

**McCONNELL
DOWELL**

CREATIVE CONSTRUCTION™

Modern Slavery Statement

Reporting Period: Financial Year 2024-2025



Introduction

Modern slavery is a grave violation of human rights that affects over 40 million people globally.

Modern Slavery is a serious violation of a person's basic human rights estimated to affect over 40 million people globally. It involves using coercion, threats or deception to exploit a worker for commercial gain - undermining their freedom. Modern Slavery includes the following types of serious exploitation: trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting and child labour.

The construction sector faces an elevated risk of Modern Slavery within its operation and supply chain as a result of intersecting structural and contextual risk factors. It is estimated that 16% of adults (or 2.8 million people) experiencing forced labour worldwide work in the construction services sector.

McConnell Dowell recognises that we are exposed to potential Modern Slavery risks within our operations and supply chain, and we are committed to identifying, preventing, mitigating and remediating those risks, consistent with:

- our purpose of providing a better life
- the guiding principles of the United Nations Global Compact
- the United Nations Sustainable Development Goals

This statement is made pursuant to the Commonwealth Modern Slavery Act (2018) (the Act) for the year ended 30 June 2025 (Reporting Period) and was approved by the board of directors of Aveng Australia Holdings Pty Ltd for and on behalf of the Reporting Entities and the board of directors of McConnell Dowell Corporation Ltd on 31st December.

This statement relates to the following entities in the McConnell Dowell group:

- McConnell Dowell Corporation Ltd
- McConnell Dowell Holdings Pty Ltd
- McConnell Dowell Constructors (Aust) Pty Ltd
- Built Environs Pty Ltd

and the ultimate Australian parent company of McConnell Dowell (Aveng Australia Holdings Pty Ltd), which each carried on business in Australia with a consolidated revenue in excess of \$100 million in the financial year, and their owned or controlled entities.



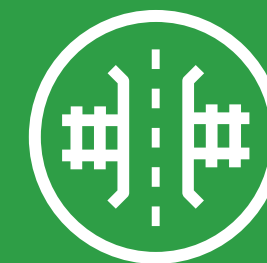


Our structure, operations & supply chains

McConnell Dowell operates a construction and engineering business which is organisationally structured to deliver projects through four (4) business units:

Australia, New Zealand & Pacific Islands, South East Asia and our building business - Built Environs.

McConnell Dowell provides engineering and construction solutions for customers in the following sectors:



Building

Construction of commercial buildings.



Energy

Construction of civil, electrical, mechanical, pipelines and tunnelling works to enable sustainable and efficient power infrastructure.



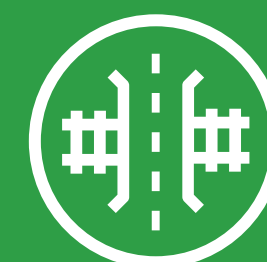
Ports & Coastal

Construction of ports, wharves, jetties, passenger terminals, marinas and defence marine facilities.



Resources

Construction of mining and metals and oil and gas assets.



Transport

Construction of rail, road and airport infrastructure



Water & Wastewater

Construction of intakes, pipelines, outfalls, treatment plants, dams and storage.

Our structure, operations & supply chains

continued.

McConnell Dowell delivers projects independently or as part of joint ventures. Typically, these joint ventures are unincorporated. McConnell Dowell's JV share varies, with a majority being 50%. Our partners in these ventures usually operate in similar industries and regions, which supports alignment on project goals and standards.

Our operations rely on a diverse workforce that includes executives, engineers, administrative staff, skilled tradespeople, and labourers. As of the end of the reporting period, McConnell Dowell employed 2572 individuals, predominantly based in Australia and New Zealand, but with significant numbers in South East Asia, which is recognised as a higher-risk region for modern slavery by the Global Slavery Index. Table 1 outlines the number of employees by location.

