

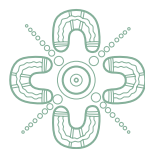


ABERGELDIE
COMPLEX INFRASTRUCTURE

Modern Slavery Statement

ISSUED 2025





ACKNOWLEDGMENT OF COUNTRY

Australia

Abergeldie acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea and community. We pay our respects to their Elders past and present.



MIHI WHAKATAU

New Zealand

Ka whakaae me te whakanui mātou i te ahurea whai rawa o Aotearoa, me te whakamana i ngā iwi me ngā hāpori huri noa i te motu.

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This is Abergeldie's annual Modern Slavery Statement, given under the Modern Slavery Act 2018 (Cth) ("Act"), which outlines Abergeldie's approach to identifying, managing, and mitigating the risks of modern slavery within our operations and supply chain.

This Modern Slavery Statement is prepared in consultation with each reporting entity in the Abergeldie Group and is approved by the principal governing body of Abergeldie, the ultimate holding company of the group.

CEO message



At Abergeldie our purpose is to build better communities. We deliver this in a tangible way through building critical infrastructure that improves the sustainability, resilience, and liveability of the communities we serve. Equally important is how we deliver this work - since the company started in 1994, we have been guided by a long-standing commitment to act with integrity, with a policy of giving back to the community. This stems from the mindset and values established by our founders, Mick and Robin Boyle, who strongly believe the cohesiveness of our society relies on people giving their time, experience, and resources to assist others. This commitment extends beyond our projects and into every aspect of our operations and supply chains.

"There is no place for modern slavery practices in our business, in the Australian community or in global supply chains that support our industry."

We recognise that modern slavery remains a significant global issue, affecting an estimated 50 million people through practices such as human trafficking, slavery, servitude, forced labour, debt bondage, forced or servile marriage, deceptive recruiting for labour services and the worst forms of child labour. There is no place for modern slavery practices in our business, in the Australian community or in global supply chains that support our industry. Abergeldie has zero tolerance for modern slavery, and we are committed to eradicating any activities that exploit others, through identifying, assessing, and addressing risks within our operations and supply chain.

Through this, our sixth Modern Slavery Statement, we outline steps we are taking, through our governance frameworks, risk management processes, and procurement practices, to prevent, mitigate and respond to Modern slavery risks. Taking action to combat modern slavery helps to protect our business against harm and improve the integrity and quality of our supply chain, enabling us to deliver projects, and ensuring we can continue in our mission of building better communities.

Key to ensuring that Abergeldie can assess and address modern slavery risks in our supply chain is our structured due diligence program for suppliers and service providers designed to identify and assess a range of potential risks in the supply chain, including human rights. Where possible, we prefer to work constructively with suppliers to resolve potential issues instead of ending the relationship. Our corporate values and culture of doing what is right underpin our policies and procedures which help to minimise the risk associated with modern slavery into our operations. We aim not only to meet our obligations, but to lead by example and encourage other companies and organisations to follow suit - thereby supporting our aim to build better communities.

This statement was approved by the Board of Abergeldie on 30 May 2026.

Mark Bruzzone,
Chief Executive Officer

What is modern slavery?

Modern slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom. There are an estimated 50 million victims of modern slavery globally. Women and girls are over-represented, comprising more than 50% of victims and nearly more than half of modern slavery victims are in the Asia-Pacific region.¹

Modern slavery is defined by the Act to include eight types of serious exploitation, which can be understood as:

- Human trafficking
- Slavery
- Forced marriage
- Debt bondage
- Servitude
- Worst forms of child labour
- Forced labour
- Deceptive recruiting for labour or services

¹ 'The Global Slavery Index', 2023 by Walk Free.



50 MILLION

victims of slavery globally
(10 million ^ since 2018)



