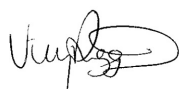


# FY22 Modern Slavery Statement

For Financial Year ending 31 December 2022

## Reporting Entity

This statement is submitted under section 13 of the Modern Slavery Act 2018 (Cth) for the Keppel REIT (Australia) Trust ABN 76 971 120 912 ("Trust"). This Statement has been prepared by the Trustee The Trust Company (RE Services) Limited ACN 003 278 831 and approved by the board of directors of the Trustee on 26 June 2023.



Vicki Riggio

Director

The Trust Company (RE Services) Limited

## Consultation

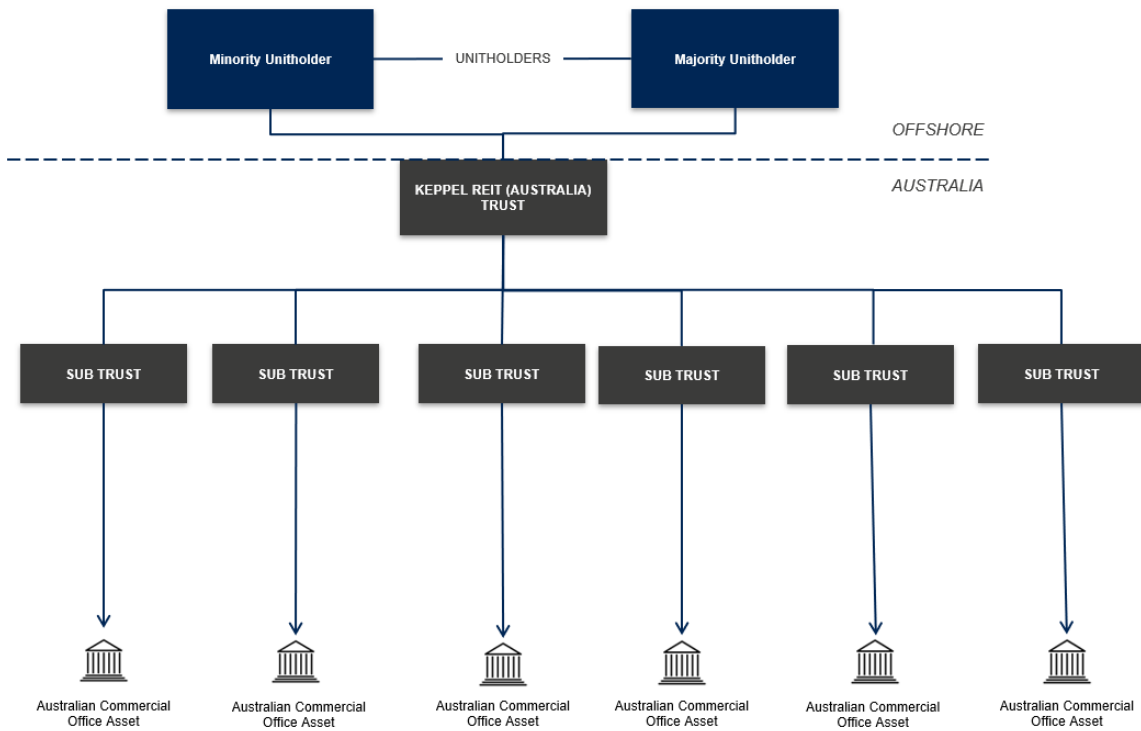
There are no subsidiaries or entities owned or controlled by the Trust which the Trustee is required to consult with to prepare this Statement. This statement was developed in consultation with the unitholder representatives for the Trust.

## Structure, Operations and Supply Chain

### Structure

Keppel REIT (Australia) Trust is domiciled in Australia and has been in operation since 2010. The Trust invests in Keppel REIT (Australia) Sub Trusts 2, 3, 4, 5, 6 and 7 ("the Sub Trusts"). The Trust owns no direct real property and has no employees.

# KEPPEL REIT (AUSTRALIA) TRUST



## Operations

The primary operation of the Trust is the investment in the Sub Trusts, which are fixed unit funds with a portfolio of investment grade commercial properties in Australian capital cities. Perpetual Limited's division Perpetual Corporate Trust is trustee for this trust, as well as trustee for the Sub Trusts.

