



iNTRC

Modern Slavery Statement

2021-22

INTREC MANAGEMENT PTY LTD

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*“Our Difference
is our People”*

INTREC Management

There are seven mandatory reporting criteria required by the Modern Slavery Act 2018 (Cth):

| | | |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
| 01 | Identify the reporting entity | 04 |
| 02 | Describe the reporting entity's structure, operations and supply chains | 05 |
| 03 | Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls | 08 |
| 04 | Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes | 09 |
| 05 | Describe how the reporting entity assesses the effectiveness of these actions | 10 |
| 06 | Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls with any entities the reporting entity owns or controls | 11 |
| 07 | Any other relevant information | 11 |

REGISTER FOR REVIEW

| Revision | Date | Description of Amendments | Amended By |
|----------|------------|------------------------------------------|------------|
| 01 | 03/09/2019 | Document created | CB |
| 02 | 31/08/2021 | Reviewed & updated to meet ABS criteria. | BF |



We pay respect to the Cammeraygal People of the Eora Nation, the Jagera people of Turrbal and the Boon Wurrung and Woiewurrung (Wurundjeri) peoples of the Kulin Nation; of the lands on which our company is located and conducts business. Through our endorsed Reconciliation Action Plan (Reflect), we recognise the important roles Aboriginal and Torres Strait Islander peoples perform in our business.

01 Reporting Entity

We respect the principle of non-discrimination as a fundamental one in human rights law - all human rights should be enjoyed by everyone regardless of factors such as race, sex or disability.

INTREC acknowledges our moral, ethical and legal obligations to combat slavery, forced and compulsory labour and human trafficking as defined by the Commonwealth Modern Slavery Act 2018 and more broadly the Australian Human Rights Commission Act 1986 and our specific obligations under the Racial Discrimination Act, the Sex Discrimination Act, the Disability Discrimination Act and the Age Discrimination Act.

To this end, we have implemented a Modern Slavery policy (INTREC reference PO27) and taken steps to improve transparency in our supply chains through our engagement with suppliers and subcontractors.

Implementation of our obligations is managed through:



Clear and unambiguous policies to support the abolition of modern slavery.



Training, awareness and ongoing review.



Prequalification of suppliers and subcontractors who have aligned values and systems of work to INTREC.



02.1

Structure, Operations & Supply Chains

INTREC is a privately-owned Australian company, specialising in construction, commercial fitouts and building refurbishment. With our resources and expertise, we deliver projects up to \$50m with successful outcomes to our varied and valued Client base.



Over 160 employees across Australia



Founded in 1996, INTREC has been operating for over 25 years



Delivering projects up to \$50 million



Operating in 4 regions, New South Wales, Victoria, Queensland & Australian Capital Territory

Founded in 1996, INTREC has established a reputation for outstanding service, quality and reliability.

Led by INTREC’s founders Clint Bragg and Thomas Ho, our professional team are highly motivated and committed to delivering projects to the highest standard possible. Our extensive experience includes all aspects of the building process and working under all forms of contract.

Our key focus is developing a comprehensive understanding of our Client’s needs, as well as deliver value and excellence in every aspect of our service. We seek to build long-lasting partnerships with our Clients, staff and suppliers.

INTREC is currently delivering projects throughout the Eastern Seaboard through its offices in Sydney, Brisbane, Melbourne and Canberra.

We have experience in all forms of project delivery, including Lump Sum, Early Contractor Involvement, Design & Construct, Construction Management, Cost Plus and Guaranteed Maximum Price methods.

We are focused on understanding our Client’s needs and the key project deliverables. We aim to achieve excellent Client satisfaction through the implementation of our ‘best practice’ systems, which are certified to the following standards:

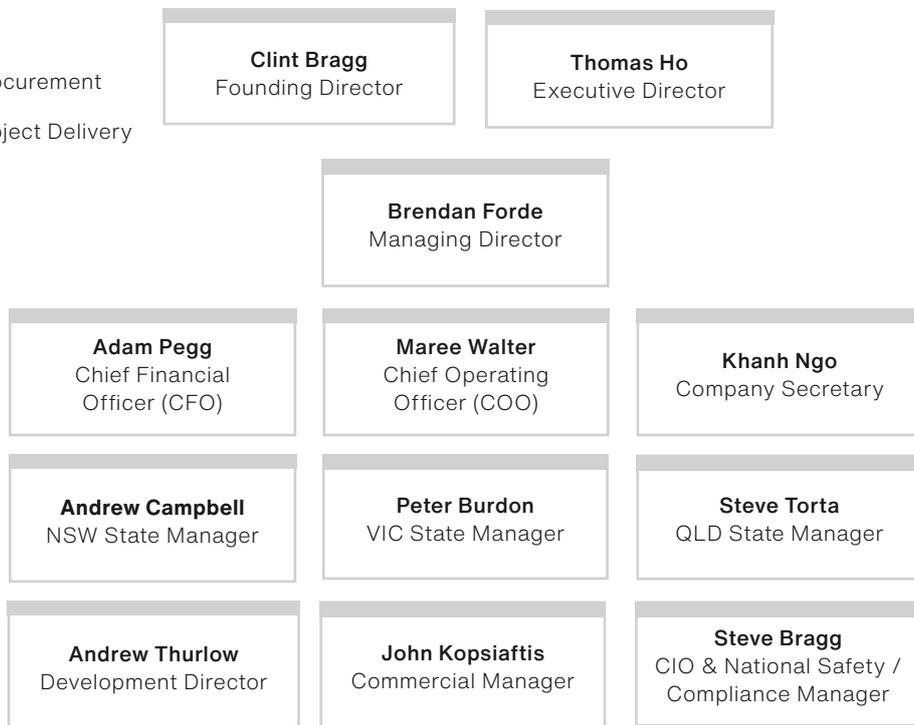
- AS/NZS ISO 9001:2015 – for our Quality Management Systems
- AS/NZS ISO 14001:2015 – for our Environmental Management Systems
- AS/NZS 4801:2001 – for our Occupational Health & Safety Systems

In addition, INTREC meets the National Code of Practice for the Construction Industry for Federally funded projects. We are also a member of the Green Building Council of Australia and have completed several 4+ and 5+ Green Star Projects.

We have built, developed and maintained many long-standing relationships with numerous Clients nation-wide, which is a testimony to our professional capabilities in interior refurbishment and construction projects.

02.2 Our Business Structure

- Management
- Support
- State Procurement
- State Project Delivery



02.3

Our Supply Chain

INTREC work in a collaborative, transparent manner and dedicate the necessary resources to ensuring communication channels will be established and maintained with our supply chain of sub-constructors, service providers and material suppliers.

We receive services across multiple procurement categories including and not limited to the following:

- Preliminaries
- Consultants & Surveyors
- Demolition
- Asbestos
- Excavation
- Concrete & Formwork
- Masonry
- Waterproofing
- Steel & Metalwork
- roofing
- Cladding / Facades
- Windows
- Doors
- Wall & Ceiling Lining
- Carpentry & Joinery
- Rendering
- Tiling & Floor Coverings
- Painting & Graphics
- Hydraulics (Plumbing)
Security
- Electrical
- Lifts
- Fire
- Furniture & Fixtures
- External Works
- Cleaning

INTREC have established an extensive base of long serving subcontractors and suppliers in alignment with our social responsibility practices, both local and all across Australia.



03

Risks of Modern Slavery Practices

INTREC has a clear position that we and our suppliers and subcontractors will not engage in behaviour which supports, encourages or allows slavery, forced or compulsory labour or human trafficking.

INTREC's primary source of risk resides in our multi-layered supply chain of labour, suppliers and subcontractors. The complexity can result in lack of visibility of employment practices that don't comply with legislative obligations. Services such as cleaning and security identify as high risk modern slavery industries.

Despite the complex construction supply chain, INTREC ensure all suppliers and subcontractors are prequalified to ensure alignment with our Code of Conduct (refer INTREC Procedure 010 – Code of Conduct, F19 Contractor Evaluation and 026 – Subcontractor Selection).

All subcontractor employees are required to be inducted prior to working on INTREC sites. This induction takes into account the needs and obligations of INTREC and those of INTREC's clients. This induction process includes mandatory review and adherence to the subcontractor employee holding the appropriate tickets, licenses and trade memberships for the jurisdiction in which the work is being undertaken and in accordance with INTREC's Safety and Environmental Management Plan.

INTREC respects the rights of freedom association for subcontractor employees and will ensure that we uphold our statutory obligations in relation to Right of Entry and the rights of the individual employees.

Other areas of risk include Product and service risk, Geographic Risk and Entity Risk.



04

Actions to Assess and Address Risk

INTREC projects are delivered through the use of subcontract labour which is where our primary source of risk resides. The success of INTREC is contingent on the relationship with and quality of our suppliers & subcontractors.

We ensure compliance through the use of specific Modern Slavery contractual terms in our engagement agreements and in formal and informal reviews with key suppliers and contractors. We conduct a risk assessment each project taking into account exposure to modern slavery and where appropriate, apply formal processes to ensure we do not allow exposure.