OVER 50%

is estimated to be women and girls



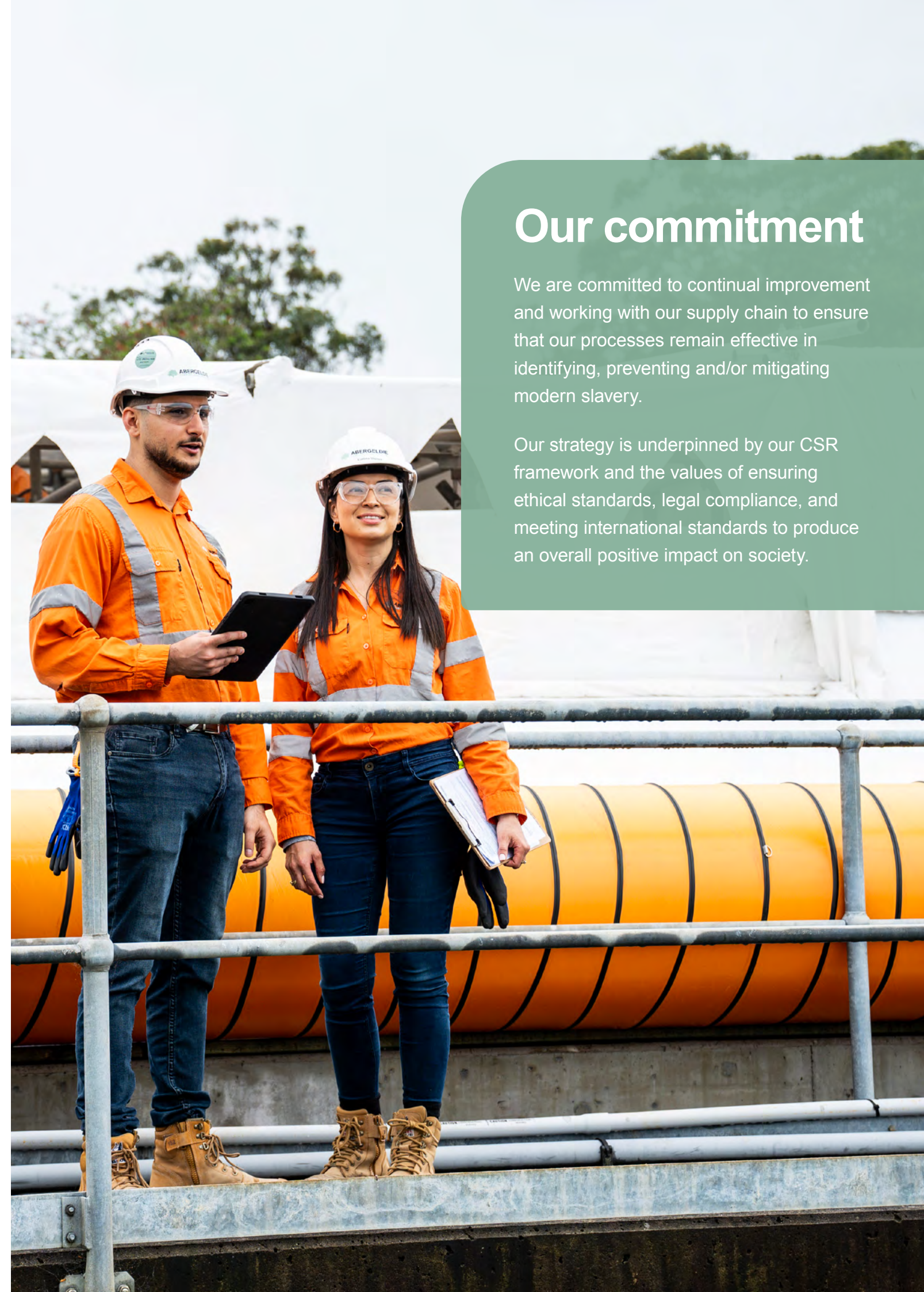
29 MILLION+

are in the Asia-Pacific Region
= 59% of the global estimate

Our commitment

We are committed to continual improvement and working with our supply chain to ensure that our processes remain effective in identifying, preventing and/or mitigating modern slavery.

Our strategy is underpinned by our CSR framework and the values of ensuring ethical standards, legal compliance, and meeting international standards to produce an overall positive impact on society.



About us

We are a leading infrastructure contractor with over 30 years' experience delivering complex projects in Australia and New Zealand.

