

Modern Slavery Statement

RAWSON GROUP PTY LIMITED ACN 000 382 329

PERIOD: 1 JAN 2025 - 31 DEC 2025



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Introduction

Pursuant to the requirements of the Modern Slavery Act 2018 (Cth) (the Act), this statement sets out the actions taken by Rawson Group Pty Limited ACN 000 382 329 (Rawson) and its wholly owned or controlled entities to address and minimise the risk of modern slavery in its business and supply chain.

This is Rawson's sixth Modern Slavery Statement and covers the calendar year to 31 December 2025.

The term modern slavery is used to cover a broad range of exploitative practices including but not limited to situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom, child exploitation, child labour and other slavery practices like human trafficking and deceptive recruitment. Modern slavery can manifest in supply chains through a variety of labour rights abuses.

Rawson opposes slavery in all of its forms. At Rawson we are committed to addressing the risk of modern slavery in our operations, supply chains and contractors and to adopting measures to prevent all types of modern slavery.



2 Reporting Entity & Organisational Structure

2.1 IDENTIFYING THE REPORTING ENTITY

Rawson Group is a residential construction and development company based in New South Wales (NSW) with operations in both NSW and the Australian Capital Territory (ACT).

Established in 1978, Rawson became part of the Daiwa House Industry Co Limited, Japan's largest homebuilder in 2018.

Rawson is committed to the design, sale and construction of residential homes and developments in NSW and the ACT.

Rawson Group Pty Limited is identified as a reporting entity pursuant to section 5 of the Modern Slavery Act 2018 (Cth).

Rawson's wholly owned or controlled entities for the reporting period are set out in Annexure A. In this Statement, a reference to 'Rawson' or 'Group' includes all entities listed in the Annexure, reflecting the Group's shared commitment to address modern slavery.

2.2 CORPORATE GOVERNANCE

Rawson is committed to robust corporate governance policies and practices to ensure the continued success and growth of Rawson and its subsidiaries. Rawson proactively reviews its governance practices to meet its obligations as a responsible corporate entity.

2.3 ORGANISATIONAL STRUCTURE

The Rawson Group Board is comprised of a majority of non-executive directors responsible for ensuring that the Group is managed in a manner that protects and enhances the interests of its stakeholders and takes into account the interests of customers, suppliers, contractors and the wider community.

The Board is responsible for overseeing Rawson's response to modern slavery risks and for the approval of this Modern Slavery Statement. Rawson's approach to modern slavery risk management is reviewed by the Audit & Risk Committee.

2.4 CONSULTATION WITH SUBSIDIARIES

The effective control and management of Rawson subsidiaries is held by the Rawson Group Board and Executive Committee and operated from a centralised Head Office. All subsidiaries are subject to the policies, procedures, standards and reviews as outlined in this statement.

3 Our Direct Workforce

Rawson has assessed the risk of modern slavery within its internal operations as very low. Rawson's employees are skilled professionals operating exclusively in Australia. Based on the nature of its operations, workforce profile and geographic location, Rawson considers there to be a very low risk of exposure within its direct operations to child labour, forced labour, exploitative labour practices or other forms of modern slavery.

Rawson employs around 170 people who all have individual employment contracts that confer pay and entitlements which are at minimum in line with any relevant awards and minimum wage requirements.

All employees have access to the CEO and any issues or concerns can also be raised to the Chief Legal & People Officer or through the Whistleblower Policy.

Rawson has a hybrid working from home and office model, and is committed to ensuring a safe workspace in all locations.

Rawson's commitment to the ethical conduct of business and respect for human rights in the workplace is embedded in our policies and procedures, including:

- a) Code of Conduct;
- b) Bullying, Harassment and Discrimination Policy;
- c) Whistleblower Policy;
- d) Anti-Bribery Policy;
- e) Gift Receiving and Gift Giving Policy;
- f) Work Health and Safety (WHS) Policy;
- g) Flexible Work Policy; and
- h) Internal Promotion, Recruitment and Selection Policy.

All policies are readily available for view by all employees on Rawson's intranet. Staff training is also provided in the areas of Anti-Bribery and Corruption as well as Anti-Bullying and Harassment. Together with our values, these policies and training initiatives reinforce Rawson's expectations of its employees and culture, and Rawson's commitment to supporting employees to feel safe, valued and included.







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Our Supply Chain

Rawson has a diverse range of suppliers, including Government Authorities, building contractors (civil and built form), design consultants, engineers, surveyors, certifiers, information technology and security.

Our supplier and subcontractor selection process includes reviews to ensure compliance with Government mandated standards and compliance with health, safety and environmental standards.

When selecting suppliers and subcontractors, Rawson takes into consideration the geographical location of suppliers, original supply location and the type of goods and services, as well as their reputation.

