



MAINBRACE
CONSTRUCTIONS

FY24

MODERN SLAVERY STATEMENT

ACKNOWLEDGEMENT OF COUNTRY

We acknowledge the Traditional Owners of the land where we work and live. We pay our respects to Elders past, present and emerging.

We celebrate the stories, culture and traditions of Aboriginal and Torres Strait Islander Elders of all communities who also work and live on this land.

INTRODUCTION

A fundamental strategy of our business is the creation of shared value and in doing so we acknowledge the potential for any of the eight types of serious exploitation defined in the Act to occur in our operations and extended supply chains. We understand and accept our continuing obligation to assess and address these risks.

The statement is issued in compliance with the Modern Slavery Act 2018 (Cth) (the Act) requirement to report on the risks of modern slavery in our operations and supply chains for the reporting period of 1 July 2023 – 30 June 2024.



REPORTING ENTITY

The reporting entity is Mainbrace Constructions Pty Limited (ABN 45 002 970 658) and its wholly owned subsidiary Mainbrace Constructions (QLD) Pty Limited (ABN 47 131 334 159).

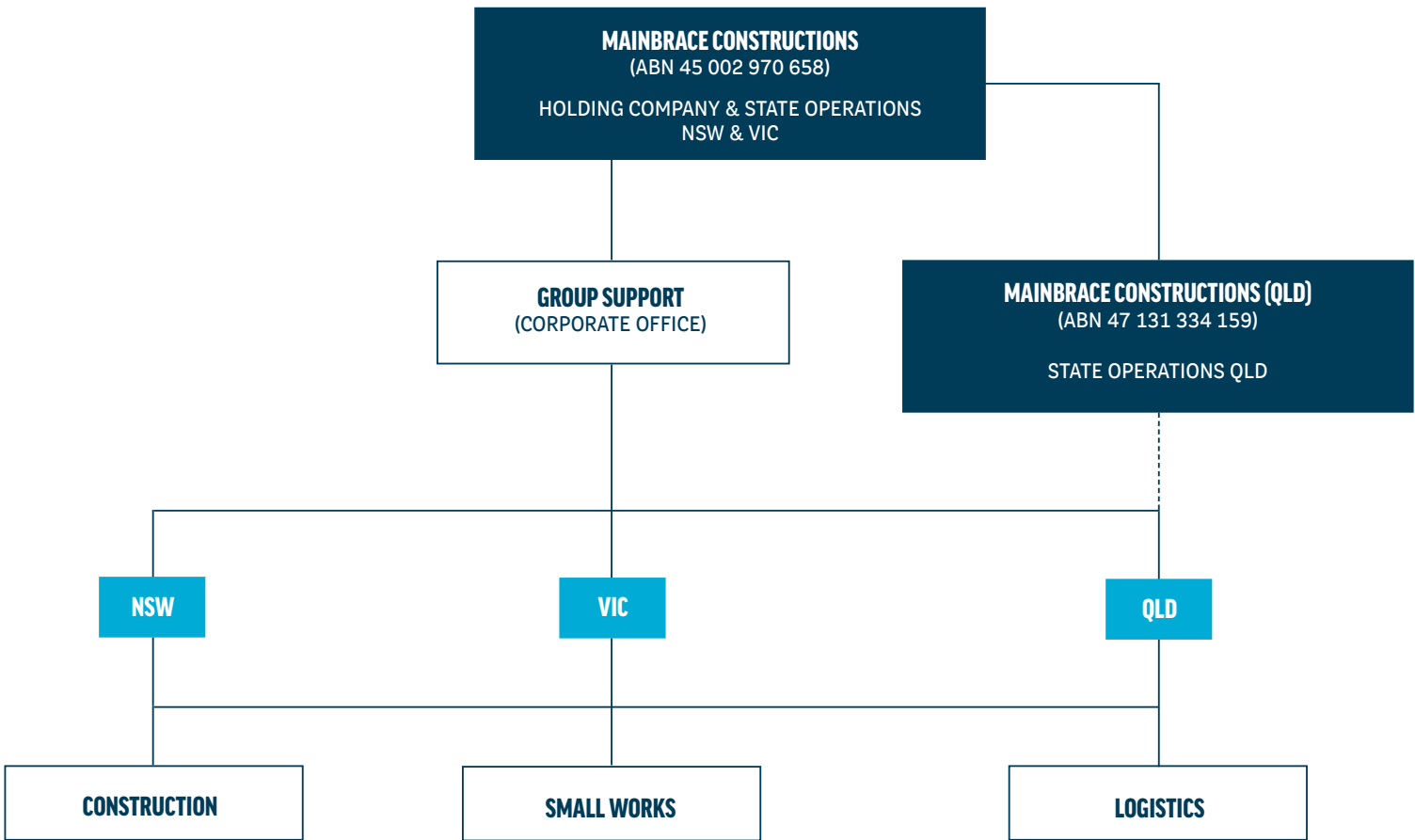
Mainbrace Constructions Pty Limited and Mainbrace Constructions (QLD) Pty Limited both operate in the retail sector of the construction industry. Both companies have shared ownership and directorship, a shared corporate office (Group Support), shared systems, policies and processes and many shared suppliers.

