

20
22

Modern Slavery Statement



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About this statement

This is Investa's third Modern Slavery Statement (Statement) to address the requirements of the Australian Modern Slavery Act 2018 (Cth) (Act). The reporting period covered by this Statement is 1 July 2021 to 30 June 2022.

Investa Office Management Holdings Pty Limited and its subsidiaries (together, Investa) is a specialist manager of real estate in Australia, operating an integrated end-to-end management platform incorporating funds management, asset management, property and facilities management services.

This Statement is made by Investa Commercial Property Fund (ICPF) as a reporting entity. The Statement is prepared by Investa Office Management Holdings Pty Ltd (IOMHL), who manages various Investa managed entities, including:

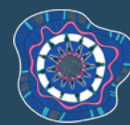
- Investa Commercial Property Fund (ICPF); and
- Australian Office Funds Investment Trust (known as Investa Gateway Offices (IGO))

The policies, processes and actions described in the 2022 Statement apply across Investa's corporate structure.

The Board of IOMHL has approved this Statement since IOMHL is the head entity of the Investa management platform that has responsibility for the management of the properties, operations and developments on behalf of the Investa funds, and since the management platform operates under the same policies and shares the commitment to responsible business practices.

Acknowledgement of Country

Investa acknowledges the Traditional Owners of the lands on which our business operates and where we come together to work. We acknowledge the continuing connection to land, waterways and culture. We pay our respects to Elders past, present and emerging.



Chief Executive Officer's message

This year's Modern Slavery Statement demonstrates how we are driving the future of real estate and creating shared value through innovative, tailored solutions for today and tomorrow, through our responsible investment approach.

Central to our strategy is the transformation of real estate through ESG, creating a resilient business which includes responsible supply chain practices. It is in partnership with our suppliers and wider industry that we can better understand the impacts of modern slavery and how we can seek to address these impacts in our day-to-day practices.

This year, through our ongoing commitment to the United Nations Guiding Principles (UNPGs) on Business and Human Rights, we have extended our due diligence and remediation practices, further embedding respect for human rights into our operational practices.

During the reporting year we built our understanding of modern slavery hot spot risks, identified in 2021, and engaged with more suppliers to better understand their approach to addressing modern slavery in our supply chain. As we undertook high value procurement processes, in hot spot supplier categories, we implemented our revised risk management approach and utilised our engagement to provide ongoing improvement to our operations and developments.

This engagement has informed our high value tender practices in both the reporting year and those programmed for the coming year, including how we can make information and remediation processes more accessible to vulnerable workers in our operations and how we can better understand the worker voice.

Our Transform Tomorrow sustainability strategy recognises that our employees are our key change agents and to support their actions we launched our Sustainability Leaders Series, which includes industry leaders in addressing modern slavery, speaking with our employees nationally.

Further educational modules on modern slavery will be included in the Investa Sustainability School, to launch in late 2022. Investa became a Fellow of the Sustainability Supply Chain School, to provide our employees a platform for our Sustainability School and enable our suppliers to access a range of learning resources, including addressing modern slavery.

We also continued our collaboration with the property industry modern slavery initiatives and the ongoing improvements and education of our industry that these initiatives afford our business and that of our supply chain.

As our platform grows, we extend these practices to new and emerging sectors and investments on behalf of and in consultation with our asset owners.

We remain committed to addressing modern slavery in our supply chain and continued improvement and development of our governance and procurement processes to better understand practices in our operations and supply chain. Through our Sustainability School and Sustainability Leaders Series, we will continue to build our employee knowledge and risk management practices in relation to modern slavery.



**Chief Executive
Officer's Message**

Peter Menegazzo
Chief Executive Officer,
Investa



Human rights and modern slavery framework highlights

2022 Achievements

- Expanded our supplier engagement across our supply chain onboarding all major development contractors
- Integration of modern slavery practices into national procurement tenders
- Reviewed and formalised our grievance mechanisms
- Developed our remediation approach
- Ongoing employee training in modern slavery, including inclusion in the Sustainability Leaders Series for 2022



Progress against our objectives

Investa's Human Rights and Modern Slavery Working Group has set a range of objectives in the development of its modern slavery approach.

Governance		
Objectives	Status	Progress to date
Development of remediation approach	✓	Remediation approach developed and documented
Review of notification processes	○	Notification process reviewed, and improvements recommended
Integration of clauses across all contracts and national tenders	✓	All standard supplier contracts and tenders have modern slavery clauses and requirements
Procurement		
Objectives	Status	Progress to date
Onboarding Suppliers into Modern Slavery Due Diligence platform	✓	Development/ construction suppliers onboarded Remaining Hot spot suppliers invited to onboard Residual suppliers reviewed and programmed for 2023
Supplier audit for high risk suppliers	○	Selected high risk suppliers to be audited in 2023
Education		
Objectives	Status	Progress to date
Employee training on modern slavery	✓	Employee booster completed
Sustainability Leaders Series on Modern Slavery and module included in Sustainability School	✓	Sustainability Leaders Series October 2022 Sustainability School launch December 2022

✓ Complete

○ Underway

Our structure, operations and supply chain

What we do

We are an unlisted property company, that provides an integrated management approach to our end-to-end funds and property management platform. On behalf of our owners, we manage fund investments in properties across Australia from acquisition and development, through to day-to-day operations and financial management.

