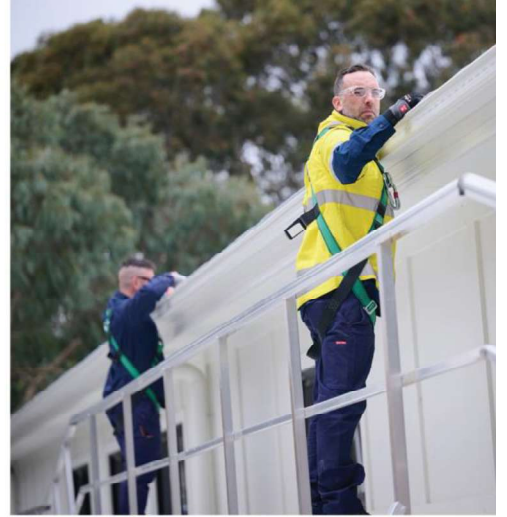
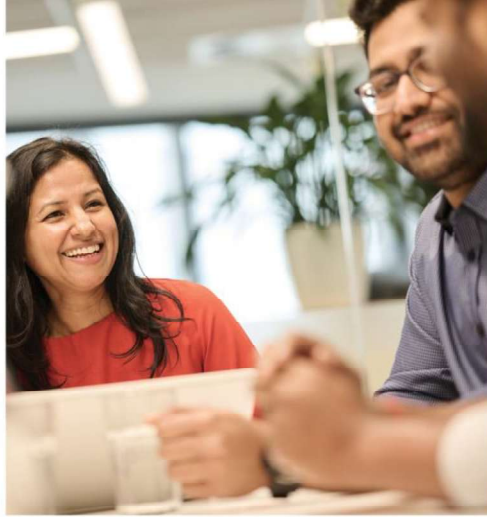
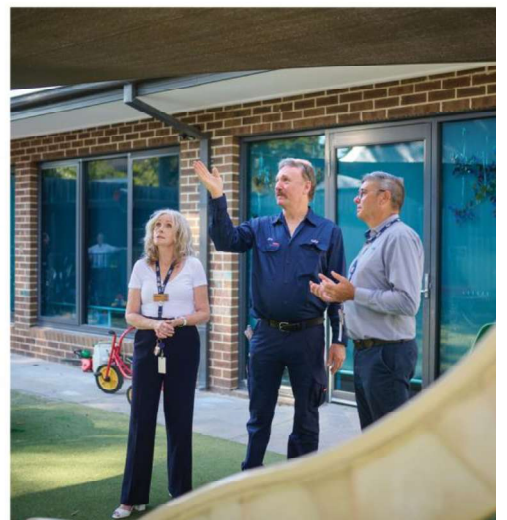
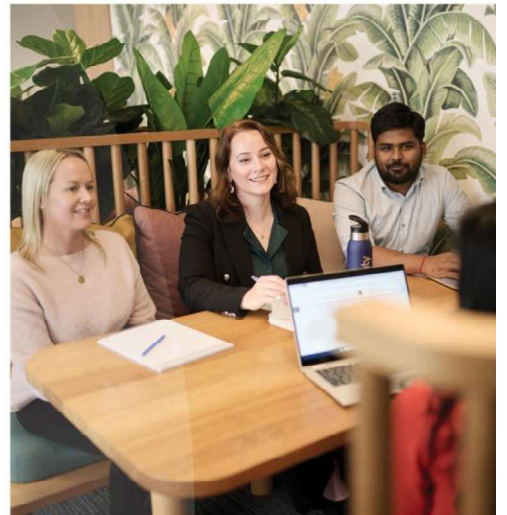




Modern Slavery Statement

Period 1 Jan – 31 Dec 2025
(FY 2025)

SMARTER TOGETHER





A message from our CEO

At City, we recognise the impacts that larger businesses have on important social issues like Modern Slavery.

Our Executive Leadership Team welcomes the responsibility of ensuring that all our business operations are conducted ethically and with integrity.

We have a zero-tolerance approach to modern slavery, and are committed to continually:

- Keeping abreast of appropriate legislation (Modern Slavery Act 2018)
- Assessing business risks associated with modern slavery
- Implementing and maintaining appropriate measures to minimise identified risks
- Educating and raising awareness of modern slavery amongst key stakeholder groups
- Facilitating open and safe communication channels across the entire business and supply chain

City understands the importance of initiatives like Modern Slavery Statements, and our sixth statement outlines how we will continue to maintain and improve our systems and controls to minimise the risk of modern slavery occurring in our business operations and supply chains.

