



## **Modern Slavery Commitment**

Date: November 2025

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## Our Purpose

The purpose of this statement is to set out Bielby's position on Modern Slavery and our actions and responsibilities in relation to such matters. This is our fifth statement under the Modern Slavery Act (2018) and covers the Financial Year 2024/2025. This statement outlines our approach to ensuring that Bielby has robust frameworks and processes in place to minimise the risk of modern slavery in our business operations and supply chain. It also outlines our activities undertaken in relation to modern slavery for the past twelve months.

## Our Policy Commitment

Human rights are the basic standards of treatment to which everyone is entitled, regardless of gender, race, nationality, economic status, or religion.

Bielby is committed to an organisational culture which implements a policy of support for internationally recognised human rights. We support the principles contained within the Universal Declaration of Human Rights, the UN Guiding principles on Business and Human Rights, the ILO Core Conventions on Labour Standards, and the Australian Modern Slavery Act.

Bielby is committed to supporting the fundamental human rights of our people, as well as the people we work for and work with.

At Bielby, we treat our people with fairness, respect, and dignity, we follow practices that promote physical and psychological health and safety, and we lead aligning with our core values.

We reject any activities which may cause or contribute to forced or bonded labour, child labour, human trafficking, slavery, servitude, forced marriage or deceptive recruiting for labour or services (modern slavery).

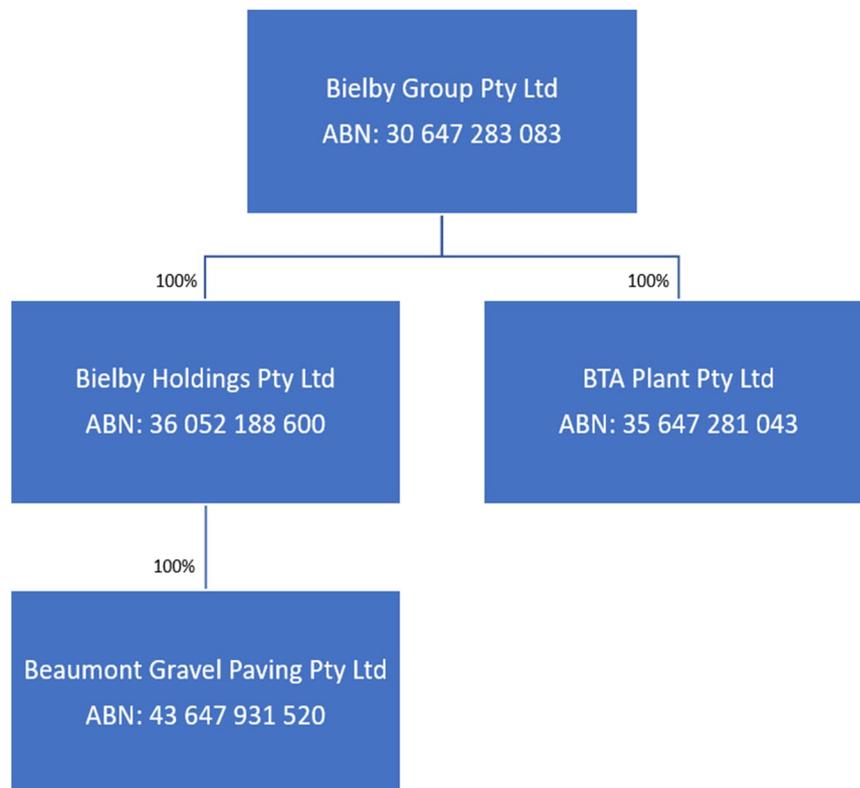
Our people, suppliers and business partners must understand our commitment to upholding human rights and should ensure that they comply with these commitments when they are performing work for Bielby or when representing Bielby.

## Our Business and Supply Chain

Bielby is a privately owned and operated Queensland based, civil engineering group, providing leading earthworks and infrastructure capabilities to clients across Australia.

