

Modern Slavery Statement

Jan - Dec 2025

INFINITY

Build. Above. Beyond.

This Statement is submitted by Infinity Constructions Group (ABN 95 111 941 792) on behalf of all eligible Infinity Construction Group reporting entities, as defined in Commonwealth Modern Slavery Act 2018 (MSA)

We do this as a complying entity, a demonstration of best practice and consistent with the values we hold as a responsible, privately owned organisation.

Submitted For Approval - Approval Pending



01

ABOUT INFINITY CONSTRUCTIONS GROUP



OUR STORY

Infinity Constructions has been operating continuously since 1992. We are a Tier 2 commercial design and construction company operating in the Sydney and Melbourne markets.

We have built our reputation as a quality builder that places outstanding customer service at the heart of our business. We are motivated by delivering excellence to our clients.

We serve a wide range of customers including developers, end user clients, institutional clients and clients who develop, lease and hold the assets.

We primarily operate in \$10m-\$200m sized projects in Commercial, Industrial, Accommodation ie. PBSA, Hotels, Aged Care & Seniors Living, Hospitality and Community.

Our Project Delivery systems include Design & Construct often with novated consultants, Cost Plus and Lump Sum construction contracts.

Our continued growth over the last 34 years is primarily due to our loyal client base who trust us to deliver their innovative and award-winning projects.

We are the contractor of choice for a number of leading architects, developers and clients.

This Modern Slavery Statement is made by Infinity Constructions Group Pty Ltd (ABN 95 111 941 792) for the reporting period 1 January 2025 to 31 December 2025, pursuant to the Modern Slavery Act 2018 (Cth).

This Statement is submitted by Infinity Constructions Group Pty Ltd as the reporting entity. It also covers Infinity Constructions Group Melbourne Pty Ltd (ABN 58 610 586 126) as an entity within the Infinity group structure. Infinity Constructions Group Melbourne Pty Ltd is included on a voluntary basis unless it independently meets the reporting threshold for the reporting period. The entities covered by this Statement are collectively referred to as "Infinity", "we", "our" or "us".

This Statement describes the steps taken by Infinity Constructions during the reporting period to identify, assess and address modern slavery risks in our operations and supply chains, including our due diligence, remediation approach, effectiveness assessment and consultation process.

OUR MISSION

To maintain trustworthiness by working with all our stakeholders to deliver our projects with excellence, cooperation and collaboration, cost effectiveness, on time, with the desired quality and the highest level of workplace health and safety.



OUR VISION

To be recognised by our Clients, Consultants, Subcontractors, Suppliers, the Community and Employees as a Trustworthy Business Partner.

OUR VALUES



Our core values are the building blocks to the success of Infinity, guiding our name to be synonymous with quality projects and construction. These values define Infinity and how we conduct our business. Since our inception, Infinity has earned its reputation in both the industry and wider community.



SAFETY

Safety is everyone's responsibility and will always take priority over all other considerations. Safety is at the heart of everything that we do.



SUSTAINABILITY

Our business must always remain sustainable. Sustainability is achieved when all our processes come together to deliver efficiency and value.



ACCOUNTABILITY

We are accountable for the buildings we build, the way we operate and the outcome of our actions. Our buildings are there for the long-term and we respect our clients and those who occupy the buildings.



TRUSTWORTHINESS

Trust in us and from us is the fundamental ethos of Infinity's culture. In everything we do, we gain, maintain and foster trust. Trust comes from us delivering what we promised.

02

OUR STRUCTURE, OPERATION & SUPPLY CHAIN

OUR STRUCTURE

Infinity Constructions Group consists of two trading companies Infinity Constructions Group (ABN: 95 111 941 792) and Infinity Constructions Group Melbourne (ABN: 58 610 586 126)

Infinity Constructions Group Pty Ltd is a privately held company committed to driving positive change in the Australian Construction Industry (predominately in NSW). It is owned by Directors all whom are actively involved in the day to day management and operation of business.

