



RESPECTING HUMAN RIGHTS

JOINT MODERN SLAVERY STATEMENT

Reporting period: 1 January 2025 – 31 December 2025

2025



CIMIC Group Limited

ABN 57 004 482 982

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Cover image: HumeLink West, New South Wales, CPB CONTRACTORS, UGL and EIC ACTIVITIES
This page: Natural resources, THE THIESS GROUP



OUR GROUP AT A GLANCE

TRUSTED EXPERIENCE. END-TO-END SOLUTIONS.

At CIMIC Group we're using our engineering-led capabilities and advanced technologies to deliver end-to-end solutions for sustainable high-performing assets, infrastructure and resources projects.

Our companies are leaders in the engineering and construction, integrated solutions, natural resources and investment market segments.

We are passionate about connecting people to better services and opportunities with data centres and community-shaping projects like solar farms, major metro rail networks, water treatment plants, hospitals and schools.

We continue to expand what we achieve and how we shape the future by adding value for our clients, achieving sustainable returns, developing and keeping our team members safe and maintaining a reliable and trusted supply chain.

COMMITMENTS

We respect human rights and acknowledge the history and contributions of all local communities, including Traditional Owners and First Nation peoples. Across our locations, we recognise and value our responsibility to live and work on Country and with communities, respectfully and with care.

Our approach to evolving our business and improving environmental, social and governance outcomes is informed by key international principles and standards such as the UN Guiding Principles on Business and Human Rights, the UN Global Compact, the UN Sustainable Development Goals (SDGs) and the International Labour Organisation's standards.



Warringah Freeway Upgrade, New South Wales, CPB CONTRACTORS

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STATEMENT DEVELOPMENT AND APPROVAL SUMMARY

COMPANY INFORMATION AND OWNERSHIP STRUCTURE

CIMIC Group Limited ABN 57 004 482 982 is a fully owned subsidiary of HOCHTIEF Australia Holdings Limited ABN 17 103 181 675 (HOCHTIEF Australia), an entity incorporated in Australia.¹

HOCHTIEF Australia, based in Sydney, is fully owned by Germany based company HOCHTIEF Aktiengesellschaft (HOCHTIEF). Listed on the Deutsche Börse, HOCHTIEF is a global provider of engineering-led, end-to-end infrastructure solutions in North America, Australia and Europe with leading positions in rapidly expanding strategic growth verticals including the AI, Digital and Tech sector as well as the Energy, Defence and Critical Minerals markets supported by its long-standing, local presence in core infrastructure markets. Read more about [HOCHTIEF](#).

The largest shareholder in HOCHTIEF is Spain based company ACS, Actividades de Construcción

y Servicios, SA (ACS), listed on the Madrid Stock Exchange, which holds 80% of the shares in HOCHTIEF.²

The ACS Group delivers essential infrastructure, combining global scale with local expertise across the full project lifecycle in a broad range of strategic segments, including digital and advanced technology, security, energy, critical minerals and industrial resources, and core civil and urban infrastructure. Read more about [ACS Group](#).

This ownership structure provides a number of key benefits to CIMIC Group and the broader ACS Group of companies, particularly in respect to leveraging shared knowledge, best practices, people development opportunities, research and development (R&D), global procurement and client connectivity.

¹ CIMIC was removed from the Official List of the Australian Securities Exchange at the close of trading 11 May 2022 under Listing Rule 17.14, following compulsory acquisition of its remaining securities by HOCHTIEF Australia.

² As at 31 December 2025.



ABOUT THIS STATEMENT

CIMIC Group's³ 2025 Joint Modern Slavery Statement presents our annual report on the risks of modern slavery in our operations and supply chains, and actions to assess and address those risks, as required under Australia's *Modern Slavery Act 2018* (Cth) (the Act).⁴

This Statement is for the period 1 January 2025 to 31 December 2025. It is CIMIC Group's sixth Modern Slavery Statement and our fourth under HOCHTIEF Australia.⁵

Prepared as a joint statement pursuant to sections 14 and 16 of the Act, this Statement covers our reporting

entities as listed on page 8 and each of their owned and controlled entities. This includes HOCHTIEF Australia, CIMIC Group and our Operating Companies, CPB Contractors, Leighton Asia, UGL, Sedgman, and the Thiess Group (60% ownership), as well as Pacific Partnerships, EIC Activities, Devine, Leighton Properties and IDD Tech.

The Thiess Group is included⁶, having been excluded in 2021, 2022 and 2023 when CIMIC Group did not have a controlling interest in the business⁷. In 2021, 2022 and 2023 the Thiess Group prepared its own standalone Joint Modern Slavery Statements.

³ In this Statement a reference to 'CIMIC Group', 'the Group', 'we', 'us' or 'our' is a reference to CIMIC Group Limited ABN 57 004 482 982 and the entities that it controls unless otherwise stated.

⁴ *Modern Slavery Act 2018* (Cth). <https://www.legislation.gov.au/C2018A00153/latest/text>

⁵ All of CIMIC Group's previous Joint Modern Slavery Statements are available from cimic.com.au/Publications

⁶ CIMIC Group acquired an additional 10% of the equity in Thiess Group Holdings Pty Limited from Elliott Advisors (UK) Ltd (Elliott) in April 2024. The acquisition increased CIMIC's ownership of the Thiess Group to 60%. Consequently, CIMIC has fully consolidated the Thiess Group in its financial accounts from acquisition date 23 April until 31 December 2024. Thiess Group ESG information has been disclosed for the full twelve-month period in our 2024 and 2025 Statements. The put option for the remaining 40% is exercisable between April 2025 and December 2026.

⁷ In this document a reference to 'Thiess Group' is a reference to Thiess Group Holdings Pty Limited ABN 34 646 054 757 and the entities that it owns and controls unless otherwise stated.



Engineering and construction, LEIGHTON ASIA

The reporting entities for the purpose of this Statement are

HOCHTIEF Australia Holdings Limited	ABN 17 103 181 675
CIMIC Group Limited	ABN 57 004 482 982
CGI3 Pty Limited	ABN 79 653 589 649
CIMIC Group Investments No.2 Pty Limited	ABN 63 610 264 189
CIMIC Group Investments Pty Limited	ABN 74 126 876 953
CPB Contractors Pty Limited	ABN 98 000 893 667
Broad Group Holdings Pty Ltd	ABN 50 052 046 518
Broad Construction Pty Ltd	ABN 38 089 532 061
UGL Pty Limited	ABN 85 009 180 287
UGL Engineering Pty Ltd	ABN 96 096 365 972
UGL Operations and Maintenance Pty Limited	ABN 17 114 888 201
UGL Operations and Maintenance (Services) Pty Limited	ABN 76 010 045 299
Sedgman Pty Limited	ABN 86 088 471 667
Thiess Group Finance Pty Ltd	ABN 49 646 055 629
Thiess Group Holdings Pty Ltd	ABN 34 646 054 757
Thiess Group Investments Pty Ltd	ABN 43 659 649 055
Thiess MidCo Holdings Pty Ltd	ABN 45 645 168 672
Thiess Pty Ltd	ABN 87 010 221 486
Thiess SQ Holdings Pty Ltd	ABN 54 645 403 532
MACA Civil Pty Ltd	ABN 20 146 021 347
MACA Limited	ABN 42 144 745 782
MACA Mining Pty Ltd	ABN 22 102 886 064
MACA Plant Pty Ltd	ABN 29 110 779 167
PYBAR Holdings Pty Ltd	ABN 32 088 981 757
PYBAR Mining Services Pty Ltd	ABN 96 060 589 433
RTL Mining and Earthworks Pty Ltd	ABN 60 152 855 135
Leighton South East Asia Pty Ltd	ABN 64 682 088 179



STATEMENT PREPARATION AND APPROVAL

Preparation of this Joint Modern Slavery Statement has been managed by a CIMIC working group integrating team members from the People, Procurement, Risk, Legal, Compliance, Sustainability and Communications functions, in consultation and collaboration with HOCHTIEF Australia, CIMIC Group and our Operating Companies. Our Operating Companies have reviewed and verified the data contributed for this Statement and implemented the year's modern slavery management and prevention activities as applicable to their business.

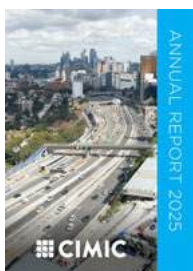
This Statement has been reviewed and approved by the principal governing body of the 'higher entity' as defined by the Modern Slavery Act 2018 (Cth), being the Board of HOCHTIEF Australia. Supporting this approval, this Statement has also been reviewed and approved by the Board of CIMIC Group Limited, the Executive Chairman, President and Chief Executive Officer of CIMIC Group, the Executive Chair and Chief Executive Officer of the Thiess Group, and the Managing Directors of each of our other Operating Company businesses listed on page 7.

All references to dollar amounts in this document are in Australian dollars.

Further reference

Our 2025 Joint Modern Slavery Statement can be read in conjunction with CIMIC Group's reporting suite available at cimic.com.au/publications.

Other relevant information and resources include the CIMIC Group [2025 Annual Review and Sustainability Report](#) and the [Thiess Group's 2025 Sustainability Report](#). Message from the Executive Chairman



Western Downs Battery Stage 1, Queensland, UGL





MESSAGE FROM THE EXECUTIVE CHAIRMAN

RESPECTING HUMAN RIGHTS. DELIVERING BETTER OUTCOMES.

CIMIC Group's sixth Modern Slavery Statement reaffirms our commitment to human rights, which are fundamental to sustainable development.

Considering people and future generations in the delivery of our infrastructure, services and resources projects is integral to achieving better outcomes for our clients, communities and those we work alongside in our supply chains.

CIMIC Group operates internationally across sectors including AI, digital and technology; energy; critical minerals; defence; and essential infrastructure. We generate value through innovation and technical excellence, with environmental, social and governance outcomes embedded in how we plan and execute our activities.

Given the scale of our operations, we recognise that modern slavery risks may arise within our operating environments and supply chains.

We do not tolerate modern slavery in any form, including exploitative labour practices such as forced labour, debt bondage and human trafficking. Our approach is anchored in our multidisciplinary framework across governance, compliance, procurement and people.

In 2025, we continued to enhance our response to modern slavery risks by embedding our Human Rights Policy and Procedure, progressing our risk assessment program, delivering training to build awareness and support reporting of potential risks, and maintaining robust supplier due diligence.

As modern slavery risks continue to evolve, we remain committed to strengthening our approach and working collaboratively with our clients, partners and suppliers.

Together, our efforts support stronger, more responsible practices, upholding human rights and contributing to better outcomes for the communities connected to our work, now and into the future.



Juan Santamaría

CIMIC Group Executive Chairman
ACS Group and HOCHTIEF AG Chief
Executive Officer

1. ASSET, INFRASTRUCTURE AND RESOURCES LEADER



Figure 1 – ACS Group brands

WE ARE PART OF A GLOBAL NETWORK

CIMIC Group is a fully owned subsidiary of HOCHTIEF Australia. HOCHTIEF Australia, based in Sydney, is fully owned by Germany based company HOCHTIEF Aktiengesellschaft (HOCHTIEF). The largest shareholder in HOCHTIEF is Spain based company ACS, Actividades de Construcción y Servicios, SA (ACS), which holds 80% of the shares in HOCHTIEF.

