

Modern Slavery Statement

Cairnton Holdings Pty Limited FY2020

This is a joint modern slavery statement covering the activities of Cairnton Holdings Pty Limited (ACN 008 394 134), Bareage Pty. Limited (ACN 060 526 865), Cavalane Holdings Pty Limited (ACN 080 695 754), Chatsworth Two Limited (CRN: 203126B), CPH Crown Holdings Pty Limited (ACN 603 296 804), Compress Holdings Pty Limited (ACN 088 047 974), Consolidated Press (Finance) Pty Ltd (ACN 001 557 035) and Cairnton Holdings Pty Limited's owned and controlled subsidiaries (collectively, the **Cairnton Group**) during the year ended 30 June 2020.

This is our first modern slavery statement under the *Modern Slavery Act 2018* (Cth) and sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains.

This statement has been approved by the Board of Cairnton Holdings Pty Limited on 23 March 2021.

About us

At the Cairnton Group, we recognise that respecting the human rights of those affected by our business activities is important, and we are committed to reducing the risks of modern slavery within our supply chains.

Our structure

Cairnton Holdings Pty Limited is a company incorporated in Australia with a registered office located at Level 39, 161 Castlereagh Street, Sydney. The Cairnton Group also has offices in Ireland and the United States.

Cairnton Holdings Pty Limited controls and operates multiple subsidiaries, including each member of the Cairnton Group. These subsidiaries operate in various industries and are located in Australia, Ireland, the United States, the Commonwealth of the Bahamas, Barbados, Mauritius, Malaysia, the Netherlands, Argentina and the Cayman Islands.

Our operations

The principal activity of the Cairnton Group is investment holding of primarily passive investments. We engage 72 full time employees, 21 casual employees, and 4 contractors globally. The group also engages ad hoc contractors from time to time.

The Cairnton Group's asset portfolio consists predominantly of non-controlled listed investments, the largest of which is an interest of 36.81% in Crown Resorts Limited. Other listed investments are predominantly in the United States.

We also have both freehold and leasehold property investments in Australia, the United Kingdom, Dubai, Argentina and the United States and a leasehold interest in an aircraft.

Our supply chain

The Cairnton Group supply chain falls into 2 broad categories:

- Operational and Corporate; and
- Asset Management.

Operational and Corporate

Operating and corporate key suppliers include:

- professional service providers (including legal, audit, tax, IT, insurance);
- landlords and ancillary services relating to rental of office space (including cleaning staff);
- incidental suppliers relating to office operations (office materials, courier services, security, parking, motor vehicles); and

- travel providers.

Asset Management

Key suppliers that support the Cairnton Group’s property investments and leasehold aircraft include:

- suppliers of regular property and equipment maintenance services;
- lessors of motor vehicles;
- providers of security services, utilities and insurance; and
- other aircraft and general incidental suppliers.

Our annual expenditure on our supply chain is relatively low. Our suppliers are located across numerous jurisdictions including Australia, the United States, Ireland, the United Kingdom, the Netherlands, Hong Kong, Argentina, the Commonwealth of the Bahamas, the Cayman Islands, Mauritius, Malaysia and Jersey.

Modern slavery risks

The Cairnton group consider the risks of modern slavery practices in our operations and supply chains to be relatively low, given our focus of operations in countries that have lower prevalence of modern slavery. Strong relationships with our suppliers of goods and services allow us to effectively monitor and address our supply chain risks.

We nevertheless recognise that modern slavery may impact our business activities and we endeavour to take responsibility for reducing the risk that we might contribute to modern slavery through our operations and supply chains.

Our Group has developed a risk assessment profile that considers our sector and industry, the products and services we acquire, and the geographic location of our operations as potential indicators of modern slavery risks. These indicators have been reviewed against industry guides including the [ACSI Modern Slavery Risks, Rights & Responsibilities Guide](#) and the [Global Slavery Index](#) to assess their level of risk.

