MODERN SLAVERY STATEMENT 2025 Rev 1

1 Introduction

This statement is made by Kajima Icon Holdings Pty Ltd (ACN 617 584 175) (**KIH**) and its wholly owned or controlled subsidiaries (together, “Icon”, “we”, “us” and “our”). The statement is made pursuant to the *Modern Slavery Act 2018* (Cth) (**MSA**) and sets out the actions taken by Icon to assess and address modern slavery and human trafficking risks within our business and supply chain for the financial year ending 31 December 2025 (**Reporting Period**).

KIH is wholly owned by Kajima Construction Australia Pty Ltd, whose ultimate parent company is Kajima Corporation, a Japanese publicly listed construction company headquartered in Tokyo. Kajima Construction Australia Pty Ltd is wholly owned by Kajima Australia Pty Ltd and these two entities, along with Kajima Cockram International Pty Ltd, Integrated RE Pty Ltd, Kajima Development Australia Pty. Ltd. and Kajima Capital Oceania Pty Ltd submit their own joint modern slavery statements. For this reason, Icon submits this statement as a single modern slavery statement under section 13 of the MSA.

Icon has four core values which define who we are and how we operate:

- **Think people** – people are our business. We look out for each other and create safe, healthy workplaces that celebrate diversity.
- **Act together** – we are stronger together and our actions speak louder than words. Our people embody a collaborative spirit with clients, partners, and local communities.
- **Create possibilities** – we know it takes hard work to get the job done. We are open minded, and solutions driven and take responsibility for our actions and demonstrate leadership in the face of adversity.
- **Earn success** – we consistently challenge ourselves. Innovation, problem solving and continuous improvement are the basis of everything we do.

We recognise that people are our most important asset. We seek to ensure that our workplaces are safe and healthy for our people and other stakeholders and value diversity in our people. With a ‘people come first’ culture, we advocate equal opportunity and aim to make all employment decisions based on merit and without discrimination.

2 Our structure, operations and supply chains

2.1 Structure

Icon is made up of several entities that provide construction and other services to third parties and internally. These entities include:

- Icon Corporate Services Pty Ltd;
- Icon Co Holdings Pty Ltd which is the 100% owner of:
    - Icon Co (Aust) Pty Ltd;
    - Icon SI (Aust) Pty Ltd;
        - Interface Cladding and Façade Pty Ltd (100% owned);
        - Barpa Pty Ltd (49% owned);

        - Kianga Group Pty Ltd (100% owned)
      - Leighs Cockram JV Limited (New Zealand only) (50% owned);
  - Icon Co (QLD) Pty Ltd;
  - Minicon Construction (Qld) Pty Ltd;
  - Minicon Construction (Aust) Pty Ltd;
  - Icon Co (NSW) Pty Ltd;
  - Cockram Construction New Zealand Limited (New Zealand only); and
  - Icon Co Pty (NZ) Limited (New Zealand only).

2.2 Operations

Icon is one of Australia and New Zealand's largest construction providers operating across a wide range of private and public sectors with projects ranging in size from $0.5 million to $840 million and annual revenues in excess of $1.4 billion (refer to "our projects" section below for further details, including the services provided by Minicon and Barpa).

Icon has offices in Victoria, New South Wales, Queensland, Australian Capital Territory, Northern Territory, Western Australia and New Zealand. These offices support Icon's construction activities in each region. KIH's registered office is C/- Pitcher Partners Advisors Pty Ltd, Level 13, 664 Collins Street Docklands VIC 3008

Our operations include various unincorporated Joint Ventures for example with Reeves International (and CCB Envico) on selected Pacific and Australian projects respectively and with Lipman on the Bathurst Hospital project. These Joint Ventures have been included in this statement and the risk assessment provided below.

During the Reporting Period, Icon employed approximately 758 staff of which 10 were casuals, 709 were full time and 39 were part time.

