



ABOUT THIS STATEMENT

This statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) by the reporting entity BGIS Pty Ltd (ABN: 83 064 638 197) and its subsidiaries (collectively “BGIS”) for the year ended 31 December 2024.

BGIS Pty Ltd makes this single joint statement on behalf of all 100% owned and controlled entities. BGIS acquired Hix Group Pty Ltd during 2024, which falls outside the reporting period of this Modern Slavery Statement and this entity will be included in future statements.

BGIS holds a 49% interest in Bennelong Energy Services Pty Ltd. This entity is not a subsidiary of BGIS and therefore is not covered by this statement.

This statement was approved by the board of BGIS Pty Ltd on 20 June 2025.

MODERN SLAVERY

Modern slavery represents a grave violation of human rights and personal dignity. It encompasses exploitative practices such as human trafficking, slavery, servitude, forced labour, debt bondage, and forced marriage—all of which are recognised as serious criminal offences under Australian law.

The Modern Slavery Act 2018 (Cth) came into effect on 1 January 2019. Under the Act, organisations are required to assess and identify potential modern slavery risks within their operations and supply chains, and to outline the actions they are undertaking to address and mitigate these risks.

In alignment with these obligations, BGIS Pty Ltd is pleased to submit this Modern Slavery Statement in accordance with the requirements of the Act.

ABOUT US

BGIS is a leading provider of integrated facilities management and real estate services. Our comprehensive service offering includes facility management, project and construction management, energy and sustainability solutions, asset and building performance management, compliance and workplace management, as well as strategic real estate services.

We partner with clients to optimise the performance, efficiency, and sustainability of their built environments – delivering tailored solutions that align with their operational and strategic goals.

Our talented team of close to 2,400 people in Asia Pacific is supported by a global team of 12,000 people in Canada, USA and the United Kingdom. We deliver to clients in defence, justice, government, education, healthcare, utilities, finance, housing/ social housing, telecommunications, transportation, property, resources, oil & gas and sport & leisure. We manage 50,000 locations, totalling 51 million square metres of office and retail space, universities, schools, hospitals, stadiums, housing, bases, remote towns, warehouses, industrial assets and data centres.

MESSAGE FROM THE MANAGING DIRECTOR

Modern slavery remains a matter of significant concern to BGIS. We are firmly committed to respecting and upholding the human rights of our employees, clients, vendors, and the broader communities in which we

operate. This commitment is embedded in both our corporate policies and the way we conduct our business.



It is with a sense of responsibility that I present BGIS's 2024 Modern Slavery Statement for Australia and New Zealand, prepared in alignment with the reporting obligations set out in the Modern Slavery Act 2018 (Cth). Given the breadth and complexity of our vendor network, we acknowledge the potential for indirect exposure to modern slavery risks. This statement provides a structured framework to support the identification and management of those risks within our operations and extended supply chains.

To date, BGIS has not identified any incidents of modern slavery within our business or supply network. Nonetheless, we are committed to taking proactive measures to mitigate potential risks. Our approach is grounded in a strong governance framework that promotes continuous risk assessment and enhances supply chain transparency.

We recognise that addressing modern slavery requires sustained effort and vigilance. Accordingly, BGIS remains dedicated to evolving and strengthening our practices to ensure we can effectively identify, manage, and report modern slavery risks, both for our organisation and on behalf of our clients. Through these efforts, we aim to contribute meaningfully to enduring and impactful change.

A handwritten signature in dark ink, appearing to read 'Dana', followed by a long horizontal line.

Dana Nelson

President and Managing Director – APAC

OUR SUPPLY CHAIN

Australian and New Zealand suppliers constitute 98% of the 2024 active BGIS Pty Ltd supply chain (and over 99% of the spend), with the remaining vendors located internationally. The Australian supply chain constitutes 90% of the total value of all purchases made by BGIS Pty Ltd.



CATEGORY CHARACTERISTICS

Facilities Management Services

This group of suppliers represents around half of the BGIS supply chain, both in spend and supplier volume.

Services provided by these vendors primarily include labour based services of: cleaning, security services, grounds maintenance, air conditioning maintenance, electrical maintenance, hydraulic maintenance and fire systems maintenance.

