Stephen Edwards CONSTRUCTIONS

MODERN SLAVERY STATEMENT

FINANCIAL YEAR 2024 / 2025

REVISION: A

ISSUE: JULY

2025

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Company Details

Stephen Edwards Constructions Pty Ltd (SEC) is the Modern Slavery reporting entity. Company details:

- ACN: 001 824 139
- ABN: 65 001 824 139
- Incorporation date: 1979
- Head Office: 140 Wicks Rd, Macquarie Park NSW
- Contact Details:
    - Ph: 02 9891 3099
    - Email: primary@stephenedwards.com.au
    - Website: www.stephenedwards.com.au
    - Modern Slavery Representative: Tom Glynn, Systems & Compliance Manager

Management Statement

Modern slavery is a global phenomenon which includes a range of activities that seriously deprive individual liberty and freedoms. These activities extend beyond mere unfair labour practices and unfair pay, as slavery violates fundamental human rights through coercion, threats, deception and physical control.

Modern slavery practices present a threat to fundamental human rights such as the right to dignity of human person and personal liberty.

SEC is committed to complying with the *Modern Slavery Act 2018 (Cth) & the Modern Slavery Act 2018 (NSW)*.

We are committed to ethical business practices that will contribute to the stamping out of modern slavery in all its forms by implementing a zero-tolerance system towards modern slavery through our supply chains.

SEC's direct suppliers and subcontractors are usually based locally, with the remainder normally still being Australian operated businesses. As such, SEC's exposure to risk within our supply chain is regarded as minimal.

At SEC, we have made clear to our Employees, Subcontractors and Suppliers what the company's expectations and commitment are towards eliminating modern slavery in our operations and supply chain.

This statement has been prepared on behalf of SEC in accordance with the *Modern Slavery Act 2018 (Cth) & the Modern Slavery Act 2018 (NSW)*.

This Modern Slavery Statement has been approved by the Directors of Stephen Edwards Constructions Pty Ltd.

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Structure, Operations & Supply Chains

Structure

SEC is an Australian, privately owned, family business. It is owned exclusively by our four company Directors without any parent or shell company, therefore a 'single reporting entity'.

Operations

SEC is an established Australian building company specialising in the construction of education, health, commercial, infrastructure, aged care and government projects. We complete a range of commercial construction projects across Metropolitan Sydney & regional New South Wales. Since the company's incorporation in 1979, SEC has completed over 600 construction projects. SEC employs approximately 130 staff.

The company's operations include:

- Construction
- Design management
- Cost planning

SEC typically perform the role of Principal Contractor on construction projects and employ staff in the roles of management, supervision, administration, and finance. We do directly employ a small number of trade workers who undertake ad-hoc construction tasks of a minor nature.

Supply Chains

SEC pride ourselves on long term sustainable relationships with both our clients and our suppliers. Our supplier base for labour and materials consists largely of Australian owned SME businesses who are also located in the Sydney Metropolitan area.
The procurement and engagement of subcontractors and suppliers is dependent on individual project requirements and can loosely be categorized as ;

TIER 1

- Australian owned businesses who provide raw materials and fabricated construction components
- Australian owned businesses who provide skilled manual labour for installation of building materials
- Australian owned businesses who provide electricity, telecommunications, and utilities
- A combination of Australian and foreign owned businesses who provide SAAS and data storage

TIER 2

- Australian owned businesses who provide logistics for the transport of goods and materials
- A combination of Australian and foreign owned businesses who supply plant and equipment such as tools and machinery
- A combination of Australian and foreign owned businesses who provide raw materials such as paper, wood, fuel, steel, plastics, and aluminium.

Products are often specified by our clients and their independent designers, which means that the selection of raw materials & suppliers which make up our supply chain are outside the control of SEC.

Suppliers provide products based on project requirements. We promote the supply of Australian products from Australian suppliers where possible.

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Assessment of Risk of Modern Slavery Practices

SEC have undertaken a risk assessment in 2025 by a third party to assist in the identification of modern slavery risks through our works, policies, and procedures. We have also undertaken internal audit and risk assessment of the most commonly used products and services within our supply chain. A summary of these findings is tabled below ;

TYPE OF MODERN SLAVERY RISK	RISK RATING
Direct Employment of SEC workforce There is no risk of Modern Slavery occurring in our direct operations. All workers are paid at or above Industry Awards, and there is no withholding of visas, forced labour, or underage workers. We undertake regular financial audits which would verify these practices.	Nil
Tier 1 supply chain • Workers directly contributing to our projects, but employed by subcontractors – our sites are all located in Australia, with verifiable consultation practices, and employee self-reporting to confirm workers are paid at or above Industry Awards. • Suppliers of software products and data storage – most providers are larger, reputable companies who are reporting entities in their own right with low risk profiles. • Suppliers of energy, office supplies, plant and machinery – most providers are larger, reputable companies who are reporting entities in their own right with low risk profiles.	Very Low
Tier 2 supply chain • Retail of construction materials either in raw or processed form – most providers are larger, reputable companies who are reporting entities in their own right. • Logistics companies used in the supply and transport of goods and materials - most providers are larger, reputable companies who are reporting entities in their own right.	Very Low
Tier 3 supply chain • Mining & Fabrication of construction materials and fuels – some providers are off-shore, and include international freight. Most providers remain as larger, reputable companies linked to Australian incorporated companies who are reporting entities in their own right.	Medium

Based on our risk assessment, we believe that the highest risk is within our supply chains is where imported goods, particularly those from South-East Asia, may engage workers exposed to modern slavery practices. This is also the most difficult risk to control and manage. SEC are aware of risks that exist with these supply chains and will continue to evaluate alternative suppliers based on their risk profile and active pursuits to reduce or eliminate Modern Slavery.

