ASSETLINK SERVICES PTY LTD MODERN SLAVERY STATEMENT

Reporting Period 2021/2022



ACKNOWLEDGEMENT OF COUNTRY

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We acknowledge the Traditional Custodians of the land and waterways on which we work and live. We recognise their continuing connection to land, water and community. We pay respect to Elders past, present and emerging.

Painting Credit - Meeting Place by Davinder Hart Davinder Hart is an Indigenous artist whose family roots connect from bibbulmun & Katanning in the South West region of the Noongar people.



About This Statement

This Modern Slavery Statement is made in accordance with the Australian Modern Slavery Act 2018. It applies to and describes the actions taken across the Assetlink Group during the financial year ending 30 June 2022 to identify and mitigate modern slavery within the business and across our supply chains.

This report was assembled in consultation with all entities via the Assetlink Modern Slavery Committee, chaired by Corporate Risk and reportable to the Assetlink Executive Leadership Team.

Reporting Entity

Assetlink Services Pty Ltd

ABN: 89 061 914 55

Registered Address: 6/2-12 Tennyson Road, Gladesville NSW 2111, Australia

Website: www.assetlink.com.au

Industry Sectors: (Including associated entities) Cleaning and Security Services | Construction, civil engineering and building products | Accommodation and hospitality | Information technology and telecommunications.

Mandatory Reporting Criteria

This Modern Slavery Statement covers the activities of The Assetlink Group and its subsidiaries as informed by Section 14 of the Commonwealth Modern Slavery Act 2018, for the period 1 July 2021 to 30 June 2022 (FY22).

This statement is structured to meet the mandatory reporting criteria:

- Section 1: Structure, Operations and Supply Chain
- Section 2: Risk Assessment
- Section 3: Risk Mitigation and Approach to Deal with Risk
- Section 4: Assessment of Effectiveness
- Section 5: Consultation
- Section 6: Training and Capacity Building
- Section 7: Looking forward

Author & Assetlink Contact

This Modern Slavery Statement has been authored in consultation with the Assetlink Modern Slavery Committee, by:

Christopher Dow | National Safety and Risk Manager Assetlink Group

Phone: +61 (0)478 017 613 | Email: christopherdow@assetlink.com.au



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CEO & MD Message

The foundations of Assetlink are built upon the values of care for people. Aligned to our internal values, vision and policies, this Statement is our opportunity to publicly denounce Modern Slavery in all its forms and share the actions we are taking to eliminate modern slavery practices in our organisation and through our supply chain.

It's with pleasure we present our third Modern Slavery Statement from the Assetlink Group. This report has been endorsed by the Assetlink Executive, inclusive of the endorsement by each of the Assetlink Group Executive Officers, as required by the Australian Modern Slavery Act.

To address the global issue of Modern Slavery, Assetlink remain committed to engaging and connecting with all those we work with to reduce modern slavery risk. Achieving this objective, in FY22 we delivered much improvement. Improvement highlights include,

- Re-energising our Modern Slavery Committee comprising Executive Leadership Team representation with governance through our corporate risk team.
- Updating our Modern Slavery Risk evaluation to identify and mitigate identified vulnerabilities.
- Undertaking supplier evaluations and risk assessments across the supply chain
- Strengthening our appreciation of Modern Slavery risk in our organisation through structured learning programs.
- Introducing performance metrics to monitor progress of implementation of Modern Slavery Risk controls.

In FY22, we also welcomed independent evaluation of our Modern Slavery efforts through external audit by our clients and independent third parties to validate and confirm the expectations of the Act are met. Evaluation feedback confirms our progress improves year on year.

On behalf of the Assetlink Group, I present this statement as a reflection of the efforts by our business respecting the human rights of all those we work with.

This Statement reports our actions from 1 July 2021 to 30 June 2022. In my role as Chief Executive Officer and Managing Director, I'm pleased to sign this statement which was approved by the Assetlink Services Board on 21 October 2022.

