

Modern Slavery Statement

2025

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About this statement

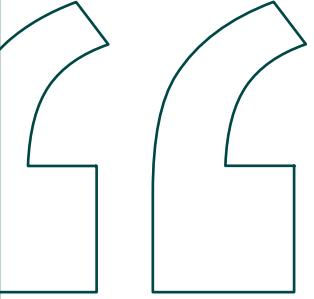
This is Haben's first Modern Slavery Statement, published in accordance with the Modern Slavery Act 2018 (Cth) (the Act) for the financial year 2025.

This Statement provides an overview of Haben's approach to modern slavery, which includes our responses to the Mandatory Criteria as outlined in Section 16 of the Act.

This Statement was approved by the Haben Board, in its capacity as the principal governing body, on 26 November 2025, and was signed by Ben Finger in his role as Managing Director & Co-Founder on 5 December 2025 in accordance with section 13(2)(c)-(d) of the Act.



Managing Director & Co-Founder Message



When my father, Harold Finger, and I co-founded Haben, we wanted to create a business that not only delivered strong commercial outcomes but also reflected our shared belief in doing the right thing—acting responsibly, learning continuously, and working together as a community.

Today, as a newly reporting entity under the Modern Slavery Act (2018), I am proud to lead Haben in this important step toward being an advocate for human rights and contributing to the eradication of modern slavery.

This first Modern Slavery Statement represents more than compliance; it reflects our aspiration to make a positive impact within Australia and across the global supply chains that support our business. Modern slavery is a complex issue, and we are committed to raising awareness, actively seeking to identify risks, and partnering with others to eliminate harm wherever we find it.

We approach this journey with humility and openness to learning. While we do not have all the answers today, we are determined to continually improve, embed best practices, and act with integrity in everything we do. By fostering collaboration and shared responsibility, we aim to create a culture that champions human rights and ensures dignity and fairness for all.

Thank you for joining us on this important journey. Together, we can make a meaningful difference.



Ben

Ben Finger
Managing Director & Co-Founder
Haben

Overview Criterion 1

Reporting Entity



This Statement is submitted in accordance with the *Modern Slavery Act 2018 (Cth)*. It represents **Haben's first Modern Slavery Statement**.

The Statement has been prepared and issued by **Haben Property Fund Limited (ABN 89 139 914 775)**, as the responsible entity for all reporting entities within the Haben Group.

Throughout this document, references to "**Haben**", "**Haben Group**", "**we**", or "**our**" refer collectively to **Haben Property Fund Limited** and the trusts and entities it owns or controls that fall within the scope of this Statement.

This Statement outlines the approach taken by Haben to understand, identify, manage, and mitigate the risks of modern slavery within our operations and supply chains. It reflects our commitment to ethical business practices, human rights, and continuous improvement in governance and risk management.

As a fully integrated property investment and management group, Haben recognises its responsibility to ensure that modern slavery risks are addressed not only within our direct operations, but also across the broader network of suppliers, contractors, and partners that support our shopping centre portfolio.

Criterion 2

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

Haben is a fully integrated Australian property investment and management company, founded in 2009 by Harold and Ben Finger. We specialise in retail property, with a focus on delivering long-term value for investors, tenants, and the communities in which our shopping centres operate.

Our first reporting period under the *Modern Slavery Act 2018 (Cth)* is the financial year ending 30 June 2025.

As at the end of this period, Haben managed over:



\$3 billion in assets

across



13 shopping centres

located in



New South Wales, Queensland, and Victoria.

Structure

Haben employees are employed by Haben Property Fund Ltd (ABN 89 139 914 775). All operations and staff are based in Australia. As at 30 June 2025, Haben employed:



127 Full-time staff



3 Part-time staff



2 Casual staff

2 Part-time | Fixed Term



Criterion 2 continued

Each shopping centre is owned by a special purpose vehicle, typically structured as a wholesale unit trust. Haben either wholly owns or co-owns each asset and each holding trust.

Haben Management Pty Ltd as trustee for Haben Retail Management Unit Trust (ABN 91 873 552 898) manages each asset and also Haben's head office.

As at 30 June 2025, our assets include:



All assets are managed by **Haben Management Pty Ltd** as trustee for The Haben Retail Management Unit Trust ABN 91 873 552 898.