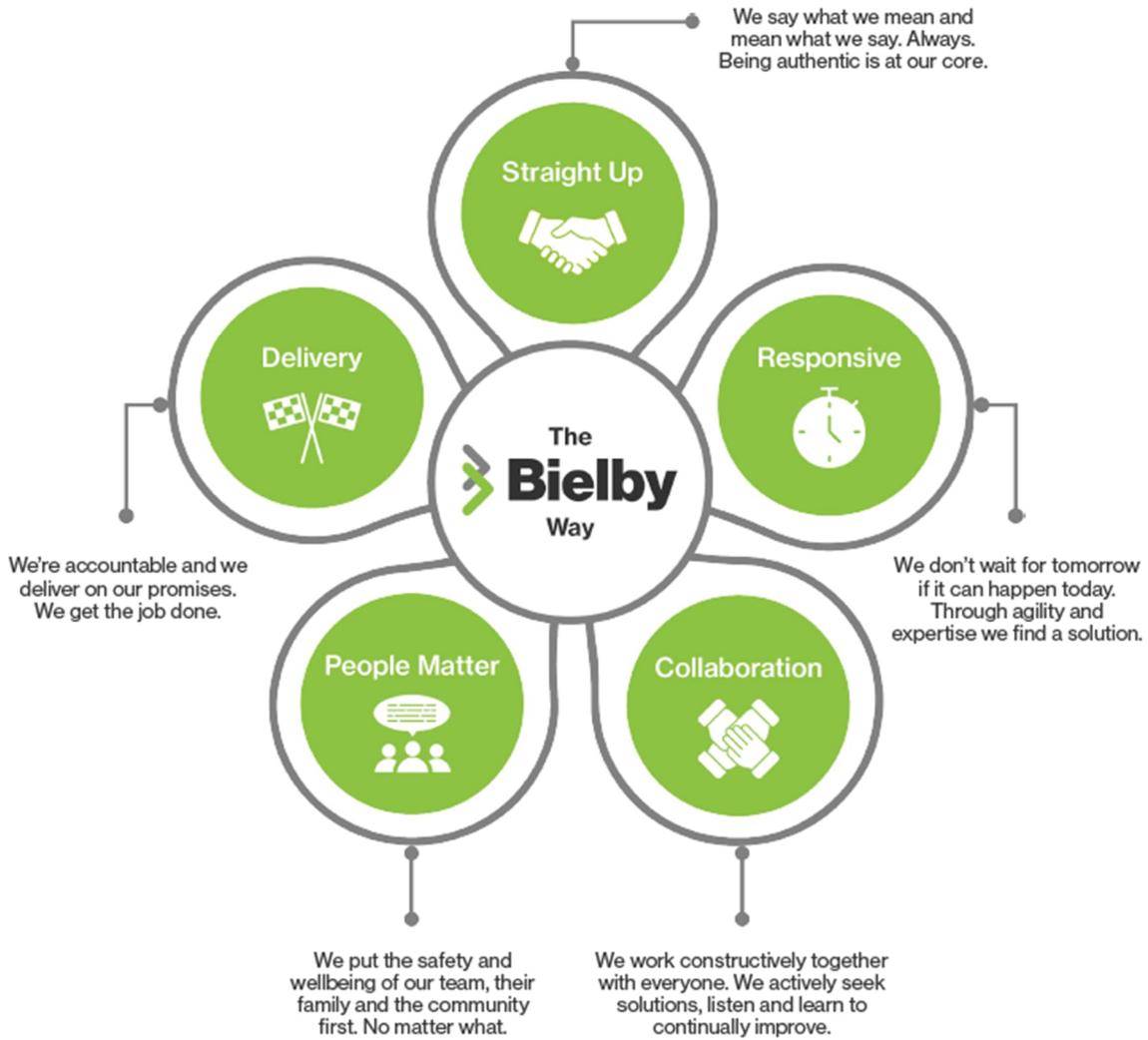
Established in 1991, the core trading entity, Bielby Holdings Pty Ltd, has recognised relationships with subcontractors and suppliers, both long term and new, who are engaged as required based on pre-evaluation criteria at appointment of any new work contract awarded.

As of November 2025, Bielby Holdings Pty Ltd has 170 direct employees and approximately 500 suppliers and subcontractors in its supply chain.



We engaged with each of the reporting entities covered by this statement and consulted the entities we own or control. This collaborative effort ensured diverse perspectives were considered and strengthened our commitment to addressing the risk of modern slavery across our operations.

## Our Values



## Our Modern Slavery Risk Management

In Australia the Global Slavery Index 2018 (GSI) has a low prevalence of modern slavery, however Bielby is committed to monitoring and ensuring our business practices and those with whom we work for, work with or sub-contract to comply.