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Actions taken to address Modern Slavery Risks

We implement the following actions to address the risk of modern slavery;

Direct Employees

All direct employees are employed on an individual basis in accordance with Australian Laws. This removes any risk of Modern Slavery in our direct workforce.
Where SEC directly employ any person who is not an Australian Citizen, we monitor the scope and currency of visas to ensure compliance, and do not keep hold of physical copies of visas, passports, or any other document pertaining to ability to freely leave.

SEC implement an a variety of corporate policies that support and strengthen our efforts toward elimination of Modern Slavery within our Supply Chain, including ;

- Modern Slavery Policy
- Whistleblower Policy
- Corporate Social Responsibility Policy
- Workplace Bullying and Harassment Policy
- Industrial Relations Policy
- Workplace Bullying and Harassment Policy
- Equal Opportunity Policy
- Fraud and Corruption Policy
- Dispute Resolution Policy
- These policies are attached to this document.

Subcontractors' employees and supply chains

- Modern Slavery requirements discussed during Subcontract procurement
- Modern Slavery Provisions are included with Subcontracts
- Statements of compliance are required for payment to ensure that any directly employed workers of our subcontractors are legally paid for their works.

SEC Promote the engagement of the following types of subcontractors/suppliers:

- Local businesses with known workforces
- Use known subcontractors with proven record of compliance
- Preference for majority direct workforce rather than labour hire workers
- Any identified breaches of Modern Slavery compliance are recorded in formalised process that notifies all other staff involved in the procurement process – including historical breaches.

Supply chain for products used on our projects

- Modern Slavery Provisions are included with Purchase Orders
- Promote the use of Australian products where possible
- Promote the use of 'established' companies where overseas products must be used where companies have Modern Slavery compliance systems in place.
- Reviews conducted on our suppliers include informing other staff involved in the procurement processes of the business of any breaches or areas of high risk, along with promotion of low risk alternatives to current suppliers.

If Modern Slavery practices are suspected to have occurred in our Subcontract workforce or supply chains, the following process will be implemented:

- Suspend the Subcontract / Supply of Materials
- Investigate the activity to confirm if there is Modern Slavery (as defined by legislation) occurring

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- Report Modern Slavery practices to appropriate authorities
- Discontinue to use the offending Subcontractor or Supplier permanently, or if this is not reasonably practicable, suspend the use of the Subcontractor or Supplier until the Modern Slavery event / risk is resolved and sufficient measures are put in place by the organisation to prevent the re-occurrence of Modern Slavery.

Consultation & Training

Consultation with SEC Employees:

- Employees have been trained on what Modern Slavery is and how SEC will address the risks of Modern Slavery. Training Records are kept as confirmation.
- Consultation has been sought as part of this training.
- Annual refresher training will be provided the ensure that staff are kept informed and up to date on Modern Slavery requirements.
- New employees will be trained on how SEC manages Modern Slavery risks and compliance as appropriate.

Consultation with Suppliers & Subcontractors:

- Modern Slavery requirements discussed at subcontract / purchase order award
- SEC has included Modern Slavery compliance requirements in the POST TENDER CHECKLIST form. This form is used to ensure that Modern Slavery is addressed as part of our procurement process in a format that allows 2 way communication between SEC and our supplier.
- Modern Slavery Provisions are included with Subcontracts to form binding agreements

Other training and consultation:

- Tom Glynn, Systems & Compliance Manager, has undertaken training sessions and consultation with external providers who have provided guidance on Modern Slavery and our compliance requirements.
- Mathew Edwards, Director, has attended external workshops on Modern Slavery.
- We have had consultation with some key clients on Modern Slavery and how we achieve compliance e.g. Catholic Education Office and Opal HealthCare.

Assessing the Effectiveness of Modern Slavery Compliance

SEC has nominated Tom Glynn, Systems & Compliance Manager, to hold the responsibility of assessing Modern Slavery Compliance within our company. As part of this role Tom will complete checks, from time to time, on the following processes:

- Assessment on our supply chain to identify the potential of modern slavery, and any alternatives to reduce our risk exposure
- Advise our Directors and Senior Management of the findings from assessments, and any recommendations for ongoing continual improvement
- Review, update, and manage the processes, procedures, and internal training related to Modern Slavery to ensure ongoing compliance with the Act and Industry best practice
- Audit and review the implementation and outputs of our processes & procedures, including that of Modern Slavery provisions

Tom should provide outcomes of compliance checks to the Director(s) for review. If non-compliances are encountered, Tom is to immediately notify the Director(s).

