

SHL MODERN SLAVERY STATEMENT

30 June 2021

This is SHL's first modern slavery statement pursuant to the Modern Slavery Act 2018 (Cth) and is for the reporting period 1 July 2020 to 30 June 2021.

This statement was approved by the Board of SHL Development Pty Ltd and its subsidiaries on 31 March 2022.

1. Identify the Reporting Entity

Reporting Entries –SHL Development Pty Ltd (ACN 129 707 035) is the head company of the SHL Consolidated Group.

2. Describe the reporting entities structure, operations and supply chains

SHL is a Canberra based developer of residential and commercial property with operations in Australia. Major operations of the group include

- Acquisition of land and subsequent development planning
- Residential and commercial real estate construction
- Sales of residential and commercial property

Projects are currently located in the ACT.

Our supply chain can be broken down into the following categories.

- Professional consultants
- Construction trade contractors
- Construction materials
- Labour Hire
- Information Technology
- Media providers/advertising and sales channels

3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

During this reporting period, SHL commenced to review the details of the Modern Slavery Act and analysed our operations and supply chains to identify areas of heightened modern slavery risk as per the relevant guidelines.

Resulting from our initial review, operations relating to planning, design and sales have been assessed as low risk, with shallow and straight forward supply chains mainly located domestically. The professional qualifications associated with many of these areas also reduce the risk profile of these sectors.

This preliminary process revealed the areas with higher risks to be those involved in building and construction, particularly associated with imported goods and raw materials where SHL has

limited visibility over counterparty operations and supply chain practices. Labour hire and unskilled labour trades also present potential risks of forced labour and deceptive practices that require consideration and further assessment.

4. 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

SHL acknowledges the risks associated with Modern Slavery that exist within our supply chain and are committed to reducing their impact by developing certain mitigating procedures and practices.

During the year, SHL began developing suitable methodologies in order to conduct its first modern slavery supply chain review for assessment of the various areas of risk in concern. The review will help to highlight the areas where increased consideration and efforts should be given when monitoring our supply chains and during engagement of suppliers.

Results from this review and assessment will be incorporated into our supplier engagement processes through proper communication with suppliers and our staff. SHL maintains close working relationships with most of our suppliers and service providers. Many suppliers are long term partners with a good degree of mutual trust, however SHL recognises that increased scrutiny should be applied where significant risks are identified.

Apart from the aforesaid working frameworks, in the coming years, SHL is also looking to improve our staff education internally to improve awareness of these issues. We will also be preparing updated policies to incorporate and formalise consideration of modern slavery issues.

5. Describe how the reporting entity assessed the effectiveness of these actions

While it is still in the early phases of developing and implementing suitable strategies in dealing with the modern slavery risks, SHL aims at continuing to work with parties throughout its supply chains in order to minimise any impact of modern slavery. The initial findings from our preliminary reviews and policy drafting have provided us with a more focused direction moving forward for continued improvement. From a governance perspective, SHL has enhanced oversight and understanding of modern slavery risks than at any point to date.

Beyond this, 2021 was a highly disrupted year, with frequent COVID-19 lockdowns and interruptions creating significant impediments to internal training and corporate communication with suppliers. Moving forward, we expect to be able to improve upon these areas when more comprehensive risk assessment results are generated, and relevant policies and procedures are formulated.

6. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls

The reporting entity and controlled entities work closely with common management and oversight. Group policies apply to all entities in the Group, and common oversight is applied to every entities. As a result, the consultation between the group entities is at a very high level, and consistent behaviour is unified within the group.

7. Any other information that the reporting entity, or the entity giving the statement considered relevant

SHL acknowledges the importance of modern slavery risks and will continue to explore the best options available to mitigate the risks within its supply chain. The Group will communicate with our key suppliers of any adopted standard and measures to ensure that modern slavery risks throughout their respective supply chains can also be monitored and managed as well.

SHL Group of Companies



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Managing Director

31 March 2022