Each Infinity company division operates under it's own ABN and is governed by the same management system that oversee Infinity Construction Group operates.

OUR OPERATIONS

1. Infinity Constructions Group is headed by a Managing Director and Senior Leadership Team (who includes a Group General Manager) who exercise various levels of autonomy within the disciplines of Infinity's Integrated Management System (IMS), including the HSEQ & ESG frameworks.
2. This level of managerial flexibility enables teams to respond promptly to changing market conditions, yet remain accountable to our risk management and governance process requirements of client, regulator and company.
3. Infinity is certified to International Management System Standards for Quality (ISO9001:2015), Environmental (ISO14001:2015) and Health & Safety (ISO45001:2018). Infinity Constructions Group is also accredited by the Office of the Federal Safety Commissioner.



OUR OPERATIONS



600+

Projects Built



2

Office Locations (NSW & VIC)



140+

Infinity Staff



4.5-Star Gold iCIRT Rating



8,900

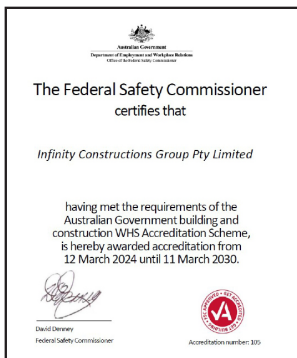
Australian Suppliers



0

China Suppliers

OUR ACCREDITATIONS



OUR SUPPLY CHAIN

Infinity Constructions maintains a skilled and multidisciplinary workforce across its construction operations and corporate support functions. Our people fulfil a broad range of roles, including bid management, estimating, design management, construction management, project management, contract administration, project engineering, site management, site supervision, safety management and construction delivery. These operational roles are supported by corporate functions including finance, legal, quality, health and safety, environmental management, sustainability, risk and compliance, information technology, procurement and administration.

As Infinity's business is principally concerned with the design, procurement and delivery of construction projects, we engage a broad network of subcontractors, suppliers, consultants and other service providers, collectively referred to in this Statement as "supply partners". These supply partners support the delivery of physical works, professional services, materials, equipment and site-based services required across our projects.

The majority of Infinity's construction delivery activity occurs on project sites, where a significant proportion of work is performed by subcontractors and other supply chain participants. This reflects the typical construction delivery model, where principal contractors rely heavily on specialist trade subcontractors to deliver discrete packages of work.

Infinity also recognises that its full supply chain extends beyond work undertaken directly on construction sites. It includes the off-site manufacture, fabrication and assembly of construction materials, products and systems, as well as upstream sourcing of raw materials. Some materials and products may originate from, or be manufactured in, overseas jurisdictions, including jurisdictions where labour rights protections, regulatory oversight and supply chain transparency may vary.

SUPPLY CHAIN BREAKDOWN

Infinity's immediate and direct supply chain for construction project delivery can be broadly considered in two streams:

1. Delivery of Trade Works (Subcontracted Packages)
2. Direct Procurement of Goods and Services



OUR SUPPLY CHAIN

1. DELIVERY OF TRADE WORKS (SUBCONTRACTED PACKAGES)

Subcontracted Trade Works represent the largest component of Infinity's construction supply chain. These works are generally undertaken by specialist trade subcontractors engaged to deliver defined packages of construction work.

Subcontractors are commonly engaged on a "supply and install" basis, meaning they are responsible for both:

- Supplying materials, goods, components or systems; and
- Providing the labour required to install, construct or integrate those materials or systems on site.

Subcontract Works may also include off-site prefabrication or manufacturing, such as factory fabrication of structural steel, façade systems, joinery, services modules, glazing systems or other specialist construction components. In these circumstances, labour may be used both on site and off site, including within factory or manufacturing environments.

The relative labour and material components vary depending on the trade package. For some packages, such as finishes, services, structure and façade, both labour and material inputs can be significant. For other packages, the labour component may be more dominant.



