

# MODERN SLAVERY STATEMENT

Plenary Group Holdings Pty Ltd | FY2020





This page: Toowoomba Bypass (credit Nexus Infrastructure)  
Cover image: Victorian Comprehensive Cancer Centre (credit Peter Bennetts)

## INTRODUCTION

### What is modern slavery?

The term “modern slavery” describes situations in which coercion, threats or deception are used to exploit victims and undermine their freedom. Modern slavery takes many forms including slavery, servitude, forced labour, debt bondage, deceptive recruiting for labour or services, the worst forms of child labour (where children are exploited through slavery like practices or exposed to hazardous work) and forced marriage.

Based on the Global Slavery Index<sup>1</sup>, an estimated 40.3 million people are trapped in slavery worldwide, with women and girls disproportionately affected. In 2016, it was estimated that around 16 million people were involved in forced labour situations in the private sector.<sup>2</sup>

### Our vision

Plenary Group Holdings Pty Ltd (Plenary)’s vision is to be a world leader in developing, providing and managing public infrastructure and to be recognised for a distinctive approach that delivers outstanding results for clients, partners, communities and the environment. In line with our vision, Plenary is committed to conducting its business in accordance with high levels of ethical and professional standards and is committed to recognising and respecting human rights. Our vision and values (including a focus on “speaking up” when an individual believes that someone is not adhering to the Code, other Plenary policies, laws, rules or regulations) are articulated in our Code of Conduct.

Plenary’s core values include integrity, diversity and respect. These values express the professional behaviours that we believe in as an organisation. As such Plenary has a zero tolerance approach to all forms of modern slavery and is committed to doing what it can to help eradicate modern slavery.

Plenary recognises that the nature of its business means that it might be exposed to instances of modern slavery in its supply chains.

We are committed to ongoing engagement with our stakeholders to better collaborate in respecting human rights. We are also committed to undertaking further work to identify and take steps to prevent modern slavery.

### Reporting entity

For the purposes of this Modern Slavery Statement the reporting entity is Plenary Group Holdings Pty Ltd (ACN 607 311 946).

This Modern Slavery Statement covers Plenary’s reporting period of 1 January 2020 to 31 December 2020.

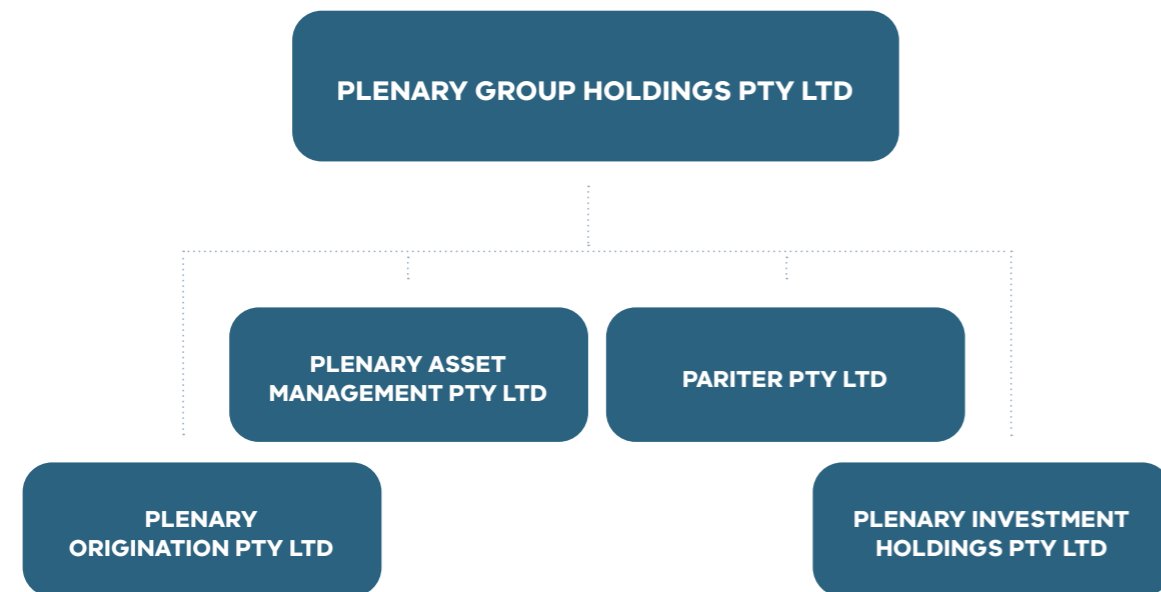
# OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

## Structure

Plenary was founded in 2004 and is Asia Pacific's largest public-private partnership firm, with a team of more than 130 specialists helping to deliver or manage public infrastructure in the areas of transport, health, education, water and defence.

