

Modern Slavery Statement 2024

July 2023 – June 2024

Built

Built Modern Slavery Statement FY 2024

Built is a national diversified general contractor and developer operating across Australia, with two overseas satellite offices in New Zealand and the United Kingdom. Built works across all major property sectors including commercial, defence, health, hotels and hospitality, data centres, social infrastructure, industrial and entertainment & recreation. Built's core area of operation is building construction, including development and fitout and refurbishment.

This Modern Slavery Statement (MSS) is prepared pursuant to the Modern Slavery Act 2018 (Commonwealth) and the Modern Slavery Act 2015 (UK). It sets out the actions taken to assess and address modern slavery and human trafficking risks in our business and supply chain for the financial year ending 30 June 2024.

About this Statement

Built Group Holdings Pty Limited submits this Statement as a joint statement pursuant to section 14 of the Modern Slavery Act 2018 on behalf of itself and its subsidiaries who are reporting entities being:

- Built Construction Operations Pty Limited
- Built Construction Holdings Pty Limited
- Built Holdings Pty Limited
- Built Pty Limited
- Built QLD Pty Limited

Built Fitout and Refurbishment Limited submits this Statement pursuant to section 54 of the Modern Slavery Act 2015.

Summary of Approach and Progress to Date

This is Built's fifth MSS and summarises actions taken to improve its response across its operations to the requirements set out in the Act. Built continued to refine its approach to both Modern Slavery risk mitigation and Social Procurement opportunity identification and analysis within its supply chain to drive positive procurement outcomes. Guided by its Built Worthy corporate values, Built refined and

expanded its approach to supplier due diligence to capture a greater cross section of suppliers and mitigate slavery risks associated with labour on construction sites and construction materials.

Built continued to work across FY2024 to embed these practices throughout its operation and supply chain. Built has given its project teams, guided by the Sustainability and Social Impact department, a mandate to identify and address instances of modern slavery and modern slavery risk, supported by industry best practice guidance and methodologies.

Built's vision is that the collective and cumulative actions taken in previous years, and as outlined in this MSS, will drive the progressive reduction of modern slavery risk within its supply chain.

Australian and UK Reporting Criteria

The following sections set out Built's response to each of the mandatory criteria listed in section 16(1) of the Australian Modern Slavery Act 2018 and the recommended criteria listed in Section 54(5) of the UK Modern Slavery Act 2015.

UK Act: Section 54(5)	Australian Act: Section 16(1)
Structure and supply chains	Mandatory criteria (a) & (b): Structure, Operations & Supply Chain
Risk assessment and management	Mandatory criteria (c): The Risks of Modern Slavery
Policies in relation to slavery and human trafficking Due diligence processes in relation to slavery and human trafficking Training on modern slavery and trafficking	Mandatory criteria (d): Actions Taken for Assessment of and Addressing Risks, Due Diligence and Remediation
Effective action taken to address modern slavery	Mandatory criteria (e): Measuring Effectiveness

Mandatory Criteria (a) & (b): Structure, Operations & Supply Chain

This MSS relates to proprietary limited construction and development businesses that trade predominantly under the Built trading name, which are ultimately controlled by a privately owned entity Built Group Holdings Pty Limited (ACN 163 462 637).

Built also operates a commercial property development business known as Built Capital, with construction undertakings procured in NSW and Vic to date. In NSW, Built is delivering one major project in a joint venture with Obayashi Corporation.

In addition, Built operates a joinery manufacturing business located in Qld through Mayneline Joinery Pty Ltd.

Built's operations directly employ approximately 1,250 staff in corporate, project delivery, and manufacturing (Mayneline) roles. Whilst Built's supply chain includes the procurement of typical goods and services required to operate and administer a business, Built's supply chain spend is dominated by the contracted supply and installation of construction related materials, plant and equipment, and services procured via its main Australia-based contracting entities Built Pty Ltd, Built Qld Pty Ltd, and Mayneline Joinery Pty Ltd. The consolidated revenue for these three entities was circa \$1.94bn for the FY2024 reporting period, representing some 96% of the overall controlling entity revenue.