Industrial Consumables, Plant Hire & Equipment

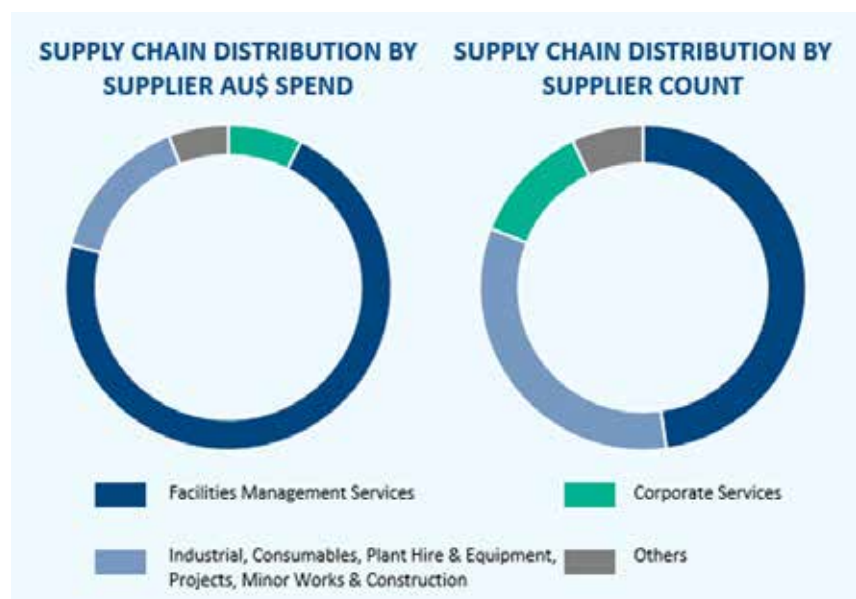
This category includes: industrial consumables and tools of trade, uniforms, PPE & safety equipment, catering / kitchen & laundry equipment, furniture and temporary plant hire.

Projects, Minor Works & Construction

Minor works and construction activities include: demolition and construction, building fabric and carpentry, civil works, electrical systems, flooring supply and installation, roofing & guttering and professional project management services.

Corporate Services

This area of our operations includes key corporate items including: travel & accommodation, IT software and equipment, telephony, stationery and professional services such as finance, legal and other consultants.



MODERN SLAVERY RISKS

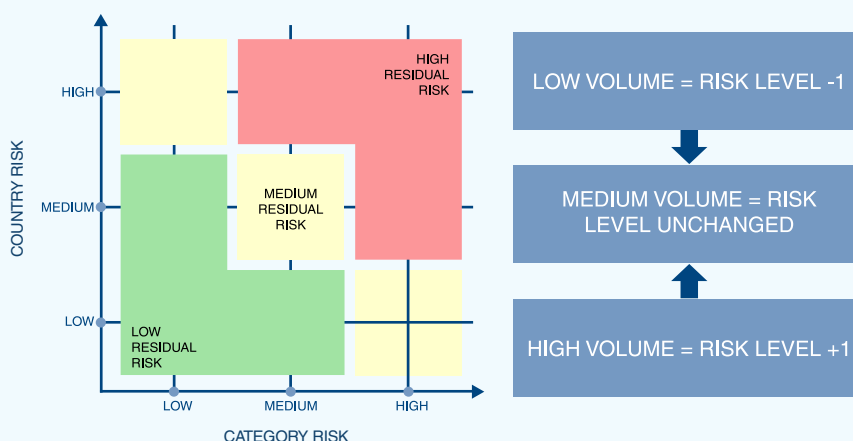
BGIS Pty Ltd operations are primarily Australian based, which has a low inherent risk profile of modern slavery vulnerability. The highest concentration of modern slavery risk in our operations is within our supply chains, which are predominately labour based (see above 'Our Supply Chain') and international vendors. In 2024, BGIS reviewed its supply chain using a risk assessment and tiering model outlined below.

BGIS completed a risk assessment of its vulnerability to modern slavery practices in its supply chain based on the following:

- Country Slavery Risk/Global
- Slavery Indexation
- Industry & Category Risk
- Volume Risk

The assessments were graded along a matrix and resulted in the application of a residual Low / Medium / High ranking for each vendor. The rankings then determine the audit and compliance activities that were to be conducted by BGIS with each tier of supplier (see below 'Our Actions').

Country and Category risks are first assessed, with residual risk ratings per the diagram above. BGIS volumes are then considered with Low volumes, reducing the residual risk rating by one tier and High volumes increasing the residual risk rating by one tier.



