

ISPT MODERN SLAVERY STATEMENT

FOR THE FINANCIAL YEAR ENDED 30 JUNE 2023

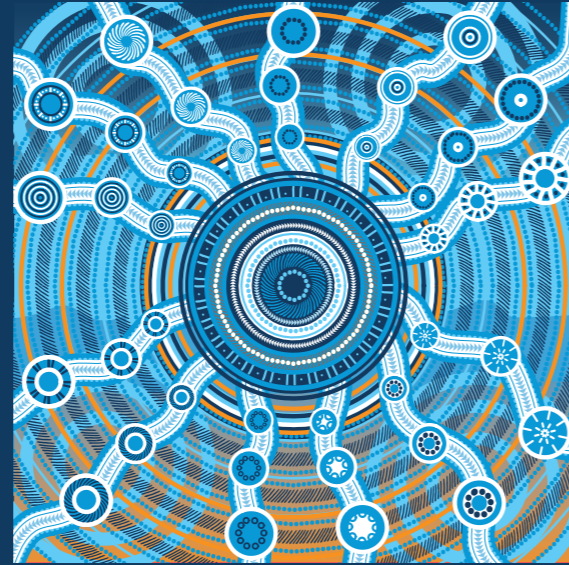


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Acknowledgement of Country

ISPT acknowledges the Traditional Custodians of the lands on which our business and assets operate, and recognises their ongoing connection to land, waters and community. We pay respect to First Nations Elders past, present and emerging.



Invested in all, the richer we grow.
Artwork by Wakka Wakka artist, David Williams.

ABOUT THIS STATEMENT

MANDATORY CRITERIA FOR MODERN SLAVERY STATEMENTS UNDER THE AUSTRALIAN MODERN SLAVERY ACT		DISCLOSURE REFERENCE
Criterion 1	Identify the reporting entity	Page 3
Criterion 2	Describe the structure, operations and supply chains of the reporting entity	Page 8
Criterion 3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Page 17
Criterion 4	Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Page 30
Criterion 5	Describe how the reporting entity assesses the effectiveness of these actions being taken to assess and address modern slavery risks	Page 38
Criterion 6	Describe the process of consultation with any entities the reporting entity owns or controls	Page 3
Criterion 7	The Year Ahead	Page 40-41

This Modern Slavery Statement (Statement) for ISPT is made under the Australian Modern Slavery Act 2018 (Cth) (Modern Slavery Act) for the financial year ended 30 June 2023.

ISPT includes ISPT Pty Ltd, ISPT Operations Pty Ltd, the relevant trusts for which ISPT Pty Ltd, ISPT Nominees Pty Ltd and ISPT Custodians Pty Ltd are trustee and other related bodies corporate of ISPT Pty Ltd within the meaning of the Corporations Act 2001 (Cth) (collectively referred to as **ISPT**).

ISPT Pty Ltd is trustee for the following main ISPT trusts:

- Industry Superannuation Property Trust No.1 and ISPT Industry Superannuation Property Trust No.2 (collectively referred to as the ISPT Core Fund)
- ISPT 50 Lonsdale Street Property Trust
- ISPT Retail Australia Property Trust No.1 and ISPT Retail Australia Property Trust (collectively referred to as IRAPT)
- ISPT Community Infrastructure Property Fund

This Statement is submitted as a joint statement by ISPT Pty Ltd for the ISPT Core Fund and IRAPT, both of which qualify as reporting entities under the Modern Slavery Act. ISPT Pty Ltd and the other trusts and corporate entities within ISPT listed above do not qualify as reporting entities but are reporting voluntarily under section 6 of the Modern Slavery Act, as they operate under the same policies and management and share in ISPT's commitment to responsible business practices. For an overview of the relevant corporate structure and reporting entities, please see Annexure A - Our Corporate Structure.

As trustee, ISPT Pty Ltd is responsible for the above trusts and their assets, and ISPT Operations Pty Ltd provides investment management services to those trusts. ISPT has consulted a range of internal stakeholders and an expert external business and human rights advisory firm in preparing this Statement. Copies of the Statement were provided by ISPT Pty Ltd (the reporting entity giving this Statement) to the other reporting entities covered by the Statement as part of the consultation process. Through this process, the entities that

are owned or controlled by the reporting entities were also consulted as they share the reporting entities' directors and management.

This Statement and its disclosures only apply to co-ownership arrangements and co-venture investments in which an ISPT entity has operational control, either under the relevant co-ownership agreement or other governing document.

This Statement does not cover co-ownership and co-venture activities where an ISPT entity is an investor, without an active role in operational matters. In particular, it does not apply to any non-managed co-ownerships, although where possible we have set our expectations for alignment by our partners with our core standards, which include ongoing respect for human rights.

ISPT has not consulted with its co-owners and co-venture partners for the purpose of this Statement and does not make any representations about the supply chains, operations or governance of those entities.

This statement was approved by the board of ISPT Pty Ltd on 13th December 2023. ISPT Pty Ltd is a 'higher entity' within the meaning of section 14(2)(d)(ii) of the Modern Slavery Act 2018 (Cth), being the entity in a position to influence or control each other reporting entity covered by this statement.

This statement is signed by Rosemary Hartnett (Chair of the Board of Directors of ISPT Pty Ltd) and Chris Chapple (Chief Executive Officer of ISPT Pty Ltd).


Rosemary Hartnett
Chair
ISPT Pty Ltd


Chris Chapple
Chief Executive Officer
ISPT Pty Ltd



OUR COMMITMENT

This Statement is an expression of our beliefs as a socially responsible business, including our commitment to respect human rights and an extension of our 'do no harm' investment and operating philosophy.

We support the Australian Government in its drive to end modern slavery and we are dedicated to making a difference in the lives of the people impacted by exploitation.

Whilst only some of the entities within ISPT fall within the disclosure threshold of the Modern Slavery Act, we have taken a whole-of-organisation approach to modern slavery, including reporting. We acknowledge the role we play as one of Australia's largest property businesses and are committed to taking steps to prevent and address any potential involvement we could have in modern slavery in our operations and supply chains and to ensure our accompanying policies and practices are meaningful and effective.

We align our response with international business and human rights standards, including the UN Guiding Principles on Business and Human Rights. This also supports our broader respect of human rights, outlined in our Human Rights Policy.

HIGHLIGHTS FY2023

This is the fourth Statement we have published under the Modern Slavery Act.

FY2023 marks the start of our new three-year modern slavery workplan. This workplan builds on our foundational work and will support us to further refine our approach in areas such as risk identification and management, stakeholder engagement and industry collaboration.

Our approach is grounded in four workstreams – Assess, Control, Integrate, Review – which work in tandem to support our approach to modern slavery and wider human rights issues.

This Statement is structured around these workstreams and provides an insight into our activities during FY2023.

RESPONDING TO THE EVOLVING MODERN SLAVERY LANDSCAPE

The modern slavery landscape in Australia and globally continues to evolve. The 2023 [Global Slavery Index](#) revealed that 50 million people globally are living in modern slavery, an increase of 10 million people since 2018. Closer to home, Australia has an estimated prevalence of 41,000 people living in modern slavery according to the Global Slavery Index. These figures provide a strong reminder of the critical importance of our work to combat modern slavery and the need for strengthened collective action in this area. As such, we welcome the Australian Government's review of the Modern Slavery Act and look forward to working with all stakeholders in its next phase.

REFINING OUR APPROACH AND ENGAGEMENT

In line with our new three-year modern slavery workplan, during the reporting period, we have focused on refining our due diligence approach including strengthening our engagement with suppliers and leveraging industry collaboration. Our priority remains on targeting sectors within our supply chains which have been assessed as higher risk for modern slavery, such as construction, cleaning services, security services, and waste management.

We have also strengthened our grievance mechanisms by including human rights violations including modern slavery, within our internal health and safety incident reporting platform called SHIELD. SHIELD gives our employees, and our external business property partners the ability to report any instances of human rights (including modern slavery) incidents. Activities to promote awareness of the mechanism have commenced and will continue in FY2024.

STRENGTHENING INDUSTRY AND MULTI-STAKEHOLDER COLLABORATION

We recognise that meaningful and effective modern slavery action requires a collaborative approach. An overview of the [Cleaning Accountability Framework](#) is provided on page 27. Multi-stakeholder collaboration is a powerful tool and a core component of our modern slavery response. Our work with the Cleaning Accountability Framework continues to be a cornerstone of our risk management approach and we are making important progress towards our targets of having our entire property portfolio certified by 2025. We have also continued our partnership with the Cleaning Accountability Framework to develop a Portfolio Rating framework. We expect this new framework will lead to a more efficient certification process and broad-ranging positive outcomes for cleaners and other supply chain stakeholders including property management companies.

Over FY2023, ISPT also collaborated with industry peers through the Property Council of Australia to share our learnings from our work to combat modern slavery and provided input into an industry submission to the Australian Government's review of the Modern Slavery Act. We have also continued to draw insights on our modern slavery risks from the Property Council of Australia Supplier Engagement Platform.

CONTINUOUSLY IMPROVING OUR APPROACH AND PRACTICES

We recognise that tackling modern slavery is an ongoing process and we remain focused on continuously improving our governance frameworks, policies, and practices to effectively address our modern slavery risks. As we implement our new workplan, we will continue to refine our approach, form trusted partnerships, and expand our influence through engagement with industry bodies to work to keep modern slavery high on the public policy agenda.

At ISPT we know what we stand for, and we lead by example so our suppliers and business partners know our expectations too. ISPT is focused on supporting fair pay for our cleaners, working to eliminate modern slavery in our business dealings and seeking to positively impact the livelihoods of workers and stakeholders across our supply chains. As we embark on the next phase of our new workplan, we look forward to collaborating with our stakeholders, including employees, suppliers, customers, industry peers and civil society, to effect meaningful change.

CONTINUOUS IMPROVEMENT

The following table outlines the key actions we have taken over the last four years and shows the evolution of our modern slavery response.

	01 ASSESS	02 CONTROL	03 INTEGRATE	04 REVIEW
FY2020-FY2022 WORKPLAN	Conduct due diligence to understand the inherent modern slavery risks across our operations and supply chains.	Adopt appropriate strategies to address identified modern slavery risks and use industry influence to make positive impact.	Manage modern slavery risk by embedding appropriate risk management actions across the business.	Monitor and assess the effectiveness of modern slavery risk management processes against appropriate tracking mechanisms.
	ASSESSMENT & ENGAGEMENT KEY INITIATIVES Risk Assessment <ul style="list-style-type: none"> Established methodology for risk assessment through ISPT Modern Slavery Risk Assessment Matrix Commenced systematic annual assessment of suppliers Externally assessed modern slavery risks in workforce Identified solar panels as a tier 1 supplier in High Spend- High Risk Category 	Suppliers <ul style="list-style-type: none"> Completed incorporation of modern slavery clauses in key contracts including cleaning and security Established awareness campaign for suppliers' workers on ISPT sites Expanded property partners' role in educating workers and extending ISPT's vigilance on workers' welfare Updated ISPT Supplier Code of Conduct Launched first webinar training on ISPT Supplier Code of Conduct and Modern Slavery to six Electrical suppliers Tender <ul style="list-style-type: none"> Introduced tighter pre-selection criteria related to modern slavery Expanded pre-selection to more sectors, including Electrical and Mechanical Industry influence <ul style="list-style-type: none"> Launched PCA Platform through PCA Introduced CAF certification and collaborated with CAF to develop Portfolio Rating Framework 	INTERNAL CONTROLS Governance <ul style="list-style-type: none"> ISPT Modern Slavery Working Group convened regularly Policies <ul style="list-style-type: none"> Introduced new and fine-tuned existing policies on human rights, supplier conduct, sustainable procurement and whistleblowing to better address modern slavery risks Grievance mechanisms <ul style="list-style-type: none"> Introduced LifeWorks Whistle-blower Hotline Developed framework for grievance resolution Workforce <ul style="list-style-type: none"> Accreditation and specialised training for dedicated teams Mandatory modern slavery training implemented across ISPT 	Internal audit program <ul style="list-style-type: none"> Conducted reviews with key internal stakeholders Included modern slavery reviews in Internal Audit Plan Modern Slavery Risk Review <ul style="list-style-type: none"> Continued assessment of existing and emerging risks Evolved approach with increasing focus on workers
FY2023	Risk Assessment <ul style="list-style-type: none"> Revised the ISPT Modern Slavery Risk Assessment Matrix to include new high-risk areas and distinguish between risks relating to labour and materials (to be finalised in FY2024) 	Suppliers <ul style="list-style-type: none"> Continued supplier training and engagement with a focus on cleaning and security Continued a deep dive collaboration with partners in the construction industry and commenced a deep dive in the security industry Tender <ul style="list-style-type: none"> Reviewed and updated our tender assessment Industry influence <ul style="list-style-type: none"> Continued our collaboration with CAF to develop the Portfolio Rating Framework Engaged in the Australian Government's review of the Modern Slavery Act through the Property Council of Australia 	Training <ul style="list-style-type: none"> 97% completion of modern slavery training (as of 14 July 2023) Grievance mechanisms <ul style="list-style-type: none"> Strengthened our remediation approach by including human rights violations, including modern slavery, within our SHIELD online reporting platform 	Modern Slavery Risk Review <ul style="list-style-type: none"> Developed metrics to assess the effectiveness of our modern slavery response (to be finalised in FY2024)

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

ISPT is a leading Australian property fund manager, with high quality properties and funds under management of \$21.5B (as at 30 June 2023). We operate a unique profit-to-investor business model and are committed to responsibly placing investors' funds in the property sector to optimise returns.

