



2025 Modern Slavery Statement



Supporting better communities
through life's essentials.



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Reporting Entity

The Reporting entity of this Modern Slavery Statement is Region Group (“**Region**”) which comprises Region Management Trust, Region Retail Trust (together, “**Trusts**”), Region RE Limited (“**Region RE**”) and any entities owned and/or managed, either beneficially or legally, by the Trusts or Region RE for the financial year ending 30 June 2025. It also includes reference to some actions which have occurred after 30 June 2025. Where such actions have been included, the timing has been noted.

Letter from the CEO

At Region, our purpose is supporting better communities through life’s essentials. This continues to guide our actions and shape our commitment to addressing modern slavery. This purpose inspires us to drive positive change and foster environments that enhance the well-being of our stakeholders.

We acknowledge that our operations influence the lives of many, and we are dedicated to ensuring that this influence is constructive and responsible. As part of this commitment, we strive to create spaces that support the health, safety, and dignity of all those connected to our business.

We also recognise our duty to proactively identify and mitigate any risks of unintentional harm arising from our activities. A key aspect of this responsibility is our ongoing focus on understanding and managing modern slavery risks, an integral part of our broader commitment to human rights.

Modern slavery remains a complex and evolving issue that spans industries, supply chains, and geographies, particularly where vulnerable populations are most at risk. At Region, we remain firmly committed to ensuring that all work associated with our operations is carried out freely and ethically, without any involvement in slavery, servitude, forced labour, or human trafficking.

We view our supplier relationships as a vital opportunity to promote responsible and ethical conduct. By working collaboratively, we aim to uphold standards that reflect our values and reinforce our dedication to human rights across our supply chain.

During the reporting period, Region:

- conducted a review of our active supplier risk map, categorising suppliers to better understand the inherent modern slavery risks within our supply chain;
- monitored compliance with our Supplier Code of Conduct, which is specifically designed to support the identification and management of modern slavery risks;

- continued the use of supplier engagement contract templates to address modern slavery risks within contractual arrangements with suppliers and service providers;
- provided all employees with modern slavery awareness training;
- included modern slavery requirements as part of the selection criteria in procurement processes and service contracts; and
- awarded new national contracts for cleaning and security services in the second half of FY25. The supplier selection process included specific modern slavery criteria within the evaluation matrix, ensuring potential suppliers were assessed on their approach to managing these risks. Modern slavery clauses were embedded in the new cleaning and security contracts.

This year’s Modern Slavery Statement reflects Region’s continued commitment to enhancing its capabilities and establishing a strong foundation for future initiatives. Building on the progress outlined in previous statements, it demonstrates our evolving understanding of modern slavery risks across our operations and supply chain, and details the measures we have implemented to address these risks effectively.



A. Mellows

Anthony Mellows
Chief Executive Officer

Region’s Structure, Operations and Supply Chain

REGION’S STRUCTURE

Region comprises two registered managed investment schemes: Region Management Trust (ARSN 160 612 626) and Region Retail Trust (ARSN 160 612 788). The securities in each Trust are stapled to form the stapled listed vehicle, Region Group. Region is listed on the Australian Securities Exchange (ASX) under the code “RGN”.

Region is internally managed, which allows alignment of management interests with the interests of security holders. Region RE is the responsible entity of Region Management Trust and Region Retail Trust. Region RE is a wholly owned subsidiary of Region Management Trust.

Region RE as Responsible Entity of Region Retail Trust owns 20% of SCA Metro Convenience Shopping Centre Fund and Matrix Trust (collectively, Metro Fund), a joint venture with a global institutional investor.

REGION’S OPERATIONS

Region’s core strategy is to invest in a geographically diverse portfolio of convenience-based retail properties. The portfolio is focused on the non-discretionary retail sector and is anchored by long term leases to quality tenants. Region’s operations include the management, leasing, acquisition, tenancy delivery, development and disposal of retail shopping centres undertaken by an in-house team of property professionals.

