



MODERN SLAVERY STATEMENT

ABOUT THIS STATEMENT

This statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) by the reporting entity BGIS Pty Ltd (ABN: 83 064 638 197) and its subsidiaries (collectively “BGIS”) for the year ended 31 December 2025.

AUSTRALIA

- BGIS Technical Services Pty Limited – ABN: 22 616 071 295
- HFM Asset Management Pty Ltd – ABN: 71 105 493 221
- AREA3 Pty Ltd – ABN: 91 135 428 545
- JPC Air Conditioning Pty Ltd (t/a ASM Chilltech) – ABN: 31 133 732 519
- Australian Essential Services Maintenance Pty Ltd – ABN: 72 104 358 474
- Hix Group Pty Ltd – ABN: 52 090 733 332
- Fire Services Queensland Pty Ltd – ABN: 64 158 289 966

NEW ZEALAND

- Service Resources Limited (NZ) – NZBN: 929034923542
- DHMC Trade Limited – NZBN: 9429048810425
- Dunedin Housing Maintenance Contractors Limited – NZBN: 9429036082698

BGIS holds a 49% interest in Bennelong Energy Services Pty Ltd. This entity is not a controlled entity of BGIS and therefore is not covered by this statement.

This statement was approved by the board of BGIS Pty Ltd on 6 August 2026.

MODERN SLAVERY

Modern slavery is a serious violation of fundamental human rights and human dignity. It encompasses a range of exploitative practices, including human trafficking, slavery, servitude, forced labour, debt bondage and forced marriage. These practices are recognised as significant criminal offences under Australian law and have no place in responsible business operations or supply chains.

The Modern Slavery Act 2018 (Cth) came into effect on 1 January 2019 and requires reporting entities to assess and address the risks of modern slavery within their operations and supply chains. The Act also requires organisations to disclose the actions taken to identify, prevent, mitigate and remediate modern slavery risks, and to evaluate the effectiveness of those actions.

BGIS Pty Ltd is committed to conducting business ethically, responsibly and with respect for human rights. In accordance with the requirements of the Act, BGIS is pleased to present this Modern Slavery Statement, outlining the steps taken during the reporting period to identify, assess and address modern slavery risks across our operations and supply chain.

MESSAGE FROM THE MANAGING DIRECTOR

Modern slavery continues to be a significant global challenge and a matter of serious concern for BGIS. We are committed to conducting our business ethically and responsibly, with respect for the fundamental human rights of our employees, clients, suppliers, contractors, and the communities in which we operate. This commitment is reflected in our values, governance framework, and the standards we expect throughout our operations and supply chains.



I am pleased to present BGIS's 2025 Modern Slavery Statement for Australia and New Zealand, prepared in accordance with the reporting requirements of the Modern Slavery Act 2018 (Cth). As an organisation operating across diverse markets and engaging an extensive network of suppliers and subcontractors, we recognise that modern slavery risks can exist within complex supply chains. We therefore remain focused on identifying, assessing, and addressing these risks through robust due diligence, supplier engagement, and ongoing monitoring activities.

While BGIS has not identified any instances of modern slavery within its operations or supply chains during the reporting period, we acknowledge that the risk remains present across the industries and regions in which we operate. Accordingly, we continue to strengthen our governance processes, enhance supply chain transparency, and improve our capability to identify and mitigate potential modern slavery risks before they occur.

We recognise that effectively addressing modern slavery requires continuous improvement, collaboration, and vigilance. BGIS remains committed to evolving our policies, procedures, and risk management practices to support ethical business conduct and responsible procurement. Through these efforts, we seek not only to meet our regulatory obligations but also to contribute to the protection of human rights and the prevention of modern slavery in all its forms.

A handwritten signature in dark ink, appearing to read 'Dana', followed by a long horizontal line.

Dana Nelson
President and Managing Director – APAC

ABOUT US

BGIS is a leading provider of facility management services, project delivery services, energy and sustainability solutions, asset management, critical environments, real estate services and integrated trades services. Our talented team of over 2,500 people operates across Australia and New Zealand.

Our clients are from a diverse range of sectors, including defence, justice, government, education, healthcare, utilities, finance, telecommunications, property, resources, transportation, aged care, oil & gas and sport & leisure. We manage over 34,000 client locations, totalling more than 17 million square metres in a portfolio of corporate offices, retail, universities, schools, hospitals, housing, venues & stadiums, institutions, warehouses, industrial assets and data centres.



OUR SUPPLY CHAIN

Australian and New Zealand suppliers constitute 99% of the 2025 active BGIS Pty Ltd supply chain (and over 99.9% of the spend), with the remaining vendors located internationally. The Australian supply chain constitutes 93% of the total value of all purchases made by BGIS Pty Ltd.



