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Introduction

Criteria 1 Identify the reporting entity

About this Statement

Modscape has prepared this Modern Slavery Statement (**Statement**) to address the requirements of the Australian Modern Slavery Act 2018 (Cth) (**the Act**). This Statement applies to the following entities:

- Modscape Holdings Pty Ltd
- Modscape Commercial Pty Ltd
- Modscape Residential Pty Ltd
- Modscape Install Pty Ltd
- Modbotics Pty Ltd

In this Statement, a reference to 'Modscape', 'we' and 'our' refers to Modscape Holdings Pty Ltd and the entities set out above.

Modscape Holdings Pty Ltd is registered in Victoria.

Reporting Period

This is our first Modern Slavery Statement. The reporting period covered by this Statement is:

1 July 2024 to 30 June 2025 (**FY25**).

Approval and Consultation Process

This Statement has been reviewed and approved by the Board pursuant to the Act on 15 December 2025, and signed by Co-Founder and Director, Jan Gyrn, CEO.

In accordance with the Act, this Statement sets out the steps we have taken during FY25 to identify, assess and address the risks of modern slavery practices in our operations and supply chain.

Feedback about how we are addressing our modern slavery risk is welcome at: info@modscape.com.au.



Jan Gyrn
Founding Director & CEO

Our Operations

Criteria 2

Describe the reporting entity's structure, operations, and supply chain

Who we are

Established in 2006, Modscape is a 100% Australian owned private company specialising in off-site prefabricated modular construction services.

We are one of Australia's leading experts in modular construction and have designed and constructed over 700 projects spanning residential, health and aged care, education, infrastructure, retail, hospitality, sports, and the community sector.

We continue to push the boundaries of innovation and forward-thinking design and construction, as well as delivering the best result for our customers, our community and the country.

Our structure

Modscape operates as a consolidated corporate group with controlled entities. All entities are incorporated or established in Australia. Modscape Holdings Pty Ltd is the head company and reporting entity.

Modscape is headquartered in Melbourne with additional offices in Sydney and Brisbane, and manufacturing facilities in Melbourne and Brisbane. Modscape has 125 direct FTE employees.

The Executive Leadership Team provides oversight of corporate governance, risk management, and compliance, including the systems and processes used to identify and manage modern slavery risks across our operations and supply chain.



Modscape + Modbotics, Essendon Fields VIC

Our Operations

Criteria 2

Describe the reporting entity's structure, operations, and supply chain

Our Operations

Modscape is a prefabricated modular construction company. Our operations are centred around combining design excellence, offsite manufacturing, and automation to deliver smarter, faster, and more sustainable buildings.

Our projects are constructed to 90-95% completion in a controlled off-site manufacturing environment. This factory-based approach eliminates risks associated with weather and onsite delays, ensuring a fixed timeline for design, construction and delivery.

Our in-house robotics and automation arm, Modbotics, is fully integrated into the build process, supporting quality, efficiency, and scalability across projects in residential, healthcare, education, infrastructure, and hospitality.

Our headquarters operate from a 24,000 sqm facility in Essendon Fields, supported by offices in Sydney and a second manufacturing hub in Queensland. Across these locations, our 120+ team members work within integrated spaces – our purpose-built factory and collaborative design office – enabling seamless project delivery from concept to completion.

Our approach is design-led, deeply collaborative, and built for end-to-end delivery – ensuring certainty of time, cost, and quality on every project.

Our Governance

Modscape is led by Co-Founder and CEO Jan Gyrn, supported by an Executive Leadership Team. Together, our CEO and Executive Leadership Team are responsible for the long-term success and oversight of our business, and upholding the highest standards of corporate governance. Senior managers responsible for functions susceptible to modern-slavery risks report directly to the Executive Leadership Team.

Our Executive Leadership Team lead our operations and execute the company's strategic objectives and are expected to behave ethically and with integrity when dealing with our clients, colleagues and other stakeholders. This includes, but is not necessarily limited to, full compliance with all legal obligations imposed by statute or any other source of law, including our modern slavery statement.

Our Supply Chain

Criteria 2

Describe the reporting entity's structure, operations, and supply chain

Our Supply Chain

Modscape does not directly procure materials or services from overseas suppliers. However, we recognise that our domestic suppliers may procure services and materials from outside Australia, including from geographies that are considered to have a higher risk of modern slavery.

Our most significant supply chain comprises goods and services sourced from suppliers within the construction industry in Australia – from raw materials and prefabricated components to equipment and subcontract construction services, as well as transportation and crange services.

We also rely on a broad range of goods and services to support our operations such as: safety equipment, personal protective equipment / work wear, workforce labour hire, workforce resources, technology and hardware, transport, travel and accommodation, and general facilities equipment and maintenance.

We consider our own operations to present a low risk of modern slavery, while our greatest potential exposure to modern slavery practices lies within our extended supply chain.

The activities we have undertaken to date are aimed at improving our understanding of these potential risks, enabling us to conduct more targeted supplier risk assessments across our supply chain.

In FY25, we engaged with 635 suppliers.



Kindergarten, Thornbury VIC

Assessing Modern Slavery Risk

Criteria 3

Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

Assessment

In FY25, our focus was on assessing our Tier 1 suppliers and building foundational visibility into the modern slavery implications of their own supply chains. Tier 1 suppliers include high-spend suppliers that meet the benchmark threshold, and suppliers designated as strategic, irrespective of spend.

Our assessment was undertaken through Modscape's Modern Slavery Questionnaire, which collects information on suppliers' sourcing practices, governance systems, and risk controls.

