



CROMWELL
PROPERTY GROUP

MODERN SLAVERY STATEMENT

This is a joint Statement on behalf of:
CROMWELL CORPORATION LIMITED ACN 001 056 980

and

CROMWELL DIVERSIFIED PROPERTY TRUST ARSN 102 982 598
the responsible entity of which is Cromwell Property Securities Limited ACN 079 147 809

For Financial Year Ending 30 June 2021



1. ABOUT THIS STATEMENT

The *Modern Slavery Act 2018* (Cth) (the Act or MSA) requires certain entities to prepare and publish an annual modern slavery statement. This Modern Slavery Statement (Statement) has been prepared and approved as required by Section 14 of the Act, by Cromwell Property Group (Cromwell, we, us) on behalf of the reporting entities:

- Cromwell Corporation Limited; and
- Cromwell Diversified Property Trust (the responsible entity of which is Cromwell Property Securities Limited CPSL), and their controlled entities.

References to Cromwell in this Statement relate to the reporting entities jointly. Cromwell Property Group is listed on the Australia Securities Exchange (ASX code: CMW)

with headquarters in Brisbane. Its registered office is located at Level 19, 200 Mary Street Brisbane QLD 4000. For further information, please visit www.cromwellpropertygroup.com

This Statement covers the period starting on 1 July 2020 and ending on 30 June 2021 (Reporting Period or FY21). It describes how Cromwell has identified, assessed and addressed the risks of modern slavery in our operations and supply chains and summarises our achievements and aspirations over time to continuously mature our response to modern slavery risks.

This Statement includes the mandatory reporting criteria specified in Section 14 of the Act, as referenced below.

| THE MSA MANDATORY REPORTING CRITERIA | SECTION |
|--|---------|
| Identify the reporting entities | 1 |
| Describe Cromwell's structure, operations and supply chains | 4 |
| Describe the risks of modern slavery practices in Cromwell's operations and supply chains and its controlled entities | 4 |
| Describe the actions taken by Cromwell and its controlled entities to assess and address those risks, including due diligence and remediation processes | 5 |
| Describe how Cromwell assesses the effectiveness of such actions | 6 |
| Describe the process of consultation with Cromwell's controlled entities and between the reporting entities covered by this joint modern slavery statement | 3 |
| Other information that Cromwell considers relevant | 6.1 |

2. APPROVAL OF STATEMENT

The boards of Cromwell Corporation Limited and Cromwell Property Securities Limited as responsible entity for Cromwell Diversified Property Trust approved this statement and authorised it to be signed by the Managing Director on 16 December 2021.



Jonathan Callaghan
Managing Director, Cromwell Property Group

Date of Signature: 31 December 2021

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3. OUR APPROACH

3.0 APPROACH

Cromwell aims to conduct its business and investment activities responsibly, always acting with integrity. Modern slavery is a serious global issue and one that requires an effective societal response from business leaders that strengthens over time. Cromwell recognises that it has a role in this response and a responsibility to generate awareness and implement steps to uphold human rights and minimise the risk of modern slavery practices occurring in its operations and supply chains.

The ‘risks of modern slavery practices’ means the potential for Cromwell to cause, contribute to, or be directly linked to modern slavery through its operations and supply chains. This Statement captures the things we have done to build on the work described in our FY20 statement and summarises the progress achieved during FY21. Our activities have been wide ranging and include industry collaboration, ongoing training programmes and governance initiatives to assess, address and remedy the presence of potential modern slavery in Cromwell’s operations and supply chains.

To ensure a unified global approach, Cromwell’s response to managing modern slavery has been developed at a group level. Our procurement policies and practices, risk assessment methodology, supplier diligence and response mechanisms described in this Statement apply equally across both mandatory reporting entities and to all entities Cromwell owns or controls.

Our framework aligns to internationally recognised standards and principles, including the UN Guiding Principles on Business and Human Rights, International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, and the ISO 20400 Sustainable Procurement - Guidance. The mitigation

measures and controls are incorporated within operations and integrated within our Enterprise Risk Management Framework and other policies.

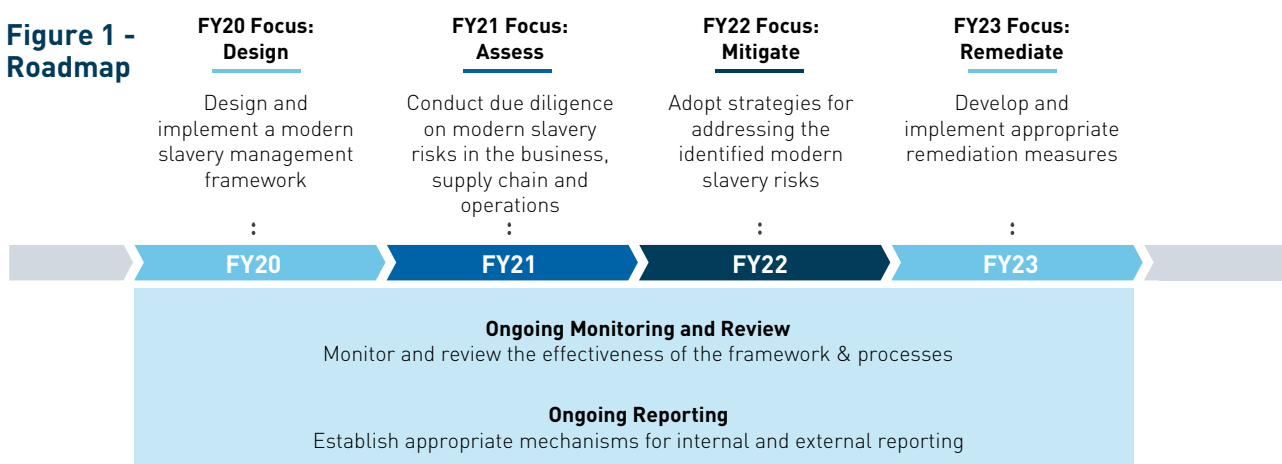
Key to an ongoing, continuously improving modern slavery response over time is stakeholder engagement. Our aim is to assist both our internal and external stakeholders to improve their understanding, due diligence processes and performance regarding human rights while maintaining legislative compliance and upholding our own corporate values.

Both reporting entities have engaged in a process of joint consultation in preparing this Statement and in relation to Cromwell’s overall approach and response to modern slavery risk. The Roadmap in Figure 1 outlines associated activities we have either undertaken or have planned.









We have described our governance structure and reporting arrangements in section 6.0.3, Before approval, Cromwell’s Audit and Risk Committee, the Chief Executive, the Head of Risk & Compliance and other internal stakeholders having responsibilities across the Cromwell Group had input to this Statement. The board of Cromwell Funds Management Limited has also reviewed the draft Statement. Relevant internal teams within our European operations have been consulted on the draft Statement, and similarly, they have consulted with head office teams on the FY21 Anti-Slavery and Human Trafficking Statement by Cromwell European Holdings Limited.

Our involvement in industry initiatives, deployment of employee training across our platform and engaging in supplier collaboration and ongoing continuous improvement have also provided opportunities to obtain feedback and inform our Statement.

