



## Modern Slavery Statement

### The Symal Group

This Statement is submitted jointly on behalf of Symal Infrastructure Pty Ltd (ABN 87 130 808 276) (**Infrastructure**), Symal Contractors Pty Ltd (ABN 69 630 027 342) (**Contractors**) and Unyte Southern Pty Ltd (ABN 94 626 334 745) (**Unyte Southern**) under section 14 of the *Modern Slavery Act 2018* (Cth) (**MSA**) to cover the reporting period of 1 July 2024 to 30 June 2025.

Unyte Southern crossed the reporting threshold for the first time in this reporting period (2024-2025). Contractors crossed the reporting threshold for the first time in the 2022-2023 reporting period. As such, Unyte Southern is new and Contractors is relatively new to the MSA reporting requirements but are led by, and receive the benefit of, the approach Infrastructure has been progressing for many years now. We are working to progress our approach in relation to these entities.

## 1 Identification, Structure, Operations and Supply Chain (MSA ss16(1)(a), 16(1)(b))

---

### 1.1 Structure

Symal Group Limited now sits at the head of the Symal Corporate body (the Symal Group). In the reporting period the new parent body Symal Group Limited was listed on the Australian Stock Exchange (ASX) for the first time. Symal Group Limited acquired and now wholly owns Infrastructure, Contractors and Unyte Group Holdings Pty Ltd as well as a number of other entities (which don't meet the reporting threshold). Unyte Group Holdings Pty Ltd wholly owns Unyte Southern.

Contractors and Unyte Southern do not own or control any entities. Infrastructure now owns and controls the following entities:

- Symal Group Services Pty Ltd – currently a dormant entity;
- Symal Shared Services Pty Ltd – this entity employs all office staff for the Symal Group;
- Symal Infrastructure QLD Pty Ltd – for services operated in Queensland, this entity does not currently employ staff; and
- Symal Demolition Pty Ltd – a holding entity created for potential acquisition and new business.

Whilst not a reporting entity, we intend to provide more details on Symal Shared Services Pty Ltd in future reporting periods noting that this entity employs some of the Symal Group's staff.



## 1.2 Operations

Symal Group Limited a publicly listed company and specialises in the provision of civil construction services operating in Australia. Infrastructure and Contractors are both construction companies wholly owned by the ASX listed entity. Infrastructure is our building arm and Contractors is a self-performing subcontractor. Infrastructure operates in the areas of transport infrastructure, energy and resources, residential, airports, community infrastructure, water infrastructure, defence, civil structures, infrastructure, ports, tourism and leisure, technology, industrial, health, education, commercial and retail, justice, government, environmental restoration, mining and quarrying and subdivisions. Contractors specifically has an expertise in civil construction, drainage, concrete, pavements and environmental abatement works. Unyte Southern specialises in earthworks and is also a construction equipment supplier and was first incorporated in 2018. Unyte Southern has access to a huge range of plant, equipment, specialised attachments and associated services along with highly skilled operators, project and engineering teams. Unyte Southern has the ability to service, fabricate, fit and maintain its entire fleet of over 800 pieces in house, in Australia.

For financial reporting purposes, the Symal Group operates in the following reportable segments:

- Contracting Services – delivers construction projects in a variety of sectors including public infrastructure, building and construction, roads and bridges, inland and marine ports, airports, energy and defence. This includes delivery as a head contractor or sub-contractor to public and private clients under various contract models.
- Plant & Equipment – provides internal and external construction crews including supervision and project management support as well as wet or dry plant hire, in a variety of sectors including energy, subdivisions, council contracts and utility services. This includes procuring and deploying miscellaneous materials and consumables within the Symal Group and operating internal quarries including material sales and supporting quarry operations for external clients.
- Other – provides recycling and remediation operations under the Sycle brand of the Symal Group, as well as residual activities of the Bridge & Civil and Structures brands which have been discontinued. It includes corporate shared services and all corporate and inter-company consolidations.