The roles performed by our employees included:

- Construction workers who provide a variety of support functions for Icon's construction operations, including site logistics management and maintenance services, supervision, traffic management, defects management and project team support
- Graduates / cadets
- Project coordinators
- Design (design coordinator, design manager, digital and BIM design)
- Services (service coordinator, service manager)
- Planning
- Estimating
- New business & marketing
- Submissions coordination
- Risk / Compliance
- Legal

- Site supervision
- Site Management
- Project Management
- Construction Management
- Commercial (contract administrator, contract manager, commercial manager)
- Finance (accounts payable / receivable, payroll, financial accountant, CFO, Group CFO)
- Human resources (HR BP, Group HR Manager)
- Administration (receptionist, administration assistant, executive assistant)
- Regional / Divisional Managers
- Safety & Environment (safety coordinator, safety manager, sustainability manager)
- Quality (quality coordinator, quality manager)
- Executive Management (CEO, etc.)

Our projects

Construction of projects is performed by suppliers engaged by Icon. Our projects are predominately in the following sectors and located in Australia, New Zealand and the Pacific:

- Aged care/retirement
- Commercial/retail
- Data centres
- Defence
- Education
- Government
- Healthcare
- Hotels/leisure
- Industrial
- Laboratories/R&D
- Pharmaceutical
- Residential
- Student accommodation
- Build to rent (BTR)
- Sports
- Technology

The legal entities trading as Minicon and Barpa perform the following activities:

Minicon	Minicon delivers projects at small to medium project values across many sectors, including health and science, technology, education, commercial and high-end residential. Minicon shares financial, OHS & E, IT and innovation and IP resources with Icon and Kajima.
BARPA	Barpa is an unincorporated joint venture between the indigenous majority owners, the Federation of Victorian Traditional Owner Corporations (51 per cent), and Icon, which provides expertise and additional staff to support Barpa's growth and development. Barpa provides construction capability to manage a wide cross section of projects in various industry sectors including defence, health and education. As noted above, Barpa is also the 100% owner of the Kianga Group, a subcontract painting and coatings business operating Australia-wide.

2.3 Supply chain

Our first tier supply chain remains unchanged from our 2024 Statement. It is primarily comprised of suppliers of construction materials, plant and equipment, various tradespeople and labourers, IT and communications services, software and hardware, professional services and consultants, utilities and facilities. The majority of our construction activities continue to be delivered through the standard subcontracting model commonly used in the construction industry. Under this model, trade work is predominantly undertaken either by subcontracting businesses that provide all materials, labour, supervision and plant, or by material suppliers whose products are installed by other subcontractors engaged on the project.

Any other preliminary works on a project (traffic management, cranes, security, etc.) are also subcontracted out.

During the Reporting Period, the use of iPro modern slavery software (implemented in 2023) continued to mature and remains embedded within our procurement processes (explained in further detail in sections 3.1 and 4.4)[1].

To enable improved compliance (including Modern Slavery) and drive better consistency and digitisation of our procurement procedures, during the 2025 reporting period Icon implemented the **ProcurePro** procurement solution. The Modern Slavery requirements and iPro Subcontractor Assessments have been included as a required attachment prior to approval of any trade packages managed in the system.

The iPro software has continued to provide further valuable information regarding our first-tier suppliers and has consistently generated superior visibility of our second-tier suppliers. This continues to provide confirmation that significant numbers of our suppliers operate, produce and source goods across the following sectors:

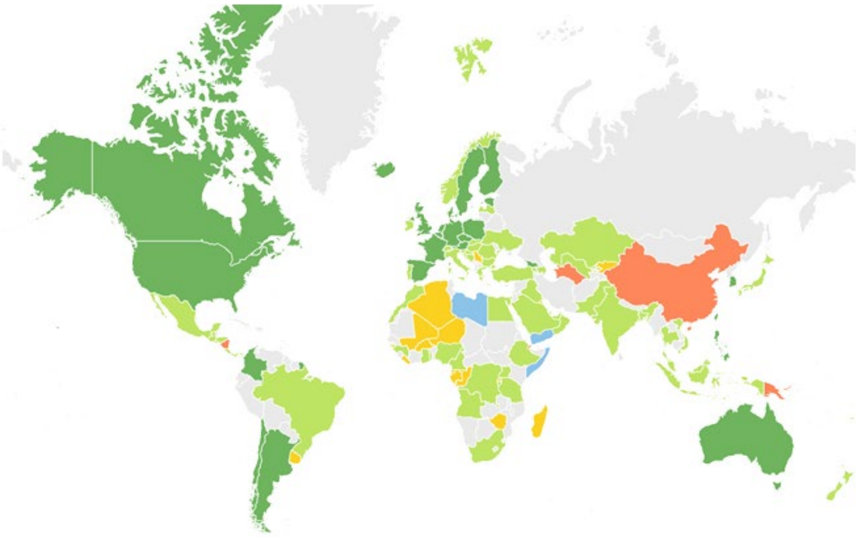
- Accommodation and food service activities
- Building Services
- Construction
- Manufacturing
- Mining and quarrying
- Transportation and storage
- Wholesale

