

# MODERN SLAVERY STATEMENT FY25

RICHARD CROOKES  
CONSTRUCTIONS

2025



Richard Crookes Constructions acknowledges the Traditional Custodians of the lands and waterways we operate on.

In paying our deepest respect to Elders past and present, we recognise their enduring connection to Country and realise the lands on which we build have always been places of innovation and knowledge-sharing.

We honour the rich traditions of First Nations people and commit to learning from and working with Indigenous Communities to build a better tomorrow.



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# A MESSAGE FROM OUR MANAGING DIRECTOR

As the Managing Director of Richard Crookes Constructions (RCC) and a proud member of the Crookes family, I am committed to ensuring our business actively contributes to eliminating modern slavery across our operations and supply chain.

Over the last 50 years, RCC has proudly created places and initiatives that make a lasting and positive impact. Our commitment to building a better tomorrow is reflected in our culture and backed by leadership. Our approach to modern slavery is guided by the same principles that underpin our broader strategy: we work with integrity, we're transparent, we care, and we are accountable for our actions. These values shape the way we engage with our people, clients and partners and creates a more equitable workplace.

Addressing modern slavery is not only a legal obligation under the Commonwealth Modern Slavery Act 2018, but also a moral imperative that aligns with our values and social licence to operate.

This statement outlines the approach we take to identify, assess and mitigate modern slavery risks across our operations and supply chains. It reflects our ongoing efforts to build genuine supplier relationships, strengthen internal capabilities and collaborate with industry peers to drive systemic change.

Through collaboration, a shared commitment to higher standards, and a culture of impact, RCC is proudly building a legacy of positive change. This statement is not just a compliance document, it reflects our values and a roadmap for our continued journey toward a more equitable and responsible construction industry.



**Jamie Crookes**  
Managing Director – Richard Crookes Constructions



# OUR VALUES

## WE TAKE PRIDE IN OUR WORK

We strive to build remarkable places and strengthen communities by actively working to eliminate modern slavery and fostering relationships built on trust and dignity.

## WE DO WHAT WE SAY

Our people, clients, and partners help shape our success. What matters to them—human rights, fairness, and dignity—matters to us. We work alongside them to eliminate exploitation, and build a more sustainable and equitable future.

## WE VALUE PEOPLE

At RCC, no one is invisible. We build genuine relationships on a foundation of respect, ensuring every person in our workforce and supply chain is treated with dignity and free from exploitation.

## WE WORK SAFELY AS A TEAM

People are at the heart of our business. We collaborate across our business and supply chain to prevent exploitation and uphold human rights.

# ABOUT THIS STATEMENT

Richard Crookes Constructions (RCC) has prepared this Modern Slavery Statement in line with the mandatory reporting criteria set out in the Modern Slavery Act 2018 (Cth). The reporting period covered by this statement is July 1 2024 – June 30 2025 and was approved by the RCC Board of Directors on 8th December 2025.

# REPORT STRUCTURE

This table shows how our Modern Slavery Statement aligns with the mandatory reporting criteria.

The 7 mandatory criteria covered in the statement:

MANDATORY CRITERIA	REPORT SECTION
01 Identify the reporting entity	Structure, operations and supply chain
02 Describe the structure, operations and supply chains of the reporting entity.	
03 Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Risk profile
04 Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Risk management
05 Describe how the reporting entity assesses the effectiveness of these actions.	Measuring effectiveness
06 Describe the process of consultation with any entities the reporting entity owns or controls.	Consultation
07 Provide any other relevant information.	Supporting documents

# OUR PROGRESS IN SUMMARY

Throughout FY25, we strengthened our approach to identifying, assessing and mitigating modern slavery risks across our operations and supply chain.

Our focus remained on embedding robust governance, enhancing supplier engagement and improving transparency in alignment with legislative requirements.

## KEY ACHIEVEMENTS

### SUPPLIER ENGAGEMENT

During the reporting period, we strengthened our approach to supplier engagement and due diligence. We implemented a central platform for supplier risk assessment and reporting, enabling greater transparency across our supply chain. The RCC supplier list was uploaded, and we initiated risk profiling for Level 2 suppliers with an annual spend exceeding \$1 million to identify potential vulnerabilities.

Supplier participation in modern slavery questionnaires increased significantly, with internal compliance audits

confirming 95% suppliers / subcontractors complete the questionnaire. To further enhance oversight, we developed a comprehensive questionnaire for our teams to use when conducting offshore audits on materials and products.

Looking ahead to FY26, our focus will include implementing a structured schedule of inspections at international prefabricated material facilities and factories to check that they uphold responsible labour practices and meet our ethical standards.

### GOVERNANCE AND ACCOUNTABILITY



Strong governance underpins our approach to managing modern slavery risks. The ESG team leads the RCC modern slavery response and has assumed ownership of the central software platform, enabling consistent oversight, data integrity, and alignment with our reporting obligations.

To embed accountability across our operations, we have integrated modern slavery compliance requirements into procurement processes and contract templates, making adherence to ethical labour standards a core condition of doing business with us. This governance framework ensures that modern slavery risk management remains a strategic priority and is monitored at various stages of our supply chain engagement.

The ESG team has expanded to include of Social Sustainability Manager, who is tasked with governing and improving modern slavery initiatives across the business and our supply chain.

