

Modern Slavery Statement

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Issued by Aliro Group Pty Limited

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Revision No.	Revision Date	Revision Comments	Prepared By:	Approved By:
1	April 2020	Initial Version	Compliance Officer	N/A
1	July 2020	Revised Version	Sean Southon	Board

This Statement has been reviewed on April 2020.

This Statement will be reviewed every year. This Statement can be amended only with the approval of the senior management team or the Aliro Group Board, with the exception of minor amendments that do not affect the nature, substance or intent of the document.

1. Background

This document is a Modern Slavery Statement issued by Aliro Group Pty Limited (“Aliro”) in accordance with the *Modern Slavery Act 2018* (Cth) (the “MS Act”) with the approval of the Board of Aliro. It is anticipated that this Statement is registered with the Minister and available on the Modern Slavery Statements Register.

Aliro is an Australian company. It has elected to voluntarily comply with the MS Act under section 5(d) of the MS Act. Its decision to voluntarily comply is based on the goal of Aliro’s Board, staff and shareholders to support efforts to combat modern slavery in Australia and internationally and to support the 40 million victims of modern slavery worldwide.

2. Identify the reporting entity

Aliro holds an Australian Financial Services Licence (“AFSL”) no. 502179. It is a property company that raises capital from a range of wholesale clients. It operates property funds and seeks capital to invest in direct opportunities.

3. Describe the structure, operations and supply chains of the reporting entity

Aliro provides investment services and products to clients operating in both Australia and abroad. It is a service firm; it does not produce any goods to sell. However, in the context its operations, Aliro is exposed to modern slavery risk within supply chains. All of the assets managed by Aliro are real estate related. Some of these assets are in development phase and involve the procurement of significant construction and building materials. Aliro’s investments may similarly hold equity, debt or some other form of interests in assets that are producers of goods and services that have supply chain risk. In this way, the development of real estate assets managed by Aliro also pose supply chain risk. Aliro considers it has indirect exposure to supply chain risks (“**Indirect Risks**”).

4. Structure, operations and supply chains of the reporting entity

The risk of Aliro being directly exposed to modern slavery risk within its supply chain is moderate. In providing financial services, Aliro’s personal expenses (ie. things it spends money on in its supply chain) are dominated by staff costs, rent and other professional services (procured in Australia). However, Aliro has significant expenses associated with the development of real estate assets which it manages.

5. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls

There are risks that Aliro is indirectly connected to organisations that conduct or support modern slavery. Some examples of these risks include:

- Supply chains indirectly used by Aliro involve international firms that engages in modern slavery practices.
- A counterparty that is undertaking a building development acquires construction material from an offshore company that is employs modern slavery.
- A fund operated by Aliro receives investment from a company, or individual that perpetrates, supports modern slavery.

6. Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes

Aliro is committed to taking the following actions in respect of its operations:

- Ensuring that Aliro does not commence commercial arrangements with entities that have been found to breach the UN Guiding Principles on Business and Human Rights (UN Guiding Principles). If any existing commercial partner is found to have breached the UN Guiding Principles, Aliro will take steps to reassess whether it would continue to provide services with that commercial partner, and cease commercial relations unless a satisfactory rectification process is put in place.
- Ensuring that within its own direct supply chain, Aliro staff are trained on the MS Act and are aware of this statement. When Aliro procures goods above \$20,000 in value, it should assess whether the supplier has complied with the MS Act or global equivalent. If the supplier has not met obligations under the MS Act, a review will be undertaken to assess alternative suppliers.
- Ensuring third party contractors appointed by Aliro in the context of its operations are required to comply with the UN Guiding Principles requiring entities take responsibility to respect human rights in their operations and supply chains. This will be embedded in commercial contracts with contractors with the following clause; “The Trust will be operated in accordance with the UN Guiding Principles on Business and Human Rights.”

7. Describe how the reporting entity assesses the effectiveness of such actions

Aliro will provide its Board of Directors a half annual assessment on the implementation of the obligations of this Statement. The Board shall consider the effectiveness of the abovementioned measures and have the authority to amend this Statement as it sees fit.

8. Describe the process of consultation with:

- i. any entities that the reporting entity owns or controls; and
- ii. in the case of a reporting entity covered by a statement under section 14—the entity giving the statement

This is not applicable.

9. Include any other information that the reporting entity, or the entity giving the statement, considers relevant.

Not applicable.