

Statement of Modern Slavery Policy

Thank you for your interest in MBM's Modern Slavery Policy. At MBM, we are dedicated to creating a workplace that is safe, respectful, and free from harassment. Below are specific measures that MBM has implemented to address and prevent sexual harassment while fostering an inclusive and supportive environment for all employees:

1. Policy Adoption

MBM has embedded anti-modern slavery commitments into the core of its operations by directly aligning our practices with the Modern Slavery Act 2018 (Cth). All MBM employees, suppliers, and contractors are required to follow our Modern Slavery Policy, which is integrated into employment contracts and supplier agreements. These documents mandate compliance with MBM's stringent anti-slavery principles, reflecting our organisation-wide zero-tolerance approach to modern slavery.

2. Policy Utilisation

MBM utilises its Modern Slavery Policy to create a culture of transparency and accountability within our supply chain management. We conduct comprehensive modern slavery risk assessments annually, focusing on suppliers operating in high-risk sectors. Each supplier is required to complete a Modern Slavery Supplier Assessment, enabling MBM to evaluate their operations and adherence to ethical labour standards. Suppliers who fail to meet MBM's compliance requirements are provided with a clear improvement framework to align with our standards.

3. Policy Integration

MBM has integrated its Modern Slavery Policy into procurement workflows and risk management processes to ensure compliance at every stage. For example:

- MBM implement a risk matrix that scores suppliers on their exposure to modern slavery risks.
 - When onboarding new suppliers, MBM requires contractual commitments to anti-slavery practices, ensuring that all parties uphold ethical labour standards.
 - Offshore procurement is subject to enhanced risk assessment, with a focus on identifying vulnerabilities specific to certain geographies and industries.
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4. Objectives

MBM's Modern Slavery Policy is driven by specific goals, including:

- Eradicating all forms of modern slavery within MBM's operations and supply chains.
- Ensuring every supplier adheres to the same ethical standards as MBM, as outlined in our Supplier Code of Conduct.
- Protecting vulnerable workers by proactively addressing risks associated with forced labour and exploitation.
- Fostering a culture where employees are educated on modern slavery risks and empowered to report concerns.

5. Practices

MBM has implemented practical steps to address modern slavery risks:

- **Supplier and Partner Engagement:** MBM conducts supplier audits periodically and requires high-risk suppliers to report on their own supply chains. For example, suppliers in high-risk ESG sectors must submit detailed compliance reports, which MBM reviews to ensure alignment with our ethical standards.
- **Employees:** MBM delivers mandatory annual training to all employees, focusing on identifying modern slavery risks specific to the property and construction industries. Real-life scenarios are discussed to help employees recognise and address potential exploitation.
- **Grievance Mechanisms:** Employees, suppliers, and stakeholders have access to a confidential whistleblower committee managed by the National Operations Manager. Reports are investigated promptly, with findings shared directly with senior management.
- **Proactive Interventions:** MBM works closely with suppliers flagged for non-compliance, providing tailored guidance to help them address deficiencies while ensuring operational integrity.

6. Actions

MBM takes deliberate actions to address modern slavery risks:

- **Investigations and Reporting:** The National Operations Manager reviews all unusual supplier activity, such as discrepancies in labour costs or unusual subcontractor practices and investigates them thoroughly. If instances of exploitation are confirmed, MBM promptly reports them to relevant authorities and disengages from the supplier.
- **Transparent Communication:** MBM communicates directly with suppliers and clients on modern slavery issues, ensuring shared accountability and alignment with our standards.
- **Continuous Improvement:** MBM sets annual performance goals for modern slavery risk management. Recent actions include introducing a modern slavery compliance checklist for procurement teams and collaborating with industry partners to promote ethical sourcing practices.

MBM's Board oversees all modern slavery risk management efforts, ensuring policies and practices remain robust and effective. The CEO provides quarterly updates to the Board on progress, key findings, and opportunities for improvement.

Thank you for your understanding and cooperation.

Yours Sincerely

MBMpl Pty Ltd

David Pearson

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CEO