



L.U. SIMON BUILDERS MODERN SLAVERY STATEMENT

FY25



L.U. Simon Builders acknowledges the Traditional Custodians of the land on which we live, work, and build. We pay our deepest respects to Elders past and present, and we honour the enduring connection Aboriginal and Torres Strait Islander peoples have to Country, community, and culture.



About this Statement

This is the first Modern Slavery Statement (Statement) prepared by L.U. Simon Builders Pty Ltd (ABN 38 006 137 220) (L.U. Simon Builders) in accordance with the Modern Slavery Act 2018 (Cth) (the Act) and covers the financial year ending 30 June 2025. This Statement is prepared for L.U. Simon Builders Pty Ltd and the associated entities L.U. Simon Builders (Management) Pty Ltd, Construction Labour Hire Pty Ltd and Lebuild Abbotsford Stage 2 Pty Ltd.

Herein references to “L.U. Simon Builders”, “Group”, “us”, “we”, or “our” in this Statement are references to L.U. Simon Builders and each of the reporting entities unless specified otherwise.

The Statement describes the steps taken during the reporting period to identify, assess, and address modern slavery risks in our operations and supply chains, as well as our plans for future action.

We recognise that modern slavery is a serious global issue that can affect vulnerable people in complex and hidden ways. Although this is the beginning of our journey, L.U. Simon is committed to building a structured and transparent approach to modern slavery risk management.

This Modern Slavery Statement was approved by the Board of Directors of L.U. Simon Builders Pty Ltd, in its capacity as the principal governing body of the company and applies to all entities owned or controlled by L.U. Simon Builders.

Consultation with Controlled Entities

L.U. Simon Builders Pty Ltd prepared this Statement in consultation with the entities it owns and controls, including L.U. Simon Builders (Management) Pty Ltd, Construction Labour Hire Pty Ltd and Lebuild Abbotsford Stage 2 Pty Ltd. Consultation was led by the ESG Manager and involved engagement with the Board of Directors and senior management.

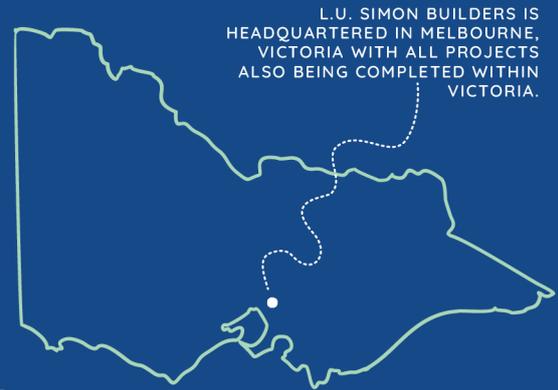
As this is our first year reporting under the Modern Slavery Act, our consultation processes are still developing. During FY25, consultation primarily involved information sharing, review of draft content, and confirmation of operational practices with Directors and managers responsible for procurement, construction delivery, and corporate governance.

We expect that consultation will expand in future reporting periods as our modern slavery program matures. Planned improvements include the establishment of a Modern Slavery Working Group, structured data collection processes across entities, and more formalised engagement to support a consistent and Group-wide approach to identifying and managing modern slavery risks.

REPORTING CRITERIA

MANDATORY CRITERIA	PAGE
a) Identify the reporting entity	2, 4
b) Describe the reporting entity's structure, operations and supply chains.	4 - 7
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	8 - 10
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	10 - 11
e) Describe how the reporting entity assesses the effectiveness of these actions	12
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	3
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	13

