

Frasers Property Australia
Frasers Property Industrial
FLT Australia Trust



Joint Modern Slavery Statement FY2021





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Frasers Property acknowledges the Traditional Custodians of the land on which our business operates, and recognises their continuing connection to land, waters and community. We pay our respects to Aboriginal and Torres Strait Islander Elders past, present and emerging.

ABOUT THIS STATEMENT

This Modern Slavery Statement has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) by Frasers Property Australia Pty Ltd ABN 89 600 448 726 (Frasers Property Australia), Frasers Property Industrial Australia Pty Limited ABN 22 107 356 454 (Frasers Property Industrial), and Frasers Property Funds Management Limited as trustee of FLT Australia Trust ABN 73 542 867 051 (FLT Australia Trust), (hereby referred to as 'Frasers Property' or 'we'/'our') for the period from 1 October 2020 to 30 September 2021 (FY21).

The Statement outlines our structure, operations and supply chains, and the associated risk of modern slavery. It details the steps Frasers Property has taken to assess and address these risks, and how we evaluate the effectiveness of our actions.

Each reporting entity has been consulted in the development of this Statement through active engagement with relevant internal stakeholders as identified by Frasers Property's Sustainability Team. The consultation process commenced in January 2022 with a presentation to representatives from across the business to introduce the reporting requirements of the *Modern Slavery Act 2018* (Cth) and provide an overview of Frasers Property's progress toward reducing our modern slavery risks. Thereafter, these representatives, in addition to each reporting entities' CEOs and Executive Management Teams, were requested to review and endorse this Statement.

This Statement has been approved by the Boards of Frasers Property Australia, Frasers Property Industrial and FLT Australia Trust as at 24 March 2022.

Modern Slavery Act 2018 (Cth) reporting criteria

Criterion	Reference
Identify the reporting entity	4
Describe the structure, operations and supply chains of the reporting entity	6-9
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	10-11
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	13-23
Describe how the reporting entity assesses the effectiveness of such actions	24
Describe the process of consultation with any entities that the reporting entity owns or controls, and in the case of a reporting entity covered by a joint Modern Slavery Statement - the entity giving the statement	4
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	5, 25-27

MESSAGE FROM THE CEOS

At Frasers Property, we are committed to respecting, protecting, and improving the rights and wellbeing of all people. Modern slavery is a serious violation of human rights, and so we take a zero-tolerance approach to the unacceptable forms of exploitation that constitute modern slavery.

As a sustainability leader in the property industry in Australia, we not only have a responsibility to contribute to the eradication of modern slavery, but we also have an opportunity to drive momentum towards achieving this common goal.

Our aim is to eliminate modern slavery within our operations and supply chains by preventing, mitigating, and remediating its risks. Our approach to achieving this goal is guided by the United Nations Guiding Principles on Business and Human Rights and our company values: Respectful, Real, Collaborative, Progressive.

We respect our people, so we do not tolerate any behaviour that is in breach of the law or that is non-compliant with our corporate policies, and we expect our employees and suppliers to adhere to our standards.

We know that we must work collectively and transparently with our peers, partners, employees, and suppliers as we work toward abolishing modern slavery. While we have been focusing on this for many years, March 2021 marked a significant step forward for Frasers Property as we published our first Modern Slavery Statement. This financial year, we have built upon the progress made in FY20 and will continue to disclose our growth through these annual statements.

While Frasers Property has made significant headway over the past few years, we know that there is still a long journey ahead, and so we are committed to progressively working towards combating modern slavery as we continue to expand our knowledge and experience.



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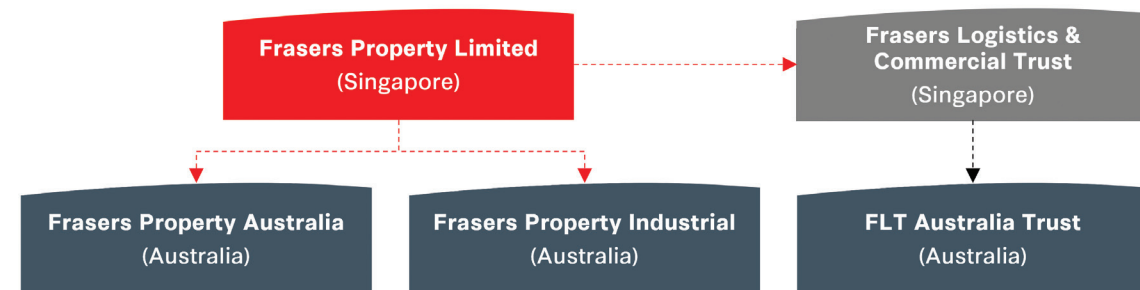
Robert Wallace
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Management Limited as trustee
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STRUCTURE & OPERATIONS

About Frasers Property

Frasers Property Australia, Frasers Property Industrial, and FLT Australia Trust are all subsidiaries of Frasers Property Limited (Group) – our parent company headquartered in Singapore. Frasers Property Limited is a multi-national company that develops, owns, and manages a diverse, integrated portfolio of properties. The Group is a signatory of the United Nations Global Compact and is listed on the Main Board of the Singapore Exchange Securities Trading Limited with a total asset value of approximately S\$40.3 billion as at 30 September 2021. Assets include commercial and business parks, retail, industrial and logistics, residential, and hospitality located in Australia, China, Europe, Thailand, Singapore and Vietnam, among other regions.

