



Anti-Modern Slavery Statement

Financial Year 2019-2020



St Hilliers

1. Our Policy

St Hilliers' **Anti-Modern Slavery Policy** is to use our best endeavours, as a socially responsible corporate group, to ensure that we maintain ethical sourcing and are not inadvertently involved through our business in facilitating modern slavery offences in breach of applicable Australian anti-modern slavery legislation. '**Modern slavery**' includes any conduct constituting a modern slavery offence under the relevant legislation and any conduct involving the use of any form of slavery, servitude or forced labour to exploit children or adults.

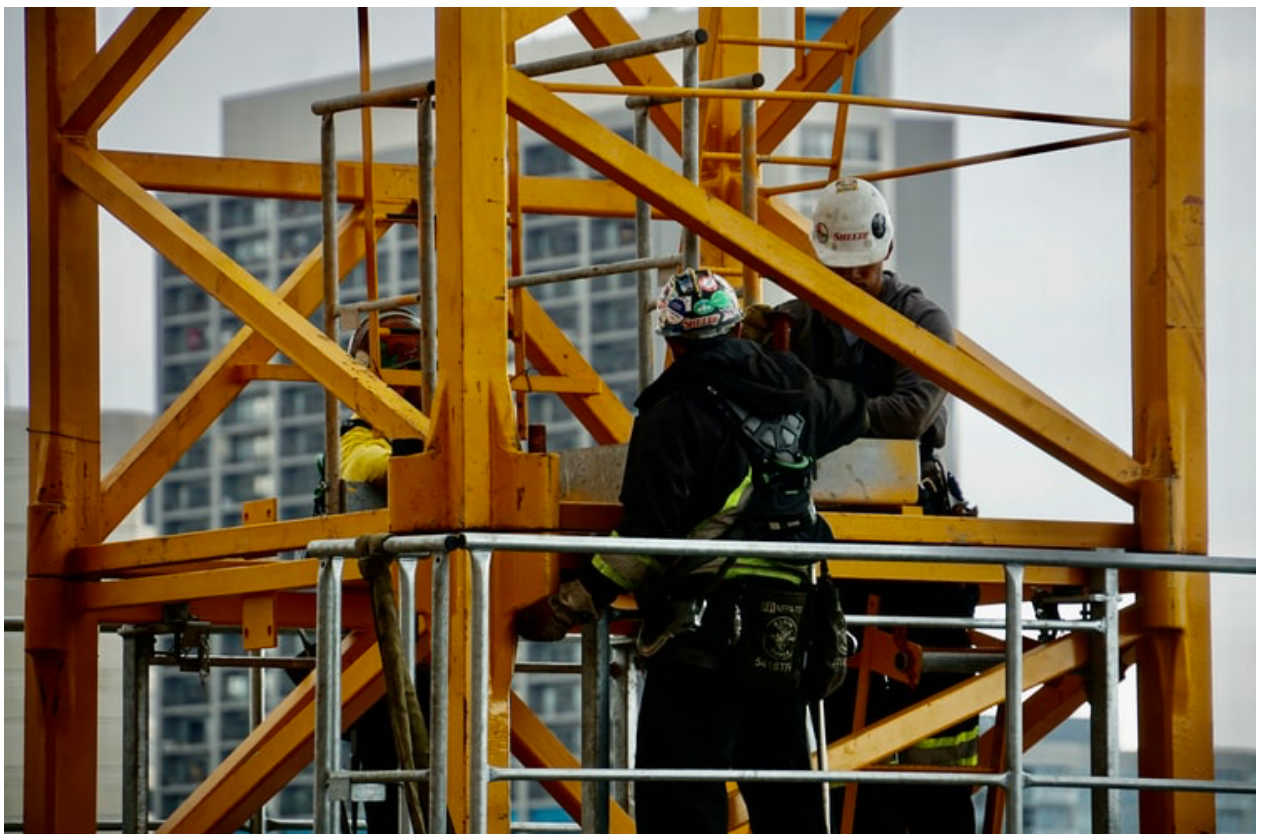
In accordance with our **Anti-Modern Slavery Program** we are committed to ensuring that a high standard of ethical practices is adhered to in our supply chain, and that our contractors and suppliers are not involved in forced labour, debt bondage or any other facet of modern slavery.

