



# Modern Slavery Statement

FOR THE YEAR ENDED 31 DEC 2023



## About this Statement

This is our fourth Modern Slavery Statement (Statement) prepared by Mulpha Australia Limited (Mulpha) in accordance with the mandatory criteria for modern slavery statements in section 16 of the Modern Slavery Act 2018 (Cth) (Act).

This statement has been prepared in consultation with Mulpha Australia Limited and its controlled entities (the Group)<sup>1</sup>. Mulpha is a wholly owned subsidiary of Mulpha International Berhad, which is listed on the Malaysian stock exchange (BURSA exchange).

In preparation of the statement, we actively engaged and consulted with relevant business units and entities which form part of the Group throughout

the year and more formally reported modern slavery risk, group-wide risk assessment processes, continuous improvement opportunities, action plans and the content of the modern slavery report to the executive led Group Risk Management Committee and the Sustainability Committee which includes representatives from each Group business division and meets on a quarterly basis.

This statement was reviewed by the executive Sustainability Committee and was approved by the Mulpha Board on 29 May 2024.

Further information on our business and how we operate can be found on our website [www.mulpha.com.au](http://www.mulpha.com.au).

### Acknowledgment of Country

We (Mulpha) acknowledge the Traditional Custodians of the lands where we work and live. We celebrate the diversity of Aboriginal peoples and their ongoing cultures and connections to the lands and waters of NSW.

We pay our respects to Elders past, present and emerging and acknowledge the Aboriginal and Torres Strait Islander people that contributed to the development of this resource.

We advise this resource may contain images, in photographs of historical content.

<sup>1</sup>This statement is published by Mulpha Australia Limited (ABN: 44 002 888 039) and includes all controlled entities which Mulpha has control for accounting purposes during year ending 31 December 2023 (references to 'Group', 'we', 'us', and 'our' refer to Mulpha Australia Limited and its controlled entities).



# About this Statement

Mandatory Criteria	Reference Modern Slavery Statement	Page
Identify the reporting entity	– About this Statement	2
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).	– About this Statement	2
Describe the reporting entity’s structure, operations and supply chain	– About Mulpha: Our Structure, Operations and Supply Chains – Our Supply Chains and Modern Slavery Risks	6-11 10
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	– Actions to Assess and Address Modern Slavery Risk	12-14
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	– Actions to Assess and Address Modern Slavery Risk – Case Study - InterContinental Hotels Group <sup>2</sup> : (IHG) Third Party Hotel Manager – Case Study - Food Buy – Due Diligence and Remediation Processes	15-16  17
Describe how the reporting entity assesses the effectiveness of these actions	– Continuous Improvement and Effectiveness Assessment	18-19

<sup>2</sup>References to the InterContinental Hotel Group or IHG are references to IHG Hotels Management (Australia) Pty Ltd (ABN: 33 008 413 367) and its affiliates, who have been engaged by a Mulpha Group entity to manage its IHG hotels assets.



# FY 23 Highlights



### Enhanced governance processes

to ensure continued, growing and unified progress across the group through formation of a Sustainability Committee (in Q1 2023).



### Review and refresh of our suite of policies

and undertook required training following two major legislative changes to the Fair Work Act 2009 (cth) and Anti-Discrimination and Human Rights Legislation Amendment (Respect at Work) Act 2022.  
[www.mulpha.com.au](http://www.mulpha.com.au)



### Engagement survey completed

with a favorable engagement score of 73%.



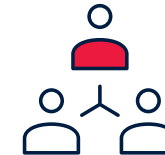
### Assessed our progress and effectiveness

with reference to the Property Council of Australia and Edge Impact Pathway to respecting Human Rights and Addressing Modern Slavery Risks.



### Continued education and training

Online modern slavery training available to all staff members through Mulpha's online training platform and poster campaign at key assets.

