



## INTRODUCTION

Fulton Hogan Australia Pty Ltd (FHA) submits this Modern Slavery Statement for the financial year ending 30 June 2025.

This joint statement is provided in accordance with the *Modern Slavery Act 2018* (Cth) (Modern Slavery Act) and sets out the actions taken by FHA and its wholly owned and controlled entities to identify, assess and address modern slavery risks in its operations.



## OUR COMMITMENT

Fulton Hogan is committed to acting ethically and with integrity and transparency in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We recognise our responsibility to work with various stakeholders to identify internal and supply chain risks of modern slavery practices and addressing those risks through training, contract management and good governance practices.

In order to achieve that purpose, FHA adopted a uniform Anti Modern Slavery Process in 2019 which provides mandatory requirements and guidance on how to identify and prevent modern slavery in FHA and its supply chains. The process requires FHA to undertake the key actions described here in.



# OUR REAL VALUES

Our people are the most important part of our business, and our values are a way to keep the whole Fulton Hogan family on the same page. Keep us REAL.

## Respect

We understand, listen and learn

We respect our differences

We take care of ourselves and others

We treat others the way they expect to be treated

## Energy & Effort

We bring out the best in everything we do

We do it once, we do it right

We never give up

We keep things simple

We have fun

## Attitude

We are one Fulton Hogan

We Take pride in everything we do

We do what we say

We challenge and improve

We work together, win together and celebrate together

## Leadership

We value and grow our people

We do the right thing

We are fair and trustworthy

We are accountable

The standard we walk past is the standard we set

We are humbly smart

# OUR OPERATIONS AND STRUCTURE

1933

Founded in  
New Zealand



1981

Fulton Hogan  
commences  
operations in  
Australia



Fulton Hogan is a leading infrastructure and civil engineering company with over 92 years' experience in the infrastructure, transport, water, and telco sectors and during the reporting period employed approximately 4,300 people in regional and city-based locations across Australia.

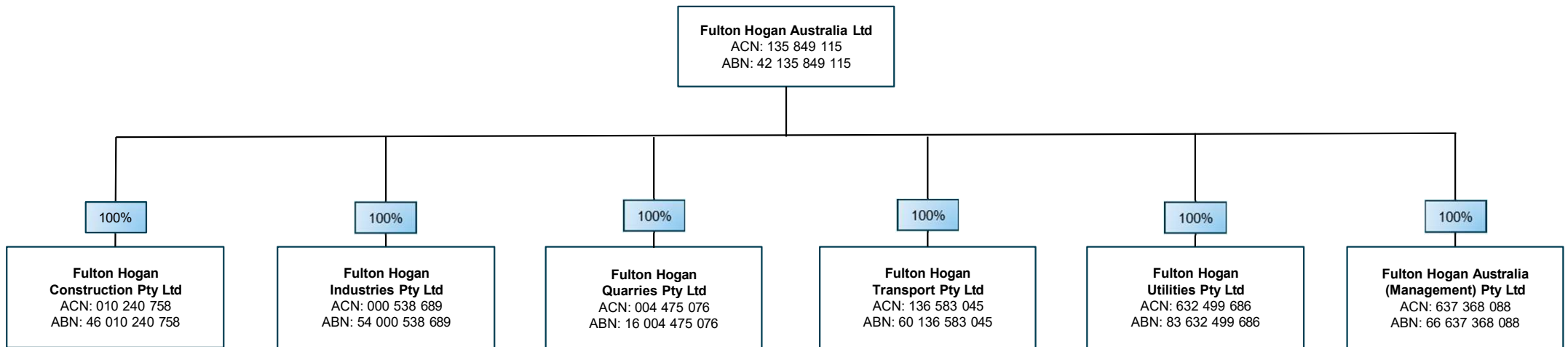
The Fulton Hogan Group is comprised of 32 controlled entities, predominantly in Australia and New Zealand. The ultimate parent entity in the Fulton Hogan Group is Fulton Hogan Ltd. FHA is the holding company of 10 of Fulton Hogan's Australian based controlled entities.

This statement covers FHA and each of the entities it controls. FHA is the reporting entity required to issue this statement under the Modern Slavery Act.



# STRUCTURE

A simplified structure of the Fulton Hogan entities covered by this statement is as follows



# OUR OPERATIONS

Utilities | Infrastructure Services | Construction



# OUR SUPPLY CHAIN

In the reporting period, FHA spent approximately AUD \$2.61B across approximately 10,200 suppliers and subcontractors.

FHA's supply chain is complex, having regard for the diverse nature of FHA's operations. A summary of FHA's key supply chain is set out adjacent.

In the reporting period, the majority of our supply chain was based in Australia. Only 0.48% of our suppliers were based internationally, representing 0.30% of our spend.



## **Project Supply**

FHA engages various third party subcontractors and suppliers to provide construction related services, products and materials. This also includes machinery and plant hire, as well as traffic management solutions.

## **Labour Hire Logistics**

FHA utilises third party labour hire service providers.

FHA engages third party cartage contractors for asphalt and quarry material and general transport logistics.

