

McMAHON SERVICES GROUP
OF COMPANIES

**MODERN SLAVERY
STATEMENT
2025**



McMAHON
SERVICES

 **intract**

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INTRODUCTION

This statement has been prepared by McMahon Services Holdings Pty Ltd (ACN 096 928 497) and McMahon Services Australia Pty Ltd (ACN 097 072 565) to meet the requirements under the Modern Slavery Act 2018 (Cth) in relation to the financial year ending 30 June 2025. This is McMahon Services' sixth modern slavery statement.

All references to McMahon Services, our, we and us are, references McMahon Services Holdings Pty Ltd (ACN 096 928 497), McMahon Services Australia Pty Ltd (ACN 097 072 565) (being a wholly owned subsidiary of McMahon Services Holdings Pty Ltd) and also separately to Intract Australia Pty Ltd (ACN 097 072 565), as well as to any relevant related bodies corporate (as detailed herein), where applicable.

Consultation

This statement was updated from the previous statement by the Risk & Compliance Team, with input from our Tendering & Proposals Department.

Internal stakeholders across McMahon Services Holdings Pty Ltd, McMahon Services Australia Pty Ltd and Intract Australia Pty Ltd were approached to provide comment and input including senior management across each of the entities and senior personnel from shared services to ensure accuracy and relevance, together with senior personnel of relevant related bodies corporate.

Commitment

McMahon Services maintains a zero-tolerance approach to exploitative practices, including human trafficking, slavery, forced labour, child labour, and other slavery-like practices. We are committed to working collaboratively with our subcontractors and suppliers to ensure their operations align with our expectations regarding modern slavery prevention and the protection of human rights.

We actively seek to identify and assess risks of modern slavery within our operations and across our supply chain. Where risks are identified, we address them through appropriate remediation measures, training, effective contract management, and strong governance practices.

This statement has been approved by the Board of Directors of McMahon Services Holdings Pty Ltd and McMahon Services Australia Pty Ltd.



David McMahon

Managing Director of
McMahon Services Australia Pty Ltd

Managing Director of
McMahon Services Holdings Pty Ltd

Director of
Intract Australia Pty Ltd



Andrew McMahon

Director of
McMahon Services Australia Pty Ltd

Director of
McMahon Services Holdings Pty Ltd



John Briggs

CEO / Director of
Intract Australia Pty Ltd

OUR PEOPLE ARE CENTRAL TO WHAT WE DO.

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OPERATIONS

McMahon Services Holdings Pty Ltd

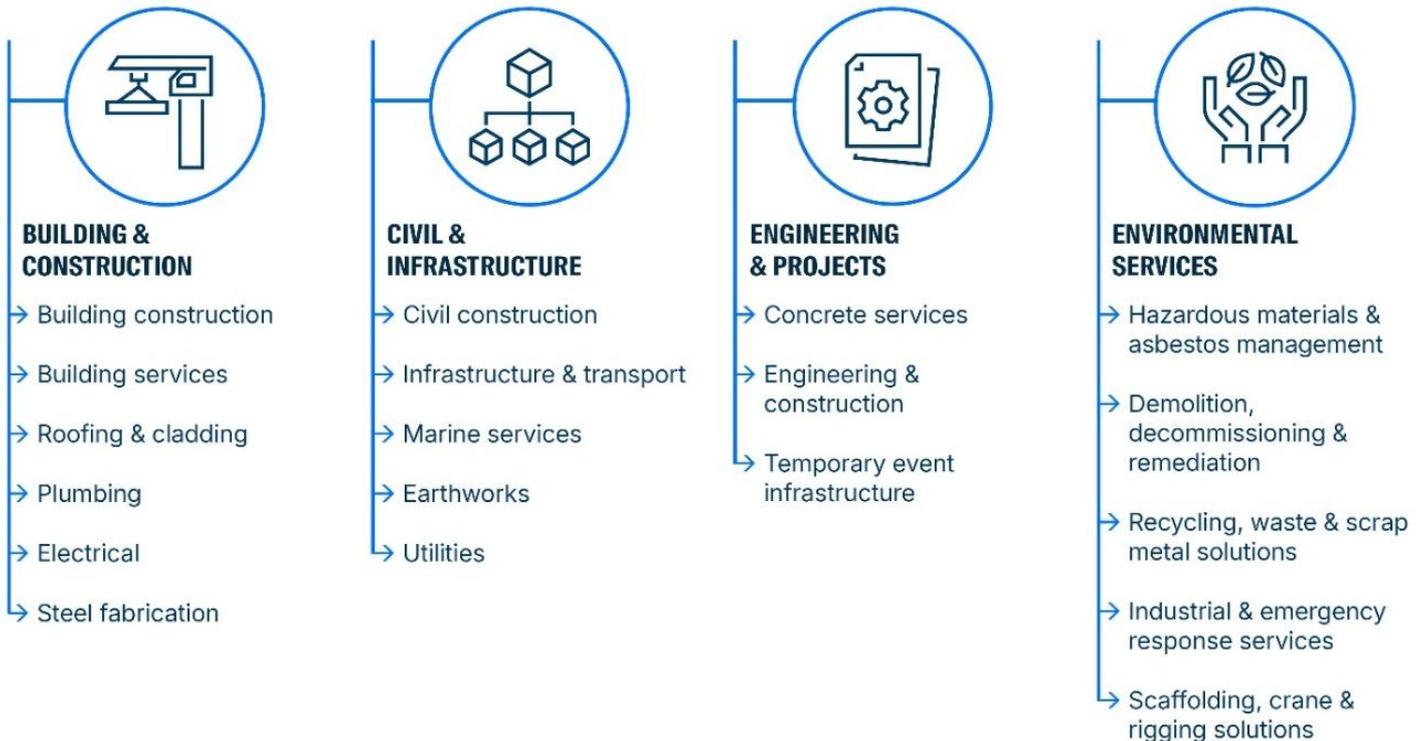
McMahon Services Holdings Pty Ltd is the parent company for McMahon Services Australia Pty Ltd (the main trading entity of McMahon Services) as well as McMahon Services Australia (NT) Pty Ltd (a separate NT company with a long and proud history of operating in the Territory) and McMahon Services New Zealand Ltd (a separate entity set up for operating within New Zealand). McMahon Services Holdings Pty Ltd is only a holding company and does not undertake any operations.

