



GHELLA

1894

MODERN SLAVERY COMPLIANCE STATEMENT

Reporting period: January 2024 to December 2024



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01 LETTER TO STAKEHOLDERS

As we reflect on another year of growth and expansion, we are reminded of our enduring commitment to Ghella's values and our role in creating lasting, positive change. Creating a better world for future generations is central to everything we do. 2024 marked another milestone for our company, as we solidified our position as a key player in the Australian infrastructure sector.

We started works in Victoria for our Suburban Rail Loop East Tunnelling Contract, continued to reinforce our ties with our New Zealand operations, and acquired a majority stake in the Rix Group of Companies. This expansion strengthens our reach and project capabilities in Australia and beyond, paving the way for exiting developments.

As a global leader in construction, we are acutely aware of the responsibilities that come with our reach and influence. Ensuring ethical and responsible business practices are not just a requirement but a core element of who we are. In line with our commitment to environmental, social, and governance objectives, we continue to drive efforts that not only fulfill our obligations but also reflect the values of integrity, transparency, and fairness.

At Ghella, we take an unequivocal stance against modern slavery in all its forms. We believe that every person deserves to work under conditions of fairness, dignity, and respect, and we stand firm in our commitment to eliminating modern slavery risks within our supply chains. We extend this commitment to our partners, ensuring that those we collaborate with share our values and contribute to a workforce that upholds the highest standards of human rights.

Over the past year, we have continued to strengthen our approach to risk mitigation, focusing on transparency and accountability. In 2024, we monitored our key policies, including our whistleblower and grievance handling procedures, to ensure that all stakeholders have access to clear, accessible channels for reporting any concerns. These updates reflect our ongoing dedication to maintaining a safe, ethical, and accountable environment across all levels of our operations.

Our commitment to combating modern slavery is an ongoing journey. We will continue to invest in the tools, training, and partnerships needed to strengthen our policies and enhance the effectiveness of our actions. Together with our stakeholders, we will work towards an industry that upholds the principles of freedom, dignity, and respect for all people.

As we look toward the future, we remain committed to creating value for all stakeholders and ensuring that Ghella remains a trusted, ethical leader in the infrastructure sector, now and in the years to come.



A handwritten signature in blue ink, appearing to read 'Marco Fontana Gribodo'.

Marco Fontana Gribodo
Managing Director
Ghella Pty Ltd

02 GHELLA AUSTRALIA

Ghella forms part of the global Ghella S.p.A. group, a company with over a century of experience in delivering complex infrastructure across the world. Ghella is involved in the construction of many infrastructure projects such as metros, railways, motorways and roads, significant water and hydraulic works and renewables assets and related infrastructure. Our Australian operations are comprised of the following main entities - Ghella Pty Ltd, GI&P Pty Ltd, The Rix Group Pty Ltd, Rix Asset Maintenance Pty Ltd, and Rix Ground Engineering Pty Ltd - working together to deliver major projects that shape communities and advance national infrastructure.

Founded in 1894, Ghella internationally has developed a global reputation as “constructors of excellence”, known for technical innovation, engineering precision, and unwavering integrity. These values guide every aspect of our operations including how we build, engage with partners, and meet our environmental and social responsibilities.

Since 2010, Ghella has delivered some of the most iconic and technically challenging infrastructure projects in Australia. The integration of the Rix Group of companies into our local operations has strengthened our geotechnical and specialist capabilities, allowing us to offer end to end delivery solutions and further embedding us in the Australian and New Zealand markets.

With the use of cutting-edge technologies, the continuous training of our workforce, the development of innovative construction methods, as well as our focus on safety and the environment, Ghella can complete complex engineering works, ensuring the company's ongoing dynamic growth, as well as supporting the economic and social development of local communities.

Sustainability remains at the heart of our business strategy. We believe that long-term success is inseparable from environmental stewardship and social progress. Across all

aspects of our operations, we aim to generate positive outcomes by delivering lasting infrastructure, fostering inclusive workforce development, and supporting the prosperity of the communities in which we work.

The supply chain is an essential part of our value creation model. Whether through procurement of goods and services, engagement of specialist subcontractors, or the deployment of our team, our supply chain is central to our ability to deliver infrastructure safely, efficiently, and responsibly. With the addition of the Rix Group of companies, our operational footprint has deepened, and so too has the complexity of our supply chain and the need for robust oversight.

