



# Scott Park Group

## Modern Slavery Statement 2025

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### About this Statement

This Modern Slavery Statement describes the steps taken by Scott Park Group Pty Ltd (ACN 118 798 253) (**Scott Park Group**) and its controlled entities during the financial year ending 31 December 2025 to address modern slavery risks to its business and supply chains. Scott Park Group makes this statement in accordance with the Modern Slavery Act 2018 (Cth) and draft guidance for reporting entities.

### 01 Introduction

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

Scott Park Group is committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls, to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We consulted the relevant entities we own, or control, in the risk assessment, actions taken and suggested actions to be taken, and in the development of this statement.

### 02 Our Operation and Structure

Reporting entity Scott Park Group Pty Ltd (ACN 118 798 253) (Scott Park Group) is a leading residential construction company in Western Australia with operations in Perth, Southwest and the Midwest, and an overseas operation in the Philippines.

As of 31 December 2025, Scott Park Group has 431 employees and 126 contractors in Australia, 144 employees in the Philippines, and approximately 2,400 suppliers and subcontractors. We built 1280 homes in the last year in Western Australia.

Scott Park Group is owned by its founder, Scott Park, and Sumitomo Forestry Australia, which is wholly owned by a Japanese listed company, Sumitomo Forestry Co., Ltd. Sumitomo Forestry Group has a Human Rights Policy, participates internationally in the UN Global Compact and the World Business Council for Sustainable Development, and



complies with international human rights bills, the International Labour organisation Core Labour Standards, the Ten Principles of the UN Global Compact and the United Nations Guiding Principles on Business and Human Rights. Their Code of Conduct calls for the respect of the human rights of all individuals and does not permit forced labour or child labour in any form.

Scott Park Group Pty Ltd consists of housing construction businesses which include the following companies:

- Redink Homes Metro
- Redink Mid-West
- Redink South-West
- 101 Residential
- B1 Homes

As well as its vertically integrated companies:

- Let's Finance
- Glass Co Metro
- Uncut Plumbing
- SP Ceilings & Insulation

As outlined, Scott Park Group operates under a number of brands with centralisation of some business activities including Procurement, People & Culture, Safety and IT in our Australian operations. We have an overseas subsidiary called Scott Park Group Philippines which provide a range of outsourced services to Scott Park Group including drafting and scheduling. The centralised structure for these services allows the group to be more cost-effective and maintain a consistently higher level of quality.

### **Our Supply Chain**

Our supply chain includes various products and services primarily the procurement of building and construction goods and materials, technology, and office equipment. We work with subcontractors, suppliers, professional services, and on occasion, recruitment agencies. In the main, the responsibility for procuring building materials is centrally managed and sourced through local and national Australian suppliers.

### **03. Identifying Risks of Modern Slavery in our Operations and Supply Chain**

The Scott Park Group acknowledges that, in construction, we operate within a high modern slavery risk industry. We have previously assessed the risk of modern slavery practices within our operations, in Australia and in the Philippines, and, to a limited extent, in our supply chain, examining potential to cause, contribute to, or be directly linked to modern slavery. While there is no material requirement to report in Philippines on Modern Slavery, we have adopted the same risk assessment, investigation, and preventative measures as in Australia.

We review our risk analysis on a yearly basis. The information below reflects our current assessment of risk as of December 2025.

#### **a) Risks in Our Australian Operations:**

We have determined that our direction operations represent a low risk due to the following:

| <b><u>Identified Risks</u></b> | <b><u>Reasoning behind Risk Assessment</u></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| Permanent Staff                | <ul style="list-style-type: none"> <li>* Board of Directors which has overall responsibility for ensuring Scott Park Group complies with our legal and ethical obligations, our code of conduct, and that those under their control comply</li> <li>* COO with Modern Slavery accountability</li> <li>* Modern Slavery Committee which is comprised of representatives of Scott Park Group's building companies, vertical integrated companies, Procurement, Safety and People &amp; Culture which identifies and is responsible for consulting on and monitoring entities on risks of modern slavery which meets on a quarterly basis</li> <li>* Designated Modern Slavery contact for all modern slavery related queries or concerns</li> <li>* A companywide email address for raising modern slavery possible risks or / and concerns</li> <li>* Strong HR controls including employment contracts which adhere to all relevant fair work legislation</li> <li>* Annual award audit conducted across all roles to ensure no wage underpayments exist</li> <li>* An online Employee induction &amp; onboarding process which ensures all employees have read and understood policies and are able to communicate risks and/ or concerns; this includes Whistle Blower, Code of Conduct and Modern Slavery policies</li> <li>* An online training platform which hosts a training and awareness course on Modern Slavery which is a mandatory requirement for all employees to complete</li> <li>* A variety of Employee Wellbeing initiatives and work flexibility arrangements</li> </ul> |
| Casual Staff or Contractors    | <ul style="list-style-type: none"> <li>* 10 casual staff are paid above award wages and in line with all fair work legislation</li> <li>* 1 of the casual staff is under 18</li> <li>* 126 Contractors who are predominantly Sales Professionals</li> <li>* Casual Staff and Contractors complete Mandatory training on Modern Slavery on online platform and receive and acknowledge related policies as part of their Induction Pack</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Staff on Visas                 | SPG has 10 staff on partner visas or bridging visas                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

