

Bringing work to life.



Modern Slavery Statement

2023/2024





Acknowledgement of Country.

MPA acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters, culture, and contribution to society. We pay our respects to Ancestors and Elders, past, present, and emerging.

Artwork "Still Growing" - Designed by Dennis Golding, a Kamilaroi/Gamilaraay artist from the northwest of NSW.

Introduction	1
Our structure, operations and supply chains	2
2.1 Structure	
2.2 Operations	
2.3 Supply Chain	
Modern slavery risks in our operations and supply chains	3
3.1 In our operations	
3.2 In our supply chain	
Actions taken to assess and address modern slavery	4
4.1 Risk assessment and approach to remediation	
4.2 Recruitment	
Assessing the effectiveness of our actions	5
5.1 Modern slavery goal tracking	
5.2 New goals for next reporting period	
Consultation and approval	6
Annexure A	
Existing actions to assess and address modern slavery risks	
1.1 Risk assessment	
1.2 Supplier accreditation program	

This statement is made by MPA Holdings (Aust.) Pty Limited pursuant to the Modern Slavery Act 2018 (Cth) and sets out the actions taken by it and its subsidiaries (together, “MPA”, “we”, “us” and “our”) to assess and address modern slavery and human trafficking risks within our business and supply chain for financial year ending 30 June 2024 (Reporting Period) and actions taken to address those risks.

2.1 Structure

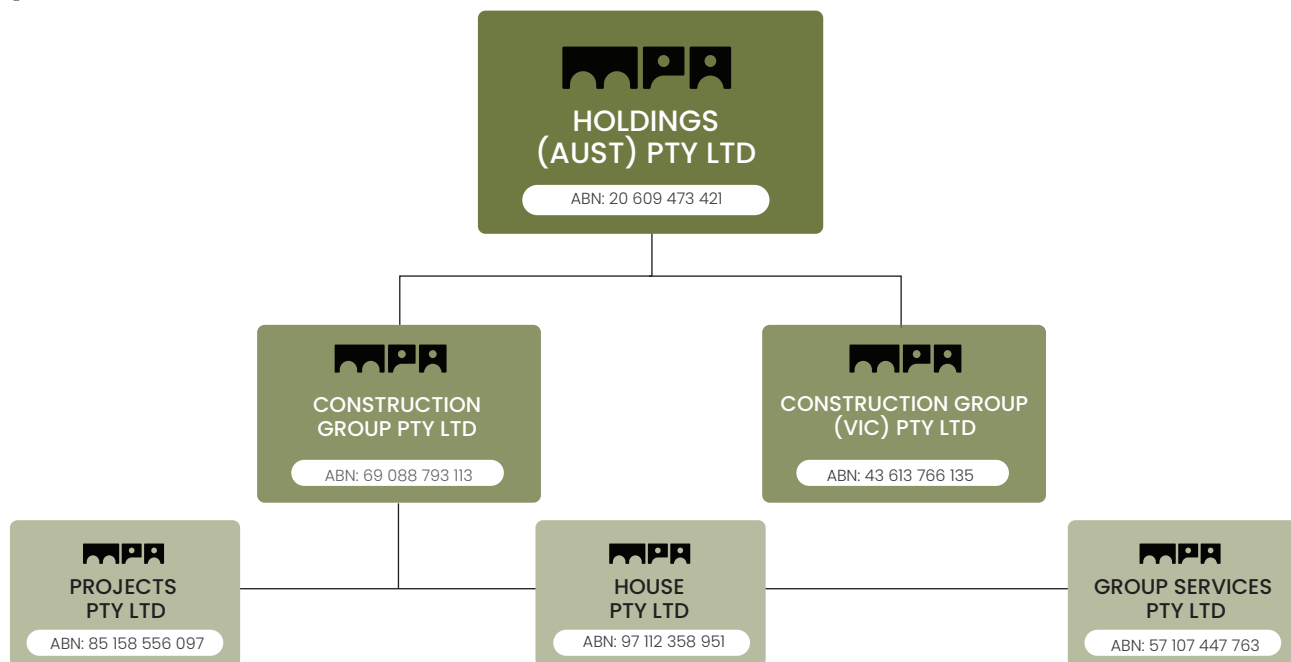
MPA Construction Group Pty Limited (MPA Construction Group) is a Proprietary Limited Company, which is part of a corporate group which is entirely registered and controlled within Australia, being headed and wholly owned by MPA Holdings (Aust.) Pty Limited. MPA Construction Group is the primary trading entity within the corporate group.

