

MODERN SLAVERY STATEMENT 2024 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 2024 (**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, Icon Developments Australia Pty Ltd, Kajima Development Australia Pty. Ltd. and Kajima Capital Oceania Pty Ltd submit their own joint modern slavery statements. 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 \$1.5 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. KIH's registered office is C/- Pitcher Partners Advisors Pty Ltd, Level 13, 664 Collins Street Docklands VIC 3008

Our operations include various unincorporated Joint Ventures for example 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 799 staff of which 14 were casuals, 757 were full time and 28 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 / cadets
- Project coordinators
- Design (design coordinator, design manager)
- Services (service coordinator, service manager)
- Planning
- Estimating
- New business
- Submissions coordination
- Risk / 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)
- Regional / Divisional Managers
- Safety (safety coordinator, safety manager)
- Quality (quality coordinator, quality manager)
- Executive Management (CEO, etc.)

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 first tier supply chain remains unchanged from our 2023 Statement. It is primarily comprised 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 activities continue to be delivered through the standard subcontracting model commonly used in the construction industry. Under this model, trade work is predominantly undertaken either by subcontracting businesses that provide all materials, labour, supervision and plant, or by material suppliers whose products are installed by other subcontractors engaged on the project.

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

During the Reporting Period, the use of iPro modern slavery software, which was implemented in 2023, has become further established across our procurement processes (explained in further detail in sections 3.1 and 4.4)¹.

The iPro software has provided further valuable information regarding our first-tier suppliers and has consistently generated superior visibility of our second-tier suppliers. This means we are better positioned to identify that significant numbers of our suppliers operate, produce and source goods across the following sectors:

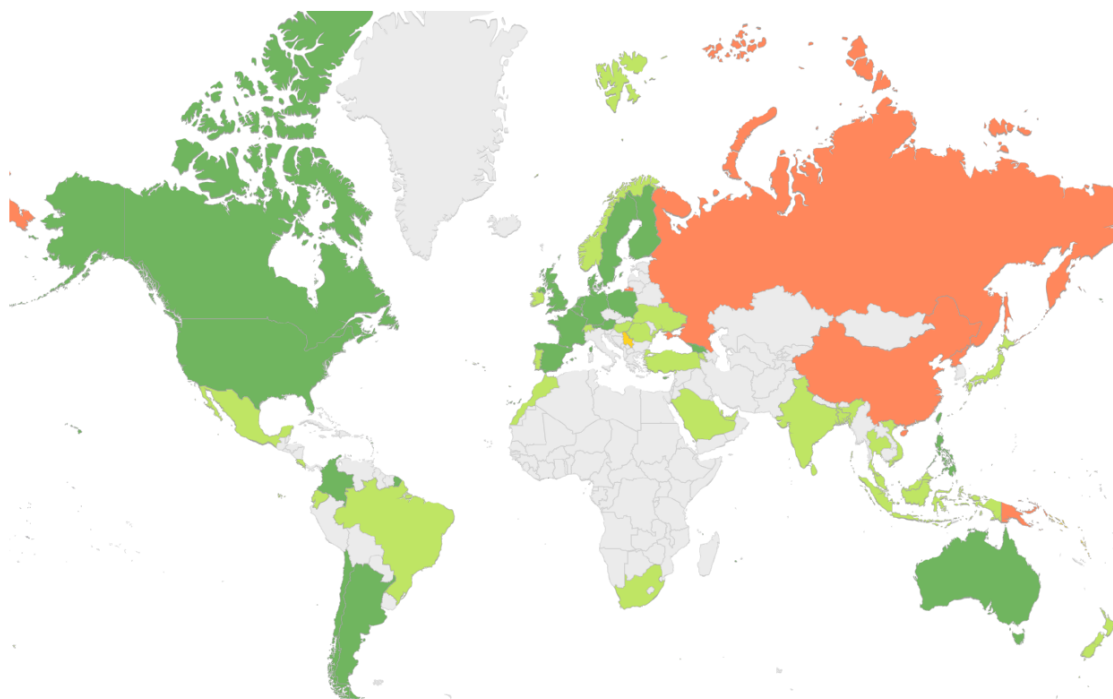
- Accommodation and food service activities
- Building Services
- Construction
- Manufacturing
- Mining and quarrying
- Transportation and storage
- Wholesale

The iPro software has continued to improve 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 (91%).

We have a small number of suppliers operating in China, 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 as at December 2024 and provides a snapshot of the countries where our first-tier suppliers have operations.

¹ In this statement, all data and graphics sourced from iPro are based on an iPro Insights Report dated 24 December 2024.



■ 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 2 Watch List

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.

■ Tier Special Case

Due to civil conflict and humanitarian crises, gaining information is difficult and a tier has not been assigned.

■ Uncategorized

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 2024 Reporting Period, Icon maintained its use of the iPro Modern Slavery Assessment Tool (**MSAT**). Further details on system implementation can be found in our 2023 Statement .


Icon considers the risks of modern slavery to be largely unchanged from the 2023 reporting period with minor adjustments to both the Inherent and Unmitigated risk scores (refer below).

