

CHARTER HALL GROUP

Modern Slavery Statement FY22



Acknowledgement of Country

Charter Hall is proud to work with our customers and communities to invest in, develop and manage properties on land across Australia. We pay our respects to the Traditional Owners, their Elders past, present and emerging and recognise their continuing culture and contribution to this Country.



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About this Statement

Welcome

This is our third Modern Slavery Statement (Statement).

It outlines the approach we have taken to understand, identify, manage and mitigate the risks of modern slavery in our operations and supply chain for the financial year ended 30 June 2022 (FY22).

This Statement has been prepared and issued by Charter Hall Limited (ABN 57 113 531 150) and Charter Hall Funds Management Limited (ABN 31 082 991 786 AFSL 262861) (CHFML) as Responsible Entity of the Charter Hall Property Trust (together, we refer to these entities as the Charter Hall Group for the purposes of reporting under the Commonwealth *Modern Slavery Act 2018* (the Act)).

'Charter Hall', 'CHC', 'our', 'Group' and 'we' in this Statement refer to Charter Hall Group and its reporting entities.

Consultation with Charter Hall reporting entities

Our consultative approach to managing modern slavery is consistent with previous years. Each of our reporting entities has its own governance structure (including its own Board) that determines decision-making for assets within its portfolio. The reporting entities are further supported by Group and sector sustainability and community teams who provide regular updates and reports to each Board.

Each reporting entity has delegated day-to-day operational management to our Group. This management is undertaken in accordance with our policies and Codes of Conduct.

All our responsible entities, or trustees (where applicable), have endorsed the following CHC codes and policies:

- the [Sustainability Policy](#) and the [Sustainability Strategy](#), reflecting our commitment to responsible and sustainable business practices
- the [Human Rights Policy](#), that outlines our commitment to human rights in our operations and supply chains
- the [Supplier Code of Conduct](#), which promotes ethical, environmental and social standards throughout our supply chain, including our relationships with contractors, subcontractors, consultants and suppliers

The [Supplier Code of Conduct](#) and the [Sustainability Policy](#) were updated in FY22 and endorsed by each of our reporting entities.

This Statement covers the following reporting entities:

Listed entities

- Charter Hall Holdings Pty Ltd (CHH) – Charter Hall Funds Management Limited (CHFML) as Responsible Entity for Charter Hall Property Trust (CHPT)
- Charter Hall Social Infrastructure Limited (CHSIL) as Responsible Entity for Charter Hall Social Infrastructure REIT (CQE)
- Charter Hall Retail Management Limited (CHRML) as Responsible Entity for Charter Hall Retail REIT (CQR)
- Charter Hall WALE Limited (CHWALE) as Responsible Entity for Charter Hall Long WALE REIT (CLW)

Unlisted entities

Direct Funds

- Charter Hall Direct Property Management Limited (CHDPML) as Responsible Entity for Charter Hall Direct Office Fund (DOF)
- Charter Hall Direct Property Management Limited (CHDPML) as Responsible Entity for Charter Hall Direct PFA Fund (PFA)
- Charter Hall Direct Property Management Limited as the Responsible Entity for Charter Hall Direct Industrial Fund No. 4 (DIF4)

Wholesale Property Funds

- Charter Hall Investment Management Limited (CHIML) as Responsible Entity for Charter Hall Prime Industrial Fund (CPIF) and Charter Hall Prime Office Fund (CPOF)
- Charter Hall Wholesale Management Limited (CHWML) as Trustee for Charter Hall Office Trust (CHOT)



ABOUT THIS STATEMENT

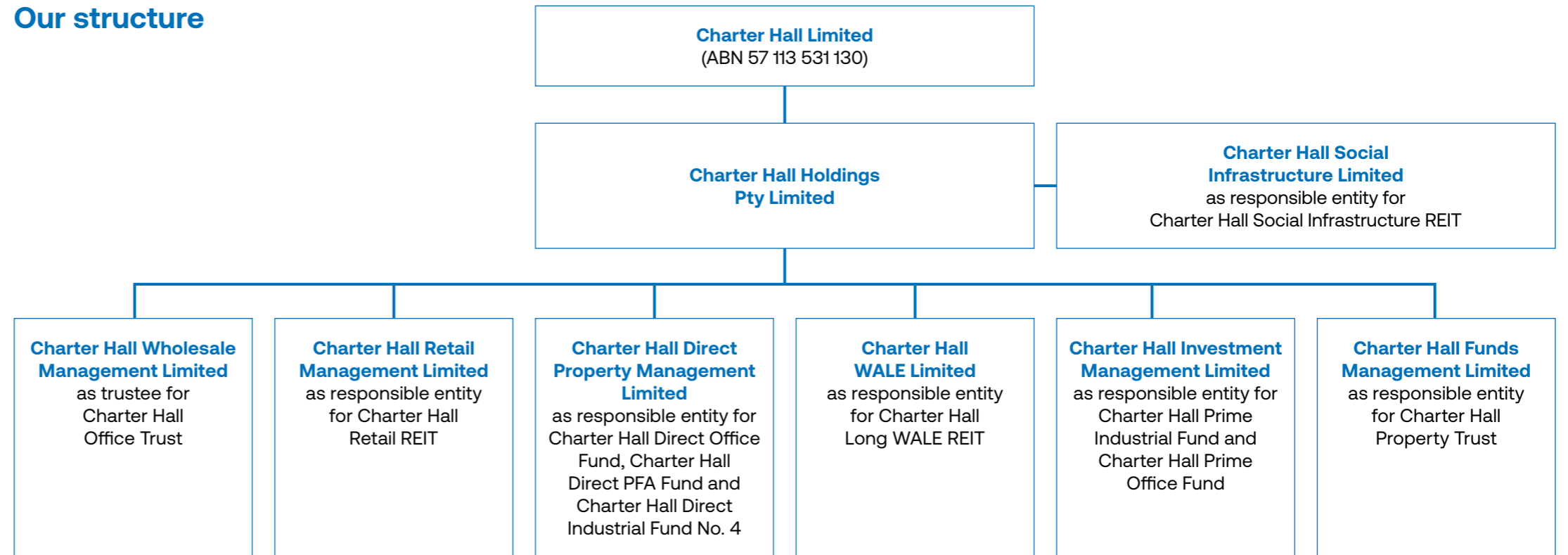
Our approach

Consistent with the previous reporting period, we engaged with our reporting entities on modern slavery through Board briefing papers. This Statement was designed in consultation with Charter Hall Group’s controlled entities and reporting entities through circulating the draft statement for comment from the Boards and meetings with the appropriate executive teams to discuss feedback.

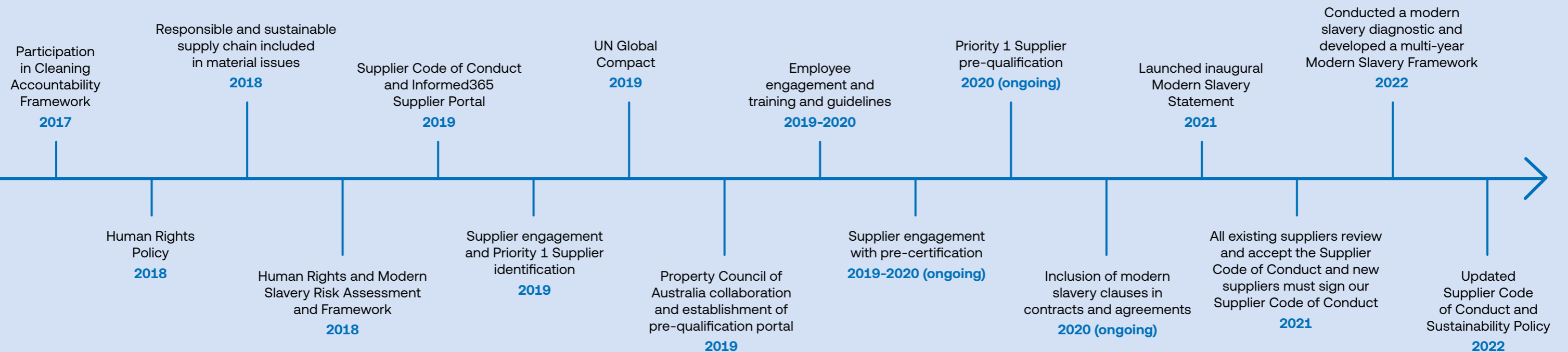
Our Modern Slavery and Human Rights Working Group (with representatives from key functions and sectors) reviewed the Statement and met to specifically provide feedback on it. In addition, a sub-Working Group (made up of a representative from the Group and from each sector) provided initial input regarding the achievements, progress and challenges for this year’s Statement.



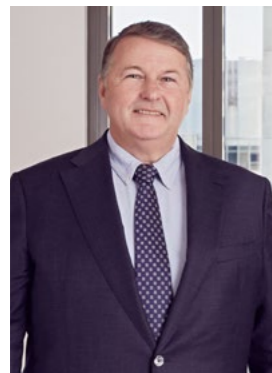
Our structure



Our human rights and modern slavery milestones



Managing Director & Group CEO message



Partnership and mutual success underpin our commitments to drive value and bring aspirations to life. We prioritise the social and economic well-being

of people and communities through our values and through our business strategy and relationships.

The social and economic upheavals of the pandemic and geopolitical landscape have exacerbated poverty and modern slavery around the world. A recent report by the Australian philanthropic foundation, Walk Free, found that today around 50 million people are working in situations of modern slavery.

That's something none of us can walk away from. As a leading property investment and funds management company, we are committed to leveraging our market position and influence to address modern slavery. We continue to collaborate with and support our customers and our employees to recognise modern slavery risks and we are educating and monitoring our extended supply chain to set expectations that their work practices are ethical and responsible.

Our supply chain partners are central to our business, but certain services such as cleaning and security are known to carry a heightened risk of modern slavery. We rely on these services for the safe and efficient operation of our assets, but we also apply effective management practices to prevent worker exploitation. This year, we paid particular attention to cleaning and security services and we continued to monitor all our partners to ensure they are complying with our Supplier Code of Conduct.

We enhanced our partnership with global property facilities management firm CBRE, who procure and manage property maintenance services for most of our Office and Industrial & Logistics sectors. Specifically, we established and implemented systems that assess and manage modern slavery risks for our Tier two suppliers.

We conducted an independent assessment of our existing human rights approach across Office, Industrial & Logistics, Retail and Social Infrastructure, which found that we had laid solid foundations to identify and manage our modern slavery risk. We used this assessment to develop a multi-year Modern Slavery Framework to guide our approach going forward.

We continued to collaborate with our industry to amplify our modern slavery progress. Our ongoing involvement with the Property Council of Australia's Modern Slavery Working Group provided a unique opportunity to work together to address modern slavery.

We managed our operations in line with the UN Principles for Responsible Investment, UN Guiding Principles on Business and Human Rights (UNGPs), international legislation and the Australian *Modern Slavery Act 2018* (Cth). Charter Hall became a signatory to the United Nations Global Compact (UNGC) in 2019 and we continued to align our strategy, culture, policies and day-to-day operations with UNGC principles on human rights, labour, environment and anti-corruption.

