

# Henley Properties Group

Modern Slavery Statement  
2023

Henley 



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# About this Statement

This Modern Slavery Statement is made by Henley Arch Pty. Ltd. (ABN 15 007 316 930) as trustee for the Henley Arch Unit Trust (ABN 61 415 474 786), on behalf of ourselves and the reporting entities detailed in Table 1.

Throughout this statement, “Henley” is used to describe both the Henley Arch Unit Trust, and the subsidiaries outlined in our company structure in Table 1.

The statement was prepared and submitted in accordance with the Modern Slavery Act 2018 (Cth) and relates to the calendar year ending 31 December 2023.



# Introduction

We recognise that modern slavery is a growing and intricate challenge that can only be addressed through collaborative efforts and continuous improvement within our trusted industry and supply partnerships. We take our role in this effort seriously and are committed to identifying and understanding the impacts that our operations and supply chain have on people and the planet.

This statement highlights the measures we've taken to create processes, policies and standards that reduce the risk of modern slavery within our business, alongside our future objectives and goals.

## Mandatory reporting criteria in the Modern Slavery Act

This table provides a reference for the Act's mandatory reporting criteria outlined in this statement.

Modern Slavery Act 2018 (Cth) Criteria	Page Reference
Identify the reporting entity	2
Describe the structure, operations and supply chains of the reporting entity	4-8
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	9
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	10
Describe how the reporting entity assesses the effectiveness of such actions;	10
Describe the process of consultation with any entities that the reporting entity owns or controls	11
Details of approval by the principal governing body of the reporting entity	12

# About us

## Our History

Our business was founded in 1989 by three friends in Victoria with a vision to make home ownership more affordable for Australian families.

Over the next 20 years, we expanded our business to include local offices in Sydney, Brisbane and Adelaide and in 2009, entered a partnership with Sumitomo Forestry Australia Pty Ltd. - a wholly owned subsidiary of Sumitomo Forestry Co. of Tokyo Japan.

We are humbled to report that almost 60,000 families now call a Henley, Plantation or Edgewater home, their home.

Sumitomo Forestry Group was originally founded in 1691, and now manage a vertically and horizontally integrated, diversified and global business across the value chain of wood - ranging from upstream forestry to downstream home-building and environmental businesses. Sumitomo are an advocate for human rights, with their values based on Sumitomo's Business Spirit, which places importance on fairness and integrity for the good of society. They are a formal signatory to the United Nations Global Compact, whose principles are based on globally established agreements including the Universal Declaration of Human Rights, and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

With a shared commitment to these values, we take pride in drawing inspiration from Sumitomo's management principles and their aim to be a global organisation that contributes broadly to society and places importance on respect for individuals.



## Our Vision

To deliver 10,000+ homes between 2023 to 2028, by being the most trusted builder of homes and communities in Australia.



## Why we do it

To improve lives by creating better, happier and healthier homes for families.



## How we do it

We operate with integrity and leave a positive, lasting impression on our team, trades, suppliers, customers and the environment.



## What we do

We build the best quality homes at the best value with the best customer experience – quickly, safely and with certainty.



## Our Operation & Structure

We are leaders in new home design and innovation, with a focus on sustainable business and building practices. We make a difference by giving back to make our community a better place.

We specialise in:

- The design and construction of new and completed homes
- Fixed price house and land packages
- Knockdown and rebuild solutions
- Developing new land communities
- Modular town home solutions

We proudly employ over 600 team members and partner with 1,500 suppliers and contractors in the states in which we operate.

Our board is made up of founding directors Peter Hayes (on behalf of the Hayes Family Trust) and Robert Bowen (on behalf of the Bowen Family Trust), alongside representatives from Sumitomo Forestry Australia. An overview of our corporate ownership structure is outlined in Table 1.





