



BUILDSAFE

SAFETY THROUGH INNOVATION.



MODERN SLAVERY STATEMENT

2023 - 2024 FINANCIAL YEAR

THIS STATEMENT COVERS THE ACTIVITIES OF THE BUILDSAFE GROUP

ABN 68 650 939 647

TABLE OF CONTENTS

The following pages of the Buildsafe Group Modern Slavery Statement address each of the mandatory criteria in section 16 of the Australian Modern Slavery Act 2018 (Cth) (the Act).

MANDATORY CRITERIA

| | |
|-----------|---|
| 01 | 1.The Reporting Entity i. Principal Governing Body Approval ii. Signature of Responsible Member |
| 02 | iii. Buildsafe's Modern Slavery Statement |
| 03 | 2.Buildsafe's Structure, Operations & Supply Chains |
| 07 | 3.Risks Of Modern Slavery Practices in our Operations & Supply Chains |
| 12 | 4.Actions taken to assess & address risks, including due diligence & remediation practices |
| 15 | 5.How can we assess the effectiveness of the actions we take to assess & address Modern Slavery risks |
| 17 | 6.The Process of Consultation with Entities that Buildsafe Owns or Controls 7.Other relevant information |



THE REPORTING ENTITY

1.

ENTITY: TURTLE BIDCO PTY LTD
BUSINESS NAME: BUILDSAFE GROUP
ACN: 650 939 647
REGISTERED OFFICE: ON WANGERRIBURRA COUNTRY
20 NEWHEATH DRIVE, ARUNDEL QLD 4214
WEBSITE: WWW.BUILDSAFE.NET.AU

Approval by the Principal Governing Body

On 17th December 2024, this Modern Slavery Statement for FY2023-2024 was approved by the Board, acting as the principal governing body of The Buildsafe Group, ACN 650 939 647, as defined by the Modern Slavery Act 2018 (Cth) ("the Act").

Signature of Responsible Member:

This modern slavery statement is signed by a responsible member of the Buildsafe Group as defined by the Act.



Jeff Fraser
Chair of the Board
17th December 2024

BUILDSAFE'S MODERN SLAVERY STATEMENT

The Buildsafe Group (Buildsafe) is pleased to produce this Modern Slavery Statement for FY2023-2024, in accordance with the requirements of the Australian Modern Slavery Act 2018 (Cth) (the Act).

This is Buildsafe's second Modern Slavery Statement. During FY2023-2024 we made strong progress on the actions and activities outlined in our inaugural Modern Slavery Statement of FY2022-2023.

Buildsafe is advancing our approach to assessing, addressing and eliminating Modern Slavery risk in our operations and supply chains, while always acknowledging that we have a responsibility under the UN Guiding Principles on Business & Human Rights (UN Guiding Principles) to protect, respect and remedy human rights in all our business activities.





2.

BUILDSAFE'S STRUCTURE, OPERATIONS & SUPPLY CHAINS

STRUCTURE.

The Buildsafe Group business is an Australian private company with its Head Office in Arundel Queensland and multiple branch operations in south-east Queensland, New South Wales and Victoria.

The Buildsafe Group business comprises the following trading entities:

- Buildsafe Australia Holdings Pty Ltd
- Buildsafe National Services Pty Ltd
- Buildsafe New South Wales Holdings Pty Ltd
- Buildsafe Queensland Holdings Pty Ltd
- Buildsafe Head Entity Franchise Pty Ltd
- Buildsafe Northern Rivers Pty Ltd

Corporate governance is provided by the Buildsafe Group Board of Directors who oversee the strategic direction and management of The Buildsafe Group entity (Turtle BidCo Pty Ltd) and each trading entity. All Buildsafe trading entities operate under the common governance and direction of the Board and our Executive Management Team.

BUILDSAFE'S STRUCTURE, OPERATIONS & SUPPLY CHAINS

OPERATIONS.

Bildsafe is one of Australia's leading providers of height safety solutions to the Australian property and construction industry. We supply and install fallguards, platforms, scaffolding and fencing as well as unique customised height safety and edge protection solutions.

