

Modern Slavery Statement FY2024

April 2024 – March 2025

Nishimatsu Construction Co., Ltd.

Trust. It's what we build.



NISHIMATSU

1. The Reporting Entity

Nishimatsu Construction Co., Ltd. (hereinafter, the “Company”, “Nishimatsu” and “We”) is a company incorporated in Japan and registered as a foreign company under the Corporations Act 2001 on 17th December 2021 (ABN 86 655 449 808).

2. The structure, operations, and supply chains

2.1 The Company Structure and operations

Nishimatsu is one of the leading general contractors in Japan and headquartered in Tokyo with regional headquarters and branch offices throughout Japan. The Company operates through five main divisions: Civil Construction; Building Construction; Real Estate, Energy & Environmental; and International.

The Company primarily conducts construction projects within Japan, but we also undertake construction projects in Singapore, Hong Kong, Malaysia, Thailand, Vietnam, Bangladesh, and the Philippines. Furthermore, our real estate development business and infrastructure investment extends beyond Japan to include the United States, Australia, Singapore, Thailand, Taiwan, and Vietnam.

Currently, the Company employs approximately 2,705 professional and technical staff domestically and about 360 overseas including one staff in Australia.

The Company has the following major subsidiaries.

Nishimatsu-Jisho Co., Ltd. (Minato-ku, Tokyo)
Nishimatsu Asset Management Co., Ltd. (Minato-ku, Tokyo)
Thai Nishimatsu Construction Co., Ltd. (Thailand)
Nishimatsu Vietnam Co., Ltd. (Vietnam)
Nishimatsu Real Estate & Development Asia Pte. Ltd. (Singapore)
Bangkok Sathorn Hotel Management Co., Ltd. (Thailand)

2.2 Operation in Australia

The Company has been actively exploring potential investments in Australia, focusing on renewable energy project development, including construction and equity participation, as well as real estate ventures.

In November 2023, through our subsidiary, Nishimatsu Real Estate & Development (Asia) Pte. Ltd. incorporated in Singapore, the Company has invested in a real estate fund that was co-founded and is currently managed in partnership with an Australian real estate management firm. The fund's assets are centred around a large-scale mixed-use complex in Sydney.

Following that, the company acquired a stake in April 2024 in a company that is an investor in a special purpose vehicle (SPC) for a PPP project currently being undertaken in Queensland, thus becoming indirectly involved in the project. SPC for the PPP project has been reporting its Modern Slavery Statement annually since 2021.

The Company did not undertake any construction projects in Australia during the fiscal year 2024.

2.3 Overview of the Supply Chain

The Company's supply chain is extensive and intricate, given the nature of the construction industry. It involves a vast network of suppliers, subcontractors, and other partners who provide materials,

equipment, and services necessary to complete construction projects. The Company places a strong emphasis on building and maintaining robust relationships with its supply chain partners, aiming for a collaborative approach to ensure the timely delivery of high-quality projects.

The Company has established supply chains in various countries, primarily sourcing the necessary materials, equipment, and services locally. However, if materials cannot be procured domestically, they are sourced from overseas.

The Company recognises it is important to work together with their business partners throughout the supply chain under a partnership for the Company to continue to conduct sound business activities. Therefore, the Company has established a "Procurement Policy" based on the "Corporate Philosophy" and "Code of Conduct" and is working to promote procurement activities that take into account Corporate Social Responsibility. The Procurement Policy consists of 9 articles. Among them, Article 1 declares that the Company will comply with laws and social norms both domestically and internationally, and Article 3 declares that the Company will respect personality and human rights and strive to ensure appropriate working conditions.

In addition, the Company has issued "Declaration of Partnership building" to the suppliers on 29th March 2024 that declares its commitment to building sustainable partnerships by fostering cooperation and coexistence with our supply chain partners and other value-creating businesses.

Moreover, the Company established the Nishimatsu Construction Cooperative (commonly known as N-Net) in 2011 with the aim of promoting mutual prosperity and solidarity among its member companies. Through collaboration with member companies, N-Net works to enhance technical capabilities, reduce costs, exchange information, and provide compliance training, ultimately contributing to the growth and performance of the companies involved. As of 31st March 2025, the membership of N-Net has grown to 1,023 companies.

