

SEKISUI HOUSE

26 June 2023

Modern Slavery Statement 2022
Sekisui House Australia Holdings

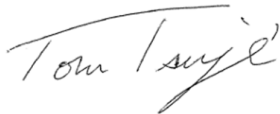
A message from the Group CEO & Managing Director

With more people than ever living in slavery than any other time in history, modern slavery is a critical global issue. Walk Free Initiative's Global Slavery Index 2021 estimates more than 49.6 million people are living in modern slavery on any given day.ⁱ

At Sekisui House Australia Holdings Pty Ltd ("Sekisui House"), we are committed to respecting human rights and playing our part in combating modern slavery. Established in 1989, "Love of Humanity" is a defining principle of our philosophy, and we strive to create happiness for all stakeholders throughout our business and with everything we do. We are committed to identifying and combatting modern slavery both in our own business operations, controlled entities, joint ventures, and throughout our supply chain. We know this is a significant responsibility and not one that we take lightly.

In 2022, we have assessed our supply chain to better understand our modern slavery risk and reviewed our current modern slavery activities and controls to inform where we can improve. We believe that by continuing to improve our modern slavery response, we will be able to deliver our mission of providing secure, safe, and healthy housing and services that contribute to a sustainable society.

Yours sincerely



Toru Tsuji

Sekisui House Australia Group CEO and Managing Director



Hirotohi Katayama

Sekisui House Australia Executive Director

This joint statement was reviewed and approved by the Board of Sekisui House Australia on 26th June 2023. This statement is approved on behalf of Sekisui House's owned and controlled entities which includes subsidiaries and joint ventures outlined in Appendix A, Table 4

Contents

1	Introduction	4
2	Our structure, operations and supply chains	4
3	Identifying modern slavery risks	8
4	Our approach to managing modern slavery risks	9
5	Assessing the effectiveness of our actions	11
6	Looking ahead	14
7	Appendix	15

1 Introduction

Modern slavery is an umbrella term used to describe a range of practices that involve the serious exploitation of people through coercion, threats or deception used to undermine their freedom.

Our approach to managing modern slavery risks is guided by the United Nations Guiding Principles concept of cause, contribute and directly linked' as set out below:

- **Cause** - We may cause harm to people if our own actions directly result in such impacts.
- **Contribute** - We may contribute to harm to people if the actions or omissions in our operations or supply chains contribute to such impacts. Such as through our direct supplier relationships.
- **Directly Linked** - Our operations, products or services may be directly linked to modern slavery through the activities of another entity with whom we have a business relationship, such as with a joint venture partner or supplier, or through entities we do not have a direct contractual relationship with such as a supplier further down our supply chain.

This year, with the support of an external consultant, we conducted a modern slavery risk assessment of our direct suppliers. Out of the total 29 supplier categories that were assessed, nine were found to have a medium-high or high risk rating. We also undertook a gap analysis of our modern slavery risk management framework and response. The analysis looked at our current processes and controls and a series of recommendations were provided to improve our management of modern slavery risks.

In the future, we are committed to progressing in our modern slavery efforts and we aim to implement the recommendations from the risk assessment and gap analysis, as well as the outstanding activities carried over from our 2021 statement.

2 Our structure, operations and supply chains

Sekisui House Australia Holdings Pty Ltd is an Australian entity, operating under its immediate and ultimate Japanese parent entity Sekisui House, Ltd. ("SHL"). Sekisui House is a leading property developer and home builder. We are proud to be one of the fastest growing community developers in Australia.

At Sekisui House, we believe that an enduring and sustainable society is one that is based on a balanced, global eco-system, where all people can live in comfort. Our purpose is to create homes and communities that improve with time and last for generations. This is achieved by ensuring we maintain four core values in sustainable urban development – social, environmental, economic and residential value.

