



## Dahua Group Waterloo Project Pty Ltd - Modern Slavery Statement for year ending 31 December 2024

### About this Statement

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1. This Modern Slavery Statement (**Statement**) covers the activities of Dahua Group Waterloo Project Pty Ltd (ACN 602 597 697) (**Dahua Group Waterloo Project**) over the calendar year ending 31 December 2024 (**Reporting Period**) and has been prepared to comply with the requirements of the *Modern Slavery Act 2018* (Cth) (**Act**).
2. The reporting entity is Dahua Group Waterloo Project.
3. Dahua Group Waterloo Project's registered office is Suite 20.02, Level 20, 201-217 Elizabeth Street, Sydney NSW 2000.
4. This Statement has been prepared to meet the mandatory criteria as outlined in the Act.

### Our Structure and Operations

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#### Structure

5. Dahua Group Waterloo Project forms part of the Dahua Group of companies (**Dahua Group**).
6. Dahua Group Waterloo Project does not own or control any other entity.
7. As at the date of making this Statement, Dahua Group Waterloo Project does not employ any employees, as it is a special-purpose vehicle (SPV) entity.

#### Operations

8. The Dahua Group is a top tier property development and real estate company which originated in China and expanded to Australia in 2014. In Australia, the Dahua Group has successfully completed projects in both Sydney, New South Wales and Melbourne, Victoria.
9. Dahua Group Waterloo Project's main operations encompass investment, development, construction, property development as well as portfolio management and business operation services.

### Our Supply Chains

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10. Dahua Group Waterloo Project is committed to eliminating the potential for modern slavery practices in its operations and supply chain. Similarly, it is dedicated to ensuring that the risks of modern slavery practices within Dahua Group Waterloo Project's business operations are addressed in accordance with the principles set out in the Act.

11. As a property development and real estate company, our supply chains relate to the supply of goods and services in all aspects of the built environment. These supply chains encompass the entire development process, including sourcing property for our clients/customers, architecture, design, landscaping and project management.
12. Our supply chains are diverse and multi-tiered, and include (but are not limited to):
  - 12.1 Goods and materials, including but not limited to earthworks (sand, soil, asphalt), landscaping, steel, timber, concrete, stormwater pipes and pits, electrical services and equipment, hydraulic and plumbing services and equipment;
  - 12.2 Services, including in relation to the development of new properties and engaging suppliers or sub-contractors to assist in all aspects of the development, including engaging professional consultants including architects, town planning, civil engineering, surveying, urban design, landscape design and other disciplines associated with property development; and
  - 12.3 Operating expenses to run the business including corporate suppliers providing office space, cleaning services, technology, office materials, catering and insurance.
13. Our direct suppliers also have their own supply chains that extend beyond Australian borders. For example, our principle civil contractors have supply chains for building materials (e.g. electrical goods and equipment, hydraulic pumps and equipment and miscellaneous products) to North America (USA, Canada) and Asia (including Malaysia, Indonesia, China and Vietnam plus others). Increasingly our contractors are seeking to source materials locally due to disruptions with overseas supply chains. We are committed to working with our suppliers both locally and internationally to identify and address any modern slavery practices.

#### **Identifying Risks of Modern Slavery Practices**

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14. We appreciate that certain geographical locations and industries in our supply chain present greater risks of modern slavery practices. We continuously review these risks to prioritise our efforts where necessary.
15. Dahua Group Waterloo Project acknowledges and recognises the following modern slavery risks as most relevant in our local and international supply chains:
  - 15.1 Forced or unpaid labour;
  - 15.2 Unsafe working conditions or labour;
  - 15.3 Debt bondage;
  - 15.4 Human trafficking; and
  - 15.5 Servitude.
16. The areas of business that are most susceptible to modern slavery risks largely relate to our indirect overseas supply chains and the following high-risk categories:

- 16.1 Temporary Labour Contracts in Construction: for example, in relation to any unpaid labour or unsafe working conditions regarding the engagement of workers by our sub-contractors; and
- 16.2 Overseas suppliers: for example, suppliers of steel, timber, concrete, stormwater pipes etc.

