Excell Gray Bruni

MODERN SLAVERY STATEMENT

Reporting Period

1 July 2025 – 30 June 2026

Ethical Procurement | Human Rights | Supply Chain Transparency



Building trusted partnerships
through ethical business practices.

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1 Statement from the Directors

Modern slavery is a serious violation of human rights that can occur within global supply chains, including those that support Australia's construction industry. While Excell Gray Bruni Pty Ltd (EGB) operates within Australia, we recognise that some goods, materials and services used in our projects may originate from international supply chains where the risk of labour exploitation may be higher.

At EGB, ethical business practices form part of how we operate. We are committed to identifying, assessing and managing modern slavery risks through responsible procurement, supplier engagement and risk-based due diligence. These practices support our broader commitment to integrity, accountability and respect for human rights across our operations and supply chain.

This Statement outlines the actions undertaken during the 2025-2026 reporting period to strengthen our governance, procurement processes and supplier management practices. While we have not identified any instances of modern slavery within our operations or first-tier supply chain during the reporting period, we recognise that managing modern slavery risk requires ongoing vigilance and continuous improvement.

The Board of Directors is committed to strengthening EGB's approach each year by enhancing supplier engagement, improving supply chain visibility and embedding ethical procurement practices throughout our business.

Approved by the Board of Directors of Excell Gray Bruni Pty Ltd

Neville Smith I Geoffrey Hayes I Justin Porganyi



Building trusted partnerships through ethical procurement, responsible governance and respect for human rights.

2 About This Statement

This Modern Slavery Statement has been prepared by **Excell Gray Bruni Pty Ltd (EGB)** in accordance with the **Modern Slavery Act 2018 (Cth)** and covers EGB together with the entities it owns or controls. The Statement describes our approach to identifying, assessing and addressing modern slavery risks across our collective operations and supply chains during the 2025-2026 reporting period.

The Statement has been prepared in consultation with the relevant entities within the EGB Group and approved by the Board of Directors of Excell Gray Bruni Pty Ltd. While some controlled entities have limited or no operational activities, they are included within this Statement to ensure a consistent governance framework and a unified approach to managing modern slavery risks across the Group.

Report Summary

Reporting Entity	Excell Gray Bruni Pty Ltd
ABN	32 007 387 546
Reporting Period	1 July 2025 - 30 June 2026
Legislation	Modern Slavery Act 2018 (Cth)
Approval	Board of Directors
Reporting Scope	Operations and supply chains of Excell Gray Bruni Pty Ltd and its owned and controlled entities.
Industry	Civil Construction and Landscaping

Modern Slavery is an umbrella term, which encompasses several types of human exploitation. Practices that can constitute Modern Slavery include:

- Human Trafficking
- Slavery
- Servitude
- Forced Labour
- Debt Bondage
- Forced marriage, and
- The worst forms of child labour

Excell Gray Bruni is committed to conducting business with integrity, transparency and respect for human rights. We recognise that modern slavery remains a significant global challenge and acknowledge the role Australian businesses play in preventing exploitation within complex supply chains. Through responsible governance, risk-based procurement and continual improvement, EGB works to identify, mitigate and address modern slavery risks while fostering a culture of ethical business practices across every level of our organisation.

Modern slavery has no place in our business, our projects or the communities in which we operate.

3 Our Business and Operations

Excell Gray Bruni operates within a clearly defined corporate structure that supports effective governance, financial accountability and responsible business practices. As a privately owned Australian organisation, our business entities maintain distinct operational responsibilities while working under common governance, ethical standards and strategic direction.