- **Social value:** perpetuating and developing local culture and building communities. At Sekisui House, we achieve this in the master planning design process through considered preservations of existing trees and natural features, and careful planning of walkways and cycleways to encourage residential interaction.
- **Environmental value:** preserving natural ecosystems and reducing the development's impact on the environment. We achieve this is through integrating walkways and cycleways into our developments to reduce the need for vehicle transport and implementing projects to promote indigenous flora.
- **Economic value:** maintaining and enhancing the value of the homes and communities, revitalising local economies and consideration of the long-term infrastructure needs of the communities in which we build.

- **Residential value:** long term comfort and security of dwellers, applying Universal Design Principles, community health and fitness considerations, and offering diverse housing types and amenities to cater to different generational and lifestyle needs.

Owned & Controlled Entities and Joint Venture Partners

This is a joint statement prepared by Sekisui House, which covers all entities owned and controlled by Sekisui House. Please see Appendix A, Table 4 for a full list of the entities owned and controlled by Sekisui House. Management of both reporting entities and owned and controlled entities is consolidated into one management structure including corporate policies, governance structures and due diligence activities.

Sekisui House is an unincorporated joint venture partner with Payce Consolidated Pty Ltd for the Melrose Park Developments, as well as the Bayswater, EMT and Ferry Wharf Terminal Developments. Sekisui House also has an unincorporated joint venture partnership with Frasers Property Group for the Central Park Development. Our unincorporated joint ventures listed in Appendix A, Table 4 are included in this statement.

Serrata Development Pty Limited is a partially owned joint venture with Lendlease Development, Appendix A, Table 5. This joint venture is not included in this statement.

Throughout this statement, where reference is made to Sekisui House, for example in describing risks of modern slavery, this should be taken to cover the activities of all reporting entities listed in Appendix A, Table 4. This statement was prepared by Sekisui House, with input from stakeholders across the group business. At Sekisui House, we operate our entire business as one entity, with directors from our owned and controlled entities part of Sekisui House's board. As such, direct engagement with our subsidiaries and joint venture beyond these directors did not take place.

Engagement with Sekisui House, Ltd. (SHL)

We have regular communication and discussion with the SHL Human Relations Office (SHL HRO) to work together on the Human Rights due diligence activities including our modern slavery response. We exchange information and opinions regarding efforts to respect human rights with the SHL HRO.

For 2022, SHL HRO initiated a Human Rights DD Self-Assessment Questionnaire where we reviewed and answered the questions with follow-up discussion scheduled to take place for 2023 together with the representatives from the SHL Environment Improving Department, SHL Procurement Department and the SHL International Business Department's General Affairs Group.

Our Business

Our business (which includes our subsidiaries) is structured around two build-to-sell options for our customers in Australia:

1. **Apartment & Mixed-Use Developments:** We project manage multiple apartment development projects, including Melrose Park, Sanctuary, The Orchards, Ripley Town Centre, West Village and Coolum. Management of Apartments Developments activities, such as design, capital works, sourcing, construction and maintenance are outsourced to contractors.
2. **Residential Communities and Home Building:** Our development activities include the acquisition of land, council approvals, civil works and design, and construction of residential buildings. We also have oversight on sourcing materials and manufacturing and manage the onsite construction activities outsourced to contractors.

Our **Corporate** function has oversight of Capital and Investment, Human Resources, Information and Communications Technology, Administration, Finance/Accounting and Corporate Marketing to

support the two home-building activities. Corporate functions are mostly managed internally. However, several functions including marketing and sales are outsourced to third parties.

Figure 1 below sets out our corporate activities, with an indication of which activities we undertake internally, and those that we do not manage internally.

