



MODERN SLAVERY STATEMENT 2025

December 2025

INTERMAIN

CONTENTS

- 01** About Intermain
- 02** Intermain structure, operations and supply chains
- 03** Risks of modern slavery practices in the operations and supply chains of Intermain
- 04** Actions taken by Intermain to assess and address modern slavery risks, including due diligence and remediation processes
- 05** Assessing the effectiveness of actions taken by us
- 06** The process of consultation with any entities the reporting entity owns or controls
- 07** Other relevant information - the way forward for Intermain



We acknowledge the Traditional Owners of country throughout Australia and recognise their continuing connection to land, waters and culture. We pay our respects to their elders past and present. Intermain is committed to building, valuing and promoting diversity and inclusiveness.



A STATEMENT FROM THE CEO/MD

We are proud to say that we reject modern slavery in all its forms across our business and supply chain, and this latest statement embodies our continuing commitment to our mission to become Australia's most socially responsible builder.

Our previous statement elevated our commitment to collaborate with our internal and external stakeholders to address our modern slavery risks and improve our processes to identify, assess and manage risk in our supply chain.

As we move forward, we will continue to focus on collaborating with our internal and external stakeholders to address our modern slavery risks through the ongoing management of our vendor portal, enhancement in modern slavery training and taking action to hold stakeholders to account for non-compliance.

We are pleased to publish our Modern Slavery Statement 2025, which outlines our approach to address and minimise the risk of modern slavery in our business operations and supply chains.

A handwritten signature in black ink, appearing to be 'Andrew Johnson'.

Andrew Johnson
Chief Executive Officer & Managing Director

The Board of Andrew Johnson Holdings Pty Ltd has approved this statement on 18th December 2025

01. ABOUT INTERMAIN

Since our establishment in 2001, Intermain has become one of Australia's leading multi-skilled commercial fit-out companies. Intermain, including each of our entities, and associated entities, delivers thoughtfully considered, beautifully designed, and functional spaces for a wide range of clients; from corporate offices to heritage, government, and educational environments. As part of our national practice, we are firmly committed to conducting business with the highest integrity and in compliance with the letter and spirit of the law.

In 2018, the Australian Government introduced the Modern Slavery Act No. 153, 2018 ('the Act'), requiring large Australian companies with annual revenues exceeding \$100 million to report each year on modern slavery risk within their operations and supply chains, as well as the actions taken to address those risks.

For the purposes of the Act, Intermain's first modern slavery statement was submitted on 31 March 2021 for a Single Reporting entity, Andrew Johnson Holdings Pty Ltd, ABN 54 089 200 448 and in accordance with Section 13 of the Act. We subsequently submitted further statements for the periods ending 30 June 2022, 30 June 2023 and 30 June 2024.

This marks Intermain's fifth Modern Slavery Statement, covering the period ending 30 June 2025. It reflects our proactive approach through robust processes, frameworks, and policies to manage modern slavery risks, and reaffirms our ongoing commitment to meeting obligations under the Act.

Under the Act, modern slavery is defined as encompassing eight forms of severe exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruitment for labour or services, and the worst forms of child labour. The latter refers to situations where children are subjected to slavery or similar practices or are engaged in hazardous work.

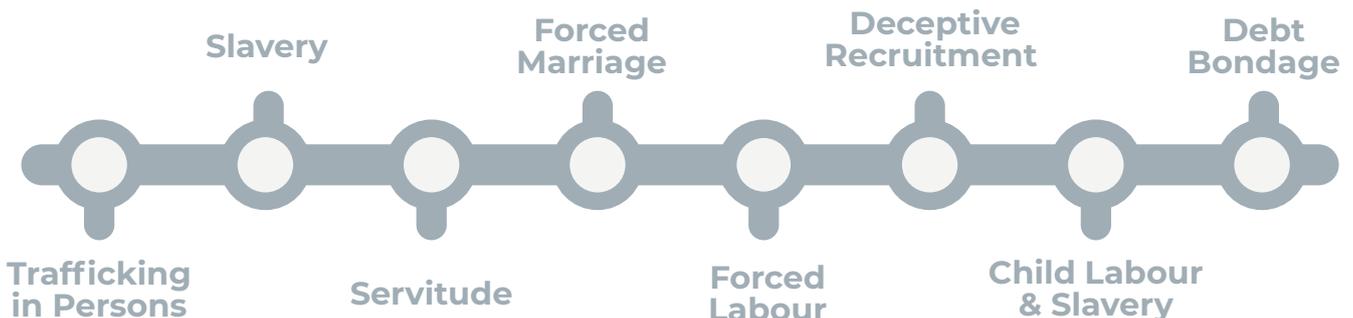
Intermain remains committed to a zero-tolerance approach to modern slavery. We continually review and strengthen our processes and systems to minimise the risk of human rights violations occurring anywhere in our supply chain. Further details on these actions, including steps taken during the past financial year to assess and address modern slavery risks, are provided in this statement.