ACS Group

ACS Group delivers essential infrastructure that supports prosperity, driven by innovative thinking and the expertise of its people. The Group combines global scale with local expertise across the full project lifecycle – as an investor, developer, deliverer and operator – to create resilient, secure, and future-ready outcomes for clients, economies and communities.

The ACS Group is a collaboration of over 167,800 employees who work in an integrated manner, generating synergies and ensuring that ACS is present along the entire value chain, with sales of EUR 49,848 million in 2025 and order backlog of EUR 92,858 million at year-end.

The Group's leading companies deliver across a broad range of sectors, from social infrastructure and advanced manufacturing to digital and advanced technology systems that power the global economy. The Group supports defence, security, emergency response, transport, energy, and critical minerals through complex engineering and program delivery expertise. Together, these capabilities strengthen communities and provide the infrastructure backbone for sustainable, resilient growth.

With an approach based on adapting to the various markets and each project's needs, the Group's companies have a common corporate culture and values geared towards excellence, added value creation, profit generation and innovation, which contributes to the advancement of the communities in which it operates.

8 As at 31 December 2025.



DELIVERING HIGH-VALUE AND SUSTAINABLE END-TO-END SOLUTIONS

CIMIC Group is an engineering-led services, construction and natural resources leader with a history dating back to 1899.

Powered by 40,000 people, and pioneering technology and engineering, we deliver high-value and sustainable end-to-end solutions across assets, infrastructure and resources projects in around 20 countries.

HOCHTIEF Australia, CIMIC and the head company of each of our Operating Companies being CPB Contractors Pty Limited, UGL Pty Limited, Sedgman Pty Limited, Thiess Group Holdings Pty Ltd (60% ownership), Pacific Partnerships Pty Ltd, EIC Activities Pty Ltd, Devine Pty Ltd, Leighton Properties Pty Limited and IDD Tech Pty Ltd are all incorporated in Australia, apart from Leighton Asia Limited which is incorporated in Hong Kong.

Our mission is to generate sustainable returns by delivering innovative and competitive solutions for clients and safe, fulfilling careers for our people. We strive to be known for our principles of Integrity, Accountability, Innovation and Delivery, underpinned by Safety. Our first priority is to ensure the safety of our teams and the people we interact with, including our clients, partners, suppliers, and communities.

Principles



INTEGRITY: being respectful and honest with ourselves, our colleagues, our clients, our partners, our suppliers and other stakeholders



ACCOUNTABILITY: committing to what we are responsible for



INNOVATION: continually adapting and evolving for the future



DELIVERY: amplifying our ability to deliver to drive our reputation and credibility.

Underpinning these Principles is the **SAFETY** of our people and the communities we work within.

Figure 2 - CIMIC Group Principles

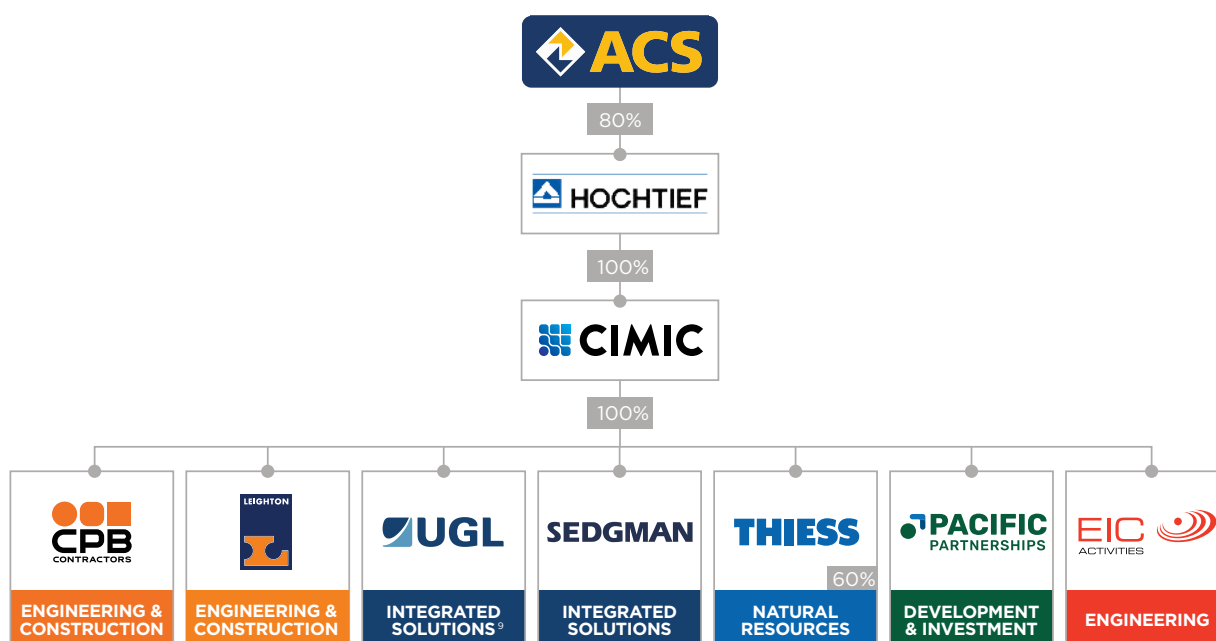


Figure 3 - CIMIC Group simplified structure of key operations

⁹ In December 2025, CIMIC Group announced the formation of a strategic partnership with Sojitz Corporation to establish a 50:50 joint ownership structure for UGL Transport. On 31 December 2025, CIMIC Group ceased to unilaterally control UGL Transport and in January 2026 the transaction formally completed. CIMIC will continue to own and operate 100% of UGL's specialist engineering, industrial services and operations across energy, resources, infrastructure, defence, telecommunications and technology.

2. OUR OPERATIONS AND SUPPLY CHAIN

CIMIC Group has an international presence with revenue of \$18.6 billion for FY25¹⁰ and work in hand of \$38.4 billion.¹¹ Our diversified businesses are industry leaders in a range of market segments – engineering and construction, integrated solutions, natural resources and investments.

Across these segments, we are delivering solutions for core and high-growth sectors and using our complementary and integrated capabilities to provide seamless whole-of-life solutions.

Our collective experience spans diverse sectors including:

- **Digital and advanced technology** – data centres, telecommunications networks, digitalisation and data visualisation software
- **Energy infrastructure** – renewable assets, power transmission lines and energy storage systems
- **Transport infrastructure and sustainable mobility** – roads, rail, aviation infrastructure, metro, light rail and intermodal networks
- **Biopharma, health, education and other social infrastructure** – biopharma, healthcare and education assets, and cultural, recreational and justice facilities

- **Critical minerals and natural resources** – mining services, mineral processing, resources infrastructure and mine rehabilitation
- **Defence and other essential infrastructure** – defence, water and wastewater.

Within these, our capabilities deliver the full spectrum of services, from feasibility, design, planning and investment; to manufacturing and construction; to operations, maintenance, upgrades and asset management; to rehabilitation and decommissioning.

Other CIMIC Group brands include our property development businesses Devine and Leighton Properties, and our commercial software development business IDD Tech.

We have built our reputation as a trusted partner on the quality, reliability and value our businesses deliver.

Our Group's safety record, financial strength, risk management processes, engineering capabilities, digital innovation, and sustainability performance position us to secure large complex projects and exceed client and community expectations.



Engineering and construction, LEIGHTON ASIA

¹⁰ Revenue (ie. statutory revenue) for FY25 includes 12 months of the Thiess Group result following acquisition of an additional 10% of the equity in the Thiess Group (increasing ownership to 60%) in April 2024. Consequently, CIMIC consolidates the Thiess Group in our financial accounts.

¹¹ Work in hand includes CIMIC Group's share of work in hand from joint ventures and associates.

KEY OPERATIONS

Engineering and construction



CPB Contractors has been delivering complex infrastructure and building projects across key sectors of the construction industry for more than 90 years. Supported by proven delivery systems, technology and digital tools that are combined with best practice construction methodology, the company's experienced project teams are trusted to deliver roads, rail, tunnelling, defence, building, health, renewables and energy resources infrastructure.



Leighton Asia is an established international construction company, delivering a portfolio of high-profile infrastructure projects throughout Asia. Established in 1974 and headquartered in Hong Kong, Leighton Asia is a proven leader in the delivery of complex tunnel, rail and road networks, as well as data centres. The company offers a comprehensive range of services across key sectors, including civil infrastructure, advanced technology, buildings, energy and resources, and Mechanical, Electrical and Plumbing (MEP).

Integrated solutions



UGL is specialist end-to-end engineering, services and operations provider, with a rich history dating back to 1899. Helping to play a role in people's lives every day, UGL keeps Australia moving through its transport manufacturing, maintenance and operations offering, and supports the energy sector through its renewables, power generation, resources and transmission operations. UGL is shaping the country through major infrastructure projects and preparing for the future with its new energy, defence, telecommunications and technology expertise.



Sedgman is a provider of minerals processing and associated infrastructure solutions to the global resources industry. It delivers services in critical and new economy minerals including cobalt, lithium (hard-rock and brine), nickel, rare earth minerals and vanadium, as well as in bulk minerals, precious and base metals, and industrial minerals. Sedgman partners with clients throughout the full project lifecycle, from initial concept design to delivery, ongoing operations and asset optimisation. Its capabilities are deployed at each stage to ensure project success and long-term value.

Natural resources



The Thiess Group provides services for the mining, infrastructure and resources sectors across Australia, Asia and the Americas. Its capabilities extend across the mine life cycle from engineering, asset management and maintenance services, extraction and haulage, civil and infrastructure, crushing and processing, and rehabilitation. The Thiess Group partners with clients and communities across geographies, commodities and cultures to deliver scalable and sustainable solutions in mining and beyond.

Corporate and investment



Pacific Partnerships is an experienced lead sponsor, developer and investor in infrastructure across Australasia, building on CIMIC Group's 25-year track record in Public Private Partnership (PPP) development. With a focus on sustainable solutions and unlocking value for clients and communities, the company has created, funded, owned, delivered and operated core transport and social infrastructure, and is well positioned to capture growth in transmission asset PPPs. Pacific Partnerships continues to develop renewable energy sources to support the transition to net zero. In the global digital and advanced technology sector, it is supporting ACS Group's capability across North America, Europe and Asia-Pacific.



EIC Activities is CIMIC Group's engineering and technical services business. Its engineering, design and risk mitigation expertise provides CIMIC Group with a competitive advantage for winning and delivering profitable projects that also generate value for clients. EIC Activities ensures that the Group's collective experience, technical capabilities, innovations and leading-edge technology applications are leveraged to deliver our clients' objectives.

