

# Henley Properties Group

Modern Slavery Statement  
Financial Year 2021

Henley 

# Introduction

This annual 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) (the "Henley Trust") in accordance with the Modern Slavery Act 2018 (Cth) and it relates to the financial year ending 31 December 2021.

For purposes of this statement, "Henley", consists of the Henley Arch Unit Trust and its controlled subsidiaries as illustrated on page 2.

The purpose of this statement is to outline the steps taken to ensure that the Henley Properties Group (Henley) and its controlled entities has a comprehensive framework and governance process in place to minimise the risk of modern slavery in our business operations and supply chain.

Henley acknowledges that slavery can occur in many forms including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting.

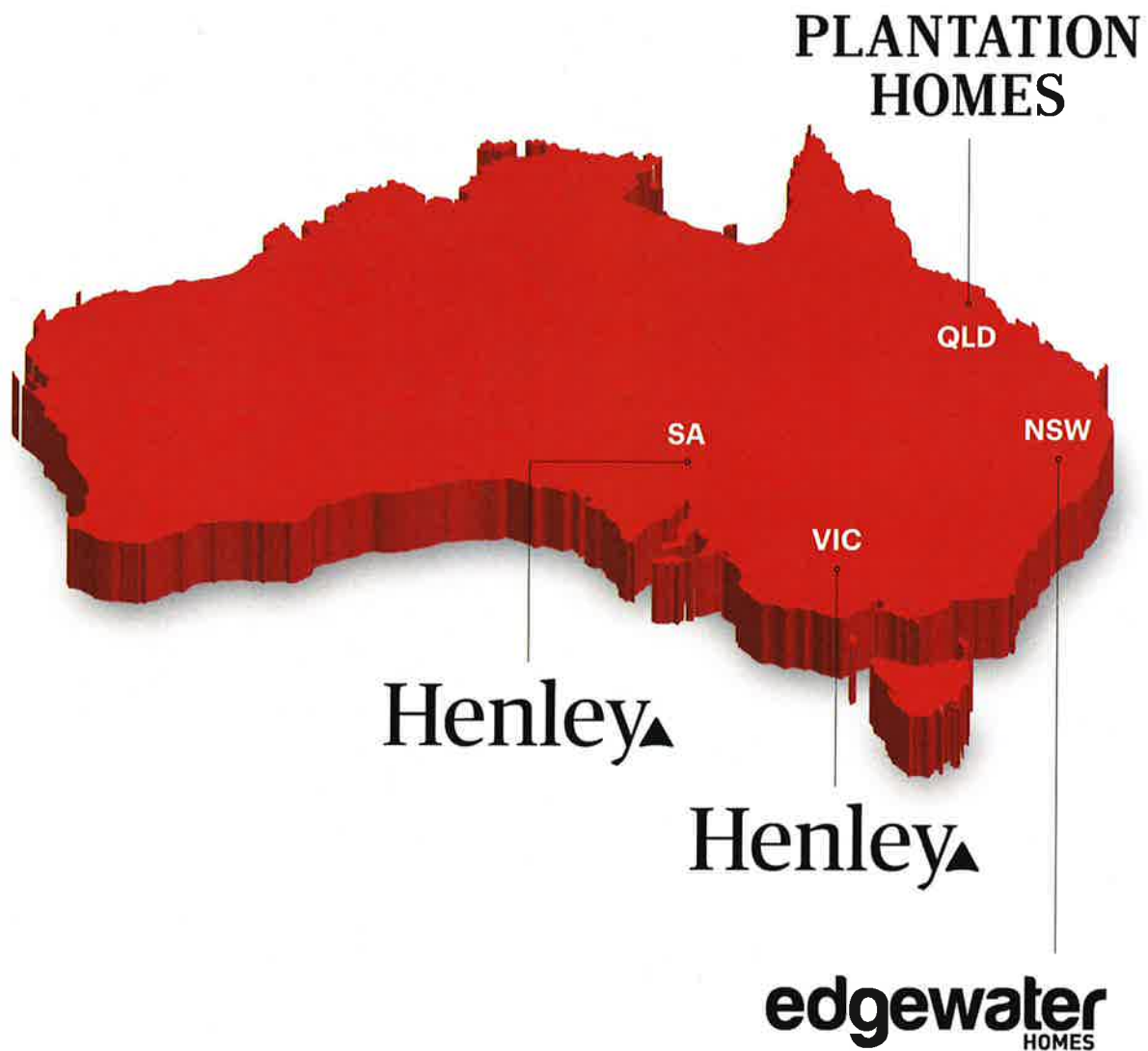
Henley is committed to operating responsibly in partnership with its supply chain to prevent any form of slavery in its operations and supply chain.