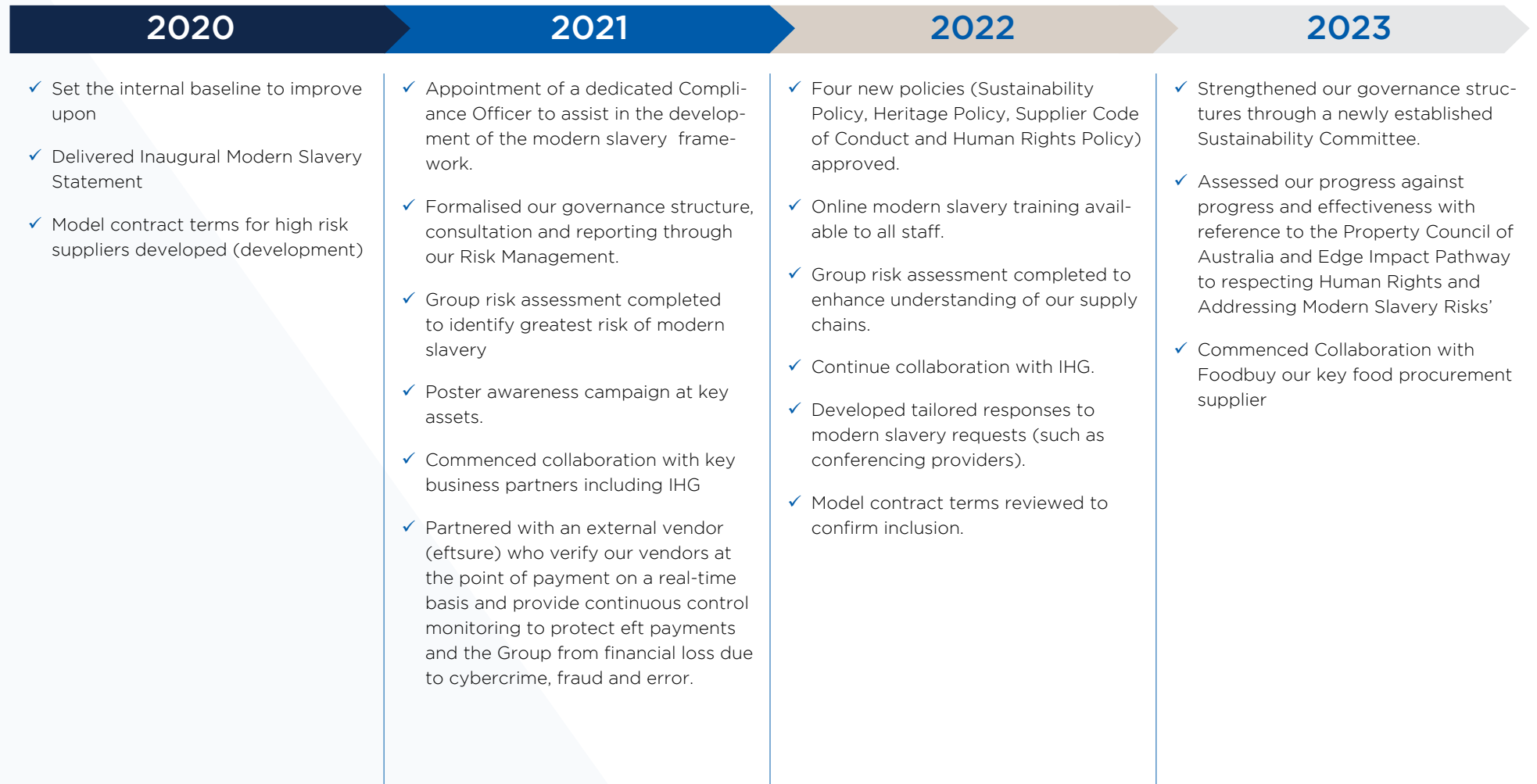


### Continued collaboration with IHG and Foodbuy

to improve collective understanding of direct and indirect supply chains, governance, training and actions to address modern slavery.



# Timeline: Our Achievements and Journey





# About Mulpha: Our Structure, Operations and Supply Chain

## Our Structure

The Group has over 30 years' experience in Australia as an innovative investment company and a strategic real estate debt and equity investor in hospitality and leisure, residential, commercial property development, retail and office sectors. The Group has a portfolio of luxury resorts, businesses and products.

The unique strength of the Group, is its deep knowledge and understanding of real estate assets and markets, coupled with its intensive management and experience in running operating assets and businesses. Its dedicated local team are paramount in building and sourcing these outstanding opportunities, whether it be in real estate or in business innovation.

The Group comprises Australian incorporated subsidiaries and trusts which own and operate a number of businesses, predominately focused on real estate property development and investment, hospitality & hotel operations, and debt, fund and asset management. These wholly owned subsidiary companies engage employees and enter various contracts for supply of goods and services. In addition, Mulpha carries on some businesses through a partnership structure with third parties (an example being The Hotel School, a tertiary education provider, which is a partnership between Mulpha and Southern Cross

University) and other businesses are owned and operated through a joint venture structure with third parties. The Group has entered into a hotel management agreement with a subsidiary of the InterContinental Hotels Group of companies in Australia or IHG Hotels Management (Australia) Pty Ltd (IHG) for each of its hotels; InterContinental Sydney, InterContinental Sanctuary Cove and InterContinental Hayman Island (IHG hotels).

The registered office of The Group's incorporated companies is in Sydney, Australia, while the place of business of each subsidiary company will depend on where the business operates on the east coast of Australia.

## Our People

The Group employ 1,445 (FY22 1,236) full time, part-time and casual people being 782 (54.12%) females, 661 (45.74%) males and 2 (0.14%) others. Our employee numbers increased in 2023 in line with our growing business model which included the opening of Swing City in Norwest and Lane Retreat at Bimbadgen Estate.

The majority of our employees are based in Australia across New South Wales 618 (FY22 438), Queensland 799 (FY22 758), Victoria 26 (FY22 39), Western Australia 1 (FY22 1) and South Australia 1 (FY22 0). 916 (FY22 808) of our employees are on permanent contracts and we employ 529 (FY22 428) casual workers.

In 2023 the group employed 3 marketing consultants who reside in the Philippines through a dedicated employment agency. Our external agency contract each marketing consultant and a fee is paid to the external agency for their services. Our external agency ensure that each consultant is paid at market rate and all social, economic and work, health and safety procedures are adhered to in accordance with relevant Philippine legislation. Our external agency deliver induction training and there is a monthly KPI process which is measured by our external agency. The three consultants are well connected to our Australian office with clear reporting lines directly

to the Australian General Manager, Marketing, dedicated Mulpha email addresses and regular team meetings. In May 2024, one of the employees visited Australia to obtain a deeper understanding of our hospitality venues.

The group has a Malaysian parent (Mulpha International Berhad) who are contracted to provide services for Mulpha Australia Limited in relation to shared services and corporate matters such as accounting, finance and tax. Our Malaysian employees are offered a dedicated Malaysian office and competitive merit-based remuneration packages and leave entitlements and allowances in line with Malaysian market expectations. There is frequent communication between our Malaysian and Australian office which includes;

- members of the Australian Executive leadership team visit the Malaysian office annually or more frequently if required; and
- The General Manager, Malaysia is a member of the Mulpha Australian Sustainability Committee and travels to Australia on an as required basis.

The Group has a diverse range of employees across many job functions including asset management, property services, development, project management, operations and event



# About Mulpha: Our Structure, Operations and Supply Chain

management who are supported by shared services operations such as Risk Management, Health, Safety, Environment (HS&E), Legal, Compliance, Company Secretary, Governance, Finance, Marketing and Human Resources. The Group has a Chief Executive Officer, Mr Greg Shaw and an executive leadership team which operates Mulpha’s business operations.

