

A tall, modern hotel building with a grid of windows. The top part of the building is dark glass, while the lower part is a lighter, textured facade. The InterContinental logo and name are prominently displayed on the upper part of the building. A palm tree is visible in the foreground on the right side.

INTERCONTINENTAL

Modern Slavery Statement

FOR THE YEAR ENDED 31 DEC 2022



About this Statement

This is our third Modern Slavery Statement (Statement) prepared by Mulpha Australia Limited (Mulpha) in accordance with the mandatory criteria for modern slavery statements in section 16 of the Modern Slavery Act 2018 (Cth) (Act).

This statement has been prepared in consultation with Mulpha Australia Limited and its controlled entities (the Group)¹. Mulpha is a wholly owned subsidiary of Mulpha International Berhad, which is listed on the Malaysian stock exchange (BURSA exchange).

In preparation of the statement, we actively engaged and consulted with relevant business units and entities which form part of the Group throughout the year and more formally reported modern slavery risk, group-wide risk assessment processes, continuous improvement opportunities, action plans and the content of the modern slavery report to the executive led Group Risk Management Committee and the newly formed Sustainability Committee (from Q1 2023) which includes representatives from each Group business division and meets on a quarterly basis.

This statement was reviewed by the executive Sustainability Committee and the Mulpha Audit & Risk Management Committee, and was approved by the Mulpha Board on 29 May 2023. This statement was reviewed by an external lawyer and is for the period from 1 January 2022 to 31 December 2022.

Further information on our business and how we operate can be found on our website www.mulpha.com.au.

Acknowledgment of Country

We (Mulpha) acknowledge the Traditional Custodians of the lands where we work and live. We celebrate the diversity of Aboriginal peoples and their ongoing cultures and connections to the lands and waters of NSW.

We pay our respects to Elders past, present and emerging and acknowledge the Aboriginal and Torres Strait Islander people that contributed to the development of this resource.

We advise this resource may contain images, in photographs of historical content.

¹This statement is published by Mulpha Australia Limited (ABN: 44 002 888 039) and includes all controlled entities which Mulpha has control for accounting purposes during year ending 31 December 2022 (references to 'Group', 'we', 'us', and 'our' refer to Mulpha Australia Limited and its controlled entities).

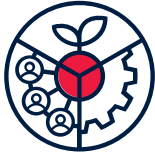
About this Statement

Mandatory Criteria	Reference Modern Slavery Statement	Page
Identify the reporting entity	<ul style="list-style-type: none"> – About this Statement – Appendix One - Entities that make up the Group 	<p>2</p> <p>22-23</p>
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).	<ul style="list-style-type: none"> – About this Statement 	2
Describe the reporting entity's structure, operations and supply chain	<ul style="list-style-type: none"> – About Mulpha: Our Structure, Operations and Supply Chains – Our Supply Chains and Modern Slavery Risks 	5-11
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	<ul style="list-style-type: none"> – Our Supply Chains and Modern Slavery Risks 	5-11
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	<ul style="list-style-type: none"> – Actions to Assess and Address Modern Slavery Risk – Due Diligence and Remediation Processes 	12-16
Describe how the reporting entity assesses the effectiveness of these actions	<ul style="list-style-type: none"> – Continuous Improvement and Effectiveness Assessment – Actions to Assess and Address Modern Slavery Risk 	19-20
Provide any other relevant information	<ul style="list-style-type: none"> – Case Study - InterContinental Hotels Group²:(IHG) Third Party Hotel Operator 	17-18

²References to the InterContinental Hotel Group or IHG are references to IHG Hotels Management (Australia) Pty Ltd (ABN: 33 008 413 367) and its affiliates, who have been engaged by a Mulpha Group entity to manage its IHG hotels assets.



FY 22 Highlights



Enhanced governance processes to ensure continued, growing and unified progress across the group through formation of a Sustainability Committee (in Q1 2023).



Review and refresh of modern slavery policy suite including supplier code of conduct, human rights policy, sustainability policy and heritage policy for inclusion on our re-freshed website www.mulpha.com.au



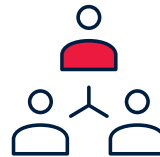
Active engagement with employees to encourage sustainability initiatives (including modern slavery) be included in their day-to-day decision making.



Completion of third supplier risk assessment to enhance our understanding of our supply chains.



Online modern slavery training available to all staff members through Mulpha's online training platform.



Continued collaboration with IHG to improve collective understanding of direct and indirect supply chains, governance, training and actions to address modern slavery arising from operations of IHG hotels under terms of each of the hotel management agreement.

About Mulpha: Our Structure, Operations and Supply Chain

Our Structure

The Group has over 30 years' experience in Australia as an innovative investment company and a strategic real estate debt and equity investor in hospitality and leisure, residential, commercial property development, retail and office sectors. The Group has a portfolio of luxury resorts, businesses and products.

The unique strength of the Group, is its deep knowledge and understanding of real estate assets and markets, coupled with its intensive management and experience in running operating assets and businesses. Its dedicated local team are paramount in building and sourcing these outstanding opportunities, whether it be in real estate or in business innovation.