MPA Group Services Pty Limited is an entity within the corporate group that is wholly owned by MPA Construction Group.

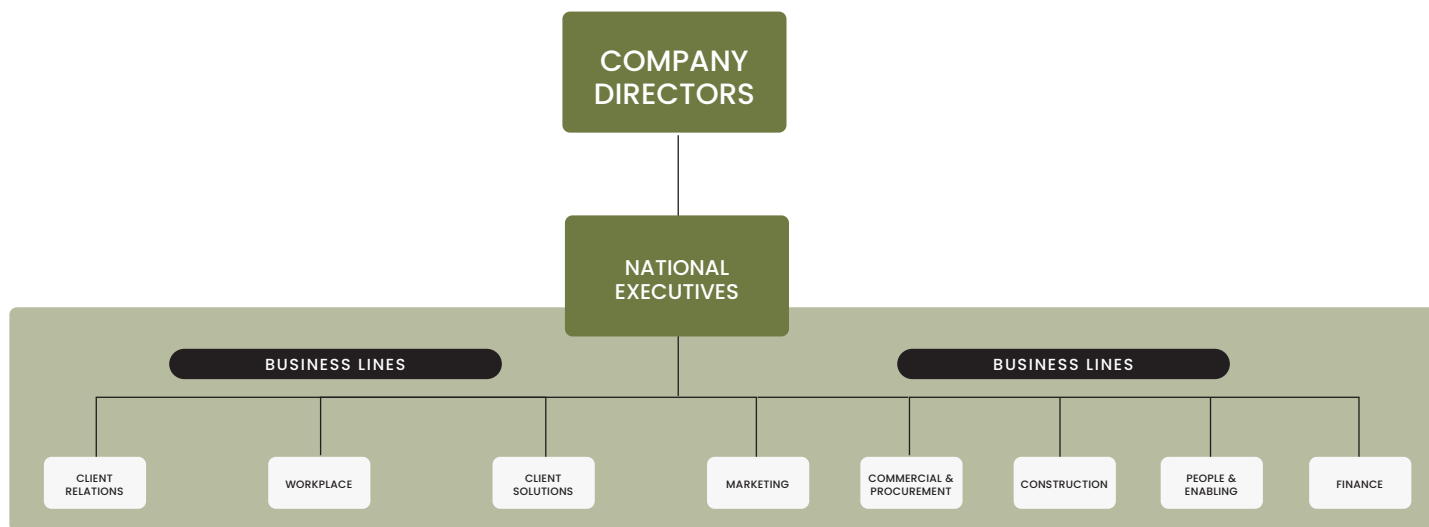
Other related entities within the group are:

1. MPA Holdings (Aust.) Pty Limited – this is the head of the corporate group as mentioned above and currently registered with ASIC. It has no employees.
2. MPA Construction Group (VIC) Pty Ltd – 100% owned by the group head entity MPA Holdings (Aust.) Pty Limited and currently registered with ASIC. However, this company is dormant and has no employees.
3. MPA House Pty Ltd – 100% owned by MPA Construction Group Pty Limited and currently registered with ASIC and has no employees.
4. MPA Projects Pty Ltd – 100% owned by the group head entity MPA Construction Group Pty Limited and is dormant and has no employees.

Corporate Structure



Organisational Structure



In informing our approach to assessing modern slavery risks in our operations and supply chains, we have observed how the subject matter intersects with almost all of our business lines. As a result, modern slavery continues to be a topic that has come to be familiar with many of our employees, including management, executives and directors. By introducing measures to assess and address modern slavery risks, as described in this statement, different parts of our business have had to adapt and increase their awareness of modern slavery to implement risk mitigating measures as part of the business-as-usual approach.