The Symal Group is headquartered in Melbourne, Victoria and operates out of offices and yards in Victoria, New South Wales, Queensland and South Australia including in Avalon, Stawell, Rutherford, Newcastle, Brisbane, Townsville, Adelaide, Geelong and Spotswood. In the reporting period, the three reporting entities engaged the following staff:

Entity	Employee Count
Infrastructure	628
Contractors	280
Unyte Southern	236



Of these staff, only 1.9% of Infrastructure's staff and 0.4% of Contractor's staff were casual employees, with the remainder being permanent staff. For Unyte Southern there were more casual employees, with 43% of the workforce being casual. The Symal Group also engaged with a total of 20 independent contractors in the relevant reporting period. The Symal group does engage a number of staff working on visa arrangements including a range of different visa types.

We deliver projects as a head contractor or sub-contractor under various contract models including cost reimbursable, alliance, lumpsum, design, and incentivised target cost. These differing contract models provide flexibility of payment arrangements to suit differing projects.

The reporting entities do not hold any investments but the parent company Symal Group Limited invests in Wamarra Pty Ltd (**Wamarra**), a joint venture which is accounted for in our financial statements. Wamarra is an Aboriginal owned and operated contractor with a mandate of delivering high-quality construction projects while enhancing Aboriginal participation in the industry. Symal Group Limited owns 49% of this entity.

### 1.3 Supply chain

We contract with all suppliers on Supply or Frame Agreements. Our longest set rate agreements are our Frame Agreements which ordinarily last 12 months. We have subcontracts that span longer periods but they are project specific and such agreements are not common. We acknowledge that this means the majority of our supply agreements are shorter term in nature.

During our fourth reporting period Infrastructure engaged with 1,170 tier 1 suppliers, a slight decrease from our last reporting period. Contractors engaged with 731 tier 1 suppliers, an increase from the last reporting period. Unyte Southern engaged with 774 tier 1 suppliers. These included suppliers of a range of goods and services including:

- raw materials such as mesh, steel, rubber, fabric, bricks, stone, asphalt, timber, plastics, glass, sand, gravel and concrete;
- hire and purchase of safety equipment, formwork, tools, equipment and machinery;
- consumable items such as tea, coffee, catering etc;
- uniforms, stationery, furniture, information and technology hardware/goods;
- services including: construction subcontracting, demolition services, project management, soil and water testing and treatment, gardening and landscaping services, traffic management, engineering services, financial services, insurance, legal services, surveying, telecommunications services, environmental services, information and technology services, cleaning services, marketing services, recruitment services, postage, freight and transport services, waste and recycling services, and health services.



All but four of Infrastructure's suppliers are located in Australia. These suppliers are located in the United Kingdom and the United States of America. These suppliers provide Infrastructure with software, architecture services and engineering services. Contractors engages with 15 overseas suppliers including in the United Kingdom, France, Germany, Dubai and China. These suppliers provide steel in various forms, iron fencing, other building materials, waste management services, manufacturing, logistics and freight services, travel management and asset management. Unyte Southern has four suppliers based overseas in the Netherlands, the United States of America and Germany.

We acknowledge that our supply chain extends past our tier 1 suppliers and intend to gain further knowledge as to tier 2 and beyond in future reporting periods.

## **2 Risks of Modern Slavery (MSA s16(1)(c))**

---

We understand that due to the nature and prevalence of modern slavery in the world every entity has risks of modern slavery within its operations and supply chains. The Symal Group, like every entity, must continue to consider the likelihood of risks that we could cause, contribute to, or be directly linked to modern slavery practices so that we can then adjust the actions we have put in place to address any potential risks.

### **2.1 Operational risks**

Of the 50 million people globally living in modern slavery, 28 million live in conditions of forced labour.<sup>1</sup> We know that the construction industry hosts approximately 22% of forced labour victims and that understanding the reasons why is crucial addressing risks. We are aware that some of those reasons include:

- reliance on subcontracted work (including out-sourcing overseas and complex multi-layered subcontracting) which reduces both oversight of the parent company and the ability for workers to understand who is ultimately responsible for their health, safety and pay;
- reliance on manual labour which according to statistics is, in some forms, commonly undertaken by more vulnerable workers such as migrant workers, lower skilled workers, and workers on more transient employment arrangements;
- worker exposure to hazardous working conditions (such as heavy machinery, heat, chemicals etc) if health and safety risks are not managed appropriately;
- temporary and irregular contracts and fierce competition for same, meaning the associated workforces may be more vulnerable to redundancies and therefore at higher risk of exploitation;
- cost-driven projects and monetary pressures can lead to wage cuts, forced overtime and other cost-saving measures;
- the use of raw materials which are considered to be high risk products.

