

Built on trust.
Driven by community.



Modern Slavery Statement FY25



Joss

“ We will not tolerate any forms of Modern Slavery in our direct business activities and will work with our subcontractors and suppliers to identify and address instances of Modern Slavery that may exist in the construction and infrastructure supply chains ”

- Extract from the Joss Modern Slavery Policy Statement

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Structure, Operations and Supply Chains

Colin Joss and Co Pty Limited (“Joss”) is a family-owned company headquartered in Albury, NSW. Established as a partnership in 1975 and incorporated in 1988, Joss has spent five decades servicing clients across New South Wales, Victoria, and the Australian Capital Territory, earning recognition as one of regional Australia’s premier service providers.

The Company’s success stems from its reputation as a trusted, experienced contractor capable of managing complex and demanding projects. To meet evolving industry and client needs, Joss operates through three specialised divisions: Joss Construction, Joss Facility Management, and Joss Cleaning Services, each leveraging the distinct expertise of its workforce to deliver construction projects, maintenance services, and professional cleaning solutions.

Joss maintains its head office, depot and workshop in Albury, supported by 11 regional offices throughout NSW and the ACT. In the 2022/2023 financial year, a parent entity wholly owned by the Joss family was established to oversee operations, with all trading conducted through the company and all staff directly employed by it. The company operates independently without subsidiaries or control over any other entities.

2,634
Total
Employees

1,638
Female
Employees

254
Indigenous
Employees

214
Employees
with a disability



Joss Construction

Joss' Commercial Construction, Civil and Infrastructure division delivers diverse projects spanning commercial and industrial buildings, educational facilities, sporting venues, healthcare infrastructure, residential developments, building refurbishments, road construction, water treatment plants, and essential services infrastructure. The division's client base includes federal, state and local government agencies, as well as private sector organisations.

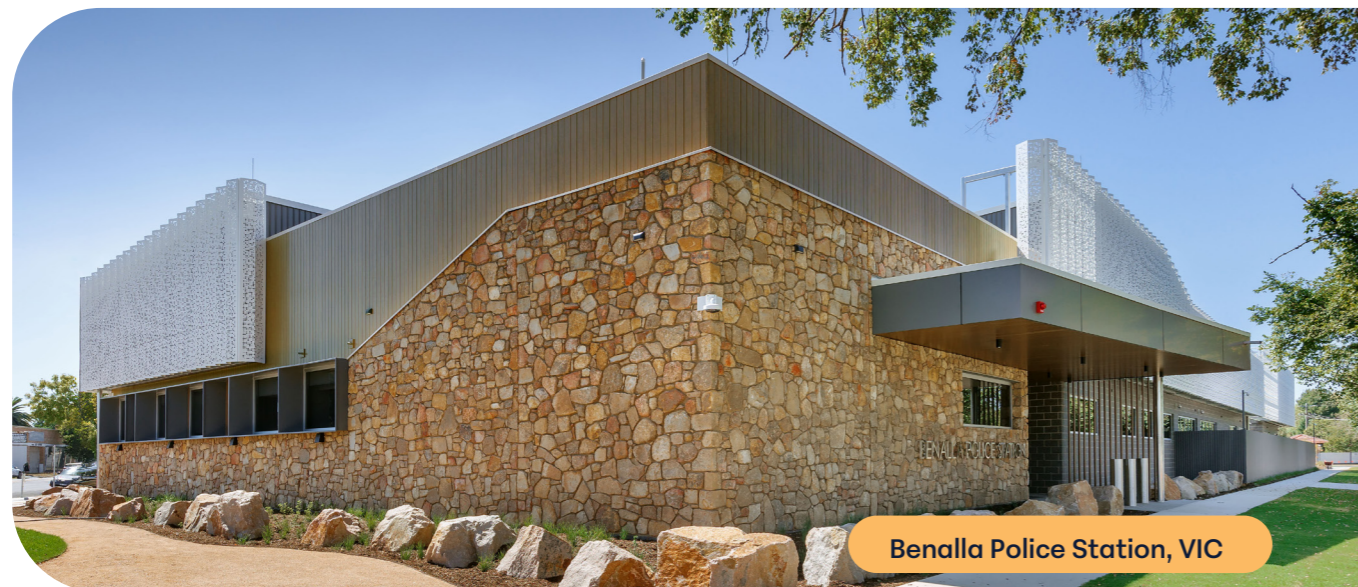
The division maintains a permanent workforce of qualified and experienced professionals who plan, coordinate and manage subcontractors across various procurement models,

including Managing Contractor, Lump Sum, Early Contractor Involvement, Design and Construct, and Design Construct and Manage arrangements.

