

Modern Slavery Statement (“Statement”)

Reporting Period: 1 July 2023 – 30 June 2024

Reporting Entity

This Statement has been prepared by 9TE Developer Pty Ltd ABN 35 666 875 850 (the “**Reporting Entity**”) pursuant to section 14 of the *Commonwealth Modern Slavery Act 2018* (“**MSA**”) and relates to the period from 1 July 2023 to 30 June 2024 (the “**Reporting Period**”). In this Statement, references to “we”, “us” or “our” refer to the Reporting Entity. It will be the first statement for the Reporting Entity under the MSA.

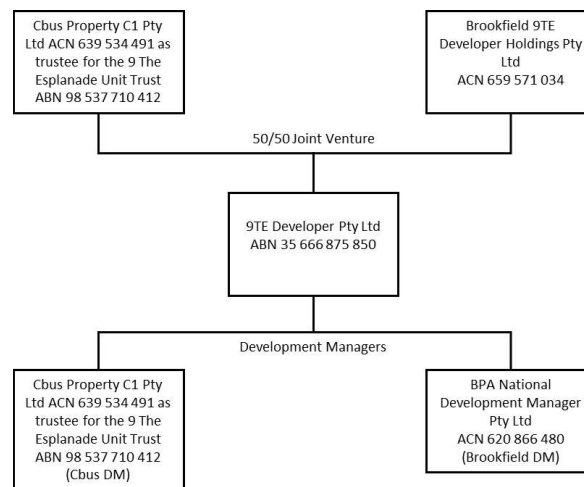
Mandatory Criteria

Modern Slavery Act Mandatory Criteria	Modern Slavery Statement Section Reference	Page
Identify the reporting entity	Reporting Entity	1
Describe the reporting entity’s structure, operations and supply chains	Our Structure, Operations and Supply Chain	2
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Risks of modern slavery practices in our operations and supply chains	2
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address these risks, including due diligence and remediation processes	Our actions to assess and address modern slavery risks	3
Describe how the reporting entity assesses the effectiveness of these actions	Assessing the effectiveness of actions taken and continuous improvement	5
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Process of Consultation	5
Provide any other relevant information	None	6

Our Structure, Operations and Supply Chain

The Reporting Entity was incorporated on 29 March 2023, as a 50/50 joint venture between Brookfield 9TE Developer Holdings Pty Ltd ACN 659 571 034¹ and Cbus Property C1 Pty Ltd ACN 639 534 491² as trustee for the 9 The Esplanade Unit Trust ABN 98 537 710 412 (each a “**JV Party**” and together the “**JV Parties**”). The principal activity of the Reporting Entity is to develop a commercial tower at Nine The Esplanade Elizabeth Quay, Perth, a premium-grade office building in Perth’s CBD, on behalf of the owners of the property (“**Property**”). The Reporting Entity operates in Australia.

The Reporting Entity appointed BPA National Development Manager Pty Ltd ACN 620 866 480 and CBUS Property Developments Pty Ltd ACN 119 830 965 as trustee for Cbus Property Developments Unit Trust ABN 52 727 663 483 as development managers to carry out development management services (each a “**Development Manager**” and together the “**Development Managers**”). Each of the Development Managers is a member of the same corporate group as its respective JV Party.



The Reporting Entity's supply chains generally fall under the below categories:

DEVELOPMENT AND CONSTRUCTION

Includes head contractor, development manager

PROFESSIONAL SERVICES

Includes consultants, lawyers

These organisations are headquartered in Australia.

Risks of modern slavery practices in our operations and supply chains

OUR OPERATIONS – EMPLOYEES

The Reporting Entity does not have any employees.

Each Development Manager is required to supply all personnel necessary for the performance of its respective obligations. Reference to employees made in this Statement therefore refers to the employees of the Development Managers.

Each Development Manager operates in Australia and their workforces are comprised of permanent employees, max-term employees, and casual employees. The Development Managers do not use workers from labour hire agencies.

¹ Ultimately owned by Brookfield Corporation.

