

2022

Modern Slavery Statement



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Our Commitment



Respect for people is at the core of what we do. It underpins our values and our commitment to Environmental, Social and Corporate Governance. Incorporating ESG factors into the company's sourcing and purchasing practices is central to our continuous improvement efforts.

During this reporting period our focus has been on establishing systems and processes to better understand our supply chain and creating further awareness through education and training.

As a part of our commitment we have incorporated Modern Slavery risk into our policies, procedures and overall business framework. Our efforts continue to take a staged approach to systematically tackling this risk.

Company Overview

Founded in 1985 Bay Building Services has grown to become a major privately-owned building company operating in all states and territories within Australia, with the exception of the Northern Territory. The values of Bay Building Services (BBS) and our employees are the pillar of our success and growth around Australia:

| | |
|------------------|---|
| Integrity | Doing the right thing and being accountable |
| Teamwork | Involving our BBS colleagues |
| Honesty | Being open, transparent and ethical |
| Respect | Understanding and appreciating each other |

The purpose of this document, the BBS Modern Slavery Statement, is to recognise and report the actions we have undertaken to assess and address the modern slavery risks in our operations and in our supply chains, in compliance with the Modern Slavery Act 2018.

This document should be read in conjunction with the BBS Code of Conduct and Social Procurement Statement.

Structure & Governance

Bay Building Services is privately owned, and led by our Chairman (& Founder), CEO and a Directorship team of five, covering Insurance Building & Restoration, Major Loss & Specialty Building and Corporate Services.

Our Executive Team of twelve support and lead the business around the country, with Bay Building Services currently employing 290 FTE across its 8 offices.

Bay Building Services is committed to robust policies and practices that are critical to the continued success and prosperity of the organisation.

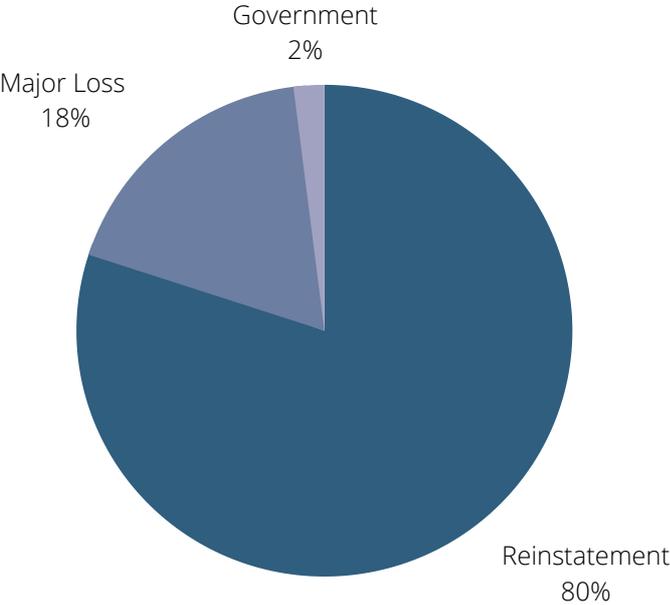
Our Modern Slavery risk mitigation is lead by our dedicated Modern Slavery Working Group (MSWG) comprising of:

- Director | People & Business Services
- Executive Manager | Legal & Compliance
- Procurement Lead | Construction & Operations

Progress against our Modern Slavery risk mitigation strategy is periodically reported to the MSWG and tabled at Board level.

Operations

As a nominated insurance builder, BBS’s main operations consist of assessing, quoting and coordinating the repair and/or restoration of insured premises, primarily residential, through our sub-contractor network of trades. Bay Building Services has operations in 7 States and Territories throughout Australia.



In conjunction to this, BBS also operates in the Major Loss & Specialty category, including responding to ‘catastrophe events’, Government tenders and engaging in large commercial / specialist works.

Operations

Our Focus Areas



Health & Safety

At Bay Building Services we remain committed to high standards of health and safety for our people, customers and partners.



Financial

Our accounts team's processes, third party research, and job systems ensure that we are keeping our supply chain paid on time and paid at fair market rates for the work they are undertaking.



Our Clients

We are collaborating with our clients to ensure that progress is shared, and that we are learning from their experiences and sharing the lessons we've learned with them.



Our People

Our people are our greatest assets, with diverse backgrounds from multiple industries and a keen focus on upskilling and development, we are confident that we are set up to face a changing world head-on.



Sustainability

Mother Nature has a key role in the work that comes through our doors. We recognize the impacts that the environment has on our clients and our customers, and also the effects that we have on our environment. Our sight is set on our environmental responsibility and the changes we can make for a better world.



Our Trades

We are proud of the businesses that partner with us and what we are able to accomplish together. We seek to learn from them also, as well as helping them improve on our innovations and insights.