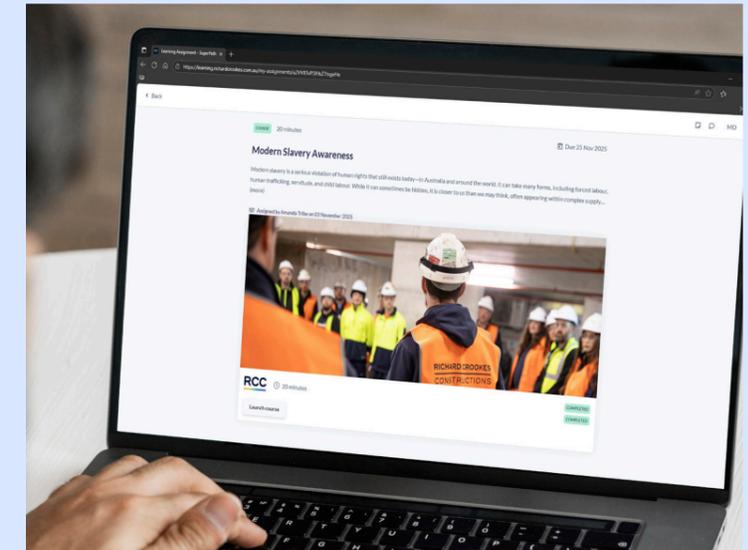


### TRAINING AND AWARENESS

We continued to embed modern slavery awareness across our workforce through targeted training and communication initiatives.

613 staff members completed Modern Slavery Training to strengthen their ability to identify and manage modern slavery risks within our operations and supply chain.

Our site induction pack was updated to include clear guidance on modern slavery reporting mechanisms, to help new team members and subcontractors understand their responsibilities from day one. To reinforce these messages on-site, we displayed awareness posters in site offices, highlighting key indicators of modern slavery and providing information on how to report concerns confidentially. These initiatives form part of our ongoing commitment to fostering a culture of awareness and accountability.



### REMEDATION AND CONTINUOUS IMPROVEMENT

We recognise that effective risk management requires clear pathways for action when issues arise. During the reporting period, we established formal escalation pathways for identified risks and potential incidents,

to facilitate timely and appropriate responses. These pathways include defined roles, responsibilities, and reporting mechanisms to address concerns swiftly and transparently.

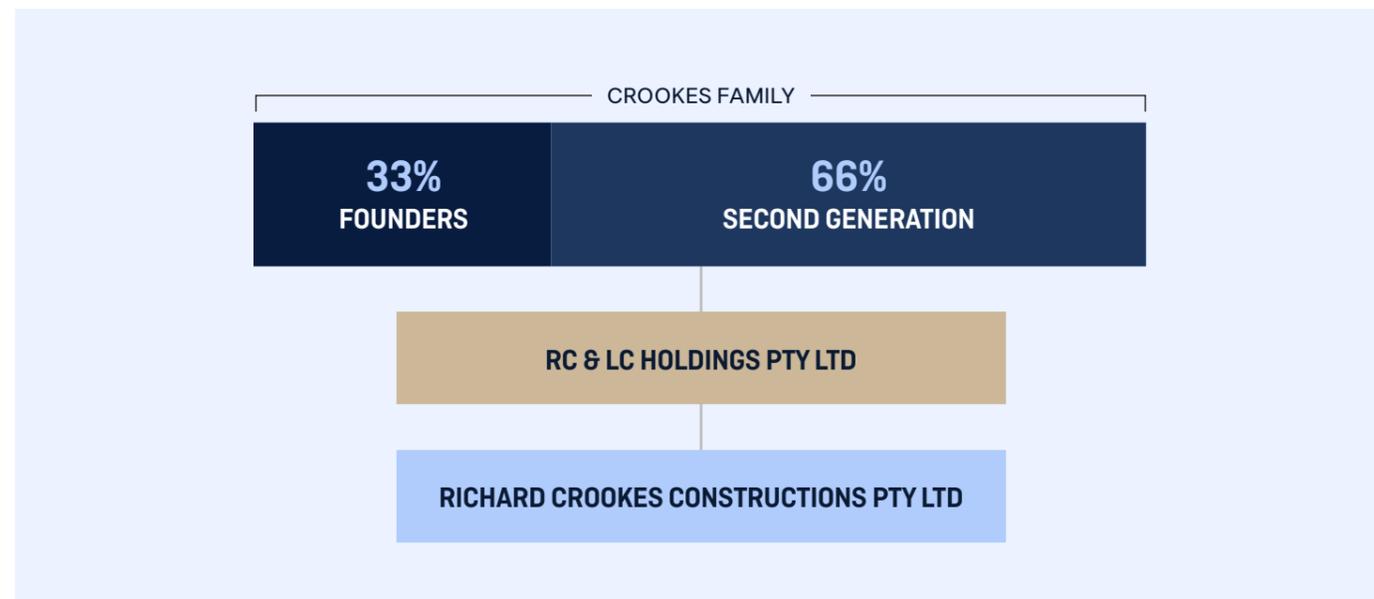
# STRUCTURE, OPERATIONS AND SUPPLY CHAINS

RCC is an independent, Australian-owned construction management business with a proud history dating back to 1976.

Our construction activities extend across a diverse range of sectors, including health, education, commercial, defence, community, and industrial.

We deliver projects through a variety of procurement methods such as Early Contractor Involvement, Design and Construct and Managing Contractor. Our projects range in value from \$10 million to \$600 million and are delivered for government, corporate and private clients.

## RCC GOVERNANCE STRUCTURE



RCC directly employs around 800 people across various roles such as Construction Managers, Project Managers, Estimators, Bid Managers, Design Managers, Contract Managers, Safety Managers and Construction Workers. Our workforce is supported by specialists in legal, finance, quality, safety, ESG, risk and compliance, information technology and people and culture.

As a construction management business focused on the design and delivery of projects, we engage a significant number of subcontractors, suppliers, consultants, and other service providers (supply chain partners) to

deliver the physical works required for our projects. RCC procures, directly and indirectly, a wide range of goods and services from these supply partners, with most of the work occurring on our construction sites.

We recognise that our supply chain extends well beyond on-site activities to include the manufacture and supply of materials and products off-site, some of which originate overseas. This complexity creates inherent challenges in identifying and managing modern slavery risks across multiple tiers of suppliers.

