



**RAWSON  
GROUP**  
— EST 1978 —

# Modern Slavery Statement

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RAWSON GROUP PTY LIMITED ACN 000 382 329  
PERIOD: 1 JAN 2021 – 31 DEC 2021





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# 1

## Introduction

Pursuant to the requirements of the Modern Slavery Act 2018 (Cth) (the Act), this statement sets out the actions taken by Rawson Group Pty Limited ACN 000 382 329 (Rawson) and its wholly owned or controlled entities to address and minimise the risk of modern slavery in its business and supply chain.

This is Rawson's second Modern Slavery Statement and covers the calendar year to 31 December 2021. In CY21, Rawson did not identify any instances of modern slavery in our operations or supply chain.

The term modern slavery is used to cover a broad range of exploitative practices including but not limited to situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom, child exploitation, child labour and other slavery practices like human trafficking and deceptive recruitment. Modern slavery manifests in supply chains, through a variety of labour rights abuses.

Rawson opposes slavery in all of its forms. At Rawson we are committed to addressing the risk of modern slavery in our operations, supply chains and contractors and to adopting measures to prevent all types of modern slavery, throughout our operations, subcontractors, and supply chains.



# 2

## Reporting Entities & Organisational Structure

### 2.1 IDENTIFYING THE REPORTING IDENTITIES

Rawson Group Pty Limited ACN 000 382 329 (Rawson) is a residential construction and development company based in New South Wales (NSW) with operations in both NSW and the Australian Capital Territory (ACT). Established in 1978, Rawson became part of the Daiwa House Industry Co Limited, Japan's largest homebuilder in 2018. Rawson is committed to the design, sale and construction of residential homes and developments in NSW and the ACT.

Rawson and the wholly owned or controlled entities as at 31 December 2021, which are listed in Annexure A – Reporting Entities, are identified as reporting entities for the purposes of the Modern Slavery Act 2018 (Cth).

Rawson submits this Statement as a Joint Statement on behalf of all of the reporting entities listed in Annexure A – Reporting Entities, pursuant to section 14 of the Modern Slavery Act 2018 (Cth).

### 2.2 CORPORATE GOVERNANCE

Rawson is committed to robust corporate governance policies and practices to ensure the continued success and growth of Rawson and its subsidiaries. Rawson proactively reviews its governance practices to meets its obligations as a responsible corporate entity.

### 2.3 ORGANISATIONAL STRUCTURE

The Rawson Board is comprised of a majority of non-executive directors responsible for ensuring that the Group is managed in a manner that protects and enhances the interests of its stakeholders and takes into account the interests of customers, suppliers, contractors and the wider community.

The Board is responsible for overseeing Rawson's response to modern slavery risks and for the approval of this Modern Slavery Statement. Rawson's approach to modern slavery risk management is reviewed by the Audit & Risk Committee, which was established in 2021.

### 2.4 CONSULTATION WITH SUBSIDIARIES

The effective control and management of Rawson subsidiaries is held by the Rawson Group Board and Executive Committee and operated from a centralised Head Office. All subsidiaries are subject to the policies, procedures, standards and reviews as outlined in this statement.

# 3

## Our Workforce

Rawson has assessed the risk of modern slavery in Rawson's operations as negligible to none. Rawson's employees are skilled professionals operating exclusively in Australia. There is no direct exposure to child labour, forced labour, exploitative labour practices, or other modern slavery key risk areas.

Rawson employs around 250 people who all have individual employment contracts that confer pay and entitlements which are at minimum in line with any relevant awards and minimum wage requirements.

All employees have access to the Managing Director and CEO and any issues or concerns can either be raised to the General Manager, People and Safety, the Managing Director or through the Whistleblower Policy.

During the COVID-19 pandemic, employees were asked to work from home in line with government policies and recommendations in place at the time. Videoconferencing was used extensively to maintain contact between employees with an increased focus on employee wellbeing and mental health.

Rawson's commitment to the ethical conduct of business and respect for human rights in the workplace is embedded in our policies and procedures, including:

- a) Code of Conduct;
- b) Harassment, Discrimination and Bullying Policy;
- c) Whistleblower Policy;
- d) Anti-Bribery Policy;

- e) Gift Receiving and Gift Giving Policy;
- f) Work Health and Safety (WHS) Policy;
- g) Flexible Work Policy; and
- h) Recruitment Policy.

All policies are readily available for view by all employees on Rawson's intranet. Together with our Values, these policies outline Rawson's expectations of its employees and culture and Rawson's commitment to supporting employees to feel safe, valued and included.











# 4

## Our Supply Chain

Rawson has a diverse range of suppliers, including Government Authorities, building contractors (civil and built form), design consultants, engineers, surveyors, certifiers, information technology and security.

Our supplier and subcontractor selection process includes reviews to ensure compliance with Government mandated standards and compliance with health, safety and environmental standards.

When selecting suppliers and subcontractors, Rawson takes into consideration the geographical location of suppliers, original supply location and the type of goods and services, as well as their reputation.