Operations

Haben and its associated Trusts operate as integrated property investment and management entities, specialising in the ownership and management of shopping centres across Australia. Our operations are conducted entirely in-house, encompassing asset management, property management, leasing, marketing, facilities management, and development oversight.

We act as landlords to a diverse range of tenants, including some of Australia's largest national retail chains, independent retailers, and service providers. Our portfolio includes both metropolitan and regional centres, reflecting a broad footprint across the Australian retail landscape.

Nature and Types of Activities

Our core activities include:

- **Property ownership and investment** through various Trust structures.
- **Shopping centre management**, including leasing, tenant relations, and operational oversight.
- **Development and refurbishment** of retail assets to enhance tenant and customer experience.
- **Facilities and maintenance management**, ensuring compliance with safety, environmental, and operational standards.

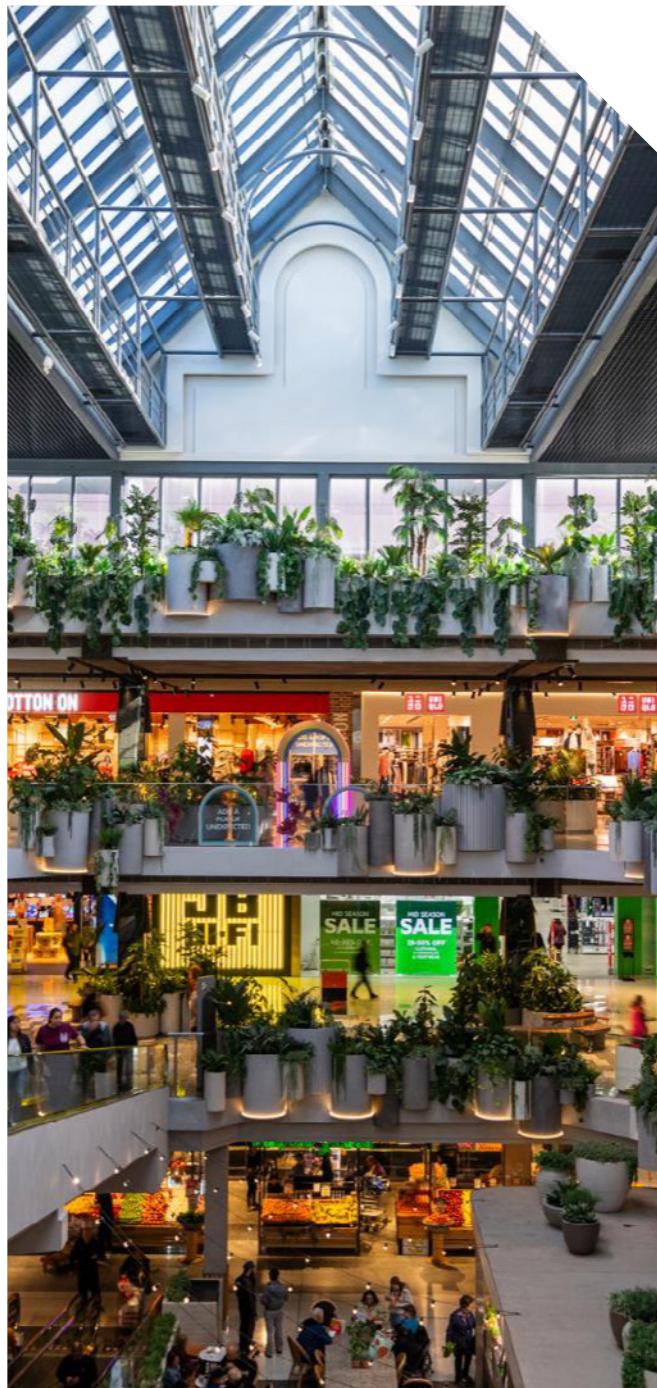
The Trusts we manage are structured to hold and operate retail assets, and Haben acts as the responsible entity or trustee for these investment vehicles.

We manage all aspects of shopping centre management in-house. Through our current shopping centre assets we are operating as landlord for some of Australia's largest retail chain businesses.

Criterion 2 continued

Investment

Haben investment activities are focused on acquiring, developing, and managing retail property assets. These investments are made through Trust structures, which in some instances leverage capital from institutional and private investors. Investment decisions are guided by long-term value creation, sustainability principles, and risk management frameworks.



