



PALLAS  
GROUP

# Pallas Group Pty Limited

[ABN 61 618 981 892]

## **Modern Slavery Statement**

Financial year ended 30 June 2024

## I. The Reporting Entity

Pallas Group Pty Ltd (**Pallas**) is the reporting entity based on its consolidated revenue exceeding \$100M over financial year 2024.

## II. Structure, operations and supply chains

### A. Structure

Pallas is a private company with wholly owned subsidiaries who provided funding for commercial real estate acquisitions and development in both Australia and New Zealand.

In addition to capital sourced from Pallas, the capital used to provide loans is sourced from money invested by qualifying members of the public into various trusts. These trusts are operated by wholly owned subsidiaries, largely being Pallas Funds Pty Ltd (AFS Licence No. 473475), as the trustee of unregistered managed investment schemes in Australia, and Pallas Trustees Limited (FSP1004322) as the trustee of schemes operated in New Zealand.

The investments of these trusts are managed in Australia by Pallas Capital Pty Ltd, an authorised representative of Pallas Funds Pty Ltd (ARN 001257626), and by Pallas Capital Limited (FSP1004241) in New Zealand.

In addition to the fees earned from its investment entities, Pallas also derives revenues from managing various properties and various property developments, through another wholly owned subsidiary, Pallas Development Management Pty Ltd trading as Fortis Development Group.

### B. Operations

Pallas' principal place of business is:

Pallas House,  
Level 5, 30-36 Bay Street  
Double Bay NSW Australia

Pallas also has operations based in Melbourne, Brisbane, Auckland and Christchurch.

Pallas' operations involve:

- Establishing investment trusts and raising capital by issuing offer documents to investors.
- Processing investment applications and banking money with ADIs.
- Issuing either units or interest-bearing notes to investors.
- Investing trust money into special purpose vehicles under the trusteeship of proprietary limited companies established for that purpose.
- Entering into commercial lending agreements with borrowers for the purposes of acquiring real property or to undertake property developments.

- Engaging construction firms to undertake land development on behalf of client developers.
- Engaging real estate firms to either source or sell real property on behalf of client developers.
- Preparing and issuing investor reports.
- Preparing and lodging financial statements.
- Preparing and lodging taxation returns.

Pallas has over 160 Australian and New Zealand based employees who are paid market-based salaries which are regularly reviewed against industry benchmarks. We have an internal Human Resources function and engage consultants with expertise on industrial relations law and management. We have implemented position descriptions for all roles and a staff performance management system. Human Resource policies are made available to all staff via an intranet.

The Board of Pallas receives regular reporting on business operations and financial performance. The Board has established a Risk & Compliance Committee which includes the head of Human Resources and the Chief Operating Officer amongst others. This Committee has responsibility for overseeing the compliance of the Pallas group of companies with relevant laws, including the *Modern Slavery Act 2018*.

## C. Supply chains

Pallas performs most of its operations using its internal resources and its employees. External suppliers include:

- Real estate firms
- Legal advisory firms
- Construction firms
- Property valuers
- Quantity surveyors
- Registered company auditors
- Taxation advisers
- Software suppliers
- Office cleaning providers

## III. Risk of modern slavery practices in the operations and supply chains

Because Pallas performs most operational tasks internally, we can ensure that modern slavery practices are not employed by the business.

Pallas only engages professional services firms with strong industry reputations providing the services listed above. These firms are domiciled in Australia and New Zealand and consist of individuals holding professional qualifications and relevant experience and are often subject to State or National regulatory requirements and licensing.

We consider that the risk of the Fund engaging in modern slavery practices through our services providers is low.

## IV. Actions taken to assess and address modern slavery risks

Pallas has implemented procedures for identifying, contracting with and managing outsourced providers. This includes considering the reputations of the service providers and their abilities to operate within the requirements of State and National laws.

## V. Assessing the effectiveness of its risk mitigations

Pallas has instituted an incident reporting framework. We monitor the efficacy of the modern slavery controls partly by assessing the responses received from compliance questionnaires and incident reporting. Notably, there were no adverse questionnaire responses or incidents concerning modern slavery throughout the 2024 financial year.

No instance of a modern slavery practice has been identified by Pallas through its operations.

In our view the current risk mitigations are effective.

Pallas Group is in the process of implementing further procedures as set out in the '*Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities*' May 2023. These include:

- Preparing guidelines for employees on how to identify modern slavery practices.
- Implementing training on modern slavery.
- Collecting modern slavery statements from services providers who are reporting entities.
- Providing services providers who are not reporting entities with letters setting out Pallas' expectations in relation to modern slavery.
- Potentially including prohibitions against modern slavery practices in future service agreements.

## VI. Approval by Board

This Statement has been approved by the Board of Pallas.

A handwritten signature in black ink, appearing to be 'PK', written in a cursive style.

Patrick Keenan  
Chairman, Pallas Group Pty. Limited