



# Modern Slavery Statement



Freyssinet Australia Pty Ltd  
FY2025

# MODERN SLAVERY STATEMENT

This statement is made by Freyssinet Australia Pty Ltd (ABN 15 002 617 736) (Freyssinet) for the financial year ending 30 June 2025, in accordance with the *Modern Slavery Act 2018* (Cth) ('Act').

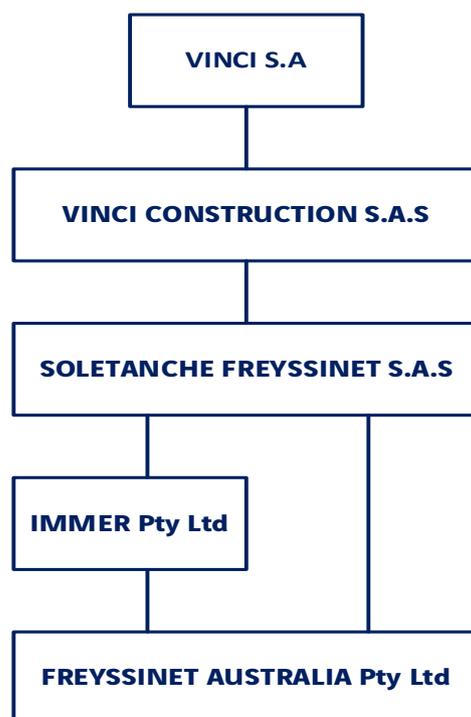
Freyssinet's executive are committed to the highest standards of ethical conduct and integrity in the organisation's business activities in Australia and New Zealand. This statement is published with the support of our Board of Directors and created with input from members of the Business.

## 1. Freyssinet's Business

Freyssinet Australia Pty Ltd (**Freyssinet**) is majority owned by Soletanche Freyssinet SA. Soletanche Freyssinet is a world leader in specialized civil engineering, offering expertise in the design and construction of soil, structural, and nuclear projects. The company's work includes building and reinforcing structures like bridges, dams, and nuclear power plants, as well as improving and monitoring ground conditions for a wide range of infrastructure projects.

Soletanche Freyssinet SA is a wholly owned subsidiary of VINCI SA (**VINCI**). VINCI is a global leader in concessions, energy, and construction, operating in over 120 countries. The company's main activities include designing, building, financing, and managing infrastructure like roads and airports through its concessions business, and providing construction and energy services through its contracting business.

Freyssinet provides specialised engineering services and solutions for the construction, repair and maintenance of structures in multiple sectors, such as transport, mining, energy, water and building. A high level depiction of Freyssinet's place within the VINCI corporate structure is as follows:



## 2. Our Operations & Supply Chains

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### 2.1. Structure and Operations

Freyssinet consists of two business divisions - Remedial and Civil. The Remedial Division employs techniques to restore or extend the life of ageing structures such as conventional concrete repair and protection and structural steel repairs and protection using specialised coating systems. The Civil Division specializes in bridge construction methods.

Freyssinet operates in Australia and works closely with its sister company Freyssinet New Zealand Ltd (NZBN 9429 040 492 582) ('**FNZ**'). FNZ is also owned by Soletanche Freyssinet SA. Freyssinet and FNZ have a common Australian Director, John Marchese and a common French Director, Jean-Philippe Ricard. Freyssinet does not control or own any entities. Therefore, this statement does not cover any other entities.

Freyssinet has offices in Sydney, Newcastle, Melbourne, Brisbane, Adelaide, Mackay and Perth, while FNZ has offices in Auckland and Wellington. Freyssinet employs over 350 people across these locations, of which approximately:

- ✔ 136 are professional / technical staff;
- ✔ 28 are administrative staff;
- ✔ 71 Managers; and
- ✔ 115 are other workforce.

### 2.2. Supply Chains

Freyssinet engaged approximately 1920 direct domestic and international suppliers and subcontractors in 2025, providing materials, equipment and services for its projects. The key areas of spend include:

- ✔ building material - steel, concrete, cables, anchors and bearings;
- ✔ equipment hire - jacks, scaffolding, cranes and trucks;
- ✔ labour hire; and
- ✔ specialist consultancy services for design, testing and certification.

The international suppliers that Freyssinet engage are based in the United States of America, Germany, Hong Kong, Singapore, the United Kingdom, Thailand, Malaysia, India, China, South Africa, New Zealand, Italy and France.

Freyssinet has a diverse customer base across Australia and operates in a number of varied markets. Customers include: asset owners (public and private); utility authorities; State and Local Government Authorities; investment trusts and developers. The markets we work in include building, marine structures, roads and bridges, water and rail and mines and quarries.