---

<sup>1</sup> Walk Free Global Slavery Index estimates 2023.



We acknowledge that our industry has an important role to play in acknowledging the risks that may be present in our businesses and addressing same. We are aware that our own operations pose a potential risk of modern slavery.

For Infrastructure and Contractors, a large portion of the workforce are permanent employees. However, we acknowledge Unyte Southern has a large casual workforce, and that workers on more transient employment arrangements are more vulnerable. The reason for this is that all plant hire companies rely heavily on casual staff because the industry is driven by market demand, and flexibility is required for situations where work stops or plant is stood down. We have detailed below the processes we put in place to protect this cohort. Many of our staff are highly skilled workers with qualifications, licences and certificates. Workers with a high level of skills and qualifications are more likely to have access to additional support networks outside of their employment, greater knowledge of their workplace rights, and the means and awareness to be able to advocate for themselves if need be. These elements reduce the likelihood of exploitation for such cohorts, and we believe therefore reduces the risk in our operations themselves. Currently we do also have some migrant workers in our workforce who are working on a range of visas. We understand these workers are at greater risk of exploitation primarily because of the power imbalance created by their inability to remain in the country if they lose their job, but also due to a range of other factors including language barriers, employment insecurity, lack of social supports and others.

We understand that use of recruitment services can increase modern slavery risks. We are pleased to say that we have developed a fully internal recruitment team which we consider to be a very positive step towards reducing our modern slavery risks in our operations. In very rare situations where we are recruiting for an extremely specialised role we may still utilise external recruitment agencies but this usage is negligible.

We also acknowledge that we utilised 20 independent contractors in the relevant reporting period. We have engaged these contractors for services such as project management, stakeholder engagement, coaching, logistics management, technology consulting, engineering, estimating and inspections, supervision, financial services, social procurement consultation. We consider that a lot of these services are lower risk areas but do acknowledge such contracting can reduce oversight and accountability and have detailed below the steps we take in regard to contracted work.

In the reporting period, Symal Group Limited became listed on the ASX, which requires the Symal Group to meet stringent financial and governance criteria and adhere to ongoing compliance and continuous disclosure obligations. It also means the Symal Group is subject to increased visibility and therefore accountability to all shareholders which we believe reduces the risks of unfair or unlawful practices occurring in our operations.



## 2.2 Supplier Risks

Businesses can contribute to or be directly linked to modern slavery practices through their own supply chains by conducting operations in a way that may facilitate or incentivise modern slavery, such as by placing unreasonable timing or budgetary pressures on suppliers, or simply by contracting with a supplier that is engaged in modern slavery practices. We understand that construction supply chains can typically be long and complex, which can increase the risks of modern slavery.

Of our tier 1 suppliers, only a small percentage are based outside of Australia: 0.34% for Infrastructure, 2% for Contractors, and 0.6% for Unyte Southern. Australia is a low-risk geographic location for modern slavery. We do acknowledge that we cannot consider that the products and services in our supply chain are wholly produced in Australia, given the examination below is focussed on tier one suppliers. Of the overseas suppliers, even smaller percentages are based in high-risk overseas locations: NIL for Infrastructure, 1.36% for Contractors, and NIL for Unyte Southern.

We have taken the time to analyse the changes in Infrastructure's supply chain from the prior reporting periods to the current reporting period (FY2025) in order to better understand our changing risk profile. Infrastructure's total number of suppliers decreased by 158 (after decreasing by 518 and increasing by 523 and 435 in the last three respective reporting periods). We acknowledge these fluctuations in numbers may indicate a level of transience in our supply chain, and certainly the nature of our work means that the type and location of work can and does change.

