



Modern Slavery Statement

Plenary Conventions (GCEC) Unit Trust and
Plenary Conventions (GCEC) Holdings Unit Trust

FY 2025

Contents

Introduction	2
What is Modern Slavery?	2
Our Vision	2
Reporting Entities	3
Our Structure, Operations and Supply Chains	4
Our Structure	4
Our Operations	4
Our Supply Chains	5
Risk of Modern Slavery Practices in Our Operations and Supply Chains	6
Our Operations	7
Our Supply Chains	7
Actions Taken by Plenary Conventions (GCEC) to Assess and Address Modern Slavery Risks	8
Assess	8
Address	8
Remediation Processes	9
Assessing the Effectiveness of Actions Being Taken to Assess and Address Modern Slavery Risks	10
Consultation	11
Additional Information	12
Approval	13

Introduction

What is Modern Slavery?

“Modern slavery” refers to various forms of exploitation and coercive practices that deprive individuals of their freedom, rights and dignity. It encompasses situations where individuals are forced or coerced into labour, servitude or human trafficking against their will.

The International Labour Organisation (ILO), Walk Free and the International Organisation for Migration (IOM) assessed, in their most recent Global Estimates of Modern Slavery, that 49.6 million people were living in modern slavery on any given day in 2021 (most current data publicly available), which is an increase of 10 million people in comparison to 2016¹. In times of crisis (widespread environmental degradation, assaults on democracy in many countries, a global rollback of women’s rights, increasing and more complex armed conflicts) the world’s most vulnerable people are hit the hardest and fastest.

Our Vision

Plenary Conventions (GCEC) Unit Trust and Plenary Conventions (GCEC) Holdings Unit trust (together ‘**Plenary Conventions (GCEC)**’) is delivering the \$449 million Nyaal Banyul Geelong Convention and Event Centre precinct development, which is one of the biggest developments in regional Victoria.

Plenary Conventions (GCEC) is conducting its business with high levels of ethical and professional standards and is committed to recognising and respecting human rights. We are committed to ongoing engagement with our stakeholders to better collaborate in respecting human rights and to identify and take steps to prevent modern slavery.

[1] Walk Free 2023, The Global Slavery Index 2023, Minderoo Foundation. Available from: <https://walkfree.org/global-slavery-index/>

Reporting Entities

This joint statement covers:

- ▼ Plenary Conventions (GCEC) Unit Trust; and
- ▼ Plenary Conventions (GCEC) Holdings Unit trust.

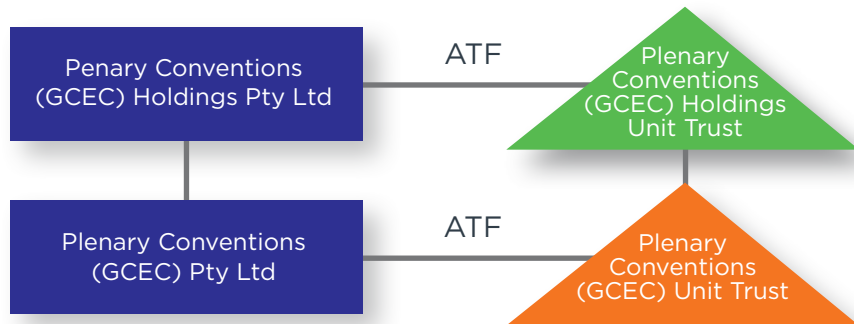
This Modern Slavery Statement covers Plenary Conventions (GCEC)'s reporting period of 1 January 2025 to 31 December 2025.

Our Structure, Operations and Supply Chains

Our Structure

Plenary Conventions (GCEC) is a special purpose vehicle (SPV) incorporated specifically for the financing, design, delivery and maintenance of the Nyaal Banyul Geelong Convention and Event Centre precinct during a concession period of 25 years (until 2051).

The structure of the SPV is as follows:



Plenary is the only shareholder of the SPV.

Our Operations

Plenary Conventions (GCEC) has been contracted by the Victorian Government to deliver the Nyaal Banyul Geelong Convention and Event Centre precinct development, as part of a Public Private Partnership (PPP).

The Plenary Conventions (GCEC) consortium comprises Plenary Group as sponsor and investor, Built as builder, Woods Bagot as architect and BGIS as facilities management services contractor.

The management of Plenary Conventions (GCEC) has been contracted to Plenary Asset Management Pty Ltd via a Management Services Deed for the period of the concession.

Plenary Asset Management Pty Ltd has allocated a management team of 4 people to Plenary Conventions (GCEC) for the delivery and management of the Geelong Convention Centre.

The Plenary Conventions (GCEC) will transform the 1.6-hectare waterfront car parking site into a precinct that welcomes locals and visitors alike as part of the precinct partnership. The Nyaal Banyul Geelong Convention and Event Centre precinct is an exciting regional project that will create hundreds of jobs during construction and ongoing jobs when complete.

