



MODERN SLAVERY STATEMENT
FY25/26

Company Name (Legal entity name):	Australian Restoration and Construction Pty Ltd
Business Postal Address:	HQ Level 1/832 Southport Nerang Rd, Nerang QLD
Company Phone Number:	1300 728 225
Australian Company Number (ACN):	169 552 416
Australian Business Number (ABN):	42 169 552 416

1. INTRODUCTION & PURPOSE

Australian Restoration and Construction Pty Ltd is deeply committed to upholding the highest ethical standards and protecting human rights across all areas of our operations and supply chains. We recognise the critical importance of the Modern Slavery Act 2018 (Cth) and are dedicated to eliminating all forms of modern slavery, including forced labour, child labour, debt bondage, human trafficking, and other exploitative practices.

This statement underscores our firm stance that modern slavery is a serious violation of human rights. It encompasses various forms of abuse, such as slavery, servitude, forced labour, and human trafficking—each rooted in the same fundamental injustice: the deprivation of an individual's freedom for exploitation and personal or commercial gain. As an organisation, we are resolutely opposed to all forms of slavery and are committed to promoting ethical business practices that protect workers from abuse and exploitation. This commitment extends beyond our own operations to include our entire supply chain.

We are determined to reduce the risk of modern slavery within our business and maintain transparency in how we address this issue within our supply chains. This Modern Slavery Statement details the ongoing actions we have taken, and will continue to take, to identify, assess, and mitigate risks related to modern slavery.

The statement covers the period from 1 July 2024 to 30 June 2025 and has been prepared in accordance with the reporting requirements of Australia's Modern Slavery Act 2018 (Cth) and associated guidelines (See Annexure). The Statement has been approved by the Board of Directors of Australian Restoration and Construction Pty Ltd, affirming our commitment to transparency and accountability. We expect our employees and suppliers to share this commitment and work collaboratively to ensure that modern slavery has no place in our operations or supply chain.



Jordan Powell
Director



Ben McArthur
Director



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2. Corporate Structure, Operations and Supply Chains



2.1 STRUCTURE

Australian Restoration and Construction Pty Ltd (ABN 42 169 552 416) (ARC Projects) operates under the legal entity Australian Restoration and Construction Pty Ltd, trading under ARC Projects Corporation (ABN 70 655 207 471).

Founded in 2014 by Directors Ben McArthur and Jordan Powell, ARC Projects initially entered the insurance repair sector as subcontractors providing carpentry services for other repairers.

Recognising an opportunity to improve the quality of repairs and service, ARC Projects was established to directly partner with insurers.

Today, ARC Projects operates across Queensland, New South Wales, the Australian Capital Territory (ACT), Victoria, Tasmania, and New Zealand, with a staff of over 179 employees and a subcontractor network of more than 2,000.

The company generates over \$130 million in annual revenue, qualifying as a reporting entity under the Modern Slavery Act 2018 (Cth).



179+



11+



115+



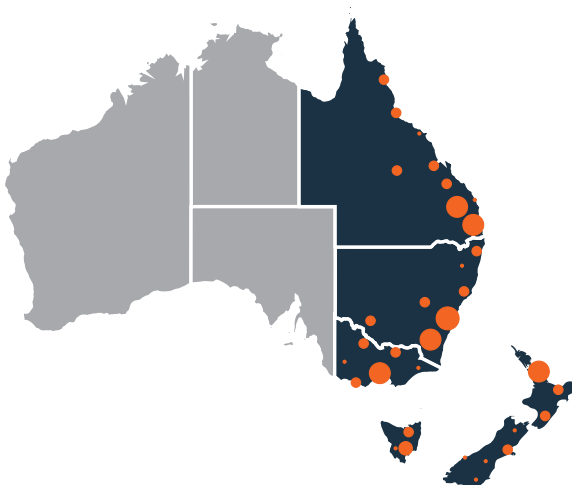
2000+



6



\$130m^{REV}



LOCATION	STAFF
Queensland	104
New South Wales	12
ACT	4
Victoria	51
Tasmania	3
New Zealand	5



2.2 OPERATIONS

ARC Projects is a market leader in the insurance repair industry, providing integrated building services across the residential and commercial sectors. We deliver end-to-end solutions for building insurance repairs, focusing on restoration, makesafe services, and construction/repair services.



Restoration: Our team of restoration professionals provides top-tier services for residential and commercial structures affected by fire, flood, liquid escape, and odours.



Makesafe: We provide a 24/7 emergency make-safe service across Australia, ensuring the immediate safety of affected properties.



Construction/Repairs: ARC Projects manages commercial and residential construction projects, deploying specialised trades and ensuring high-quality craftsmanship.



