

MODERN SLAVERY STATEMENT

FOR REPORTING PERIOD: 1 JANUARY 2023 - 30 JUNE 2024

ACKNOWLEDGEMENT OF COUNTRY

SITZLER RECOGNISES THE RICH HERITAGE OF THIS COUNTRY, ACKNOWLEDGING THE TRADITIONAL OWNERS AND CUSTODIANS OF THE LAND AND THEIR CONTINUING CONNECTION TO LAND, WATERS AND COMMUNITY. WE PAY OUR RESPECTS TO ELDERS BOTH PAST AND PRESENT. WE EXTEND THAT RESPECT TO ALL FIRST NATIONS PEOPLE THROUGHOUT THE COUNTRY - PARTICULARLY IN THE AREAS WHERE WE LIVE AND WORK.

OPERATING FOR OVER 40 YEARS, SITZLER IS 100% AUSTRALIAN-OWNED AND IS ONE OF AUSTRALIA'S LEADING MID-TIER CONSTRUCTION COMPANIES. SITZLER HAS EXPERIENCE IN PROVIDING A DIVERSE RANGE OF CIVIL AND BUILDING CONSTRUCTION SERVICES TO LOCAL AND FEDERAL GOVERNMENT CLIENTS AND IS LOCATED AND LICENCED TO DELIVER PROJECTS ACROSS AUSTRALIA.

We recognise that the diversity of products and services our subcontractors and suppliers provide have potential to expose Sitzler to modern slavery risks in the supply chain. This potential exposure is somewhat limited by the fact that our contracts are almost exlusively with Australian clients.

Sitzler is a reputable company with strong cultural values demonstrated with policies, systems and procedures set in place to identify, assess, engage and manage subcontractors and suppliers. As part of our third-party accredited management system, Sitzler has specific engagement and procurement procedures detailing the expectations prior to a subcontractor or supplier being engaged.

We proactively undertake steps within the procurement process to understand, address and eliminate modern slavery in our business and supply chain. These include:

- We prioritise engaging with existing known Australian suppliers and subcontractors
- Subcontracts require the supplier or subcontractor to warrant they will comply with all legislative requirements and additionally contain a modern slavery clause similar to those we are bound by within our own client agreements
- We work with subcontractors and suppliers who commit to operating to the same standards as we apply.

In the reporting period our focus has been on awareness raising and governance, and our key highlights include:

- ✓ Introduced an internal Modern Slavery Action Group
- Achieved 100% completion rate for modern slavery awareness training by the Executive Leadership Team, and Modern Slavery Action Group
- ✓ Joined Informed 365's Property Consortium to assist in capturing and assessing modern slavery risks within our supply chain
- Reviewed and updated our management system documents and business systems.

Our approach for modern slavery is future focused, and we have identified the following focus areas for improvement:

- Progress the roll out of modern slavery awareness training, seeking to achieve 80% completion of the training by the senior leadership, and project leadership teams
- Engage with our supply chain to progress our supply chain transparency
- Begin mapping our 'high priority' trade categories within our supply chain.

I thank our employees and our supply chain partners for their ongoing support and cooperation as we work collaboratively to reduce the risks of modern slavery in our industry and beyond.



Jamie Porrovecchio GENERAL MANAGER SITZLER PTY LTD

01 IDENTIFICATION OF REPORTING ENTITY

This Modern Slavery Statement has been prepared and submitted under section 13 of the *Modern Slavery Act 2018* (Cth) by Sitzler Pty Ltd (Sitzler) as a single reporting entity, and when we refer to "Sitzler", "we", "us", or "our" in this statement, it is a reference to Sitzler. This statement is for the 18-month period from 01 January 2023 to 30 June 2024.

This statement covers an extended period to allow Sitzler to transition from calendar year reporting to financial year reporting. Future modern slavery statements will be submitted for twelvemonth financial year periods.

Our registered office and principal place of business is: 100 Pruen Road, Berrimah, Northern Territory 0828.

This statement covers the activities of the reporting entity Sitzler Pty Ltd (ABN 17 091 273 013) (Sitzler) and the entity Sitzler QLD Pty Ltd (ABN 57 636 005 984) which is owned and controlled by Sitzler.



OUR VISION

To be a highly regarded construction company always achieving value outcomes for our clients and the community by delivering quality projects safely, in an environmentally and socially conscious manner.

