



MODERN SLAVERY STATEMENT

Made pursuant to the Australian
Modern Slavery Act 2018



Table of Contents

About this Statement	<u>Page 3</u>
Our Purpose & Values	<u>Page 4</u>
Structure, Operations & Supply Chains	<u>Page 5</u>
Modern Slavery Risks	<u>Page 6</u>
Governance, Policies & Risk Management	<u>Page 7</u>
Actions Taken & Effectiveness	<u>Page 8</u>
Consultation	<u>Page 9</u>
Continuous Improvement	<u>Page 9</u>



About this Statement

This statement is made on behalf of GVG Equity Pty Ltd (GVG) 74 608 232 711, and its controlled entities, for the financial year ending June 30 2025. GVG is an Australian-owned property development and building company, operating primarily in South East Queensland (SEQ). GVG operates as a unified business comprised of the following controlled entities:

- GVG Projects Pty Ltd ABN: 79 127 847 787,
- GVG Construction Pty Ltd ABN: 58 635 825 375
- GVG Design Pty Ltd ABN: 23 686 290 675
- GVG Sales Pty Ltd: ABN: 34 605 694 077
- GVG Living Pty Ltd ABN: 31 618 404 578
- Bokarina Projects Pty Ltd ABN: 95 644 782 516
- Bokarina Projects No 2 Pty Ltd ABN: 47 661 479 278
- Bulcock Projects Pty Ltd ABN: 39 673 360 695
- Bulcock Projects No 2 Pty Ltd ABN: 62 693 684 525
- Buckland Projects Pty Ltd ABN 95 653 178 155
- Cleveland Projects Pty Ltd ABN 41 686 627 716
- Flora Projects Pty Ltd ABN 45 653 998 504
- Illawong Street Projects Pty Ltd ABN: 78 691 259 435
- Kittyhawk Projects No 2 Pty Ltd ABN : 32 629 059 712
- Mawarra Street Projects Pty Ltd ABN: 56 682 734 470
- Redcliffe Parade Projects Pty Ltd ABN: 52 639 029 708
- Redcliffe Parade Projects No 2 Pty Ltd ABN 90 692 577 807
- Redcliffe Parade Projects No 3 Pty Ltd ABN : 79 692 577 763

In FY2024/25 our annual consolidated revenue was in excess of \$217,500,000 operating several developments in SEQ. Our speciality is in acquiring suitably-placed vacant sites in SEQ and taking these through the development, preconstruction, construction and handover phases to provide apartments that meet the expectations of our buyers and enhance the communities in which they exist. Our company motto is “we care how you live”. This extends beyond our clients, staff and vested stakeholders to the wider community.

GVG is committed to ethical conduct and maintaining a zero-tolerance approach to modern slavery in our operations and supply chains, in compliance with the Modern Slavery Act 2018. We recognise that the construction sector is an industry with an elevated risk profile for modern slavery and take preventative measures to ensure we don't participate in such practices.

Our goal is to provide buyers, end users and building managers of our projects a high quality, functional and enduring product that facilitates the enjoyment of the lifestyle that South East Queensland offers, while consistently meeting the requirements of all stakeholders.

Our Purpose & Values

We are an award-winning property development and building company with over 35 years of experience building & developing across South East Queensland. Over the last 10 years, our primary focus has been on apartment and townhome developments.

We are at home in SEQ, understanding the Sunshine Coast, Moreton Bay, Brisbane and the Gold Coast market intimately. Our expertise is in the design and development of homes to suit liveability in exceptional locations.

But most of all, as a partner, supplier or client –

We care how you live.



WE ARE

Guided by Integrity

We are humble, and aligned by our commitment to excellence - consistently delivering value by doing the right thing, excelling in our roles and supporting one another.



WE ARE UNITED AS

One Team One Vision

A deeply connected, high-performing team, driven by passion and united by shared purpose of leaving a lasting legacy.



WE STRIVE TO BE

Better Everyday

We aim to grow as individuals and continuously refine our processes, to build a stronger company - focused on delivering value that benefits everyone.

Structure, Operations & Supply Chains

Structure

GVG operates through a vertically integrated business model, managing all phases of property development and construction. Our core activities include development management, design coordination, construction delivery, and sales. Our primary focus is on high-quality apartments, townhomes, and commercial tenancies across SEQ, including Brisbane, the Sunshine Coast, Moreton Bay, and the Gold Coast.



Site Acquisition



Design Coordination



Construction



Sales

Workforce

GVG employs approximately 85 direct employees across development, construction, sales, marketing, and corporate services. On-site delivery relies on a wide network of subcontractors, consultants, and suppliers.



Development



Design & Construction



Sales & Marketing



Corporate Services

Supply Chains

GVG's supply chains are multi-tiered and complex, typical of the construction industry. While we prioritise Australian-based suppliers and subcontractors, many construction materials involve upstream manufacturing and processing outside Australia.

