

Modern Slavery Statement FY2022

Accord Property Holdings Pty Ltd



Background to Modern Slavery

In 2018 the Australian Government passed the Modern Slavery Act 2018 ('the Act') which requires large corporations in Australia with turnover in excess of \$100 million, to annually report on the risks of modern slavery in their operations and supply chain, and actions taken to address those risks.

The Act defines modern slavery as including eight types of serious exploitation:

- trafficking in persons;
- slavery;
- servitude;
- forced marriage;
- forced labour;
- debt bondage;
- deceptive recruiting for labour or services; and
- the worst forms of child labour which means situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

The Reporting Entity

In accordance with section 13 of the Act, this statement sets out the actions taken to assess and mitigate the risk of modern slavery by Accord Property Holdings Pty Limited, ABN 13 636 033 273 (Accord), for the period 1 July 2021 to 30 June 2022. This statement is applicable to Accord and each of its divisions, business units, affiliates, and subsidiaries.

About Accord

Accord recognises that modern slavery happens at the most extreme end of the working spectrum, and that it involves the gravest abuses of human rights and serious crimes, having severe and often lifelong consequences for its victims. We also recognise the detrimental impact of modern slavery on our industry and business. As a large scale operator within the property industry, and with our obligations outlined in the Act, we have the responsibility to recognise and respond to the risks of modern slavery in all aspects of our operations and supply chains.

This statement establishes the progress to date on identifying the risks of Modern Slavery in our operations and supply chain. To date we have:

- Reviewed our key suppliers/creditors in our supply chain to identify high risk suppliers;
- Developed a Modern Slavery Policy which outlines our expected standards from both suppliers and employees when it comes to identifying and mitigating the risks of modern slavery;
- Developed a Modern Slavery Questionnaire that can be utilised to obtain additional information from our suppliers in respect of their policies, processes and operations to ensure they are aware and are taking action to avoid modern slavery; and
- Reviewed our policies and processes to identify and mitigate risks of modern slavery as well as modifying them if necessary.

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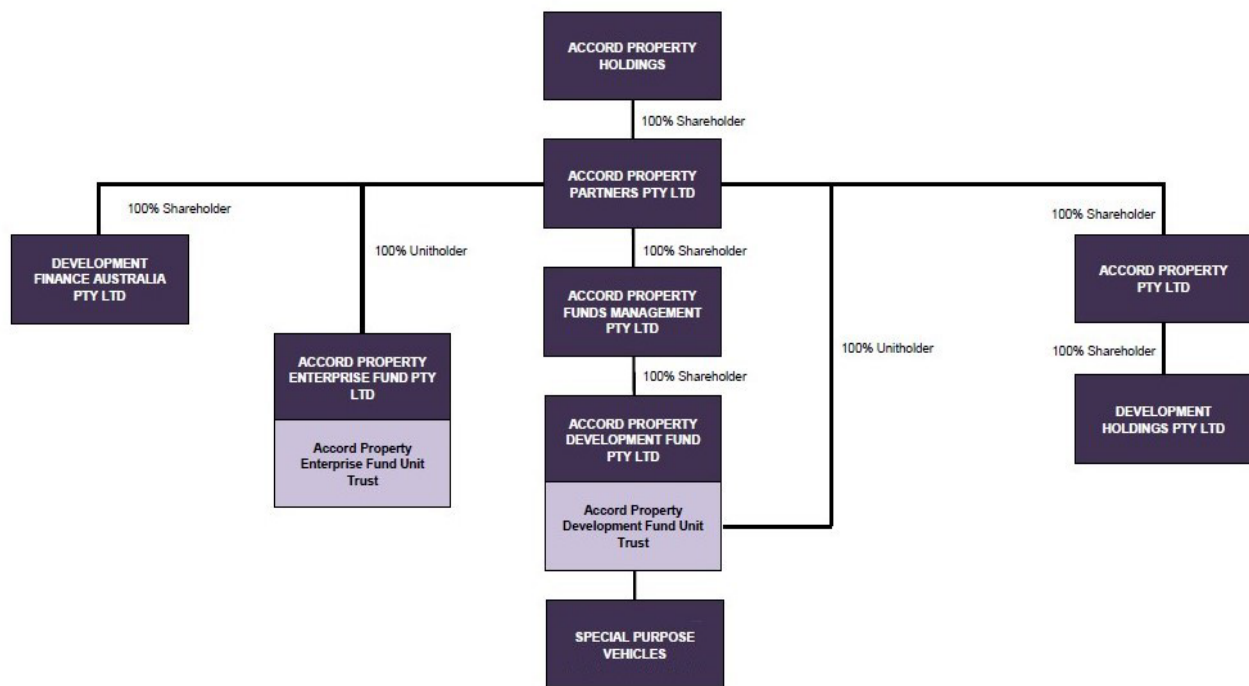


Our Structure and Operations

Accord is an Australian property development and funds management company operating nationally. Accord provides development and investment solutions across a range of sectors, including commercial, retail, child-care, healthcare and industrial. As part of our national practice, we are firmly committed to conducting business with the highest levels of integrity and ethics.