OUR BUSINESS, STRUCTURE AND OPERATIONS



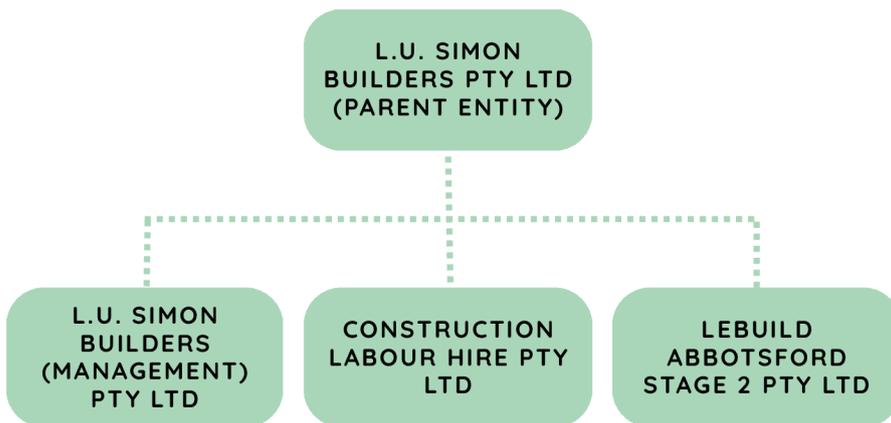
Company Overview

Founded in 1955, L.U. Simon Builders is a privately owned Australian construction company headquartered in Melbourne, Victoria. We are recognised as one of the state’s leading builders, delivering residential, commercial, and mixed-use projects.

Governance and Structure

L.U. Simon Builders comprises the following primary entities, with each entity registered in Australia:

- L.U. Simon Builders Pty Ltd (Parent Entity)
- L.U. Simon Builders (Management) Pty Ltd
- Construction Labour Hire Pty Ltd
- Lebuild Abbotsford Stage 2 Pty Ltd



The construction business is delivered through L.U. Simon Builders Pty Ltd and L.U. Simon Builders (Management) Pty Limited and is led by our Managing Director, Peter Devitt, supported by the Directors.

L.U. Simon Builders (Management) Pty Ltd provides corporate support; however, most day-to-day operations are carried out by L.U. Simon Builders Pty Ltd. Importantly, the majority of L.U. Simon Builders supply chains is managed by these two entities.

1955

YEAR ESTABLISHED

\$231M

FY25 ANNUAL REVENUE

8

SITES UNDER CONSTRUCTION

\$12B

TOTAL CONSTRUCTION VALUE

168

TOTAL HEAD COUNT

41%

% OF WORKERS UNDER AND ENTERPRISE BARGAINING AGREEMENT

Construction Labour Hire Pty Ltd is a dormant entity that does not conduct trading activities or employ workers. It does not have an operational supply chain exposure relevant to this Statement.

Lebuild Abbotsford Stage 2 Pty Ltd is a special purpose entity established to deliver the Abbotsford Stage 2 development project.

In June 2025, L.U. Simon appointed its first ESG Manager to lead the company's modern slavery, sustainability, and compliance programs. This marks the formal beginning of a structured approach to managing environmental, social, and governance (ESG) risks.

Operations

LU Simon Builder's is an Australian construction company specialising in the delivery of residential and commercial building projects. Our core operations include project management, design coordination, procurement, construction delivery, and on-site supervision across all stages of a project's lifecycle.

We manage a directly employed workforce and engage a wide network of subcontractors, consultants, and specialist trades to support the safe and efficient delivery of our projects. Our operations also include the management of site establishment, structural works, building services installation, finishing trades, and handover processes, as well as the internal corporate functions that support these activities, such as finance, safety and ESG.

L.U. Simon Builders does not own or control any subsidiaries or offshore operations; however, we acknowledge that modern slavery risks can exist deep within building-product supply chains and in subcontracted labour arrangements. As a result, we are committed to strengthening visibility across our operations, maintaining responsible procurement practices, and continually improving how we assess, manage, and mitigate modern slavery risks within the delivery of our projects.



OUR SUPPLY CHAIN

Our operations rely on a diverse and decentralised construction supply chain that spans subcontracted labour, locally and internationally sourced building materials, and a wide range of professional services. We work closely with suppliers of concrete, steel, façade systems, services equipment, internal finishes, and other key components, acknowledging that while many of our tier-one suppliers are based in Australia, some materials are manufactured or processed overseas.

In FY25, our procured goods and services spend totalled approximately \$231.4 million, engaging 815 subcontractors and suppliers across Australia. Many of these suppliers work with their own sub-suppliers, creating a broad and complex extended supply chain that involves thousands of products and services contributing to our projects.