All of Infrastructure's top ten suppliers this reporting period were suppliers in the last reporting period. Of the suppliers that moved out of the top ten supplier cohort from last reporting period, all continued to supply to Infrastructure in this reporting period. We believe this indicates some stability in our supply chains, albeit some shifting in spend amounts. We make every effort to provide our suppliers with certainty and are transparent about the fact that a level of adaptability is required of our supply chains in order to complete the kind of work that we do. We are aware that that generally a supply chain that is subject to more frequent changes can be an indicator of less stable long-term supplier relationships which can increase the uncertainty for workers involved and may lead to a higher risk of modern slavery. We have commenced recording the data for Contractor and Unyte Southern's suppliers and will track the changes in risk profile these entities in future reporting periods.

We acknowledge that we engage with the following categories of suppliers that are identified in real data and the literature as posing a higher risk of modern slavery: recruitment agencies, raw materials, tools/equipment/machinery, tea and coffee, uniforms and fabrics, stationery, furniture, information and technology goods, subcontracted construction services and cleaning services. We are continuing to map our supply chains and seek to gain deeper understanding of any risks within same in future reporting periods.



### 3 **Actions to Assess and Address Modern Slavery, Effectiveness** (MSA ss16(1)(d), 16(1)(e))

---

The Symal Group continues to take steps to assess and address the risks of modern slavery occurring in our operations and supply chains. We have continued to seek expert assistance to help us accurately identify risks and put meaningful action in place in response to those risks.

#### 3.1 **Operational Actions**

Our values reflect the culture we strive to maintain and are:

1. **We Build Better Together** – We roll up our sleeves and get our hands dirty, but never forget to share a laugh. We don't just clock in and out. We make sure our team is safe and sound, and we're genuinely interested in each other's lives. We celebrate our diversity and value different thoughts, feedback and life experiences.
2. **We Innovate with Intent** – Our strength lies in our collective intelligence, our curiosity and our bravery to think differently. We're problem solvers who ask the right questions, respecting everyone's input and ideas. We have the courage to back new directions, but also take the time to think them through.
3. **We Push What's Possible** – We're not afraid to push the limits and stretch ourselves to get the best outcomes. This means having the passion to achieve greatness and the determination to drive the highest standards. When we say we will do something, we make it happen. Because when we step into new spaces we can become the best version we can be.

The name 'Symal' comes from the Latin word 'Simul' meaning 'together'. We believe our people are our greatest asset and their dedication and collaboration have driven our success. The Symal Group started as a small landscaping business in 2001 and many of our staff have been with the group for over 10 years. Our existing culture as embedded in our name and values is one that we believe is conducive to addressing and assessing modern slavery risks – particularly our emphasis on making sure our team and people are safe and sound.

#### *Policies and Processes*

In relation to our own workforce, we are continually refining various processes and policies to further our efforts in addressing and assessing modern slavery in our operations including through our:

1. Modern Slavery Legal Officer role;
2. Specific Modern Slavery Policy;
3. Code of Conduct Policy and Procedure;
4. Discrimination, Harassment and Bullying Policy and Procedure;
5. Equal Opportunity Policy;



6. Our Corporate Governance Statement;
7. Whistleblower Policy and Procedure; and
8. Tailored Modern Slavery workshops for senior staff run by independent experts.

Our Modern Slavery Policy is applicable to all staff across the Symal Group and contains our commitment to ensure there is transparency in our operations and approach to tackling modern slavery. The Policy is provided to all staff on the commencement of their employment. The Policy refers to various other internal policies that are relevant to modern slavery, relevant laws and international instruments and guiding principles. The Policy contains a definition of modern slavery and refers to human rights generally also. Our Policy educates our staff on where our risk areas may lie both within our operations and supply chains and details the risk assessment and due diligence processes we are undertaking. We advise staff of their responsibility to detect and report on risks and of the enforcement details in the event of any breach and this reporting avenue is one through which we can check the effectiveness of our actions by understanding levels of staff engagement. From an efficiency perspective, regarding safety of our workers, in the reporting period we recorded a Lost Time Injury Frequency Rate of only 0.40 from a total of 5 million hours worked which is considered to be low. Lost Time Injury Frequency Rates measure the number of injuries resulting in missed work time, standardised per million hours work. A lower figure indicates a safer workplace. We understand this is certainly not conclusive from a modern slavery perspective but is one helpful indicator we have to assure ourselves that our staff are safe and well.