The iPro software has continued our visibility of the locations where our first-tier suppliers operate, produce goods and source goods from. It remains the case that the majority of our first-tier suppliers operate in Australia (97%).

Icon have a small number of suppliers operating in China, Djibouti, Papua New Guinea, Nicaragua and Turkmenistan which are considered high-risk jurisdictions in relation to human trafficking because the local governments do not fully meet the minimum standards of the Trafficking Victims Protection Act and are not yet making significant efforts to do so.

The following graphic is sourced from iPro as at December 2025 and provides a snapshot of the countries where our first-tier suppliers have operations.

[1] In this statement, all data and graphics sourced from iPro are based on the Q1 2026 iPro Insights Report dated 10 February 2026.



Tier 1

Countries and regions whose governments, at the date of this assessment, fully meet the Trafficking Victims Protection Act's (TVPA) minimum standards.

Tier 2

Countries and regions whose governments, at the date of this assessment, do not fully meet the TVPA's minimum standards, but are making significant efforts to meet those standards.

Tier 2 Watch List

Countries and regions whose governments, at the date of this assessment, do not fully meet the TVPA's minimum standards, and as the (increasing) number of victims is significant without proportional action, and/or no evidence of increased efforts to combat trafficking has been provided.

Tier 3

Countries and regions whose governments do not, at the date of this assessment, fully meet the minimum standards and are not yet making significant efforts to do so.

Tier Special Case

Due to civil conflict and humanitarian crises, gaining information is difficult and a tier has not been assigned.

Uncategorised

At the date of this assessment, insufficient information is available about these countries or regions and a tier has not been assigned.

3 Modern slavery risks in our operations and supply chains

3.1 Risk assessment process

During the 2025 Reporting Period, Icon maintained its use of the iPro Modern Slavery Assessment Tool (**MSAT**). Further details on system implementation can be found in our 2023 Statement.

In December 2025, Icon continued its annual risk assessment survey of its supply chain using iPro to evaluate suppliers for modern slavery risk. Our total number of suppliers decreased in 2025 to 2934 related to a downturn in business activity and the data clean-up in iPro reports.

Whilst the number of suppliers completing the survey decreased 18% from 1520 in December 2024 to 1247 in December 2025 this represents an improvement in our response rate of 8% (2024: 34.8%; 2025:42.5%).

Icon identified some variable changes in the modern slavery risk levels from the 2024 reporting period with a 9% increase in the Inherent risk score and a 3% reduction in Unmitigated risk score respectively (refer below).

Suppliers using MSAT must complete an on-line self-assessment questionnaire covering their sectors, operational locations, sourcing practices and existing controls. Responses are processed in iPro to generate their risk score and assign a corresponding risk category. Additionally, due diligence step, suppliers are required to upload supporting documentation.

Each supplier that completed the assessment was assigned one of the following risk categories by the iPro software:

Risk categories

Low-Risk (No inherent risk)
Low-Risk (Adequate risk control)
Medium-Risk (Partial risk control)
High-Risk (Inadequate risk control)
High-Risk (High levels of inherent risk)

To determine the appropriate risk category, responses are first evaluated for risks inherent to a supplier's operations. This is referred to as the **Inherent Risk Score**. The Inherent Risk Score is determined by asking the supplier about which countries, regions, sectors and high-risk goods are part of their operations, production or supply chain.