Our business structure



Our operations include property development, asset management, property operations, and corporate operations, all of which are primarily located within the boundaries of Sydney, Melbourne, Brisbane, and Perth. We collectively employ 634 employees (as at 30 September 2021) across development, planning, design, construction, finance, sales and marketing, property and building management, customer service, and the corporate roles that service business operations.

Risk Management

Our Risk Management Policy sets out our approach to risk management, which includes a no-risk appetite for modern slavery in the production and/or supply chain. This Policy provides details of our risk governance framework, which identifies who in the business is involved in risk management and what their underlying responsibilities are. Risk management at Frasers Property starts with our Board, who are responsible for monitoring the effectiveness of risk management, internal control and compliance processes, and ends with our employees and contractors, who are accountable for complying with our risk management policies and procedures.

STRUCTURE & OPERATIONS

Frasers Property Australia

Frasers Property Australia is one of Australia's leading diversified property groups. With a rich heritage dating back to 1924, we continue to create stronger, smarter, happier neighbourhoods.

Frasers Property Australia's activities comprise of the development of residential land, housing and apartments, build-to-rent, commercial, retail and mixed-use properties, as well as the ownership and management of investment property, incorporating property and asset management services. As at 30 September 2021, Frasers Property Australia's portfolio comprised of 42 assets valued at over AUD\$2 billion.

Frasers Property Australia also owns Real Utilities, a stand-alone business and a licensed Australian energy retailer with the mission to be greener, cheaper and simpler. Real Utilities installs and operates its own energy infrastructure such as solar panels, batteries and biodiesel generators, enabling it to provide a combination of renewable energy, certified carbon offsets and certified renewable energy certificates to future-proof its customers' properties and operations.

Our Sustainability Strategy

In 2015, Frasers Property launched *A Different Way* – our vision for a more sustainable future. It is our commitment as a business to create places where resources are re-used, recycled, and restored, to foster new ideas and undertake tangible initiatives to help people lead happier and healthier lives. We continue to deliver on this commitment through the three pillars: Acting Progressively, Consuming Responsibly and Focusing on People, with a particular emphasis on collaborating with our supply chain to ensure that we source safe, renewable, and responsible materials.

Frasers Property Industrial

Frasers Property Industrial is a multi-national owner, developer and manager with a growing reputation as a market leader in the industrial, logistics and commercial property sectors. Business operations include integrated development, asset management and third-party capital management capabilities across industrial and logistics markets in Australia, Germany, the Netherlands and Austria.

Within Australia, Frasers Property Industrial's portfolio consists of 30 industrial and commercial assets worth over AUD\$1.5 billion as at 30 September 2021. Frasers Property Industrial also provides property management services to Frasers Logistics & Commercial Trust for logistics and industrial properties in Australia, Germany and the Netherlands.

STRUCTURE & OPERATIONS

FLT Australia Trust

FLT Australia Trust is a subsidiary of [Fraser's Logistics & Commercial Trust](#) (FLCT) – a Singapore-listed real estate investment trust with a portfolio comprising of industrial and commercial properties across Australia, Germany, Singapore, the United Kingdom and the Netherlands.

FLCT was listed on the Mainboard of Singapore Exchange Securities Trading Limited on 20 June 2016 as Fraser's Logistics & Industrial Trust but was subsequently renamed FLCT on 29 April 2020 following the completion of a merger with Fraser's Commercial Trust.

FLT Australia Trust operates within Australia and holds 62 properties worth almost AUD\$3.4 billion as at 30 September 2021. The property manager for the Australian properties is Fraser's Property Management Services Pty Ltd – a wholly-owned indirect subsidiary of Fraser's Property Australia.

Our business operations

Fraser's Property Australia



Fraser's Property Industrial



FLT Australia Trust



OUR SUPPLY CHAIN

As a property developer, owner and manager of a diverse asset portfolio, Fraser's Property directly procures a wide range of goods and services relevant to the built environment. We also outsource some of our operational functions and delivery processes to third-party contractors who acquire goods and services on our behalf. Our procurement spend can be broadly segregated into the following categories.

Fraser's Property's procurement categories

Goods and services for our asset development

This includes goods such as timber and steel, and services such as landscaping and waste removal.

Goods and services for our asset operations

This includes goods such as air conditioning filters and sub-meters, and services such as cleaning and maintenance.

Goods and services for our corporate operations

This includes goods such as stationery and IT equipment, and services such as business flights and accommodation.

We source these goods and services from a variety of carefully selected suppliers and business partners, ranging from multi-national organisations to small family-owned businesses. In FY21, we engaged with 2703 direct suppliers (Tier 1), procuring more than AUD\$1 billion in goods and services. Of these suppliers, 97.5% are Australian businesses, while the remaining 2.5% are predominantly located in Hong Kong. However, we are conscious that our Tier 1 suppliers have their own diverse and complex supply chains that can extend beyond the boundaries of Australia.

