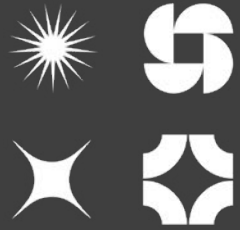




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Texco Construction FY25 Modern Slavery Statement



Modern Slavery Statement

December 2025

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Introduction



At Texco, we believe respecting and protecting human rights enables individuals, societies and businesses to flourish. Our approach to identifying and managing the risk of modern slavery is guided by our commitment to respect human rights across our business operations and supply chain.

As part of that commitment, we do not tolerate any form of coercion, deception, threat, or worker exploitation that undermines the individual and collective freedom of our employees and the workforce throughout our supply chain. Additionally, we hold our employees accountable for acting with integrity, respect and transparency and to respond to noncompliance with laws and regulations.

This Modern Slavery Statement is prepared by Texco Group Pty Ltd (ACN 666 393 700) (“Texco”) and covers its subsidiaries and related entities*.

In this Statement, we describe the risks of modern slavery in our

operations and supply chain and show our commitment to upholding human rights by detailing the measures we will adopt and implement, and the policies, systems and processes we will use to continually assess and address our modern slavery risks.

This Statement has been prepared in accordance with the requirements in the Modern Slavery Act 2018 (Cth) for the reporting period 1 July 2024 to 30 June 2025.

Subsidiaries and related entities include:

- Texco Contracting Pty Ltd (ABN 15 663 976 770)
- Texco Construction (VIC) Pty Ltd (ABN 89 626 365 071)
- Texco Construction (NSW) Pty Ltd (ABN 73 628 207 312)
- Texco Construction (QLD) Pty Ltd (ABN 87 613 103 709)
- The WeBuilt Unit Trust (ABN 24 665 364 119)



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Structure and Operations

Structure and Operations



Texco is a privately owned commercial and industrial construction specialist providing integrated design and construct services across Victoria, New South Wales, South Australia and Queensland.

Established in Melbourne in 2011, over the past 14 years we have built a reputation for delivering industry-leading commercial and industrial facilities for Australia's most prominent REIT's, developers and owner-occupiers. We are a proud contributor to Australia's industrial property landscape. It's a market that rewards hard work, genuine relationships, high performance, innovative thinking and collaboration and these are the values that guide our approach.

We directly employ a workforce of over 180 employees in both Victoria and New South Wales. All our employees are directly employed under individual employment agreements or our NSW Enterprise Agreement & VIC Enterprise Agreement.

We are committed to being responsive to our clients' needs and working with them to align our activities regarding upholding human rights and making continuous improvements to our modern slavery program. Our business operations require us to forge relationships with our partners that are mutually built on integrity, transparency and sound ethical practices. To ensure we are all focused on upholding our obligations under the Act, the conversation around addressing the risks of Modern Slavery is being had with our clients, suppliers and subcontractors.

Our office locations:

VIC Office (registered office)
1 Hall Street
HAWTHORN EAST VIC 3123

NSW Office
1.01 182-184 Bourke Road
ALEXANDRIA NSW 2015



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Supply Chain

Supply Chain



Our business operations require engagement and collaboration with numerous suppliers and subcontractors throughout the construction process. This presents a risk to our business being exposed to modern slavery either directly in our operations or indirectly through our suppliers and their supply chains.

We engage with a select number of preferred suppliers and subcontractors who undertake work onsite. The majority of these businesses are small to medium enterprises that do not have accountabilities under the Act. Regardless of their obligations, we recognise the importance of assessing and preventing the risk of modern slavery from occurring via these channels.

As such, during the procurement process, we perform a robust supplier and subcontractor selection process that is built upon compliance with all modern slavery regulations and

legislation as well as ensuring a win, win from a commercial standpoint. Some key areas of focus in the selection process are:

- Compliance with relevant legislation and government-mandated standards;
- Health and safety compliance and track record;
- Compliance with environmental requirements;
- Performance track record verified via industry references; and
- Financial health checks

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Risk Assessment

Risk Assessment



We have continued the process of assessing the risk of Modern Slavery in our supply chains by completing our ongoing desktop review of current and new suppliers and subcontractors.

