



MODERN SLAVERY STATEMENT

Exemplar Health (Melton) Pty Limited
(ACN 670 008 527)
as trustee of the
Exemplar Health (Melton) Trust

Financial Year 2025

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1. Identifying the Entity

This Modern Slavery Statement (Statement) is prepared by Exemplar Health (Melton) Pty Limited (ACN 670 008 527) as trustee of the Exemplar Health (Melton) Trust (Exemplar Melton) and relates to the financial year 1 July 2024 to 30 June 2025.

Exemplar Melton is a Reporting Entity for the purposes of the Modern Slavery Act 2018 (Cth). Exemplar Melton is committed to having processes in place to minimise the risk of modern slavery in its business operations and supply chain.

Exemplar Melton is committed to ethical, sustainable and socially responsible procurement and we expect the same high standards in the operations and supply chains.



2. Structure, Operations and Supply Chains

2.1 Structure

Exemplar Melton is a special purpose vehicle, formed to enter into a Project Deed with the Minister for Health Infrastructure on behalf of the Crown in right of the State of Victoria (the **State**) to deliver the New Melton Hospital Project in Cobblebank, Victoria (**Project Deed**).

Exemplar Melton is held by its two equity investors in equal shares:

- Melton Hospital B.V. (KVK No. 94 935 327) of Regulierenring 35, 3981LA Bunnik, the Netherlands (Invesis Investor); and
- LL Melton Pty Limited (ACN 680 519 046) as trustee of the LL Melton Trust of Level 13, 95 Pitt Street, Sydney NSW 2000.

Exemplar Melton does not own or control any other entities and does not have any employees. Exemplar Melton has engaged Capella Management Services Pty Limited (ACN 127 727 842) (**CMS**) to provide various services to Exemplar Melton, including contract administration services and staff.

Exemplar Melton's CEO and staff are employed by Capella Corporate Services Pty Limited (ACN 127 727 566) (**CCS**, formerly known as Capella Capital Lendlease Pty Limited) and seconded to Exemplar Melton pursuant to secondment agreements (**Secondment Agreements**). Exemplar Melton's CEO reports to the Board, which is made up of Directors appointed by each of the equity investors. The Exemplar Melton secondees, in turn, report to the Exemplar Melton CEO.

The Secondment Agreements require the CEO and Exemplar Melton staff to comply with various Exemplar Melton's procedures and policies. Exemplar Melton also drew on the systems and processes of the Lendlease Group during the reporting period as part of the services provided by CMS under the MSA modern slavery risk supplier assessment and mitigation measures, noting CMS forms part of Capella Capital, a business that operated within the Lendlease Group during the reporting period.



Artists Impression

2.2 Our Operations and Supply Chains

Exemplar Melton has been contracted by the State to design and construct the New Melton Hospital under a public-private partnership framework, including:

- design, financing, construction and commissioning of the Works, including at least 274 beds;
- an emergency department and an intensive care unit;
- maternity and neonatal services; and
- mental health services, radiology services and ambulatory care; and
- a new education and training hub for doctors and nurses in Melbourne's west.

More information regarding the New Melton Hospital Project can be found at [New Melton Hospital](#).

Exemplar Melton is party to the following key agreements (**Key Agreements**). The counterparts to the Key Agreements are based in Australia,

and the Key Agreements are the primary mechanisms through which Exemplar Melton operates.

- **D&C Contract** with Lendlease Construction (Southern) Pty Limited (ACN 002 625 130) (the **D&C Contractor**) to deliver the Development Activities (which include the design, manufacture, supply, construction, installation, commissioning and completion of the Works);
- **Services Contract (Hard FM)** with Honeywell Limited (ACN 000 646 882) to carry out the Services (building maintenance) over the Operational Phase (a 25-year term anticipated to commence in January 2026);
- **Services Contract (Soft FM)** with Compass Group Healthcare Hospitality Services Pty Ltd (ACN 114 320 615) to carry out the Services (cleaning, waste management, grounds and gardens maintenance, pest control, materials handling and car park management) over the Operational Phase;

- **Management Service Agreement** with CMS under which CMS provides services to Exemplar Melton including:

- procurement of staff for secondment to Exemplar Melton;
- financial reporting including preparation of monthly reporting, annual financial reports and tax return preparation;
- recruitment, establishment of business systems, IT systems and bank accounts, and arranging office space; and
- executive and compliance support.

Exemplar Melton procures very few services or goods outside of the Key Agreements, and accordingly has very limited direct supply chain exposure.

3. Modern Slavery Risks in Our Operations and Supply Chains

In this reporting period the Project activities were focussed on design development with limited site-establishment works performed by the D&C Contractor.

