

MODERN SLAVERY POLICY

Modern slavery is a violation of fundamental human rights through the severe exploitation of other people for personal or commercial advantage. This includes securing services from children and persons vulnerable to modern slavery, slavery, servitude, forced or compulsory labour, human trafficking, debt bondage and deceptive recruiting for labour or services.

Farrelly Construction Services (FCS) is committed to eradicating modern slavery, forced labour, and human trafficking within its operations and supply chains. This policy outlines our commitment to complying with Australian legislation, including the Modern Slavery Act 2018, the provisions set forth in the legislation. We strive to ensure that all individuals involved in our business activities are treated with dignity, respect, and fairness.

This policy applies to all employees and officers of FCS. It also applies to all persons working for us or on our behalf in any capacity, including all employees, directors, officers, agency workers, seconded workers, agents, contractors, external consultants, third-party representatives and business partners, and includes suppliers.

Breaches of this policy may result in disciplinary action up to and including termination of employment and termination of our engagement with other individuals and organisations working on our behalf or our suppliers within our supply chain.

- i. Prohibiting modern slavery in all forms, including threats of violence, harassment, discrimination and intimidation within our operations and supply chain.
- ii. Ensuring that employees have freedom of movement, freedom of association and freedom to terminate employment, and communicating our expectation of the same from all our contractors, suppliers and other business partners.
- iii. Prohibiting the use of worker-paid recruitment fees within our operations and supply chain.
- iv. Prohibiting compulsory overtime within our operations and supply chain.
- v. Prohibiting child labour.
- vi. Prohibiting the confiscation of workers original identification documents and communicating our expectation of the same from all our contractors, suppliers and other business partners
- vii. Appropriately supporting victims of modern slavery in identifying access to remedy, compensation and justice.

- viii. Ensuring that we understand and comply with the labour/employment laws and laws against slavery applicable to FCS in the jurisdictions in which we operate.
- ix. Training employees to ensure they understand the standards expected of them.
- x. Implementing effective due diligence procedures and other controls to ensure modern slavery is not taking place anywhere in our own business or in our supply chains and communicating our expectation of the same high standards from all our contractors, suppliers and other business partners, that they will hold their own suppliers to the same high standards.
- xi. Ensuring that effective arrangements are in place to allow employees to report where they have concerns about modern slavery, and to ensure that such concerns are investigated and reported appropriately to the relevant authorities.
- xii. Ensuring that no one is subject to victimisation because of reporting any suspicions of modern slavery.
- xiii. Ensuring appropriate oversight of our modern slavery programme.
- xiv. Reviewing this policy regularly to ensure its effectiveness.

FCS takes a risk-based approach to identifying high-risk areas of modern slavery. We used the following risk criteria when assessing our modern slavery risks and identifying high-risk areas in our operations and supply chain:

- (i) vulnerable populations;
- (ii) high risk geographies;
- (iii) high risk industries and categories; and
- (iv) high risk business models.

We have numerous people controls in place to support the risks of Modern slavery, these include our process for onboarding new employees, wage and salary reviews for our employees and the verification of corresponding payments. Our onboarding process includes employment checks to ensure employees have Australian working rights. Our employee induction process also includes our Code of Conduct along with other FCS policies.

Supply chains in construction may mean that goods and services sourced appropriately within Australia may in fact present a high risk of modern slavery and we have identified a range of potential modern slavery risk areas that may be present in our operations and supply chain. These potential risk areas include:

- i. construction sites which can include many separate companies all working concurrently and all with their own supply chain partners that may include low-skilled workers who are especially vulnerable to modern slavery practices;
- ii. commodities and materials used in construction projects such as steel, manufactured components, cement, aggregates, bricks, plant and equipment, cables and PPE may be manufactured using modern slavery practices as workers in these industries are often migrant populations, low paid and low skilled;
- iii. procurement of high-risk subcontractors such as labour hire, cleaning and security

that, if not monitored closely, reward low price through competitive tendering and the risk is increased where these workers are low skilled or from migrant backgrounds;

- iv. technology where the raw materials required within items such as computers, phones and engineering instruments are manufactured in Asia and Southeast Asia which are seen as being particularly high risk of forced labour with large numbers of workers being migrant workers; and
- v. service providers of design, drafting and other services may exploit workers, including where these providers are in higher risk locations.

As part of a supplier or contractor commencing engagement with FCS, they are required to register in our contractor management system and be reviewed for compliance. Through this process they are asked to identify if they have a Modern Slavery Policy and Procedure that is compliant to the legislation.

This statement is signed by Kyle Farrelly in his role as CEO of Farrelly Construction Services Pty Ltd on 17th June 2024.



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Kyle Farrelly

CEO of Farrelly Construction Services Pty Ltd