



**Modern
Slavery
Statement**

FY24

“ We will not tolerate any forms of Modern Slavery in our direct business activities and will work with our subcontractors and suppliers to identify and address instances of Modern Slavery that may exist in the construction and infrastructure supply chains.”

- Extract from the Joss Modern Slavery Policy Statement

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Structure, Operations and Supply Chains

Colin Joss and Co Pty Ltd (Joss, the Company) is a family-owned business based in Albury NSW. Originally a Partnership established in 1975, it was converted to a limited liability company in 1988.

Since its inception, Joss has established itself as one of regional Australia’s premier construction and facility management companies, servicing both government and private clients throughout New South Wales, Victoria and the Australian Capital Territory.

The growth of the Company can be attributed to the reputation Joss has developed as a trusted and experienced contractor capable of successfully delivering complex and challenging projects.

In response to the changing needs of the industry and our clients, Joss has established two main divisions within the business: Joss Construction and Joss Facility Management, to enable the delivery of specialised services reflective of the experience and skill sets of our staff.

Employee Breakdown	
Total Employees	2,485
Female Employees	1,575
Indigenous Employees	178
Employees with a disability	94



The Head Office, Depot and Workshop are all located in Albury. The Company also operates 13 regional offices throughout New South Wales and the ACT.

During the 2022/2023 financial year (FY23), a parent entity was established that is 100% owned by the Joss family. All trading operations are done through the Company, and all employees are employed by the Company.

The Company has no subsidiary entities and does not control any other entity.



Joss Construction

The commercial construction, civil and infrastructure division of Joss complete a wide variety of projects including commercial and industrial buildings, educational, sporting and health facilities, residential property development, refurbishment and renovation of existing buildings, roads, water treatment and services infrastructure works for a variety of customers including all levels of government and private enterprise. The division employs a permanent team of qualified and experienced personnel who plan, co-ordinate and manage subcontractors to deliver projects under Managing Contractor, Lump Sum, Early Contractor Involvement, Design and Construct, or Design Construct and Manage contract arrangements.

Joss Construction's supply chains may include consultants, subcontractors, material suppliers and indirect suppliers.

 **20**
Projects Completed
during the period

 **1,577**
Construction Subcontractors
& Suppliers



Joss Facility Management

The Facility Management division of the Company was established primarily to service NSW Government facilities, but has since diversified to provide planned maintenance and reactive maintenance, cleaning, refurbishment works as well as deliver smaller construction projects for all levels of government and private enterprise.

Over the past 26 years, the division has established a base of approximately 1,500 prequalified Subcontractors who, under the co-ordination, supervision and management of Joss, undertake maintenance and servicing works across more than 14,000 sites on behalf of our clients.

One of Joss Facility Management's clients adopted a new maintenance model at the start of FY24 where subcontractors work for, and are paid directly by, the client with Joss performing what is effectively a consultant role assisting with the administration and inspection elements of maintenance tasks on a further 650 sites.

Unlike the Asset Maintenance component of the Facility Management division, the cleaning works undertaken by the Company is undertaken predominantly by employees, with specialist subcontractors only utilised to undertake complex periodic work.

Joss Facility Management's supply chain includes subcontractors, material suppliers, and indirect suppliers.

 **14,538**
Properties Serviced during
the year.

 **1,562**
Facility Management
Subcontractors & Suppliers

Risks of Modern Slavery in the Operations and Supply Chains

During the FY24 we continued to undertake assessments of our Subcontractors and Suppliers utilising various approaches to match the type, volume and risk of the various services:

Operations

The scope of operations undertaken by the Company did not change from the previous financial year and Joss have again assessed the risk of Modern Slavery within our Operations to be low.

A documented assessment was undertaken by the Joss People & Culture team utilising an internally developed tool. The assessment focusses on the identification mechanisms for Child Labour, Forced Labour, Bonded Labour, Human Trafficking and Employment Conditions as well as Grievance and Redress Mechanisms. This Assessment is currently being undertaken annually.

In addition to this documented assessment, the following factors supported the determination of a low risk rating:



The Company employs a qualified and experienced team of human resources personnel that have created, implemented, monitor and continually develop our robust employment policies and procedures. These systems have been established to both ensure and demonstrate compliance with legally mandated employment conditions and awards across our entire workforce.



