

MODERN SLAVERY STATEMENT 2025

Figurehead Construction Pty Ltd

Reporting Period: 1 July 2024 – 30 June 2025

1. Introduction

Figurehead Construction is committed to operating responsibly and ethically across all areas of our business. We recognise the importance of identifying and addressing risks of modern slavery and human trafficking in our operations and supply chain. This statement outlines the actions we are taking to assess, prevent, and mitigate the risk of modern slavery in line with the requirements of the **Modern Slavery Act 2018 (Cth)**.

2. Our Structure and Operations

Figurehead Construction is a privately owned Australian construction company, delivering high-quality projects across commercial, mixed-use, education, and multi-residential sectors. Since our establishment in 2007, we've completed over 80 projects, operating with a team of 70+ staff and a network of subcontractors, suppliers, consultants, and specialist partners.

We are headquartered in Melbourne, Victoria, and operate solely within Australia.

3. Our Supply Chain

Our supply chain includes a wide range of goods and services such as:

- Subcontracted trades (e.g., concrete, electrical, carpentry)
- Material suppliers (e.g., steel, timber, fixtures, and fittings)
- Design consultants and engineering services
- Plant and equipment hire
- Labour hire providers
- Corporate goods and services (e.g., IT, office supplies)

We recognise that risks of modern slavery are more likely to exist in lower tiers of the supply chain, particularly in the sourcing of raw materials and products from overseas.

FIGUREHEAD

4. Identifying Risks of Modern Slavery

We have undertaken a risk assessment of our operations and supply chain, identifying key risk areas including:

- **Imported materials** such as steel, timber, and stone that may be sourced from countries with weak labour protections
- **Labour hire** arrangements where there may be limited transparency over recruitment practices
- **Subcontractors** who may use third-party labour, especially in high-risk sectors such as cleaning, formwork, and tiling

5. Actions to Assess and Address Modern Slavery Risks

To address the risk of modern slavery, we have implemented or are in the process of implementing the following measures:

- **Supplier and Subcontractor Prequalification:** All subcontractors and suppliers are assessed against modern slavery criteria through our onboarding process in ProcurePro.
- **Contract Clauses:** Subcontract agreements include clauses requiring compliance with modern slavery laws and ethical employment practices.
- **Training and Awareness:** Training is being rolled out for staff on identifying signs of modern slavery and understanding reporting mechanisms.
- **Due Diligence:** We undertake due diligence on higher-risk suppliers and seek transparency about their own supply chains.
- **Procurement Practices:** Preference is given to suppliers with ethical sourcing policies and proven track records of fair labour practices.

6. Measuring Effectiveness

We are committed to continually improving our approach. We will monitor the effectiveness of our actions by:

- Reviewing and updating our risk assessment annually
- Tracking the number of subcontractors completing prequalification checks
- Monitoring for reports or grievances related to modern slavery
- Engaging with industry groups and platforms to stay informed of emerging risks and best practices

FIGUREHEAD

7. Consultation and Collaboration

We consult internally across our construction, commercial, and HSEQ teams to ensure alignment in our risk management approach. We are also exploring opportunities to collaborate with industry bodies, suppliers, and other stakeholders to strengthen our efforts to eliminate modern slavery.

8. Approval

This statement has been approved by the Directors of Figurehead Construction in accordance with the Modern Slavery Act 2018 (Cth).

Signed,

Signed by:

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Joe Grasso

Director

Figurehead Construction Pty Ltd

Date: 28th January 2026