The Group comprises Australian incorporated subsidiaries and trusts which own and operate a number of businesses, predominately focussed on real estate property development and investment, hospitality & hotel operations, and debt, fund and asset management. These wholly owned subsidiary companies engage employees and enter various contracts for supply of goods and services. In addition, Mulpha carries on some businesses through a partnership structure with third parties (an example being The Hotel School, a tertiary education provider, which is a partnership between Mulpha and Southern Cross University) and other businesses are owned and operated through a joint venture structure with third parties. The Group has entered into a hotel management agreement with a subsidiary of the InterContinental Hotels Group of companies in Australia or IHG Hotels Management (Australia) Pty Ltd (IHG) for each of its hotels; InterContinental Sydney, InterContinental Sanctuary Cove and InterContinental Hayman Island (IHG hotels).

The registered office of The Group's incorporated companies is in Sydney, Australia, while the place of business of each subsidiary company will depend on where the business operates on the east coast of Australia.

The entities that make up the Group are listed at Appendix One.



About Mulpha: Our Structure, Operations and Supply Chain

Our People

The Group³ employ 1,236 (FY21 940) people being 642 (51.94 %) females and 594 (48.05%) males. Our employee numbers increased in 2022 in line with our growing business model and following the re-opening of InterContinental Sydney after major refurbishment.

All employees are based in Australia across New South Wales 438 (FY21 294), Queensland 758 (FY21 612), Victoria 39 (FY21 33) and Western Australia 1 (FY211). 808 (FY21 673) of our employees are on permanent contracts and we employ 428 (FY21 267) casual workers.

The Group has a diverse range of employees across many job functions including asset management, property services, development, project management and event management who are supported by different business operations such as Risk Management, Health, Safety, Environment (HS&E), Legal, Compliance, Company Secretary, Governance, Finance, Marketing and Human Resources. The Group has a Chief Executive Officer, Mr Greg Shaw and an executive leadership team which operates Mulpha's business operations.

All our employees are paid in line with or above the award that covers their industry or occupation and in accordance with Australia's minimum wage entitlements. We have systems and processes in place to monitor award agreements and classifications at the time of hire and have recently (over the course of 2020 and 2022) undertaken a program of implementing a Group-wide software systems to capture time and attendance data. Independent external review of our award processes was completed prior to implementation of time and attendance systems.

We have processes in place to ensure that all team members hold working rights in Australia and comply with visa conditions (where required). We confirm right to work documents as part of our onboarding processes and use an independent checking system to check relevant employees' visas.



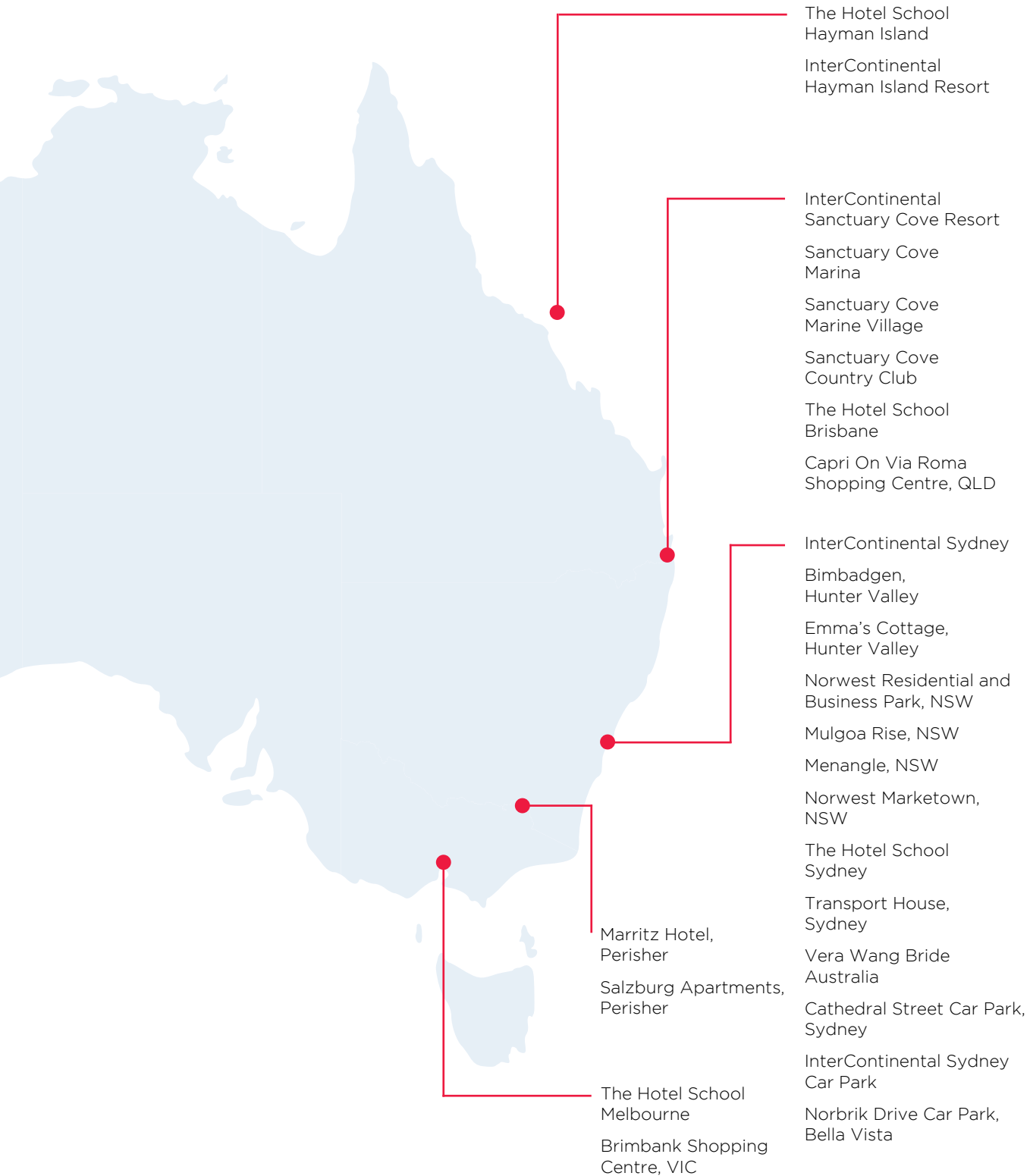
³The Group has several employing entities which include staff members at Mulpha head office, IHG hotels, Bimbadgen Estate, Enacon Parking, Mulpha Education, Norwest and Mulpha Funds Management.



