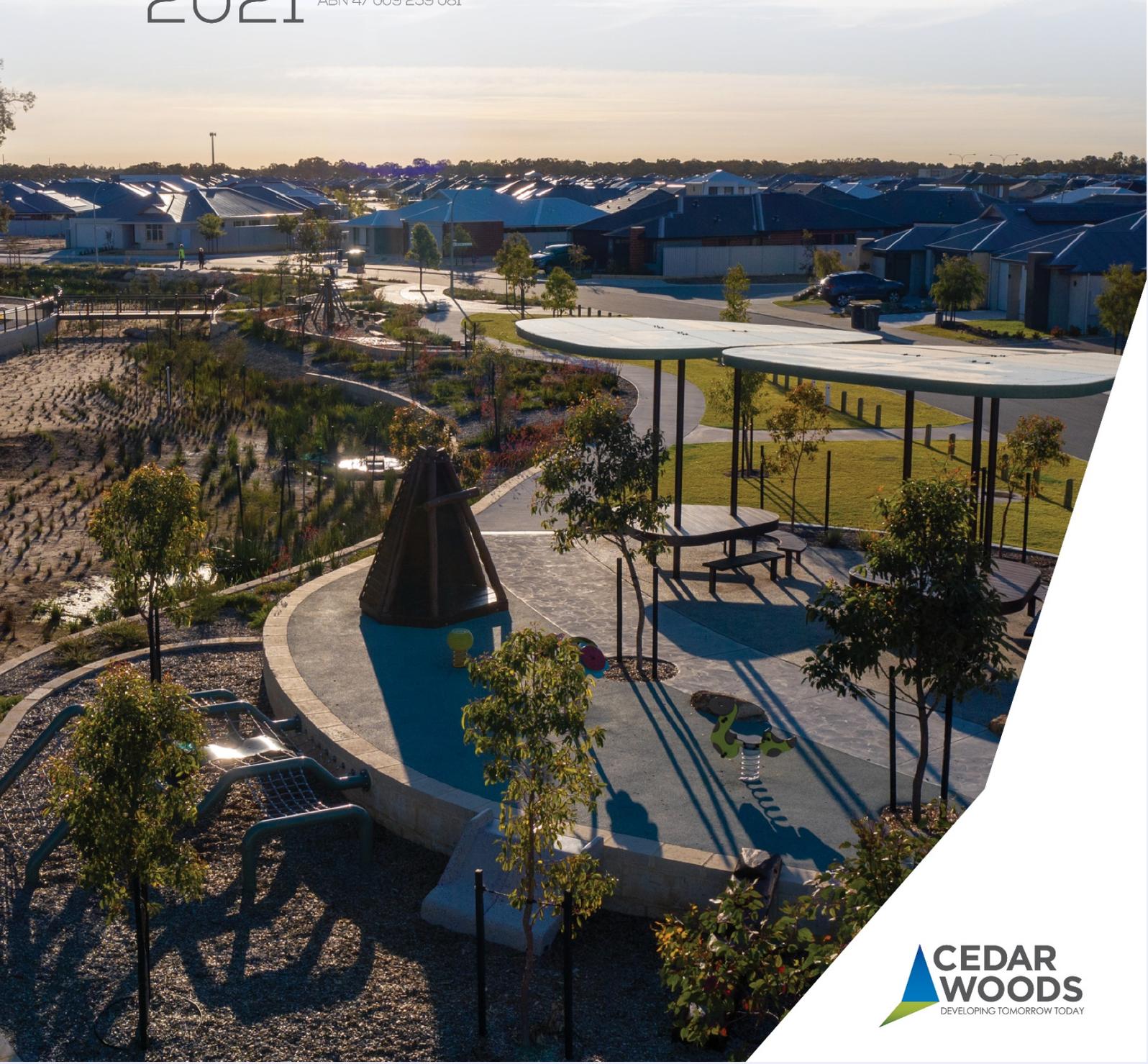


MODERN SLAVERY REPORT

2021

Cedar Woods Properties Limited
ABN 47 009 259 081





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CEDAR WOODS IS
COMMITTED TO LIMITING
THE RISK OF MODERN
SLAVERY OCCURRING
WITHIN ITS BUSINESS.

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MODERN SLAVERY STATEMENT 2021

This statement (Statement) is made by Cedar Woods Properties Limited (Cedar Woods) and covers the activities of Cedar Woods and all of its subsidiaries as at 30 June 2021 as set out in its 2021 annual financial report.

Cedar Woods is committed to limiting the risk of modern slavery occurring within its business, infiltrating its supply chain or through any other business relationship.

This Statement is being made in compliance with the Modern Slavery Act 2018 (Cth) (Modern Slavery Act). This Statement covers the reporting period from 1 July 2020 to 30 June 2021.

The purpose of this Statement is to outline Cedar Woods' approach to ensuring that its business is conducted within a framework that minimises modern slavery risks in its operations and supply chain.

MODERN SLAVERY

Modern Slavery is defined by the Modern Slavery Act 2018 and includes people trafficking, forced and compulsory labour and certain other forms of human exploitation, such as some forms of child labour.

Tackling modern slavery requires the company's employees and other stakeholders to play a part and remain vigilant to the risk in Cedar Woods' business and business relationships.

STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Cedar Woods is a national developer of residential communities and commercial properties and its operations are wholly conducted within Australia.

The company has supply chains that predominantly include, but are not limited to:

- Consultancy services
- Building and construction services, including civil works
- Financial and insurance services
- Technology (hardware and software)
- Maintenance services
- Marketing, sales agents and conveyancing
- Professional services
- Office accommodation and related services

RISKS OF MODERN SLAVERY PRACTICES

Due to its internal policies and compliance, the risk of any modern slavery practices within the company's own operations is minimal.

