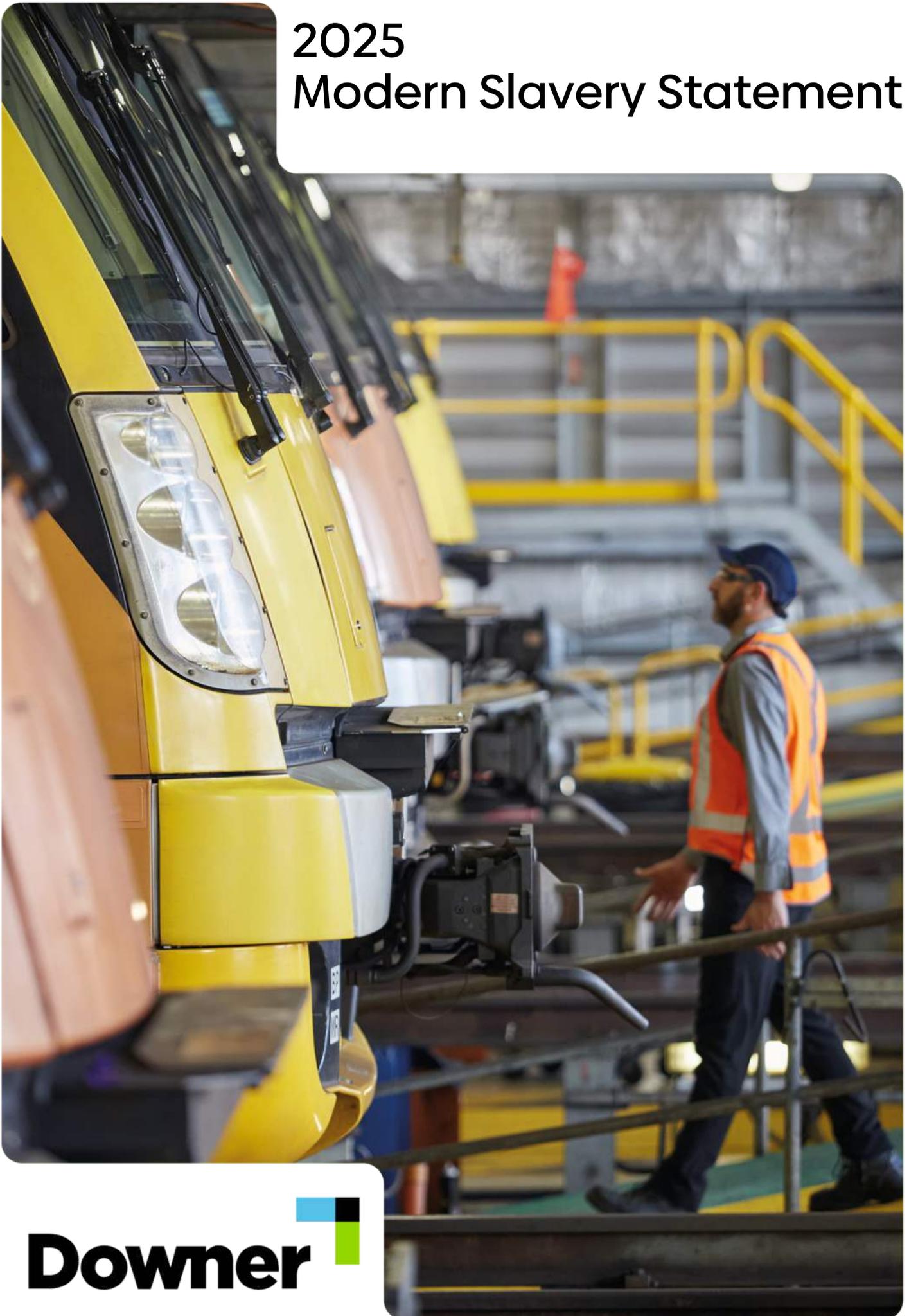


# 2025 Modern Slavery Statement



## Acknowledgement of Country

Downer acknowledges Aboriginal and Torres Strait Islander peoples as the First Australians and the Traditional Custodians across Australia.

We would like to acknowledge and pay our respects to the Elders of the past, present and future in maintaining the culture, Country and their spiritual connection to the land.

## WHAKATAUKĪ

Whakatauki Ko te whānau, ko te manaaki, ko te kairangatira, ko te ngākau pono ngā tikanga tuku iho hei korowai mo tatou. Ko te Kauri i whakawhiwhi haumaruru, ko te Rimu i whakawhiwhi taonga, ko te Tōtara i whakawhiwhi whanaungatanga, ko te Kahikatea i whakawhiwhi whakaaro matakite. Ngā pou e whā i aumangea ai te whakatauki 'Mā te whanaungatanga ka angitū'. Hui e! Taiki e!

We are held together by our closely held values of family and relationships, care and respect, excellence and integrity. The Kauri connects us to Safety, the Rimu connects us to Delivery, the Tōtara connects us to Relationships and the Kahikatea connects us to Thought Leadership. These are our four Pillars upon which we build 'Relationships creating success'. United and ready to move forward!

## Do you have a modern slavery concern?

Our Voice is an external, independent service which allows people to report behaviour that is inappropriate, unethical, corrupt or illegal, including concerns about modern slavery. All reports made to Our Voice may be made anonymously.

### Phone

**1800 448 041**  
(free call from within Australia)

**0800 404 509**  
(free call from within New Zealand)

**800 6167 042**  
(free call from within Singapore)

**Email**  
[ourvoice@deloittedigital.com](mailto:ourvoice@deloittedigital.com)

### Letter

Reply Paid 12628, A'Beckett Street, Melbourne VIC 8006, Australia

PO Box 912028, Victoria Street West, Auckland 1142, New Zealand

### Online

<http://www.ourvoice.deloittedigital.com>  
(user name and password: downer)

# What's inside

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# Introduction from our CEO

## Downer is guided by our Purpose, 'Enabling Communities to Thrive'.

Achieving this Purpose is not just about the services we deliver, which impact millions of people every day, it's also about *how* we deliver them - with respect, integrity and always with our communities' best interests at heart.

This includes supporting the success of our 26,000 strong trans-Tasman workforce, as well as our supply chain of more than 20,000 delivery partners.

We recognise that our extensive operations and supply chains may present modern slavery risks, and we are committed to helping protect human rights in everything we do. We also strive to leverage our size and scale to influence others to do the same.

In FY25, we continued to develop and execute strategies to help us identify and address modern slavery risk. This included:

- Trialling a new third-party data provider to obtain verified human rights data, which can assist in managing risk within our supply chain.
- Continuing to roll-out Downer's supplier management platform, with 8,503 suppliers assessed as part of the pre-qualification process, which includes screening for modern slavery risk.
- Completing a solar panel market scan, as well as a review of our own pre-qualification and due diligence processes for solar panel suppliers and manufacturers.
- Continuing to educate and raise awareness amongst our people, joint ventures, suppliers and subcontractors through the production of communication material, and delivery of training sessions.

This is Downer's sixth modern slavery statement. We acknowledge that there is still work to do and we are committed to achieving more transparency and a better understanding of our own modern slavery risks, giving us the ability to continuously improve - and enable communities to thrive.

A handwritten signature in black ink, appearing to be 'Peter Tompkins', written in a cursive style.

**Peter Tompkins**  
Chief Executive Officer

# Criteria 1 – About this Statement

This Modern Slavery Statement (Statement) is made by Downer EDI Limited as a joint statement under the Commonwealth Modern Slavery Act 2018 (Modern Slavery Act), for the period 1 July 2024 to 30 June 2025 (referred to as the reporting period for HY26).

