

Modern Slavery Statement

2023



paynter
dixon

About our business



Paynter Dixon delivers property, master planning, design, construction, remedial and insurance services for building owners and occupiers.

Founded in 1914, the Company has a long heritage in partnering with clients to design, build and deliver high-quality and cost-effect projects which enhance their business.

The company specialises in a range of property, master planning, design, construction, remedial and insurance services for building owners and occupants. This breadth of expertise delivers projects across multiple sectors including hospitality, education, health, remedial, insurance, community and aged care.

Our diverse workforce maintains a substantial base of construction and property professionals, including architects, engineers, and project managers. The skills base is further supplemented by a range of professional services, incorporating accountants, marketing, information technology and human resources professionals – as well as administrative staff acting in a shared services capacity across the Company.

The Company has two employing entities:

- / Paynter Dixon Management Services Pty Limited
- / Paynter Dixon Pty Limited

Our offices are in:

- / Rhodes, NSW (head office)
- / Coffs Harbour, NSW
- / Canberra, ACT

The Company's supply chains include:

- / Manufacturing and distribution of the products we use in the construction process, such as bricks, gyprock, tiles, paint, sand, and cement
- / Services which contribute to our operations, such as the cleaning, security and labour hire companies that service our offices and building sites
- / The supply chains of our clients, consultants, and subcontractors.

Potential risks

Potential risks in our operations and supply chains

Following a review, the Company identified specific modern slavery risks within its business and supply chain, as follows:

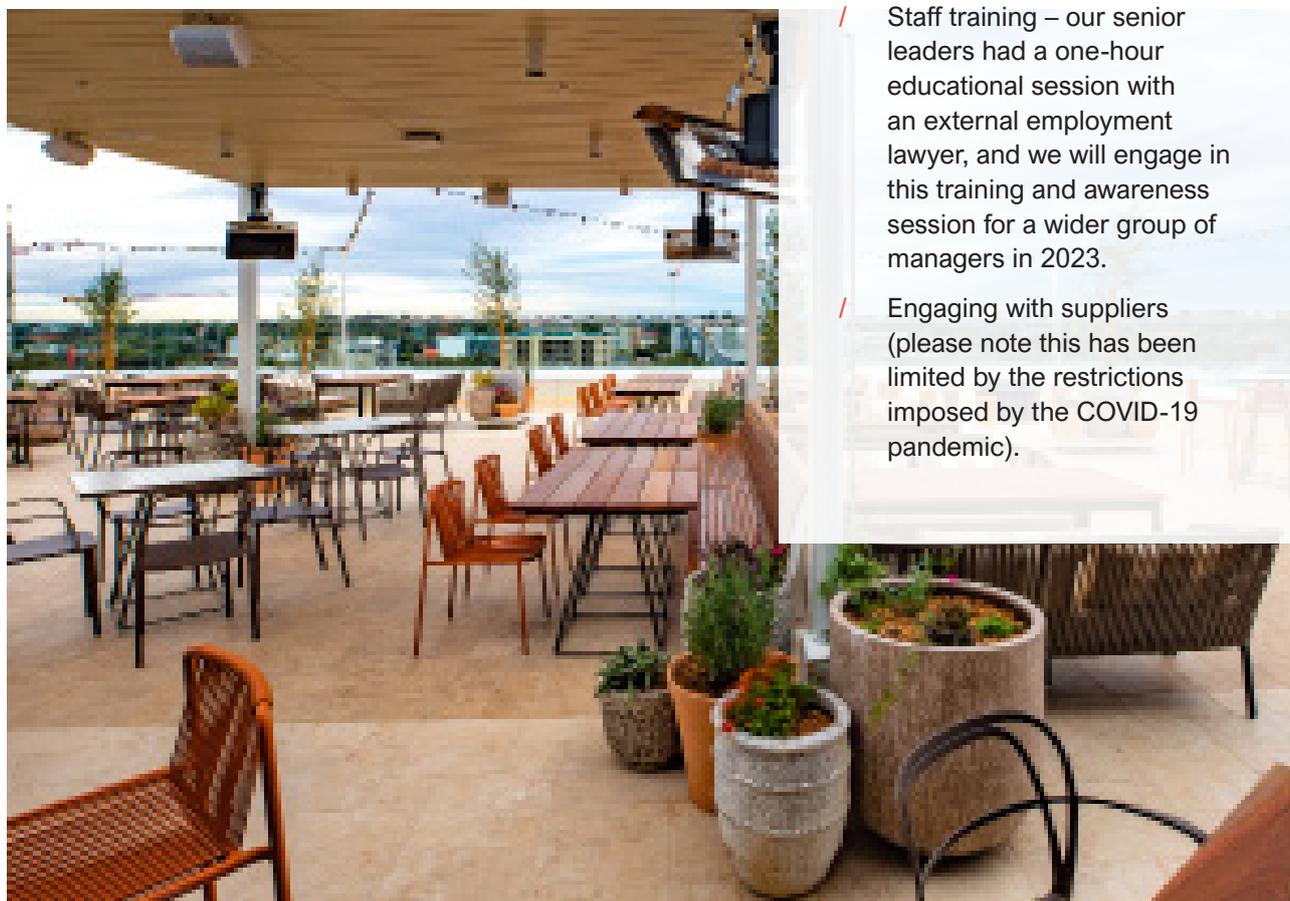
- / A risk that the Company may contribute unknowingly to modern slavery practices through its arrangements with third-party supplier factories and subsidiaries.
- / Labour practices used by raw material suppliers and Companies we use to engage temporary on-site labour on our construction sites i.e:
 - a. Seasonal /temporary/ short term labour.
 - b. Subcontractors engaging foreign workers to work on our building sites.
 - c. Labour hire agencies engaging foreign workers to work on our building sites.
- / Geographical risks – some countries may have higher risks of modern slavery occurring. However, as our Company operates solely in Australia at this time, the risk factor has been deemed low.

