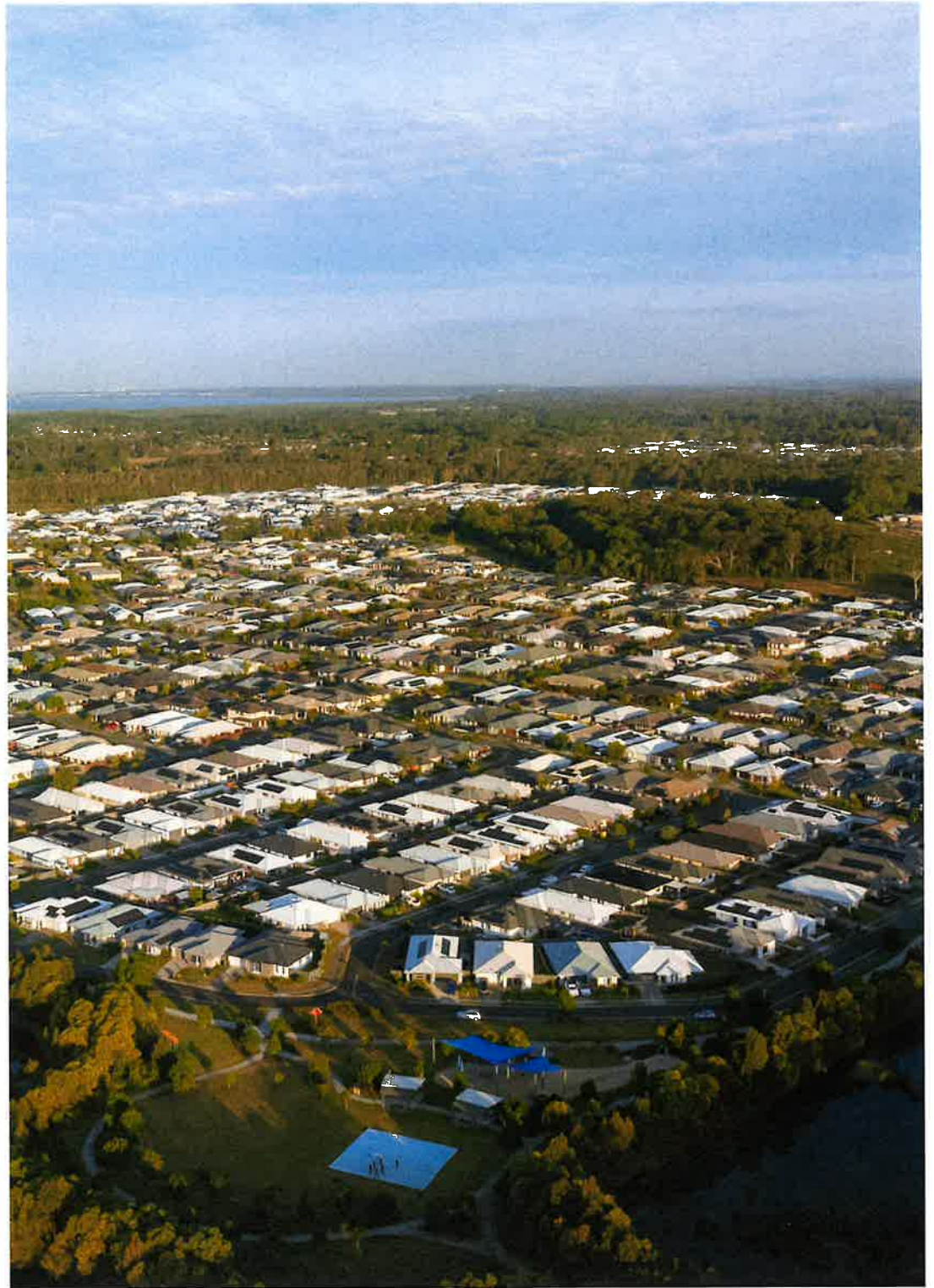




# North Harbour

## Modern Slavery Statement

For the Year Ended 30 June 2025



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# About this Statement

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Our Modern Slavery Statement is published in accordance with the Modern Slavery Act 2018 (Act). This Statement encompasses the consolidation of North Harbour Holdings Pty Ltd and its controlled entities (referred to as 'North Harbour' in this Statement).