KEY OPERATING LOCATIONS

CIMIC Group operating locations for its key operations, illustrated in Figure 4, include:

- CPB Contractors – Australia, New Zealand, Papua New Guinea
- Leighton Asia – Hong Kong, India, Indonesia, Macau, Malaysia, Singapore, Thailand, the Philippines
- UGL – Australia, New Zealand
- Sedgman – Australia, Canada, Germany, United States of America
- The Thiess Group – Australia, Canada, Cambodia, Chile, India, Indonesia, Mongolia, Singapore, United States of America
- Pacific Partnerships – Australia, New Zealand
- EIC Activities – Australia, New Zealand

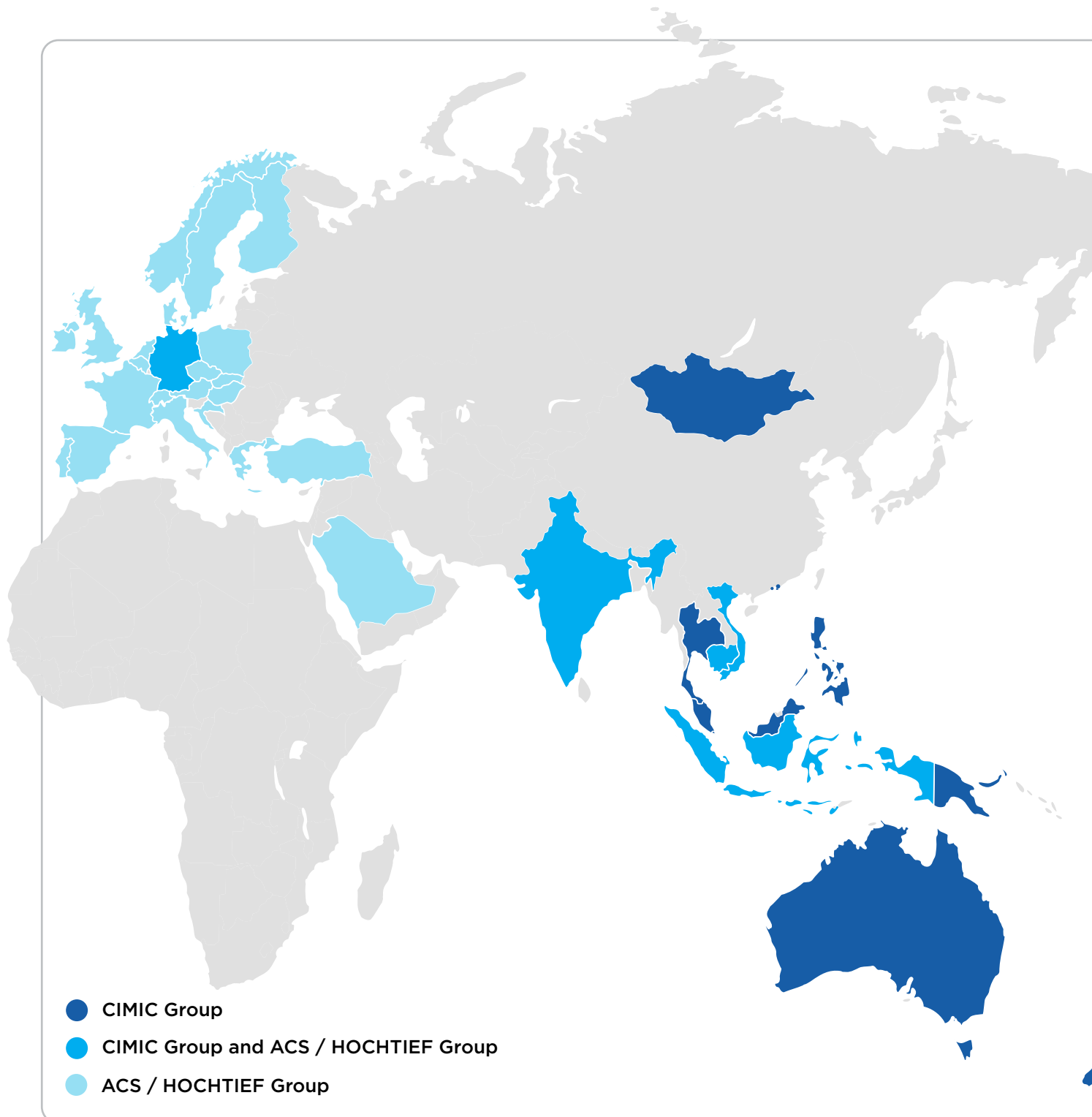
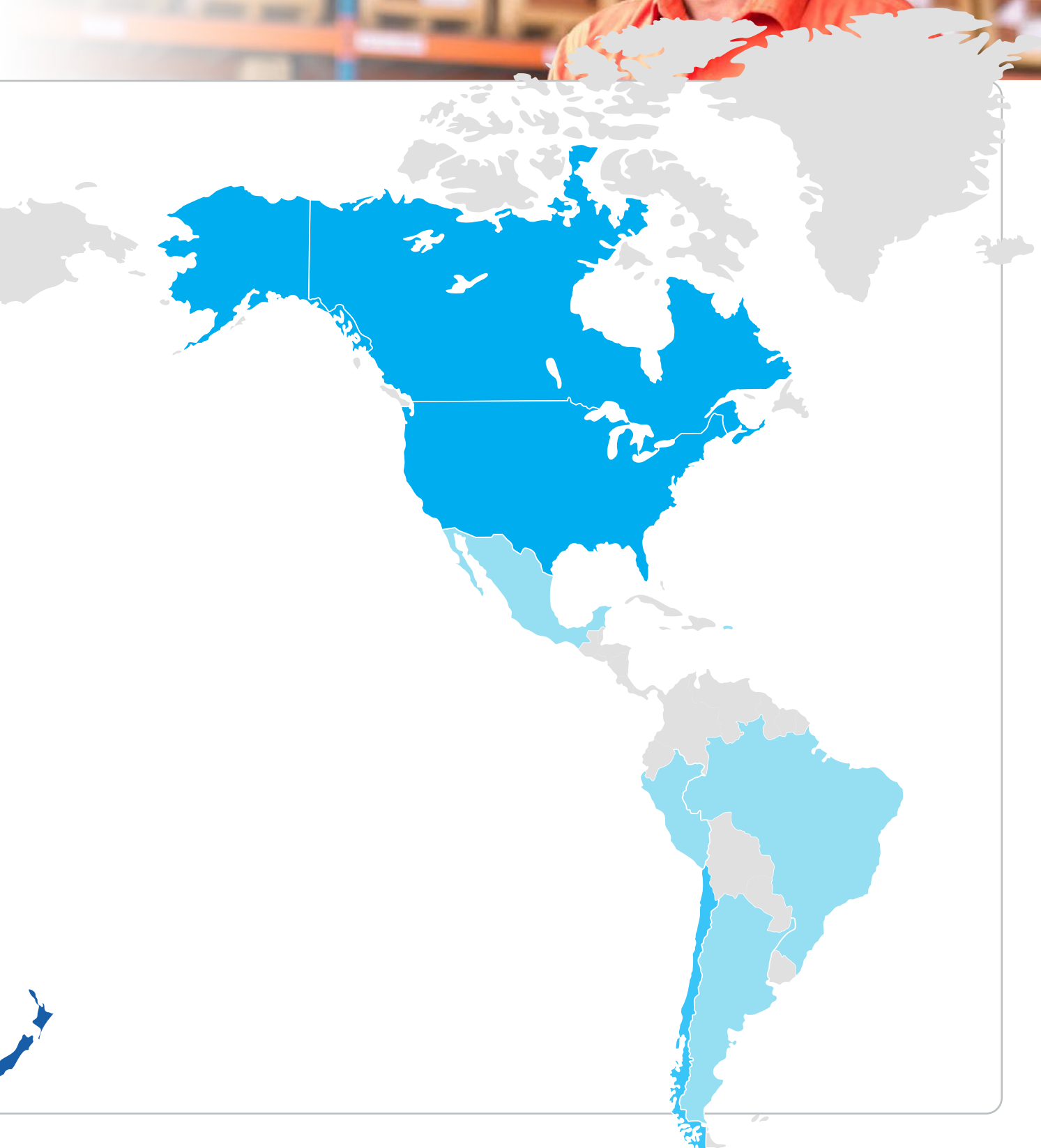


Figure 4 – Key operating locations



SUPPLY CHAIN

In 2025, our Group spent approximately \$10.3 billion on procurement of supplies and services, locally, nationally and internationally, for our projects and businesses. Of approximately 21,500 direct suppliers we worked with in 2025, all have been risk assessed and about 79% were local¹² to our projects. We procured \$181 million worth of goods and services from Indigenous businesses¹³ in Australia.

The products and services we procure are those used in development, design, financing, construction, operations and maintenance, and management of projects and the related corporate functions.

Key areas of spend include:

- professional services
- IT systems, software solutions and telecommunications
- personal protective equipment (PPE)
- major plant and equipment such as tunnel boring machines, and mineral processing equipment
- rail componentry and rolling stock
- industrial/engineering consumables such as fuel, lubricants, abrasives, adhesives and sealants
- materials such as concrete, steel, piping and asphalt
- heavy mining equipment
- subcontractors such as electricians, plumbers, glaziers, steel fixers and other tradespeople
- labour hire
- insurance.

We generally do not manufacture our own products except where CPB Contractors produces precast concrete components for construction projects, UGL manufactures, upgrades and maintains rolling stock

and some rail specific componentry, and the Thiess Group rebuilds and reconditions major components and equipment for mining. Parts may be sourced locally or imported.

Our procurement of services includes activities that relate to corporate support such as facilities and maintenance, accounting, legal and IT services, and professional consulting services such as design and engineering. All of these complement our own internal resources for either short or long-term engagements as required.

In the area of IT, CIMIC Group has dedicated internal resources that support Corporate and project requirements including ONE IT, our unified technology function, and IDD Tech. IDD Tech, our commercial software development company develops Integrated Digital Delivery software solutions for CIMIC Group and clients across the construction, resources and services sector.

Our focus on responsibly sourcing products and services improves sustainable project outcomes.

For the local community, our engagement of local suppliers generates jobs and business opportunities which stimulate regional economic growth and build a skills legacy that will support future development.

Across Australia, in metropolitan, regional and remote areas, Indigenous businesses are providing us with services including technology solutions; civil, environmental and remediation works; fleet management and transport; waste management, plumbing and labour hire, recruitment and training, as well as PPE supplies, printing, cleaning and catering - to name just a few.

Natural resources, THE THIESS GROUP



¹² This calculation is made on a country-to-country basis. The percentage is calculated by deeming any supplier within the country that is using an ABN (or equivalent) associated with that country as a local supplier.

¹³ Indigenous suppliers are identified in jurisdictions with an established certification/registration mechanism. Indigenous suppliers are those registered or certified with recognised indigenous business directories or verification bodies.



Figure 5 - Supply chain 2025



Engineering and construction, CPB CONTRACTORS



3. UNDERSTANDING OUR MODERN SLAVERY RISKS

We recognise that in delivering assets, infrastructure and resources projects, both in Australia and internationally, we operate in some markets with supply chains that may have a potential exposure to modern slavery risks, and this demands a high degree of vigilance in meeting our obligations.

Our understanding of the drivers, vulnerable groups and the hidden but pervasive presence of modern slavery, and our approach to addressing it, has been informed by the UN Guiding Principles on Business and Human Rights, the UN Global Compact, the UN Sustainable Development Goals and the International Labour Organisation's standards.

Our insight is also facilitated by:

- the Global Slavery Index (GSI) published by Walk Free
- our risk processes and policies, including our Risk Management Framework
- our supply chain risk assessments, including use of our externally provided third party screening tool
- our program of Human Rights Risk Assessments (HRRAs) which commenced in 2017

- our ongoing country risk analysis, examining salient human rights risks, and the level to which human rights are protected, promoted and respected in each country
- HOCHTIEF's Statement of Principles on Human Rights
- ACS Group's Human Rights Policy.

