



# **BMI GROUP PTY LTD**

## **2022 MODERN SLAVERY STATEMENT**



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## 1. INTRODUCTION

The United Nations (UN) estimates there are approximately 40 million victims of modern slavery around the world and 16 million of these victims are exploited in the private economy.

While the greatest risks of modern slavery appear to be most prevalent in Africa, Asia and the Pacific region, Australia is not immune from modern slavery. The Australian Government (the Government) estimates there were 1,567 modern slavery victims in Australia between 2015 and 2017.

In line with the UN Guiding Principles on Business and Human Rights, the Australian Modern Slavery Act 2018 (Modern Slavery Act) was the first national legislation in the world to define modern slavery.

Modern slavery can occur in every industry and sector. It is also often linked to other crimes and activities that adversely impact human rights, such as corruption and environmental damage.

BMI Group is committed to acting ethically and with integrity and transparency in all our business dealings and relationships and to implementing systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

## 2. ABOUT THIS STATEMENT

This joint Modern Slavery Statement covers the activities of BMI Group Pty Ltd and the other reporting entities within its corporate group (details of which are set out in Section 1.3 below) (collectively referred to as “BMI”) during the financial year ended 30 June 2022. (“FY22”). As an Australian business generating annual consolidated revenue in excess of AU\$100 million, we acknowledge that BMI is required to publish annual Modern Slavery Statements, in accordance with the requirements of the Modern Slavery Act

This is BMI’s first Modern Slavery Statement, which we have prepared in relation to FY22.

### 2.1 WHAT IS MODERN SLAVERY

In this Statement, “modern slavery” and “modern slavery risk” have the following meanings:

**Modern Slavery** is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. The Modern Slavery Act defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. The worst forms of child labour include situations where children are subjected to slavery or similar practices or engaged in hazardous work.

**Modern Slavery Risk** is used to describe the prospect of a practice involving modern slavery occurring in a business’ operations and/or supply chain.

### 3. REPORTING CRITERIA

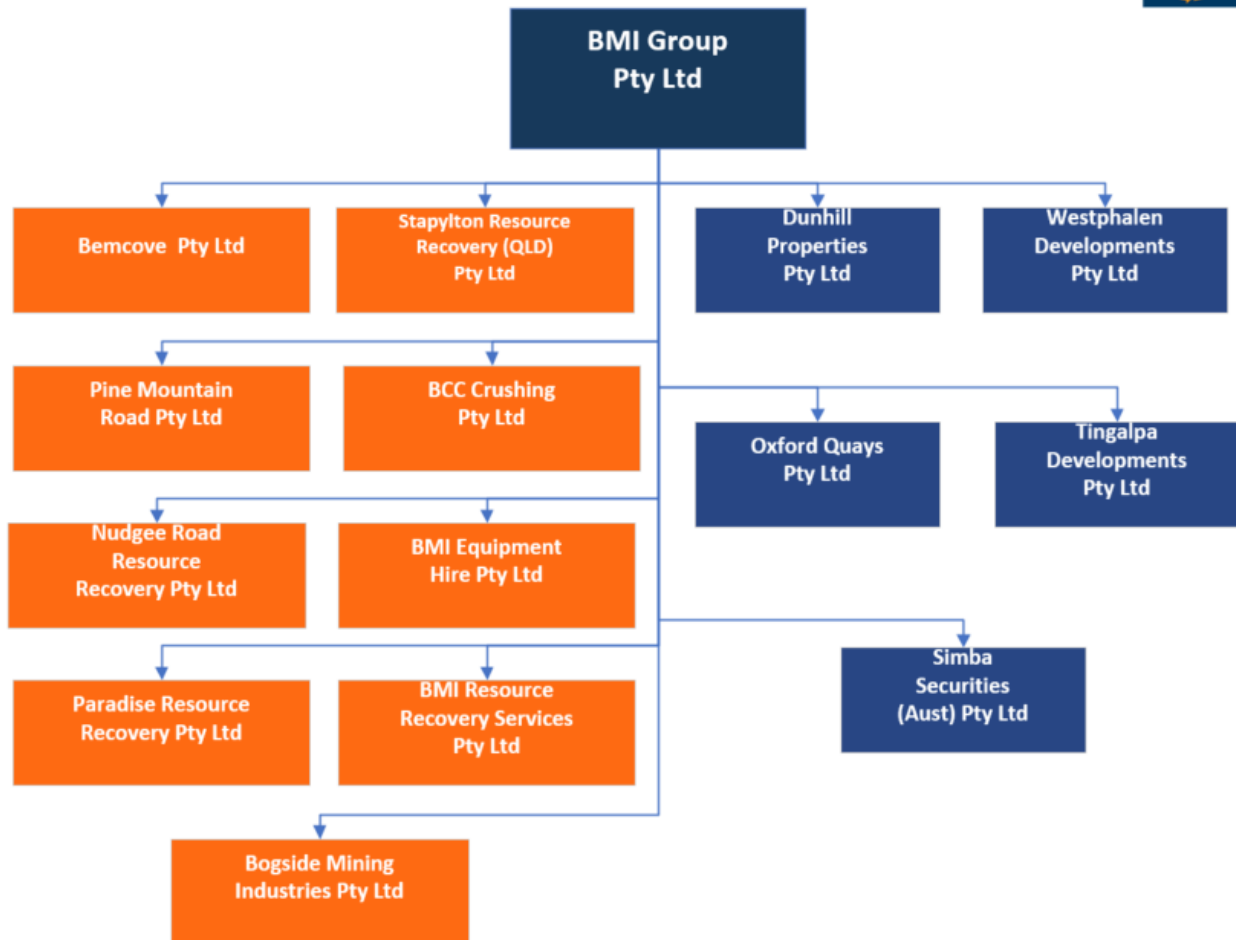
<b>Modern Slavery Act Mandatory Reporting Criterion</b>	<b>Reference in this Statement</b>
1. Identify the reporting entity	Section 2, Section 4.1
2. Describe the reporting entity's structure, operations, and supply chains	Sections 4.2, 4.3
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Section 4.4, Section 5
4. Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address risks, including due diligence and remediation processes	Section 6
5. Describe how the reporting entity assesses the effectiveness of such actions	Section 8
6. Describe the process of consultation with any entities the reporting entity owns or controls and, for a reporting entity covered by a joint Statement, the entity giving the Statement	Section 6.1
7. Include any other information that the reporting entity, or the entity giving the Statement, considers relevant	Section 7, Section 9

