



MODERN SLAVERY POLICY

Our Structure

Since founded in 1928, McCorkell Constructions Pty Ltd takes seriously its position of influence as one of metropolitan Melbourne and regional Victoria's prominent Building Companies.

McCorkell Constructions Pty Ltd (Collectively, "the company", "us", "our", "we") has created a culture which is evident in the way we behave, and honour our commitments and collaborate with all Stakeholders - Clients, Consultants, Subcontractors, Suppliers and staff.

Our structure is supported by our Directors, who are backed by a highly acclaimed executive team that includes a CFO, Project Construction Managers, and an HSEQ Manager, as well as a comprehensive integrated management system that legally mandates employment entitlements and awards throughout the entire business.

In an industry where change is common, McCorkell Constructions Pty Ltd values the opportunity and responsibility to create a balance of social, environmental, and economic conditions that contribute to the protection of human rights and ethical migrant labour of those in our supply chains and the communities in which we operate.

We are committed to working with our suppliers and the extended supply chain to identify and address risk-adverse modern slavery practices.

Operations and Supply Chains

Our Modern Slavery Statement (Statement) is made pursuant to section 13 of the Modern Slavery Act 2018 (Cth) (Act) and constitutes our Anti-Slavery and Human Trafficking Policy. This statement, approved by the McCorkell Directors, will be reviewed and updated on an annual basis.

McCorkell Constructions has a long history of progressive commitment to improving people's rights and well-being across our operations, made possible by existing internal systems, our degree of ambition, and an emphasis on supply chain transparency.

McCorkell Constructions is a private construction company, which was founded in 1928. McCorkell Constructions specialises in providing multifaceted project delivery services in the building industry.

Affiliations

McCorkell is a member of the following organisations:

- Master Builders Association of Victoria - Member No.714

Accreditations

McCorkell is code-compliant for the construction industry and is accredited under AS/NZS ISO 45001:2008 - OHS, ISO 14001:2015 - Environmental and ISO 9001:2015 - Quality Management.

McCorkell Constructions accreditation requires the business to comply with its modern slavery obligations under the Act.



Supply Chains

McCorkell's supply chains include:

- Construction contractors associated with its construction sites.
- Services that contribute to its operations, such as the cleaning, maintenance and security companies that service McCorkell Construction's Pty Ltd office and sites.

McCorkell's direct supply chains are based in Australia, however McCorkell acknowledges that some suppliers also source key parts and labour from other world regions.

Modern Slavery Risks

McCorkell Constructions recognises modern slavery as a criminal offence involving civil liberties deprivation, human trafficking, forced marriage, and child labour. The risks of modern slavery do not extend to illegal actions (such as wage underpayment) that do not otherwise contain aspects of slavery, compulsion, servitude, or debt bondage, etc. However, reporting on modern slavery risks may have an influence on other surrounding requirements, particularly in terms of labour and immigration compliance.

This Statement sets out the steps McCorkell has taken during the calendar year ended 31 December 2023, to identify and address modern slavery within our operations and supply chains. Moreover, McCorkell has found no reported instances of modern slavery breaches in our business or supply chain within the past financial year. We acknowledge the risks of modern slavery practices in our operations, supply chain and entities owned or controlled by McCorkell.

Actions taken to address Modern Slavery Risks - Training and awareness

An online training module on human rights and modern slavery will be issued to McCorkell's employees including senior management. The training is to be rolled out via the internal system "SharePoint". The module is based off the "Supply Chain Sustainability Modern Slavery (intermediate) e-learning module".

Training covers:

- What is modern slavery
- The types of modern slavery
- How modern slavery can infiltrate our supply chains
- Identifying risks
- Australian legislation and our reporting requirements.

Employees are required to confirm their knowledge through a quiz. McCorkell will monitor the completion of the training via SharePoint and reminder emails are sent to those who have not completed the quiz. All new employees will be assigned this training module as part of the onboarding and induction program.

Corporate social responsibility engagement

There is also a risk of causing or contributing to modern slavery through the engagement of recruitment agencies, subcontractors and labour hire companies. McCorkell Constructions is aware of these potential risks and the need to monitor and address these in an appropriate manner. Such risks include:

- Labour rights, including forced or compulsory labour, wages and benefits, work hours and child labour (including unskilled, temporary or seasonal labour); and
- Health and safety (for workers that McCorkell Constructions do not control (or who are otherwise engaged in operations outside of McCorkell Pty Ltd control).



Due Diligence Exercise and Remediation Processes

McCorkell continues to acknowledge the importance of having efficient modern slavery remediation protocols in place to respond to the identification of cases of modern slavery in a way that does not endanger the safety of victims. McCorkell recognises the need of having a trusted, confidential grievance procedure (and ensuring that our suppliers have one as well) to alleviate and address worker concerns, as well as to serve as an early warning system for modern slavery dangers. As a result, McCorkell has incorporated due diligence, grievance, and remedy procedures into our governance and frameworks.

Whistleblower Protection - Every McCorkell employee and supplier has access to our policies, which they can utilise to report suspected instances of modern slavery, in any form, in our own business and operations or any of our supply chains, without fear of repercussions or reprisal.

Assessing Effectiveness

An annual assessment will take place to review the action planning undertaken by McCorkell to identify, monitor and evaluate the effectiveness of our systems and controls in place to mitigate the risk or potential risk of modern slavery.

McCorkell will assess our subcontracts and purchase orders and ensure our supply chain has similar policies in place where possible. We confirm that this financial year that there have been no modern slavery breaches, or we are not aware of any instances of modern slavery breaches.

McCorkell does not tolerate any behaviours that is in breach of the modern slavery law, and our employees, subcontractors and suppliers operate in line with our standards.

Process for Remediation

During the next financial and calendar year, McCorkell will have internal resources to develop and implement a remediation process with McCorkell's People and Culture Manager.

This statement was approved by the Directors McCorkell Constructions 20 December 2023.



Dale Lyons
Construction Director