

APOLLO

**MODERN SLAVERY
STATEMENT 2025**

July 2024 – June 2025



Apollo Property Group Modern Slavery Statement FY 2025

This Statement is submitted on behalf of Apollo Property Group Pty Ltd (ABN 30 151 819 895) (**Apollo**) under section 13 of the *Modern Slavery Act 2018 (Cth)* (**MSA**) for the reporting period of 1 July 2024 to 30 June 2025. It represents Apollo's second Modern Slavery Statement, building upon the foundations established in our inaugural FY2024 report.

During this reporting period, Apollo continued to strengthen its governance structures, refine internal policies, and embed sustainable and ethical practices across its operations and supply chains. Several key initiatives are in progress and which will reach full maturity in the 2025–2026 financial year, and significant advancements have been made in the way we understand, assess, and respond to modern slavery risks.

Progress Since Our First Statement

In our first Modern Slavery Statement (FY2024), Apollo acknowledged that it met the reporting threshold for the first time in May 2024. Since that time, we have advanced several initiatives to strengthen our approach:

- **Board Appointment and Governance Alignment** – Apollo formally appointed its Board of Directors on 1 July 2024, enhancing governance oversight and accountability across all compliance areas, including modern slavery. The Directors assumed direct leadership of **Operations, Finance, and Project Delivery**, ensuring clear lines of responsibility.
- **People & Culture Leadership** – A People & Culture / Stakeholder & Operations Manager was appointed in January 2024, reinforcing Apollo's commitment to ethical leadership, workforce wellbeing, and supplier engagement.
- **Health, Safety, Environment and Quality (HSEQ) Structure Strengthening** – The HSEQ Advisor role now reports to the HSEQ Manager, providing enhanced oversight and integration between safety, quality, and compliance systems.
- **Policy Development** – Implementation of the Whistleblower Policy progressed, with the framework now approved and planned for activation early in FY2026.
- **Supplier Due Diligence** – We strengthened our supplier onboarding and assurance processes by digitising our workflow and implementing Eftsure, an end-to-end payment protection software for vendor identity and banking verification. As part of this uplift, modern slavery risk questions and supplier declarations have been fully integrated into our electronic Vendor Onboarding Form, with all responses captured and securely stored within the Eftsure platform. This enhancement supports Apollo's procurement governance framework and aligns with the organisation's ISO-certified management systems and OFSC-accredited assurance requirements, which form an important foundation for our participation in Defence and government procurement activities.
- **External Engagement** – Apollo continued working with external modern slavery experts to refine its policies, improve supply chain visibility, and develop staff awareness resources.

These developments reflect Apollo's commitment to continuous improvement and transparency as we evolve from a first-year compliance response to an embedded ethical business practice.

Identification, Structure, Operations and Supply Chain (MSA ss16(1)(a), 16(1)(b))

1.1 Structure

Apollo is 100% owned by corporate trustee LCB Holdings Pty Ltd (**LCB**) for the LCB Investment Trust. LCB also wholly owns Apollo Group Services Pty Ltd and LCB Enterprises Pty Ltd. Apollo Group Services Pty Ltd is the employing entity of all Apollo staff. LCB Enterprises Pty Ltd is an investment and holding company– it does not trade or have any employees. These entities do not meet the MSA reporting threshold. Apollo itself does not own or control any entities.

1.2 Operations

Apollo is a privately owned proprietary limited Australian construction company established in 2008. We deliver projects across Defence, childcare, health, education, hospitality, industrial, and commercial sectors, with offices in Brisbane, the Gold Coast, and Townsville.

Apollo has offices in Brisbane, the Gold Coast and Townsville and has worked on sites throughout Queensland including in Brisbane, Stradbroke Island, Townsville, Redcliffe, the Wide Bay and Burnett Region, Warwick and more. Apollo, in the reporting period, had 78 permanent employees, with no casual staff or independent contractors and no employees working in an arrangement where their visa ties them to Apollo. The only investments Apollo holds are term deposits which are used as security for bank guarantees.

