

# MODERN SLAVERY STATEMENT 2022

## 1 Introduction

1.1 This Modern Slavery Statement (**Statement**) is made pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**) by the following companies:

- Kajima Australia Pty Ltd (**KA**) (ACN 604 351 966);
- Kajima Construction Australia Pty Ltd (**KCA**) (ACN 604 354 798); and
- Kajima Cockram International Pty Ltd (**KCI**) (ACN 617 741 018).  
(together, the Reporting Entities, **KA Group**, we, us and our).

This Statement describes the operations and supply chains of the Reporting Entities, their subsidiaries and wholly-owned or controlled entities, the modern slavery risks therein and describes the steps taken by the Reporting Entities to assess and address those risks during the year ending 31 December 2022 (**Reporting Period**).

The wholly-owned or controlled entities which are covered by this statement include the following entities and their related companies:

- Kajima Development Australia Pty Ltd (ACN 604 355 866);
- Icon Developments Australia Pty Ltd (ACN 604 143 099);
- Kajima Icon Holdings Pty Ltd (**KIH**) (ACN 617 584 175);<sup>1</sup>
- Cockram Projects (Shanghai) Construction and Engineering Co Ltd;
- Cockram Construction Inc. (USA based); and
- Scenario Cockram Limited.

## 2 Our structure, operations and supply chains

### 2.1 Structure

The ultimate parent company of the Reporting Entities is Kajima Corporation which is a Japanese publicly listed construction company headquartered in Tokyo. Where this Statement refers to “Kajima” it is a reference to Kajima Corporation and its direct and indirect subsidiaries.

Kajima is made up of a number of legal entities that provide construction, real estate development and other services to third parties. These operations are explained further below in section 2.2 of this statement.

KA is a proprietary company registered in Australia. Its principal place of business is 110 Cubitt Street Cremorne VIC 3121. KA is the highest entity owned by Kajima operating in Australia. KA is the regional holding company for KCA and Kajima Development Australia Pty Ltd.

KCA is a construction holding company wholly owned by KA.

KIH<sup>1</sup> and KCI are wholly owned subsidiaries of KCA.

KCI is KA’s Asia/America holding company and has majority ownership of the following foreign subsidiaries in China, USA, Hong Kong, Macau and Thailand:

Entity name	Location	Operations
Cockram Projects (Shanghai) Construction & Engineering Co Ltd	China	Construction management services
Cockram Construction Inc.	USA	Construction and secondment services
Scenario Cockram Limited ( <b>SCL</b> )	Hong Kong	Rockwork & showset production and installation in Hong Kong, Macau, USA, Thailand and China. <sup>2</sup>

<sup>1</sup> KIH has submitted its own separate modern slavery statement. Refer to that statement in relation to the risks and actions taken by KIH and its owned or controlled entities.

