Stephen Edwards CONSTRUCTIONS

MODERN SLAVERY STATEMENT

FINANCIAL YEAR 2025 / 2026

REVISION: A

ISSUE: JULY 2026

stephenedwards.com.au

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Company Details

Stephen Edwards Constructions Pty Ltd (SEC) is the Modern Slavery reporting entity. Company details:

- ACN: 001 824 139
- ABN: 65 001 824 139
- Incorporation date: 1979
- Head Office: 140 Wicks Rd, Macquarie Park NSW
- Contact Details:
    - Ph: 02 9891 3099
    - Email: primary@stephenedwards.com.au
    - Website: www.stephenedwards.com.au
    - Modern Slavery Representative: Tom Glynn, Systems, Quality & Compliance Manager

Management Statement

Modern slavery is a global phenomenon which includes a range of activities that seriously deprive individual liberty and freedoms. These activities extend beyond mere unfair labour practices and unfair pay, as slavery violates fundamental human rights through coercion, threats, deception and physical control.

Modern slavery practices present a threat to fundamental human rights such as the right to dignity of human person and personal liberty.

SEC is committed to complying with the *Modern Slavery Act 2018 (Cth) & the Modern Slavery Act 2018 (NSW)*.

We are committed to ethical business practices that will contribute to the stamping out of modern slavery in all its forms by implementing a zero-tolerance system towards modern slavery through our supply chains.

SEC's direct suppliers and subcontractors are usually based locally, with the remainder normally still being Australian operated businesses. As such, SEC's exposure to risk within our supply chain is regarded as minimal.

At SEC, we have made clear to our Employees, Subcontractors and Suppliers what the company's expectations and commitment are towards eliminating modern slavery in our operations and supply chain.

This statement has been prepared on behalf of SEC in accordance with the *Modern Slavery Act 2018 (Cth) & the Modern Slavery Act 2018 (NSW)*.

This Modern Slavery Statement has been approved by the Directors of Stephen Edwards Constructions Pty Ltd.

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Structure, Operations & Supply Chains

Structure

SEC is an Australian, privately owned, family business. It is owned exclusively by our four company Directors without any parent or shell company, therefore a 'single reporting entity'.

Operations

SEC is an established Australian building company specialising in the construction of education, health, commercial, infrastructure, aged care and government projects. We complete a range of commercial construction projects across Metropolitan Sydney & regional New South Wales. Since the company's incorporation in 1979, SEC has completed over 600 construction projects. SEC employs approximately 110 staff.

The company's operations include:

- Construction
- Design management
- Cost planning

SEC typically perform the role of Principal Contractor on construction projects and employ staff in the roles of management, supervision, administration, and finance. We do directly employ a small number of trade workers who undertake ad-hoc construction tasks of a minor nature.

Supply Chains

SEC pride ourselves on long term sustainable relationships with both our clients and our suppliers. Our supplier base for labour and materials consists largely of Australian owned SME businesses who are also located in the Sydney Metropolitan area.
The procurement and engagement of subcontractors and suppliers is dependent on individual project requirements and can loosely be categorized as ;

TIER 1

- Australian owned businesses who provide raw materials and fabricated construction components
- Australian owned businesses who provide skilled manual labour for installation of building materials
- Australian owned businesses who provide electricity, telecommunications, and utilities
- A combination of Australian and foreign owned businesses who provide SAAS and data storage

TIER 2

- Australian owned businesses who provide logistics for the transport of goods and materials
- A combination of Australian and foreign owned businesses who supply plant and equipment such as tools and machinery
- A combination of Australian and foreign owned businesses who provide raw materials such as paper, wood, fuel, steel, plastics, and aluminium.

Products are often specified by our clients and their independent designers, which means that the selection of raw materials & suppliers which make up our supply chain are outside the control of SEC.

Suppliers provide products based on project requirements. We promote the supply of Australian products from Australian suppliers where possible.

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Assessment of Risk of Modern Slavery Practices

SEC have undertaken internal audit and risk assessment of the most commonly used products and services within our supply chain.
A summary of these findings is tabled below ;

TYPE OF MODERN SLAVERY RISK	RISK RATING
Direct Employment of SEC workforce There is no risk of Modern Slavery occurring in our direct operations. All workers are paid at or above Industry Awards, and there is no withholding of visas, forced labour, or underage workers. We undertake regular financial audits which would verify these practices.	Nil
Tier 1 supply chain • Workers directly contributing to our projects, but employed by subcontractors – our sites are all located in Australia, with verifiable consultation practices, and employee self-reporting to confirm workers are paid at or above Industry Awards. • Suppliers of software products and data storage – most providers are larger, reputable companies who are reporting entities in their own right with low risk profiles. • Suppliers of energy, office supplies, plant and machinery – most providers are larger, reputable companies who are reporting entities in their own right with low risk profiles.	Very Low
Tier 2 supply chain • Retail of construction materials either in raw or processed form – most providers are larger, reputable companies who are reporting entities in their own right. • Logistics companies used in the supply and transport of goods and materials - most providers are larger, reputable companies who are reporting entities in their own right.	Very Low
Tier 3 supply chain • Mining & Fabrication of construction materials and fuels – some providers are off-shore, and include international freight. Most providers remain as larger, reputable companies linked to Australian incorporated companies who are reporting entities in their own right.	Medium

Based on our risk assessment, we believe that the highest risk is within our supply chains is where imported goods, particularly those from South-East Asia, may engage workers exposed to modern slavery practices. This is also the most difficult risk to control and manage. SEC are aware of risks that exist with these supply chains and will continue to evaluate alternative suppliers based on their risk profile and active pursuits to reduce or eliminate Modern Slavery.

