

Modern Slavery Statement FY2024

April 2024 – March 2025

Nishimatsu Construction Co., Ltd.

Trust. It's what we build.



NISHIMATSU

1. The Reporting Entity

Nishimatsu Construction Co., Ltd. (hereinafter, the “Company”, “Nishimatsu” and “We”) is a company incorporated in Japan and registered as a foreign company under the Corporations Act 2001 on 17th December 2021 (ABN 86 655 449 808).

2. The structure, operations, and supply chains

2.1 The Company Structure and operations

Nishimatsu is one of the leading general contractors in Japan and headquartered in Tokyo with regional headquarters and branch offices throughout Japan. The Company operates through five main divisions: Civil Construction; Building Construction; Real Estate, Energy & Environmental; and International.

The Company primarily conducts construction projects within Japan, but we also undertake construction projects in Singapore, Hong Kong, Malaysia, Thailand, Vietnam, Bangladesh, and the Philippines. Furthermore, our real estate development business and infrastructure investment extends beyond Japan to include the United States, Australia, Singapore, Thailand, Taiwan, and Vietnam.

Currently, the Company employs approximately 2,705 professional and technical staff domestically and about 360 overseas including one staff in Australia.

The Company has the following major subsidiaries.

Nishimatsu-Jisho Co., Ltd. (Minato-ku, Tokyo)
Nishimatsu Asset Management Co., Ltd. (Minato-ku, Tokyo)
Thai Nishimatsu Construction Co., Ltd. (Thailand)
Nishimatsu Vietnam Co., Ltd. (Vietnam)
Nishimatsu Real Estate & Development Asia Pte. Ltd. (Singapore)
Bangkok Sathorn Hotel Management Co., Ltd. (Thailand)

2.2 Operation in Australia

The Company has been actively exploring potential investments in Australia, focusing on renewable energy project development, including construction and equity participation, as well as real estate ventures.

In November 2023, through our subsidiary, Nishimatsu Real Estate & Development (Asia) Pte. Ltd. incorporated in Singapore, the Company has invested in a real estate fund that was co-founded and is currently managed in partnership with an Australian real estate management firm. The fund's assets are centred around a large-scale mixed-use complex in Sydney.

Following that, the company acquired a stake in April 2024 in a company that is an investor in a special purpose vehicle (SPC) for a PPP project currently being undertaken in Queensland, thus becoming indirectly involved in the project. SPC for the PPP project has been reporting its Modern Slavery Statement annually since 2021.

The Company did not undertake any construction projects in Australia during the fiscal year 2024.

2.3 Overview of the Supply Chain

The Company's supply chain is extensive and intricate, given the nature of the construction industry. It involves a vast network of suppliers, subcontractors, and other partners who provide materials,

equipment, and services necessary to complete construction projects. The Company places a strong emphasis on building and maintaining robust relationships with its supply chain partners, aiming for a collaborative approach to ensure the timely delivery of high-quality projects.

The Company has established supply chains in various countries, primarily sourcing the necessary materials, equipment, and services locally. However, if materials cannot be procured domestically, they are sourced from overseas.

The Company recognises it is important to work together with their business partners throughout the supply chain under a partnership for the Company to continue to conduct sound business activities. Therefore, the Company has established a "Procurement Policy" based on the "Corporate Philosophy" and "Code of Conduct" and is working to promote procurement activities that take into account Corporate Social Responsibility. The Procurement Policy consists of 9 articles. Among them, Article 1 declares that the Company will comply with laws and social norms both domestically and internationally, and Article 3 declares that the Company will respect personality and human rights and strive to ensure appropriate working conditions.

In addition, the Company has issued "Declaration of Partnership building" to the suppliers on 29th March 2024 that declares its commitment to building sustainable partnerships by fostering cooperation and coexistence with our supply chain partners and other value-creating businesses.

Moreover, the Company established the Nishimatsu Construction Cooperative (commonly known as N-Net) in 2011 with the aim of promoting mutual prosperity and solidarity among its member companies. Through collaboration with member companies, N-Net works to enhance technical capabilities, reduce costs, exchange information, and provide compliance training, ultimately contributing to the growth and performance of the companies involved. As of 31st March 2025, the membership of N-Net has grown to 1,023 companies.

3. The risks of modern slavery practices in the operations and supply chains

The Australian Modern Slavery Act 2018 (the Act) defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. The worst forms of child labour means situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

Generally, the construction industry is widely recognised as one of the sectors with a high risk of modern slavery. This can be attributed to several factors:

- **Complex Supply Chains:** Construction projects typically involve intricate supply chains with numerous layers of subcontractors, making it challenging to trace the origin of materials and labour.
- **Multi-layered Contracting Structures:** The common practice of primary and secondary contracting can obscure the employment relationships and create opportunities for exploitation.
- **Dependence on Foreign Workers:** The construction industry often relies heavily on foreign workers, who may be more vulnerable to exploitation due to language barriers, precarious immigration status, and limited access to legal protections.
- **Labour-Intensive Nature:** The labour-intensive nature of construction work can create pressure to cut costs, potentially leading to the exploitation of workers.

Nishimatsu operates construction and real estate businesses in Japan, Asia, Australia, and the

United States, and we have identified that there are varying risks of modern slavery in construction businesses in Japan and Asia (the Company did not undertake any construction projects in Australia and the United States during the fiscal year 2024).