Modern slavery risks can be present in the construction, mining, minerals processing, heavy manufacturing and maintenance sectors in which we operate. These risks may present as exploitative practices such as debt bondage, child labour, forced labour and human trafficking, as detailed below, and may be heightened in some of the jurisdictions in which we operate.

Given the diversity and breadth of CIMIC Group's geographies and markets, we monitor for a wide range of risks that have the potential to materially impact our operations, people, and reputation, the environment and communities in which we work, and the financial prospects of the Group.



Engineering and construction, CPB CONTRACTORS

OPERATIONS RISK

Prior to establishing operations in new countries, we conduct a risk analysis using the Group's Country Risk Assessment template, which includes consideration of human rights and modern slavery risks, in accordance with the Group's Approval to Operate Internationally Policy. We maintain a register of approved countries which supports any subsequent tendering processes in those countries.

We also review human rights risks in our approved countries of operation by performing country-by-country analysis across key human rights risk areas, leveraging our Human Rights Country Analysis. Further detail on our Human Rights Country Analysis is provided on page 22.

Complementing these processes, we continue to use HRRAs to extend our identification and understanding of human rights and modern slavery risks at the project level in our countries of operation. Further detail on our HRRa program is set out in section 4 *Assessing and addressing the risk of modern slavery*.

HUMAN RIGHTS COUNTRY ANALYSIS

Review of countries where we operate

The human rights country analysis, established in collaboration with HOCHTIEF AG and an independent agency in 2021 continues to be regularly reviewed and refreshed.

The analysis assesses the level to which key human rights are protected, promoted and respected in each country where CIMIC operates, specifically analysing:

- Protection – human rights protection offered by government and institutions
- Promotion – legal human rights due diligence requirements applicable to companies, the legislation in force and the voluntary framework on business and human rights
- Respect – the most vulnerable human rights issues.

A foundational assessment of each country against 12 criteria across the following frameworks, conventions and indices underpins the analysis:

- United Nations Human Rights Framework
 - ▶ Ratification of United Nations Treaties
 - ▶ Presence in United Nations Committees
 - ▶ Reporting to the United Nations Committees
- International Labour Organisation
 - ▶ Ratification of ILO Fundamental Conventions
- Regional Human Rights Framework
 - ▶ Regional Systems of Human Rights
- National Human Rights Indexes
 - ▶ Fragile States Index
 - ▶ Corruption Perception Index
 - ▶ Modern Slavery Index
 - ▶ Death Penalty Index
 - ▶ Average Working Hours (ILO)
 - ▶ Global Gender Gap Ranking 2020
 - ▶ Global Rights Index 2021.

In 2024, CIMIC Group expanded and built upon these frameworks by further examining priority human rights risk areas for each country and

industry in which we operate, having regard to local laws, regulations, the economic and social environment, and practices which apply to each area. These risk areas are consistent with our shareholder, HOCHTIEF AG's, scope of human rights risk areas under the German Supply Chain Due Diligence Act (LkSG) and include the following:

- Forced labour and all forms of slavery
- Occupational safety and health and work-related health hazards under applicable local laws
- Freedom of association under applicable local laws
- Right to equality and non-discrimination in employment under applicable local laws
- Land rights and pollution under applicable local laws
- Inappropriate use of security forces under applicable local laws
- Conditions of work, right to life, liberty and security under applicable local laws

CIMIC continues to review and assess human rights risk areas to ensure currency of the Human Rights Country Risk Analysis.

In 2025, we also continued to review and assess our human rights risk profile with Human Rights Risk Assessments (HRRAs) conducted in selected countries of operation. See Section 4 Assessing and addressing the risks of modern slavery for further information about our HRRAs program.

Our ongoing risk analysis has provided deeper insight into the human rights landscape associated with each country's political, social, and economic context; legal requirements for businesses' human rights due diligence; and main human rights risk factors. This information supports our relevant managing functions in developing and monitoring appropriate controls to prevent, mitigate or respond to each risk.

SUPPLY CHAIN RISK

The Group procures goods and services from Australia and internationally. Certain goods and services have a higher risk of human rights risks such as modern slavery. These can include the production of garments, apparel, and PPE; the supply of raw materials, electronic products and steel fabrication; solar panel suppliers and the provision of certain services including labour hire, cleaning, freight and logistics.

We remain committed to refraining from purchasing 'at risk' goods and services and inadvertently contributing to modern slavery or other human rights risks. We do this in part through our due diligence processes which include supplier screening and other onboarding and/or prequalification steps and using, wherever possible, a suite of template commercial contracts which include template clauses on modern slavery and human rights and indirect supplier controls. These are detailed in Section 4 *Assessing and addressing the risks of modern slavery*.

DIGITALISATION SUPPORTING SUPPLY CHAIN DUE DILIGENCE AND MANAGEMENT

Leveraging integrated technologies to understand and manage our supply chain

CIMIC Group is using its integrated digital delivery capability to continuously improve information and data management, operational performance and ESG outcomes. This includes linking a range of digital solutions to support our due diligence processes and supply chain governance.

Our approach includes using a mix of leading industry tools and developing our own proprietary solutions to provide greater transparency, simplicity, and control in the management of our supply chain. Examples from our suite of tools are described below.

Supplier screening and onboarding

We use an external provider's screening tool to evaluate and monitor vendors, suppliers and business partners for risk factors.

These include, but are not limited to, legal status, watchlists (e.g. sanctions / enforcements / PEPs), global slavery index, corruption perception index, country risk, industry risk, subject entity risk and any adverse media, including in areas such as human rights, health and safety, impacts on the environment, regulatory matters and other risk factors. Once we accept a third party, the tool enables ongoing monitoring of that third party for changes in key risks.

See further detail in Section 4 *Assessing and addressing the risk of modern slavery – Procurement*.

Supplier management

Our supply chain visibility is enhanced through a custom-built supplier management and procurement software solution. This secure, cloud-based application supports procurement, from supplier registration to contract award. It also serves as our register of suppliers. The software's features include financial and non-financial evaluations. It provides a centralised supplier database which can be accessed and updated by projects.

The data we collect from suppliers via this platform in the way of questionnaires and forms offers valuable insights into potential supplier risks, such as health and safety, quality, financial risks, compliance, and ESG factors. This key information aids our due diligence processes. The supplier database also helps us to engage efficiently with local, social and Indigenous suppliers to ensure they are provided opportunities to work with the Group.



Integrated solutions, UGL



4. ASSESSING AND ADDRESSING THE RISKS OF MODERN SLAVERY

OUR INTEGRATED APPROACH

To assess and address modern slavery risks CIMIC Group leverages its governance, compliance, procurement and people frameworks, to ensure we apply a consistent and disciplined approach across our Operating Companies.

Summarised in Table 1 on page 26 and detailed on the following pages, these mature and integrated frameworks provide a range of cohesive levers for consulting and aligning our businesses, managing risk, assessing performance and engaging our people and suppliers – including an open, confidential and responsive grievance and reporting mechanism.

Our approach, due diligence and assurance are facilitated by collaboration between specialist functions in the parent company, CIMIC, and our Operating Companies including People, Procurement, Risk, Legal, Compliance, Internal Audit, Sustainability and Communications.

To enhance our ability to identify, mitigate, and prevent the risk of modern slavery, and respond to any impacts should they occur, we work through a cycle of action, investigation, evaluation and critical analysis, and remediation.

From this we use evidence-based assessments of our practices and new initiatives to inform our planning and continual improvement steps.



Integrated solutions, SEDGMAN

Onboarding acquired businesses

CIMIC Group's business strategy includes taking a disciplined approach to strategic investment, unlocking growth opportunities and extending our capabilities, while maintaining capital discipline and preserving balance sheet strength.

Our integration processes align policies and procedures, including in the area of modern slavery, embedding our integrated governance, compliance, procurement and people frameworks. Throughout the transition we focus on safety, continuity of service to clients and supporting new and existing team members through the change to continue developing rewarding careers.

In December 2025, CIMIC announced a strategic partnership with Sojitz Corporation, establishing a 50:50 joint ownership structure for UGL Transport, which was formally completed in January 2026.¹⁴

Formal completion of Sedgman's acquisition of Arizona-based engineering consultancy FSI Engineering and Design occurred in February 2026.¹⁵

For each of these transactions, our integration processes commenced upon partnership formation/acquisition and are ongoing in 2026.

During the reporting period, we also accelerated integration of the companies acquired in 2024.

¹⁴ UGL Transport, a division of CIMIC company UGL, is a leading integrated transport services platform operating across Australia and New Zealand. Following regulatory approvals and the fulfillment of customary conditions, Sojitz Corporation has acquired a 50% equity interest in UGL Transport, establishing the joint ownership structure. Together, we will expand into new markets and technologies, including Asia Pacific opportunities in collaboration with Leighton Asia, while continuing to support Australia's transport networks. CIMIC will continue to own and operate 100% of UGL's specialist engineering, industrial services and operations across energy, resources, infrastructure, defence, telecommunications and technology.

¹⁵ Sedgman, a member of the CIMIC Group acquired the Arizona-based engineering consultancy FSI Engineering and Design, Inc. The acquisition will strengthen Sedgman's ability to deliver end-to-end engineering, procurement and construction management (EPCM) services in the United States.



Summary – Assessing and addressing modern slavery risks

This table highlights key elements of our governance, compliance, procurement and people frameworks which guide and support how we assess and address modern slavery risks. They strengthen Group alignment, risk management, and how we engage with our people and stakeholders, monitor grievances and pursue continuous improvement.

	GROUP ALIGNMENT	RISK MANAGEMENT	ENGAGEMENT, MONITORING AND CONTINUOUS IMPROVEMENT
 GOVERNANCE	• Principles • Code of Conduct • Board and Committees • Group Policies and Procedures	• Risk management framework • Management systems • Board Charter • Board Ethics, Compliance and Sustainability Committee Charter • Group Governance System • Internal Audit Charter	• Human Rights Action Plans (updated annually) • Business Conduct Representatives • Reportable Conduct Groups • Human Rights Coordinators • Human Rights Committee • Board Ethics, Compliance and Sustainability Committee • Ongoing liaison with Government, industry and regulators
 COMPLIANCE	• Policies and procedures relevant to human rights and modern slavery issues, such as: ▸ Code of Conduct ▸ Human Rights Policy and Procedure ▸ Approval to Operate Internationally Policy ▸ Risk Management Policy ▸ Group Tendering Policy and Procedure ▸ Third Parties Policy and Procedure ▸ Procurement Policy ▸ Sustainability Policy and Procedure ▸ Health and Safety Policy ▸ Whistleblower Policy ▸ Anti-Bribery and Corruption Policy ▸ Gifts and Hospitality Policy ▸ Group Compliance Policy and Procedure	• Board Ethics, Compliance and Sustainability Committee reporting and review • Working groups and management committees supporting Group alignment and compliance: ▸ Compliance Working Group ▸ Human Rights Committee ▸ Sustainability Forum ▸ Tender Risk Management Committee ▸ CIMIC Disclosure Committee ▸ Diversity and Inclusion Forums	• Grievance and reporting mechanism ▸ Complaints and Investigation Procedure and Whistleblower Policy ▸ Business Conduct Representatives and Reportable Conduct Groups at CIMIC and Operating Company levels ▸ Independent Ethics Line • Annual / ad hoc compliance assurance reviews • Internal audit activities • Monitoring of legal and regulatory changes related to modern slavery • Human rights country risk analysis

