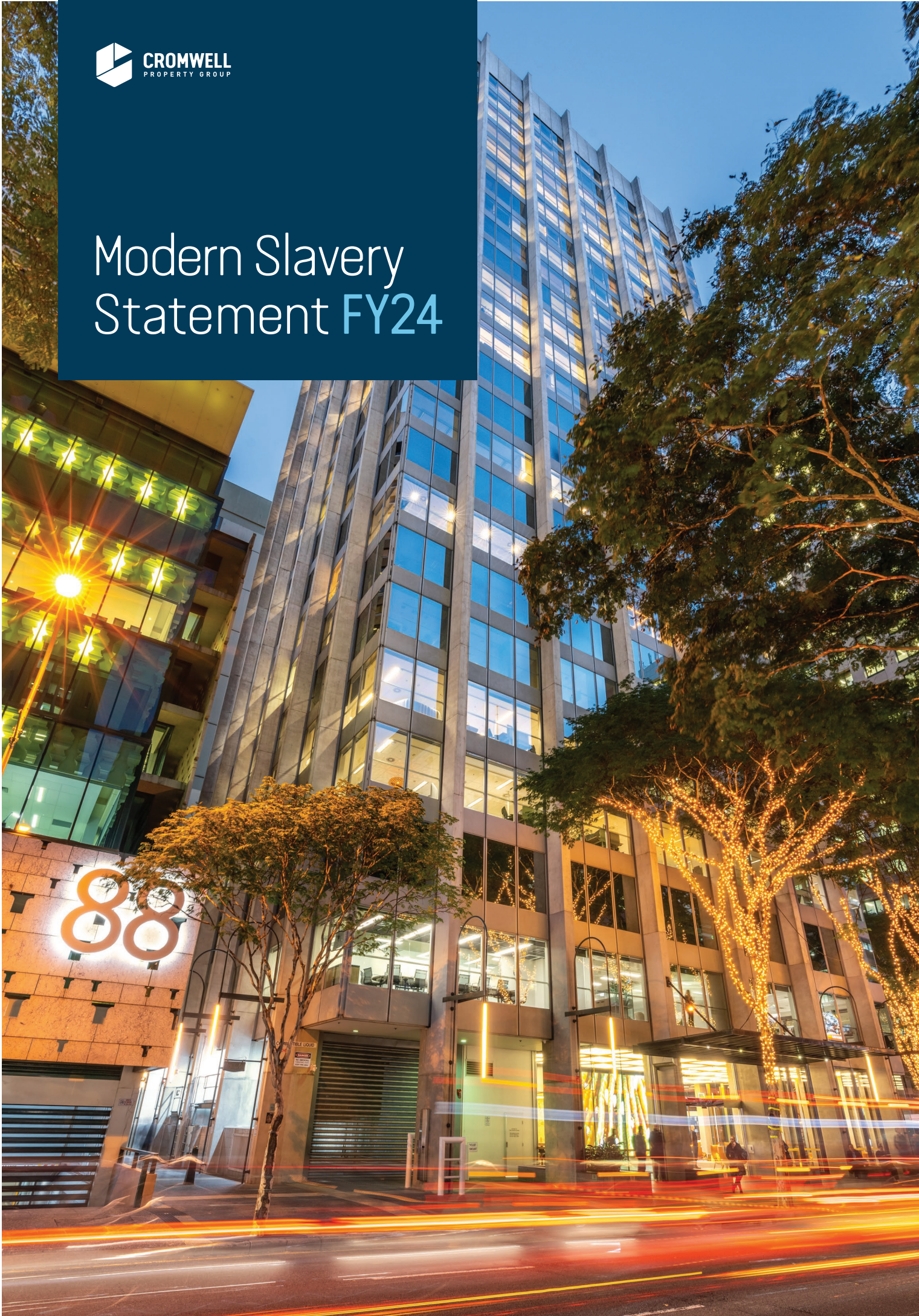




# Modern Slavery Statement FY24





This image and cover - 100 Creek Street, Brisbane

Cromwell Property Group acknowledges and pays respects to past and present Traditional Custodians and Elders of Australia. We respect the cultural, spiritual, and educational practices of Aboriginal and Torres Strait Islander peoples.

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# Modern Slavery Statement FY24

This is a joint Modern Slavery Statement ("Statement") made under the Modern Slavery Act 2018 (Cth)(AU) issued by:

**CROMWELL PROPERTY GROUP**

Consisting of

**CROMWELL CORPORATION LIMITED**  
ABN 44 001 056 980 ("CCL")

and

**CROMWELL DIVERSIFIED PROPERTY TRUST**  
ARSN 102 982 598

the responsible entity of which is  
**Cromwell Property Securities Limited**  
ABN 11 079 147 809

For the Reporting Period starting on  
1 July 2023 and ending 30 June 2024



## A message from our CEO

Cromwell Property Group recognises that the ability to identify and remediate instances of modern slavery in our supply chains is an essential part of its corporate accountability. With an estimated 50 million people worldwide considered to be captive in situations of modern slavery, this global issue is one we consider daily throughout our business.

This is our fifth Modern Slavery Statement, and we have seen an evolution in the sector of not only reporting, but actions and industry-wide efforts to work together to develop our grievance mechanisms and responses. Whilst we have not yet identified any instances of modern slavery in any of our supply chains, we recognise that continued effort is required to build our ongoing capability to identify human rights violations.

Cromwell Property Group remains committed to identifying, assessing, managing, and mitigating modern slavery risk in our operations and supply chains, and this statement outlines our progress during the period from 1 July 2023 to 30 June 2024.

**Jonathan Callaghan**  
Managing Director & Chief Executive Officer  
Cromwell Property Group

Date: 20 December 2024

# About this Statement

Cromwell Property Group (the “Group” or “Cromwell”) opposes modern slavery practices and, consistent with our values, is committed to identifying and managing the risk of modern slavery occurring throughout our supply chains and operations.

The Modern Slavery Act 2018 (Cth)[AU] requires Australian entities with a minimum annual consolidated revenue of AUD\$100 million who carry on business in Australia to publish an annual modern slavery statement.