Our FY21 supply chain



MODERN SLAVERY RISKS

The Global Context

The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. The *Modern Slavery Act 2018* (Cth) defines modern slavery as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour¹.

Globally, there is an estimated 40.3 million victims of modern slavery as at 2016². Approximately 18% of these modern slavery victims are in the construction industry and 22% of forced labour victims are involved in the manufacturing and production of raw materials, which are key supplies for the property and construction sector³. The property and construction industries are especially vulnerable to modern slavery due to the high demand for low-skilled labour, a lack of visibility of the complex and extensive supply chains, and the vast number of low-tier suppliers operating in high-risk locations⁴. This is evident in the supply chains of solar panels and personal protective equipment, which have been flagged as having significantly high volumes of modern slavery.

Solar Energy Risks

The manufacturing of solar modules has recently emerged as an industry at high risk of modern slavery, particularly in the Xinjiang Uyghur Autonomous Region⁵. As a property developer, owner and manager who engages with solar panel suppliers, we know that steps need to be taken to address these risks within our supply chains. As this is an emerging concern with risks reaching well beyond our direct suppliers, we have yet to delve into addressing these risks. This is one of our priorities for FY22, and we will continue to work closely with internal stakeholders and industry experts to develop an approach to mitigating the risk of modern slavery in this industry.

The Australian Context

In Australia, it is estimated that there are 15,000 people living in conditions of modern slavery as at 2016⁶. While this is comparatively low compared to many other regions in the world, a more concerning figure is that only 1 in 5 of these victims are identified⁷. Most modern slavery cases in Australia involve migrants, as they are particularly susceptible due to the inherent vulnerabilities of low-skilled temporary migration⁸. This is likely to increase over time, not only in Australia, but globally, as the impacts of climate change and political conflict evolve.

The *Modern Slavery Act 2018* (Cth) aims to address these issues by requiring specific entities with operations in Australia to report on the actions they are taking to mitigate and remediate modern slavery in their operations and supply chains.

1. The Department of Home Affairs (2019). Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities. [online] Available at: <https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf>.
2. International Labour Organization (2018). Forced labour, Modern Slavery and Human Trafficking (Forced labour, Modern Slavery and Human trafficking). [online] ilo.org. Available at: <https://www.ilo.org/global/topics/forced-labour/lang-en/index.htm>.
3. Australian Human Rights Commission and KPMG Banarra (2020). Property, Construction and Modern Slavery (2020) | Australian Human Rights Commission. [online] humanrights.gov.au. Available at: <https://humanrights.gov.au/our-work/business-and-human-rights/publications/property-construction-and-modern-slavery-2020>.
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5. Murphy, L. and Elimä, N. (2021). In Broad Daylight Uyghur Forced Labour in the Solar Supply Chain | Sheffield Hallam University. [online] www.shu.ac.uk. Available at: <https://www.shu.ac.uk/helena-kennedy-centre-international-justice/research-and-projects/all-projects/in-broad-daylight>.
6. Australian Human Rights Commission and KPMG Australia (2021). Combatting modern slavery in the health services sector. [online] humanrights.gov.au. Available at: <https://humanrights.gov.au/about/news/combating-modern-slavery-health-services-sector>.
7. Anti-Slavery Australia (2016). Modern Slavery | Anti Slavery Australia. [online] antislavery.org.au. Available at: <https://antislavery.org.au/modern-slavery/>.
8. Global Slavery Index (2019). Australia | Global Slavery Index. [online] [Globallslaveryindex.org](https://www.globallslaveryindex.org). Available at: <https://www.globallslaveryindex.org/2018/findings/country-studies/australia/>.

MODERN SLAVERY RISKS

Our Modern Slavery Risks

At Frasers Property, most of our workforce is employed directly through our People and Culture Team, which significantly lowers the risk of modern slavery within our operations. We do occasionally employ temporary staff via recruitment agencies for short-term engagements; however, these employees are vetted internally prior to engagement. To ensure that our employees are aware of their rights, all staff are provided with access to and training on our policies and procedures relating to employment, which are regularly reviewed and updated in line with current legislation and best practice.

The risk of modern slavery is significantly higher in our supply chain, particularly in situations where we outsource our operational functions and delivery processes, as we have less direct visibility and control over the procurement of materials and the employment of workers. Although most of our direct suppliers are Australian businesses, we are aware that their supply chains may extend outside Australian borders, which increases the risk of modern slavery in Tier 2 and beyond of our supply chain.

The services we procure that are particularly vulnerable to modern slavery include security, cleaning, waste management, and trade works, while the procurement of branded and unbranded goods, carpet, concrete, bathroom materials, timber and lumber, and windows have been identified as high-risk materials for our business. Details of the process undertaken to identify these high-risk goods and services can be found in the following section on page 16.