Investa is a fund and property manager that develops and manages real estate assets on behalf of our funds, mandates and partnerships.



25

Properties

Investa manage and develop commercial office and residential build to rent buildings in Australian capital cities.



~\$12.1BN

Assets Under Management (AUM)

Investa manage these assets and developments on behalf of our funds and mandates.



6

Buildings in construction

Investa manage the development of office and BTR investments on behalf of our funds and mandates.



547

Tenant customers

Our tenant customers work in our buildings in office and retail environments.



229

Employees

Our Australian based workforce is primarily employed in office-based environments, and engaged in accordance with Australian workplace law.

Our Funds and Entities

Our high-performing funds provide institutional investors at home and offshore with real estate investment opportunities in Australia.

The funds and entities include:

- Investa Property Group (IPG) is a Stapled Security comprised of ICPF Holdings Ltd and Investa Commercial Property (ICPF) Fund.
- Investa Wholesale Funds Management Limited (IWFML) is the responsible entity of Investa Commercial Property Fund.
- Oxford Investa Property Partnership (OIPP), which became Investa Gateway Office (in June 2022) is the owner of a portfolio of high-quality commercial office assets managed by Investa.

- Various wholesale and institutional client entities through which Investa partners with investors to provide bespoke fund and property management services, to meet investment mandates.

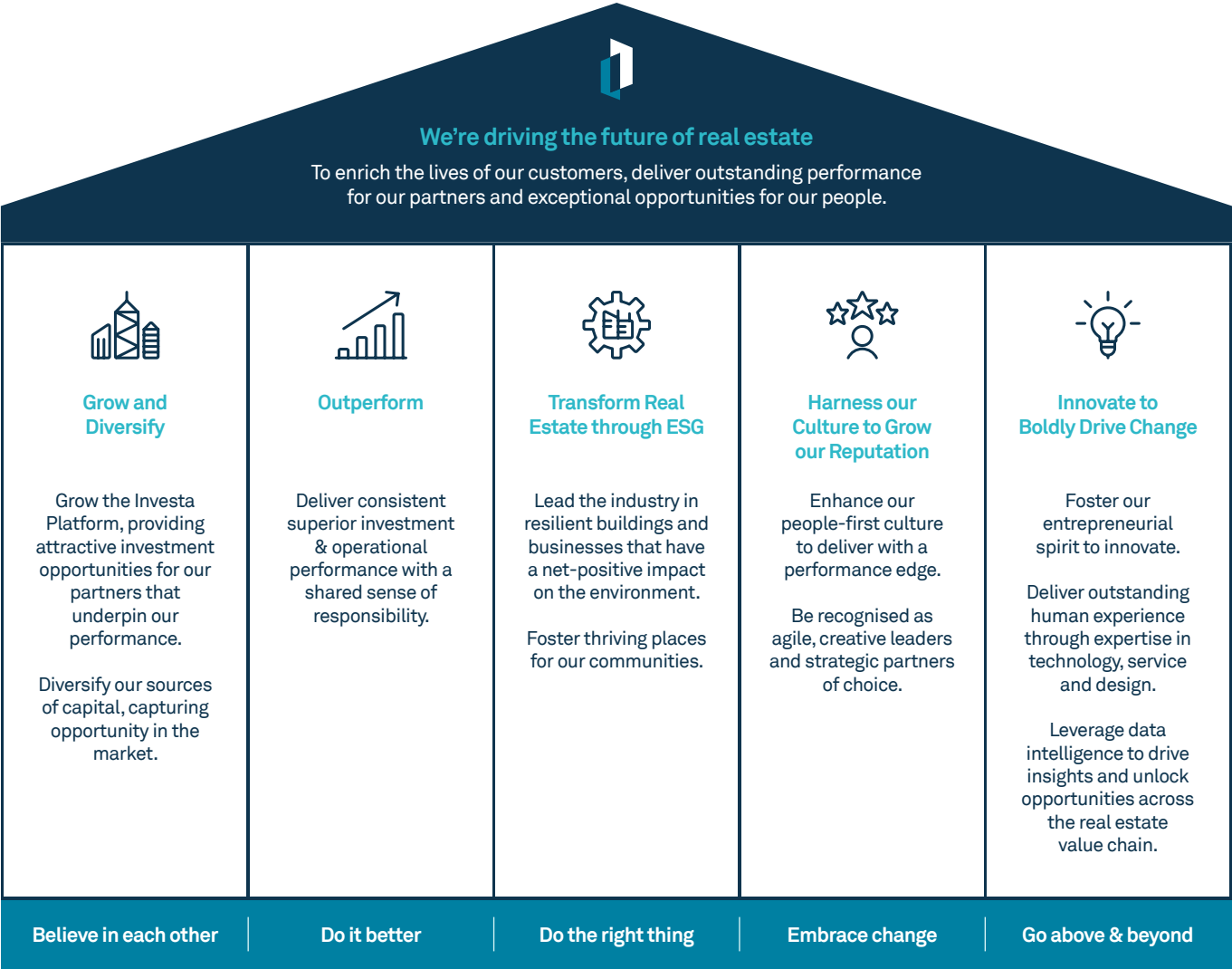
Our funds and entities outsource fund, property and investment management to Investa.