### 4. OUR COMPANY STRUCTURE, OPERATIONS AND SUPPLY CHAINS

#### 4.1 GROUP STRUCTURE

A Brisbane based market leader, firmly established at the forefront of both the property development and waste management industries, BMI Group is a family-owned business established in 1988 and is committed to supporting local communities and providing innovative solutions for its clients in both industries.

BMI has a workforce of over 100 people in Brisbane and Southeast Queensland, is comprised of multiple entities in Australia and the ultimate managing entity is BMI Group Pty Ltd.



## 4.2 BMI PROPERTY DIVISION

BMI is a market leader in the Brisbane property development industry, creating exclusive riverside residential projects, modern commercial spaces and providing its clients with innovative property solutions.

Through Dunhill Properties Pty Ltd, Westphalen Developments Pty Ltd, Tingalpa Developments, Simba Securities (Aust) Pty Ltd and Oxford Quays Pty Ltd, BMI has been instrumental in various urban redevelopment projects. The urban development of the riverside suburbs of Teneriffe and Bulimba, through its commercial, residential, and retail spaces is just one example. We have also made our mark in the Bowen Hills/Newstead area with the development of Reach Bulimba, Jordan Terrace/Folkestone Street, and the development of Breakfast Creek Wharf. Most recently, we have commenced the construction phase of our leading project “Dunhill” on Lytton Road at Morningside.

Our corporate philosophy ensures that BMI developments are not just based on economic viability, but also environmental sustainability, design creativity and cultural and community expectations. Our continued success has been a direct result of our commitment to excellence and innovation.

### 4.3 BMI RESOURCE RECOVERY

Recycling up to 90% of waste disposed at our sites, BMI is committed to providing sustainable practices, industry leading solutions and consistent improvement in recycling, resource re-use and resource recovery.

Through BMI Resource Recovery Services Pty Ltd, Stapylton Resource Recovery (QLD) Pty Ltd, Bemcove Pty Ltd, Nudgee Road Resource Recovery Pty Ltd, Pine Mountain Road Pty Ltd, Paradise Road Pty Ltd and Bogside Mining Industries Pty Ltd, BMI provides recycling, waste transfer and landfill activities across Southeast Queensland.

Resource recovery is focused on the separation of concrete, steel and timber from the waste stream to minimise waste to landfill and maximise recyclables. We also provide a broad range of quality recycled concrete products for use in the building, landscaping and civil construction industries. BMI is committed to providing sustainable practices, revolutionary solutions and consistent improvement in recycling, resource re-use and resource recovery.

BMI Group is focused not only on business, but also on community, and works with local schools and associations on sponsorship and support projects

### 4.4 OUR SUPPLY CHAIN

Our supply chain supports our multiple business entities each of which acts in accordance with BMI's values and vision.

The suppliers within our supply chain include providers of a variety of goods and services including but not limited to:

- corporate uniforms and personal protective equipment
- construction & building materials including raw resources
- machinery and equipment – purchase and hire
- transport and logistics
- car leasing
- design and architecture
- legal services
- communications services
- security services
- information and technology services
- environmental landscaping

We will continue to require that each supplier either manages their Modern Slavery risks with internal policies and processes or alternatively follows the relevant BMI policies.

## 5. MODERN SLAVERY RISKS

To assist with the identification of our modern slavery risks we will map our suppliers to better understand what is happening in our supply chains.