2.3 SUPPLY CHAINS

ARC Projects operates as a Principal Contractor on insurance repair and construction projects. We employ staff across various roles, including estimating, project management, administration, and other support functions. To the best of our knowledge, there is no modern slavery in our direct business operations. We are committed to ethical and transparent practices in all our dealings and relationships.



Our supply chain consists primarily of subcontractors, who provide essential building services, as well as suppliers of construction materials. Most of our materials are sourced from well-known national retailers such as Bunnings, which submits a Modern Slavery Statement. We also work with specialist suppliers for roofing, structural timber, and waterproofing systems.



We engage around 2,000 subcontractors and suppliers, with an estimated \$89 million in supply chain spend in FY24.

While the majority of our suppliers are based in Australia, we acknowledge that risks related to modern slavery can exist, especially with subcontractors in the construction and cleaning sectors and when sourcing materials from regions with higher modern slavery prevalence.

3. Modern Slavery Risks



3.1 RISK ASSESSMENT APPROACH

ARC Projects undertakes comprehensive and ongoing risk assessments to identify, evaluate, and monitor potential modern slavery risks within both our direct operations and broader supply chains. These assessments are informed by specialist input from experienced industry professionals and are supported by reputable external data sources, including the Global Slavery Index and other recognised research frameworks. In addition, we actively engage with a wide range of stakeholders, including clients, contractors, industry associations, and relevant government bodies, to gather informed perspectives, validate our approach, and remain aware of emerging and evolving risk areas.

The outcomes of our FY25 assessment align with the findings of the previous reporting period, with no material changes identified in the nature, severity, or extent of modern slavery risks across our operations or supply chains. This consistency reflects the effectiveness of our existing governance, employment, and procurement practices.

While the construction industry is widely recognised as having an inherent exposure to certain modern slavery risks, ARC Projects has implemented a range of proactive controls and mitigation measures. These measures, outlined in the following section titled Assessment of Risk and Risk Mitigation Actions, are designed to significantly reduce, manage, and respond to identified risks in a structured and accountable manner.



HOW WE ASSESS RISK

- Ongoing risk assessments across operations and supply chains
- Informed by industry expertise
- Benchmarked against trusted sources (e.g. Global Slavery Index)



STAKEHOLDER ENGAGEMENT

- Clients
- Contractors
- Industry associations
- Government bodies



ASSESSMENT OUTCOME

- FY25 results consistent with FY24
- No material change to risk profile
- No increased exposure identified



INDUSTRY CONTEXT

- Construction industry carries inherent modern slavery risks
- ARC Projects acknowledges sector-wide exposure



RISK MITIGATION

- Strong governance frameworks
- Supplier due diligence
- Ongoing monitoring and controls





3.2 LOW RISK OPERATIONS

We consider the risk of modern slavery in our direct operations to be low. This is due to the following factors:

All workers are directly employed under lawful contracts that adhere to Fair Work legislation.

Strict compliance with Work Health and Safety (WHS) obligations, as well as industry awards, ensures fair and safe working conditions.

A robust internal HR framework supports fair treatment, safeguarding employee rights, and promoting ethical employment practices.



3.3 INDIRECT SUPPLY RISKS

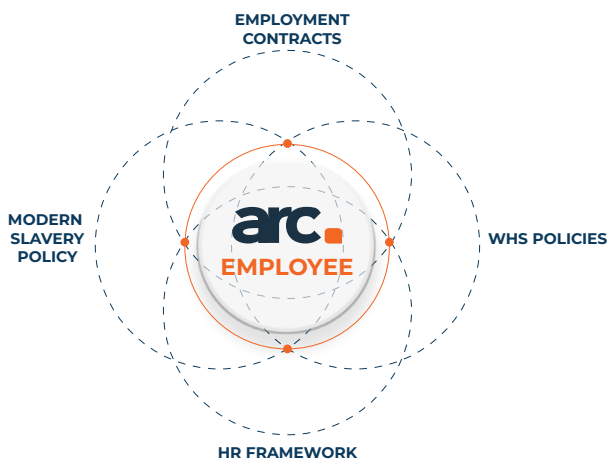
We have identified higher potential risks in our indirect supply chains, particularly in the following areas:

The use of subcontractors in the construction and cleaning sectors, where migrant or vulnerable workers may be employed in conditions that are more susceptible to exploitation.

The procurement of materials such as timber, electronics, and garments, which have been flagged as high-risk products for modern slavery in global supply chains.

These goods often originate from regions with less robust labour protections, making them more vulnerable to forced labour and exploitation.

Despite these higher-risk areas, ARC Projects is committed to taking proactive steps to mitigate these risks through due diligence, rigorous supplier screening, and ongoing engagement with all stakeholders.



4. Assessment

In the fiscal year 2025, ARC Projects has assessed the risk of modern slavery within its operations to be low. This conclusion is supported by a robust framework of human resources policies and procedures that ensure full compliance with all legal employment entitlements and awards across the workforce. These policies apply to all ARC Projects entities under our control in both Australia and New Zealand.