We service our clients via 14 branch operations and two head offices across south-east Queensland, New South Wales and Victoria. Bildsafe has almost 500 employees and over 150 vehicles servicing our client's edge protection requirements through innovative product design, engineering and care for our people.

Since Bildsafe's inception in 2001, our primary focus has remained on being the most respected and sought after height safety provider across many of Australia's major capital cities. As a company, we place strong emphasis on developing and maintaining solid and reliable relationships with our clients, partners and supply chain.

Today, Bildsafe stands as an innovative leader in the height safety industry. Our company motto, 'Safety Through Innovation', is directly linked to providing efficient and effective height safety solutions by offering a simple, holistic service that complements the construction process. At Bildsafe, we value health and safety above all, and the Bildsafe name immediately communicates our commitment to providing a safe working environment for our staff, clients, partners and supply chain.

We are committed to ensuring that Bildsafe is more than just scaffolding – we create a legacy, and we make a difference by giving back to those in need. Our ethos positions us well for our Modern Slavery journey, as we work towards continuous improvement in assessing, addressing and eliminating Modern Slavery risk in our operations and supply chains.



BUILDSAFE'S STRUCTURE, OPERATIONS & SUPPLY CHAINS

SUPPLY CHAINS.

Buildsafe's supply chain relationships have been built over many years with reputable Australian and international businesses. Buildsafe's FY2023-2024 vendor spend includes:

- 83% of suppliers of products and services located in Australia;
- 13% of suppliers of products and services located in China; and
- Approximately 4% of suppliers of services located in the Philippines, Canada and the USA.

The following products and services make up over 90% of Buildsafe's Tier 1 supply chain spend:

SUPPLIERS - PRODUCTS

- Equipment Design /
Manufacture (China) - Buildsafe
height safety products
- Plant and General Equipment
- Fuel and Tolls

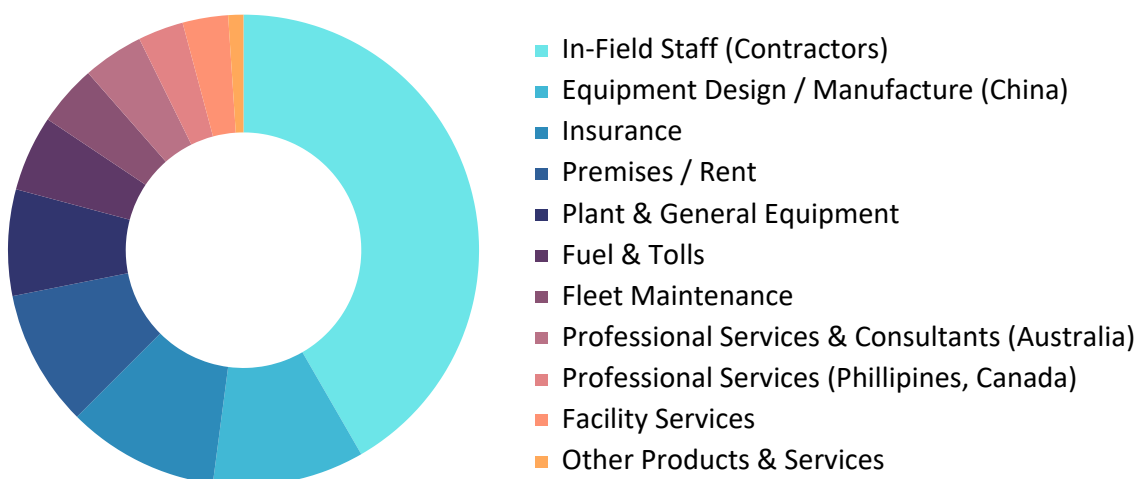
SUPPLIERS - SERVICES

- In-Field Staff (Contractors)
- Insurance
- Premises Expenses / Rent
- Fleet Vehicle Maintenance
- Professional Services &
Consultants (Australia)
- Professional Services
(Philippines, Canada) - Drafting,
Estimating, IT support
- Facility Services

BUILDSAFE'S STRUCTURE, OPERATIONS & SUPPLY CHAINS

SUPPLY CHAINS.

