

# MODERN SLAVERY STATEMENT 2025



**POWERING FUTURES,  
CREATING LEGACIES.**






# 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, and recognise their enduring connection to land, sea and community. As we continue to build and develop across Australia, we remain committed to learning from and working respectfully alongside Aboriginal and Torres Strait Islander communities, contributing positively to their wellbeing and prosperity.

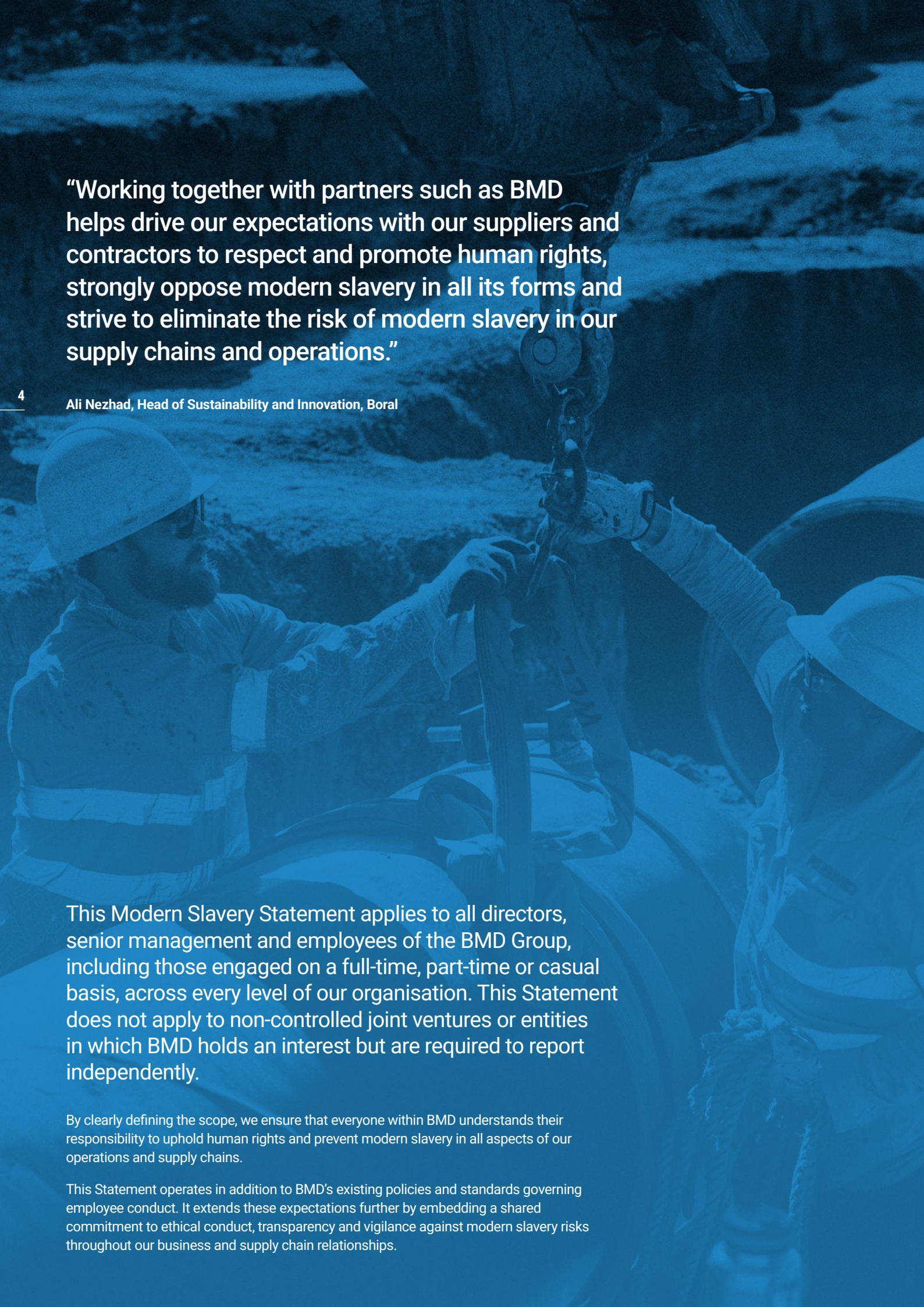


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“Working together with partners such as BMD helps drive our expectations with our suppliers and contractors to respect and promote human rights, strongly oppose modern slavery in all its forms and strive to eliminate the risk of modern slavery in our supply chains and operations.”

