

# MODERN SLAVERY STATEMENT

1 July 2024 to 30 June 2025

An abstract graphic consisting of a network of white dots connected by thin white lines, set against a red background. The dots and lines are scattered across the page, creating a sense of connectivity and complexity.

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## **Acknowledgement of Country**

In the spirit of reconciliation, Gamuda acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea and community.

We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples with us today.

# MODERN SLAVERY STATEMENT

## About this Statement

This Statement sets the position and actions taken by Gamuda (collectively Gamuda (Australia) Branch ABN 27 632 738 768 and Gamuda Engineering Pty Ltd ABN 36 636 433 522 and Gamuda Holdings Pty Ltd ABN 81 665 763 020) in relation to modern slavery risks in Gamuda's business and supply chains in the year ending 2025, pursuant to the requirements of the Modern Slavery Act 2018 (Cth).

This Statement covers the reporting period 1 July 2024 to 30 June 2025 and has been prepared to meet the mandatory criteria structure as outlined in the Guidance for Reporting Entities: Commonwealth Modern Slavery Act 2018.

This Statement does not apply to Gamuda's non-controlled joint ventures, nor does it apply to entities in which Gamuda has an interest but are required to report in their own right under the Act, such as DT Infrastructure.

In preparing this Statement, members of Gamuda's Senior Leadership Team, including the Chief Executive Officer, Head of Procurement, Head of Human Resources, General Counsel, and Head of Environment and Sustainability were actively engaged and consulted as were the relevant business units.

This was undertaken by (i) collaborating with the relevant business units, entities and boards to provide an overview of the Modern Slavery Act 2018's reporting requirements, (ii) providing information regarding the actions we intend to take to address these requirements, including relevant updates, and (iii) seeking feedback from relevant business units, entities and the Management Board with respect to modern slavery matters. This report is the consolidation of the outputs from those efforts.

## Introduction

Access to fair, ethical and safe working conditions is a basic human right and one which promotes a sustainable life for all workers. As an employer, Gamuda seeks to develop its systems to ensure the human rights of our employees and stakeholders are respected in line with the United Nations Guiding Principles.

Gamuda is committed to ensuring that all business is conducted according to ethical, professional, and legislative standards in a fair, honest and open manner. We continuously look to implement and enforce effective systems and controls to ensure that we fully comply with the Modern Slavery Act 2018, in relation to all business activities.

Slavery and human trafficking can occur in many forms, including slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

The purpose of this Statement is to detail Gamuda's commitment and actions to identify, address, and prevent modern slavery within our operations and supply chains.

Gamuda upholds high standards of conduct and welcomes feedback from affected parties to improve our due diligence practices within our operations and supply chains. If you have concerns about modern slavery, potential human rights issues, or unethical behaviour in our operations or supply chain, we strongly encourage you to contact us. Your input is valued, and your right to anonymity protected.

**Any person may make a disclosure of improper conduct that concerns Gamuda to Noble Shore, Gamuda's dedicated external whistleblower service on [report@nobleshore.com.au](mailto:report@nobleshore.com.au).**

# A MESSAGE FROM THE CEO

At Gamuda, we believe that the legacy of our projects is measured not only by the concrete and steel we leave behind but by the integrity of the journey taken to build them. As we continue to deliver major infrastructure projects across Australia, we bear a profound responsibility to protect the rights and dignity of every individual in our operations and global supply chain.

In FY25, we managed a network of over 1,200 suppliers, including a \$41.7 million investment in 68 Aboriginal-owned businesses. Given that the construction industry accounts for 18% of global modern slavery victims, we have significantly matured our framework to address the risks associated with low-skilled labour and high-risk raw materials.

## **Our strategy is built on transparency and education.**

This year, we partnered with The Freedom Hub to deliver specialised training to over 680 employees. We also strengthened protections for our migrant workforce through rigorous VEVO verification and the appointment of a Global Migration Advisor, ensuring all workers enjoy the full protection of Australian workplace laws.

To maintain sector-leading standards, we have moved to a 100% digital pre-qualification system, enabling a deep dive assessments of high-risk commodities such as electronics, timber, and solar components. Our leadership within the ISC, Social Traders, and the GBCA further ensure that we are not just meeting industry benchmarks, but setting them.

While I am proud to report zero modern slavery incidents over the past three years, we have remained vigilant. In FY26, we will deepen our audits of renewable energy supply chains, enhance the accessibility of our whistleblower channels, and expand visibility beyond Tier 1 suppliers.

