space frame®

DESIGN + CONSTRUCT SOLUTIONS



MODERN SLAVERY STATEMENT

FINANCIAL YEAR 2025/2026

INTRODUCTION

This Statement is submitted on behalf of Spaceframe Buildings Pty Ltd (ABN 42 009 930 554) (Spaceframe) under section 13 of the Modern Slavery Act 2018 (Cth) (MSA) to cover the reporting period of 1 July 2025 to 30 June 2026.

Modern slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom. It includes exploitation including human trafficking, slavery, servitude, forced labour, forced marriage, debt bondage, child labour and deceptive recruiting. It also includes actions of other parties who are involved in supporting financial or commercial transactions or contributing to any business or undertaking involving servitude and slavery.

This Statement affirms our commitment to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations. It is consistent with our ethical framework, which expects a culture of high ethical standards, including compliance with applicable laws, contractual and other obligations.

MANDATORY CRITERIA (A & B)

BUSINESS STRUCTURE

Spaceframe is a family owned, limited liability building company specialising in design and construction of industrial and commercial developments and cold storage facilities. Spaceframe has offices in Brisbane and delivers projects throughout Australia. Design of all buildings is done in-house with specialised draftspersons and engineers.

Spaceframe then engages trade specialist subcontractors to supply and install all aspects of each construction.

Spaceframe owns and controls one subsidiary: Scantec Refrigeration Technologies Pty Ltd (ABN 76 073 109 065) (Scantec). Scantec provides industrial refrigeration and environmental control solutions. Scantec do not meet the reporting threshold under the MSA.

Spaceframe is owned by the Raspotnik Family Discretionary Trust and the Werner Raspotnik Family Trust. Neither of these entities is a reporting entity under the MSA.

APPLICABLE LAW

This Statement supports the intent of international conventions, treaties, and protocols relevant to combating modern slavery and the MSA.



OPERATIONS

Spaceframe recognised that all organisations face risks of modern slavery within their operations and supply chains, particularly in higher-risk industries like construction.

As a design and construction business, we acknowledge that it is our responsibility to identify, assess and address these risks.

Key risks in construction include:

- Use of raw materials linked to higher modern slavery risks.
- Heavy reliance on subcontractors and overseas outsourcing, which reduces oversight.
- Dependence on manual labour, often undertaken by visa holders, lower-skilled or transient workers who are more vulnerable to exploitation.
- Industry pressures such as cost-driven contracts and tight deadlines, which can result in forced overtime, wage underpayment, and insecure employment.

Within its own workforce, Spaceframe directly employs 49 staff (four casuals, none tied to visas) and its subsidiary, Scantec, employs 52 staff (two casual and one under the Subclass 186 Visa)). This structure reduces the risk of modern slavery within direct operations.

However, risks remain through the use of subcontractors and recruitment agencies. Spaceframe acknowledges that recruitment agencies, if not properly managed, may limit oversight of the employment process and increase exposure to modern slavery risks.

The below graphic represents the geographical regions of our operations. For the context of modern slavery, this map, and the supply chain maps that follow, have been overlaid with the colour tier system of the Trafficking-in Persons Report.







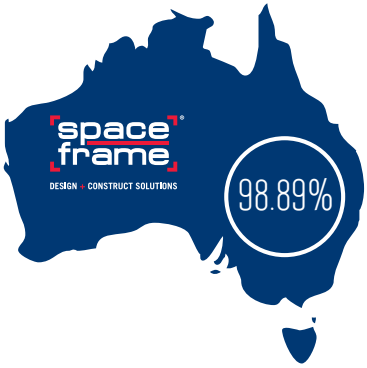


SUPPLY CHAIN

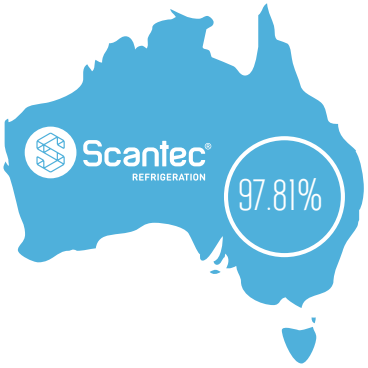
Spaceframe recognises that businesses can be linked to modern slavery through their supply chains, particularly where budget and time pressures are imposed on suppliers.

