

MODERN SLAVERY STATEMENT 2025

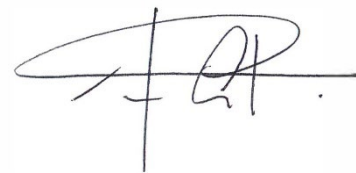
Ferrovial Construction (Australia) Pty Ltd





Ferrovial Construction (Australia) Pty. Ltd. (ACN 150 820 116) (**FCAU**) is committed to conducting its business ethically, responsibly and in a manner that respects and promotes human rights. FCAU recognises the severe impacts that modern slavery and human trafficking can have on individuals and communities and is committed to preventing such practices within its operations and supply chains.

This Modern Slavery Statement is submitted under section 13 of the *Modern Slavery Act 2018* (Cth) to cover the reporting period of 1 January 2025 to 31 December 2025. This Statement was considered and approved by the Board on 30 June 2026.



Antonio Cañete Berenguer
Managing Director
Ferrovial Construction (Australia) Pty Ltd

FCAU's STRUCTURE, OPERATIONS AND SUPPLY CHAIN

STRUCTURE

Established in 2011, FCAU is a privately owned proprietary limited company providing civil construction services in Australia. FCAU forms part of the construction division of the Ferrovial group of companies, ultimately owned by Ferrovial SE (Ferrovial), a global infrastructure operator.

FCAU owns and controls the following corporate entities:

- Ferrovial Construction (New Zealand) Limited;
- Ferrovial Energy Construction Pty Ltd; and
- TSRC O&M Pty Ltd.

OPERATIONS

FCAU is headquartered in North Sydney, New South Wales, with offices throughout New South Wales and Queensland, including Coffs Harbour and Toowoomba. During the reporting period, FCAU maintained an average workforce of 153 employees, including 2 part-time staff members and 3 casual employees. FCAU also engaged 17 independent contractors. FCAU's workforce comprises corporate and administrative personnel, project management and construction workers engaged across head office and its projects.

SUPPLY CHAIN

The goods and materials purchased directly by FCAU depend on the scope, scale and complexity of each project. In addition to project-specific plant and equipment, FCAU's core procurement includes key construction materials such as steel for concrete reinforcement, prestressed concrete steel and cement.

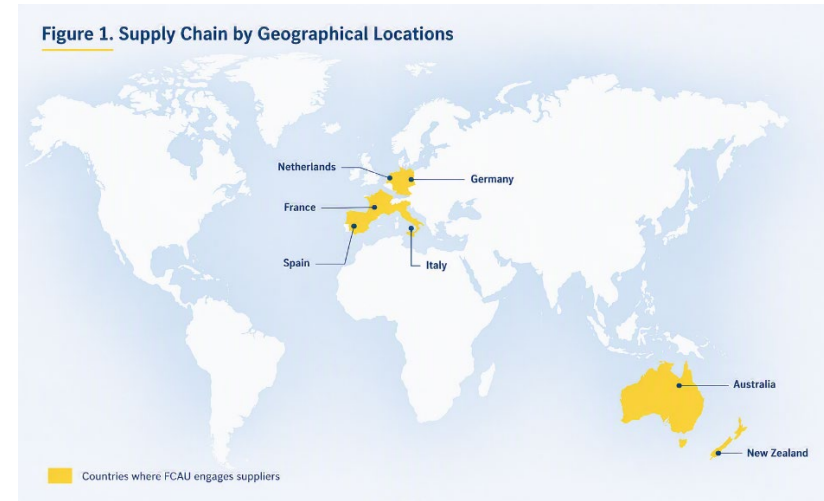
For each project, FCAU undertakes a rigorous market assessment to identify subcontractors with the capability and capacity to deliver defined work packages. This process also considers the availability and depth of supply within local and regional markets. FCAU seeks to maximise participation from Australian, local and regional businesses, including Aboriginal and Torres Strait Islander enterprises, while ensuring that procurement processes remain competitive and transparent.

In 2025, FCAU engaged a diverse range of suppliers across multiple jurisdictions.

Supply Chain by Geographical Location

FCAU's supply chain includes suppliers based in Germany, Spain, France, Italy, the Netherlands and New Zealand (see Figure 1). Notwithstanding this international footprint, FCAU's supply chain remains predominantly supported by Australian-

based suppliers.