Aurora Fonte Chief Executive Officer and Managing Director The Assetlink Group 12 December 2022



SECTION 1 – Our Structure, Operations and Supply Chain



Section 1: Our Structure, Operations and Supply Chain

Headquartered in Gladesville NSW, Assetlink Services was founded in 1993 to provide cleaning and integrated facilities services to retail, aviation, and commercial sectors. **The Assetlink Group**, as the parent body, now comprises five different entities to provide services across facilities, construction, information technology, and cleaning and security services.

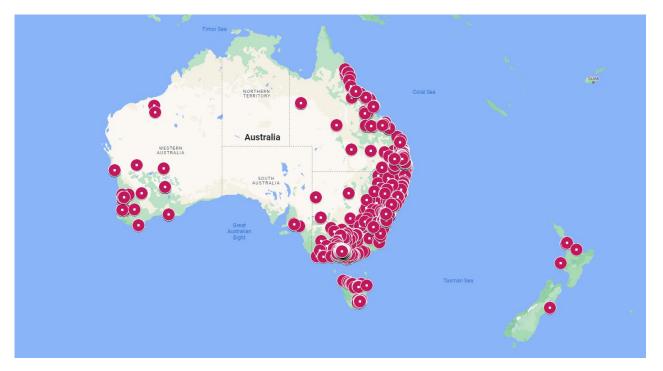
The Assetlink Group directly employs more than 2600 people with 96% employed within Assetlink Services. We have a diverse workforce who hail from around 80 different countries and speak 59 different languages. Within the Group, 40% of the workforce is female and approximately 5% identify as Aboriginal or Torres Strait Islander peoples.





Assetlink Services Geographic Presence (Australia)

Including Partner (Contractor) Presence-



Assetlink Services are present at over 1200 locations in Australia and New Zealand.



Our Structure, Operations and Brands

0	Assetlink Services delivers a fully integrated suite of property soft services. Australia and New Zealand regional management and operational support to delivery premium, innovative and efficient services with a technology platform foundation to drive consistency, reliability, and transparency of operations, safety, contract compliance and continuous improvement.
ASSETLINK	ABN 89 061 914 556
	Est. 1993 Employees in two countries 3,008
	Directly employed 80% Full-time employees 46%
	AssetFuture provides a comprehensive SaaS solution to support whole of life asset management as well as condition assessment and consulting support. The AssetFuture technological IP drives efficient, objective, comprehensive, and accurate predictive analytics to support both capex and opex portfolio spend.
	ABN 79 102 556 623
	Est. 2012 Employees in Australia 32
	Directly employed 100% Full-time employees 91%
Ø	AssetProjects provides construction, refurbishment, and project management support across a range of sectors including Aged Care, Retail, Strata, and government assets. AssetProjects leverages the safety and customer care culture of the Assetlink Group to deliver projects of the highest quality, safety, and reliability.
	ABN 47 159 230 592
ASSETPROJECTS	Est. 2015 Employees in Australia 11
	Directly employed 100% Full-time employees 100%
	Assetlink Indigenous Services is Assetlink's 51% Indigenous owned joint venture partner. A Supply Nation certified company, AIS is "Powered by Assetlink" and can deliver the full suite of services across Australia but adds a specific focus to support positive outcomes for the Australian Indigenous community.
ASSETLINK Indigenous Services	ABN 29 639 605 904
	Est. 2020 Employees in Australia 341
	Directly employed 41% Full-time employees 39%
	Assetlink Village Services delivers fully integrated remote mining village management services supporting catering, housekeeping, wet bar, retail, maintenance, airstrip management, and other services to support FIFO mining operations teams in WA and SA.
	ABN 43 159 230 574
ASSETLINK VILLAGE SERVICES	Est. 2020 Employees in Australia 85
	Directly employed 80% Full-time employees 89%



Our highly skilled and qualified team members deliver professional services to the exacting requirements of our clients and in compliance with our accreditation to:



Operations

The Assetlink Group provides services across a variety of industry sectors ranging from large scale national portfolios to single site facilities. We service, Government, Education, Health, Aged Care, Resource & Industrial, Retail and Commercial sectors.