We recognise that the construction sector carries heightened exposure to modern slavery risks, particularly in relation to labour recruitment practices and the sourcing of materials from jurisdictions where exploitation may be more prevalent. For that reason, we are unequivocal in our position that all forms of modern slavery are unacceptable. We are committed to ensuring that all work performed across our operations and supply chain is freely chosen and conducted in safe and fair conditions, free from coercion, deception, or exploitation.

Our commitment to eradicating modern slavery is reflected in how we engage with our suppliers, how we structure our contracts, how we implement our policies, and how we continuously monitor and improve our practices. This approach extends across all our entities and reflects our broader responsibility as leaders in infrastructure delivery.

As we continue to grow and deliver transformational infrastructure across the region, we remain committed to building with integrity, acting with purpose, and maintaining the high standards that underpin our reputation as constructors of excellence.



REPORTING ENTITIES

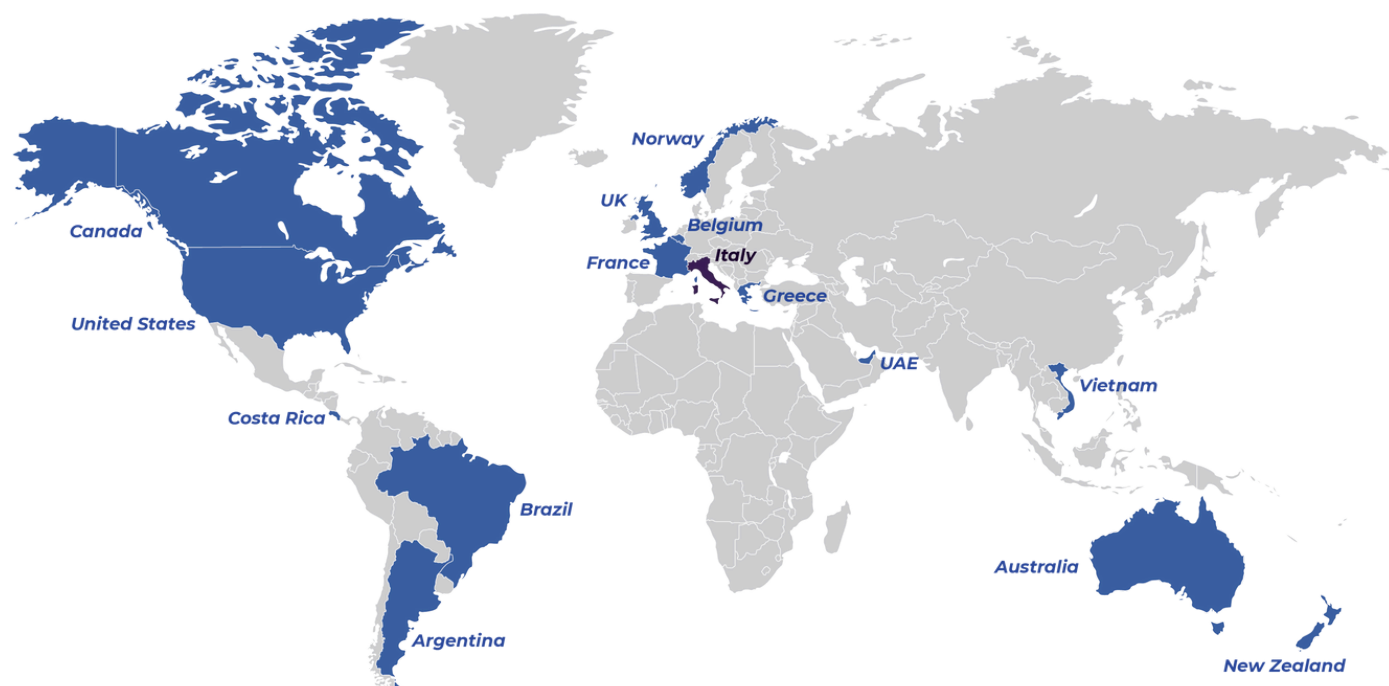
Ghella Pty Ltd (ACN 142 392 461), GI&P Pty Ltd (ACN 602 726 509), The Rix Group Pty Ltd (ACN 092 239 113), Rix Ground Engineering Pty Ltd (ACN 631 690 858) and Rix Asset Maintenance Pty Ltd (ACN 605 841 021) are the primary corporate entities operating in Australia and are the reporting entities for the purposes of this Modern Slavery Statement.

Ghella Pty Ltd is a wholly owned subsidiary of Ghella S.p.A., as is GI&P Pty Ltd, which is wholly owned by Ghella S.p.A. through one intermediary, Ghella Investments & Partnerships S.p.A. Ghella Pty Ltd own a majority stake in The Rix Group Pty Ltd, Rix Ground Engineering Pty Ltd and Rix Asset Maintenance Pty Ltd through a holding company.

