

Annual Modern Slavery Statement

Introduction

GS Engineering & Construction Australia Pty Ltd (**GS E&C Australia**), a subsidiary of South Korean-based GS E&C, is an engineering, procurement and construction contractor with a wide range of expertise in infrastructure, power, renewable energy and architecture projects.

This Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**) and sets out the steps that GS E&C Australia has taken, and is continuing to take, to ensure that modern slavery is not taking place within our operations or supply chain. Modern slavery encompasses criminal offences relating to deprivation of civil liberties, human trafficking, forced marriage and child labour.

GS E&C Australia fully supports the aims of the Act and is committed to operating free from forced labour, slavery and human trafficking. We have a zero tolerance approach to all forms of modern slavery in our operations and supply chain.

As part of the GS E&C, sustainable practices are firmly anchored in our corporate culture based on our company values. We apply globally-binding principles that require employees and managers to behave in an ethical, law-abiding manner.

This Statement is made pursuant to section 13 of the Act in respect of the financial year ended 31st Dec 2025.

This Statement has been approved by GS E&C Australia Directors, being the principal governing body of the entity, and is structured in line with the mandatory criterion set out in the Act.

Our reporting entity

This annual modern slavery statement relates to GS Engineering and Construction Australia Pty Ltd (ACN 147 919 328).

Our organisation, operations and supply chains

GS E&C is privately owned and headquartered in Seoul, South Korea. We have our Australian head office in Melbourne, Victoria and a presence in Brisbane, Queensland. GS E&C Australia is a wholly owned subsidiary, whether directly or indirectly, of GS E&C (HQ) (South Korea).

Operations

GS E&C is a construction arm of south Korean based GS Group. The Group is the seventh-largest conglomerate in South Korea, which officially split from the LG Group in 2005. GS E&C

are a market leader, currently delivering more than 200 projects worldwide including Victoria's North East Link Project and Suburban Rail Loop Project.

While GS E&C is headquartered in South Korea, we have global presence and operations in:

- North America (USA and Canada), South America (Brazil)
- Asia (Vietnam, Singapore, Indonesia, India, Thailand, Philippines, Myanmar and Bangladesh)
- China, Kazakhstan,
- Europe (Poland, Italy, Spain and the United Kingdom)
- Africa/Middle East (Algeria, Bahrain, Tanzania, United Arab Emirates, Saudi Arabia, Oman, Kuwait and Qatar)

Our mission statement is, 'Dreaming about Tomorrow with Clients, Creating New Values for Them'. It represents our strong will to create new values for our stakeholders and fulfill our social responsibilities for a better tomorrow for all. Our Code of Conduct, moreover, emphasises the ethics of professionalism, being hands-on, speaking up and self-learning.

You can read more about our global business on our website [here](#) and our Australian business [here](#).

Supply Chain

Our supply chain is co-worked and managed between GS E&C Australia and the Procurement Division and the Corporate Sustainability Management Division (based in Seoul, South Korea).

GS E&C Australia sources its materials globally based on project need, the economic environment, established supply chain agreements and, importantly, alignment with our corporate values.

The goods and services that we procure from suppliers range from basic construction materials such as concrete and steel to sophisticated machinery such as drones, tunnel boring machines and AI robots, simultaneously comply with the policy of local content in terms of job creation and stimulation of local economy.

GS E&C Australia's supply chain structure supports the complexities of global supply and manages associated risks, including compliance with regulatory directives and monitoring suppliers' performance and financial stability.

GS E&C's modern slavery risks in our operations and supply chains

We understand that certain goods and services may pose higher risks of modern slavery due to the types of activities being associated with established risk factors.

Accordingly, we propose a risk matrix to be applied across our business operations and supply chain. This will enable us to identify specific features of our operations and environment that present higher risks of slavery.