The aforementioned materials, plant, equipment and services originate from both Australia and overseas. Built's supply chain was made up of just under 5,000 distinct suppliers and contractors across FY24 who were directly engaged by Built on a project-by-project basis, with a spend of \$10k or more with over 3,200 of those suppliers and contractors.

Mandatory Criteria (c): The Risks of Modern Slavery

The Risk of Directly Causing Modern Slavery

Built's operations where labour is directly engaged are limited to its Australian, New Zealand, and UK businesses. As Built's labour engagement and management policies and practices are structured strictly in accordance with the relevant laws, the risk of Built directly causing modern slavery is considered low.

The Risk of Contributing to Modern Slavery

Built continues to acknowledge that its businesses are at risk of contributing to modern slavery through its operations and/or actions in its supply chains. This includes acts or omissions that may facilitate or incentivise modern slavery through commercial pressures. Such risks may continue to materialise and evolve because modern slavery is a growing global problem with local impact and a human cost, exacerbated by economic pressures. This poses risks to Built in terms of the potential to unknowingly and unintentionally contribute to modern slavery conditions through material sourcing or use of labour in the supply chain. However, as Built's procurement practices are governed by a multi-layered approval process, this risk is considered an unlikely occurrence.

Direct Link to Modern Slavery

Built continues to acknowledge that it is at risk of being connected to modern slavery through the activities of other entities that Built has business relationships with, namely suppliers and contractors. Further, supply chain partners of direct suppliers and contractors also present risk. Given the diversity and depth of parts of Built's supply chain, it is links of this nature that are considered Built's most significant risk of exposure to modern slavery.

In particular, the risks of modern slavery are most likely to arise from:

1. Materials sourced from overseas regions at risk of modern slavery; and
2. Local trades where unskilled or semi-skilled labour is sourced.

Mandatory Criteria (d): Actions Taken for Assessment of and Addressing Risks. Due Diligence and Remediation.

The actions taken by Built to assess and address the risks of modern slavery in FY2024 were a continuation of the approach and actions taken in FY2023, which laid the foundations for an existing program of works and system of monitoring that continue to reinforce due diligence and remediation measures. Building on the policies and mechanisms that were introduced 12 months prior, the following summarises key updates to the existing mechanisms that remain integrated into Built's operating framework, and integral to the success of modern slavery risk management, while disclosing any noteworthy new actions taken:

- Supplier Code of Conduct
- Sustainable Procurement Policy
- Whistleblower Policy
- Modern Slavery Hot Spot Analysis
- Engaging with Suppliers and through Built's Project Delivery Framework
- Rolling out the Informed 365 platform (a collaborative initiative of the Property Council of Australia) for supplier surveying
- Training Modules

A summary of each of the above is provided on the next page.

Supplier Code of Conduct

The Supplier Code of Conduct remains in place as a key policy instrument that sets Built's minimum expectations and non-negotiable requirements of all participants in its supply chains in relation to:

- human rights and labour practices;
- environmental management;
- professional conduct;
- governance; and
- community engagement.

The Supplier Code of Conduct is publicly available and shared with all suppliers at the onboarding stage and is included in contractor engagement contracts.

Sustainable Procurement Policy

The Sustainable Procurement Policy is a key instrument in which Built can engage its suppliers through a considered approach to procurement. By publishing the Sustainable Procurement Policy, Built affirms its commitment to sustainable procurement and outlines its business and human rights expectations for its multitiered supply chain.

Built recognises that as a leading contractor in the construction industry, it can play a pivotal role in encouraging sustainable environmental and social procurement practices within its supply chains as well as working with suppliers and subcontractors to address its obligations under the Modern Slavery Act.

Built has a strong commitment to sustainability and social procurement practices across its operations and projects. The Sustainable Procurement Policy outlines Built's public commitment and expectations of employees, subcontractors and suppliers in three key areas including environmental sustainability, social procurement and modern slavery.

