

Modern Slavery Statement

FOR THE FINANCIAL YEAR ENDING 30 JUNE 2020



This Modern Slavery Statement covers McNab and all related parties and subsidiaries for the financial year ending 30 June 2020.

Here we outline the standards, policies & processes that contribute to our control framework to proactively protect against modern slavery and respect human rights.

We explain how we will assess and mitigate modern slavery risks, track our performance, collaborate with stakeholders and build capacity around these issues.

NB. McNab operates as one unified business comprised of the following entities:

- McNab Developments (QLD) Pty Ltd
- McNab Employee Holdings Pty Ltd
- McNab Equipment Hire Pty Ltd
- McNab Constructions Pty Ltd
- McNab Enterprises Pty Ltd
- McNab NQ Pty Ltd

THE McNAB VALUES

Safety First
We plan ahead.
We never walk past a single safety issue.

Care
We genuinely care about our people, clients and subbies.
We build relationships based on respect for ourselves and others.

Passion
We love what we do and have fun doing it. We're curious and nimble.

Growth
We don't do comfort zones.
We really listen and rely on feedback.

Response-able
Working together, we make the impossible possible.
We own our mistakes and our successes.

our approach

This statement describes our actions to strengthen McNab policies and performance in accordance with the Australian Modern Slavery Act 2018.

It outlines our continued efforts to work collaboratively with stakeholders in detecting risks of modern slavery in our business and supply chain and ensuring we have appropriate responses in place.

This is McNab's first statement and as such our actions are focused on developing awareness, better understanding our supply chain and associated risks, as well as developing and implementing effective systems to gather information on, review and manage these risks.

our pledge

McNab conducts all business activities with honesty, integrity and highest ethical standard at all times.

We have a zero tolerance approach to modern slavery and any action or inaction that contributes to the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are fully committed to identifying and preventing all types of modern slavery, being human trafficking, slavery and slavery practices, child labour, unsafe and unlawful work and employment conditions, throughout our operations, subcontractors and supply chain.

We will implement effective systems and controls to continually challenge our ability to combat modern slavery within our business and across our supply chain.

Michael McNab
Managing Director

our business

Since we began in 1996, McNab has grown to become one of the largest private construction companies in Queensland, working on projects up to \$120m in value with an annual turnover over \$400m.

With more than 300 staff based across South East Queensland and a supply chain spanning Australia and overseas, we've built a reputation for delivering high quality, award winning developments for some of the best brands in Australia.

McNab operates as the head contractor in commercial construction, design and engineering projects. As such we engage a large subcontractor workforce and work with a vast number of manufacturers and suppliers of natural resources and raw materials.

These relationships are direct – through our own local sourcing and overseas procurement, and indirect – with our subcontractors sourcing their own supplies and materials.

Our direct workforce is 330 company employees; predominantly operational roles, Project Managers and Engineers, Site Managers and Foreman, Contract Administrators, Carpenters, General Labourers, Apprentices and Cadets.

Our operating employment framework complies with all local laws and covers core employment conditions including but not limited to minimum wages, hours of work and leave entitlements.

We always act in accordance with the principles of our contract agreements, the Australian Fair Work Act 2009 and our redundancy, redeployment, diversity and inclusion policies.

our actions this year

We have established this, our first, modern slavery statement and will revisit annually to ensure compliance with legislation and that we are upholding the highest standards of honesty, integrity and ethics in all our business operations.

We are working closely with key stakeholders to identify and better understand the risks of modern slavery in our operations and across our supply chain.

We have, and continue to, conduct due diligence with our suppliers and subcontractors to identify any potential risks of modern slavery in our operations and/or supply chain.

We are educating our employees, direct suppliers and subcontractors to develop their awareness of modern slavery, and ensure they understand how to identify any associated risks and implement management initiatives.

We are constantly assessing our approach to identify any gaps in knowledge and find opportunities to monitor and respond to risk.

We are implementing systems to gather and review information regarding modern slavery risks in our supply chain, assessing current controls and implementing additional control requirements.

Having started the conversation with our stakeholders to build awareness and understanding, we have developed some early initiatives to combat modern slavery across the business.

We have found that previous business strategies such as regularly visiting overseas suppliers and manufacturers are highly effective, however, due to the restrictions caused by COVID-19, new strategies need to be considered to ensure we have full visibility of our offshore supply chain.