Downer EDI Limited (ABN: 97 003 872 848) is an Australian public company listed on the Australian Securities Exchange (ASX: DOW) and is a foreign exempt issuer on the New Zealand Stock Exchange (NZX: DOW). The Company is registered at Level 2, Triniti III, Triniti Business Campus, 39 Delhi Road, North Ryde NSW 2113.

In accordance with the requirements of section 14(2)(d)(ii) of the Modern Slavery Act, this Statement was approved by the Board of Directors of Downer EDI Limited (Board) on 22 October 2025, and is signed by the Chief Executive Officer of Downer EDI Limited (see page [3](#)).

The Statement applies to and describes the steps taken by Downer EDI Limited and its controlled entities (refer to Appendix pages 24-26) to mitigate modern slavery in its operations and supply chains.

All data references in this Statement are for HY26 unless otherwise stated.

## Important notice and disclaimer

The information in this Modern Slavery Statement (Report) has been prepared by Downer EDI Limited ABN 97 003 872 848 (Downer or the Company).

This Report may contain statements that are, or may be deemed to be, forward-looking statements. Such statements can generally be identified by the use of words such as “looking-forward”, “expect”, “will”, “may”, “intend”, “seek”, “continue”, “plan”, “objective”, “estimate”, “potential”, “anticipate”, “believe”, “risk”, “aim”, “target” and similar expressions. Indications of plans, strategies, management and company objectives, performance are also forward-looking statements. Such statements are not guarantees of future performance, and involve known and unknown risks, uncertainties, assumptions, contingencies and other factors, many of which are outside the control of the Company.

The information contained in this Report includes information derived from publicly available sources that have not been independently verified.

Readers are cautioned not to place undue reliance on any financial information included in this Report. The information in this Report has not been subject to third party audit or review.

# Criteria 2 – Downer’s structure, operations and supply chain

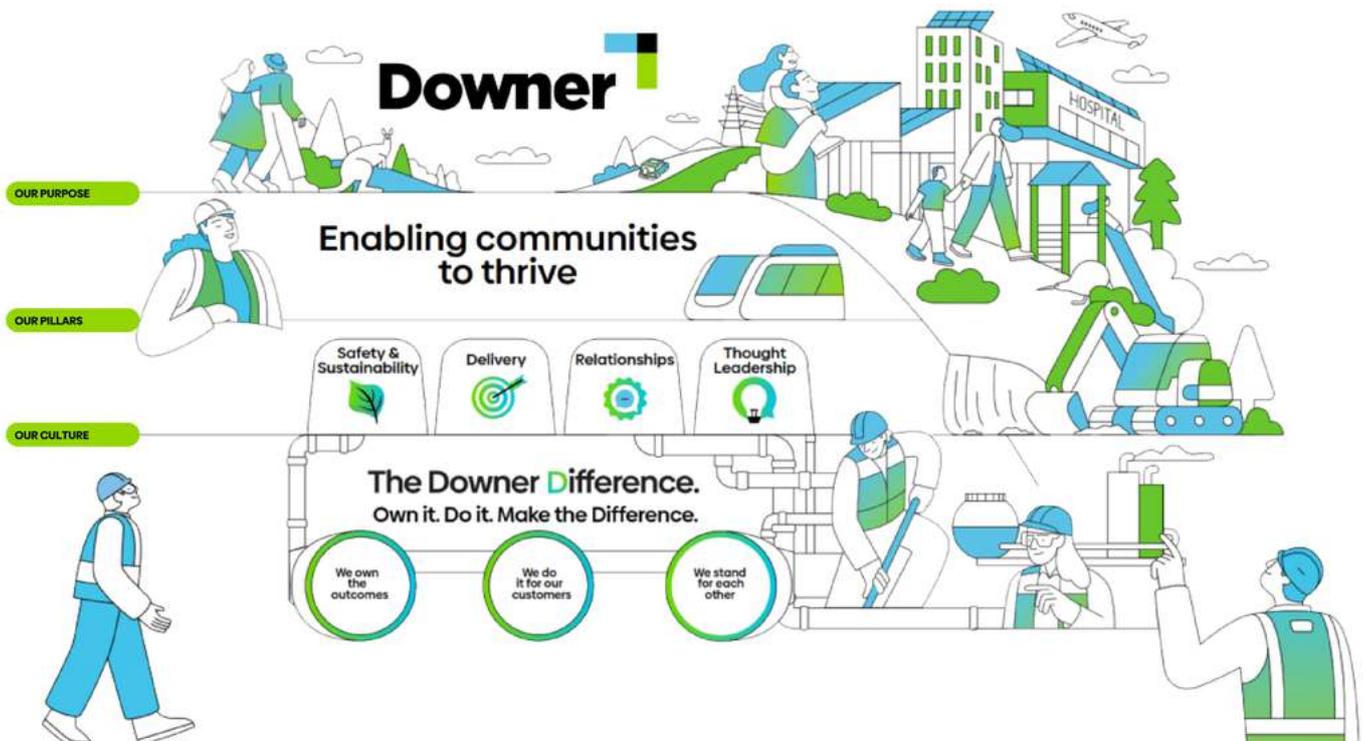
Downer EDI Limited (Downer) is a leading provider of integrated services across Australia and New Zealand, delivering and maintaining essential infrastructure that enables communities to thrive.

The demand for our services is shaped by investment in the energy transition, defence capability, government services and infrastructure expansion necessary to support population growth, and local industry revitalisation.

The sectors where we operate include roads, rail, ports and airports, power, gas, water, telecommunications, energy networks, health, education, defence, and other government sectors.

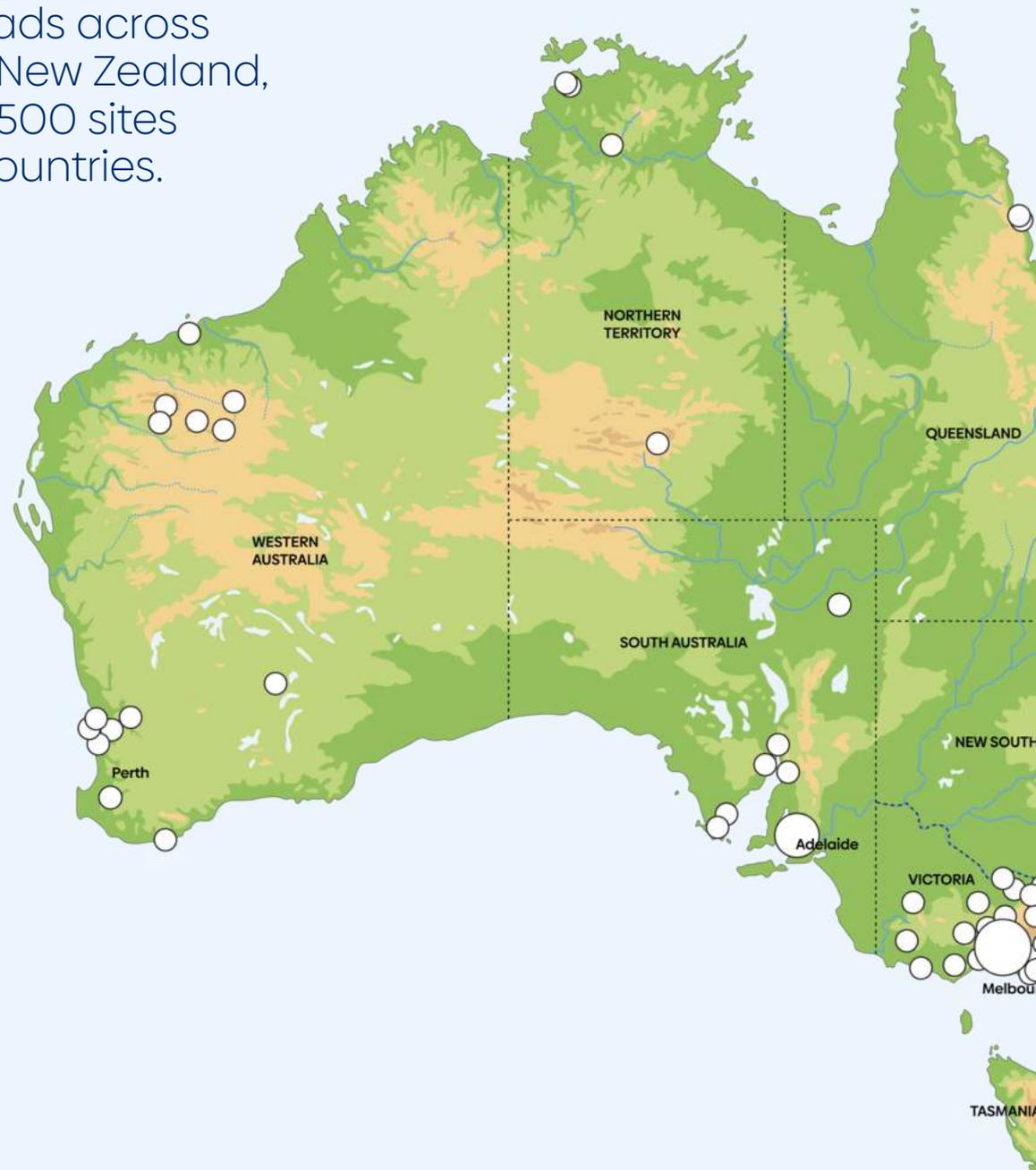
Downer is one of Australia’s and New Zealand’s largest private sector employers, with approximately 26,000 people, who are united by our high-performance culture, known as ‘The Downer Difference’.

