

Macmahon Group Privacy Policy

About this Policy

Macmahon recognises and respects your privacy. Macmahon is committed to complying with, and is bound by, the Australian Privacy Principles (APPs) under the *Privacy Act 1988* (Cth), as amended, and similar legislation governing privacy and personal information in other jurisdictions. This Privacy Policy details how we collect, hold, use and disclose personal information provided to Macmahon.

In this policy:

- 'Personal information' means information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not.
- 'Macmahon', 'we' and 'us' means Macmahon Holdings Limited and its related bodies corporate, subsidiaries and controlled entities, including any entity identified in a jurisdiction-specific schedule to this Policy. 'Employee' includes potential future employees and job applicants, current employees, and previous employees, as well as contractors and subcontractors.

The security of your personal information is important to us, and we take all reasonable precautions to safeguard it from loss, misuse, interference, unauthorised access, modification, or disclosure. Although Macmahon encourages the use of encrypted email, email is generally not a secure means of communication. You should consider this when sending personal information to us by email.

Application of schedules

Macmahon operates in multiple jurisdictions. Personal information may be collected, held, used or disclosed in connection with activities undertaken in Australia, New Zealand and other jurisdictions in which the Macmahon Group operates.

Macmahon may issue jurisdiction-specific schedules to this Privacy Policy from time to time. Where a schedule applies to the collection, holding, use or disclosure of personal information in a particular jurisdiction, that schedule forms part of this Policy. In the event of any inconsistency between a schedule and this Policy, the schedule prevails to the extent of the inconsistency.

The kinds of personal information we collect

We collect personal information including:

- Employment applications and supporting documents;
- Licences and permits;
- Employment agreements, and other records relating to terms and conditions of employment;
- Contact details for the employee, their nominated next of kin or emergency contact, and any referees;
- Identification documents;

- Any information supplied by employees and their immediate family members in declarations of any potential conflicts of interest;
- Details of citizenship and visa status;
- Copies of academic qualifications and training records;
- Records relating to remuneration and benefits;
- Medical certificates or health-related information, supplied by an employee or their medical practitioner or nominated third party medical assessment practitioner;
- Continuous or intermittent surveillance materials including, but not limited to, CCTV camera footage and the output from computer and tracking surveillance of our sites, offices, assets and business systems to monitor the correct and appropriate use of company property and resources as part of our safety and security commitment to our employees and stakeholders;
- Driver Safety System (DSS) or equivalent technology for the purpose of alerting operators of certain heavy machinery and any other vehicles when fatigue or distraction is identified, and in some circumstances recording audio and video immediately surrounding an incident;
- Biometric data collected using computer-based systems that scan a person's face, hand, finger, iris, signature, or other physical characteristic. The information collected is encrypted in mathematical algorithms and cannot be used to recreate your physical characteristics for other purposes;
- Banking and taxation details (for the calculation and payment of salary, wages, and associated taxes);
- Superannuation contributions;
- Information regarding an employee's performance and any performance management plans; and
- Any other records that employers are required to keep of their employees in accordance with the *Fair Work Act 2009* (Cth) and the *Fair Work Regulations 2009* (Cth).

We will keep copies of any information or emails you send or provide to us if we believe that we have a legal requirement to do so. The content of your emails may be monitored for quality control, systems administration, and legal compliance purposes.

If, on our website, you request to receive information from Macmahon, we will keep a record of your email address, and any other information you provide, for the purposes for which you provide that information.

How we collect personal information

In general, we collect personal information about you when you supply it to us. We also collect personal information from third parties including the results of employment related medical assessments, training records and academic qualifications, character assessments from referees, and information regarding the validity of any licences and permits.

When visiting our website (www.macmahon.com.au), Macmahon keeps a record of your visit. The following information may be collected for statistical purposes and may be used by Macmahon to help improve the website:

- Your Internet Protocol (IP) address;
- The previous site you visited;
- Your type of browser and operating system used;
- The pages you access and the documents you download.

