

HENLEY PROPERTIES GROUP

MODERN SLAVERY
STATEMENT 2025

Henley▲





A modern living room with a large window, a beige sofa, a black coffee table, and a black TV stand. The room is bright and airy, with a large window on the left side. The sofa is positioned in front of the window, and the coffee table is in front of the sofa. The TV stand is on the right side of the room, and a large TV is mounted on the wall above it. The room has a clean, minimalist design.

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ABOUT THIS STATEMENT

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

The statement was prepared and submitted in accordance with the Modern Slavery Act 2018 (Cth) and relates to the calendar year ending 31 December 2025.

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

MANDATORY REPORTING CRITERIA IN THE MODERN SLAVERY ACT

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

MODERN SLAVERY ACT 2018 (CTH) CRITERIA	PAGE REFERENCE
Identify the reporting entity	2
Describe the reporting entity’s structure, operations and supply chains	6–8
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities it owns or controls	9
Describe the actions taken by the reporting entity and any entity it owns or controls, to assess and address those risks, including due diligence and remediation processes	10
Describe how the reporting entity assesses the effectiveness of such actions;	10
Describe the process of consultation with any entities that the reporting entity owns or controls	11
Details of approval by the principal governing body of the reporting entity	12

INTRODUCTION

We recognise that modern slavery is a complex and evolving global issue – one that requires ongoing collaboration and a commitment to continuous improvement amongst our trusted industry and supply partnerships. We take this responsibility seriously and are dedicated to understanding and addressing the potential impacts of our operations and supply chains on people and the planet.

This statement outlines the steps we have taken to strengthen our policies, processes and standards to reduce the risk of modern slavery within our business. It also sets out our commitments and practical steps as we continue to lead with integrity and promote responsible business practices.



ABOUT US

OUR HISTORY

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

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

We are proud to report that more than 62,000 families now call a Henley, Plantation or Edgewater home, their home.

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

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



PETER HAYES

Founder and
Managing Director



ROB BOWEN

Founder and Director



YASUHIRO ODAGANE

Managing Director
Sumitomo Forestry Australia

OUR VISION

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



WHY WE DO IT

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



HOW WE DO IT

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



WHAT WE DO

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



OUR OPERATION & STRUCTURE

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

We specialise in:

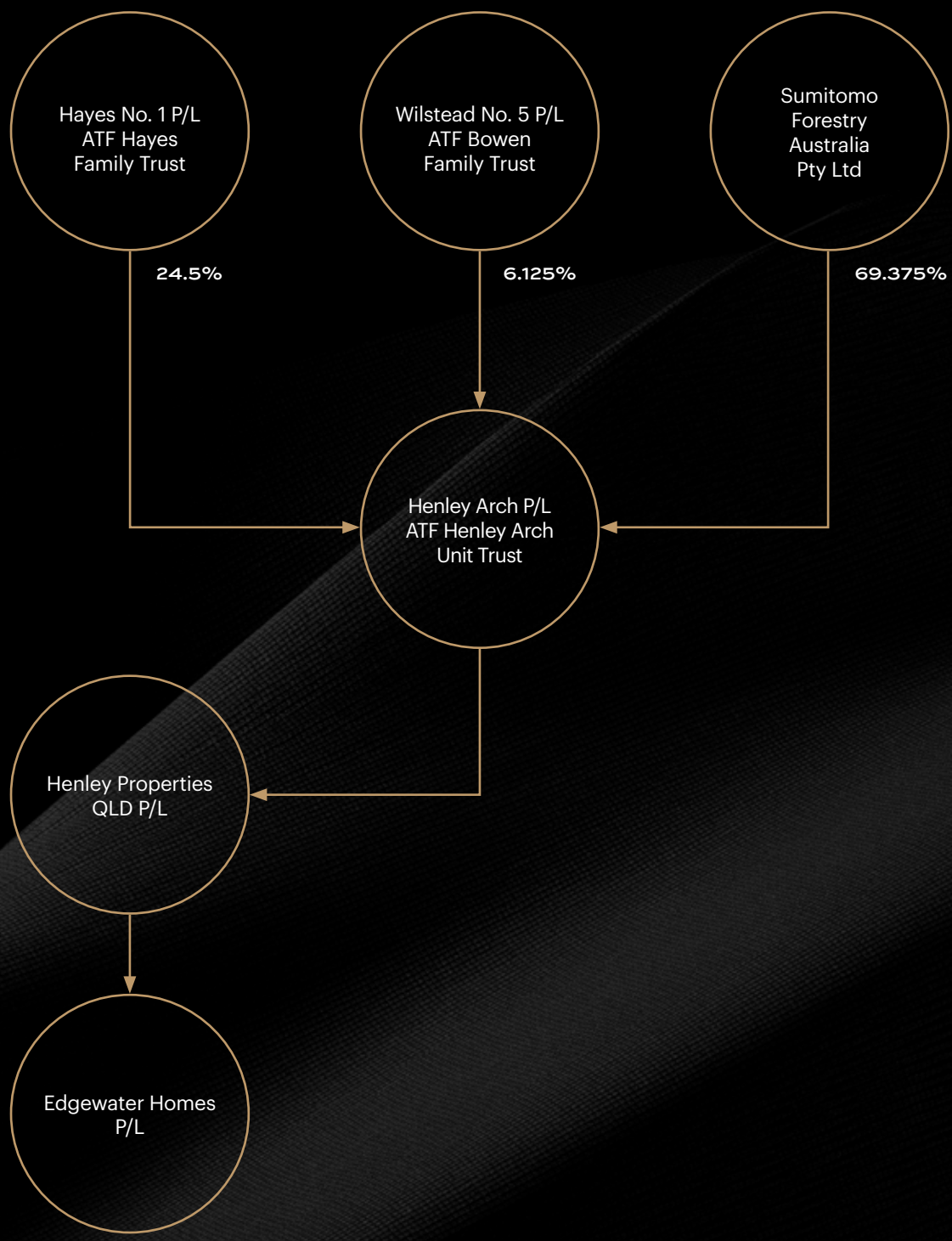
- The design and construction of new and completed homes
- Fixed price house and land packages
- Knockdown and rebuild solutions
- Developing new land communities
- Modular town home solutions
- Over 50s lifestyle communities