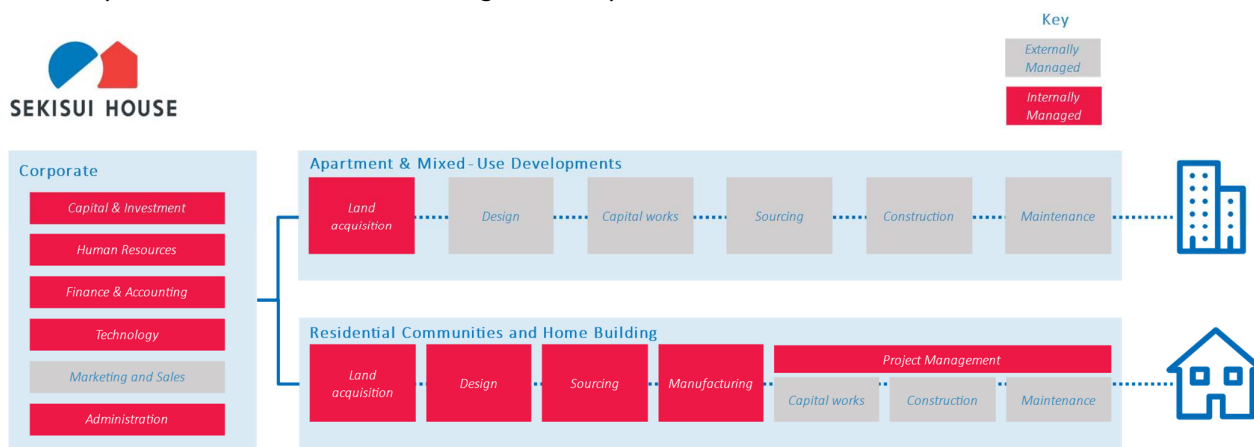


Figure 1: Sekisui House Value Chain

Corporate governance structure

We have a robust and clearly defined corporate governance structure. Our Executive Team, which includes our Executive Director and Chief Financial Officer (CFO) and General Manager, is led by our Group CEO and Managing Director, who has the ultimate responsibility for approving this Statement and implementing the commitments we make. Our Development Directors are responsible for Group sourcing decisions, including having accountability for identifying, assessing and remediating any potential instances of human rights violations.

Operations and people (workforce)

Our workforce consists of a range of specialised individuals who operate within professional services, manufacturing (at Sekisui House factories), capital investments for purchasing land and developments, surveying and skilled trades.

Our direct workforce are all professionals and are based in Australia. A proportion of our employees were transferred to Australia from our parent entity SHL in Japan. During the reporting year, a total of 17 expatriates were transferred to our Australian firm. For some specialised corporate roles, such as sales and marketing, external Australian-based agents are utilised.

In 2022, Sekisui House employed 186 people, of whom 90% worked in full-time roles. The remaining employees are either employed on a part-time or contractual basis. Table 1 sets out the employee breakdown for the reporting period.

Table 1: Breakdown of Sekisui House workforce

Employment type	Number	% of total workforce
Full Time	168	90.32%
Part Time	6	3.22%
Contract	12	6.45%
Total	186	100%

Suppliers

In 2022, we undertook a modern slavery risk assessment across 1546 suppliers from a range of goods and services. The majority of our expenditure was for materials and services in relation to our construction projects. Furthermore, the majority of our expenditure come from products and services procured in Australia. Table 2 below provides insight into the top procurement categories for Sekisui House in 2022.

Table 2: Breakdown of top procurement categories in 2022

Nature of good or service	Number of Suppliers	% of total spend	
Services	Construction	127	49.580%
	Legal	39	25.350%
	Marketing	386	14.170%
	Consulting	297	4.456%
	Maintenance	189	1.361%
	Recruiting	30	1.318%
	Logistics	17	0.716%
	Utilities	28	0.433%
	Telecommunication	14	0.420%
	Engineering	21	0.281%
	Cleaning	35	0.202%
	Office services	62	0.183%
	Product hire	18	0.170%
	It services	16	0.146%
	Catering	40	0.131%
	Security	14	0.103%
	Printing	16	0.055%
	Training	50	0.050%
	Travel	10	0.043%
	Translation services	4	0.001%
Goods	Software	21	0.283%
	Forest products	10	0.262%
	Tech hardware	11	0.175%
	Office goods	66	0.088%
	Electronic equipment	12	0.012%
	Apparel	8	0.008%
	Industrial machinery	3	0.005%
	Metal	1	0.001%
	Textiles	1	0.001%

3 Identifying modern slavery risks

At Sekisui House, we recognise that we have complex supply chains and are exposed to many human rights risks. In 2022, we engaged a consultant to assess the modern slavery risks in our tier 1 suppliers to identify modern slavery risk.