The risk matrix includes risk categories of:

Risk Category	Indicators may include
Sector and industry risks	Certain sectors and industries, such as the construction industry in which we operate, may have higher modern slavery risks because of the nature of the industry characteristics, products and processes. The complex and process intensive functions within the construction industry associated with its reliance on specialised componentry and materials in global supply chains highlights the industry as one vulnerable to modern slavery risks. In mapping our suppliers, we can work to identify slavery risks associated with these process intensive materials and assessing the geographic region of production (as referred to below).
Product and services risk	Certain products and services may have higher modern slavery risks because of the way they are grown, produced, provided or used. We consider that the complex and process intensive functions used in construction and reliance on certain materials are a risk factor of slavery in our operations.
Geographic risk	In respect of supply chain functions overseas, we recognise that some countries may have higher risks of modern slavery due to poor governance, weak rule of law, conflict, migration flows and socio- economic factors like poverty. Indicators may include where the country is reported to have weak rule of law by international organisations or NGOs by virtue of corruption, conflict and/or political instability. We will endeavour to map our suppliers and identified the geographic regions in which they are based. This information will assist us identify those suppliers that may have higher risks of slavery due to the geographic region in which they operate. We have assessed our operations to be of moderate risk given our operations in some geographic regions which do not necessarily possess high-quality labour practices and conditions.
Entity risks	We are aware that some entities in our industry may not have formalised or systematic approaches to addressing labour management practices or modern slavery risks.

Risk Category	Indicators may include
	This may be attributed to the prevalence of smaller businesses we work with who do not have extensive resources to periodically produce evidence of due diligence in identifying modern slavery risks, or who may not have comprehensive systems in place because of their size. We do not initiate business dealings or enter a contract with a business partner without first verifying their reputation, skills and activities using a selection procedure and formalising through a written contract the terms and conditions of the business relationship. Similarly, we will not initiate business dealings or enter into a contract with an intermediary without formalising through a written contract the terms and conditions of the business relationship and verifying that this contract includes the clauses listed in the selection Procedure.

To assist in identifying risks, GS E&C Australia refers to public and credible sources of modern slavery data, including the:

- Walk Free Global Slavery Index (GSI);
- UN Guiding Principles for Business and Human Rights; and
- Attorney-General's Department and Australian Border Force.

We set out below more details on the actions taken by GS E&C Australia to assess and address the risks of modern slavery practices.

GS E&C Australia's actions taken to assess and address modern slavery risks, including due diligence and remediation processes

GS E&C Australia continues to expand its due diligence and remediation efforts to assess and address modern slavery risks. Our efforts are targeted to help our employees, suppliers and other business partners identify, report and address modern slavery risks as well as prevent or remove those risks.

In the event that a risk of modern slavery is detected in our supply chain, the respective supplier would be warned and given an opportunity to improve its practices. Should no improvement be discerned, the supplier would be disqualified from our approved vendor list and alternative vendors sought.

We seek to mitigate these risks as appropriate based on our policies and standards, which may include remediation based on the level of involvement with a particular supplier. Importantly, we are also engaging with our Procurement Division and suppliers to get in-depth local understanding of available resources and remediation options in those regions associated with higher modern slavery risks.

Additionally, all related actions are linked with our [Fair Trade Compliance Program](#) (CP). This program is directly supported by the CEO of GS E&C and is aimed at preventing violations of fair trade related laws through proactive examination of supply chains, preparation of compliance documentation supported with related training and internal monitoring and adjustment of organizational practices.