Next, the **Unmitigated Risk Score** is evaluated. The Unmitigated Risk Score measures the modern slavery risk that remains after accounting for modern slavery risk controls that have been implemented by the organisation. This is determined by asking suppliers about existing policies, processes, and procedures to reduce modern slavery risks. A supplier's Unmitigated Risk Score determined by whether they were categorised as having inadequate, partial, or adequate risk control.

Finally, the risk scores for each assessed supplier were aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the overall supply chain. The Aggregated Inherent Risk Score indicates the level of risk inherent in Icon's supply chain, including countries or regions of operations, sectors of operation and how employees are recruited. The Aggregated Unmitigated Risk Score indicates the level of remaining risk after accounting for modern slavery risk controls that have been implemented in Icon's supply chain by our suppliers.

3.2 Modern slavery risk assessment of our operations

Most of our direct employees remain located in Australia and New Zealand and are employed in functions or roles which pose low risks of modern slavery. However, the key risk of modern slavery in our operations arises due to some reliance on a migrant workforce with limited English competency and temporary visa arrangements. Icon notes this risk arises predominately in our directly employed construction workforce, which involves the performance of some services with higher risks of modern slavery, such as site maintenance and construction labour.

During this Reporting Period, our project teams monitored operational risks across our Pacific region projects with the majority in Solomon Island. This includes local minimum age and minimum wage requirements. We are aware of in-country reports of 'child-swapping' which is essentially child trafficking.

We have continued to engage with our project teams in these locations to assess these risks and no instances of these practices have been identified.

We discuss how we are addressing operations related risks in section 4 below including further details of actions undertaken by our pacific project teams in 2025.

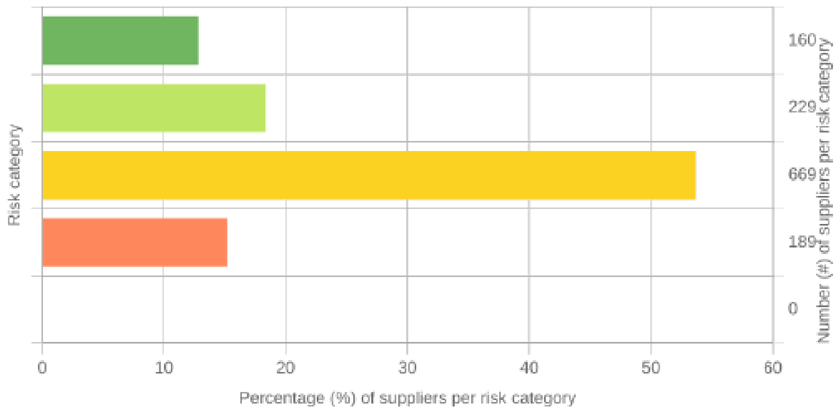
3.3 Modern slavery risk assessment of our supply chain

Using the iPro modern slavery assessment software, we found the majority (54%) of assessed suppliers were categorized as a 'medium risk (partial risk control)', This represents a decrease from the 2024 Statement of 7%. This indicates that these suppliers have a high to moderate inherent risk of modern slavery, based on their Inherent Risk Score, and only partial risk controls, based on their Unmitigated Risk Score.