SEC are aware of our reporting requirements to the Modern Slavery Business Engagement Unit within the Australian Border Force (ABF), and the NSW Anti-Slavery Commissioner's Office and will ensure that any breaches are reported as soon as practicable.

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Modern Slavery Policy

The Commonwealth Modern Slavery Act 2018 (the Act) and the Modern Slavery Act 2018 (NSW) recognises that modern slavery is prevalent around the world, and sets out steps to ensure Australia is not contributing to these crimes. Stephen Edwards Constructions (SEC) also recognises that modern slavery is a growing and complex problem and is committed to working in a collaborative approach with all our stakeholders in respecting and promoting human rights and eradicating modern slavery.

Our aims are to ensure that our supply chain achieves the following outcomes:

1. Our Suppliers and Subcontractors shall not use any type of:

- Work or service extracted from any person under the menace of any penalty, which work has not been freely chosen by the person.
- Work which is not for compensation received by the worker, but to repay a debt, which is often incurred by another person offering the worker's labour in exchange.
- Work in which an employer forbids workers from leaving employment at the worker's discretion.
- Child labour.

2. Our Suppliers and Subcontractors must:

- Comply with all laws regulating hiring and employment, working hours, working conditions, wages, overtime compensation and legally mandated benefits.
- Provide a safe and hygienic working environment that is without risk to health, taking into consideration knowledge of the relevant industry and any specific hazards.
- Ensure all workers are employed based on their ability to do the job, not on the basis of personal characteristics, free from harassment and abuse.

To achieve the above aims, SEC will undertake the following:

Understanding SEC's Modern Slavery requirements

SEC will provide staff training to ensure that Modern Slavery requirements are understood including how our systems and forms address Modern Slavery requirements.

- All employees are required to actively participate in company training to understand the implications of this policy.
- Training for new staff will occur during employee company inductions.
- Auditing and further training will be implemented on a periodic basis.

Engagement of Subcontractor or Suppliers

Ensure that the following items are completed as part of our procurement processes:

- Conduct appropriate due diligence to ensure there are no Modern Slavery Practices in their operations or their supply chain
- Include Modern slavery obligations within Subcontract Agreements and Purchase orders and ensure that Subcontractors and Suppliers undertake not to engage in any conduct or activity that involves or may give rise to, encourage or permit Modern Slavery as part of their engagement.
- During the completion of a material supply or subcontract works

During the progress of a Supply Order or Subcontract Agreement

Ensure that Subcontractors or Suppliers comply with the following:

- compliance with the nominated Modern Slavery Requirements in Orders and Subcontract Agreements
- provide to the Supplier all information requested by it in relation to such Modern Slavery Practices
- take all reasonable action requested by the Supplier or otherwise required to identify, assess, remediate and eliminate Modern Slavery Practices in their operations
- promptly notify the Supplier in writing of any Modern Slavery Practices they identify or suspect
- Work with SEC to take all reasonable action requested by the Supplier to address issues.

SEC commitments

SEC will undertake all required action for compliance to State and Commonwealth legislation relating to Modern Slavery, including ;

- Implementation of this policy and related procedures
- Reporting of any known or suspected instances of Modern Slavery
- Commitment of Senior Management to the implementation of our Modern Slavery Policies, Procedures, and Processes
- Publishing of a Modern Slavery Statement in accordance with legislative requirements

We encourage all employees, visitors, or any other workplace participant to come forward with any concerns about Modern Slavery issues. Issues can be privately and confidentially identified by either:

a) Emailing, calling or meeting with a Director in person.

b) Anonymously – use the website to submit a comment via http://www.stephenedwards.com.au/contact

Mathew Edwards
Director

17052025

Whistleblower Policy

Purpose

Stephen Edwards Constructions (SEC) is committed to promoting an ethical culture in which employees, subcontractors and clients are treated fairly. The purpose of this policy is to foster a 'speak up' culture which encourages the reporting of matters of significant wrongdoing and provides protections and measures so that those persons who make a report, do so confidentially and without fear of intimidation, disadvantage or reprisal in accordance with the Corporations Act 2001.

Scope

This policy applies to:

- Employees
- SEC's Suppliers and Subcontractors
- Relatives and Dependants of the above

Reportable Conduct

A whistleblower may make a disclosure under this policy if they have reasonable grounds to believe that a person who has business dealings with SEC has engaged in conduct (Reportable Conduct) which is:

- Illegal (such as theft, dealing in or use of illicit drugs, violence or threatened violence and criminal damage to property)
- A significant or serious threat to the health and safety of workers
- Associated with stealing or offering or accepting a bribe
- Associated with the leaking of confidential information to SEC's competitors, clients or any other person that may misuse this information
- Grossly negligent or unethical
- Misconduct or an improper state of affairs

Any disclosures that do not fall within the definition of Reportable Conduct, will not qualify for protection under the Act. It will be at the Company's discretion whether it considers there is a reasonable suspicion that the Reportable Conduct is occurring and/or whether the conduct constitutes "misconduct or improper state of affairs" under the Act. take reasonable care of their own mental health and wellbeing, including physical health

For the avoidance of doubt, Reportable Conduct does not include personal work-related grievances. Examples of personal work-related grievances are as follows:

- Personal disputes between staff
- A decision relating to the engagement, termination, transfer or promotion of staff

Personal work-related grievances should be reported to a Manager, Division Head or a Director and will be investigated and addressed separately.