Since listing on the ASX in 2012, Region has completed a number of acquisitions and divestments and at 30 June 2025, owned 87 convenience-based shopping centres in Australia with a total value of \$4,374m.

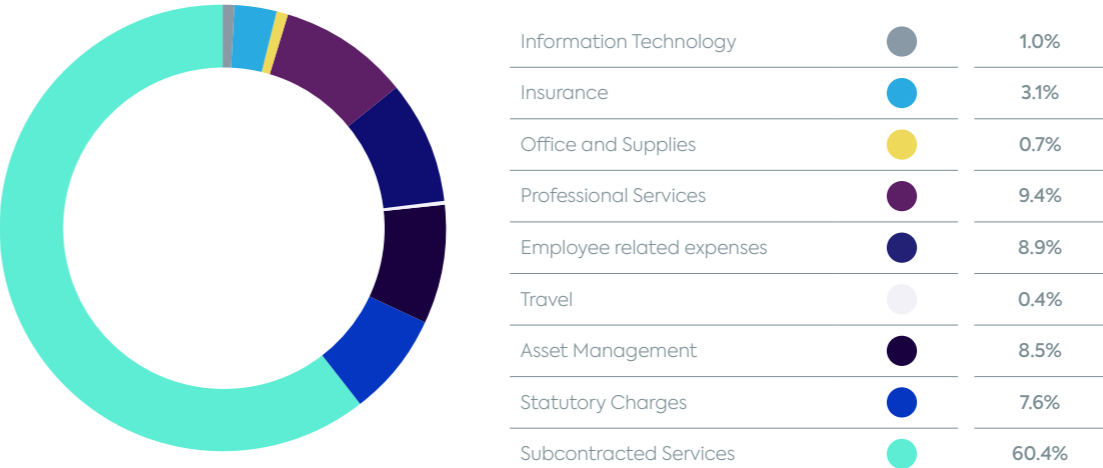
At 30 June 2025, Region had 123 anchor tenants with the majority comprising of Woolworths Group, Coles Group and Wesfarmers Group stores. Anchor tenants accounted for 46% of Region’s gross rent for the year ended 30 June 2025, with specialty tenants accounting for 54%. Region also manages Metro Fund which comprises 13 properties with a total value of \$711.5m.

REGION’S SUPPLY CHAIN

Region relies on a large number of suppliers to execute its business activities of which the vast majority operate in Australia. Region’s supply chain comprises products and services generally grouped into the following categories:

- **Property Operations** – external service providers providing a range of operational services including external property management services, sustainability, cleaning, security and office equipment.
- **Corporate** – external service providers providing a range of professional services including unit registry services, banking and financial services, information technology, payroll, property valuation, travel, recruitment, audit, compliance, sustainability, custodial services and specialist advice such as legal and tax.
- **Property Development** – external service providers providing a range of services including development management, design and construction.

TOTAL SPEND BY CATEGORY



Risks of modern slavery in Region’s operations and supply chain

OPERATIONAL RISKS

Region has assessed the risk that it causes, contributes to or is directly linked to modern slavery. As in the prior reporting period, it has assessed the risk in its direct operations as low, with no instances of modern slavery having been identified.

