



MODERN SLAVERY STATEMENT

For the Year Ended June 30, 2025

REPORTING ENTITY:

A W Nicholson Pty Ltd

ACN: 118 404 381

Trading as Nicholson Construction (AWN)

Commercial in Confidence

www.awnicholson.com.au

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Cover image: Biyal-a Armstrong Creek Town Centre Library
Built by Nicholson Construction

EXECUTIVE SUMMARY

Under the Modern Slavery Act (2018) (*the Act*), Nicholson Construction (AWN) is required to submit information to the Australian Border Force detailing the steps we have taken to comply with *the Act*. AWN has developed and implemented policies and procedures to address our obligations which includes a process of identifying the risks associated with modern slavery, and strategies to address them.



Figure 1: Mansfield PSRACS Aged Care

Over the years our processes have matured, and we continue to educate our suppliers and subcontractors on *the Act* itself and our mutual obligations and requirements under *the Act*.

Upon review of our Modern Slavery Risk Assessment and our Modern Slavery Charter in 2025, we found that:

- Modern Slavery was adequately addressed in Company Policies (Modern Slavery Procedure (500-P002) and Modern Slavery Charter (500-F022))
- Our risk assessment adequately determines the risks and exposure our operations have to Modern Slavery (500-R006)

- Our procedure ensures that all subcontractors and suppliers classified as high-risk and above complete our Modern Slavery Charter (500-F022) supplier questionnaire to enable a more accurate assessment of their risk and exposure to modern slavery issues.
- Internal procedures dictate that all suppliers with an annual spend >\$1million per annum are initially classified as medium or high-risk based on the nature of their works and our knowledge of their supply chain until they have undergone a review to re-assess their exposure. Our Modern Slavery Charter supplier questionnaire was issued to all suppliers with a medium and high-risk classification, and their risk classification re-assessed on receipt.
- We updated our procurement processes in 2025 enhancing the promotion of Modern Slavery obligations within our pre-award documentation, raising questions and establishing expectations prior to awarding any suppliers.

We researched modern slavery through various sources including the Global Slavery Index and after conducting a detailed Risk Assessment (500-R006) of our entire supplier database, including engagement with our medium and high-risk suppliers, identified the following outcomes:

- no suppliers were deemed high-risk in the FY25 assessment.
- the maturation of our (and our suppliers') Modern Slavery assessment process has identified 40 suppliers as medium risk in the FY25 assessment. We maintain a watch and review process with those suppliers classified as medium risk, and re-assess their exposure annually.

After analysing and assessing the validity of our review, we are satisfied the risk of engaging in modern slavery to procure labour and/or supply our manufactured goods is low.

We will continue to implement procurement procedures to ensure our obligations under *the Act* are fulfilled.



Richard Nicholson

Director

COMPANY STRUCTURE, OPERATIONS, AND SUPPLY CHAINS

A W Nicholson Pty Ltd, trading as Nicholson Construction (AWN), is a long-established family business which commenced operation in the late 1800s and has grown to become a leading commercial construction company in regional Victoria. We specialise in buildings up to \$50M serviced from our offices in Ballarat, Bendigo, Geelong, and Warrnambool.

We specialise in commercial construction of healthcare, education and government public facilities, as well as private projects such as retail, hospitality and industrial projects.

We have a professional team of personnel and utilise numerous subcontractors and suppliers, most of whom are based in regional Victoria. Our business operations are limited to Victoria only.

Our suppliers include small, medium, and large enterprises (SMEs) depending on the materials and/ or services being procured. Typically, our construction projects achieve local content targets in excess of 90% (where local content is defined by the Industry Capability Network (ICN) as Australian and New Zealand origin). Given the high local content regularly verified by ICN, our exposure to modern slavery is low, but this doesn't warrant complacency with regard to the risks.

As a company we are proud of the contribution we make to the communities in which we operate. We have a commitment to excellence and a charter that documents our approach to ethical and professional standards of behaviour and performance.

Our management systems are accredited to ISO9001:2015, ISO45001:2018, ISO14001:2015 and Federal Safety Commission standards.

RISKS OF MODERN SLAVERY PRACTICES

Since 2021, Nicholson Construction has conducted an annual review of our Modern Slavery Risk Assessment for our entire supply chain inclusive of over 2,500 subcontractors and suppliers.

To assess the risk of modern slavery within our supply chains, consideration is given to:

- the source of their products (whether they were manufactured locally or imported)
- the level of expertise/ skill of the workforce required to manufacture and install the product
- their potential supply chains, and the total spend Nicholson Construction had with the supplier and/ or subcontractor.

A particular focus was made on those products (and therefore the supplier) that could be imported from countries identified as high-risk by the *Global Slavery Index* (<https://www.globalslaveryindex.org>)

Further, the risk assessment considered suppliers who may fail to pay wage rates in accordance with state and federal Awards and employment conditions including the *Victorian Federal Awards (Uniform Systems) Act 2003* and the *Australian Industrial Relations Act 1988*.

In summary, our risk assessment focused on the following attributes for every supplier:

- Quantity of our annual spend (\$ value)
- Category of our spend – Identified if the supplier provides goods or services, or both
- Understanding our risk – Identified the goods being supplied and determined the risk of being sourced from countries that have a high-risk of modern slavery practices
- Digging deeper with medium and high-risk suppliers – the suppliers who were identified as high-risk were subject to further exploration and review as to the source/manufacture of their products. Further, all suppliers (whether they were medium or high-risk) with an annual spend >\$1m per annum, were issued with our Modern Slavery Charter questionnaire in order to interrogate their processes and exposure.