Ghella S.p.A is headquartered in Rome, Italy and carries out its activities in Italy and abroad in Australia and New Zealand, Asia, the Americas, and Europe, with subsidiary entities operating in the various jurisdictions. The subsidiary entities generally operate with oversight and coordination from the parent corporate group in Italy.

In the 2024 financial year, Ghella had a consolidated revenue that renders it a reporting entity under the Modern Slavery Act 2018 (Cth) (the “Modern Slavery Act”).

This statement was approved by the Boards of Directors of Ghella Pty Ltd and GI&P Pty Ltd in June 2024.



GHELLA PTY LTD
ABN 85 142 392 461

Ghella Pty Ltd is an Australian contractor in the large public works construction market, focused on metros, railways, motorways and renewables assets and infrastructure.

THE RIX GROUP PTY LTD

The Rix Group delivers expert ground engineering solutions, combining innovation, precision, and industry-leading expertise. With a focus on complex infrastructure and geotechnical projects, Rix provide tailored solutions backed by cutting-edge technology and a highly skilled workforce

**RIX GROUND
ENGINEERING PTY LTD**

RIX Ground Engineering services major infrastructure and building projects throughout Australia. They deliver the highest quality work using jet grouting, in-situ soil mixing, restricted access piling and micropiles and rigid inclusions.

GI&P PTY LTD
ABN 14 602 726 509

GI&P Pty Ltd sponsors and invests in major concessions in Australia, such as public-private partnerships, aiming to provide sustainable financial returns for the Ghella group.

**RIX ASSET
MAINTENANCE PTY LTD**

RIX Asset Maintenance provides specialised rope access services for infrastructure, demolition, and maintenance projects across Australia. They combine experience and innovation to deliver high-quality, efficient results for every project



03 GHELLA STRUCTURE, OPERATIONS & SUPPLY CHAIN

As at 31 December 2024, our Australian group had a combined workforce of over 500 employees. Ghella predominantly conducts business as a minority stakeholder in joint ventures and consortia with other (unrelated) entities for various projects with the majority of its workforce engaged to support these initiatives.

Over 95% of Ghella's work relationships and supply chains operate through these minority interests in unincorporated joint ventures. Ghella contributes resources as well as delegates authority to the relevant joint venture teams. The Rix Group of Companies predominately self-perform their services which provides the benefits of more control in its resources.

Ghella's key areas of procurement relate to materials (such as concrete, steel, and other construction materials), major plant and equipment (such as tunnel boring machines), specialised construction components, specialised subcontractors (such as electricians, plumbers and other tradespeople and specialised construction workers), insurances, professional services, and other utility services.

The vast majority of Ghella's procurement is local, with less than 10% of procurement from outside of Australia (for example the manufacturing of tunnel boring machines in Germany or China and other very specialised pieces of equipment).

04 MODERN SLAVERY RISKS

Ghella again welcomes the opportunity to submit this Modern Slavery Statement in accordance with the Modern Slavery Act 2018 (Cth), reflecting our continued commitment to ethical business practices and human rights across our operations and supply chains.

Throughout FY24, Ghella undertook a detailed review of its operations, supply chain arrangements and risk environment to assess actual and potential exposure to modern slavery. While we consider our overall risk profile to be low to moderate, we remain vigilant in recognising and addressing any factors that may increase vulnerability to modern slavery.

The majority of Ghella's direct operations are undertaken within Australia and New Zealand, jurisdictions with robust legal frameworks, relatively low prevalence rates of modern slavery, and strong enforcement of workplace rights. Our permanent workforce is engaged directly, supported by comprehensive HR practices, training, and grievance mechanisms. However, we acknowledge that certain structural and sectoral characteristics may elevate exposure to modern slavery risks, particularly in our extended supply chains.

Key risk areas we continue to monitor include:

- **Joint Venture and Consortium Structures:** Many of our large-scale infrastructure projects are delivered through joint ventures or consortiums. These arrangements can reduce direct oversight and may limit the ability to fully enforce uniform practices across all parties.
- **Sector-Specific Risks:** The infrastructure and construction sector inherently present modern slavery risks due to the reliance on complex supply chains, procurement of materials from offshore jurisdictions, and the use of subcontracted or labour hire workforces, particularly in lower-skilled roles.