Japan

- **Migrant Workers:** Japan has been relying on migrant workers in construction, who are vulnerable to exploitation due to:
 - Debt bondage through recruitment fees
 - Passport confiscation
 - Unfair contracts and wage discrepancies
 - Poor living conditions
- **Subcontracting:** The multi-layered subcontracting system can obscure labour practices, making it difficult to monitor for forced labour or other abuses.

Asia (Bangladesh, Hong Kong, Laos, Malaysia, Philippines, Singapore, and Vietnam)

- **Forced Labour:** The region is known for risks of forced labour in sectors like:
 - Mining (for materials like sand, gravel)
 - Timber logging
 - Manufacturing of construction materials
- **Child Labour:** Child labour can be present in the production of bricks, tiles, and other materials.
- **Vulnerable Migrants:** Migrant workers from neighbouring countries are at high risk of exploitation due to:
 - Lack of documentation
 - Language barriers
 - Fear of deportation

We have also identified general supply chain risks in our operations.

- **Raw Materials:** Sourcing materials like timber, minerals, and aggregates from regions with weak governance can expose the company to risks of forced labour, land grabs, and environmental damage.
- **Manufacturing:** The production of steel, cement, and other construction components may involve factories with poor working conditions and labour rights violations.

4. The actions taken to assess and address modern slavery risks

4.1 Human Rights Policy

Nishimatsu Construction Group (hereinafter referred to as "the Group") conducts business activities with the corporate philosophy of "creating a sustainable society where people can live safely with valuable buildings and services" as our social mission. We believe that the fundamental human rights of all people involved in our business should be respected in realizing this philosophy and have formulated the Group Human Rights Policy based on the United Nations Guiding Principles on Business and Human Rights.

Please refer the following website link for Nishimatsu Construction Group Human Rights Policy (Japanese only). The English translation is available in Appendix A.

<https://www.nishimatsu.co.jp/company/policies.html>

4.2 Procurement Policy and Procurement Guidelines

In addition, the Group has formulated a procurement policy as follows and procurement guidelines based on the Corporate Philosophy and Code of Conduct. By obtaining the understanding of and active support from our partner companies, we are advancing ESG-conscious procurement activities via cooperation throughout the supply chain as a means of fulfilling our social responsibilities and realizing a sustainable society.

Procurement Policy

- | | | |
|--|---|---|
| 1. Compliance with laws, regulations, and social norms | 5. Environmental conservation activities | 8. Social contribution activity initiatives |
| 2. Fair and equitable transactions | 6. Assurance and enhancement of quality | 9. Business activity continuity in the event of disasters |
| 3. Respect for human rights | 7. Thorough information security and disclosure | |
| 4. Promotion of health and safety | | |

Please refer the following website link for Nishimatsu Construction Group Procurement Policy and Procurement Guidelines (Japanese only). The English translations are available in Appendix B and C.

<https://www.nishimatsu.co.jp/company/policies.html>

4.3 Human Rights due diligence processes

The Group has established a human rights due diligence system in accordance with the UN Guiding Principles on Business and Human Rights. This is a continuous process, based on our commitment to human rights (the Group's human rights policy), that spans from the identification of human rights issues in the Group's value chain, to the planning, implementation, monitoring, and disclosure of corrective actions, and finally, to communication with external stakeholders. We will strive to prevent and mitigate negative impacts on human rights that our company may have on society by continuously cycling through this entire process.

- (1) Identification and evaluation of human rights risks (negative impacts)
- (2) Integration of these risks within the Company's risk management system and implementing of appropriate measures
- (3) Follow-up survey on effectiveness of measures
- (4) Information disclosure

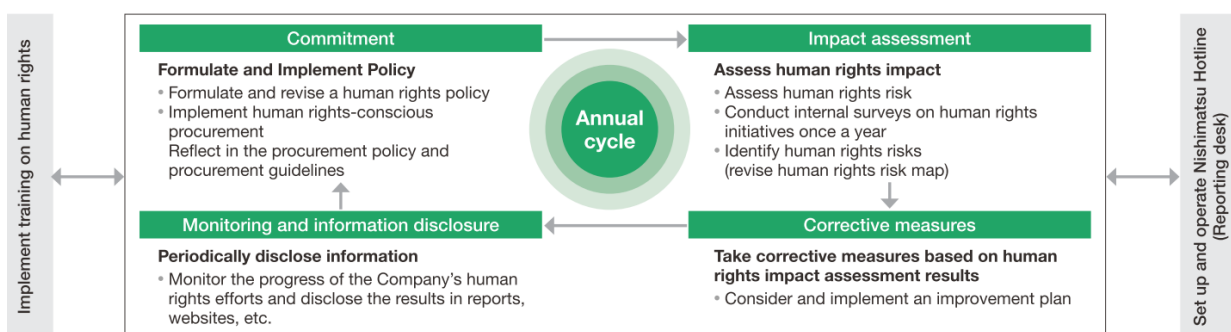


Fig 1 Human Rights due diligence process

In fiscal year 2024, the company conducted human rights due diligence on approximately 50% of key business partners, with a focus on N-Net member companies. As a result, the company identified 5% of the key business partners with high human rights risk.

In fiscal year 2025, the company plans to conduct interviews with these companies to verify facts, encourage improvement measures as necessary, and monitor the progress of those improvements.

5. Assessing the effectiveness of the actions taken

In April 2023, the Company established a sustainability promotion system, creating the "Sustainability Committee," an advisory body to the Board of Directors, and the "Risk and Opportunity Management Committee," aimed at company-wide management of risks and opportunities.