Making a Disclosure

SEC encourages the disclosure of Reportable Conduct. Disclosures can be made verbally or in writing and at any time (including outside business hours), to the following people:

- Daniel Edwards (Director) on 0418 650 980 or dewards@stephenedwards.com.au
- Mathew Edwards (Director) on 0425 209 533 or medwards@stephenedwards.com.au
- David Cleary (Construction Manager) on 0425 289 440 or dcleary@stephenedwards.com.au

Disclosures should include as much information as possible, including the details of the misconduct, people involved, dates, locations and any other evidence that exists.

Disclosures can be made anonymously and will still be protected under the Corporations Act. It may be difficult to properly investigate the matters disclosed if a disclosure is submitted anonymously and therefore SEC encourages the discloser to share their identity, however they are not required to do so.

A discloser must not make a false or vexatious claim. Protections under this policy will not be applied to a false disclosure of vexatious claim. SEC may apply disciplinary proceedings in relation to a false disclosure or vexatious claim.

We strongly encourage disclosures to be made to SEC in the first instance, however you may choose to discuss your concerns with a legal practitioner for the purposes of obtaining legal advice or representation and you may also make a disclosure to the Australian Securities and Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA) in relation to a Reportable Conduct and be protected under the Act. A public interest and emergency disclosure can be made to a member of parliament or a qualified journalist and be protected, if the discloser:

- Has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons, or to the natural environment; and
- Has previously made a disclosure to SEC, at least 90 days has passed since making that disclosure and they have reasonable grounds to believe that action is not being taken to address the matter; and
- Has given written notification to SEC that they intend on making a public interest disclosure; and
- Has previously disclosed the information to ASIC or APRA; and
- Has reasonable grounds to believe that making a further disclosure to a journalist or member of parliament would be in the public interest; and
- No more information is disclosed than is reasonably necessary to inform the recipient of the substantial and imminent danger.

Investigating Disclosures

The disclosure will be assessed to determine whether the matter falls under this policy. If the matter does not fall under this policy, the discloser will be notified on how the matter will be handled. If the matter falls under this policy, the discloser will be contacted to discuss the investigation process and any other matters that are relevant to the investigation. Where the discloser has chosen to remain anonymous, the investigation will be based on the information provided within the disclosure. The issues may also be referred to an external Authority if determined necessary by SEC.

The investigation will be conducted as follows:

- As soon as practicable after the disclosure has been made; and
- In an objective and fair manner, ensuring that every individual subject to the investigation is granted sufficient opportunity to reply to allegations before any findings are made

Issues identified within the investigation will be resolved or otherwise finalised. All relevant information will be saved in a secure electronic location and if requested, and to the extent permitted by law, the discloser will be updated during the investigation and informed of the outcome.

Protections for Whistleblowers

SEC is committed to ensuring that any person who makes a disclosure is treated fairly and does not suffer detriment and that confidentiality is preserved in respect of all matters raised under this policy.

All information received from the discloser will be treated confidentially and sensitively. A discloser's identity (or any information which would likely lead to their identity) will only be shared if:

- The discloser gives their consent to share information; or
- The disclosure is allowed or required by law (for example where the concern is raised with SEC's lawyer for the purposes of obtaining legal advice); or
- The concern is reported to ASIC, APRA, ATO or AFP

Where it is necessary to disclose information for the effective investigation of the matter, and this is likely to lead to the disclosers identification, all reasonable steps will be taken to reduce the risk of the discloser being identified. SEC will also take the following measures for protecting identity:

- All paper and electronic documents and other materials relating to disclosed will be stored securely
- Access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the matter

- Communications and documents relating to the investigation of a disclosure will not be sent to an email address that can be accessed by other staff and all printing of investigation material will user security controlled

A discloser will be protected from Detrimental Conduct, including conduct such as the following:

- Termination or injury to employment (including remuneration impacts)
- Discrimination, harassment, bullying, intimidation or victimisation
- Harm or injury including psychological harm

The Corporations Act also protects a discloser against certain legal actions related to making a disclosure, including civil, criminal and administrative legal action. Any information the discloser provides will not be admissible in any criminal or civil proceedings other than for proceedings in respect of the falsity of the information or misconduct which the discloser was involved in.

Mathew Edwards
Director

17052025

Corporate Social Responsibility Policy

Stephen Edwards Constructions is committed to healthy ecosystems, social equity and good organizational governance. The company operates in a transparent and ethical manner, encouraged by management at all levels and in all business dealings. Stephen Edwards Constructions actively seeks to understand the impact of the organisations business decisions and activities on society and the environment.