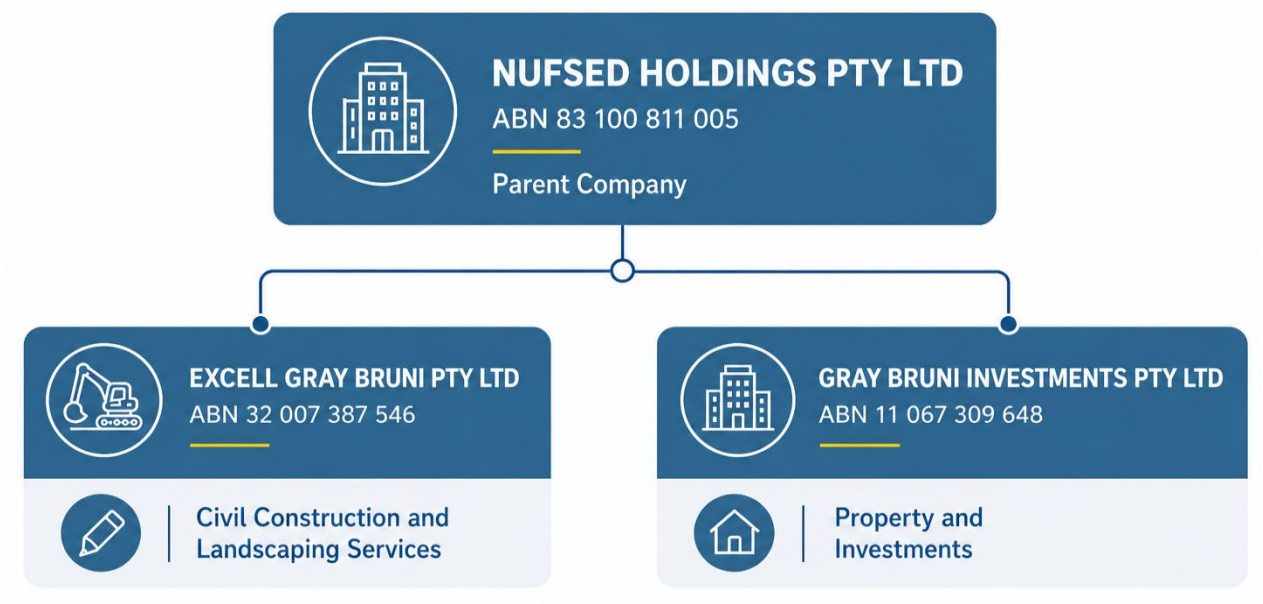
This structure enables appropriate oversight of commercial activities, financial management and project delivery while supporting long-term business sustainability. Clear reporting lines and defined legal entities provide transparency for clients, regulators, employees and supply chain partners and reinforce accountability across all areas of the organisation.

EGB operates solely in Australia in civil and infrastructure construction and landscaping services for residential property developers, commercial property developers, private landowners, local authorities, state and federal government agencies.

Core services include:

• Land Development and Remediation	• Civil Infrastructure and Maintenance
• Residential Subdivision	• Industrial and Commercial Infrastructure
• Critical Services, Sewer, Water Reticulation, Stormwater, and Drainage	• Landscaping, Streetscapes, Parks and Community spaces
• Construction of Roads, Bridges and Waterways	• Bulk Earthworks