About Mulpha: Our Structure, Operations and Supply Chain

Our Operations

The Group has operations in Queensland, New South Wales and Victoria.



About Mulpha: Our Structure, Operations and Supply Chain

Our Operations

At 31 December 2022 Mulpha had a diverse portfolio across the following key areas:



Hotels and Hospitality

Mulpha InterContinental Sydney
 InterContinental Sanctuary Cove Resort
 InterContinental Hayman Island Resort
 Bimbadgen, Hunter Valley
 Emma's Cottage, Hunter Valley
 Marritz Hotel, Perisher
 Salzburg Apartments, Perisher
 Various smaller hospitality venues, NSW and QLD



Commercial and Retail

Transport House, Sydney
 Sanctuary Cove Marina
 Sanctuary Cove Marina Village
 Sanctuary Cove Country Club
 Norwest Marketown, NSW
 Vera Wang Bride Australia
 Capri On Via Roma Shopping Centre, QLD
 Brimbank Shopping Centre, VIC
 (Operational control and 20% investment)



Events

A Day on the Green Bimbadgen
 Sanctuary Cove International Boat Show
 Sydney International Boat Show



Education

The Hotel School Sydney
 The Hotel School Brisbane
 The Hotel School Melbourne
 The Hotel School Hayman Island
 Online Courses



Real Estate Development

Norwest Residential and Business Park, NSW
 Mulgoa Rise, NSW
 Menangle, NSW
 Sanctuary Cove, QLD



Car Parking

Cathedral Street Car Park, Sydney
 InterContinental Sydney Car Park
 Norbrik Drive Car Park, Bella Vista



Funds and Debt Management

Mulpha Funds Management, Sydney and Shenzhen, China
 Mulpha Private Wealth

About Mulpha: Our Structure, Operations and Supply Chain

Our Brands

As an innovative investment company our brands represent our identity and are key to our portfolio growth and development.



About Mulpha: Our Supply Chains and Modern Slavery Risk

Mulpha recognises that our supply chain is complex and that there is potential to directly cause, contribute to or be directly linked (through another entity such as a principal contractor in the construction industry) to modern slavery.

As part of our ongoing commitment to operate responsibly, and to ensure we engage suppliers who are aligned with these commitments, Mulpha has certain expectations of its suppliers, which are documented within the Supplier Code of Conduct.

Modern Slavery Supply Chain Risk Map

Recognising that a comprehensive assessment of our supply chain is required as part of our ongoing supply chain assessment processes for the third year we completed a Group risk assessment to identify the areas within our corporate, operational and direct supply chain that are at greatest risk of modern slavery.

The risk assessments primary focus included:

- Identification of the products and industries within our supply chain.
- Analysis of spend by vendor and trade industry against social hotspot database information.
- Grouping of vendors by industries and spend utilising an internal rating based on high or low value and high or low risk industries or products to assist in our supplier due diligence and effectiveness assessment.
- Focuses on three primary areas of procurement of services and products relevant to property and construction: corporate procurement, operations and direct procurement⁴.

The table below provides an overview of our supply chain including critical risk areas and attributes associated with each of the identified critical risk areas:

Primary Area	Critical Risk Areas in our operations	Attributes
Corporate Procurement	Merchandising	Low skilled labour, labour dependency, labour intensive roles, temporary, night-time or contractor workers, lack of bargaining rights and/ or grievance mechanisms and work-related injuries.
	Office supplies	
	Travel	
Operations	Asset management: building services including security, cleaning, installation and maintenance	
Direct Procurement	Real estate development: construction	
	Hotel operations and hospitality	

⁴With reference to Property, Construction and Modern Slavery (2020) | Australian Human Rights Commission.

About Mulpha: Our Structure, Operations and Supply Chain

Supplier Analysis

The Group operates highly diverse business, and through our supplier analysis identified that our primary sources of modern slavery risk stem from:

- Real estate development which is largely managed through Principal Contractor relationships with third party construction companies, who procure the construction materials and building materials required for our developments.
- Asset management which includes high risk areas such as building services (security, cleaning, installation and maintenance).
- Hotel and hospitality operations which includes direct and indirect procurement of goods and services, such as food and beverages, operating supplies (such as linen, uniforms and bathroom amenities), building services including security, cleaning, installation and maintenance. Procurement occurs at the local hotel or venue level.

