

BADGE

MODERN SLAVERY STATEMENT

1 July 2024 – 30 June 2025

**SAFETY
QUALITY
ALWAYS**

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INTRODUCTION

At BADGE, we are committed to operating with integrity and to the highest ethical standards. We have a proud culture of delivering quality construction and enjoy a rich history of working with our trade partners and our supply chains to make a positive impact on our projects and society in general.

We recognise that modern slavery is a global issue impacting millions of people. We also acknowledge our responsibility as part of a global supply chain to join the broader community to combat modern slavery in supply chains across borders.

Our Values

Living our values is at the core of our business. We align everything we do with our values as they reflect our vision and culture as well as guide our actions by describing what we stand for as an organisation.

Our values form part of who we are and what drives our people.

TEAMWORK

Working collaboratively to achieve a common objective. Clarifying and understanding each other's roles and responsibilities.

INTEGRITY

Integrity is a concept of consistency of actions, values, methods, measures, principles, expectations and outcomes.

CLIENT FOCUS

Improving the delivery of our services by creating an environment where our people are engaged in adding value to the way we manage our business meet our client's needs.

CONTINUOUS IMPROVEMENT

Recognise who our audiences are, their needs and differences between each client. Listen and respond to individual client requirements.

ACCOUNTABILITY

Take ownership of your own performance, drive accountability of your team.

Our business has been built over 40 years by delivering a high level of product and services, coupled with ethical conduct across clients, suppliers, subcontractors, services providers and staff.

Criteria 1 – Reporting Entity

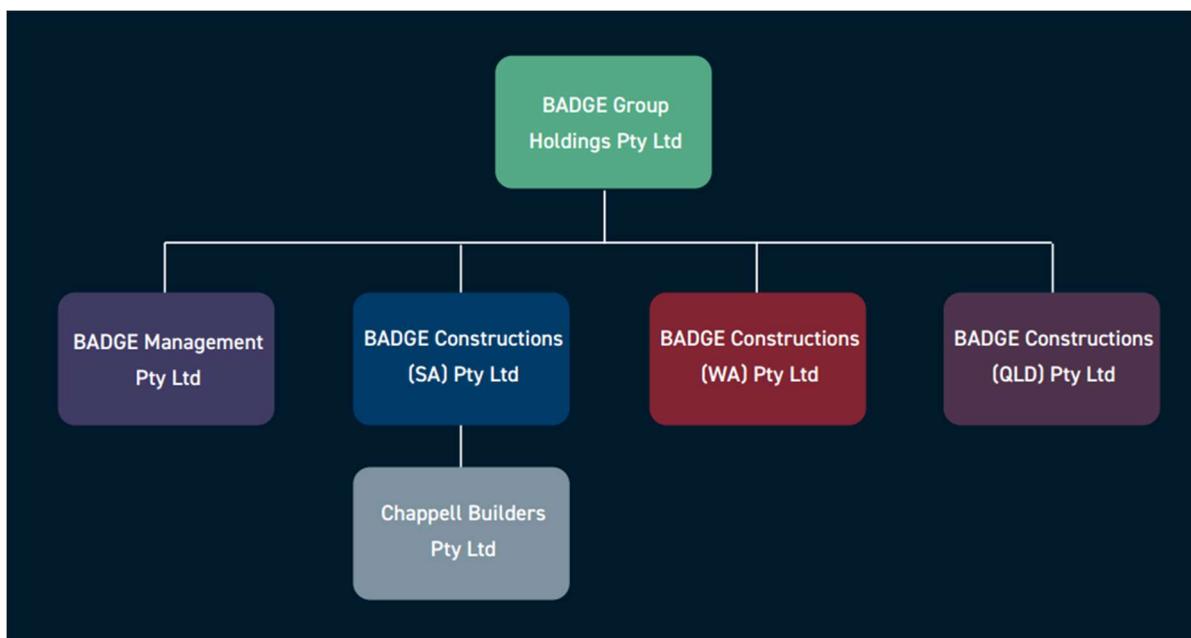
The reporting entity is Badge Group Holdings Pty Ltd ABN 18 606 660 271 (“**BADGE**”) and the included entities are the entities that it owns and / or controls (“**Badge Group**”) for the financial year ending 30 June 2025.

This modern slavery statement is made in accordance with the *Modern Slavery Act 2018* (Cth) (“**Act**”).

Criteria 2 – Our Structure, Operations and Supply Chains

Our Structure

BADGE is the head company of the Badge Group. Within the Badge Group, there are various business entities beneath BADGE that run our operations as shown in the structure diagram below:



BADGE Management Pty Ltd is the entity that holds our employees and is not an operational construction entity. The other entities within the Badge Group are the operational entities which run our state-based construction operations.