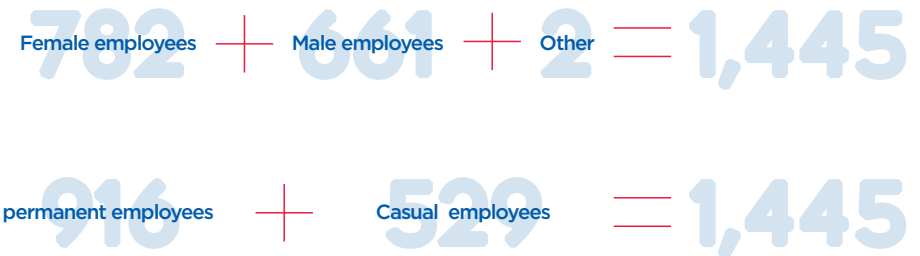
We continually assess and review recruitment processes and working conditions within our operations and as such;

- ✓ All our employees are paid in line with or above the award that covers their industry or occupation and in accordance with Australia’s minimum wage entitlements.
- ✓ We have systems and processes in place to monitor award agreements and classifications at the time of hire.
- ✓ In 2023 we reviewed and where required successfully negotiated re-vised enterprise agreements across all our operations in line with the Secure Jobs Better Pay amendments to the Fair Work Act.

- ✓ Have in place group-wide software to capture time and attendance, which includes review by each operation of overtime and excessive hours.
- ✓ Have a dedicated Group People and Culture Team of 8 who actively engage with all operational businesses and regularly visit each operational site.
- ✓ we have processes in place to ensure that all team members age is verified, hold working rights in Australia and comply with visa conditions (where required). We confirm right to work documents as part of our onboarding processes and use an independent checking system to check relevant employees’ visas.
- ✓ In April 2023, an engagement survey was conducted using an external specialty provider (CultureAmp), with an overall favorable engagement score of 73%.

- ✓ We continually review our policies and procedures and;
  - ✓ In 2023, we revised our suite of policies and undertook required training following two major legislative changes to the Fair Work Act and the Anti-Discrimination and Human Rights Legislation Amendment (Respect at Work) Act 2022.

- ✓ Re-freshed our Employee Due Diligence policy which sets out our approach to verify the integrity, identity and credentials of prospective employees, and to provide assurance that our employees are entrusted to perform their role and responsibilities adequately and effectively.



<sup>3</sup>The Group has several employing entities which include staff members at Mulpha head office, IHG hotels, Bimbadgen Estate, Enacon Parking, Mulpha Education, Norwest and Mulpha Funds Management.



# About Mulpha: Our Structure, Operations and Supply Chain

## Our Operations

The Group has operations in Queensland, New South Wales and Victoria.







# About Mulpha: Our Structure, Operations and Supply Chain

## Our Operations

At 31 December 2023 Mulpha had a diverse portfolio across the following key areas:



### Hotels and Hospitality

- Mulpha InterContinental Sydney
- InterContinental Sanctuary Cove Resort
- InterContinental Hayman Island Resort
- Bimbadgen, Hunter Valley
- Emma's Cottage, Hunter Valley
- Lane Retreat, Hunter Valley
- Marritz Hotel, Perisher
- Salzburg Apartments, Perisher
- Swing City, Norwest
- Various smaller hospitality venues, NSW and QLD



### Commercial and Retail

- Transport House, Sydney
- Sanctuary Cove Marina
- Sanctuary Cove Marina Village
- Sanctuary Cove Country Club
- Norwest Marketown, NSW
- Vera Wang Bride Australia
- Capri On Via Roma Shopping Centre, QLD
- Brimbank Shopping Centre, VIC (Operational control and 20% investment)



### Events

- A Day on the Green Bimbadgen
- Sanctuary Cove International Boat Show
- Sydney International Boat Show



### Education

- The Hotel School Sydney
- The Hotel School Brisbane
- The Hotel School Melbourne
- The Hotel School Hayman Island
- Online Courses



### Real Estate Development

- Norwest Residential and Business Park, NSW
- Mulgoa Rise, NSW
- Menangle, NSW
- Sanctuary Cove, QLD



### Car Parking

- Cathedral Street Car Park, Sydney
- InterContinental Sydney Car Park
- Norbrik Drive Car Park, Bella Vista



### Funds and Debt Management

- Mulpha Funds Management, Sydney and Shenzhen, China



# About Mulpha: Our Supply Chains and Modern Slavery Risk

Mulpha recognises that our supply chain is complex and that there is potential to directly cause, contribute to or be directly linked (through another entity such as a principal contractor in the construction industry) to modern slavery.

As part of our ongoing commitment to operate responsibly, and to ensure we engage suppliers who are aligned with these commitments, Mulpha has certain expectations of its suppliers, which are documented within the Supplier Code of Conduct.

## Modern Slavery Supply Chain Risk Map

Recognising that a comprehensive assessment of our supply chain is required as part of our ongoing supply chain assessment processes for the third year we completed a Group risk assessment in 2022 and reviewed our suppliers in 2023 to identify the areas within our corporate, operational and direct supply chain that are at greatest risk of modern slavery.

The risk assessments primary focus included:

- Identification of the products and industries within our supply chain.
- Analysis of spend by vendor and trade industry against social hotspot database information.
- Grouping of vendors by industries and spend utilising an internal rating based on high or low value and high or low risk industries or products to assist in our supplier due diligence and effectiveness assessment.
- Focuses on three primary areas of procurement of services and products relevant to property and construction: corporate procurement, operations and direct procurement<sup>4</sup>.

The table below provides an overview of our supply chain including critical risk areas and attributes associated with each of the identified critical risk areas:

Primary Area	Critical Risk Areas in our operations	Attributes
Corporate Procurement	Merchandising	Low skilled labour, labour dependency, labour intensive roles, temporary, night-time or contractor workers, lack of bargaining rights and/ or grievance mechanisms and work-related injuries.
	Office supplies	
	Travel	
Operations	Asset management: building services including security, cleaning, installation and maintenance	
Direct Procurement	Real estate development: construction	
	Hotel operations and hospitality	

<sup>4</sup>With reference to Property, Construction and Modern Slavery (2020) | Australian Human Rights Commission.