We place a great emphasis on keeping staff up-to-date with professional development requirements and safety regulations to ensure that staff maintain high levels of integrity, honesty and diligence when performing their duties. Accord has extended our accountability to ensure our business and our people are aware of the risks of modern slavery in our operations and supply chain, and actions taken by Accord to reduce those risks.

Accord Group Structure



“Special Purpose Vehicles” refers to numerous trusts that are controlled by Accord Property Development Fund Pty Ltd

Risks of Modern Slavery in our Operations and Supply Chain

Accord’s supply chain is comprised of suppliers from a range of industries including construction and engineering, diversified financial services and professional services. These suppliers consist predominately of entities that are located domestically throughout Australia.

Whilst engaging in the review of our suppliers, we have considered the Modern Slavery List of Industries and List of High Risk Countries, as provided for in The Global Slavery Index 2018. After our initial review it was determined that the majority of our top suppliers represent a low or medium risk of modern slavery. Accord’s foremost risk of modern slavery in our operations and supply chains, vests in our use of external suppliers in

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the construction and engineering industry. Many of these suppliers use subcontractors which are traditionally more at risk of modern slavery. The expectation for suppliers to maintain a high level of oversight on their use of subcontractors is covered in our Modern Slavery Policy.

We also recognise that there is a distinct risk in the use of suppliers in the construction and engineering industry that have not submitted a Modern Slavery Statement, and appear not to have modern slavery deterrent policies in place. Understanding this, suppliers are carefully vetted to ensure they align with our values and commitment to eradicating modern slavery. Our Modern Slavery Questionnaire can be utilised to directly question suppliers' policies and procedures and determine the controls they have in place to mitigate common modern slavery risks.

Furthermore, suppliers must comply with our Modern Slavery Policy which distinctly references the Modern Slavery Act 2018 and sets out our expected standards for suppliers in terms of the actions they must be taking to combat modern slavery.

Alongside our suppliers we ensure that all employees comply with the standards set out in our Modern Slavery Policy and maintain a zero-tolerance approach to any forms of modern slavery within our organisation. Accord only employs workers in Australia who are protected by stringent workplace and modern slavery legislation that seeks to minimise modern slavery risks. We continue to assess and strengthen where necessary any of our policies and processes to minimise the risk of human rights infringements anywhere in our national operations.

Actions taken by Accord to assess and address Modern Slavery Risks

This reporting period Accord focused on the creation of our Modern Slavery Policy, the development of our Modern Slavery Questionnaire and a modern slavery risk assessment. The risk assessment was done in consultation with a third-party consulting firm, and involved a throughout review of our operations and supply chain with an emphasis on identifying suppliers that present a risk of modern slavery.

In performing the risk assessment of our suppliers, we conducted a review of our top 38 suppliers making up 77% of our total spend. Accord considered risks that may potentially cause, contribute to or be directly participating in modern slavery practices, consistent with the Act and the Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities. The review included:

1. An identification of these suppliers including an independent validation of their business details;
2. Categorising suppliers into a risk matrix in accordance with the Global Slavery Index 2018 including:
 - Product and Service risk;
 - Sector and Industry risk;
 - Geographic risk;
3. Investigating the use of subcontractors;
4. Determining whether suppliers have submitted a valid modern slavery statement; and
5. Based on the above criteria, rating the supplier as either low risk, medium risk or high risk to modern slavery.

The results of our risk assessment determined that the majority of our suppliers presented a medium or low risk of modern slavery. Four of our top suppliers were found to be of high risk due to being from the construction and engineering industry, having subcontractors and not having submitted a modern slavery policy.

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Where a supplier is determined to be of a medium or high risk to modern slavery, we will engage with them in the following manner:

1. The supplier is contacted and consulted with to ensure they understand the reasons why we are required to ensure our suppliers are not at risk of modern slavery, or taking appropriate steps to reduce the risks;
2. The supplier is provided with a copy of our Modern Slavery Questionnaire which contains specific probing questions and provides for the provision of required supporting documents where applicable;
3. We engage with the supplier to collaboratively address the risk of modern slavery and establish remediation practices to mitigate the risks of modern slavery, where deemed necessary;
4. We may require suppliers to verify the source of their goods and services, provide Accord access and records, co-operate with Accord and report to Accord any actual or suspected instances of modern slavery.