Regardless of entity, Assetlink's businesses are service based with the major proportion of its work and derived income, residing within Assetlink Services. As a contracts-based organisation, we obtain and retain contracts to provide services through a tender/negotiation process; resulting in the necessity to continuously improve and identify opportunities to innovate; differentiating Assetlink from market competitors. When awarded new contracts, our people are deployed to client sites where they deliver the contracted services, represent the client's brand and partner closely with the client to ensure the success of their business, sustaining the success of our own entity.

Assetlink is an Australian – New Zealand business, servicing contracts at 1200+ locations in every state and territory of Australia and New Zealand. We have offices in Auckland, Brisbane, Sydney, Melbourne, Adelaide and Western Australia.

To ensure exemplary delivery of service, we will often draw on the expertise of specialist suppliers and contractors to deliver outstanding services for our customers upholding our reputation as an industry leader. When it comes to Modern Slavery, we expect our suppliers and contractors to comply with our performance standards and expectations on Modern Slavery.



Supply Chain

The Assetlink Group procures services and goods primarily through Australian and New Zealand suppliers.

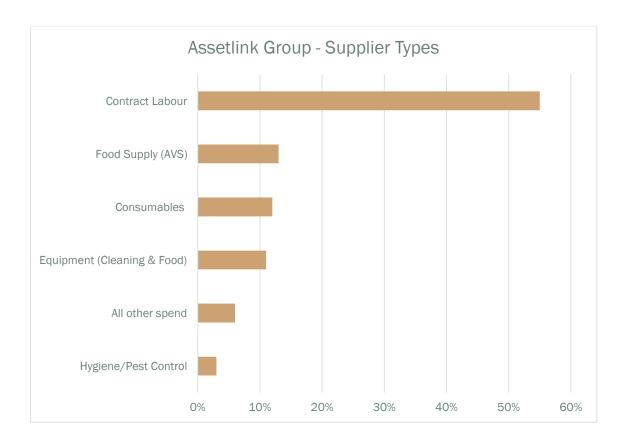
Procurement across the Group is undertaken through our Procurement and Supply Chain function, which supports a consistent, Group-wide approach to modern slavery risk management in relation to our suppliers.

Our Procurement team in collaboration with our Compliance function lead the strategic sourcing, supplier assessment, pre-qualification and onboarding processes. The contractual expectations for our suppliers are defined by Finance (Commercial) function.

Once approved, each business unit / function is responsible for oversight and governance, including management of risk.

Supply Chain at a Glace

While the Assetlink Group source their supplies through 1100 vendors (FY22), 94% of this spend is with just 100 businesses. A breakdown of Supplier types is detailed below.



SECTION 2 – Mitigating Modern Slavery Risk

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Section 2: Risk Assessment

Macro Risk Context: Services Industry in Australia and New Zealand

While the Global Slavery Index indicates that with our operations and supply chain undertaken predominantly in Australia and New Zealand, we are considered low risk, we also acknowledge the industry sectors of Cleaning and Security are recognised as high-risk industries.



Source: Global Slavery Index (Regional Findings - Asia and the Pacific) (2018)



Identification and Assessment of Risk

The complexity of our industry, the nature of a geographically dispersed workforce and the nature of the work carried out through partner Service-Providers (contract workforce) are the principal areas of risk within our business.

In FY22, Assetlink overhauled their enterprise risk assessment and extracted Modern Slavery as its own discrete element to ensure due focus on specific sources of exposure and define appropriate mitigation actions. This overhaul was also used to incorporate agreed assurance actions to validate how our controls are in place and effective.

The Assetlink Modern Slavery Committee meets regularly to evaluate risks and provide oversight for the deployment of agreed control actions.

Through evaluation of operations and supply chain, Assetlink has self-assessed the risk of modern slavery within our business as low. Sources used to inform our assessment include the: Global Slavery Index, the Responsible Investment Association Australasia and feedback from external (Modern Slavery) audit.