The external consultants we engaged used an iterative process. Leveraging supplier data across the two most recent financial years, they performed data cleansing procedures before inputting the final data extract into a modern slavery risk assessment tool. The suppliers that were assessed represented 99% of our total spend. Of our tier 1 suppliers,¹ 29 supplier categories were assessed across country risk, industry risk and industry controversy risk and provided with an overall risk rating.

Understanding geographic risks

Globally, every country has some form of modern slavery, however certain regions and countries carry a higher risk of modern slavery. There are multiple drivers of modern slavery that contributes to an increased likelihood of modern slavery practices occurring.

This year, we prioritised undertaking a geographic risk assessment on suppliers providing services (but not goods) to Sekisui House. We acknowledge that whilst many of our suppliers are based in Australia, a high number of the goods used in our business are sourced from outside of Australia where there is more inherent geographic risk.

Understanding industry risks

Within each industry, certain goods and services also carry an inherent risk of modern slavery. This can be due to certain workforce characteristics that are known to correlate with modern slavery practices, such as: low pay, low skill, lack of legal protections and/or high degree and volume of manual labour.

This year, we assessed our goods and service suppliers based on their respective industries to understand which areas of our supply chain posed a higher risk of modern slavery. To accompany our analysis of industry risk, a literature and media review was conducted into each industry to identify controversies as they relate to ESG topics. These results were fed into the overall industry risk rating.

Findings

In our assessment we found that 68% of the suppliers assessed had below medium risk rating. Out of the total 29 supplier categories that were assessed, nine were found to have a medium-high or high risk rating, as highlighted below:

Table 3: Sekisui House's higher risk industries

<i>Nature of good or service</i>	<i>Number of Tier 1 suppliers</i>	<i>Overall Supplier Risk Rating</i>
<i>Goods</i>		
Forest Products	10	High
Textiles	1	High
Apparel	8	High
Electronic Equipment	12	High

¹ Tier 1 suppliers refer to our direct suppliers that Sekisui House has a direct spend relationship with for goods or services. Tier 2, 3, 4 etc are suppliers further down our supply chain which we do not have a direct relationship with.

	Tech Hardware	11	Medium High
	Metal	1	Medium High
Services	Catering	40	Medium High
	Cleaning	35	Medium High
	Construction	127	Medium High

Our risk assessment found that procured goods hold a greater risk of modern slavery than services supplied to our business, despite having a much lower portion of our total spend (approximately 1%).

At 50% of our total spend, construction services were the highest percentage of spending compared with other categories assessed. We understand that construction services not only carry modern slavery risks for workers on our sites, but risk is also embedded through materials used such as timber and metal. We understand that by focusing on mitigating risk in this area and applying leverage through our high spending, our business can play an effective role in identifying and responding to modern slavery practices which may be occurring in this industry.

Ongoing impact of COVID-19 on modern slavery

Human rights and modern slavery risks continue to be impacted by the flow-on effects of the COVID-19 pandemic. Labour shortages, coupled with sharp increases in demand for particular goods and services can place strain on supply channels and invite circumstances that lead to labour exploitation. Those most vulnerable to exploitation continue to be at risk as global economies re-adjust with increasing casualisation of the workforce and the rise of the gig economy.

4 Our approach to managing modern slavery risks

Our approach to managing modern slavery risks is built around our strong policy and governance framework. Our Human Rights Policy details our commitment to integrate human rights due diligence processes in our business activities, in line with the United Nations Principles on Business and Human Rights. As a demonstration of our commitment, Sekisui House is a signatory of the United Nations Global Compact.

Commitment and Governance

We strive to uphold the principles outlined in our Human Rights Policy and our Code of Conduct to provide fair and equal employment opportunities within our operations.