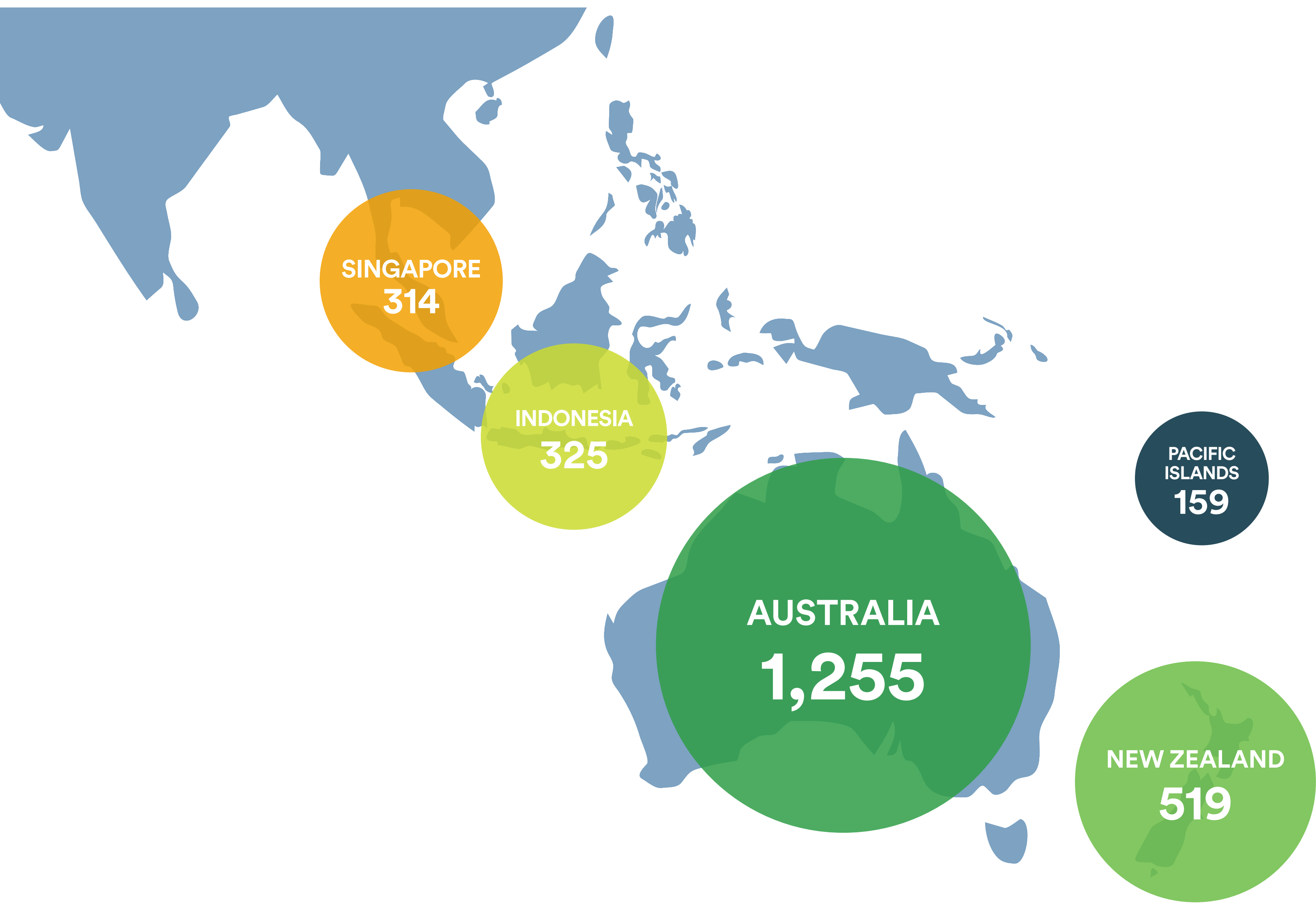
In addition to direct employees, we engage a range of indirect workers, such as contractors and labour hired through third-party agencies. These contracted workers are essential to our business operations. During the reporting period, McConnell Dowell spent approximately A\$94 million on third-party labour hire, with over 93% of this expenditure concentrated in Australia and New Zealand. Table 2 outlines labour hire spend by country of operation. Our supply chain includes a broad network of suppliers,

with approximately A\$2 billion spent on materials, goods, and services from around 8,200 suppliers. Table 3 outlines the vendor spend by category. A significant portion of this spend (over 90%) was with suppliers based in Australia and New Zealand. Table 4 outlines the vendor spend by country of incorporation.

