

HUMAN RIGHTS & MODERN SLAVERY - POLICY & STATEMENT

This Policy and Statement is made under the *Modern Slavery Act 2018 (Cth)* by WBHO Australia Pty Ltd on behalf of itself and its related entities. The primary operating entities in Australia are Probuild Constructions (Aust) Pty Ltd, PCA (QLD) Pty Ltd, Monaco Hickey Pty Ltd and WBHO Infrastructure Pty Ltd.

WBHO Australia Pty Ltd as the principal government body of Probuild Constructions (Aust) Pty Ltd, PCA (QLD) Pty Ltd, Monaco Hickey Pty Ltd and WBHO Infrastructure Pty Ltd (**Probuild Group/Group**), does not condone modern slavery in any of our business dealings. The Group is committed to conduct its business and all its relationships based on integrity and to protect and uphold fundamental human rights in all of its undertakings.

Modern slavery is a crime and exploitation of fundamental human rights where victims can't refuse or leave. It takes various forms, including:

- slavery, servitude (coercing someone to provide services) and forced and compulsory labour;
- human trafficking (arranging or facilitating the travel or movement of a victim with a view to them being exploited);
- committing any offence with the intention to commit human trafficking;
- debt bondage, child labour, forced marriage and deceptive recruitment;
- aiding, abetting, counselling or procuring any of the above offences,

all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

To this end, we will:

- comply with the requirements of the Act
- respect diverse cultures and not tolerate harassment or discrimination
- respect that all people have a right to reasonable work conditions.

Our activities will be guided by:

- The International Bill of Rights (including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights); and
- The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work (which contains the eight core conventions of the ILO, including freedom of association and forced labour convention).

— Industry programmes, including SA8000

Policy Commitment.

This Policy applies to all directors, officers, employees and business partners, including joint venture partners, consultants, subcontractors and suppliers of the Group. This Policy should also be read in conjunction with the Probuild Group's Code of Conduct, which serves as a guide for how to conduct yourself as a member of the Probuild team.

To ensure commitment to the Policy, the Probuild Group has implemented measures designed to prevent and detect modern slavery within its business and supply chain, including:

- a policy which articulates the Probuild Group's commitment to prevent violations of the Act, within its operations and supply chain, being this Policy;
- communication of this Policy and all relevant elements of the program to all employees throughout the Group and to our business partners;
- the assessment of modern slavery and human trafficking risks within the Probuild Group and its supply chain and the development of effective, efficient and transparent controls to reduce and eliminate exposure to those risks;
- the adoption of compliance wording contracts;
- the adoption of appropriate due diligence and risk management processes on business partners, including joint venture partners, consultants, subcontractors and suppliers, coupled with a requirement that they implement procedures which incorporate the principles of the Act
- training of all relevant individuals throughout the company so that compliance with its policies and procedures is the duty of all relevant employees at all levels to ensure that individuals can recognise modern slavery practices and take steps to avoid the same.

Probuild is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery and human trafficking throughout its supply chains, consistent with its disclosure obligations under the Act, including the Modern Slavery Statement.

[Modern Slavery Statement](#)

About the Probuild Group

The Probuild Group is a tier one national builder. The Group is recognised for its experienced delivery teams, innovative construction and civil strategies and

efficient delivery. Founded in Victoria, it has offices in Melbourne, Sydney, Perth and Brisbane.

In Australia, the business operates under a board comprised of the Australian Executive Group. This consists of the Managing Director of Australia, State Managing Directors, the CFO and relevant executive directors of safety, people and culture and legal.

Since it was founded in 1987, the Probuild Group has focused on delivering commercial, civil and residential projects safely, within budget and programme expectations for its clients. In doing this, the Probuild Group recognises the importance of protecting human rights and is committed to protecting the rights of all people, including employees, those within its supply chain, and the communities in which it operates.

Potential Modern Slavery Risks

One of the potential risks facing the Probuild Group is the existence of modern slavery in its supply chain. This is reflected by the fact that the Probuild Group has a global supply chain. Through the Probuild Group's due diligence and risk assessment practices, the Group ensures that it and its business partners (including joint ventures, consultants, subcontractors and suppliers) are not involved in modern slavery.