We maintain a strong policy framework. Our policies reflect the core principles and expectations of employer and employee conduct and function to support our broader commitment to upholding human rights (see Appendix B, table 6 for a complete list of policies). Relevant policies include:

- Human Rights Policy
- Risk Management Policy
- Procurement Policy Home Building
- Procurement & Purchasing WHS&E Manual
- Code of Conduct
- Australian Whistleblowing Policy

Due Diligence

In our operations, given the controls we have in place and the generally low-risk nature of our direct employees, we consider our existing policies and processes to provide effective controls for the risk of modern slavery.

We follow principles to ensure appropriate conduct towards suppliers is maintained and choose only reputable suppliers that align with our values and commitment to excellence.

Our Procurement and Estimating team are responsible for ensuring we achieve the best outcomes in terms of both price and quality when sourcing goods and services. We procure only from reputable suppliers within the industry and this requirement is specifically weighted in our Home Building Procurement Policy. We pride ourselves on having deep longstanding relationships with our suppliers.

Our Procurement & Purchasing WHS&E Manual outlines the responsibilities for procurement, thresholds, assessment and ongoing monitoring of suppliers and required actions. We also keep a list of suppliers, with some high-level transparency over the type of procurement, acknowledging that this does not include individual supplier transactions to be kept for a given reporting period.

The modern slavery risk assessment conducted this year will inform the development of our modern slavery due diligence processes in the coming year/s. Current informal controls in place to mitigate the risks of modern slavery in our supply chain include:

- sourcing from Australian suppliers for many of our building materials
- having stringent quality control processes in place for all construction materials
- having all corporate spend above \$5000 reviewed and approved by the Chief Financial Officer.

Taking the insights from our modern slavery risk assessment, we will look to formalise our commitments to supply chain due diligence. Specifically, we will develop a Supplier Code of Conduct that sets out our expectations for our suppliers' management of modern slavery risks and will establish ongoing due diligence processes to identify, manage and mitigate risks of modern slavery in our supply chains.

Supplier risk management

We have been working to uplift our risk management activities. While we currently don't have specific modern slavery controls in place, we do have a number of corporate controls that are fundamental to supporting the management of our human rights risks and compliance with laws, regulations and contractual obligations.

In 2022, we updated our Risk Management Policy to support Sekisui House's risk management approach. Our risk management framework seeks to apply risk management across the organisation, so that all material risks can be identified, assessed and mitigated. Under the supervision of the Sekisui House Directors, managers are responsible for designing and implementing risk management and internal control systems to manage Sekisui House's material business risks. The next step is for us to embed modern slavery risks within our risk management framework.

We will also seek to incorporate modern slavery risk management into our critical business activities, functions, and processes so that understanding of modern slavery issues can appropriately inform our decision-making at every level.

Given the nature of procurement in construction, we are committed to working with our project partners – including contractors and joint ventures to ensure appropriate controls and oversight for the management of modern slavery risk.

On-site risk management

Our on-site operations are governed by a diverse team that includes project managers, licensed construction supervisors and internal Quality Assurance team members. We take a proactive and open approach to managing our on-site operations. Any potential issues such as potential WHS breaches, poor quality standards and employment concerns, including instances of human rights violations, can be directly reported to on-site supervisors.

For our Apartment & Mixed-Use Developments construction sites, every worker working on our sites is required to undertake a site induction which includes work, health and safety (WH&S) and other key information to work safely on site. We have oversight of every worker on our construction sites, through the requirement of each worker to scan in with a QR Code each day. Data is collected and accessible to us from builders we contract relating to WH&S, injuries, workers' residency status, work permits, insurance, and other information.

On every Residential Communities and Home Building construction site, one of our personnel oversees workplace health and safety for all workers, including inducting all contractors and sub-contractors onto site.

Remediation

Sekisui House is committed to openness, probity, and accountability. We provide a number of separate whistleblowing services internally. Our channels for reporting grievances are clearly communicated in our Australian Whistleblowing Policy, as well as the Employee and Contractor Manuals. Stakeholders, including both direct employees and employees of our suppliers, can make anonymous reports to the relevant Authorised Disclosure Officers. The contact details of these Officers are provided to all stakeholders via the policies and manuals mentioned above. Internal employees can also raise personal work-related grievances by following the processes outlined in the Grievances and Complaints Policy located on the Employee Connect service. In future, we will look to define a specific approach to responding to modern slavery grievances, and remediation. We aim to ensure a clearly streamlined process is in place for addressing instances where there is an adverse impact linked to our direct operations or supply chain.

