



MAINBRACE
CONSTRUCTIONS



FY25

MODERN SLAVERY STATEMENT

ACKNOWLEDGEMENT OF COUNTRY

We acknowledge the Traditional Custodians of the land where we work and live. We pay our respects to Elders past, present and emerging.

We celebrate the stories, culture and traditions of Aboriginal and Torres Strait Islander Elders of all communities who also work and live on this land.

INTRODUCTION

A fundamental strategy of our business is the creation of shared value and in doing so we acknowledge the potential for any of the eight types of serious exploitation defined in the Act to occur in our operations and extended supply chains. We understand and accept our continuing obligation to assess and address these risks.

The statement is issued in compliance with the Modern Slavery Act 2018 (Cth) (the Act) requirement to report on the risks of modern slavery in our operations and supply chains for the reporting period of **1 July 2024 – 30 June 2025**.



REPORTING ENTITY

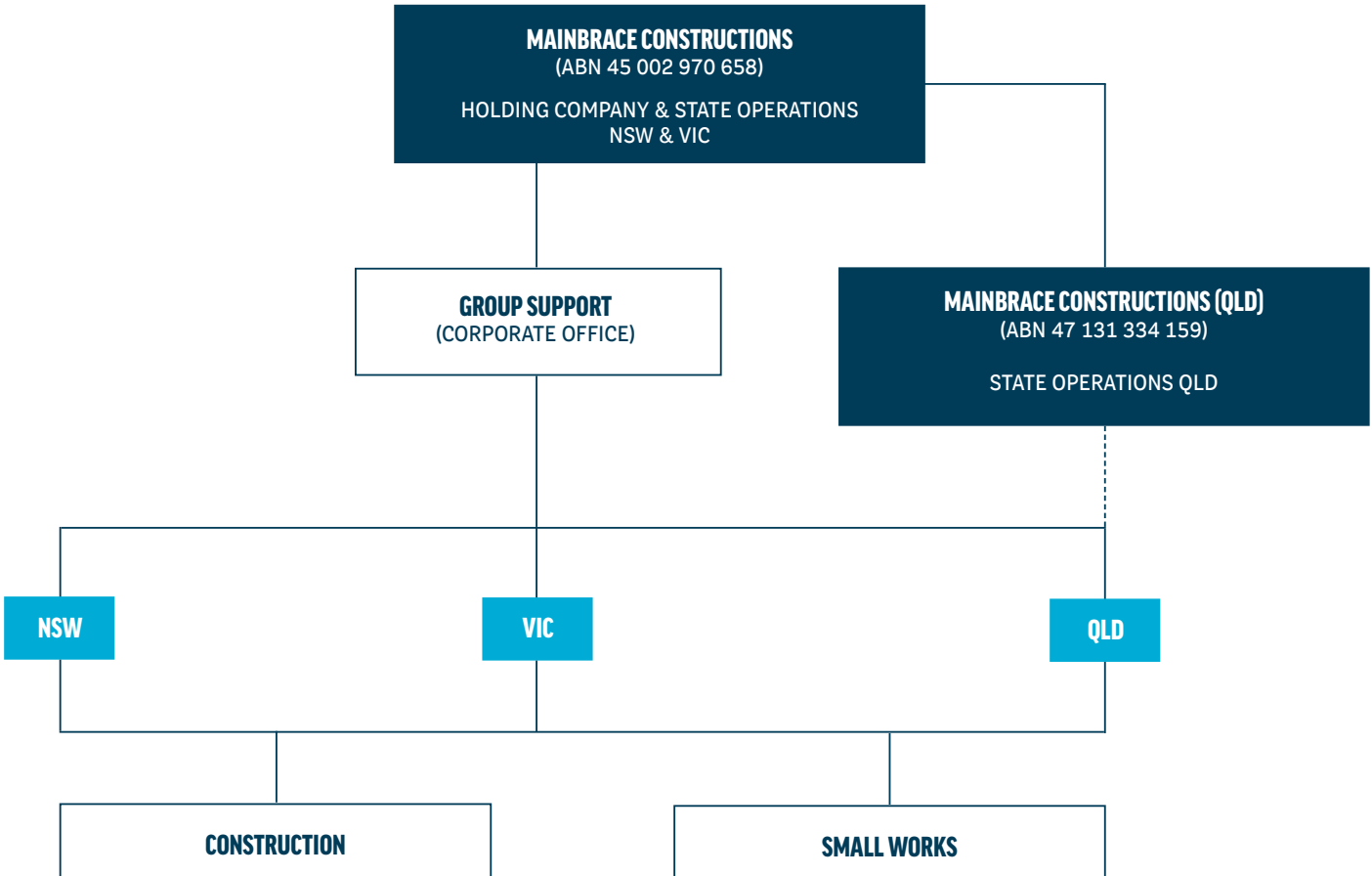
The reporting entity is Mainbrace Constructions Pty Limited (ABN 45 002 970 658) and its wholly owned subsidiary Mainbrace Constructions (QLD) Pty Limited (ABN 47 131 334 159).