### **Actions Taken to Address the Risks**

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- 17. To manage modern slavery risks, we have recently developed methodology for identifying, mitigating and remediating risks, as well as ongoing assessment of the effectiveness of such actions.
- 18. This methodology / due diligence process includes identifying, preventing, mitigating and accounting for how the business addresses its human rights risks, such as modern slavery. This process involves:
  - 18.1 risk identification and assessment informed by mapping our operations and supply chain and identifying and prioritising the most severe risks;
  - 18.2 implementing risk management measures (including training as set out below); and
  - 18.3 monitoring the risk management measures taken.
- 19. We set out below the specific actions taken to address the high-risk categories set out above.

### *Policies, governance and training*

- 20. Dahua Group Waterloo Project has a robust corporate governance framework in place, and a comprehensive set of policies and procedures which outline our values, ways of working and expectations of employees and suppliers. These policies ensure that Dahua Group's employees and suppliers understand our expectations of standards and behaviour.
- 21. Dahua Group Waterloo Project has the following policies in place that assist in mitigating risks regarding modern slavery:
  - 21.1 including Anti Bribery and Corruption Policy;
  - 21.2 Prevention of Discrimination, Bullying and Harassment Policy; and
  - 21.3 Work, Health and Safety Policy.
- 22. We have also created avenues for anonymous reporting of any suspected modern slavery activities relating to Dahua Group Waterloo Project.

### *Contractor Agreements*

23. As set out above, Dahua Group Waterloo Project when engaging contractors to undertake works, these contractors typically act as single contracting entity. Our standard contractor agreements expressly require:
- 23.1 any consultants and contractors to provide a statutory declaration to confirm that any subcontractors engaged are paid appropriately and regularly; and
  - 23.2 any consultants and contractors to comply with applicable Australian work, health and safety legislation.

### **Assessing and Measuring the Effectiveness of Actions Taken**

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24. To date, our business focus has been to establish due diligence systems to identify, assess and address any risks of modern slavery practices.
25. With the assistance of external specialists, Dahua Group Waterloo Project has committed to undertaking a detailed risk assessment of its supply chain, and will continue to develop that risk assessment to assist with identifying risks associated with modern slavery.
26. We engage in the following processes which are aimed at assessing the effectiveness of our actions taken to date in relation to modern slavery:
- 26.1 Dahua Group Waterloo Project now conducts an annual review of its response to modern slavery; and
  - 26.2 Dahua Group Waterloo Project collaborates with industry body on best practice strategies in detecting and minimising modern slavery risk.

### **Future Commitments**

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27. Our approach to measuring the effectiveness of how we assess and manage modern slavery-related issues continues to evolve.
28. Over the next reporting period, we will continue to assess ways to reduce the risks of modern slavery practices. Some steps to be taken include the following:
- 28.1 Continuing to monitor, assess and improve supplier performance;
  - 28.2 Engaging with internal and external stakeholders on best practice guidelines;
  - 28.3 Implementing further training to HR team to implement modern slavery awareness for the wider business;
  - 28.4 Restructuring our staff induction program (for new and existing staff members) to include an overview of modern slavery grievance mechanisms; and
  - 28.5 Continuing to review and amend Dahua Group Waterloo Project's standard consultancy agreement with suppliers to ensure compliance with modern slavery obligations.
29. We recognise that transparent and accessible grievance mechanisms to support stakeholders is central to our ongoing management of modern slavery-related issues.

This Statement is made pursuant to section 13(1) of the Act. This Statement has been approved by the principal governing body of Dahua Group Waterloo Project, being its Board of Directors.

A handwritten signature in black ink, appearing to read 'Yuxing Li', written in a cursive style.

**Yuxing Li**  
**Dahua Group Waterloo Project Pty Ltd**  
**18 June 2025**