Supplier Arrangements

We engage a range of suppliers to support our operations, including:



Facilities management and maintenance providers



Cleaning and security services



Construction and refurbishment contractors



Marketing and promotional service providers

Supplier relationships are generally structured through formal contracts, with a mix of short-term and long-term engagements depending on the nature of the service. For critical services such as cleaning and security, we aim to establish stable, long-term partnerships to ensure consistency, quality, and compliance with ethical sourcing standards.

Other Business Relationships

In addition to suppliers, Haben maintains relationships with:

- **Joint venture partners** in certain property developments or acquisitions.
- **Institutional investors and fund managers** who participate in our Trust structures.
- **Local councils and government agencies**, particularly in relation to planning, compliance, and community engagement.

Criterion 3

Describe the risks of modern slavery in the operations and supply chains of the reporting entity

Haben recognises that modern slavery risks may be present in both its operations and extended supply chains.

These risks vary in nature and severity depending on sector characteristics, product types, geographic sourcing, and the governance practices of entities within the supply chain.

Sector and Industry Risks

As a retail property owner and manager, Haben operates in sectors that intersect with industries globally recognised as high-risk for modern slavery. These include:

- **Cleaning and security services**, which are commonly outsourced and involve low-paid, manual labour often performed by migrant workers or casual staff.
- **Construction and maintenance**, where subcontracting practices and complex labour arrangements can obscure visibility into working conditions and employment practices.
- **Retail tenants**, particularly those in fashion, electronics, and food sectors, may source products from high-risk industries such as textiles, agriculture, and manufacturing.

These are well known sector and industry risks in the Australian property and development industry.

Product and Services Risks

Haben's supply chain includes products and services that carry elevated modern slavery risks due to their production methods or labour intensity:

- **Cleaning supplies, uniforms, and promotional materials** may involve cotton, rubber, and plastics sourced from regions with known labour exploitation.
- **Construction materials** such as bricks, steel, and timber may originate from countries with limited labour protections.
- **Security services** often involve night shifts and casual labour, increasing vulnerability to exploitation.

These risks are consistent with those identified by our industry peers. Throughout FY26 we will be reviewing how supplier screening and grievance mechanisms can support a more robust risk management approach.



Geographic Risks

While Haben's direct operations are based in Australia, its supply chain may extend to countries with higher modern slavery risks due to:

- **Weak governance and enforcement of labour laws**
- **High levels of poverty and migration**
- **Conflict or political instability**

In particular, products from Southeast Asia and South Asia may present elevated modern slavery risks due to the prevalence of low-cost manufacturing, informal labour arrangements, and limited oversight in supply chain tiers. These regions are commonly associated with the production of textiles, electronics, construction materials, and cleaning supplies—categories that may be indirectly linked to Haben's operations through contracted services, tenant fit-outs or products sold by our tenants.

Entity Risks

Modern slavery risks may also arise from the governance practices of suppliers and subcontractors. These include:

- **Lack of transparency in labour practices**
- **Poor worker protections or history of human rights violations**
- **Use of subcontracting without oversight**

Haben acknowledges the importance of robust supplier engagement and has begun implementing measures aligned with industry best practices. These are addressed at Criterion 4.

Criterion 4

Describe the actions taken by the reporting entity to assess and address these risks, including due diligence and remediation processes

As part of its first reporting year under the Modern Slavery Act (Cth 2018), Haben has laid the foundations for a structured and proactive approach to identifying, assessing, and addressing modern slavery risks across its operations and supply chains.

While some initiatives are in early stages, Haben is committed to maturing its response over time through continuous improvement and stakeholder engagement.

Identifying and Assessing Risks

Haben has undertaken a structured approach to identifying and assessing modern slavery risks across its operations and supply chains. This process included **desktop research at both national and international levels**, focusing on known risk indicators such as geographic sourcing, labour-intensive service categories, and vulnerable workforce groups.

We drew on **sector-specific insights** from the **Property Council of Australia**, including its *Indicators of Vulnerability to Modern Slavery in Property and Construction* guide, which highlights high-risk areas such as cleaning, security, and construction services.

In addition, Haben conducted **peer benchmarking** against leading property groups including **Charter Hall, Vicinity Centres, Westfield, and Lendlease**, reviewing their published Modern Slavery Statements to understand common risk exposures and mitigation strategies. This comparative analysis helped us identify gaps and opportunities to strengthen our own approach.