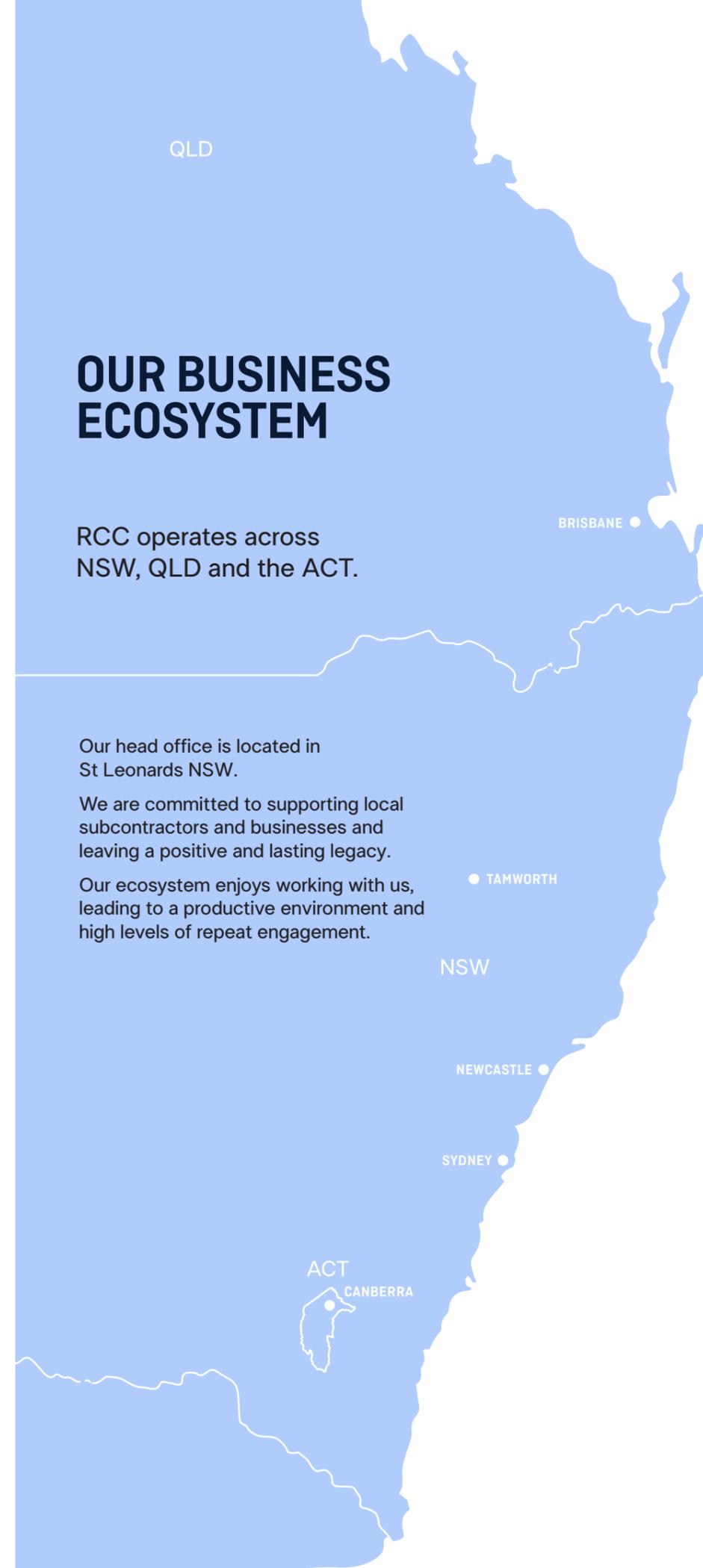
## OUR BUSINESS ECOSYSTEM

RCC operates across NSW, QLD and the ACT.

Our head office is located in St Leonards NSW.

We are committed to supporting local subcontractors and businesses and leaving a positive and lasting legacy.

Our ecosystem enjoys working with us, leading to a productive environment and high levels of repeat engagement.



