

Modern Slavery Statement

Introduction

This Statement is Newpol Construction Pty Ltd (Newpol)'s first Modern Slavery Statement ("the Statement") and covers the period from 1 July 2024 to 30 June 2025 ("Reporting Period").

This Statement applies solely to Newpol. There are no related companies owned or controlled.

The Statement has been produced in accordance with Australia's *Modern Slavery Act 2018* and Newpol's Modern Slavery Policy. This Statement outlines the steps Newpol has taken to identify and address the risks of modern slavery to its supply chain and business operations.

About Newpol

Newpol is a privately owned company that delivers construction projects across multiple industry sectors such as Education, Commercial, Sport and Recreation, Community, Aged Care and Health. We currently operate solely in Australia.

Newpol's Modern Slavery Risks

Newpol recognises that modern slavery is a significant global issue. According to the *Global Slavery Index 2018* report, over 40 million people are living in modern slavery worldwide.¹ Despite the prevalence of the issue, modern slavery can be difficult to identify, particularly within complex global supply chains.

Based on its business model and industry sector, Newpol acknowledges that it may be exposed to modern slavery risks due to the high demand for low-skilled, manual, and low-waged work, as well as the use of long and complex supply chains that can obscure such risks. The systems and methods used by Newpol to procure suppliers and subcontractors are managed centrally and include due diligence, vetting, and auditing during engagement on Newpol projects.

Newpol acknowledges the importance of continually reviewing its supply chains and business operations to reduce the risk that any of its activities contribute to, or facilitate, modern slavery.

¹ Global Slavery Index [2018] Dataset, Walk Free Foundation, available from: www.globalslaveryindex.org

Consultation Process

During the Reporting Period, a Modern Slavery Working Group (the Working Group) was established, comprising members of Newpol's Senior Leadership Team. As a key input to the design of Newpol's Modern Slavery Program, the Working Group, together with other stakeholders across the business, met regularly to develop and monitor the Program.

Members of the Working Group supported the preparation of this Statement. The Working Group conducted research into modern slavery risks and reviewed the company's potential exposure before drafting a new Modern Slavery Policy, which was approved by the company directors in September 2024.

The following sections summarise Newpol's focus during the Reporting Period and the outcomes of this work.

How Newpol Has Addressed Its Modern Slavery Risks

EXISTING SUPPLIER AND SUBCONTRACTOR RISK ASSESSMENT

One of the first steps undertaken during the Reporting Period was to enhance our risk assessment methodology used to assess modern slavery risks across Newpol's existing suppliers and subcontractors. This enhanced methodology will be applied to approximately 460 suppliers and subcontractors and considers a range of risk factors, including industry sector and the type of entity providing services to Newpol.

MODERN SLAVERY POLICY

During the Reporting Period, Newpol revised its Modern Slavery Policy ("the Policy"). The Policy is guided by the *Commonwealth Modern Slavery Act 2018* and forms a foundational element of Newpol's Modern Slavery Program.

The Policy outlines the ways in which Newpol seeks to ensure that human rights are respected, including by:

- Treating employees fairly
- Complying with all relevant employment laws and regulations
- Not tolerating modern slavery and human trafficking.

DUE DILIGENCE

Newpol has commenced work to enhance and centralise several internal processes to strengthen controls and oversight across its supply chain and business operations. Newpol has a dedicated procurement department that oversees all supplier and subcontractor procurement and due diligence activities.

Enhancements progressed during the Reporting Period are outlined below.

New Supplier Onboarding Checks

All new suppliers are now subject to a risk assessment process to determine whether any factors are present that may increase their modern slavery risks.

Modern Slavery Supplier Questionnaire

Newpol has developed a Modern Slavery Supplier Questionnaire ("the Questionnaire"). This Questionnaire is required to be completed by suppliers where Newpol has identified an increased modern slavery risk.

Responses to completed Questionnaires are reviewed to identify whether additional risk mitigation measures are required. These measures may include conducting further due diligence or deciding not to enter into a business relationship where identified risks cannot be adequately mitigated. Where a Questionnaire is required, Newpol will not enter into a contractual relationship with a supplier until appropriate due diligence and/or mitigation have been completed.

Supplier and Subcontractor Code of Conduct

The Supplier Code of Conduct (“the Code”) defines Newpol’s expectations of suppliers in relation to human rights, labour standards, workplace health and safety, environmental management, and modern slavery.

Newpol expects suppliers to promote safe, fair, and ethical practices within their own operations and throughout their supply chains. The Code places obligations on suppliers to monitor compliance, report breaches, and take reasonable steps to address, resolve, and prevent further breaches.

Newpol is currently in the process of incorporating the Code into all future supplier contracts.

Related Policies

While not directly part of the Modern Slavery Program, Newpol has a number of existing policies which, together with supporting systems and processes, contribute to the mitigation of the modern slavery risks.

Conflict of Interest Policy

Bribery and corruption, particularly within supply chains, are recognised contributors to modern slavery risks globally. Corrupt practices, including the acceptance of bribes, can enable conditions that allow modern slavery to occur. Newpol’s Conflict of Interest Policy supports ethical decision-making and helps mitigate these risks.

Whistleblower Policy

Newpol’s Whistleblower Policy encourages ethical conduct by providing mechanisms for current and former employees, as well as parties associated with Newpol’s supply chain, to report actual or suspected misconduct. This policy supports Newpol’s core value of integrity and enables concerns to be raised safely and without fear of reprisal.

Other Initiatives

MODERN SLAVERY TRAINING PROGRAM

Newpol recognises that one of the most effective ways to mitigate modern slavery risks is through building awareness and understanding through education. Following the Reporting Period, Newpol will implement two key training initiatives:

- As part of our new employee induction program, employees will receive training on, and be required to acknowledge, Newpol’s Modern Slavery Policy.

- Targeted training will be delivered to key personnel, particularly within the procurement and project management teams, to raise awareness of the causes and impacts of modern slavery. This training will also outline the measures Newpol has implemented to mitigate modern slavery risks.

Assessing Our Measures

As this is Newpol's first Modern Slavery Statement, it establishes a baseline for assessing the actions taken to date and for strengthening the organisation's approach to addressing modern slavery risks. Newpol has reviewed the measures implemented to mitigate the risk of modern slavery within its business and supply chains and will continue to monitor and enhance these measures over time.

In the year ahead, Newpol plans to develop appropriate metrics to assess the effectiveness of its Modern Slavery Program. These metrics will focus on improving understanding of Newpol's risk profile and evaluating the effectiveness of controls in managing identified modern slavery risks.

Approval

The Statement was approved by the Board of Directors of Newpol Construction Pty Ltd on 15 December 2025.



Alastair Grant
DIRECTOR