Our operations

BADGE is a privately-owned construction company that was established in 1983. We operate across Australia in South Australia, Western Australia, Victoria, New South Wales, Northern Territory and Queensland. The Badge Group is managed from our head office at 9 Anzac Highway, Keswick SA 5035.

We employ more than 300 full time and part time employees across Australia and operate in both metropolitan and regional locations. We have a large direct employee base, fulfilling a wide range of key roles such as operation managers, commercial managers, estimators, design managers, project managers, contract administrators, site managers, supervisors, safety advisors.

We conduct our business across a broad range of industry sectors including.

- Education
- Health
- Aged Care
- Defence
- Retail
- Commercial
- Industrial
- Recreational

Our supply chains

During FY25, we engaged with approximately 2,000 Tier 1 suppliers who are primarily based in Australia¹.

Whilst BADGE has a large employee base which can fulfill many roles within our broader operations and projects, at the delivery phase of projects, BADGE engages specialist subcontractors and suppliers with a focus on local supply, limiting our direct overseas procurement.

Our supply chains can be divided into two supply chain groups – those that are core to the construction arm of the business and those that are supplementary to our broader operations.

Core Business – construction specific supplies and services including, but not limited to:

- Raw material suppliers
- Plant and equipment suppliers for hire or purchase
- Design and consultancy
- Supply and installation subcontractors (outlined further below)
- Construction support services i.e., traffic management.

Supplementary – corporate and sundry suppliers and services including, but not limited to:

- Corporate uniforms and branded merchandise
- Communications and information technology
- Legal and accounting

¹ “Tier 1 suppliers” are the suppliers that BADGE directly engages with (i.e., suppliers that BADGE has direct, contractual relationships with).

- Cleaning
- Motor vehicle purchasing and leasing
- Temporary accommodation
- Hospitality and catering
- Office consumables.

As outlined above; to deliver on our projects, we engage various subcontractors to provide works such as:

- Civil works – Local Supply & Installation
- Piling Works – Local Manufacture & Installation
- Concrete Place & Finish – Local installation
- Structural Steel – Local Manufacture & Installation
- Roofing – Local Manufacture & Installation
- Facade Cladding – Local Supply & Installation
- Façade Glazing – Local Supply & Installation
- Internal linings – Local Supply & Installation
- Joinery – Local Manufacture & Installation
- Services Works – Local Installation, local procurement agent

Criteria 3 – Risks of modern slavery in operations and supply chains

Operational risks

BADGE has a suite of policies and procedures in place to promote compliance and ethical conduct across our operations, including:

- Equal Employment and Opportunity Policy
- Anti-Discrimination, Bullying and Harassment Policy
- Whistleblower Policy
- Safety Policy
- Workplace Grievance Resolution Policy
- Employee Assistance Program
- Modern Slavery Policy

As outlined above, we have grievance mechanisms in place which allows employees, suppliers and other “eligible disclosers” to report grievances through various avenues. This extends to any modern slavery, human rights and employment concerns.

BADGE pays its employees in accordance with Australian laws and requirements. Through our tender process, we ensure that our subcontractors agree to comply with their legislative requirements, contractually enforcing the requirement to comply with obligations under the *Fair Work Act 2009* (Cth) and the *Work Health and Safety Act 2012* (Cth).

BADGE acknowledges that engaging labour hire inherently comes with heightened modern slavery risks. As part of our standard operations, we have a number of systems in place that allow us to have visibility over the work completed and the working hours of employees and subcontractors. For example, we have mechanisms to ensure that accurate time information is kept for all site workers, which assists us in monitoring the employment and health and safety conditions on site.

During this reporting period, we have developed additional employee training surrounding modern slavery which will be rolled out during the FY26 reporting period. This training will help address operational risks by educating employees on:

- what modern slavery is;
- what BADGE'S reporting obligations are under the Act;
- the due diligence procedures that BADGE undertakes; and
- how to report concerns of modern slavery to BADGE.

Based on the above, we consider our operational risks of modern slavery to be low.

Supply chain risks

BADGE acknowledges that like all entities, BADGE is not immune to the risks of modern slavery, particularly deeper in our supply chains beyond our Tier 1 suppliers.

As a construction company, BADGE engages a wide variety of suppliers who operate across different industries. These supply chains are often complex and opaque, with suppliers ranging across multiple jurisdictions and "tiers" within the supply chains.

BADGE utilises the UN Guiding Principles "cause, contribute to, and directly linked to" framework to assess its supply chain modern slavery risks.

Linkage to modern slavery	Description	Example
<i>Cause</i>	Modern slavery that the entity causes its via its acts and / or omissions.	An entity that withholds identity documentation from migrant workers as a condition of employment.
<i>Contribute to</i>	Activities and / or omissions by an entity which facilitate or enable modern slavery.	Engaging a supplier that is unusually lower cost than the industry average.
<i>Directly linked to</i>	Linked to modern slavery and harm through products, services or business relationships.	Engaging a supplier that is later discovered to be engaging in child labour.

