

Modern Slavery [Modern Slavery Act 2018 (Cth)] Reporting Period FY2025

Introduction

Modern slavery is an umbrella term, which encompasses several types of human exploitation. Practices that can constitute Modern Slavery are:

- human trafficking
- slavery
- servitude
- forced labour
- debt bondage
- forced marriage, and
- the worst forms of child labour

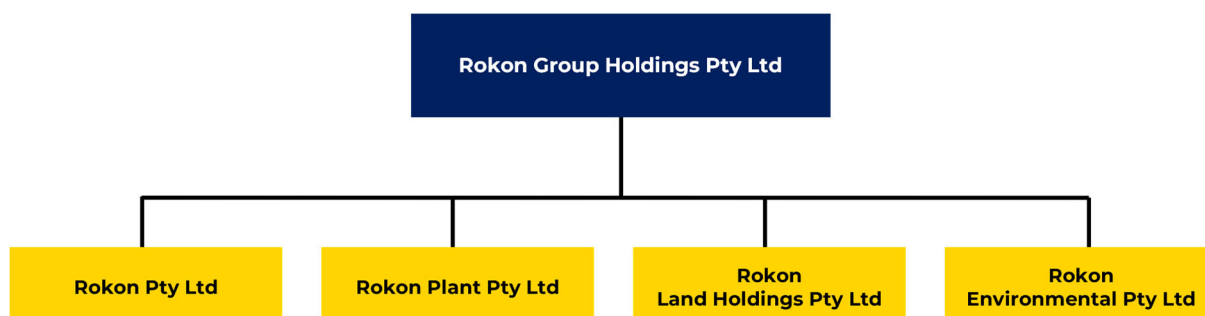
The Rokon Group understand the risks of modern slavery sits within its industry and is strongly committed to respecting and promoting human rights. We continuously work towards identifying and eradicating modern slavery in our operations and our supply chains. Rokon Group continues to raise awareness of the risks of modern slavery in its operations and supply chains to all stakeholders and to promote the ethical, diligent, and responsible delivery and procurement of goods and services in its business. Our Procurement and Compliance teams regularly review the Australian Government recommendations and UN reports to determine if there are any increased risks within our supply chains that require active intervention by Rokon.

Business Entity Structure

Rokon Group Holdings Pty Ltd (**Rokon Group Holdings**) and Rokon Pty Ltd are both Reporting Entities under the *Modern Slavery Act 2018* (Cth) and remain the only Reporting Entities within the Rokon Group.¹

Rokon Group Holdings is the parent entity of Rokon Pty Ltd, Rokon Plant Pty Ltd, Rokon Land Holdings Pty Ltd and Rokon Environmental Pty Ltd - please see structure diagram below.

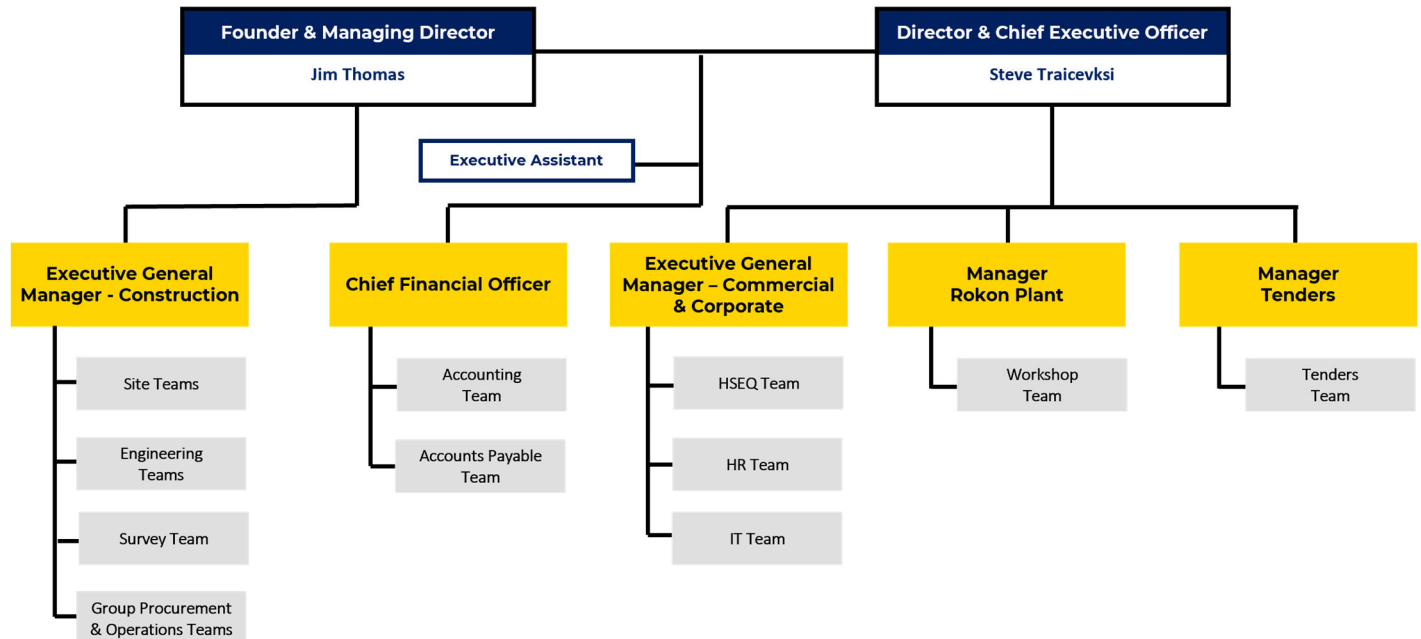
All Rokon Group entities are incorporated in Australia and have their registered offices in Melbourne, Victoria.