1.3 Supply Chain

Our operations are supported by network of subcontractors and suppliers engaged across multiple project sites. During the reporting period, we directly engaged with over 1123 Tier 1 suppliers, being those suppliers we directly contract with. These included suppliers of a range of goods and services including:

- raw materials such as steel, timber, asphalt, diesel, glass, aluminium and concrete;
- hire and purchase of fencing, barriers, formwork, scaffolding, tools, equipment and machinery;
- consumable items such as bottled water, catering, etc;
- furniture, information and technology software and hardware;
- construction based services including: construction subcontracting, engineering services, architects, landscaping, asbestos removal, demolition experts, soil testing, surveyors, bricklayers, plumbers, electricians, cabinet makers, painters, carpenters, craneage, earthworks, building certifiers, acoustics consultants, air conditioner contractors, air quality specialists, environmental consultants and animal care, construction cleaning services, fire safety services and emergency management, marketing signage and printing services, traffic control, freight and transport services, pest control, waste and recycling services, and health and safety services;
- General business services including information and technology services, accounting, alarms and security services, cleaning services, recruitment services and labour hire.

In the reporting period, all of Apollo's suppliers were located in Australia. We recognise that our supply chain extends past our tier 1 suppliers - and that these suppliers may source goods or components from global supply chains that may present higher risks.

We generally contract with the majority of suppliers under short to long-term agreements, depending on the nature of the goods or services provided. Contract durations vary, with subcontracts typically aligned to the specific scope and timeframe of each project, which may be as short as six weeks for fit-out or extend over the life of larger projects. Consultancy agreements

are also established for specialised professional services, while longer-term arrangements are generally reserved for strategic service agreements, such as with our Managed IT provider, software-as-a-service platforms, and other key partners. We subcontract works across a range of trade areas, including structural, electrical, mechanical, hydraulic and finishing trades. We also engage labour hire, waste management and traffic control providers under relevant supply or service agreements to support project delivery. All supplier and subcontractor engagements are managed through Apollo's ISO-certified Integrated Management System, which embeds structured procurement, contract management and compliance processes.

2 Risks of Modern Slavery (MSA s16(1)(c))

We recognise that the construction sector globally is associated with elevated risks of forced labour and other modern slavery practices. We understand that every entity has modern slavery risks and identifying those risks is crucial. Apollo's key potential risk areas are detailed below.

2.1 Operational risks

We understand that some of the reasons behind construction being a high-risk industry include:

- by nature it is a project based industry, this means contracts with clients are temporary in nature resulting in the associated workforces being more vulnerable to redundancies and therefore at higher risk of exploitation;
- it is a very cost-driven sector and monetary pressures can lead to wage cuts, forced overtime and other cost-saving measures;
- its heavy reliance on subcontracted work (including out-sourcing overseas) reduces oversight of labour risks and increases the complexity of operations;
- the workforce is often located across many different sites that change year to year making sufficient supervision of conditions a more laborious task;
- reliance on manual labour which according to statistics is commonly undertaken by more vulnerable workers such as workers on visas, workers on more transient employment arrangements and in certain instances low skilled workers;
- construction supply chains are often complex and include international sourcing as well as the manufacture and production of raw and building materials both of which are known to be associated with poor working conditions and forced labour.

Without acknowledging these risks inherent in our industry, we cannot properly take part in efforts to combat modern slavery.

Fortunately, Apollo has a relatively small workforce with under 100 staff meaning oversight of our staff working conditions is more attainable. All of our staff are on permanent contracts meaning we do not have a workforce with multiple levels of vulnerability; for example we did not have any workers on a visa, nor did we hire any independent contractors in the relevant reporting period. We have detailed below the actions we take to address risks in our supply chain and with our subcontractors.

We also acknowledge that we utilise recruitment services and labour hire firms. We understand that this has been generally associated with higher risks of practices like debt bondage due to the reduced oversight entities have over their staffing, employment contracts and employment conditions when utilising recruiters.

