contractors.

This may result in risks for labourers, especially migrants, in a few different ways:

- Workers often do not have clarity on their rights, including accident insurance coverage or freedom of association.
- Because the supplier pays the labour hire agency and the labour hire agency then pays the worker, the supplier has no direct control over the remuneration.
- Workers are often not aware that, unlike TFN employees whose tax and super contributions are withheld from their paycheques, they must pay tax at the end of the financial year. They will often fail to save, and the large financial hit may push them into debt.
- Contractors hired by an agency will sometimes recruit from their migrant communities and act as intermediaries by informally sub-contracting for the work. This results in yet another layer of removal from the host employer and a dilution in their take-home pay.

Based on these findings, we added new questions related to employment status to the Salta Supplier Questionnaire, allowing us to map the use of third-party hiring agencies in our supply chain.

Another insight we gained from these interviews was that non-English speakers may often sign documents without being able to understand them. As a result we intend to place multilingual information posters at all our construction sites informing non-English speakers on modern slavery risks and the contact details for the Australian Government free Translating and Interpreting Services (TIS National).

Changes to the questionnaire in FY23

During this reporting period, we reviewed last year's questionnaire responses and factored in the feedback gathered during our consultation. We added 12 new questions, including two focusing on Tier 3 suppliers.

Some of the new questions are:

Q18. Do you allow individuals operating on ABNs to informally sub-contract workers on your projects?

Q19. Excluding administrative and office workers, what percentage of individuals in your workforce (including subcontractors, agency hires or casual workers) operate under an Australian Business Number (ABN) as opposed to a Tax File Number (TFN)?

Q48. Has your organisation published a Modern Slavery Statement?

Some questions were rephrased to emphasise our human rights expectation. For example, Q59, 'Does your organisation recognise your employees' right to join and be represented by their union?', was edited to say, 'Do you acknowledge your employees' right of freedom of association and allow them to join and be represented by their union?'.

Salta Properties Completes its Own Supplier Questionnaire

With the goal of testing our own position as suppliers for our own customers, Salta's Head of Human Resources completed our own Supplier's Questionnaire. This exercise helped us identify the following areas of potential improvement:

- We should request evidence from third-party labour hire contractors proving workers were provided with copies of the following documents at the time of engagement:
 - The Fair Work Information Statement advising them of their rights under National Employment Standards;
 - o Safe Work Australia's Working Safely in Australia factsheet; and
 - o The Fair Work contractors and employees what's the difference factsheet?
- Our policies and contracts could be more explicit regarding our minimum requirements on labour standards and prohibiting the use of forced labour. This will be addressed in our Human Rights policy.
- Our human rights, social responsibility, OH&S and/or other relevant policies should be communicated to suppliers and included in contracts as part of the service delivery expectations.
- We are not sure if any of your supplier's businesses have employees in high-risk countries including India, China, Pakistan, Bangladesh, Uzbekistan, North Korea, Sudan, South Sudan, Democratic Republic of Congo, Yemen, Somalia, Eritrea or Syria. And while we know most construction contractors source materials from China, we do not have visibility on worker conditions at this stage.

Integration to our Sustainability Strategy

Two of our four Sustainability Pillars relate to modern slavery: Healthy & Connected People and Equity for All. During FY23, Salta aimed to strengthen the former by issuing three new corporate policies:

- Salta Safe 'n Well OHS Policy
- Salta Safe 'n Well Psychological Safety Policy
- Salta Health & Wellbeing Policy

We have also begun the development of a Human Rights Policy to support our Equity for All Pillar, which will cover our modern slavery risks management approach.



Figure 2. Salta Properties Sustainability Pillars Mapping

Modern Slavery Training Material for staff and suppliers

Since the previous reporting period, our Modern Slavery Training Material has been used to proactively raise awareness companywide, including all entities covered by this statement. We have extended this material to our suppliers in conjunction with the survey to assist with identifying areas for improvement in their own systems and policies.

By the end of FY23 we continued this initiative by issuing the Modern Slavery Training Material to:

- Nine of our Salta Properties Project Management team members.
- Three of our Salta Asset Management team members.
- One of our Space Estate Agents team members.
- 38 of our Contractors.

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Figure 3. Table of Contents of 'Salta's Modern Slavery Training Material'

Salta Properties Modern Slavery Construction Spot Check

We have incorporated a modern slavery spot check task for OH&S inspectors at Salta's construction sites. The OH&S inspectors were briefed on our ongoing modern slavery due diligence and consulted on the proposed questions and methodology of the exercise. We have incorporated their feedback in the final version for the spot check survey, which will be rolled out in 2024.

Instructions include for the inspector to approach the site manager and at least one worker on site, and through conversation go over the modern slavery risks Spot Check Questionnaire so we can cross check their responses with the answers provided by their companies on the Suppliers' Questionnaire. We also request the inspectors look out for red flags in the workforce's appearance, health, and behaviour.

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Figure 4. Salta's Construction Spot Check Survey

Some examples of the information we will be collecting during the spot check are:

Q7. Is there an independent trade union representative on site?

Q8. Ask a worker if they were engaged through a labour hire agency. If so, ask for the agency's name.

Q14. Ask the site manager if training has been provided in the workplace on modern slavery and how to manage modern slavery issues.

Q17. Are there any workers who seem fearful or unwilling to engage with your inspection?