- **Geographic Risk in Supply Chains:** While our primary operations are in Australia and New Zealand, we source a number of construction materials, plant, and equipment from countries in Asia and other regions that may have moderate to high prevalence of forced labour, weak enforcement of labour laws, and systemic vulnerabilities in supply chain governance.
- **Workforce Vulnerability:** The broader construction ecosystem frequently engages migrant workers, temporary labour, and subcontractors who may be at greater risk of exploitation due to limited access to rights awareness, visa dependency, language barriers, or financial insecurity.

These risk indicators are not unique to Ghella, but rather reflect broader patterns within the global construction and infrastructure sectors. Nevertheless, we take our responsibility seriously. In response, we continue to enhance our due diligence processes, build supplier awareness, and strengthen contractual and operational controls to mitigate these risks.

Our approach remains dynamic. As our operations grow, particularly following the integration of the Rix Group of companies and the award of new major infrastructure projects, we recognise that our risk landscape evolves. We remain committed to deepening our understanding of modern slavery vulnerabilities and responding with effective, transparent, and accountable systems.



05 ACTIONS TAKEN TO ASSESS & ADDRESS MODERN SLAVERY RISKS

Ghella is committed to delivering sustainable outcomes through the infrastructure it contributes to creating, not just through our direct operations but also in the supply of materials, works, and services provided by third parties. We are focused on taking proactive steps to address exploitation risks, particularly those associated with modern slavery, across our supply chain.

During the relevant reporting period of the 2024 financial year, Ghella had (and continues on an ongoing basis to refine and develop) a range of mechanisms to appropriately assess and address the potential risk of modern slavery practices within its supply chains under

the following broad categories (as detailed further below):

- (A) Governance and leadership
- (B) Policies and procedures
- (C) Procurement systems
- (D) Audit and assurance
- (E) Contractual arrangements
- (F) People

This ongoing commitment to responsible practices and continuous improvement reflects our determination to drive real change and ensure that modern slavery is not tolerated within our operations, suppliers, or the wider industry.



05 a) GOVERNANCE & LEADERSHIP

Since the inception of Ghella S.p.A 130 years ago, we have lived through five generations of recent history, passing down knowledge, expertise, ingenuity, and spirit of enquiry, with each generation resolving difficult challenges and leaving its mark on today's company.

Ghella S.p.A. is an unlisted Italian company limited by shares, which wholly owns the Australian Ghella entities, Ghella Pty Ltd and GI&P Pty Ltd. Ghella's Australian entities are the Majority shareholder in the Rix Group of companies.

In April 2024, Ghella established the Control, Risks and Sustainability ("CRS") Committee, which replaced the former Environmental, Social and Governance (ESG) Committee. The CRS Committee reports directly to the Board of Directors of Ghella S.p.A. and retains the key responsibilities of its predecessor, with an enhanced focus on internal controls and risk management. Its role includes identifying strategic priorities, commitments, and objectives, as well as assigning responsibilities aligned with the company's operational and business needs.

The committee comprises four members, three of whom also serve on the Board of Directors, each bringing relevant expertise and representation. The committee is chaired by Ghella S.p.A.'s Vice President, Federico Ghella. It is supported in its functions by Ghella's risk, compliance, and sustainability team. In 2024, the CRS Committee launched a new Enterprise Risk Management (ERM) process aimed at systematically monitoring and improving Ghella's risk performance and oversight.

Ghella has a dedicated sustainability manager to support the Australian business, while coordinating with the risk, compliance, and sustainability functions in Italy.





Ghella's Australian subsidiaries have independent boards of directors, with senior management also working closely with the Ghella S.p.A. board of directors and senior management teams.

Our Code of Ethics defines the values, commitments, and ethical and social responsibilities that all those who work in the name and on behalf of Ghella are required to assume when carrying out business activities. It expresses the ethical and conduct principles that represent us and that all those who work to achieve the company's objectives are required to comply with.

Ghella's Code of Ethics embodies our business model hinging on shared values, which underpin our sustainability plan, and the most recent legislation. Ghella's Code of Ethics can be found on our website at Ghella.com.

The Code of Ethics acts as a guideline, regulation, and general standard of behaviour with which the recipients of the code are required to comply to avoid the risk of unethical behaviour.

The code is adopted by all group companies and all shareholders, directors, auditors, and employees at all levels without exceptions,

consultants, suppliers, and all those who, directly or indirectly, permanently, or temporarily, establish relations or dealings with Ghella, operating in pursuit of its goals.

Specifically, Ghella undertakes to refrain from promoting any form of patronage and nepotism, as well as not to establish any labour connection with parties involved in crimes of terrorism, corruption, bribery and/or exploitative practices.

