

TAKENAKA Europe GmbH

Modern Slavery Statement 2025

Introduction

Takenaka Europe GmbH (also referred to as 'we', 'our' or 'us') is committed to ensure due diligence of human rights and we recognize the global prevalence of modern slavery - acknowledging our responsibility to take action. Our company maintains a zero-tolerance approach to any form of exploitation, including forced labour, child labour, and human trafficking.

This statement is published pursuant to Section 54 of the UK Modern Slavery Act 2015 and outlines our efforts to prevent and address these issues within our operations and supply chains for the financial year ending 31 December 2024.

We are dedicated to continuously improving our practices and working collaboratively with our stakeholders to promote ethical business conduct and respect for human rights. This statement serves as a testament to our ongoing commitment to transparency and accountability in our efforts.

1. Organisation structure, its business and supply chains

We are an architectural, engineering and construction services company that operates within the construction industry sector. Since 1973 TAKENAKA Europe GmbH (Gesellschaft mit beschränkter Haftung - German for 'limited liability company') is the European headquarters of Takenaka Corporation which is one of Japan's largest general contractors. We are located in Dusseldorf, Germany, serving as operational functions, covers and controls 13 country-branches in Europe: The United Kingdom (UK Branch of TAKENAKA Europe GmbH), Germany, The Netherlands, Spain, Italy, France, Belgium, Czech Republic, Poland, Slovakia, Hungary, Romania and Serbia with more than 600 employees.

Supply chain understanding

We recognise that it is crucial for us as an organisation to have oversight of our supply chains so that we can understand the risks of modern slavery along the chain and take action to mitigate against those risks.

Our supply chains

Our business is built around delivering construction projects through the support of a wide range of subcontractors and service providers. Currently we are considering internal governance activities to map due diligence at our subcontractors.

2. Our corporate policies

As a global commercial organisation, we are honor bound to make our organisation transparent and accountable in the area of human rights to the public at large as well as interested parties including investors, employees, consumers, and business partners. We recognize our responsibility to ensure that our businesses and supply chains are free from slavery and human trafficking. Our approach to anti-slavery and human trafficking clearly sets out our commitment to acting ethically and with integrity in all our business relationships as well as our adopted policies.

The Takenaka Group's CSR Vision¹ guides our approach to corporate social responsibility as: 'We, the Takenaka Group, will enhance dialog with stakeholders, turn those dreams into reality through urban creation, and connect a sustainable society to the future'. This is reflected in all our award winning works in various countries.

Through our long-standing history of over 400 years (over 50 years in Europe) we have developed detailed company policies to ensure proper and common understanding of related topics. These policies are also being updated and revised from time to time to be relevant to the current age.

Operating policies

We follow our Corporate Code of Conduct and Policies². Its reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls aiming to ensure slavery and human trafficking is not taking place in our supply chains. We have the following policies in place relevant to modern slavery and human rights, which we continuously review and update:

- Human Rights Policy³ – the policy prohibits modern slavery in line with International Bill of Human Rights (the declaration and the bill), the International Labor Organization's ILO Declaration on Fundamental Principles and Rights at Work, and the United Nations' Guiding Principles on Business and Human Rights. Takenaka promotes mutual understanding and respect so that there is no unfair treatment such as discrimination or harassment regardless of race, gender, religion, gender identity, disability, and other similar factors and realise a healthy and rewarding work environment.
- Modern Slavery & Illegal Workers Policy – This document sets out our commitment to compliance with the Modern Slavery Act 2015 and the company's commitment to preventing slavery, human trafficking and illegal workers in our business activities. This policy also details the steps we have put in place with the aim of ensuring that there is no slavery, human trafficking or illegal workers in our own business and supply chains. We

¹ Source: https://www.takenaka.co.jp/takenaka_e/sustainability/vision/

² Source: https://www.takenaka.co.jp/takenaka_e/about/policy/index.html

³ Source: https://www.takenaka.co.jp/takenaka_e/about/HumanRightsPolicy/

all have a duty to be alert to risk, however small. The staff are expected to report on their concerns and management is expected to act upon them.

- **Safety & Health Policy** – It ensures occupational safety and welfare of each employee as well as making available an overarching HSE (Health Safety and Environment) management process based on our quality assurance system.
- **Quality Policy** – It ensures consistent quality throughout our value chain.
- **Environmental Policy** – It ensures forward thinking adherence to laws, regulations and internal rules related to environmental preservation.
- **Procurement Policy** - It promotes mutual understanding and respect to avoid unfair treatment, such as harassment and discrimination based on race, gender, gender identity, religion, disability, and so on. The aim is to create healthy environments where it is easy to work.

3. Due diligence process for slavery and human trafficking

We are currently working-in-progress to meticulously conduct due diligence, proactively assess risks, identify potential threats and craft robust mitigation strategies.

Due Diligence, prevention and mitigation

TAKENAKA EUROPE GmbH wants to ensure that its own workforce, as well as that of its supply chain operating on its projects is free from modern slavery. The company undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. The Company's due diligence process includes the building of long-standing relationships with suppliers and making clear our expectations of business partners, evaluating the modern slavery and human trafficking risks of each new suppliers and/or invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

We strive for measurable results and optimized processes that could be managed sustainably and long-term with special value attached to consistency and continuous improvement, updating of processes as per the changing times. We will work in partnership with our subcontractors and suppliers to tackle and combat the treatment of modern slavery and human trafficking across the construction industry and throughout our supply chain, in accordance with international environmental, social and ethics standards.

Grievance mechanisms

We have set up an independent whistleblowing helpline to report any kind of suspicious behaviour or raise concerns about safeguarding human rights. This helpline has been

officially communicated to all our employees and non-employee members through internal circulars. In addition, we provide a whistleblower system on our website⁴ which allows general access to communication in many official languages. The independent structure of whistleblowing further ensures that those who report remain anonymous and do not suffer from consequences relating to their report.

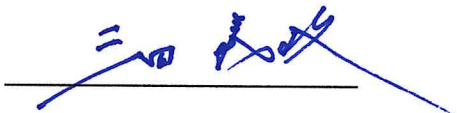
4. Training in modern slavery and trafficking

To ensure a high level of understanding of the risks associated with modern slavery and human trafficking and illegal workers in our supply chains and our business, we provide training presentation to our staff members within the first 2 months of employment. We also encourage our business partners to provide training to their staff and suppliers and providers.

5. Looking forward to the future

In accordance with our values, we take the steps to ensure that modern slavery and human trafficking do not have the ability to arise in our own businesses and global supply chains. We will continue to build positively on the work already in place to combat the risk of modern slavery in our sectors and will take further steps as we deem necessary to effect improvements.

This statement is published pursuant to Section 54 of the UK Modern Slavery Act 2015 and was approved by the Board of Directors on 19 June, 2026.



Yoshimasa Mita

President Takenaka Europe GmbH

⁴ URL link to Whistleblower Policy: <https://takenaka-europe.hinweisgeber-expertemeldeplattform.de/en>