WINGATE
A CapitaLand Investment Group Company

MODERN SLAVERY STATEMENT

December 2025

The federal *Modern Slavery Act 2018* (Cth) requires mandatory reporting and disclosure on the following criteria.

1. The reporting entity to which this Modern Slavery Statement applies

This joint modern slavery statement (**Statement**) is made on behalf of CLII Bluebell Pty Ltd (ABN: 67 678 938 951), Wingate Group Holdings Pty Ltd (ABN: 82 128 511 035) and CLII Waratah Pty Ltd (ABN: 27 678 938 782) (together, the reporting entities) by CLII Waratah Pty Ltd (ABN: 27 678 938 782), which is an entity in a position to influence or control each of those reporting entities. In this Statement, the reporting entities are collectively referred to as **Wingate**.

Wingate, a CapitaLand Investment (CLI) Group company, is a leading Australian private credit investment manager that specialises in real estate and mid-market corporate debt solutions. Wingate's investors include global financial institutions, local and international family offices and private individuals. Our success is built on our ethical approach, deep capabilities in debt and our ability to inspire trust in our partners.

Founded in 2004, Wingate's investment philosophy is backed by our dedicated teams with expertise in real estate and corporate credit. Each investment is underpinned by a rigorous risk management framework, which has enabled the delivery of strong returns and sustainable growth for our co-investors through economic cycles.

Committed to fostering long-term, trusted relationships, we uphold a deep sense of responsibility towards our people, co-investors, shareholders, and business partners.

During the reporting period, Wingate became part of CLI following its acquisition. Wingate remains the reporting entity for the purposes of this Statement, and this Statement has been prepared having regard to Wingate's structure, operations and supply chains during the relevant reporting period.

CLI purchased Wingate's Investment Management business only. Wingate's principal investment and related strategies, including portfolio companies, ORDE Financial, Fifo Capital and Talaria Asset Management, and the Specialised Finance Fund, were excluded from the transaction. These assets were spun out into Fancourt Capital Group (FCG), a new and unconnected investment firm.

Pre June 2025

Wingate manages approximately A$7 billion of total facility limits on loan books, investor funds and other assets across its key business units: Wingate Property, Wingate Corporate Investments, Funds Management, ORDE Financial, Talaria Capital and FIFO Capital.

Post June 2025

Wingate manages approximately A$3 billion of total facility limits on loan books, investor funds and other assets across its key business units: Wingate Property, Wingate Corporate Investments and Funds Management.

Wingate is based in Melbourne and has offices across Australia employing approximately 106 employees.

Wingate has no operations outside Australia. However, Wingate has a small number of joint ventures in the United States. Apart from a limited number of reputable IT suppliers and recruitment agents who are based outside Australia but have an Australian presence, Wingate sources all of its products and services in Australia.

Wingate has assessed the risks of modern slavery in its products, services and supply chains as low.

2. Wingate's structure, operations and supply chain activities undertaken to pursue its business activities and objectives in Australia

2.1 STRUCTURE

Prior to June 2025, Wingate Group Holdings Pty Ltd was a private company incorporated in Australia, with a diverse shareholder base comprising Wingate executives, institutional investors and some other investors. Since June 2025, Wingate is a wholly owned subsidiary of CLI.

Wingate only operates in Australia and employs staff on-shore according to current federal and state legislation. It has a small number of joint ventures outside Australia in the United States – these are managed on-shore.

2.2 OPERATIONS

Wingate has the following key business units within its corporate structure.

Wingate Credit

Wingate Credit is a specialist property investor and financier, providing financing solutions for property owners and developers, and investment opportunities for co-investors.

Wingate Corporate Investments

Wingate Corporate Investments invests in mid-market businesses by providing flexible debt solutions to businesses with a focus on credit. It provides capital for growth, acquisition, working capital, bridge financing and loan books.

Funds Management

Funds Management is the capital raising business within Wingate. Funds Management is focused on investor acquisition and relationship management, private markets and institutional capital raising, product development, fund and portfolio investment management and delivery of optimal capital solutions and allocations.

(Pre-June 2025) Residential and Commercial Mortgages (ORDE Financial)

ORDE Financial is a specialist residential, commercial and self-managed super funds lender providing loans secured by first mortgage over property.

(Pre-June 2025) Invoice and Supply Chain Finance (FIFO Capital)

FIFO Capital offers innovative invoice, supply chain and trade finance solutions for small to medium sized enterprises (**SMEs**) and corporates through a network of business partners.

2.3 PRODUCTS

Wingate provides investors with access to private debt or equity investment opportunities across the property and corporate asset classes. Wingate's investment products are structured predominantly as managed investment schemes (unit trusts) or direct individual investment opportunities.

