



Modern Slavery Statement 2025



Acknowledgement of Country

We acknowledge the Traditional Custodians of this land, and recognise their continuing connection to land, water and community. We pay our respects to Aboriginal and Torres Strait Islander cultures, and to Elders past, present and emerging.

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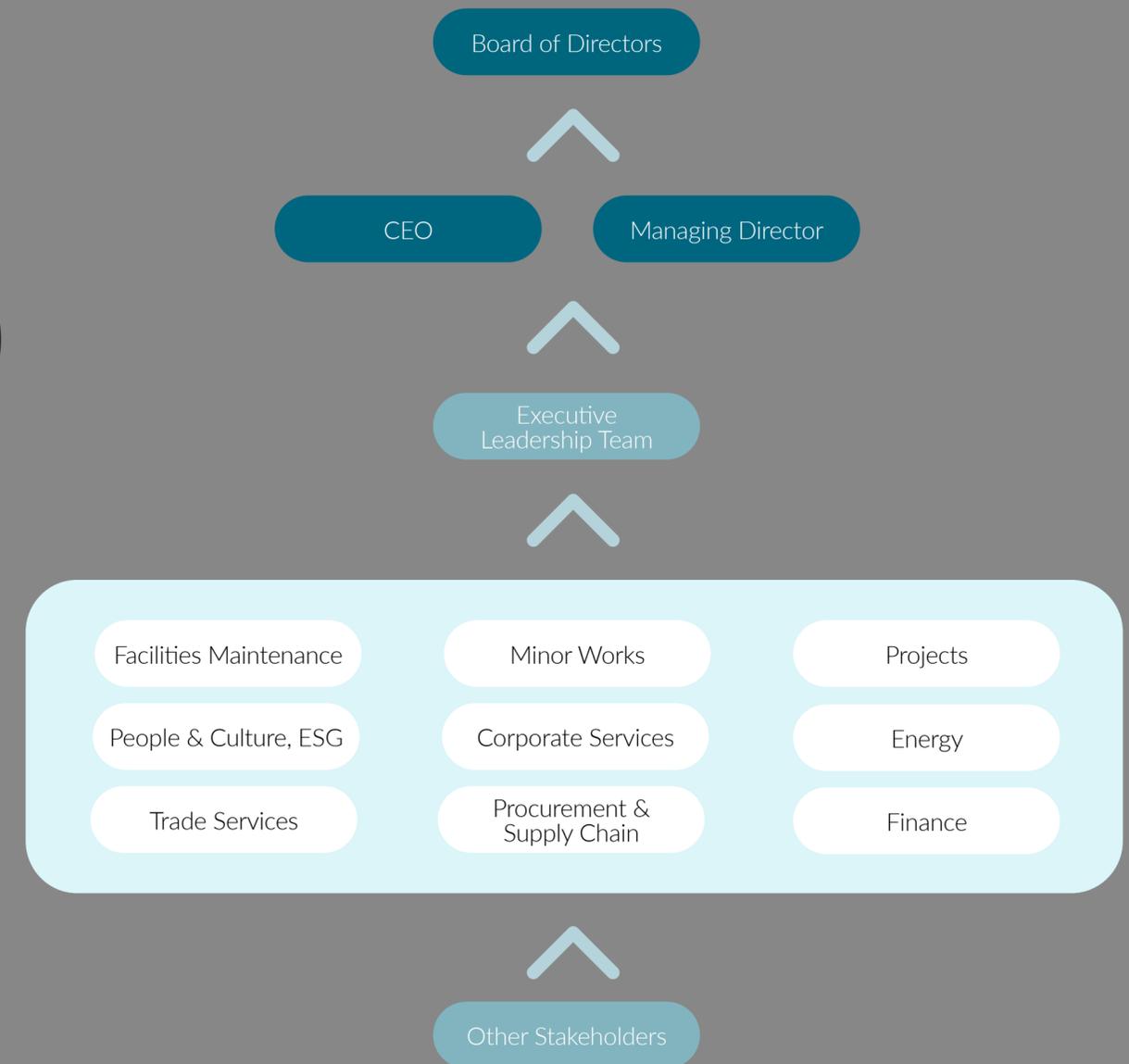
About this Statement

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) by Modus Projects Pty Ltd, ACN 143 167 159 ('Modus Projects'), and covers the financial year 1 July 2024 to 30 June 2025.