The Intermain Group includes:

Intermain Pty Ltd	ABN 62 096 189 623
Intermain WA Pty Ltd	ABN 91 165 551 646
Intermain Queensland Pty Ltd	ABN 47 158 180 459
Intermain Victoria Pty Ltd	ABN 73 158 142 495
Intermain ACT Pty Ltd	ABN 43 632 187 592
Intermain SA Pty Ltd	ABN 73 648 554 161
Intermain Joinery Pty Ltd	ABN 25 601 801 021
Andrew Johnson Holdings Pty Ltd	ABN 54 089 200 448
Capnova Investments Pty Ltd	ABN 27 688 439 698

(hereinafter referred to as 'Intermain').

The **Modern Slavery Act 2018** defines modern slavery as including eight types of serious exploitation:



02. INTERMAIN'S STRUCTURE OPERATIONS AND SUPPLY CHAINS

Intermain has four offices in Australia, with our headquarters located in Sydney. Intermain employs approximately 127 full time staff (at 30 June 2025). In addition, Intermain has a large pool of trusted, highly skilled subcontractors. For every project, we engage a talented team of designers, builders, specialist trades, and consultants as needed. We take pride in fostering respectful relationships and believe that by doing this we create a team that is committed, dependable, and a pleasure to have onsite.

The safety and wellbeing of our employees is paramount, and we do whatever we can to keep our people healthy, supported, and engaged. Our goal is to attract and retain top talent by offering them a balance of stimulation and security within an inclusive and supportive workplace. Education and training are central to this commitment, and we ensure that staff are kept up to date with work health and safety regulations and environmental programs. Additionally, we continue to maintain rigorous compliance through regular site inspections.

MODERN SLAVERY

Intermain has strengthened its accountability by ensuring both our business and our people are aware of the risks of modern slavery in our operations and supply chains, as well as the actions taken by Intermain to address these risks. We are committed to maintaining full compliance with modern slavery requirements and take pride in upholding these standards.

SAFETY

Our accountability includes protecting the safety of our people onsite, which is non-negotiable, and Intermain is proud to have a strong record in this area.