The Construction division's supply chain comprises four primary categories: consultants who provide design and specialist advisory services, subcontractors who execute works under Joss' management, material suppliers who furnish construction products and equipment, and indirect suppliers who support project delivery and operational needs.

14 Projects completed during the period

1,450 Construction Subcontractors & Suppliers



Joss Facility Management

Joss' Facility Management division was originally established to service NSW Government facilities and has since expanded its portfolio to include planned and reactive maintenance, cleaning services, refurbishment projects, and smaller-scale construction works for government agencies at all levels and private sector clients.

Over 27 years of operation, the division has developed a network of approximately 2,100 prequalified subcontractors operating across New South Wales, Victoria and the Australian Capital Territory. The Company coordinates, supervises, and manages these subcontractors to deliver maintenance and servicing works throughout these jurisdictions.

The Facility Management division's supply chain encompasses three main categories: subcontractors who perform works under Joss' supervision, material suppliers who provide necessary goods and equipment, and indirect suppliers who support operational requirements.

The division's cleaning operations differ from its asset maintenance activities in that cleaning services are delivered primarily through directly employed staff. Specialist subcontractors are engaged only for complex or periodic tasks that require specialised expertise or equipment.

3045 Total properties serviced

2,137 Facility Management Subcontractors & Suppliers



Risks of Modern Slavery in the Operations and Supply Chains

During the FY25 we continued to assess our Operations, Subcontractors and Suppliers utilising various approaches to match the type, volume and risk of each element.

Operations

Risk Assessment Overview

Joss has maintained its low-risk assessment for Modern Slavery within our operations, consistent with the previous financial year. Our scope of operations has remained unchanged during this period.

Assessment Methodology

Our People & Culture team conducts an annual documented assessment using an internally developed evaluation tool. This assessment examines key risk areas including:

- Child Labour
- Forced Labour
- Bonded Labour
- Human Trafficking
- Employment Conditions
- Grievance and Redress Mechanisms

Supporting Evidence for Low-Risk Determination

Our low-risk rating is reinforced through multiple layers of oversight and accountability:

Internal Controls

Our qualified people and culture team maintains robust employment policies and procedures that ensure compliance with all legally mandated employment conditions and awards. These systems are continuously monitored and developed to meet workforce needs.

We conduct multi-layered site inspections involving senior management, Site Managers/ Supervisors, and HSEQ personnel. External health and safety consultants are also periodically engaged to provide independent reviews of our sites, systems, and practices.

External Verification

The nature of our work subjects Joss to regular external scrutiny of workplace practices and employment arrangements, including:

- State and territory prequalification scheme audits
- Third-party surveillance audits of our Certified Management Systems by Intertek SAI Global
- Client-initiated audits
- NSW Code Compliance Unit visits
- ACT Secure Local Jobs Code Certification requirements and audits
- ASIC-required annual financial audits
- Victorian Labour Hire Authority requirements (licence required by all Cleaning Contractors)
- Periodic state government payroll tax audits

Worker Engagement and Protection

For over twenty years, we have prioritised consultation as a tool for identifying issues, gathering feedback, sharing information, and pursuing improvements. Our Consultation Committee, comprised of elected Health and Safety Representatives from various workgroups, works alongside documented Grievance Procedures to provide workers with both direct and anonymous reporting channels.

These established practices collectively monitor for common indicators of modern slavery and strengthen our protective framework.