Our direct suppliers have their own complex and diverse supply chains that can extend beyond Australian borders. This includes having many suppliers of materials or services who in turn rely on many more suppliers, both domestic and international. It is this extended supply chain that we have identified as being at the highest risk of breaching modern slavery laws. We are committed to working with our suppliers and the extended supply chain to identify and address modern slavery.

Our development spend is predominantly procured from Australian suppliers and consultants.

# 5

## Risks of Modern Slavery Practices

### 5.1 RISK ASSESSMENT

Rawson has assessed the risks, both external and internal, including international supply risks, sector risks and business partnership risks within its own operations and in its supply chain and we have determined that none of our own business operations are undertaken in higher risk areas, whether by reference to geographical location or business sector. Rawson relies on third party suppliers in its supply chain to provide the products and services related to residential construction. Rawson has undertaken a review of existing supplier relationships to identify any gaps with current suppliers.

Rawson Group will continue to monitor the risk of slavery and human trafficking in its supply chains and its own business, and we will act and report accordingly.

### 5.2 RISK CONTROL MEASURES

Where we have identified the chance for elevated risk in our supply chains, appropriate due diligence has been undertaken to satisfy ourselves that the parties concerned have in place ethical employment practices that comply with all relevant legislation including, where applicable, the making of a Modern Slavery Statement pursuant to the Modern Slavery Act 2018 (Cth). Where suppliers have not published a Modern Slavery Statement, they are required to confirm that they have in place such ethical employment practices and that they, in turn, require their suppliers to have the same.

Annual reporting is required from our suppliers with updated information and initiatives surrounding Modern Slavery in their business and supply chain network either through review of Suppliers Modern Slavery Statements and progress against identified risks.

Where a Supplier is not required to provide a Modern Slavery Statement we review alternatives in terms of assurance of adherence to principles.

Rawson has prepared a supplier and service checklist to assess direct or indirect risks of Modern Slavery Practices. We have strengthened our engagement with suppliers of high-risk operations. We have also engaged with our suppliers to understand how they are addressing their modern slavery risks.

Rawson Group will review and over time develop further guidance to Suppliers onboarded in the form of a Supplier Code of Conduct and Practice. This will be developed over the next twelve months. This review will include updating terms and conditions across Rawson, including asking for verification and endorsement of receipt. This process will be part of the future onboarding process for new and existing Suppliers and Contractors.

# 6

## Risk Management

### 6.1 AUDIT AND RISK COMMITTEE

In 2021 Rawson established an Audit and Risk Committee to assist the Rawson Board of Directors in monitoring and reviewing any matters of significance which may affect financial reporting and compliance. The broad functions of the Audit and Risk Committee are to oversee Rawson's financial reporting, systems of internal control and its risk management framework, along with compliance with legal and regulatory requirements, and the setting of Rawson's risk appetite.

### 6.2 SUPPLIER AND SUBCONTRACTOR MANAGEMENT

Rawson carries out due diligence on all suppliers and subcontractors via both the onboarding and induction process, and continued audits of existing suppliers and subcontractors. This includes:

- (a) Requiring improvements to any substandard employment of Work, Health and Safety practices; and
- (b) Sanctioning suppliers and subcontractors who fail to improve on performance in line with Rawson's minimum requirements.

### 6.3 EFFECTIVENESS OF RISK MANAGEMENT

We assessed effectiveness in CY21 by tracking our actions and outcomes which included: updating or adding to our governance documents; building on our internal knowledge and understanding of modern slavery; ongoing engagement with our key suppliers to identify, analyse, assess and, if required, report and/or remediate incidences of modern slavery in our supply and contractor chains.



# 7

## Response to Modern Slavery

### 7.1 WHERE WE ARE TODAY

A range of actions have been undertaken as part of Rawson's commitment to continuous improvement. In CY21 we have:

- (a) Established an Audit and Risk Committee which has developed a clear and detailed internal process for actioning any instances of modern slavery identified in our supply chain;
- (b) Engaged key suppliers and contractors to determine and verify salient modern slavery risks. This included requiring annual reporting from suppliers to provide updated information and initiatives surrounding Modern Slavery in their business;
- (c) Identified and assessed any suppliers with higher risks of modern slavery with their downstream services and suppliers overseas. We have reviewed these suppliers in line with risk prioritisation tools and are confident that they comply with the regulations;
- (d) Undertaken an ongoing review of our workplace practices and conditions, relevant awards and pay structures; and
- (e) Provided guidance to all employees to educate them on forms of modern slavery, how to identify modern slavery and how/when to report and respond to modern slavery.