Figure 1 - Roadmap



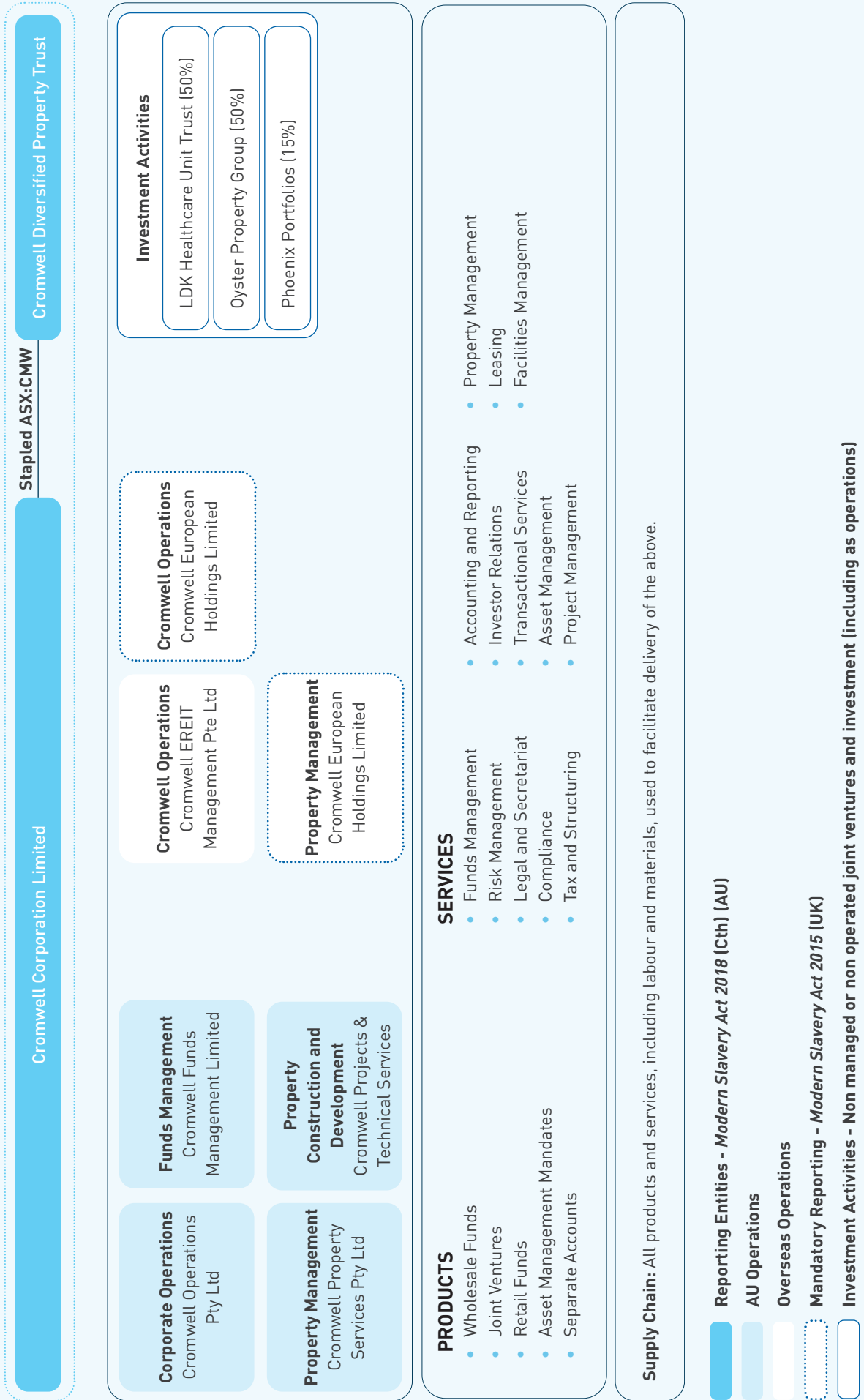
3.1 FY21 OBJECTIVES STATUS

| OBJECTIVE (AS PER CROMWELL'S FY20 STATEMENT) | STATUS |
|--|--|
| Launch the Group Procurement Policy to ensure consistent risk assessments |  ACHIEVED |
| Develop supplier engagement plans, considering the sphere of influence and industry risks |  ONGOING |
| Continue to apply procurement best practice to business-critical systems and controls |  ONGOING |
| Double participation rates for Cromwell nominated companies within the Property Council of Australia (PCA) Modern Slavery Supplier Platform |  ACHIEVED |
| Provide suppliers access to awareness training to promote best practice procurement activities, including the identification and assessment and management of modern slavery |  ACHIEVED |
| Upskill key staff in sustainable procurement and modern slavery risks |  ACHIEVED |
| Manage adherence to policy expectations and continuous development of the framework to identify, manage and monitor modern slavery risks associated with suppliers |  ONGOING |
| Develop a compliance plan to maintain functional independence in the internal review of key procurement processes |  ONGOING |

3.2 FY21 SNAPSHOT

1. Extended risk mapping outside of Australia and New Zealand and risk mapped all active European and Singaporean suppliers to 40 risk categories to determine the inherent modern slavery risks in our tier 1 supply chains;
2. Continued our partnership with the Property Council of Australia (PCA) for their Modern Slavery Supplier Platform, which holds nearly 4500 assessments as at 30 June 2021;
3. Supported Bureau Veritas with the independent verification of risk assessments within the PCA Modern Slavery Supplier Platform to enable insight into trends and continuous improvement opportunities;
4. Partnered with Lewcon Airconditioning to support capacity-building for smaller businesses with manufacturing supply chains; and
5. Provided all employees with a common global platform for conducting vendor due diligence and risk assessments.

Figure 2 - Structure Diagram



4. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

4.0 OUR STRUCTURE

Cromwell is an internally managed Australian Real Estate Investment Trust, listed on the Australian Securities Exchange, and is a stapled enterprise consisting of Cromwell Corporation Limited ACN 001 056 980 (the Company) and Cromwell Diversified Property Trust ARSN 102 982 598 (the Trust), the responsible entity of which is Cromwell Property Securities Limited ACN 079 147 809 (the Manager). This structure is shown opposite in Figure 2.

Cromwell has adopted a global approach to modern slavery and supply chain management and responds locally to statutory requirements, including under the UK *Modern Slavery Act* (2015). Unless otherwise stated, the actions discussed in this Statement are applied on a global scale in relation to the operations and supply chains of Cromwell and its controlled entities¹. For further information specifically relating to our overseas operations, please refer to our UK Modern Slavery Statement

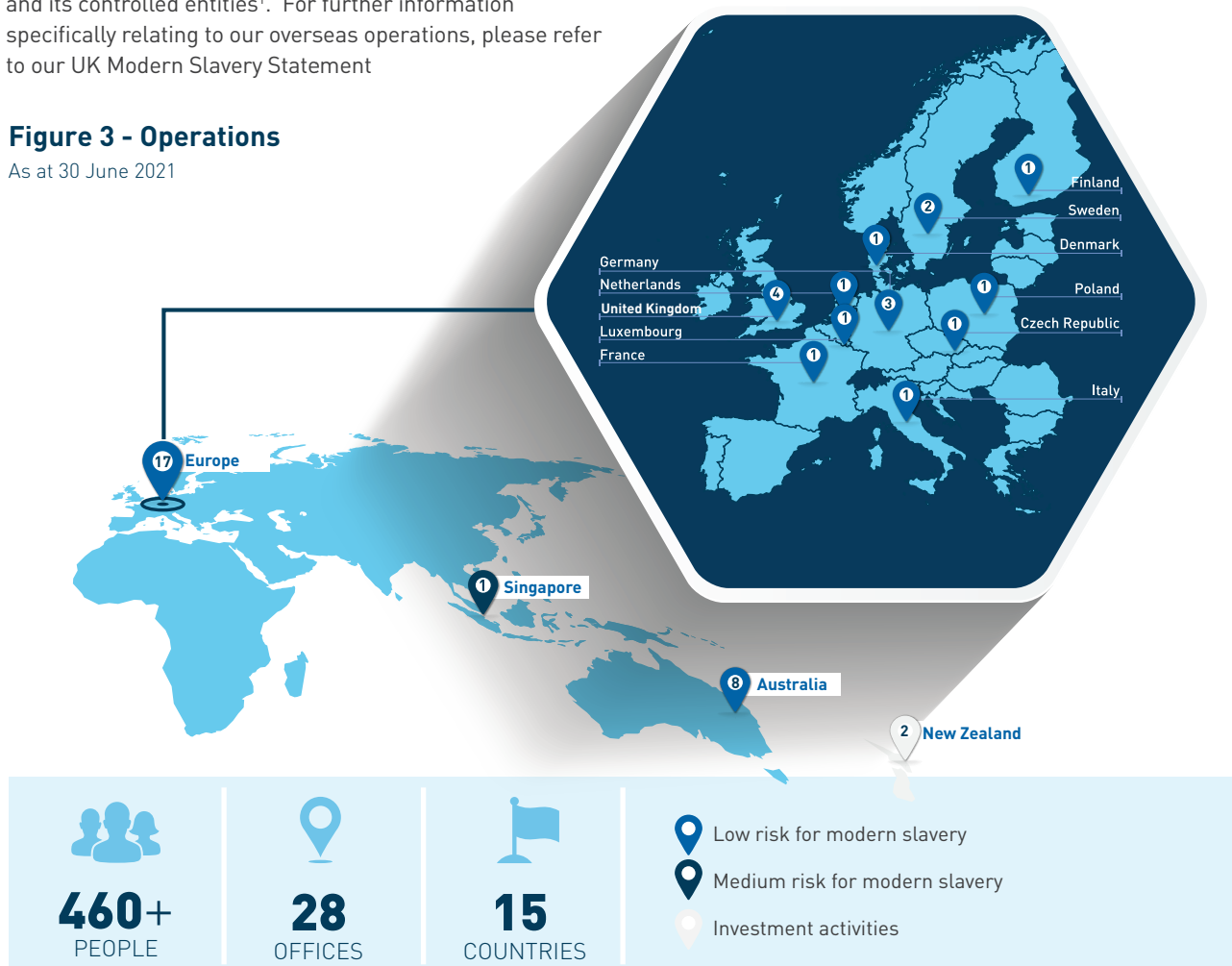
4.1 OUR OPERATIONS

As a global real estate investor and manager, our operations encompass the acquisition, management, administration, leasing, development and disposal of property assets, with our operations undertaken by an in-house team of legal, asset, facilities, project, finance, analysts and property professionals.