The company's long-term reputation is paramount and valued over and above short-term economic gain. As such Stephen Edwards Constructions promotes an awareness of social responsibility, integration of progressive policy into all facets of the business and encourages socially responsible relationships in practice.

Stephen Edwards Constructions seeks to:

- Uphold fundamental human rights and avoid discrimination of any form, avoiding complicity and supporting resolution of grievances.
- Fulfill our legal obligations for the governance, implementation, and reporting on laws relating to corporate social responsibility and Environmental, Social and Governance (ESG)
- Engage in fair labour practices including equal opportunity employment, best practice work health and safety conditions and investment in staff development and training.
- Protect the environment and adopt practices that will assist in mitigating the effects of climate change, including sustainable use of resources and pollution minimisation.
- Conduct business with legitimate organisations that engage in fair operating practices and take their corporate responsibilities seriously.
- Value clients, consultants, subcontractors and suppliers by providing accurate marketing, quality service, support and avenues for performance feedback and improvement.
- Contribute to and promote sustainability within the supply chain.
- Contribute to positive community relations, local community involvement, welfare and development.

Mathew Edwards
Director

17052025

Workplace Bullying and Harassment Policy

Stephen Edwards Constructions (SEC) is committed to ensuring that all employees are treated fairly and equitably and are provided with a work environment that is free from all forms of bullying and harassment.

Bullying is repeated, unreasonable behaviour directed towards a worker, or group of workers, that creates a risk to health and safety. Bullying can be physical, verbal or psychological.

Harassment refers to words or behaviours that threaten, intimidate, or demean a worker, or group of workers.

Bullying and Harassment may include:

- Verbal insult or abuse.
- Repetitive, overt, unwanted, or inappropriate attention of a physical, verbal, implied, or suggestive nature.
- Unwelcome sexual behaviour that causes a person to feel offended, humiliated or intimidated, where a reasonable person could have anticipated that reaction in the circumstances.
- Spreading of rumours, or private information whether true or untrue, that would be considered inappropriate, demeaning, or defamatory to a person's character or reputation.
- Personal attack, threat, intimidation and misuse of power.
- Deliberate exclusion or isolation from workplace activities.

SEC supports the dignity and self-esteem of every person. Bullying and harassment of any kind (including victimisation and vilification) will not be tolerated. SEC treats all reports seriously and encourages all employees to report workplace bullying.

SEC's management will ensure the following:

- Complaints are dealt with promptly and in accordance with the principles of natural justice.
- Confidentiality is maintained within the procedures for resolving complaints.
- Workers are aware of their reporting options.
- Disciplinary procedures may be invoked in the case of serious or persistent bullying or harassment.
- Victimisation as a result of a complaint will not be tolerated.
- The business continues to comply with all workplace legislation related to employee rights.

SEC will also ensure that all staff are informed of this policy and managers and other supervisory staff are aware of their responsibilities in accordance with this policy.

If you feel that you may be a victim of bullying or harassment, contact your immediate Manager, Infrastructure & Assets Manager or Daniel Edwards.

Mathew Edwards
Director

17052025

Industrial Relations Policy

Stephen Edwards Constructions is committed to complying with all applicable Federal, State, and Territory legislation, regulations, codes of practice, and relevant guidelines relating to fair employment opportunities, equitable work practices, entitlements, and conditions. We are dedicated to fostering a culture of open communication and collaboration with all workplace participants to support harmonious and productive working environments.

To achieve our policy, we will maintain current knowledge of, and comply with the following Acts, Regulations, and Frameworks ;

- Fair Work Act 2009 (Cth)
- Fair Work (Registered Organisations) Act 2009 (Cth)
- Industrial Relations Act (NSW) 1996
- Workplace Relations Act (Cth) 1996 and amendments
- Workplace Surveillance Act 2005 (NSW)
- Work Health and Safety Act 2011(NSW) & Regulation 2017 (NSW)
- Workers Compensation Act (NSW)1987 and Regulation 2016
- Workplace Injury Management and Workers Compensation Act, (NSW) 1998 and amendments
- Building and Construction Industry Security of Payment Act 1999 (NSW)
- Superannuation Guarantee (Administration) Act 1992 (Cth)
- SEC Freedom of Association Policy

The success of our business is dependent on the capacity, commitments and productivity of our employees and subcontractors.

Our aim is to achieve a fair and equal workplace by:

- Ensuring all employees are treated with dignity and respect
- Ensuring effective consultation occurs in line with the SEC Consultation Policy
- Maintaining open and effective relationships with employees and subcontractors (including their HSRs and Industry Associations) to reduce the risk of delays due to industrial disputes
- Ensuring that all workplace participants are paid under formal industrial instruments, are not restricted from any allowances or agreements that form part of their employment terms.
- Maintaining a strong conflict & issue resolution practices and principles
- Responding to any issues raised by employees or identified by supervisors or by any other member of management.
- Identifying the expectations of builders and principals in regard to industrial relations processes prior to entering into contracts with them
- Cooperating with the safety management processes on the building and construction projects on which our workforce is deployed
- Complying with the NSW Industrial Relations Guidelines : Building and Construction Procurement, including informing workplace participants that they may be contacted by the Construction Compliance Unit (CCU) at any time during the project
- Reporting all breaches of the Guidelines to the CCU within 24 hours of becoming aware of the breach

All employees and subcontractors are charged with the responsibility of:

- Complying with the terms of their industrial instruments and the law
- Respecting the principles of freedom of association at all Stephen Edwards Constructions workplaces

The goal of this policy is to enable a positive and productive work environment with the aim of maintaining long term employees with retained company knowledge.