A handwritten signature in black ink, appearing to read "Chris Winchester".

Chris Winchester
Chief Executive Officer

This Modern Slavery Statement was jointly prepared by the City Modern Slavery Working Group, endorsed by the City Board, and approved by the Chief Executive Officer. This statement is for the 1 January to 31 December 2025 financial year.





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1. About city and our operations

City Holdings (Aus) Pty Ltd (City) provides innovative facilities management services and solutions to retail and commercial partners across Australia. Our partners' (customer) sites include supermarkets, childcare centres, retail stores, automotive service centres, essential health centres, aged care centres, and quick service restaurants.

Our core facilities management services include reactive maintenance and planned preventative maintenance (PPM), security, cleaning, grounds maintenance, and waste management. Our partners can also leverage our additional, value-add professional and technical capabilities.

Our Services

Hard FM service

- Electrical, plumbing & RHVAC
- Building works
- Fire services
- Security equipment maintenance

Soft FM service

- Cleaning
- Grounds maintenance
- Waste management
- Security guarding & profit protection

Technical services

- Engineering (Mechanical, Electrical, & Building Controls)
- Energy Centre
- Technical Centre (Refrigeration Alarm Monitoring)
- Critical Incident Desk

Professional services

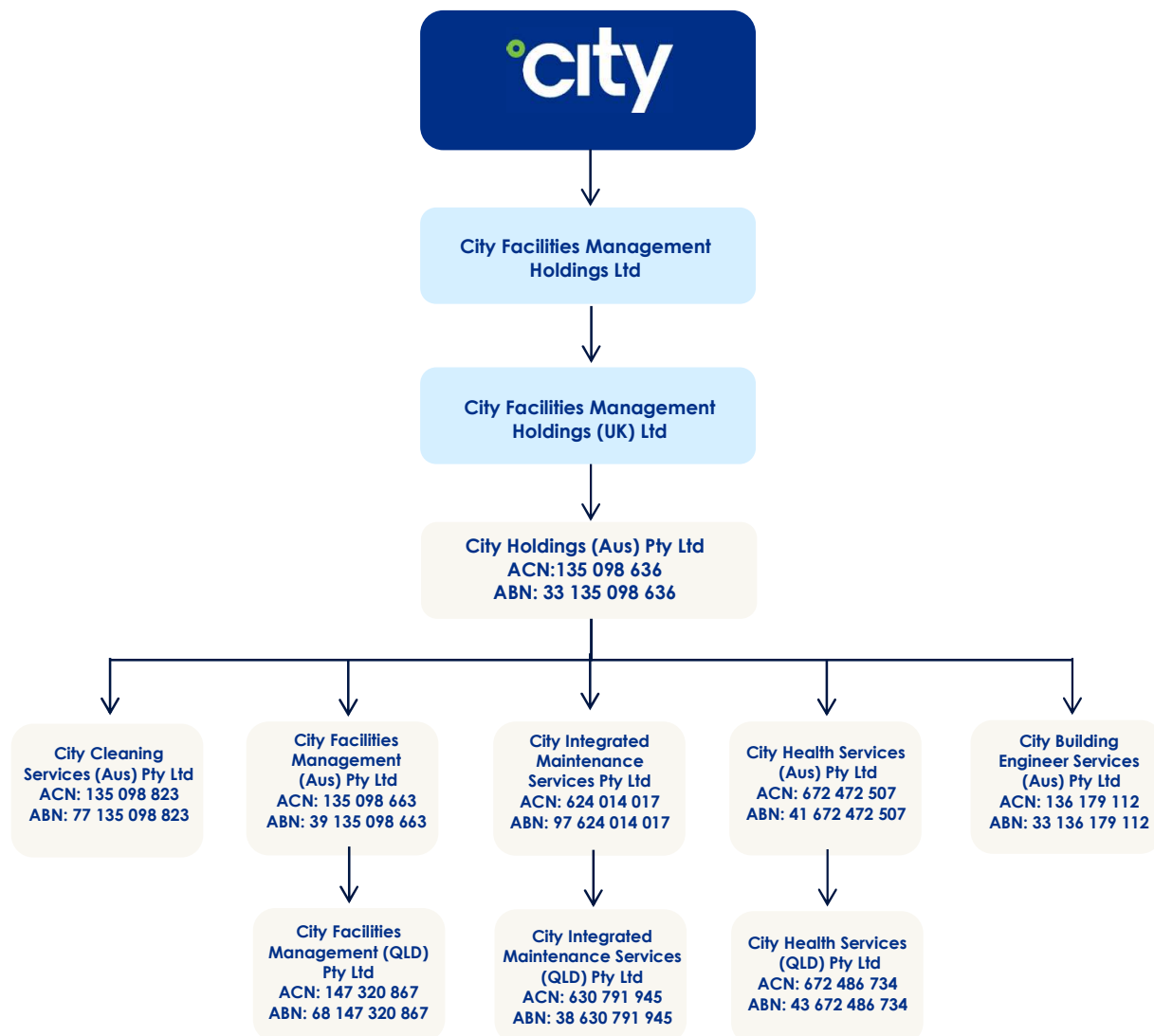
- IT Support & Application Development
- Asset Management
- Technical Procurement
- Project Management
- Landlord & Third-Party Recoveries