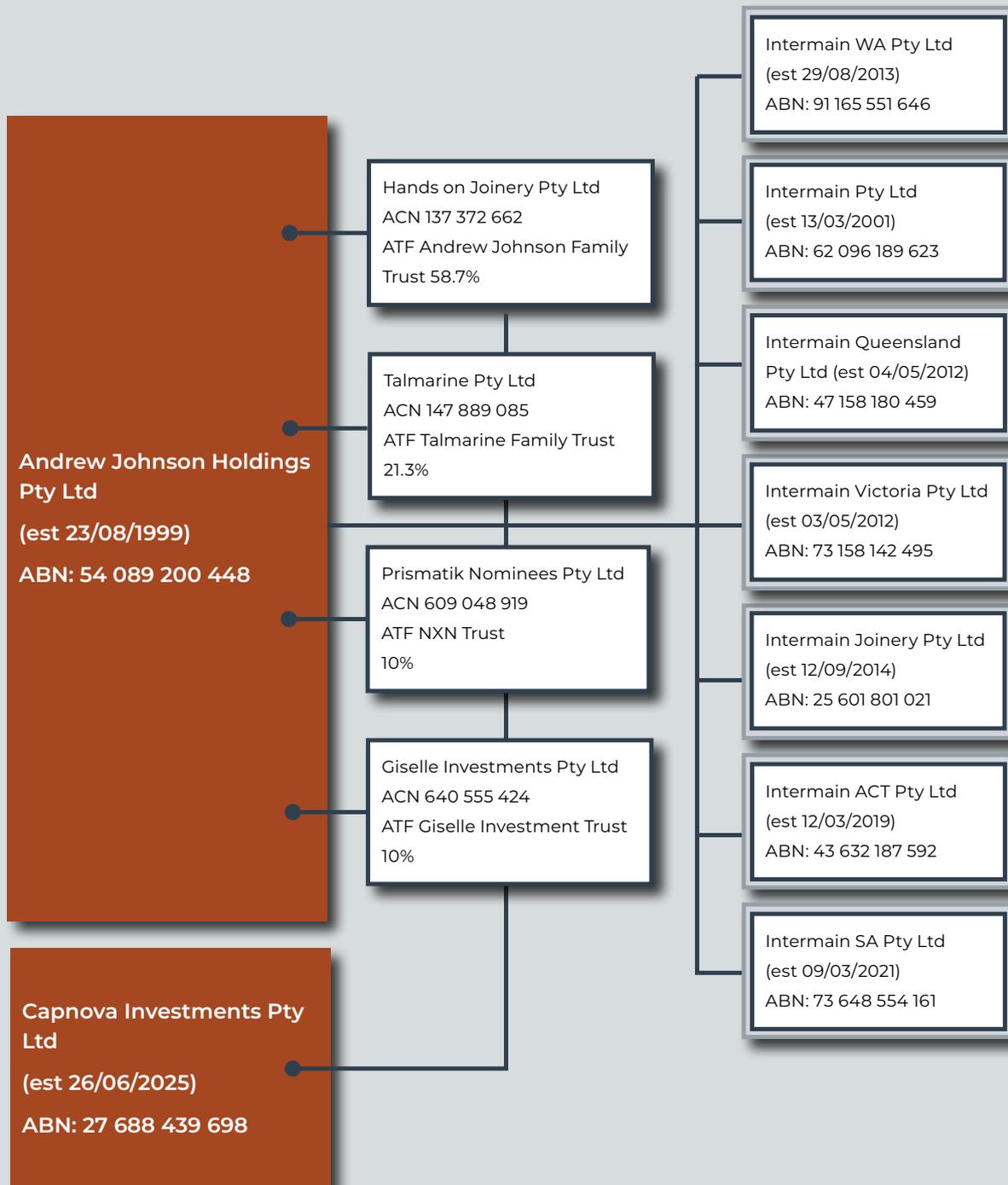
WHS

Intermain follows comprehensive Work Health and Safety (WHS) procedures, including mandatory risk assessments, hazard control measures, and emergency management planning. All subcontractors must provide Safe Work Method Statements (SWMS) for any high-risk activities prior to commencing work onsite.

DEDICATED SYSTEMS & HSEQ

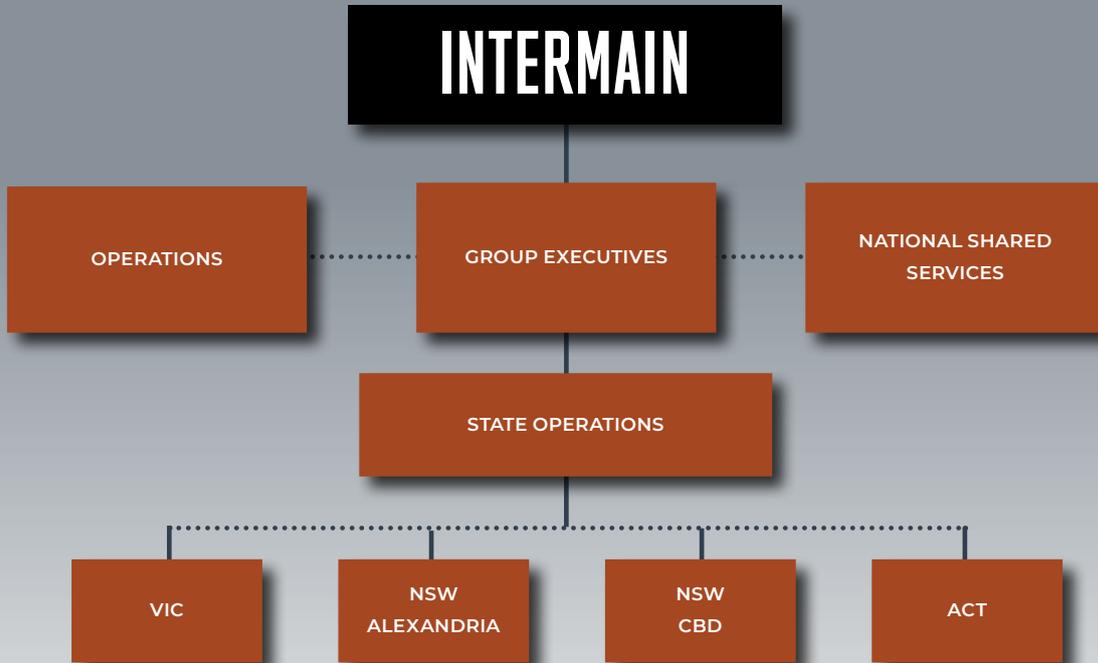
We maintain a robust Business Management System supported by our Health, Safety, Environment and Quality (HSEQ) team. This team regularly reviews site risk assessments and conducts unannounced audits to uphold our commitment to zero harm