As we further develop our understanding of and approach to reducing the risks of modern slavery, we will expand our scope beyond our direct suppliers and begin exploring the risks of modern slavery further down our supply chain.

COVID-19 Impacts

COVID-19 has created unprecedented challenges for businesses globally and has disrupted operations in ways that have increased worker's vulnerability and exposure to modern slavery⁹. For Frasers Property, the more frequent need for essential services such as cleaning and security, and the increase in demand of IT equipment and furniture due to working from home arrangements are just a few ways in which our exposure to modern slavery risks in our supply chain has increased as a result of COVID-19. Regardless of these impacts, our values are unchanging, and working towards establishing a responsible supply chain continues to be a priority for our business.

We are also conscious of the adverse impacts that our suppliers continue to face as they adapt to the ever-changing effects of this global pandemic. Frasers Property will continue to support our suppliers during this difficult time and ensure that together, we continue to address the risks of modern slavery.

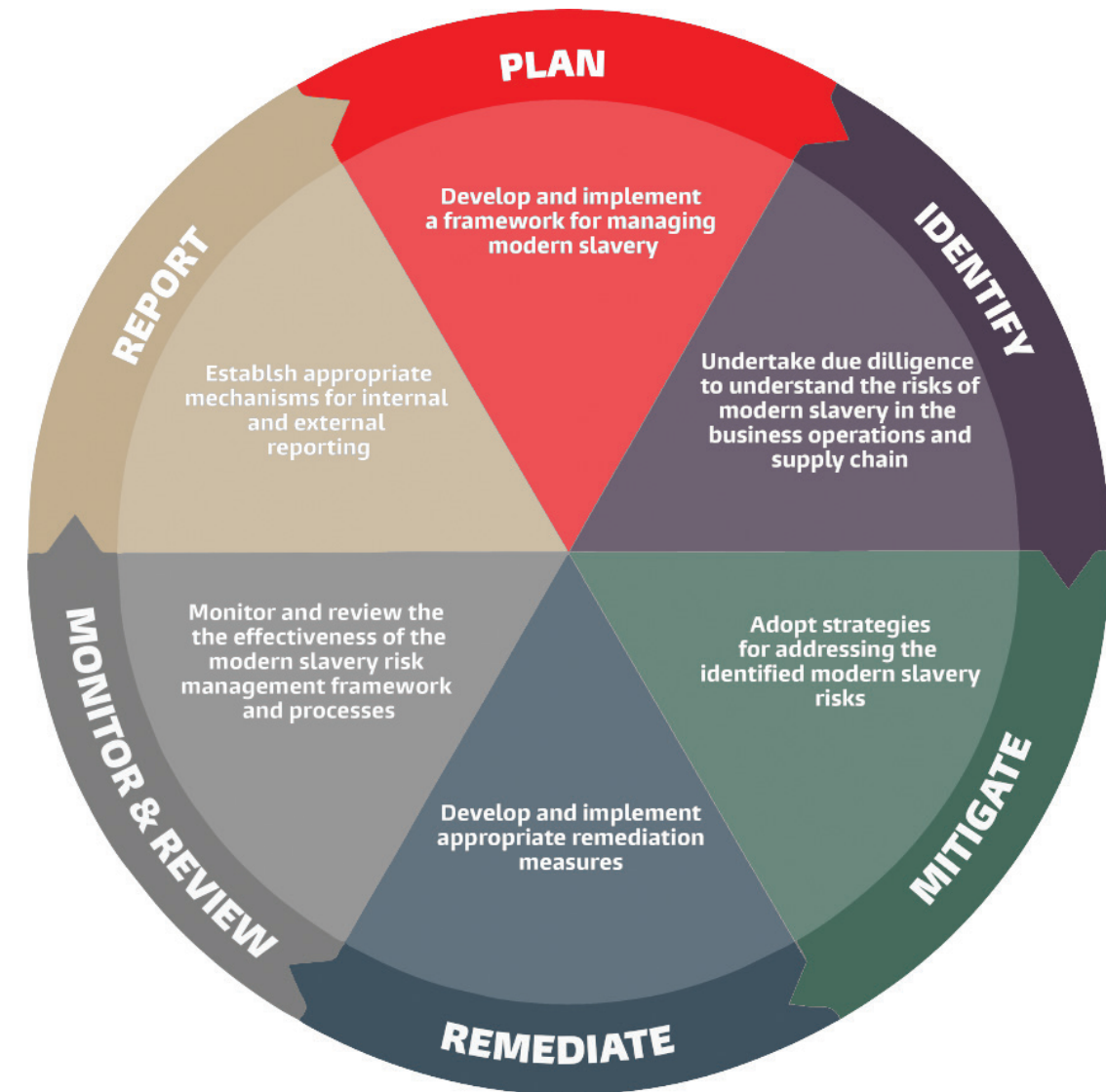
9. Australian Border Force (2020). MODERN SLAVERY ACT INFORMATION SHEET: CORONAVIRUS. [online] Available at: <https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-covid-19.pdf>.



