



Aspen Group Limited - Modern Slavery Statement

Aspen provides quality accommodation on competitive terms to Australian households. Our core customer base is the approximate 40% of households with income of less than \$100,000 per annum who can afford to pay no more than about \$400 per week to rent a home. Aspen’s fully integrated platform encompasses operations, asset management, development, and capital management. We provide a broad spectrum of products and services to our customers under different lease types and terms.

Aspen Group recognises its responsibility to minimise modern slavery risks within its business, operations and supply chain. This statement is made by Aspen Group, as outlined in our structure & operations, and sets out the steps we have taken to prevent modern slavery.

Our Structure & Operations

Aspen Group comprises the stapled head entities Aspen Group Limited and Aspen Property Trust. Aspen Group Limited is a company with a Board of Directors. Aspen Property Trust is a trust governed by a Responsible Entity, Evolution Trustees Limited which is independent from Aspen Group Limited and has its own Board of Directors.

Aspen Group Limited operates Aspen Group on a day to day basis. This statement relates to Aspen Group Limited and its subsidiaries listed below:

	ACN		ACN
Parent entity			
Aspen Group Limited	004 160 927		
Subsidiaries			
Aspen Funds Management Limited	104 322 278	Realise Residential WA 9 Pty Ltd	652 741 878
Aspen Living Villages Pty Limited	114 904 415	Realise Residential WA 10 Pty Ltd	652 741 903
Aspen Property Developments Pty Limited	100 495 145	Realise Residential WA 11 Pty Ltd	652 741 912
Caversham Property Development Pty Ltd	009 135 488	Realise Residential WA 12 Pty Ltd	652 741 930
Realise Residential WA Pty Ltd	636 581 836	Realise Residential WA 13 Pty Ltd	652 741 967
Realise Residential WA 2 Pty Ltd	636 609 339	Realise Residential WA 14 Pty Ltd	652 742 035
Realise Residential WA 3 Pty Ltd	636 609 428	Realise Residential WA 15 Pty Ltd	652 742 053
Realise Residential WA 4 Pty Ltd	636 609 482	Realise Residential WA 16 Pty Ltd	652 742 062
Nest QLD Pty Ltd	638 072 349	Realise Residential WA 17 Pty Ltd	652 742 080
Footprint MB Pty Ltd	644 979 788	Realise Residential WA 18 Pty Ltd	668 217 196
Digs Accommodation Vic Pty Ltd	651 725 423	Hindmarsh Marina (SA) Pty Ltd	620 945 548
Realise Residential WA 5 Pty Ltd	652 741 681	Coorong Quays Pty Ltd	621 182 465
Realise Residential WA 6 Pty Ltd	652 741 789	Tavern HI Pty Ltd	621 182 867
Realise Residential WA 7 Pty Ltd	652 741 841	Cove HI Pty Ltd	621 219 645
Realise Residential WA 8 Pty Ltd	652 741 869	Realise Retirement WA 1 Pty Ltd	666 488 035
		Aspen Whitsunday Shores Pty Limited	121 656 988

Our Supply Chain

Aspen Group Limited is committed to working in an ethical manner and display a high level of integrity within all business dealings and relationships.

Across the business, goods and services are purchased or engaged by different members of the business. Goods and services for our rental properties are purchased or engaged by dedicated Property Managers or head office employees. We engage external contractors for our development projects and the engagement is overseen by our Asset Management and Development managers. Goods and services for our head office are engaged or purchased by our head office employees. Most goods and services we use are sourced through our database of established suppliers and subcontractors.

Modern slavery risks in our operations & supply chains

Following consultation, a modern slavery risk assessment of our operations and supply chains of the key risk areas identified was completed.

Due to the nature and location of Aspen's business and property portfolio we consider the risk to be low. However, we acknowledge that the risks of modern slavery may be heightened in some of our group's supply chains and operations as a result of geographical location of some of our suppliers and the materials used in products supplied to us. In particular, products or materials sourced in South-East Asia. It is also acknowledged that being in the construction industry, there is a risk of being directly linked to modern slavery practices due to the labour used by other businesses on site.

Addressing Modern Slavery Risks and its effectiveness

Over this reporting period, Aspen Group Limited has made a commitment to significantly progress the actions we take to address modern slavery risks associated with our operations and supply chains.

To ensure modern slavery risks are mitigated in our operations and supply chains, we have implemented and enforced effective systems and controls. These include:

- reviewing and where necessary updating internal policies and procedures
- introducing a notice specifically related to modern slavery in requests for tenders & quotations
- engaging more with subcontractors and suppliers to strengthen the qualification process

Aspen Group has a strong focus on improving staff and subcontractor awareness of modern slavery risks through awareness raising training and provide employees and subcontractors with a safe method to report any instance or suspected instance of improper conduct, including but not limited to modern slavery through our whistle-blower policy.

At this early stage, we are unable to fully assess the effectiveness of our implementation. We will continuously assess the effectiveness of our effort in identifying and managing these risks by monitoring our actions and outcomes and conducting regular internal governance and processes. Results of these evaluations will be used to strengthen our actions and enhance our response to modern slavery.

Reporting and Compliance

In developing this modern slavery statement, Aspen engaged with key business areas responsible for procurement, risk and legal. Given the largely centralised nature of our business, consultation is integrated in our operating model throughout the year. Furthermore, Aspen ensures that there is commonality on each of the boards of the entities it owns and controls, such that the executive at every level of the business is informed and are across our group level systems and processes.

Any instances of modern slavery or human trafficking identified within Aspen Group Limited, or its supply chains must be reported immediately to management or the designated compliance officer. Reports will be investigated promptly, and appropriate remedial action will be taken in accordance with applicable laws and regulations.

Review and Updates

The modern slavery program will be reviewed periodically to ensure its effectiveness and compliance with Australian legislative requirements and international standards. Updates may be made as necessary to reflect changes in laws, regulations, or best practices related to modern slavery and human trafficking.

This Statement has been approved by the board of directors of Aspen Group Limited.

Authorised on behalf of the Board

A handwritten signature in black ink, appearing to read 'David Dixon', with a horizontal line extending to the right.

David Dixon

Joint Chief Executive Officer

Aspen Group Limited