Supply Chain by Product Category

FCAU's expenditure is managed across the following key categories:

Category Description	Total Spending
Subcontracts without Materials or Trucking	\$187,783,328.59
Subcontracts with Materials	\$108,679,055.78
Supply Materials and Equipment	\$107,900,197.00
Ancillary Services	\$62,418,605.93
Consulting and Services	\$7,123,660.00
Fuel	\$902,894.09
Spare Parts Machinery	\$658,195.69
Land and Properties	\$618,892.94
Machinery Rental and Hire	\$608,254.46

RISKS OF MODERN SLAVERY

FCAU has undertaken a risk assessment to identify risks of modern slavery in its operations and supply chains, including those of its controlled entities: Ferrovia Construction (New Zealand) Limited, Ferrovia Energy Construction Pty Ltd and TSRC O&M Pty Ltd (**Controlled Entities**).

This assessment considered FCAU's supplier base, procurement categories and geographic risks, as well as the broader construction industry.

FCAU assessed that:

- The risk of modern slavery within FCAU's direct operations is low, due to:
 - the highly regulated nature of the Australian construction industry;
 - compliance with industrial relations laws, enterprise agreements and union oversight; and
 - FCAU's direct employment framework and internal governance controls.

- The primary modern slavery risks that arise within FCAU's supply chains, include:
 - lower-tier suppliers, where FCAU has reduced visibility and oversight; and
 - overseas manufacturing and raw material sourcing, where legal protections and enforcement may be weaker.

FCAU considers that the modern slavery risk profile of its Controlled Entities is consistent with FCAU's risk profile, noting:

- TSRC O&M Pty Ltd operates within Australia under similar regulatory frameworks and policies; and
- Ferrovia Construction (New Zealand) Limited and Ferrovia Energy Construction Pty Ltd were non-operational entities during the reporting period.

Accordingly, the modern slavery risks identified below apply to FCAU and its Controlled Entities.

Outsourcing of Labour

FCAU's business model, consistent with the construction industry, involves the engagement of subcontractors and labour hire providers. This creates a risk profile characterised by multiple layers of contracting arrangements.

Key risk factors include:

- Reduced visibility over employment conditions across subcontracting tiers, particularly for lower-tier suppliers;
- Increased risk that exploitative practices may occur without detection where oversight is limited;
- Exposure to risks associated with migrant workers, who may:
 - face language barriers;
 - be dependent on employers for visa sponsorship; and
 - have limited awareness of workplace rights; and
- Increased vulnerability of low-skilled workers, who may be at higher risk of underpayment, excessive working hours or unsafe conditions.

While the Australian labour hire industry is subject to significant regulation, FCAU recognises that modern slavery

risks may arise indirectly through subcontractors or supply chains, including in relation to the production of goods or services used in FCAU projects.

Procurement of Goods from High-Risk Regions

FCAU procures materials and equipment across multiple jurisdictions, including suppliers based in Europe and New Zealand.

FCAU acknowledges that modern slavery risks are heightened where:

- Goods are sourced from regions with weaker labour protections or enforcement frameworks;
- There is reliance on imported construction materials such as:
 - steel;
 - cement;
 - precast concrete elements; and
 - specialised equipment components; and
- Supply chains involve multiple tiers, limiting traceability of the origin of raw materials.

FCAU will continue to periodically review its operations and supply chains to identify relevant modern slavery risks.

ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY

BUSINESS OPERATIONS

FCAU maintains a framework of policies and procedures to mitigate modern slavery risks across its operations and supply chains. These policies comprise both:

- Ferrovia SE policies, which applies to all subsidiaries including FCAU; and
- FCAU specific policies, implemented at a local level.

Key policies include:

- Anti-Bribery & Corruption Policy;
- Code of Ethics and Business Conduct;
- Corporate Responsibility Policy;
- Human Rights Policy;
- Industrial Relations Policy;
- Modern Slavery Policy;
- Suppliers Code of Ethics; and
- Whistleblower Policy.

These policies apply to FCAU and, where relevant, to its Controlled Entities.

Modern Slavery Policy

FCAU's Modern Slavery Policy establishes a zero-tolerance approach to modern slavery and applies to all employees, contractors and suppliers. The policy:

- Prohibits all forms of forced labour, child labour and human trafficking;
- Requires employees and suppliers to identify and report risks; and
- Supports FCAU's ongoing due diligence and risk mitigation across operations and supply chains.

Human Rights Policy

Ferrovia SE's Human Rights Policy formalises Ferrovia's, including FCAU's commitment to respect internationally recognised human rights. The Policy:

- Prohibits discrimination;
- Prohibits forced labour and child labour; and
- Aligns with the United Nations Guiding Principles on Business and Human Rights.