The Company has established a diverse and layered approach to site inspections comprising of senior management inspections, Site Manager/Supervisor inspections and HSEQ personnel inspections/audits to monitor work practices on our sites. Joss also periodically engage the services of external consultants, predominantly Health and Safety Consultants, to inspect our sites and review our systems and practices.



As a result of the industries we work in, and the clients we perform work for, Joss is regularly subject to external assessment of our workplace practices and employment arrangements. These assessments may be by external health and safety auditors for state or territory prequalification schemes, third party surveillance audits of our Certified Management Systems by SAI Global Assurance Services, client initiated audits and visits by the NSW Code Compliance Unit, ACT's Secure Local Jobs Certification, annual financial audits required by ASIC or periodic state government payroll tax audits.



For more than two decades, Joss has utilised consultation as a mechanism to identify issues, obtain feedback, disseminate information, and explore improvements. The Company's support of a Consultation Committee made up of elected Health and Safety Representatives from the various workgroups, combined with documented and communicated Grievance Procedures, facilitates a worker safety net that may be utilised directly, or anonymously.

In addition to the documented self-assessment, these entrenched practices and mechanisms all assess for common indicators of modern slavery.

Supply Chains

During the reporting period, Joss continued to utilise a combination of approaches to assess, monitor and educate our supply chains. One of which is a Modern Slavery Survey of subcontractors and suppliers providing goods or services on projects when the value of the procurement is more than \$50,000 and who had not previously completed a questionnaire. This resulted in 53 surveys, which is a lower figure due to the higher number of surveys received in previous years.

The surveys for the period identified:

- Only one of the businesses in the assessed supply chain were subject to the Modern Slavery Legislation and only two others have a turnover greater than \$50M p/a.
- 1,717 workers were employed by those assessed.
- Although quite a few businesses had accreditations and certifications in various schemes and standards, none of them related to responsible sourcing.
- Only 20 businesses (less than 40%) had a policy, process or other commitment to eliminate Modern Slavery.
- Only 7 businesses (less than 15%) had undertaken any form of modern slavery training despite details of free available resources being provided by Joss.
- 26 businesses were aware they were utilising imported materials.
- Materials or products were being imported by 18 businesses directly, representing an increase of almost 600% over last year's survey results.
- Common imported materials included steel, electrical equipment, flooring products, door and window furniture, fixtures, fittings and sealants. No new mechanical contractors were assessed this period, but we are aware the majority of mechanical equipment nominated in our contracts and installed, is imported.
- The most recurrent countries listed where products were sourced from overseas included China, Germany, America, Taiwan, Austria, India, Italy, England and South Africa.
- 100% of businesses confirmed that if modern slavery was identified or suspected in an overseas supply chain, they would look at phasing to alternative suppliers/products to assist in eliminating modern slavery.

As identified in the Global Slavery Index 2023, Australia imports US\$17.4b worth of at-risk imports with the construction industry contributing at some level to the import of electronics, garments and textiles out of the top 5 at-risk imports and also other at-risk products such as timber (ranked 6).

These surveys, coupled with data collated over the previous four years, and external information available such as the Global Slavery Index 2023, it is reasonable to view that Joss does have exposure to modern slavery in our supply chains via the engagement of subcontractors and consultants, as well as through the procurement of goods and materials (plant, equipment, vehicles, electronics, consumables and building materials).

Case Study 1

Banking Anomaly

Joss was contacted by the fraud department of a big four bank following concerns regarding a name mismatch and other undisclosed concerns on a person's bank account.

It was reported that a number of payments had been made through our payroll system to a beneficiary account number that Joss had not paid to previously. Joss was required to check that the beneficiary account details were correct.

A desktop audit was initially completed and appeared to be accurate. To confirm this accuracy, verbal checks were also completed with the intended beneficiary over the phone, however due to a language barrier and large geographical distance, further confirmation was required without alarming the employee or potential fraudster.

A member of Joss' People & Culture Department arranged a face-to-face meeting with the employee and was able to verify the accuracy of the accounts and clarify any anomalies.

Although the concern was unfounded, it was possible that a fraudster was controlling or monitoring the accounts or emails of the beneficiary, so critical attention to detail was required throughout the process. Similarly, this was a good example for our recruiting and onboarding personnel of the importance of following documented procedures and attention to detail. It was also reassuring that our bank is also checking and monitoring for anomalies.