Our Code of Conduct sets out the standards of behaviour expected of our staff across the Symal Group so that we can create and maintain a safe and ethical environment. It speaks to Personal and Professional Behaviour; Equity, Diversity and Social Inclusion; Conflicts of Interest; Compliance with Laws; Gifts, Benefits and Hospitality; Bribery and Corruption; Procurement; Confidential Information and Privacy; Records Management and Demonstrating Leadership. We also provide our expectations and commitments of staff within our Equal Opportunity Policy and our Discrimination, Harassment and Bullying Policy. The Symal Group recognises that many of these matters can have overlay with modern slavery and that the absence of a good culture in these areas can indicate the presence of modern slavery risks or may escalate into modern slavery in time.

We acknowledge that instances of modern slavery are often hidden in plain sight because the very nature of the crime means that victims or witnesses are powerless to come forward. The Symal Group ensures that we have sound procedures to allow workers and their families to identify and report genuine concerns about illegal conduct or any improper state of affairs pertaining to Symal without fear of reprisals and with anonymity in certain circumstances. Our Whistleblower Policy provides these protections and avenues. Providing this avenue is another key way we can track the effectiveness of our actions, we are live to the issue that receiving no complaints may actually be an indicator of a lack of awareness of risks or a lack of awareness of reporting avenues.

In prior reporting periods, we have held tailored Modern Slavery Workshops for senior staff members of the Symal Group run by independent experts. These workshops





increased the education and awareness of our senior staff members in relation to the nature and prevalence of modern slavery, the risks of modern slavery, the MSA itself and the various actions we can take to improve upon our modern slavery approach. These workshops were run in an interactive way, which enabled us to then consider what the discussions revealed about the awareness levels of staff and the effectiveness of the actions we've been taking to date.

In the prior reporting period (2023-2024), we commissioned external experts to create from scratch tailored online staff training for us. This training is specific to The Symal Group and the construction industry and includes 10 multiple-choice questions to test staff learning. We rolled this out in our most recent reporting period, this training will be conducted yearly and is mandatory for all staff.

In our recent period we also finalised the creation of our specific Modern Slavery intranet page for our staff. This page was created in collaboration with external experts and includes a video created especially for Symal by these experts giving our staff a snapshot of what modern slavery is, details on the prevalence of modern slavery, and explanations of the way modern slavery shows up in our industry including real life examples. This video explains to our staff that they play an important role in understanding where risks are for The Symal Group, in having conversations with suppliers and subcontractors, helping Symal with due diligence and keeping an eye out for the ,hardworking people in our industry. Our intranet page also has links to useful resources and a detailed Frequently Asked Question section. Importantly, our modern slavery page has a link that enables staff to anonymously tip off and self-report any concerns they have relating to modern slavery risks.

In late 2024, we adopted our Corporate Governance Statement which addresses our framework, key risks and the mechanisms we use to mitigate these risks. This increasingly robust governance framework proceeded our new board of directors, which was announced in December 2024. Our existing founding shareholders remain on the board and are joined by independent-non-executive directors. We expect that the increased oversight and resources that have bolstered our governance will have a flow on effect of maintaining good practices, a good culture and looking after our people.

All of our staff are hired on contracts that comply with the stringent Fair Work legislation in Australia. We appreciate that staff such as independent workers and casual staff are more vulnerable. We are very clear with staff about the nature of the business and that there can sometimes be transient work in construction - there are absolutely no misleading practices used in recruitment. Managers are trained to handle scenarios where work is halted for various reasons and workers are made aware of these possibilities. Our Human Resources team is dedicated to looking after casual workers as best we can and clearly communicating these possibilities. Our detailed employment contracts clearly outline the nature of these roles.



