

1. Introduction

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) by BowdenCorp Pty Ltd (“the Company”) and covers the reporting period from 1 July 2023 to 30 June 2024. It outlines the actions we have taken to assess and address risks of modern slavery in our operations and supply chains.

BowdenCorp is committed to conducting business ethically and responsibly. We recognise our role in identifying and mitigating modern slavery risks, and we are dedicated to improving transparency and accountability in our business practices.

We also acknowledge that BowdenCorp is required to submit its modern slavery statement within 6 months from the end of each reporting period.

2. Our Business and Operations

BowdenCorp is a private commercial construction company operating across Victoria. Our operations are based in metropolitan and regional Victoria, with offices in Melbourne, Geelong, Warrnambool and Bendigo.

Our services include construction project management, design and construct, and general contracting.

We employ approximately 95 direct staff and engage a network of subcontractors and suppliers across various trades and services.

3. Our Supply Chains

Our supply chain includes:

- Construction materials (concrete, timber, steel, fixtures, etc.)
- Subcontracted trade services (electrical, plumbing, carpentry, etc.)
- Professional services (engineering, architecture, surveying)
- Corporate and operational services (IT, recruitment, PPE, cleaning, etc.)

We source goods and services locally and internationally. Some materials and products may originate from countries with higher modern slavery risks, particularly in the manufacturing of construction materials, textiles (PPE), and electronics.

4. Risks of Modern Slavery Practices

We recognize the construction industry is at higher risk of modern slavery due to factors such as:

- The use of subcontracted labour and recruitment agencies.
- Sourcing of raw materials from regions with vulnerable labour practices.
- Complex supply chains with limited visibility.

Potential risks in our supply chain include:

- Force labour in the production of building materials.
- Exploitation of migrant workers in subcontracting arrangements.
- Poor working conditions in offshore manufacturing.

5. Actions Taken to Assess and Address Risks

We acknowledge the risks of modern slavery practices in our operations, supply chain and BowdenCorp is committed to mitigating modern slavery risks through the following actions:

- Policies and governance: Ongoing implementation of our Anti-Slavery and Human Trafficking Policy
- Supplier engagement: Including modern slavery clauses in supplier contracts and prioritizing engagement with suppliers who demonstrate compliance with ethical standards.
- Training and awareness: Provide modern slavery awareness training for employees and key-decision makers.
- Grievance mechanisms: Maintain accessible reporting mechanisms for employees, suppliers and subcontractors, and investigate all reports of potential modern slavery promptly and take corrective action where necessary

6. Measuring Effectiveness

We use the following indicators to assess the effectiveness of our actions:

- Monitoring and auditing supplier compliance with our standards (eg number and quality of supplier assessments completed, percentage of contracts with modern slavery clauses)
- Incidents or grievances reported
- Completion rates for staff training on modern slavery awareness

We are in the process of developing further metrics to better track our progress.

7. Consultation and Continuous Improvement

This statement was prepared in consultation with key departments across our business, including procurement, human resources, and project delivery teams.

We are committed to continual improvement and will further integrate modern slavery risk management into our overall corporate governance and procurement practices.

8. Approval

This statement was approved by the Director of BowdenCorp Pty Ltd on 29 May 2025.



James Bowden
Director