OUR SUPPLY CHAIN

Table 1: Subcontracted Construction Delivery – Typical Trade Packages

TRADE CATEGORY	DESCRIPTION OF WORKS (INFINITY CONSTRUCTIONS)
Civil and Enabling Works	Civil works including excavation, bulk earthworks, piling, shoring, ground retention systems, roadworks and associated raw materials.
Foundations and Substructure	Foundation systems incorporating piling, ground improvement, reinforced concrete footings and associated structural elements.
Structural Concrete	Formwork, steel reinforcement, in-situ concrete works and precast concrete supply and installation.
Masonry	Brickwork, blockwork and associated masonry systems.
Structural Steel and Metalwork	Structural steel, prefabricated steel components and architectural metalwork, including fabrication and installation.
Roofing Systems	Roofing works including metal roof sheeting, waterproofing and insulation systems.
Façade Cladding Systems	External wall systems including light steel framing, aluminium and composite panelling, fibre cement, and architectural façade elements such as louvres.
Façade Glazing Systems	Aluminium framing, glazing systems, curtain walling and associated façade glazing components.
Internal Partitions and Ceilings	Internal wall systems including steel or timber framing, plasterboard linings, ceiling systems, acoustic panels and associated finishes.
Floor and Wall Finishes	Interior finishes including tiling, carpet, vinyl flooring, painting and wall coverings.
Doors and Frames	Supply and installation of timber doors, metal door frames and associated systems.
Joinery and Carpentry	Custom joinery, cabinetry, fixtures, fittings and general carpentry works including workstations and fit-out elements.
Building Services	Mechanical, electrical, hydraulic, fire, security, communications, lifts and specialist systems, including all associated components, wiring, pipework, fixtures, fittings and equipment.



OUR SUPPLY CHAIN

Goods and Services Supply

Goods and Services Supply refers to materials, equipment, plant, consultancy services and other services procured directly by Infinity on a "supply only" or standalone service basis.

This may include:

- Direct supply of construction materials for incorporation into the works;
- Plant, equipment and temporary works hire;
- Professional consultancy services, including design, engineering, certification and specialist advice;
- Site services such as waste management, security, cleaning, logistics and amenities.

Although Goods and Services Supply may represent a smaller proportion of project procurement compared with Subcontract Works, it remains an important part of Infinity's modern slavery risk profile due to the potential involvement of offshore manufacturing, raw material sourcing, labour hire, lower-skilled labour, logistics and multi-tiered supply arrangements.

Table 2: Direct Procurement of Materials, Plant and Services (Supply Only)

CATEGORY	DESCRIPTION (INFINITY CONSTRUCTIONS)	SUPPLY CHAIN CONSIDERATIONS
Structural Materials Supply	Direct procurement of reinforcement steel, concrete and associated construction materials for incorporation into works.	May involve upstream manufacturing, raw material extraction and transport logistics.
Furniture, Fixtures and Equipment (FF&E)	Supply of furniture, built-in and loose fixtures, appliances and operational equipment.	Often involves multi-tier manufacturing and offshore supply chains.
Doors and Hardware	Supply of door hardware, specialist locking systems, access systems and associated fittings.	Manufactured goods with potential offshore production exposure.
Plant and Equipment Hire	Hire of construction plant, including cranes, hoists, small plant, temporary works equipment, site fencing and site accommodation.	Includes equipment manufacture, maintenance labour and logistics networks.
Environmental Services	Waste management services including removal, transport and recycling of construction and demolition materials.	Involves transport, processing facilities and subcontracted labour.
Professional and Consultant Services	Design, engineering, certification and specialist advisory services supporting project delivery.	Predominantly professional workforce with generally lower inherent modern slavery risk.
Authority and Statutory Services	Services provided by government and regulatory authorities, including permits, approvals, inspections and utility connections.	Low inherent risk due to regulated nature of service provision.

