

FDC Group

Modern Slavery Statement 2024

This Statement is submitted by FDC Group Holdings Pty Ltd (ABN 68 615 183 358) on behalf of all eligible and voluntary FDC reporting entities, as defined in the Commonwealth Modern Slavery Act 2018 (MSA).

We do this as a complying entity, a demonstration of best practice, and consistent with the values we hold as a responsible, privately owned organisation.

About FDC

Established in 1990, FDC remains a privately owned, responsible organisation, employing in excess of 600 people. We have a strong balance sheet, strong staff retention and longevity, and revenues that consistently exceed \$1bn and continue to grow year on year.

FDC is governed by its Board of Directors, consisting of the Non-Executive Chairman and Founder of the business, and a number of current senior executives.

FDC are a multi-disciplinary builder, undertaking the design, construction, refurbishment, and fitout of a broad variety of projects on behalf of our many and varied clients. We also operate a Mechanical Services division which complements our own operations, and provides services to a variety of FDC's, and its own clients.

Headquartered in Sydney, we have National capability and maintain a significant corporate and operational presence in NSW, Victoria, Queensland, South Australia, Western Australia, and the ACT.

FDC operate across all Commercial, Industrial and Non-Residential asset classes. Our long-standing client and subcontractor relationships and the personal approach to our work, result in what we believe to be an unparalleled client experience and first-class reputation in our industry.

Our staff are empowered and motivated by our inclusive and respectful culture, our charitable giving and initiatives, and our commitment to improving the lives of the people and communities within which we operate.

Our "Great Place to Work" Certification, and our significant record of Industry Awards are testament to nearly 35 years of consistent hard work by all of our people and management, and the trust placed in us by our clients and business partners.

We live by our Made Personal™ branding and our corporate mantra of "It's not just what we deliver, but how we deliver that matters to us".



Our Structure, Operations and Supply Chain

Structure

FDC Group Holdings Pty Ltd is the parent company of all operating companies and divisions within the FDC Group, each of which are 100% owned. Each FDC operating division operates under its own ABN and is governed by the same management systems that oversee the FDC Group operations.

Operations

Each FDC operating division is headed by its own General Manager and Senior Leadership Team, who exercise various levels of autonomy within the disciplines of the FDC Integrated Management System (IMS), including the HSEQ and ESG Strategic Frameworks.

This level of managerial flexibility enables our teams to respond quickly to changing market conditions and client requirements, yet remain accountable to the governance processes and requirements of clients, regulators and the FDC group.

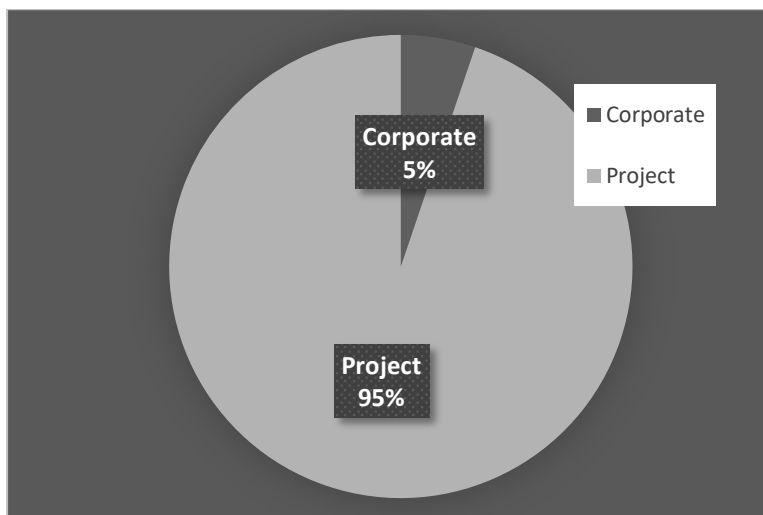
The FDC IMS is certified to International and Australian Safety (ISO 45001:2018), Quality (ISO 9001:2015) and Environmental Standards (ISO 14001:2015) and accredited by the Office of the Federal Safety Commission (OFSC). Our ESG and Corporate Social Responsibility systems undertake an annual reassessment and remain certified by EcoVadis, consistently rating amongst the top 20% of companies assessed.