CATEGORY CHARACTERISTICS

Facilities Management Services

This group of suppliers represents around half of the BGIS supply chain, both in spend and supplier volume.

Services provided by these vendors primarily include labour based services of: cleaning, security services, grounds maintenance, air conditioning maintenance, electrical maintenance, hydraulic maintenance and fire systems maintenance.

Industrial Consumables, Plant Hire & Equipment

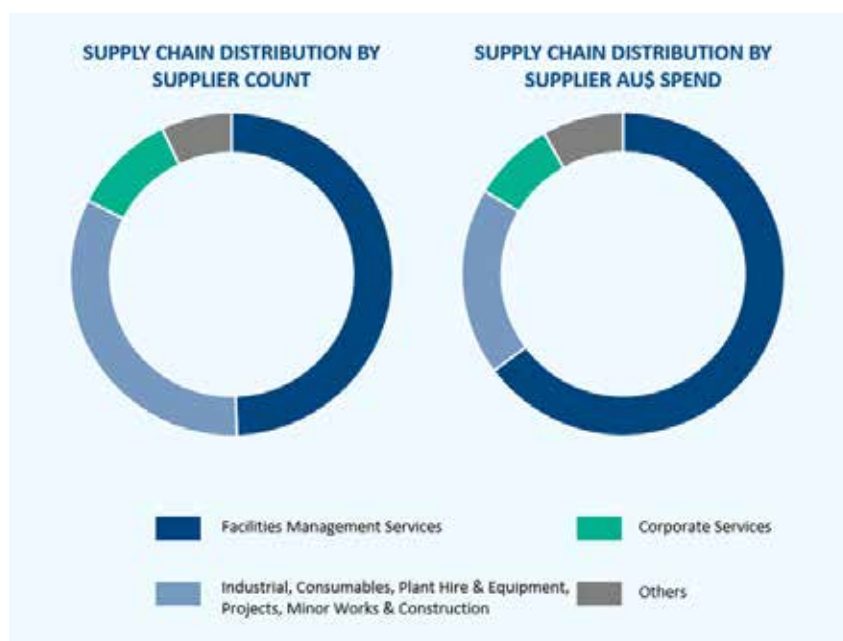
This category includes: industrial consumables and tools of trade, uniforms, PPE & safety equipment, catering / kitchen & laundry equipment, furniture and temporary plant hire.

Projects, Minor Works & Construction

Minor works and construction activities include: demolition and construction, building fabric and carpentry, civil works, electrical systems, flooring supply and installation, roofing & guttering and professional project management services.

Corporate Services

This area of our operations includes key corporate items including: travel & accommodation, IT software and equipment, telephony, stationery and professional services such as finance, legal and other consultants.



MODERN SLAVERY RISKS

While BGIS operates primarily in Australia, a relatively low-risk environment for modern slavery, risks may exist within labour-intensive and international supply chains.

In 2025, BGIS assessed its supply chain using a risk-based supplier tiering model that considered:

- Country risk (Global Slavery Index)
- Industry and category risk
- Supplier volume and spend

Suppliers were assigned a Low, Medium, or High-risk rating, which determined the level of due diligence, audit, and compliance activities required.

Country risk assessments were based on the Walk Free Global Slavery Index, using a weighted methodology that considered the prevalence of modern slavery, population vulnerability, and government response. These ratings were then applied across the BGIS supplier base to identify and prioritise modern slavery risks.