This statement sets out the steps that Modus Projects took during the reporting period to avoid and mitigate the risk of modern slavery taking place in our business and supply chain.

This statement was approved by the Board of Modus Projects.

Governance Structure



Modus Projects provides high-quality facilities maintenance services, building, construction and fit out, project management, and energy solutions - delivered by our skilled workforce and trusted network of suppliers throughout Australia.

400+
Employees

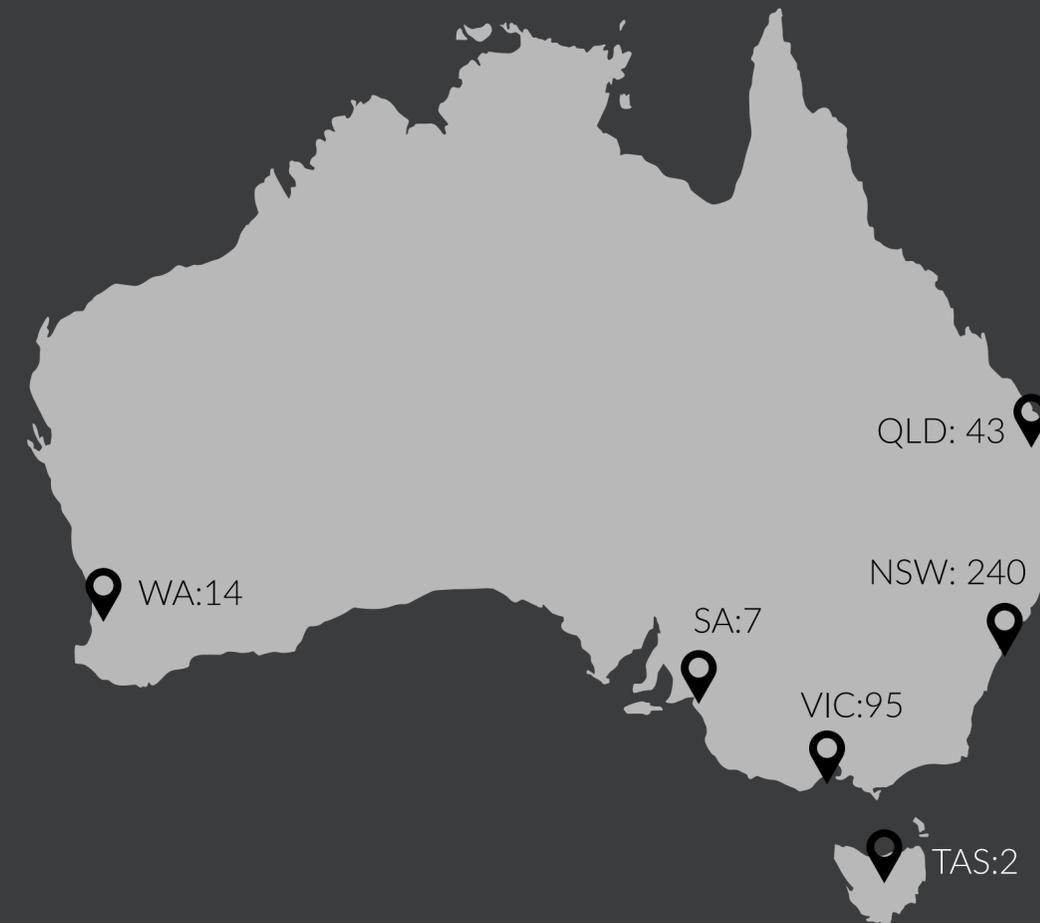
200+
Clients

3000+
Contractors

9000
Sites managed across Australia

About Us

We have over 400 employees, 3,000 contractors and suppliers, and serve clients across mobility and convenience, government, banking, retail, aged care, and education. With 15 branches nationwide, we provide integrated facilities maintenance services to approximately 9,000 sites across Australia, maintaining the highest standards of integrity, fairness, and respect in all our business practices.





Message from the CEO



Brad Berryman
CEO, Co-Founder

At Modus Projects, we adhere to the highest standards of integrity and accountability. We believe that any human rights violation contradicts the fundamental values we hold dear as a company. We maintain a zero-tolerance policy towards such practices and are fully committed to ensuring they have no place in our operations or supply chain.

I am pleased to present Modus Projects' third Modern Slavery Statement.