MANAGING OUR RISKS

Our approach to managing modern slavery risks follows a robust methodology for identifying, mitigating, and remediating modern slavery risks, and assessing the effectiveness of these actions. This approach, which has been informed by our engagement with industry experts in 2018 and best practice management, is reflected below in our Modern Slavery Risk Management Framework.

Frasers Property's Modern Slavery Risk Management Framework



Plan

To support our approach to managing modern slavery risks at Frasers Property, we have a comprehensive set of policies and procedures that articulate our values, ways of working and expectations of employees and suppliers. These documents ensure that our employees and suppliers clearly understand our expectations, commitments, and processes.

The newest addition to this set of documents is our [Responsible Sourcing Policy](#), which was published in March 2021. This policy clearly stipulates our commitment to producing goods and services responsibly, as well as our expectations of suppliers. In FY22, we will also be revising our Modern Slavery Risk Procedure, which details our approach to managing modern slavery risks.

MANAGING OUR RISKS

Our policies and procedures as relevant to human rights and modern slavery

Policy or Procedure	Purpose
Anti-Bribery Policy	Sets out the policies and procedures that have been put in place to prevent the occurrence of bribery and corruption. Frasers Property has a zero-tolerance approach to bribery and corruption.
Code of Business Conduct	Provides clear guidelines on ethics and relationships, thereby safeguarding the reputation and interests of Frasers Property and our stakeholders and governing the conduct of every employee.
Corporate Social Responsibility Policy	Reflects our commitment to create places where resources are reused, recycled, and restored, and where new ideas are fostered to support people and the planet, and initiatives are taken to help people lead better, healthier lives.
Grievance & Dispute Resolution Policy	Stipulates how employees may raise and discuss work-related matters of concern with a view to resolving issues as quickly as possible.
Guide to Making a Disclosure	Explains how employees or officers of Frasers Property can make a report under the Whistle-blower Policy. This Guide should be read in conjunction with the Whistle-blower Policy.
HSE Incident Management	Defines the minimum requirements for responding, reporting, investigating, and managing Health, Safety and Environment (HSE) incidents.
HSE Risk Management	Defines the minimum requirements for the effective and consistent identification, assessment, control and review of HSE hazards and risks.
Modern Slavery Risk Procedure	Sets out our approach to identifying and managing modern slavery risks in relation to our direct procurement of all goods and services.
Responsible Sourcing Policy	Communicates Frasers Property's commitment to procuring goods and services responsibly and our expectations of suppliers in this regard.
Risk Management Policy	Seeks to identify, assess, monitor, and manage risks across the organisation. Frasers Property will ensure that risk management is an integral part of our decision-making process and will use risk management to take advantage of potential opportunities while managing potential adverse effects.
Whistle-blower Policy	Details the framework for receiving, investigating, and addressing allegations of criminal, dishonest or unethical behaviour where that behaviour concerns the activities of Frasers Property or current and former directors, officers, agents, employees and contractors of Frasers Property.

MANAGING OUR RISKS

Identify

In 2016, as part of the sustainability commitments outlined in our *A Different Way* strategy, Frasers Property conducted an assessment and mapping exercise of our supply chain to better understand key risks and opportunities, and to identify how best to work with our suppliers to manage environmental and safety hazards. Through this exercise we identified three modern slavery practices that pose the greatest risk to our supply chain: forced labour, debt bondage, and deceptive recruiting for labour, and key recommendations to work towards reducing these risks.

High risk modern slavery practices

Forced labour

Restrictions of movement, intimidation, threats, including human trafficking.

Debt Bondage

The payment of excessive recruitment fees or associated costs, and retention of identity documents.

Deceptive recruiting for labour

Workers falsely promised certain jobs, benefits or conditions.

In 2018, Frasers Property engaged an industry expert to design an approach to implement these recommendations. The objective of this project was to establish a responsible sourcing commitment, integrate responsible sourcing considerations into procurement, and to use this process to increase awareness and capacity amongst key stakeholders, including employees and suppliers.

Over the course of the engagement, key stakeholders across Frasers Property were consulted at multiple stages. This included interviews with ten internal stakeholders across six different divisions in the business, the facilitation of a policy commitment workshop and a supplier management model validation workshop, as well as a project review meeting.

As part of this work, a risk assessment of the products and services that we procure through our direct suppliers was undertaken, in which ten product and service categories were identified as high risk based on extent of environmental impact, reputational risk to Frasers Property, and known labour risk factors.

MANAGING OUR RISKS

High risk goods and services categories

Category	Definition
Branded & unbranded goods not for resale	Includes branded and unbranded goods used for promotional and internal purposes, such as: pens, hats, notepads etc.
Carpet	Includes all carpet textile floor covering procured by Frasers Property teams.
Cleaning services	All contractors, direct employees and labour hire companies employed to provide cleaning services in Frasers Property's properties.
Concrete	Includes concrete sundries, HD bolts, concrete works, premixed concrete supply.
Speciality / trade works	Contractors hired by Frasers Property's principal contractors to complete smaller trades work. Also, smaller companies directly contracted by Frasers Property to complete works.
Bathroom materials	Products installed in bathrooms including taps, vanities, toilet suites, baths, shower heads and kitchen appliances.
Security services	All contractors, direct employees and labour hire companies employed to provide security services (e.g., guards, camera installation, monitoring).
Timber / lumber	Timber boards used for flooring in Frasers Property's properties.
Waste management	Includes waste bins, waste removal, transport services, waste processing (e.g., recycling / organic waste).
Windows	Includes window frames and glass as well as installation services procured by teams for Frasers Property's properties, including through a principal contractor.