During the reporting period Exemplar Melton utilised the Lendlease Group's supply chain and modern slavery assessment tools to perform a risk assessment of Exemplar Melton's supply chain. In doing so, the following key risk factors were taken into account:

- the industry sector of its operating supply chain;
- the types of products and services provided; and
- the business models of its key contractors.

The risk assessment identified a low risk in relation to Exemplar Melton, primarily due to Exemplar Melton's limited direct supply chain, which is almost entirely comprised of large Australian-based entities which are themselves reporting entities under the *Modern Slavery Act 2018* (Cth). Exemplar Melton is multiple steps removed from the direct manufacture of raw material inputs that are utilised for the New Melton Hospital Project. Due to this, Exemplar Melton's position in the contractual structure and its counterparties, Exemplar Melton relies to a significant degree on the risk screening due diligence, risk control mechanisms and declarations of our direct suppliers to confirm their management of upstream modern slavery risks.

Risk assessments undertaken by Exemplar Melton identified the following risk areas.

[The key modern slavery risk areas for Exemplar Health are set out below](#)

D&C Contractor Risk

Exemplar Melton understands there may be elevated exposure to modern slavery risks in the D&C Contractor's supply chain as the D&C Contractor is both subcontracting works and procuring materials through a complex supply chain.

The construction sector has a history of using low-skilled, manual, often temporary migrant labour, which increases its exposure to the risks of modern slavery-type practices. The risk of modern slavery in this sector is essentially related to labour in the supply chain, and or labour engaged in the construction process.

Transparency of labour practices in the fabrication of materials and components used in construction offshore is challenging, with long and diverse supply chains, not readily visible to the end product user, distributor or installer.

For direct operations, while much of the construction labour used in Australia is unionised, and a licensing regime operates for labour hire providers in Victoria under the Labour Hire Licensing Act 2018 (Vic), the indirect use of site labour, utilising low-skilled casual manual workers recruited by smaller sub-contractors either informally or as a result of the general contractor remains an area of priority. Having the requisite oversight to ensure due diligence in labour recruiting processes are carried through by a principal contractor is a high priority risk to monitor and includes monitoring:

- lawful methods for sourcing, engaging and paying workers in accordance with industry awards and related entitlements;
- workers are of minimum legal age, and legally permitted to work;
- conditions of work that are formally and clearly conveyed to workers whose first language is not English or whose knowledge of employment rights may be limited;
- evidence of appropriate documentation showing workers' correct pay rates and any entitlements, including payslips, frequency of pay and employment contract; and
- a non-retaliatory grievance pathway for workers to raise concerns confidentially and a process for remediation.

Services Contractor Risk

Services Contractor risk is currently minimal given the operations phase has not yet commenced and the Services Contractors' role is limited to the provision of advisory services.

We note that the provision of some services, such as cleaning, asset maintenance, materials handling and security, exist in a price competitive low margin market, potentially leading to a reliance on low-skilled migrant labour for viability. Accordingly, additional oversight on the engagement of these types of service providers by the Services Contractors will be prioritised and will include targeted risk screening during the engagement process.

Management Services Risk

Under the Management Services Agreement, CMS provides management services to Exemplar Melton. These include financial management of Exemplar Melton (financial reporting, payment of invoices and accounts receivable), financial modelling and the employment of Exemplar Melton staff. These services are provided directly by employees of CCS, with all employees being domiciled and employed in Australia under National Employment Standards.

Suppliers engaged by CMS during the reporting period in supporting delivery of these services were engaged in accordance with the relevant Lendlease Group procurement and due diligence applying to CMS during the reporting period.



4. Actions Taken to Assess and Address Modern Slavery Risks, including Remediation

During the reporting period, Exemplar Melton closely analysed the approaches to the mitigation of modern slavery risk taken by the D&C Contractor and Services Contractors (together the **Key Contractors**). Exemplar Melton found that each of the Key Contractors takes a risk-based approach to this process, as reported in their respective Modern Slavery Statements.

In relation to the D&C Contractor, Exemplar Melton undertakes ongoing assessment of risks by monitoring the monthly reporting related to the use of resources, industrial relations and workplace health and safety standards.

Exemplar Melton requires the Key Contractors to demonstrate how they are addressing their modern slavery risks in a Modern Slavery Risk Management Plan, including through regular updates of these plans.

Going forward, Exemplar Melton will also implement a Modern Slavery Questionnaire, the results of which will assist Exemplar Melton and its Key Contractors to:

- identify and assess potential elevated modern slavery risks in Exemplar Melton’s supply chain;
- identify mitigation efforts to combat the risk of modern slavery in Exemplar Melton’s supply chain; and
- foster collaboration between Exemplar Melton and its Key Contractors in relation to supply chain issues, including understanding supplier verification procedures and internal policies and procedures, including workers’ labour conditions and workplace practices.