Everyone deserves to be treated equally and with dignity and freedom from slavery is a fundamental human right. Although, modern slavery is a long-term and complex challenge for our sector, we are committed to improving resilience in the wider community and to how we assess and address modern slavery risks in our operations and across our value chain.

This Statement was approved by the Charter Hall Group Board on 6 December 2022.

David Harrison
Managing Director & Group CEO

Key achievements this year

1

Third-party assessment

We engaged a third-party consultant to conduct a modern slavery diagnostic and assess the maturity of our existing human rights approach. The goal was to identify strengths and gaps in our current systems and processes and determine current state maturity. The assessment found we have solid foundations in place to identify and manage modern slavery risk within our value chain.

Please see [page 16](#) for more information.

2

Modern Slavery Framework

We worked with a third-party consultant to develop a Modern Slavery Framework to guide our modern slavery approach over the next three years. This Framework includes a series of recommendations focused on helping us uplift our approach to the next level of maturity.

Please see [page 16](#) for more information.

3

Procurement Working Group

We established a Procurement Working Group to oversee the supplier onboarding process, rationalise the vendor database, coordinate common cross-sector procurement initiatives and improve controls over vendor selection. This enables a more consistent approach to identifying and addressing modern slavery risks in our supply chain.

Please see [page 17](#) for more information.

4

Collaboration

Through our partnership with CBRE, we implemented their Risk Ecosystem and enhanced due-diligence framework that is designed to identify potential risks and support escalation procedures (where CBRE is our Facilities Manager).

We continued to drive industry collaboration and direction on modern slavery, with one of our employees acting as Chair of the Property Council of Australia's Modern Slavery Working Group.

Please see [page 15](#) for more information.

5

Supplier spend analysis

We analysed our overall annual supplier spend in the high-risk categories of cleaning and security and found that 15 suppliers represent more than 90% of our spend in cleaning and security, helping to guide our modern slavery focus going forward.

Please see [page 14](#) for more information.

6

Operational management systems

We updated our standard terms and conditions to include modern slavery clauses across all purchase agreements. These updates addressed compliance with legislation, policy development and our reporting of incidents. We also updated our [Supplier Code of Conduct](#) and [Sustainability Policy](#) to outline the requirements of all suppliers with respect to modern slavery.

Please see [page 19](#) for more information.

Our business operations and supply chain

Securing better futures for all

Charter Hall Group is one of Australia's leading integrated property groups. Our diversified investment and funds management platform extends across the Office, Industrial & Logistics, Long WALE Retail, Shopping Centre Retail and Social Infrastructure sectors.

Environmental, social and governance (ESG) considerations create long-term value for our business and customers.

Sustainability is a cornerstone in our delivery of economic, environmental and social value to our direct stakeholders and the broader community. It is integrated into how we think and work. It's the forward-focused lens we use to assess, manage and achieve our goals.

It's also part of how we work in partnership with our customers, to create long-term risk adjusted returns for investors and healthier places. Underpinning this is a continued commitment to operating in line with the highest ethical standards and being a responsible business.

We are committed to preventing and addressing modern slavery, and this commitment forms part of our organisation's wider ESG commitments.



Our scale

We focus on quality investment in core sectors, creating an Australian funds management business of scale by global standards.

 **1,548**
properties

 **\$2.8bn**
net rental income

 **10.1m sqm**
of lettable area across the Group

Our funds under management (FUM)

The diversity of our property portfolio and business model means we offer a wide range of investment options. Our approach to investment uses partnership and financial discipline to deliver stability and long-term growth.

\$41.6bn
Wholesale pooled and partnerships FUM

\$13.5bn
Listed FUM

\$10.5bn
Direct (unlisted) FUM

Our purpose

Everything we do has a single-minded purpose: to create better futures by driving value and mutual success.

With partnership at the heart of our approach, we invest in people and places that help our customers and communities thrive. As a property investment and funds management company, we work closely with our tenant customers, investors, people and communities to unlock hidden value, provide superior returns and help businesses and individuals succeed.

Our values



Active partnership
We believe that if everyone benefits, we benefit.



Inventive spirit
We create with purpose and discipline.



Genuine insight
We use expertise to unlock resilient growth.



Powered by drive
We put our passion into action.



Our strategy

Our strategy remains focused on using our expertise to access, deploy, manage and invest equity to create value and generate superior returns for our investor customers.



Access

Accessing equity from listed, wholesale and retail investors



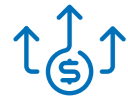
Deploy

Creating value through attractive investment opportunities



Manage

Managing our funds, assets and leasing and development services



Invest

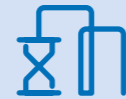
Investing alongside our capital partners

Our core areas of business



Investment management

We access capital from wholesale, listed and unlisted equity sources to secure properties with potential to generate consistent, long-term returns.



Property leasing

Working with our customers, we deliver property solutions designed around their long-term leasing needs.



Property development

We design and deliver Australian developments with a focus on sustainability, innovation and adding value.



Asset management

We aim to improve our properties, drive performance, build value and deliver better environments for our customers.



Property management

We provide day-to-day management of our properties including placemaking to enhance the customer experience.



Portfolio integration

We provide integrated property portfolio solutions for customers, enabling them to grow with us.



OUR BUSINESS OPERATIONS AND SUPPLY CHAIN

Our property portfolio

The Group oversee a portfolio of 1,548 properties that is more than 10.1 million squares metres in size.

Our Australian portfolio is geographically diverse with assets in all States and Territories.

Office

\$26.0bn 80 properties

We largely retain operational control, except for a small number of single tenanted assets. We partner with property facilities management firms such as CBRE, Knight Frank, Honeywell and Colliers who manage these assets (including procuring and managing property maintenance services) on our behalf.

Shopping Centre Retail

\$4.4bn 53 properties

We manage our assets and retain operational control. We have established procurement policies and procedures that incorporate modern slavery requirements.

Long WALE Retail

\$9.9bn 733 properties

Our tenants retain operational control of these assets, including property maintenance and related supply chain choices.

Industrial & Logistics

\$21.2bn 264 properties

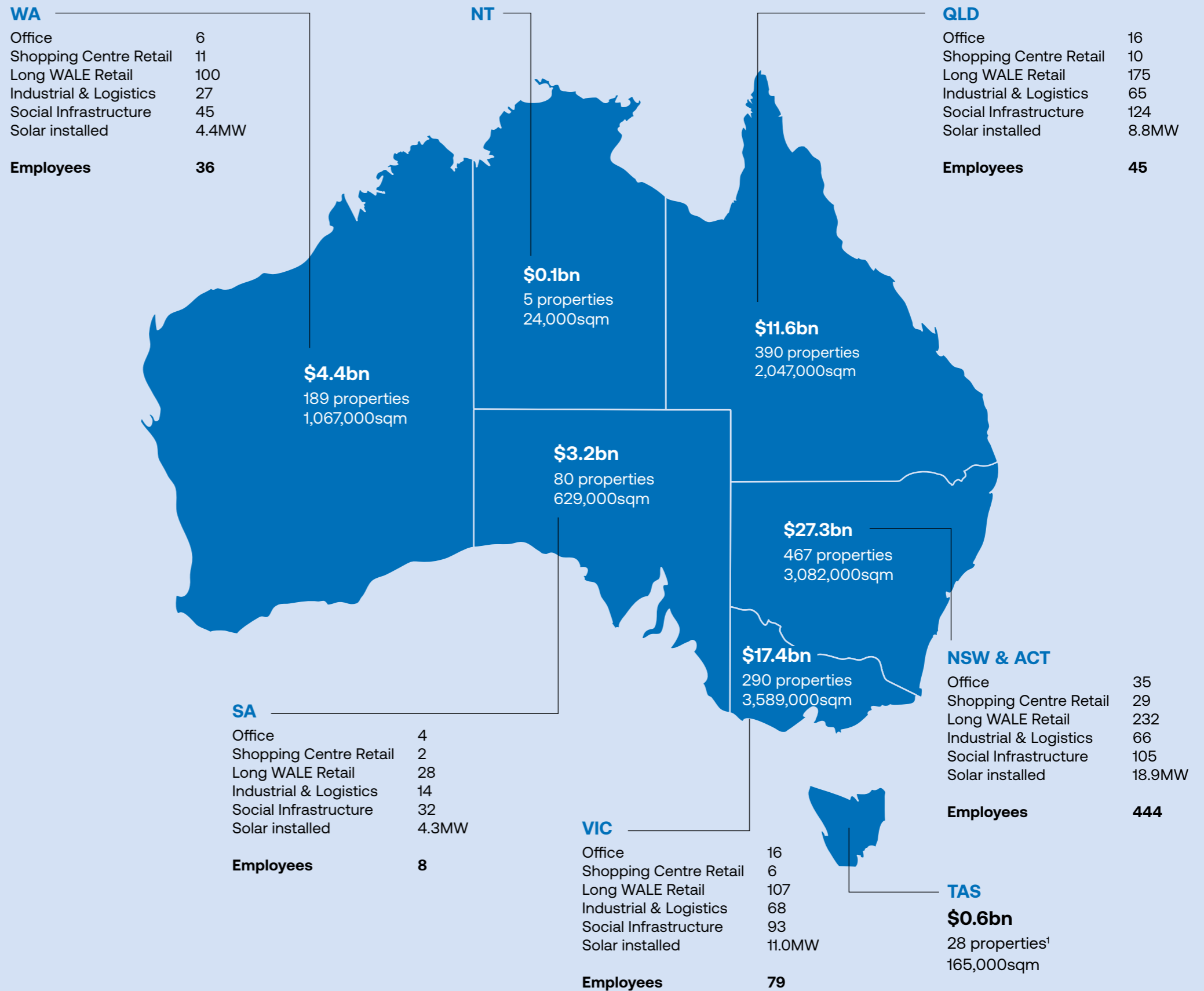
Our tenants largely retain operational control of these assets, including property maintenance and related supply chain choices.

We maintain operational control of common areas only.

Social Infrastructure

\$3.7bn 418 properties

Our tenants largely retain operational control of these assets, including property maintenance and related supply chain choices.



1. Stable assets.

OUR BUSINESS OPERATIONS AND SUPPLY CHAIN

Our supply chain

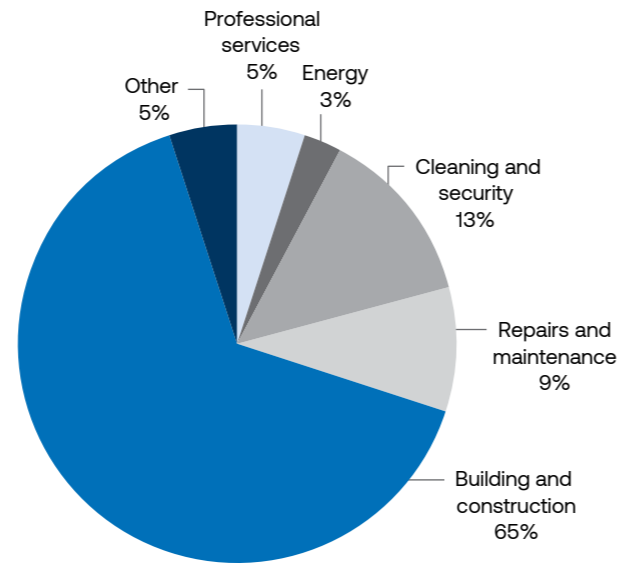
We use our property expertise to access, deploy, manage and invest equity in the Office, Industrial & Logistics, Retail and Social Infrastructure sectors. Our goal is to create value and generate superior returns for our customers to help them go further.