Global Slavery Index

BGIS identifies modern slavery country risk using the Global Slavery Index published by the Minderoo Foundation Pty Ltd 'Walk Free' human rights group*. The Walk Free Global Slavery Index (2023) is the world's most comprehensive data set of modern slavery and uses prevalence estimation techniques including nationally representative surveys, and multi-level risk model extrapolation to measure modern slavery globally. The index also assesses government responses to this issue and vulnerability structures that impact populations around the world.

BGIS applies a weighted methodology that leverages the GSI material based on the following:

- Prevalence of population in modern slavery (50%);
- Population Vulnerability (25%); and
- Government response (25%)

The resulting weighted scores are then graded to provide a residual country risk rating using a Low / Medium / High ranking. These rankings are allocated against the BGIS supply chain to identify modern slavery risk based on country of incorporation.

* <https://www.walkfree.org/global-slavery-index/downloads/>

MODERN SLAVERY RISKS

Category Risk

BGIS procurement maintains an industry segmentation and taxonomy model across the BGIS Pty Ltd supply chain. This taxonomy has been indexed against modern slavery risk using a High / Medium / Low ranking methodology to identify likelihood of modern slavery by activity type.

The indexation is based upon the following industry attributes:

- Prevalence of high staff and employment volumes within the category;
- The relative wages and incomes of the staff employed in a given industry as a measure of
- income disadvantage and exploitation risk;
- The proportion of goods and materials likely to be sourced from 3rd parties and overseas supply chains; and
- Known high risk modern slavery industries such as textiles, electronics, food supply, cleaning and manufacturing.

The category indexation is then attributed against the BGIS supply chain to identify modern slavery risk based on industry of operation.