Plenary comprises several business units that each form an integral part of the business and are fundamental in achieving our vision of being a world leader in developing, providing and managing public infrastructure.

The structure chart below sets out the major Plenary business units.



- Plenary Origination focuses on securing infrastructure development opportunities through industry-leading expertise in the tendering, financing and structuring of infrastructure projects.
- Plenary Asset Management focuses on the design, construction, delivery and long-term management of projects.
- Pariter is a development and project management company focused on the origination, development and management of community infrastructure assets.
- Plenary Investment Holdings is responsible for investing Plenary equity in different public-private partnership (PPP) special purpose vehicle (SPV) projects.



## Operations

Plenary is an independent long-term investor, developer and manager of public infrastructure.

We are a PPP (or P3) specialist.

We adopt a holistic approach to our projects embracing finance, design and construction, complementary commercial development and the ongoing management and operation of assets.



Our Australian PPP portfolio consists of 19 assets under management and is worth more than \$23 billion.



We build long-term relationships with our stakeholders built on a foundation of trust and fairness, delivering outstanding results for clients, partners and communities.

In pursuing our business objectives and strategies Plenary engages with a multitude of stakeholders, clients and partners from a diverse range of sectors.

- Plenary Origination, in pursuing infrastructure development opportunities, partners with a diverse range of stakeholders in the domain of corporate finance, design and construction, facilities management and services.
- Plenary Asset Management, as a long-term project manager, manages stakeholders involved in design and construction during the delivery phase of the projects and services and facilities management during the operations phase.

- Pariter works with clubs and community organisations, lenders and design and construction partners to deliver both residential and commercial opportunities capable of subsidising refurbishment and precinct activation, leading to increased revenue and greater club utility for communities.
- Plenary Investment Holdings invests equity in PPP SPV vehicles.

In Australia, Plenary has over 130 employees and has offices in Melbourne, Sydney, Brisbane and Adelaide. It also has an office in Singapore.

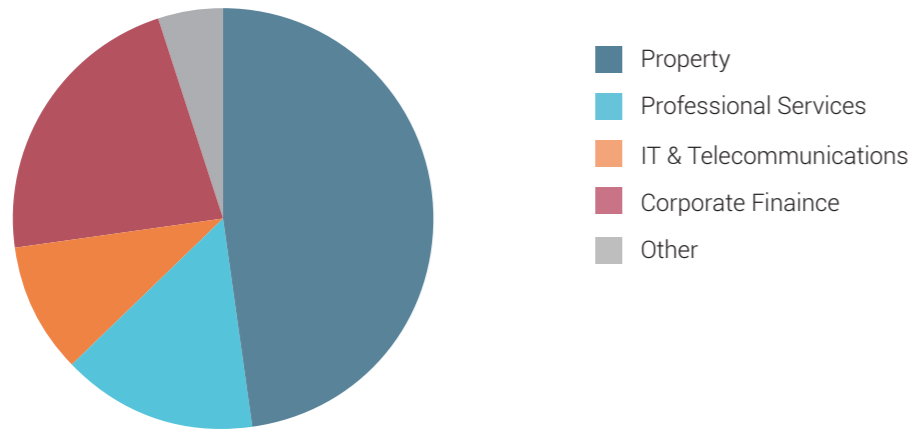
### Supply Chains

In the 2020 financial year Plenary spent approximately \$7 million on corporate costs procuring goods and services with 206 vendors.

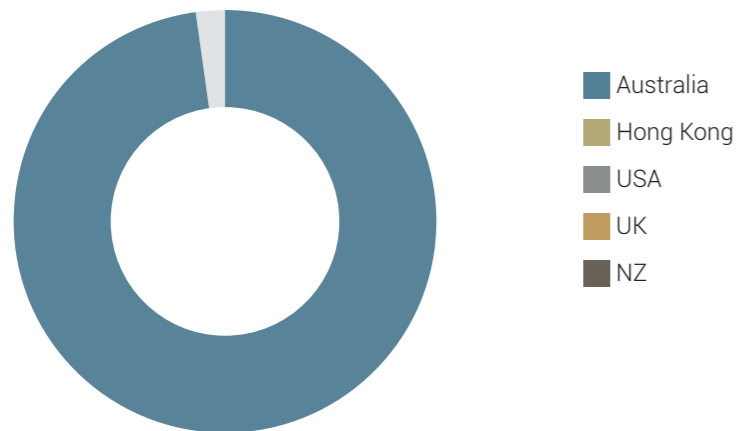
The main areas of supplier spend at a corporate level were:

- Property: including expenses for the leases of our offices.
- Professional Services: covering accounting and auditing, insurance brokers, legal and tax advice and consultants.
- Information Technology & Telecommunications: including cloud and network services, software solutions, equipment, telecommunications and printing.
- Communications: including expenses for news services and media monitoring services.
- Corporate finance: including finance and interest charges at a corporate level.