### 3.2 Supply Chain Actions

As above, we have undertaken the important task of updating and analysing our supply chain map based on modern slavery risks related to geographic location and category of goods/services for this reporting period. We are pleased to be developing a good knowledge base of how Infrastructure's tier 1 suppliers change year in and year out which enables us to assess the effectiveness of our risk responses too. We are replicating this approach with Contractors (noting Contractors only became a reporting entity in the prior reporting period) and now Unyte Southern too, to ensure we assess the effectiveness of our actions as we move through each reporting period.

In the prior reporting period we relocated a portion of the Symal Group's information and technology support offshore. We have taken the time to assess the particular modern slavery risks unique to the location of this supplier. Last reporting period we detailed the checks that were made before this new supplier relationship was entered into, including multiple visits to the office overseas, reviews of employment conditions and a due diligence processes to ensure any staff we work with in these locations experience conditions that are up to Australian standards. This due diligence process spanned 10 months and was conducted by our information and technology team and legal team as well as our procurement team. We were satisfied with the outcomes of this process and have put in place processes going forward to ensure we continue to have adequate oversight, including via regular on-site visits. Our information and technology team continue to conduct regular visits to check on the offshore team and ensure standards are met.

In the prior reporting period, we also investigated the possibility of engaging in procurement of some offshore manufacturing and in the FY25 reporting period we progressed with these contracts. Once again, the particular modern slavery risks unique to the location of this supplier were assessed. Our internal Modern Slavery Legal Officer consulted with our external experts and discussed modern slavery specific due diligence processes. External experts then drafted questions to ask of employees, and our Modern Slavery Legal Officer accompanied other staff members on a trip with a translator to visit the relevant factories of this potential supplier. A significant audit was undertaken of this potential supplier. We reviewed the answers received through these audits and questionnaires provided and engaged in a period of consultation from there. Any suppliers engaged with received the required approvals.

We continue to seek to achieve early identification of any subcontractors or suppliers over which we have little or no visibility of their supply chains. We are discussing what steps we can take to strengthen our subcontractor and supplier onboarding and monitoring processes to highlight modern slavery risk areas. Where subcontractors and suppliers are found to be non-compliant with our standards and contract terms, we will require those subcontractors and suppliers to carry out remedial action and assist them to improve their processes.

In relation to suppliers and subcontractors we have a centralised procurement team. We have a screening and onboarding process for subcontractors which involves an initial meeting with our Procurement Manager and the completion of an assessment and declaration form. The assessment is in questionnaire form and requires them to:



- disclose whether they engage employees and if so, how many;
- detail which industrial instrument applies to the contract and provide the direct number for the Fair Work Ombudsman as assistance;
- declare that they do not engage in sham contracting (an illegal arrangement that considerably increases the vulnerability of workers);
- advise whether they are excluded from performing work for the government;
- advise whether they have been subject to any adverse outcomes under the Migration Act 1958;
- detail any orders regarding unpaid fees to contractors;
- various questions that demonstrate compliance with the Building Code and require evidence of same (including what awards, enterprise agreements etc apply).

This assessment provides the Symal Group with a considerable level of oversight as to the workplace practices of subcontractors. Many of these questions go to the protection of employee's rights; the maintenance of same is a key step in mitigating the risks of modern slavery in any business. This initial screening process allows the Symal Group to understand whether a particular subcontractor's workforce may be particularly vulnerable to modern slavery as a result of any insufficient workplace practices.

The declaration does not request information but rather requires subcontractors to attest to their compliance with various clauses including:

- compliance with the Building Code and ensuring that the subcontractor's own sub-subcontractors comply with the Code;
- a requirement that the sub-subcontract contains clauses that are substantially in the same form as model contract clauses under the Building Code;
- that they are covered by appropriate industrial agreements, not excluded from performing government work, only use products that comply with Australian standards and that they will not enter into a sub-subcontract unless the relevant entity attests to these matters also and completes the Symal Group declaration of compliance.

The declaration provides the Symal Group with assurances as to our own subcontractors' workplace practises and importantly and in line with the MSA, creates a trickledown effect into tier 2 and beyond by requiring sub-subcontractors to complete the declaration also (which may then also extend beyond tier 2 given the terms). We do acknowledge that our ability to check compliance with these clauses will be reduced beyond tier 1 but have attempted to place accountability on our own subcontractors in order to achieve this.