OUR ACTIONS

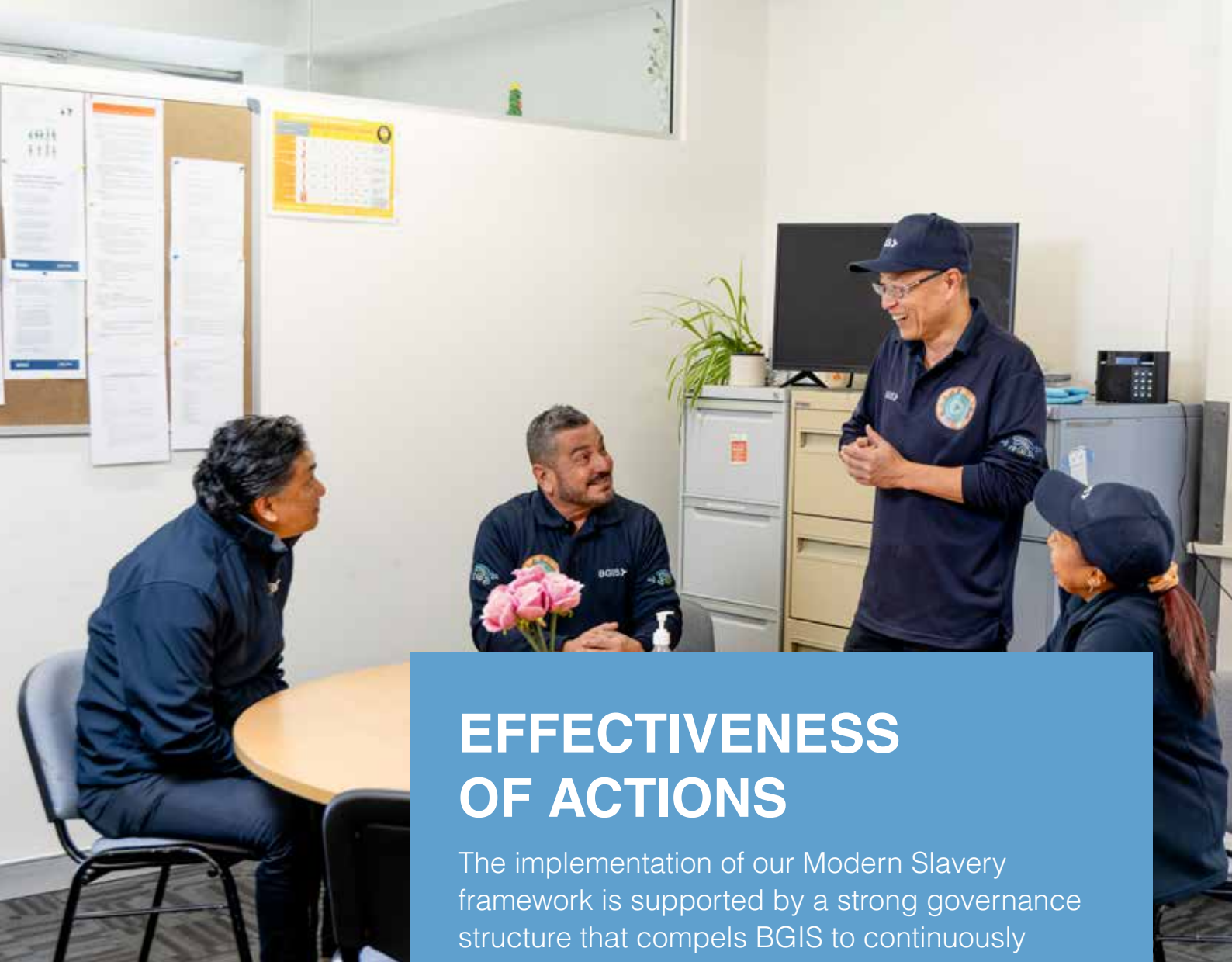
Policy, Procedure and Governance	Our commitments to reducing modern slavery vulnerability in BGIS operations and our supply chain are supported by a cohesive policy, procedural and governance framework.
Code of Business Conduct and Ethics	The Code serves as a guide for staff conduct as a member of the BGIS team. Preserving our corporate culture is vital to the organisation and following the Code helps us do that. All staff receive training and certify their commitment to the Code each year.
Modern Slavery Act Framework	Released in November 2019, the BGIS Modern Slavery Act framework sets out an understanding of the risks and mitigation strategies that BGIS has adopted in meeting its legislative obligations and CSR objectives. The framework identifies appropriate resourcing, staffing and a training agenda to support a strong corporate culture, setting short- and long-term key performance indicators to ensure a transparent and efficient approach to managing modern slavery vulnerability in the BGIS supply chain.
Sustainable Procurement Framework	BGIS procurement has wholly adopted the principles of the ISO 20400 Sustainable Procurement – Guidance in its procurement policy, guidelines, compliance and audit activities and leadership and works toward giving these principles expression in all purchasing activities undertaken by BGIS procurement staff and the broader BGIS business.
Staff Training	BGIS conduct internal online training to improve Modern Slavery awareness amongst all staff that conduct purchasing activities on behalf of the group. A total of 251 of our staff have now completed this training program. This training program is completed by all new and existing staff carrying out purchasing activities for BGIS.
Procurement Policy & Sustainable Procurement Policy	The BGIS Procurement Policy begins with an overview of the BGIS procurement principles: Ethics, Safety & Sustainability. Staff are given an overview of their responsibilities to uphold the BGIS Code of Ethics; our zero-tolerance approach to Bribery and Corruption; our Risk and Safety management policy requirements; and our commitments to Sustainability and the Environment and Supplier Diversity. In 2020, BGIS was proud to release its Sustainable Procurement Policy. The policy is supported by an extended set of purchasing guidelines and checklists that further articulate our approach to Sustainable Procurement in accordance with the ISO 20400 pillars. Key elements of our operating guidance with respect to Sustainable Procurement include business as usual processes that provide continual assessment of: • Organisational Governance • Human Rights • Labour Practices • Environment • Fair Operating Practices • Consumer Issues; and • Community. Tier 2 Subcontracting Guidelines: In 2019, BGIS Procurement released its Tier 2 Subcontracting Guidelines. Alongside this release, a complete audit of the Facilities Management supply chain was completed, designed specifically to provide greater transparency into the BGIS supply chain and any downstream subcontracting practices. We continue to utilise our Subcontracting Guidelines across our operations.

