

Georgiou Group Pty Ltd

Modern Slavery Statement

2025



Contents

1 Reporting Entity	4
1.1 Structure	4
1.2 Operations	4
1.3 Supply Chains	6
2 Risks of Modern Slavery Practices	8
3 Actions to Assess and Address Risks	10
4 Measuring Effectiveness of Our Actions	13
5 Consultation and Future Commitments	15

The best people to work with.

Our brand is a result of our Georgiou Way culture. We never compromise on safety or reputation. We pride ourselves on securing repeat work with our clients and consultants. The Georgiou Way is the collection of our values which guide the success of our business. They are our beliefs and the way we do business- including how we manage risks and engage with our stakeholders and each other.

To be *'the best people to work with'*.

This is the Georgiou Group Pty Ltd.'s (Georgiou) statement pursuant to the Modern Slavery Act 2018 following Georgiou's review of its supply chains and operations in compliance with reporting obligations under the Act for the year ending 31 December 2025.



1 Reporting Entity

This Statement has been prepared and submitted under section 13 of the Modern Slavery Act 2018 (Cth) as a joint statement made by Georgiou Group Pty Ltd and STRABAG Australia Pty Ltd, collectively referred to as '**Georgiou**'.

This Statement will detail the strategies in place within these entities and their subsidiaries to continue the identification and prevention of any potential modern slavery activities within its organisation.

Georgiou has continued our commitment to identifying and mitigating any risks associated with modern slavery practices in our supply chains and operations. We continue meeting our goal of sustainable growth through responsible business practices and require the same of our subcontractors and suppliers through our network of partners delivering our projects throughout Western Australia, Queensland, New South Wales, and the Northern Territory.

1.1 Structure

Georgiou Group Pty Ltd (Georgiou) is a privately owned and operated entity limited by shares, incorporated and domiciled in Australia. Georgiou is owned by STRABAG Australia Pty Ltd who in turn is owned by STRABAG Societas Europea, one of Europe's leading construction technology groups based in Vienna, Austria. Georgiou is domiciled and operates solely within Australia, with its registered office in Perth, Western Australia.

Georgiou is a multi-disciplinary building and civil contractor across Western Australia, Queensland, New South Wales and the Northern Territory. Our portfolio spans **transport infrastructure, urban development, resources sector projects, defence facilities, health and education buildings, residential and commercial developments**, among others. Approximately 73% of work-in-hand by value is with Australian government (state or local) clients, and 27% with private sector clients. We also participate in joint ventures and alliances with other reputable contractors on major infrastructure projects (e.g. road and rail alliances) within Australia.

In joining the STRABAG Group, Georgiou benefits from being part of a large, sophisticated organisation with access to proven technical capability and expertise that both complements and extends Georgiou's existing capabilities.

Georgiou has maintained its path of sustainable growth over the reporting period, and at the end of the reporting period Georgiou had approximately 860 directly engaged employees, with 91% of those engaged on a permanent basis.

1.2 Operations

Georgiou commenced its operations in 1977 as Direct Drainage, expanding in 1993 to start a precast company called Geocrete, and further in 1994 with the acquisition of Roadpave. In 1996, the three companies merged to become Georgiou Group. Today, we are a national civil and building construction company with offices in Perth, Darwin, Gold Coast, Brisbane and

Sydney, providing a diverse range of civil and building construction services to government and private clients across Australia.

In March 2025, we saw the completion of the acquisition of Georgiou Group by the STRABAG Group. STRABAG has 86,000 employees globally and delivers services along the entire construction value chain including design and planning, construction, property and facility services and operations and demolition, making them one of Europe's largest construction companies.

While Georgiou's operations are limited to Australia, we understand the inherent risks of modern slavery practices that can arise in the construction industry through its supply chain and local operations with exploited workforces. We are committed to minimising negative impacts on the communities and environments in which we work and being a good corporate citizen.

