



CIP Constructions

Modern Slavery

Reporting period July 2024 – June 2025

Policy
August 2025

We are committed to addressing the risks of modern slavery across our business through proactive engagement with our team members, clients, business partners, and suppliers.

Introduction

In this – our annual statement – we detail how we are reviewing our business operations. Through working with our business partners in detecting the risks of modern slavery in our business and supply chain, we are acting in accordance to the requirements of the Modern Slavery Act 2018 (Cth). CIP Constructions Group provides design and construction management services for clients across the industrial and commercial sectors.

Our experience and innovativeness combine to deliver exceptional service to our clients. The interdisciplinary knowledge and experience that we have, is proven in our building practices which span from small distribution facilities to technically advanced business parks and industrial facilities. The CIP Constructions' Group in-house design teams are involved throughout the design and delivery process to ensure that each component meets and surpasses best practice construction.

Our transparent and open approach in communication is reflected in the long-term relationships that we develop with our clients, consultants, subcontractors, and suppliers. CIP Constructions is driven by our collective efforts, and we place importance on good communication, mentorship, teamwork, knowledge, and expertise.

We know that our team members are our most important asset and we actively encourage diversity – in every way – in our teams.

Introduction

Who we are

The brand name CIP Constructions Group is synonymous with an extensive portfolio of commercial and industrial builds across the Australian mainland since inception of the founding company.

What we do

We provide design and construction management services to suit our clients' or their tenants' needs and functional requirements.

Our roots are in construction, with experience and innovation combining together to deliver a personalised and progressive approach to our clients.

Our experience and interdisciplinary knowledge of proven building practices, spans from small distribution facilities to technically advanced business parks and industrial facilities.

We are a service focused business, and we proactively engage with our Clients, suppliers and business partners to achieve best practice outcomes.

Our transparent and open approach is reflected in the long-term relationships that we develop with our Clients Consultants and construction partners.

Our Team

We are a diverse, experienced team of construction professionals positioned across our operating locations in Queensland, New South Wales, Victoria, South Australia and Western Australia.

Our business is driven by our collective efforts and, we value effective communication, mentorship, teamwork, knowledge and expertise.

Governance & Structure

CIP Constructions is an Australian, family-owned national business with offices in New South Wales, Queensland, Victoria, West Australia, and South Australia. Our construction capabilities centre on the industrial and commercial sectors – servicing a wide range of well-known developer and commercial clients.

All projects are delivered via early contractor involvements, design & construct, managing contractor, and traditional construction methods of procurement. CIP Constructions comprises of the following industries (listed below) which are registered in Australia and governed by a board of directors.

References in this statement to CIP Constructions refers to the reporting entities of:

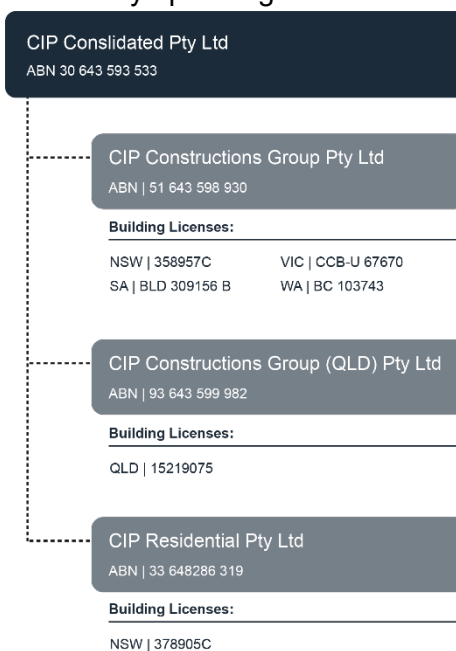
CIP Consolidated Pty Ltd

*CIP Constructions Group
Pty Ltd*

*CIP Constructions Group
(QLD) Pty Ltd*

Our construction business is delivered through CIP Constructions Group Pty Ltd, and CIP Constructions Group (QLD) Pty Ltd – both of which are managed by our CEO and supported by a national management team. The state-based business units are managed by the respective construction managers.

While CIP Consolidated Pty Ltd provides corporate support – our supply chain is managed by CIP Construction Pty Ltd and CIP Constructions Group (QLD) Pty Ltd. CIP Residential Pty Ltd is an entity that is not currently operating.



Our Supply Chain

CIP Constructions operates as the head contractor on all projects. We partner with a large number of Australian-based service providers, suppliers, and subcontractors to deliver goods and services to and for our projects.

