

Modern Slavery Statement Overview – 2025

We are pleased to present Shamrock Civil Engineering’s fourth annual Modern Slavery Statement. Shamrock Civil Engineering has prepared this statement to address the requirements of the *Modern Slavery Act 2018 (Cth)*. The statement outlines the steps we have taken, and continue to take, to identify, assess, and reduce the risks of modern slavery within our operations and throughout our supply chain. It also sets out our ongoing commitment to continuous improvement through review, monitoring, and stronger governance practices.

Our Commitment to Communities and the Prevention of Modern Slavery

Shamrock Civil Engineering recognises that modern slavery is a serious global issue that can have devastating impacts on individuals, families, and communities. We are committed to conducting our business ethically and responsibly, ensuring that our operations contribute positively to the communities in which we work.

We support the prevention of modern slavery by promoting fair labour practices, respecting human rights, and working with suppliers and partners who share our commitment to ethical conduct. Through awareness, due diligence, and strong reporting mechanisms, we aim to help create safer, more inclusive workplaces and supply chains, and to contribute to the broader effort to eliminate modern slavery in Australia and internationally.

This statement was reviewed and approved by the Board of Directors of Shamrock Civil Engineering at a meeting held at our offices in Carole Park, Queensland 4300, on **27 January 2026**.

This statement is signed by Andrew Kerr Chief Executive Officer of Shamrock Civil Engineering Pty Ltd on the 27 January 2026.

Signed



Andrew Kerr
CEO
Shamrock Civil Engineering



ABOUT US

OFFICES



190+
EMPLOYEES



200+ CIVIL
PLANT



30+ YEARS IN
BUSINESS



CONTRACT
CIRCA >\$80M



AVERAGE
TURNOVER
\$220M

QLD
Brisbane
Townsville
Rockhampton
Roma

VIC
Melbourne

SA
Adelaide

NT
Darwin

Shamrock Civil Engineering is a privately owned civil construction company, delivering services to the gas and mining, transport infrastructure, commercial, Defence and government development sectors. Our team of more than 185 staff operate across offices in Brisbane, Townsville, Melbourne, Adelaide, Rockhampton, Darwin and Roma. Our business is driven by a collaborative approach to project delivery and the diversity of our skills and capabilities.

Shamrock Civil Engineering has been providing safe, sustainable and smart solutions since 1994. We are committed to our clients and place value and emphasis on creating and maintaining long term relationships. The breadth of our civil construction expertise combined with our integrated management system, enables us to deliver complex solutions efficiently and effectively. Through our comprehensive service offering, our priorities are maintaining the safety of our people, delivering better value for our clients and supporting our local communities.

Our key civil construction services include:

- Roads and bridges
- Dams and ponds
- Stormwater drainage and fittings
- Water pipelines and infrastructure
- Sewerage pipelines and infrastructure
- Bulk earthworks
- Land and soil remediation
- Explosive ordnance facilities
- Bulk fuels
- PFAS remediation
- Hardstand and lay down areas
- Building and construction pads
- Landfill cells and facilities
- Airport runways, aprons and ancillary works
- Railway holding and marshalling yards
- Sidings and station works
- In ground services excavation, trenching and conduiting



Introduction

Modern slavery refers to a range of serious practices that involve the exploitation of individuals, including forced labour, servitude, and human trafficking. These situations occur when a person's freedom is restricted and they are unable to leave or refuse work due to coercion, threats, or deception.

Shamrock Civil Engineering acknowledges its responsibility under the *Modern Slavery Act 2018 (Cth)* to take reasonable and proactive steps to identify and address potential modern slavery risks within our operations and supply chains. We are committed to conducting our business ethically, responsibly, and with respect for human rights.

We promote fair and transparent workplace practices and have policies in place to help protect workers from unfair treatment or exploitation. This commitment applies not only within our own business, but also across the suppliers, subcontractors, and partners we engage with.