For more information visit [downergroup.com](https://downergroup.com).



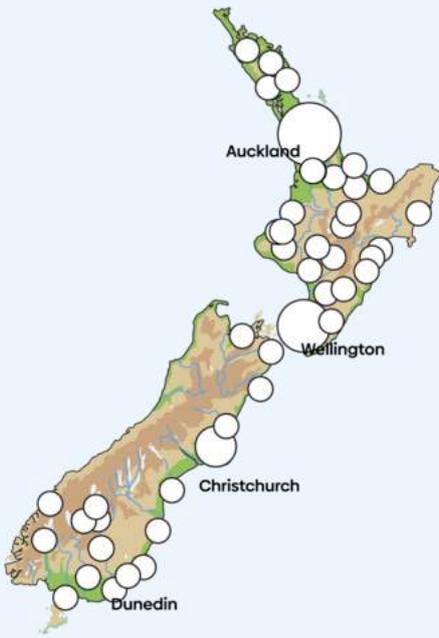
# Where we operate

Downer's geographical footprint spreads across Australia and New Zealand, at more than 500 sites across both countries.



## Our workforce\*\*\*

Downer is one of the largest employers in Australia and New Zealand.



**3 Female / 4 Male**  
on the Downer Board

**25,815**  
direct employees  
(18,023 in Australia  
7,737 in New Zealand  
55 other International)

**22%**  
Women in Management positions

<b>27%</b>	<b>27%</b>
women in our workforce	women in Executive positions

**1.97%**  
Aboriginal and Torres Strait Islander employees\*  
  
(Total number of Aboriginal and Torres Strait Islander peoples is determined through self-disclosure during the hiring process)

**71% full-time**  
**9% part-time**  
**20% casual**

**15.6%**  
Māori employees\*\*  
  
(Total number of Māori peoples determined through self-disclosure during the hiring process)

\* % of Aboriginal and Torres Strait Islander employees is calculated as a % of the total workforce in Australia.  
 \*\* % of Māori employees is calculated as a % of the total workforce in New Zealand.  
 \*\*\* All figures as at 30 June 2025.

# What we do

Downer delivers essential services to our customers in the Transport, Energy & Utilities and Facilities sectors across Australia and New Zealand. These services touch the lives of millions of people every day and enable communities to thrive.

## Energy & Utilities

Downer's Energy & Utilities segment comprises its Telecommunications, Power & Gas, Water and Industrial & Energy businesses.

Downer is a market leader in designing, building, operating and maintaining critical energy, water and telecommunications infrastructure, delivering end-to-end solutions that support millions of people across Australia and New Zealand.

## Transport

### Transport & Infrastructure Rail & Transit Systems

Downer is a market leader in transport infrastructure, providing end-to-end solutions that support safe, efficient and reliable journeys across Australia, New Zealand and the Pacific.

Downer's Transport segment comprises its Road Services, Rail & Transit Systems and Projects businesses.



## Facilities

### Social Infrastructure & Citizen Services

Downer's Facilities segment comprises its Government, Defence, Health and Education businesses.

Downer provides end-to-end facilities management services across defence, health, education and government sectors, supporting critical operations through comprehensive solutions that enhance environments, maintain essential assets and enable high-quality service delivery.

# Our supply chain

For the purposes of this Statement, we define our 'supply chain' as the products and services (including labour) that contribute to Downer's own products and services. Throughout the Statement we refer to our direct spend or our direct suppliers, which are those we contract with directly. We recognise that our supply chain extends beyond our direct suppliers and subcontractors, as well as products and services sourced outside of Australia or New Zealand.

Given the broad range of services we deliver, and the geographic locations our operations cover, Downer has a large and complex supply chain containing small, medium and large suppliers. Our procurement activities range from the delivery of large scale infrastructure projects, road maintenance, rollingstock manufacturing and delivery, to facilities management services. In FY25, we spent \$6.8 billion (AUD) with approximately 21,000 suppliers.

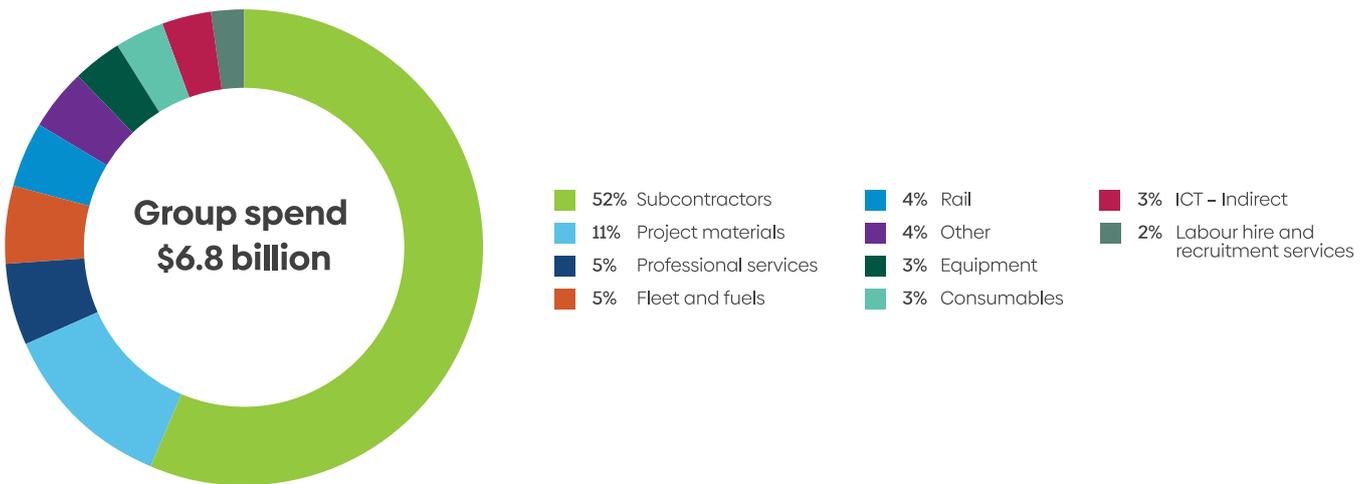
The infographic on this page illustrates the breakdown of spend across our top 10 spend categories. Subcontractors, project materials and professional services are our top spend categories, which is consistent with FY24.

