

APOLLO

MODERN SLAVERY STATEMENT 2024

July 2023 – June 2024

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Apollo Property Group Modern Slavery Statement FY 2024

This Statement is submitted on behalf of Apollo Property Group Pty Ltd (ABN 30 151 819 895) (**Apollo**) under section 13 of the *Modern Slavery Act 2018* (Cth) (**MSA**) to cover the reporting period of 1 July 2023 to 30 June 2024.

Apollo met the reporting threshold under the MSA for the first time in May 2024, one month before the cessation of the reporting period. Apollo has been advised that the MSA is strict in that it requires a statement to be provided for a reporting period, regardless of whether the threshold is met at the beginning of the reporting period or at the very end. As such, this is Apollo's first ever Modern Slavery statement and it has had very little time to take any action in this space. Apollo has sought advice from external modern slavery experts in order to progress its journey in this space.

1 Identification, Structure, Operations and Supply Chain (MSA ss16(1)(a), 16(1)(b))

1.1 Structure

Apollo is 100% owned by corporate trustee LCB Holdings Pty Ltd (**LCB**) for the LCB Investment Trust. LCB also wholly owns Apollo Group Services Pty Ltd and LCB Enterprises Pty Ltd. Apollo Group Services Pty Ltd is the employing entity of all Apollo staff. LCB Enterprises Pty Ltd is an investment and holding— it does not trade or have any employees. These entities do not meet the MSA reporting threshold. Apollo itself does not own or control any entities.

1.2 Operations

Apollo is a privately owned proprietary limited company working in construction. Founded in 2008 in Queensland, Apollo is driven to become the most respected tier 2 builder in Australia while fostering a “People First” culture. Apollo conducts projects in the space of defence, childcare, health, offices, hospitality, hotels & tourism, education, retail, industrial, sports and leisure.

Apollo has offices in Brisbane, the Gold Coast and Townsville and has worked on sites throughout Queensland including in Brisbane, Stradbroke Island, Townsville, Redcliffe, the Wide Bay and Burnett Region, Warwick and more. Apollo, in the reporting period, had 78 permanent employees, with no casual staff or independent contractors and no employees working in an arrangement where their visa ties them to Apollo. The only investments Apollo holds are term deposits which are used as security for bank guarantees.

1.3 Supply chain

We generally contract with the majority of suppliers under short to long-term agreements, depending on the nature of the goods or services provided. Contract durations vary, with subcontracts typically aligned to the specific scope and timeframe of each project, which may be as short as six weeks for fit-out or extend over the life of larger projects. Consultancy agreements are also established for specialised professional services, while longer-term arrangements are generally reserved for strategic service agreements, such as with our Managed IT provider, software-as-a-service platforms, and other key partners. We subcontract works across a range of trade areas, including structural, electrical, mechanical, hydraulic and finishing trades. We also engage labour hire, waste management and traffic control providers under relevant supply or service agreements to support project delivery. All supplier and subcontractor engagements are managed through Apollo's ISO-certified Integrated Management System, which embeds structured procurement, contract management and compliance processes.

During our first reporting period Apollo engaged with 851 tier 1 suppliers, being those suppliers we directly contract with. These included suppliers of a range of goods and services including:

- raw materials such as steel, timber, asphalt, glass, aluminium and concrete;
- hire and purchase of fencing, barriers, formwork, scaffolding, tools, equipment and machinery;
- consumable items such as bottled water, catering, etc;
- furniture, information and technology software and hardware;
- construction based services including: construction subcontracting, engineering services, architects, landscaping, asbestos removal, demolition experts, soil testing, surveyors, bricklayers, plumbers, electricians, cabinet makers, painters, carpenters, craneage, earthworks, building certifiers, acoustics consultants, air conditioner contractors, air quality specialists, environmental consultants and animal care, construction cleaning services, fire safety services and emergency management, marketing signage and printing services, traffic control, freight and transport services, pest control, waste and recycling services, and health and safety services;
- General business services including information and technology services, accounting, alarms and security services, cleaning services, recruitment services and labour hire.

In the reporting period, all of Apollo's suppliers were located in Australia. We acknowledge that our supply chain extends past our tier 1 suppliers and intend to gain further knowledge as to tier 2 and beyond in future reporting periods.

2 Risks of Modern Slavery (MSA s16(1)(c))

We understand that due to the nature and prevalence of modern slavery in the world every entity has risks of modern slavery within its operations and supply chains. Apollo has commenced a journey of examining the likelihood of risks that we could cause, contribute to, or be directly linked to modern slavery practices so that we can then take actions to address any potential risks.