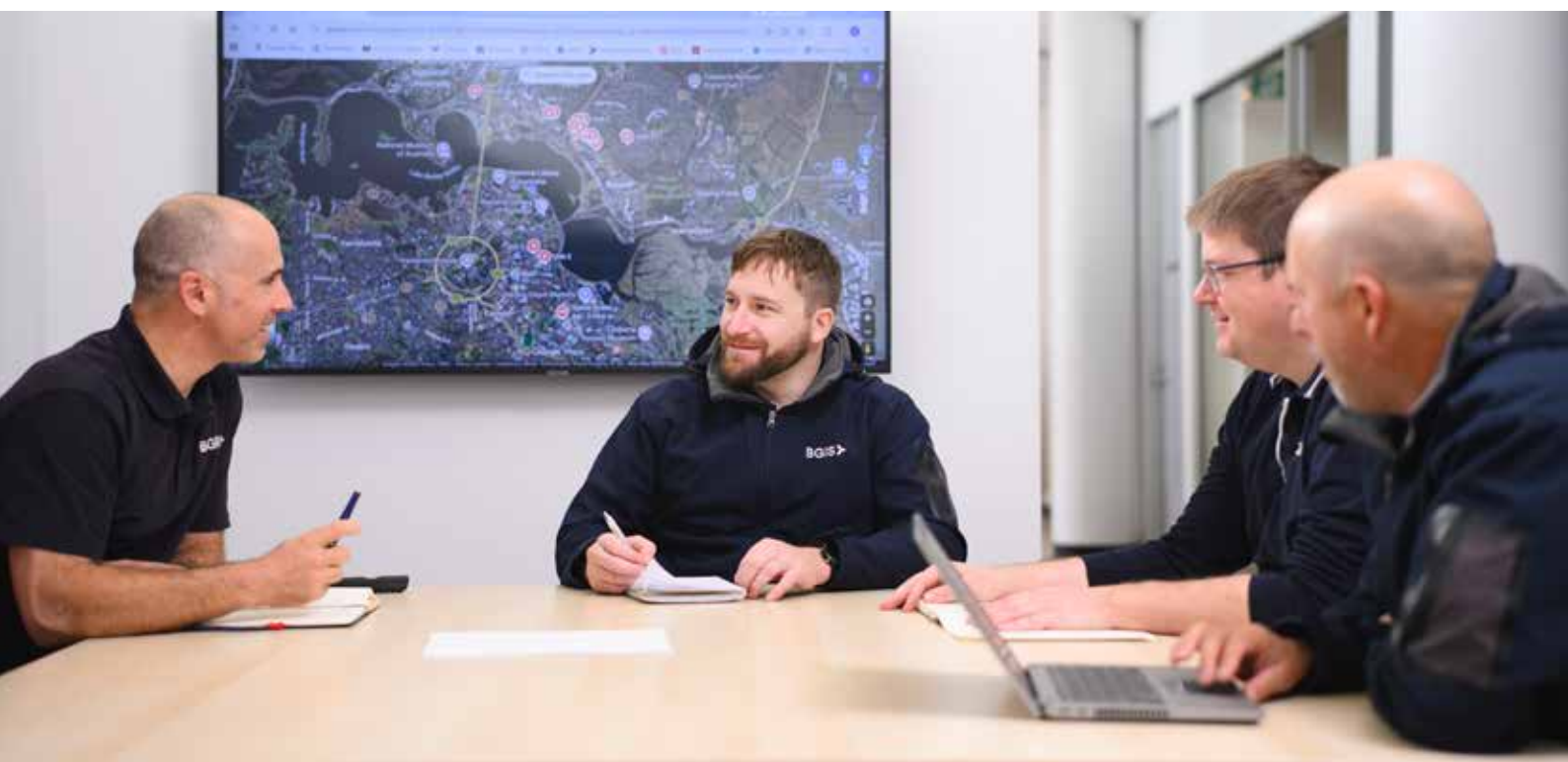
* <https://www.walkfree.org/global-slavery-index/downloads/>

Industry Risk Assessment

BGIS maintains a procurement taxonomy that categorises suppliers by industry and assesses modern slavery risk using a Low, Medium, or High risk rating.

Industry risk ratings consider factors such as workforce intensity, wage vulnerability, reliance on outsourced or overseas supply chains, and exposure to known high-risk sectors including textiles, electronics, manufacturing, food production, and cleaning services.

These risk ratings are applied across the BGIS supplier base to identify and prioritise suppliers requiring enhanced due diligence and monitoring.



OUR ACTIONS

Policy, Procedure and Governance

BGIS's approach to managing modern slavery risk is supported by a comprehensive governance framework, including policies, procedures, training, and supplier management practices.

Code of Business Conduct and Ethics

All employees are required to comply with the BGIS Code of Business Conduct and Ethics and complete annual training and certification to reinforce ethical business practices.

Modern Slavery Framework

BGIS maintains a Modern Slavery Framework that outlines our approach to identifying, assessing, and mitigating modern slavery risks across our operations and supply chains. The framework supports compliance with legislative obligations and drives continuous improvement through defined responsibilities, training, and performance measures.

Sustainable Procurement

BGIS incorporates the principles of ISO 20400 Sustainable Procurement into its procurement practices, ensuring that environmental, social, ethical, and human rights considerations are embedded in purchasing decisions.

Training and Awareness

BGIS delivers modern slavery awareness training to employees involved in procurement and supplier management activities, helping to strengthen understanding of modern slavery risks and reporting obligations.

Procurement Policies and Supplier Governance

BGIS procurement policies promote ethical, sustainable, and responsible sourcing. Through supplier due diligence, risk assessments, and subcontracting guidelines, BGIS seeks to improve supply chain transparency and identify potential modern slavery risks throughout its supplier network.

