# **MODERN SLAVERY STATEMENT FY2023**

# MADE BY MULTIPLEX CONSTRUCTIONS PTY LIMITED AND ITS RELATED ENTITIES WITHIN AUSTRALIA

This is the Modern Slavery Statement of Multiplex Constructions Pty Limited, the Australian arm of the Multiplex global construction company that has been in existence since 1962.

We are a construction company, known for delivering the world's best projects and our purpose is simple: 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.

The requirements under the Modern Slavery Act, 2018 (Cth) (the Act) call for reporting on 7 mandatory areas, and set out below are the following statements:

### 1. **Reporting Entities**

This Statement is made under the Act by Multiplex Constructions Pty Limited on behalf of itself and its related entities in Australia being, Multiplex Constructions Qld Pty Limited, Multiplex Pty Limited and Multiplex Australasia Pty Limited. These are the primary operating entities of Multiplex in Australia.

In this Statement the terms Multiplex and we and us are used to refer collectively to the reporting entities and subsidiaries

#### 2. The Structure, operations and supply chains of the entity

Multiplex operates on a global level, with operations primarily in Australia, Europe, and Canada.

In Australia the business operates under a board comprised of the Australian Executive Group. This consists of the CEO, the Regional Managing Directors of each of our regions in Australia, the CFO and the Executive Directors of Safety, Operations, People and Legal.

Construction work in all States other than Queensland is undertaken by Multiplex Constructions Pty Limited. In Queensland, due to very specific legislation, the construction work is undertaken by Multiplex Constructions Qld Pty Limited. Our people across Australia are employed by Multiplex Australasia Pty Limited and Multiplex Pty Limited is the parent of these entities.

## **Projects**

Each project undertaken in Australia has a standalone project delivery team who manage the project, design and construction of a range of projects. The buildings we construct cover a range of sectors, including commercial, residential, hospitals, and universities. They can be relatively straightforward to iconic. We have completed Stadia, museums, law courts and are currently undertaking the new airport for Western Sydney.

During the reporting period Multiplex undertook 41 projects in Australia, with 8 of these completing before 31 December 2023.

# **Operations**

Multiplex operates on a subcontract model, whereby Multiplex 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 supply chain has a mix of Australian subcontractors and some limited international subcontractors for specialist trades. The entities that Multiplex engages with are primarily Australian registered entities, who may use supply chains overseas. A good example of overseas procurement is in respect of specialist timber roofing, such as is being procured from Italy for the Sydney Fish Market project and façade contractors who manufacture typically in China.

An analysis of the Australian supply chain has shown that we engage almost exclusively with Australian subcontractors and suppliers. In 2023 only .021% of the workbook was contracted to overseas entities. However, our subcontractors/suppliers then would engage with overseas based suppliers.

# **People**

Multiplex during the reporting period had a workforce of 1764 employees, being:

Permanent (including Construction Workers)	1648
Part Time	53
Contractors	62

In 2023 Multiplex had 32 employees on working visas.

### 3. The risk of Modern slavery in the operations and supply chains of the reporting entity and any entities it owns or controls

Multiplex 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.
- Maybe 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 engages with its subcontractors and suppliers to make sure that they acknowledge and understand the importance of complying with Multiplex' 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' 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 also has a third-party multi-lingual independent hotline for reporting of any ethics based matter. Posters advertising a number, QR code or web-based approach are available in all offices including site offices and are available for our supply chain and workers on sites to use, including our subcontractors. Issues can be raised anonymously through this process.

### 4. The actions taken by the reporting entity to assess and address the risks including Due Diligence and remediation

### Policies/procedures:

At Multiplex, we maintain 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
- Anti-Bribery and Corruption Policy
- Anti-Modern Slavery and Human Trafficking Charter for Suppliers and Service Providers, which sets out requirements for our suppliers and service providers
- Operation of a multilingual independent Ethics hotline/web site
- Implementation of high standards of Health and Safety in the workplace for all employees and construction workers on our sites

Site Visits: Following the end of the Covid Pandemic, Multiplex has again commenced in person reviews and visits to factories and manufacturing plants located both in Australia and internationally. These regular 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.

### Contractual documentation and audits:

Multiplex makes sure that our contractual documentation and the process we use for preapproving members of the supply chain has appropriate questioning on modern slavery. As part of the tendering process all subcontractors and suppliers and consultants are required to acknowledge the Multiplex Anti-Modern Slavery Policy and have to advise that they have carried out due diligence on their own supply chain.

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.

## Training:

Multiplex 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 has included a specific module to cover Modern Slavery. All staff must complete a number of scenarios on modern slavery concerns.

In addition, Multiplex runs compulsory Code of Business Conduct and Ethics training for all new starters in the business together with an induction program that highlights safety, health and wellbeing.

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

Multiplex requires compliance (through contractual agreements) with our policies and procedures relating to modern slavery and worker welfare from its own workforce, and all subcontractors, suppliers and recruitment agents. 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.

#### How the effectiveness of such actions is assessed 5.

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

- Review calls made to the Ethics hotline. During the reporting period the decision to make this readily available by posters at all sites was implemented and will be reviewed in the 2024 reporting year to see if this has resulted in increased use of the hotline/web site.
- A pilot program with a more in-depth questionnaire for subcontractors is going to be undertaken in 2024 to assess the risk on a specified project in more detail.
- Discussion at an Australian Executive Group level of concerns that the business may have.
- Appropriate questioning of particular concerns in other meeting forums, such as at the Credit and Risk Committee.

### The process of consultation with entities owned or controlled by Multiplex Constructions 6. Pty Limited.

The Australian Executive Group sits across the Multiplex entities that operate in Australia and this statement has been reviewed and approved by them on behalf of Multiplex and the entities named in paragraph 1 above.

#### 7. Other relevant info

Multiplex is committed to improving its processes in respect of modern slavery and will continue to develop relevant training and due diligence.

This Statement has been approved by all Directors of Multiplex Constructions Pty Limited and has been signed by John Flecker as a Director and Chief Executive Officer of Multiplex Constructions Pty Limited.

This statement for the 2023 financial year is published pursuant to section 14 of the Act and was finalised with each reporting entity.

John Flecker

Chief Executive Officer

Multiplex Constructions Pty Limited

Dated: 14/02/2024