



Total Construction Holdings Pty Ltd (ABN 69 131 766 820)

Financial Year 2021/22 Statement of Commitment

to the Modern Slavery Act 2018.

22nd December 2022

Reporting Entity and structure

Total Construction Holdings Pty Ltd (hereafter "Total", "we", "our", "us") provides this statement on behalf of both of its wholly owned subsidiaries, Total Construction Pty Ltd (ABN 32 067 732 941) and Total Special Projects Pty Ltd (ABN 19 137 910 840).

Operations and supply chain

We are a commercial construction company that has permanent offices in Sydney, Melbourne and Brisbane and conduct our delivery operations solely within Australia. We provide innovative construction solutions across the aged care, health, food, beverage, commercial, industrial and education sectors. We strive to work with stakeholders who are aligned with our core values of: Accountability | Integrity | Mentorship | Respect | Collaboration | Ingenuity.

Identification of the risks of modern slavery practices within our operation and supply chain

We pride ourselves on our strong commitment to ethical business practices. To this effort, our teams are committed to our core purpose of *making a positive difference in people's lives through excellence in construction*, including by extension our responsibility to align with practices that identify and manage modern slavery risks through the *Modern Slavery Act 2018*.

As a construction company, we understand that we face an elevated risk of modern slavery within our operations and supply chain because of the demand for base-skill workers who are vulnerable to exploitative practices, and for raw materials that are often sourced from high-risk geographies. This is further exacerbated by poor visibility over long and complex supply chains. We acknowledge that we operate in a business that is reliant on a diverse range of suppliers and products that can potentially leave our business exposed.

Actions taken towards assessing and addressing modern slavery risks and impacts

Our aim is to mitigate the risk of modern slavery practices by applying a systematic approach which included the following actions:

- We have formed a dedicated internal committee that is chaired by our CEO and meets regularly to review the effectiveness of our modern slavery statement and plan and ensure continual improvement.
- We display modern slavery guidance material in all offices including construction site offices.
- We have developed and rolled out modern slavery eLearning modules to our employees to educate them on modern slavery risks.
- We have implemented requirements within the tender and procurement phase (e.g. within our standard terms and conditions in subcontracts) for our supply chain to warrant that they will assist us in achieving the objectives of

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our modern slavery statement.

- We have developed internal and external reporting channels for the purposes of monitoring and reporting grievances via a whistleblower mechanism that is available to our staff, supply chain participants, as well as the general public.

In around May 2022, a Consortium made up of several Australian construction companies (including Buildcorp Group, Lipman, Mainbrace Constructions, Richard Crookes Constructions and Total) initiated a project (called the T&T project) to track and trace the supply chain of common suppliers across areas of high-risk categories based on spend and likelihood including structural steel, electrical instruments and components and heavy machinery. The project is in progress. Results including any improvements achieved will be reported in our next Statement.

Assessment of the effectiveness of actions taken

Our Modern Slavery committee is charged with the responsibility of measuring and reviewing the effectiveness of actions mentioned above and reporting to the board of directors on a half yearly basis. Measurements include:

1. Completion of specific deliverables.
2. Competency of trained staff.
3. Adherence to the new system elements.

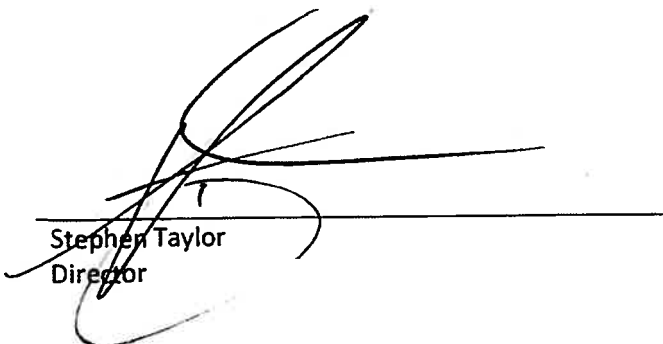
Process of consultation with all entities within the group

All entities within the group share the same corporate governance function and therefore the elements of both this statement and the modern slavery plan across Total are consistently applicable and do not require additional consultation.

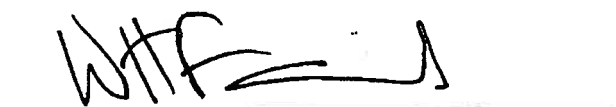
Other Information considered relevant

We recognise that financial hardship can contribute to increasing the risk of modern slavery within our supply chain and have therefore placed additional resources and focus on our accounts payable function to mitigate disruptions to our payment process.

This statement has been approved by the Board of Directors of Total for the reporting entity on the 22nd December 2022.



Stephen Taylor
Director



William Franks
Director