

# Modern Slavery Policy

## Introduction

This Modern Slavery Policy has been adopted by the Boards of Directors (the **Boards**) of Stride Property Limited (**SPL**) and Stride Investment Management Limited (**SIML**, together with **SPL**, **Stride**). Stride is committed to maintaining the highest standards of ethics, honesty, openness and accountability and to implementing and enforcing systems and controls to limit the risk of modern slavery occurring within its own business, its supply chains or through any other business relationship.

Modern slavery is a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

## Scope

This Modern Slavery Policy (Policy) applies to all persons working for or on behalf of Stride, including employees at all levels, directors, contractors, interns, consultants, and any other third-party representatives.

Stride expects all people and entities which have a business relationship with Stride to understand this Policy and act in a way consistent with its values.

This Policy should be read in conjunction with Stride's Code of Ethics and Code of Conduct, Protected Disclosures Policy, Conflicts of Interest Policy and Supplier Code of Conduct. This Policy does not form part of any employee's contract of employment and Stride may amend it at any time.

## Responsibility

The Boards have the overall responsibility for ensuring this Policy is complied with and each business unit must ensure they are meeting these requirements.

Management has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, and dealing with any queries about it. The prevention, detection and reporting of modern slavery in any part of Stride's business or supply chains is the responsibility of all those working for Stride or under its control.

## Principles

Stride will not tolerate any form of modern slavery in its operations or supply chain. Stride will:

- Maintain clear policies and procedures to ensure that it is addressing modern slavery and ethical sourcing risks in its activities and supply chains;
- Conduct checks within our supply chains and vet new suppliers;
- Seek to raise awareness so that Stride people know what we are doing to promote their welfare and the welfare of individuals working in our industry;
- Continue to tell the companies we do business with that we are not prepared to accept any form of human exploitation;
- Include in its operational and supplier contract terms, as far as practicable, requirements that suppliers comply with all local, national, and other relevant laws and regulations;
- Use in its supplier contact terms, as far as practicable requirements that suppliers:
  - Comply with the Stride Supplier Code of Conduct
  - Provide Stride with rights of termination if the supplier is unable or unwilling to work towards full compliance with Stride's Supplier Code of Conduct.
- Stride has adopted a Supplier Code of Conduct which sets out our expectation on suppliers to operate in an ethical manner and proactively identify and detect instances of modern slavery. A copy of Stride's Supplier Code of Conduct can be found on the Stride Property Website.

Employees and people who are performing in any capacity for Stride (**Stride Representatives**) are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

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Stride Representatives must notify their manager or the SIML General Manager Corporate Services as soon as possible if they believe or suspect that a conflict with this Policy has occurred or may occur in the future. Breaches of this policy may also be reported in accordance with Stride's Protected Disclosures Policy.

Stride Representatives are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the Stride business or supply chains at the earliest possible stage.

## Related Policies

- Code of Ethics
- Privacy Policy
- Diversity Policy
- Sustainability Policy
- Supplier Code of Conduct
- Conflict of Interest Policy
- Protected Disclosures Policy
- Respect at Work – Harassment, Bullying and Discrimination Policy

## Review of Policy

The Boards are accountable for approving this policy and amendments to it. This policy was approved in March 2024 and will be reviewed every 24 months or as circumstances require, such as the introduction of Modern Slavery legislation by the New Zealand Government.