



2025

# MODERN SLAVERY STATEMENT

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## Acknowledgement of Country

Buildcorp acknowledges the traditional owners of the lands on which our offices are based and on which we work. We honour their connection to the land, waters and sky, and pay our respects to their Elders past, present and emerging. We walk together on Country in the spirit of reconciliation.

# MESSAGE FROM OUR MANAGING DIRECTOR

Modern slavery is a global human rights violation. The latest global statistics from 2021 estimate that 49.6 million people were enduring modern slavery conditions, and 27.6 million were engaged in forced labour. Globally, G20 nations face a combined risk of US\$468 billion from goods tainted by modern slavery. According to the International Labour Organisation (ILO) and Walk Free Foundation, almost a quarter (23%) of global profits generated from forced economic exploitation are concentrated in industries such as construction, manufacturing, mining, and utilities.

In Australia, Anti-Slavery Australia estimates that only 1 in 5 victims of modern slavery are identified or feel secure enough to come forward, despite 41,000 individuals impacted. Approximately \$17.4 billion worth of Australian imports are intricately connected to modern slavery, with at-risk products including electronics, fish, garments, solar panels, and textiles. Between 2023-24, the AFP received 382 reports of modern slavery and human trafficking offences, an increase of 12.35% from 340 reports the previous financial year. This highlights the urgent need for comprehensive and collaborative efforts to combat modern slavery on an international scale.

At Buildcorp, we are determined to play our role in taking concerted action to eradicate modern slavery and protect the rights and dignity of those who are most vulnerable to exploitation.

In 2025, as part of our commitment to continual improvement, Buildcorp continued to assess the risk of modern slavery among our direct supply chain, focusing on identifying inherent risks among our top suppliers by spend. We also established a digital onboarding risk identification process to verify current controls and due diligence activities, aiming to mitigate risks among workers, subcontractors, and suppliers. This has helped us better understand our supply chain and the barriers our suppliers face in providing the detailed information required for this level of due diligence.

The results of these initiatives are provided in this report. To help Buildcorp analyse this engagement and prepare for the 2025 reporting period, we were assisted by Unchained Solutions, a Sydney-based advisory and facilitation firm.

As the member of an industry with heightened exposure to the risk of modern slavery, Buildcorp continues to invest in a range of initiatives to support responsible procurement across our business. These initiatives aim to mitigate risk in our supply chain by complying with human rights, labour rights and environmental laws. We are also committed to the sustainable growth of our business, ensuring the long-term job security of our people, suppliers, and subcontractors.

This 2025 Modern Slavery Statement outlines our ongoing actions to work with our project partners to understand our supply chain risks and eliminate modern slavery in our operations.

## **Tony Sukkar AM**

Managing Director  
Buildcorp Holdings Pty Limited

15 December 2025

Since 2021, Buildcorp has been committed to the United Nations Global Compact corporate responsibility initiative and its principles in the areas of human rights, labour and the environment and anti-corruption.



# STRUCTURE, OPERATIONS AND SUPPLY CHAIN

**Buildcorp's** business operations are headquartered in Sydney with offices in Brisbane and Melbourne.



## Queensland

Level 8, 189 Grey Street,  
South Brisbane QLD 4101  
P 07 3139 0800



## New South Wales

Level 4, 10 Mallett Street,  
Camperdown NSW 2050  
P 02 9565 0000



## Victoria

Level 18, 627 Chapel Street,  
South Yarra VIC 3141  
P 03 9975 8800

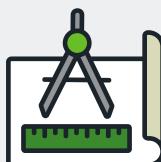
**Buildcorp operates in the non-residential construction industry across three broad market sectors, each with similar supply chains:**



New build projects, such as health, education, sporting facilities and commercial offices



Fit-out and refurbishment projects, primarily in existing commercial office buildings



Building remediation projects in residential, commercial and infrastructure facilities