The Sustainability Committee, comprised of executive Directors, non-executive Directors, and external experts, deliberates on matters such as materiality from a long-term and multi-stakeholder perspective, and response policies to environmental changes (risks and opportunities) related to materiality, based on inquiries from the Board of Directors, and reports its findings to the Board of Directors.

Beyond addressing the initiatives of the committees above, the Sustainability Committee also deliberated on setting quantitative sustainability KGI (Key Goal Indicators) and identifying medium- to long-term risks, reporting its conclusions to the Board of Directors.

5.1 Sustainability promotion system

The Company has established the Sustainability Strategy Meeting to study and implement a sustainability strategy to resolve materiality issues and to realize a sustainable society. In tandem with this, we established four committees in critical areas within the meeting, namely the Risk and Opportunity Management Committee, Human Rights Committee, DE&I Committee, and Environmental Committee, and appointed a chairperson and secretariat for each.

The Sustainability Strategy Meeting consists primarily of assistant general managers of each business division and representatives of each strategy office. This meeting consolidates each of the committees and conducts their overall management, and then reports on their conditions to the President and General Managers Meeting. The Sustainability Strategy Meeting, which includes these four committees, will perform as the leader of the Company's sustainability strategy, and actively engage in discussions with new perspectives and driving the promotion of sustainability.

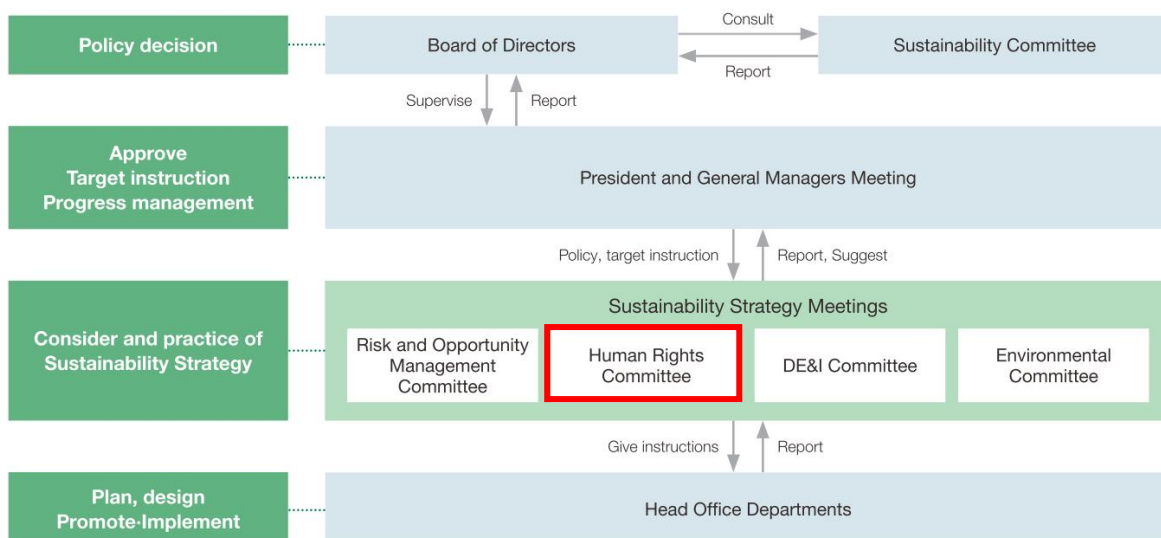


Fig 2 Sustainability promotion system

5.2 Human Rights Committee

Within the Sustainability Strategy Meeting, we have established a Human Rights Committee. The Human Rights Committee promotes initiatives targeting internal and external stakeholders based on our Human Rights Policy, including human rights due diligence in the supply chain.

Human Rights Committee assess the effectiveness of actions being taken to assess and address human rights risks as well as modern slavery risks annually to improve the company's response.

6. Approval of the statement

This statement has been approved by the Board of Directors on 31st July 2025.

1st August 2025



Masakazu Hosokawa
Representative Director and President

Appendix A.

Nishimatsu Construction Group Human Rights Policy

(English translation of the original Japanese text)

Human Rights Policy

The Nishimatsu Construction Group (hereinafter referred to as the "Our Group") conducts its business activities based on its corporate philosophy of "creating a sustainable society where people can live with peace of mind through valuable buildings and services" as its social mission. In realizing this philosophy, we believe that the fundamental human rights of all people involved in business should be respected, and we have formulated the Nishimatsu Construction Group Human Rights Policy based on the United Nations' Guiding Principles on Business and Human Rights. We will make this policy the basic stance of our business activities and promote efforts to respect human rights.

1. Scope of application:

This policy applies to all officers and employees (including seconded and temporary employees, etc.) of our group, including consolidated subsidiaries. Additionally, our group expects and urges our customers, business partners such as subcontractors, and supply chains to understand and support this policy.

2. Respect and compliance with norms and laws:

Based on the United Nations' Guiding Principles on Business and Human Rights, our group complies with human rights-related laws and regulations in the countries and regions in which we operate, as well as the International Bill of Human Rights, including the Universal Declaration of Human Rights, and the International Labour Organization ('ILO'). We support and respect international human rights standards such as the ILO Declaration on Fundamental Principles and Rights at Work and comply with these principles.

We also comply with the laws and regulations applicable in each country and region where we conduct business activities. When there is a conflict between the laws and regulations of a country or region and international norms, we will seek ways to respect international human rights norms.

3. Responsibility to respect human rights:

Our group will minimize the negative impact on human rights that may occur through our business activities by taking appropriate action when it becomes clear that our company is causing or contributing to a negative impact on human rights.