Business Structure



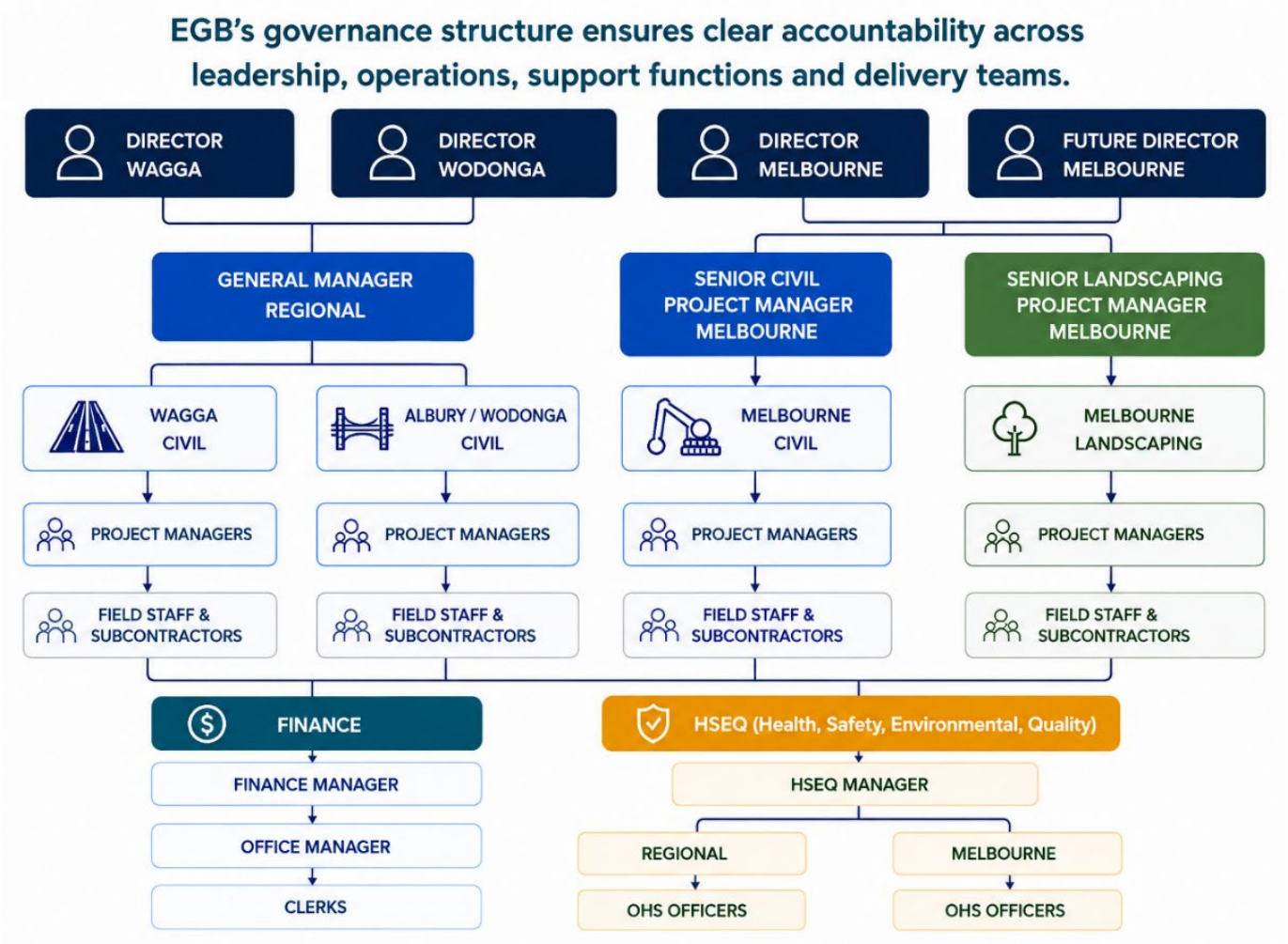
The EGB Group includes operational, asset-holding and corporate entities. While Excell Gray Bruni Pty Ltd undertakes all construction and landscaping operations, supporting entities provide plant ownership, asset management and corporate governance functions. This Statement applies across the Group's owned and controlled entities, ensuring a consistent approach to modern slavery risk management.



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4 Identifying Modern Slavery Risks within our Business

Modern slavery remains a significant global human rights issue and can affect businesses operating within complex supply chains. According to the **Walk Free Global Slavery Index 2023**, an estimated **50 million people** were living in modern slavery in 2021, including **27.6 million people in forced labour** and **22 million people in forced marriage**. More than **52% of forced labour occurs in upper-middle and high-income countries**, demonstrating that these risks are not limited to developing economies. Migrant workers are also **three times more likely to experience forced labour** than non-migrant workers, reinforcing the importance of ethical recruitment and responsible employment practices.

As an Australian civil construction contractor, EGB recognises that modern slavery risks may arise through its operations, business relationships and broader supply chain. While the inherent risk within our directly employed workforce is considered **low**, the greatest potential exposure exists within the procurement of imported manufactured products, labour-intensive industries and complex international supply chains where visibility beyond Tier 1 suppliers is reduced.

