5 IMS VOLUNTARY MODERN SLAVERY POLICY

Version Number:	2	Issue Date:	February 2026

PreBuilt is not currently a reporting entity under the Modern Slavery Act 2018 (Cth) but voluntarily aligns its practices with the Act. This policy is not currently registered on the Modern Slavery Statements Register as PreBuilt is not a mandatory reporting entity.

A Purpose

This policy defines PreBuilt's commitment to preventing modern slavery and promoting ethical procurement across our operations and supply chains. It establishes the governance framework for identifying, assessing and addressing modern slavery risks as part of PreBuilt's commitment to human rights and responsible business conduct.

B Policy Statement

PreBuilt designs, manufactures and installs prefabricated and modular buildings for residential and commercial applications across Australia. We recognise that modern slavery can occur in construction supply chains, particularly those involving imported materials, labour hire, offshore manufacturing and complex subcontracting arrangements.

PreBuilt is committed to conducting business ethically, with integrity and respect for human rights, and to taking reasonable and proportionate steps to identify, assess and address modern slavery risks in our operations and supply chains.

The management team, led by the Chief Executive Officer, is accountable for establishing, implementing and maintaining this policy and for ensuring compliance with modern slavery legislation.

PreBuilt is committed to:

- Prohibiting modern slavery in all its forms, including forced labour, child labour, human trafficking, servitude, debt bondage, deceptive recruiting and the worst forms of child labour.
- Complying with applicable modern slavery, labour and human rights legislation in all jurisdictions in which we operate.
- Identifying, assessing and addressing modern slavery risks in our operations, supply chains and business relationships through a risk-based due diligence approach, with enhanced focus on higher-risk materials, services, labour arrangements and geographic regions.
- Identifying higher-risk suppliers based on sector, geography and labour intensity.
- Embedding ethical procurement practices that consider human rights and labour standards alongside price, quality and delivery.
- Engaging with suppliers, contractors and labour hire providers and requiring them to uphold ethical labour practices, including contractual obligations to take reasonable steps to identify and address modern slavery risks within their own operations and supply chains.
- Providing safe and accessible mechanisms for reporting modern slavery concerns without fear of reprisal.
- Building awareness and capability among employees, contractors and suppliers to identify and prevent modern slavery risks.
- Ensuring key personnel complete modern slavery awareness training and refresh as needed.

- Taking appropriate and timely remedial action where modern slavery risks or incidents are identified, including working with suppliers to implement corrective action plans within defined timeframes and, where remediation is not feasible, disengaging responsibly.
- Continually improving our approach through monitoring, review and alignment with evolving best practice.

C Scope and Application

This policy applies to PreBuilt Residential (ABN 76 103 794 743) and PreBuilt Commercial (ABN 45 115 360 524) and covers:

- All employees of PreBuilt Residential and PreBuilt Commercial.
- All contractors, subcontractors, labour hire workers, consultants and suppliers.
- All procurement activities, including materials, products, services, labour and equipment.
- All PreBuilt operations, including design, manufacturing, construction, transport and installation.

The policy is communicated through induction, subcontractor onboarding processes, contractual documentation and is accessible via PreBuilt's project management systems.

D Legislative Framework

PreBuilt complies with relevant modern slavery and labour rights legislation, including:

- Modern Slavery Act 2018 (Cth)
- Modern Slavery Act 2018 (NSW)
- Criminal Code Act 1995 (Cth) (Divisions 270 and 271)
- Fair Work Act 2009 (Cth)

PreBuilt also aligns with internationally recognised human rights standards, including the UN Guiding Principles on Business and Human Rights and ILO Core Conventions.

E What Is Modern Slavery

Modern slavery refers to serious exploitation involving coercion, threats or deception that undermines a person's freedom. It includes trafficking in persons, slavery, servitude, forced labour, debt bondage, forced marriage, deceptive recruiting and the worst forms of child labour.

Substandard working conditions and underpayment are not modern slavery in themselves but may indicate heightened risk.

F Modern Slavery Risks

PreBuilt has conducted risk assessments to identify modern slavery risks within our operations and supply chains. Based on this assessment, PreBuilt has identified the following areas of potential modern slavery risk:

Operations:

- Labour hire and temporary workforce arrangements.
- Migrant or overseas workers.
- Cleaning, security and logistics services.

Supply Chains:

- Imported materials (including steel, timber, textiles, electronics and building products).
- Offshore manufacturing and fabrication.
- Labour-intensive services.
- Multi-tier supply chains with limited transparency.

Structural Risk Indicators:

- Abnormally low pricing or compressed timeframes.
- High labour turnover or reliance on casual labour.
- Limited supplier visibility or oversight.

Risk assessments are conducted at least annually and at project level where procurement risk warrants enhanced due diligence.

G Governance and Responsibilities

- Senior Management is responsible for leadership, resourcing, integration of modern slavery considerations into procurement and risk management processes, and approval of any Modern Slavery Statements or related disclosures.
- The Compliance Manager is responsible for monitoring regulatory developments, overseeing modern slavery risk controls, reviewing higher-risk supplier classifications, and managing escalation of reported concerns.
- The IMS Manager is responsible for maintaining this Policy within the Integrated Management System, coordinating the annual supply chain risk review, tracking Supplier Code acknowledgements, and ensuring inclusion of modern slavery compliance in Management Review.
- Procurement and Construction Managers implement supplier screening through prequalification checklists, contractual controls and engagement documentation, and escalate concerns where identified.
- Project Managers and Supervisors monitor working conditions, contractor practices and site-level indicators of exploitation and report concerns through established reporting channels.
- All workers must comply with this policy, remain alert to potential risks, report concerns in good faith, and participate in required training.

H Due Diligence and Ethical Procurement

PreBuilt applies a risk-based due diligence approach that includes:

- Confirmation of compliance through subcontractor onboarding documentation and contractual undertakings.
- Contractual modern slavery clauses.
- Enhanced due diligence for higher-risk suppliers and categories.
- Monitoring, verification and investigation of red flags.
- Corrective action and remediation where risks are identified.

Procurement decisions consider ethical and social factors alongside commercial considerations, prioritising value over lowest cost.

I Reporting and Grievance Mechanisms

Concerns may be raised internally with managers, the HSEQ Advisor or senior management, or externally with appropriate authorities. Reports may be made confidentially and without retaliation. All reports are assessed, investigated and addressed appropriately.

J Measuring Effectiveness

PreBuilt measures the effectiveness of actions to address modern slavery risks through:

- Supplier Code of Conduct acknowledgment embedded in onboarding process.
- Supplier engagement and compliance with modern slavery requirements.
- Grievance reports received and resolved.
- Modern slavery awareness training completion rates.
- Results are reviewed annually and used to drive continuous improvement.

K Monitoring and Review

This policy and related controls are reviewed regularly through supplier reviews, grievance monitoring, audits and management review processes. Continuous improvement is driven through lessons learned, stakeholder engagement and alignment with evolving best practice.

L Policy Review and Approval

This policy is reviewed at least every two years or sooner if material changes occur.

Document Revision History

Version	Date	Description of Change	Approved By
1.0	Jan 2020	Initial Modern Slavery Policy issued	Managing Director
1.1	Dec 2022	Reviewed, reformatted and review date updated	Chief Executive Officer
1.2	Apr 2024	Reviewed, reformatted and review date updated	Chief Executive Officer
2.0	Feb 2026	Policy rewritten to align with Modern Slavery Act guidance and renamed	Chief Executive Officer

Approved by:

Signed:
Name: Malcolm Batten
Position: Chief Executive Officer
Date: 6/2/2026

New Review Date: February 2027