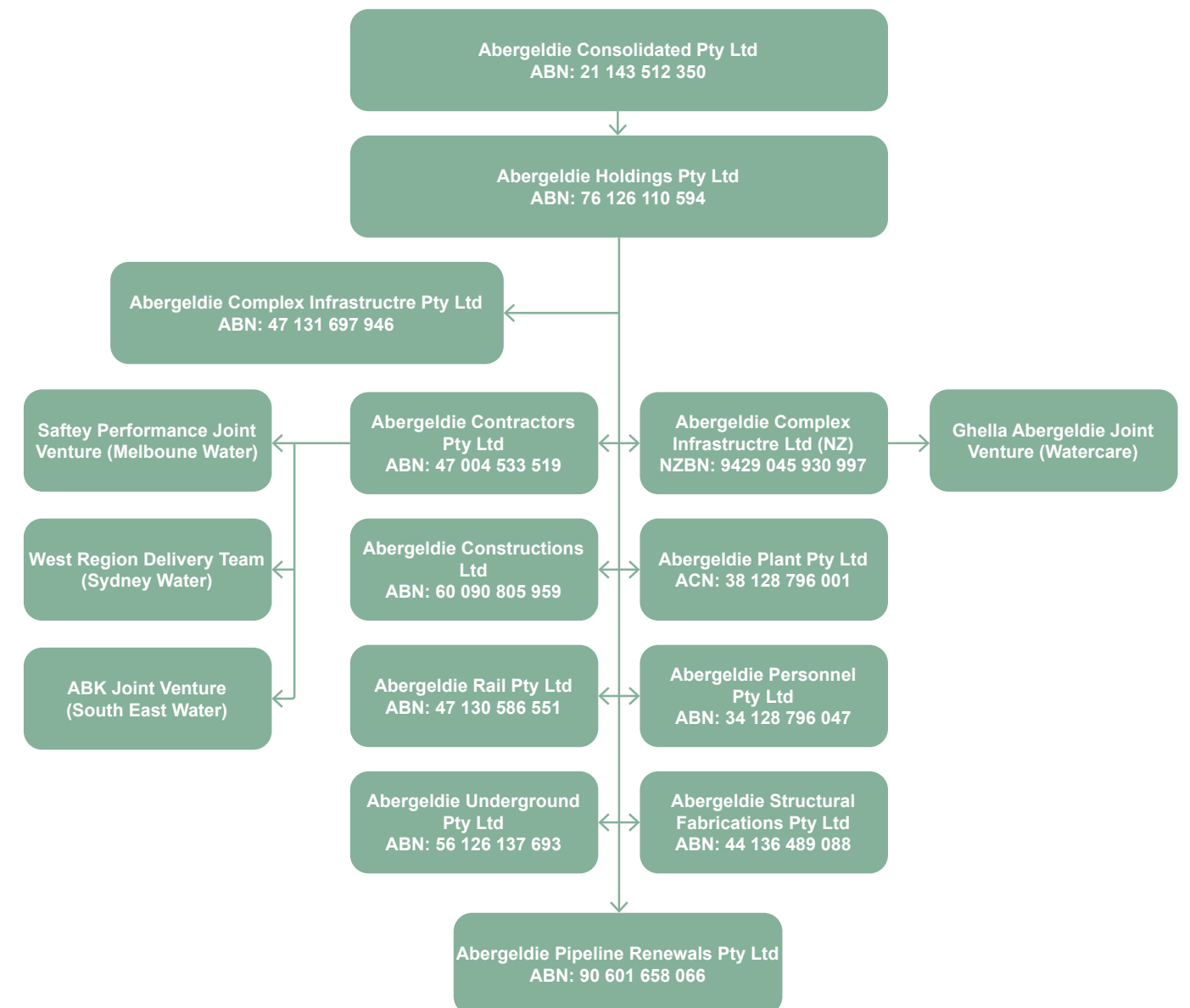
Specialising in water resources, water utilities, bridges and roads, rail, community, and energy infrastructure, we are dedicated to delivering the infrastructure needed to help build better communities.