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| Migrant workers         | <p>In 2024 SPG sourced and brought a number of skilled workers from the Philippines (Glaziers and Fibrous Plasterers) to Western Australia under the State Construction Visa program. An additional 15 skilled workers, primarily bricklayers, arrived in 2025, bringing the total number of staff on a construction visa to 27. These workers are skilled tradespeople, with a minimum of five plus years' trade experience. SPG meets, or exceeds, the requirements for the visa, including pay in line with local employees and above the minimum salary requirement under the visa. SPG provides extensive onboarding and support and assists with sourcing and securing accommodation and transportation. The skilled workers are employed on the same basis as local employees, provided the same training, and fall under the same policies and entitlements. If they do overtime they are paid in line with the award. While the skilled workers are sponsored by SPG they are entitled under the visa arrangements to source alternative employment should they wish.</p> <p>We used the services of an experienced recruitment agency who are headquartered in Perth with overseas operations in the Philippines. The contractual arrangement with the labour hire agency has specific agreement to comply with the Modern Slavery Act 2018. The agency has operated for twenty plus years, and has placed 10,000 plus workers, in 400 organisations across six continents, including for sizeable companies. They have an established team with skillsets across recruitment, learning and development, training and assessing, technical experts with Philippines and Australian work experience and visa/ migration experts. Of specific note, they undertake Trade testing, Pre-Employment Medicals, IELTS Training and Assessment (English Language competency), Visa Processing, POEA &amp; RA Deployment Mobilisation and use Trade Recognition Australia (TRA) standards for Cert 111 RPL process and Cert IV qualified trainers and assessors). They do not charge candidates for employment.</p> |
| Services engaged by SPG | <p>SPG relies on services including recruitment, cleaning, and property maintenance. We have long-standing relationships with recognised service providers who agree to our Supplier Agreements which contain reference to Modern Slavery clauses.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

#### **b) Risks in Our Philippines Operations:**

The Philippines is ranked as 30<sup>th</sup> out of 167 countries by the Global Slavery Index with an estimated 784,000 Filipinos living in modern slavery (Global Slavery Index 2018). Our assessment of current risk of Modern Slavery in our Philippines operation, as of December 2025, is low. Our Philippines Operation was recently awarded Best Companies to work for in Asia (Philippines district) by HR Asia.

| <b><u>Identified Risks</u></b> | <b><u>Reasoning behind Risk Assessment</u></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| Staff                          | <p>*Australian General Manager, who visits the Philippines office every 2-3 months for a week, reports to the Board, has overall responsibility for ensuring Scott Park Group complies with legal and ethical obligations, and that those under their control comply with them, and who sits on the Modern Slavery Committee</p> <p>*History of eleven years in operation with an experienced Management team in the Philippines and in Australia</p> <p>*Regular visits from a variety of leaders in the business, including the CEO</p> <p>*144 employees, who are university, educated and hold skillsets in in-demand areas such as drafting, scheduling, and estimating</p> <p>*Regular staff meetings and training</p> <p>*Employees are currently in an office located in a modern building in Makati City with individual desks, perspex dividing screens, meeting rooms, kitchen, and facilities. They will be upgrading in 2026 to a secured office space in Yuchengco Centre, classified a Class A Building Grade, which has state of the art facilities and sustainable design. It features a rooftop garden, wellbeing and retail facilities and a food hall. The office space, designed with the involvement of the team, includes a pantry and dining area, breakout and creative areas, open plan and office-based workspaces and lockers</p> <p>*Strong HR controls including</p> <ul style="list-style-type: none"> <li>• Employment contracts with salaries that well exceed minimum rates of pay, explanations of a probationary period, working hours, leave entitlements causes for termination and suspension, and procedural due process which comply, at minimum, with the Labour Code of the Philippines and are in line with Sumitomo's Code of Conduct</li> <li>• A detailed Employee induction, onboarding process and 98-page HR manual which is provided to each new employee which outlines general employment conditions, compensation, benefits (including maternity and paternity), grievance process, and disciplinary code which is read and signed on the first day of employment</li> <li>• Modern Slavery, Whistle Blower and Code of Conduct Policies which align with Australian policy with a subclause which states where there is a variance or that OS is silent on a position that the Australian policy shall take precedence (on the basis that there is no material requirement to report in the Philippines)</li> <li>• A formal career progression plan with yearly performance</li> </ul> |