The vast majority of our suppliers are based in Australia. We are in the process of analysing the location and modern slavery risks associated with our international suppliers.

Within these businesses we directly procure from industries such as: labour hire, construction trades, cleaners, security and sourcing building materials, sourcing products and potentially, from overseas.

We identified development spend and more specifically building suppliers who are engaged as the principal under a Construction Management Agreement as our largest procurement costs. Each of these builders are required to report any instances of modern slavery under the terms of their agreement with Mulpha. Development spend is from Australian suppliers and distributors, however we are mindful that these direct suppliers have more complex, and often overseas, supply chain considerations. This extended supply chain has been identified as one of our highest risk areas for modern slavery.

We are committed to working with our suppliers and the extended supply chain to identify and address modern slavery and Our hospitality operations and hotel business spend is our second largest procurement cost and we recognise that there are health and safety risks and ethical procurement risks within these business operations. The direct and indirect supply chains of our hospitality and hotel businesses have been identified as a high-risk area for modern slavery. We are committed to collaboration with a subsidiary of the InterContinental Hotels Group of companies in Australia or IHG Hotels Management (Australia) Pty Ltd⁵:(IHG) and understanding ethical and responsible procurement risk within these businesses (further detail is available in the case study on page 17.)

⁵References to the InterContinental Hotel Group or IHG are references to IHG Hotels Management (Australia) Pty Ltd (ABN: 33 008 413 367) and its affiliates, who have been engaged by a Mulpha Group entity to manage its IHG hotels assets.

Actions to Assess and Address Modern Slavery Risk

Governance

The Mulpha board of directors is ultimately accountable for the performance and affairs of the Group. The board of directors are responsible for the overall risk management strategy and directives for implementation to ensure that the principles and requirement of managing risks are consistently adopted throughout the Group.

Recognising that strengthening our governance processes ensures continued, growing and a unified progress in Q1 2023 a Sustainability Committee was established in accordance with a resolution passed by the Mulpha Australia board of directors. The Sustainability Committee are committed to:

- aligning our strategy and growing our business in a way that promotes sustainable and responsible business objectives;
- integrating sustainability issues into our investment decision-making and business operations; and
- life-cycle sustainable design principles from conception through to construction and long-term performance across our developments.

The sustainability charter outlines the purpose of the committee, its composition, authority, and duties and responsibilities and includes establishment and tracking of measurable human rights objectives (including recognising Group progress)

In 2022 Quarterly reports were provided to the to the Executive led Risk Management and from Q1 2023 reporting was transferred to the newly formed Sustainability Committee. Reporting includes:

- developing and implementing Mulpha’s group wide approach for identifying and managing modern slavery risk in the Group’s supply chains;
- ensuring consistent processes around supplier data management;
- considering allocation of responsibilities across the Group;
- Building and collaborating with key business partners to strengthen the Group’s response to modern slavery; and
- review of modern slavery reports prior to Board of Director approval.

We are committed to high standards of conduct and ethical behaviour across the business to ensure that individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported. Our Whistleblowing Policy articulates the avenues which employees and other stakeholders can raise concerns of actual or suspected misconduct. Appropriate remediation steps are taken in line with our governance framework.

There have been no incidents of modern slavery raised in the reporting period.



Actions to Assess and Address Modern Slavery Risk

Group Policies and Procedures

Mulpha is committed to maintaining a high standard of ethical conduct in its business and corporate governance. In line with our ongoing commitment to strengthen group governance we reviewed our policy suite and the Risk Management Committee approved Mulpha's:

- Sustainability Policy;
- Heritage Policy;
- Supplier Code of Conduct; and
- Human Rights Policy.

Each policy is publicly available on our re-freshed Mulpha website which undertook a full redesign in 2022.

Recognising that an inclusive and unified Mulpha approach allows the Group to promote companywide sustainable initiatives (including modern slavery and human rights) all people managers are encouraged to regularly engage employees to consider business appropriate sustainable outcomes in their day-to-day decision making.

Within our internal governance framework, we have several policies that set our expectations for employees and suppliers to act honestly and in good faith, comply with all applicable laws, rule, regulations (both in letter and in spirit), and to not discriminate unlawfully or engage in any behaviour that is harassing or bullying, or act in any way that puts the health or safety of employees or contractors at risk.

All staff communications throughout the year encouraged all employees to familiarise themselves with the content and spirit of Group policies.