Mathew Edwards
Director

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Mathew Edwards
Director

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Equal Opportunity Policy

Stephen Edwards Constructions (SEC) acknowledge the traditional stereotype and demographic of the workforce within the construction industry and the barriers that have existed which deter or prevent minority groups from pursuing construction as a viable career pathway.

SEC is committed to removing such barriers through:

- promoting equal opportunity in employment and delivery of our services in accordance with universal principles of equity, fairness and social justice
- providing opportunities where possible for Indigenous people and enterprises, and other underrepresented groups to contribute to our building projects
- providing support to the needs of a diverse workforce and reasonable adjustments for individual requirements

This policy extends to and includes; people of all religions, ages and races including Aboriginal and Torres Strait Islanders, the LGBQTI+ community, individuals with personal, family, or medical needs, physical or mental handicaps, and any others with a heightened risk of discrimination within the workplace.

Our equal opportunity strategies include:

- celebrating our diverse workforce and encouraging open expression of self and individualism
- a continual improvement strategy that encourages anyone within our business, but particularly those with special needs to raise any issues experienced and suggestions for change
- pursuing projects through clients who require, favour, and reward businesses that promote freedom, diversity, inclusion, and the long-term needs of a harmonious Australian society
- Offering instruction and guidance to employees regarding equality, diversity, and the challenges faced by minority communities and individuals with specific personal requirements necessitating sensitivity and/or reasonable accommodations within the workplace
- ongoing monitoring to ensure that the business remains aware of its legislative framework relating to individual needs, particularly the requirements of the Fair Work Act & Regulations 2009
- ensuring that all SEC employees have access to benefits and services in an equitable manner, including assistance to reasonably accommodate a person's disability or personal needs
- providing inclusive corporate governance across the organisation, including our Workplace Gender Equality Strategy, ISLP and APP targets, and our Code of Conduct with associated policies relating to whistleblowing, bullying & harassment, and grievance management
- requiring all staff, employees, subcontractors and stakeholders ensure their conduct complies with the equity principles outlined in this policy

The effectiveness of this policy is to be periodically reviewed by the Directors.

Mathew Edwards
Director

17052025

Fraud and Corruption Policy

Stephen Edwards Constructions (SEC) is committed to creating and supporting an honest and open workplace culture that promotes fair and just ethical standards. Fraud is incompatible with our culture and presents a risk to the achievement of SEC's strategic objectives. We are committed to preventing, identifying and addressing all acts of fraud and corruption against our company, with the aim of zero instances of fraud, corruption, or leaks of sensitive or confidential information. To achieve this, we will raise awareness of fraud risks and implement controls aimed at reducing the opportunity to commit fraud and increasing the likelihood of fraud being detected.

SCOPE OF POLICY AND PURPOSE

This Policy applies to SEC's employees, clients and suppliers (incl. subcontractors).

This Policy establishes a common understanding of:

- what fraud is;
- how we prevent the risk of fraud;
- how we detect fraud; and
- the actions our people should take if they suspect fraudulent activity.

WHAT IS FRAUD?

Fraud is dishonestly obtaining a benefit, or causing a loss, by deception or other means. The term 'fraud' refers to an intentional act by one or more individuals involving the use of deception to obtain an unjust or illegal advantage. The key element of fraud is dishonesty. For the purposes of this Policy, 'fraud' includes attempted fraud and consists of, but is not limited to the following:

Asset Misappropriation - Cash

- Theft of cash
- Theft of funds through electronic banking

This includes any borrowing of funds that does not have the explicit approval of SEC's directors.

Asset Misappropriation – Non-cash

- Theft of plant and equipment, inventory or consumables
- Theft of intellectual property
- Disclosing confidential information to outside parties without authority for personal gain

This includes the borrowing / use / possession of SEC assets that does not have the explicit approval of SEC's directors.

Asset Misappropriation – Insurance

- False claim for workers compensation
- False claim for accidents or other claims

Asset Misappropriation – Fraudulent Disbursements

- Falsifying expense claims
- Corporate credit card misuse
- False invoicing
- Payroll falsification
- Forgery or alteration of any document for personal benefit

Corruption

- Recording credits for goods and services provided and refunding for personal benefit
- Secret commissions (kickbacks received by employees)
- Acceptance of goods and services as inducement to giving work to any supplier
- Collusive bidding

Fraudulent Statements

- False accounting
- Material and deliberate misstatement of accounting information
- Intentional statements of incorrect or misleading employment history / education qualifications.
- Any dishonest or misleading statement made in / on / to media, social media, person, or party that impacts or potentially impacts SEC

Confidential Information

Employees must maintain strict confidentiality with respect to all confidential information of SEC, and not disclose any of its confidential information to any other person, business, company or other body unless previously and expressly authorised in writing by SEC.

