



**RAWSON  
GROUP**  
— EST 1978 —

# Modern Slavery Statement

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RAWSON GROUP PTY LIMITED ACN 000 382 329  
PERIOD: 1 JANUARY 2022 – 31 DECEMBER 2022





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## 1

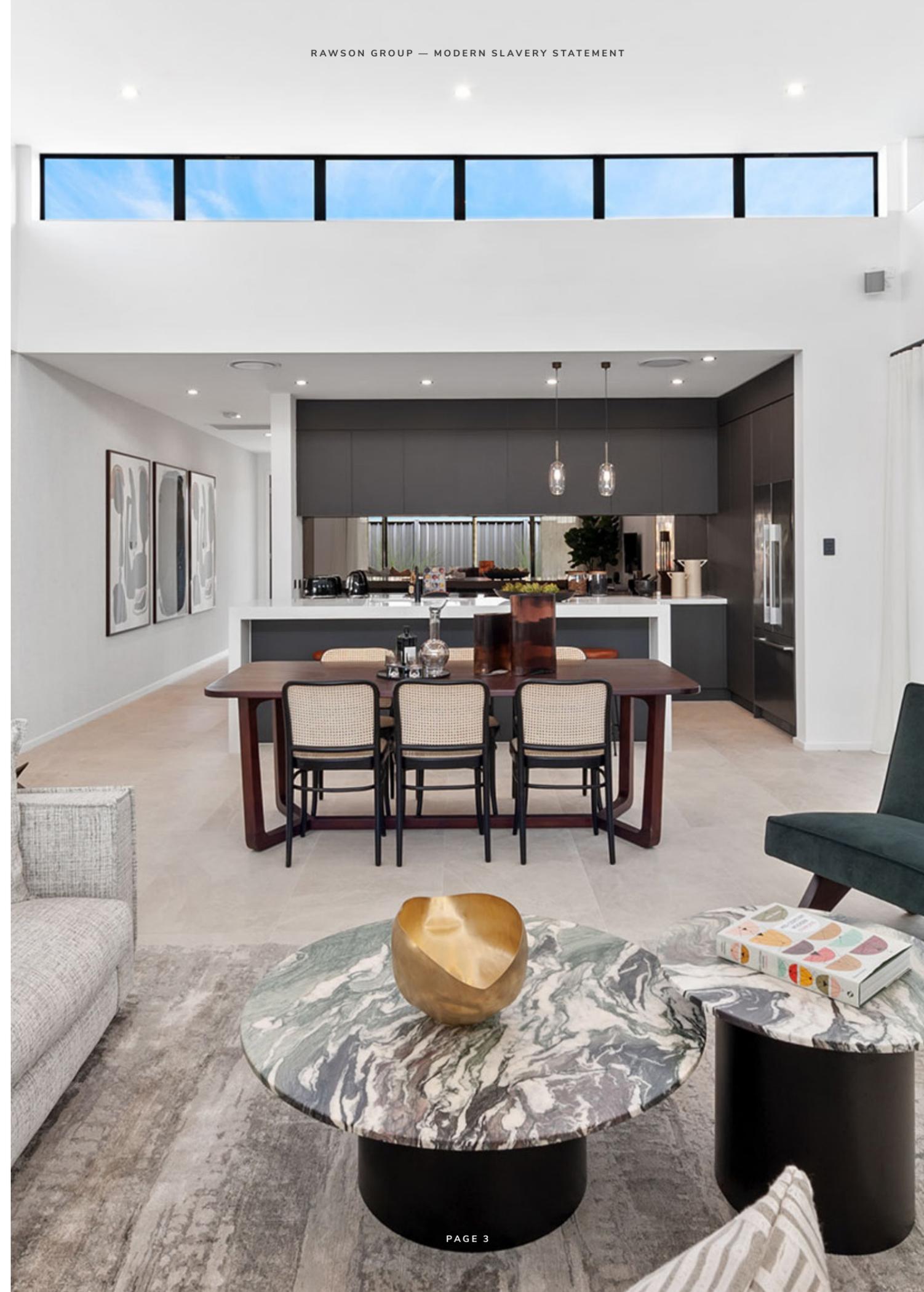
## Introduction

Pursuant to the requirements of the Modern Slavery Act 2018 (Cth) (the Act), this statement sets out the actions taken by Rawson Group Pty Limited ACN 000 382 329 (Rawson) and its wholly owned or controlled entities to address and minimise the risk of modern slavery in its business and supply chain.

