

Vaughan Civil Pty Ltd Modern Slavery Statement – FY2024/2025

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) following Vaughan Civil's review of its operations and supply chains, in compliance with the reporting obligations under the Act for the financial year ending 30 June 2025.

The Statement addresses the seven mandatory reporting criteria under section 16 of the Act, as well as current legislative requirements and best practice, as follows:

1. Identify the reporting entity.
2. Describe the structure, operations and supply chains.
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.
4. Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address these risks, including due diligence and remediation processes.
5. Describe how the reporting entity assesses the effectiveness of these actions.
6. Describe the process of consultation with any entities the reporting entity owns or controls.
7. Any other relevant information.

1. REPORTING ENTITY

This Statement has been prepared and submitted under section 13 of the Modern Slavery Act 2018 (Cth) by Vaughan Civil Pty Ltd (ABN 50 152 638 447) as a single reporting entity. It outlines Vaughan Civil's strategy to identify, mitigate, and prevent modern slavery risks within its operations and supply chains, including ensuring full compliance with the Act's reporting and enforcement provisions.

2. STRUCTURE, OPERATIONS & SUPPLY CHAIN

STRUCTURE

Vaughan Civil Pty Ltd is a 100% Australian-owned private company with its registered office in New South Wales. Established in 2011, Vaughan Civil has grown to become one of Australia's leading privately owned civil construction companies.

OPERATIONS

Vaughan Civil provides a diverse range of civil and infrastructure construction services to both government and private sector clients.

- Our operations are limited to Australia, but we acknowledge that risks may still arise through indirect supply chain relationships.
- We are primarily engaged in the design and construction of utility and infrastructure projects, with head contracts executed only with Australian-based clients

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SUPPLY CHAIN

Our supply chain consists predominantly of Australian suppliers and subcontractors, supporting local procurement policies and providing greater oversight.

However, certain technical and complex projects may require specialist materials or equipment sourced from international suppliers. Where this occurs, we recognise the increased risk of modern slavery practices and apply enhanced due diligence.

Key features of our supply chain governance include:

- Comprehensive vendor pre-qualification and auditing.
- Ongoing engagement and education to align suppliers with Vaughan Civil's values and policies.
- Inclusion of mandatory modern slavery clauses in all supplier contracts.
- Promotion of grievance and whistleblower mechanisms to suppliers and workers.

3. MODERN SLAVERY RISKS IN OPERATIONS AND SUPPLY CHAINS

Our annual review identified the following key risk factors:

NATURE OF WORKFORCE

- The construction industry can involve vulnerable workers due to its reliance on subcontracting and labour hire.
- Competitive tendering processes may increase risks of wage exploitation or poor conditions.

HIGH-RISK CATEGORIES

- Certain categories, such as labour hire, are inherently high risk.
- Price-focused tenders may unintentionally encourage cost-cutting behaviours leading to exploitative practices.

LONG AND COMPLEX SUPPLY CHAINS

- While Vaughan Civil operates domestically, some materials may originate from countries or industries with a high prevalence of modern slavery, such as manufacturing or raw materials extraction.
- This creates risks beyond our direct Tier 1 suppliers.

4. ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

Vaughan Civil has strengthened its policies, processes, and governance to mitigate modern slavery risks and to comply with current enforcement provisions and penalties under the Modern Slavery Act.

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PROCUREMENT & DUE DILIGENCE

Our procurement process incorporates modern slavery risk assessment from pre-qualification to ongoing contract management:

- Risk-based evaluation of suppliers considering sustainability, industrial relations, and safety practices.
- A Modern Slavery Audit Questionnaire included in all tenders and quotations.
- Supplier obligations to comply with modern slavery laws and to actively identify and remediate risks.
- Yearly audits of the top ten high-value or high-risk suppliers, including those sourcing internationally.

REMEDIATION PROCESSES

To meet legislative obligations, Vaughan Civil has:

- Established procedures for prompt investigation and remediation of any identified modern slavery incidents.
- Developed escalation protocols and corrective action plans in collaboration with affected suppliers or workers.
- Provided training for procurement and project management teams on remediation best practices.

GRIEVANCE MECHANISMS

To increase transparency and accessibility:

- A confidential Whistleblower Policy is available to employees, suppliers, and other stakeholders.
- Reporting mechanisms are designed to be safe, anonymous, and free from retaliation.
- All grievances are tracked, with outcomes recorded and reported to senior leadership.

5. MEASURE OF EFFECTIVENESS OF ACTIONS

To assess the effectiveness of our actions, Vaughan Civil has implemented the following key performance indicators (KPIs):

- Audit Completion Rate: Percentage of high-value and high-risk suppliers audited annually.
- Supplier Compliance: Number of suppliers meeting modern slavery contractual obligations.
- Grievance Tracking: Volume and resolution time of grievances received through the whistleblower system.
- Remediation Outcomes: Documented corrective actions completed within agreed timelines.

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- Training Completion: Percentage of staff trained in modern slavery awareness and procurement due diligence.

These metrics are reviewed quarterly by senior management and reported to the Board.

6. CONSULTATION WITH OWNED OR CONTROLLED ENTITIES

Vaughan Civil is a single reporting entity but actively consults across its business units and subsidiaries to ensure group-wide alignment.

- Business Unit Leaders provide feedback and data for inclusion in this Statement.
- Staff are trained on the implications of the Act and current compliance requirements.
- Consultation processes are continually reviewed to ensure compliance with legislative obligations.

7. OTHER RELEVANT INFORMATION & FUTURE COMMITMENTS

Vaughan Civil acknowledges the importance of ongoing compliance with the Modern Slavery Act and its enforcement framework, which now includes civil penalties for non-compliance, such as failure to submit a statement, providing false or misleading information, or failing to implement required actions.

Future commitments include:

- Expanding our supplier audit program to deeper levels of the supply chain.
- Increasing training for both internal teams and key suppliers.
- Publishing a Modern Slavery Roadmap outlining milestones for continuous improvement.
- Publicly reporting on remediation cases and lessons learned

APPROVAL

This Statement has been approved by the governing body of Vaughan Civil Pty Ltd and signed by Joe Vaughan, Sole Director.

Dated 24/09/2025

Joe Vaughan

Managing Director