EGB assesses modern slavery risks in accordance with the **Modern Slavery Act 2018 (Cth)** by considering where our activities could potentially **cause**, **contribute to**, or be **directly linked** to modern slavery. Risk is assessed using a combination of product and service type, country of origin, supply chain complexity, labour intensity, supplier transparency and EGB's ability to influence outcomes through procurement, contractual requirements and supplier engagement.

This risk-based approach enables EGB to focus due diligence on those procurement categories where the potential for modern slavery is greatest, while maintaining proportionate oversight across our broader operations and supply chain.



5 Our Approach to Managing Modern Slavery Risks

EGB manages modern slavery risks through its Business Management System (BMS), where governance, procurement, supplier management and risk management operate as an integrated framework rather than separate compliance activities. Certified to **ISO 9001 (Quality), ISO 14001 (Environmental Management)** and **ISO 45001 (Occupational Health and Safety)**, our BMS provides a structured governance framework that supports ethical procurement, responsible business practices and continual improvement.

Modern slavery considerations are embedded throughout our procurement lifecycle through documented policies and procedures, supplier prequalification, contractual requirements, workforce awareness, reporting mechanisms and management review. This ensures modern slavery risks are identified, assessed and managed consistently across the business.

Recognising that the greatest potential exposure exists within complex upstream supply chains, EGB applies proportionate due diligence based on the type of goods or services procured, country of origin, supply chain complexity and our ability to influence supplier outcomes. This risk-based approach enables EGB to focus resources where they are likely to have the greatest impact while continually strengthening supplier engagement and supply chain transparency.



EGB is committed to preventing modern slavery and upholding human rights across our supply chain. Through strong governance, responsible procurement, workforce engagement and continuous improvement, we are working to build ethical, transparent and responsible practices.

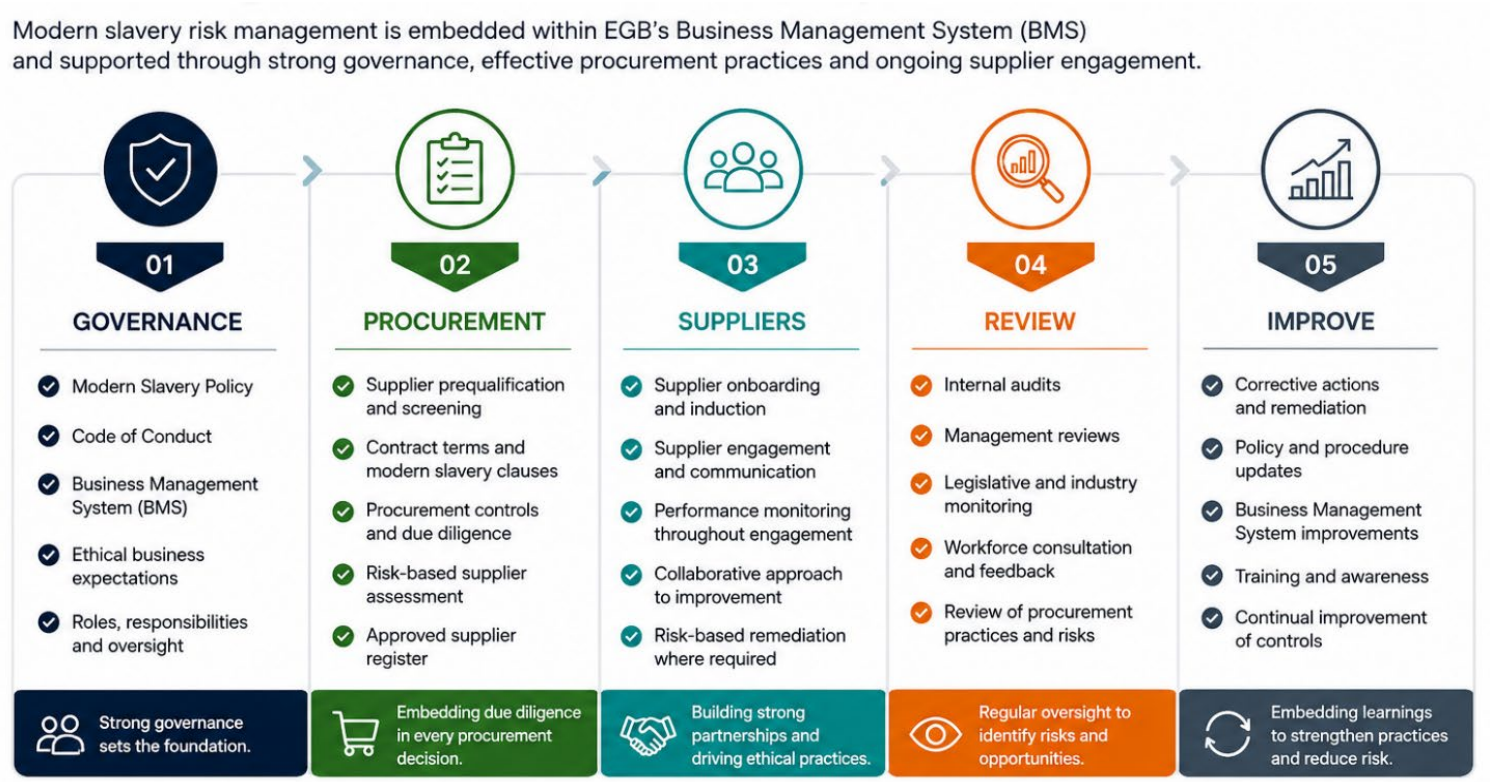
6 Monitor, Review & Continuous Improvement

