# **FY22 Modern Slavery Statement**

For Financial Year ending 31 March 2022

## **Reporting Entity**

This statement is submitted under section 13 of the Modern Slavery Act 2018 (Cth) for the Shimano Office Trust (ABN 33 592 354 043). This Statement has been prepared by the Trustee, Perpetual Corporate Trust Limited (ACN 000 341 533) and approved by the board of directors of the Trustee on 28 September 2022.



Richard Mccarthy

Director

Perpetual Corporate Trust Limited

## Consultation

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

## Structure, Operations and Supply Chain

## Structure

Shimano Office Trust is domiciled in Australia and has been in operation since 2012. Shimano Office Trust invests in the Charter Hall Office Trust. The Trust owns no real property and has no employees.

### **Operations**

The primary operation of Shimano Office Trust is the investment in Charter Hall Office Trust, which is a property fund with a portfolio of high-quality commercial office properties across Australian capital cities. Shimano Office Trust is managed by the trustee Perpetual Limited's division Perpetual Corporate Trust.

## **Perpetual Corporate Trust (PCT)**

Provides a broad range of fiduciary and agency products to the debt capital markets and managed funds industries in Australia and Singapore. Perpetual Digital, PCT's innovation company, encompasses data services, industry roundtables and our Perpetual Intelligence digital platform, which supports the banking and financial services industry. In providing these services, Perpetual Corporate Trust utilises a number of entities in the Perpetual Group, including PTCo, Perpetual Corporate Trust Limited, Perpetual Trust Services Limited, The Trust Company (RE Services) Limited, The Trust Company Limited, The Trust Company (Australia) Limited and Perpetual (Asia) Limited. In addition, the data and analytics services within Perpetual Digital are provided by a few entities in the Perpetual Group including Perpetual Nominees Limited, Perpetual Digital Pty Limited, Perpetual Roundtables Pty Limited and Laminar Capital.



#### Investments

The Trust's Assets under Management were in commercial real estate. The account domicile was concentrated in Australia.

#### Supply chain

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

### Procurement categories for service providers include:

- Investment management services
- · Professional services, including an accountant, auditor and tax agent
- Custodian

## **Modern Slavery Risks**

The Trustee understands that modern slavery risk can occur in operations and supply chains. The Trustee considers the risk assessment a critical process to identifying the inherent risk of modern slavery across Shimano Office Trust.

## Defining modern slavery risks

Modern Slavery is an umbrella term. Essentially, it refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, abuse of power, or deception. It is largely invisible, in part because it disproportionately affects the most marginalised. The Trust recognises that COVID-19 has exacerbated modern slavery risks for people in vulnerable situations.

Modern slavery includes human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.<sup>3</sup> When thinking about the risk of modern slavery practices, this means the potential for the Trust to cause, contribute to, or be directly linked to modern slavery through the Trust's operations or supply chain.

#### Risk assessment methodology

In FY22, the Trustee collected information on Shimano Office 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 FY22 risk assessment conducted by the Trustee revealed that the investment sector of the trust is considered to have high inherent risk, as they are part of the property and construction industries. The below information summarises the risks in these industries. The approach to due diligence and assessment is informed by this risk profile.



<sup>&</sup>lt;sup>1</sup> The Minderoo Foundation, 2018. <u>The Global Slavery Index 2018</u>, 7,2.

<sup>&</sup>lt;sup>2</sup> Obokata, Tomoya, United Nations, 2020. Impact of the coronavirus disease pandemic on contemporary forms of slavery and slavery-like practices

<sup>&</sup>lt;sup>3</sup> As defined in the Australian Modern Slavery Act 2018 (Cth)

#### Investment Sector Inherent Risk Profile

Office Buildings The property and construction industries have a high 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

geographies4.

### **Supply Chain**

The Trustee's FY22 risk assessment did not identify any high-risk service providers.

## **Actions to Address Modern Slavery Risks**

### **Due Diligence**

#### Risk assessment

The Trustee's annual risk assessment was conducted to assess Shimano Office Trust's inherent modern slavery risks.

#### Investments

The Trustee of Charter Hall Office Trust is Charter Hall Wholesale Management Limited. Charter Hall Wholesale Management Limited is a subsidiary of Charter Hall Limited. Charter Hall Limited is required to report under the Modern Slavery Act 2018 (Cth). Their statement is prepared and issued by Charter Hall Limited (ABN 57 113 531 130) and Charter Hall Funds Management Limited (ABN 31 082 991 786 AFSL 262861) as Responsible Entity of the Charter Hall Property Trust (together, the Charter Hall Group).

Charter Hall's due diligence includes risk assessment and supplier onboarding, human rights and modern slavery framework and working group, grievance mechanism, industry engagement and training. When engaging with the property and construction sector, the Charter Hall Group screens for modern slavery with general contractors. The Charter Hall Group predominately manages real estate assets in operations – they screen their property and operations management services for modern slavery. The Trustee has reviewed Charter Hall's modern slavery due diligence and is confident that they are addressing their modern slavery risks sufficiently.

### **Supply Chain**

Although the FY22 risk assessment did not identify any high-risk service providers, the majority of service providers are required to report under the Modern Slavery Act 2018 (Cth). Therefore, they are obligated to identify and address modern slavery risks in their operations and supply chains. As a result, they have modern slavery due diligence processes in place.

## **Measuring the Effectiveness of Actions**

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

#### FY22 progress:

- Mapped Shimano Office Trust's supply chain to identify the different sectors their service providers operate in
- Conducted annual risk assessment to determine inherent modern slavery risks

<sup>&</sup>lt;sup>4</sup> KPMG and Australian Human Rights Commission, 2020. <u>Property, Construction & Modern Slavery: Practical responses for managing risk to people</u>, 9.



## **Actions for FY23**

• Monitor emerging global trends in modern slavery and include anything relevant for the FY23 risk assessment

# **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
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 2
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 3
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 3
Describe the process of consultation and any entities the reporting entity owns or controls	Consultation, Page 1