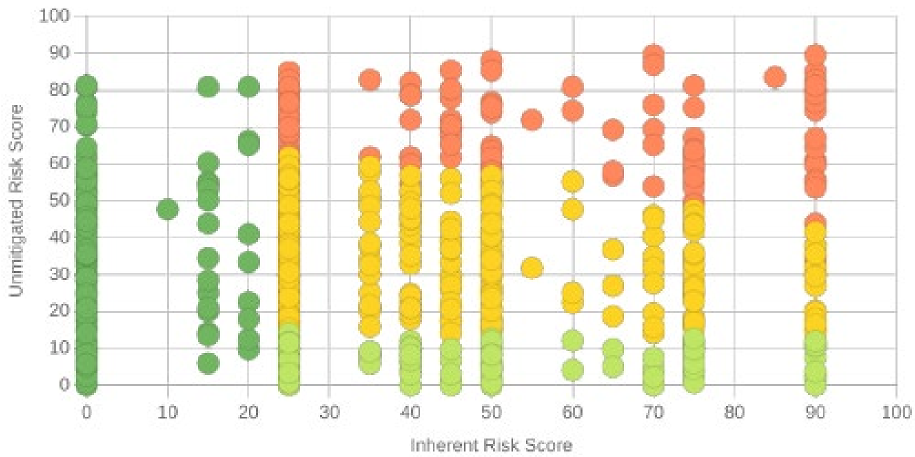
We also found that 15% of assessed suppliers were categorised as 'high risk (inadequate risk control)' which reflects a 6% increase from the 2024 Statement. This indicates that these suppliers have a high to moderate inherent risk of modern slavery, based on their Unmitigated Risk Score, and inadequate risk controls, based on their Unmitigated Risk Score.

We continued to have no assessed suppliers categorised as having 'high risk (high levels of inherent risk), which indicates 'very high' levels of inherent modern slavery risk.

Supplier assessment results



Risk categories	% of suppliers per risk category	# of suppliers per risk category
Low-Risk (No inherent risk)	12.8%	160
Low-Risk (Adequate risk control)	18.4%	229
Medium-Risk (Partial risk control)	53.6%	669
High-Risk (Inadequate risk control)	15.2%	189
High-Risk (High levels of inherent risk)	0%	0



The scatter chart above compares all assessed suppliers according to both their unmitigated risk and inherent risk scores.

Inherent risk of suppliers

In relation to the inherent modern slavery risk of our assessed suppliers, we identified the following.

- 76.5% (2024: 81%) of our assessed suppliers ***had operations in*** one or more high-risk sectors identified in the Global Estimates of Modern Slavery as one of forced labour exploitation, with the majority of these suppliers operating in the construction, manufacturing and building services sectors.

- 53.5% (2024: 41.1%) of our assessed suppliers ***produced goods or provided services in*** one or more high-risk sectors identified in the Global Estimates of Modern Slavery as one of forced labour exploitation, with the majority of these producing goods or supplying services in the construction, manufacturing and building services sectors. For example, aluminum, garments, vinyl, gloves and toys in China, soccer balls in India and furniture in Vietnam, which are considered to have a high-risk of modern slavery.

- 67% (2024: 61.3%) of our assessed suppliers ***sourced goods or services from*** one or more high-risk sectors identified in the Global Estimates of Modern Slavery as one of forced labour exploitation. The construction and manufacturing sectors were the most highly represented. For example, textiles (jute) from Bangladesh, aluminium, electronics, footwear, garments, gloves, lithium-Ion Batteries, Polyvinyl Chloride (PVC), solar cells, solar modules, textiles and toys from China, garments, leather goods, soccer balls and stone from India, textiles from Pakistan, rubber gloves from

Malaysia and furniture, footwear and textiles from Vietnam, which are considered to have a high-risk of modern slavery.

- Other high-risk sectors in which our first-tier suppliers operate, produce and source goods from sectors including retail, wholesale and transportation and storage.

It is not clear from our ongoing iPro assessments whether the specific high-risk goods listed above are procured by Icon, just that they are produced or sourced by one of our first-tier suppliers. During the next reporting periods, we intend to review and utilize the iPro procurement records and engage with our high risk suppliers to confirm the status and then develop sustainable procurement policies for both directly and indirectly sourced goods to mitigate the risks for both forms of procurement.

The construction sector remains highly vulnerable to modern slavery practices. We understand from our previous risk assessments that there are several factors which increase the risk profile for modern slavery in the construction sector, including:

- outsourcing;
- contract terms with competitive margins and pressure on delivery times;
- limited visibility over supply chains and sub-contracting arrangements;
- use of labour hire providers;
- sub-contractor providers not having appropriate systems in place to ensure they meet minimum requirements;
- (to the extent applicable) operations in high-risk jurisdictions, such as the Pacific region, where there are lower labour standards and protections for workers.