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Actions taken to address Modern Slavery Risks

We implement the following actions to address the risk of modern slavery;

Direct Employees

All direct employees are employed on an individual basis in accordance with Australian Laws. This removes any risk of Modern Slavery in our direct workforce.
Where SEC directly employ any person who is not an Australian Citizen, we monitor the scope and currency of visas to ensure compliance, and do not keep hold of physical copies of visas, passports, or any other document pertaining to ability to freely leave.

SEC implement an a variety of corporate policies that support and strengthen our efforts toward elimination of Modern Slavery within our Supply Chain, including ;

- Modern Slavery Policy
- Whistleblower Policy
- Corporate Social Responsibility Policy
- Workplace Bullying and Harassment Policy
- Industrial Relations Policy
- Workplace Bullying and Harassment Policy
- Equal Opportunity Policy
- Fraud and Corruption Policy
- Dispute Resolution Policy
- These policies are attached to this document.

Subcontractors' employees and supply chains

- Modern Slavery requirements discussed during Subcontract procurement
- Modern Slavery Provisions are included with Subcontracts
- Statements of compliance are required for payment to ensure that any directly employed workers of our subcontractors are legally paid for their works.

SEC Promote the engagement of the following types of subcontractors/suppliers:

- Local businesses with known workforces
- Use known subcontractors with proven record of compliance
- Preference for majority direct workforce rather than labour hire workers
- Any identified breaches of Modern Slavery compliance are recorded in formalised process that notifies all other staff involved in the procurement process – including historical breaches.

Supply chain for products used on our projects

- Modern Slavery Provisions are included with Purchase Orders
- Promote the use of Australian products where possible
- Promote the use of 'established' companies where overseas products must be used where companies have Modern Slavery compliance systems in place.
- Reviews conducted on our suppliers include informing other staff involved in the procurement processes of the business of any breaches or areas of high risk, along with promotion of low risk alternatives to current suppliers.

If Modern Slavery practices are suspected to have occurred in our Subcontract workforce or supply chains, the following process will be implemented:

- Suspend the Subcontract / Supply of Materials
- Investigate the activity to confirm if there is Modern Slavery (as defined by legislation) occurring

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- Report Modern Slavery practices to appropriate authorities
- Discontinue to use the offending Subcontractor or Supplier permanently, or if this is not reasonably practicable, suspend the use of the Subcontractor or Supplier until the Modern Slavery event / risk is resolved and sufficient measures are put in place by the organisation to prevent the re-occurrence of Modern Slavery.

Consultation & Training

Consultation with SEC Employees:

- Employees have been trained on what Modern Slavery is and how SEC will address the risks of Modern Slavery. Training Records are kept as confirmation.
- Consultation has been sought as part of this training.
- Annual refresher training will be provided the ensure that staff are kept informed and up to date on Modern Slavery requirements.
- New employees will be trained on how SEC manages Modern Slavery risks and compliance as appropriate.

Consultation with Suppliers & Subcontractors:

- Modern Slavery requirements discussed at subcontract / purchase order award
- SEC has included Modern Slavery compliance requirements in the POST TENDER CHECKLIST form. This form is used to ensure that Modern Slavery is addressed as part of our procurement process in a format that allows 2 way communication between SEC and our supplier.
- Modern Slavery Provisions are included with Subcontracts to form binding agreements

Other training and consultation:

- Tom Glynn, Systems, Quality & Compliance Manager, has undertaken training sessions and consultation with external providers who have provided guidance on Modern Slavery and our compliance requirements.
- Mathew Edwards, Director, has attended external workshops on Modern Slavery.
- We have had consultation with some key clients on Modern Slavery and how we achieve compliance e.g. Catholic Education Office and Opal HealthCare.

Assessing the Effectiveness of Modern Slavery Compliance

SEC has nominated Tom Glynn, Systems & Compliance Manager, to hold the responsibility of assessing Modern Slavery Compliance within our company. As part of this role Tom will complete checks, from time to time, on the following processes:

- Assessment on our supply chain to identify the potential of modern slavery, and any alternatives to reduce our risk exposure
- Advise our Directors and Senior Management of the findings from assessments, and any recommendations for ongoing continual improvement
- Review, update, and manage the processes, procedures, and internal training related to Modern Slavery to ensure ongoing compliance with the Act and Industry best practice
- Audit and review the implementation and outputs of our processes & procedures, including that of Modern Slavery provisions

Tom should provide outcomes of compliance checks to the Director(s) for review. If non-compliances are encountered, Tom is to immediately notify the Director(s).

SEC are aware of our reporting requirements to the Modern Slavery Business Engagement Unit within the Australian Border Force (ABF), and the NSW Anti-Slavery Commissioner's Office and will ensure that any breaches are reported as soon as practicable.

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