More broadly, the ethical principles in the code addresses the following key areas:

- honesty and impartiality and respect of the rules;
- not permitting any form of forced labour;
- prevention of corruption;
- repudiation of terrorism;
- protection of individual personality;
- integrity, responsibility, value of human resources and corporate interest;
- conflict of interest;
- corporate governance;
- capital, creditors, and market;
- entrepreneurship; and
- sharing reference ethical principles.

05 b) POLICIES & PROCEDURES

Ghella outlines its overarching values and expectations for the provision of services in connection with its organisation through a range of policies and key documents.

These policies and guidelines provide workers, suppliers, and vendors of Ghella with a general framework on topics including:

- Sustainable procurement;
- Modern slavery;
- Human rights;
- Whistleblowing;
- Equality, diversity and inclusion;
- Appropriate workplace behaviour and grievance handling;
- Anti-corruption; and
- Health and safety.

This is intended to assist in ensuring that all work performed in joint ventures and in the supply chain for Ghella is completed to the highest ethical standards and with a

commitment to fair and responsible trading practices. In this regard, these documents and policies demonstrate the general risk management framework and strategies adopted by Ghella to manage legal and ethical issues.

Copies of key policies and procedures are communicated to Ghella's employees as part of the mandatory induction process and available on Ghella's intranet, as well as many being available to all stakeholders via the company's external facing website. The policies are reviewed annually during management system reviews to ensure they are consistent with Ghella's mission and vision as well then current legislative requirements. Relevant procedures are shared internally via the Ghella's intranet.



Sustainable Procurement Policy



Ghella's Sustainable Procurement Policy is in place to qualify and where appropriate, monitor its suppliers and subcontractors against Ghella's Sustainable Procurement Principles.

Relevantly, the Sustainable Procurement Principles include:

- Ethical sourcing – source products, materials and services ethically using recognised credible standards, including procuring fair trade goods where available and request that Ghella's ethics and anticorruption principles are adopted by its supply chain;
- Labour standards – implement a proactive approach to tackling hidden labour exploitation in Ghella's supply chain, including subcontractors working on its sites
- Supplier diversity – work with suppliers that actively manage diversity and inclusion in their workforce; and
- Supply chain engagement – adopt a collaborative approach in relationships with suppliers and subcontractors to make them part of Ghella's sustainable journey.

Modern Slavery Policy

Ghella's Modern Slavery Policy was adopted in 2019 and updated in 2024. It demonstrates Ghella's commitment to ensuring compliance with the Modern Slavery Act and emphasises that modern slavery practices will not be tolerated by Ghella. The Modern Slavery Policy highlights Ghella's proactive approach to labour management practices to monitor and manage modern slavery risks on its sites and in its materials and labour supply chains. In this regard, it expressly notes Ghella will:

- designate appropriate managers to have responsibility for developing and operating company procedures relevant to this issue;
- apply the employer pays principle (i.e., job finding fees are a business cost never to be paid by job applicants);
- provide information on modern slavery to its workforce through induction materials, training and other relevant awareness raising communications;
- ensure that all staff responsible for directly recruiting workers or managing labour providers are trained to be aware of issues around third-party labour exploitation and signs to look for to detect it;
- adopt a proactive approach to reporting suspicions of labour exploitation to the relevant authorities;
- encourage and support employees and agency workers to report internally cases of hidden third-party labour exploitation, provide the means to do so and investigate and act on reports appropriately, through its whistleblowing policy;
- require labour providers and other organisations in its supply chain to adopt policies and procedures consistent with the above; and
- require its business partners to demonstrate alignment to Ghella's commitment to tackle modern slavery.

Human Rights Guidelines

Dignity and respect for people are at the core of Ghella's corporate culture and Ghella's Human Rights Guidelines express Ghella's commitment to respect fundamental human rights.

The Guidelines are accessible to the public on Ghella's website.

The Guidelines are:

- addressed to the workforce of Ghella and all its direct and indirect subsidiaries;
- aimed at external stakeholders to inform them about the principles followed by Ghella to respect human rights practices in its operations; and
- communicated internally and externally to all employees, business partners and other relevant parties.

