



ESTABLISHED 1963

**TOGA Group**  
**Modern Slavery Statement**  
**Financial Year 2024**



# TOGA

## MODERN SLAVERY STATEMENT 2024

### ABOUT THIS STATEMENT

This modern slavery statement (**statement**) is made by Toga Pty Ltd ACN 000 926 947 (**Toga Pty Ltd**), being the parent company of the TOGA group of companies (**TOGA**) pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**) for the financial year of 1 July 2023 to 30 June 2024 (**reporting period**). Toga Pty Ltd is a reporting entity pursuant to section 5 of the Act.

The purpose of this statement is to outline TOGA's approach to minimising the risk of modern slavery in our business operations and supply chains. The statement sets out the actions taken by TOGA during the reporting period to reduce the risk of modern slavery practices in our business operations and supply chains as well as how TOGA intends to continually improve its processes.

At TOGA, we are committed to ensuring that modern slavery has no place within our operations or supply chains. We recognise the importance of addressing this global issue and take our responsibility seriously in combating modern slavery in all its forms. This statement outlines our approach to preventing and mitigating the risk of modern slavery, as well as our ongoing efforts to promote transparency and accountability. We strive to operate in an industry that is free from exploitation, where all individuals are treated with dignity and respect. TOGA is committed to reducing the risks of modern slavery in our business operations and supply chains and to responding to incidents where they might occur.





TOGA comprises a range of entities which contributed to its annual consolidated revenue as at 30 June 2024. The key entities comprising TOGA include:

- Toga Pty Ltd ACN 000 926 947– Toga Group Finance entity (62 employees)
- Toga Cranes Pty Ltd ACN 655 082 189 (3 employees)
- Toga Project Services Pty Ltd ACN 000 965 515 – Provision of construction development and project management services (49 employees)
- Toga Constructions NSW Pty Ltd ACN 143 154 045 – NSW Construction entity (57 employees)
- Robert Edwards Real Estate Pty Ltd ACN 000 605 818 – operating entity for Toga Sales & Leasing (6 employees)

TOGA has an investment in TFE Hotels, a joint venture with Singapore's Far East Orchard Limited, which is an international hotel group, headquartered in Australia, with operations in Australia, New Zealand and Europe (Germany, Denmark, Austria, Switzerland and Hungary). TFE Hotels has its own Modern Slavery Statement.

## OUR SUPPLY CHAINS

TOGA's business involves the following primary supply chains:

1. Consultants including architects, structural, services, façade, environmental and geotechnical involved in the design process.
2. Contractors and subcontractors including structural, plumbing, electrical, mechanical, waterproofing, early works, and demolition trades.
3. Suppliers of goods, services, and materials for all stages of the construction as well as asset management.
4. Suppliers and manufacturers of FF&E.
5. Sales agents for residential apartments as well as conjunction agents, marketing, and PR firms.
6. Ownership and management of commercial and retail premises and hotels, including facilities management, security, and property managers.
7. Information technology infrastructure and services.
8. Professional services including legal, tax, accounting, audit and insurance.
9. Outsourced offshore services such as accounts payable, treasury and IT support services.

## WHAT ARE THE RISKS

TOGA's developments are located in Australia where there is a strong legal framework, minimum wage laws, regulations governing workplaces and a robust labour market.