The Statement describes our approach to identifying, assessing, mitigating and responding to the risk of modern slavery in our supply chains and operations for the financial year commencing 1 July 2023 and ending 30 June 2024 (FY24 or Reporting Period). All data and figures quoted in this Statement are current as at 30 June 2024, unless stated otherwise.

ESG related disclosures, policies, and previous statements are also available for download from the [Group website](#). It includes the mandatory reporting criteria specified in Section 16 of the Act, as referenced below.



545 Queen Street, Brisbane

## Australian Modern Slavery Act Mandatory Reporting Criteria

	Section	Page
Identify the reporting entity	<b>About this Statement</b>	<b>4</b>
Describe the structure, operations and supply chains of the reporting entity	<b>About Cromwell Property Group</b>	<b>5</b>
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	<b>Identifying, assessing and addressing modern slavery risk</b>	<b>7</b>
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	<b>Identifying, assessing and addressing modern slavery risk</b>	<b>7</b>
Describe how the reporting entity assesses the effectiveness of such actions	<b>Assessing our response to modern slavery risk</b>	<b>17</b>
Describe the process of consultation with: <ul style="list-style-type: none"> <li>Any entities that the reporting entity owns or controls</li> <li>In the case of a reporting entity covered by a statement under section 14 – the entity giving the statement</li> </ul>	<b>Statement approval</b>	<b>19</b>
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	<b>Letter from CEO</b>	<b>3</b>
	<b>About this Statement</b>	<b>4</b>
	<b>Further information</b>	<b>19</b>

# About Cromwell Property Group

## Our structure

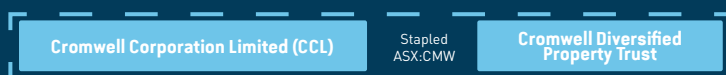
This description reflects Cromwell's structure at 30 June 2024. Further comprehensive information about the Group, including detailed financial statements, is available in our most recent annual report on the [Cromwell website](#). On 23 May 2024, Cromwell announced the agreement to sell its European Funds Management Platform and interests; the completion of the sale is still pending at the date of this Statement.

The Group is a real estate investor and funds manager, with operations on three continents (as shown in Figure 1) with a global investor base.

Our business comprises a number of corporate entities as shown in our structure below. CCL is the ultimate parent company of the Group, which includes CEHL which is a wholly-owned subsidiary of CCL and responsible for business operations across Europe.

CCL has a board of directors responsible for directing and controlling the Group's activities, with a number of separate subsidiary corporate entities in the Group having their own board of directors, including CEHL. The responsibility for Cromwell's day to day operation and administration is delegated to the Group's Executive Management Team.

Figure 1: Cromwell's structure



### Operations



### Investment activities

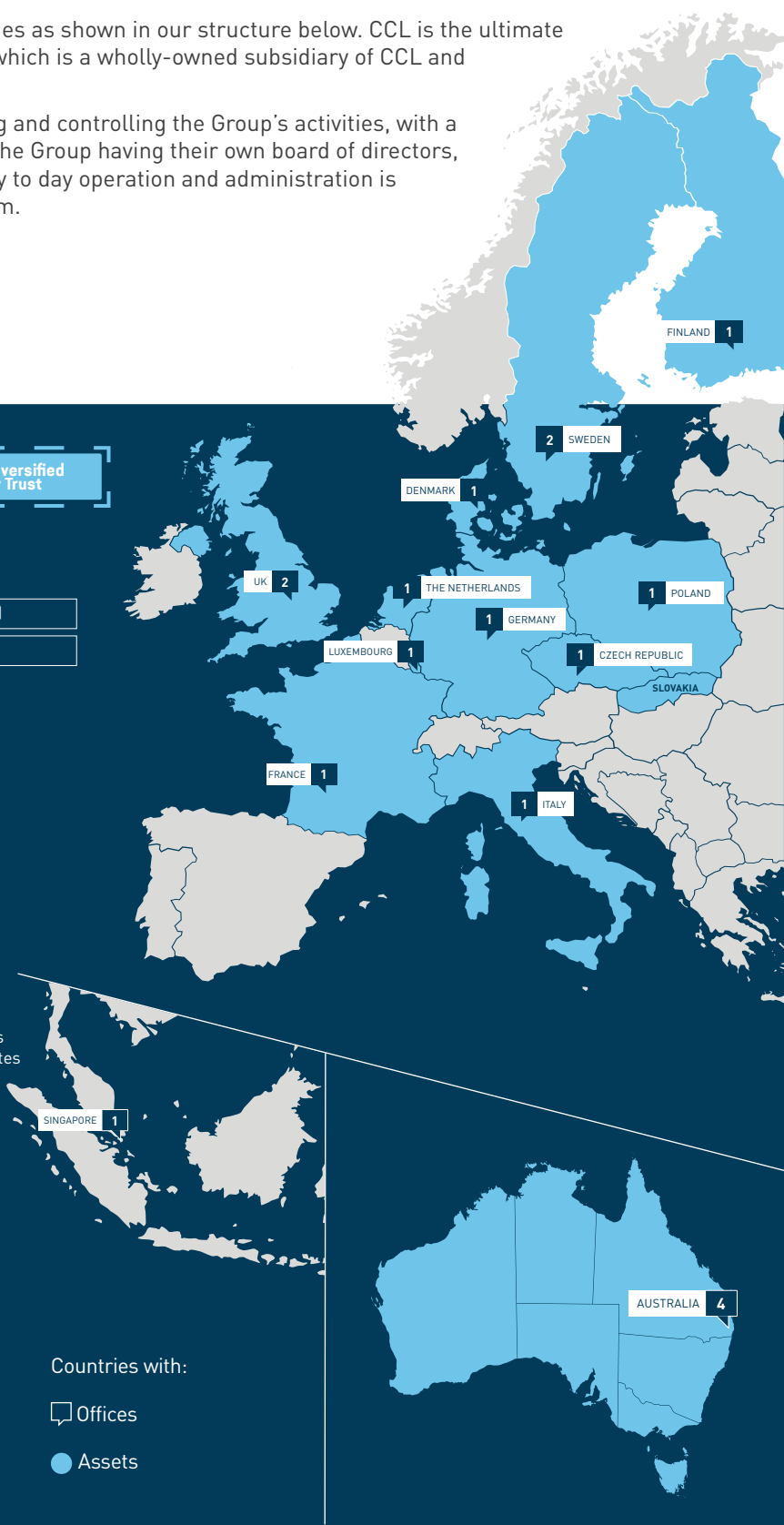
- Oyster Property Group (50%)
- Phoenix Portfolios (45%)