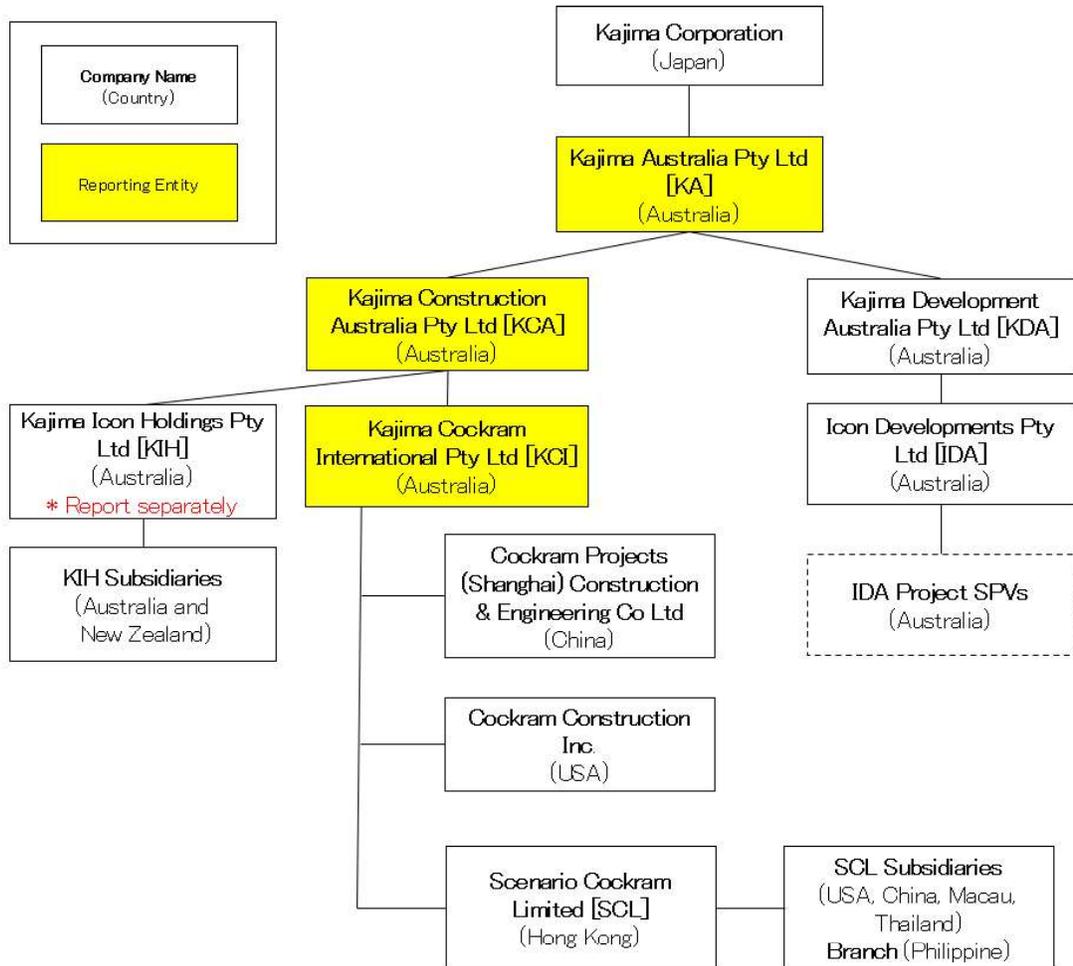
<sup>2</sup> SCL has the plants to make the products, but the process and supply chain of the production is similar to those of construction services.

**SCL** wholly owns Scenario Cockram (China) Limited, Scenario Cockram (Thailand) Limited and Scenario Macau Limited. SCL also wholly owns Scenario Cockram USA Inc.

Kajima Development Australia Pty Ltd (**KDA**) is wholly owned by KA. KDA invests in land developments primarily in Victoria but also in other states of Australia and New Zealand.

Icon Developments Australia Pty Ltd (**IDA**) is a majority owned subsidiary of KDA.

**Structure Diagram**



**2.2 Operations**

KA Group has over 1000 employees across its operations, however, KA, KCI and KCA do not have large numbers of direct employees.

KA is a holding company which controls and supports its subsidiaries which provides construction and real estate development services. KA does not provide them to our clients directly.

KCA is a holding company which controls and supports its subsidiaries which provide construction services. KCA also does not provide these services to our clients directly.

KCI is also a holding company which controls and supports subsidiaries which provide construction management services and seconded professional services. Details of services provided by KCI subsidiaries are explained below.

During the Reporting Period, KA employed 7 people and KCI employed 3 people. KCA did not have any employees. All 10 roles were based in Victoria.

Approximately, 350 people were employed by the foreign subsidiaries of KCI, located across the various jurisdictions in which those subsidiaries are domiciled. The majority of these employees are located in China or the United States of America. Roles performed by employees include: construction managers, project managers, production managers, designers, secondees to clients, office staff and factory staff.

The operations of the other entities covered by this statement are as follows:

**Kajima Development Australia Pty Ltd** – holding company for the real estate development business in Australia.

**Icon Developments Australia Pty Ltd** – provides development and capital services for property projects. The entity's development services include feasibility due diligence, funding, concept and construction, and its capital services include providing funding solutions. The entity operates across the commercial, industrial, residential and mixed-use real estate sectors. The entity operates in Australia and New Zealand, with an office in Victoria.

#### ***KCI subsidiaries***

**Cockram Projects (Shanghai) Construction and Engineering Co Ltd** – is a multi-disciplinary engineering & construction company in China, providing professional project life cycle engineering & construction management services, including: Project Management; Design and Design Management; Cost Engineering and Procurement; Construction Management; Commissioning and Validation and overall General Contracting services.