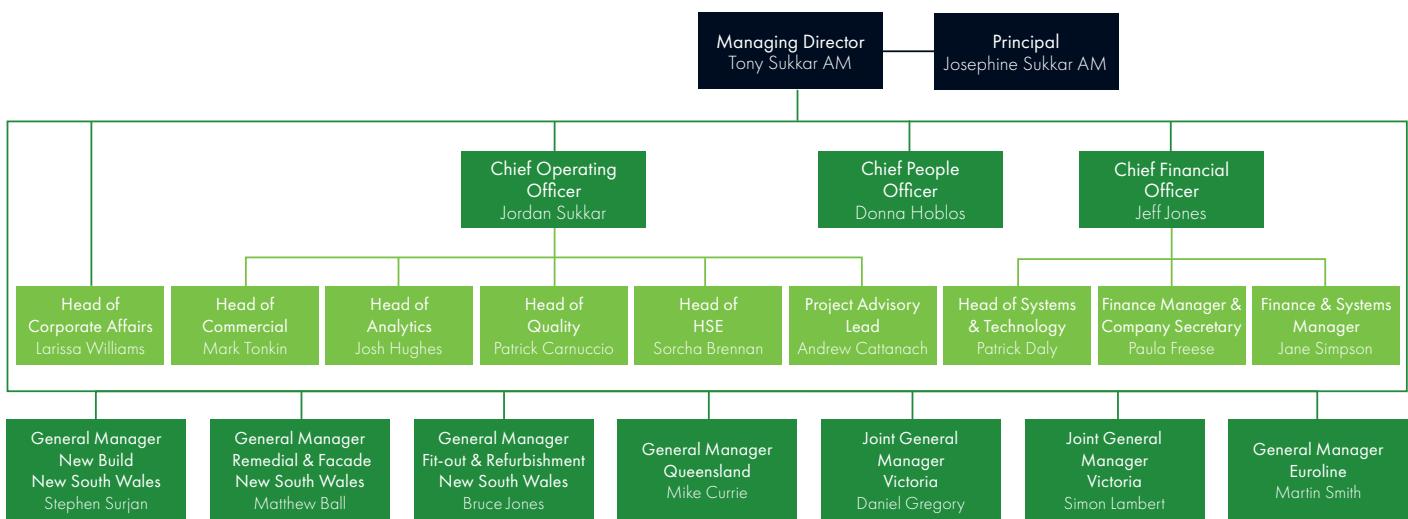
# Workforce

## Our people

On 30 June 2025, Buildcorp employed 575 staff. Nearly all are employed directly under permanent, fixed-term, part-time, or casual contracts, or under enterprise bargaining agreements. Like many other employers in our industry, Buildcorp makes use of workforce labour hire arrangements, working with vetted organisations providing these services.

All Buildcorp and labour hire employment contracts meet or exceed applicable state and federal employment standards. These arrangements significantly reduce the likelihood of modern slavery.

## Buildcorp Organisational Chart



## Subcontractors

Buildcorp is a project management-based construction company that subcontracts most worksite activities to Australian-based businesses. Buildcorp deals with approximately 400 - 500 subcontractor businesses at any one time, with most of the businesses classified as small to medium enterprises.

In many instances, these subcontractors engage their own subcontractors or material suppliers. Buildcorp's subcontract engagement agreements require subcontractors to seek approval before further subcontracting any of their own works.

We are mindful that the existence of subcontract layers mean we may not always have direct supervision over our third-party workforce or complete transparency over their terms and conditions of employment.

## Procurement

As part of our procurement standard practice, all suppliers and subcontractors, regardless of location of operations, are required to comply with our Supplier Code of Conduct to do business with Buildcorp. Section 3. *Human Rights and Fair Labour Practices* outlines our zero-tolerance policy in relation to modern slavery.