Key supply categories include:



Trade subcontractors and labour hire



Construction materials (concrete, steel, finishes)



Building services and equipment



Professional and Corporate services

Modern Slavery Risks

GVG recognises that the construction sector carries an elevated modern slavery risk profile, particularly within material supply chains and subcontracting arrangements.

Material-Related Risks

Medium-risk materials and products relevant to our business include:

Steel and Aluminium:

Resourcing/processing, particularly where processed offshore.

Glass and Stone:

Sourcing from international high-risk regions.

Electronics and Fixtures:

Components in electrical/lighting and HVAC equipment.

Labour-Related Risks

Key labour risks within our Australian operations and contractors include:

Vulnerable Workers:

Exploitation of migrant workers, casual labour, and those less aware of their rights.

Subcontracting:

Lack of transparency in multi-tiered arrangements and practices such as sham contracting.

Services:

Procurement of cleaning and security services, which often rely on low-skilled, vulnerable workers.

These risks are typically associated with limited supply chain transparency rather than GVG's direct procurement activities.



Governance, Policies & Risk Management

GVG's approach to modern slavery is underpinned by a formal governance framework, including:

ENVIRONMENT, SOCIAL AND GOVERNANCE (ESG)

A framework that guides how we manage our environmental impact, social responsibility and governance practices to operate sustainably, ethically, and in compliance with regulatory and stakeholder expectations.

CODE OF CONDUCT POLICIES

A set of principles and standards that outline expected behaviour, ethical practices, and professional responsibilities for employees, contractors, and stakeholders to ensure integrity, compliance, and accountability across the organisation.

Key Controls

CONTRACTUAL CLAUSES

Supplier and subcontractor contracts include obligations to comply with modern slavery legislation and to uphold ethical labour practices throughout their supply chains.

SUPPLIER ONBOARDING & DUE DILIGENCE PROCESSES

Modern slavery risk considerations are incorporated into supplier onboarding, including pre-qualification checks and assessment of higher-risk suppliers.

WHISTLEBLOWER & GRIEVANCE REPORTING MECHANISMS

Confidential reporting channels allow employees, contractors, and third parties to report suspected or actual modern slavery concerns without fear of reprisal.

REVIEW OF PREFERRED SUPPLIERS

Preferred suppliers are reviewed periodically to reassess risk, confirm ongoing compliance, and identify opportunities for improvement.

ONGOING POLICY REVIEW AND IMPROVEMENT

Policies and procedures are reviewed and updated regularly to reflect legislative changes, emerging risks, and evolving best practice.

Actions Taken & Effectiveness

During FY2024/25, GVG implemented and progressed the following actions:

ESG Working Group (Ongoing)

Key stakeholders across the company, including the General Manager, CEO and Continuous Improvement Manager, have formed an ESG group to develop an ESG schedule of objectives the company will be aiming to meet across the 2025/26 financial year.

Bespoke Contractual Clauses (Completed)

We have implemented bespoke contract agreements which reflect the position we want to enforce with all our suppliers going forward and that reference requirements under the Modern Slavery Act 2018.

Policy Framework Development (Ongoing)

We have created several company-wide policies that solidify our standard. We continue to develop more policies going into 2025 & beyond.

Supplier Onboarding Enhancements (Ongoing)

The onboarding and pre-qualification of our suppliers has been improved to ensure due diligence isn't just assumed as part of onboarding. We will continue to enhance our approach to new suppliers into 2026.

Throughout the reporting period, GVG's primary focus has been the establishment of our ESG Working Group to drive our modern slavery strategy and deepen our understanding of the risks present across our operations and multi-tiered supply chains.

We are not yet in a position to adequately assess the long-term effectiveness of our initial actions. However, we have commenced the development of frameworks and reporting processes that will allow us to measure the impact of our policies, bespoke contractual clauses, and improved procurement procedures in future reporting periods. Moving into 2026, we are committed to refining these review mechanisms to ensure our approach to identifying and addressing modern slavery remains robust and effective.

Continuous Improvement

GVG is committed to the continuous improvement of its modern slavery framework in the next reporting period. Key focus areas include:

- Implementing a formal Procurement Policy.
- Training to key staff across our company that are heavily involved in procurement to ensure they are well-versed both in contractual clauses and our requirements under the Modern Slavery Act 2018.
- Strengthening due diligence for existing suppliers and further incorporating Modern Slavery checks into our procurement processes.

Approval

The statement has been developed in consultation with our ESG Reporting Group which has been formed on a voluntary basis to proactively manage our responsibilities as an organisation in the area of Modern Slavery, as well as other social responsibilities.

This report has been approved & minuted by the GVG Equity Pty Ltd Board Members as part of the March 2026 Monthly Board meeting. The statement is signed by our CEO & Board Member, Simon Betteridge.



Simon Betteridge
CEO
Gardner Vaughan Group

