

# MODERN SLAVERY STATEMENT 2020

## 1 Introduction

1.1 This Modern Slavery Statement (**Statement**) is made pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**) by the following companies:

- Kajima Australia Pty Ltd (**KA**) (ACN 604 351 966);
- Kajima Construction Australia Pty Ltd (**KCA**) (ACN 604 354 798); and
- Kajima Cockram International Pty Ltd (**KCI**) (ACN 617 741 018),  
(together, the Reporting Entities, KA group, we, us and our).

This Statement describes the operations and supply chains of the Reporting Entities, the modern slavery risks therein and describes the steps taken by the Reporting Entities to assess and address those risks during the year ending 31 December 2020 (**Reporting Period**).

## 2 Our structure, operations and supply chains

### 2.1 Structure

Kajima Australia Pty Ltd is a proprietary company registered in Australia. Its principal place of business is 110 Cubitt Street Cremorne VIC 3121.

The ultimate parent company of the Reporting Entities is Kajima Corporation which is a Japanese publicly listed construction company headquartered in Tokyo. Where this Statement refers to “Kajima” it is a reference to Kajima Corporation and its direct and indirect subsidiaries.

Kajima is made up of a number of legal entities that provide construction, real estate development and other services to third parties.

KA is the highest entity owned by Kajima operating in Australia. It is Kajima’s Oceania holding company. KCA is a construction holding company wholly owned by KA. Kajima Icon Holdings Pty Ltd (**KIH**)<sup>1</sup> (ACN 617 584 175) and KCI are wholly owned subsidiaries of KCA.

KCI is a KA’s Asia/America holding company and has majority ownership of the following foreign subsidiaries in China, USA, Hong Kong, Thailand and India:

SCL wholly owns Scenario Cockram (China) Limited and Scenario Cockram (Thailand) Limited. SCL also wholly owns Scenario Cockram USA Inc.

<b>KCI subsidiaries</b>	<b>Location</b>	<b>Operations</b>
Cockram Projects (Shanghai) Construction & Engineering Co Ltd	China	Construction management services
Cockram Construction Inc.	USA	Construction and secondment services
Cockram Project India Pvt Ltd	India	Secondment services, did not operate in 2020, currently the status is under liquidation.
Scenario Cockram Limited ( <b>SCL</b> )	Hong Kong	Rockwork & showset production in Hong Kong, USA, Thailand and China. <sup>2</sup>

Kajima Development Australia Pty Ltd (**KDA**) is wholly owned by KA but it did not meet the consolidated revenue requirements of the Act to submit a modern slavery statement. KDA invests in land developments primarily in Victoria but also in other states of Australia and New Zealand.

Icon Developments Australia Pty Ltd (**IDA**) is a majority owned subsidiary of KDA and did not meet the revenue requirements of the Act.

<sup>1</sup> KIH has its own separate modern slavery statement.

<sup>2</sup> SCL has the plants to assemble the products, but the process and supply chain of the production is similar to those of construction services.

## 2.2 **Operations**

During the Reporting Period, KA employed 6 people and KCI employed 5 people. KCA did not have any employees. All 11 roles were based in Victoria.

Approximately, 400 people were employed by the foreign subsidiaries of KCI, located across the various jurisdictions in which those subsidiaries are domiciled. Roles performed by employees include construction managers, project managers, production managers, designers, secondees to clients, office staff and factory staff.

## 2.3 **Supply chain**

As the Reporting Entities are holding companies, our supply chain is limited to that of professional services such as accountants and lawyers, office leases, utilities, facilities maintenance, catering, telecommunications and IT hardware. Our suppliers are predominantly located within Australia although some suppliers may procure material items from overseas locations.

The supply chain of KCI's subsidiaries (which are not reporting entities) are diversified by virtue of their operations in the construction sector in overseas locations. Procurement categories of KCI's subsidiaries includes construction (production) materials, plant and equipment, various tradespeople and labourers, in addition to the categories described for the Reporting Entities.

# 3 **Modern slavery risks**

## 3.1 **Modern slavery risks in the operations and supply chain of the Reporting Entities**

The operations of the Reporting Entities are based in Victoria and the 11 people employed by the Reporting Entities perform highly-skilled office-based roles. Having regard to the worker profile and Australia's robust industrial relations laws, we consider that the overall risk of modern slavery in our operations to be very low. Likewise, the risk of modern slavery in the first tier of our supply chain is considered low as we procure goods and services predominately from Australian based businesses. Nevertheless, there are inherent risks in the later tiers of our supply chain in goods such as IT and telecommunications equipment and services such as facilities maintenance.

## 3.2 **Modern slavery risks in the operations and supply chain of KCI's foreign subsidiaries**

Based on information published by the Global Slavery Index, there are increased risks of modern slavery in countries such as China, India and Thailand. The employment of workers in KCI's foreign subsidiaries in those higher risk locations may present some risks. However, the Reporting Entities consider that the risks are mitigated by virtue of the proportion of skilled workers in the countries associated with increased risks and KCI's compliance with all industrial relations laws and regulations in the countries in which it operates.

An area of increased exposure to modern slavery risk is in the supply chain of KCI's foreign subsidiaries operating in the construction sector and subcontractors involved in showset/rockwork production.

Labour hire, materials and construction services are the main areas of exposure to modern slavery risk in respect of the supply chain of KCI's subsidiaries.

Potential modern slavery risks in the construction sector may emerge from:

- outsourcing
- contract terms with competitive margins and pressure on delivery times
- some reliance on a migrant workforce with limited English competency and temporary visa arrangements
- visibility over supply chains and sub-contracting arrangements
- use of labour hire providers
- materials that are sourced from countries with higher inherent modern slavery risk

- dangerous or substandard working conditions outside direct control, including:
  - workers who are not paid fairly or withheld entitlements
  - workers who may be required to work excessive hours
  - workplace safety concerns

### 3.3 Modern slavery risks in the operations and supply chain of IDA

IDA's operations are limited to residential and commercial property development in Australia. We consider that the risk of modern slavery in the operations of IDA is low for the following reasons:

- IDA's 8 employees are all located in Australia; and
- IDA complies with all industrial relations laws and regulations.

Labour hire, materials and construction services are the main areas of exposure to modern slavery risks in respect of IDA's supply chain.

## 4 Actions taken to assess and address modern slavery risks

As this is the first reporting period, we sought to prioritise our efforts in assessing and addressing the risks of modern slavery in operations and supply chains within KA group.

During the Reporting Period, no incidences or practices of modern slavery were identified in the operations and supply chain of the Reporting Entities. In the event that our business is found to have caused or contributed to an actual instance of modern slavery, our immediate priority would be the safety and wellbeing of the victim and then to work with the supplier(s) in question to facilitate change of practices to minimise the risk of future recurrence. Specific remediation activities would be determined on a case-by-case basis to ensure the most appropriate and effective actions are undertaken.


## 5 Assessing the effectiveness of our actions

Over the next few reporting periods, the Reporting Entities will continue to review our internal processes to assess and address modern slavery risk.

## 6 Consultation and approval

In preparation of this Statement, the board representatives of the Reporting Entities and their owned or controlled entities received a modern slavery briefing outlining the compliance obligations under the Act.

This Statement was approved by the board of Kajima Australia Pty Ltd on 25 June 2021 for and on behalf of the Reporting Entities.



Motohiro Umehara  
Managing Director  
Kajima Australia Pty Ltd  
Signature  
Date: 28 June 2021