|                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                       |
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|                                                                                  | <p>appraisal and clear guidance for salary payment and progression in career with accompanying salary increases</p> <ul style="list-style-type: none"> <li>• A Scott Park Group Excellence Program which supports employees with career development in the form of acquiring further skills to support promotion or exposure to other skillsets or areas of the business</li> </ul>                   |
| Casual Staff or Contractors                                                      | <p>Three Consultants under a Contractor arrangement</p> <p>No casual employees under the age of 18</p>                                                                                                                                                                                                                                                                                                |
| Subcontracted labour hire                                                        | <p>Staff required such as cleaning or English language teaching are sourced and paid directly and do not supply staff</p>                                                                                                                                                                                                                                                                             |
| Services / Suppliers specifically engaged by Scott Park Group in the Philippines | <p>Procurement specifically sourced for the Philippines operation includes the purchase of furniture, stationary, office suppliers, drafting software and computer equipment which are purchased/ leased from larger, well-known international organisations. With the new office design and purchase of furnishing, Supplier and Purchasing Agreements have reference to Modern Slavery clauses.</p> |



### **c) Risk in Our Supply Chain**

A sizeable component of the construction and supply of materials is through our supplier and subcontractor base. Scott Park Group have a large number of registered suppliers with approximately 2,400 suppliers and subcontractors being invoiced in the last financial year. Our procurement expenditure in FY 2025 was \$376 million paid to suppliers of services related to our core activities in Australia.

Due to the length of time Scott Park Group has been operating we have a strong, collaborative relationships with our often-longstanding supplier and subcontractor base, some for over twenty-five years. Our solid reputation and ability to build quality homes is in very much reliant on them and we work with them in a cooperative and consultative manner.

Much of our labour in Australia is supplied through subcontractors, predominantly trade based, and on occasion through a recruitment agency. Demand has continued in 2025 to be high for trade skills in Western Australia, with accompanying high rates and choice of companies hiring, therefore we see low risk to permanent residents/ citizens. To our knowledge the employees of our subcontractors are permanent residents/ citizens of Australia.

As outlined in our analysis in 2024 Modern Slavery statement, key risks of Modern Slavery in construction are in the procurement of building materials and products (KPMG Property, Construction and Modern Slavery report 2020).

While we see the risk of Modern Slavery in our Australian suppliers as low, we acknowledge that they usually, in turn, source raw materials or components or labour from their overseas suppliers. Materials made in Asia, in particular for some raw material components and manufacturing processes, are more commonly associated with practices of modern slavery.

Selection for materials is often made by the customer or by a subcontractor supplying labour and materials. Additionally, the transportation of these materials to Australia also creates modern slavery risk as transport and logistics are considered high risk for modern slavery.

As outlined in the 2024 Modern Slavery report we engaged with the top and higher risk suppliers across the Scott Park Group. We surveyed our suppliers; of those that responded, mainly national and international companies, with turnovers of in excess of AUD\$100 million, demonstrated progressing in their own risk assessment of their supply chain in addition to supplying Modern Slavery statements and evidence of compliance to SPG. Another is a signatory to the UN Global Impact. However, of the suppliers, 61% were not required to report on Modern Slavery.

All respondents confirmed that their suppliers have not, to the best of their knowledge, been convicted of any offence involving modern slavery and agreed to notify Scott Park Group if they become aware of any actual, potential or perceived modern slavery in their operation or their suppliers. They also confirm that they will conduct their business in a manner to reduce the risk of modern slavery in their operations and have agreed to participate in a modern slavery audit.





We are aware that, at this stage, our visibility, and therefore understanding of the risk of Modern Slavery, is still, at this stage, at the tier one larger supplier level. We would like to extend our knowledge and understanding of the supply chains, the components of the materials and our suppliers' suppliers and manufacturers.