In this Statement, 'operations' means the activities undertaken by Cromwell, or an entity owned or controlled by Cromwell, to pursue business objectives and strategy both in Australia and overseas. The term includes the direct employment of workers as shown in Figure 3 - Operations, and the delivery of the Products and Services described in Figure 4 - Products and Services.

Figure 3 - Operations

As at 30 June 2021



¹ Refer to pages 117-119 of FY21 Annual Report for a comprehensive list of the controlled entities and countries of registration.

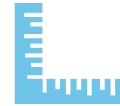
AU\$ 11.9 BILLION / € 7.6 BILLION
 ASSETS UNDER MANAGEMENT



220+
PROPERTIES



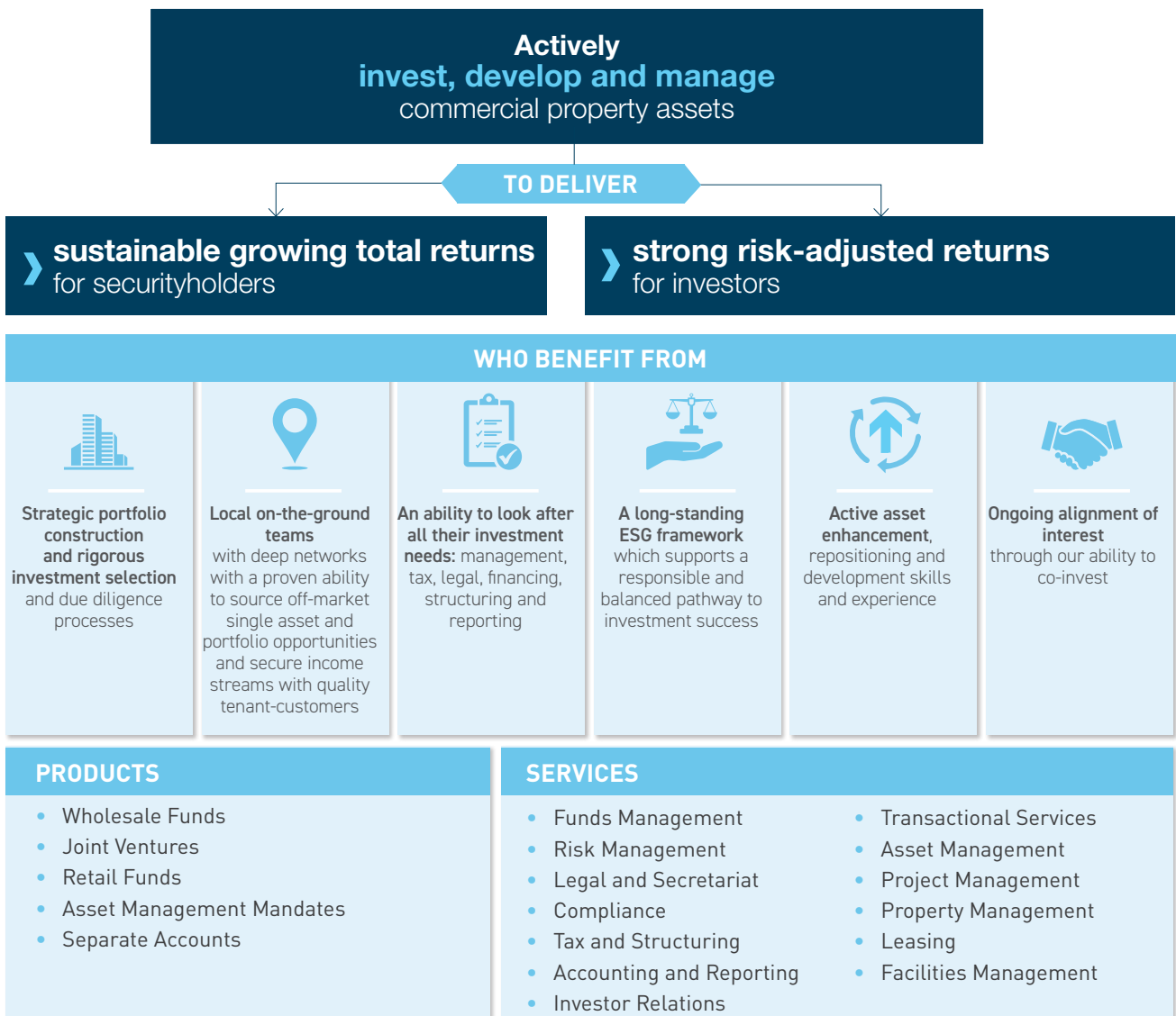
2,700+
TENANTS



3.4M
SQM

As at 30 June 2021

Figure 4 - Products and Services



We have not conducted a risk assessment of supply chains arising through our investment activities that relate to non-managed or non-operated joint ventures, except to the extent that they are applicable as an operational activity and to assess at a thematic level the modern slavery risks in those investments. Cromwell will continue to leverage opportunities to influence corporate partnerships to further mitigate the risks associated with modern slavery over time.

4.2 OUR SUPPLY CHAIN

In this Statement, 'supply chain' means the products and services (including third-party labour) that contribute to Cromwell's products and services, as shown in Figure 4. This includes products and services sourced domestically or overseas and extends beyond direct suppliers.

In FY20, Cromwell developed a risk-based approach to managing existing and new suppliers. Consultants were engaged to assist in categorising our suppliers by industry and risk exposure to modern slavery practices. The methodology considered the risk indicators shown in Figure 5 – Modern Slavery Risks, discussed further in section 5, and the approach remained unchanged during FY21.

Our suppliers fall within one of two distinct supply chains - either supporting the delivery of our property management division or enabling our corporate operations. Our due diligence methodology is consistent regardless of the applicable activity, however, because industry risks vary, we consider that these nuances are best considered in the grievance and remediation measures developed.

As managers of property assets, the greatest expenditure and exposure to modern slavery practices resides in the supply chains of our service providers, and the goods and materials they supply in the construction, maintenance, repair and operations of these properties.

We procure a wide range of goods and services from our tier 1 suppliers, across Australia, Europe and Singapore. An overview of the associated high risk industries is included in Table 1, which describes Cromwell's supply chains, including the supply chains applicable to entities owned or controlled by Cromwell, both within Australia and globally.

In addition to the indirect suppliers explicitly stated in Table 1, we recognise that any goods or services procured by a tier 1 supplier may incur a high-risk rating. The suppliers of these goods and services to our tier 1 suppliers are currently considered outside of the direct sphere of influence and will be indirectly addressed as part of the tier 1 supplier engagement process.