We seek to identify, mitigate and manage any risk to those group members to which Australian anti-modern slavery legislation applies that their normal business might involve or facilitate modern slavery practices.

Our Anti- Modern Slavery Program is part of the general Compliance Program of the Group, which includes guidelines, procedures, structures and systems designed to ensure compliance with legal obligations. We are committed to a compliance culture within the St Hilliers Group and to continuous improvement in compliance performance.

The primary purpose of the Program is to **identify, mitigate and manage** (in compliance with such requirements (if any) as are specified in the relevant legislation) any risk that we may reasonably face that the provision of services might (whether inadvertently or otherwise) involve or facilitate modern slavery or that through our supply chains we might be directly linked to modern slavery. We are committed to supporting Australia's international reputation as an active participant in the international movement against modern slavery.

Cover photo by Shivendu Shukla, photo below by Jack Sloop, on Unsplash



2. St Hilliers' Code of Ethical Practice

[Based on the principles of the Ethical Trade Initiative Base Code and reflecting the international standards set out in the International Labour Organisation (ILO) Convention]

- Suppliers and subcontractors must not use forced, bonded or involuntary labour and workers must not be obliged to surrender identity papers or pay a financial deposit as a condition of work.
- Workers must not be subject to physical or verbal abuse, threats or intimidation.
- Workers must not be required to work excessive hours and all workers should enjoy sufficient rest periods.
- Suppliers and subcontractors must not employ child labour and use workers under the age of 15, or the minimum legal working age in the country in question, if higher than 15. If child labour is identified Suppliers must establish appropriate remediation measures and implement effective systems to prevent the use of child labour in the future.
- Suppliers and subcontractors must provide safe and hygienic working conditions for all workers with sufficient and accessible fire exits from all production, warehouse and dormitory buildings. Workers must also be provided with clean and hygienic washroom and canteen facilities and have regular access to clean drinking water.
- Workers must not be required to operate dangerous machinery and suitable Personal Protective Equipment should be provided at all times.
- The structure and layout of all buildings should be compliant with local regulations and designed to avoid any risk to workers.
- All hazardous chemicals should be stored in appropriate conditions with suitable labels and secondary containers to prevent spillage. If serious or fatal accidents have occurred, then Suppliers will be required to demonstrate that all appropriate steps have been taken to avoid the risk of similar accidents occurring in future.



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- Dormitories and living accommodation, if provided, must include sufficient fire alarm systems and fire exits and must not be adjoined in any way to production and storage areas.
- Suppliers and subcontractors must pay living wages that are at least compliant with local minimum wage regulations and sufficient to meet basic needs.
- Suppliers and subcontractors must maintain accurate employment records for all employees, including current and resigned temporary and permanent workers, and be transparent and cooperative during the inspection of wages and working hours' records.
- Bribery, corruption and similar unethical business practices are not tolerated by the Group and suppliers and subcontractors must not engage in such activities.



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3. About the St Hilliers Group

St Hilliers is one of Australia's leading, private, integrated property and construction groups, based in Sydney and Brisbane. It carries out construction projects all over the Australian mainland.



“St Hilliers have been operating for more than 30 years and we have built this business by ensuring our clients’ expectations and our delivery are consistent.”

Our Operations principally involve:

1. Property development (including design, programming, marketing and sales) in the commercial, industrial, retail and residential sectors; and
2. Building and construction (including design) in each of those sectors, across mainland Australia.

Currently the Group engages some 140 staff.

At St Hilliers we are committed to supporting the many diverse communities in which we live and work across the country. Our partners include: Legacy / The Kids' Cancer Project / Meals on Wheels / Property Industry Foundation / Mates4Mates / SwichOn Inc / Randwick Rugby Club / Kids West Charity/ Cancer Council.