Accordingly, all reports of actions to assess and address modern slavery have been consolidated for both entities in this statement.

STRUCTURE, OPERATIONS & SUPPLY CHAIN

Mainbrace is a retail construction specialist having successfully completed more than 1,800 projects over the past 35 years with a consolidated revenue of \$471M in FY24.

Mainbrace’s organisational structure is as outlined below:



OUR DIVISIONS



CONSTRUCTION

Retail construction is the core of our business. The division encompasses a wide range of projects from large format retail to supermarket rollouts, to refurbishment of existing retail centres, to retail logistics and new greenfield retail centres.



SMALL WORKS

Leveraging our proven experience in Supermarket Refurbishments and Interiors, our Small Works division is dedicated to delivering professional, efficient, on-time smaller projects.

We combine competitive pricing with agility and efficiency, offering exceptional service tailored to your needs—whether it's a complex refurbishment, a new build, or a capital works project.



LOGISTICS

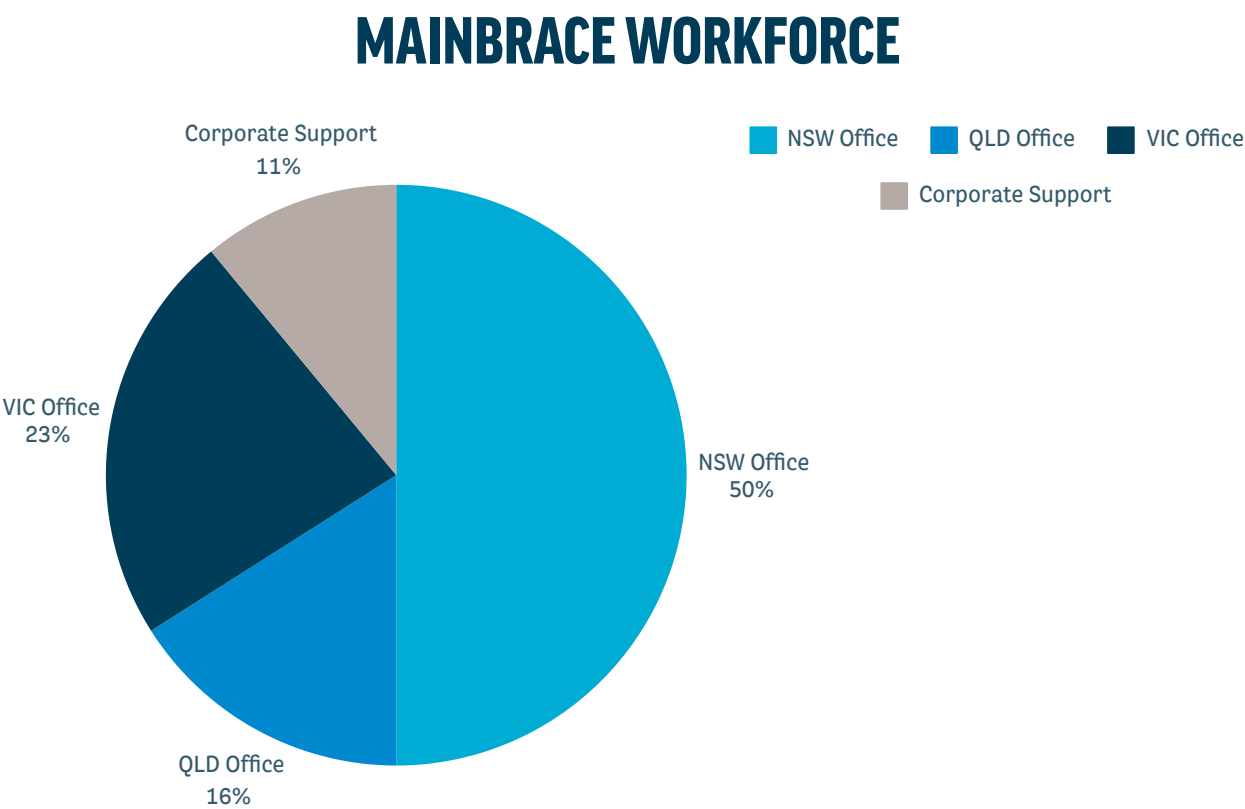
Our clients are facing the challenge of embracing the growing demand for on-line purchasing. We are working with our clients to deliver supply chain efficiencies that get their goods to consumers faster, more conveniently and seamlessly.

From warehousing, last mile, transport hubs, order fulfilment centres to inventory management facilities - we build them all, no matter how small.

OUR PEOPLE

Mainbrace employs approximately 255 people, over 99% of which reside in Australia and 86% of which are permanent salaried employees with the remainder employed under Industry awards and agreements.

The distribution of the workforce across the business is as follows:

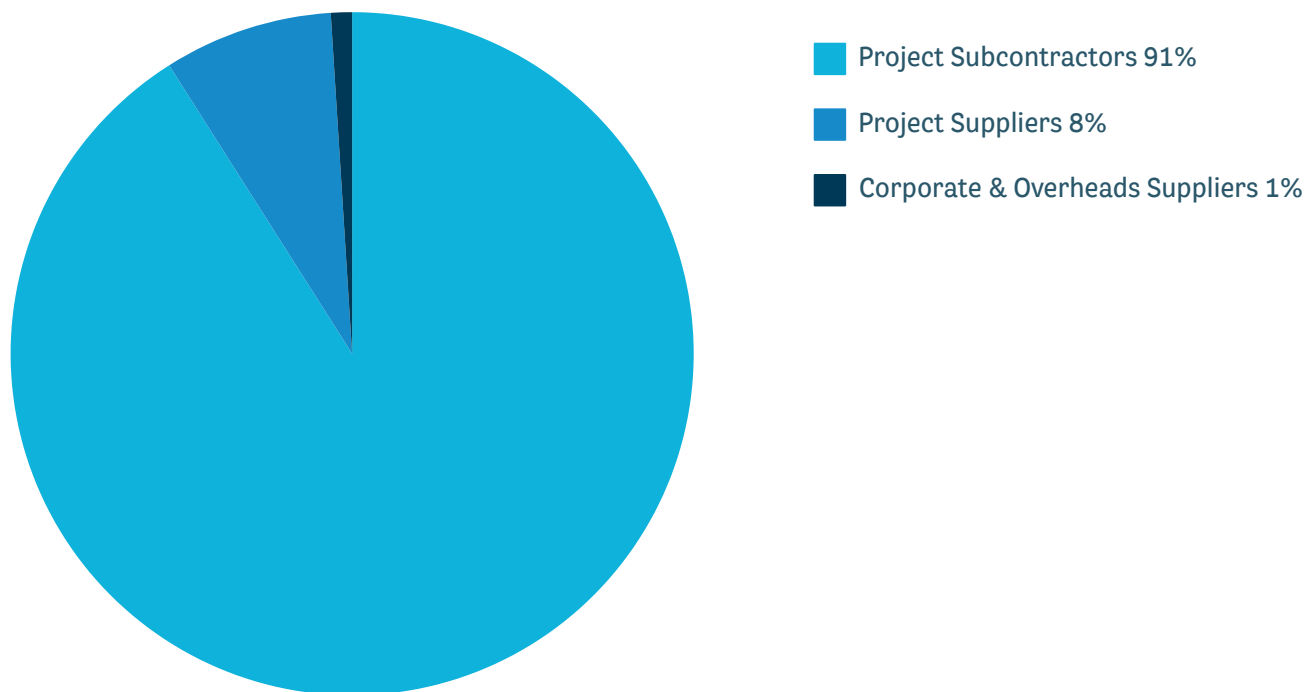


SUPPLY CHAIN PROCUREMENT

Mainbrace as a head contractor manage the construction process and is largely dependent on our suppliers and subcontractors to procure the goods and services used directly and indirectly in our business.

In FY24 our supply chain consisted of 2,105 Australian based entities distributed across the business as follows:

FY24 MAINBRACE SUPPLY CHAIN OVERVIEW



The median spend with a supplier in our supply chain amounted to \$18,534.00 + GST and the average spend of \$196,582.00 + GST.

Group corporate procurement consisting of our offices, consumables, equipment, and technology totalled 1% of our supply chain spend with our projects under construction amounting to 99% of our spend.

All subcontractors and suppliers where goods and services were procured by Mainbrace in FY24 were Australia based. Nonetheless we recognise that our supply chain extends overseas and with that the higher propensity for modern slavery practices to exist.

To maintain the integrity of our operations, Mainbrace employ a documented procurement procedure incorporating supplier performance management processes. This multi-level approval process ensures what is supplied meets the expectation of our business and is fit for their intended purpose.

RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS & SUPPLY CHAINS

Due to the nature upon which our direct employees are engaged there is no risk of modern slavery in this element of our operations.

Determining the risk and extent of modern slavery practices in our greater supply chain is challenging due to the lack of transparency in any extended supply chain and the underground nature of modern slavery practices. The challenge is further compounded by the complexity of the extended supply chains and data limitations.

The Global Slavery Index 2023 provides that the top five imported products into Australia at risk of modern slavery are electronics, garments, solar panels, textiles and fish. Of the five, electronics, garments and solar panels feature in our supply chain. However, we additionally acknowledge that there will be numerous other products ultimately procured from overseas markets which could have been produced by labour working in unregulated labour conditions.

The extended labour resources used in our operations and the physical construction process on our projects present a very low risk for the existence of modern slavery practices. Notwithstanding this fact there are certain trades in the construction industry such as cleaning, security and general labour hire in which low skilled, unskilled and temporary workers are employed that potentially present a higher risk of engaging in modern slavery practices.





