

# **Modern Slavery Statement**

**FY23** 



logosproperty.com

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## Our Commitment

At LOGOS, integrity and ethical conduct form the bedrock of our business philosophy. We are steadfast in our commitment to establishing and reinforcing systems that proactively mitigate the risks of modern slavery within our operations and supply chains.

Our corporate values, particularly 'People Matter' and 'Look Beyond Tomorrow', drive our daily decisions and actions. 'People Matter' ensures that we prioritize the safety and wellbeing of all individuals, while 'Look Beyond Tomorrow' guides our efforts to create a sustainable and prosperous future for both communities and the environment. Transparent reporting remains a cornerstone of our approach and we are committed to complying with the Modern Slavery Act 2018 (Act).

As an investment manager, LOGOS acknowledges that modern slavery is a complex global issue that demands a collaborative approach. We work closely within the broader LOGOS Group platform to develop and implement comprehensive policies and initiatives across all jurisdictions. This unified strategy aims not only to meet regulatory requirements but also to uphold our responsibility to respect human rights and ensure fair treatment throughout our operations.

This Modern Slavery Statement provides an overview of LOGOS Australia's dedicated efforts and achievements in identifying and addressing modern slavery risks. It underscores our ongoing commitment to enhancing our practices and setting new benchmarks in ethical investment management.

John March

John Marsh Managing Director & Co-CEO LOGOS

Trent Iliffe Managing Director & Co-CEO LOGOS LOGOS is a logistics property specialist that delivers cutting-edge property solutions in the Asia-Pacific region. We are driven to exceed expectations, and our tailored, end-to-end offering generates success for investors and customers alike.



### **LOGOS** Overview and Operations

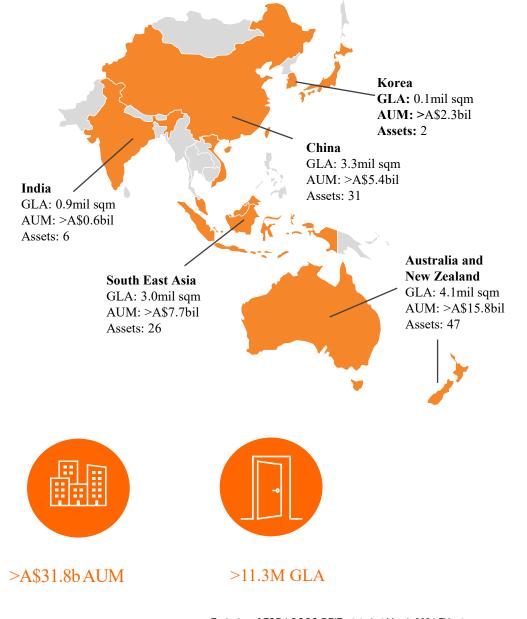
LOGOS Property Group is a vertically integrated, dynamic specialist in developing property solutions for customers in the logistics sector, We operate across 10 countries in the Asia Pacific region, managing every aspect of logistics real estate, including investment management, sourcing land or facilities and undertaking development and asset management on behalf of some of the world's leading global real estate investors.

We have highly specialised and robust teams across our investment management, development management, asset management and property management operations.

LOGOS Australia is part of the LOGOS Property Group for which this statement is prepared.

References to LOGOS throughout this Statement are references to the actions initiated by LOGOS Australia, implemented globally by LOGOS Group.

We understand that modern slavery is a global issue and requires a coordinated and collaborative global approach. The modern slavery actions, policies, and provisions initiated by LOGOS Australia are cocreated and implemented across the LOGOS international related entities to coordinate a holistic approach with the aim to create a standardised and robust approach to addressing modern slavery risks to people across all jurisdictions.



### About this Statement

This statement has been prepared for LOGOS Australia Company Pty Ltd, a large proprietary company, which is wholly owned by LOGOS New Holding Trust, a trust managed and operated by LOGOS New Holding Company Pty Ltd.