Risk controls of suppliers

In relation to the modern slavery risk controls of our assessed suppliers, we maintained or identified the following improvements across risk controls from the 2025 reporting period:

- 65% (2024: 61%) of assessed suppliers issue a policy prohibiting all forms of discrimination
- 20% (2023: 16%) of assessed suppliers conduct a formal vulnerability assessment of their works to slavery and human trafficking
- 100% (2023: 100%) of suppliers have some element of work to undertake to address Modern Slavery supply chain risk
- 70% (2023: 70%) of assessed suppliers issue a policy explicitly ensuring wages meet applicable host country legal requirements
- 48% (2023: 44%) of assessed suppliers issue a policy prohibiting the procurement of commercial sex acts during the length of a contract
- 63% (2023: 58%) of assessed suppliers issue a policy explicitly prohibiting all forms of forced labour and human trafficking
- 52% (2023: 49%) of assessed suppliers issue a policy prohibiting charging recruitment fees

In the next reporting period, we intend to engage with Commercial Managers and project teams to directly engage with their high-risk suppliers identified by iPro to ensure the risk mitigation actions identified in iPro have been identified, discussed, documented in the contracts and completed prior to Practical Completion of the Subcontractor's / Supplier's works. We will report on the outcome of these actions in our next modern slavery statement.

Based on this assessment, the iPro MSAT gave Icon the following aggregated supply chain risk scores:

Inherent risk score **33.01** out of 100	The level of risk inherent to your supply chain, including countries or regions of operation, sectors of operation and how employees are recruited. Inherent risk can be difficult to change, however it is possible to mitigate the inherent risk by implementing policies, processes, and procedures (control mechanisms).
Unmitigated risk score **34.71** out of 100	The level of risk still present after accounting for modern slavery risk controls that have been implemented in your supply chain.

This represents an increase of 9% in our Inherent Risk Score and a decrease of 3% in our Unmitigated Risk Score with an increase of the proportion of suppliers assessed at 42.5% (2024: 34.8%). The total number of High Risk suppliers increase 6% from 9.2% to 15.2% during 2025.

We will continue to use both Scores as a benchmark to evaluate and track the effectiveness of our actions in subsequent reporting periods.

We did not identify any incidences or practices of modern slavery during the 2025 Reporting Period.

4 Actions taken to assess and address modern slavery risks

4.1 Overall approach to modern slavery

The KIH board of directors has overall responsibility for our Modern Slavery policy and processes and their implementation to comply with legal and ethical obligations. Managers at all levels are responsible for ensuring those reporting to them also understand and comply. We expect our employees, contractors and suppliers to raise concerns about suspected modern slavery associated with the Company or our partners or suppliers. Our tenderers are also advised during the tender interview of our processes, and our Code of Conduct clearly establishes the expectation that modern slavery concerns must be reported.

If Icon is found to have caused or contributed to an actual instance of modern slavery, our immediate priority would be the safety and wellbeing of the victim and then to work with the supplier(s) in question to facilitate change of practices to minimise the risk of recurrence. Specific remediation activities would be determined on a case-by-case basis to ensure the most appropriate and effective actions are undertaken.

4.2 Direct employment

Icon's recruitment practices require that:

(1) labour hire used for site-based labour is sourced via registered recruitment agencies and a number of subcontracting companies here in Australia and the workers benefit from an industrial instrument;

(2) every successful applicant must provide proof of age which is collected prior to commencement;

(3) Icon meets relevant construction based minimum entitlements when engaging candidates;

(4) all candidates who are offered employment have the opportunity to voluntarily accept by signing an employment agreement with Icon.

4.3 Internal policies and procedures

Over the last reporting period, Icon has rolled out a new Whistleblower Policy and Recruitment Policy that not only includes an anonymous reporting hotline in partnership with an independent third-party provider, PKF Integrity and we have implemented a global anonymous reporting hotline with Kajima. This expanded service allows all employees, subcontractors and partners to report unethical, illegal, or undesirable conduct through multiple channels.

Icon has also continued to refine and update our internal training and embed this across the business.

We continued to support our project teams understanding of the modern slavery policies, procedures and systems in 2025 through ongoing project level engagement.

