



Daiwa House®
Australia

Modern Slavery Statement

DAIWA HOUSE AUSTRALIA PTY LIMITED ABN 90 169 473 241
PERIOD 1 JANUARY 2024 – 31 DECEMBER 2024





Contents

01 Introduction	2
02 Reporting Entities & Organisational Structure	4
2.1 Identifying The Reporting Identities	4
2.2 Corporate Governance	4
2.3 Organisational Structure	4
2.4 Consultation With Subsidiaries	4
03 Our Workforce	5
04 Our Supply Chain	6
05 Risk Of Modern Slavery Practices	8
5.1 Risk Assessment	8
5.2 Risk Control Measures	9
06 Risk Management	11
6.1 Committees And Policies	11
6.2 Supplier And Subcontractor Management	11
6.3 Effectiveness Of Risk Management	11
07 Response To Modern Slavery	12
7.1 Where We Are Today	12
7.2 Priorities	12
08 Approval	14
Annexure A - Reporting Entities	15

01 Introduction

The term modern slavery is used to cover a broad range of exploitive practices including but not limited to situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom, child exploitation, child labour and other slavery practices like human trafficking, forced marriage, deceptive recruitment and sexual offences. Modern slavery manifests in supply chains, through a variety of labour rights abuses.

Daiwa House Australia Pty Ltd (Daiwa House) opposes slavery in all of its forms. At Daiwa House we continue to be committed to addressing the risk of modern slavery in our operations, supply chains and contractors and to adopting measures to prevent all types of modern slavery.

In CY24, Daiwa House did not identify any instances of modern slavery in its operations or supply chain, noting that Daiwa House's operations have not changed since our last internal review in CY23.

This document is Daiwa House's fourth Modern Slavery Statement covering the period, 12 months to 31 December 2024.



02

Reporting Entities
& Organisational
Structure

2.1 Identifying the
Reporting Identities

Daiwa House Australia Pty Ltd ABN 90 169 473 241 (**Daiwa House**) and its consolidated group of companies are property developers that have operations in NSW, the ACT and Victoria. Daiwa House was established in NSW in 2014 and its ultimate parent is Daiwa House Industry Co Limited, Japan's largest homebuilder.

Daiwa House and its wholly owned or controlled entities as at 31 December 2024, are listed in Annexure A – Reporting Entities, and the reporting entities are identified for the purposes of the Modern Slavery Act 2018 (Cth).

Daiwa House submits this Statement as a Joint Statement on behalf of all of the reporting entities listed in **Annexure A – Reporting Entities**, pursuant to section 14 of the *Modern Slavery Act 2018 (Cth)*, excluding the Rawson Group of entities that have separately submitted their Statement.

2.2 Corporate
Governance

Daiwa House is committed to robust corporate governance policies and practices to ensure the continued success and growth of Daiwa House and its subsidiaries. Consequently, Daiwa House will continue to proactively review its governance practices so as to ensure it meets its obligations as a responsible corporate entity.

2.3 Organisational
Structure

The Board of Daiwa House is responsible for overseeing the response to identified modern slavery risks and for the approval of this Modern Slavery Statement.

The CEO/MD and CFO of Daiwa House are members of the Daiwa House Industry Risk Committee that meets every month, and this committee will, as required, be kept updated on all initiatives adopted by Daiwa House in managing any potential exposure to modern slavery practices in its supplier and contractor chains.

2.4 Consultation with
Subsidiaries

All subsidiaries operate from the centralised Head Office of Daiwa House and have their own Boards and the subsidiaries controlled by Daiwa House largely have policies, procedures, standards and reviews consistent with this Modern Slavery Statement.

03

Our
Workforce

Daiwa House has assessed the risk of modern slavery in its operations as negligible to none. The employees of Daiwa House are skilled professionals operating exclusively in Australia. There is no direct exposure to child labour, forced labour, exploitative labour practices, or other modern slavery key risk areas.

Daiwa House employs approx. 14 employees who all have individual employment contracts that confer pay and entitlements which are, at a minimum, in line with any relevant awards and minimum wage requirements.

All employees have access to the Managing Director/CEO including other Senior Members with whom any issues and/or concerns can be raised directly. In addition, all employees can directly discuss such concerns with either their direct Managers and/or escalate concerns through the Group's Whistleblower Policy.

Post the COVID-19 pandemic Daiwa House has adopted a hybrid working model which provides staff with the flexibility of working from home and the office and in both instances, Daiwa House is committed to ensuring safe workplaces across these various job locations.