Our Operations

Our business strategy is to drive the future of real estate, creating shared value through innovative, tailored solutions for today and tomorrow. The five pillars of our business strategy align with our values to:

- Believe in each other
- Do it better
- Do the right thing
- Embrace change and
- Go above and beyond





Funds Management

Our high-performing funds, based in Australia, provide institutional and retail investors at home and offshore with real estate investment opportunities across Australia's real estate sector. In the reporting year, our funds and platform have just over \$12.1billion in assets under management.



Real Estate Operations

Our real estate management platform optimises the performance and returns of our assets, as well as the services we provide to our tenants, with consistent reporting, standards and processes. Our platform, operating solely in Australia, provides:

- Research, innovation and data analytics
- Facilities, technical services and procurement of these services and products in our assets and operations
- Project management
- Transaction management services
- Marketing, communications and tenant engagement
- Sustainability, safety and environment
- Development management services

Our management platform procures a range of services to support our building operations, such as property maintenance, cleaning, security, waste services, financial management and professional services



Real Estate Services (RES)

We provide direct property management for our buildings and tenants, in Australia. Our real estate services focus on customer service in property and facilities management, property accounting and leasing, driving the business strategy and operational and financial performance.



Corporate Services and Operations

Investa's corporate services and operations support the business through a range of functions including: legal and compliance, financial services, marketing, communication as well as employee and customer engagement, diversity, inclusion and connection initiatives, supporting the business implementation of our corporate ambitions.



Our Supply Chains

Investa procures a range of services and products to support our business operations and developments.

Investa works with direct (tier one) suppliers that support our business operations, property management and investments. These suppliers then procure services and materials during their contracted agreements.



Funds Management Supply Chain

Services that support funds management include:

- Financial and accounting services
- Professional services



Operations Supply Chain

Services that support building operations include:

- Cleaning services
- Security services
- Waste services
- Property maintenance services and materials
- Building operations services such as lift and building management systems
- Financial and accounting services
- Professional services



Construction Supply Chain

The principal contractor is responsible for procurement of:

- Sub-contractors and labour force to support various construction skills
- Building materials (such as concrete, steel, glass, etc)
- Professional design, engineering and construction services



Corporate Supply Chain

Products and services that support corporate business operations include:

- ICT Equipment (such as computers and telephones)
- Office furniture
- Office supplies / consumables
- Merchandise, apparel and PPE
- Advertising services
- Financial and accounting services
- Professional services



Understanding and assessing our modern slavery risks

Understanding our risks of involvement in modern slavery

The UN Guiding Principles (UNGP) continuum of involvement is used to determine whether we may cause, contribute to or be directly linked to harm, inform our operations and supply chain to identify and assess modern slavery risks, including:

- A company may cause modern slavery if its own acts or omissions directly result in the modern slavery occurring (for example, if it engaged children in hazardous work)
- A company may contribute to modern slavery if its own acts or omissions are significant in facilitating, encouraging or enabling another party to cause a situation of modern slavery (for example, if its purchasing practises put

significant cost and time pressures on suppliers that they could only met through the use of forced labour)

- A company may be directly linked to modern slavery by its operations, products or services through a business relationship (for example, if a product it purchases was manufactured using workers in debt bondage).

The UNGP is recognised in the Investa Human Rights Policy and we understand that modern slavery risks may be present in the operations and supply chains of companies operating in the real estate sector, including Investa.



Our operational modern slavery risks

Direct employees

Investa's 229 employees are directly employed and work in Australia, in primarily office-based environments. All employment terms are set out in their individual contracts and in accordance with Australian workplace law.

All employees are subject to Investa policies and procedures which outline how we work and our expectations for our employees, including:

- Code of Conduct
- Diversity and Inclusion Policy
- Equal Employment Opportunity Policy
- Environment Policy
- Human Rights Policy
- Sustainability Policy
- Whistleblower Policy
- Work Health and Safety Policy

We also communicate our employee expectations in relation to modern slavery through annual e-training modules as well as a Sustainability Leaders Series on modern slavery, where industry and academic experts briefed our whole business on modern slavery risks in the Australian supply chains and specifically in real estate supply chains.

While we consider the risk of modern slavery occurring through our direct operations is low, we recognise that our modern slavery risks are likely to be concentrated in our supply chain.