4.4 Supplier onboarding, engagement and compliance

In December 2025, as part of Icon's ongoing use of the iPro MSAT to assess supply chain risk, all existing suppliers were requested to complete the iPro assessment process as described in section 3.1 above. By the end of the Reporting Period, 1247 of our suppliers had completed the assessment.

During the 2025 period, in addition to continuing the actions noted in our 2024 Statement, we updated our supplier processes and risk mitigation actions as follows:

- Q2 2025 - completed the implementation of the **ProcurePro** procurement software (purchased Q4 2024). The system enables us to:
  - Drive greater consistency and compliance of project teams with group procurement requirements and approvals including Modern Slavery compliance
  - The uploading of iPro documents and visibility for reviewers and approvers to access these and review the risk mitigation actions documented in the related scopes of work.
  - Adds project, divisional and group reporting, availability and transparency of the procurement status across all projects and trades including Modern Slavery compliance documentation.
- Q3 2025 - delivered briefings to all Divisional Commercial Managers to provide a refresh of our processes and new and existing supporting software and to promote greater leadership, adoption and implementation of our compliance process and tools to their project teams
- Ongoing - provided adhoc direct project team support via the Group Business Systems Manager to support and assist our clients in their compliance and risk mitigation requirements and to enable project teams to familiarise our subcontractors with their obligations and improve their compliance efforts.

- Q4 2025 – promotion of the new iPro Continuous Improvement Library that suppliers can subscribe to obtain training and policy templates to improve awareness and compliance. As of December 2025 we have 14 supplier subscribers enrolled.

New suppliers for our construction projects continue to undergo a staged accreditation process, to verify financial viability, compliance with OWH&S standards, and alignment with Icon's commercial, policy and operating requirements.

This process continues to include confirming their commitment to our Modern Slavery Policy, Supplier Code of Conduct, and related procurement requirements, documentation and approvals.

Icon's suppliers remain contractually required to:

- participate in and provide required information for any audits Icon may wish to conduct to ensure modern slavery compliance; and
- promptly report any modern slavery risks, issues or other information relevant to suppliers' modern slavery obligations to Icon.

Offshore Procurement Team

During 2025, Icon maintained engagement with our Offshore Procurement Team, which oversees sourcing of Joinery and Façade, typically from China. Previous risk assessments indicate that this type of procurement carries product and geography-based modern slavery risks.

During 2025 the Offshore Team engaged with all offshore suppliers to ensure their completion of surveys and risk assessments with significant improvement noted.

The Offshore Team continue to explore practical ways to leverage offshore resources and the international mobility of the Australian-based Offshore Procurement Team to enhance supplier inspections of suppliers, including prescribed checklist items, to mitigate the risks identified in their Suppliers risk assessments.

Our Offshore Procurement Team did not identify any incidences or practices of modern slavery during the 2025 Reporting Period.

Pacific Projects

During 2025 we engaged in greater detail with the commercial teams on our Pacific projects to review current risk mitigation actions and further opportunities for improvement. Our Solomon Islands project remains active, and we reviewed the management of medical costs, minimum wage adherence and ID checks on this project:

<u>Medical Costs</u>
These are not required for onboarding staff however if required Icon pay for this. A medical allowance is provided to all staff in the Reeves (JV partner) business and a full time doctor is available and paid by the project for all site workers

<u>Minimum Wages</u>
Solomons Island Labour Act is fully complied with and additional allowances for medical, phone and housing are provided

ID Checks

Most staff lack formal identification. If hired, they are required to register for the Solomon Island National Provident Fund (SNPF), provide their DOB and confirm the information is accurate. Once received their SNPF card acts as their main form of ID.

4.5 Other Actions

Other actions to improve our Modern Slavery compliance and mitigate risks implemented during 2025 included:

- A review of the iPro Supplier database to remove duplicate and redundant suppliers and supplier data to increase the reliability and accuracy of our data and reporting.

  Together with decreases due to reduced business turnover this resulted in a significant decrease in our total number of suppliers in 2025 to 2934 (2024: 4409).