Eradicating modern slavery is a long-term journey, and Gamuda remains steadfast in building an equitable industry for the next generation.

## **Gamuda values**

### **Take Personal Ownership**

We are all accountable for our results and must strive for excellence

### **Walk the Talk**

We do what we say, live the values and lead by example

### **Adopt Open and Honest Communication**

We are open to others' views and opinions and aren't afraid to discuss, resolve and move on

### **Demonstrate Real Teamwork**

We actively work to break silos and work together across divisions

### **Develop Our People**

We strive to get the best out of our people and actively work with them on their development



A handwritten signature in black ink, appearing to read 'Ewan Yee'.

**Ewan Yee**

Chief Executive Officer

# ORGANISATIONAL STRUCTURE

Gamuda is part of Gamuda Berhad, a globally recognised engineering, property and infrastructure business founded in 1976. Gamuda Berhad operates in nine key countries which includes Malaysia, Australia, United Kingdom, Vietnam, Taiwan, Singapore, India, Qatar and Bahrain.

The image below shows the group’s organisational structure.

Gamuda was established in Australia in 2019 and focuses on the core business of infrastructure design, construction, operation, and maintenance. Areas in which we operate include roads, bridges, tunnelling, rail, dams and energy.

As of 2025, Gamuda Berhad had a total of 6,702 employees globally, and the group revenue was reported as worth a total of RM15.9 billion with total earnings of RM1 billion.

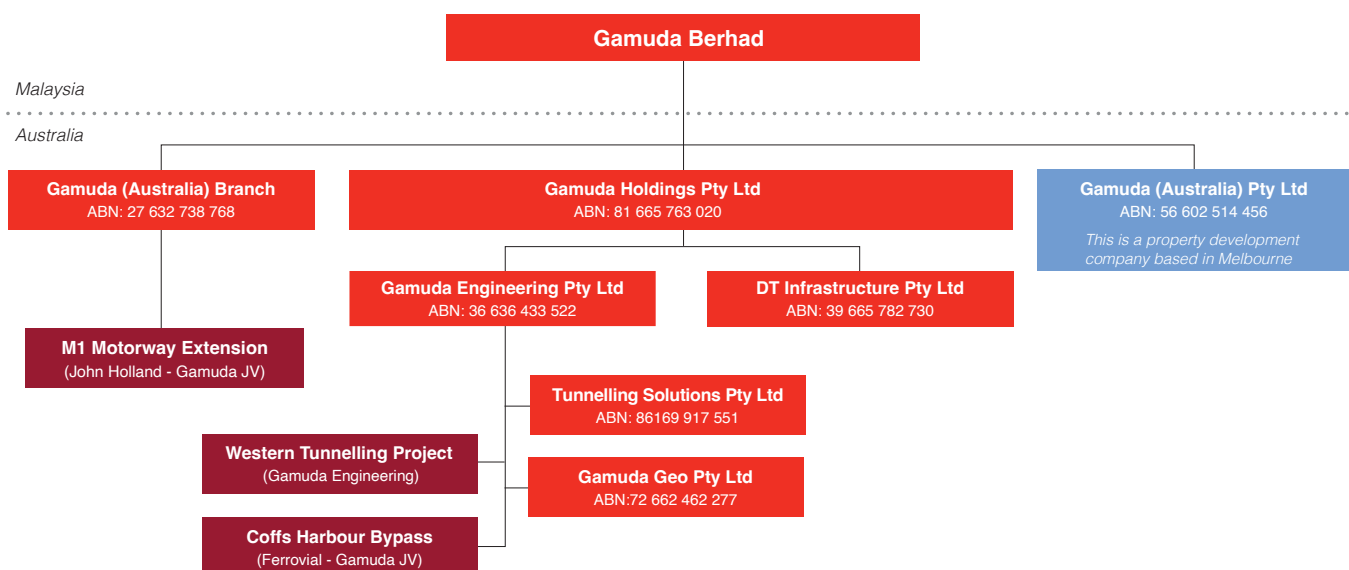
Our vision is to become a leader in the Australian infrastructure and construction sector by offering innovative, breakthrough and dependable solutions for large scale public infrastructure projects and private investment opportunities.

Our strength lies in our ability to identify, innovate, and deliver breakthrough engineering solutions to improve the standard of living for the communities in which we operate.

Gamuda also undertakes a range of joint venture activities and alliances which relate to construction projects in Australia.