Our key policies relevant to modern slavery are set out in the table on the following page:



Policy	Purpose and relevance to Modern Slavery	Policy Communication
Sustainability Policy	Our commitment to aligning our strategy and growing our business in a way that promotes sustainable initiatives (including modern slavery and human rights) and provides a positive impact to the environment and local communities.	Available on our website Sustainability - Mulpha People managers are encouraged to regularly engage employees.
Human Rights Policy	Recognition that our supply chain is complex and that there is potential to directly cause, contribute to or be directly linked (through another entity such as a principal contractor in the construction industry) to modern slavery. The policy sets out our standards in relation to human rights and that we actively engage and consult with relevant business units and entities and formally report to the relevant committee.	Available on our website Sustainability - Mulpha People managers are encouraged to regularly engage employees.
Supplier Code of Conduct	As part of our ongoing commitment to operate responsibly, and to ensure we engage suppliers who are aligned with these commitments, Mulpha has certain expectations of its suppliers, which are documented within this Supplier Code of Conduct.	Available on our website Sustainability - Mulpha People managers are encouraged to regularly engage employees and suppliers to ensure they are familiar with the content and spirit of the code.
Heritage Policy	As part of our ongoing commitment to operate responsibly we are committed to: <ul style="list-style-type: none"> – protecting, conserving and investing in our heritage listed assets; – ensuring our heritage listed properties are maintained, renovated and restored in compliance with all relevant laws and regulations; – securing our heritage listed assets for sustainable reuse and raising customer awareness of each asset’s heritage value; – recognising and minimising our asset impacts on the Great Barrier Reef Marine Park as a World and National Heritage Site; and – applying an ethical approach to our business 	Available on our website Sustainability - Mulpha People managers are encouraged to regularly engage employees and suppliers to ensure they are aware of the heritage significance of our assets.
Code of Conduct	Our commitment to observe and adhere to high standards of corporate responsibility and conduct ourselves in accordance with these standards. The Code is intended to provide guidance for directors, senior executives and other employees regarding the standards we expect in the conduct of our business. The Code guides us to operate at high standards of business integrity, to comply with the relevant laws and regulations and to ensure that the Code is never compromised for the sake of results.	Available to all employees on Mulpha’s SharePoint page. Signed by all new employees on induction.
Anti-Bribery and Corruption Policy	Our commitment to maintaining a high standard of ethical conduct in business and corporate governance and our zero-tolerance approach towards all forms of corruption.	Available on our website Corporate Governance - Mulpha
Whistle-blower Policy	Developed to ensure high standards of conduct and ethical behaviour across the business and to provide assurance that individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported.	Available on our website Corporate Governance - Mulpha
Enterprise Risk Management Policy	The purpose of the Enterprise Risk Management Framework is to assist the organisation in protecting and creating value by managing risks and integrating risk management into decision making.	Available to all employees on Mulpha’s SharePoint page.
Health, safety and Environment Policy	Our commitment to protecting the health and safety of all persons in the workplace including employees, contractors and other visitors.	Available to all employees on Mulpha’s SharePoint page. Provided to all new employees on induction. Regular WHS communications from a dedicated WHS Manager.
Model contract terms	A review of high-risk (industry) contracts, namely construction, was conducted and model modern slavery clauses were developed and provided to the Development business to ensure our standard terms and conditions includes that Mulpha’s contractors and suppliers have an obligation to identify the risk of, and prevent the occurrence of, modern slavery within its organisation and supply chain, and to report to Mulpha in relation to their modern slavery risk management.	Managed by internal legal for inclusion in all relevant contracts.

Actions to Assess and Address Modern Slavery Risk

Our operation - Ongoing engagement

Through 2021 and 2022 in response to identified increased risk as a consequence of COVID-19, we engaged with each of our assets through our key operational business units including legal, HR and Health and Safety. Engagement was maintained through;

- increased communication and correspondence;
- WHS review of each sites COVID-19 Safety-Plan;
- increased WHS training tailored to the requirements of each asset;
- review of protocols and procedures in place to protect vulnerable groups; and
- encouraging our employees to raise concerns in relation to fair treatment of employees or contractors.

Following the easing of restrictions Mulpha recognises that continual engagement in this space is required and is an active property owner focussed on key risks such as work, health and safety.



Due Diligence and Remediation Processes

Following our supply chain risk assessment process, we recognise that systemic risks is embedded in our operations and supply chains and each risk cannot be solved in isolation. In FY22 we completed several initiatives as part of our Group wide approach to modern slavery.

Area	Initiatives	Status
Governance	Strengthened our governance structure through our Sustainability Committee and reviewed our policy suite adding four new policies (Sustainability Policy, Heritage Policy, Supplier Code of Conduct and Human Rights Policy).	
Training	Recognising the importance of professional development rolled out all staff online modern slavery training.	
	Completed a review of our modern slavery posters campaign at InterContinental hotel & resorts as confirmation of our awareness campaigns.	
	Focussed on continual professional development of Compliance Officer and tailored training include Australian Border Force webinars and Supply Chain Sustainability School training courses.	
Risk Assessment	Completed our third risk assessment in Q2 2023 to enhance our understanding of our supply chains and modern slavery risk.	
Actions to Address Modern Slavery - Collaboration	Continued collaboration with key business partners (refer InterContinental case study) to enhance our 'on the ground' approach to modern slavery.	
Actions to Address Modern Slavery	Responded to all requests in relation to modern slavery from various business partners such as conferencing providers.	
	Continued to review processes and recognised the importance of managing high risks suppliers such as cleaners and security contractors.	
Actions to Address Modern Slavery - Contract Terms	Continued review of high-risk (industry) contracts, namely construction, and developed model modern slavery clauses for the Development business to ensure our standard terms and conditions include that Mulpha's contractors and suppliers have an obligation to identify the risk of, and prevent the occurrence of, modern slavery within its organisation and supply chain, and to report to Mulpha in relation to their modern slavery risk management.	
Actions to Address Modern Slavery - Due Diligence	Completed a review of our largest building supplier's key modern slavery procedures.	