The Act requires each Modern Slavery Statement to address 7 mandatory criteria of which all are addressed in this Statement.

In preparing this Statement, we actively engaged and consulted with all the relevant business units that form part of North Harbour. This was undertaken through:

- 1) Collaboration with all business units and entities to provide an overview of the Modern Slavery Act's reporting requirements and providing information regarding the actions we intend to take to address these requirements.
- 2) Providing a Modern Slavery Policy and Whistleblower Policy training sessions to all staff at North Harbour.



# 1. Reporting Entity

North Harbour is a leading real estate developer in South East Queensland with its key project being the North Harbour precinct located in Burpengary East. The project features a world class master planned community featuring a residential community, mixed industry business park, retail and commercial precinct, and marina with an industry precinct.

North Harbour Holdings Pty Ltd is a reporting entity for the purposes of the Modern Slavery Act.

For this statement's reporting purposes, the North Harbour entities that are captured by this statement are outlined in Annexure A.

The registered office of North Harbour is Unit 2 11 Parkview Street, Milton QLD 4064 and the North Harbour project is located at Burpengary East, QLD 4505.





## 2. Structure, Operations & Supply Chain

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### Structure & Operations

North Harbour's strategy is to develop master planned communities across South East Queensland with the North Harbour precinct being the only project currently under development.

The company has a total of 21 staff (permanent and contractors) all located in Brisbane across the Milton Head Office and the North Harbour Sales and Information Centre located in Burpengary East.



## 2. Structure, Operations & Supply Chain (cont')

### Supply Chain

North Harbour works with a variety of suppliers. North Harbour's supply chains across various stages of planning, approval, development, marketing, sales and administrative processes include:

Risk Area	Focus Area	Examples
Operations	Land Development	Civil, building and landscaping contractors (earthworks, water, gas, drainage, sewer, power, telecoms, roads, footpaths, parks etc), signage contractors, marketing, professional advisors (planners, engineers, surveyors, architects), legal, other independent consultants and contractors.
Administration	Office Premises IT Related Other Consultants	Landlords, leasing agents, auditors, tax agents, legal, other independent consultants and contractors.
People (Internal)	Employed or Contract Staff	Full-time staff, part-time staff and contractors.

