

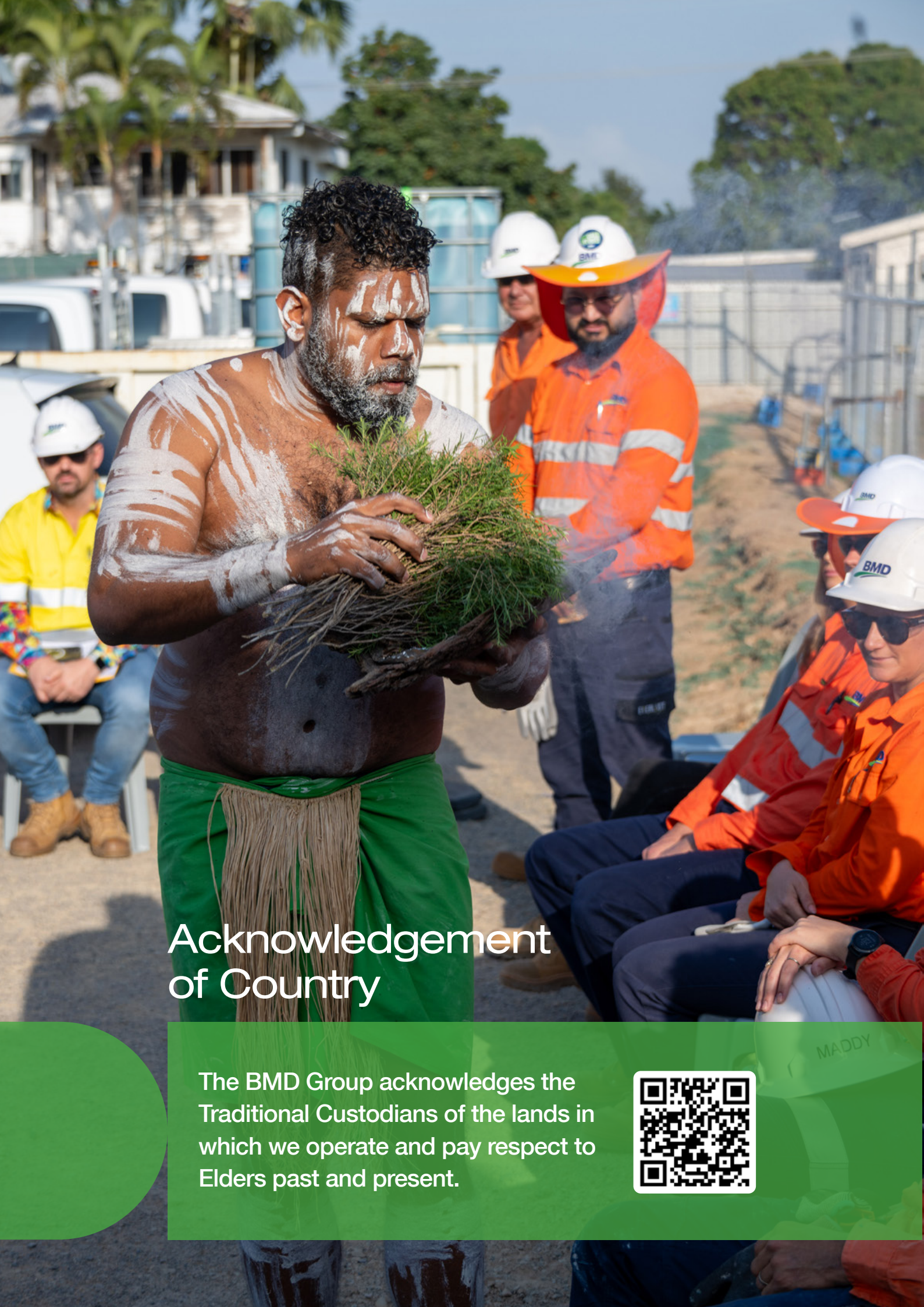


BMD Group

Modern Slavery Statement 2024



WE SEE THINGS
DIFFERENTLY



Acknowledgement of Country

The BMD Group acknowledges the Traditional Custodians of the lands in which we operate and pay respect to Elders past and present.




