



Modern Slavery Statement

2023



About this statement

This statement has been made on behalf of Summerset Group Holdings Limited, ARBN 59 164 228 399 (Summerset) and is made pursuant to the Modern Slavery Act 2018 (Cth) in respect of Summerset and all entities owned or controlled by Summerset for the year 1 January 2023 to 31 December 2023.

This statement was approved by the board of Summerset on 24 April 2024.



Mark Verbiest

Chair

24 April 2024

Message from the Chair and Chief Executive Officer

Welcome to Summerset's modern slavery statement for the 12 months ended 31 December 2023.

People are the heart of Summerset, demonstrated through lots of great initiatives in its workplaces and communities. As part of this, Summerset has an ongoing plan to actively identify and work to eliminate all forms of modern slavery in its supply chain. Summerset is dedicated to continuous improvement in this area and has continued to build on its work in previous years.

Mark Verbiest

Chair



Scott Scoullar

Chief Executive Officer



“Bringing the best of life” to residents
is at the core of what Summerset does.



BRINGING THE BEST OF LIFE



SUMMERSET STRATEGY

Summerset's strategy covers our short- and long-term goals for the next 10 years. It helps us prioritise our work to ensure we stay on the path that points toward our purpose: to bring the best of life.

Three principles guide us in the strategy:

- Our people lead the change
- Provide our residents with the best life
- Deliver appropriate returns to the shareholders who help fund our business

We have six strategic pillars, each with a number of initiatives under them, that we'll pursue over the next 10 years to grow and continue delivering great experiences for our residents and staff.

Our pillars are: Invest in our People, Deliver New Zealand's best retirement villages, Grow in Australia, Be a good corporate citizen, Create attractive new products and services and Be a more efficient and effective business.

For more information about the Summerset group, please see Summerset's annual report¹, website² and Sustainability Review and Climate-Related Disclosures³.

¹ <https://www.summerset.co.nz/investor-centre/reports-and-presentations/>

² <https://www.summerset.co.nz/>

³ <https://www.summerset.co.nz/investor-centre/esg-reporting/>

MANDATORY CRITERIA ONE AND TWO:

Summerset

Reporting entity

The reporting entity is Summerset Group Holdings Limited, ARBN 59 164 228 399. Its New Zealand and Australian subsidiaries either do not carry on business in Australia, or do not meet the revenue threshold, to separately qualify as reporting entities.

Structure

Summerset is an NZX and ASX listed company with a market capitalisation of over NZD\$2.6 billion and has grown to be one of New Zealand's leading and fastest growing retirement village operators.

The listed entity is Summerset Group Holdings Limited, publicly traded on the NZX (being the company's primary exchange) under ticker quote SUM, and on the ASX (as a foreign exempt listing) under SNZ. Summerset Holdings Limited is wholly owned by Summerset Group Holdings Limited and is the holding company for the New Zealand operational entities. The Australian holding company is Summerset Holdings (Australia) Pty Limited, which is wholly owned by Summerset Holdings Limited.

Operations

Summerset's business spans development, design and construction, through to running retirement villages and care centres, providing a continuum of care from independent and assisted living options to aged care.

Summerset has 40 villages (either completed or in development) and 11 greenfield sites earmarked for potential future development across New Zealand and Australia.

"Bringing the best of life" to residents is at the core of what Summerset does. Summerset's community is made up of more than 8,000 residents in over 6,000 retirement units and over 1,250 care units across its retirement village sites.

Summerset has a land bank of over 5,500 retirement units and over 1,300 care units for future development in New Zealand and Australia. In 2023, Summerset built 643 new units and 49 care beds, making Summerset one of the top residential builders in New Zealand. Summerset achieved a major milestone in its Australian build programme in 2023 completing the first stage of villas at its Cranbourne North village with our first Australian residents moving in during Q1 2024. Additionally, as part of expanding its Australian operations Summerset in parallel to expansion in Victoria, has started investigating opportunities in Queensland.

Summerset's development and construction teams continue to grow Summerset's portfolio of high-quality comprehensive care retirement villages with amenities and facilities designed for New Zealand and Australian retirees.

