

Modern Slavery Statement





The A.G. Coombs Group of Companies is committed to exemplary corporate citizenship; guided by the principles of Environmental, Social and Governance (ESG) leadership. We recognise that respecting human rights is fundamental to sustainable business practices and long-term value creation. This commitment is embedded across our operations, supply chains, and stakeholder relationships, and is integral to our core values and decision making frameworks.

Russell F. Telford
Managing Director
A.G. Coombs Group Pty Ltd

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Managing Director's Introduction

Our Group of Companies is committed to being an exemplar corporate citizen, with a deep-rooted commitment to ethical leadership, sustainability, and social responsibility. We strive to lead by example, embedding responsible business practices across all facets of our operations.

Values-led governance and business ethics form the foundation of our organisation's principles. We are dedicated to conducting our operations with unwavering integrity, guided by a strong moral compass, a commitment to the highest standards of behaviour, and a robust focus on environmental, social and governance (ESG) elements. Our ESG strategy is not only a framework for sustainability but also a driver of innovation and resilience.

We are dedicated to conducting our operations with unwavering integrity, guided by a strong moral compass and a commitment to the highest standards of behaviour and strong focus on environmental, social and governance (ESG) elements.

Our governance practices are anchored by our core values, ensuring that the decisions we make align with our ethical foundation. By prioritizing values-led governance, we foster a culture of trust, transparency, and responsible conduct, driving not only our success but also our positive impact on society and the environment.

Respecting human rights is inherent throughout our business operations and is embedded in our core values and organisational culture. As a key component

of our overall ESG approach, our Group of Companies is absolutely committed to eradicating modern slavery wherever it may exist in our operations and supply chain. This commitment is strategically integrated into our broader sustainability and supply chain management framework, ensuring that ethical sourcing and human rights due diligence are central to our procurement and supplier engagement processes.

Our Group of Companies has several relevant Policy Statements including our Modern Slavery Policy, Code of Conduct, Supplier Code of Conduct, Supplier Diversity Policy, Fraud and Corruption Control Policy, Whistleblower Policy and associated supporting Procedures.

We recognise that as a significant purchaser of goods and services, our choices can impact communities and individuals. We take this responsibility seriously and actively engage with suppliers who demonstrate ethical conduct and transparency. We do not tolerate slavery, human trafficking, forced or child labour, or child exploitation, and we expect our partners to uphold these same standards.

We recognise that modern slavery can occur in every industry and sector and has severe consequences for victims. We have implemented and continue to evolve a comprehensive set of measures to mitigate these risks, including child labour or child exploitation. We have implemented and continue to evolve the following measures:

- Training to relevant employees, Executives and Directors in relation to Modern Slavery.
- Developed and implemented processes to monitor and audit our supply chain, including more detailed audits and interviews with identified high volume / high risk subcontractors and suppliers.



- Designated key personnel with responsibility to manage and implement key processes and procedures.
- Ensuring our procurement suite of documents contain robust provisions addressing modern slavery with our direct suppliers, contractors and supply chain generally.

Our goals for the coming years also include:

- Continued training to relevant employees including refresher training.
- Implementing further controls in our procurement process and undertaking diligence activities across our supply chain.

This statement demonstrates our alignment to the Modern Slavery Act to address slavery, human trafficking, forced or child labour or child exploitation across our supply chain.

We acknowledge we have further work to do, however we are building from a solid foundation to support our future goals and commitments in addressing modern slavery.

This statement is made pursuant to section 13 of the Modern Slavery Act 2018 (Cth) in relation to the operations and supply chains of the A.G. Coombs Group of Companies for the period 1 July 2023 to 30 June 2024, and was approved by the Board of A.G. Coombs Group Pty Ltd as the parent entity in October 2024.