This is Rawson's third Modern Slavery Statement and covers the calendar year to 31 December 2022. In CY22, Rawson did not identify any instances of modern slavery in our operations or supply chain.

The term modern slavery is used to cover a broad range of exploitative 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; other slavery practices like human trafficking and deceptive recruitment. Modern slavery manifests in supply chains through a variety of labour rights abuses.

Rawson opposes slavery in all of its forms. At Rawson we are 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.



# 2

## Reporting Entities & Organisational Structure

### 2.1 IDENTIFYING THE REPORTING IDENTITIES

Rawson Group is a residential construction and development company based in New South Wales (NSW) with operations in both NSW and the Australian Capital Territory (ACT).

Established in 1978, Rawson became part of the Daiwa House Industry Co Limited, Japan's largest homebuilder in 2018.

Rawson is committed to the design, sale and construction of residential homes and developments in NSW and the ACT.

Rawson and the wholly owned or controlled entities as at 31 December 2022, which are listed in Annexure A – Reporting Entities, are identified as reporting entities for the purposes of the Modern Slavery Act 2018 (Cth). Rawson 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).

### 2.2 CORPORATE GOVERNANCE

Rawson is committed to robust corporate governance policies and practices to ensure the continued success and growth of Rawson and its subsidiaries. Rawson proactively reviews its governance practices to meet its obligations as a responsible corporate entity.

### 2.3 ORGANISATIONAL STRUCTURE

The Rawson Board is comprised of a majority of non-executive directors responsible for ensuring that the Group is managed in a manner that protects and enhances the interests of its stakeholders and takes into account the interests of customers, suppliers, contractors and the wider community.

The Board is responsible for overseeing Rawson's response to modern slavery risks and for the approval of this Modern Slavery Statement. Rawson's approach to modern slavery risk management is reviewed by the Audit & Risk Committee, which was established in 2021.

### 2.4 CONSULTATION WITH SUBSIDIARIES

The effective control and management of Rawson subsidiaries is held by the Rawson Group Board and Executive Committee and operated from a centralised head office. All subsidiaries are subject to the policies, procedures, standards and reviews as outlined in this statement.

# 3

## Our Workforce

Rawson has assessed the risk of modern slavery in its operations as negligible to none. Rawson's employees 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.

Rawson employs around 250 people 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 CEO and any issues or concerns can also be raised to the General Manager, People and Culture or through the Whistleblower Policy.

During the COVID-19 pandemic, employees were asked to work from home in line with government policies and recommendations in place at the time. Videoconferencing was used extensively to maintain contact between employees with an increased focus on employee wellbeing and mental health. Rawson has now moved to a hybrid working from home and office model and is committed to ensuring a safe workspace in all locations.

Rawson's commitment to the ethical conduct of business and respect for human rights in the workplace is embedded in our policies and procedures, including:

- a) Code of Conduct;
- b) Harassment, Discrimination and Bullying Policy;
- c) Whistleblower Policy;

- d) Anti-Bribery Policy;
- e) Gift Receiving and Gift Giving Policy;
- f) Work Health and Safety (WHS) Policy;
- g) Flexible Work Policy; and
- h) Recruitment Policy.

All policies are readily available for view by all employees on Rawson's intranet. Together with our Values, these policies outline Rawson's expectations of its employees and culture and Rawson's commitment to supporting employees to feel safe, valued and included.







# 4

## Our Supply Chain

Rawson 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, Rawson 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 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 being at the highest risk of breaching modern slavery laws. We are committed to working with our suppliers and the extended supply chain to identify and address modern slavery.

Our development spend is predominantly procured from Australian suppliers and consultants.

## 5

## Risks of Modern Slavery Practices

### 5.1 RISK ASSESSMENT

#### *Assessment of Suppliers*

Rawson 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. We have determined that none of our own business operations are undertaken in higher risk areas, whether by reference to geographical location or business sector. Rawson relies on third party suppliers in its supply chain to provide the products and services related to residential construction. Rawson has undertaken a review of existing supplier relationships to identify any gaps with current suppliers.

Rawson Group will continue to monitor the risk of slavery and human trafficking in its supply chains and its own business, and we will act and report accordingly.

#### *Staff Training*

A key initiative undertaken in 2022 was mandatory training for Directors, Executives, General Managers and Procurement specialists to improve their knowledge of modern slavery and increase their ability to identify risks in Rawson's operations, supply chain and subcontractors in respect to potential modern slavery. A total of 24 people from both Rawson and its parent company completed the training, which was offered in both English and Japanese.