# About Mulpha: Our Structure, Operations and Supply Chain

## Supplier Analysis

The Group operates highly diverse business, and through our supplier analysis identified that our primary sources of modern slavery risk stem from:

- Real estate development which is largely managed through Principal Contractor relationships with third party construction companies, who procure the construction materials and building materials required for our developments.
- Asset management which includes high risk areas such as building services (security, cleaning, installation and maintenance).
- Hotel and hospitality operations which includes direct and indirect procurement of goods and services, such as food and beverages, operating supplies (such as linen, uniforms and bathroom amenities), building services including security, cleaning,
- installation and maintenance. Procurement occurs at the local hotel or venue level.

The vast majority of our suppliers are based in Australia. We are in the process of analysing the location and modern slavery risks associated with our international suppliers.

Within these businesses we directly procure from industries such as: labour hire, construction trades, cleaners, security and sourcing building materials, sourcing products and potentially, from overseas.

We identified development spend and more specifically building suppliers who are engaged as the principal under a Construction Management Agreement as our largest procurement costs. Each of these builders are required to report any instances of modern slavery under the terms of their agreement with Mulpha. Development spend is from Australian suppliers and distributors, however we are mindful that these direct suppliers have more complex, and often overseas, supply chain considerations. This extended supply chain has been identified as one of our highest risk areas for modern slavery.

We are committed to working with our suppliers and the extended supply chain to identify and address modern slavery and Our hospitality operations and hotel business spend is our second largest procurement cost and we recognise that there are health and safety risks and ethical procurement risks within these business operations. The direct and indirect supply chains of our hospitality and hotel businesses have been identified as a high-risk area for modern slavery. We are committed to collaboration with a subsidiary of the InterContinental Hotels Group of companies in Australia or IHG Hotels Management (Australia) Pty Ltd<sup>5</sup>: (IHG) and understanding ethical and responsible procurement risk within these businesses (further detail is available in the case study on [page 15](#)).

Recognising food supply is a key risk area in our hotels throughout 2023 we collaborated with Food Buy who are contracted by our hotels to deliver hospitality food services. This collaboration increased our understanding of ethical and responsible

procurement within our hotels and values and commitments, supported by Food buy policies and procedures were reviewed as part of the governance of our procurement operations (further detail is available in the case study on [page 16](#))

<sup>5</sup>References to the InterContinental Hotel Group or IHG are references to IHG Hotels Management (Australia) Pty Ltd (ABN: 33 008 413 367) and its affiliates, who have been engaged by a Mulpha Group entity to manage its IHG hotels assets.



# Actions to Assess and Address Modern Slavery Risk

## Governance

The Mulpha board of directors is ultimately accountable for the performance and affairs of the Group. The board of directors are responsible for the overall risk management strategy and directives for implementation to ensure that the principles and requirement of managing risks are consistently adopted throughout the Group.

Recognising that strengthening our governance processes ensures continued, growing and a unified progress in Q1 2023 a Sustainability Committee was established in accordance with a resolution passed by the Mulpha Australia board of directors. The Sustainability Committee are committed to:

- aligning our strategy and growing our business in a way that promotes sustainable and responsible business objectives;
- integrating sustainability issues into our investment decision-making and business operations; and
- life-cycle sustainable design principles from conception through to construction and long-term performance across our developments.

The sustainability charter outlines the purpose of the committee, its composition, authority, and duties and responsibilities and includes establishment and tracking of measurable human rights objectives (including recognising Group progress)

In 2023 Quarterly reports were provided to the to the Sustainability Committee which includes:

- developing and implementing Mulpha’s group wide approach for identifying and managing modern slavery risk in the Group’s supply chains;
- ensuring consistent processes around supplier data management;

- considering allocation of responsibilities across the Group;
- Building and collaborating with key business partners to strengthen the Group’s response to modern slavery; and
- review of modern slavery reports prior to Board of Director approval.

We are committed to high standards of conduct and ethical behaviour across the business to ensure that individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported. Our Whistleblowing Policy articulates the avenues which employees and other stakeholders can raise concerns of actual

or suspected misconduct. Appropriate remediation steps are taken in line with our governance framework. There have been no incidents of modern slavery raised in the reporting period.





# Actions to Assess and Address Modern Slavery Risk

## Group Policies and Procedures

Mulpha is committed to maintaining a high standard of ethical conduct in its business and corporate governance.

Recognising that an inclusive and unified Mulpha approach allows the Group to promote companywide sustainable initiatives (including modern slavery and human rights) all people managers are encouraged to regularly engage employees to consider business appropriate sustainable outcomes in their day-to-day decision making.

Within our internal governance framework, we have several policies that set our expectations for employees and suppliers to act honestly and in good faith, comply with all applicable laws, rule, regulations (both in letter and in spirit), and to not discriminate unlawfully or engage in any behaviour that is harassing or bullying, or act in any way that puts the health or safety of employees or contractors at risk.

All staff communications throughout the year encouraged all employees to familiarise themselves with the content and spirit of Group policies.

Our key policies relevant to modern slavery are set out in the table on the following page.

## Our operation - Ongoing engagement

Mulpha recognises that continual engagement with our operations is required to minimize the risk of modern slavery. As an active asset manager our core shared services functions (legal, HR, internal audit and Health and Safety) continually communicate and report to Executive Management and relevant Board and subsidiary Board Committees including key risks such as work, health and safety and modern slavery.

In 2023 we continued our health and safety asset inspection program and HSE safety alert communications through our dedicated WHSE Manager. The case studies below (IHG and Foodbuy) highlights our continued focus and work to address modern slavery risk in partnership with key suppliers.