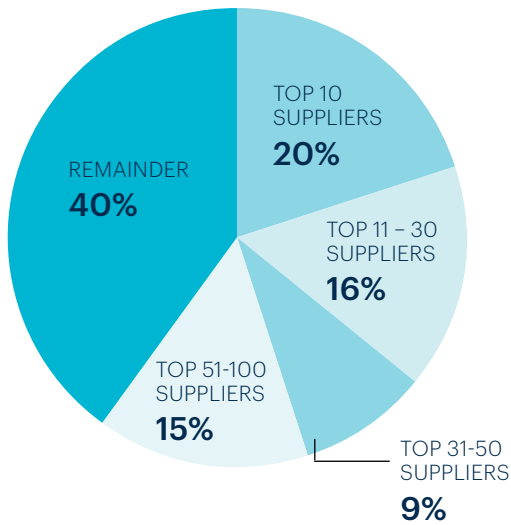
Summerset employs over 2,800 staff members across its offices, construction sites and retirement villages in New Zealand and Australia. Summerset strives to create a great place to work, where people can thrive.

Supply chain

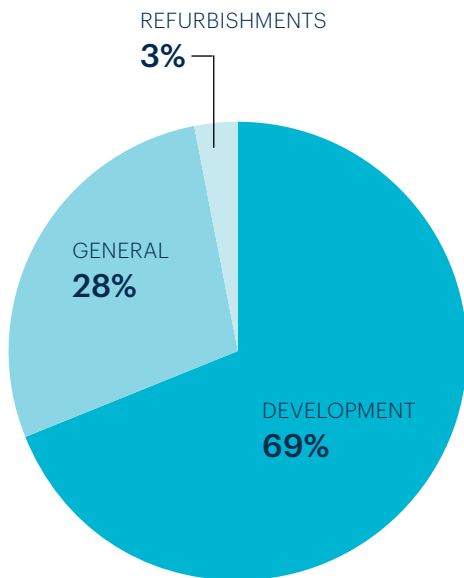
Summerset relies on its suppliers and contractors to help it bring the best of life to its residents.

Summerset has a procurement function that manages whole of Summerset contracts for the provision of specific goods or services commonly used within the Summerset group's

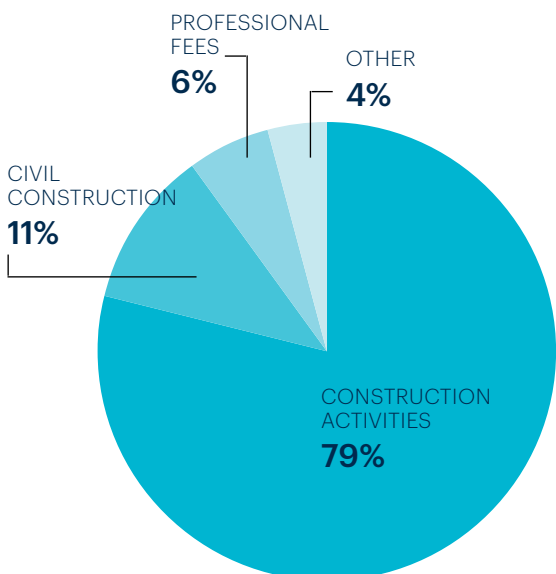
SPEND BY TOP 50 SUPPLIERS



SPEND BY ACTIVITY



SPEND BY CONSTRUCTION ACTIVITIES



construction activities: this covers a range of high value contracts. This construction procurement function covers a substantial proportion of supplier spend across the Summerset group and is complemented by distributed on-site management of day-to-day materials supply and local purchasing within other operational divisions.

Summerset prefers to develop longer term partnerships with its suppliers and contractors. Competitive tender processes are used to evaluate alternatives and to monitor the market and potential suppliers and contractors. Summerset expects its suppliers and contractors to comply with Summerset's standards and expectations, including on modern slavery. This expectation is supported by a Supplier Code of Conduct, which references remediation of modern slavery risks, alongside other procurement goals.

Summerset's supply chain is extensive and diverse. In the 12 months ending 31 December 2023, Summerset spent approximately NZD\$612 million with approximately 3,800 suppliers. The top 50 suppliers supported approximately 45% of Summerset's total spend in 2023.

The most significant expenditure in Summerset's supply chain is within the following major categories:

- construction of villages and care centres;
- refurbishment of villages and care centres;
- ongoing maintenance to villages and care centres;
- operations including food services, medical supplies, consumables and support equipment;
- business administration including professional services, consultancy, IT, insurance, and head office support.

