

Slavery and Human Trafficking Statement Calendar Year 2025

June 2026

1. Identification of Reporting Entity and Purpose

This statement (**Statement**) is made on behalf of A.W. Edwards Pty Ltd (ABN 76 000 045 849) of Level 12, 558 Pacific Highway, St Leonards NSW 2065 (**AW Edwards**) and Malibru Pty Ltd (ABN 98 008 467 114) (**Malibru**) pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) (**Act**).

A.W. Edwards Pty Ltd is wholly owned by Malibru, which is a holding company only and is non-operational. Malibru is also the sole owner and holding company of Rintoul Pty Ltd (**Rintoul**), a joinery and fit out company. AW Edwards and Rintoul comprise the entirety of the Malibru held group of companies (**AW Edwards Group**). This statement is made on behalf of the AW Edwards Group, AW Edwards being the largest operational entity in the AW Edwards Group and a 'reporting entity' in its own right for the purposes of the Act. All operational AW Edwards Group entities are consulted with and made aware of modern slavery reporting and compliance requirements under the Act and as further described in this Statement.

The AW Edwards Group takes its obligations in relation to the identification, prevention and reporting of modern slavery and human trafficking seriously. It is working hard to identify and reduce the risk of modern slavery and human trafficking in its supply chains or in any part of its business and has a zero-tolerance approach to modern slavery. This Modern Slavery Policy reflects its commitment to acting ethically and with integrity in all its business relationships.

The AW Edwards Group is wholly owned by Bouygues Bâtiment International (a French construction company operating in five continents) and part of the Bouygues Group. The AW Edwards Group adheres to a worldwide group Code of Ethics and pursuant to this, undertakes to comply with the strictest legal and moral standards in the conduct of its operations.

This Statement sets out what the AW Edwards Group has done in the financial year ended 31 December 2025 to work towards ensuring that slavery and human trafficking is not taking place in any part of its businesses or supply chains.

2. Structure, operations and supply chain

Malibru is a holding company only, is non-operational and does not have any employees.

AW Edwards is a private limited company that provides building construction services in NSW to public and private sector clients. AW Edwards is incorporated in Australia and has its headquarters in St Leonards, Sydney. It has around 324 direct employees in Australia.

The AW Edwards Group is part of a group of companies worldwide which have Bouygues SA, a CAC 40 company listed on the Paris Euronext, as their ultimate parent. The

Bouygues group has over 200,000 employees worldwide and operates in approximately 80 countries.

The AW Edwards Group has a complex supply chain model that both supports its core businesses and maintains its office and technology infrastructure. It's supply chain relates mainly to the following activities:

- **Subcontracting** - the specialist contractors necessary to deliver certain construction and fit out operations on construction sites, including hiring specialist equipment;
- **Supply of specialist equipment and materials** - the purchasing of the specialist equipment, products and materials it uses in its construction and fitout projects. In this context, supply chains include Australian suppliers who procure from overseas suppliers in the Asia Pacific region, where products such as cladding, fencing, steel, mechanical and electrical components are sourced.
- **Consultancy** - professional and consultancy services from design professionals in various fields, including, without limitation, architecture, engineering (such as structural, civil, façade and mechanical and electrical) lighting, landscape design, sustainability, project management, cost consultancy and surveying;
- **Business services** - a wide range of products and services necessary to maintain normal day to day operations in its offices and on its sites to support its core business functions such as cleaning, catering and security;
- **Professional services** - professional services such as external training, audit services and advisory services in areas such as tax, regulation, insurance and law;
- **Real estate** - the leasing of office space and storage facilities to accommodate staff and plant necessary to operate its business;
- **Technology** - the systems, software and equipment that are necessary to maintain the technology infrastructure that supports the AW Edwards Group core business; and
- **Travel** - the AW Edwards Group works with a number of travel and accommodation providers such as hotels and airlines.