**800**

direct employees

**40+**

project sites

**5**

corporate offices

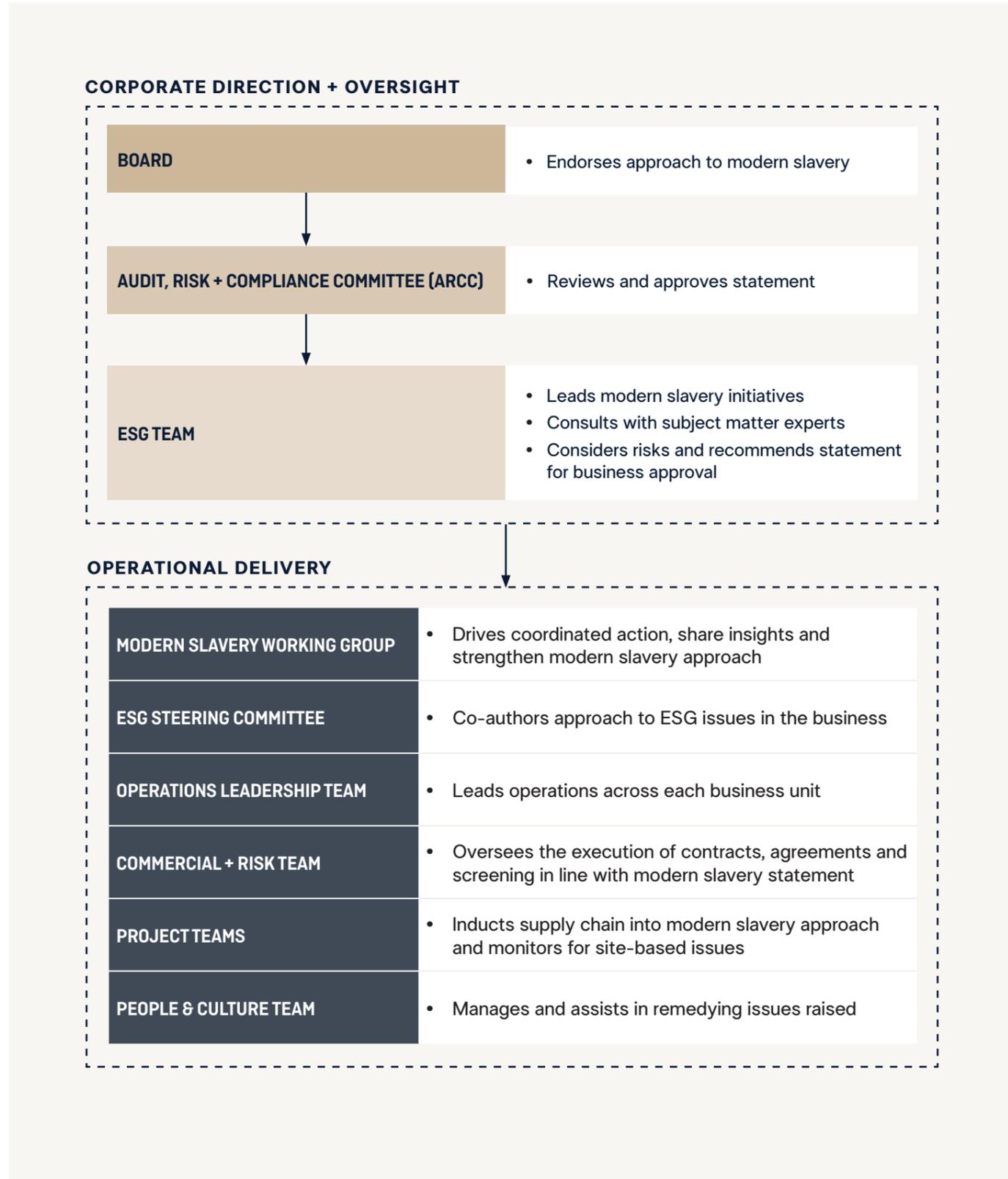
**3,500**

supply chain partners

**200**

consultants

# MODERN SLAVERY RISK GOVERNANCE



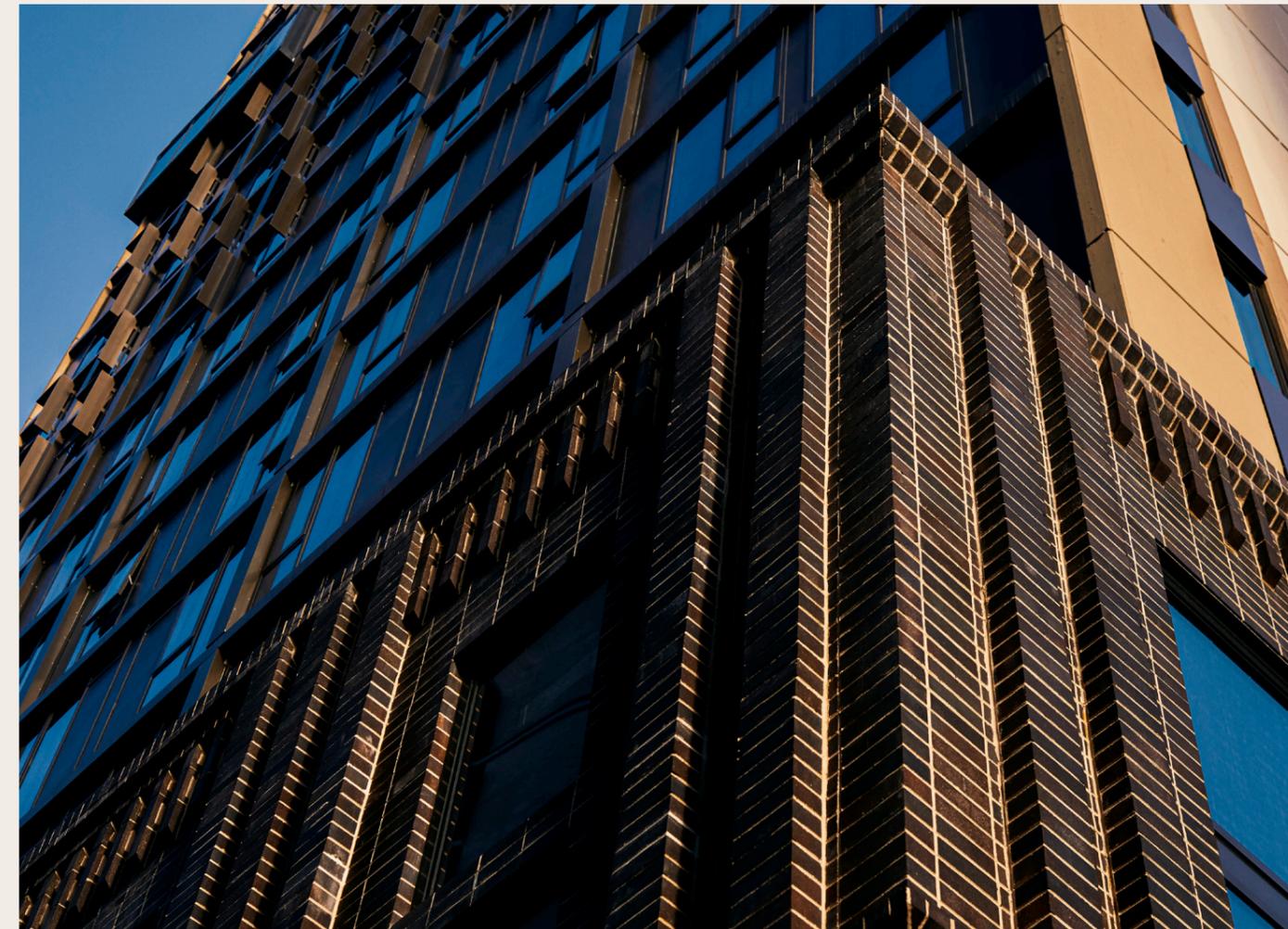
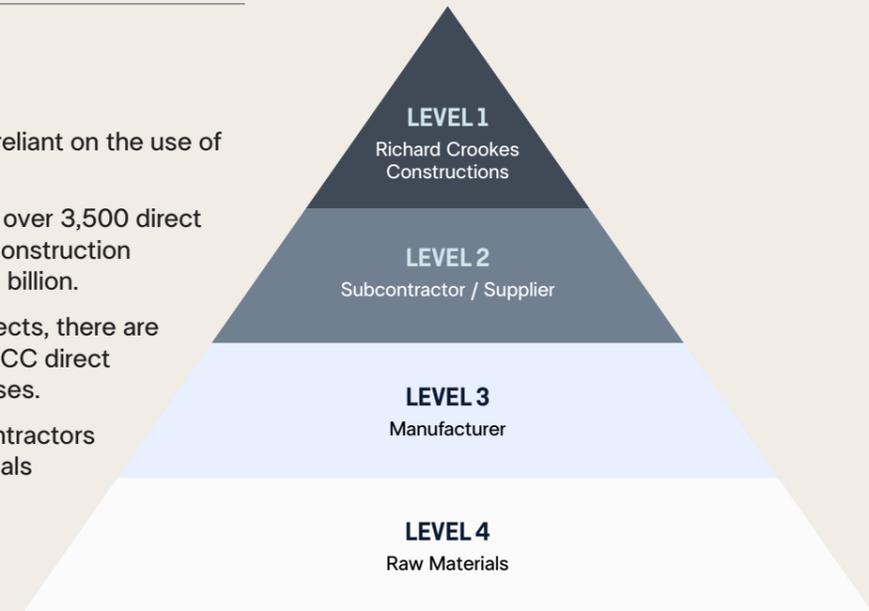
# SUPPLY CHAIN