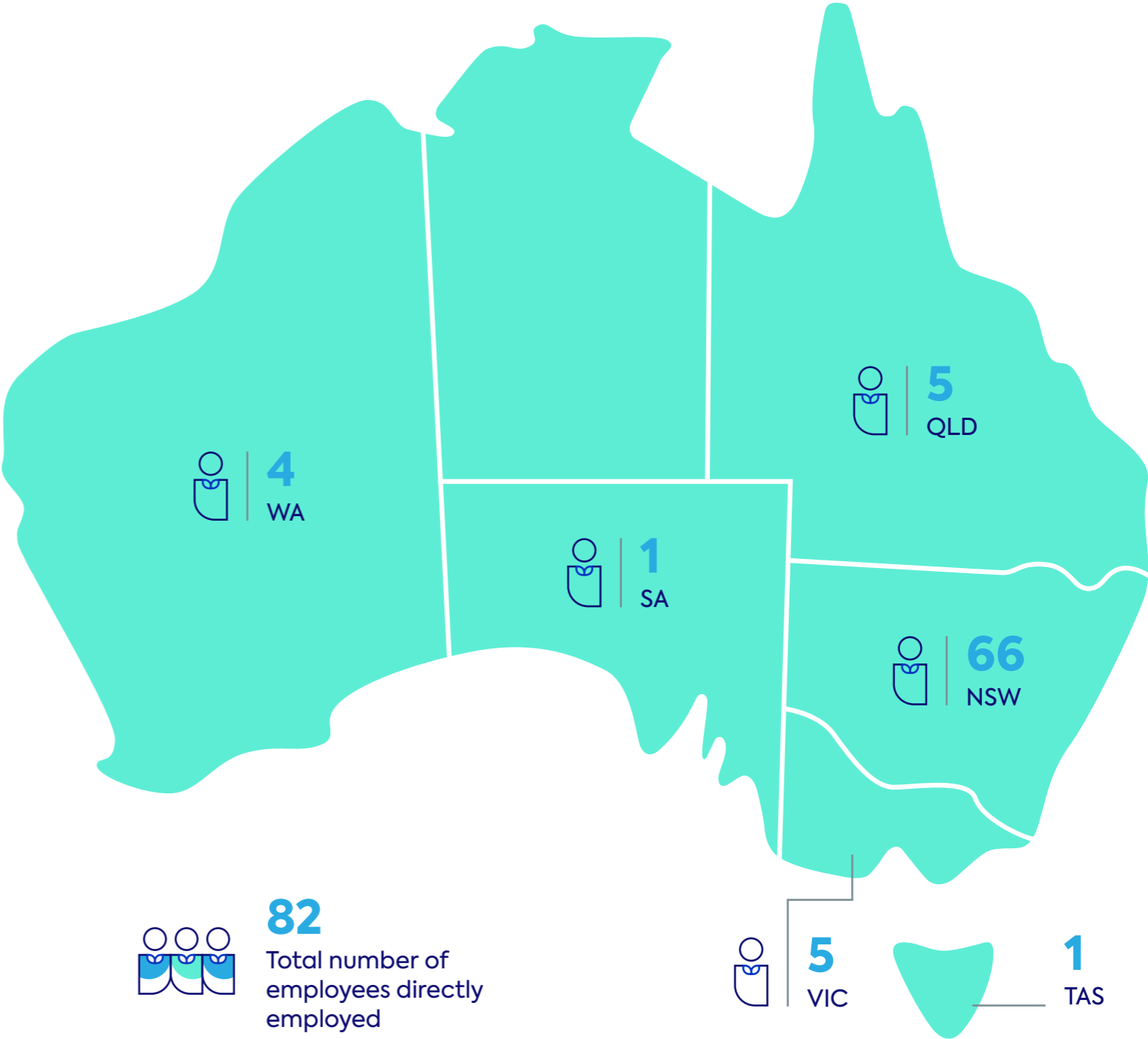
Region has a small workforce of 82 people operating exclusively in Australia and all staff are employed in accordance with Australian workplace law. We have offices in New South Wales and Victoria, with employees also working remotely from Queensland and Western Australia. Each of these jurisdictions have strong employment workplace health and safety and anti-discrimination laws which Region must comply with. The majority of its workforce is in the corporate office in New South Wales.

Region’s workforce is predominantly made up of trained professionals with 100% permanently employed.

Region acknowledges the following risks in relation to the management of its employees:

- (i) deficient employee grievance mechanisms could reduce Region’s ability to identify and remediate modern slavery risks; and
- (ii) inadequate modern slavery training could reduce the effectiveness of Region’s policies and grievance mechanisms to manage the risk of exploitation.