We also reviewed guidance from the **Shopping Centre Council of Australia**, which clarified that while landlords are not responsible for reporting on lessee supply chains, they must still assess risks within their own operations and contracted services.

This multi-layered assessment has informed our prioritisation of high-risk procurement categories and guided the development of targeted actions, including supplier engagement, contract reviews, and internal training.

Integrating Findings and Taking Action

Haben has integrated its risk findings across the organisation and taken appropriate action to address identified impacts:

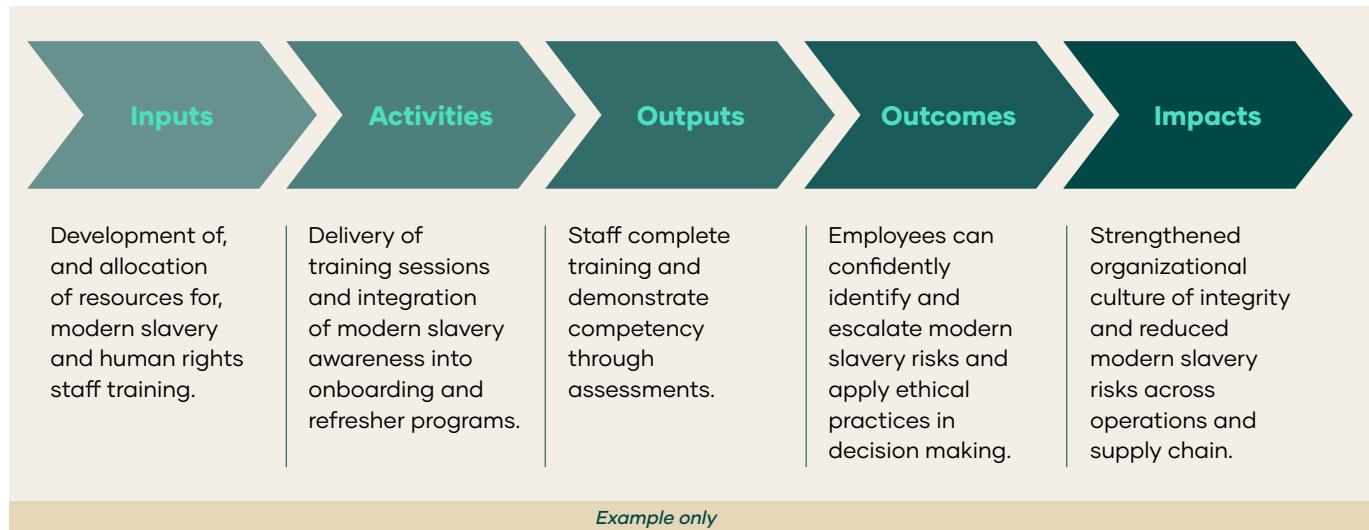
- **Mandatory modern slavery training** has been released to all Haben staff, with full completion targeted for 2026. This training builds awareness of modern slavery indicators, reporting mechanisms, and ethical procurement practices. Haben is targeting a 100% completion rate to ensure consistent understanding and accountability across the organisation.

- **Modern slavery clauses** have been embedded into contract templates and applied during the renewal of Haben's portfolio-wide cleaning and security services tender. These clauses require suppliers to uphold ethical labour standards and provide transparency in workforce arrangements. We will be embedding modern slavery clauses into all supplier contracts, tailored to the level of risk and proportionate to the scale of spend, ensuring they remain fit for purpose across our procurement activities.
- **Modern slavery provisions have been integrated into Haben's Code of Conduct**, which applies to both staff and suppliers. This update reinforces our expectations around ethical behaviour, human rights, and responsible sourcing.
- **Haben's Whistleblower Policy has been updated** to explicitly include modern slavery and human rights violations as reportable concerns, encouraging employees to confidentially report suspected instances of forced labour, exploitation, or unethical practices without fear of retaliation.
- **Spot checks with contracted security and cleaning staff** are undertaken across our Centres to verify employment status and conditions (e.g. direct or subcontracted). We do this to ensure staff are employed fairly, and to flag any perceived risk of unauthorised subcontracting or unethical employment arrangements.
- **Haben has adopted a Human Rights Policy** that aligns with our business values. It forms the foundation for modern slavery training, helps our people understand why we've introduced new contract clauses, and explains the inclusion of modern slavery in our Supplier Code of Conduct and Whistleblower Policy. This Policy reinforces our values of *striving for continual improvement, acting with integrity and working as a community* by ensuring everyone understands human rights and modern slavery risks, and works together to uphold dignity and fairness across all aspects of our operations.