Recognising the construction industry as one of the most susceptible sectors to modern slavery, we are acutely aware of the significant responsibility we carry as key stakeholders. With people being the cornerstone of our business, we are committed to utilising all available means to safeguard and uphold their rights. In this reporting period, we have continued to develop and deploy modern slavery training across all our staff, which reflects our strong emphasis on staff awareness and capability in managing our activities consistent with our obligations to mitigate modern slavery risks in our business.

Our dedication to ethical business conduct extends comprehensively to how we interact with individuals within our organisation and throughout our supply chain. We require our suppliers to mirror our adherence to our ethical standards, and we actively collaborate with them to ensure that human rights are maintained at every stage of our operations. In this reporting period, we have continued to develop and implement robust supplier assessment and onboarding procedures to mitigate the risks of modern slavery in our supply chain.

We continue our commitment to leverage our platform and advocate for the eradication of modern slavery, not just within our industry but on a broader scale. We firmly believe that through collaborative efforts with our stakeholders, we can drive positive change and contribute to a future where modern slavery becomes a thing of the past.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brad Berryman'.

Brad Berryman

Chief Executive Officer



Our Policies

Our policies are the first step in our approach to addressing modern slavery. We have established a comprehensive suite of policies for internal and external use.

Our policies continue to be updated to reflect relevant circumstances and any changes in the climate in which we operate. All policies are easily accessible to our employees, and they are encouraged to speak up and ask any questions or concerns related to Modus' policies and procedures. To ensure compliance with the Modern Slavery Act 2018, we have implemented the following policies and procedures (See Table 1).

TABLE 1. Our policies related to Modern Slavery

Policy	Purpose
Code of Conduct	We maintain a comprehensive Code of Conduct that serves as a guiding framework for ethical conduct Code of within our organisation. We hold all employees accountable for adhering to this Code of Conduct, recognising that it is a shared responsibility to ensure a workplace that is free from any form of exploitation or human rights violations. To facilitate understanding and compliance, we provide regular training and awareness programs.
Whistleblower Policy	We established a robust reporting mechanism that allows employees, suppliers, and stakeholders to report any concerns or suspicions regarding modern slavery. We treat all reports seriously and undertake prompt investigations, taking appropriate action if any wrongdoing is identified. Our policy guarantees the protection of whistleblowers and ensures their anonymity, promoting a safe environment for reporting.
Diversity and Inclusion policy	At Modus, we value the unique contributions of each individual, recognising that diversity is integral to our success. We have fostered an inclusive corporate culture, actively promoting equal opportunities for employees of all backgrounds to thrive and belong. We oppose any discrimination based on any characteristic protected by law. Through proactive diversity outreach and merit-driven selection processes, we ensure a broad representation of perspectives and experiences exist within our workforce.
Human Rights and Modern Slavery Policy	The policy integrates human rights principles into policies, practices, and decision-making processes, complying with international and national standards. Key principles include zero tolerance for human rights violations, equitable remuneration, safe working conditions, and prohibiting forced labour. Steps are taken to mitigate modern slavery risks in the supply chain, and effective grievance mechanisms are maintained. Regular monitoring and reporting ensure compliance and continuous improvement.
Work Health & Safety policy	The policy outlines various procedural adaptations aimed at reducing workplace incidents and fostering a safe working environment. These include monthly trade management meetings, collaboration with return-to-work coordinators and insurers, monthly national audits, establishment of measurable objectives and targets for continuous improvement, and rotation of repetitive tasks among employees to minimise fatigue and injury risks.

Modus Projects has zero tolerance for all forms of modern slavery such as human trafficking, slavery, forced labour, servitude, debt bondage, deceptive recruiting for labour or services and child labour within our supply chain.



Internal audits are conducted regularly by our People and Culture and Finance team, to ensure ongoing legislation compliance pertaining to salary, hours worked, and safety.

Managing our Modern Slavery Risks

Recruitment and Fair Wages

Modus Projects prides itself on employing and retaining highly skilled employees and hiring of their own free will. At Modus Projects we believe in fair working conditions and embrace a respectful work environment. All Modus staff are employed under terms compliant with all Australian workforce legislation and applicable awards.

As part of our commitment Modus Projects continues to engage a top-tier professional services firm to undertake internal and external audits relating to our payroll and contingent workforce practices to understand any potential risks and further mitigate any current/future threats to the business. Modus deems its operations as having low to zero risk of exposure to Modern Slavery through recruitment processes including police checks, reference checks, validation of visas and working rights.



