
MODERN SLAVERY POLICY STATEMENT

The Commonwealth **Modern Slavery Act 2018** (the Act) entered into force on 1st January 2019. This Act requires entities based, or operating, in Australia, which have an annual consolidated revenue of more than \$100 million, to report annually on the risks of **modern slavery** in their operations and supply chains, and actions taken to address those risks.

The Management of Prime Constructions Pty Ltd is committed to ensuring that its employees, subcontractors, supply chain and consultants are not engaging in modern slavery.

Prime Constructions Pty Ltd is a privately owned construction company which was started in 1983 and operates in New South Wales and Queensland.

Our corporate values are simple and fundamental for our business, they are the foundation upon which our culture has been developed and continues to develop to meet an ever changing and challenging industry and market that we work in.

- **Integrity** – trust, actions and commitment are foremost
- **Respect** – we respect all stakeholders and expect the same in return
- **Innovation** – we explore, we think, and we look for solutions
- **Excellence** – near enough is not the benchmark

The purpose of this statement is to outline the measures and commitments that we have made as a business to ensure, where reasonably practicable, that we are fulfilling our obligations under the **Modern Slavery Act 2018** to eliminate modern slavery within the business and our everchanging supply chain.

Company Structure

Prime Constructions Pty Ltd is a privately owned business operating in the construction industry. The company is a parent company to the fully owned subsidiary company Prime Projects (NSW) Pty Ltd.

The company operates with a Board of Directors and Management Committee that meet regularly to monitor the operations and performance of the businesses.

The Directors and owners of the Company review the policies and statements annually to ensure they are current and effective.

Our supply chain is contracted in a number of direct and indirect ways as a head contractor in the construction industry and oversight is achieved through our management system and procedures where checks and balances have been developed and implemented.

Modern Slavery - Risk Assessment

We have reviewed our operations and identified key suppliers and industry sectors where there is a risk that modern slavery and their effects maybe occurring. Our review has identified the following:

- contracting labour market
- offshore supply chains

Having identified these two key areas we continue to investigate, develop and implement a number of measures to address modern slavery risk and reporting.

Response & Actions

Through our current management meeting structures, we have included Modern Slavery awareness reporting to generate discussion and to ensure our employees are aware of the company's obligations under the Act. The discussion is open and constructive and seeks to explore risks identified and any other risks that may become apparent during the operations of our business.

Contracting

Our process for assessing suppliers and subcontractors includes a Modern Slavery awareness statement and where required further questions for subcontractors.

Our subcontracts have been updated to include Modern Slavery clauses and Modern Slavery Clauses are now common in all Head Contracts that we enter into with our clients.

New Supply Chain Organisations

Our process for assessing suppliers and subcontractors includes a Modern Slavery awareness statement and where required further questions for subcontractors.

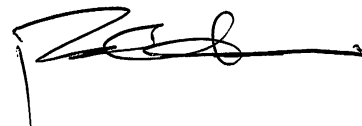
We continue to assess and vet our supply chain through the contracts that we employ. We require that our subcontractors commit to the principals and requirements of the Modern Slavery laws.

Approval of the Board of Directors

This statement is made pursuant to s.13 of the **Modern Slavery Act 2018** and s.24(2) of the **Modern Slavery Act (NSW)**. This statement has been reviewed and approved by the owners and Board of Directors who will also continue to monitor, review and update where necessary on an annual basis.



P. J. de Gail
Prime Constructions Pty Ltd
Executive Chairman



Paul Christopher
Prime Constructions Pty Ltd
Managing Director – Construction