2.1 Operational risks

We have been increasing our knowledge and understanding of modern slavery risks. We are aware that the construction sector has an estimated 18% of the world's modern slavery victims and hosts many victims of forced labour. We understand that some of the reasons behind construction being a high-risk industry include:

- by nature it is a project based industry, this means contracts with clients are temporary in nature resulting in the associated workforces being more vulnerable to redundancies and therefore at higher risk of exploitation;
- it is a very cost-driven sector and monetary pressures can lead to wage cuts, forced overtime and other cost-saving measures;
- its heavy reliance on subcontracted work (including out-sourcing overseas) reduces oversight of labour risks and increases the complexity of operations;
- the workforce is often located across many different sites that change year to year making sufficient supervision of conditions a more laborious task;
- reliance on manual labour which according to statistics is commonly undertaken by more vulnerable workers such as workers on visas, workers on more transient employment arrangements and in certain instances low skilled workers;
- construction supply chains include the manufacture and production of raw materials and building materials both of which are known to be associated with poor working conditions and forced labour.

Without acknowledging these risks inherent in our industry, we cannot properly take part in efforts to combat modern slavery.

Fortunately, Apollo has a relatively small workforce with under 100 staff meaning oversight of our staff working conditions is more attainable. All of our staff are on permanent contracts meaning we do not have a workforce with multiple levels of vulnerability; for example we did not have any workers on a visa, nor did we hire any independent contractors in the relevant reporting period. We have detailed below the actions we take to address risks in our supply chain and with our subcontractors.

We also acknowledge that we utilise recruitment services and labour hire firms. We understand that this has been generally associated with higher risks of practices like debt bondage due to the reduced oversight entities have over their staffing, employment contracts and employment conditions when utilising recruiters.

2.2 Supplier Risks

We understand construction supply chains often contain a number of high-risk goods and services. Like any entity, Apollo can contribute to or be directly linked to modern slavery practices through our own supply chains. Every entity risks contracting with a supplier that is engaged in modern slavery practices if proper processes are not put in place. Entities must also be aware of conducting operations in a way that may facilitate or incentivise modern slavery, such as by placing unreasonable timing or budgetary pressures on suppliers – especially in construction where these pressures are inherent.

Of our tier 1 suppliers, all are located in Australia, which is a low-risk geographic location for modern slavery according to the Global Slavery Index 2023. Australia has a prevalence of 1.6 people per 1,000 living in conditions of modern slavery according to those estimates and has the lowest prevalence in Asia and the Pacific. Our government response to modern slavery is rated high and we understand that potential changes to our legislative framework are underway to further progress the government response. Despite this, Australia still imports approximately \$26 billion of products at risk of modern slavery and we understand that these practices do occur on our shores.

We acknowledge that we engage with the following categories of suppliers that are identified in the literature as posing a higher risk of modern slavery: recruitment agencies, raw materials, tools/equipment/machinery, furniture, information and technology hardware, subcontracted construction services, cleaning and security services. We are seeking expert assistance on mapping our supply chains in order to increase our understanding of any risks within same in future reporting periods.

3 Actions to Assess and Address Modern Slavery, Effectiveness (MSA ss16(1)(d), 16(1)(e))

Apollo takes steps to assess and address the risks of modern slavery occurring in our operations and supply chains. We have sought expert assistance to help us accurately identify risks and progress our approach to putting meaningful action in place in response to those risks.

3.1 Operational Actions

Our Values

Our existing culture as embedded in our values is one that we believe is conducive to addressing and assessing modern slavery risks – particularly our emphasis on our people. Our values include:

1. **Our People** – Apollo is a people business. We celebrate each other's individuality and treat everyone with respect. We give each other the benefit of the doubt and back each other as mates do.
2. **Attitude** – We are fiercely proud of our culture and values system built around: humility, hard work, honesty and integrity.
3. **The Apollo Way** – The backbone of our business is our common-sense operating systems. These are followed with religious discipline. They are our non-negotiables.
4. **Teamwork** – Collaboration is crucial to our success. We believe in supporting each other, our consultants, subcontractors, suppliers and clients. We don't tolerate egos period. There is no them or us in any of our interactions, rather we are all equal.
5. **Communication** – We're not click heads. We prefer face to face or phone contact over email. We continually ask questions of each other and our clients as we believe deeper personal connections drive success.

6. **Our Customer** – We recognise our customer always has a choice. We take pride in being viewed as a professional, trusted and transparent builder. The ultimate measure of success is the fair margin we are paid resulting in a business profit and repeat business.
7. **Fun** – Construction can be a tough working environment. Part of our DNA is to be able to laugh at or with ourselves because having a bloody good time is important to us.
8. **Urgency** – Our business has been built around speed of quality project delivery. This is possible because we have autonomous people that take responsibility, make decisions and take calculated risks.
9. **Sweat the Small Stuff** – We always challenge ourselves to do the best we can do. In the pursuit of excellence, the little things matter, and we strive to do more with less.
10. **Growth (Ancora Imparo)** – We are problem solvers not makers. We are curious about learning new possibilities and act to explore them. We respond to challenges, not shy away from them.