RCC's business and procurement model is reliant on the use of subcontractors and suppliers.

During the FY25 reporting period, RCC had over 3,500 direct subcontractors / suppliers engaged on its construction projects, with an annual spend of circa \$1.5 billion.

On any given day, across RCC's active projects, there are approximately 3000 workers on site, 800 RCC direct employees and 380 subcontractor businesses.

RCC engages with Australian based subcontractors and suppliers, many of whom source materials from overseas, namely China, Malaysia, Thailand, Vietnam and Europe (Italy, Turkey, Spain, France and Germany).



# RISK PROFILE

As a construction company operating in Australia, we recognise that modern slavery can occur in various forms, including forced labour, debt bondage and exploitation of vulnerable workers.

While we maintain strong governance and compliance frameworks, certain characteristics of our industry and supply chains present inherent risks.



## OPERATIONAL RISKS



### LABOUR HIRE & SUBCONTRACTING

Our projects often involve multiple tiers of subcontractors and labour hire agencies. This complexity can obscure visibility over employment practices, increasing the risk of exploitation such as underpayment, excessive working hours, or unsafe conditions.



### MIGRANT & TEMPORARY WORKERS

Construction relies on a diverse workforce, including migrant and temporary workers who may face language barriers, limited awareness of rights, and dependency on recruiters. These factors heighten vulnerability to coercion or deceptive recruitment practices.



### BUSINESS MODEL PRESSURES

Short project timelines, intense price competition and reliance on subcontracting or temporary hire.

## SUPPLY CHAIN RISKS



### RAW MATERIALS

Key materials such as steel, stone, and timber may originate from regions with documented forced labour practices, including bonded labour in brick kilns or state-imposed labour in certain jurisdictions.



### MANUFACTURED PRODUCTS

Fixtures, tiles, electrical components, and personal protective equipment (PPE) are often sourced globally. In some countries, weak labour enforcement and poor factory oversight increase the likelihood of exploitation.



### COMPLEX GLOBAL SUPPLY CHAINS

Our supply chains span multiple countries and involve numerous intermediaries, making it challenging to trace labour conditions beyond level 2 suppliers.

## SUPPLY CHAIN VISIBILITY

SUPPLY CHAIN	VISIBILITY	RISK PROFILE
Level 1 – Head Contractor	High	Low
Level 2 – Subcontractor / Supplier	Medium	Medium
Level 3 – Manufacturer	Medium	High
Level 4 – Raw Materials	Low	High