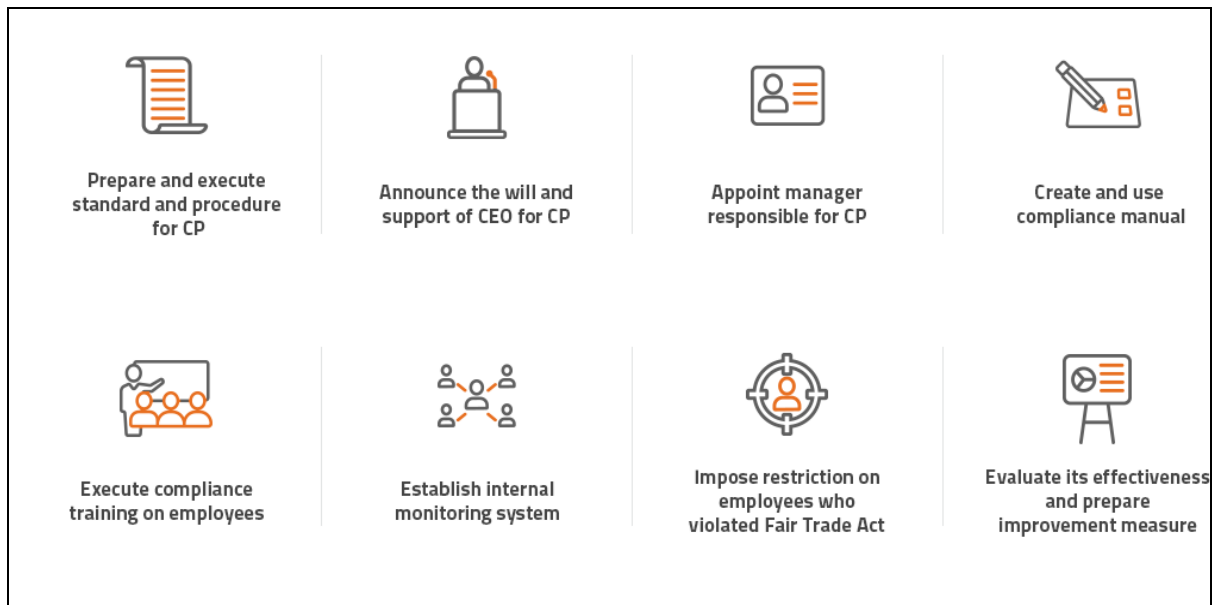


Figure 1. GS E&C Fair Trade Compliance Program – 8 Key Factors

Our actions are aided through the use of the following protocols.

Ethnical Management System

GS E&C established its Code of Ethics in 1994 as the basis for its ethical management to become a company trusted by its customers and society as a whole. This is through transparent and fair business practices. It has continued to enhance its ethnical management through training and education as well as further systematic arrangements.

The Ethnical Management System consists of the:

- Ethics Charter;
- Code of Conduct
- Practical Guidelines;
- Human Rights Policy; and
- Anti-Trust Policy

More detail about the above can be found [here](#).

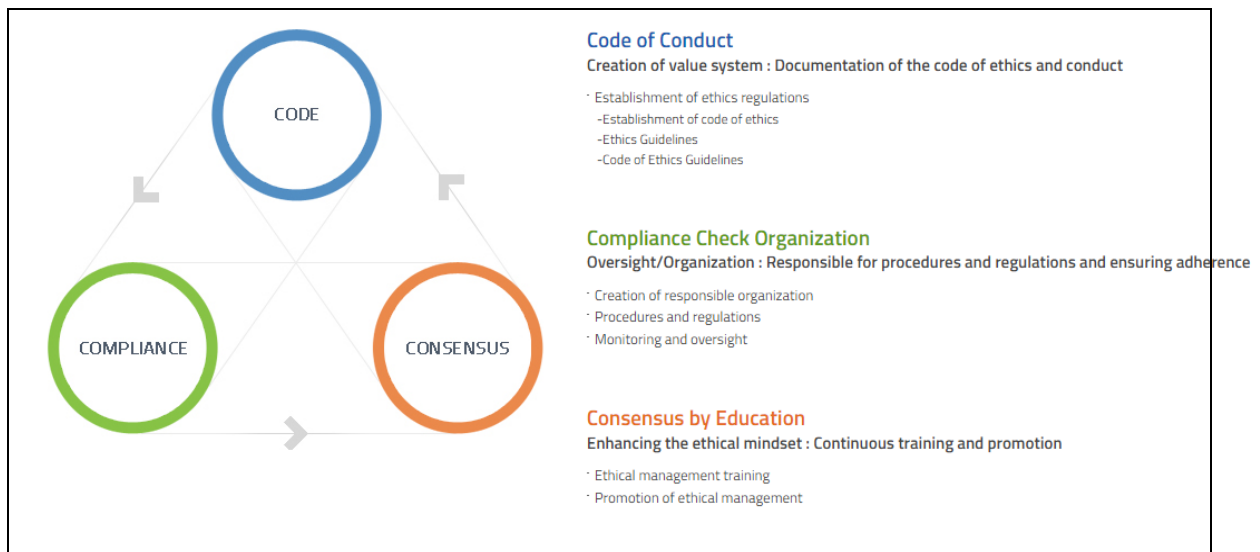


Figure 2. GS Ethical Management System

Human Rights Policy

As a globally active and responsible corporation, GS E&C is working under the highest ethical standards.

