



VINTA MODERN SLAVERY STATEMENT

Reporting period: 1 July 2019 – 30 June 2020

Our Structure, Operations & Supply Chains

About us

This modern slavery statement (**Statement**) is made by Gregala Pty Ltd ABN 88 001 294 060, an Australian incorporated company, in accordance with the Modern Slavery Act 2018 for the reporting period 1 July 2019 to 30 June 2020. This Statement covers the operations of Gregala Pty Ltd which is a single reporting entity, and also addresses the operations of other entities in the group which it controls but which are not required to register a modern slavery statement individually (**Vinta**).

Our operations

During the reporting period, Vinta operated as a leading Australian private integrated property and hotels group operating principally in Australia. Our integrated structure includes capabilities covering the full spectrum of the property lifecycle including:

- capital transactions
- developments
- design and construction
- leasing
- marketing
- asset management
- property management
- funds management

Our Australian assets include major shopping precincts at Coolangatta in Queensland and Gungahlin in the ACT.

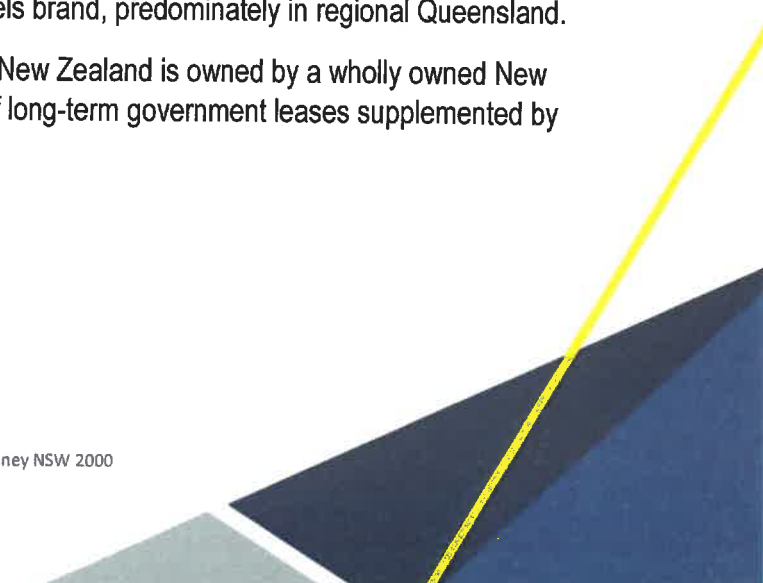
Vinta operates nine hotels under the Waymark Hotels brand, predominately in regional Queensland.

Internationally, a CBD office property in Wellington New Zealand is owned by a wholly owned New Zealand subsidiary. This property includes a mix of long-term government leases supplemented by additional blue chip corporate tenants.

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As at the end of the reporting period for this Statement, Vinta's staff consisted of over 420 employees. Employees are a mixture of permanent and casual staff.

Our supply chains

100% of Vinta's direct suppliers to our Australian operations are Australian businesses/entities, or the Australian-based operations of major multi-nationals. Vinta obtains goods and services from such suppliers in the following broad categories:

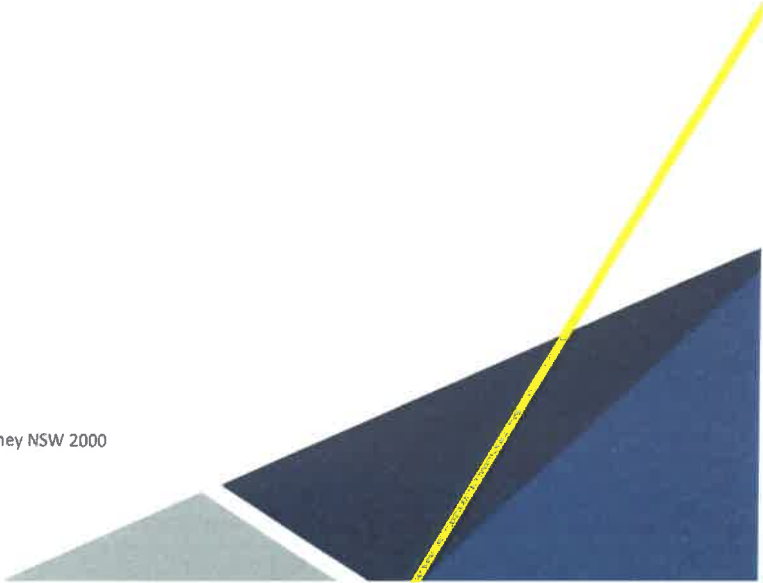
Category	Description
Corporate services	Professional advice services, IT support, catering, office and IT equipment and supplies.
Premises	Cleaning, waste management, security, facilities management, maintenance, and utilities.
Hospitality	Food and beverage supplies.
Retail	Retail products.
Design & Construction	Professional services, contracting services, building and construction equipment and supplies.

Vinta recognises that modern slavery risks may exist in our upstream supply chain involving other parties connected to our direct suppliers with which we do not have a direct contractual relationship.

