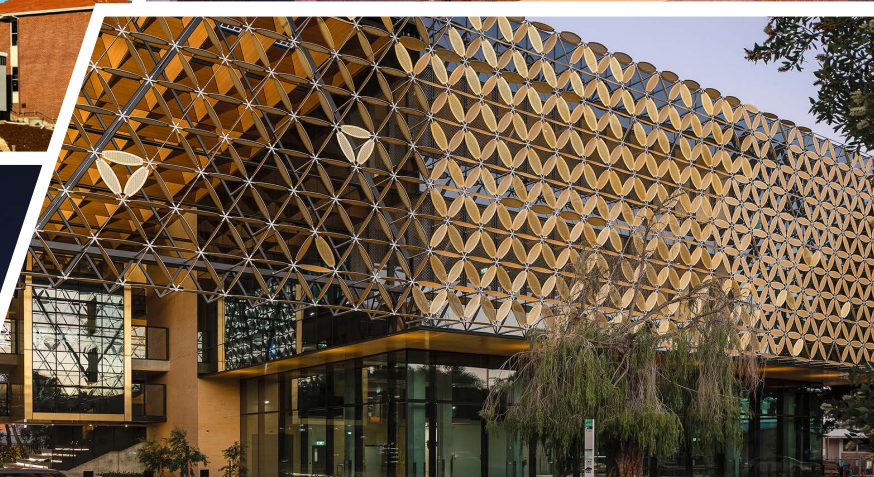




Perkins (WA) Pty Ltd Modern Slavery Statement FY 2019/2020



Perkins (WA) Pty Ltd (Perkins) is subject to the Modern Slavery Act (2018) (Cwth) effective 1st January 2019. This annual modern slavery statement is our first in accordance with the regulations. Perkins is committed to the upholding of individual human rights with our operations and other areas where we have influence or control there by adhering to the Modern Slavery Act (2018).

This Modern Slavery and Human Trafficking Statement is made pursuant to Modern Slavery Act 2018 and constitutes our statement for the financial year ending in June 2020. This Statement defines our approach in identifying and mitigating the potential risk of slavery and human trafficking within our organisation and supply chains.

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OUR BUSINESS

Perkins (WA) Pty Ltd (Perkins) is a commercial construction company headquartered in Bunbury Western Australia, operating one branch office in Balcatta Western Australia with an average of 128 full time equivalent employees.

Perkins is structured as a private proprietary limited entity with Perkins Investments (WA) Pty Ltd as trustee for the Perkins Investment Trust, a discretionary trust as our sole shareholder. The beneficial owners of the Perkins Investment Trust are members of the Perkins family with Mr. Daniel Perkins as the Sole Director and Sole Shareholder. Perkins (WA) Pty Ltd has no subsidiaries however, the Perkins Investment Trust does have other interests as outlined below.