Mainbrace Constructions Pty Limited and Mainbrace Constructions (QLD) Pty Limited both operate in the retail sector of the construction industry. Both companies have shared ownership and directorship, a shared corporate office (Group Support), shared systems, policies and processes and many shared suppliers. Accordingly, all reports of actions to assess and address modern slavery have been consolidated for both entities in this statement.

STRUCTURE, OPERATIONS & SUPPLY CHAIN

Mainbrace is a retail construction specialist having successfully completed more than 1,900 projects over the past 36 years with a consolidated revenue of \$526M in FY25.

Mainbrace's Organisational Structure is as outlined below:



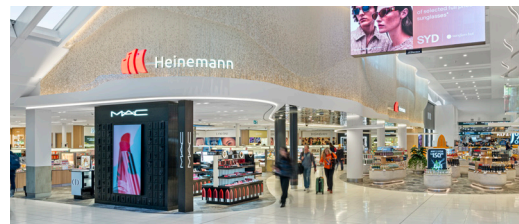
OUR DIVISIONS

There are two main construction divisions within the business:



CONSTRUCTION

Retail construction is the core of our business. The division encompasses a wide range of projects from large format retail to supermarket rollouts, to refurbishment of existing retail centres, to retail logistics and new greenfield retail centres.



SMALL WORKS

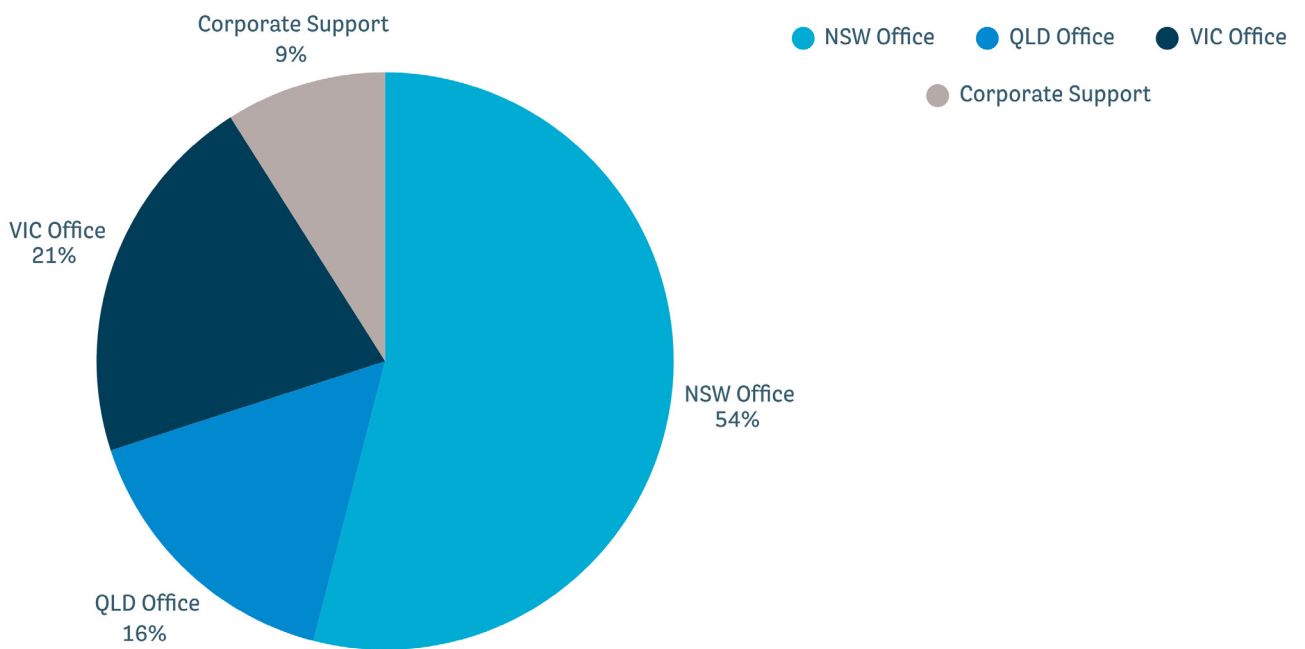
Leveraging our proven experience in Supermarket Refurbishments and Interiors, our Small Works division is dedicated to delivering professional, efficient, on-time smaller projects. We combine competitive pricing with agility and efficiency, offering exceptional service tailored to our client needs—whether it's a complex refurbishment, a new build, or a capital works project.

