

AVID PROPERTY GROUP'S MODERN SLAVERY STATEMENT

For the Reporting Period: 1 July 2024 – 30 June 2025

This statement is made pursuant to the **Australian Modern Slavery Act 2018 (Cth)**. It outlines the steps taken by AVID Property Group Holdings Pty Ltd (AVID) during the reporting period to identify, assess, and address the risks of modern slavery in our operations and supply chains.

INTRODUCTION

AVID recognises that modern slavery is a serious global issue and is dedicated to working with our stakeholders to identify and mitigate any risks of modern slavery within our sphere of influence.

OUR COMMITMENT TO THE COMMUNITY

AVID Property Group (AVID) is dedicated to creating thriving communities in Australia's key growth markets with a strong commitment to product innovation, sustainability, affordability and lifestyle excellence. Upholding human rights and promoting ethical labour practices are integral to our core values of authenticity and our community-mindedness.

Throughout 2025, AVID has continued to monitor, identify and mitigating modern slavery risks within our supply chain. We do this through our policies, ongoing risk assessment and education across relevant areas of our business and the key suppliers we engage with.

Our partnership with the Property Council of Australia (PCA) and consultancy Informed 365 Pty Ltd is core to our compliance with modern slavery laws. We continue to use the PCA online supplier portal to facilitate appropriate review and reporting processes in our business.

AVID PROPERTY GROUP AND ITS STRUCTURE, OPERATIONS AND SUPPLY CHAINS

The reporting entity is AVID Property Group Holdings Pty Ltd (ACN 608 054 833).

As a leading and diversified residential community developer, AVID currently oversees a portfolio of 69 projects located in prime near-city and high-demand regional areas across the eastern seaboard of Australia. Over the past 18 years, the Group has delivered 75,000 homes to market, generating a revenue pipeline of \$4.9 billion. AVID's extensive holdings include broadacre land developments, master-planned communities, completed house and land packages and apartments and more recently, the development of land lease communities.

AVID is committed to maintaining high standards of corporate governance and ethical conduct. The organisation is guided by a Board of Directors, Executive Committee and Management Team comprised of some of Australia's most accomplished and forward-thinking leaders in property development and asset management. Together, they play a pivotal role in overseeing AVID's governance framework and ensuring strong organisational performance.

The Board and its Committees maintain rigorous and consistent oversight of the organisation's operational and financial performance. A commitment to ethical conduct and compliance is embedded in the company's governance framework, supported by a suite of policies that are regularly reviewed and updated by the Board and its Committees to ensure alignment with evolving corporate governance standards and regulatory requirements.

Graphic 1: AVID's Corporate Governance Structure



Our key policies relevant to modern slavery are:-

- Anti-Slavery Policy;
- Anti-Bribery and Anti-Corruption Policy;
- Whistleblower Policy;
- Suspicious Matters Reporting Policy;
- Risk Management Policy and Framework;
- Code of Conduct Policy; and
- Grievance Handling Policy.

WHAT ARE THE RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS?

We acknowledge that modern slavery is a complex global challenge, particularly in the context of business operations and global supply chains. Within the property and construction industry, risks stem from the reliance on agency and subcontracted labour, the employment of a substantial migrant workforce, the pressures of strict cost and time constraints, and the need to understand multi-tiered supply chains.

Although the disruptions caused by COVID-19 have eased, the property and construction industry continues to face persistent challenges in 2025. Long term effects on supply chains, including material shortages, labour constraints and price volatility, remain persistent challenges affecting the sector.

AVID's risk management framework follows the internationally recognised ISO 31000 Risk Management – Principles and Guidelines, ensuring a structured and effective approach to identifying and addressing risks. It is further aligned with Principle 7 of the Australian Securities Exchange (ASX) Corporate Governance Principles, which emphasises the need for robust processes to identify, assess and mitigate risks.

AVID's risk management framework is built to mitigate the inherent risk areas in the sector, being:

- Subcontracted and labour hire labour within site operation and construction;
- Material supply chains connected to high-risk countries or sectors; and
- Small trade suppliers with limited governance systems.

Throughout the 2025 reporting period, AVID maintained a strong focus on due diligence screening measures for all new suppliers, reflecting its ongoing commitment to ethical and transparent practices. To strengthen compliance, key modern slavery related questions were integrated into AVID's onboarding software, LinkSafe, providing a more effective framework for supplier evaluation.

Suppliers were encouraged to complete the annual questionnaire on the PCA online portal, with follow-up actions undertaken to ensure full participation and accountability. Additionally, AVID's Procurement Guidelines were updated to include specific references to the Company's Modern Slavery Policy and associated due diligence processes, reinforcing a consistent commitment to ethical standards. AVID is of the view that the suppliers evaluated present a low risk of modern slavery within AVID's supply chain and operations, reflecting our commitment to maintaining ethical and transparent practices.

RESIDENTIAL PROPERTY DEVELOPMENT

The delivery of residential property developments is outsourced to highly skilled and reputable construction partners, recognised as industry leaders for their expertise and reliability. Our primary focus in this area is on the development of master planned communities, rather than individual built environments, ensuring comprehensive and sustainable neighbourhood designs.

Modern slavery risk in this area of our business remains low.

As head contractors, we engage subcontractors through a competitive selection process and formalise these engagements with clear agreements. Given the nature of our residential property development operations, our subcontractors predominantly source their services and materials locally within Australia. However, the reliance on labour hire companies within our supply chain represents a notable area of risk. As outlined elsewhere in this report, AVID actively manages and mitigates this risk through targeted strategies and oversight.