Our group strives to prevent industrial accidents and accidents, improve overwork, and long working hours, and promote the creation of a safe, sanitary, and healthy work environment and workplace that recognizes different cultures, customs, and values.

Furthermore, we prohibit all forms of child labour, forced labour, and human rights violations of foreign workers, and respect freedom of association and the right to collective bargaining. We ensure that all executive and employees (including seconded and temporary employees) have a working and living environment.

Our group respects human rights, including the safety and health of the local communities in which we operate, and strives to build good relationships and provide safe facilities to our users.

4. Initiatives to address human rights issues:

As the specific issues that our group must address change due to changes in society and business trends, we will engage in dialogue and consultation with stakeholders and outside experts and review our priority issues as appropriate. We are currently working on the following key issues as priority issues:

(1) Management of appropriate working conditions and creation of a comfortable working environment

The Group places emphasis on the work-life balance and continued work of all executives and employees (including seconded and temporary employees) in good health. To this end, we will thoroughly manage processes with sufficient margin and properly manage overtime work. In addition, based on our "Basic Safety and Health Policy," our group strives to create, maintain, and improve a safe, sanitary, and healthy working environment, prevent the occurrence of occupational accidents, and maintain a comfortable working environment.

(2) Prohibition of Harassment and Discrimination

Our group respects fundamental human rights, personality and individuality, and respects race, gender, nationality, age, sexual orientation, gender identity, religion, creed, ethnicity, disability, and physical characteristics. Prohibits all forms of discrimination, harassment, and unfair treatment based on social status, prohibits

power harassment that takes advantage of social status, and promotes initiatives to minimize disparities in treatment and wages in employment types.

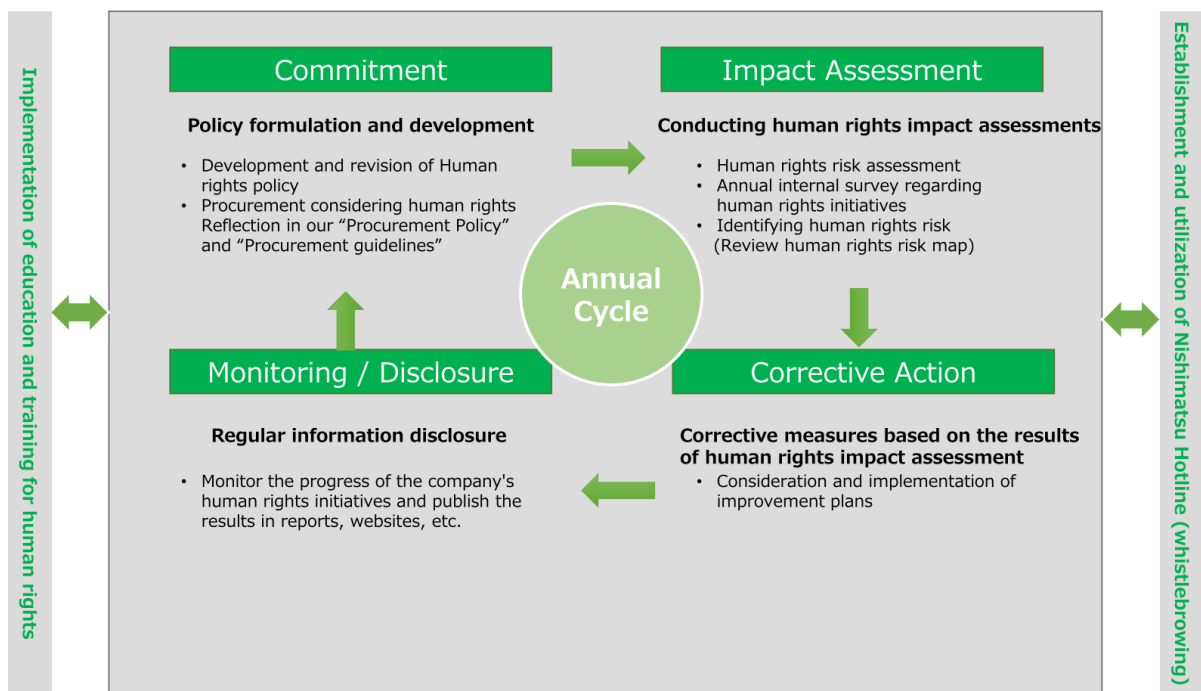
(3) Human rights of foreign workers

Our group will give appropriate consideration to the human rights of foreign workers, including foreign technical intern trainees, including their treatment.

5. Implementation of human rights due diligence:

Our group has established a human rights due diligence system and continuously improves the following processes.

- ① Identification and evaluation of human rights risks (negative impacts)
- ② Integration within the company governance system and implementation of appropriate measures
- ③ Follow-up survey on effectiveness of measures
- ④ Information disclosure



Due diligence process

6. Whistleblowing:

The Group operates the Nishimatsu Hotline, a whistleblowing system that allows reports to be made from within and outside the company and responds appropriately to reports of violations of human rights issues. The "Nishimatsu Hotline" is open to all employees, including those at overseas subsidiaries, as well as those outside the company. If you think there is a question about this policy, or if you wish to report a potential violation of this policy, please use this hotline.

7. Correction/Relief:

If it becomes clear that the company has caused or contributed to a negative impact on human rights, the Group will take appropriate action not only on all employees, including those at overseas subsidiaries, but also outside the company, including partner companies. We will work to correct and provide relief through appropriate means. In addition, the Compliance Promotion Department operates the Nishimatsu Hotline, which conducts regular monitoring to ensure that no negative impacts are caused or exacerbated in the supply chain, including our group and partner companies.