In the most recent reporting period, Spaceframe engaged 539 Tier 1 suppliers (down from 613 from our prior reporting period. While this is a medium-sized supply base, it requires significant oversight to manage modern slavery risks. Of these suppliers, 98.89% were based in Australia, with only six overseas (three in the UK, one in Vietnam, and two in China).

For Scantec, a related entity, the supply base comprised 366 Tier 1 suppliers (97.81% in Australia), with the remainder located in countries including England, China, Thailand, Denmark, Turkey, Sweden and Malaysia. This medium-sized supply base requires ongoing monitoring and resource investment to manage and mitigate modern slavery risks. The previous reporting period included 318 direct or Tier 1 suppliers.



United Kingdom
Vietnam
China



United Kingdom
Sweden
Turkey
Denmark
Malaysia
China
Thailand

To support oversight and reduce risks:

Transparency
Spaceframe publishes its Modern Slavery Statement on its website for suppliers and subcontractors to access.

Annual Reviews
Directors and Senior Management review these lists annually, assessing higher-spend suppliers before awarding contracts. Criteria include modern slavery risks, financial capacity, environmental and safety records, quality, costs, and reliability.

Preferred Supplier System
A maintained list of preferred suppliers and subcontractors creates more stable, recurrent engagements, reducing uncertainty for workers.

Risk Assessments
Annual assessments are conducted to identify potential modern slavery risks in operations and supply chains. For FY24–25 and FY25–26, the outcome was that slavery was unlikely or unknown within suppliers/subcontractors. Risk-based measures have been implemented to stay within the Board's risk appetite.

Spaceframe now includes its modern slavery statement with all tenders and engages subcontractors and suppliers via the software. The company has mapped all supplier locations, both nationally and internationally, and will require suppliers to attest to compliance, sign relevant agreements, and report any modern slavery concerns. Remedial actions will be taken where issues are identified.

Spaceframe has begun implementing specialised modern slavery risk identification software to strengthen its approach to addressing modern slavery in its supply chains. During the 2025/2026 reporting period, four key subcontractor and suppliers (representing over 61.46% of purchases) were assessed through third-party Modern Slavery Insights report that evaluates risk based on geography, industry, and workforces.

Supply chain mapping revealed a broad range of supplier categories, with higher risks identified in areas such as subcontracted trades, labour hire, building materials, catering, cleaning, furniture, and IT.

SUPPLY CHAIN - SCANTEC

Scantec's suppliers operate across a wide range of industries and locations, including Australia, with some based in countries identified as higher risk for modern slavery - such as Thailand, Malaysia, Turkey, and China. Our supply chain covers goods and services including building and electrical services, air conditioning, equipment hire, recruitment, building materials, cleaning, IT, transport, and marketing.

According to industry research, higher-risk categories for modern slavery include subcontracted building services, air-conditioning, chemical supply, equipment hire, recruitment and labour hire, building materials, cleaning, courier and postage, and IT hardware and software.

Scantec's suppliers span multiple sectors, including construction, manufacturing, professional and scientific services, transport, waste management, retail, accommodation, and support services.



HIGH RISK OPERATIONS

Our suppliers operate, produce, and source across several/ different sectors. Some of these sectors can be described as high-risk. High-risk sectors are those in which human trafficking activities are known to occur and were identified in the Global Estimates of Modern Slavery and child labour exploitation that were separately identified in Child Labour: Global Estimates 2020 Trends and the Road Forward (ILO and UNICEF, 2021).

The below graphics show the high-risk sectors of operation, production, and sourcing for our suppliers. The numbers in the following graphics describe how many suppliers are in the corresponding sectors.

High Risk Activities	Construction	Domestic Work	Building Services	Wholesale	Retail	Manufacturing	Vehicle Maintenance & Repair	Transportation & Storage	Accommodation & Food Service
Sectors of Operations	8	1	-	-	-	-	-	-	-
Production of Goods	7	1	2	-	-	-	-	-	-
Sourcing Goods	7	1	1	1	1	2	2	1	1

Some countries or regions where our suppliers operate, as well as some goods produced and sourced by our suppliers, can be described as high-risk due to the possibility of a link to modern slavery practices such as Forced Labour, Human Trafficking, Child Labour, and Debt Bondage.