3. The risks of modern slavery practices in the operations and supply chains

The Australian Modern Slavery Act 2018 (the Act) defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. The worst forms of child labour means situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

Generally, the construction industry is widely recognised as one of the sectors with a high risk of modern slavery. This can be attributed to several factors:

- **Complex Supply Chains:** Construction projects typically involve intricate supply chains with numerous layers of subcontractors, making it challenging to trace the origin of materials and labour.
- **Multi-layered Contracting Structures:** The common practice of primary and secondary contracting can obscure the employment relationships and create opportunities for exploitation.
- **Dependence on Foreign Workers:** The construction industry often relies heavily on foreign workers, who may be more vulnerable to exploitation due to language barriers, precarious immigration status, and limited access to legal protections.
- **Labour-Intensive Nature:** The labour-intensive nature of construction work can create pressure to cut costs, potentially leading to the exploitation of workers.

Nishimatsu operates construction and real estate businesses in Japan, Asia, Australia, and the

United States, and we have identified that there are varying risks of modern slavery in construction businesses in Japan and Asia (the Company did not undertake any construction projects in Australia and the United States during the fiscal year 2024).

Japan

- **Migrant Workers:** Japan has been relying on migrant workers in construction, who are vulnerable to exploitation due to:
 - Debt bondage through recruitment fees
 - Passport confiscation
 - Unfair contracts and wage discrepancies
 - Poor living conditions
- **Subcontracting:** The multi-layered subcontracting system can obscure labour practices, making it difficult to monitor for forced labour or other abuses.

Asia (Bangladesh, Hong Kong, Laos, Malaysia, Philippines, Singapore, and Vietnam)

- **Forced Labour:** The region is known for risks of forced labour in sectors like:
 - Mining (for materials like sand, gravel)
 - Timber logging
 - Manufacturing of construction materials
- **Child Labour:** Child labour can be present in the production of bricks, tiles, and other materials.
- **Vulnerable Migrants:** Migrant workers from neighbouring countries are at high risk of exploitation due to:
 - Lack of documentation
 - Language barriers
 - Fear of deportation

We have also identified general supply chain risks in our operations.

- **Raw Materials:** Sourcing materials like timber, minerals, and aggregates from regions with weak governance can expose the company to risks of forced labour, land grabs, and environmental damage.
- **Manufacturing:** The production of steel, cement, and other construction components may involve factories with poor working conditions and labour rights violations.

4. The actions taken to assess and address modern slavery risks

4.1 Human Rights Policy

Nishimatsu Construction Group (hereinafter referred to as "the Group") conducts business activities with the corporate philosophy of "creating a sustainable society where people can live safely with valuable buildings and services" as our social mission. We believe that the fundamental human rights of all people involved in our business should be respected in realizing this philosophy and have formulated the Group Human Rights Policy based on the United Nations Guiding Principles on Business and Human Rights.

Please refer the following website link for Nishimatsu Construction Group Human Rights Policy (Japanese only). The English translation is available in Appendix A.

<https://www.nishimatsu.co.jp/company/policies.html>

4.2 Procurement Policy and Procurement Guidelines

In addition, the Group has formulated a procurement policy as follows and procurement guidelines based on the Corporate Philosophy and Code of Conduct. By obtaining the understanding of and active support from our partner companies, we are advancing ESG-conscious procurement activities via cooperation throughout the supply chain as a means of fulfilling our social responsibilities and realizing a sustainable society.

Procurement Policy

- | | | |
|--|---|---|
| 1. Compliance with laws, regulations, and social norms | 5. Environmental conservation activities | 8. Social contribution activity initiatives |
| 2. Fair and equitable transactions | 6. Assurance and enhancement of quality | 9. Business activity continuity in the event of disasters |
| 3. Respect for human rights | 7. Thorough information security and disclosure | |
| 4. Promotion of health and safety | | |

Please refer the following website link for Nishimatsu Construction Group Procurement Policy and Procurement Guidelines (Japanese only). The English translations are available in Appendix B and C.