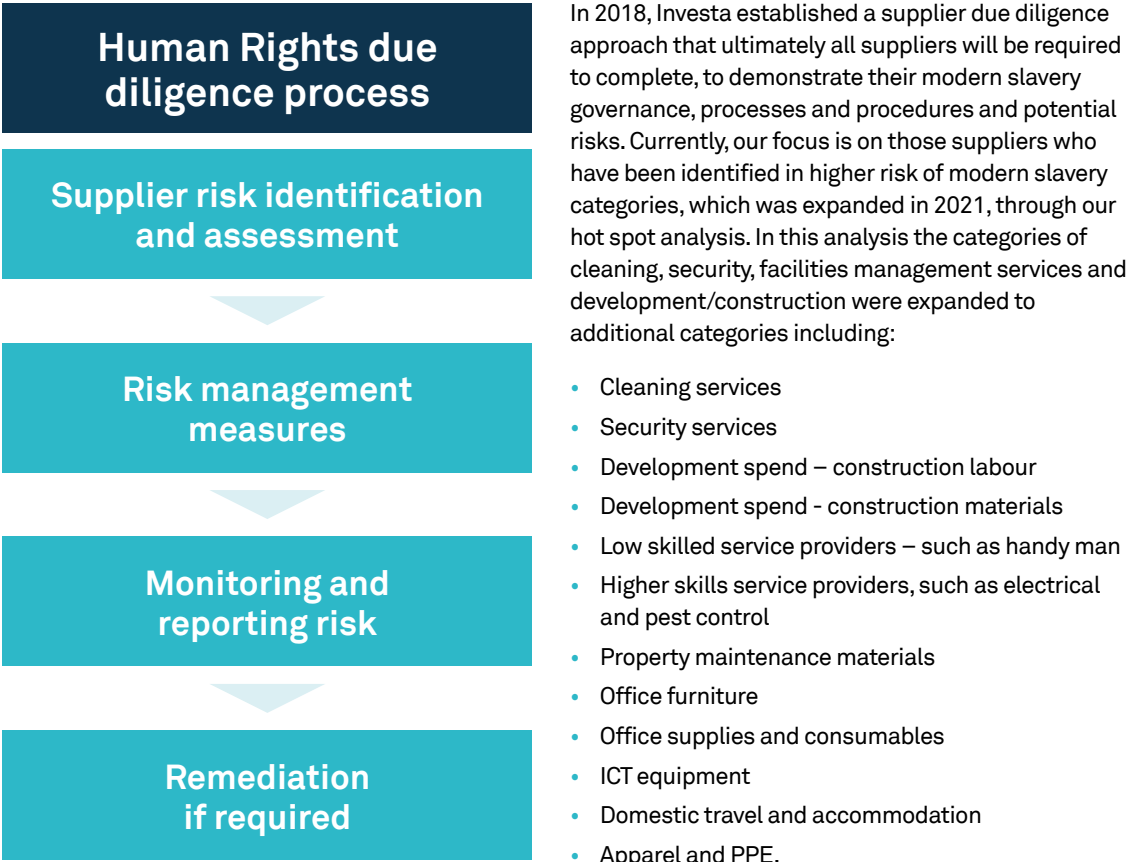
Indirect employees

Investa does indirectly contract some professionals into our workforce to support our business on key projects. These contracts are for professional skilled service providers who provide technical advice on new projects, support flexible work and care arrangements; enable students to gain professional work experience and customer service. Individual employment terms are set out in their individual contracts and in accordance with Australian workplace law.

We acknowledge that labour rights risks may be higher for indirect workers, however the nature of work undertaken, requires a higher educational and professional background and employs workers in less vulnerable groups.



Our supply chain modern slavery risks



The prioritisation in onboarding of suppliers into our modern slavery due diligence processes considered the indicative severity and likelihood of modern slavery hotspots as well as the levels of influence we have in spend. Investa is seeking to include all suppliers into this process, which is being integrated into our supplier standards and onboarding processes.

To date we have 110 suppliers engaged in our ongoing assessments of modern slavery risks. Of those suppliers that have completed the assessment:

- 35% have undertaken a modern slavery risk assessment on their supply chain and operations
- 27% have an understanding of modern slavery risks in their supply chain operations and plan to undertake risk assessments

In terms of supplier practices, some key characteristics identified from our ongoing due diligence assessment include:

- 86% do not manufacture products overseas or maintain foreign operations that contribute to delivery of services to Investa
- 62% of suppliers have a supply chain that source products or services from overseas that contribute to products in our supply chain
- 41% directly recruit, select and hire all workers
- 27% utilise a labour hire agency for their workers
- 21% have contracts of employment in place with workers.

Managing risks and improving our processes

Investa engages with our suppliers to understand their supply chain practices.

During the reporting year, we undertook a Security Tender, inviting security contractors to tender for onsite security services, in our managed office buildings. This process, integrated our modern slavery practices into our existing ethical work practice requirements, which include financial position, company regulatory compliance and employee industrial relations record, labour standards policies and management, standard award requirements, diversity, alignment with Investa's values and supply chain management.

In introducing modern slavery expectations, we required tenderers to have completed our modern slavery due diligence survey on the Informed365 platform and provide their Company Modern Slavery Statement, which were reviewed and assessed in our tender review process.

Our tender process utilised our learnings from our hot spot analysis and sought further details on the supplier of security staff uniforms materials and procurement practices. All tenderers provided us with their uniform supplier Modern Slavery Statement, for us to include in our supplier due diligence.