Our risk assessment process considers the Continuum of Involvement in modern slavery, ranging from 'causing', 'contributing', and 'directly linked to'. The severity of risks is assessed based on their scale, scope, and irremediable character. The table below outlines our categorisation of potential risks:

Supply Chain Tier	DESCRIPTION	RISK RATING
Cause	Directly causes modern slavery	Direct employment of ARC Project Employees
		Low – operations conducted within Australian and NZ legal frameworks - There is no risk of MS occurring in our direct operations, due to combination of policy and procedures, adherence to legislative requirements and all workers paid above industry awards. No with holding of visas etc
Contribute	Contributes to modern slavery practices	Very Low Risks: <ul style="list-style-type: none"> • Subcontracted workers on projects: Workers are Australia-based, with verified consultation processes and self-reporting confirming pay meets or exceeds Industry Awards. • Energy, office supplies, plant and machinery suppliers: Mostly reputable reporting entities with established compliance frameworks and low risk profiles. • Construction material retailers: Suppliers of raw and processed materials are generally large, reputable reporting entities operating within regulated markets. • Logistics and transport providers: Predominantly established reporting entities with low risk profiles supporting compliant supply and transport of materials.
		Medium – potential risk through subcontractor and supplier actions <ul style="list-style-type: none"> • Mining and fabrication of construction materials and fuels may involve offshore providers and international freight, though most suppliers are reputable Australian-linked reporting entities
Directly Linked	Linked through business relationships	Medium – procurement from suppliers or countries with higher modern slavery prevalence

Given the highly regulated environment in Australia and New Zealand, the risk of modern slavery within ARC Projects' direct operations is considered minimal. This is further mitigated by adherence to national wage laws, careful monitoring by our Leadership, Payroll, and Compliance teams, and the establishment of grievance mechanisms for employees.



SUPPLY CHAIN RISKS

The highest risks associated with modern slavery are found within our supply chain, particularly where imported goods are involved.

While we acknowledge the inherent risks in sourcing materials and services from regions with a higher prevalence of forced labour, ARC Projects actively manages these risks through thorough due diligence, contractual controls, and continuous monitoring.



We recognise that certain national and international suppliers—especially those based in regions like China and India, where modern slavery risks are more prevalent—may be involved in the production of goods such as garments, electronics, and timber. These products are globally flagged as high-risk for forced labour, particularly in industries reliant on low-wage, migrant labour, and state-imposed forced labour.

Furthermore, within our national supply chain, we have identified that certain local suppliers—such as those in the cleaning, maintenance services, and courier sectors—may present a higher exposure to modern slavery risks, especially

when subcontractors are involved. While the risks within our Australian operations are considered lower due to our stringent compliance processes and the majority of our supply chain operations in /Australia only, we remain vigilant and committed to working with suppliers and subcontractors that share our ethical commitment to preventing modern slavery in their own operations and supply chains.

ARC Projects maintains long-term, trusting relationships with our suppliers and subcontractors, all of whom have strong reputations for ethical practices. We actively promote transparency and encourage open communication to ensure that modern slavery is not occurring in any part of our operations or supply chain.



While the construction and restoration sectors in which we operate are globally recognised as areas with heightened modern slavery risks, particularly due to the potential vulnerability of migrant workers, ARC Projects takes a proactive approach to minimise such risks.

5. Risk Mitigation Actions



DIRECT EMPLOYEES

All direct employees are employed on an individual basis in accordance with Australian Laws. This removes any risk of Modern Slavery in our direct workforce. Where ARC projects directly employ any person who is not an Australian Citizen, we monitor the scope and currency of visas to ensure compliance, and do not keep hold of physical copies of visas, passports, or any other document pertaining to ability to freely leave.

We also implement a variety of policies that support and strengthen our efforts to the elimination of modern slavery within our supply chain including;

- Modern slavery policy
- Work health and safety policy
- Health and wellbeing policy
- Diversity and equal opportunity policy
- Conflict of interest policy
- Grievance handling policy
- Anti corruption and bribery policy

ARC Projects maintains a Grievance Policy, offering a confidential mechanism for employees, subcontractors, and third parties to report unethical behaviour, including suspected modern slavery practices. Reports are investigated and resolved promptly, ensuring protection against retaliation.





SUBCONTRACTORS & SUPPLIERS

When onboarding new suppliers or subcontractors, we assess modern slavery risks by reviewing corporate policies, supply chain mapping, and examining labour practices. New suppliers are also assessed for their commitment to ethical sourcing and compliance with the Modern Slavery Act.

We also ensure that all contractors are aware of modern slavery risks and are required to implement modern slavery provisions in their operations. For larger suppliers, we review their Modern Slavery Statements and compliance.

