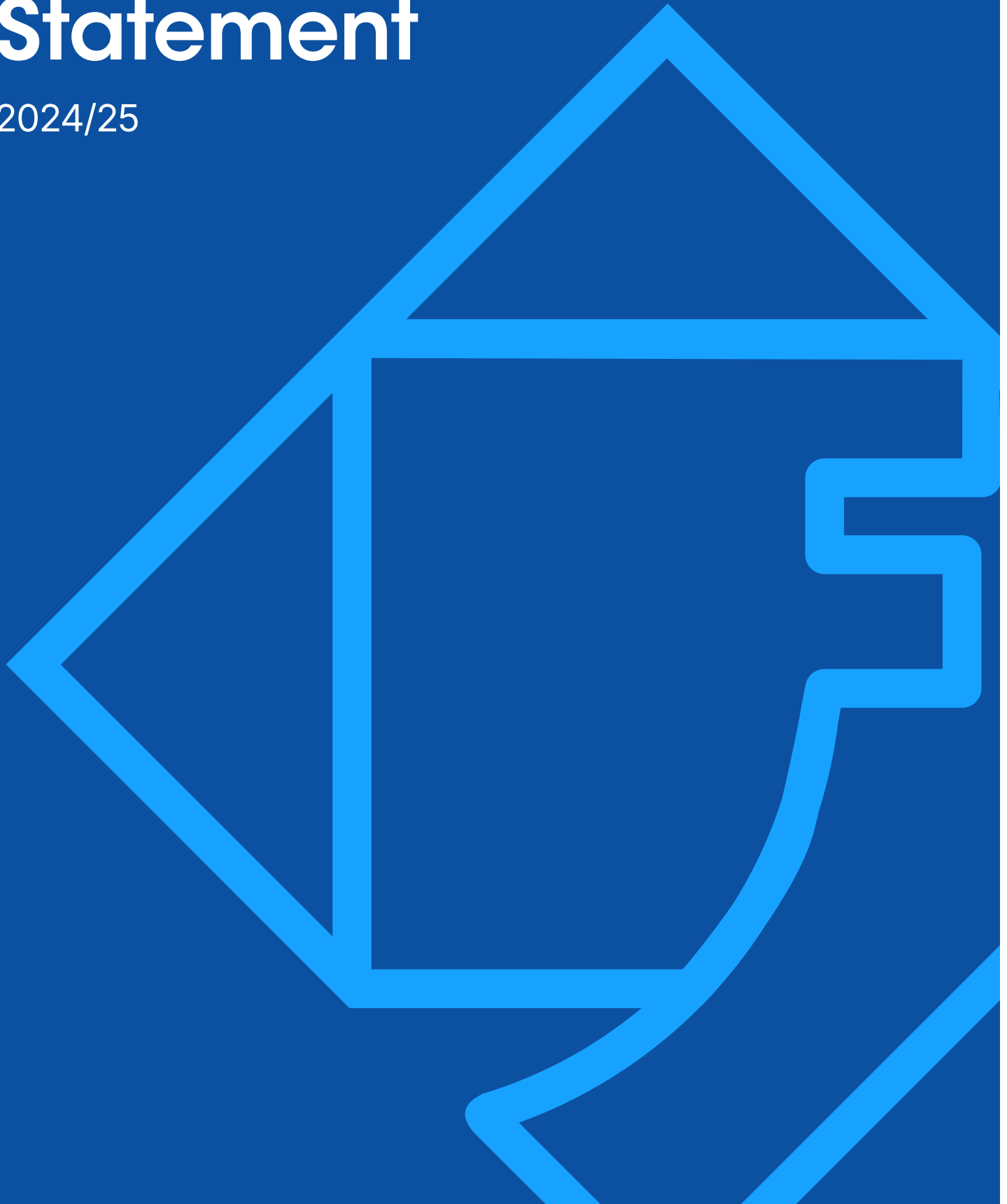




# Modern Slavery Statement

2024/25

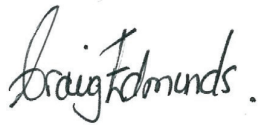


# Introduction

This Modern Slavery Statement 2024/25 ("Statement") is made on behalf of Fairbrother Pty Ltd and its controlled subsidiaries ("Fairbrother") in accordance with the Modern Slavery Act 2018 (Cth) for the financial year ended June 30, 2025. This is our sixth statement under the Act, reflecting our ongoing commitment to identifying and addressing modern slavery risks within our operations and supply chains.

There have been no material changes in our structure or operations during 2024/25.