The majority of LOGOS Australia Company Pty Ltd subsidiaries are operating companies that provide various services to LOGOS managed funds. We have several entities which offer service offerings, these entities include:

- LOGOS Investment Management Pty Ltd
- LOGOS Investment Management II Pty Ltd
- LOGOS Investment Manager Pty Ltd
- LOGOS MLP Management Pty Ltd
- LOGOS Development Management Pty Ltd
- LOGOS Australia Group Pty Ltd

- LOGOS MLP Development Management Pty Ltd
- LOGOS Southport Development Management Pty Ltd
- LOGOS NZ Management Pty Ltd
- LOGOS New Zealand Development Management Pty Ltd
- LOGOS Property Management Pty Ltd

All other entities within the LOGOS Australia corporate structure outlined in Figure 1 are non-trading entities, which do not enter into employment contracts or supply contracts.

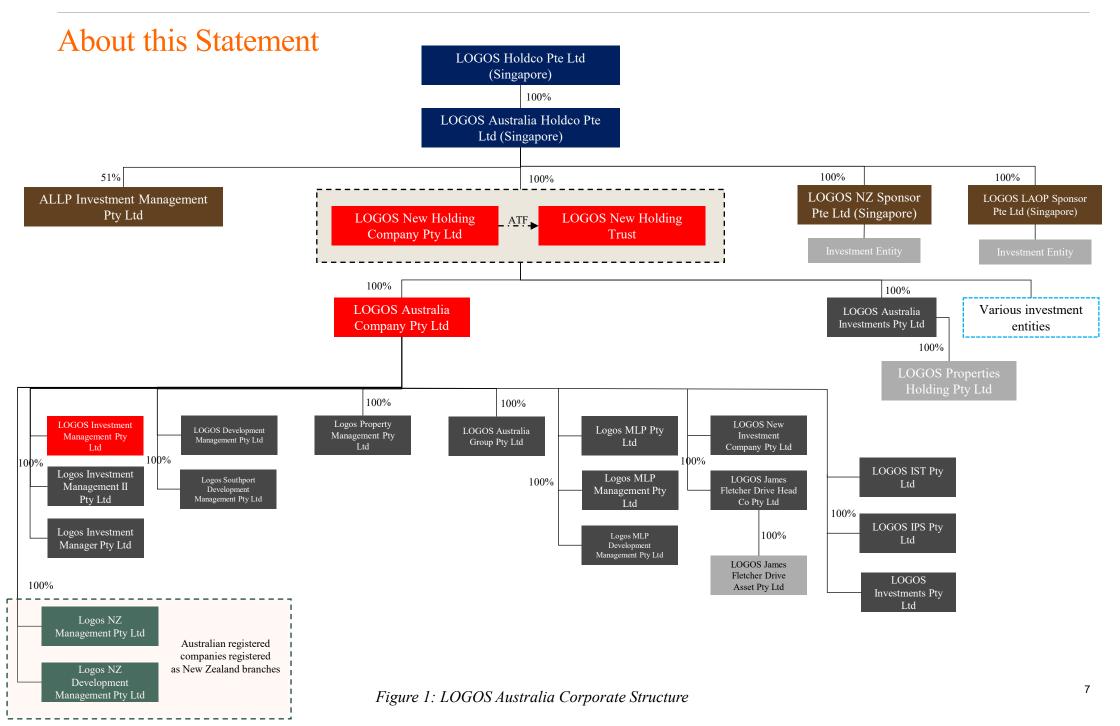
This Modern Slavery Statement for LOGOS Australia covers the reporting period 1 January 2023 to 31 December 2023 (Reporting Period). This Statement meets the mandatory criteria structure as outlined in the Guidance for Reporting Entities: Commonwealth Modern Slavery Act 2018.

#### **Consultation and Engagement**

LOGOS Australia operates as an integrated group of companies with policies, systems, and approaches applying uniformly across each business unit and entity. The executive leadership team is responsible for providing oversight, input and approval of the Group's Modern Slavery Framework and annual Australian Modern Slavery Statement.

During the 2023 reporting period, LOGOS actively engaged and consulted with all LOGOS group company representatives to provide regular and relevant materials and updates on the development and actions LOGOS intended to take to protect vulnerable workers within our supply chains, raise awareness of our staff and management of modern slavery issues, and ensure a common understanding of the LOGOS approach towards mitigating modern slavery risks.

LOGOS New Holding Company Pty Ltd has consulted with each of the operating entities identified above in the process of preparing this Statement. The directors of LOGOS New Holding Company Pty Ltd have been consulted and approved this Statement on 26 June 2024.