The Company has approximately 90 employees, primarily skilled professionals, who are all based in Australian capital cities.

They do not hold roles or positions that are at high risk or vulnerable to slavery or human trafficking. Cedar Woods has systems and processes in place to ensure that all employees are recruited with the full knowledge of the role that they will undertake, that appropriate checks are undertaken to ensure that employees are over the age of 18 and that employees have the appropriate rights to work in Australia and are paid a minimum wage or above for the work that they do.

The property development sector within Australia is not traditionally an industry exposed to risks of forced labour or human trafficking, and most of the company's suppliers are Australian-based, long term suppliers where the risk of modern slavery is low. All of the Company's material suppliers (determined by value of expenditure) are based in Australia.

We identify that the greatest risk within the supply chains lies downstream of our immediate suppliers and as such we endeavour to ensure that our

suppliers are made aware of our modern slavery policy and we implement such contractual clauses required to reduce or remove risk of modern slavery and ensure that our suppliers undertake to ensure that they, and their suppliers, comply with the Modern Slavery law in Australia.

MODERN SLAVERY GOVERNANCE AND PROCESSES

Cedar Woods has executives and senior managers who are responsible for human resources, risk and legal compliance. Those persons report to the Managing Director who in turn reports to the Audit and Risk Management Committee and the Board.

Cedar Woods has formal policies in place (applicable to Directors, employees and consultants) that promote ethically and legally compliant business conduct, both internally and within the supply chain including:

- Code of Conduct
- Modern Slavery Policy
- Whistleblower Policy
- Anti-Bribery and Corruption Policy
- Environmental Management & Climate Change Policy

The following procedures are implemented pursuant to the company's Modern Slavery Policy:

- The company maps its operations and supply chains to determine which parts of the business and supply chains are most at risk from modern slavery, so efforts can be focused on the areas most at risk;
- Informed by risk assessments, the company engages with existing and new suppliers in order to inform them of the company's policy and in order to gain an understanding of the measures they have in place to ensure that modern slavery is not occurring in their own businesses
- Our vendor onboarding procedure seeks to identify any particular modern slavery risks associated with material suppliers
- Our contractual documentation incorporates specific requirements with respect to the prohibition of modern slavery and requires our suppliers to maintain similar requirements with their own suppliers

The company regularly conducts assessments of its suppliers under a number of performance criteria, including that of enforcement of anti-slavery practices. The company will discontinue engagement with suppliers that consistently fail to meet performance criteria.



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CEDAR WOODS
EMPLOYEES DO
NOT HOLD ROLES
OR POSITIONS THAT
ARE AT HIGH RISK
OR VULNERABLE TO
SLAVERY OR HUMAN
TRAFFICKING.

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CEDAR WOODS HAS REQUESTED THAT SUPPLIERS REQUIRED TO REPORT UNDER THE MODERN SLAVERY ACT PROVIDE THEIR OWN MODERN SLAVERY STATEMENTS.

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PROCEDURES UNDERTAKEN IN REPORTING PERIOD

During FY21 Cedar Woods performed a risk review of material suppliers in its supply chain. The materiality was measured by value of expenditure and covered suppliers that collectively represented approximately 81% of the procurement expense of the group.

The review included assessing under a number of criteria, the risk profile of each material supplier and the measures taken by them in ensuring that Modern Slavery is addressed in their own operations and supply chains.

Cedar Woods also requested that suppliers required to report under the Modern Slavery Act provide their own Modern Slavery Statements for review and has engaged with individual material suppliers on an as-needed basis to review and discuss their progress with implementing anti-modern slavery practices in their own organisations.

On a test basis, Cedar Woods requested evidence of the risk management processes that the suppliers implemented and considered their effectiveness.

Cedar Woods conducts bi-annual monitoring as well as undertaking comprehensive risk assessments (including Modern Slavery risks) of new material suppliers that are on-boarded.

Cedar Woods allocates a score to each supplier as part of its bi-annual monitoring and identifies and reports any significant Modern Slavery risks discovered using the onboarding checklist. Cedar Woods uses this information to assess the effectiveness of actions taken to address modern slavery risks.

Cedar Woods considers the approach adopted in FY21 was effective in identifying and addressing potential modern slavery risks in its supply chain, and has increased the company's knowledge of the processes employed by its suppliers to combat modern slavery. No specific remediation activities were noted as being required and no incidence of Modern Slavery was encountered. The analysis reveals that suppliers are each at a different level of maturity in adopting modern slavery practices, depending on their size, operations and requirement to report under the Modern Slavery Act.

We are committed to ensuring that over the next

reporting period we continue to develop our means of assessing our suppliers as they progress their own modern slavery risk programs.

COMMUNICATION AND EMPLOYEE AWARENESS TRAINING

Senior Management has ensured that relevant employees receive adequate training on the policy and any supporting processes applicable to their role.

BREACHES OF POLICY

The breach of Cedar Woods Modern Slavery policy by an employee, director or officer of the Company may lead to disciplinary action being taken. Serious breaches may be regarded as gross misconduct and can lead to immediate dismissal.

Any employee who reports a breach under the policy will be entitled to the protection under the company's whistle-blowing policy.

CONSULTATION WITH OTHER ENTITIES OWNED OR CONTROLLED

Cedar Woods controls a number of wholly-owned subsidiary companies for financial and legal reasons. The procurement processes and systems are implemented on a group-wide basis under the one system of control and follow the policies set by the reporting entity. Cedar Woods and the subsidiaries have common office holders who were consulted in the development of the statement and reviewed this statement.

APPROVAL OF MODERN SLAVERY STATEMENT

The policy statement is approved by the Board of Directors of Cedar Woods Properties Limited.

Signed,



Nathan Blackburne
Managing Director



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