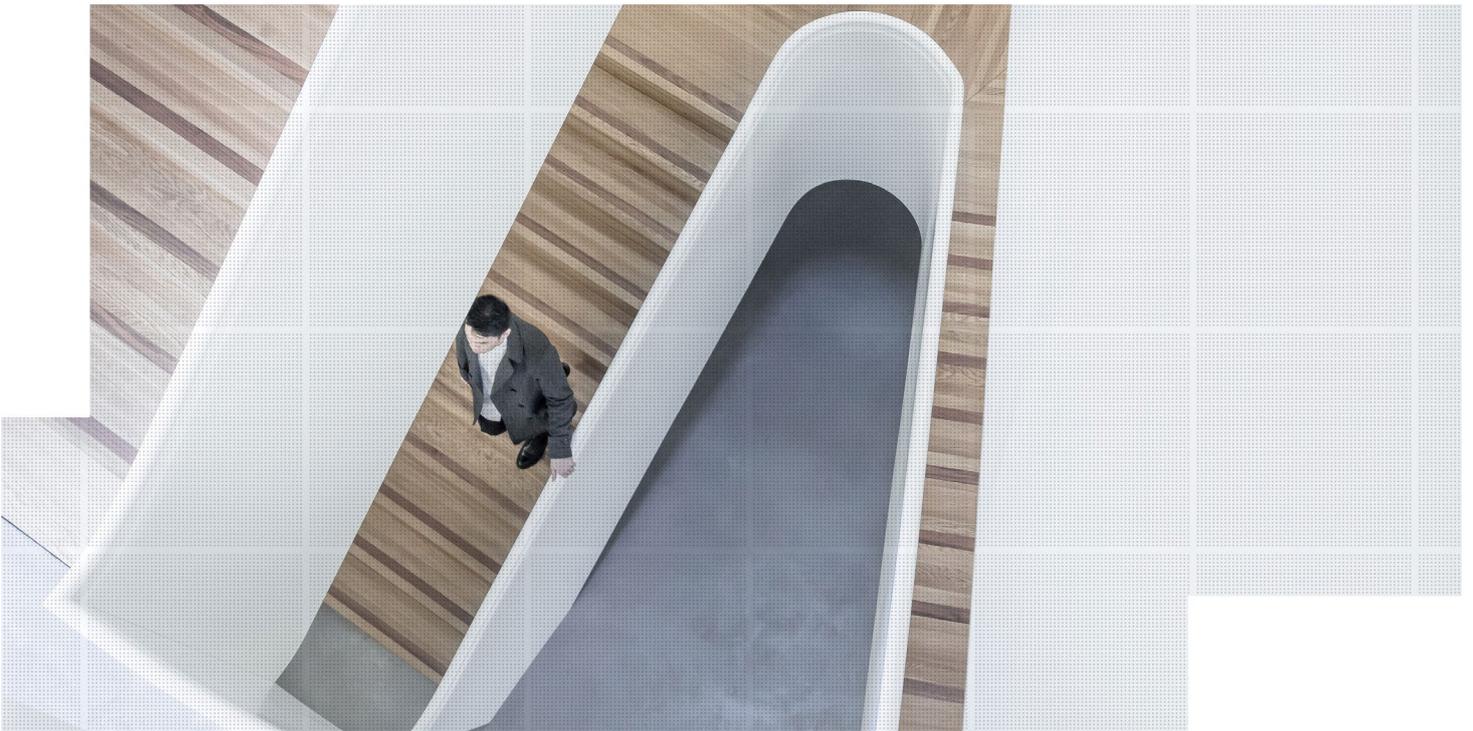


# Modern Slavery Statement



This Statement sets out the steps that KordaMentha and its associated entities as listed in Section 6 have taken in relation to our responsibilities under the Modern Slavery Act 2018 (Cth) to mitigate the risk of modern slavery within our business.

KordaMentha is an advisory and investment firm that provides services to clients throughout their lifecycle. We operate mainly in Australia with offices located in Singapore and Indonesia. Our workforce is mostly tertiary educated and members of professional associations.

