

PROJEX[®]

Build Better.

MODERN SLAVERY STATEMENT
FY 2023/2024

This is the Modern Slavery Statement of Projex Building Group Pty Ltd and its related entities within Australia.

At Projex we build better construction, refurbishment and fit-out projects for private and government clients. We deliver across a broad range of industry sectors and project types, including offices, healthcare, education, retail, industrial, residential and speciality works.

We are committed to the human rights of our workforce and those that work with us in our supply chain.

The requirements under the Modern Slavery Act, 2018 (Cth) (the **Act**) call for reporting on 7 mandatory areas, and set out are the following statements:

1. Reporting Entities

This statement is made under the Act by Projex Building Group Pty Ltd on behalf of itself and its related entities in Australia being, Projex Building Residential Pty Ltd, EP Kingston Pty Ltd and Ragnar Projex Pty Ltd.

2. The Structure, Operations and Supply Chains

Projex operates in Canberra ACT and the surrounding areas. Projex has 57 employees over Projex Building Group Pty Ltd and Projex Building Residential Pty Ltd. Projex Building Group Pty Ltd is the major shareholder of Projex Building Residential Pty Ltd.

With a wealth of construction and highly technical experience, our leadership team actively oversees every project to ensure that our highest standards are maintained. Through a highly collaborative approach with our clients, stakeholders, consultants, and our network of reliable subcontractors and suppliers, we're able to draw on industry-leading skills and knowledge, to deliver the best possible results.

Projex operates on a subcontract model, whereby Projex manages a subcontractor and supplier workforce. We have a wide range of subcontractors and suppliers who are involved in the projects from demolition, excavation through to fit-out and new build.

Projex supply chain has a mix of local Canberra subcontractors and suppliers with some Australia-Wide subcontractors and suppliers. All entities that Projex engages are Australian registered entities, who may use supply chains overseas. A good example of overseas procurement is in respect to the manufacturing of vertical transportation which often occurs in China.

3. The risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls

Projex operates its business within the development and construction sector which has been recognised as facing an elevated risk of modern slavery within its operations and supply chains as a result of factors such as:

- High demand for a lower-skilled labour force who are at higher risk of exploitation;
- Low or poor visibility over long and complex supply chains;
- Lower-tier suppliers conducting business in high-risk geographies;
- Tight project deadlines and seasonality of work;
- Materials and supplies sourced from countries that are regarded as having difficult human rights environments;
- Products that are manufactured by low skilled and low paid workforces; and
- Have workforces who may be on labour hire / day rates.

Projex continue to work with our subcontractors and suppliers throughout the procurement process to help educate and assist them in managing the risks they have downstream.

With regards to Projex employees, we assess the risk of modern slavery within our business entity as low due to the following:

- Comprehensive onboarding process; and
- Thorough annual salary and performance reviews;

4. The actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes

At Projex, we maintain policies and procedures that set out our minimum requirements and promote ethical behaviour and social responsibility. These policies and procedures are regularly reviewed and amended to ensure we continue to develop and improve. Projex has developed a specific modern slavery policy which outlines the following framework:

- Purpose and commitment to continuous improvement;
- Acknowledgement and stance on modern slavery;
- Compliance and responsibility;
- Risk assessment;
- Supply chain due diligence;
- Training and awareness;
- Reporting; and
- Continuous improvement.

We conduct health and safety audits on our projects. Our due diligence procedures allow us to check and monitor the working conditions of construction workers on our sites and elsewhere in our supply chain to identify any unsafe conditions.

5. How the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks

Projex uses the following tools to monitor the effectiveness of the processes and procedures to address the modern slavery risks that occurs within the construction sector including:

- Undertake an annual senior management review of Projex response to modern slavery;
- Conduct internal audits on Projex prequalification checks for subcontractors and suppliers; and
- Work closely with key subcontractors and suppliers to check and monitor how they are progressing and performing on actions implemented to address modern slavery risks.

Based on the results of these processes and procedures, Projex will strengthen and continually develop our actions to improve our reply as an organisation to modern slavery practices.

6. The process of consultation with entities owned or controlled by Projex Building Group Pty Ltd

The Directors of Projex Building Group Pty Ltd and Projex Building Residential Pty Ltd and related entities have reviewed and approved this statement on behalf of Projex and the entities named in paragraph 1.

7. Other relevant info

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

This statement has been approved by all Directors of Projex Building Group Pty Ltd and Projex Building Residential Pty Ltd and has been signed by John Glass as Managing Director of Projex Building Group Pty Ltd.

This statement for the 2023–2024 financial year is published pursuant to section 14 of the Act and was finalised with each reporting entity.



John Glass
Managing Director
Projex Building Group Pty Ltd
Dated: 17 December 2024

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