Operations and Supply Chain Risk

Our People:

As 96% of Assetlink's labour is directly employed, giving us direct control over the Employee Lifecycle – recruitment, onboarding, training, performance management and wellbeing programs for our sites.

With expectations to mitigate risks detailed in policies, and procedures, coupled with training and development in these expectations, ensures team members are free from modern slavery risks and are aware of what constitutes modern slavery.

Our team members are paid in alignment with the relevant Award, wages are paid by Electronic Funds Transfer into an individual's bank account.

Our Contract Workforce:

Where additional sub-contracted services are used (e.g., specialist cleaning services such as external high glass or hygiene services), Assetlink engages strategic partners through formal commercial agreements.

In FY22, our trading terms and conditions were updated to include additional expectations regarding Modern Slavery and include the impact of not meeting contractual expectations. Further, Assetlink launched a supplier evaluation questionnaire to identify risks by supplier. This newly introduced process step has also been incorporated into the onboarding process for any new suppliers (contractors or otherwise)

Our commercial agreements with our contract workforce include a commitment to regular compliance audits conducted by Assetlink's Service Provider Compliance Manager to ensure our partners continue to deliver their services in line with expectations.

Our Consumable Suppliers:

Our long-term suppliers of equipment and products, for cleaning services, are well renowned and we have worked closely with them for many years.

Irrespective of history and tenure, in FY22, Assetlink created and implemented a supplier evaluation to gain deeper levels of risk appreciation. This newly formed diagnostic will ultimately be deployed across all suppliers; data diagnosed, and risks identified. Of particular focus will be country of manufacture for consumables and equipment.

SECTION 3 – Mitigation and Approach to Managing Risk

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Section 3: Mitigation and Approach to Managing Risk

Identifying and Managing Modern Slavery Risks

The approach to identifying and managing Risk in Assetlink is based on the principles of,



The process for the identification and management of Modern Slavery Risk in Assetlink is aligned to the foundation's principles of ISO31000 and is further defined in the Assetlink Group Risk Management Standard.

In FY22, an overhaul of our approach to Modern Slavery Risk was undertaken and the agreement of the Modern Slavery Committee was to extract the specifics of Modern Slavery into a standalone Risk Assessment (as opposed to previous, where each risk type was integrated into functional risk assessments).

The upsides of the FY22 changes, creating a specific Risk Assessment for Modern Slavery includes:

- Focus on one discrete risk element, Modern Slavery
- Rapid identification of risks, controls, and assurance activities
- Greater ownership by the Modern Slavery Committee, monitoring implementation actions against specific risks.
- Ability to provide third parties (assurance bodies, clients, internal stakeholders) with a succinct summary.

Risk Management:

The process of risk management can be summarised as follows:



Implementation of Controls is expanded further and considerations, include:





Risk Themes:

The risk themes identified in the Modern Slavery Corporate Risk Assessment, include:

- Risk Identification & Governance
- Audit & Assurance
- Client Engagement
- Training & Education
- Supply Chain
- Contractual & Commercial Obligations
- Recruitment & Human Resources

Each theme is expanded to address potential sources of harm and controls documented in the Corporate Risk Assessment. The outputs of Modern Slavery Risk Assessment can be found in the Assetlink Services Corporate Risk Register – Section 4.0 Modern Slavery

Governance & Risk Oversight:

Aligned to the identified Risk dimensions (above); a functional body responsible for identification and remediation of Modern Slavery risk has been appointed by the Assetlink Group Executive. This body, known as the Modern Slavery Committee, is chaired by the National Safety and Risk Manager and reports directly to the Executive Leadership Team. The National Safety and Risk Manager provides updates on Modern Slavery Risk to the Assetlink Group Board.

