

Modern Slavery Statement

The Aventus Group is a listed property group comprising Aventus Holdings Limited (Company) and the Aventus Retail Property Trust (Fund) (together, the **Aventus Group**).

This is Aventus Group's first Modern Slavery Statement (Statement) made in accordance with the Modern Slavery Act (2018) for the financial year ended 30 June 2020 describing our actions to assess and address modern slavery risks. It reflects our ongoing commitment and responsibility to protect against modern slavery risks within our operations and supply chains.

This Statement is provided by the Aventus Group and covers all entities over which the Company and Fund control and report on.

As our first Statement, it outlines the initial actions undertaken by the Aventus Group to understand our operations and supply chain in the context of modern slavery risks, to identify any areas of risk and to enable us develop and embed protective and remediation mechanisms as such practices will never be acceptable in any part of our business.

In assessing how we can play a role in combating modern slavery, our team is guided by our Group values of:

People First

Own It

Find a Better Way

These values encourage the recognition of the value of all people in, and impacted by, our business, accountability for our actions and always striving to for continuous improvement to implement positive changes.

This statement has been approved by the Board of the Aventus Group on 24 March 2021.



Darren Holland
CEO



Introduction

The Aventus Group (AVN) is subject to the Modern Slavery Act 2018 (Cth) ('Act') that commenced operation on 1 January 2019 that requires reporting entities subject to the Act, to produce an annual modern slavery statement.

The Aventus Group Modern Slavery Statement sets out the following information in compliance with its obligations, to:

- identify the reporting entity as the Aventus Group and all related entities it owns or controls;
- describe the Group structure, operations and supply chains;
- describe the risks of modern slavery practices in our operations and supply chains;
- describe the actions taken to assess and address those risks, including due diligence and remediation processes;
- describe how we will assess the effectiveness of such actions;
- describe the process of consultation with any entities that the reporting entity owns or controls;
- include any other information that we consider relevant.

The Reporting Entity

The Aventus Group is a listed property group comprising Aventus Holdings Limited (Company) and the Aventus Retail Property Trust (Fund) (together, the Aventus Group). Shares in the Company and units in the Fund are traded collectively as stapled securities on the ASX under the code AVN.

This Statement is provided by the Aventus Group and covers all entities over which the Company and Fund have control for accounting purposes. Please see the Aventus Group Structure in Table 1 and the Governance and Structure in Table 2.

It satisfies the consultation obligation as there is a Group governance structure that applies to all subsidiary entities to ensure that all corporate actions are overseen at the Group level.

Our structure, operations and supply chains

The Aventus Group undertakes the business of owning and managing a Large Format Retail (LFR) portfolio which comprises property management, development management and funds management services, and acts as the responsible entity for the Fund.

It also provides property and development management services for external owners of assets and other third parties via an unlisted property syndicate.

As at 30 June 2020, the Group had 20 LFR centres under management across Australia valued at circa \$2 billion.

The majority of the Group's earnings are derived from rental income, with other ancillary income derived from external fees and other sources.

A national office is located in Sydney, NSW with centre management offices located in NSW, Victoria, Queensland, and SA.

Approximately 70 team members are employed across centres and in our Sydney office.

For more information about our business and structure please refer to our 2020 Annual Report available of the Aventus Group website at aventusgroup.com.au.

Table 1: Aventus Group Structure, Operations and Supply Chains – Overview

Structure	Operations	Supply Chains
ASX Listed and Stapled Property Group	Ownership and management of the Aventus Retail Property Fund which comprises Large Format Retail Shopping Centres	Australia
AHL owns and controls all corporate subsidiaries and ARPF owns all property sub-trusts	Property Management Fund Management Development services Corporate Offices	See Table 3
Subsidiary companies comprise the property and funds management entities, property owning entities and entities that perform the various corporate actions of the Group	Australia	The majority of our goods and services are supplied by Australian based companies
The LFR centres operate under the Aventus Super Centre, Home of Hub brands in the locations where they are situated	20 Large Format Retail centres located in NSW, Qld, Vic, SA and WA Approximately 70 team members across the centre and corporate offices located in Australia	
Aventus Holdings Limited: ACN 627 640 180	The types of supply arrangements in place comprise long term operational type supplies, office rental and shorter term development and project suppliers	
Aventus Retail Property Fund ARSN 608 000 754		
Level 33 Governor Macquarie Tower One Farrer Place Sydney NSW 2000	The Aventus Group has no joint venture arrangements in place but does manage one externally owned centre and one property syndicate owned centre (which it holds an ownership interest in)	

Table 2: Ownership & Governance structure



The Aventus Group supply chain can be viewed across the different types operations involved in the management of 20 LFR centres and includes centre management and operations, development activities within LFR centres and the management of corporate team and support services.

Table 3: Supply Chain

Key Business Categories	Types of suppliers engaged
Centre Management and Operations	Suppliers of property management services such as cleaning, security, waste management, air conditioning, landscaping and maintenance services, vertical transport and essential services such as energy, sewage and water
Development activity	Builders, contractors, materials suppliers, design consultants, and tradespeople
Centre and corporate offices	Office supplies, corporate projects, employment and training of team, external legal advice, leasing services, IT infrastructure and support services and travel.

The risks of modern slavery practises in the operations and supply chains of the Aventus Group

The Aventus Group will never knowingly participate in modern slavery practices in its directly controlled operations.

Addressing modern slavery risks in our supply chains is a process which the Aventus Group commenced in FY20 and we will continue to bring increased focused to strengthen and refine our response in future reporting cycles.

The Aventus Group has assessed that the risk of modern slavery practices within its day-to-day operations and direct workforce is low, as the Aventus team are primarily working in property management and ancillary professional service roles exclusively within Australia. Many companies we deal with are also subject to the Modern Slavery Act.