2.2 Operations

MPA operates out of two offices, with the Sydney office being the main office in which most of the support functions employed in MPA Group Services are located.

The addresses of the offices are:

- L12/50 Goulburn St, WORLD SQUARE NSW 2000
(the registered office and principal place of business)
- L2/99 King St, MELBOURNE VIC 3000

MPA Construction Group Pty Limited and MPA Group Services are the only entities within the group that have employees.

Further detail about the roles of employees in each entity is outlined below.

MPA Construction Group is the primary trading entity within the corporate group, and employs thirty-one (31) employees, who are all normally based in both NSW and VIC. The employees are all project site employees, such as Site Managers who help to manage and coordinate subcontractors and activities at project locations.

MPA Group Services Pty Limited is an entity within the corporate group that is wholly owned by MPA Construction Group. It employs most employees within the group, and provides the basic corporate support functions and office based project activities that support MPA Construction to deliver the projects that are contracted to it. MPA Group Services employs one hundred and thirty-eight (138) employees across various roles including project management, procurement, design, marketing, finance, people & culture, reception and executive roles.

All employees are employed by MPA Construction Group or MPA Group Services under common law employment contracts. All employees are all paid well above the minimum wage threshold and are managed in accordance with Fair Work Australia requirements.

Our Projects

The construction works on our projects are performed by suppliers engaged by MPA Construction Group. Any new suppliers for construction projects must undergo an accreditation process, where they are assessed in various stages to verify that they are financially viable, able to meet WHS requirements, Supplier Code of Conduct, and meet the commercial, policy and operating requirements set out by MPA including modern slavery contract terms.

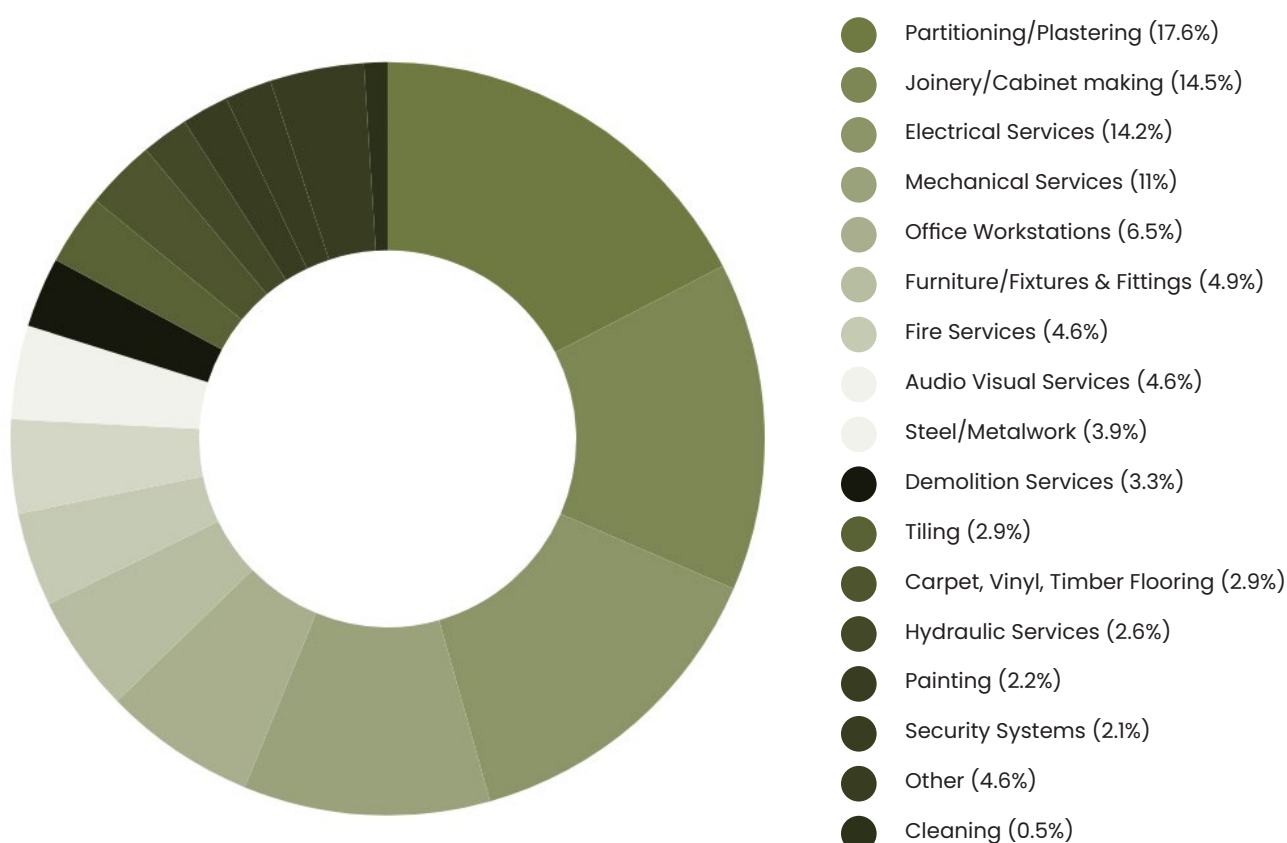
The bulk of project activity occurs in the CBD and metro areas of both Sydney and Melbourne. Some occasional project work is conducted in other locations such as Perth, Canberra and Brisbane as well as smaller cities such as Wollongong and Newcastle.