### Services

- Asset Management
- Project Management
- Leasing
- Funds Management
- Legal and Company Secretariat
- Risk and Compliance
- Tax and Structuring
- Accounting and Reporting
- Investor Relations
- Transactional Services

### Products

- Wholesale Funds
- Joint Ventures Retail Funds
- Asset Management Mandates



### Key

- Reporting Entities - Modern Slavery Act 2018 (Cth) (AU)
- AU Operations
- Overseas Operations
- Mandatory Reporting - Modern Slavery Act 2015 (UK)
- Investment activities - Non managed or non operated joint ventures and investment (included as operations)

Countries with:

- Offices
- Assets

## Our operations

Our global operations include developing and managing real estate products, overseeing our investors' interests, managing third party funds, mandates and co-investments through our asset management business, and providing property management services to our clients' assets in Australia, Europe and Singapore. In Australia, we also manage funds and investments for retail and wholesale investors.

The Group's activities span a total of over 200 properties and over 2,000 tenant customers as shown in Figure 2. Our fund and asset management businesses across the Group manage AU\$8.3 billion worth of assets for third parties, comprising AU\$5.9 billion in Europe and AU\$2.4 billion in Australia and New Zealand. Our investment portfolio value is over AU\$2.4 billion.

As at June 2024, Cromwell employed approximately 326 employees across 15 countries in 19 office locations to perform our operations. Primarily, this relates to engaging a workforce to provide and support us in providing investment, asset and property management activities for our clients and investors.

## Our supply chains

Our supply chains include suppliers to corporate, investment and real estate operations across the Group and covers the supply of products and services (including third-party labour) to our own corporate operations and to our clients' assets. Our supply chains extend beyond direct suppliers and include products and services sourced domestically or overseas.

Figure 2: Operational summary

### Investment portfolio

As at 30 June 2024

PORTFOLIO VALUE<sup>1</sup>

**\$2.4 billion**

PROPERTIES

**200**

TENANT-CUSTOMERS

**2,000+**

### Our operations

EMPLOYEES

**326**

COUNTRIES

**15**

OFFICES

**19**

### Fund and asset management

As at 30 June 2024

TOTAL THIRD-PARTY AUM

**\$8.3 billion**

EUROPE AUM

**\$5.9 billion**

AUSTRALIA/NEW ZEALAND AUM

**\$2.4 billion**

# Identifying, assessing & addressing modern slavery risk

## FY24 approach to modern slavery risk

Cromwell understands our operations have the potential to cause, contribute or be directly linked to modern slavery. We acknowledge the role and responsibility we have in generating awareness and implementing steps to uphold human rights and minimise the risk of modern slavery practices occurring in our operations and supply chains.

In FY24, we continued with our overall global approach to modern slavery and supply chain management which was informed by the Group's broader risk management framework and the risk appetite set by the Group's board.

Our approach to modern slavery risk is to:

1. Identify and assess the risk of modern slavery in our operations and supply chains;
2. Prioritise higher risk activities where we have the opportunity to implement change and make a difference;
3. Educate our employees and suppliers on their own responsibilities in order to drive positive outcomes;
4. Collaborate with our peers to progressively promote awareness throughout our industry; and
5. Continuously improve our internal capabilities to respond to modern slavery risks.

Our corporate values are integral to our business and our approach to modern slavery:

# our values.



we are  
**accountable.**

We do what we say we will do and deliver outstanding performance

We aim to exceed all standards and have the courage to do what is right

We act with integrity always



we are  
**progressive.**

We challenge ourselves to embrace new perspectives and drive change

We focus on creating value and seek out new possibilities

We provide creative solutions and continuously improve together



we are  
**collaborative.**

We respect and support each other, valuing the work others do

We partner across teams and borders with our investors and other stakeholders

We share ideas and encourage each other to perform at our best

## Identifying modern slavery risk

Under the United Nations' Guiding Principles on Business and Human Rights and the UN "Protect, Respect and Remedy" Framework we applied the continuum of involvement in the UNGPs as set out in Figure 3 to aid in the high-level identification of the different ways we may be at risk of potentially being involved in modern slavery. If any modern slavery risks were reported to the business, we would anticipate using the following methods to identify and mitigate the risks perceived:

**Figure 3: Continuum of involvement**

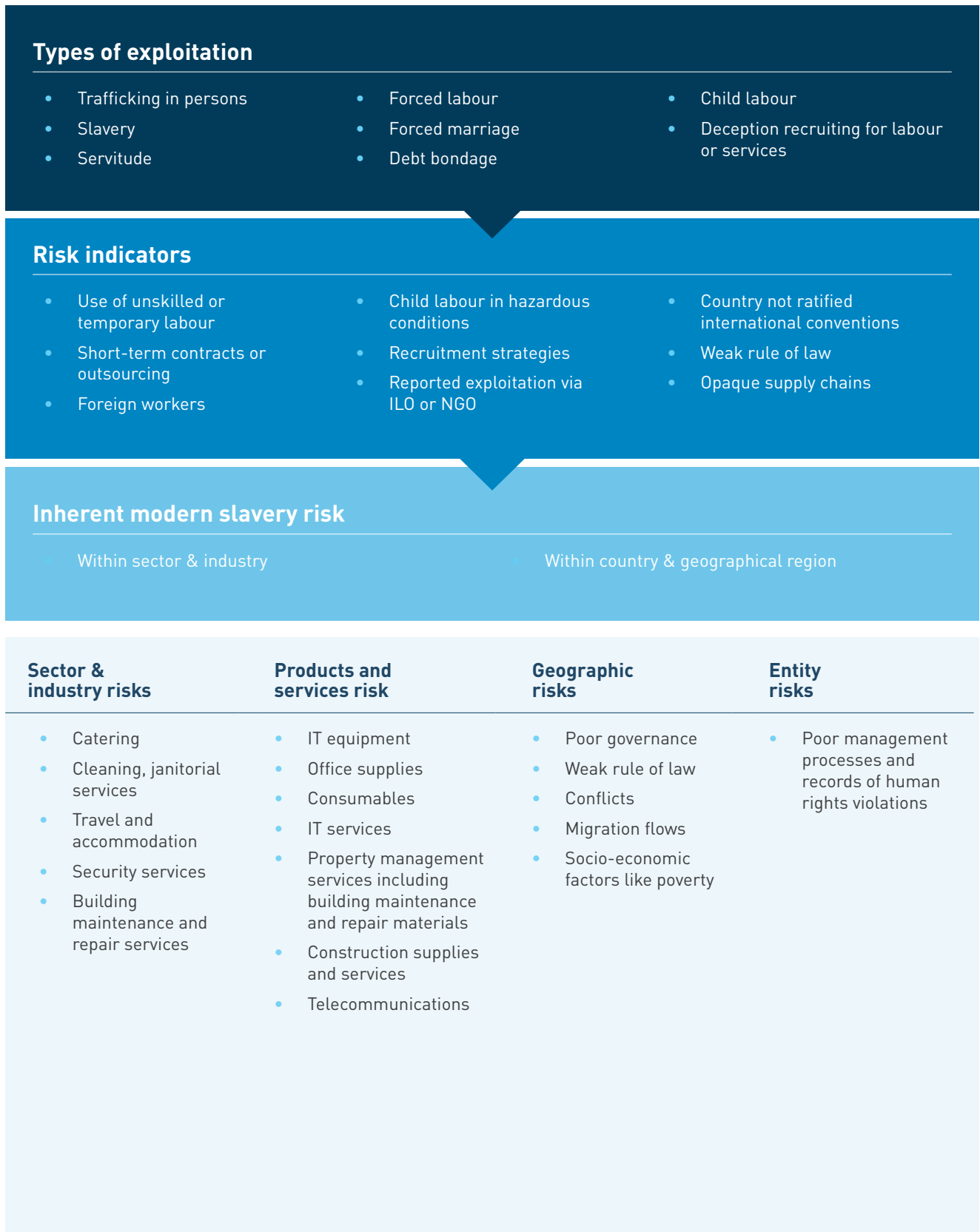
Cause	Contribute	Directly Linked
<p><b>Cromwell's own actions could potentially result in modern slavery practices occurring.</b></p> <p>If and/or when we identify an instance, we would take immediate steps to prevent the impact and provide assistance including outlining access to grievance mechanisms. Further investigation would be required to ensure the occurrence is not more widespread and whether Cromwell directly contributed to the cause of the adverse human rights impact.</p>	<p><b>Cromwell could potentially contribute to modern slavery (where our actions are so significant that the abuse would be unlikely without them).</b></p> <p>e.g.: within the construction sector, acquiring certain materials that are known to be linked to the use of forced labour e.g, solar panels.</p> <p>If and/or when we identify an instance of adverse human rights in our supply chain, a business decision would be required as to whether to continue with that source of material/supplier, and if so, work with them to address the cause for a positive outcome. Mitigation to the impact of the identified instance may be required. Cromwell would work with affected individuals to remedy their position where appropriate, ensuring that we contribute to a successful outcome.</p>	<p><b>Cromwell could be directly linked to modern slavery through our products, services or operations.</b></p> <p>e.g.: outsourced professional services who in turn outsource the professional work to countries where there are adverse human rights practices.</p> <p>If and/or when we identify an instance of adverse human rights in our supply chain that is directly linked through a business relationship, Cromwell would use its influence to impact the outcome of the identified instance. Cromwell would analyse and assess the situation, and work toward a positive outcome for the impacted parties.</p>



## Risk Indicators

The risk indicators used to assist assessing potential modern slavery risks in Figure 4. These indicators are consistent with the indicators we have previously identified and have used in prior years.

**Figure 4**



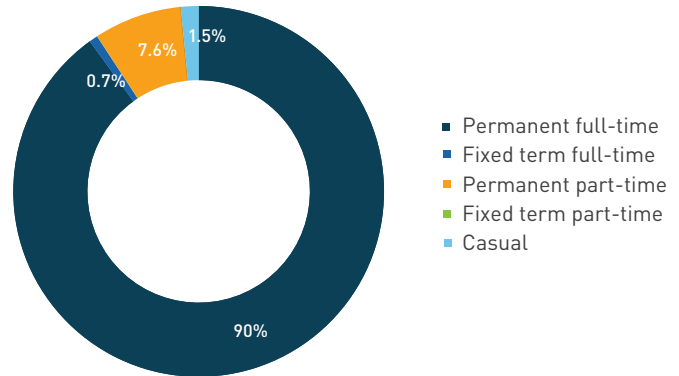
# Our employees

Cromwell is focused on maintaining high standards of human rights in the workplace. Our approach is to build an inclusive, safe and respectful culture in which employees have a voice.

We annually survey our people to understand their level of engagement and receive their feedback on a range of topics including health & safety, wellbeing, inclusion and diversity. Both the Code of Conduct and the Recruitment and Selection Policy set the standard which all employees are expected to adhere to. Figure 5 provides a breakdown of Cromwell’s workforce, as at 30 June 2024.