### 7.2 PRIORITIES FOR 2022

A number of future priorities were identified in our inaugural Modern Slavery Statement which we intend to implement during CY22. These are:

- (a) Supplier Code of Practice: Creation and implementation of a Supplier Code of Practice to make our expectations of suppliers clear, including:

- (i) Zero tolerance of forced labour in Rawson's supply chain;
  - (ii) Meeting key standards and legislation on child employment;
  - (iii) Ensuring employees are compensated in compliance with wage laws; and
  - (iv) Engaging with supplier chains to adopt a fair, safe and ethical approach to responsible business;
- (b) Onboarding documentation: In order to further improve Rawson's supplier and subcontractor due diligence, in 2022 Rawson will amend our onboarding documents to include the following provisions:
- (i) The Supplier must take reasonable steps to identify, assess and address risks of Modern Slavery practices in the operations and supply chains used in the provision of the Goods and/or Services;
  - (ii) If at any time the Supplier becomes aware of Modern Slavery practices in the operations and supply chains used in the performance of the Contract, the Supplier must as soon as reasonably practicable take all reasonable action to address or remove these practices, including where relevant by addressing any practices of other entities in its supply chains; and
- (c) Staff training: Mandatory training for Directors, Executives, General Managers and Procurement specialists to improve their knowledge of modern slavery and increase their ability to identify risks in Rawson's operations, supply chain and subcontractors in respect to potential modern slavery.





8

Approval

This Modern Slavery Statement covers 1 January 2021 to 31 December 2021 and has been approved by the Rawson Board of Directors at the Board meeting held 1 June 2022.

Signed by:



Gary Flowers,  
Chairman



Nick Chandler,  
Managing Director & CEO

Annexure A -  
Reporting Entities

COMPANY NAME	ACN	ABN
Rawson Group Pty Limited	000 382 329	64 000 382 329
Rawson Homes Pty Limited	053 733 841	67 053 733 841
Rawson Communities Pty Limited	003 203 745	20 003 203 745
Rawson Legal Pty Limited	167 806 135	62 167 806 135
Home & Land Centre Pty Limited	607 038 433	83 607 038 433
Thrive Homes Pty Limited	613 679 333	99 613 679 333
Fern Bay No 1 Pty Limited	168 462 048	18 168 462 048
Fern Bay No 1 Trust	N/A	80 185 298 149
Aurora (Alex Ave) Pty Limited	163 788 305	95 163 788 305
The Aurora Unit Trust	N/A	78 402 911 234
Schenectady Pty Limited	616 100 228	N/A
Schenectady Trust	N/A	96 473 663 422
Fort Meyers Pty Limited	616 439 260	N/A
Fort Meyers Trust	N/A	86 645 364 293
Port Huron Pty Limited	619 867 284	N/A
Port Huron Trust	N/A	51 824 337 092
Mint Loans Pty Limited	622 298 079	80 622 298 079
Mint Loans Trust	N/A	35 634 683 032
RC Resi No 1 Trust	N/A	76 998 062 289
RC Resi No 2 Pty Limited	602 813 150	N/A
RC Resi No 2 Trust	N/A	99 409 312 440
RC Resi No 3 Pty Limited	602 847 325	N/A
RC Resi No 3 Trust	N/A	29 189 440 504
RC Resi No 4 Pty Limited	602 850 760	89 602 850 760
RC Resi No 5 Pty Limited	602 851 954	76 602 851 954
RC Resi No 6 Pty Limited	602 860 999	93 602 860 999
RC Resi No 7 Pty Limited	602 861 003	N/A
RC Resi No 7 Trust	N/A	25 291 312 625
RC Resi No 8 Pty Limited	607 041 430	N/A
RC Resi No 8 Trust	N/A	97 798 640 184
RC Resi No 9 Pty Limited	609 906 514	N/A

COMPANY NAME	ACN	ABN
RC Resi No 9 Trust	N/A	21 953 272 487
RC Resi No 10 Pty Limited	609 906 756	N/A
RC Resi No 10 Trust	N/A	94 509 759 955
RC Resi No 11 Pty Limited	609 907 468	N/A
RC Resi No 11 Trust	N/A	38 424 292 883
RC Resi No 12 Pty Limited	609 915 264	98 609 915 264
RC Resi No 14 Pty Limited	609 925 251	72 609 925 251
RC Resi No 14 Trust	N/A	74 804 107 288
RC Resi No 15 Pty Limited	609 948 709	47 609 948 709
RC Resi No 15 Trust	N/A	92 174 990 499
RC Resi No 16 Pty Limited	609 949 484	N/A
RC Resi No 16 Trust	N/A	45 572 434 323
RC Resi No 17 Pty Limited	609 949 877	N/A
RC Resi No 17 Trust	N/A	97 178 196 027
RC Resi No 18 Pty Limited	609 949 984	N/A
RC Resi No 18 Trust	N/A	99 836 152 669
RC Resi No 19 Pty Limited	609 951 475	N/A
RC Resi No 19 Trust	N/A	41 701 564 558
RC Resi No 20 Pty Limited	647 976 289	N/A
RC Resi No 20 Trust	N/A	54 193 440 207
RC Resi No 21 Pty Limited	648 329 748	N/A
RC Resi No 21 Trust	N/A	77 884 560 876
RC Resi No 22 Pty Limited	655 564 202	N/A
RC Resi No 22 Trust	N/A	39 273 015 312
RC Resi No 23 Pty Limited	655 877 473	N/A
RC Resi No 23 Trust	N/A	52 870 114 452
RC Resi No 24 Pty Limited	655 875 237	N/A
RC Resi No 24 Trust	N/A	13 749 845 428
RC Resi No 25 Pty Limited	655 875 871	N/A
RC Resi No 25 Trust	N/A	32 784 160 230









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