Macmahon will not attempt to identify users or their browsing activities; however, governmental agencies may be entitled to inspect such records in the event of an investigation. Our website uses tracking technologies called "cookies" to monitor the pages accessed by browsers on our website. Cookies are small text files which are stored in memory or on your hard drive for record keeping purposes and are used to help us enhance this website. You may set your browser to refuse cookies if you wish.

How we use personal information

In general, we will only use or disclose your personal information for the purposes for which you have disclosed it to us. We will also disclose some of your personal information for the purposes of validating and verifying such information, including (but not limited to) checking that permits, qualifications, and licence documents are valid and current.

We may also use or disclose your personal information where this is necessary to lessen or prevent a serious threat to life, health or safety, or it is required or authorised by law.

For the purposes of delivering our services and the operation of the business, we may disclose your personal information to:

- Other employees, contractors, sub-contractors, suppliers, service providers, business partners, clients and potential clients, including those of our subsidiaries and related entities;
- Professional service providers such as accountants, advisors, auditors, consultants, insurance brokers, and lawyers;
- Dispute resolution providers, courts and associated bodies; and
- Shareholder registers.

Access to your personal information

You may request access to any of the personal information we hold about you. In most cases, a summary of your personal information will be freely available to you by contacting our Company Secretary (details below). For more detailed requests for access to personal information (for example, access to information held in archives), a fee may be charged to cover the cost of retrieval and the supply of this information to you.

All requests for access to personal information will be handled as quickly as possible and we will endeavour to process any request for access within 30 days after receiving it. Some requests for access may take longer than 30 days to process depending upon the nature of the personal information being sought.

Please note that we are not always required to provide you with access to your personal information on request. We may refuse you access to personal information in some circumstances, such as where giving access would have an unreasonable impact on the privacy of other people; where denying access is required or authorised by law; or where the request for access is regarded as frivolous or vexatious. If we deny your request for access to your personal information, we will explain why.

Correction of your personal information

You may request that we correct any of the personal information which we hold about you, to ensure that having regard to the purpose for which we hold it, the information is accurate, up to date, complete, relevant and not misleading. If we refuse your request, we will tell you in writing why we have done so, as well as the mechanisms which are available to you to complain about our refusal and anything else of which we are required to inform you.

Privacy incidents and breaches

Macmahon maintains processes for identifying, assessing and responding to suspected privacy incidents and data breaches. Where a privacy breach occurs, Macmahon will assess its obligations under applicable privacy laws and notify regulators and affected individuals where required by law.

Complaints

If you believe that Macmahon has not protected your personal information as set out in this Privacy Policy or has breached your privacy in any way, you may lodge a complaint with us by contacting our Company Secretary by emailing cosec@macmahon.com.au. We will promptly provide written acknowledgment of receipt of the complaint, investigate it (and let you know if we require any further information from you in

order to do so) and will endeavour to provide a substantive written response to the complaint within 30 days. If you are not satisfied with the response to your request for access or correction, or to your complaint, you can contact the Office of the Australian Information Commissioner:

by telephoning 1300 363 992 (or +61 2 9284 9749 if calling from outside Australia);
by fax to +61 2 9284 9666;
by emailing enquiries@oaic.gov.au (mailto:enquiries@oaic.gov.au);
or by writing to:

Director of Compliance
Office of the Australian Information Commissioner
GPO Box 5218
Sydney, New South Wales 2001

Disclosure to overseas recipients

We may disclose some personal information to overseas recipients for the purpose of processing, validating, or verifying that information. We currently have such services performed primarily in Indonesia, the Philippines and India. We may make disclosures of personal information to overseas recipients if we are required to do so by law.

Before doing so, we will endeavour to take reasonable steps to ensure that the overseas recipient does not breach the relevant APPs in relation to the information. Alternatively, we will: (a) be reasonably satisfied that the recipient is subject to a law or binding scheme that protects the information in a way that, overall, is at least substantially similar to the protection afforded by the APPs, and that mechanisms are available to enforce that protection; or (b) be satisfied that the disclosure would not otherwise breach the APPs.