ACTIONS TAKEN TO ASSESS AND ADDRESS THE RISK OF MODERN SLAVERY PRACTICES

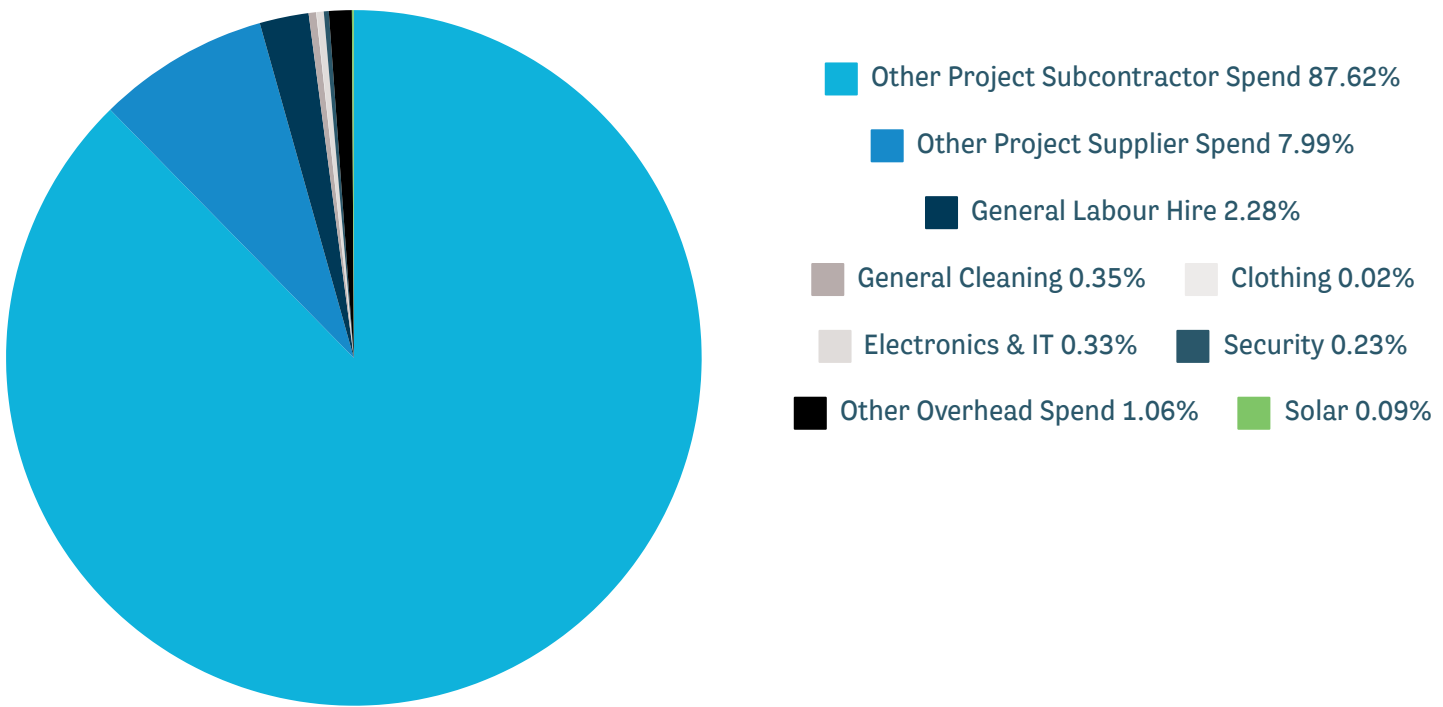
Due Diligence

In our previous statements we outlined our commitment to focus our resources where we could influence change with our larger immediate suppliers and also target those areas of our supply chain considered to potentially pose a higher risk for the existence of modern slavery practices.

To ensure our strategy remains current it was necessary to again in FY24 consider our supply chain and our spend data.

The resultant cost data provided the following:

FY24 SUPPLY CHAIN DUE DILIGENCE



While we acknowledge that modern slavery has the propensity to exist anywhere in our supply chain, from this macro perspective there was a lesser risk of modern slavery practices being employed in 96.67% of our FY24 supplier spend with only 3.33% of our spend representing potentially high-risk suppliers.

In comparison to FY23 our spend on potentially high-risk suppliers increased from 2.26% to 3.33% largely due to the supplementation of our attendant labour resources with short term resources when required.

The actions taken in FY24 to address supply chain risk are described in the next section.