We recognise that modern slavery is a global issue and understand the importance of taking proactive steps to address it. Our commitment extends to respecting human rights and promoting ethical conduct throughout our organisation. We expect our service providers, suppliers, and contractors to share our commitment to act lawfully and ethically and to work to ensure that modern slavery is not taking place within its organisation or its supply chain.

Operations and Supply Chain

Over the reporting period, Modus Projects' supply chain and procurement team has transformed how we engage, onboard and monitor our suppliers nationally. The team oversees an integrated national supply network that supports all business units and ensures consistent standards, controls, and visibility across metropolitan, regional and remote locations.

Over the past year we have focused on fully embedding modern slavery considerations into the complete lifecycle of contractor management from initial prequalification and assessment, through to performance management, renewal, and ongoing compliance monitoring.

All new and existing contractors are subject to a strengthened pre-qualification and periodic review process that incorporates modern slavery risk screening as part of our commitment to minimising multi-tier contracting and identifying downstream labour risks. Contractors are to disclose any secondary subcontracting, and higher risk categories are actively monitored to improve visibility into lower tier suppliers.

Our risk management approach is reinforced through our Integrated Management System, certified to ISO 9001 (Quality), ISO 14001 (Environmental) and ISO 45001 (Occupational Health & Safety). These standards guide our contractor onboarding, performance review and supply chain governance processes. Modern slavery due diligence, minimum labour standards, incident reporting and remediation pathways are embedded into the same operational workflows used to manage quality, safety and environmental risks.

Modus Projects recognises that identifying and addressing modern slavery is an ongoing responsibility. Modern slavery risks can exist in any industry, including construction and facilities maintenance, and we remain committed to continually improving our systems, controls and visibility to protect vulnerable workers across our supply chain.

Operations and Supply Chain

Our indirect supply chain includes the manufacturers, producers, and upstream suppliers that provide the materials and products used by our subcontractors and trades. While Modus does not directly import goods, we recognise that many construction and facilities maintenance materials originate from global manufacturing markets where visibility of labour practices can be limited.

The construction supply chain is highly fragmented, and raw materials often pass through multiple tiers before reaching the Australian market. This reduces transparency and increases modern slavery risk, particularly for categories such as electrical components, HVAC equipment, steel, plumbing fixtures, PPE, and cleaning products. For this reason, our raw-materials supply chain is treated as a medium-risk category.

To manage this, Modus requires our Tier 1 suppliers and wholesalers to demonstrate how they assess and manage modern-slavery risks within their own supply chains. This includes providing evidence of due diligence processes, supplier vetting, ethical-sourcing commitments, and corrective-action procedures. We supplement our risk assessments using recognised resources such as the Walk Free Global Slavery Index, the Australian Government's Responsible Sourcing Toolkit, and industry-specific guidance from Infrastructure Australia and the Australian Border Force.

Our approach ensures that even where we do not have direct contractual relationships with upstream manufacturers, we maintain oversight by setting minimum expectations, requiring transparency from our direct suppliers, and integrating modern slavery considerations into procurement, onboarding, and contract management practices across the Modus supply chain.