¹ In this statement, the collective expressions “we”, “our”, “Rokon”, and “Rokon Group”, are used when we refer to Rokon Group Holdings and any entities which it owns or over which it has control. This is because we operate using group-wide policies and procedures to assess and manage modern slavery risks.

Management Structure

The Rokon Group is wholly owned by co-owners who perform the roles of directors who are supported by a senior management team who provide advice on business operations. See organisational structure below.



Operations

All Rokon Group business entities operate solely within Australia in civil and infrastructure construction for residential property developers, commercial property developers, private landowners, local authorities, and state government agencies.

As at 30 June 2025, the Rokon Group employed 225 people.

The following activities are undertaken by Rokon Pty Ltd:

- I. Management, construction, and the delivery of civil construction solutions including:
 - a. Residential Subdivisions and Utilities Services
 - b. Commercial & Industrial Subdivision infrastructure and Services
 - c. Roads & Intersections
 - d. Land remediation
- II. Direct employment to carry out services in delivering the above:
 - a. Administration Services
 - b. Professional Services
 - c. Civil Construction and Management Services
 - d. Operation of earthmoving Plant & Equipment
 - e. Civil Construction labour

Rokon Plant Pty Ltd owns and hires plant & equipment to Rokon Pty Ltd.

Rokon Environmental Pty Ltd owns crushing plant and equipment (pugmill) and sources spare parts repairs & maintenance services.

Rokon Group Holdings and Rokon Land Holdings Pty Ltd, are holding entities and have no other operations.

Supply Chain

Rokon Group Holdings and Rokon Land Holdings, are holding entities and have no operating supply chains.

The supply chain of Rokon Pty Ltd, Rokon Plant Pty Ltd, and Rokon Environmental Pty Ltd includes the manufacture and transportation of products to project sites to aid the completion of civil construction projects. The majority of supply chain spend during this reporting period for all entities was on road pavement materials and cartage/logistics.