Daiwa House continues to be committed to respect human rights in the workplace and this commitment is embedded in our policies and procedures which promote a safe, diverse and inclusive workplace, including:

- a. Code of Conduct
- b. Harassment, Discrimination and Bullying Policy
- c. Grievance and Dispute Resolution Policy
- d. Work Health and Safety (WHS) Policy
- e. Return to Work Policy
- f. Whistleblower Policy
- g. Remote Working Policy
- h. Flexible Working Hours Policy
- i. Anti Bribery Policy

Together with our Values, these policies outline our expectations of our employees, including our culture, as well as Daiwa House's commitment to support employees to feel safe, valued and included.

All Daiwa House policies are readily available and accessible by all employees in a 'Policies' folder in the Group's shared drive.

04 Our Supply Chain

Daiwa House has a diverse range of suppliers, including Government Authorities, building contractors (civil and built form), design consultants, engineers, surveyors, certifiers, information technology and security.

Our supplier and subcontractor selection process includes reviews to ensure compliance with Government mandated standards and compliance with health, safety and environmental standards.

When selecting suppliers and subcontractors, Daiwa House takes into consideration the geographical location of suppliers, original supply location and the type of goods and services, as well as their reputation.

Our direct suppliers may have their own complex and diverse supply chains that can extend beyond Australian borders. This includes having many suppliers of materials or services who in turn rely on many more suppliers, both domestic and international. It is this extended supply chain that we have identified as potentially being at the highest risk of breaching the modern slavery laws. We are committed to continuing to work with our suppliers and the extended supply chain to identify and address the potential existence of modern slavery in such instances.

Our direct development spend is predominately procured from Australian suppliers and consultants with minimal exposure to supply chains that extend beyond the Australian borders.



05

Risk of Modern Slavery Practices

5.1 Risk Assessment

A. ASSESSMENT OF SUPPLIERS

Daiwa House has assessed the risks, both external and internal, including international supply risks, sector risks and business partnership risks within its own operations and in its supply chain and we have determined that none of our own business operations are undertaken in the higher risk areas, whether by reference to geographical location or business sector. Daiwa House relies on third party suppliers in its supply chain to provide the products and services related to residential construction. Daiwa House has undertaken a review of existing supplier relationships to identify any gaps with current suppliers.

To the extent we identify any elevated risk in our supply chains, appropriate due diligence will be undertaken to satisfy ourselves that the parties concerned have in place ethical employment practices that comply with all relevant legislation including, where applicable, the making of an Anti-Slavery statement pursuant to the Modern Slavery Act 2018. Where suppliers have not published an Anti-Slavery Statement, we will request confirmation that they have in place such ethical employment practices and that they, in turn, have required their suppliers to have the same practices.

To date Daiwa House has not identified nor has it been advised of any high-risk suppliers but we will continue to effectively develop awareness on modern slavery for internal and external stakeholders and will continue to monitor the risk of slavery and human trafficking in our supply chains and our own business and will act and report accordingly.

B. STAFF TRAINING

Daiwa House has a strict internal process of ensuring that there is mandatory on-going Modern Slavery training for all staff within Daiwa House including Directors and personnel from Daiwa House's Head Office in Japan that work closely with the Daiwa House Australian Team.

This includes:

- a. Arrange the Modern Slavery Module to be rolled out in both English and Japanese for all new members of Daiwa House as well as newly appointed Directors across our Australian Group companies.
- b. Annually arrange the Modern Slavery Refresher course to be rolled out in both English and Japanese for all Daiwa House staff and appointed Directors across our Group, thereby ensuring that Modern Slavery is front of mind for all staff and executives.

The broad and extensive roll out of the Modern Slavery training by Daiwa House is considered the most effective means to properly upskill and engage all staff thereby enabling each and every staff member, in their daily roles, to properly identify and flag to management of Daiwa House potential modern slavery concerns.

Further, Daiwa House management have provided the following additional on-line training for local staff being areas of particular social focus and ensuring that all staff understand the need to keep all staff safe in the workplace:

- a. Respect @ Work – Sexual Harassment Training
- b. Antibullying and Harassment
- c. Cyber Security Awareness
- d. Risk Management Awareness

5.2 Risk Control Measures

A. ANNUAL REPORTING BY SUPPLIERS

Annually we will continue to source and review (where available) the published Modern Slavery Statements of our suppliers. Alternatively, where suppliers are not required to provide a Statement, we will separately undertake our own analysis by reference to our internally created checklists and/or by engaging directly with those suppliers.

B. ENGAGEMENT WITH SUPPLIERS

Daiwa House has prepared a supplier and service checklist process to assess direct or indirect risks of Modern Slavery Practices. We will continue to engage (as required) with suppliers of high-risk operations to understand if they have modern slavery risks and if applicable ensure that we are kept informed of how they are addressing such risks.