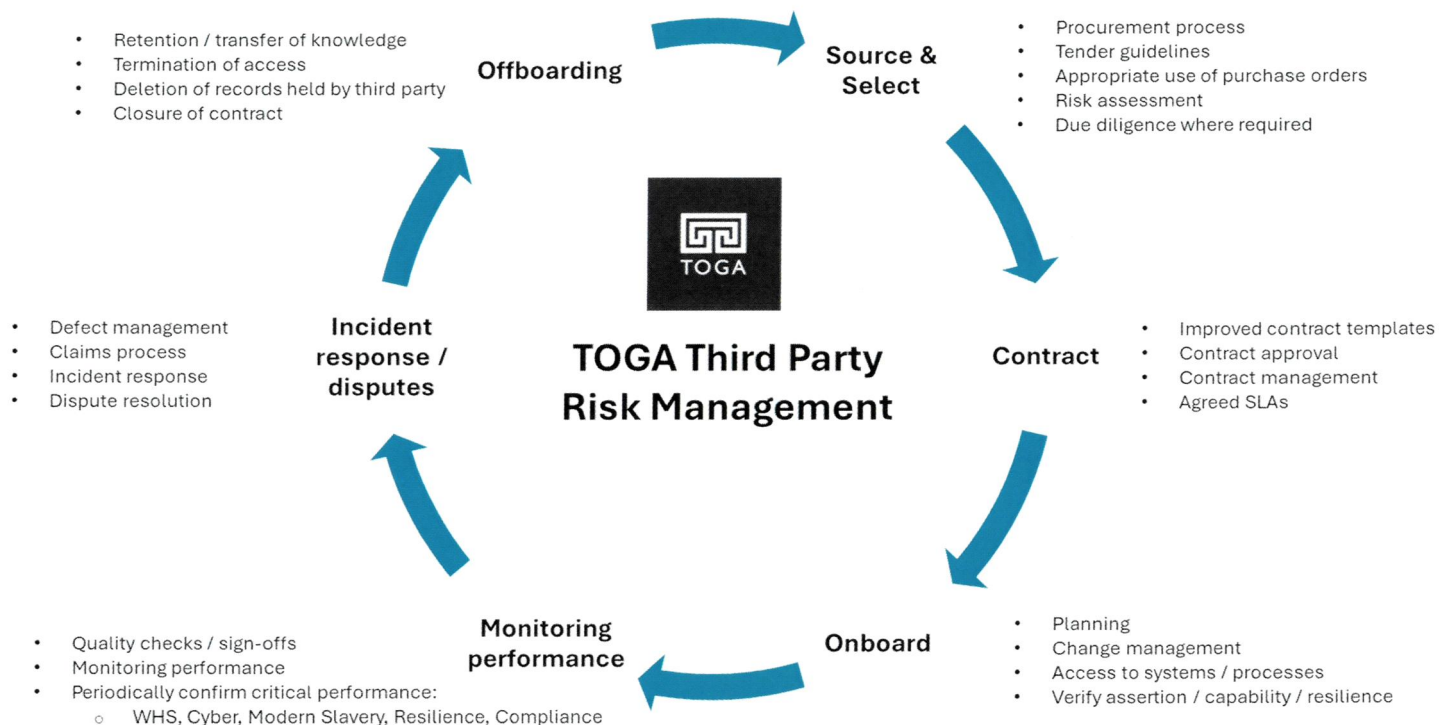
While the risk of modern slavery may be less extreme in Australia compared to other countries, TOGA recognises that the risk of modern slavery and exploitation does exist within Australia and that ongoing efforts are required to effectively identify, prevent and address modern slavery in all its forms.

Notwithstanding the above, the property development and construction industry has certain components which are assessed to have a higher risk of modern slavery practices including where our operations may be connected to activities of suppliers of goods and labour with whom we have a business relationship.



## ACTIONS TAKEN

TOGA has always been guided by the simple principle of “doing the right thing”. We have established strong policies and processes over the more than 60 years we have been operating. 2024 has marked another milestone as we continue to improve our risk management capability. As part of the journey, we’re consolidating the way we engage with our partners under a refreshed third-party risk management framework. The following illustrates our target state position that we are working towards.



The following provides an overview of policies and processes we already have in place and are continuing to strengthen.

- 1. POLICIES** – policies are easily available to all staff on the Groups intranet and updated annually, including:
  - Code of Business Conduct and Ethics**
  - TOGA Modern Slavery Policy Statement** – High level policy statement outlining TOGA’s position on modern slavery.
  - TOGA Risk Management Policy** – Ensures we have structured approach to identifying and address risks across our operations.
  - Work, Health and Safety Policy** – Implements and maintains mandatory safe working conditions for all team members and contractors.