## Our employees

At the close of the FY25 reporting period, Gamuda had a total headcount of **1,541 comprising of full-time employees, part-time employees and contractors** across our offices in Sydney and Melbourne including major projects in Western Sydney, Coffs Harbour and Newcastle. Independent contractors and consultants with specialist skill sets are employed on a temporary part-time or full-time basis depending on the requirements of the business. Contractors and consultants are employed for a defined period under an Independent Contractor Agreement.



Gamuda Berhad’s Australian Organisation Structure in FY2025

# OPERATIONS AND SUPPLY CHAIN

## Our projects

During the FY25 reporting period Gamuda was involved in the delivery of three major projects in New South Wales, Australia:

- Sydney Metro West - Western Tunnelling Package
- Coffs Harbour Bypass
- M1 Pacific Motorway Extension – Black Hill to Tomago Package

## Our supply chain

In FY25 Gamuda engaged with more than 1,200 suppliers, both domestic and international, including 68 Aboriginal businesses equating to a spend of \$41.7 million spent with Aboriginal businesses.

The overall key goods and services that were procured by Gamuda in FY25 included:

- Specialist consultants such as designers, environmental and sustainability experts
- Professional services such as legal and commercial property management
- Technology services and hardware suppliers
- Specialist subcontractors for undertaking works on our projects, such as civil, structural, building, electrical and mechanical
- Suppliers of specialist plant and equipment such as excavators, trucks, utes and cranes
- Suppliers of goods and materials relating to construction projects, such as steel and concrete
- Service providers such as labour hire, landscaping and cleaning
- Support services for construction projects, such as waste management



Location of Gamuda's corporate offices in Australia and current infrastructure projects.

# POTENTIAL RISKS IN OUR OPERATIONS AND SUPPLY CHAINS

Globally, an estimated 50 million people are currently living in modern slavery, an umbrella term that encompasses severe human rights violations including forced labour, human trafficking, and debt bondage. The vulnerability of workers globally has been further heightened by compounding crises—namely the COVID-19 pandemic, armed conflicts, and the impacts of climate change—which have collectively led to unprecedented disruptions in employment and increased distress migration

*(Source: Global Slavery Index).*

As Gamuda continues to grow within the Australian market, the potential risk to modern slavery within our operations and supply chain will increase. This means we must identify potential risks from the onset, ensuring we have the right framework implemented to mitigate all forms of modern slavery.

## Operational risks

Acknowledging that modern slavery comes in many different forms, our responsibility as an employer is to identify and mitigate any potential modern slavery risks within our own industry and business operations first, regardless of the level of severity.

Modern slavery practices that have been highlighted as having ‘high risk’ potential within the construction industry include:

- Forced or unpaid work
- Unsafe working conditions
- Bonded or child labour
- Inadequate accommodation
- Passport confiscation
- Human trafficking

A primary operational risk relates to the employment of migrant workers on temporary visas. Current global findings highlight that migrant workers are three times more likely to be in forced labour than non-migrant workers. This disproportionate vulnerability underscores the critical necessity of stringent oversight, fair recruitment practices, and robust protections for migrant labour across all our infrastructure projects. These individuals are integrated into our projects, both directly employed by Gamuda and indirectly through our supply chain.

Temporary visa holders are safeguarded by the interplay between workplace laws and immigration laws, which serves to ensure fair treatment and compliance, while

fostering a fair and just work environment. Gamuda is mandated to adhere to these laws, or it risks losing its accredited sponsorship status.

Despite their dependence on employers for legal status, temporary visa holders are guaranteed the same legal protection as any other employee. This ensures they receive fair pay and working conditions, safeguarding their rights and well-being.

## Potential risks in our supply chain

Gamuda is committed to working with our suppliers to encourage an open dialogue and partnership that leads to the identification and resolution of potential risks of modern slavery within our supply chain. Two risk areas have been identified and explored within our supply chain:

- the sectors in which products/services are procured; and
- the geographical location of the suppliers.

During FY25, we assessed some key risks associated within the different sectors and geographic locations in which we procure goods and services, whilst also assessing some sectors and geographic locations in which we will procure goods and services in the future.

## Sector risk

We continue to assess our current supply chain, as well as the sectors in which we will engage in the future. We conduct these assessments through our pre-qualification process, via our procurement software system ARIBA.

Beyond direct operations, our supply chain is exposed to modern slavery risks through the procurement of raw materials and manufactured goods. The products we buy connect us directly to global modern slavery risks; for example, electronics (such as laptops and mobile phones) currently represent the highest-value imported product at risk of forced labour globally.