In December 2024, Icon conducted its annual risk assessment of its supply chain using iPro to evaluate suppliers for modern slavery risk. The total responses increased from 1361 in December 2023 to 1520 in December 2024 reflecting an 11.7% rise.

Suppliers using MSAT must complete an on-line self-assessment questionnaire covering their sectors operational locations, sourcing practices and existing modern slavery controls. Once submitted, responses are processed within the iPro system to generate their modern slavery risk score and assign a corresponding risk category. Additionally, due diligence step, suppliers are required to upload supporting documentation.

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

Most of our direct employees remain 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, our project teams monitored operational risks across our Pacific region projects in Fiji, the Solomon Islands and Vanuatu. 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.

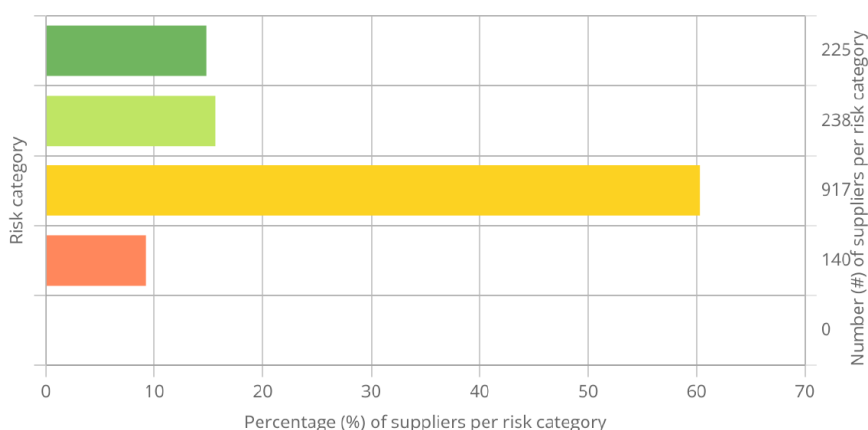
3.3 Modern slavery risk assessment of our supply chain

Using the iPro modern slavery assessment software, we found the majority (60%) of assessed suppliers were categorized as a ‘medium risk (partial risk control)’. This represents a slight decrease from the 2023 Statement. 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.

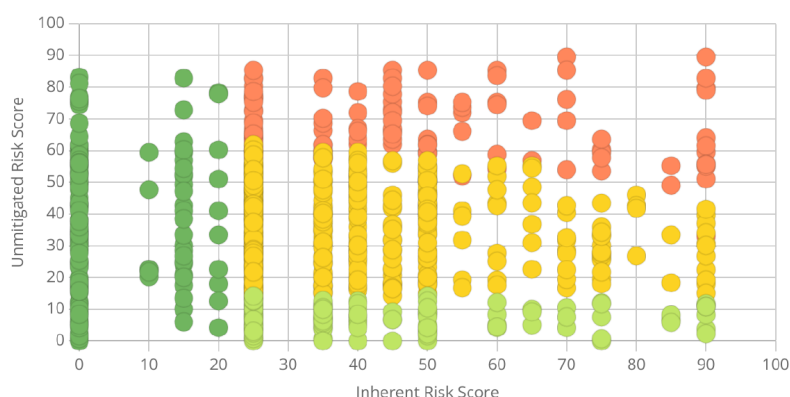
We also found that a small proportion (9.2%) of assessed suppliers were categorised as ‘high risk (inadequate risk control)’ which reflects a 3% increase from the 2023 Statement. This indicates that these suppliers have a high to moderate inherent risk of modern slavery, based on their Unmitigated Risk Score, and inadequate risk controls, based on their Unmitigated Risk Score.

We continued to have no assessed suppliers categorised as having ‘high risk (high levels of inherent risk)’, which indicates ‘very high’ levels of inherent modern slavery risk.

Supplier assessment results



Risk categories	% of suppliers per risk category	# of suppliers per risk category
Low-Risk (No inherent risk)	14.8%	225
Low-Risk (Adequate risk control)	15.7%	238
Medium-Risk (Partial risk control)	60.3%	917
High-Risk (Inadequate risk control)	9.2%	140
High-Risk (High levels of inherent risk)	0%	0



Inherent risk of suppliers

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

- 81% (2023: 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.
- 41.1% (2023: 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.
- 61.3% (2023: 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 in which our first tier suppliers operate, produce and source goods from sectors including retail, wholesale and transportation and storage.

It is not clear from our ongoing iPro assessments 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. We intend to implement practical measures to review procurement records which will enable us to engage with relevant suppliers to confirm and address these risks at a more granular level during the next reporting periods.

