

The image shows two construction workers from behind, standing on a concrete floor with a complex network of steel rebar. They are wearing white hard hats and bright yellow high-visibility safety vests with the 'Buildcorp' logo on the back. The worker on the left is wearing a white hard hat and a striped shirt, while the worker on the right is wearing a white hard hat with orange ear protection and a striped shirt. The background is filled with the intricate grid of rebar, suggesting a large-scale construction project.

**Buildcorp**

# Modern Slavery Statement 2021

Buildcorp Holdings Pty Limited

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# Introduction

Since 2021 Buildcorp has been committed to the United Nations Global Compact corporate responsibility initiative and its principles in the areas of human rights, labour, the environment and anti-corruption.

We understand the gravity of our responsibility in these areas and have aligned our actions with the United Nation's Sustainable Development Goals.

Modern slavery is a significant global issue, involving grave abuses of human rights. It includes human trafficking, slavery, servitude, forced marriage, forced labour or services, and the worst forms of child labour. According to the International Labor Organisation and Walk Free Foundation, 23% of the global profit generated by forced economic exploitation is created in the construction, manufacturing, mining and utilities industries.

To do our part in addressing this unacceptable statistic, we invest in a range of initiatives to support responsible procurement across our business. These initiatives aim to mitigate risk in our supply chain by complying with human rights, labour rights and environmental laws. Additionally, our demonstrated approach to the sustainable growth of our business, ensures the long-term job security of our employees, suppliers and subcontractors.

We are all committed to ensuring workers within our supply chain are treated fairly, ethically and with respect. However, we also recognise that the construction industry has heightened exposure to Modern Slavery risk through challenges to supply chain transparency. In this 2021 Modern Slavery Statement we outline our ongoing actions and commitment to work with our project partners to understand our supply chain risks and eliminate modern slavery in our operations.

**Tony Sukkar AM**

Director

Buildcorp Holdings Pty Limited

10 December 2021



We are all committed to ensuring workers within our supply chain are treated fairly, ethically and with respect.

**WE SUPPORT**



# Structure, operations, and supply chain

## Overview

Buildcorp operates in the non-residential construction industry across three broad market sectors, each with similar supply chains:



New build projects such as health, education, sporting facilities and commercial offices



Fit-out and refurbishment projects, primarily in existing commercial office buildings



Building remediation projects in residential, commercial and infrastructure facilities

**Buildcorp's** business operations are headquartered in Sydney with offices in Brisbane and Melbourne.



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### Victoria

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Level 3, 31 King Street  
Melbourne VIC 3000  
P 03 9975 8800

### Our people

At 30 June 2021, Buildcorp employed 375 staff; nearly all of whom are employed directly and under permanent, fixed term, part-time or casual contracts, or under enterprise bargaining agreements. These arrangements significantly reduce the likelihood of modern slavery. All Buildcorp employment contracts meet or exceed applicable state and federal employment standards.

### Subcontractors

Buildcorp is a project management-based construction company in which the majority of worksite activities are subcontracted. Buildcorp deals with approximately 250 subcontractor businesses at any one time. All of these subcontractors and nearly all their suppliers are located in Australia.

The vast majority of our supply chain businesses would be classified as small to medium enterprises (SMEs) employing fewer than 200 employees, who may not be aware of, or do not have accountability under the Act.

In many instances, these subcontractors engage their own subcontractors or material suppliers. Buildcorp's subcontract engagement agreements require subcontractors to seek approval before subcontracting any of their own works.



**All Buildcorp employment contracts meet or exceed applicable state and federal employment standards.**

### Labour hire

Like many other employers in our industry, Buildcorp makes use of workforce labour hire arrangements, working with reputable organisations to provide these services. We are mindful that this means we may not always have direct control over third-party recruitment practices or complete transparency over their terms and conditions of employment.