² Ultimately owned by United Super Pty Ltd as Trustee for the Construction and Building Unions Superannuation Fund

The Development Managers' employees who perform functions for, or on behalf of, the Reporting Entity, are employed in Australia and are professional and administrative staff. The Development Managers, through their respective corporate groups, have established human resources policies, procedures and processes to safeguard against modern slavery and human trafficking within their workforce. These measures include:

- Employment conditions
- Mechanisms for reporting and resolving employee concerns and grievances
- Non-discriminatory hiring practices
- Employment screening, including work eligibility checks
- Standards for appropriate workplace behavior

Employees must create a respectful environment and report workplace discrimination, violence and harassment. Annual training on these issues, which includes Modern Slavery, is provided to staff.

Based on the above, it is assessed that there is a low risk of modern slavery within the employee population of the Development Managers.

OUR SUPPLY CHAIN

The Development Managers oversee and support the Reporting Entity in managing the procurement of goods and services for the Reporting Entity's obligations as Developer of the Property. They use indices and resources to identify countries or other factors that may pose a higher risk of human rights violations and modern slavery conditions.

Construction and development has been identified as having an increased risk of modern slavery within the Reporting Entity's supply chain. This is due to higher demand for a base-skill workforce and the potential for materials and supplies being procured from high-risk geographies. The Reporting Entity engaged the head contractor under a 'design and construct' contract for these works, which included the procurement of building materials, design consultants, labour services and trades to develop the Property under the contract specifications. The Development Managers in turn assist the Reporting Entity in managing the head contractor and the associated design and construct contract.

Our actions to assess and address modern slavery risks

1. Governance

The JV Parties recognise that strong governance is essential to sustainable business operations, aiming to conduct the business of the Reporting Entity according to the highest ethical and legal standards. The approach to addressing modern slavery is designed to be commensurate with the varying risks influenced by factors such as jurisdiction, industry and sector.

Each JV Party has a Policy Framework of key supporting policies and guidelines including, but are not limited to:

HUMAN RIGHTS AND ANTI-MODERN SLAVERY

Establishes a framework for minimising the risk of human rights violations and modern slavery within the business operations and supply chain.

CODE OF BUSINESS CONDUCT AND ETHICS

The Code sets out the expected employee conduct in relation to honesty, integrity and compliance with legal and regulatory requirements.

WHISTLEBLOWING

This Policy sets out the expectations of reporting and responsibilities, and outlines whistleblowing procedures addressing how to raise a concern, confidentiality, as well as remediation, external disclosures and our zero tolerance for retaliation or malicious acts.

VENDOR MANAGEMENT

The JV Parties expect material providers of goods or services to the Reporting Entity to adhere to ethics and compliance commitments similar to those set out in their relevant codes and guidelines, and to the extent applicable, to have the necessary policies and procedures in place to support such commitments within their business and supply chain. These codes set out expectations of vendors that provide goods or services to the Reporting Entity and vendor contracts include adherence to reference to equivalent vendor policies.

Each JV Party's approach to addressing high-risk, third-party vendors includes conducting enhanced due diligence checks, the use of specific contract clauses in legal agreements, requiring vendors to provide their modern slavery statement and evidence modern slavery mitigation strategies.

FINANCIAL CRIME

These include anti-bribery and corruption, and anti-money laundering programs that are designed to prevent financial crime and the movement of money derived from crime (including crimes relating to modern slavery).

Modern slavery and financial crime are closely linked, as proceeds from modern slavery and human trafficking need to be 'cleaned' before entering the mainstream economy. Therefore, preventing the onboarding of those involved in financial crime, identifying suspicious or criminal activity and making reports to the relevant authorities not only supports the fight against money laundering, but also, by association, the fight against modern slavery.

POSITIVE WORK ENVIRONMENT

The JV Parties and the Development Managers are committed to providing a workplace free of discrimination, violence and harassment and summarises the responsibilities of employees, directors, officers and any temporary workers to which the policy applies to understand: (i) what constitutes workplace discrimination, violence and harassment; (ii) their obligations to maintain an environment where these behaviors are not tolerated; and (iii) how to report incidents following proper procedures.