MPA Holdings (Aust.) Pty Limited holds Lots in a commercial office investment property that it holds in 80 Cooper St, Surry Hills NSW.

2.3 Supply Chain

MPA's suppliers are predominantly located within Australia, although some suppliers may procure material items from overseas locations. Very rarely will MPA procure direct from overseas suppliers.

For the financial year 2023/24, MPA's procurement spend was approximately \$168M. The distribution of this spend through our suppliers of construction materials, design and construction services is shown below:



During the Reporting Period, we also procured goods and services to support our office operations. These included insurance, travel, office rent (including utilities), telephone, professional services, IT services, legal services, IT hardware, software licenses, training, PPE and corporate merchandise.

3.1 In our operations

In previous reporting periods, we assessed our potential connection to adverse human rights impacts by reference to the UN Guiding Principles on Business and Human Rights. Given that our operations have remained largely unchanged over the years, we remain of the view that it is unlikely that MPA has “caused” or “contributed” to modern slavery risks in our operations. Our assessment is based on the following reasons:

1. Our employees are all located in Australia, a country with a lower prevalence of, and vulnerability to, modern slavery risks according to the Global Slavery Index.¹
2. Most of the roles performed by our employees are by tertiary qualified professionals and skilled workers.
3. We comply with all industrial relations laws and regulations.
4. Employees are paid at least award wages and all are paid above minimum wage.

3.2 In our supply chain

Labour hire, materials and construction services remain the main areas of where we may be linked to modern slavery risk in respect of our supply chain. In terms of the risks in the supply chain supporting our head office operations, there are inherent risks of modern slavery in office supplies, IT and telecommunications equipment and corporate merchandise.

As noted previously, the majority of our suppliers are based in Australia. However, we recognise that our suppliers are likely to source products from overseas which in turn creates risk in our own supply chain (both as a result of risk arising from where they were manufactured and also the process of transporting the products to Australia). The risks are heightened in relation to the materials used in the construction sector where the sourcing of raw materials and the manufacturing of products often occurs in countries where there are increased risks of forced labour, debt bondage, worst forms of child labour and other forms of modern slavery. Other factors that increase the risk profile for modern slavery in the construction sector are as follows:

1. prevalence of outsourcing for low-skilled labour
2. contract terms with low margins and significant pressure on delivery times
3. reliance on a migrant workforce with limited English competency and temporary visa arrangements

1. We note that the 2023 Global Slavery Index estimates that approximately 41,000 people living in modern slavery on any given day in 2021. This demonstrates that modern slavery occurs even in developed nations like Australia.