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Ali Nezhad, Head of Sustainability and Innovation, Boral

This Modern Slavery Statement applies to all directors, senior management and employees of the BMD Group, including those engaged on a full-time, part-time or casual basis, across every level of our organisation. This Statement does not apply to non-controlled joint ventures or entities in which BMD holds an interest but are required to report independently.

By clearly defining the scope, we ensure that everyone within BMD understands their responsibility to uphold human rights and prevent modern slavery in all aspects of our operations and supply chains.

This Statement operates in addition to BMD's existing policies and standards governing employee conduct. It extends these expectations further by embedding a shared commitment to ethical conduct, transparency and vigilance against modern slavery risks throughout our business and supply chain relationships.



# A MESSAGE FROM THE CEO

At BMD, our purpose of powering futures, creating legacies is a commitment we are not just upholding for the neighbourhoods and communities in which we operate, but for our people, suppliers and the partners who we work with.

As Australia's leading integrated engineering, construction and urban development business and with operations across Australia, the Philippines and the United Kingdom, we are deeply mindful of how we operate as a business and the lasting impact we have beyond the projects we deliver.

Our values, culture and unwavering commitment to our people guide the way we operate. These principles shape the way we conduct ourselves, protecting human rights and preventing modern slavery across our operations and supply chains remains a non-negotiable priority.

We set clear expectations for ourselves and our partners, taking proactive steps to ensure modern slavery has no place in our operations or supply chains. Our Board and senior leadership actively oversee these commitments to embed them at every level of our business.

This Statement has been approved by the Board of Directors of BMD Holdings Pty Ltd on behalf of the BMD Group of companies (BMD). We welcome feedback on this Statement and how the BMD Group is addressing modern slavery risks at [compliance@bmd.com.au](mailto:compliance@bmd.com.au).



**Scott Power**  
GROUP DIRECTOR  
CHIEF EXECUTIVE OFFICER

# OUR ORGANISATION AND OFFICES

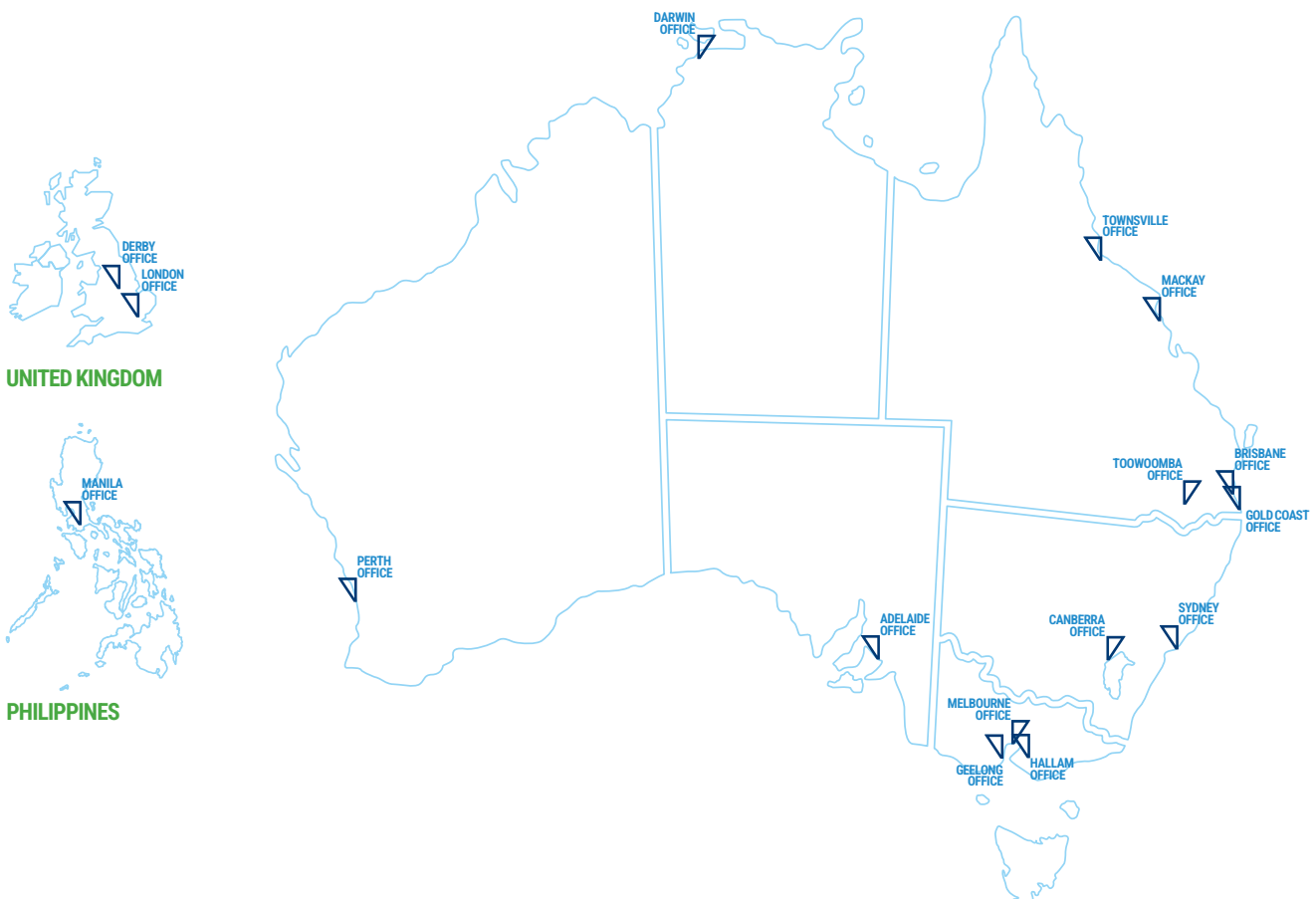
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Since 1979, BMD has grown into Australia's leading integrated engineering, construction and urban development business, with operations extending to the Philippines and the United Kingdom. Grounded in strong family values and a collaborative approach, we deliver infrastructure solutions that connect and transform communities, creating lasting legacies for generations.