Importantly, this analysis considers only the supplier's country of incorporation and does not fully capture the global origin of materials within each supplier's supply chain. For example, products sourced from a New Zealand supplier may contain materials originating from, or manufactured in, other countries. As with other reporting entities, we are currently working with our suppliers to identify ways of creating greater transparency of country of origin of materials used in our supply chain.



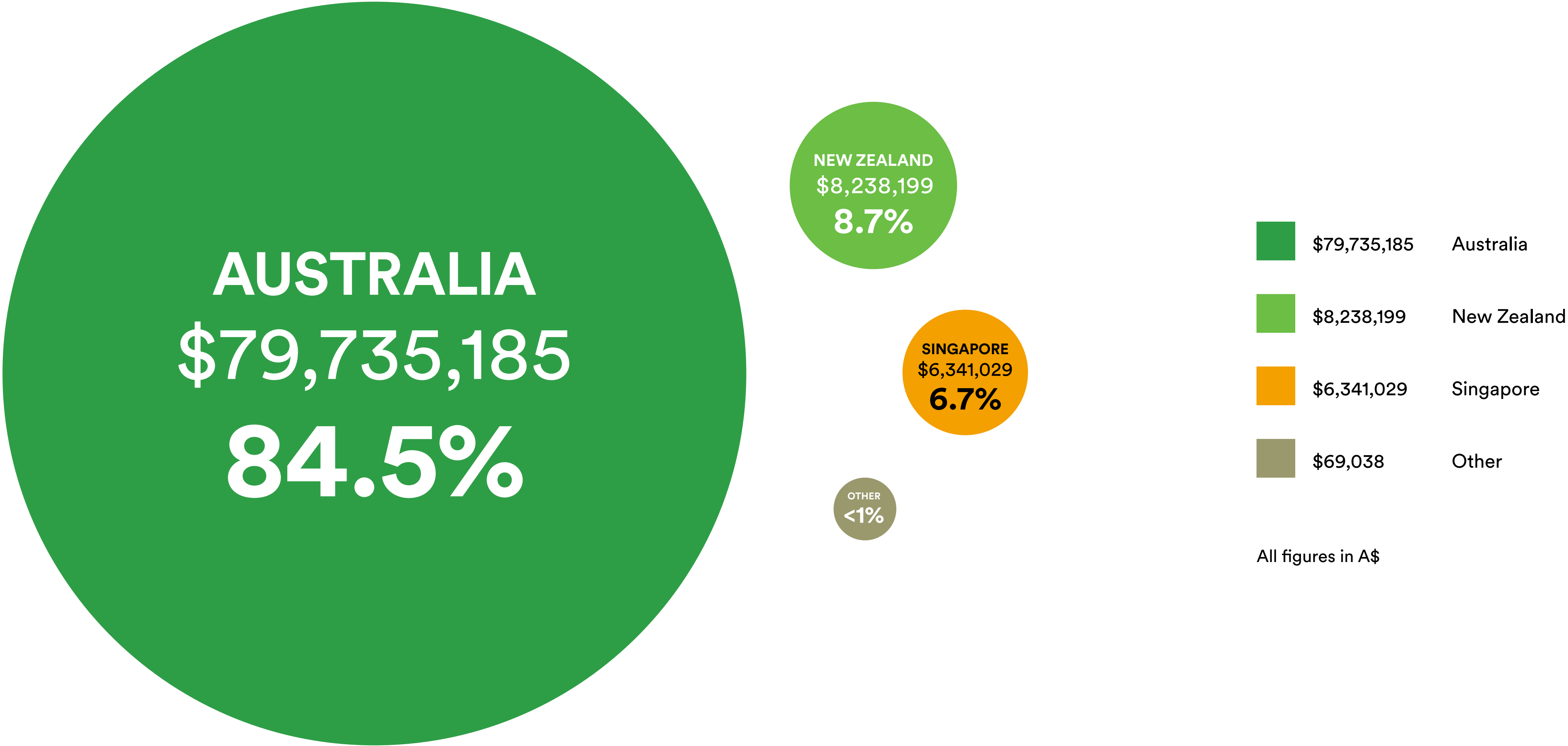
Number of Employees by Location



<div></div>	1255	Australia
<div></div>	519	New Zealand
<div></div>	325	Indonesia
<div></div>	314	Singapore
<div></div>	159	Pacific Islands
<div></div>	19	Other