2. Our structure

City is a fully owned subsidiary of the UK-based City FM Group, with offices in Europe, Australia, Asia, and North America. Established by Lord and Lady Haughey in Glasgow, Scotland in 1985, the City FM Group is one of the largest privately-owned facilities management companies in the world.

Within Australia, City Holdings (Aus) Pty Ltd (City) has eight (8) controlled entities that are wholly owned by City, incorporated in Australia, and only operate in Australia. City, including all controlled entities, are managed and governed by the same Executive Leadership Team and Board, operating as one organisation branded as City.

The City entity structure is depicted below:



Our operations

City's head office is in Melbourne, with our registered address being:
10 Nexus Court Mulgrave, Victoria 3170 Australia.

City employ 2,526 team members in Australia (as of 31 December 2025), with roles broken down as follows:



298

Field Based Managers
& Non-technical



1855

Field Based
Technicians & Cleaners



373

Head office
team members

City's field-based team members perform facilities management services at partner (customer) sites throughout all states and territories of Australia, including metro and regional locations.



185,996 PPM jobs completed



689,264 reactive jobs completed



4,879 partner sites serviced



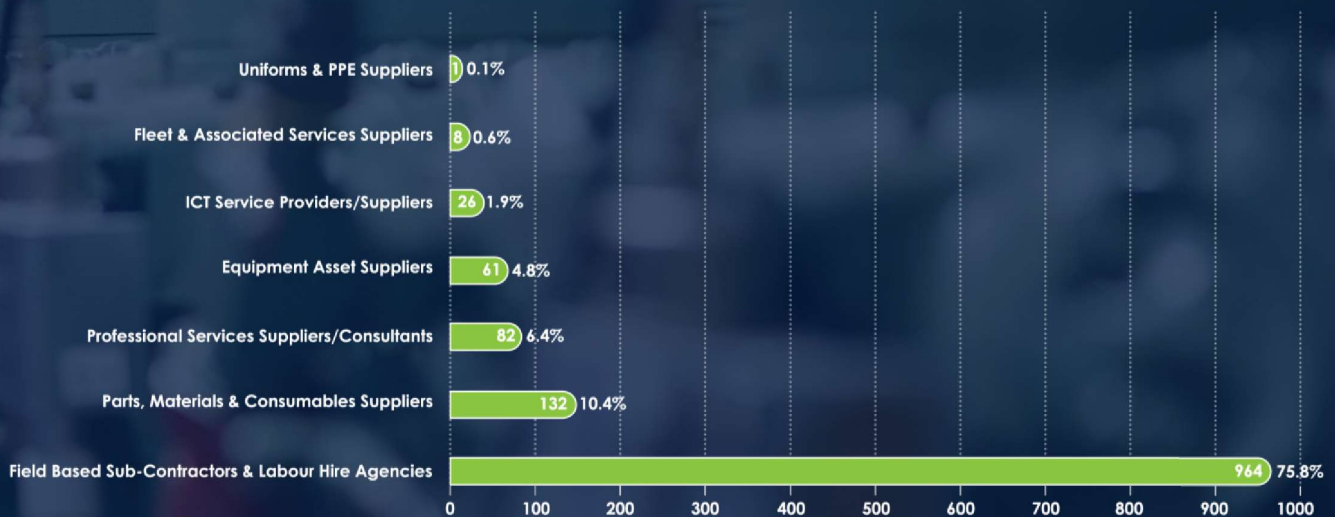
449,459 calls answered by Contact Centre

Our supply chain

City engages a broad base of sub-contractors and suppliers to enable the delivery of Facilities Management services to our partners. Just under 100% of City's direct sub-contractors and suppliers (tier 1 supply chain) are Australian based businesses (ABN/ACN provided), except for several IT service providers. Equipment, parts, and material suppliers are known to source some of their product from overseas regions such as Europe and Asia. City requires all sub-contractors and suppliers to comply to City's modern slavery expectations.

