

MODERN SLAVERY STATEMENT 2022 Rev 3

1 Introduction

This statement is made by Kajima Icon Holdings Pty Ltd (ACN 617 584 175) (**KIH**) and its wholly owned or controlled subsidiaries (together, “Icon”, “we”, “us” and “our”). The statement is made pursuant to the *Modern Slavery Act 2018* (Cth) (**MSA**) and sets out the actions taken by Icon to assess and address modern slavery and human trafficking risks within our business and supply chain for the financial year ending 31 December 2022 (**Reporting Period**).

Icon is wholly owned by Kajima Construction Australia Pty Ltd, whose ultimate parent company is Kajima Corporation, a Japanese publicly listed construction company headquartered in Tokyo. Kajima Construction Australia Pty Ltd is wholly owned by Kajima Australia Pty Ltd and these two entities, along with Kajima Cockram International Pty Ltd, submit their own joint modern slavery statement. For this reason, Icon submits this statement as a single modern slavery statement under section 13 of the MSA.

Icon has four core values which define who we are and how we operate:

- **Think people** – people are our business. We look out for each other and create safe, healthy workplaces that celebrate diversity.
- **Act together** – we are stronger together and our actions speak louder than words. Our people embody a collaborative spirit with clients, partners, and local communities.
- **Create possibilities** – we know it takes hard work to get the job done. We are open minded, and solutions driven and take responsibility for our action and demonstrate leadership in the face of adversity.
- **Earn success** – we consistently challenge ourselves. Innovation, problem solving and continuous improvement are the basis of everything we do.

We recognise that people are our most important asset. We seek to ensure that our workplaces are safe and healthy for our people and other stakeholders and value diversity in our people. With a ‘people come first’ culture, we advocate equal opportunity and aim to make all employment decisions based on merit and without discrimination.

2 Our structure, operations and supply chains

2.1 Structure

Icon is made up of several entities that provide construction and other services to third parties and internally. These entities include:

- Icon Corporate Services Pty Ltd;
- Icon Co Holdings Pty Ltd which is the 100% owner of:
 - Icon Co (Aust) Pty Ltd;
 - Icon SI (Aust) Pty Ltd;
 - Interface Cladding and Façade Pty Ltd (100% owned);
 - Barpa Pty Ltd (49% owned);
 - Leighs Cockram JV Limited (New Zealand only) (50% owned);

- Icon Co (QLD) Pty Ltd;
- Minicon Construction (Qld) Pty Ltd;
- Minicon Construction (Aust) Pty Ltd;
- Icon Co (NSW) Pty Ltd;
- Cockram Construction New Zealand Limited (New Zealand only); and
- Icon Co Pty (NZ) Limited (New Zealand only).

Operations

Icon is one of Australia and New Zealand's largest construction providers operating across a wide range of private and public sectors with projects ranging in size from \$0.5 million to \$400 million and annual revenues in excess of \$1.7 billion (refer to "our projects" section below for further details, including the services provided by Minicon and Barpa).

Icon has offices in Victoria, New South Wales, Queensland, Australian Capital Territory, Northern Territory, Western Australia and New Zealand. These offices support Icon's construction activities in each region, including by providing IT, HR and finance support functions. KIH's registered office is 110 Cubitt Street Richmond VIC 3121.

Our operations include the Bendigo GovHub Joint Venture (with Fairbrother) in Victoria, the Yulu Joint Venture (with Njamal Resources Enterprises) in Western Australia and the Joint Venture (with Reeves) on selected Australian and Pacific projects. These Joint Ventures have been included in this statement and the risk assessment provided below.

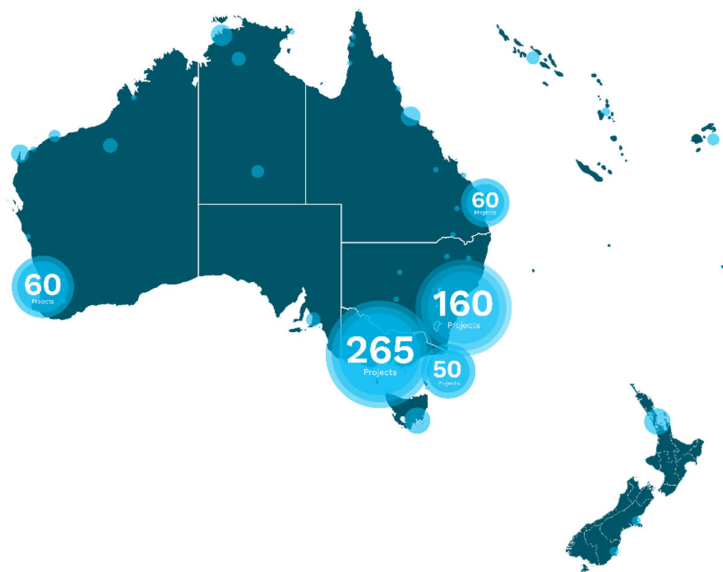
During the Reporting Period, Icon employed approximately 763 staff of which 21 were casuals, 718 were full time and 24 were part time. The roles performed by our employees included:

- Construction workers who provide a variety of support functions for Icon's construction operations, including site logistics management and maintenance services, supervision, traffic management, defects management and project team support
- Graduates / cadet
- Project coordinators
- Design (design coordinator, design manager)
- Services (service coordinator, service manager)
- Planning
- Estimating
- New business
- Submissions coordination
- Compliance
- Legal
- Site supervision
- Site Management
- Project Management
- Construction Management
- Commercial (contract administrator, Contract manager, commercial manager)
- Finance (Accounts payable / receivable, payroll, financial accountant, CFO, Group CFO)
- Human resources (HR BP, Group HR Manager)
- Administration (receptionist, administration assistant, executive assistant)
- Director
- Safety (Safety Coordinator, Safety Manager)
- Quality (Quality coordinator, Quality Manager)


Our projects


Construction of projects is performed by suppliers engaged by Icon. Our projects are predominately in the following sectors and located in Australia, New Zealand and the Pacific:

- Aged care/retirement
- Commercial/retail
- Data centre
- Defence
- Education
- Government
- Healthcare
- Hotels/leisure
- Industrial
- Laboratories/R&D
- Pharmaceutical
- Residential/student accommodation
- Sports
- Technology



The legal entities trading as Minicon and Barpa perform the following activities:

	<p>Minicon delivers projects at small to medium project values across many sectors, including health and science, technology, education, commercial and high-end residential.</p>
	<p>Minicon operates autonomously and with independence whilst benefiting from the expertise, financial capacity and corporate strength afforded by Icon and Kajima Australia Pty Ltd. Minicon shares financial, OHS & E, IT and innovation and IP resources with Icon and Kajima.</p>

	<p>Barpa is an Indigenous joint venture between the majority owners, the Federation of Victorian Traditional Owner Corporations (51 per cent), and Icon, which provides expertise and additional staff to support Barpa's growth and development.</p> <p>Barpa is also the 100% owner of the Kianga Group, a subcontract painting and coatings business operating Australia-wide.</p>
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2.2 Supply chain

Icon's supply chain has not significantly changed since our 2021 Statement. Our tier one supply chain continues to consist primarily of suppliers of construction materials, plant and equipment, various tradespeople and labourers, IT and communications services, software and hardware, professional services and consultants, utilities and facilities.

The majority of our construction work is completed via the standard construction industry subcontracting model with all trade works provided via either subcontracting businesses (that provide all materials, labour, supervision and plant) or suppliers that provide materials for installation by those other subcontractors on the project.

Any other preliminary works on the project (traffic management, cranes, security, etc.) are also subcontracted out to our suppliers.

Our suppliers continue to be predominantly located within Australia, although some may procure material items from overseas locations. In addition to our Australian suppliers, we have a significant number of suppliers domiciled in China including those who supply us with Façade and Joinery.

We have limited visibility of our second and third tier suppliers of construction materials. However, we continue to take actions to expand this oversight by conducting modern slavery risk assessments and issuing supplier questionnaires as part of our onboarding processes. We describe this risk assessment process and the actions we take to address modern slavery risks further below.

3 Modern slavery risks in our operations and supply chains

3.1 Risk assessment process

As part of our supplier onboarding and operational risk management processes, we have designed a modern slavery risk matrix. The risk matrix uses the Australian and New Zealand Standard Industrial Classifications (**ANZIC**) and assigns risk ratings for modern slavery to each industry division and subdivision. The risk matrix also assigns risk ratings to countries and product categories. For example, we are aware that ANZIC 30 – Building Construction is classified as high-risk for modern slavery, as are products such as bricks, sandstone, gravel, granite and various minerals.