8. Human rights governance and promotion system:

The Board of Directors considers human rights issues as an agenda item, regularly reviews this policy and human rights risks, and conducts and supervises investigations into the existence of human rights violations in the supply chain. Our human rights issues are considered under the supervision of the Human Resources Department in Japan and the International Business Headquarters at overseas locations.

9. Education/Training:

In order to ensure that this policy is firmly established throughout our business activities, our group will reflect the idea of our human rights policy in the necessary procedures, and ensure that all executives and employees of our group (including seconded and temporary employees, etc.) We will carry out the necessary education and training to gain a sufficient understanding of this policy.

10. Dialogue and consultation with stakeholders:

The Group will continue to engage in dialogue and consultation with relevant stakeholders and outside experts regarding responses to actual or potential negative impacts on human rights.

11. Disclosure of Information:

Our group will regularly disclose on our website and other means our efforts to respect human rights based on this policy.

Date of enactment: March 1, 2023
Nishimatsu Construction Co., Ltd.
Representative Director and President
Masakazu Hosokawa

Appendix B.

Nishimatsu Construction Group Procurement Policy

(English translation of the original Japanese text)

Procurement Policy

Nishimatsu Construction “Creates a sustainable society where people can live with peace of mind through valuable buildings and services.” Based on our corporate philosophy, we engage in procurement activities together with our customers based on the "Procurement Policy" set out below.

1. Compliance with laws and social norms

- We comply with laws and social norms, both domestically and internationally.

2. Fair and just transactions

- As equal partners, we promote fair and impartial transactions, and select business partners based on quality, safety, and
- We perform a comprehensive evaluation of performance, price, delivery date, technical capabilities, business conditions, environmental impact reduction, etc.

3. Respect for human rights

- We respect individuality and human rights and strive to ensure appropriate working conditions.

4. Promotion of safety and hygiene

- In accordance with our basic safety and health policy, we maintain a safe, healthy and comfortable working environment and prevent occupational accidents.

5. Initiatives for environmental conservation

- In accordance with our environmental policy, we will protect the natural environment and strive to reduce our environmental impact.

6. Ensuring and improving quality

- We strive to ensure and improve quality in accordance with our quality policy.

7. Thorough information security and information disclosure

- Whether inside or outside the company, we must comply with confidentiality obligations regarding confidential information obtained through procurement activities.
- On the other hand, we will provide and disclose necessary information to stakeholders in a timely and appropriate manner under the confidentiality obligation.

8. Initiatives in social contribution activities

- We deeply recognise that our corporate activities are closely connected to local communities, and we contribute to the development of society and local economy.

9. Continuation of business activities in the event of a disaster

- We establish a management system in order to contribute to the business continuity of the national, local, and corporate sectors in the event of a large-scale disaster.

Date of enactment: March 1, 2023

Nishimatsu Construction Co., Ltd.

Representative Director and President

Masakazu Hosokawa

Appendix C.

Nishimatsu Construction Group Procurement Guidelines

(English translation of the original Japanese text)

Procurement Guidelines

Nishimatsu Construction has established a "Procurement Policy" based on its "Corporate Philosophy" and "Code of Conduct," and is committed to promoting procurement activities that take CSR (Corporate Social Responsibility) into consideration. We believe that it is important for us to work together with our business partners throughout the supply chain in order to promote sound business activities. We ask that our business partners understand our "Procurement Policy" and cooperate in actively working on the following items.

1. Compliance with laws and social norms

We ask that all of our business partners comply with all laws and social norms in every country and region where they conduct business activities.

- Thorough compliance
- Compliance with relevant laws and regulations, including the Construction Business Act, and compliance with guidance from supervisory authorities based on these laws and regulations.
- Prohibition of bribery and illegal political donations
- Prohibition of abuse of superior position
- Prohibition of inappropriate provision and receipt of benefits
- Severance of relationships with anti-social forces

2. Fair and just transactions

We request that you select business partners based on fair and impartial evaluations of factors such as price, certainty of delivery, technical capabilities, financial standing, safety, quality, and environmental considerations.

- Realization of fair and impartial competition
- Provision of fair business opportunities and information
- Transactions on an equal footing

3. Respect for human rights

We ask that you, our business partners, strive to implement the following human rights initiatives in your business activities:

- Respect the human rights of employees, pay attention to appropriate working hour management and securing holidays and vacations, and realize a workplace environment where they can work in a healthy and safe manner.
- Respect human dignity and diversity, prohibit discrimination based on gender, race, nationality, age, religion, disability, marital status, physical characteristics, sexual orientation, etc., acts that infringe on human rights and cause mental and physical pain, such as harassment, and all discriminatory speech and behaviour.
- Prohibit unfair labour practices such as child labour and forced labour.

4. Promotion of safety and hygiene

We ask that you strive to ensure a safe and comfortable workplace environment with consideration for occupational safety and health.

- Maintaining high occupational safety and health standards
- Preventing occupational accidents and incidents
- Appropriate health management for your own employees
- Development of a safe, sound, and comfortable workplace environment

5. Initiatives for environmental conservation

We request that you actively engage in business activities that are environmentally conscious.

- Implementation of activities to reduce environmental impact
- Reduction of greenhouse gas emissions
- Active engagement in biodiversity conservation
- Promotion of waste reduction and recycling
- Compliance with environmental laws and regulations, and establishment, maintenance, and improvement of environmental management systems

6. Ensuring and improving quality

We ask that you strive to further improve the quality assurance of construction, products, and services in order to realize the highest level of customer satisfaction.