Shamrock Civil Engineering is committed to minimising the risk of modern slavery occurring in connection with our activities and to strengthening transparency in how we manage modern slavery risks throughout our supply chain. We will continue to review and improve our processes to support responsible sourcing and ethical business conduct.

Operations, Supply Chains and relevant Policies

During the reporting period, Shamrock Civil Engineering's operations required engagement with a broad supply chain to support civil construction activities across multiple Australian jurisdictions.

Modern slavery risks are most likely to arise through indirect procurement pathways, particularly where goods or materials may be sourced internationally through distributors, importers, subcontractors, or lower-tier suppliers.

Policies and Governance Framework

Shamrock Civil Engineering maintains a suite of policies and internal controls to support ethical business practices and mitigate modern slavery risks. These include:

- Modern Slavery Policy Statement and Procedure
- Code of Ethics and Business Conduct
- Whistleblower procedure

These policies were reviewed during the reporting period and updated where required to ensure ongoing alignment with the *Modern Slavery Act 2018 (Cth)* and evolving regulatory expectations.



Supply Chain Overview

To service our operations, we continue to require a large supply chain which is predominately locally based in Australia. Many of the goods and services we procure are in the form of plant and labour services from supply chain partners. The balance of our procurement are materials which are typically found and utilised in civil construction projects with a limited number of international procurements.

We procure the goods and services needed for our business's day-to-day operations from many contracted and preferred suppliers operating in Australia. Our supply chain arrangements include suppliers under the following arrangements

a. Materials Procurement (Purchase Orders)

Materials commonly procured include quarry products, precast concrete, and stormwater infrastructure components.

These materials are generally considered **lower risk**, as they are predominantly manufactured and supplied within Australia under local regulatory and workplace frameworks.

Where imported products are involved, modern slavery risks may increase due to reduced visibility of upstream supply chains. To address this, Shamrock Civil Engineering includes modern slavery compliance obligations within its purchase order terms and supplier engagement conditions.

b. Plant and Labour Hire Engagements

Plant and labour hire services are utilised to supplement internal capability, particularly for remote or regionally dispersed projects.

Labour is sourced through licensed labour hire providers within Australia and is subject to Australian workplace laws and industrial protections. As such, this category is assessed as **lower risk**, though ongoing monitoring remains important.

c. Subcontractor Engagements

Specialist subcontractors are engaged for both major and minor works, and in some cases may supply materials as part of their contracted scope.

Modern slavery risks may arise where subcontractors procure imported goods or materials from higher-risk jurisdictions. Shamrock Civil Engineering recognises that visibility beyond tier-one suppliers is limited and that this represents an ongoing industry-wide challenge.

To strengthen oversight, Shamrock Civil Engineering:

- Incorporates modern slavery clauses into subcontract agreements
- Maintains long-term relationships with key subcontractors to support transparency
- Uses external resources such as the Global Slavery Index to inform risk awareness

During the reporting period, the business continued work to better map suppliers whose supply chains may involve international sourcing. Discussions were also held with software providers to support more sophisticated supplier due diligence and vetting processes in future reporting periods.



ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS

During the reporting period, Shamrock Civil Engineering continued to implement measures to assess and mitigate modern slavery risks across its operations and supply chain.

Key actions included:

- Strengthening modern slavery obligations across all forms of engagement, including purchase orders and subcontract agreements
- Continuing planning toward more formalised supplier assessment and vetting systems
- Reviewing procurement practices to ensure suppliers understand modern slavery compliance expectations

IDENTIFICATION OF MODERN SLAVERY RISKS AND EFFECTIVENESS OF MITIGATION

A high-level modern slavery risk assessment was undertaken across key operational and procurement areas.

a. Internal Workforce

The risk of modern slavery within Shamrock Civil Engineering's directly employed workforce remains assessed as **low**, as labour is locally engaged and governed by Australian employment regulations.

b. Supply Chain Risks

Most suppliers are Australian-based and operate under robust legal and compliance frameworks, resulting in a generally **lower risk profile**.

However, risks remain where materials may be supplied indirectly through importers or overseas manufacturing. One example includes geosynthetic lining products, which may involve international sourcing.