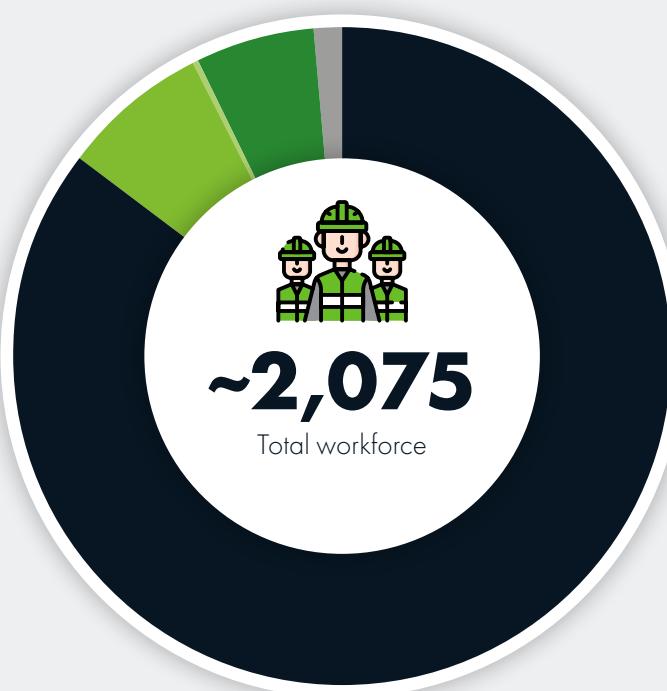
In the reporting year, we sourced goods and services from Australian-based businesses from 2,577 suppliers and subcontractors for:

- ▼ Construction materials and services
- ▼ Plant and equipment hire
- ▼ Labour hire
- ▼ Cleaning and waste removal
- ▼ Professional services
- ▼ Office suppliers and maintenance

In addition, we sourced goods and services directly from 6 overseas-based suppliers, mainly in the technology services segment.

Regardless of product sourcing locations, we recognise that construction materials can be processed and assembled in different countries, elevating the risk of modern slavery. The construction supply chain for raw materials is long, complex and often opaque, making it extremely challenging for end users to trace their origins. We are vigilant in monitoring this issue.

### Number of direct and indirectly hired people working across the Buildcorp Group in 2025:



**492**

Permanent Full-Time

**42**

Permanent Part-Time

**1**

Fixed-term Agreement

**33**

Enterprise Bargaining Agreement

**7**

Casual



**~1,500**

Indirect Labour  
(subcontracted at any one time)

# RISK OF MODERN SLAVERY IN OUR SUPPLY CHAIN



Construction has been identified as one of the sectors most prone to labour exploitation. Temporary workers in low-skilled and low-waged jobs can be present in both the industry workforce and in the supply chain for building materials. Globally, construction industry workers make up 18% of those subject to modern slavery (KPMG; Australian Human Rights Commission, 2020).

## 2025 Direct Supplier Risk Assessment

In early 2025, Buildcorp conducted an assessment to identify potential inherent risks, both on and offshore, in our supply chain amongst its suppliers by highest spend.

### Key insights informing our 2025–26 risk response include:



#### Risk categories with elevated exposure (by spend and/or count):

Electrical and data services; civil and ground works; structural steel; carpentry and joinery; demolition; plasterboard/partitions/linings; mechanical services; facades/windows/doors; concrete and formwork; wall and ceiling linings; professional services.



**Tier-based visibility:** Risk is materially higher beyond tier-1 for several material groups (e.g., steel, electronics, mechanical components, façade systems) where raw material extraction and component assembly occur in higher-risk geographies.



**Entity risk:** Labour-hire and subcontracting chains present risks of underpayment, deceptive recruiting, and poor conditions for migrant and temporary workers, especially through multi-layered subcontracting.



## LABOUR HIRE

Underpayment, indentured workers and exploitation of migrants in contracted and subcontracted services, such as demolition and cleaning.



## MECHANICAL EQUIPMENT

Labour rights and health & safety in overseas supply chains of parts, equipment (in machinery, lifts etc.), engine or vehicle parts, and other manufactured goods, including metal products.