City's supply chain is broken down as follows:

Vendor Overview: Total Quantity and Percentage Spend by Supplier



Further supply chain/vendor information

Tier 1 Supply Chain/Vendor Category	Description of Goods or Services Provided by Vendor Category
Field-based Sub-Contractors & Labour Hire Agencies	Field-based contractor and labour hire workers such as licenced trade technicians, maintenance specialists, grounds maintenance, field supervisors, and cleaners working at Australian based partner-controlled sites performing FM reactive and planned preventative maintenance works
Equipment Asset Suppliers	Equipment (assets) such as commercial refrigeration units, HVAC systems, catering equipment, compressors, switchboards, etc.
Parts, Materials & Consumables Suppliers	Electrical, plumbing, refrigeration, HVAC, building, mechanical spare parts, materials and consumables, refrigerant gases, technician tools, etc.
Professional Services Suppliers/Consultants	Professional consulting services, training providers, recruitment consultants, test & calibration providers, etc.
Fleet & Associated Services Suppliers	Company vehicle fleet lease providers, vehicle fit-out providers, vehicle service providers, fuel providers, etc.
Facilities (Head Office) & Associated Utilities	Provision of City head office and associated costs (not accounted for in total vendor spend)
Uniforms and PPE Suppliers	Technician uniforms, PPE, etc.
ICT Service Providers/Suppliers	Cloud based infrastructure, IT systems & applications, electronic devices, etc.
City Asia - Global Support Services Team	Contact Centre after hours service, Accounts Payable processing, and IT support provided by City Asia (a related party entity, not accounted for in total vendor spend).

3. Risks in our operations and supply chain

In accordance with our Risk Management Framework, the City Modern Slavery Working Group have continued to identify and assess modern slavery risks related to our operations and supply chain. All modern slavery risks are categorised, recorded, and rated on a Modern Slavery Risk Register. An overview of our risk assessment approach is described below.



Risk indicators

The following indicators are reviewed to ensure potential modern slavery risks have been identified. Sourced from: modernslaveryregister.gov.au/resources/Commonwealth_Modern_Slavery_Act_Guidance.pdf

Type of Risk	Indicators of Modern Slavery
Sector and Industry Risks Certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes.	• Use of unskilled, temporary or seasonal labour • Use of short-term contracts and outsourcing • Use of foreign workers or temporary or unskilled labour to carry out functions which are not immediately visible because the work is undertaken at nighttime or in remote locations, such as security or cleaning • Use of child labour in hazardous conditions, such as underground, with dangerous machinery or tools, in unhealthy environments (including where they are exposed to physical or sexual abuse), or for long hours • Recruitment strategies by suppliers, their agents or labour hire agencies target specific individuals and groups from marginalised or disadvantaged communities. • The sector involves direct engagement with children, including through orphanage tourism and other forms of 'voluntourism' (including through companies' social investment and corporate social responsibility programs).
Product and Services Risks Certain products and services may have high modern slavery risks because of the way they are produced, provided, or used.	• Cost requirements or delivery timeframes might require suppliers to engage in excessive working hours, make cost savings on labour hire or rapidly increase workforce size. • The development of the product or delivery of the services has been reported as involving labour exploitation by international organisations or NGOs. • Children are often used in the development of the product or delivery of the service, such as carpet weaving. • The product or components of the product are made in countries where there is a high risk of labour exploitation reported by international organisations or NGOs. • The services are provided in countries where there is a high risk of labour exploitation reported by international organisations or NGOs. • The product is made from materials or using services reported to involve a high risk of labour exploitation by international organisations or NGOs.

Type of Risk	Indicators of Modern Slavery
Geographic Risks* Some countries may have higher risks of modern slavery due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty.	• The country has not ratified international conventions relevant to modern slavery • The country is reported to have a high prevalence of modern slavery or labour rights violations and/or child labour by international organisations or NGOs. • The country has inadequate protections for workers, including no or weak capacity to effectively monitor workplace standards and enforce compliance with national standards. • Law enforcement agencies are reported to be hostile to workers in at risk industries. • The country forces parts of the population to work for development purposes, for example to assist in construction or agriculture. • The country is reported to have weak rule of law by international organisations or NGOs, including due to corruption, conflict and/or political instability. • The country has a high prevalence of people who are vulnerable to exploitation because they are impoverished, displaced or subject to severe discrimination
Entity Risks Some entities may have particular modern slavery risks because they have poor governance structures, a record of treating workers poorly, or a track record of human rights violations.	• Entity has previously been reported as noncompliant with human rights or labour standards, including by media or NGO sources. • Entity's procurement and sourcing processes appear poorly managed or inefficient. • Entity has complex or opaque supply chains. • Workers appear to have little information about workplace entitlements and protections and there is a general lack of information about workplace standards. • Audit results for the entity appear unreliable or conflict with other sources of information about the supplier, such as NGO reports. • Staff recruitment costs by labour hire companies or recruiters are not covered by the company, meaning that recruitment expenses such as travel may be improperly imposed on workers. • Entity provides residential care for children overseas.