ABOUT ISPT

Established in 1994, ISPT owns a significant property portfolio across the office, retail, industrial, education, health & life sciences, accommodation and social infrastructure property sectors.

ISPT manages several property trusts, including the ISPT Core Fund, the largest investor-owned wholesale fund and one of the largest multi-sector property investment vehicles in Australia.

For nearly 30 years, we have created value for our investors, who include some of Australia's largest superannuation funds, public sector superannuation funds and investment funds. These investors collectively represent more than 50% of working Australians who have placed their retirement savings in those funds. Our investment is focused in Australia, and we currently do not have any international operations or own any international properties.

Information on our governance framework is included at page 30.

ISPT PURPOSE, VISION AND VALUES

At ISPT, we are driven by our purpose of creating better futures and our vision is to be the first choice for investors, people and partners. Our purpose and vision are enabled through our DNA and supporting behaviours. In September 2023, we updated our corporate values and launched the ISPT DNA. The ISPT DNA helps us positively impact the lives and futures of our people, our investors, partners, customers and communities. We believe that our DNA are not just words on paper but the driving force behind the impact we create. They provide a compass that directs our policies, actions and engagement. Taking action to manage modern slavery risks aligns with our DNA, including our commitment 'we balance people, profit and planet'.

RESPONSIBLE INVESTING

We act ethically and responsibly, believing that socially and environmentally sustainable initiatives create long-term value for our investors and customers, and ultimately, the communities we serve. The principles of responsible investing, including respect for human rights and freedom from slavery, are embedded throughout our investment processes, as set out in the ISPT Responsible Investment Policy and the ISPT Human Rights Policy. Our goal is to seek opportunities that deliver risk-adjusted returns throughout the property cycle while responsibly placing investors' capital in property.

OUR PEOPLE

During FY2023, we employed a workforce of 203, operating from Melbourne, Sydney, Brisbane, Perth, and Canberra. As at 30 June 2023, we employed 175 full-time, 14 part-time, 7 fixed-term and 14 contracted or temporary workers across investment and development management, office support, operations, finance, legal and other functions.

THE ISPT ESG STRATEGY

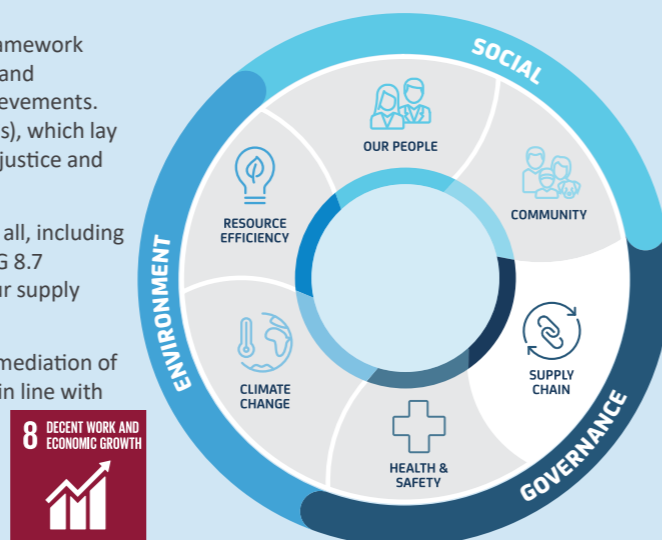
Our approach to responsible investment is underpinned by our commitment to environmental, social and governance (ESG) excellence with a 'do no harm' investment and operating philosophy.

Our ESG Framework represents the full scope of our ESG strategy. The Framework addresses the issues of greatest importance for our investors, customers and communities, and helps us to monitor and manage our activities and achievements. It is aligned with the United Nations Sustainable Development Goals (SDGs), which lay out an ambitious pathway to end extreme poverty, fight inequality and injustice and protect the planet.

ISPT shares the ambitions of SDG 8 to create a better economic future for all, including through promoting sustainable growth and decent work. Specifically, SDG 8.7 underpins our priority to address the modern slavery risks identified in our supply chains.

We also recognise our responsibility to provide for or cooperate in the remediation of human rights harm, which we identify we have caused or contributed to, in line with the UNGPs, which could include modern slavery related harm.

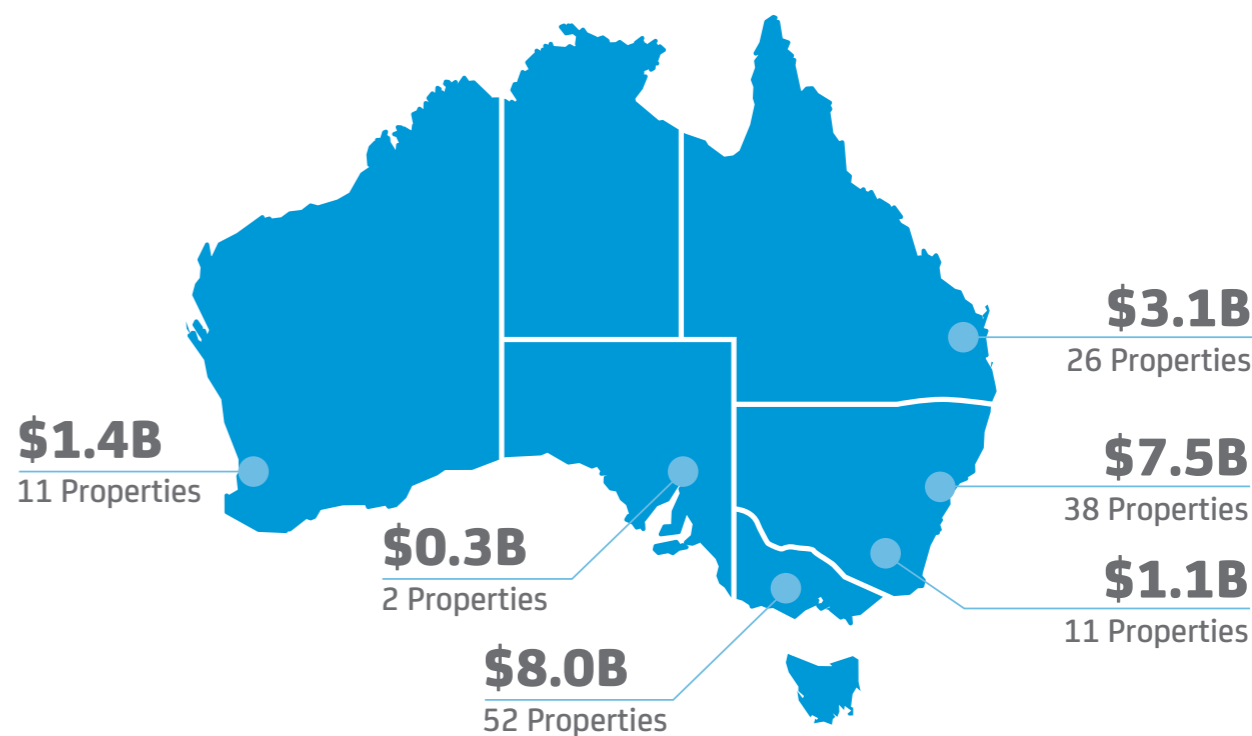
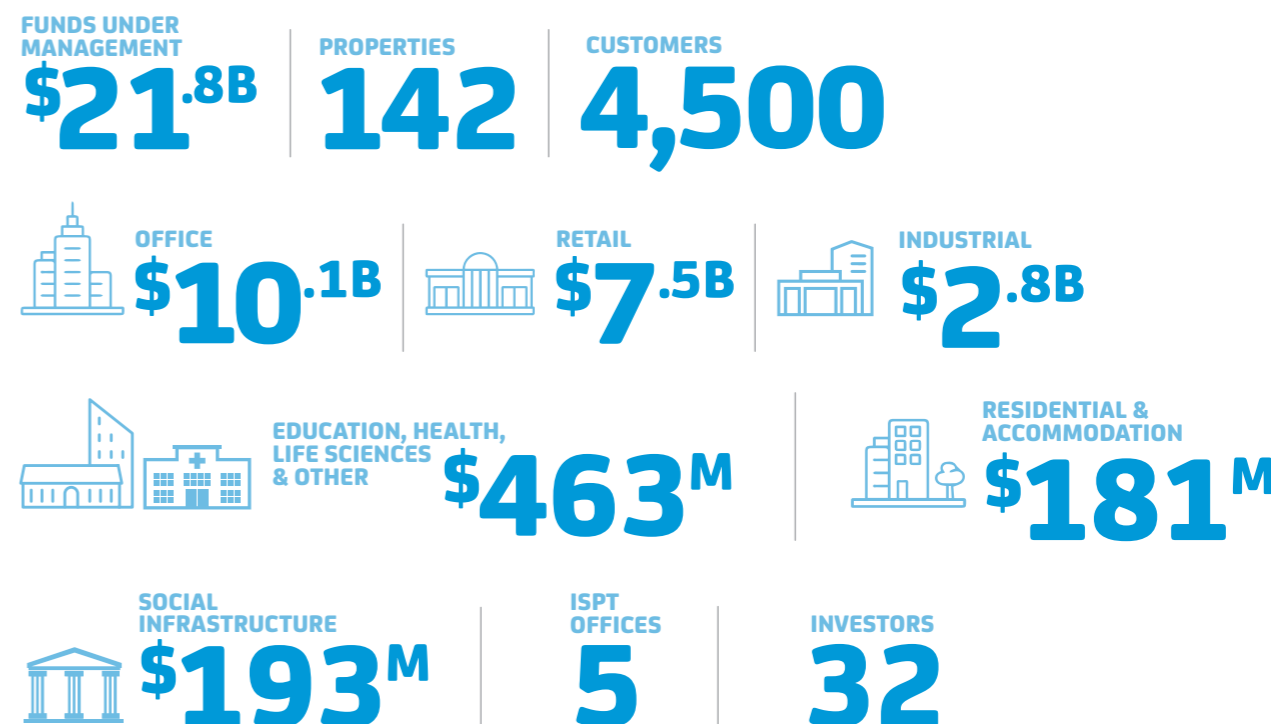
More broadly, we also seek to drive positive changes through our investment decisions and industry influence, including in areas such as modern slavery.



OUR PRESENCE

We own some of the most recognisable properties in Australia. Our mission is to deliver high-quality places that enable economic, social and environmental growth, where people thrive in their day-to-day activities. ISPT invests in Australian property and currently does not own any investments or have any operations overseas.