## MATERIALS

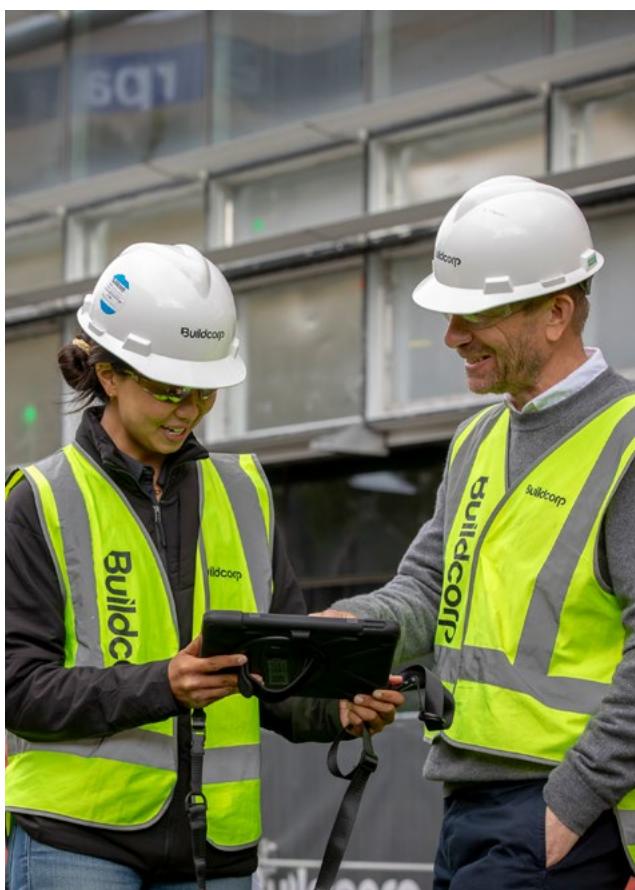
Labour rights, health and safety, and human rights and governance in the overseas supply chain of construction materials such as timber, plastic, glass, cement, gypsum, hardware, metals, tiles, textiles, brick, stone and sand.



## ELECTRONICS

Labour conditions and health & safety in overseas electronics supply chains, particularly child labour.

Because these risks are usually hidden, cross-referencing our spend by category against likelihood has enabled us to better distinguish and prioritise risks and opportunities, ensuring collective compliance on Buildcorp projects.



## 2025 Supplier Due Diligence: SAQ

In 2025 we established a strengthened, digital supplier due diligence program with three pillars:

- 1. Onboarding SAQ** – evidence-based questionnaire aligned to the Act and industry guidance;
- 2. Verification** – desktop checks of submitted evidence for high/very-high risk suppliers; and
- 3. Follow-up** – corrective actions and capability-building support for suppliers requiring improvements.