We will also highlight the following four indicator areas for review and consideration in assessing both existing and potential supply chain partners.

### 5.1 SECTOR AND INDUSTRY RISKS

Provision of Labour Hire Workers: Our resource recovery processes utilise a high proportion of labour hire candidates in operational areas. The provision of temporary /seasonal labour utilised on short-term contracts and via outsourcing arrangements has been highlighted as an area of risk within our business. We are particularly aware that recruitment strategies by suppliers, their agents or labour hire agencies can target specific individuals and groups from marginalised or disadvantaged communities.

### 5.2 PRODUCT AND SERVICES RISKS

Procurement of building fixtures/fittings: Some areas of our property development activities have been identified as areas of potential risk.

While we aim to procure our building supplies from within Australia, some components e.g., lighting, appliances and architectural / decorator items may be made in countries where there is a high risk of labour exploitation in the sourcing of raw materials used in the manufacturing process or in the manufacturing process itself.

### 5.3 GEOGRAPHIC RISKS

BMI provides uniforms and personal protective equipment (PPE) for all employees and others on site.

Some PPE items or components of individual PPE items are manufactured in countries which may have higher risks of modern slavery due to factors such as poor governance, weak rule of law or socio-economic factors like poverty.

### 5.4 ENTITY RISKS

BMI utilises the services of multiple and varied contracted service providers.

Some entities may have modern slavery risks due to various reasons which may include:

- Workers having little information about workplace entitlements and protections
- A general lack of information about workplace standards.
- Poor governance structures
- Previous record of treating workers poorly or track record of human rights violations

## 6. RISK MANAGEMENT, CONSULTATION AND TRAINING

The overall combination of our efforts which include, policies and procedures, procurement policies, due diligence checks and certifications from suppliers as to whether or not they engage in modern slavery practices, has proven to be critical to ensuring we maintain standards harmonious with national Modern Slavery legislation.

### 6.1 CONSULTATION

The development of this statement, in particular the identification of risk areas has been achieved by leveraging the knowledge and experience of numerous stakeholders throughout BMI.

At the group level we have also encouraged and considered contributions and feedback from those within our organisation who are involved in procurement activities.

### 6.2 DUE DILIGENCE

BMI engages with a wide range of suppliers for both goods and services. We have a long-standing practice of assessing prospective and existing suppliers to ensure we are doing business with like-minded organisations. We continue to monitor contract delivery and quality of performance, throughout our relationships.

### 6.3 TRAINING

BMI is committed to ensuring our people are provided with access to training in all the core policies, principles, brand values and conduct expectations that underpin our business. We also foster responsible and ethical community values by sponsoring and supporting local schools and associations on projects.

We believe that training and awareness are key controls in addressing the risks posed by modern slavery. We recognise the need to actively build the knowledge of all stakeholders to foster understanding of the risks of modern slavery and how we are approaching and managing the risk.

### 6.4 RELEVANT POLICIES & PROCEDURES

The majority of our suppliers and subcontractors are based in Australia, however there are some based overseas.

BMI maintains a suite of policies and procedures, which specify that all stakeholders must comply with legislations, regulations, procedures, and company standards, as a minimum requirement for working with or for BMI.

We have also commenced work on the review and redevelopment of company policies, procedures, and accompanying training, to address modern slavery risks in our business and the community.



## **7. KEY AREAS OF ACTION**

To help ensure achievement of our goals to satisfactorily address the risk of Modern Slavery within both our operations and our supply chain, we intend to:

- Continue to develop, review, and update our policies and procedures
- Conduct modern slavery training for relevant staff
- Publish our Modern Slavery Statement and associated policies across our business and encourage all staff to become familiar with its content
- Map our supply chain with particular emphasis on the potential risks in the sector/industry, products/services, geographic location, and any risks particular to the individual supplier
- Ensure our supplier contracts contain relevant contractual prohibitions against suppliers engaging in modern slavery practices
- Assess/ review our procurement partners with due diligence

## **8. HOW WE WILL MEASURE EFFECTIVENESS**

We will measure the effectiveness of our efforts to maintain standards harmonious with national Modern Slavery legislation by:

- conducting audits of our processes to ensure compliance; and
- investigating any reports of suspected breach of our Modern Slavery Standards; and
- engaging with our suppliers to achieve greater transparency in the sourcing of goods.

## **9. INTO THE FUTURE**

AT BMI we believe that successfully managing the risk of modern slavery requires ongoing management, collaboration, and commitment. We will continue to map our supply chains, consult, and engage with involved groups, re-visit our policies and procedures and work towards continual improvement of our internal systems via open communication.

## **10. APPROVAL OF MODERN SLAVERY STATEMENT**

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) and was approved by the Managing Director of BMI Group Pty Ltd on 07 July 2022.

**Balfour Irvine**  
**Managing Director**  
**BMI Group**