

Modern Slavery Statement – FY2025

6 November 2025

RPT-LG-001-01

Modern Slavery Statement

1. Introduction

This Modern Slavery Statement is made in accordance with the *Modern Slavery Act 2018* (Cth) (“**Act**”) on behalf of Qanstruct (Aust) Pty Ltd (ACN 070 953 874) as trustee for Qanstruct (Aust) Unit Trust (ABN 88 765 907 859) (“**we**”, “**our**”, “**us**” or “**Qanstruct**”).

Qanstruct opposes slavery in all its forms, including human trafficking of persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour and services and the worst form of child labour. This Modern Slavery Statement relates to the financial year ending 30 June 2025.

We aim to protect the human rights of all people and strive to continue to develop our existing practices to ensure we minimise the risk of modern slavery through our supply chain.

2. Qanstruct's structure, operations and supply chain

Qanstruct is a privately owned construction company established in Melbourne in 1986. We are currently undertaking projects in Victoria, New South Wales and Queensland and specialise in the design and construction of industrial and commercial facilities, acting as the ‘Head Contractor’ for our clients across a range of different industries.

Over the past 39 years, we have built a reputation for delivering high-quality and award winning projects with unrivalled integrity and service.

Qanstruct have offices in both Victoria (located at 87 High Street, Kew, 3101) and New South Wales (located at 9 Power Avenue, Alexandria, 2015).

Qanstruct currently directly employs more than 170 people across Victoria and New South Wales. Our team members are engaged by way of an employment contract between themselves and Qanstruct. Some of our site-based team members are covered by our current enterprise bargaining agreements, which include:

- for Victoria, the Qanstruct (Aust) Pty Ltd and the CFMEU (Victorian Construction and General Division) Enterprise Agreement 2024 -2027; and
- for New South Wales, the Qanstruct (Aust) Pty Ltd / CFMEU Collective Agreement 2024-2027.

Our role as Head Contractor requires us to rely on our supply chain in order to successfully deliver our projects. Our supply chain is comprised of subcontractors, consultants and suppliers. Our business is built on long-standing relationships and we are careful in selecting partners that we trust to assist us to deliver our projects.

Our supply chain comprises companies or sole traders registered and operating in Australia. We generally source materials and equipment that are required for the construction process from local Australian distributors.

3. Risks of modern slavery in Qanstruct's operations, supply chains and entities

Risk in operations and supply chains

The integrity of Qanstruct is paramount to our operations and this is reflected in our dealings with our clients, subcontractors, consultants and suppliers. We endeavour to engage

subcontractors, consultants and suppliers that share our values and expectations regarding modern slavery.

The complex nature of the projects that we design and construct means we need to engage with a wide variety of different and highly specialised subcontractors, consultants and suppliers. We recognise that this represents a potential modern slavery risk in our operations. To mitigate against this risk, we make several enquiries during our tendering process to identify the presence of modern slavery in the subcontractors', consultants' and suppliers' operations and supply chain, and to assess the level of risk of modern slavery in their operations.

Qanstruct has established an audit tool, the Due Diligence Self-Assessment Questionnaire, which subcontractors, consultants and suppliers must respond to as part of our pre-selection process for their potential engagement.

Other Qanstruct entities

The nature of Qanstruct's corporate structure (being a trustee of a Unit Trust) means that it does not own or control any other entities.

4. Actions taken by Qanstruct to control / address modern slavery risks

Subcontractors, consultants and suppliers

Qanstruct's Due Diligence Self-Assessment Questionnaire is a self-assessment which must be completed by each of our potential subcontractors, consultants and suppliers as part of the pre-qualification process. The responses provided are then assessed by us to identify those subcontractors, consultants or suppliers who represent a high risk of modern slavery.

If a subcontractor, consultant or supplier is identified as high risk based on the responses provided, we would undertake further enquiries directly with that particular entity. Any subcontractors, consultants and suppliers that are unable to satisfy us that they are properly managing the risk of modern slavery in our supply chain will not be engaged by us.

Qanstruct's Project Managers and Contracts Administrators are responsible for:

- (a) ensuring the relevant subcontractor, consultant or supplier is provided the Due Diligence Self-Assessment Questionnaire;
- (b) considering the responses to that document;
- (c) making further enquiries with high-risk subcontractors, consultants and suppliers; and
- (d) ensuring those subcontractors, consultants or suppliers who cannot satisfy our requirements are not engaged by us.

Qanstruct trains its Project Managers and Contracts Administrators to:

- (a) the use and purpose of this document; and
- (b) what types of information disclosed may present a significant modern slavery risk.