ISPT - 30 JUNE 2023





171-209 Queen Street, Brisbane

FUND AND INVESTMENT MANAGEMENT

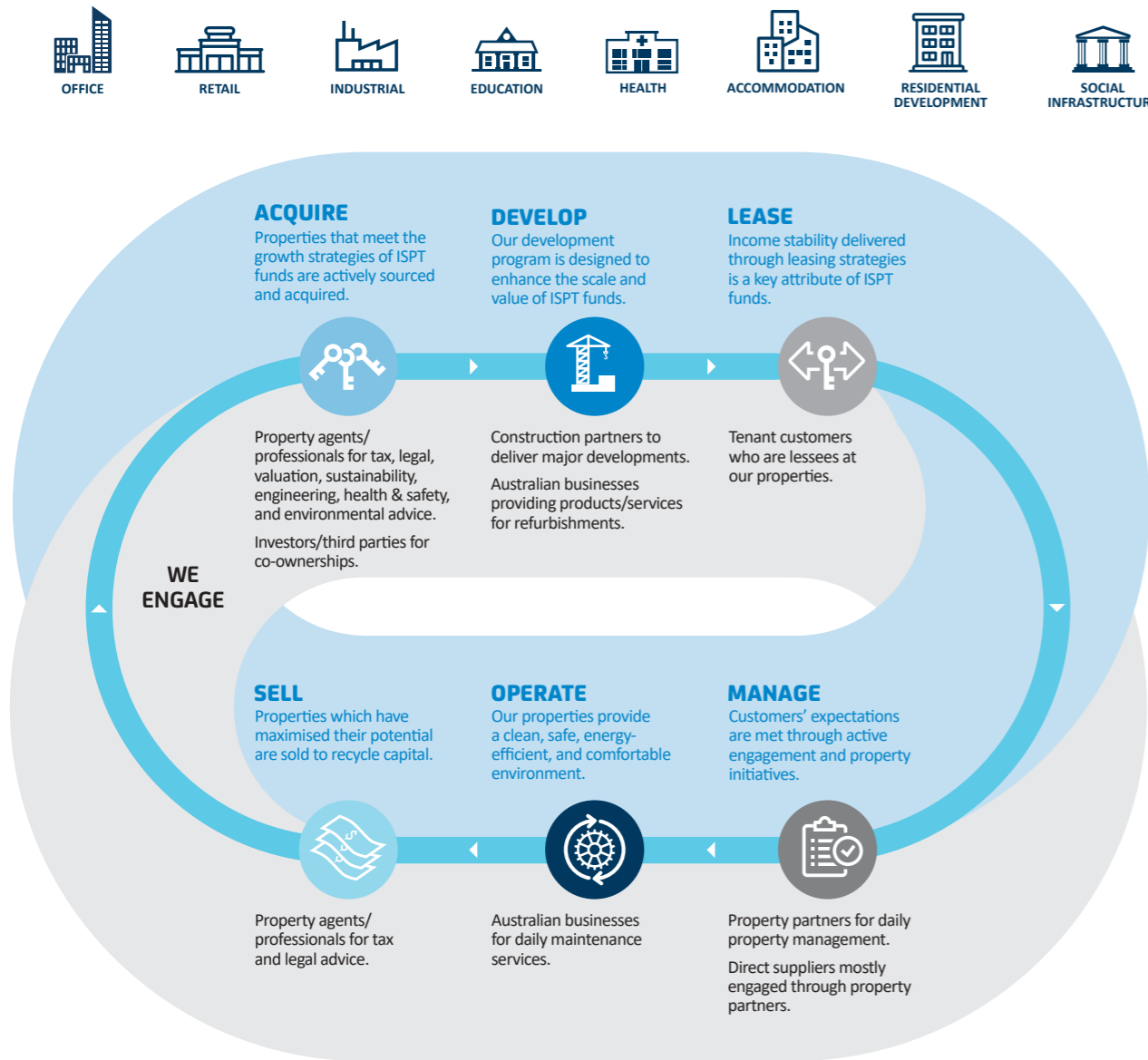
As a property fund manager for superannuation funds, we derive capital from the pooled investor equity and debt facilities from Australian and international capital markets. Our core activity is the investment management of our extensive property portfolios (office, retail, industrial, education, health and life sciences, accommodation and social infrastructure property) as shown in our value chain (see page 12). Through our investments and property management practices, ISPT aims to provide stable and competitive returns for our investor members while contributing positively to the communities and environments in which we operate.

Our investors include some of Australia's largest industry superannuation funds.

AMIST Super	JANA
Ausbil Investment Management	Meat Industry Employees' Superannuation Fund
Ausbil Marist Fathers	Melbourne Anglican Trust
Australian Construction Industry Redundancy Trust	Mercer Super
Australian Retirement Trust	Mine Super
AustralianSuper	REI Super
Basellandschaftliche Pensionskasse (BLPK)	State Super
Building Employees Redundancy Trust	The University of Melbourne
CareSuper	TWUSUPER
Catholic Church Insurance	UniSuper
Cbus	Victorian Funds Management Corporation on behalf of:
Emergency Services & State Super (ESSPlan)	• ESS Super
First Super	• ESSS Defined Benefits Fund
Funds SA	• Transport Accident Commission
HESTA	• Victoria Managed Insurance Authority
Hostplus	• WorkSafe Victoria
	Vision Super

As at 30 June 2023.

ISPT VALUE CHAIN



OUR SUPPLY CHAINS AND PROCUREMENT SPEND

ISPT's procurement spend on goods and services predominantly stems from these three key business functions across our operations.

PROPERTY DEVELOPMENT

Property development is our largest area of spend. Delivery of major developments is outsourced to construction partners. As head contractors, our construction partners are selected through a competitive process and formally appointed with an agreement that includes modern slavery related clauses. The modern slavery related clauses address a range of issues including compliance with ISPT's policies and procedures, record keeping, sub-contracting, training and education, access to premises and personnel for auditing purposes and disclosure of any actual or suspected instances of modern slavery. During FY2023, our major construction partners included companies like Buildcorp, FDC, Roberts & Co and Qanstruct. These companies are registered on the Property Council of Australia Platform.

Our head contractors are responsible for sourcing labour and materials used for our development projects, including by working with a range of subcontractors and suppliers.

PROPERTY OPERATIONS

Property operations is our second largest area of spend and includes a range of management, maintenance and other professional services.

Property management

Property management is outsourced to professional property management companies (known as our property partners) engaged through a Property Management Agreement. During FY2023, our property partners included leading global organisations – Jones Lang LaSalle, Colliers, CBRE and Knight Frank.

Our property partners are responsible for operational management of supplier relationships and suppliers' performance. While the property partners are responsible for the operational management, most suppliers have a direct contractual relationship with ISPT which includes modern slavery related clauses. These clauses outline ISPT's expectations of the supplier including that it has the necessary documentation, systems and controls in place.

Maintenance services

Daily maintenance services to keep our buildings clean, safe, and secure are outsourced to organisations across Australia under the ISPT Services Contract.

Large expenditure categories include cleaning services, on-site security services, waste management, mechanical (heating, ventilation, air conditioning (HVAC) services), electrical services, fire equipment maintenance and vertical transportation (lifts, escalators and travelators) maintenance.

Suppliers are not permitted to sub-contract the services without ISPT's prior consent. ISPT has a direct contractual relationship with these suppliers, however as previously outlined, our property partners are responsible for the operational management of these suppliers.

Professional services

Professional service suppliers are engaged to provide specialised expertise under the ISPT Consultancy Services Agreements or similar arrangements.

They include external consultants and professionals engaged both at asset and corporate levels to provide expert advice on areas, including tax, legal, valuations, sustainability, engineering, health, safety and environment, customer experience and wellbeing.

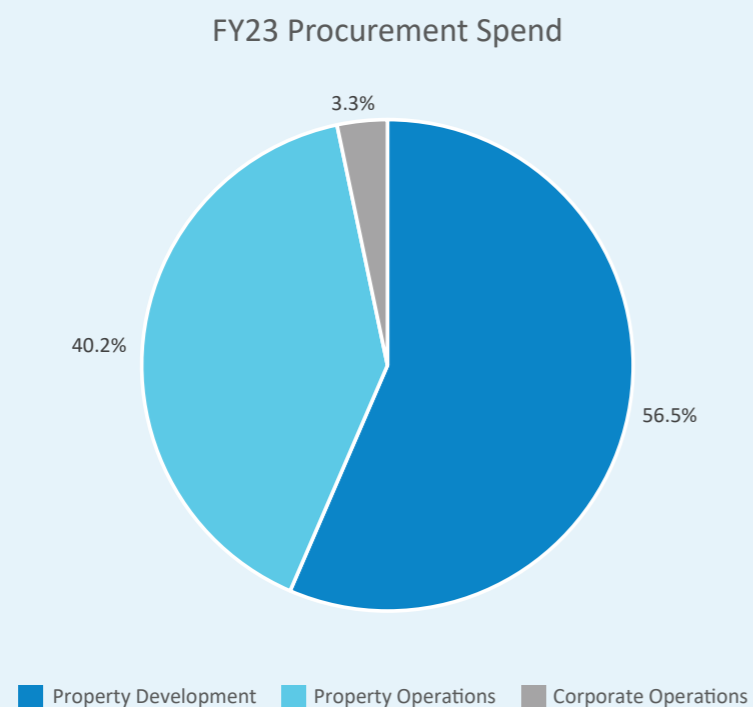
CORPORATE OPERATIONS

Where possible, we source goods and services from a wide network of Australian suppliers to support our corporate operations. This includes promotional goods, information and research, communication and technology products and services as well as professional and financial services. While our suppliers may be Australia based, they may source some components, parts or products from overseas.



PROCUREMENT SPEND AND LEVERAGE

This chart illustrates our procurement spend across key business functions. Our spend in these business functions is one of the factors we consider when mapping our response to supplier risks. Based on our assessment of leverage outlined in the following section, we have also considered the overall leverage we have for each procurement category.



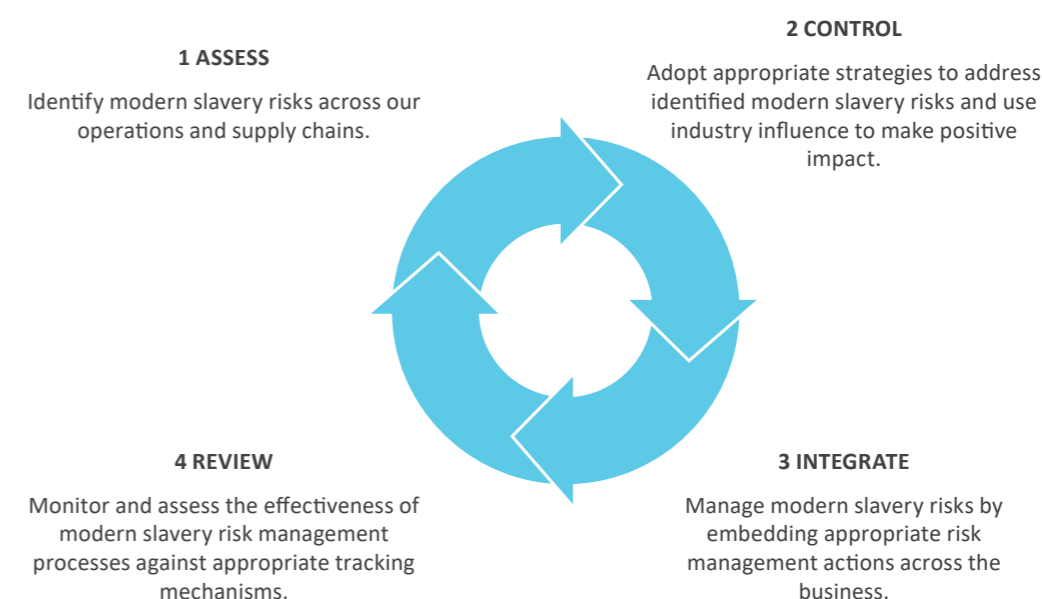
HOW WE ASSESS OUR ABILITY TO INFLUENCE SUPPLIERS' ACTIONS ON MODERN SLAVERY RISKS

In line with the UN Guiding Principles on Business and Human Rights, we recognise the importance of building and using leverage to encourage our suppliers and other business partners to take action in the area of modern slavery, particularly in instances where we may potentially contribute or be directly linked to modern slavery practices. We are looking at ways to build and exercise our leverage including through industry and multi-stakeholder engagement and collaboration. While the amount of leverage we have to influence our suppliers constantly evolves, the following table outlines where we believe we currently have the most leverage.

LEVERAGE	NATURE OF RELATIONSHIP
High	We believe we have a high degree of leverage with suppliers that we contract with directly, where we have an ongoing relationship with the supplier and our spend is a significant component of the supplier's overall revenue. Where we come together with industry and other stakeholders on issues, such as cleaning, we also have an increased ability to influence suppliers.
Medium	We believe we have moderate leverage with suppliers we have a direct relationship with but may have less influence due to market dynamics, or where the supplier is a specialised supplier with limited alternatives, or we have a smaller share of the supplier's overall revenue. In these instances, we may look for opportunities to build leverage including by conducting regular meetings with management.
Low	We believe we have less leverage in instances where our spend with the supplier is a small amount of their overall revenue (for example, airlines and hotels), the supplier has a one-off or short relationship with ISPT, or we don't have a direct relationship with the supplier (for example, they are in tier-2 and beyond). In such instances, we may seek to build leverage by collaborating with industry peers (e.g. through the Property Council of Australia) and suppliers across our value chain (e.g. construction partners and property partners).