Alongside our supplier risk assessment we also developed a Modern Slavery Policy which includes set standards for all suppliers that we engage with. Our Modern Slavery Policy states that suppliers should ensure they do the following:

- Demonstrate their commitment to identifying, assessing and addressing modern slavery in their operations and supply chains.
- Take actions to assess and address any modern slavery risks identified, including due diligence and remediation processes.
- Allow employees and contractors to freely lawfully resign their employment without restriction or penalty.
- Provide employees and contract workers with a pay slip that clearly shows how wages have been calculated and any details of deductions.
- Comply with legislation and any applicable industrial awards when paying staff, including overtime compensation and legally mandated benefits.
- Ensure all employee and contract workers have the right to work in the country they are undertaking work.
- Not restrict the movement of employees or contract workers at any time by withholding original identification and personal documents such as Visa's, passports etc.
- Provide all employees and contract workers with a contract of employment/contractor agreement that outlines pay rates and other entitlements.
- Not use any type of forced labour, bonded labour or indentured labour.
- Ensure they comply with the minimum legal working age in the country in question or in the absence of such law, by the International Labour Organisation (ILO) Convention 138. Suppliers must verify the age of all employees to ensure compliance.

We acknowledge that some of our larger suppliers may not have the capacity to confirm all of our standards, in this situation we will strive to ensure that such suppliers are transparent with their supply chains and processes, including having solid modern slavery policies, procedures and/or the provision of a modern slavery statement.

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Assessing the effectiveness of our Actions

We have described our actions taken in the immediate assessment of modern slavery risk within our operations and supply chain. This includes policy review and updates, drafting of new policies and a risk assessment for our high spend suppliers. In doing so Accord has mapped out key parts of our operations and supply chain in order to increase our understanding of our potential vulnerabilities to modern slavery.

All high risk, medium risk, and new suppliers will be vetted for modern slavery risks through the completion of our Modern Slavery Questionnaire, where deemed necessary. This questionnaire incorporates modern slavery requirements and the provision of supporting documents where applicable. Accord aims to use the information obtained through this process to build transparent and collaborative relationships with suppliers and to ensure that our expectations of the reporting of modern slavery risks are clearly communicated. The continual assessment of our supply chain is vital to ensure that we are meeting our obligations in regard to modern slavery.

We will continue to review our Modern Slavery Policy and ensure that Accord employees and suppliers, where applicable, certify on an annual basis that they have read and understand these policies. We will regularly review and improve our modern slavery internal controls and procedures in order to monitor their effectiveness, and respond to areas that are not effective.

The Process of Consultation with any entities Accord owns or controls

During the reporting period this statement covers, namely 1 July 2021 to 30 June 2022, we actively engaged and consulting with all entities that have an interest in Accord:

- Accord Property Partners Pty Ltd
- Accord Property Funds Management Pty Ltd
- Accord Property Development Fund Pty Ltd, and all associated Trusts
- Accord Property Enterprise Fund Pty Ltd
- Accord Property Pty Ltd
- Development Holdings Pty Ltd
- Development Finance Australia Pty Ltd

All of the above entities are regularly consulted and provided updates to ensure they are fully aware of the requirements to address modern slavery and the need to submit this statement. This involves discussing details of the Modern Slavery Act 2018's reporting requirements; information regarding the actions taken to date; information regarding future actions and the provision of relevant materials such the Modern Slavery Policy. Ensuring a high level of communication throughout the organisation ensures a consistent understanding of our values and responsibilities when it comes to modern slavery.

Next Steps

In order to build on the modern slavery framework we have established to date, we will be focusing on the following areas and the extent to which these are achievable within reason:

- Introduce modern slavery training for our employees in the next calendar year. This may entail the distribution of booklets, online courses, in-person meetings with management and/or other written resources.

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- More intensive training to employees who are directly involved in supply chain management, to understand in more detail what slavery and human trafficking entails and how to mitigate the risk of these in their respective supply chain.
- Performing social accountability audits on our suppliers, particularly those in the construction and engineering industry. These inspections will be done on-site, within reason, to evaluate their practices with respect to the treatment of their workers and identifying and determining any potential modern slavery risks.
- Require as far as reasonably practicable, a requirement for current suppliers and all new suppliers to complete the Modern Slavery Questionnaire.
- Consideration will be given to providing additional modern slavery literature to our suppliers. This may be dependent on the result obtained in the completion of our Modern Slavery Questionnaire.
- Monitor and review the effectiveness of our Modern Slavery Policy and our procedures, taking into account its suitability, adequacy and effectiveness in reducing the risks of modern slavery as our business evolves.
- Developing internal accountability standards and procedures further, to hold our employees and contractors accountable for non-compliance with our standards on modern slavery, including:
- Ensuring suppliers promptly address any potential risks of modern slavery;
 - Encouraging all suppliers to meet our standards as set out in our Modern Slavery Policy;
 - Monitoring suppliers for compliance with the standards;
 - Establishing consequences for non-compliance; and
 - Establishing a process to remediate such breaches.

Accord Property Holdings Pty Ltd Modern Slavery Statement 2022

Signed by:

Lachlan Hogarth
Director Accord Property Holdings Pty Ltd
14 September 2022

Samuel Morris
Director Accord Property Holdings Pty Ltd
14 September 2022

The Board of Accord Property Holdings Pty Ltd ABN: 13 636 033 273 has approved this Statement on 14 September 2022.