All but one of our executed head contract works through the reporting period have been undertaken with clients who are domiciled and based in Australia. Georgiou is also engaged on a number of joint ventures with other Tier 1 and Tier 2 contractors within Australia and is an alliance partner on several infrastructure projects with State Government clients.

Georgiou had 860 direct employees at the end of the reporting period, comprising of 683 salaried and 177 wages employees.

Some of our key projects during the reporting period included:

Alkimos to Wanneroo Desalination Pipeline (WA) – an alliance with the Water Corporation and DM Drainage and Construction, the project will deliver 27.5km's of the total 33.5kms Alkimos to Wanneroo Desalination Project in Western Australia. The project includes the design, construction and commissioning of the 1.6 metre diameter, WA manufactured below ground water pipeline. Once complete, the pipeline will transfer drinking water produced by the future Alkimos Seawater Desalination Plant to Wanneroo Reservoir to be combined with Perth's Integrated Water Supply Scheme.

Hope Island Station (QLD) – in joint venture with Acciona, Georgiou is delivering the Hope Island Station project for the Cross River Rail Delivery Authority in QLD. Located in Hope Island, the Station is one of three new stations on Queensland's Gold Coast being delivered as part of Cross River Rail's New Gold Coast Stations Program. The project scope includes station facilities (including station buildings, ticketing gates and passenger information services), station elements including elevators, stairs and plaza canopy, new signalised intersection upgrade and car park and public transport infrastructure and interfaces.

Newell Highway Upgrade- Parkes Bypass (NSW) – the project involves relocating the regional highway by 2km's west with the construction of a new 10.5km bypass for repeat client, Transport for New South Wales. The scope of the project includes T-intersections where the new bypass connects to existing highway, a four-way roundabout, a new bridge and shared pedestrian/cycleway bridge over the bypass.

1.3 Supply Chains

Georgiou remains committed to working within our own business and supply chain to ensure a proactive approach to tackling modern slavery risks and practices and mitigating these in our wider supply chain. We seek to work collaboratively with our supply chain to eradicate these practices and ensure compliance with applicable legislative and regulatory requirements, as well as actively driving our Georgiou values of Care, Integrity and Excellence.

The following metrics summarise key aspects of our workforce, supplier base, and governance outcomes for 2025:

Employees	Suppliers	Domestic Spend	Incidents Reported
860 Direct employees in Australia (91% permanent)	2,991 Direct suppliers engaged (≈98% based in Australia)	99% Proportion of total supplier spend within Australia	0 Modern slavery breaches reported via whistle-blower hotline in 2025

In the 2025 reporting period, Georgiou worked with 2,991 direct suppliers and subcontractors, with the vast majority of these being based in Australia once again. This reflects our ongoing commitment to sourcing goods and services domestically whenever feasible, which not only supports local economies but also gives us greater oversight of labour conditions. We do not manufacture products ourselves; instead, we rely on suppliers for materials, equipment, and specialised services. Key categories of procurement include:

- **Construction materials** – e.g. concrete, aggregates, steel, asphalt
- **Plant and equipment** – e.g. heavy machinery, vehicles, prefabricated building components
- **Specialist building products** – e.g. elevators, façade systems, electrical and mechanical fixtures
- **Subcontracted services** – e.g. civil works contractors, formwork/reinforcement (FRP) specialists, electricians, plumbers, and other trades
- **Labour hire** – temporary staffing providers for construction labour
- **Professional and support services** – e.g. design engineering consultants, surveyors, insurance, IT and communications, and other professional services.

While most of our suppliers are Australian, we acknowledge that some of their supply chains may extend overseas. During this reporting period, Georgiou directly engaged only two overseas suppliers, constituting about 0.1% of total spend. These were primarily for outsourced back-office services in the Philippines and bespoke formwork from China for a construction project. In all such cases, we conduct enhanced due diligence (described below) and ensure our contracts require compliance with local labour laws and standards. For example, our Philippines-based support contractor is contractually obliged to meet or exceed

local employment standards, and we periodically review their labour arrangements (e.g. wages and conditions) to confirm compliance.