MADDY

“Thank you [BMD] for supporting our efforts to identify and mitigate modern slavery throughout our supply chains. Partners like you help us work towards our mission of making a sustainable future possible together.”

KAREN LOWE, PROCUREMENT SPECIALIST,
ETHICAL SOURCING LEAD, CLEANAWAY

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BMD has prepared this Modern Slavery Statement to address the requirements of the Australian Modern Slavery Act 2018. The reporting period covered by this Statement is the 2023-24 financial year and this statement applies to the entities listed on page seven.

This statement does not apply to the BMD Group's non-controlled joint ventures or entities in which BMD has an interest but are required to report in their own right under the Act.

All reporting entities covered by the statement were consulted on its development and as required by the Act, the statement has been signed by Scott Power, Group Director - Chief Executive Officer, BMD Group.

We welcome feedback on this Statement and how the BMD Group is addressing modern slavery risks at enquiries.nsw@bmd.com.au



A message from the CEO

BMD is Australia's leading integrated engineering, construction and urban development business.

With projects spanning across Australia, so too does our supply chain. As a leader within the construction industry, we think deeply about how we conduct ourselves as a business and the impact we have on our communities.

Our value system, unique culture and commitment to our people guides everything we do with our Australian owned and family heritage forming an important part of how we conduct ourselves.

We support efforts to protect human rights and prevent modern slavery from taking place in our operations and supply chains. Our policies across our code of conduct set our expectations for our people and our supply chain. We are, and will continue to remain, vigilant to ensure modern slavery never takes a foothold in our business operations.

We welcome the transparency of this annual reporting statement which we provide in accordance with the Modern Slavery Act 2018 (Cth). It has been approved by the Board of Directors of BMD Holdings Pty Ltd on behalf of the BMD Group of companies (BMD).

A handwritten signature in black ink, appearing to read 'Scott Power', written over a horizontal line.

Scott Power

GROUP DIRECTOR
CHIEF EXECUTIVE OFFICER

Our organisations and offices

WHO WE ARE

Since our foundation in 1979, BMD has grown to become Australia's leading integrated engineering, construction and urban development business. Our foundations are built on family values which underpin our enduring collaborative approach and we are committed to creating lasting legacies for generations to come.

BMD employs over 2300 people in addition to the many more who are engaged by our suppliers, consultants, and advisors.

Our business is our people and we are proud of the long-standing relationships we have built through our 45 year history.

With people at the core of everything we do, it is our duty to ensure our employees and those within our supply chain are paid and treated fairly.

OUR EXPERIENCE EXTENDS ACROSS AUSTRALIA IN THE FOLLOWING SECTORS:

Aviation

Rail

Port

Resources

Defence

Transport

Water and wastewater

Land development

Community infrastructure

Building

Engineering design

Landscape construction



BMD HOLDINGS PTY LTD (PARENT)

COMPANY | ACN 010 093 348 | ABN 47 010 093 348

The parent company of a national group of companies engaged in engineering, design, construction and land development for clients and partners in the urban development, transport infrastructure as well as resources and energy sectors.

BMD CONSTRUCTIONS PTY LIMITED

COMPANY | ACN 010 126 100 | ABN 59 010 126 100

Involved in the provision of major civil construction services for the delivery of infrastructure projects across the transport, defence, rail, energy, water and wastewater, port, resources and oil and gas industries.

BMD URBAN

COMPANY | ACN 158 035 539 | ABN 65 158 035 539

Our urban division delivers civil infrastructure for clients nationally across a range of sectors, with capabilities including earthworks, pavements and pipeworks.

EMPOWER ENGINEERS & PROJECT MANAGERS PTY LTD

COMPANY | ACN 010 743 692 | ABN 23 010 743 692

Design and project management consultancy utilised internally by the BMD Group companies and external clients.

URBEX PTY LTD

COMPANY | ACN 102 865 823 | ABN 24 102 865 823

Property development arm of BMD and creator of innovative living environments and communities.