## Perpetual Corporate Trust (PCT)

Perpetual Corporate Trust Ltd is an entity that is controlled by Perpetual Limited and covered in Perpetual's modern slavery statement. PCT provides a broad range of fiduciary, agency and digital products to the debt capital markets and managed funds industries both domestically and internationally. Debt Market Services includes trustee, document custodian, agency, trust management, accounting, standby servicing, and reporting solutions. Perpetual Digital provides data services, industry roundtables, and our new Perpetual Intelligence platform-as-a-service products supporting the banking and financial services industry. Managed Funds Services provides services including independent responsible entity, wholesale trustee, custodian, investment management and accounting.

## Investments

The Trust's total assets was a total of \$1.775bn. The major asset classes of the Sub Trusts were commercial property, and specifically office buildings. The account is domiciled in Australia.

## Supply chain

The Trust's supply chain consists of fourteen direct service providers. These service providers are all located in Australia.

## Procurement categories for service providers are:

- Investment management and custodian services.
- Fund accounting and tax agent services.
- Legal representation.

- Architectural consultancy services.
- Land Surveying and Land Titling services
- Property Valuation and Market Analytics services
- Environmentally Sustainable Design and Engineering consultancy services

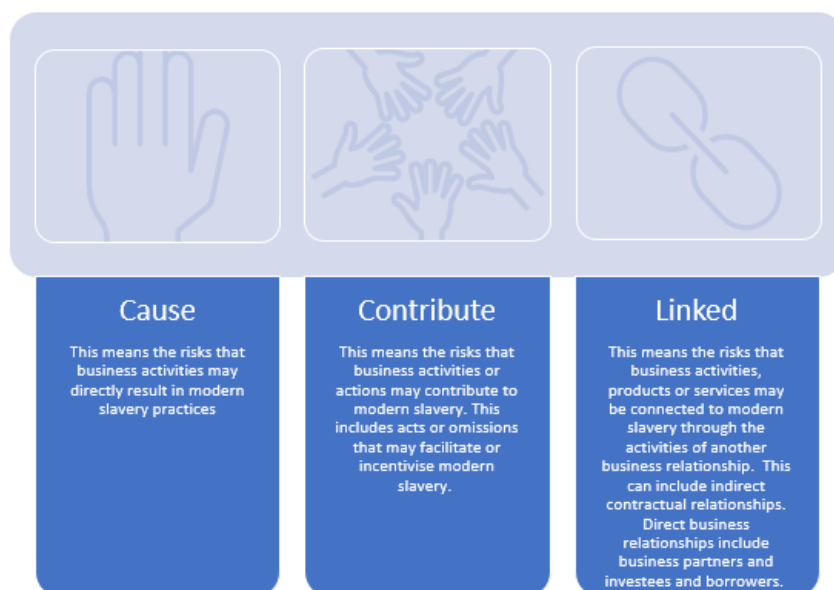
## Modern Slavery Risks

The Trustee understands that modern slavery risk can occur in operations and supply chains. The Trustee consider risk assessment a critical process to identifying the inherent risk of modern slavery across the Trust. As Trustee, we conduct an annual risk assessment on all Trusts that meet the Modern Slavery Act reporting threshold. The risk assessment is done separately to Perpetual Group’s corporate modern slavery risk assessment and is in addition to routine due diligence activities undertaken for management of the Trust.

### Defining modern slavery risks

Modern slavery is serious exploitation that undermines a person’s freedom. In a situation where modern slavery occurs, a person cannot refuse or leave due to threats, violence, coercion, abuse of power, or deception<sup>1</sup>. Modern slavery occurs in a variety of forms, there are eight types including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour<sup>2</sup>.

Modern slavery risk means the potential for the Trust to cause, contribute to, or be directly linked to modern slavery through their operation or supply chain. This means looking at risks to people rather than risk to the company (such as reputational or financial damage), although often these risks are connected. The Trust recognises that COVID-19, conflict and climate change has exacerbated modern slavery risks for people in vulnerable situations<sup>3</sup>.



<sup>1</sup> International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM), 2022. Global Estimates of Modern Slavery: Forced Labour and Forced Marriage, 13.