2.2 Supplier Risks

We understand construction supply chains often contain a number of high-risk goods and services. Like any entity, Apollo can contribute to or be directly linked to modern slavery practices through our own supply chains. Every entity risks contracting with a supplier that is engaged in modern slavery practices if proper processes are not put in place. Entities must also be aware of conducting operations in a way that may facilitate or incentivise modern slavery, such as by placing unreasonable timing or budgetary pressures on suppliers – especially in construction where these pressures are inherent.

Of our tier 1 suppliers, all are located in Australia, which is a low-risk geographic location for modern slavery according to the Global Slavery Index 2023. Australia has a prevalence of 1.6 people per 1,000 living in conditions of modern slavery according to those estimates and has the lowest prevalence in Asia and the Pacific. Our government response to modern slavery is rated high and we understand that potential changes to our legislative framework are underway to further progress the government response. Despite this, Australia still imports approximately \$26 billion of products at risk of modern slavery and we understand that these practices do occur on our shores.

We acknowledge that we engage with the following categories of suppliers that are identified in the literature as posing a higher risk of modern slavery: recruitment agencies, raw materials, tools/equipment/machinery, furniture, information and technology hardware, subcontracted construction services, cleaning and security services. We are seeking expert assistance on mapping our supply chains in order to increase our understanding of any risks within same in future reporting periods.

3 Actions to Assess and Address Modern Slavery, Effectiveness (MSA ss16(1)(d), 16(1)(e))

Apollo takes steps to assess and address the risks of modern slavery occurring in our operations and supply chains.

3.1 Governance and Leadership

Apollo's governance structure was strengthened in FY2025 through the appointment of a Board of Directors, who now provide strategic oversight of Apollo's ethical, financial, and compliance obligations. The Board includes representatives responsible for Operations, Finance, and Project Delivery, ensuring clear accountability across all key business areas.

Apollo's organisational leadership continues to prioritise a people-first culture, with the recent appointment of the People & Culture / Stakeholder & Operations Manager role and the alignment of HSEQ functions under a single management framework.

3.2 Policies and Culture

Apollo's governance systems are underpinned by our ISO certified Integrated Management System (IMS) and a suite of interlinked policies that reinforce ethical behaviours and compliance, including:

- Modern Slavery, Ethical Business and Anti-Corruption Policy
- Code of Conduct Policy
- Whistleblower Policy (pending rollout FY2026)
- Equal Opportunity and Diversity Policy
- Recruitment and Labour Hire Guidelines
- Grievance and Performance Management Policies
- Health, Safety, Environment and Quality (HSEQ) Policies
- Psychosocial Policy;

- Learning and Development Policy;
- Fitness for Work Policy;
- Attendance and Leave Policy;
- Alcohol, Drug & Smoking Policy;
- Personal Information Policy;
- Workplace Behaviour Policy;
- Flexible Work Policy;
- Risk Management Policy;
- Privacy Policy.

These frameworks are supported by the leadership of Apollo's Board and senior management, the Systems & Compliance team, and the HSEQ and People & Culture functions.

Modern Slavery Policy

Our Modern Slavery, Ethical Business and Anti-Corruption Policy was rolled out in 2022 and is applicable to all staff across Apollo. This policy is provided to all staff during onboarding and is readily available on the company intranet. It contains our commitment to ensure there is transparency in our operations and approach to tackling modern slavery. This policy contains a definition of modern slavery and refers to human rights generally. We reiterate to staff that they must not directly or indirectly engage with any form of modern slavery and that we have a zero-tolerance approach to these practices. We advise staff of their responsibility to prevent, detect and report on risks, how to raise concerns, how we ensure we protect those who report on issues and how we enforce the policy in the event of any breach. Reporting under this policy or queries and feedback we receive on it is one of the mechanisms we have in place for assessing the effectiveness of our approach.

