

MODERN SLAVERY STATEMENT 2023 Rev 4

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 2023 (**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, submit their own joint modern slavery statement. 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 \$1.7 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, including by providing IT, HR and finance support functions. KIH's registered office is C/- Pitcher Partners Advisors Pty Ltd, Level 13, 664 Collins Street Docklands VIC 3008

Our operations include the unincorporated Joint Venture with Njama Resources Enterprises in Western Australia (Yulu) and various unincorporated Joint Ventures with Reeves International (and CCB Envico) on selected Australian and Pacific projects. These Joint Ventures have been included in this statement and the risk assessment provided below.

During the Reporting Period, Icon employed approximately 805 staff of which 21 were casuals, 754 were full time and 30 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 / cadet
- Project coordinators
- Design (design coordinator, design manager)
- Services (service coordinator, service manager)
- Planning
- Estimating
- New business
- Submissions coordination
- 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)
- Director
- Safety (safety coordinator, safety manager)
- Quality (quality coordinator, quality manager)

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:

	<p>Minicon delivers projects at small to medium project values across many sectors, including health and science, technology, education, commercial and high-end residential.</p> <p>Minicon shares financial, OHS & E, IT and innovation and IP resources with Icon and Kajima.</p>
	<p>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.</p> <p>As noted above, Barpa is also the 100% owner of the Kianga Group, a subcontract painting and coatings business operating Australia-wide.</p>

2.3 Supply chain

Our tier one supply chain continues to consist primarily 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 work is completed via the standard construction industry subcontracting model with all trade works provided via either subcontracting businesses (that provide all materials, labour, supervision and plant) or suppliers that provide materials for installation by those other subcontractors on the project.

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

During the Reporting Period, Icon introduced iPro modern slavery software into our procurement processes (explained in further detail in sections 3.1 and 4.4)¹.

The introduction of the software has enabled us to improve oversight of our first-tier suppliers and obtain a level of visibility of our second-tier suppliers. It has enabled us to further identify that that our suppliers operate, produce and source goods in the following sectors:

- Accommodation and food service activities
- Administration and support services
- Agriculture, forestry, and fishing
- Arts, entertainment and recreation
- Education
- Government administration, defence and social security
- Health and social work

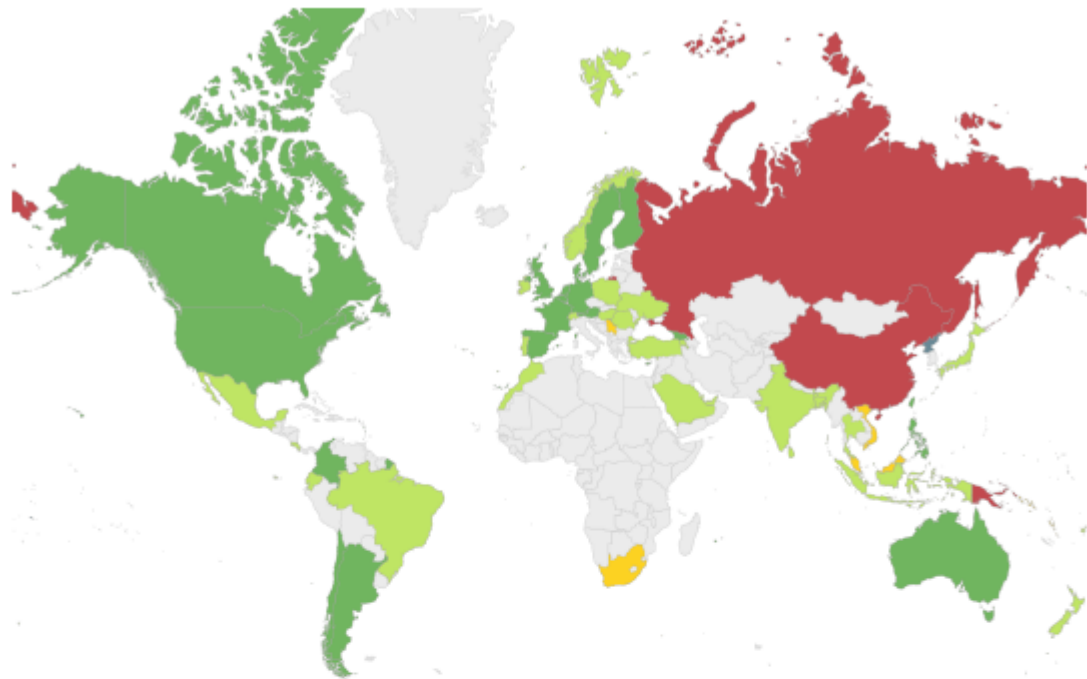
¹ In this statement, all data and graphics sourced from iPro are based on an iPro Insights Report dated 28 March 2024. A small number of suppliers were invited to register (11), and were removed from (51), the iPro software between the period of 31 December 2023 and 28 March 2024. Icon is satisfied that the Insights Report substantially reflects our first-tier supply chain during the Reporting Period.