<https://www.nishimatsu.co.jp/company/policies.html>

4.3 Human Rights due diligence processes

The Group has established a human rights due diligence system in accordance with the UN Guiding Principles on Business and Human Rights. This is a continuous process, based on our commitment to human rights (the Group's human rights policy), that spans from the identification of human rights issues in the Group's value chain, to the planning, implementation, monitoring, and disclosure of corrective actions, and finally, to communication with external stakeholders. We will strive to prevent and mitigate negative impacts on human rights that our company may have on society by continuously cycling through this entire process.

- (1) Identification and evaluation of human rights risks (negative impacts)
- (2) Integration of these risks within the Company's risk management system and implementing of appropriate measures
- (3) Follow-up survey on effectiveness of measures
- (4) Information disclosure

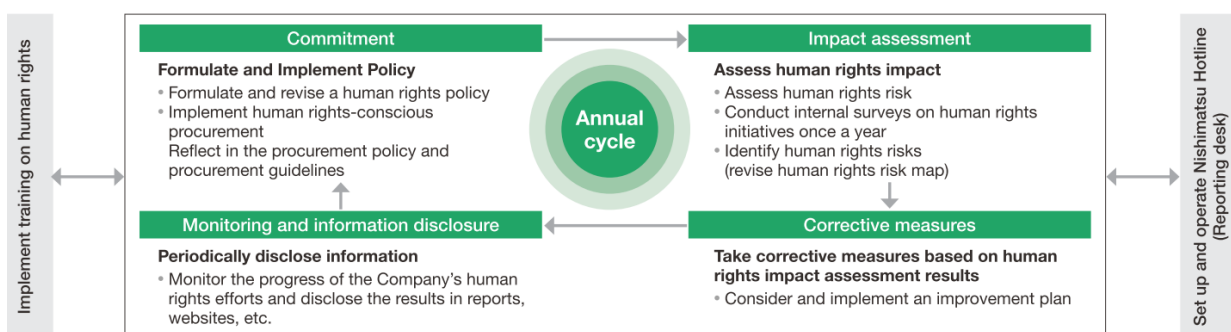


Fig 1 Human Rights due diligence process

In fiscal year 2024, the company conducted human rights due diligence on approximately 50% of key business partners, with a focus on N-Net member companies. As a result, the company identified 5% of the key business partners with high human rights risk.

In fiscal year 2025, the company plans to conduct interviews with these companies to verify facts, encourage improvement measures as necessary, and monitor the progress of those improvements.

5. Assessing the effectiveness of the actions taken

In April 2023, the Company established a sustainability promotion system, creating the "Sustainability Committee," an advisory body to the Board of Directors, and the "Risk and Opportunity Management Committee," aimed at company-wide management of risks and opportunities.

The Sustainability Committee, comprised of executive Directors, non-executive Directors, and external experts, deliberates on matters such as materiality from a long-term and multi-stakeholder perspective, and response policies to environmental changes (risks and opportunities) related to materiality, based on inquiries from the Board of Directors, and reports its findings to the Board of Directors.

Beyond addressing the initiatives of the committees above, the Sustainability Committee also deliberated on setting quantitative sustainability KGI (Key Goal Indicators) and identifying medium- to long-term risks, reporting its conclusions to the Board of Directors.

5.1 Sustainability promotion system

The Company has established the Sustainability Strategy Meeting to study and implement a sustainability strategy to resolve materiality issues and to realize a sustainable society. In tandem with this, we established four committees in critical areas within the meeting, namely the Risk and Opportunity Management Committee, Human Rights Committee, DE&I Committee, and Environmental Committee, and appointed a chairperson and secretariat for each.

The Sustainability Strategy Meeting consists primarily of assistant general managers of each business division and representatives of each strategy office. This meeting consolidates each of the committees and conducts their overall management, and then reports on their conditions to the President and General Managers Meeting. The Sustainability Strategy Meeting, which includes these four committees, will perform as the leader of the Company's sustainability strategy, and actively engage in discussions with new perspectives and driving the promotion of sustainability.