To provide further clarity, the following sections outline the key components of our supply chain and the different types of relationships involved:

Labour

Project delivery relies on a wide range of skills, including professional consultants, engineers, trades, unskilled labourers, and specialist subcontractors. This decentralised workforce creates multi-layered relationships that require careful management to ensure that all participants understand their responsibilities and obligations. Ensuring fair wages, safe working conditions, and compliance with labour laws is a key priority across all tiers of

our workforce. L.U. Simon remains vigilant in reinforcing these protections, providing guidance and monitoring to maintain consistent standards and uphold worker rights throughout the supply chain.

Materials

We source substantial volumes of construction materials including concrete, steel, joinery, façades, and specialist equipment. While most first-tier suppliers are based in Australia, some components, particularly façade and joinery items can be procured from overseas manufacturers or processors.

The multi-stage nature of these material supply chains can make full visibility challenging. L.U. Simon works closely with subcontractors and suppliers to improve transparency, assess potential risks, and promote responsible sourcing across all material categories, helping ensure the integrity of our projects from procurement through delivery.

Services

Operational and corporate support is provided through a range of goods and services, including IT, professional services, travel, cleaning, security, and insurance. These suppliers help maintain operational efficiency, business continuity, and high-quality project delivery.

These relationships are actively managed and reviewed to ensure they remain reliable, cost-effective, and aligned with L.U. Simon's broader governance and ESG objectives. **PAGE 6**

Geographic Sourcing

Most of our Tier 1 suppliers are Australian-registered entities however we have identified that 1% of our total spend comprises products and materials sourced from China directly.

This spend was predominately for windows and façade procurement. However, like the wider construction industry, we are indirectly exposed to higher-risk regions through imported:

- steel, aluminium and façade systems (China, Southeast Asia),
- tiles and stone (China, India, Turkey, Italy),
- textiles/uniforms (South Asia),
- solar panels and electronic equipment (China).

We also acknowledge that complex global supply chains mean that even purchases made through Australian-based suppliers may involve upstream sourcing from higher-risk regions. Improving visibility of these upstream tiers remains a key focus as we continue to strengthen our due diligence across the supply chain.