Our key products and services include property development, property management (including asset management and property leasing), investment management and portfolio integration (providing integrated property portfolios for customers).

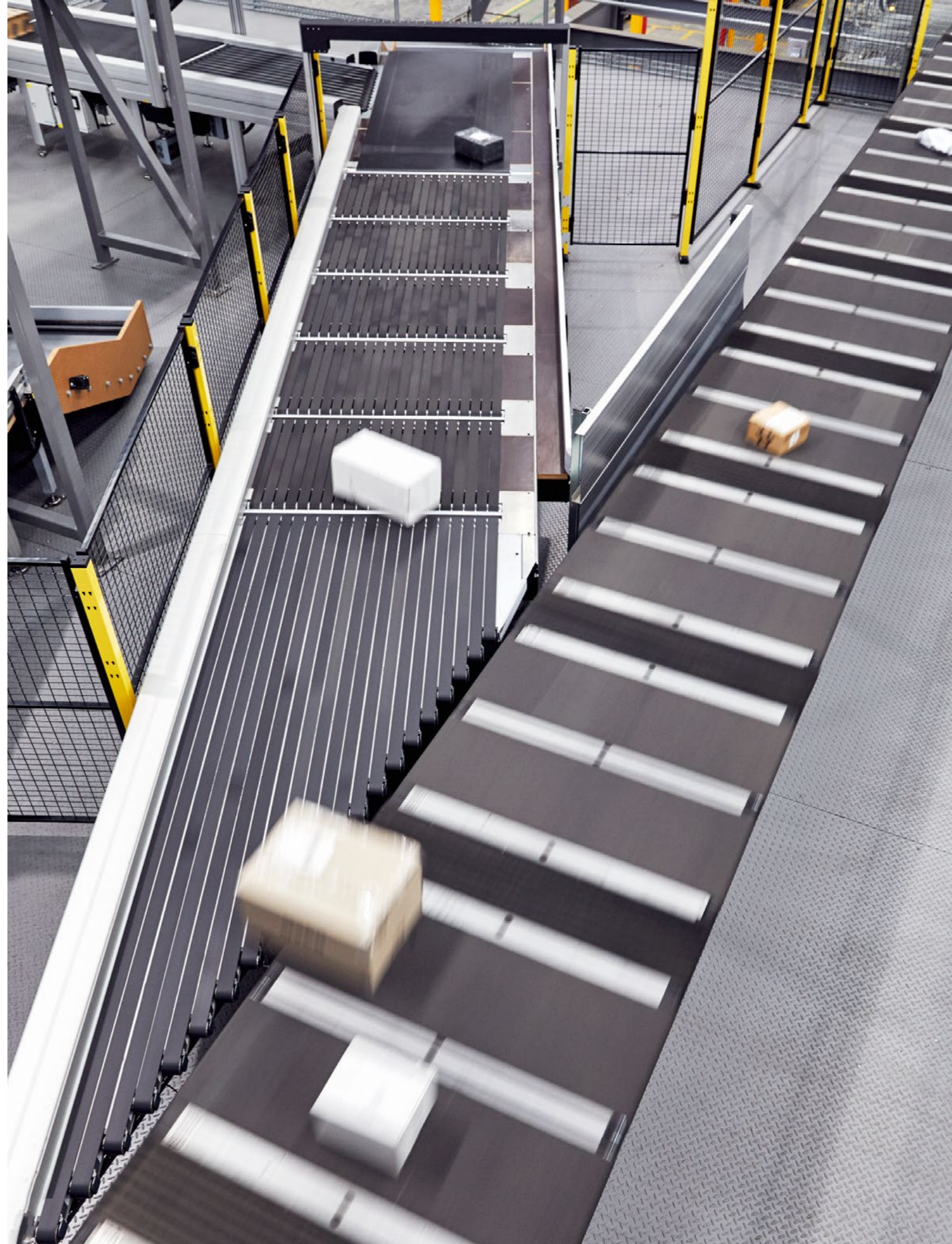
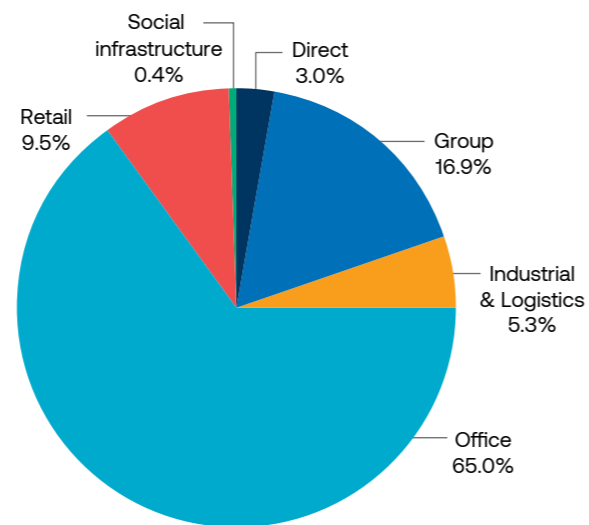
Our supply chain is made up of over 2,700 direct suppliers who support our operational management and development functions and services in over 950 communities throughout Australia.

Certain supplier categories represent the highest risk for potential occurrences of modern slavery in our supply chain. Our risk assessment identified these as property and facilities management, specifically cleaning and security. For further information, see our supply chain risk assessment on page 13.

Charter Hall engaged directly with over 2,700 suppliers in FY22. This includes the supply of cleaning and security services, energy, building and construction, repairs and maintenance services and professional services. Charter Hall's allocation of supplier spend is highlighted in the chart below.



The chart below outlines the share of our supply chain spend across each of our sectors and business. Our spend is most significant across our Office sector where we largely retain operational control of these assets.



OUR BUSINESS OPERATIONS AND SUPPLY CHAIN

Supply chains across key services

Property development

- Head contractor
- Engineering services
- Construction labour and services
- Construction materials and equipment

Property management, asset management and property leasing

- Facilities management
- Grounds and gardens maintenance
- Security
- Cleaning and hygiene
- Waste management
- Building maintenance
- Professional services supporting building management
- Airconditioning
- Fire services

Investment management and portfolio integration

- Professional and financial services
- Office supplies and furniture
- Information Communication Technology services and equipment
- Marketing merchandise
- Waste services
- Building services and equipment
- Airconditioning and fire services
- Courier services

Our supply chain and communities

45,000

investors and tenant customers

612

employees

5

workplaces nationally

>2,700

total suppliers engaged

61

high-risk suppliers

>950

communities nationally

Property facilities management

Across our Office and Industrial & Logistics sectors, we partner with property facilities management firms, such as Knight Frank, Honeywell, Colliers and CBRE, who procure and manage our property maintenance services. We are now in our fifth year of partnering with CBRE on modern slavery risks in our supply chain.

Sector	Assets managed by CBRE		Square metres managed by CBRE	
	Assets	% of portfolio	sqm	% of portfolio
Office	69	74%	1,490,574	78%
Industrial & Logistics	229	89%	5,353,364	89%

We manage our Retail assets and have established procurement policies and procedures that incorporate modern slavery requirements.

Across our Social Infrastructure portfolio, Long WALE Retail assets and Industrial & Logistics assets on triple net leases, our tenants largely retain operational control, including property maintenance and related supply chain choices.



Understanding our modern slavery risk

Responding effectively to our modern slavery risks involves understanding the nature of modern slavery as well as the factors that make it more likely to occur. This understanding allows us to act to address emerging high-risk situations to prevent incidents of modern slavery.

Our operational risk

We assess the risk of exploitative labour practices or modern slavery in our workforce as very low.

93% of our workforce is permanent, approximately 4% contractors, and the remaining 3% casuals and contingent workers¹ all based out of Australia.

We have over 600 employees based solely in Australia across New South Wales, Queensland, South Australia, Victoria and Western Australia. Each State has strong employment and work health and safety legislation that we are fully compliant with, as with relevant Commonwealth legislation.

Workforce breakdown by location



We're proud to have created an environment where people genuinely want to work. Key to our business strategy is creating a culture and working environment that enables our people to feel fulfilled in their roles. Our approach is underpinned by values-driven leadership, self-awareness, accountability, flexibility and choice.

Employee engagement

We use our Annual Employee Survey to measure our culture and engagement and to provide us with deeper insights into the structures, systems and capabilities that influence the way we work.

Key highlights this year include:

- We achieved above the global high-performing norm, with an engagement of 88% overall and a 96% participation rate
- 93% of our people say 'they would recommend Charter Hall as a good place to work'

In addition, we received the following recognition:

- We were awarded an Employer of Choice for Gender Equality by the Workplace Gender Equality Agency (WGEA)
- We ranked 8th in the inaugural Climate Leaders Asia-Pacific 2022 List of 200 companies for our integration of sustainability in our decision-making and strategy
- We were awarded 'Firm of the Year: Australia' by Private Equity Real Estate (PERE) 2021 Global Awards
- We were awarded Best Health and Wellbeing Program at the Australian Human Resources Awards 2021
- We were recognised as a Bronze Employer for LGBTQ+ inclusion in the Australian Workplace Equality Index (AWEI) Index 2022

Employee benefits

Our broad-ranging employee benefits reflect our commitment to mutual success and the value we place on our people, professionally and personally. Our employees can access a whole range of benefits to enable them to be their best at work and in their professional and personal life. These include:

- A flexible work environment enabled by mobile technology
- Variety of leave options
- WELL accredited workplaces, end of trip facilities and healthy catering options at work
- Access to well-being education events and challenges
- Access to Sonder, our 24/7 employee assistance program and well-being platform for confidential support on medical, physical and mental health for our employees and their families

Employee policies

We have comprehensive policies in place to contribute to a safe and fair working environment for our employees, including a Diversity & Inclusion Policy, Whistle-blower Policy, Employee Code of Conduct, Human Rights Policy, Domestic & Family Violence Policy and Work Health and Safety Policy.

1. As of 30 September 2022

UNDERSTANDING OUR MODERN SLAVERY RISK

Remuneration strategy

Our remuneration strategy is designed to attract and retain talented people by rewarding them for achieving performance outcomes that are aligned with our purpose, culture and values, business strategy, risk appetite and the long-term interests of our customers and investors. Remuneration is just one component of what we offer our employees. We also provide experience-based learning opportunities and flexible, inclusive workspaces and well-being initiatives that actively support productivity and performance.

