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FY21
-22

MODERN SLAVERY STATEMENT

D&E Air Conditioning
Pty Ltd

Introduction

We are dedicated to enhancing our systems and procedures to prevent being complicit in modern slavery and/or human rights violations connected to our own operations, our supply chain, and our services.

This Modern Slavery Statement has been produced by D&E Air Conditioning Pty Ltd. This statement supports the reporting requirements of the Modern Slavery Act (Cth) 2018 and outlines how D&E Air Conditioning Pty Ltd have acted to reduce modern slavery risks in its operations and supply chains from 1 July 2021 to 30 June 2022.

We acknowledge modern slavery can take on various forms, including forced labour, child labour, domestic servitude, sex trafficking, workplace abuse, and human trafficking. In this statement, the terms “modern slavery” comprises the listed forms of coerced, unlawful, and immoral labour.

Our Commitment

WE ARE COMMITTED TO IMPLEMENTING AND ENFORCING EFFECTIVE SYSTEMS AND CONTROLS TO ENSURE THAT MODERN SLAVERY AND HUMAN TRAFFICKING DOES NOT OCCUR IN OUR BUSINESS OR SUPPLY CHAINS.

At D&E Air Conditioning, we take our responsibility to prevent modern slavery and human trafficking seriously. We are committed to ensuring there is no modern slavery or human trafficking in our corporate activities, in our supply chains, or in any part of our business.

It is embedded in our core values that we respect human rights in all our business operations. We understand how our purchasing decisions can influence communities and individuals. Therefore, we make sure to collaborate with suppliers who have an ethical approach.

We have zero tolerance for any form of slavery, human trafficking, forced labour, or child exploitation. We expect our suppliers, contractors, employees, and all other business partners to share this commitment and to comply with applicable anti-slavery laws.



Our Operations & Supply Chains

The reporting entity is D&E Air Conditioning Pty Ltd (ABN 24 158 631 979).

D&E Air Conditioning Pty Ltd is a privately owned and operated Australian company operating since 1989. We have extensive experience includes all aspects of complete HVAC system design, engineering, installation, commissioning, and optimised maintenance across a wide range of industries.

The business' head office is located at 11 Corporate Ave, Rowville 3178 with additional branches and operations located in New South Wales, Victoria, South Australia, Western Australia and Queensland.

We directly employ over 500 staff in various roles including Project Managers, Site Managers, Contract Administrators, Estimators, Plumbers and Service Technicians with all employees engaged under Workplace Agreements, relevant awards, and/or individual agreements.

Our professional and talented employees are highly motivated and committed to delivering projects to the highest standard possible. We have built, developed, and maintained many long-standing relationships with numerous Clients nation-wide through the implementation of our 'best practice' systems.

Our operations include:



Project Management



Mechanical Engineering



Technical Expertise



Design & Estimating



Prefabrication



Manufacturing



Commissioning



Service

D&E Air Conditioning Pty Ltd supply chain involves Australian based suppliers to source materials, equipment, and services for our national construction projects. Procurement for goods and services, range from IT equipment to safety and branded apparel, site and office consumables and HVAC equipment and materials for installation and service.

Over the reporting period, we sourced these products and services from more than 1,000 direct suppliers, all based in Australia.

Most of their products and materials are acquired locally, although some suppliers source parts from countries such as France, Germany, Singapore, the USA, Malaysia, China, and the UK.



Risks of Modern Slavery in our Operations and Supply Chains

During this reporting period, we reviewed our supply chains and operations and commenced developing a risk register based on a supplier questionnaire response relating to modern slavery risks.

Subcontractors and labour hire companies are all based in Australia and subject to Australian workplace and employment laws and are considered low risk.

We understand the various risks posed by the construction industry regarding equipment, parts and materials our suppliers may source from overseas. We will continue to regularly assess the risks associated with the following construction-related components in our supply chain:

- Manufacturing products and sourcing material and their country of origin.
- Migrant workers, casual/transient employees, and low-skilled workers providing labour hire and temporary labour services.

All suppliers must comply with D&E Air Conditioning's "Supplier Code of Conduct" which outlines the expected legal and ethical standards of business conduct. We expect all our suppliers to abide by the laws of the countries they operate in and to demonstrate a commitment to human rights.

At D&E Air Conditioning, we understand the importance of adhering to the laws, acts, and awards applicable to each state. We take pride in our recruitment practices, as they promote diversity and inclusion among all demographics, bringing value to our company and contributing to the community. As such, our risk of modern slavery practices is low.

Actions to Address Risk, Our Due Diligence and Remediation Processes

Action	FY 21-22
Modern Slavery Supplier Questionnaire	We have implemented supplier questionnaire allowing us to review and analyse reporting data we will continue to review the questions and issue annually to all our suppliers.
Supplier Agreements	We are working towards formulating a Supplier Agreement Template that will provide uniformity and comprise terms pertaining to the potential risks of modern slavery as well as the company's expectations of ethical trade.
Supplier Code of Conduct	D&E is striving to revise and reissue their supplier code of conduct, as well as to provide information about the potential risks of modern slavery in supply chain to all current suppliers.
Awareness Training	The business currently provides Modern Slavery in supply chain training to those it is most applicable. D&E intend to include Modern Slavery Awareness training as part of the new employee induction. Online Modern Slavery Training is provided to all key personnel who engage our suppliers, including Procurement Teams, Estimators, Project Managers in the current reporting period.
Whistle-blower Policy	A Whistle-blower Policy is to be developed and communicated to all staff during reporting period Financial Year 22-23.
Remediation Process	The Dispute and Resolution Policy is due for a review in 2023, should amendments be made the Dispute and Grievance Resolution Policy will be re-issued to all employees.

Assessing the effectiveness of our Actions.

D&E will continue to assess the effectiveness of our actions taken to address Modern Slavery through a committee to supervise our key actions to ensure they are working properly and can be improved upon.

The committee will monitor and assess the success of our Modern Slavery Policies, Procedures, and activities, and make changes whenever necessary to reduce risk in both our operations and supply chain. They will also make sure our risk identification and assessment approaches remain up to date and effective.

We understand the necessity of continuously improving our efforts and activities to make meaningful contributions to the battle against Modern Slavery. As such, we have identified key areas of concentration for our future reporting periods as well as the "planned actions" identified in our risk mitigation and due diligence table. This approach is an ongoing process which we review and update on an annual basis.



Consultation

The Modern Slavery Committee at D&E Air Conditioning was created to understand and reduce the risks of Modern Slavery in our workplace and supply chain. The committee includes Directors, Project Managers, Human Resources, Procurement and Estimating personal. Through consultation and collaboration, the committee is responsible for reviewing and discussed existing company practices in relation to Modern Slavery Risks, as well as opportunities for improvement.

Approval

This statement is made pursuant to section 13 of the Modern Slavery Act 2018 (Cth) in relation to the operations and supply chains of the D&E Air Conditioning Pty Ltd for the period 1 July 2021 to 30 June 2022, and was approved by the Board of D&E Air Conditioning on Monday 1st May 2023.

A blue ink signature of Greg Andrews, written in a cursive style.

Greg Andrews
Director

A blue ink signature of Colin Way, written in a cursive style.

Colin Way
Director

A blue ink signature of Brad Alexander, written in a cursive style.

Brad Alexander
Director

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