MANDATORY CRITERIA (C)

Modern Slavery practices in Spaceframe Buildings Pty Ltd, the operations and supply chains

Modern slavery refers to various forms of exploitation and coercive practices that deprive individuals of their freedom, rights, and dignity. It encompasses situations where individuals are forced or coerced into labour, servitude, or human trafficking against their will. Modern slavery can take different forms, including forced labour, debt bondage, forced marriage, human trafficking, and child labour.

The International Labor Organisation estimates that over 50 million people around the world are victims of modern slavery. In recent years, supply chain transparency is a key policy strategy used by governments to identify and prevent business practices that lead to modern slavery.



OUR COMMITMENT

Slavery, including any situations of exploitation where a person cannot refuse or leave work because of threats, violence, coercion, abuse of power, or deception, and human trafficking, is abhorrent and Spaceframe is committed to ensuring that it is absent from Spaceframe's operations and its supply chain.

Spaceframe's respect for human rights refers to internationally recognised human rights – understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. To demonstrate this commitment in relation to modern slavery, Spaceframe shall:

- seek to identify and risk mitigate any adverse human rights impacts that Spaceframe may cause or contribute to through its own business activities, or which may be directly linked to its operations by its business relationships;
- avoid causing or contributing to adverse human rights impacts through its own business activities and address such impacts when they occur;
- seek to prevent, or mitigate, adverse human rights impacts that are directly linked to Spaceframe's design and construction operations and by its business relationships, even if Spaceframe many not have knowingly contributed to those adverse impacts;
- exercise a due diligence process to identify, prevent, migrate, and account for how Spaceframe addresses possible impacts on modern slavery and human rights; and
- excercise management system processes to enable the remediation of any adverse human rights impacts to which Spaceframe, or its subcontractors and suppliers, may contribute.

SUPPLIERS & SUBCONTRACTORS

Within our precedent Purchase Order Terms and Conditions and Subcontractor Agreements we have requested various warranties from our suppliers and subcontractors in relation to their own modern slavery approach. The warranties sought from suppliers and subcontractors include that they have not engaged in, and do not engage in any conduct that would constitute a modern slavery offence under any law (including the MSA) or otherwise contravene any laws or codes of practice in force in relation to modern slavery.

We also seek to obtain a warranty from our suppliers and subcontractors to the effect that they will comply with any mandatory reporting obligations in relation to modern slavery. Acknowledging that our supply chain and subcontracting chain extends beyond the tier 1 level, we seek from our suppliers and subcontractors a warranty that they will take reasonable steps to ensure any secondary subcontractor or supplier complies with mandatory reporting obligations in relation to modern slavery as well.



STATEMENT OF RISK APPETITE

Spaceframe has a zero-tolerance approach to slavery in all its forms. This means that Spaceframe has no appetite for causing harm to persons, damaging its reputation, being subject of legal action or incurring financial loss or standing in the business community arising from a failure to comply with the MSA.

Spaceframe's policies, management system processes, procedures, controls, and risk mitigation strategies are designed to reduce the risk and the prevalence of modern slavery.

ETHICAL INVESTMENTS

Our business seeks to ensure that no investment should knowingly be made in companies who engage in activities or services which could be directly viewed as compromising the intent of this Statement.



MANDATORY CRITERIA (D)

The actions taken by Spaceframe Buildings Pty Ltd to assess and address those risks, including due diligence and remediation process.

ASSESS



Spaceframe Buildings Pty Ltd uses a third-party tool, the iPRO Modern Slavery Assessment Tool to assess modern slavery risks in our operations and supply chain.

The risks identified in the previous section were all identified utilising this assessment tool. We engaged iPRO during the reporting period to conduct the assessments on our operations, and a bulk assessment of eight of our suppliers. We intend to carry this process forward as an annual assessment of our operations and supply chain.

Participating suppliers were asked to complete a self-assessment questionnaire online. After each supplier completed and submitted the questionnaire, their responses were assessed to determine their modern slavery risk scores and associated risk category.

Each supplier that completed the assessment was assigned a traffic light category.