Our supply relationships are direct with our business partners, and we do not procure from any overseas countries. Our procurement for project delivery - through our supply network – accounts for approximately 80% of our purchasing activity.

Works completed by subcontract companies are primarily delivered on a 'supply and install' basis, whilst services provided by suppliers and consultants are on a 'supply-only' basis. The balance of our procurement activity centres around overhead and management costs for state and site office requirements.

The majority of goods and services for our project and business operations are sourced from within Australia. However, some goods – which are provided by subcontractors on a 'supply and install' basis - are known to be sourced from other countries including: China, Vietnam, USA and the European Union.

Such products include:

- Steel products,
- Facade Systems (e.g. aluminium-framed and glazed-façade systems),
- Glazing and tiling,
- Vertical transport services,
- Solar panels,
- Specialist electrical services componentry.
- Metal fibres used in reinforced concrete

Our review of information collated about our supply partners in this past year, supports our assessment that the overall risk of Modern Slavery within our business operations is low.

Procurement for project delivery through our supplier and subcontract network equates to approximately 95% of our purchasing activity, with the remaining 5% relating to consumables used in our State and project offices.

Managing the Risk

Assessing the Risk

To determine the scope of risk across our supply chain, we use the following evaluation criteria:

- *Sector/industry*
Informal or unregulated; have little visibility over lower tier suppliers; have high levels of seasonal work; have low pay.
- *Product/Service*
Where the product is manufactured in industries known to have low rates of pay and high rates of manual labouring.
- *Geographic Risk*
The product is manufactured in countries engaged in or under threat of conflict; which have poor democratic governance and weak rules of law.
- *Supply Chain Model*
Supply is through companies that have complex supply chains that are difficult to monitor; companies who use subcontractor or labour hire; entities with a history of non-compliance and which are poorly managed / have inefficient procurement and sourcing processes.
- *Spend Value*
The value of annual spend by CIP across the entities of CIP Constructions Group (QLD) Pty Ltd and CIP Constructions Group Pty Ltd and the change in spend value year to year.

To assess risk, we reviewed our supply chain by:

- determining key products supplied (e.g. steel, concrete, glazing, metal products, solar panels, vertical transport, HVAC and metal fibres).
- identifying the business partners who supplied the service and/or product.
- reviewing the value of spend against the above suppliers.
- identifying the number of new partners onboarded during the year and whether they posed any risk to the businesses.

Once collated and evaluated against the five risk criteria, we identified the following:

- A **9.19% increase** in spend value across both entities. QLD entity gained 34.83% in expenditure whilst the other States increased slightly by 0.31%. The increase in expenditure in QLD was primarily due to the new Bunnings store at Oxley in Brisbane that CIP Constructions were contracted to build. NSW also increased its turnover whilst there has been a decline of similar proportion in VIC. South Australia has remained constant whilst there has been a slight decline in turnover in WA.
- A further **10.16 increase** in the number of subcontractor companies who had not previously worked with CIP.
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- A 2.17% decrease in procurement of products from outside of Australia.

The Companies who have provided imported products have been reviewed and have found to have sourced their products ethically.

Assessed levels of risk in our supply chain was:

- **88.71% Low Risk.**
Primarily produced in Australia or from Countries that have a low risk of modern slavery.
- **10.26% Medium Risk**
Assigned on the basis that they may procure goods from overseas countries with documented sector/industry or geographic risks.
- **1.03% High Risk**
Assigned on the basis that they are widely known to use high levels of contract labour in both production and installation.

Note: We have no reason to believe that any of the above noted as High or Medium risk have engaged in any modern slavery activities.

We acknowledge that risks, beyond our knowledge may arise in the way that products are produced or procured.

While our supply chain is based in Australia, we acknowledge that other risks may arise in the way that products are procured from direct subcontractors and suppliers which use other countries for production and supply.

Actions Taken

The key activities that we have completed in this reporting period are:

- *Supply Chain Mapping*
We have reviewed all our suppliers (suppliers, subcontractors, and service providers).to ascertain where their products have been manufactured. Ie. Supplier mapping by geographical location to identify all suppliers, including those providing goods, services, and raw materials, and understand their operations.
- *Spend Value* our supply chain.
- *Ethical / Responsible sourcing.*
- We have obtained ethical sourcing / responsible sourcing evidence including Modern Slavery statements and policies from new Subcontractors / suppliers being introduced to CIP Constructions, as well as continuing to monitor our existing subcontractors & suppliers
- We have prequalified all new Subcontractors and suppliers working on our projects, including mandatory signing of Statutory Declarations pertinent to Modern Slavery for monthly invoice processing. We review the prequalification documentation and tender interview our Subcontractors which includes a section on Modern Slavery etc, prior to their engagement.