Our direct suppliers have their own complex and diverse supply chains that can extend beyond Australian borders. This includes having many suppliers of materials or services who in turn rely on many more suppliers, both domestic and international. We are committed to working with our suppliers and the extended supply chain to identify and address modern slavery.

Our development spend is predominantly procured from Australian suppliers and consultants.

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Supplier Risk of Modern Slavery Practices

5.1 RISK ASSESSMENT

Assessment of Suppliers

Rawson relies on third party suppliers in its supply chain to provide the products and services related to residential construction.

Rawson has assessed the international supply risks, sector risks and business partnership risks within its supply chain as low due to the risk control measures outlined below.

5.2 RISK CONTROL MEASURES

Due Diligence

Where we have identified any chance for elevated risk in our supply chains, appropriate due diligence has been undertaken to satisfy ourselves that the parties concerned have in place ethical employment practices that comply with all relevant legislation including, where applicable, the making of a Modern Slavery Statement. Where suppliers have not published a Modern Slavery Statement, they are required to confirm that they have in place such ethical employment practices and that they, in turn, require their suppliers to have the same.

Annual Reporting by Suppliers

Annual reporting is required from our suppliers with updated information and initiatives surrounding Modern Slavery in their business and supply chain network, either through review of suppliers' Modern Slavery Statements and/or progress against identified risks.

Engagement with Suppliers

Modern slavery risk is addressed as part of the onboarding process for new suppliers. Quarterly business review meetings are held with key suppliers where modern slavery is addressed as a standing agenda item. Factory and business outreach meetings also reinforce supplier awareness of Rawson's expectations in this regard.

Supplier Code of Conduct

Rawson has a Supplier Code of Conduct and Practice which addresses modern slavery risks. The Code is included in supplier onboarding information, purchase order terms and conditions and via Rawson's website.

5.3 MANAGEMENT OF IDENTIFIED RISK

Although Rawson has assessed the overall risk of modern slavery within its supply chain as low, employees remain vigilant in identifying and escalating any potential indicators of modern slavery or labour law non-compliance amongst suppliers. Particular attention is given to labour practices within the construction sector, including ensuring that third-party contractors operate in compliance with applicable workplace laws and standards.

During CY25, concerns were raised by the Rawson Procurement team regarding certain behaviours in connection with works at a residential construction site. These concerns were escalated to the executive team and an investigation was undertaken, including engagement with the supplier to assess the allegations and review their practices.

While the investigation did not identify sufficient evidence to substantiate the concerns, the process highlighted concerns regarding the supplier's compliance with our Supplier Code of Conduct and a decision was made to terminate the relationship with the supplier. This action reflects our commitment to upholding ethical business practices and ensuring that all suppliers meet our standards for responsible conduct.

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Operational Risk Management

6.1 AUDIT & RISK COMMITTEE AND RISK MANAGEMENT FRAMEWORK

Rawson Group's Audit and Risk Committee is responsible for overseeing the Group's Risk Management Framework. This formal framework provides systems to map, identify and control risks, as well as evaluate the effectiveness of risk mitigations. It helps ensure that any risks of modern slavery are quickly identified and addressed.

6.2 MODERN SLAVERY POLICY

Rawson adopted a Modern Slavery Policy in CY24 which is available to all staff via the intranet. The policy sets out the modern slavery prevention initiatives undertaken within Rawson's operations and supply chain. It also outlines reporting requirements for breaches of modern slavery law.

6.3 STAFF TRAINING

Rawson Group is committed to ensuring that key members of staff understand and implement Australia's modern slavery laws. In CY25 annual modern slavery awareness training was undertaken by Rawson Group's Managing Director and CEO, senior Executives, Construction Managers and members of the Procurement team. The training was also provided in Japanese to Rawson's Board Directors from parent entities Daiwa House Industry, Co. and Daiwa House Australia.

6.4 EFFECTIVENESS OF RISK MANAGEMENT

We assessed effectiveness in CY25 by tracking our actions and outcomes which included: updating or adding to our governance documents; building on our internal knowledge and understanding of modern slavery through annual awareness training; ongoing engagement with our key suppliers and contractors to identify, analyse, assess and, if required, report and/or remediate incidences of modern slavery in our supply chains.

As noted in section 5.3, one potential modern slavery risk indicator was identified within Rawson's supply chain during the reporting period. The matter was promptly identified and escalated by staff, demonstrating the effectiveness of employee awareness and vigilance in relation to modern slavery risks. Following an investigation, Rawson took the step to terminate the relationship with the supplier.