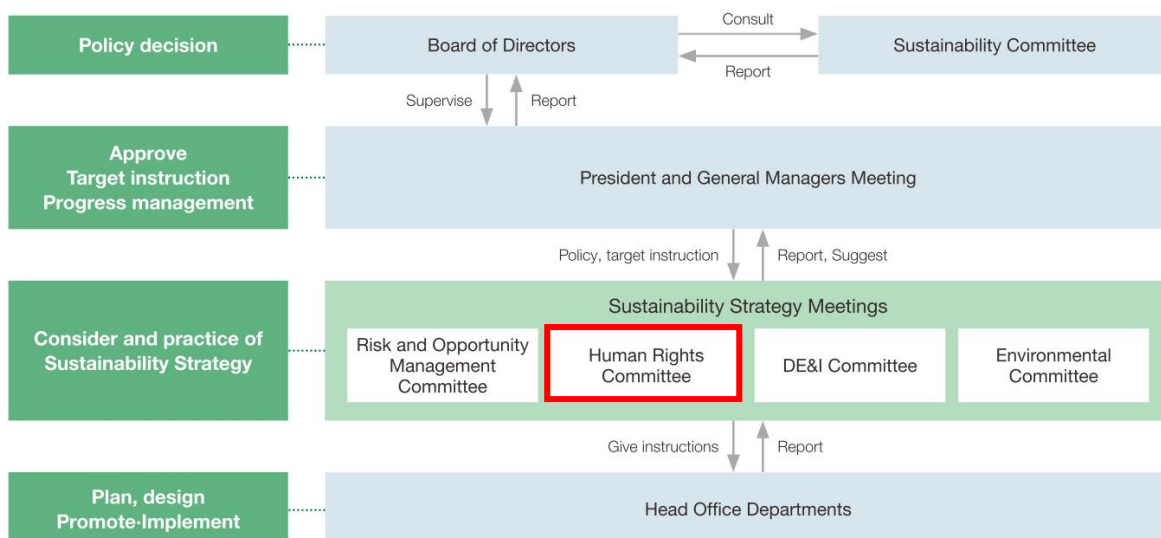


Fig 2 Sustainability promotion system

5.2 Human Rights Committee

Within the Sustainability Strategy Meeting, we have established a Human Rights Committee. The Human Rights Committee promotes initiatives targeting internal and external stakeholders based on our Human Rights Policy, including human rights due diligence in the supply chain.

Human Rights Committee assess the effectiveness of actions being taken to assess and address human rights risks as well as modern slavery risks annually to improve the company's response.

6. Approval of the statement

This statement has been approved by the Board of Directors on 31st July 2025.

1st August 2025



Masakazu Hosokawa
Representative Director and President

Appendix A.

Nishimatsu Construction Group Human Rights Policy

(English translation of the original Japanese text)

Human Rights Policy

The Nishimatsu Construction Group (hereinafter referred to as the "Our Group") conducts its business activities based on its corporate philosophy of "creating a sustainable society where people can live with peace of mind through valuable buildings and services" as its social mission. In realizing this philosophy, we believe that the fundamental human rights of all people involved in business should be respected, and we have formulated the Nishimatsu Construction Group Human Rights Policy based on the United Nations' Guiding Principles on Business and Human Rights. We will make this policy the basic stance of our business activities and promote efforts to respect human rights.

1. Scope of application:

This policy applies to all officers and employees (including seconded and temporary employees, etc.) of our group, including consolidated subsidiaries. Additionally, our group expects and urges our customers, business partners such as subcontractors, and supply chains to understand and support this policy.

2. Respect and compliance with norms and laws:

Based on the United Nations' Guiding Principles on Business and Human Rights, our group complies with human rights-related laws and regulations in the countries and regions in which we operate, as well as the International Bill of Human Rights, including the Universal Declaration of Human Rights, and the International Labour Organization ('ILO'). We support and respect international human rights standards such as the ILO Declaration on Fundamental Principles and Rights at Work and comply with these principles.

We also comply with the laws and regulations applicable in each country and region where we conduct business activities. When there is a conflict between the laws and regulations of a country or region and international norms, we will seek ways to respect international human rights norms.

3. Responsibility to respect human rights:

Our group will minimize the negative impact on human rights that may occur through our business activities by taking appropriate action when it becomes clear that our company is causing or contributing to a negative impact on human rights.