Daiwa House will continue to assess the benefit of developing further guidance for staff when on-boarding Suppliers in the form of a Supplier Code of Conduct, to compliment the business operations of the broader Daiwa House Group. Ultimately, the development of this initiative will form part of the future on-boarding process for new and existing Suppliers and Contractors.



06 Risk Management

6.1 Committees and Policies

The Daiwa House Board will continue to oversee the financial reporting, systems of internal control and its risk management framework, along with compliance with legal and regulatory requirements, and the setting of Daiwa House's risk appetite.

6.2 Supplier and Subcontractor Management

Daiwa House will continue to strengthen its internal due diligence on all existing and new suppliers and subcontractors (where applicable).

This will include:

- Requiring improvements to any substandard employment of Work, Health and Safety practices; and
- Sanctioning suppliers and subcontractors who fail to improve on performance in line with Daiwa House's minimum requirements.

The Project Control Group (PCG) meetings across the Group for our various Projects are the perfect forum to identify and address any potential challenges in the respective supply chains servicing the broader Daiwa House Group.

6.3 Effectiveness of Risk Management

We assessed effectiveness in CY24 by tracking our actions and outcomes which included: continuing to build on our internal knowledge and understanding of modern slavery, evidenced by the continued roll out of the Modern Slavery training and sourcing the Modern Slavery refresher training, ongoing engagement (direct and indirect) with our key suppliers to identify, analyse, assess and, if required, report and/or remediate incidences of modern slavery in our supply and contractor chains and consequently updating and/or adding to our governance documents.

07

Response to Modern Slavery

7.1 Where We are Today

- A range of actions have already been undertaken as part of Daiwa House's commitment to continuous improvement. During CY24 we have:
- a. Ensured that the CEO/MD and CFO of Daiwa House participated in the monthly Daiwa House Industry (Japan) Risk Committee and as required, have kept the Risk Committee updated on all new initiatives adopted by Daiwa House in managing any potential exposure to modern slavery practices in its supplier and contractor chains.
 - b. Continued to assess our workplace practices and conditions, relevant awards and pay structures.
 - c. Engaged key suppliers and contractors to determine and verify salient modern slavery risks. This included identifying the annual required reporting from suppliers detailing their initiatives to address the potential risk of Modern Slavery in their business and their supply chain.
 - d. Provided guidance to key personnel who are actively involved in overseeing the appointment of suppliers and contractors and ensure that they are able to properly identify any acts of modern slavery and consequently report such practices.
 - e. Provided Modern Slavery Awareness Training to core personnel both locally and in Japan.

7.2 Priorities for 2025

- As part of Daiwa House's continual commitment to their modern slavery obligations, during CY25 Daiwa House intends to:
- a. **Staff Training:** Ensure that all new staff members including Directors and executives undertake the Modern Slavery training that is offered in both English and Japanese and ensure that for all other current employees complete the Modern Slavery refresher course, which will also be offered in both English and Japanese. This continual focus on the Modern Slavery Training ensures that Modern Slavery is at the front of mind of all staff (notwithstanding their role and/or seniority within the Daiwa House Group) empowering them to properly identify potential modern slavery risks in Daiwa House's operations, supply chains and subcontractors.
 - b. **Distribution of Modern Slavery Supplier Questionnaires:** Continue to prepare and circulate to all its suppliers an annual Modern Slavery Supplier Questionnaire that will enable Daiwa House to assess any direct or indirect risks of Modern Slavery

- Practices inherent in the practises of its Suppliers. The Questionnaire essentially represents the Suppliers Code of Practice in respect of managing any potential Modern Slavery risks.
- c. **Maintain Data Base of Supplier and Contractor Questionnaire Responses:** Continue to maintain a database of all responses received to the circulated Modern Slavery Supplier Questionnaires and where required will identify any inherent Modern Slavery risks that will be properly managed in conjunction with the Supplier and Contractor.
 - d. **Onboarding Documentation:** Daiwa House will ensure that to the extent new suppliers and/or subcontractors are appointed the on-boarding documentation will as a minimum address the following key areas:
 - (i) They do not use any form of forced, compulsory, child or slave labour;
 - (ii) Their employees work voluntarily, without duress and are entitled to resign from their employment as and when they choose; and
 - (iii) They provide each employee with an employment contract that meets the relevant employment act, award or National Employment Standards (NES).



08

Approval

This Modern Slavery Statement covers 1 January 2024 to 31 December 2024 and has been approved by the Daiwa House Board of Directors at the Board meeting held 28 May 2025.