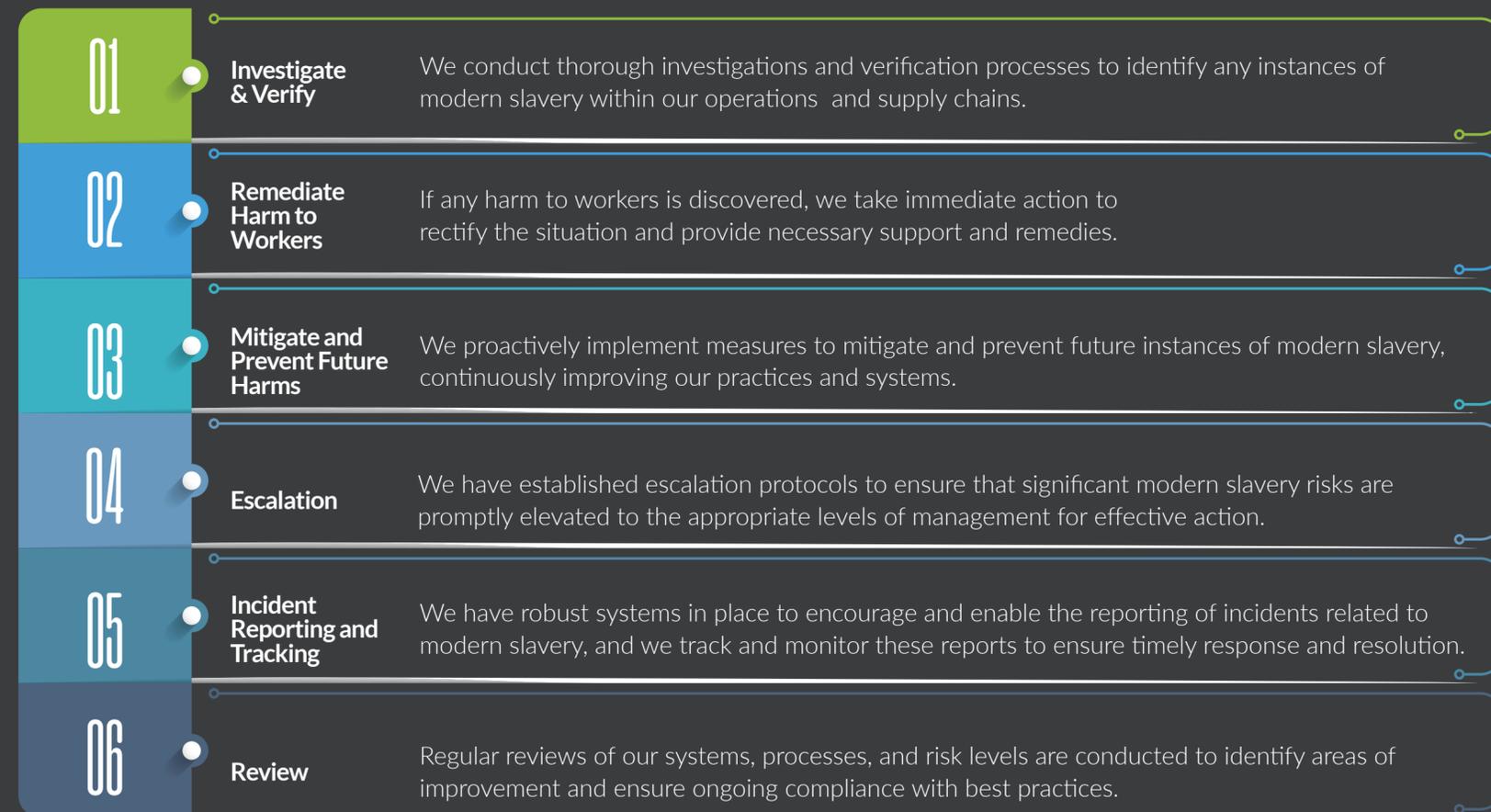




Due Diligence To Address Modern Slavery Risks

Recognising the vulnerabilities inherent in the construction business, it is imperative to identify pertinent issues and develop effective prevention strategies. We continuously monitor and review our policies, procedures and supply chains to ensure their effectiveness in eradicating modern slavery following our risk management framework which we adopted from the [Modern Slavery Response and Remedy Framework developed by Minderoo Foundation Walk Free:](#)