Overall, our supply chain remains almost exclusively Australian, which significantly reduces exposure to certain high-risk geographies for modern slavery. However, we recognise that complex global supply chains for some inputs (like raw materials or electronic components in equipment) can still pose risks further upstream, beyond our direct suppliers. The following sections outline these modern slavery risks and the actions we are taking in response.



Breakfast Creek Bridge Project, QLD

2 Risks of Modern Slavery Practices

Georgiou undertakes a risk-based assessment of our operations and supply chains to identify potential modern slavery vulnerabilities. In evaluating risk, we consider:

- (a) the geographical origin of materials and services (certain regions have higher prevalence of forced labour),
- (b) the nature of the workforce involved (roles filled by low-skilled, migrant, or otherwise vulnerable workers may be at higher risk of exploitation), and
- (c) industry/category risk factors (products or services known to have modern slavery issues globally).

Australia, where our operations and most direct procurement occur, has one of the lowest estimated prevalence of modern slavery in the Asia-Pacific and a strong regulatory framework to protect workers. These conditions, along with our internal controls, mean the risk of modern slavery **within Georgiou’s direct business operations is assessed as low**. We have zero tolerance for any form of modern slavery and have not identified any instances of it in our workforce. Nonetheless, we remain alert to any indirect risks, especially in our supply chain where deeper tiers may be outside Australia’s regulatory reach.

Key Risk Areas in Supply Chain: In the construction industry, certain procurement categories are known to carry elevated modern slavery risks, often linked to global supply chains. Georgiou has identified the following key risk areas relevant to our supply chain:

Risk Area	Modern Slavery Vulnerability
Raw materials & commodities (e.g. steel, cement, aggregates)	Potential use of forced or bonded labour in upstream production and mining processes, often in regions with lax labour laws or low wages.
Labour-intensive services (e.g. labour hire, cleaning, security)	Reliance on low-skilled, often migrant workers who may be exploited by unscrupulous labour hire contractors (underpayment, excessive hours, etc.).
Manufactured components (e.g. electronics, plant equipment)	Parts and equipment are frequently manufactured in countries with higher modern slavery risks (especially electronics supply chains in Asia), implicating forced labour or poor working conditions in factories.

These areas require ongoing vigilance, even when we source from Australian distributors, because the risk may be hidden further down the chain (for example, an Australian supplier of structural steel may itself import from overseas mills). We understand that modern slavery most often occurs in the lower tiers of supply chains, where visibility is limited. Additionally, the construction sector as a whole is recognised internationally as a high-risk industry for forced labour. Even in Australia, segments like contract cleaning, site security, and outsourced labour are known to have exploitation risks if not properly managed.

Mitigating Factors in Our Operations: Despite these risks, several factors mitigate Georgiou's exposure:

- All our on-site workers and employees operate under Australian jurisdiction, with strong legal protections and active enforcement of labour standards. This includes the use of assessed industrial agreements, modern awards and the National Employment Standards, operating alongside various State and Territory work health and safety regimes and Georgiou's own policies specific to Employee and Industrial Relations, Workplace Discrimination, Diversity and Equal Opportunity and a suite of Workplace Health and Safety policies. This greatly reduces the likelihood of modern slavery in our direct operations.
- Georgiou maintains rigorous internal controls and policies that safeguard workers' rights – e.g. verified wage payments under applicable Awards or enterprise agreements, prohibition of any forced or child labour in our Code of Conduct, and a culture of safety and accountability reinforced by programs like *Safety is My Way*.
- We use primarily established, reputable suppliers (many are large Australian companies or well-regulated SMEs). Our analysis shows the top ten suppliers account for ~27% of our spend, and most of them are known companies with their own robust compliance programs. This concentration allows us to focus due diligence on major partners.
- For higher-risk procurement categories (as identified above), we have implemented specific risk mitigation actions, detailed in the next section, including deep due diligence for any offshore sourcing and strict contractual requirements for all suppliers.

