
MERITON MODERN SLAVERY STATEMENT



MERITON

Contents

MERITON MODERN SLAVERY STATEMENT	1
INTRODUCTION	2
COMPANY STRUCTURE, OPERATIONS AND SUPPLY CHAINS	3
CONSULTATION WITH CONTROLLED ENTITIES	5
IDENTIFYING RISKS OF MODERN SLAVERY PRACTICES	6
ACTIONS TAKEN TO ASSESS AND ADDRESS THOSE MODERN SLAVERY RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION	8
ASSESSING THE EFFECTIVENESS OF OUR ACTIONS AND SETTING OUT OUR FUTURE OBJECTIVES	10
KEY HIGHLIGHTS FY23	11
OUR CONSULTATION PROCESS IN PREPARING THIS STATEMENT	12





MERITON MODERN SLAVERY STATEMENT

This Joint Statement has been published in accordance with the Modern Slavery Act 2018 (Cth) (the 'Act') for Meriton Properties Pty Ltd ABN 49 000 698 626, including its subsidiaries ('Company').

It identifies the steps Meriton has undertaken to identify the risks of modern slavery within our supply chain and the actions taken to reduce those risks, for the reporting period ended June 2023 (FY 2022/2023).

INTRODUCTION

Meriton is Australia's largest and most highly acclaimed private residential developer, with more than 80,000 apartments across NSW, QLD, ACT and VIC. Established in 1963, Meriton has made a significant impact on the Australian residential development landscape with some of the tallest residential towers across the East Coast of Australia. Meriton's retail leasing portfolio spans major economic zones, contributing to the areas' economic growth and future employment opportunities.

Meriton offers sales, leasing, property management services and property finance as well as the luxury accommodation brand Meriton Suites. Each apartment development represents an evolutionary step forward in quality and design, driven by Meriton's profound understanding of the way people want to live. This 360-degree, fully integrated approach to our development projects drives financial, community and lifestyle benefits for the long-term.



COMPANY STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Our full range of services include:

- Property Development** 

Our in-house team has been developing the very best in apartment living for over 5 decades. With this extensive experience, Meriton understands what it takes to provide market-leading development solutions that successfully respond to local environments and capitalise on their prime locations.

Meriton meticulously oversees all parts of the development process including site acquisition, design, construction, sales, marketing and interior design.
- Residential Apartments** 

Meriton customers know exactly what to expect from their property because we consistently deliver a high level of amenity at every single development. Our apartments are designed to make life easier, more comfortable and more convenient, both inside and out. Our seamless integration of residential apartments, retail and commercial spaces create cutting edge environments in which to live, work and play, with robust connections to surrounding infrastructure.
- Hotel Suites** 

Meriton Suites is Australia's largest owner-operator of hotel rooms with 23 locations across Sydney, Brisbane and the Gold Coast now offering a total of 6,146 suites. This gives every guest a guarantee that they are staying in the best accommodation in Australia. Our hotels are award-winning and have continually been ranked the best in each location on many traveller review websites.
- Retail, Commercial and Childcare** 

Meriton's existing portfolio spans major economic zones such as Sydney CBD, Chatswood CBD, Parramatta CBD and the suburban hubs of Bondi Junction, Mascot, Dee Why, Southport, and the Gold Coast.

Retail is located within major apartment developments which provides access to thousands of apartment tenants and brings high visitor traffic from the popular Meriton Suites. In proximity to residential accommodation, education, and transport hubs, Meriton developments are fully integrated with surrounding communities which makes our retail and commercial spaces highly sustainable.
- Property Management and Building Management** 

Meriton boasts Australia's largest privately owned rental portfolio with more than 5,184 apartments owned and managed in-house. Meriton Property Management also manages over 4,277 apartments on behalf of private investors, bringing our entire property portfolio to a total of over 9,461 apartments across more than 79 development sites around Australia.
- Property Finance** 

For over 50 years, Meriton has helped thousands of Australians secure their dream home through Meriton Property Finance. At Meriton we are able to assist clients in purchasing a Meriton apartment by offering a low-cost mortgage loan.