at 30 June 2025

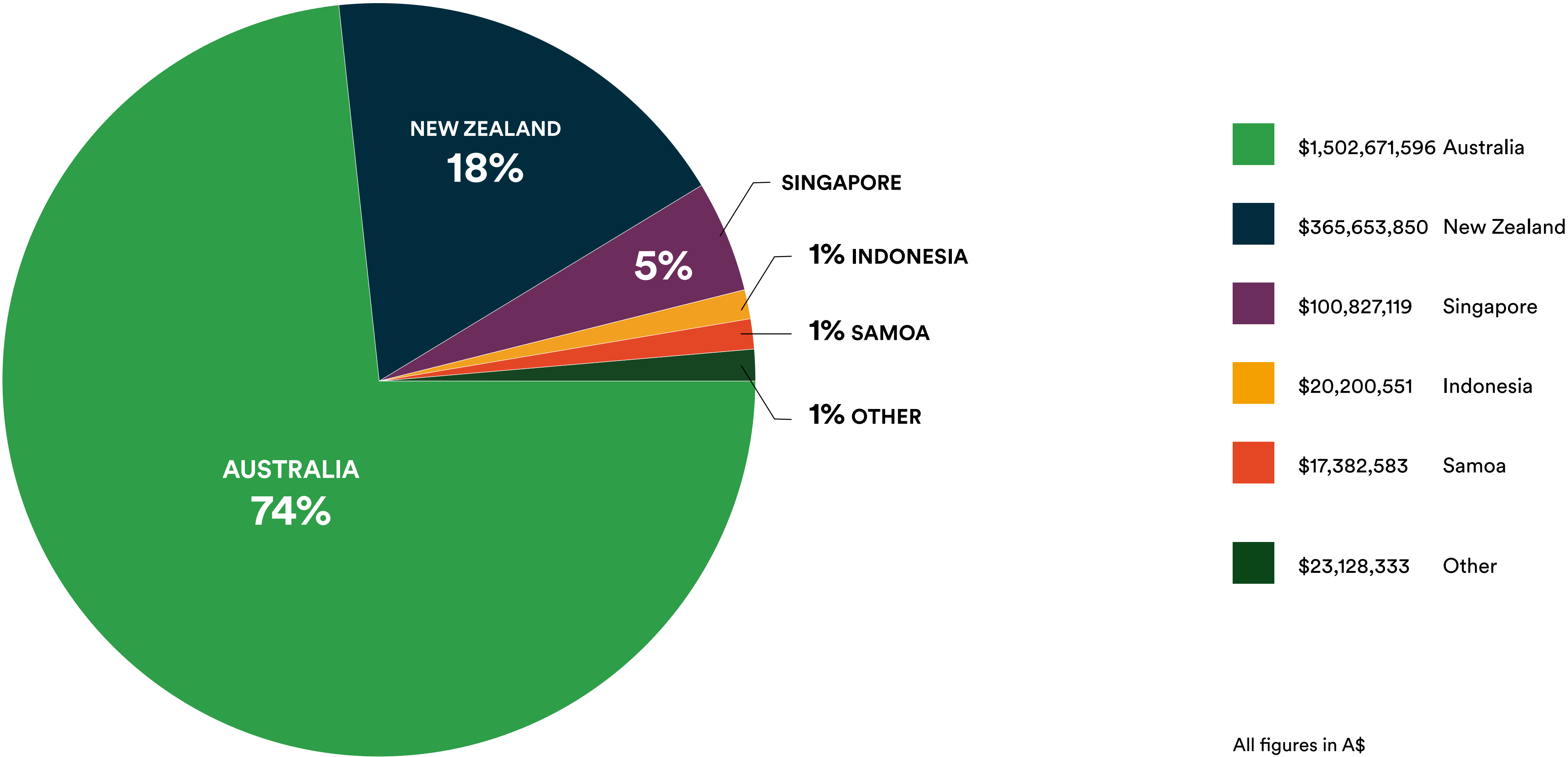
Labour Hire Spend by Country of Operation



Vendor Spend by Category



Vendor Spend by Country of Incorporation



Risks of modern slavery in our operations and supply chains

McConnell Dowell recognises that modern slavery risks are present across our operations and extensive supply chains. The complexities of these supply chains, along with various business factors, can limit transparency and increase the vulnerability of certain sectors to modern slavery.