Engagement with our tenderers identified a labour shortage in Australia, and to address this issue we worked with the successful security contractor to retain existing security guards. We were able to retain 90% of the incumbent guards, who transitioned from the incumbent provider to the new contractor. We continue to hold ongoing discussions during the transition process.

Investa is committed to continuous improvement and will use our learnings from the security tender, in our Cleaning Tender, scheduled for FY23. This tender process will investigate the tier 2 suppliers, that support our cleaners, including uniforms, cleaning products and equipment. This tender process will introduce a third-party audit of the shortlisted vendors, in recognition of the higher risks of modern slavery in the cleaning industry.

Engagement with our contractors also assisted in feedback on the accessibility of our grievance mechanisms. We identified that signage was required in our contractor sign-in and break-out areas to provide information on how to contact us. We also recognised that many of our cleaning contracted employees have English as a second language, so we engaged with numerous cleaning providers to determine the common key languages of their employees. This feedback enabled us to identify the need for multi-lingual whistleblower signage for our buildings, which we will roll out in 2023.

Addressing and managing our modern slavery risks

This section of the Statement explains the actions we are taking to address and manage our modern slavery risks. This includes our governance and policy frameworks, supplier engagement, remediation processes and education.

Our Human Rights and Modern Slavery Governance

The Investa Office Management Board has ultimate responsibility for overseeing our modern slavery risk management. On a day-to-day basis, our modern slavery risk management response is implemented by our Human Rights and Modern Slavery Working Group (Working Group).

The Working Group has an oversight and advisory role on human rights and modern slavery across Investa's business functions and reports and makes recommendations to the Executive Committee and the Board(s) and Board Committees as appropriate, including through presentations to board meetings and in quarterly reporting papers. Working Group members include Investa employees from legal, risk and compliance, procurement in operations and

development, people and culture and sustainability and is chaired by our Chief Operating Officer.

A number of Working Group members also participate in the Property Council of Australia's Modern Slavery Working Group and report back to the Investa business and Boards on the ongoing progress of this initiative.

This Working Group formalised our Human Rights and Modern Slavery framework (Framework), in 2021, informed by the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work and the Investa Risk Management Framework.



Our Framework builds on our focuses of how business can empower both employees and our supply chain, in the workplace, marketplace and wider community.



Since 2018, we have been focussed on addressing modern slavery in our supply chains, with the Framework comprising three key focus areas to address modern slavery in our business operations and supply chain specifically focusing our actions on:



Governance

Developing and expanding our practices and processes to address the risk of modern slavery



Procurement

Engaging with our supply chain and understanding their risks of modern slavery in their operations and the products and services we procure



Education

Engaging with our employees on how to identify modern slavery and what to do to address modern slavery in our supply chains

Approach to date

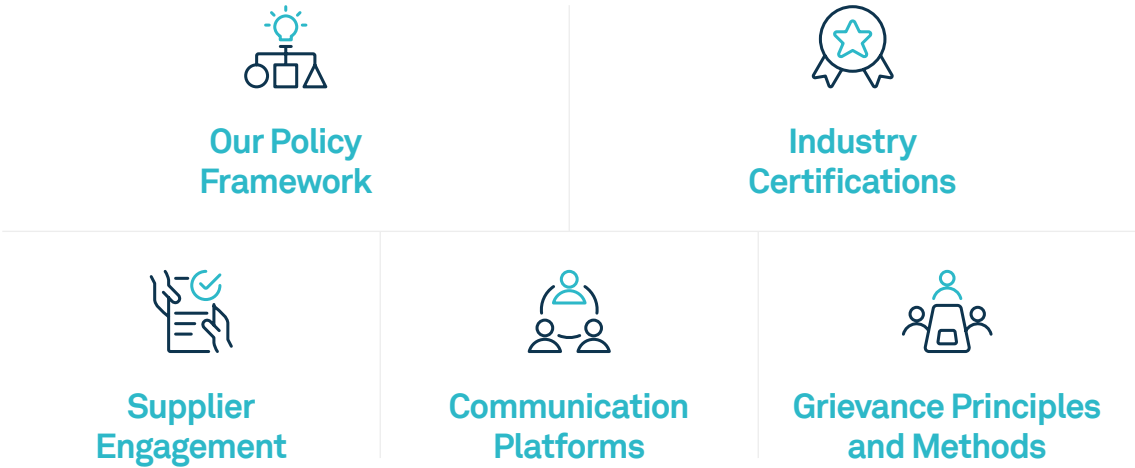


Building on Our Processes and Procedures

This year, Investa reviewed our communication and remediation procedures for anyone (employees, suppliers, customers and the wider community) who may see a risk or something that doesn't look right in the operations of our business, the buildings or the conduct of our people.

Investa was involved in the development of the KPMG and Property Council of Australia Guide (2022) "Listening and responding to Modern Slavery in Property and Construction" and recognises that a human rights grievance can be a concern, feedback or complaint where the issue may or has caused harm.

Investa has developed a range of mechanisms that guide our processes including:



Our policy framework

We have developed practices and processes to build the governance procedures of our supply chain. Our employees and suppliers are further guided by our policy framework, which provides an overview of the our expectations in undertaking business with Investa.

During the reporting year, many policies were updated or reviewed in relation to how they address modern slavery specifically.