Talent Management and Respect for Diversity

Human Rights Management

Human Rights Management System

GS E&C adheres to the international standards and guideline related to human rights labor such as Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, etc. through the enactment of the Human Rights Charter, and manages human rights effectively. We take measures to minimize violations of human rights etc. that may occur from corporate activities and prevent violations in advance. We identify human rights risk elements through human rights evaluation and physical inspection of compliance with the principles of human rights, and implement human rights education for employees to improve human rights awareness and establish a sound corporate culture.

Efforts to Human Rights Management

Human Rights Training for Employees

GS E&C provides human rights training to create a corporate culture that encourages free communication and respect for diversity, in order to prevent human rights violations in advance and to ensure respect for employees' human rights. We made thorough prevention measures in areas with human rights vulnerabilities such as gender, nationality, through education for prevention of sexual harassment, education on each cultural area upon entering the business. In addition, we offer GS E&C human rights policy training for our partners to encourage them to comply with our policy.

Fundamental principles of the Human Rights Charter

1. Non-discrimination
2. Compliance with labor conditions
3. Humanitarian treatment
4. Freedom of association and collective bargaining
5. Prohibition of forced labor and child labor
6. Guarantee of occupational safety
7. Responsible supply network management
8. Protection of local residents' human rights
9. Protection of customers' human rights

Efforts to Strengthen Respect for Diversity

GS E&C respects the diversity of employees' culture and religion. We install and operate a Muslim prayer room within the head office building for Muslim employees who suffer in Korea for religious reasons. In addition, we provide guidance to Islamic mosques and halal restaurants in downtown Seoul to help minimize the inconvenience due to religious reasons.

Human Rights Assessment and Human Rights Physical Inspection for the Prevention of Human Rights Risks

GS E&C conducts a survey on human rights status and influence assessment every year to prevent human rights violations preemptively. Utilizing the survey on human rights status and influence assessment intended for our employees as well as those of our partners, subsidiaries, and joint ventures, we strive to analyze grievances that may occur at business sites and find more fundamental solutions. In 2021, we conducted the assessment on 12 human rights issues targeting 383 employees. The occurrence possibility of human rights violation is assessed to be very low at 2.2 points on a 7-point scale. In addition, GS E&C establishes and implements a human rights physical inspection process. We prepare the human rights physical inspection checklist and implement the human rights physical inspection mostly at domestic sites. After the human rights physical inspection, methods for improvement are deduced based on the inspection results, and we promote the sharing of results and improvement tasks with related departments and facilitate the improvement work.

In the first half of 2022, we implemented the human rights physical inspection on 6 sites. We explained the method for preparation of employment agreement and retirement documents, compliance with working hours and holidays, and legal standards related to the procedure for termination of employment relationship, and shared the precautions to be taken in the process of management. In addition, we improved insufficient matters that were identified on-site. In future, we plan to expand the scope of human rights physical inspection, and to diversify and advance the human rights physical inspection checklist. Using the human rights assessment and human rights physical inspection for reference, we will continue our efforts to protect human rights in our entire business process.

Human Rights Risk Analysis

(Unit: Point, 7-Point Scale)

Behaviors related to abuse of power	2.60
Restriction on the freedom of association and collective bargaining	2.50
Discrimination in the hiring process	2.43
Human rights infringement within partners	2.32
Unreasonable labor conditions	2.24
Infringement of the human rights of foreigners / local workforce and the negligence of management	2.22
Corruption and unfair behavior	2.20
Poor management of occupational safety	2.19
Infringement of environmental rights	2.18
Sexual harassment, sexual molestation, and sexual violence	2.10
Infringement of consumers' human rights	2.05
Infringement of local residents' human rights	1.92

1 point: Not at all; 4 points: Normal; 7 points: Very Good

Human Rights Physical Inspection Process



We respect the dignity of others and expects employees, subsidiaries, suppliers and contractors to comply with the policies outlined in the above conventions.

