

**north**

BUILDING WITH TRUST®

# Modern Slavery Statement

## Financial Year 2024-2025

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## 1. Introduction and Overview

North Construction & Building Pty Ltd (North) is committed to upholding human rights and ensuring that our operations and supply chains are free from modern slavery and human trafficking. We recognize that modern slavery is a serious global issue that can occur in various forms, including forced labour, debt bondage, child labour, and human trafficking. As a responsible organisation, we strive to identify, prevent, and address any risks of modern slavery within our business and among our suppliers.

Our approach aligns with the requirements of the Modern Slavery Act 2018 and reflects our dedication to ethical practices, transparency, and continuous improvement. This Modern Slavery Statement outlines the steps we take to safeguard the dignity and rights of all individuals connected to our operations.

The enclosed Modern Slavery Statement outlines the processes North have implemented with regard to Modern Slavery Risks and supply chain management, operational risks, risk mitigation, consultation and assessing policy and procedure effectiveness and continual improvement.

## 2. Executive Commitment

At North, we recognise our responsibility to uphold human rights and prevent modern slavery in all its forms.

Our Executive and Senior leadership is fully committed to implementing and maintaining robust systems and practices that identify, assess, and mitigate risks of modern slavery within our operations and supply chains.

This commitment is embedded in North governance structures and reflected in our Modern Slavery Policy and Modern Slavery Risk Management Plan. North support the objectives of the Modern Slavery Act 2018 (NSW) and affirm our dedication to taking reasonable steps to ensure that the goods and services we procure are not the product of exploitation.

North Senior Management will oversee the implementation of this Plan, ensure accountability across business units, and promote a culture of transparency, ethical conduct, and continuous improvement. North will engage with stakeholders, monitor progress, and report on actions to uphold the dignity and rights of all people affected by our business activities.

North aim to foster a culture of respect, integrity, and accountability, ensuring that our business contributes positively to the communities we serve and operates in accordance with international human rights standards.

### 3. North Policy



## ANTI-MODERN SLAVERY POLICY

This policy outlines North Construction & Building Pty Ltd 'North' commitment to identifying, preventing, and addressing modern slavery risks within our operations and supply chains.

North uphold human rights and ethical practices in accordance with the Modern Slavery Act 2018 (Cth) and other relevant legislation.

This policy applies to all employees, contractors, suppliers, and business partners engaged with our organization.

North are committed to:

- Ensuring our operations and supply chains are free from modern slavery practices, including forced labour, human trafficking, debt bondage, and child labour.
- Conducting due diligence and risk assessments to identify and mitigate modern slavery risks.
- Engaging with suppliers to promote ethical sourcing and transparency.
- Providing training and awareness to employees on modern slavery risks and reporting mechanisms.

North Management will oversee compliance and ensure implementation of this policy. Employees should report any suspected modern slavery practices through designated channels. Suppliers must adhere to our Supplier Code of Conduct and cooperate with audits and assessments and report any suspected modern slavery practices through designated channels.

North encourage reporting of any concerns related to modern slavery. Reports can be made confidentially through our reporting systems. Where modern slavery is identified, we will take immediate steps to remediate and prevent recurrence. Reporting will be completed as per legislation. North will review this policy annually and update our practices to strengthen our approach to modern slavery risk management.

Failure to comply with this policy may result in disciplinary action or termination of supplier contracts.

**North Construction & Building Pty Ltd**

Signed:   
John Melvin Date 17.12.2025  
Executive Director and Chief Executive Officer

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## 4. Modern Slavery Statement

### 4.1. Reporting Entity – North Construction & Building Pty Ltd

North Construction & Building Pty Ltd have prepared and lodged this Modern Slavery Statement in accordance with the requirements of the *Modern Slavery Act 2018* (the Act).

### 4.2. Structure, Operations and Supply Chain

North is a privately owned company with our lead office located in Tuggerah NSW.

Our business has operated successfully on the Central Coast, NSW for more than 39 years and, over those years, have grown to work more broadly in the Hunter, Newcastle, Port Stephens and Northern Sydney regions.

Since the expansion of our employee shareholding group in 2018, growth further afield into Western NSW, Northern NSW and South-East QLD regions has been carefully considered and planned to a point where we are confident our reputation of trust and the same approach to business as our historical delivery areas, particularly with subcontractors, will be upheld and successfully replicated.

Being a genuinely values-based business, TRUST, RESPECT, RELATIONAL, FUN and EXCELLENCE drive our behaviour and culture. These corporate values, combined with an unwavering commitment to all of our stakeholders, form the foundation of our company as a whole and our reputation as a trusted regional builder and employer.