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

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



TABLE 1. COMPANY STRUCTURE AT 31 DECEMBER 2025



OUR SUPPLY CHAINS

Our supply chains cover various products and services including:

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

The procurement of our building materials is centrally managed to ensure consistency and oversight. While we prioritise partnerships with Australian suppliers, we recognise that some may source raw materials or labour from overseas. As part of our commitment to responsible sourcing, we are continually working to enhance our visibility and understanding of these extended supply chains, particularly where there may be elevated risks of modern slavery.



RISK IDENTIFICATION

DIRECT OPERATIONS

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

SUPPLY CHAIN

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

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

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

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

While subcontracting labour is a common and necessary practice in the Australian construction industry, it reduces our direct visibility over individual workers and their employment conditions. This reduced transparency presents a potential risk, particularly in ensuring that all workers have appropriate work rights and are treated fairly.

To ensure compliance, all suppliers and subcontractors must agree to our terms of engagement. These terms require adherence to local laws and regulations regarding how work is performed and paid, and how workers are treated. Additionally, subcontractors receive an information pack containing policies and procedures aligned to our modern slavery commitments.

RISK MANAGEMENT

REPORTING PERIOD ACTIONS

Taking ownership of the risks within our direct control is a core element of our commitment to responsible business practices. This includes maintaining strong internal policies and fostering a values-driven culture that promotes ethical behaviour and informed decision-making at every level of the organisation.

Our actions during the reporting period include:

- Modern Slavery Policy reviewed to ensure it empowers team members with the knowledge, confidence and support needed to identify and report potential risks or concerns.
- 100% of all team members participated in our annual professional development day to renew their understanding of compliance matters including modern slavery and human rights.
- Modern slavery is included as an agenda item at Executive Team Meetings.
- Ensuring modern slavery clauses are embedded in all new and renewed supplier and sub-contractor agreements, stating they must assess their manufacturing supply chain/s to ensure compliance with all Anti-Slavery Laws and provide training and education to their officers and workers.
- On-site visits conducted prior to engaging professional services from international contractors to enable enhanced oversight of working conditions, and may be undertaken periodically thereafter.
- Refreshed supplier and subcontractor onboarding packs to include revised policies and strengthened requirements aligned with our modern slavery commitments.
- Strengthened subcontractor onboarding process, supported by dedicated HSE administrative resource, to ensure all trades are registered and fully compliant prior to engagement. Non-compliant subcontractors are not scheduled for work until requirements are met.
- Strengthened site audit processes to ensure all workers, including subcontractors, are properly inducted.
- Updated our Whistleblower Protection Policy to include specific reference to the disclosure of modern slavery concerns.

PLANNED ACTIONS/NEXT STEPS

- Continue to raise awareness of the different types of modern slavery among suppliers through regular dialogue and clear guidelines and policies;
- Strengthen the induction process for subcontractors and suppliers by requiring a formal declaration confirming the work rights of each individual worker.

EFFECTIVENESS OF ACTIONS

We are committed to continually strengthening our approach to addressing modern slavery across our operations and supply chain. Oversight is supported through regular reporting to the Executive team, with three formal updates provided each year.

We assess the effectiveness of our actions by tracking key indicators across our operations, including supplier due diligence, subcontractor onboarding compliance, employee survey feedback, and employee training completion — including assessment of employees' understanding of Modern Slavery risks and their ability to identify and respond to concerns.

We benchmark our modern slavery policies and practices against industry standards annually to identify areas for improvement and validate the effectiveness of our approach.

We also monitor grievance channels and work with suppliers to respond to any identified risks. No modern slavery concerns were reported through these channels during the reporting period.

These measures help us understand how consistently our controls are being applied and where further focus is needed.

We understand that identifying and addressing modern slavery risks within our operations and supply chain is a continuous journey. We are committed to refining our approach over time, setting clear annual objectives that enable us to measure progress, evaluate the impact of our actions, and guide future improvements.

GROUP CONSULTATION PROCESS

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

Our Executive team is responsible for achieving action plans and implementing initiatives impacting their specific suppliers. They are actively involved in the activities and outcomes detailed in this Statement, including all efforts to eliminate modern slavery in our supply chain.

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

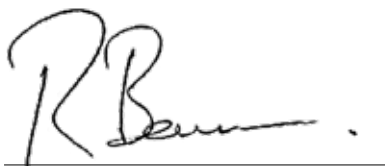


OUR COMMITMENT

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

APPROVAL

This statement was approved by the board of Henley Arch Pty Ltd on 24 June 2026

A handwritten signature in black ink, appearing to read 'Rob Bowen', is written over a thin horizontal line.

Rob Bowen
Director







IMAGINE.
NOW LIVE IT.

Henley▲