ISPT MODERN SLAVERY RISK MANAGEMENT STRATEGY

Our modern slavery risk management strategy is pillared on four workstreams, working in tandem to support our approach to respecting human rights, including modern slavery.



FY2023 HIGHLIGHTS

During FY2023 we have continued to refine and strengthen our modern slavery risk management strategy. Key actions include:

- Commenced our new three-year Modern Slavery Workplan
- Revised the ISPT Modern Slavery Risk Assessment Matrix to include new high-risk areas
- Continued supplier training and engagement with a specific focus on cleaning and security services
- Reviewed and updated our tender assessment
- Continued a deep dive collaboration with partners in the construction industry and commenced a deep dive in the security industry
- Continued our collaboration with the Cleaning Accountability Framework on the development of a Portfolio Rating Framework
- Strengthened our remediation approach by including human rights violations, including modern slavery, within our SHIELD online reporting platform, and
- Engaged in the Australian Government's review of the Modern Slavery Act through the Property Council of Australia

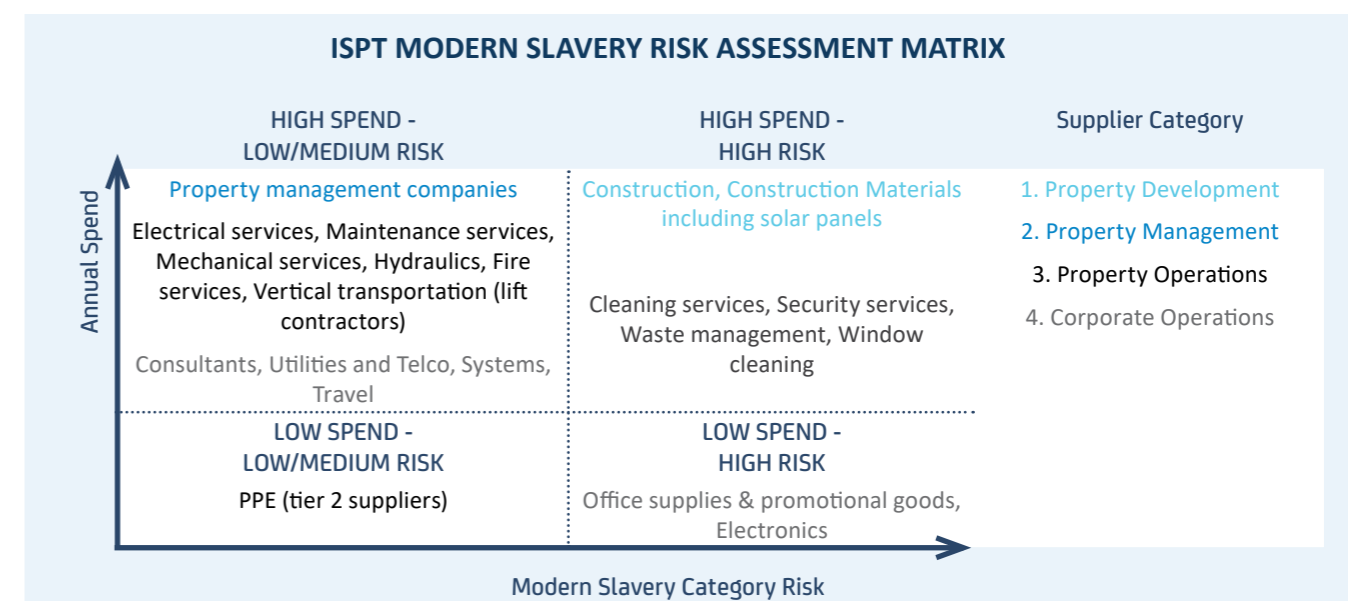


National Circuit, Canberra

01 ASSESS: IDENTIFYING MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

The ISPT Modern Slavery Risk Assessment Matrix (Matrix) maps our suppliers according to inherent modern slavery risks based on the sector they operate in and the country from which products are sourced.

While spend does not impact the risk rating of a procurement category (i.e. whether it is considered low, high or medium risk), we use it currently to prioritise our risk mitigation actions through our Matrix. We understand that our risk profile will evolve and change over time, and the Matrix is therefore reviewed regularly by the Modern Slavery Working Group to reflect any changes in our economic and operational environment using information from external sources including, the Global Slavery Index, the Business and Human Rights Resource Centre and the Property Council of Australia. In FY2023, we reviewed the Matrix to include new high-risk areas including window cleaning.



5 Horsburgh Drive, PortLink, Altona

RISK ASSESSMENT

We understand that modern slavery involves the serious exploitation of people for personal or commercial gain. We assess our operations and supply chains to understand the risk of modern slavery occurring in Australia or overseas.

Our assessment of modern slavery risks is based on internationally recognised resources such as the [Global Slavery Index](#) and the [Business and Human Rights Resource Centre](#) to identify high risk countries, regions, industries, and categories. We also adopted a modern slavery risk analysis conducted by Edge Environment for the Property Council of Australia Supplier Engagement Platform (PCA Platform), which shows inherent risks present in key procurement categories and countries. We then map this information against our operations and supply chains to identify any elevated risks of modern slavery.

We also work to understand how we could be involved in our identified modern slavery risks using the ‘continuum of involvement’ outlined in the UN Guiding Principles on Business and Human Rights.

The UN Guiding Principles on Business and Human Rights’ continuum of involvement provides a framework for companies to understand how they could be involved in human rights harms including modern slavery through their own operations and business relationships and expected appropriate action in response to any such involvement. For example:

- A business may *cause* modern slavery if its own actions or omissions directly result in modern slavery occurring. For example, if a business requires migrant workers to repay recruitment, travel and visa fees plus interest prior to being paid a salary.
- A business may *contribute* to modern slavery if its actions or omissions facilitate or incentivise modern slavery occurring to the extent that the modern slavery would have been unlikely to occur without these actions or omissions. For example, if a business placed unrealistic timeframes and cost requirements on a supplier, which could only be met by the supplier if it uses exploitative practices.
- A businesses’ operations, products or services may be *directly linked* to modern slavery through its business relationships, such as a supplier. For example, a business’ supplier could procure materials from a sub-supplier produced using forced labour which are then used by the supplier in manufacturing goods for the business.

Our assessment of where modern risks may exist in our business indicates that the greatest risk of modern slavery practices is through our supply chains. This is due to the supply chain complexity within the sectors we procure from and our suppliers in some sectors use of sub-contracting, labour hire providers and workers who may be more vulnerable including base-skilled, low-wage labour or migrant workers (see ‘Our Modern Slavery Risks’ below for additional information, page 21). As such, we assess ISPT is most likely to be directly linked to modern slavery through our supply chains.

We consider ISPT’s risk of causing or contributing to modern slavery both in our operations and supply chains is low due to the policies, processes and controls we have in place (including those outlined in this Statement). However, if our controls fail, we acknowledge that we could potentially move from being directly linked to contributing to modern slavery in some circumstances. For example, if we failed to respond to credible evidence of modern slavery occurring in a direct supplier’s operations.

WORKFORCE

ISPT’s workforce predominantly comprises professionals and managers performing corporate and investment management functions across the business, mostly directly employed on individual contracts. We also engage independent and temporary contractors for white-collar work through employment agencies at times for specific corporate projects and short-term business needs.

While we recognise there can be modern slavery risks connected to recruitment agencies and temporary workers, an external evaluation conducted in FY2020 has assessed the risk of modern slavery within our workforce as low due to the professional nature of our workforce and location wholly in Australia. There have been no significant changes to the profile of our workforce since this assessment was conducted.

All ISPT staff employees are employed in Australia, complying with Australian labour laws. Remuneration levels are reviewed annually with market remuneration rates provided by an independent external consultant, in accordance with the ISPT Remuneration Policy. We seek to embed ISPT’s values in all aspects of our business and create a workplace culture that empowers employees to perform their best from their diverse capabilities and community relationships.

At all times, our employees are encouraged to use the support and resources available through our Employee Assistance Program provided by Assure for any work or personal concerns.

SUPPLY CHAINS

Risk management

Our risk management process remains unchanged from FY2022. Our priority is to focus on our areas of greatest modern slavery risk, noting we consider our exposure to modern slavery risks to be higher in our supply chains than our operations. We have approached this by systematically building our understanding of various supplier categories and related risk factors.

The PCA Platform enables us to assess suppliers through a common database and continues to be our key resource for analysis and risk identification. We use the ISPT Modern Slavery Risk Assessment Matrix (see page 17) when selecting suppliers for assessment. Suppliers are mapped according to their category of product/service and assigned a risk level. Suppliers with higher-risk profiles or who account for more than \$250,000 of our annual spend must complete the questionnaire through the PCA Platform.

As a priority, risk controls are developed for higher-risk supplier categories. Controls may include the use of tailored contract clauses, supplier audits and/or targeted training and engagement. For more information on the controls we have in place see pages 22-23.

Performance monitoring

Suppliers assessed on the PCA Platform are required to provide information on their modern slavery statements, policies, structures, and risk management within their own supply chains. We analyse the responses to identify actual and potential gaps, such as outdated and missing information and then request additional information from suppliers if there are specific gaps. A reassessment on suppliers is conducted annually. In FY2023, we included window cleaning suppliers in higher-risk categories and extended the assessment via the PCA Platform to suppliers in medium-risk categories.

PROPERTY COUNCIL OF AUSTRALIA PLATFORM ASSESSMENT

Since FY2019, we have assessed 145 suppliers via the Property Council of Australia (PCA) Platform.

The PCA Platform aims to consolidate disclosures on human rights including modern slavery risks for an entire industry. At present, 131 suppliers are covered through the platform as 14 suppliers have been removed due to inactivity. The suppliers within the PCA platform account for 60% of the total FY2023 procurement spend.

FY2023	
Additional suppliers included for assessment	22
• High Risk suppliers	7
• Medium & Low Risk suppliers	15
Suppliers included in reassessment	123
Since FY2019	
Total suppliers assessed	145
Suppliers removed from assessment	14
Current suppliers under assessment	131

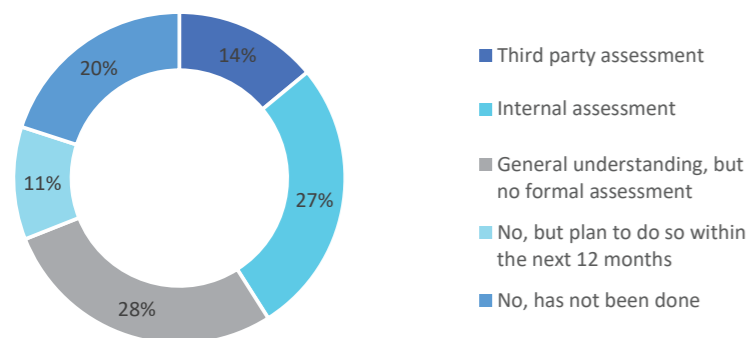
KEY INSIGHTS FROM FY2023 ASSESSMENT

The additional 22 suppliers assessed during FY2023 were selected based on their risk categories, including high-risk (cleaning and construction) and medium and low-risk (audit, consultants, repairs and management). The suppliers were invited to answer approximately 90 questions via the PCA Platform. Our interest was on suppliers' knowledge about modern slavery risks, and the steps they have taken to manage those risks.

The following questions in particular shed light on our suppliers' preparedness. Importantly, the responses enable us to assess the effectiveness of our supplier engagement program by comparing ISPT's supplier responses with responses from the previous year and against overall PCA supplier averages. The text below explains information reported by suppliers using the PCA Platform.

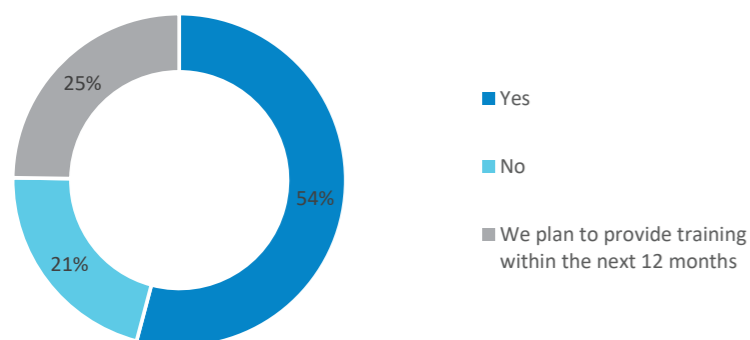
SUPPLIERS WERE ASKED:

Have you assessed the risks relating to modern slavery in your operations and supply chains?