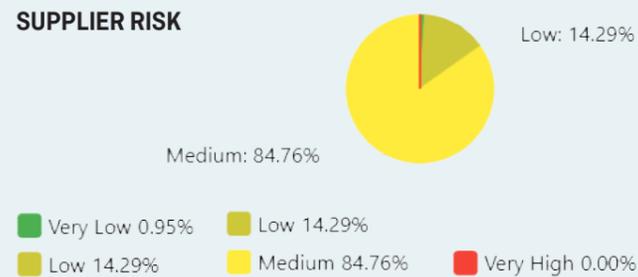
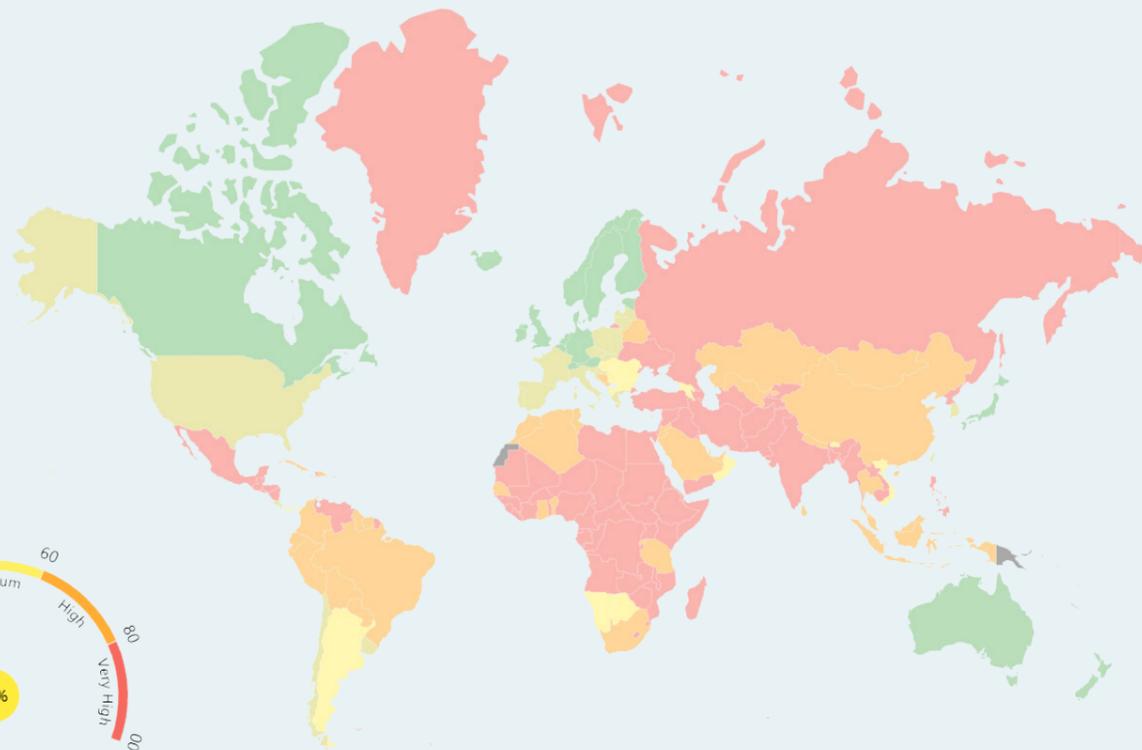
# SUPPLIER RISK PROFILING

During the reporting period we did business with around 3,500 Australian based suppliers and subcontractors with a total spend of around \$1.5 billion. Annual spend per supplier / subcontractor ranged from less than \$100 up to \$40 million.

Throughout the reporting period, we focused on risk profiling suppliers and subcontractors with an annual spend exceeding \$1 million, representing approximately 315 businesses or 9% of our total supplier and subcontractor base.

Each of these entities was categorised by country of operation and industry sector, then uploaded into the central software platform for systematic assessment.

Using these factors, suppliers were ranked according to their relative risk exposure, enabling us to prioritise engagement and due diligence activities with those operating in higher risk sectors. This targeted approach allows our resources to be directed where they can have the greatest impact in mitigating modern slavery risks.



Based on the assessment, the sectors in which we had high engagement have been listed, along with the risk indicator, potential risks and how RCC may be linked based on the continuum of involvement.

SECTOR / INDUSTRY	RISK INDICATOR	RISK DESCRIPTION	CONTINUUM OF INVOLVEMENT
<b>Mechanical &amp; Equipment</b>	Geographic	Labour rights and health and safety in overseas supply chains of parts, equipment and components and other manufactured goods including the production of metal products.  Common types of modern slavery include: <ul style="list-style-type: none"> <li>• Slavery</li> <li>• Forced labour</li> <li>• Debt bondage</li> <li>• Deceptive recruiting</li> </ul>	Directly linked
<b>Construction Materials</b>	Geographic	Labour rights, health and safety and human rights and governance in the overseas supply chain of building materials such as timber, plastic, glass, cement, metals, paint, textiles, ceramics, brick, sand, clay, stones, gravel, gypsum, brassware and iron.  Common types of modern slavery include: <ul style="list-style-type: none"> <li>• Slavery</li> <li>• Forced labour</li> <li>• Servitude</li> <li>• Debt bondage</li> <li>• Child labour</li> </ul>	Directly linked
<b>Electronics</b>	Sector & Industry	Labour rights and health and safety in electronics supply chains.  Common types of modern slavery include: <ul style="list-style-type: none"> <li>• Slavery</li> <li>• Forced labour</li> <li>• Servitude</li> <li>• Deceptive recruiting</li> </ul>	Directly linked
<b>Construction &amp; Engineering</b>	Sector & Industry	The construction and engineering sector faces increased risks of modern slavery risks due to its reliance on complex, multi-tiered supply chains, migrant and low skilled labour, and sourcing of materials from regions with poor labour protections.  Common types of modern slavery include: <ul style="list-style-type: none"> <li>• Slavery</li> <li>• Forced labour</li> <li>• Servitude</li> <li>• Debt bondage</li> <li>• Child labour</li> <li>• Deceptive recruiting</li> </ul>	Directly linked

# RISK MANAGEMENT

As a family-owned business and responsible corporate entity, we operate with integrity.

We have implemented several measures to evaluate and mitigate the risk of modern slavery within our business and supply chain:

- A policy which articulates RCCs commitment to prevent modern slavery within its operations and supply chains – Anti-slavery Policy.
- Communication of the Anti-slavery Policy to RCC employees and supply chain.
- Assessment of modern slavery and human trafficking risk within RCC and its supply chains and the development of effective, efficient and transparent controls to reduce exposure to those risks.
- Adoption of anti-slavery wording in contracts.

## ANTI-SLAVERY POLICY

RCC is committed to limiting the risk of modern slavery within its business, in its supply chain or through other business relationships. The anti-slavery policy applies to persons working for or on behalf of RCC in any capacity.