### Operational procurement

In addition to subcontractor and/or supplier procurement, we also source a diverse range of goods and services including:

- ▼ Plant and equipment hire
- ▼ Professional engineering services
- ▼ Workforce labour hire
- ▼ Business services and products including cleaning

Over 95% of these products and services are sourced from Australian based businesses, who are required to comply with our Supplier Code of Conduct.

### Imported construction materials

We recognise that, as our imported construction materials are sourced, processed and assembled, they may traverse several countries, which may have an elevated risk of modern slavery. The construction supply chain for raw materials is long, complex and often opaque, making it extremely challenging for end users to trace their origins. We will continue to work with our suppliers to push for greater transparency around modern slavery issues.

# Risk of modern slavery in supply chain

The property and construction sector faces an elevated risk of modern slavery within its operations and supply chains as a result of intersecting structural and contextual risk factors<sup>1</sup>. Through use of temporary and irregular workers in low-skilled and low-waged jobs, in both the industry workforce and in the production and sourcing of building materials, this risk is heightened in the Asia Pacific where construction industry workers make up 18% of those subject to modern slavery.

## Lifecycle assessment

In 2021 Buildcorp conducted a lifecycle assessment using the Social Hotspot Database to identify the potential risks, both on and offshore, in our supply chain. Results indicated that 26% of Buildcorp's supply chain by spend carries very high likelihood of modern slavery, which is comparable across our industry. We identified the key categories of concern where likelihood of modern slavery existed which included:



### Labour hire

Underpayment, indentured workers, and exploitation of migrants in contracted and subcontracted services, such as demolition and cleaning.



### Materials

Labour rights, health & safety, and human rights and governance in the overseas supply chain of construction materials such as timber, plastic, glass, cement, gypsum, hardware, metals, tiles, textiles, brick, stones and sand.



### Mechanical Equipment

Labour rights and health & safety in overseas supply chains of parts, equipment (for in machinery, lifts etc), engine or vehicle parts and other manufactured goods including the production of metal products.



### Electronics

Labour conditions and health & safety in overseas electronics supply chains, particularly child labour.

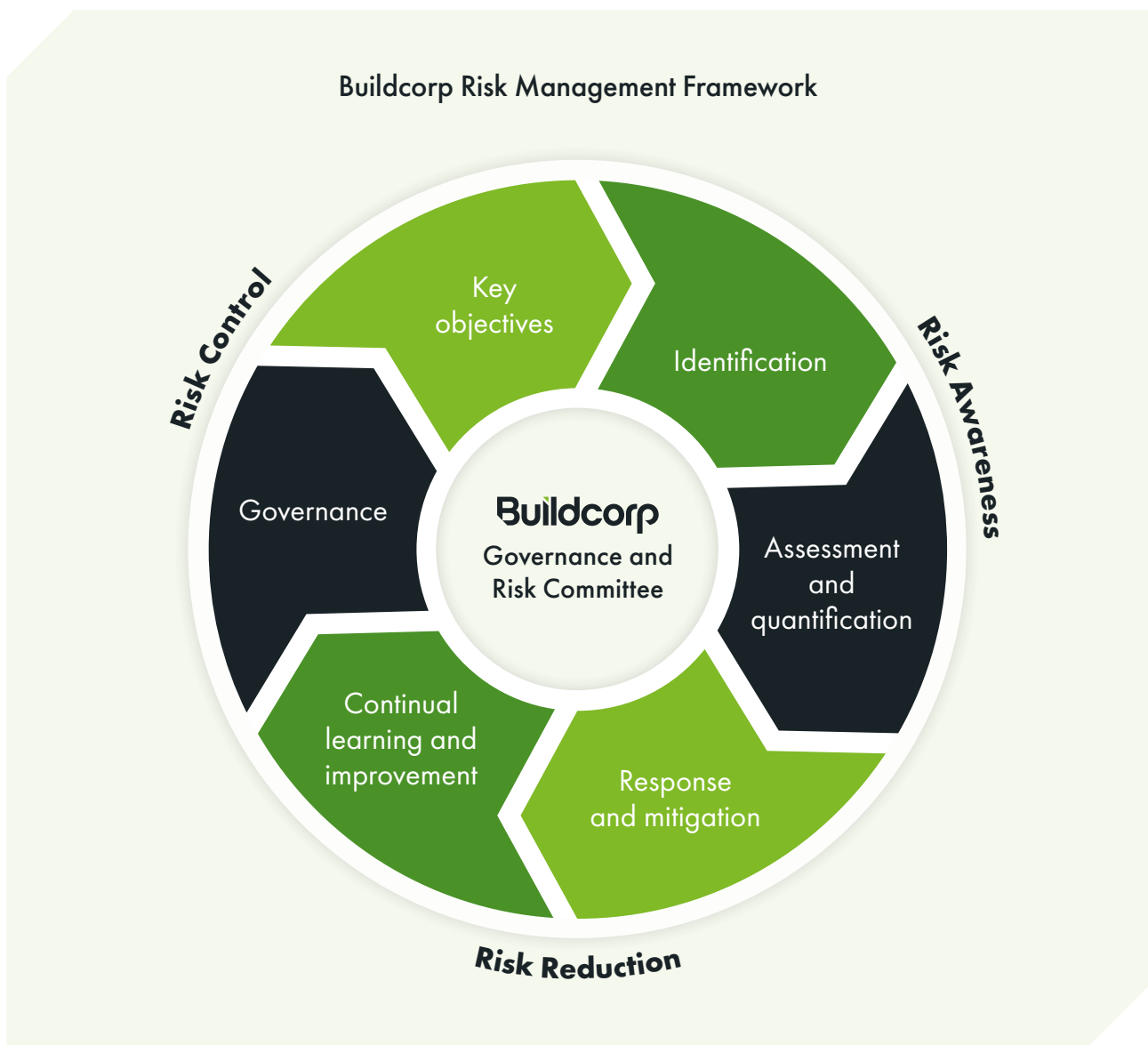
As these are latent risks, by being able to cross reference our spend by category against likelihood, we have been able to better distinguish and prioritise risks and opportunities to ensure our collective compliance on Buildcorp projects.