- International organisations, diplomatic and consular services
- Maintenance and repair of motor vehicles
- Manufacturing
- Mining and quarrying
- Real estate
- Retail
- Transportation and storage
- Water supply, sewerage and waste management
- Wholesale

The iPro software has improved 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.

We have a small number of suppliers operating in China, Macau, Papua New Guinea and Russia 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 graphic on the following page is sourced from iPro and provides a snapshot of the countries where our first-tier suppliers have operations.



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 2WL

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.

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 2023 Reporting Period, Icon continued to use its own modern slavery risk matrix to assess our operational risk and, prior to implementing iPro, our supply chain risk. The risk matrix uses the Australian and New Zealand Standard Industrial Classifications (ANZIC) and assigns risk ratings for modern slavery to each industry division and subdivision. The risk matrix also assigns risk ratings to countries and product categories. For example, we are aware that ANZIC 30 – Building Construction is classified as high-risk for modern slavery, as are products such as bricks, sandstone, gravel, granite and various minerals.

Icon is satisfied that our identified risk of modern slavery arising are substantially the same as the 2022 reporting period. The risk matrix uses the Australian and New Zealand Standard Industrial Classifications (ANZIC) and assigns risk rating for modern slavery to each industry and subdivision.

In December 2023, we engaged iPro to assess the modern slavery risk of our 4222 suppliers using iPro's Modern Slavery Assessment Tool (**MSAT**). We intend to carry this process forward as an annual risk assessment of our supply chain.

The MSAT required participating suppliers to complete a self-assessment questionnaire online, which includes questions about the sectors and locations suppliers operate in, produce goods in and source goods from, as well as their existing modern slavery controls. After each supplier completed and submitted the questionnaire, their responses were processed within the iPro system to determine their modern slavery risk scores and associated risk category. As an additional due diligence step, we also requested suppliers to upload documentation to support their assessment responses.

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 is still present (remains) after accounting for modern slavery risk controls that have been implemented by the organisation. This is determined by asking suppliers about the policies, processes, and procedures in place to reduce modern slavery risks.. A supplier's Unmitigated Risk Score determined 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 risk still present 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

The majority of our direct employees are 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, we monitored the operational risks involved in our Pacific region projects in Fiji, the Solomon Islands and Vanuatu via engagement with those project teams. This includes local minimum age and minimum wage requirements. We are aware of in-country reports of ‘child-swapping’ which is essentially child trafficking. Human trafficking into Vanuatu is also a known risk due to the border being largely unpatrolled and illegal migrants having little to no rights.

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.