Modern Slavery Committee Members:

- National Safety and Risk Manager (Chair)
- National Human Resources Manager
- Chief Financial Officer
- General Manager Business Development & Client Relations
- National Compliance Manager
- National Supply & Procurement Manager
- Director, Commercial

In FY22, a team charter was defined and implemented to clarify expectations of the Modern Slavery Committee members. This has aided the oversight and governance of Modern Slavery in the Assetlink Group.



Risk Management through Partner Suppliers:

While the Assetlink Group has robust processes and systems for the identification and management of risk, there is less oversight of our partner suppliers. To minimise risk, Assetlink sustain the risk-based approach when deciding whether to conduct detailed due diligence on our supply network. Risk factors include type of goods or services, country of origin and supplier.

Before engaging with a new supplier, the risk profile of that supplier is assessed against defined business criteria. Higher risk suppliers to complete additional risk assessment questionnaire and/or be audited.

In FY22, the Supplier Evaluation criteria was overhauled, re-defined and created as a digital survey to assess ALL suppliers for Slavery risk. This survey was piloted and tested in FY22 with a group of select suppliers, gaining their feedback in input. Additionally, the opportunity was taken to assess our suppliers from a more holistic Ethical-Sourcing perspective and additional criteria was included in the survey.

The supplier survey will then be deployed further in FY23 to all suppliers. For all new suppliers, the completion of the Modern Slavery (Ethical Sourcing) Assessment will be incorporated into the pre-qualification / on-boarding process.

Irrespective of Modern Slavery Risk, new suppliers must continue to meet pre-qualification requirements to be an approved supplier to the Assetlink Group. They must complete a contractor pre-qualification (CM3) and a Due Diligence Check and Risk Assessment.

The prequalification and onboarding process is overseen by Assetlink's National Supply Chain Manager, and National Compliance Manager. The current CM3 pre-qualification includes an Ethical Sourcing Questionnaire which covers key aspects of vendor operations (supply chain, labour hire, employment practices, industry type). Suppliers are assessed to identify the risks of the supplier possibly breaching Assetlink's ethical sourcing and anti-slavery policies.

Ongoing risk assessments and audits are conducted with our suppliers with any non-conformances reported and tracked to ensure closure and resolution. Regular awareness communication on various topics including modern slavery is undertaken with suppliers and employees.

Risk Calibration: Collaborating with other businesses, government and non-government organisations.

- To ensure a consistent appreciation of risk that is aligned to community standards and appreciation of risk, Assetlink draws upon the following globally recognised declarations, principles, and goals:
 - Universal Declaration on Human Rights
 - United Nations Guiding Principles on Business and Human Rights
 - United Nations Global Compact
 - International Labour Organisation Declaration on Fundamental Principles and Rights at Work
 - United Nations Women's Empowerment Principles
 - United Nations Sustainable Development Goals

Assetlink is a member of the Supply Chain Sustainability School of Australia (SCSS). The SCSS aims to create sustainable supply chains for property, construction and infrastructure industries in Australia and provides by providing collaborative, accessible education for a sustainable future.



Industry Associations

Assetlink align with Anti-Slavery Australia regarding foundation training for all employees in the understanding and eradication of Modern Slavery.

Additionally, Assetlink have been assessed by the Cleaning Accountability Framework (CAF) association, who are recognised as a leading anti-slavery in supply chains initiative by business and human rights and corporate social responsibility experts.

CAF address Modern Slavery risk in the Cleaning Supply chain by engaging with employing entities as well as setting and validating employment practices.

Implementation Actions:

1. Communicating Assetlink Standards to Suppliers

We work with our suppliers to source goods and services in a manner that aligns with our policies including our Anti-Slavery Policy. We encourage our suppliers to promote best practice and continuous improvement, require our suppliers to comply with certain minimum standards and provide Assetlink with rights of termination if the supplier is unable or unwilling to work towards full compliance with these minimum standards.

2. Training and Capability building

Assetlink maintain ongoing focus on training and capacity building. Modern Slavery awareness training has been deployed through all entities, together with awareness of Whistle blower hotline and procedures.