Confidentiality must be maintained with respect to all transactions, records and information relating to the business of SEC, both during and after employment with SEC. Confidential information must not be used in any manner or for any purpose other than the purpose of the business of SEC. Failure to respect confidentiality may lead to disciplinary action or legal action. Any knowledge of unauthorised use of SEC's confidential information by any other person(s) must be notified to SEC management immediately.

Confidential information includes, but is not limited to:

- all information contained in all software systems / platforms owned or used by SEC;
- all commercially sensitive information in the possession of or concerning SEC;
- clients, prospective clients, supplier and other business contact addresses and other contact details;
- client payment history;
- confidential information of, or concerning, clients, prospective customers and suppliers;
- product and pricing information;
- personal information of SEC employees or contractors; and
- all other information designated as confidential by SEC.

SEC will not use the personal information of any employee, except for the purposes of the employment or as required by law, without the employee's consent and knowledge. All private information collected by SEC as part of our business operations including personal details, health and medical records, and performance records will remain the property of SEC and records protected and maintained in accordance with our legal requirements and accreditations relating to document control.

Ownership of intellectual property

There must not be any attempts to reproduce, publish, perform, transmit, exhibit, adapt or in any way change or use any intellectual property of SEC:

- with or without attribution of authorship;
- with or without any other materials comprising copyright;
- with or without any other test data, sounds or images;
- with no title, the same title or any other title;
- in any medium or context other than as authorised by SEC.

Any discovery, invention, design, secret process, development, improvement in procedure, work in which copyright may subsist, any business name, brand or trade mark or other intellectual property, which is created or discovered in the course of duties while employed by SEC, within an SEC workplace, or by use of SEC's resources, or suggested by any work you perform for SEC, which relates in any way to, or is capable of being used or adapted for use in, SEC's business, must be disclosed to SEC, must otherwise be kept confidential, and will be the property of SEC or its nominee.

If required so to do (whether during or after the termination of the employment), workplace participants of SEC will, at the expense of SEC or its nominee, apply, or join in applying, for a patent, trade mark or other intellectual property protection in Australia or in any other part of the world, for any such intellectual

property, and execute all instruments and do all things necessary for vesting the patent or trade mark rights or other intellectual property protection, in, or transferring or assigning such rights or protection to SEC or its nominee.

By accepting this policy, it is hereby agreed that SEC are to act as your attorney to execute any instrument, and do anything, including use of your name, for the purpose of giving to SEC or to its nominee the full benefit of the provisions of this clause. Acceptance includes but is not limited to, the signing of this document, or the provision of this document to a person(s) to which objection is not received.

To the full extent permitted under Part IX of the *Copyright Act 1968 (Cth)*, SEC workplace participants voluntarily and unconditionally consent to all or any acts or omissions by SEC or its nominee, concerning any and all works in which copyright may subsist as defined by the Copyright Act which were made or are to be made by you (whether before or after this consent is given) in the course of workplace participation which would otherwise infringe any moral rights within the meaning of the Copyright Act;

- waive any and all existing and future moral rights in the works; and
- acknowledge that you have given this consent voluntarily, and without reliance

HOW DO WE PREVENT FRAUD?

A system of internal controls has been implemented to prevent fraud from occurring. Key fraud prevention controls include:

Upholding the standards of behaviour detailed within SEC's Code of Conduct.

The Code provides a set of guiding principles to help our people make decisions in their day to day work to ensure that they maintain high ethical standards.

Compliance with the law and SEC's policies and procedures.

SEC will at all times comply with relevant laws relating to the efficient and ethical handling of any alleged fraudulent activities and will implement appropriate procedures to facilitate effective outcomes.

SEC's risk management process.

SEC has adopted the risk management process and principles of ISO 31000 as part of normal business practice. To prevent fraud from occurring, SEC identifies and evaluates internal and external fraud threats and implements preventative controls that mitigate or minimise significant fraud risks.

Managers and **Supervisors** employ sound fraud risk management practices within all activities for which they are responsible and ensure the effective operation of the following preventative controls:

- adequate separation of duties (more than one employee is involved in key tasks);
- proper authorisation procedures (transactions must be recommended and approved);
- physical security of attractive items; and
- independent monitoring and checking of data and documentation.

HOW IS FRAUD DETECTED?