<sup>1</sup> Property, construction and modern slavery: Practical responses to managing risk to people, KMPG & Australian Human Rights Commission (2020)

# How we prevent and mitigate the risk of modern slavery

## Governance

The Buildcorp Governance and Risk Committee is responsible for overseeing our governance and risk. Our Modern Slavery Management Framework has been developed by the committee to prevent, detect and respond to incidents of modern slavery abuses in our operations and supply chain. Buildcorp's Modern Slavery Working Group oversees the implementation of the framework, which is underpinned by our policies and procedures which are reviewed annually to ensure compliance with the Act.



## HOW WE PREVENT AND MITIGATE THE RISK OF MODERN SLAVERY *(continued)*

### Policies

The following policies outlines Buildcorp’s commitment and expectations in relation to modern slavery.

Policy	Purpose
<b>Supplier Code of Conduct</b>	Sets Buildcorp’s minimum standards of the conduct of our subcontractors and suppliers in the areas of labour, human rights, integrity, ethics, health, safety, environment, and tax compliance.
<b>Standards of Business Conduct</b>	Provides guidance on the expected behaviour of all Buildcorp employees.
<b>Anti-Slavery Policy</b>	Details Buildcorp’s commitment to respecting the human rights of every person involved in our operations, supply chain and communities.
<b>Anti-Bribery Policy</b>	Details Buildcorp’s zero tolerance to any form of bribery or corruption as we conduct our business and operations.
<b>Whistleblower Policy</b>	Provides a reporting framework through which Buildcorp employees, subcontractors, suppliers and members of the public are able to report instances of actual or suspected unethical or unlawful conduct, without fear of reprisal.
<b>Sustainability Policy</b>	Outlines Buildcorp’s commitment to developing our business sustainably by effectively managing economic, environmental and social risks and opportunities.