OUR SUPPLY CHAIN

Additional Goods and Services Procurement

In addition to project-related procurement, Infinity Constructions also procures a range of goods and services to support the day-to-day operation of its business.

These include:

CATEGORY	DESCRIPTION (INFINITY CONSTRUCTIONS)
Information Technology (IT)	Procurement of technology hardware and services, including computers, software platforms, cloud services, document management systems, printers, audio-visual equipment and mobile devices.
Corporate and Office Services	Office-related services required to support business operations, including leasing arrangements, facilities management, utilities, cleaning and security services.
Hospitality and Catering	Catering and hospitality services procured for meetings, corporate events and project-related functions.
Professional Services (Non-Project)	External advisory and professional services, including legal, taxation, insurance, banking and financial services, consulting, and training programs (including professional development and workforce wellbeing initiatives).
Site and Office Consumables	General consumables for project sites and offices, including stationery, amenities and kitchen supplies.
Safety Equipment and Workwear	Personal protective equipment (PPE) and workwear, including boots, hard hats, safety glasses, gloves, hearing protection and high-visibility clothing.
Branded Materials and Merchandise	Branded clothing, promotional items and materials used for corporate or project-related activities.

Geographic Footprint of Supply Chain

Infinity Constructions sources the majority of its goods and services through Australian-based subcontractors, suppliers and service providers.

Infinity does not maintain operations in jurisdictions identified as having the highest prevalence of modern slavery¹. Based on supplier engagement activities to date, Infinity is not aware of any direct Tier 1 supply partners with operations in those highest-risk jurisdictions.

However, Infinity acknowledges that:

- A small number of supply partners may have indirect exposure to higher-risk jurisdictions; and
- Certain goods and materials procured through Australian distributors or subcontractors may be manufactured or sourced internationally, including from regions with elevated modern slavery risk profiles.

These exposures are most commonly associated with:

- Imported construction materials and manufactured products, including steel, aluminium and façade systems
- Stone products and finishing materials
- Electrical and mechanical components and equipment
- Emerging technologies, such as solar panel systems

Infinity also recognises that products imported from Europe, including specialised equipment and building components, may form part of its extended supply chain.

¹ Global Slavery Index 2023 (Walk Free). Top 10 Countries – Highest Prevalence of Modern Slavery: 1. North Korea, 2. Eritrea, 3. Mauritania, 4. Saudi Arabia, 5. Türkiye (Turkey), 6. Tajikistan, 7. United Arab Emirates, 8. Russia, 9. Afghanistan, 10. Kuwait

OUR SUPPLY CHAIN

2. DIRECT PROCUREMENT OF GOODS & SERVICES

Of Infinity's FY25 total procurement spend of \$180m, approximately 4% was spent by groups head office as corporate expenses and 96% project delivery based.

For the purpose of this report, Infinity Constructions has assessed the modern slavery risks associated with both corporate and projects using the same risk-based approach.

During FY25, Infinity Constructions engaged the services of approximately 800 suppliers and service providers accounting for just in excess of \$180m in total spend.

Our current direct suppliers (tier 1) vendor management system retains in excess of 8,900 Vendors of which 1600 have been used at least once in the past 3 years.



Given the complexities of our construction business and project types, we have a concentration of longer term, higher value spend construction contracts with suppliers and service providers who have worked with Infinity for over a decade

In FY25 our top 200 suppliers accounted for 92% of our total spend, compared to 80% and 85% prior years.

This year our top 200 suppliers account for 97% of our total spend.

The concentration and consistency of our suppliers is assisting us with improving our visibility of our supply chain.

In order for a Supplier to be engaged on one of our projects they must submit a completed "Subcontractor/Supplier Questionnaire". This questionnaire is assessed and vetted by our procurement teams to ensure that the Supplier has the relevant processes in place to ensure that they are able to comply with our processes. As part of this assessment and vetting process our Suppliers are required to set out their policies and approach to managing modern slavery.