GROUP STRUCTURE



Each of the wholly owned subsidiaries of our parent company Andrew Johnson Holdings Pty Ltd operate under the same policies, procedures, plans and integrated management system governed and managed by the Intermain Board of Directors, our Management Team and our Senior Leadership Team.

ORGANISATION STRUCTURE



The responsibility for managing and ensuring processes are established in our operations and supply chain rests with our Chief Operations Officer (COO) and HSEQ Manager, who are based in our Alexandria office. Our construction staff are responsible for managing and ensuring compliance with modern slavery requirements on the ground.



127+
Employees Nationally

Intermain provides fitout, refurbishments, joinery and building services across a diverse range of industry sectors, including:



03. RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS OF INTERMAIN

Intermain continues to remain committed to upholding the highest standards of ethics and business integrity across our operations and supply chain. We ensure that all staff and suppliers are treated fairly, with respect and dignity, reinforcing our dedication to these principles.

Intermain recognises that the greatest risk of modern slavery within our operations and supply chain lies with our subcontractors, who deliver design, construction, trade, and project management services during project delivery. All subcontractors must comply with our Subcontractor Management Procedure, a formal documented process designed to ensure consistent engagement, standardisation, and ongoing monitoring, review, and improvement. We carefully vet subcontractors to confirm alignment with legal and contractual obligations. Our commitment to high ethical standards underpins every subcontractor relationship and reflects the way we operate as an organisation.

As part of the ongoing risk assessment process and commitment to modern slavery mitigation, Intermain continues to review and monitor the Modern Slavery List of Industries and List of High-Risk Countries provided in The Global Slavery Index 2023. We also actively utilise resources from leading organisations, including: the Transparency International Corruption Perceptions Index; Global Contact Network; Global Estimates of Modern Slavery 2021; 'Hidden in Plain Sight', Report of the 2017 Parliamentary Inquiry into establishing a Modern Slavery Act in Australia; the Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities; and Report of the statutory review of the Modern Slavery Act 2018 (the first three years) completed June 2023.

We had previously identified four locally based areas of high risk to modern slavery within industries, goods and/or services, amongst our subcontractors. These include:

- 1) Electrical equipment.
- 2) Electronic equipment, instruments, and components.
- 3) IT supplies and services.
- 4) People services.

We confirm that these four risk areas are still current and continue to be considered. Additionally, our subcontractors continue to source the vast majority of goods and services within Australia or other low risk countries for modern slavery including the USA, Singapore, New Zealand, and Germany. There have been no risks of modern slavery identified within our supply chain the past financial year.

Locally based, we have identified four areas of high risk to modern slavery within industries, goods and/or services, amongst our subcontractors, namely:



ELECTRICAL EQUIPMENT



ELECTRONIC EQUIPMENT, INSTRUMENTS, AND COMPONENTS.