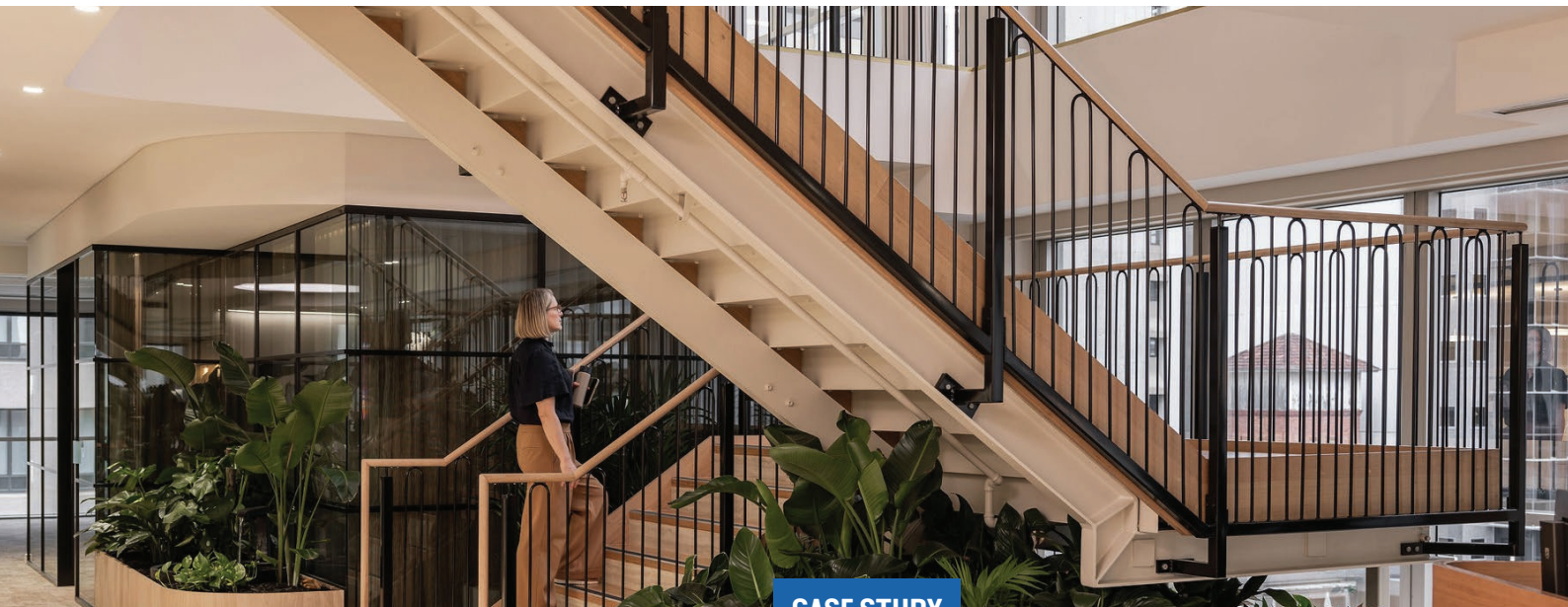
**Figure 5: Cromwell Workforce Composition**

Employment Type	Number	% of total Workforce
Permanent full-time	117	90%
Fixed term full-time	1	0.7%
Permanent part-time	10	7.6%
Fixed term part-time	0	0
Casual	2	1.5%



Within our corporate operations, we recognise the existence of “People Risks” along with modern slavery risks, when recruiting and managing staff. To address these risks, Cromwell has controls and due diligence activities both in the recruitment process and ongoing employment of staff, including:

People Risks	FY24 Status
<b>Recruitment Services</b>	<ul style="list-style-type: none"> <li>Maintaining exclusive partnerships with reputable recruiters</li> <li>Seeking to include an acknowledgement of Cromwell’s Supplier Code of Conduct before engaging with any external recruiter</li> <li>Ensuring all candidates can interpret the terms and conditions of their employment</li> <li>Conducting all necessary searches to ensure personnel are legally entitled to work</li> </ul>
<b>Temporary or unskilled labour</b>	<ul style="list-style-type: none"> <li>Temporary staff are appointed directly through agencies</li> <li>Fixed term contract staff are considered for permanent positions where appropriate</li> </ul>
<b>Training &amp; Awareness</b>	<ul style="list-style-type: none"> <li>All new staff receive modern slavery awareness training as part of the induction process</li> <li>All new staff receive information relating to our whistleblowing policy as part of the induction process</li> <li>All staff inductions include an overview of the rights and entitlements of staff (received with their contract) and where to obtain further information and support, including access to Cromwell’s Employee Assistance Program.</li> <li>All staff undertake mandatory annual governance refresher training which includes a section on Modern Slavery.</li> </ul>
<b>Remediation and Grievance</b>	<ul style="list-style-type: none"> <li>While the risk of modern slavery within Cromwell’s operations is low, remediation (if required) would be addressed through relevant policies</li> <li>This includes formal investigations in accordance with the Whistleblower Protection Policy and formal assessment, investigation and rectification of matters reported under our Enterprise Risk Management Framework</li> <li>Cromwell will continue to follow best practice recommendations for both remediation processes and grievance mechanisms</li> <li>Reporting tools have been developed and are available to all staff to make reporting easy.</li> </ul>



## CASE STUDY

### Creek Street Fit Out

In FY24, after its planned fit out works were completed, Cromwell relocated its Head Office to 100 Creek Street, Brisbane, levels 10 and 11. The goal of the fit out was to create a sustainable, socially responsible workplace. The new space was conceptualised with the theme “Cromwell Lifestyle” to encourage office attendance and enhance the employee and visitor experience. The design was guided by Cromwell’s brand and culture, and the final result delivered a harmonious workspace environment that accommodates the diverse needs of its modern workforce.

To support the local economy and reduce the potential environmental impacts of this work, we partnered with local businesses for the fit out, and with community artisans for the furniture and artwork. Natural materials create a warm and inviting atmosphere for both staff and visitors, while biophilic design encourages a strong connection to nature with native species planted throughout the space. To minimise the environmental impact of the project Cromwell focused on the reuse of existing and second-hand furniture, sustainably sourced carpets, fabrics and laminates. Ethical sourcing of materials and labour was central to this project.

The shared spaces and private work zones feature native plants, indigenous art and a soft colour palette, and aim to promote community, enhance wellbeing and provide integrated learning experiences for employees. To ensure employee wellbeing, wellness spaces were created.

This fit out demonstrates our commitment to ethical and sustainable business practices. We will continue to monitor and improve sustainability practices, support local businesses, and advocate for ESG principles in all operations.