4. multiple sub-contracting arrangements with informal agreements
5. low barriers for entry for labour hire providers
6. dangerous or substandard working conditions, including:
 - workers who are not paid fairly or withheld entitlements
 - workers who may be required to work excessive hours
 - workplace safety concerns

We recognise the complexity of the global supply chains supporting our business and the importance of gaining greater visibility beyond the first tier of our supply chain.

The United States Government's Bureau of International Labor Affairs (ILAB) maintains a list of goods and their source countries which it has reason to believe are produced by child labour or forced labour in violation of international standards (List of Goods). The List of Goods comprises 168 goods from 80 countries, as of September, 2024. Many of the products in the List of Goods are relevant to the supply chain of building materials, for example, bricks, furniture, glass and timber from countries such as Afghanistan, Bangladesh, Brazil and China (to name a few). Furthermore, the List of Goods includes minerals such as tantalum, tin ore, tungsten and cobalt found in most technology products including smart phones, laptops, batteries.

Entities involved in the production of PVC products, used in vinyl flooring, which are linked to the manufacturers in the Xinjiang Uyghur Autonomous Region (Xinjiang Region) are listed in the US Uyghur Forced Labour Prevention Act Entity List (UFLPA Entity List). The UFLPA Entity List is a consolidated register of entities which implicated with the mining, production or manufacturing of products made with forced labour in the Xinjiang Uyghur Autonomous Region. The UFLPA Entity List also includes entities linked to the Xinjiang Region which produce construction materials such as silicon, steel, aluminium and solar panels, with PVC products being identified as a high-priority sector for enforcement in 2024. This has meant that luxury vinyl tiles (LVT) produced in the Xinxiang region or by entities on the UFLPA Entity List cannot be imported into the US and are detained by customs unless the importer can prove that the goods were not made with forced labour and that the importer has fully complied with due diligence requirements. LVT planks are commonly used in our projects and we source these products from Australian retailers. However, we recognise that Australian retailers are likely to source from global manufacturers that may be implicated in the production or sourcing of materials from the Xinxiang Region.

Based on our review of questionnaire responses in previous reporting periods, the vast majority of our direct suppliers also source their component parts from Australian businesses. However, as noted above, it is likely that those suppliers source some or all of their products from overseas providers who are also likely to be a number of layers removed from the sourcing of raw materials. As a result, theoretical mapping of our supply chain would suggest that we may be linked to modern slavery, such as forced labour, debt bondage and the worst forms of child labour, beyond the fourth tier of our supply chain.

Case Study – Supply chain due diligence

During the Reporting Period, we commenced the roll out of a third-party platform to undertake due diligence into our supply chains. The platform is used by several companies operating within the property sector in Australia. Users of the platform can access supplier responses to questionnaires where suppliers provide goods or services in common.

In conducting a preliminary review of the supplier responses to the questionnaire, we identified one Australian supplier of window coverings was a distributor of imported third party products containing high-risk metals, such as copper and aluminum. Although the supplier itself came up as low risk, the products they import and sell to customers in Australia have higher risks of modern slavery by virtue of the raw materials. Copper is listed on the List of Products Produced by Forced or Child Labour (TVPR List) published by the U.S. Government, due to downstream risks associated with copper ore mining in the Democratic Republic of Congo (DRC). The 2024 TVPR List Report cited investigations that have identified that children have been involved in the mining, collection, crushing, and washing copper ore in DRC's artisanal and small-scale mining sector. The majority of the copper ore produced in the DRC, including ore mined by children, is imported into China for further refining.² Aluminum was added as a risk product in 2024 due to reports of forced labour involving Uyghurs and other Muslim ethnic groups in the Xinjiang region in China.

Based on the questionnaire response, the supplier had not conducted modern slavery due diligence in relation to the products sourced for distribution in Australia. Despite the absence of adequate measures to assess the salient risks of modern slavery, the supplier was categorised by the platform as low risk. This was an important reminder of the need for us to look beyond automated results and to interrogate the potential risks of modern slavery in the supply chain of our suppliers, particularly those distributing products that are likely to have higher risks of modern slavery.