4. About the Reporting Entities

Our Structure: The Group is broadly divided into Property and Contracting arms. The entities which have reporting obligations under the *Modern Slavery Act 2018* (Cwlth) and are making this statement jointly are in the Contracting part of the Group, being as follows:

- STH Holdings Pty Ltd ABN 71 069 565 331, which is the holding company for the Contracting part of the group and does not trade
- its subsidiary St Hilliers Pty Ltd ABN 78 003 819 681, which does not trade and is the parent of the trading company St Hilliers Contracting Pty Ltd ABN 66 082 729 039.

St Hilliers is a closely held Group and the same directors and managers are involved and work directly with all the reporting entities and their subsidiaries in relation to these issues.

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5. Benefits of Combatting Modern Slavery

There are many benefits in combatting Modern Slavery, including:

- helping to protect vulnerable workers
- helping to prevent and remedy severe human rights violations;
- protecting and enhancing the Group's reputation and brand;
- protecting and growing the Group's client base as more clients seek out businesses with higher ethical standards;
- improved investor confidence;
- greater staff retention and loyalty based on values and respect; and
- developing more responsive, stable and innovative supply chains.

6. Our Supply Chains

Currently, due to the Covid 19 pandemic, supply chains are mostly intra Australia.

Our construction operations utilise Australian-based professional services (architects, surveyors) and subcontractors (concreters, tilers, carpenters, bricklayers) local to the Australian project site, where possible. These operations also use products and raw materials from our suppliers, which are currently Australian-based. Historically we did source materials or products internationally.

Our offices use products which may be sourced from overseas such as computers and other office equipment.

The MS risk in operations and supply chains of St Hilliers Contracting and any subsidiaries is currently considered to be low.

**Building the
future with you**

7. What We Have Done

We have:

- (1) adopted an Anti-Modern Slavery Program;
- (2) arranged to have the Program externally reviewed at least once a year and more often if there are relevant legislative changes;
- (3) Included in all our Group construction work contracts (such as Professional services agreements and subcontracts) provisions requiring the other party to comply with relevant Australian anti-modern slavery legislation as well as with St Hilliers Code of Ethical Practice and not be involved in modern slavery;
- (4) appointed an AMS Officer;
- (5) undertaken a high-level review of our likely modern slavery risks in our supply chains.

8. What We Are Working On

- making our contractors and suppliers aware that they must not themselves, either directly or through their supply chains, be involved in any facet of modern slavery, that such involvement may result in termination of their contract, and that we may at any time require further information to satisfy us that they have no such involvement.
- making our staff, our contractors and suppliers aware of our Anti-Modern Slavery Policy and that breach of that Policy, our Anti-Modern Slavery Program or the related procedures will be taken seriously and may result in disciplinary action or dismissal.
- complying with the law and aiming for best practice.
- maintaining a high standard of record keeping to assist in reporting to the regulator and in the investigation of possible modern slavery practices in our supply chain.
- continuing to develop our anti modern slavery program and appropriate business unit procedures in order to reflect our current legal obligations from time to time.

The above can be summarised as developing:

- (a) **due diligence** obligations to identify the parts of the Group's business and supply chains where there is a MS risk and identify if any modern slavery offence is occurring;
- (b) employee **training and monitoring**;
- (c) establishing **remediation processes**; and
- (d) **record-keeping** obligations to demonstrate the steps taken in relation to the above matters.



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9. Risk-Based Approach

We adopt a risk-based approach in combatting modern slavery, having regard to the nature, size and complexity of the St Hilliers Group business and the modern slavery risk relevant to the provision of the particular service. We are working to assess existing risks and the risks of contracting with new contractors or suppliers, and monitor transactions with them, using a risk-based approach which includes:

- (a) training employees and agents to be alert to Modern Slavery risks;
- (b) tailoring due diligence processes for contractors or suppliers according to our analysis of the Modern Slavery risk associated with those corporations (or corporate groupings) depending on type of provider, and the services, geographies or supply channels involved;
- (c) taking internal or external advice as to Modern Slavery risks and adapting policies, procedures, and our Program as appropriate.

Board Approval

This statement was approved by the Board on 20 May 2021 for lodgement on the Register.

Signed:

Timothy Gavin Casey

Sole Director & Secretary