The construction sector remains highly vulnerable to 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 maintained or identified the following improvements across risk controls from the 2023 reporting period:

- 81% (2023: 80%) of assessed suppliers operate in at least one sector of high risk
- 61% (2023: 60%) of assessed suppliers issue a policy prohibiting all forms of discrimination
- 16% (2023: 15%) of assessed suppliers conduct a formal vulnerability assessment of their works to slavery and human trafficking
- 100% (2023: 100%) of suppliers have some element of work to undertake to address Modern Slavery supply chain risk
- 70% (2023: 70%) of assessed suppliers issue a policy explicitly ensuring wages meet applicable host country legal requirements
- 44% (2023: 42%) of assessed suppliers issue a policy prohibiting the procurement of commercial sex acts during the length of a contract
- 58% (2023: 56%) of assessed suppliers issue a policy explicitly prohibiting all forms of forced labour and human trafficking
- 49% (2023: 48%) of assessed suppliers issue a policy prohibiting charging recruitment fees

In the next reporting period, we intend to continue exploring practical and effective measures to better engage with our high risk suppliers identified by iPro to encourage and support the improvement of their risk control procedures and processes. We will report on these actions in our next modern slavery statement.

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

Inherent risk score 30.25 out of 100	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).
Unmitigated risk score 35.73 out of 100	The level of risk still present after accounting for modern slavery risk controls that have been implemented in your supply chain.

This represents an increase of 4.7% in our Inherent Risk Score and 0.1% in our Unmitigated Risk Score with an increase of suppliers assessed from 1361 to 1520 (11.7% increase) which is reflected in the increase in our High Risk suppliers from 6.8% to 9.2% during 2024.

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

We did not identify any incidences or practices of modern slavery during the 2024 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. 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.

If Icon 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 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 developed and rolled out a new Whistleblower Policy and Recruitment Policy. Icon introduced a new anonymous reporting hotline, in partnership

with an independent third-party provider, PKF Integrity. This service allows all employees, subcontractors and partners to report unethical, illegal, or undesirable conduct.

Icon has also continued to develop our internal training and embed this across the business.

We continued to monitor our project teams understanding of the modern slavery policies, procedures and systems in 2024 through our internal project Commercial Reviews.

4.4 **Supplier onboarding and engagement**

In December 2024, as part of Icon's ongoing use of the iPro MSAT to assess supply chain risk, all existing suppliers were requested to complete the iPro assessment process as described in section 3.1 above. By the end of the Reporting Period, 1520 of our suppliers had completed the assessment.

During the 2024 period, we updated our supplier onboarding and engagement process as follows:

- Hard copies of the supplier questionnaires, tender interviews and risk action plans were replaced by the new iPro software.
- For all new suppliers on Icon's projects and documented in our commercial procedures:
 - 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.

New suppliers for our construction projects underwent a staged accreditation process, to verify financial viability, compliance with OWH&S standards, and alignment with Icon's commercial, policy and operating requirements.

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

Icon's suppliers remain contractually 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.

To strengthen the integration of the iPro MSAT process, we purchased **ProcurePro** in Q4 2024 enhancing control, document management, and compliance visibility for Divisional Managers to review compliance with our Modern Slavery process requirements.

Implementation will be phased across Q1 & Q2 2025 with ongoing enhancements to improve supplier compliance. An update on the progress of this implementation and its impact on risk mitigation will be included in our next **Modern Slavery Statement**.

Offshore Procurement Team

Building on our 2023 statement, Icon maintained engagement with our Offshore Procurement Team, which oversees sourcing of Joinery and Façade, typically from China. Previous risk

assessments indicate that this type of procurement carries product and geography-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 teams during project reviews and regular engagement 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 2024 Reporting Period.

In future reporting periods, we will explore practical ways to leverage offshore resources and the international mobility of the Australian-based Offshore Procurement Team to enhance supplier inspections of suppliers, including prescribed checklist items, to mitigate the risks identified in our updated assessment process.

4.5 **Internal training**

In addition to the training undertaken with our Offshore Procurement Team, we continued to support our 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 have been updated to align with the updated processes and relaunched in 2024,. 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 2023 statement to assess and address modern slavery risks in the operations and supply chain of pilot projects and the broader business.

We are exploring practical and technological solutions to enhance project team and supplier engagement to improve the identification and mitigation of Modern Slavery Risks.

5.1 **Assessing effectiveness**

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 continue 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 aim to establish reporting processes that utilize individual supplier scores to track progress and evaluate effectiveness of actions taken by high risk suppliers.

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

During the next reporting period, we will enhance the promotion, implementation and effectiveness of our modern slavery compliance systems and processes through the following measures:

- Continuing our annual supplier survey of our entire supply chain using the iPro MSAT commencing late 2025 and targeting a year on year improvement from 33% in 2023.
- Review all Icon, Whistleblower, recruitment, Modern Slavery policies and related documentation such as our Code of Conduct
- Reinforcing and driving better adherence to our supplier onboarding process embedded within our pre-procurement procedures and contract administration processes which utilizes IPro's assessment and risk-mitigation tools

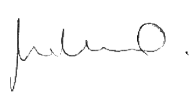
- Update our internal training program to deliver mandatory compliance training for all internal employees during 2025, with a target to deliver external training to all active on site suppliers by the end of the year linked to the supplier onsite onboarding procedures
- Identifying and implementing more effective methods to engage 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 Q1 2026 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 2025 and 2026 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 26/6/25.



Mike Read
CEO/Managing Director
Kajima Icon Holdings
Date 26/6/25

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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

Reporting Criterion	Page
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