3. Risks of modern slavery in AW Edwards' supply chain

The AW Edwards Group considers it unlikely that it would directly cause modern slavery practices but recognises that it could inadvertently contribute to them. Risks have been identified in the following areas of supply chain:

- the procurement of equipment from overseas suppliers. Some of these suppliers, such as those manufacturing cladding, vertical transportation, mechanical and electrical components, are in countries reported (by international organisations and NGOs) to have a high prevalence of modern slavery e.g. China;
- the procurement of materials, such as cladding, for its building projects. Whilst the AW Edwards Group endeavours to purchase such materials from Australian suppliers, there are situations where such suppliers procure materials from overseas suppliers, again usually in China;

- the procurement of staff uniforms and PPE for site workers. The AW Edwards Group is aware that the textiles and clothing sector is a high-risk sector; and
- the engagement of labour through labour hire companies for execution of projects. The AW Edwards Group is aware that the labour hire industry has been highlighted as a high-risk industry for potential exploitation of migrant workers.

4. Actions taken to address modern slavery risks

4.1 Policies in relation to modern slavery and human trafficking

The AW Edwards Group has several policies and procedures which are relevant to preventing instances of modern slavery from occurring in its business or its supply chains, including having a dedicated Australian based compliance team as well as a compliance team in France, to whom breaches of any policies can be notified. In particular, the following policies are directly relevant to the subject matter of this Statement:

- **Modern Slavery Policy** - this policy specifically addresses the subject matter of the Act recognising and preventing trafficked, forced, bonded and child labour;
- **Code of Ethics** - this requires employees to comply with the principles of the United Nations Universal Declarations of Human Rights, the fundamental conventions of the International Labour Organisation, in particular, concerning forced child labour and the principles of the United Nations Global Compact;
- **CSR Charter for Suppliers and Subcontractors** - this charter sets out the standards the Bouygues Group expects from its supply chain in several areas, including compliance with labour standards;
- **Human Rights Policy** - consolidates the Bouygues Group's long-standing commitment to respecting human rights across all its entities and global operations. It sets a common core of principles, guiding the employees' actions worldwide.
- **Health & Safety policy** - this policy sets out the AW Edwards Group's commitment and approach to ensuring it provides a healthy, safe working environment for its own staff and contractors that work on-site; and
- **Speak-Up Whistleblowing policy** - this policy sets out the approach to preventing the occurrence of discrimination, harassment, bullying or victimisation in the workplace and encourages employees, subcontractors and suppliers to bring any unacceptable practices they become aware of to the attention of an Eligible Recipient under Australian Whistleblowing legislation without fear of repercussions for doing so.

These policies are available where appropriate on websites and intranets, are emailed to employees and relevant policies are made available to the supply chain during procurement.

4.2 Due diligence processes

The AW Edwards Group and its suppliers are expected to live up to and adhere to the principles set out in the Code of Ethics and CSR Charter which endeavours to reflect UN Guiding Principles 15 and 17 and demonstrate progress towards the standards set out in it.

Screening of high-risk suppliers

Subcontractors and suppliers proposed for a project from high-risk countries are screened under a Bouygues Group programme known as 'Scrutiny'. This allows elimination of subcontractors and suppliers which do not adhere with the AW Edwards Group's compliance framework. If a risk is identified, there is the opportunity through Bouygues Group procedures to arrange a physical inspection of supplier sites overseas before deciding whether to enter into a business relationship.

The scope of the screening performed depends on the country of origin and nature of the goods or services being procured, but can include financial checks, data security assessments, reference checks, obtaining copies of relevant supplier's policies and procedures and on-site inspections including interviews with a supplier's employees.

Interview checklists and Invitations to Tender

The AW Edwards Group's standard form Subcontractor Interview Checklist and Invitation to Tender:

- includes questions about adherence with the Act (through an extensive modern slavery risk self-assessment questionnaire) and commitment to addressing modern slavery and human trafficking;
- requires that each Subcontractor publishes a modern slavery statement (if required by law); and
- requires any labour hire companies to provide their licence pursuant to any applicable labour hire licensing scheme,

with failure to comply with any of the above resulting in disqualification.

The AW Edwards Group includes a requirement in Invitations to Tender issued to key subcontractors for such subcontractors to be assessed and verified for compliance with matters including risks of Modern Slavery under an internationally recognised platform, EcoVadis. EcoVadis verification also works towards addressing Modern Slavery risks beyond the first tier of a supplier's subcontracting chain, which is often the biggest risk area due to how opaque subcontracting structures can be beyond the first tier. AW Edwards has a "Silver" rating under its EcoVadis verification.