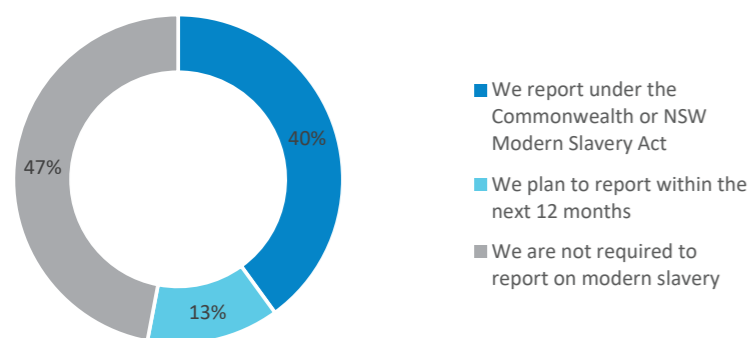
We saw a slight decrease in the number of suppliers reportedly conducting third-party assessments to assess their risks than last year (14% down from 16% in FY2022). There was, however, a higher level of internal assessment being conducted (27% up from 23% in FY2022). There was also a decrease in the number of suppliers reporting that they have not completed any risk assessment (30% down from 37%). We will continue to include modern slavery prevention initiatives on the meeting agenda with relevant high-risk suppliers and roll out briefing sessions to deepen suppliers' understanding of modern slavery risks.

Do you provide training to employees or suppliers around the topic of human rights and modern slavery?



54% of ISPT's suppliers reported they provide some form of modern slavery training to their employees or suppliers. This is an increase from 46% in FY2022. Of those that do not provide modern slavery training, 25% report they plan to do so in the coming 12 months leaving 21% of suppliers with no reported training in place or plans to provide training over the coming year. ISPT seeks to address this gap, where we can, by focusing on supplier engagement and capacity building. We have a program in place to educate suppliers on modern slavery risks and signs through contractor briefing webinars and encourage suppliers to utilise the free training resources available through the PCA Platform.

Are you a reporting entity under either the Commonwealth Modern Slavery legislation or that of another jurisdiction?



ISPT's suppliers vary in size, and many of the suppliers assessed do not meet the \$100M threshold to submit a statement to the Commonwealth government. To assist us in understanding the modern slavery risk approaches of our suppliers we ask our suppliers to affirm their status as reporting entity under the Modern Slavery Act and verify whether they have provided a Modern Slavery Statement through checking the Australian Modern Slavery Register.

OUR MODERN SLAVERY RISKS

Operational environment

Unlike some other sectors, property development and management involve significant outsourcing which can present challenges to understanding and managing supplier risks. Many of our suppliers may use multiple levels of contractors, particularly for construction. When assessing our modern slavery risks, we give consideration to a range of factors including the geographical location in which goods were sourced, the service, product or materials that is being sourced, supplier business models (e.g. extensive use of labour hire companies and the type of work and any potential vulnerability for workers such as migrant workers). We are increasingly requesting relevant suppliers to disclose information about their supply chains, such as the source country for products used, and their labour hire practices. The following image provides an overview of some of the key sector-wide modern slavery risks for the property sector.

Geopolitical and economic disruptors

Key disruptors in FY2023, such as inflationary pressures, COVID-19 recovery, climate-change impacts, ongoing impact of the conflict in Ukraine and labour shortages, may impact our supply chain and therefore our modern slavery risk profile. These events may interrupt demand-supply balances and increase financial pressures in certain sectors, potentially impacting work conditions and compensation of workers. Domestic labour shortages may also create a demand for labour hire companies to source overseas labour. Supply shortages may also drive suppliers to seek alternative imports, increasing our exposure to risk countries.



Sector-wide modern slavery risks for the property sector

PROCUREMENT CATEGORIES WE CONSIDER MOST AT RISK OF MODERN SLAVERY

The following table outlines our high-risk procurement categories for modern slavery and associated risk factors. These risks were identified through our Modern Slavery Risk Assessment Matrix (see page 17). We have established a range of controls to prevent and mitigate these risks. A high-level overview is provided in the table with additional information provided in the following section.

PROCUREMENT CATEGORIES	POTENTIAL MODERN SLAVERY RISK FACTORS	OVERVIEW OF CONTROLS
Cleaning services including window cleaning	<ul style="list-style-type: none"> Reported reliance on subcontracting and labour hire providers. Apparent limited visibility of workers, with work in some cases said to be conducted in remote environments or outside of standard business hours. Reported to involve base-skilled and low-wage labour with a higher representation of vulnerable workers that may be more susceptible to deceptive recruitment practices and exploitation (i.e. migrant workers). 	<ul style="list-style-type: none"> ISPT has direct contracts with the cleaning companies which include modern slavery clauses. As an active member of the Cleaning Accountability Framework, we work to positively influence these companies' labour practices through engagement and capacity building.
Security services	<ul style="list-style-type: none"> Reported reliance on subcontracting and labour hire providers. Apparent limited visibility of workers, with work in some cases said to be conducted in remote environments or outside of standard business hours. Reported to involve base-skilled and low-wage labour with a higher representation of vulnerable workers that may be more susceptible to deceptive recruitment practices and exploitation (i.e. migrant workers). 	<ul style="list-style-type: none"> ISPT has direct contracts with security companies which include modern slavery clauses. We also work to positively influence policies and practices through supplier engagement and capacity building.
Waste management services	<ul style="list-style-type: none"> Reported reliance on subcontracting and labour hire providers. Apparent limited visibility of workers, with work in some cases said to be conducted in remote environments or outside of standard business hours. Reported to involve base-skilled and low-wage labour with a higher representation of vulnerable workers that may be more susceptible to deceptive recruitment practices and exploitation (i.e. migrant workers). 	<ul style="list-style-type: none"> ISPT has direct contracts with waste companies which include modern slavery clauses. We conduct quarterly meetings to monitor their performance and discuss any issues of concern.
Construction services and materials	<ul style="list-style-type: none"> Reported reliance on subcontracting and labour hire providers. Construction companies source a broad variety of materials from companies in Australia and overseas for use in our projects. Procured goods can involve complex and opaque supply chains. Raw material extraction and manufacturing often takes place overseas in countries reported to be higher risk. 	<ul style="list-style-type: none"> All construction materials are required to be procured in accordance with the ISPT Procurement Policy and Guidelines. ISPT has modern slavery contract clauses in place with construction companies. These clauses require our head contractors to have processes in place to identify modern slavery risks in procurement, including such risks in relation to prefabricated parts or structures and construction materials, and to take steps to manage those risks.
Solar panels	<ul style="list-style-type: none"> Sourcing of polysilicon and other materials contained within solar panels can involve complex global supply chains which can limit scope to verify the origin of products. Raw material extraction and manufacturing is reported to take place overseas in higher risk countries. Installation may involve subcontracted lower skilled labour. 	<ul style="list-style-type: none"> Solar panel suppliers are categorised in the High Risk-Medium Spend within our risk matrix and will continue to be managed with elevated priority. In FY2023, we assessed all local solar suppliers, with a requirement for them to provide assessment information on their manufacturers including information on efforts in identifying, preventing and addressing all forms of modern slavery, including availability of a supplier code of conduct and any evidence through site visits or audits. We recognise the challenges in conducting supply chain traceability in relation to solar panels and also reporting by third parties including by civil society, journalists and academics about the extent of modern slavery risks in this sector. Responding to the risks associated with solar panels will be an area of ongoing focus and dialogue, and we will engage over the coming year with our suppliers and the PCA on this issue.
Other goods manufactured in high-risk countries	<ul style="list-style-type: none"> We source other materials such as electronic products and office stationery that have complex and opaque supply chains. They often comprise components that are sourced and manufactured in higher risk countries and/or developed through low cost production models. 	<ul style="list-style-type: none"> Where possible we include modern slavery clauses in our contracts. Where we have less leverage to influence a supplier, for example if our spend is a smaller component of their revenue, we look to make informed procurement decisions based on publicly available information.



Spring Place, Victoria

02 CONTROL: ADDRESSING OUR MODERN SLAVERY RISKS

TENDER EVALUATION

ISPT's standard tender evaluation templates incorporate an assessment of prospective suppliers' commitments to ethical work practices, particularly those related to the environment, health and safety, community, work conditions, and fair payment, including modern slavery.

During the reporting period, we strengthened our tender process by increasing our requirements for high-risk suppliers and deepening our supply engagement.

- Using our recurring supplier induction program to raise awareness on modern slavery and reporting channels in conjunction with our health and safety protocols for workers

These activities have helped us to increase our level of engagement with cleaners, security guards and waste management providers working for contracted companies providing those services across all ISPT development sites.

SUPPLIER COMMUNICATION AND TRAINING

As a leading property business in Australia, we recognise that we have an important role in setting expectations across our value chain and building the capacity of suppliers. During FY2023, we continued to reach out to our suppliers and contractors through established channels such as regular meetings. At relevant engagement opportunities and contractual negotiations, we communicate our expectations of suppliers to take steps to address modern slavery risks, as outlined through the [ISPT Supplier Code of Conduct](#).

Every time ISPT conducts a large tender process, we deliver a webinar which includes an overview of ISPT's values and expectations and includes specific information on modern slavery. This includes information on what modern slavery is, how to identify it and reporting channels. ISPT conducted a one-hour webinar with six cleaning services contractors and property management companies in November 2022. A follow-up webinar was conducted with the property management companies, the Cleaning Accountability Framework and the United Workers Union to discuss in further detail the rights of workers within the cleaning sector.

TENDERER'S DECLARATION

The ISPT tender response schedule requires tenderers to declare their actions to manage human rights risks, including modern slavery preventive measures, and provide their modern slavery statements, if applicable.

The submissions are assessed and designated a weighted score by our Sustainability and Procurement teams, and these influence selection outcomes.

REVIEW OF TENDER ASSESSMENT

A review of the tender questions was conducted in FY2023. The review assessed the types of questions that needed to be asked of high-risk and low-risk suppliers, how to appropriately weight the responses and the type of guidance needed for the assessor. Following this review, the tender questions were revised for suppliers in high-risk categories and assessor guidance was developed. As a result, all suppliers in high-risk categories (construction, cleaning including window cleaning, security and waste management) are now required to complete a modern slavery questionnaire through the PCA/Informed365 platform as part of the tender process. The completed questionnaires are then reviewed to identify any potential red flags. The updated tender assessment process enables us to identify actual or potential risks and make informed decisions, prior to a contract being awarded.

CONTINUED ENGAGEMENT AND OUTREACH

Similar to FY2022, we have continued our efforts to raise awareness of modern slavery with suppliers and their workers at our properties in collaboration with our property partners through:

- Including modern slavery risk management as an ongoing agenda item for relevant supplier meetings
- Displaying modern slavery posters in facilities designated for the workers of suppliers with information on the Whistle-blower Hotline (page 37)
- Distributing ISPT Whistle-blower Policy User Guide to suppliers and their workers through our property partners
- Implementing on-site sign-in systems for suppliers visiting our properties to acknowledge they have read and understood the ISPT Whistle-blower Policy User Guide, and



Posters on modern slavery in ISPT facilities

CONSTRUCTION DEEP DIVE PROJECT – GLASS REINFORCED CONCRETE PANELS

ISPT partnered with a construction contractor in FY2022 to undertake a deep dive into the supply chains of glass reinforced concrete panels. This work continued throughout FY2023.

A traceability study was conducted in FY2022 which identified three companies that supply raw materials to a manufacturing supplier. Desk-based research identified a range of risk factors related to the location of the suppliers and the raw materials being sourced. Following this analysis, during FY2023 an independent audit was conducted on one of the raw material suppliers to monitor the supplier’s working conditions and develop insights into whether their practices and operations are aligned with international labour and broader human rights standards. The SMETA audit was conducted by an international independent audit provider. The auditors conducted a two-day site visit and interviewed both management and workers (individual and in focus groups).

The audit identified some areas of non-conformance related to labour rights which could also have implications for modern slavery risk management. These included:

- A lack of formal policies related to labour rights, and
- No formal mechanism for workers and management to communicate (i.e. through a trade union or worker committee).

Other issues identified through the audit process related to health and safety, for example:

- Safety issues related to fire exits being blocked and not appropriately marked and a lack of training on equipment, and
- Health and hygiene issues related to unclean bathroom facilities.

Following the audit, a Corrective Action Plan was established. A follow-up audit was conducted and to date only two issues remain outstanding relating to the security of a switch box and management of a bathroom. A member of the supplier’s management team has been appointed to resolve the outstanding issues. The follow-up audit was conducted in July 2023, which is outside of ISPT’s reporting period for this statement. We will provide a further update on the follow-up audit in our FY2024 Statement.