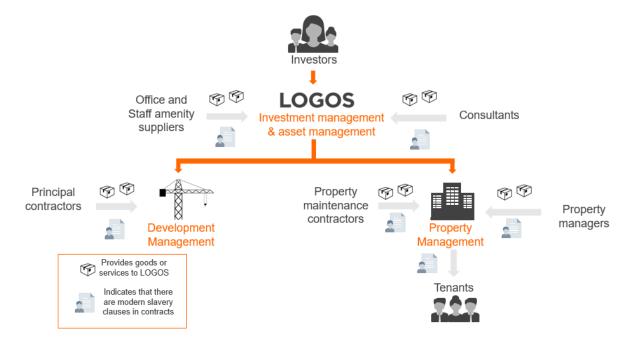
### LOGOS Supply Chain Network

LOGOS Australia engages various key procurement categories with over 100 suppliers through first tier suppliers.

Most of these first-tier suppliers are domiciled in Australia, and fall into the following procurement categories:

- Consultant and professional advisory services
- Financial and auditing services
- Information technology services
- Contract labour
- Office consumables
- Office equipment
- Fit-out materials for new offices

At LOGOS, our major service providers such as Principal Contractors and Property Manager/s, are often responsible for the appointment and management of sub-contractors to carry out the full scope of services required.



Visibility of our supply chain beyond top tier suppliers is sometimes limited, with mapping our supply chain a key priority for 2023 and beyond; having few direct suppliers with whom we have a relatively high influence poses an opportunity to implement and influence change.

### LOGOS Supply Chain Network

LOGOS Australia's development management, asset management and property management operations facilitate the engagement by the relevant asset holding trusts of the funds it manages, on the engagement of other key suppliers which fall into the following procurement categories:

- Construction firms
- Property management services
- Facilities maintenance services

Utilising the LOGOS Group Enterprise Risk Management Framework and with consideration to the risk indicators within the Commonwealth Modern Slavery Act 2018, LOGOS Australia undertook an initial risk review of its first-tier suppliers and the supply chains associated with the key operations of the business.

#### **Risk Review Outcomes**

LOGOS Australia employees predominantly fulfil administrative and professional roles and are located within Australia and New Zealand. They are provided with written contracts of employment and supported through the provisions established within the LOGOS Australia Human Resource Manual. The reports made pursuant to our Speak Up Policy during the Relevant Period did not raise modern slavery concerns in connection with LOGOS Australia's operations.

We consider the risk of modern slavery within the operations of LOGOS Australia to be low.

Our assessment of LOGOS Australia's supply chain, as part of our global risk assessment. identified the following risks:

- Investment Management & Corporate Operations: IT and telecommunications hardware, PPE, utilities, merchandise
- Development Management: labour, construction materials (pipes, HVAC, electrical, solar panels, cement, bricks, timber, carpet) and raw materials (steel, rubber)
- Asset Management: customer risk
- Property Management: security, cleaning, maintenance

### Supply Chain Risk Review

**Risk Review Process** 

Process	Activity
Scope and Context	<ul> <li>Establish understanding of LOGOS Australia's supply chain through both direct engagements and engagements which LOGOS Australia influence through its key operations</li> <li>Consult with relevant internal and external stakeholders</li> </ul>
Identify	<ul> <li>Consider suppliers who pose potential modern slavery risks with consideration to known risk types:         <ul> <li>Sector and industry</li> <li>Products and services</li> <li>Geographical</li> <li>Entity</li> <li>Known modern slavery indicators</li> </ul> </li> </ul>
Assess	• Determine extent of potential modern slavery risks with consideration to LOGOS Australia's existing policies, processes and frameworks
Mitigate	<ul> <li>With consideration to the risks assessed, evaluate the effectiveness of existing risk controls, including: <ul> <li>Pre-qualification and vendor evaluations</li> <li>Contract clauses</li> <li>Supplier Code of Conduct</li> <li>Speak up channels</li> <li>Remediation framework</li> </ul> </li> </ul>
	Identify opportunities for new or enhanced processes, further investigations.
Report	<ul> <li>Internally report on improvement commitments to the Board and externally interested parties.</li> <li>Prepare and lodge LOGOS Australia's Annual Statement in accordance with the Act.</li> </ul>
Monitor	<ul> <li>Allocate accountabilities and mechanisms to evaluate the success of the mitigants and monitor the progress on new initiatives.</li> </ul>

