

690 WPH Pty Ltd - Modern Slavery Statement for year ending 31 December 2022

About this Statement

1. This Modern Slavery Statement (**Statement**) covers the activities of 690 WPH Pty Ltd (ACN 614 450 412) (**690 WPH**) over the calendar year ending 31 December 2022 (**Reporting Period**) and has been prepared to comply with the requirements of the *Modern Slavery Act 2018* (Cth) (**Act**).
2. The reporting entity is 690 WPH.
3. 690 WPH's registered office is. C/-HLB Mann Judd (Melbourne) Level 9 550 Bourke St Melbourne VIC 3000
4. This Statement has been prepared to meet the mandatory criteria as outlined in the Act.

Our Structure and Operations

Structure

5. 690 WPH forms part of the Dahua Group of companies (**Dahua Group**) and is jointly owned by three entities:
 - a. Da Hua Group Hong Kong Investments Limited - 60%
 - b. Vast Great Investment Limited – 20%
 - c. Dacland Lochaven West Investment Pty Ltd (A.C.N. 614 588 135) – 20%
6. 690 WPH does not own or control any other entity.
7. As at the date of making this Statement, 690 WPH does not employ any employees, as it is a special-purpose vehicle (SPV) entity.

Operations

8. The Dahua Group is a top tier property development and real estate company which originated in China and expanded to Australia in 2014. In Australia, the Dahua Group has successfully completed projects in both Sydney, New South Wales and Melbourne, Victoria.
9. 690 WPH's main operations encompass investment and property development. The main business activities for the year ending 31 December 2022 was changed to land held for resale.

Our Supply Chains

10. 690 WPH is committed to eliminating the potential for modern slavery practices in its operations and supply chain. Similarly, it is dedicated to ensuring that the risks of modern slavery practices within 690 WPH's business operations are addressed in accordance with the principles set out in the Act.
11. Our supply chain centres around acquiring land parcels suited for residential and commercial building projects. We source and purchase land lots directly from private owners within our target growth regions and corridors. This comprises the major component of our direct supply chain. Our direct supply chain also involves services from various consultants,

real estates agents, surveyor and legal practitioners to facilitate the acquisition and re-selling of the land lots.

Indirectly, our extended supply chain includes the materials, services and activities involved in developing acquired land and constructing property infrastructure. However, we have limited influence or direct oversight over these extended partners and subcontractors. Our core business exclusively revolves around securing and optimizing land assets to maximize long-term potential value through development.

We do not have a direct international supply chain as all operations are focused within select areas of our local geographies. Procurement of materials, labour and other resources all occur regionally based on specific project and site requirements. While standards and policies apply to our choice of extended supply chain partners, we do not directly manage or coordinate these parties continuously or at scale. Our model is based on selecting the most suitable subcontractors and suppliers within our current areas of land ownership to facilitate residential construction and infrastructure.

Overall, our approach is locally-centred, focusing on establishing a supply chain specific to each new land parcel we obtain based on what will optimize the development of that site. Partners and subcontractors may change from project to project based on location, available resources and housing demands in that region. While risks still exist within our extended supply chain, our role is focused primarily on assembling the most effective, responsible supply chain for each distinct local area of our operations.

Identifying Risks of Modern Slavery Practices

12. We appreciate that certain geographical locations and industries in our supply chain present greater risks of modern slavery practices. We continuously review these risks to prioritise our efforts where necessary.
13. 690 WPH acknowledges and recognises the following modern slavery risks as most relevant in our local and international supply chains:
 - 13.1 Forced or unpaid labour;
 - 13.2 Unsafe working conditions or labour;
 - 13.3 Debt bondage;
 - 13.4 Human trafficking; and
 - 13.5 Servitude.
14. The areas of business that are most susceptible to modern slavery risks largely relate to our indirect overseas supply chains and the following high-risk categories:
 - 14.1 Temporary Labour Contracts in Construction: for example, in relation to any unpaid labour or unsafe working conditions regarding the engagement of workers by our sub-contractors; and
 - 14.2 Overseas suppliers: for example, suppliers of steel, timber, concrete, stormwater pipes etc.

