

Tuesday, 11 February 2025

RE: MODERN SLAVERY STATEMENT FOR EXACT CONTRACTING GROUP PTY LTD FOR FINANCIAL YEAR ENDING 30 JUNE 2024

This Modern Slavery Statement is prepared by Exact Contracting Group Pty Ltd (ABN 65 057 760 353) and its wholly owned subsidiaries Exact Contracting Services Pty Ltd (ABN 13 080 117 291), Exact Contracting Pty Ltd (ABN 24 607 096 515) and Exact Water Pty Ltd (ABN 98 662 619 036) (collectively called '**Exact**' and '**Exact Group**') in compliance with the *Modern Slavery Act 2018* (Cth) for the financial year ending 30 June 2024.

It outlines the commitment and steps taken by Exact to assess and address the risks of modern slavery in our operations and supply chains.

1. REPORTING ENTITY

Exact Group is privately owned and founded in 1992.

Exact delivers projects for both government and private clients, specialising in civil construction, mining, water and agricultural infrastructure, and associated maintenance activities.

With a commitment to quality and safety, Exact has built a strong reputation for delivering projects on time and within budget.

Exact works with a wide range of suppliers and subcontractors to source materials and services necessary for project completion. The company is dedicated to ensuring that, as far as reasonably practicable, modern slavery does not occur within its supply chains or operations, maintaining strict guidelines for procurement and conducting regular audits to assess and address any risks related to modern slavery.

Exact sources goods, materials, and services from a range of suppliers, including manufacturers, wholesalers, and subcontractors. We engage both domestic and international suppliers, primarily for construction materials and services and heavy machinery parts and repair services.

While its direct operations focus on providing construction services, Exact acknowledge the inherent risks of modern slavery within supply chains for materials like steel, cement, and electrical components, as well as in the provision of subcontracted labour. Exact also assess the geographical locations from which it sources materials and services, noting that certain geographical regions have higher risks of modern slavery.

In the 2023/2024 Financial Year, Exact had approximately 953 suppliers with whom it spent \$201m. Of these suppliers, 948 were located within Australia, many of which maintain strong long-term relationships with Exact.

Although Exact has identified potential areas of risk for modern slavery within our operations, it considers this risk is low when managed by Exact's internal processes and systems for identifying and mitigating these risks.

2. ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Exact conducts an ongoing risk-based assessment process to identify modern slavery risks within our operations and supply chains. This includes:

2.1. Supplier Evaluations: Exact evaluates potential suppliers to determine their adherence to ethical standards. These audits include reviewing whether there are any publicly available record of convictions or legal action regarding modern slavery or child labour.

2.2. Contract Clauses: All contracts with subcontractors include specific clauses related to modern slavery. These clauses outline our zero-tolerance policy for slavery and trafficking and stipulate that contracts may be terminated if any breaches are discovered.

2.3. Internal Audits and Reports: Exact conduct internal audits of our anti-slavery practices to assess how well it is managing risks within our operations and supply chains. These audits are conducted its senior management to determine whether adjustments can be made to improve its processes.

2.4. Employee and Stakeholder Feedback: Exact encourage employees, suppliers, subcontractors and other stakeholders to notify senior management should they identify instances of modern slavery or areas of risk. They are also encouraged to provide feedback on the effectiveness of any policies, procedures or actions that are implemented, which helps inform future improvements.

2.5. Remediation Process: If modern slavery is identified within its supply chain or operations, Exact is committed to taking immediate action to address the issue, including:

- Working with the supplier or subcontractor to implement corrective actions.
- Terminating contracts with suppliers or subcontractors found to be in violation of our policies.
- Offering support to victims of modern slavery where possible, including facilitating access to support services.

3. ASSESSING THE EFFECTIVENESS OF ACTIONS

Exact regularly reviews the effectiveness of our actions to identify, investigate and remediate potential modern slavery risks that may arise. Exact is committed to continuously improving our efforts to prevent modern slavery. In addition to the actions described above, we are exploring additional means to enhance transparency in our supply chains.

Moving forward, Exact has identified the following areas for improvement:

3.1. New Supplier Form: Exact will review its PURFRM-001_New Supplier Form to ensure it effectively communicates the obligations under the *Modern Slavery Act 2018* (Cth) to its suppliers and subcontractors. The form should allow Exact to request information on any policies or programs in place to prevent modern slavery. Suppliers and subcontractors may also be asked to disclose their subcontractors and to confirm that they adhere to similar ethical standards.

3.2. Training and Awareness Programs: Exact may implement training programs for key staff, including procurement teams, project managers and senior management to raise awareness of modern slavery risks and how to detect and respond to potential issues.

4. CONSULTATION

Exact has consulted with its Executive Team (General Manager – Corporate and Business, General Manager – Operations, Chief Financial and Commercial Officer), Senior Management (National Safety, Training and Quality Manager, Human Resources Manager) and its General Counsel in the preparation of this statement.

Key management within these relevant departments inform discussions pertaining to modern slavery to ensure that all facets of the business are integrated into our efforts to combat modern slavery.

5. NEXT STEPS

Exact will continue to assess our operations, supply chains and business practices to ensure that it uphold its obligations under the *Modern Slavery Act 2018* (Cth). This statement represents Exact's ongoing commitment to preventing modern slavery and reflects our dedication to ethical business practices.

This statement was approved by and signed on behalf of Exact Contracting Group Pty Ltd on the 11th of February 2025.



Dominic Burman

Chief Financial and Commercial Officer