Policy	Purpose and relevance to Modern Slavery	Policy Communication
<b>Sustainability Policy</b>	Our commitment to aligning our strategy and growing our business in a way that promotes sustainable initiatives (including modern slavery and human rights) and provides a positive impact to the environment and local communities.	Available on our website <a href="#">Sustainability - Mulpha</a> People managers are encouraged to regularly engage employees.
<b>Human Rights Policy</b>	Recognition that our supply chain is complex and that there is potential to directly cause, contribute to or be directly linked (through another entity such as a principal contractor in the construction industry) to modern slavery. The policy sets out our standards in relation to human rights and that we actively engage and consult with relevant business units and entities and formally report to the relevant committee.	Available on our website <a href="#">Sustainability - Mulpha</a> People managers are encouraged to regularly engage employees.
<b>Supplier Code of Conduct</b>	As part of our ongoing commitment to operate responsibly, and to ensure we engage suppliers who are aligned with these commitments, Mulpha has certain expectations of its suppliers, which are documented within this Supplier Code of Conduct.	Available on our website <a href="#">Sustainability - Mulpha</a> People managers are encouraged to regularly engage employees and suppliers to ensure they are familiar with the content and spirit of the code.
<b>Heritage Policy</b>	As part of our ongoing commitment to operate responsibly we are committed to: <ul style="list-style-type: none"> <li>– protecting, conserving and investing in our heritage listed assets;</li> <li>– ensuring our heritage listed properties are maintained, renovated and restored in compliance with all relevant laws and regulations;</li> <li>– securing our heritage listed assets for sustainable reuse and raising customer awareness of each asset’s heritage value;</li> <li>– recognising and minimising our asset impacts on the Great Barrier Reef Marine Park as a World and National Heritage Site; and</li> <li>– applying an ethical approach to our business</li> </ul>	Available on our website <a href="#">Sustainability - Mulpha</a> People managers are encouraged to regularly engage employees and suppliers to ensure they are aware of the heritage significance of our assets.
<b>Code of Conduct</b>	Our commitment to observe and adhere to high standards of corporate responsibility and conduct ourselves in accordance with these standards. The Code is intended to provide guidance for directors, senior executives and other employees regarding the standards we expect in the conduct of our business. The Code guides us to operate at high standards of business integrity, to comply with the relevant laws and regulations and to ensure that the Code is never compromised for the sake of results.	Available to all employees on Mulpha’s SharePoint page. Signed by all new employees on induction. Re-freshed in 2023
<b>Anti-Bribery and Corruption Policy</b>	Our commitment to maintaining a high standard of ethical conduct in business and corporate governance and our zero-tolerance approach towards all forms of corruption.	Available on our website <a href="#">Corporate Governance - Mulpha</a>
<b>Whistle-blower Policy</b>	Developed to ensure high standards of conduct and ethical behaviour across the business and to provide assurance that individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported.	Available on our website <a href="#">Corporate Governance - Mulpha</a>
<b>Enterprise Risk Management Policy</b>	The purpose of the Enterprise Risk Management Framework is to assist the organisation in protecting and creating value by managing risks and integrating risk management into decision making.	Available to all employees on Mulpha’s SharePoint page.
<b>Health, safety and Environment Policy</b>	Our commitment to protecting the health and safety of all persons in the workplace including employees, contractors and other visitors.	Available to all employees on Mulpha’s SharePoint page. Provided to all new employees on induction. Regular WHS communications from a dedicated WHS Manager.
<b>Model contract terms</b>	A review of high-risk (industry) contracts, namely construction, was conducted and model modern slavery clauses were developed and provided to the Development business to ensure our standard terms and conditions includes that Mulpha’s contractors and suppliers have an obligation to identify the risk of, and prevent the occurrence of, modern slavery within its organisation and supply chain, and to report to Mulpha in relation to their modern slavery risk management.	Managed by internal legal for inclusion in all relevant contracts.



# Case Study InterContinental Hotel Group<sup>6</sup>:(IHG) Third Party Hotel Manager

Collaboration with our business partners assists in our collective understanding of our direct and indirect supply chains, and we can focus on high risk and high value vendors when engaging with suppliers within our operations. The InterContinental Hotels Group of companies or IHG Hotels Management (Australia) Pty Ltd (IHG) are engaged to provide third party hotel manager services for three of our largest hotel assets being InterContinental Sydney, InterContinental Sanctuary Cove Resort and InterContinental Hayman Island Resort (IHG hotels).

This case study outlines our partnership with IHG and our commitment alongside IHG to understand modern slavery risk within our hotel operations. We recognise that there are risks in the hospitality industry of hotels being used by traffickers to exploit their victims and our customers may not always be at our hotels of their own free will and there are risks within the direct and indirect supply chains of hospitality operations.

Through discussions with IHG we recognise that they are a global leader in the hospitality and tourism sector,

have an opportunity to affect positive change in people’s lives and that IHG seek to advance human right through their business activities and by working together with others to identify challenges are committed to ongoing human rights due diligence. Within the framework of each hotel management agreement of the IHG hotels, collaborate with IHG on matters arising out of operations relating to IHG hotels such as assists in:

- a better understanding of issues ‘on the ground’;
- verification of action happening within our IHG hotels operations and their supply chains;
- access to IHG global expertise made available to IHG hotels under terms of each hotel management agreement;
- verification of any issues and confirmation that response is operating as described;
- identification of modern slavery risks as part of ongoing due diligence;
- increased awareness of the risk of modern slavery within the IHG hotels’ supply chain;

- subject to relevant laws and contracts, exchange of information with a key business partner;
- continued focus to develop policies and procedures in support of modern slavery risks.

In 2022 and throughout 2023 Mulpha commenced periodic modern slavery meetings with IHG to improve collaboration and to understand ‘on the ground’ issues at each of the IHG hotels assets. These meetings are a formal opportunity to report any suspicions of modern slavery or incidents at each of these key assets. In the reporting period there were no instances of modern slavery or incidents reported at a Mulpha owned asset.

### Ongoing activities & monitoring

- Employees are provided training on induction, and annually, on the requirements of the Modern Slavery Act. Tracking of training progress and completion rates is discussed at the periodic collaboration meetings.

