



MODERN SLAVERY STATEMENT

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ACKNOWLEDGMENT OF COUNTRY

PCF Construction Services Pty Ltd (**PCF Formwork**) acknowledge the Traditional Custodians of the Lands on which we operate and build throughout Australia, and we recognise their continuing connection to the land, waters and culture.

We pay our respect to them and to Elders, both past and present and to emerging community leaders.

We recognise and acknowledge the impact of what today, we call 'modern slavery' on the First Nations people, including forced labour, removals, segregation, servitude, child labour, and forced labour.

We are committed to review slavery, eugenics, antisemitism, and other forms of race-based thinking in our industry to educate, prevent, and improve the construction industry for a better life for all.

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INTRODUCTION

MODERN SLAVERY

Modern slavery risks exist within global construction supply chains, particularly in the procurement of materials and the use of subcontracted labour. As a formwork and structural contractor operating across Australia, PCF recognises that it may be exposed to these risks through its subcontracting arrangements and the sourcing of materials and products that form part of broader international supply chains.

These risks can arise at multiple stages of the supply chain, including manufacturing, processing and labour engagement across both domestic and offshore suppliers. PCF acknowledges that visibility beyond its direct suppliers can be limited in complex, multi-tiered construction supply chains.

PCF is committed to identifying, assessing and mitigating modern slavery risks within its operations, labour supply arrangements and supply chains in accordance with the Modern Slavery Act 2018 (Cth). PCF recognises that modern slavery risks are more likely to arise through workforce and recruitment practices, subcontracting arrangements and the procurement of materials and equipment used in its construction activities. PCF is committed to addressing these risks through appropriate due diligence, responsible procurement and ethical business practices.



ABOUT PCF

PCF Construction Services Pty Ltd (PCF) is a privately owned Australian company specialising in formwork and structural works across mid to large-scale projects.

At PCF, we recognise that modern slavery risks can arise within both workforce arrangements and construction supply chains. As a formwork and structural construction contractor operating across Australia, PCF's primary areas of potential exposure include labour hire arrangements, subcontracted labour, recruitment practices and the procurement of materials and products used in project delivery.

PCF delivers construction projects through a combination of directly employed personnel, labour hire personnel, subcontractors and suppliers. This operating model involves engagement across multiple tiers of workforce and supplier relationships and requires ongoing oversight to identify and manage potential modern slavery risks.

PCF's supply chain includes the procurement of construction materials, equipment and services sourced both domestically and internationally. These may include formwork systems, steel products, timber and other construction materials that are manufactured, processed or distributed through multi-tiered supply chains. While PCF's direct suppliers are predominantly Australian businesses, some products and components may originate from higher-risk jurisdictions as part of global manufacturing and distribution networks.

PCF recognises that modern slavery risks may arise through labour hire and subcontracting arrangements, including the recruitment and engagement of workers within the construction industry, as well as through the sourcing of materials and products from complex supply chains. PCF is committed to strengthening governance, supplier engagement, workforce due diligence and ethical procurement practices to identify, assess and mitigate these risks across its operations and business relationships.



ABOUT OUR VISION & VALUES

Our vision is to deliver safe, high-quality buildings, operate without harm, and contribute to a stronger construction industry and improved quality of life. We do this by working in a way that is supportive, authentic, driven and focused on delivering value for our clients and stakeholders, in alignment with our core values:



We are committed to delivering safe, high-quality construction outcomes while operating responsibly across our projects, workforce and supply chain. This includes maintaining a strong focus on safety, ethical conduct, lawful employment practices and continuous improvement in the way we manage risk and deliver our services.

PCF promotes a workplace culture that is accountable, collaborative and aligned with its core values of safety, integrity and performance. These values underpin our approach to engaging employees, labour hire personnel, subcontractors, suppliers and other business partners.

PCF is committed to providing fair and lawful working conditions, maintaining safe workplaces and supporting workforce wellbeing through appropriate training, supervision and development opportunities. We seek to foster a culture where concerns can be raised, addressed and managed appropriately, and where workers are treated with dignity and respect.

Through our governance frameworks, workforce management practices and supplier engagement processes, PCF aims to identify and manage modern slavery risks and promote ethical and responsible business practices across its operations and business relationships.