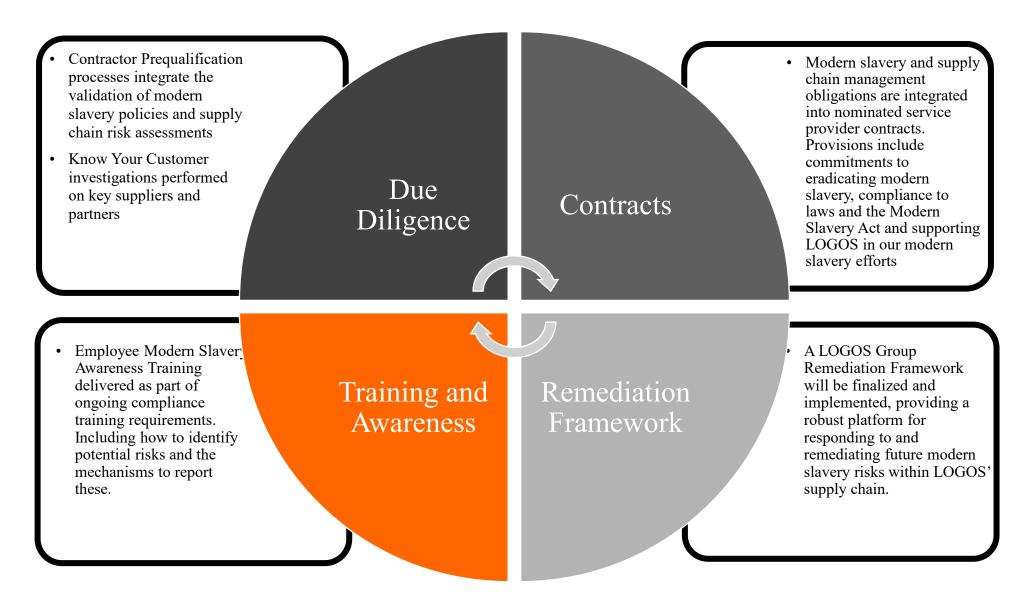
### Supply Chain Risk Mitigants

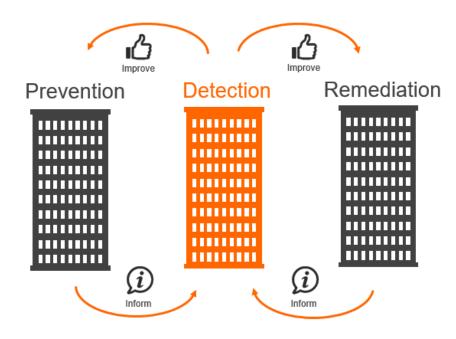
#### **Policies and Procedures:**

LOGOS Australia's policies and procedures relevant to human rights and modern slavery include:

Policy or Procedure	Intention
ESG Group Policy	Communicates LOGOS' commitment to addressing material environment, social and governance impacts from our operations and ensuring ethical leadership for organisational growth and success.
Modern Slavery Policy	Demonstrate commitment to act ethically and with integrity across business operations to prevent modern slavery risks and human trafficking in our business and related supply chains.
Health, Safety and Wellbeing Policy	Recognises the health, safety and wellbeing of our people, external stakeholders and communities in which we work is essential to the success of our business, and the commitments we are focusing on to achieve this.
Anti-bribery and Corruption Policy	LOGOS has a zero tolerance for bribery and corruption in the workplace. This policy outlines the means by which LOGOS will prevent bribery and corruption, and mechanisms people can access to report such behaviors.
Compliance Manual and Code of Business Conduct	Sets out LOGOS' expectations for all employees and the expected practices and conduct to be demonstrated whilst working for and representing LOGOS. This manual captures organisational policies relating to anti- bribery and corruption, modern slavery, speak up mechanisms, conflicts of interest, gifts and entertainment and interactions with government officials and third parties.
Speak Up Policy	Establishes a mechanism to support and encourage anyone within or outside of LOGOS to raise a concern or complaint in an anonymous manner. This mechanism can be used to raise grievances relating to modern slavery and human rights.
Enterprise Risk Management Framework	Sets the framework for consistently identifying and assessing risk across the business, as well as establishing a platform for reviewing country-wide risk profiles.
Hiring Policy	Provides a transparent framework for the recruitment and renumeration structure for employees, secondees, consultants and in-house contractors.
Supplier Code of Conduct	Establishes clear guidelines and expectations for LOGOS suppliers which align with internal LOGOS policies as outlined above, including health and safety, integrity, human rights and modern slavery, anti- bribery and corruption, supply chain management and breach reporting.