BMD employs over 3,000 people globally, supported by a wide network of suppliers, consultants and advisors. Our success is built on the dedication of our people and the strong relationships we foster across our partnerships and supply chains. We are committed to ensuring that everyone working with or for BMD is paid and treated fairly at every stage of their journey.

## OUR EXPERIENCE EXTENDS GLOBALLY, WITH EXPERTISE IN THE FOLLOWING SECTORS:

|                      |                  |                          |           |        |         |
|----------------------|------------------|--------------------------|-----------|--------|---------|
| Aviation             | Rail             | Port                     | Resources | Energy | Defence |
| Transport            | Land development | Community infrastructure |           |        |         |
| Water and wastewater | Buildings        | Property development     |           |        |         |



**BMD HOLDINGS PTY LTD (PARENT)**

|         |                 |                    |
|---------|-----------------|--------------------|
| Company | ACN 010 093 348 | ABN 47 010 093 348 |
|---------|-----------------|--------------------|

The parent company of an Australian group of companies engaged in specialist 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 PTY LTD**

|         |                 |                    |
|---------|-----------------|--------------------|
| Company | ACN 158 035 539 | ABN 65 158 035 539 |
|---------|-----------------|--------------------|

Our urban division delivers civil infrastructure for private and government 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 |
|---------|-----------------|--------------------|

Specialist design, engineering, project management and consultancy business utilised internally by the BMD Group Companies and external clients to deliver solutions to the property and infrastructure sectors.

**URBEX PTY LTD**

|         |                 |                    |
|---------|-----------------|--------------------|
| Company | ACN 102 865 823 | ABN 24 102 865 823 |
|---------|-----------------|--------------------|

Commercial and residential 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 |
|---------|-----------------|--------------------|

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.

**NIEPE CONSTRUCTIONS PTY LTD**

|         |                 |                    |
|---------|-----------------|--------------------|
| Company | ACN 122 112 752 | ABN 65 122 112 752 |
|---------|-----------------|--------------------|

Niepe is a leading civil structures subcontractor based in Brisbane and Perth, with a team of skilled labour supported by engineers, project management and site supervisors.

**JKJ CONSTRUCTIONS PTY LTD**

|         |                 |                                       |
|---------|-----------------|---------------------------------------|
| Company | ACN 672 098 574 | ABN 93 672 098 574<br>(49% ownership) |
|---------|-----------------|---------------------------------------|

JK Constructions NT (JKJ) is a majority Aboriginal-owned construction company delivering high-quality residential and commercial projects across Northern Australia.

**WELLNESS GREEN PTY LTD**

|         |                 |                    |
|---------|-----------------|--------------------|
| Company | ACN 676 833 588 | ABN 31 676 833 588 |
|---------|-----------------|--------------------|

Wellness Green is a leading workplace wellbeing provider working with government bodies and project owners to deliver a new standard of wellness across major construction, infrastructure and mining sites.