Our group strives to prevent industrial accidents and accidents, improve overwork, and long working hours, and promote the creation of a safe, sanitary, and healthy work environment and workplace that recognizes different cultures, customs, and values.

Furthermore, we prohibit all forms of child labour, forced labour, and human rights violations of foreign workers, and respect freedom of association and the right to collective bargaining. We ensure that all executive and employees (including seconded and temporary employees) have a working and living environment.

Our group respects human rights, including the safety and health of the local communities in which we operate, and strives to build good relationships and provide safe facilities to our users.

4. Initiatives to address human rights issues:

As the specific issues that our group must address change due to changes in society and business trends, we will engage in dialogue and consultation with stakeholders and outside experts and review our priority issues as appropriate. We are currently working on the following key issues as priority issues:

(1) Management of appropriate working conditions and creation of a comfortable working environment

The Group places emphasis on the work-life balance and continued work of all executives and employees (including seconded and temporary employees) in good health. To this end, we will thoroughly manage processes with sufficient margin and properly manage overtime work. In addition, based on our "Basic Safety and Health Policy," our group strives to create, maintain, and improve a safe, sanitary, and healthy working environment, prevent the occurrence of occupational accidents, and maintain a comfortable working environment.

(2) Prohibition of Harassment and Discrimination

Our group respects fundamental human rights, personality and individuality, and respects race, gender, nationality, age, sexual orientation, gender identity, religion, creed, ethnicity, disability, and physical characteristics. Prohibits all forms of discrimination, harassment, and unfair treatment based on social status, prohibits

power harassment that takes advantage of social status, and promotes initiatives to minimize disparities in treatment and wages in employment types.

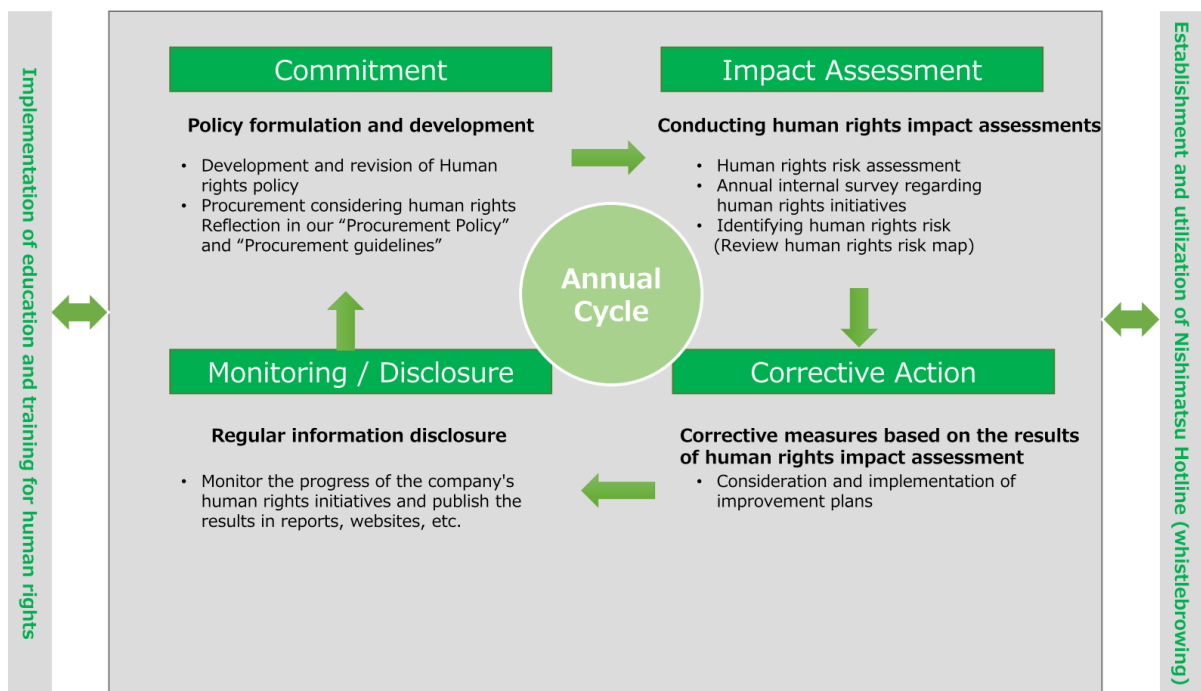
(3) Human rights of foreign workers

Our group will give appropriate consideration to the human rights of foreign workers, including foreign technical intern trainees, including their treatment.

