

Modern Slavery Statement

Exemplar Health (Frankston) Pty Limited
(ACN 649 172 985) as trustee of the
Exemplar Health (Frankston) Trust

Financial Year
2025

Artist's impression - view from Beauty Park.



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Identifying the Entity

This Modern Slavery Statement (**Statement**) is prepared by Exemplar Health (Frankston) Pty Limited (ACN 649 172 985) as trustee of the Exemplar Health (Frankston) Trust (**Exemplar**) and relates to the financial year 1 July 2024 to 30 June 2025.

Exemplar is a Reporting Entity for the purposes of the *Modern Slavery Act 2018* (Cth). Exemplar is committed to having processes in place to minimise the risk of modern slavery in its business operations and supply chain.

Exemplar is committed to having a robust framework and process in place to minimise the risk of modern slavery in its supply chain.

Structure, operations and supply chains



Aerial photo – August 2024

Structure

Exemplar is a special purpose vehicle, formed to enter into a Project Deed with the Minister for Health on behalf of the Crown in right of the State of Victoria (the **State**) to deliver the Frankston Hospital Redevelopment Project in Frankston, Victoria (**Project Deed**).

Exemplar is held by its two equity investors in equal shares:

- Aware Super Pty Limited (ACN 118 202 672) as trustee for Aware Super; and
- Capella Infrastructure Investments Pty Limited (ACN 137 452 567).

Exemplar does not own or control any other entities and does not have any employees. Exemplar has engaged Capella Management Services Pty Limited (ACN 127 727 842) (**CMS**) to provide various services to Exemplar

including contract administration services and staff.

Exemplar's CEO and staff are employed by Capella Corporate Services Pty Limited (ACN 127 727 566) (**CCS**, formerly known as Capella Capital Lendlease Pty Limited) and seconded to Exemplar pursuant to secondment agreements (**Secondment Agreements**). Exemplar's CEO reports to the Board, which is made up of Directors appointed by each of the equity investors. The Exemplar staff, in turn, report to the Exemplar CEO.

The Secondment Agreements require the CEO and Exemplar staff to comply with various Exemplar's procedures and policies. Exemplar also drew on the systems and processes of the Lendlease Group during the reporting period as part of the services provided by CMS under

the MSA modern slavery risk supplier assessment and mitigation measures, noting CMS forms part of Capella Capital, a business that operated within the Lendlease Group during the reporting period.

Our operations and supply chains

Exemplar has been contracted by the State to design and construct the redevelopment of the Frankston Hospital under a public-private partnership framework including:

- design, financing, construction and commissioning of the Works, including a new 12-storey clinical services tower and six-story clinical services podium, increasing patient beds by 130;



Aerial photo – August 2025

- a new main entrance as well as infrastructure to connect the new and existing facilities; and
- facilities maintenance of the new facility and some of the existing facilities.

More information regarding the Frankston Hospital Redevelopment Project can be found at [Frankston Hospital redevelopment | VHBA](#).

Exemplar is party to the following key agreements (Key Agreements). The counterparts to the Key Agreements are based in Australia, and the Key Agreements are the primary mechanisms through which Exemplar operates.

- **D&C Contract** with Lendlease Construction (Southern) Pty Limited (ACN 002 625 130) (formerly named Lendlease Building Contractors Pty Ltd) (the **D&C Contractor**) to deliver

the Development Activities (which include the design, manufacture, supply, construction, installation, commissioning and completion of the Works).

- **Services Contract (Hard FM)** with Honeywell Limited (ACN 000 646 882) to carry out the Services (other than the Reviewable Services) over the Operational Phase (a 25-year term anticipated to commence in January 2026).

- **Services Contract (Soft FM)** with Compass Group Healthcare Hospitality Services Pty Ltd (ACN 114 320 615) to carry out the Reviewable Services (cleaning, waste management, grounds and gardens maintenance, pest control and security) over the Operational Phase.

- **Management Service Agreement** with CMS under which CMS provides services to Exemplar including:

- procurement of staff for secondment to Exemplar;
- financial reporting including preparation of monthly reporting, annual financial reports and tax return preparation;
- recruitment, establishment of business systems, IT systems and bank accounts, and arranging office space; and
- executive and compliance support.

Exemplar procures very few services or goods outside of the Key Agreements, and accordingly has very limited direct supply chain exposure.

Modern slavery risks in our operations and supply chains

In this reporting period the Project activities were primarily design development, completion of structural works and fit out works, which were largely completed during the reporting period. Fit out works saw a significant increase in construction activity, requiring additional procurement activity across both material and labour resources. Development activity began to slow down towards the end of the period, as the project moved toward completion and commissioning.