Eligible and Voluntary Reporting Entities

Due to favourable trading conditions in our South Australian division, FDC (SA) qualifies as an Eligible Reporting Entity under the MSA for the first time in FY 23/24. Our other Eligible, and Voluntary Reporting Entities (listed below) remain unchanged from the previous year.

FDC Eligible Reporting Entities	FDC Voluntary Reporting Entities
FDC Group Holdings Pty Ltd FDC Construction (NSW) Pty Ltd FDC Fitout & Refurbishment (NSW) Pty Ltd FDC Construction & Fitout (VIC) Pty Ltd FDC Construction & Fitout (QLD) Pty Ltd FDC Construction & Fitout (SA) Pty Ltd	FDC Construction & Fitout (ACT) Pty Ltd FDC Construction & Fitout (WA) Pty Ltd FDC Mechanical Services Pty Ltd FDC Business Services Pty Ltd

FDC Total Procurement FY 24



Of FDC's FY 24 total procurement spend of \$1.33bn, approximately 5% was spent by the group as corporate expenses and 95% was project delivery based.

For the purposes of this report, FDC has assessed the modern slavery risks associated with both our own corporate expenditure and that of our projects, using the same risk-based approach.

Procurement – Summary and Process

During FY 24, FDC engaged the services of approximately 4,200 suppliers and service providers accounting for just in excess of \$1.33bn in total spend. Our vendor management system retains in excess of 13,000 vendors, of which 6,500 have been used at least once in the past 3 years.

Given the diverse nature of our business, we have a range of longer term, high value spend construction contracts and lower value, high turnover Fitout contracts. As a result, our supply chain is top heavy, long tail and defined by its long-standing vendor relationships.

In FY 24 our top 100 suppliers accounted for 51% of our total spend, compared to 42% and 48% in the previous 2 years, respectively. This year the top 200 suppliers accounted for 64% of our total spend.

This concentration and consistency of suppliers assists us in improving the visibility and confidence we have over the top end of our supply chain and gives us the ability to undertake further assessments as required. It does however, identify a level of risk in the long tail of our supply chain, of which we have been ware of for some time.

To mitigate this risk, FDC have been working with our suppliers over several years, to ensure that they are aware of any human rights and modern slavery risk elements that need to be considered in the trade packages and services that they provide to FDC.

All new vendors to our business continue to be provided with the FDC Modern Slavery Charter for Suppliers and Service Providers upon engagement, and are required to agree to and accept the provisions contained within it and respond to any questions or requests that we may have.

FDC's divisions and project teams retain significant autonomy over their procurement decisions. These decisions are made in accordance with the guidelines and framework of FDC's Integrated Management Systems, FDC Procurement Procedures and the ESG Strategic Framework.

During FY '24, FDC's procurement was almost 100% domestically sourced, with any direct offshore purchases having been directed by our clients, to meet specific requirements.

Of our \$1.33bn domestic procurement, the primary categories included:

- Structural Steel, Fabricated Steel, Hydraulics, HVAC Machinery and Equipment, Electrical, Concrete, Timber, Furniture/Workstations, Partitions, Roosting, Fire Services, Joinery, Civil and Demolition.

Of the direct International procurement of approx. \$1.5m, FDC's total direct offshore purchases were valued at just \$1.5m (0.12% of total) and were sourced from the USA (87%), Netherlands (7%) and Malaysia (6%).

These offshore purchases comprised a combination of light machinery, IT equipment and specialised furniture. Each of these categories have been third party assessed as being of Low or Moderate/Low risk of modern slavery, or one offs, with further due diligence deemed as being not required and of limited value.

As evidenced elsewhere in this statement, we remain vigilant of future direct offshore purchases and subject them to a higher level of due diligence.

More detail on the risk assessment findings of our FY 24 procurement are detailed below.

