

AVID PROPERTY GROUP'S MODERN SLAVERY STATEMENT

For the Reporting Period: 1 July 2023 – 30 June 2024

This statement is made pursuant to the **Australian Modern Slavery Act 2018 (Cth)**. It outlines the steps taken by AVID Property Group Pty Ltd during the reporting period to identify, assess, and address the risks of modern slavery in our operations and supply chains.

INTRODUCTION

AVID Property Group Pty Ltd is committed to upholding the highest standards of ethical conduct in all aspects of our operations and supply chains. We recognise that modern slavery is a serious global issue and are committed to working with our stakeholders to identify and mitigate any risks of modern slavery within our sphere of influence.

OUR COMMITMENT TO THE COMMUNITY

AVID Property Group (AVID) is dedicated to creating thriving communities in Australia's key growth markets with a strong commitment to product innovation, sustainability, affordability and lifestyle excellence. Upholding human rights and promoting ethical labour practices are integral to our core values of authenticity and our community-mindedness.

Throughout 2024, AVID has continued to strengthen its approach to identifying and mitigating modern slavery within our supply chain. We have achieved this by implementing ongoing robust risk assessment processes, conducting supplier due diligence and integrating modern slavery compliance measures into our policies and operational frameworks.

Our partnership with the Property Council of Australia (PCA) and consultancy Informed 365 Pty Ltd remains a cornerstone of our strategy. We continue to leverage the PCA online supplier portal to facilitate effective review and reporting processes across the property and construction industry.

AVID PROPERTY GROUP AND ITS STRUCTURE, OPERATIONS AND SUPPLY CHAINS

The reporting entity is AVID Property Group Holdings Pty Ltd (ACN 608 054 833) and its related entities which operate and manage the AVID Property Group of companies in Australia.

Since 2016 AVID has been supported by Proprium Capital Partners, a global private equity firm. This partnership has been pivotal in driving AVID's strategic growth and investment success.

As a leading and diversified residential community developer, AVID currently oversees a portfolio of 45 projects located in prime near-city and high-demand regional areas across the Eastern seaboard of Australia. Over the past 17 years, the Group has delivered 75,000 homes to market, generating a revenue pipeline of \$4.2 billion. AVID's extensive holdings include broadacre land developments, master-planned communities, completed house and land packages and apartments and more recently, land lease communities.

AVID is committed to maintaining the highest standards of corporate governance and ethical conduct. The organisation is guided by a Board of Directors, Executive Committee and Management Team comprised of some of Australia's most accomplished and forward-thinking leaders in property development and asset management. Together, they play a pivotal role in overseeing AVID's governance framework and ensuring strong organisational performance.

The Board and its Committees maintain rigorous and consistent oversight of the organisation's operational and financial performance. A commitment to ethical conduct and compliance is deeply embedded in the company's governance framework, supported by a comprehensive suite of policies that are regularly reviewed and updated by the Board or its Committees to ensure alignment with evolving corporate governance standards and regulatory requirements.

Graphic 1: AVID's Corporate Governance Structure



Our key policies relevant to modern slavery are:-

- Anti-Slavery Policy;
- Anti-Bribery and Anti-Corruption Policy
- Whistleblower Policy
- Suspicious Matters Reporting Policy
- Risk Management Policy and Framework
- Code of Conduct Policy
- Grievance Handling Policy

WHAT ARE THE RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS?

We acknowledge that modern slavery is a complex global challenge, particularly in the context of business operations. Within the property and construction industry, risks stem from the reliance on agency and subcontracted labour, the employment of a substantial migrant workforce, the pressures of strict cost and time constraints, and the lack of visibility over multi-tiered supply chains.

Although the immediate disruptions caused by COVID-19 have eased, the property and construction industry continues to face persistent challenges in 2024. Long term effects on supply chains, including material shortages, labour constraints and price volatility, remain persistent challenges affecting the sector.

AVID's risk management framework follows the internationally recognised ISO 31000 Risk Management – Principles and Guidelines, ensuring a structured and effective approach to identifying and addressing risks. It is further aligned with Principle 7 of the Australian Securities Exchange (ASX) Corporate Governance Principles, which emphasises the need for robust processes to identify, assess and mitigate risks.

Throughout the 2024 reporting period, AVID maintained a strong focus on due diligence screening measures for all new suppliers, reflecting its ongoing commitment to ethical and transparent practices. To further strengthen compliance, key modern slavery related questions were integrated into AVID's onboarding software, LinkSafe, providing a streamlined and effective framework for supplier evaluation.

Suppliers were actively encouraged to complete the annual questionnaire on the PCA online supplier portal, with follow-up actions undertaken to ensure full participation and accountability. Additionally, AVID's Procurement Guidelines were updated to include specific references to the Company's Modern Slavery Policy and associated due diligence processes, reinforcing a consistent commitment to ethical standards.

The suppliers evaluated during the reporting period present a low risk of modern slavery within AVID's supply chain and operations.

RESIDENTIAL PROPERTY DEVELOPMENT

The delivery of residential property developments is outsourced to highly skilled and reputable construction partners, recognised as industry leaders for their expertise and reliability. Our primary focus in this area is on the development of master planned communities, rather than individual built environments.

Our assessment for the reporting period indicates that the modern slavery risk in this area of our business remains low. However, we will continue to monitor and consult with our supply chain on these issues to ensure this evaluation is accurate and reflective of any emerging risks.

As head contractors, we engage subcontractors through a competitive selection process and formalise these engagements with clear agreements. The nature of our residential property development operations are such that our subcontractors predominantly source their services and materials locally within Australia. We acknowledge that the reliance on labour hire companies within our supply chain represents a notable area of risk. As outlined elsewhere in this report, AVID actively manages and mitigates this risk through targeted strategies and oversight.