### 5.2 RISK CONTROL MEASURES

#### *Due Diligence*

Where we have identified the chance for elevated risk in our supply chains, appropriate due diligence has been 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 a Modern Slavery Statement pursuant to the Modern Slavery Act 2018 (Cth). Where suppliers have not published a Modern Slavery Statement, they are required to confirm that they have in place such ethical employment practices and that they, in turn, require their suppliers to have the same.

#### *Annual Reporting by Suppliers*

Annual reporting is required from our suppliers with updated information and initiatives surrounding Modern Slavery in their business and supply chain network through review of suppliers' Modern Slavery Statements and progress against identified risks.

Where a supplier is not required to provide a Modern Slavery Statement we review alternatives in terms of assurance of adherence to principles.

#### *Engagement with Suppliers*

Rawson has prepared a supplier and service checklist to assess direct or indirect risks of Modern Slavery Practices. We have strengthened our engagement with suppliers of high-risk operations. We have also engaged with our suppliers to understand how they are addressing their modern slavery risks.

As foreshadowed in our previous Modern Slavery Statement, Rawson has now drafted a Supplier Code of Conduct and Practice which addresses modern slavery risks and will be implemented in 2023.

## 6

## Risk Management

### 6.1 AUDIT AND RISK COMMITTEE AND RISK MANAGEMENT FRAMEWORK

In 2021 Rawson established an Audit and Risk Committee to assist the Rawson Board of Directors in monitoring and reviewing any matters of significance which may affect financial reporting and compliance. The broad functions of the Audit and Risk Committee are to oversee Rawson's financial reporting, systems of internal control, along with compliance with legal and regulatory requirements and the setting of Rawson's risk appetite.

In 2022 the Committee developed a Risk Management Framework which was adopted by the Board and is now in place for the company. This formal framework provides systems to map, identify and control risks, as well as evaluate the effectiveness of risk mitigations. It will help ensure that any risks of modern slavery are quickly identified and addressed.

### 6.2 SUPPLIER AND SUBCONTRACTOR MANAGEMENT

Rawson carries out due diligence on all suppliers and subcontractors via both the onboarding and induction process, and continued audits of existing suppliers and subcontractors. This includes:

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

In 2022, Rawson also instituted regular business review meetings with key suppliers to understand any challenges in their supply chain and actions taken to prevent them.

### 6.3 EFFECTIVENESS OF RISK MANAGEMENT

We assessed effectiveness in CY22 by tracking our actions and outcomes which included: updating or adding to our governance documents; building on our internal knowledge and understanding of modern slavery; ongoing engagement 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.

## 7

## Response to Modern Slavery

### 7.1 WHERE WE ARE TODAY

A range of actions have been undertaken as part of Rawson's commitment to continuous improvement. In CY22 we have:

- (a) Established a Risk Management Framework which has developed a clear and detailed internal process to identify and address risks, including the risk of modern slavery in our supply chain;
- (b) Engaged key suppliers and contractors to determine and verify salient modern slavery risks. This included requiring annual reporting from suppliers to provide updated information and initiatives surrounding Modern Slavery in their business. It also included regular business review meetings with key suppliers;
- (c) Identified and assessed any suppliers with higher risks of modern slavery with their downstream services and suppliers overseas. We have reviewed these suppliers in line with risk prioritisation tools and are confident that they comply with the regulations;
- (d) Provided training in Modern Slavery Awareness to 24 people including members of the Board, management and procurement staff of both Rawson and its parent entities; and
- (e) Undertaken an ongoing review of our workplace practices and conditions, relevant awards and pay structures.

### 7.2 PRIORITIES FOR 2023

A number of future priorities were identified in our previous Modern Slavery Statement and during the course of CY22 which we intend to implement during CY23. These are:

- (a) **Supplier Code of Practice:** This has been drafted and explains Rawson's expectations of suppliers in terms of identifying and addressing modern slavery risks. The Code will be implemented in 2023.
- (b) **Onboarding documentation:** In order to further improve Rawson's supplier and subcontractor due diligence, Rawson has amended our onboarding documents to include provisions addressing modern slavery. The new onboarding documents will be put in place during 2023.
- (c) **Quarterly Business Reviews with key suppliers:** In the past Rawson has held regular business review meetings with suppliers to understand supply chain challenges. In 2023 these will be formalised as Quarterly Business Reviews and will address modern slavery as a standing agenda item.
- (d) **Staff training:** Modern Slavery Awareness training will be compulsory for key management and procurement staff.