HOUSING CONSTRUCTION

Through our Villaworld Homes housing business, we construct residential homes across a range of developments along Australia's eastern seaboard. Our operations rely on a diverse range of trades, including many smaller businesses. While verifying the modern slavery practices of smaller suppliers can be challenging, we remain proactive in addressing these issues. We collaborate with the Housing Industry Association of Australia to educate the broader industry on the significance of modern slavery prevention. Additionally, we engage directly with our suppliers through targeted email campaigns to raise awareness and promote ethical practices within this segment of our supply chain, which is largely comprised of small businesses. Where practicable, we prioritise procuring Australian made and Australian owned building products and sourcing local trades and manufacturers near our development sites to support local economies and enhance supply chain transparency. We aim to limit international sourced material particularly in the high-risk categories of steel, aluminium, timber products and solar technology.

Our current assessment places the risk of modern slavery within our housing construction business as medium-low. This cautious evaluation reflects the wide variety of materials sourced from numerous suppliers and the reliance on a substantial cohort of local small businesses for labour and services. We remain committed to monitoring and addressing these risks as part of our ongoing efforts to uphold ethical and responsible practices.

CORPORATE OPERATIONS

We are committed to sourcing goods and services from a diverse network of Australian suppliers to support our corporate operations. This includes areas such as promotional goods, information and communication technology professional services and financial services. Based on our ongoing evaluations, the risk of modern slavery within this aspect of our operations is currently assessed as low.

WHAT ACTIONS HAVE WE TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS?

AVID employs a range of controls and due diligence measures to manage modern slavery risks within our supply chain. During the 2025 reporting period, AVID held meetings of the Modern Slavery Work Group and maintained communication with suppliers, requesting updated responses to the Modern Slavery questionnaire via the Property Council of Australia (PCA) online portal.

Additionally, we have conducted an analysis of our top suppliers by spend, confirming that all were Australian based companies with our Average Supplier Risk remaining in the “low” category. However, whilst our Average Supplier Risk remains low, we recognise that some indirect goods and services may originate from regions more vulnerable to modern slavery risks within our industry and despite there being no high risk suppliers within our top suppliers, we continue to implement measures requiring direct suppliers to notify us of any potential or actual breaches within their own supply chains.

Whilst our supplier engagement rate remains steady our response rate to the FY25 survey has decreased from previous years and suppliers who have previously completed the survey have either not commenced the survey or have partially completed the survey. This appears to be as a result of the lengthy and complex nature of the survey. We have commenced remediation the low response rate by contacting our key suppliers to request completion of the survey in order to ensure that our risk assessment remains accurate.

Graphic 2: Modern Slavery Compliance Cycle



HOW DO WE MANAGE AND MITIGATE MODERN SLAVERY RISK?

The Modern Slavery Working Group has remained dedicated to managing and mitigating Modern Slavery risk by: engaging with suppliers on modern slavery issues, both through the PCA portal and direct communication, as well as collaborating with consultants to review supplier responses to the PCA questionnaire and identify necessary actions. The group has also ensured that senior management sets a strong ethical tone for the business, raising awareness among team members and business partners about AVID’s commitment to addressing modern slavery. Additionally, binding undertakings regarding modern slavery compliance have been incorporated into AVID’s standard supplier agreements to reinforce accountability and ethical practices.

HOW DO WE ASSESS THE EFFECTIVENESS OF ACTIONS BEING TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS?

AVID’s Modern Slavery Working Group is the designated committee responsible for ensuring compliance with modern slavery obligations. The group evaluates the completion

rates of the of the PCA questionnaire by suppliers and identifies higher risk suppliers for greater scrutiny. Finally, the group is also accountable to ensure continuous improvement and monitoring of our compliance activities.

HOW DO WE ENGAGE WITH OUR SUPPLY CHAIN?

AVID collaborates with the PCA and numerous leading property and construction companies, leveraging the PCA online portal to evaluate suppliers in line with a modern slavery legislation requirements. The online portal centralises the reporting process, enabling suppliers to efficiently share relevant information with property companies while also serving as a valuable tool for industry-wide training and raising awareness about modern slavery issues.

To further support this initiative, AVID encourages its suppliers to enhance their understanding of modern slavery issues by accessing the various educational resources available through the PCA online portal. AVID's priorities include harmonising the AVJenning's business approach to modern slavery and maintaining the awareness of modern slavery issues in our supplier base.

HOW DO WE ENGAGE WITH THE ENTITIES WE OWN AND CONTROL?

The operations and supply chains of AVID are overseen and managed by the AVID Property Group Board. The CEO and Executive Management team are accountable to the Board for the day-to-day management of all issues in relation to the operations and supply chains of the business.

Modern slavery compliance is an integral responsibility of the Risk Audit Committee. This committee is tasked with monitoring the Group's compliance with applicable laws, regulations and the company's code of conduct, ensuring ethical and compliant practices are maintained across all areas of the business.

The entities covered by this statement have been consulted with the Modern Slavery Working Group and the directors of the subsidiary companies have reviewed and approved this statement as part of the consultation process.

This Statement was approved by the Board of AVID Property Group Holdings Pty Ltd (ACN 608 054 833) on 10 December 2025.

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Cameron Holt
Director and CEO
AVID Property Group Holdings Pty Ltd