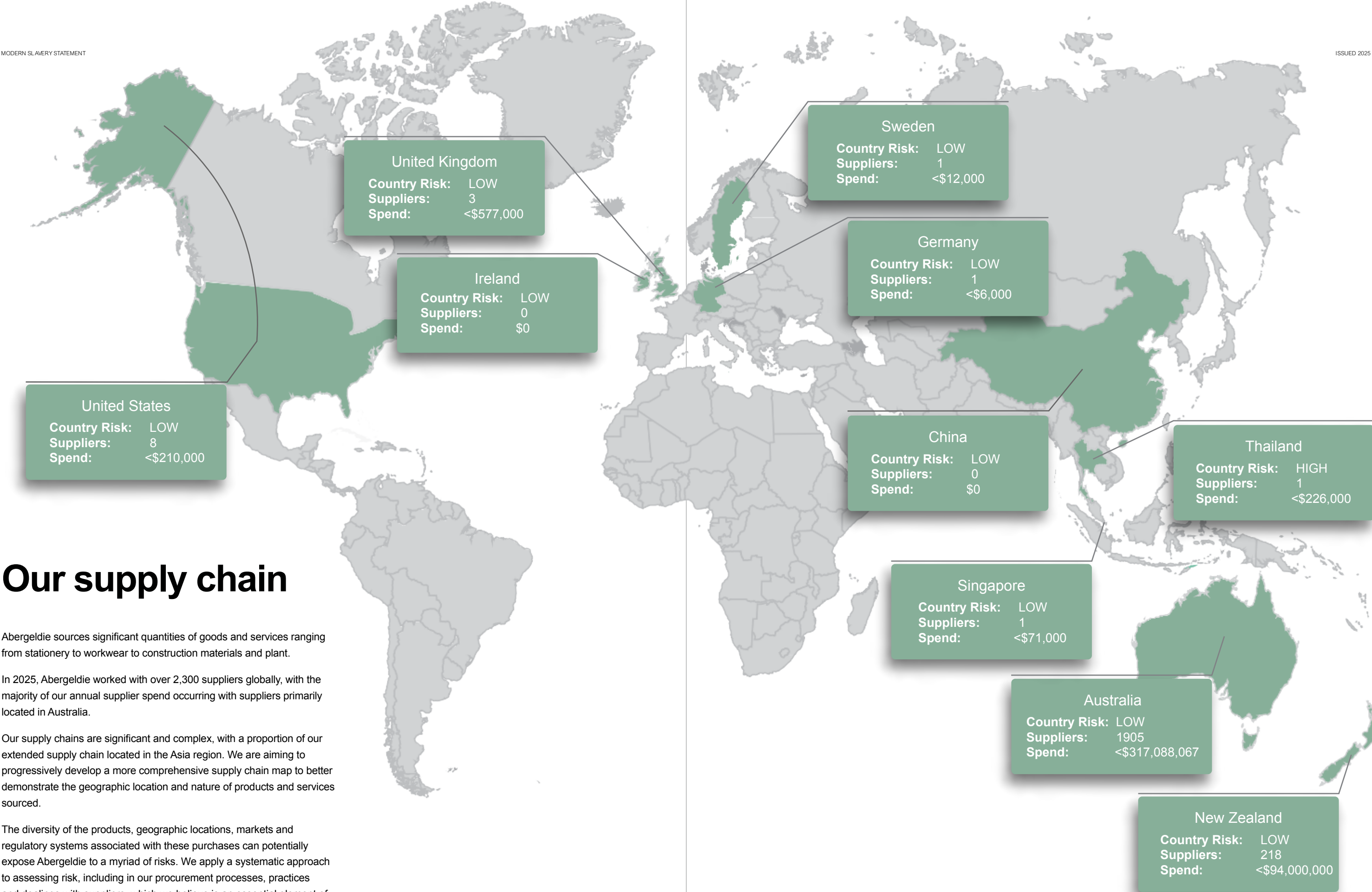
Our expertise spans the entire project lifecycle, from design and construction to maintenance, renewals, and demolition. We excel in delivering the complex infrastructure communities rely on; dams and weirs, water and wastewater treatment plants, bridges, roads, tunnelling and underground, rail and mining infrastructure, electrical and energy storage systems, marine works, and pipeline renewals.

Our purpose to build better communities goes beyond delivering projects that tangibly improve and connect communities, it is also deeply embedded into our core values as a civil engineering business. We are committed to continue this mission by caring about sustainability, equal opportunity rights and combating modern slavery practices.

Abergeldie employs approximately 780 people across Australia and New Zealand. We have offices in Sydney, Newcastle, Dubbo, Brisbane, Gold Coast, Canberra, Melbourne and Auckland.

Our structure





Our supply chain

Abergeldie sources significant quantities of goods and services ranging from stationery to workwear to construction materials and plant.

In 2025, Abergeldie worked with over 2,300 suppliers globally, with the majority of our annual supplier spend occurring with suppliers primarily located in Australia.

Our supply chains are significant and complex, with a proportion of our extended supply chain located in the Asia region. We are aiming to progressively develop a more comprehensive supply chain map to better demonstrate the geographic location and nature of products and services sourced.

The diversity of the products, geographic locations, markets and regulatory systems associated with these purchases can potentially expose Abergeldie to a myriad of risks. We apply a systematic approach to assessing risk, including in our procurement processes, practices and dealings with suppliers, which we believe is an essential element of progressing the global eradication of modern slavery.