JMAC CONSTRUCTIONS PTY LTD

COMPANY | ACN 065 374 414 | ABN 81 065 374 414

JMac has evolved into one of the industry's leading commercial landscape and building companies. Specialising in landscape construction including residential, commercial, industrial, public infrastructure, environmental rehabilitation and long-term care and maintenance.

ALL INCLUSIVE TRAVEL PTY LTD TRADING AS COMPLETE BUSINESS TRAVEL

COMPANY | ACN 647 898 146 | ABN 74 647 898 146

Corporate and leisure travel agency delivering a superior customer experience and tailored travel management solutions.

NIEPE CONSTRUCTION PTY LTD

COMPANY | ACN 122 112 752 | ABN 65 122 112 752

A leading civil structures subcontractor delivering quality civil concrete structures for important public infrastructure projects.

EAST COAST COMMERCIALS

COMPANY | ABN 71 011 036 285

Vehicle dealer and retailer offering the best range of used commercial vehicles in Queensland and a state-of-the-art service centre specialising in servicing small trucks, buses and Fiat motorhomes.

BETTER MOTOR DEALS

COMPANY | ABN 59 010 126 100

Operating in the sale of ex-BMD company vehicles including high end, mid-range and tool of trade automobiles.



Our supply chains

BMD works with suppliers who have similar values, ethics, and sustainable business practices, including in relation to human rights. We understand that the risks relating to suppliers will vary depending on industry, geographic location, and company size.

BMD seeks compliance with modern slavery legislation from suppliers through acceptance of the terms and conditions included within supplier, contractor and/or consultancy agreements, and via the raising of purchase orders.

The procurement of supplies and materials is common to all of our operations. However, BMD is mainly focused on our engineering and construction businesses which have a complex supply chain structure to support the differing purposes of each entity. Regardless, all our operations need to act in accordance with our corporate values. All our employees have a responsibility to prevent, identify, and report on concerns they may have in relation to modern slavery within BMD's operations and supply chains.

In the 2024 financial year, BMD (excluding Urbex and Empower Engineers & Project Managers which have minimal procurement spend apart from staffing) spent approximately \$1.39 billion on purchasing products and services from in excess of 6000 subcontractors, suppliers and consultants.

Goods and services purchased included construction materials, uniforms, personal protective equipment, stationery, machinery, equipment hire, car and fleet leasing, design and architecture, communications, traffic management, security, waste, recycling, information technologies, insurance, legal and environmental products.

Purchases made by BMD were made direct with those suppliers located in Australia with local Australian operations. Some of these suppliers source internationally before on selling to the local Australian market.

The main goods and services procured by BMD include:

- 1. labour - including contractors and labour hire in accordance with all Commonwealth and state/territory laws and requirements**
- 2. materials - such as quarry products, concrete, and asphalt**
- 3. plant and equipment.**

Understanding our modern slavery risks

As the key business operations of BMD involve engineering, construction, and the use of natural resources, BMD acknowledges the risk of modern slavery within our supply chains, which although low, need to be monitored and managed.

The overwhelming majority of BMD's workforce is located in Australia and protected by federal and state/territory laws pertaining to industrial relations, workplace health and safety, and human rights. Compliance with such laws is also complemented by BMD's own policies and procedures in areas such as human resources, workplace inclusion and diversity and industrial relations management - which often exceed minimum lawful standards.

BMD's direct sourced material imports are minimal. The bulk of BMD's requirements are sourced onshore from reputable suppliers, in accordance with their own modern slavery statements and compliance to Australian laws.

As a consequence, BMD has determined its operations and supply chains are at low risk of causing or contributing to modern slavery. However, although minimal there is the potential risk of modern slavery through exposure to international supply chains. Modern slavery practices may occur in the activities of BMD's overseas suppliers or alternatively through local suppliers who may source components of their supply from overseas.



BMD has identified the following goods and services as representing heightened risk of modern slavery:

- ▼ **certain information and communication technologies (ICT) equipment**
- ▼ **uniforms and personal protective equipment**
- ▼ **stationery supplies**
- ▼ **casual labour-hire undertaken on a project-specific basis.**

In early 2024, BMD held discussions with a select cohort of key supply chain and joint venture partners to better understand the processes and procedures their businesses undertake to address modern slavery.