Figure 1. Modern Slavery Response and Remedy Framework

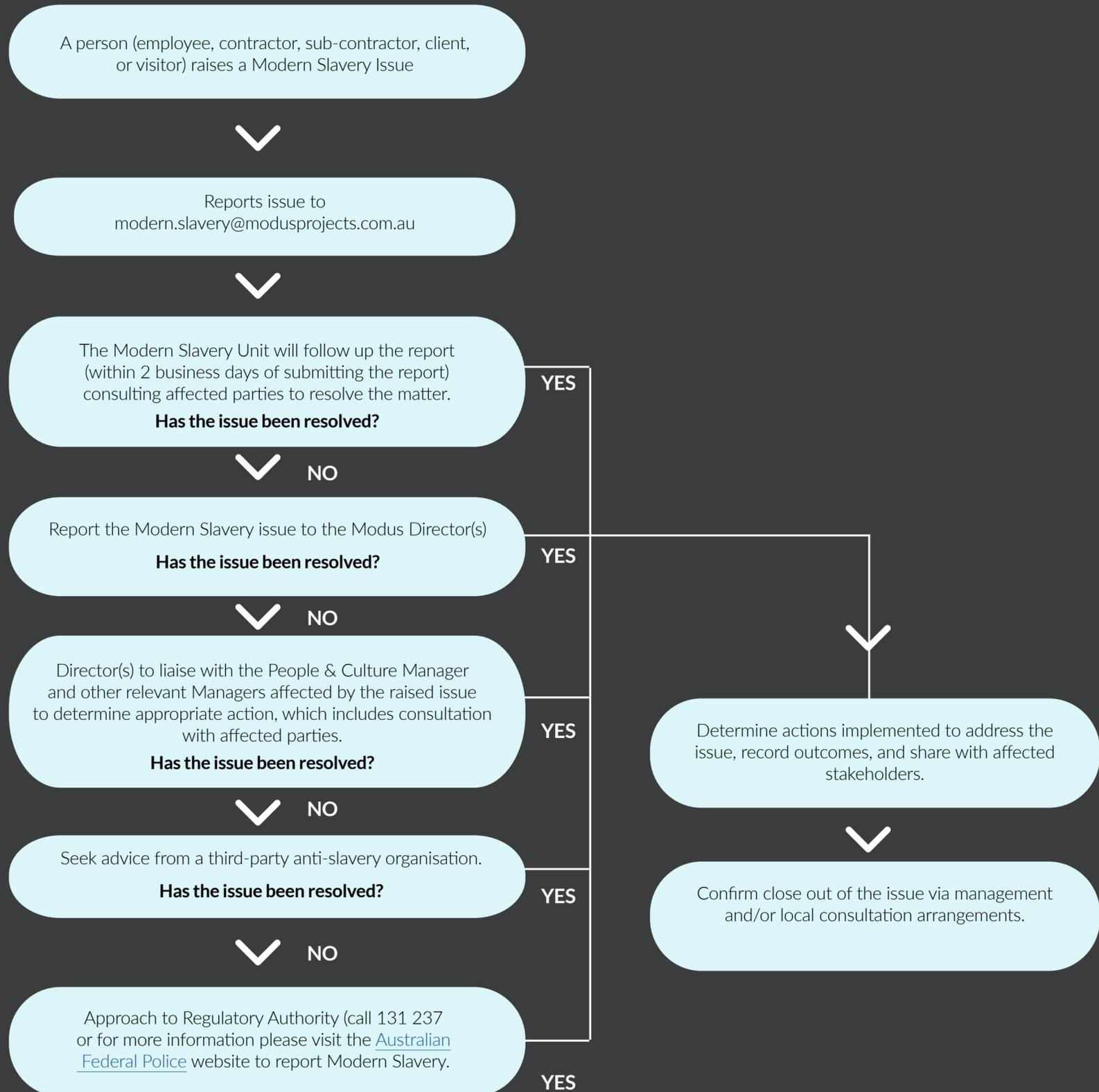


Consistent consultation, collaboration, and communication are integral to our approach. We actively engage with relevant stakeholders to review and determine the level of risk and to foster a shared responsibility in combating modern slavery. Moreover, we engage independent auditing services provided by professional firms to ensure compliance and minimise modern slavery risks to our business.



FIGURE 2. Modern Slavery Issue Resolution flowchart

To ensure the effective handling of any potential Modern Slavery issue, we have implemented a resolution flowchart that provides clear guidance for identifying and determining the appropriate course of action. If there is any instance of Modern Slavery associated with any aspect of Modus Projects' activities, we encourage individuals to use our ModernSlavery email address, where anyone can conveniently report such incidents.



Training

We acknowledge that everyone plays a key role in preventing modern slavery. Modus Projects raise awareness and promotes a better understanding of the circumstances in which modern slavery may occur within our industry. We provide training and capacity-building initiatives for our employees, suppliers, and stakeholders. This includes workshops and educational resources to raise awareness, improve understanding, and empower individuals to identify and respond to modern slavery risks. All employees are required to complete training annually on modern slavery. We foster a culture of reporting and vigilance among our employees, encouraging them to report any suspicions or concerns related to modern slavery. We provide channels for confidential reporting and ensure that all reports are promptly investigated, and appropriate actions are taken.

We measure the effectiveness of our training programs by incorporating feedback after every session to encourage our employees to be involved. Implement necessary changes and learn from past experiences to continuously enhance our approach to combating modern slavery.

Modus Projects has implemented a comprehensive Modern Slavery Training Program designed to educate our entire workforce. This initiative encompasses a diverse array of resources, such as interactive videos and engaging learning activities, aimed at fostering a deep understanding of modern slavery among our staff. We are pleased to report a significant uptake in participation, with over 90% of our workforce actively engaging in the program.