Abergeldie’s commitment to building better communities goes beyond providing the complex infrastructure needed to build better communities, it is deeply embedded into our culture.



AREA	MAIN OPERATIONS	SUPPLY CHAIN
Abergeldie Complex Infrastructure Pty Ltd Abergeldie Contractors Pty Ltd Abergeldie Constructions Pty Ltd Abergeldie Rail Pty Ltd Abergeldie Underground Pty Ltd	General Civil Construction Construction and maintenance of railway infrastructure Civil construction within railway corridor Construction of tunnels and shafts Operations based primarily out of Sydney	Concrete and steel suppliers Quarries Hardware stores Office supply stores Contractors Specific equipment and/or materials as nominated by clients Plant and equipment hire suppliers Equipment and/or materials as nominated by clients
Abergeldie Pipeline Renewals Pty Ltd	Construction, maintenance and upgrade of water and wastewater infrastructure Pipe relining and Pipe laying Operations based primarily out of Sydney, Brisbane and Melbourne	Pipe liner suppliers Concrete and steel suppliers Quarries Office supply stores Hardware stores Contractors Specific equipment and/or materials as nominated by clients Plant and equipment hire suppliers
Abergeldie Complex Infrastructure Ltd (NZ)	General civil construction Construction of tunnels and shafts Operations based primarily out of Auckland NZ	Concrete and steel suppliers Quarries Hardware stores Office supply stores Contractors Specific equipment and/or materials as nominated by clients Plant and equipment hire suppliers
Abergeldie Structural Fabrications Pty Ltd	Fabrication of structural steel Operations based out of Sydney	Steel Suppliers Bottled gas suppliers Hardware suppliers Office supply stores Contractors
Abergeldie Plant Pty Ltd	Management and hire of plant and equipment Operations based primarily out of Sydney	Automotive requirements such as fuel, spare parts, vehicles, tyres which may be sourced from overseas locations Portable buildings Office supply stores Mobile plant and equipment suppliers
Abergeldie Personnel Pty Ltd	Hire of personnel Management of human resources Operations based primarily out of Sydney	Uniforms and work attire Contractors Office supply stores
Joint Ventures	General Civil Construction Construction and maintenance of railway infrastructure Civil construction within railway corridor Construction of tunnels and shafts Construction, maintenance and upgrade of water and wastewater infrastructure Pipe relining and Pipe Laying	Concrete and steel suppliers Quarries Hardware stores Contractors Specific equipment and/or materials as nominated by clients Office supply stores Plant and equipment hire suppliers

Risks of modern slavery

Globally, around 7% of the workforce is employed by the property and construction sector, and an estimated 18% of modern slavery victims are found in the construction industry, mostly through forced labour. Significantly, at least 22% of forced labour victims are found in the manufacture and production of raw materials including in forestry, mining and quarrying – key suppliers for property and construction.¹

As the primary work of Abergeldie includes engineering and construction, we acknowledge the risks of modern slavery of supply channels and have accordingly undertaken a review of the potential for modern slavery practices across Abergeldie Group's operations and supply chains using our existing risk management processes and further incorporated and re-evaluated during Abergeldie's annual systems' review, or as required, during systems' management and general management meetings.

To improve our understanding of the risks of modern slavery and of exposure to issues such as corruption, we utilise tools such as the Global Slavery Index and Corruption Perception Index.

¹ KPMG & Australian Human Rights Commission 'Property, construction and modern slavery guide', 2020.



7%

of the workforce is employed by the property and construction sector.



18%

of modern slavery victims are found to be in the construction industry.



22%

of forced labour victims are found in the manufacture and production of raw materials.

Location

Building materials are often sourced from high-risk locations, known to be associated with inadequate working conditions.

Local sector

The construction sector is one of several industries that has seen cases of forced labour exploitation in Australia, many of those identified as victims of labour exploitation were migrant workers who enter Australia to fulfil Australia's labour shortages.

There is an elevated risk of modern slavery within its operations and supply chains because of intersecting structural and contextual risk factors such as an increased demand for a low-skill workforce who are vulnerable to exploitative practices, and for raw materials that are often sourced from high-risk locations.

Skilled workers

As construction activity increases, the risk of exploitation among low-skill and other vulnerable workers may be heightened due to supply chain labour pressures. Abergeldie mitigates this risk through investment in structured internship and graduate programs, supporting the development of a sustainable, skilled workforce and reducing reliance on vulnerable labour sources.