GS E&C is a signatory to the United Nations Global Compact (**UNGC**) and encourage our suppliers to adhere to the UNGC's ten principles.

Our Board of Directors Audit Committee has responsibility for oversight of the company's compliance efforts which includes the Human Rights Policy.

GS E&C Sustainability Management System for Partners

GS E&C has set 'Sustainable Global Company' as its vision and has established a sustainability management system for its partners to realise economic, environmental and social values together. We implement partner evaluations each quarter and year, disclosing the results to the partners to ensure fairness and evaluate in a systematic way.

The Company's strategic direction is aligned with the Triple Bottom Line (Environmental, Economic and Social) with specific ESG (Environment, Social, Governance) focus areas.



Figure 3. GS E&C's Strategic Sustainability Management System

In order to share our vision and principles, the company has shared an annual [Integrated Report](#) since 2011 with details on the progress of our ESG initiatives and performance as per the Triple Bottom Line criteria.

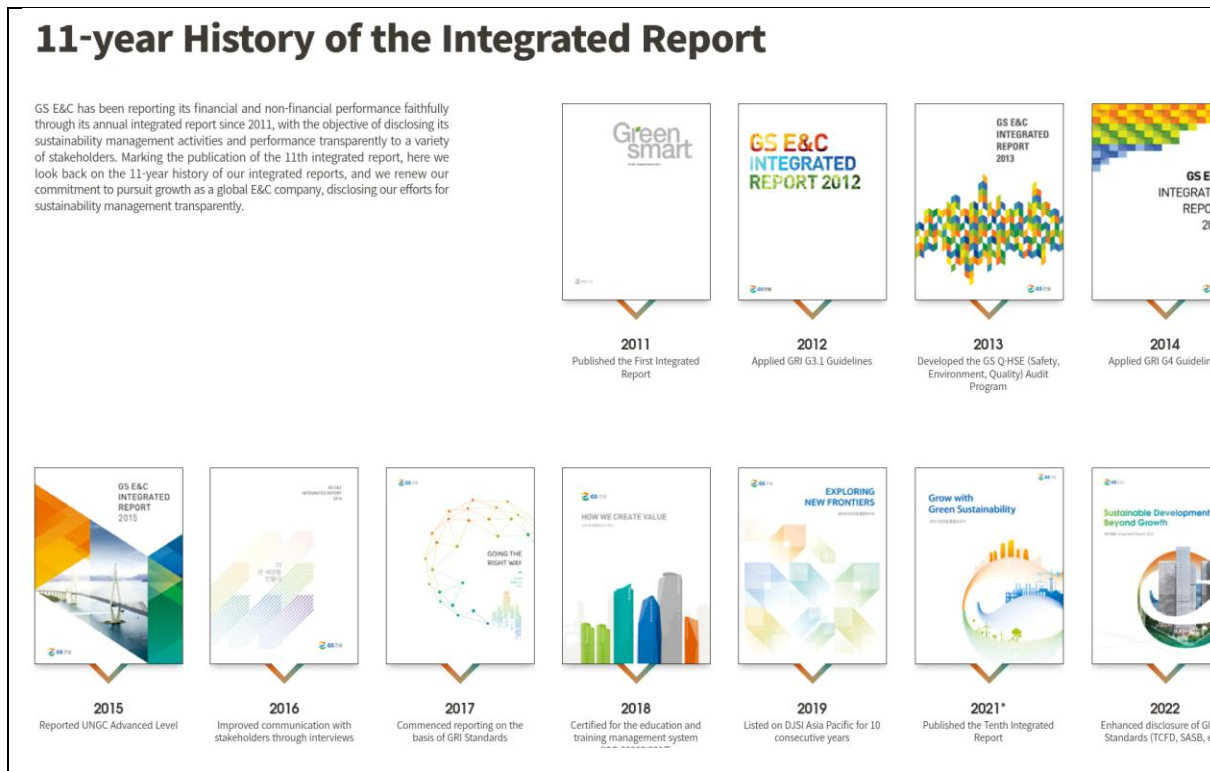


Figure 4. GS E&C Integrated Report : 11-year history

In recognition of these efforts, we received the highest grade in agreement performance evaluation by the Fair Trade Commission and the highest grade in the win-win growth index by the Accompanied Growth Committee.