<sup>2</sup> As defined in the Australian Modern Slavery Act 2018 (Cth)

<sup>3</sup> International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM), 2022. Global Estimates of Modern Slavery: Forced Labour and Forced Marriage

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## Risk assessment methodology

It is possible that Perpetual, as Trustee, may be linked to modern slavery via the investments and suppliers within the Trust. In FY22, the Trustee collected information on the Trust's supply chain and operations to include in a modern slavery risk assessment. Specifically, the Trustee investigated the investment trust and service providers that we have a direct relationship with. The investment trust and service providers were then assessed for inherent modern slavery risks and an inherent risk profile was determined for each entity. Inherent risk is the level of risk before any actions are taken to manage the risk's impact or likelihood.

## Risk Assessment Results

### Investments

The Trust's investment footprint is concentrated as all their assets are held in Sub Trusts. The FY22 risk assessment conducted by the Trustee revealed that this investment sector is considered to have a high inherent risk, as it is a part of the property and construction industries. The below information summarises the risks in this industry. The approach to due diligence and assessment is informed by this risk profile.

Investment Sector	Inherent Risk Profile
Office Buildings	The property and construction industries have a higher risk of modern slavery due to the high demand for low-skilled labour, limited visibility of long and complex supply chains and low-tier suppliers that operate in high-risk geographies <sup>4</sup> .

### Supply Chain

The Trustee's FY22 risk assessment did not identify any high-risk service providers. The Trustee's FY22 risk assessment identified that all components of the Trust's supply chain are low risk. This is because all service providers are professional services providers who operate in Australia.

Sector/Product	Inherent Risk Profile
Professional Services	There is low inherent risk of modern slavery risk in professional service providers, such as accountants and tax agents, located in Australia as these services providers tend to attract a higher skill level.

## Actions to Address Modern Slavery Risks

It is impracticable for the Trust to address modern slavery risks in parts of its operations or supply chains in the same way that a company would. That is because the Trust has limited operations and supply chains and has limited control over its investments. For example, the Trust does not make management decisions with respect to the Trust's business.

The Trust's approach to addressing modern slavery risks is as follows. Perpetual has a process for all trusts to follow for modern slavery reporting. This process includes:

- Engaging with clients to ensure they are aware of the modern slavery reporting obligations and seeking their input to Modern Slavery Statements
- Training for our Trust Client Managers conducted by our Sustainability and Modern Slavery Manager
- Risk assessment tool – used by Trust Client Managers, to conduct a fit for purpose risk assessment for entities the Trust directly engages with.

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<sup>4</sup> KPMG and Australian Human Rights Commission, 2020. [Property, Construction & Modern Slavery: Practical responses for managing risk to people](#), 9.

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As a trust within the Keppel REIT's portfolio, the Trust is subject to the following group wide modern slavery, and broader ESG, policies and controls:

- A robust Enterprise Risk Management Framework which forms part of Keppel REIT's System of Management Controls, provides a holistic and systematic approach to risk management. It outlines the reporting structure, monitoring mechanisms, specific risk management processes and tools, as well as Keppel REIT's policies and limits in addressing and managing key risks identified.
- The Board and management of Keppel REIT Management Limited meet quarterly, or more frequently, when necessary, to review Keppel REIT's performance, assess its current and emerging risks, as well as respond to feedback from the risk and compliance manager and auditors.
- Keppel REIT has in place, a supplier code of conduct, which requires acceptance and adherence by all suppliers prior to commencement of the contracted activity. Human rights is prescribed as a category of the standard of conduct and is guided by the United Nations Guiding Principles on Business and Human Rights.

## Due Diligence

### Risk assessment

The Trustee's annual risk assessment was conducted to assess the Trust's inherent modern slavery risks. The results of the risk assessment are used to prevent, identify, and address modern slavery risks that may exist within the Trust's supply chain.

### Investments

Keppel REIT (Australia) Trust has ownership interests of between 50% to 100% in six properties in Australia, which are held through underlying property trusts. Modern slavery risk is assessed and managed at the property level by each property manager. As required by law in Australia, each of these property managers issue detailed and comprehensive annual Modern Slavery Statements and have established Modern Slavery Frameworks which set the organisation's approaches to modern slavery. Each property manager's FY22 annual statement can be found on the Australian Modern Slavery register and covers all aspects of property development and management including the asset management supply chain, development supply chain and operation and corporate supply chains.