Investment Products

Wingate's flagship investment offering is the Wingate Investment Partners Trust (**WIP**). WIP has approximately A$1 billion of funds under management and invests in a diversified portfolio of secured private debt opportunities. These investments are originated by Wingate across the property, property construction, residential property, corporate and SME sectors.

Other investment products include:

a) the Wingate Property Senior Debt Fund (**WPSD**), which invests in senior secured property debt opportunities in Australia;
b) the Wingate Corporate Horizon Fund (**WCHF**), which is an open-ended fund investing in direct lending and structured finance opportunities to

mid-market companies across a wide range of industries;

c) the Wingate Corporate Credit Funds (**WCCF1, WCCCF2** and **WCCF3**), which invest in loans to mid-market companies in Australia and New Zealand and discounted debt securities on secondary markets. These are closed ended funds;
d) the Wingate Direct Property Investments; and
e) the Wingate Cash Management Trust.

Investors are also invited to co-invest alongside Wingate's/CLI's balance sheet on an investment-by-investment basis where other opportunities arise.

Wingate's investment products are designed and established in Australia by Wingate employees, with independent input from specialist advisors such as law, tax, and accounting firms.

Wingate has established processes to assess investors from an anti-money laundering and a wholesale investor perspective under the *Corporations Act 2001* (Cth) to ensure that it "knows its clients".

Funding products

Wingate provides capital (either debt or equity) to domestic property developers, property investors, home owners, corporates, SMEs and financiers in Australia.

Wingate's funding solutions are designed and established in Australia by Wingate employees with input from property valuers and specialist advisors from law, tax and accounting firms.

Investment opportunities are thoroughly assessed by senior business executives and credit committees to formally sign off on each investment. Funding solutions are flexible and designed to best fit each individual opportunity, taking into account the relevant risks and circumstances.

Wingate does not generally control the subsequent actions, operations or supply chains of the entities or individuals in which it invests, or to whom it lends money, other than through the contractual rights and protections agreed for the relevant arrangement. Accordingly, Wingate's ability to influence or monitor downstream activities is limited. However, Wingate recognises that its funding and investment activities may give rise to modern slavery risks where it is connected to higher-risk sectors, projects or counterparties, and it considers these risks through its investment, lending and due diligence processes on a risk-based and proportionate basis.

2.4 SUPPLY CHAINS

Wingate uses supplies in the normal course of its business, such as IT, finance, telecommunications, the rental of premises, printing and stationery, and catering.

Wingate does not operate complex or extended supply chains in connection with the production of its products and services.

Wingate contracts with Australian firms for the supply of these products and services (limited exception applying to reputable IT suppliers, all with an AU-presence).

3 The risks of modern slavery practices in the operations and supply chains of Wingate and the entities that it owns or controls

We note that risks of modern slavery practices involve the potential for Wingate to cause, contribute to or be directly linked to modern slavery through its operations and supply chains. In other words, the risks that Wingate may be involved in modern slavery, resulting in risks to people, rather than risks to its business, for example, reputational.

The risks of modern slavery practices in Wingate's operations may exist in the following ways.

3.1 INVESTMENT PRODUCTS

Funds from individuals or entities received into Wingate's investment products may have been derived from modern slavery practices, in a way similar to funds derived from other types of criminal activity. The level of this risk depends on the location of the investment, the industry, the type of service and the level of control in the organisation.

3.2 FUNDING PRODUCTS

Wingate's funding products may fund individuals or entities who engage in modern slavery practices. For example, a Wingate funding product may fund the construction of a development involving the use of labour subjected to modern slavery practices. There is therefore a risk that provided funds or assets could be used in companies or projects that exploit people for personal or commercial gain, resulting in modern slavery. The level of this risk depends on the location of the investment, the industry, the type of service and the level of control in the organisation.

3.3 OPERATIONS

Wingate only operates in Australia and employs staff on-shore according to current federal and state legislation.

Appropriate processes are in place to monitor payroll and working conditions, and to ensure appropriate employment contracts and controls are implemented.

The risks of modern slavery practices within the operations of Wingate are low.

3.4 SUPPLY CHAINS

Wingate uses the products and services of a range of suppliers who may engage in modern slavery practices. While Wingate assesses this risk as low overall, it recognises that certain categories of services, including facilities, cleaning, technology hardware and labour hire or recruitment services, may carry higher inherent modern slavery risk depending on the nature of the supplier, workforce arrangements and geographic exposure.

4 The actions taken by Wingate and the entities that it owns or controls to assess and address those risks, including due diligence and remediation processes

Wingate conducts due diligence to identify, prevent, mitigate and account for the risks of modern slavery in its products, operations and supply chains, and executes controls that are proportionate to, and appropriate for, managing the specific nature of these risks.