- Our Group internal audit team verified as part of internal audit processes that modern slavery awareness posters are available at each site.
- Continue to develop our understanding of suppliers within our existing IHG hotels supply chains and IHG’s due diligence processes arising out of operations of the IHG hotels.
- IHG policies provided to employees and suppliers include:
  - Code of Conduct
  - Human Rights Policy
  - Human Rights Brand Standard
  - Responsible Labour Requirements
  - Supplier Code of Conduct
  - Human Resources Policies

Further information on IHG’s progress in accordance with the UK modern Slavery 2015 is available within the IHG’s 2023 Modern Slavery Statement [Modern Slavery - InterContinental Hotels Group PLC \(ihgplc.com\)](https://www.ihgplc.com/modern-slavery)

<sup>6</sup>References to the InterContinental Hotel Group or IHG are references to IHG Hotels Management (Australia) Pty Ltd (ABN: 33 008 413 367) and its affiliates, who have been engaged by a Mulpha Group entity to manage its IHG hotels assets



# Case Study Foodbuy, Food and Hospitality Procurement

Recognising that food procurement and food supply chain has been identified as a material cost and high-risk area in relation to modern slavery risk, during 2023 we commenced collaboration and due diligence with Foodbuy (www.foodbuy.com.au) who are our leading food and hospitality supply chain provider for two of our major hotels InterContinental Sanctuary Cove and InterContinental Sydney.

Foodbuy are a subsidiary of Compass Group Australia and part of the global Compass Group PLC, which is listed in the UK. Further information on Compass Group PLC progress in accordance with the UK modern Slavery 2015 Act (available here [2023 Modern Slavery Statement](#)) and its progress in line with Australian Modern Slavery Act 2018 (available here [Foodbuy 2023 Statement](#))

This case study provides a high-level overview of our collaboration and outlines how we look at our operations and high-risk areas within our supply chain to highlight the importance we place on building relationships. Through working with Foodbuy we build trust, transparency and a deeper understanding of our supply chain and we will continue to work with Foodbuy to ensure our hotels provide ethically sourced food which can be traced to source. Written agreements are in place

with Foodbuy to ensure food safety and ethical trading standards are adhered to.

### Core pillars of Foodbuys ethical supply chain

Our collaboration included detailed discussions with Foodbuy’s subject matter expert and Executive Director Australia to understand the eight core pillars of their Worldfirst™ ethical supply chain platform as described below:

#### Dedicated SEDEX partnership

As part of their commitment to ethical procurement, Foodbuy has a dedicated partnership with SEDEX, a recognised and global sustainable supply chain technology solution which supports Foodbuy to manage, assess and report on sustainability and modern slavery performance of suppliers contracted through the platform. Detailed discussions with Foodbuy focussed on their standard supply chain processes which include registration with SEDEX and audit processes. Alongside the adoption of SEDEX, Foodbuy both undertake themselves and require suppliers to conduct independent SMETA audits (Sedex Members Ethical Trade Audit). a bespoke ethical audit methodology that encompasses all aspects of responsible business practice. SMETA is the most widely used social audit in the world and was designed to enable businesses to evaluate working

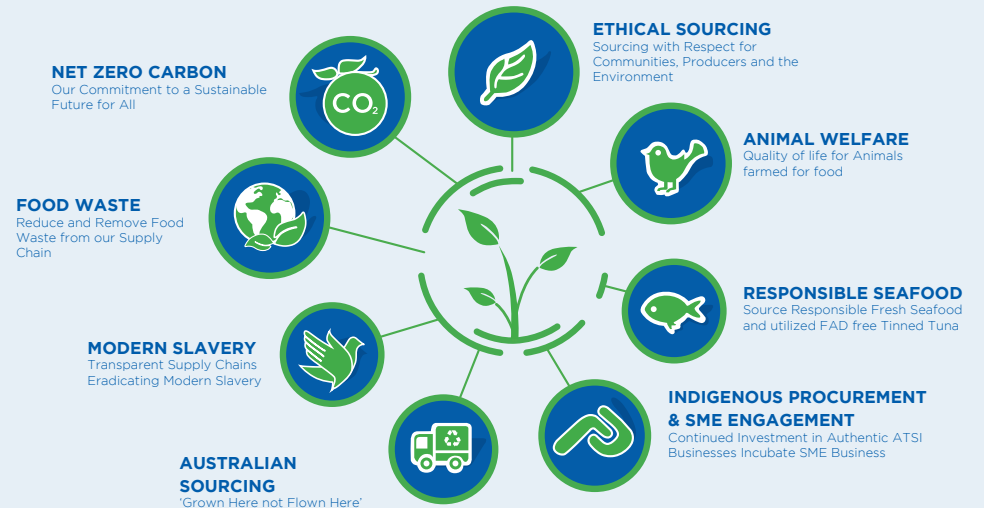
conditions within their supply chain.

Foodbuy assess all available SMETA audits to both understand, review and to take action to support the supply chain awareness of and adherence to required standards in human rights and the eradication of modern slavery in both domestic and international supply chains.

#### Purpose drive commitment

Foodbuy as our chosen food service provider to InterContinental Sydney hotel and InterContinental Sanctuary Cove Resort commit to purpose driven procurement which includes:

- Food safety – establishing consistent standards of quality and integrity
- Ethical trading – business standards and codes for ethical supply including modern slavery.
- Compliance systems to monitor and track compliance (risk ratings provided) through a selection and onboarding tool
- Traceability – ability to trace all products to source.
- Documented policies and procedures
- Training







## Due Diligence and Remediation Processes

Following our supply chain risk assessment process, we recognise that systemic risks are embedded in our operations and supply chains and each risk cannot be solved in isolation. In FY23 we continued to complete several initiatives as part of our Group wide approach to modern slavery.