See page 10 for measures taken to assess and address these risks.





SUPPLY CHAIN RISKS

Region considers that there will be people in its supply chain who are at higher risk of modern slavery than its direct workforce.

In FY25, Region directly engaged approximately 500 suppliers. Region’s supply chain comprises suppliers that provide a wide range of services and products, including construction, property management (such as facilities management, cleaning, security, and plumbing), energy retail, legal services, financial services, and professional consultancy. All suppliers engaged by Region are based in Australia.

Region conducts supplier chain risk assessment by drawing on guidance published by the AS ISO 20400 Sustainable Procurement Standard, suppliers were assessed against four key risk indicators:

- **Location of product or service** which included the consideration of the right of freedom of association, health and safety procedures, occurrence of discrimination and average living conditions.
- **Industry sector** which included the consideration of recruitment practices and the termination of employment, employment profile (reliance on low-skilled and/or migrant workers), living wage and existence of grievance mechanisms.
- **Supplier relationship** which included the consideration of the duration of the relationship, the level of oversight and the value of the contract.
- **Existing information** which included the consideration of suppliers having an ethics/ whistleblower policy, existence of a code of conduct, non-compliances with policies and other factors that are indicators of modern slavery, and media or non-governmental organisation reports indicating possible problems with labour standards.

Region then categorised the suppliers by industry sector and assigned a modern slavery risk rating, based on the following risk scoring which draws upon the Social Responsibility Alliance’s Global Slavery and Trafficking Risk Template, which identifies industries with elevated risks of human trafficking.

Risk ratings range from 1-5, with 5 representing the highest risk level

Score	Risk Rating	Type of Supplier
5	Significant	Low level of skill and migrant workers
4	High	Lower level of skill
3	Moderate	Uncertainty over level of knowledge/skill
2	Low	Licensed Professionals
1	Very Low	Highly Professional and Skilled

Region has invited selected participants within its supply chain to complete a Modern Slavery Questionnaire or, alternatively, to provide their own Modern Slavery Statements.

For suppliers who did not respond, a high-level risk assessment was conducted to identify potential reasons for non-responsiveness. Where appropriate, further follow-up actions were undertaken to address any concerns or gather additional information.

Across Region’s assessments, the suppliers identified as having a potentially significant modern slavery risk were primarily in the cleaning, security and facilities management industry sectors.



Measures taken to assess and address risks of modern slavery in Region's business

PREVENTING MODERN SLAVERY IN REGION'S OPERATIONS

Region is committed to upholding the rights of its employees through its internal employment policies and practices. The rights of all employees are addressed in Region's Code of Conduct, Diversity and Inclusion Policy, Employee Handbook and Human Resources Policies and Procedures, which includes the Workplace Health and Safety Policy. Employees are informed of their rights through a variety of channels including employment contracts, induction sessions and ongoing training.

In accordance with applicable employment laws, Region is required to ensure that all employees meet minimum age requirements. This is supported by comprehensive pre-employment screening checks conducted for each employee. Region does not employ individuals under the age of 18, thereby eliminating the risk of association with child labour in its operations. Occasionally, Region offers work experience opportunities to high school students upon request. These individuals are not classified as employees and are managed carefully to ensure their experience is educational and free from exploitation.

Region fosters a culture of open communication, encouraging the reporting of concerns at all levels. Given the small size of Region's workforce, all employees have direct access to the senior management team, including the Chief Executive Officer, Chief Financial Officer and Chief Operating Officer allowing employees to raise any issues or concerns directly and transparently to senior management team.

All employees, as well as third parties, have access to an authorised 24-hour whistleblower hotline through which they can raise concerns related to improper conduct, including unethical business practices, in confidence and without fear of recrimination.

Modern slavery training is provided to all employees alongside training on key internal policies such as the Code of Conduct, Whistleblower Policy and Procedure, Workplace Health and Safety Policy, and Diversity and Inclusion Policy. Completion of this training is tracked and monitored by Region.

