# MODERN SLAVERY STATEMENT FY2020

# MADE BY MULTIPLEX CONSTRUCTIONS PTY LIMITED AND ITS RELATED ENTITIES WITHIN AUSTRALIA

# **MODERN SLAVERY ACT, 2018 (CTH) (THE "ACT")**

This is the Modern Slavery Statement of Multiplex Constructions Pty Limited, the Australian arm of the Multiplex global construction company that has been in existence since 1962.

The requirements under the Act call for reporting on 7 mandatory areas, and set out below are the following statements:

#### 1. **Reporting Entity**

This Statement is made under the Act by Multiplex Constructions Pty Limited on behalf of itself and its related entities.

The primary operating entities in Australia are Multiplex Constructions Pty Limited and Multiplex Constructions Qld Ptv Limited.

#### 2. The Structure, operations and supply chains of the entity

Multiplex operates on a global level, with operations in Australia, Europe, the Middle East, Canada and India.

In Australia the business operates under a board comprised of the Australian Executive Group. This consists of the CEO, the Regional Managing Directors of each of our regions in Australia, the CFO and the Executive Directors of Safety, Operations, People and Legal.

Work in all States other than Queensland is undertaken by Multiplex Constructions Pty Limited. In Queensland, due to very specific legislation, the construction work is undertaken by Multiplex Construction Qld Pty Limited.

Each project undertaken in Australia has a standalone project delivery team who manage the project, design and construction of a range of projects. The buildings we construct cover a range of sectors, including commercial, residential, hospitals, and universities. They can be relatively straightforward to iconic. We have completed Stadia, museums, law courts and are currently undertaking the new airport for Western Sydney.

Multiplex operates on a subcontract model, whereby Multiplex 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 projects from excavation through to fit out and commissioning.

The supply chain has a mix of Australian subcontractors and some limited international subcontractors for specialist trades - such as Cross laminated Timber (Suppliers in Dolomites, Italy). The entities that Multiplex engages with are primarily Australian registered entities, who may use supply chains overseas. A good example of that is façade contractors who manufacture typically in China.

### 3. The risk of Modern slavery in the operations and supply chains of the reporting entity and any entities it owns or controls

Multiplex operates in an industry where a large number of the subcontractors will source materials and supplies that:

- Are from countries that are regarded as having difficult human rights environments;
- Maybe products that are manufactured by low skilled and low paid workforces;
- Have workforces who may be on labour hire/day rates; and
- Are priced in highly competitive tendered markets.

Multiplex engages with its subcontractors and suppliers to make sure that they acknowledge and understand the importance of complying with Multiplex' ethical requirements.

Multiplex understands that Covid19 may have had a more significant impact on workforces and supply chains located in vulnerable geographies.

### 4. The actions taken by the reporting entity to assess and address the risks including Due Diligence and remediation

# Policies/procedures:

At Multiplex, 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 (where required) to ensure we develop and improve. These policies and procedures include:

- Anti-Modern Slavery Policy
- Code of Business Conduct and Ethics
- Anti-Bribery and Corruption Policy
- Anti-Modern Slavery and Human Trafficking Charter for Suppliers and Service Providers, which sets out requirements for our suppliers and service providers
- Operation of a toll-free reporting Ethic hotline
- Implementation of high standards of Health and Safety in the workplace for all employees and construction workers on our sites

### **Impact of Covid19:**

Currently the Covid Pandemic is having an impact on how our standard due diligence is undertaken, but our usual process is to ensure that we do actual visits to factories and manufacturing plants located both in Australia and internationally. These regular visits are part of the way we meet our due diligence requirements.

In 2019 for instance we undertook many overseas trips to meet with our suppliers based overseas. Our teams visited China over 60 times, Italy 10 times and also trips to facilities and manufacturing plants in other global locations. Our aim is to train our staff so that they can ask appropriate questions in respect of Modern Slavery and to report concerns they might have.

## Contractual documentation and audits:

Multiplex makes sure that our contractual documentation and the process we use for preapproving members of the supply chain has appropriate questioning on modern slavery. As part of the tendering process all subcontractors and suppliers and consultants are required to acknowledge the Multiplex Anti-Modern Slavery Policy and have to advise that they have carried out due diligence on their own supply chain.

We conduct health and safety audits not only on our projects, but also on suppliers and subcontractors. 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. In 2020 this has not occurred for international suppliers.

## Training:

Multiplex undertakes annual training for all employees on the Code of Business Conduct and Ethics. This training is undertaken globally and has a requirement for an 80% pass rate on a number of test questions that occur following completion of the learning module.

In 2020, Multiplex 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 Multiplex due diligence process in calling out breaches of ethics or modern slavery concerns.

In addition Multiplex runs compulsory Code of Business Conduct and Ethics training for all new starters in the business together with an induction program that highlights safety, health and wellness.

All Multiplex employees in Australia, have written employment contracts and associated documents with easy access to Multiplex's policy and procedures, which are hosted on the internal intranet.

Multiplex requires compliance (through contractual agreements) with our policies and procedures relating to modern slavery and worker welfare from its own workforce, and all subcontractors, suppliers and recruitment agents. We continue to work with and assist our supply chain to implement their own equivalent policies, procedures and systems to identify and manage their own supply chain risks. Typically our relationships with the

supply chain are long term, and that is important and conducive to having good discussions and garnering feedback on tackling modern slavery and promoting ethical labour practices.

#### 5. How the effectiveness of such actions is assessed

Multiplex has a reporting hotline managed by an independent third-party. The Reporting Hotline allows anyone to call anonymously (if they so choose) to report suspected unethical, illegal or unsafe behaviour in English and other languages. The Reporting Hotline is available toll-free, 24 hours a day, 7 days a week.

Calls to the hotline are dealt with through a process that involves the independent third party and the Multiplex Internal Audit team. An important element of Multiplex's approach to managing Modern Slavery, is having an open culture that has a strong tone from the top approach by the Australian Executive Group and cascades through the business.

In 2020 the Multiplex Code of Business Conduct and Ethics training also contained a module on Whistleblowing and set out the details for raising matters under the relevant Whistleblowing legislation both in Australia and globally.

#### 6. The process of consultation with entities owned or controlled by Multiplex Constructions Ptv Limited.

The Australian Executive Group sits across the Multiplex entities that operate in Australia and this statement has been reviewed and approved by them on behalf of the Australian Multiplex business.

#### 7. Other relevant info

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

All Multiplex employees will undertake general training under the Code of Conduct in 2021.

This Statement has been approved by all Directors of Multiplex Constructions Pty Limited on 21 July 2021 and has been signed by John Flecker as a Director and Chief Executive Officer of Multiplex Constructions Pty Limited.

John Flecker

Chief Executive Officer

Multiplex Constructions Ptv Limited

Dated: 22 July 2021