



Modern Slavery Policy

Recognition of the Modern Slavery Act 2018

DNA Construction has a zero-tolerance approach towards modern slavery and human trafficking in all its forms. We will not knowingly engage in or support any activities that involve modern slavery, forced labour, or human trafficking.

Modern slavery refers to any situation where violence, threats, coercion, or deception are used to exploit people for personal or commercial benefits. We recognise the Modern Slavery Act 2018 (the Act) and undertake practices to adhere to this within our business and supply chain. We will take meaningful action to ensure our conduct is aligned to the Act and reasonable steps to address any breaches of this Act within the business.

Human Rights

All employees and workers shall be treated with dignity and not be subjected to suffer any harassment, physical or mental punishment or other forms of abuse.

DNA Construction promotes effective employee engagement throughout our operations and welcome open sincere feedback from employees on all matters of the company's business interest.

We employ a grievance policy, which is transparent, equitable and predictable to enable the remediation of any abuse of human rights and its impacts that may arise in its operations.

Forced Labour

DNA Construction does not engage in or support the use of forced or compulsory labour, or bonded / involuntary prison labour.

Employees are free to leave at any time, but are expected to provide reasonable notice in line with their individual contracts of employment or industrial instrument.

All employees provide their services to us on an entirely voluntary basis, and no one shall be forced to remain in their employment against their will.

Child Labour

DNA Construction is committed to ensuring compliance with all employment law requirements with respect to those who are under the age of 18. The business will endeavour to include the child's parent or legal guardian with respect to any employment management processes.

Assessing our supply chain

DNA Construction only employs staff using Workplace agreements, relevant Fair Work awards or individual agreements, and provides all staff a copy of the Fair Work Information Statement explaining the National Employment Standards, their freedom of association and workplace rights.

The nature of our construction work means we must regularly rely on manual labour too, both skilled and unskilled. This labour may come from regions or demographics that are at a higher risk of exploitation, including migrant workers or those from economically disadvantaged backgrounds. Therefore, we partner with regulated labour hire companies to ensure these workers are also covered by applicable awards and workplace laws, and Work Cover.

Whilst we have not identified any instances of modern slavery occurring directly within our supply chain, we acknowledge that there are factors within the construction industry that contribute to modern slavery globally. Supply chains in construction are often multi-tiered, extensive, and complex, involving subcontractors and suppliers both directly and indirectly who are responsible for manufacturing and delivering materials, equipment, and services essential to our projects. We also procure goods and services directly, such as site establishment materials, safety gear, clothing for uniforms and consumables including fixings, stationery, and cleaning goods.

We will seek to include prohibitions against modern slavery practices in our contracts with our regular subcontractors and suppliers, to highlight the issue of modern slavery and promote an ethical and transparent supply chain, plus request they likewise engage their suppliers and provide us with ongoing feedback and information on their operations and labour practices relating to modern slavery.

Reporting and Compliance

Any instances of modern slavery or human trafficking identified within DNA Construction, or its supply chains, must be immediately reported to management. Reports will be investigated promptly, and appropriate remedial action taken in accordance with applicable laws and regulations, in consultation with the Australian Federal Police and/or an organisation like Anti-Slavery Australia.

Relevant Policies and other documents

Employee Handbook, Section 17 - Grievance Procedure

Jason Stokes
Chief Operating Officer

on behalf of **DNA Construction Pty Ltd**

Date: April 2025

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