Summerset has an extensive development and construction programme across New Zealand and Australia, delivering 643 homes under Occupation Right Agreement and 49 care beds in the 2023 financial year, to keep up with customer demand.

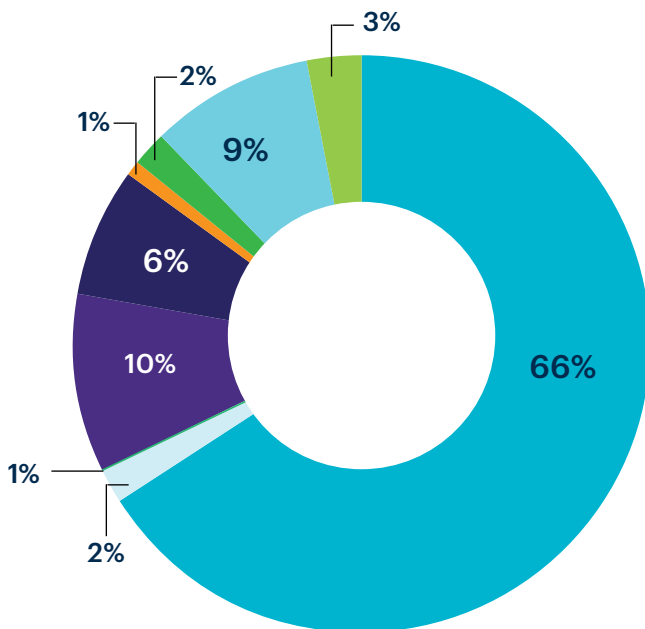
The spend on development activities across both New Zealand and Australia continues to be Summerset's largest category of expenditure, making up 69% (NZD\$421 million) of Summerset's spend in 2023, with refurbishments and ongoing maintenance to existing villages and care centres making up a further 3% of expenditure. A further breakdown of construction spend is shown on page 6.

The nature of Summerset's other more general expenditure is described further in the below pie graph. Over 66% of Summerset's categorised spend is with suppliers that support the construction of villages around New Zealand and Australia, with 10% of suppliers remaining uncategorised. Under Summerset's general operations expenditure, the purchase of medical services and consumables makes up 0.4% of total spend, with food services making up 1.5% of total spend.

Tier 1 suppliers to Summerset are principally based locally in New Zealand and Australia. In total, 93% of spend is on the New Zealand business, and the remaining 7% on the Australian expansion.

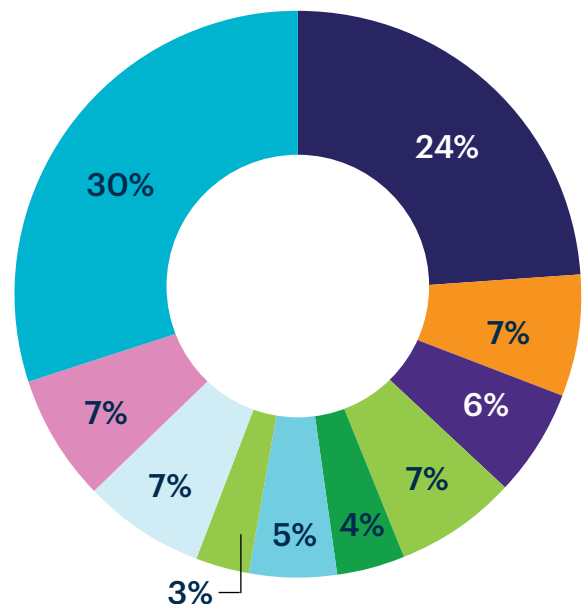
The development of broadacre villages throughout New Zealand has meant Summerset's spend is spread around the regions, and is split between consultants, civil construction activities, construction labour and materials.

SPEND BY SUPPLIER CATEGORY



- CORPORATE
- NOT CATEGORISED
- COUNCIL
- OPERATIONS
- DEVELOPMENT
- PROFESSIONAL SERVICES
- ICT
- UTILITIES
- NON-CONTESTABLE

SPEND BY REGION



- AUCKLAND
- TARANAKI
- BAY OF PLENTY
- TASMAN
- CANTERBURY
- MELBOURNE
- HAWKES BAY
- WAIKATO
- NORTHLAND
- WELLINGTON

Summerset is committed to developing and maintaining a robust group-wide response to modern slavery.