5 Assessing the effectiveness of our actions

To review the effectiveness of our modern slavery response, we enlisted the support of an external consultant to analyse our current processes and a series of recommendations aimed at improving the oversight and management of modern slavery risk in our supply chain and operations.

The framework used to assess our response is based on international human rights frameworks, including the *United Nations Guiding Principles on Business and Human Rights*, *IOS 20400*, the *OECD Due Diligence Guidance for Responsible Business Conduct* and the *OECD-FAO Guidance for Responsible Agricultural Supply Chains*.

	Review findings	Recommended next step
Commit Do we have a clear commitment to addressing modern slavery and taking action against adverse impacts?	<p>While we have a clear commitment to human rights and modern slavery in our Human Rights Policy, several existing policies in place including our Anti-discrimination and Equal Opportunity, Whistleblowing, General Code of Conduct and Procurement Policy, do not make any direct links to social and human rights protection.</p>	<p>Establish a modern slavery working group with representatives from relevant business units to enhance the functioning and oversight of modern slavery controls.</p>
Assess How mature is our approach to assessing modern slavery risk in the supply chain?	<p>Currently, when we are going through a supplier selection or tender process, we have mechanisms in place to assess and rate suppliers. These mechanisms assess the suppliers based on price and other market qualities but there is no formal process in place that considers modern slavery risk in procuring goods and services.</p> <p>With regards to product, industry and country risk there is a broad understanding within our tier 1 supply chain and key supplier locations.</p>	<p>Develop a process to survey suppliers aligned to a Supplier Code of Conduct.</p> <p>Conduct surveys with tier 1 suppliers that are of higher risk and begin to map our tier 2 suppliers taking into consideration both country and industry risks of these suppliers.</p>
Adapt & Address What processes are in place to mitigate identified risks by adapting systems and procedures? What systems are there to remediate adverse modern slavery impacts?	<p>Our current due diligence controls are outlined in our Procurement & Purchasing WHS&E Manual, which provides guidance for procurement with respect to the selection and ongoing monitoring of suppliers.</p>	<p>Develop a risk-based approach for modern slavery due diligence of suppliers that includes: supplier management through identifying risks, measuring progress against managing those risks, conducting surveys with high-risk suppliers and quarterly executive meetings with high-risk suppliers.</p>
Track What processes do we have for monitoring systems to identify, mitigate, and remedy adverse modern slavery impacts?	<p>While we understand the importance to have continual monitoring and evaluation. We do not currently have a system in place that monitors and evaluates the effectiveness of our systems and processes for controlling modern slavery risks in our supply chains and operations.</p>	<p>Establish an approach to assess the effectiveness of actions to identify, manage and mitigate modern slavery risks in our operations and supply chain. Apply this framework on an ongoing basis.</p>

<p>Communicate</p> <p>How do we communicate internally and externally on modern slavery due diligence? Do we actively engage with stakeholders on modern slavery?</p>	<p>It was identified that while we have strong, long-standing relationships with our suppliers, more could be done to establish clear and consistent communication with respect to modern slavery issues and supply chain due diligence expectations. It was also recognised that more could be done to enhance internal knowledge and awareness of modern slavery.</p>	<p>Conduct modern slavery awareness training for internal stakeholders, starting with key business units that work closely with our suppliers.</p>
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6 Looking ahead

We are committed to maturing our approach to managing modern slavery risks in our operations and supply chain. We will carry forward from our 2021 statement the following actions to undertake:

1. Create specific supplier code of conduct aligned to broader code of conduct and targeting modern slavery expectations. Communicate it to all suppliers and work with the procurement team to update processes and procedures as required.
2. Amend our Risk Management Policy to clearly articulate how internal controls and systems should relate to modern slavery risk management, and assign appropriate roles and responsibilities
3. Develop an approach to assessing the effectiveness of our actions on an ongoing basis
4. Introduce additional requirements for suppliers of materials with a high risk of modern slavery during the tender process. This involves the development of sourcing requirements for high-risk materials to be applied across both Residential Communities & Home Building and Apartment Developments business units
5. Provide our general managers and procurement staff with training and capability development to enhance the understanding of modern slavery risk and associated prevention and mitigation actions

Taking the recommendations from our gap assessment, we also propose to perform the following activities in the next reporting period:

1. Articulate modern slavery program vision
 - a. Work with affected stakeholders to define and articulate the vision for a modern slavery program including different procurement relationships e.g. JV partners
 - b. Set clear expectations for the boundaries and goals of the program including setting clear metrics and targets
2. Governance, policies and standards
 - a. Establish a modern slavery working group with representatives from relevant business units with clear lines of accountability up to the executive team. Develop a work plan and update annually.
3. Monitoring and reporting
 - a. Establish data collection and verification approach for all targets and measure of performance
4. Grievance mechanism and remediation
 - a. Review grievance mechanism available to workers in supply chain and consider options appropriate to this sector.
5. Supplier Risk Management
 - a. Perform a deeper review of supply chain structure of highest risk suppliers e.g tier 2 suppliers based on the results of our external consultant's risk assessment.
 - b. Use results of our external consultant's risk assessment to identify focus areas. Develop a risk mitigation action plan for these defined focus areas.

Appendix A: Sekisui House owned and controlled entities

Table 4: Owned and controlled entities and joint ventures - Sekisui House Australia Holdings Pty Ltd

Subsidiary (Tier 1)	Subsidiary (Tier 2)	Subsidiary (Tier 3)
SH Melrose LAND Pty Ltd	-	-
SH Melrose DM Pty Ltd	-	-
SH Homebush St Tropez Pty Ltd ATF SH Homebush St Tropez Unit Trust	Henlia No. 2 Pty Ltd -	Homebush St Tropez Pty Ltd (Nominee)
SH HB Finance No. 2 Pty Ltd	SH HB Finance No. 1 Pty Ltd	-
SH Homebush Peninsula Pty Ltd ATF SH Homebush Peninsula Unit Trust	Henlia No. 11 Pty Ltd -	Homebush Peninsula Pty Ltd (Nominee)
SH Homebush Alora Pty Ltd ATF SH Homebush Alora Unit Trust	Henlia No. 17 Pty Ltd -	Homebush Alora Pty Ltd (Nominee)
SH Baywater Investment Pty Ltd	SH Baywater Development Pty Limited	-
SH FWT Investment Pty Limited	SH FWT Development Pty Limited	-
SH Melrose Investment 1 Pty Ltd	SH Melrose Development 1 Pty Ltd	-
SH Melrose Investment 2 Pty Ltd	Melrose Park Development 1 Pty Ltd	Melrose Park UJV
	Melrose Park Development 2 Pty Ltd	
	Melrose Park Development 3 Pty Ltd	
	SH Melrose Development 2 Pty Ltd	
SH EMT East Investment Pty Ltd	SH EMT East Development Pty Ltd	-
SH EMT West Investment Pty Ltd	SH EMT West Development Pty Ltd	-
SH WE HILLS INV Pty Ltd	SH WE HILLS DEV Pty Ltd	-
	SH WEST END Pty Ltd	-
Sekisui House West Village Retail Pty Ltd	-	-
SH Melrose PP land Pty Ltd	-	-
SH Melrose PP DM Pty Ltd	SH Yards Development Pty Ltd	-
Henlia No. 9 Pty Ltd	Henlia No. 10 Pty Ltd	Ripley Town Holdings Pty Ltd
	Henlia No. 13 Pty Ltd	-
	Bcove 5 Pty Ltd	-
	Bcove 4 Pty Ltd ATF Bcove4 Unit Trust	-
Sekisui House Australia Pty Ltd	-	-
SHD Services Pty Ltd ATF SHDS Unit Trust	-	-
SHA Finance Pty Ltd	-	-
Sekisui House Mast (NSW) Pty Ltd	-	-
Sekisui House Mast (QLD) Pty Ltd	-	-
Sekisui House Realty (NSW) Pty Ltd	-	-
Sekisui House Realty (QLD) Pty Ltd	-	-

