



VINTA MODERN SLAVERY STATEMENT

Reporting period: 1 July 2020 – 30 June 2021

Our Structure, Operations & Supply Chains

About us

This modern slavery statement (**Statement**) is made by Gregala Pty Ltd ABN 88 001 294 060, an Australian incorporated company, in accordance with the Modern Slavery Act 2018 for the reporting period 1 July 2020 to 30 June 2021. This Statement covers the operations of Gregala Pty Ltd which is a single reporting entity, and also addresses the operations of other entities in the group which it controls but which are not required to register a modern slavery statement individually (**Vinta**).

Our operations

During the reporting period, Vinta operated as a leading Australian private property and hotels group operating principally in Australia. The group has capabilities covering the full spectrum of the property lifecycle including:

- capital transactions
- developments
- design and construction
- leasing
- marketing
- asset management
- property management
- funds management

Our Australian assets include major shopping precincts at Coolangatta in Queensland and Gungahlin in the ACT.

As at the end of the reporting period Vinta operated nine hotels under the Waymark Hotels brand, predominantly in regional Queensland.

Internationally, a CBD office property in Wellington New Zealand was owned by a wholly owned New Zealand subsidiary. This property includes a mix of long-term government leases supplemented by





additional blue chip corporate tenants. This property was sold after the end of the reporting period and Vinta has no current international operations.

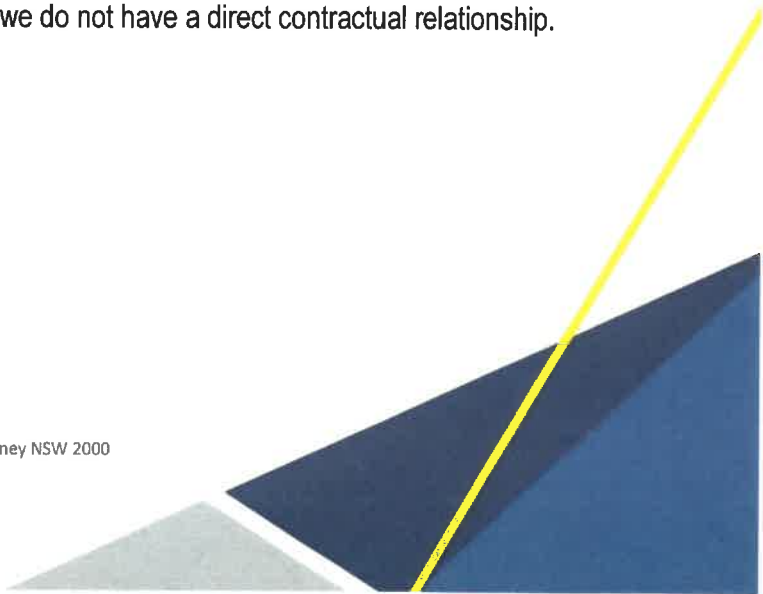
As at the end of the reporting period for this Statement, Vinta's staff consisted of over 480 employees. Employees are a mixture of permanent and casual staff.

Our supply chains

100% of Vinta's direct suppliers to our Australian operations are Australian businesses/entities, or the Australian-based operations of major multi-nationals. Vinta obtains goods and services from such suppliers in the following broad categories:

Category	Description
Corporate services	Professional advice services, IT support, catering, office and IT equipment and supplies.
Premises	Cleaning, waste management, security, facilities management, maintenance, and utilities.
Hospitality	Food and beverage supplies.
Retail	Retail products.
Design & Construction	Professional services, contracting services, building and construction equipment and supplies.

Vinta recognises that modern slavery risks may exist in our upstream supply chain involving other parties connected to our direct suppliers with which we do not have a direct contractual relationship.





Modern Slavery Risk Management

Our risk management framework

A strong risk and compliance culture has been embedded within the business. Vinta is committed to ongoing and effective risk management and compliance across all aspects of the group's operations, including finance, service delivery, operations, projects, construction, development, legal and governance, reputation and brand, human resources, and work, health, safety & environment.

Our approach to assessing and addressing the risks of modern slavery is part of our broader risk management framework and is overseen by the Group Risk Management function. Vinta has assessed the risks that it may cause, contribute, or be directly linked to modern slavery practices as outlined below.

Risks of modern slavery in our operations

A large proportion of Vinta's operations are managed in-house, including our Development, Design & Construction, Asset Management, Property Management, Hospitality and Retail.