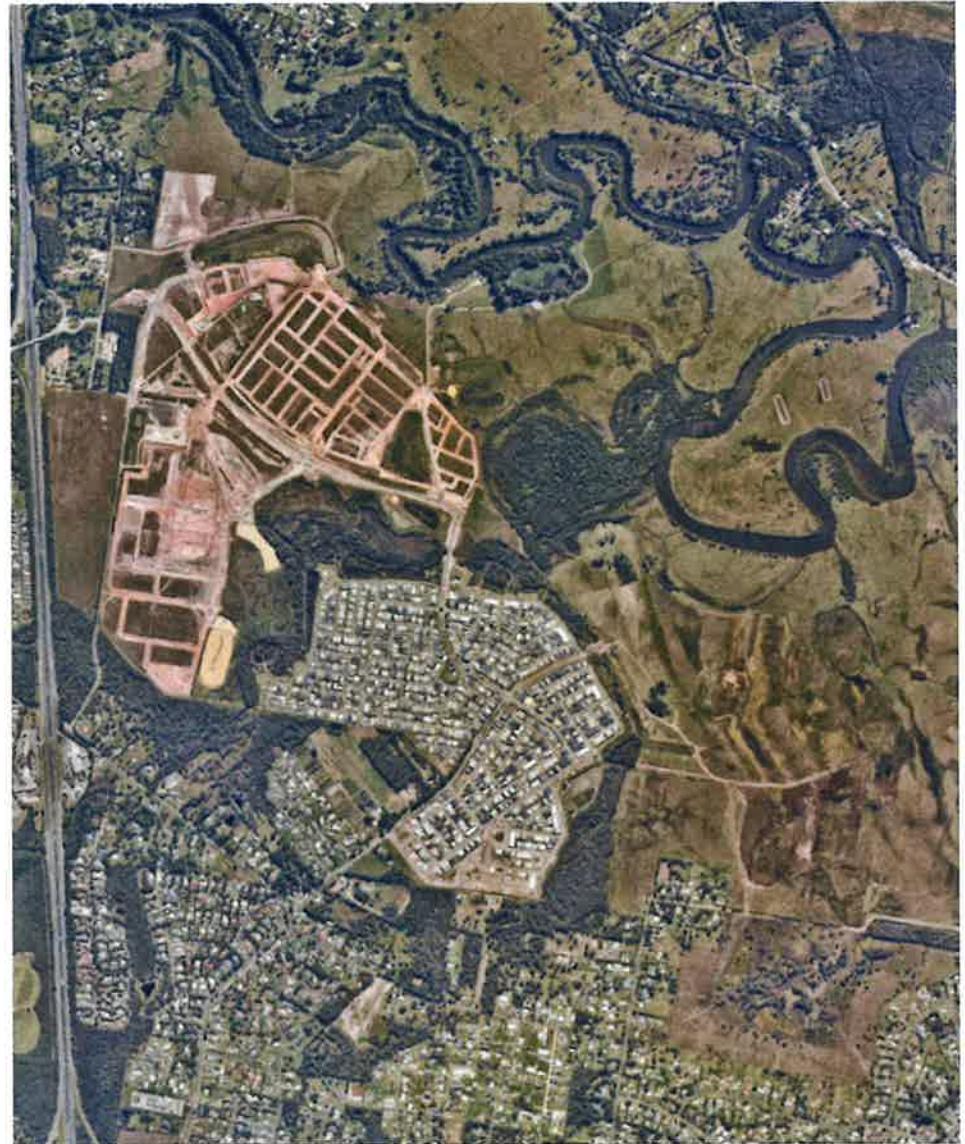
The largest focus in Modern Slavery for North Harbour is in the building and construction services areas of the business. North Harbour generates the majority of income through the sale of land to customers.

While North Harbour does not undertake the physical building and development of houses, townhouses and commercial/industrial buildings, it engages appropriately qualified and experienced civil, electrical and landscape contractors to assist with developing its landholdings.

## 2. Structure, Operations & Supply Chain (cont')

These civil and landscape contractors and builders then engage a range of sub-contractors to provide specific services in respect to the delivery of the overall goods and services at North Harbour.

We recognise that these civil and landscape contractors, builders and sub-contractors (all suppliers to North Harbour) may purchase products and/or provide services on our behalf from their own sub-suppliers in our extended supply chain.





### 3. Modern Slavery Risks

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Modern Slavery can include human trafficking, slavery, servitude, forced labour, debt bondage, deceptive recruiting for labour or services, forced marriage and child labour.

North Harbour operates solely in Australia and the nature of its operations generally doesn't foster an environment where slavery is condoned. Accordingly, North Harbour considers that there is a negligible risk of North Harbour directly causing Modern Slavery practices.

Therefore, North Harbour's risk management focus is primarily focused on where it may inadvertently contribute to or be inadvertently indirectly linked to Modern Slavery through a supplier or contractor.

### 3. Modern Slavery Risks (cont')

The table below highlights the key Modern Slavery-related risks across North Harbour's supply chains.