# 8

## Approval

This Modern Slavery Statement covers 1 January 2022 to 31 December 2022 and has been approved by the Rawson Board of Directors by Circular Resolution.

Signed by:



**Gary Flowers,**  
Chairman



**Lyndall Stewart,**  
Company Secretary

## Annexure A - Reporting Entities

COMPANY NAME	ACN	ABN
Rawson Group Pty Limited	000 382 329	64 000 382 329
Rawson Homes Pty Limited	053 733 841	67 053 733 841
Rawson Communities Pty Limited	003 203 745	20 003 203 745
Rawson Legal Pty Limited	167 806 135	62 167 806 135
Home & Land Centre Pty Limited	607 038 433	83 607 038 433
Thrive Homes Pty Limited	613 679 333	99 613 679 333
Fern Bay No 1 Pty Limited	168 462 048	18 168 462 048
Fern Bay No 1 Trust	N/A	80 185 298 149
Aurora (Alex Ave) Pty Limited	163 788 305	95 163 788 305
The Aurora Unit Trust	N/A	78 402 911 234
Schenectady Pty Limited	616 100 228	N/A
Schenectady Trust	N/A	96 473 663 422
Fort Meyers Pty Limited	616 439 260	N/A
Fort Meyers Trust	N/A	86 645 364 293
Port Huron Pty Limited	619 867 284	N/A
Port Huron Trust	N/A	51 824 337 092
Mint Loans Pty Limited	622 298 079	80 622 298 079
Mint Loans Trust	N/A	35 634 683 032
RC Resi No 1 Trust	N/A	76 998 062 289
RC Resi No 2 Pty Limited	602 813 150	N/A
RC Resi No 2 Trust	N/A	99 409 312 440
RC Resi No 3 Pty Limited	602 847 325	N/A
RC Resi No 3 Trust	N/A	29 189 440 504
RC Resi No 4 Pty Limited	602 850 760	89 602 850 760
RC Resi No 5 Pty Limited	602 851 954	76 602 851 954
RC Resi No 6 Pty Limited	602 860 999	93 602 860 999
RC Resi No 7 Pty Limited	602 861 003	N/A
RC Resi No 7 Trust	N/A	25 291 312 625
RC Resi No 8 Pty Limited	607 041 430	N/A
RC Resi No 8 Trust	N/A	97 798 640 184
RC Resi No 9 Pty Limited	609 906 514	N/A

COMPANY NAME	ACN	ABN
RC Resi No 9 Trust	N/A	21 953 272 487
RC Resi No 10 Pty Limited	609 906 756	N/A
RC Resi No 10 Trust	N/A	94 509 759 955
RC Resi No 11 Pty Limited	609 907 468	N/A
RC Resi No 11 Trust	N/A	38 424 292 883
RC Resi No 12 Pty Limited	609 915 264	98 609 915 264
RC Resi No 14 Pty Limited	609 925 251	72 609 925 251
RC Resi No 14 Trust	N/A	74 804 107 288
RC Resi No 15 Pty Limited	609 948 709	47 609 948 709
RC Resi No 15 Trust	N/A	92 174 990 499
RC Resi No 16 Pty Limited	609 949 484	N/A
RC Resi No 16 Trust	N/A	45 572 434 323
RC Resi No 17 Pty Limited	609 949 877	N/A
RC Resi No 17 Trust	N/A	97 178 196 027
RC Resi No 18 Pty Limited	609 949 984	N/A
RC Resi No 18 Trust	N/A	99 836 152 669
RC Resi No 19 Pty Limited	609 951 475	N/A
RC Resi No 19 Trust	N/A	41 701 564 558
RC Resi No 20 Pty Limited	647 976 289	N/A
RC Resi No 20 Trust	N/A	54 193 440 207
RC Resi No 21 Pty Limited	648 329 748	N/A
RC Resi No 21 Trust	N/A	77 884 560 876
RC Resi No 22 Pty Limited	655 564 202	N/A
RC Resi No 22 Trust	N/A	39 273 015 312
RC Resi No 23 Pty Limited	655 877 473	N/A
RC Resi No 23 Trust	N/A	52 870 114 452
RC Resi No 24 Pty Limited	655 875 237	N/A
RC Resi No 24 Trust	N/A	13 749 845 428
RC Resi No 25 Pty Limited	655 875 871	N/A
RC Resi No 25 Trust	N/A	32 784 160 230





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