We have four remuneration principles:

1

Deliver long-term results for investors

2

Attract, retain and motivate top talent

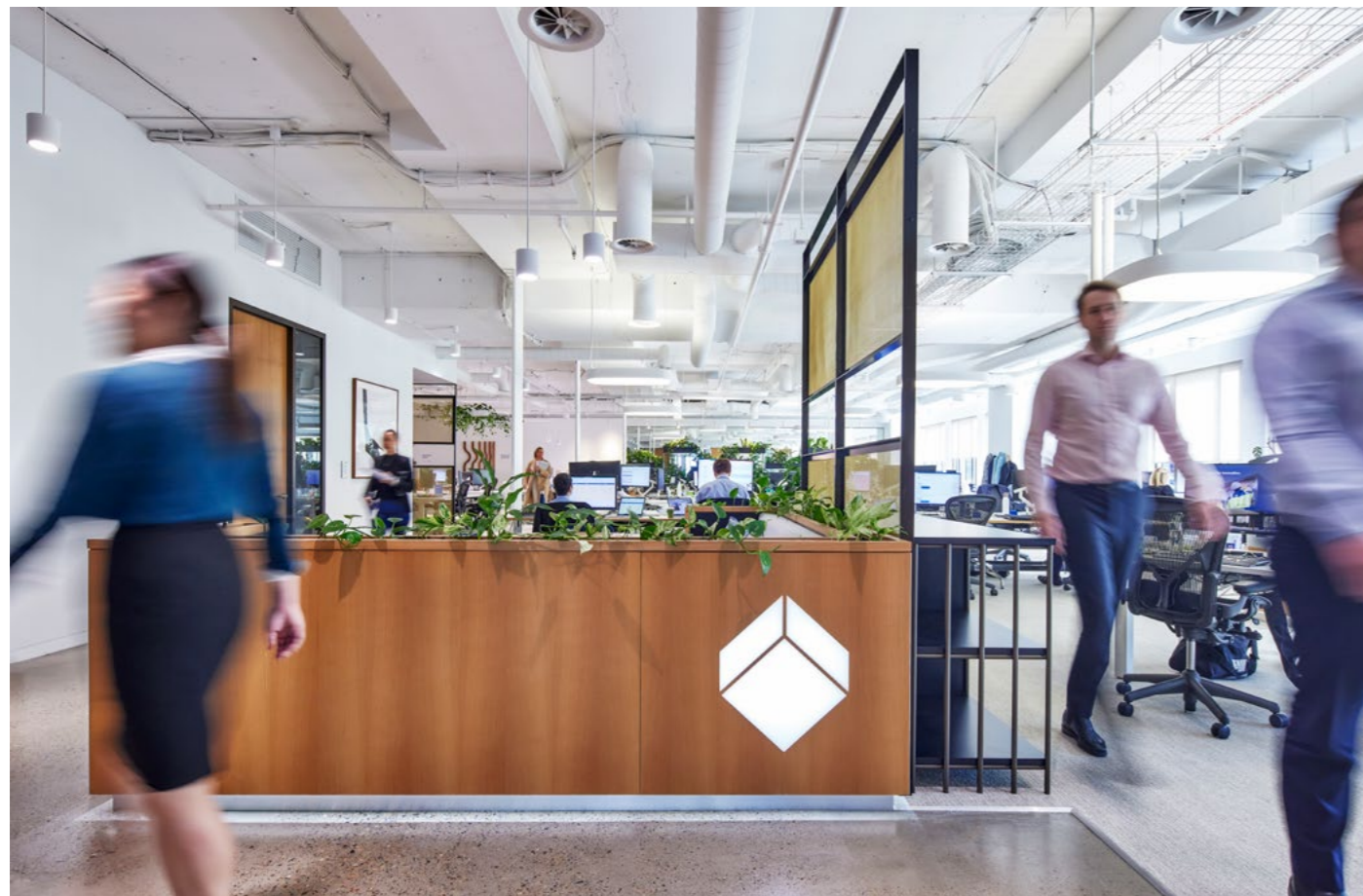
3

Be simple, transparent and consistent

4

Drive appropriate risk culture and employee conduct

Further details on our remuneration and governance framework is available in the Remuneration Report in the [FY22 Annual Report](#).



UNDERSTANDING OUR MODERN SLAVERY RISK

Our supply chain risk assessment

In 2018, we engaged a third-party expert to undertake a risk assessment of our operations and supply chains as part of a broader Human Rights and Modern Slavery Framework and Sustainable Procurement Road Map. This assessment remains relevant and we plan to conduct a further human rights issue identification process in FY23 to ensure our understanding of our most salient human rights and modern slavery risks is current and comprehensive. We plan to repeat this process every three years.

We prioritised our most material modern slavery risks by mapping our supply chain against the key risk factors of vulnerable workforce, business model and geographical location. This led us to define three areas of priority, based on inherent risk:

- Property and facilities management and operations, including cleaning and hygiene, building maintenance, grounds and gardens maintenance and security
- Construction materials and equipment
- Construction labour and services



Modern slavery risk factors

Priority supplier service category	Risk factors		
	Vulnerable workforce	Business model	Geographical location
Construction materials and equipment	<ul style="list-style-type: none"> - Low-skilled occupations 	<ul style="list-style-type: none"> - Extensive and complex supply chains - Subcontracting of manufacturing operations - Low profit margins 	<ul style="list-style-type: none"> - Possible jurisdictions with low human rights standards for extraction, processing and manufacturing
Construction labour and services	<ul style="list-style-type: none"> - Low-skilled occupations - Migrant workforce 	<ul style="list-style-type: none"> - Tight deadlines - Extensive use of subcontracting and casual labour - Low profit margins 	<ul style="list-style-type: none"> - Australia
Property and facilities management and operations	<ul style="list-style-type: none"> - Low-skilled occupations - Migrant workforce 	<ul style="list-style-type: none"> - Low profit margins - Casual labour - Subcontracting 	<ul style="list-style-type: none"> - Australia

The risks are present across all our sectors to varying degrees, with cleaning and security risks most salient across our Office and Shopping Centre Retail portfolios. Our tenants in Industrial & Logistics, Long WALE Retail assets and Social Infrastructure (such as early learning centres) retain operational control and largely directly engage their own cleaning and security employees. We work with tenant customers across these sectors to address modern slavery requirements through our supplier agreements, Code of Conduct and other engagement opportunities.

Emerging risks

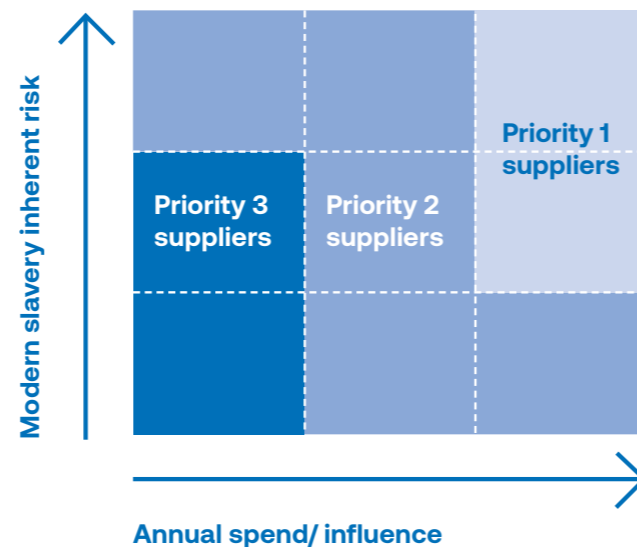
We acknowledge that human rights and modern slavery is a complex and constantly changing landscape. We are committed to regularly reviewing our modern slavery and human rights risks assessments every three years to ensure we are keeping abreast of emerging and changing human rights risks in our operations and supply chain.

The humanitarian crisis in Ukraine presented a range of issues with global supply chains and human rights challenges for impacted communities. While we don't have offices or suppliers in Ukraine, we do have employees with personal connections to the country and its people. With this in mind, we made \$5,000 available for employees with close family in Ukraine or bordering European countries who required resettlement. This one-off contribution supported travel, legal, translation and communications services. To support broader resettlement opportunities, Charter Hall also made a \$50,000 contribution to UNHCR, supporting the provision of much needed resources on the ground for Ukrainian people seeking refuge and resettlement.

Looking forward, we recognise that global inflationary pressure may exacerbate inequalities and human rights issues in impacted communities.

We also recognise that solar panels and materials used in the manufacturing process present significant modern slavery risks. We will assess our exposure in future risk assessments.

Human rights and modern slavery risk matrix



In FY22 we continued to apply our human rights and modern slavery risk matrix to over 2,700 of our suppliers. Specifically, we identified Priority 1 suppliers representing the high-risk industries of cleaning and security and invited them to participate in an online assessment through the Property Council questionnaire.

UNDERSTANDING OUR MODERN SLAVERY RISK

Supplier spend analysis

Certain supplier categories represent the highest risk for potential occurrences of modern slavery in our supply chain. Our risk assessment identified these as property and facilities management, specifically cleaning and security.

In FY22, we analysed our annual supplier spend in these high-risk categories. Our spend data shows that we engaged with 61 suppliers in the high-risk industries of cleaning and security. Fifteen of these suppliers accounted for over 90% of this spend.

These high-risk categories and suppliers will be a key focus for our modern slavery initiatives moving forward across all sectors such as supplier deep dive workshops and completion of the Property Council supplier questionnaire.

>90%

of spend in high-risk industries of cleaning and security is with 15 suppliers

Industry-led risk assessment and insights

Responsible and sustainable supply chain management includes working with other industry bodies and our suppliers to collaboratively assess modern slavery risk.

In FY22, we continued to collaborate with the Property Council, leading property organisations, Informed365 and industry experts to create a prequalification supplier platform. This platform asks suppliers about the actions they are taking to assess and address human rights issues and modern slavery risks across their operations and supply chains. The supplier prequalification portal also recognises that our suppliers in turn work with others in the property industry and enables them to complete a survey on their supply chains and practices, which can be shared with other property organisations.

In FY22, we focused the Property Council's supplier questionnaire on our high-risk suppliers in the categories of cleaning and security.

The Property Council questionnaire was sent to 33 of our cleaning and security suppliers, representing 99% of our total cleaning and security spend. This included both Tier 1 suppliers (engaged through our Retail portfolio) and Tier 2 suppliers, largely engaged through CBRE in our Office and Industrial & Logistics portfolio.

31 suppliers completed the survey by the end of June 2022 representing a 94% completion rate. Overall, responses were encouraging, revealing no red flags or significant areas of concern. All those who completed the Property Council questionnaire scored either a low or medium risk across the full range of criteria. Further analysis of the medium risk responses only highlighted the need for further training and maturing of the suppliers' business operations as next steps for improvement.

We gained the following insights:

77%

of suppliers provide new employees with information and training on human rights policies or expectations around modern slavery (with another 14% of our suppliers planning to do so in the next 12 months)

80%

provide employees with refresher training (with the remaining 20% planning to do so in the next 12 months)

68%

have undertaken some form of modern slavery risk assessment or plan to do so in the next 12 months¹

100%

of these organisations provide every worker at all sites and facilities with written and understandable information about their employment conditions.

We will continue to use the results of the Property Council questionnaire to inform further capacity-building activities with our suppliers.

¹ 48% of suppliers have completed a risk assessment with another 20% planning to do so in FY23.

UNDERSTANDING OUR MODERN SLAVERY RISK

Risk assessment of Tier 2 suppliers

Through our partnership with CBRE, we implement a series of modern slavery assessments and controls for our Tier 2 suppliers.

Case study: Power of partnership to combat modern slavery

74% of our Office buildings are managed through CBRE. This means that CBRE engages suppliers such as cleaning, security and electricians to manage these buildings on our behalf. It is imperative that we partner closely with them on our joint approach to managing modern slavery across such a significant footprint of our Office portfolio.

