

MODERN SLAVERY POLICY

FY 2024/25

Our Structure

Construct ALM Pty Ltd takes seriously its position of influence as a prominent Building Company operating across metropolitan Melbourne.

Construct ALM Pty Ltd (collectively, "the company", "us", "our", "we") has created a culture which is evident in the way we behave, and honour our commitments and collaborate with all Stakeholders – Clients, Consultants, Subcontractors, Suppliers and staff.

Our structure is supported by our Director, who are backed by a highly capable executive team, as well as a comprehensive integrated management system that legally mandates employment entitlements and awards throughout the entire business.

In an industry where change is common, Construct ALM Pty Ltd values the opportunity and responsibility to create a balance of social, environmental, and economic conditions that contribute to the protection of human rights and ethical migrant labour of those in our supply chains and the communities in which we operate.

We are committed to working with our suppliers and the extended supply chain to identify and address risk-adverse modern slavery practices.

Operations and Supply Chains

Our Modern Slavery Statement (Statement) is made pursuant to section 13 of the Modern Slavery Act 2018 (Cth) (Act) and constitutes our Anti-Slavery and Human Trafficking Policy. This statement, approved by the Construct ALM Director, will be reviewed and updated on an annual basis.

Construct ALM has a long history of progressive commitment to improving people's rights and well-being across our operations, made possible by existing internal systems, our degree of ambition, and an emphasis on supply chain transparency.

Construct ALM Pty Ltd is a private construction company located at Level 13, 637 Flinders Street, Docklands, VIC 3008. Construct ALM specialises in providing residential medium density project delivery in the building industry.

Supply Chains

Construct ALM's supply chains include:

- Construction sub-contractors
- Suppliers of building Construction products
- Services that contribute to its operations, drafting, energy ratings, engineering (soil and survey) that service Construct ALM Pty Ltd's

Construct ALM's direct supply chains are based in Australia, however Construct ALM acknowledges that some suppliers also source key parts and products from other world regions.

Modern Slavery Risks

Construct ALM recognises modern slavery as a criminal offence involving civil liberties deprivation, human trafficking, forced marriage, and child labour. The risks of modern slavery do not extend to illegal actions (such as wage underpayment) that do not otherwise contain aspects of slavery, compulsion, servitude, or debt bondage, etc. However, reporting on modern slavery risks may have an influence on other surrounding requirements, particularly in terms of labour and immigration compliance.

This Statement sets out the steps Construct ALM has taken to identify and address modern slavery within our operations and supply chains. Construct ALM has found no reported instances of modern slavery breaches in our business or supply chain. We acknowledge the risks of modern slavery practices in our operations and supply chain.

Actions Taken to Address Modern Slavery Risks – Training and Awareness

An online training module on human rights and modern slavery will be issued to Construct ALM's employees including senior management. The training module covers the fundamentals of modern slavery awareness and compliance.

Training covers:

- What is modern slavery
- The types of modern slavery
- How modern slavery can infiltrate our supply chains
- Identifying risks
- Australian legislation and our reporting requirements.

Employees are required to confirm their knowledge through a quiz. Construct ALM will monitor the completion of the training and reminder emails are sent to those who have not completed it. All new employees will be assigned this training module as part of the onboarding and induction program.

Corporate Social Responsibility Engagement

There is also a risk of causing or contributing to modern slavery through the engagement of recruitment agencies, subcontractors and labour hire companies. Construct ALM is aware of these potential risks and the need to monitor and address these in an appropriate manner. Such risks include:

- Labour rights, including forced or compulsory labour, wages and benefits, work hours and child labour (including unskilled, temporary or seasonal labour); and
- Health and safety (for workers that Construct ALM does not control or who are otherwise engaged in operations outside of Construct ALM Pty Ltd control).

Due Diligence Exercise and Remediation Processes

Construct ALM continues to acknowledge the importance of having efficient modern slavery remediation protocols in place to respond to the identification of cases of modern slavery in a way that does not endanger the safety of victims. Construct ALM recognises the need of having a trusted, confidential grievance procedure (and ensuring that our suppliers have one as well) to alleviate and address worker concerns, as well as to serve as an early warning

system for modern slavery dangers. As a result, Construct ALM has incorporated due diligence, grievance, and remedy procedures into our governance and frameworks.

Whistleblower Protection – Every Construct ALM employee and supplier has access to our policies, which they can utilise to report suspected instances of modern slavery, in any form, in our own business and operations or any of our supply chains, without fear of repercussions or reprisal.

Assessing Effectiveness

An annual assessment will take place to review the action planning undertaken by Construct ALM to identify, monitor and evaluate the effectiveness of our systems and controls in place to mitigate the risk or potential risk of modern slavery.

Construct ALM will assess our subcontracts and purchase orders and ensure our supply chain has similar policies in place where possible. We confirm that there have been no modern slavery breaches, or we are not aware of any instances of modern slavery breaches.

Construct ALM does not tolerate any behaviours that are in breach of the modern slavery law, and our employees, subcontractors and suppliers operate in line with our standards.

Process for Remediation

Construct ALM will have internal resources to develop and implement a remediation process. This process will be managed in coordination with the relevant management team.

This statement was approved by the Directors of Construct ALM Pty Ltd.



Anthony Caruana
Director

Construct ALM Pty Ltd
Level 13, 637 Flinders Street, Docklands, VIC 3008