The deep dive highlighted the complexity of the glass reinforced concrete panel supply chain and emphasised the need for industry collaboration to build capacity throughout the supply chain. During FY2024, ISPT’s Modern Slavery Working Group will discuss the audit findings and explore opportunities to utilise the approach taken and examine other construction materials.

SECURITY DEEP DIVE PROJECT

ISPT has partnered with a security contractor to undertake a deep dive into the provision of security services. The purpose of the deep dive is to get a better understanding of the human rights risks including modern slavery and challenges within the security services sector and explore opportunities to strengthen engagement and collaboration.

As part of this engagement, ISPT conducted a site visit with the security contractor to get a better understanding of its risk management approach. During the site visit, we discussed the contractor’s policies and how these are communicated to sub-contractors, training materials, sub-contracting practices, licensing validation, incident and injury reporting and the availability of grievance mechanisms. Sectoral challenges were also discussed including the labour shortages in the sector and the risk that may create for modern slavery practices.

Strong relationships with suppliers are invaluable when addressing modern slavery risks as they can help foster open communication, trust and collaboration. The site visit played a significant role in strengthening our relationship with this security contractor.

During FY2024 we will continue to engage with security contractors to develop a deeper understanding of the sectoral risks and challenges and identify opportunities to work collaboratively to address these risks.

INDUSTRY ENGAGEMENT

ISPT is committed to promoting good labour practices through our industry presence and leadership. Collaboration is key to driving meaningful change and is at the heart of our modern slavery response.

CLEANING ACCOUNTABILITY FRAMEWORK CERTIFICATION

ISPT is one of the founding members of the Cleaning Accountability Framework (CAF) which was established in 2013 as an independent not-for-profit entity to end exploitation in the cleaning industry. CAF is represented by stakeholders across the cleaning supply chain, including industry peers which are also our co-ownership partners and suppliers. ISPT was deeply involved in CAF’s evolution years before the Modern Slavery Act was introduced.

CAF’s 3 Star Standard site certification scheme was introduced in April 2019, with ISPT as a participant of the pilot scheme. A CAF-certified building provides assurance that cleaning services at the premises are being procured, managed, and delivered in a manner that shows respect for cleaners’ labour rights, including the avoidance of modern slavery.

ISPT aims to achieve CAF certification for our entire property portfolio, as part of our 2025 ESG Strategy’s Flag on the Hill Targets. To date, 12 of our properties are certified under CAF. In FY2023, we received new CAF certifications for 2 precincts and 1 property.

CAF certification has not only transformed the cleaning industry but has also become the national benchmark for industry best practices. It has also received recognition within the Green Star – Performance rating tool, which assesses the operational performance of existing buildings.

CAF CONTRACTOR PREQUALIFICATION

ISPT is committed to responsible business practices and to promoting responsible employment practices among our suppliers. Specifically in the cleaning industry, we require our contractors to apply for and obtain a CAF Contractor Prequalification as part of our standard tender processes.

CAF Contractor Prequalification – an assessment of the systems, policies, and processes of a cleaning contractor against the CAF 3 Star Standard, and a test of their implementation with their workforce, enables contractors to demonstrate their compliance against key criteria, such as fair labour practices, safe working conditions and freedom of association across their business.

Portfolio Rating Framework

In FY2023, ISPT continued its collaboration with CAF to develop the Portfolio Rating Framework. The Framework will enable an entire property portfolio to be assessed and rated together, scaling up the current CAF certification on individual properties.

This new framework leads to a more efficient process both in terms of time and cost and broad-ranging positive outcomes for cleaners and other supply chain stakeholders.

A portfolio working group has been established within CAF to steer the process. ISPT chairs this working group.

Key areas of focus for the Portfolio rating pilot will be:

- CAF compliant tender and contracting processes at a portfolio level
- Expansion of digital worker engagement capabilities
- Digital platform to analyse compliance data
- Training modules for procurers and providers of cleaning services on mitigating risk of exploitation including modern slavery
- Educational resources for cleaners, translated into community languages, and
- Grievance mechanism that includes anonymous reporting, investigation and remediation

FLAG ON THE HILL TARGETS TO 2025

- 100%** POWERED BY RENEWABLE ENERGY (FOR ELECTRICAL SOURCES)
- GENERATE MORE** CARBON OFFSETS THAN WE USE
- GENERATE ZERO** ORGANIC WASTE FROM OUR PROPERTIES GOING TO LANDFILL
- HAVE ACHIEVED 30%** REDUCTION IN WATER USAGE
- INVEST UP TO \$10M** OVER 5 YEARS OR THE EQUIVALENT OF 2 BASIS POINTS, INTO SOCIAL IMPACT INITIATIVES
- HAVE 100% CAF** CERTIFICATION ACROSS OUR ENTIRE PORTFOLIO OF PROPERTIES
- EMBED** INDIGENOUS RECONCILIATION, INCLUSION AND DIVERSITY PRINCIPLES INTO ALL BUSINESS PROCESSES AND OPERATIONS

COLLABORATION IN ACTION: PILOTING A TENDER PROCESS TO SUPPORT THE CAF PORTFOLIO RATING

ISPT appointed CBRE, one of our commercial property management partners, to run a national tender for cleaning services. This tender process was a collaboration between ISPT, CBRE, and CAF with engagement from the United Workers Union. The tender process was a pilot to utilise the procurement processes and associated pricing templates that make up a key component of the CAF Portfolio Rating framework.

The tender process started with a webinar for all participating cleaning companies. ISPT, CBRE and CAF all presented at the webinar. The webinar provided an opportunity to educate cleaning companies on modern slavery risks, the role of CAF and ISPT's ESG Strategy including our goal of 100% CAF certification across our portfolio by 2025.

The tender was successfully completed utilising the CAF pricing templates. This ensured that the process was aligned to industry benchmarks and there was transparency and accountability of contract pricing. Ultimately, all successful cleaning contractors were CAF prequalified or committed to being so within the agreement timeframe. This helps to give us confidence that these contractors are prepared to put in place the necessary policies and processes to manage the potential modern slavery risks associated with the cleaning sector.

THE VALUE OF WORKER VOICE

Besides a dynamic structure of compliance checks on cleaning companies by various industry stakeholders, CAF works to address modern slavery risks from the outset through outreach and engagement with workers.

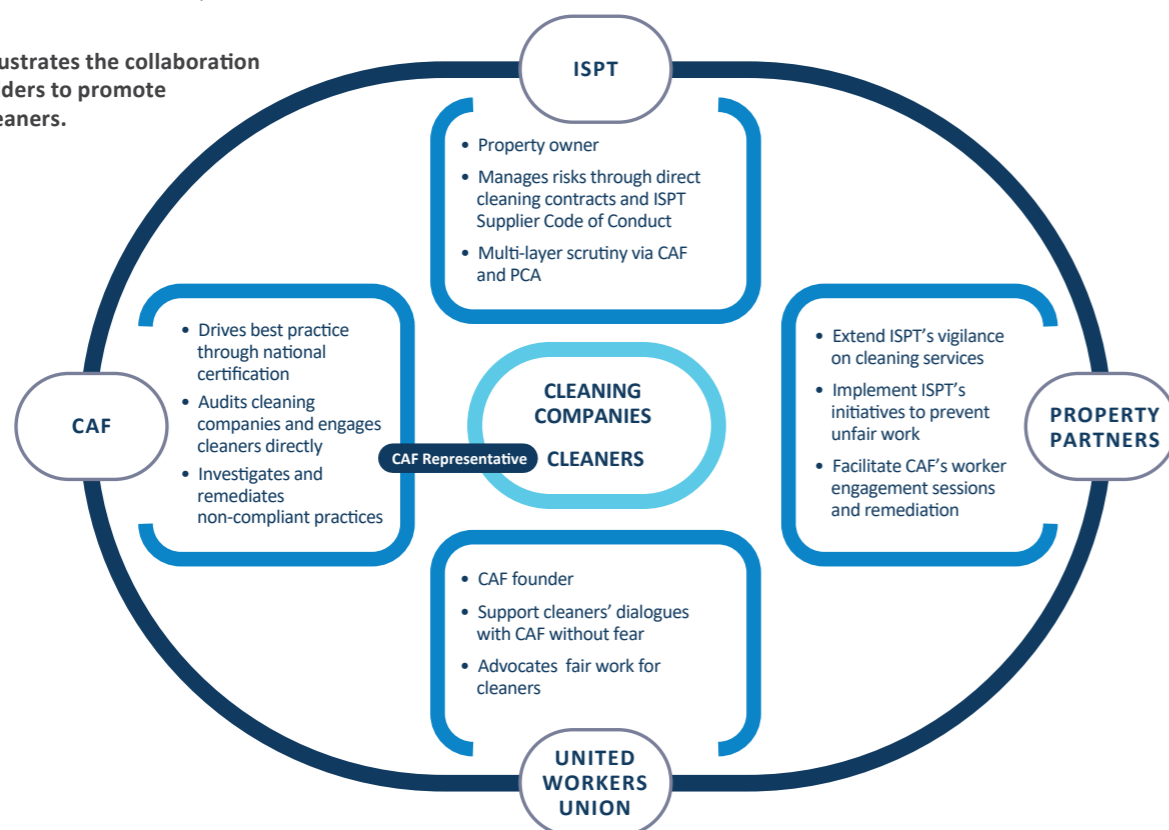
Worker engagement through the CAF certification process is a key part of its ongoing compliance assessment. It aims to give weight to cleaners' feedback and acts as a reverse performance evaluation complementing CAF's desk-based audits on cleaning companies.

Taking measures to create a safe and comfortable environment, CAF brings cleaners together to facilitate collective conversations on labour issues. This process is supported by officials from United Workers Union, often former cleaners, to bridge language or knowledge barriers.

At every CAF-certified property, a trained CAF representative is appointed amongst cleaners to champion their role in shaping a fair work environment.

This process helps ISPT to utilise an early-warning system whereby potential issues are identified before they escalate. Engaging with workers through CAF is not only an important risk management tool but can assist in driving innovative solutions to creating more respectful and sustainable business practices.

This diagram illustrates the collaboration of CAF stakeholders to promote fair work for cleaners.



PROPERTY COUNCIL OF AUSTRALIA

ISPT is an active and long-standing member of the Property Council of Australia (PCA), the leading advocate for Australia's property sector with members that include many of our industry peers and investors. During FY2023, ISPT has supported and engaged with many of its initiatives to promote leading practices for the property industry.

INITIATIVES

PCA Modern Slavery Working Group

In 2018, we became one of the 15 founding members of the PCA's Modern Slavery Working Group. The Group's goal is to champion a collective approach to overcoming the complexities and challenges in understanding modern slavery risks.

One example of this is the Group's collaboration in investigating modern slavery risks related to solar panels. During FY2023, the PCA Modern Slavery Working Group continued to focus on potential risks of forced labour relating to sourcing of solar panels including allegations relating to reports of state-sponsored forced labour. As outlined on page 22, this will remain an ongoing priority issue for ISPT, and we look forward to collaborating with industry peers to develop an industry wide understanding and approach.

PCA Platform

The PCA Platform was developed by PCA, Informed 365, and industry experts in 2019. The PCA Platform aims to consolidate disclosures on human rights including modern slavery risks for an entire industry.

Suppliers and customers of the industry's supply chains are assessed for modern slavery risks through a questionnaire that:

- Supports PCA members to proactively engage suppliers on common grounds and streamline reporting
- Assists in reducing reporting burden and facilitates suppliers to share information with different property organisations, and
- Encourages greater transparency and provides a model for other industry approaches

For further information on the PCA Platform, see page 19.

ENGAGEMENT WITH THE AUSTRALIAN GOVERNMENT'S REVIEW OF THE MODERN SLAVERY ACT

ISPT collaborated with industry peers through the Property Council of Australia and provided input into an [industry submission](#) to the Australian Government's review of the Modern Slavery Act. The submission outlined that the PCA believes that overall, the Modern Slavery Act has had a positive impact in the first three years within the business community particularly in relation to increased transparency and supplier knowledge and maturity.

We acknowledge the recommendations that were made in Professor John McMillan's report containing his findings from the independent review that was released in May 2023 and look forward to working with our stakeholders in the next phase of the Modern Slavery Act.