Policy	Overview	FY22 Actions
Human Rights Policy	This policy outlines Investa's commitment to respect human rights and contribute to ending all forms of modern slavery. It provides a basis for embedding our responsibility to respect human rights across Investa's business functions.	The Policy, created in 2021, will be reviewed in 2023.
Supplier Code of Conduct	The Supplier Code of Conduct outlines Investa's commitment to conducting all its business in an ethical, legal and professional manner and expectations of suppliers in all aspects of ESG in business conduct.	A review of the Code of Conduct is currently underway to update supplier requirements .
Sustainability Policy	This policy sets out Investa's commitment to ensuring sustainability is considered in every aspect of business operations, including addressing and mitigating supply chain risks.	Investa updated this policy in FY22 to more explicitly address the wider remit of sustainability across the business and expand our commitments to management of our supply chain.
Third Party Supplier Risk Management Framework	This document sets out Investa's approach and expectations to manage third-party supplier risks.	Investa updated the Framework to reflect the results of the risk assessment of third-party supplier engagements, and the escalation and approval requirements were also enhanced.
Whistleblower Policy	The purpose of this policy is to provide everyone either working at or with Investa with the means to raise concerns, freely and without fear of repercussions, regarding actual or suspected misconduct or any improper state of affairs (including tax affairs) within Investa.	This policy was updated in 2022 and reviewed in relation to our communication and remediation practices. Recommendations have been made to enhance greater access to the whistleblower hotline for our supply chain.

Industry certifications

In the procurement of our services and products we seek ethical and sustainability ratings and certifications in accordance with Australian Standards and industry certifications.

Investa applies industry certifications to its development and environmental operational performance through Green Star, NABERS and WELL ratings on our buildings and is proud of our high sustainability ratings for our buildings and developments.

Investa also participates in the Property Council of Australia's Modern Slavery Working Group and initiatives, which provide an industry-wide supplier due diligence framework and questionnaire and supplier education.

Supplier Engagement

Investa requires all suppliers to undertake an annual modern slavery due diligence questionnaire, to outline their modern slavery governance and operational practices and make an attestation with our Supplier Code of Conduct and modern slavery practices upon onboarding.

In major tender processes, Investa has integrated a formal, regular check in with our suppliers to address the terms of the tender during the course of the supplier term. Prior to engagement Suppliers are required to meet the investor onboarding practices which includes modern slavery clauses and provisions.

In development processes, Investa has a regular Project Control Group (PCG) meeting with the construction contractor that addresses a range of topics, including health and safety, environmental and other incidents, ESG compliance/tracking and modern slavery compliance is integrated into these meetings.

Communication Platform

Investa recognises that a communication platform enables workers to have ease of access to reporting issues. Currently, Investa provides information on how to access our Whistleblower email, for anonymous disclosure that protects the whistleblower, through our Whistleblower Policy.

The Working Group reviewed this communication method and found access to the whistleblower mechanisms was difficult to find on our website and the information was only available in English. The Working Group recommended that the Whistleblower contact details be more easily accessible through our website and in our operations.

Investa engaged with our suppliers to understand the key language groups of the workers in our supply chain and is preparing multi-lingual signage, to support equitable access to our communication platforms. This signage will be located at supplier and contractor sign-in locations in our buildings and operations and will outline how to contact us and access our Whistleblower hotline.

Investa launched the Investa Connect Platform in the reporting year, which is used by suppliers to sign into our buildings and operations. Future upgrades to this platform have been recommended to include multilingual signage that outline grievance and communication methods for suppliers when they sign in at our assets.

Investa recognise that grievances may come from others on behalf of the worker, such as third-party stakeholders such as unions and NGOs.

Our communication platforms enable anyone who sees something of concern, in the way we conduct our business in our operations or buildings, to raise any issue with Investa.

Grievance principles and methods

In the reporting year, a review was undertaken of the Investa grievance mechanisms to identify opportunities for improvement and further develop our current risk systems.

Our grievance process is guided by the following principles, that encompass our policy framework and Investa values:

- We strive to do the right thing and do it better
- We provide accessible communication mechanisms that inform stakeholders of our processes and outcomes
- We seek to achieve outcomes and remedies that are consistent with internationally recognised human rights
- We will conduct investigations in a manner that is objective and free from conflicts of interest
- We treat grievances fairly and are respectful to all parties involved
- We provide platforms to raise concerns, freely and without fear of repercussions
- We maintain confidentiality of parties, issues raised and investigations
- We will deal with grievances in a timely and efficient manner
- We undertake continuous engagement and collaboration with our suppliers
- We report on our approach annually



Investa seeks to undertake continuous improvement of our grievance mechanisms and will continue to work with our suppliers to build our collective capacity to addressing modern slavery in our supply chain.

If a grievance is made, we implement the following process, which is based on the UN Guiding Principles:





Our procurement approach

Engaging with our suppliers and understanding their procurement practices supports our modern slavery risk management approach.

This year we continued to expand our understanding by implementing further stages of our supplier due diligence; building on our worker engagement; and targeted engagement of higher risk suppliers.