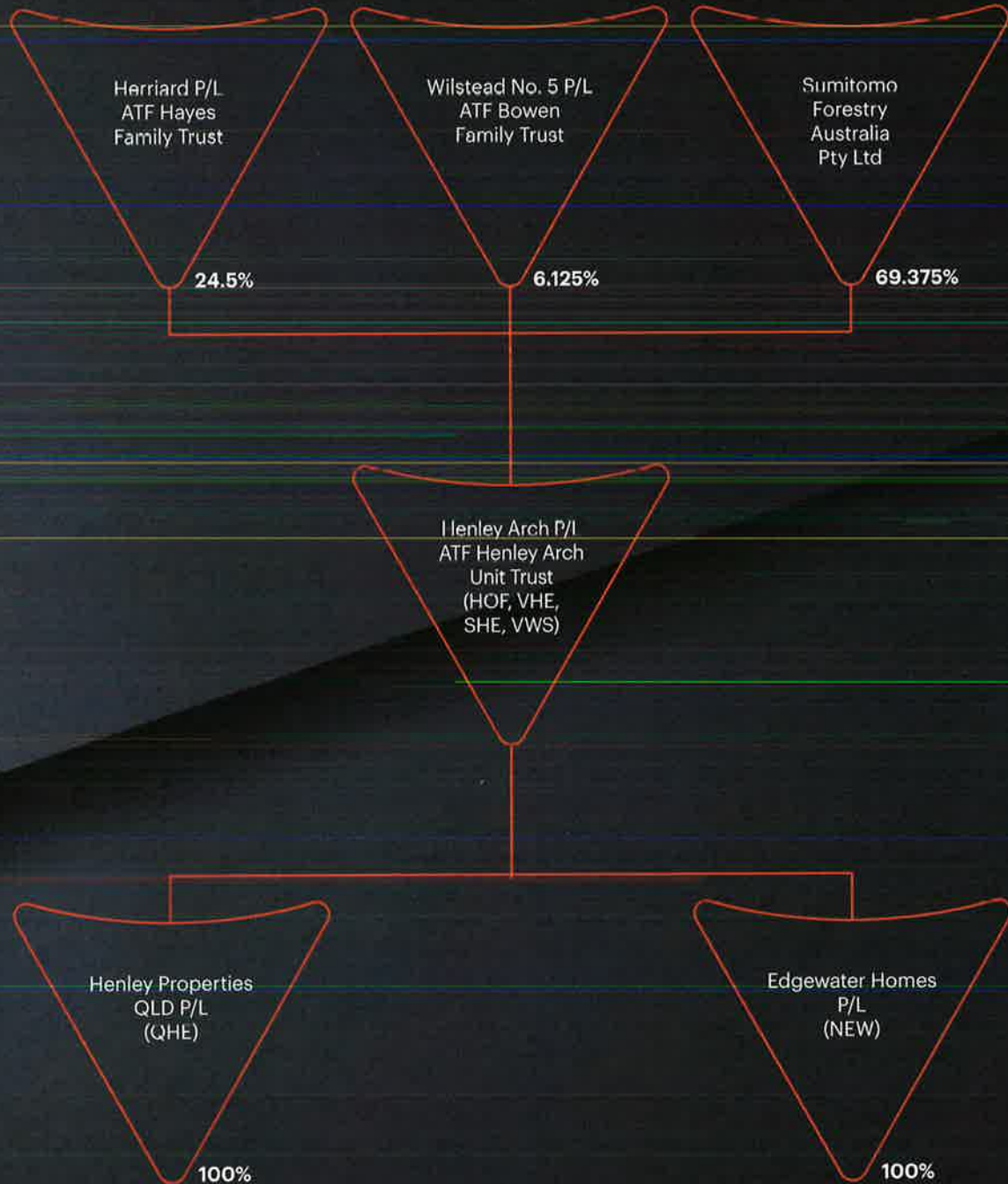
# Our Company & Business Overview

Henley started in Victoria and by the late 1990s had quickly grown to become one of Australia's leading residential builders. Henley remains one of the largest and most prominent Australian homebuilder's with operations in Queensland, New South Wales, Victoria and South Australia.

Henley is based in Victoria and its core business is the sale and construction of residential homes and townhouses and the development of land for residential construction purposes.



