

Introduction

This modern slavery statement is prepared by FCCD (Australia) Pty Ltd (**FCCDA**) pursuant to section 13 of the Modern Slavery Act 2018 (Cth) (**Act**) for the period 1 January - 31 December 2024 (**Reporting Period**).

Structure, operations and supply chains

Structure

FCCDA (ACN 134 182 380) is a private company incorporated in Australia with a registered office at Level 19, 1 Macquarie Place, Sydney NSW 2000.

FCCDA has one wholly owned subsidiary, FCCD (Australia) Nominee Pty (**FCCDAN**) (ACN 134 182 657), which acts as security trustee and as trustee for a trust. FCCDAN does not have any assets, revenue, expenses or employees. FCCDA does not own or control any other companies.

FCCDA has entered into a management agreement with Fortress Investment Group (Australia) Pty Ltd (**FIGA**) (ACN 111 940 713). FIGA provides management services to FCCDA, encompassing a broad range of administrative services.

FCCDA is wholly owned by a Delaware limited partnership (**Fund**) managed by an affiliate of Fortress Investment Group LLC (**Fortress**). The Fund opportunistically acquires assets and diversified portfolios of investments primarily throughout the United States, Western Europe and the Pacific region. Its investment programme incorporates complementary investment strategies, focussing on direct lending, corporate debt and securities, portfolios and individual assets, real estate and structured finance.

FIGA is a subsidiary of Fortress. Fortress is a leading, highly diversified global investment manager with approximately US\$49 billion of assets under management as of 31 December 2024. Fortress manages assets across a range of credit and real estate, fixed income and trading, lending, private equity, and permanent capital investment strategies.

Operations

FCCDA operates in the financial sector. Its main business activities involve the provision of secured loans to businesses and commercial enterprises (primarily) in Australia, which can be broadly grouped into the following categories:

- (a) Warehouse (or rediscount) facilities, where FCCDA provides finance to other financial institutions;
- (b) Real estate, construction and development financing; and
- (c) Loans (typically as part of a syndicate) to private equity backed corporate leveraged buyouts.

The FCCDA business is managed by FIGA under a management agreement. FIGA is a private company registered in Australia. FIGA provides FCCDA with operational and administrative services to conduct its business activities.

FCCDA and its subsidiary FCCDAN do not have any employees nor do they have any contracted staff or labour hire arrangements.

Supply chains

FCCDA's direct supplier of products and services is FIGA, which is located in Australia.

As part of managing FCCDA, FIGA procures goods from other suppliers, including office equipment and stationery, IT equipment such as laptops and smartphones, and branded goods such as marketing materials.

In the provision of services to FCCDA, FIGA employs staff and engages external parties for services such as office rental, hospitality and catering, travel and hotels, as well as cleaning services and general office supplies. FIGA also sources certain ancillary functions, such as services from law firms and accounting firms relating to FCCDA's business. The majority of FIGA's suppliers are based in Australia.

Risks of modern slavery practices

In preparing this modern slavery statement, we have considered the risks of FCCDA and FCCDAN causing, contributing to, or being directly linked to modern slavery practices.

We understand from the Attorney-General's Department's guidance for reporting entities (**AGD Guidance**) that:

- risks of *causing* modern slavery practices means the risk that FCCDA's operations may directly result in modern slavery practices;
- risks of *contributing* to modern slavery practices means the risk that FCCDA's acts or omissions in its operations and supply chains may contribute to modern slavery practices; and
- risks of being *directly linked* to modern slavery practices means the risk that FCCDA may, through its operations or services, be connected to modern slavery through the activities of another entity that FCCDA has a business relationship with.¹

Operations

FCCDA considers the risks of it causing, contributing or being directly linked to modern slavery practices through its operations to be low, including for the following reasons:

- FCCDA operates in Australia and does not employ any staff.
- All FIGA staff are permanent staff based in Australia. Australian employment standards apply to FIGA staff.
- FCCDAN does not have any physical operations, assets or employees.
- FCCDA has limited control over the actions of its individual borrowers or loan recipients and acknowledges the AGD Guidance that, in these circumstances, FCCDA is not required to monitor or report on individual borrowers or loan recipients as part of its operations.²
- FCCDA acknowledges that through its financial lending activities, FCCDA could be indirectly linked to modern slavery risks relevant to the construction and building sector in Australia, including deep in the supply chains of its individual borrowers or loan recipients, for example through the preparation of building materials and textiles used in property developments. However, as FCCDA is far removed from these activities, it has limited visibility of these supply

¹ Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities (May 2023), Attorney-General's Department, p40.

² Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities (May 2023), Attorney-General's Department, p34.

chains and limited leverage to influence behaviour so deep within the supply chains of its individual borrowers or loan recipients.

- Pursuant to the management agreement between FCCDA and FIGA, FIGA is responsible for managing FCCDA, including (inter alia) the carrying out of all day to day management, secretarial, accounting, administrative and reporting functions and obligations.