Table 1: Summary - Assessing and addressing modern slavery risks

	GROUP ALIGNMENT	RISK MANAGEMENT	ENGAGEMENT, MONITORING AND CONTINUOUS IMPROVEMENT
 PROCUREMENT	• Third Parties Policy and Procedure • Procurement Policy • Delegations of Authority	• Supply chain identification, assessment and management of risks relating to modern slavery by processes such as: ▸ Supplier registration ▸ Externally provided third party screening tool, onboarding, and ongoing monitoring for any changes in key risks ▸ Third Party Business Integrity Declaration Form ▸ Supplier pre-qualification questionnaires ▸ Template commercial contracts incorporating modern slavery and human rights clauses	• Supplier access to grievance and reporting mechanism, including the independent Ethics Line • Procurement internal audits • Financial related data detection analytics
 PEOPLE	• People policies including ▸ Diversity and Social Inclusion Policy ▸ Family and Domestic Violence Policy ▸ Flexible Working Policy ▸ Health and Safety Policy ▸ Human Rights Policy, Procedure and other supplementary tools ▸ Parental Leave Policy ▸ Recruitment Policy, procedures and management systems ▸ Redundancy Policy ▸ Remuneration Policy ▸ Whistleblower Policy ▸ Workplace Behaviour Policy • Complaints and Investigations Procedure	• Human Rights Risk Assessments	• Education and training ▸ Leadership and culture ▸ Code of Conduct training ▸ Compliance training ▸ Human rights and modern slavery awareness training ▸ Workplace behaviour and equal employment opportunity training • Reporting and grievance framework • Complaints investigation procedures • People process internal audit

GOVERNANCE AND LEADERSHIP

CIMIC Group's governance approach is founded in our Principles of Integrity, Accountability, Innovation and Delivery, underpinned by Safety. Our governance framework and Code of Conduct establish the overall operating parameters for our entities and guide our people and decisions.

Code of Conduct

Our Code of Conduct sets the standard of behaviour we expect from all our employees, sub-contractors and partners. Where the Code of Conduct or a policy sets higher standards of behaviour than local laws, rules, customs or norms, the higher standards apply.

Our Code of Conduct rejects all forms of modern slavery including, but not limited to, the trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage and deceptive recruiting for labour and services. We do not tolerate unlawful child labour or any form of exploitation of children or young people and commit to complying with the International Labour Organisation (ILO) with respect to under-age workers.

Governance framework

We substantially retain the governance of a listed company and have a highly experienced Board and management team.

Ultimate accountability for CIMIC Group rests with our Board. The Board delegates specific responsibilities to the Ethics, Compliance and Sustainability Committee (ECSC) and management, under the leadership of the Chief Executive Officer.

Our Code of Conduct, Board Charter, ECSC Charter, Delegations of Authority and Policies¹⁶ establish that the Board, ECSC and management bodies have oversight of sustainability-related impacts, risks and opportunities (including environment, social and governance matters related to human rights and modern slavery), with a role in setting targets and reviewing progress.

Management's preparation and analysis of quarterly and annual reporting and accompanying papers for the ECSC and Board's review and approval, is key to ongoing review of our sustainability strategy, targets, requirements and performance.

Thiess Group governance

In 2024, CIMIC Group acquired an additional 10% of the equity in Thiess Group Holdings, increasing its ownership to 60% and strengthening its governance over the day-to-day operations of the company.

The Thiess Group has its own independent governance structure which is aligned to CIMIC's governance structure and adapted where necessary based on sector or jurisdictional specific requirements. The Thiess Group Holdings Board, which includes CIMIC Group representatives, has overall responsibility for setting the company's sustainability and governance approach.

The governance structure includes cross-functional Board Committees for strategic oversight and input, Management Committees to support the CEO and Executives, and Working Groups to support the business. Each level of the governance structure provides input into critical sustainability risks and opportunities.

The Thiess Group's governance framework and governance system architecture include policies and charters, standards, company-wide procedures, tools and knowledge and project wide procedures, tools and knowledge.

The Thiess Group is a member of the United Nations Global Compact (UNGC) Network Australia and its Modern Slavery Community of Practice. As part of this membership, in 2025, the Thiess Group participated in the Australian Government's consultation process on proposed amendments to the Modern Slavery legislation and submitted its second UNGC Communication on Progress in July 2025 reaffirming its commitment to the UNGC principles.

For further information about the Thiess Group's governance please see the [2025 Thiess Group Sustainability Report](#) and [Thiess Group | Corporate Governance](#).

CIMIC Group's Board

CIMIC Group's Board is responsible for the overall strategy, governance and performance of the Group, and oversees a tiered system of responsibility and accountability. The Board's role and responsibilities are established by the CIMIC Group Board Charter

which establishes that the Board and each Director will at all times have regard to the Constitution and the Group's frameworks, policies, codes, standards, rules and processes, the Corporations Act, and all other applicable laws.

¹⁶ CIMIC Group's Code of Conduct, Constitution, Board Charter, ECSC Charter, External Auditor Independence Charter and key policies are available on our website's Governance pages at [CIMIC Group | Our Group](#)



Engineering and construction, LEIGHTON ASIA

Ethics, Compliance and Sustainability Committee

The ECSC assists the Board in fulfilling its corporate governance and oversight responsibilities and compliance with all applicable legal and regulatory requirements and internal policies.

The ECSC monitors and reviews the Group's ethical standards and practices including compliance with the Group's Code of Conduct, Workplace Behaviour Policy, Whistleblower Policy, and Anti-Bribery and Corruption Policy. The Committee's scope includes consideration of impacts, risks and opportunities: compliance; and performance in areas such as health and safety, diversity and social inclusion, human rights including modern slavery, the environment, sustainability, and business conduct.

Chief Executive Officer and Executive Leadership

The CIMIC Board delegates responsibility for the day-to-day management of CIMIC to the CEO. The CEO is responsible for developing, presenting and proposing the strategic direction for the business, and for achieving the strategic and operational objectives for the Group. The CEO is supported by CIMIC's Executive Leadership Team (ELT).¹⁷

Each Operating Company functions as a distinct business under the direction of its ELT and is managed by a head corporate entity. The Operating Company ELT and Functional leads report to CIMIC's ELT and Functional leads as required.

ELTs at CIMIC and each Operating Company apply our governance framework to drive due diligence

and compliance in support of consistent sustainable value creation for our clients and communities and our business.

Governance is further supported by CIMIC's and each Operating Company's Business Conduct Representative¹⁸ (BCR) and their Reportable Conduct Groups¹⁹ (RCG), Human Rights Coordinators at CIMIC and each Operating Company, as well as the Group's Internal Audit and Compliance functions. These are complemented by a network of cross-Operating Company working groups and management committees (described below).

Under our Internal Audit Charter, our Internal Audit function reports directly to the CIMIC Chief Executive Officer on all administrative matters and functionally to the CIMIC Board on audit planning, progress and output. The function operates in two work streams: Group Internal Audit and Forensics and Data Analytics – with access to key functions, records, property and personnel of the Group. It provides independent and objective assurance on the adequacy and effectiveness of the Group's systems for risk management, internal control and governance, along with recommendations to improve the efficiency and effectiveness of these systems and processes.

The Compliance function oversees requirements to adhere to both external and internal compliance obligations and mitigate compliance risk, guided by our Group Compliance Policy and Procedure.

We leverage advanced management systems to drive repeatable excellence. Where relevant, our Operating Companies work on shared platforms, technology solutions and processes, underpinned by our shared policies, to create efficiency and consistency.

¹⁷ In February 2026, a new additional role of President and Executive Director of CIMIC Group was established which will lead strategic direction, governance and long-term growth.

¹⁸ The Business Conduct Representative is a senior person within the Legal function who supports the operation of the Code of Conduct.

¹⁹ The Reportable Conduct Group comprises the Chief Executive Officer or Managing Director, Chief Financial Officer, General Counsel, and Head of People.

Key policies

CIMIC's governance framework provides a comprehensive series of integrated frameworks, policies, procedures, and guidelines for the Group. These span areas such as corporate governance, compliance, ethics, people, safety, environment, sustainability, legal, communications, finance, operations including tendering and procurement, strategy, mergers & acquisitions, risk, information technology and innovation. Key policies related to human rights and modern slavery include:

- **Group Human Rights Policy and Procedure** – provide the framework to assess and address the risks of human rights, including modern slavery, setting out accountabilities, our operational and supply chain risk controls and the reporting process to which we adhere. The Policy, and its supporting Procedure, outline CIMIC Group's commitment to respect applicable internationally recognised human rights.
- **Group Third Parties Policy and Third Parties Procedure**²⁰ – guide how CIMIC Group companies engage with external parties, including clients, joint venture partners, business partners, subcontractors, consultants, suppliers and service providers. They outline processes to identify, assess, and mitigate third-party risks before formal engagement, and to monitor and manage those risks throughout the relationship.
- **Group Risk and Risk Management Policies** – set out the requirements to identify, analyse, evaluate, treat, monitor, review and report risks that have the potential to impact the Group. These risks may relate to our people, third parties, the general public, the communities in which we work, the environment, our operations, financial outcomes, reputation and other areas of exposure. Our risk management framework²¹ is tailored to our business and aligned to our objectives, both short and longer term.
- **Group Approval to Operate Internationally Policy** – seeks to ensure that we do not operate in countries that could pose significant integrity, legal, financial, operational, reputational, security and other business risks to the Group (and includes consideration of human rights and modern slavery risks). The Policy mandates the use of a traffic light system to rate a country's approval status or its prospective risk, using a Country Risk Assessment template. We maintain a register of approved countries and integrate its use with our Delegations of Authority and Tendering Policy to support risk assessment and policy compliance.
- **Group Sustainability Policy and Procedure** – set out the Group's commitments and objectives for sustainability, including the integration of environmental, social (including human rights and modern slavery matters) and governance factors into decision making and management of sustainability risks and opportunities.²²
- **Group Tendering Policy and Procedure** – document the requirements for pursuing new work opportunities. Key elements of our risk assessment process for tendering include due diligence to assess country and partner risks and ensure the Group is not exposed to any integrity risks (including human rights and modern slavery risks) or reputational damage. It also includes a four-stage gate approval process, financial assessments, commercial and contract risk assessments, and the requirement to form a Tender Risk Management Committee to review important opportunities. All contracts must be approved in accordance with the Group Delegations of Authority which sets out the authority levels that have been delegated to the executive management and employees of CIMIC Group across aspects of our business.
- **Group Compliance Policy and Procedure** – set out the Group requirements and processes to adhere to both external and internal compliance obligations and mitigate compliance risk to ensure the Group's mission and principles are achieved.

²⁰ Our updated Third Parties Policy and new Third Parties Procedure were introduced in 2025.

²¹ Our risk management processes are aligned with the ACS Group's Risk Management approach and to ISO 31000.

²² In 2025, we updated the Sustainability Policy and introduced a new Sustainability Procedure.





CIMIC GROUP'S HUMAN RIGHTS POLICY AND PROCEDURE

Enhancing consultation and engagement across CIMIC Group

Our Human Rights Policy and Procedure²³ outline CIMIC Group's commitment to respect applicable internationally recognised human rights. They provide the framework to assess and address human rights risks in our operations and supply chains to avoid causing or contributing to adverse impacts on the human rights of people involved in our global operations.