Exemplar continues to perform periodic risk assessments of its Key Agreements, factoring in the following key risk factors:

- the industry sector of its operating supply chain;
- the types of products and services provided; and
- the business models of its key contractors.

Exemplar's risk assessments continue to identify a low risk in relation to Exemplar, primarily due to Exemplar's limited direct supply chain, which is almost entirely comprised of large Australian-based entities which are themselves reporting entities under the Modern Slavery Act 2018 (Cth). Exemplar is multiple steps removed from the direct manufacture of raw material inputs that are utilised for the Frankston Hospital Redevelopment Project. Due to this, Exemplar's position in the contractual structure and its counterparties, Exemplar relies to a significant degree on the risk screening due diligence, risk control mechanisms and declarations of our direct suppliers to confirm their management of upstream modern slavery risks.

Risk assessments undertaken by Exemplar identified the following risk areas.



FHR at night (Steve Brown)

The key modern slavery risk areas for Exemplar are set out below:



D&C Contract Risk

Exemplar understands there may be elevated exposure to modern slavery risks in the D&C Contractor's supply chain as the D&C Contractor is both subcontracting works and procuring materials through a complex supply chain.

The construction sector has a history of using low-skilled, manual, often temporary migrant labour, which increase its exposure to the risks of modern slavery-type practices. The risk of modern slavery in this sector is essentially related to labour in the supply chain, and or labour engaged in the construction process. Transparency of labour practices in the fabrication of materials and components used in construction offshore is challenging, with long and diverse supply chains, not readily visible to the end product user, distributor or installer.

For direct operations, while much of the construction labour used in Australia is unionised, and a licensing regime operates for labour hire providers in Victoria under the Labour Hire Licensing Act 2018 (Vic), the indirect use of site labour, utilising low-skilled casual manual workers recruited by smaller sub-contractors either informally or as a result of the general contractor remains an area of priority. Having the requisite oversight to ensure due diligence in labour recruiting processes are carried through by a principal contractor is a high priority risk to monitor and includes monitoring:

- lawful methods for sourcing, engaging and paying workers in accordance with industry awards and related entitlements;
- workers are of minimum legal age, and legally permitted to work;
- conditions of work that are formally and clearly conveyed to workers whose first language is not English or whose knowledge of employment rights may be limited;
- evidence of appropriate documentation showing workers' correct pay rates and any entitlements, including payslips, frequency of pay and employment contract; and
- a non-retaliatory grievance pathway for workers to raise concerns confidentially and a process for remediation



Services Contract Risk

Services Contractor risk is not yet present, as the operations phase has not yet commenced and at this time the Services Contractor is providing advisory services only.

We note that the provision of some services, such as cleaning, asset maintenance and security, exists in a price competitive low margin market, sometimes relying on low-skilled migrant labour for viability. We are aware that these service providers will require targeted risk screening when that engagement phase arises and will be planning for this in anticipation



Management Services Risk

Under the Management Services Agreement, CMS provides management services to Spark. These include financial management of Spark (financial reporting, payment of invoices, accounts receivable), financial modelling and the employment of Spark staff. These services are provided directly by employees of Capella Corporate Services Pty Limited (formerly known as Capella Capital Lendlease Pty Limited) (all employees being domiciled and employed in Australia under National Employment Standards).

Suppliers engaged by CMS during the reporting period in supporting the delivery of these services were engaged in accordance with the relevant Lendlease Group procurement and due diligence processes applying to CMS during the reporting period.



Actions taken to assess and address modern slavery risks, including remediation

During the reporting period, Exemplar worked with the D&C Contractor and Services Contractors (together the **Key Contractors**) to assess their approaches to the mitigation of modern slavery risk, including through the completion of questionnaires. Exemplar also undertakes ongoing assessment of risks related to the D&C Contractor by monitoring the monthly reporting related to the use of resources, industrial relations and workplace health and safety standards.

The questionnaires have confirmed that, as reported in their respective Modern Slavery Statements, each of the Key Contractors takes a risk-based approach to this process.

The Modern Slavery Questionnaire will continue to be utilised with the Key Contractors to:

- identify and assess potential elevated modern slavery risks in Exemplar’s supply chain;
- identify mitigation efforts to combat the risk of modern slavery in Exemplar’s supply chain; and

foster collaboration between Exemplar and its Key Contractors in relation to supply chain issues, including understanding supplier verification procedures and internal policies and procedures including workers’ labour conditions and workplace practices.