Subcontractors and Consultants

This year represented the fourth year of our supply chain mapping through the use of Modern Slavery Surveys. Due to the nature of the works we perform (pricing and delivering different projects and maintenance tasks around NSW, Victoria and the ACT), Joss is constantly engaging different subcontractors. To understand this element of our supply chain at the outset, we assessed 50% of our subcontractors by value in the first 12 months. Then, for the past three years, we initiated assessments for subcontractors who had not previously been assessed, or had been assessed more than three years prior and had subcontracts in excess of \$50,000. This approach is not without its limitations, but it provides a practical means to assessing a constantly changing supply chain.

The data that has been collated in FY24 is consistent with previous years. We are generally engaging with businesses classified as Small and Medium Enterprises (SME's) in predominantly regional areas. As a result, it is often from the information provided with our modern slavery surveys, or the tools referenced within them, that has made our subcontractors aware of the existence of Modern Slavery and what to do if it is identified or suspected in Australia or internationally.

This year saw the reassessment of 25 subcontractors and allowed us to gauge if they were more aware of Modern Slavery and had responded to this awareness in any way. The results identified that:

- 7 subcontractors who previously did not have Modern Slavery or Human Rights Policies had developed them over the past 3 years
- Only one firm indicated that they had undertaken training on Modern Slavery since they were initially assessed by Joss
- Of the businesses that had previously identified that their employees did not have a written employment contract (in a language they understood, where terms of employment including wage rates and hours of work are clear), all but 2 indicated they had rectified this oversight
- Consistent with the rest of the survey results, two subcontractors who earlier indicated they did not import materials themselves are now importing materials directly from overseas.

In previous Statements, Joss has raised the economic and social impacts that Covid-19 and protracted conflicts around the world have had on our industry. Manufacturing and distribution of products is directly impacted but also these international events have been found (as reported in the Global Slavery Index 2023) to be a risk multiplier impacting on employment, education, unsafe migration, breakdown in the rule of law and loss of social support networks. These survey results confirm a growing awareness and effort, albeit with limited success, by businesses to source locally manufactured products and materials.

Joss continues to monitor insurance arrangements and declarations relating to wages and entitlements, supervision on our sites and structured inspections provide a level of assurance to the correct employment practices by our subcontractors.

As a result, although a low possibility, Joss recognises that within the subcontractors we engage and their supply chains, the potential exists for practices that may lead to Modern Slavery.




Goods and Materials

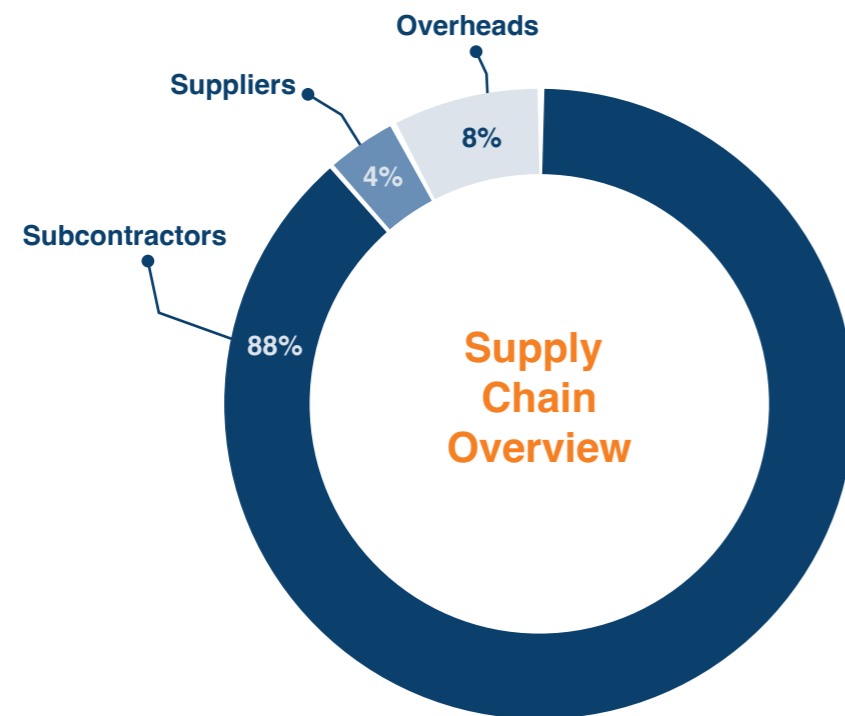
Unlike tier one contractors within the industry, Joss does not procure major elements of our construction projects ourselves. Directly purchased goods and materials represents only a very small component of the Company's expenditure (less than 4%). The Company does however procure some items directly, with vehicles, small plant and equipment, cleaning consumables and IT equipment being the major contributors to this spend. Although not significant, uniforms and apparel also represent a portion of expenditure.