The Policy and Procedure integrate with, and leverage, CIMIC Group's broader governance system and facilitate ongoing consultation across the Group for compliance, continuous learning and improvement.

The Human Rights Policy sets out the CIMIC Group accountabilities and commitments.

Under the Human Rights Procedure, our Operating Companies appoint a Human Rights Coordinator, maintain a Human Rights Action Plan for assessing and addressing human rights risks (revised annually), and participate in the Group Human Rights Committee.

Our Human Rights Action Plan template guides Operating Companies on minimum operational and supply chain control requirements to be addressed in the plan. Examples include:

- a Human Rights Risk Assessment (HRRRA) plan to cover each country of operation over a specified time period
- use of the externally provided third party screening tool to assist in screening suppliers and third parties as part of the supply chain due diligence process
- use of CIMIC Group template contracts for goods or services procured wherever possible, including clauses with respect to human rights and modern slavery
- conducting partner and country risk assessments, which include consideration of modern slavery risks, when pursuing potential work opportunities
- employee recruitment and selection practices in accordance with relevant CIMIC Policies and Procedures
- mandatory human rights and modern slavery awareness training for employees.

Supporting the governance framework, our Human Rights e-learning module builds upon our team's awareness and skills to identify and report human rights risks or concerns.

²³ In 2024, CIMIC Group expanded the scope of its Modern Slavery Policy and Protocol (developed in 2021) to establish a Human Rights Policy and supporting Procedure, in line with evolving local and international developments.

COMPLIANCE

Our compliance, due diligence and internal audit framework engages our businesses on their compliance obligations – including the requirements stated in our Code of Conduct and policies such as the Human Rights Policy, Anti-Bribery and Corruption Policy, Third Parties Policy, Group Procurement Policy, Health and Safety Policy, Workplace Behaviour Policy and Whistleblower Policy.

Executive Management's oversight of sustainability and their communication of ESG matters, including human rights and modern slavery matters, to the ECSC and Board is further supported by their engagement with and reports from our cross-Operating Company working groups and management committees including:

- **Reportable Conduct Groups (RCG)** – are in place at CIMIC and each Operating Company. They review ethical matters, and periodically (but at least quarterly) the CIMIC RCG is provided with reports about matters reported, outcomes, actions taken, trends and the success or otherwise of systems in place to support compliance with the Group Code of Conduct. The CIMIC RCG reports quarterly to the ECSC.
- **Human Rights Committee** – comprising representatives from CIMIC and each Operating Company, including Human Rights Coordinators, and representatives from functional areas relevant to the subject topics within the Committee's scope, for example human resources, legal, compliance, procurement, safety and communications representatives. The objective of this Committee is to discuss, assess and plan for relevant activities associated with addressing and assessing human rights risks across the Group. Activities are guided by the Human Rights Policy and Procedure.
- **Compliance Working Group** – consisting of the Group Manager Compliance and each of the Operating Companies' General Counsels (or their delegates), which reviews and discusses compliance activities and reporting requirements. Activities are guided by the Compliance Policy and Procedure.
- **CIMIC Disclosure Committee (CDC)** – comprises CIMIC's Disclosure Officers and the Group General Counsel and is chaired by the Chief Financial Officer. The CDC reviews information for the purpose of determining whether it should be disclosed and oversees compliance with CIMIC's ongoing disclosure requirements. To support the CDC in carrying out its function, each Operating Company has Information Disclosure Officers who identify information that may need to be disclosed.
- **Tender Risk Management Committee** – involves CIMIC and Operating Company management in regular reviews of tenders, contracts and project delivery. Reviews ensure development and submission of competitive sustainable solutions, proactive management of risk, and projects' financial, commercial and sustainability performance. Activities are guided by the Risk Management, Approval to Operate Internationally, Sustainability, Tendering, Third Parties, Environment, and Quality Management Policies.
- **Sustainability Forum** – led by CIMIC, brings relevant Operating Company and HOCHTIEF sustainability leads together in a monthly forum, and focuses on sustainability strategy, policy, risk mitigation, controls, digitalisation, reporting, innovation and continuous improvement. Activities are guided by the Environment, Health and Safety, Diversity and Inclusion, Procurement, Risk Management and Sustainability Policies.
- **Diversity and Inclusion Forums** – are in place at relevant Operating Companies. They set strategy and review social performance in areas including gender equality, social inclusion, Indigenous and First Nations participation and local and national inclusion. Activities are guided by our full range of people policies including Diversity and Inclusion, Health and Safety, Recruitment and Professional Development.



Engineering and construction, CPB CONTRACTORS

GRIEVANCE AND REPORTING MECHANISM

Open communication is key to maintaining our Code of Conduct.

We encourage our employees, subcontractors and partners to voice their concerns should they come across any potentially unethical practices – including corruption, bribery, conflicts of interest and human rights infringements.

Our grievance and reporting mechanism is accessible, confidential and responsive.

Our Complaints and Investigation Procedure, Workplace Behaviour Policy, Privacy Policy and Whistleblower Policy are complementary. Together with our staff Whistleblower training and the confidential, independent 24/7 Ethics Line, they support our processes and approach to investigating, addressing and managing reports or complaints. This integrated approach encourages reporting and guides managers to execute an effective response.

Our Workplace Behaviour Policy outlines general standards of workplace behaviour and defines what behaviours are unacceptable in our workplaces including bullying, harassment, sexual harassment, hostile workplace environments, discrimination, victimisation, and vilification.

In accordance with the *Privacy Act 1988* (Cth), our Privacy Policy sets out our requirements to protect personal information by ensuring its confidentiality, maintaining security and respecting individual privacy.

Our Whistleblower Policy defines who is a whistleblower, how to make a disclosure, safeguards for confidentiality, anonymity, and personal information. It also outlines how whistleblowers are protected. Whistleblowers can remain anonymous, and disclosures may be referred to the authorised Business Conduct Representative (BCR)²⁴ who ensures that any disclosure is investigated appropriately, promptly and confidentially.

CIMIC and each Operating Company's BCR and Reportable Conduct Group (RCG), further support engagement, monitoring compliance and continuous improvement across the Group.

The Workplace Protection Officer is responsible for safeguarding the interests of any whistleblower within the organisation.

In 2025, the Group continued to embed staff e-learning modules that were enhanced in 2024, including our Code of Conduct, Workplace Behaviour & Equal Employment Opportunity, and Whistleblower training modules.



CIMIC Group's grievance and reporting mechanism. For more information go to [Ethics Line | Sustainability | CIMIC Group Limited](#).

PROCUREMENT

Our procurement framework is key to building and maintaining a reliable and trusted supply chain, and proactively identifying and managing risks throughout the term of each contract.

The framework provides policies, systems and processes to support supply chain management. Activities include identifying and assessing risks by conducting comprehensive vetting of subcontractors, suppliers and third parties engaged by our businesses.

As part of the framework, the Group's Third Parties Policy, Procurement Policy and Human Rights Procedure incorporate:

- the management of risks, including specific modern slavery due diligence risks and requirements, into our supplier registration (a business integrity check)
- the screening and onboarding process
- a suite of template commercial contract terms to be used wherever possible
- a set of requirements for suppliers' management of their suppliers.

²⁴ The Business Conduct Representative is a senior person within the Legal function who supports the operation of the Code of Conduct.



Supplier screening and onboarding

CIMIC has implemented an internationally recognised and externally provided due diligence tool to screen third parties for a range of risk factors – including the risk of modern slavery.

This tool's comprehensive evaluation leverages various global indices and databases, including but not limited to the Corruption Perception Index and the Global Slavery Index, watch lists (Politically Exposed Person (PEP) lists), databases and adverse media. The assessment includes but is not limited to risks relating to:

- legal status
- sanctions and enforcements
- adverse litigation
- country and industry risks
- modern slavery, bribery and corruption risks.

Based on a multi-factor risk assessment, each supplier is allocated a risk-rating which may trigger additional review and assessment, and then further investigation and due diligence where applicable. Identified risks may lead to the preparation of corrective action plans, imposition of conditions, or in some cases, the supplier may be rejected from working with CIMIC Group entities. Accepted suppliers and other third parties are subject to ongoing monitoring in the tool for any changes in key risks, for example a change in an entity's legal status or any watchlist changes.

Since implementing the third party screening tool, and as at December 2025, the CIMIC Group, including the Thiess Group, has risk assessed more than 52,000 third parties including suppliers.²⁵ Of these, 9,788 were risk assessed in 2025, and we onboarded approximately 3,842 new suppliers in the same year.

Supplementing supplier screening via the tool, as part of the supplier registration and pre-qualification process, our Operating Companies require suppliers to complete template supplier pre-qualification questionnaires.

Information provided via the questionnaire assists with informing our businesses of any potential vendor risks in areas such as health and safety, quality, financial risks, compliance, and relevant modern slavery and ESG factors.

Suppliers are required to comply with applicable law and the CIMIC Code of Conduct (or their own Code containing equivalent standards of behaviour), and to complete a Third Party Business Integrity Declaration Form confirming (among other things):

- no modern slavery, human trafficking or forced or unlawful child labour has been used anywhere by the third party or, to the best of the third party's knowledge, by any direct contractor or supplier to the third party
- they have not been subject to or received any prosecutions, regulatory notices, tendering restrictions, sanction notices, litigation or arbitration concerning allegations of fraud, bribery, corruption, environmental or safety breaches, modern slavery or human rights breaches or violations, or other unethical business practices by their employees or subcontractors and suppliers
- they have a compliance management program in place to ensure compliance with business integrity laws, regulations and standards.

Suppliers are also required to notify CIMIC if they become aware of any change to any of the matters which they have declared, including any behaviours or conduct within their operations or supply chain that are or may be inconsistent with the CIMIC Group Code of Conduct (or the supplier's own code, where applicable) or in contravention of any relevant laws, regulations or standards. They are also required to confirm they will not use any payments received from CIMIC in violation of modern slavery laws and regulations.

The Third Party Business Integrity Declaration Form is designed to promote a culture of integrity and compliance with the CIMIC Group Code of Conduct by our third parties.

We require suppliers engaged by the Group to complete this Declaration Form as part of onboarding.

²⁵ In addition to the approximately 49,000 suppliers and other third parties who have been accepted by CIMIC (including the Thiess Group), as at 31 December 2025 approximately 1,300 applications are pending and CIMIC has rejected approximately 1,500 applications on various grounds, which can include modern slavery. Approximately 200 have expired.

Template commercial contracts

Our Group Procurement Policy requires Operating Companies to engage suppliers using CIMIC Group's suite of template commercial contracts wherever possible. The suite includes a number of different forms of contract which can be utilised depending on the scope, location, value and complexity of the works or services to be provided, and the risk profile of the relevant project.

Our template commercial contracts include clauses that require suppliers to comply with the Group's Code of Conduct, ensuring alignment with the Group's expected behaviours. These clauses can be used in non-template commercial contracts where applicable.

The contracts also require suppliers to warrant that they have not been convicted of an offence relating to modern slavery, that they will not breach any modern slavery legislation and that they will comply with any requests of the Operating Companies to comply with all modern slavery legislation, including providing information and documents, and allowing interviews to be undertaken.

Indirect supplier controls

The number of indirect suppliers involved in our businesses is substantial. As a supply chain extends, influencing the behaviours and conduct of indirect suppliers is a greater challenge. By raising awareness, engaging ethical direct suppliers, obliging our supply chain to reject the use of modern slavery, and performing due diligence, we can gradually exert more influence.

