



# Modern Slavery Statement

FINANCIAL YEAR 2024/25

Proud to be one of Queensland's most awarded and trusted private builders.

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# Message from the Managing Director

Our purpose has always been to create exceptional places that enrich the lives of our customers and communities. This responsibility extends beyond the homes we build—it also defines how we conduct business and the standards to which we hold ourselves and our partners.

Modern slavery is a serious violation of human rights, and Mosaic maintains zero tolerance for any practice that compromises individual dignity, safety, or freedom. Although our operations are based in Queensland, we recognise that modern slavery risks can exist within complex supply chains, both domestically and internationally. As such, we take proactive measures to identify, assess, and mitigate these risks across all tiers of our supply network.

Our approach is underpinned by Mosaic’s culture of excellence and integrity. We cultivate long-term relationships with trusted suppliers, apply rigorous governance and due diligence processes, and invest in education and awareness for our people and partners. These actions reflect our values and our commitment to leading responsibly within the property and construction industry.

We acknowledge this is a continuous journey. Mosaic remains committed to strengthening our practices, enhancing transparency, and collaborating with stakeholders to ensure modern slavery has no place in our operations or supply chains.

Thank you for supporting our commitment to a fair, safe, and ethical future for all.



**Brook Monahan**  
Founder & Managing Director  
Mosaic Construction Pty Ltd



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# Our Group Vision & Values

Our vision is to attract and retain exceptional people who share a passion for driving our business forward as a market leader in design, property development, construction, and property asset management.

At the heart of Mosaic is a value-based culture defined by excellence. People choose to build their careers here because of our commitment to delivering quality with consistency in everything we do.

**For us, excellence is not a destination—it is a continual pursuit. Our values guide how we work, how we collaborate, and what we prioritise every day. These values are reflected in the principles below.**

## Our Values



## Our Promise

Enduring value means more than what we build; it's how we build. Mosaic is committed to respecting human rights across our operations and supply chains and to continually improving how we prevent, detect and remediate modern slavery risks.

By holding ourselves and our partners to account, we aim to deliver places that are good for people, sustainable for communities, and worthy of trust over time.

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# The Reporting Entity

Mosaic Construction is a privately owned Queensland-based construction company operating across South East Queensland.

For the purpose of the Act, Mosaic Construction Pty Ltd is the only Mosaic Group entity that meets the reporting threshold for consolidated revenue of at least \$100 million for the reporting period. The principle governing body of Mosaic Construction is the sole director and secretary, Mr. Brook Alexander Monahan.

## Our Structure

Mosaic construction forms part of a wider group of associated companies that operate under the Mosaic brand (the Mosaic Group), these associated entities include:

- Mosaic Property Group Pty Ltd
- Mosaic Development Group Pty Ltd
- Mosaic Property Management Pty Ltd
- Mosaic Caretaking & Letting Pty Ltd
- Mosaic Caretaking & Property Management Pty Ltd
- 84 Latrobe Service Pty Ltd

## About Mosaic

Founded by Brook Monahan in 2004 and rebranded in 2012, Mosaic Property Group is one of Queensland's most awarded and trusted private developer/builders.



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# Mosaic Workforce

During the reporting period, Mosaic employed more than 240 team members across a broad range of operational and professional roles. The Mosaic Group also includes a shared corporate services function that supports the construction activities of Mosaic Construction.

All employees are directly engaged under permanent, fixed-term, part-time, or casual employment arrangements in accordance with relevant industrial instruments and Australian employment legislation. Mosaic's employment practices meet or exceed minimum legal requirements relating to wages, conditions, working hours, and leave entitlements, significantly reducing the risk of modern slavery within our direct workforce.

**Mosaic operates exclusively in Queensland, where robust legal frameworks, regulatory oversight, and community standards uphold and protect individual rights and freedoms.**

While this environment presents comparatively lower inherent risk, Mosaic acknowledges that modern slavery and worker exploitation can still occur within Australia.



*Mosaic maintains zero tolerance for any practice that undermines human rights, and our risk-assessment approach and the actions detailed in this report reflect our commitment to managing and mitigating these risks.*

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# Our Supply Chain

Mosaic engages a broad network of subcontractors, suppliers, consultants, and labour hire providers to support the delivery of its projects. As is common across the construction industry, Mosaic also utilises licensed labour hire providers to meet workforce requirements.

All labour hire engagements must comply with the relevant Modern Award (or better) and the National Employment Standards (NES). Providers are contractually required to warrant that their operations are consistent with the Modern Slavery Act 2018 (Cth) and that they uphold lawful, fair and ethical employment practices.

## **Mosaic's supply chain includes:**

- Local subcontractors and trade partners
- Labour hire providers
- Australian suppliers of construction materials and services
- Overseas manufacturers and product suppliers

While the majority of Mosaic's procurement is domestic, certain materials are sourced internationally from jurisdictions that may present heightened modern slavery risks.