**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.

**EAST COAST COMMERCIALS**

|         |                    |
|---------|--------------------|
| Company | ABN 71 011 036 285 |
|---------|--------------------|

Vehicle dealer and retailer offering the best range of used light commercial and 4x4 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.

**PRIME METRO BMD CORPORATION**

|         |   |
|---------|---|
| Company | CRN CS201712551 (registered in the Philippines - 40% ownership) |
|---------|---|

Prime BMD delivers complex infrastructure in the Philippines, with integrated global perspective and expertise.

**BMD GLOBAL SERVICES CORP.**

|         |  |
|---------|--|
| Company | CRN 2024010132415-61 (registered in the Philippines) |
|---------|--|

BMD Global Services Corporation is a dedicated corporate support entity which provides corporate business support services to the BMD Group of companies.

**BMD INFRASTRUCTURE SERVICES LTD**

|         |   |
|---------|---|
| Company | CRN 14400095 (registered in the United Kingdom) |
|---------|---|

BMD Infrastructure Services delivers tailored civil infrastructure solutions across diverse project environments. Backed by the same expertise and standards as BMD Constructions in Australia, the business provides agile, high-quality outcomes that align with project objectives.

**EMPOWER ADVISORY LTD**

|         |   |
|---------|---|
| Company | CRN 04224572 (registered in the United Kingdom) |
|---------|---|

Empower is a trusted delivery partner and strategic advisor, helping organisations navigate the complexities of large-scale infrastructure projects across the United Kingdom and Australia.



# OUR SUPPLY CHAINS

**BMD works with suppliers who share our values, ethics and commitment to sustainable business practices, including the protection of human rights. We recognise that modern slavery risks can vary depending on industry, geographic location and company size.**

All suppliers, contractors and consultants are required to comply with relevant modern slavery legislation and BMD's policies as a condition of engagement. These requirements are embedded in our procurement contracts, including purchase orders and supplier agreements. Employees are responsible for preventing, identifying and reporting any concerns related to modern slavery within BMD's operations and supply chains.

Our supply chain supports diverse operational needs, particularly within our engineering and construction businesses. In the 2024–2025 financial year, BMD (excluding Urbex and Empower, which have minimal procurement spend apart from staffing) spent approximately \$1.36 billion with over 4,500 subcontractors, suppliers and consultants.

Purchased goods and services include construction materials, uniforms, personal protective equipment (PPE), stationery, machinery, equipment hire, car and fleet leasing, design and architecture, communications, traffic management, security, waste, recycling, information and communication technologies, insurance, legal and environmental products. These are primarily sourced from suppliers operating in Australia, the United Kingdom and the Philippines with some items procured internationally through multi-tiered supply chains.

## **Key procurement categories include:**

- ▶ **Labour** – direct employment, contractors and labour hire arrangements, all in accordance with applicable laws and regulatory requirements in each jurisdiction
- ▶ **Materials** – quarry products, concrete, asphalt and other construction inputs sourced locally or internationally
- ▶ **Plant and equipment** – owned, leased and hired machinery and tools used across BMD's global operations.

BMD is committed to proactively identifying and mitigating these risks across all tiers of our global procurement footprint, ensuring our supply chains reflect our corporate values and ethical standards.



# UNDERSTANDING OUR MODERN SLAVERY RISKS

BMD's core operations in engineering, construction and the use of natural resources, bring an inherent responsibility to identify and manage modern slavery risks within our supply chains. While overall risk is considered low, ongoing monitoring remains essential.

The majority of BMD's workforce is based in Australia and protected by robust federal and state/territory laws. Our operations in the United Kingdom and the Philippines are similarly governed by local legislation and BMD internal policies. Direct imports of materials are minimal, with most goods sourced locally from reputable suppliers who comply with relevant modern slavery laws. However, we recognise that risk may arise through international supply chains, whether via overseas suppliers or local suppliers sourcing components globally.

Certain procurement categories such as information and communication technologies equipment, uniforms and PPE, stationery supplies, and project-specific casual labour hire present heightened risks of modern slavery. To address this, BMD will engage targeted supply chain partners through a modern slavery questionnaire in 2026, strengthening transparency and compliance.

We maintain ongoing engagement with key supply chain and joint venture partners across all regions to understand and improve their processes for managing modern slavery risks (see Consultation Process for more detail). This commitment to collaboration supports continuous improvement in our approach to identifying and mitigating risks wherever we operate.



# ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

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BMD has implemented risk management processes to proactively identify, assess, and mitigate modern slavery risks within our operations and supply chains. Our approach is grounded in transparency, accountability and continuous improvement.