Code of Conduct

Our Code of Conduct sets out the standards expected of our staff and provides a broad framework that underpins our culture. Staff have a responsibility to report any behaviour contrary to the policy. We also require our staff to ensure third parties comply with our policies. The code generally speaks to ethical dealings, honesty, openness, fairness, respect, quality work, punctuality, supporting other staff, meeting legal obligations, conflicts of interest and bribery. It also lists out actions that are considered serious misconduct. This document sits alongside our Modern Slavery, Ethical Business and Anti-Corruption Policy and generally speaks to creating a good culture of looking after our people to ensure our foundations are not supportive of any poor practices that could escalate into modern slavery over time.

Reporting Avenues

We acknowledge that the nature of modern slavery means victims are often unable to speak up, are silenced, unable to report or seek help.

Apollo's new Whistleblower Policy establishes a safe and confidential mechanism for reporting unethical conduct, including modern slavery concerns. Once active, it will be monitored to assess reporting effectiveness and employee confidence in using the system.

We are aware of the tension in tracking such reports and that a lack of reporting does not necessarily mean lack of risk but may be an indicator of lack of awareness or safety to report.

Health, Safety and Wellbeing

We encourage our staff to report incidents, near misses, potential hazards or any weakness that impact the health, safety and wellbeing of our workers. Apollo has an in-house Health, Safety Environment and Quality (**HESQ**) team that works closely with the Systems and Compliance team to uphold our safety, quality and environmental standards across all operations. HESQ advisors maintain a regular presence on site to provide guidance, conduct inspections and support project team in applying these standards in practice. This on-the-ground engagement, combined with

broader compliance oversight, helps us monitor and continuously improve the effectiveness of our health and safety systems. We also maintain a dedicated internal intranet resource library which staff can access to stay updated on the latest safety bulletins from industry bodies such as Master Builders and Safe Work Australia.

We offer Workplace Options EAP to our employees, a confidential and complimentary counselling service. Our partnership with MATES, a not-for-profit charity providing suicide prevention through community development programs helps us promote mental health awareness. We have 11 MATES Connectors within Apollo and have training programs designed to equip our Connectors with the skills to recognise the signs when a teammate may be facing mental health challenges. We also have a range of social and community events to support and empower our employees, which include an Annual Social Program which aims to foster a positive and enjoyable workplace culture along with our Annual Awards which help us celebrate and recognise the achievements of our staff.

First Nations Australians

Apollo understands that first nations people in Australia live with the legacy of intergenerational experiences of conditions and practices which we today call modern slavery. In the reporting period, we invited traditional Custodian Derek Oram Sandy to again perform the Welcome to Country Ceremony at our Apollo annual event. We are proud of our Reconciliation Action Plan (available on our website) leading our journey to build meaningful partnerships with Aboriginal and Torres Strait Islander peoples, fostering shared history understanding. The Apollo leadership team has a deep desire for the business to actively contribute to achieving reconciliation in Australia.

Licences and Accreditations

We hold the following licences and memberships:

- Queensland Building and Construction Commission Licenced Contractor – Open
- State of New South Wales Licenced Contractor
- Master Builders Queensland Member – supporting a profitable and sustainable building and construction industry
- National Association of Women in Construction Member – helping champion and empower women in the construction related industries
- MATES in Construction partner – aiding in suicide prevention through community development programs and by supporting workers on sites
- Green Building Council Australia Member – advocating for the sustainable transformation of the built environment

We are proud to be accredited with the highest and most stringent building and construction safety scheme in Australia, the OFSC. In addition to this, we have the following accreditation:

- ISO 45001 – Occupational Health and Safety Management Systems
- ISO 9001 – Quality Management Systems
- ISO 14001- Environmental Management Systems
- ISO 27001 – Information Security Management Systems
- OFSC – Australian Government Building and Construction Workplace Health and Safety Accreditation Scheme
- PQ3 Level 3 – Prequalification to undertake building projects for Queensland Government
- CM3 – Recognised Workplace Health and Safety Management System Certification
- ISN – Recognised WHSEQ and Management Systems pre-qualification and vetting platform for major companies.
- Smartek – compliance management
- Rapid Global – safety and compliance

Each of these licences and accreditations forces us to take steps to mitigate a great range of risks in our workplace to ensure our people are safe and looked after, and that we are diligent regarding the suppliers and subcontractors that we work with.