Our contract templates require our direct suppliers to warrant that their own suppliers enable them to comply with obligations under the CIMIC engagement. Our direct suppliers must:

- ensure their own suppliers read, understand and comply with the CIMIC Code of Conduct which contains information relating to modern slavery
- allow the Operating Company to conduct an independent audit of indirect suppliers to ensure, amongst other things, that they are conducting their business in a proper manner and in accordance with applicable codes of conduct and generally accepted business ethics.

Efforts are ongoing to improve visibility of modern slavery risks throughout our supply chains, including in higher-risk geographies and sectors.

THIESS GROUP ENGAGES STAKEHOLDERS IN HUMAN RIGHTS RISK ASSESSMENT IN CAMBODIA

Applying human rights due diligence to embed responsible business practices

In 2025, the Thiess Group completed a Human Rights Risk Assessment (HRRRA) at its operations in Cambodia, leveraging the opportunity to reinforce shared understanding and continuous improvement in responsible business conduct.

The HRRRA involved practical, on-the-ground engagement across the operational chain, engaging diverse team members, including workers, supervisors and managers, as well as stakeholders by conducting interviews with a sample set of clients and suppliers.

Thiess Cambodia representatives prioritised understanding how workers experience their employment, including practices related to pay, recruitment, working hours, living conditions and access to grievance mechanisms. Engagement activities reinforced worker awareness of rights, speak up expectations, and the importance of respectful workplace behaviours.

This direct engagement approach encouraged confidence among workers to raise concerns, strengthened trust in supervision and management, and helped ensure employment practices are applied consistently and fairly.

The HRRRA findings also highlighted the site's strong procurement capability in driving and maintaining detailed documentation of items imported into Cambodia. This documentation approach supports lawful customs processes, reduces exposure to payment risks and promotes transparency across imported goods.

Consistent with the Thiess Group's approach to human rights due diligence, the HRRRA identified an opportunity to further strengthen communication and grievance mechanisms by establishing an additional Khmer-language grievance hotline. This was addressed through collaboration with operational leaders and the client, reinforcing a culture of continuous improvement.

For further information about CIMIC Group's Human Rights Risk Assessment program and the Thiess Group's HRRRA program, see Human Rights Risk Assessments, on page 38.

PEOPLE AND EMPLOYMENT

CIMIC Group focuses on creating a workplace culture which puts safety first and fosters our Principles of Integrity, Accountability, Innovation and Delivery. We invest in our people to build safe, fulfilling careers and foster a workplace culture grounded in respect, opportunity, and local impact. We are committed to supporting gender balance, increasing Indigenous participation and supplier engagement, and creating meaningful employment in the communities where we operate.

CIMIC Group respects the rights of employees to freely associate and collectively bargain in accordance with local laws. We aim to engage fairly, consultatively and constructively with workers, union representatives and regulators.

We treat personal information in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (APPs).

People policies

Our overarching People framework guides operations across our businesses, markets and geographies, facilitating compliance with, and often exceeding, local laws.

Policies and processes that help to build respectful, safe and inclusive work environments and to mitigate modern slavery risks include our:

- Diversity and Social Inclusion Policy
- Family and Domestic Violence Policy
- Flexible Working Policy
- Health and Safety Policy
- Human Rights Policy, Procedure and other supplementary tools
- Parental Leave Policy
- Recruitment Policy, procedures and management systems – with formal approval gates including verification of the candidate's identity and their right to legally work
- Redundancy Policy
- Remuneration Policy
- Whistleblower Policy
- Workplace Behaviour Policy.

Our Internal Audit team audits our Operating Companies' compliance with CIMIC Group policies.

SAFE RESPECTFUL WORKPLACES

Updating policies in step with evolving changes

CIMIC Group continually reviews and updates its framework of policies, processes and training programs to raise awareness of risks, support our people in meeting compliance requirements, and help them report any potential unethical practices.

Policy developments in 2025 included review and enhancement of our procurement and sustainability governance frameworks, introducing revised policies and procedures.

Our updated Third Parties Policy and new Third Parties Procedure govern how CIMIC Group companies engage with external parties. They outline processes to identify, assess and mitigate third-party risks before formal engagement, and to monitor and manage those risks throughout the relationship. These processes and measures reinforce our commitment to ethical business practices and risk management.

Our revised Sustainability Policy and new Sustainability Procedure support our Group's requirements, commitments and objectives for ESG, and align our approach with the broader ACS Group.

Under our Group Code of Conduct all CIMIC Group employees have a responsibility to take active steps to be aware of, understand, and comply with all Group policies and procedures and applicable laws and regulations.

Natural resources, THE THIESS GROUP

HUMAN RIGHTS RISK ASSESSMENTS (HRRRA)

Our Human Rights Risk Assessment (HRRRA) program, which commenced in 2017, is an annual assessment of select projects across our countries and industries of operation. The HRRRA program prioritises assessments in geographies where we have a significant workforce and/or where there are potential elevated risks.

The Thiess Group²⁶ has implemented its equivalent Human Rights Impact Assessment (HRIA) program since 2020; in 2024, it was renamed the Human Rights Risk Assessment program.

To date, CIMIC Group, including the Thiess Group, has carried out HRRAs/HRIAs in countries including Australia, Cambodia, Hong Kong, India, Indonesia, Malaysia, Mongolia, New Zealand, Papua New Guinea and the Philippines.

In 2025, CIMIC Group, including the Thiess Group, completed HRRAs in:

LOCATION	SECTOR	OPERATING COMPANY	INITIATED
Cambodia	Resources	Thiess Group	2024
New Zealand	Construction - Renewable energy	CPB Contractors	2024
Australia	Defence	UGL	2025
Australia	Transport	CPB Contractors	2025
China	Procurement office	Sedgman	2025
Hong Kong	Social infrastructure	Leighton Asia	2025
The Philippines	Transport	Leighton Asia	2025

In 2025, the Thiess Group initiated a HRRRA for their operations in Chile for completion in 2026. Further HRRAs will be completed in 2026 and will be reported in the next Joint Modern Slavery Statement.

Complementing our other due diligence processes, CIMIC Group's HRRAs extend our understanding of modern slavery risks and inform continuous improvement initiatives and opportunities in the different geographies and industries in which we operate.

²⁶ CIMIC Group acquired an additional 10% of the equity in Thiess Group Holdings Pty Limited from Elliott Advisors (UK) Ltd (Elliott) in April 2024. The acquisition increased CIMIC's ownership of the Thiess Group to 60%. Consequently, CIMIC has fully consolidated the Thiess Group's ESG information since 2024.



Natural resources, THE THIESS GROUP



CIMIC GROUP HUMAN RIGHTS RISK ASSESSMENT PROGRAM APPROACH

Managing a consistent, disciplined approach to assessing human rights

The self-assessment tool CIMIC Group uses to conduct Human Rights Risk Assessments (HRRRA) is based on the Human Rights Assessment Quick Check prepared by the Danish Institute for Human Rights (DIHR).

In 2025, we continued to apply the self-assessment tool, which was revised in 2024 to take into account more recent guidance, including guidance from the United Nations and the DIHR.

The tool assesses categories including governance and leadership, people management, health and safety, community engagement, security arrangements, country risks and procurement.

As part of this process, assessments consider compliance with our template employment contracts and review modern slavery indicators such as wages and benefits, working hours, employment criteria (such as age), freedom of association, health and safety, unlawful discrimination and worker accommodation.

Assessment steps, shown below, include engaging with leaders in each country, undertaking risk assessment and due diligence, conducting site visits and interviews, reporting findings, developing action plans and monitoring improvements.

1. **Research** – Conducting desktop research, data collection and analysis across:
 - applicable legal regulatory frameworks
 - governance instruments, including policies and standard operating procedures
 - workforce information, including workforce data, payroll, employment contracts, and training records
 - health and safety management, including Total Recordable Injury Frequency Rates, and incident records
 - client information
 - service providers, including labour hire contracts.
2. **Site visit** – Project site inspections involving observation of the workplace including offices, operational areas and accommodation facilities, together with interviews conducted with representative sample groups including:
 - operational functional leaders including human resources, legal and safety
 - potentially vulnerable employee groups
 - labour hire provider(s)
 - third party suppliers.
3. **Report** – Preparing a comprehensive report of findings, informed by desktop analysis and site-based observations and learnings.
4. **Outcomes** – Based on the findings and recommendations, development of action and monitoring plans with relevant Executive Leadership Team members where appropriate.



HUMAN RIGHTS RISK ASSESSMENT PROGRAM – RECENT FINDINGS

Highlights from human rights risks assessments in our diverse geographies and sectors

The scoping of the Group's Human Rights Risk Assessments (HRRAs) involves identifying the key geographical, environmental, and social characteristics of the project, including consideration of different impact areas and right-holder groups, such as the local communities, location, the workers and contractors, and the suppliers and procurement.

Findings from recent HRRAs have shown that each assessed project had taken a proactive approach in addressing priority risk areas relevant to its country and industry context, mitigating risks.

Examples of positive findings from the HRRRA interview sample sets showed that on relevant projects there was:

- an awareness of relevant policies, including the Group Code of Conduct
- confirmation that employees and subcontractors were aware of the grievance mechanisms and that they would feel comfortable raising any concerns using those mechanisms
- application of the Group's established procurement processes, including supplier onboarding and engagement
- employee awareness of the health and safety systems on site, including those used to report incidents, encouragement of a culture of safety and availability of appropriate Personal Protective Equipment

The HRRRA process also provides valuable input to inform continuous improvement considerations for the participating Operating Companies.

EDUCATION AND TRAINING

Our mission includes our intent to provide safe, rewarding and fulfilling careers for our people. On-the-job development is complemented with a range of learning experiences that build skills and technical capabilities and these are underpinned by our Principles and Code of Conduct. In 2025, we delivered more than 952,000 hours of training across the Group spanning multiple training courses. This was more than 23 hours per annum for each direct employee.

Education and training are integral to our compliance framework, and to engaging and upskilling our people in meeting their legal, regulatory and compliance responsibilities. We monitor, report and manage training completion rates through our Group's learning management system, including One Learning, and by using on-site project records.

Code of Conduct and other compliance training

Our mandatory staff Code of Conduct training and other compliance training cover our business conduct policies and support our people to recognise and report risks or potential unethical practices.

Code of Conduct training and related compliance training modules include the following topics:

- Acceptable workplace behaviours and equal opportunity
- Anti-bribery and corruption
- Anti-competitive conduct
- Communications with stakeholders
- Conflicts of interest
- Code of Conduct
- Cultural awareness
- Diversity and social inclusion
- Gifts and hospitality
- Health, safety and the environment
- Human rights
- Information and record management
- IT cyber security awareness
- Preventing and responding to sexual harassment in the workplace training for managers

- Privacy
- Recognising and responding to family and domestic violence
- Whistleblower legislation
- Working with third parties

The Code of Conduct training must be completed by employees within three months of commencement in a role (either as a new hire or by promotion to a relevant role) and then at least every two years thereafter.

In 2025, we embedded an additional Code of Conduct e-learning acknowledgement activity which was introduced in 2024. The module is required to be completed in the alternate year to the above-mentioned Code of Conduct training, ensuring team members refresh their understanding of the Code of Conduct annually.