Signed by


Koji Morishige
Managing Director and CEO


Constantina Alifakiotis
Company Secretary

Annexure A -

Reporting Entities

COMPANY NAME	ACN	ABN	COMPANY NAME	ACN	ABN
Daiwa House Australia Pty Ltd	169 473 241	90 169 473 241	RC Resi No 8 Trust*	N/A	97 798 640 184
DH Box Hill Pty Ltd	625 555 553	99 625 555 553	RC Resi No 9 Pty Limited*	609 906 514	N/A
DH Summer Hill Pty Ltd	169 580 045	63 169 580 045	RC Resi No 9 Trust*	N/A	21 953 272 487
DH MQW Pty Ltd	669 077 276	91 669 077 276	RC Resi No 10 Pty Limited*	609 906 756	N/A
Summer Hill Joint Venture	N/A	33 193 019 436	RC Resi No 10 Trust*	N/A	94 509 759 955
Rawson Group Pty Ltd*	000 382 329	64 000 382 329	RC Resi No 11 Pty Limited*	609 907 468	N/A
Rawson Homes Pty Ltd*	053 733 841	67 053 733 841	RC Resi No 11 Trust*	N/A	38 424 292 883
Rawson Communities Pty Ltd*	003 203 745	20 003 203 745	RC Resi No 12 Pty Limited*	609 915 264	98 609 915 264
Rawson Legal Pty Limited*	167 806 135	62 167 806 135	RC Resi No 14 Pty Limited*	609 925 251	72 609 925 251
Home & Land Centre Pty Limited*	607 038 433	83 607 038 433	RC Resi No 14 Trust*	N/A	74 804 107 288
Thrive Homes Pty Limited*	613 679 333	99 613 679 333	RC Resi No 15 Pty Limited*	609 948 709	47 609 948 709
Fern Bay No 1 Pty Limited*	168 462 048	18 168 462 048	RC Resi No 15 Trust*	N/A	92 174 990 499
Fern Bay No 1 Trust*	N/A	80 185 298 149	RC Resi No 16 Pty Limited*	609 949 484	N/A
Aurora (Alex Ave) Pty Limited*	163 788 305	95 163 788 305	RC Resi No 16 Trust*	N/A	45 572 434 323
The Aurora Unit Trust*	N/A	78 402 911 234	RC Resi No 17 Pty Limited*	609 949 877	N/A
Schenectady Pty Limited*	616 100 228	N/A	RC Resi No 17 Trust*	N/A	97 178 196 027
Schenectady Trust*	N/A	96 473 663 422	RC Resi No 18 Pty Limited*	609 949 984	N/A
Fort Meyers Pty Limited*	616 439 260	N/A	RC Resi No 18 Trust*	N/A	99 836 152 669
Fort Meyers Trust*	N/A	86 645 364 293	RC Resi No 19 Pty Limited*	609 951 475	N/A
Port Huron Pty Limited*	619 867 284	N/A	RC Resi No 19 Trust*	N/A	41 701 564 558
Port Huron Trust*	N/A	Not registered	RC Resi No 20 Pty Limited*	609 951 475	N/A
Mint Loans Pty Limited*	622 298 079	80 622 298 079	RC Resi No 20 Trust*	N/A	54 193 440 207
Mint Loans Trust*	N/A	35 634 683 032	RC Resi No 21 Pty Limited*	648 329 748	N/A
RC Resi No 1 Trust*	N/A	76 998 062 289	RC Resi No 21 Trust*	N/A	77 884 560 876
RC Resi No 2 Pty Limited*	602 813 150	N/A	RC Resi No 22 Pty Limited*	655 564 202	N/A
RC Resi No 2 Trust*	N/A	99 409 312 440	RC Resi No 22 Trust*	N/A	39 273 015 312
RC Resi No 3 Pty Limited*	602 847 325	N/A	RC Resi No 23 Pty Limited*	655 877 473	N/A
RC Resi No 3 Trust*	N/A	29 189 440 504	RC Resi No 23 Trust*	N/A	52 870 114 452
RC Resi No 4 Pty Limited*	602 850 760	89 602 850 760	RC Resi No 24 Pty Limited*	655 875 237	N/A
RC Resi No 5 Pty Limited*	602 851 954	76 602 851 954	RC Resi No 24 Trust*	N/A	13 749 845 428
RC Resi No 6 Pty Limited*	602 860 999	93 602 860 999	RC Resi No 25 Pty Limited*	655 875 871	N/A
RC Resi No 7 Pty Limited*	602 861 003	N/A	RC Resi No 25 Trust*	N/A	32 784 160 230
RC Resi No 7 Trust*	N/A	25 291 312 625	Rawson Real Estate Sales Pty Ltd*	671 975 554	25 671 975 554
RC Resi No 8 Pty Limited*	607 041 430	N/A			

*Rawson Group Pty Ltd (ABN: 64 000 382 329) as head entity of the 'Rawson Consolidated Group' has lodged a separate Modern Slavery Statement for its Group of Companies.