Furthermore, as we expand our focus on renewable energy projects, we continuously monitor emerging risks in green supply chains. Solar panels and timber are heavily documented as high-risk commodities and are currently ranked among the top five products at risk of modern slavery imported into Australia. Recognizing these specific sector risks enables us to target our supplier due diligence and ethical procurement strategies more effectively.

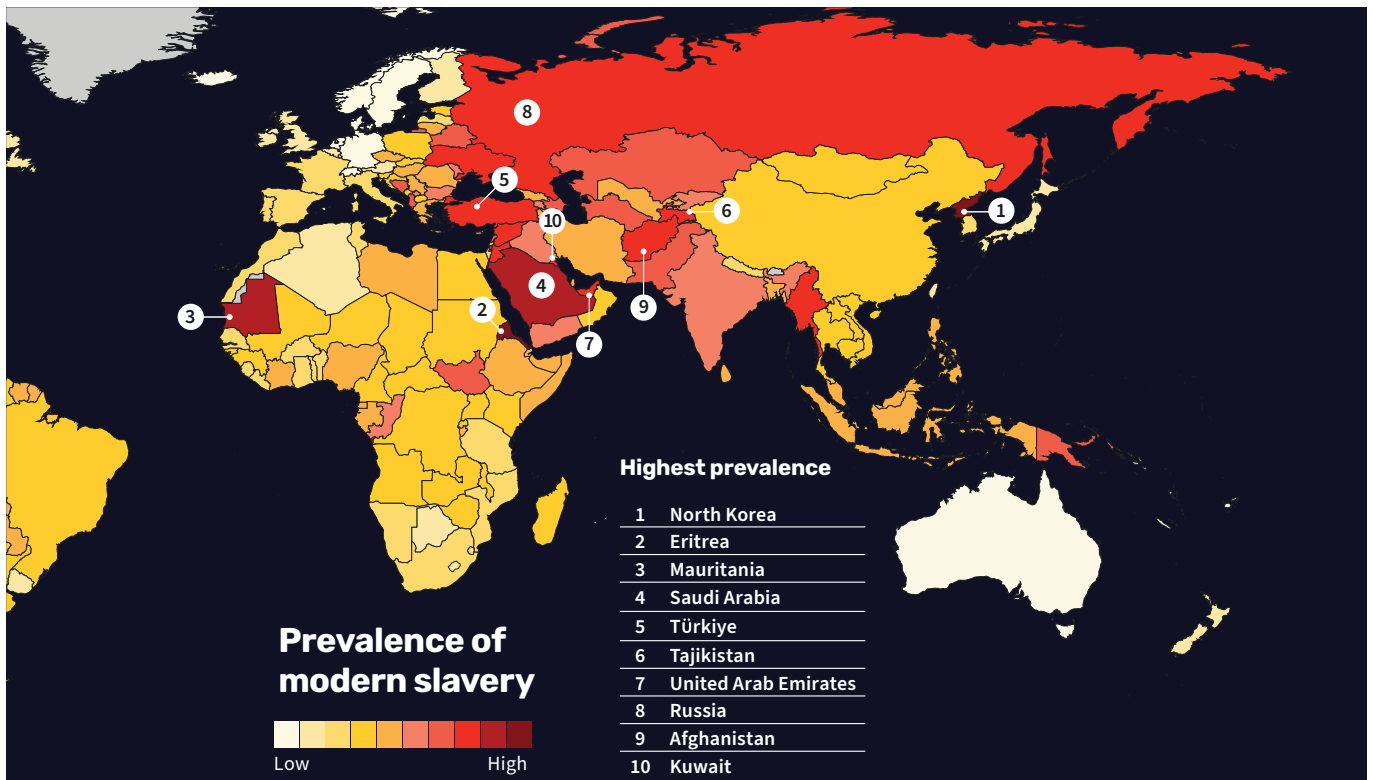
Sector	Example Service or Product	Potential Risks Identified
Bulk Materials	Quarrying, concrete, steel etc.	<ul style="list-style-type: none"> <li>Forced labour</li> <li>Human trafficking</li> <li>Child labour</li> </ul>
Service Provider	Labour hire, landscaping, cleaning etc	<ul style="list-style-type: none"> <li>Wages, penalties and working hours</li> <li>Forced/Compulsory labour</li> <li>Child labour</li> </ul>
Transportation	Transportation of plant/heavy machinery	<ul style="list-style-type: none"> <li>Human trafficking</li> <li>Forced/Compulsory labour</li> <li>Child labour</li> </ul>
Plant, Equipment and Machinery	Raw materials and manufacturing	<ul style="list-style-type: none"> <li>Forced/Compulsory labour</li> <li>Human trafficking</li> <li>Child labour</li> <li>Wages and working hours</li> </ul>
Technology	Electronic devices, laptops etc.	<ul style="list-style-type: none"> <li>Forced/Compulsory labour</li> <li>Child labour</li> <li>Wages and working hours</li> </ul>

### Geographical risk

Gamuda's direct supply chain was located across numerous countries during FY25, and we recognise that our suppliers have their own complex supply chains which may span over multiple countries.