Supply Chains

Joss continued employing multiple strategies to assess, monitor, and educate our supply chains during the reporting period. Among these strategies, Modern Slavery Surveys were distributed to subcontractors and suppliers engaged for goods or services exceeding \$50,000 in value, where they had not previously completed a survey. This approach resulted in 81 completed surveys in FY25. This lower figure reflects the comprehensive surveying undertaken in previous years, with many in our supply chain having already participated in the program within the last three years.

Survey findings for the period identified:

- Only two of the businesses in the assessed supply chain were subject to the Modern Slavery Legislation and only seven others have a turnover greater than \$50M p/a. These numbers reflect our efforts to support Small and Medium Enterprises (SME's).
- 2,986 workers were employed by those assessed.
- Although quite a few businesses had accreditations and certifications in various schemes and standards, none of them related to responsible sourcing.
- 38 businesses (47%) had a documented policy, process or other commitment to eliminate Modern Slavery, this was an increase of 7% over the previous year's figures.
- Only 16 businesses (less than 20%) had undertaken any form of modern slavery training, despite details of free available resources being provided by Joss. Again, despite this figure remaining low, it is an increase on previous years.
- 43 (more than 50%) of businesses were aware they were utilising imported materials, however less than 50% knew where they came from.

- Materials or products were being imported by 13 businesses directly, representing a 50% decrease over last year's survey results.
- Common imported materials included steel, electrical equipment, solar panels, lift equipment, flooring products (timber, carpet and vinyl), door and window furniture, ceramic tiles, fabric finishes, shade cloth, fittings and sealants.
- The most recurrent countries listed where products were sourced from overseas included China, Germany, USA, New Zealand, Italy, India, Europe, France, Malaysia and Japan.
- 100% of businesses confirmed that if modern slavery was identified or suspected in an overseas supply chain, they would look at phasing to alternative suppliers/ products to assist in eliminating Modern Slavery.

As highlighted in the Global Slavery Index 2023, Australia imports US\$17.4 billion worth of at-risk products annually, with the construction industry contributing through imports of electronics, garments, and textiles (three of the top five at-risk categories), along with timber (ranked sixth) and other at-risk materials.

Analysis of these surveys, alongside data gathered over the previous five years and external information sources including the Global Slavery Index 2023, indicates that Joss does have potential exposure to modern slavery risks within our supply chains. This exposure stems from both our engagement of subcontractors and consultants, and our procurement of various goods and materials such as plant, equipment, vehicles, electronics, consumables, and building materials.





Case Study 1

Materials Supplied and Installed by Subcontractors

To better understand modern slavery risks within our supply chains, Joss conducted a detailed investigation into common materials supplied and installed by subcontractors on our construction projects.

The following analysis examines three material categories where concerns have been raised regarding overseas manufacturing and potential modern slavery risks in supply chains.

Bricks

The Global Slavery Index 2023 specifically highlights concerns around international extraction and production of raw materials for the construction industry, with additional research raising concerns about overseas brick manufacturing. In response, Joss reviewed our brick procurement practices during the reporting period.

Of the 14 construction projects completed during the year, along with ongoing projects, none utilised imported bricks. Our Facility Management division undertook repairs and extensions using locally sourced Australian bricks to match existing structures. While some architects and clients have occasionally specified imported bricks, this remains uncommon in our experience.

Laminates and Decorative Surfaces

Following responses from joinery firms indicating imported materials in Modern Slavery surveys, Joss investigated laminate and decorative surface specifications. Major Australian brands such as Laminex and Polytec manufacture most products locally, though other specialty laminates and decorative surfaces are imported from Asia (Malaysia, China) and Europe. The industry comprises predominantly local manufacturing supplemented by imported specialty products.

Pre-manufactured Wood Panelling

Joss recently became aware of pre-made timber panels marketed as featuring Australian hardwoods. Further investigation revealed that Australian hardwoods were being shipped to Turkey for panel manufacturing before being returned to Australia for retail sale. The cost per cubic metre was lower than equivalent unfinished individual hardwood lengths available through the same retailer. While Joss has not encountered these products in our commercial projects, their increasing prevalence in the domestic market highlights a concerning gap in modern slavery awareness among builders, trades and clients.

