

## Modern slavery statement

### Commercial & General Pty Ltd

Reporting period 1 July 2020 to 30 June 2021

#### Introduction

This modern slavery statement (**Statement**) has been published by Commercial & General Pty Ltd (**C&G**) pursuant to the *Modern Slavery Act 2018* (Cth) (**the Act**) in respect of the reporting period ending 30 June 2021 (**Reporting Period**) and covers C&G and controlled entities (**C&G Group**).

C&G Group is not a Reporting Entity within the meaning of the Act for the Reporting Period. This Statement is published on a voluntary basis as part of its commitment to addressing modern slavery risks in its operations and supply chains consistent with the objectives of the Act. C&G Group is committed to assessing, in so far as reasonably practicable, any risks of modern slavery in its operations and supply chains and taking appropriate steps to address those risks.

This is the first Reporting Period for which the C&G Group has submitted a Statement.

This Statement outlines the steps C&G Group has taken during the Reporting Period and its future plans to identify and address modern slavery risks in its operations and supply chains.

#### Modern slavery

C&G Group recognises that modern slavery takes many forms which are crimes and a violation of fundamental human rights involving the deprivation of a person's liberty and exploitation for personal or commercial gain. Modern slavery includes:

- human trafficking;
- recruitment with the intention of depriving a person of their personal freedoms;
- confiscation of personal or travel documents;
- forced labour;
- debt bondage;
- servitude;
- child labour; and
- any other kind of exploitation that violates a person's human rights and dignity.

#### Structure, operations, and supply chains of the C&G Group

The C&G Group is a vertically integrated property group that develops, constructs, manages and invests, in high quality commercial, industrial, and multi-unit residential properties in Australia. C&G Group is based in Adelaide and also has offices in Melbourne. The entities within the C&G Group are fully integrated and share common management and administration services and systems.

C&G Group undertakes in house project management and engages third party consultants to assist in managing and delivering projects.

C&G's major suppliers are:

- large scale building contractors engaged in connection with projects;
- third party building, construction and property management consultants.

All of C&G Group's projects and operations are situated in Australia.

C&G Group also has interests in joint ventures which hold industrial property portfolios in Australia.

### **Risks of modern slavery practices in the operations and supply chains of the C&G Group**

The C&G Group has undertaken an initial assessment of modern slavery risks within its operations and supply chains.

C&G Group's operations are conducted within Australia with Australian based employees. Builders and consultants with which C&G Group contracts are also based in Australia although they may be part of groups with multinational operations. We have determined that given the low prevalence and risk of modern slavery practices in the industry within Australia, these operations have a low or negligible risk of modern slavery practices.

C&G Group has identified a potential for modern slavery risks in building and construction supply chains in so far as building and construction supplies may be sourced from regions where labour and manufacturing conditions are more likely to involve modern slavery practices. C&G Group does not have visibility over these aspects of its supply chain.

C&G Group has also identified a potential for modern slavery risks in IT and business administration supply chains in so far as some of those services have overseas offices. C&G Group does not have visibility over these aspects of its supply chain.

C&G Group is establishing a process for making enquiries of its major suppliers with respect to modern slavery risks and the management of those risks in these supply chains.

### **Actions taken by the C&G Group to assess and address risks of modern slavery, including due diligence and remediation processes**

#### Supply chain due diligence

To enable C&G Group to assess the risks of modern slavery in our supply chains, C&G Group is implementing a process of making enquires with our major suppliers about risks in their supply chains and how modern slavery risks are managed by them.

The responses to these enquiries will be used to assess the nature and extent of modern slavery risks in the supply chains of our major suppliers and to assist C&G Group in identifying possible mitigation steps that can be built into C&G Group's supplier selection and contracting processes.

#### Modern slavery supplier code of conduct

C&G Group will be developing a modern slavery supplier code of conduct (**Supplier Code**) which reinforces our commitment to ethical business operations and our expectations of our suppliers. Those expectations include:

- sharing our commitment to mitigating modern slavery risks in our supply chains;
- taking meaningful steps to identify and address modern slavery risks in their operations and supply chains;
- complying with any mandatory reporting obligations relating to modern slavery;
- providing the C&G Group with information about their supply chains to assist us in identifying and mitigating modern slavery risks.

Once implemented, C&G Group will monitor compliance with the Supplier Code and take appropriate steps, to the extent practicable, to address instances of non-compliance including integrating this into our supplier selection and contracting processes.

#### Contractual terms

C&G Group is introducing changes to its standard trading and contract terms with its suppliers to include terms designed to facilitate the identification and mitigation of risks and to eliminate modern slavery practices.

#### Other

C&G Group plans to facilitate training sessions for staff to outline key principles of modern slavery and to train staff to better assess suppliers in the context of C&G Groups modern slavery code of conduct.

## **Review of C&G Group's policies, processes and practices**

C&G Group is undertaking an overall review of its policies, processes and practices and is establishing a framework and action plan for progressively integrating measures designed to address modern slavery risks across its operations. C&G Group will periodically review and monitor progress against its modern slavery action plan. Examples of the measures that C&G Group will be considering as part of its action plan are outlined below.

## **Assessing the effectiveness of actions taken to address modern slavery risks**

C&G Group's modern slavery action plan includes establishing processes for regularly reviewing and reporting on the effectiveness of the steps taken to identify and mitigate modern slavery risks including:

- monitoring supplier responses to our modern slavery risks enquiries;
- tracking supplier compliance with our Supplier Code;
- assessing the level of internal and external awareness of and commitment to eliminating modern slavery practices.

## **Future commitments**

As noted above C&G Group intends to progressively integrate modern slavery risk mitigation measures across its operations under a modern slavery action plan.

Future measures that C&G Group will be considering as part of its action plan will include:

- integrating modern slavery information and provisions into all relevant human resources policies;
- establishing internal processes for monitoring responses to supplier enquiries, tracking progress of implementing our modern slavery mitigation measures and assessing the effectiveness of measures already implemented;
- continuing to roll out new trading and contractual terms incorporating modern slavery clauses;
- integrating modern slavery risk assessment into the onboarding of new suppliers and ongoing assessment of existing suppliers;
- expanding the scope of supplier enquiries about modern slavery matters;
- once implemented, regularly reviewing supplier compliance with the Supplier Code and modern slavery trading and contractual terms; and
- training for officers and employees to improve their knowledge of modern slavery and increase their ability to identify potential risks in our operations and supply chains.

## **Approval**

This Statement has been approved by the board of C&G and is hereby signed by C&G Group's Chief Executive Officer.



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**Trevor Cooke**  
Chief Executive Office