

Total Construction Holdings Pty Ltd (ABN 69 131 766 820)

Financial Year 2023/24 Statement of Commitment

to the *Modern Slavery Act 2018*

18<sup>th</sup> November 2024

## Reporting entity and structure

Total Construction Holdings Pty Ltd (hereafter “Total”, “we”, “our”, “us”) provides this statement on behalf of both of its wholly owned subsidiaries, Total Construction Pty Ltd (ABN 32 067 732 941) and Total Special Projects Pty Ltd (ABN 19 137 910 840).

## Operations and supply chain

We are a construction company with permanent offices in New South Wales, Victoria and Queensland. We conduct our delivery operations solely within Australia using innovative construction solutions across the aged care, health, food & beverage, commercial, industrial and education sectors. We strive to work with clients and other stakeholders who are aligned with our core values of: Accountability | Integrity | Mentorship | Respect | Collaboration | Ingenuity.

## Identification of the risks of modern slavery practices within our operation and supply chain

We pride ourselves on our strong commitment to ethical business practices. To this effect, our leaders and staff are all committed to our core purpose of *making a positive difference in people's lives through excellence in construction*, including by extension our corporate responsibility to align with practices that identify and manage modern slavery risks.

As a construction company, we understand and acknowledge that we are faced with risks of modern slavery in our operations and supply chain due to the inevitable demand for base-skill workers, who may be more vulnerable to exploitative practices, and raw materials that are often sourced from high-risk geographies. This is further exacerbated by poor visibility over long and complex supply chains.

## Systemic approach to assessing and addressing modern slavery risks

Our aim has been to mitigate the risks of modern slavery practices by applying a systemic approach which includes but is not limited to the following elements:

- We have recently developed a Modern Slavery Policy setting out our zero-tolerance position and measurable commitments, approved by our Managing Director. Becoming part of our compliance policies framework, it will be launched officially by end of 2024 together with communications, revised documents and updated training courses.
- With our inhouse human resources department staffed by experienced and competent practitioners (and furthermore, supported by access to industry bodies and company legal advisors) we ensure at all times, compliance and alignment with legislations and industry best practices relevant to employment and industrial relations.
- Operating under a third party certified ISO45001 work health and safety management system (which is also accredited by the Office of Federal Safety Commissioner), we proactively ensure that foreseeable risks to the work health and safety of workers (and any other persons) in our workplaces are minimised, if not eliminated.
- All staff is required to complete an inhouse developed modern slavery awareness training (eLearning) as part of the new employee induction program.
- We carefully select and employ competent and suitably experienced persons to fulfil roles that are at the frontline of managing supply chains and any associated modern slavery risks. Such roles include but are not limited to, Pre-Construction Managers, Procurement Managers, Subcontractor Alliance Managers, Construction Managers, Project

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Managers, Site Managers and Contract Administrators. Incumbents are required to complete an inhouse developed advanced Modern Slavery training (eLearning).

- Our internal Modern Slavery Committee headed by an Executive Management Team (EMT) member meets twice a year to review the effectiveness of our modern slavery risk controls, makes appropriate and as needed adjustments, and reports status to the EMT and board of directors.
- Modern slavery informational materials are displayed in all Total offices including construction site offices.
- We have implemented mechanisms within the tender and procurement processes to ensure due diligence checks are carried out before engaging a new product/service provider to the extent reasonably practicable. The mechanisms which include specific contractual terms and conditions also warrant that our providers are obliged to support our objective of prohibiting modern slavery practices in our supply chain.
- We have various channels for staff and other stakeholders to report actual or suspect modern slavery practices observed in our operations including the supply chain. These channels include but are not limited to, a Whistleblower Hotline provided in accordance with our Whistleblower Policy.

#### Assessment of the effectiveness of actions taken

Our Modern Slavery Committee is charged with the responsibility of measuring and reviewing the effectiveness of the mechanisms in place in place (including but not limited to those mentioned above) and reporting to the board of directors on a need basis and at least twice a year. The primary and ongoing measurements include the following:

1. Percentage of staff who has successfully completed the modern slavery eLearning and assessment.
2. Number of reports of actual or suspect modern slavery practices received (from any source via any means).
3. Timeliness of investigations into reports and effectiveness of remedial actions taken as applicable.

#### Process of consultation with all entities within the group

All Total entities share the same corporate governance function, management, staff and management systems and operate in the same industry delivery the same construction projects across the same client and industry sectors. Our Modern Slavery Committee which consists of management and staff from all Total entities has developed and implemented the modern slavery mechanisms mentioned above in place. No additional consultation is required.

#### Other Information considered relevant

In this reporting period, as mentioned above we have developed a Modern Slavery Policy to further and clearly define our commitments and support our overall compliance and corporate social responsibility framework in an integrated manner.

This statement was approved by the Board of Directors of Total for the reporting entity on the 18<sup>th</sup> November 2024.

  
Stephen Taylor  
Director of Total Construction Holdings Pty Ltd  
William Franks  
Director of Total Construction Holdings Pty Ltd

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