




## **Modern Slavery Statement FY20**

This is the Modern Slavery Statement for Colin Joss and Co Pty Ltd (ACN 003 538 583) prepared in accordance with the reporting requirements of the *Modern Slavery Act 2018* (Cth) and associated guidelines.



“ 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*



## STRUCTURE, OPERATIONS & 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, the Australian Capital Territory and Victoria.

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 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.

The Company operates 15 regional offices throughout New South Wales and the ACT. The head office, main depot and workshop are located in Albury.





## JOSS CONSTRUCTION



**1,432**  
CONSTRUCTION  
SUBCONTRACTORS  
& SUPPLIERS

The commercial construction and civil 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.



**19**  
PROJECTS  
COMPLETED  
DURING THE PERIOD

The division employs a permanent team of qualified and experienced personnel who plan, coordinate 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 FACILITY MANAGEMENT



**1,882**  
FACILITY MANAGEMENT  
SUBCONTRACTORS &  
SUPPLIERS

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.



**11,642**  
PROPERTIES SERVICED

Over the past 23 years, Joss has established a base of 1800 prequalified Subcontractors who, under the coordination, supervision and management of Joss, undertake maintenance and servicing works across more than 11,000 sites on behalf of our Clients.

Unlike the asset maintenance component of the Facility Management division, the cleaning works undertaken by the division is predominantly carried out by employees, with specialist Subcontractors only utilised to undertake complex periodic work.







## RISKS OF MODERN SLAVERY IN THE OPERATIONS & SUPPLY CHAINS

During the FY20, Joss undertook a high level risk assessment in order to gain an understanding of potential risks within our Operations and our Supply Chains:

### Operations

Joss has assessed the risk of Modern Slavery within it's Operations to be low.

This Assessment took into consideration a number of factors:

1. The Company employs a qualified and experienced team of human resources personnel that have created, implement, 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 entitlements and awards across our entire workforce.
2. 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.
3. 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 Audits for State or Territory prequalification schemes, third party surveillance audits of our Certified management systems by SAI Global Assurance Services, Client initiated audits, visits by the Australian Building and Construction Commission and the NSW Code Compliance Unit, ACT's Secure Local Jobs Certification, annual financial audits required by ASIC or periodic state government payroll tax audits.
4. 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.

**Although each of these factors has not previously directly assessed the presence of Modern Slavery in our Operations, they all assess for common indicators of Modern Slavery practices.**

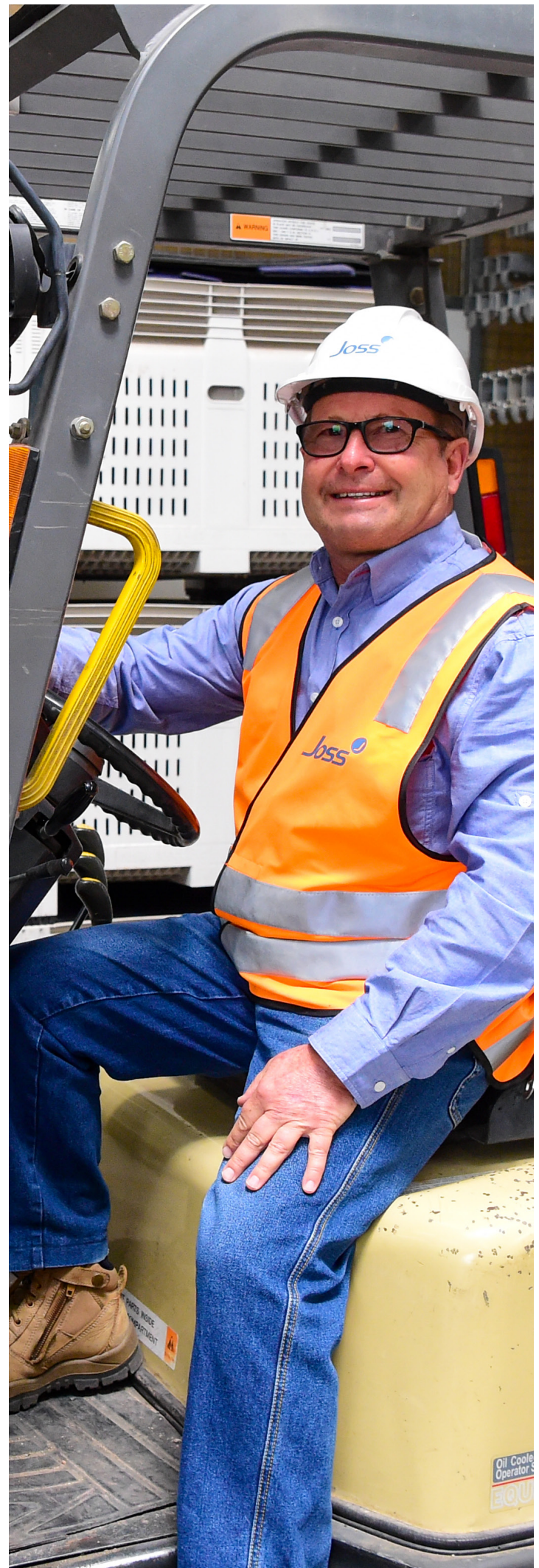
## Supply Chains

The initial risk assessment conducted during the reporting period identified that Joss may have exposure to Modern Slavery in our supply chains through the engagement of Subcontractors and Consultants as well as through the procurement of goods and materials (plant, equipment, vehicles, consumables and building materials):

### Subcontractors and Consultants

Joss is a regional contractor who utilise predominantly local regional Subcontractors. More than 99% of these are classified as Small and Medium Enterprises (SME's) who the Company has worked with for an estimated average of more than 10 years. Being regional ourselves, permanent staff in our regional offices have the benefit of becoming familiar with the firms and their employees. This background knowledge, either directly or by referral, supplements our existing assessment and induction processes.