Since June 2025, Wingate has augmented its group policies with those of CLI. Wingate must report to group representatives as to its adherence to these global policies.

Wingate understands the risk landscape of its investment products, funding products, operations, and supply chains, and has devised appropriate controls and responses to address these risks.

Wingate has assessed the risks of modern slavery in its products and services as low and has responded to these risks as follows:

4.1 INVESTMENT PRODUCTS

Wingate undertakes a due diligence process in relation to individuals and entities who invest in Wingate's investment products in respect of anti-money laundering and wholesale investor status. Insofar as is possible, this due diligence process determines the likely source of the investment funds and mitigates the risks that the funds have been derived through modern slavery practices.

4.2 FUNDING PRODUCTS

As noted above, in assessing whether to invest in, or lend money to, an individual or an entity, Wingate undertakes a stringent due diligence process to ensure that the individual or entity is worthy of the investment or loan.

This due diligence process involves a consideration of whether the individual or entity is likely to comply with the laws and regulations that apply to its business and whether that individual or entity is likely to operate in an ethical manner.

4.3 OPERATIONS

Wingate's operations, conducted solely in Australia, are conducted in compliance with federal and state laws and regulations.

Wingate has a whistleblower policy. Under this policy, anyone being a director, manager, employee, contractor or other associate of Wingate is able to report any unethical activities that they observe, anonymously if required.

4.4 SUPPLY CHAINS

Wingate sources input products and services from Australian companies (limited exception applying to reputable IT suppliers, all with an AU-presence) and has a documented process for the appointment of suppliers.

To the extent that Wingate enters into significant supply contracts or engages suppliers in categories with higher inherent modern slavery risk, Wingate considers modern slavery risk as part of its supplier onboarding and due diligence processes, including by making appropriate enquiries about supplier operations, labour practices, subcontracting arrangements and policies.

Where appropriate, Wingate may include modern slavery provisions in significant supply contracts, including representations, warranties, undertakings, notification obligations and audit or information rights proportionate to the nature of the supplier relationship and risk profile.

4.5 REMEDIATION

If Wingate becomes aware of potential modern slavery practices occurring in its operations or supply chains, it will take appropriate steps to assess the matter, engage with relevant stakeholders and determine proportionate remediation or mitigation actions. This may include escalation to Legal and Compliance, supplier engagement, contractual remedies, reporting through whistleblower or incident channels, and, where appropriate, referral to relevant authorities or specialist support services.

5 How Wingate assesses the effectiveness of such actions

During the reporting period, the modern slavery regime sat within the oversight of Wingate's Risk & Compliance Committee (**RCC**), which is responsible for overseeing risk and compliance activities at Wingate, other than those reserved for the Wingate Board or other board committees.

This Modern Slavery Statement (**Statement**) has been diarised for annual review by the Wingate Legal & Compliance Team.

Modern slavery has been included in Wingate's Risk Register.

Wingate assesses the effectiveness of its actions through annual review of this Statement, periodic consideration of modern slavery within compliance reporting, review of any incidents or whistleblower reports, consideration of supplier onboarding and due diligence outcomes, and monitoring of regulatory developments and guidance relevant to modern slavery risk management.

6 The process of consultation by Wingate

Wingate consults with representatives of its key business units, corporate office and relevant controlled entities, as appropriate, to support the preparation and annual review of this Statement. This consultation is designed to confirm the accuracy of the description of Wingate's structure, operations and supply chains, identify any material changes in modern slavery risk, and consider whether existing controls remain appropriate. Those representatives are asked to:

a) review and confirm relevant information about Wingate's operations, products, supply chains, suppliers and risk controls;
b) provide input on any material changes during the reporting period; and
c) support the annual review and updating of this Statement before endorsement by the Board.

7 Other relevant information

Following Wingate's acquisition by CapitaLand Investment, Wingate has changed its modern slavery reporting period to align with the reporting cycle of the CapitaLand Investment group. As a result, this Statement covers a transitional reporting period of 1 July 2024 to 31 December 2025, rather than Wingate's previous reporting period. This change is administrative in nature and does not alter Wingate's approach to identifying, assessing and addressing modern slavery risks in its operations and supply chains.

This Statement has been approved by the Board of Directors of CLII Waratah Pty Ltd, being the principal governing body of an entity in a position to influence or control each of the reporting entities covered by this statement, in accordance with section 14 of the *Modern Slavery Act 2018* (Cth).

Juan Jose Lopez Manas Navarro
Director of CLII Waratah Pty Ltd