  This work included updating email addresses, contacts and company details and cross checking this data with the Suppliers and our project teams to improve the accuracy of our records.
- Refined and updated our internal training content to improve our mandatory compliance training for all internal employees this included a more targeted program to drive greater compliance.
- We have been more targeted and deliberate at engaging and identifying more effective methods to engage with priority existing suppliers who are categorized as high risk to target potential risk mitigation actions using iPro's recommended risk mitigation action plans as a guide. This included identification of high value, high risk suppliers and promoting direct divisional and project team engagement to improve the status quo.
- Drafting updated Divisional and Board Reporting proformas to efficiently and effectively communicate the Divisional Modern Slavery auditing, training status, new risks and issues and the progress status of our current year Statement commitments.

  This divisional content is collated and summarized in the draft Board Report.

  In the next reporting period we intend to review both drafts and consult with the relevant internal stakeholders to refine and agree the content, prior incorporating into the existing company reporting processes.

4.6 Internal training

In addition to the training undertaken with our Offshore Procurement Team, we continued to support our project teams and used our internal project review processes as opportunities to brief individual project teams across Icon.

Icon-wide training continued in 2025 including the mandatory training in our Learning Management System (LITMOS) and live briefings delivered to managers and project teams.

5 Assessing the effectiveness of our actions

During the Reporting Period, we actioned the commitments in our 2025 statement to assess and address modern slavery risks in the operations, projects and the broader business.

We remain committed to exploring practical and technological solutions to enhance project team and supplier engagement to improve the identification and mitigation of Modern Slavery Risks including working with our technology providers iPro and ProcurePro.

5.1 Assessing effectiveness

The iPro software uses KPI's to benchmark our efforts by reference to the Inherent Risk Score and Unmitigated Risk Score given to each supplier and the Aggregated Risk Scores given to Icon (see a description of these scores in section 3.1). Icon continue to use the Aggregated Risk Score as a benchmark to monitor and assess the effectiveness of its risk-mitigation actions across our entire supply chain in future reporting periods.

We aim to establish reporting processes that utilize individual supplier scores to track progress and evaluate effectiveness of actions taken by high-risk suppliers.

5.2 Future actions to address modern slavery risks and measure our effectiveness

During the next reporting period, we will enhance the promotion, implementation and effectiveness of our modern slavery compliance systems and processes through the following measures:

- Continuing our annual supplier survey of our entire supply chain using the iPro MSAT commencing late 2026 and targeting a year-on-year improvement from the participation rate of 42.5% in 2025.
- Implementing increased compliance and awareness of Modern Slavery compliance and risk mitigation in our New Zealand business aligned to the future New Zealand Modern Slavery Act and the existing Australian Act requirements.
- Targeting adherence to our supplier onboarding process embedded within our pre-procurement procedures and contract administration processes which utilizes IPro's assessment and risk-mitigation tools via our new ProcurePro and refreshed group commercial audit programs.
- Refresh our internal training program to deliver mandatory compliance training for all internal employees during 2026, with a target to ensure 100% awareness of Modern Slavery policy and actions.
- Using our updated technology and restructure of commercial function and enhanced resourcing to ensure greater oversight and management of more effective methods to mitigate Modern Slavery risks in our supply chain.
- Review our progress in Q1 2027 using the iPro software data benchmarks to assess our progress and identify further mitigation actions for our next statement.
- Fully embed and review the effectiveness of our updated processes and systems of reporting modern slavery risks from project teams to divisional management to the board.

We will assess the effectiveness of our actions by tracking against these goals during 2026 and 2027 and report on progress in our next Modern Slavery Statement.

6 Consultation and approval

In the course of preparing this statement, the Group Business Systems Manager of KIH (who has responsibility for and oversight of the group entities covered by this statement) sought information and engaged with representatives from the group entities covered by this statement, including relevant project teams. This involved reviewing group progress regarding modern slavery actions, discussing implementation of future actions to address modern slavery risks and modern slavery compliance requirements.

This Statement was approved by the Board of Directors in their capacity as principal governing body of Kajima Icon Holdings on 26/06/2026

Michael Read
CEO/Managing Director
Kajima Icon Holdings
Date 26/06/2026