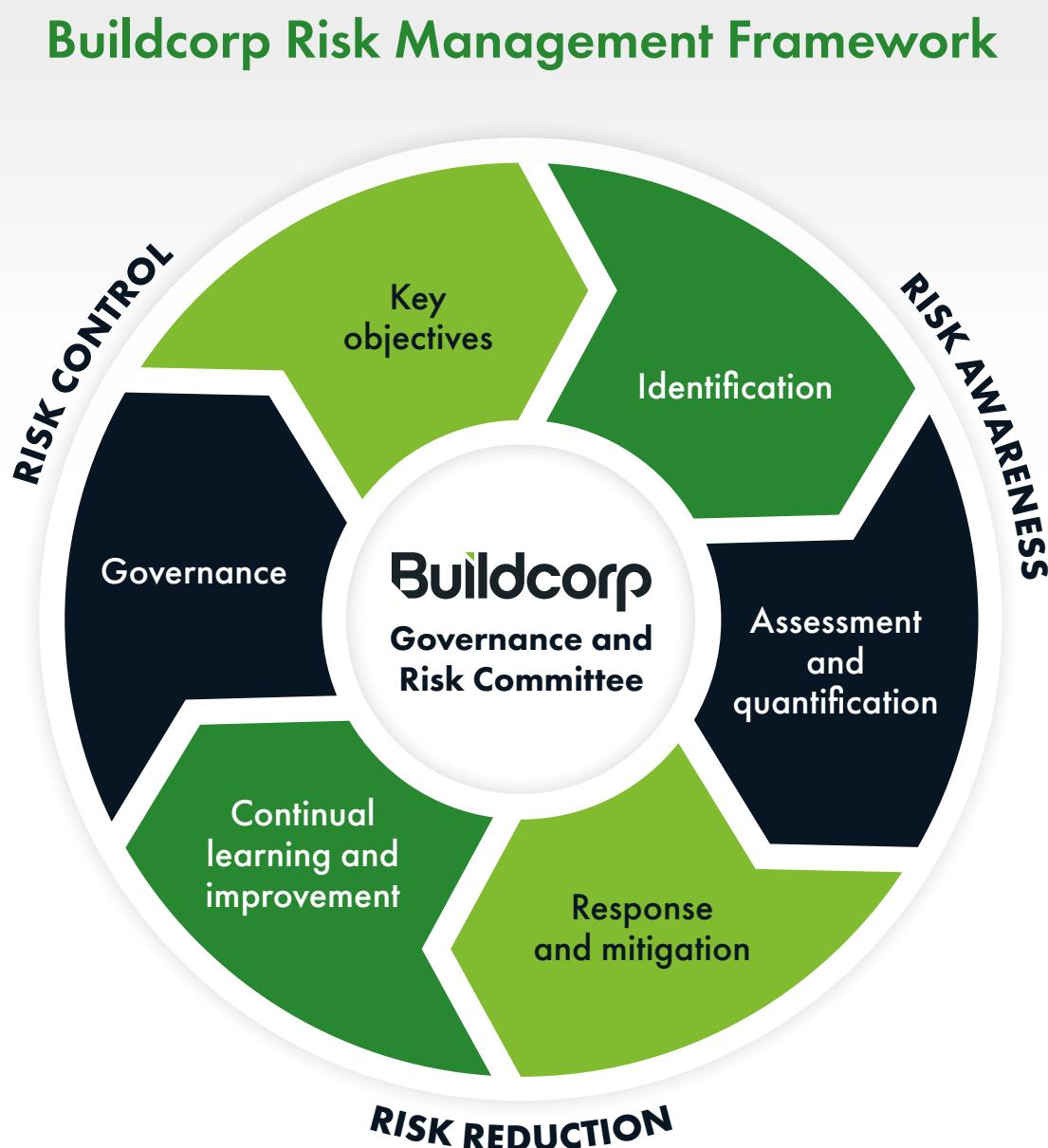
The program included a Fact Sheet to help smaller suppliers understand the rationale for the questions, key definitions and what information would help them to complete it.

This process commenced in June 2025 and will continue into the 2026 reporting period.

# HOW WE PREVENT AND MITIGATE THE RISK OF MODERN SLAVERY

## Governance

The Buildcorp Governance and Risk Committee is responsible for overseeing our governance and risk. Our Modern Slavery Management Framework has been developed by the Committee to prevent, detect and respond to incidents of modern slavery abuses in our operations and supply chain. This Framework is underpinned by policies and procedures, which are reviewed annually to ensure compliance with the Act.



## Policies

The following policies and procedures outline Buildcorp's approach to managing risk in relation to modern slavery:

Policy	Purpose
<b>Supplier Code of Conduct</b>	Sets Buildcorp's minimum standards for the conduct of our subcontractors and suppliers in the areas of labour, human rights, integrity, ethics, health, safety, environment and tax compliance.
<b>Ethical Business Conduct Policy</b>	Provides guidance on the expected behaviour of all Buildcorp employees. Details Buildcorp's zero-tolerance to any form of bribery or corruption as we conduct our business and operations.
<b>Responsible Procurement Policy</b>	Details Buildcorp's commitment to respecting the human rights of every person involved in our operations, supply chain and communities.
<b>Whistleblower Policy</b>	Provides a reporting framework through which Buildcorp employees, subcontractors, suppliers and members of the public can report instances of actual or suspected unethical or unlawful conduct, without fear of reprisal.