3. Reporting and monitoring of grievance mechanisms

Assetlink has a Whistle blower Hotline in place as well as an internal process for lodging any grievance. The Whistle blower hotline is an external confidential service. Any complaints are reported and reviewed by the Modern Slavery Committee and Executive Leadership Team. This may be incorporated in the Corporate Risk monthly report. Any matters that need further escalation are reported to the Board.

In FY22, progress of Training Completion (Modern Slavery) was monitored and reviewed. This will be formalised in the FY23 as a Modern Slavery performance Lead indicator.

Additionally, in FY22, where clients had their own Whistle blower access points, this was also communicated to Team Members based at those sites.

SECTION 4 – Assessment of Effectiveness

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Section 4: Assessment of Effectiveness

This is Assetlink's third iteration of our Modern Slavery Statement and outlines the steps we are taking to ensure the elimination of servitude in all its forms are not present within the Assetlink Group or through our supply chains.

In the FY22 reporting period, effectiveness of our Modern Slavery actions were validated through,

- Positive feedback from Client audit via Tier 1 consultancy firms.
- Overhaul and review of the Modern Slavery Risk Assessment, ensuring actions were fit for purpose and inclusion of Assurance actions against the
- Deployment of an enhanced Supplier Evaluation survey to gain objective data on our supplier risks.
- Agreement and initial publish of Modern Slavery Performance Indicators

Improved training completion in Modern Slavery, inclusive of grievance and whistle blower procedures.

While we recognise we still face many challenges as our awareness and maturity in Modern Slavery increases, we remain confident that our current assessment of risk and our policies and procedures create strong foundations by which we will continue to improve.

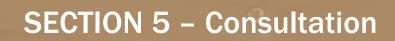
Through regular internal and external assurance, audits of our suppliers, training and capability building, the close and long-standing relationships we have with our suppliers, and the processes we've put in place with regard to providing employees and suppliers with an external Whistle blower hotline and grievance procedures, we are able to continually monitor where we and our suppliers are with regard to modern slavery risks.

In FY22, we continued our track record reporting zero modern slavery complaints against Assetlink, or our suppliers, made through internal or external channels such as our Whistle blower hotline.

Auditing Suppliers

Offsetting the risk of unethical practices occurring within our supply chains, we apply our own modern slavery and ethical sourcing audit programs using a risk-based approach.

Where non-compliance with Assetlink's Anti-Slavery Policy is identified, the supplier is contractually required to remediate the issue. If a supplier then addresses non-compliance, it continues to be an approved supplier. If a supplier is not willing or unable to address a critical breach, we will not continue to engage with that supplier.





Section 5: Consultation

Assetlink Group Entities:

Section 1 detailed the organisation structure for the Assetlink Group and the related entities aligned to the submission of this Modern Slavery Statement.

With common, shared services across the group (Finance, Payroll, Safety and Risk, Human Resources, Information Technology) and group-wide Management Systems detailing our policies and procedures, all Assetlink entities, including our New Zealand operations, meet the requirements of the Group Modern Slavery objectives.

Consultation and awareness of expectations are achieved through representation on the Executive Leadership Team, overseen by the Group Managing Director and CEO.

Third Parties:

Relationships and collaboration with our suppliers, business partners and relevant government agencies assist us shaping our strategies on modern slavery.

As a member of the Supply Chain Sustainability School of Australia (SCSS) we aligned to the SCSS objectives of creating sustainable supply chains for the property, construction, and infrastructure industries in Australia.

Our membership provides collaborative, accessible education to realise this future vision. Pleasingly, many of our clients are members of SCSS and together with their internal forums, we can collaborate on how we go forward together in the fight against modern slavery.

Some Clients have created regular meeting events to engage and connect on Modern Slavery. These forums allow us to share progress with our initiatives, understand client need and leverage identified best practices from other suppliers.

SECTION 6 – Training and Capability Building



Section 6: Training and Capability Building

Awareness-raising is crucial in helping prevent and address modern slavery in our business and supply chain.