Our Due Diligence Actions:

- Conducting an independent risk assessment to ensure compliance with all applicable modern slavery laws and take steps to meet standards in relation to modern slavery.
- Using a modern slavery questionnaire at subcontractor selection and inductions.
- Request the right to audit our subcontractors for compliance.

The primary evaluation factors are:

1. Alignment with the INTREC Code of Conduct
2. Employee training and development
3. Technical competency
4. Safety
5. Quality
6. Organisational alignment and management (of the subcontractor) and relationship management

In addition, INTREC has a **Whistleblowing Policy** to support the awareness, reporting and remediation of activities which may be contrary to the behaviours defined in our policies and procedures.

At pre-employment for both sub-contractors and full-time employees, INTREC focuses on two primary components being cultural fit and technical (functional) competence. Cultural fit and alignment of personal values are the strongest indicator of potential success for the employee in INTREC and will have the greatest favourable impact on the success of INTREC. At commencement of employment, all INTREC employees are subject to a mandatory induction which details all company policies and procedures. Online testing is then conducted to measure understanding of company policies and procedures.

During employment, all employees are required to undertake mandatory online refresher training on a six monthly or annual basis in relation to application of policies and procedures. Management review is undertaken monthly on a rolling basis to ensure that policies are current and reflect our broader obligations and the needs of our employees, subcontractors and INTREC.



05

Effectiveness of these Actions

CONTINUOUS AWARENESS AND DISCOVERY

We will identify and mitigate risk by:

- Identifying and assessing potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistleblowers.
- Where appropriate, undertake audit and review of individuals and entities who are deemed to present a risk to our business in relation to modern slavery.

OUR CONTROLS

All INTREC Projects operate under the framework of a **Project Specific Management Plan** which assesses specific items of risk and risk mitigation.

Minimum Wage Requirements – as detailed above, all INTREC Policies and Procedures are available for review on request. INTREC employees are engaged on individual contracts of employment which reflect (as an absolute minimum) our obligations as imposed by the National Employment Standards and the Fair Work Act in addition to State based statutory obligations.

All INTREC employees undertake role specific training (based on a verification of competency model) in addition to periodic formal reviews which include an individual learning and development plan. Sample employment contracts, reviews and learning and development plans are available on request.

INTREC suppliers and subcontractors are engaged on a formal agreement which requires compliance with statutory obligations in relation to employment standards safety and human rights.

We measure and monitor feedback and complaints through the INTREC Whistleblower process and undertake risk-based audits as required.

ASSESSING EFFECTIVENESS

We assess risk by sector on a project basis:

| | |
|--------------------------|--------------------------------------------------------------|
| Sector risk | Commercial Construction (Subcontractor Engagement) |
| Product and service risk | Building Products (country of origin clarification). |
| Geographic Risk | Operations in New South Wales, ACT, Victoria and Queensland. |
| Entity Risk | INTREC and INTREC Clients. |

We continue to undertake training of all employees in the application of INTREC policies and procedures including our obligations in relation to modern slavery.

We continue to induct all new employees to ensure awareness of the application of INTREC policies and procedures including our obligations in relation to modern slavery.

We communicate and engage with suppliers and subcontractors by way of project reviews to ensure awareness of the application of INTREC policies and procedures including our obligations in relation to modern slavery.

We require a Modern Slavery Compliance obligation in our subcontract agreements.

We undertake incident reviews for each occurrence in relation to potential or actual breach of our obligations in relation to modern slavery.

06

Process of consultation

INTREC include a review of our Modern Slavery obligations in our third party surveillance audit process annually.

We also report twice per year to our Directors and Management Board in relation to status of our programmes and initiatives to improve our performance. Reporting performance measures include:

- Modern slavery awareness module completed on Litmos as % of employees
- Number of complaints received through our Whistleblower process
- Number of subcontracts let which require modern slavery obligations to be met and
- Satisfactory audit completion in the reporting period



07

Other relevant information

NEXT STEPS

INTREC will continually review and audit our due diligence process, ensuring our policy is updated annually with any potential and future changes that may arise.

Our Management team will continue to educate our internal and external team of our policies and any improvements necessary. It is important for us to continually identify any risks that may not have occurred yet and ensure these are covered in our due diligence and remediation process.

This statement was approved by the board of INTREC Management in their capacity as principal governing body of INTREC Management Pty Ltd on 30 August 2021.

This statement is approved and signed by Brendan Forde in his role as the Managing Director of INTREC Management on 31 August 2021.

A handwritten signature in blue ink, appearing to read 'B. Forde', written over a light blue horizontal line.

Brendan Forde

*Managing Director of
INTREC Management Pty Ltd
31 August 2021*

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