MANAGING OUR RISKS

The outcomes of this assessment provided the foundation for our supplier management process. Frasers Property has adopted a risk-based approach to supplier management, in which we gradually engage with our Tier 1 suppliers based on their level of risk. We have categorised our direct suppliers into four categories of risk that are defined by annual spend and vendor type.

Frasers Property's supplier management categories

	Category 1	Category 2	Category 3	Category 4
Scope	High risk, high spend	High risk, low spend	Low risk, high spend	Low risk, low spend
Annual Spend (AUD)	>\$5 million	<\$5 million	>\$5 million	<\$5 million
Vendor Type	Built form construction/ maintenance contracts, cleaning, security, IT electronics, marketing goods, catering, landscape maintenance, labour hire, waste removal, fit-out contractors		Civil construction contracts, all remaining vendor types	All remaining Vendor types

In FY20, Frasers Property, as a member of the Property Council of Australia's (PCA) Modern Slavery Working Group, collaborated with industry peers and experts to develop a Modern Slavery Supplier Assessment. The assessment provides a mechanism for businesses to engage with their suppliers to identify and assess the risks of modern slavery within their operations and supply chains.

Of the 57 questions within the assessment, 18 have been identified as posing a higher risk of modern slavery, as determined by the PCA Modern Slavery Working Group and Frasers Property's internal risk team. The responses to those questions that indicate a higher risk are set out in the tables on the following pages.

MANAGING OUR RISKS

High risk assessment responses

Number	Question	Response
1	Does your organisation manufacture products overseas or maintain operations overseas that contribute to the delivery of your products or services?	Yes
2	Does your organisation source (via your supply chain) manufactured products or services from overseas that contribute to the delivery of your products or services?	Yes
3	In the last 10 years has your organisation been involved in any incidents, proceedings or does it have a record relating to bribery, corruption, fraud, money-laundering or other prohibited business practices?	Yes
4	Is your organisation currently involved in criminal proceedings or has it been involved in criminal proceedings during the last 10 years?	Yes
5	Do key stakeholders within your organisation understand the basic facts around the issue of 'Modern Slavery', with a general awareness of where modern slavery may exist in your Australian and/or international supply chains?	Not yet; or Not sure
6	Does your organisation provide any training to current employees or suppliers around the topic of human rights and modern slavery?	No; or No, but we plan to do so within the next 12 months
7	Are all new employees provided information and training on your organisation's human rights policies or expectations around modern slavery?	No; or No, but we plan to do so within the next 12 months
8	Is your organisation a reportable entity under either the Commonwealth or NSW Modern Slavery legislation or that of another jurisdiction?	No, we are not required to report on modern slavery
9	Has your organisation assessed the risks relating to modern slavery in its operations and supply chains?	No, we have not assessed the modern slavery risk in our operation and supply chain; or No, but we plan to do so within the next 12 months; or Other
10	Do you have established policies in place that cover the following issues: Human rights or modern slavery	No

MANAGING OUR RISKS

Number	Question	Response
11	Thinking about your suppliers, how well does your organisation know its supply chains and have you taken any steps to map or review your suppliers?	We haven't done anything yet
12	Does your organisation have a grievance mechanism or process in place that provides an opportunity for employees, suppliers and the 'voice of the worker' to be heard?	No, we do not have plans to develop a formal grievance mechanism in the future; or No, but we are developing one within the next 12 months for i) employees ii) suppliers
13	Do employees of your organisation have the right to join or form trade unions of their own choosing, and to bargain collectively, without prior authorisation from your management according to national law?	No
14	Does your organisation have sufficient internal resources and capabilities to develop a remediation process, or implement a process for remediation once established, in the event that a human rights incident or modern slavery is discovered in your supply chain or operations?	No, we do not currently have sufficient resources and capabilities; or No, but we plan to establish sufficient resources within the next 12 months
15	Has your organisation ever been identified by your own staff or a third party as having instances of modern slavery in your operations or supply chains?	Yes; or Not sure
16	Does your organisation outsource some of or all your recruitment and labour hire, or do you conduct all your recruiting directly?	Our workers pay fees to agents to gain employment; and/or We have a long chain of labour recruiters; and/or We recruit through an agency or labour provider; and/or Other
17	Does your organisation provide every worker at all sites and facilities with written and understandable information about their employment conditions, including wages, hours and holidays, before they enter into employment?	No; or No, but we plan to do so within the next 12 months
18	Does your organisation or your labour hire provider recruit any employees or workers from overseas, such as temporary or casual migrant workers?	Yes; or Not sure

MANAGING OUR RISKS

Following a pilot supplier assessment of 40 direct suppliers in FY20, we engaged with all our Category 1 suppliers (total 14) and a selection of our Category 2, 3 and 4 suppliers in FY21. Of the 70 suppliers engaged in FY21, 91% completed the Modern Slavery Supplier Assessment within FY21, with another 8% submitting it after the financial year deadline. Of the 69 suppliers that have completed the assessment, the number of higher risk responses ranged from one to ten, with an average of five. The questions with the greatest number of higher risk responses were question two and seven, while no higher risk responses were received for question four (refer to the tables on the previous pages).