Whistleblower Policy

The Whistleblower Policy sets out Built's commitment to the reporting and investigation of misconduct or improper states of affairs or circumstances such as those not aligned with Built's Supplier Code of Conduct and Sustainable Procurement Policy. The policy, which complies with the requirements of the Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 provides employees, supply chain participants, and clients the opportunity to report suspected instances of modern slavery anonymously and with appropriate protections.

There were no reported instances in FY2024 of misconduct pertaining to modern slavery via the multiple reporting avenues afforded under Built's Whistleblower Policy.

Modern Slavery Hot Spot Analysis

Built previously completed an analysis of potential modern slavery 'hot spots', which involved both external experts and an internal consultation committee, including key members of the construction delivery team. The Modern Slavery Hot Spot Risk Analysis was updated by an independent specialist to ensure Built is working with the latest information from global databases. The Modern Slavery Hot Spot Risk Analysis is a key reference point for other actions and initiatives described in this Modern Slavery Statement and has subsequently been integrated into Built's Sustainable Procurement Plan. This facilitates a risk assessment based on the scope of each project, while identifying high risk trades or materials based on known or emerging hot spots. By embedding the hot spot analysis in such a way, Built provides a pathway for the engagement of trades and suppliers considered to be higher risk. Moving forward, the in-built capabilities of the Informed 365 platform will be utilised to evaluate trade contractors and suppliers on their relative risk of contributing to modern slavery through their operational location and industry risk rating system.

In addition to engaging with its own supply chain to complete a self-assessment questionnaire on Informed 365, Built has also completed one and received a risk rating of 3 out of 5 (with 1 being the lowest).

Engaging with our Suppliers and through our Project Delivery Framework

Built continued its engagement with its supply chain partners throughout FY2024 to identify modern slavery risks and take a collaborative approach with

its suppliers and clients in addressing risks and promoting continuous improvement.

Built directly engaged its top suppliers, prioritising efforts based on spend value and obtained completed detailed modern slavery assessment questionnaires. These questionnaires are developed and hosted on the Property Council of Australia's common platform for modern slavery risk mitigation. Informed 365 and can be shared with multiple suppliers, increasing data consistency and quality, and enabling suppliers to greater focus on efforts on actual upstream supply chain due diligence.

The Built Modern Slavery Hot Spot Risk Analysis continues to be used when bidding for key projects to evaluate trades at risk of modern slavery exposure. If specific risks are identified that are a consequence of client materials preferences, consideration is given to suggesting potential mitigation measures, including proposing lower risk alternative selections. Provided the opportunity, these issues are discussed with clients to influence an outcome aligned with Built's commitment to reducing modern slavery.

During project delivery, identified high risk trades are onboarded to the Informed 365 platform for response and evaluation by Built prior to engagement. Where risks are identified, mitigation strategies are explored, including investigation of alternative materials or, if risk cannot be sufficiently mitigated through the trade contractor, alternative contractors.

The actions outlined above has resulted in more than 400 trade contractors and suppliers being captured by the self-assessment questionnaire and platform.

Rolling out the Property Industry Platform for Modern Slavery

As mentioned in previous sections, as part of its efforts to continue to streamline modern slavery risk assessment, mitigation and reporting, Built conducted a review of available digital solutions that could provide an integrated, industry-specific solution to addressing the concerns of modern slavery in its construction supply chain while ensuring compliance with the Modern Slavery Act. Informed 365, an Australian-based technology company specialising in sustainability outcomes including management of modern slavery risk, was deemed to be a fit-for-purpose application and the preferred platform for the Property Council of Australia, the peak body representing the domestic Australian property industry. By engaging with the same platform, Built has improved the consistency

and quality of data collected and improved analysis and reporting functionality while further streamlining and simplifying the reporting process, and work proactively with clients and suppliers across the property and construction industry to mitigate risk. Built has now obtained supplier self-assessments through Informed 365 from 356 direct, tier 1 suppliers, collectively responsible for 50% of Built's subcontracted spend in FY2024 and additionally obtained supplier self-assessments through Informed 365 from 57 upstream suppliers and manufacturers with whom Built's suppliers or suppliers' suppliers have engagement.