5. Implementation of human rights due diligence:

Our group has established a human rights due diligence system and continuously improves the following processes.

- ① Identification and evaluation of human rights risks (negative impacts)
- ② Integration within the company governance system and implementation of appropriate measures
- ③ Follow-up survey on effectiveness of measures
- ④ Information disclosure



Due diligence process

6. Whistleblowing:

The Group operates the Nishimatsu Hotline, a whistleblowing system that allows reports to be made from within and outside the company and responds appropriately to reports of violations of human rights issues. The "Nishimatsu Hotline" is open to all employees, including those at overseas subsidiaries, as well as those outside the company. If you think there is a question about this policy, or if you wish to report a potential violation of this policy, please use this hotline.

7. Correction/Relief:

If it becomes clear that the company has caused or contributed to a negative impact on human rights, the Group will take appropriate action not only on all employees, including those at overseas subsidiaries, but also outside the company, including partner companies. We will work to correct and provide relief through appropriate means. In addition, the Compliance Promotion Department operates the Nishimatsu Hotline, which conducts regular monitoring to ensure that no negative impacts are caused or exacerbated in the supply chain, including our group and partner companies.

8. Human rights governance and promotion system:

The Board of Directors considers human rights issues as an agenda item, regularly reviews this policy and human rights risks, and conducts and supervises investigations into the existence of human rights violations in the supply chain. Our human rights issues are considered under the supervision of the Human Resources Department in Japan and the International Business Headquarters at overseas locations.

9. Education/Training:

In order to ensure that this policy is firmly established throughout our business activities, our group will reflect the idea of our human rights policy in the necessary procedures, and ensure that all executives and employees of our group (including seconded and temporary employees, etc.) We will carry out the necessary education and training to gain a sufficient understanding of this policy.

10. Dialogue and consultation with stakeholders:

The Group will continue to engage in dialogue and consultation with relevant stakeholders and outside experts regarding responses to actual or potential negative impacts on human rights.

11. Disclosure of Information:

Our group will regularly disclose on our website and other means our efforts to respect human rights based on this policy.

Date of enactment: March 1, 2023
Nishimatsu Construction Co., Ltd.
Representative Director and President
Masakazu Hosokawa

Appendix B.

Nishimatsu Construction Group Procurement Policy

(English translation of the original Japanese text)

Procurement Policy

Nishimatsu Construction “Creates a sustainable society where people can live with peace of mind through valuable buildings and services.” Based on our corporate philosophy, we engage in procurement activities together with our customers based on the "Procurement Policy" set out below.

1. Compliance with laws and social norms

- We comply with laws and social norms, both domestically and internationally.

2. Fair and just transactions

- As equal partners, we promote fair and impartial transactions, and select business partners based on quality, safety, and
- We perform a comprehensive evaluation of performance, price, delivery date, technical capabilities, business conditions, environmental impact reduction, etc.

3. Respect for human rights

- We respect individuality and human rights and strive to ensure appropriate working conditions.

4. Promotion of safety and hygiene

- In accordance with our basic safety and health policy, we maintain a safe, healthy and comfortable working environment and prevent occupational accidents.

5. Initiatives for environmental conservation

- In accordance with our environmental policy, we will protect the natural environment and strive to reduce our environmental impact.

6. Ensuring and improving quality

- We strive to ensure and improve quality in accordance with our quality policy.

7. Thorough information security and information disclosure

- Whether inside or outside the company, we must comply with confidentiality obligations regarding confidential information obtained through procurement activities.
- On the other hand, we will provide and disclose necessary information to stakeholders in a timely and appropriate manner under the confidentiality obligation.

8. Initiatives in social contribution activities

- We deeply recognise that our corporate activities are closely connected to local communities, and we contribute to the development of society and local economy.

9. Continuation of business activities in the event of a disaster

- We establish a management system in order to contribute to the business continuity of the national, local, and corporate sectors in the event of a large-scale disaster.