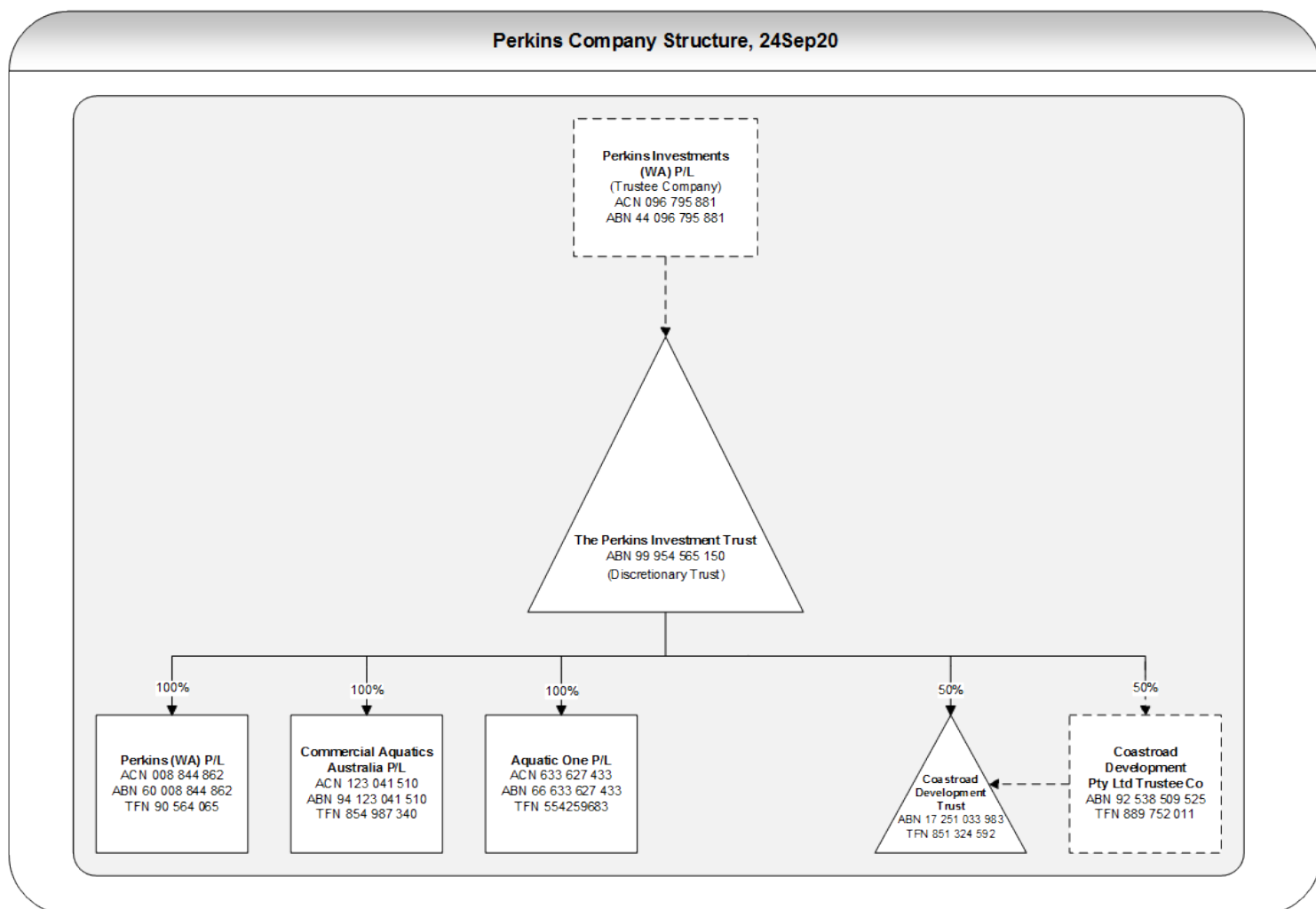


Diagram 1: Entity Structure chart.

Perkins concentrates on the acquisition and delivery of commercial and industrial construction projects for Government, Industry and Private Developers. In our delivery of projects Perkins engages direct employees completing manual construction activities, project management, business development and administration tasks, with the majority of construction activities being completed by entities either subcontracted or under supply only agreements. Our arrangements may include supply of labour, materials and plant, labour and plant, labour only and hire of equipment only.

We prequalify all subcontracted organisations to establish a level of confidence in their practices relating to safety, quality, and legislative requirements including their adherence to the Modern Slavery Act 2018.



SUPPLY CHAIN

Construction materials are sourced in accordance with the specification for each individual project, the selection of materials and equipment are generally made by consultants whom are either employed directly by our Client or in the case of a design and construct project, engaged by Perkins.

Labour engaged on projects is predominantly provided by subcontractors whom are Australian registered entities domiciled in Western Australia and occasionally from other parts of Australia. Perkins have not used labour from any overseas organisations and consider future engagement unlikely. Material supplies are sourced from Australian entities including manufacturers, resellers or importers, Perkins have limited ability to influence the manufacturing processes of products imported to Australia.

With a majority of local employed and subcontracted workers used, Perkins have assessed that there is no risk within our human resource-employee practices and processes and a very minor risk in the employment sector of our subcontractors and suppliers. Perkins have identified the level of risk escalates where the sourcing of materials is obtained/conducted from other parts of the world. With cost competitiveness being the major driver in securing construction works many materials are sourced in the developing world and in turn exposing supply chains to modern slavery risks.

In an attempt to ensure all of Perkins subcontractors and suppliers are aware of our collective obligations to the Modern Slavery Act 2018 we have identified and communicated the requirements via our Contract documents. Such documents require the subcontractor / supplier to cooperate in reducing the risks of and subsequently contributing to the reduction of modern slavery.