By combining these measures, Georgiou strives to ensure any risk of modern slavery in our operations or immediate supply chain is identified and addressed promptly. We remain aware, however, that no company is immune to these risks, and therefore continuous improvement of our risk management approach is essential.

3 Actions to Assess and Address Risks

Georgiou has a comprehensive strategy to prevent, detect, and address modern slavery risks in our business. During the reporting period, we continued to strengthen our systems and processes, building on the foundations laid in prior years. Our approach includes robust due diligence in procurement, enhancements to policies and contracts, training and awareness programs, and mechanisms for reporting and remediation. Key actions taken in this reporting period include:

Action/Initiative	Details and Purpose
Supplier Prequalification	<p>The continued roll out of our enhanced vendor pre-contract assessment questionnaire to explicitly screen for modern slavery risk. All new suppliers must disclose how they assess and mitigate modern slavery in their operations and supply chains. This due diligence is repeated every 3 years for existing key vendors to ensure ongoing compliance.</p>
Updated Contract Clauses	<p>An updated suite of standard subcontract and supply agreements aligned with the Modern Slavery Act was embedded. Contracts now include warranties that suppliers will comply with the Act at all times, and impose positive obligations (subject to audit) such as:</p> <ul style="list-style-type: none"> • Ensuring their own subcontractors and suppliers comply with modern slavery laws. • Taking all reasonable steps to identify and eliminate modern slavery in their operations/supply chain. • Providing information and assistance to Georgiou for our reporting and compliance needs. • Immediate notification to Georgiou if they become aware of any modern slavery occurrence. <p>These contractual terms help extend our zero-tolerance policy deep into the supply chain and enable remediation if an issue is identified.</p>
Overseas Vendor Due Diligence	<p>Implemented an extended due diligence process for any overseas-based suppliers. In addition to regular prequalification, foreign vendors must complete a detailed Modern Slavery Questionnaire covering their ownership, labour practices, supply chain tracing, training, and incident response processes. Our procurement team reviews and risk-assesses these responses before engagement. This ensures we only deal with offshore partners who demonstrate strong commitment to ethical labour standards.</p>
High-Risk Supplier Review	<p>Conducted targeted reviews of suppliers deemed high-risk or high-value. We annually identify key vendors (including those operating overseas or in high-risk industries) and evaluate their modern slavery</p>

governance – such as checking for their own modern slavery statements or policies and understanding their supply chains. In this period, for example, we verified that our limited overseas partners had appropriate policies and labour conditions (e.g. the Philippine support services provider’s Modern Slavery Policy and labour practices were reviewed and found satisfactory). Any red flags would trigger further action or reconsideration of the business relationship.

Supply Chain Mapping & Risk Analysis

Performed a spend analysis by vendor type to map out where potential risk concentrations lie. We categorized our entire supplier base (e.g. materials, plant hire, labour hire, professional services, etc.) and identified the proportion of spend in each category. This analysis helps us focus on categories which might warrant closer monitoring. It confirmed that the vast majority of our spending is in lower-risk categories (or with well-regulated suppliers), and that our risk management efforts are correctly focused on the few higher-risk areas.

Training & Awareness

Expanded our training programs to ensure staff understand modern slavery risks and our procedures. Our Commercial Acumen training suite continues to be delivered enterprise-wide, which includes modules on procurement due diligence and ethical sourcing requirements. This training is mandatory for all roles involved in procurement and contract management and includes refresher sessions. In addition, all managers and recruitment staff underwent unconscious bias training to promote fair hiring and management practices, reducing the risk of exploitation or unfair treatment of workers.