## Company Structure at 31 December 2021



**As of 31 December 2021, Henley had 610 employees and more than 2,250 active suppliers and contractors.**



Henley’s major shareholder is Sumitomo Forestry Australia Pty Ltd, which is wholly owned by a Japanese listed company, Sumitomo Forestry Co., Ltd (Sumitomo Forestry).

Sumitomo Forestry is an advocate of Human Rights and a signatory of the 10 principles of the United Nations Global Compact. As a controlled subsidiary of Sumitomo Forestry, Henley shares the same beliefs regarding the importance and protection of Human Rights.

## Governance

Henley is governed by a Board comprising Peter Hayes (on behalf of the Hayes Family Trust), Robert Bowen (on behalf of the Bowen Family Trust) and employees of Sumitomo Forestry Australia. Reporting to the Board is the Chief Executive Officer of Henley who has a senior group of leaders in place to execute the policies of the Board and manage the business.

## Supply Chain

Henley sources various building materials from Australian suppliers which may source the materials or components from their overseas suppliers. Henley also procure professional services from suppliers based in Australia as well as overseas. In most instances, overall responsibility for the procurement of building supplies is centrally controlled.



# Risk

## Risk Identification

**Henley's direct operations, employees and contractors:** the employees of Henley represent a low risk in relation to modern slavery as all reside in Australia with the terms of employment governed by all relevant fair work legislation. In daily communication with contractors and sub-contractors including further sub-contractors at construction sites, Henley has not been aware of the existence of any forms of modern slavery in its operation, as such the risk among contracting relationships is also low..

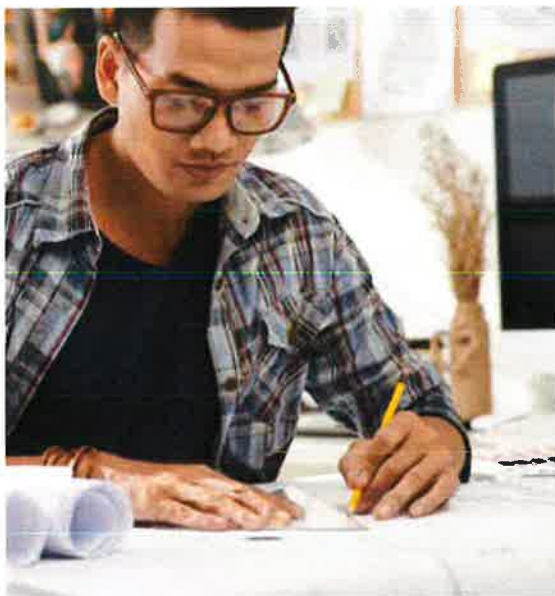
**Building materials:** Building materials are sourced from local and national Australian suppliers which may source materials or components from their overseas supply chains. Henley is not advised of specifically how they procure the labour in the manufacturing process, however takes reliance on suppliers individual Modern Slavery Statements that protective measures are in place.

**Professional Services:** Henley sources professional drafting, estimating and design services from offshore suppliers. As at the 31 December 2021, these suppliers include businesses located in China, Vietnam and Thailand. Henley also takes reliance on individual Modern Slavery Statements from the providers of professional services that protective measures are in place.