our supply chain

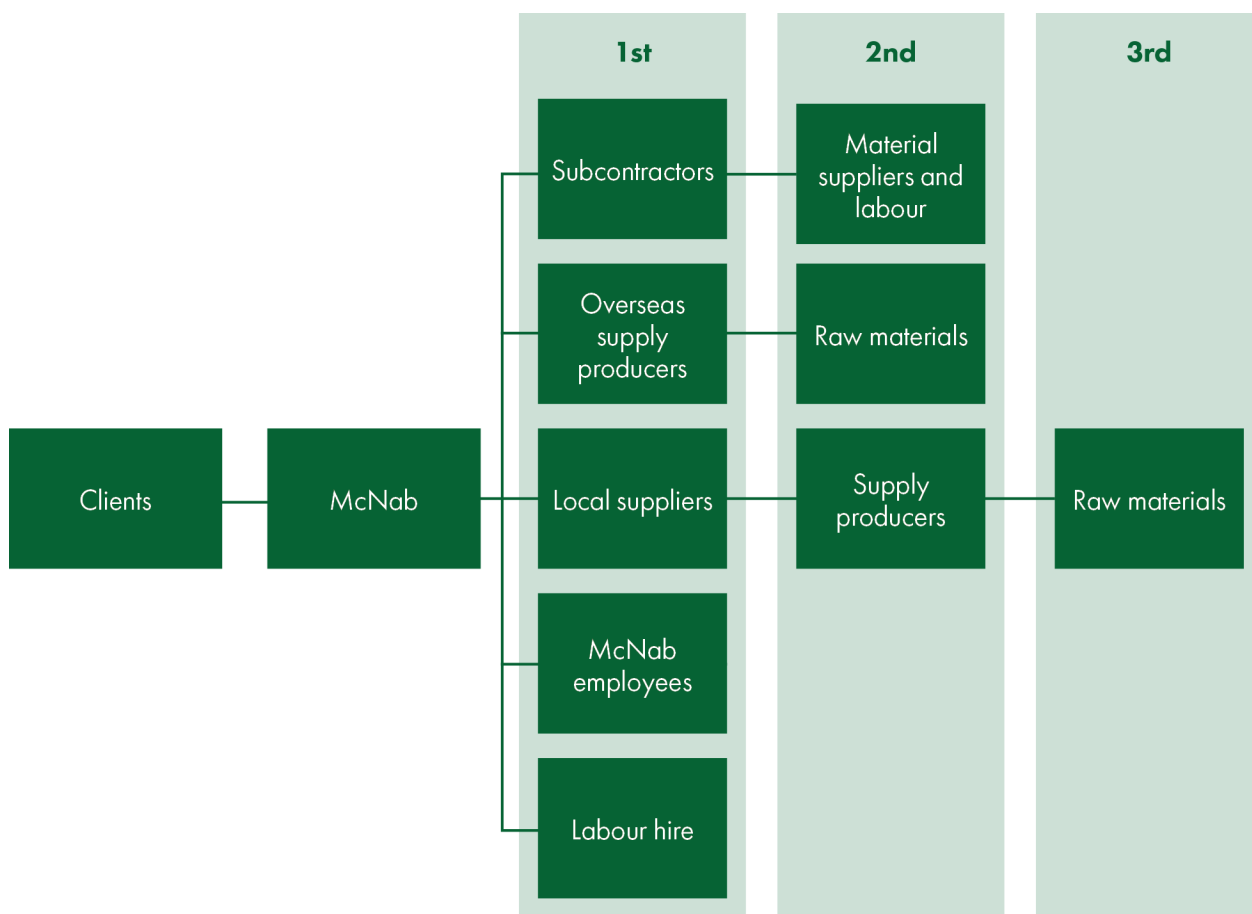
McNab is a people business as much as we are a construction business. Our values are behind everything we do and they're shared by everyone across the business and all those who are part of our supply chain.

All supplier, subcontractor and consultant selection includes due diligence of each party's reputation and respect for the law.

We take into consideration the location of our supply chain partners, the original supply location and the type of goods and services.

Our selection process includes but is not limited to:

- Compliance with government mandated standards
- Compliance with health and safety standards
- Compliance with government mandated standards
- Compliance with health and safety requirements
- Compliance with environmental requirements
- Industry references



risks, controls & evaluation

As a construction business with a supply chain operating locally and overseas, we are focusing on the following areas to ensure compliance with legislation and that we have clear risk assessment and effective controls in place:

- Engaging visa workers, using a labour hire workforce and the recruitment practices of subcontractors,
- Employee rights and working conditions of overseas suppliers, supply producers, and raw material producers,
- Material supplies and sourcing supplies from overseas.

Our controls will include relevant policies, guidance, education and training, with specific due diligence activities for members of our supply chain to include:

- Conducting surveys during initial letting to identify relevant risk areas,
- Gathering additional survey data during award to further understand their management practices, and
- A statutory declaration confirming compliance, as well as agreeing to inspections of facilities, materials and working conditions.

Grievance and remediation measures to support our modern slavery statement include:

- Whistleblower and grievance policies and procedures,
- Third party investigations where required, and
- Training and education.

our focus next year

In response to COVID-19 restrictions, we will implement revised strategies to effectively manage our overseas procurement due diligence and management process.

We will develop a deeper understanding of our supply chain and further educate and support our suppliers and subcontractors.

We will gather data to first identify, then understand any risks associated with modern slavery within the business and develop appropriate controls across our supply chain.

To ensure that all members of our supply chain comply with our values and zero tolerance policy on modern slavery, we are building a framework of measures to assess and monitor our suppliers' conduct.

our performance

We will continually measure the effectiveness of our risk assessment and controls by undertaking regular reviews and defining subsequent actions.

The McNab Management Group will review this modern slavery statement and our overall strategy annually, and conduct a biannual review of all data and activity, implementing further actions as and when required.

This statement was approved by Michael McNab as the Sole Director of the McNab group of entities.

Michael McNab
Sole Director
31 March 2021