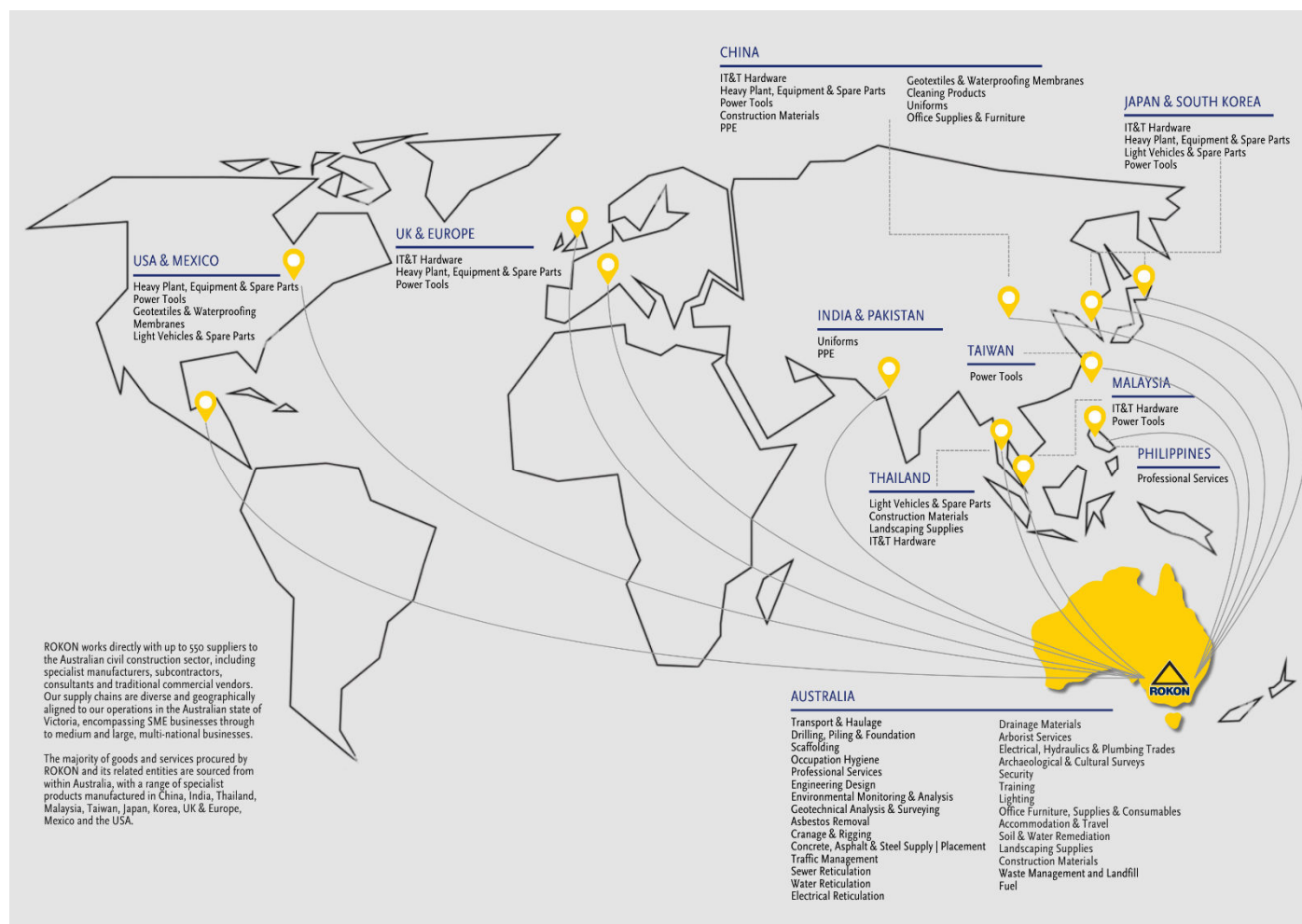
Examples of products sourced by Rokon, Rokon Plant and Rokon Environmental (internal recycling) include heavy plant items such as excavators, spare parts, delivered crushed rock, concrete, asphalt, soil materials, electrical conduit, uniforms & PPE, traffic management infrastructure, PE pipes and temporary fencing amongst other product and plant requirements.

Examples of services procured by Rokon, Rokon Plant and Rokon Environmental include professional services such as cartage and logistics services, heavy plant hire, labour hire services, management/consultancy services, electrical reticulation, water mains reticulation, sewer mains reticulation, repair and maintenance services, amongst other services required.

A minor percentage of products are indirectly sourced from overseas through local suppliers importing into Australia. For example, we use local suppliers to provide parts and accessories for our heavy equipment maintenance and repair needs. These are supplied and installed to design specifications either by our maintenance team or by local subcontractors, however the components for such are procured from OEM suppliers overseas.

All suppliers of products or services to Rokon Group are required to comply with our supplier onboarding process. This ensures compliance with Rokon company policies, modern slavery awareness & actions and that operations remain within the confines of all Australian laws and regulations.

Global Supply Chain Map – Rokon Group



Risks of Modern Slavery Practices in the Operations and Supply Chain

The Rokon Group has conducted an assessment on the risks of modern slavery involved in its operations and supply chain.

As Rokon Group comply and conform to the laws and requirements of the labour market in Australia, it has been determined that the risk of modern slavery existing within the Rokon Group's operations remains very low.

To supplement occasional increased or specialist workforce resource needs, labour hire agencies may be engaged. These are subject to the same rigorous onboarding requirements as all other suppliers, however it is acknowledged that there may be a low level risk associated with these agencies. Rokon Group expects conformance to the Australian laws that regulate their employment agreements but can only assessed on the basis of compliance with our aforementioned onboarding process.

Rokon Group recognises there may be increased risks associated with sourcing goods manufactured or procured from overseas countries. Key geographical regions identified as high risk pertinent to goods and services procured by Rokon include South East and Western Asian countries. Some countries in these regions may be subject to less rigorous industrial practices and therefore may be susceptible to some instances of modern slavery and exploitative practices such as forced labour, child labour and human trafficking.

To assist with reviewing risk factors for Modern Slavery in the Rokon Group supply chain, Rokon Group utilises www.walkfree.org reports and findings such as the Global Slavery Index to assists in our assessments of risk factors for imported goods and services as detailed in above map.