The Questionnaire will also assist in identifying specific risks or subcontractor engagement processes which require further targeted risk screening.

During the reporting period, Exemplar Melton staff complied with the following Lendlease Group policies, which respond to modern slavery risks

Key Lendlease Group Policies	Description
Environment Health and Safety	Sets up oversight and management of Environment Health and Safety and embedment of Global Minimum Requirements
Lendlease Global Minimum Requirements (GMRs)	The GMRs operate as our minimum Environment Health and Safety standards for how we operate anywhere in the world. All suppliers and their supply chains are required to observe these policies when working on our projects.
Employee Code of Conduct	The Code explains the standards the Company expects in the conduct of its operations and supports the Core Values, especially Integrity (which "is not negotiable").
Conduct Breach Reporting Policy	Enables employees (their families), contractors, suppliers and agents to speak up and report illegal or improper conduct occurring in the Lendlease Group business, including behaviour that does not accord with our Core Values, Employee Code of Conduct or Supplier Code of Conduct.
Diversity and Inclusion Policy	Sets out Lendlease’s commitment to workplace diversity and inclusion and conveys goals, measures and management approach.
Anti-Bribery Anti-Corruption Policy	All Lendlease Group directors, employees and third parties are to observe the UK Bribery Act 2010 wherever they operate, and for third parties, including suppliers, to have undergone compliance processes for screening plus due diligence checks.

Remediation

We recognise there is not a ‘one size fits all’ approach to providing a remedy, and that a legitimate remediation response is tailored to the particular facts of a situation. Each of the Key Contractors has non-retaliatory grievance mechanisms and remediation in place, and seek information from their own suppliers and subcontractors on their implementation approach and level of process embedment.

Exemplar Melton will investigate any report of potential occurrences of modern slavery taking place in its operations or supply chain, and will take all appropriate steps to rectify any confirmed incidents. Exemplar Melton will work collaboratively with our Key Contractors to achieve this goal.



5. Assessing Effectiveness of Actions Taken for Mitigating Modern Slavery Risks

On an annual basis, Exemplar Melton will review the effectiveness of the actions taken to address Modern Slavery risk in Exemplar Melton's operations and supply chain through reviewing the Modern Slavery Questionnaires completed by the Key Subcontractors together with a review of the Key Subcontractors Modern Slavery Statements, and updates to the Exemplar Melton Modern Slavery Risk Management Plan.

The review is performed by Exemplar Melton's legal and commercial team to identify and assess any new risks that may have emerged in Exemplar Melton's operations and supply chain. During the annual review, if there are identified exceptions, these findings are presented to the Exemplar Melton Board for response, monitoring and corrective action.

Exemplar Melton understands that reviewing and assessing the efficacy of the actions and processes put in place to combat modern slavery risks is a critical step in achieving our goal of eliminating modern slavery in our operations and supply chain. While we continue to develop processes to understand the risks of modern slavery, we are only just beginning to develop a potential framework for assessing the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains. We will consider the implementation of a statistical assessment of the Key Subcontractor Questionnaires in order to assess meaningful improvement in relation to de-risking our supply chains from a modern slavery perspective.

6. Consultation And Engagement Undertaking on Managing Modern Slavery Risks

The following governance process has been implemented by Exemplar Melton to provide the Exemplar Melton Board oversight of Exemplar Melton's actions to manage its modern slavery risk:

- Established a working group consisting of Exemplar Melton's CEO and commercial director to effectively manage modern slavery risk, discharge the obligations imposed on Exemplar Melton set out in this Statement and otherwise ensure compliance with the Modern Slavery Act; and
- On an annual basis and if there are exceptions to report, the working group will provide the Exemplar Melton Board with its findings in relation to assessment of potential risks and mitigating actions.
- In addition, Exemplar Melton will undertake supply chain engagement via the Modern Slavery Questionnaire, meeting with its Key Contractors to discuss modern slavery risk and making the Victorian government's Supplier Code of Conduct available to all of its contractors to assist them in identifying high-risk suppliers.
- Exemplar Melton requires all of its Key Contractors to read and aspire to comply with the Victorian government's Code of Conduct, as well as requesting its Key Subcontractors to annually confirm in writing that they have read and understood the Exemplar Melton Supplier Code of Conduct.
- During the reporting period, no reports were logged regarding modern slavery or labour rights concerns through Ethics Point, nor through other channels as far as we are aware.