Key contributing factors include:

Demand for Low-Skilled Labor: The high need for lower-skilled workers can lead to higher risks of exploitation.

Operations in High-Risk Geographies: We work in several regions that are flagged as high risk for modern slavery.

Subcontracting Model: Heavy reliance on subcontractors increases risk exposure.

Cost and Time Pressures: Industry norms of low margins and tight delivery schedules can exacerbate risks.

McConnell Dowell understands that its actions could either cause, contribute to, or be directly linked to modern slavery incidents:

Cause: Direct involvement where the company's actions or omissions lead to exploitation, such as if McConnell Dowell were to impose unfair labour conditions.

Contribute: Situations where McConnell Dowell's actions significantly influence modern slavery risks, like setting cost expectations that could lead contractors to exploit workers.

Directly Linked: When the company's services or products are associated with third-party exploitation, such as purchasing goods from suppliers with forced labour in their supply chains.



Risks of modern slavery in our operations and supply chains cont.

McConnell Dowell is committed to respecting human rights across all areas of its operations, in line with the UN Guiding Principles on Business and Human Rights*.

These principles include ensuring freedom of association, preventing workplace discrimination and harassment, and strictly prohibiting any form of modern slavery.

To uphold these commitments, we follow fair recruitment and employment practices, ensuring that employees are hired under legal contracts, are paid fairly, and can freely leave their employment, respecting notice periods. We also provide internal and external reporting channels for employees to safely raise concerns about unethical, improper, or illegal conduct, including issues related to modern slavery.

Our risk assessment indicates that modern slavery risk is negligible for our direct employees, largely due to the safeguards and processes we already have in place. However, we recognise that contingent or contracted workers, especially those in lower-skilled roles, temporary positions, or in specific geographic areas, may face higher vulnerability to exploitation.

McConnell Dowell has identified several high-risk areas within its operation, including:

- Labor Subcontracting: Subcontracted labour for projects, especially those in high-risk locations, pose notable risk.
- Construction Materials: High-risk when sourced by subcontractors.
- Onsite Accommodation and Catering: Particularly relevant in remote or international projects, where workers may be isolated and vulnerable.
- Telecommunications and IT Equipment: Sourcing hardware can carry significant risk due to the complex manufacturing supply chains.
- Cleaning and Security Services: These sectors have known vulnerabilities, especially where migrant or low-wage workers are used.
- Personal Protective Equipment (PPE): PPE sourcing can involve materials from regions with documented forced labour issues.

* UN Guiding Principles on Business and Human Rights document



Risks of modern slavery in our operations and supply chains cont.

During the reporting period, McConnell Dowell worked with over 8,200 suppliers. Our spend across these suppliers was highly concentrated, with the top 100 suppliers representing 37% of the total spend and the top 500 accounting for 72%. This concentration allows us to build stronger relationships with core suppliers, improving our ability to understand and manage risks within their operations. However, we are aware that each direct supplier may have its own complex network of suppliers, amplifying the potential footprint and risks in our extended supply chain.

McConnell Dowell remains committed to maintaining a safe and fair working environment for all workers, with a strong focus on supporting any vulnerable groups within our workforce and supply chain.



Actions taken to address the risk of modern slavery in our business

During the reporting McConnell Dowel implemented several key initiatives to address and reduce the risks of modern slavery within its operations and supply chains:

- Annual Pledge
- Ethixbase Assessments
- Modern Slavery Training
- Policy Review
- Industry Collaboration
- Modern Slavery Resource Hub

Each of these initiatives are detailed on the following pages ...





Actions taken to address the risk of modern slavery in our business cont.

1 The Annual Pledge

The McConnell Dowell annual pledge is a formal commitment made by employees to adhere to the ethical standards and values outlined in our Code of Conduct.

The Annual Pledge contains specific information about protecting human rights and preventing labour exploitation. By pledging to stand against modern slavery, employees take an active role in fostering a culture of respect, fairness and dignity for all workers. The pledge was completed by over 90% of staff during the reporting period.