Russell F. Telford
Managing Director
A.G. Coombs Group Pty Ltd

Our Structure, Operations & Supply Chain

The reporting entity is A.G. Coombs Group Pty Ltd and this statement relates to the following A.G. Coombs Group of Companies:

A.G. Coombs Pty Ltd (Head Office)
ABN 67 005 711 722

A.G. Coombs Pty Ltd
ABN 49 005 653 332

A.G. Coombs Advisory Pty Ltd
ABN 89 130 969 934

A.G. Coombs Servicing Pty Ltd
ABN 57 053 933 056

A.G. Coombs (NSW) Pty Ltd
ABN 60 134 239 768

A.G. Coombs (QLD) Pty Ltd
ABN 62 134 239 777

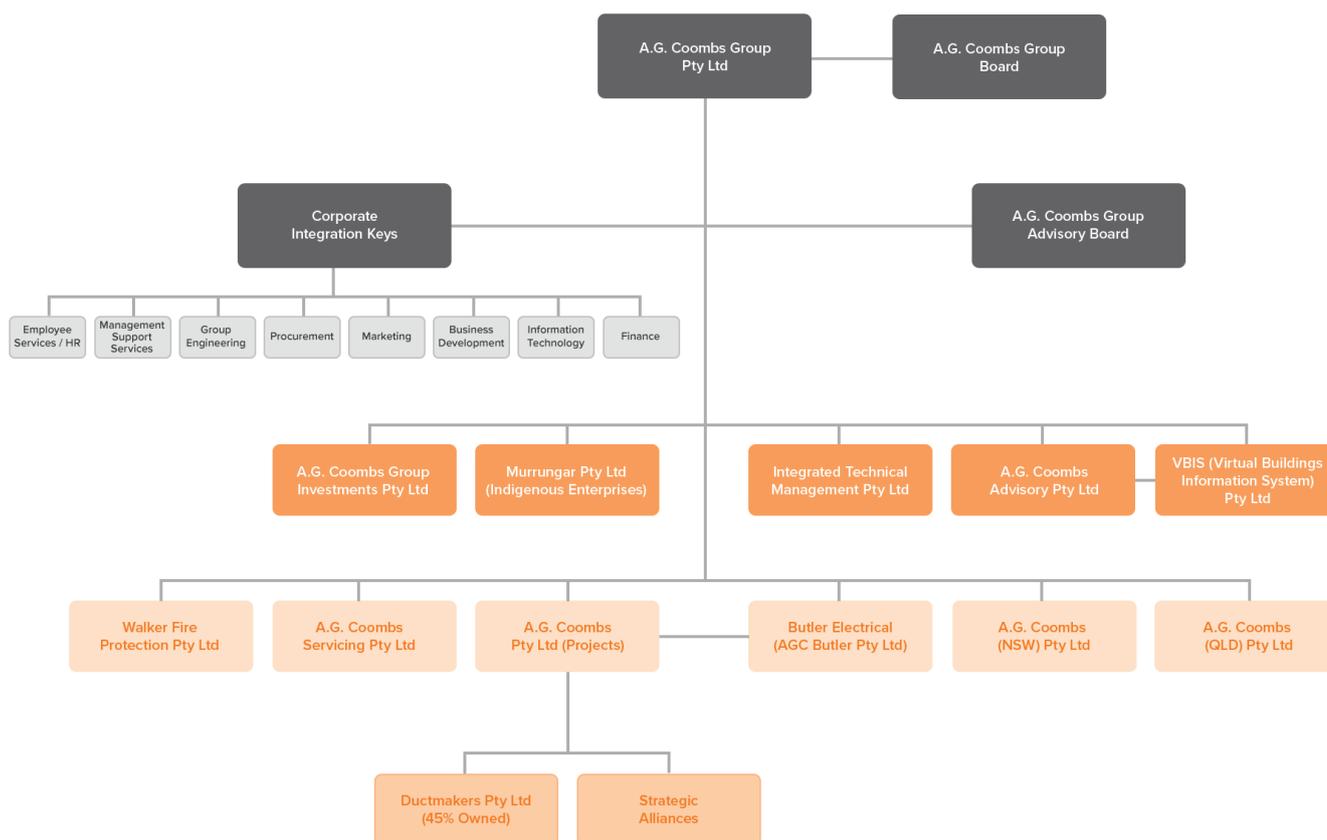
A.G. Coombs Pty Ltd (NSW Office)
ABN 49 005 653 332

Walker Fire Protection Pty Ltd
ABN 21 006 028 673

AGC Butler Pty Ltd T/A Butler Electrical Victoria
ABN 55 605 082 157

Integrated Technical Management Pty Ltd
ABN 96 105 075 858

Registered Address:
26 Cochranes Road
Moorabbin VIC 3189
+61 3 9248 2700



With a 80 year heritage, the A.G. Coombs Group commenced operations in 1945 and is a proudly Australian-owned and privately operated Group of Companies. A.G. Coombs provides an end to end capability; an integrated range of technical services for all systems in buildings, from advisory and design through to installation, commissioning, maintenance and ongoing operation and management, delivered through our specialist companies.