Current overseas procurement includes selected building products sourced from China. These regions can demonstrate elevated risks of forced labour, debt bondage, child labour and other forms of worker exploitation due to variable labour standards, cultural norms and differing levels of regulatory oversight.

**Our risk-assessment processes and supplier-engagement practices reflect this risk profile and form an integral part of the approach outlined in this statement.**

*Mosaic Construction's supply chain predominantly comprises Australian-based subcontractors and trade partners, labour hire providers, and suppliers of construction materials and professional services.*

*In addition, Mosaic sources select building products from overseas manufacturers and suppliers.*



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# Operational & Supply Chain Risks

Mosaic's risk assessment indicates that its exposure to modern slavery risks is primarily associated with the practices of suppliers of goods and labour with whom Mosaic engages.

These risks arise where we have limited direct visibility or influence over employment conditions within third-party operations.

## LOCAL SUBCONTRACTORS & LABOUR HIRE PROVIDERS

Key modern slavery risk areas include:

- **Use of unskilled or low-paid labour**, including on-site labour and cleaning services, which may present vulnerability to exploitation.
- **Increased worker vulnerability** where labour is engaged through third-party labour hire providers rather than directly by Mosaic.
- **Limited visibility of subcontractors' internal employment practices**, particularly where subcontractors engage their own workforce or secondary subcontractors.
- **Potential underpayment or non-compliance with Australian workplace standards** by suppliers, which may indicate exploitative practices.

## OVERSEAS SUPPLIERS & MANUFACTURERS

Key modern slavery risk areas include:

- **Procurement of construction materials manufactured in jurisdictions with elevated modern slavery risks**, including risks of forced labour, child labour, or poor labour protections.
- **Challenges in assessing labour rights, workplace safety and broader human rights compliance** within international supply chains, particularly where Mosaic is not the direct purchaser from the manufacturer.
- **Reduced transparency across multi-tiered, international sourcing arrangements**, making it more difficult to trace the origin of raw materials or verify manufacturing conditions.

Mosaic recognises that the procurement of construction materials from overseas suppliers represents one of the most significant challenges in effectively identifying and managing modern slavery risks.

While these risks cannot be entirely eliminated, Mosaic prioritises increased transparency by focusing on higher-risk suppliers, promoting ethical sourcing practices, and integrating risk-based assessments into its broader approach to modern slavery risk management.



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# Actions Taken to Assess & Address Risks

During the reporting period, the Mosaic Group undertook a range of actions to identify, assess, and mitigate modern slavery risks across its operations and supply chains.

Mosaic considers modern slavery to be unacceptable and incompatible with its values. The actions outlined below reflect our commitment to addressing modern slavery risks responsibly and safeguarding the rights and dignity of all workers.

## DUE DILIGENCE & SUPPLIER OVERSIGHT

- Maintained long-standing relationships with reputable suppliers to improve visibility over supplier culture, labour practices, and ethical standards.
- Included contractual provisions enabling Mosaic to terminate relationships where modern slavery practices are suspected or identified.
- Conducted on-site monitoring of contractors, including observation of labour practices and behaviours, to identify potential non-compliance.
- Required subcontractors to provide a signed **Letter of Guarantee** confirming that all workers engaged have lawful working rights in Australia.
- Required subcontractors to submit **statutory declarations** confirming that all wages, allowances, and entitlements have been paid in accordance with legal requirements.

## LABOUR HIRE & SUBCONTRACTOR CONTROLS

- Recognised the increased vulnerability of migrant and visa-dependent workers engaged through third-party labour hire providers.
- Implemented contractual assurances and compliance documentation to mitigate risks associated with labour hire and subcontractor workforce arrangements.
- Leveraged Australia's strong licensing, regulatory, and compliance frameworks, supplemented by Mosaic's own on-site monitoring and verification practices.

## OVERSEAS PROCUREMENT & SUPPLIER ENGAGEMENT

- Continued direct sourcing of selected building products—including façade systems, joinery, and sanitary ware—from overseas suppliers, primarily in China, to improve transparency and reduce reliance on intermediaries.
- Conducted on-site visits to international manufacturing facilities to observe working conditions and undertake modern slavery risk assessments.
- Maintained frequent international visits and regular engagement with overseas suppliers to continually assess risk and reinforce Mosaic's expectations regarding ethical sourcing and human rights compliance.

## COMPLAINTS & REPORTING MECHANISMS

- Maintained multiple channels for raising concerns or grievances, including:
  - People & Culture team
  - Site leadership teams
  - Anonymous whistleblower hotline
  - Safety team and executive leadership
- Investigated concerns using internal resources and, where appropriate, external expertise, with established escalation pathways for serious or systemic issues.