SPOTLIGHT ON GRIEVANCE MECHANISMS

In FY2022, the PCA Modern Slavery Working Group commissioned KPMG to develop a study on effective human rights grievance mechanisms. This [work](#) was launched in December 2022 on the International Day for the Abolition of Slavery. ISPT's Human Rights Policy was featured as an example of a company's code of conduct that includes information related to grievance mechanisms and remediation.



03 INTEGRATE: EMBEDDING OUR MODERN SLAVERY RESPONSE ACROSS OUR BUSINESS

GOVERNANCE FRAMEWORK

We remain focused on integrating respect for human rights in our business operations, practices and policies, as outlined in the UN Guiding Principles on Business and Human Rights. Accountability for respecting human rights, including modern slavery prevention, is cross-functional. Led by the Modern Slavery Working Group, our business units work together to help embed risk mitigation strategies and initiatives across the business.

ISPT is committed to excellence in corporate governance, compliance, and ethical behaviour. Our corporate governance framework is designed to protect and enhance investor value by ensuring we operate transparently.

ISPT BOARD

The ISPT Board has overall responsibility for the effective governance of our business and ensuring appropriate risk management and mitigation processes are in place. The ISPT Board oversees our broader human rights program (which includes modern slavery; see the reporting structure diagram on page 31 for additional information). As we are owned by our investors, ISPT Pty Ltd's Constitution provides that 7 of our 10 directors on the Board are either appointed or elected by our member investors. We also have 3 independent directors, including the Chair.

ISPT BOARD MODERN SLAVERY WORKING GROUP

In 2019, we established an internal Modern Slavery Working Group comprising representatives from across our business. This gives us a broad and multi-functional perspective to understand and assess the risks of modern slavery and continuously evolve our strategy to address them. Prior to this reporting period, we have also previously sought specialist advice from one of Australia's leading business and human rights advisory firms, Pillar Two, in relation to specific aspects of our response.

Since establishment in FY2019, the Working Group has been instrumental in increasing awareness, understanding and visibility of modern slavery risks and driving a coordinated response, within our business and supply chains. It has also supported us to engage with the property sector more broadly through the Property Council of Australia and the Cleaning Accountability Framework.



Annex, Central Plaza, 345 Queen Street, Brisbane

GOVERNANCE STRUCTURE



CORPORATE POLICIES

We have a suite of policies that outline our commitments and expectations of ISPT directors, employees and independent contractors, our suppliers and our other business partners in relation to modern slavery.

The following section outlines how our key policies are relevant to our modern slavery approach and how they are communicated and implemented.

POLICY AND RELEVANCE TO MODERN SLAVERY	COMMUNICATION AND IMPLEMENTATION
<p>ISPT Code of Conduct reflects our core values and culture, with emphasis on honesty, integrity, trust, and commitment to maintain a safe working environment.</p>	<p>The Code of Conduct applies to all directors, employees and independent contractors and is enforced through investigation of breaches by ISPT, which can result in a range of disciplinary actions.</p> <p>All new starters are required to read and acknowledge the ISPT policies available on the ISPT intranet and all employees are required to complete an online learning module on the ISPT Code of Conduct.</p>
<p>ISPT Human Rights Policy expresses our commitment to respect internationally recognised human rights as set out in the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, in line with the UNGPs. The policy articulates our zero-tolerance approach to forced labour, child labour, or any other forms of modern slavery as defined in the Modern Slavery Act.</p>	<p>We communicate this Policy to directors, employees, independent contractors, business partners and joint venture partners.</p> <p>The policy encourages the reporting of human rights concerns by employees, independent contractors and other stakeholders including suppliers and their workers. These concerns can be raised through community complaints mechanisms operated by ISPT and its Policy.</p>
<p>ISPT Whistle-blower Policy sets out a process for reporting concerns about illegal, corrupt or unethical conduct (including modern slavery) occurring in our business. It highlights our commitment to nurture a culture of openness and accountability to minimise associated risks, and to address it appropriately. The policy was introduced in FY2020 and updated in FY2022 with increased clarity on the scope and operation of the reporting process.</p>	<p>The Stopline Whistle-blower Hotline is dedicated to handling reports on suspected misconduct, including modern slavery. Anyone working on ISPT's behalf, and any external person engaged to perform work related to ISPT (including our suppliers' workers), can report concerns about suspected illegal or unethical conduct, including modern slavery, with confidentiality and anonymity through the hotline.</p> <p>The Whistle-Blower Policy User Guidance outlines the support system in place for whistle-blowers. Information on the Policy and User Guide is provided to all ISPT staff during mandatory training. The User Guide is provided to our property partners for distribution to visiting contractors.</p> <p>All employees are required to complete an online learning module on the Whistleblower Policy.</p>

POLICY AND RELEVANCE TO MODERN SLAVERY	COMMUNICATION AND IMPLEMENTATION
<p>ISPT Supplier Code of Conduct outlines our expectations of suppliers in the management of ESG risks – particularly across governance and ethics, human rights (including modern slavery), health, safety, and environment (HSE), community, diversity, and data privacy. Our suppliers are expected to comply with the Modern Slavery Act (where relevant), and all other applicable laws relating to modern slavery, respect workers' rights, and ensure fair remuneration and working conditions.</p>	<p>The ISPT Supplier Code of Conduct is presented during the tender process to suppliers for acknowledgement before their engagement, with requirements to comply with the Code of Conduct incorporated into services and consultancy contracts. Supplier compliance with the Code of Conduct may be assessed through ongoing dialogue and engagement, self-assessment questionnaires and audits. Suppliers are also required to disclose breaches of the Supplier Code of Conduct to ISPT, including allegations from third parties.</p> <p>Potential breaches are investigated by ISPT and may result in a range of actions. The action will depend on the severity of the breach. Where possible, we establish corrective action plans to support suppliers to develop capabilities and improve performance. ISPT may terminate a relationship with a supplier if it violates the Supplier Code of Conduct and refuses to implement improvement plans.</p>
<p>ISPT Responsible Investment Policy (shared with investors only) outlines the principles for the integration of ESG criteria, which includes modern slavery, into our investment decisions. It is consistent with our fiduciary obligations to our investors and defines the minimum requirements for ESG management. This policy sets the framework of how ISPT operates, in alignment with the Principles for Responsible Investment.</p>	<p>Regular reporting is provided to investors across a range of ESG metrics related to our investments. As a signatory to the Principles for Responsible Investment we also publicly report on our efforts and activities to embed the Principles for Responsible Investment. In addition, we hold ourselves accountable to our investors through our participation in the Global Real Estate Sustainability Benchmark (GRESB), which measures the way we incorporate ESG principles into our investment process.</p>
<p>ISPT Procurement Policy (internal) sets our selection criteria for suppliers, which includes sustainable procurement principles from the ISPT Sustainable Procurement Guidelines. Within the section on sustainable procurement, the policy specifically outlines ISPT's position and expectation in relation to human rights including modern slavery. This helps ensure we work with suppliers who share our beliefs in responsible supply chain management and who are able to demonstrate their ability to deliver sustainable outcomes through fair and ethical practices.</p>	<p>The ISPT Sustainable Procurement Guidelines underpin our approach to sustainable procurement and provide an internal guide to employees on how to implement ISPT's Procurement Policy as it relates to sustainable procurement. The Guidelines embrace best practice guidance principles for considering environmental and social themes (including modern slavery) in procurement upheld by internationally recognised standards to:</p> <ul style="list-style-type: none"> • Support the welfare, health and safety of our suppliers' labour forces and their extended supply chains • Educate and empower supply chain labour forces in continuous improvement and innovation • Promote diversity and inclusion in supply chains to ensure everyone has a 'fair go' with employment opportunities and staff engagement, and • Uphold human rights in the workplace and supply chains, including ensuring workers' entitlements regarding remuneration, benefits and workplace conditions are compliant with relevant laws

2. Principles for Responsible Investment are a set of principles that provide a framework for incorporating environmental, social, and governance factors into investment practices. Available at: <https://www.unpri.org/about-us/what-are-the-principles-for-responsible-investment>.

3. ISO 20400:2017 Sustainable procurement – Guidance.

ISPT TEAM TRAINING

We have an established training program in place, with an ongoing commitment to continuous improvement and enhancing our understanding and knowledge of modern slavery and how to prevent and address any involvement ISPT could have in it.

Training on modern slavery including remediation and reporting channels is part of ISPT’s mandatory compliance training program for all employees. As of 14 July 2023, 97% of ISPT employees have completed the Modern Slavery training. The remaining 3% comprising new starters have been allocated a timeframe to complete the training.

Our Board, Board Committee, senior employees, Working Group and teams directly involved in supply chain management are trained specifically according to their dedicated responsibilities.

TRAINING	ISPT TEAM MEMBERS
<p>Specialised Modern slavery and reporting channels. Following the update of our SHIELD reporting platform to include ‘Workplace Human Rights Violation’ as a reporting field, we conducted training on modern slavery, the risk factors, what it looks like and how to report via SHIELD.</p>	Property management health and safety representatives
<p>Modern Slavery Awareness training</p>	ISPT Board ARCC
<p>Conferences Australian Government’s National Modern Slavery Conference 2023</p>	Sustainability and procurement specialist
<p>Online Compliance module – Awareness Whistleblower Modern slavery</p>	All ISPT employees All ISPT employees

GRIEVANCES AND REMEDIATION

In line with the UNGPs and ISPT Human Rights Policy, we recognise our responsibility to provide for or cooperate in the remediation of human rights harm, such as modern slavery, which we identify we have caused or contributed to.

Our framework for grievance resolutions outlined below provides guidance on the avenues for making reports relating to human rights (including modern slavery), ethics, employment welfare, other misconduct, and health and safety.

Our ongoing commitments:

- We will continue to develop our response processes and escalation pathways for modern slavery incidents alongside the development of our supplier management framework, particularly as live issues arise.
- We will encourage suppliers to provide and maintain their own grievance mechanism for their workers and suppliers to safely raise concerns and complaints without fear of retaliation as outlined in the ISPT Supplier Code of Conduct.

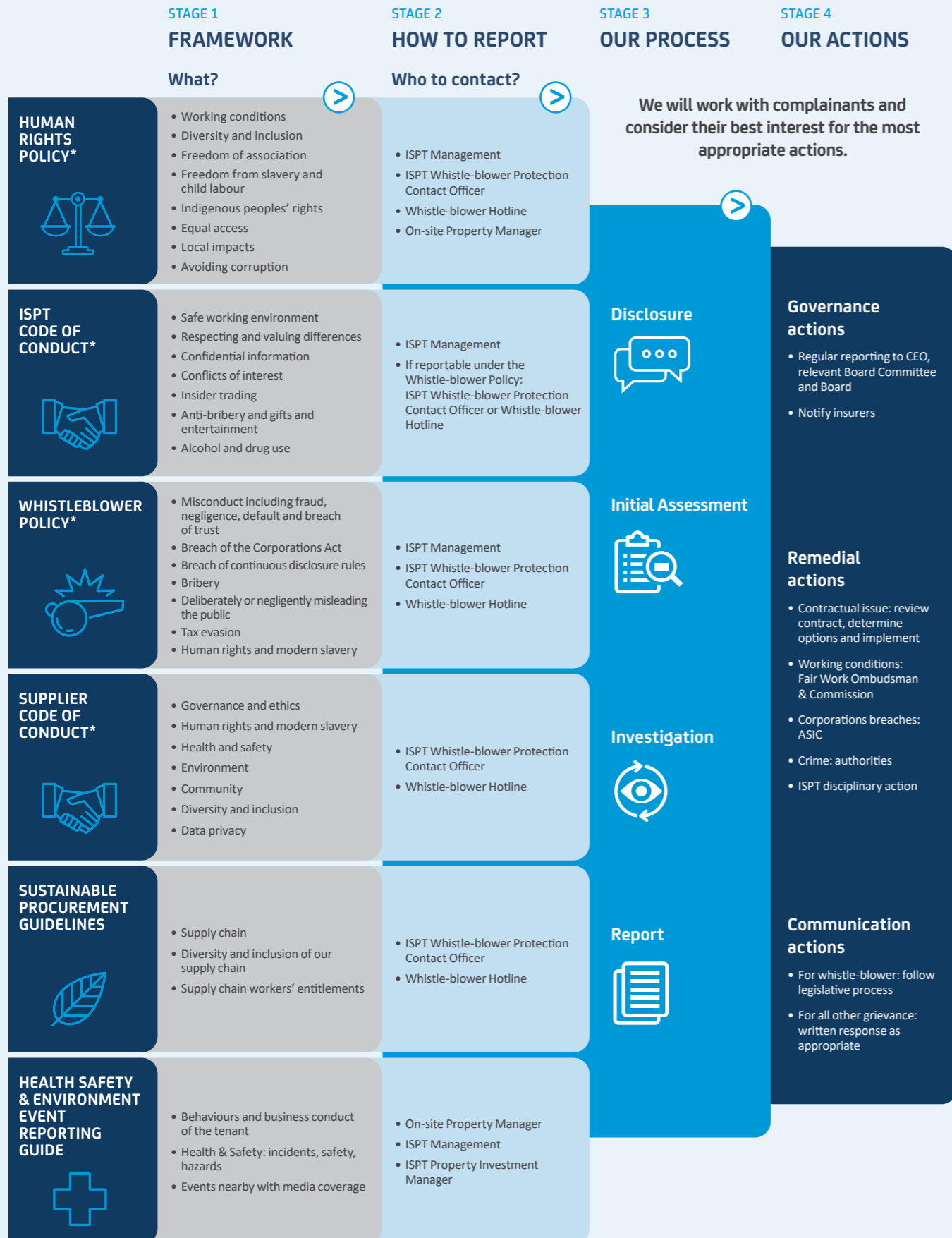


Central Plaza, 345 Queen Street, Brisbane



81 Horbsurgh Drive, Altona

FRAMEWORK FOR GRIEVANCE RESOLUTION



*Available on ISPT website

GRIEVANCE MECHANISMS

We aim to provide grievance mechanisms that are trusted and accessible (in line with the UN Guiding Principles on Business and Human Rights effectiveness criteria). Our framework for grievance resolution above outlines how grievances, including matters relating to modern slavery and other human rights harms, can be reported and the steps that will be taken to resolve them.