### Top 25 corporate supplier spend



### Geographical spend



Melbourne Convention and Exhibition Centre (credit Peter Bennetts)

## RISK OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS AND IN THE OPERATIONS AND SUPPLY CHAINS OF THE ENTITIES WHICH WE OWN OR CONTROL

Guidance on how to identify risks of modern slavery in our operations and supply chains was sought from publicly available resources and external advisers to build an understanding of the potential risk sectors and geographies.

While conducting our initial analysis we referred to resources such as the Global Slavery Index 2018, the Australian Council of Superannuation Investors' Modern Slavery Report Guide for Investors and materials and information on risks of modern slavery produced by the International Labour Organization.

We have considered relevant risks of modern slavery practices by reference to a range of intersecting factors such as business activities, labour force structure, sector and social, political and environmental conditions in the countries in which our suppliers operate.

### Operations

Across its operations Plenary works with contractors who provide cleaning and security services. These sectors are generally considered to be at risk of instances of modern slavery. However Plenary partners with Australian based contractors in procuring those services and therefore considers the risk of modern slavery across these operations to be low.

### Supply chains

In preparing this statement we focused on our suppliers with whom we have a direct contractual relationship (i.e. tier 1 suppliers). However, we acknowledge that incidences of modern slavery can exist throughout supply chains at any level and we are committed to assessing and reporting on these risks further in future years and statements as part of our process for continuous improvement.

Our initial risk assessment consisted of a desktop review of our suppliers and review of what peers and competitors have undertaken in this space. This assessment indicated that there are certain risk factors present in our supply chains which may increase the potential for risks of modern slavery practices occurring in them.

The risk factors which we have identified in our supply chains are:

- Construction sector: this sector presents elevated risks of modern slavery as a result of factors such as potentially unsafe conditions, use of low-skilled labour, long and complex supply chains and tight project deadlines. In pursuing PPP opportunities, Plenary will, when successful, invest equity (potentially with other co-investors) in SPVs. These SPVs enter into Design and Construction and Facilities Management and Services contracts and these contractors each have lengthy and complex supply chains with links to different geographies. There is a risk that somewhere in these supply chains there might be instances or risks of modern slavery practices, for example in relation to the procuring of raw materials or in relation to the manufacture of products necessary to deliver the design or construction of a project.
- Services procurement (such as building services, cleaning, travel, security and maintenance services): although Plenary recognises that these are potential high risk areas, the majority of such services which Plenary procures are from Australian based contractors who comply with applicable Australian laws. Plenary seeks to ensure that the values and ethics of these contractors reflect those of Plenary wherever possible.
- Geographies: certain supply chains extend to e.g. China, which is a geography that has been identified as carrying a risk of modern slavery.
- Branded and un-branded goods not for resale: Plenary procures corporate gifts and gadgets at regular intervals and there is a risk when procuring such goods that in the supply chain of the suppliers there might be instances of modern slavery. This category of goods has been identified as a higher risk category for instances of modern slavery and Plenary acknowledges that this area will need to be examined further.

Despite the existence of these risk factors in our supply chains with our direct suppliers, we are not aware of any reported instances of modern slavery which have occurred with any of our tier 1 suppliers. However, as part of our continuous improvement program we are committed to further examining and assessing our supply chains. We recognise the potential for instances of modern slavery practices occurring further down our supply chains and we will strive to analyse and report on lower levels of our supply chains (i.e. beyond tier 1) in our next modern slavery statement.