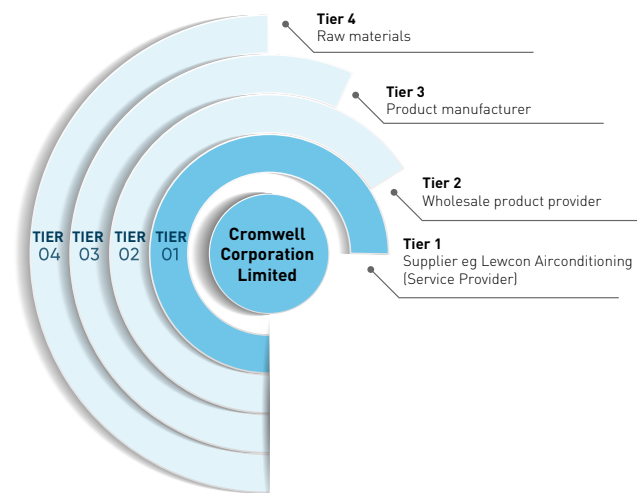


Figure 5 - Modern Slavery Risks

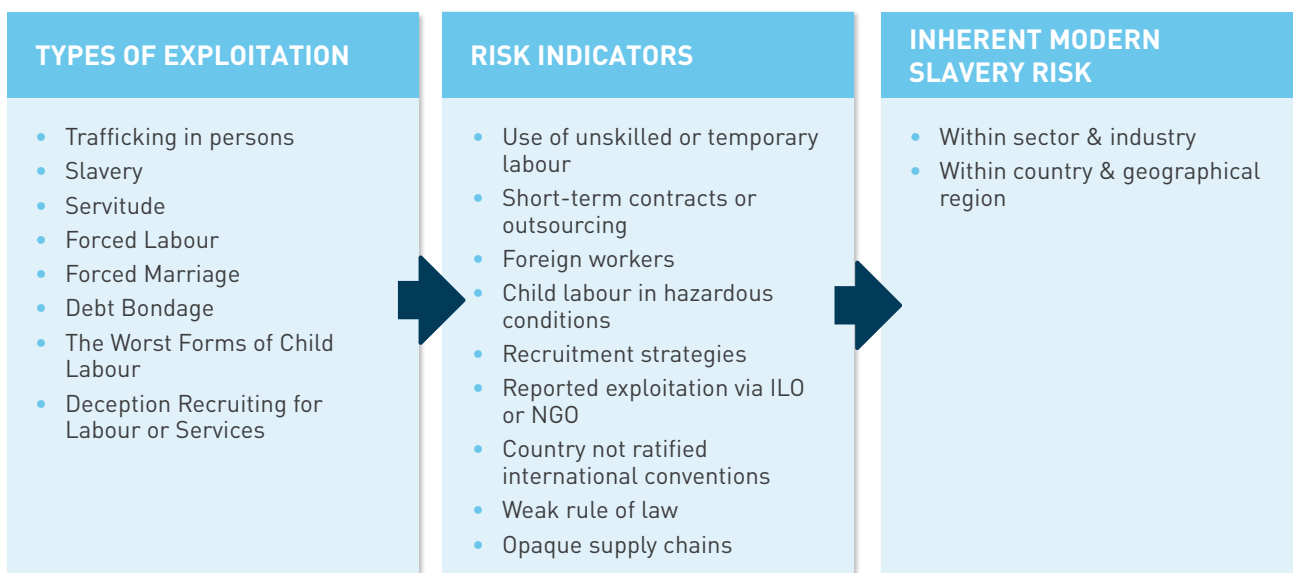


Table 1 - Cromwell Property Group Supply Chain

| Reporting entity | | Activities | Supply Chain Overview | High Risk (for the modern slavery risks or risk indicators noted in Table 2) | | |
|-------------------------------------|--|---|---|---|--|--|
| | | | Includes a summary of the supply chain applicable to operations associated with the activity | Tier 1 – Direct Suppliers | | Indirect Suppliers |
| | | | | Products provided by suppliers | Services provided by suppliers | Products & Services used by indirect suppliers in the supply chain |
| Cromwell Diversified Property Trust | | Corporate Operations <i>Corporate operations not otherwise specific to a specific business activity</i> | Corporate costs of operating the business, including direct employees, consultants and advisors of professional services. | IT Equipment Office supplies Consumables Personal protective equipment (PPE) | IT Services Catering Cleaning and janitorial Travel and Accommodation | Building maintenance and repair materials PPE |
| | | Property Management <i>Applicable where appointed to maintain operational control</i> | Suppliers of services including cleaning, security, landscape, building maintenance, waste collection, utilities, materials, consumables, construction and fit out. | Building maintenance and repair materials Construction supplies PPE | Cleaning and janitorial services Security Services Telecommunications | Building maintenance and repair materials, including solar panels PEE |
| Cromwell Corporation Limited | | Funds Management <i>Applicable where appointed to manage the investment vehicle</i> | Corporate costs of operating the business, including direct employees, consultants and advisors of professional services. | Refer to Corporate Operations above | | |
| | | Property Construction and Development <i>Applicable where appointed to manage or partner for the delivery of a specific capital project</i> | Major refurbishments and construction, including joint ventures. | Refer to Corporate Operations above | | |

Our FY20 assessment identified that whilst there are high risk exposures identified in our tier 1 suppliers, these are predominantly related to the risk associated with raw materials contained within goods purchased, rather than services provided by them. The majority of our operational expenditure relates to low risk corporate and professional services, with the greatest expenditure being accounted for in our directly employed property management teams.

Cromwell maintains a 'customer focused approach' to supplier engagement. This involves actively engaging with key identified groups to better understand industry specific risks and opportunities and how to effectively develop our supplier relationship to reduce the risk of modern slavery. This approach is supported by encouraging stable, long-term relationships with reputable suppliers, who are

evaluated and monitored on an ongoing basis, particularly regarding the risk indicators highlighted in Table 2. An example of the above engagement process is included in our case study with Lewcon Airconditioning in Section 6.0.2.

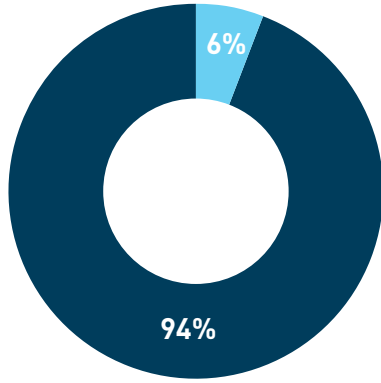
Based on our FY21 review, no increase in inherent risk exposure has been caused due to operational change, activity or procurement practices. However, the global Covid-19 pandemic may have caused an aggregate increase in the prevalence of modern slavery worldwide. This includes the production of solar panels and PPE, which we have now identified and included as specific high-risk products within our supply chain and accordingly have been added to Table 1.

Table 2 - High Risk Category Indicators

| Risk Type | High Risk Category | Indicators |
|-------------------------|---|---|
| Product & Services Risk | IT Equipment | <ul style="list-style-type: none"> Use of unskilled, temporary or seasonal labour. Use of short-term contracts and outsourcing. Use of foreign workers or temporary or unskilled labour to carry out functions which are not immediately visible because the work is undertaken at night time or in remote locations, such as security or cleaning. Use of child labour in hazardous conditions, such as underground, with dangerous machinery or tools, in unhealthy environments (including where they are exposed to physical or sexual abuse), or for long hours. Recruitment strategies by suppliers, their agents or labour hire agencies target specific individuals and groups from marginalised or disadvantaged communities. |
| | Office supplies | |
| | Consumables | |
| | IT Services | |
| | Building maintenance and repair materials | |
| | Construction supplies | |
| | Telecommunications | |
| Sector & Industry Risk | Catering | <ul style="list-style-type: none"> Cost requirements or delivery timeframes might require suppliers to engage in excessive working hours, make cost savings on labour hire or rapidly increase workforce size. The development of the product or delivery of the services has been reported as involving labour exploitation by international organisations or non-governmental organisations (NGOs). Children are often used in the development of the product or delivery of the service, such as carpet weaving. The product or components of the product are made in countries where there is a high risk of labour exploitation reported by international organisations or NGOs. The services are provided in countries where there is a high risk of labour exploitation reported by international organisations or NGOs. The product is made from materials or using services reported to involve a high risk of labour exploitation by international organisations or NGOs. |
| | Cleaning & janitorial | |
| | Travel and Accommodation | |
| | Cleaning & janitorial services | |
| | Security Services | |
| | Building maintenance and repair services | |

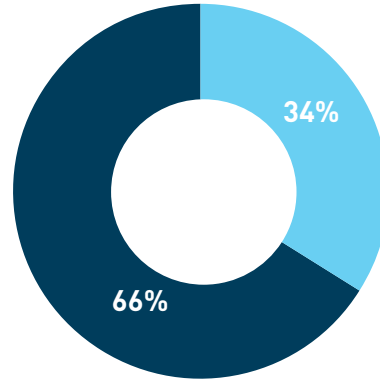
HIGH RISK EXPENDITURE - AUSTRALIA

HIGH RISK CORPORATE EXPENDITURE



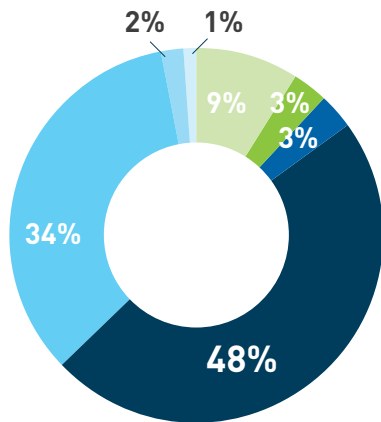
- All other expenditure
- High Risk

HIGH RISK PROPERTY EXPENDITURE



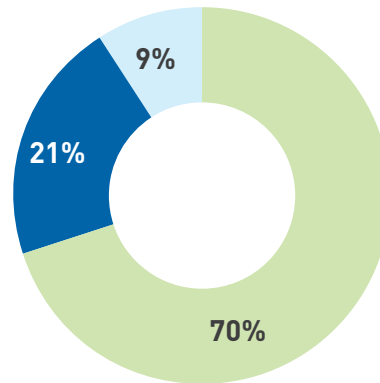
- All other expenditure
- High Risk

HIGH RISK CORPORATE EXPENDITURE BY INDUSTRY



- IT Equipment & Services
- Office Supplies
- Restaurants and catering
- Security Services
- Building maintenance and repair services
- Cleaning & Janitorial Services
- Telecommunications

HIGH RISK PROPERTY EXPENDITURE BY INDUSTRY



- IT Equipment & Services
- Office Supplies
- Restaurants and catering
- Security Services
- Building maintenance and repair services
- Cleaning & Janitorial Services
- Telecommunications

5. OUR ACTIONS TO IDENTIFY, ASSESS AND ADDRESS OUR MODERN SLAVERY RISKS

The UN Guiding Principles on Business and Human Rights (Principles 15 to 18) recommend that businesses make certain commitments and implement processes to advance and protect human rights. Cromwell's response to each recommendation is described below.