BUILDSAFE'S FY2024 SUPPLY CHAIN - PRODUCTS & SERVICES



Other Products and Services make up approximately 10% of Buildsafe's supply chain spend, including:

OTHER PRODUCTS & SERVICES

- Hire Equipment Manufacture (Australia)
- Freight
- Workshop and Yard Consumables
- Staff Amenities
- PPE and Uniforms
- Plant and Equipment Hire and Maintenance
- IT Equipment and Software
- Training Services
- Utilities – Electricity, Water

3. RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS & SUPPLY CHAINS

Buildsafe draws on the UN Guiding Principles to assess the risks of Modern Slavery practices in our operations and supply chains, considering the two key concepts of ‘connection to risks’ and ‘risk factor analysis’.

CONNECTION TO MODERN SLAVERY RISKS

Buildsafe acknowledges that every entity has the potential to ‘cause’, ‘contribute to’, or be ‘directly linked to’ Modern Slavery practices. By considering this, Buildsafe has developed an understanding of our connection to potential Modern Slavery risks in our operations and supply chains, and how we might mitigate or remediate situations should the need arise.

CAUSE

The risks that an entity’s operations may directly result in Modern Slavery.

CONTRIBUTE TO Modern Slavery

The risks that an entity’s operations and/or actions in its supply chains may contribute to Modern Slavery. This includes acts or omissions that may facilitate or incentivise Modern Slavery.

DIRECTLY LINKED TO Modern Slavery

The risks that an entity’s operations, products or services may be connected to Modern Slavery through the activities of another entity it has a business relationship with. A business’ relationships include all of the entities in its supply chain, including entities it does not have direct contractual relationships with.



RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS & SUPPLY CHAINS

MODERN SLAVERY RISK FACTOR ANALYSIS

Buildsafe also acknowledges that potential Modern Slavery risks in our operations and supply chains can be influenced by risk factors such as sector/industry risk, product/services risks, geographic risks and entity risks.

By considering these factors, Buildsafe identifies the areas of our operations and supply chains with a higher likelihood for Modern Slavery risks.

SECTOR OR INDUSTRY RISK

Certain sectors and industries may have high Modern Slavery risks because of their characteristics, products and processes

PRODUCT OR SERVICES RISK

Certain products and services may have high Modern Slavery risks because of the way they are produced, provided or used.

GEOGRAPHIC RISK

Some countries may have higher risks of Modern Slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty

ENTITY RISKS

Some entities may have particular Modern Slavery risks because they have poor governance structures, a record of treating workers poorly or a track record of human rights violations.

RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS & SUPPLY CHAINS

As part of Buildsafe's previous FY2022-2023 Modern Slavery Statement we undertook a detailed assessment of our operations and supply chains considering Modern Slavery risk factor analysis and connection to Modern Slavery risks. Our analysis has provided us with areas of focus to assess and address potential risks of Modern Slavery in our operations and supply chains. We focus on our high spend and higher risk Tier 1 supply chain vendors, with a view to expanding our analysis to our extended supply chains in future reporting years. Further in-depth assessment and prioritisation of risk areas is detailed in Section 4 of our Modern Slavery Statement.

OPERATIONS

Buildsafe's own operations present a range of potential Modern Slavery risks, when considering Modern Slavery risk factor analysis and our connection to Modern Slavery, as summarised in the table below.

| Buildsafe's Operations Modern Slavery Risk Factors | Global Level of Modern Slavery Risk | Buildsafe's Connection to potential Modern Slavery Risk (Cause / Contribute / Linked) |
|---|--|--|
| Sector or Industry Risks | | |
| Construction Industry | High Potential | Cause |
| Manufacturing Industry | High Potential | Cause |
| Professional Services Industry | Low Potential | Cause |
| Product or Service Risks | | |
| Construction Equipment | Mid Potential | Cause |
| Construction In-Field Services | High Potential | Cause |
| Business Professional Services | Low Potential | Cause |
| Geography Risks | | |
| Australia | Low Potential | Cause |
| Entity Risks | | |
| Australia | Low Potential | Cause |

All Buildsafe Group employees are employed under Fair Work Australia-approved enterprise bargaining agreements or individual workplace agreements (permanent, fixed term, part-time or casual contracts) that meet or exceed the minimum requirements of an applicable award.

RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS & SUPPLY CHAINS

SUPPLY CHAINS - PRODUCTS

AUSTRALIAN SERVICES

Buildsafe's local Tier 1 supply chain is made up of several vendors with operational representation in Australia. These vendors offering products manufactured both in Australia and overseas, such as plant, vehicles, construction equipment, tools, fuel, fasteners, PPE and uniforms. Many of the product suppliers are required to produce Modern Slavery Statements under the Modern Slavery Act 2018 (Cth).

INTERNATIONAL SERVICES

Buildsafe has long-term arrangements with trusted Equipment Designer / Manufacturers located in China. In FY2023-2024 these relationships represented 13% of our vendor spend. Buildsafe has a dedicated international purchasing team that works strategically and diligently with our international product suppliers. During this reporting period, we have implemented initiatives within this team to increase awareness and understanding of Modern Slavery risks, as detailed in section 4 below.





RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS & SUPPLY CHAINS

SUPPLY CHAINS - SERVICES

AUSTRALIAN PRODUCTS

In-Field Staff (Contractors): In-field staff (contractors) provide Buildsafe with labour services including erecting, maintaining and dismantling Buildsafe equipment on constructions sites. In FY2023-2024 in-field staff (contractors) made up 36% of Buildsafe's overall vendor expenditure. All Buildsafe's in-field staff (contractors) are trusted local small businesses with between one to ten employees. These contractors are often former Buildsafe employees who have received extensive training and support from Buildsafe over many years. Buildsafe's standard subcontract conditions require in-field staff contractors to meet legislative requirements, including the Fair Work Act 2009 (Cth).

Insurance: Buildsafe procures insurance through the Australian offices of large, global insurance companies. All our insurers are required to produce Modern Slavery Statements under the Modern Slavery Act 2018 (Cth).

Fleet Vehicle Maintenance: Buildsafe procures vehicle maintenance services from the Australian operations of large, global automotive companies, many of whom are required to produce Modern Slavery Statements under the Modern Slavery Act 2018 (Cth).

INTERNATIONAL PRODUCTS

Professional & Business Services Contractors: Buildsafe engages skilled contractors based in the Philippines, Canada and Malaysia to provide professional services such as engineering drafting, estimating, IT support, financial administration, project scheduling and site auditing. Our international contractors are remunerated with fair and competitive rates which are appropriate for the markets in which they operate. Contractors are hold contracts directly with Buildsafe, ensuring the terms and conditions of their engagement align with Buildsafe Policies and with the applicable laws and regulations in each country. In FY2023-2024 Buildsafe worked with 37 international contractors – 35 in the Philippines, one in Canada and one in Malaysia.

ACTIONS TAKEN TO ASSESS & ADDRESS RISKS, INCLUDING DUE DILIGENCE & REMEDIATION PROCESSES

Building on the actions stated in our inaugural Modern Slavery Statement FY2022-2023, Buildsafe made excellent progress in implementing actions to assess and address potential Modern Slavery risks within our operations and supply chains during the FY2023-2024 reporting period, including:

CREATED A BUILDSAFE MODERN SLAVERY POLICY, INCLUDING REMEDIATION PROCESSES:

During FY2023-2024 the Buildsafe Modern Slavery Policy, including remediation processes, was successfully created, finalised, and published. It is accessible to all employees via our internal document system.

Following finalisation of the policy, additional communication was distributed to our Buildsafe Procurement teams, highlighting the importance of adhering to and upholding the policy's standards in sourcing and vendor management activities. This ensures our teams are aligned with Buildsafe's commitment to ethical practices and are equipped to assess and address Modern Slavery risks within our supply chain.