To determine the appropriate risk category, responses were first evaluated for risks inherent to a supplier's operations, production, and sourcing. This is referred to as the Inherent Risk Score. The Inherent Risk Score was calculated based on the geographical, type of goods, industry sector, and workforce parameters that the supplier indicated in the Modern Slavery Assessment Tool (MSAT).

Next, the Unmitigated Risk Score was evaluated. This score was calculated based on the policy and procedure responses on the questionnaire. A supplier's Unmitigated Risk Score determined whether they were categorised as having inadequate, partial, or adequate risk control.

Then, the risk scores for each assessed supplier were aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the overall supply chain.

HIGH **High Levels of Inherent Risk**

HIGH **Inadequate Risk Control**

MEDIUM **Partial Risk Control**

LOW **Adequate Risk Control**
Low Levels of Inherent Risk

REPORT



A key aspect of our modern slavery approach is enabling our workers and suppliers to feel free and safe to speak up when there are reasonable grounds to suspect that our business or related persons are not acting ethically or in accordance with laws and obligations. This is enshrined within our Whistleblower Policy and Procedures.

In Australia, the Australian Federal Police are responsible for investigating suspected cases of modern slavery and can be contacted on 131 444 to discuss or report a suspected case. Contact can be made anonymously.

OPERATIONS



Persons employed by Spaceframe have a formal contract of employment, which reduces the vulnerability of those workers to exploitation.

Spaceframe seeks references for all prospective employees who are recruited through agencies to ensure we have visibility over the process and relationships involved. Our recruitment agencies are also subject to various contractual obligations which provide Spaceframe with a degree of oversight over these arrangements.

Spaceframe stipulates modern slavery and human rights expectations to staff, business partners and other parties directly linked to Spaceframe's operations. We have several policies in place that help create a culture that upholds the health and safety of our staff and prevents exploitation or practices that may lead to exploitation including our:

- Discrimination, Harassment, Inclusion, Fair Labour and Protection of Workers Policy;
- Anti-Bribery Policy;
- Aboriginal and Torres Strait Islanders – Respect and Engagement Policy;
- Privacy Policy;
- Health, Safety, Environment and Quality Policy;
- Workplace Rehabilitation Policy; and
- Environmental Social Governance (ESG) Policy.

Spaceframe provides annual training for staff on modern slavery risks and impacts. This raises awareness with our staff and plays a key role in fortifying our due diligence approach. Given the recurrent nature of this training, we expect that as time passes it will provide us with an insight into the effectiveness of the actions we are taking in this space as we observe staff engagement and field various queries from our workforce.

Spaceframe, in our annual Management Review meeting undertakes a review of quality, safety and conformance to all policies and procedures including any improvements that require attention. We will formally review performance against this Statement annually in this meeting, with the intention to continually improve the effectiveness of the systems used to identify, assess and address the risks of modern slavery within our operations and supply chain.

Spaceframe ensures that this Modern Slavery Statement is available and communicated internally and externally to all personnel, business partners and other relevant parties and is reflected in operational policies and procedures necessary to embed it throughout the business.

Spaceframe Buildings also completed a self-assessment using the same process to determine a risk category for our operations.

Additionally, we conduct due diligence relating to modern slavery risks by utilising the iPRO Modern Slavery Assessment Tool as part of our new supplier procurement process.

As part of a new suppliers onboarding, they will complete the modern slavery assessment in addition to our other quality and compliance checks.

ADDRESS



Suppliers that completed the self-assessment were given action items to complete post-assessment. The action items provided to each supplier were based on their responses to the questionnaire, and if implemented, will reduce the unmitigated risks identified during the assessment. Action items were also aggregated, giving Spaceframe Buildings Pty Ltd a focused view of the most impactful actions that could be taken by suppliers across the supply chain.

We have started rolling out a supplier follow-up initiative to further discuss the action items and address the risks identified through the assessment. Primarily this involves ensuring that suppliers have the right policies and procedures in place to mitigate inherent risks in their business.

Some of the policies we are focusing on include:

- Equal Opportunity & Non-Discrimination Policy
- Document Checks Policy
- Wage Compliance Policy
- Child Labour Policy

Other ways we are addressing modern slavery risks include further consideration of implementing a self-assessment modern slavery tool for all new suppliers. Additionally, we have rolled out a Modern Slavery Training module, through a third party provider, iPRO, to the eight suppliers who participated in our Modern Slavery Assessment.