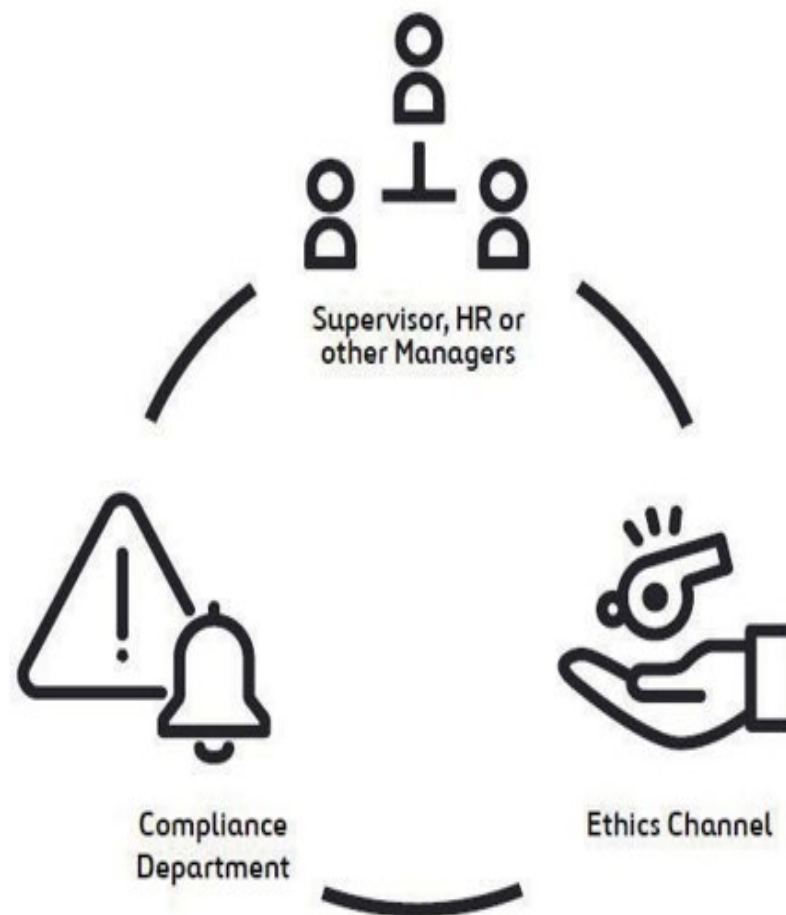
These key policies foster a culture of integrity and compliance within FCAU's business operations and supply chains. FCAU employees, directors and suppliers are required to report any violations of a policy that are actual or suspected in good faith. A report may be made to any of the following:

- An officer, senior manager or executive of any FCAU entity;
- An internal or external auditor, or a member of an audit team conducting an audit, or an actuary of any FCAU entity;
- The Ethics Channel; and
- The Compliance Department.

In addition, all new employees undergo a detailed induction process, which includes information on their rights and benefits, as well as FCAU's and Ferrovial SE's policies. FCAU provides training programs to both new and existing employees designed to promote a zero-tolerance approach to conduct that is inconsistent with FCAU's values and policies, including modern slavery risks.

These training programs are delivered by FCAU's Human Capital Department on a periodic, as-needed basis, having regard to organisational requirements, changes in legislation and identified risk areas. The training forms part of FCAU's broader compliance and Code of Conduct framework and incorporates modern slavery awareness as a key component.

All employees are also informed of the availability of a confidential hotline for reporting incidents or concerns and are encouraged to use this mechanism to report any issues, including those relating to modern slavery



PROCUREMENT AND ENGAGEMENT PROCEDURES

Invitation to Tender and Due Diligence

FCAU has in place strong policies and procedures governing the engagement of its suppliers. These include due diligence measures embedded within FCAU's procurement processes, such as reviews of suppliers' ethical and industrial relation history and corporate background.

As part of this framework, FCAU's Invitations to Tender set out its Code of Conduct expectations, including modern slavery requirements, so that suppliers and subcontractors understand FCAU's compliance obligations before submitting a tender.

Further, all suppliers and subcontractors tendering to work for FCAU are required to complete a comprehensive tender questionnaire. This questionnaire assesses the tenderer's capability and compliance across:

- Industrial relations systems and practices;
- Safety management;
- Quality management;
- Environmental management; and
- Business capability and governance.

Tender submissions are evaluated against these criteria during the contractor selection and approval process.

Contractual Measures

Upon selection and contract award, suppliers enter into contracts that include specific clauses referencing applicable corporate social responsibility and ethical standard obligations. These clauses:

- Require ongoing compliance with the relevant procurement requirements and Industrial Relations laws and guidelines, including fair work practices;
- Recognise and commit to the continued improvement of corporate social responsibility and sustainable development as set out in the Ten Principles of the UN Global Compact;
- Require ongoing compliance with the principles and commitments set out in FCAU's Corporate Code of Ethics and Suppliers Code of Ethics policies;
- Require suppliers to have and maintain in place throughout the term its own policies and procedures, including adequate procedures under the relevant requirements;
- Require suppliers to provide a copy of their enterprise agreements prior to commencing onsite and notifying the FCAU project leads of any sub-labour hire agreements;
- Provide FCAU the authority to audit suppliers and their supply chains at any time; and

- Provide FCAU with the right to terminate the contract if it determines that the supplier is in breach or has breached its corporate social responsibility or ethical standard obligations.