Criterion 4 continued

Tracking Performance

To ensure that actions are effective, the development of a Modern Slavery Management Plan is underway. This will use the Property Council of Australia 'Impact Metrics for Addressing Modern Slavery' as a guide to establishing clear performance and impact metrics, based on the below framework:



This plan will guide the implementation of actions across the business, assign responsibilities, and establish a six-monthly review cycle to track progress and ensure continuous improvement.

Public Communication

Haben is committed to transparency and accountability in its modern slavery response:

- **Publishing this Modern Slavery Statement** is a key part of our public communication strategy, outlining the actions taken and progress made in identifying and addressing modern slavery risks.
- **We have adopted and published a Human Rights Policy**, which formalises our commitment to ethical business practices and sets clear expectations for our staff, suppliers, and partners.
- **Modern slavery awareness materials** are currently being developed for display throughout our shopping centres. These materials aim to raise public and worker awareness of modern slavery, including how to recognise potential indicators and what to do if something doesn't seem right.

Remediation & Grievance Mechanisms

Haben takes its responsibility to protect human rights seriously and is committed to supporting the identification and remediation of harm to people who may be impacted within our immediate supply chain.

While we do not yet have a formal remediation and grievance mechanism in place, we are actively developing a practical and accessible process that will enable any individual who may be a victim of modern slavery to safely notify us and seek help without fear of retaliation.

To ensure this approach is robust and sensitive, we have engaged an experienced industry expert to guide us through this complex area. This interim measure ensures we can respond ethically and responsibly to any concerns while we work toward implementing a structured mechanism aligned with global best practice.

Our goal is to create a system that prioritises safety, dignity, and meaningful remediation, reinforcing our commitment to act with integrity and protect vulnerable workers across our operations and supply chain.

Mandatory Criterion 5

Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks

Haben is committed to continuously improving its approach to identifying and addressing modern slavery risks across its operations and supply chains.



To assess the effectiveness of our actions, we have implemented the following measures:

Governance and Oversight

Haben has an established governance framework to ensure modern slavery risks are actively managed and addressed across the organisation. Central to this framework is the integration of Modern Slavery into our Corporate Risk Register, which is then supported by our **Modern Slavery Management Plan**. This Plan guides how the business identifies, mitigates, and responds to modern slavery risks.

The Plan is reviewed by the Board every six months, ensuring ongoing oversight, accountability, and alignment with our broader risk and compliance strategy.

Additional governance measures include:

- **Annual review of our Modern Slavery Statement** and associated actions by the Executive Team and Board.
- **Integration of modern slavery considerations** into enterprise risk management and compliance reporting processes.
- A commitment to **deliver future Modern Slavery Statements** as part of our annual reporting suite, supported by **third-party assurance** to ensure transparency, credibility, and continuous improvement.

Risk Assessment Monitoring

Modern Slavery is integrated into our Corporate Risk Register, and subsequently is being integrated into all Centre risk registers to ensure comprehensive management.

Our risk assessment processes are reviewed annually to ensure they remain current and responsive to changes in our operations or external risk factors. For example, if we expand into new geographic regions or engage new supplier categories, we reassess associated risks.

Staff Awareness and Training

We track participation in modern slavery awareness training and measure staff understanding through feedback and engagement. This helps us identify areas for improvement and tailor future training.

Grievance Mechanisms

We monitor any grievances or complaints raised through internal or external channels that may relate to labour rights or modern slavery concerns. Trends and outcomes are reviewed to inform future actions.

External Collaboration

We are exploring opportunities to partner with industry groups, external auditors, or NGOs to undertake independent reviews of our modern slavery response and benchmark our practices against industry standards.