The FY22 risk assessment has identified one high risk investment sector category. During the reporting period, the Trust incorporated modern slavery considerations into its investment policies and processes. For example, the requirement that all suppliers accept and adhere to a supplier code of conduct prior to the commencement of contracted activities.

The Trust ensures accountability for modern slavery issues within the investment process by applying a robust Enterprise Risk Management Framework and adopting a five-step risk management processes comprising risk identification, risk assessment, formulation of risk mitigation measures, communication, and implementation, as well as monitoring and review. Any investment decisions must satisfactorily pass through this process prior to voting on investment resolutions.

### Supply Chain

The Trust engages with suppliers and other entities on modern slavery by including modern slavery clauses in standard terms of engagement. It also requires suppliers to accept and adhere to a supplier code of conduct prior to the commencement of contracted activities.

### Remediation

As a Trustee, Perpetual may be linked to modern slavery through our business relationships with other entities via their own investments and supply chains. It is unlikely that Perpetual in its role as Trustee will cause or contribute to modern slavery, however we could be linked to modern slavery via business relationships further down the investment or supply chain of the entities for which we are the Trustee. An example of this is where an indirect supplier further down the supply chain has employees within a low-skilled labour section such as cleaning, security and maintenance. This sector can have a risk of exploitation if appropriate risk mitigation is not put in place.

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Perpetual Group's remediation approach is outlined in our Modern Slavery Framework. Should an incident of modern slavery occur in a Trust which we have 'caused or contributed' to, we would engage with the Unitholder Representative and act in accordance with our remediation principles.

The purpose of remediation is to ensure Perpetual takes reasonable steps to:

- Address the underlying root causes driving the modern slavery if possible;
- Prevent the modern slavery impact from re-occurring by collaborating, supporting remediation, and monitoring the implementation of remedial measures taken by another party; and
- Ensure compliance with national and international labour and human rights standards.

Our remediation process has been approved by the Executive Committee and has been captured in our Modern Slavery Framework. The process details specific steps that we will take if Perpetual has 'caused or contributed' to modern slavery.

Our approach to remediation is led by a set of guiding principles. These include ensuring that our actions are in the best interest of the suspected victim or victims and responding in a way that is appropriate to the circumstances of the situation.

The principles also articulate that we will take steps to prevent further harm to achieve the best possible outcome for the victim or victims and consider whether there is any action that Perpetual can take that may address the underlying structural factors that have contributed to the exploitation.

Our Modern Slavery Framework, including the remediation process, is available to our employees on our intranet.

### **Grievance mechanism**

Modern slavery is a form of reportable misconduct under Perpetual's Whistle-blower Policy. Through this mechanism, employees can report any concerns to a Whistle-blower Protection Officer within Perpetual or anonymously through our third-party whistle-blower hotline. Training on how to access and report through this mechanism are provided in our employee-wide modern slavery training program.

### **Measuring the Effectiveness of Actions**

Outlined below is the key progress made by the Trustee on behalf of the Trust in FY22 and the actions for FY23.

#### **FY22 progress:**

- Mapped the Trust's supply chain to identify the different sectors our service providers are from
- Conducted annual risk assessment to determine inherent modern slavery risks
- Reviewed and updated our process for assessing and reporting on modern slavery in Trusts
- Engaged with the Attorney General's Department to seek feedback on our Modern Slavery Statements for Trusts

#### **Actions for FY23**

- Monitor emerging global trends in modern slavery and include anything relevant for the FY23 risk assessment
- Commitment to have Trust statement reporting process reviewed annually.
- Review and update modern slavery training for Trust Managers
- Develop SMEs within the Trustee business to improve engagement and reporting

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## Appendix

### Appendix 1: Australian Modern Slavery Act – Mandatory Reporting Criteria

The following table describes the location of each mandatory reporting criteria within the FY22 Modern Slavery Statement.

Mandatory Reporting Criteria	Location in Statement
Identify the reporting entity	Reporting Entity, Page 1
Describe the reporting entity's structure, operations, and supply chains	Structure, Operations and Supply Chain, Page 1-2
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Modern Slavery Risks, Page 3-4
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Actions to Address Modern Slavery Risks, Page 4-6
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Measuring the Effectiveness of Actions, Page 6
Describe the process of consultation and any entities the reporting entity owns or controls	Consultation, Page 1