Assetlink's Modern Slavery awareness online training module has been launched and is mandatory for all employees and suppliers. When commencing employment with Assetlink, our people complete training on our Standards of Business Conduct as part of their induction process. Compulsory refresher training is undertaken annually.

We revised and developed, consulted, communicated and rolled out new and refresher policies and documents including our Anti-Slavery Policy, Whistle blower hotline, Business Code of Conduct, Corporate and Social Responsibility Policy (includes amongst other things - Workforce Stewardship, Freedom of Association, Sustainable Supply Chain, Corruption, Bribery, Distortion, Labour Standards and Human Rights), Inspections, Audits, Complaints and Improvements Policy, Diversity & EEO Policy, Grievance Procedure, Employee Management Policy, supplier audit procedures and related processes, which detail our expectations around modern slavery, sustainable procurement and supplier conduct.

In FY21 Assetlink deployed the online Procurement induction and training module, guiding targeted employees through our standardised procurement framework, related tools, reinforcing the need to incorporate modern slavery into procurement planning.

SECTION 7 – Looking Forward



Section 7: Looking Forward

Assetlink will continue to ensure the prevention of modern slavery throughout our business and with those we work with. Bettering our performance and aligned to our modern slavery risk assessment, initiatives planned for FY23 to further eradicate Modern Slavery, include:

Dimension	Actions Planned for FY23
Risk Identification & Governance	 Publish Modern Slavery performance indicators in monthly corporate risk reports. Validate risk controls through audit. Detail enhancements to risk management in FY23 statement. Document governance structure and publish in FY23 statement.
Audit & Assurance	 Continually review existing controls. Enhance assurance actions, documenting all activities to validate controls are in place and effective. Incorporate Modern Slavery as a risk type in our Corrective Action system. Sustain track and record of no major non-conformances.
Client Engagement	 Include snapshot of Modern Slavery performance in client performance reviews. Further explore and align with more client's whistle-blower programs
Training & Education	Publish training performance monthly.Drive completion by entity.
Supply Chain	 Complete assessment of all Suppliers Embed Modern Slavery assessment into onboarding actions for new suppliers. Undertake audits of high-risk Tier 1 suppliers
Contractual & Commercial Obligations	Ensure all new and existing clients have updated contracts that are inclusive of modern slavery expectations.
Recruitment & Human Resources	 Enhance grievance procedure. Update and strengthen related policies (EEO etc.,) to incorporate more explicit Modern Slavery references. Document response procedure to Modern Slavery breaches Explore payroll system enhancements

Progress to our FY23 objectives will be via the Modern Slavery Committee and improvements measured through Performance Indicators.

End of Statement



Version History

Reporting Period	Summary of Changes / Edits	Author
FY20	Initial Release	Janine Rauscher
FY21	 Confirmed content. Minor formatting changes to improve readability. Added Author and Contact details. Reflected FY21 actions/achievements 	Chris Dow
FY22	 Complete review of all sections Update of content to reflect practices. Readability improvements Highlight boxes to detail achievements of the reporting period. 	Chris Dow

AUSTRALIA

New South Wales

6/2-12 Tennyson Road, Gladesville NSW 2111 T +61 2 9857 7100 F +61 2 9877 5888

Victoria

198A Turner Street, Port Melbourne VIC 3207 T +61 3 9682 6066 F +61 3 9645 8049

Queensland Unit 5, 29 Links Ave Nth, Eagle Farm QLD 4009 T +61 7 3868 4099 F +61 7 3868 4299

Western Australia Unit 25, 25 Walters Drive, Osborne Park WA 6017 T +61 8 9244 4151

South Australia 33/ 283-287 Sir Donald Bradman Drive, Brooklyn Park SA 5032 T +61 3 9682 6066 F +61 3 9645 8049

NEW ZEALAND

Auckland Suite 913A, Botany Town Centre, 588 Chapel Road, East Tamaki 2016 T +64 9 265 2744