In particular, Ghella's guidelines:

- forbid any type of forced labour, prison labour, bonded labour, or any other modern form of slavery and human trafficking, extending such provisions to its business partners;

- precludes the hiring of any children under the minimum age established by the International Labour Organization Convention no. 138 and does not allow the hiring of children under the local age for employment or mandatory school leaving;
- prohibits child labour, not tolerating any work where, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or morals of children;
- specifies that the minimum compensation for Ghella's employees cannot be set lower than the minimum threshold defined by collective labour contracts and the regulations in place in each country of operation;
- reiterates that Ghella respects its workers' right to rest and leisure and ensures this is attained while being compliant to applicable laws and aligned to the market;
- notes that Ghella provides its workforce with specialised training, endorsing, and disseminating a safety culture within its business;
- highlights that Ghella does not tolerate threats, bullying or intimidation, and severely condemns those who threaten the dignity of others and their right to work in a friendly and fair environment; and
- promotes a zero-tolerance culture for corruption or inappropriate behaviours.

Whistleblowing Policy

Ghella S.p.A Whistleblowing Policy was supplemented with a Ghella specific policy in 2023, since then we have been monitoring its effectiveness and are proud. Ghella's Whistleblowing Policy refers to channels through which a report can be made (including a dedicated web portal) and contact details of the local Compliance Managers for Australia and alternative means of escalation.

The Whistleblowing Policy details:

- what to report;

- how to make a report (with options and escalation mechanisms);
- the handling and analysis of reports; and
- protection mechanisms for individuals who make a whistleblower complaint.

Ghella's whistleblowing web portal was established to provide additional means of encouraging and guiding the reporting of any inappropriate / unlawful conduct. This is accessible to all workers (including employees and contractors) as well as members of the public via [Ghella.com/whistleblowing](https://ghella.com/whistleblowing).

Equality Diversity and Inclusion Policy

The Equality Diversity and Inclusion Policy highlights Ghella's commitment to an inclusive culture. In particular, Ghella strives for inclusivity in both its workforce and supply chain. In this regard, where possible Ghella aims to invest in local employment and to increase the use of local suppliers in its workforce and supply chain, reflective of the countries where Ghella operates.

Ghella requires that its business partners, suppliers, and subcontractors align with the equality, diversity and inclusion principles expressed in the policy by subscribing to Ghella's Code of Ethics and related policies in the qualification and contractual phases.

Appropriate Workplace Behaviour Policy

Ghella's Appropriate Workplace Behaviour Policy is reflective of the objective to maintain a safe and productive work environment where the dignity of every person is respected.

Inappropriate behaviours in the workplace are stated as unacceptable and not condoned by Ghella. Inappropriate behaviour includes

discrimination, social isolation, harassment, bullying, victimisation, intimidation, and manipulation.

Ghella provides access to multiple options of confidential reporting channels that may be used for cases of inappropriate behaviour in the workplace as well as appropriate escalation procedures in its Grievance Handling Policy.

Anti-corruption Guidelines

The Anti-corruption Guidelines state Ghella's zero tolerance for corruption with a commitment to condemn and prevent any form of corruption and bribery, in accordance with Ghella's Code of Ethics and with the anti-corruption procedures that Ghella has implemented locally.

The Anti-corruption Guidelines are applied in conjunction with legal requirements and regulations locally in force.

The Anti-corruption Guidelines apply to:

- the workforce of Ghella and all of its direct and indirect subsidiaries, whether they be executives or employees;
- external stakeholders to inform them about the principles followed by Ghella to fight corruption and bribery practices in its operations; and
- direct and indirect subsidiaries in all geographical locations.

Health and Safety Policy

The Health and Safety Policy is evidence of Ghella's commitment to complying with relevant work, health and safety legislation and maintaining a safe work environment for its workers, contractors, sub-contractors, visitors, and others that may be impacted as a result of its business activities.

Ghella is dedicated to eliminating risks, or where this is not practicable, minimising risks, to reduce the likelihood of injury and illness within the workplace.

05 c) PROCUREMENT SYSTEMS

Ghella has robust procedures in place for the qualification and monitoring of suppliers, whose services may influence Ghella's performance and the quality and sustainability of the projects to be carried out which includes a pre-qualification procedure, a supplier declaration form, supplier assessment reporting and supplier monitoring. Such processes include assessments on the following in relation to the supplier's:

- competence of personnel;
- ability to work in quality regime;
- attention to environmental aspects;
- attention to occupational, health and safety;
- attention to environmental, social, and economic sustainability; and
- adequacy of administrative requirements

These systems apply to all the activities of Ghella and its subsidiaries and joint ventures in cases where our management system has been adopted.

Where Ghella is working in joint venture with

other organisations for the delivery of projects and Ghella's management system has not been adopted, the management system will be designed specifically to consider each partner's management system and we participate in the design of the shared system to ensure that our principles are integrated in the joint venture's systems.