Its professional EPCM services include: Pharmaceutical, Biological, Industrial and Chemical, Healthcare / R&D, High-tech Industrial Manufacturing Plants, Theme Park projects.

Approximately 100 people were employed in the company, and 30% of them are working at offices in China and the rest of them are working at project sites to provide the services above to its clients.

**Cockram Construction Inc. (USA based)** – provides secondment services mainly to pharmaceutical companies in the USA and implements KCI's services in the USA. Approximately 20 people were employed by the company, with approximately 2 of them are working at Cockram Construction Inc.'s offices. The rest are seconded to its clients.

**Scenario Cockram Limited (SCL Gr)** and its subsidiaries (refer to structure diagram above) – delivers comprehensive contracting and construction management services for guest experience-focused market sectors including Theme Parks, Location Based Entertainment, Branded Environments, Resorts, Zoos & Aquariums, and Cultural Experiences. Specifically, they provide the following services:

- program management (feasibility/constructability studies, estimating and ROM studies, bidding and administration, construction documents and 4D scheduling);
- technical design and engineering (pre-visualisation and virtual reality design, prototyping and mock-up, technical integration, BIM coordination and management, structural engineering design and fabrication drawings); and
- turnkey construction management (facility construction, fit-out construction and FF&E, speciality construction and theming, MEP, AV and special effects, in-field art direction, installation supervision, and installation and commissioning).

SCL Gr has eight main locations of operations. It operates in USA as a show contractor (production facilities in Los Angeles and Orlando), and in Asia as a show contractor (production facilities in Zhuhai, Bangkok and Hong Kong, design and service centre in Manila, and sites also in Japan and Macau). Approximately 350 people were employed in SCL Gr. Of these 350 employees:

- approximately 220 people were employed in the USA and most of them are working at plants to produce showsets or rockworks;

- approximately 10 people were employed in Hong Kong working at SCL Gr headquarters, 60 people were employed in Manila performing administration, IT, and design work roles, 40 were employed in China (Zhuhai) and 10 were employed in Thailand for work at plants to produce showsets or rockworks. A small number of people were also employed in Macau and Japan at project sites to support our production to install there.

### 2.3 **Supply chain**

As the Reporting Entities are holding companies, our supply chain is limited to that of professional services such as accountants and lawyers, office leases, utilities, facilities maintenance, catering, telecommunications and IT hardware. Our suppliers are predominantly located within Australia although some suppliers may procure material items from overseas locations.

The supply chain of KCI's subsidiaries (which are not reporting entities) are diversified by virtue of their operations in the construction sector in overseas locations. Procurement categories of KCI's subsidiaries includes construction (production) materials, plant and equipment, various tradespeople and labourers, in addition to the categories described for the Reporting Entities.

## **3 Modern slavery risks**

The risk assessment below has been conducted with reference to industry-based, product-specific and geographic modern slavery risks. The Reporting Entities are committed to improving their oversight of modern slavery risks in future reporting periods and developing their policies and procedures for assessing modern slavery risks in a manner more specific to its engagement with business partners and suppliers.

### 3.1 **Modern slavery risks in the operations and supply chain of the Reporting Entities**

The operations of the Reporting Entities are based in Victoria and the 10 people employed by the Reporting Entities perform highly-skilled office-based roles. Having regard to the worker profile and Australia's robust industrial relations laws, we consider that the overall risk of modern slavery in our operations to be very low. Likewise, the risk of modern slavery in the first tier of our supply chain is considered low as we procure goods and services predominately from Australian based businesses. Nevertheless, there are inherent risks in the later tiers of our supply chain in goods such as IT and telecommunications equipment and services such as facilities maintenance.

### 3.2 **Modern slavery risks in the operations and supply chain of KCI's foreign subsidiaries**

Based on information published by the Global Slavery Index, there are increased risks of modern slavery in countries such as China, Macau, the Philippines and Thailand. The employment of workers in KCI's foreign subsidiaries in those higher risk locations may present some risks. However, the Reporting Entities consider that the risks are mitigated by virtue of the proportion of skilled workers in the countries associated with increased risks and KCI's compliance with all industrial relations laws and regulations in the countries in which it operates.