### Supply Chain Risk Mitigants





We recognise that strong governance is essential for guiding, supporting, and validating our modern slavery prevention plan. Accordingly, we have been building a governance framework based in three areas: prevention, detention, and remediation. This governance framework will reinforce our commitment and strengthen our approach to modern slavery mitigation.

#### Prevention

In order to mitigate the possibility of modern slavery from happening in our operations and supply chain LOGOS has established a comprehensive suite of policies and processes to support our modern slavery response.

Our policies clearly articulate the standards we expect from our people, our suppliers, our partners, and our tenants for preventing and addressing modern slavery and our processes clearly guide our people into how to responsible approach modern slavery.

#### **LOGOS Modern Slavery Policy**

To communicate our commitment to the elimination of modern slavery, human trafficking, and all kinds of exploitation practices we developed a new Modern Slavery Policy based on the UN Guiding Principles on Human Rights and the Modern Slavery Act 2018. The policy applies to all employees, contractors, and suppliers in Australia and overseas including the workers in our extended supply chains and those that live in the communities we operate in. The policy is publicly available in our website.

#### **Contractor Pre-Qualification checklist**

We are taking a proactive approach to identify and manage modern slavery risk in our supply chains by implementing a contractor prequalifications checklist. The pre-qualifications checklist helps the contract manager conduct a human rights screening in order to flag out any modern slavery risk.

No supplier can be onboarded by LOGOS unless the pre-qualification checklist has been complete.

Following a successful pre-qualification screening the supplier is made aware of our Supplier Code of Conduct and our Modern Slavery Policy and they must agree to the Supplier Code as part of the onboarding process.

#### **Standard Modern Slavery Clauses**

Recognising the importance of modern slavery and the necessity to have the support and collaboration of our suppliers, we have created modern slavery clauses that are included in all contracts with counterparties who are providing services to LOGOS, or a Fund managed by LOGOS (e.g., agency agreement, building contracts, supply agreements etc) as well as inclusion in standard LOGOS lease and other tenancy documents which LOGOS or a Fund managed by LOGOS enters into.

These clauses have provisions regarding:

- Commitment to eradicating modern slavery
- Compliance to local laws and the modern slavery act
- Commitment to support LOGOS in our modern slavery prevention efforts
- Commitment to create (with LOGOS support) and implement a modern slavery risk assessment
- Commitment to include modern slavery in their due diligence process

#### **Workers Accommodation Standards**

LOGOS operates in multiple countries and has numerous development projects. In some of these jurisdictions, workers stay in temporary accommodation during the construction stage which is provided by the General Contractors or Main Contractors.

We identified these on-site accommodations as a high-risk area where LOGOS may indirectly contribute to a human rights violation if suitable amenities and living conditions are not withheld. It has been identified that worker accommodation standards varied across our operational jurisdictions and was historically a project cost which was impacted during commercial negotiations.

In order to mitigate the risk and to ensure the standard of accommodation is consistent and decent for all workers regardless of location, LOGOS developed a Worker Accommodation Standards that outlines the minimum standard of safety, amenity, and comfort to be provided for workers accommodated on LOGOS development projects.

Complying with this standard is a contractual requirement for each General Contractor, Main Contractor, and associated sub-contractors. To ensure that the standard is kept, LOGOS frequently conducts unannounced audits and constantly promotes channels on site to escalate health, safety and welfare risks on site.



#### **LOGOS Speak Up Policy**

We understand the importance of having an avenue for anyone to raise concerns about abuses of human rights including occurrences of modern slavery in LOGOS' operations, LOGOS' supply chains or within LOGOS' assets.