## 3. Understanding our Modern Slavery Risks

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Freyssinet recognises that modern slavery is a serious human rights issue that can occur in any industry or country. Modern slavery refers to situations where one person deprives another person of their freedom or exploits them for personal or commercial gain. This includes slavery, servitude, forced labour, debt bondage, human trafficking, child labour and other forms of exploitation.

Freyssinet is committed to conducting its business in an ethical and responsible manner and respecting the human rights of all its stakeholders. Freyssinet has a zero-tolerance policy towards any form of modern slavery in its operations and supply chain.

Freyssinet has conducted a risk assessment to identify and assess the potential areas of exposure to modern slavery in its operations and supply chain. The risk assessment was based on various factors, such as the nature of the industry, the geographic location, the type of supplier, the level of control and influence, and the availability of information.

### 3.1. Operations

The risk assessment revealed that the overall residual risk of modern slavery in Freyssinet's operations is low, as Freyssinet operates mainly in Australia and New Zealand and within countries that have strong legal frameworks and enforcement mechanisms to protect human rights and labour standards. Freyssinet also has robust policies and procedures to ensure compliance with applicable laws and regulations, as well as to promote a culture of integrity and respect among its employees.

### 3.2. Supply Chain

Freyssinet procures goods and services from both within Australia and overseas. Locally sourced goods present a lower risk of modern slavery. Whereas certain low skilled services and imported goods have a higher risk of modern slavery, for example in the production of garments, apparel, and personal protective equipment (PPE); the supply of raw materials, electronic products and steel fabrication; and the provision of certain services including labour hire.

The risk assessment indicated that the residual risk of modern slavery in Freyssinet's supply chain is moderate, as some of Freyssinet's suppliers are located in countries that have higher prevalence or vulnerability to modern slavery. These include China, India, Malaysia, Thailand and Vietnam. These countries are known to have issues such as poverty, corruption, weak governance, lack of transparency and accountability, inadequate labour laws and enforcement. Some of the products or services sourced from these countries may also involve high-risk sectors or activities, such as steel production, mining, construction and manufacturing. Freyssinet also uses subcontractors with limited visibility of their supply chains.

## 4. Assessing & Addressing the Risks of Modern Slavery

We are dedicated to ensuring there is transparency in our business and in our approach to combatting modern slavery in all our operations. We expect the same high standards from all our subcontractors and suppliers.

Freyssinet has taken the actions described below to address the risks of modern slavery in our operations and supply chain.

### 4.1. Policies and Procedures

Our organisation has several policies and procedures in place that protect our workers from unfair treatment and promote an inclusive workplace. They clearly state how we operate and the steps we take to ensure we are a transparent and inclusive organisation. Freyssinet has adopted various policies that reflect its commitment to ethical business conduct and respect for human rights. These include:

- ✔ **Freyssinet's Modern Slavery Policy:** This policy promotes a zero-tolerance approach to all forms of modern slavery, including forced labour, human trafficking, and child labour; provides for transparency through annual reporting, ongoing review, and continuous improvement to ensure the effectiveness of its anti-slavery measures; and commits to providing safe and reasonable working conditions for employees.
- ✔ **Freyssinet's Welfare on Site Policy:** This policy sets out the minimum safety and welfare standards required for all Freyssinet projects, regardless of local regulations. It mandates that all site workers must have access to adequate welfare facilities—including toilets, washing and rest areas, drinking water, first aid, and designated smoking areas—planned and maintained from the outset of every project. The policy emphasizes Freyssinet's responsibility for worker welfare, even if our clients fails to provide compliant facilities on site.
- ✔ **Freyssinet's Whistleblowing Policy:** This policy encourages employees and other stakeholders to report any suspected or actual misconduct or wrongdoing within Freyssinet or its supply chain. It provides a confidential and secure channel for reporting and protects whistleblowers from any retaliation.
- ✔ **Soletanche Freyssinet's International Labour Accommodation and Welfare Standards:** The policy sets out Soletanche Freyssinet's minimum global standards for worker accommodation, aiming to ensure safe, healthy, and dignified living conditions for all international workforce members, regardless of location. The standards are aligned with International Labour Organization recommendations and must meet or exceed local legal requirements. The policy mandates regular audits, management procedures, and representative committees to ensure compliance and continuous improvement, with a strong emphasis on health, safety, and respect for cultural diversity.
- ✔ **VINCI Code of Ethics and Conduct:** This policy is adopted and implemented by VINCI subsidiary companies, including Freyssinet, and sets out the core values and principles that guide Freyssinet's behaviour and decision-making. It covers topics such as compliance with laws and regulations, anti-corruption, health and safety, environment, diversity and inclusion.
- ✔ **VINCI's Human Rights Policy:** This policy is adopted and implemented by VINCI subsidiary companies, including Freyssinet, and outlines Freyssinet's respect for human rights as defined by the Universal Declaration of Human Rights and other relevant international standards. It covers topics such as:

- non-discrimination,
- freedom of association,
- fair wages,
- working hours,
- prevention of harassment,
- child labour,
- forced labour,
- human trafficking.