Risk Area	Key Modern Slavery Risk	Mitigation
Operations	Labour and services outsourced by contractors and sub-contractors	WHS inspections, site visits, supplier code of conduct, engagement with contractors and subcontractors
	Materials sourced from certain overseas jurisdictions by contractors and sub-contractors	Supplier code of conduct, engagement with contractors and subcontractors (pre-ordering of materials)
Administration	Labour and services outsourced by contractors and sub-contractors	Supplier code of conduct, engagement with contractors and subcontractors
	Materials sourced from certain overseas jurisdictions by contractors and sub-contractors	
People (Internal)	Not identifying instances of Modern Slavery	Training

The processes and systems adopted by North Harbour to identify, assess and address the above risks are outlined in Section 4 of this Statement.



## 4. Assessing & Addressing Risks

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The Board of North Harbour Holdings Pty Ltd (Board) is responsible for overseeing the management of North Harbour's Modern Slavery risk.

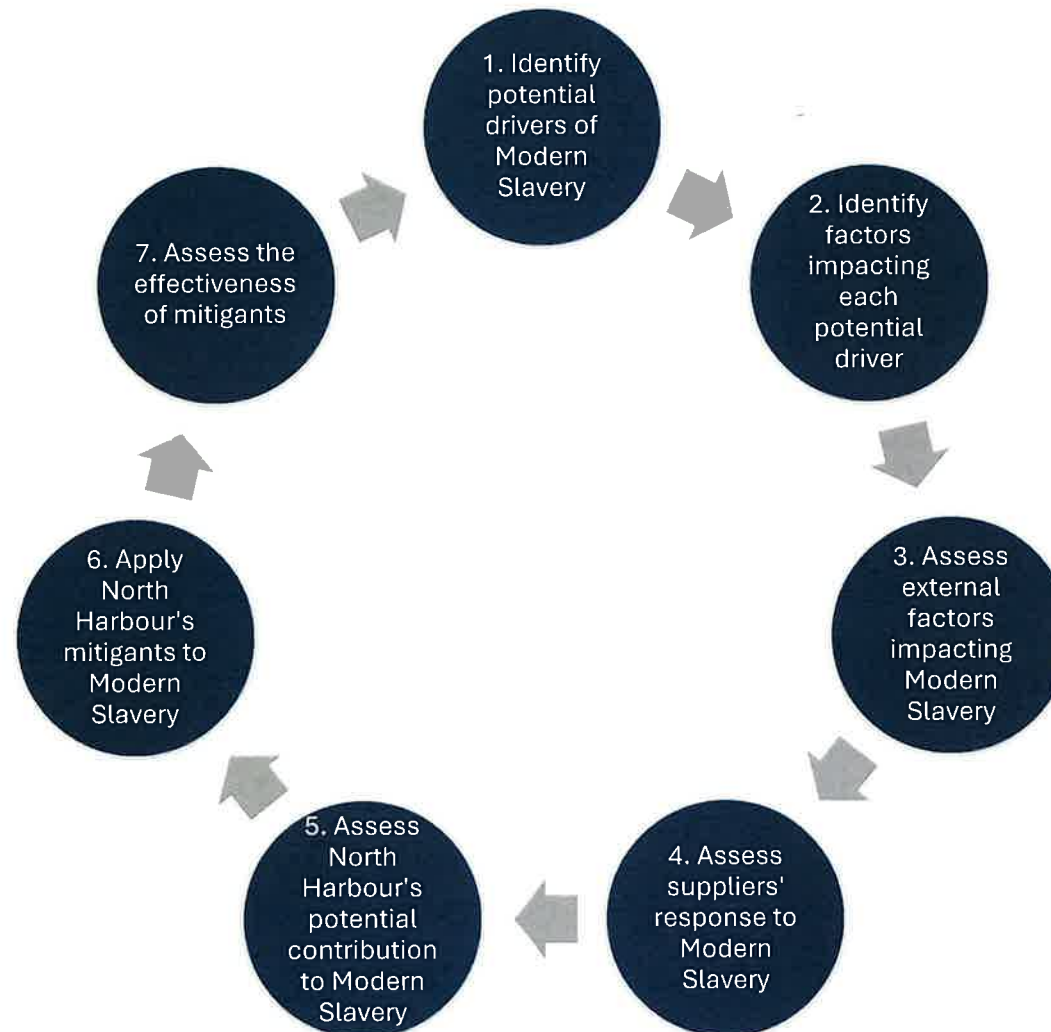
North Harbour has established a Modern Slavery Working Group, comprising the Chief Financial Officer, Project Director, Operations Manager and Fund Manager. The Working Group's objectives include:

- gaining an understanding of the risk of Modern Slavery occurring within North Harbour's operations and supply chains;
- supporting staff with the commencement of dialogue with its major suppliers in respect to their Modern Slavery risks;
- development of a plan to implement processes to mitigate against the risks of Modern Slavery within North Harbour's operations and supply chains;
- role modelling best practice in Modern Slavery risk mitigation;
- ensuring relevant operational staff are aware of North Harbour's expectations in relation to mitigating the risk of Modern Slavery occurring in North Harbour's supply chain; and
- ensuring suppliers are systematically onboarded.



## 4. Assessing & Addressing Risks (cont')

The process adopted by the Modern Slavery Working Group to identify, assess and address Modern Slavery risks across North Harbour's operations and supply chains can be summarised as follows:



## 5. Assessing Effectiveness of Risk Mitigation

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North Harbour's processes and procedures in response to Modern Slavery risks continue to develop in order to enhance its understanding and mitigation against the risk of Modern Slavery practices occurring within its operations and supply chains.

North Harbour assesses the effectiveness of its actions through:

- discussions with peers and suppliers;
- collaboration/discussion with other reporting entities in their response to the reduction/elimination of Modern Slavery;
- periodic reviews of North Harbour Modern Slavery and Whistleblower Policies; and
- annual training sessions on North Harbour Modern Slavery and Whistleblower Policies.

## 6. Consultation with North Harbour

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This statement is made pursuant to the Act and constitutes the North Harbour Modern Slavery statement in respect of the 30 June 2025 financial year and is approved by the Board of Directors of North Harbour Holdings Pty Ltd.

Each Director of the related North Harbour entities listed in Annexure A has been consulted with in preparing this Modern Slavery Statement. The parent company of the North Harbour Group is North Harbour Holdings Pty Ltd which is the Reporting Entity for this statement.



## 7. Other Relevant Information

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All North Harbour staff have a responsibility to prevent, identify and report any concerns they may have in relation to Modern Slavery within North Harbour operations and supply chains. Such concerns are to be reported to the appropriate manager or otherwise in accordance with North Harbour Modern Slavery Policy or Whistleblower Policy.

All reports of concerns relating to Modern Slavery will be treated with sensitivity, confidentiality and will be taken seriously.

# Board Approval

Approved by North Harbour Holdings Pty Ltd Board of Directors, dated 13<sup>th</sup> November 2025.

Signed in accordance with the requirements of the Commonwealth Modern Slavery Act 2018.



**Malcolm Hall Brown**

Chairman

13<sup>th</sup> November 2025

# Annexure A

Entities covered by this statement include the following parent and consolidated entities:

Entity Name	ACN
North Harbour Holdings Pty Ltd (Parent)	101 569 457
Burpengary Premier Farming Pty Ltd	652 780 053
North Harbour Homes Pty Ltd	655 424 178
D Brook Pty Ltd	668 820 317
NHH Properties Pty Ltd	678 114 684
North Harbour Funds Management Pty Ltd	678 116 179
NHH Management Pty Ltd	678 116 348
NHH Retail Pty Ltd	678 115 154
NHH Marina Pty Ltd	678 115 565
NHH Industrial Pty Ltd	678 115 707
NHH Projects Pty Ltd	678 114 960