Under FCAU's standard contracts, direct suppliers and subcontractors are liable and responsible for the conduct, defaults, acts and omissions of any secondary subcontractors and employees and agents of secondary subcontractors as if they were conduct, defaults, acts or omissions of the supplier. These contracts are periodically reviewed.

Ongoing Monitoring

Once engaged, suppliers and subcontractors are subject to ongoing monitoring. The Project Director (or senior manager responsible for the subcontractor or supplier) is responsible for assessing and continually monitoring the risk and ensuring that an appropriate level of monitoring is always applied to each subcontractor or supplier.

Audits of subcontractors and suppliers are included in the project audit schedule managed by the Commercial Director. Audits involve on and offsite interviews with works, interviews with management personnel, review of company documentation and an inspection of the workplace. The scope and frequency of audits is determined by the Commercial Director in consultation with FCAU's representative responsible for managing the subcontractor and supplier and the Project Director. A typical audit frequency for a moderate risk external provider is:

- Annually for a system audit where there is no third party certification.
- Quarterly where the quality controls/ record audit relates to specific scope.

ONGOING COMPLIANCE MANAGEMENT

FCAU maintains continuous compliance management, which includes prevention, education and monitoring strategies aimed at reducing the risks of modern slavery. FCAU:

- Provides modern slavery risk awareness training to employees, equipping them with the knowledge and skills needed to identify indicators of modern slavery and understand compliance requirements during the procurement process and across FCAU's broader supply chain. While no formal modern slavery training was delivered during the 2025 reporting period, such training is provided on an ad hoc basis as required, having regard to operational needs and emerging risk areas. A training session is scheduled for the 2026 reporting period;
- Engages independent third-party auditors to conduct Industrial Relations audits of subcontractors engaged on FCAU's projects. These audits are structured to assess compliance with labour laws, workplace standards and modern slavery obligations, enabling early identification and rectification of any risks or breaches within the supply chain. During the 2025 reporting period, these audits were conducted at the project level; and

- Requires suppliers to submit a signed statutory declaration confirming that they are meeting all contractual commitments, including compliance with Industrial Relations requirements and relevant guidelines, as part of the payment process. Payment processing is strictly contingent on receipt and satisfactory review of this declaration.

In addition to these measures, FCAU regularly reviews and updates its compliance management systems, policies and procedures to ensure they align with evolving legal requirements and industry standards. FCAU also encourages open communication and reporting of concerns, fostering a culture of transparency and continuous improvement in its efforts to combat modern slavery.

EFFECTIVENESS ASSESSMENT

FCAU assesses the effectiveness of its modern slavery risk mitigation measures through a range of monitoring mechanisms, including:

- Periodic review of supplier compliance with contractual industrial relations and modern slavery obligations;
- Annual review of FCAU's policies, procedures and compliance management systems to ensure alignment with evolving legal requirements and industry best practice;
- Monitoring the outcomes and findings of independent third-party Industrial Relations audits conducted on subcontractors;
- Reviewing the number and nature of reports received through FCAU's reporting channels;
- Tracking completion of employee training and awareness initiatives relating to modern slavery and broader Code of Conduct obligations;
- Monitoring supplier engagement processes, including due diligence outcomes at tender stage and any supplier risk flags identified during procurement;
- Assessing the effectiveness of contractual controls, including the enforcement of audit rights and remedial actions where non-compliance is identified;
- Reviewing trends and recurring issues identified through audits, reporting channels or supplier engagement processes to identify systemic risks; and
- Periodic reassessment of FCAU's modern slavery risk profile, including consideration of changes to procurement activities, supply chain composition and geographic exposure.

Insights derived from these monitoring mechanisms are used to inform continuous improvements of FCAU's modern slavery risk management framework, including refinement of policies, procedures, training programs and supplier engagement practices.

CONSULTATION

This Statement was prepared in consultation with FCAU's Controlled Entities. Consultation was undertaken through engagement with directors and senior management, including via board meetings where there are common directors across FCAU and its Controlled Entities.

Feedback received from the controlled entries was considered in finalising this Statement prior to board approval.

Ferrovial Construction (New Zealand) Limited and Ferrovial Energy Construction Pty Ltd were non-operational during the reporting period. Consultation confirmed that their modern slavery risk profiles are aligned with FCAU and that no additional material risks were identified.



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