Our Suppliers are expected to have their own Code of Conduct in line with Infinity's Code of Conduct.

In addition, all prospective Suppliers attend a "Tender Interview Questionnaire" meeting where they are asked to confirm their commitment to their modern slavery policy. For those Suppliers who engage sub-suppliers, including those that are based internationally, we request compliance statements with the Modern Slavery Act.

As a minimum they must confirm strict compliance with all local and national employment laws and regulations including the payment of the minimum wage and comply with all relevant bribery, corruption and secret commissions laws.

In addition, they must confirm strict compliance with occupational Health and Safety and Environmental laws. The performance of our Suppliers is assessed at the completion of their works and entered into a data base for subsequent procurement teams to review.

Our Sub-contracts stipulate compliance with Modern Slavery Act as another layer of legal obligation for our suppliers.

We are committed to the highest ethical behaviour attainable and will continue to train and communicate with our employees, suppliers and the greater supply chain to reduce wherever possible any incident of modern slavery.

03

IDENTIFYING RISKS OF MODERN SLAVERY IN OUR OPERATIONS

RISKS IN OUR OPERATIONS



Infinity Constructions assesses modern slavery risk by considering whether our business may cause, contribute to, or be directly linked to modern slavery practices through our operations, products, services or business relationships. We consider workforce vulnerability, sector risk, product risk, geographic risk, business model risk and visibility beyond Tier 1 suppliers.

RISKS IN OUR OPERATIONS

We assess the risk of modern slavery in our direct operations as low to medium, noting that our employees are engaged in Australia, our workforce is predominantly permanent, HR processes include right-to-work checks, and payroll and employment arrangements are managed through internal HR and finance controls. However, we recognise that construction project environments can involve vulnerable workers through subcontractor workforces and site-based labour arrangements.

RISK AREA	ASSESSMENT	INDICATIVE RISK LEVEL
Direct employees	Employees are primarily Australian-based and engaged under formal employment arrangements. HR onboarding includes right-to-work checks and policy induction.	Low
Casual, temporary or visa-dependent workers	Infinity has previously reported limited use of casual contractors and fewer than 3% employees on temporary visas. Verify current data for this reporting period.	Low
Site-based subcontractor workforces	Workers may be employed by subcontractors or lower-tier subcontractors. Visibility can reduce where labour is deployed through complex subcontracting chains.	Medium
Cleaning, security, traffic control and labour hire	These services can involve lower-paid, migrant, casual or shift-based workforces and may present heightened vulnerability	Medium
Corporate services	Professional services are generally lower risk; however cleaning, security, uniforms, IT hardware and transport may carry elevated product or labour risks.	Low - Medium

RISKS IN OUR SUPPLY CHAIN

Materials and construction services, including labour hire the main areas of higher risk in our business.

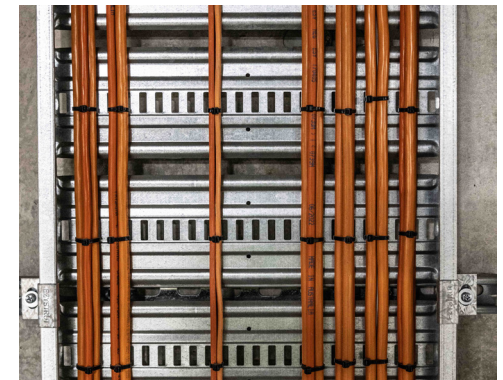
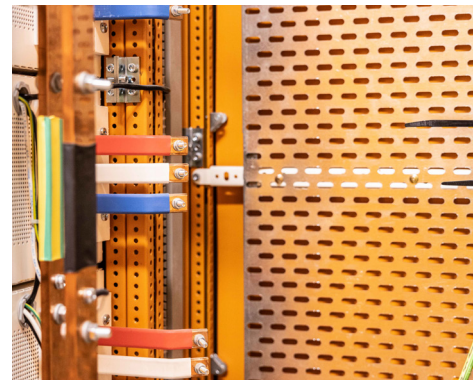
Infinity considers that its higher modern slavery risks are more likely to arise in supply chains rather than direct employment. Relevant construction sector risk factors include outsourcing, multiple subcontracting layers, labour hire, tight project timeframes and commercial pressures, limited visibility beyond Tier 1 suppliers, and the international sourcing of some raw materials and manufactured products.