## Due diligence and management controls

Buildcorp encourages a collaborative approach, working with project partners and suppliers to implement risk mitigation measures in our supply chain. We recognise that due diligence enquiries with our subcontractors and suppliers are the single most important step we can take to avoid, identify and remediate instances of modern slavery in our operations and supply chain.

To address this, we:

- ▼ Include modern slavery questions in our pre-tender interviews
- ▼ Conduct compulsory online modern slavery training for all Buildcorp employees
- ▼ Include modern slavery issues and what to look out for in our onsite inductions
- ▼ Have clear site and office signage promoting whistleblower details and signs of modern slavery
- ▼ Review and update our policies and procedures each year to consider any new trends or understanding of modern slavery



## Reporting human rights concerns

Buildcorp has a whistleblower mechanism that allows employees, subcontractors, suppliers, clients, and members of the public to report instances of actual or suspected modern slavery associated with the company's operations. No concerns were reported or raised during the 2025 reporting period.

## Response and remedy framework

Since 2022, Buildcorp has incorporated the recommendations and framework of the Minderoo Foundation Walk Free initiative and the Human Rights Resources and Energy Collaborative's, Modern Slavery Response & Remedy Framework, and continue to apply this framework.



Source: Modern Slavery Response & Remedy Framework: Minderoo Foundation Walk Free initiative and the Human Rights Resources and Energy Collaborative, 2022

In adopting this model and its recommendations, Buildcorp's response will depend on its relationship to the harm – that is, whether it has caused, contributed to or is directly linked to the harm.

<b>CAUSE</b>	A company causes harm when its activities (or omissions) in and of themselves result in harm. For example, if Buildcorp uses forced labour.
<b>CONTRIBUTE</b>	A company contributes to harm when its activities significantly facilitate, enable, or incentivise a third party to cause harm. For example, if Buildcorp engages a low-cost cleaning contractor to service staff accommodation that does not pay their workers adequately.
<b>DIRECTLY LINKED</b>	A company is directly linked to harm caused by a third party if the harm is directly linked to its products, services, or operations through its business relationships. For example, if Buildcorp purchases components from a supplier that exploits its workers.

# MEASURING THE EFFECTIVENESS OF OUR MODERN SLAVERY FRAMEWORK



**WHAT CONDITIONS MIGHT PEOPLE BE LIVING AND WORKING IN?**

**Victims of Modern Slavery may:**

- Be forced to repay a debt, recruitment or travel expenses
- Be supervised from one location to another, with no access to social contact
- Be subject to a handler or what might happen if they try to escape
- Encounter intimidation and threats, or actual physical or sexual violence
- Face abuse, trauma, or degrading living or working conditions
- Face retention of passports, travel or ID documents
- Have their movements restricted, or not be allowed to access medical care
- Not be aware they have been trafficked, thinking they just in a bad job
- Reveal physical trauma such as bruising or untreated conditions
- Show psychological distress such as anxiety or poor memory of events

**Buldcorp Group Whistle Blower Policy:**  
To ensure high standards of professional and ethical workplace conduct and practices, Buldcorp Group has developed a policy and contractors can raise genuine concerns about activities or practices. Notify a manager or [whistleblower@buldcorp.com.au](mailto:whistleblower@buldcorp.com.au)

**SCHOOL** **PUBLIC** **be+er sydney** **Buildcorp**



**MODERN SLAVERY IS REAL AND CAN LOOK DIFFERENT FROM ONE WORKPLACE TO THE NEXT.**

**What is Modern Slavery?** The term describes situations of serious exploitation in Australia or abroad where coercers, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern Slavery includes trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour. It does not include substandard working conditions or underpayment, but these practices are also illegal, harmful and may be present in situations of modern slavery. Could you spot the signs of someone in Modern Slavery?