Supplier Governance and Due Diligence

Vendor Code of Conduct

All BGIS suppliers are required to acknowledge and comply with the BGIS Vendor Code of Conduct, which sets clear expectations regarding ethical business practices, human rights, fair working conditions, and compliance with applicable labour laws. The Code expressly prohibits forced, bonded, indentured, or involuntary labour.

Subcontractor Management

Modern slavery obligations are incorporated into BGIS subcontracting agreements, enabling supplier oversight and compliance verification through audit and review rights.

Whistleblower Framework

BGIS maintains a confidential whistleblower program that allows employees and suppliers to raise ethical concerns anonymously. Reports are managed in accordance with the BGIS Whistleblower Policy and legislative requirements.

OUR ACTIONS

Supplier Due Diligence

During 2025, BGIS assessed its active supplier base of 4,126 vendors through a risk-based due diligence program, including third-party assessments, supplier declarations, and targeted audits for higher-risk suppliers.

Anti-Bribery and Corruption Controls

All new suppliers undergo independent screening to identify potential sanctions, politically exposed persons, adverse media, or other compliance risks. Existing suppliers are subject to annual re-screening to support ongoing supplier integrity and risk management.

Supplier Prequalification

Suppliers providing on-site services are required to complete BGIS prequalification requirements, including acknowledgement of the BGIS Vendor Code of Conduct and disclosure of their workforce engaged in delivering services to BGIS and its clients.

Modern Slavery Questionnaire

BGIS incorporates modern slavery due diligence into its supplier prequalification process through the Ideagen platform. For suppliers not managed through the platform, assessments are completed manually and reviewed by the BGIS Procurement team.

In 2025, 144 medium-risk suppliers were assessed through this process. Suppliers that did not meet BGIS requirements or raised concerns were escalated for further review and audit.

The questionnaire assesses supplier exposure to modern slavery risks across key areas, including:

- Business profile and country of operation
- Modern slavery policies and governance
- Training and awareness programs
- Supply chain transparency
- Risk assessment and audit practices
- Controls to prevent forced or bonded labour
- Ongoing compliance and monitoring activities

This process supports BGIS in identifying, assessing, and managing modern slavery risks within its supply chain.

Supplier Auditing

BGIS conducts targeted audits of suppliers identified as high risk through its modern slavery risk assessment process.

For service suppliers, audits focus on employment practices, including verification of legal work rights, payroll compliance, wage payments, leave entitlements, and superannuation obligations.

For goods suppliers, audits assess supply chain transparency, including product origin, labour practices, supply chain visibility, and supplier oversight of their own subcontractors and sourcing partners.

During 2025, BGIS completed 15 audits of high-risk suppliers, with no material instances of modern slavery identified.



EFFECTIVENESS OF ACTIONS

BGIS's Modern Slavery Framework is supported by ongoing governance, supplier engagement, and risk management activities designed to improve supply chain transparency and reduce modern slavery risks.

Through supplier assessments, training, and ongoing engagement, BGIS seeks to increase supplier awareness and strengthen controls to identify and mitigate modern slavery risks within their operations and supply chains.

While no material instances of modern slavery were identified through our supplier reviews and audit program, these activities provided valuable insights that have informed opportunities for continuous improvement within both the BGIS framework and supplier control environments.

These findings will continue to guide enhancements to our modern slavery risk management approach and supplier due diligence processes.

CONSULTATION

The BGIS Modern Slavery Framework is overseen by senior leaders across Procurement, Legal, People & Culture, and Operations, with reporting provided to the Executive Leadership Team.

All wholly owned BGIS subsidiaries participate in the modern slavery program, with consistent application of supplier risk assessments, due diligence activities, and audit processes across their respective supply chains.

BGIS also engages with clients and stakeholders to promote transparency regarding our approach to identifying, assessing, and managing modern slavery risks throughout our operations and supply chain.

NEXT STEPS

BGIS has continued to strengthen its approach to identifying and managing modern slavery risks across its operations and supply chain. In 2026, we will focus on:

- Enhancing supplier support and guidance throughout the risk assessment and due diligence process.
- Expanding training and awareness programs for employees involved in procurement and supplier management activities.
- Continuing our supplier audit program and sharing outcomes to improve transparency and awareness across the business.

BGIS recognises that managing modern slavery risk requires ongoing vigilance and continuous improvement. We remain committed to strengthening our governance, due diligence, and supplier engagement practices to effectively identify, assess, and mitigate modern slavery risks on behalf of our organisation and our clients.





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