Higher-risk supplier and product categories for Infinity include:

- labour hire, cleaning, security, traffic control and site services;
- subcontracted trades with lower barriers to entry or multiple labour layers;
- facade systems, glass, aluminium, cladding and manufactured façade components;
- structural steel, reinforcement steel and fabricated metal products;
- timber, plywood, engineered wood and joinery components;
- stone, tiles, ceramics and sanitaryware;

- PPE, uniforms and textiles;
- solar panels, electrical components, batteries and electronic equipment;
- transport, freight, shipping and logistics; and
- products or components manufactured in jurisdictions with weaker labour protections, higher forced labour prevalence, or limited supply chain transparency.

Infinity acknowledges that it may be directly linked to modern slavery through the conduct of suppliers or lower-tier supply chains, even where Infinity does not directly cause or contribute to the harm. This is particularly relevant where products are specified by clients or consultants, procured by subcontractors as part of labour-and-material packages, or sourced through distributors with limited upstream transparency.



04

ACTIONS WE HAVE TAKEN TO ADDRESS MODERN SLAVERY

ACTIONS WE HAVE TAKEN TO ADDRESS MODERN SLAVERY

During the reporting period, Infinity maintained and continued to develop a risk-based approach to managing modern slavery risks. Our actions include governance, policies, supplier due diligence, contractual controls, training, site awareness, reporting channels and supplier engagement.

GOVERNANCE AND ACCOUNTABILITY

Modern slavery risk is managed through Infinity's governance structure, including oversight by the Managing Director, senior leadership team and relevant business functions including procurement, commercial, HR, WHSEQ, systems, finance and project delivery. Modern slavery risk is incorporated into Infinity's broader business risk and compliance framework. Infinity has established a Modern Slavery Working Group with representatives from Procurement/Commercial, WHSEQ, HR, Finance, Systems/Compliance and Operations. The Working Group will meet at least quarterly and report to the senior leadership team and Board.

POLICIES AND STANDARDS

Infinity's modern slavery risk management approach is supported by the following policies and documents:

- Modern Slavery Policy;
- Code of Conduct Policy and Employee Code of Conduct;
- Whistleblower Policy;
- Equal Employment Opportunity Policy;
- Work Health, Safety and Welfare Policy;
- Workplace Bullying, Harassment and Discrimination Policy;
- Environmental Policy Statement;
- Statement of Support for Indigenous Participation;
- Subcontractor and consultancy agreements; and
- Integrated Management System procedures and procurement controls.

These policies communicate Infinity's expectation that employees, subcontractors and suppliers act ethically, comply with applicable employment and workplace laws, respect human rights and report concerns about unethical or unlawful conduct.

SUPPLIER DUE DILIGENCE AND PROCUREMENT CONTROLS

Infinity's supplier onboarding and procurement controls require prospective subcontractors and suppliers to provide information relevant to their capability, compliance, safety, quality,

environmental management, insurances, industrial relations, financial standing and modern slavery risk management.

Infinity's supplier due diligence includes, where relevant:

- supplier/subcontractor questionnaires that request information about modern slavery policies, risk controls and supply chain practices;
- pre-tender or post-tender interview questions relating to compliance, labour arrangements, right-to-work checks, subcontracting and modern slavery;
- requirements for suppliers to acknowledge modern slavery obligations and agree not to use modern slavery in their operations or supply chains;
- requirements for suppliers to notify Infinity if they become aware of modern slavery risks or incidents;
- contractual clauses requiring compliance with applicable laws, employment obligations, work health and safety obligations, anti-bribery and corruption obligations, and modern slavery requirements;
- supplier performance assessments at completion of works; and
- maintenance of supplier information in Infinity's vendor management system for future procurement decisions.