Additionally, as a recent initiative, Perkins have established a Modern Slavery Self-Assessment and all active Subcontractors and Suppliers (most of whom are small to medium enterprises with the majority not required to report) will be required to complete and return to Perkins for review and analysis to ensure that the requirements of the Modern Slavery Act have been considered.



RISK IDENTIFICATION AND MITIGATION

Perkins Builders are committed to identifying and mitigating risks of modern slavery practice in employment practices

1. Recruitment processes

Perkins Builders follows best practice Equal Employment Opportunity guidelines during the employee recruitment process. Candidates must provide evidence of their right to work in Australia and details of any restrictions on this right. Where a visa is required, all criteria is met before the nomination/application is lodged. The Perkins Builders Contract of Employment contains a clause requiring staff to declare any changes in their visa rights.

2. Conditions of employment

All employment across the Perkins Builders is governed by Modern Awards, Enterprise Agreements and/or the Fair Work Act 2009. We complete annual audits to ensure compliance to minimum employment conditions (i.e. National Employment Standards, Modern Awards, and Enterprise Agreement).

3. Training in workers' rights and workplace grievance mechanisms

Perkins provides comprehensive induction training to all new workers which covers a range of areas including:

a. Fair Work Information Statement

This information covers the entitlements and protections that all employees in Australia have access to including:

- i. Fair work laws
- ii. Awards, Enterprise Agreements & Employment Contracts
- iii. National Minimum Wages
- iv. National Employment Standards
- v. Protections at Work
- vi. Contact details for the Fair Work Ombudsman and Fair Work Commission.

b. Code of Conduct

Information about how we expect team members to behave towards each other, our customers and the broader community

c. Grievance Procedure

Detailed policy and mechanism for addressing workplace grievances and complaints

4. Staff training on Modern Slavery and Trafficking

As part of our Mandatory Training framework, all senior executive staff have undertaken training on modern slavery and the Act. This training is a requirement for all new starters at senior level within the organisation.

Note: The effectiveness of the identified measures is subjective as currently we have no direct knowledge of any modern slavery practices and would move to exclude any suppliers identified whom were engaged in such behaviour.



EXAMPLES OF RISK MITIGATION AND CONTROLS

CATEGORY	RISK	CONTROLS	LEVEL OF RISK
Human Resource	Underpayment of wages to employees.	Audit completed in April 2020 of randomly selected group of staff to ensure compliance to minimum employment conditions (i.e. National Employment Standards, Modern Awards, Enterprise Agreement).	High
Human Resource	Employing a worker with the incorrect visa or residency status.	New starters required to provide evidence on commencement of their working rights and restrictions. Where a visa is required, all criteria is met before the nomination/application is lodged. Contract of employment clause requiring staff to declare any changes in their visa rights.	High
Human Resource	Mismanagement of unpaid work experience placements.	Agreement formed between Perkins and the Education Organisation (i.e. School, Registered Training Organisation, University etc.) setting strict rules as to what work can and can't be performed under work experience arrangements. Appropriate insurances exchanged between Perkins and the Education Organisation. Appropriately skilled supervision assigned to work experience student to maximise experience, and mitigate and safety risks associated with the work experience being performed.	High
Business Development	Donations to Organisations.	Acknowledgement required of awareness and steps taken against Modern Slavery via Perkins Modern Slavery questionnaire. Generally local organisations supported, should we donate to overseas organisations we will assess their operations to minimise the chance of contributing to modern slavery.	Moderate
Project Management	Suppliers	Acknowledgement required of awareness and steps taken against Modern Slavery via Perkins Modern Slavery questionnaire.	Moderate
Project Management	Subcontractors	Acknowledgement required of awareness and steps taken against Modern Slavery via Perkins Modern Slavery questionnaire.	Moderate
Project Management	Consultants	Acknowledgement required of awareness and steps taken against Modern Slavery via Perkins Modern Slavery questionnaire.	Moderate



MODERN SLAVERY POLICY STATEMENT

COMMITMENT

Perkins Builders believes that all persons are entitled to free choice and as such is committed to ensuring that all of our business operations are conducted in a way as to eliminate the exploitative practices of modern day slavery.

We are opposed to all forms of human trafficking, slavery, servitude, debt bondage, forced labour, child labour and deceptive recruiting for labour or services, and shall take all necessary steps to ensure the development of moral and ethical practices in all of our business dealings and relationships.