Like Charter Hall, CBRE has a zero-tolerance approach to modern slavery and is committed to consistently reviewing and strengthening its processes and systems to minimise the risk of human rights infringements anywhere across the shared supply chain. All suppliers must comply with CBRE's modern slavery assessments and controls.

We have worked with CBRE to implement their Risk Ecosystem via a three-tier approach to modern slavery.

1 Pre-qualification

CBRE's suppliers are categorised based on risk and spend, then complete an on-line questionnaire of 80-90 questions, providing base level data collection and compliance screening regarding modern slavery, work health and safety, environment, and sustainability. All suppliers are required to accept CBRE's Supplier Code of Conduct.

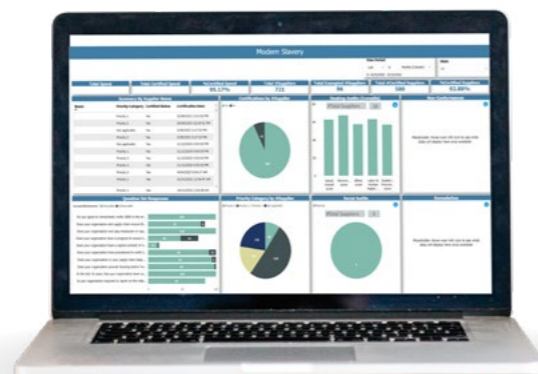
2 Desktop audits

CBRE conducts additional assessments for medium and high risk preferred suppliers¹ through a variety of third party platforms, including EcoVadis, which measures performance on key dimensions of ESG, CM3 / Avetta, which assesses supplier WHS risks, and World Check, which provides sanctions screening, including legal and adverse media screening.

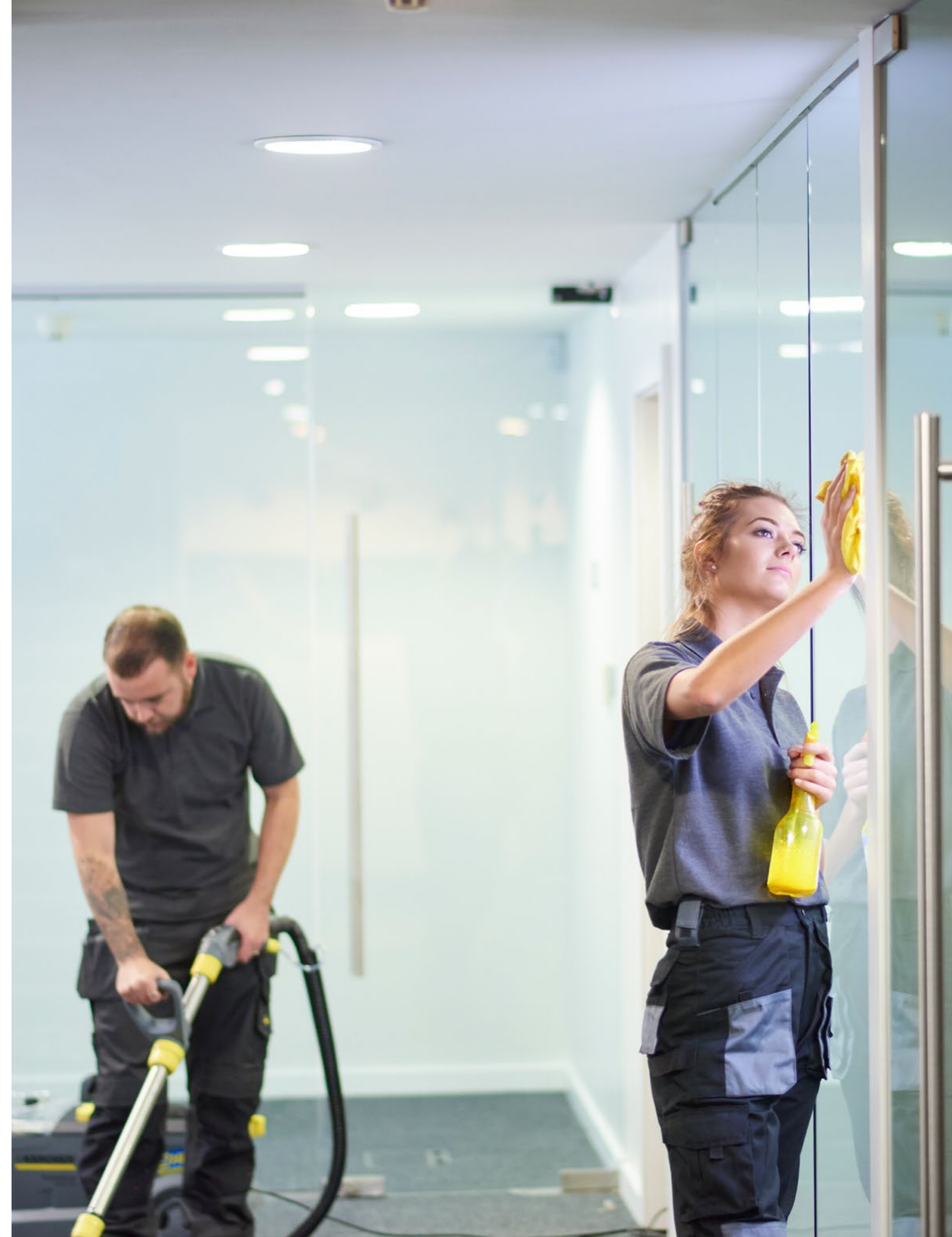
3 Third-party audits and governance

CBRE's preferred high-risk suppliers are required to participate in CBRE's ethical audit and supplier partner program which includes modern slavery. As part of the supplier partner program, supplier performance is monitored quarterly against Key Performance Indicators and via regular governance meetings. Preferred high-risk suppliers are required to undertake a third-party ethical audit for a higher level of assurance.

We are also working on the development of a live dashboard to report on the progress of modern slavery measures and to interrogate modern slavery and diverse procurement metrics for CBRE's suppliers engaged across our portfolio.



¹ Preferred suppliers meet CBRE's global minimum requirements in compliance, risk management and contracting and offer exceptional performance in meeting Charter Hall's emerging needs through strategic alignment, innovation, ESG and efficiencies.



How we manage modern slavery risk

Human rights and modern slavery diagnostic assessment

In FY22, we engaged a third-party to conduct a Human Rights and Modern Slavery Diagnostic Assessment of our current modern slavery response, aligned to best practice including the requirements of the UN Guiding Principles on Business and Human Rights. This assessment was used to diagnose the maturity of Charter Hall's current approach to identifying and managing human rights risk, with a particular focus on modern slavery.

The assessment identified strengths and gaps, enabling a deep understanding of the ways in which our current systems can be amended to enhance capability. It also informed the development of Charter Hall's Human Rights and Modern Slavery Framework and an action plan for improving our modern slavery risk management over the next three years.

A key finding was that we have already laid solid foundations to identify and manage modern slavery risk upstream within our value chain and via our strong participation in collaborative industry initiatives.

Further, it was found that our response is most mature in our Office and Retail sectors and the greatest opportunity for improvement is to harmonise our approach across the Group. The next level of maturity would see us formalise our existing process, leverage and extend the work we have already commenced and create consistent processes to identify and manage human rights and modern slavery risks.

The findings of this assessment formed the basis of Charter Hall's Modern Slavery and Human Rights Framework.

Charter Hall Modern Slavery and Human Rights Framework

The assessment informed a series of strategic recommendations focused on enabling us uplift our modern slavery response. These high level recommendations focused on:



Governance and human rights commitments



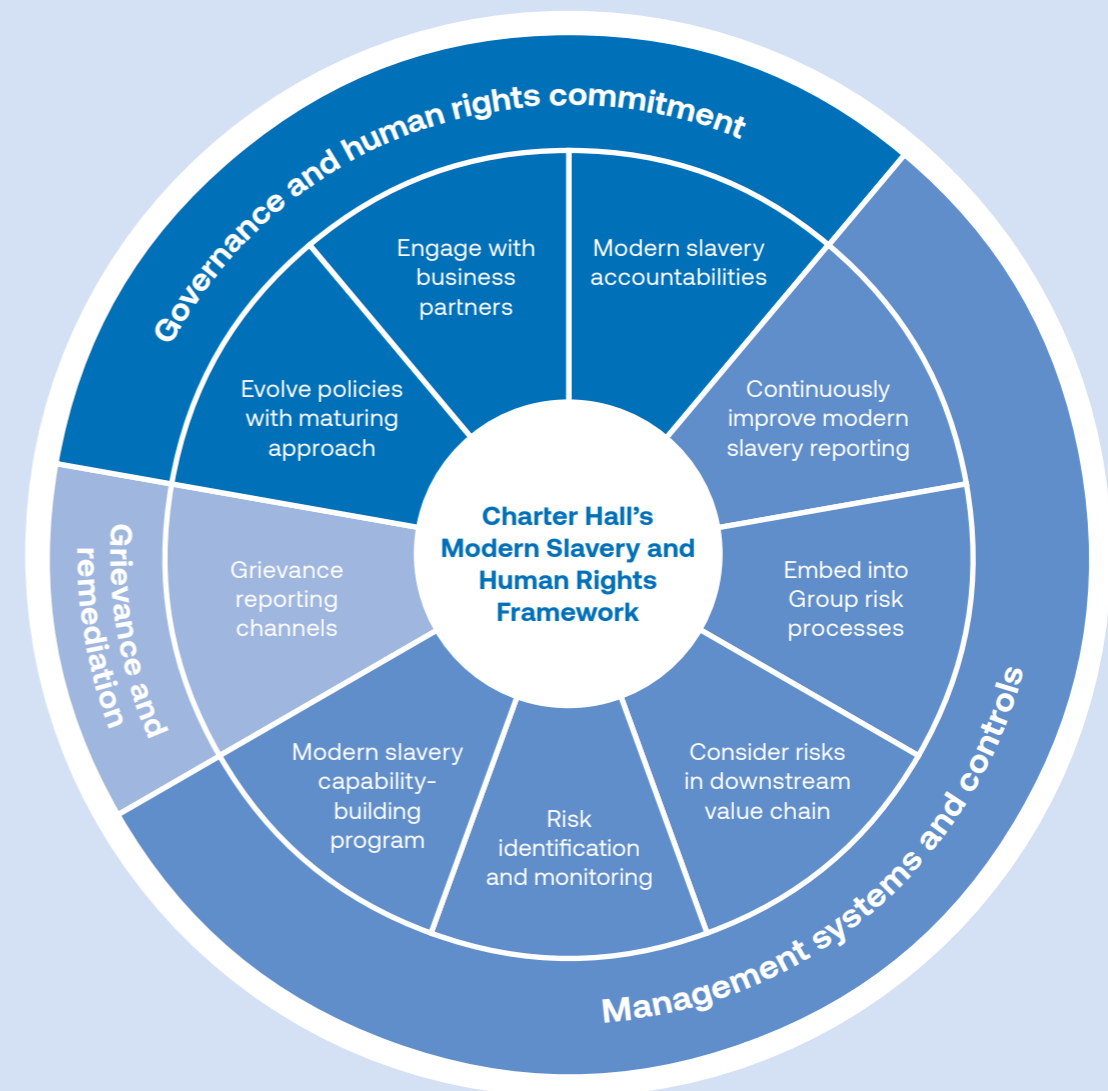
Management systems and controls



Grievance mechanisms and remediations

The diagram below summarises the nine key recommendations which form the basis of Charter Hall's multi-year Modern Slavery and Human Rights Framework. Each recommendation includes a detailed action plan with implementation steps to mature our modern slavery response and position us to address our key risks.