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Modern Slavery Risk Management

Our risk management framework

A strong risk and compliance culture has been embedded within the business. Vinta is committed to ongoing and effective risk management and compliance across all aspects of the group's operations, including finance, service delivery, operations, projects, construction, development, legal and governance, reputation and brand, human resources, and work, health, safety & environment.

Our approach to assessing and addressing the risks of modern slavery is part of our broader risk management framework and is overseen by the Group Risk Management function. Vinta has assessed the risks that it may cause, contribute, or be directly linked to modern slavery practices as outlined below.

Risks of modern slavery in our operations

A large proportion of Vinta's operations are managed in-house, including our Development, Design & Construction, Asset Management, Property Management, Hospitality and Retail.

The majority of employees in the following operations are employed in skilled professional capacities:

- corporate services
- development, design and construction
- leasing and property management
- asset management
- funds management
- shopping centre precincts

The staff in our hospitality venues are employed on terms which exceed or equal the relevant Australian hospitality industry awards. Vinta also has an employee assistance program which is independent of Vinta management and provides a further level of support to any employees.

For the reporting period, and having regard to the nature of the work undertaken, services provided, Australian workplace laws, our robust hiring and people management procedures and our focus on risk and compliance, Vinta has assessed the risk of causing modern slavery in our operations as low,

Risks of modern slavery in our supply chains

The majority of the suppliers to Vinta's operations are Australian-based professional services firms, or multi-national entities with staff based in Australia. Professional services are also provided by New Zealand based suppliers to our New Zealand operations. For the reporting period, Vinta has assessed the risk of contributing to modern slavery in this context as low, having regard to the categories of supplier, the nature of the services/goods supplied and Australian and New Zealand workplace laws.





Vinta has identified that some of our supply chains may be more vulnerable to modern slavery risks including building and construction supplies and equipment, cleaning, security, waste management, IT equipment and sourcing of retail products. Again, the majority of our suppliers for these goods and services are Australian-based and have been allocated a low risk rating having regard to the nature of the goods and services supplied and Australian workplace laws.

It is acknowledged that the geographical location of some upstream parties involved in our supply chain may in some cases involve higher modern slavery risks. Our assessments of suppliers disclosed that some suppliers source materials and products from third parties incorporated and/or operating outside Australia and New Zealand. These more complex supply chains were assessed as having a higher risk of being connected to modern slavery factors, including:

- Unknown labour conditions in the country of origin.
- Upstream supplier operations which are not transparent to Vinta and may not achieve the standards we expect from our Australian and New Zealand suppliers.

Assessing and addressing risk

Due diligence

Through our governance process, executive management determined that the assessment of modern slavery risks in Vinta's operations and supply chains was required.

A due diligence process was undertaken with respect to the reporting period for this Statement including:

- Engagement with senior management to analyse Vinta's business operations and supply chains, including for subsidiaries.
- A consultation process undertaken by the Group Risk Management function.
- Categorisation of suppliers.
- Risk assessment of Vinta's operations and supply chains having regard to the following modern slavery factors: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

During the reporting period for this statement, Vinta operations in Australia and New Zealand were impacted by COVID – 19 pandemic public health orders and directions. Compliance with these directions, and our priority focus on the health and safety of staff and customers, affected operations in our shopping precincts and offices, and required the temporary closure of some of our hospitality venues. However, our supply chains for essential goods and services were assessed as remaining relatively stable.





We intend that, as part of our risk management framework, key aspects of our future modern slavery risk management program will include:

- Development of an engagement plan with direct suppliers to encourage them to conscientiously review and address issues in their own systems concerning the risks of modern slavery, thereby verifying our secondary and upstream supplies.
- Identifying potential training needs for senior management regarding risks of modern slavery in procurement of goods and services.

Remediation

In the due diligence conducted for the reporting period, no specific cases of actual or suspected modern slavery were reported. Vinta has a comprehensive Whistleblower Policy to support its commitment to ethical business operations.

Effectiveness of the Program

For the first reporting period, Vinta's primary objective was to analyse its operations and supply chains and develop a risk matrix to assess and address the risks of modern slavery. This analysis will form the basis for our ongoing modern slavery risk management program.

Our due diligence process has allowed us to identify the risks of modern slavery in our operations and supply chains. Our ongoing governance processes will include further steps to monitor the integrity of our assessments. This process has also highlighted the importance of modern slavery risks for senior management, particularly in procuring goods and services, and will assist to identify areas where further review and assessment may be needed.

Consultation

In the preparation of this Statement, Vinta has conducted a consultation process with each of its Divisions (including those operated by subsidiaries). This process involved communication to the senior management team about the process for consultation and development of this Statement, followed by an initial analysis of Vinta's operations and supply chains. The Group Risk Management function then reviewed the scope of supplier categories and engaged in direct risk analysis consultation with each Division.





Approval

This Statement was approved by the Board of Gregala Pty Ltd ABN 88 001 294 060
on 30 MARCH 2021.

Signature of Director

CHRISTOPHER J. WILSON

Name of Director (print)

30 MARCH 2021

Date

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