This Statement has been endorsed by the Board of Fairbrother Pty Ltd



**Craig Edmunds**

Chairman

December 2025

# Overview



Fairbrother Pty Ltd is a privately-owned building and construction company operating solely within Australia, with offices in Tasmania and Victoria. Our wholly owned subsidiary, Degree C Pty Ltd, is a multi-trade contracting company headquartered in Ulverstone, Tasmania. We have also established a charitable foundation and trust.

Fairbrother is majority-owned by the Fairbrother family, with an active employee shareholder scheme now comprising 16.7% of shares held by key management employees. Across the group, we directly employ approximately 740 employees.

Our areas of expertise include:

- Commercial and industrial construction
- Joinery
- Facility management and maintenance
- Air-conditioning and refrigeration (commercial and residential)
- Steel fabrication
- Electrical contracting (commercial, industrial and residential)

We are proud of our reputation for quality, innovation, and collaboration, and our workforce is central to our success.



Our strong culture and engagement with employees underpin our zero tolerance for modern slavery and our commitment to preventing exploitation in our operations and supply chains.

# Identifying the risks of modern slavery – our supply chains

Eliminating modern slavery risks is a natural extension of our people-centric values and guiding principles. Fairbrother and Degree C directly employ their workforce under Australian industrial agreements or common law contracts, with the exception of respected local labour hire firms for short-term needs.

Our direct workforce encompasses a diverse range of roles, including bid managers, estimators, design managers, construction managers, project managers, contract administrators, site managers, site foremen, and safety managers, as well as construction workers. This team is supported by professionals in finance, safety, information technology, and administration.

Our supply chain is predominantly Australian-based, with most products and services sourced from Australian registered businesses. We view our relationship with subcontractors as a partnership, and it is important to us that these contractors share our values and principles.

However, we recognise that the construction industry is a potentially high-risk sector due to its varied and complex supply chains. The industry's high demand for manual labour, including low-skilled roles, can be susceptible to exploitation.

Our largest spend categories include engaging subcontractors for specialist work, concrete, and reinforcing steel products.

Solar panels represent a heightened modern slavery risk within our supply chain, consistent with findings from the Walk Free 2023 Global Slavery Index, which identifies solar manufacturing—particularly polysilicon, ingot and wafer production—as a sector with significant exposure to forced labour.

Much of the global solar supply chain is concentrated in regions where credible reports highlight state-imposed labour programs, restricted audit access, and opaque lower-tier sourcing, especially in the extraction and processing of quartz and polysilicon. As solar products are increasingly used in construction, we recognise that these systemic risks may flow into our projects, and we are therefore prioritising enhanced due diligence, supplier engagement, and traceability measures to ensure solar components are sourced responsibly.



Fairbrother also sources a range of additional goods and services to support our overall business operations. These include:

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**Information and Communications Technology (ICT)**

Such as computer hardware and software, cloud-based services, document exchange platforms, printers, audio/visual equipment and services, and mobile phones.

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**Corporate Services**

Essential services for office management, including leasing, maintenance, utilities, cleaning, waste management and recycling services, and travel management.

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**Hospitality and Catering**

Services procured for both onsite and offsite events.

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**Other Professional Services**

Beyond project-specific design and engineering, we engage providers for taxation, external legal advice, insurance, banking and financial services, consulting, and professional and personal development.

**Site and Office Consumables**

General consumables for staff, including stationery, amenities, and kitchen supplies.

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**Safety and Branded Attire**

Personal protective equipment such as work boots, hard hats, safety glasses, hearing protection, gloves, workwear, high-visibility vests, and branded clothing.

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**Branded Merchandise**

Special event merchandise such as drink bottles, umbrellas and branded apparel.





We continue to work toward gaining a better understanding of our supply chain relationships and the ultimate source of the products we purchase. In 2025, we are introducing a modern slavery questionnaire for suppliers and subcontractors. The questionnaire comprises 16 questions addressing the following subject areas:

- Company information
- Policies and Governance
- Risk Management & Due Diligence
- Training and Awareness
- Remediation & Reporting
- Additional Information

This initiative aims to deepen our understanding of their commitment to ethical practices, identify potential risks, and foster a culture of transparency and continuous improvement. We intend to develop a risk rating based on the responses received, which will be used to initiate further investigation into those identified as being medium or high-risk suppliers.

# Actions taken to assess and address risks

Fairbrother engages constructively with the Australian Industrial Relations System and the Fair Work Act 2019, supporting compliance with fair wages and entitlements. We undertake robust due diligence on all significant suppliers and subcontractors before engagement, including pre-contract assessments and ongoing monitoring.