Our objective is to establish process and controls to ensure compliance with the Modern Slavery Act 2018 and eliminate the opportunity for exploitative practices.

MANAGEMENT RESPONSIBILITIES

Management are responsible for the development, implementation and ongoing review of processes to eliminate exploitative practices in all of our business operations.

Training shall be provided to our employees to ensure a high level of understanding of the risks associated with the exploitative practices of modern day slavery.

EMPLOYEE RESPONSIBILITIES

All employees shall undertake all practicable steps, to ensure that our standards are being implemented throughout our operations.

Where there is reason to believe or suspect that a conflict with, or breach of, this policy has occurred, or may occur in the future the employee shall notify their relevant Manager as soon as possible.

CONSULTATION

All Perkins Builders employees have a responsibility to participate in the detection, prevention and reporting of instances where this policy may be in breach.

A handwritten signature in blue ink, appearing to read "e.l.", is positioned above a horizontal line.

Managing Director
4th June, 2019



WHISTLEBLOWER POLICY

INTRODUCTION

Perkins is committed to ensuring that all of our business is conducted in an honest and ethical manner. Perkins has a desire to establish and nurture a culture where employees and other workers can raise concerns regarding any serious wrongdoing (including unethical, illegal, corrupt or other inappropriate conduct) without being subject to victimisation, harassment or discriminatory treatment.

This policy aims to:

- Encourage employees and workers to report an issue in good faith if they genuinely believe an employee or worker has engaged in serious wrongdoing;
- Set out avenues available to employees and workers to report serious wrongdoing to Perkins; and
- Outline how Perkins will deal with all reports of serious wrongdoing.

WHO THE POLICY APPLIES TO

This Policy applies to employees, Directors, officers, contractors, suppliers and consultants of Perkins.

RESPONSIBILITY TO REPORT

Perkins relies on its employees and workers to help maintain and grow its culture of honesty and the highest ethical behaviour. If an employee witnesses serious wrongdoing, they should report the matter to a Protected Disclosure Officer.

Reportable matters include any conduct that involves:

- Fraudulent activity;
- Illegal activities (including theft, dealing in or use of illicit drugs, violence or threatened violence and criminal damage against property);
- Unethical behaviour that would breach the Perkins Code of Conduct;
- Any behaviour that poses a serious risk to health and safety of any person in the workplace;
- Bullying or behaviour in which intends to intimidate another person;
- Behaviour not consistent with Perkins values and culture;
- Dishonest behaviour;
- Participation in activities that jeopardises Perkins corporate image and reputation;
- Unlawful, corrupt or irregular use of company funds or services;
- Behaviour which is oppressive, discriminatory or grossly negligent;
- A serious risk to public health, public safety or the environment; or
- Any conduct which may cause loss or detriment to the interests of Perkins.

Issues relating to Human Resources and Industrial Relations are to be managed via the Human Resources Management Plan and Industrial Relations Management Plan; Safety Incidents should be reported via the Incident Report Form in accordance with the Incident Reporting Analysis and Corrective Action Procedure and should be excluded from this Policy.

MANAGEMENT RESPONSIBILITIES

Protected Disclosure Officers are assigned within the business to manage any report of serious wrongdoings and ensure prompt action is taken to investigate reports made under this Policy. An investigation will be conducted in a fair and independent manner and all reasonable efforts will be made to maintain the confidentiality of an investigation.

A Whistleblower who makes a report in good faith in accordance with this Policy will not be discriminated against, victimised, harassed, dismissed, demoted, disadvantaged or prejudiced in their employment or engagement with Perkins even if the report is subsequently determined to be incorrect or unsubstantiated. However this Policy will not protect a Whistleblower if they are involved or connected to the improper conduct or illegal activity.

Managing Director
7th January, 2019

APPROVAL

This statement has been approved by Perkins Investments (WA) Pty Ltd as trustee of the Perkins Investments Trust on it's own behalf and on behalf of the Trust and the Reporting Entity, Perkins (WA) Pty Ltd pursuant to sections 14 (2)(d)(ii) and 16 (2)(b) of the Act.



Daniel Neville Perkins
Sole Director and Sole Secretary
Perkins Investments (WA) Pty Ltd
25 May 2021





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