3.2 Modern slavery risk assessment of our operations

Using the risk matrix and applying it to our operations, we found there to be relatively low risk of modern slavery overall. The majority of Icon's direct employees are located in Australia and New Zealand, and are employed in functions or roles which pose low risks of modern slavery. However, the key risk of modern slavery arising in our operations is some reliance on a migrant workforce with limited English competency and temporary visa arrangements. Icon notes that these risks arise predominately in our directly-employed construction workforce, which involves the performance of some services with higher risks of modern slavery, such as site maintenance and construction labour.

3.3 **Modern slavery risk assessment of our supply chain**

Using the risk matrix and applying it in the process of supplier onboarding, we identified factors which increase the risk profile for modern slavery in the construction sector, including:

- outsourcing;
- contract terms with competitive margins and pressure on delivery times;
- limited visibility over supply chains and sub-contracting arrangements;
- use of labour hire providers;
- sub-contractor providers not having appropriate systems in place to ensure they meet minimum requirements;
- operations in the Pacific region where there are lower labour standards and protections for workers.

We also identified our suppliers which provided goods and/or services from industries with higher modern slavery risks as follows:

- Site maintenance and security
- Cement, Lime, Plaster and Concrete Product Manufacturing
- Fabricated Metal Product Manufacturing
- Waste Collection, Treatment and Disposal Services
- Basic Material Wholesaling
- Defect repair and maintenance
- Postal and Courier Pick-up and Delivery Services
- Personal protective equipment and uniforms
- IT and telecommunications hardware
- Façade and joinery fabrication

Labour hire, materials and construction services continue to be exposed to modern slavery risk. We recognise that our suppliers are likely to source products from overseas which in turn creates risk in our supply chain (both as a result of geographical indicators of risk relating to the location of product manufacture and also the process of transporting the products to Australia). As noted above, modern slavery risks are heightened in relation to the materials used in the construction sector where the sourcing of raw materials and the manufacturing of products often occurs in countries with increased risks of modern slavery. For example, granite from Nigeria, timber from Vietnam and Cambodia and steel from Bangladesh are products linked to child and forced labour according to the US Department of Labour.

During this reporting period, we have considered the specific operations risks involved in our Pacific region projects in Fiji, the Solomon Islands and Vanuatu. This includes local minimum age and minimum wage requirements. We are aware of in-country reports of 'child-swapping' processes which is essentially child trafficking. Human trafficking into Vanuatu is also a known risk due to the border being largely unpatrolled and illegal migrants having little to no rights. We have engaged with our project teams in these locations to assess these risks and no instances of these practices have been identified. We discuss how we are addressing these operational risks in section 4 below.

We did not identify any incidences or practices of modern slavery during this reporting period.

4 Actions taken to assess and address modern slavery risks

4.1 Overall approach to modern slavery

The KIH board of directors has overall responsibility for our Modern Slavery policy and processes and their implementation to comply with legal and ethical obligations. Managers at all levels are responsible for ensuring those reporting to them also understand and comply and we expect our employees, contractors and suppliers to raise concerns about suspected modern slavery associated with the Company or our partners or suppliers. Processes for raising these concerns is included in all training provided to and engagement with project teams. Our tenderers are also advised during the tender interview of the process, and the Code of Conduct clearly establishes the expectation that modern slavery concerns must be reported.

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.

4.2 **Recruitment processes**

Icon's recruitment practices require that:

- (1) labour hire used for site-based labour is sourced via registered recruitment agencies and the workers benefit from an industrial instrument;
- (2) every successful applicant must provide proof of age which is collected prior to commencement;
- (3) Icon at least meets relevant construction based minimum entitlements when engaging candidates;
- (4) all candidates who are successful through the hiring process are offered employment which they have the opportunity to voluntarily accept by signing an employment agreement with Icon; and

4.3 **Internal policies and procedures**

Icon has been engaged across several reporting periods in developing a Human Rights Policy, revising our Whistleblower Policy and Recruitment Policy, developing our internal training pack and revising our Code of Conduct. As of the end of this reporting period, the review of our Modern Slavery Policy was not yet completed, however we will be finalising this review and implementing the policy over the next reporting period.

We have also updated Icon's internal project commercial audits to now review the relevant project team's understanding of Icon's modern slavery policies and processes.

4.4 **Supplier onboarding and engagement**

We continue to work with clients and suppliers to ensure that all our endeavours are strategically and culturally implemented to achieve:

- (1) economically sustainable development;
- (2) protection of the environment; and
- (3) social enrichment.