Our Supply Chains

Our major direct suppliers for FY2025 were:

- ▼ Built Pty Ltd;
- ▼ BGIS Pty Ltd;
- ▼ Plenary Asset Management Pty Ltd

Our direct (tier 1) suppliers engage a range of suppliers and subcontractors to source goods and services to meet the delivery requirements of our contracts with them, and these suppliers and subcontractors may in turn source goods and services from third parties, resulting in a multi-layered supply chain to deliver the Project.

In addition to our major direct (tier 1) suppliers, Plenary Conventions (GCEC) has a range of other direct suppliers. The majority of these suppliers are engaged in professional services and consulting services.

The direct suppliers to the Project are all located in Australia, a country with a very low risk of incidences of modern slavery risk.

For the FY25 reporting period, Plenary Conventions (GCEC) partnered with a new third-party platform, Informed 365, to conduct due diligence on its supply chain. The Informed 365 platform has partnered with the Property Council of Australia to work on an industry-initiative to combat modern slavery (Property Council Modern Slavery Supplier Platform). As part of this collaboration with Informed 365, Plenary Conventions (GCEC) will participate in monthly meetings with Informed 365 and other industry partners to discuss initiatives on how to take a proactive approach to engage suppliers around modern slavery risk.

Risk of Modern Slavery Practices in Our Operations and Supply Chains

As part of our analysis to consider the risk of modern slavery practices in our supply chains, we referred to resources such as the Global Slavery Index 2023², materials and information on risks of modern slavery produced by the International Labour Organization and the Property, Construction & Modern Slavery report³.

We also considered relevant risks of modern slavery practices by reference to a range of intersecting factors such as business activities, labour force structure, social, political and environmental conditions in the countries in which we and our suppliers operate.

Neither Plenary Conventions (GCEC) Unit Trust nor Plenary Conventions (GCEC) Holdings Unit Trust owns or controls any other entities. The risks of modern slavery described in this Statement therefore relate to the operations and supply chains of the reporting entities themselves.

This platform was designed to enable the property and construction sector to use a single shared Supplier Assessment Questionnaire (SAQ), so suppliers only respond once across multiple members.

Plenary Conventions (GCEC) linked with its direct suppliers on the platform. Of these direct suppliers approximately 92% have been inherently risk assessed by reviewing the country and industry risk of each supplier. The consideration of these two risks provides an inherent risk (I365 Slavery Risk Index) for each supplier in the Plenary Conventions (GCEC) supply chain.

The inherent risk classification from very low to very high in the Informed365 platform is based on the combination of the country risk (which can range from very high in jurisdictions with a very high risk of modern slavery, such as e.g. North Korea to very low such as e.g. the United Kingdom) and the industry risk. The industries are classified as per the Global Industry Classification Standard (GICS) classification, which is a globally recognized system for classifying companies by industry. There are very high-risk industries such as the precious metals and minerals industries and low risk industries such as financial exchanges and data.

[2] Walk Free 2023, The Global Slavery Index 2023, Minderoo Foundation. Available from: <https://walkfree.org/global-slavery-index/>

[3] KPMG, Australian Human Rights Commission, 2020, Property, construction & modern slavery Practical responses for managing risk to people

Our Operations

In 2025 Plenary Conventions (GCEC)'s operations mainly concerned delivery activities for design and construction of the Nyaal Banyul Geelong Convention and Event Centre precinct.

The Design and Construction and the Facilities Management contractors for the project are both Australian based entities who have an obligation to comply with all relevant Australian legislation to provide a safe working environment for all staff working on the Nyaal Banyul Convention Centre project.

Our Supply Chains

Plenary Conventions (GCEC) has conducted an inherent risk assessment of our direct supply chain partners via Informed 365. Based on this inherent risk assessment, the risk of Plenary Conventions (GCEC) directly causing modern slavery is considered low (see below in the section 'Actions taken by Plenary Conventions (GCEC) to assess and address modern slavery risks').

Plenary Conventions (GCEC) acknowledges that there is a risk that it may unknowingly and unintentionally contribute to modern slavery through its role in negotiating the head and key subcontracts for the Project, pursuant to which multi-tiered supply chains are established to

provide goods and services to fulfil the Project requirements. However, Plenary Conventions (GCEC) considers that it has appropriate governance processes in place to mitigate against this risk.

Plenary Conventions (GCEC) also acknowledges that there is a risk its activities may be directly or indirectly connected to modern slavery due to the activities of third parties in the supply chain. Based on the results of the assessments described earlier, the risks of modern slavery would be less likely to arise in respect of the tier 1 contractors engaged on the project, and more likely to arise indirectly in deeper layers of the supply chain, including the extraction of raw materials and the manufacture of construction products in overseas jurisdictions at risk of modern slavery. Whilst Plenary Conventions (GCEC) has not identified any instances of modern slavery at this stage, collaborating with supply chain partners to gain greater insights into deeper layers of the supply chain remains an ongoing priority.

All direct suppliers who completed the Supplier Assessment Questionnaire (SAQ) confirmed that they provided training on human rights and modern slavery risks to their senior leadership team and board of directors.

Actions Taken by Plenary Conventions (GCEC) to Assess and Address Modern Slavery Risks

Assess

As set out above, Plenary Conventions (GCEC) used a third-party tool, Informed365, for the first time, transitioning from its previous third-party assessment tool. Plenary Conventions (GCEC) is of the view that this tool aligns more with the sector in which it operates.