- ✓ **VINCI's Guide on Human Rights:** The guide identifies five key areas where the Group's activities can impact human rights: labor migration and recruitment practices, working conditions, living conditions, human rights practices in the value chain, and local communities. It provides practical guidelines on issues such as recruitment fees, contract substitution, wage levels, working hours, health and safety, accommodation standards, freedom of movement, risk identification, and community engagement. The guide emphasizes a progressive, non-coercive approach, encouraging continuous improvement, awareness, and dialogue to ensure that social, environmental, and societal value are integral to VINCI's global performance and long-term impact.
- ✓ **Other Policies:** Freyssinet also have a number of other policies that protect our workers from unfair treatment and promote an inclusive workplace, including an Equal Employment Opportunity & Discrimination Policy, Aboriginal and Torres Strait Islander Inclusion Policy, Secure Local Job Code Obligation Policy, Recruitment Policy and a Policy Against Workplace Bullying.

In addition to the policies and procedures above, Freyssinet ensures compliance with applicable Fair Work legislation and the minimum requirements of relevant Awards. Employment contracts are reviewed regularly to reflect changes in legal obligations and employee entitlements. Freyssinet is committed to protecting the rights of workers by maintaining transparent employment practices, adhering to industrial relations standards, and engaging in good-faith negotiations for Enterprise Bargaining Agreements. These agreements are designed to provide fair wages, safe working conditions, and equitable benefits for all staff.

## 4.2. Social Value Commitment

Freyssinet is committed to delivering economic, social, and environmental value to the communities in which we operate. As part of this commitment, we recognize the importance of combating modern slavery in all its forms within our operations and supply chains.

Our social value commitment can be categorized into four themes:

- ✓ **Inherent Social Value:** Value created through the delivery of core services, such as the repair and construction of highways, structures, and buildings.
- ✓ **Embedded Social Value:** Value created as a company through employing and developing people while ensuring that all employment practices align with our ethical standards.
- ✓ **Additional Social Value:** Collaborating with clients and stakeholders to deliver value to communities, while actively working to prevent exploitation in our supply chains.
- ✓ **Environmental Sustainability:** Consistently seeking initiatives to minimize our environmental impact, ensuring that sustainability efforts also consider ethical sourcing and production.

Through these efforts, Freyssinet reaffirms its dedication to creating a socially responsible and ethically sound operating environment.

## 4.3. Due Diligence

Aside from the modern slavery risk assessment described above, Freyssinet also undertakes an annual risk assessment for the purposes of its accreditation by the Office of the Federal Safety Commissioner which is reported in its Company Risk Register, which includes a component for workplace planning and relations, of which the Modern Slavery Policy is a feature.

Freyssinet has implemented a due diligence process to assess and monitor its suppliers' compliance with its policies and standards on human rights and modern slavery. This process involves the following elements:

- ✔ **Supplier Code of Conduct:** This document sets out the minimum requirements that Freyssinet expects from its suppliers in relation to human rights and modern slavery. It covers topics such as compliance with laws and regulations, anti-corruption, health and safety, environment, diversity and inclusion, child labour, forced labour, human trafficking.
- ✔ **Supplier Questionnaire:** This document collects information from suppliers on their profile, policies, practices and performance on human rights and modern slavery. It helps Freyssinet to identify and evaluate the level of risk and compliance of each supplier.
- ✔ **Supplier Audit:** This is a verification process that involves site visits, interviews, document reviews and observations to verify the information provided by suppliers and to identify any gaps or issues that need to be addressed.
- ✔ **Supplier Corrective Action Plan:** This is a remediation process that requires suppliers to implement corrective actions to resolve any non-compliance or improvement areas identified during the audit. It also involves follow-up audits to monitor the progress and effectiveness of the corrective actions.
- ✔ **Supplier Screening Software:** Freyssinet uses a supplier screen software called WATSON to review those suppliers who the business considers are high risk (based on value and type of works, product or supply). The software utilises a World Check tool to assess if a supplier has been convicted or sanctioned under law or regulatory enforcements, that include checks for "modern slavery" and adverse internet/media checks that can identify if a supplier has been involved in modern slavery practices.
- ✔ **Duty of Vigilance Plan:** Each year VINCI publishes a Compliance Plan which outlines the Group's comprehensive approach to identifying and preventing risks related to human rights, (among other things) across its global operations, subsidiaries, and supply chain. the plan details robust governance, risk mapping, and continuous improvement processes, emphasizing local adaptation and stakeholder engagement. Key measures include proactive human rights risk assessments and audits, responsible recruitment practices, and strong whistleblowing mechanisms.

