

Modern Slavery Statement

Financial Year 2024/2025

McNab Developments (QLD) Pty Ltd
ABN 63 118 748 548



 safety first quality always


mcnab

FOREWORD

Kunjan Ganatra, Chief Executive Officer

At McNab, how we achieve results matters just as much as the results themselves. As a people-first construction business, we are committed to upholding dignity, fairness, and respect for every person connected to our operations and supply chain. Modern slavery in any form is incompatible with our values and with the standards we expect of ourselves and our partners.

The construction industry is part of a global supply chain that is complex, fast-moving, and at times vulnerable to exploitation. This is why we continue to strengthen our framework, improve visibility across suppliers, and invest in systems, training and governance that help us to identify, assess, and address modern slavery risks.

Over the past year, we have further enhanced our subcontractor due diligence processes, expanded our international oversight, and increased education for our people and supply chain partners. We have also continued to work on our broader ESG Strategy, ensuring that human rights, ethical procurement, and sustainability remain central to how we operate.

Whilst we are proud of our progress, we acknowledge that is an ongoing commitment – one that requires vigilance, transparency, and collaboration. We remain steadfast in our responsibility to influence positive change and ensure that our operations, and those connected to us, uphold the highest ethical and human rights standards.

Thank you to our people, partners, and suppliers who continue to support this important work. Together, we are contributing to a more responsible and ethical construction industry.



Kunjan Ganatra
Chief Executive Officer
McNab Group

OUR GROUP VISION

To build the best relationships, so that we enrich peoples lives.

OUR VALUES

They define us and make us legendary.



Safety First

We plan ahead. We never walk past a single safety issue.



Care

We genuinely care about our people, clients and subbies. We build relationships based on respect for ourselves and others.



Passion

We love what we do and have fun doing it. We're curious and nimble.



Growth

We don't do comfort zones. We really listen and rely on feedback.



Response-able

Working together, we make the impossible possible. We own our mistakes and our successes.

OUR BRAND PROMISE

We **genuinely care.** We **make it easy.** We **deliver certainty.**

A zero-tolerance approach to modern slavery

This Modern Slavery Statement has been prepared by McNab Developments (QLD) Pty Ltd (the reporting entity) for the financial year ending 30 June 2025, in accordance with the requirements of the Modern Slavery Act 2018 (Cth).

This statement outlines the steps taken by McNab Developments (QLD) Pty Ltd (McNab DevQ) to identify, assess, and address modern slavery risks within its operations and support chain. While this statement refers to associated entities within the broader McNab Group for contextual purposes, it applies only to McNab DevQ.

Reporting entity

McNab DevQ is a privately owned Queensland-based construction company operating across South East Queensland and New South Wales.

For the purpose of the Act, McNab Developments (QLD) Pty Ltd is the only McNab Group entity that meets the reporting threshold for consolidated revenue of at least \$100 million for the reporting period.

The principal governing body of McNab DevQ is the sole director and secretary, Mr Michael Jon McNab.

Our structure

McNab DevQ forms part of a wider group of associated companies that operate under the McNab brand (the McNab Group). These associated entities include:

- McNab Employee Holdings Pty Ltd
- McNab NQ Pty Ltd
- Minor Works Pty Ltd
- Supplyhaus Pty Ltd
- Electrorig Rentals (Australia) Pty Ltd

Whilst the associated entities support the delivery of construction, manufacturing, hire and supply services, McNab DevQ does not own or control these entities.

Nevertheless, all entities in the McNab Group operate under a shared management structure with centralised governance processes, allowing for aligned risk management practices, consistent policy deployment, and share due diligence approaches.

Our operations

Established in 1996, McNab DevQ has grown to become one of Queensland's largest privately owned construction companies. The company delivers industrial, commercial, residential, and design-and-construct projects, including developments exceeding \$100 million.

During the reporting period, McNab DevQ employed 318 workers across a diverse range of operational and professional roles, including Project Managers, Engineers, Site Managers, Foremen, Contract Administrators, qualified tradespersons, labourers, apprentices, and cadets.

The broader McNab Group also includes specialist product supply teams and shared corporate services functions, which also support the construction activities of McNab DevQ.

All McNab employees are engaged in accordance with relevant industrial instruments and employment legislation, with employment practices that meet or exceed minimum legal requirements relating to wages, conditions, hours of work, and leave entitlements. These employment conditions significantly reduce the risk of modern slavery within our direct workforce.

Our supply chain

McNab DevQ engages a large network of subcontractors, suppliers, and consultants to deliver projects. Our supply chain includes:

- Local subcontractors and trade partners
- Labour-hire providers
- Australian suppliers of construction materials
- Overseas manufacturers and product suppliers

Through Supplyhaus Pty Ltd and other procurement pathways, McNab DevQ sources materials both locally and internationally, including from regions identified by the Global Slavery Index as having heightened human rights risks.