MANDATORY CRITERION THREE:

Identifying modern slavery risks

Summerset continues to identify and manage modern slavery risks over four categories: business structure risk; geographic risk; sector and industry risk; and product and services risk.

Business structure risks of modern slavery

Summerset's procurement function provides visibility into our Tier 1 suppliers (suppliers directly contracted by Summerset). Summerset has more limited visibility into upstream parts of the supply chain.

Based on Summerset's surveys⁴ of its New Zealand and Australian supply chains:

- 30% of suppliers have a form of anti modern slavery policy, and 20% have trained staff on identifying and remediating modern slavery risks. 12% of suppliers are reporting entities under some form of modern slavery or human rights laws.
- 39% of suppliers perform screening of all prospective upstream suppliers to assess modern slavery risks and 23% require upstream suppliers to conduct due diligence for modern slavery risks on their own upstream suppliers. Summerset's suppliers' visibility of their own upstream suppliers is developing.
- 17% of suppliers conduct due diligence for modern slavery risks on their upstream suppliers.
- 18% of suppliers engage in other activities to identify, prevent and mitigate modern slavery risks in their operations and supply chains.

Continuing to gain greater transparency and control over the upstream aspects of the supply chain continues to be an area of focus.

Summerset believes that the risk of modern slavery in our directly employed workforce is low

due to our internal policies and processes, and our risk management framework.

Geographic risks of modern slavery

Summerset operates in New Zealand and Australia.

The 2023 Global Slavery Index developed by Walk Free estimates the proportions of the population of New Zealand and Australia living in modern slavery as 1.6/1,000 and 1.6/1,000 respectively⁵. New Zealand and Australia are also top scoring countries on the Corruption Perceptions Index 2023 produced by Transparency International; ranked 3rd and 14th respectively⁶. Overall, New Zealand and Australia have a relatively low risk of modern slavery.

Against that background, Summerset Group employs over 2,800 staff, working across New Zealand and Australia. Summerset's purpose is to "bring the best of life" to residents. Summerset's work is guided by its values – One Team, Strong Enough to Care, Strive to Be the Best. Together the purpose and values deliver a strong, positive culture for staff. Summerset is dedicated to building a diverse and inclusive workplace where all staff feel valued and included and can bring the best of themselves to work. Summerset has a number of policies in place to support this including: the company's diversity and inclusion policy, a code of conduct, a policy on workplace bullying, harassment and discrimination, and whistleblowing policies for both New Zealand and as of 2023 Australia. These are supported by an anonymous "Fair Call" whistleblowing hotline managed by an external third party, which staff can use to report wrongdoing, including any allegations concerning modern slavery issues, 24/7. This work is further supported by the Diversity and Inclusion Steering Group, made up of a broad cross-section of staff to support the design and development of diversity and inclusion initiatives centred around meaningful goals and targets.

Together, the geographic location of operations, positive work culture, and strong policies and procedures, significantly limit the risk of modern

⁴ Based on surveys completed in 2022 of over 100 suppliers.

⁵ <https://www.walkfree.org/global-slavery-index/country-studies/new-zealand>

<https://www.walkfree.org/global-slavery-index/country-studies/australia/>

⁶ <https://www.transparency.org/en/cpi/2023>

slavery practices within Summerset Group's own operations.

Beyond its own operations, Summerset recognises that its supply chains extend beyond New Zealand and Australia. Tier 1 suppliers to Summerset are principally based locally in New Zealand and Australia. Upstream parts of the supply chain have a wider reach. Where this is the case, Summerset acknowledges that some countries may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty. It is also possible that the economic and social effects of the Covid-19 pandemic may have increased modern slavery risks in some areas.

Sector and industry risks of modern slavery

Certain sectors and industries may have elevated modern slavery risks because of their characteristics, products and processes. Summerset has identified high-risk product and service categories that may exist within its supply chains, as follows.

- The construction sector has an elevated risk of modern slavery due to its long and complex supply chains, use of base-skilled labour, and sourcing of raw materials.
- Summerset operates more broadly within the wider health care sector, which carries its highest risk of modern slavery in the procurement of medical goods such as gloves, garments and electronics.