North carries out both construct only and design and construct building works and has longstanding relationships with our trusted subcontractors and consultants who are engaged under subcontract agreements to assist with delivering our projects.

North Construction & Building Pty Ltd engages Cybalink Solutions, an offshore service provider based in the Philippines, to subcontract a small team of quantity surveyors and accounts professionals. North recognises the importance of maintaining robust oversight and due diligence over all offshore arrangements to ensure that the rights and welfare of all workers are respected and protected. We require Cybalink Solutions to comply with North’s Supplier Code of Conduct and all relevant modern slavery and labour standards, and we regularly review these arrangements to identify and address any potential risks of modern slavery or unethical labour practices within our extended supply chain.

### 4.3. Operational Risks and Modern Slavery

With the vast majority of North’s supply chain locally owned and operated, Modern Slavery associated risks have been identified as followed.

- Freedom of association
- Access to grievance mechanism and consultation
- Labour rights (wages, benefits, work hours, fatigue management, subcontract agreements)
- Exploitative labour conditions, underpayment, excessive hours, forced labour or debt bondage risks in supply chains and with imported goods or materials related to Subcontractors completing works under Subcontract on North Projects.

### 4.4. Modern Slavery Risk Mitigation

North maintains a proactive approach for Modern Slavery risk mitigation with respect to North employees, directly controlled workers and our supply chain, inclusive of subcontractors.

#### 4.4.1. North Employees

North is committed to full compliance with all applicable Australian workplace laws and regulations, including the Fair Work Act 2009, relevant Modern Awards, and Enterprise Agreements. We ensure that all employees receive wages, entitlements, and conditions that meet or exceed the minimum standards set by the National Employment Standards (NES). This includes proper payment of base rates, overtime, penalty rates, allowances, and leave entitlements. We regularly review our practices to maintain alignment with legislative requirements and uphold fair, equitable, and lawful employment conditions for all staff.

Upon commencement of employment with North, the employee is inducted into the company, the North Code of Conduct and all other relevant processes. The induction process ensures that all employees are aware of the organisational values and workplace standards and reporting channels for any grievances or issues that require resolution.

#### 4.4.2. Supply Chain and Subcontractors

Suppliers and Subcontractors are required to complete a Statutory Declaration stating compliance with Australian Workplace Regulations and wage entitlements. North also issues a Supplier Code of Conduct which details the minimum expectations of our suppliers in regard to complying with local laws relating to human rights, labour procurement and remuneration, work health and safety, environment and supplier diversity.

The ability of the suppliers to meet or exceed the standards detailed within our Supplier Code of Conduct documentation forms part of North's procurement strategies and are included within the general conditions of contract provided to all suppliers and contractors.

#### 4.4.3. Site Based Monitoring

North displays signage both on site and within the office regarding the identification of modern slavery within the workplace. This signage is inclusive of QR codes where reports can be made (anonymously if that is the preference) The completion of the Modern Slavery notification QR code sends an immediate electronic alert to the North System Manager, North Site Operations Manager and Systems Administrator who will then commence the investigation and reporting requirements

In addition to the signage displayed on site with the reporting QR code to report modern slavery, North uses our project compliance platform Breadcrumb to confirm the individuals right to work at time of induction.

Questions prompt to confirm residency or visa entitlements and expiration.

There is also an opportunity within the induction to confidentially report yourself as a victim of modern slavery and instruction to speak to the North Site Supervisor for further assistance.

#### 4.5. Assessing for Effectiveness

North will assess the effectiveness of our Modern Slavery risk mitigation practices by:

- Monitoring Australian workplace laws and regulations to ensure that employee wages, entitlements and working conditions remain compliant.
- Ensuring the usability of reporting channels (QR code and Breadcrumb Inductions) so that all reports are received and actioned by the appropriate personnel.
- Monitoring reporting channels for alerts
- Continuing to only engage Subcontractors capable of meeting the standards set by the Supplier Code of Conduct, Subcontracts and legislation.
- Conducting discussions regarding Modern Slavery at an Executive Level during board meetings.
- Conducting audits and implementing corrective actions
- Conduct feedback surveys to ensure awareness of North Staff regarding Modern Slavery and North's Policies and Procedures

#### 4.6. Consultation

The Executive Team at North have reviewed and approved this Modern Slavery Statement for North Construction & Building Pty Ltd.

#### 4.7. Additional Information

North is committed to continual improvement and is currently finalising a new suite of documents including an internal procedure and training module and a Modern Slavery Management annual audit.

#### 4.8. Authorisation

This Statement has been approved by all Directors of North Construction & Building Pty Ltd and has been signed by John Melvin as the Executive Director and Chief Executive Officer.



John Melvin

Executive Director  
Chief Executive Officer

Date: 17<sup>th</sup> December 2025