Our Modern Slavery and Human Rights Framework will guide our modern slavery focus over the next 2-3 years. Our progress to date against the three key elements of this Framework is outlined in the following pages.



HOW WE MANAGE MODERN SLAVERY RISK



Governance and human rights commitment

We remain committed to managing our operations in line with the UN Guiding Principles on Business and Human Rights (UNGPs), the UN Global Compact and Australian modern slavery legislation.

Our approach to assessing and managing modern slavery risks is consistent with the UNGPs, the current authoritative global standard on preventing and addressing business-related human rights issues. We focus on understanding our modern slavery risks through the perspective of the victims of modern slavery and embedding human rights due diligence into our business practices.

We align our sustainability goals, responses and targets to the UN Sustainable Development Goals (SDGs). The complete list of SDGs relevant to our business operations can be found [here](#). The SDGs most relevant to this Statement are:



We maintain ethical, environmental, and social standards and continuously improve our application of these throughout our operations, practices and supply chain. This commitment extends to our Directors, employees, contractors, subcontractors, consultants and suppliers whom we expect to conduct business in a safe, responsible and equitable manner and in compliance with all applicable laws, regulations and standards.

Delivery of our human rights and modern slavery framework is the responsibility of all employees in their day-to-day roles and is overseen by our Human Rights and Modern Slavery Working Group, which reports through to the Charter Hall Executive Committee, the Audit Risk and Compliance Committee and our Board.

As with previous reporting periods, the Charter Hall Human Rights and Modern Slavery Working Group is responsible for assessing the effectiveness of current systems and processes and developing the strategies and initiatives that are then integrated into the broader business. The Working Group meets quarterly and comprises representatives from risk and compliance, procurement, operations and development, legal, people and sustainability. It is chaired by our Group Head of ESG and is sponsored by our Chief Finance Officer and Chief Experience Officer. The sustainability team and sector leads report through to sector leadership teams and fund Boards on the progress and implementation of initiatives for their sector and fund. Where a human rights or modern slavery risk has been identified, the Working Group implements our modern slavery principles and notification processes which guide our investigations and development of solutions.

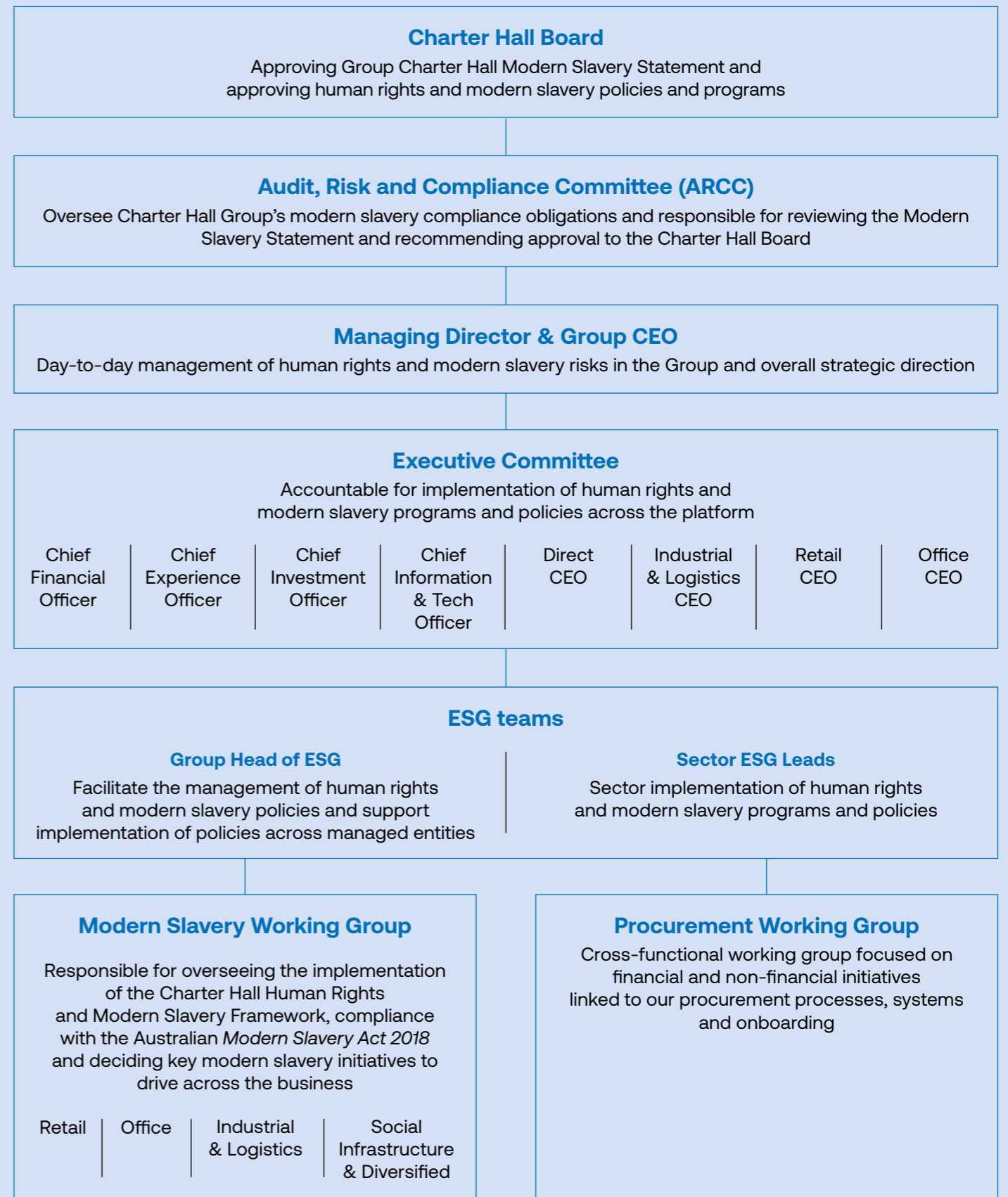
Procurement Working Group

This year we established a Procurement Working Group to harmonise our response to modern slavery, oversee the supplier onboarding process, rationalise the vendor database, coordinate common cross-sector procurement initiatives and improve controls over vendor selection.

This Working Group is made up of employees from across sectors and Group functions (such as Finance, Legal, ESG and Risk), supports our modern slavery risks management processes and is a forum to align both financial and non-financial outcomes in our supply chain.

In FY22, they redesigned the vendor onboarding process, started rationalising the vendor database and continue to explore ways reporting can be improved.

Governance structure



HOW WE MANAGE MODERN SLAVERY RISK

Key governance documents

Our human rights and modern slavery suite of policies remains consistent with previous years, with our Supplier Code of Conduct and the Sustainability Policy updated in FY22.

Human Rights Policy

Our approach to respecting human rights is guided by our Human Rights Policy. It is based on international human rights principles and applies to all our entities including those in which we hold a majority interest. We expect business partners and suppliers to uphold these principles and adopt similar policies within their own businesses.

Supplier Code of Conduct

For our suppliers we developed our Supplier Code of Conduct, which shares our commitments and principles and clearly communicates our expectations of them – including throughout their own supply chains – in providing products and services to us.

Employee Code of Conduct

Our Employee Code of Conduct defines the principles and the behaviours we embrace to operate safely, honestly and responsibly. It also requires us to treat each other and all stakeholders respectfully at all times.

Sustainability Policy

Our Sustainability Policy outlines our commitment, process and framework for our practices, management and reporting on sustainability.



Enhancing our modern slavery due diligence

We value the insights and opportunities gained from collaborating with industry in managing many modern slavery risks and continued investing in these partnerships throughout the year.

Cleaning Accountability Framework (CAF)

Business, union, government, academics and industry associations came together to form CAF as part of a whole-of-industry approach to end the exploitation of cleaners. With cleaning services identified as a higher risk segment for modern slavery, the CAF Certification Scheme provides a credible framework to measure social compliance within the cleaning industry. We were an early adopter of CAF in 2017. As a member, and through our representation on the CAF Advisory Committee, we advocate for sustainable change in the cleaning industry. We have now applied the CAF framework to all new cleaning contracts in our Office buildings and have four Office buildings CAF certified.

United Nations Global Compact Network Australia (UNGCNA) Modern Slavery Community of Practice

A group that shares emerging best practice to build common capability in addressing modern slavery human rights risk management among Australian businesses. In March 2019, we became a signatory to the UNGC and are aligning our strategy, culture, policies and day-to-day operations with UNGC principles on human rights, labour, environment and anti-corruption. We have prepared our third report providing communication on our progress, which outlines our actions against the principles established in FY21.

Property Council Modern Slavery Working Group

We are actively engaged in the Property Council Sustainability Roundtable, which established a Modern Slavery Working Group in 2019. The Working Group provides a collaborative approach to not only understanding our supplier chain modern slavery risk, but also building supplier capacity of our combined supply chain, while reducing the burden on our suppliers with multiple requests. This resulted in the creation of a supplier prequalification assessment, in partnership with Informed365. A Charter Hall employee is the Chair of this Working Group.

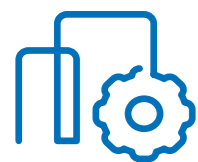
Supply Chain Sustainability School

We are members of the Supply Chain Sustainability School, which enables access to educational resources. The School also partners with the Property Council Modern Slavery Working Group to provide training to suppliers on the risks of modern slavery and how to identify and address these risks in their supply chains.

Social Traders Australia

Social Traders connect certified social enterprises with business and government members to create positive impact through jobs, community services and support for the most marginalised. As a member, we support social enterprises and vulnerable members of the community through our supply chain.

HOW WE MANAGE MODERN SLAVERY RISK



Management systems and controls

Agreements

In FY22, we reviewed our standard terms and conditions for suppliers providing us with goods and services. These terms and conditions apply to all capital works projects and ad-hoc purchase orders across the Group. Our standard terms and conditions now include modern slavery clauses including:

- Compliance with legislative requirements
- Development and maintenance of policies and procedures to avoid engaging in modern slavery
- Reporting to us following a complaint or incidence of modern slavery either by the supplier themselves or an entity in their supply chain

The roll-out of the updated terms and conditions will be finalised in FY23.

We also updated our Supplier Code of Conduct in FY22, outlining the requirements of all suppliers with respect to modern slavery and outlining the Protected Disclosure Service available to suppliers.

These updates form part of a broader set of requirements already in place that mandate:

- Existing suppliers review and accept the Supplier Code of Conduct
- New suppliers must sign our Supplier Code of Conduct as part of our onboarding process
- Suppliers in all sectors sign our Supplier Code of Conduct in CM3, a contractor safety management system
- All development and capital works projects include modern slavery clauses

Collaborating with suppliers

To help build a greater understanding of our supply chain, we have historically run a series of deep dive workshops. As the cleaning and security industries are at high-risk of exposure to modern slavery, we plan to run workshops with five of our cleaning and security suppliers in FY23 to help us better understand how we can work with our suppliers in these high-risk industries to identify, assess and mitigate risks.

