

Modern Slavery Statement

Issue N°: 2 – June 2024
Issued by Aliro Group Pty Limited

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Revision Header

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
		Revised to include:		
2	June 2024	<ul style="list-style-type: none"> - Amendments to the Section 1: Background clarifying the nature of this statement as an online publication only. - Amendments to Section 6 to revise Aliro’s controls for addressing Modern Slavery risks. 	Compliance Officer	Board

This Statement has been reviewed in June 2024.

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 reference to the *Modern Slavery Act 2018* (Cth) (the “**MS Act**”) with the approval of the Board of Aliro.

Aliro is an Australian company and is not required to publish a Modern Slavery Statement per the MS Act. Instead, Aliro has elected to publish its Modern Slavery Statements on its website in line with Commonwealth Guidance for Reporting Entities. The decision to publish a statement 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. In conducting analysis and reporting to produce this statement, we note that Aliro’s financial reporting year runs from 1 July to 30 June, a financial year reporting cycle. This Modern Slavery Statement describes Aliro’s modern slavery considerations for the year ended 30 June 2025.

This statement has not been formally submitted to the Attorney-General’s Department as a voluntary statement.

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 in Australia 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 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:

- **Vendor Selection:** Prior to appointing outsourced service providers or commercial partners, a due diligence process is conducted to confirm these entities have processes in place to ensure staff comply with relevant laws and regulatory requirements including consideration of obligations within the MS Act. If any existing commercial partner is found to have breached the law, 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.
- **Vendor Agreements:** Ensuring modern slavery clauses are considered and have been built into Aliro's third-party contractor commercial agreements where possible. Agreement templates are reviewed on a periodic basis to ensure these clauses exist across the variety of Aliro templates.
- **External Risk & Compliance:** Aliro has engaged an external Risk & Compliance Consulting service – Evolution Fund Services Pty Ltd. This group is responsible for managing enterprise-level risk and compliance and prepares Aliro's Modern Slavery Statement and half-yearly assessment on the implementation of the Modern Slavery Statement. The Risk & Compliance team report to the Board on a quarterly basis and regulatory compliance risk (including the obligations associated with the MS Act) is a key part of Aliro's Enterprise Risk Register.
- **Code of Conduct:** Aliro has implemented a Code of Conduct. This Code promotes Aliro's philosophy of being, and being seen to be a 'good corporate citizen', by, among others, respecting the human rights of its Employees and only dealing with business partners who demonstrate similar ethical and responsible business practices. Integrity, accountability and transparency remain core values that form the basis of Aliro's decision-making.
- **Whistleblowing Policy:** Aliro's Whistleblowing Policy complements its Code of Conduct and shows its commitment to a culture in which individuals can raise their concerns regarding corporate misconduct, non-compliance with policies as well as the law. By facilitating the reporting of these concerns, Aliro aims to ensure that it maintains the highest standards of lawful and ethical behaviour.

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:

- any entities that the reporting entity owns or controls; and
- 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.