As a building and maintenance contractor, building materials, plant and equipment are utilised extensively to deliver the projects we construct and the services we provide. Although the majority of materials, plant and equipment are sourced by subcontractors, this represents secondary levels of our supply chain. The surveys of our own immediate subcontractors and suppliers confirmed the use of imported materials and, although again we have not determined any specific evidence of transgressions, it would be naïve to discount the potential existence of modern slavery in some portion of the supply chain.

Joss is aware that the three predominant manufacturers of its directly procured IT equipment (Hewlett Packard, Apple and Samsung) have all acknowledged the potential of modern slavery in their supply chains and the Company shall continue to monitor the steps they are taking to eradicate its prevalence.


99.9% of our Direct Spend is with Australian Organisations


All of our International Direct Spend is with the USA



Case Study 2

Design Consultants

As a building and maintenance company Joss is regularly interacting with design consultants, sometimes working under their direction and sometimes engaging them to undertake design work on our behalf as part of a design team.

Of the Modern Slavery Surveys conducted by Joss on design consultants, the responses were very professional and diplomatic in outlining, what we found to be, very little awareness or action with regard to modern slavery.

Following this observation, Joss representatives again took the opportunity to engage directly with design consultants, conducting phone interviews and during networking at industry workshops and seminars. These discussions confirmed our concern that one of, if not the main opportunity to have significant impact on minimising the risk of supporting modern slavery in our supply chains, is through the careful selection and nomination of products in design documents. This is currently often being missed because of the lack of awareness around modern slavery, created by the nature of consultancy services being a relatively low turnover element of construction, compared to the head contractor or even subcontractors.

One of the architects we interviewed had no policy, no training, no procedures and their only awareness had been in the engagement agreement issued to them by Joss. Outside of Joss, none of the firm's clients had ever brought up modern slavery, nor encouraged careful material selection to mitigate modern slavery risks in the supply chain.

Joss had incorrectly presumed that Industry bodies would be providing education, assistance, tools and resources to support Architects and other designers, but very few, if any, design consultants would ever meet the \$100M trigger in the Federal Modern Slavery Legislation and as a result there is no pressure on this pivotal industry element from within to drive change or even awareness.

Another surprising observation that came to light during discussions with design consultants was the increase in the use of overseas drafting services. Although this does not automatically indicate modern slavery, and the likelihood is very low given the education, equipment and communication required to do this, it is taking what was once work performed down the road, to offshore and out of view.

As a result of these learnings Joss shall further the existing modern slavery clauses within consultant agreements. Designers will be expected to provide a statement outlining the investigations and actions they have taken to minimise the risk of modern slavery in the supply chains for the products and materials they specify.

Actions taken to assess and address these risks

During the year Joss continued to refine and improve the use of our modern slavery risk assessment processes. Feedback from our Modern Slavery Consultation Group identified the need to start revisiting subcontractors and suppliers still utilised by Joss that may have completed our survey in earlier years. This approach allows us to determine if subcontractors and suppliers have taken steps to inform themselves, set policy and begin implementing practices within their purchasing to minimise the potential for modern slavery in their supply chains. This information, following analysis, can now be used to further guide our own procurement decisions.

As required by our current procedures, the Joss People & Culture Department undertook a documented internal assessment of our employment practices. There were no issues identified through this assessment, nor by the various levels of site inspections and audits undertaken as part of our regular systems implementation monitoring.

Modern Slavery Awareness training had been initiated in previous years for all staff in procurement positions, with key positions also participating in more advanced training opportunities. During this period, another internal training module was developed and rolled out to Supervisory personnel to assist them in identifying signs or indicators of modern slavery and how to report them.