For our projects in Australia in which we hold minority joint venture interests, this means adoption of similar pre-qualification procedures, supplier declaration forms, supplier assessment reporting and supplier monitoring that have been adopted by the majority joint venture interest parties. We ensure adequacy and compliance of such procedures through the initial establishment of the systems for specific projects, contractual arrangements with the joint venture parties and ongoing joint venture audits (as described below) and annual review of the majority joint venture interest party pre-qualification procedures to ensure robustness of process with respect to modern slavery risk management.



05 d) AUDIT AND ASSURANCE

For the joint ventures in which we operate in Australia, the worksite's management system is designed to consider each partner's management system and we participate in audits undertaken periodically by the joint venture company organisations during the construction phase.

Audits are undertaken in accordance with a schedule with a specific audit work program

dedicated to the procurement management plans.

In addition to the audits undertaken periodically by the joint venture company organisations, there is an overlay of our government clients, which have contractual rights that enable them to undertake audits of our projects.

05 e) CONTRACTUAL ARRANGEMENTS

Ghella ensures that its joint ventures are aligned with Ghella in relation to performance in adequately mitigating modern slavery risks, including by requiring joint venture parties to agree to specific provisions in our joint venture agreements to take all necessary reasonable steps to comply with the Modern Slavery Act and comply with any reasonable requests to provide any assistance, information or documents as required to manage modern slavery risks and discharge any obligations arising under the Modern Slavery Act.

Ghella also ensures that any agreements entered into for joint ventures incorporate a clause that refers to Ghella's Code of Ethics which sets out how Ghella and its business partners should behave in doing business.

This clause ensures any organisation doing business with Ghella agrees:

- they have or will, obtain a copy of the Code of Ethics from Ghella for their information; and
- they will conduct their business in a proper manner, including full compliance with accepted business practices, applicable codes of conduct and generally accepted business ethics (including those acceptable business ethics and applicable standards of conduct outlined in the Code of Ethics).

In addition, there are certain contractual rights afforded to Ghella to enforce sanctions and/or the cessation of the arrangement in the event of non-compliance.

05 f) PEOPLE

Ghella is committed to providing the best opportunities for individual development and to protecting the rights and needs of its employees. Training is a fundamental tool for us to achieve those ambitions. Training is carried out in different forms such as training on the job, internships, e-learning as well as internal and external dedicated training courses, depending on individual needs and the broader needs and objectives of the organisation.

Training on Ghella's key policies and procedures is mandatory for all new employees. New employees are introduced to Ghella's Code of Ethics which specifically includes guidance that we do not permit any form of forced labour and are provided training on bribery and anti-corruption, appropriate workplace behaviour and equality and diversity in the workplace.

06 ASSESSMENT OF THE EFFECTIVENESS OF ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS

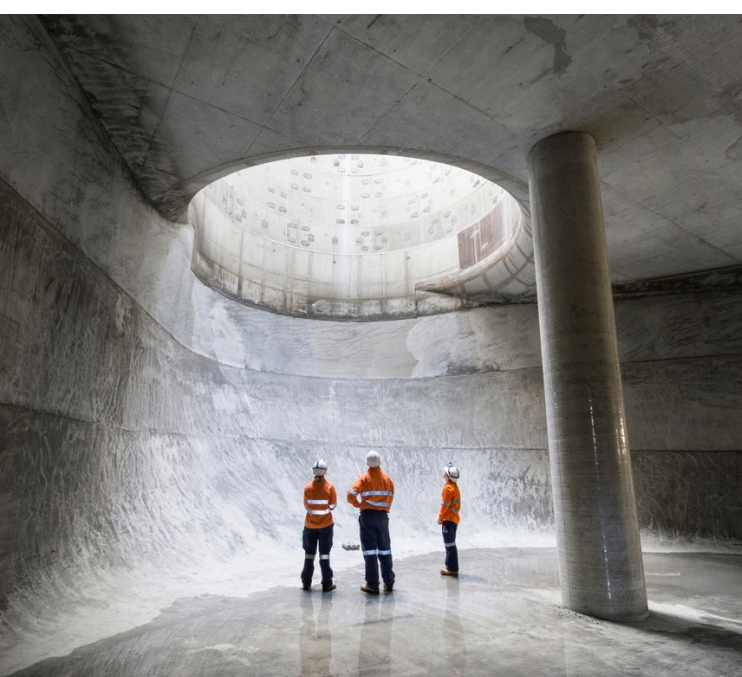
Ghella utilises a broad range of policies and procedures to proactively mitigate the risk of modern slavery in its operations, work relationships and supply chains. Ghella ensures copies of relevant policies and procedures are communicated to its employees as part of the mandatory induction process and available on Ghella's intranet, as well as most being available to all stakeholders via the company's external facing website. In addition, business partners, suppliers and subcontractors are required to align with and adhere to the relevant principles.