## 1. CONTRACTUAL CONTROLS

BMD is actively reviewing its procurement contracts—including purchase orders, labour hire and supplier agreements—to ensure they contain mandatory modern slavery clauses. These clauses will require suppliers to comply with applicable laws and notify BMD of any breaches. BMD will retain the right to conduct audits to verify compliance.

## 2. DUE DILIGENCE

Supplier onboarding includes verification and audit checks across all regions. BMD conducts regular assessments to ensure suppliers meet our ethical standards and human rights obligations.

## 3. SUPPLIER CODE OF CONDUCT

Our Supplier Code of Conduct sets clear expectations for ethical behaviour and explicitly prohibits modern slavery practices. It is communicated globally and reinforced through ongoing engagement.

## 4. SERIOUS MISCONDUCT DISCLOSURE POLICY

Employees are empowered to confidentially report concerns related to modern slavery through BMD's Serious Misconduct Disclosure Policy. Any potential breaches are escalated internally to the senior leadership team for review and appropriate action.

## 5. TRAINING AND AWARENESS

All employees complete annual modern slavery training as part of BMD's Global Core Induction. Targeted training is provided to roles with supply chain responsibilities. Additional workshops are held for staff directly involved in procurement and supplier management.

## 6. CONTINUOUS IMPROVEMENT

BMD continues to strengthen its approach to modern slavery risk management. In 2024, a targeted gap analysis identified areas for improvement, leading to updates in procurement practices, supplier onboarding and employee training. Actions from this assessment have continued into 2025 and remain a focus of our compliance efforts.

## 7. OVERSIGHT AND GOVERNANCE

The Audit and Risk Committee (ARC) oversee compliance with modern slavery laws and reviews the effectiveness of controls and processes. The Sustainability (EESG) Committee provides additional oversight on governance and ethical sourcing.

## 8. EFFECTIVENESS REVIEW MECHANISMS

To assess the impact of our actions, BMD has implemented:

- ▶ internal compliance audits and supplier due diligence reviews
- ▶ monitoring of reported concerns, including through confidential channels
- ▶ tracking of supplier onboarding outcomes and contract terminations due to non-compliance
- ▶ annual supply chain analysis and stakeholder engagement
- ▶ integration of feedback into policy updates and training programs.

## REMEDIATION

Actual or suspected instances of modern slavery are escalated to BMD's senior leadership team, who undertake investigations and recommend appropriate actions to the BMD Group Board. Remedial measures may include contract termination, targeted training, enhanced audits or updates to internal procedures. BMD remains committed to supporting affected individuals and continually strengthening its preventative framework.

No incidents of modern slavery were identified during the 2024–2025 financial year.



# ASSESSING THE EFFECTIVENESS OF ACTIONS TAKEN

Throughout 2025, BMD strengthened engagement with supply chain partners to gain deeper insights into their operations and potential modern slavery risks. By working closely with these partners, we remain proactive in identifying, managing and addressing any instances of modern slavery.

The ARC regularly reviews the effectiveness of our actions and processes to address modern slavery risk across all jurisdictions. The Sustainability (EESG) Committee provides additional oversight and guidance on BMD's Economic, Environmental, Social and Governance Strategy, including compliance with related laws and policies.

A comprehensive business-wide materiality assessment and gap analysis conducted in 2024 informed the development of BMD's sustainability priorities, which are structured around four key pillars: enhancing our environment, prioritising our people, creating enduring legacies and ensuring positive business sustainability.

As part of ongoing improvement, BMD is integrating modern slavery risk considerations into supplier onboarding via a major ERP platform upgrade, ensuring a more transparent and accountable approach to supply chain engagement.

# APPROVAL AND CONSULTATION PROCESS

The development of this Statement was led by BMD's Procurement function and involved consultation with key stakeholders across the Group, including senior management, legal, procurement, communications, and representatives from relevant reporting entities. This cross-functional engagement ensured that the Statement reflects the operational realities and modern slavery risks across BMD's business units and jurisdictions.

Consultation also extended to supply chain partners in Australia, the United Kingdom and the Philippines, with a focus on understanding their structures, practices

and potential exposure to modern slavery risks. These discussions informed BMD's continuous improvement efforts and supported alignment with responsible sourcing expectations.

The Statement was reviewed by the senior leadership team and formally approved by the BMD Group Board in accordance with the Australian Modern Slavery Act 2018. It was signed by the Group Chief Executive Officer on behalf of all reporting entities covered by the Statement.



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CREATING LEGACIES.