Downer has limited visibility of the supply chain beyond our direct suppliers. We have commenced supply chain mapping exercises over the last two financial years for our high risk supply chains. The bitumen supply chain mapping was completed during FY24 and outlined in the FY24 Modern Slavery Statement. During FY25, we conducted due diligence of a solar panel manufacturer in China, including retrieving their supply chain chart.

The majority (99.2%) of Downer's direct spend is with suppliers located in Australia and New Zealand, considered low-risk countries, though this does not mean their products are domestically produced. Sourcing from contractors and suppliers located in countries considered of high risk is also necessary at times to meet the requirements of specific projects or other internal needs.

Country risk is informed by the Sedex platform and is updated annually. The risk score for each country is made up of several indicators. These include but are not limited to; forced labour, child labour, gender inequality, discrimination, working hours and freedom of association.

## Downer spend segmentation (top 10 spend categories)



# Criteria 3 – Identifying modern slavery risks in our operations and supply chain

## Our operations and operational risk

For the purposes of this Statement, we define our 'operations' as activities undertaken by Downer to pursue its business objectives and strategy, including the direct employment of workers. The risk of modern slavery in our immediate workforce is deemed to be minimal, and is based on Downer's established governance, onboarding, training and compliance structures.

As at 30 June 2025, our total number of employees was 25,815.

Employees by contract type and gender is tabled below:

Contract type	FY25 Female	FY24 Female	FY25 Other/ Indeterminate	FY24 Other/ Indeterminate	FY25 Male	FY24 Male	FY25 Total	FY24 Total
<b>Permanent</b>	4,695	4,927	5	4	13,460	13,744	18,160	18,675
Full-time	3,682	3,727	3	1	12,731	13,087	16,416	16,815
Part-time	1,013	1,200	2	3	729	657	1,744	1,860
<b>Temporary</b>	2,298	4,350	4	3	5,353	7,580	7,655	11,933
Full-time	632	921	0	0	1,261	1,926	1,893	2,847
Part-time	377	707	1	0	237	557	615	1,264
Casual	1,289	2,722	3	3	3,855	5,097	5,147	7,822
<b>Total</b>	<b>6,993</b>	<b>9,277</b>	<b>9</b>	<b>7</b>	<b>18,813</b>	<b>21,324</b>	<b>25,815</b>	<b>30,608</b>

Employee Headcount	Unit	FY25	% change compared to FY24
New Zealand	No.	7,737	
– Percentage breakdown	%	30.0 %	(3.2)%
Australia	No.	18,023	
– Percentage breakdown	%	69.8 %	3.2 %
Other	No.	55	
– Percentage breakdown	%	0.2 %	– %
<b>Total</b>	<b>No.</b>	<b>25,815</b>	

Downer is a large organisation with operations in some sectors considered at higher risk of modern slavery. Examples of these include infrastructure projects, facilities services, cleaning and security services. Migrant workers in these sectors may be more vulnerable to exploitation and may face challenges such as language barriers, limited knowledge of workplace rights and regulations, and in some cases exposure to human trafficking.

Downer has a dedicated Industrial Relations team, leading a specialised compliance working group that is focused on oversight and continuous improvement of employment rights and labour rights.

Core areas of focus include:

- Annual assessment of enterprise agreements and modern award payroll configurations in line with the Fair Work Commission's Minimum Wage Decision.
- Review of relevant work conditions, which include, but are not limited to, compensation, working time, rest periods, leave entitlements and dismissal practices.
- Implementation of contractual terms and monitoring programs to review employment practices and labour rights within our relationships with our outsourcing partners, joint ventures, contractors and suppliers.
- Respecting our people's rights to freedom of association and collective bargaining. In FY25, 45% of our workforce across Australia and New Zealand were covered by collective agreements.

During FY25, Downer continued to be a member of CAF (Cleaning Accountability Framework). CAF was born out of a recognition that ending exploitation of cleaners needs an industry approach.

## Our supply chain risk

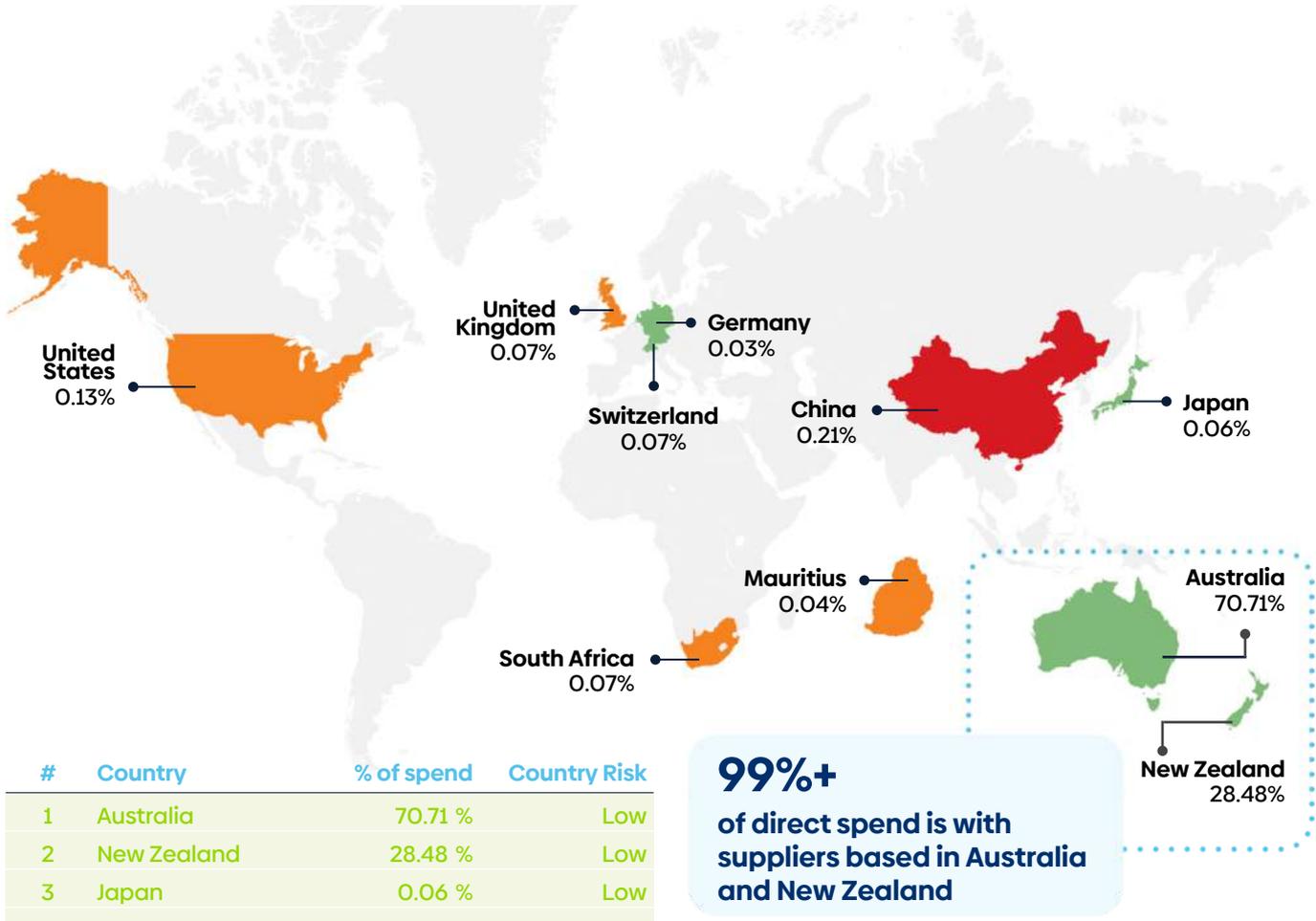
Due to the size of Downer's supply chain, we take a risk-based approach to how we manage modern slavery. We use various tools to assist us when identifying potential modern slavery risk and when setting priorities for further due diligence.