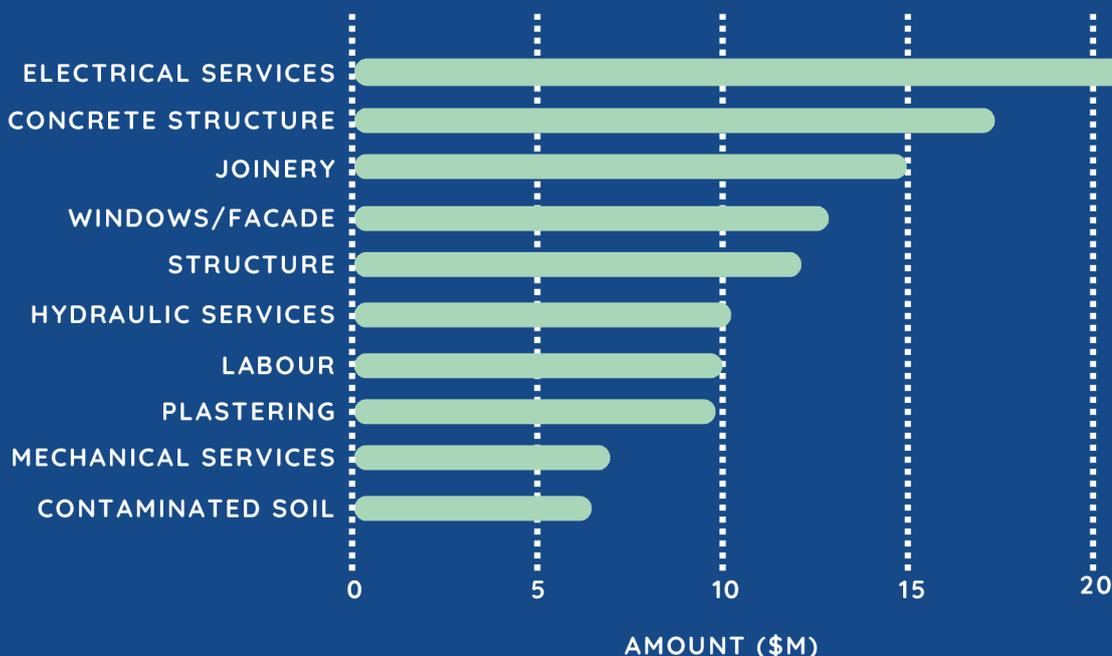
815

DIRECT (TIER 1) SUPPLIERS

1%

**% OF TOTAL SPEND COMPRISING
OF PRODUCTS AND MATERIALS
SOURCED FROM CHINA DIRECTLY**

**TOTAL SPEND BREAKDOWN FOR FY25 PER
CATEGORY (TOP 10 CATEGORIES OF SPEND):**



MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

Understanding Our Risk Profile

Our assessment of modern slavery risks considers both the broader context of the Australian construction industry and the specific characteristics of our own operations and supply chain. The sector is inherently complex, with multi-tier subcontracting, diverse labour arrangements, and global product sourcing. These factors can limit transparency and create vulnerability points for exploitation, particularly where low-skilled or migrant labour is involved, or where materials originate from regions with weaker labour protections.

Within this landscape, we will continue to refine our understanding of where modern slavery risks may occur, drawing on industry research, supplier engagement, and insights from our priority risk areas. This structured approach helps us identify the areas where enhanced due diligence is required and where targeted action can have the greatest impact.

Risks in Our Direct Operations

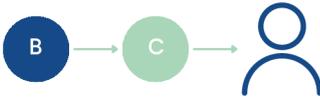
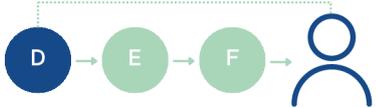
Our employees are based in Australia and engaged under employment arrangements that comply with the Fair Work Act 2009, including access to protections relating to wages, conditions, and freedom of association.

While we consider our direct operations to be low risk, we acknowledge that certain workforce cohorts in the broader construction sector, such as temporary visa holders or non-permanent workers, may be more vulnerable in some contexts. We monitor these issues through our internal and site management processes and will continue to review our internal controls as our operations evolve. We have not identified any instances of modern slavery in our direct workforce.



Risks in Our Supply Chain

L.U. Simon Builders applies the United Nations Guiding Principles on Business and Human Rights (UNGP) Cause, Contribute and Directly Linked Continuum of Involvement, to inform our understanding of our role and connection to adverse human rights impacts because of our business activities, and the appropriate responses.

INVOLVEMENT	CAUSE	CONTRIBUTE	DIRECTLY LINKED
			
Hypothetical example	A construction company (A) exploits lower skilled workers it engages directly	A construction company (B) knowingly engages a subcontractor (C) which has previously been found to exploit its workers and does not undertake any modern slavery due diligence checks for this supplier	A construction company (D) engages a subcontractor for a project (E), who orders materials made by a third supplier (F) using exploited labour.
Expected Action	<ul style="list-style-type: none"> • Stop or prevent the action • Provide for or cooperate in remediation 	<ul style="list-style-type: none"> • Stop or prevent contribution • Use leverage to mitigate any remaining impact • Provide for or cooperate in remediation 	<ul style="list-style-type: none"> • Build or use leverage to prevent and mitigate the impact • Be able to show ongoing efforts to mitigate the impact • Potentially take a role in remediation • Decide whether to stay in the business relationship

As with most Australian construction companies, potential modern slavery risks are more likely to arise within supply chains rather than direct employment. These risks relate to structural characteristics of the industry and the globalised nature of material sourcing, not to any specific findings within our supplier base.

Labour-related risks may arise in subcontracted activities where workforces are transient, lower-paid, or reliant on migrant labour, such as finishing trades, cleaning, labour hire, and traffic management. These factors can create conditions in which exploitation may occur in the sector more broadly and therefore warrant continued monitoring and engagement with our subcontractors.

