

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. FCC have a zero-tolerance approach to modern slavery, and we are committed to acting and responding to this problem in line with our vision to improve the quality of life and contribute to the development and wellbeing of the communities we work in.

At FCC we are committed to ensuring there is transparency in our own business and in our approach to the prohibition of modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act (2018) (the Act). We implement and enforce effective systems and controls to all our contractors, suppliers and other business partners, and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

This statement applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. This statement is to be read in conjunction with the FCC Human Right Policy of the FCC Group. This statement was approved by the principal governing body of FCC Construction Australia Pty Ltd on the 1st of March 2026.

Modern Slavery is a growing problem, and only by being vigilant as a company can we look to address the issue. We understand that complicated supply chains pose the greatest risks for vulnerable workers and therefore this is where our greatest efforts have been and continue to be concentrated.

OUR REPORTING ENTITY

FCC Construction Australia Pty Ltd is a subsidiary of FCC Construcción (Spain), hence this annual modern slavery statement relates to FCC Construction Australia Pty Ltd (ABN 31 640 182 163) exclusively (FCC Construction Australia Pty Ltd does not own or control any other entities).

OUR ORGANISATION, OPERATIONS AND SUPPLY CHAINS

Organisation and Operations

FCC Construction Australia is a subsidiary of FCC Construcción (Spain), part of the global FCC Group. Our Australian head office is based in Melbourne, Victoria, with a presence in Sydney and Queensland.

The group operates within a decentralised international model, where local subsidiaries manage projects with autonomy while leveraging global expertise. FCC Construcción specialises in large-scale infrastructure and civil engineering projects worldwide.

The company's activities span a wide range of construction sectors, with a strong emphasis on civil engineering works. FCC Construcción has been heavily involved in the development of transport infrastructure such as highways, high-speed rail systems, metro networks, tunnels, and bridges. These projects often require advanced technical capabilities and coordination, positioning the company as a specialist in challenging engineering environments. In addition

to transport infrastructure, it also undertakes major building projects, including hospitals, airports, commercial complexes, and residential developments.

International expansion has been a key part of FCC Construcción's strategy. While Spain remains an important base, the company has established a significant presence in regions such as Latin America, the United States, the Middle East and Australia. This global footprint allows it to participate in large public and private sector projects, often through partnerships or joint ventures. Its involvement in high-profile developments, including metro systems and large transport corridors, reflects its capacity to manage projects that require both scale and technical sophistication.

A defining characteristic of FCC Construcción is its integration within the broader FCC group. This connection enables collaboration with other divisions specialising in environmental services, water management, and urban services, allowing the company to deliver comprehensive infrastructure solutions rather than standalone construction projects. This multidisciplinary approach is increasingly important in modern infrastructure, where sustainability, efficiency, and lifecycle management play a central role.

FCC Construction Australia operates within the Australian construction industry, delivering complex infrastructure and building projects. It leverages the global expertise of its parent group, which operates in more than 25 countries, while its Australian business primarily relies on local workforces, subcontractors, and suppliers to deliver projects. FCC's activities involve labour intensive construction work, engagement of subcontractors, and the sourcing of construction materials and services.

FCC's processes outlines how modern slavery risks are identified through operational assessments, supply chain mapping, due diligence processes, and worker engagement. This approach includes site inductions, worker interviews, evaluation of labour hire practices, review of recruitment arrangements, and monitoring for indicators such as retained personal documents, recruitment fees, excessive overtime, or inadequate accommodation. Supply chain risks are further identified through prequalification questionnaires, contractual safeguards, and targeted audits, with particular attention given to higher-risk sectors and materials.

Supply Chain

FCC recognises that the construction sector faces an elevated risk of modern slavery within its operation and supply chain. The FCC supply chain is designed to support large-scale infrastructure and building projects worldwide. It begins with strategic procurement of construction materials, machinery, and specialised services from both global and local suppliers. The company emphasises long-term relationships, competitive tendering, and compliance with technical and regulatory standards, while adapting sourcing strategies to local markets. In Australia, our employees predominately hold professional and administrative roles. They have the benefit of our corporate policies, operating standards and procedures which include the requirements for compliance with applicable laws and regulations, as well as their contractual entitlements. These are designed to ensure our supply chain comply with any relevant industrial instrument and/or local employment laws.

Logistics and project coordination are central to FCC's supply chain, particularly for complex projects like tunnels, rail systems, and urban infrastructure. Materials and equipment are carefully scheduled and transported to construction sites, often requiring international

shipping and just-in-time delivery. The supply chain is closely integrated with project planning and engineering functions, enabling efficient execution while maintaining technical standards.

FCC engages suppliers through prequalification processes and modern slavery due diligence questionnaires, reinforced by contractual obligations (including audit and corrective action rights), risk-based monitoring, and ongoing communication of expectations regarding lawful recruitment, worker protections, and ethical sourcing.