## Our governance and approach



### Governance overview

KordaMentha is led by our Principals who oversee the Risk Management Committee. The Committee is responsible for ensuring key enterprise and operational risks are identified and appropriately mitigated, including issues such as modern slavery.

The Committee is led by Partner – Risk Management, Partner – Group Practice Management and Partner – Technology and supported by Associate Director – Risk Management.

All plans and actions are monitored by Partner – Risk Management and periodically assessed for effectiveness against the level of Modern Slavery risk.



### Our policies

Our Code of Conduct encourages employees to report any activity or behaviour which is unethical, illegal or unsafe, including modern slavery practices.

In 2019, we introduced the Integrity Suite – a collection of existing policies to further raise awareness and expectations on:

- Risk management framework
- Privacy
- Whistleblowing
- Anti-fraud and corruption.

All KordaMentha employees have the responsibility to act with integrity and in accordance with the corporate policies.



### Training and communications

In 2019, we invested in a new policy management system – myPolicies to better enable employees to access, read and acknowledge their understanding of KordaMentha's policies. This reading and acknowledgement of policies has now formed part of employees' performance appraisal.

KordaMentha provides regular training to all employees on a range of topics in the ethics arena. In 2022, our topics covered an overview of risk management and conflicts of interest.



### Our commitment

We are committed to deal with reputable suppliers that are residing in Australia's major cities and share similar values.



### Our suppliers

As an advisory and investment firm, we are office-based and predominantly procure goods and services to enable our people to deliver our services.

Our major expenditure categories are from the following sectors: leasing of office space, technology, travel, legal fees and office supplies.

## Initiatives

### Recent

In 2019, we introduced:

- Integrity Suite – a collection of integrity related policies
- Integrity campaign – focusing on doing the right thing
- myPolicies – a new policy management system.

In 2020, we introduced:

- our Modern Slavery Statement
- Supplier Modern Slavery Code of Conduct
- Supplier Modern Slavery Code of Conduct declaration which had been provided to and acknowledged by suppliers in key areas as identified via our risk assessment process.

In 2021, we:

- communicated our stance on Modern Slavery to all staff via internal communication channels
- focused on our technology suppliers including in some cases, beyond the first-tier suppliers
- established an Environment, Social and Governance (ESG) working group where modern slavery falls within the Governance stream.

In 2022, we:

- sought reaffirmation from our suppliers in key areas on our Supplier Modern Slavery Code of Conduct
- identified key technology suppliers according to total spend and their risk profiles
- reached out to key technology suppliers on our Supplier Modern Slavery Code of Conduct
- commenced development of a supplier management framework to include guidelines on procurement decisions-making and enhanced due diligence and monitoring for existing and new suppliers.

Our periodic risk assessment on modern slavery did not identify any instances of modern slavery associated directly with our operations and supply chain.

### Upcoming

We are into the final year of our three-year plan to:

- Develop guidelines on procurement decisions-making
- Roll out specific training for stakeholders
- Assess the effectiveness of our risk management process and controls
- Enhance due diligence for existing and new suppliers.

### Associated KordaMentha entities

This Statement also applies to the list of associated KordaMentha entities referred in Appendix 1.

The Risk Management Committee is responsible for the modern slavery risk identification and assessment and implementation of appropriate measures for associated KordaMentha entities which often share common resources and Directors. When relevant, feedback and comments will be sought with the Partners, Managing Directors or Directors of the entities.

### Summary

As an advisory and investment firm with a professional workforce, KordaMentha considers the risk of modern slavery within its direct business operations to be very low. However, we recognise that we can still be indirectly exposed through our supply chain. We will continue to undertake periodic risk assessment on our business operations and supply chain and proactively take steps to address those risks.

This statement was approved by the board of KordaMentha Pty Ltd atf KM Unit Trust on 13 April 2023, on behalf of KordaMentha Pty Ltd and the reporting entities listed in Appendix 1 of this statement.