OUR PEOPLE

Mainbrace directly employs approximately 295 people, over 99% of which reside in Australia and 91% of which are permanent salaried employees with the remainder employed under Industry awards and agreements.

The distribution of the workforce across the business is as follows:

MAINBRACE WORKFORCE

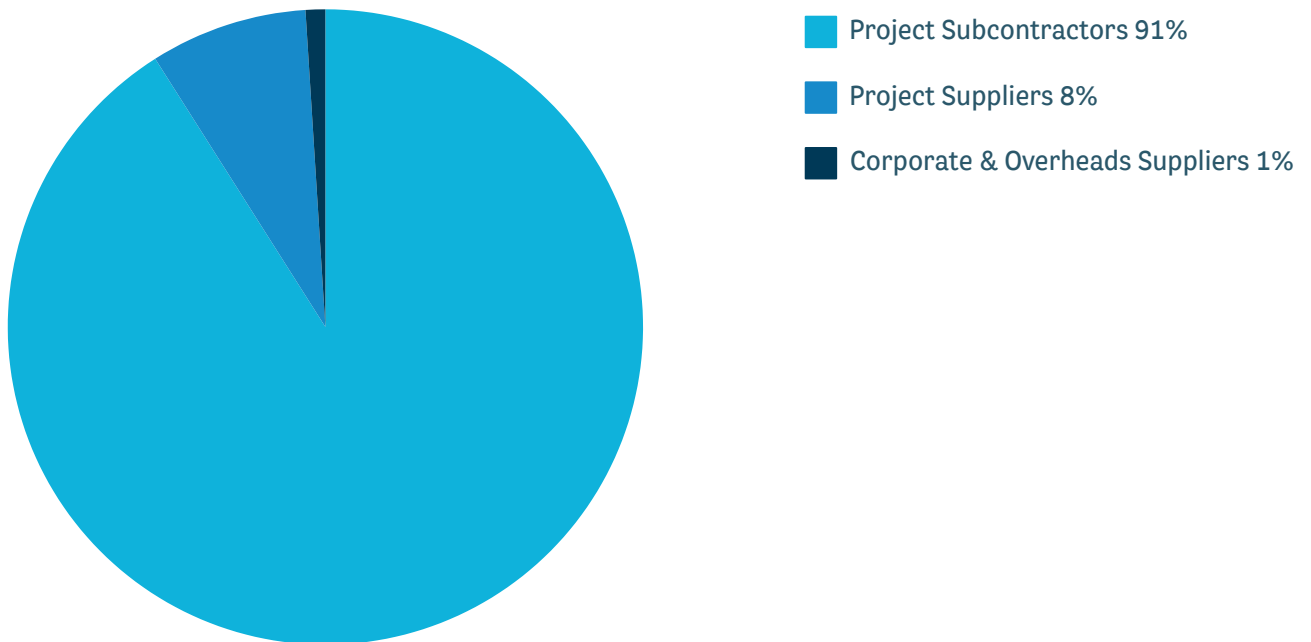


SUPPLY CHAIN PROCUREMENT

Mainbrace as a head contractor manage the construction process and is largely dependent on our suppliers and subcontractors to procure the goods and services used directly and indirectly in our business.

In FY25 our supply chain consisted of 2,126 Australian based entities distributed across the business as follows:

FY25 MAINBRACE SUPPLY CHAIN OVERVIEW



The median spend with suppliers in our supply chain amounted to \$18,100.00 + GST, and an average spend of \$204,597.00 + GST.

Group corporate procurement consisting of our offices, consumables, equipment, and technology totalled 1% of our supply chain spend with our projects under construction amounting to 99% of our spend.

In FY25, all subcontractors and suppliers from whom Mainbrace procured goods and services were based in Australia. Despite this local focus, we acknowledge that our supply chain reaches beyond Australian borders. As a result, there is an increased potential for modern slavery practices to occur within the overseas elements of our supply chain.

To maintain the integrity of our operations, Mainbrace employ a documented procurement procedure incorporating supplier performance management processes. This multi-level approval process ensures what is supplied meets the expectation of our business and is fit for their intended purpose.

RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS & SUPPLY CHAINS

Due to the nature upon which our direct employees are engaged there is no risk of modern slavery in this element of our operations.

Determining the risk and extent of modern slavery practices within our broader supply chain presents significant challenges. One of the foremost difficulties stems from the lack of transparency associated with extended supply chains. Modern slavery practices are inherently covert and often operate underground, making them difficult to detect and assess accurately.

The Global Slavery Index 2023 provides that the top five imported products into Australia at risk of modern slavery are electronics, garments, solar panels, textiles and fish. Of the five, electronics, garments and solar panels feature in our supply chain. However, we additionally acknowledge that there will be numerous other products ultimately procured from overseas markets which could have been produced by labour working in unregulated labour conditions.

The extended labour resources used in our operations and the physical construction process on our projects present a very low risk for the existence of modern slavery practices. However, it is important to recognise that certain trades within the construction industry may present a heightened risk profile. Cleaning, security and general labour hire in which low skilled, unskilled and temporary workers are employed can be more susceptible to practices associated with modern slavery due to the vulnerability of workers.





GABLES

ACTIONS TAKEN TO ASSESS AND ADDRESS THE RISK OF MODERN SLAVERY PRACTICES

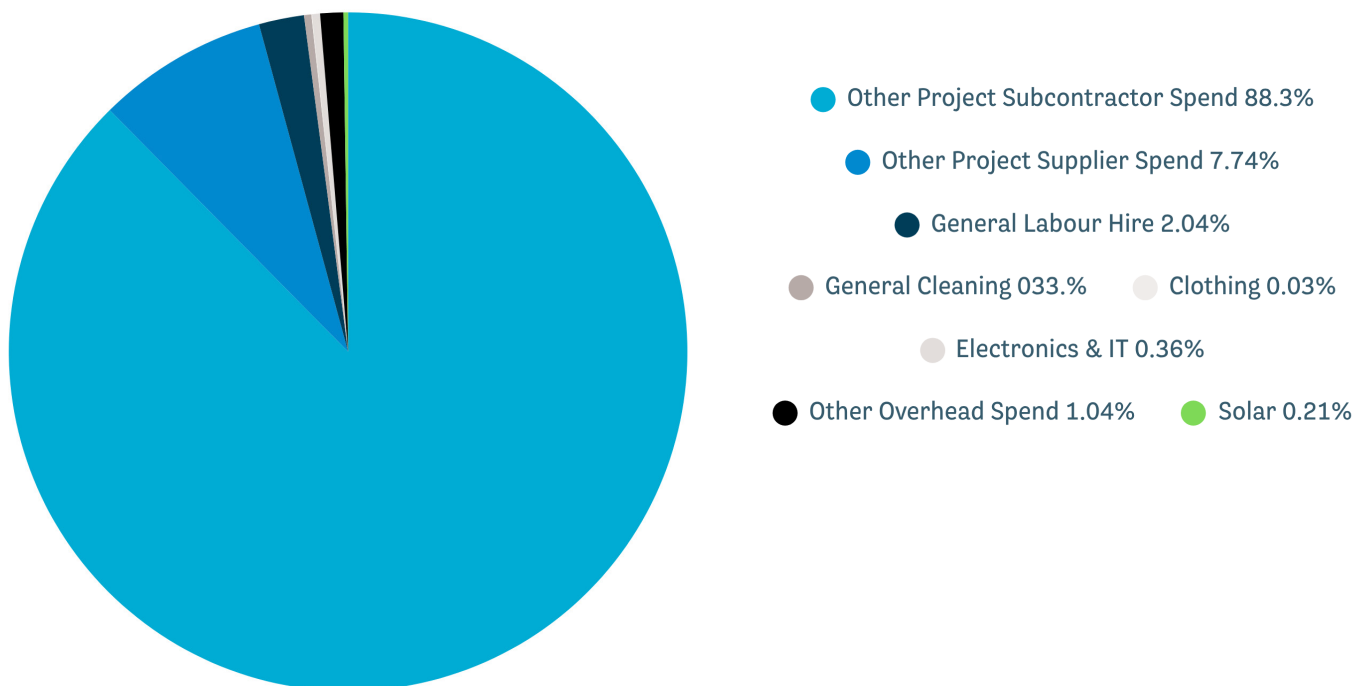
Due Diligence

In our previous statements we outlined our commitment to focus our resources where we could influence change with our larger immediate suppliers and also target those areas of our supply chain considered to potentially pose a higher risk for the existence of modern slavery practices.

To ensure our strategy remains current it was necessary to again in FY25 consider our supply chain and our spend data.

