



# Modern Slavery Statement

**Company:** Flowtint PNG Pty Ltd

**Financial Year Ending:** 30 June 2025

**Date of Approval:** 29 April 2026

## 1. Introduction and Commitment

Flowtint PNG Pty Ltd ("Flowtint PNG") is committed to operating with the highest standards of ethics, integrity, and human rights. As a premier healthcare turnkey building and project management firm in Papua New Guinea, we recognise our responsibility to ensure that our operations and supply chains are free from modern slavery, human trafficking, forced labour, and child labour. We fully support the principles outlined in the UN Global Compact and align our reporting with the Australian Modern Slavery Act 2018.

## 2. Our Structure, Operations, and Supply Chain

**Structure and Operations:** Flowtint PNG Pty Ltd is a privately held project management and construction firm headquartered in Port Moresby, Papua New Guinea. We specialise in the end-to-end design, procurement, construction, and commissioning of critical healthcare infrastructure, including hospitals, regional clinics, and specialised medical facilities.

**Our Supply Chain:** Our supply chain is complex and spans both domestic and international borders. It includes:

- **Direct Subcontractors:** Local and international engineering, electrical, plumbing, and heavy construction contractors.
- **Material Procurement:** Sourcing of raw construction materials (steel, timber, cement) and highly specialised medical fit-out materials (HVAC systems, modular theaters, and clinical surfaces) from suppliers in PNG, Australia, and the broader Asia-Pacific region.
- **Logistics:** Freight, shipping, and land transport operators navigating PNG's unique geography.
- **Professional Services:** Architectural, legal, and environmental consulting services.

## 3. Identifying the Risks of Modern Slavery

Given the nature of the global construction industry and our geographical operating environment, we acknowledge that modern slavery risks exist within our broader supply chain. We have identified the highest risk areas to be:

- **Tier 2 and Tier 3 Manufacturing:** The sourcing of raw building materials (such as timber, masonry, and structural steel) and the manufacturing of medical electronics in regions with historically lower labour protections.
- **Subcontracted and Migrant Labour:** The use of unskilled or semi-skilled transient labour by our secondary contractors on remote construction sites within PNG.
- **Logistics and Freight:** The potential for exploitation of workers in maritime shipping and local land transportation.



## 4. Actions Taken to Assess and Address Risks

Flowtint PNG has implemented a robust framework to mitigate these risks and ensure human dignity remains at the core of our infrastructure projects:

- **Supplier Code of Conduct:** All Tier-1 suppliers and direct subcontractors are contractually obligated to sign and adhere to our Supplier Code of Conduct, which strictly prohibits any form of forced labour, debt bondage, or child labour.
- **Due Diligence and Screening:** Before awarding contracts, Flowtint PNG conducts strict due diligence on new vendors. This includes requiring evidence of their own labour policies and fair wage practices under the Papua New Guinea Employment Act.
- **Site Audits and Inspections:** Our Project Management teams conduct unannounced health, safety, and welfare audits on all Flowtint PNG construction sites to ensure workers are provided with safe conditions, proper safety gear, and uncoerced working environments.
- **Grievance Mechanisms:** We have established an accessible, confidential grievance reporting channel for all site workers and subcontractor employees to report unsafe conditions, withheld wages, or unethical practices without fear of retaliation.

## 5. Assessing the Effectiveness of Our Actions

We are committed to continuous improvement. To measure the effectiveness of our anti-slavery initiatives, Flowtint PNG tracks the following Key Performance Indicators (KPIs):

- The percentage of Tier-1 suppliers who have formally signed our Supplier Code of Conduct (Target: 100%).
- The number of site audits conducted per quarter focusing specifically on worker welfare and labour compliance.
- The number of grievances reported via our whistle-blower channels and the average resolution time.
- Annual reviews of our procurement policies by our executive board to adapt to emerging global supply chain risks.

## 6. Training and Capacity Building

We believe that awareness is the first step toward eradication. Flowtint PNG provides mandatory training for our procurement officers, project managers, and site supervisors. This training focuses on how to spot the "red flags" of modern slavery in contractor recruitment and how to ethically intervene.