To this end, this year, with our parent company, Sumitomo Forestry Group, our suppliers have taken part in a Sustainable Procurement Questionnaire. In this we began the move, in line with the Commonwealth Anti-Slavery Commissioner's 2025-2028 Strategic Plan, from compliance and self-reporting towards what practical due diligence has been undertaken. 95% of suppliers have so far responded, with 100% required to undertake the survey. Response is required to continue to be a supplier to the group. Detailed data for this is being collected and analysed.

Based on our knowledge at this stage, as of December 2025, we assess local larger suppliers as being low risk, smaller suppliers as medium risk, and are unable to accurately assess the risk in tier two and three suppliers and manufacturers at this stage. We therefore see the overall risk in our supply chain as medium.

| <b><u>Identified Risks</u></b> | <b><u>Reasoning behind Risk Assessment</u></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| Suppliers                      | * Suppliers are required to complete a Supplier Registration Form, signed by a Authorised person, within which the supplier warrants that the Supplier and its supply chain has not been convicted of any offence involving Modern slavery, that it must notify the Customer if it becomes aware of any actual, perceived or potential risk and warrants that its supply chain conducts its business to reduce the risk of modern slavery and agrees to participate in a Modern Slavery Audit. This documentation is required to be signed and provided to Scott Park Group before an invoice is paid. It includes a modern slavery specific email address for any concerns or risks to be raised.                        |
| Subcontractors                 | *Subcontractors receive a Group Trade Pack which refers to the Modern Slavery policy and acknowledges receipt of, and agreement to the Policy, prior to commencing work on site. It requires Subcontractors to immediately raise concerns about any issue or suspicion of modern slavery in any part of its business or supply chains of any supplier tier. This document is signed, and agreed to, before commencement of any work. It includes a modern slavery specific email address for any concerns or risks to be raised<br><br>*We do see particular areas as higher risk given the lack of requirement for skilled trade and trade qualifications. These are forming the part of an action for our 2026 roadmap. |





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| Collation of Information | <p>*In 2024 SPG established an online survey and analysis tool for suppliers in relation to Modern Slavery. We anticipated that this would enable easier communication, updating of information and analysis however we found response rates were much lower from this tool than when called or emailed directly from the Procurement Manager at SPG. We transitioned back to calls and emails and created a folder for each supplier with relevant information gained from them, confirmation of affirmation with Modern Slavery requirements and copies of Modern Slavery Policies and additional information.</p> <p>*In relation to subcontractors we use a platform which ensures that particular documents and agreements, including in relation to the prevention of Modern Slavery, are made and stored.</p> |
| Major Tenders            | <p>*Scott Park Group has included, as a requirement for any major tenders, that the bidder address the risk of modern slavery in its supply line and operations and outline what prevention measures, they have in place. As mentioned, we have prioritised this in assessing companies to undertake the fit out of the new office building in Manila.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                           |



#### **4. Actions we have taken to address modern slavery**

Scott Park Group are committed to the highest ethical behaviour attainable and will continue to train and communicate with our employees, suppliers, and the greater supply chain to reduce wherever possible any incident of modern slavery. Specific actions taken in this reporting period include:

##### **a) Australia Operations**

###### Introduced Flexible Working Arrangements

Various brands and departments in Scott Park Group introduced 9-day fortnights as an option for employees this year. This sits alongside the RDO (Rostered Day OE) program.

###### Assessing Regularity of Overtime

A project to assess regularity of overtime was undertaken across the brands to ensure that workloads are reasonable within a standard working week and that employees are not consistently required to undertake overtime.

###### Raising Employee Awareness

We have included in our employee communications, in Scott Park Group internal newsletters and our developing Intranet, reminders to raise any potential concerns regarding Modern Slavery via our confidential email address or to any member of the Modern Slavery Committee meeting.

##### **b) Overseas Operation**

###### New Office Fit Out

As outlined above, the Overseas Operation is relocating to a new building in Manila which has a number of wellbeing and green features and employee amenities. With the decision to relocate to a larger, more modern office, our Modern Slavery and Group Safety committee meeting members have been involved to ensure that there is no risk of modern slavery with the contractors and suppliers selected to undertake the fit out. The Modern Slavery prevention clauses have already been added to supplier tenders and contracts.