ACTIONS TAKEN

Supply Chain Risk Assessment

In order to assess the potential risk of modern slavery practices existing in our immediate supply chain and our higher risk suppliers we continue to use our modern slavery questionnaire to educate our supply chain on modern slavery and to assess their policies and procedures in relation to modern slavery.

In comparison to our findings in FY23 we have found:

Key Findings

- The participation rate in the completion of our questionnaire has increased with the introduction of an internal process audit;
- Our immediate supply chain's obligation to report under the Act continues to be low;
- The vast majority of new suppliers who participated in our questionnaires are still not aware of the Act;
- Visibility, verification and monitoring of modern slavery risk in our supply chain continues to be generally low.

Recommendations

- Continue to use our procurement process to educate our direct supply chain on the intent of the Act.
- Continue with the use of internal process audits to ensure all new suppliers complete our modern slavery questionnaire prior to works being awarded.

Modern Slavery Awareness Training

General awareness training continues to be undertaken with specific training on our procurement policies and procedures to address modern slavery provided to new and existing members in our procurement teams.

Procurement Policies and Procedures

We continued to employ our standard methodology in the procurement of goods and services on our projects in FY24 to educate our primary supply chain on the risks of modern slavery and to contractually obligate them to assess and address modern slavery risk.

Remediation Process

To date we have not yet identified, nor have we yet been made aware that our business practices have caused or contributed to modern slavery. Should an instance become known we will cooperate in the investigation of the circumstances and partake in the remediation of the impact in accordance with The UN Guiding Principles.





ASSESSMENT OF THE EFFECTIVENESS OF OUR ACTIONS TAKEN

As a business operating solely in Australia and as such in an environment in which there is a low risk of modern slavery practices existing, we have determined that our actions to date have been effective in promoting modern slavery awareness within our business, amongst our primary suppliers and amongst our higher risk suppliers.

From the course of our actions to date we maintain that we must continue with the promotion of modern slavery general awareness and education in order for our supply chain to effectively assess and address the risk of modern slavery in their own businesses and subsequently in the extended supply chain.



PROCESS OF CONSULTATION

To ensure our business operations align with our modern slavery obligations consultation continues with senior management involved in the operations of the business.

From an industry consultation perspective, we collaborated with a number of our major long-term retail clients, their other primary construction contractors, and our industry peers in order to consider how we may jointly mitigate the risk of modern slavery in our construction operations where supplier resources are often shared.

Furthermore, in conjunction with one of our repeat clients we completed investigations into the business practices of select subcontractors who are repeatedly subcontracted by Mainbrace on our client's projects. The selection was based upon trades from an industry perspective have a greater propensity for the presence of modern slavery practices. In all instances no evidence was found.



OTHER RELEVANT INFORMATION

CONTINUOUS IMPROVEMENT

Our modern slavery strategy is built on progressive leadership within our business to increase awareness of the issue which together with a framework of continuous improvement in our policies and processes and the on-going education and training of our employees will together serve to exclude modern slavery practices from our operations and supply chains.

Over the FY25 financial year our key actions will be to:

- Continue to increase our supply chains awareness of the risk of modern slavery practices by educating our primary supply chain on what is modern slavery and by providing them with access to modern slavery resources
- Continue to promote the completion of our modern slavery questionnaire across our primary supply chain so that they can assess their policies and procedures in relation to modern slavery risk;
- Continued education of our team about modern slavery, the risks and their obligations should they encounter possible cases;
- Continued use of process audits to ensure we have adequate governance over our commitment to address the risk of modern slavery in our operations;
- Continued learning, consultation and collaboration with our Industry peers and other stakeholders in addressing modern slavery.

APPROVAL

The Board of Mainbrace has approved this single statement on behalf of Mainbrace Constructions Pty Limited and our included entity, Mainbrace Constructions (QLD) Pty Limited on 4 December 2024.



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