Business model

Abergeldie's, and its supply chain's, business model is heavily reliant on outsourcing, which increases the complexity of operations and supply chains and reduces the visibility of labour risks and impacts.

The abundance of frequent short-term engagements, across multiple sites, often with small sized businesses, provides a challenge to facilitating a collaborative approach to risk management. The low margins almost always present in construction also introduce significant pressures on delivery for the supply chain.

Particular high-risk areas identified include any overseas procurement, such as purchase of:

- Specific construction machinery not locally available
- Supply of clothing, PPE and other small mass-produced items
- Specific machinery or materials specified to be provided in construction contracts

In addition to the above, general purchasing from Australian suppliers has been identified as a possible risk area where those suppliers procure some or all their goods internationally and in a competitive environment where there is an influx of people seeking work.

Building better communities

Abergeldie has zero tolerance for any form of slavery or slavery like practice. We are choosing to take a proactive approach by creating and implementing initiatives with the goal of not only ensuring we comply with modern slavery requirements, but also, our subcontractors and suppliers comply.

Our values

Abergeldie's purpose is to build better communities. Our values, which we call The Abergeldie Way set the premise of our culture and the way we operate with integrity, accountability, responsiveness, sustainability, teamwork, safety and mutual respect.

The Abergeldie Way

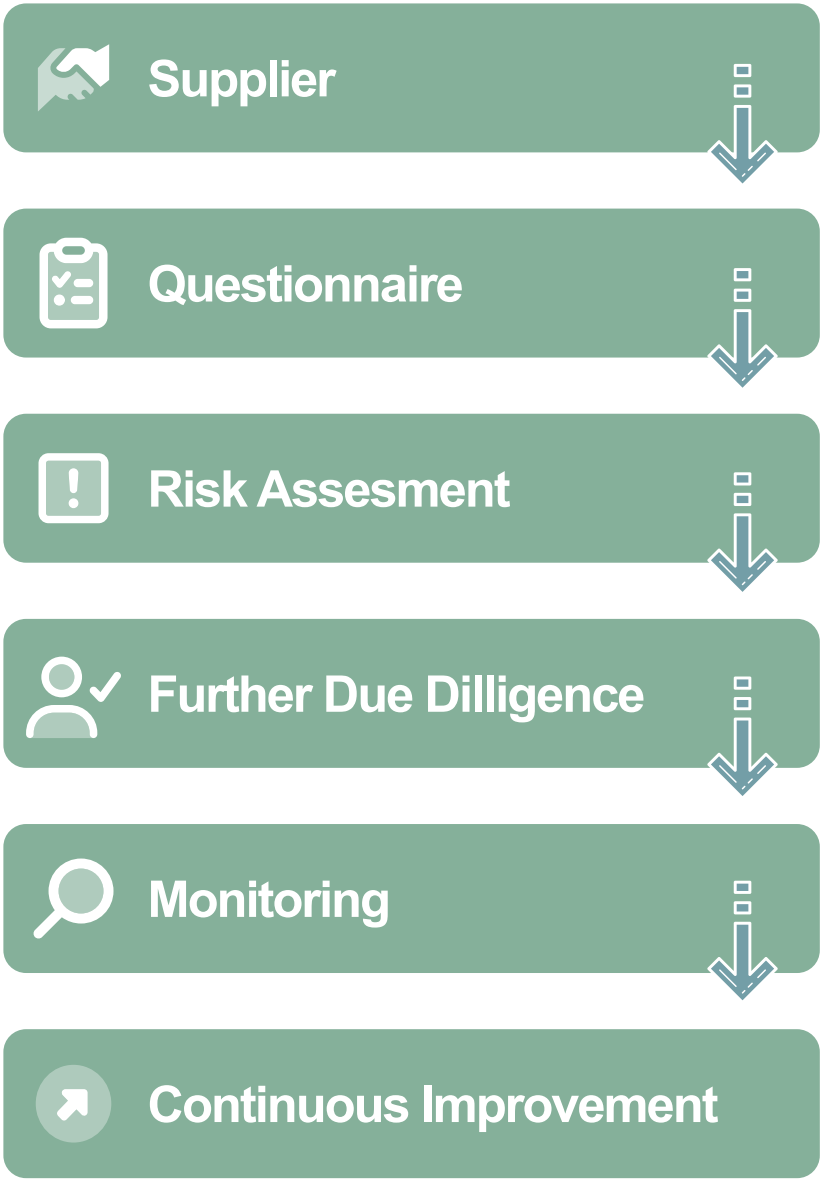
1. Abergeldie pursues the more complex projects.
2. We are serious about safety, quality and the environment.
3. We look for opportunities to innovate. We take initiative.
4. Abergeldie does what it says it will. We are dedicated.
5. We are a team that supports each other.
6. We celebrate success together.