The process has provided BMD with a continuous improvement opportunity to strengthen our approach to addressing modern slavery risks.



Actions taken to assess and address modern slavery risks

BMD has risk management processes to assist in identifying areas of concern to allow mitigating action to be taken to lessen these risks, including:

1. BMD's Modern Slavery Policy outlining BMD's commitment to preventing, detecting, and reporting the risk of slavery or human trafficking within BMD's operations and supply chains.
2. The provision of mandatory modern slavery clauses in all procurement contracts such as purchase orders, labour hire contracts and subcontractor/ supplier agreements. These provisions provide significant warranties from suppliers and subcontractors that they are not just complying with modern slavery laws but are obligated to advise BMD of any breaches or potential breaches. This authorises BMD to undertake audits and checks to ensure they are complying with their contractual and legal obligations in relation to modern slavery practices.
3. Due diligence processes when taking on new suppliers, including verification and audit checks.
4. Highlighting its Code of Conduct for suppliers, which details the expectations on all suppliers in relation to preventing modern slavery.
5. The existence of its Serious Misconduct Disclosure Policy, which enables all employees to comfortably and confidentially report any concerns they have relating to modern slavery in BMD's operations and supply chains.

6. As part of BMD employees' annual induction, new and existing employees will undertake a training module on our modern slavery policy. This will be implemented from 2025.
7. 2025 will also see further training provided to personnel in the business who hold positions that may interact with modern slavery risks.
8. With BMD now established internationally in the UK and Philippines, we take our values, high standards and knowledge in the modern slavery space to help guide us in these regions, while understanding and learning the modern slavery practices from those parts of the globe to continually improve our compliance locally.

The business wide Audit and Risk Committee continued to meet regularly to consider modern slavery legislation and related issues that impact all levels of BMD's operations.

REMEDIATION

After receiving any report of a modern slavery incident, the Audit and Risk Committee will meet to prepare a report to the BMD Group Board including potential remediation strategies. The main form of action may include reviewing and improving existing policies and procedures; additional employee and supplier education programs; more detailed surveys and auditing; and ceasing relevant activities including terminating contracts with non-complying suppliers.

No incidents of modern slavery were noted in the business in the 2023-24 financial year.

Assessing the effectiveness of actions taken

In 2024, BMD continues to foster relationships with suppliers to better understand their businesses and ensure that potential risks of modern slavery occurring within a supplier's operations are promptly addressed and managed.

BMD will continue to review the effectiveness of our actions and processes to address modern slavery concerns and risks through the auspices of the Audit and Risk Committee.

BMD's Sustainability (EESG) Committee continues to provide oversight and guidance on EESG strategy, including compliance with related laws, regulations and policies. In 2024, the committee, employees, and leadership team conducted a comprehensive business-wide materiality assessment and gap analysis. The insights gained from this process informed the creation of the BMD Group's Roadmap Report, which in turn facilitated the development of the company's Sustainability

Priorities. These priorities encompass key material topics crucial to the business and are structured around four key pillars: enhancing our environment, prioritising our people, creating enduring legacies and ensuring positive business sustainability.

Ensuring positive business sustainability is a priority for BMD, with the business consistently evolving systems, processes and data security to ensure the continuity of an ethical and compliant business and supply chain.

BMD's supplier onboarding questionnaire is being enhanced, with a planned launch of the updated survey in early 2025.

Consultation process

BMD has implemented a Modern Slavery Policy which outlines our commitment to prevent, detect, and report the risk of slavery or human trafficking within our operations and supply chains. This policy also articulates the fundamental elements of our approach to human rights, and how we demonstrate our commitment to respecting these rights in line with international frameworks.

This policy applies to all directors, senior management and employees across every level of the BMD Group (including full-time, part-time and casual). It is applied in addition to BMD's existing Human Resources Standard, which is limited to the conduct of employees in relation to dealings with clients, colleagues and other stakeholders.



**OUR BUSINESS
IS OUR PEOPLE**



@BMDGroup

bmd.com.au