Supporting Vulnerable Communities

We have also created a comprehensive Corporate Social Responsibility program that guides our commitment to ethical practices and social initiatives. Apollo is committed to making a meaningful difference by actively supporting initiatives across different sectors and we partner with a range of charities. These initiatives provide support for vulnerable members in the communities we live and work in. We know that those living with vulnerabilities are at an increased risk of being exploited through modern slavery practices.

3.3 Training and Awareness

Apollo is developing awareness resources for staff and subcontractors to build understanding of modern slavery risks, indicators, and reporting pathways. The program will be rolled out progressively during FY2026, starting with training modules in our company LMS, key procurement and site management personnel.

3.4 Supply Chain Management

During FY2025, Apollo continued integrating modern slavery due diligence into supplier and subcontractor management processes:

- Modern slavery clauses remained a standard requirement in Apollo's contract precedents. These clauses define modern slavery and require a number of warranties from our contractors including that their conduct will not constitute modern slavery, that they will take all reasonable steps to ensure there is no modern slavery in their supply chains, that they will maintain their own policies and procedures to ensure compliance with modern slavery laws and that they will promptly notify us if they become aware that modern slavery is taking place. We also require contractors to assist us in our efforts by providing modern slavery information and assistance to us as requested. Finally, the clauses reiterate that adverse action cannot be taken against anyone disclosing information in good faith relating to modern slavery.
- Our contracts otherwise require our suppliers to comply with all applicable Australian laws and workplace health and safety requirements. We also require that suppliers do not subcontract any work without our prior written approval and hold discretion to refuse to provide this. This enables us to maintain oversight and keep our suppliers and subcontractors accountable to our standards.
- New suppliers were required to provide modern slavery-related information through Apollo's onboarding questionnaires.
- Apollo's ISO-certified Integrated Management System (IMS) continued to govern procurement and subcontractor engagements, including pre-award vetting, contract approval and oversight of subcontracting arrangements. This structured approach supports accountability within the supply chain and promotes compliance with Australian legal and workplace standards.
- During FY2025, Apollo also undertook preliminary planning for enhanced supply chain risk mapping, anticipated to commence in the next reporting period. This work included early engagement with external experts to shape a methodology and identify risk factors relevant to Apollo's procurement profile, such as geographic sourcing, industry labour practices and exposure to imported materials. This planning is intended to inform a more risk-based approach to supplier monitoring and engagement in FY2026 mapping supplier categories according to modern slavery risk tiers.

3.5 Effectiveness of Actions

To assess our progress and the effectiveness of our actions, Apollo is developing indicators and metrics such as:

- Number and percentage of suppliers completing modern slavery declarations.
- Number of staff trained in modern slavery awareness
- Instances of concerns reported and resolved; and
- Progress in Tier 2 supply chain mapping

4 Consultation (MSA s16(1)(f))

Apollo does not own or control other entities, so no internal consultation was required for this statement. Key stakeholders were involved in the preparation of this statement and consultation with external modern slavery experts also occurred.

5 Future Commitments

Looking ahead, Apollo's priorities for the next reporting period (FY2026) include:

- Finalising and launching the Whistleblower Policy and modern slavery awareness training.
- Implementing supplier due-diligence questionnaires within the IMS.
- Enhancing Tier 2 and Tier 3 supplier visibility.
- Establishing key performance indicators for ethical sourcing and supplier compliance.
- Continuing engagement with industry bodies and external experts to align with best practice

6 From Our Principal Governing Body

Apollo makes this Statement in accordance with section 13 of the *Modern Slavery Act 2018* (Cth). Apollo's Board of Directors is the principal governing body for the purpose of the MSA.

This Modern Slavery Statement was considered and approved of by the Board of Apollo.



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Responsible Member of Apollo's Principal Governing Body

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