MODERN SLAVERY STATEMENT

UNCONTROLLED WHEN PRINTED

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1. Acknowledgement

Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body and reporting entity and covers the reporting period 26th August 2026 to 23th September 2027.

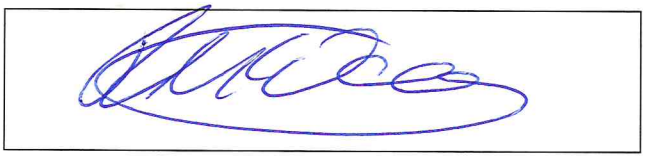
McNally Group Holdings Pty Ltd

as defined by the Modern Slavery Act 2018 (Cth) on

23 September 2026

Signature of Responsible Member

This statement was approved by the Board of Directors of McNally Group Holdings Pty Ltd on 16th September 2026 and signed by a responsible member of the above mentioned principal governing body.



RHYS JARROD McNALLY

DIRECTOR of McNALLY GROUP HOLDINGS PTY LTD

23 SEPTEMBER 2026

Mandatory Criteria

The below table summary indicates where appropriate responses to each criteria item required under Section 16 of the Act can be found within.

Requirement	Page Number
Identify the reporting entity	Page 3
Describe the structure, operations, and supply chains of the reporting entity	Page 3
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Pages 3 & 4
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Pages 4 & 5
Describe how the reporting entity assesses the effectiveness of such actions	Page 5
Describe the process of consultation with any entities that the reporting entity owns or controls	Page 5
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Additional

2. Entity Coverage

McNally Group Holdings Pty Ltd is the parent entity of the McNally Group. The Group conducts its operations through a number of wholly owned or controlled entities and associated business divisions, including the entities identified below. McNally Group Holdings Pty Ltd (ABN 15 159 349 167)

- McNally Group Contracting Pty Ltd (ABN 40 159 349 210)
- McNally Group Pty Ltd (72 134 701 447)
- MC Mardie Pty Ltd (ABN 58 649 422 408)
- McNally Mining and Resources
- McNally Commercial

3. McNally Structure and Operations

McNally Group Holdings Pty Ltd is the parent entity of the McNally Group of companies. The Group operates through a number of related entities that support its construction, manufacturing, mining and resources, commercial and residential activities.

The Group's principal operations are conducted in Western Australia and include the design, manufacture, construction, installation, refurbishment and maintenance of modular buildings and associated infrastructure. McNally's work includes the delivery of modular accommodation villages, mining camps, non-process infrastructure, commercial facilities and residential modular building solutions.

McNally's operations include both off-site manufacturing and site-based construction activities. Modular buildings and components are manufactured and prepared at McNally facilities before being transported to project locations for installation, commissioning and completion. Project activities may also include civil works, building installation, electrical and plumbing services, structural works, logistics, mobilisation, subcontractor management, project management and associated construction services.

McNally delivers projects across metropolitan and regional Western Australia, including remote mining and resource locations. The Group's workforce includes employees, contractors and subcontractors engaged in office-based, manufacturing, construction and project-site activities.

The Group engages a broad range of suppliers, subcontractors and service providers to support its operations. Key procurement and supply categories include:

- building and construction materials, including steel and structural components;
- plumbing, bathroom and sanitary products;
- cabinetry, joinery and associated building materials;
- electrical products and components;
- modular building components and manufactured products;
- plant, equipment, tools and consumables;
- transport, freight and logistics services;
- construction subcontractors and specialist trades;
- labour and professional services;
- cleaning, facilities maintenance and property services; and

- office, technology and general business supplies.

Most McNally's direct suppliers are located in Australia. However, some products, components and raw materials supplied to McNally are manufactured or sourced internationally, either directly or through Australian-based suppliers. McNally recognises that visibility may reduce further down these supply chains, particularly in relation to the country of origin of raw materials and manufactured components.

In assessing its modern slavery risks, McNally considers both risks associated with the procurement of goods and materials and labour-related risks associated with contractors, subcontractors, labour providers and other service providers operating within its supply chain.

4. McNally Supply Chains & Modern Slavery Risks

McNally engages a broad range of suppliers, subcontractors and service providers to support its manufacturing, construction and business operations. These include suppliers of building and construction materials, steel and structural components, plumbing and bathroom products, cabinetry and joinery materials, electrical products, plant and equipment, consumables, transport and logistics services, specialist construction trades, professional services, cleaning, facilities maintenance and general business supplies.