- The food and beverage sector has a high-risk of modern slavery due to the nature of the work involved in the production, processing, packaging and transport of food. Specific product categories sourced by Summerset within this sector are known to be associated with modern slavery practices, such as coffee, cocoa, sugar, and bananas.

Summerset has continued to prioritise assessment of first tier suppliers within identified high-risk product and service categories and with whom a significant proportion of Summerset's business spend lies.

Construction activities are a significant part of Summerset's business. On average, Summerset delivers approximately 600 new homes each year, making Summerset one of New Zealand's largest home builders. Summerset's Australian retirement village sites are now well into their construction phases with activity ramping up as growth continues.

The construction sector has an elevated risk of modern slavery within its operations and supply chains as a result of various risk factors.

- Outsourcing and long and complex supply chains are prevalent in the sector, with numerous and sometimes short-term engagements for various workstreams in place across multiple sites, with enterprises of varying sizes. This can decrease the visibility of modern slavery risks within the supply chain.



High demand for low-skilled labour force



Poor visibility over long and complex supply chains



Low-tier suppliers operating in high-risk geographies

- Overseas raw materials in the supply chains for the construction sector can be sourced from locations with a relatively higher risk of modern slavery, contributed to by conflict, poverty, weaker rule of law, and fewer human rights protections. Raw materials for the sector posing higher risks of modern slavery include bricks, clay, lime and cement materials.
- There is also a high demand within the sector for base-skill workers, who can be more vulnerable to exploitative practices.

Summerset’s construction activities in New Zealand are generally managed internally by project and group construction managers employed by Summerset. Under this model, contractors and consultants carrying out particular elements of the works for a project are appointed by Summerset directly. The traditional model within the construction sector, of a main or general contractor appointed by Summerset (with others being suppliers or sub-contractors to that main or general contractor), is not generally used by Summerset in New Zealand. The direct engagement model preferred by Summerset’s New Zealand operations gives Summerset a high degree of visibility and control over its construction operations and supply chain in New Zealand, relative to that within the sector generally.

Cranbourne North was Summerset’s first Australian site to begin construction. Significant progress has been made with the first homes delivered and the village operational with residents living on site from Q1 2024. Summerset has continued with its business model in Australia of appointing main contractors for its construction projects. The contractor selection and engagement processes require tenderers to state how they are identifying and managing modern slavery risks. As Summerset’s internal construction management function in Australia matures, the direct engagement model applied in New Zealand may over time be preferred.

In addition to these construction procurement processes, Summerset’s Tier 1 construction suppliers are principally based locally in New

Zealand and/or Australia, which are relatively lower risk geographic locations. These factors together act to mitigate modern slavery risks within Summerset’s construction activities. However, Summerset recognises that the construction sector generally remains a higher risk sector.

Product and services risks of modern slavery

Certain products may have higher modern slavery risks because of the way in which they are produced, provided, or used. Similarly, certain services that often involve lower wages, manual labour, and outsourcing, may also carry an elevated risk of modern slavery practices.

The types of products and services that Summerset has scoped as carrying a higher modern slavery risk within Summerset’s operations and supply chains include:

- cleaning and catering services, representing industries that frequently utilise migrant workers who are often vulnerable to underpayment, withholding of wages and excessive working hours;
- certain raw materials in the supply chains for the construction sector including bricks, clay, lime and cement materials, textiles and natural rubber; and
- products used in Summerset’s clinical operations such as gloves, masks, PPE, medical goods, garments, and pharmaceuticals.

In 2022, a review was undertaken to identify suppliers to the business of products or materials in categories referred to in the U.S.A. Department of Labor 2022 List of Goods Produced by Child Labor or Forced Labor⁷. As a result, 26 suppliers were asked to confirm, and provide evidence, that none of their products supplied to Summerset are at risk of input from child and/or forced labour.

Of the 24 suppliers that responded, 88% provided evidence of their due diligence on modern slavery risks. This was in the form of assessing their own suppliers regarding source

⁷ https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2021/2022-TVPR-List-of-Goods-v3.pdf

and how they manufacture, supplier site visits and inspections, implementing supplier codes of conduct, and surveying their own supply chains for potential risks.

MANDATORY CRITERION FOUR:

Key FY23 actions

Summerset undertook actions to assess, address and manage the risks of modern slavery during the 2023 reporting period in the following areas.