### 3. REPUTABLE SUPPLIERS

The development of long-standing relationships with reputable suppliers over the more than 60 years of trading has allowed TOGA to have a greater understanding of the culture and practices of our suppliers and more easily identify where the risk of modern slavery practices may exist. We engage a family of sub-contractors who are assessed before, during and after each project to ensure they provide high quality services, including well established safety, quality and labour practices. We aim to set realistic cost targets and delivery timeframes for all sub-contractors and suppliers in our supply chain.

Our subcontractor and supplier selection process remains the focus of complying with government mandated standards and WHSE requirements aligned to our social and environmental values.

Our outsourced offshore services are located in India which has a vulnerable population and is high risk for modern slavery practices. Accordingly, we have engaged a tier-one service provider under strict contractual obligations in relation to compliance with applicable laws and who has pro-actively issued a global modern slavery statement detailing the full extent of safeguards it has in place to prevent modern slavery in its supply chain and operations.

### 4. ONGOING ENGAGEMENT WITH SUPPLIERS

During the reporting period, TOGA business units continued to review their respective supply chains including considering the geography, industry and workforce and took opportunities to engage with suppliers. Examples of this include:

- Members of TOGA FF&E team continued to visit a number of our furniture, stone and branded accessory supplier facilities and warehouses overseas (including China) during the year.
- Our construction teams ensure all suppliers are assessed and provide attestations as to their modern slavery practices. Where uncertainty exists, our teams will undertake further due diligence which may include site visits to confirm representations made as part of the contracting process.
- Our finance team continues to engage with local representatives of our offshore service providers and periodically conduct site visits.

Visits to suppliers and service providers assists with mitigating modern slavery risks in the following ways:

- Providing firsthand visibility into the working conditions of employees and enabling a transparent assessment of workplace safety, sanitation and general labour conditions.
- Allowing direct access to employees to gauge their job satisfaction.
- Meaningful engagement with the supplier which invites the opportunity to discuss a shared commitment to ethical sourcing.
- An opportunity for general due diligence, audit and compliance checks.



No instances of modern slavery have been identified during the financial year ending 30 June 2024 in TOGA's operations and supply chain. We will continue to monitor and assess our actions to address modern slavery risks and take necessary action in response to risks that are identified.

## CONSULTATION PROCESS WITH SUBSIDIARIES IN PREPARING THIS STATEMENT

TOGA maintains one leadership team across each of its subsidiaries and there is therefore one management team responsible for coordinating TOGA's response to modern slavery risks in its operations and supply chains.

## OUR FUTURE PLANS

TOGA's efforts to date have been focused on our risk identification, governance and establishing our internal understanding of modern slavery risks relevant to our business operations.


We recognise that eliminating modern slavery practices in the property development and construction industry is an ongoing long-term goal that requires a commitment to continuous improvement and a focus on implementing well considered effective priorities and plans.

Our roadmap has identified the following priorities and initiatives for the financial year ended 30 June 2025 (FY25).

- **Risk governance** – our Risk & Compliance Committee has been expanded to ensure representation from all areas of our business. A key focus of the committee for FY25 is how we manage our third-party risk including the risk of modern slavery across our supply chain.
- **Risk management capability** – we're continuing to invest in our risk management capability to provide further support to our leaders in identifying risks including modern slavery risks and managing them proactively.
- **Third party risk management** – we're consolidating our third-party risk management activities to ensure we address all risks associated with the products and services provided by our business partners including risks of modern slavery.
- **Supply chain risk management** – we're analysing our supply chain to better understand the potential for modern slavery across our operations. We'll engage with those key suppliers in a more collaborative way to provide us greater comfort that appropriate practices are in place to minimise the risk of modern slavery.

## APPROVAL

This Modern Slavery Statement was approved by the Board of Toga Pty Ltd on 20 December 2024 for lodgment on the Register.



Allan Vidor AM  
Managing Director, TOGA  
20 December 2024