*City have referred to the www.globalsslaveryindex.org to identify countries that are likely to have an inherent high risk of modern slavery from a supply chain perspective.



Risk profile

A summary of City's modern slavery risk profile is provided below.

Inherent Risk Contributing Factors/Existing Controls		Conclusion
City Team Members (Employees) – Office-Based Roles		
• All City team members are based in Australia and subject to Australian workplace/employment laws • Australia has a low Global Slavery Index Score • Majority of team members located in capital cities & professional office environments • Team members are educated and know their rights • City office-based operations do not inherently give rise to modern slavery conditions • Hybrid working arrangements available for office-based team members • City has mature policies, procedures, systems and controls for HR & OH&S (HSE) • Modern awards and employment contracts • Wages and benefits banding performed by independent party • City payroll audits • Team member satisfaction metrics and consultation practices • Whistleblower policy and independent reporting line		City consider the risk of modern slavery practices to our team members to be low
City Team Members (Employees) – Field Based Roles		
• All City team members are based in Australia and subject to Australian workplace/employment laws • Australia has a low Global Slavery Index Score • Some team members working in remote locations • Trade team members are educated and know their rights • Some field operations (e.g. cleaning industry) inherently give rise to risk of under payment • Some field team members may have migrated from countries with a high Global Slavery Index Score and may be prone to accept substandard working conditions • Field based employees are covered by an Enterprise Agreement that must be better off overall than the Modern Award • City partner with customers who have professional and safety-controlled premises/inductions • City has mature policies, procedures, systems and controls for HR & OH&S (HSE) • Team member satisfaction metrics, regular toolbox meetings and consultation practices • HSE field audits (sampling approach) • Job time logging and rostering systems • City payroll audits • Whistleblower policy and independent reporting line		City consider the risk of modern slavery practices to our team members to be low



Inherent Risk Contributing Factors/Existing Controls		Conclusion
Sub-contractor and Labour Hire Workforce		
• All subcontractor and labour hire workers are based in Australia and subject to Australian workplace & employment laws • Australia has a low Global Slavery Index Score • Some work in remote locations • Some field operations (e.g. cleaning, security industry) have an inherent risk of under payment • Some subcontractors' workers may have migrated from countries with a high Global Slavery Index Score and may be prone to accept substandard working conditions • Some subcontractors' workers may not be fluent in English and may not understand their rights or employment conditions • City partner with customers who have professional and safety-controlled premises/inductions • City procurement and subcontractor accreditation policies, procedures and systems, including check of subcontractor labour hire licences. • HSE field audits (sampling approach) • Whistleblower policy and reporting • Monthly / quarterly subcontractor management meetings held at National / State levels with key Subcontractors • City ethical sourcing policy and questionnaire systems • Subcontractor ethical sourcing audit program for high-risk subcontractor categories (e.g. cleaning, security) • After hours Contact Centre and Accounts Payable team members based in City's Malaysian office, subject to City's HR Policies, systems and management oversight • City partner with a limited number of subcontractors in high-risk industries to establish longstanding relationships with clear oversight of employment practices	City consider the risk of modern slavery practices to our subcontractor and labour hire workers who only work in Australia to be low. Inherent risk of breach of compliance with industry awards and other employment obligations for some industries (e.g. cleaning, security etc.) may be high, an Ethical Sourcing compliance program exists as a control to identify and remediate any identified non-compliances, therefore reduces the residual risk.	
Equipment, Parts & Materials, and other Services Suppliers		
• Majority of suppliers (tier 1) based in Australia (ABN/ACN registered entities). • Australia has a low Global Slavery Index Score – Many high spend equipment, parts & materials suppliers will be subject to the Modern Slavery Act mandatory reporting requirements – Some of City's suppliers (such as equipment, parts and material suppliers) may carry a risk of modern slavery practices through their international supply chains (if they source product or materials from countries that have an inherently high likelihood of modern slavery prevalence) – City ethical sourcing policy and questionnaire systems with a corresponding risk assessment – Supply agreements that reference ethical sourcing policy requirements – Sedex (Supplier Ethical Data Exchange) ethical sourcing audit program for some equipment suppliers based in high-risk countries	Although City consider the risk of modern slavery practices to our supplier workers based in Australia to be low, City will continue to work with its key equipment, parts and materials suppliers, in accordance with our Ethical Sourcing Policy, to further enhance our understanding of suppliers' international supply chains, operations, risk profiles and modern slavery risk mitigation strategies.	