Our structure, operations and direct workforce are also managed through our people policies and practises, the ethical standards and behavioural conduct requirements that we exhibit in all our dealings, both internal and external, and always in accordance with our Codes of Conduct, and other relevant policies which are approved by the Board.

Our FY20 ESG Report details our working environment and commitment to provide a safe and healthy working environment. A copy of this report is available on our website.

In relation to the risk of exposure to modern slavery practises in our supply chain, the risk is considered greater than in our direct workforce. In particular, certain services we require in the day-to-day operations have been highlighted as risk areas in this regard and, in particular, cleaning contractors have been an area of increased focus and awareness. It has been shown that this industry is more likely to employ lower paid foreign, unskilled workers who are potentially at a heightened risk of exploitation and we have made this area our first area of focus.

In FY21 we shall continue to expand our review into other supply chains where 'at-risk' workers are likely to be employed.

The actions taken by the Aventus Group to assess and address these risks including our due diligence and remediation processes

In FY20, Aventus commenced determining what actions we must take to assess and address the risks of modern slavery practises occurring in our operations and supply chains. To that end, we are adopting the UN Guiding Principles with respect to undertaking human rights due diligence. We have commenced applying these to our ongoing management processes. This will assist us to identify, prevent, mitigate and account for how the Aventus Group addresses actual or potential adverse human rights impacts in our operations and supply chains, including modern slavery.

Further, we have adopted the UN Guiding principles with respect to remediation.

Our approach is summarised in Table 4 below.

Table 4: Due Diligence & Remediation

a. Due Diligence

Due Diligence	Operations	Suppliers
Identifying and assess actual and potential human rights impacts by screening all new suppliers for modern slavery risks	All such practices illegal and will not be tolerated in our operations	Existing and new suppliers and reviewed and screened specifically for modern slavery risks
Integrate the findings across the Group and identify appropriate action to address impacts	Share findings of screening process and introduce specific training to team	Enforcing response to any adverse findings through mechanisms contained in our Supplier Code of Conduct or ceasing engagement
Tracking the Group's performance to check whether impacts are being addressed	Assessing increasing team competencies to identify risk of modern slavery practices	Completing internal audit of supplier screening processes
Publicly communicate what Aventus Group is doing	Increasing team awareness of modern slavery risks	Annually publishing Modern Slavery Statement and making public responses where necessary

b. Remediation Steps

Identification	Response
The entity itself has caused or contributed to adverse impact such as modern slavery	'Make good' the adverse impact by restoring the victim to the situation they would be in if the adverse impact had not occurred.
Modern slavery practises are discovered within Group supply chain	Work with the relevant entity that caused the impact to prevent or mitigate the harm and prevent it recurrence
Unacceptable risk that modern slavery practices may be present in our supply chain	Ending the business relationship with any entity if we determine unacceptable risk of modern slavery practices

FY21 Annual Procurement Review: Portfolio Cleaning Services

Aventus Group expect all our suppliers to operate in accordance with all applicable anti-modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking and child labour. We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection and team inclusion and diversity.

The Aventus Procurement Process has implemented a significant focus on modern slavery and all supplier proposals are assessed against this requirement. Suppliers will be required to provide information on how their business addresses these risks and the process in place to prevent any instances of modern slavery occurring.

The Aventus Group completed a review and tender of all cleaning service providers in the portfolio in FY21 and we have developed the following contractual rights with our new cleaning service providers:

- mandate suppliers to be active in identifying modern slavery risks through their supply chain and immediately notify Aventus if any allegation or complaint is made against the business relating to modern slavery;
- contain terms that are consistent with the Act;
- to monitor compliance with our Supplier Code of Conduct, which includes a prohibition on any unlawful employment practices that include an increased modern slavery risk;
- to request further information at any time in relation to employment practices and about sub-contractors; and
- the ability to undertake further engagement and conduct any further investigations where we believe the information provided is not sufficient.

There is an annual renewal of all cleaning contracts at the election of the Aventus Group which enhances our ability to influence positive behaviours by ensuring that our suppliers understand that renewal is dependent on there being no adverse findings or an unacceptable level of risk with respect to modern slavery practices.

How the Aventus Group assesses the effectiveness of actions being taken to assess and address modern slavery risks

The Aventus Group acknowledges that it has commenced its journey to fully implement the actions required to assess and address the risks of modern slavery. Key to our continuous improvement will be the introduction of mechanisms to check whether our actions are working. In FY21, we will broaden the review to develop a greater understanding of potential exposures across all our suppliers, and:

- Continue to assess the potential modern slavery risks in our operations and supply chains with emphasis on high-risk geographical locations and business transactions;
- Review all company policies and identify those that may be impacted by modern slavery considerations;
- Develop training for team in understanding and recognising modern slavery risks;
- Expand screening program and conduct further due diligence on suppliers.
- Review all key service supplier contracts to ensure they contain terms that are consistent with the Act.

We will further ensure that the Aventus Group assesses the effectiveness of its actions and will be establishing the following processes in FY21 to commence to assess the effectiveness of our actions:

- Establishing a process to regularly review the actions we take by establishing an annual leadership management review of our response to modern slavery;
- Regularly checking our risk assessment processes to ensure they remain up-to-date and that there are triggers to identify when an update to a risk assessment is required;
- Setting up a process to provide regular engagement and feedback within our operations;
- Conducting internal audits and monitoring all specific steps to assess and address modern slavery risks to determine if mitigation measures have been consistently actioned;
- Tracking our actions and measuring impact in relation to supplier and team engagement and level of awareness;and
- Investigate partnering with an industry group to undertake an independent review of our actions.