OUR MISSION

To work collaboratively with our clients, employees and the community to deliver outstanding building projects from concept to operations by applying our experience and technical expertise.



"Having a great team of people to work alongside with every day is a privilege and one that I never take for granted. It is the reason we can embrace the ongoing rapid rate of change in our industry without losing touch with who we are, how we do business, and how important, our clients are to our future.

We understand that integrity, trust, value for money and quality are the key reasons people want to deal with Sitzler. After nearly 50 years it's in our DNA, it's who we are."

STEVE MARGETIC, MANAGING DIRECTOR FAICD

"Construction is in my blood and has been central to my family since before I was born. My focus is on valuing our staff and their efforts, ensuring our trade partners and contractors are offered support and guidance, and to recognise, understand and deliver outcomes to exceed our clients' expectations.

Sitzler's excellent reputation is derived from my focus on these fundamental principles."

MICHAEL SITZLER, DIRECTOR FAICD



CORPORATE STRUCTURE

ABOUT SITZLER

Sitzler is a highly regarded Australian construction company delivering quality projects in Australia, safely and in an environmentally and socially conscious manner since 1976.

Our business is based on the simple premise of honesty, integrity and being respectful to our clients, staff and trade partners which has ensured our continual growth as a trusted and professional industry specialist.

We collaborate with our clients, employees, stakeholders and the community to deliver projects of lasting quality.

CORPORATE STRUCTURE

Sitzler Pty Ltd is a privately owned business, incorporated in the Northern Territory of Australia and is a wholly owned subsidiary of Margetic & Sitzler Consolidated Holdings Pty Ltd. Sitzler Pty Ltd owns Sitzler QLD Pty Ltd.

Sitzler operates within and delivers commercial construction and civil infrastructure projects in multiple industry sectors. Our key clients include State and Territory Government entities, Commonwealth Government entities and a variety of private clients.

Sitzler also participates in joint venture and alliance projects and works.



Sitzler Pty Ltd - Directors: Stephen Margetic and Michael Sitzler

Sitzler QLD Pty Ltd

Corporate services

Civil

Commercial construction

SITZLER OPERATIONS

Sitzler's history of delivering high-profile infrastructure projects across Northern Australia presented the foundation for our expanded operations across the Southern, Western and Eastern states to service the needs of our clients. Nearly 50 years later, Sitzler is now a national delivery entity with the capability and resources to deliver construction solutions throughout Australia.

Our corporate services divisions include our highly experienced personnel that provide support and services for the operations of the business.

We maintain offices and facilities in the following regions:

- NT: Berrimah Head Office, Workshops, Yards and Depots
- SA: Unley Office and St.Mary's Warehouse
- ACT: Canberra Office
- WA: West Perth Office and Exmouth Office and Warehouse
- QLD: Twin Waters Office



OUR PEOPLE

Our people are the greatest contributors to our success. Our strength is derived from the integrity and reliability of our people who are our most important asset. We are committed to attracting, retaining and building a skilled and motivated workforce.

As an Equal Opportunity employer, we strive to be an employer of choice and pride ourselves on staff retention, team building and collective knowledge retention. Sitzler's success has been built on its staff, and the dynamic and professional culture which we continue to support.

Sitzler directly employs over 250 persons in addition to many more who are engaged by our subcontractors, suppliers, consultants and advisors.

SUPPLY CHAIN

We conduct our operations and works within Australia and seek to source our required services, materials and supplies from locally based supply chains.

Our supply chain engagements are through subcontract agreements, services agreements, consultancy agreements and purchase orders, and we maintain an approved subcontractor entity listing of more than 1,100 and a supplier network of approximately 4,000 entities.

Goods and services purchased include construction materials, uniforms, personal protective equipment, stationary, machinery, equipment hire, car and fleet leasing, design services, communications, security, trade services, labour hire, security & information technologies, insurance, legal services, waste, recycling, environmental products, consultant and technical services.

We categorise the goods and services that we procure into the following main categories:

- Labour including contractors and labour hire in accordance with all Commonwealth and State/Territory laws and requirements
- Materials such as building materials, quarried products, concrete and asphalt
- Plant and equipment

As a remote area specialist, recognised for the championing of local industry, our preference is always for the engagement of local firms who have and continue to make a commitment of permanency in the project region. This approach ensures that smaller or more obscure proponents are provided with full, fair, and reasonable opportunities to demonstrate their capacity, and to progress to engagement, especially where our projects are located in regional and remote areas.