4. Risk Mitigation, Due Diligence & Remediation Processes

In accordance with our Risk Management Framework, the City Modern Slavery Working Group have continued to assess the effectiveness of existing risk controls and identify additional risk mitigation actions within a Modern Slavery Risk Register. An overview of our risk mitigation strategy (including due diligence and remediation processes) for the current reporting period and beyond is provided below.

Risk Mitigation/Control	Actions/Status Current Reporting Period	Planned Actions Next Reporting Period & Beyond
City Risk Management Framework & Risk Register Continue to assess the risks of modern slavery across City's operations and supply chain and document/monitor within a Modern Slavery Risk Register.	City Risk Management Framework applied to the context of modern slavery for City's Operations & Supply Chain. A designated Modern Slavery Risk Register has been developed and maintained.	Continue to monitor modern slavery risks, record and assess annually to determine additional mitigation actions. City will continue to work with its key customers and suppliers, in accordance with our Ethical Sourcing Policy & Questionnaire, to further enhance our understanding of suppliers' international supply chains, risk profiles and modern slavery risk mitigation strategies.
City Modern Slavery Working Group The City Modern Slavery Working group is made of members of the City Senior Leadership Team, with the charter of: - Co-ordinating annual modern slavery risk assessments of City's operations and supply chain - Determining additional risk controls/actions to further mitigate modern slavery risks and improve performance - Oversee the delivery of modern slavery training and awareness initiatives - Oversee preparation, approval and publishing of City's Annual Modern Slavery Statement in accordance with requirements specified with the Modern Slavery Act (Cth) 2018 - Monitor changes to relevant Modern Slavery legislation - Review reported modern slavery breaches and coordinate required actions - Report modern slavery risk and compliance status to the Board	Modern Slavery Working Group has continued to meet on a periodic basis to identify and assess modern slavery risks and oversee the implementation of controls.	Continue to meet on a periodic basis to ensure the City Modern Slavery Working Group Charter is effectively implemented and outcomes are reported to the City Board.

Risk Mitigation/Control	Actions/Status Current Reporting Period	Planned Actions Next Reporting Period & Beyond
City Board Reporting Modern slavery reporting included in Board packs as ongoing board meeting agenda items	Included as a standard board reporting agenda item.	Continue to report on modern slavery risks and compliance status to the Board.
City Modern Slavery Policy Confirm City's commitment to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our operations and supply chains	Policy existing.	Continue to communicate and implement the requirements of the City Modern Slavery Policy. Review adequacy of the policy on an annual basis.
City Modern Slavery Act Compliance Framework Process Describes how City will ensure compliance to the Modern Slavery Act 2018 (Ctn), City Ethical Sourcing Policy and City Modern Slavery Policy	Process existing.	Continue to implement the requirements of the City Modern Slavery Act Compliance Framework Process. Review adequacy of the process on an annual basis. Conduct an annual internal desktop assurance review to ensure requirements of the process are effectively implemented within City.
City Ethical Sourcing Policy & Questionnaires Describes City's expectation of suppliers in relation to the ethical supply of goods and services Ethical Sourcing questionnaire issued to suppliers/subcontractors (based on spend) every two years.	Policy existing. Ethical Sourcing questionnaire completed for approximately 40 key suppliers/ subcontractors. Ethical Sourcing questionnaire e-form/database developed.	Continue to communicate and implement the requirements of the City Ethical Sourcing Policy with suppliers. Review adequacy of the policy on an annual basis. Take necessary remedial action if high modern slavery risks are detected in supply chains via Ethical Sourcing Questionnaire responses.
City Code of Conduct Describes the high-level standards of integrity and ethical behaviour required by all City team members, including prevention of fraud and corruption	Code of Conduct existing.	Continue to communicate and implement the requirements of the City Code of Conduct with team members. Review adequacy of the policy on an annual basis.