REVIEWING MODERN SLAVERY RISK

This is PCF's first reporting year, and the business is focused on developing a clear understanding of modern slavery risks across its operations and supply chain. As part of this process, PCF is strengthening its approach to risk identification, supplier due diligence and workforce oversight, while building awareness and capability across key internal stakeholders. As a formwork and structural construction contractor, PCF recognises that modern slavery risks may arise through labour hire arrangements, subcontracted labour, recruitment practices and the procurement of materials and services used in project delivery. In assessing these risks, PCF considers factors such as the nature of workforce arrangements, the use of subcontractors and labour hire providers, the complexity of supply chains, geographical sourcing risks and the level of visibility and oversight available across supplier and subcontractor relationships.

PCF's initial assessment indicates that its primary modern slavery risks relate to labour supply arrangements and subcontracting practices, including the engagement of labour hire personnel and subcontractors across project delivery. These arrangements may reduce visibility over employment practices beyond direct employment relationships and increase the risk of worker exploitation, underpayment, worker misclassification or other non-compliant labour practices.

Secondary risk exposure may arise through the procurement of materials, products and services sourced through complex domestic and international supply chains. Materials incorporated into construction projects may pass through multiple tiers of suppliers before reaching site, reducing visibility of labour practices beyond PCF's direct contractual relationships.

PCF considers its direct employment risks to be relatively low due to its established employment frameworks, compliance with Australian workplace laws and internal governance processes. Nevertheless, PCF is committed to continuously improving its oversight of workforce practices, supplier relationships and procurement activities.

PCF manages these risks through supplier and subcontractor selection processes, labour hire and subcontractor due diligence, contractual requirements, workforce oversight measures and ongoing efforts to improve transparency, accountability and ethical business practices across its operations and supply chain.

PCF

ADDRESSING MODERN SLAVERY RISK

GOVERNANCE & CULTURE

PCF is managed by our Managing Director, Steve Sarris, together with the leadership team, which provides oversight of governance, risk and compliance across the business.

Responsibility for modern slavery risk management is supported through senior functions including legal, procurement, people and culture, and operations, including oversight of labour hire engagement practices where applicable. This ensures modern slavery considerations are embedded within relevant business processes and decision-making.

PCF promotes a culture of accountability and ethical conduct supported by its Code of Conduct, Whistleblower Policy and related governance frameworks. These mechanisms provide avenues for reporting concerns and reinforce expected standards of behaviour across employees and subcontractors.

ADDRESSING MODERN SLAVERY RISK

EMPLOYEE POLICIES & PROCEDURES

PCF maintains a suite of policies and supporting procedures that set expectations for behaviour, guide working relationships, and reflect our values and culture. The table below outlines the key policies most relevant to managing human rights risks for our employees, workers, and broader supply chain stakeholders.

Policy & Procedure	Purpose
Code of Conduct	Sets out the standards of behaviour expected across PCF, including ethical and professional principles. All PCF team members are required to comply with the Code of Conduct, which also extends to contractors engaged by the business.
Respect and Wellbeing Policy	Sets out PCF's commitment to the health, safety and wellbeing of all people across its workplaces and projects. It promotes a safe, fair and inclusive working environment for employees, contractors, consultants, visitors and trade partners.
Psychosocial risk policy	Sets out PCF's commitment to protecting the psychological health and safety of all people across its workplaces and projects. It outlines PCF's approach to identifying, managing and controlling psychosocial risks in line with WHS legislation and recognised standards, supported by consultation, training and continuous improvement.
Whistleblower Policy	Sets out how individuals can make a protected disclosure regarding misconduct at PCF and how such disclosures are managed. It ensures appropriate protections are in place, including confidentiality, protection from detriment and safeguards for eligible disclosures.

All team members are introduced to our policies through the induction and onboarding and are required to acknowledge their acceptance to our policies at that stage.

ADDRESSING MODERN SLAVERY RISK

SUPPLIER ENGAGEMENT & MANAGEMENT

PCF engages with its suppliers and subcontractors to manage modern slavery risks across its supply chain. Supplier engagement is based on a risk-informed approach that prioritises higher-risk categories of materials, services and subcontracted work. This includes consideration of labour hire providers and subcontracted workforce arrangements where relevant to project delivery.

PCF applies a structured procurement and onboarding process that includes modern slavery risk considerations as part of supplier selection and approval. This is supported by supplier questionnaires and declarations designed to assess compliance and identify potential risk exposure.