DEVELOPED A BUILDSAFE SUPPLIER/VENDOR CODE OF CONDUCT, INCORPORATING MODERN SLAVERY:

During FY2023-2024 the Buildsafe Supplier/Vendor Code of Conduct, incorporating our Modern Slavery commitments, was successfully developed and distributed to our Procurement teams. This Code of Conduct sets out Buildsafe's expectations around ethical practices, providing clear guidelines for suppliers to align with our standards on Modern Slavery.

In addition to incorporating the Code of Conduct into the onboarding process for new suppliers of products and services, several existing suppliers in our supply chain have also adopted our Code of Conduct, affirming their commitment to these standards.

ACTIONS TAKEN TO ASSESS & ADDRESS RISKS, INCLUDING DUE DILIGENCE & REMEDIATION PROCESSES

INTRODUCED MODERN SLAVERY RISK REVIEWS TO BUILDSAFE'S SUPPLY CHAIN PARTNERS, STARTING WITH OUR HIGH SPEND AND HIGHER RISK TIER 1 SUPPLIERS OF PRODUCTS AND SERVICES:

As part of Buildsafe's commitment to mitigating Modern Slavery risks, we initiated a mid-year risk review during FY2023-2024, focusing on Tier 1 suppliers with high spend and higher risk profiles. This review covered 46 vendors, representing 58% of our total spend for the period. The assessment was a key first step in engaging our supply chain partners on Modern Slavery awareness, especially for international vendors who may not have been previously familiar with Australia's Modern Slavery Act 2018 and reporting requirements.

Through this review, several vendors were classified as mid-range risk, while four international vendors were identified as high-risk. These high-risk vendors represent 13% of Buildsafe's annual spend. Over the FY2025 period, Buildsafe plans to implement targeted risk mitigation strategies, focusing on closer engagement and monitoring, to help address Modern Slavery risks within our supply chain.

PROVIDED MODERN SLAVERY INFORMATION, RESOURCES AND TRAINING TO BUILDSAFE PROCUREMENT STAFF:

Buildsafe successfully fulfilled its commitment to equip our Procurement staff with the necessary resources and training on Modern Slavery. All members of Buildsafe's Procurement team took part in an introductory session that provided a comprehensive overview of Modern Slavery risks and their critical role in assessing and addressing these risks within our operations.

In support of ongoing awareness, Buildsafe also created a dedicated resource folder that includes essential information, guidelines, and reference materials on Modern Slavery. This folder now forms part of the onboarding and training process for new Buildsafe Procurement staff. This proactive approach strengthens our supply chain integrity and reinforces our compliance with Modern Slavery standards.



ACTIONS TAKEN TO ASSESS & ADDRESS RISKS, INCLUDING DUE DILIGENCE & REMEDIATION PROCESSES

RESUMED FACTORY INSPECTIONS OF HIGHER RISK INTERNATIONAL SUPPLY CHAIN PARTNERS:

During FY2023-2024, Buildsafe resumed factory inspections for selected higher risk international supply chain partners, an existing due diligence program that Buildsafe had paused due to COVID-19 travel restrictions. Buildsafe's Technical Quality Officer conducted visits to two operations in China, which together account for 5% of Buildsafe's entire annual vendor spend.

Prior to the inspection visit, the officer underwent training on Modern Slavery risks to ensure a thorough and informed assessment. During the visit, no concerns or risks were identified beyond those outlined in the standard vendor risk assessment. The outcome of this visit confirmed that these supply chain partners are adhering to existing risk management protocols, including Modern Slavery considerations.

DEVELOPED A PROCEDURE TO ENABLE BUILDSAFE TO ACTIVELY PARTICIPATE IN OUR CLIENTS' MODERN SLAVERY REPORTING PROCESSES, WHEN REQUIRED:

Buildsafe is in the Tier 1 supply chains of several large construction entities (our clients) who are required to report under the Modern Slavery Act 2018 (Cth). Buildsafe has made our FY2023-2024 Modern Slavery Statement available through our client portal, ensuring transparency and helping our clients fulfill their reporting obligations.

All future Buildsafe Modern Slavery Statements will also be published in the same location to ensure ease of access and continued support for our clients in meeting their regulatory requirements.