- Due Diligence: Investigations into suppliers' labour practices to ensure they meet legal and ethical standards. This includes gathering information on working conditions, wages, employment contracts, and other indicators of potential forced labour.
- Ongoing Monitoring: Regular updates on any changes in third-party risk profiles, including shifts in compliance with modern slavery legislation, to enable proactive risk management.

2 Ethixbase Assessments

During the reporting period we continued to utilise the Ethixbase Modern Slavery Supply Chain Risk Assessment Questionnaire into our procurement processes. Ethixbase assists us to identify, assess and mitigate risks of forced labour, human trafficking, and exploitative practices in our supply chains by providing:

- Risk Assessment & Screening: Tools for evaluating third party vendors and suppliers for risks related to modern slavery and forced labour, helping companies identify high-risk areas in their supply chains.

3 Modern Slavery Training

During the reporting period 333 employees who may have exposure to Modern Slavery due to their function, location or nature of their work completed modern slavery training. This training was designed to raise awareness about Modern Slavery and provide guidance on how to recognise and respond to it.

Actions taken to address the risk of modern slavery in our business cont.

4 Policy Review

During the reporting period, the Company undertook a review and audit of all relevant policies, procedures, and operating standards to assess their appropriateness and effectiveness in addressing modern slavery risks. The audit confirmed that the existing framework remains robust, fit for purpose, and aligned with our obligations under the Modern Slavery Act. No amendments were deemed necessary at this time.

5 Industry Collaboration

During the reporting period, the Company actively engaged in industry collaboration to strengthen our collective response to modern slavery risks. This included participation in a number of industry forums, working groups, and knowledge-sharing sessions with peers, sector bodies, and subject matter experts. These engagements supported improved visibility of emerging risks, promoted alignment of good practice across the industry, and informed the ongoing enhancement of our internal approach.

6 Modern Slavery Resource Hub

During the reporting period, we also commenced work to establish a dedicated Modern Slavery Resource Hub on our intranet. This initiative is designed to centralise guidance, training materials, reporting pathways, and practical tools for employees and leaders. Development of the hub has been aligned with our broader intranet refresh project, and completion is expected in the next reporting period. This investment will further strengthen awareness, accessibility of information, and organisational capability in identifying and managing modern slavery risks.



Assessing the effectiveness of the actions taken

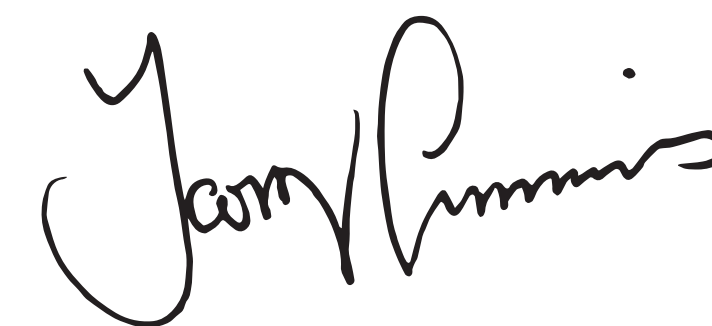
McConnell Dowell recognises that measuring the impact of individual actions against modern slavery risk is complex. Instead, we focus on core elements that support an effective overall response to modern slavery, which includes:

- Strong Standards: Establishing clear expectations for our workforce and suppliers, and ensuring these standards are communicated to all relevant parties.
- Thorough Risk Assessment: Performing in-depth assessments and due diligence processes to accurately identify, prevent, or mitigate modern slavery risks.
- Accessible Reporting Channels: Maintaining trusted grievance mechanisms that allow for safe reporting and effective handling of any modern slavery concerns.



Process of consultation within the Group

During the reporting period, consultation on modern slavery matters continued across key areas of the business. Engagement between Compliance, Procurement, People, and Sustainability functions supported the sharing of relevant information and informed the development of our modern slavery approach. In preparing this Modern Slavery Statement, draft versions were provided to senior leadership and relevant stakeholders to obtain feedback, ensure accuracy, and confirm alignment with our organisational commitments and compliance obligations. This process enabled coordinated input from the functions responsible for managing modern slavery risks across our operations.



Scott Cummins
Director & Chief Executive Officer





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