

# Modern Slavery Policy

This policy applies to SHAPE Australia Corporation Limited and its related bodies corporate, pursuant to the Corporations Act 2001 (Cth) (“**SHAPE**”).

SHAPE has a zero-tolerance approach to all forms of modern slavery within its operations and supply chains. SHAPE is committed to acting ethically and with integrity in all its business dealings and relationships.

This policy outlines SHAPE’s commitment to complying with the requirements of the Modern Slavery Act 2018 (the Act), by ensuring all individuals working on behalf of SHAPE are aware of our commitment to the prevention, detection and reporting of modern slavery in any part of SHAPE’s operations and supply chains.

## Who is SHAPE?

SHAPE is a head contractor or construction manager on construction projects. It is an ASX listed company with over 600 employees, operating in every state and territory of Australia. In Queensland, SHAPE operates its business through a fully owned subsidiary named SHAPE Australia (Qld) Pty Limited.

## What is modern slavery?

Under the Act, modern slavery takes various forms including trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour (including where children are subjected to slavery or similar practices, or engaged in hazardous work).

## How is SHAPE addressing modern slavery?

SHAPE is committed to implementing policies and procedures that are designed to be proactive in addressing all forms of modern slavery risks in our operations and supply chains, including the prevention, detection and reporting of modern slavery practices. We are committed to influencing people at all levels of our supply chains to do the same. To put these commitments into practice, SHAPE has resolved to:

- Educate its staff, contractors and suppliers about the risks of modern slavery practices
- Identify and monitor our supply chains, particularly those that are at the greatest risk of being prone to modern slavery practices
- Ensure we do not directly or indirectly engage contractors or suppliers who may engage in modern slavery practices
- Report and take other appropriate action if any modern slavery practices are discovered in our operations and supply chains; and
- Measure the effectiveness of our systems on an ongoing basis, so that we may continuously refine and improve our policies and processes.

## Code of Conduct

Anyone working on SHAPE’s behalf, including employees, contractors or suppliers must familiarise themselves and comply with the Modern Slavery Code of Conduct (**Code**) set out in the annexure to this policy.



Peter Marix-Evans

Director

SHAPE Australia Corporation Limited

19 March 2024



SHAPE

# Modern Slavery Code of Conduct

## Purpose

The purpose of this Code is to clearly articulate SHAPE's expectations and requirements for all employees, contractors and suppliers in relation to our commitment to identify and address all forms of modern slavery risks in our operations and supply chains.

## Conduct

SHAPE expects anyone working on our behalf, including contractors and suppliers at all levels of our supply chains to:

1. Ensure all work in our operations and supply chains is freely chosen, without the use of coercion, threats or deception to exploit any person or undermine their freedom
2. Respect the freedom of movement of workers, and to not engage in physical confinement or confiscation of identity and travel documents, or taking any other action to prevent workers from terminating their employment
3. Ensure workers in its operations and supply chains are of legal age, and to prevent any form of child labour
4. Provide fair working conditions for employees, including adequate rest periods, sufficient leave, freedom of association and collective bargaining in accordance with relevant local laws
5. Pay workers lawful wages, including equal pay for equal work
6. Ensure bullying, harassment and discrimination, physical, sexual, psychological or verbal harassment or abuse is not tolerated
7. Where migrant workers are used, ensure that they are employed on the same terms as local workers in accordance with relevant local laws and not require migrant workers to surrender identification documents
8. Undertake risk assessments within their organisation and supply chains to ensure compliance with the Act
9. Comply with the Act and maintain a zero-tolerance approach to modern slavery practices in their organisation and supply chains, including by ensuring that their subcontractors and suppliers (at any level of the contracting chain) comply with the Act and this Code of Conduct.

## Raising Concerns

You must notify SHAPE as soon as possible if you believe or suspect that any modern slavery practices may be present within SHAPE's operations or supply chains. This may be notified in accordance with SHAPE's *Whistleblower Protection Policy*, a copy of which is available on the "About > People & Culture" page of our public website [here](#).

## Compliance

SHAPE has zero tolerance to any form of modern slavery.

Any person or entity who fails to comply with this policy, including by:

- Directly engaging or otherwise knowingly being involved in a modern slavery practice; or
- Failing to report a modern slavery practice within SHAPE's operations or supply chains that they are or ought to be aware of

will face sanctions (including but not limited to contracts being terminated and being precluded from performing future work for SHAPE) and, in relevant cases, will be referred to the relevant authorities.

## Further Information

If you have any questions or would like to speak to someone at SHAPE about this Code, please do not hesitate to contact Shane Morgan, SHAPE's EHSQ Manager – Procurement & Policy, on 03 9690 9555.