In addition to the online module, all decision-makers in senior management, and staff considered to be in high-risk roles, are required to undertake an extensive face-to-face (where possible) training session. This is delivered by the CIMIC or Operating Company General Counsel or delegate and reiterates the importance of the Code of Conduct, across all key topics.

Depending on roles, some employees are also required to complete further specific training in particular subject areas, which can be face-to-face or online.

Human rights training

Supporting the governance framework, CIMIC Group staff are required to complete a standalone Human Rights e-learning course.

In 2024, we updated and expanded our Modern Slavery e-learning module to become a broader Human Rights training course.

This course builds upon our team's awareness and skills to identify and report human rights risks or concerns.

Communication resources and Group-wide alerts support the training, facilitating greater understanding of the issue and its importance to our business.



Graduate Program, CIMIC GROUP



5. 2025 ACTIONS

In 2025, a range of actions were taken to enhance our capabilities to identify, mitigate and prevent human rights and modern slavery risks across the Group's operations and supply chain, and respond should any impacts occur.

OPERATIONS

Governance and compliance

- Continued to review and update our governance framework, including policies and procedures, to align with changes in law and regulation, and evolving CIMIC processes and practices
- Continued to embed our Human Rights Policy and Procedure and associated tools
- Enhanced our understanding and knowledge of human rights and modern slavery risks, in collaboration with our Operating Companies, HOCHTIEF Australia and HOCHTIEF AG
- Continued to review, assess and understand the human rights risks for each Operating Company and the Group across our countries and industries of operation
- Submitted our 2024 Modern Slavery Statement to the Australian Government.

People and employment

Human Rights Risk Assessment

- Implemented our Human Rights Risk Assessment (HRRRA) tool which leverages best practice (including United Nations and Danish Institute of Human Rights guidance)
- Continued to conduct the Group's Human Rights Risk Assessment program, with assessments completed in 2025 in countries including Australia,

Cambodia, China, Hong Kong, New Zealand and the Philippines

- Completed seven HRRAs in 2025 with one more initiated in 2025 for completion in 2026

Training

- Delivered our ongoing Code of Conduct and broader compliance training program, supporting our people with Code of Conduct compliance and helping them to identify and report any potential unethical practices
- Embedded new and updated e-learning modules that were introduced in 2024 including Competition Compliance, Code of Conduct acknowledgement, Code of Conduct, Workplace Behaviour & Equal Employment Opportunity, and Whistleblower training
- Raised our people's capability to recognise and report human rights and modern slavery risks and their awareness of CIMIC's grievance mechanism via mandatory Human Rights training and other compliance training modules
- Continued to roll out Preventing and Responding to Sexual Harassment in the Workplace training modules across the Group - engaging approximately 330 employees
- Continued to implement Sexual Harassment Toolbox training across the Group - engaging approximately 600 wages employees.



Natural resources, THE THIESS GROUP

SUPPLY CHAIN

Governance and compliance

- Updated and enhanced our Third Parties Policy and introduced a new Third Parties Procedure for third party due diligence and risk assessment.

Procurement

- Onboarded approximately 3,800 new suppliers
- Conducted due diligence and risk assessed 100% of new suppliers, vendors and business partners using the externally provided third party screening tool. Any identified risk results were subject to further investigation and assessment, and if required, mitigation or corrective action plans were implemented. In some cases, the third party was rejected from being engaged by CIMIC Group entities.

Assessing effectiveness

Our assessment of effectiveness is evidence based and includes monitoring and analysing risk analysis and compliance assurance and internal audit results, supplier screening and risk assessment, monitoring and closeout of corrective action plans, training participation rates, communications engagement, Human Rights Risk Assessment results, the completion of improvement plans and responsiveness to grievances.

Quantitative data and regular qualitative reviews facilitated by our governance framework shape our annual planning process.

Key touch points which support our assessment and planning process include our:

- cross-Group engagement, including via our Human Rights Committee, Human Rights Coordinators and Compliance Working Group representatives (see section 4)
- risk analysis for our own operations and the supply chain (see section 3).



6. LOOKING AHEAD

2026 PRIORITIES

Over the next year, CIMIC Group will focus on continuing to:

- enhance our understanding and knowledge of human rights and modern slavery risks, in collaboration with our Operating Companies, HOCHTIEF Australia and HOCHTIEF AG
- reinforce our Human Rights Policy and Procedure and associated tools
- assess and develop the Human Rights Country Analysis having regard to the countries and industries in which our Operating Companies operate
- conduct the Group's Human Rights Risk Assessment program, with HRRAs to be completed in 2026 in countries including Chile, India and Indonesia
- review and update the Human Rights Action Plans for each Operating Company
- assess and update other human rights and modern slavery tools and controls where relevant
- review our approach to modern slavery risk management with reference to local and international developments
- risk assess new suppliers, vendors and business partners using the externally provided third party screening tool and, if necessary, develop and implement appropriate corrective actions plans and/or remediation measures
- monitor existing suppliers, vendors and business partners using the externally provided third party screening tool to identify, among other things, any breaches, fines or sanctions in relation to modern slavery and other ESG risks
- raise our people's capability to recognise and report human rights and modern slavery risks and their awareness of CIMIC's grievance mechanism via mandatory Human Rights training and other compliance training modules
- conduct our Human Rights monitoring, risk analysis, planning and reporting activities in collaboration with our Operating Companies, whilst continuing our ACS and HOCHTIEF Group-wide alignment process
- assess opportunities to enhance the efficacy and efficiency of our modern slavery risk management approach
- maintain a high level of corporate governance regarding human rights.



Engineering and construction. | LEIGHTON ASIA

ONGOING ENGAGEMENT AND COMMUNICATION

We will continue to engage with Government, industry, regulators, and other organisations to build awareness and understanding of human rights and modern slavery risks and work toward mitigation.

Engagement is a key input to our continuous focus on human rights and modern slavery risks and developing a trusted supply chain.

We value gaining and sharing insights with and from relevant organisations, including:

- Government and regulatory bodies in the different regions in which we operate – Our Legal and Compliance teams monitor for updates on the status of legislation and developments in the area of human rights and modern slavery.
- Australian Attorney-General's Department – Relevant resources are consulted where applicable to aid our understanding of or to obtain guidance in relation to modern slavery matters.
- Industry Associations – We value and consider guidance and recommendations provided by industry associations in the regions in which we operate. We hold memberships with multiple trade and industry organisations, at local, regional, national and international levels.
- External presentations, seminars or forums – Members of our People, Legal and Compliance teams attend and/or participate in external presentations, seminars or forums to improve their awareness of modern slavery and ESG risks and to embed learnings within the business.

APPENDIX

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of

HOCHTIEF AUSTRALIA HOLDINGS LIMITED ABN 17 103 181 675

as defined by the *Modern Slavery Act 2018* (Cth)²⁷ (“the Act”) on

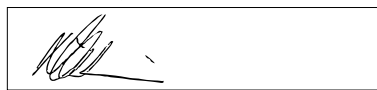
26 June 2026

Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of

HOCHTIEF AUSTRALIA HOLDINGS LIMITED ABN 17 103 181 675

as defined by the Act²⁸.



Mr David Robinson

Director of HOCHTIEF AUSTRALIA HOLDINGS LIMITED

Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

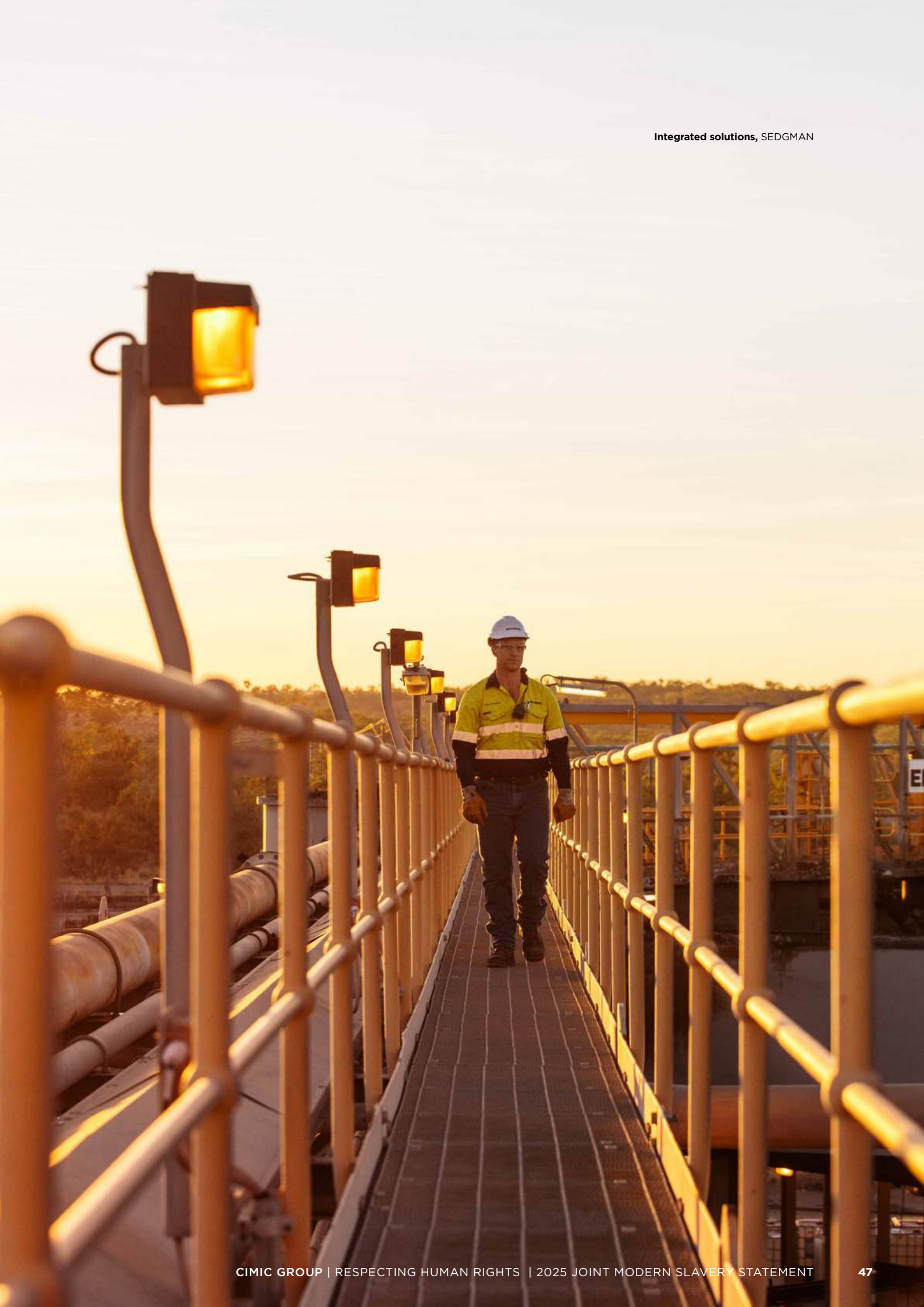
Mandatory criteria	Page number/s
a) Identify the reporting entity.	6-8
b) Describe the reporting entity's structure, operations and supply chains.	12-19
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	20-23
d) 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.	24-43
e) Describe how the reporting entity assesses the effectiveness of these actions.	43
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	9
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	11, 44-45

* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

** You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

27 Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

28 Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.





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