A policy commitment to meet our corporate responsibility to respect human rights **Cromwell has a Board endorsed Human Rights Policy that is:**

- Informed by inhouse expertise
- Outlines expectations of personnel and business partners associated with our operations and our supply chains
- Publicly available and communicated to key internal and external stakeholders
- Incorporated throughout all business operations

A human rights due diligence process to identify, prevent, mitigate and account for how human rights impacts are addressed

Human rights due diligence practices are included in our modern slavery risk assessment. This assessment aligns with Cromwell's Group Procurement Policy to include human rights impacts where relevant to:

- Assess actual and potential impacts
- Integrate action upon findings
- Track responses
- Communicate how impacts are addressed
- Vary with complexity with respect to the size, severity, nature and context of its operations
- Recognise the human rights risks which change over time as operations evolve

A process to enable the remediation of adverse human rights impacts we have caused or contributed to

- Issues are considered on a case by case basis integrated as part of our Group People and Governance policies. Matters are referred to those having the relevant delegated responsibility e.g. under the Whistleblower Policy or the Enterprise Risk Management Framework. ,
- Matters can be identified in a number of ways including via email, phone, lodging an incident report under the Enterprise Risk Management Framework, using our whistleblowing reporting mechanisms or through WHS incident lodgement.

5.0 OUR OPERATIONS

The risk assessment of our operations in FY20 remains applicable during FY21, as there are no changes to locations of operation, or business practises which would increase our inherent exposure.

We conducted a high level risk assessment of our operations, applying the inherent risk metrics in this section 5 to identify and assess the risk of modern slavery within our operations. On this basis, as shown in Figure 3, our corporate operations are consistently considered low risk in the countries in which we operate and no instances of modern slavery have, so far, been identified. However, we recognise the existence of the following risks when recruiting and managing staff in our corporate operations:

Risks

1. Inadequate due diligence when appointing and/or monitoring activities of recruitment agencies, increasing risk of deceptive recruitment practices.
2. Inappropriate reliance on the use of unskilled or temporary labour.
3. Ineffective training, reducing the effectiveness of policies, procedures and controls to manage risk of exploitation.
4. Inadequate grievance mechanisms, reducing identification of breaches to enable remediation.

To address these risks, Cromwell has implemented controls and due diligence activities both in the recruitment process and ongoing employment of staff, including:

| | FY21 Status |
|--------------------------------------|--|
| Recruitment Services | <ul style="list-style-type: none"> • Maintaining exclusive partnerships with reputable recruiters • Obtaining acknowledgement of Cromwell's Supplier Code of Conduct prior to engaging with any external recruiter • Ensuring all candidates are capable of interpreting the terms and conditions of employment • Conducting all necessary searches to ensure personnel are legally entitled to work in the region |
| Temporary or unskilled labour | <ul style="list-style-type: none"> • Temporary staff are appointed directly through agencies and considered for permanent positions where appropriate • Interns are all paid on award rates and no unpaid work experience is permitted, unless in accordance with an established agreement between Cromwell and a tertiary provider |
| Training & Awareness | <ul style="list-style-type: none"> • All new staff receive modern slavery awareness training as part of the induction process • All new staff receive information relating to our whistleblowing policies and modern slavery grievance mechanisms as part of the induction process • All staff inductions include an overview of the rights and entitlements of staff and where to obtain further information and support, including access to Cromwell's Employee Assistance Program provider, Assure Programs • Mandatory ongoing training is included in annual governance training |
| Remediation & Grievance | <p>Remediation of harm (if required) is addressed through relevant People and Governance policies. This includes formal investigations in accordance with the Whistleblowing Protection Policy and formal assessment, investigation and rectification of matters reported under our Enterprise Risk Management Framework. Cromwell will continue to follow best practice recommendations for both remediation processes and grievance mechanisms.</p> |

5.1 SUPPLY CHAINS

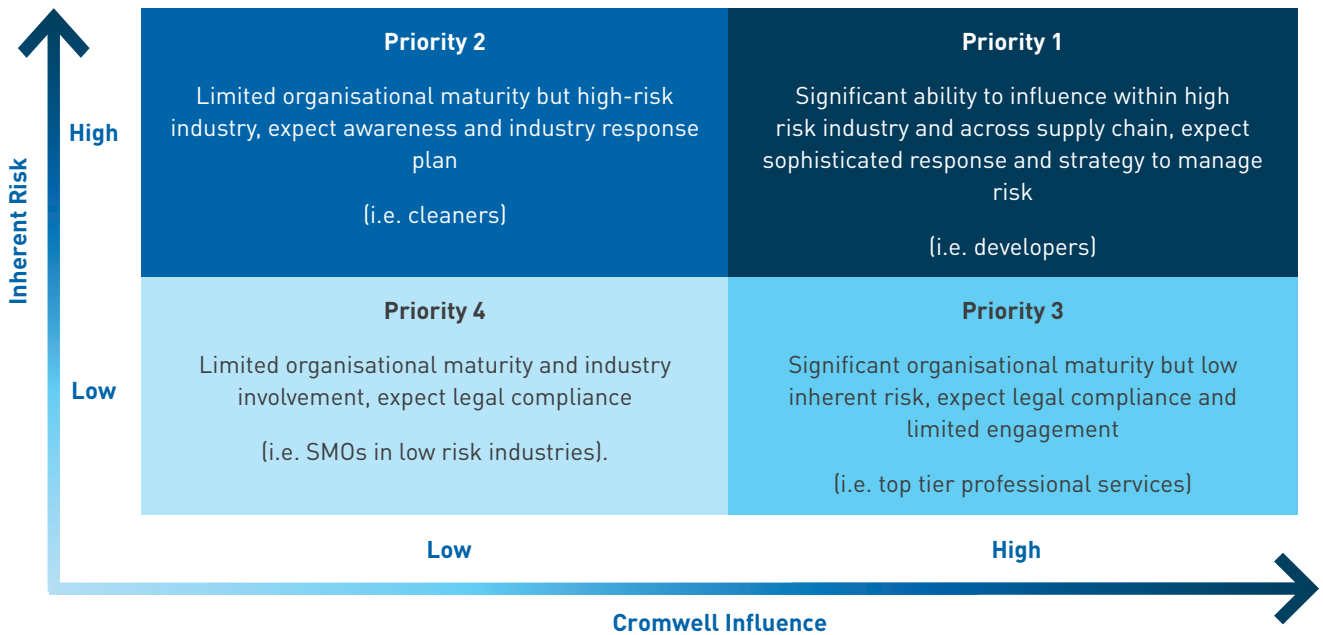
5.1.1 Risk Assessment Methodology

Cromwell's approach to supplier due diligence is informed by the UN Guiding Principles on Business and Human Rights, Principle 14 of which stipulates:

'The responsibility of business enterprises to respect human rights applies to all enterprises regardless of their size, sector, operational context, ownership and structure. Nevertheless, the scale and complexity of the means through which enterprises meet that responsibility may vary according to these factors and with the severity of the enterprise's adverse human rights impacts.' (Guiding Principles on Business and Human Rights)

Our FY20 statement described how we designed a new procurement process aimed at categorising a supplier into 1 of 4 tiers based on the inherent risk of modern slavery, compared to Cromwell's capacity to influence the engagement (Figure 6 - Vendor Risk Assessment). Cromwell's capacity to influence is determined not only by the transactional expense, but also the term and frequency of engagement.

Figure 6 - Vendor Risk Assessment

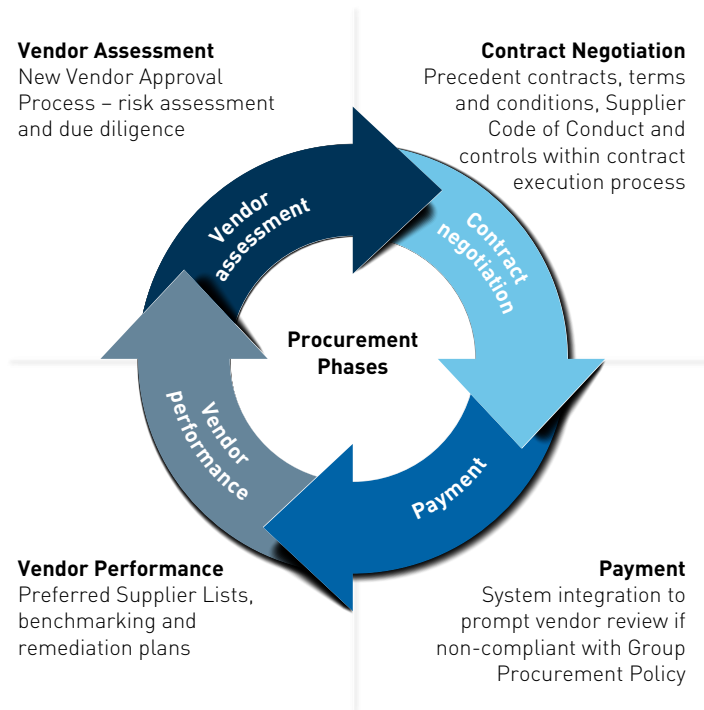


Our assessment considered the presence of modern slavery risk indicators associated with the provision of goods and services was considered across over 270 categories. Sources considered included:

- Sector and industry risks caused because of characteristics, products and processes;
- Products and service risks caused by the way they are produced, provided or used;
- Geographic risks caused by poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty; and
- Entity risks due to poor management, processes and records of human rights violations.