We have identified that engagement with our subcontractors, suppliers and consultants in the first instance is the most effective way to identify and action instances of modern slavery in our supply chain. This is addressed by:

- issuing the Due Diligence Self-Assessment Questionnaire to subcontractors, consultants and suppliers as part of the pre-qualification process and prior to the award and execution of Subcontracts and Consultant Agreements;
- reviewing and assessing the responses provided in the Due Diligence Self-Assessment Questionnaire as part of our procurement process;
- including Qanstruct's Modern Slavery Policy as part of the induction process for new team members;

- reviewing and updating Qanstruct's Modern Slavery Policy and other policies on an ongoing basis;
- including contractual obligations in our Subcontract template and Consultant Agreement template that require our subcontractors, consultants and suppliers to confirm that they comply with the Act.

Our operations

We have not identified any modern slavery risks in relation to our directly engaged workforce.

We aim to provide a safe and compliant working environment for all of our team members. Through our inclusive culture, we offer an environment where all team members can thrive regardless of their gender, race, religion, cultural background and sexual orientation.

Qanstruct has the following controls in place to safeguard this environment, including:

- Modern Slavery Policy
- Whistleblower Policy
- Confidentiality & Privacy Policy
- Equal Employment Opportunity, Anti-Discrimination & Anti-Bullying Policy
- Right to Disconnect Policy
- Health and safety compliant to AS/NZS 4801
- Office of the Federal Safety Commissioner Accreditation

5. Assessing Effectiveness

In the last financial year, Qanstruct has undertaken the following activities:

- reviewed its current modern slavery risks and compliance measures;
- reviewed and updated our Modern Slavery Policy;
- reviewed our Due Diligence Self-Assessment Questionnaire;
- reviewed and updated the modern slavery contractual provisions included in our Subcontract template and Consultant Agreement template; and
- incorporated our Modern Slavery Policy into the onboarding process for new team members.

The completion of these activities has expanded our understanding of our modern slavery obligations and risk factors and allowed us to put in place a system to better identify and manage risks of modern slavery in our supply chain.

Given this focus, the manner in which we assess the effectiveness of our strategies is in its early stages. However, Qanstruct is committed to developing a more robust system to assess the effectiveness of these actions, which we also recognise is an ongoing process.

Qanstruct has identified that the effectiveness of its measures may be assessed by:

1. Tracking the number of subcontractors, consultants and suppliers that:
 - (a) are engaged by us where our risk mitigation measures have not identified any material modern slavery risks;
 - (b) are engaged by us after we have made further enquiries based on the responses received in our Due Diligence Self-Assessment Questionnaire; and
 - (c) are not engaged by us based on the responses received in our Due Diligence Self-Assessment Questionnaire or a failure to satisfy our concerns after making further enquiries.
2. Reviewing and tracking the number of subcontractors, consultants and suppliers that are:
 - (a) asked to implement control measures for modern slavery by Qanstruct;
 - (b) not engaged by Qanstruct for failure to implement those measures; and/or
 - (c) subject to control measures for modern slavery by Qanstruct.

3. Testing team members on their understanding of modern slavery and modern slavery risks by requiring more frequent compliance training and testing.

As part of our ongoing monitoring of modern slavery risks, Qanstruct is committed to determining further ways it can assess the effectiveness of its current measures, including by implementing the above measures.

6. Consultation with other entities

Qanstruct does not own or control any other entities and therefore no consultation with any other entity was required in preparation of this Modern Slavery Statement.

7. Continual Development

Qanstruct opposes modern slavery in all forms and is committed to improving its practices in its fight against modern slavery. Over the next financial year, Qanstruct will continue to engage with its supply chain to understand the extent of any risk and address any issue, of modern slavery.

Further to the above, Qanstruct aims to:

- establish an annualised review schedule for our Modern Slavery Policy, Due Diligence Self-Assessment Questionnaire and the preparation of our Modern Slavery Statement;
- implement mandatory training for all team members to facilitate an understanding of what modern slavery is, how it can be identified and the mechanisms for reporting it; and
- continue to engage with subcontractors, consultants and suppliers in relation to modern slavery by way of the Due Diligence Self-Assessment Questionnaire.

Qanstruct endeavours to monitor its performance against these continual development objectives and intends to undertake a review of its progress in 2026.

8. Approval

Qanstruct is pleased to publish its Modern Slavery Statement for 2025.

This Modern Slavery Statement was reviewed and approved by Qanstruct's Board on 6 November 2025.



Name: Joshua Horan

Position: Director

**For and on behalf of the Board of Directors of Qanstruct
(Aust) Pty Ltd**

Version

Document ID	RPT-LG-001-01	Document Title	Modern Slavery Statement – FY2025
Approved	6 November 2025	Review	June 2026