This resulted in the questionnaire going out to 58 entities on 24th November 2025.

CONCLUSION OF THE 2024-2025 ASSESSMENT:

- the majority of our suppliers and subcontractors were assessed as low-risk of modern slavery practices
- two suppliers initially assessed as medium risk supplied their own Modern Slavery statement as part of their response to our questionnaire. Upon review of their statements they were reassessed as low risk.
- Other suppliers were re-classified following our questionnaire, one from high to medium and one from medium to low.
- Mechanical suppliers and mech supply chain generally was a new focus for this year’s statement. Initially the eight mechanical suppliers were marked as medium risk due to the overseas procurement of specialist equipment. All were re-rated medium or low risk following questionnaire responses and phone conversations as we better understand the processes they have in place to manage Modern Slavery risks related to overseas procurement.
- 40 suppliers were deemed medium risk in the 2024-2025 assessment.
- no suppliers were deemed high-risk in the 2024-2025 assessment.

<i>Live - Final</i>		<i>Initial</i>	Change
Low	92	84	8
Med	40	38	2
High	0	10	-10
	132	132	

Figure 2: Post-2025 survey risk ratings



Figure 3: Biyal-a Armstrong Creek Library – Project Delivery Team

Another proactive measure that we put in place this year was addressing Modern Slavery Charter questions to our standard pre-award interview form template. This resulted in every subcontractor and major supplier providing responses to AWN each time they were engaged on one of our projects.

ACTIONS TAKEN TO ASSESS AND ADDRESS THESE RISKS

NICHOLSON CONSTRUCTION MODERN SLAVERY CHARTER (500-F022) QUESTIONNAIRE.

Our Modern Slavery Procedure requires all subcontractors and/ or suppliers with a profile deemed high-risk to complete the Nicholson Construction Modern Slavery Charter (500-F022) questionnaire. In 2025 we extended our engagement to include all suppliers with an annual spend >\$1m per annum which included suppliers with initial classifications of medium and high-risk.

This questionnaire seeks to clarify the source of the supplier's products and the procedures they have in place to address risks of modern slavery, and the supplier's maturity with regards to their knowledge of *the Act* and any procedures they might have in place to manage modern slavery risks

Upon receiving the completed questionnaire, we analyse the response and validity of the results and re-assess the risk of modern slavery based on their information. Their initial risk classification within our RA (500-R006) is then re-classified. This year we were pleased to see a number of our suppliers returned their own Modern Slavery statements (rather than ours) indicating their growth and maturity with regards to *the Act*, and providing us greater confidence for our risk assessment classifications.

We continue to work with each supplier until such time as their risk assessment rating is reduced to medium or low and maintain dialogue on an ongoing basis to obtain sufficient knowledge and information about their supply practices to satisfy ourselves of our compliance with *the Act*.

VIA PROCUREMENT PROCESSES

As a proactive measure this year we added modern slavery charter questions to our standard pre-award interview template which results in every subcontractor and supplier (regardless of their risk classification) providing responses to AWN with regard to our expectations and their obligations under *the Act*.

Our procedures require the Charter to be returned amongst a suite of documents as pre-requisite for payment.

We also have integrated processes to address Sham Contracting as defined by the Fair Work Act. These processes have been incorporated within our procurement process for all subcontractors and are undertaken prior to the subcontractor commencing works onsite to ensure workers are paid in accordance with minimum Award requirements and specific employment conditions.

VIA SITE MANAGEMENT SYSTEM (HAMMERTECH)

Trades who we see as often using migrant workers were classified as medium risk. In addition to the modern slavery charter questionnaire assessment process, we have implemented a HammerTech™ hold point process to manage risk around the necessary working VISAs and this is proving effective since implementation in 2024.

These suppliers could be re-classified as low risk with this hold point process in place however we leave them as "medium" as a further prompt to continue to monitor them and maintain our processes.



Figure 4: Nicholson Construction staff and subcontractors onsite at the Camperdown RACD Aged Care project.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

The *Nicholson Construction Modern Slavery Charter* is the main tool to prevent, mitigate or remedy modern slavery issues. Supporting our desktop risk assessment process is the integration of modern slavery duties and obligations within our procurement procedures and supplier contracts, together with hold points onsite where checks are completed to ensure employment engagement practices are legitimate.

The Charter and its contents are reviewed as part of our Modern Slavery Risk Assessment. Our Charter was reviewed giving consideration to the responses from subcontractors who were profiled as high and/or medium risk in previous years. The review determined that the current Charter was adequate and that no further action is required within the Modern Slavery Charter or Procedures.

We are confident that our risk of non-compliance with *the Act* is low. We will continue to implement our Modern Slavery procedures and review our Modern Slavery Risk Assessment (500-R006) again in 2026.

CONSULTATION WITH ANY ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS

Consultation of this manner is not applicable to Nicholson Construction.

OTHER RELEVANT INFORMATION

Nicholson Construction remains proactive in promoting the obligations imposed on our company and commits to ongoing assessment of our supply chain in relation to Modern Slavery and supporting our suppliers and subcontractors in our endeavour to avoid all forms of modern slavery.

STATEMENT

The Nicholson Construction Modern Slavery Statement was approved by the company board of directors on 12 December 2025.



Richard Nicholson
Director