



MODERN SLAVERY STATEMENT

UNCONTROLLED WHEN PRINTED

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1. Acknowledgement

Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body *(insert primary entity below)*:

McNally Group Holdings Pty Ltd

as defined by the Modern Slavery Act 2018 (Cth) on *(insert date)*:

25 August 2025

Signature of Responsible Member

This modern slavery statement is signed by a responsible member of the above-mentioned principle governing body *(apply appropriate signature below)*:



RHYS JARROD McNALLY

**DIRECTOR of McNALLY GROUP
HOLDINGS PTY LTD**

25 AUGUST 2025

Mandatory Criteria

The below table summary indicates where appropriate responses to each criteria item required under Section 16 of the Act can be found within.

Requirement	Page Number
Identify the reporting entity	Page 3
Describe the structure, operations, and supply chains of the reporting entity	Page 3
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Pages 3 & 4
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Pages 4 & 5
Describe how the reporting entity assesses the effectiveness of such actions	Page 5
Describe the process of consultation with any entities that the reporting entity owns or controls	Page 5
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Additional

2. Entity Coverage

This statement applies to the following entities:

- McNally Group Holding Pty Ltd
- McNally Group Contracting Pty Ltd
- McNally Group Pty Ltd
- MC Mardie Pty Ltd
- McNally Mining and Resources
- McNally Commercial

3. McNally Structure and Operations

McNally is subject to the Australian Modern Slavery Act 2018 (Cth) which covers all the entities within the McNally Group, and it produces a statement signed by the Managing Director addressing the requirements of this legislation on behalf of its subsidiary companies.

McNally is a specialist manufacturing and construction company that includes McNally Mining and Resources, McNally Commercial, McNally Residential and several other acquired businesses.

McNally is one of the most trusted names in the manufacture, construction and refurbishment of modular building solutions, mining camps and villages and non-process infrastructure.

We have established this unparalleled reputation by aligning our team with our core values and common purpose, our professionalism and by keeping our promise.

“We do what we say we’re going to do. Build to the highest quality first time, on time, all the time”. We build better.

Modern slavery can take many forms including the trafficking of people, forced labour, child labour, servitude and slavery. As a significant contributor in the industries that we operate in, we take our responsibility for undertaking our business ethically seriously and are aware of the potential for being targeted by modern slavery practices.

Our intended processes around supplier engagement ensure our suppliers are aware of their own obligations and the risks as well as the requirement to report any non-conformances, so that we may take the necessary action promptly and effectively should any contraventions be identified.

Sectors affected include, but are not limited to, construction and property, engineering and manufacturing and mining and resources.

4. McNally Supply Chains & Modern Slavery Risks

We contract with third parties who provide services to assist with the everyday running of our business, such as property maintenance companies (Electrical and Plumbing), as well as Companies who provide office cleaning services and that are responsible for the provision of office supplies.

Most of our suppliers are geographically located within Australia. However, we do acknowledge that a small portion of our suppliers maintain operations outside of Australia.

We acknowledge that the risks of modern slavery may be heightened in some of our identified supply chains because of the geographical location of these suppliers, and the source of materials used in products supplied to us. In particular, materials like plumbing and bathroom related manufacturing materials (i.e. showers, basins, cabinets and cabinet construction materials as well as steel coil). These products sourced from China and Singapore have been identified as products whose production processes carry risks of modern slavery.

We also acknowledge that; we lack visibility in these overseas areas, and this carries additional risks of modern slavery, especially in secondary levels of our chain of suppliers and source materials used in some of our business's goods.

We acknowledge that by virtue of contracting with other parties, whether as a client or as a supplier, there is always some risk that may contribute to modern slavery practices. We expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally compliant, and professional manner by adhering to the McNally Supplier Code of Conduct. We also expect our suppliers to promote similar standards in their own supply chain.

5. Actions Taken to Assess and Address Modern Slavery Risks

Operations and Suppliers

We continue to adhere to and implement our Modern Slavery Policy; revise and update our internal policies; and continue to review our supplier engagement processes.

We have also launched our Supplier Code of Conduct.

Supplier Code of Conduct

As a part of our ongoing commitment, McNally will regularly review and update its Supplier Code of Conduct, which is a document that is relevant to all suppliers to McNally. Suppliers will be expected to adhere to the McNally Supplier Code of Conduct, which includes specific reference to various matters including human rights, anti-bribery and corruption, and modern slavery and human trafficking. Suppliers are expected to have in place a policy recognising, respecting and protecting the human rights of their employees, those of their suppliers and business partners and the communities affected by the suppliers' operations.

McNally's position, which is detailed in its Supplier Code of Conduct, is that suppliers are expected to (without intending to be exhaustive):

- Comply with all laws in respect of the privacy of personal information.
- Comply with applicable laws in respect of employment practices.
- Protect workers from all forms of harassment, including bullying, sexual harassment, coercion, discrimination, victimisation, vilification and physical and verbal abuse.
- Be an equal opportunity employer and eliminate work and employment practices that disadvantage certain groups of people.
- Not discriminate against any worker on the basis of age, disability, ethnicity, gender, marital status, political affiliation, race, religion, sexual orientation, gender identity, union membership or any other status protected by law.
- If worker housing is provided, ensure it meets country of operation and safety standards.
- If workers are transported to the work location, provide appropriate return transportation.

Cooperation with Clients

Our clients in the sectors that we operate in, range in size. That being the case, McNally is familiar with participating in client audits of their respective supply chains. In doing so, McNally is able to observe its clients' own practices on the prevention of modern slavery and learn and adapt these practices to best fit McNally operations.

Engagement with Suppliers

McNally has launched its Supplier Code of Conduct which is a mandatory document provided to all suppliers involved with the businesses. This document outlines clear expectations to our suppliers on behavioural expectations and adherence to legislative and best practice requirements.

Ability for Employees to Raise Concerns

All McNally employees have the ability to voice concerns, predominantly through local reporting mechanisms. McNally is committed to protecting employees when disclosing malpractice and will ensure that all disclosures made will be treated confidentially and without fear of retaliation.

It is by receiving and evaluating feedback and maintaining a culture of compliance that McNally can assess the effectiveness of its practices and procedures.

6. Assessing the Effectiveness of the Actions Taken

Our focus continues to be to gain a better understanding of our modern slavery risks and how such risks may be present in our operations and supply chains.

We will continue to work on developing frameworks and processes to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply. These frameworks will allow us to review, audit and report on the effectiveness of our affirmative actions in relation to modern slavery risks across our supply chain.

7. Entity Consultation

McNally continues to actively engage and consult with all companies we own in the implementation and effectiveness of this statement (entities outlined in Section 2, Entity Coverage). We are aware of the relevant legislative reporting requirements; information regarding the actions we are taking to address these requirements and provide all companies we own with relevant materials and updates.