**Mark Korda**  
Director, KordaMentha Pty Ltd

13 April 2023  
Date



**Mark Mentha**  
Director, KordaMentha Pty Ltd

13 April 2023  
Date

# Appendix 1

## Listing of associated KordaMentha entities

12 December 2022

- KordaMentha Pty Ltd atf KM Unit Trust
- 333 Capital Pty Ltd atf 333 Capital Unit Trust
- 525 Advisory Pty Ltd
- KordaMentha Investments Pty Ltd in its own right and atf KordaMentha Investments (PPCC) Trust and KordaMentha
- Investments Property Trust
- KordaMentha Real Estate Pty Ltd including as manager of various property funds
- KM Develop Pty Ltd atf KM Develop Trust
- Pezet Matheson Pty Ltd atf Pezet Matheson Unit Trust
- KM Trustee Services Pty Ltd
- KordaMentha Funds Management Pty Ltd as the responsible entity of various property funds
- KM Design & Construct Pty Ltd
- KM Property Funds Limited as the responsible entity of various property funds
- KordaMentha Nominees Pty Ltd
- KM Custodians Pty Ltd
- KM Holdings Pty Ltd atf KM Licence Trust and atf KM Office Unit Trust
- BOK SPV Pty Ltd
- KM Develop Ashburton Pty Ltd
- KM Develop Ivanhoe Pty Ltd
- KM Construct Ashburton Pty Ltd
- KM Construct Ivanhoe Pty Ltd
- SPV Bedford Park (Adelaide) Pty Ltd
- SPV Cambridge (Hobart) Pty Ltd
- SPV CBPF Holdings Pty Ltd
- KordaMentha Pte Ltd
- PT KordaMentha
- 48 Dundee Pty Ltd
- 69 Hickford Pty Ltd
- 73 Webb Rd Pty Ltd
- Accordius Pty Ltd atf Accordius Unit Trust
- Arthur Andersen Pty Ltd
- BKM Melb Rd Pty Ltd
- KM Bracken Ridge Pty Ltd atf Bracken Ridge Trust
- BuyMyHome (Agency) Pty Ltd
- BuyMyHome Pty Ltd
- BuyMyPlace Finance Pty Ltd
- CRTPF SPV No. 1 Pty Ltd
- CRTPF SPV No. 2 Pty Ltd
- CRTPF SPV No. 3 Pty Ltd
- CRTPF SPV No. 4 Pty Ltd
- CSS SPV No. 1 Pty Ltd atf CSS Subtrust 1
- CSS SPV No. 2 Pty Ltd atf CSS Subtrust 2
- CSS SPV No. 3 Pty Ltd atf CSS Subtrust 3
- KM SEQ Pty Ltd atf Greenbank Trust
- KM (Flinders Holdco) Pty Ltd
- KM Bayswater Pty Ltd atf KM Bayswater Trust
- KM Devco CRTPF Pty Ltd
- KM Develop Albany Creek Pty Ltd
- KMAML Holdings Pty Ltd
- KMAML Investments Pty Ltd
- KMMKIV Pty Ltd atf KMMK Trust and atf KMMKCB Trust
- KMMKCB Pty Ltd
- KMMKCB Two Pty Ltd atf KMMKSPV Two Trust
- KMMMIV Pty Ltd atf KMMM Trust and atf KMMMCB Trust
- KMMMCB Pty Ltd
- KMMMCB Two Pty Ltd atf KMMMSPV Two Trust
- KMSAC Pty Ltd
- KMSAH Pty Ltd
- KordaMentha Shelf Co 23 Pty Ltd
- KordaMentha Shelf Co 24 Pty Ltd
- KordaMentha Shelf Co 25 Pty Ltd
- KordaMentha Shelf Co (APMSPSAF) Pty Ltd
- KORdevelopments Pty Ltd
- MKCB3 Pty Ltd
- MMCB3 Pty Ltd
- Murray Waldren Consulting Pty Ltd
- My Place Holdings Pty Ltd
- Operations Support Services Pty Ltd
- Philip Avenue Pty Ltd atf Philip Avenue Unit Trust
- sellmyplace.com.au Pty Ltd
- Small Business Restructuring Pty Ltd
- SPV 685 Pty Ltd
- SPV1G Pty Ltd
- SPVBBPI Pty Ltd
- 158 Purinuan Pty Ltd