Downer's internal modern slavery risk matrix considers spend together with country and category risk. In addition to that, during FY25, we have been trialling a third-party data provider, providing us with verified publicly available human rights data which has enabled us to extract reports on suppliers, providing an overview of any risks to consider and an overall risk rating. The information has been an additional source of data adding to the risk rating our matrix has provided.



Country risk is informed by the Sedex platform and is updated annually. The risk score for each country is made up of several indicators. These include but are not limited to; forced labour, child labour, gender inequality, discrimination, working hours and freedom of association. Several publicly disclosed indexes from reputable sources inform each indicator resulting in an overall score.

**Location of our direct suppliers and their country risk – categorised by spend (showing top 10)**



#	Country	% of spend	Country Risk
1	Australia	70.71 %	Low
2	New Zealand	28.48 %	Low
3	Japan	0.06 %	Low
4	Germany	0.03 %	Low
5	United States	0.13 %	Medium
6	Switzerland	0.07 %	Medium
7	South Africa	0.07 %	Medium
8	United Kingdom	0.07 %	Medium
9	Mauritius	0.04 %	Medium
10	China	0.21 %	High

**99%+**  
of direct spend is with suppliers based in Australia and New Zealand

Downer utilises the Sedex platform to inform country risk.

Downer’s majority (99.28%) of our direct supply chain spend is with suppliers based in low-risk countries, 0.38% is with medium-risk countries and only 0.21% of our spend is with countries considered high risk of modern slavery. We are continuing to focus on deepening our understanding of the high-risk categories beyond our direct suppliers. An example of how we have gained better overview of one of our high-risk supply chains, solar panels, beyond direct suppliers can be found in Criteria 4.

The areas of focus for FY25 have been determined by considering a combination of high risk suppliers and projects undertaken, spend, category risk, country risk and supply chain model.

Below are examples of supply chain risks of focus for Downer:

Renewable energy	<p>Risks of modern slavery may exist in many stages of the manufacturing of renewable energy equipment, including mining of polysilicon and minerals forming part of solar panels and batteries.</p> <p>There remain concerns that Uyghur forced labour is used to produce the metallurgical grade silicon and polysilicon (used in the production of solar panels) originating from the Xinjiang region in China. Risks of forced labour and child labour have been linked to the mining of cobalt in the Democratic Republic of Congo, a mineral used in many batteries.</p> <p>Group Procurement consults regularly with the Downer New Energy team to discuss commercial needs and appropriate management of any potential risks (for solar and batteries).</p> <p>Downer has been monitoring the development and drafting of the Code of Practice on Management of Modern Slavery risks in the Renewable Energy Value-Chains, which is being drafted by the Clean Energy Council and the NSW Anti-Slavery Commissioner.</p>
Cleaning and security	<p>The cleaning and security services sectors are considered high risk as they may involve subcontracting, temporary migrant workers, international students and vulnerable workers with limited ability to speak English. Downer directly employs cleaning staff as well as subcontracts.</p> <p>Downer is a member of CAF (Cleaning Accountability Framework), to help us better understand how we can best protect the rights of cleaning staff.</p>
Project and raw materials	<p>Project and raw materials is one of Downer's highest spend categories. Modern slavery risks can exist in many stages of the materials supply chain. Some of those materials, or components of them, may be sourced from offshore suppliers which will increase the risk. Examples of those relevant to Downer include bitumen (see supply chain mapping in Downer's FY24 Modern Slavery statement), steel and aluminium. For steel and aluminium products, there may be a risk forced labour, child labour or other modern slavery like practices have been utilised in the upstream supply chain to produce those products.</p>

## Labour hire

Downer from time to time requires the use of labour hire companies. Downer has a Group-managed panel of approved labour hire providers for Australia and New Zealand. Providers on the Downer Group Labour Hire Panel have gone through due diligence and are contracted under a Master Framework Agreement, the Downer Labour Hire Service Agreement, which includes obligations regarding modern slavery. Relationships are actively maintained with the approved providers, contributing to mitigation of risks, open communication and ongoing improvements.

## International sourcing

The majority of Downer's direct spend is with suppliers located in low-risk countries – being countries with operations in Australia and/or New Zealand. Sourcing from contractors and suppliers located in countries considered high risk is also necessary at times to meet the requirements of specific projects or other internal needs.

With several projects in the bid and delivery phase during FY25, Downer has been exposed to international supply chains. For each of these projects, the approach and level of due diligence varies depending on the assessed risk level. This may include third party audits, in-person audits by Downer staff, site visits, and supplier questionnaires, as well as collaboration with our clients.

# Criteria 4 – Actions to address our modern slavery risks

## Downer modern slavery response process

### Governance and tools

Downer’s approach to corporate governance aims to:

- Maintain our ‘licence to operate’ by striving to adhere to ethical standards, legal requirements and best practice business operations.
- Work towards higher levels of business ethics, integrity and transparency.
- Effectively manage our risks and opportunities by continuing to strengthen our systems, processes and controls.

The Modern Slavery Program is managed at a Group level by the Group Procurement and Property function. The overall responsibility for modern slavery risk sits with the Downer Board.

### The Downer Standard (TDS)

TDS is Downer’s Integrated Management System. TDS provides a structure to help govern and sustain processes and capabilities.

TDS policies and procedures are owned, maintained and improved by a network of Group Process Owners and Business Unit Quality Leads. This helps provide governance, leadership and accountability across all key areas of our business.

Internal and external audits, including of international quality standards and accreditation, provide assurance on compliance with TDS. Management provide certification of compliance with certain TDS as part of the year-end Financial & Corporate Governance Self Assessment (FCGSA) process.

### Other governance mechanisms

In addition to TDS, Downer has a number of governance tools and procedures that assist us in our modern slavery response. These are outlined below.

Tool/Procedure	Purpose	Distribution
Standards of Business Conduct	Sets expectations for how our people, contractors and suppliers are to conduct business, incorporating topics including modern slavery.	Available on the Downer website and as part of TDS library on the Downer Intranet.  Available to subcontractors and suppliers via Downer’s pre-qualification platform.
Business Integrity Policy	Provides for the reporting of any misconduct or improper conduct in relation to Downer, including behaviour that is inappropriate, unethical, corrupt or illegal. The policy explains options for reporting, including whistleblowing and the Our Voice service (detailed on inside front cover).	Available on the Downer website, and as part of TDS library on the Downer Intranet.
Procurement Framework	Provides a structured approach to streamline the process of acquiring goods and services. It includes predefined procedures, rules and guidelines designed for transparency, consistency and efficiency in the procurement process. It includes both sustainable and social procurement considerations.	Available as part of TDS library and on the Group Procurement intranet page.
Modern Slavery Due Diligence Procedure	Procedure for due diligence on suppliers in relation to modern slavery.	Available as part of TDS library and on the Modern Slavery intranet page.