Area	Initiatives	Status
<b>Governance</b>	Continue to report quarterly to the Sustainability Committee and Board relevant matters in relation to Modern Slavery.	
<b>Training</b>	Recognising the importance of professional development rolled out all staff online modern slavery training.  Dedicated Compliance officer who monitors and reports through regulatory updates legal, Property Council of Australia, Australian Border Force and media updates to ensure any newly identified areas of modern slavery risk are considered in our approach.  courses.	
<b>Actions to Address Modern Slavery – Collaboration</b>	Continued collaboration with key business partners (refer InterContinental and Foodbuy case study) to enhance our ‘on the ground’ approach to modern slavery.	
<b>Actions to Address Modern Slavery</b>	Responded to all requests in relation to modern slavery from various business partners such as conferencing providers.  Continued to review processes and recognised the importance of managing high risks suppliers such as cleaners and security contractors.	
<b>Actions to Address Modern Slavery – Contract Terms</b>	Continued review of high-risk (industry) contracts, namely construction, and developed model modern slavery clauses for the Development business to ensure our standard terms and conditions include that Mulpha’s contractors and suppliers have an obligation to identify the risk of, and prevent the occurrence of, modern slavery within its organisation and supply chain, and to report to Mulpha in relation to their modern slavery risk management.	
<b>Actions to Address Modern Slavery – Due Diligence</b>	Completed a review of our largest building supplier’s key modern slavery procedures.	



# Continuous Improvement and Effectiveness Assessment

At present, and as our management of modern slavery risks progress, having ways to assess the effectiveness of our modern slavery risk management are important. The current methods we employ for assessing effectiveness are as follows:

- Regular review and update of our approach to modern slavery risks through consultation with our executive led Risk Management Committee.
- Ensuring our frameworks, policies and procedures maintain efficacy and currency and address modern slavery by way of regular reviews.
- Engagement with high risk and high value vendors and suppliers to ensure they are aware of our commitment in this area.

- Monitoring and reporting on the progressive addition of model terms and conditions that address modern slavery risks into all new and renewed supply and service contracts.
- Continue with a regular training program throughout the Group's operations.
- Ensuring that regular reporting to the Executive Risk Committee occurs and that exceptional items are escalated, as required.

## Pathway to Respecting Human Rights and Addressing Modern Slavery

We recognise that abuses of human rights and modern slavery situations put people at risk of serious harm and open our business to financial, reputational and operational impacts. As such we are committed to continue to improve and assess our approach to modern slavery.

For our fourth modern slavery report we have assessed our progress and effectiveness with reference to the Property Council of Australia and Edge Impact Pathway to respecting Human Rights and Addressing Modern Slavery Risks' published in March 2024. Documentation of Our Pathway has informed our setting of FY24 priorities and assists in mapping our current progress against the identified 10 actionable steps.



# Continuous Improvement and Effectiveness Assessment

## Our Pathway

### Understand and Commit

#### Our Actions

We recognise that our supply chain is complex and that there is potential to directly cause, contribute to or be directly linked (through another entity such as a principal contractor in the construction industry) to modern slavery. Our Human Rights Policy sets out our standards in relation to human rights and that we actively engage and consult with relevant business units and entities and formally report to the relevant committee. Our annual Modern Slavery Statement is prepared in accordance with mandatory criteria for modern slavery statements in Section 16 of the Modern Slavery Act 2018 (Cth) (Act).

- ✓ Board approved public Modern Slavery Statement
- ✓ Commitment communicated to all employees annually
- ✓ Dedicated Compliance Officer responsible for addressing human rights
- ✓ Our Whistleblowing Policy articulates the avenues which employees and other stakeholders can raise concerns of actual or suspected misconduct.
- ✓ Regular review of our key policies to ensure they maintain efficacy and all employees are familiar with the content and spirit of Group policies.

#### Future Priorities

**Continue** to develop our understanding of risk within our operations and to aligning our strategy and growing our business in an ethical way that promotes human rights and provides a positive impact to the environment and local communities.

### Train Your Staff

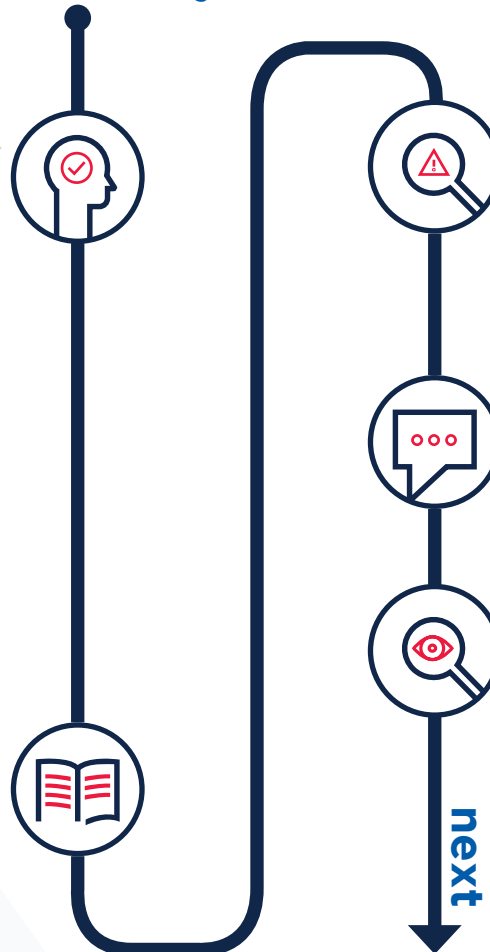
#### Our Actions

Tools and education are provided through:

- ✓ Online training platform (Mulpha Academy)
- ✓ Regular all staff communication
- ✓ Poster awareness campaign (key assets)
- ✓ Ongoing monitoring of legal, Property Council of Australia, Australian Border Force and media updates to ensure any newly identified areas of modern slavery risk are considered in our approach.
- ✓ Open communication for all staff through a dedicated Compliance Officer

#### Future Priorities

**Continue** with a regular training program throughout the Group's operations which includes employee communication and awareness.