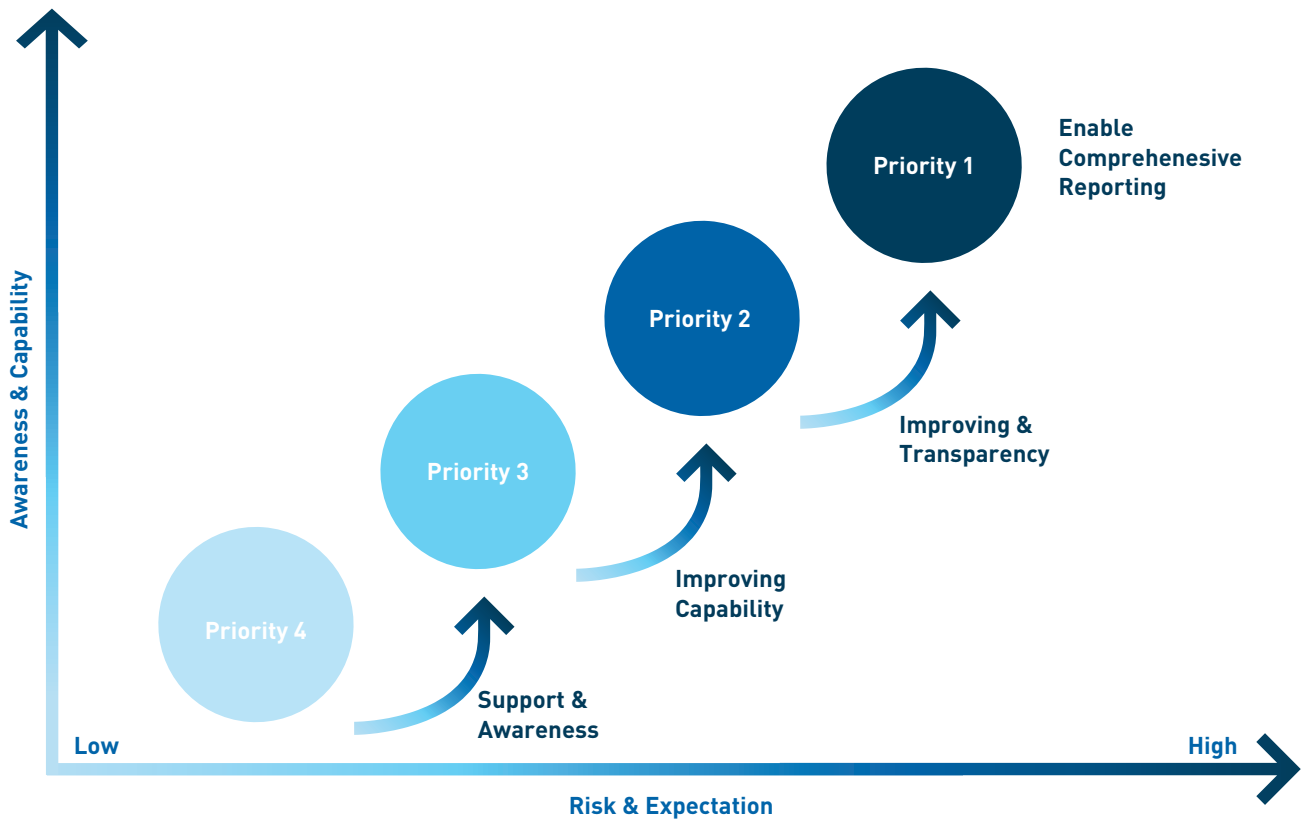
Our FY20 risk assessment has been integrated into the new supplier due diligence process outlined in the Group Procurement Policy, which was developed over the course of FY20 and formally launched across the Group in FY21.

The policy specifies the requirements of suppliers and expectations of staff in investigating, mitigating and managing the risks of modern slavery in our supply chain and integrates controls within business-critical systems and processes throughout the procurement lifecycle.



5.1.2 Due Diligence – Supplier Questionnaires

By prioritising suppliers based on industry, expenditure and capacity to influence the supply chain, resources are focused on where they can add most value. As the inherent risk and capacity to influence increase, so does Cromwell's expectation of suppliers to complete comprehensive enquiries into their own supply chain practices.



To support suppliers outside of the high-risk range, Cromwell has developed a modern slavery questionnaire to increase awareness and capacity building prior to formal engagement with a more comprehensive platform. The modern slavery questionnaire assesses the following criteria:

- General understanding of the concept and risks of modern slavery and human rights
- Current approach to supply chain management
- Supplier details including subcontracting and use of foreign labour in operations
- Recruitment practices
- Worker dialogue
- Education, training and partnerships

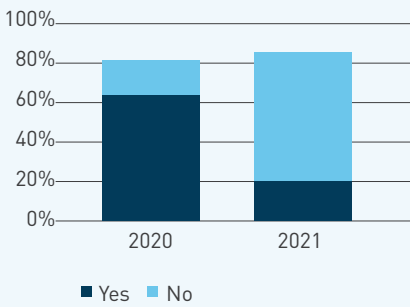
- Policies and procedures
- Level of engagement and supply chain visibility
- Performance, remediation and effectiveness

The questionnaire is included for distribution to prospective suppliers as part of the due diligence process and results inform the ongoing monitoring and engagement. An example of the responses for the FY21 period are shown in Figure 7 below.

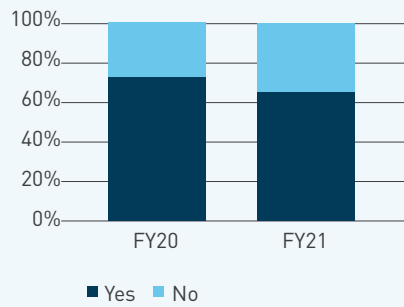
Since the Covid-19 pandemic, media attention and reporting to NGOs about modern slavery occurrences appears to have dropped considerably. This is based on the level of engagement and awareness within the FY21 supplier vendors as indicated below.

Figure 7 – Supplier questionnaire responses extract

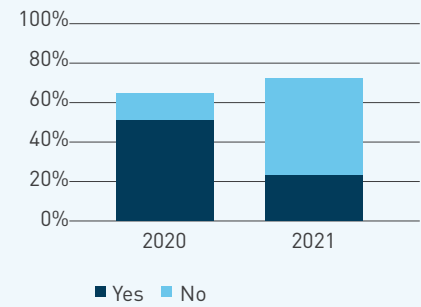
Has your organisation completed a comprehensive modern slavery risk assessment or questionnaire within the past 12 months?



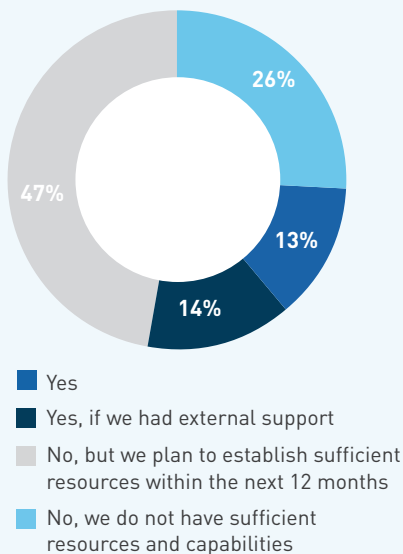
Does your organisation provide any training to employees or suppliers around the topic of human rights and modern slavery?



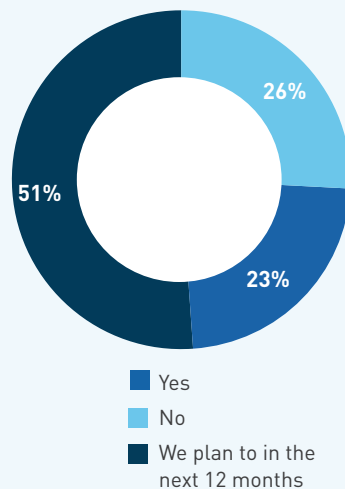
Does your organisation engage with your suppliers on human rights and modern slavery?



