

Plan Group Modern Slavery Statement 2025

Introduction

This statement is made pursuant to the Australian Modern Slavery Act 2018 (Cth) for the financial year ending 30 June 2025. It outlines the steps Plan Group has taken to identify, assess, and address risks of modern slavery within our operations and supply chains.

Reporting Entities

This statement is being submitted by Plan Group Holdings ABN 47 658 624 849 in a joint statement with Plan Group Pty Ltd, ABN 67 160 102 198; Plan Group (Geelong) Pty Ltd ABN 47 618 868 429 and Plan Group (QLD) Pty Ltd ABN 43 658 625 140, as reporting entities defined by Section 5 of the Modern Slavery Act.

Structure & Operations

Plan Group is a privately owned Australian company specialising in construction, fit-out, and refurbishment services across various sectors, including commercial, education, healthcare, and government projects. Our business operations are based in Australia, with offices in major cities and a workforce comprising of direct employees.

Our supply chains encompass a diverse range of goods and services, including:

- Construction materials (e.g., steel, timber, concrete)
- Subcontracted labour and trade services
- Equipment and machinery
- Professional services (e.g., design, engineering)
- Corporate services (e.g., IT, HR, legal)

Supply Chain

We value our subcontractors and supply chain partners as part of our team and recognise that positive subcontractor and supply chain partnerships are vital to successfully winning and delivering projects.

Our assessment of our supply chain has identified that there is a risk of modern slavery occurring, however the level of risk of modern slavery existing within the business's operations and supply chain is low considering:

- We are an Australian business that operates solely within Australia and that



The majority of our service providers are Australian businesses operating solely within Australia.

Operational / Project Delivery Level Procurement

Approximately 84% of Plan Group's procurement expenses are operational or project delivery level procurement. The contract type we have with each client forms the basis of influence that Plan Group can have over the procurement of goods and services. Contract types include:

1. **Construct Only** – In these contracts, Plan Group has little control over the specification, selection of materials and manufacturers to be utilised within the delivery of the project.
2. **Design & Construct** - provide varying degrees of control over project design, material selection, and subcontractor engagement depending on the stage at which we are appointed. In these arrangements, we work closely with project consultants and design teams who are responsible for producing project documentation and specifications.

These consultants are expected to apply due diligence and risk management principles throughout the design and procurement process, ensuring that all materials, systems, and subcontractors comply with Australian Standards, the National Construction Code (NCC), and all relevant legislation. This includes explicit consideration of human rights, labour conditions, and modern slavery risks across the project lifecycle.

By embedding these expectations early in the procurement process, Plan Group aims to uphold responsible sourcing practices and reduce the risk of modern slavery within our construction supply chains.

Supply Chain Levels – Operations/Project Delivery

In order to understand the significance of our supply chain partners, Plan Group utilises levelling classifications.

Level 1

At Plan Group, procurement at the operational or project level is primarily managed through our subcontractor network, which comprises businesses that form Level 1 of our supply chain. These organisations are typically Australian-registered companies engaged under formal contract arrangements to deliver defined scopes of work. Our sub-contractor and suppliers are engaged using bespoke contracts or purchase agreements. Each of these instruments contain clauses that require compliance with Modern Slavery legislation.

On occasion, Plan Group may directly procure specific components or materials required for project delivery. In such cases, those suppliers also fall within Level 1 of our supply chain.

Modern slavery risks within our Level 1 suppliers may arise in the following scenarios:

- Where a subcontractor or supplier engages in employment practices that do not comply with Australian labour laws
- Where labour used by subcontractors or suppliers is temporary, transitional, or supported by work visas

Within our Level 1 supply chain, we have identified that some trade-based labour types present a medium to low risk of modern slavery, depending on the subcontractor's workforce composition and employment practices:

Low Risk

- Landscape
- Brickwork
- Formwork
- Concreting
- Furnishes
- Painting
- Workstation
- Auto Doors
- Flooring
- Move-Walls
- Wall Finish
- AC
- Fire
- Cladding
- Hydraulics
- Electrical
- Mechanical
- Consultants

Medium Risk

- Tiling
- Partitions
- Ceilings

- External Labour
- Removalists
- Hoardings/Barricades
- Office Cleaning
- Site Cleaning
- Final Clean
- Roadworks
- Site Establishment
- Rendering
- Demolition
- Site Security

Levels 2 and 3

Plan Group's Level 2 supply chain refers to the subcontractors and suppliers engaged by our direct subcontractors and suppliers. This includes a range of service providers, distributors, and manufacturers who support project delivery through their own procurement activities.

The Level 3 supply chain includes manufacturers, their sources of componentry, and the raw materials used in the delivery of goods and services.

Plan Group conducts a Subcontractor Prequalification Process to assess prospective supply partners before engagement. This process captures information related to modern slavery awareness, employment practices, and compliance with relevant legislation. Insights from this assessment inform our decisions when awarding contracts or procuring materials and services.

On occasion, clients may request Plan Group to procure from overseas suppliers. In such cases, Plan Group undertakes this via local agents or established intermediaries. Further to this, on these occasions, we would undertake additional due diligence using a High Risk Procurement Assessment, ensuring that procurement is undertaken in line with the National Construction Code, Australian Standards, and legislative obligations, including those concerning human rights and modern slavery.

Many of Plan Group's directly engaged suppliers are not reporting entities under the Modern Slavery Act 2018 (Cth). We therefore recognise the importance of actively communicating our expectations, raising awareness, and working in partnership to influence ethical practices throughout the supply chain.