**Buildcorp Group Whistle Blower Policy:**  
To ensure high standards of professional and ethical workplace conduct and practices, Buldcorp Group has developed a policy and contractors can raise genuine concerns about activities or practices. Notify a manager or [whistleblower@buldcorp.com.au](mailto:whistleblower@buldcorp.com.au)

**SCHOOL** **PUBLIC** **be+er sydney** **Buildcorp**

## 2025 Progress

We have made progress on most of the key actions identified in our 2024 Modern Slavery Statement. The principal focus during 2024-25 was to conduct a further inherent risk assessment and to continue our supplier due diligence process using an SAQ that focused risk mitigation strategies.

Key actions	Detail	Progress
<b>Continual improvement of our modern slavery awareness training for Buildcorp employees.</b>	Site managers and supervisors have all completed additional face-to-face training so they can deliver modern slavery training through our on-site induction process. A modern slavery section has also been included in our site induction pack. Signage highlighting the risk of modern slavery, what to look out for, and how to report it is posted in all our work sites and offices.	<b>ONGOING</b>
<b>Adapt our supplier onboarding to include compulsory Modern Slavery assessment for major procurement contracts (&gt;\$2m contract values).</b>	Engagement with new suppliers through a compact self-assessment questionnaire managed through Unchained Solutions.	<b>IN PROGRESS</b>



# CONTINUAL IMPROVEMENT

## 2026 Action Plan

Our key priority for the 2026 reporting period is to develop our supplier engagement and due diligence program through two main action items:

Our 2026 Action Plan also includes:

- ▼ Improve our supplier due diligence capabilities with a planned upgrade of our vendor management capabilities in the second half of the 2026 reporting year. This will improve vendor compliance with our controls before their engagement, noting that it is often very difficult to have vendors comply with modern slavery compliance issues once they are engaged by Buildcorp.
- ▼ Conduct research on our largest labour hire firms and selected subcontractors with high labour content to benchmark their alignment with the *Modern Slavery Act 2018 (Cth)* and UNGP.



# CONSULTATION

## Approach

We undertake a Group-wide approach to managing modern slavery risk within our business and supply chain. All reporting entities listed below are embedded within our program of work. Regarding our modern slavery response, all business units within the listed entities are addressed by a whole-of-group function. Our policies, procedures and practices are applicable to the entirety of Buildcorp Holdings.

## Approval

This Statement has been prepared by Buildcorp Holdings Pty Limited ABN 51 140 508 685 and applies to its wholly owned entities:

▼ Buildcorp Group Pty Limited	ACN 091 336 168
▼ Buildcorp Infrastructure Solutions Pty Limited	ACN 099 362 286
▼ Buildcorp Contracting	ACN 003 922 825
▼ Buildcorp Interiors Pty Limited	ACN 073 932 788
▼ Buildcorp Securities and Investments Pty Limited	ACN 055 880 585

This Statement has been developed in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)* (the Act). It describes how Buildcorp has addressed modern slavery risks in the year ended 30 June 2025.

This Modern Slavery Statement was approved Tony Sukkar AM, the Sole Director and governing body of Buildcorp Holdings, who is the responsible member as defined by the Act:



**Tony Sukkar AM**

Sole Director & Managing Director  
Buildcorp Holdings Pty Limited

15 December 2025

# APPENDIX A

This table shows how our 2025 Modern Slavery Statement aligns with the mandatory criteria.

A Modern Slavery Statement must, in relation to each reporting entity covered by the statement:

Requirement	Addressed under
(a) identify the reporting entity; and	Structure, operations and supply chain
(b) describe the structure, operations, and supply chains of the reporting entity; and	
(c) describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities that the reporting entity owns or controls; and	Risk of modern slavery in our business
(d) describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes; and	How we prevent and mitigate the risk of modern slavery Continual improvement
(e) describe how the reporting entity assesses the effectiveness of such actions; and	Measuring the effectiveness of our Modern Slavery framework
(f) describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a statement under section 14—the entity giving the statement;	Consultation with reporting entities
(g) include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Refer to our Policies section for links to all relevant documents.

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**Buildcorp**