Our website provides more detailed information about our business, including our strategy, products and operations, as well as our approach to creating social value and sustainability. www.agcoombs.com.au



Our Supply Chain

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that any form of slavery is not taking place in our own business or supply chains.

Since publishing our FY23-24 Modern Slavery Statement, as part of our commitment to continuous improvement, we have further enhanced our procedures and processes to manage modern slavery requirements, including the selection, engagement and monitoring of our subcontractors and suppliers. As part of our audit and quality assurance program, during the reporting period we rigorously reviewed our supply chain prequalification questionnaire to further enhance our approach to Modern Slavery.

A.G. Coombs engage suppliers and subcontractors under formal terms and conditions which enshrine our expectation regarding modern slavery obligations. Prior to engagement, suppliers and subcontractors are required to complete a modern slavery self-assessment questionnaire to ensure that the supplier or subcontractor is both aware of, and can meet, our expectations. We have further refined supply chain audits and interviews to improve evidence gathering and to continue to raise awareness and educate. If a modern slavery issue (or potential issue) is identified, we work through a robust process with the non-compliant suppliers or subcontractors to rectify. Our subcontractor worker induction includes Modern Slavery and Whistleblower policies.

1200+

Direct Suppliers of
Goods and Services.

The A.G. Coombs Group utilises its strong network of existing suppliers, subcontractors and manufacturers, to maximise local industry participation in its supply chain.

A.G. Coombs' Group Procurement team manages and coordinates the purchase of goods and services from an established network of suppliers and subcontractors to deliver to our Clients. During the reporting period, A.G. Coombs procure goods and services from over 800 direct suppliers and subcontractors. Most of our suppliers and all of our subcontractors are based in Australia.

We aim to play a positive role in the communities where we operate and to generate social value. We strive to buy local products and engage local services. As part of our commitment to local procurement, we ensure that opportunities for local industry and supplier engagement are optimised.

We also ensure that local industries and suppliers in the areas in which we operate throughout Australia are identified and supported to increase local content where possible in the delivery of our services.



Managing Our Modern Slavery Risks

Since publishing our FY23 Modern Slavery Statement, we have continued to build on the good work we have done to ensure modern slavery is not present in our operations or our supply chain.

We have continued to implement rigorous steps into our supplier management processes to improve the way we identify, select and engage across our supply chain. This includes a mandatory requirement that all our suppliers complete a Pre-Qualification Compliance Questionnaire with questions relating to modern slavery.

We have over 500 suppliers who have provided responses and supporting evidence. We have also continued to implement our desktop audit programme for key suppliers.

This programme includes exploring specific risk factors and any relevant policies and procedures the supplier already has in place, any known history of modern slavery or related practices and whether a supplier code of conduct has been implemented by the supplier and cascaded through its supply chains

Our approach to managing modern slavery risks follows a robust methodology for identifying, mitigating, and remediating modern slavery risks, and assessing the effectiveness of these actions. Key management steps are set out below:

- We have strong and coherent policies and procedures relevant to human rights and modern slavery. These include our Modern Slavery Policy, Code of Conduct, Supplier Code of Conduct, Supplier Diversity Policy, Fraud and Corruption Control Policy, Whistleblower Policy and associated supporting procedures.
- Only suppliers and subcontractors who are approved through our supplier portal can be engaged to provide goods / services to the A.G. Coombs Group of Companies.
- We have a long established and well tested approval process in place to ensure that only suitably qualified and experienced organisations are engaged, and that roles, responsibilities, expectations and policies are clearly communicated.
- Our standard terms and conditions for all purchase orders set out all Modern Slavery obligations of the supplier when being engaged by the A.G. Coombs Group of Companies including supplier's consent to our audit programme.
- Our supplier surveying and random spot checking confirms their understanding, commitment and compliance to Modern Slavery practices. We have a detailed supplier and subcontractor self-assessment questionnaire about modern slavery as part of our prequalification process.
- Through our learning management system (LMS) we provide training on Modern Slavery is provided to all key personnel who engage and interact with our suppliers, including Procurement Teams, Estimators, Project Managers and Contract Managers.
- Our people are trained to raise any concerns and report any actual or suspected modern slavery following which we will engage in a fact-finding investigation and, in the case of a demonstrated case, being mindful of potential cause to the victim/s, consider remediation actions if any.