Actions Taken to Address the Risks

15. To manage modern slavery risks, we have developed methodology for identifying, mitigating and remediating risks, as well as ongoing assessment of the effectiveness of such actions.

16. This methodology / due diligence process includes identifying, preventing, mitigating and accounting for how the business addresses its human rights risks, such as modern slavery. This process involves:
- 16.1 risk identification and assessment informed by mapping our operations and supply chain and identifying and prioritising the most severe risks;
 - 16.2 implementing risk management measures (including training as set out below); and
 - 16.3 monitoring the risk management measures taken.
17. We set out below the specific actions taken to address the high-risk categories set out above.

Policies, governance and training

18. Dahua Group has a robust corporate governance framework in place, and a comprehensive set of policies and procedures which outline our values, ways of working and expectations of employees and suppliers. These policies ensure that Dahua Group's employees and suppliers understand our expectations of standards and behaviour. These policies are adopted by all Dahua Group subsidiaries including 690 WPH.
19. 690 WPH has the following policies in place that assist in mitigating risks regarding modern slavery, including:
- 19.1 Modern Slavery Policy;
 - 19.2 Anti Bribery and Corruption Policy;
 - 19.3 Prevention of Discrimination, Bullying and Harassment Policy; and
 - 19.4 Work, Health and Safety Policy.
20. We have also created avenues for anonymous reporting of any suspected modern slavery activities relating to 690 WPH.
21. 690 WPH is working towards incorporating Modern Slavery related questions into its onboarding questionnaires with respect to suppliers and consultants.
22. We have also engaged KPMG to assist in implementing a Modern Slavery Protocol.

Contractor Agreements

23. As set out above, 690 WPH engages contractors to assist our Land acquisition and re-sell transactions. These contractors typically act as single contracting entity. Our standard contractor agreements expressly require:
- 23.1 any consultants and contractors to provide a statutory declaration to confirm that any subcontractors engaged are paid appropriately and regularly;
 - 23.2 any consultants and contractors to comply with 690 WPH's Modern Slavery Policy (referred to at paragraph 19.1 above); and
 - 23.3 any consultants and contractors to comply with applicable Australian work, health and safety legislation.

Assessing and Measuring the Effectiveness of Actions Taken

24. To date, our business focus has been to establish due diligence systems to identify, assess and address any risks of modern slavery practices.
25. With the assistance of external specialists, 690 WPH has committed to undertaking a detailed risk assessment of its supply chain in FY22, and will continue to develop that risk assessment to assist with identifying risks associated with modern slavery.
26. We engage in the following processes which are aimed at assessing the effectiveness of our actions taken to date in relation to modern slavery:
- 26.1 690 WPH now conducts an annual review of its response to modern slavery; and
- 26.2 690 WPH collaborates with industry body on best practice strategies in detecting and minimising modern slavery risk.

Future Commitments

27. Our approach to measuring the effectiveness of how we assess and manage modern slavery-related issues continues to evolve.
28. Over the next reporting period, we will continue to assess ways to reduce the risks of modern slavery practices. Some steps to be taken include the following:
- 28.1 Continuing to monitor, assess and improve supplier performance;
- 28.2 Engaging with internal and external stakeholders on best practice guidelines;
- 28.3 Implementing further training to HR team to implement modern slavery awareness for the wider business;
- 28.4 Restructuring our staff induction program (for new and existing staff members) to include an overview of modern slavery grievance mechanisms; and
- 28.5 Amending 690 WPH's standard consultancy and contractor agreements with suppliers to ensure compliance with modern slavery obligations including Dahua's Modern Slavery Policy.
29. We recognise that transparent and accessible grievance mechanisms to support stakeholders is central to our ongoing management of modern slavery-related issues.

This Statement is made pursuant to section 13(1) of the Act. This Statement has been approved by the principal governing body of 690 WPH, being its Board of Directors.



Ken Fan
Director
690 WPH Pty Ltd
6 June 2023