This investigation reinforces the importance of supply chain transparency and awareness of modern slavery risks in construction materials. As part of our Modern Slavery procedures, when external design teams and clients specify imported materials that present potential modern slavery risks, Joss proactively identifies these concerns and advocates for locally manufactured alternatives. This approach not only reduces modern slavery risks, but also supports Australian manufacturing and provides greater supply chain visibility.

Supply Chains (cont.)

Subcontractors and Consultants

This year marked the fifth year of supply chain mapping through Modern Slavery Surveys. Given the nature of our operations – pricing and delivering diverse projects and maintenance tasks across NSW, Victoria and the ACT – Joss continuously engages different subcontractors, creating a constantly evolving supply chain. Our assessment strategy initially evaluated 50% of subcontractors by value in the first twelve months, then shifted to assessing subcontractors who had not been previously surveyed or whose last assessment exceeded three years, where subcontracts exceeded \$50,000. While this approach has limitations, it provides a practical framework for monitoring a dynamic supply chain.

Data collected in FY25 remains consistent with previous years. We predominantly engage Small and Medium Enterprises (SMEs) operating in regional areas. For many of these businesses, our modern slavery surveys and the resources referenced within them represent their first exposure to modern slavery concepts and reporting protocols in Australia and internationally.

During the past twelve months, only seven subcontractors working for Joss had not completed a survey within the previous three years. Given this limited dataset, we determined it more appropriate to include this evolution data in next year's assessment, which already includes a significant number of secondary assessments.

Industry Context and Risk Multipliers

Previous Joss Statements have highlighted how COVID-19 and ongoing global conflicts have impacted our industry through disruptions to manufacturing and distribution. The Global Slavery Index 2023 identifies these international events as risk multipliers affecting employment, education, migration patterns, rule of law, and social support networks. While survey results confirm growing awareness and efforts by businesses to source locally manufactured products and materials, success in this area remains limited.

Australia's housing shortage has emerged as another significant industry influence in recent years, creating intense competition for skilled tradespeople. Domestic homeowners, often willing to pay premium rates to secure workers, have drawn many experienced, legitimate trades away from commercial and government projects where rates are typically lower and contractually fixed. This labour shortage in the domestic market has created opportunities for exploitation. Homeowners desperate to secure available tradespeople may be less likely to question workers' employment conditions, licensing, or pay arrangements. Unlike commercial projects – which feature regular site inspections, audits, and compliance checks – domestic construction typically operates with minimal oversight. This lack of scrutiny creates an environment where modern slavery risks can flourish, with vulnerable workers, including migrants, potentially exploited through underpayment, excessive hours, or unsafe conditions with limited detection risk. Workers may experience wage withholding or work without proper award entitlements. While commercial contractors like Joss, operate under strict employment frameworks with multiple compliance safeguards, the booming residential sector may inadvertently harbor exploitative labour practices that would be quickly identified and addressed in more regulated commercial environments.

Monitoring and Risk Recognition

Joss continues monitoring insurance arrangements and declarations relating to wages and entitlements. Supervision on our sites and structured inspections provide assurance regarding the appropriate treatment of subcontract workers by their employers.

Consequently, while the possibility remains low, Joss recognises that potential exists for practices that may lead to modern slavery within the subcontractors we engage and their supply chains.

Goods and Materials

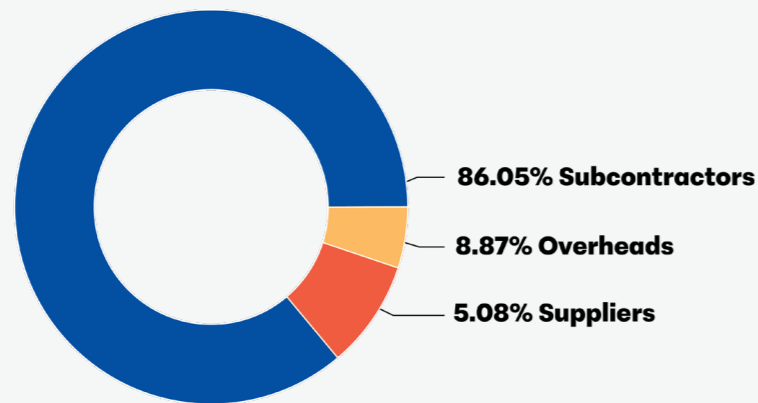
As a tier two contractor, Joss' direct procurement of goods and materials is limited, accounting for approximately 5% of total expenditure. Our primary direct purchases include vehicles, small plant and equipment, cleaning consumables, and IT equipment, with uniforms and apparel comprising a smaller portion of this spend. This procurement model differs significantly from tier one contractors who directly source major construction elements for their projects.