Tool/Procedure	Purpose	Distribution
Modern Slavery Supplier and Subcontractor Checklist	Checklist and process to be completed prior to engaging with any supplier on the Supplier Watchlist.	Available as part of TDS library and on the Modern Slavery intranet page.
Modern Slavery Risk Dashboard	Dashboard classifying suppliers by country, category and spend to provide an overall risk rating and provide buyers with an enhanced understanding of modern slavery risks in relation to supplier choice. Data from Sedex informs the country risk, which is updated annually.	Available on the Modern Slavery intranet page.
Modern Slavery intranet page	Intranet page including governance, tools, training and links to internal and external information.	Available on the Downer intranet.
Supply Chain Mapping Toolkit	Toolkit consisting of templates for interviews, reports and mappings.	Available from Group Procurement.
Supplier Watchlist	Internal list of high-risk suppliers, requiring approval from Group Procurement prior to engagement.	Available on the Modern Slavery intranet page.
Social, Sustainable Procurement and Modern Slavery e-module	E-module training, covering modern slavery.	Available to staff on the Downer Learning platform.
Mandatory compliance training	E-module training on Standards of Business Conduct and Workplace behaviour mandatory to all staff, with refresh training required every two years.	Available to staff on the Downer Learning platform.

## Grievance and remediation

Downer provides several avenues for reporting misconduct, including modern slavery. Reporting can be made to a staff member's direct manager or supervisor, or with the head of the business unit. Alternatively, a report can be made to Downer's Group General Counsel or the Company Secretary (Downer's Whistleblowing Protection Officers). If none of these options are preferred, reports can be made to Downer's external reporting service 'Our Voice'. This service is available to any current or former employee, contractor, supplier, consultant or service provider. Reports can be made on an anonymous basis, and all information is treated confidentially.

Information on how to raise a concern via Our Voice is outlined in the Standards of Business Conduct and in the Business Integrity Policy, which can both be accessed via the Downer website or on the Downer intranet. Additionally, information has been included in toolbox talks and subcontractor packs. Posters have also been designed for relevant worksites.

During FY25, we received no reports of suspected modern slavery.

## Supplier pre-qualification

The roll-out of Downer's supplier management platform continued through FY25. During FY25, the total number of suppliers assessed within this platform was 8,503. Out of those, 3,177 were new suppliers and 5,326 were existing suppliers. New and existing suppliers need to complete a pre-qualification, which includes mandatory modern slavery questions.

The mandatory modern slavery questionnaire has prompted conversations around modern slavery with our suppliers. Due to the varied size of our suppliers, the level of awareness of modern slavery is still varied. We include links to Government websites, providing information on modern slavery legislation and reporting requirements as part of the pre-qualification process.

We continue to work on further solutions to enhance our supplier management platform. Over the past 12 months, we have introduced several identification tags within the platform, for example relating to Social Traders, Supply Nation and Kinaway certifications, making it easier for our staff to identify pre-qualified diverse suppliers.

During FY25, Downer trialled a third-party data provider, providing human rights data, which can assist us with risk management of our suppliers. We have been able to draw reports on individual suppliers, flagging their risk rating based on risk events, geographic and category risk and the level of control measures in place to remediate the risks.

## Supplier audits and site visits

From time to time, Downer may conduct audits and site visits of key suppliers. This may be as part of pre-qualification requirements for certain high-risk categories or as part of regular supply chain management activities. The audits are conducted by Downer staff or by a third party. For select suppliers at high risk of modern slavery, we conduct third-party social audits, such as Sedex Members Ethical Trade Audits (SMETA).

As an example, during a sourcing activity for the Energy & Utilities business unit, Downer and its third-party auditors conducted in-person offshore factory audits of several prospective suppliers delivering steel structures. The audit covered many aspects including supply chain management, governance, quality control, safety and environment. Modern slavery, forced labour and child labour indicative questions were included.

## Training

### Increasing our people's understanding of modern slavery

We continue to educate and raise awareness amongst our people, joint ventures and suppliers.

During FY25, 532 staff members completed the Social, Sustainable Procurement and Modern Slavery e-module training session.

Downer's Manager Sustainable Sourcing delivered a training session on modern slavery to our Safety Focused Performance Joint Venture (SFPJV) in July 2024. The online webinar session was attended by 53 representatives from Downer as well as our joint venture partners. The session was focused on what modern slavery is, what it looks like globally and in Australia, how to report a concern and where to get more information as well as Downer's approach to manage potential risks.

Additionally, a training session was held for one of our internal bid teams, upskilling them on the risks of modern slavery and what Downer is doing to mitigate those risks.

Communication packs have also been developed for internal use, including content for toolbox talks, newsletters and training information. These were distributed to the Communication Leads of each Business Unit.

## Risks beyond direct suppliers

In FY24, we initiated a market scan of the solar panel market and subsequently a review of our pre-qualification and due diligence process for solar panel suppliers/manufacturers. This exercise was completed during FY25.

As our New Energy business was looking at onboarding a new solar panel supplier, we began a due diligence process consisting of reviews of the suppliers' ESG documentation, which included a recent SMETA audit report and Corrective Actions report, including evidence of corrective actions having been addressed. The supplier was required to respond to a comprehensive questionnaire specifically tailored for offshore sourcing and provide a supply chain chart, listing each supplier and their location. The supplier provided a signed declaration with commitment to ethical practices in their operations and supply chain. The supplier must provide notification should there be any changes to the supply chain chart.

## Diversifying our supply chain

Modern slavery can disproportionately affect people who are already marginalised, including those with limited capacity to advocate for themselves or access support systems – this includes, temporary migrant workers, women, people with a disability, people experiencing family and domestic violence, asylum seekers and refugees.

Employment-generating social enterprises actively work to provide employment pathways and training and wrap-around supports to reduce vulnerability, improve resilience, build economic independence, and disrupt the conditions that place marginalised people at risk of modern slavery.

Downer has been a member of social enterprise certifier Social Traders since 2017, and a Leadership member since 2021. As a Leadership member, we work closely with Social Traders to identify opportunities to support social enterprises. This is one way we can provide support to vulnerable groups of people and communities. Downer's spend with Social Traders certified social enterprises has steadily increased year-on-year and we are proud to have been announced Social Traders' 'Big Spender' for FY24, having spent \$12.54 million (AUD). The announcement was made in conjunction with the launch of Social Traders' FY24 Impact report on 27 March 2025.

We also support Indigenous communities through various programs and by engaging Supply Nation and Kinaway suppliers in Australia, and Amotai certified suppliers in New Zealand.



## CASE STUDY

# Modern slavery risks in Infrastructure projects

Downer's Hawkins business delivers large and complex infrastructure projects across New Zealand, working collaboratively with clients, designers, stakeholders, subcontractors and suppliers.

The scale and complexity of these projects present a higher risk of modern slavery, particularly due to the vulnerability of migrant workers. These individuals may face challenges such as language barriers, limited knowledge of workplace rights and regulations and in some cases, exposure to human trafficking.

Subcontractors play a significant role in project delivery, which can reduce direct visibility over the workforce and supply chain. Migrant workers are occasionally engaged through these subcontractors, and Hawkins has implemented processes to minimise the risks of exploitation. To monitor compliance and worker protection, Hawkins subcontractor agreements include clauses requiring all workers to hold valid visas permitting them to work in New Zealand. Workers must sign a declaration upon site entry, confirming their visa status. All workers complete Health and Safety training and must obtain a 'Site Safety Pass'.



Workplace safety training is also available in multiple languages, and interpreters can be arranged if required.

### Client collaboration

Hawkins is currently delivering a major infrastructure project in New Zealand, working closely with the client to manage potential modern slavery risks across operations and the supply chain.

To raise awareness, a toolbox talk was held on 3 June 2025, attended by over 200 workers. It covered signs of modern slavery and Downer's anonymous 'Our Voice' whistleblowing service.

As an infrastructure project involving subcontracting, we are working collaboratively with the client on the best approach to manage potential modern slavery risks in the supply chain and in the operations whilst delivering the project.