Sustainability and regulatory compliance are also prioritised, ensuring ethical sourcing, reduced environmental impact, and alignment with government requirements on public infrastructure projects. Overall, the supply chain balances global expertise with local adaptability to reliably deliver complex construction projects.

The goods and services that we procure from suppliers range from basic construction materials such as concrete and steel to sophisticated machinery such as drones, specialised machinery for tunnelling and civil works, simultaneously comply with the policy of local content in terms of job creation and stimulation of local economy.

Supply chain risks

FCC works with suppliers and subcontractors across a range of categories, including construction services, building materials, labour hire, professional services, plant and equipment, and corporate services. Although the majority of suppliers are based in Australia, some materials and manufactured products are sourced internationally. FCC acknowledges the increased risk of modern slavery associated with the importation of goods from international suppliers (especially those which are classified as higher risk by the Global Slavery Index). We consider the following risk factors to inform our risk analysis: country of operation, category of supplier service, resources used in goods and type of workforce.

Commitment to Addressing Modern Slavery Risks

FCC recognises its responsibility to identify, assess, and address modern slavery risks across its operations and supply chains. As part of our prequalification process, all subcontractors and suppliers are required to complete a procurement pre-award evaluation.

In line with the intent of the Act and the UN Guiding Principles on Business and Human Rights, we apply a risk-based, proportionate, and continuously improving approach to modern slavery due diligence. The risks of modern slavery can arise within the construction and property development sectors due to complex subcontracting structures, labour-intensive work, and extensive supply chains. Our modern slavery clauses may operate to ensure that suppliers and subcontractors respond to modern slavery risks within their operations and provide an opportunity to initiate dialogue and engagement with our supply chain where there is a material breach of contract.

Accordingly, controls are embedded across governance, procurement, site operations, and supply chain management to prevent, detect, and respond to these risks. The ways in which we measure effectiveness are listed below. Insights gathered from these measures inform our Modern Slavery strategy and the scope of work for the Australian Management Committee (AMC).

AMC Governance

FCC recognises the importance of top down engagement on the subject of modern slavery. The Australian Management Committee (AMC), oversees modern slavery risks across FCC's operations and supply chains, while setting strategic priorities and targets. The AMC acknowledges that the construction sector carries inherent modern slavery risks, driven by factors such as complex subcontracting structures, reliance on labour hire, time-sensitive delivery pressures, and the sourcing of certain high-risk materials.

To mitigate these risks, the AMC defines expectations for ethical procurement, labour standards, and subcontractor behaviour, and ensures that processes for monitoring progress and addressing challenges are consistently applied across projects. Specifically, the AMC:

- Endorses and oversees modern slavery risk management frameworks and policies, including the FCC Human Right Policy of the parent group and FCC Anti-Slavery Human Trafficking Policy of FCC Australia.
- Receives regular updates on labour risk assessments, site inspections, subcontractor compliance, and any identified issues.
- Mandates corrective actions and remediation where gaps or deficiencies are identified.
- Embeds modern slavery considerations within broader risk, safety, sustainability, and procurement governance frameworks.

The AMC also holds FCC leadership accountable for managing modern slavery risks by incorporating responsibilities into executive, project leadership, procurement, and compliance roles. The AMC reviews risk reports, challenges the effectiveness of controls, and requires timely remediation where necessary. Modern slavery obligations are integrated into FCC's enterprise risk management and supply chain governance frameworks, ensuring accountability from the tendering stage through to project delivery. Furthermore we have sought external advice to help test the adequacy and robustness of our modern slavery approach, risk and assessment and controls.

Assessing modern slavery risk

- **Contractual controls:** Embed modern slavery and ethical labour requirements into supplier and subcontractor agreements, including provisions for audits and corrective actions.
- **Risk-based assessment:** Conduct project-specific risk assessments for standard operating procedures, focusing on labour hire, subcontracting tiers, and higher-risk materials.
- **Verification:** Undertake targeted site inspections and audits (including payroll and recruitment reviews where relevant), alongside worker engagement activities.
- **Worker voice:** Provide confidential reporting mechanisms and promote worker awareness through inductions and toolbox talks.
- **Continuous improvement:** Maintain and update risk registers, enhance training, and refine procurement controls based on insights and lessons learned.