Applicable Policy Frameworks are reviewed periodically and updated as necessary as part of corporate group governance practices.

2. Training

The JV Parties and Development Managers place importance on creating a culture that promotes high standards of ethical behavior as well as the protection of human rights. They continue to raise awareness and commit to providing human rights training, which includes the topic of modern slavery, to new employees who participate in our investment advisory business and those in high-risk roles as part of the onboarding process, with ongoing training provided, as necessary. Additional training relevant to applicable regions and role, particularly in higher-risk functions such as procurement is provided.

3. Risk Assessment

Risk assessments are important to the Reporting Entity's efforts to identify and prevent human rights violations within our business and supply chain.

The Reporting Entity, through the JV Parties, uses a risk-based program to address modern slavery risks from vendor onboarding through ongoing management. All vendors undergo prequalification, which includes questionnaires, categorisation, and due diligence to identify modern slavery risks in the supply chain. Vendors receive a risk rating based on this assessment and corresponding mitigation strategies.

4. Remediation

No evidence has been found of the Reporting Entity having caused or contributed to modern slavery in its operations or supply chain.

5. Whistleblowing Hotline

The Reporting Entity, through the JV Parties, maintains a reporting hotline (“**Hotline**”) for employees, vendors, partners and other interested parties to anonymously report, among other things, any matters relating to suspected unethical, illegal, unsafe or other unwanted behaviors. Modern slavery and human trafficking issues are reportable on the Hotline. The Hotlines are managed by independent third parties and are accessible 24/7 by telephone or by submitting an anonymous report online. The Hotlines are available in multiple languages to mitigate any language barriers and to provide information to those intending to report.

Assessing the effectiveness of actions taken and continuous improvement

The Reporting Entity acknowledges that modern slavery and human trafficking are possible risks within its business operations and supply chain. Various steps are undertaken to address these risks, including review of policies and business practices through each JV Parties’ corporate group to ensure they reflect a commitment to:

- Implementing and utilising effective systems and controls designed to reduce the risk of modern slavery in our business and supply chains
- Transparency through our disclosure obligations

The effectiveness of the modern slavery risk management processes will be monitored and assessed through:

- Regular engagement and feedback from key stakeholders, including through active promotion of any Reporting Hotline
- Monitoring and reporting of risks to management through operational risk and board reporting frameworks
- Independent third-party reporting of any reports made to a Reporting Hotline, which are then investigated. Trends in reporting are assessed, including modern slavery risk (if present)
- Review and enhance measurement indicators in line with continuous improvement. These include:

Number of Reported Incidents	FY23/24
Modern slavery in our operations	0
Modern slavery in our supply chain	0
Modern slavery reported to our Hotline	0
In relation to the Positive Work Environment Policy	0

Process of Consultation

The Reporting Entity manages the preparation of the modern slavery statement through representatives of each of the JV Parties.

The JV Parties coordinate the development and implementation of the Reporting Entity’s modern slavery approach and work to properly integrate this approach with each JV Party’s core business activities, including contracts, due diligence processes, training and communications, as appropriate. This framework has been developed through collaborative consultation with relevant internal stakeholders and, where appropriate, external advisors to verify that policies and processes meet applicable legal requirements. This Statement and the related policies and procedures are reviewed at least annually and maintained in line with the business environment in which the Reporting Entity’s operations are conducted. Ongoing consultation also takes place through various forums such as management meetings, board and committee meetings and periodic reviews associated with the risks of each business within scope.

The Statement was reviewed by members of the JV Parties’ leadership teams before being formally approved by the board of directors of the Reporting Entity.

Approval

This Statement has been prepared in collaboration with representatives from each of the JV Parties and has been approved by the board of directors of the Reporting Entity pursuant to section 13(2)(c) of the MSA on 25 November 2025.

<i>Executed by 9TE Developer Pty Ltd ACN 666 875 850 in accordance with section 127 of the Corporations Act 2001 (Cth):</i>	
	
Signature of Director	Signature of Director
Nicholas Britten-Jones	Chris Kakoufas
Name of Director	Name of Director