Bielby follows a structured risk management process involving us identifying, reviewing, rating, controlling and then monitoring the controls to ensure the risk is being effectively managed. As our business model involves both a self-performing and sub-contracting models, we consider we have significant visibility of all areas of management when self-performing and can ensure we are meeting the expectations of our policy commitment. Through our tendering and supply chain assessment, selection, and management processes we can mitigate our risk when sub-contracting, through utilising well recognised and renowned Australian companies, who align with our values, culture, and commitments.

## Our Actions to assess and address modern slavery risks

Bielby Has:

1. Continued to review and focus on its commitment to Human Rights and the reduction of Modern Slavery and the impacts it could have on our business.
2. Continuously reviewed our supply chain risks, have assessed which products, services, companies, and geographics, may pose the greatest ongoing risk and/or could have a change to its risk profile in relation to modern slavery.
3. Reviewed and prioritised our risk areas.
4. Reviewed the Code of Conduct which is distributed to all employees and has clearly documented our Modern Slavery commitments and expectations.
5. Reviewed all our commercial contracts and have implemented new requirements for our sub-contractors and suppliers regarding our expectations in regard to modern slavery.
6. Reviewed our procurement company policies and practices, which were implemented through a new financial management system that helps to limit our risk of modern slavery in our operations and supply chains.
7. Continued to require, as a part of our tender process, for Modern Slavery questions to be completed by our sub-contractors and suppliers, and have implemented a review and action process for these answers.
8. Reviewed Modern Slavery statements of our sub-contractors, joint venture partners and suppliers and limited engagement where our minimum standards for modern slavery were not met.
9. Communicated our modern slavery commitments to our Senior Management team, new team members and those involved in our procurement activities.
10. Continued to advise those involved in our procurement of government reporting if we believe we may have identified modern slavery practices.

Over the next year Bielby will:

1. Continue to utilise our internal risk management process to identify and manage modern slavery risks.
2. Continue to train the Bielby Senior Management Team and those involved in procurement activities in modern slavery commitments and obligations.
3. Continue utilising the Tackling Modern Slavery in Supply Chains document by Walk Free Foundation as an information and training tool.
4. Continue to utilise the Responsible Sourcing Tool as a resource.
5. Continue to train all staff in Bielby Code of Conduct.
6. Continue to periodically review the Modern Slavery Statements of our greatest suppliers, sub-contractors and joint venture partners, for compliance.
7. Continue to communicate reporting process to all involved in the Bielby business where Modern Slavery is alleged to have been identified, including reporting to Government Agencies.

## Our Effectiveness / Performance Indicators

We are committed to ensuring that our efforts to identify, manage and mitigate modern slavery risks are meaningful and continuously improving. To assess the effectiveness of our actions, we apply the following measures:

### **Internal Auditing**

We conduct regular internal audits of our systems, processes and compliance activities. These audits assess whether our modern slavery controls have been implemented as intended and identify any areas requiring corrective action or further development.

### **Risk Monitoring and Review**

All identified risks are recorded in our Risks and Opportunities Register. This register is monitored on an ongoing basis and formally reviewed each month by the Senior Leadership Team and annually by the Board. These reviews allow us to evaluate whether current mitigation activities are effective and whether new or emerging risks require additional measures.

### **Whistle-blower Reporting**

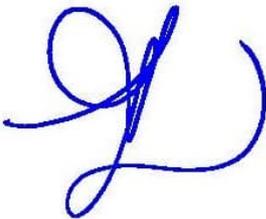
We maintain a Whistle-blower policy and procedure that enables employees, clients, subcontractors and other stakeholders to confidentially report allegations of improper conduct relating to our business operations or supply chain. The trends, nature and outcomes of any reports received provide an important measure of the effectiveness of our risk-management activities.

### **Continuous Improvement**

Insights gathered through audits, risk reviews, and stakeholder reporting are used to strengthen our policies, procedures and training programs. This ensures that our approach remains robust, compliant and responsive to the evolving nature of modern slavery risks.

## Approval

This statement was approved by the board of Bielby Group Pty Ltd, in their capacity as principal governing body of Bielby Group Pty Ltd, on 3 December 2025.



Adam Edwards  
Managing Director  
Dated: 3 December 2025



Terence Cogill  
Executive Director  
Dated: 3 December 2025

**Thank you.**