Breakout area



Level 10 Kitchen



Level 11 Library



## Our supply chains

In FY24 we took a refreshed approach to the assessment of our tier 1 suppliers by reviewing internally and focussing on the sector and industry risk indicators as outlined in Figure 4.

Our analysis involved the interaction of several factors that operate to identify the risks of modern slavery within business operations and supply chains including:

1. Total suppliers spend amount
2. Sector and Industry risk categories

The following Figure 6 shows the breakdown of risk ratings identified by spend, the threshold spend was set at a level which Cromwell considered to be a relevant factor in the risk - based assessment of suppliers.

We also undertook a deep dive into the due diligence of our materially outsourced providers in the Funds Management business, developing questions to include corporate social governance and ESG issues. We expanded on our annual vendor due diligence questionnaire to include all of the following topics:

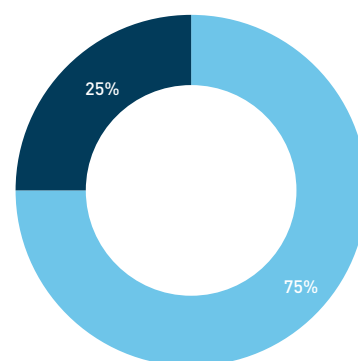
1. More in depth information about the company, ownership and management
2. Legal and Regulatory Compliance
3. Workers Dialogue
4. Employee or Workers from Overseas
5. Education, Training and Partnerships
6. Sub-contracting and Third-Party Recruitment
7. Current ESG Approach
8. Performance and Remediation
9. Data Protection and Security

### Jurisdictional Risk

For most of the reporting period Cromwell's largest estimated jurisdictional risk continued to lie in its investments in Poland. These assets were disposed of in May 2024 which has subsequently shifted the jurisdictional risk to the identified suppliers in India, Italy, China and Australia.

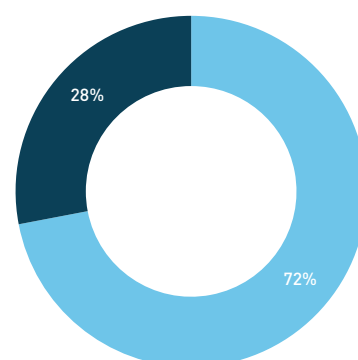
**Figure 6: Risk by spend**

#### High spend



■ Low risk ■ High risk

#### Low spend



■ Low risk ■ High risk



Energex House, Newstead

**CASE STUDY**

## Solar Panels

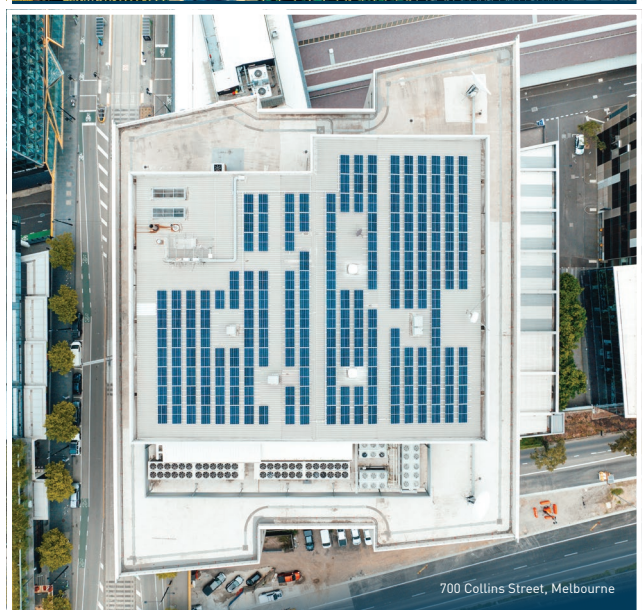
As part of our ambitious net zero target for scope 1, 2, and 3 by 2045, our asset decarbonisation plans included 'solar system installation' projects which saw on-site solar panels installed in a number of our properties during FY24. Solar Panels are often sourced from overseas, and produced at low cost, all of which can elevate the risk of human rights violations and modern slavery in our supply chain. To mitigate this risk, our Project Services team identified and sourced a sole Australian based supplier, who specialises in large solar EPC projects.

Before starting the engagement with the company, Cromwell's Project Services team conducted supplier due diligence, which included questions about the supplier's procurement and their approach to modern slavery. They provided a warranty that they do not, and covenant that they will not, engage in any form of modern slavery. As part of the due diligence process, they provided an internal policy on Ethical Sourcing and Modern Slavery which sets out their obligations in this area. These obligations are also imposed on their suppliers. Additionally, they undertake ongoing site inspections on their supplier based in China, and Factory Assessment Reports are also available.