As part of its focus on continuous improvement, visibility on the inherent risk of the entire direct supply chain is a key improvement to allow Plenary Conventions (GCEC) to meaningfully engage with its key direct suppliers regarding more detailed information about their practices in assessing their own supply chain and operations for potential risk of incidences of modern slavery.

Address

Since this was Plenary Conventions (GCEC)'s first year partnering with Informed 365 our focus was on gaining greater visibility of the inherent risk within the direct supply chain. This inherent risk assessment confirmed that there is a low risk that Plenary Conventions (GCEC) directly causes modern slavery risk across its direct supply chain.

Plenary Conventions (GCEC) has already engaged with a minor subset of its direct suppliers on Informed 365 and will continue to build engagement with its direct supply chain over future years.

Based on individual supplier's responses, Informed 365 may also generate a Continuous Improvement Pathway (CIP), identifying opportunities for improvement. A Continuous Improvement Pathway (CIP) may include: tailored feedback based on the supplier's SAQ responses, helpful resources such as toolkits, training, and templates and clear, manageable actions relevant to their organisation, sent directly to the supplier. A Continuous Improvement Pathway (CIP) is designed to support a supplier in strengthening their practices and demonstrating progress over time.

Plenary Conventions (GCEC) intends to continue working with its direct suppliers and the indirect supply chain to ensure continued awareness of risks of modern slavery and will check in with its direct suppliers to see whether any of the suggested action items or items of the Continuous Improvement Pathway (CIP) from the assessment have or will be implemented in the future.

Remediation Processes

Plenary Conventions (GCEC) is committed to investigating any reports of potential incidences of modern slavery occurring anywhere in our operations or supply chains.

In line with our vision and values we confirm that we would take all appropriate steps to rectify any confirmed incidences of modern slavery in our operations or supply chains.

We would work collaboratively with our suppliers and, if necessary, their suppliers, to achieve these goals. If, for any reason, progress in this regard was not possible, Plenary Conventions (GCEC) would consider a range of appropriate responses including potentially taking the necessary steps to sever its connections to the offending supplier or sub-supplier.

Reports of potential modern slavery can be made through the Plenary Group whistleblower policy, which also applies to Plenary Conventions (GCEC) and provides a confidential and protected channel for raising concerns.

Assessing the Effectiveness of Actions Being Taken to Assess and Address Modern Slavery Risks

In 2025, we have assessed the inherent risk of our direct suppliers by assessing their country and industry risk, which leads to an Informed365 Slavery Risk Index.

The inherent risk assessment formed the basis on which further due diligence was carried out on our supply chain. As this is Plenary Conventions (GCEC)'s first year of assessment via the Informed365 platform, FY2025 serves as the baseline year against which future effectiveness will be measured.

Key performance indicators to track progress will include:

- ▼ the percentage of direct suppliers with a completed inherent risk assessment;
- ▼ increasing the percentage of direct suppliers actively engaged via SAQ to at least 40%;
- ▼ the number of Continuous Improvement Pathways (CIPs) acted upon; and
- ▼ the integration of modern slavery considerations into management decision-making processes.

These indicators will be reviewed annually to assess progress and inform continuous improvement.

Consultation

Plenary Convention (GCEC)'s structure, including the relationship between the two reporting entities, is set out earlier in this Statement.

The Boards of Plenary Conventions (GCEC) Pty Ltd (as trustee of the Plenary Conventions (GCEC) Unit Trust) and Plenary Conventions (GCEC) Holdings Pty Ltd (as trustee of the Plenary Conventions (GCEC) Holdings Unit Trust) comprise the same directors and company secretary, and the day-to-day management of both reporting entities is carried out by a single management team provided by Plenary Asset Management Pty Ltd under a Management Services Deed.

The preparation of this Statement involved consultation between the boards and management of both reporting entities, including review and input from legal, finance and corporate affairs functions.

Additional Information

Plenary Conventions (GCEC) is committed to working to improve our assessment and management of modern slavery risks and will continue to engage on awareness of modern slavery risks with current stakeholders during 2026. Plenary Conventions (GCEC) will strengthen engagement with, and due diligence on, direct supply chain partners not yet assessed further.

Approval

This joint Modern Slavery Statement is made in accordance with section 14 of the Modern Slavery Act 2018 (Cth).

This statement was prepared by Plenary Conventions (GCEC) Pty Ltd (as trustee of the Plenary Conventions (GCEC) Unit Trust) and Plenary Conventions (GCEC) Holdings Pty Ltd (as trustee of the Plenary Conventions (GCEC) Holdings Unit Trust) and has been approved by the Boards of Directors of both Plenary Conventions (GCEC) Pty Ltd and Plenary Conventions (GCEC) Holdings Pty Ltd.



.....
Signed for and on behalf of Plenary Conventions (GCEC) Unit Trust
and Plenary Conventions (GCEC) Holdings Unit Trust

Glenn Hay
Chair

Plenary Conventions (GCEC) Pty Ltd
Plenary Conventions (GCEC) Holdings Pty Ltd