## **Professional Services**

FHA retains professional consultants, such as designers and engineers, for project delivery. It also engages various consultants to provide environmental, insurance, legal, financial, information technology and other professional services.

## **Cleaning and Maintenance**

FHA engages third parties for the provision of cleaning and maintenance services including plant and equipment servicing, site maintenance and office cleaning services.

## **Uniform, PPE & Office Supplies**

FHA acquires corporate uniforms, personal protective equipment, office supplies and consumables from third parties.

## **Utilities**

FHA retains various service providers across its business to provide utilities including electricity, gas, water and telecommunications.

## RISKS OF MODERN SLAVERY PRACTICES

FHA prohibits any form of modern slavery within its direct operations. This is achieved by ensuring that:

- All of our direct employees are engaged under individual employment contracts or enterprise bargaining agreements that are in accordance with Fair Work Australia's National Employment Standards. We comply with all applicable employment legislation and industrial awards, and none of our employees are paid less than the minimum wage. We also comply with all superannuation and leave requirements.
- The safety of our employees is paramount, underpinned by our Living Safely Policy which aligns with Australian work, health and safety laws. As part of our continuous improvement and commitment to the health and safety of its people, in 2024 FHA launched a revised Health and Safety Strategy, Living Safely 2.0. During the reporting period, FHA continued this campaign and delivered significant positive changes, which benefit both our employees and industry partners, as well as neighbouring communities
- FHA's Whistleblowing process is available to all of FHA employees, which allows them to make anonymous reports about reportable conduct, including suspected modern slavery practices or unethical behaviour. In 2024 FHA launched its first Sustainability Strategy built on the pillars of Environment, Social and Business. Focus areas under the Business pillar include Ethical Conduct and Materials & Supply Chain, reinforcing integrity, accountability and the identification of Modern Slavery risks as integral to being a success, profitable and enduring business.

The Global Slavery Index categorises Australia as low risk for modern slavery. Given the low risk profile, and the policies and processes adopted by FHA, FHA considers that it is unlikely to have a risk of modern slavery practices in its permanent workforce.

FHA is aware that a greater risk of modern slavery exists in its supply chains, particularly in the lower tiers of supply chains and jurisdictions outside of Australia. This includes third party labour hire providers, as well as migrant workers.

To minimise that risk, FHA is committed to working with subcontractors and suppliers to ensure their practices are aligned with FHA's expectations concerning modern slavery and has in place clear procurement policies described below to assist in identifying risks of modern slavery in its supply chains.

## KEY ACTIONS TO ASSESS AND ADDRESS THE RISK OF MODERN SLAVERY

Our Anti-Modern Slavery Process applies to FHA and each of the entities that it controls. Therefore, our approach to modern slavery within Australia is 'group wide'.

The Anti-Modern Slavery Process incorporates the following as part of its overall strategy to address risks of modern slavery:

**Policies and Framework:** In addition to its Anti-Modern Slavery Process, FHA has a framework in place to support its REAL values, which includes its Code of Conduct Policy, Living Safely Policy and Whistleblower Process. In particular, the Code of Conduct is based on our values, policies, procedures guiding our daily work and demonstrates our commitment to uphold proper and ethical business practices. The Code is accessible on our internal website and all employees are required to be aware of it and comply with it.

**Procurement Processes:** FHA has a coordinated procurement process including policies and procedures surrounding modern slavery practices of those within our supply chain. As part of this process, we undertake due diligence checks and certifications from our supply chain by having them complete a capability questionnaire during onboarding in order to identify the potential for prohibited modern slavery practices. This due diligence check is critical to ensuring compliance with our Anti-Modern Slavery Process. During the last reporting period, FHA updated its capability questionnaire to better align with market experience, with the intent that greater engagement will lead to increased compliance and therefore transparency of supplier modern slavery practices, which is supported by this year's audit results

During this reporting period, FHA continued to explore ways in which it could further develop its processes, and engaged a third party provider specialising in supply chain risk to undertake additional due diligence. As part of this exercise, FHA conducted a materiality assessment which enables it to evaluate and identify areas of material risk relating to modern slavery across its supply chain. The results from this assessment formed the basis for targeted auditing of our supply chain, with a particular focus on suppliers operating in higher-risk sectors.

Looking ahead to the next year, FHA intends to leverage the data generated through this tool to further inform our risk assessment strategies, and focus on those procurement categories most susceptible to modern slavery risks. It also intends to undertake a review of all higher-risk suppliers to ensure its existing due diligence screening measures have been followed.

## KEY ACTIONS TO ASSESS AND ADDRESS THE RISK OF MODERN SLAVERY

**Contractual Obligations:** FHA's suite of procurement and subcontract templates include contractual requirements that their suppliers/subcontractors must take reasonable steps to prevent modern slavery in their business and supply chain and express prohibitions against suppliers/subcontractors engaging in modern slavery practices. They also contain provisions requiring subcontractors to certify that all statutory requirements and wages have been paid, and to comply with our extensive safety regime and standards, again reducing the risk that FHA will contribute to modern slavery practices.