While Joss operates as a building and maintenance contractor utilising substantial quantities of building materials, plant and equipment, the majority of these resources are procured by our subcontractors, rather than directly by us. This creates secondary and tertiary layers within our supply chain

that warrant careful consideration. Surveys conducted with our immediate subcontractors and suppliers have confirmed their use of imported materials. While we have not identified specific instances of modern slavery, we recognise that the complexity and depth of these supply chains create potential risks that cannot be dismissed.

Joss acknowledges that the three main manufacturers of our directly procured IT equipment (Hewlett Packard, Apple, and Samsung) have each publicly recognised modern slavery risks within their respective supply chains. We will continue to monitor their mitigation strategies and the effectiveness of measures implemented to address these risks.

Supply Chain Overview



Case Study 2
Employment Practices and Worker Protections
Joss Cleaning Divison

Within Australian modern slavery awareness materials and statistical data, the cleaning industry is frequently identified as High Risk. Given the universal demand for cleaning services across all workplaces and in domestic settings, combined with the nature of the work and perceptions of low skill requirements, there are undoubtedly employers and clients exploiting workers in this sector.

As a cleaning service provider to the NSW Government and numerous private clients, Joss employs more than 2,000 cleaners across NSW. All cleaning staff are employed under the Cleaning Services Award 2020.

Employee Profile: Regional Cleaner 'Jan'

Jan has been employed by Joss in a medium-sized regional town for over seven years. Initially engaged as a casual cleaner supporting a team of Joss employees, Jan's hours gradually increased as staff retired. When offered the opportunity to transition to full-time employment, Jan accepted.

Jan's workday begins at 5am alongside two other Joss employees, with her shift concluding at 8:30am in accordance with client requirements. She then works at a second government site where the client offers greater flexibility. Joss, the client, and Jan collaboratively established a roster that accommodates all parties, enabling Jan to complete her work before 3pm each day.

As a full-time employee, Jan receives a range of entitlements under the Cleaning Services Award 2020. Because she starts work before 6am, Jan receives out-of-hours loading, which applies to both of her shifts on those days. She also receives a toilet cleaning allowance when performing bathroom cleaning duties, and split shift loading due to the break between her two work locations. Jan is entitled to rostered days off (RDOs), annual leave, personal/sick leave, and domestic violence leave, along with all other standard award entitlements. The hours Jan is required to work are determined for Joss by government departments based on the size of areas to be cleaned and average productivity rates.

Building Positive Workplace Culture

Recognising that cleaning staff may often be overlooked and that cleaners face negative perceptions in the broader community, Joss has implemented significant initiatives to acknowledge our staff's contributions and foster a positive team culture built on pride in our work. These initiatives include:

- In-house injury management for both work-related and non-work-related injuries
- Birthday recognition
- Breakfast BBQs and morning teas with client staff to foster site integration
- Years of Service recognition through presentation of service pins, promoted via newsletters and social media
- Access to company-wide competitions for all staff, including activities for children and grandchildren
- Access to Nationally Recognised Training for all cleaners
- Access to Employee Benefits including an Employee Assistance Program
- State-wide functions celebrating Christmas and other Company milestones, with all cleaners invited to participate.

Actions taken to assess and address these risks

During the year, Joss continued implementing our modern slavery risk assessment processes. The Modern Slavery Advisory Consultation Group noted limited opportunities for immediate procedural improvements beyond advocating for consolidated industry approaches and encouraging design teams to take greater ownership in avoiding materials with potential modern slavery risks. The Group observed that as more subcontractors complete their second round of surveys during this period and the coming year, we will be better positioned to assess our approach's effectiveness and refine future strategies.