Policies and Processes

In relation to our own workforce, we are continually refining various processes and policies to further our efforts in addressing and assessing modern slavery in our operations including through our:

1. Modern Slavery, Ethical Business and Anti-Corruption Policy;
2. Code of Conduct Policy;
3. Work Health and Safety Policy;
4. Psychosocial Policy;
5. Equal Opportunity Policy;
6. Performance Management Policy;
7. Learning and Development Policy;
8. Environmental Policy;
9. Fitness for Work Policy;
10. Grievance Policy;
11. Attendance and Leave Policy;
12. Alcohol, Drug & Smoking Policy;
13. Disciplinary Policy;
14. Personal Information Policy;
15. Workplace Behaviour Policy;
16. Flexible Work Policy;
17. Recruitment Guidelines;
18. Risk Management Policy;
19. Information Security & IT Operating Policy;
20. Privacy Policy.

Modern Slavery Policy

Our Modern Slavery, Ethical Business and Anti-Corruption Policy was rolled out in 2022 and is applicable to all staff across Apollo. This policy is provided to all staff during onboarding and is readily available on the company intranet. It contains our commitment to ensure there is transparency in our operations and approach to tackling modern slavery. This policy contains a definition of modern slavery and refers to human rights generally. We reiterate to staff that they must not directly or indirectly engage with any form of modern slavery and that we have a zero-tolerance approach to these practices. We advise staff of their responsibility to prevent, detect and report on risks, how to raise concerns, how we ensure we protect those who report on issues and how we enforce the policy in the event of any breach. Reporting under this policy or queries and feedback we receive on it is one of the mechanisms we have in place for assessing the effectiveness of our approach.

Code of Conduct

Our Code of Conduct sets out the standards expected of our staff and provides a broad framework that underpins our culture. Staff have a responsibility to report any behaviour contrary to the policy. We also require our staff to ensure third parties comply with our policies. The code generally speaks to ethical dealings, honesty, openness, fairness, respect, quality work, punctuality, supporting other staff, meeting legal obligations, conflicts of interest and bribery. It also lists out actions that are considered serious misconduct. This document sits alongside our Modern Slavery, Ethical Business and Anti-Corruption Policy and generally speaks to creating a good culture of looking after our people to ensure our foundations are not supportive of any poor practices that could escalate into modern slavery over time.

Reporting Avenues

We acknowledge that the nature of modern slavery means victims are often unable to speak up, are silenced, unable to report or seek help. Since the cessation of the reporting period, we have drafted a whistleblower policy which we hope once finalised will provide safe relation-free reporting avenues and reduce the likelihood of any modern slavery risks escaping our attention. Once up and running, we will track reports made under this policy so that we can assess the effectiveness of it in capturing modern slavery risks. We are aware of the tension in tracking such reports and that a lack of reporting does not necessarily mean lack of risk but may be an indicator of lack of awareness or safety to report.

Health, Safety and Wellbeing

We encourage our staff to report incidents, near misses, potential hazards or any weakness that impact the health, safety and wellbeing of our workers. Apollo has an in-house Health, Safety Environment and Quality (**HESQ**) team that works closely with the Systems and Compliance team to uphold our safety, quality and environmental standards across all operations. HESQ advisors maintain a regular presence on site to provide guidance, conduct inspections and support project team in applying these standards in practice. This on-the-ground engagement, combined with broader compliance oversight, helps us monitor and continuously improve the effectiveness of our health and safety systems. We also maintain a dedicated internal intranet resource library which staff can access to stay updated on the latest safety bulletins from industry bodies such as Master Builders and Safe Work Australia.

We offer AccessEAP to our employees, a confidential and complimentary counselling service. Our partnership with MATES, a not-for-profit charity providing suicide prevention through community development programs helps us promotes mental health awareness. We have 11 MATES Connectors within Apollo and have training programs designed to equip our Connectors with the skills to recognise the signs when a teammate may be facing mental health challenges. We also have a range of social and community events to support and empower our employees, which include an Annual Social Program which aims to foster a positive and enjoyable workplace culture along with our Annual Awards which help us celebrate and recognise the achievements of our staff.

Our BuildX Program is a development and mentoring initiative that provides up and coming employees with maximised opportunities to learn and grow and our One-on-One Mentorship Program aims to provide each team member with a clear path for career growth and development. We have a Leader's Playbook Program which focuses on the skills and traits needed to become an impactful leader and allowing participants to gain the tools and strategies they need to lead with effectiveness. Our market leading policies provide parents with the time and flexibility they need to bond with their new child and adjust to parenthood, without sacrificing their financial security or career progression.