Addressing the risks

Assessing the risk of modern slavery practices

During the reporting period and continuing into 2023, the following steps are being taken to improve the Company's understanding of and capacity to identify and manage modern slavery risks:

- / Reviewing our subcontractor and consultancy agreements.
- / Reviewing existing information on supply chains (please note there have been significant limitations triggered by the COVID-19 pandemic during the last reporting period).
- / Assigning responsibility for assessing and addressing risks to a team or individual
- / Staff training – our senior leaders had a one-hour educational session with an external employment lawyer, and we will engage in this training and awareness session for a wider group of managers in 2023.
- / Engaging with suppliers (please note this has been limited by the restrictions imposed by the COVID-19 pandemic).



Hospitality – Lady Banks Rooftop Bar

Assessing our actions

Assessing the effectiveness of our actions

It should be noted that since the last modern slavery report submitted by Paynter Dixon, the ability to assess the effectiveness of our actions has been limited by the COVID-19 pandemic. We plan to act on our previously communicated actions and plans in 2023.

The Company will (and has assessed to varying degrees) the effectiveness of its action to both assess and address modern slavery risks by:

- / An annual review.
- / Regular engagement with suppliers.
- / Assessing new suppliers.
- / Identifying learnings.
- / Measuring progress.
- / Developing an action plan.
- / Developing policies and procedures.

Consultation

Consultation

The Company and the entities it oversees adopt a collaborative approach to combating modern slavery.

This collaboration occurs by:

Ensuring ongoing and meaningful dialogue occurs between entities on a regular basis. Our People & Culture team operates at a group level across all entities and thus has regular contact and oversight with the operations and procurement teams in each operating entity. The People & Culture team meet regularly with the procurement teams and regularly brief the Group's board on any relevant items of concern.

The Group's corporate culture is one that is founded on trust, transparent communication and respect. Therefore open dialogue around combating modern slavery is prevalent and actively encouraged.

This process will be regularly monitored and reviewed to ensure it remains effective throughout the course of the reporting period.