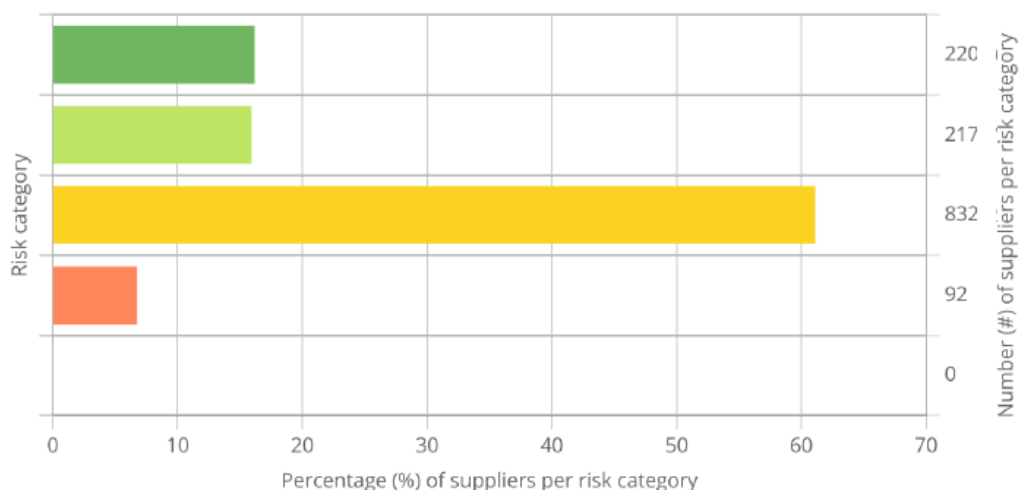
3.3 Modern slavery risk assessment of our supply chain

Using the iPro modern slavery assessment software, we found the majority (61%) of assessed suppliers were categorized as a ‘medium risk (partial risk control)’. 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 a small proportion (6.8%) of assessed suppliers were categorised as ‘high risk (inadequate risk control)’. 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.

No assessed suppliers were categorised as having ‘high risk (high levels of inherent risk)’, which indicates ‘very high’ levels of inherent modern slavery risk.

Supplier assessment results



Inherent risk of suppliers

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

- The majority (72.7%) 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 vast majority of these suppliers operating in the construction and manufacturing sectors.

- 36.1% 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 vast majority of these producing goods or supplying services in the construction and manufacturing sectors. For example, aluminum, gloves and toys in China, soccer balls in India and furniture in Vietnam, which are considered to have a high-risk of modern slavery.
- We now have improved visibility in respect of second-tier suppliers. 59% 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, soccer balls and stone from India, rubber gloves from Malaysia and furniture and textiles from Vietnam, which are considered to have a high-risk of modern slavery.
- Other high-risk sectors which our first tier suppliers operate in, produce goods in and source goods from include retail, wholesale and transportation and storage.

It is not clear from our inaugural iPro assessment 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. Given the iPro survey was launched in the last month of the reporting period, we intend to seek to commence reviewing its procurement records and otherwise engage with relevant suppliers to confirm and address these risks in the next reporting period.

The construction sector is at high-risk of 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 identified:

- 100% of assessed suppliers have some element of work to undertake to address modern slavery supply chain risk.
- 70% of assessed suppliers issue a policy explicitly ensuring wages meet applicable host country legal requirements.
- 60% of assessed suppliers issue a policy prohibiting all forms of discrimination.
- 56% of assessed suppliers issue a policy explicitly prohibiting all forms of forced labour and human trafficking.
- 48% of assessed suppliers issue a policy prohibiting charging recruitment fees.
- 42% of assessed suppliers issue a policy prohibiting the procurement of commercial sex acts during the length of a contract.

- 15% of assessed suppliers conduct a formal vulnerability assessment of their works to slavery and human trafficking.

In the next reporting period, we intend to commence engaging with our high risk suppliers identified by iPro to encourage and support the improvement of their risk control procedures and processes and will report on these actions in our next modern slavery statement, given the iPro system was implemented in the last month of this reporting period.

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

<p>Inherent risk score</p> <p>28.9 out of 100</p>	<p>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).</p>
<p>Unmitigated risk score</p> <p>35.7 out of 100</p>	<p>The level of risk still present after accounting for modern slavery risk controls that have been implemented in your supply chain.</p>

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

We did not identify any incidences or practices of modern slavery during the 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 and 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.