First Nations Australians

Apollo understands that first nations people in Australia live with the legacy of intergenerational experiences of conditions and practices which we today call modern slavery. In the reporting period, we invited traditional Custodian Derek Oram Sandy to perform our first Welcome to Country Ceremony at our Apollo annual event. The following week, we launched a campaign of welcoming staff to submit their interest to become a member of our Reconciliation Action Plan working group – with our Chief Executive Officer signing up to be part of this group. We are proud of our Reconciliation Action Plan (available on our website) leading our journey to build meaningful partnerships with Aboriginal and Torres Strait Islander peoples, fostering shared history understanding. The Apollo leadership team has a deep desire for the business to actively contribute to achieving reconciliation in Australia.

Licences and Accreditations

We hold the following licences and memberships:

- Queensland Building and Construction Commission Licenced Contractor – Open
- State of New South Wales Licenced Contractor
- Master Builders Queensland Member – supporting a profitable and sustainable building and construction industry
- National Association of Women in Construction Member – helping champion and empower women in the construction related industries
- MATES in Construction partner – aiding in suicide prevention through community development programs and by supporting workers on sites
- Green Building Council Australia Member – advocating for the sustainable transformation of the built environment

We are proud to be accredited with the highest and most stringent building and construction safety scheme in Australia, the OFSC. In addition to this, we have the following accreditation:

- ISO 45001 – Occupational Health and Safety Management Systems
- ISO 9001 – Quality Management Systems
- ISO 14001- Environmental Management Systems
- ISO 27001 – Information Security Management Systems
- OFSC – Australian Government Building and Construction Workplace Health and Safety Accreditation Scheme
- PQ3 Level 3 – Prequalification to undertake building projects for Queensland Government
- CM3 – Recognised Workplace Health and Safety Management System Certification
- ISN – Recognised WHSEQ and Management Systems pre-qualification and vetting platform for major companies.
- Smartek – compliance management
- Rapid Global – safety and compliance

Each of these licences and accreditations forces us to take steps to mitigate a great range of risks in our workplace to ensure our people are safe and looked after, and that we are diligent regarding the suppliers and subcontractors that we work with.

Supporting Vulnerable Communities

We have also created a comprehensive Corporate Social Responsibility program that guides our commitment to ethical practices and social initiatives. Apollo is committed to making a meaningful difference by actively supporting initiatives across different sectors and we partner with a range of charities. These initiatives provide support for vulnerable members in the communities we live and work in. We know that those living with vulnerabilities are at an increased risk of being exploited through modern slavery practices.

3.2 Supply Chain Actions

We have undertaken the important task of collating our supply chain map based on modern slavery risks related to geographic location and category of goods/services for this reporting period. This has enabled us to identify above where our higher risk suppliers might be.

We have worked with external modern slavery experts to create a suite of precedent modern slavery clauses which have been inserted into all contract precedents. These clauses define modern slavery and require a number of warranties from our contractors including that their conduct will not constitute modern slavery, that they will take all reasonable steps to ensure there is no modern slavery in their supply chains, that they will maintain their own policies and procedures to ensure compliance with modern slavery laws and that they will promptly notify us if they become aware that modern slavery is taking place. We also require contractors to assist us in our efforts by providing modern slavery information and assistance to us as requested. Finally, the clauses reiterate that adverse action cannot be taken against anyone disclosing information in good faith relating to modern slavery.

All supplier and subcontractor engagements are managed through Apollo's ISO-certified Integrated Management System (**IMS**), which embeds structured procurement, contract management and compliance processes. We have subcontractor and procurement vetting and selection processes within the IMS, including within our Health, Safety Environment and Quality Manual, Subcontractor and Supplier pre-award meetings and Trade Letting Approval processes.

Our contracts otherwise require our suppliers to comply with all applicable Australian laws and workplace health and safety requirements. We also require that suppliers do not subcontract any work without our prior written approval and hold discretion to refuse to provide this. This enables us to maintain oversight and keep our suppliers and subcontractors accountable to our standards.

We are discussing with external experts what steps we can take to strengthen our subcontractor and supplier onboarding and monitoring processes to highlight modern slavery risk areas.

4 **Consultation (MSA s16(1)(f))**

Apollo does not own or control any other entities, so no internal consultation was required for this statement. Key stakeholders were involved in the preparation of this statement and consultation with external modern slavery experts also occurred.

5 **From Our Principal Governing Body**

Apollo makes this Statement in accordance with section 13 of the *Modern Slavery Act 2018* (Cth). Apollo's Board of Directors is the principal governing body for the purpose of the MSA.

This Modern Slavery Statement was considered and approved of by the Board of Apollo.



Leon Bowes
Chief Executive Officer and Chairperson of the Board
Responsible Member of Apollo's Principal Governing Body

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