AW Edwards utilises an online procurement platform called ProcurePro, which is used to onboard all vendors used by AW Edwards. ProcurePro requires that all selected vendors provide a modern slavery self-assessment questionnaire as a pre-condition to formal engagement.

Site meetings

Site teams hold meetings with its subcontractors, suppliers and consultants during which labour standards, health and safety, payment and performance issues are discussed. This allows continuous monitoring of the performance of the supply chain and prompt action when their performance falls below the required standards. Meeting with key members of

the supply chain is another way in which performance is assessed and compliance with the AW Edwards Group's contractual requirements such as the Charter, Modern Slavery requirements and Health and Safety policies is reviewed.

4.3 Risk assessment, management and remediation

The AW Edwards Group has a procurement team for each major project that assesses and manages the procurement of high value and/or high-risk goods and services in accordance with the AW Edwards Group's procurement practices and formal tendering procedures.

The AW Edwards Group also employs a team of lawyers and has a compliance team to ensure compliance with its legal and ethical obligations.

The AW Edwards Group has in place appropriate processes for reporting concerns within the business.

The AW Edwards Group has a contract suite that includes clauses requiring compliance with the Act and any applicable labour hire licensing scheme, with such clauses included in all of its contracts with suppliers, subcontractors and service providers. These clauses permit termination for non-remediation of a breach of these anti-slavery obligations by a supply chain member. These clauses are non-negotiable and any refusal to maintain these are dealbreakers for the AW Edwards Group.

To ensure that all employees and subcontractors are aware of and can utilise the Speak Up whistleblowing platform, including for risks related to modern slavery or human trafficking, the AW Edwards Group, in conjunction with the Bouygues Group, launched a poster campaign across all its offices and sites in 2025, featuring a QR code that leads directly to the Bouygues Group whistleblowing platform.

4.4 Training in relation to slavery and human trafficking

The AW Edwards Group has provided slavery and human trafficking awareness training within its business including to those personnel in the procurement and finance functions .

The AW Edwards Group organises an awareness training seminar regarding modern slavery for all of its group Project Managers and Contract Administrators. During the 2025 reporting period, training sessions were held by the legal team to further educate all existing and incoming Contract Administrators on the risk areas of modern slavery and to further explore how risks of modern slavery can be detected on a practical level with an emphasis that elimination of Modern Slavery starts with contract administrators as effective 'first responders' to any risk of Modern Slavery.

Further, the AW Edwards Group has an online training module, targeted at all staff and mandatory for procurement personnel, that seeks to raise awareness about ethics and compliance.

4.5 Evaluating AW Edwards' effectiveness of actions taken

As detailed in Section 3, the AW Edwards Group recognises that some areas of its operations and supply chain are exposed to parts of the industry that could be considered high risk and is committed to undertaking further due diligence of its supply chain over

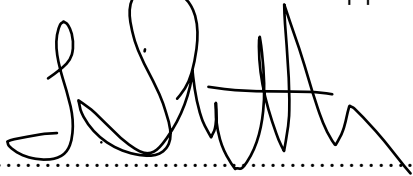
the coming year. To date, no evidence has been found of practices that violate its Modern Slavery Policy.

The AW Edwards Group will continue to assess the effectiveness of its actions by:

- continuing to enhance its screening processes particularly further down the subcontracting chain, including by widening the use of EcoVadis amongst its supply chain and seeking to improve its own EcoVadis scoring;
- utilising ProcurePro to 'tag' vendors who have provided unsatisfactory modern slavery self-assessment responses making it easier for our teams to filter out non-compliant supply chain partners;
- implementing further ethics and compliance training and awareness to wider parts of the business, including in relation to modern slavery; and
- gathering feedback from procurement, legal and HR teams to holistically consider trends in any anti-slavery cases reported including through grievance/whistleblowing reporting mechanisms.

5. Conclusion

This Statement has been approved by the Directors of Malibru Pty Ltd.

A handwritten signature in black ink, appearing to read 'Justin Smith', written over a horizontal dotted line.

Justin Smith, Chief Executive Officer of A.W. Edwards Pty Ltd (also Director of Malibru Pty Ltd)