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 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 at least 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 continued to develop its Human Rights Policy, Whistleblower Policy and Recruitment Policy. Icon has also continued to develop our internal training pack and revise our Code of Conduct.

As of the end of the Reporting Period, the review of our Modern Slavery Policy is yet to be completed. It will be finalised and implemented over the next reporting period.

We continued to monitor our project teams understanding of the modern slavery policies, procedures and systems in 2023 through our internal project Commercial Reviews.

4.4 Supplier onboarding and engagement

Prior to the implementation of the iPro modern slavery software in December 2023, our supplier onboarding process in our pilot projects required suppliers to complete a modern slavery questionnaire. This questionnaire required suppliers to identify:

- the locations of their operations and the manufacture/supply of their goods and services;
- the types of workers they engaged, specifically any migrant, displaced, itinerant, prison, conscripted, labour hire or workers under the age of 18;
- whether they provided any accommodation or require workers to pay recruitment fees; and
- whether they had conducted a human rights impact assessment, using the language of the United Nations Guiding Principles on Business and Human Rights 'caused, contributed or directly linked' framework.

Once suppliers had returned the modern slavery questionnaire, we assessed their responses against Icon's modern slavery risk action plan. The risk action plan contained guidance notes for our staff responsible for supplier and procurement relationships to assign each supplier a risk rating based on their responses to the questionnaire.

New suppliers for our construction projects continued to undergo an accreditation process, where they were assessed in various stages to ensure that they are financially viable, able to meet OWH&S requirements, and meet the commercial, policy and operating requirements set out by Icon.

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

Icon's suppliers continued to be 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.

In December 2023, as part of Icon's transition to using the iPro MSAT to assess supply chain risk, all our existing suppliers were requested to complete the iPro assessment process as described in section 3.1 above. By the end of the Reporting Period, approximately 100 of our suppliers had completed the assessment.

During the next reporting period, we will update our supplier onboarding and engagement process as follows:

- Hard copies of the supplier questionnaires, tender interviews and risk action plans will be replaced by the new iPro software.
- In relation to new suppliers on Icon's projects:
 - Prior to recommending the appointment of a supplier, the supplier must complete the iPro modern slavery risk assessment and three modern slavery risk mitigation actions must be agreed between the parties, using iPro's recommended risk mitigation action plans for the supplier as a guide, and added to the supplier's contractual scope of works;
 - During contract administration, Icon's project teams will monitor the supplier's progress on its risk mitigation actions;
 - To achieve practical completion or performance of its services, the supplier must have completed the risk mitigation actions.

Offshore Procurement Team

Continuing from our 2022 statement, Icon maintained engagement with our Offshore Procurement Team which is responsible for managing the sourcing of Joinery and Façade, typically from China. We understand from our previous risk assessments that this type of procurement presents product and geographically-based modern slavery risks. For this reason, we continued to raise awareness of 'modern slavery risks and how to comply with Icon's modern slavery obligations by checking in with the team to identify any new issues that might have arisen.

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

We also engaged with the Offshore Procurement Team to complete risk action plans, although these have since been superseded the iPro modern slavery risk assessment software. In future reporting periods, we are looking to use our offshore resources and the international mobility of the Australian-based Offshore Procurement Team to increase physical inspections of suppliers, including prescribed checklist items, to mitigate the risks identified in our updated risk assessment process.

4.5 Pilot projects

During the Reporting Period, Icon undertook a review of the pilot project program referred to in last year's statement. The pilot project program was designed to support the progressive implementation of Icon's modern slavery compliance tools and templates.

The review assessed the effectiveness of the pilot project by reference to the scale of implementation and uptake, whether incidents of modern slavery were being reported, and levels of awareness across employees, suppliers, contractors and other stakeholders. The review found the following.