**Labour Hire Providers:** FHA only engage reputable and licensed labour hire service providers.

**Training:** FHA's Code of Conduct Module is an internal training module that includes a section relating to modern slavery, including an overview of the meaning of modern slavery, how to raise concerns and a scenario question. This training is available to all relevant employees.

In addition to the Code of Conduct training, FHA provides an annual modern slavery training module to its commercial teams responsible for procurement. This training, in conjunction with a guidance tool containing commentary around identifying risk, assists those employees in identifying potential signs of modern slavery during procurement and reiterates how to report suspected or actual concerns.

**Reporting framework:** All FHA employees are required to raise concerns in accordance with a specified reporting framework if they believe that any Fulton Hogan employee, contractor, supplier or other external party in its supply chains is involved in any of the prohibited practices. Any such reports are to be investigated. Another method of reporting is available via the Fulton Hogan Whistleblower Process, which provides an anonymous and confidential service to report on such matters.

## KEY ACTIONS TO ASSESS AND ADDRESS THE RISK OF MODERN SLAVERY

**Membership of Key Industry Bodies:** Fulton Hogan has proactively engaged with industry and sustainability networks to learn and help progress positive action to address modern slavery risk. Fulton Hogan is a founding member of the Infrastructure Sustainability Council (ISC) Modern Slavery Coalition for the roads sector, which aims to accelerate the eradication of modern slavery from infrastructure supply chains. Since 2019, we have been actively engaged with ISC and other members from the road industry to collaborate on addressing modern slavery risks in the industry.

FHA has also engaged with Social Traders regarding its newly introduced Anti-Modern Slavery support services, providing specialist feedback and outlining corporate requirements to assist in shaping their strategy and the development of future service offerings.

**Continuous improvement:** FHA is committed to continually improving its approach to modern slavery. Employees are encouraged to provide feedback on FHA's Anti-Modern Slavery Process and recommend improvements on a continuing basis. The Anti-Modern Slavery Process is also subject to a formal review at least once every twelve months.

In this reporting period, FHA has taken various steps to improve its processes as outlined above. A range of additional actions have also commenced, or are planned, and will be reported in subsequent statements, including the integrating the data generated as part of its third party materiality assessment into its existing procurement processes.

## HOW WE MEASURE EFFECTIVENESS



FHA's primary methods of measuring the effectiveness of its Anti-Modern Slavery Process are as follows:

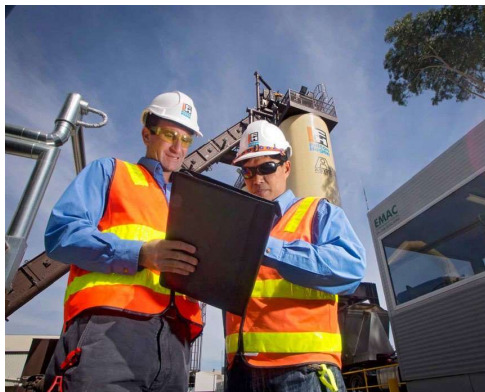
- undertaking an analysis of employees who had completed FHA'S Code of Conduct Module (which indicated 74% of salaried employees had completed as at the end of the reporting period) which includes a Modern Slavery awareness module;
- conducting an internal audit to assess compliance with our Anti-Modern Slavery Process, specifically key control measures in place to facilitate adherence to obligations set out in the Modern Slavery Act;
- our Whistleblower Process, which represents our main grievance mechanism and key method of measuring the effectiveness of our current processes. There were no instances of modern slavery identified in the reports made under its Whistleblower Process.

We will continue to adopt these steps moving forward.

## LOOKING FORWARD

This year's audit was designed to focus on supply chains identified by our third-party provider as being at heightened risk of modern slavery. In the next reporting period, Fulton Hogan intends to utilise the data gathered through its additional due diligence activities to further inform our risk assessment strategies, specifically targeting procurement categories most vulnerable to modern slavery risks. We also intend to conduct a thorough review of all high-risk suppliers to ensure our current due diligence screening procedures have been properly implemented.

One of the findings of this year's audit was that those parts of the business that use digital tools to manage procurement workflow and approval processes were generally better positioned to demonstrate compliance to Fulton Hogan's anti modern slavery requirements compared to those relying on manual systems and processes. Fulton Hogan will continue to investigate its subcontractor management systems with a view to streamlining documentation and adopt digital solutions to strengthen our existing framework.



## CONSULTATION & APPROVAL

The aims of the Anti-Modern Slavery Process include providing clear and uniform guidance across FHA and the entities that we own or control.

In preparing this statement as the reporting entity, FHA consulted with the entities that it owns or controls. In particular, a copy of this statement was provided to the following internal stakeholders to confirm its accuracy:

- the procurement team responsible for implementing the processes and systems the contained in the Anti-Modern Slavery Process;
- the Australian legal and risk and assurance teams;
- the Group CEO, as well as the CEOs of the key operating entities, namely Fulton Hogan Construction Pty Ltd, Fulton Hogan Industries Pty Ltd and Fulton Hogan Utilities Pty Ltd.

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) and has been approved by the Board of Fulton Hogan Australia Pty Ltd.



Graeme Johnson

Group Chief Executive Officer