OUR ACTIONS

Vendor Code of Conduct	As a business that delivers services to all of our customers through a network of trusted Vendor partners it is essential that we always behave with unquestioned integrity consistent with our core values. To help our vendors and their employees, agents and sub vendors (collectively referred to as “Vendors”) understand these expectations we outline our commitment and expectations in the Vendor Code of Conduct which is formally acknowledged by all BGIS suppliers. The Code includes ensuring that the human rights of workers is upheld and expressly prohibits forced, bonded, indentured or involuntary labour and enforces compliance with applicable wage laws.
Subcontracts	BGIS has strengthened compliance with laws controls when engaging third parties, with provisions for compliance with the Modern Slavery Act 2018 now part of our standard subcontracting agreements. These provisions also promote BGIS’ rights to audit and verify compliance.
Whistleblower Policy	BGIS are committed to fostering a culture in which team members feel supported to provide feedback, especially if they have concerns about ethical issues in the workplace. Our Integrity 24/7 reporting platform allows staff and suppliers to easily and anonymously communicate any misconduct, or gain clarity on something that may be cause for concern – no matter how big or small. To manage the reporting system, we partner with NAVEX Global, an ethics and compliance company that has gone to great lengths to ensure reports entered in the system are completely confidential. The BGIS Whistleblower Policy aligns with legislative requirements and contains workflow demonstrating how all Integrity 24/7 matters are managed.
Modern Slavery framework, Supplier Due Diligence	BGIS undertook a comprehensive review of its CY24 active supply chain of 4214 vendors in alignment with our Modern Slavery framework objectives. This included: • 3rd party due diligence assessment of the entire supply chain • Extended supplier engagement through Modern Slavery questionnaire assessment for medium risk vendors • Formal supplier auditing for high-risk vendors
Anti-Bribery and Corruption (ABC)	BGIS utilises CreditSafe independent screening of all suppliers providing goods or services to BGIS as part of its anti-bribery and corruption (ABC) due diligence. These reviews are undertaken prior to any new supplier being on-boarded to BGIS procure-to-pay platforms. The CreditSafe screening program is conducted in 2 phases as follows: New Vendors: ‘Level 2 – Intermediate’. These screenings include assessment of: Sanctions / Watch lists / Politically Exposed Persons and Adverse Media relating to: Entity name, Legal names, Principal names, Related Parties and Global Parent. An adverse finding or ‘red flag’ surfaced during this process may result in a vendor being rejected by BGIS or a formal review and acceptance process completed with endorsements obtained by BGIS Managing Director prior to accepting any risk(s) identified. Annual Review: All BGIS vendors are annually re-screened against the CreditSafe databases to ensure that their company standing has not been compromised subsequent to on-boarding with BGIS. These annual screenings are a ‘Level 1’ review and include assessment of: Sanctions / Watch lists and Politically Exposed Persons relating to the entity name. Escalated reviews are performed on an ad-hoc basis where further information is required by BGIS. These reviews include expanded screening of Open Source Litigation and Credit reporting material.
Supplier Prequalification	All suppliers providing on-site services to BGIS and its clients are required to subscribe to the Avetta contractor management platform. This platform prequalifies suppliers against BGIS minimum company requirements and includes specific disclosures regarding compliance with the Modern Slavery Act, including: • All suppliers must acknowledge that they have read, understood and adhere to the BGIS Supplier Code of Conduct which makes specific reference to the application of the Modern Slavery Act; • All suppliers must register and induct their staff via the platform providing BGIS with direct visibility of all staff the supplier intends to utilise in the provision of services to BGIS.