While the risk of modern slavery in Region's operations is considered low, Region recognises the importance of maintaining an effective grievance mechanism. Any instances requiring remediation of harm would be addressed through the appropriate internal employment policies. This would include formal investigations in accordance with Region's Whistleblower Policy and Procedure where required. The Whistleblower Policy and Procedure is available on the Region website and is therefore accessible to all employees to utilise.

PREVENTING MODERN SLAVERY IN REGION'S SUPPLY CHAIN

- Region's Outsourcing Policy and Procedure, and Procurement Policy and Procedure require that a procurement review be conducted at the initiation of a project or upon identifying the need to engage a key third-party supplier.
- Region's Procurement Policy and Procedure outlines the process for engaging suppliers. This includes the requirement for suppliers to be engaged using Region's standard supplier engagement template contracts. These contracts mandate compliance with the Modern Slavery Act of 2018 ("The Act") and adherence to Region's Supplier Code of Conduct. The minimum requirements set out in these contracts include a prohibition on modern slavery, Region's right to request information, an obligation for suppliers to notify Region of any contractual breaches, and Region's right to terminate the contract for non-compliance. A number of the more major works and services template contracts go further by

requiring suppliers identified by Region as having a potentially higher risk of modern slavery to develop and implement appropriate policies and processes to detect and address modern slavery. These suppliers must also provide reasonable modern slavery related training and awareness programs for their personnel.

- Region's supplier selection process is not limited to cost competitiveness; it also requires consideration of issues relating to environmental sustainability, social responsibility, workplace health and safety standards, relevant certifications and licenses, and modern slavery.
- Region's Supplier Code of Conduct outlines Region's expectations for suppliers across a range of issues and includes the need to promote and respect human rights by working to prevent child or forced labour and human trafficking in their operations and supply chains. The Supplier Code of Conduct includes a specific reference to The Act and requires suppliers to meet the following minimum requirements:
 - adopt sound labour practices and treat its workers fairly in accordance with applicable laws and regulations;
 - refrain from using any form of forced labour, including prison labour, indentured labour, bonded labour, or other forms of coercion;
 - refrain from engaging in any act that constitutes modern slavery;
 - take commercially reasonable steps to prevent its own subcontractors and suppliers from engaging in any acts that constitutes modern slavery; and
 - notify Region if the supplier or any of its subcontractors identifies any instance of modern slavery.
- Region's Supplier Code of Conduct can be found at regiongroup.au.
- Prior to entering into a new third-party supplier relationship under the Outsourcing Policy and Procedure or the Procurement Policy and Procedure, the employee designated as the Responsible Person (as defined in the Outsourcing Policy) must initiate due diligence on the potential key supplier. This includes reviewing the supplier's compliance with applicable laws and regulations, particularly those that impose ethical standards on suppliers. A subsequent risk management assessment of the supplier is conducted to determine the appropriate level of ongoing monitoring.
- The level of oversight applied on a supplier is determined by the outcome of the supplier's risk assessment.
- The risk of modern slavery has been identified in asset operational procurement. Accordingly, once a contract with a third-party supplier is entered into, the employee with responsibility for the supplier relationship is accountable for:
 - monitoring the supplier against the terms of the contract and service level agreements; and
 - documenting and reporting any legal issues or other incidents that arise.
- If a supplier is found to be in breach of its contract with Region, including any breach of the Supplier Code of Conduct, Region may look to exercise its contractual rights against that supplier and/or engage with the supplier to remediate the breach.
- During the reporting period, Region sent a due diligence questionnaire to 40 of its suppliers to assess whether they were required to submit modern slavery statements under the Act and to ascertain the suppliers' approaches to addressing modern slavery within their operations and supply chains. For the 12 suppliers that have not responded, 5 of them are no longer in our supply chain. Whilst for the remaining 7 suppliers, we continued to evaluate through public information such as published Modern Slavery Statements. Of those suppliers for which Region has statements for FY24, it believes they are low risk and are likely in the process of preparing their own FY25 statements. In future reporting periods, Region will continue to engage with its suppliers to mitigate the risk of modern slavery, by encouraging suppliers to implement their own measures to minimise the risk of slavery and human trafficking within their organisations and supply chains.