Responsible Recruitment Practices

Maintained rigorous recruitment and HR processes to prevent any forced labour or exploitation in our workforce. Georgiou’s HR team verifies work rights and IDs for all new hires and does not charge any fees to employees (practices that can be precursors to debt bondage). Our induction program for new employees includes training on Georgiou’s Code of Conduct and whistle-blower mechanisms, so all staff are aware of expected standards and how to report concerns. For any labour hire agencies we use, we conduct annual due diligence audits to ensure they pay workers correctly (according to Australian Awards/agreements) and uphold fair conditions. We only engage labour hire firms that meet all our checks, and this is reassessed each year before renewing any labour hire agreements.

Diversity & Inclusion Initiatives

Continued to drive our Diversity and Inclusion program, which, while not solely aimed at modern slavery, fosters a workplace culture of respect and fairness. In 2025, our Diversity Committee (supported by new “Diversity Champions”) led initiatives such as internal and external pay equity audits, improved diversity reporting to leadership, and enhancements to flexible work arrangements. We also offer

progressive parental leave policies for all genders. These efforts help reduce vulnerabilities (e.g. by ensuring no group of employees is marginalized or underpaid) and reinforce Georgiou's commitment to ethical employment practices. We also annually attain third-party certification of our gender pay equity compliance (WGEA Certificate of Compliance).

Governance and Policies

Ensured that our governance framework continues to support anti-slavery efforts. Oversight is provided by our Board and Executive Leadership (including our Chief Risk Officer and National People & Capability Manager). We regularly review relevant corporate policies. For instance, our *Workplace Discrimination Policy* explicitly forbids the use of forced, bonded, or child labour in any Georgiou operations. Our *Code of Conduct* binds not only employees but also contractors and suppliers to uphold ethical standards, and this code addresses human rights, bribery, and transparency. We also have a *Sustainability Policy* that commits us to managing social impacts responsibly. These policies are communicated to all staff and key partners, setting clear expectations that help prevent modern slavery indirectly (by promoting an overall culture of ethics and compliance).

Whistle-blower Hotline

Promoted the continued use of Georgiou's independent whistle-blower hotline (operated by Stopleveline) as a safe channel to report any unethical or unlawful conduct, including modern slavery concerns. The hotline is available 24/7 and allows anonymous reporting via phone, email, or online. We remind employees, subcontractors, and suppliers about this mechanism. During the reporting year, there were no reports to the whistle-blower service relating to modern slavery (or other unlawful behaviour), but its availability is a critical part of our remediation framework – any credible report would be investigated and addressed promptly. We enforce a strict non-retaliation policy to protect whistle-blowers.

Through these actions, Georgiou has sought to embed respect for human rights across all facets of our business. Our due diligence processes enable us to identify risks early, our training and policies equip our people to respond appropriately, and our contractual and governance measures extend our standards to business partners. We remain ready to take remedial action if any instance of modern slavery is identified – this could include working with the supplier on corrective steps or terminating the relationship, and notifying authorities as required. To date, we have not needed to invoke such measures, as our preventative approach has been effective. However, we continuously improve our safeguards to ensure we stay ahead of emerging risks.

4 Measuring Effectiveness of Our Actions

Georgiou recognises the importance of assessing the effectiveness of the steps we are taking. We have established a framework of key performance indicators (KPIs) and review processes to track our progress and ensure our initiatives are yielding results. During this reporting period, we measured our effectiveness through the following:

Measure	Method & Outcome
Supplier Surveys	<p>We conduct an annual Modern Slavery survey of selected high-risk or high-value suppliers and subcontractors. This includes any suppliers beyond a certain spend threshold or those operating in higher-risk categories (or with overseas supply chains). The survey asks detailed questions regarding their own risk assessments and mitigation efforts. The results this year indicated that our key suppliers have appropriate measures in place, and no red flags were raised, validating the effectiveness of our due diligence focus on the right entities.</p>
Procurement Audits	<p>Internal audits of our procurement process were carried out, examining whether modern slavery risk assessments and questionnaire checks are being performed and documented for each new supplier. The audit confirmed a high rate of compliance with our procedure – any gaps identified were minor and promptly remedied (e.g. ensuring all required questionnaires were on file). This gives us confidence that our procurement due diligence system is functioning as intended.</p>
Contract Compliance	<p>We reviewed our standard contract templates and monitored their use to ensure all new significant subcontracts include the updated modern slavery clauses. Additionally, through project audits, we checked that contractors are meeting the ongoing obligations (e.g. providing requested information, no incidents to report). This measure helps verify that the contractual tools we deployed are effectively implemented and enforced.</p>
Whistle-blower Monitoring	<p>We continuously monitor the whistle-blower hotline reports. A key indicator of effectiveness is the number and nature of any reports related to labour exploitation. Zero reports of modern slavery issues were received this year, which may suggest that significant problems were not occurring or not observed. We treat the absence of reports cautiously – alongside other indicators – and ensure the hotline remains well-publicised. We also review how any complaints (if they arise) are handled to ensure our investigation and remediation processes work swiftly and fairly.</p>
Training Completion	<p>We track completion rates for the relevant training modules (Procurement & Commercial Acumen training and unconscious bias training). By year-end, all employees in the target roles had completed the required training, and refresher courses are on schedule. High completion rates indicate our workforce is knowledgeable about modern slavery risks and prepared to</p>

implement our policies. We correlate this with internal surveys that test awareness, finding strong understanding of protocols among staff, which we attribute to the training efforts.

In addition to the above, Georgiou benchmarks its practices against industry peers and seeks external feedback. For example, we review the guidance from the Australian Border Force and updates to the *Commonwealth Modern Slavery Act – Guidance for Reporting Entities* to ensure our approach remains aligned with best practices. We also consider any stakeholder input on our modern slavery program.

Overall, these effectiveness measures have indicated that our actions are making an impact. They have not uncovered any instances of modern slavery within our operations or Tier 1 supply chain. They also highlight areas for improvement – for instance, we identified through our supplier analysis that we can further engage with lower-tier suppliers (via our Tier 1 vendors) to extend our visibility. These insights will shape our focus for the next reporting period.

5 Consultation and Future Commitments

This statement is submitted as a joint statement between Georgiou Group Pty Ltd and STRABAG Australia Pty Ltd. Our few affiliated companies (such as Georgiou Australia Pty Ltd) are part of our integrated corporate structure and operate under the same policies and management oversight as described in this statement. The Georgiou leadership team (including executives overseeing risk, procurement, and human resources) has ensured that all parts of our business covered by this statement adhere to the commitments and processes outlined above. Internally, we have communicated this Modern Slavery Statement and the underlying policies across all departments and projects, reinforcing a group-wide understanding of our obligations. Key personnel from relevant functions were involved in preparing and reviewing the content of this statement to confirm its accuracy and completeness.

Looking forward, Georgiou is committed to continuous improvement in combatting modern slavery. In the next year, we plan to: expand our supplier engagement by providing feedback and guidance to suppliers who complete our modern slavery questionnaire (to help them improve their practices); leverage industry collaborations and forums to share best practices and stay updated on emerging risks; and refine our internal KPIs to include more granular metrics (for example, tracking how many suppliers implement corrective actions based on our audits or surveys). We will also stay vigilant for any changes in our risk profile, such as entering new markets or sourcing new materials, and will adjust our due diligence accordingly. These forward-looking actions, supported by the Board and executive leadership, demonstrate Georgiou's ongoing commitment to being part of the solution to eradicate modern slavery in our industry

This Modern Slavery Statement was approved by the Board of Directors of Georgiou Group Pty Ltd and STRABAG Australia Pty Ltd prior to its submission. It is signed below by the Chief Executive Officer as the authorised representative of Georgiou.

DocuSigned by:

CE3272E130DC4A8...

Gary Georgiou

Chief Executive Officer