McMahon Services Australia Pty Ltd

McMahon Services Australia Pty Ltd is a leading privately owned Australian provider of environmental, infrastructure, building construction and services, operating across all states and territories. Founded in 1990 by brothers David and Andrew McMahon, the company has grown from an Adelaide-based business into a nationally recognised, award-winning contractor.

With 14 offices and workshops across Australia and New Zealand, McMahon Services employs more than 1,150 people delivering projects in metropolitan, regional, remote and challenging environments. We service local, state, national and international clients across the commercial, industrial, transport, utilities, resources, defence and government sectors, with a strong reputation for successfully delivering complex, high-risk projects.

Our experienced project and construction management teams deliver integrated, multi-tiered solutions across four core service lines.



McMahon Services Holdings Pty Ltd wholly owns McMahon Services Australia (NT) Pty Ltd (**MSA (NT)**), a customer-focused specialist service provider operating throughout the Northern Territory. MSA (NT) delivers a broad range of services, from demolition and asbestos removal to full turnkey construction and civil works, and also services regional areas of northern Western Australia and northern Queensland.

MSA (NT) employs more than 30 personnel, including licensed tradespeople, engineers and project delivery specialists, and is supported by an extensive network of specialised subcontractors. This capability enables the delivery of diverse services at short notice. Core services include emergency response management, contaminated material management, specialised demolition, building repairs and maintenance, regional and remote community services, and full civil and construction works.

MSA (NT) is a fully licensed builder and demolition contractor, holding all required asbestos, contaminated material transport, storage and construction licences. The business is accredited by Contractor Accreditation Limited (CAL) at the highest level for Northern Territory Government projects, holds Office of the Federal Safety Commissioner accreditation, and maintains certified ISO 9001:2015 management systems.

McMahon Services' in-house expertise is supported by a national fleet of plant, equipment, workshops and warehouses, enabling the majority of works to be self-performed. The business has invested significantly in new technologies and maintains a \$210 million plant and equipment fleet comprising more than 1,400 major items.



Through our multi-disciplinary, multi-tiered approach, we have successfully delivered thousands of complex and high-risk projects nationwide. Our portfolio ranges from high-volume, small-scale works to complex, multi-million-dollar projects delivered across dispersed geographic locations.

We build long-term, collaborative customer relationships, with more than half of our work undertaken for repeat clients across all sectors.



MAKE AN IMPACT. MAKE IT INTRACT.

Intract Australia Pty Ltd

Intract Australia Pty Ltd (**Intract**) provides civil construction, building construction, building maintenance, asbestos remediation and demolition services to clients across Australia. Established to create sustainable, long-term employment pathways for Indigenous Australians, Intract specialises in the delivery of projects in remote, regional and challenging environments.

Intract is Indigenous owned and operated and is one of the largest private sector employers of Indigenous personnel in Australia, with Indigenous employees comprising more than 90 per cent of its workforce across all areas of the business. Intract is a Certified Supplier with Supply Nation, Australia's Indigenous supplier diversity council, and holds a range of industry accreditations, including AusRoads National Prequalification R1, Achilles Oil and Gas accreditation, Contractor Accreditation Limited (CAL) Northern Territory accreditation, and Territory Proud Contractor status.