Case Study InterContinental Hotel Group⁶:(IHG) Third Party Hotel Operator

Collaboration with our business partners assists in our collective understanding of our direct and indirect supply chains, and we can focus on high risk and high value vendors when engaging with suppliers within our operations. The InterContinental Hotels Group of companies or IHG Hotels Management (Australia) Pty Ltd (IHG) are engaged to provide third party hotel manager services for three of our largest hotel assets being InterContinental Sydney, InterContinental Sanctuary Cove Resort and InterContinental Hayman Island Resort (IHG hotels).

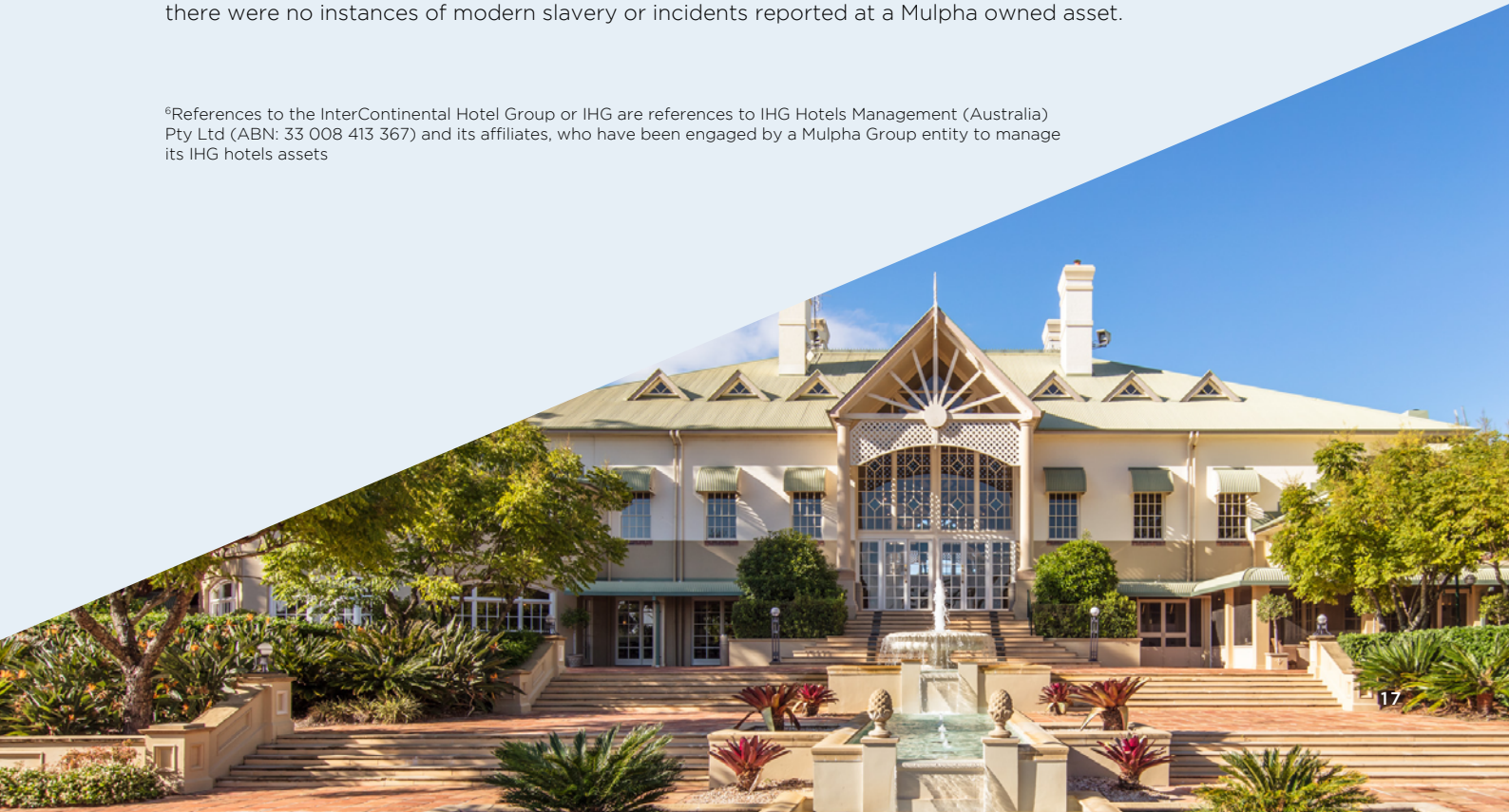
This case study outlines our partnership with IHG and our commitment alongside IHG to understand modern slavery risk within our hotel operations. We recognise that there are risks in the hospitality industry of hotels being used by traffickers to exploit their victims and our customers may not always be at our hotels of their own free will and there are risks within the direct and indirect supply chains of hospitality operations.