IT SUPPLIES AND SERVICES



PEOPLE SERVICES

04. ACTIONS TAKEN BY INTERMAIN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

We have continued to engage a consulting firm to assist us with meeting our modern slavery requirements in 2022, 2023, 2024 and now in 2025. This includes comprehensive modern slavery risk assessments across our operations and supply chain, the development of our modern slavery framework, and the preparation of our annual Modern Slavery Statements. As with previous years, this process is driven and headed by our Chief Operating Officer, supported by our internal Systems Administrator/Business Analyst, responsible for our creditors, and our HSEQ Manager, responsible for amongst others related: policy development; conducting risk assessments; training; conducting frequent inspections and site visits; and implementing preventative, detection and monitoring processes.

Our annual modern slavery assessment comprised of the following elements:

1. The review of existing risk management policies and procedures within Intermain to determine where they can be further broadened to include additional risks of Modern Slavery, through ethical sourcing, quality standards, or other compliance reporting.

2. The completion of a modern slavery risk assessment of our current suppliers in terms of our payment data, for a 12-month period from 1 July 2024 to 30 June 2025. Our list of top 50 suppliers had notably changed over the past financial year which necessitated an assessment as part of our ongoing due diligence.

SUPPLIER INDUSTRIES

- **Construction & Engineering.**
- **Commercial Services & Supplies.**
- **Construction Materials.**
- **Electrical Equipment and Electronic Equipment, Instruments & Components.**
- **Household Products.**
- **Building Products.**

IDENTIFICATION

There are currently no vendors who were identified as having provided unacceptable answers to questions in submitted modern slavery questionnaires, nor have we detected any non-compliance with our modern slavery standards internally or with our vendors over the past financial year.

04. CONTINUED

The review of our existing risk management policies and procedures continues to occur annually as part of our commitment to maintaining an up-to-date modern slavery framework. We conducted a review of all relevant policies such as: Internal Audit; Subcontractor Management; Consultant Prequalification; Vendor Application; Purchasing- Hiring Materials & Equipment; Industrial Relations; Recruitment; Standard Terms of Employment; Offer of Employment; Code of Conduct; Appropriate Workplace Behaviour; and Grievance's procedure.

As part of this review, we ensure that these policy documents refer to and include the requirements of the Act, and any subsequent legislative changes or amendments that may be introduced.

In performing our modern slavery risk assessment of our new suppliers, we considered risks that may potentially cause, contribute to, or be directly participating in modern slavery practices. Our methodology is consistent with the Act and the Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities.

These risks areas included:

- 1) Financial.
- 2) Industry.
- 3) Country (geographic location).
- 4) The use of subcontractors.
- 5) Evidence that the supplier has submitted a modern slavery statement, where applicable.

As part of our modern slavery reporting, we continue to utilise our vendor portal which has been substantially progressed over the last two reporting cycles. This portal makes provision for use by suppliers, subcontractors and consultants who wish to engage with Intermain. It includes a modern slavery questionnaire, that contains probing rather than generic modern slavery questions, which also provide for a risk rating for each relevant modern slavery question, and the submission of supporting documents to us where applicable. We continued with this vital step in identifying and where applicable, eradicating human trafficking and modern slavery, where there is any indication or slightest suspicion that this may be occurring.

For the current reporting period we appointed nine new suppliers that are now within our top 50 suppliers. The majority were appointed for single, large projects, and all scored at a low risk to modern slavery when completing our modern ethical sourcing survey (which includes a comprehensive modern slavery questionnaire). These vendors scored no more than 5 out of 21 weighted questions answered, with the majority scoring less than 2. They operate in the following industries:

- 1) Construction & Engineering.
- 2) Construction Materials.
- 3) Commercial Services and Supplies
- 4) Electrical Equipment and Electronic Equipment, Instruments & Components.
- 5) Household Products.
- 6) Building Products.

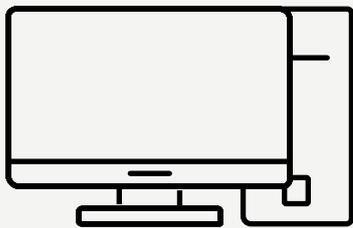
For the period 1 July 2024 to 30 June 2025, 575 modern slavery questionnaires were completed on our vendor portal. Of these, 408 questionnaires have been approved, whilst the balance are in various stages of review. This includes 103 vendors, whose status is deemed to have automatically expired, meaning that an expiry date (such as insurances) on the vendor record has been reached and the system has auto expired the record to indicate it needs to be updated. The vendor must update expired content to be re-approved. The balance of vendors comprises 47 that are pending and 15 that were denied or revoked.