The Joss People & Culture Department completed the required documented internal assessment of employment practices. Neither this Assessment, nor the various site inspections and audits conducted as part of our regular systems monitoring, identified any issues.

All new staff appointed to supervisory or procurement positions received Modern Slavery training, and existing personnel completed refresher training at the intervals

specified in our Training Matrix. The Company's foundational 'Modern Slavery Awareness' training will be updated and refreshed in the coming period as part of our commitment to maintaining current and engaging training material.

Following their review of established procedures, the Modern Slavery Consultation Group confirmed that implemented controls appropriately reflect each division's specific requirements while remaining proportional to operational needs. This assessment considered several operational constraints:

- Construction locations and project requirements that vary over time
- The labour-intensive character of Facility Management and Cleaning operations
- Contractual 'like with like' or 'deemed to comply' specifications in existing Facility Maintenance agreements

Divisional Implementation

Construction and Civil

All subcontracts and purchase orders exceeding a set threshold undergo assessment (with reassessment where necessary), receive risk ratings and based on those ratings, either proceed, are escalated for additional review, or trigger identification of alternative options that eliminate or reduce modern slavery risk.

Facility Management

Given the labour-intensive nature of these operations, Joss employs a comprehensive prequalification process integrated with contractual requirements, declarations, site inspections, toolbox talks, and systematic audits to monitor operations and identify potential modern slavery concerns.

Joss Cleaning

With operations primarily conducted by in-house staff and limited engagement of specialist subcontractors (including working at heights specialists and electricians for equipment testing and repairs), this Division employs multiple monitoring mechanisms: Modern Slavery Surveys and Statements, onsite monitoring activities, visits to supplier and subcontractor facilities, and formal declarations to both identify and track modern slavery risks.

The Effectiveness of these Actions

Actions undertaken by Joss during FY25 have advanced awareness and commitment to sustainable procurement practices within our operations and supply chains. While survey completion numbers increased during the year, fewer secondary surveys were completed compared to the previous period, limiting our ability to accurately assess improvement trends. However, with several major projects and contracts commencing just beyond the reporting period, we anticipate next year's analysis will reveal clearer patterns of progress.

Input from our Modern Slavery Consultation Group and supply chain partners directly informed the development of this year's initial KPIs.

FY25 Milestones and Achievements

Joss maintains established milestones and KPIs within our Modern Slavery strategy to monitor and measure the effectiveness of implemented actions and initiatives. All milestones for FY25 were successfully achieved:

- Enhanced the online Modern Slavery Survey portal to improve user experience, reducing email submissions and enabling more efficient data collation and evaluation
- Conducted an internal workshop with administrative personnel across all operational teams, equipping them to support subcontractors and suppliers in accessing the portal and completing surveys
- Engaged with clients to assess their commitment to reducing modern slavery risks within their procurement processes
- Delivered Modern Slavery Awareness training to all new employees potentially involved in procurement activities, as part of standard induction procedures
- Completed the documented annual internal Modern Slavery Assessment and embedded monitoring protocols within routine inspections and audits
- Analysed data obtained from subcontractors and suppliers to inform engagement and procurement decision-making

Industry Engagement and Future Direction

Despite resistance to expanding the role of designers and consultants in material selection and product specification, Joss' advocacy has raised awareness among consultants and their representative bodies. Whether this awareness translates into meaningful industry change in coming years remains to be seen.

The ongoing lack of cohesion within our industries remains a significant challenge. Fragmented individual efforts limit collective impact, whereas pooling resources and operating under unified industry standards would concentrate investment and pressure on high-risk supply chain elements, substantially accelerating improvements currently observed at the level of reporting entities.

For FY26, Joss will continue implementing actions, reporting against established milestones and KPIs, and identifying further initiatives for disclosure in future Modern Slavery Statements.

Approval

This Statement was approved by the Joss Board on 16th December 2025.



Paul Joss
Managing Director
17th December 2025



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