WE COLLABORATE WITH OUR CLIENTS, EMPLOYEES AND THE COMMUNITY TO DELIVER PROJECTS OF LASTING QUALITY.

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EMPLOYEES NATIONALLY



OPERATING STATES

03 RISK OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAIN

All of Sitzler's workforce are located in Australia and are subject to Australian Federal and State/Territory laws for industrial relations, work, health and safety, and human rights. Sitzler has assessed its operations and supply chains to identify the risk factors where modern slavery practices may be inadvertently incorporated into our business operations. We acknowledge that as a result of the technical and complex nature of our operations, some of our supply chain suppliers may be sourcing individual components or raw materials from vendors in locations where modern slavery may exist.

Sitzler determines that its operations and supply chains are at a low risk of modern slavery, however these factors will continue to be monitored and managed. Our approach ensures a continuing focus on developing our understanding of the depth and complexities of these supply chains, and to support this we have become a member of the Property Consortium within the Informed 365 Modern Slavery platform. Sitzler's procurement of goods and services are majority sourced from the Australian market and as such are subject to compliance with Australian laws which do not invoke slavery practices. However, we are cognisant that the supply chain of our suppliers and subcontractors may include the sourcing of some parts or components internationally, and therefore our broad supply chains may have a heightened risk for modern slavery risks.

We have determined that the following goods and services that the business utilises may represent a heightened risk of modern slavery:

- Stationary suppliers
- Information and communication technology equipment (ICT)

- Workwear/uniform clothing
- Plant & Equipment

SUPPLY CHAIN

We understand some of the inherent factors within the commercial building and civil construction industry which contribute to the risk of modern slavery. These factors are summarised below:

- Prevalence of outsourcing, which can impact operational and supply chain transparency
- Contract terms with low margins, and program pressures
- Subcontractor workforce which is supported by migrants with temporary visa arrangements and limited local language competency
- Informal agreements for subcontractors and secondary subcontractors
- Low barriers of entry for labour hire providers
- Potential for dangerous or poor working conditions, including:
 - Workplace safety concerns
 - Workers are not being paid fairly, or having entitlements withheld
 - · Workers may be required to work excessive hours
- Suppliers and subcontractors sourcing materials and/or labour from overseas supply chains.

The following key areas of modern slavery risk within our operations and supply chain have been identified:

	Construction Supply Chains	Corporate Services (Finance, HR, IT, Legal)	Civil Supply Chains
High Risk	Ceilings & Linings Cladding & Roofing Concrete Floor Coverings Labour Hire Painting	Site & office cleaning services	
Medium Risk	Aluminium Electrical Services Hydraulic Services Joinery & Fitout Mechanical Services Reinforcement Fixing	IT services & equipment	Plant & Equipment Plant Servicing



UPDATE FOR THE STATEMENT PERIOD

In order to develop our understanding of these risk factors, we have introduced an internal Modern Slavery Action Group, with a focus on enhancing our existing systems and processes, and to identify and introduce new systems to enhance those existing systems. We are further supporting the engagement with our supplier and subcontractor network through our involvement with the Property Consortium on the Informed 365 platform.

These actions, coupled with our traditional focus on relationships, provides us with enhanced insight and understanding of the associated supply chains. This dual approach provides us with enhanced visibility across the multiple levels and numerous components of modern slavery within our supply chain.

This expanding engagement has been taken into consideration when performing our risk assessment and gap analysis.

O4 ACTIONS TAKEN

We are committed to understand, address and eliminate potential modern slavery risks in our business practices in alignment with our values:



Sitzler's assessment of the risk of modern slavery within our operations and supply chain included the consideration of those factors outlined in section 2 of this statement, which are considered to be prevalent risks for the construction industry.

Further, we considered the following:

- Sitzler's systems and processes which support the identification and mitigation of modern slavery within our supply chain
- The ability of our supply chain to identify and mitigate the risk of modern slavery within their own supply chain
- The scope of materials and goods which are sourced by
 our supply chain from high-risk overseas regions
- Our positive relationships with our supply chain.