Collaborating with partners

Across our Office and Industrial & Logistics sectors, we partner with CBRE, who procure and manage our property maintenance services. As part of their service agreement with us, CBRE are responsible for the management of modern slavery risks in their supply chain. Please see page 15 for more information.

Educating our people and suppliers

Education is a big part of effectively managing modern slavery risks and we have continued to build on the work we undertook last financial year to deepen our organisation's understanding of modern slavery. We use an employee guide to help our people and suppliers understand their responsibilities in identifying and responding to modern slavery incidents.

In FY22, all our people received modern slavery refresher training, including training on the process of reporting issues should they find or suspect modern slavery in our operations or supply chains.

These initiatives have resulted in:

100%

of employees being communicated to on the risks and responsibilities relating to human rights and modern slavery

100%

of employees completing training on human rights and modern slavery issues

We continued to train members of our Modern Slavery and Human Rights Working Group through our quarterly meetings by sharing industry best practice, challenges and brainstorming opportunities to strengthen our modern slavery response.



We have also continued to communicate with our suppliers on human rights and their responsibilities and provided further education resources through the Property Council modern slavery initiative, which we co-chair.

In addition, we have added modern slavery and working conditions as a permanent agenda item on the regular formal reviews held with suppliers on monthly and quarterly basis.

Last year, we became members of the Supply Chain Substantiality School (SCSS). In FY22, approximately 50% of our cleaning and security suppliers are members of SCSS and completed training on topics including modern slavery, sustainability and the environment.

Of these companies, approximately 200 employees, including executives, managers and operational employees, have undergone training on relevant modern slavery modules offered by the SCSS.

Auditing our cleaning suppliers and enabling the worker voice

With cleaning services identified as high-risk for modern slavery, Charter Hall became an early adoptee of CAF in 2017. As a member of CAF, we advocate for sustainable change in the cleaning industry.

In FY22, we maintained CAF certification of four office buildings in Melbourne and Sydney. Our two largest cleaning suppliers (by annual spend) are responsible for cleaning these buildings and are therefore included in the scope of these audits.

All four buildings participating in the annual health checks maintained their 3 Star certification, the highest currently awarded by CAF. We are working with our tenant customers and service partners to ensure that minor concerns that have been identified are corrected and practices improved to prevent them recurring.

We continued to work with CAF and the industry in FY22 to develop an approach to scaling these assessments across our portfolio and will continue this process throughout FY23.

While CAF audits are an important mechanism to understand the working conditions on site, we acknowledge that their effectiveness is limited by the comfort and willingness of cleaners to speak up. For this reason, CAF audits are often supplemented by CAF representatives who are cleaners that have received extra training on workers' rights. While they are not industrial relations experts, they can share their knowledge with other cleaners, build a sense of trust and encourage their cleaning co-workers to speak up if they have an issue.

We are fortunate to have a CAF representative as a cleaner at one of our CAF-certified buildings in Sydney to add another layer of support to cleaners raising their voice when faced with poor working conditions.

HOW WE MANAGE MODERN SLAVERY RISK



Grievance and remediation

We have an established procedure to enable us to receive grievances in relation to breaches of our Human Rights Policy. Our aim is for this procedure to meet UNGPs criteria for effectiveness, and it includes internal mechanisms to enable us to investigate and remedy grievances promptly.

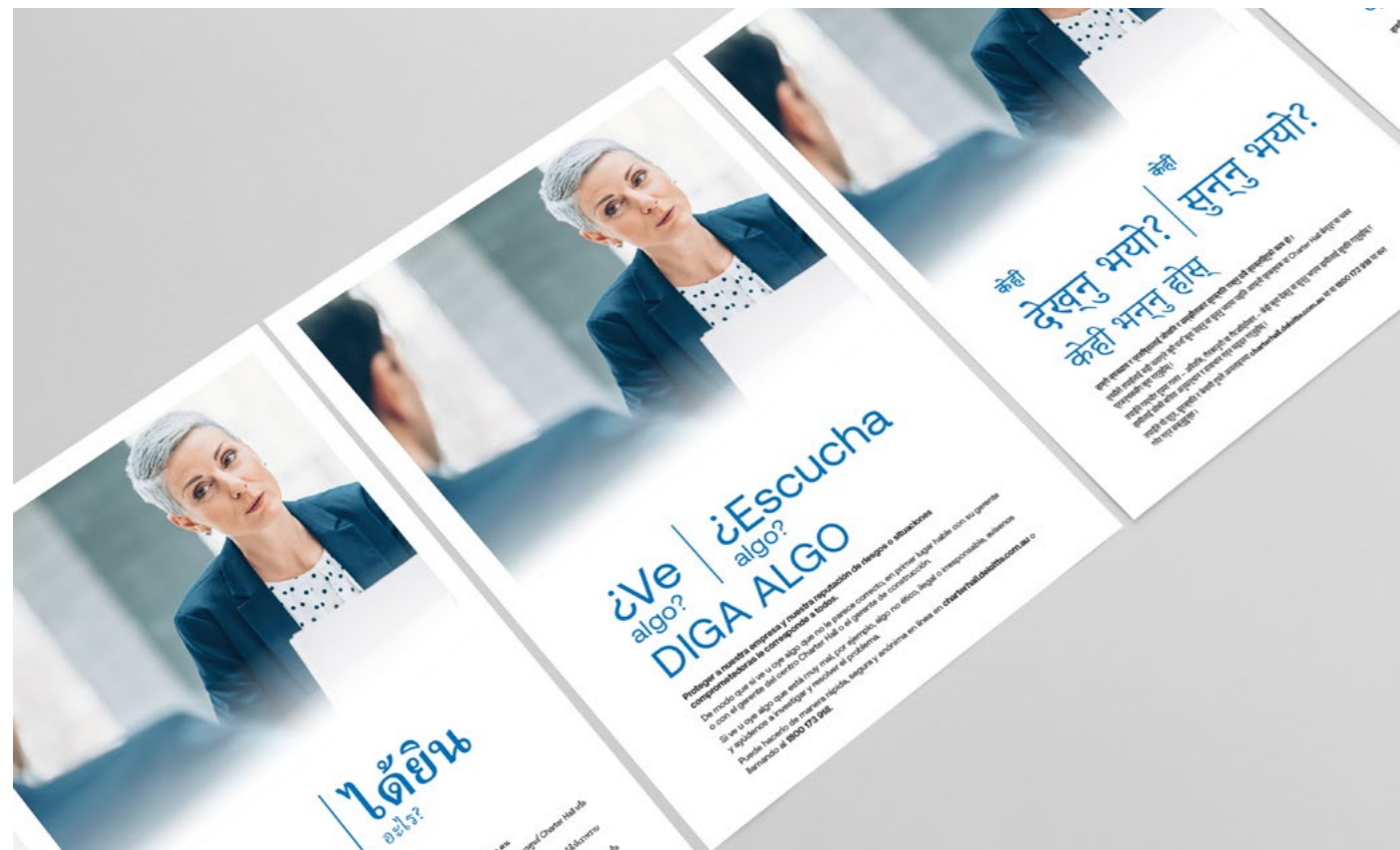
Our whistle-blowing hotline is supported by an additional check in our contractor sign-in system which we introduced last year. Before contractors sign out, the system asks them whether they 'would like to report anything that they saw or experienced when on site?'. Through regular engagement, we hope to encourage a speak-up culture that will allow us to respond before risky or inappropriate behaviours escalate.

In FY22, one matter was raised with a connection to modern slavery. The matter was investigated by Charter Hall directly with the supplier and the matter was found to have no merit.

In addition, CBRE operate a grievance procedure available through a grievance hotline or by emailing their compliance team. In FY22, zero cases of modern slavery were reported or identified through our Tier 2 suppliers engaged through CBRE.

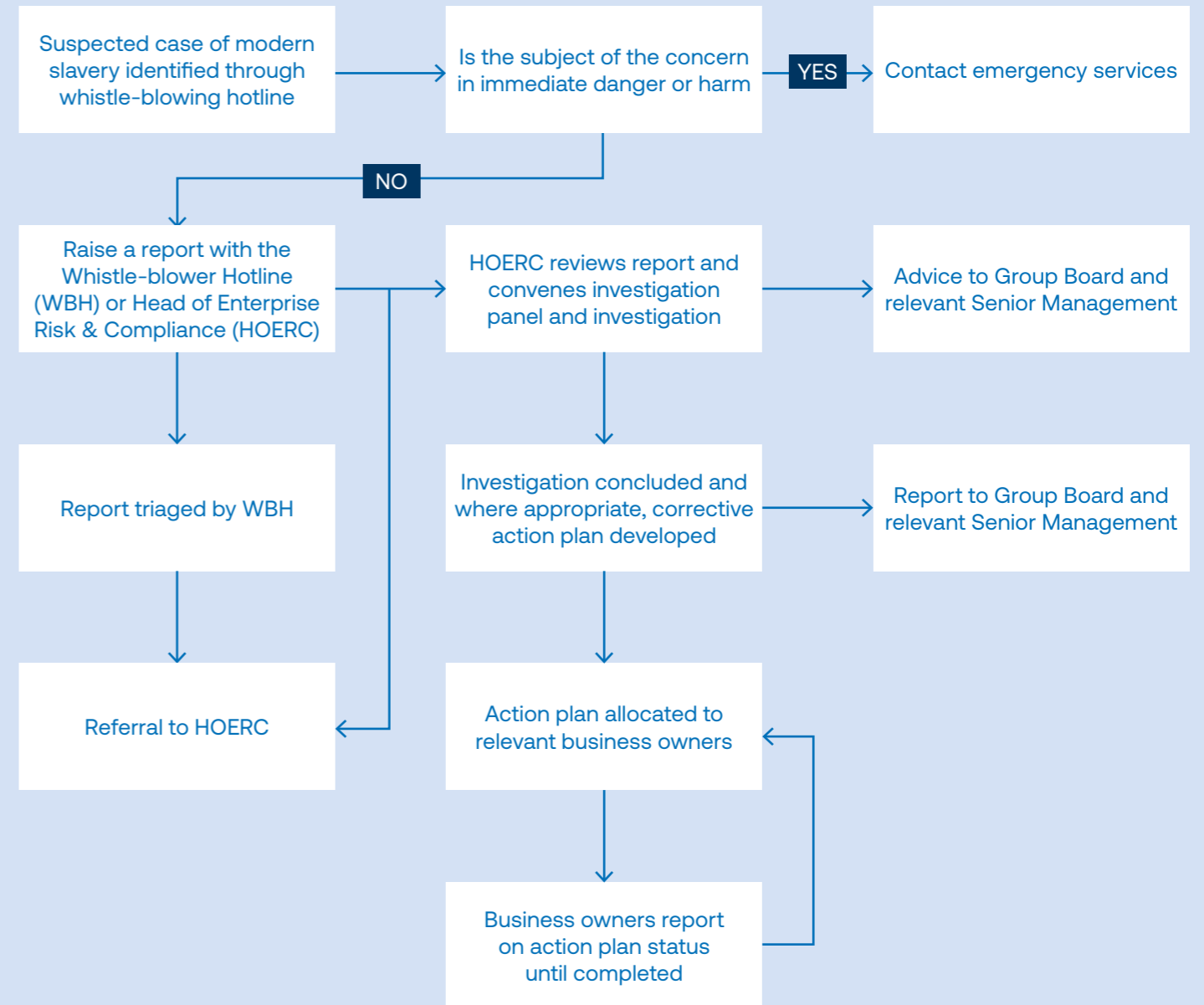
This year, we continued to promote our whistle-blowing hotline through multi-lingual posters (in seven different languages) to all service areas in our Retail, Office and Industrial & Logistics portfolio to cater for the different nationalities in our site teams.