###### Expansion of Programs for Overseas Employees

We have expanded a number of programs for our employees including:

- Expansion of the secondment and overseas training trips for employees to come to Scott Park Group, or our sister groups, and for Australian based employees to visit the Manila office
- Introduction of Health and Wellbeing support for employees and their families in the case of natural disasters
- Expansion of the 'Work from Home' program to reduce travel and increase flexibility for employees

###### Assessment of the Capacity of each Role

A project was undertaken by the Overseas Leadership team to assess the capacity of each role. This was done to ensure appropriate resourcing and proactive hiring.

##### **c) Subcontractors and Suppliers**



### Ongoing Consultation with Key & High-Risk Suppliers

With our parent company, Sumitomo Forestry Group, our suppliers have also recently taken part in a Sustainable Procurement Questionnaire which assessed their approach to Modern Slavery including policies, employee education and governance.

It covered:

- Human rights accountability and training
- Prohibition of forced and child labour
- Compliance with wages, working hours and legal standards
- Whistleblowing systems and worker protections
- Employee rights and development opportunities

It also included questions specifically in relation to ensuring that sourcing of products (or their raw materials) excludes illegally harvested timber and that workers are protected in locations where the company sources raw food.

The questionnaire requested information where responses were inadequate and provided examples from Sumitomo Forestry Group in relation to definitions, policies and appropriate reference links.

### **5. Assessing the Effectiveness of our Actions and Path forward**

Scott Park Group has not, as yet identified any cases of actual or suspected modern slavery or associated behaviour occurring in our supply chains and operations over the reporting period. We collated a number of key measures which we are monitoring which include:

- The number of risk/s identified, the number of incidents identified, and the number of questions generated through our officers, employees, and contractors in relation to Modern Slavery to our Modern Slavery Committee and / or Managers
- The use of any whistleblowing procedures through which Modern Slavery risks in the business or supply chain have been drawn to the attention of Scott Park Group

### **Our Roadmap for 2026 includes:**

#### Assessing Employee Awareness

As part of our Wellbeing and Safety survey in 2026 we will include questions in relation to Modern Slavery to accurately measure the level of understanding and awareness by our employees as a result of the Modern Slavery Policy and training undertaken.

#### Strengthening Supply Chain Due Diligence

We see our ongoing work as three-fold. The first to engage deeper, as mentioned, with our smaller current suppliers. While all Suppliers comply with Modern Slavery requirements, we appreciate that there is a need to further educate and encourage our smaller suppliers to develop their own risk analysis. To this end we are in the process of developing a Modern Slavery Support Pack which will provide education, links to appropriate resources and examples of actions that could be taken to raise awareness of Modern Slavery as a smaller organisation.

The second prong is for us to move beyond our tier one Suppliers to better understand their risks and the measures their Suppliers are putting in place to prevent Modern Slavery. As mentioned, we will be analysing the data from the latest Questionnaire to



determine where to focus our efforts.

The third step is to explore higher risk subcontractors to Scott Park Group where skillsets do not require trade qualification. We identified these areas to be ceramic tilers, painters, cleaners, ceilings and insulation installers. We have identified our main subcontractors in these areas and will be communicating with them to understand the measures they have in place to prevent Modern Slavery.

#### Sumitomo Forestry Australia

Sumitomo Forestry Australia has commenced the development of a Modern Slavery Workplan which will inform future priorities and embed a framework for the group and its subsidiaries to further build our capabilities in identifying and mitigating modern slavery risks.

#### Industry Awareness

Both our COO and Group Safety Manager are on industry (HIA) committees. We see opportunity to encourage discussion within the industry, to provide guidance and learn from others' approaches.

#### Development of a Remedial Framework

As we move from awareness, and compliance questions, to practical due diligence indicators with our supply chain, we are considering the audit process and what remedial steps need to be put in place should modern slavery be discovered.

### **06 Describe the Process of consultation with any entities the reporting entity owns or controls**

We have prepared this statement in consultation, and with ongoing education, with our owned and controlled entities. The Modern Slavery Committee, which is representative of our entities, ensures that risks are assessed, discussed, and addressed. The Modern Slavery Committee has responsibility for communicating to the businesses and to the Board. We see this as an ongoing process of continual learning and improvement to better understand and reduce the risks of Modern Slavery in our operations and supply chain.

This statement was approved by the members of the board of Scott Park Group on 28/05/2026.

DocuSigned by:  
A handwritten signature in black ink, appearing to read "SJP".  
BD8A89EB05E946E...

Scott James Park

Director