We have utilised the "cause, contribute to and directly linked to" framework and have assessed our key supply chains in the table below:

Supply chain	Risk for BADGE	Description of risk
Raw materials	Directly linked to	<p>Certain raw materials carry heightened modern slavery risks, such as bricks, lime, cement materials, glass and steel, particularly when these raw materials are sourced from high-risk jurisdictions.</p> <p>BADGE sources the majority of its equipment and raw materials from local Australian suppliers. However, BADGE acknowledges that there are inherent risks in these supply chains where there is a lack of visibility over the suppliers deeper in the supply chain.</p>
Solar panels	Directly linked to	<p>Solar panels are a high risk good for modern slavery, in particular the raw material component of solar panels known as polysilicon. The majority of the world's polysilicon is sourced from the Xinjiang Uyghur Autonomous Region ("Xinjiang") in China which is known to use forced labour and forced labour camps.</p>
Corporate uniforms and branded merchandise	Directly linked to	<p>Garments and uniforms, particularly those made with cotton and linen, have heightened modern slavery risks due to the risks associated with cotton supply chains. Cotton is a high-risk raw material for modern slavery due to the complexities of these supply chains and when linked to high-risk jurisdictions such as the Xinjiang region in China.</p>
Personal Protective Equipment (PPE)	Directly linked to	<p>PPE has been a high-risk sector, particularly since the supply chain impacts and sourcing issues from the COVID-19 pandemic which increased the risk of forced labour.</p> <p>A key example of this risk is the extensive media coverage around the production of single use gloves in Malaysia and its prevalent forced labour practices.</p>
Cleaning	Directly linked to	<p>The cleaning industry carries heightened risks because of the prevalence of the following risk factors:</p> <ul style="list-style-type: none"> • the volume of migrant workers in the industry;

		<ul style="list-style-type: none"> • subcontracting, creating additional issues with transparency and opaqueness; and • deceptive recruiting practices (for example, debt bondage) being commonly used in the industry.
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Criteria 4 – Actions taken to assess and address modern slavery risks

During the FY25 reporting period, BADGE built on the initial work undertaken during the FY24 reporting period which was primarily aimed at undertaking an initial assessment of our key ESG and compliance gaps and the actions that BADGE should undertake to take genuine action in this space.

This gap analysis process helped us establish an action plan for the FY25 reporting period. Accordingly, below are the key action items that BADGE has undertaken during the FY25 reporting period, many of which will continue to be progressed and implemented in the FY26 reporting period to further assess and address our modern slavery risks:

- Developed a Supplier Code of Conduct (“**Code**”) which will be rolled out during the FY26 reporting period to govern and outline our expectations for our suppliers. The Code applies to all our suppliers, their employees, and contractors across all locations. It complements existing legal and contractual obligations imposed on our suppliers and assists BADGE with complying with its obligations under the Act by clearly articulating BADGE’s due diligence and conduct expectations for suppliers. Overall, BADGE’s expectation is that our suppliers will engage openly with BADGE, report any concerns and cooperate on corrective actions when needed. They must follow all relevant laws, including those related to governance, safety, labour and the environment.
- Development of modern slavery employee training which will be rolled out during the FY26 reporting period. The contents of this modern slavery employee training is described further in Criteria 3 above.
- Prepared and implemented a due diligence framework which allows us to build supplier due diligence into our procurement and tendering processes as “business as usual”. This includes the development of a self-assessment questionnaire (“**SAQ**”) that we will begin to be rolled out to suppliers via our procurement system during the FY26 reporting period. This SAQ has been drafted deliberately to focus on assessing the modern slavery risks associated with high-risk raw materials that BADGE procures (as further described in Criteria 3) and the due diligence procedures (if any) undertaken by our suppliers.

- Reviewed our existing Contract Clauses and Tender Documentation to ensure we are addressing our Modern Slavery obligations and our minimum standards for suppliers within a contractual setting. We have updated our Contract Clauses, Tender Documentation and Procedural documentation to reflect the above changes. This assists BADGE by providing contractual backing to any requests that we make of our suppliers through our due diligence efforts.
- Continued to engage third party guidance to assist with undertaking the above action items and progressing our ESG compliance more broadly.