Existing framework

Abergeldie has developed policies that continue to shape the way we behave and operate including ethics, corporate social responsibilities and whistleblower policies which are in unison with our procurement policy. Under the framework of our existing policies, management system and processes, we are already well placed to ensure that modern slavery practices within Abergeldie are unlikely to occur.

Our methodology

In order to continually improve and ensure that modern slavery is not present in our operations or the operations of our supply chain, Abergeldie is incorporating our approach to address the identified risks throughout our procedures, management plan(s) and training system(s). This will ensure that Abergeldie has significant, effective and manageable processes embedded in how we undertake business.



Assessing and addressing risk

Key to ensuring that Abergeldie can assess and address modern slavery risks is our due diligence program for supply chain procurement. Abergeldie takes a proactive approach to eradicating modern slavery risk from our supply chain. Our due diligence process is part of our broader procurement policy and is designed to identify and assess a range of potential risks in the supply chain, including human rights.

Initially, suppliers are requested to complete a brief prequalification questionnaire managed in the Abergeldie Group procurement management system. This process helps us to identify potential areas of risk, and where identified, the supplier will be referred for further due diligence, which may include requiring the supplier to provide relevant policies and procedures or independent site audit reports to dispel any concerns.

As part of our procurement process, all new suppliers, as well as renewing suppliers, are subjected to our due diligence process prior to onboarding or contract award. The risk assessment conducted based on Abergeldie vendor responses showed that 89% (up from 88%) of the supply chain does not obtain goods from countries identified as high risk, 44% (up from 43%) have policies and processes in place to ensure that modern slavery doesn't exist in their operations and supply chains, 18% have a Human Rights Policy (up from 17%) and that 46% undertake checks to ensure child labour is not being used within their organisations or their suppliers.

We prefer, where possible, to work constructively with suppliers to resolve issues instead of ending the relationship with the supplier to enable the proper dissemination of information and understanding of risks, such as modern slavery.

We understand that this will take time and Abergeldie Group is committed to working with its supply chain towards eradicating modern slavery from the construction industry.

Modern slavery initiatives launched

- Implemented the Modern Slavery Policy as part of its CSR Framework
- Provided training in Modern Slavery risks, for Abergeldie staff
- Internal review of the requirements to add to the Supplier and Subcontractor Interview form
- Reviewed the modern slavery questionnaire for suppliers and subcontractors

Assessment of effectiveness

Abergeldie will continue to review the effectiveness of measures implemented to mitigate the modern slavery risks identified into our existing monthly and annual review processes, which includes audits, trend analysis, review of risk assessments to ensure the implementation of our risk control measures is being carried out effectively.

Consultation

Where Abergeldie held a "controlling interest" in an entity during the reporting period, we met with the appropriate organisational representative to frame our expectations, raise awareness and understand their approach in mitigating modern slavery risks. Where Abergeldie did not hold a "controlling interest" (such as in the joint venture entities), but they were nonetheless an entity in which we held a minority equitable interest, we communicated our expectations and offered our assistance where they required further guidance.

We further worked with our legal team to embed modern slavery considerations into their due diligence and commercial/contractual processes.

Over the next year, our key focus areas will be consultation with all relevant stakeholders to further determine the effectiveness of the control measures implemented and to also incorporate any additional risks or control measures identified by the stakeholders into our supplier and subcontractor assessment meetings so that they may assist in continually improving Abergeldie's approach.

Working towards eradicating modern slavery

Abergeldie is committed to operating responsibly and adhering to ethical and social standards. We reject any activities that may cause or contribute towards modern slavery practices and are striving to eradicate all forms of modern slavery globally. Looking forward, we will continue working with our supply chain to improve processes, and remain effective in identifying, preventing and/or mitigating modern slavery as underpinned by our purpose to build better communities.





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COMPLEX INFRASTRUCTURE

Sydney | Newcastle | Dubbo | Brisbane | Gold Coast | Melbourne | Canberra | Auckland