An area of increased exposure to modern slavery risk is in the supply chain of KCI's foreign subsidiaries operating in the construction sector and subcontractors involved in showset/rockwork production.

Labour hire, materials and construction services are the main areas of exposure to modern slavery risk in respect of the supply chain of KCI's subsidiaries.

Potential modern slavery risks in the construction sector may emerge from:

- outsourcing;
- contract terms with competitive margins and pressure on delivery times;
- some reliance on a migrant workforce with limited English competency and temporary visa arrangements;
- limited visibility over supply chains and sub-contracting arrangements;
- use of labour hire providers;

- materials, uniforms and personal protective equipment that are sourced from countries with higher modern slavery risks; and
- operations in regions where there are lower labour standards and protections for workers.

### 3.3 **Modern slavery risks in the operations and supply chain of IDA**

IDA's operations are limited to residential and commercial property development in Australia. We consider that the risk of modern slavery in the operations of IDA is low for the following reasons:

- IDA's 11 employees are all located in Australia;
- IDA complies with all industrial relations laws and regulations; and
- IDA employees are paid above award wages.

Labour hire, materials and construction services are the main areas of exposure to modern slavery risks in respect of IDA's supply chain.

## 4 **Actions taken to assess and address modern slavery risks**

Due to the nature of KA, KCA and KCI as holding companies, Kajima has prioritised assessing and addressing the risks of modern slavery in KIH's operations and supply chains, which generates most of the revenue within KA's corporate structure. The actions undertaken by KIH during the Reporting Period were comprehensive and responsive to modern slavery risks. KIH's statement describes these actions in more detail.

Each Reporting Entity has a whistleblowing system available to employees of these entities. During the Reporting Period, no incidences or practices of modern slavery were identified in the operations and supply chain of the Reporting Entities or reported through these whistleblowing systems. In the event that our business 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 future recurrence. Specific remediation activities would be determined on a case-by-case basis to ensure the most appropriate and effective actions are undertaken.

Kajima has a Group Human Rights Policy, Procurement and Outsourcing Policy, Code of Conduct and Conduct Guidelines for its Business Partners. The Reporting Entities and their wholly owned or controlled entities are required to comply with these policies. During the next three reporting periods, Kajima will be assessing the scope and implementation of these policies to ensure that there is consistent action being taken to address modern slavery risks across its group entities. The Reporting Entities will also be reviewing how to improve their due diligence and remediation measures, including communicating their policies and procedures to their international subsidiaries.

## 5 **Assessing the effectiveness of our actions**

Our modern slavery reporting is overseen by the Board of KA. This includes reviewing the actions taken by KIH, which has been the focus of our group's modern slavery program.

Over the next three reporting periods, the Reporting Entities will seek to continue to review our internal processes to assess and address modern slavery risk. This will include commitments to:

- implement group-wide training on modern slavery and human rights risks;
- considering the development and distribution of supplier questionnaires; and
- introducing modern slavery clauses into supplier contracts.

## 6 Consultation and approval

In preparing this statement, KA gave modern slavery briefings to the board representatives of all owned/controlled entities in KA Group. KA contacted the board representatives of these entities and obtained information in respect of the activities of these entities assessing and addressing modern slavery risks.

Accordingly, this statement was developed in consultation with the Reporting Entities and their owned or controlled entities.

The Board of KA approved this statement on behalf of the Reporting Entities on 26 June 2023.

  
Tatsuru Isano  
Managing Director  
Kajima Australia Pty Ltd  
Signature  
Date 27 June 2023

MSA Section	Reporting Criterion	Section of Statement
16(1)(a)	Identify the reporting entity	1
16(1)(b)	Describe the structure, operations and supply chains of the reporting entity	2
16(1)(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	3
16(1)(d)	Describe the actions taken by the reporting entity and any entities the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	4
16(1)(e)	Describe how the reporting entity assesses the effectiveness of such actions	5
16(1)(f)	Describe the process of consultation with any entities that the reporting entity owns or controls, and in the case of a reporting entity covered by a statement under section 14 – the entity giving the statement	6
16(1)(g)	Include any other information that the reporting entity considers relevant	N/A