



TOTAL CONSTRUCTION HOLDINGS PTY LTD (ABN 69 131 766 820)

FINANCIAL YEAR 2024/25 STATEMENT OF COMMITMENT

to the *Modern Slavery Act 2018*

3 December 2025

Reporting Entity and Structure

Total Construction Holdings Pty Ltd (hereafter “Total”, “we”, “our”, “us”) provides this statement on behalf of both of its wholly owned subsidiaries, Total Construction Pty Ltd (ABN 32 067 732 941) and Total Special Projects Pty Ltd (ABN 19 137 910 840).

We operate under a shared governance structure, with unified management systems, policies, and procedures across all subsidiaries.

Operations and Supply Chain

We are an Australian construction company with permanent state offices in New South Wales, Victoria and Queensland. We conduct our delivery operations solely within Australia using innovative construction solutions across the aged care, health, food & beverage, commercial, industrial and education sectors. We strive to work with clients and other stakeholders who are aligned with our core values of: Accountability | Integrity | Mentorship | Respect | Collaboration | Ingenuity.

Our supply chain includes: - Subcontractors providing construction works including any required skilled and base skill labour, suppliers of building raw materials and products, and professional service providers.

We acknowledge that extended and complex supply chains, particularly those involving imported materials, may present modern slavery risks.

Identification of Modern Slavery Risks

We pride ourselves on our strong commitment to ethical business practices. To this effect, our leaders and employees are all committed to our core purpose of making a positive difference in people’s lives through excellence in construction, including by extension our corporate responsibility to align with practices that identify and manage modern slavery risks.

In alignment with Section 16 of the Modern Slavery Act 2018, we have considered risks that may arise in our operations and supply chain. The most relevant categories include:

Operational Risks

- Use of base-skill labour that may involve workers vulnerable to exploitation
- Reliance on subcontracted labour with varying employment practices

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Supply Chain Risks

- Materials originating from overseas jurisdictions with known modern slavery concerns
- Limited transparency in multi-tier supply chains
- High-risk product categories such as steel, manufactured components, and PPE

Actions Taken to Assess and Address Risks

Consistent with the Act's Section 16 reporting Criteria, our actions include:

- Governance and compliance
- Dedicated People & Culture department ensuring full compliance with employment and industrial relations legislation
- Third-party certified ISO45001 Work Health and Safety Management System
- Accredited by the office of Federal Safety Commissioner.

Training and Awareness

- Mandatory modern slavery awareness training for all employees via in-house developed eLearning
- Advanced modern slavery training for key supply chain management roles
- Modern slavery educational materials displayed in all offices and site locations.

Risk Assessment and Due Diligence

- Pre-engagement due diligence for suppliers and subcontractors including modern slavery risk screening
- Implementation of contractual clauses requiring providers to comply with modern slavery obligations
- Assessment of procurement categories to identify high-risk materials and services.

Reporting and Grievance Channels

- Whistleblower Hotline and supporting policy allowing safe reporting of suspected unethical practices
- Multiple internal reporting mechanisms for employees and stakeholders.

Assessment of Effectiveness

Our Modern Slavery Committee oversees the monitoring and evaluation of our actions.

Key performance indicators include:



- Employees training completion rates
- Number and nature of modern slavery-related reports received
- Timeliness and effectiveness of investigations and corrective actions

The committee meets at least annually and reports to the Executive Management Team.

Consultation with Group Subsidiaries

All subsidiaries within the group share unified management, governance frameworks, operational systems, and project delivery processes. All subsidiaries participate in the development, implementation, and review of modern slavery-related mechanisms.

Given this integrated structure, no additional consultation beyond standard governance processes was required.

Other Relevant Information

During the reporting period, we continued to strengthen our accounts payable capacity to reduce payment delays, supporting financial stability for suppliers and reducing potential modern slavery vulnerabilities.

