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Modern Slavery Policy

Brunel Group: Brunel Building Services Pty Ltd and Brunel Pilbara Pty Ltd

Purpose and scope

This policy reflects Brunel Group's commitment to ensuring, to the best of our ability, that modern slavery does not occur in any part of our operations or supply chain. We are committed to acting ethically and with integrity in all business dealings and relationships, and to implementing effective systems and controls to prevent modern slavery.

We recognise that modern slavery, including forced labour, human trafficking, servitude and exploitative working conditions, is a serious violation of human rights. In accordance with the United Nations Guiding Principles on Business and Human Rights[1] (UNGPs), we aim to identify and address risks related to employment conditions, recruitment practices and wage compliance. Our goal is to ensure that all workers within our operations and supply chains are treated fairly, work in safe environments and are paid appropriately in line with local laws and international labour standards.

Our commitment

- We will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, in our contracting processes.
- We expect all service providers, suppliers and contractors to share our commitment to act lawfully and ethically, and to work proactively to ensure modern slavery does not occur within their organisation or supply chain.
- We will prevent modern slavery within our operations by implementing robust controls, monitoring practices and continuous improvement measures. This includes ensuring that all internal processes, procurement activities and business decisions uphold human rights and align with our ethical standards.

Definitions

The term 'modern slavery' describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Coercion, threats and deception can be explicit or implicit.

The *Modern Slavery Act 2018* (Cth) ('the Act') defines modern slavery as including eight types of serious exploitation:

- Trafficking in persons
- Slavery
- Servitude
- Forced labour
- Forced marriage
- Debt bondage
- The worst forms of child labour
- Deceptive recruiting for labour or services

The worst forms of child labour means extreme forms of child labour that involve the serious exploitation of children, including through enslavement or exposure to dangerous work. It does not mean all child work.

Under Australian law, modern slavery is defined in the Act. In the event of any inconsistency, the definitions in the Act take precedence over this policy.

Who this policy applies to

In line with the UN Guiding Principles, this policy applies to our employees, those who conduct business on our behalf and our Direct Suppliers[2]. We require all Direct Suppliers to comply with this policy as part of their engagement with us.

We also expect all suppliers to act consistently with their human rights obligations and to endeavour to promote human rights in all their own business relationships, including with downstream suppliers.

Approval

Approved by	Timothy Harrison
Position	Director, Brunel Group
Date	19 May 2026
Signature	Timothy Harrison

[1] United Nations Guiding Principles on Business and Human Rights (adopted 16 June 2011), available at https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf

[2] Direct Suppliers are suppliers that have a direct contractual relationship with Brunel Group. They typically provide finished goods or services and are the most visible part of the supply chain.