5.KEY OUTCOMES

- After updating the questionnaire for clarity, the number of contractors who conscientiously completed it rose by 18% in FY23.
- We have identified the contractors on which we need to focus our human rights due diligence, based on both expenditure and risk.
- By the end of this reporting period through direct consultation with migrant workers in the cleaning, construction, and repair and maintenance sectors, we have completed a thorough human rights due diligence on 86% of our supply chain.
- Our Modern Slavery Training Material has been distributed to 100% of our staff and existing contractors.
- Our Supplier Questionnaire is now incorporated in all tenders and has allowed us to de-risk our contractor engagement process.
- We have opened a dialogue on modern slavery issues internally and with suppliers, an important step to learn from our challenges, discuss possible solutions and improve collectively.
- We investigated platforms that aim to facilitate Tier 3 human rights due diligence mentioned in some of our contractors published Modern Slavery Statements. We learnt that not all of the members are active users or share their information on suppliers, which is key to building a robust database. On this basis we will modify our Supplier Questionnaire to further enquire how they are participating and using these platforms beyond simply holding a membership.
- Having taken feedback from migrant worker interviews, we will be placing multilingual posters in our construction sites with information of the Australian Government free Translating and Interpreting Services (TIS National).

6.OUR APPROACH - MODERN SLAVERY RISKS REMEDIATION & MONITORING

Whilst during FY23 there were no reports on modern slavery instances within our operations or sphere of influence, we acknowledge our responsibility is to continue informing our people, and those we do business with, on the issue of modern slavery and create more avenues to help minimise the risks poised to the most vulnerable workers.

Our main challenge lies in uncovering the Tier 2 and Tier 3 risks that are not currently visible to Salta. We recognise we need to continue working closely with experts and industries to create more avenues to gain a deeper understanding of these suppliers' operational practices. We investigated platforms that are meant to facilitate due diligence on Tier 3 suppliers, such as SEDEX, but concluded that at this stage they have insufficient data to guarantee solving our traceability issue.

We also need to continue creating avenues for workers to report potential incidents of abuse and educating our stakeholders on modern slavery so that risks can be identified and prevented more effectively.

Ongoing Consultation Process

We understand modern slavery is a serious issue that is only starting to be addressed in our industry and in Australia, and the collaborative approach is essential in order to make significant progress in mitigating this grave human rights risk.

We count on the support of our external consultants, ESG PLUS, who help us in the development of our modern slavery due diligence and monitoring, and on the strategy to de-risk the supply chain.

Our strategy and progress are part of the agenda of our ESG Committee bimonthly meeting, where we keep an ongoing dialogue on the subject with our staff and suppliers. Our progress is also reported bi-monthly to the Managing Director and COO. Modern slavery due diligence is now embedded in our ongoing operations.

7.OUR PUBLIC COMMITMENT

- Reporting annually on the Modern Slavery Statement register, signed by the board.
- Drafting new policies to cover our human rights due diligence and safeguard our approach and commitments.
- Modern slavery progress will be part of our annual Sustainability Report
- Communicating our Modern Slavery risks mitigation strategy to our internal team as well as to all contractors we engage through our Salta Training Material. This material is included at tender stage so contractors wishing to work with Salta are aware of our expectations from the start.

8.OUR 2024 AGENDA

We strive to continue making meaningful progress in monitoring and managing modern slavery risks in our operations and supply chain. This next FY24 we aim to make advancements in the following areas:

- Finalise Salta's Human Rights Policy, which will include our approach to managing modern slavery risks.
- Roll out the modern slavery spot checks at our construction sites with the OH&S Inspector and assess the information we will receive back.
- Expand the modern slavery spot checks to our existing buildings.
- Workshop an effective process for labourers to safely communicate modern slavery risks back to Salta.
- Release our Modern Slavery Training Material v.2.
- Choose one more of the higher risk industries to create a new industry-specific questionnaire.
- Review our own Supplier Questionnaire responses to find areas of improvement to meet our own standards.
- Monitor living wages against the continuous increase in cost of living and incorporate the findings into our due diligence process.

9.MODERN SLAVERY ACT 2018, SECTION 16 COMPLIANCE TRACKER

Modern Slavery Act 2018 (Cth) Section 16. Compliance Tracker				
Mandatory Criteria	Relevant Section(s) in our Salta Modern Slavery Statement 2023			
Criteria 1a. Identify the reporting entity	 Section About this statement Section 1. About Salta Properties Section 2. Our Structure, Operations and Supply Chain 			
Criteria 1b. Describe the structure, operations, and supply chains of the reporting entity	 Section 2. Our Structure, Operations and Supply Chain 			
Criteria 1c. describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	 Section 2. Our Structure, Operations and Supply Chain Section 3. Our Approach - Modern Slavery Risk Identification and Assessment Section 6. Our Approach - Modern Slavery Risks Remediation & Monitoring 			
Criteria 1d. describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	 Section 5. Key Outcomes Section 6. Our Approach - Modern Slavery Risks Remediation & Monitoring Section 7. Our Public Commitment Section 8. Our 2024 Agenda 			
Criteria 1e. describe how the reporting entity assesses the effectiveness of such actions	 Section 4. Our Actions So Far Section 5. Key Outcomes 			
Criteria 1f. describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a statement under section 14—the entity giving the statement	 Section About this Statement Section 1. About Salta Properties Section 2. Our Structure, Operations and Supply Chain Section 4. Our Actions So Far Section 7. Our Public Commitment 			
Criteria 1g. include any other information that the reporting entity, or the entity giving the statement, considers relevant. Example: For paragraph (d), actions taken by an entity may include the development of policies and processes to address modern slavery risks and providing training for staff about modern slavery.	 Section 4. Our Actions So Far Section 7. Our Public Commitment Section 8. Our 2024 Agenda 			



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