Our supplier onboarding process requires suppliers to complete a modern slavery questionnaire. This questionnaire requires suppliers to identify:

- the locations of their operations and the manufacture/supply of their goods and services;

- the types of workers they engage, specifically any migrant, displaced, itinerant, prison, conscripted, labour hire or workers under the age of 18;
- whether they provide any accommodation or require workers to pay recruitment fees; and
- whether they have conducted a human rights impact assessment, using the language of the United Nations Guiding Principles on Business and Human Rights 'caused, contributed or directly linked' framework.

Once suppliers have returned the modern slavery questionnaire, we assess their responses against Icon's modern slavery risk action plan. The risk action plan contains detailed guidance notes for our staff responsible for supplier and procurement relationships to assign each supplier a risk rating based on their responses to the questionnaire.

Any new suppliers for construction projects must also undergo an accreditation process, where they are assessed in various stages to ensure that they are financially viable, able to meet OWH&S requirements, and meet the commercial, policy and operating requirements set out by Icon. This includes confirming their commitment to Icon's Modern Slavery Policy, Supplier Code of Conduct, and related procurement requirements, documentation and approvals, including the provision of all necessary information and resources to achieve the obligations set out in the applicable Modern Slavery Risk & Action Plan for the construction works.

Icon's suppliers are also required to:

- participate in and provide required information for any audits Icon may wish to conduct of modern slavery compliance; and
- promptly report any modern slavery risks, issues or other information relevant to suppliers' modern slavery obligations to Icon.

We note that a key challenge for Icon has been ensuring consistent implementation of these processes and this is an area which we will prioritise for the next reporting period.

Offshore Procurement Team

Further to the process outlined above, in this reporting period Icon focused on engagement with its Offshore Procurement Team which is responsible for managing the sourcing of Joinery and Façade, typically from China. As demonstrated by our risk assessment, we note that this type of procurement presents product and geographic-based modern slavery risks. For this reason, we gave specific modern slavery briefings to our Offshore Procurement Team to raise awareness of 'red flags' of modern slavery and how to comply with Icon's modern slavery obligations, including the assessment of modern slavery questionnaires collected from primary suppliers.

We also engaged with the Offshore Procurement Team to complete risk action plans, although these remain at a preliminary stage. In future reporting periods, we are looking to use our offshore resources and the international mobility of the Australian-based Offshore Procurement Team to increase physical inspections of suppliers, including prescribed checklist items, to begin validating the responses given by key suppliers to Icon's modern slavery questionnaire.

4.5 Pilot projects

During the 2022 reporting period, Icon established further pilot projects which have been designed to support the progressive implementation of Icon's modern slavery compliance tools and templates. In addition to the project in respect of Vanuatu operations referred to in last year's statement, Icon has established the following pilot projects:

- IGLU Bondi – student accommodation;
- FIE projects – defence;
- Halcyon Apartments – residential;
- Chevron One Apartments – residential; and
- Auckland Airport – infrastructure.

Over and above the modern slavery questionnaire and risk action plan, the pilot projects have involved incorporation of relevant modern slavery compliance documentation into tenders, or insertion into existing procurement forms (e.g. Invitation to Tender Letter, Tender Interview, Subcontracts). Our Risk & Compliance team and the project teams continue to explore effective, achievable responses and commitments from suppliers and subcontractors and are seeking to determine an established set of Icon risk mitigation standards.

We note that our Vanuatu project raises specific modern slavery risks, and we continue to address these risks by conducting worker eligibility checks (including age and identity checks) as part of all project inductions.

4.6 Internal training

In addition to the training undertaken with our Offshore Procurement Team, we have conducted training with our pilot project teams and began the process of implementing six-monthly briefings for all staff across Icon. Icon-wide training will be an ongoing action item for subsequent reporting periods, as outlined further below in section 5.

5 Assessing the effectiveness of our actions

During the 2022 Reporting Period, we implemented actions committed to in our 2021 statement to improve our capability to assess and address modern slavery risks in the operations and supply chain of the pilot projects and broader business. These actions are described above in section 4 of this statement.

5.1 Assessing effectiveness

We assessed the effectiveness of these actions by considering the scale of implementation and/or uptake of the actions, responses to our modern slavery compliance tools and templates, whether there were any reported incidents of modern slavery in our operations and supply chain, and awareness across our employees, suppliers, contractors and other stakeholders.