Material-related risks may exist in upstream manufacturing processes for products commonly used in construction and sourced globally. This includes categories identified at an industry level as potentially higher risk, such as certain steel products, stone, textiles, PPE, solar panels, and façade or mechanical components. Multi-tier international supply chains can limit visibility beyond Tier 1 suppliers, and the country of origin for some products may carry elevated risk profiles under global indices.

We note that these risks are potential and industry-based and are not reflective of any identified incidents within our own supply chain. As we mature in our modern slavery approach our due-diligence processes will strengthen so that we can better identify, assess and manage these types of potential risks over time, with a focus on improving transparency and supplier engagement across the lifecycle of our projects.

ACTIONS TAKEN IN FY25

Although this is our first year reporting under the Modern Slavery Act, we have focused on building the foundational governance, processes and systems necessary for a responsible and effective modern slavery program. Our actions to date have emphasised establishing oversight, strengthening internal capability, and improving our understanding of potential risks across our operations and supply chain.

Governance and Policy Development

- Strengthened internal leadership: In June 2025, we appointed an ESG Manager with accountability for the development and implementation of L.U. Simon's modern slavery framework, broader ESG initiatives, and compliance processes. This role provides dedicated oversight and ensures the organisation's program aligns with emerging legal and industry expectations.
- Commenced development of key policies: Work began on drafting a Modern Slavery Policy, Supplier Code of Conduct, and Whistleblower Policy. These documents are designed to articulate our expectations of employees, subcontractors, and suppliers, and to reinforce our commitment to ethical and responsible business practices across all projects.
- Planning for a cross-functional governance structure: We initiated the design of a Modern Slavery Working Group to support program governance, coordinate actions across procurement, accounts, and site operations, and to monitor performance against our actions. This group is planned for full implementation in FY26.



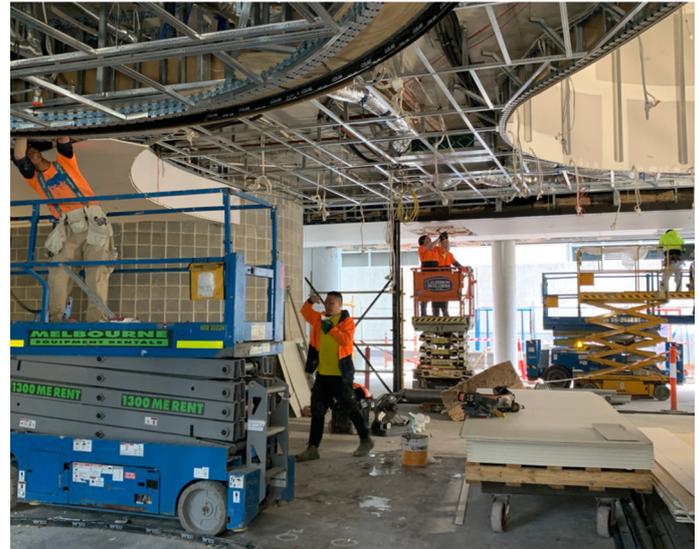
Initial Risk Review and Benchmarking

- Industry-informed risk scanning: We undertook a desktop review of goods and services commonly identified as higher-risk in the construction sector, including imported steel and metal products, façade systems, stone and tile products, uniforms and PPE, and subcontracted labour-intensive services such as cleaning and traffic management.
- Peer and industry benchmarking: We compared our current practices against peer organisations and broader industry standards to identify gaps, priority risk areas, and opportunities for improvement. This helped inform the design of our future supplier engagement and due-diligence approach.

Procurement and Contract Strengthening

- Review of contractual protections: We commenced a review of our standard subcontract agreements and supplier terms with the objective of incorporating modern slavery clauses and strengthening expectations relating to ethical sourcing, transparency, and cooperation with due-diligence processes.
- Enhancement of procurement processes: Work began on assessing our procurement and onboarding processes to identify opportunities to embed modern slavery considerations. This includes exploring integration of prequalification questions, supplier risk screening mechanisms, and documentation requirements for new suppliers.

