



MODERN SLAVERY STATEMENT FY2024 - 2025

1300 979 667

INFO@GOLDFISHBAY.COM.AU

1/432 PARRAMATTA ROAD, PETERSHAM NSW 2049



CONTENTS

Introduction & Commitment	3
Who We Are	3
Our Approach to Modern Slavery and Ethical Conduct	4
Risk Management and Governance Framework	5
Measuring and Reviewing Our Progress	7
Statement Approval	9



GOLDFISH & BAY SERVICES PTY LTD MODERN SLAVERY STATEMENT FY2024–2025

Reporting Period: 31 July 2024 – 30 July 2025

ABN: 20 639 189 156

Location: 1/432 Parramatta Road, Petersham NSW 2049

Contact: info@goldfishbay.com.au | 1300 979 667

INTRODUCTION & COMMITMENT

Goldfish & Bay Services Pty Ltd (Goldfish & Bay) recognises the serious human rights risks associated with modern slavery and is committed to addressing these proactively and transparently. This statement is prepared in compliance with the Commonwealth Modern Slavery Act 2018 and the NSW Modern Slavery Act 2018, reflecting our alignment with government procurement requirements and client expectations.

We acknowledge that the engineering and construction industries face elevated risks due to subcontracted labour, imported materials, and complex supply chains. To mitigate these, we apply human rights due diligence, ethical procurement practices, supplier accountability, and continuous monitoring.

Internally, we foster a culture of respect, ethical awareness, and shared responsibility through training, reporting mechanisms, and strong governance. Externally, we collaborate with clients, suppliers, and subcontractors to strengthen transparency, responsible sourcing, and industry-wide improvement.

By reinforcing both our internal culture and external partnerships, we build resilience across our operations and supply chains – ensuring that risks are identified, exploitation is prevented, and human rights are upheld.

WHO WE ARE

Goldfish & Bay is a multidisciplinary engineering consultancy delivering mechanical, hydraulic, electrical, fire, civil, and vertical transportation services. We provide solutions-focused, integrated design outcomes across government, healthcare, aged care, commercial, and residential projects.

We are accredited to ISO 9001:2015 (Quality Management System), ISO 14001:2015 (Environmental Management System), and ISO 45001:2018 (Occupational Health & Safety Management System), reflecting our ongoing commitment to quality, sustainability, and safe work practices. Supported by comprehensive professional indemnity and liability insurance, we safeguard stakeholders, ensure accountability, and reinforce transparency, aligning with the objectives of the Modern Slavery Act 2018 (NSW).

Our strength lies in both technical delivery and a culture of integrity and collaboration. We empower our people through shared responsibility and training, and build trusted relationships with clients, suppliers, and subcontractors. This approach strengthens supply chain transparency and promotes collective action toward resilient, sustainable outcomes.

OUR APPROACH TO MODERN SLAVERY AND ETHICAL CONDUCT

At Goldfish & Bay, our modern slavery policy is more than a document, it reflects our values and the way we work every day. It guides how we prevent, detect, and respond to the risk of modern slavery across our projects, our supply chain, and our wider business relationships. We believe that protecting people from harm is everyone's responsibility, and every member of our team plays a role in making sure our work leaves a positive impact.

OUR ETHICAL OBJECTIVES AND COMMITMENTS

To create a safe and ethical environment for everyone connected to our business, we focus on:

- **Transparency in our supply chains:** Taking care to understand where our materials and services come from and who is behind them.
- **Education and awareness:** Giving our people and partners the knowledge to recognise risks and the confidence to speak up if something feels wrong.
- **Support for individuals:** Ensuring clear, safe pathways are available if anyone has concerns, with the reassurance that they will be heard and treated with respect.
- **Working together:** Building relationships with clients, suppliers, and communities based on trust, honesty, and fairness.
- **Ongoing improvement:** Regularly reviewing how we work so that our efforts to protect people remain strong and meaningful.

ETHICAL LEADERSHIP AND ACCOUNTABILITY

Our leaders and project managers complete a yearly accredited program, Ethics in Construction, delivered by TAFE NSW. This training is part of our HR system and explores integrity in decision-making, ethical leadership, and fair treatment of people. It helps our leaders to:

- Lead with care and respect inside the workplace.
- Maintain fair, open, and supportive relationships with suppliers and subcontractors.
- Balance the pressures of project delivery with the responsibility to protect people's wellbeing.

By investing in this training, we strengthen a culture where doing the right thing is central to how we work, and where leaders set the tone for both our people and our partners.

EMBEDDING ETHICAL CULTURE

We reinforce these values through:

- Annual workplace ethics sessions that bring teams together to reflect on respect, dignity, and responsibility.
- A strong induction program so new employees start their journey with us knowing that people's rights and wellbeing always come first.
- Safe reporting channels, ensuring that raising a concern is never met with fear or silence, but with understanding and action.

OUR BROADER IMPACT

This approach has a ripple effect across all those connected to us:

- Managers feel confident in leading ethically and supporting both their teams and partners.
- Employees and consultants know they are part of an organisation that values their wellbeing.
- Suppliers are encouraged to uphold fair and transparent practices, knowing they will be supported rather than isolated.
- Clients can trust that our projects are delivered with care, integrity, and respect for every person involved.