A facial recognition check-in system has been introduced to prevent unauthorised access, which will be critical as the project scales over the next year. The partnership will continue into FY26 with ongoing risk management. Awareness posters, highlighting indicators and reporting options have been rolled out across Hawkins projects.

## CASE STUDY

### International sourcing – India site visit

As part of the sourcing and selection of a provider for business processing services, site visits to two potential providers in India were conducted by Downer personnel. The primary purpose of the visits was to gain an understanding of each company's culture and to validate the capability and knowledge related to service delivery in line with the sourcing requirements. In addition, due diligence activities related to working conditions and welfare were conducted.

The assessment of working conditions and welfare included reviewing the condition of the facilities, health and safety conditions, inclusivity, security, infrastructure, technology and adherence to local labour laws.

The Downer team met with senior leadership and workers. Interviews with workers were conducted by Downer representatives without management input or oversight. The overall feedback from workers was positive and they displayed a high level of satisfaction.



The preferred provider offers many beneficial services for employees such as childcare (on some sites), recreational amenities, medical and accident care plans, grievance mechanisms including 24/7 hotline and an online portal where reports of any concern can be made on an anonymous basis, and the provision of counsellors for personal matters.

There is a large focus on diversity and support provided for women in the workforce, women mentorships, supporting education, digital literacy and supporting marginalised groups.

# Criteria 5 – Assessing the effectiveness of our actions

Downer has taken steps to assess the effectiveness of its modern slavery program in our operations and supply chain, as outlined below:

Focus Area	Objective	Targets	Outcome
Risk approach	Review the solar panel market and pre-qualification/due diligence requirements.	Understand the changes that have occurred in the solar panel market and how we can manage pre-qualification and risk management of potential suppliers moving forward.	Due diligence was completed with the selected supplier disclosing their supply chain chart and providing a signed declaration, committing to ethical practices in their operations and supply chain.
Risk approach	Pre-qualification screening.	Continue onboarding new and existing suppliers on our pre-qualification technology platform.	During FY25, 8,503 suppliers completed the pre-qualification processes and were screened for modern slavery risk.
Training and capacity building	Continue educating our people.	Communications pack to be distributed to each Business Unit including resources for toolbox talks, e-learn module training information, and newsletter content.	Communication packs were sent out to the Communication Leaders of all Business units, During FY25, 532 staff members completed the Social, Sustainable Procurement and Modern Slavery e-module training session. An online session was delivered to one of our Joint Ventures which was attended by 53 representatives from Downer and our Joint Venture partners. Training was also delivered to one of our internal bid teams.
Training and capacity building	Educating our suppliers/ subcontractors	Include training in the subcontractor e-learn module induction training.	Due to the complexity of our supply chain and the vast range of products we procure, it has not proved practical to introduce standardised e-module training to our suppliers. An example of action taken in FY25 is the development of toolbox talks and awareness posters for our Hawkins project sites. Over 200 workers attended the first toolbox talk at our Auckland project site on 3 June 2025.
Risk approach	Trial a third-party solution for human rights data.	Trialling a human rights business analysis data solution. This may provide us with more information as to where potential risks may exist in our supply chain.	This trial is complete. Downer continues to work with the provider to find a solution to further implement this into our internal systems. We continue to actively investigate options to improve the quality of data and information we have access to.

# Criteria 6 – Consultation process

Downer's modern slavery governance and risk management program is managed centrally, with procedures documented as part of TDS.

Consultation and collaboration Group-wide and with the Business Units has taken place and is detailed in this Statement, including infrastructure projects within the Hawkins business, and international sourcing initiatives across several Business Unit projects and Group-managed services such as Information, Communication and Technology.

Group-wide consultation has been ongoing as part of the pre-qualification of suppliers and the introduction of tendering as part of our Source to Contract project.

## Memberships and external consultation

Supplier Ethical Data Exchange (Sedex)	Sedex is a not-for-profit organisation that promotes ethical and responsible business practices in global supply chains. Downer is a member of Sedex and uses the organisation's tools and data to inform our internal Modern Slavery Risk Matrix, which includes consideration of risk factors associated with forced labour, freedom of association, children and young workers, wages, working hours, discrimination, gender and labour standards.
Cleaning Accountability Framework (CAF)	Downer is a member of CAF, an anti-slavery initiative in the cleaning industry supply chain. CAF's work is based around the UN Sustainable Development Goal 'Decent work', and it provides resources and advice to members on how to improve the management of modern slavery risks in the cleaning industry.
Third-party human rights data	Downer has trialled a third-party Human Rights data provider. This has provided us with more data to inform our risk rating approach of suppliers. We continue to explore opportunities to improve our data sources.

## Capacity building collaboration

### Infrastructure Sustainability Council – Modern Slavery Coalition

Downer is a founding member of the Infrastructure Sustainability Council's (ISC) Modern Slavery Coalition. The Coalition was established in 2019 in response to the introduction of Australia's Modern Slavery Act 2018. The coalition aims to accelerate the eradication of modern slavery from infrastructure supply chains by shifting industry from a place of reactive compliance to one of transformational leadership. Co-chaired by Transurban and Pillar Two (a human rights and modern slavery advisory firm), the coalition meets regularly.

Throughout the year. Member organisations share lessons learnt and their own experiences and challenges with managing modern slavery risks. During FY25, the coalition members continued to work collaboratively to progress a series of modern slavery related knowledge sharing, capacity building and due diligence initiatives.

## Industry conferences and events

Downer representatives regularly attend industry forums, webinars and events hosted by Government and Non-Government Organisations (NGOs). We believe collaboration helps us to manage and make progress in addressing the complexity of modern slavery.

In FY25, Downer representatives attended:

- Infrastructure Sustainability Conference October 2024
- The NSW Anti-slavery Forum (Online May 2025)
- Collaborative Advantage (New Zealand) – sessions on modern slavery and human rights co-hosted by Deloitte New Zealand, Walkfree Foundation and Sustainable Business Council
- Social Traders networking and showcase events throughout the year, in person and online across Sydney and Melbourne.



# Criteria 7 – Looking forward

## Plans for FY26 and beyond

For FY26, some of our focus areas include:

Focus Area	Objective	Targets
Training and capacity building	Continue educating our people.	Continue promoting awareness training across the business.
Training and capacity building	Review and update of the internal modern slavery repository of information.	Collaboration with internal teams to get feedback on relevant information to make available in our modern slavery repository, with the goal to enhance access to information and increase the level of awareness internally.
Risk assessment and mitigation	Implementation of a Group-wide tendering platform including, revised modern slavery questions and criteria.	Commence implementation of tendering as part of our Source to Contract project across the business.
Risk assessment and mitigation	Implementation of a new spend classification tool.	Gaining a more granular overview of supplier spend and associated categorisation.
Risk approach	Continue working with the Hawkins business on modern slavery risk management approach in infrastructure projects.	Work collaboratively with staff, clients, suppliers and subcontractors to implement initiatives to educate, raise awareness and to manage any potential modern slavery risks in the delivery of our infrastructure projects.
Risk approach	Continue onboarding and pre-qualifying suppliers (new and existing) onto our supplier management platform.	Completion of pre-qualification of suppliers that represent more than 80% of our spend.

## Current and future legislative climate

### Australia

The inaugural Australian Anti-Slavery Commissioner Mr Chris Evans was appointed to the position on 7 November 2024 for a five-year term. The commissioner sought input for the Anti-Slavery Commissioner’s Strategic Plan 2025-2028 in March 2025. The finalised Strategic Plan is yet to be published.

The role of the Australian Anti-Slavery Commissioner is to strengthen Australia’s response to modern slavery risks, provide leadership in raising awareness of the risks and to support victims, survivors and businesses on strategies to address modern slavery.