Mitigation measures include:

- Contractual compliance obligations
- Ongoing supplier relationship management
- Continued improvement in supplier risk categorization
- Continued improvement in supplier risk categorization



GOVERNANCE AND CONTINUOUS IMPROVEMENT COMMITMENT

Shamrock Civil Engineering maintains a corporate governance framework designed to support ongoing management of modern slavery risks.

During the reporting period:

- External modern slavery audits were conducted by clients as part of their due diligence processes
- Audit findings were reviewed and incorporated into policy and procedural updates
- Modern Slavery, Code of Ethics and Business Conduct, and Whistleblower policies were refreshed

Internal activities also included:

- Annual review of modern slavery-related policies
- Procurement process enhancements to reinforce supplier obligations
- Legal review of contractual templates to ensure modern slavery compliance requirements remain current

Future commitments include:

- Expanding modern slavery awareness through induction and training materials
- Developing enhanced supplier questionnaires and selection criteria

Improving supply chain mapping and risk categorisation systems

ASSESSING THE EFFECTIVENESS OF ACTIONS TAKEN

This reporting period represents continued progress in Shamrock Civil Engineering's approach to modern slavery risk management.

Key improvements include:

- Increased supplier and subcontractor awareness through contractual obligations
- Stronger governance and accountability mechanisms
- Ongoing development of frameworks to track effectiveness using tools such as the Modern Slavery Register and Global Slavery Index

Shamrock Civil Engineering recognises that modern slavery risk management is an evolving process, and future statements will continue to reflect enhanced due diligence and more mature supplier oversight systems.



Shamrock GIVING BACK



COMMUNITY ENGAGEMENT

Shamrock Civil Engineering is committed to leaving a legacy in the communities in which it operates. The company is keen on assisting local communities through infrastructure, employment and training.

Shamrock Civil Engineering provides support to a range of community based groups and partnerships including charity golf days, educational programs, sporting teams, charitable programs and key infrastructure to organisations across the country.



LOCAL PARTICIPATION

Shamrock Civil Engineering is committed to the principles of sustainable development of Small and Medium Enterprise businesses within the local geographical footprints of our operations to enhance the socioeconomic sustainability of the local communities.

Shamrock Civil Engineering is committed to providing early communication to the local business community to allow interested parties to maximise their supply delivery opportunities with Shamrock Civil Engineering in their local region.

We approach each project individually, actively identifying opportunities for local community engagement and participation. This enables beneficial outcomes for the project team, client and local community.



INDIGENOUS

Shamrock Civil Engineering is committed to improving the social and economic welfare of Indigenous people by providing opportunities for employment, promoting career development, and providing a culturally sensitive workplace.

In May 2017, Shamrock Civil Engineering announced its partnership with Waanyi Aboriginal Corporation, an indigenous company based in North Queensland. The joint venture is known as WSU Civil.

WSU Civil recognise the importance of providing real opportunities to Indigenous communities, to assist in raising their economic and social development, which ultimately improves their standards of living and associated health and well-being status.

This has been a long standing approach to each of our business operations and this partnership now strengthens that position. We provide services to the civil construction industry, while offering local indigenous communities the opportunity to take part in wealth-generating activities on traditional lands.

Shamrock Civil Engineering's continued focus is on increasing our commitment to Indigenous engagement across the company and to create a diverse workforce. We have extensive experience working in regional and remote areas and within Aboriginal and Torres Strait Islander communities. Our policies, plans, initiatives and training programs support our commitment to provide equal opportunities.

In 2025 we launched our Reconciliation Action Plan (RAP), demonstrating a commitment to building meaningful relationships with Indigenous communities. The RAP outlines strategies for advancing reconciliation through respect, partnerships, and opportunities for Aboriginal and Torres Strait Islander peoples. This initiative aims to integrate Indigenous perspectives into operations, promoting inclusivity and equity in the industry. By incorporating reconciliation principles, we seek to foster a culturally enriched work environment that values diversity and mutual respect.





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