Acceptance of and changes to this Privacy Policy

You accept that providing personal information to us indicates your acceptance of the contents of this Privacy Policy, our Privacy Statement, and our disclaimer (refer to www.macmahon.com.au). Please note that the contents of this Privacy Policy may be updated from time to time. You should regularly check this Privacy Policy, the Privacy Statement, and the disclaimer to ensure that you have the latest versions.

This Privacy Policy was last updated on 10 September 2026.
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**SCHEDULE 1
NEW ZEALAND**

Schedule to G-1136 Privacy Policy

Document reference	G-1136 - Schedule 1
Effective date	04 September 2026
Policy owner	Company Secretary
Applies to	Macmahon New Zealand Limited and New Zealand operations

Purpose and status of this Schedule

This Schedule forms part of G-1136 Privacy Policy (Policy). It applies where Macmahon collects, holds, uses or discloses personal information in connection with its New Zealand operations. It supplements and modifies the Policy to ensure that those activities are addressed under the Privacy Act 2020 (New Zealand), as amended, and any applicable code of practice.

If there is any inconsistency between this Schedule and the Policy in relation to personal information covered by this Schedule, this Schedule prevails to the extent of the inconsistency. The Policy otherwise continues to apply.

New Zealand entity and definitions

For this Schedule, “Macmahon”, “we”, “our” and “us” include Macmahon New Zealand Limited and any related Macmahon entity that collects, holds or processes personal information in connection with Macmahon’s New Zealand operations.

“Personal information” means information about an identifiable individual. References in the Policy to the Australian Privacy Principles or the *Privacy Act 1988* (Cth) are, for the purposes of this Schedule, to be read as including the information privacy principles and the Privacy Act 2020, as applicable.

Scope

This Schedule applies to personal information about employees, prospective employees, former employees, contractors, subcontractors, client and supplier personnel, site visitors and other individuals dealing with Macmahon’s New Zealand operations.

Personal information collected

In addition to the categories described in the Policy, Macmahon may collect the following personal information for its New Zealand operations:

- KiwiSaver information.

Purposes of collection, use and disclosure

Macmahon may handle personal information for the purposes stated in the Policy and for purposes connected with its New Zealand operations, including:

- recruitment, engagement, employment and contractor administration;
- payroll, taxation, KiwiSaver, benefits, travel and accommodation;
- verifying identity, qualifications, licences, permits and work entitlements;
- health and safety, fitness for work, rehabilitation, emergency response and incident management;
- site, asset, information, network and operational security;
- providing mining, civil, maintenance and related services and administering projects and contracts;
- fraud prevention, investigations, dispute resolution, insurance and legal claims; and
- compliance with legal, regulatory and contractual obligations.

Macmahon will not use or disclose personal information for another purpose unless the further use or disclosure is authorised by the individual or permitted by law.

Collection notices

When collecting personal information directly from an individual, Macmahon will take reasonable steps to ensure that the individual is aware of the matters required by Information Privacy Principle 3, including:

- what information is being collected and why;

- who will receive and hold the information;
- whether supply is voluntary or mandatory and, if mandatory, the legal authority for collection;
- the consequences of not providing the information; and
- the individual's rights to request access to and correction of the information.

Macmahon may provide this information through the Policy, this Schedule, a specific collection notice, a form, contract, website notice, system notice, workplace signage or another appropriate communication. Specific notices will be used where the circumstances, sensitivity or technology require more tailored information.

Indirect collection

Where Macmahon collects personal information from someone other than the individual concerned, Macmahon will take reasonable steps to notify the individual in accordance with Information Privacy Principle 3A, unless an exception applies. Notification will be given before collection or, if that is not practicable, as soon as reasonably practicable afterwards.