7. Consultation and Additional Information

Exemplar Melton is committed to continuous improvement in the assessment of and response to modern slavery risks, allowing Exemplar Melton to better assess and address: the supply chain risks already identified; potential partnering opportunities with industry groups; and the incorporation of modern slavery clauses in new contracts with relevant stakeholders to facilitate Exemplar Melton's compliance with Modern Slavery obligations and goals.

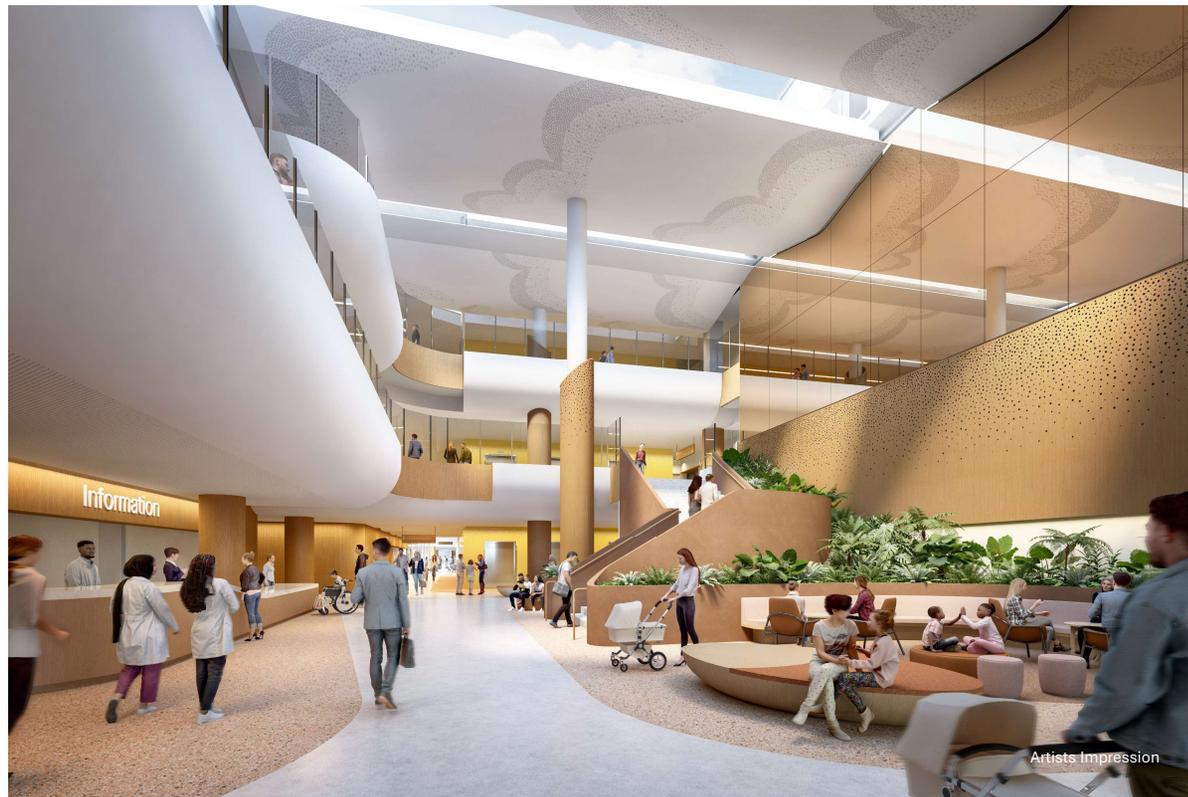
7.1 Looking Back

The Project reached contractual close during the reporting period, resulting in the commencement of the design process which will be the primary Project activity during the early stages. The latter part of the reporting period saw the commencement of site establishment works, with a permanent on site work-force now in place.

While a review of Key Subcontractor Modern Slavery Statements was a useful exercise in assessing Modern Slavery risks, the preparation of the Modern Slavery questionnaire is an important step in continuing to refine Exemplar Melton's understanding of its operations and supply chain.

7.2 Looking Ahead

Exemplar Melton will be working closely with the Key Subcontractors during the next reporting period as the Project moves into more intensive construction activities, which will result in a significantly larger workforce and an increased risk of labour issues including potential modern slavery risks. Exemplar Melton will also look to refine its assessment tools to establish a metric by which the efficacy of modern slavery risk mitigation actions can be assessed.



This Statement is made pursuant to section 13 of the Modern Slavery Act 2018 (Cth) and constitutes the Modern Slavery Statement for Exemplar Melton.

The Statement has been prepared by the Exemplar Melton CEO and was approved by the Exemplar Melton Board on 8 December 2025.

Signed:

A handwritten signature in black ink, appearing to be 'S. Neaves', written over a horizontal line.

Director name: Sarah Neaves
Chair of Exemplar Health (Melton) Pty Limited

Date: 09/12/2025