- Implementation of a quality management system
- Stable supply of materials and labour, and adherence to delivery and construction schedules
- Improvement of construction technology and promotion of technological development.

7. Thorough information security and information disclosure

We ask that you thoroughly manage and protect confidential information, personal information, and customer information handled in connection with your business, and strive to ensure information security.

- Prevention of leakage of information obtained in the course of business, such as confidential information and trade secrets
- Strict management of personal information and establishment of preventive measures against leakage, theft, alteration, destruction, etc.
- Prevention of infringement of intellectual property rights, etc.
- Timely and appropriate disclosure of company information to stakeholders

8. Initiatives in social contribution activities

We request your cooperation in participating in social contribution activities.

- Promotion of social contribution activities to local communities using management resources
- Active participation in our activities, such as cleaning activities around work sites

9. Continuation of business activities in the event of a disaster

In the event of a large-scale disaster or accident, we request your cooperation in maintaining supply continuity while sharing supply chain information, including your business partners, and that you establish an emergency risk management system.

- Responding to emergency support requests and supplying materials and equipment in the event of a large-scale disaster, etc.
- Developing a business continuity system in anticipation of emergencies such as large-scale disasters.

Date of enactment: March 1, 2023
Nishimatsu Construction Co., Ltd.
Representative Director and President
Masakazu Hosokawa

現代奴隷報告書 2024 年度

西松建設株式会社

1. 報告対象事業体

西松建設株式会社（以下、「当社」、「西松」または「私達」と称します）は、日本で設立された企業であり、2021 年 12 月 17 日にオーストラリア会社法 2001 に基づき外国企業として登録されています（オーストラリア事業者番号：ABN 86 655 449 808）。

2. 報告対象企業の構造、事業内容、サプライチェーン**2.1 当社の組織体制と事業内容**

西松は日本の大手ゼネラルコントラクターの 1 社で、東京に本社を置き、日本全国に地域本部や支店を展開しています。当社は、土木建設、建築建設、不動産・エネルギー・環境、国際の 5 つの主要部門で事業を展開しています。当社は主に日本国内で建設プロジェクトを行っていますが、シンガポール、香港、マレーシア、タイ、ベトナム、バングラデシュ、フィリピンでも建設プロジェクトを手掛けています。さらに、不動産開発事業とインフラ投資は日本以外にも、米国、オーストラリア、シンガポール、タイ、台湾、ベトナムにも広がっています。現在、当社は国内で約 2,705 人、海外（オーストラリアを含む）で約 360 人の専門技術スタッフを雇用しています。当社の主要な子会社は以下の通りです。

西松地所株式会社（東京都港区）

西松アセットマネジメント株式会社（東京都港区）

タイ西松建設株式会社（タイ）

西松ベトナム株式会社（ベトナム）

Nishimatsu Real Estate & Development Asia Pte. Ltd.（シンガポール）

Bangkok Sathorn Hotel Management Co., Ltd.（タイ）

2.2 オーストラリアにおける事業

当社はオーストラリアでの投資機会を積極的に探索しており、再生可能エネルギープロジェクトの開発（建設や出資）や不動産事業に注力しています。2023 年 11 月には、シンガポールに拠点を置く子会社 Nishimatsu Real Estate & Development (Asia) Pte. Ltd.を通じて、オーストラリアの不動産運用会社とパートナーシップを組んで設立した不動産ファンドに投資しました。ファンドの資産は、シドニーの大規模な複合開発プロジェクトを中心としています。その後、2024 年 4 月には、クイーンズランドで実施されている PPP プロジェクトの特別目的会社（SPC）に投資する企業の株式を取得し、間接的にそのプロジェクトに関与することとなりました。当該 PPP プロジェクトの SPC は 2021 年から毎年「現代奴隷制に関する声明書」を公表しています。2024 年度は、当社がオーストラリアで建設プロジェ

クトを手掛けることはありませんでした。

2.3 サプライチェーンの概要

当社のサプライチェーンは建設業の性質上、非常に広範囲かつ複雑です。建設プロジェクトを完遂するために必要な資材、機材、サービスを提供する多数のサプライヤー、サブコントラクター、その他のパートナー企業から成り立っています。当社は、サプライチェーンパートナーとの堅固な関係構築に力を入れ、協調的なアプローチによる高品質なプロジェクト遂行を目指しています。当社は各国でサプライチェーンを構築しており、必要な資材、機材、サービスは主に現地調達しています。ただし、国内調達が困難な場合は海外からの調達も行っています。当社は、健全な事業活動を継続するためには、サプライチェーン全体でパートナーシップを築くことが重要であると認識しています。そのため、「企業理念」および「行動規範」に基づいて「調達方針」を定め、CSR に配慮した調達活動の推進に取り組んでいます。調達方針は9つの条項から成り、その中の第1条では国内外の法令や社会規範の遵守を、第3条では個性と人権の尊重および適切な労働条件の確保に努めることを宣言しています。また、2024年3月29日に、サプライチェーンパートナーをはじめとする価値共創企業との協力と共生を通じた持続可能なパートナーシップの構築を宣言する「パートナーシップ構築宣言」を発出しました。さらに、2011年に西松建設協力会（通称 N-Net）を設立し、会員企業の相互繁栄と連帯を促進しています。N-Net を通じた会員企業との協働により、技術力の向上、コスト削減、情報交換、コンプライアンス研修の提供などに取り組み、参加企業の成長と業績向上に寄与しています。2025年3月31日現在、N-Net の会員企業数は1,023社に達しています。