The majority of McNally's direct suppliers are geographically located within Australia. However, McNally recognises that some products, components and raw materials supplied to the business are manufactured or sourced internationally, either directly or through Australian-based suppliers. As a result, some supply chains may extend through multiple tiers and jurisdictions before goods or materials are ultimately supplied to McNally.

McNally assesses modern slavery risk having regard to the nature of the goods or services being supplied, the geographic location from which products or materials are sourced, the use of labour within particular industries, and the level of visibility available across the supply chain.

Goods and Materials

McNally recognises that modern slavery risks may be heightened in supply chains involving the manufacture and sourcing of certain construction products and raw materials, particularly where manufacturing occurs in jurisdictions or industries where labour practices may be more difficult to monitor.

Products currently identified as presenting potentially higher supply-chain risk include plumbing and bathroom products, including showers and basins, cabinetry and cabinet construction materials, and steel coil. Some of these products or their underlying materials are sourced from or manufactured in China and Singapore.

McNally also recognises that an Australian-based direct supplier may itself source products, components or raw materials internationally. Accordingly, the geographical location of McNally's immediate supplier does not necessarily represent the origin of all goods or raw materials within the wider supply chain.

Contractors, Subcontractors and Service Providers

McNally also considers modern slavery risks associated with the provision of labour and services within its operations and supply chain. This includes risks that may arise through subcontracting arrangements, specialist trades, labour providers, transport and logistics services, cleaning and facilities services and other service-based supply arrangements.

These risks may be influenced by factors such as the use of lower-tier subcontracting, temporary or migrant labour, limited visibility over employment practices within a supplier's own workforce or supply chain, and reliance on labour-intensive services.

McNally's direct employment practices are governed by Australian workplace laws and internal employment and workplace policies. However, McNally recognises that reduced visibility may arise where services are delivered through independent contractors, subcontractors or other third-party organisations.

Supply Chain Visibility

McNally acknowledges that its visibility is generally strongest in relation to direct suppliers and contractors and may reduce further down the supply chain. This is particularly relevant where Australian suppliers source manufactured goods, components or raw materials from international suppliers or where multiple tiers of subcontracting are involved.

5. Actions Taken to Assess and Address Modern Slavery Risks

Operations and Suppliers

We continue to adhere to and implement our Modern Slavery Policy; revise and update our internal policies; and continue to review our supplier engagement processes.

We also adhere to our Supplier Code of Conduct and Responsible Sourcing Policy

Supplier Code of Conduct

As a part of our ongoing commitment, McNally will regularly review and update its Supplier Code of Conduct, which is a document that is relevant to all suppliers to McNally. Suppliers are required to adhere to the McNally Supplier Code of Conduct, which includes specific reference to various matters including human rights, anti-bribery and corruption, and modern slavery and human trafficking. Suppliers are expected to have in place a policy recognising, respecting and protecting the human rights of their employees, those of their suppliers and business partners and the communities affected by the suppliers' operations.
McNally's position, which is detailed in its Supplier Code of Conduct, is that suppliers are expected to (without intending to be exhaustive):

- Comply with all laws in respect of the privacy of personal information.
- Comply with applicable laws in respect of employment practices.
- Protect workers from all forms of harassment, including bullying, sexual harassment, coercion, discrimination, victimisation, vilification and physical and verbal abuse.
- Be an equal opportunity employer and eliminate work and employment practices that disadvantage certain groups of people.
- Not discriminate against any worker on the basis of age, disability, ethnicity, gender, marital status, political affiliation, race, religion, sexual orientation, gender identity, union membership or any other status protected by law.
- If worker housing is provided, ensure it meets country of operation and safety standards.
- If workers are transported to the work location, provide appropriate return transportation.

Cooperation with Clients

Our clients in the sectors that we operate in, range in size. That being the case, McNally is familiar with participating in client audits of their respective supply chains. In doing so, McNally is able to observe its clients' own practices on the prevention of modern slavery and learn and adapt these practices to best fit McNally operations.

Engagement with Suppliers

McNally adheres to our Supplier Code of Conduct which is a mandatory document provided to all suppliers involved with the businesses. This document outlines clear expectations to our suppliers on behavioural expectations and adherence to legislative and best practice requirements.