To ensure responses provided by suppliers are accurate, a verification of supplier assessments by [Bureau Veritas](#) is available to PCA Modern Slavery Working Group members upon request. This financial year, six of our suppliers were verified, with the aim to increase this to all Category 1 suppliers in FY22.

In the coming financial year, we will expand our engagement by requesting all Category 2 suppliers to complete the assessment, with the intention to extend this further on a category-per-year basis. All suppliers engaged since FY21 will be required to resubmit the assessment on an annual basis to ensure its ongoing relevance.

Mitigate

To mitigate the higher risks identified in the Modern Slavery Supplier Assessment, Frasers Property put together a Corrective Action Plan to assist suppliers in addressing modern slavery risks in their operations and supply chains.

If a supplier submitted one or more high risk responses in the Modern Slavery Supplier Assessment, we issued them a Corrective Action Plan that specified what that high-risk response was and how they can go about reducing the associated risk. Recommendations ranged from the delivery of modern slavery training to the development of relevant policies and procedures.

To ensure action is taken, Frasers Property requested all suppliers that had completed the assessment and received a Corrective Action Plan to provide us with an Implementation Plan by 1 December 2021. This Implementation Plan needed to describe the steps that have been taken and/or will be taken over the 12 months following the completion of the assessment to mitigate the areas of high risk identified in the Corrective Action Plan. We received a response from over 70% of suppliers by the set timeframe, and we are continuing to support the remaining suppliers with the development of their Implementation Plan. Progress towards reducing the identified high risks will be re-assessed during the next annual Modern Slavery Supplier Assessment.

We are conscious that some of the actions prescribed in the Corrective Action Plan may not be the best approach for all our suppliers, so we encouraged them to explore different ways of mitigating these risks that are tailored to the needs of their business.

Our aim is to build capacity within our supply chain to reduce the risk of modern slavery, particularly in the areas flagged as high risk in the assessment. While we do not enforce the implementation of specific actions, we do expect, at a minimum, that our suppliers engage with us to work towards reducing their risks. If it is evident that no progress is being made, through both a lack of engagement with Frasers Property and a lack of improvement in the Modern Slavery Supplier Assessment, Frasers Property will reconsider its engagement with suppliers that do not operate in accordance with our values.

We are also aware that modern slavery is often hidden deep within supply chains, so we will assess and address the risks of modern slavery in our Tier 2, Tier 3, and Tier 4 suppliers once we have established processes in place for our direct suppliers.

MANAGING OUR RISKS

Remediate

Frasers Property is committed to the highest standards of conduct and ethical behaviour in all its business activities, and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance, and good corporate governance.

We have in place several mechanisms for employees and third parties to make complaints or to report suspected or actual illegal activity or breaches. This includes our Whistle-blower Policy, Guide to Making a Disclosure, and Grievance & Dispute Resolution Policy.

The Whistle-blower Policy and associated Guide to Making a Disclosure details our framework for receiving, investigating, and addressing allegations of criminal, dishonest or unethical behaviour where that behaviour concerns the activities of Frasers Property or current and former directors, officers, agents, employees, and contractors. The documents are publicly available on our website for any whistle-blower to make a report through several available channels, including our Independent Whistle-blower Hotline. Each whistle-blower disclosure received is investigated and reported to the respective Executive Management Team.

Our Grievance & Dispute Resolution Policy stipulates how employees may raise and discuss work-related matters of concern with a view to resolving issues as quickly as possible. Employees must first raise their grievance with their immediate manager or supervisor, who will investigate the grievance on an impartial basis and agree an appropriate course of action with the employee to remedy the situation. All grievances are dealt with in strict confidence and can be escalated to the appropriate level of authority if the issue remains unresolved. Frasers Property's external grievance procedure also aims to ensure all grievances are managed in a systematic, fair, timely and transparent manner.

In the coming years, we plan to review and where necessary update our policies and procedures to ensure that they remain effective and relevant to the needs of our employees and suppliers. For the upcoming financial year, we will be focusing on reviewing and updating our HSE Incident Management and HSE Risk Management procedures to include modern slavery.

MANAGING OUR RISKS

Monitor & Review

We endeavour to continuously improve our approach to managing our modern slavery risks and to embed any lessons learnt into our existing process. As is essential for continuous growth and learning, Frasers Property has established a suite of mechanisms to assess the effectiveness of the actions that have been implemented to-date under the Modern Slavery Risk Management Framework. We are assessing effectiveness in relation to suppliers engaged in FY21, which includes all Category 1 suppliers, in addition to a selection of Category 2, 3 and 4 suppliers identified for early engagement. In FY22, we will expand these assessment mechanisms to cover actions that we plan to implement during the financial year.

