5 IMS Industrial Relations Policy

Version Number: 3 Issue Date: February 2026

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A Purpose

This policy defines PreBuilt's commitment to compliant, ethical and effective industrial relations practices and establishes the governance framework for the management of industrial relations risks within the Integrated Management System (IMS).

This policy supports PreBuilt's commitment to lawful employment practices, ethical labour standards, productivity, dispute prevention and sustainable project delivery across all operations.

B Policy Statement

PreBuilt is committed to maintaining compliant, ethical and fair industrial relations practices that support safe, productive and sustainable project delivery. We proactively manage industrial relations risks across our operations to minimise disruption, ensure legal compliance and maintain constructive working relationships with employees, subcontractors and their representatives. PreBuilt promotes open, transparent and constructive engagement with employees, subcontractors and their representatives in all matters relating to industrial relations. Effective client, people and project management is based on open, honest relationships and realistic negotiations that are beneficial to both parties.

Industrial relations risks are identified, assessed and managed through PreBuilt's risk management and project governance processes. PreBuilt does not tolerate unlawful industrial conduct, coercion, discrimination or exploitation in any part of its operations or supply chain. PreBuilt is committed to the continual improvement of its industrial relations management practices through monitoring, review and corrective action processes within the Integrated Management System.

C Scope and Application

This policy applies to:

- All employees of PreBuilt Residential (ABN 76 103 794 743) and PreBuilt Commercial (ABN 45 115 360 524).
- Contractors, subcontractors, consultants, labour hire personnel and suppliers engaged by PreBuilt.

This policy is communicated through induction, training and procurement processes and is available upon request.

D Legislative and Compliance Framework

PreBuilt's Industrial Relations Management framework is designed to comply with applicable Commonwealth and State industrial relations, employment and modern slavery legislation in all jurisdictions in which PreBuilt operates.

Relevant legislation includes, but is not limited to:

- Fair Work Act 2009 (Cth).
- Modern Slavery Act 2018 (Cth).
- Fair Work Regulations 2009 (Cth).

- Applicable State and Territory industrial relations legislation.
- Relevant anti-discrimination and equal opportunity legislation.
- Applicable Work Health and Safety legislation.

PreBuilt maintains documented processes to identify, access and periodically evaluate compliance with applicable industrial relations, employment and modern slavery legislation across its operations and subcontractor engagements. Compliance obligations are reviewed through internal monitoring and Integrated Management System Management Review processes.

E IR Objectives, Targets and Controls

PreBuilt aims to minimise lost time, downtime and unproductive work practices that arise through industrial relations gr
ievances or disputes. We encourage proactive, two-way consultation between parties, with consideration of both parties' requirements, when managing industrial relations matters.

Ethical Labour and Modern Slavery Prevention

- Prohibiting all forms of modern slavery, including forced labour, child labour, debt bondage, human trafficking and deceptive recruitment practices, and taking reasonable and proportionate steps to prevent such practices within PreBuilt's operations and labour supply arrangements.
- Ensuring all workers engaged directly or through labour hire arrangements are employed voluntarily, retain control of their identity documents, are not charged recruitment fees, and receive lawful wages and entitlements in accordance with applicable industrial instruments.
- Requiring subcontractors and labour hire providers to comply with PreBuilt's Supplier Code of Conduct, including obligations relating to ethical labour practices and modern slavery prevention.

Legislative Compliance and Industrial Management

- Maintaining compliance with applicable industrial relations, employment and workplace legislation across all jurisdictions in which PreBuilt operates.
- Recognising that client requirements may influence project-specific industrial arrangements while ensuring compliance with applicable legislation and contractual obligations.
- Advising clients within 24 hours of becoming aware of any industrial relations or WHS matter that may materially impact the construction program or contractual obligations.

Workplace Rights and Fair Treatment

- Respecting freedom of association rights in accordance with the Fair Work Act 2009 (Cth).
- Providing equal employment opportunity and prohibiting discrimination, harassment or victimisation in accordance with applicable Commonwealth and State anti-discrimination legislation.

Subcontractor and Labour Hire Compliance

- Requiring subcontractors and labour hire providers to comply with applicable awards, workplace arrangements and employment legislation prior to and during engagement.
- Reserving the right to request reasonable evidence of compliance with industrial relations, wage, award and Fair Work Act obligations and to suspend or terminate engagement where serious non-compliance is identified.

