

Modern Slavery Statement for Robson Civil Projects Pty Ltd

1 Introduction

Robson Civil Projects Pty Ltd (Robson) is committed to ensuring that modern slavery, in any form, is not present in our operations or supply chains. This statement is made in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)* and outlines the steps Robson is taking to identify, assess, and mitigate modern slavery risks within our business.

2 Our Structure and Operations

Robson Civil Projects is a privately owned civil construction company with over 60 years of experience in delivering projects across NSW. Our services span civil construction, infrastructure, earthworks, structures, subdivisions, and roadworks. Robson employs a direct workforce and works with subcontractors and suppliers to deliver high-quality outcomes for our clients.

3 Our Supply Chain

Robson works with a wide network of suppliers and subcontractors to source materials and services, including equipment, raw materials, and professional services. Our supply chain spans both local and international suppliers. Robson recognises that complex global supply chains may have modern slavery risks, especially where goods and services are sourced from regions with less stringent labour laws or oversight.

4 Risks of Modern Slavery in Our Operations and Supply Chain

Robson acknowledges that the construction industry is vulnerable to modern slavery risks, particularly in the areas of:

- Labour exploitation in construction activities, particularly where subcontracting occurs.
- Sourcing materials from suppliers, especially in countries where forced labour and child labour may be present.
- Use of temporary, migrant, or contract labour, which may involve higher risks of exploitation.

We are committed to continuously assessing and understanding these risks across our operations and supply chain.

5 Actions to Address Modern Slavery Risks

Robson is implementing the following actions to mitigate and address modern slavery risks:

5.1 Supply Chain Due Diligence:

- Commenced risk assessments for all suppliers with annual spend greater than \$1,000,000. A phased approach is planned, with suppliers exceeding \$500,000 spend to be assessed in FY26.
- Purchase order contracts have been updated to include modern slavery clauses to strengthen accountability and compliance with ethical standards.
- Our supplier pre-qualification system is being upgraded to include Modern Slavery risk screening and compliance checks.

5.2 Supplier Engagement:

- Notification letters and questionnaires were distributed to all suppliers with an annual spend exceeding \$1,000,000, outlining our modern slavery expectations and requesting information to support our risk assessment process. This process will be progressively extended to all suppliers throughout FY26 and FY27.
- Suppliers have been asked to provide evidence of their own modern slavery risk assessments and mitigation actions where applicable.
- Our supplier questionnaire also captures Modern Slavery awareness and expectations, allowing us to provide targeted support.

5.3 Training and Awareness:

- Training has commenced for all consumer-facing and senior staff to improve awareness of modern slavery risks and reporting obligations. A full staff training rollout is planned for FY26.
- Procurement and commercial staff have received general training during FY25, with targeted training in responsible sourcing and ethical supply chain management practices to be considered for Q4 FY26.

5.4 Grievance Mechanism:

- A formal grievance policy has been approved, providing a confidential mechanism for employees, subcontractors, and suppliers to report concerns, including unethical practices or modern slavery risks.
- An investigations team has been established to ensure that any complaints are thoroughly assessed, and appropriate actions are taken.

5.5 Governance and Oversight:

- Robson has appointed a dedicated Modern Slavery Compliance Officer responsible for coordinating the implementation of our modern slavery framework. This role oversees supplier risk assessments, policy compliance, training initiatives, and reporting obligations.
- The Compliance Officer also acts as a central point of contact for internal and external stakeholders, helping to ensure consistent application of ethical sourcing practices and alignment with our Modern Slavery Policy.

6 Assessing Effectiveness

To assess the effectiveness of our modern slavery risk management efforts, Robson will:

- Review and monitor supplier compliance with contractual obligations related to modern slavery. There have been no indications of non-compliance to date.
- Track and report on any instances of modern slavery identified and the steps taken to address them. No incidents were reported in FY25.
- Regularly review and update our internal policies and processes to ensure they remain effective and relevant to emerging risks. A full policy review is planned for June 2026.

7 Consultation and Collaboration

Robson recognises the importance of working collaboratively with industry peers, suppliers, and stakeholders to combat modern slavery. We engage in regular consultation with our suppliers and subcontractors and participate in industry forums to share best practices for addressing modern slavery risks.

8 Looking Forward

Robson is committed to ongoing improvement in the fight against modern slavery. In FY25, we commenced our supplier risk assessment process by distributing a Modern Slavery Questionnaire to high-spend suppliers, notifying them of our expectations and supporting them in identifying and managing modern slavery risks within their operations and supply chains. We will continue to refine our risk assessment processes, strengthen our supplier relationships, and expand our training program to ensure we uphold the highest standards of ethical conduct in all our operations.

9 Approval

This statement was approved by the Board of Robson Civil Projects Pty Ltd on 04/12/2025.



GRANT ROBSON

Managing Director
Robson Civil Projects Pty Ltd
04/12/2025