Due Diligence



Engagement with suppliers and workers



Third party audit

Three of the four stages of onboarding of Investa suppliers onto the Informed365 modern slavery assessment platform has been undertaken:

- Stage 1: Initial operational suppliers onboarded in 2020-2021, including cleaning, security, facilities maintenance and capital works suppliers.
- Stage 2: Construction suppliers were added in 2021-2022, with invitations extended to suppliers supporting Investa development services and construction.
- Stage 3: Suppliers in categories identified in our 2021 Hot Spot analysis, were invited to participate in the platform in 2022.
- Stage 4: seeks to onboard 100% of Investa's suppliers.

The Working Group has developed a range of measures to integrate new suppliers into our due diligence practices as well as requiring our suppliers to address their modern slavery requirements when engaged by Investa by:

- Integrating modern slavery clauses into all service agreements, in our operations and developments
- Integrating modern slavery requirements and completion of due diligence practices into major tender processes
- Integrating ongoing engagement on modern slavery mitigation measures and processes in regular supplier meetings and dialogues

Investa recognise that the workers most at risk in our supply chains have English as a second language. To improve our communication and notification processes, Investa engaged with cleaning and security suppliers in our operations to understand the key language groups of their workers in our buildings. Our suppliers identified seven key language groups including, Nepali, Spanish, Thai, Hindi, Bengali, Portuguese and Arabic. Signage is currently being prepared, in these languages, for workers in our buildings to be displayed at sign in locations notifying them how to raise any concerns with Investa.

Investa is currently developing our supplier audit program, to build on our knowledge of supplier practices, provided in their due diligence questionnaire, and providing greater insights to practices in our buildings. We will pilot this program in FY23, utilising a third-party auditor in our national cleaning tender process. We have advised of this process in our tender documents, to provide transparency to our current and potential future suppliers of our modern slavery practices.

Educating our Workforce and supply chain

Investa continues to invest in a range of methods to inform our workforce and supply chain on how to address modern slavery in our supply chain.

Investa launched our sustainability strategy Transform Tomorrow, which aspires to transform real estate through ESG. Our strategy has set targets and ambitions towards an industry leading real estate platform that delivers sustainable performance, with real human benefits, creating an impact investment framework with sustainable and responsible supply chain and procurement practices.

Sustainability Leaders Series

The Sustainability Leaders Series, commenced in 2022, is designed to educate, challenge our thinking, inspire behavioural change and build a greater understanding of the need for urgent action. Sessions cover a range of ESG topics including addressing modern slavery and we have invited industry thought leaders and innovators sharing valuable insights and knowledge at regular keynote sessions available to all Investa employees.

Sustainability champions from within Investa also participate in these series to showcase how we are implementing our strategy in the key topic area, including modern slavery.

Industry engagement

Members of the Investa Working Group have also participated in a range of industry-led engagements and briefings; and reviewed information papers on a range of modern slavery issues including modern slavery in the solar industry, human rights grievance mechanisms and review of the Modern Slavery Act.

Our goal is to create measurable impact through the positive actions of 100,000 people across our property portfolio and we are leading this change from within, as we recognise that our employees have the capacity to create this positive change and we are providing them with a range of tools to build their knowledge to lead this change.

Sustainability School

In 2022, Investa will launch our Sustainability School, to amplify our thought leadership and be a catalyst for change amongst our tenants, residents and investors, as well as employees. The school will have a comprehensive curriculum, clear learning outcomes and a formal certification process, participants will walk away with a better understanding of how our business and their actions can make a difference to a range of topics including modern slavery.

Building on our existing e-learning on modern slavery, undertaken in our annual compliance, the Investa Sustainability School will be designed to encourage tangible action, in identifying and understanding modern slavery in our supply chain as well as getting involved in community volunteering programs and conscious consumerism. In 2022, Investa became a Fellow of the Supply Chain Sustainability School, which provides our employees and our supply chain with a range of learning modules of responsible supply chain practices.



Assessing effectiveness

Investa aspires to continuous improvement in our modern slavery processes and seek to create practical actions that are targeted to understanding and meaningfully mitigating potential risk areas, if necessary, providing suitable remediation if any incident occurs.

Our Working Group monitors our progress against our Human Rights and Modern Slavery Framework in its quarterly meetings and provides regular updates to the IOMH Board and entity boards on its progress of risk management actions across the Group.



Industry Collaboration

Investa remains committed to the Property Council of Australia's Modern Slavery Working Group and its initiatives that support our understanding of modern slavery in our industry and practices to improve our response in our supply chain.

In the reporting year, our ongoing participation in this working group enabled us to better understand effective communication and grievance mechanisms. Our involvement in the preparation of the KPMG and Property Council of Australia's

"Listening and Responding to Modern Slavery in Property and Construction" informed the Investa review and gap analysis of our grievance mechanisms. This paper provided us a practical best practice guide for the development and formalisation of our grievance practices.

The industry collaboration also provided Investa with knowledge of increasing emerging risks in our supply chain and an understanding of potential impacts in the short and medium term.