The Informed 365 platform now includes 44 major property industry corporates as paid members all issuing the same self-assessment questionnaire to their suppliers to drive consistency and credibility in the mitigation of risk of modern slavery within their collective supply chain.

Training Modules

The online Modern Slavery Act training module, which was released in FY2022 and made available to all Built direct employees, had a completion rate of 91.04% across the business in FY2024. The training module is designed to give Built employees an overview of the Modern Slavery Act, explain how Built is responding under its reporting obligations, as well as outlining what is expected of each staff member. As Built further develops its capabilities to identify and mitigate risk, additional training modules may be developed in alignment with changes to process or procedure, aimed at increasing awareness on modern slavery and improving Built's ability to respond effectively.

Mandatory Criteria (e): Measuring Effectiveness

Built's response to modern slavery continues to be incorporated into its operating framework, facilitating the following ongoing opportunities to measure effectiveness:

- The entire framework is subject to a Continual Improvement program in which content owners continually assess effectiveness and implement improvements.
- Built's Internal Audit program measures compliance with our operating framework.
- The record keeping required by the framework will enable analysis of effectiveness year on year, including in instances where specific modern slavery risks are identified.

- Within the Informed 365 platform, suppliers are required to update their responses to the questionnaire annually and regular updates are made to the questionnaire by Informed 365 through consultation with the property industry consortium, of which Built is a contributing member.
- Continuously reviewing the percentage of spend with our tier 1 suppliers (directly engaged) who have completed the Informed 365 self-assessment questionnaire vs overall supplier spend.
- Awareness training includes mandatory assessment of attendee understanding of content.

Mandatory Criteria (f): Consultation with Entities

Consultation and collaboration with the various entities that are the subject of this MSS has been undertaken as follows:

- Content owners of each of the impacted disciplines in Built's operating framework have been actively involved in formulating Built's response to modern slavery. For example, the Commercial discipline which oversees all subcontracts and supply agreements in Built's contracting businesses assisted in the formulation of relevant aspects of the response in consultation with a group of commercial discipline managers across the various entities and business units.
- The response in relation to Built's manufacturing facility (Mayne Joinery) was formulated in collaboration with the entity managers to ensure the risks associated with its supply chain were appropriately addressed.

Mandatory Criteria (g): Other Relevant Information

External Collaboration

Built forms part of the monthly Informed 365 property industry consortium, meeting with other members of the Australian property supply chain to be informed on updates to the Modern Slavery Act, best practice modern slavery mitigation actions and to engage with the peer group to share details on how each member is managing modern slavery risk within their respective organisations.

Built has nominated to form part of the Property Council of Australia's Continuous Improvement Planning Committee, which will see members of

Australia's property industry who subscribe to the common Informed 365 platform able to consolidate improvement requests of their common suppliers as a collective to drive more consistent improvement across the supply chain.

During this reporting period, Dexus, a major client of Built on multiple projects, met with Built's SSI team to learn about how modern slavery has been addressed within the Atlassian Central project being delivered by Built under joint venture with Obayashi. Dexus and Built are collaborating on a case study of the approach taken to mitigate modern slavery risk on the project. Collaboration with Dexus, a leader in the property sector, is expected to lead to learnings for both parties and better alignment of commitment to reducing modern slavery risk.

Next Steps

Continued implementation of the actions outlined in this MSS and measuring the effectiveness of Built's actions has been, and will continue to be, a focus during the next reporting period (July 2024 – June 2025). Built will continue to engage its stakeholder groups to seek opportunities for improved awareness, due diligence, and cooperation amongst all parties. Additionally, Built acknowledges the potential for risk within suppliers to suppliers of Built. To this end, Built will scale efforts to identify upstream entities that operate within high-risk hot spots and procure assessment of their modern slavery risk.

With Built's significantly improved reach of supplier reporting across its supply chain issued through Informed 365, Built anticipates greater transparency and the potential to highlight and mitigate high risk procurement activities to continuously improve its supply chain due diligence.

Approval of this Modern Slavery Statement

This statement has the approval of the Statutory Board.



Marco Rossi
CEO & Managing Director