

# leed

making a difference

## Modern Slavery Statement

### FY2025

ABN 35 097 021 728



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## Introduction

### A message from our Chief Executive



The Leed Group of companies is committed to working with our clients to deliver sustainable infrastructure that enriches communities and creates a better tomorrow.

To achieve this goal, we are dedicated to the highest standards of business ethics, and to

addressing human rights abuses and the risks of modern slavery in our business and supply chains.

This document has been approved by the Board of Directors and applies to the 2025 Financial Year and addresses our important obligations under the Australian Modern Slavery Act 2018 (Cth).

It describes the progress we have made towards our commitment to address modern slavery risks and outlines the procedures we have in place. It also summarises our performance on actions over the last year and sets out our plans over the next 12 months to improve our processes and continue to contribute to driving change within our industry.

**Craig Laslett**  
Chief Executive Officer  
Leed Group of Companies

### Acknowledgement of Country

The Leed Group acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to the land, waters and community. We pay our respects to them and their cultures; and to Elders past and present.

We commit to continue listening and learning from First Nations voices and to working in partnership to create better experiences together for a better tomorrow.

### What is modern slavery?

Modern slavery is an umbrella term that includes forced labour, human trafficking, debt bondage, forced or servile marriage, and the sale and exploitation of children.

What these concepts have in common is that the victims are in situations of exploitation which they cannot refuse or leave because of threats, violence, coercion, abuse of power, or deception.

The Global Estimates of Modern Slavery report by the International Labour Organization (ILO), Walk Free, and the International Organization for Migration found that:

- modern slavery affects every region and country of the world
- of those in forced labour, 11.8 million are women and 3.3 million are children
- most forced labour occurs in the private economy, with the principle industries being manufacturing, construction, agriculture (excluding fishing), services and domestic work
- migrant workers are over three times more likely to experience forced labor compared to non-migrants
- the Asia-Pacific region accounts for the highest number of people in modern slavery globally.

## Criteria 1 and 2

### Reporting entities

#### The reporting entity

This Modern Slavery Statement is made on behalf of Leed Engineering and Construction Pty Ltd (Leed) in accordance with the Australian Modern Slavery Act 2018 (Cth). It has been approved by the Board of Directors of reporting entity Leed Engineering and Construction Pty Ltd and applies to the reporting period 1 July 2024 – 30 June 2025.

Leed Engineering and Construction Pty Ltd (ABN 35 097 021 728) is the reporting entity under the Modern Slavery Act 2018 (Cth). Leed is a privately owned engineering and construction company specialising in sustainable civil infrastructure projects across Australia. Leed owns and controls several entities, including Leed Plant Pty Ltd, Leed Holdings Pty Ltd, LGI Holdings Pty Ltd, AC Rental Pty Ltd, Ecospec Pty Ltd, and NWIC Pty Ltd. These entities form part of the Leed Group but do not independently meet the reporting threshold under the Act. Leed employs over 300 staff across four offices and self-performs a significant portion of its project delivery, supported by a robust management system and local supply networks.

Following feedback from the Attorney-General's Department in relation to Leed's FY2024 statement, this updated statement explicitly details the consultation undertaken with entities owned and controlled by Leed Engineering and Construction Pty Ltd, ensuring full compliance with section 16(1)(f) of the Modern Slavery Act 2018 (Cth).

#### Operations

Leed is a privately-owned group of engineering and construction companies delivering key infrastructure projects and recognised for our particular expertise in the water sector. Founded in South Australia in 2001, we grew rapidly to become a national civil infrastructure contractor, delivering projects throughout metropolitan, regional and remote areas of Australia.

Our project growth into other states led to us opening offices in Bendigo in 2007, Melbourne in 2009 and Cooma in 2020. Leed now has over 300 staff and an extensive fleet of plant and equipment that allow us to self-perform on the majority of our projects. We have an excellent reputation for delivering projects on time and working in a collaborative way with clients, stakeholders and the wider community. Our experience, capability, financial stability, proven team and outstanding track record make Leed an ideal partner for complex infrastructure projects.

## Supply chain

Leed procures a broad range of goods and services, including specialist subcontracting, plant and equipment, materials, personal protective equipment, labour hire, IT and communications, cleaning and catering services, and professional consulting. While most suppliers are Australian-based, some imported goods and materials originate from international jurisdictions through third-party distributors, including the Asia-Pacific region. Leed recognises these tiers as areas for continued due diligence focus.

During the financial year ending 30 June 2025, Leed procured a range of goods and services including:

- professional services, specialist subcontractors and trades
- construction equipment and machinery
- raw construction materials including pipes, valves, fittings, pre-cast concrete structures, asphalt, fill, etc.
- mobile fleet of heavy equipment and vehicles, including parts
- personal protective equipment and clothing
- cleaning and security services
- mechanical and electrical equipment
- office equipment and stationery
- energy and utilities
- information technology equipment and services
- labour hire
- fuel
- accommodation
- food and beverages.

**Founded  
2001**

**4  
Offices**

**300+  
Staff**

**1000+  
Suppliers**

## Criterion 3 Risks

### Operational risk

We recognise that by virtue of our direct employment of many workers, Leed may cause, contribute to or be directly linked to modern slavery risks. However, we believe the risk of modern slavery in our workforce is low due to our highly developed management systems and our strict compliance with regulations and employment laws.

### Supply chain risk

Leed only delivers projects within Australia. We have a strong emphasis on the engagement of local small to medium enterprises and the use of products and supplies that are locally manufactured or purchased through local suppliers who comply with all required legislation and regulations. This minimises the supply chain risks of modern slavery as well as maximising investment into the local economy.

As the majority of Leed's direct suppliers are based in Australia, a low-risk jurisdiction for modern slavery, we believe that the risk of modern slavery in our supply chain is low, but we acknowledge that risks may exist in the second and subsequent tiers of our supply chain.