TRAINING AND AWARENESS

Infinity provides modern slavery awareness through employee induction, online training and site induction processes. Modern slavery content is included in company-level site inductions for subcontractors attending Infinity construction sites. Infinity has also used site signage, including multilingual signage, to increase awareness of what modern slavery may look like and how to report concerns.

WORKER VOICE, GRIEVANCE AND REMEDIATION

Infinity encourages employees, subcontractors, suppliers and workers to raise concerns through line management, project teams, HR, WHSEQ and the Whistleblower Policy. Infinity's Whistleblower Policy is intended to support protected disclosures and prevent detriment to eligible whistleblowers.

Infinity provides a direct Whistleblower email address as well as anonymous online reporting portal available via a web link / QR code available across all workplaces and construction sites.

ACTIONS WE HAVE TAKEN TO ADDRESS MODERN SLAVERY

If Infinity identifies or suspects a modern slavery incident, Infinity will prioritise the safety, welfare and interests of affected persons. Infinity will not take action that may place an affected person at further risk. Infinity will seek specialist advice where appropriate and may engage with relevant authorities, clients, suppliers, unions, civil society organisations or support services depending on the circumstances.

Infinity's remediation approach includes:

1. triage and immediate safety assessment;
2. escalation to the nominated executive owner / Modern Slavery Working Group;
3. confidential fact-finding and preservation of evidence;
4. engagement with specialist support and authorities where required;
5. supplier corrective action plan, suspension or termination where appropriate;
6. protection of affected workers from retaliation;
7. review of root causes and control failures; and
8. review of procurement controls, contract clauses, training and monitoring to prevent recurrence.

COLLABORATION AND INDUSTRY ENGAGEMENT

Infinity recognises that modern slavery cannot be addressed by one organisation alone. During the reporting period, Infinity engaged with suppliers and project stakeholders through procurement, tendering, project delivery and site induction processes. Infinity will continue to explore collaboration with industry peers, clients, consultants and suppliers where a shared approach can improve supply chain transparency and risk mitigation.



05

ASSESSING EFFECTIVENESS OF OUR ACTIONS

MEASURING EFFECTIVENESS

CY25 PROGRESS

Infinity assesses the effectiveness of its modern slavery actions through a combination of governance review, supplier due diligence outcomes, training completion, procurement controls, incident reporting, site awareness and management review. We recognise that effectiveness assessment should move beyond describing activities and should include measurable indicators, trends and lessons learned.

EFFECTIVENESS INDICATOR	HOW INFINITY WILL ASSESS IT	MEASUREMENT / TARGET
Governance	Modern Slavery Working Group meetings held and actions closed.	Quarterly meetings; action register maintained.
Policies and Standards	Regularity of reviews of policies in line with system requirements.	Annual review
	Retraining of existing employees and workers into amended documents	100% completion of retraining
Training	Employee and relevant subcontractor/site induction completion rates.	98% employee completion in CY2025; modern slavery included in 100% site inductions.
Contract controls	Modern slavery clauses included in standard subcontract and consultancy agreements.	Standard clauses reviewed annually and used in new engagements.
Supplier engagement	Number of suppliers issued questionnaire, responses received, follow-ups completed and corrective actions closed.	Report quantitative outcomes in next statement.
Worker voice	Reports received through grievance/whistleblower/project channels and response timeframes.	0 Reports received CY2025.
	Number of concerns, themes and closure status protecting confidentiality	
Remediation readiness	Incident response procedure tested or reviewed.	Procedure approved; tabletop scenario completed CY2025
Continuous improvement	Actions from previous statement and AGD feedback addressed.	Specific consultation disclosure included and approved.