Analysis of responses confirmed that while Modscape does not directly procure from high-risk regions, several Tier 1 suppliers procure materials or components from overseas manufacturers. These upstream activities intersect with known high-risk categories identified in international benchmarks, including:

- Metals and fabricated steel products
- Timber and timber-derived materials
- Electronics and technology hardware
- PPE, uniforms, and textile-based products

These categories are globally recognised as having elevated modern slavery risk due to the nature of raw material extraction, labour practices, and manufacturing environments.

To understand our broader international exposure, we also utilised the Global Slavery Index (GSI), produced by Walk Free. The GSI provides data on country-level prevalence of modern slavery and government actions, enabling us to develop an informed view of where risks may arise within multi-tier supply chains beyond direct visibility.

Our direct workforce of 125 FTE employees is located in Australia and is comprised of skilled professionals delivering office-based services (77%), and factory-based trade qualified staff (23%).

We consider modern slavery risk in our direct operations is low due to the workplace protections we have in place and the nature of our workforce.

All Modscape employees receive written contracts outlining their conditions of employment and earn wages in accordance with Australian workplace laws. All our direct employees are covered by a comprehensive suite of policies designed to foster a safe, inclusive, and fair working environment, free from modern slavery.

Our greatest modern slavery risk arises from our indirect workforce supplied through our subcontractors. Our process for managing this risk is contractual. All subcontractor agreements mandate compliance with modern slavery legislation and require subcontractors – and their secondary subcontractors – to implement binding ethical conduct and modern slavery compliance guidelines.

We do not charge recruitment fees to any employee, and all identity and work rights checks are verified before commencement. These controls reduce the risk of exploitative recruitment practices within our direct workforce and help ensure that all employment relationships at Modscape are lawful, transparent, and free from coercion.

Assessing Modern Slavery Risk

Criteria 4

Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes

Actions Taken

During FY25, Modscape focused on establishing a foundational understanding of modern slavery risks within our supply chain.

We implemented our first Modern Slavery Questionnaire for Tier 1 suppliers to gather information on their sourcing practices, governance frameworks, and visibility of their own supply chains.

Responses enabled us to identify suppliers connected to higher-risk product categories such as metals, timber, electronics, and PPE, where global exposure to modern slavery risk is more prevalent.

In addition to supplier engagement, we utilised the Global Slavery Index (GSI) to better understand country-level risk factors and the broader context in which upstream manufacturing may occur.

This initial assessment phase strengthened our oversight, improved our understanding of where risks may exist beyond direct procurement, and laid the groundwork for a more targeted risk assessment approach in future reporting periods.

Next Steps

In FY26, Modscape will build on the insights gathered from our initial assessment and take steps to further strengthen our due-diligence processes.

We will expand the visibility of our supply chain by introducing a supplier risk-tiering model to help prioritise suppliers for deeper review, particularly those associated with high-risk product categories or complex international sourcing pathways.

Enhanced due diligence will be undertaken where required, supported by updated procurement contracts for our consultants, subcontractors and purchase orders that incorporate modern slavery clauses and clearer supplier obligations.

These actions will be integrated into our annual modern slavery risk assessment cycle, supporting continuous improvement and ensuring Modscape remains aligned with legislative expectations and industry best practice.



Private Residence, Burradoo NSW

Effectiveness of Actions Taken

Criteria 5

Describe how the reporting entity assesses the effectiveness of these actions

We strengthened our internal governance by implementing an updated Modern Slavery Policy, assigning clear responsibilities to executive leadership, managers, and appointing a Modern Slavery Compliance Officer (MSCO). Modscape's policies outline our zero-tolerance approach to exploitation and establish expectations for conduct across our operations and supply chain.

Our review highlighted that we are in the early stages of embedding modern slavery requirements into our onboarding, procurement processes, and contract templates. While these elements are not yet fully established across all areas of the business, we have commenced this work and are progressively building the foundations for a consistent organisational baseline. As these processes mature, we expect them to strengthen risk identification and improve visibility across our supply chain.

We introduced a supplier risk assessment process and distributed our inaugural Modern Slavery Supplier Questionnaire. The questionnaire achieved a strong response rate and has improved visibility across our Tier 1 suppliers. Early analysis shows increased supplier awareness and willingness to engage with our expectations.

Our monitoring indicates this activity has been effective in identifying gaps, particularly where suppliers lacked documented policies or grievance processes. These insights now inform targeted follow-up actions, including corrective action engagement and capacity-building conversations with suppliers.

Modern slavery clauses were added to new and renewed supplier contracts, providing a clear legal basis for expectations, audit rights, and cooperation. This step has been effective in increasing supplier accountability and aligning procurement processes with risk-based considerations.

Effectiveness of Actions Taken

Criteria 6

Describe the process of consultation with any entities that the reporting entity owns or controls

All employees will be assigned to complete a modern slavery awareness module, with higher-risk roles receiving additional guidance. The training is designed to improve understanding of:

- key forms of exploitation
- indicators of modern slavery
- the importance of due diligence in construction supply chains
- internal and external reporting pathways

The training is expected to build capability, strengthen reporting confidence, and embed modern slavery awareness into day-to-day operations.

We are in the process of establishing clear internal and anonymous pathways for raising concerns, including modern slavery related issues. While these mechanisms are still being formalised and embedded into our policies, training, and broader communication channels, we have begun laying the groundwork to ensure employees and suppliers will have safe and confidential avenues to report concerns once these systems are fully operational.

No modern slavery incidents were identified during the reporting period. As we continue developing these reporting mechanisms, we recognise the need for further communication and awareness to support their effective use and to build confidence across the workforce and supply chain.

The same policies and procedures apply to Modscape Holdings Pty Ltd and its subsidiary entities.



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Better by Design

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