There are currently no vendors who were identified as having provided unacceptable answers to questions in submitted modern slavery questionnaires, nor have we detected any non-compliance with our modern slavery standards internally or with our vendors over the past financial year.

05. ASSESSING THE EFFECTIVENESS OF ACTIONS TAKEN BY US

We have described our actions taken in the immediate assessment of modern slavery risk within our operations and supply chain. This includes an initial policy review, the refinement of existing policies, and a risk assessment for our new high-spend suppliers.

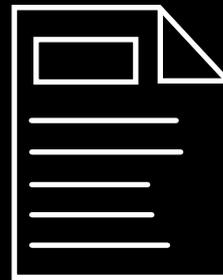
In doing so Intermain continues to map out key parts of our operations and supply chains to improve understanding of potential modern slavery risks both internally and through communication with our suppliers.



VENDOR PORTAL

All new and existing suppliers, subcontractors and consultants continue to be vetted for modern slavery risks through our refined vendor portal, including the completion of a questionnaire that incorporates modern slavery requirements and the provision of supporting documents where applicable. The portal remains as a prerequisite/precondition to the establishment of new vendors.

Intermain will continue to use the portal and the information obtained through it to foster transparent and collaborative relationships with vendors. We will ensure that expectations regarding the reporting of modern slavery risks within vendor's supply chains are clearly communicated and that we have verified these risks are effectively managed. This ongoing approach reinforces our commitment to ethical practices and builds on the actions outlined in Section 4 of this statement.



POLICY REVIEW

Over the next financial year, we will continue to review and update our policies to ensure they incorporate the most up-to-date and accurate modern slavery compliance requirements. Intermain staff and, where applicable, vendors, are required to certify annually that they have read and understood these policies. We remain committed to regularly reviewing and strengthening our internal controls and procedures to monitor their effectiveness and address any gaps. Where necessary, this includes updating policies and processes to maintain best practice and compliance.

06. THE PROCESS OF CONSULTATION WITH ANY ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS

The Intermain Group is centrally controlled and managed from Sydney by a tightly held group of shareholders of the ultimate holding company Andrew Johnson Holdings Pty Ltd. Modern Slavery requirements were originally discussed with this management group and a sub-committee was formed to work with a third-party consulting firm to develop our modern slavery framework.

All new and enhanced policies are always tabled for approval to the management team, and all policies are rolled out to all companies within the group and business units simultaneously. All existing staff within the Intermain group have undertaken modern slavery training and feedback is encouraged.

This training has been incorporated into our new employee induction onboarding process and continues to be an induction requirement for all employees. We have developed a new course 'Modern Slavery Awareness (AU)' that was rolled out from September 2024 for all new starters and all staff who completed the initial training. We have also implemented a process for staff to complete a refresher course every two years.

The COO & HSEQ Manager have attended webinars to keep abreast of any changes, including Modern Slavery Grievance Mechanisms in April 2025. This was a modern slavery training course run by Informed 365. This webinar is for professionals looking to enhance their understanding of how to handle Modern Slavery Grievance Mechanisms, the systems used to raise, assess, investigate, and respond to concerns, feedback, and complaints.

07. OTHER RELEVANT INFORMATION - THE WAY FORWARD FOR INTERMAIN

In order to build on the modern slavery framework we have established to date, we will continue to focus on the following areas:

01.

Continue to strengthen internal accountability standards and procedures, ensuring employees and vendors are held accountable for any non-compliance with our modern slavery and human trafficking standards. Where breaches occur, we will maintain and enhance processes for remediation. As reported earlier in this statement, we have enforced accountability by actioning administrative requirements, resulting in 103 vendors whose status automatically expired and 15 vendors whose status was denied or revoked.

02.

Work collaboratively with vendors to design and communicate clear expectations, informed by insights from our portal, requests for additional information, and engagement to address key issues or concerns.

03.

Maintain meaningful and sustainable engagement with workers and their representatives, including on-site subcontractors, wherever practical, to reinforce transparency and ethical practices.

REACH OUT

Book a
consultation



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Melbourne
| Kulin Nation

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Canberra
| Ngunnawal

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