**Please see the [FY24 ESG Report](#) for further information.**



400 George Street, Brisbane



700 Collins Street, Melbourne

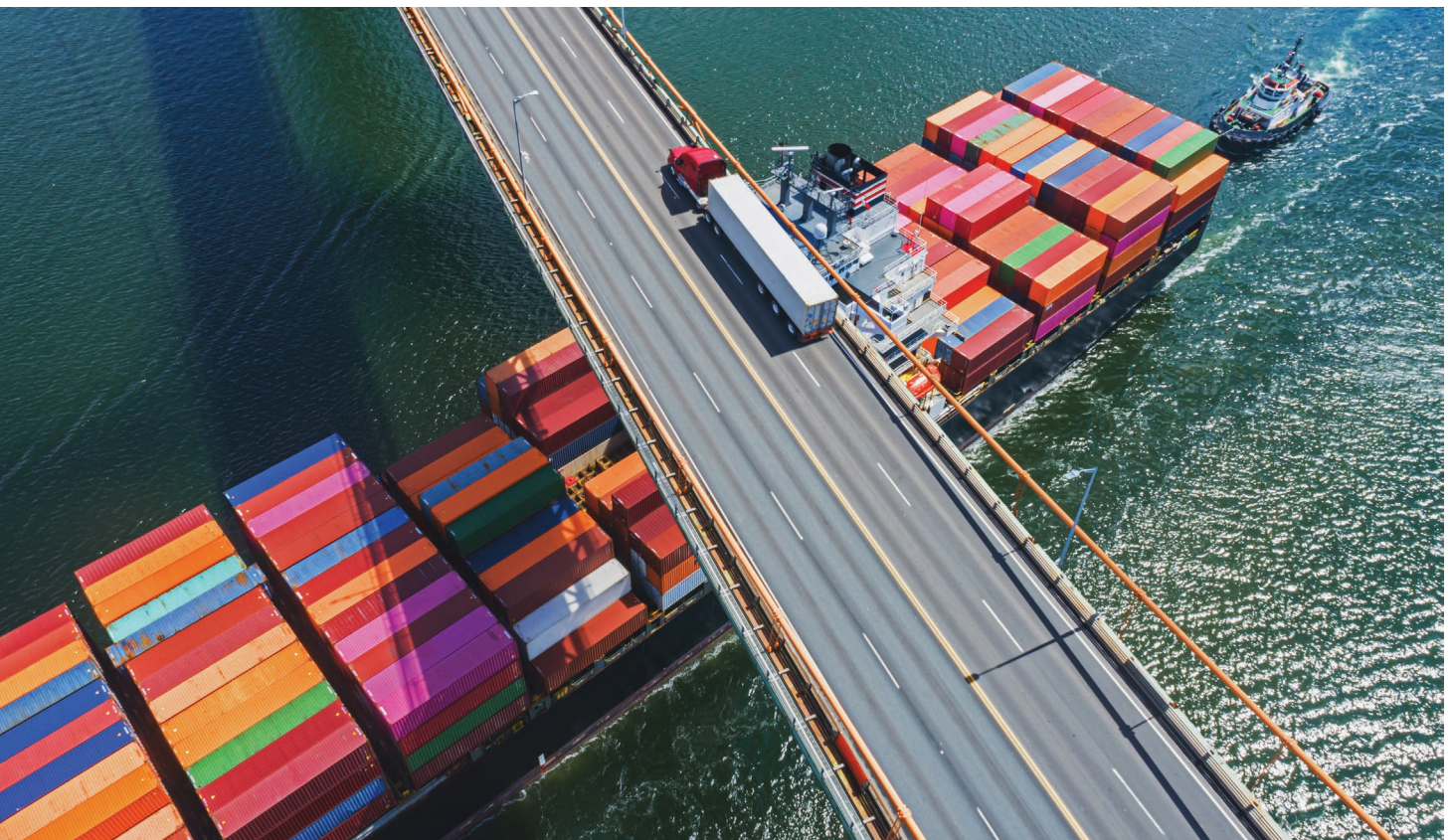
## Mitigating modern slavery risk

Mitigating modern slavery risk is an ongoing priority and we continue to look for ways to develop tools to identify any potential modern slavery risk in our supply chains, and to assist our suppliers further down in our shared supply chains.

For the Reporting Period our toolbox included –

1. Informed365 platform
2. Participation in the Property Council of Australia's (PCA's) Human Rights and Modern Slavery Working Group.
3. Due Diligence questionnaire
4. Cm3 pre-qualification and onboarding
5. Sanction checks
6. Property visits
7. Training resources

We used the results of the supplier questionnaire data to inform the activities and plan we are developing to ensure an appropriate, risk-based approach to modern slavery risk in the future (refer section on [Assessing our response to modern slavery risk](#)).



## Cromwell Key Policies

Our policy and governance framework includes provisions to include modern slavery risk identification, mitigation and response mechanisms as part of our overall risk management measures and encourage conduct and standards that align with our corporate values. These include:

Policy/Procedure	Overview
<b>Enterprise Risk Management Policy and Framework</b>	Our Enterprise Risk Management Policy and Framework sets out the approach Cromwell takes to enterprise risk management.
<b>Code of Conduct</b>	Our Code of Conduct sets forth certain minimum standards of behaviours and business conduct that we expect of all employees and workers. It also encourages employees to speak up and either report any breach anonymously or to contact the People & Culture department if they are concerned that the relevant Code may not have been followed.
<b>Supplier Code of Conduct</b>	The Supplier Code of Conduct sets out Cromwell's expectations of suppliers to comply with relevant laws including but not limited to those governing consumer protection, environment, social, anti-competition, human rights, modern slavery and health, safety and welfare laws. Our Supplier Code of Conduct outlines the expectations we hold of our suppliers. This ensures that appropriate governance relating to the inclusion or absence of adequate contractual obligations is recorded. In Australia, all new vendors must acknowledge receipt of the Supplier Code of Conduct before appointment. This document is available in a number of languages to ensure accessibility by suppliers and their employees.
<b>Group Procurement Policy</b>	The Group Procurement Policy specifies the requirements of suppliers and expectations of staff in investigating, mitigating and managing the risks of modern slavery in our supply chain. The Group Procurement Policy is based on the principles included in the international standard in Sustainable Procurement (ISO20400) and provides the framework to manage the due diligence, onboarding and performance of suppliers and associated remediation plans necessitated following evaluation of suppliers.
<b>Diversity, Equity &amp; Inclusion Policy</b>	Our Diversity, Equity and Inclusion Policy outlines Cromwell's commitment to creating an equitable workplace where diversity is valued and promoted.
<b>Group ESG Policy</b>	Our Environmental, Social and Governance (ESG) Policy reflects a general framework for Cromwell's approach and commitments to key ESG issues, risks and opportunities within our organisation, and regarding Cromwell's impact externally.
<b>Health, Safety and Wellbeing Policy</b>	Our Health, Safety and Wellbeing Policy outlines the commitment and expectations Cromwell has to ensure safety and protection of health and welfare of people.
<b>Whistleblower Protection Policy</b>	Our Whistleblower Protection Policy sets out information relating to the Whistleblower Protection Scheme, including the types of disclosures that qualify for protection; protections available to whistleblowers; and who (and how) disclosures can be made.



## Remediation Process

Cromwell's Enterprise Risk Management Framework outlines a governance structure to support identifying, assessing, mitigating and responding to the wide variety of risk types we are faced with when pursuing our business goals. It recognises the need for transparent and accessible grievance mechanisms which support stakeholders.