By engaging directly and transparently with our Level 1 partners, Plan Group is also able to indirectly influence practices across the broader supply chain. This includes

the sourcing, manufacturing, and distribution activities that occur at Level 2 and Level 3, where the risk of modern slavery may be more deeply embedded.

Corporate Procurement

Approximately 1.5% of Plan Group's total procurement expenses are corporate procurement.

Plan Group's corporate procurement activities rarely involve categories with a higher inherent risk of modern slavery, however we implement robust due diligence processes to assess and mitigate these risks. Our approach includes:

- Requiring suppliers to complete Plan Group's Supply Chain Prequalification process, which captures key data on modern slavery compliance and ethical sourcing.
- Evaluating vendor capability statements and tender submissions, with an emphasis on how suppliers manage their own subcontractors and sourcing practices.
- Reviewing proposed supplier KPIs and service delivery models, including resource planning, cost transparency, and ethical performance indicators.
- Undertaking comparative analysis of supplier offers, focusing on long-term value and alignment with Plan Group's procurement standards, policies, and human rights obligations.
- Assessing each supplier's supply chain risk management approach, particularly in relation to labour conditions and material sourcing.
- Conducting supplier reviews and approvals through a cross-functional stakeholder group when relevant.
- Seeking formal approval for higher-risk procurement decisions through a Business Case submission process to Plan Group's senior leadership team.

These measures are in place to ensure that corporate procurement at Plan Group is conducted ethically, transparently, and in line with our commitment to reducing the risk of modern slavery in our operations and supply chain.

From this review, Plan Group classifies the below to be the most 'At Risk' Products:

- IT – Licenses, Equipment & Maintenance (include expenditure/
- PPE/Workwear
- Functions & Events
- Cleaning Services

- Training Organisations
- Insurances
- Professional Services (Accountants, Legal)
- Miscellaneous Consumables – purchased through large businesses such as electricity

Employment Practices

At the heart of our approach to preventing modern slavery is a strong commitment to an ethical, inclusive, and respectful workplace culture. Our People & Culture (P&C) team plays a key role in promoting and safeguarding human rights within our direct workforce through the following initiatives:

- **Fair Employment Practices:** All employment agreements are compliant with relevant Awards and the Fair Work Act. We conduct regular audits to ensure accurate pay and classification of employees.
- **Safe Reporting Channels:** Employees can report ethical concerns, including any suspected modern slavery issues, through our anonymous reporting mechanisms such as our Safety & Wellness Provider or directly to the People & Culture or Senior Leadership Teams with confidentiality assured.
- **Education & Awareness:** All new employees complete a Code of Conduct induction which includes expectations around ethical behaviour and respect for human rights.
- **Employee Engagement:** We undertake conduct regular culture surveys and encourage open dialogue to build psychological safety and surface concerns early.
- **Workplace Inclusion:** We are committed to equal opportunity, gender equity, and culturally inclusive employment practices that reduce vulnerability to exploitation.
- **Labour Hire Oversight:** In the rare instances where temporary or casual labour is used, Plan Group only engages reputable, licensed labour hire providers with demonstrated compliance. In particular we ensure they are engaged under the relevant EBA or construction labouring award.

By embedding human rights and fairness into our internal practices, we aim to create a culture that supports ethical decisions and helps prevent modern slavery in all forms.

Actions to Assess and Address Modern Slavery Risks

Plan Group has undertaken the following actions during FY2025:

- **Supplier Engagement:** Initiated a supplier assessment process requiring key suppliers to complete questionnaires on their labour practices and supply chain management.
- **Training and Awareness:** Issued training content for procurement and project management teams to identify signs of modern slavery and understand reporting mechanisms.
- **Contractual Obligations:** Updated contracts with suppliers and subcontractors to include clauses on compliance with modern slavery laws and our Code of Conduct.
- **Risk Assessment:** Began mapping our supply chains to identify high-risk areas and prioritize them for further due diligence.

Assessing the Effectiveness of Our Actions

To evaluate the effectiveness of our initiatives, we have:

- **Monitored compliance:** Reviewed supplier responses to our assessments and followed up on any red flags or non-compliance issues.
- **Internal & external audits:** Conducted internal audits of procurement processes to ensure adherence to our policies.
- **Feedback mechanisms:** Established channels for employees and suppliers to report concerns related to unethical labour practices anonymously.

Future Commitments

As part of our roadmap, Plan Group is committed to the following:

- **Enhancing supply chain transparency:** Further mapping of our supply chains to gain better visibility of potential risks.
- **Strengthening due diligence:** Implementing more robust due diligence processes for new and existing suppliers.
- **Continuous improvement:** Regularly reviewing and updating our policies and training programs to reflect best practices and legislative changes.
- **Policy Development:** Implemented a Supplier Code of Conduct outlining our expectations regarding labour practices, human rights, and ethical conduct.

- Establish a Whistleblower Policy and process for employees, subcontractors and Supply Chain partners.

Approval

This Modern Slavery Statement was approved by the Board of Directors on 25 June 2025.

A handwritten signature in blue ink, appearing to be "JD".

James Doyle
Director
Date: 25 June 2025

A handwritten signature in blue ink, appearing to be "DK".

Daniel Korber
Director
Date: 25 June 2025

A handwritten signature in blue ink, appearing to be "TD".

Tony Davidson
Director
Date: 25 June 2025

A handwritten signature in blue ink, appearing to be "JM".

Jarod Mason
Director
Date: 25 June 2025