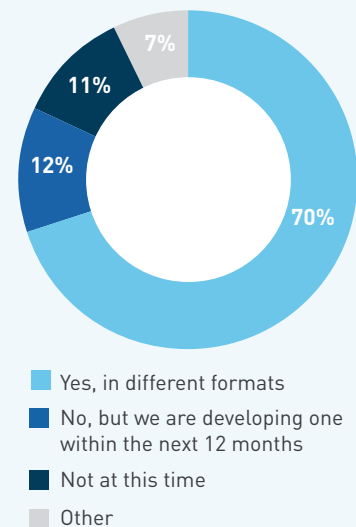
Do suppliers have sufficient internal resources and capabilities to develop a remediation process, or implement a process for remediation once established, in the event that a human rights incident or modern slavery is discovered in their supply chain?



Does your organisation provide any training to employees or suppliers around the topic of human rights and modern slavery?



Do organisations have a grievance mechanism or process in place that provides an opportunity for employees, suppliers and the 'voice of the worker' to be heard?



5.1.3 Supplier Platform – Industry Involvement and Collaboration

The economic and cultural complexities of ethical sourcing are extensive. A collective and ongoing industry effort is critical to support the transition from a reliance on forced labour in high-risk regions without increasing the risk of harm to vulnerable existing workers.

As reported in our FY20 statement, Cromwell was 1 of 15 founding members of the PCA who developed the PCA's Modern Slavery Supplier Platform. The collaboration allows platform partners to assess and report on their supply chain networks through a single online supplier evaluation tool that collects, compares and enables access to data on all suppliers. This ensures consistency across the industry, streamlines the reporting process, reduces the reporting burden and makes it easier for suppliers to share information with leading property organisations.

Since its launch in FY20, membership of the PCA's Supply Chain Database Partners has grown from 15 to 37 participating organisations, with nearly 4,500 suppliers engaged as at 30 June 2021.

During FY 2021 the Supplier Platform has worked with Informed 365 and Bureau Veritas to undertake independent, third-party reviews of the assessment responses provided by suppliers, with the findings assisting the platform partners to identify industry trends and remediation opportunities.

Focus areas for FY22 include grievance mechanisms and remediation, supplier engagement and education, and continuous improvement across supply chains and through reporting.

FY20 Summary

Launched the PCA Modern Slavery Supplier Database

FY21 Updates

Bureau Veritas Audits

FY22 Objectives

Support Industry Research
Grievance Working Group

5.1.4 Remediation and Grievance

Cromwell intends prioritising consideration of the barriers to adequate remediation in FY22, following feedback on our existing practises from independent advisors in FY21. When reviewing our various reporting channels, we will consider if there are any practical and procedural issues which may adversely impact complainants. Barriers could include language, physical location, cost, time, literacy and fear of reprisal.

We recognise the need for transparent and accessible grievance mechanisms which support stakeholders and in line with best practice, we ensure that remediation measures are:

- Based on engagement, dialogue and mediation
- Legitimate, accessible and easy to understand
- Safe and predictable
- Equitable and transparent
- Rights-compatible and focused on continuous improvement

No instances of modern slavery have been identified in connection with our suppliers to date. Where modern slavery practices are identified, Cromwell will engage directly with NGOs, regulators and government to establish the appropriate remedial action, considering the nature and severity of the practices.

In Australia, Cromwell and its employees are prohibited under the *Fair Work Act 2009* (Cth) from taking adverse action against employees or contractors because they exercised or propose to exercise any workplace rights. *The Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019* (Cth) extends the protections available to eligible whistleblowers under the *Corporations Act 2001* (Cth) to include suppliers of goods and services of regulated entities. Cromwell supports the principles of this Act across the jurisdictions under which we operate.

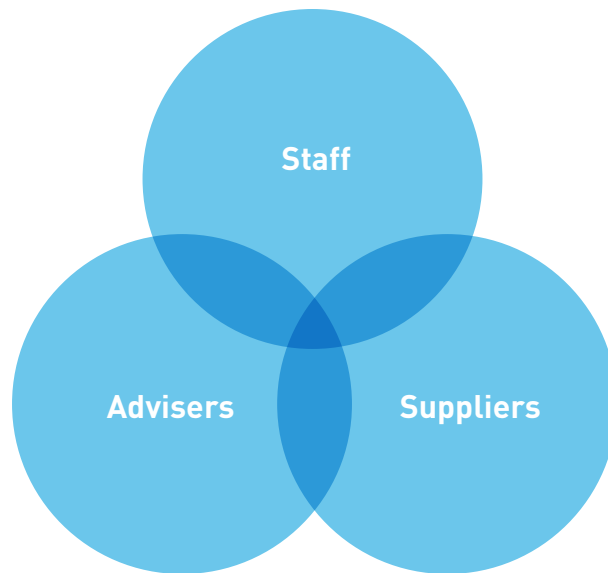
6. HOW WE ASSESS OUR MODERN SLAVERY RESPONSE

6.0 MEASURING EFFECTIVENESS OF OUR ACTIONS

In assessing the effectiveness of our response, Cromwell recognises the specific challenges that may be faced by indigenous peoples, women, national or ethnic minorities, religious and linguistic minorities, children, persons with disabilities and migrant workers. We will continue to engage with researchers and subject matter experts to ensure that the remediation measures are appropriate for the above, having regard to the specific industry and category of vulnerable persons. This process will be further refined in FY22, having committed to the work outlined in section 5.1.4 during FY21.

6.0.1 Performance Indicators

The effectiveness of our actions will be based on both qualitative and quantitative indicators and any evaluation will involve consultation from relevant internal and external stakeholders.



Qualitative

- Supplier engagement (Section 4.2)
- Staff feedback at working groups
- Consultants and industry peer feedback
- NGO feedback

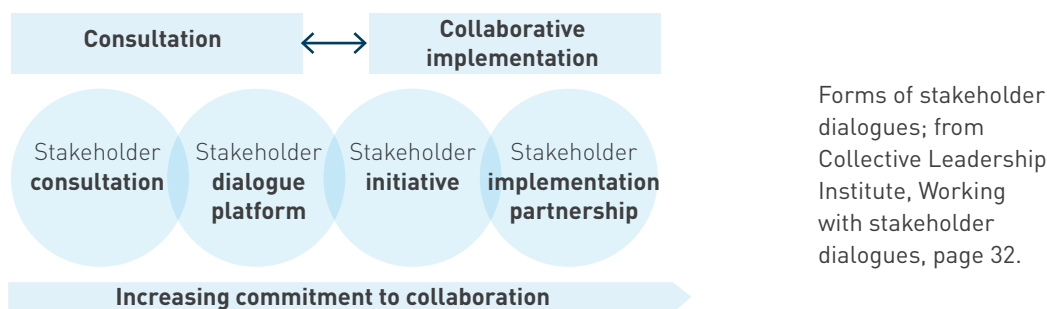
Quantitative

- Participation in training
- Non-conformance rates
- Increase in performance against peer benchmark

Specific targets and objectives against these metrics will be determined on an annual basis and incorporated within our sustainability framework as outlined in Section 6.0.3.

6.0.2 The importance of vendor engagement: Discussion with Lewcon Air – A Case Study

| | |
|--------------------------------------|--|
| Parties | Lewcon Air Conditioning & Cromwell Property Group |
| About Lewcon Air Conditioning | <p>Lewcon Air Conditioning Pty Ltd is an Australian, privately owned company who specialises in the design, supply, installation, service and maintenance of commercial and industrial air conditioning systems.</p> <p>Based on information provided by Lewcon, the company was established in 2004 in Sydney, and with its continued growth now services beyond the Sydney CBD to most of NSW and the ACT. The company plans and designs air conditioning systems for a range of uses and building spaces with efficiency in mind.</p> <p>Founded on a strong customer service base, the team is committed to achieving excellence through development of industry expertise and a strong customer service approach. Lewcon's technicians work closely with clients to identify specific requirements of their business.</p> |
| Inherent Risks Assessed | Design, supply and installation of Air-Conditioning |
| Background | Lewcon Air Conditioning Pty Ltd were invited to participate in the beta version of the PCA Database Modern Slavery Platform. Following the initial assessment, they reached out to Cromwell for guidance on how to obtain resources to increase their response to managing modern slavery risks. |



How did your involvement with the platform help you to understand your exposure to the risks of modern slavery in your operations and supply chains?

- The links to additional resources helped us to upskill staff and increase our awareness of risk indicators which may be present in our supply chains. The process gave us a better understanding of what questions to start to ask our suppliers to get insight into how they are managing the risks within their operations.

How has the experience changed the way you manage your operations and supply chains?

- Modern slavery training has been scheduled for staff and responsibility for managing a response has been specifically assigned to the office manager.
- The majority of our suppliers are major manufacturers, with existing modern slavery reporting obligations. We can now develop a strategy to review the statements of our partners and to begin to map our supply chain.

What advice would you provide to SMEs who are wanting to increase their understanding or response to managing the risks of modern slavery in their operations and supply chains?