PROGRESS IN THE STATEMENT PERIOD

The following actions have been undertaken during the Statement Period:

- Our suite of procurement documents, including subcontracts, consultant agreements, and purchase orders, were amended to update their modern slavery obligations and expectationss
- Our organisational processes were updated to include the revised procurement documents
- A Modern Slavery Action Group has been established to progress and mature our approach to modern slavery awareness across the business. Members of our Action Group represent Procurement, Commercial and Risk, WHS, Construction, Legal, and Human Resource Management disciplines

- Maintained our focus on engagement and building strong relationships with our supply chain, resulting in positive insights into the risks of modern slavery within their own supply chains
- 100% of the Executive Leadership Team and the Modern Slavery Action Group have completed the modern slavery online training module
- Engagement of Informed 365, and entry into their modern slavery Property Consortium.



FUTURE ACTIONS

Following the embedding of these new modern slavery practices in our organisation, we will explore the engagement of external consultants to identify opportunities to mature our approach, including potentially the review of our processes and procedures in managing modern slavery risk, and opportunities for introducing new frameworks and systems for the identification and mitigation of risks for modern slavery in our operations. An engagement of this nature would allow us to further develop our understanding of the gaps and opportunities for improvement, and to mature our existing modern slavery approach.

Other future actions include the development of a three-year modern slavery strategic plan.

Activity	Description	Activity timeframe		
		2024/25	2025/26	2026/27
Supply chain engagement	Use of the Informed 365 platform for engaging with subcontractors, including supply chain access to the self-assessment questionnaire			
Training	Continue the roll-out of the current training approach for modern slavery			
Industry collaboration	Participation in construction industry collaboration forums in relation to modern slavery, and in particular the Informed 365 construction consortium			
Internal policies	 Undertake regular review and refresh of internal systems and policies to ensure alignment with best practice Consider internal policies to develop clarity on employee responsibility Develop a process for employees to follow if there is an incident or suspected incident of modern slavery 			
Consultation	Mature the approach taken by the Modern Slavery Action Group			
Supply chain engagement	Enhancement of the existing, or implementation of a new subcontractor management database, inclusive of a modern slavery questionnaire			

05 EFFECTIVENESS ASSESSMENT

The effectiveness of our existing and newly implemented processes will be monitored and reviewed on an annual basis, aligning with our ISO 9001 certified Quality Management System.

We are cognisant that as we continue to develop our modern slavery approach, our approach for assessing the effectiveness of our actions in response to risks which cause, or contribute to modern slavery is also developing. The actions which we identify and deliver during the subsequent 12 and 24 months will largely inform the ongoing development of our framework for the management of modern slavery risks.

As our understanding of modern slavery risks continue to develop, our framework will continue to develop in response.



Monitor our supply chain participation on the Informed 365 Property Consortium platform



Monitor the completion rates for, and review and assess the effectiveness of, internal modern slavery training



Collate feedback from our supply chain following their completion of our onboarding process



Analysis of outcomes from the supply chain questionnaires on the Informed 365 platform; using the results to inform the risk ratings approach for our supply chain



Consult with internal stakeholders for continuous improvement of Sitzler's modern slavery strategy





In preparing this statement we have consulted with our Executive Leadership Team, General Manager, Directors, and our business representatives that form our Modern Slavery Action Group. In order to enhance our initial knowledge base, these team members were first required to complete the internal training module for managers.

Our Modern Slavery Action Group includes representatives from our primary operating regions and business units, and include representatives for the business for legal, human resource, commercial, corporate governance and risk, and industry participation perspectives. These representatives have consulted within their business units, and are contributing diverse perspectives during the development of the Sitzler modern slavery framework.

This action group may evolve further in the future to capture perspectives from project based personnel, to ensure that these diverse workplaces are considered during the development and roll-out of our approach.

07 OTHER RELEVANT INFORMATION

Sitzler has continued to develop its business processes to identify and reduce the risk of modern slavery in our organisation and supply chains, and is committed to the continuous improvement of its new and existing processes which seek to identify and address any potential risk of exposure of modern slavery in our organisation and supply chain. The combined 1 January - 30 June 2023 and 2023/2024 Financial Year Sitzler Modern Slavery Statement was approved by the Board of Directors of Sitzler and the Executive Leadership Team on 13 December 2024.

This Statement has been signed by: Steve Margetic as the Managing Director of Sitzler Pty Ltd

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