### Due diligence and management controls

Buildcorp encourages a collaborative approach in working with project partners and suppliers on implementing risk mitigation measures in our supply chain. We recognise that due diligence enquiries with our subcontractors and suppliers is the single most important step we can take to avoid, identify and remediate instances of modern slavery in our operations and supply chain.

To address this, we:

- ▼ Issue a modern slavery assessment to be completed prior to appointment as a supplier or subcontractor
- ▼ Integrate Modern Slavery questions in our pre-Tender interview
- ▼ Online training compulsory for all Buildcorp employees
- ▼ Onsite induction which covers Modern Slavery issues and what to look out for
- ▼ Site and office signage promoting whistle-blower details and signs of what to look out for, and
- ▼ Review and update policies and procedures on an annual basis.



We recognise that due diligence enquiries with our subcontractors and suppliers is the single most important step we can take to avoid, identify and remediate instances of modern slavery in our operations and supply chain.



# Measuring the effectiveness of our modern slavery framework

## Our progress 2020-2021

The principal focus during this reporting period was to develop and implement a structured approach for identifying modern slavery risk in the supply chain. In addition to hiring a resource who now has ownership of our Modern Slavery program of work, we have completed or progressed on all of our key actions identified in our 2020 Modern Slavery Statement.

Key actions	Progress	Detail
Develop a purpose built online modern slavery training module	Completed	Our online training module was developed and implemented for all employees, in March 2021. Since then, 443 completions have been logged through our learning management system.
Providing periodic modern slavery awareness training for Buildcorp employees	Completed	Site managers and supervisors have all completed additional face to face training so they can deliver Modern Slavery training through our on-site induction process.
Establishing an employee-based Modern Slavery Working Group	Completed	We have a five person Modern Slavery Working group which meets on a quarterly basis and as needed, who are responsible for the design, implementation and monitoring of our Modern Slavery compliance program.
Commissioning an independent modern slavery risk assessment	Completed	We engaged Edge Consulting to undertake a gap analysis and supply chain assessment which helped us identify where we needed to strengthen our procedures and policies to better address the risk of Modern Slavery.
Implementing modern slavery awareness campaigns for subcontractors on project sites	Completed	A Modern Slavery section has been included in our site induction pack and signage highlighting the risk of Modern Slavery, what to look out for and how to report it is posted on all of our work sites and offices.
Implementing initial modern slavery due diligence enquiries at the time of subcontractor engagement	Commenced	We are currently trialling engaging with suppliers and subcontractors at the pre-tender award stage to address Modern Slavery concerns.
Including components of our modern slavery framework in our project management planning system	Commenced	We have commenced integration of Modern Slavery requirements into our project management systems. This work is due to be completed in early 2022.
Initiating a collaborative approach with competitors to standardise modern slavery due diligence processes with subcontractors	Commenced	We have in principle agreements with four Tier 2 peer companies to work together to progress supply chain mapping of our shared subcontractors, with a view to developing an easier system for SMEs to be able to voluntarily comply with the Act.
Reviewing the use of our grievance mechanism to ensure it is effective	Completed	The whistle blower structure has been reviewed and in order to increase privacy and confidentiality we are updating our system in December 2021.

## MEASURING THE EFFECTIVENESS OF OUR MODERN SLAVERY FRAMEWORK (continued)

### Reporting of human rights concerns

Under our Anti-Slavery policy, Buildcorp has a whistle-blower mechanism that allows employees, subcontractors, suppliers, clients and members of the public to anonymously report instances of actual or suspected modern slavery associated with the Company's operations. There were no concerns reported or raised during the 12 months prior to the publication of this statement.

### Meeting client's expectations

In 2021 we have been invited to complete a Modern Slavery Assessments across a number of platforms including Informed 365, SEDEX and EcoVardis. These platforms have our Modern Slavery Framework and its associated policies and procedures to be shared with, and assessed by, several of our clients. While the EcoVardis final assessment is pending at the time of writing, and Informed 365 is not rated, our SEDEX Supplier Management Controls were rated 4.4/5. While there is still some room for improvement, this rating provides us with a certain level of confidence that the procedures and controls we have put in place are working and can only be improved upon.