MANDATORY CRITERIA (E)

Describe how Spaceframe Buildings Pty Ltd assess the effectiveness of the actions being taken to assess and address the modern slavery practices in its operations and supply chain.

ASSESS

We utilise the benchmarking and KPI's in the iPRO Modern Slavery Assessment Tool to assess the effectiveness of our actions. The main KPI's we are using to benchmark our efforts are the risk scores that are generated as part of the assessment process.

The Inherent Risk Score measures modern slavery risks that are intrinsic/built-in to the operations of an organisation. This is determined by asking which countries, regions, sectors, and high-risk goods are part of their operations, production, or supply chain.

The Unmitigated Risk Score measures the organisations risk that is still present (remains) after accounting for modern slavery risk controls that have been implemented. This is determined by asking suppliers about the policies, processes, and procedures in place to reduce modern slavery risks.

Spaceframe Buildings Pty Ltd is provided an aggregated risk score of all the assessed suppliers, and we use this aggregated score to measure the risk on an overall supply chain level.

We aim to continuously improve on these KPI's.

As we take actions within our organisation, and with our suppliers, we will be able to assess the effectiveness of our modern slavery action plan to reduce the Unmitigated Risk Score by introducing relevant policies and procedures.

We also measure the effectiveness of our engagement with suppliers and will continue to encourage participation in our assessment programme to better identify and mitigate modern slavery risks in our supply chain.

iPRO Modern Slavery Assessment Tool

- ✓ Inherent Risk Score
- ✓ Unmitigated Risk Score

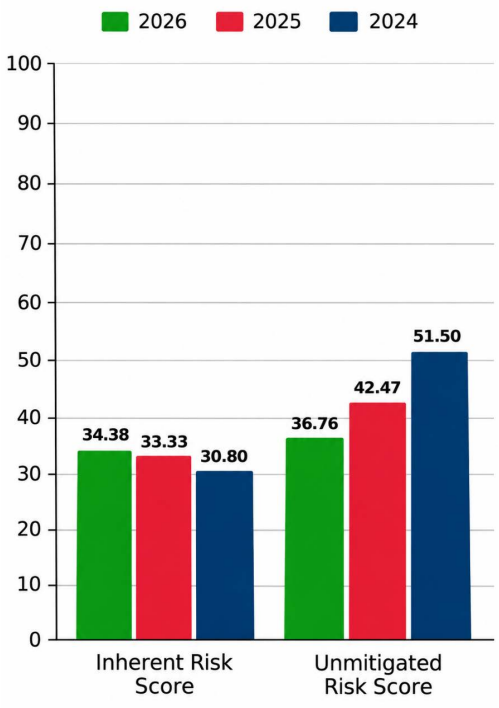
KPI's

Spaceframe utilises iPro's Modern Slavery Assessment Tool for benchmarking and KPI referencing to assess the effectiveness of our actions.

The following Inherent Risk Scores and Unmitigated Scores are an aggregated benchmark for the overall modern slavery risk in our supply chain. Our 2026 results, noted in green are shown against our 2025 results in red.

Of the suppliers approached - 8 in total - 100% completed our Modern Slavery Assessment.

The results shows a slight increase in inherent risk however a significant decrease in unmitigated risk for this calendar year.



MANDATORY CRITERIA (F)

SCANTEC REFRIGERATION

As stated above, Spaceframe owns and controls Scantec. Scantec does not meet the reporting threshold.

One of the Spaceframe Directors also sits on the Board of Scantec. This enables close consultation between the entities to occur quite naturally whenever required.

In relation to Modern Slavery, Spaceframe is still in the process of understanding how the risks identified in its own operations and supply chains may equally apply to Scantec and what further action may need to be taken specifically in relation to Scantec. We will endeavour to gain further insight into these aspects in future reporting periods.



APPROVAL

The Board of Directors, being the principal governing body of Spaceframe Buildings Pty Ltd, constituted by Jane Raspotnik, Peter Raspotnik, Werner Raspotnik and Lisel Pringle, have formally approved this Modern Slavery Statement by a meeting of the board of directors, on 30 October 2026.



Jane Raspotnik - Director



better everything

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