**Table 1. Company Structure at 31 December 2023**



## Our Supply Chains

Our supply chains cover various products and services including:

- The acquisition and development of land
- The procurement of building and construction materials
- The engagement of suppliers and sub-contractors
- Professional services sourced locally and internationally

The responsibility for procuring our building materials is centrally managed. We focus on partnering with Australian suppliers and acknowledge that some may source their raw materials or labour overseas. Our ongoing goal is to deepen the knowledge and understanding of these supply chains where there may be greater risks of modern slavery.



# Risk Identification

## Direct Operations

Our direct operations present a low risk of modern slavery concerns. The Australian employment conditions are regulated by the Fair Work Act, and we regularly undertake internal and external audits to ensure our pay and work conditions remain compliant.

## Supply Chain

We are aware of the heightened risk of modern slavery and through collaboration, partnership, and transparency, we aim to protect human rights throughout the supply chain.

We engage international contractors to provide professional services such as drafting and design, estimating, accounting and IT. During the reporting period, these suppliers included businesses located in China, Philippines, Vietnam, Thailand, Sri Lanka and the United States.

During the procurement process for both building materials and professional services, due diligence is undertaken to assess modern slavery risks, and contractual terms are included in our agreements, to:

- Prohibit modern slavery practices.
- Require suppliers to embed practices that avoid the risk of modern slavery
- Require the disclosure and notification of any breaches or investigations
- Require Modern Slavery Statements be provided to us on an annual basis

# Risk Management

We are committed to addressing and managing the risks within our direct control. We recognise that this commitment is ongoing, requiring continuous monitoring and review.

Our actions during the reporting period include:

- Reviewing our Modern Slavery Policy to ensure it communicates our stance and empowers our team to disclose concerns or suggestions.
- An annual professional development day for all team members, to renew understanding of compliance matters including modern slavery and human rights.
- Modern slavery as an agenda item at Executive Team Meetings
- Ensuring modern slavery clauses are embedded in all new and renewed supplier and sub-contractor agreements, stating they must assess their manufacturing supply chain/s to ensure compliance with all Anti-Slavery Laws and provide training and education to their officers and workers.
- Practical training provided to Henley's Officers, Executive Team, Managers and Team Leaders on modern slavery compliance and practices.
- Providing training for new employees on the risks and impacts of modern slavery.

## Planned Actions

- Update Whistleblower Protection Policy to include specific reference to the disclosure of modern slavery concerns
- Distribute Sumitomo Forestry Group's Supply Chain Policy & Human Rights Policy and provide training to Henley's Officers, Executive Team, Managers and Team Leaders
- Raise awareness of the different types of modern slavery among suppliers through regular dialogue and clear guidelines and policies;
- Include information on modern slavery in our employee communication

## Effectiveness of Actions

We evaluate the effectiveness of our actions during regular policy reviews and annually when preparing our Modern Slavery Statement. We are committed to ethical practices and ensuring that our actions minimise modern slavery risks and recognise that our review and assessment process of these actions will be an ongoing and evolving process that we are committed to building upon.



# Group Consultation Process

We have prepared this statement in consultation with those responsible for Legal Counsel, Procurement, Health, Safety and Compliance and Human Resources.

Our Executive team is responsible for achieving action plans and implementing initiatives impacting their specific suppliers.

They are actively involved in the activities and outcomes detailed in this Statement, including all efforts to eliminate modern slavery in our supply chain.

All companies under our ownership (as outlined in Table 1) are overseen by the same Executive team and business policies.



# Our Commitment

We are committed to ensuring ethical business practices and do not contribute to or profit from the exploitation of workers, locally or internationally. We require transparency in our supply chain to prevent the mistreatment of human rights and are proud to be part of the Sumitomo Forestry Group and our shared philosophy of fairness and integrity.

## Approval

This statement was approved by the board of Henley Arch Pty Ltd on 27 June 2024.



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Riichi Shimizu  
Director



THE HOLLIS  
GIFFORD HOLLIS  
RAY MALIN

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