Assessing effectiveness

- Region is committed to the continuous improvement of its processes and procedures implemented to address modern slavery risks within its operations and supply chain, acknowledging that this is an ongoing and evolving process.
- Region measures its effectiveness by:
 - conducting annual reviews of its modern slavery approach and the effectiveness of its supplier identification process under AS ISO 20400 Sustainable Procurement Standard;
 - monitoring suppliers’ performance in accordance with service level agreement, including the implementation of any required corrective actions; and
 - tracking ongoing engagement with suppliers beyond the initial risk assessment to identify potential process improvements.

SPECIFIC OUTCOMES INCLUDE	STATUS
Training employees on modern slavery	Completed in FY25
Inclusion of modern slavery clauses in all supplier engagement contracts	Included in all renewals and new supplier engagements in FY25
Review of all suppliers to identify and prioritise potential modern slavery risk	Completed in FY25
Encouragement of prompt reporting of incidents and modern slavery concerns in Region’s operations and supply chain	Ongoing – no incidents observed or reported in FY25
Region’s Whistleblower Policy and Procedure offers protections to individuals to raise modern slavery concerns directly with Region	Ongoing – no incidents observed or reported in FY25
Review procurement strategy for inclusion of supply chain accountability frameworks and consider roadmap for implementing	Implemented as part of Procurement Procedure policy in FY25
Enhance the procurement process to include modern slavery requirements in the selection criteria	In FY25, Region awarded new national contracts for cleaning and security services. The supplier selection process included specific modern slavery criteria within the evaluation matrix, ensuring potential suppliers were assessed on their approach to managing these risks. Modern slavery clauses were embedded in the new cleaning and security contracts.

Consultation

Region RE and the two stapled Trusts consult on Modern Slavery. All actions taken in this reporting period were taken by and on behalf of Region RE and the Trusts as a group. This will continue as Region seeks to achieve its FY26 objectives.



Action plan for future reporting periods

- Region recognises that modern slavery is a complex and evolving issue. We are dedicated to upholding and promoting human rights through robust practices and policies that reflect this commitment. Region understands that addressing modern slavery requires ongoing reassessment and adaptation in response to shifting global conditions and regulatory landscapes. We are dedicated to engaging with a diverse range of stakeholders to address these critical issues actively and responsibly.
- Region's FY26 objectives include:
 - continual refinement of the procurement strategy to strengthen supply chain accountability frameworks;
 - ongoing review and enhancement of the supplier risk map to better identify and manage potential risks;
- continued identification and assessment of supply chain risk;
- ongoing engagement with suppliers to raise awareness of modern slavery risk and promote responsible practices;
- providing ongoing staff training to build understanding of modern slavery risks and their practical implications; and
- auditing a sample of suppliers selected through the procurement process.
- The purpose of this Statement is to provide general information only as required by the Act and is correct as at the date of publication.
- This Statement was approved by the Board of Region RE Limited, the responsible entity of Region Management Trust and Region Retail Trust on 16 December 2025.



Appendix

The below table identifies where each mandatory reporting criterion set out under the Act is disclosed within this Statement.

Identify the reporting entity	Page 2 Reporting Entity
Describe the reporting entity's structure, operations and supply chains	Page 4 Region's Structure, Operations and Supply Chain
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Pages 6-9 Risks of modern slavery in Region's operations and supply chain
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Pages 10-11 Measures taken to assess and address risks of modern slavery in Region's business
Describe how the reporting entity assesses the effectiveness of these actions	Page 12 Assessing effectiveness
Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Page 13 Consultation
Provide any other relevant information	Page 3 Letter from CEO