2. 2024 List of Goods Produced by Child Labor or Forced Labor, U.S. Government Office of Child Labor, Forced Labor and Human Trafficking: https://www.dol.gov/sites/dolgov/files/ilab/child_labor_reports/tda2023/2024-tvpra-list-of-goods.pdf

The actions taken to assess and address modern slavery risks in previous years are set out in Annexure A for completeness and we have set out below the actions we took during FY23/24.

The actions we have taken to meet our goals as described in our last statement are described in part 4 of this statement, which explains how we assess the effectiveness of our actions.

4.1 Risk assessment and approach to remediation

During the Reporting Period we engaged a third-party risk platform to support our efforts in conducting supplier due diligence for modern slavery risks. The roll-out of the platform was one of our goals for FY2023. Our aim in future reporting periods is to increase the supplier population registered on the platform, analyse the results of the questionnaires, and engage with suppliers requiring further diligence.

During the Reporting Period, we did not receive any reports of actual or suspected instances of modern slavery in our operations or supply chains. In the event that our business is found to have caused or contributed to an actual instance of modern slavery, our immediate priority would be the safety and wellbeing of the victim and then to work with the supplier(s) in question to facilitate change of practices to minimise the risk of future recurrence. Specific remediation activities would be determined on a case-by-case basis to ensure the most appropriate and effective actions are undertaken.

We understand that an effective and accessible whistleblowing mechanism is an important element to remediation. We have considered our Whistleblowing Policy in the context of the UN Guiding Principles on Business and Human Rights (UNGPs). An overview of our high level review is set out below:

- **Protect** – The second pillar of UNGPs articulates the corporate duty to protect human rights, which includes ensuring that businesses operate in a manner that respects human rights. The MPA Whistleblowing Policy provides a mechanism for employees and other stakeholders to report human rights abuses or unethical practices without fear of retaliation. This contributes to MPA giving effect to its duty to protect human rights by encouraging transparency and accountability within our business.
- **Respect** – MPA have a responsibility to respect human rights, meaning we should avoid infringing on the rights of others and address adverse impacts with which we are involved. Our Whistleblowing Policy seeks to uphold these principles by establishing and maintaining a channel for reporting and promoting a culture of respect for human rights.

- **Remedy** – The UNGPs highlight the need for access to effective remedies when human rights are violated. We remain committed to providing remedy where we have caused or contributed to adverse human rights impacts. Grievance mechanisms are the cornerstone to remediation. They provide a procedure through which a grievance can be raised by affected workers, assessed, investigated, and responded to. Our Whistleblowing Policy sets out the process once a disclosure is made, including the approach to investigation.

4.2 Recruitment

MPA's recruitment processes continued to ensure that:

1. Hiring is via registered recruitment agencies or direct placement, or employee referrals (standard interview practices are followed in either instance).
2. All employee are of the minimum age. Child labour is not to be used under any circumstances.
3. Processes are in place to check that all workers are working of their own free will (i.e. there is no slavery or servitude, forced or compulsory labour or trafficked labour).
4. MPA pays employees through electronic payroll systems.
5. All new hires must submit proof of work rights by either submitting a copy of their passport or birth certificate. If the new hires are on working visas, we conduct VEVO checks.
6. All candidates who are successful through the hiring process are offered employment which they have the opportunity to voluntarily accept by signing an employment agreement with MPA.
7. All new starters are required to complete the Modern Slavery Training module.

MPA recognises the need to review the processes in place to assess modern slavery risks and to adjust those process as and when required to ensure that it is responsive to emerging risks both in Australia and abroad and the potential impacts on our supply chain.

Responsibility for designing, implementing and assessing the effectiveness of our modern slavery program sits with MPA's Commercial & Procurement Director.

During the Reporting Period, we tracked our progress against the goals that we set for ourselves in 2023/2024 as outlined below. During the next reporting period, we endeavour to progress the goals set out in the table below.

