

MODERN SLAVERY STATEMENT 2025

This is Doval Constructions (Doval) Modern Slavery Statement, in accordance with the Modern Slavery Act 2018, this statement outlines the steps that Doval has taken, and is continuing to take, to assess and reduce risks of modern slavery within our business and our supply chain, and our plans for review and improvement for the 2025 financial Year.

This statement has been prepared and submitted by Doval Constructions (QLD) Ltd as a single reporting entity. This statement was reviewed and approved by the Directors of Doval Constructions (QLD) Ltd.

Organisation Structure, Operations and Supply Chains

Doval was incorporated in 1977 as a civil engineering company. For more than 40 years' Doval has provided a diverse range of civil and building construction services for Local, State and Commonwealth Government bodies as well as major corporate Clients within Queensland and New South Wales.

Doval specialises in the construction of medium-sized projects. Covering Civil engineering construction services of the following nature: construction of bridges, road works, paving, steel and concrete structures, commercial and industrial facilities, pipelines, water and wastewater infrastructure, excavation, deep excavation, bulk earthworks, drainage and drainage structures, back-flow devices.

Doval currently has approximately 100 employees and 40 items of heavy plant and equipment and approximately 30 subcontractors engaged on a required basis to deliver construction requirements.

Risk of Modern Slavery

The risk of modern slavery in Doval Constructions' operations is considered low. However, the diversity of products and services provided to Doval by subcontractors and suppliers can potentially expose the company to modern slavery risks in the supply chain, particularly at lower tiers, despite the majority of procurement being within Australia. The key risks include:

Operations Risks

- Engagement of labour hire or subcontracted workers on construction sites, where oversight may be limited
- Temporary or project-based workers operating under tight deadlines, increasing vulnerability to coercion or unfair treatment
- Specialist contractors providing services such as excavation, plant operation, or high-risk manual labour

Supply Chain Risks

- Procurement of construction materials such as steel, timber, concrete, and mechanical equipment, which may involve lower-tier suppliers overseas where labour protections are weaker
- Subcontracted services or suppliers located in regions or industries with higher incidences of forced labour or unethical employment practices
- Indirect supply chain risks through third-party suppliers of equipment, materials, or services

Entities Owned or Controlled

Doval Constructions (QLD) Ltd is the sole reporting entity, and no other entities are currently owned or controlled.

Doval is a reputable company with strong cultural values, demonstrated through systems and processes for locating, identifying, assessing, and managing subcontractors and suppliers. By identifying these risk areas, Doval actively monitors and mitigates potential modern slavery risks through robust procurement

processes, contractual obligations, and supplier engagement, which are communicated to all subcontractors and suppliers prior to appointment and/or the award of any subcontract works.

Procurement Processes and Assessing and Addressing Modern Slavery Risks, Including Due Diligence and Remediation Processes

Doval has an established procurement procedure to assess, address and mitigate modern slavery risks in its business and supply chain. These include:

Risk Identification and Assessment

- Identifying hazards associated with purchasing goods, services, and labour hire
- Conducting risk assessments to implement controls to reduce risks to as low as reasonably practicable

Subcontractor and Supplier Management

- The Subcontractor Management procedure sets out the process for onboarding and managing subcontractors and suppliers to ensure that externally provided processes, products, and services comply with legislative, client, and Doval requirements
- Requiring all subcontractors and suppliers to comply with Doval's Ethics Policy, safety, and environmental standards

Contracts and Due Diligence

- Subcontractors and suppliers requested to sign a statutory declarations (or equivalent) representing an additional commitment to work with Doval to eradicate slavery from their organisation and supply chain.
- Senior management works collaboratively with subcontractors and suppliers to ensure expectations and standards are understood, and potential exposure to human rights risks is minimised

Doval is committed to working with its suppliers to eradicate modern slavery from the company's supply chain. Over 99% of Doval's total procurement spend is within Australia. The due diligence process is initiated by a risk assessment of subcontractors and suppliers prior to contract award, documented in Doval's Approved Subcontractor and Supplier List.

Measuring the Effectiveness

Doval actively engages with its subcontractors and suppliers to determine whether they are compliant with our standards. If an area of concern is identified with a supplier, we proactively engage in positive dialogue in order to remedy any failure of our policies and Code of Conduct.

Doval monitors the effectiveness of its modern slavery measures through:

- **Audits and Reviews:** Periodic checks of the Approved Subcontractor and Supplier List and engagement with suppliers to address any non-compliance.
- **Supplier Compliance:** Monitoring adherence to contractual obligations relating to ethical business practices, human rights, safety, and environmental standards.
- **Training and Awareness:** Provide modern slavery and ethics training and awareness for staff and subcontractors.
- **Incident Monitoring:** Recording any policy breaches and implementing corrective actions to prevent recurrence.

These measures ensure Doval's procurement and supplier management processes are effective in mitigating modern slavery risks and continuously improving compliance across operations and supply chains.

Ethics Policy

This document outlines Doval's approach to establishing the essential standards of personal and corporate conduct and the behaviour expected of everyone who works for or with Doval including directors, employees, subcontractors, suppliers, and business partners.

Consultation

Doval has established an in-house Anti-Slavery Working Group consisting of the Directors and Project Managers. Developments and updates are discussed at monthly management meetings to ensure alignment and oversight across the business

Moving Forward

Doval has implemented processes and practices, including its extensive staged procurement process and contractual terms, to minimise potential modern slavery risks within its operations and first-tier suppliers. Moving forward, Doval will:

- Continue monitoring and improving procurement and supplier engagement processes
- Expand training and awareness programs for staff and subcontractors
- Conduct regular reviews of suppliers to strengthen due diligence and mitigate emerging risks

These steps form part of an ongoing modern slavery roadmap to identify and address potential risks within the business and supply chain.

Approval

This Modern Slavery Statement was approved by Stephen Beck on 20 February 2026, as Director and in his capacity as the principal governing body of Doval Constructions (QLD) Ltd.



Signed: Stephen Beck, Director