As a property developer, owner and manager of a diverse asset portfolio, Meriton's procurement spend is therefore predominantly related to the supply of goods and services relevant to the built environment, including but not limited to:

• Head Office



- Information Communication & Technology service providers
- Professional services functions including accounting, auditing, legal, tax, and insurance
- Cleaning and security contractors
- Branded promotional merchandise suppliers

• Construction



- Subcontractors & subsequent consultants involved within construction activities pertaining to preliminaries, design, early works, structure, services, facades, internal finishes & fit-out, external works
- Manufacturers and suppliers of plant & equipment, materials inclusive of logistics
- External labour hire and traffic management resourcing
- Work uniforms and ancillary Personal Protective Equipment suppliers

• Sales



- Property agents
- Branded promotional merchandise suppliers

• Building Management



- Cleaning, maintenance and security contractors

• Serviced Apartments



- Housekeeping, cleaning and security service providers
- Laundry and linen providers
- Furniture, fixtures and equipment suppliers
- Consumable goods suppliers
- Corporate partners and online travel agents



CONSULTATION WITH CONTROLLED ENTITIES

Meriton lodges on an annual basis the audited consolidated accounts for Meriton Properties Pty Ltd which includes all its subsidiaries and each of the reporting entities under this Joint Statement, pursuant to s 14 of the Act.

All Meriton entities are classified as private entities, all registered at Level 11, 528 Kent Street, Sydney NSW 2000 ('Head Office'). At 30 June 2023, the following three of the six reporting entities submitting this Joint Statement, employed a total of 1094 staff:

- Meriton Property Services Pty Limited is the operational arm of Meriton and subsidiary of Meriton Properties Pty Ltd, employing 889 staff based at Meriton's Sydney Head Office and at Meriton Suites.
- Karimbla Constructions Services (NSW) Pty Limited and Karimbla Constructions Services (QLD) Pty Limited employs 205 construction staff that work on various construction sites nationally.

The remaining Karimbla Properties entities are special purpose vehicles, for the purpose of acquiring development assets and do not employ staff or have supply chains limiting the risk profile and consultation necessary for the purpose of this Joint Statement.

Our staff are employed in planning, architecture, design, construction, finance, sales and marketing, customer service, property and building management, and other business operations roles. Head Office staff under Meriton Property Services Pty Limited, are employed to support the business functions across each Meriton reporting entity. This includes the shared Human Resources, In-House Legal, Contracts, Project Management, Marketing and Finance key resources. Consultation with each reporting entity is therefore streamlined as all relevant staff are based in the Head Office and directly involved in any supply chains.

IDENTIFYING RISKS OF MODERN SLAVERY PRACTICES

As part of its long-term strategy, Meriton is committed to building on existing policies and procedures and to continuously improving its strategies associated with addressing modern slavery risks, including activity potentially contributing to forced or child labour, human trafficking, debt bondage slavery, servitude, forced marriage, exploitation and/or aiding, abetting, counselling or procuring any of the above offences.

A cross functional working group was established with an objective to identify the risks of modern slavery within our supply chain, and to develop the processes and procedures required to reduce this risk. Members of the working group were employed within Meriton's corporate function during the reporting period. Therefore, all items detailed within this statement are applicable across all entities; from the initial risk-scoping exercise conducted with the assistance of external partners, to the supply chain assessment and subsequent risk-reduction policies and procedures.

Meriton's response to modern slavery risk assessment and mitigation across its group of companies is managed by its leadership team, supported by the Office of the General Counsel, and is reported to the Board.

Assessing the level of risk associated with a product, service and/or individual supplier is important in creating an effective supplier engagement program. Meriton has implemented a risk-based approach to supplier management. This approach is similar to the approach taken by large organisations who have many suppliers and complex supply chains, providing a practical way to filter through a large volume of suppliers and prioritise those which present the greatest risk. Meriton has identified and reviewed the following specific risks of modern slavery within its business and supply chain:

- Risks through indirect arrangements via its supply chain (that is, third-party suppliers).
- Labour practices, working conditions or exploitation used by external providers either within Australia or internationally. This includes:
 - Forced labour: restrictions of movement, intimidation, threats, including human trafficking.
 - Debt bondage: the payment of excessive recruitment fees or associated costs, and retention of identity documents.
 - Deceptive recruiting for labour: workers falsely promised certain jobs, benefits or conditions.
- Geographical risks – Countries may have higher risks of modern slavery occurring and as such have been categorised as per the following regions; Australia, Asia/Pacific, America, Middle East, Europe, Africa.
- Trade risk – Certain industries may pose a greater risk than others. Example, steel manufacturing, upholstery, ceramic tiling, glazing etc.