Criteria 5 – Assessing the effectiveness of our actions

As outlined above, the ESG gap analysis process undertaken during the FY24 reporting period informed the development of an action plan outlining the key actions to undertake during the FY25 reporting period, which resulted in the action items described in Criteria 4 being undertaken. This kickstarted an annual process of reviewing the actions undertaken, identifying key gaps and implementing an action plan for the following year to address these gaps. The aim of this review process is to ensure that BADGE is:

- focusing efforts on the due diligence processes which assist BADGE in assessing and address operational and supply chain modern slavery risks; and
- continuously improving its modern slavery compliance efforts year on year (as required by the Act).

Accordingly, BADGE has undertaken a review of the actions undertaken during the FY25 reporting period and has provided a status update of those action items below. In this review, we have outlined how these action items will be further progressed during the FY26 reporting period.

Action Item	Description	FY25 Status	Next Steps FY26
Supplier Code of Conduct (" Code ")	Developed a Code outlining expectations for suppliers, contractors and their employees.	Developed and implemented	Roll out to suppliers via our procurement system, review to ensure engagement and compliance
Due Diligence Framework	Prepared a due diligence framework to integrate supplier due diligence into procurement and tendering processes	Framework prepared.	Implementation of due diligence framework via supplier onboarding and procurement activities; monitor effectiveness and refine

Supplier Self-Assessment Questionnaire ("SAQ")	Develop a SAQ to issue to all suppliers to assess modern slavery risks	SAQ prepared	Rollout to all new suppliers; review of responses to identify and mitigate any identified risks
Contract Clauses and Tender Documentation review	Review of contracts, tender documents, and procedures to ensure Modern Slavery obligations and supplier standards are embedded contractually	Reviews undertaken, updates to contracts being rolled out	Continued roll out of contract updates
Employee Training	Modern Slavery awareness and compliance training for staff	Explored different delivery options and creating the content	Decided on an in-house online training platform; rolling out training to all staff; monitor completion
Third- Party Guidance Engagement	Engaged external expertise to support implementation of action items and broader ESG compliance	Continued engagement of third-party advisors	Continue working with third-party advisors to refine processes and strengthen ESG and Modern Slavery compliance

Given many of our modern slavery compliance actions are still in their infancy stages of implementation, it is too early to assess their full effectiveness. BADGE will continue reviewing the progress and outcomes of these actions, particularly as many of them are rolled out during the FY26 reporting period, to evaluate their impact on assessing and addressing BADGE's operational and supply chain modern slavery risks.

BADGE intends to continue to develop an action plan for each reporting period, building on lessons learned from the prior reporting years. This approach will ensure that each reporting period's action plan is informed by a review of the previous year's progress, supporting the continuous improvement of BADGE's modern slavery and broader ESG compliance efforts going forward.

Alongside this, BADGE engages third party advisors which assist us in reviewing our progress year on year and provide guidance on the development of the action plan against the requirements of the Act and any potential legislative amendments to the Act. Given we are expecting amendments to the Act in the near future, BADGE will be monitoring any legislative changes alongside its third-party advisors to ensure that its modern slavery compliance framework complies with any new requirements introduced.

Criteria 6 – Consultation

This modern slavery statement has been prepared by BADGE. The included entities within this modern slavery statement are the entities within the BADGE Group."

In terms of consultation during this reporting period, there is a common leadership team and Board governing the Badge Group. Furthermore, the policy and procedure framework outlined in Criteria 3 applies uniformly across the Badge Group. Accordingly, there has been consultation in the preparation of this modern slavery statement and through the application of the Badge Group's broader modern slavery compliance framework.

Through the implementation of the action items outlined in Criteria 4, representatives from the Badge Group were engaged in the development and implementation of these initiatives, which apply across the Badge Group. This engagement with representatives across the Badge Group will continue as these initiatives are more formally rolled out across the Badge Group during the FY26 reporting period.

Going forward, when reviewing the efforts undertaken during the reporting period, representatives from the Badge Group will be engaged in this process to ensure that there is a robust consultation across the Badge Group.

Criteria 7 – Any other information

In the coming reporting period, BADGE will focus on the implementation and further embedding of our newly developed due diligence processes and training across the organisation, as further outlined in Criteria 5.

This includes monitoring our updated procedures to ensure compliance, reviewing SAQ responses conducted under BADGE's new due diligence framework and evaluating training uptake and feedback from staff. BADGE will also continue working with third-party advisors to refine our processes and strengthen ESG and Modern Slavery compliance, including monitoring movements with proposed changes to the Act.

Tracking progress against the implementation of our core action items and insights from external advisors will help us identify gaps, enhance our approach, and ensure that our modern slavery compliance framework becomes fully integrated into BADGE's day-to-day operations.

APPROVAL

This modern slavery statement is BADGE's third modern slavery statement and is for the period of 1 July 2024 to 30 June 2025.

This modern slavery statement was reviewed and approved by the BADGE Board.

A handwritten signature in black ink, appearing to read "J. Whiting".

Jim Whiting - Chair

11 December 2025