GS E&C will continue to expand a systematic and fair partner management system as a basis for management of the supply network, strengthen measures for accompanied growth with partners, and promote the social responsibility of the company.

Rewarding Outstanding Partners with Incentives

GS E&C provides incentives to outstanding partners and encourages them to voluntarily establish a sustainability management system. As part of the selection process, partners are evaluated regarding the overall business activities such as the present condition of management, quality, environment, safety, construction and management.

We provide rewards such as bonus and bidding participation rights, among other things, to partner companies that demonstrate outstanding performance.

GS E&C strives to manage the economic, environmental and social risks of partners and expand the sustainability culture through the partner incentives system.

Fair Bidding

GS E&C Australia selects partners based on the basic principle of fairness, objectivity and transparency. Points are granted in accordance with the criteria for each item and the highest scoring companies are given an opportunity to participate in the bidding process.

GS E&C Australia will continuously follow this procedure in selecting partners to lead the establishment of a fair and competitive environment.

ESG Risk Management

GS E&C Australia takes measures to establish a safe and sustainable supply chain by managing Environmental, Social and Corporate Governance (**ESG**) risks of partners.

When evaluating a company for registration as a partner, we consider the credit rating, financial status, industrial accident ratio and other factors to identify potential risks across various fields. If a company is deemed to be high risk, it is prevented from registering as a partner.

Partners are monitored and evaluated on a regular basis and disqualified if no improvements are made. Warnings are issued upon finding that internal requirements are not met.

In 2021, we developed a self-diagnosis evaluation questionnaire for partners to manage ESG risks of partners. We also implemented a pilot questionnaire for 33 companies to share the ESG concept and deliver the management policy of GS E&C. Furthermore, we implemented physical inspection on 10 sites.

In 2022, we moved to expand the scope of evaluation for subject partners to 100 companies and to carry out ESG training and evaluation based on the physical inspection. In addition, GS E&C Australia enacted the Code of Conduct for partners to provide guidelines for compliance with sustainable management principles as well as the concept of human rights, safety, environment and ethics.

We will reduce the ratio of high-risk partners to 0% through continuous and systematic management of our partners.

How GS E&C Australia assesses the effectiveness of its actions in addressing modern slavery risks

GS E&C Australia assesses the effectiveness of its contractual obligations and internal processes via the following practices:

- regular reviewing and updating GS E&C Australia's policies and standard supplier contractual terms to ensure that the supplier aligns with modern slavery obligations;
- implementing regular and systematic reviews of our business and supply chain operations with respect to modern slavery risks and practices;
- identifying and tracking whether our suppliers can demonstrate to us their modern slavery awareness and due diligence processes;
- recording and assessing the nature and volume of any complaints or information about modern slavery risks through our established policy communication channels,

upcoming whistleblower policy and Sustainability Management System for Partners;
and

- to commence benchmarking our approaches with other due diligence practices reported by comparable businesses in our industry, as reported in their modern slavery statements and leading practice material shared by the Australian Government.

Consultation with any entities GS E&C owns or controls

This annual modern slavery statement relates to GS E&C Australia as the reporting entity.

GS E&C Australia does not own or control any entities at this time.

Going forward, we are committed to implementing a more structured process of obtaining feedback and sharing information about modern slavery risks and appropriate risk assessments with them - including as part of developing subsequent annual modern slavery statements.

GS E&C commitment

This modern slavery statement has been approved by the principal governing body of the entity and signed by a responsible member of GS E&C Australia, being Mr. Dongjin Kim, Managing Director.

Signed:



Name: Mr. Dongjin Kim
Position: Managing Director
Date: 31 December 2025