The resultant cost data provided the following:

FY25 SUPPLY CHAIN DUE DILIGENCE



While we acknowledge that modern slavery has the propensity to exist anywhere in our supply chain, from this macro perspective there was a lesser risk of modern slavery practices being employed in 96.81% of our FY25 supplier spend with only 3.19% of our spend representing potentially high-risk suppliers.

In comparison to FY24 our spend on potentially high-risk suppliers marginally decreased from 3.33% to 3.19% however it is also recognised that our spend on solar increased from 0.09% to 0.21% in FY25.

The actions taken in FY25 to address supply chain risk are described in the next section.

ACTIONS TAKEN

Supply Chain Risk Assessment

To assess the potential risk of modern slavery practices existing in our immediate supply chain and our higher risk suppliers we continue to use our modern slavery questionnaire to educate our supply chain on modern slavery risk and to assess their policies and procedures in relation to modern slavery.

Key Findings

- Our supply chain's reporting obligations under the Act remains comparatively low.
- Education of our immediate supply chain remains key to mitigating modern slavery risk. Most new suppliers who participated in our questionnaire have only basic awareness or are not aware of the Modern Slavery Act.
- Our immediate supply chain participation rate in the completion of our questionnaire continues to improve since the introduction of our internal process audit.
- Visibility, verification and monitoring of modern slavery risk in our supply chain continues to be generally low.

Recommendations

- Continue to use our procurement process to educate our direct supply chain on the intent of the Act.
- Continue with the use of internal process audits to ensure all new suppliers complete our modern slavery questionnaire prior to works being awarded.

Modern Slavery Awareness Training

General awareness training continues to be undertaken with specific training on our procurement policies and procedures to address modern slavery provided to new and existing members in our procurement teams.

Procurement Policies and Procedures

We continued to employ our standard methodology in the procurement of goods and services on our projects in FY25 to educate our primary supply chain on the risks of modern slavery and to contractually obligate them to assess and address modern slavery risk.

Remediation Process

At present, we have not identified, nor have we been informed of, any instance in which our business practices have caused or contributed to modern slavery. Should an instance become known we will cooperate in the investigation of the circumstances and partake in the remediation of the impact in accordance with The UN Guiding Principles.





ASSESSMENT OF THE EFFECTIVENESS OF OUR ACTIONS TAKEN

As a business operating solely in Australia and as such in an environment in which there is a low risk of modern slavery practices existing, we have determined that our actions to date have been effective in promoting modern slavery awareness within our business, amongst our primary suppliers and amongst our higher risk suppliers.

Our experience to date reinforces the importance of ongoing efforts to raise awareness and provide education on modern slavery, ensuring that our supply chain partners can identify and address risks within their businesses and beyond.



PROCESS OF CONSULTATION

To ensure our business operations align with our modern slavery obligations consultation continues with senior management involved in the operations of the business.

From an industry consultation perspective, we continue to collaborate with our key strategic clients to jointly address and mitigate the risk of modern slavery within our construction operations. These partnerships are essential, particularly given that supplier resources are frequently shared across different projects, which can increase the complexity of managing modern slavery risks.

To further strengthen our approach, we now participate in client governed on-site compliance audits. These audits serve as an additional layer of oversight, ensuring that both our practices and those of our suppliers are continuously monitored and assessed against modern slavery risk factors. Through this collaborative auditing process, we work closely with our clients to uphold high standards of ethical conduct.



OTHER RELEVANT INFORMATION

CONTINUOUS IMPROVEMENT

Our modern slavery strategy is built on progressive leadership within our business to increase awareness of the issue which together with a framework of continuous improvement in our policies and processes and the on-going education and training of our employees will together serve to exclude modern slavery practices from our operations and supply chains.

Over the FY26 financial year our key actions will be to:

- Provide modern slavery training to our teams so they can support our broader objective to eliminate any such practices from our operations and supply chain and so that we can empower our teams to identify, report, and address any instances of modern slavery if found;
- Continue with the use of process audits to ensure we have adequate governance over our commitment to address the risk of modern slavery in our operations;
- Continue to increase our supply chains awareness of the risk of modern slavery practices by educating our primary supply chain on what is modern slavery and by providing them with access to modern slavery resources; and
- Seek learning, consultation and collaboration opportunities with our Industry peers and other stakeholders to address modern slavery.

APPROVAL

The Board of Mainbrace has approved this single statement on behalf of Mainbrace Constructions Pty Limited and Mainbrace Constructions (QLD) Pty Limited on 03 December 2025.



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