

# MODERN SLAVERY ANNUAL REPORT (2024 FINANCIAL YEAR)

## Preamble

Multiplex is a construction company that conducts business on a global level, with operations in Australia, Europe and Canada. In these regions we are known for delivering the world's best projects.

Across each region, Multiplex's purpose is consistent – to construct a better future. Our values are:

- **We keep it real** - We are upfront, open and realistic. We are genuine about delivering what we say we will.
- **We care about people** - We respect, include and look after our people and those around us, empowering and supporting them to thrive.
- **We are collaborative** - We bring everyone together, making meaningful connections to bring about positive impact. We are consultative and responsive from the earliest opportunity.
- **We have grit** - We are driven, pragmatic and agile thinkers continuously learning and exploring possibilities. We have the courage to solve the most complex problems, when others can't, and the staying power to last the distance.

In line with our purpose and our values we are committed to the human rights of our workforce and those that work with us in our supply chain.

This joint report is made pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C. 2023, c. 9 (the **Act**) in respect of Multiplex's Canadian operations, being Multiplex Construction Canada Limited and Multiplex Canada Holdings Limited (collectively, **Multiplex Canada**). This report covers the period between January 1, 2024 to December 31, 2024.

## Disclosure Requirements

Section 11 of the Act requires certain entities to report to the Minister of Public Safety and Emergency Preparedness on the steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity.

Multiplex Canada's responses are provided below.

### 1. Structure, Activities and Supply Chains.

#### Structure

The highest governance body within the Canadian team is the Canadian Regional Executive Group. This body is ultimately responsible for all decision-making on economic, environmental, and social topics within the Canadian business. The Regional Executive Group reports to the Executive Directors of the global operations.

At the end of the reporting period Multiplex Canada had a total of 173 personnel, which is inclusive of 34 unionized construction labourers/ unionized skilled labour and 139 head office/site management personnel. Our construction labourers are all unionized workers under collective agreements that are renegotiated every three years. Our site management and head office personnel are salaried employees with competitive remuneration packages.

#### Activities

Multiplex Canada constructs buildings in a range of sectors in the Greater Toronto and Hamilton Area. Each project undertaken in this region has a standalone project delivery team responsible for managing the pre-construction (planning), construction and close out/warranty phases of their projects. The project delivery teams ultimately report to the Canadian Regional Executive Group.

#### Supply Chains

Multiplex Canada operates on a subcontract model, whereby it manages a subcontractor and supplier workforce, rather than a self-delivery model. On that basis we have a wide range of subcontractors who are involved in projects from excavation through to fit out and commissioning. The entities that Multiplex Canada engages with are primarily Canadian registered entities, who may use supply chains overseas.

## **2. Policies and Due Diligence**

### **Policies**

Multiplex Canada maintains policies and procedures that set out our minimum requirements and promote ethical behaviour and social responsibility. These policies and procedures are regularly reviewed and amended (where required) to ensure we continue to develop and improve. These policies and procedures include:

- Anti-Modern Slavery Policy
- Code of Business Conduct and Ethics
- Positive Work Environment Policy
- Anti-Bribery and Corruption Policy
- Ethics hotline posted in conspicuous areas at all construction sites and at head office
- Implementation of high standards of Health and Safety in the workplace for all employees and construction workers on our sites

Our aim is to ensure that our staff are confident to ask appropriate questions in respect of Modern Slavery when visiting these facilities and to report concerns they might have.

### **Due Diligence Processes**

Multiplex Canada uses a centralized procurement department to purchase materials, services and labour for its construction projects. The process we use for preapproving members of the supply chain has appropriate questioning on modern slavery. Multiplex Canada's procurement model requires proponents to confirm that they have a written policy and adequate procedures in place for prevention of bribery and corrupt practices both within the company and that of its supply chain.

Multiplex Canada requires compliance (through contractual agreements) with our policies and procedures relating to modern slavery and worker welfare from its own workforce, and all subcontractors and suppliers. We continue to work with and assist our supply chain to implement their own equivalent policies, procedures and systems to identify and manage their own supply chain risks. Typically, our relationships with the supply chain are long term, and that is important and conducive to having good discussions and garnering feedback on tackling modern slavery and promoting ethical labour practices.

We conduct health and safety audits not only on our projects, but also on suppliers and subcontractors. Our due diligence procedures allow us to check and monitor the working conditions of construction workers on our sites and elsewhere in our supply chain to identify any unsafe conditions.

Multiplex Canada periodically conducts in person reviews and visits to factories and manufacturing plants located both in Canada and, on occasion, internationally. These visits are part of the way we meet our due diligence requirements.

Our aim is to ensure that our staff are confident to ask appropriate questions in respect of Modern Slavery when visiting these facilities and to report concerns they might have.

## **3. Forced Labour and Child Labour Risk and Management**

Multiplex Canada operates in an industry where a large number of the subcontractors will source materials and supplies that:

- Are from countries that are regarded as having difficult human rights environments.
- May be products that are manufactured by low skilled and low paid workforces.
- Have workforces who may be on labour hire/day rates; and
- Are priced in highly competitive tendered markets.

Multiplex Canada engages with its subcontractors and suppliers to make sure that they acknowledge and understand the importance of complying with its ethical requirements.

Supply chains in construction can often be long, as it is usual for our supply chain to in turn have their own supply chains. We continue to work with our subcontractors and supply chain to help educate and assist them in managing the risks they have downstream.

In terms of Multiplex Canadian employees, we have a comprehensive onboarding process and sophisticated salary review processes involving a range of people and disciplines within the business. Combined with a very low number of employees on visas, we assess the risk of modern slavery in our employee workforce as low.

Multiplex Canada also has a third-party independent hotline for reporting of any ethics-based matter.

#### **4. Remediation Measures**

Multiplex Canada has not encountered any instances of forced labour or child labour. As such, no remediation measures have been taken.

#### **5. Remediation of Loss of Income**

Multiplex Canada is not aware of any instance where its efforts to prevent and reduce the risk of forced or child labour in its activities or supply chains contributed to a loss of income for vulnerable families.

#### **6. Training and Capacity Building**

Multiplex Canada undertakes annual training for all employees on the Code of Business Conduct and Ethics. This training is undertaken globally and has a requirement for an 80% pass rate on a number of test questions that occur following completion of the learning module. Since 2020 on an annual basis, Multiplex Canada has included a specific module to cover Modern Slavery. All staff must complete a number of scenarios on modern slavery concerns.

In addition, Multiplex Canada requires Code of Business Conduct and Ethics policy sign off for all new starters in the business together with an induction program that highlights safety, health and wellbeing.

All of Multiplex's Canadian employees have written employment contracts and associated documents with easy access to Multiplex Canada's policy and procedures, which are hosted on the internal intranet.

#### **7. Measuring Effectiveness**

Multiplex Canada uses the following tools to assess the effectiveness of how we monitor our modern slavery obligations:

- Review calls made to the Ethics hotline.
- Discussion at the Global Executive Group level of concerns that the business may have.
- Appropriate questioning of particular concerns in other meeting forums, such as at the Canadian Credit and Risk Committee.

This joint report has been approved by the governing bodies of both Multiplex Construction Canada Limited and Multiplex Canada Holdings Limited this 20<sup>th</sup> day of May 2025 pursuant to section 11(4)(b)(ii) of the Act.