3. 事業および供給網における現代奴隷制のリスク

オーストラリアの現代奴隷法 2018（以下、「法」）では、現代奴隷には人身売買、奴隷制、農奴制、強制結婚、強制労働、債務労働、労働または役務のための欺罔的な募集、児童の最悪の形態の搾取の8つの重大な搾取が含まれると定義されています。児童の最悪の形態の搾取とは、児童が奴隷制やそれに類する慣行に従事させられる状況、または危険有害な労働に従事させられる状況をいいます。一般的に、建設業は現代奴隷のリスクが高い業界の1つと広く認識されています。その理由は以下のようなファクターによるものです。

複雑なサプライチェーン: 建設プロジェクトには通常、多層のサブコントラクターが関与する複雑なサプライチェーンが存在し、資材や労働力の出所を追跡することが困難。

重層的な請負構造: 元請と下請の慣行により、雇用関係が不明確になり、搾取の機会が生まれる。

外国人労働者への依存: 建設業は外国人労働者に大きく依存しており、言語の壁、不安定な移民身分、法的保護への限られたアクセスなどから搾取されやすい。

労働集約的な性質: 建設工事の労働集約的な性質から、コスト削減の圧力が生まれ、労働者の搾取につながる可能性がある。

当社は日本、アジア、オーストラリア、米国で建設事業と不動産事業を展開しており、日本とアジアの建設事業において現代奴隷のリスクがあると認識しています（2024 年度は、オーストラリアと米国での建設プロジェクトは行っていません）。

日本

外国人労働者: 日本の建設業は外国人労働者に依存しており、以下の要因から搾取のリスクがある。

採用手数料による債務労働

パスポートの預かり

不公正な契約と賃金格差

劣悪な居住環境

下請構造: 重層的な下請構造により、労働慣行の監視が困難で、強制労働やその他の虐待が隠れてしまう可能性がある。

アジア（バングラデシュ、香港、ラオス、マレーシア、フィリピン、シンガポール、ベトナム）

強制労働: 以下のような分野での強制労働のリスクが知られている。

砂、砂利などの鉱物採掘、木材伐採、建設資材の製造

児童労働: レンガ、タイルなどの製造現場で児童労働が存在する可能性がある。

脆弱な移民労働者: 隣国からの移民労働者は、書類の不備、言語の壁、国外追放の恐怖から搾取されやすい。

また、当社の事業全般にわたって以下のようなサプライチェーンリスクも認識しています。

原材料: ガバナンスの脆弱な地域からの木材、鉱物、骨材の調達には、強制労働、土地収奪、環境破壊のリスクがある。

製造: 鉄鋼、セメントなどの建設部材の製造現場では、劣悪な労働条件や労働者の権利侵害が起こる可能性がある。

4. 現代奴隷リスクの評価と対応策

4.1 人権方針

西松建設グループ（以下「当グループ」）は、「安全で快適な建物と価値あるサービスを通じて持続可能な社会を創造する」という社会的使命の下、企業活動を行っています。この理念を実現するためには、事業に関わるすべての人々の基本的人権を尊重することが不可欠であると考え、国連「ビジネスと人権に関する指導原則」に基づき、西松建設グループ人権方

針を策定しました。

当グループのウェブサイトをご参照ください。人権方針の英訳版は付録 A に記載しています。 <https://www.nishimatsu.co.jp/company/policies.html>

4.2 調達方針と調達ガイドライン

また、当グループは、企業理念およびコンプライアンス規程に基づき、調達方針と調達ガイドラインを定めています。パートナー企業の理解と積極的な支援を得ながら、サプライチェーン全体での協働により、社会的責任を果たし、持続可能な社会の実現に取り組んでいます。

調達方針

- | | | |
|---------------|---------------|---------------------|
| 1. 法令・社会規範の遵守 | 4. 安全・衛生の推進 | 7. 情報セキュリティの徹底と情報開示 |
| 2. 公平・公正な取引 | 5. 環境保全への取り組み | 8. 社会貢献活動への取り組み |
| 3. 人権の尊重 | 6. 品質の確保と向上 | 9. 災害時における事業活動の継続 |

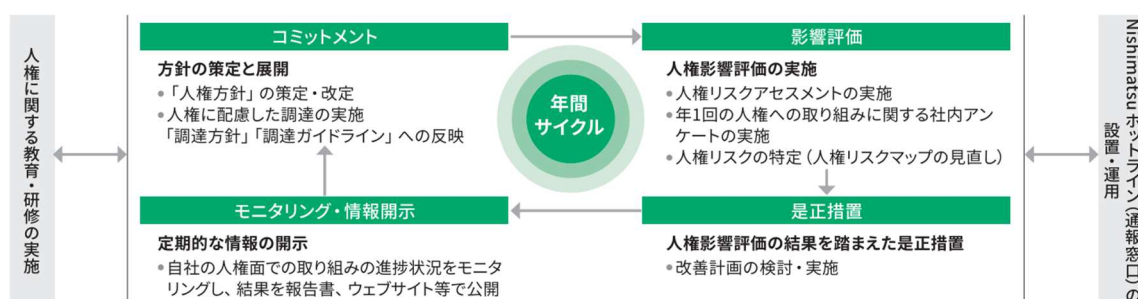
当グループのウェブサイトをご参照ください。調達方針と調達ガイドラインの英訳版は付録 B および C に記載しています。 <https://www.nishimatsu.co.jp/company/policies.html>