One of the Probuild Group's key focus areas in our Environmental Sustainability and Governance FY 2021 Strategy is to play a lead role in modern slavery prevention. In doing this we will establish a due diligence and audit tool at all levels of our supply chain and roll out the audit tool to our supply chain for their implementation. We are also establishing a focus group to collaborate and promote modern slavery within the industry.

Modern Slavery Due Diligence and Risk Assessment

The Probuild Group provides safe and fair working conditions for all its employees in accordance with applicable awards and the fair work legislation.

The Probuild Group has policies which embed the importance of the right to expect to be able to work in a place that is inclusive, respectful and fair. The Group strives to create a work environment which is inclusive of all people regardless of gender, age, race, disability, sexual orientation, cultural background, religion, family responsibilities or other areas of potential difference. We expect the same standards from all our subcontractors, suppliers and other business partners.

Pre-assessment tools

Prior to the engagement of any of our subcontractors or suppliers, we require the completion of a modern slavery questionnaire to confirm they have practices in place, within their business, to ensure the prevention of modern slavery. This questionnaire acts as a risk assessment tool for subcontractors and suppliers prior to contract award. A subcontractor/supplier will only be engaged if it has passed this comprehensive risk assessment.

Contractual & Statutory Declaration Compliance

Through contractual arrangements and procurement principles, the Group's subcontractors and suppliers are required to comply with the Group's Code of Conduct and Modern Slavery Policy. Additionally, we require our subcontractors and suppliers to sign a statutory declaration (or equivalent) confirming that they have not engaged in modern slavery acts, representing an additional commitment to work with the Group.

On-site Audits

Additionally, where we are directly engaging international suppliers, we ensure we visit the suppliers' overseas factories at regular intervals to meet due diligence requirements. As a socially responsible corporation, the Group's role, put simply, is to ascertain where modern slavery exists, find it, then stop it.

In addition to above we have also engaged a permanent Probuild employee who resides in China and monitors all factories where Probuild has a direct supply arrangement on a regular basis.

Please note that due to the COVID-19 pandemic, our standard due diligence process as detailed above is being impacted due to the inability to visit factories and manufacturing plants where we do not directly engage a permanent resident to oversee this function.

Training

The Group undertakes annual training for all employees on the Code of Conduct and relevant policies. This training is undertaken nationally and provides comprehensive modules and test questions. The Group included an additional module to cover Modern Slavery to remind its employees about how important this issue is and that all employees are required to be a part of the Group's due diligence process in calling out breaches of ethics or modern slavery concerns.

Assessing & Reporting

The Group has a number of mechanisms for employees and third parties to anonymously report suspected or actual illegal activity or breaches of Company Policies, including its Code of Conduct and Modern Slavery Policy. Employees and third parties are able to utilise the Group's Whistleblower Policy to ensure protected disclosure, this can be done by phone or email. Each Whistleblower

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disclosure received is investigated in accordance with the Group’s investigation policies.

In order to assess grievances, the Group measures the number of people who use Probuild’s grievance mechanisms and the nature of their grievance, including its employee assistance programme. The Group also regularly engages with our stakeholders to understand their expectations about our performance.

The Probuild Group is committed to continuous improvement and recognises it is on a journey to improve modern slavery risk identification and mitigation. We continue to track and publicly report on progress annually in our Board Reports.

This statement applies to all companies wholly owned by WBHO Australia including Probuild Construction (Aust) Pty Ltd, Monaco Hickey Pty Ltd and WBHO Infrastructure Pty Ltd.

This statement was approved by the board of WBHO Australia Pty Ltd in their capacity as principal governing body of Probuild Constructions (Aust) Pty Ltd, Monaco Hickey Pty Ltd and WBHO Infrastructure on 27 October 2020.



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LUKE STAMBOLIS, Director, WBHO Australia Pty Ltd

27 October 2020