Despite these factors, the 2018 Global Slavery Index found that the construction industry and the cleaning industry were considered 'at risk' of forced labour and that migrant workers were particularly vulnerable to 'rogue' practices including 'underpayment, non-payment of entitlements, such as leave or superannuation, and sub-standard accommodation.' Although a low possibility, Joss does recognise the potential within the Subcontractors we engage for forced labour and other practices that may lead to Modern Slavery.





## Goods and Materials

It was identified during our risk assessment that less than 5% of the Company's expenditure was attributed to direct procurement activities 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 represented 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. Despite the majority of these items being supplied or owned by subcontractors, they do represent part of the Company's supply chain.

The 2018 Global Slavery Index identifies specifically laptops, computers, mobile phones, timber, apparel and clothing products as internationally produced goods that are likely to be manufactured using slave labour. Bricks are also mentioned as a potential risk however no imported bricks were used by the Company during the reporting period. In addition to these significant and more easily quantifiable products, due to the diverse nature of materials and complex multi layered supply chains that extend overseas, it would be naïve to discount the existence of Modern Slavery in other building materials used by the Company.

Joss is aware that the three predominant manufacturers of it's directly procured IT equipment (Hewlett Packard, Apple and Samsung) have all acknowledged the potential of Modern Slavery in their supply chains and are making steps to eradicate it's prevalence.





## ACTIONS TAKEN TO ASSESS AND ADDRESS THESE RISKS

The high level risk assessment undertaken in FY20 identified the need to educate our staff, provide guidance on expectations and for the development of tools to assist in implementing the Company's approach to addressing Modern Slavery. From these three core elements, a staged strategy was developed that facilitated the resources to implement action and provided milestones to measure effectiveness.

Prior to the end of the reporting period, Joss had undertaken the key actions identified in the first stage of the strategy:



Key members of Management underwent training on Modern Slavery and undertook research into the steps that could be taken to further its elimination. A Modern Slavery Policy Statement was prepared and following further development and consultation the Policy was endorsed by the Managing Director.



Whilst researching Modern Slavery training options the Company identified the Supply Chain Sustainability School which offered a range of valuable resources including online training material that incorporated participant competency and provided traceability on successful completion. Joss has since become a member of the School and continues to utilise these resources.



Recognising the need to educate and further assess our Subcontractors and supply chains, subcontract clauses were prepared and incorporated into subcontracts and service agreements that encouraged awareness of Modern Slavery as well as mandating assistance to the company in further assessment of their supply chains.



## ACTIONS TAKEN TO ASSESS AND ADDRESS THESE RISKS

**These actions laid the foundation for the second phase of the strategy to be completed in the following financial year (FY21), including but not limited to:**

- ❑ The Establishment of a Modern Slavery Advisory Group comprising of a Modern Slavery Champion from each of the Company's operational divisions and supporting departments.
- ❑ Extend Modern Slavery Awareness training to encompass training for all personnel in procurement positions.
- ❑ Development and use of a Modern Slavery Internal Assessment tool to periodically record our internal assessment of employment and monitoring practices.
- ❑ Development and deployment of Subcontractor and Supplier Questionnaires to help Joss have a better understanding of the potential risks in its supply chain and the action, if any, our subcontractors are taking to minimise that risk. Due to the volume of Subcontractors, this assessment shall be split into two halves to facilitate the implementation and assessment tasks with the remaining fifty percent completed in phase three.
- ❑ Assessment of the data obtained from our Subcontractors and Suppliers to assist in our decision making regarding Subcontractor engagement and procurement.
- ❑ Interact 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.



## THE EFFECTIVENESS OF THESE ACTIONS

Undoubtedly, the introduction of the Commonwealth *Modern Slavery Act 2018* has helped to raise the level of awareness and commitment by the Australian business community to pursue more sustainable procurement practices. As a result of this initial legislation, and other legislation such as the *NSW Modern Slavery Act 2018 No 30*, it is hoped that the concerted worldwide pressure on supply chains will translate to a reduction and the eventual eradication of Modern Slavery. Data collated in future reports such as the Global Slavery Index will help communicate the effectiveness of global actions and guide efforts toward further initiatives.

Joss has established milestones and KPI's within it's own Modern Slavery strategy to assist in the monitoring and measurement of the actions and initiatives that it undertakes. For the FY20 these Milestones included:

- ✔ **Establishment of a Modern Slavery Policy Statement**
- ✔ **Inclusion of Modern Slavery Clauses in Subcontract Agreements**
- ✔ **Awareness Training of Key Senior Management Personnel**
- ✔ **Became a Member of the Supply Chain Sustainability School**
- ✔ **Undertaken a high level risk assessment and established a strategy of actions and initiatives**

Joss shall continue to implement actions, report against milestones and KPI's, and identify further initiatives and outcomes in future Modern Slavery Statements.

This statement was approved by the Joss Board on 30<sup>th</sup> March 2021.

**Paul Joss**  
Managing Director  
30<sup>th</sup> March 2021



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