### New Zealand

New Zealand has not introduced Modern Slavery Legislation to date.

A member’s bill was lodged by the New Zealand National Party in May 2025, which may result in Modern Slavery Legislation being back on the Parliamentary agenda.

Downer continues to monitor further legislative developments in Australia and New Zealand.

# Appendix

The controlled entities of the Group listed below were wholly owned during the current and prior year, unless otherwise stated:

## Australia

ACN 009 173 040 Pty Ltd	Downer Holdings Pty Limited
Aladdin Group Services Pty Limited	Downer Investments Holdings Pty Ltd
Aladdin Laundry Pty Limited	Downer Mining Regional NSW Pty Ltd
Aladdin Linen Supply Pty Limited	Downer PipeTech Pty Limited
Aladdins Holdings Pty. Limited	Downer PPP Investments Pty Ltd
ASPIC Infrastructure Pty Ltd	Downer Professional Services Pty Ltd
Asset Services (Aust) Pty Ltd	Downer QTMP Pty Ltd
Berkeley Challenge (Management) Pty Limited	Downer Utilities Australia Pty Ltd
Berkeley Challenge Pty Limited	Downer Utilities Holdings Australia Pty Ltd
Berkeley Railcar Services Pty Ltd	Downer Utilities New Zealand Pty Ltd
Berkeleys Franchise Services Pty Ltd	Downer Utilities SDR Pty Ltd
Bonnyrigg Management Pty. Limited	Downer Victoria PPP Maintenance Pty Ltd
Cleandomain Proprietary Limited	EDI Rail PPP Maintenance Pty Ltd
Cleanevent Australia Pty. Ltd.	EDICO Pty Ltd
Cleanevent Holdings Pty. Limited	Emoleum Partnership
Cleanevent International Pty. Limited	Emoleum Road Services Pty Ltd
Cleanevent Technology Pty Ltd	Emoleum Roads Group Pty Ltd
Concrete Pavement Recycling Pty Ltd	Envista Pty Limited
DM Roads Services Pty Ltd	Errolon Pty Ltd
DMH Electrical Services Pty Ltd	Evans Deakin Industries Pty Ltd
DMH Maintenance and Technology Services Pty Ltd	Fieldforce Services Pty Ltd
DMH Plant Services Pty Ltd	Fowlers Asphaltng Pty. Limited
Downer Australia Pty Ltd	Gippsland Asphalt Pty. Ltd.
Downer EDI Associated Investments Pty Ltd	Infrastructure Constructions Pty Ltd
Downer EDI Engineering Company Pty Limited	International Linen Service Pty Ltd
Downer EDI Engineering CWH Pty Limited	LNK Group Pty Ltd
Downer EDI Engineering Electrical Pty Ltd	Lowan (Management) Pty. Ltd.
Downer EDI Engineering Group Pty Limited	Maclab Services Pty Ltd
Downer EDI Engineering Holdings Pty Ltd	Mineral Technologies (Holdings) Pty Ltd
Downer EDI Engineering Power Pty Ltd	Mineral Technologies Pty Ltd
Downer EDI Engineering Pty Limited	Monteon Pty Ltd
Downer EDI Limited Tax Deferred Employee Share Plan	Nationwide Venue Management Pty Limited
Downer EDI Mining Pty Ltd	New South Wales Spray Seal Pty Ltd
Downer EDI Mining-Minerals Exploration Pty Ltd	Pacific Industrial Services BidCo Pty Ltd
Downer EDI Rail Pty Ltd	Pacific Industrial Services FinCo Pty Ltd
Downer EDI Services Pty Ltd	Primary Producers Improvers Pty. Ltd.
Downer EDI Works Pty Ltd	Rail Services Victoria Pty Ltd
Downer Energy Systems Pty Limited	Riley Shelley Services Pty Limited
Downer Group Finance Pty Limited	Roche Services Pty Ltd

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## Australia - continued

RPC Roads Pty Ltd	Spotless Property Cleaning Services Pty Ltd
RPQ Asphalt Pty. Ltd.	Spotless Securities Plan Pty Ltd
RPQ Mackay Pty Ltd	Spotless Services Australia Limited
RPQ North Coast Pty. Ltd.	Spotless Services International Pty Ltd
RPQ Pty Ltd	Spotless Services Limited
RPQ Services Pty. Ltd.	Spotless Treasury Pty Limited
RPQ Spray Seal Pty. Ltd.	SSL Asset Services (Management) Pty Ltd
Skilltech Consulting Services Pty. Ltd.	SSL Facilities Management Real Estate Services Pty Ltd
Skilltech Metering Solutions Pty Ltd	SSL Security Services Pty Ltd
Smarter Contracting Pty Ltd	Tarmac Linemarking Pty Ltd
Southern Asphalters Pty Ltd	Taylor's Two Two Seven Pty Ltd
Sports Venue Services Pty Ltd	Trenchless Group Pty Ltd
Spotless Defence Services Pty Ltd	Trico Asphalt Pty. Ltd.
Spotless Facility Services Pty Ltd	UAM Pty Ltd
Spotless Financing Pty Limited	Utility Services Group Holdings Pty Ltd
Spotless Group Holdings Limited	Utility Services Group Limited
Spotless Group Limited	VEC Civil Engineering Pty Ltd
Spotless Investment Holdings Pty Ltd	VEC Plant & Equipment Pty Ltd
Spotless Management Services Pty Ltd	

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## New Zealand and Pacific

DGL Investments Limited	Hawkins Limited
Downer Construction (Fiji) Pte Limited	Hawkins Projects 1 Limited
Downer Construction (New Zealand) Limited	ITS Pipetech Pacific (Fiji) Pte Limited
Downer EDI Engineering PNG Limited	Richter Drilling (PNG) Limited
Downer EDI Engineering Power Limited	Spotless Facility Services (NZ) Limited
Downer EDI Works Vanuatu Limited	Spotless Holdings (NZ) Limited
Downer New Zealand Limited	Techtel Training & Development Limited <sup>(iii)</sup>
Downer New Zealand Projects 1 Limited	The Roothing Company Limited <sup>(iii)</sup>
Downer New Zealand Projects 2 Limited	Waste Solutions Limited <sup>(ii)</sup>
Downer Utilities New Zealand Limited	Works Finance (NZ) Limited
Green Vision Recycling Limited	

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## Africa

Downer EDI Mining - Ghana Limited<sup>(iii)</sup>  
MD Mineral Technologies Africa (Pty) Ltd  
MD Mining and Mineral Services (Pty) Ltd<sup>(i)</sup>

## Americas

Mineral Technologies Comercio de Equipamentos para  
Processamento de Minerais LTDA  
Mineral Technologies, Inc.  
Mineral Technologies Inc.

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## Asia

Changchun Ao Hua Technical Consulting Co Ltd  
Cleanevent Middle East FZ-LLC<sup>(iii)</sup>  
Downer EDI Engineering (S) Pte. Ltd.  
Downer EDI Engineering Holdings (Thailand) Limited  
Downer EDI Engineering (Thailand) Ltd  
Downer EDI Group Insurance Pte. Ltd.  
Downer EDI Rail (Hong Kong) Limited<sup>(ii)</sup>  
Downer EDI Works (Hong Kong) Limited<sup>(ii)</sup>  
Downer Pte. Ltd.  
Downer Singapore Pte. Ltd.  
MD Mineral Technologies Private Limited  
PT Duffill Watts Indonesia<sup>(iii)</sup>

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## United Kingdom and Channel Islands

KHSA Limited

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(i) 70% ownership interest.

(ii) Entity is currently undergoing liquidation/dissolution.

(iii) Entity dissolved/de-registered during the financial year ended 30 June 2025.



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