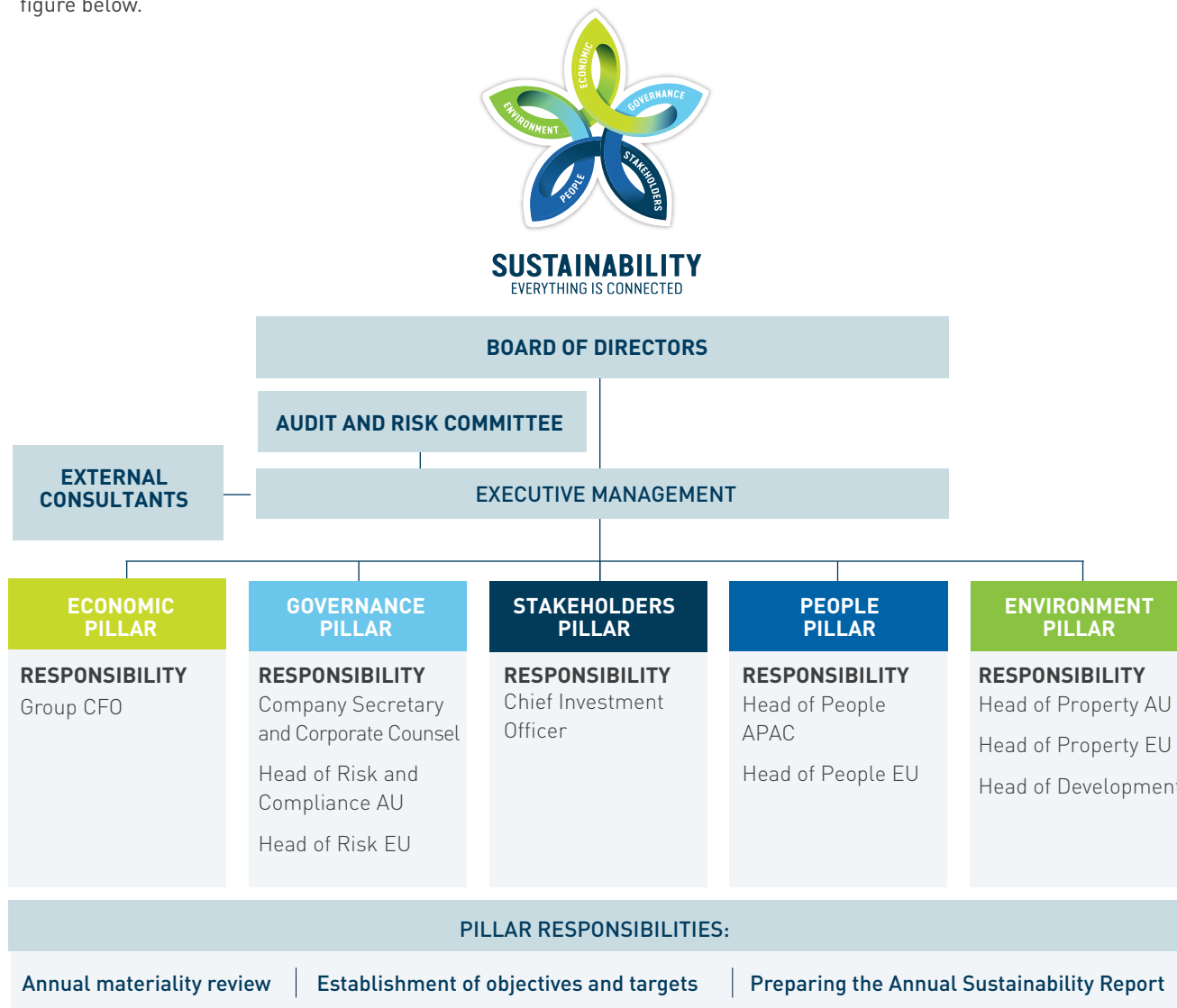
- Don't rush the process. It's about meaningful discussions and quality engagements not the quantity of data collected.
- Liaise with your corporate partners to develop a phased approach based on the opportunities most applicable to your industry, operations and supply chains.
- Focus on embedding the right culture with your staff and integrating your response into existing business processes.

How can principles help assist contractors to manage the risks of modern slavery?

- Understanding it's not a '1 size fits all' approach.
- Working with industry peers to streamline the due diligence process to ensure that resources can be focused on improving business practises.

6.0.3 Sustainability Framework

Our business' focus to date has been in establishing due diligence systems to identify, assess and address our business' risks of modern slavery. Cromwell's sustainability framework is overseen by the Audit & Risk Committee, as shown in the figure below.



The framework provides the foundation for effective supply chain and operational risk management by setting ongoing objectives which align with the principles of sustainable procurement and operations as shown in the table below in section 6.1. This ensures:

- Legislative obligations are observed and maintained as regionally required in accordance with our Enterprise Risk Management Framework;
- Consultants are engaged as required to support compliance and provide advice on continuous improvements;
- Integrated and transparent risk management;
- Testing of adherence to established processes for all functions;

- Reviewing documentation and processes on a regular basis;
- Designing processes to meet industry accepted or best practice;
- Maintaining appropriate insurance coverage; and
- Appropriate internal and external resources to conduct audits and review processes with a focus on risk management and continuous improvement.

The policies and procedures which form part of these objectives collectively demonstrate our approach to ensuring that we act as a transparent, responsible and ethical business.

6.1 THE YEAR AHEAD – FY22 OBJECTIVES

- Continue to develop supplier engagement plans, with consideration to the sphere of influence and industry risks
- Continue to apply procurement best practice to business-critical systems and controls
- Manage adherence to policy expectations and continuous development of the framework to identify, manage and monitor modern slavery risks associated with suppliers
- Develop a compliance plan to maintain functional independence in the internal review of key procurement processes
- Develop a review process for risk assessment of Tier 1 supplier categorisations
- Continue to support and develop staff skills in both identifying potential modern slavery issues within the supply chain, and adhering to the Group Procurement Policy and its processes
- Maintain connections with the Property Council of Australia, industry experts and peers to continue to develop a comprehensive understanding of similar or shared supply chains issues and strategies to deal with them
- Use ISO 20400: Sustainable Procurement – Guidance topics as a guide to mature our approach to managing modern slavery risk over time, including those referred to in the table below:

| ISO20400 TOPIC | OBJECTIVE |
|--|---|
| Accountability & Transparency | Develop compliance plan per ISO standard to maintain functional independence and continuous improvement insights |
| Respect for the Rule of Law | Integration of broader third-party verification and monitoring which support the MSA and may provide preliminary trigger warnings |
| Ethical Behaviour | Deep dive into remediation measures associated with our high-risk industries in collaboration with Monash & the PCA |
| Fair Operating Practices | Utilise small business identification tool as part of the Payment Times Reporting Scheme to target assistance programmes and increased exposure to covid/supply chain risk |
| Consumer Issue | Seek the independent assessment of our framework through participation in industry recognised benchmarking platforms where possible |
| Respect for Stakeholder Interests | Issue survey/questionnaire re supply chain resilience to critical suppliers |
| Full & Fair Opportunity | Offer training sessions to key suppliers who are not reporting entities to ensure they are not inadvertently marginalised |
| Prevention of Pollution | Integrate with Cromwell's environmental management system principles where appropriate |
| Sustainable Resource Use | Lifecycle analysis and embodied carbon for capital expenditure works |
| Focus on Needs | Integration with sourcing strategy for central services |
| Analysis of Costs and Benefits | Review of all departmental processes to verify compliance with principle of cost benefit analysis |
| Innovative Solutions | Consider if a tool to assess the performance of our reporting suppliers' statements and prompt escalation of issues noted in those statements or during due diligence is feasible |
| Business Integration | Ensure learning and development strategy aligned with upskilling staff on topics relating to ISO20400 and modern slavery refreshers |
| Labour Practices | Include specific sourcing clauses in construction contracts to deal with supply chain management risks |
| Respect for Human Rights | Integration of modern slavery risks into pandemic response and business continuity programmes where relevant |

7.0 CONCLUSION

Across the Cromwell Property Group, there is a growing awareness of the role and responsibility that Cromwell has to identify modern slavery within our supply chains and operations, and an awareness of our obligations to protect human rights. Implementing the Group Procurement Policy now provides an opportunity to further integrate our compliance and risk management practices to embed and highlight -modern slavery risk .

Our onboarding procedures for staff and suppliers was an essential development in FY21, and continued training of procurement champions through FY22 will provide the business with internal assistance points to ensure that anyone can obtain appropriate guidance when needed. We will continue to assist where required, and continuing the development of our risk assessment of supplier categorisations will provide greater insights into our potential modern slavery risk exposure and inform our ongoing activities.

The Cromwell website provides a comprehensive range of information on the Group, Sustainability Framework and governance practices. The website address in www.cromwellpropertygroup.com.

FURTHER INFORMATION

The Cromwell website provides a comprehensive range of information on the Group, sustainability framework and governance practices: www.cromwellpropertygroup.com.

Requests for further information about the Group and our approach to modern slavery risk, may be directed to:

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