Overall, the assessed level of risk of modern slavery within our direct supply chain was medium to high during FY25, due to the types of goods and services that were procured, combined with the geography of where they were procured from.

View the list of developing countries as declared by the Ministry of Foreign Affairs



Map of risk areas – Global Slavery Index 2023

# ADDRESSING THE RISK OF MODERN SLAVERY PRACTICES: POLICY, GOVERNANCE AND COLLABORATION

As Gamuda continues to establish itself in Australia and grow during FY25, the opportunity for potential risks of modern slavery to appear within our operations and supply chains will increase. As such, it is extremely important that we continue to establish and improve our processes continuously.

Our company values, as mentioned earlier in this Statement, provide a cultural framework to inform the behaviour of our people. The Head of Human Resources has primary and day-to-day responsibility for implementing our Modern Slavery Policy, monitoring its use and effectiveness, dealing with queries, and auditing internal control systems and procedures. The Country Director has overall responsibility for this policy.

Supply chain modern slavery risks are primarily monitored by the procurement team, however everyone at Gamuda has a responsibility to ensure that any business or person we conduct business with abides by our company code of conduct and relevant policies as outlined in the following sections.

## Policy and Governance

Gamuda is committed to an approach of active engagement and risk mitigation concerning any form of modern slavery. Our aim is to create a collaborative space where supply chain partners feel supported to discuss and address potential vulnerabilities within the supply chain. To assist in this we are committed to:

- Creating a safe working environment for all employees and contractors
- Adhering to all employment legislation, agreements, awards, codes, and regulations that protect the working rights for all employees and workers
- Providing training for our employees and workers about recognising modern slavery and human trafficking practices and explaining the steps they should take if they have a legitimate concern

To ensure we have the right frameworks in place to combat modern slavery, we developed and implemented formal policies and procedures to promote legal and ethically compliant business conduct and prevent violations of human rights.

Following the rollout of our dedicated Supplier Code of Conduct, Gamuda has partnered with The Freedom Hub, a social enterprise with a mission to end slavery in Australia, help survivors recover and thrive, and partner in the global fight to end slavery. In FY25 we commenced a collaboration with The Freedom Hub to deliver group-wide training on identifying and addressing modern slavery risks. This training was attended by 248 employees and has been viewed by 432 other employees since.

Since then, we have also begun to plan for delivering training for specifically Gamuda's procurement and plant management team. The objective of this training is to upskill and empower members of these departments to identify and address modern slavery risks directly, due to their strong interactions with the supply chain that are exposed to modern slavery risks.

For our operational risks, our recruitment process continues to include employment checks that ensure staff member's valid residency status. One way we do this is to check all temporary worker's visa conditions through the Visa Entitlement Verification Online system (VEVO).

Our onboarding process ensures that all new starters read, understand, and acknowledge all company policies and complete all necessary inductions, including Workplace Health and Safety, which outline the minimum expectations of how they are to operate within the workplace.

## Procurement Process

We have a 100% digital procurement process where all subcontractors and major suppliers undergo a pre-qualification process prior to the award of any works. As part of this process, we undertake an assessment of what they have in place to manage modern slavery risks in their own supply chains. Where we identify a risk, we undertake an advanced assessment.

In the advanced assessment we aim to get clarity on how the supplier manages and monitors their policies and procedures in their operations and supply chains, including assessments, audits, contractual requirements, training, guidance, etc. Each supplier is expected to clearly outline whether they are a reporting entity under the Commonwealth Modern Slavery Act 2018. They are to disclose any convictions, where materials are sourced from internationally, clearly explain what the human rights and modern slavery risks are within their own supply chains, and what policies and procedures are in place to eliminate these risks. Inspections are also undertaken by Gamuda where required.