HOUSING CONSTRUCTION

Through our Villaworld Homes housing business, we construct residential homes across a range of developments along Australia's eastern seaboard. Our operations rely on a diverse range of trades, including many smaller businesses. While verifying the modern slavery practices of smaller suppliers can be challenging, we remain proactive in addressing these issues. We collaborate with the Housing Industry Association of Australia to educate the broader industry on the significance of modern slavery prevention. Additionally, we engage directly with our suppliers through targeted email campaigns to raise awareness and promote ethical practices within this segment of our supply chain, which is largely comprised of small businesses. Whenever possible, we prioritise procuring Australian made and Australian owned building products and sourcing local trades and manufacturers near our development sites to support local economies and enhance supply chain transparency.

Our current assessment places the risk of modern slavery within our housing construction business as medium-low. This cautious evaluation reflects the wide variety of materials sourced from numerous suppliers and the reliance on a substantial cohort of local small businesses for labour and services. We remain committed to monitoring and addressing these risks as part of our ongoing efforts to uphold ethical and responsible practices.

CORPORATE OPERATIONS

We are committed to sourcing goods and services from a diverse network of Australian suppliers to support our corporate operations. This includes areas such as promotional goods, information and communication technology, professional services and financial services.

Based on our ongoing evaluations, the risk of modern slavery within this aspect of our operations is currently assessed as low.

WHAT ACTIONS HAVE WE TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS?

AVID employs a comprehensive range of controls and due diligence measures to manage modern slavery risks within our supply chain. During the 2024 reporting period, AVID took several targeted actions to strengthen its approach. These included holding regular meetings of the Modern Slavery Work Group, maintaining active communication with suppliers and requesting updated responses to the Modern Slavery questionnaire via the Property Council of Australia (PCA) online supplier portal.

Additionally, we conducted a detailed data analysis of our top suppliers by spend, confirming that all were Australian based companies. However, we recognise that some indirect goods and services may originate from regions more vulnerable to modern slavery risks. To address this, we have implemented measures requiring direct suppliers to notify us of any potential or actual breaches within their own supply chains.

Collaboration has been a key focus, with AVID working with the PCA and Informed 365 Modern Slavery Working Group to exchange insights and improve capabilities across the online supplier portal. To further raise awareness, we delivered targeted communications to suppliers, providing education on modern slavery issues. These efforts reflect our ongoing commitment to ethical and responsible practices across all levels of our supply chain.

Graphic 2: Modern Slavery Compliance Cycle



HOW DO WE MANAGE AND MITIGATE MODERN SLAVERY RISK?

The Modern Slavery Working Group has remained dedicated to managing and mitigating Modern Slavery risk through several key initiatives. These include actively engaging with suppliers on modern slavery issues, both through the PCA portal and direct communication, as well as collaborating with consultants to review supplier responses to the PCA questionnaire and identify necessary actions. The group has also ensured that senior management sets a strong ethical tone for the business, raising awareness among team members and business partners about AVID's commitment to addressing modern

slavery. Additionally, binding undertakings regarding modern slavery compliance have been incorporated into AVID's standard supplier agreements to reinforce accountability and ethical practices.

HOW DO WE ASSESS THE EFFECTIVENESS OF ACTIONS BEING TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS?

AVID's Modern Slavery Working Group is the designated committee responsible for ensuring compliance with modern slavery obligations. The group focuses on several key areas to assess and mitigate risks effectively. First, it evaluates the completion rates of the PCA questionnaire by suppliers, noting that supplier responsiveness to the modern slavery questionnaire improved in the 2024 reporting period, exceeding the industry average. Second, the working group leverages insights from the PCA portal to identify suppliers that may pose a higher risk, ensuring their responses are subjected to enhanced scrutiny. Finally, the group monitors AVID's progress in implementing the actions and initiatives agreed upon to address modern slavery risks, ensuring continuous improvement and accountability.

HOW DO WE ENGAGE WITH OUR SUPPLY CHAIN?

AVID actively collaborates with the PCA and numerous leading property and construction companies, leveraging the PCA online supplier portal to evaluate suppliers in line with modern slavery legislation requirements. The online supplier portal simplifies the reporting process, enabling suppliers to efficiently share relevant information with property companies while also serving as a valuable tool for industry-wide training and raising awareness about modern slavery issues.

To further support this initiative, AVID encourages its suppliers to enhance their understanding of modern slavery issues by accessing the various educational resources available through the PCA online supplier portal.

Looking ahead to 2025, AVID's priorities include strengthening relationships with both existing and new suppliers, increasing awareness of modern slavery issues in our supplier base, encouraging greater completion rates of the annual modern slavery questionnaire, and maintaining rigorous due diligence screening measures for new suppliers. These efforts reflect our continued commitment to ethical supply chain management and compliance with modern slavery legislation.

HOW DO WE ENGAGE WITH THE ENTITIES WE OWN AND CONTROL?

The operations and supply chains of AVID are overseen and managed by the AVID Property Group Board. The CEO and Executive Management team are accountable to the Board for the day-to-day management of all issues in relation to the operations and supply chains of the business.

Modern slavery compliance is an integral responsibility of the Risk Audit Committee. This committee is tasked with monitoring the Group's compliance with applicable laws, regulations and the company's code of conduct, ensuring ethical and compliant practices are maintained across all areas of the business.

The entities covered by this statement were consulted through the Modern Slavery Working Group, and the directors of the subsidiary companies have reviewed and approved this statement as part of the consultation process.

This Statement was approved by the Board of AVID Property Group Holdings Pty Ltd (ACN 608 054 833) and its related entities on 11 December 2024.



Cameron Holt
Director and CEO
AVID Property Group Holdings Pty Ltd