

# Modern Slavery Statement

## 1. REPORTING ENTITY

This Modern Slavery statement is made in compliance with the Modern Slavery Act (Cth) 2018 (the **Act**) for MBMPL PLTY LTD (**MBM/we/us/our**) to cover the period of 1 July 2024 to 30 June 2025 (the **Reporting Period**)

MBM is committed to respecting and protecting human rights and ensuring that modern slavery and human trafficking have no place in our operations or supply chains. We recognize our responsibility under the Act to identify, assess, and address modern slavery risks and to act transparently in our practices.

This statement outlines the steps we have taken during the financial year ending 30 June 2025 to understand and mitigate modern slavery risks in our business operations and supply chains.

## 2. OUR STRUCTURE, OPERATIONS, AND SUPPLY CHAINS

### 2.1. About MBM

Established in 2002, MBM is a national independent professional services firm specialising in quantity surveying and asset consulting. Our expertise ranges from quantity surveying, building consultancy, tax depreciation & asset services, Public Private Partnerships (PPP) advice, infrastructure, facilities management advice and expert witness advice.

MBM has grown from a small boutique firm to a national practice of over 180 staff operating across offices in Sydney (head office), Melbourne, Brisbane, Adelaide, Canberra and Perth, while still retaining our focus on relationships and delivering client service excellence.

We are a values-driven business founded on precision, integrity, and reliability. We provide our clients with expertise and assurance on every project, large or small and we have high expectations when it comes to technical skills, experience and advice.

### 2.2. Our Operations

MBM workforce is primarily professional and office-based, consisting of qualified professionals employed under fair conditions in Australia. We do not employ temporary or seasonal workers in high-risk industries.

As part of our business operations, we engage suppliers from the following core areas:

- Personnel – employees, recruitment services and contractors;
- Professional service providers – IT support, legal, insurance, accounting;
- Office-related suppliers – IT equipment, office furniture, stationery, kitchen amenities;
- Software providers – business platforms, software as a service, estimation tools;
- Travel and accommodation services;
- Property and facility management services – landlords, utilities, cleaning, maintenance;

Most of our suppliers are based in Australia, with some software and IT services procured from reputable international providers.

### 3. MODERN SLAVERY RISKS

MBM recognises that Modern Slavery remains a widespread and deeply concerning issue that affects millions of people globally. As a socially responsible organisation, MBM strives to uphold the highest standards in every aspect of our business and expect the same level of diligence and responsibility from all our suppliers, service providers, and business partners.

We take a firm stance against any practice that constitutes modern slavery—including forced labour, child labour, debt bondage, and exploitation. MBM adopts a zero-tolerance approach toward these violations, and we are fully dedicated to proactively identifying, preventing, and addressing any risks associated with such practices within our organisation or among those with whom we do business.

MBM considers our overall risk of directly causing or contributing to modern slavery is low given:

- The nature of our business - our direct business operations do not involve manual labour processes; and
- Our geographic reach being within Australia where there are strict Modern Slavery legislation and frameworks; and
- We do not have vendor relationships with large manufacturing businesses where modern slavery has been found to be an issue; and
- Our supply chains are relatively straightforward and does not involve complex tiers of contractors or subcontractors.

MBM mostly sources and hires our own full-time employees. All employment arrangements are governed by formal written contracts that are aligned with Australian labour laws and international standards. These are administered and monitored by qualified human resources professionals.

MBM remain strongly committed to providing a workplace that is safe, inclusive, and respectful for all personnel. We have implemented a comprehensive policy framework that strictly prohibits any form of abuse, including threats, harassment, coercion, or violence. Our people policies are designed to promote wellbeing and to foster a culture of mutual respect and accountability at every level of the business.

Throughout the Reporting Period, MBM did not identify any incidents or indicators of modern slavery within our business operations or among our suppliers. However, we are aware of the indirect risks that may arise from certain areas:

- Cleaning and facility maintenance services (outsourced labour)
- IT hardware supply chains (manufacturing in higher-risk countries)

### 4. ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

During the reporting period, we have undertaken the following actions:

#### 4.1. Due Diligence Framework

MBM has formally introduced both our Modern Slavery Questionnaire and Supplier Code of Conduct into our procurement and vendor onboarding processes, allowing us to assess the ethical standing of prospective suppliers before any formal engagement is established.