Meriton's staff are employed directly, lowering the risk of modern slavery within our core team. The highest risk services within the operations of our assets are those where Meriton has less direct visibility and control over the workers and their employment terms. This includes third-party contracting on our developments and assets, including labour, security, cleaning, landscape, maintenance and waste contractors.

Meriton predominantly deals with Australian based suppliers, with the majority of Meriton's operations based in Australia, which is considered low risk for modern slavery. We note, however, that our suppliers have their own complex and diverse supply chains that may extend beyond Australian borders.

The construction and hospitality industries in particular have been identified as high-risk industries due to the prevalence of migrant labour and labour hire agencies within its outsourced workforces, as well as the possibility of non-ethical sourcing and environmental impacts of goods and materials imported from high-risk countries.

Meriton therefore acknowledges that there may be risks of modern slavery practices inadvertently occurring in our extended supply chains. However, we believe our mitigation processes set out in this statement combats this risk.



ACTIONS TAKEN TO ASSESS AND ADDRESS THOSE MODERN SLAVERY RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION

At its Head Office where all operations occur, Meriton has established a collaborative cross-functional modern slavery committee ('Modern Slavery Committee') to allow for knowledgeable and open dialogue to be disseminated between various operational entities, on a quarterly basis. The Modern Slavery Committee's objectives, on behalf of Meriton, are to identify, assess and address issues to combat and mitigate risks associated with modern slavery through Meriton's business undertakings.

Meriton's commitment to address the risk of modern slavery in its operations and supply chain is put into action by taking the following steps:

- Screening of incoming suppliers and contractors which includes requirement for statutory declarations on modern slavery compliance.
- Reviewing and updating Meriton's contractual obligations in relation to all operations including requiring warranties as to compliance with the Act, including but not limited to the following contracts:
 - Subcontractor agreements
 - Scope of Works
 - Consultant agreements
 - Cleaning and Security agreements
 - Purchase and supply agreements
- Reviewing and including modern slavery policies within its contracts which includes a requirement for these policies to be signed off by any contracted supply chains.
- Setting up grievance mechanisms, discussed in more detail below.
- Implementing measures to ensure suppliers adhere to codes of conduct (such as periodic audits).
- Checking risk assessment processes regularly to ensure they are up to date.

Screening on incoming suppliers and contractors:

Meriton has (previously) contributed with the Property Council of Australia's (PCA) Modern Slavery Working Group, in developing a Supply Chain Assessment Questionnaire. In FY23, Meriton developed an in-house assessment tool to improve the screening of its supply chain across all related entities. This new tool titled "Modern Slavery Supplier Assessment", is designed to allow Meriton to objectively assess current and new Supply Chain providers, through the provision of a Risk rating, based on each organisation Modern Slavery Risk exposure.

The Supply Chain Assessment Questionnaire includes 16 assessment points, broken up into 4 sections, as set out below:

- i. Supplier details
- ii. Organisational Structure
- iii. Supply Chain Details
- iv. (Modern Slavery) Response Process

Meriton's internal risk team has reviewed the current list of suppliers, and identified those posing a higher risk of modern slavery. Each identified supplier is to be issued Meriton's "Modern Slavery



Supplier Assessment” questionnaire and requested to submit their response. Each received response will be assessed by Meriton using the assessment scoring scale to determine the level of risk (High, Moderate or Low). A Corrective Action Plan will be developed and issued to Suppliers determined to have a High Risk of Modern Slavery. Additionally, Meriton will directly engage with High Risk suppliers to include education on the risks of modern slavery, to demonstrate a deeper awareness of their own supply chain liabilities.

The abovementioned process is ongoing and an inherent part of Meriton’s mitigation strategy for addressing Modern Slavery Risks.

Setting up grievance mechanisms:

Meriton has in place comprehensive set of policies and procedures to articulate our values, ways of working and expectations of employees and suppliers. These policies are an integral aspect of Meriton’s commitment to managing human rights, including:

- Modern Slavery Policy:
 - sets out Meriton’s commitment to assessing and addressing potential modern slavery risks, including due diligence and remediation mechanisms
- Whistleblower Policy:
 - supports and reflects Meriton’s values and code of conduct
 - sets out procedures and avenues available to report unethical, corrupt, illegal or otherwise inappropriate conduct
 - ensures disclosures of wrongdoing are dealt with appropriately and promptly
- Work, Health and Safety Policy:
 - maintains safe working conditions for all team members, contractors and subcontractors
- Trade Practices and Compliance Policy:
 - ensures that all of Meriton’s business practices and marketing, promotional and sales activities are in full compliance with trade practices and laws in force