Actions and Improvements

Risk Assessments

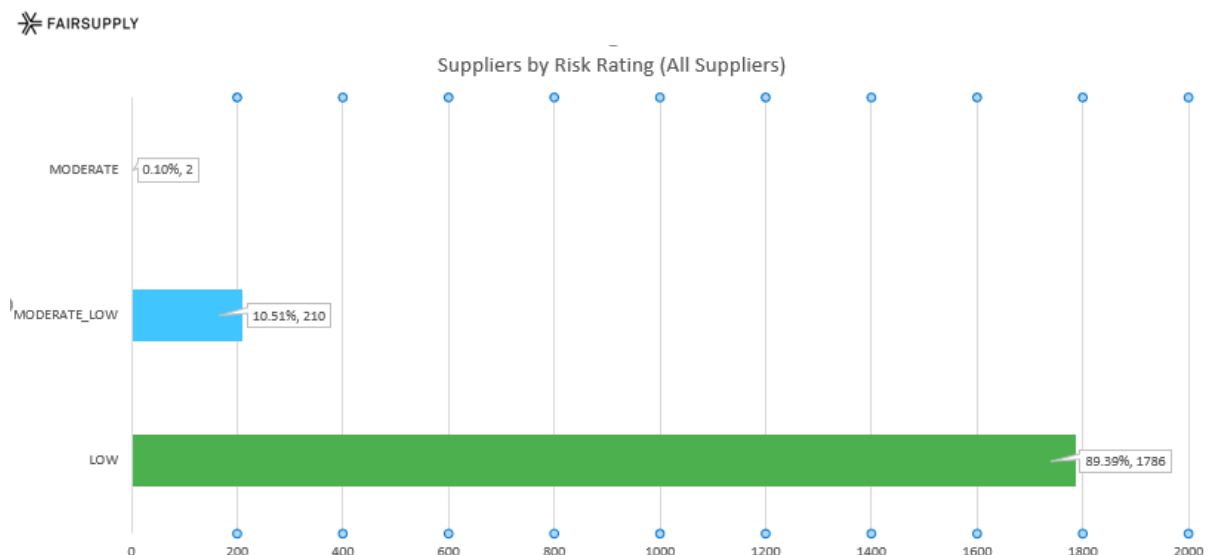
As referenced in our previous modern slavery statement, in FY 24 FDC engaged the services of a third-party expert, Fair Supply Analytics to assist us in further identifying and analysing any changes that may have occurred to our modern slavery risk profile in the past couple of years.

This assessment adopted a spend based approach, based on a combination of industry classifications and geographical locations, overlaid against a data set that takes into account the United Nations System of National Accounts, the Walk Free Foundation's Global Slavery Index and the International Labour Organisation's Global Estimates of Modern Slavery, amongst others.

Our supply chain risk assessment included our top 2,000 suppliers, with additional industry classification and manual due diligence done on our top 200 suppliers (accounting for 64% of our total spend).

This top down, analysis of the FDC supply chain, determined that of our top 2,000 suppliers:

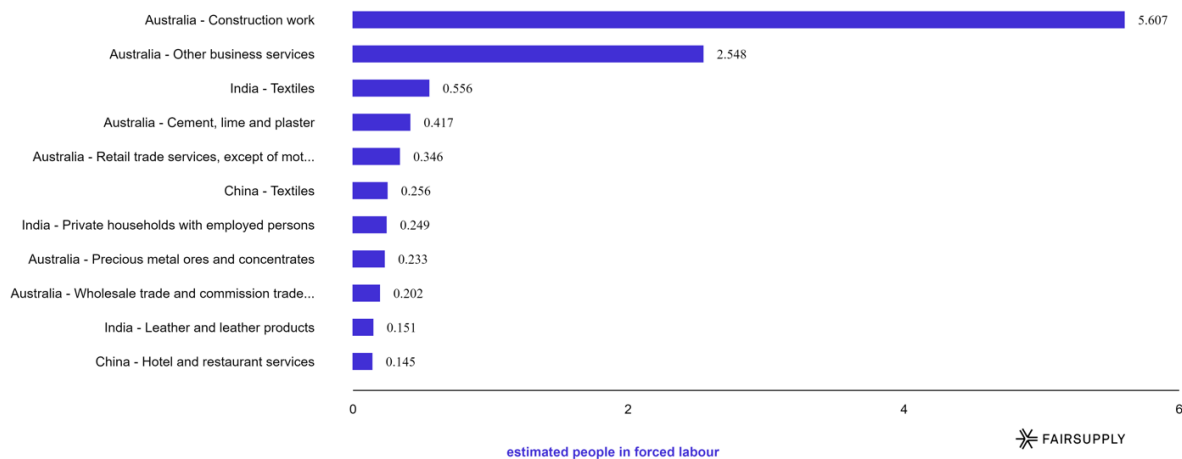
- 2 were assessed as being of Moderate Risk,
- 210 were assessed as being of Moderate/Low Risk
- 1786 were assessed as being of Low Risk of modern slavery.