The majority of employees in the following operations are employed in skilled professional capacities:

- corporate services
- development, design and construction
- leasing and property management
- asset management
- funds management
- shopping centre precincts

The staff in our hospitality venues are employed on terms which exceed or equal the relevant Australian hospitality industry awards. Vinta also has an employee assistance program which is independent of Vinta management and provides a further level of support to employees.

For the reporting period, and having regard to the nature of the work undertaken, services provided, Australian workplace laws, our robust hiring and people management procedures and our focus on risk and compliance, Vinta has assessed the risk of causing modern slavery in our operations as low,

Risks of modern slavery in our supply chains

The majority of the suppliers to Vinta's operations are Australian-based professional services firms, or multi-national entities with staff based in Australia. Professional services are also provided by New Zealand based suppliers to our New Zealand operations (now discontinued). For the reporting period, Vinta has assessed the risk of contributing to modern slavery in this context as low, having regard to





the categories of supplier, the nature of the services/goods supplied and Australian and New Zealand workplace laws.

Vinta has identified that some of our supply chains may be more vulnerable to modern slavery risks including building and construction supplies and equipment, cleaning, security, waste management, IT equipment and sourcing of retail products. Again, the majority of our suppliers for these goods and services are Australian-based and have been allocated a low risk rating having regard to the nature of the goods and services supplied and Australian workplace laws.

It is acknowledged that the geographical location of some upstream parties involved in our supply chain may in some cases involve higher modern slavery risks. Our assessments of suppliers disclosed that some suppliers source materials and products from third parties incorporated and/or operating outside Australia and New Zealand. These more complex supply chains were assessed as having a higher risk of being connected to modern slavery factors, including:

- Unknown labour conditions in the country of origin.
- Upstream supplier operations which are not transparent to Vinta and may not achieve the standards we expect from our Australian and New Zealand suppliers.

Assessing and addressing risk

Due diligence

As reported in the 2019/2020 Statement, through our risk governance process, executive management determined that the assessment of modern slavery risks in Vinta's operations and supply chains was required.

A due diligence process was undertaken in the first reporting period including:

- Engagement with senior management to analyse Vinta's business operations and supply chains, including for subsidiaries.
- A consultation process undertaken by the Group Risk Management function.
- Categorisation of suppliers.
- Risk assessment of Vinta's operations and supply chains having regard to the following modern slavery factors: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

During the current reporting period, Vinta operations in Australia and New Zealand were impacted by COVID – 19 pandemic public health orders and directions. Compliance with these directions, and our priority focus on the health and safety of staff and customers, affected operations in our shopping





precincts, offices, and some of our hotels. However, our supply chains for essential goods and services were assessed as remaining relatively stable.

During the current reporting period, key aspects of our modern slavery risk management program included:

- Ensuring that modern slavery risks remain front of mind by their inclusion in regular risk reviews with senior management.
- Continuing to deal with direct suppliers who have been evaluated as low risk and those who conscientiously review and address issues in their own systems concerning the risks of modern slavery, thereby verifying our secondary and upstream supplies.
- Provision of support for senior management involved in procurement to assist them to assess and report on any identified risks of modern slavery in the procurement of goods and services.

Remediation

During the current reporting period, no specific cases of actual or suspected modern slavery associated with our operations or supply chains were reported.

Vinta has a comprehensive Whistleblower Policy to support its commitment to ethical business operations.

Effectiveness of the Program

Our due diligence process has allowed us to identify the risks of modern slavery in our operations and supply chains. Our ongoing governance processes will include further steps to monitor the integrity of our assessments. The program continues to emphasise the importance of modern slavery risks for senior management, particularly in procuring goods and services, and will assist to identify areas where further review and assessment may be needed.

Consultation

Vinta has continued the consultation process with each of its Divisions (including those operated by subsidiaries). This process involves communication and support to the senior management team to effectively meet our commitments. The Group Risk Management function will continue to support and review the scope of supplier categories and engage in direct risk analysis consultation with each Division.





Approval

This Statement was approved by the Board of Gregala Pty Ltd ABN 88 001 294 060 on 21 December 2021.

A handwritten signature in black ink, appearing to read "Christopher J. Wilson", written over a horizontal line.

Signature of Director

CHRISTOPHER J. WILSON

Name of Director (print)

21 DECEMBER 2021

Date