F Governance and Responsibilities

PreBuilt is committed to maintaining compliant, ethical and fair industrial relations practices across its operations and projects. Responsibility for implementation and oversight of this Policy is allocated as follows:

- Senior Management is responsible for leadership, ensuring adequate resourcing, and overall oversight of industrial relations compliance within the business, including ensuring industrial relations risks are identified, assessed and managed through tendering, project planning and risk register processes.
- The Compliance Manager is responsible for monitoring legislative developments, reviewing subcontractor and labour compliance matters, and overseeing escalation of any reported industrial relations or ethical labour concerns.
- The IMS Manager is responsible for maintaining this Policy within the Integrated Management System, ensuring document control, and coordinating periodic review through Management Review processes.
- Procurement and Project Managers are responsible for ensuring subcontractors comply with applicable industrial relations obligations and PreBuilt's Supplier Code of Conduct prior to and during engagement.
- Supervisors and Managers are responsible for monitoring site-level compliance and reporting any concerns through established reporting channels.
- All workers must comply with applicable industrial relations laws, awards and agreements, and report concerns in good faith.

G Monitoring and Evaluation of Effectiveness

PreBuilt monitors indicators relevant to industrial relations performance and compliance, which may include:

- Number and nature of industrial disputes or grievances
- Lost time attributable to industrial relations matters
- Subcontractor compliance confirmations
- Completion of relevant compliance training
- Compliance audit outcomes relating to subcontractor industrial relations obligations.

PreBuilt is committed to maintaining an efficient and fair work environment and to continuously reviewing and improving industrial relations practices. Outcomes of monitoring activities are reviewed as part of the Management Review process under the Integrated Management System.

H Right of Entry

Prebuilt acknowledges the right of entry to union officials who hold valid entry permits to enter its business for specific purposes:

- To investigate a suspected breach of the Fair Work Act 2009 (Cth) (FW Act) or a term of a fair work instrument such as a modern award or enterprise agreement and the suspected breach affects or relates to a member of the official's union who performs work on the site and the official's union is entitled to represent the member's interest
- To hold discussions with employees that the permit holder's union is entitled to represent, perform work on the site and wish to participate in these discussions.

Union officials may:

- Investigate suspected breaches
- Hold discussions
- Perform inspections and other functions under applicable WHS legislation.

Before entering a site, a union official must:

- Hold a valid federal permit, and

- Provide at least 24 hours written notice of entry, unless entry is under applicable WHS legislation.

Management of Right of Entry is subject to the relevant provisions outlined in state and federal laws.

I Freedom of Association

Prebuilt acknowledges that employees and sub-contractors have a right to belong or not to belong to any industrial association they choose, without it affecting their employment. For employees 'industrial association' generally refers to a union. This means that, all things being equal, an employee who is a member of a union (or other association) should not be treated less favourably than an employee who is not a member of a union. The reverse is also true.

J Dispute Resolution and Grievance Procedure

All parties are required to make every effort to resolve grievances or disputes with their employees and applicable parties at the appropriate level, in accordance with the procedure outlined in the relevant award or workplace arrangement. The parties are committed to continue working towards the elimination of lost time through close consultation and cooperation with those directly affected, and through the effective operation of these Grievance/Disputes Settlement Procedures as outlined:

Step 1 – Written Notice of Dispute

A party identifying a dispute must provide written notice to the other party, outlining the nature of the dispute and the relevant contractual provisions

Step 2 – Project-Level Resolution

The Project Manager and relevant representatives meet within 5 business days of notice to attempt resolution in good faith

Step 3 – Senior Management Escalation

If the dispute is not resolved within 10 business days, the matter is escalated to Senior Management representatives of each party.

Senior Management will meet within 10 business days to seek resolution

Step 4 – Alternative Dispute Resolution (ADR)

If unresolved, the dispute will be referred to mediation conducted by an independent, appropriately qualified mediator in accordance with the contract.

The parties will participate in mediation in good faith before commencing litigation, unless urgent relief is required.

Step 5 – Further Determination

If mediation is unsuccessful, the dispute may proceed to expert determination, adjudication, arbitration or litigation, as provided under the relevant contract.

K Related Policies

This Policy operates in conjunction with:

- Voluntary Modern Slavery Policy
- Supplier Code of Conduct

- Work Health and Safety Policy
- Whistleblower Policy
- Anti-Corruption Policy.

Document revision history

Version	Date	Description of Change	Approved By
1.0	Feb 2020	Initial IR Policy issued	Chief Executive Officer
2	Dec 2022	Policy updated to align with IMS structure	Chief Executive Officer
2.1	Aug 2024	Minor updates to responsibilities and review dates	Chief Executive Officer
3	Feb 2026	Policy rewritten for enhanced alignment with governance	Chief Executive Officer

Malcolm Batten
CEO

Last Review Date: Feb 2026
Next Review date: Feb 2028