Intract is committed to supporting the objectives of the Australian Government's National Indigenous Reform Agreement and the Closing the Gap initiative, which seek to improve outcomes for Indigenous Australians across health, education and employment.

Intract was the first Indigenous-owned company in Australia to achieve certification under the Office of the Federal Safety Commissioner (OFSC) scheme. All projects operate under a single, integrated management system certified to the OFSC scheme, ISO 45001:2018 Occupational Health and Safety Management System, ISO 9001:2015 Quality Management System and ISO 14001:2015 Environmental Management System.

Intract's head office is located in Darwin, Northern Territory. The business co-locates a number of offices with McMahon Services, its 49 per cent shareholder, providing a national footprint with access to 14 offices across most Australian states and territories. This arrangement also provides access to a fleet of more than 1,400 major items of plant and equipment, enabling Intract to self-perform civil, building, asbestos remediation and demolition works.

SUPPLY CHAIN

As an Australian multidisciplinary services provider with strong emphasis on local procurement practices, our supply chain is diverse. Across the company, we encourage the engagement of local small to medium enterprises and the use of the locally manufactured products to maximise benefits to the Australian economy.

During the financial year ending 30 June 2025, goods and services procured included:

- Professional services, trades and specialist subcontractors
- Construction equipment and machinery
- Mobile fleet of heavy equipment and vehicles, including parts
- Raw construction materials
- Fuel and explosives
- Personal protective equipment and clothing
- Cleaning, security and catering services
- Electronics and minor electrical equipment
- Office equipment and stationery
- Energy and utilities
- Information technology services
- Labour hire

RISKS OF MODERN SLAVERY PRACTICES

Modern slavery refers to situations in which offenders use coercion, threats or deception to exploit individuals and restrict their freedom. Practices that constitute modern slavery include human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour.

We are committed to conducting our business ethically and transparently, avoiding modern slavery within our organisation and always upholding human rights. We are also committed to working with our suppliers and contractors to ensure that risks of modern slavery are appropriately identified and addressed, and that minimum standards relating to modern slavery compliance are met.

We have identified the following risks in relation to modern slavery practices:

1. that we may cause modern slavery practices within our workforce;
2. that we may contribute to modern slavery practices within our subcontractors; and
3. that may be directly linked to modern slavery practices within our supply chain.

Assessment of Risks

We are committed to reducing the risk of causing, contributing to or being directly linked to modern slavery practices. Accordingly, we have implemented the following measures across our organisation.

Due Diligence of Supply Chain

Our supply chain includes the procurement of materials and services required for day-to-day operations, including manufactured construction products and equipment, raw materials, uniforms and personal protective equipment, and office supplies. The risk of modern slavery is assessed as being highest within the lower tiers of our supply chain.

To mitigate these risks, we maintain a Subcontractor Pre-qualification Questionnaire that is used to assess all new subcontractors and suppliers to identify and address potential involvement in modern slavery practices. We continue to apply this screening process consistently and rigorously across our supply chain.

Contract Management

We enter into a wide range of contractual arrangements with suppliers and subcontractors across multiple industry sectors. These arrangements range from one-off purchase orders governed by standard terms and conditions to high-value, bespoke multi-year contracts and alliance agreements.

Our suite of template contracts includes specific modern slavery clauses designed to reduce the risk that we may cause, contribute to, or be directly linked to modern slavery practices. These clauses are reviewed and updated as part of our regular contract review process to ensure their ongoing effectiveness. Recent amendments to these clauses require subcontractors and suppliers to annually reconcile their supply chains against the United States Department of Labor List of Goods Produced by Child Labor or Forced Labor, undertake due diligence to identify associated risks, implement reasonable remediation measures, and notify McMahon Services in writing of any identified risks, together with a proposed remediation plan.

Our contracts also include provisions requiring subcontractors to certify compliance with all applicable statutory obligations, including the payment of lawful wages, and to adhere to our comprehensive safety management systems and standards. These requirements further mitigate the risk of contributing to modern slavery practices.

Compliance with our safety, regulatory and modern slavery contractual requirements is mandatory. We do not engage contractors who are unwilling to agree to these provisions, irrespective of cost considerations.

Employee Management

All direct employees are engaged under employment contracts or enterprise bargaining agreements that comply with the Fair Work Act and the National Employment Standards. We comply with all applicable employment legislation and industrial instruments and ensure that no employee is paid less than the minimum wage. We also

meet all superannuation and statutory leave obligations.

The safety of our workforce is a core priority. Our operations are underpinned by a strong safety culture, with a continual focus on improving safety performance and achieving a zero-harm environment for our employees, contractors, stakeholders and the broader community. In 2009, we were awarded Federal Safety Accreditation, becoming the first multi-disciplinary construction services company in Australia to receive this recognition.