Our Procurement Manager then conducts regular follow up meetings with subcontractors to review quality and conduct which gives us an avenue through which to assess effectiveness. Some of these meetings may also be held in conjunction with other specific stakeholders within the Symal Group. We then require subcontractors to fill out an evaluation form every year providing their compliance with the Building Code; Safety, Quality and Environmental specifications; incident reporting and investigations; emergency preparedness; training; health monitoring/surveillance; equipment monitoring; sub-subcontracting arrangements and outsourcing. This provides the



Symal Group with continual oversight into the worksite management, health and safety and working conditions generally. To ensure the ongoing effectiveness of our risk mitigation regarding subcontractors, we create from all of the data collected a list of preferred subcontractors which is based on compliance with all of the above mechanisms.

We acknowledge that these actions aren't applicable to all suppliers, only subcontractors. Our Modern Slavery Policy reiterates to our staff the importance of all subcontractors and suppliers sharing our values. In relation to our suppliers generally we also have a Sustainable Procurement Policy and Social Procurement Policy that provide important guidance over all procurement. Our Social Procurement Policy is a key mechanism through which we can create wider social benefits by linking social and economic agendas. We seek to achieve this through a variety of means such as addressing complex local challenges (e.g. intergenerational unemployment, crime, disengaged groups), promoting fair and ethical trade, social inclusion including for vulnerable groups, engaging local and small enterprises as well as social benefit suppliers, raising awareness, creating training and employment for socially and economically disadvantaged individuals, and embedding social procurement into tenders, policies and processes. Our Sustainable Procurement Policy is focussed on an environmental perspective but again we note that good governance around same can have a positive flow on effect into the area of modern slavery.

We have a Supplier Code of Conduct for all suppliers and contractors of the Symal Group. This document communicates our modern slavery expectations to our suppliers, adds to our due diligence avenues, educates and raises awareness, and provides us with further options when we're taking action to address our own risks. We are seeking to create processes whereby the Supplier Code of Conduct is circulated to all existing suppliers and all new suppliers as part of onboarding processes and will provide updates on progress in future reporting periods. As a further step, we are also in the process of considering how to roll out a specific modern slavery questionnaire to add to the various questionnaires and vetting processes we have in place already.

In the prior reporting period we reviewed all contracts to ensure any unfair contract terms were removed as per the recent legislative changes. Unfair contract terms which lead to significant power imbalances between parties create fertile ground for the sort of business pressures that can lead to exploitation and modern slavery. We have also begun the process of strengthening our existing modern slavery clauses in contracts. The clauses currently require our contractors to provide warranties regarding modern slavery, to take reasonable steps to ensure secondary subcontractors comply with modern slavery reporting requirements and respond to our requests for information in this area. External experts have reviewed these contracts further to ensure they contain terms consistent with our approach to modern slavery. We have rolled out both the modern slavery clauses and clauses dealing with unfair contract terms into our contract suite. Our Human Resources team negotiates and reviews all contracts with recruitment agencies, and we are also implementing a process whereby a final review of such contracts is then undertaken by our legal department. We are also engaging with subcontractors and suppliers to ensure their employment practices comply with the *Fair Work Act 2009* (Cth).



#### **4 Consultation (MSA s16(1)(f))**

---

The Symal Group shares a Board and has a centralised governance structure. This Board is therefore responsible for the decisions and governance of all group members and is responsible for the Symal Group's approach to modern slavery.

Given this centralised approach to governance, consultation on modern slavery occurs automatically between the various entities of the Symal Group as business is conducted.

#### **5 From Our Principal Governing Body**

---

Infrastructure, Contractors and Unyte Southern make this Statement in accordance with section 14 of the *Modern Slavery Act* 2018 (Cth). The Symal Group's Board of Directors is the principal governing body for Infrastructure, Contractors and Unyte Southern for the purpose of the MSA.

This Modern Slavery Statement was considered and approved of by the Board of the Symal Group.

**Peter Richards**

Symal Group Chairperson

Responsible Member of the Symal Group's Principal Governing Body