We conduct pre-qualification checks and compliance documentation for all contractors. Ongoing training on modern slavery risks and responsible sourcing practices is provided within our induction and safety training packs, ensuring that contractors are well-informed about their obligations.



ARC Projects promote the engagement of the following types of subcontractors/suppliers:

- Local businesses with known workforces
- Promote the use of Australian products where possible
- Use known subcontractors with proven record of compliance
- Preference for majority direct workforce rather than labour hire workers
- Any identified breaches of Modern Slavery compliance are recorded in formalised process that notifies all other staff involved in the procurement process – including historical breaches.
- Promote the use of 'established' companies where overseas products must be used where companies have Modern Slavery compliance systems in place. · Reviews conducted on our suppliers include informing other staff involved in the procurement processes of the business of any breaches or areas of high risk, along with promotion of low risk alternatives to current suppliers.



If modern slavery practices are suspected to have occurred in our subcontractor or supplier network, the following process will be implemented:

- Suspend the Subcontract / Supply of Materials
- Investigate the activity to confirm if there is Modern Slavery (as defined by legislation) occurring
- Report Modern Slavery practices to appropriate authorities
- Discontinue to use the offending Subcontractor or Supplier permanently, or if this is not reasonably practicable, suspend the use of the Subcontractor or Supplier until the Modern Slavery event / risk is resolved and sufficient measures are put in place by the organisation to prevent the re-occurrence of Modern Slavery.

6. Assessing the Effectiveness of Action



ASSESSMENT

To assess the effectiveness of our actions against modern slavery, ARC Projects regularly engages with suppliers through our modern slavery questionnaire to evaluate their efforts in preventing exploitation. We incorporate modern slavery risk assessments into our procurement processes, ensuring that new suppliers meet our ethical standards and comply with relevant legislation.



SUPPLIER



EVALUATION



REVIEW



ONBOARD

We conduct annual reviews of modern slavery risks across our operations and supply chains, including tracking contractor education and monitoring supplier compliance through spot checks and audits. Additionally, the Supplier Code of Conduct is periodically reviewed to ensure its alignment with best practices and legal requirements.



TRAINING



SUPPLIER



SPOT CHECK

To ensure continuous improvement, ARC Projects commits to refining its processes, training, and interventions based on feedback and risk assessments. Progress and gaps identified are reported to senior management and the Board for oversight, ensuring that our actions remain effective in mitigating modern slavery risks.

7. Consultation with Entities Owned or Controlled & Approval

In preparing this statement, ARC Projects has engaged relevant management across our business to identify modern slavery risks in our operations and supply chains as appropriate. This modern slavery statement was approved by the board of Australian Restoration and Construction Pty Ltd on 15 October 2025

8. Looking Forward, Continuous Improvement



ASSESSMENT

We are in the process of launching a supplier/contractor launch page, which is designed to assist with onboarding and compliance requirements. As a part of this, there will be the modern slavery saved in there for them to complete and sign off on. ARC Projects is launching a modern slavery questionnaire for all subcontractors, regardless of current onboarding status. This survey is designed to detect and evaluate potential risks, both known and unknown, associated with unintentional modern slavery within our supply chain. Our commitment to proactive risk assessment underscores our dedication to addressing and mitigating any threats related to modern slavery across our subcontractor network.

ARC Projects is actively identifying opportunities for refinement and enhancement within our whistle-blower framework. We are working to develop a comprehensive scope that delves into exploring grievance reporting mechanisms and processes. This initiative underscores our commitment to continually improving and ensuring the effectiveness of our systems for reporting grievances and addressing concerns within our organisation.

In FY26, ARC Projects plans to:



ASSESSMENT

- Develop and implement a supplier self-assessment questionnaire



TRAINING

- Formalise a modern slavery training program for internal staff



MAPPING

- Conduct deeper supply chain mapping to tier 2 and 3 suppliers



COLLABORATION

- Increase collaboration with industry bodies on modern slavery risks



EXPLORATION

- Explore options for independent audits of selected high-risk suppliers

9. Annexure: Modern Slavery Act 2018 (Cth) Compliance Table

Mandatory Criteria	PAGE IN STATEMENT
Identify the reporting entity	Cover page & Section 2. Corporate Structure, Operations and Supply Chains
Describe the structure, operations and supply chains	Section 2. Corporate Structure, Operations and Supply Chains
Describe risks of modern slavery practices	Section 3. Modern Slavery Risks
Describe actions taken to assess and address those risks	Section 4. Assessment of risk and Section 5. Risk Mitigation Actions
Assess effectiveness of actions	Section 6. Assessing the Effectiveness of Actions
Describe consultation with owned/controlled entities	Section 7. Consultation with Entities Owned or Controlled & Approval
Provide other relevant information	Additional documents can be provided upon request.

THANK YOU

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