The assessment of the effectiveness of our actions involved the following steps and observations during the reporting period:

- **Pilot projects:** We undertook internal compliance audits for four of the five pilot projects (outlined above) and we participated in an external audit of the Vanuatu project.
 - **Internal audits:** These audits identified that ongoing development and embedding of processes remains a priority and provided further information regarding the effectiveness of the collection, analysis and definition of appropriate risk mitigation standards and evidence. No significant new risks were identified during the audits, however the process of embedding the risk assessment procedures is ongoing and is being used to support the development of processes across the group.
 - **External audit (Vanuatu project):** following the Vanuatu project audit, Icon discussed the results and key action items with the client. We have been unable to implement these actions due to cyclones and earthquakes experienced in the

region, which has required the project team to focus on reactivating and repairing the project site, and supporting local communities. We will be reconsidering implementation of the action items with the client during the next reporting period.

- **Internal training:** We focused on awareness-raising of modern slavery risks among our procurement and project teams. Icon is committed to continued efforts to increase awareness as a foundation for adequately embedding our modern slavery compliance processes. For this reason, we have begun implementing six-monthly briefings for all staff, and have provided ad hoc training for project teams, particularly if clients raised queries regarding our compliance with the MSA and we want to ensure our staff are equipped to comply with internal and external modern slavery compliance processes. We provide informal training and advice to projects undertaking their annual commercial audit and will be focusing on expanded implementation of modern slavery training programs in the next reporting period. The integration of an assessment of the understanding of Icon's modern slavery policies and processes into the commercial audit process has also begun to provide Icon with useful feedback on which areas of the organisation we should prioritise when rolling-out modern slavery training and other initiatives.
- **Supplier engagement:** Although our supplier onboarding processes have prioritised embedding modern slavery compliance tools and templates, including in contractual documents and tender processes, we continue to have limited supplier engagement and responsiveness to modern slavery issues. We have noted that this was also due to a lack of uniform implementation of our processes across all responsible teams. For this reason, we prioritised greater awareness-raising and strategic engagement with our pilot project teams and Offshore Procurement Team, which has led to greater uptake and implementation of Icon's modern slavery compliance processes.

5.2 Future actions to address modern slavery risks and measure our effectiveness

During the next reporting period, we will expand the promotion, implementation and effectiveness of our modern slavery compliance systems and processes across the business and assess our effectiveness by:

- Expanding the implementation of our modern slavery compliance processes from the pilot projects to 50% of our active projects.
- Finalising the review and beginning formal implementation of our new Modern Slavery Policy, Complaints and Grievances Policy and Whistleblower Policy.
- Reviewing and updating recruitment provider contracts to address modern slavery risks, such as explicitly prohibiting recruitment fees.
- Mandatory reporting to the Board of the top five red flag risks identified in modern slavery supplier questionnaires.
- Implementing annual physical / in-person modern slavery inspections / audits of all offshore Façade and Joinery suppliers.
- Developing an "Extreme" risk category for risk assessments and requiring mandatory reporting to the Board of these subcontractors / suppliers.
- Continuing to identify and document effective modern slavery evidence gathering and defined, effective risk mitigation measures and remediation framework, to promote and train those project teams where compliance is being fully implemented.

We will seek to assess the effectiveness of our actions by tracking against these goals during 2023 and report on progress in our next Modern Slavery Statement.

6 Consultation and approval

In the course of preparing this statement, the Group Business Systems Manager of KIH engaged with representatives of each of the group entities covered by this statement and

relevant project teams to obtain information for the purposes of completing this statement. This engagement reviewed group progress regarding modern slavery actions, discussed implementing future actions to address modern slavery risks and modern slavery compliance requirements.

The board representatives of all owned/controlled entities in the Kajima Icon Holdings group received a Modern Slavery Briefing convened by the Group HR Manager and Group Business Systems Manager outlining the Modern Slavery compliance obligations, risks and mitigation actions completed in 2022 and to be actioned during 2023.

This Statement was approved by the Board of Directors of Kajima Icon Holdings on 22 / 06 / 2023



Evan Byrne
 CEO/Managing Director
 Kajima Icon Holdings
 Date 22/06/2023

Reporting Criterion	Page
1 & 2. Identify the reporting entity and describe its structure, operations and supply chains	1
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	4
4. Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	5
5. Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	8
6. Describe the process of consultation with any entities the reporting entity owns or controls	10
7. Any other relevant information	-