Risk Mitigation and Improvement

All existing and new suppliers and subcontractors are required to complete a self-assessment questionnaire as part of the Rokon Group prequalification process. This questionnaire ensures all suppliers are aware of and familiar with modern slavery concerns and demonstrates to the Rokon Group their level of understanding of same. Any supplier who is assessed as potentially high risk (i.e. may have undocumented instances of modern slavery OR is underestimating the risk of modern slavery acts occurring) will not attain prequalification.

As at publication of this statement, Rokon is not aware of any incidences of modern slavery in its operations or supply chains during the reporting period. In the instance a future issue becomes known, an investigation will be conducted, and remedial actions will be implemented.

Remediation Processes

1. Immediate cessation of engagement with the supplier.
2. Review and amendment to existing procedures.
3. Review of similar suppliers to identify if similar risks are identified in respect of such suppliers and their supply chain.
4. If appropriate, the preparation of a communication to all suppliers to flag the risk in an attempt to ensure that the issue does not occur again.
5. If appropriate, re-publish the Rokon Whistleblower contact details to encourage reporting by Rokon employees and associates of Rokon.

Broader Actions

Rokon Group has taken and continues to take steps to identify and report the risks outlined above, conduct regular reviews and where necessary, redress through corrective actions.

Rokon Group have implemented in our procurement practices across all business entities actions to reduce the risk of Modern Slavery.

Rokon Group has appointed its Procurement team to assess any high-risk situations in relation to each business entity. Group Procurement are responsible for the administration and implementation of these processes and redress where necessary.

Modern Slavery Policy

Our Modern Slavery Policy supplements the existing employee code of conduct and whistleblower policies. The Policy identifies and sets out the actions that will be taken to identify, assess and address the risk of modern slavery in Rokon Group's operations and supply chains. This Policy will be regularly reviewed and updated as identified through our regular audits.

The Policy applies to all personnel working for and / or providing goods and services to any business entity within Rokon Group.

The Policy is available to employees via their individual Inductee onboarding information and will again be included in a regular Rokon Group internal newsletter sent to all employees to serve as a reminder of the Policy.

Supplier onboarding procedures currently require each supplier to acknowledge that it understands and will adhere to the Rokon Group Modern Slavery policy.

Supplier Modern Slavery Questionnaire

To avoid indirectly engaging in modern slavery practices, all existing and new suppliers within the Rokon Group are required to be made aware of their obligations in their own supply chain to meet the Modern Slavery Policy

by completion of a Supplier Onboarding questionnaire. Rokon Group has implemented this questionnaire to existing suppliers to cover the following matters:

- a) *Modern Slavery Act 2018* (Cth) awareness.
- b) verification that the supplier is not involved in any modern slavery practices
- c) verification that the Supplier, if encountering an act of modern slavery, has a remediation process to properly correct the situation
- d) verification that the Supplier is familiar as to the modern slavery risks in their operations and supply chain.
- e) A requirement that the Supplier communicates any acts it identifies in its own supply chain(s).

Upon supplier onboarding, reviews are conducted to identify any potential high risk supplier profiles in every instance.

Major Works Subcontractor Agreements

All Major Works subcontractor agreements include a clause addressing modern slavery risks to the *Modern Slavery Act 2018*.

Effectiveness

During this reporting period, we have continued our efforts in respect of effectiveness on the supplier onboarding process and developing an audit system to ensure the supply onboarding process is effective. This process requires annual audits to be conducted within our Management Review cycle to ensure all supplier modern slavery risks have been identified within the Supplier onboarding system Rapid Global, and subsequently considered by management.

The results of these audits are used to inform improvements or amendments to the process to ensure modern slavery risk is accurately identified.

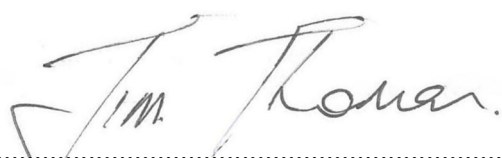
We continue to work on developing frameworks and processes to ensure we can review the effectiveness of the other actions we are taking to assess and address modern slavery risks in our operations and supply chains.

Consultation with Business Entities

Rokon Group Holdings has collaborated with Rokon Pty Ltd, Rokon Plant Pty Ltd, Rokon Land Holdings Pty Ltd and Rokon Environmental Pty Ltd in the development of this statement. Rokon Group objectives and strategies are established annually and reviewed on a quarterly basis, to ensure Board and Executive team members from all entities are consulted and are addressing the effectiveness of any remedial actions to address identified risks.

Approval

This statement has been approved by the Board of Rokon Group Holdings as the higher entity under s 14(2)(e)(ii) and is signed by both Directors.



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