Future planned improvements include:

- Enhanced supplier risk mapping
- Supply chain transparency initiatives
- Periodic internal audits on procurement practices
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Process of Consultation with subsidiaries by the Reporting Entity

Total Construction Holdings Pty Ltd ("Total") owns and controls two wholly owned subsidiaries:

- Total Construction Pty Ltd
- Total Special Projects Pty Ltd

All subsidiaries within the group operate under a fully integrated governance structure, which means that consultation occurs continuously and naturally through shared systems, shared personnel, and unified management processes. The following explains that process in full:

Shared Governance and Management Framework

All entities within the Total Construction group share the same Advisory Board, Executive Management Team, and corporate governance framework.

Because decision-making, compliance management, and strategic oversight are centralised, every entity is automatically involved in the development and implementation of modern slavery initiatives.

This ensures:

- Uniform organisational direction
- Consistent risk management practices



- Aligned corporate values and ethical expectations

Common Policies, Procedures, and Management Systems

The parent entity develops and maintains a single set of group-wide systems and policies that apply to all subsidiaries, including:

- Modern Slavery Policy
- Procurement and Supplier Due Diligence Procedures
- People & Culture and Industrial Relations Policies
- ISO45001-certified Work Health & Safety Management System
- Whistleblower Policy and hotline

Because these frameworks are shared, consultation occurs through the collective application, review, and monitoring of these systems.

Integrated Management and Shared Employees

Total Construction's subsidiaries do not operate with separate or independent Employee structures. Teams across People & Culture, Procurement, Project Management, WHS, Finance, and Legal operate group-wide, servicing all entities.

This ensures:

- All employees follow the same training requirements (including modern slavery eLearning)
- Risk information flows freely across all projects and business units
- Controlled entities contribute directly to modern slavery risk assessments

Group Modern Slavery Committee

All entities are represented on Total Construction's Modern Slavery Committee, which meets at least annually.

This committee:

- Reviews modern slavery risks across all entities
- Evaluates the effectiveness of controls
- Recommends improvements
- Oversees group-wide reporting obligations.

Participation from employees across all subsidiaries constitutes an ongoing and meaningful consultation process.

Centralised Data Collection and Information Sharing

During preparation of the Modern Slavery Statement, information from all group entities is consolidated, including:

- Supplier and subcontractor risk insights

- Training completion data
- WHS and People & Culture compliance information
- Reports or concerns raised through the whistleblower channels
- Procurement patterns and country-of-origin risks

This information is shared and discussed through established reporting structures and management systems, ensuring all subsidiaries contribute to the statement's development.

Validation and Review by All Subsidiaries

Before the statement is finalised, relevant managers and committee members across all entities:

- Review the accuracy of the information relating to their operations
- Provide input on risks, incidents, or process improvements
- Confirm that the statement reflects the shared governance environment and risk profile of the group

Final approval by the Executive Management Team formally includes all controlled subsidiaries.

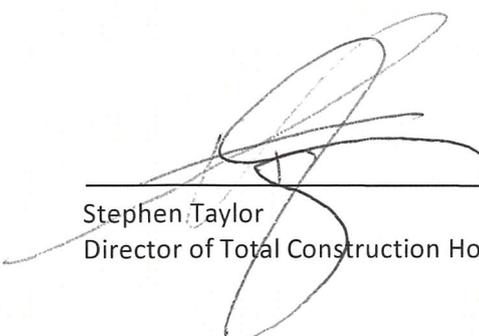
Summary of Compliance with Section 16(1)(f)

Total Construction Holdings Pty Ltd satisfies the consultation requirement of Section 16(1)(f) because:

- All subsidiaries share the same governance, employees, systems, and processes
- Consultation occurs inherently and continuously through these integrated systems
- The Modern Slavery Committee includes representatives from all subsidiaries
- All subsidiaries provide information and review contributions to the annual statement
- Final approval is given by the Executive Management Team that governs the entire group

This ensures that the modern slavery statement accurately reflects the operations, supply chains, risks, and actions of every subsidiary within the Total Construction group.

This statement was approved by the Directors of Total Construction for the reporting entity on the 2 December 2025.



Stephen Taylor
Director of Total Construction Holdings Pty Ltd



William Franks
Director of Total Construction Holdings Pty Ltd