Indirect sources may include referees, recruitment and labour-hire providers, clients, contractors, medical and occupational health providers, training and licensing bodies, government agencies, related Macmahon entities and publicly available sources.

Storage and security

Macmahon will take reasonable safeguards against loss, unauthorised access, use, modification, disclosure or other misuse of personal information. Safeguards may include access controls, authentication, encryption, secure transfer methods, monitoring and logging, physical controls, employee training, confidentiality obligations, contractual controls and incident-response processes.

Accuracy, retention and disposal

Before using or disclosing personal information, Macmahon will take reasonable steps, having regard to the relevant purpose, to ensure that it is accurate, up to date, complete, relevant and not misleading.

Macmahon will not retain personal information longer than is required for a lawful purpose. Retention periods may take account of employment, taxation, health and safety, insurance, contractual, regulatory, litigation-hold, limitation and record-management requirements. Information no longer required will be securely destroyed, deleted or permanently de-identified, subject to applicable law.

Overseas access, processing and disclosure

Personal information relating to New Zealand operations may be accessed, processed or stored by Macmahon related entities and service providers outside New Zealand, including in Australia and other countries in which Macmahon or its service providers operate.

Where Macmahon discloses personal information to a foreign person or entity, it will comply with Information Privacy Principle 12. Depending on the circumstances, Macmahon will have reasonable grounds to believe that the recipient is subject to the Privacy Act 2020 (New Zealand), is subject to comparable privacy safeguards, participates in an applicable binding scheme, or is contractually required to provide comparable safeguards. Alternatively, Macmahon may obtain the individual's express authorisation after informing the individual that comparable safeguards may not apply.

Where an overseas provider stores or processes information solely as Macmahon's agent and does not use it for its own purposes, Macmahon will use appropriate contractual, organisational and security controls.

Access and correction

An individual may request confirmation that Macmahon holds personal information about them and may request access to, or correction of, that information. Requests must be directed to the Privacy Officer using the contact details below. Macmahon may require evidence of identity or authority before responding.

Macmahon will respond within the period required by the Privacy Act 2020. If Macmahon refuses access or correction, extends the response period or transfers a request, it will provide the notices and reasons required by law. If a requested correction is not made, the individual may request that a statement of the correction sought be attached to the information.

Privacy Officer

You can direct any questions or complaints about this Privacy Policy to Macmahon's Privacy Officer. The Privacy Officer's functions include encouraging compliance with the Privacy Act 2020, dealing with access and correction requests, liaising with the Office of the Privacy Commissioner, supporting training and privacy impact assessments, and assisting with privacy incident response.

Complaints

A person who believes that Macmahon has not handled their personal information in accordance with this Schedule, the Policy or applicable law may complain to:

Privacy Officer/Company Secretary
Macmahon Holdings Limited
Address: 15 Hudswell Road, Perth Airport, 6105, Western Australia, Australia
Email: cosec@macmahon.com.au

Macmahon will acknowledge and assess the complaint, may request further information and will communicate the outcome to the complainant.

If the complainant is not satisfied with Macmahon's response, they may contact the Office of the Privacy Commissioner, New Zealand, through www.privacy.org.nz or by telephone on 0800 803 909.

Monitoring technology and privacy impact assessment

Before introducing or materially changing a system involving a material collection or use of personal information, including biometric, surveillance, tracking, fatigue-management or automated systems, Macmahon will consider the necessity and proportionality of the system, the sensitivity of the information, access and retention arrangements, notice requirements, security measures and whether a privacy impact assessment is appropriate.

Changes to this Schedule

Macmahon may update this Schedule to reflect changes to its operations, systems, legal obligations or privacy practices. The current controlled version will be made available through an appropriate Macmahon website, intranet, workplace or document-management channel. Where a change materially affects the handling of personal information, Macmahon will take reasonable steps to bring the change to the attention of affected individuals.

This Schedule was last updated on 10 September 2026.

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