5.1 Modern slavery goal tracking

No.	Goals for 2023/2024	Status/progress during 2023/2024	Actions for FY2024/25
1	Deploy an automated platform to assist with supply chain due diligence	Completed	Continue to embed the utilisation of the platform by employees with a procurement function
2	Review the results of the due diligence produced via the automated platform and identify the suppliers requiring further due diligence and prepare corrective action plans where needed	In progress	Continue to monitor the results available on the platform and undertake further due diligence where required
3	Provide modern slavery and supplier code of conduct awareness training for suppliers	Paused	Progress the development of supplier training
4	Develop a process to verify compliance with the supplier code of conduct and modern slavery contract terms	Paused	Progress the development of a verification process
5	Align MPA's revised whistleblower channel and grievance mechanism to the UNGPs	Commenced	Consider whether the Whistleblowing Policy should be made available on our website to improved accessibility for stakeholders

We will seek to assess the effectiveness of our actions by tracking against the above goals for FY2024/25 and report on our progress in our next Modern Slavery Statement.

This report was produced in consultation with our Finance and People and Culture Department. We have consulted with our owned or controlled entities in the development of this statement.

This statement was approved on 29 November 2024 by the board of MPA Holdings (Aust.) Pty Limited which is the principal governing body of the reporting entity, and it has been signed by the responsible members of the body, Benjamin Ritchie and Edward Singleton, in their capacity as Chairman and CEO respectively on the same date. The responsible members are also the same directors for each of the subsidiaries of the reporting entity.



Benjamin Ritchie
Founding Director
Date: 29 November 2024



Edward Singleton
Founding Director
Date: 29 November 2024



Annexure A

1.1 Risk assessment

In the early years of reporting, we conducted a desktop risk assessment of our first tier suppliers by reference to a modern slavery risk matrix provided to us by experts in the field of business human rights. The risk matrix allowed us to review our suppliers through the lens of industry and jurisdictional risks as well as identifying the risks associated with products linked to child and forced labour as contained in the List of Goods. The suppliers from the Reporting Period that provided goods and/or services from industries with higher modern slavery risks included:

1. Cleaning
2. Glass and Glass Product Manufacturing
3. Ceramic Product Manufacturing
4. Cement, Lime, Plaster and Concrete Product Manufacturing
5. Fabricated Metal Product Manufacturing
6. Waste Collection, Treatment and Disposal Services
7. Basic Material Wholesaling

The above desktop approach subsequently evolved with the implementation of a Modern Slavery Risk Assessment embedded within our Supplier Accreditation Program in 2023 (see below). As part of this process, we issued questionnaires to suppliers to assess modern slavery red flags within the operations and supply chains of our suppliers. Following the recommendation arising from the ESG review conducted in collaboration with one of our key clients, we took the next step in maturing our approach to modern slavery risk assessment by deploying an automated supplier assessment platform in 2024.

1.2 Supplier accreditation program

All suppliers that intend to or have worked for MPA on a construction project are required to have successfully completed our accreditation program and then remain accredited which is reviewed every 12 months.

The supplier accreditation is a program that pre-qualifies our suppliers across numerous key attributes and benchmarks, these include:

1. Corporate Structure
2. Ownership
3. Trading History
4. Financial Capacity
5. Insurance Coverage
6. Indigenous Procurement
7. Modern Slavery
8. Capability and Capacity
9. Resourcing
10. Supplier Code of Conduct
11. Corporate Compliance
12. Industrial Relations
13. Human Resources and staffing
14. WHS, Quality and Environmental Systems compliance
15. NCOP Compliance

By incorporating the above requirement, our aim is to communicate our commitment to only work with suppliers that are aligned to our values.

In Victoria, all labour hire providers must be licensed. When engaging with Victorian labour hire providers, we continued to undertake checks to ensure that they are licensed.

Sydney

Level 12, 50 Goulburn Street, Sydney NSW 2000
T +61 2 8202 7300 | E enquiry@mpa.com.au

Melbourne

Level 2, 99 King Street, Melbourne VIC 3000
T +61 3 9077 7684 | E enquiry@mpa.com.au

Brisbane

Level 3, 240 Queen Street, Brisbane QLD 4000
T +61 7 3535 1232 | E enquiry@mpa.com.au