The Questionnaire will also assist in identifying specific risks or subcontractor engagement process which require further targeted risk screening

During the reporting period, Exemplar staff complied with the following Lendlease Group policies which respond to modern slavery risks:

Key Lendlease Group Policies	Description
Environmental Health and Safety	Sets up oversight and management of Environmental Health and Safety and embedment of Global Minimum Requirements
Lendlease Global Minimum Requirements (GMRs)	The GMRs operate as minimum Environment Health and Safety standards for how we operate anywhere in the world. All suppliers and their supply chains are required to observe these policies when working on our projects.
Employee Code of Conduct	The Code explains the standards the Company expects in the conduct of its operations and supports the Core Values, especially Integrity (which is “not negotiable”).
Conduct Breach Reporting Policy	Enables employees (their families), contractors, suppliers and agents to speak up and report illegal or improper conduct occurring in the business, including behaviour that does not accord with our Core Values, Employee Code of Conduct or Supplier Code of Conduct.
Diversity and Inclusion Policy	Sets out commitments to workplace diversity and inclusion and conveys goals, measures and management approach.
Anti-Bribery Anti-Corruption Policy	All directors, employees and third parties are to observe the UK Bribery Act 2010 wherever they operate, and for third parties, including suppliers, to have undergone compliance processes for screening plus due diligence checks.

Exemplar has, where appropriate, also included modern slavery risk provisions in new agreements executed by Exemplar.

Remediation

We recognise there is not a ‘one size fits all’ approach to providing remedy, and that a legitimate remediation response is tailored to the particular facts of a situation.

Each of the Key Contractors has non-retaliatory grievance mechanisms and remediation in place, and seek information from their own suppliers and subcontractors on their implementation approach and level of process embedment.

Exemplar will investigate any report of potential occurrences of modern slavery taking place in its operations or supply chain, and will take all appropriate steps to rectify any confirmed incidents. Exemplar will work collaboratively with our Key Contractors to achieve this goal.



Assessing the effectiveness of actions taken for mitigating modern slavery risks

On an annual basis, Exemplar reviews the effectiveness of the actions taken to address Modern Slavery risk in Exemplar’s operations and supply chain through reviewing the Modern Slavery Questionnaires completed by the Key Subcontractors together with a review of the Key Subcontractors Modern Slavery Statements. The review is performed by Exemplar’s legal and commercial team to identify and assess any new risks that may have emerges in the course of Exemplar’s operations and supply

chain. In the course of the annual review, if there are identified exceptions, these findings are presented to the Exemplar Board for response, monitoring and corrective action. Exemplar understands that reviewing and assessing the efficacy of the actions and processes put in place to combat modern slavery risks in our supply chain is a critical step in achieving our goal of eliminating modern slavery in our operations.

While we are well progressed on processes to understand the risks of modern slavery, we are continuing to develop our framework for assessing effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains. We are looking to implement a statistical assessment of the Key Subcontractor Questionnaires in order to assess meaningful improvement in relation to de-risking our supply chain from a modern slavery perspective.

Consultation and engagement undertaking on managing modern slavery risks

The following governance process has been implemented by Exemplar to provide the Exemplar Board oversight of Exemplar’s actions to manage its modern slavery risk:

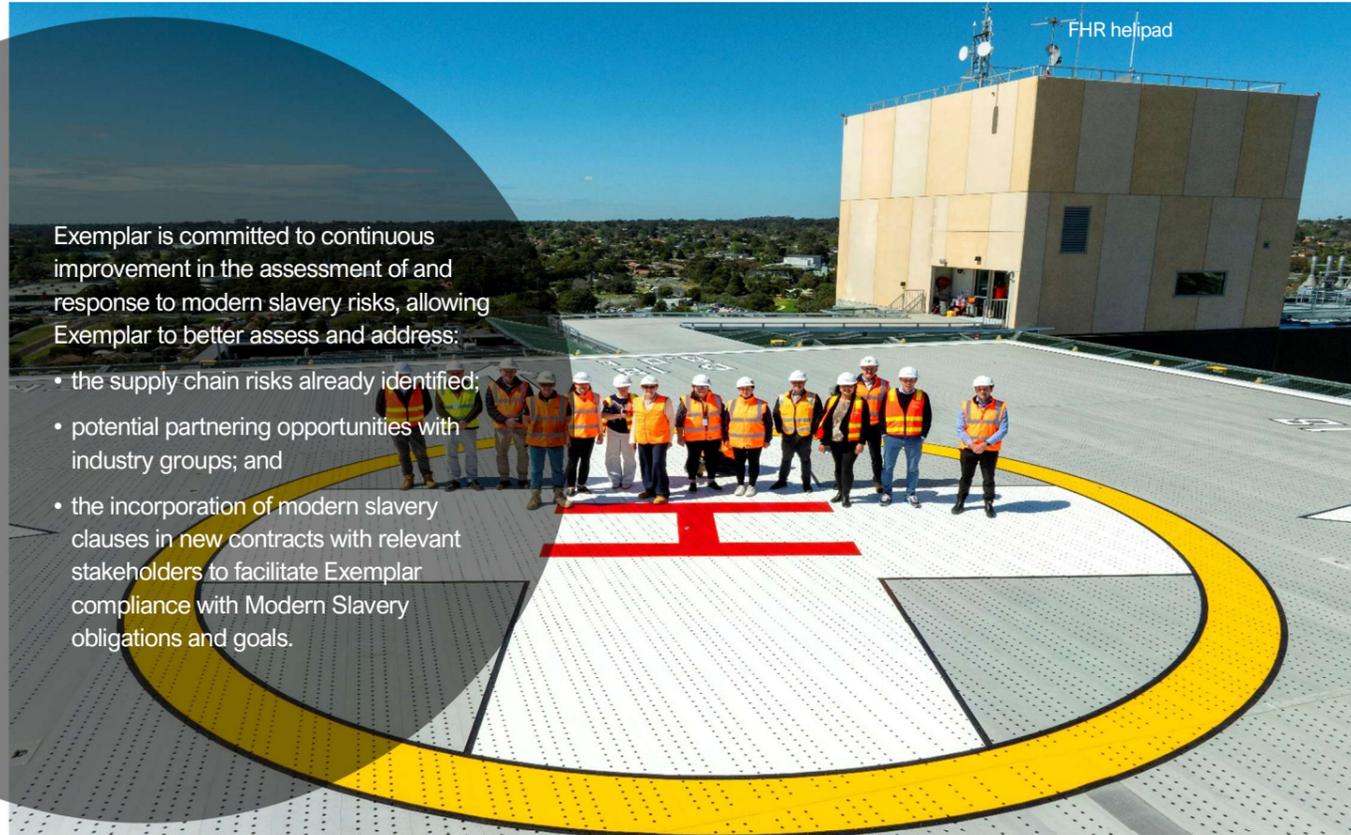
- Established a working group consisting of Exemplar’s CEO and commercial director to effectively manage modern slavery risk, discharge the obligations imposed on Exemplar set out in this Statement and otherwise ensure compliance with the Modern Slavery Act; and

- On an annual basis and if there are exceptions to report, the working group will provide the Exemplar Board with its findings in relation to assessment of potential risks and mitigating actions.
- In addition, Exemplar has undertaken supply chain engagement via the Modern Slavery Questionnaire, meeting with its Key Contractors to discuss modern slavery risk and making the Victorian government’s Supplier Code of Conduct available to all of its contractors to assist them in identifying high-risk suppliers.
- Exemplar requires all of its Key Contractors to read and aspire to comply with the Victorian government’s Code of Conduct, as well as requesting its Key Subcontractors to annually confirm in writing that they have read and understood the Exemplar Supplier Code of Conduct.
- During the reporting period, no reports were logged regarding modern slavery or labour rights concerns through Ethics Point, nor through other channels as far as we are aware.

Consultation and additional information

Exemplar is committed to continuous improvement in the assessment of and response to modern slavery risks, allowing Exemplar to better assess and address:

- the supply chain risks already identified;
- potential partnering opportunities with industry groups; and
- the incorporation of modern slavery clauses in new contracts with relevant stakeholders to facilitate Exemplar compliance with Modern Slavery obligations and goals.



Looking back

During the reporting period the Project achieved a number of significant milestones, including the completion of structure and significant progress on building fitout. This period included the most intensive period of the project in terms of labour and other procurement, and it is pleasing that the project successfully negotiated this stage with no reports to Ethics Point.

Furthermore, responses to the Modern Slavery questionnaires used to assess and report on the effectiveness of the Key Subcontractors actions to mitigate modern slavery risks indicated that there were no other modern slavery exceptions to report.

Looking ahead

Exemplar will be working closely with the Key Subcontractors during the procurement period for the commencement of the operational phase of the project, when a number of new employees and contractors will be coming on board. This period will represent an elevated risk period from a modern slavery perspective as the Services Contractor risk identified in our assessment of our operations.

Exemplar will also be looking to establish a metric by which the efficacy of modern slavery risk mitigation actions can be assessed.

This Statement is made pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and constitutes the Modern Slavery Statement for Exemplar.

The Statement has been prepared by the Exemplar CEO and was approved by the Exemplar Board on 3 December 2025.

Signed: 

Director name: Sarah Neaves
Chair of Exemplar Health (Frankston) Pty Limited

Date: 8 December 2025

Exemplar Health (Frankston) Pty Limited
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