Governance

In 2023, Summerset's suite of governance policies was updated to include a whistleblower policy specific to the Australian business setting. The whistleblower hotline is available to suppliers and Summerset staff, including to report concerns in relation to the potential for modern slavery practices. This is another important step in ensuring Summerset has a robust governance and oversight framework in relation to supply chain concerns.

Also in the governance space, the Modern Slavery Working Group continued its work throughout 2023 to manage modern slavery risks, under the oversight of the Procurement Steering Group and Summerset's Board. 2023 was the first year of our second three-year work plan (2023-2025). Additionally, 2023 saw the recruitment of a Governance & External Reporting Manager. This new position, a first for Summerset, has enabled and helped foster a broader and more business-wide engagement approach for modern slavery by providing dedicated resource and responsibility.

Supporting this increased focus on business-wide engagement, membership of the Modern Slavery Working Group expanded to include additional areas of the business that interact with suppliers and service providers directly rather than via procurement. This is a step in driving greater visibility of its entire supply chain as well as greater awareness and understanding within Summerset.

Summerset Board



Board Audit and Risk Committee



Executive Leadership team



Procurement Steering Group



Modern Slavery Working Group

Risk Management

In 2023, Summerset underwent a review and refresh of its Risk Management Policy and Enterprise Risk Framework. This helps ensure Summerset continues to adhere to best risk management practice, including in respect of modern slavery risks and other supply chain risks.

Its revised risk framework will help enhance Summerset's risk awareness, management, and control across the entire business. This growth in maturity and understanding will flow on to how Summerset collectively manages modern slavery risks.

Regulatory Change

Summerset continues to monitor both Australian and New Zealand legislation and legislative proposals or reviews. Anti Modern Slavery legislation in New Zealand is not currently in place. However, Summerset will ensure that we are fully compliant with any new requirements if enacted.

Summerset is also keeping a close eye on any proposed changes to Australian legislation following the publication of the Report of the

Statutory Review of the Modern Slavery Act 2018, which was released in 2023.

Procurement

Summerset's procurement processes have continued to build a strengthened focus on verification and oversight of suppliers' modern slavery risks.

- For example, template terms of business used by Summerset for contracting with recruitment agencies were tailored to address modern slavery risks and are being included in any new agreements and all contract renewals moving forward.
- The template contract for procuring goods and services for activities relating to ongoing maintenance to villages and care centres has been tailored for modern slavery risks.
- Summerset has continued to utilise a process for selecting and engaging construction contractors that enables a clearer opportunity (via the pre-let meeting) for the parties to discuss and agree on issues of strategic importance to the delivery of a successful project, which are then incorporated into the contract. This includes confirmations from the contractor in relation to the conditions of work for their employees.
- Template contracts used by Summerset in Australia, including the Request For Tenders and returnable schedules, incorporate Summerset's Modern Slavery Policy and require tenderers to identify how they are assessing and managing modern slavery risks.

Supplier mapping and due diligence

Summerset's procurement utilises many suppliers. Work continued in the 2023 reporting period to assist in capturing relevant information to assess modern slavery risks for suppliers.

In 2022, Summerset's top 200 suppliers by spend, and some other suppliers targeted based on a high-level risk assessment, were surveyed via a detailed questionnaire to assist Summerset to:

- identify and assess possible modern slavery risks in Summerset procurements;
- identify mitigation efforts to combat the risk of modern slavery in procurements; and
- foster collaboration between Summerset and suppliers to address these risks.

In addition, a review was undertaken to identify suppliers to the business of products or materials in categories referred to in the U.S.A. Department of Labor 2022 List of Goods Produced by Child Labor or Forced Labor⁸.

These suppliers were asked to submit:

- a short, signed statement confirming that none of their products supplied to Summerset are at risk of input from child and/or forced labour; and
- a summary of the due diligence undertaken to support their statement.

In response to the survey, and in the absence of a clear confirmation from a small number of suppliers, Summerset undertook activities to re-source the products these suppliers had previously supplied to Summerset.

A number of suppliers confirmed they had undertaken a review of their own sourcing practices and policies following receipt of the survey and had made changes to how they undertake their supplier due diligence going forward.