“

There were no concerns reported or raised during the 12 months prior to the publication of this statement.

# | Continual improvement FY22

“

We hope that working together will make mapping of complex supply chains easier for all parties, thus reducing the burden on the much smaller companies.

## Action plan

Over the next 12 months we will build upon the progress we have made and continue to engage and educate our suppliers in relation to Modern Slavery.

This will include:

- ▶ Providing additional education materials to our suppliers, including a frequently asked question, and links to a number of free resources such as The Walk Free Foundation, Anti-Slavery Australia, the Supply Chain Sustainability School and The Australian Government's Modern Slavery website.
- ▶ Extending our online learning platform for use by suppliers and their employees to assist with understanding and training in SMEs
- ▶ Implement compulsory annual completion of Modern Slavery assessment for all contractors
- ▶ Introduce Modern Slavery compliance rating in our Project Performance Review process
- ▶ Digital integration of Modern Slavery Assessments into our online Tender process to improve access to relevant information.

## Working in collaboration

While recognising the impact an industry approach delivers, feedback received from our subcontractors, most of whom are not required to comply with the Act, is that they simply do not have the administrative resources required to complete Modern Slavery Assessments requested by all their customers. After looking at the more complex platforms, that have been developed by the Tier 1 companies and for-profit organisations, we have initiated a Tier 2 construction company consortium to work together on addressing Modern Slavery supply chain mapping with our common subcontractors. We hope that working together will make mapping of complex supply chains easier for all parties, thus reducing the burden on the much smaller companies.

The consortium also serves as a great way to facilitate knowledge sharing between like-minded organisations and develop unified approaches to enabling consistent uplift in the Industry.

# Consultation and approval

## Our approach

We undertake a Group-wide approach to managing modern slavery risk within our business and supply chain which means that all reporting entities listed below are embedded within our program of work. In regard to our Modern Slavery response, all business units within those are addressed by a whole of group function. Furthermore, our policies, procedures and practices apply to the entirety of Buildcorp Holdings.

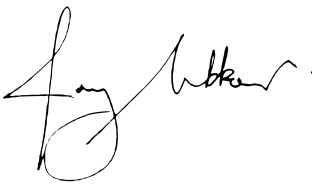
## Approval

This statement has been prepared by Buildcorp Holdings Pty Limited ABN 51 140 508 685, and applies to its wholly owned entities:

- |  |                 |
|--|-----------------|
| ▼ Buildcorp Group Pty Limited                      | ACN 091 336 168 |
| ▼ Buildcorp Infrastructure Solutions Pty Limited   | ACN 099 362 286 |
| ▼ Buildcorp Contracting                            | ACN 003 922 825 |
| ▼ Buildcorp Interiors Pty Limited                  | ACN 073 932 788 |
| ▼ Buildcorp Securities and Investments Pty Limited | ACN 055 880 585 |

It had been developed in accordance with the requirements of the Australian Modern Slavery Act 2018 (Cth) (the Act). It describes how Buildcorp has addressed modern slavery risks in our in the year ended 30 June 2021.

Approved



**Tony Sukkar AM**

Sole Director

Buildcorp Holdings Pty Limited

10 December 2021

# | Appendix A

## Mandatory criteria for modern slavery statement

A modern slavery statement must, in relation to each reporting entity covered by the statement:

Requirement	Addressed under
(a) identify the reporting entity; and	Structure, operations, and supply chain
(b) describe the structure, operations and supply chains of the reporting entity; and	
(c) describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls; and	Risk of modern slavery in our business
(d) describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes; and	How we prevent and mitigate the risk of modern slavery; and, Continual improvement FY22
(e) describe how the reporting entity assesses the effectiveness of such actions; and	Measuring the effectiveness of our Modern Slavery framework
(f) describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a statement under section 14—the entity giving the statement;	Consultation with reporting entities
(g) include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Refer to our Policies section for links to all relevant documents.

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**Buildcorp**