By embedding these requirements into the early stages of supplier engagement, we ensure that all potential vendors are made fully aware of MBM's expectations around ethical conduct, labour practices, and human rights compliance.

This approach reinforces our commitment to working only with organisations that share our zero-tolerance stance on modern slavery and align with our broader corporate values of integrity, transparency, and accountability.

#### 4.2. Risk Assessment Annual Suppliers Questionnaire

MBM has developed and continues to refine a dedicated Supplier Modern Slavery Questionnaire (the Questionnaire) which requires our suppliers to disclose the policies, controls, and procedures they have implemented to identify and mitigate modern slavery risks within their own operations and supply chains.

Our latest Supplier Modern Slavery Questionnaire was updated to specifically ask respondents whether they are subject to reporting obligations under the *Modern Slavery Act 2018 (Cth)*. This allowed us to identify which suppliers are legally bound by the Act and to evaluate their alignment with its requirements, including the existence of formal modern slavery statements or internal policies.

During this Reporting Period, the Questionnaire has been sent to all our Tier One operations suppliers. We achieved a strong response rate, with **79%** of suppliers returning completed questionnaires or alternatively providing supporting documentation such as their own modern slavery statements or internal policies prior to the end of the Reporting Period.

All responses were thoroughly reviewed, and no instances or indicators of modern slavery risk were identified within our Tier One supplier group.

While we consider this result a positive reflection of the effectiveness of our current approach, we are committed to continuous improvement. As such, we have set an objective for the next Reporting Period to further increase supplier responsiveness and broaden the application of the Supplier Questionnaire to our Tier Two supplier group.

#### 4.3. Internal Policies and Training

At MBM, we have continued to strengthen our internal governance framework to ensure alignment with our commitment to ethical and responsible business practices, particularly in relation to identifying and addressing modern slavery risks.

As part of this, MBM undertook a thorough review and update of our Modern Slavery Policy and Code of Conduct to explicitly incorporate our expectations around ethical sourcing, labour rights, and a zero-tolerance stance toward all forms of modern slavery and human trafficking. These updates are communicated clearly to our suppliers and serve as a foundational part of our procurement and due diligence processes.

We also delivered modern slavery awareness training to our operations and management teams, recognising their critical role in engaging with suppliers and managing third-party risk. This training equips key staff with the knowledge to understand how modern slavery can manifest in professional services and supply chains, and how to respond appropriately if concerns are raised.

In addition, we have developed a robust Whistleblower Policy, which provides a safe and confidential mechanism for employees, contractors, and suppliers to report any unethical conduct—including suspected modern slavery—without fear of reprisal. This reporting channel is central to our compliance and risk management efforts.

Together, these actions form a critical part of MBM's overall compliance and ethical sourcing strategy, enabling us to continuously strengthen our internal controls and build a culture of awareness, accountability, and proactive risk management.

## 5. FUTURE COMMITMENTS

MBM is actively monitoring the development of legislation and regulatory requirements related to modern slavery and will continue to reassess and update our measures to identify, mitigate and prevent modern slavery risks across our supply chain in accordance with all applicable laws and regulatory expectations.

In the next Reporting Period, MBM is committed to:

- Further strengthen our due diligence process with ongoing improvement of our Modern Slavery Policies and procedures;
- Continue to improve our risk identification process by enhancing our supply chain mapping;
- Identify the Tier Two Supplier group in our higher risk categories and conduct a review of their operational practices and Modern Slavery risks;
- Provide ongoing training and education regarding modern slavery risks to all employees

## 6. CONSULTATION AND APPROVAL

This Statement was developed through consultation with the leadership teams across all offices and business units, including Finance, Operations, and HR teams, to ensure a whole-of-business approach to addressing modern slavery risks.

The Statement has been reviewed and approved by the CEO of MBM on 2 September 2025.

*David Pearson*

David Pearson  
CEO  
MBMpl Pty Ltd

Version	Date	Revision Details	Approved By
1	September 2025	Original Issue	David Pearson