Of particular note, Ghella has adopted a specific Modern Slavery Policy and encourages and supports employees and agency workers to report internally cases of hidden third-party labour exploitation. In 2024 we monitored the update of relevant policies, including our Whistleblowing Policy and Grievance Handling Policy to refine that and other policies. As summarised above, the updated Whistleblowing Policy and Grievance Handling Policy ensures stakeholders have more options for reporting complaints and a clearer process for having the complaints properly considered.

In this way, Ghella can stay informed of its management of modern slavery policies, by empowering employees at any level to report specific challenges.

Other mechanisms monitored and implemented by Ghella to ensure the effectiveness of the actions taken include:

- robust procurement processes to verify alignment to values and requirements;
- regular engagement with business partners and stakeholders to discuss any identified issues or concerns;
- defined auditing and assurance activities on various matters including sustainability, procurement, safety, environment, and workforce management;
- assessed and invested into our in-house commercial and legal team;
- the provision of information on modern slavery to its workforce through induction materials, training and other relevant awareness raising activities;
- ensuring that all staff responsible for directly recruiting workers or managing labour providers are trained to be aware of issues around third-party labour exploitation;
- adopting a proactive approach to reporting suspicions of labour exploitation to stakeholders (and if appropriate, relevant authorities);
- encouraging and seeking to utilise ethically sourced products, materials, and services by considering available credible and reported standards regarding the practices of third-party providers (where possible); and
- adopting a collaborative approach in relationships with business partners and suppliers to help in identifying and addressing potential issues.



07 PROCESS OF CONSULTATION

This statement has been prepared in consultation with the relevant entities that comprise Ghella's Australian operations. As reporting entities under the Modern Slavery Act 2018 (Cth), Ghella Pty Ltd, GI&P Pty Ltd, The Rix Group Pty Ltd, Rix Asset Maintenance Pty Ltd, and Rix Ground Engineering Pty Ltd coordinated to assess risks, develop response measures, and align due diligence processes across the corporate group.

Ghella maintains a robust and adaptive consultation process designed to facilitate meaningful internal engagement on modern slavery risks. Key internal stakeholders, including employees, management, and board members, are regularly engaged to provide insights into operational activities that may present exposure to modern slavery.

Confidential feedback mechanisms, including those outlined in our Whistleblower Policy, are available to ensure that individuals can raise concerns or provide information without fear of reprisal. All reported matters are taken seriously and subject to internal review in accordance with our established protocols, with appropriate remedial action taken where necessary.

Whilst no concerns were reported during the relevant period, we remain vigilant and proactive. To support awareness and early identification of risks, we deliver regular training to internal stakeholders, reinforcing our zero-tolerance approach to modern slavery. This consultation process is subject to ongoing review to ensure it remains effective and responsive to evolving risks.

In addition to internal consultation, insights were drawn from industry networks and guidance materials published by the Australian Government, as well as lessons learned from previous reporting periods. This collaborative and multi-entity approach supports continuous improvement and ensures that Ghella's modern slavery framework is responsive, transparent, and consistent with best practice.

This Statement was discussed and approved by the Boards of Directors of Ghella Pty Ltd, GI&P Pty Ltd and The Rix Group Pty Ltd following review of the consultation process and the contents of this Statement.



08 OUR COMMITMENT

Noting that Ghella currently primarily operates through partnerships and joint ventures in Australia, and the Rix Group of companies operate as principal contractor, the implementation of various initiatives with respect to addressing risk mitigation involves the engagement and cooperation of other external stakeholders. Where we operate as part of a joint venture, the worksite's management system is designed to consider each partner's management system and Ghella participates in the design of the shared system to ensure that our principles are integrated in the joint venture's system.

Over the next year, we will continue to develop and implement business practices and manage modern slavery risks, based on best practice guidance suited to the specific risks of our business.

Such initiatives will include:

- Continuous development of our corporate understanding of modern slavery risks and best practices for risk management;
- Better integrate best practice with respect to modern slavery across our expanding business;
- Continuing to review business practices to ensure that issues around modern slavery is adequately addressed and updated to account for changes in best practice approaches and procedures to manage modern slavery risks are consistently implemented.

Again, we appreciate the opportunity to prepare and submit this statement in accordance with the Modern Slavery Act 2018 (Cth).