Through discussions with IHG we recognise that they are a global leader in the hospitality and tourism sector, have an opportunity to affect positive change in people’s lives and that IHG seek to advance human right through their business activities and by working together with others to identify challenges are committed to ongoing human rights due diligence. Within the framework of each hotel management agreement of the IHG hotels, collaborate with IHG on matters arising out of operations relating to IHG hotels such as assists in:

- a better understanding of issues ‘on the ground’;
- verification of action happening within our IHG hotels operations and their supply chains;
- access to IHG global expertise made available to IHG hotels under terms of each hotel management agreement;
- verification of any issues and confirmation that response is operating as described;
- identification of modern slavery risks as part of ongoing due diligence;
- increased awareness of the risk of modern slavery within the IHG hotels’ supply chain;
- subject to relevant laws and contracts, exchange of information with a key business partner;
- continued focus to develop policies and procedures in support of modern slavery risks.

In 2022 Mulpha commenced periodic modern slavery meetings with IHG to improve collaboration and to understand ‘on the ground’ issues at each of the IHG hotels assets. These meetings are a formal opportunity to report any suspicions of modern slavery or incidents at each of these key assets. In the reporting period there were no instances of modern slavery or incidents reported at a Mulpha owned asset.

⁶References to the InterContinental Hotel Group or IHG are references to IHG Hotels Management (Australia) Pty Ltd (ABN: 33 008 413 367) and its affiliates, who have been engaged by a Mulpha Group entity to manage its IHG hotels assets



Case Study InterContinental Hotel Group⁶:(IHG) Third Party Hotel Operator

Ongoing activities & monitoring

- Employees are provided training on induction, and annually, on the requirements of the Modern Slavery Act. Tracking of training progress and completion rates is discussed at the periodic collaboration meetings.
- Our Group internal audit team verified as part of internal audit processes that modern slavery awareness posters are available at each site.
- Continue to develop our understanding of suppliers within our existing IHG hotels supply chains and IHG’s due diligence processes arising out of operations of the IHG hotels.
- IHG policies provided to employees and suppliers include:
 - Code of Conduct
 - Human Rights Policy
 - Human Rights Brand Standard
 - Responsible Labour Requirements
 - Supplier Code of Conduct
 - Human Resources Policies

Further information on IHG’s progress in accordance with the UK modern Slavery 2015 is available within the IHG’s 2022 Modern Slavery Statement [Modern Slavery - Responsible Business - InterContinental Hotels Group PLC \(ihgplc.com\)](https://www.ihgplc.com/modern-slavery-responsible-business-intercontinental-hotels-group-plc)



Continuous Improvement and Effectiveness Assessment

At present, and as our management of modern slavery risks progress, having ways to assess the effectiveness of our modern slavery risk management are important. The current methods we employ for assessing effectiveness are as follows:







- Regular review and update of our approach to modern slavery risks through consultation with our executive led Risk Management Committee.
- Ensuring our frameworks, policies and procedures maintain efficacy and currency and address modern slavery by way of regular reviews.
- Engagement with high risk and high value vendors and suppliers to ensure they are aware of our commitment in this area.
- Monitoring and reporting on the progressive addition of model terms and conditions that address modern slavery risks into all new and renewed supply and service contracts.
- Continue with a regular training program throughout the Group's operations.
- Ensuring that regular reporting to the Executive Risk Committee occurs and that exceptional items are escalated, as required.



Continuous Improvement and Effectiveness Assessment

Future Priorities

Our actions to date have been focused on setting the internal baselines, communication pathways, and governance models. On a quarterly basis the Sustainability Committee review progress against FY23 priorities. As we progress, we recognise that there are areas we want to improve upon.

FY23 Priorities	
	<p>Risk Assessment</p> <p>Continue annual assessment of high-risk supplier with a focus on increasing the Group's understanding of modern slavery risk within our supply chains and to identify trends within our supply chain.</p>
	<p>Governance</p> <p>Continue to report quarterly through the Sustainability Committee recognising that a unified Mulpha approach allows the Group to promote companywide sustainable initiatives (including modern slavery and human rights).</p>
	<p>Training</p> <p>Continue with a regular training program throughout the Group's operations to enhance awareness and develop internal capabilities to address modern slavery.</p> <p>Continue regular all staff communications to increase awareness of modern slavery throughout the organisation.</p>
	<p>Partner Collaboration</p> <p>Continue to engage with existing business partners with a focus on key asset managers and building contractors to identify areas of improvement across our supply chains and to better understand risk within our supply chains.</p>
	<p>Supplier Due Diligence</p> <p>Expand on our risk assessment processes and enhance our supplier due diligence processes.</p>
	<p>Remediation</p> <p>Continue to engage with relevant high-risk suppliers such as cleaning and security at our assets and principal building contractors at our developments.</p> <p>Review and refresh incident management procedures and deliver training on a centralised incident management reporting system.</p>



Approval

This statement was made in accordance with Section 16 of the Modern Slavery Act 2018 (Cth) and was approved by Mulpha Australia Limited's board of directors on 29 May 2023 and is signed by Seng Huang Lee in his role as Chair of Mulpha Australia Limited.

Seng Huang Lee
Chair
Mulpha Australia Limited

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MULPHA

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Appendix One



Entities that make up the Group are shown below.