## MODERN SLAVERY REMEDIATION POLICY

This policy sits alongside our anti-slavery policy and outlines RCC expectations for managing suspected incidents of modern slavery, protecting and supporting those who may be victims.

## INDUSTRY ENGAGEMENT

RCC engages with specialist consultants and industry peers for an aligned approach to addressing modern slavery in the construction industry. This has included sessions with peers to address shared risk in operations.

- Undertaking due diligence on business partners, agents, contractors, consultants, sub-contractors and suppliers, coupled with the requirement that they implement procedures which incorporate the principles under the applicable modern slavery legislation.
- Training of RCC employees so that compliance with this policy is the duty of relevant employees at all levels and individuals can recognise modern slavery practices and take steps to avoid or report modern slavery as necessary.
- Collaboration with industry peers and stakeholders to address systemic issues.

## WHISTLEBLOWER POLICY

RCC's whistleblower policy outlines the businesses commitment to openness, integrity and accountability whilst ensuring compliance with current whistleblowing legislation. The policy sets out the circumstances in which a person can make a whistleblowing disclosure, the process RCC will follow when dealing with the disclosure and the protections that will apply to the whistleblower. RCC encourages the disclosure of information that suggests misconduct, breach of legislation or an improper situation.

## SUPPLY CHAIN MANAGEMENT

RCC has a supplier code of conduct that applies to third-party suppliers, employees of suppliers and contractors engaged to provide goods or services required through the supply chain. Suppliers must sign and agree to the code of conduct as part of the general conditions of the subcontract. It defines our expectations of suppliers, their subsidiaries and supply chain for compliance with the Code.

## SCREENING OF NEW SUPPLIERS AND SUBCONTRACTORS

New suppliers and subcontractors complete the RCC pre-qualification questionnaire. The pre-qualification questionnaire documents RCC's modern slavery requirements and analyses the suppliers understanding, implementation and risk profile for modern slavery management.

In addition, suppliers and subcontractors are contractually bound to RCC requirements, policies and relevant local laws when working with us.

## FAIRCALL REPORTING HOTLINE

The Faircall hotline is an independent service to report suspected unlawful and unacceptable conduct. The hotline is available to everyone that works with RCC. The details are available on the RCC intranet for RCC direct employees and on posters around site offices for RCC subcontractors and suppliers. Reports to the Faircall hotline can remain anonymous.

## WORKFORCE TRAINING

RCC continues to run a Modern Slavery Awareness Training which outlines both employee and business requirements for modern slavery in line with the Modern Slavery Act 2018 (Cth). It provides a definition, scope and indicators of modern slavery globally. It also shows how people can respond individually through responsible purchasing practices and supporting anti-slavery initiatives.

During the reporting period, we engaged a new Learning Management System with the focus for FY26 to develop a schedule of training initiatives which will support our commitment to Human Rights.

## MODERN SLAVERY SIGNAGE

RCC developed posters to display on our project sites "Modern slavery is closer than you think". The posters aim to increase awareness of modern slavery and encourage reporting by providing easy access to reporting mechanisms.



# MEASURING EFFECTIVENESS

RCC reviews key policies and procedures annually.

The Modern Slavery Working Group played a central role in measuring effectiveness and driving improvements throughout the reporting period. The group was responsible for key initiatives, monitoring progress and making decisions to improve RCC's modern slavery response across the business.

The ESG Committee aligns our approach with regulatory requirements, client expectations, and community standards.

This year, we aligned our Whistleblowing and Anti-slavery Policies to strengthen consistency and integrated these into our broader strategy, while also implementing a new Modern Slavery Remediation Policy.

RCC regularly monitors the effectiveness of our framework, policies, and processes for managing modern slavery risks through a range of activities:



## SUPPLIER INTERVIEWS

We have a process in place to conduct deep dives with selected suppliers and subcontractors to discuss their responses to our modern slavery questionnaire in greater detail if the questionnaire feedback identifies a higher level of risk

## AUDITS AND REVIEWS OF PROCESS IMPLEMENTATION

Our Commercial Compliance Manager performs project level audits to check that due diligence has been completed on subcontractors and suppliers, including completion of the Modern Slavery Questionnaire.

Ongoing desktop reviews of our construction procurement software, allows us to track successful completion of modern slavery questionnaires by new subcontractors and suppliers.

## FAIRCALL REPORTING HOTLINE

This year, we enhanced accessibility to the Faircall reporting hotline by including a QR code and modern slavery information in site inductions and on our intranet, making it easier for employees and supply chain partners to report concerns.