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# Measuring Effectiveness of Actions

Mosaic measures the effectiveness of its modern slavery risk-mitigation efforts through a range of quantitative and qualitative indicators.

These indicators provide valuable insight into progress, gaps, and opportunities for continual improvement. Effectiveness measures include:

- **Training completion and comprehension outcomes** for relevant employee awareness programs.
- **Results of subcontractor and labour hire due diligence**, including Letters of Guarantee, statutory declarations, and verification of employment rights.
- **Insights from overseas supplier engagement**, such as factory visits and documented supplier risk assessments.
- **Monitoring of grievances, reports, and whistleblower disclosures** received through People & Culture, site leadership, safety teams, executive leadership, and the anonymous hotline.
- **Internal leadership reviews** of modern slavery-related data, incidents, and mitigation actions.
- **Annual review by the Executive Leadership Team** of Mosaic's risk profile and response activities.
- **Biannual analysis of supply chain information**, contractor submissions, and emerging risk trends.

## Future Commitments FY25–27

Mosaic will continue to strengthen its approach to identifying, assessing, and managing modern slavery risks across its operations and supply chains.

**Over the next reporting periods, the following initiatives will be prioritised**

- **Strengthening risk assessment tools and supplier screening processes**, including enhanced application during tender evaluations and procurement activities.
- **Deepening engagement with subcontractors and labour hire providers** to build awareness, capability, and accountability in relation to modern slavery risks.
- **Expanding training and education initiatives**, including mandatory modern slavery eLearning for employees and targeted awareness materials for subcontractors.
- **Enhancing oversight of overseas suppliers** through continued direct engagement, factory visits, and strengthened supplier due diligence activities.
- **Improving data capture, documentation, and internal reporting** to better track risk indicators, supplier compliance, and the effectiveness of mitigation measures.
- **Embedding modern slavery considerations into core governance frameworks**, including onboarding, procurement, contract management, and broader corporate processes.

*Mosaic remains committed to embedding ethical conduct, responsible sourcing, and respect for human dignity into the future of its business, continually strengthening its practices to ensure that modern slavery has no place within its operations or supply chain.*



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# Our Further Commitments

Mosaic recognises that effectively addressing modern slavery risks requires ongoing vigilance, collaboration, and a commitment to continuous improvement.

As its practices evolve, we remain dedicated to strengthening its approach through the following ongoing actions:

- **Ongoing education and awareness** across employees, subcontractors, and key suppliers to build understanding of modern slavery risks and responsibilities.
- **Proportionate, risk-based monitoring** of subcontractors, labour hire providers, and suppliers to ensure visibility and compliance across all tiers of procurement.
- **Regular review and enhancement** of policies, procedures, and contractual controls to ensure alignment with evolving legislation, industry standards, and emerging risk trends.
- **Transparent reporting and strong governance oversight**, supported by ethical business practices and accountable leadership.
- **Strengthening long-term partnerships** with suppliers who share Mosaic's commitment to ethical sourcing, human rights, and responsible business conduct.

## Consultation With Controlled Entities

Mosaic operates under a centralised management and operating model across all entities within the scope of this Statement.

To ensure alignment, consistency and coordinated risk management, consultation occurred through:

- **Shared management and governance structures**, including People & Culture, Safety, Procurement, Finance, and Project Delivery.
- **Cross-functional engagement** between People & Culture, Safety, Procurement, Finance, and operational leaders to coordinate risk assessments, supplier controls, and reporting inputs.
- **Regular communication with senior executives and directors** across the Group to review risks, progress, actions, and disclosures relevant to this Statement.
- **Engagement with associated entities** to ensure consistent awareness, shared understanding of risks, and uniform application of Group-wide policies and procedures.

This approach supports a consistent framework for identifying and managing modern slavery risks across the Group, while recognising that the reporting obligation applies specifically to the Group entity identified as the reporting entity for this Statement.

The Statement has been prepared with input from directors and senior management across all entities in scope.

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# Governance & Accountability

Mosaic is committed to continually enhancing its efforts to educate, raise awareness, and reduce the risk of modern slavery within its operations and supply chains.

We will continue to implement all reasonable measures available to ensure that modern slavery practices do not exist within its business activities.

**Responsibility for ongoing compliance with the Modern Slavery Act 2018 (Cth), including reporting obligations, sits with the Chief Financial Officer, who oversees the coordination of risk management, data collection, and annual reporting processes.**

## Approval by the Principal Governing Body

In accordance with section 16(2) of the Modern Slavery Act 2018 (Cth), this Modern Slavery Statement was approved by the principal governing body of Mosaic Construction Pty Ltd.



**Brook Monahan**  
Founder & Managing Director  
Mosaic Construction Pty Ltd





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