Criterion 6

Describe the process of consultation with any entities the reporting entity owns or controls

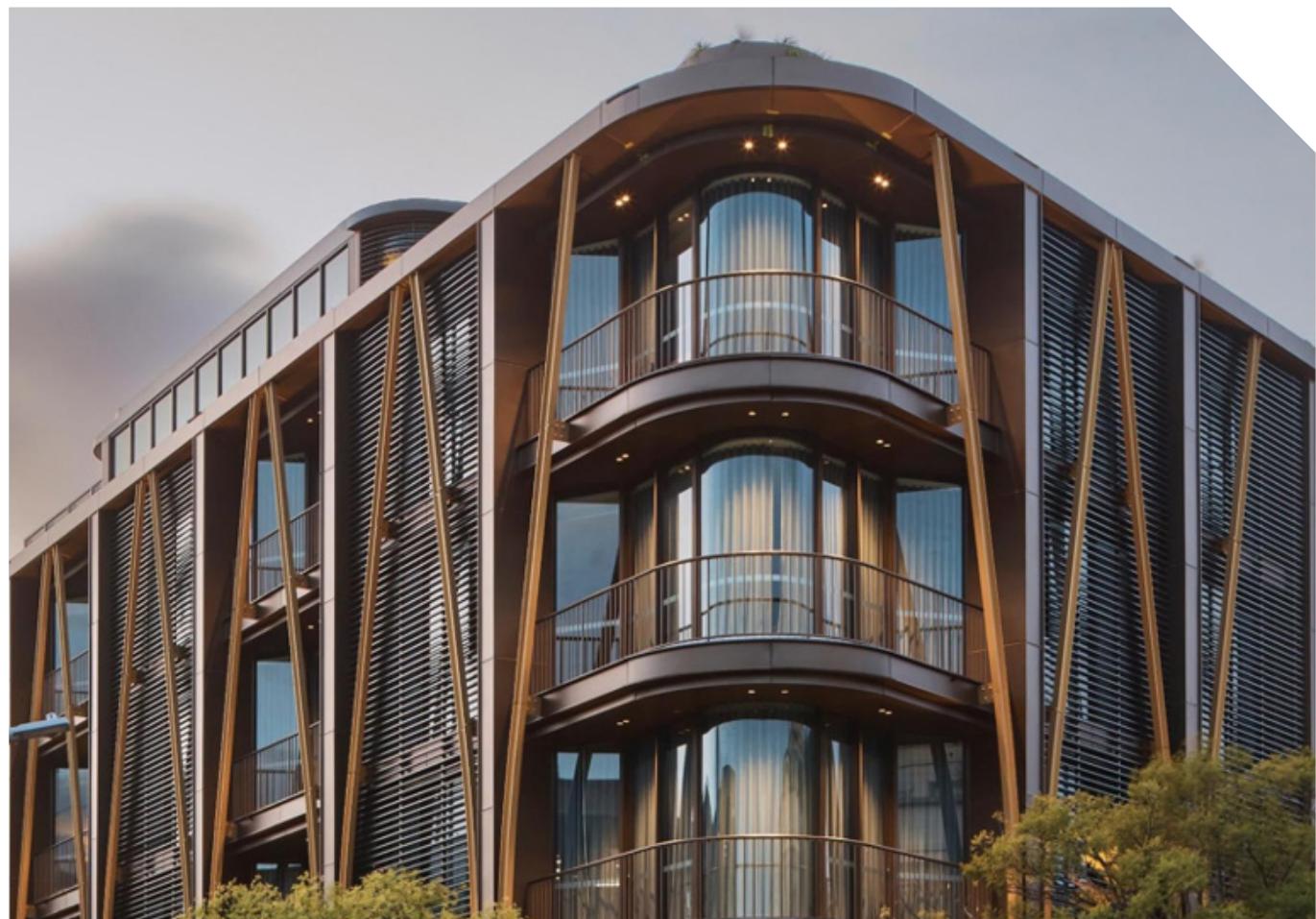
As all Haben employees are employed by Haben Property Fund Ltd (ABN 89 139 914 775) entity, we do not undertake formal consultation with entities we own or control. These entities are special purpose vehicles, typically structured as wholesale unit trusts. As a result, consultation processes are not required, though our governance and policies apply consistently across all entities.

Criterion 7

Any other relevant information

Haben is committed to strengthening its approach to human rights and modern slavery as part of our broader sustainability commitments. We will be forming a more integrated framework through our inaugural Sustainability Strategy, which will embed modern slavery risk management alongside other key sustainability priorities.

Beginning in FY26, we will report on this progress in our annual Sustainability Report, which will also include future Modern Slavery Statements that undergo independent assurance. This approach reflects our commitment to transparency, continual improvement, and building trust with stakeholders as we work to influence positive change across our operations and supply chains.



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