## 4.4. Training

Freyssinet requires mandatory human rights training to be undertaken by its employees as part of their induction and provides awareness programs to its employees on human rights and the impacts of our projects on human societies via e-learning modules. These training programs are available in 6 different languages and aim to increase the knowledge and understanding of the issues, risks and responsibilities related to human rights and modern slavery. They also aim to enhance the skills and capabilities of employees to prevent, detect and report any incidents or concerns of human rights and modern slavery.

## 4.5. Template Downstream Contracts

Freyssinet's template downstream contracts require our subcontractors and suppliers to agree to obligations in relation to modern slavery legislation. In particular subcontractors and suppliers are required to warrant that they are not subject to any convictions or investigations with respect to modern slavery, and they are required to supply information, documents and submit to interviews to discharge Freyssinet's obligations arising under modern slavery legislation. These obligations are used to promote legal compliance, enable transparency and to ensure that Freyssinet's supply chain shares similar ethical business practices which prevent involvement with modern slavery.

## 5. Assessing Effectiveness

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Our assessment of the effectiveness of the actions that Freyssinet has taken to assess and address modern slavery risk is evidence based and includes monitoring and then analysing the annual risk assessment results, the closeout of corrective action plans and review of training participation. The data once analysed shapes our annual planning process for the following year. The actions taken to address modern slavery risks throughout VINCI Group are also regularly monitored by dedicated committees and reinforced by collaborative initiatives, transparent reporting, and ongoing dialogue with employees, partners, and external stakeholders to ensure effective risk mitigation and sustainable business practices.

Freyssinet has planned the following activities in 2026 to identify and address the risk of modern slavery to our employees and suppliers:

- ✔ review and consider improving our supplier questionnaire for modern slavery issues;
- ✔ review and consider improving our Modern Slavery Policy;
- ✔ review and improve our downstream contract templates and the requirements regarding modern slavery.

## 6. Annual Submission, Ongoing Engagement & Communication

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This statement will be submitted to the Australian Government's Online Modern Slavery Statements Register in accordance with the Act.

Freyssinet will continue to engage with Government, industry, regulators and other organisations to build awareness and understanding to combat modern slavery.

Engagement is a key input to Freyssinet's continuous focus on modern slavery risks and developing a trusted supply chain.

## 7. Statement Development, Approval & Signature

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Freyssinet does not own or control any other entities. This statement has been reviewed and approved by the Board of Freyssinet Australia, the Managing Director and Company Secretaries of Freyssinet Australia on 8 December 2025.

Signed by: **Giovanni Carlo Marchese**

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Managing Director of Freyssinet Australia Pty Ltd

Date: 8 December 2025

## OUR GLOBAL NETWORK



**LATIN AMERICA** - Argentina, Brazil, Chile, Colombia, Costa Rica, El Salvador, Guatemala, Honduras, Mexico, Nicaragua, Panama, Paraguay, Peru, Venezuela

**NORTH AMERICA** - Canada, Guadeloupe, Martinique, United States of America

**EUROPE** - Austria, Belgium, Bulgaria, Czech Republic, Estonia, France, Germany, Hungary, Ireland, Italy, Lithuania, Luxembourg, Macedonia, Monaco, Netherlands, Poland, Portugal, Romania, Russia, Serbia, Slovakia, Slovenia, Spain, Sweden, Switzerland, Ukraine, United Kingdom

**AFRICA** - Algeria, Egypt, Ethiopia, Ivory Coast, Morocco, Reunion, South Africa, Tunisia, Zambia

**ASIA** - Azerbaijan, Bangladesh, Cambodia, China, Georgia, Hong Kong, India, Indonesia, Iraq, Israel, Jordan, Kazakhstan, Kuwait, Malaysia, Oman, Pakistan, Philippines, Qatar, Saudi Arabia, Singapore, South Korea, Thailand, Turkey, United Arab Emirates, Vietnam

**OCEANIA** - Australia, New Zealand

## OUR NATIONAL NETWORK

### **SYDNEY**

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### **MELBOURNE**

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### **HOBART**

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### **BRISBANE**

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### **NEWCASTLE**

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