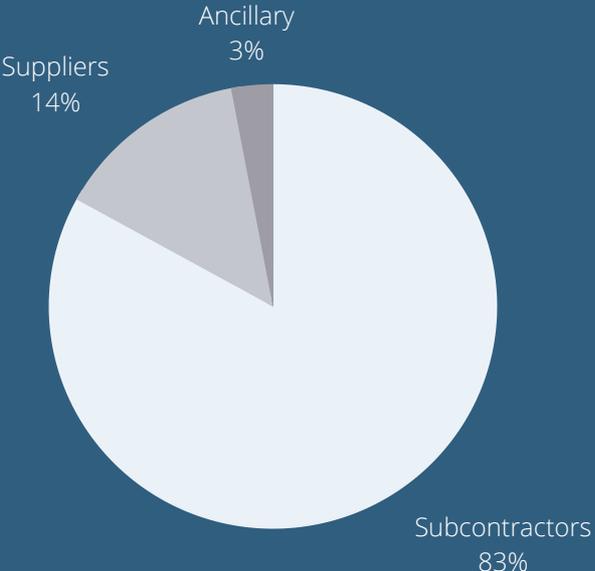
Supply Chain



Bay Building Services has approximately 2000 direct contractors and suppliers across the following categories.

- 01** Subcontractor – construction & restoration
- 02** Suppliers – materials, manufacture, import, transport sectors
- 03** Ancillary Products - items required for cost of sales, operations, office supplies.

While the majority of the supply chain is in our Subcontractor category, BBS also has direct off-shore contracts in the Supplier category and via third parties in the Ancillary Products category.



Operational Risk



1

Forced Labour

- Subcontractors in Construction and/or Restoration/Labour Hire
- Consideration – Under minimum wage/Debt bondage

2

Imported Products

- Ancillary Products e.g. Laptops, computers, phones, uniforms
- Consideration – Country of Origin

3

Vulnerability

- Subcontractors in Construction and/or Restoration/Labour Hire
- Migrant Workers/Language Barriers/Under Payment Superannuation

Further work has been done to highlight operational risks within the business as well as working to identify new risks. In a changing world with rising demands for materials, and uncertainty in supply chains, particularly from overseas imports, it is a key focus for us to ensure that we're purchasing through suppliers that exercise diligence around modern slavery risks.

Impact of COVID-19



As the Australian government allows overseas workers to return, we are ensuring we have the systems in place to minimize any employment risks and vulnerabilities for our direct employee workforce as well as our partner subcontractors and suppliers.

Whilst the impact of covid has decreased in the latter half of the reporting period, the effects are still being felt throughout the industry. We are facing increased shortages of materials and labour, causing delays in work, and a potential increase in modern slavery risks due to the nature of external pressures.

Actions & Consultation

During the reporting period, our efforts were focussed on reviewing and auditing our supply chain, as well as continuing to develop risk mitigation processes and ensuring their implementation.

Mitigation

Front and centre to our risk mitigation has been awareness and structured process. New suppliers and subcontractors pass multiple rationalization stages through multiple divisions of the business, including operations management, safety, and procurement.

Reporting

Reporting and reviews are now conducted on a monthly basis as to our supply chain and their acknowledgement of modern slavery requirements and practices.

Auditing

Over the reporting period we conducted internal audits on processes and compliance. Our next part of this will be conducting audits on randomly selected partners from our supply chain.

Systems

During the reporting period we have incorporated ESG policy and awareness into our system and process development.

Engagement

Our engagement strategy is reviewed regularly to ensure that it complies with our policies on ESG including Modern Slavery.

Collaboration

We work with our key suppliers and clients to ensure that we are all working towards the same common goals in the area of ESG

Effective Action

Our commitment to eliminating Modern Slavery Risks from our operations and supply chain hinges on continuous improvement. We will continue to progress supply chain transparency focusing on the following key areas:

2022/2023



CONCEPT

brainstorm improvement ideas



CREATE

best ideas come from collaboration



SHARE

develop and roll out new initiatives

- Implement targeted Supply Chain audits to facilitate collaborative 2-way engagement between our major suppliers
- Further expand our consultative mechanisms with leading industry bodies, key Clients and subject matter experts from varying industries
- Deep Dive study and analysis of primary work types and building projects,
- Expanding Whistleblowing reporting avenues to allow customers, trades and the general public further ease of access
- Develop a BBS Progress Scorecard and improve data capture, reporting and analysis
- Engaging an open dialogue from a range of internal stakeholders, including expanding communication, sharing and discussions and increasing general awareness.

Directors Approval



This Statement for financial year 2022 is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) and constitutes Bay Building Services Modern Slavery Statement.

The Statement has been approved by the Directors of Bay Building Services.

A handwritten signature in black ink, appearing to read 'Kane Malherbe', written in a cursive style.

Kane Malherbe
Chief Executive Officer
30th June 2022