Risk Profile

Risk	Description of risk
Sector / Industry	The Cairnton Group's business covers a wide range of sectors and industries. Our prominent business of investment holdings in tangible assets has minimal modern slavery risk.
Product / Services	<p>Our suppliers are mostly professional services providers engaged to operate and maintain our assets. Service procurement is identified as a high risk area for modern slavery (including building services, cleaning, logistics, travel, security and maintenance services). This risk rises when suppliers engage base skilled workers. Employees in these areas are at risk of having a lower understanding of working rights, exposing them to excessive work hours, underpayment and withheld wages.</p> <p>To manage this risk, the Cairnton Group generally engages directly with our supply chain to ensure fair working conditions, and pay premium amounts for the services they acquire. A large number of our service providers are skilled professionals in industries such as aviation, property, legal and tax, which present low risk.</p> <p>IT Procurement is also a high risk area for modern slavery. The extraction and manufacture of raw materials for IT components and the disposal of e-waste all present modern slavery risks.</p> <p>The Cairnton Group purchases IT equipment on a relatively small scale for a variety of uses and this equipment is purchased from reputable and large-scale retailers.</p>

Risk	Description of risk	Supplier	Prevalence Index Rank (out of 167)
Geographic	Cairnton Group's suppliers come from a wide range of countries, with the majority of our supplier spend in Australia and the United States. Both of these countries have a low prevalence of modern slavery.	Australia	163
		United States	158
		Ireland	147
	Malaysia, the Bahamas and Jersey present some modern slavery risks as they have a high prevalence rating or a lack of reporting. However, our suppliers in those jurisdictions are professional service providers only.	Barbados	112
		Bahamas	No data available
		Mauritius	161
		Malaysia	42
		Netherlands	143
		Hong Kong	156
		Jersey	No data available
	We continue to work closely with our other international suppliers to manage any risks associated with modern slavery.	Argentina	157
		United Kingdom	137

Actions to assess and address risk

The Cairnton Group acknowledge that there may be modern slavery risks associated with the products and services we acquire. This risk is considered to be low, as members of the Group have strong relationships with suppliers and source a majority of their supplies from low-risk nations. Regardless of the risk levels, we are actively taking the following steps to assess and address potential risks:

- engaging both internal and external lawyers, finance and HR personnel to ensure compliance with laws in all jurisdictions;
- commencing the process of raising awareness in our business lines of the risks of modern slavery. We will continue to do this to identify areas where we may be at risk, and take steps to mitigate those risks; and
- obtaining our goods and services from suppliers we have dealt with for many years. This leaves us confident in the quality of our suppliers employment conditions and supply chain operations.

Our current governance framework includes policies that assist in addressing modern slavery risks. The Cairnton Group has the following policies:

- Whistleblower Protection Policy – the Cairnton Group aims to deter wrongdoing by encouraging anyone making a disclosure of such to feel they can do so safely, securely and with confidence they will be protected and supported;
- Discrimination Policy – the Cairnton Group aims to treat all employees and contractors with fairness and free from discrimination; and
- Diversity and Equal Opportunity Policy – the Cairnton Group aims to foster diversity and equal opportunity in the workplace to fully utilise the potential of its employees and contractors.

Assessing our effectiveness

The Cairnton Group considers the risks of modern slavery in its supply chain to be low given the above assessment. However, we have commenced the process of considering how to best assess the effectiveness of the steps taken to address modern slavery in this initial reporting period. We will continue to review this, and develop our policies, procedures and training (as required) to evaluate risks to the Cairnton Group relating to modern slavery in our supply chain.

Consultation

The Cairnton Group operates collectively, and the policies, approaches and actions set out in this report apply to all entities in the group.

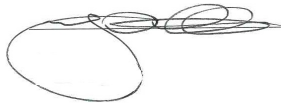
Prior to this report being approved by the board of Cairnton Holdings Pty Limited, executives and senior managers of our subsidiaries in Australia and overseas reviewed this statement.

FY2021 focus

As this is our inaugural statement, we recognise that there are further steps we can take to assess and address the risks of modern slavery in our operations and supply chains.

In FY2021 we will focus on continuing to monitor for any modern slavery risks within our supply chain.

This statement was approved by the Board of Cairnton Holdings Pty Limited for and on behalf of all reporting entities in the Cairnton Group it controls on 23 March 2021.

A handwritten signature in black ink, appearing to read 'Michael Johnston', with a large, loopy flourish underneath.

Michael Johnston
Director