There were no suppliers identified as being of High or Moderate/High risk, the highest levels on the Fair Supply risk matrix.

Based on a total FY 24 spend of \$1.33bn and the nature and classification of that spend, our supply chain risk assessment estimates, that throughout All Tiers of our supply chain:

- For every \$1m of FDC spend, there are 0.0157 people in forced labour per \$1m spent and
- A total of 21 people in forced labour in total, across our supply chain (see table below).



The findings of this base line risk assessment will form a basis from which FDC will undertake further analysis, identify areas of improvement, and undertake more targeted supplier due diligence and risk mitigation in subsequent years. We shall also undertake peer group comparative analysis and continued industry collaboration, to identify areas of further improvement.

Supplier Assessments

In FY 24 FDC implemented an additional measure by which to assess our suppliers, based on a number of ESG, HSEQ, Contractual and Governance issues and criteria, including Modern Slavery and Forced Labour. The FDC Subcontractor/Tenderer Assessment is a tool used by FDC estimating, pre-construction and project and procurement teams to determine the credentials and suitability of our suppliers on these issues, prior to engagement or procurement.

This tool is in the early stages of implementation and depending on the quality and quantum of responses and levels of constructive feedback received, will be re-assessed, and enhanced as required. This tool will also be used to complement the other means of supplier assessments at our disposal, such as the PCA/Informed 365 Modern Slavery Property Platform and the Fair Supply supplier assessment tool, Spotlight.

Each of these tools may be targeted in different ways to assist us in the mitigation of supplier risk, ongoing monitoring of actions, and determining areas of potential improvement with individual suppliers or industry categories.

Due Diligence

Consistent with our commitment to continuous improvement, FDC have recently undertaken additional due diligence on a number of pending, and potentially high risk of modern slavery categories of procurement.

These purchases involved the procurement of significant volumes of a number of bespoke products, including laminated timbers and GRC cladding. As payment and receipt of these goods occurred post our FY 24 close, further financial detail will be included in our FY 25 statement.

The due diligence on these purchases was conducted well in advance of commitment, and we are pleased to advise that the findings of our physical and desk top audits displayed high levels of traceability and awareness of modern slavery issues being displayed by each of these suppliers.

Our due diligence and supplier assessments allowed us to deem these purchases as being of low risk of modern slavery or human rights violations, and allowed us to confidently advise our clients to proceed with this procurement. Additional details of these purchases may be included in our FY 25 Modern Slavery Statement, as a case study.

Collaboration

FDC continues to engage and collaborate with a range of industry peers, clients, experts and third-party providers and platforms, to assist us in gaining a greater understanding of issues relevant to us and determining pathways for future actions and improvements. We thank all parties for their generosity and assistance.

These collaborations include, but are not limited to:

- PCA/Informed365 Property Platform and Modern Slavery Working Group
- Fair Supply Analytics
- Sustainability Professionals Association (SPA)
- SEDEX
- Australian Catholic Anti-Slavery Network (ACAN)
- EcoVadis
- Norton Rose Fulbright
- Construction Industry ESG Working Group

During the year, FDC hosted our inaugural Subcontractor Forum, where our NSW Fitout and Refurbishment leads, presented to our major delivery partners on the values and expectations of our business.