OUR ACTIONS

Modern Slavery questionnaire	Using Avetta, BGIS vendor prequalification includes specific review material to assess risk and vulnerability of modern slavery in the BGIS supply chain and this continues in our current practices. For off-site suppliers, this material was distributed manually for completion and return. Supplier completions were monitored by the BGIS procurement team for 281 vendors deemed to be Tier 2 (medium residual risk) following our supplier risk assessment process [above]. Any exceptions resulted in a supplier escalated to Tier 1 status with auditing activities then conducted. The questionnaire is designed to identify risk, vulnerability and compliance in the BGIS supply chain by assessing: • Annual turnover, company location • Company statement requirements on Modern Slavery • Controls to prevent bonded labour • Supply chain transparency • Country of origin • Audit programs • Policy statements • Training programs • Risk Assessments • Controls reviews
Supplier Auditing	BGIS Procurement undertook formal auditing of suppliers with a residual high risk 'Tier 1' rating as follows: Service Suppliers: The majority of BGIS supplier relationships are within the facilities management services industry. Auditing in this field maintained a focus on labour practices, including: • Demonstration to BGIS that all staff employed in the provision of services are directly employed by the service provider and hold appropriate visa / permit rights where applicable. The evidence is to include, rostering, timetables and payroll material; • Demonstration to BGIS that all staff employed have been paid their correct entitlements, including, but not limited to: ▪ The payment of award wages, including demonstration of correct overtime and penalty rate payments; ▪ That all leave entitlements and contributions have been met by the service provider, including evidence of annual and sick leave, evidence of long service leave contributions made by the service provider, and demonstration that all superannuation entitlements have been met. Goods Suppliers: Tier 1 suppliers providing goods or materials to BGIS are primarily associated with industrial and construction supplies. Auditing in this field focuses on supply chain transparency, including: • Demonstration to BGIS that the provision of goods and/or materials have been ethically sourced, including an understanding of: ▪ Country of origin; ▪ Labour practices associated with the provision of the good or material; ▪ Transparency of supply chain depth / tiering. Eg. Source of raw material and components; and ▪ Audit and assessment activities conducted by the supplier on its 3rd party supply partners. A total of 24 high risk audits were completed with Tier 1 vendors active within 2024, with no materially adverse findings. TIER 1 HIGH RESIDUAL RISK Services: Auditing All vendors: Labour focus Goods: Supply chain review TIER 2 MEDIUM RESIDUAL RISK Services: Avetta Modern Slavery Review All vendors: Disclosures/statements Escalate exceptions to Tier 1 TIER 3 LOW RESIDUAL RISK Services: Avetta Prequalification All vendors: CreditSafe/ABC Due Diligence Escalate exceptions to Tier 2



EFFECTIVENESS OF ACTIONS

The implementation of our Modern Slavery framework is supported by a strong governance structure that compels BGIS to continuously evaluate risks and enhance transparency across our supply chain.

These efforts underpin a comprehensive program of supplier engagement designed to build the capability of our supply partners. The objective is to ensure they not only understand modern slavery risks but also actively take measures to mitigate vulnerabilities—not only within their direct services to BGIS but also throughout their own supply chains.

Enhancing the capability of our suppliers is a central focus of BGIS's Sustainable Procurement strategy. While self-assessments can yield varying results, ongoing engagement through clarification and feedback plays a critical role in raising awareness of modern slavery risks and reinforces BGIS's commitment to delivering the highest standards of quality and transparency to our clients.

Furthermore, our audit program targeting suppliers assessed as having high residual risk, although it has not revealed any significant non-compliance within our supply chain, has identified opportunities for improvement. These relate both to the BGIS framework and to the control systems employed by our supply partners to provide transparency to BGIS. These insights are further detailed in the 'Next Steps' section below.

CONSULTATION

The BGIS Modern Slavery Framework was developed by senior leaders across Procurement, Legal, People & Culture, and Operations. Updates on supplier engagement progress are regularly shared with the Executive Leadership Team, which holds oversight for all BGIS corporate entities.

All wholly owned BGIS subsidiaries—including HFM Asset Management Pty Ltd, Australian Essential Services Maintenance Pty Ltd, BGIS New Zealand Ltd, Service Resources Limited, DHMC Trade Ltd, Dunedin Housing Maintenance Contractors Ltd, JPC Air Conditioning Pty Ltd, and Area 3 Pty Ltd—have actively participated in supplier reviews. The modern slavery audit program and risk categorisation processes have been uniformly applied across each entity's supply chain. This work is supported by ongoing collaboration between BGIS Pty Ltd's procurement teams and subsidiary leadership, including operations and finance representatives.

Additionally, BGIS shares information with both our clients and those of our subsidiaries to explain our approach to identifying and reducing modern slavery risks within our operations and supply chains.

NEXT STEPS

BGIS has made significant progress in identifying modern slavery risks and implementing measures to mitigate these risks within our operational practices through the application of our Modern Slavery framework. Our priorities for 2025 continue to embed these practices by:

- Enhancing the support and guidance provided to suppliers throughout the assessment process
- Regularly updating our training programs to increase awareness and build capability among staff involved in third-party purchasing activities
- Consistently publishing and reporting the results of our supplier audit programs across all operational areas to maintain and raise awareness of modern slavery risks.

BGIS recognises that identifying and mitigating modern slavery risks within our operations and supply chains is an ongoing commitment. We are dedicated to continually refining and improving our approach to ensure the effective and transparent management of modern slavery risks on behalf of both our organisation and our clients.





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