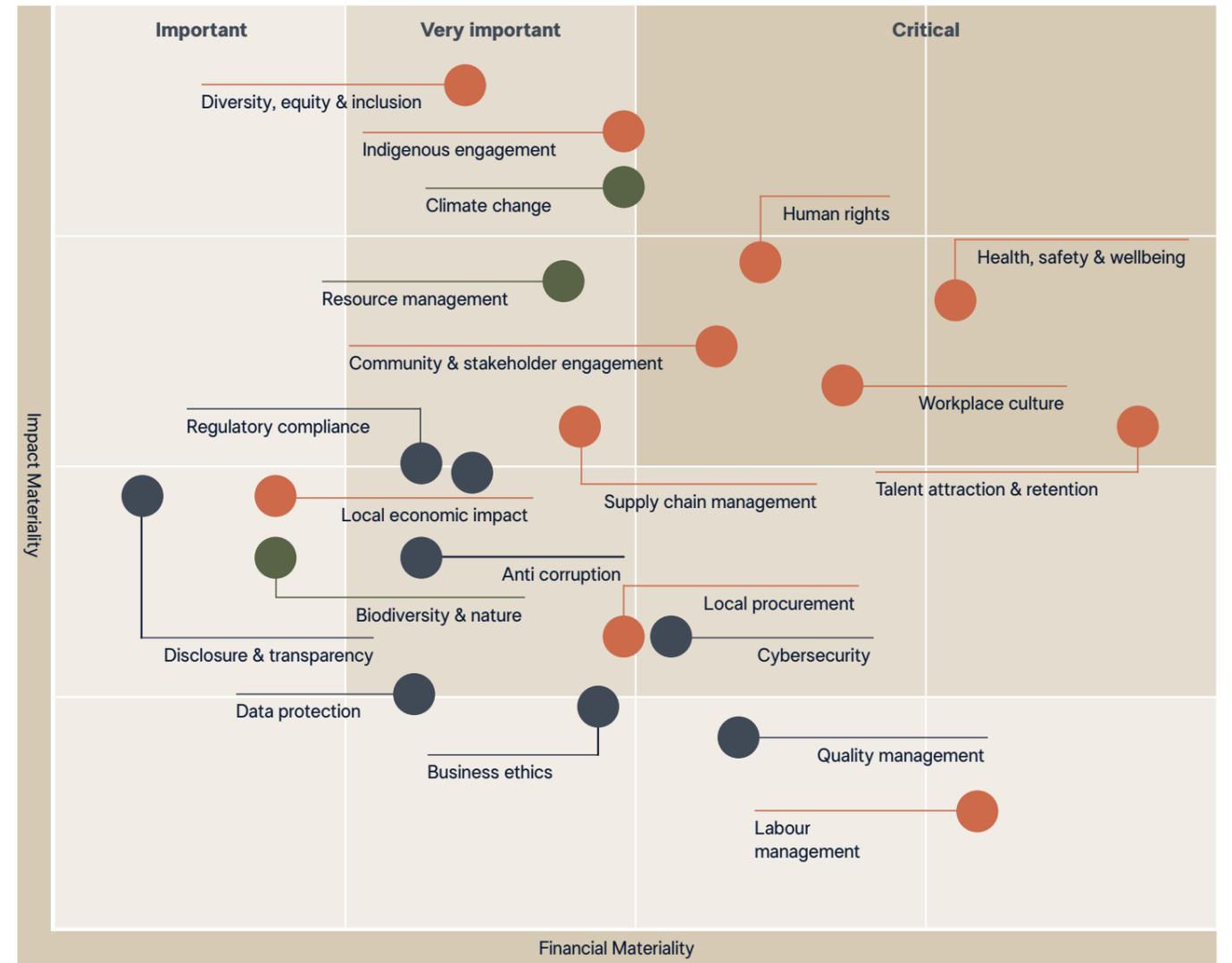
## MATERIALITY ASSESSMENT

As part of our ESG strategy development, we undertook a double materiality assessment. The assessment evaluated impact through two lenses.

- Impact materiality – the impact our business has on the environment and key stakeholders.
- Financial materiality – the impact external sustainability factors have on our financial health.

The materiality assessment shaped our strategic priorities, with human rights identified as one of the critical priorities for RCC and our stakeholders.

## MATERIALITY ASSESSMENT MATRIX



RCC is continually looking for ways to improve our processes and gain more visibility over the risk associated with our supply chain and operations. Our focus for FY26 is:

- Interviews with a representative sample of trades associated with high risk geographical, industry and sector areas
- Continue modern slavery training for new starters and refresher training for existing staff
- Implement a human rights policy to create a clear framework for respecting and promoting human rights across our operations and supply chains.
- Develop a schedule of planned inspections of international prefabricated material facilities and factories to check that they are acting responsibly. Findings will be reported as part of FY26 statement.

- Social
- Environment
- Governance

# CONSULTATION

As RCC is an Australian construction management business, it is the sole entity for the purpose of this reporting. RCC do not own or control any other entities.

The development of RCC's Modern Slavery Statement was prepared with the support of our Modern Slavery Working Group.

Members of Modern Slavery Working Group:

- Chief Financial Officer – Supplier information and risk advisory
- Commercial Compliance Manager – Supply chain engagement and audits
- Head of Corporate Affairs & ESG – ESG strategy
- People and Culture Director – People processes
- Social Sustainability Manager – Modern slavery advisory

The FY25 Modern Slavery Statement was presented to the Audit Risk and Compliance Committee on 2nd December 2025 for review and endorsement prior to board approval.

The RCC Board of Directors approved this statement on 8th of December 2025.



# SUPPORTING DOCUMENTS

Policies and documents that support our approach to identifying, remediating and combating modern slavery are tabled below.

POLICY	PURPOSE	LAST REVIEWED
<b>Anti-Slavery Policy</b>	Outlines RCC's stance on modern slavery and the legal requirements of everyone working for or on behalf of RCC.	March 2024
<b>Modern Slavery Remediation Policy</b>	Commitment to addressing identified instances of modern slavery promptly and effectively through a victim-centred approach.	November 2025
<b>Sustainability in Procurement</b>	Outlines the support and process in place to support supply chain integrity and human rights.	April 2024
<b>Whistleblowing Policy</b>	The Whistleblower Policy provides a way for eligible disclosers to raise concerns of malpractice they believe to be occurring at work, or in the context of the Company's operations.	October 2025
<b>Supplier Code of Conduct</b>	Sets out the required behaviours, processes and support all suppliers must have in place to work with RCC.	April 2024
<b>Anti-harassment, anti-bullying and anti-discrimination policy</b>	This policy describes the legal and commercial requirements to provide all employees with a work environment free from all forms of discrimination, bullying and harassment.	March 2024
<b>ESG Strategy</b>	Brings together existing and new initiatives and guides decisions that are in the best interest of people and the planet.	2025

# MODERN SLAVERY STATEMENT FY25

**RICHARD CROOKES**  
**CONSTRUCTIONS**

## CONTACT THE ESG TEAM FOR MORE INFORMATION

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