5.

HOW WE ASSESS THE EFFECTIVENESS OF ACTIONS WE TAKE TO ASSESS & ADDRESS MODERN SLAVERY RISKS.

Buildsafe is committed to ensuring the effectiveness of the actions we take to assess and address Modern Slavery risks in our operations and supply chains. We assess the effectiveness of our actions via internal operational monitoring, internal governance and reporting, and external reporting.

INTERNAL OPERATIONAL MONITORING.

Internal Modern Slavery monitoring and reporting now forms part of Buildsafe's standard operating procedures. During the FY2023-2024 reporting period, we introduced periodic monitoring and review points conducted by our Procurement team, reviewed by our Finance team and overseen by our Executive Management Team.

INTERNAL GOVERNANCE & REPORTING

Buildsafe has elevated Modern Slavery risk monitoring and reporting to the highest levels of our organisation. Modern Slavery has been included in our internal audit processes, as well as our integrated risk management framework and monitoring systems. These are managed by Buildsafe's Executive Management Team, with oversight and ultimate responsibility resting with our Board of Directors. Buildsafe's Board monitors the progress of our Modern Slavery actions at least six-monthly, via periodic consideration of our risk management framework and our annual Modern Slavery Statement.



HOW WE ASSESS THE EFFECTIVENESS OF ACTIONS WE TAKE TO ASSESS & ADDRESS MODERN SLAVERY RISKS.

EXTERNAL REPORTING

Buildsafe's FY2023-2024 Modern Slavery Statement will be submitted to the Australian Online Register of Modern Slavery Statements where it is publicly available for all stakeholders to view and consider.

Our Modern Slavery Statement is also available via our Client Portal on our Buildsafe website. It is also available on request for any clients, partners, supply chain members or other stakeholders who wish to review it.



6. THE PROCESS OF CONSULTATION WITH ENTITIES THAT BUILDSAFE OWNS OR CONTROLS

As detailed in Section 1, Buildsafe Group (Turtle BidCo Pty Ltd), as the Modern Slavery Statement reporting entity, owns and controls several other entities for administrative and accounting purposes.

All Buildsafe entities work closely together, with operational oversight provided by a common Executive Management Team and governance by our Board of Directors. All Buildsafe entities adhere to the same organisation-wide policies and procedures set by Buildsafe Group, which will include the Buildsafe Modern Slavery Policy once developed.

Consultation across all the entities that Buildsafe Group owns and controls occurs via our Executive Management Team which is responsible for all Buildsafe's related entities. The Executive Management Team oversee the Modern Slavery statement processes and, as such, Buildsafe is satisfied that the Modern Slavery risks relating to its entities will be appropriately identified, assessed and addressed where necessary.

7. OTHER RELEVANT INFORMATION

Buildsafe's knowledge and understanding of Modern Slavery risks has grown during FY2023-2024 and we remain committed to reducing potential Modern Slavery risks in our operations and supply chains, in line with the UN Guiding Principles.

Buildsafe looks forward to expanding our Modern Slavery actions during the FY2024-2025 period and beyond, including:

- Embed Buildsafe's Modern Slavery Policy: including training and support to reinforce policy understanding and further application across all relevant Buildsafe departments.
- Expand application of Buildsafe's Supplier/Vendor Code of Conduct, incorporating Modern Slavery: continue to apply the Code of Conduct to new suppliers and progressively apply to Buildsafe's existing suppliers.
- Update Buildsafe's subcontractor agreements (and standard form) to include Modern Slavery clauses
- Achieve Buildsafe Board approval and implement Buildsafe's Grievance Policy, and Buildsafe's Whistleblower Policy, including Modern Slavery.
- Expand application of the Buildsafe Modern Slavery Risk Assessment & Due Diligence Tool to ongoing/rolling Supplier reviews.
- Expand Modern Slavery risk reviews of Buildsafe's supply chain partners, including closer engagement and monitoring.
- Identify relevant industry collaboration opportunities and initiatives related to Modern Slavery, such as information sessions, webinars, newsletters etc.



SAFETY THROUGH INNOVATION.