Our key controls are exercised through procurement selection and onsite delivery management.

We continue to invest in technology and procurement methods that improve screening, monitoring and management of suppliers.

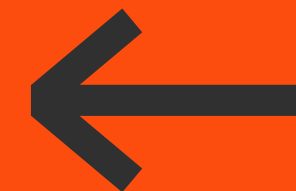
Construction remains a high-risk sector for modern slavery exposure. Main methods of management are:

1. Supplier onboarding includes non-negotiable verification steps before engagement.
2. Texco management maintains a constant site presence supported by defined processes and procedures.

3. ISO certification in safety, environmental and quality management reinforces our proactive approach to risk.

Key make up of Texco's Risk:

- Spending footprint for FY25 was circa \$575M
- Approx 65% of the spend related to operations in VIC
- Approx 35% of the spend related to operations in NSW
- Spending is made up of company employees, materials, subcontractors and incidental suppliers.



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Corrective Actions

Corrective Actions



Incidents identified

Texco did not identify any modern slavery incidents in FY25 across our operations and supply chains.

External reviews

During the year, our entities responded to RFIs from external stakeholders conducting due diligence on award compliance and payroll practices.

Payroll controls

Our integrated HRIS and payroll system enables accurate, timely reporting. Where a payroll discrepancy is identified, Texco commits to back-paying any underpayments in line with the relevant award as soon as practicable and confirming remediation with affected workers.

Policies and procurement

We continue to strengthen policies and procedures governing spend, supplier onboarding and procurement. Updated expense management and procurement software helps ensure businesses we engage are identifiable and verified against relevant registers such as ASIC, ABNs and insurances in place.

Governance

Texco continues to talk through modern slavery in multiple forums including quarterly senior management meetings.