In FY22, we commenced a process to review the effectiveness of this hotline for workers at our assets. This will continue in FY23.



Our modern slavery notification process

Our modern slavery notification process remains consistent with FY21 and focuses on working closely with our employees and suppliers to ensure effective remediation is achieved in a timely manner.



Assessing the effectiveness of our actions

Assessing the effectiveness of our response is a core requirement of reducing the risk of modern slavery in our operations and supply chains. We do this in several ways.

Within our business:

- We track our progress through meetings of our Human Rights and Modern Slavery Working Group, which assesses our progress against our implementation plan. Agenda items for the three meetings of the Working Group this year included:
 - Development and approval of the Modern Slavery Framework
 - Supplier spend analysis
 - Supplier data analysis
 - Onboarding of suppliers to the Property Council portal and responding to key findings
 - The content, achievements and challenges to be shared via the Modern Slavery Statement
- We provide regular updates at key progress milestones to the Charter Hall executives, ARCC and Board
- Provide annual updates for our sector leadership teams and entities
- Review and track suppliers quarterly on Informed365 Supplier Portal and CM3
- Review and analyse supplier responses to the Property Council supplier questionnaire, checking whether suppliers have actioned recommendations
- Monitor grievances and complaints

Our partnerships with a range of stakeholders provide us with further understanding of the effectiveness of our processes:

- In FY22, we commissioned a third-party consultant to complete a maturity assessment of our existing human rights and modern slavery approach. For further information, please see page 16.
- Our close engagement with the CAF and

certification of four buildings to CAF standards allows us to closely track compliance with labour standards in those buildings and thus monitor the effectiveness of our response











- A cleaner at one of our CAF-certified buildings is also a CAF representative, which means they can build trust and loyalty with their fellow cleaners and provide another layer of support to cleaners raising their voice when faced with poor working conditions
- The Supplier Deep Dive workshops conducted in FY21 (and planned for FY23) were a knowledge-sharing exercise to explore challenges and opportunities for collaboration. They helped us understand what was working well and where we could improve in our collaboration with suppliers and our overall modern slavery response
- The Property Council's Modern Slavery Working Group enables us to develop Australian and industry best practice and to exchange information with other property managers around the effectiveness of our actions
- The Property Council's supplier questionnaire enables us to understand how effectively our suppliers are managing their modern slavery risks. For more information, please see page 14.
- Through the UNGC Peer Group, we have another avenue to identify best practice, especially from industries with a long track record on managing human rights in their supply chains
- Through interaction with our investors, we gain an understanding of their expectations and practices

Summary of how we track the effectiveness of our actions

	How we track effectiveness	Frequency	KPIs
Listening to the voice of the worker	Four of our office buildings are CAF certified	Annual	<ul style="list-style-type: none"> - Number of CAF buildings audited and certified - Number of low to medium risk audit findings
	One of our CAF certified office buildings has a CAF representative cleaner to help capture feedback from fellow cleaners	Ongoing	
	Monitoring grievances	Ongoing	<ul style="list-style-type: none"> - Number of grievance allegations received through our grievance mechanism - Number of cases remediated
Understanding suppliers	Supplier questionnaire sent to 99% of our high-risk suppliers in the cleaning and security industries to understand how effectively they are managing their modern slavery risks	Ongoing	<ul style="list-style-type: none"> - Number of suppliers assessed for modern slavery risk through the Property Council supplier questionnaire
	Supplier Deep Dive workshops conducted with suppliers to explore challenges and opportunities for collaboration	Annual	<ul style="list-style-type: none"> - Number of workshops held
	Completion of supplier modern slavery surveys	Ongoing	<ul style="list-style-type: none"> - Number of supplier modern slavery surveys completed
Collaborating with peers	Engagement and knowledge sharing with the Property Council Modern Slavery Working Group	Monthly	<ul style="list-style-type: none"> - Number of Property Council Modern Slavery Working Group meetings attended
	Identifying best practice through UNGC Peer Group	Ongoing	<ul style="list-style-type: none"> - Number of UNGC Modern Slavery Working Group workshops attended
	Engaging with investors	Ongoing	<ul style="list-style-type: none"> - Number of investor modern slavery surveys completed - Number of meetings held with investors to discuss modern slavery
Seeking expert feedback	Engaged third-party consultancy to complete a maturity assessment of our existing human rights and modern slavery approach	As required	<ul style="list-style-type: none"> - Delivery of Modern Slavery Framework implementation steps
Engaging our business	Track our progress through meetings of our Human Rights and Modern Slavery Working Group	Quarterly	<ul style="list-style-type: none"> - Number of Modern Slavery and Human Rights Working Group meetings held - Number of employees completing modern slavery awareness training
	Updates to our executives, ARCC, Board, sector leadership teams and Group entities	As required	

Continued progress against focus areas

We monitor and disclosure our progress against our modern slavery focus areas. A summary of progress against our FY22 areas of focus is listed below.

Key focus	FY22 targets	Status	Comment
Governance	Undertake a modern slavery assessment to understand our current modern slavery maturity and identify gaps in our current modern slavery approach. This gap analysis will be used to develop a three to five year roadmap to develop a comprehensive and long-term approach to modern slavery across all sectors.		We engaged a third-party consultant to complete a maturity assessment of our existing human rights and modern slavery approach. The diagnostic found that we have already laid solid foundations to identify and manage modern slavery risk upstream within its value chain. The diagnostic assessment informed the development of a multi-year Modern Slavery Framework and a series of strategic recommendations which focused on helping us uplift our modern slavery response. For further information, please see page 16.
	Develop a plan for rolling out CAF audits more broadly across our portfolio.		We worked with CAF and the property industry over FY22 to develop a portfolio approach to CAF auditing. We will continue to work with them over FY23 to evolve this approach.
	Undertake annual spend analysis as part of our periodic modern slavery risk assessment to help us determine where modern slavery risks are most likely to be present in our operations and supply chain.		In FY22, we conducted an analysis of our annual supplier spend in high-risk categories. Our FY22 spend data shows that we engaged with 61 suppliers in the high-risk industries of cleaning and security. Fifteen of these suppliers accounted for over 90% of our spend.
	Review and assess the effectiveness of our grievance procedures.		In FY22, we kicked off a process to review the effectiveness of the grievance mechanism hotline for workers at our assets. This will continue in FY23.
	Publish annual UNGC Communication on Progress and Modern Slavery Statement.		This document serves as our third annual Modern Slavery Statement. We have prepared our annual UNGC Communication on Progress (COP) report providing an update on our progress.
Procurement	Onboard further suppliers onto the Property Council platform so that we can assess their current modern slavery risk controls and make key decisions on our risk assessment approach. We will focus on the labour-intensive industries of cleaning and security for the prequalification survey, which represents 76% of our high-risk spend across the Group.		In FY22, we adopted a risk-based targeted approach to assessment via the Property Council supplier questionnaire by focusing on our top high-risk suppliers in the categories of cleaning and security. The questionnaire was sent to 33 of our cleaning and security suppliers, representing 99% of our total cleaning and security spend across our Office, Retail and Industrial & Logistics sectors. In response, 31 suppliers completed the survey by end of June 2022, which represents a 94% completion rate.
	Expand the Supplier Deep Dive workshops across a broader range of suppliers to continue our understanding of suppliers' experiences and challenges in managing modern slavery and work together to achieve a better outcome.		We plan to expand the deep dive workshops with another five suppliers in the cleaning and security industries. While planning for these workshops was underway in FY22, the workshops will be conducted in FY23.
Education and engagement	Engage with tenants to understand how we can further collaborate to better manage modern slavery risks across our supply chains.		We regularly engaged with tenants on ESG plans and shared objectives, including modern slavery.
	Continue to develop employee competence on modern slavery with a focus on targeted learning sessions by role.		All employees completed a modern slavery refresher module in FY22.
	Collaborate with the SCSS to develop a supplier modern slavery learning strategy and identify relevant modern slavery and broader human rights training for our suppliers.		We became members of SCSS in FY21 and work with our high-risk suppliers to identify relevant modern slavery development opportunities. We continued to communicate with our suppliers on human rights and their responsibilities and provided further education resources.

 Achieved  In progress

Future steps

Identifying and managing our modern slavery risks is ongoing. We have several key initiatives planned to assist us in engaging with our suppliers and working with them to build capability.

Our refined Human Rights and Modern Slavery Framework, which provides a comprehensive and long-term approach to modern slavery, will guide our modern slavery initiatives over the next two to three years.

The below table summarises our FY23 targets.

Key focus	FY23 targets
Governance and human rights commitment	Update Human Rights Policy to include Charter Hall's most significant human rights risks, expectations of tenants and how we will respect human rights when faced with conflicting requirements.
	Update Whistle-blower Policy to specifically call out human rights and modern slavery concerns.
	Undertake annual spend analysis as part of our periodic modern slavery risk assessment to help us determine where modern slavery risks are most likely to be present in our operations and supply chain.
Management systems and controls	Conduct a human rights issue identification process (to be conducted periodically every three years) to identify the most current and emerging human rights risks in our supply chain, building on the risk assessment conducted in 2018 and our analysis of supply chain spend across spend categories and sectors.
	Create a human rights and modern slavery guidance document that provides an overview of our identified salient human rights risks, escalation pathways and case studies on how these are applied.
	Roll-out updated terms and conditions with enhanced modern slavery clauses, including compliance with legislative requirements, development and maintenance of policies and procedures and reporting of information.
	Update our human rights and modern slavery training to include information on our human rights and modern slavery risks and opportunities within the value chain.
	Enhance employee communication to raise awareness of the modern slavery notification process.
	Develop targeted modern slavery training modules for key functions who are identified as contributors to upstream and downstream modern slavery risks - for example, lease managers, centre managers and asset managers.
	Expand the Supplier Deep Dive workshops to continue our understanding of suppliers' experiences and challenges in managing modern slavery and work together to achieve a better outcome.
	Develop a plan for rolling out CAF audits more broadly across our portfolio.
	Onboard further suppliers onto the Property Council platform so that we can assess their current modern slavery risk controls.
Grievance and remediation	Research the effectiveness, accessibility and awareness of the Whistle-blower hotline.

Guide to this Statement

Modern slavery act criterion	Explanation	Page
1	(1)(a) Identify the reporting entity	3
2	(1)(b) Describe the structure, operations and supply chains of the reporting entity	4-10
3	(1)(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	11-15
4	(1)(d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	16-20
5	(1)(e) Describe how the reporting entity assesses the effectiveness of such actions	20-21
6	(1)(f) Describe the process of consultation with (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a (joint modern slavery) statement under section 14, the entity giving the statement	3
7	(1)(g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant	18



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Important information

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