The Modern Slavery Consultation Group again reviewed and provided feedback on the implementation of procedures that they assisted to establish. The Group generally felt that the procedures established proportional controls for each of the Company divisions that were reflective of their individual requirements, but also considered the following limitations:

- changing project needs and locations of construction works;
- the high labour elements of Facility Management and Cleaning; and
- 'like with like' or 'deemed to comply' requirements of a number of existing Facility Maintenance contracts.

In summary this included:

Construction and Civil	Facility Management	Joss Cleaning
Assessing, and in some cases re-assessing, all subcontracts and purchase orders over a set limit, the allocation of a risk rating and, depending on that risk rating, proceeding with procurement, escalation for further consideration or the identification of alternatives to eliminate or reduce the risk of supporting Modern Slavery to a lower level.	Due to the nature of the Facility Management works being predominantly labour intensive, Joss continued to utilise the extensive prequalification process coupled with contractual clauses, declarations, inspections, toolbox talks and audits to monitor and facilitate the identification of Modern Slavery issues.	The Cleaning division of Joss is characterised by a predominantly inhouse labour force undertaking contract works. Joss utilises a small number of specialist subcontractors (such as working at height specialists, electricians for equipment testing and repairs) and suppliers, and because of this the division utilised (in combination) the Modern Slavery Surveys, Modern Slavery Statements, site monitoring actions, offsite visits to supplier/subcontractor premises and subcontractor declarations to both identify and monitor modern slavery risks.

The effectiveness of these actions

The actions that Joss has undertaken during FY24 has continued to raise the level of awareness and commitment by ourselves and our supply chains, to pursue more sustainable procurement practices.

The implementation of a trigger to refresh existing supply chain information has allowed us to compare the levels of awareness and action taken by our suppliers and subcontractors over time. Their action appears to predominantly be in the areas of awareness and policy, however with these developments, like ourselves, procurement decisions become influenced and momentum can be achieved.

The information and analysis undertaken this year has also resulted in a drive to take more proactive action with our design consultants where informed decisions can be made at the outset rather than creating the need for secondary procurement reviews. At a documentation level, ethical sourcing could be examined, and details included in procurement documents to either identify research already undertaken or to preclude high risk sources. This would represent a single effective approach that is more efficient and can be enforced contractually.

The construction industry remains a very complex and diverse industry utilising raw materials such as timber and stone, electronics, fabrics and other products and materials that are essential to the industry, but also present a risk.

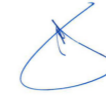
Joss continues to encourage industry bodies to pool resources in the areas of education and information sharing but also in order to create a larger more influential force that can exert additional pressure on supply chains to be transparent and source through responsible and sustainable methods. Companies such as ours that have their turnover achieved through the use of thousands of smaller subcontractors and suppliers, may adopt measures to raise awareness and even change procurement patterns to avoid higher risk procurement but this will have little or no influence without a consistent approach by everyone.

Joss has established milestones and KPI's within its own modern slavery strategy to assist in the monitoring and measurement of the actions and initiatives that it undertakes in order to determine if they are effective. For the FY24 all of the established milestones were achieved including:

- ✔ The instigation of secondary reviews on subcontractors and suppliers every 3 years, in order to gauge improvement in awareness and actions.
- ✔ The roll out of supplementary Modern Slavery training to supervisory personnel focussing on identifying the signs of Modern Slavery training. This training has been established with a 2 yearly refresher cycle.
- ✔ Modern Slavery Awareness training as part of their induction for all new employees who may potentially procure materials or services on behalf of the Company.
- ✔ Completion of the documented annual internal Modern Slavery Assessment and implementation of monitoring during Inspections and Audits.
- ✔ Assessment of the data obtained from our Subcontractors and Suppliers to assist in our decision making regarding subcontractor engagement and procurement.
- ✔ Interaction with industry bodies and clients to raise awareness of the potential of modern slavery practices in the manufacture of products and materials that may be nominated in designs, specifications, or contracts.

For the FY25, Joss shall continue to implement actions, report against milestones and KPI's, and identify further initiatives and outcomes in future Modern Slavery Statements. Concurrently, the Company shall continue to lobby industry associations to establish a consolidated approach to addressing modern slavery through the sharing of data or improved communication and transparency within contracts and specifications.

This Statement was approved by the Joss Board on 17th December 2024.



Paul Joss

Managing Director

19th December 2024



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