For issues concerning potential instances of modern slavery, our remediation responses to identified issues must be:

- Based on engagement, dialogue, and mediation
- Legitimate, accessible, and easy to understand
- Safe and predictable
- Equitable and transparent
- Rights-compatible and focused on continuous improvement.

Cromwell's Head of Risk and Compliance is the escalation point for internal teams and external stakeholders, including suppliers, who have become aware of potential occurrences of modern slavery practices within our supply chains or operations.

### **If an issue is identified, we will follow this process -**

1. Potential issue identified.
2. Issue escalated to Head of Risk and Compliance.
3. Engagement with internal teams and external stakeholders which may include NGOs, regulators, government agencies and/or suppliers as are relevant to the issue at hand.
4. Where modern slavery practices are confirmed, the relevant stakeholders work with the Head of Risk and Compliance to establish an appropriate remedial action plan, guided by the UN Guiding Principles.
5. The nature and severity of the issue, and practices identified, will impact the approach taken.
6. Affected suppliers and stakeholders work through the appropriate remedial actions.
7. Grievance mechanisms are reviewed after the issue is assessed for effectiveness.
8. Subsequent follow up to ensure issue has not reoccurred.

As our knowledge of modern slavery risk in our supply chains and operations grows year on year, the range and approach to responding to potential modern slavery practices also grows. This assists Cromwell's people in advising on what is an appropriate, fit for purpose response to an issue. Our knowledge base in these areas is also supplemented by our increasing recognition of the specific challenges that may be faced by indigenous peoples, women, national or ethnic minorities, religious, and linguistic minorities, children, persons with disabilities and migrant workers.



# Assessing our response to modern slavery risk

We have not identified nor had any instances of actual or potential modern slavery practices being brought to our attention requiring our response during the Reporting Period.

Even though we have not yet had to respond to an issue, the steps we have taken to increase our knowledge and awareness of this area of risk, as well as ensuring that risks, when identified, are underpinned by our risk management framework and strong risk governance, will ensure that we have a fit for purpose response that is appropriate to a range of potentially delicate and sensitive scenarios.

Our previous statements have outlined the ongoing progress we have made year on year against focus areas that have evolved alongside our increasing awareness and learnings. As a business we will continue to review and develop our procedures, policies and processes to mitigate the risk of modern slavery in line with the changing landscape, industry collaboration and better knowledge of our supply chain and operations.

Cromwell remains committed to understanding its supply chains, taking proactive steps to identify, assess and mitigate any potential issues or risks of modern slavery in our operations and supply chains, along with meeting our corporate responsibilities as a sustainable property fund and asset manager. Items such as supplier engagement, participation rates in training and staff feedback will continue to be factors that are assessed when determining Cromwell's risk to modern slavery, and the effectiveness of our response to instances of modern slavery when it is identified.

**We engage with the relevant stakeholders through various means, including:**

## **1. Suppliers**

- Onboarding due diligence
- Regular meetings
- Regular communications
- Contract renewal discussions
- Cm3

## **2. Investors**

- Quarterly Updates
- Insight Magazine
- Annual General Meeting
- Monthly flyers
- Ad hoc updates

## **3. Employees**

- Onboarding program including initial training
- Annual governance refresher training
- CEO Updates
- Town halls
- Management committees and forums

## **4. Board Committee and Board**

- Regular meetings
- Executive and management reporting
- Committee engagement



## Industry Involvement & Collaboration – Property Council of Australia

In Australia, Cromwell continued to actively participate in the Property Council of Australia’s (PCA’s) Human Rights and Modern Slavery Working Group (“Working Group”). Our Head of Risk and Compliance is a Co-Chair of this group.

The Working Group met monthly through 2023/2024 to collaborate and discuss how Australia’s property and construction sector can assess and address modern slavery risks. Monthly meetings had an agreed agenda distributed in advance, with regular guest speakers and subject matter experts providing insights. From 1 July 2023, the original Working Group established in 2018 split into two collaboration groups; the Property Council ‘Human Rights and Modern Slavery Working Group’, collaborating around industry leadership and strategic direction, and the Informed 365 Property Supplier Platform Working Group, for property and construction organisations using the Informed 365 technology platform to assess and address modern slavery risks in supply chains.

### Key topics discussed during 2023/2024

- Collaboration to achieve together what cannot easily be achieved separately
- Continuous improvement
- Due diligence
- Grievance mechanisms
- Indicators of vulnerability
- Just Transition and renewable energy value chains
- Legislation and changes to reporting requirements
- Modern slavery education and awareness
- Remediation
- Risks of harm to people through modern slavery
- Supply chain engagement, auditing and verification

The Working Group is a key source of information, regulatory input, knowledge sharing and addressing approaches to common industry issues. It also is a valuable way of building industry and our own people’s capacity and knowledge. The Working Group provides access to up-to-date new resources and material, listing of events and updates on legislation.

# Approval of Statement

This is Cromwell's Modern Slavery Statement for FY2024 and is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth). The Statement has been approved by the Board of Directors of Cromwell Property Group.

The consultation process included engagement with the relevant members of the senior management across Cromwell Property Group and its reporting entities, the Chief Executive Officer, and the Head of Risk and Compliance.



**Jonathan Callaghan**  
Managing Director & Chief Executive Officer  
Cromwell Property Group

## Further information

The Cromwell website provides a comprehensive range of information on the Group, sustainability framework and governance practices: [www.cromwellpropertygroup.com](http://www.cromwellpropertygroup.com).

Requests for further information and our approach to modern slavery risk, may be directed to:

### Head of Risk and Compliance

Cromwell Property Group  
GPO Box 1093  
Brisbane QLD 4001 Australia

☎ +61 7 3225 7777

✉ [riskandcompliance@cromwell.com.au](mailto:riskandcompliance@cromwell.com.au)

### Company Secretary

Cromwell Property Group  
GPO Box 1093  
Brisbane QLD 4001 Australia

☎ +61 7 3225 7777

✉ [company.secretary@cromwell.com.au](mailto:company.secretary@cromwell.com.au)