Our Progress and Commitments

Table 3. Progress and Commitments up to date

Commitment	Description	Progress
Strengthened Supplier Pre-Qualification for Modern Slavery Risk	Updated supplier questionnaires to assess labour hire practices, upstream supply-chain visibility, subcontractor use, and ethical-sourcing controls.	Achieved
Modern Slavery Requirements implemented in RFQs	RFQs now include mandatory MS declarations, disclosure of secondary subcontractors, and alignment to the Modus Supplier Code of Conduct.	Achieved
Improved Contractor Compliance Monitoring	Ensured contractors maintain current insurances, licences, and documentation to reduce exposure to unverified or informal labour channels.	Achieved
Removal of Non-Compliant or High-Risk Vendors	Cleaned the contractor database to remove suppliers lacking mandatory compliance, transparency, or MS documentation.	Achieved
Supplier Code of Conduct Enforcement	Reinforced ethical-sourcing and anti-modern-slavery requirements for all new suppliers during onboarding.	Ongoing
Internal Modern Slavery Training	Continued awareness training for procurement, FM operations, project supervisors, and coordinators on identifying MS red flags and reporting concerns.	Ongoing
Contractor Education on Modern Slavery Expectations	Ongoing communication to trade partners regarding MS obligations, subcontractor disclosure, ethical sourcing, and responsible labour practices.	Ongoing
Supply Chain Mapping & Tier-2 Visibility Work	Continued efforts to identify product origins, understand higher-risk material categories, and increase transparency within Tier 2 and Tier 3 supply chains.	Ongoing
Modern Slavery Grievance & Reporting Pathways	Maintaining confidential reporting channels for staff and suppliers, with continuous improvement of investigation and response processes.	Ongoing
Subcontracting and Policy template improvements for increased Modern Slavery Compliance	Introduction of updates to Supplier Code of Conduct, MS questionnaire, and all subcontractor contract templates to embed MS obligations through our supply chain.	Ongoing

At Modus, we are dedicated to continually refining our strategies to identify, assess, and combat modern slavery risks. Following, is a summary of the progress we have made on our commitments so far in a professional manner.



Modus is committed to maintaining a proactive and comprehensive approach to combating modern slavery through ongoing education, engagement, and communication with all stakeholders. We remain dedicated to continuously enhancing our practices, staying informed of emerging trends, and adapting our approach to ensure the highest level of effectiveness in our efforts.

Further Steps

We are committed to achieving ethical standards and acting with integrity in all business dealings and relationships, and where possible, to ensure modern slavery is not taking place in our own business or supply chain. We will continue to monitor and review our risk processes and effectiveness through improvements in results, low-risk levels, and non-compliances.

At Modus we continually challenge ourselves to improve our efforts to mitigate the risks of modern slavery by implementing:

Risk Assessment	We continue to conduct a comprehensive risk assessment across our operations and supply chains to identify potential areas of modern slavery risk. This assessment will include factors such as geographic locations, high-risk industries, and vulnerable worker populations.
Supplier Engagement	We continue to strengthen our engagement with suppliers to ensure their understanding and commitment to eradicating modern slavery. This includes incorporating modern slavery clauses in supplier contracts, supplier code of conduct, questionnaires, conducting supplier audits, and review sustainable and responsible resourcing methods.
Collaboration & Partnerships	We commit to actively collaborating with industry peers, trade associations, NGOs, and government bodies to share best practices, initiatives, and resources in the fight against modern slavery.
Reporting & Communication	We have developed a clear and transparent reporting mechanism to highlight modern slavery risks observed by our employees or suppliers. As well track progress, measure impact, and communicate these efforts to stakeholders as required. This includes regular reporting on key performance indicators, as well as the publication of an annual modern slavery statement.
Stakeholder Engagement	We will continue to engage with external stakeholders, including customers, investors, and civil society organisations, to understand their expectations, gather feedback, and collaborate on initiatives to combat modern slavery.

We recognise that eradicating modern slavery is a complex challenge that requires collaboration and ongoing effort from all stakeholders. Through our policies, procedures, and responsible business practices, we aim to contribute to a world where every individual is treated with dignity, respect, and fairness. Our modern slavery statement will be reviewed annually and published on our website to demonstrate our transparency and commitment to combating modern slavery.



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