EGB recognises that effective modern slavery risk management requires ongoing monitoring, supplier engagement and continual improvement. Rather than relying on a one-off assessment, modern slavery considerations are integrated into our Business Management System (BMS), procurement processes and supplier management framework to support ongoing oversight across our operations and supply chain.

Modern slavery expectations are communicated through our policies, procurement procedures, supplier prequalification and contractor onboarding processes. These processes are designed to provide appropriate visibility over supplier governance, workplace practices and legislative compliance, enabling EGB to identify procurement relationships that may present a greater inherent risk and apply proportionate due diligence where required.

Supplier performance is monitored throughout the lifecycle of each engagement through procurement reviews, project delivery, ongoing communication and performance monitoring. Where opportunities for improvement are identified, EGB seeks to work collaboratively with suppliers and subcontractors to improve transparency, strengthen ethical business practices and implement appropriate corrective actions. Where serious or persistent non-compliance is identified, EGB may apply enhanced monitoring, require remediation or reconsider the supplier's ongoing approval.

Modern slavery risks are also considered through internal audits, legislative reviews, workforce consultation and management review processes. Lessons learned are incorporated into our Business Management System to strengthen governance, improve procurement practices and support continual improvement across the organisation.



EGB's due diligence extends beyond procurement. We embed ethical governance, responsible procurement, workforce awareness and supplier engagement into our day-to-day operations to support the prevention, identification and reporting of modern slavery risks.

7 Approval & Declaration

This Modern Slavery Statement has been prepared in accordance with the requirements of the **Modern Slavery Act 2018 (Cth)**.

The Statement was approved by the Board of Directors of **Excell Gray Bruni Pty Ltd**, the principal governing body of the reporting entity, on **Wednesday 12th August, 2026**.

The Board of Directors is responsible for overseeing EGB's approach to identifying, assessing and addressing modern slavery risks across its operations and supply chain. The Board reviews this Statement annually and is committed to continually strengthening EGB's governance framework and due diligence processes.

This Statement is signed on behalf of the Board by:

Neville Smith
Managing Director
Excell Gray Bruni Pty Ltd

Signature: 

Date: 12/08/2026

Geoff Hayes
Director
Excell Gray Bruni Pty Ltd

Signature: 

Date: 12/08/2026

Justin Porganyi
Director
Excell Gray Bruni Pty Ltd

Signature: 

Date: 12/08/2026