Supply chains

FCCDA's understanding of modern slavery risk in our supply chains is based on the specific operational arrangements of FCCDA, the nature of our industry and the limited extent of our supply chains. FCCDA considers the risks of it causing, contributing or being directly linked to modern slavery practices through its supply chain to be low, including for the following reasons:

- As an investment vehicle, FCCDA's supply chains are relatively limited and primarily concentrated in FIGA as a direct supplier of services to FCCDA.
- As noted above, FIGA provides management services to FCCDA, encompassing a broad range of administrative services. For example, FIGA sources (on behalf of FCCDA) certain ancillary functions, such as services from law firms and accounting firms relating to FCCDA's business. These professional services firms are typically tier 1 legal firms, accounting or other advisory firms that are highly regulated, which we understand assists with mitigating certain modern slavery risks.
- The majority of FIGA's direct suppliers are based in Australia, which we understand mitigates the degree of geographical risk to which FCCDA and FIGA may be exposed.

We understand from the AGD Guidance that certain of the goods and services procured by FIGA in its services to FCCDA may have inherent modern slavery risks, such as the sector and industry risks associated with electronics and the product and services risks associated with cleaning services.³ FIGA procures such goods and services as part of managing FCCDA, and the abovementioned professional services firms are also likely to procure similar goods and services. We acknowledge from the AGD Guidance that there is a risk that an entity in FCCDA's position may be connected to modern slavery practices through the activities of entities in its supply chain, including entities with whom it does not have a direct contractual relationship.⁴

Actions taken to assess and address risks

Actions

As an affiliate of Fortress, FCCDA is subject to a number of global measures as part of Fortress' global commitment to the highest ethical standards of business conduct and to ensure compliance with applicable law and regulation.

For example, all employees managing FCCDA's operations are required to comply with policies and procedures outlined in the global Fortress Compliance Manual, which includes the Fortress Code of Business Conduct and Ethics. Employees are also provided online training on certain compliance policies and receive the full suite of Fortress compliance policies at onboarding.

Further, we believe responsible investing involves incorporating environmental, social, and governance considerations in our investment decision making and asset management process.

³ Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities (May 2023), Attorney-General's Department, p44.

⁴ Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities (May 2023), Attorney-General's Department, p40.

In the Reporting Period covered by this modern slavery statement, Fortress maintained a Credit and Real Estate Funds ESG Policy that acknowledges the importance of assessing relevant ESG risks and issues in evaluating an existing or prospective investment (while also noting that our ability to assess and influence ESG issues in practice will vary significantly by strategy and investment).

Please see <https://www.fortress.com/responsibility> for the current Fortress Credit and Real Estate Funds Responsible Investment Policy, which applies to FCCDA's business activities.

Due diligence

The primary business activities of FCCDA involve financial lending. FCCDA undertakes due diligence across its loans, including to identify the intended use of borrowed funds and to ensure its lending complies with applicable laws. This includes due diligence against applicable anti-money laundering and counter-terrorism financing (AML CTF) requirements.

Funds sourced for FCCDA are subject to applicable 'know your customer' processes and AML CTF regulations. We consider these cross-functional processes to be aligned with assessing and addressing risks relating to modern slavery. For example, these due diligence processes include, among other things, screening investor names against applicable regulatory watch lists and sanctions lists.

FCCDA will not knowingly deal with, support, or purchase goods or services from anyone engaged in modern slavery.

Remediation

Regarding remediation, our global Whistleblower Policy, which is issued as part of the global Fortress Compliance Manual, establishes procedures for the submission of complaints concerning known or suspected conduct that is potentially unethical or illegal, and how those complaints will be reviewed and investigated.

If issues are identified in relation to modern slavery, these will be reviewed by Fortress's Legal and Compliance Department, FCCDA's directors and/or external legal advisers.

Assessing effectiveness

FCCDA operates under an umbrella of Fortress global compliance and ESG policy frameworks. These policies are periodically reviewed for effectiveness in their intended controls and updated as deemed necessary.

In preparing this statement, we identified the small number of suppliers to FCCDA, which are all reputable professional firms. We verified that these suppliers have (or through their affiliates have) published modern slavery statements, or have published relevant supplier codes of conduct, to assess whether our approach to engaging professional services firms aligns effectively to our approach of addressing modern slavery risk in our supply chains.

FCCDA expects to take further steps in cooperation with FIGA to assess FIGA's supply chain arrangements.


Consultation

FCCDAN, which is the sole subsidiary of the reporting entity FCCDA, does not have physical operations, assets, or employees. In these circumstances, FCCDA achieved consultation with FCCDAN by closely involving a director of both FCCDA and FCCDAN in the preparation of this modern slavery statement.

Approval

This modern slavery statement was approved by the Board of FCCDA, which constitutes the principal governing body of the reporting entity FCCD (Australia) Pty Ltd, on 27 June 2025. It is signed by Mark Kwei, who is a responsible member of the FCCDA Board.

SIGNED for FCCD (AUSTRALIA) PTY LTD:

Signed by:

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 Mark Kwei
 Director
 30 June 2025

Mandatory criteria		Section	Page
1	Identify the reporting entity	Introduction	1
2	Describe the structure, operations and supply chains of the reporting entity	Structure, operations and supply chains	1
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	Risks of modern slavery practices	2
4	Describe the actions taken by the reporting entity and any entity that it owns or controls, to assess and address those risks, including due diligence and remediation processes	Actions taken to assess and address risks	3
5	Describe how the reporting entity assesses the effectiveness of such actions	Assessing effectiveness	4
6	Describe the process of consultation with any entities that the reporting entity owns or controls	Consultation	4
7	Any other information that the reporting entity, or the entity giving the statement, considers relevant		N/A