- A broad level of support among pilot project teams for Icon's efforts in identifying and assessing modern slavery risk found that the program;
- Improved awareness and understanding of modern slavery risk among participating teams and suppliers.
- The paper-based assessment processes were considered cumbersome and it would be challenging scale them up for use across Icon's entire operations and projects;

- Project teams required further support and skill developments to enable them to lead discussions with suppliers and effectively gather the necessary data to inform the risk assessment;
- Inefficiencies and inconsistencies in information gathering and the assessment of data.

This feedback and assessment informed the decision to implement the iPro modern slavery software and pause the expansion of our pilot project program during the Reporting Period.

The iPro software has significantly improved our ability to collect data, map supply chains, and conduct risk assessments efficiently and consistently across our international operations.

The next phase of implementation will involve integrating the iPro software into our supplier onboarding and contract administration processes as described in section 4.4 above and commencing engagement with our high-risk existing suppliers with the objective of mitigating the risks identified using iPro's recommended risk mitigation action plans as a guide. These actions are outlined in further detail in section 5.2.

We note that our Vanuatu project raises specific modern slavery risks, and we continue to address these risks by conducting worker eligibility checks (including age and identity checks) as part of all project inductions. We recommend making a commitment to awareness-raising and engagement with project teams in Vanuatu to implement international labour standards.

4.6 Internal training

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

Our internal modern slavery audit and training programs will be progressively updated to align with the updated processes and software and relaunched in 2024 and Icon-wide training is intended to be an ongoing action item for subsequent reporting periods. This is discussed further in our updated commitments in section 5.2 below.

5 Assessing the effectiveness of our actions

During the Reporting Period, we began actioning the commitments in our 2022 statement to assess and address modern slavery risks in the operations and supply chain of pilot projects and the broader business. Given the implementation of iPro to embed risk assessment and mitigation processes across our entire supply chain, we paused the expansion of our manual pilot project risk assessment processes and our other commitments to ensure our risk mitigation actions are responsive to the rigorous iPro assessment and enable us to target priority areas of risk.

5.1 Assessing effectiveness

As outlined in section 4.5, we assessed the effectiveness of the pilot project program in 2023 which resulted in the decision to implement the iPro modern slavery software as a tool to assess and mitigate risks of modern slavery in our supply chain.

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 intend 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 also intend to establish reporting processes to commence using the individual scores assigned to each supplier to monitor the progress and effectiveness of actions taken by individual suppliers with a high modern slavery risk profile.

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

During the next reporting period, we will expand the promotion, implementation and effectiveness of our modern slavery compliance systems and processes across the business and assess our effectiveness by:

- Conducting another survey of our entire supply chain using the iPro MSAT commencing late 2024 and targeting a 40% response rate from the 33% rate achieved during the inaugural survey
- Completing the updating of all Icon Human Rights, Whistleblower, recruitment, Modern Slavery policies and related documentation such as our Code of Conduct
- Progressively implementing a revised supplier onboarding process embedded within our pre-procurement procedures and contract administration processes which utilizes iPro's assessment and risk-mitigation tools
- Relaunching our internal training program to deliver mandatory compliance training for all internal employees during 2024, with a target to deliver external training to all active on site suppliers by the end of the year linked to the supplier onsite onboarding procedures
- Updating our revised internal Commercial Review templates to revise our Modern Slavery audit requirements when sampling on site subcontractors and suppliers
- Seek to commence engagement 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.
- Review our progress in late 2024 / early 2025 using the iPro software data benchmarks to assess our progress and identify further mitigation actions for our next statement.
- Review and improve our processes and systems of reporting modern slavery risks to the board.

We will assess the effectiveness of our actions by tracking against these goals during 2024 and 2025 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 30th June 2024.



Evan Byrne
CEO/Managing Director
Kajima Icon Holdings
Date 30th June 2024

Reporting Criterion	Page
1 & 2. Identify the reporting entity and describe its structure, operations and supply chains	1
3. 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	6
4. Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	10
5. Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	13
6. Describe the process of consultation with any entities the reporting entity owns or controls	14