## Modern Slavery Policy

In FY23, Gamuda implemented a Modern Slavery Policy into our suite of key company policies. This policy has since provided guidance on the different ways in which modern slavery can be present within an organisation. It also provides guidance on what to do if an employee or contractor discovers a potential case of modern slavery and outlines what Gamuda is doing to combat modern slavery in the workplace and throughout our business operations.

## Remediation

We encourage the reporting of all genuine concerns of malpractice or misconduct in the workplace. We do this by providing an accessible and safe reporting mechanism, and protecting people who make disclosures of serious wrongdoing, including unlawful, unethical, fraudulent, or undesirable conduct related to Gamuda.

As such, a comprehensive Whistleblower Policy is in place to ensure that there is a clear process for reporting malpractice or misconduct within the workplace.

This policy and procedure give our employees and contractors guidance on how and where to report concerns. Once a concern is reported through the appropriate channel, we acknowledge and investigate the

concern appropriately. Should the investigation sustain the concern raised, remedial action will be taken, the reporter will be advised, and all relevant information and outcomes will be documented.

To protect all whistleblowers, our policy prohibits any form of retaliation or negative impact towards anyone who reports a concern or participates in an investigation.

During FY25, there were no reports or concerns raised relating to modern slavery or human trafficking. While we had zero reports for the last 3 years, we remain vigilant and are actively reviewing our whistleblower channels to ensure they are culturally appropriate and accessible to our culturally and linguistically diverse (CALD) workforce.

## Partnerships

Since 2021 Gamuda has been an active member of the Infrastructure Sustainability Council (ISC), which aims to ensure all infrastructure activities deliver cultural, social, environmental, and economic benefits. By contributing to, and supporting ISC's vision, we aim to minimise the risks and impacts of modern slavery in all forms.

Gamuda has also been a member of Social Traders since 2022, an organisation which advocates for social enterprises by providing Australia's only social enterprise certification. Through driving the social impact agenda, Social Traders empowers people from refugee and asylum-seeking backgrounds to participate in employment opportunities and raises awareness of the barriers to employment for migrant workers in Australia and the associated modern slavery risks.

In FY24, Gamuda became a member of the Green Building Council of Australia (GBCA), which advocates and educates sustainable transformation of buildings, fit-outs and communities through Australia's largest national, voluntary, holistic rating system – Green Star. By aligning to the Green Star rating system, we will minimize the risk and impact of modern slavery in our supply chain.

In FY25 and beyond, we expanded our network by collaborating with other agencies like The Freedom Hub to continue to work toward eradicating modern slavery. This has resulted in a group-wide training on an introduction to identifying and addressing modern slavery risks.

In FY26 and beyond, we plan to deepen our partnership with existing networks by going beyond compliance and creating valuable processes to mitigate Modern Slavery risks.

# ASSESSMENT AND COMMITMENT

## Assessing effectiveness

Gamuda continuously assesses and looks to improve its operations and supply chains to remove risks of all forms of modern slavery in the workplace.

Key ways in which we assess the effectiveness of our modern slavery measures include:

- Regularly reviewing and assessing business processes against the governance frameworks that have been implemented to combat modern slavery in the workplace
- Identifying and collaborating with industry experts to assess and share knowledge of the key issues, trends and causes of modern slavery
- Monitoring the channels in which malpractice can be reported to spot any trends that could relate to modern slavery

## Future commitments

Our commitment to abolishing modern slavery is ever present and as such, we must take a continuous improvement approach to tackling it. Therefore, key actions have been identified and will be initiated during FY26, including:

- Delivery of bespoke department-specific training on modern slavery risk identification and actions for Gamuda employees.
- Continuous review and update of our suite of risk-related policies and governance control measures.
- Development of 3rd party audit process for high-risk supply chain products, particularly for renewable energy projects.
- Increasing and adopting due diligence activities across our operations and supply chain to ensure that we are minimising all potential modern slavery risk.
- Mature our understanding of modern slavery risks within our business beyond our tier one suppliers and explore opportunities to learn from industry and contribute to industry initiatives through various partnerships.

## Sign off

This Statement is made pursuant to section 13(1) of the Modern Slavery Act (Commonwealth) 2018. It constitutes the joint statement of Gamuda and covers the reporting period 1 July 2024 to 30 June 2025.

This Statement was prepared in consultation with our controlled entities (including the reporting entities). This Statement was approved by the board of Gamuda Holdings Pty Ltd ABN 81 665 763 020 on behalf of the reporting entities on:

16 March 2026

[Date]



Signed by Yew Weng (Ewan) Yee  
Director of Gamuda Holdings Pty Ltd