- Bullying and Harassment Policy:
 - prohibits workplace bullying, harassment or discrimination in any form
- Grievance Policy:
 - ensures complaints are handled promptly, systematically, and with fairness and transparency
- Recruitment and Selection Policy:
 - ensures Meriton’s recruitment and selection processes encourage equal employment opportunity and diversity
- Anti-Corruption and Bribery Policy:
 - prohibits any activities associated with corruption or bribery

The commitments we make in these policies apply to all employees of Meriton at all levels and our consultants, contractors, subcontractors, suppliers and their employees. An offence under the Commonwealth law, including the Act, is defined as a disclosable matter under these policies. Each disclosure received is investigated and reported to the respective Executive Management Team.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS AND SETTING OUT OUR FUTURE OBJECTIVES

We will endeavour to continuously improve our approach to managing modern slavery within our supply chain and to embed any lessons learnt into our existing process. As is essential for continuous growth and learning, Meriton has established a suite of responses to assess the effectiveness of the actions that are being implemented.

We have issued our updated contract suite to all subcontractors, consultants and suppliers. Meriton has invested in training with senior management including directors, compliance and the in-house legal team. As we progress through FY24, Meriton will continue to work collaboratively with its peers to understand what can be done better to improve processes moving forward.

Key focus areas to be addressed by the Modern Slavery Committee, are:

- Further development of supply chain data metrics and geographical mapping risks.
- Refinement of internal corporate policies.
- Liaison with operation and the supply chain to ensure commitment to the Act.
- Regular monitoring and reporting on progress.

In the reporting period ending FY23, Meriton's risk assessments were focused on suppliers that it had a direct contract with, updating its contracts to include modern slavery provisions and developing its policies and procedures in relation to modern slavery. In FY24 we will continue to build on the work of FY23 and continue to review and update our policies and procedures relating to modern slavery to ensure that they are effective in reducing the risk of modern slavery, as relevant to our employees and also our suppliers. We will also continue to screen new contractors to identify risk and develop further mitigation strategies to minimise risk.



KEY HIGHLIGHTS FY23

- Established a modern slavery working group to closely monitor risk and develop further strategies to reduce risk.
- Delivered modern slavery training to employees.
- Updated contracts to include modern slavery requirements/obligations on subcontractors (including suppliers).
- Screening incoming suppliers to identify high risk suppliers and updated actions/strategy to minimise risks of modern slavery.

Our complete list of our further targeted actions as follows:

Item	Targeted action
Policy review	Continue to monitor and review the current policy framework to ensure it meets best practice.
Re-assessment of key risks	Continue to review our risk assessment to ensure that we are continuing to target high risk elements of our supply chain. Review the high-risk supplier and contractor categories to better understand the volume and scope of business within these categories and conduct further due diligence to mitigate identified risks.
Process and procedure review	Review existing processes and procedures to ensure their efficacy, and to identify opportunities to improve. This includes the consideration of a supplier pre-qualification system, adapting accounting software to consolidate supplier data and identifying opportunities to inform the tender process.
Training	Continue to communicate the risks of modern slavery and the relevant procedures to staff and contractors.
Engagement	Engage with suppliers to ensure they understand their requirements and assist them through the processes to build capabilities.
Collaboration	Continue to work with industry peers, and other organisations to share learnings and build capabilities.
Assurance and Effectiveness	Build on our review of the current assurance process to ensure it meets best practice. Further develop mechanisms to assess the effectiveness of actions undertaken.



OUR CONSULTATION PROCESS IN PREPARING THIS STATEMENT

Meriton Properties Pty Ltd and its subsidiaries have the same five (5) directors, Mr Harry Triguboff AO, Mr Bradley Goodman, Mr James Sialepis, Mr Matthew Thomas and Mr Albert Chan. The directors are directly involved in the consultation and implementation of this statement.

As stated above, Meriton maintains a consistent leadership team across each of its reporting entities and all subsidiaries, and there is therefore one management team responsible for the above processes. This statement is a product of the Modern Slavery Committee, and its preparation has been managed via consultation and input from committee members and directors.

This statement was approved by the Board of Directors, and under consultation with all Meriton directors on 11 October 2023.

MR HARRY TRIGUBOFF AO

Managing Director,
Meriton Properties Pty Ltd
18 October 2023





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