A system of internal controls has been implemented to detect fraud as soon as possible after it has occurred. Key fraud detection controls include:

- a whistleblower policy which promotes the reporting of misconduct
- physical checks / stock-takes / reporting / financial auditing; and
- workplace surveillance of physical and electronic workplaces

Workplace Surveillance

SEC carry on ongoing intermittent surveillance via company electronic devices (including files stored on your work computer or work phone), in-vehicle Monitoring Systems and CCTV Cameras. The surveillance is carried out by all means available to SEC which may include (but is not limited to):

- Accessing of company email accounts;
- Accessing accounts or activity logs in software platforms used for the undertaking of works for SEC
- Accessing electronic files;
- Accessing SEC owned digital assets including computers, phones, tablets and the like
- Accessing records of internet usage by workplace participants (including sites and pages visited, files downloaded, video and audio files accessed and data inputted);
- Reviewing CCTV Camera recording; and
- Reviewing in-vehicle Monitoring Systems.

SEC commit to the use of that information being for work related purposes including (but not limited to) workplace investigations, and all obtained records will be kept securely stored.

Investigation

Should there be any suspicion or allegation of fraudulent activity, an investigation will be undertaken by appropriately parties depending on the matter and the content of the disclosure. The aim of the investigation of the fraudulent activity is to substantiate or refute the claims. During the investigation process, supporting information and evidence collection will be sought, which may include interviews or questions involving other parties, including other SEC employees. All persons involved in investigations are to treat this information and involvement in a confidential manner – noting that an investigation does not necessitate that fraud has occurred. SEC reserves the right to engage a third party to undertake investigations in order to maintain a non-bias approach and ensure a sufficient level of professionalism and experience during investigations.

Actions you should take if you suspect Fraudulent Activity

If you see or suspect any fraudulent activity, you must report it immediately to:

- your Manager; or
- the most Senior person at your site; or
- SEC Senior Management; or
- SEC Directors

Where this is not appropriate or you wish to remain anonymous, matters may be reported to Daniel Edwards by the methods listed below:

Phone: 0418 650 980
Email: dedwards@stephenedwards.com.au
Mail: Daniel Edwards, 140 Wicks Rd, Macquarie Park 2113

Where a serious allegation has been made that could result in reprisals against the Discloser, the recipient of the information (such as the Manager or Senior Manager) must treat the disclosure confidentially and immediately report the disclosure to Daniel Edwards.

Breaches

SEC takes any failure to comply with this Policy very seriously. In certain circumstances, a breach of this Policy could be referred to an appropriate authority for further investigation. A number of consequences could flow from a breach, including termination of employment or contract and prosecution. To help you comply with this Policy, we will:

- Inform you about the contents of this Policy and your obligations; and
- provide adequate resources to manage and investigate breaches of this Policy.

RESPONSIBILITIES AND AUTHORITIES

Employees must:

- comply with this Policy and perform their duties with honesty, integrity and in an ethical manner;
- if they see or suspect fraudulent activity, report that suspected fraudulent activity immediately; and
- notify their manager if they do not understand any part of this Policy.

Managers and Supervisors must:

- comply with and make sure their employees know about this Policy: and
- promote sound fraud risk management practices within all activities for which they are responsible;
- ensure the effective operation of preventative and detection controls that minimise the opportunity for fraud in their area; and

REVIEW AND CONSULTATION

This document is required to be reviewed, as a minimum, every two years.

To achieve our policy, we will:

- ensure the provision of resources to which this policy requires;
- provide this policy to all relevant parties, and advise of ongoing updates;
- include the risk of fraud and corruption in our overall risk management procedures, including ongoing reviews and updates; and
- actively promote this policy through our leadership, actions, and adherence to the intent of this policy

All workers shall be instructed on the expected and acceptable practices, to ensure understanding of their personal responsibility to conduct their work in an appropriate manner. All parties are required to look out for and respond to any breaches of this policy by others.

Mathew Edwards
Director
10072025

Dispute Resolution Policy

Open communication and feedback are regarded as essential elements of a satisfying and productive work environment.

Stephen Edwards Constructions (SEC) encourages its employees to resolve any issues or concerns that they may have at the earliest opportunity with each other or, failing that, their immediate supervisor.

The preferred process involves employees resolving issues to their satisfaction internally, without feeling they have to refer to external organisations or to authorities for assistance.

SEC's Dispute Resolution Policy is governed by the principle that complaints and grievances must be dealt with in a timely manner and at the organisational level commensurate with an appropriate resolution.

All employees will have the right for a complaint to be heard through all levels of management if necessary and to feel that their complaints are treated seriously and addressed justly.

Employees have the right to raise concerns, complaints and disputes and to have the issue(s) considered and resolved, without fear of retribution.

SEC will make every effort to establish an atmosphere of trust, and open communication in order for all complaints to be dealt with in a constructive way. At all times SEC will ensure that its internal systems and structures promote justice and fairness. Where a dispute/complaint/grievance arises that is of a serious nature, SEC will allocate an impartial, appropriate and trained staff member to mediate the process, following the guides and templates provided by Fair Work Australia.

Documentation will be kept of all concerns or complaints raised and the steps taken to resolve the complaint. All records will be kept confidential.

Complaints that arise from verbal, sexual, physical or emotional harassment are addressed separately in the company's Workplace Harassment & Bullying Policy.

SEC will ensure that all employees are informed of this policy and managers and other supervisory staff are aware of their responsibilities in accordance with this policy.

Mathew Edwards
Director

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