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Response to Modern Slavery

7.1 WHERE WE ARE TODAY

A range of actions have been undertaken as part of Rawson’s commitment to continuous improvement. In CY25 we have:

- (a) Continued to follow a Risk Management Framework which provides a clear and detailed internal process to identify and address risks, including the risk of modern slavery in our supply chain;
- (b) Engaged with key suppliers and contractors to determine and verify salient modern slavery risks. This included requiring annual reporting from suppliers to provide updated information and initiatives surrounding Modern Slavery in their business;
- (c) Identified, escalated and acted on a potential modern slavery risk within Rawson’s supply chain, demonstrating the effectiveness of employee awareness and vigilance in relation to modern slavery risks;
- (d) Continued our formalised Quarterly Business Reviews with suppliers to understand supply chain challenges and address Modern Slavery as a standing agenda item;
- (e) Implemented a Modern Slavery Policy which is available to all staff via the intranet;
- (f) Implemented a Supplier Code of Conduct addressing modern slavery which is provided to suppliers via our purchase order terms and conditions;
- (g) Provided training in Modern Slavery Awareness to all relevant personnel; and
- (h) Undertaken an ongoing review of our workplace practices and conditions, relevant awards and pay structures.

7.2 PRIORITIES FOR 2026

Priorities for CY26 include:

- (a) **Ongoing supplier management:** Rawson will continue to address Modern Slavery in onboarding new suppliers, annual supplier reporting and quarterly business reviews;
- (b) **Supplier Code of Conduct:** We will continue to provide the Code to suppliers. The Code explains Rawson’s expectations of suppliers in terms of identifying and addressing modern slavery risks;
- (c) **Prevention of Modern Slavery Policy:** We will ensure that staff are aware of their reporting obligations under our Modern Slavery Policy. Rawson’s Audit & Risk Committee will continue to monitor compliance with the policy as part of its implementation of the risk management framework; and
- (d) **Staff training:** Modern Slavery Awareness training will again be provided to Board Directors and all key management and procurement staff in 2026. It will be offered in both English and Japanese.



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Approval

This Modern Slavery Statement covers 1 January 2025 to 31 December 2025 and has been approved by the Rawson Board of Directors by Circular Resolution on 22 June 2026.

Signed by:



Gary Flowers
Chairman



Lyndall Stewart
Company Secretary

Annexure A

Reporting Entity & Group Structure

Reporting Entity: Rawson Group Pty Limited

ACN 000 382 329 ABN 64 000 382 329

Wholly Owned or Controlled Entities					
Entity Name			Entity Name		
Rawson Homes Pty Limited			RC Resi No 12 Pty Limited		
Rawson Communities Pty Limited			RC Resi No 14 Pty Limited		
Rawson Legal Pty Limited			RC Resi No 14 Trust		
Rawson Real Estate Sales Pty Ltd			RC Resi No 15 Pty Limited		
Home & Land Centre Pty Limited			RC Resi No 15 Trust		
Thrive Homes Pty Limited			RC Resi No 16 Pty Limited		
Fern Bay No 1 Pty Limited			RC Resi No 16 Trust		
Fern Bay No 1 Trust			RC Resi No 17 Pty Limited		
Aurora (Alex Ave) Pty Limited			RC Resi No 17 Trust		
The Aurora Unit Trust			RC Resi No 18 Pty Limited		
Schenectady Pty Limited			RC Resi No 18 Trust		
Schenectady Trust			RC Resi No 19 Pty Limited		
Fort Meyers Pty Limited			RC Resi No 19 Trust		
Fort Meyers Trust			RC Resi No 20 Pty Limited		
Port Huron Pty Limited			RC Resi No 20 Trust		
Port Huron Trust			RC Resi No 21 Pty Limited		
Mint Loans Pty Limited			RC Resi No 21 Trust		
Mint Loans Trust			RC Resi No 22 Pty Limited		
RC Resi No 1 Trust			RC Resi No 22 Trust		
RC Resi No 2 Pty Limited			RC Resi No 23 Pty Limited		
RC Resi No 2 Trust			RC Resi No 23 Trust		
RC Resi No 3 Pty Limited			RC Resi No 24 Pty Limited		
RC Resi No 3 Trust			RC Resi No 24 Trust		
RC Resi No 4 Pty Limited			RC Resi No 25 Pty Limited		
RC Resi No 5 Pty Limited			RC Resi No 25 Trust		
RC Resi No 6 Pty Limited			RC Resi No 26 Pty Limited		
RC Resi No 7 Pty Limited			RC Resi No 26 Trust		
RC Resi No 7 Trust			RC Resi No 27 Pty Limited		
RC Resi No 8 Pty Limited			RC Resi No 27 Trust		
RC Resi No 8 Trust			RC Resi No 28 Pty Limited		
RC Resi No 9 Pty Limited			RC Resi No 28 Trust		
RC Resi No 9 Trust			RC Resi No 29 Pty Limited		
RC Resi No 10 Pty Limited			RC Resi No 29 Trust		
RC Resi No 10 Trust			RC Resi No 30 Pty Limited		
RC Resi No 11 Pty Limited			RC Resi No 30 Trust		
RC Resi No 11 Trust					



Rawson Group Pty Ltd.

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