### Sector risks

Leed acknowledges that certain sectors within its operations and supply chains carry a higher risk of modern slavery, including cleaning, PPE, labour hire, and IT procurement. Although the majority of suppliers operate in low-risk jurisdictions, the company continues to assess second- and third-tier risks through supplier mapping, questionnaires, and review of public risk indices. Examples include:

- food services
- cleaning services
- medical, PPE and workwear supply
- IT and telecommunications equipment
- stationery supply
- casual labour hire.

## Criterion 4

### Mitigating risks

#### STATUS EOFY25

Leed takes a structured approach to identifying and mitigating modern slavery risks. Key actions include supplier due diligence, contractual clauses requiring compliance with modern slavery laws, employee training, and regular policy reviews.

Leed manages modern slavery and human trafficking risks in our supply chain by:

- 03 recognising our modern slavery commitments and obligations at a corporate policy level
- 03 ensuring that all employees have a written contract of employment that explains our employees' rights and entitlements at law
- 03 identifying and working with companies that are known to us and that have standards that are aligned with our own
- 03 using subcontractor declarations to ensure alignment with subcontractors and identify potential risks
- 03 managing subcontractors and suppliers in accordance with our highly developed, accredited management systems
- 03 establishing clear expectations with our supply chain
- 03 conducting due diligence reviews of suppliers
- 03 incorporating terms and conditions relating to modern slavery in awarded contracts. Our contracts specifically require our suppliers to act in accordance with all relevant legislation and regulations
- 03 conducting reviews of suppliers during performance to identify potential issues.



#### COVID-19 considerations

We recognise that while the impacts of the COVID-19 pandemic have largely lessened, it continues to present potential risks related to modern slavery through restricted supply chain options, extended timeframes and increased challenges in conducting due diligence and supplier assessments.

Leed's managed approach to COVID-19 considers procurement and supply chain issues including modern slavery and is subject to continuous improvement in order to mitigate the impacts of the pandemic on our ability to meet our modern slavery commitments.



## Initiatives

Leed will:

-  update its suite of Corporate Policies to better address modern slavery, outlining Leed's commitment to preventing, identifying and reporting modern slavery risks within our operations and supply chains
-  updating our Whistleblower Policy and its associated reporting mechanisms to allow anonymous reporting of concerns about Modern Slavery and human rights
-  revise existing subcontractor agreements/contracts to expand upon our expectations with regard to modern slavery
-  continue to develop new tools and offer relevant training to all employees
-  undertake modern slavery training for all employees to assist in identifying practices which may constitute modern slavery, manage risks and ensure compliance.

## Criterion 5

### Assessing effectiveness

Leed evaluates the effectiveness of its actions through measurable indicators, including: the proportion of suppliers completing declarations (target >90%), number of staff trained, and supplier audit outcomes. Results and progress are reported quarterly to the Board's Risk and Compliance Committee.

We recognise that this is a continual journey and our efforts to address modern slavery across our business and supply chains and are still developing our systems and processes to assess and mitigate modern slavery risk.

Over the next 12 months we will continue to extend and improve our existing accredited systems to better address modern slavery and to assess the effectiveness of our approach.

#### STATUS EOFY24



This will include:

- 02 reviewing and revising our Code of Conduct to clarify our standards for our suppliers in relation to modern slavery, human rights, sustainability and other relevant issues
- 02 development of Ethical Procurement Policy / Procedure
- 02 a review of project management templates to ensure consistency with Leed's corporate policy updates addressing modern slavery
- 02 leveraging our existing internal incident reporting and audit processes to also examine operational and supply chain modern slavery risks
- 01 improving our supplier engagement processes and contracts
- 01 the establishment of a Modern Slavery Risk Register
- 01 assessing the possibility of establishing Key Performance Indicators for modern slavery reporting.

Other initiatives to ensure the effectiveness of our actions include:

- 03 regular, ongoing reporting to the Leed Board on modern slavery risks and compliance
- 01 a survey of Leed's suppliers to identify potential risks of modern slavery and regulatory non-compliance
- 01 project self-assessments.

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## Criteria 6 and 7

### Consultation/Other information

#### Consultation with Controlled Entities

In preparing this statement, Leed Engineering and Construction Pty Ltd consulted with the management teams of its controlled entities – Leed Plant Pty Ltd, Leed Holding Pty Ltd, LGI Holdings Pty Ltd, AC Rental Pty Ltd, Ecospec Pty Ltd, and NWIC Pty Ltd. Consultation occurred through internal meetings and correspondence coordinated by Leed’s Corporate Services and Compliance teams. Each entity provided information about their operations, procurement practices, and supplier relationships. Feedback from these entities informed the preparation of this statement. Leed will continue to engage with its controlled entities to ensure alignment across group policies and processes.

#### Approval

This Modern Slavery Statement was approved by the Board of Directors for the principal governing body and the reporting entity in Leed Engineering and Construction Pty Ltd, on December 17th 2025.



**Andrew Millar**  
Board Chair  
Leed Engineering and Construction Pty Ltd

“  
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business ethics, and to addressing human  
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in our business and supply chains.”

**leed**

ADELAIDE • BENDIGO • COOMA • MELBOURNE

**SOUTH AUSTRALIA**  
95 King William Street  
Kent Town SA 5067  
T 08 8132 1044

**NEW SOUTH WALES**  
3 Sharp Street  
Cooma NSW 2630  
T 0408 166 724

**VICTORIA**  
Suite 2, Level 2, 17 Everage Street  
Moonee Ponds VIC 3039  
T 03 9374 3311

76 Collins Street  
Kangaroo Flat VIC 3555  
T 03 5447 0511