Date of enactment: March 1, 2023

Nishimatsu Construction Co., Ltd.

Representative Director and President

Masakazu Hosokawa

Appendix C.

Nishimatsu Construction Group Procurement Guidelines

(English translation of the original Japanese text)

Procurement Guidelines

Nishimatsu Construction has established a "Procurement Policy" based on its "Corporate Philosophy" and "Code of Conduct," and is committed to promoting procurement activities that take CSR (Corporate Social Responsibility) into consideration. We believe that it is important for us to work together with our business partners throughout the supply chain in order to promote sound business activities. We ask that our business partners understand our "Procurement Policy" and cooperate in actively working on the following items.

1. Compliance with laws and social norms

We ask that all of our business partners comply with all laws and social norms in every country and region where they conduct business activities.

- Thorough compliance
- Compliance with relevant laws and regulations, including the Construction Business Act, and compliance with guidance from supervisory authorities based on these laws and regulations.
- Prohibition of bribery and illegal political donations
- Prohibition of abuse of superior position
- Prohibition of inappropriate provision and receipt of benefits
- Severance of relationships with anti-social forces

2. Fair and just transactions

We request that you select business partners based on fair and impartial evaluations of factors such as price, certainty of delivery, technical capabilities, financial standing, safety, quality, and environmental considerations.

- Realization of fair and impartial competition
- Provision of fair business opportunities and information
- Transactions on an equal footing

3. Respect for human rights

We ask that you, our business partners, strive to implement the following human rights initiatives in your business activities:

- Respect the human rights of employees, pay attention to appropriate working hour management and securing holidays and vacations, and realize a workplace environment where they can work in a healthy and safe manner.
- Respect human dignity and diversity, prohibit discrimination based on gender, race, nationality, age, religion, disability, marital status, physical characteristics, sexual orientation, etc., acts that infringe on human rights and cause mental and physical pain, such as harassment, and all discriminatory speech and behaviour.
- Prohibit unfair labour practices such as child labour and forced labour.

4. Promotion of safety and hygiene

We ask that you strive to ensure a safe and comfortable workplace environment with consideration for occupational safety and health.

- Maintaining high occupational safety and health standards
- Preventing occupational accidents and incidents
- Appropriate health management for your own employees
- Development of a safe, sound, and comfortable workplace environment

5. Initiatives for environmental conservation

We request that you actively engage in business activities that are environmentally conscious.

- Implementation of activities to reduce environmental impact
- Reduction of greenhouse gas emissions
- Active engagement in biodiversity conservation
- Promotion of waste reduction and recycling
- Compliance with environmental laws and regulations, and establishment, maintenance, and improvement of environmental management systems

6. Ensuring and improving quality

We ask that you strive to further improve the quality assurance of construction, products, and services in order to realize the highest level of customer satisfaction.

- Implementation of a quality management system
- Stable supply of materials and labour, and adherence to delivery and construction schedules
- Improvement of construction technology and promotion of technological development.

7. Thorough information security and information disclosure

We ask that you thoroughly manage and protect confidential information, personal information, and customer information handled in connection with your business, and strive to ensure information security.

- Prevention of leakage of information obtained in the course of business, such as confidential information and trade secrets
- Strict management of personal information and establishment of preventive measures against leakage, theft, alteration, destruction, etc.
- Prevention of infringement of intellectual property rights, etc.
- Timely and appropriate disclosure of company information to stakeholders

8. Initiatives in social contribution activities

We request your cooperation in participating in social contribution activities.

- Promotion of social contribution activities to local communities using management resources
- Active participation in our activities, such as cleaning activities around work sites

9. Continuation of business activities in the event of a disaster

In the event of a large-scale disaster or accident, we request your cooperation in maintaining supply continuity while sharing supply chain information, including your business partners, and that you establish an emergency risk management system.

- Responding to emergency support requests and supplying materials and equipment in the event of a large-scale disaster, etc.
- Developing a business continuity system in anticipation of emergencies such as large-scale disasters.

Date of enactment: March 1, 2023
Nishimatsu Construction Co., Ltd.
Representative Director and President
Masakazu Hosokawa