Name	Principal Place Of Business / Country Of Incorporation	Ownership Interest	
		2022 %	2021 %
Caldisc Pty Limited	Australia	100	100
HD Diesels Pty Limited – Salzburg Apartments (Perisher Valley) Pty Limited	Australia	100	100
Mulpha Investments Pty Limited – Mulpha Norwest Pty Limited – Norwest Real Estate Pty Limited – Mulpha Menangle Pty Limited	Australia	100	100
Mulpha Core Plus Trust – Norwest City Trust – Norwest Quarter Land Trust (previously Norwest Retail Trust) – Flexi Trust – Mulpha Queensland Property Trust	Australia	100	100
Norwest City Pty Limited	Australia	100	100
Norwest Flexi Pty Limited	Australia	100	100
Mulpha Land Holdings Pty Limited (previously Norwest City Retail Pty Limited)	Australia	100	100
MAL Hayman Pty Limited	Australia	100	100
Mulpha Funds Services Pty Limited (previously Mulpha Funds Management Pty Limited)	Australia	100	100
Enacon Parking Pty Limited	Australia	100	100
Bimbadgen Estate Pty Limited	Australia	100	100
Mulpha Education Group Pty Limited – iLead Training Pty Limited – Mulpha HTMi Australia Pty Limited	Australia	100	100
Swing City Pty Limited (previously Swing City Norwest Pty Limited)	Australia	100	100
Mulpha Education Investments Pty Ltd	Australia	100	-
Mulpha Sanctuary Cove Pty Limited – Mulpha Sanctuary Cove (Alpinia) Pty Limited – Mulpha Sanctuary Cove Marine Village Pty Limited – Mulpha Sanctuary Cove Marina Pty Limited – Mulpha Sanctuary Cove Hotel Investments Pty Limited – Mulpha Sanctuary Cove Hotel Operations Pty Limited – Mulpha Sanctuary Cove Rec Club Pty Limited – Mulpha Events Pty Limited – Mulpha Sanctuary Cove (Developments) Pty Limited – Sanctuary Cove (Real Estate) Pty Limited	Australia	100	100
Mulpha Hotel Management Pty Limited	Australia	100	100
Circa 1 Pty Limited	Australia	100	100
Mulpha Finance Pty Limited	Australia	100	100

Name	Principal Place Of Business / Country Of Incorporation	Ownership Interest 2022 % 2021 %	
Mulpha Hotel Investments (Australia) Pty Limited – Mulpha Hotels Holdings Pty Limited – Mulpha Hotels Holdings Trust – Mulpha Hotels Australia Pty Limited – Mulpha Hotels Australia Trust – Mulpha Hotel Pty Limited – Mulpha Hotel Trust – Bistrita Pty Limited – Hotel Land Trust – Mulpha Hotel Bonds (Holdings) Pty Limited – Mulpha Hotel Bonds Pty Limited	Australia	100	100
Mulpha Australia (Holdings) Pty Limited – Mulpha Hotel Operations Pty Limited – Mulpha Transport House Pty Limited – Mulpha Hotel (Sydney) Pty Limited – Mulpha Hotel (Sydney) Trust	Australia	100	100
Pindari Capital Capri Fund	Australia	100	-
Capri Retail Trust	Australia	100	-
Cairns Esplanade Operations Pty Limited	Australia	100	100
Mulpha Cairns Esplanade Fund	Australia	100	100
Mulpha Finance Holdings Pty Limited – Multiple Capital Pty Limited – Mulpha Private Wealth Pty Limited (previously Pindari Private Wealth Pty Limited) – Mulpha Funds Management Pty Limited (previously Pindari Capital Pty Limited) – Pindari (Shenzhen) Commercial Information Consulting Limited – Mulpha Investment Management Pty Ltd (previously Pindari Investment Management Pty Ltd) – Mulpha Funds Asset Management Pty Limited (previously Pindari Capital Asset Management Pty Ltd) – Mulpha Capri Retail Pty Limited (previously Pindari Capital Capri Retail Pty Ltd) – Mulpha Sussex Holdings Pty Limited – Sussex St Operations Holdings Pty Limited – Pindari Capital Hotel Fund – Sussex St Trust – Pindari Capital Sussex St Pty Limited	Australia Australia Australia Australia China Australia Australia Australia Australia Australia Australia Australia Australia Australia Australia	100 100 100 100 100 100 100 100 100 99 100 100 100 100	100 80 100 100 100 100 100 100 100 99 99 100
Mulpha Queensland Property Pty Limited	Australia	100	100
Mulpha Property Holdings Pty Limited	Australia	100	100
Mulpha Property Holdings Trust – Soak City Victoria Land Trust	Australia	100	100
Mulpha Asset Services Pty Limited	Australia	100	100
Mulpha MTN Limited	British Virgin Islands	100	100
Mulpha Development Holdings Pty Limited – Mulpha Sussex Development Pty Limited – Mulpha Norwest Quarter Development Pty Limited – Mulpha Sanctuary Cove Harbour One Pty Limited	Australia	100	100
Mulpha Core Plus Pty Limited – Mulpha Cambridge Park Trust	Australia	100	100 -
Soak City Victoria Land Pty Limited	Australia	100	100
Mulpha Cambridge Park Pty Ltd	Australia	100	-
Mulpha Hospitality Pty Ltd – Mulpha Hospitality OpCo Pty Ltd	Australia	100	-