



Modern Slavery Statement

Reporting Period: 1 January 2022 to 31 December 2022

Introduction

This statement is made pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) for the period from 1 January 2022 to 31 December 2022 (Reporting Period) by Prudential Investment Company of Australia Pty Ltd ACN 004 266 817 (PICA) on behalf of itself and its wholly owned subsidiaries (collectively the PICA Group).

PICA Group is committed to upholding human rights and does not tolerate practices that constitute modern slavery. PICA Group asks its clients, business partners, and workforce to raise any issues or concerns regarding potential human rights infringement or modern slavery practice.

Our structure, operations, and supply chains

PICA Group, which incorporates all of PICA's subsidiaries and brands, has over 50 years' experience in providing property management services to commonly owned properties. While none of our subsidiaries individually meet the reporting threshold, PICA is issuing this statement for the group.

PICA Group's core business is focused on strata management and administration services. With more than 11,000 buildings equating close to 200,000 lots under our management, we strive to enhance Australia's community living. To this end, we also provide development advisory services, building maintenance and repair, debt recovery and legal services.

Details about us, our services, and branches can be found on www.picagroup.com.au. Our key supplier chain categories which represent PICA Group's major expense categories are:



Professional services



Information Technology (hardware and software)



Human resources



Contractor services



Premises

PICA Group's goods and services are procured locally and provided locally, with very few exceptions. In addition to procuring supplies for its operations, PICA Group facilitates the procurement of goods and services by its clients. Through a basic engagement with vendors who are boarded on the PICA Group portal, or, in the case of specialist professional or other services providers, included in a PICA Group panel, clients have easy access to a range of suppliers and service providers.

Identifying PICA Group modern slavery risks

PICA Group is continuing to assess its modern slavery risk, based on location, industry, and its operations. PICA Group continues to operate within Australia. Its core services are advisory and provided by professionals in a regulated industry.

We have categorised the potential for modern slavery risks associated with our business operations and/or supply chains into the following categories:

- Our people and workforce
- Our contractor service arrangements
- Our suppliers of suppliers

Risks may arise in the supply chain with PICA Group reassessing its risk during the Reporting Period with the acquisition of a repairs and maintenance business. While PICA Group operations remain local, PICA has identified a more direct link to potential modern slavery practices. Within PICA Group's direct and indirect supply chains, we recognise that sectors such as corporate cleaning and maintenance as well as the manufacture of building materials are sectors known to carry modern slavery risks.

Actions taken to assess and address our modern slavery risks

During the Reporting Period PICA Group continued to implement its key initiatives and actions to assess and address modern slavery risks.

Procurement and supplier due diligence

PICA Group conducts a review of any vendor or service provider it engages. The same standards are applied to the vendors that can be engaged by PICA Group clients and form part of PICA Group's database or panels.

PICA Group engages contractors both for itself and on behalf of its clients. During the initial review, contractors have to attest that they will be complying with PICA Group's Contractor Code of Conduct that requires lawful and ethical behaviour as minimum requirements. The Contractor Code of Conduct is then incorporated into the terms and conditions of every contract, quote, or work order issued to a contractor. In addition, PICA Group has a small group of third-party offshore relationships for accounting & administrative functions which PICA acknowledge and review via its procurement and service level management processes.

Corporate governance and policy review

PICA's Board and the PICA Group Audit, Risk & Remuneration Committee (PARRC) have the responsibility for establishing a framework for risk management for PICA Group. The PARRC meets quarterly and reviews financial and non-financial risks, including regulatory and compliance risks and matters.

PICA Group has various policies which actively reviews and promotes in PICA Group's responsible, proactive and risk awareness to its business operations which include but are not limited to the following:

- Code of Conduct Policy;
- Expenditure Approval Policy;
- Conflict of Interest Policy;
- Recruitment and Selection Policy;
- Respect and Dignity at Work Policy;
- Fraud Policy;
- Risk Management Policy;
- Supplier Security Policy;
- Customer Complaint Management Policy;
- Whistleblower Policy

PICA Group encourages and supports the reporting of any improper conduct encountered. Customers can provide feedback and raise any concerns via PICA's Customer Feedback Portal on its website. Both the Whistleblower Policy and the Customer Complaint Management Policy provide avenues for staff and third parties to notify and escalate any observed behaviour. The Whistleblower Policy details how any employee can report any known or suspected breach of our ethical standards, including a failure to comply with any legal obligation, unfair or unethical dealing with a customer, supplier or agent of the PICA Group, corrupt conduct, and human rights abuses. It guarantees that any issue can be raised in confidence and provides employees with internal and external disclosure avenues.

Employment terms and conditions

PICA Group currently employs approximately 800 employees in Australia. In relation to our recruitment and employment of our people, we promote respectful behaviour in the workplace supported by a reporting mechanism through our Respect and Dignity at Work Policy which is further supported by our mandatory e-learning training program. These deliberate and considered processes afford PICA Group the confidence that our employment processes minimise the risk of the prevalence of modern slavery practices forming part of our business operations. We routinely review our recruitment procedures. During the Reporting Period we completed a full review and updated our employment contract terms and conditions with the support and guidance of our external employment law services provider to ensure that these arrangements do not give rise to any breach of any of our legal obligations.

Measuring the effectiveness of our actions

PICA Group acknowledges and accepts that it is responsible for the continuous improvement of its policies and processes as well as actions taken to combat the potential risk of modern slavery practices within our business operations and supply chains.

Measuring our effectiveness during the Reporting Period has relied upon:

- strict adherence to third party due diligence processes; and
- the fact that no modern slavery incidents have been identified.

Our future priorities

PICA Group is determined to continue addressing and minimising modern slavery risk in its operations. In the next reporting period PICA Group will focus on refining its risk assessment and on reviewing its documentation for the boarding and contracting of any third party, to include more express and specific requirements and language regarding the risk of human rights infringements to address modern slavery risk.

Other relevant information

As mentioned in the Initial Reporting Period, our research indicated the prevalence of modern slavery practices in the cleaning services sector as being one which ranks as potentially a higher risk for the potential for modern slavery.

As PICA Group routinely procures cleaning contractor services on its own behalf or has cleaning contractors on its database for its clients' engagement, we are conscious and alert to the potential risks for modern slavery.

Encouragingly, during the Reporting Period there have been no incidents of modern slavery practices uncovered by or reported to PICA Group. Despite there being no incidents of modern slavery practices, PICA Group has, and will continue to apply special attention to the potential risk of modern slavery practices in the cleaning sector.

Conclusion, consultation and approvals

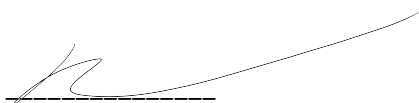
This modern slavery statement was revised in consultation with representatives from PICA Group's Audit & Risk, People & Culture, Legal and Procurement functions and was reviewed by the Company Secretary.

This modern slavery statement for PICA Group was approved by the board of the parent company entity Prudential Investment Company of Australia Pty Limited ACN 004 266 817 in their capacity as principal governing body of PICA on 14 June 2023.

For questions relating to this statement, please contact:

PICA Group
Company Secretary
companysecretarial@picagroup.com.au

This statement is signed by Robert Lehane in his role as Director of PICA and CEO PICA Group.



Robert Lehane