### Identify Risks and Assign Responsibilities

#### Our Actions

Clear governance structures which are underpinned with regular reporting to our Sustainability Committee (Executive Management) and Board which tracks our continued progress to address modern slavery risk. All areas of risk or exceptional items are escalated, as required.

- ✓ Risk assessment process which maps high risk areas
- ✓ Dedicated Compliance Officer

#### Future Priorities

**Expand** mapping of risk with the organisation

### Communicate your Actions

#### Our Actions

Publication of Fourth Modern Slavery Report. Key learnings and continual improvement communicated to all staff and reported on the Mulpha website.

Supplier Code of Conduct

#### Future Priorities

**Continue** to communicate actions to our employees, key suppliers and stakeholders.

### Monitor and Evaluate your Suppliers

#### Our Actions

Whole of business approach to monitoring and evaluation suppliers which includes;

- ✓ Model contract terms - to ensure our standard terms and conditions includes that Mulpha's contractors and suppliers have an obligation to identify the risk of, and prevent the occurrence of, modern slavery within its organisation and supply chain, and to report to Mulpha in relation to their modern slavery risk management.
- ✓ Collaboration with identified high risk suppliers such as Foodbuy and IHG and Engagement with high risk and high value vendors and suppliers to ensure they are aware of our commitment in this area.
- ✓ Working Conditions - We continually assess and review recruitment processes and working conditions within our operations.

#### Future Priorities

Ongoing Engagement which includes;

- ✓ Continuing to engage with existing business partners with a focus on key asset managers and building contractors to identify areas of improvement across our supply chains and to better understand risk within our supply chains.
- ✓ Monitoring and reporting on the progressive addition of model terms and conditions that address modern slavery risks into all new and renewed supply and service contracts.
- ✓ Expansion of our risk assessment processes and enhancement of our supplier due diligence processes.



# Continuous Improvement and Effectiveness Assessment

## Our Pathway

**Make Better Purchasing Decisions**

**Our Actions**

- ✓ Ongoing commitment to continually review our supply chain to assess modern slavery risk.
- ✓ Project manager oversight of all key development projects and dedicated project control group for each development.

**Future Priorities**

**Expand** on our risk assessment processes and enhance our supplier due diligence processes.

**Build Supplier Relationships**

**Our Actions**

- ✓ Collaboration with identified high risk suppliers such as Foodbuy and IHG built on trust and learning
- ✓ Supplier Code of Conduct
- ✓ Model Contract Terms

**Future Priorities**

**Continue** to engage with existing business partners with a focus on key asset managers and building contractors to identify areas of improvement across our supply chains and to better understand risk within our supply chains.

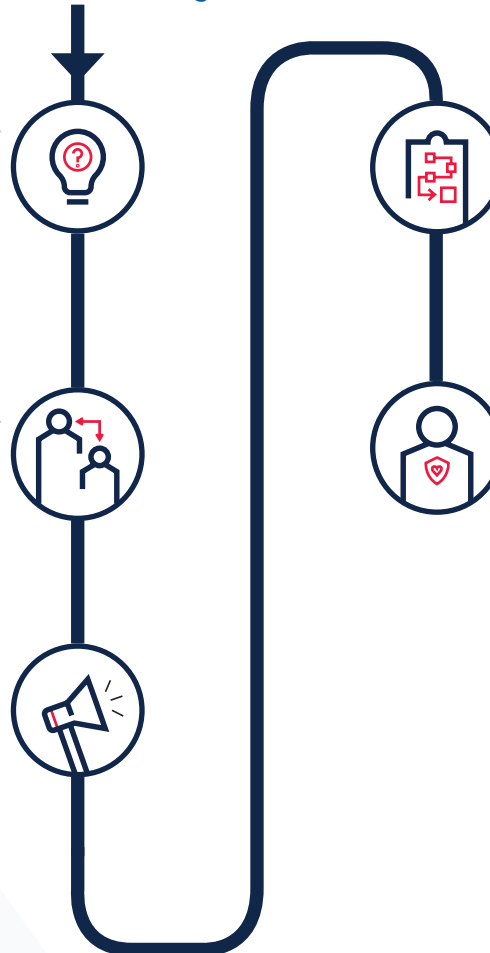
**Help People Speak Up**

**Our Actions**

- ✓ We are committed to high standards of conduct and ethical behaviour across the business to ensure that individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported. Our Whistleblowing Policy articulates the avenues which employees and other stakeholders can raise concerns of actual or suspected misconduct.
- ✓ We complete regular employee engagement surveys and regularly communicate with all employees through staff communications.

**Future Priorities**

**Continue** to communicate a speak up culture



**Respond to Exploitation**

**Our Actions**

- ✓ Where necessary be trained and prepared to remediate in line with Modern Slavery Policy.

**Future Priorities**

Be prepared to respond where required.

**Plan to Improve Over Time**

**Our Actions**

- ✓ Assessed our progress using the Property Council of Australia and Edge Impact Pathway to respecting Human Rights and Addressing Modern Slavery Risks' published in Marsh 2024 to assist in setting of FY24 priorities and to document our current progress and call out actionable steps against the identified 10 steps within the pathway.

**Future Priorities**

Map our progress annually to consider continuous improvement.



## Approval

This statement was made in accordance with Section 16 of the Modern Slavery Act 2018 (Cth) and was approved by Mulpha Australia Limited's board of directors on 29 May 2024 and is signed by Seng Huang Lee in his role as Chair of Mulpha Australia Limited.

Seng Huang Lee  
Chair  
Mulpha Australia Limited

**Mulpha Australia Limited**  
ACN 002 888 039

**Registered Office**  
Level 9, 117 Macquarie Street  
Sydney NSW 2000

[enquiry@mulpha.com.au](mailto:enquiry@mulpha.com.au)  
[www.mulpha.com.au](http://www.mulpha.com.au)



[ENQUIRY@MULPHA.COM.AU](mailto:ENQUIRY@MULPHA.COM.AU)  
[WWW.MULPHA.COM.AU](http://WWW.MULPHA.COM.AU)