Risk Mitigation/Control	Actions/Status Current Reporting Period	Planned Actions Next Reporting Period & Beyond
City Whistleblower Policy Describes City's policy and processes in relation to any team member, partner team member, member of the public, supplier worker and/or contractor worker being able to report confidentiality (without fear of reprisal) any grievance where it is believed City's policies or Code of Conduct have been breached.	Policy existing with an independent and anonymous Whistleblower reporting and investigation service (Stoptime) established.	Continue to regularly communicate City's Whistleblower Policy and grievance reporting processes to City team members, partners, sub-contractors, suppliers and members of the public. Continue to take remedial action when confidential whistleblower grievances are received via reporting mechanisms. Review adequacy of the policy on an annual basis.
Subcontractor Accreditation Processes and Systems Formal accreditation processes (including ethical sourcing questionnaire for main suppliers) and systems used to approve new subcontractors and monitor compliance status	Continue to accredit subcontractors utilising City's revised screening questions and requirements that includes modern slavery and employment obligations.	Ensure subcontractors continue to complete the accreditation process upon initial onboarding and bi-yearly renewals. Continue to review adequacy of subcontractors that may not meet minimum modern slavery or employment requirements as per accreditation questionnaires. Additional background checks to be conducted for subcontractors from high-risk industries. Utilise Subcontractor accreditation platform (Rapid Global) ESG Category Flags provided by Givvable for any Modern Slavery risks, investigate as appropriate and take remedial action where necessary.
Supplier Approval Process Formal process used to approve new suppliers	Existing process and Supplier Approval Form with Modern Slavery risk criteria.	Continue to use the supplier approval form for new supplier applications to ensure Modern Slavery aspects are adequately assessed.
Supply Agreements Formal contracts in place with key suppliers that specify City's standard terms and conditions	Existing supply agreement templates in place that specify Modern Slavery compliance is a stated term and condition of supply.	Continue to ensure all new (or renewed) suppliers and subcontractors are onboarded using the current Supply Agreement template and/or Standard Terms & Conditions.
Subcontractor Spot Check Audits Field based audit program that focuses on health and safety risks applicable to work being performed by subcontractor workers in the field	Existing Subcontractor Spot Check audit program and checklist expanded to include employment obligations question.	Take remedial action if modern slavery risks are detected during field spot check audits.

Risk Mitigation/Control	Actions/Status Current Reporting Period	Planned Actions Next Reporting Period & Beyond
Training & Awareness	Delivered initial modern slavery training to City Executive, Senior Leadership, and Procurement teams City and/or Partner whistleblower reporting lines communicated to cleaning workforce via hardcopy posters at Partner work sites where practicable. Refresher awareness campaigns for team members through Team Communication channels	Continue to conduct refresher training and/or awareness campaigns for team members. Prepare and continue to periodically deliver Modern Slavery related information shares for subcontractor workers.
Remediation Processes	Defined in Modern Slavery Act Compliance Framework Process.	Continue to maintain a confidential Modern Slavery remediation log to be monitored and actioned by the City Modern Slavery Working Group. City may develop a remediation plan or decide to not utilise the services of Suppliers that are not willing to share required information or are unable to demonstrate that they have a suitable modern slavery risk management framework in place.
Subcontractor Employment Obligations Assurance Framework	Existing framework includes: • The classification of high-risk subcontractor categories (taking into consideration inherent industry risk of under payment) • Risk assessments of subcontractors from high-risk categories identified through completed Ethical Sourcing Questionnaires • Development and delivery of a subcontractor employment obligations audit program	Continue to implement the Subcontractor Employment Obligations Assurance Framework, including employment obligation audits of high-risk category subcontractors, and take remedial action if modern slavery risks/issues are detected during spot checks/audits.
Supplier Ethical Trade Audits	Continue to conduct social audits of selected high-risk overseas suppliers of equipment using the Sedex Members Ethical Trade Audit (SMEITA) format. The audits enable City and its customers to assess the manufacturing sites of key suppliers to understand working conditions, and to therefore help protect workers from unsafe conditions, overwork, discrimination, underpayment, and/or forced labour.	Continue to implement the key supplier social audit plan utilising the Sedex Members Ethical Trade Audit (SMEITA) format. Work with our customers (partners) and suppliers to ensure remedial action on audit findings is taken as required.

5. Assessing the effectiveness of our actions

City will continue to assess the effectiveness of our actions taken to address modern slavery risks. The City Modern Slavery Working Group will lead all aspects of assessing effectiveness and will report regularly to the City Executive Leadership Team and Board.

