

Modern Slavery Statement

Financial Year 2025

Reporting Period: July 2024 to June 2025



Building sustainable communities and community assets through great relationships.



Introduction

Financial Year 2025 - Reporting Period: July 2024 to June 2025

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018 (Cth)* for the financial year ending 30 June 2025. It has been prepared by the Shadforth group of companies (collectively referred to as *Shadforth*), consisting of:

- **Shadforth's Civil Pty Ltd (ABN 68 162 606 377)**
- **Dirt Wise Pty Ltd (ABN 33 123 070 039)**
- **Shadforth Plant Hire Pty Ltd (ABN 21 116 979 714)**

This statement was approved by Ray Shadforth on behalf of the Shadforth group of companies as the principal governing body of *Shadforth's Civil Pty Ltd* and its subsidiaries on 31st October 2025.

Structure, Operations and Supply Chains

Shadforth's Civil Pty Ltd is a large privately owned Australian civil contracting company and has its head office in the Sunshine Coast, Queensland, with all contracted works being undertaken throughout Queensland and Northern New South Wales, Australia.

Shadforth was established in 1964 and has developed into one of Queensland's largest family-owned civil contracting company, the success of Shadforth has come from forming great relationships with our clients, subcontractors and suppliers. Shadforth is proud to utilise local resources wherever possible.

As part of the Shadforth group and under the same directorship as Shadforth's Civil Pty Ltd, there are two other subsidiary entities that exist in the business structure including Dirt Wise Pty Ltd and Shadforth's Plant Hire Pty Ltd.

Dirt Wise Pty Ltd is the legal employer for over 1100 employees. Dirt Wise Pty Ltd sole operations is internal labour hire to Shadforth's Civil Pty Ltd.

Shadforth's Plant Hire Pty Ltd is the legal owner of over 600 pieces of mobile plant and its sole operation is internal hire of mobile plant to Shadforth's Civil Pty Ltd, being the trading entity for civil construction projects.

Shadforth's main operations include its Civil Construction works including master residential communities, commercial and industrial subdivisions, stormwater drainage, sewer and water mains, major civil structures and culverts, bridges, tunnels, pump stations, bulk earthworks, environmental rehabilitation and road construction.

Shadforth's supply chains include the manufacture and transportation of the products it uses in its construction, such as concrete, gravel and pipes. In this context, Shadforth's supply chains include the manufacture of materials which are primarily locally sourced and the delivery and distribution of such materials. Shadforth's supply chain includes the suppliers of products and services used in its operations, including trucks, mobile plant, IT equipment, personal equipment and clothing, and temporary site facilities. Shadforth's supply chain also includes the services provided by contractors, including wet and dry hire of mobile plant, transport

and labour hire of workers.

In its statement, Shadforth's Civil Pty Ltd reports on its actions to assess and address modern slavery risks in its operations, including risks associated with the construction of civil works under contract. Shadforth also reports on how it incorporates modern slavery into its risk assessments and due diligence processes.

Shadforth Core Values have been built on respect, positive energy and hard work of our People, our commitment to a safety culture and our Excellence in delivering quality projects. form the basis of our Shadforth "Charter", which drives our people to achieve great construction outcomes for each and every project.

Shadforth supply chain plays an integral role in our success. The Shadforth Way sets out our company values that define how we do business - both internally and externally. One of our key values is Relationships - we build lasting relationships through trust and performance. We work closely with our supply chain to ensure they comply with all applicable legislative and regulatory requirements, as well as actively sharing our values. Shadforth supply chain consists solely of Australian entities. This supports the 'buy local' policies and commitments our clients often require, as well as providing Shadforth with greater oversight and ability to manage any risks associated with performance. Shadforth is actively improving due diligence processes to be compliant with all relevant legal obligations including modern slavery requirements.



Identifying and Assessing Modern Slavery Risks



Shadforth recognises that modern slavery risks may be present in parts of the supply chain, particularly in areas involving:

- The procurement of materials such as concrete, steel, and uniforms through third-party suppliers and manufacturers; and
- Labour hire arrangements in construction and supply logistics.

While these risks remain low within our directly controlled operations, Shadforth continues to monitor supplier relationships and maintain awareness of potential exposure in indirect tiers of the supply chain.

Actions Undertaken in Financial Year 2025

During the reporting period, Shadforth continued to focus on maintaining awareness and improving internal capability to identify and manage modern slavery risks. Actions included:

Awareness and Training

- Continued delivery of modern slavery awareness sessions across all levels of the business, including Executives, Procurement, Recruitment, and field management teams.
- Ongoing reinforcement of modern slavery awareness as part of site-based toolbox talks and internal compliance updates.
- Maintenance of training records to support transparency and audit readiness.

System Review and Preparation

- Continued review of options for third-party risk assessment software to strengthen supplier due diligence, with consideration given to cost, feasibility, and integration with Shadforth's systems.
- Ongoing evaluation of whether to:
 - Adopt external software,
 - Develop an internal tool, or
 - Await the implementation of the new ERP system (planned for 2026), which includes supplier risk assessment capabilities.

- As part of this future transition, internal systems are being prepared for updates in late 2025 to capture modern slavery-related supplier data for integration with the ERP platform.

Supplier Due Diligence

- Maintenance of supplier prequalification and assessment processes, including supplier declarations and codes of conduct where relevant.
- Ongoing review of uniform and merchandise suppliers to ensure alignment with ethical sourcing and sustainability standards.
- Continued reinforcement of subcontractor obligations through updated terms and conditions referencing modern slavery compliance

Policies and Governance

- Retained alignment of Shadforth's internal policies—including the Modern Slavery and Human Rights Policy, Procurement Procedures, and Recruitment Policy—with the requirements of the Modern Slavery Act 2018 (Cth).
- Modern slavery considerations continue to be incorporated within broader compliance, audit, and governance frameworks.



Future Focus - FY2026 and Beyond

In the next reporting period, Shadforth intends to:

- Maintain modern slavery awareness training across management, recruitment, and procurement functions.
- Continue assessing technology options for supplier risk mapping in line with the planned ERP implementation.
- Improve internal reporting capability by embedding modern slavery considerations into updated procurement and supplier data systems.
- Continue engaging with subcontractors and suppliers to promote understanding of Shadforth's expectations regarding ethical conduct and compliance.

Assessing Effectiveness

Effectiveness will continue to be measured through:

- The level of engagement and training participation across the organisation;
- The number of suppliers reviewed or assessed under updated prequalification criteria; and
- Periodic management review of progress towards the integration of risk assessment capability into the ERP framework.

Consultation and Approval

This statement has been prepared in consultation with the entities within the Shadforth Group and approved by Ray Shadforth, as the principal governing body of *Shadforth's Civil Pty Ltd* and its subsidiaries, on 28 November, 2025.

SIGNED: Ray Shadforth | Director - Shadforth's Civil Pty Ltd


Ray Shadforth

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