WHISTLE-BLOWER MECHANISM

Whistle-blower Hotline

The Whistle-blower Hotline is dedicated to handling reports on suspected misconduct, including modern slavery. It is provided by Stoplevel, an independent third-party based in Australia established in 2001. Anyone working on our behalf, and any external person engaged to perform work related to ISPT (including our suppliers' workers), can report concerns about suspected illegal or unethical conduct, including modern slavery, with confidentiality and anonymity through the hotline.

ISPT Whistle-blower Policy User Guide

The ISPT Whistle-blower Policy User Guide promotes understanding of the support system in place for whistle-blowers and is part of our efforts to ensure its grievance mechanisms are trusted and accessible.

The User Guide outlines key information in the ISPT Whistle-blower Policy in clear, simple language:

- Behaviours that constitute a misconduct under the ISPT Whistle-blower Policy
- Persons who can report, the process of making a confidential report and the investigation process, and
- Support provided by ISPT and protection available under Australia's Whistle-blower Protection Laws

CAF Grievance Mechanism

As part of CAF 3 Star certification framework, cleaners at our properties are checked on regularly by CAF through on-site engagement. These meetings provide cleaners with a safe environment to raise issues relating to health, treatment, and any other areas of concern, which could include potential concerns relating to modern slavery.

SHIELD ONLINE REPORTING PLATFORM

SHIELD is an ISPT online portal for staff and property partners to report events related to health and safety, including incidents, near misses, hazards, and authority interactions.

In FY2023, the SHIELD online reporting tool was updated to include 'Workplace Human Rights Violation' as a reporting field. This enhancement will enable us to curate reports on modern slavery concerns streamlining our ability to process, review and report on suspected cases. Since the introduction of the new reporting field, the procurement and health and safety teams have conducted an education session with the property management health and safety representatives to educate them on modern slavery, the risk factors, what it looks like and how to report via SHIELD. To date, there have been no reports made under the new reporting field. The priority for FY2024, will be on continuing to build awareness of the new reporting field within SHIELD and understanding and identifying potential barriers to reporting.

CUSTOMERS

If a customer or tenant has a complaint, our property partners are usually their first point of contact. The property managers will then notify the ISPT property investment or property operations team of the complaint as part of our reporting process.

If the complaint is a modern slavery related issue, the property investment or property operations team must immediately refer the complaint to the ISPT Chief Legal, Risk and Safety Officer.

CASES

Any concerning issues raised through any of the above mentioned channels will be reported to ISPT according to our framework for grievance resolution.

To date, we have not received any disclosure or complaints related to modern slavery via our reporting channels. However, we acknowledge that the absence of complaints does not necessarily mean that there is an absence of harm. To develop a better understanding of our grievance mechanisms, we will conduct a review of our grievance channels in FY2024. We will review the effectiveness of our grievance mechanisms to ensure that they meet the effectiveness criteria as outlined in the UN Guiding Principles on Business and Human Rights.

04 REVIEW: ASSESSING OUR EFFECTIVENESS

We are continually refining our modern slavery risk management, including taking steps to assess the effectiveness of our actions.

MODERN SLAVERY RISK REVIEW

The Modern Slavery Risk Review is our ongoing risk assessment process to evaluate both existing and emerging modern slavery risks. The Modern Slavery Risk Review process supports us in assessing the effectiveness of our actions to manage modern slavery risks by providing a cross-functional mechanism to test whether our current response is fit for purpose and having an impact. Regular periodic reviews are conducted by the Risk and Compliance team throughout the year. Risk assessments are currently undertaken with key internal business unit stakeholders directly involved in procurement and outsourcing.

As part of our continuous improvement process, we work to explore ways to leverage our review process to strengthen our evidence base for key risk areas and become more effective in identifying emerging trends. In addition, through the review process we are exploring opportunities to increase our effectiveness by leveraging technology-based tools.

IMPLEMENTING OUR MODERN SLAVERY ROADMAP

Our modern slavery roadmap also supports us to track our effectiveness. Our roadmap was informed by a review of our modern slavery response by an expert business and human rights advisory firm and sets out key actions we have identified we should focus on to enhance the effectiveness of our response. Tracking our progress against our three-year workplan helps us monitor where areas of our response are progressing well or may require further attention or resources.

CONSIDERING EXTERNAL FEEDBACK

We also draw on external feedback to help us understand the effectiveness of our response. For example, engagement in collaborative groups such as the PCA Modern Slavery Working Group helps us to understand from learnings shared with our peers where there may be opportunities to enhance our response to help ensure our modern slavery risk management approach remains targeted and fit for purpose.

DEVELOPING A FRAMEWORK TO ASSESS THE EFFECTIVENESS OF OUR MODERN SLAVERY RESPONSE

Assessing the effectiveness of our actions to assess and address our modern slavery risks is key to helping us understand the impact of our actions and driving continuous improvement.

In addition to our ongoing Modern Slavery Risk Review process, during FY2023, ISPT has focused on developing a framework to assist in reporting, monitoring and assessing the effectiveness of our actions. This framework is being developed in a cross-functional manner drawing on internal stakeholder feedback and the expertise of the Modern Slavery Working Group. The framework includes a number of metrics and will be finalised in FY2024. Metrics are being established based on our supplier assessments and engagement; our worker engagement; our training and capacity building, partnerships and the number of complaints we receive. Through this process, we are exploring and defining what effectiveness means to our business and will report on the outcomes of that process in our FY2024 statement.







Importantly, the process to develop this framework has created the space to have discussions internally around the impact of our actions and creating awareness around the value of measuring and tracking effectiveness.



Facade of National Circuit, Canberra

THE YEAR AHEAD

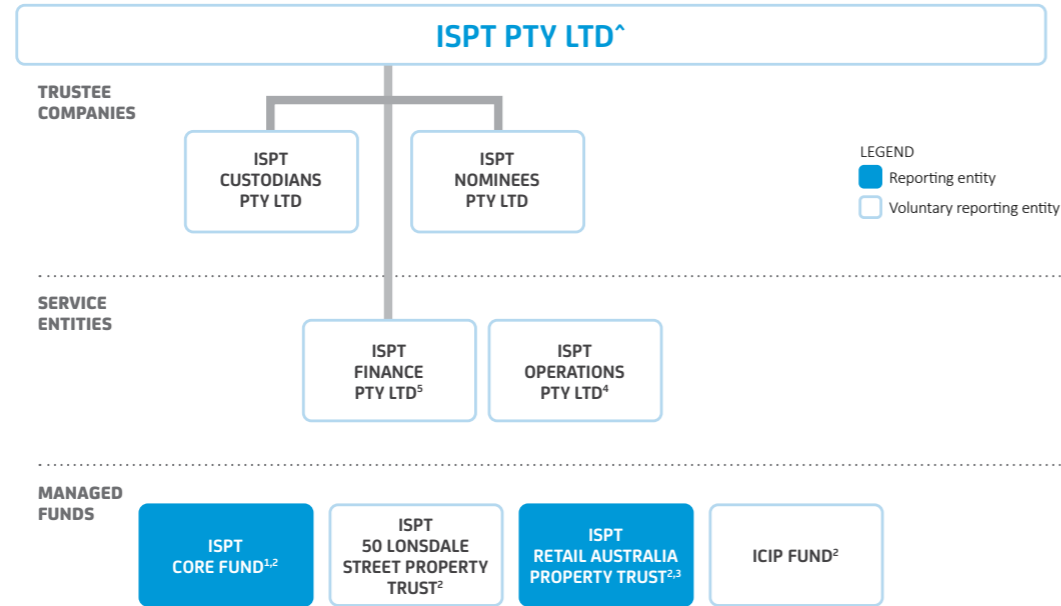
In FY2023 we commenced a new three-year workplan, which was developed with support from an external business and human rights advisory firm, Pillar Two. The new workplan builds on our foundational work and provides a roadmap for us to refine our approach, strengthen engagement with key stakeholders and expand our influence to keep modern slavery risks high on our agenda.

FY2023	STATUS	FY2024	FY2025
Risk Assessment Matrix Revise the ISPT Modern Slavery Risk Assessment Matrix to include new high-risk areas and distinguish between risks relating to labour and materials.		Industry influence Consider opportunities to build on current PCA membership by joining a multi-sectoral, multi-stakeholder forum.	Working Group Review the membership of our Working Group to ensure it remains fit for purpose.
Supplier education Continue to expand training support for small suppliers such as the webinars on ISPT's Supplier Code of Conduct, modern slavery signs and reporting channels.	 Ongoing	Supplier audit Consider scope to conduct additional audits focused on ethical labour rights of a supplier or asking high-risk suppliers to share existing audit reports.	Research partnerships Seek partnerships with a university or other expert body to support research on modern slavery risks in a key area of the supply chain, such as solar panels or other high-risk building materials.
Tender assessment Review current tender questions to consider different questions for high-risk and low-risk suppliers, weighting of responses and assessor guidance.		Customer collaborations Explore collaboration opportunities with tenant customers, including training, establishing a tenant working group and potentially developing a tenant tool kit to build capacity to manage modern slavery risks.	Modern slavery survivor support Explore opportunities to provide employment pathways for modern slavery survivors in Australia.
Deep-dive collaborations Undertake modern slavery deep dives with 2 or more selected suppliers (such as construction partners).	 Ongoing	SHIELD Evaluate SHIELD against the UN Guiding Principles on Business and Human Rights' criteria for effective non-judicial grievance mechanisms.	Feedback channel Seek feedback from trusted NGOs or other external stakeholders such as workers' representatives on ISPT's modern slavery reporting, and potentially also our underlying modern slavery risk management.
Modern Slavery Act review Explore opportunities to engage with the Australian Government's review of the Modern Slavery Act.		Supplier partnerships Seek partnerships with key suppliers or tenant customers to deliver a scenario-based training exercise.	
Review metrics Develop metrics to assess effectiveness, including stakeholder feedback.	 Ongoing	Worker evaluation Explore options to pilot worker voice feedback tools for a high-risk service provider such as security or construction.	

ANNEXURE A – OUR CORPORATE STRUCTURE

^ ISPT Pty Ltd is a Trustee Company.

1. Industry Superannuation Property Trust No. 1 and Industry Superannuation Property Trust No. 2 are stapled to form the ISPT Core Fund.
2. Trustee is ISPT Pty Ltd.
3. ISPT Retail Australia Property Trust No.1 and ISPT Retail Australia Property Trust No.2 are stapled to form the ISPT Retail Australia Property Trust (IRAPT).
4. All shares in ISPT Operations Pty Ltd are held by ISPT as trustee of the ISPT Operations Trust. All units in the ISPT Operations Trust are owned by Unitholders in ISPT Core Fund, 50 Lonsdale Street Property Trust and IRAPT.
5. ISPT Finance's sole purpose is to secure debt funding from third party lenders and onlend it to the ISPT Core Fund on equivalent terms and on a cost-recovery basis.



As at 30 June 2023



Liberty Place, Sydney