In 2023, Summerset has continued to develop its supply chain understanding and depth, targeting key areas, industries, and sectors that pose the greatest risk. This is supportive work and will lead into a further supplier survey (planned for FY24) and will be an opportunity to re-evaluate top suppliers by spend, new suppliers, and whether risk profiles of suppliers have changed since the 2022 review.

People and Culture

Summerset has embedded diversity data collection into its processes and induction packs include information for new staff recently arriving to New Zealand and holding visa

⁸ https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2021/2022-TVPR-List-of-Goods-v3.pdf



status, aimed at ensuring understanding of employment rights in New Zealand.

In 2023 Summerset undertook a review of its recruitment and induction policies and processes with a particular focus on Modern Slavery to ensure consistency with Summerset’s Modern Slavery Policy. Summerset has also updated its recruitment agency Terms of Business to include a Modern Slavery clause to ensure these external suppliers comply with its policy.

There is a mandatory modern slavery training module for all new staff, which is included as a standalone module in the Introduction to Summerset induction course. The course comprises an introduction to the issue of modern slavery, its relevance to procurement activity at Summerset including a guide to assessing risk, and an overview of Summerset’s supplier code of conduct and anti-modern slavery policy.

Awareness and Education

Summerset aims to raise awareness of the issue of modern slavery both internally and within Summerset’s network of suppliers and contractors.

Externally, Summerset hosted three contractor ‘partner’ events during August 2023, and a supplier briefing in November 2023, bringing Summerset construction and procurement staff together with approximately 400 external suppliers, contractors, sub-contractors and consultants. The events and briefing allowed the Summerset senior management team to update suppliers and contractors on new initiatives and expectations of suppliers to Summerset, including upcoming supplier and contractor due diligence activities and proposed anti modern slavery legislation in New Zealand.

MANDATORY CRITERION FIVE:

Measuring effectiveness

Summerset has a variety of measures currently in place to assess the effectiveness of the above actions

- The Modern Slavery Working Group meets regularly to discuss and monitor progress and effectiveness of initiatives and opportunities to continuously improve the way in which Summerset approaches modern slavery risks.
- The Procurement Steering Group meets every three months and receives regular updates on the above actions and how Summerset is tracking against them.

The Modern Slavery Working Group tracks delivery of certain key measures within the work plan. The principal areas of measurement are as follows.

- Number of staff (teams) that have received modern slavery risk awareness training.
- Number of suppliers that have been issued with the Supplier Code of Conduct.
- Number of suppliers that have been subject to further supplier due diligence.
- Number of contracts that have been amended via the addition of a modern slavery clause.

MANDATORY CRITERION SIX:

Consultation Process

Summerset recognises that each entity within the Summerset group has a role to play in addressing modern slavery risks and is committed to developing and maintaining a robust, group-wide response to modern slavery across all of Summerset's owned entities. All entities within the Summerset group are ultimately wholly owned by the reporting entity Summerset Group Holdings Limited.

The directors of Summerset Group Holdings Limited govern and set the overall strategy and direction of the business on a group wide basis. The subsidiaries share common directors, who are all senior managers of Summerset (or, in the case of Summerset LTI Trustee Limited, directors who sit on the Board of Summerset Group Holdings Limited).

MANDATORY CRITERION SEVEN:

Other relevant information

Supply chain disruption

2023 saw continued pressure on both domestic and international supply chains. This was primarily driven by continued high demand for certain goods and services, ongoing disruption due to businesses recovering from COVID-19, conflicts in Europe and more recently the Middle East. Supply chain issues include low global availability of shipping containers, increased shipping costs that lead to increased end costs, delays in processing of shipping, and ports and suppliers having reduced capacity.

Due to the ongoing supply chain disruption, Summerset has continued to experience significant changes to its supply chains. Summerset has needed to modify or establish new supply chains to source and ensure ongoing supply of products impacted by supply issues.

Summerset's ability to identify some of the risks of modern slavery practices in its operations and supply chains has been impacted by these changes to Summerset's suppliers. It is also possible that the economic and social effects of the pandemic, climate change and natural hazards, and other global influences, may have increased modern slavery risks in some areas.

Summerset will continue to plan and prepare to ensure it is well positioned to address modern slavery risks, including any new or emerging risks created by these influences.

SUMMERSET GROUP

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www.summerset.co.nz