Mechanisms to assess effectiveness

Action	Assessment Mechanism	Effectiveness
Existing Policies and Procedures	Third-party review and update of our existing policies and procedures.	Undertaken in 2018 – to take place again in FY23
Responsible Sourcing Policy	Review policy every two years or at any other times considered appropriate by the Executive Management Teams or CEOs of Frasers Property.	Policy review due March 2023 at the latest
Modern Slavery Supplier Assessment	Percentage of engaged suppliers who have completed the Modern Slavery Supplier Assessment.	91% completed in FY21
Assessment Assurance	Percentage of engaged suppliers who have had their Modern Slavery Supplier Assessment externally verified.	9% verified in FY21
Corrective Action Plan	Percentage of engaged suppliers who have adopted the recommended actions in the Corrective Action Plan.	FY21 supplier progress to be determined in FY22
Implementation Plan	Percentage of engaged suppliers who have reduced at least one of the higher risk responses in their annual Modern Slavery Supplier Assessment.	FY21 supplier progress to be determined in FY22
Whistle-blower Policy	Number of employees who are aware of the Policy.	Refresher communications piece to be sent to all employees in FY22
Effectiveness Assessment	Review and update assessment annually to ensure appropriateness of existing mechanisms and to incorporate additional mechanisms for actions planned in the upcoming financial year.	Review to take place in FY22
Modern Slavery Statement	Third-party review of our annual Statement.	Completed for FY20 Statement

Report

In March 2021, we published our first Modern Slavery Statement in accordance with the *Modern Slavery Act 2018* (Cth), which entered into force on 1 January 2019¹⁰. This Act requires that all Australian and foreign entities carrying business in Australia with at least AUD\$100 million annual consolidated revenue must prepare annual Modern Slavery Statements covering their financial year¹¹.

Not only does this reporting requirement push businesses, like Frasers Property, to contribute to combating modern slavery in global supply chains, but it also holds us accountable for our actions and inactions. Our Statement is the means we have adopted to report internally and externally on our progress and planned actions towards addressing the risks of modern slavery in our operations and supply chains.

NEXT STEPS

Frasers Property has made some important first steps toward addressing modern slavery risks in our operations and supply chains, and we are proud of the progress we have made to-date. However, we are conscious that there is still far more work to be done, and although modern slavery is not an issue that can be solved immediately, there are several actions that we have identified as priorities for the 2022 financial year.

FY22 Priorities

Action	Description
Modern Slavery Statement Review	Collaborate with industry experts through the PCA Modern Slavery Working Group to review our Modern Slavery Statement.
Implementation Plan Collection	Receive all Implementation Plans from our Category 1 suppliers engaged in FY21 to ensure they are taking action to reduce the risks of modern slavery.
Modern Slavery Risk Procedure Revision	Revise and share our Modern Slavery Risk Procedure with key stakeholders in the business.
HSE Risk Management Procedure Updates	Update the HSE Risk Management Procedures to include modern slavery.
Responsible Sourcing Policy Acknowledgment	Request all Category 1 suppliers to acknowledge our Responsible Sourcing Policy, with the intention to expand this to include all suppliers on a category-per-year basis.
Risk Reassessment	Complete a reassessment of our modern slavery risks.
Modern Slavery Pre-qualification Requirements	Include the Modern Slavery Supplier Assessment in the pre-qualification process for all Category 1 and Category 2 contractors.
Contract Update	Include a clause relating to modern slavery in all contracts to ensure that contractors comply with our requirements.
Modern Slavery Supplier Assessment Completion	Request all Category 1 and 2 suppliers to complete the Modern Slavery Supplier Assessment.
Assessment Assurance	Undertake external verification of our Category 1 supplier's Modern Slavery Supplier Assessment to ensure their responses are accurate.
Corrective Action Plan Distribution	Distribute Corrective Action Plans to all Category 1 and 2 suppliers who have completed the Modern Slavery Supplier Assessment.
Modern Slavery Internal Training	Develop and deliver mandatory modern slavery training to all Frasers Property employees to build awareness and capacity in our business. Training for suppliers and specific employees to be developed in FY23.
Internal and External Collaboration	Continue to collaborate with Frasers Property stakeholders, the PCA Modern Slavery Working Group, and other industry experts to share learnings and build capabilities.

10. The Department of Home Affairs (2022). Modern slavery. [online] [www.homeaffairs.gov.au](https://www.homeaffairs.gov.au/criminal-justice/Pages/modern-slavery.aspx#:~:text=The%20Commonwealth%20Modern%20Slavery%20Act.). Available at: <https://www.homeaffairs.gov.au/criminal-justice/Pages/modern-slavery.aspx#:~:text=The%20Commonwealth%20Modern%20Slavery%20Act.>

11. The Department of Home Affairs (2019). Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities. [online] Available at: <https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf>.



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Cover Image:
Horsley Drive Business Park,
NSW

March 2022