Sekisui House Construction (Australia) Pty Ltd	-	-
Sekisui House Services (QLD) Pty Ltd	-	-
Sekisui House Services (NSW) Pty Ltd	-	-
Sekisui House Services (VIC) Pty Ltd	-	-
Sekisui House Services (SA) Pty Ltd	-	-
SH Central Park Investment West Pty Ltd	SH Central Park Development West Pty Ltd	-
SH Central Park Investment East Pty Ltd	SH Central Park Development East Pty Ltd	-
SH Coolum residences Pty LTD	-	-
SH Coolum Pty Ltd	SH Coolum Western Pty Ltd	-
SH Camden Valley Pty Ltd. ATF SH Camden Valley Unit Trust		-
SH Camden Lakeside Pty Ltd ATF SH Camden lakeside Unit Trust		-
DEVUS Pty Ltd. ATF THE DEVUS Unit Trust	-	-
SH Hill Road Investment Pty Ltd	SH Hill Road Development Pty Ltd	-
SH Orchards Pty Ltd	-	-

Table 5: Partly owned and controlled entities and joint ventures - Sekisui House Australia Holdings Pty Ltd

Name	Type	Joint venture partner	Holding
Serrata Development Pty Limited	Joint Venture	Lendlease Development	50%

Appendix B: Sekisui House Corporate Policies

We maintain a strong policy framework which upholds the value of our organisation. Our policies reflect the core principles and expectations of employer and employee conduct and function to support our broader commitment to maintain human rights.

Table 6: List of relevant Sekisui House policies which guide our operational environment

Policy	Purpose
Code Of Conduct	Our Code of Conduct (“Code”) provides a set of standards required by all employees of SHAH. It supplies information to assist in the understanding of ethical and professional standards of behaviour that apply to all our daily business activities.
Human Rights Policy	Our Human Rights Policy was developed in 2020 to build upon our broader Corporate Philosophy and Code of Conduct, instilled to

	complement and clarify the “Respect for Human Rights”, one of our principles outlined in our Guidelines for Corporate Behaviour.
Procurement Policy Home Building	Our Procurement Policy was developed in 2020 to ensure all Directors, Officers and Employees of Sekisui House adhere to procedures and standards relating to our Procurement Strategy for Home Building projects.
Procurement & Purchasing WHS&E Manual	Our Procurement & Purchasing Policy was established to maintain a system for the purchasing and/or hiring of any materials, equipment, plant and products by Sekisui House. This Policy provides guidelines to ensure the introduction of sourced materials and equipment does not adversely affect the health, safety and environment of Sekisui House employees.
Risk Management Policy	Our risk management policy establishes our framework to apply risk management across our entire organisation, so that all material risks can be identified, assessed and mitigated. This framework is to be applied throughout our portfolio of businesses, geographies, currencies, assets and liabilities.
Australian Whistleblowing Policy	Our Australian Whistleblowing Policy applies to both employees of the Company and employees of a supplier of services or goods to the Company.
Australian Equal Employment Opportunity, Anti-Discrimination And Harassment Policy	This Policy relates to the behaviour of all employees and workers under Sekisui House and outlines our position on equal employment opportunity, unlawful discrimination, unlawful harassment and unlawful victimisation.
Employee Handbook / Contractor Handbook	Provides a collection of the key human capital policies, as detailed above.

Appendix C: Mandatory Reporting Criteria of the Modern Slavery Act (Cth)

Criteria	Page number
Identify the reporting entity	4
Describe the reporting entity's structure, operations and supply chains	4-7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	8,9
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	9-11
Describe how the reporting entity assesses the effectiveness of these actions	11
Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	5
Provide any other relevant information	13