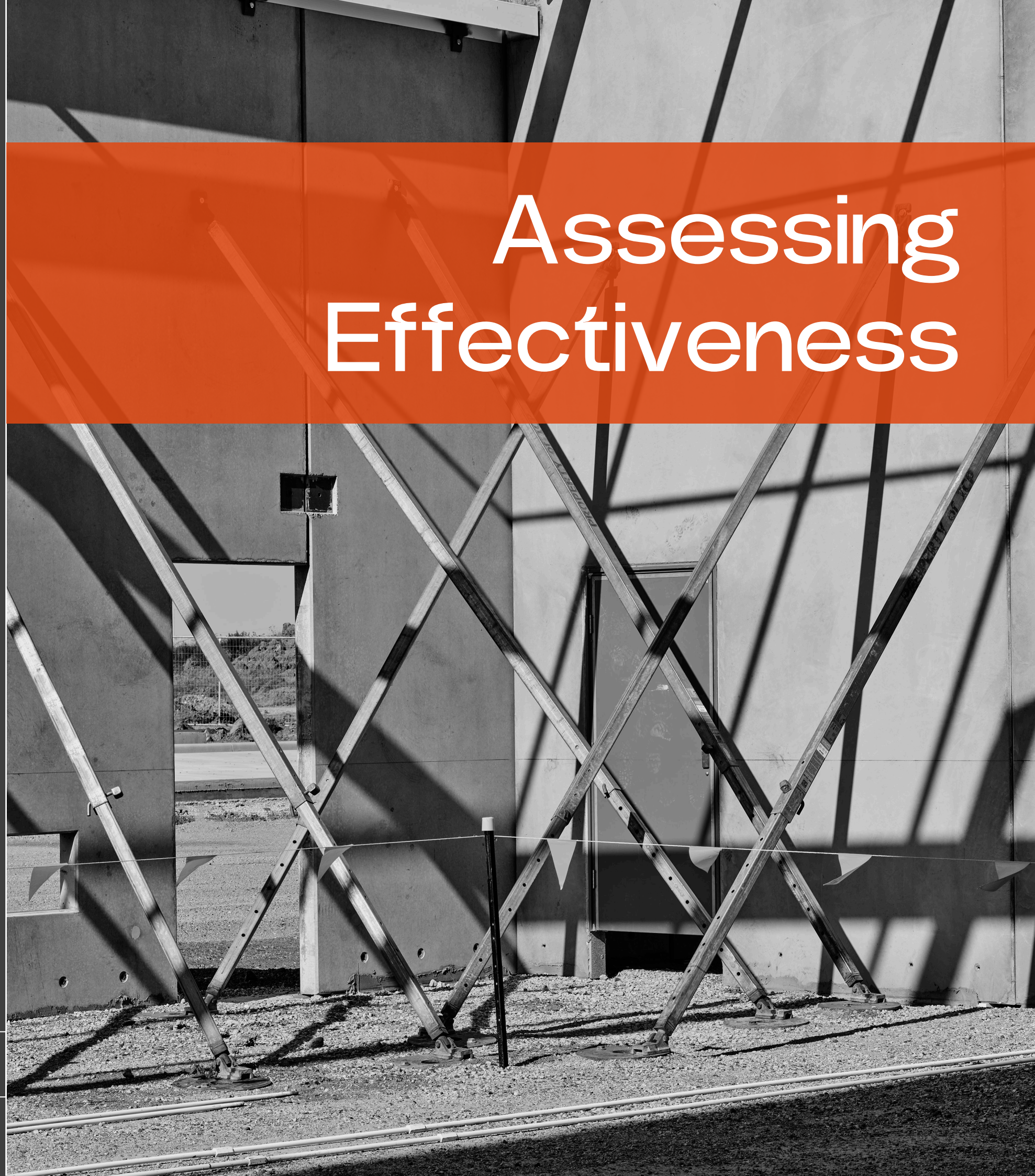
Grievance mechanism

A dedicated reporting channel (report@texco.net.au) is available to employees, subcontractors and site workers for raising modern slavery concerns.

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Assessing Effectiveness



Assessing Effectiveness



We measure effectiveness throughout the year using external feedback, internal feedback and independent checks.

Client feedback

Formal RFIs and project tenders returned only positive comments on our modern slavery management.

Payroll integrity

Financial audits and client RFIs were completed with no adverse findings. Any payroll discrepancies identified were remediated and evidenced through back payments and worker confirmation.

Contract clauses

All new and renewed subcontracts include a modern slavery compliance clause with flow down to lower tiers and a right to audit.

Internal assurance

ISO audits, subcontractor RFIs and governance meetings test our controls and drive corrective actions where needed.

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Continual Development

Continual Development



We are committed to strengthening our approach to modern slavery risk management. Over the coming period we intend to:

Policies & governance

Develop and adopt a standalone Modern Slavery Policy, supported by a Modern Slavery Charter for suppliers and subcontractors.

Supplier due diligence

Introduce a Due Diligence Self-Assessment Questionnaire for new subcontractors, consultants and suppliers, and review our subcontract, consultancy and labour hire templates to include modern slavery clauses.

Training & awareness

Roll out modern slavery awareness training for procurement staff, site supervisors and senior management, and embed acknowledgement of the Modern Slavery Policy into new-starter inductions.

Supply chain visibility

Map our top subcontractors by spend and identify higher-risk product categories and any offshore sourcing exposure to focus our due diligence effort.

Consultation: This Statement was prepared by Texco's People & Performance and Finance teams. The Senior Leadership team and relevant stakeholders were consulted to understand and map our supply chains, assess our operations and prepare this Statement.

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Approval

Approval



We are proud to publish our FY25 Modern Slavery Statement covering the period from 1 July 2024 to 30 June 2025, and we are committed to continuing to assess, measure and publicly report on our progress in the years to come.

This statement was approved by the board of Texco Group Pty Ltd.



Matthew Barker
Director of Texco Group



Thomas Bull
Director of Texco Group



Jack Bull
Director of Texco Group

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