We have developed a speak up policy that is accessible, trusted, and anonymous. Awareness of the speak up policy is integrated into annual compliance training programs for all employees, whilst details on accessing the LOGOS speak up channel is provided for all external service providers through LOGOS' Supplier Code of Conduct.

The policy applies to all of LOGOS' current and past:

- Employees, officers, and contractors
- Suppliers (including employees of suppliers)
- Directors or secretaries of a related body corporate
- These people's relatives and dependents (or their spouse's dependents)

The policy aims to:

- Encourage people to Speak Up if they become aware of Potential Misconduct
- Explain how to Speak Up and what protections a discloser will receive
- Outline LOGOS' processes for responding to Speak Up disclosures
- Promote a workplace environment in which everyone feels safe, supported, and encouraged to Speak Up

So far, the Speak up Policy has been instrumental in helping LOGOS find cases of human rights violations in our supply chain and alongside our Remediation Framework has helped LOGOS protect and remediate the victims.



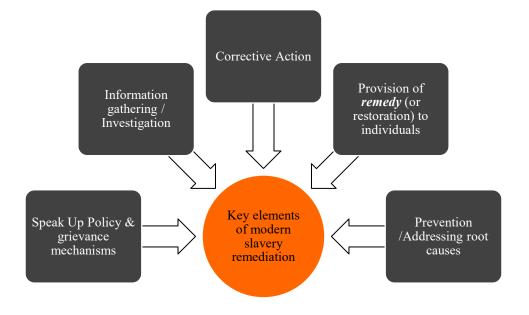
### LOGOS Remediation Framework

Remediation is the process of correcting the harm experienced by victims of modern slavery. <u>The UN Guiding Principles on Business and Human</u> <u>Rights</u> set out the recommendations for companies to prevent, address and remedy any human rights abuses committed in business operations.

LOGOS will implement the remediation framework which outlines a clear course of action should modern slavery cases be identified, or concerns raised.

The LOGOS Remediation Framework is designed to ensure LOGOS can provide, or participate in, remediation for any concerns or cases of modern slavery that might arise in its operations or supply chains. It is the blueprint for how LOGOS will respond to modern slavery.

Our remediation framework is a series of guiding principles and steps that may be adopted depending on the context and circumstances of the situation. The framework aims to suggest methods in which a modern slavery harm may be detected, reported, addressed and prevented, as well has how LOGOS can safeguard the victims of that harm. Our response to a particular circumstance will depend upon whether we caused, contributed or were directly linked to the modern slavery that has been identified.



Elements of LOGOS Modern Slavery Remediation Framework

### Effective Assessment

LOGOS measures the effectiveness of our modern slavery roadmap based on the number of cases reported and addressed by the organisation.

The following table indicates the KPI we follow:

KPI	Comment
Number of cases reported via the Grievance mechanisms	A good speak up mechanism is one that is being used, we know modern slavery is present in all supply chains. So, we expect reports of suspected cases to be made, the program needs to remain accessible and effective
	If no cases are reported, we need to evaluate the effectiveness of our Speak Up process.
Number of cases remediated	We investigate all reported cases and provide the applicable remedy in order to protect the victim
Overall understanding of modern slavery inside LOGOS	We measure the awareness of modern slavery with our people and across our industry with the aim of eliminating modern slavery

### Next Steps and Future Commitments

LOGOS is committed to ensuring modern slavery standards and practices are upheld. Our main objectives for 2024 is to create a tailored approach to risk management with the following objectives, which extends to LOGOS Australia and the wider group.

#### **FY24** Commitments

Action	Approach for FY24 and beyond
Modern Slavery Policy and Procedure Review	Undertake consistent reviews across the various policies and procedures relating to modern slavery reporting changes and initiatives to the relevant internal and external stakeholders.
Modern Slavery Training	Continue to rollout our modern slavery training program.
Grievance and Remediation Process	Continue to monitor access of our grievance hotline.
Supplier Assessments	Continue to roll out our self-assessment questionnaires and follow-up identified gaps.
Periodic updates and reporting	Ensure that as part of the quarterly reporting to ESG Committee that regular updates are provided.

### Contact

#### All enquires to be directed to

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