# ACTIONS TAKEN BY PLENARY AND THE ENTITIES WHICH PLENARY OWNS OR CONTROLS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

## Actions

In FY2020 Plenary has taken steps to assess and address the risks of modern slavery practices occurring in our operations and supply chains including:

- The adoption of a specific modern slavery policy which applies to and has been communicated to all directors, officers and employees of Plenary and all entities owned and controlled by Plenary and which makes clear that Plenary adopts a zero tolerance approach to all forms of modern slavery.
- The mapping of our supply chains, initially at tier 1 level, and assessment of the risk factors present in those supply chains. Our compliance, risk, legal and finance teams worked together to conduct a desktop analysis of available information in order to conduct an initial analysis of our supply chains.
- The drafting of a modern slavery questionnaire to be rolled out to all suppliers and contractors to assist in assessing modern slavery risk factors. The questionnaire contains various questions, the answers to which will help us assess the risks of modern slavery occurring in our supply chains. For example, the questionnaire includes questions about and requests for information on:
  - the structure of the supplier's business;
  - the geographical locations from which raw materials or components for products are sourced;
  - whether any work is outsourced;
  - whether any contract workers/seasonal workers are used;
  - details of the supplier's suppliers and contractors including indications of which suppliers/contractors are critical to the supplier's business; who within the supplier is responsible for those relationships; and whether human rights and labour standards are part of the supplier's due diligence processes;
  - the frequency with which the supplier reviews its relationships with its suppliers and contractors;
  - confirmation that the supplier will comply with our modern slavery policy;
  - a request to be provided with any modern slavery related policies, codes or procedure documents which the supplier has adopted or follows;
  - details about any reported incidents of modern slavery in the supplier's operations or supply chains; and
  - whether the supplier conducts audits of its operations and supply chains.

It was intended that this questionnaire be rolled out to all suppliers during 2020, however the roll-out has been deferred to 2021 due to the Covid-19 pandemic (see further details below).



Sydney Metro (credit NSW Government)

## Remediation processes

Plenary is committed to investigating any report of potential incidences of modern slavery occurring anywhere in our operations or supply chains.

In line with our vision and values we confirm that we would take all appropriate steps to rectify any confirmed incidences of modern slavery

in our operations or supply chains. Plenary would work collaboratively with its suppliers and, if necessary, their suppliers, to achieve these goals. If, for any reason, progress in this regard was not possible, Plenary would take steps to sever its connections to the offending supplier or sub-supplier.

## ASSESSING THE EFFECTIVENESS OF ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Plenary will review its modern slavery policy and modern slavery questionnaire in its next reporting period (and on an annual basis) to ensure that they remain accurate, up to date and effective.

During 2020 we also invited one of our key sub-contractors in the Facilities Management and Services Space to present its Modern Slavery Policy and the initiatives it has taken to assess any risks of modern slavery in its operations as well as how it would respond to any confirmed incidences should these occur.

### Consultation

Plenary's group structure (incorporating entities which are owned and controlled by Plenary) is set out earlier in this statement.

Plenary is a well-integrated business. Its centralised legal, compliance, finance, HR and communications functions provide services to all Plenary business units. Consequently, the actions taken to assess and address modern slavery risks referred to earlier in this statement apply to all those business units.

Each of Plenary's business units (chiefly via its company secretary) was given an opportunity to participate in the preparation of this statement.

### Additional information

Plenary is committed to working to improve its assessment and addressing of modern slavery risks and as such is committed to implementing the following measures in FY 2021:

- the provision of business-wide modern slavery awareness training which will stress the importance of assessing modern slavery risks when conducting our business;
- conducting an information session on our first modern slavery statement;
- set up processes to discuss and review engagement and feedback between key areas of the business in relation to modern slavery risks;
- communication and engagement with all stakeholders on our modern slavery policy, which will also confirm our expectations;
- the incorporation of modern slavery risks into project bid processes;
- the development of procurement guidelines;
- the roll out of our modern slavery questionnaire to major tier 1 suppliers; and
- subscribing to the Principles for Responsible Investment (PRI).

After implementation of the above measures Plenary will be better placed to assess and address:

- further supply chain risks based on the findings from the previously implemented measures;
- potential internal audits;
- the possibility of partnering with industry groups;
- potential inclusion of modern slavery clauses in contracts with relevant stakeholders to ensure Plenary has sufficient leverage to influence stakeholders to change their practices where necessary.

### Impact of Covid 19

The Covid-19 pandemic has forced Plenary, like many other businesses, to work remotely and conduct the majority of its business online. This new environment and the second lockdown in Victoria were factors which influenced our decision to delay the roll out of our modern slavery questionnaire as mentioned earlier in this statement.

As restrictions have eased and businesses have become accustomed to the new working environment, we will be better placed to focus on the roll out of the modern slavery questionnaire in 2021.

### Approval

This Modern Slavery Statement is made in accordance with section 13 of the Modern Slavery Act 2018 (Cth).

This statement has been approved by the Board of Directors of Plenary Group Holdings Pty Ltd.

Signed for and on behalf of  
Plenary Group Holdings Pty Ltd



**John O'Rourke**  
Chairman,  
Plenary Group Holdings Pty Ltd