4.3 人権デューデリジェンスプロセス

当グループは、国連「ビジネスと人権に関する指導原則」に基づき、人権デューデリジェンスシステムを構築しています。これは、当社の人権コミットメント（当グループの人権方針）に基づき、グループバリューチェーンにおける人権課題の特定・評価から、是正措置の計画・実施・モニタリング、そして外部ステークホルダーとのコミュニケーションまでを継続的に実施するプロセスです。当社が社会に与える負の影響を継続的に防止・軽減していくため、このプロセス全体を循環させていきます。

(1) 人権リスク（負の影響）の特定・評価 (2) 当社のリスク管理システムへの統合と適切な対応措置の実施 (3) 措置の有効性のフォローアップ調査 (4) 情報開示

人権デューデリジェンスプロセス



2024年度は、主要なビジネスパートナーの約50%を対象に人権デューデリジェンスを実施

し、そのうち 5%の企業に高い人権リスクが存在することを特定しました。2025 年度は、これらの企業に対してヒアリングを行い、事実関係の確認、必要に応じて改善措置の促進、改善状況のモニタリングを行う予定です。

5. 講じた対応策の有効性の評価

2023 年 4 月、当社は「サステナビリティ委員会」と「リスク・機会マネジメント委員会」を設置し、サステナビリティ推進体制を構築しました。

サステナビリティ委員会は、社内外の有識者で構成され、取締役会からの諮問に基づき、長期的・マルチステークホルダー視点からのマテリアリティの検討や、マテリアリティに関連する環境変化（リスクと機会）への対応方針の審議を行い、取締役会に報告しています。

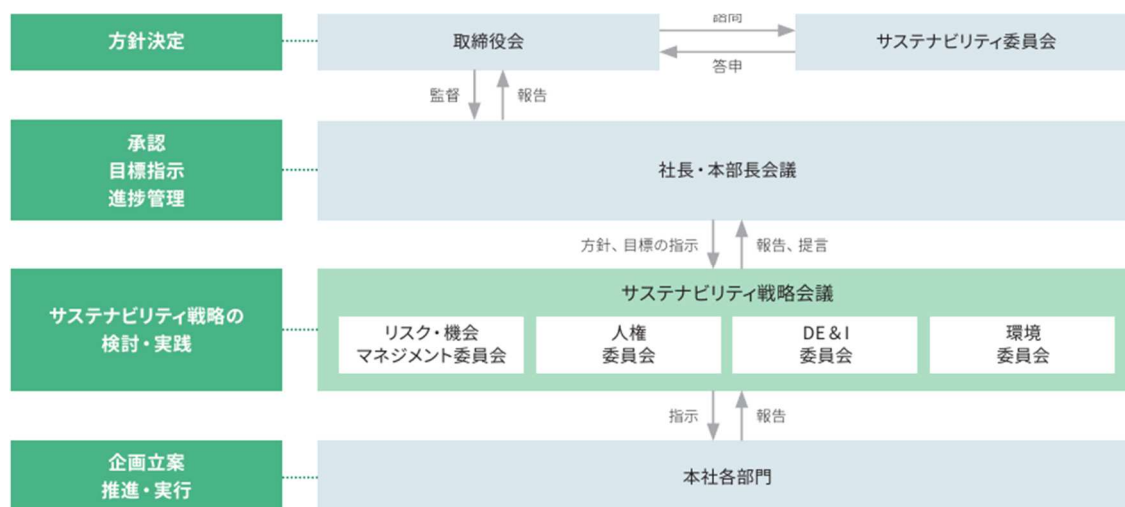
また、上記の委員会の取り組みに加え、サステナビリティ委員会では、定量的なサステナビリティKGI(Key Goal Indicator)の設定や中長期的なリスクの特定などについても審議し、取締役会に報告しています。

5.1 サステナビリティ推進体制

当社は、マテリアリティ課題の解決と持続可能な社会の実現に向けたサステナビリティ戦略を検討・実行するため、「サステナビリティ戦略会議」を設置しました。併せて、同会議の下に重要領域ごとに「リスク・機会マネジメント委員会」「人権委員会」「DE&I 委員会」「環境委員会」の 4 つの委員会を設置し、それぞれに委員長と事務局を置きました。

サステナビリティ戦略会議は、各事業部門の次長クラスや各戦略室の代表者を中心に構成されており、これら 4 つの委員会を統括し、その状況を社長・本部長会議に報告します。サステナビリティ戦略会議（4 つの委員会を含む）が当社のサステナビリティ戦略の中心となり、新しい視点を取り入れながら、サステナビリティの推進に積極的に取り組んでいきます。

サステナビリティ推進体制



5.2 人権委員会

サステナビリティ戦略会議の中に人権委員会を設置しています。人権委員会は、当社の人権方針に基づき、社内外のステークホルダーに向けた取り組みを推進しており、サプライチェーンにおける人権デューデリジェンスなども行っています。

人権委員会は、人権リスクおよび現代奴隷リスクへの対応策の有効性を毎年評価し、当社の対応力の向上に取り組んでいます。

6. 報告書の承認

本声明は 2025 年 7 月 31 日の取締役会で承認されました。

2025 年 8 月 1 日

西松建設株式会社 代表取締役社長 細川 雅一

付録 A. 西松建設グループ人権方針

付録 B. 西松建設グループ調達方針

付録 C. 西松建設グループ調達ガイドライン