Compliance

FCC evaluates compliance with modern slavery legislation through:

- **Operational controls:** Site-level practices support compliance, including worker onboarding and induction, right-to-work checks, and monitoring for indicators such as retained documents, excessive working hours, or coercive behaviour.
- **Supply chain due diligence:** Subcontractors and suppliers undergo pre-engagement assessment through questionnaires and risk screening, with enhanced review applied to higher-risk categories (e.g. labour hire, PPE, imported materials).
- **Audit and verification:** FCC conducts targeted audits and site reviews and may rely on third-party verification or certifications where appropriate. Instances of non-compliance trigger corrective action plans and may lead to termination of engagement.
- **Worker reporting:** Confidential reporting channels, supported by non-retaliation principles, enable early identification and response to potential issues.

Monitoring and tracking our progress

FCC adopts a victim-focused and legally compliant approach to escalation and remediation:

- **Immediate protection:** assess risks, safeguard affected individuals, and pause or modify work where required
- **Investigation:** carry out structured investigations (including document reviews, site inspections, worker interviews, and labour-hire verification), engaging independent experts where appropriate
- **Corrective action:** require contractors or suppliers to implement remediation measures (such as reimbursing fees, correcting underpayments, or improving working conditions), with FCC oversight and validation
- **Escalation and reporting:** escalate matters internally to senior leadership and externally to relevant authorities where necessary
- **Prevention:** update risk registers, supplier controls, and training programs based on findings and lessons learned

Structured Assurance

FCC evaluates the effectiveness of its response to modern slavery risks through a structured assurance framework that integrates operational oversight, performance measurement, independent verification, and leadership review:

- **Operational monitoring and verification:** Project and site leaders routinely assess working conditions, payroll practices, labour-hire arrangements, and accommodation (where applicable) to ensure risks have been addressed and corrective actions remain effective. Progress is tracked through to closure, with confirmation that improvements are both implemented and sustained.
- **Supply chain assurance:** Ongoing due diligence, targeted audits, and follow-up reviews are used to monitor supplier and subcontractor compliance, with particular attention to higher-risk suppliers such as labour-hire providers and importers of materials. Outcomes are recorded in risk registers and inform decisions on continued engagement, escalation, or disengagement.

- **Leadership oversight:** Performance metrics, audit results, and incident trends are reported to senior management and the Australian Management Committee, enabling evaluation of control effectiveness, identification of systemic issues, and direction of improvements across policies, procurement, training, and site practices

Continuous Improvement

FCC applies a continuous improvement approach to strengthen early identification and mitigation of modern slavery risks across its operations and supply chains:

- **Dynamic risk assessment:** Risk assessments are regularly reviewed and updated to reflect changes in project scope, delivery models, subcontracting arrangements, supply chains, and sourcing locations. Higher-risk activities—such as labour hire, use of migrant workers, and procurement of certain materials—receive enhanced scrutiny.
- **Data-driven insights and learning:** Insights from audits, site inspections, worker feedback, grievance channels, and incident investigations are analysed to identify emerging trends and systemic gaps. Lessons learned are used to refine risk indicators, strengthen controls, and improve supplier screening.
- **Integrated cross-functional oversight:** Procurement, site management, HR, safety, and compliance teams work collaboratively to identify and address risks early in the project lifecycle, including during tendering, package design, and subcontractor selection—ensuring a proactive rather than reactive approach.
- **Strengthening supplier and subcontractor engagement:** Supplier prequalification and onboarding processes are continuously enhanced, with a focus on recruitment practices, use of labour intermediaries, subcontracting transparency, and worker protections. Ongoing monitoring supports early identification of emerging risks.
- **Capability building and worker empowerment:** Training for project leaders, procurement teams, and supervisors improves recognition of warning signs such as retained documents, excessive overtime, or inadequate accommodation. Toolbox talks, surveys, and confidential reporting channels empower workers to raise concerns early.

Supplier adherence to our Values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and our contractors comply with our values, ethics and policy, we have in place a supply chain compliance programme.

All suppliers (new and existing) must confirm conformance to our Code of Conduct and policy or, alternatively, confirm that they have policies of their own with which they comply.

Modern Slavery Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, FCC have developed a modern slavery training module. The module is designed to raise awareness about modern slavery and provide guidance on how to recognise and respond to modern slavery. The training is provided to all employees, with particular emphasis on employees who may have a high exposure to modern slavery due to their position or nature of their work.

Combating Slavery and Human Trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

Key performance indicators and trend analysis: Effectiveness is measured using a combination of leading and lagging indicators such as:

- completion rates and quality of modern slavery due diligence questionnaires
- proportion of higher-risk suppliers subject to audit or verification
- timeliness and effectiveness of corrective actions
- worker engagement metrics, including feedback from toolbox talks, surveys, and grievance channels
- number, nature, and outcomes of reported concerns

FCC understand that Modern Slavery risk is not static, and we will continue to seek to mitigate the risks in the years ahead. We will assess the effectiveness of the measures being taken by monitoring, staff training, supply chain audit and verification and investigations into reports of Modern Slavery.



Azam Sattar | Director
FCC Construction Australia

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