How City will continue to assess the effectiveness of our actions is summarised below:

Assessment Description	Method
City Modern Slavery working group	Meet on a periodic basis to assess the overall effectiveness of the Modern Slavery Act Compliance Framework and associated policies, processes and risk controls.
Modern Slavery risk register reviews	Conduct an annual Modern Slavery Risk Register review to: • Adjust risk context (based on available information) • Review new or changed risks and assess each • Review status of planned or existing mitigation actions and effectiveness.
Internal review of Modern Slavery Compliance Framework	Conduct an internal assurance review of the Modern Slavery Compliance Framework (and associated policies, processes and risk controls) and report findings directly to the Board. Log and take corrective action for any non-compliances or opportunities for improvement that may be identified.
Annual review of policies and processes	Conduct an annual review of all Modern Slavery related policies and processes. Update and recommunicate policies or processes that may have been revised (as required).
Whistleblower grievances	Conduct a confidential periodic review of the effectiveness of actions taken to address logged whistleblower grievances (as related to modern slavery concerns – if applicable).
Supplier reviews	Conduct periodic supplier and subcontractor reviews / audits and action instances of noncompliance / improvement.
Internal & external reporting	The City Modern Slavery Working Group to provide regular periodic modern slavery compliance framework and risk status updates to the City Executive Leadership Team and Board. City to report directly to key customer (partner) representatives on employment obligation matters related to subcontractor and supplier workers.

6. Consultation with Controlled Entities

City Holdings (Aus) Pty Ltd and its controlled entities are treated as one entity (City) from a Board, management structure, operational, resourcing and corporate governance perspective. Therefore, City does not need to consult separately with its controlled entities in the development of this Modern Slavery Statement.



7. Conclusion

City is committed to further strengthening our risk controls to ensure continued mitigation of modern slavery risks in our operations and supply chain.

An overview of City's progress to date (and planned future initiatives) is outlined below in City's Modern Slavery compliance journey.

City's modern slavery compliance journey (key activities)

FY 2021-2024 (1 Jan 2021 to 31 Dec 2024)	FY 2025 (1 Jan to 31 Dec 2025)	FY 2026 (1 Jan 2026 & Beyond) This report
- City's modern slavery statements continue to evolve - Modern slavery working group continued to review modern slavery risk profile and ensure implementation of existing controls - Delivered modern slavery training to City procurement, executive and senior leadership teams - Revised City's ethical sourcing policy and supplier/ethical sourcing questionnaires - Continued to work closely with key partner (customer) representatives to refine and further implement sub-contractor and supplier employment obligations/ social audit programs and take remedial action where required. Including onboarding of additional internal resources to perform audits. - Implementation of an independent and anonymous whistle-blower reporting and investigation service (Stopline).	- Continue to implement and monitor the integrity of existing modern slavery risk controls - Continue to issue Ethical Sourcing questionnaires to high-risk category sub-contractors and key suppliers to assess risk of their operations and supply chains. - Continue to deliver modern slavery refresher training and awareness programs - Continue to work closely with key partner (customer) representatives to perform risk assessments and audits/spot checks of sub-contractors and suppliers working in inherently high-risk industries or geographical locations. - Supplier audits to continue to utilise the Sedex Members Ethical Trade Audit (SMETA) format - Work with subcontractors to improve compliance standards in high-risk sectors and industries, identify root causes of issues highlighted in audits, support best practice implementation	- Continue to implement and monitor the integrity of existing modern slavery risk controls - Continue to issue Ethical Sourcing questionnaires to high-risk category sub-contractors and key suppliers to assess risk of their operations and supply chains. - Continue to develop and deliver modern slavery internal refresher training and awareness programs, and expand to selective high risk industry subcontractors - Continue to work closely with key partner (customer) representatives to perform risk assessments and audits/spot checks of sub-contractors and suppliers working in inherently high-risk industries or geographical locations. - Supplier audits to continue to utilise the Sedex Members Ethical Trade Audit (SMETA) format - Conduct a Modern Slavery Framework benchmarking review. - Utilise Rapid Global ESG information in subcontractor risk assessment

8. Compliance to the Mandatory Reporting Criteria

Modern Slavery Act 2018 (Cth) Mandatory Reporting Criteria	Reference in this statement
1. Identify the reporting entity	Section 1 (Page 4)
2. Describe the reporting entity's structure, operations, and supply chains	Section 1 & 2 (Pages 4 to 8)
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Section 3 (Pages 9 to 13)
4. Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address risks, including due diligence and remediation processes	Section 4 & 7 (Pages 14 to 17 and 20)
5. Describe how the reporting entity assesses the effectiveness of such actions	Section 5 (Page 18)
6. Describe the process of consultation with any entities the reporting entity owns or controls; and, for a reporting entity covered by a joint statement, the entity giving the statement	Section 6 (Page 19)
7. Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Through-out Document, Introduction & Conclusion



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