

CLARK Property Partners Pty Ltd

ABN 68 641 858 737

t/as CLARK Commercial | CLARK Prestige | and associated divisions

CPP-POL-05

Modern Slavery & Human Rights Policy

Version 1.1 | June 2026 | Approved: Stephen Clark, Managing Director

Defined Term

CLARK Property Partners Pty Ltd (ABN 68 641 858 737) trading as CLARK Commercial, CLARK Prestige, and associated divisions and business names is referred to throughout this Policy as "**CPP**". All references to CPP in this document apply to the entire organisation including all trading divisions, business names, personnel, directors, contractors and agents acting on behalf of CPP.

Legislative Context

This Policy reflects CPP's obligations under the Modern Slavery Act 2018 (Cth), the Modern Slavery Act 2018 (NSW), and the crimes outlined in Divisions 270 and 271 of the Criminal Code Act 1995 (Cth) — including forced labour, child labour, human trafficking, debt bondage, forced marriage and other slavery-like practices.

01 Policy Statement

1. Policy Statement

CLARK Property Partners Pty Ltd (ABN 68 641 858 737) trading as CLARK Commercial, CLARK Prestige, and associated divisions and business names ("CPP") has zero tolerance for modern slavery in any form — within CPP's own organisation, its supply chains, and the assets and communities it manages. CPP recognises that property services operations — including construction, cleaning, security, landscaping, FM services and hospitality — can involve supply chain categories with elevated modern slavery risk. This Policy sets out how CPP identifies, prevents and responds to modern slavery risk.

02 Scope

2. Scope

This Policy applies across all CPP divisions — CLARK Commercial (sales, leasing, property management), CLARK Prestige (residential sales and management), and Marketing — and to all contractors, suppliers and service providers engaged by CPP or on behalf of CPP's managed assets.

03 Risk Identification

3. Risk Identification

CPP will identify modern slavery risks by:

- Conducting due diligence on all new suppliers and contractors prior to engagement — assessing their modern slavery policies, employment practices and supply chain controls
- Applying heightened scrutiny to higher-risk service categories including cleaning, labour-hire, building materials, food and beverage supply, and security services
- Including modern slavery compliance representations as a contractual condition of engagement for all contractors and service providers
- Reviewing existing supplier relationships periodically for emerging modern slavery risk
- Monitoring contractor conduct at managed assets — CPP's regular site presence across its managed portfolio provides meaningful visibility of on-the-ground working conditions

04 Due Diligence & Supply Chain Controls

4. Due Diligence & Supply Chain Controls

CPP's supply chain due diligence framework requires:

- A modern slavery compliance declaration from all contractors and service providers before engagement
- Contractual rights to audit supplier and contractor compliance with modern slavery obligations
- Contractors to flow down modern slavery compliance obligations to their own subcontractors and suppliers
- Evidence of fair wages, lawful employment arrangements and safe working conditions as part of contractor qualification
- Termination of supplier relationships where modern slavery risk cannot be adequately mitigated

05 Reporting & Response

5. Reporting & Response

CPP will respond to identified modern slavery risks promptly and transparently:

- Any actual or suspected modern slavery concern must be reported to the Managing Director immediately
- CPP will notify the relevant client in writing of any modern slavery concern arising at a managed asset as soon as practicable
- Where a concern is confirmed, CPP will remediate — including terminating supplier relationships, engaging authorities and supporting affected individuals
- CPP will report annually on its modern slavery risk assessment and the effectiveness of its due diligence measures
- CPP will not tolerate retaliation against any person who reports a modern slavery concern in good faith

06 Broader Human Rights

6. Broader Human Rights

Beyond modern slavery, CPP respects all internationally recognised human rights including:

- The right to safe and fair working conditions for all workers in its supply chain
- Freedom of association and the right to collective bargaining
- The elimination of child labour in all its forms
- Non-discrimination and equal treatment in employment

Stephen Clark

Managing Director

CLARK Property Partners Pty Ltd

June 2026

Version 1.1

Review Due: June 2027

Policy Owner: Managing Director, CPP