## Risk Management

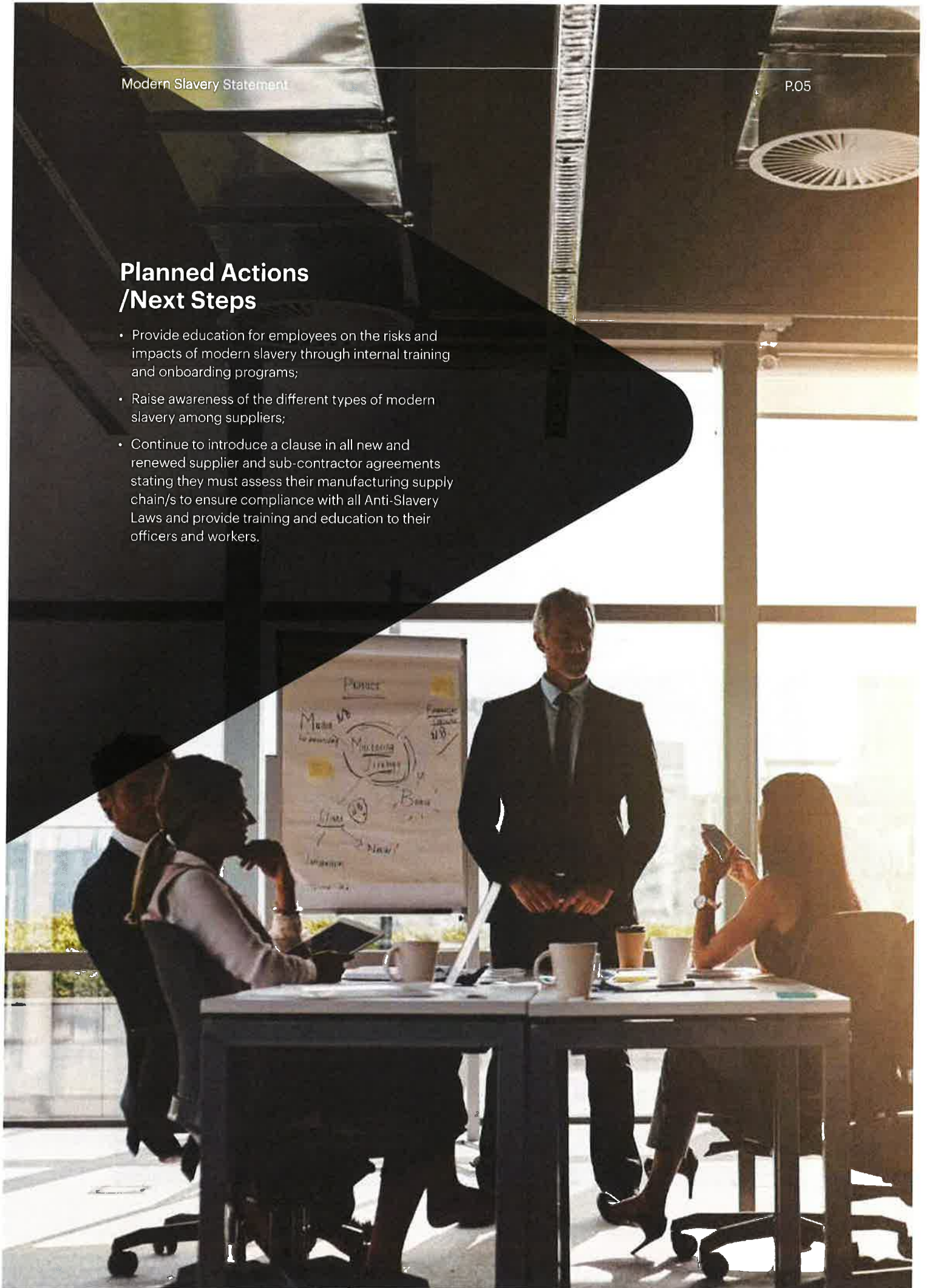
To manage the risks of modern slavery in its supply chain, Henley has implemented the following actions during the reporting period and/or prior to the date of this statement;

- Published a Modern Slavery Policy. The Modern Slavery Policy specifically addresses the need to be vigilant on modern slavery issues.
- Included Modern Slavery compliance as an agenda item at Executive Team Meetings.
- Introduced a clause 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.
- Obtained and reviewed the Modern Slavery Statements of Henley's tier-one Suppliers
- Provided practical training to Henley's Officers, Executive Team, Managers and Team Leaders on Modern Slavery compliance and practices.



## Planned Actions /Next Steps

- Provide education for employees on the risks and impacts of modern slavery through internal training and onboarding programs;
- Raise awareness of the different types of modern slavery among suppliers;
- Continue to introduce a clause 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.



# Assessment of Effectiveness of Actions

# Group Consultation Process

Henley, under the direction of the Executive Team, review the completion and outcomes of assigned actions throughout the year and monitor the overall effectiveness of the outcomes each year ahead of the annual Modern Slavery Statement filing deadline.

This statement has been prepared after consultation with members of the Henley Properties Group responsible for Legal Counsel, Procurement, Health, Safety and Compliance and Human Resources.

All members of the Henley Properties Group Executive Team have accountability for execution of the action plans and standard actions relating to their respective suppliers and will be kept apprised of the activities and outcomes outlined in this Statement.



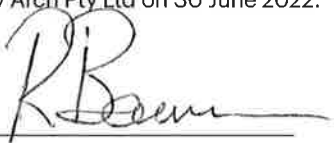


# Henley's Commitment

Henley recognises the importance of transparency in its supply chains to avoid the exploitation and enslavement of people around the world. Henley is committed to ensuring businesses do not profit from the mistreatment of others and look forward to ongoing compliance in its supply chains.

## Approval

This statement was approved by the board of Henley Arch Pty Ltd on 30 June 2022.

A handwritten signature in black ink, appearing to read 'R. Beem', is written over a horizontal line.

Director