Based on these controls, the risk of modern slavery practices occurring within our permanent workforce is considered negligible. Our highest workforce-related risk relates to the use of third-party labour hire providers. To mitigate this risk, we impose stringent contractual requirements relating to wage payment and compliance, and only engage reputable, licensed labour hire providers operating within Australia.

We have also identified migrant workers, particularly those without a lawful right to work in Australia, as being at increased risk of modern slavery practices. To address this risk, we use the Department of Home Affairs' Visa Entitlement Verification Online (VEVO) system to confirm the legal right to work of all employees.

Since 2021, we have reviewed and enhanced our onboarding processes, including the introduction of targeted questions designed to identify and address potential modern slavery risks at the commencement of employment.

Review of Practices

During FY25, we did not identify any instances of modern slavery within our operations, nor any instances in which we caused, contributed to, or were directly linked to modern slavery practices.

Awareness and Training

We have commenced the development of a comprehensive training program incorporating procurement, employment practices, legal compliance and modern slavery awareness. Training will be delivered through our centralised Learning and Development Academy and supported by awareness initiatives, including posters, email communications and toolbox talks.

The Academy delivers a range of core training modules that address matters relevant to modern slavery and support compliance with the Modern Slavery Act 2018 through the implementation of our Business Management Systems and procedures. These modules include Contract Management, Equal Opportunity and Diversity, Bullying and Harassment, Industrial Relations, Recruitment, Hiring and Onboarding, and Subcontractor Engagement (which already incorporates modern slavery considerations).

In addition to the Subcontractor Engagement module, the Recruitment and Hiring and Onboarding modules include specific content on the Modern Slavery Act 2018, its requirements and implications, and practical guidance on identifying potential indicators of modern slavery practices within our operations and supply chain.

Policies

We have implemented a suite of policies that apply to all employees and contractors, including a Modern Slavery Policy, Procurement Policy (which incorporates ethical procurement requirements), Subcontract Management Policy and Whistleblower Policy.

In addition, our Corporate Code of Conduct sets clear expectations regarding ethical behaviour, legal compliance and professional standards.

Governance

Under the leadership of the Risk Committee and with oversight from the Chief Executive Officer, Senior Management is committed to the implementation of the Modern Slavery Risk Mitigation Strategy. This strategy includes the identification and assessment of modern slavery risks, and the development and implementation of policies, codes of conduct and procurement processes designed to identify, assess and address modern slavery risks within our operations and supply chain.

We also maintain a corporate risk register that identifies the most significant risks across the business, including those relating to modern slavery and human rights. The effectiveness of associated control measures is monitored through ongoing reporting, with compliance subject to annual audit.

KEY PERFORMANCE INDICATORS

FY25 Key Performance Indicators

Performance against KPIs set for FY25 in the previous Modern Slavery Statement:

Key Performance Indicator	Status
Reconciliation of our supply chain against the uS Department of Labour List of Goods Produced by Child or Forced Labour during FY24 to identify potential modern slavery risks.	✓ Complete (but ongoing)
Undertake due diligence of any risks of modern slavery that we discover within our business or supply chain, including as part of our Subcontractor Management process.	✓ Complete (but ongoing)
Remediate any modern slavery discovered within our business supply chain.	✓ Complete (but ongoing)
Incorporation of a clause in our contracts (including subcontracts) and suppliers, requiring the same above transparency.	✓ Complete
Ongoing training on Ethical Procurement Policy.	✓ In progress - preparation of ongoing training in ethical procurement is underway
Inclusion of consideration of modern slavery issues within training in related areas.	✓ Complete - included in Subcontractor Engagement module
Run a refresher program to ensure compliance with on-boarding process for subcontractors is occurring as per company process.	✓ In progress - currently under review and planning)

FY26 Key Performance Indicators

We will continue to implement modern slavery clauses in all new contracts entered into with subcontractors and suppliers and will review modern slavery provisions contained in contracts issued by our customers. We will also continue to deliver training on modern slavery and the risks it presents to our business, with a particular focus on supply chain risks and regulatory obligations.

Any issues relating to modern slavery identified within the organisation will continue to be reported to the Risk Committee as they arise.

We have adopted the following Key Performance Indicators to assess the effectiveness of our actions during FY26:

- Reconciling our supply chain against the United States Department of Labor List of Goods Produced by Child Labor or Forced Labor during FY24 to identify potential modern slavery risks.
- Conducting due diligence on any modern slavery risks identified within our operations or supply chain, and implementing appropriate remediation measures where risks are identified.
- Increasing awareness across McMahon Services of the importance of assessing subcontractors and suppliers for modern slavery risks prior to engagement, through mechanisms other than formal training.
- Reviewing existing processes for screening new subcontractors and suppliers for compliance with modern slavery legislation and identifying opportunities for improvement.
- Establishing a consistent process for conducting random audits of subcontractors and suppliers to assess compliance with modern slavery legislation.





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