Key overseas procurement regions include:

- China
- Vietnam
- Philippines

These regions present elevated risks of forced labour, debt bondage, child labour, and exploitation due to variable labour standards, cultural norms, and regulatory oversight.

Modern slavery risk in our operations and supply chain

Based on our FY24/25 risk assessment, McNab DevQ has identified the following areas of heightened risks:

Local subcontractors and labour-hire providers

Risks include:

- Vulnerability of migrant and visa-dependent workers.
- Inconsistent employment practices within subcontractors' operations.
- Potential for underpayment or excessive working hours.
- Dependency on labour-hire intermediaries.

Overseas suppliers and manufacturers

Risks include:

- Forced labour and debt bondage in manufacturing sectors.
- Child labour in developing countries.
- Limited visibility over multi-tiered supply chains.
- Differing regulatory environments and enforcement capacity.

Indirect supply chain (suppliers to subcontractors)

Risks include:

- Reduced transparency over raw materials and secondary suppliers.
- Fragmented oversight across multiple jurisdictions.

Actions taken to assess and address risk (FY24/25)

McNab DevQ undertook the following actions during the reporting period:

Strength due diligence

- Enhanced subcontractor onboarding processes to include modern slavery declarations.
- Required all subcontractors to comply with modern slavery legislation through updated contract clauses.
- Conducted due diligence on labour-hire arrangements and employment conditions of subcontractor workforces.

Direct overseas procurement controls overseas suppliers and manufacturers

- Continued direct sourcing from overseas factories to improve transparency and reduce reliance on third-party importers.
- Conducted onsite visits to overseas manufacturing facilities to assess working conditions and verify ethical labour practices, supported by multi-level oversight from the Executive Chairman and CEO through to the Head of Supply and operational staff.

Education and awareness

- Delivered mandatory modern slavery eLearning modules to all McNab employees.
- Distributed educational materials to subcontractors as part of project start-up packs.
- Facilitated discussions at subcontractor award meetings to build understanding of risks and obligations.

Complaints and reporting mechanisms

- Maintained multiple channels for raising grievances, including:
 - People & Culture team.
 - Site leadership teams.
 - Anonymous whistleblower hotline.
 - Safety team and executive leaders.
- Investigated concerns using internal and third-party expertise where required.

Assessing the effectiveness of our action

McNab DevQ measures the effectiveness of our risk-mitigation efforts through:

- Completion rates and comprehension results of employee eLearning modules.
- Outcomes of subcontractor due diligence reviews.
- Results from international supplier audits and onsite inspections.
- Monitoring grievances, reports, and whistleblower disclosures.
- Internal leadership reviews of modern slavery risk data and actions.
- Annual review by the McNab Executive Group.
- Biannual analysis of supply chain data, contractor submissions, and risk trends.

These measures help identify gaps, monitor progress, and inform continuous improvement.

Consultation

McNab DevQ does not own or control other entities. However, to ensure alignment and consistency across the broader McNab Group, consultation occurred through:

- Shared management and governance structures.
- Cross-functional engagement with the People & Culture, Safety, Procurement, and Finance teams.
- Regular communication with group executives and key stakeholders.
- Engagement with associated entities to inform group-wide awareness and shared risk understanding.

This approach supports a consistent framework for managing modern slavery risks while recognising that only McNab DevQ is a reporting entity for the purposes of this Statement.

Approval

In accordance with section 16(2) of the Modern Slavery Act 2018 (Cth), this Modern Slavery Statement was approved by the principal governing body of McNab Developments (QLD) Pty Ltd.

Signed:

McNab Developments (QLD) Pty Ltd



Michael Jon McNab
Sole Director and Secretary

15 December 2025

Future commitments (FY25-27)

McNab DevQ will continue to:

- Strengthen risk assessment tools and risk registers for use in overseas supplier inspections.
- Deepen engagement with subcontractors and suppliers to build capability and awareness.
- Expand international supplier monitoring and due diligence.
- Improve data capture and reporting to track risk indicators and supplier performance.
- Embed modern slavery awareness into onboarding, procurement, and contract management processes.
- Continue implementing ESG initiatives that support ethical sourcing and human rights protections.

Commitment to continuous improvement

McNab DevQ acknowledges that combating modern slavery requires ongoing vigilance, collaboration, and improvement. We remain committed to:

- Ongoing education and awareness across all employees and third parties.
- Rigorous monitoring of subcontractors and suppliers.
- Regular policy and procedure updates.
- Transparent reporting and ethical standards.
- Strengthening long-term partnerships with suppliers who share our commitment to human rights.