This was a collaborative and non-confrontational awareness session, where our sub-contractors and delivery partners gained exposure to the senior personnel of FDC and were given the opportunity of gaining a greater understanding of our business, from a Safety, Quality, Governance, and partnership perspective. This forum included presentations on our ESG initiatives and expectations, including Modern Slavery and Forced Labour, Sustainability, Diversity and Social and Responsible Procurement.

Given the success of this Forum, we plan on continuing to roll these sessions out across our business, as an invaluable means of communication and industry collaboration.

Consultation

Modern Slavery forms one of the five key pillars of the FDC ESG Strategic Framework. This framework is managed by the FDC ESG Manager who reports directly to the Chief Operating Officer and Directors of FDC.

The ESG Manager consults formally with FDC senior management on a monthly basis and more broadly with the FDC National senior leadership team on a six-monthly basis, and more regularly as needs be. These forums act as the most effective means of communicating and identifying areas of action and future priorities to achieve FDC's stated ESG goals and objectives.

In order to ensure lines of communication and consultation are maintained with the broader FDC delivery teams, the ESG Manager also attends and presents ESG updates at our monthly divisional meetings.

New members of the FDC team are inducted to the business via our onboarding process, which includes all elements of the ESG Strategic Framework, including our modern slavery expectations and initiatives.

During FY 24 FDC conducted a thorough review of its existing Subcontracts, Consultancy and Labour Hire Agreements to ensure they remain current and fit for purpose. Upon review and in consultation with our legal team, FDC have ensured that all relevant and mandatory clauses relating to modern slavery, and fair and forced labour, have been included in these contracts and agreements. As with all FDC processes, these documents will be subject to periodic review and improvement.

Effectiveness

FDC have had no reported instances, nor reported concerns of modern slavery within our own organisation or supply chains. We do not take this for granted, and remain vigilant as to the risks associated with the industry and environment in which we operate.

Continued consultation with our project and site-based teams over the past several years of reporting and action, has seen a noticeable increase in awareness and acknowledgement of the risks associated with modern slavery and forced labour amongst our own staff and subcontractor base. We acknowledge these are ongoing issues and subject to continual diligence on our behalf.

FDC continue to undertake a third-party assessment of our corporate social responsibility (CSR) and ESG processes, actions and outcomes and remain certified by the international CSR ratings agency, EcoVadis.

Such assessments contain suggested areas of improvement, which FDC assess and take into consideration in our future strategic planning. FDC consistently rank in the top 10-20% of peer group companies assessed by EcoVadis, using their Labour and Human Rights criteria. We look forward to continuing this annual assessment and continuing to implement suggested areas of improvement in our processes.

Other Relevant Information

Grievance and Remedy

The FDC Whistle-blower Policy and its associated procedures remains the principal means of governing, recording, and remediating any instances of modern slavery that may become apparent in our operations, or supply chains.

FDC also rely on various forms of site signage to act as both awareness documents and grievance mechanisms, amongst our site and office-based staff, suppliers, and contractors.

We have implemented a variety of awareness, reporting and grievance mechanisms across our sites nationally. In some instances, these may be our own resources, in others we may utilise client produced material if available and required.

Governance and Authority

The key policies and documents that guide and govern our modern slavery, ESG and other social initiatives are listed below.

FDC continually review these policies, codes, and documents to ensure that they continue to meet ours and our client's expectations, and all regulatory requirements.

Modern Slavery Policy	Environmental Sustainability Policy
Human Rights Policy	Work Health and Safety Policy
Code of Conduct and Ethics	Whistle-blower Policy
Modern Slavery Charter for Suppliers and Service Providers	FDC ESG Strategic Framework 2023-2025
FDC Subcontractor/Tenderer Assessment	FDC Subcontracts and Consultancy Agreements

This Statement was approved on 19th December 2024 by the undersigned, and has the full support of the FDC Board of Directors and FDC Senior Leadership Team.



Russell Grady
Managing Director



Peter McCabe
Finance Director