Where higher risks are identified, PCF undertakes further engagement and follow-up with suppliers to improve visibility of labour practices across the supply chain. This may include additional information requests and targeted review of subcontractor arrangements.

PCF's contractual arrangements also include modern slavery obligations, requiring suppliers to comply with applicable laws and support PCF's risk management expectations.

TRAINING

PCF recognises the importance of raising awareness of modern slavery risks across its workforce. Modern slavery awareness is included in the induction process for all new employees and supported through ongoing training for relevant personnel.

Training provides an overview of modern slavery risks in both Australian and global construction supply chains and supports employees in identifying and escalating potential risks within PCF's operations and procurement activities. Training also supports awareness of reporting pathways and encourages employees to raise concerns where risks are identified.

PCF provides periodic refresher training to reinforce awareness and ensure continued understanding of modern slavery risks and obligations across the business.

COLLABORATION

PCF recognises the importance of collaboration in addressing modern slavery risks within the construction industry. PCF engages with industry peers, suppliers and relevant stakeholders to support improved awareness, share learnings and promote consistent approaches to managing risk.

PCF continues to explore opportunities to participate in relevant industry forums and initiatives to strengthen its understanding of modern slavery risks and support continuous improvement in supply chain practices.

ASSESSING

EFFECTIVENESS OF ACTIONS

PCF assesses the effectiveness of its modern slavery actions through ongoing review of policies, procedures and supply chain controls. As this is PCF's first reporting period, this assessment has focused on establishing a baseline understanding of current practices and identifying opportunities for improvement.

During the reporting period, PCF undertook a review of its existing systems and implemented a range of foundational controls to support its modern slavery response, including:

- enhancement of procurement processes to incorporate modern slavery considerations in supplier selection
- introduction of anonymous reporting channels, and whistleblower policies.

PCF will continue to assess the effectiveness of these actions through periodic internal review, monitoring of supplier compliance, and ongoing refinement of its risk assessment processes. This includes tracking progress against defined roadmap initiatives and strengthening controls where required as detailed on the following page.

ROADMAP

WHAT'S NEXT 2026/27

PCF is committed to the ongoing development of its modern slavery response and continues to identify key priorities, targets and planned actions to strengthen its approach. These initiatives include both short-term priorities and longer-term improvement activities aimed at enhancing risk identification, supplier engagement and internal capability. PCF will continue to monitor and report on progress against these actions in future Modern Slavery Statements as part of its commitment to continuous improvement.

Initiative	Purpose	Measurement/KPI	Implementation Timeframe
Modern Slavery Mapping	To identify and assess areas of elevated modern slavery risk across PCF's workforce arrangements, subcontracting model and supply chain.	Risk assessment completed identifying higher-risk supplier, subcontractor, labour hire and procurement categories.	30 June 2027
Supplier Modern Slavery Due Diligence	To improve identification and management of modern slavery risks through targeted due diligence of higher-risk suppliers, subcontractors and labour hire providers.	Modern slavery questionnaires and risk assessments completed for identified higher-risk suppliers and labour providers.	30 June 2027
Contractual Modern Slavery Requirements	To ensure modern slavery obligations are embedded within supplier and subcontractor agreements.	100% of new and renewed contracts include modern slavery clauses and compliance requirements.	30 June 2027
Modern Slavery Awareness and Training	To build awareness of modern slavery risks and reporting obligations across employees and key business partners.	Modern slavery awareness materials developed and incorporated into onboarding and training processes.	30 June 2027
Monitoring and Continuous Improvement	To strengthen ongoing monitoring of supplier compliance and improve modern slavery risk controls across operations and supply chain.	Annual review of modern slavery controls completed, with identified improvements tracked and implemented.	30 June 2027

ENDORSEMENT & CONSULTATION

OUR DIRECTOR



This Statement is made pursuant to section 13(1) of the Modern Slavery Act 2018 (Cth) (Modern Slavery Act). It constitutes the joint statement of the PCF Construction Services Pty Ltd and the reporting entities named in this Statement for the reporting period 1 January 2025 to 31 December 2025.

The Statement was prepared in consultation with our related entity.

This statement was approved by Steve Sarris, as the only Director governing body of PCF and related entity, for the period.

17 June 2026

A handwritten signature in black ink, appearing to be 'S. Sarris', written over a dark grey rectangular background.

STEVE SARRIS

Managing Director

GETTING IN TOUCH

For any questions or feedback in relation to this statement, contact PCF's Finance Manager



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