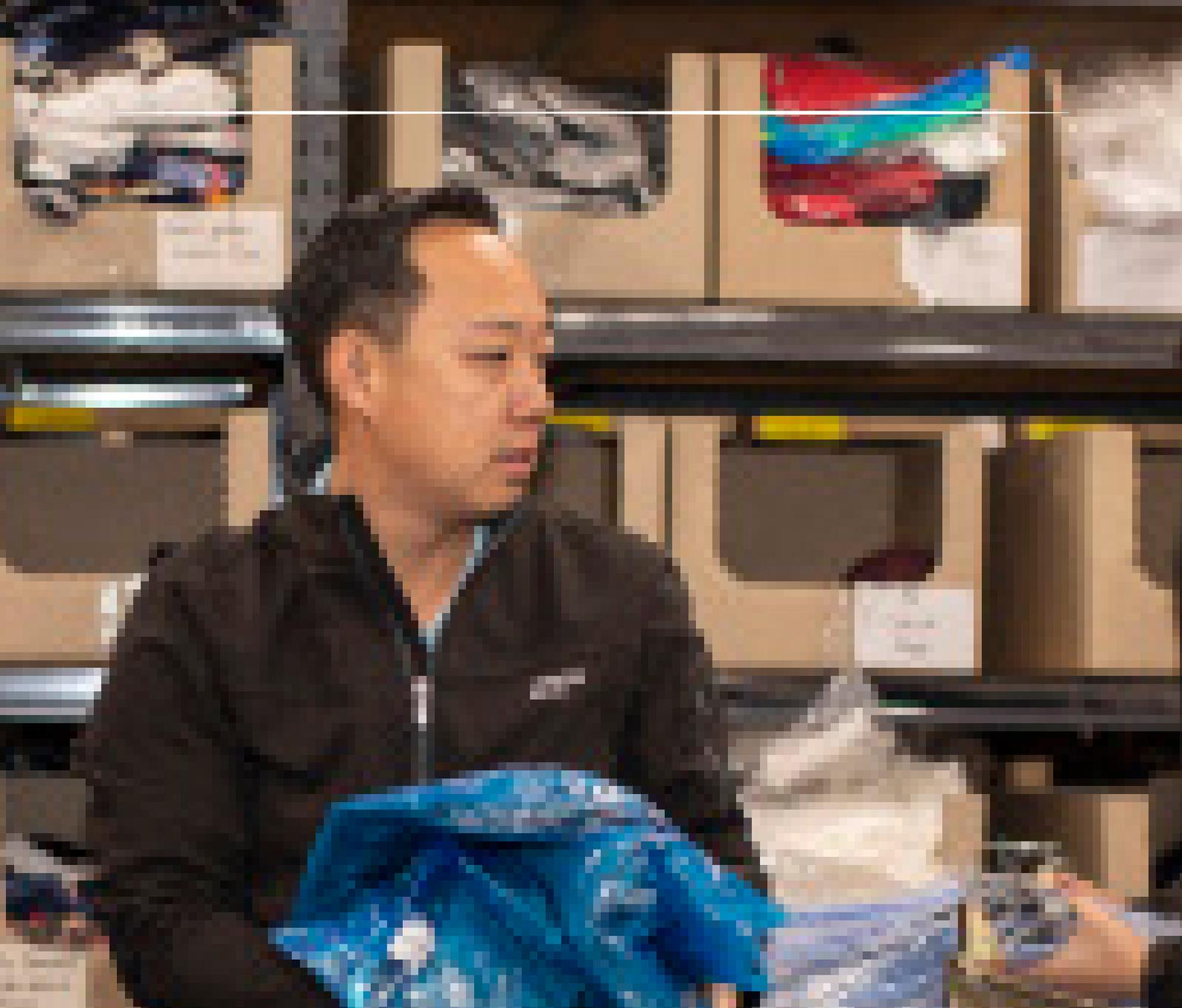
Future

commitments

The Company is focused on continuously improving our awareness and response to the risk of modern slavery in our business and supply chains.

To further strengthen governance and controls around modern slavery risks, the Company is committed to:

- / Reviewing and updating supplier contracts.
- / Reporting on progress.
- / Training staff.
- / Staying up to date with guidance issued in connection with modern slavery.



Approval

This statement was approved by the Board of Directors of each of the two reporting entities covered by this statement under Paynter Dixon Holdings.

The Board of Directors of Paynter Dixon Management Services Pty Limited; and Paynter Dixon Pty Limited approved this statement on 12 December 2022.

James Boyd
Executive Chairman
Paynter Dixon Management Services Pty Limited
12 December 2022

James Boyd
Executive Chairman
Paynter Dixon Pty Limited
12 December 2022

Sydney (Head Office)

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