Key actions taken across our previous and current reporting periods include:

- Confirmation of compliance with Australian employment legislation
- Modern Slavery awareness training for all employees influencing purchasing, contracting, or labour hire decisions (integrated into onboarding)
- Updated procurement and contracting procedures to include Modern Slavery compliance questions
- Implementation of our Total Integrated Management System (TIMS), which includes policies such as Modern Slavery Policy, Whistleblower Protection, Procurement, and Diversity & Inclusion

New for 2025: We have engaged a dedicated Procurement Officer who will centralise a significant amount of purchasing across the group. This role will enhance our ability to monitor, assess, and address modern slavery risks, ensuring greater consistency and oversight in supplier engagement and compliance.

Additionally, we have committed to creating a Modern Slavery awareness information package for suppliers who show a limited understanding of this issue. This package will include clear explanations of what constitutes modern slavery, relevant legal obligations, and the risks associated with unethical labor practices. It will feature case studies, guidance on identifying red flags within supply chains, and practical steps suppliers can take to prevent modern slavery.

The information will be tailored to address the specific challenges faced by suppliers in our industry and will provide resources for further learning, such as links to government guidelines and support organisations. By distributing this package, we aim to raise awareness, foster greater supplier engagement, and support our partners in building more ethical and transparent business practices throughout our supply network.

We are also expanding our internal training for our employees to include refresher training. The purpose of this refresher training is to ensure that all staff members remain up-to-date on relevant procedures, policies, and best practices. A regular cycle helps reinforce important skills and knowledge, reducing the risk of errors and promoting a consistent standard across our organisation. Employees will be notified in advance about upcoming training sessions and given ample time to complete the requirements.



# Assessing effectiveness of actions

## **We will assess the effectiveness of our actions through:**

- Ongoing review of supplier and subcontractor compliance.
- Monitoring completion and outcomes of Modern Slavery training.
- Analysis of responses to our supplier questionnaire.
- Regular review of policies and procedures to ensure alignment with best practice and legislative requirements.

If higher risk areas are identified, we will work with procurement staff and suppliers to address these and ensure our commitment to eliminating modern slavery is upheld.





# Consultation with owned or controlled entities

## Consultation is achieved through:

- Shared leadership: Fairbrother's Chair also chairs the Degree C board; the CFO holds that position for both companies.
- Consistent reporting and resourcing via a shared business support team.
- Input from all senior management positions.
- A common governance framework.

This collaborative approach ensures alignment and consistency in our response to modern slavery risks across all entities.



# Other relevant information and human rights impact

Fairbrother is committed to upholding human rights and promoting ethical practices throughout our operations and supply chains. We recognise our responsibility to positively impact human rights by:

- Providing secure, fair employment opportunities.
- Supporting local communities through economic and social contributions.
- Maintaining high standards of workplace safety, diversity, and inclusion.

We continue to review our practices to ensure we do not inadvertently contribute to adverse human rights impacts and seek to promote favourable outcomes wherever possible.



# Appendix







# WHO WE ARE

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## OUR PURPOSE

To provide a workplace founded on Our Guiding Principles where our people can learn and grow to their highest potential

## OUR VISION

A symbol of excellence in the Australian construction industry

## OUR GUIDING PRINCIPLES

Our people have developed a core set of guiding principles that form the foundation of all company activities and decision-making processes. These guiding principles are a perpetual part of our company's character and remain constant in an ever-changing world. They are:

Valuing our people and their individual strengths as the company's greatest asset

Embracing quality in everything we do

Instilling honesty, integrity and professionalism in everything we do

Demonstrating and rewarding a never ending commitment to innovation and continuous improvement

Providing career path opportunities for all our people including ongoing training for skills advancement and development

Providing appropriate recognition, encouragement and reward to our employees for their accomplishments

Working together as a team for the achievement of a common goal

Providing unparalleled service to our customers

Having the courage to do the difficult things

Using open and effective communication at all times

Maintaining a proactive, positive, compassionate and caring attitude

Exhibiting loyalty to our company, our colleagues and our clients

Demonstrating a commitment to the health and safety of our people

Respecting and caring for the environment

Passionately believing in our company and our people

Working to receive a satisfactory profit for our work

Contributing as good corporate citizens to the well-being of our community on an ongoing basis

## OUR VALUES

Our people above all else

Honesty and integrity at all times

Quality work as the accepted standard

Innovation and continuous improvement

Community contribution

Kurt Arnold  
Chief Executive Officer  
FAIRBROTHER PTY LTD  
25 October 2023



For further information,  
please refer to our website

 [fairbrother.com.au](https://fairbrother.com.au)