Actions for the Next Period

Key actions that we have identified for the next reporting period include:

- *Risk Evaluation*
More focus on where our supply chain obtains its products and under what circumstances they are produced. This may include visiting overseas facilities such as overseas manufacturing facilities.
- *Awareness Training*
Awareness and application training to be developed for positions which directly interact with suppliers and subcontractors.
- *Client Discussions*
Ongoing identification of opportunities with our clients to strengthen the use of Australian-made products to support local industry including engagement of Indigenous trades and reduce Modern Slavery Risks.

- Promote more engagement with Indigenous and local entities who manufacture products in Australia
- Audits. Carry out audits of Projects quarterly to ensure that Subcontractors and suppliers have been engaged to CIP Constructions Procurement Protocols pertinent to Modern slavery, which include prequalification's, tender interviews, subcontracts / Supply agreements and payment statutory declarations.

Assessing Effectiveness

Our monitoring process is continuing to develop and implement additional key performance indicators, such as:

- Completing quarterly risk evaluation against our suppliers/Subcontractors, that enter our supply chain, and reviewing our existing supply chain including tender interviews that cover the topics of Modern Slavery, anti-corruption, anti-money-laundering and terrorism finance and the like, and ethical sourcing of local and overseas products Roll out additional Modern slavery awareness training to all Procurement staff and site teams who are engaging Subcontractor and suppliers, as well as including awareness of the impacts of modern slavery as part of our onboarding procedure with new procurement staff.
- more focus on the smaller trades who are primarily labour-intensive companies who may periodically engage overseas casual or seasonal workforce or what.

Future Actions

CIP Constructions will continue to recognise that there are further actions that can be implemented to assess and address the risk of modern slavery in our business and supply chain.

In FY 2025-2026, we will be focusing on:

- Improving the way, we ascertain, and which companies and products are more likely to be exposed to the risks of modern slavery including forced and bonded labour and the like.

- Improving our supply network to open up new sources and improve our database including the engagement of indigenous entities and local manufacturers to reduce the reliance on overseas supply markets.
- Make our greater staff and not only our Procurement teams of the risks associated with modern slavery.
- Engaging subcontractors & suppliers who demonstrate a genuine commitment to addressing modern slavery, and who are willing to partner with CIP Constructions on the journey of improving workforce practices and supply chain management to reduce associated risks.
- Updating our Procedure for Modern slavery Reporting and Compliance to make it more pertinent to the current trends of modern slavery as well as enhancement to be more effective for the assessment of the risks associated with Modern Slavery.
- Establish a modern slavery due diligence system to prepare for update to Modern Slavery Act 2018 Compilation 2 amendment (Act No 42, 2024) in preparation for this being mandated.

Consultation

How we Consulted

During the reporting period that this Statement covers, and in the development of this Statement, we actively engaged and consulted with all companies that we own or control. During this engagement, we:

- Procurement staff including State contract Managers and Head of Commercial and Contracts fortnightly meetings where supply chain is discussed.
- State contract managers review and sign off Prequalification's forms on an ongoing basis prior to engagement of new Subcontractors, suppliers and labour hire Reviewed quarterly spend and product being sourced within our supply chain to ascertain highest risk with importation of structural steel and solar panels and electrical componentry pertinent to geographical risk
- Subcontract tender meetings where risk assessment done not only on capability but also adherence to regulatory and legislative requirements prior to awarding of package.

Statement of Approval

This statement is issued by CIP Consolidated Pty Ltd (ABN 30 643 593 533) and covers CIP Constructions Group Pty Ltd (ABN 51 643 698 930) and CIP Constructions Group (QLD) Pty Ltd (ABN 93 643 599 982), each being a “reporting entity” for the purposes of the Modern Slavery Act 2018 (Cth).

This statement has been prepared in accordance with the requirements of the Modern Slavery Act 2018 (Cth) and explains the actions taken by CIP to assess and address modern slavery risks in our operations and supply chain during the reporting period from 1 July 2024 to 30 June 2025.

This statement was approved by the Board of each of the reporting entities on 31 August 2025.



Mark Hendry

Chief Executive Officer