Monitoring and Reviewing the Effectiveness of these Actions

This Statement outlines the steps the A.G. Coombs Group of Companies has and continues to implement measures to ensure Modern Slavery is not taking place across our supply chain. As well as introducing an audit programme for our key suppliers, we continue to undertake random spot checking of our suppliers and conduct an annual Modern Slavery Risk Assessment to monitor changes and trends in our risk profile across both our operations and supply chain to ensure our approach to risk identification and assessment remains effective.



Monitoring and Reviewing Modern Slavery Management Across the A.G. Coombs Group of Companies

Russell Telford is the Managing Director of the A.G. Coombs Group of Companies which includes each business entity. The A.G. Coombs Group of Companies has a Group Board, consisting of Executive Directors and Non-Executives including Non-Executive Chair. The A.G. Coombs Group Board meet monthly.

The A.G. Coombs Executive Team, which includes the Executives and General Managers of each A.G. Coombs entity are members of the A.G. Coombs Advisory Board, chaired by the A.G. Coombs Group Managing Director. It also meets monthly.

A.G. Coombs has an established committee to manage our Modern Slavery practices to ensure they are effective and continually improved.

Prior to this reporting period A.G. Coombs has refined our processes regarding measuring and reporting against ESG goals through our ESG working group – our Modern Slavery team is integral to this working group.

The reporting and assessment of the effectiveness of our Modern Slavery Policies, Procedures, and actions as outlined in this Statement are reported and monitored with identified changes implemented to mitigate our risk profile

across both our operations and supply chain to make sure that our approach to risk identification and assessment remains effective.

Further information and training is provided to our personnel focussing on our Core Values, Code of Conduct and governance and compliance practices. This includes training and refreshers on policy statements, including our Modern Slavery Policy, Code of Conduct, Supplier Code of Conduct, Supplier Diversity Policy, Fraud and Corruption Control Policy, Whistleblower Policy and associated supporting Procedures.

All A.G. Coombs Group of Companies Policies and Procedures are reviewed and updated on a regular basis, including review and sign-off by the Managing Director. We have updated our policy suite in this reporting period focusing on key diversity and inclusion pillars.



A.G. Coombs Group

Melbourne | Sydney | Canberra | Brisbane | Townsville

Head Office:

26 Cochranes Road
Moorabbin VIC 3189 Australia

The A.G. Coombs Group is a privately owned Australian group of companies that provides an integrated range of technical services for all systems in buildings, from design through to installation, commissioning, maintenance and ongoing operation and management. Established in 1945, A.G. Coombs has a national capability with major operations on Australia's eastern seaboard.

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Brisbane +61 7 3648 0500 | Townsville +61 7 4431 1000 | agcoombs.com.au

A.G. Coombs Advisory

A.G. Coombs Advisory provides quality advice and consulting services across numerous disciplines including mechanical, electrical, hydraulics and fire protection services and building technologies. A.G. Coombs Advisory is Australia's leading provider of Green Star Independent Commissioning Agent (ICA) services for projects requiring Green Star Certification.

+61 3 9248 2700 | agcoombs.com.au/advisory

A.G. Coombs Projects

A.G. Coombs Projects leverage a National Centre of Excellence approach, where teamwork and project management skills set the company apart. This approach also provides high end engineering, project management and site personnel to deliver successful projects throughout Australia.

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A.G. Coombs Service

A.G. Coombs Service is a specialist provider of air conditioning, mechanical services, building controls and bundled services maintenance. Delivering 24/7 building support, the company is a preferred supplier to the Facilities Management Industry and provides professionally managed, highly qualified technical staff to achieve improved reliability, lower costs and regulatory compliance in commercial, retail and industrial buildings.

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Walker Fire Protection

Walker Fire Protection provides a range of fire protection and detection services, from high end project engineering advice and consultancy through to concept and detailed design, installation of all types of fire detection and suppression systems, and ongoing inspection, testing, maintenance and regulatory compliance support.

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Butler Electrical

Butler Electrical provides comprehensive mechanical electrical, commercial electrical, industrial electrical, data & communication installation and switchboard fabrication supported by its engineering design services.

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Integrated Technical Management

Integrated Technical Management is a high quality provider of technical facilities management specialising in technically complex and critical facilities such as data centres, major commercial complexes, museums and cultural facilities.

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Modern Slavery Statement FY24-25

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