

MODERN SLAVERY STATEMENT



1. Introduction

Grindley is **COMMITTED** to taking all reasonable steps to ensure that the goods and services we procure are not the result of modern slavery. We acknowledge our legal and ethical responsibility to consider, identify, manage and report on modern slavery risks within our operations and supply chain in accordance with the Modern Slavery Act 2018 (Cth).

Modern slavery represents a severe violation of human rights. It includes:

- slavery, servitude and forced labour
- deceptive recruiting
- trafficking in persons and trafficking in children
- debt bondage
- sexual servitude
- forced child labour
- forced marriage and forced child marriage
- the use of children in the production of abusive material

Modern slavery not only poses risks to people, but also to communities. It distorts markets, reduces productivity and competition, and undercuts responsible business. This produces significant costs, inefficiency and waste for broader stakeholders.

Through this Modern Slavery Statement, Grindley outlines the risks relevant to our business, and the actions implemented to mitigate, address and prevent modern slavery throughout our operations and supply chain.

2. Reporting Entity

This Modern Slavery Statement has been prepared as a joint statement by Grindley Construction Pty Limited and Grindley Interiors Pty Ltd for the financial year **1 July 2024 – 30 June 2025**.

Reporting entities: Grindley Construction Pty Limited (ABN 42 003 586 687)
Grindley Interiors Pty Limited (ABN 73 148 960 730)
Head Office: Ground Floor, 55 Grandview Street, Pymble, NSW 2073
Website: Grindley.com.au
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3. Grindley's Structure, Operations and Supply Chain

Structure

Founded in 1988, Grindley is an Australian-owned construction group known for its capability across the aged care, retirement living, education, commercial and industrial sectors. The group includes two divisions specialising in construction (Grindley Construction) and high-end interior fit-out works and building upgrades (Grindley Interiors).

Operations

Grindley delivers projects across Sydney metropolitan, Greater Sydney, and regional NSW, meeting the needs of our repeat and new clients in various sectors. We employ over 100 people, including office-based and site-based personnel.

Supply Chain

As a head contractor, Grindley coordinates subcontractors and suppliers to deliver construction projects. Our vendors are primarily located within NSW, and many are small-to-medium enterprises that are not individually required to publish modern slavery statements. However, all are contractually required to comply with Grindley's ethical standards, policies and procedures.



Typical tiers include:

- Client
- Grindley
- Tier 1: direct subcontractors and suppliers (vendors)
- Tier 2: manufacturers and processors of goods
- Tier 3: raw material producers (timber, steel, cement, glass, textiles, etc.)

4. Identified Modern Slavery Risks

Grindley recognises risks inherent in construction supply chains. These risks are categorised based on the organisation's level of contribution or linkage.

Migrant Worker Vulnerability — Contributes

Workers with visa limitations, language barriers, or lack of knowledge of their rights may be vulnerable to exploitation.

Training and Awareness Gaps — Contributes

Some employees or subcontractors may not yet have completed modern slavery training or may not fully understand reporting pathways.

Complex Supply Chains — Contributes / Linked

Construction procurement often involves products sourced from regions with varying labour standards and low transparency.

Multi-layered Subcontracting — Linked

Some subcontractors further outsource labour to smaller entities, limiting visibility of labour practices and increasing risk.

5. Actions Undertaken in FY 2024–2025

Grindley continued to strengthen its modern slavery controls through:

Subcontractor Prequalification

- Mandatory modern slavery questionnaires for new subcontractors
- Review of supplier disclosures and supporting evidence

Controlled Tendering

- Invitations primarily issued to trusted contractors with established compliance track records

Policy Review

- Annual review and update of the Human Rights Policy
- Alignment with Australian Human Rights Commission expectations

Governance Integration

- Modern slavery included as an agenda item in management meetings
- Monitoring of progress against internal risk and compliance objectives

These actions increase visibility across our supply chain and support safer, more ethical practices.

6. Assessing the Effectiveness of Our Actions

Grindley strengthened the way we assess whether our activities to identify and address modern slavery risks are effective. Our approach is based on measurable indicators, governance oversight and continuous improvement.

Effectiveness Indicators

Indicator	Measurement Method	FY 2024–25 Target
Supplier due diligence completion	% of subcontractors completing questionnaires	100% completion for high-risk suppliers
Training effectiveness	Induction completion & knowledge checks	Improved worker understanding of rights & reporting
Supply chain visibility	Count of high-risk suppliers identified and addressed	Corrective actions issued where necessary
Grievance and remediation response	Number of concerns reported & resolution times	Launch of formal remediation pathway
Policy maturity	Findings from annual review cycle	Integration of modern slavery into procurement & contract renewal

The WHSEQ Department monitors these indicators quarterly and reports outcomes to the Executive Team. This ensures Grindley adopts an adaptive and continually improving approach to ethical supply chain management.

7. Consultation

Consultation for this statement included engagement with:

- Directors
- Senior management
- Procurement teams
- HR and WHS teams
- Site management teams

Input from all relevant stakeholders ensured that the assessment of risks and the actions implemented are accurate, effective and operationally sound.

8. Future Commitments (FY 2025–2026)

Grindley is committed to expanding its modern slavery controls and transparency. Our improvements for the coming financial year include:

- Implementation of a formal grievance and remediation framework accessible to workers within our supply chain
- Increased training and awareness for procurement, site managers, contract administrators and project managers
- Risk-based ongoing subcontractor reviews, rather than one-off onboarding checks
- Quarterly internal reporting of modern slavery performance metrics
- Collaboration and benchmarking against industry peers and construction sector guidance
- Strengthened supply chain mapping
- Conducting tailored due diligence to identify the residual risks associated with specific suppliers. This could involve tools like supplier self-assessment questionnaires and evaluation procedures

Grindley recognises that ethical supply chain governance is ongoing and requires collaboration with industry, proactive risk assessment, worker voice mechanisms and consistent improvement.

This Modern Slavery Statement was approved by the Board of Grindley Construction Pty Limited and Grindley Interiors Pty Limited on 25th November 2025.



Matthew Macauley
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Grindley Construction Pty Limited



Asha Meller
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Grindley Interiors Pty Limited