These foundational activities provide the basis for a structured and scalable modern slavery program that will continue to develop in future reporting periods.



Remediation Process

L.U. Simon recognises its responsibility to respond appropriately if modern slavery-related concerns are raised and substantiated through our grievance or due diligence processes. While we have not identified any such instances to date, we acknowledge the importance of having clear, structured pathways in place should we ever cause or contribute to harm. Our approach is guided by the principles of transparency, proportionality, and respect for affected individuals.

As part of our FY26 program, we will strengthen our organisational capability to support remediation by enhancing grievance mechanisms and formalising escalation pathways. This includes establishing a Whistleblower Policy and associated reporting channels to enable employees, subcontractors, and individuals within our supply chain to raise concerns confidentially and without fear of retaliation. We also intend to develop a remediation framework that outlines appropriate steps for addressing confirmed incidents, including how potential victims may be supported and how impacts can be addressed in a manner consistent with regulatory expectations and human rights best practice.

ASSESSING EFFECTIVENESS

As this is our first reporting year under the Modern Slavery Act, our focus has been on establishing foundational governance structures and due-diligence processes. While formal Key Performance Indicators (KPIs) have not yet been implemented, we recognise that assessing effectiveness is essential to strengthening our approach over time.

From FY26, we intend to introduce a suite of performance measures to evaluate whether our actions are improving transparency, enhancing supplier engagement, and reducing potential modern slavery risks within our operations and supply chain. These indicators will be reviewed periodically to reflect changes in our business, emerging regulatory expectations, and industry better practice.

These measures will support us in determining whether our actions are influencing behaviour, improving oversight, and strengthening the overall resilience of our supply chain. As our program matures, we will review annually and refine these key performance indicators and introduce additional measures to ensure our approach remains robust and proportionate to the risks within our operating environment.

Planned measures to assess effectiveness include:

01

Supplier due-diligence completion rates: monitoring the percentage of Tier 1 suppliers who complete our modern slavery questionnaire to improve visibility of potential risks

02

Supplier engagement outcomes: reviewing follow-up actions required from suppliers following questionnaire responses or risk screening, such as requests for clarification, corrective actions, or policy updates.

03

Training participation: tracking the proportion of employees who complete modern slavery awareness training, with a focus on procurement, site management, and contract administration teams.

04

Contractual compliance: monitoring the extent to which new contracts and renewals incorporate modern slavery clauses and expectations regarding ethical sourcing.

05

Grievance and incident monitoring: recording the number of modern slavery-related grievances or concerns raised (if any) and documenting how they are assessed, escalated, and addressed.

FUTURE ACTIONS

Building on the foundational work completed in FY25, our FY26 priorities focus on embedding modern slavery risk management across all relevant aspects of the business:

- Finalise and publish key policies: Complete the Modern Slavery Policy and Supplier Code of Conduct to provide clear guidance for employees, subcontractors, and suppliers.
- Implement supplier due-diligence processes: Roll out questionnaires to Tier 1 suppliers to assess potential risks, improve transparency, and inform ongoing engagement.
- Deliver employee awareness and training: Launch targeted training for all staff, with emphasis on procurement, contract management, and site operations.
- Establish a Modern Slavery Working Group: Form a cross-functional governance group to coordinate program activities, monitor progress, and review risk assessments.
- Develop a remediation framework: Establish structured processes for responding to any modern slavery concerns or incidents that may arise.
- Monitor and report on effectiveness: Begin tracking KPIs and other measures to assess program impact, support continuous improvement, and demonstrate accountability.

These steps will support the ongoing development of a robust, risk-based modern slavery program, ensuring that L.U. Simon maintains transparency, compliance, and ethical standards across its operations and supply chain.

APPROVAL OF STATEMENT

This Modern Slavery Statement was approved by the Board of Directors of L.U. Simon Builders Pty Ltd, in its capacity as the principal governing body of the company, on 5th December 2025.

As authorised by the Board, the statement is signed below by Kane Devitt, acting on its behalf.



Kane Devitt
Director
For and on behalf of the Board of Directors
L.U. Simon Builders Pty Ltd