Partnering and engaging with Suppliers

As we extend our modern slavery due diligence across our supply chain we have found that knowledge of modern slavery and its impacts is not as well understood in some supplier categories, particularly smaller and corporate service suppliers and some suppliers with offshore owners. To build both our internal employee and supplier capability, Investa became a Fellow of the Supply Chain Sustainability School to provide tools to our suppliers to enhance their knowledge of modern slavery, what to look for and how to respond.

Our review of our grievance mechanisms identified issues in the access to our notification processes. Our engagement and collaboration with suppliers has built our understanding of our supplier

practices and supported our understanding of the different language groups in our supply chain and how we can improve their access to our notification processes in their home languages.

Supplier engagement, in our tender processes, has also enabled further understanding of some Tier 2 suppliers' approach to addressing modern slavery and informed our engagement with suppliers on our expectations with our wider supply chain. This engagement also enabled suppliers to raise issues they are experiencing with labour supply and the development of joint strategies to maintain service levels as well as meet worker requirements.

Consultation and engagement

Investa engage with key stakeholders on modern slavery through a range of techniques and mechanisms.

The Investa Working Group is representative of different parts of the Investa business that are responsible for supplier procurement, operational and development practices, governance and risk and compliance and people and culture. The Working Group prepare the Investa Modern Slavery Statement; and provide updates on progress against our framework at its quarterly meetings, which are then included in quarterly updates to our Boards and investors.

In the reporting year, our engagement with our entities identified that many entities, that did not meet the “reporting entity” definition, under the Australian Modern Slavery Act (2018) sought to understand their reporting and best practice requirements. This arose from our regular engagement with the entities in our quarterly reporting and a recommendation from the Working Group to understand the different entity broader reporting requirements.



How we consult and engage

Investa Funds and Mandates (Reporting Entities)	<p>Investa engage with our Investa managed funds and mandates (our entities) investment management teams and Boards on modern slavery through:</p> <ul style="list-style-type: none">Quarterly updatesAnnual General MeetingStrategy DaysBoard meetingsReporting on progress against our Human Rights and Modern Slavery Framework and in our risk assessment processes
Investa Group Executive and IOMH Board	<p>Investa's Working Group is lead by our Chief Operations Officer. The Investa Group Executive is engaged on modern slavery in updates and annual reporting. Investa Office Management Holdings (IOMH) Board is engaged on modern slavery through:</p> <ul style="list-style-type: none">Quarterly updates at Board meetingsAnnual reporting in the Sustainability Report and Modern Slavery StatementReporting on modern slavery in our risk assessment processes
Suppliers	<p>Investa engage with our suppliers on modern slavery through:</p> <ul style="list-style-type: none">Our due diligence platform and practicesRegular meetings with our suppliersInformation through our operations and engagements with our suppliers
Employees	<p>Investa engage with our employees on modern slavery through:</p> <ul style="list-style-type: none">Annual e-learningResponsible procurement practiceCEO updatesSustainability Leaders Series
Investa Funds and Mandates (Reporting Entities)	<p>Investa engage with out Investa managed funds and mandates (our entities) investment management teams and boards on modern slavery through:</p> <ul style="list-style-type: none">Quarterly UpdatesAnnual General MeetingStrategy DaysBoard MeetingsReporting on progress against our Human Rights and Modern Slavery Framework and in our risk assessment processes
Investors	<p>Investa engages with our unit holders and investors through:</p> <ul style="list-style-type: none">Quarterly updatesAnnual General MeetingInvestment Committee Updates



Looking forward

In FY23, our focus is to:

- Partner with our key entities to strengthen their knowledge on emerging issues and regulation frameworks
- Implement our governance practices in extending accessibility to our remediation practices, through enhancing the information on our website, production and distribution of multilingual signage in our operations
- Increasing engagement with our suppliers through our due diligence platform, regular meetings and improved communication methods
- Expanding our understanding of our supply chain practices through informal engagements and targeted audits in our higher risk settings
- Building our employee and supplier knowledge of modern slavery risks in our supply chain; how to manage and address these risks if found
- Launching our Sustainability School and integrating further modern slavery topics in our Sustainability Leaders Series in 2023
- Encouraging our suppliers to utilise the e-learning modules provided through our partners at the Supply Chain Sustainability School.



Approval and Signature

This Statement was approved by the Board of IWFML on 28 November 2022 as the responsible entity for ICPF, and has been signed by Rebecca McGrath in her capacity as a director of IWFML.

This Statement was also approved by the Board of IOMHL on 24 November 2022 on behalf of its group entities. It has been signed by Rebecca McGrath in her capacity as a director of IOMHL.



Rebecca McGrath
Chairman and Independent Director
Investa Office Management Holdings Limited and
Investa Wholesale Funds Management Limited



Appendix 1: Alignment with mandatory criteria

This Statement covers the seven mandatory criteria for modern slavery statements. The table below indicates where in the Statement each criterion is addressed:

Modern Slavery Act 2018 Criterion	Explanation	Page
1	Identify the reporting entity	
2	Describe the reporting entity’s structure, operations and supply chains	
3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	
4	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	
5	Describe how the reporting entity assesses the effectiveness of these actions	
6	Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	
7	Provide any other relevant information	





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