MEASURING EFFECTIVENESS

ACTIONS FOR NEXT REPORTING PERIOD CY2026

PRIORITY	RECOMMENDED ACTION	PURPOSE / EXPECTED OUTCOME	OWNER/S
High	Formalise a Modern Slavery Working Group and Terms of Reference.	Creates accountable governance and evidence of consultation and oversight.	MD / Systems / Procurement
High	Implement a supplier modern slavery risk-tiering methodology.	Focuses due diligence on highest-risk categories, spend and labour/ product risks.	Procurement / Commercial
High	Update supplier questionnaire for high-risk suppliers.	Improves evidence collection on labour rights, subcontracting, materials origin and worker protections.	Procurement / Systems
High	Develop a Modern Slavery Incident Response and Remediation Procedure.	Provides a clear, victim-centered process if indicators or incidents are identified.	Systems / HR / Legal
Medium	Map top 50 suppliers by spend and category risk.	Builds on the existing spend concentration data and improves Tier 1 visibility.	Finance / Procurement
Medium	Track measurable KPIs in the Quarterly Business Report.	Demonstrates effectiveness rather than activity only.	Systems / SLT
Medium	Refresh employee and site induction training with role-specific content for procurement, commercial and project teams.	Improves practical capability to identify red flags and escalate concerns. Track training completion rates for employees and workers.	HR / WHSEQ / Systems

06

CONSULTATION PROCESS WITH OWNED OR CONTROLLED ENTITIES

CONSULTATION PROCESS WITH OWNED OR CONTROLLED ENTITIES

Infinity Constructions Group Pty Ltd consulted with Infinity Constructions Group Melbourne Pty Ltd and relevant business functions across the Infinity group in preparing this Statement. The consultation process was designed to ensure that the entities and functions covered by this Statement understood Infinity's modern slavery risks, contributed relevant information, and were aware of the actions and commitments described in this Statement.

The consultation process included:

1. identifying the entities covered by the Statement and confirming the reporting and voluntary reporting status of each entity;
2. reviewing the Attorney-General's Department feedback on Infinity's previous statement and confirming the need to strengthen the consultation disclosure for owned or controlled entities;
3. requesting and collating input from relevant functions, including senior management, procurement/commercial, HR, WHSEQ, finance, systems/compliance and project delivery representatives;
4. reviewing supply chain categories, procurement spend, supplier onboarding processes, modern slavery questionnaire content, subcontract clauses, training processes, site induction content and whistleblower/reporting arrangements;
5. consulting with representatives responsible for New South Wales and Victorian operations to confirm whether modern slavery risks and controls were materially different across jurisdictions;
6. reviewing the draft Statement with relevant senior leaders and entity representatives to confirm accuracy, completeness and consistency;
7. escalating the draft Statement to the Managing Director, senior leadership team and Board for review and approval; and
8. communicating finalised obligations and improvement actions to relevant business functions and entities after approval.

The consultation process confirmed that Infinity's entities operate under a common governance framework and management system, with shared policies, procedures, procurement controls, training expectations and reporting channels. Where differences exist at project or jurisdiction level, these are managed through project-specific procurement, WHSEQ and commercial processes.



07

GOVERNANCE & AUTHORITY

GOVERNANCE & AUTHORITY

The key policies and documents that guide and govern our Modern Slavery, ESG and other social initiatives are listed below.

Infinity Continually reviews these policies, codes and documents to ensure they meet ours and our clients' expectations and all regulatory requirements.

Modern Slavery Policy	Whistleblower Policy
Code of Conduct Policy	Health & Safety Policy Statement
Equal Employment Opportunity Policy (EEO)	Environmental Policy Statement
Statement of Support for Indigenous Participation	Workplace Bullying, Harassment and Discrimination Policy
Subcontractor and Consultancy agreements	

This statement was approved by the undersigned on 22 May 2026 and has the full support of the Infinity Constructions Board and leadership team.



Alan Yazbek
Managing Director



Jason Chung
Chief Financial Officer



OUR CONTACTS

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