Ability for Employees to Raise Concerns

All McNally employees, suppliers, subcontractor or other external parties have the ability to voice concerns either through local reporting mechanisms or via our external Whistleblower reporting system https://whistleblowingservice.org/mcnally/. McNally is committed to protecting employees when disclosing malpractice and will ensure that all disclosures made are treated confidentially and without fear of retaliation.

It is by receiving and evaluating feedback and maintaining a culture of compliance that McNally can assess the effectiveness of its practices and procedures.

Supplier Due Diligence and Risk Assessment

McNally applies due diligence processes to the engagement and ongoing management of suppliers, subcontractors and service providers. These processes are designed to assist McNally to identify and assess potential modern slavery and broader ethical sourcing risks before and during the course of a business relationship.

As part of McNally's supplier and subcontractor onboarding and prequalification processes, relevant suppliers and subcontractors are required to provide information about their business, operations and compliance arrangements. The level of due diligence undertaken is proportionate to the nature of the goods or services being provided and the potential level of risk associated with the engagement.

McNally's due diligence process includes, where applicable:

1. **Supplier and subcontractor prequalification** – prospective suppliers and subcontractors are assessed prior to engagement through McNally's onboarding and prequalification processes. This assists McNally to confirm appropriate business, compliance and operational information before establishing the relationship.

2. **Modern slavery risk screening** – consideration is given to factors that may increase modern slavery risk, including the nature of the goods or services being supplied, country or geographic origin, reliance on labour-intensive activities, use of overseas manufacturing or sourcing, subcontracting arrangements and the level of visibility available across the supply chain.

3. **Supplier Code of Conduct and Responsible Sourcing requirements** – suppliers and subcontractors are required to comply with McNally's Supplier Code of Conduct and relevant responsible sourcing requirements. These establish McNally's expectations in relation to lawful and ethical business practices, human rights, employment practices, modern slavery and human trafficking.

4. **Contractual requirements** – where applicable, McNally incorporates contractual requirements relating to compliance with applicable laws, ethical conduct and McNally's supplier requirements into its procurement and subcontracting arrangements.

5. **Supplier questionnaires and information requests** – McNally may require suppliers and subcontractors to provide information regarding their operations, workforce, supply chains, sourcing practices, policies and controls. This information assists McNally to understand the supplier's approach to identifying and managing modern slavery risks.

6. **Monitoring and audit** – supplier and subcontractor compliance may be monitored through ongoing engagement, document reviews, questionnaires, audits and other assurance activities.

7. **Escalation of identified concerns** – where information obtained through prequalification, questionnaires, audits, reporting mechanisms or ongoing supplier management identifies a potential concern, the matter is escalated for further assessment. McNally may seek additional information, undertake further investigation, require corrective action or increase monitoring depending on the nature and seriousness of the concern.

6. Assessing the Effectiveness of the Actions Taken

Our focus continues to be to gain a better understanding of our modern slavery risks and how such risks may be present in our operations and supply chains.

We will continue to work on developing frameworks and processes to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply. These frameworks will allow us to review, audit and report on the effectiveness of our affirmative actions in relation to modern slavery risks across our supply chain.

7. Entity Consultation

In preparing this Modern Slavery Statement, McNally Group Holdings Pty Ltd consulted with the entities it owns or controls that are covered by this Statement.

The consultation process involved relevant representatives from across the McNally Group reviewing and contributing information about their operations, supply chains, identified modern slavery risks and the actions undertaken during the reporting period to assess and address those risks.

As part of the preparation of this Statement, the entities were provided with information regarding the reporting requirements of the *Modern Slavery Act 2018 (Cth)* and were consulted regarding:

- the structure, operations and supply chains of the relevant entities;
- actual and potential areas of modern slavery risk within their operations and supply chains;
- the policies, procedures and controls used by McNally to manage those risks;
- supplier and subcontractor engagement and due diligence processes;
- mechanisms available for reporting concerns or suspected modern slavery practices;
- actions taken during the reporting period to assess and address identified risks; and
- opportunities to improve McNally's approach to modern slavery risk management.

Information obtained through this consultation process was considered in the preparation of this Statement and in determining the actions and priorities described within it.

The final draft of the Statement was reviewed by appropriate representatives of the McNally Group prior to being submitted to the principal governing body of McNally Group Holdings Pty Ltd for approval.