

BLOC HOLDINGS (ACT) PTY LIMITED (ACN 149 091 565) AND ITS WHOLLY OWNED ENTITIES

MODERN SLAVERY STATEMENT MADE UNDER MODERN SLAVERY ACT, 2018 (CTH) (THE “ACT”)

FOR THE PERIOD ENDING 30 JUNE 2021

This is the Modern Slavery Statement of Bloc Holdings (ACT) Pty Limited (“Bloc Holdings”). Bloc Holdings is the ultimate holding company of several operating entities within the construction and property development industries.

The requirements under the Act call for reporting on 7 mandatory areas. Bloc Holdings makes the following statements in relation to these areas:

1. Reporting Entity

This Statement is made under the Act by Bloc Holdings on behalf of itself and its related entities.

The primary operating entities in Australia are Bloc Constructions (ACT) Pty Limited, Bloc Constructions (NSW) Pty Limited and Bloc Operations Pty Limited (“the Group”).

2. Structure, operations and supply chains

Bloc Holdings operates primarily within Australia with a focus on the Australian Capital Territory (“ACT”) and New South Wales (“NSW”).

Senior Management reports to a board of directors being the directors of Bloc Holdings). comprised of the Australian Executive Group. This consists of Regional Managing Directors of each of our regions in Australia, the CFO and the Senior Managers of Safety, Operations, People and Legal.

Work in the ACT and NSW is undertaken by Bloc Constructions (ACT) Pty Limited and Bloc Constructions (NSW) Pty Limited respectively.

Each project undertaken has a standalone project team based on site. The director of each operating entity attends monthly project control group reviews and reviews the project status. The Group constructs buildings in a range of sectors including commercial, residential and retail.

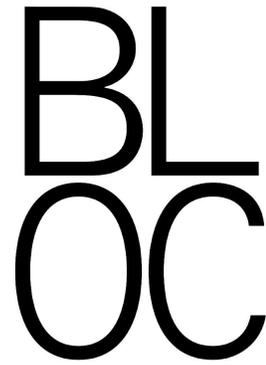
The Group operates on a subcontract model, whereby it manages a subcontractor and supplier workforce, rather than a self-delivery model. On that basis we have a wide range of subcontractors who are involved in all facets of the project delivery.

The supply chain is predominantly Australian-based with some limited direct international suppliers. Notwithstanding this, the Group recognizes that Australian-based subcontractors may use supply chains overseas. A typical example of that is façade contractors who manufacture typically in China.

3. The risks of Modern Slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

Bloc Holdings and its subsidiaries operate in an industry where subcontractors may source materials and supplies that:

- Are from countries that may be regarded as having difficult human rights environments;
- May be products that are manufactured by low skilled and/or low paid workers;
- Have workforces who may be on labour hire/day rates; and



- Are priced in highly competitive tendered markets.

Bloc Holdings and its subsidiaries engage with subcontractors and suppliers to ensure they acknowledge and understand the importance of complying with the Group's and communities' ethical expectations.

The Group is attentive to the impacts of Covid19 and how they may have exacerbated the modern slavery concerns for workforces and supply chains located in vulnerable geographies.

4. The actions taken to assess and address those risks, including modern slavery due diligence and remediation

Policies/procedures:

The Group maintains policies and procedures that sets minimum requirements to promote ethical behavior and social responsibility. These policies and procedures are regularly reviewed and amended (where required) to ensure we develop and improve. These policies and procedures include:

- Anti-Modern Slavery Policy
- Whistleblower Protection Policy and Guidelines for reporting
- Implementation of high standards of Health and Safety in the workplace for all employees, subcontractors and construction workers on sites and offices

Contractual documentation and audits

The Group ensures its contractual documentation and the process for approving subcontractors (eg. tender interviews) has appropriate questioning on modern slavery.

The Group's Company Health and Safety Manager conducts health and safety audits on its projects and on the systems and procedures of itself and its suppliers and subcontractors. All subcontractors and suppliers are subject to continual Contractor Compliance minimum requirements.

Training

The Group undertakes annual training for all employees on safety and health systems and legal and ethical obligations of all group entities. All new starters in the business are subject to a rigorous induction program that highlights safety, health and wellness. This includes relevant qualifications and certifications.

All employees have written employment contracts and associated internal policies and procedures are hosted on the internal intranet.

The Group requires compliance (through employment contracts and subcontract agreements) with its policies and procedures relating to modern slavery and worker health and safety. Typically our relationships with suppliers and subcontractors are deep and long standing relationships, often with the owner of subcontractor. We believe this is important and conducive to having frank and open discussions on tackling modern slavery and promoting ethical labour practices.

5. How the effectiveness of such actions is assessed

Bloc Holdings encourages and maintains consistent and open dialogue with employees, suppliers and subcontractors regarding modern slavery and work health and safety matters.

At the end of each project the performance of all subcontractors and suppliers is assessed and reevaluated (if necessary). Employees are encouraged to identify and alert directors and senior management to poor performing supplier and subcontractors with a focus on the area of work health and safety. This is done at monthly manager meetings.



The Group has implemented a Whistleblower Policy for the confidential and safe raising matters under the relevant Whistleblowing legislation both in Australia and globally.

6. The process of consultation with entities owned or controlled by Bloc Holdings (ACT) Pty Limited.

The Board of Bloc Holdings oversees the operations of its subsidiaries and monthly reporting takes place. This statement has been reviewed by the directors and senior management of all subsidiary companies.

7. Other relevant information

The Group is committed to improving its processes in respect of modern slavery and will continue to develop relevant training and due diligence.

All Group employees will continue to undertake general training under its codes of conduct in 2022.

This Statement for the 2021 financial year is made pursuant to section 14 of the Modern Slavery Act 2018 (Australian Government).

This Statement for financial year 2021 has been approved by the Board of Directors of Bloc Holdings (ACT) Pty Limited (being the principal governing body of the reporting entity) on 29th November 2021

Yours sincerely,

BLOC HOLDINGS (ACT) PTY LTD

A handwritten signature in black ink, appearing to read 'AR' followed by a flourish.

ANDREW REDWIN
Director

A handwritten signature in black ink, appearing to read 'AM' followed by a flourish.

ANDREW MATHIAS
Director

A handwritten signature in black ink, appearing to read 'MR' followed by a flourish.

MAURIZIO ROSIN
Director