

## **Daiwa House Group UK Modern Slavery Act Statement**

### **1. Introduction**

We, Daiwa House Industry Co., Ltd. and its subsidiaries (collectively referred to as the "Daiwa House Group" or the "Group") are committed to improving our practices to prevent slavery and human trafficking in our business and supply chains. In accordance with section 54 of the Modern Slavery Act 2015 (UK) (the "Act"), this statement highlights and sets out the policies and initiatives we have implemented to prevent modern slavery and human trafficking within the Group for the fiscal year ending March 2026.

### **2. Our Organisation, Business and Supply Chains**

We are a global group engaged in real estate development and construction, providing high-quality building solutions, operating across the residential, healthcare, office, logistics, education, government and industrial sectors. In addition to our core activities, we provide ancillary services including rental management and maintenance.

Daiwa House Industry Co., Ltd. ("DHI") is the parent company of the Group delivering these services in Japan and internationally, including project-based and business development activities in the UK carried out through its subsidiaries, such as Daiwa House UK Limited and Elephant Park Plot H11B LLP. The Group has over 50,390 employees worldwide and operates in 27 countries.

Daiwa House Modular Europe B.V. ("DHME") is a European modular construction company and part of the Group. DHME operates primarily in the Netherlands, UK, Germany and Belgium, including activities related to the manufacture and delivery of modular buildings for residential, industrial and education sectors.

Daiwa House Europe B.V. ("DHE") is a holding company of DHME and other subsidiaries of the Group, which is incorporated in the Netherlands and whose primary function is to provide intragroup management and administrative services to the Group's Europe-based subsidiaries including UK-based subsidiaries.

Our business is organised into six core business operations: residential housing, rental residential housing, condominium and apartment development, commercial facilities,

industrial and business facilities, and environmental and energy.

The Group's business activities have been conducted through supply chains involving the procurement of construction materials, components, equipment and services from both domestic and international suppliers. These supply chains may involve multiple tiers of suppliers and subcontractors, particularly in the areas of construction materials, manufacturing, logistics and specialist services.

To embed our core values and encourage open communication and feedback, we engage with a wide range of stakeholders (including, in particular, our suppliers and subcontractors) through our supply chain sustainability framework.

This statement is a group statement made by DHI on behalf of itself, DHME and DHE, each of which meets the reporting threshold under the Act. For further information on our organisation and business activities, please visit our websites below:

- DHI: <https://www.daiwahouse.co.jp/about/>
- DHME: <http://www.daiwahousemodular.eu>
- DHE: <http://daiwahouse.eu>

### **3. Policies Relevant to Modern Slavery and Human Trafficking**

We recognise that respect for human rights is fundamental to our business activities and do not tolerate any form of human rights abuse, including modern slavery and human trafficking. Accordingly, we aim to have appropriate policies in place that underpin our commitment to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

In 2018, the Group established the Daiwa House Group Human Rights Policy, which clearly positions respect for human rights as a core commitment within the Daiwa House Group Code of Conduct and Corporate Ethics Framework.

- [Daiwa House Group Human Rights Policy](#)
- [Daiwa House Group Principles of Corporate Ethics and Code of Conduct](#)

Guided by these policies and principles, the Group conducts its business activities in accordance with the following approaches:

- Compliance with applicable laws and social norms – the Group's policies are aligned with international standards, including but not limited to the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work;

- Respect for human rights throughout its business activities – this commitment extends throughout the Group's operations and supply chains; and

- Prevention of inappropriate labour practices – the Group is committed to identifying, preventing and addressing any form of labour exploitation.

These policies also set out the Group's expectations for suppliers and business partners, including with respect to the prevention of forced labour, modern slavery and other inappropriate labour practices.

#### **4. Due Diligence Processes**

To facilitate the early identification and remediation of human rights concerns including those related to modern slavery and forced labour, the Group has implemented reporting mechanisms that are accessible to employees and, where relevant, business partners and their workers in its supply chains. These mechanisms are not limited to modern slavery risks but encompass broader concerns relating to labour practices, health and safety, and human rights more generally.

Reports received through these mechanisms are reviewed in accordance with applicable internal procedures, and appropriate remedial actions are taken where necessary. The Group is committed to ensuring that individuals who raise concerns in good faith are protected from retaliation.

#### **5. Risk Assessment and Management**

In addition to the reporting mechanisms, we request our business partners to demonstrate how they address sustainability risks, and we monitor our activities using a risk-based approach, including engaging with external experts as well as subcontractors, clients and suppliers where necessary.

The Group implements, or continuously considers, the following measures to identify and mitigate risks related to labour practices, health and safety, and human rights, including modern slavery and human trafficking:

- conducting surveys and assessments to understand human rights risks within the supply chains;
- requesting suppliers and business partners to respect and uphold human rights; and
- prioritising responses to areas that are identified as having higher human rights risks.

Through these efforts and ongoing monitoring, where risks are identified within our supply chains, our approach is to seek to hold meetings with the relevant business partners and request that they make improvements promptly. Where necessary, we will consider visiting their factories and other facilities to verify the progress of those improvements.

To date, the Group has not identified any situations involving significant risks of modern slavery or human trafficking within its business operations or supply chains.

## **6. Effectiveness**

At this stage, the Group's approach to assessing the effectiveness of its actions to address modern slavery and human trafficking risks continues to develop (e.g., identifying the appropriate key performance indicators to measure effectiveness). Taking into account internationally recognised standards as well as the relevant laws and guidance, the Group is committed to continuous improvement, including enhancing its understanding of human rights risks in the supply chains, reviewing internal frameworks and policies, responding to regulatory developments, and promoting dialogue and awareness among relevant stakeholders

## **7. Training and Awareness**

The Group provides ongoing education and awareness activities for its officers and employees to enhance their basic understanding of legal compliance and respect for human rights, including through training conducted as part of broader compliance and ethics programmes. These activities support awareness of acceptable labour practices and promote responsible business conduct across the Group. The Group continues to update and deliver training on modern slavery and human trafficking and the steps that can be taken to prevent it.

## **8. Approval**

This statement is made pursuant to section 54(1) of the Act and constitutes our Group's slavery and human trafficking statement for the financial year ending March 2026. This statement was approved by the Board of Directors of DHI on September 9, 2026.

Keiichi Yoshii  
Representative Director and Chairman, CEO  
Daiwa House Industry Co., Ltd.