At its heart, this is about creating a culture where people feel safe, valued, and respected and where our business contributes to a better future, free from exploitation.

RISK MANAGEMENT AND GOVERNANCE FRAMEWORK

PURPOSE

This framework sets out how Goldfish & Bay identifies, assesses, and manages risks across our operations and supply chains. It ensures that risks including those relating to safety, quality, environment, financial exposure, and human rights are addressed in a way that protects people, supports ethical practices, and builds trust with our clients, partners, and communities.

GUIDING PRINCIPLES

Our approach is built on:

- **People First:** protecting the wellbeing of employees, consultants, suppliers, and the communities where we operate.
- **Transparency:** ensuring risks are openly identified, assessed, and addressed.
- **Shared Responsibility:** every person at Goldfish & Bay has a role in managing risks.
- **Continuous Learning:** improving processes through training, feedback, and lessons learned.
- **Collaboration:** working with clients, subcontractors, and industry partners to reduce risks across the supply chain.

RISK CATEGORIES

We recognize following key categories of risk:

- **Health, Safety & Wellbeing Risks :** Workplace safety hazards, site incidents, or psychosocial risks. Managed through ISO 45001:2018 (Occupational Health & Safety Management System), safety training, and wellbeing programs.
- **Quality & Technical Risks:** Design errors, non-compliance with codes, or project delays. Managed through ISO 9001:2015 (Quality Management System), peer reviews, and clear project governance.
- **Environmental & Sustainability Risks:** Impacts on the environment, resource efficiency, or climate resilience. Managed through ISO 14001:2015 (Environmental Management System), sustainable design practices, and compliance with regulatory frameworks.

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- **Financial & Commercial Risks:** Cost overruns, cash flow delays, or client insolvency. Managed through contract reviews, staged billing, and credit monitoring.
 - **Ethical & Modern Slavery Risks:** Exploitation of workers in supply chains, unfair subcontractor practices, or unethical procurement. Managed through supplier due diligence, safe reporting channels, ethics training, and annual Modern Slavery assessments.
 - **Reputation & Relationship Risks:** Client dissatisfaction, stakeholder disengagement, or community opposition. Managed through open communication, strong relationships, and values-driven project delivery.

RISK MANAGEMENT FRAMEWORK

Our framework follows a four-step cycle:

- **Identify:** Risks are identified through project planning, site inspections, supplier assessments, internal and external audits, and staff reporting.
- **Assess:** Each risk is assessed for likelihood and impact using a risk matrix (low to extreme). Special focus is given to risks affecting people's wellbeing and human rights.
- **Control:** Preventative measures are applied: training, process controls, contractual obligations, supplier audits, and safe design practices. Corrective actions are put in place quickly if risks materialise.
- **Monitor & Review:** Risks are reviewed regularly at project and organisational levels. Lessons learned are shared, and processes updated to prevent recurrence.

We recognise that an effective risk management framework is not only about preventing harm but also about building resilience. At Goldfish & Bay, this involves protecting the dignity and safety of all people we work with and maintaining designs, relationships, and culture that are robust, sustainable, and adaptive.

MEASURING AND REVIEWING OUR PROGRESS

At Goldfish & Bay, we know that commitments matter most when they are backed by action.

To ensure our approach to modern slavery is effective, we monitor progress through:

- The number of suppliers engaged under contracts that include Modern Slavery clauses,
- The delivery of annual staff training and awareness programs,
- Reports raised through our confidential whistleblower channels, and
- Annual internal reviews of procurement practices.

Each year, we further evaluate:

- The number of Modern Slavery training and awareness programs delivered,
- The number of potential risks or incidents identified and addressed,
- The number of supplier contracts issued with Modern Slavery clauses, and
- The level of supplier engagement to strengthen their own capacity to respond to risk.

These steps will strengthen both our internal culture and our external partnerships, ensuring we continue to support safe, ethical, and sustainable practices across our projects and supply chains.

REVIEW AND ACCOUNTABILITY

The effectiveness of this statement and its related actions is reviewed annually by the Operations Manager in consultation with the Directors. Findings and updates are presented to the Board for discussion and approval prior to the publication of each year's statement.

To build on our progress, Goldfish & Bay is committed to:

- Introducing a supplier prequalification questionnaire to enhance due diligence,
- Delivering formal Modern Slavery training for all staff by FY26,
- Establishing measurable KPIs to drive accountability, and
- Publishing an annual statement that transparently reports on our actions.

STATEMENT APPROVAL

Goldfish & Bay will continue to publish annual Modern Slavery Statements in accordance with the Australian Modern Slavery Act 2018. Each statement will be published on our website and shared with clients as evidence of our commitment to transparency and ethical practice.

As part of this process, our suppliers will continue to be engaged on our requirements, with clear communication of Goldfish & Bay's expectations in managing modern slavery risks. This ongoing engagement is both a safeguard within our supply chain and a reflection of our commitment to building trust, accountability, and ethical practice in everything we do.

This statement was prepared through internal consultation with relevant teams and key personnel across Goldfish & Bay Services Pty Ltd to ensure a consistent and coordinated approach to our operations, governance, and supply chains.

This Modern Slavery Statement was approved by the Board of Directors of Goldfish & Bay Services Pty Ltd on 15 August 2025.

Regards,



Fadi Taouk

Managing Director
Goldfish & Bay Services Pty Ltd

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