

Modern Slavery Statement 2020

This statement is made by Grindley to reflect our approach to the management of the issue of modern slavery and to comply with Section 14 of the Modern Slavery Act (Cth) (Act).

Modern slavery is where coercion, threats or deception are used to exploit people and deprive them of their freedom. Grindley acknowledges that we operate in an environment that is potentially exposed to the risks of modern slavery. We are committed to fulfilling all legislation and regulatory requirements, while striving to uphold the values that respect human rights.

Reporting Entity and Structure

Grindley Construction Pty Ltd ACN 003 586 687 and Grindley Interiors Pty Ltd CAN 148 960 730, are an Australian owned construction companies collectively known as Grindley based in Sydney, NSW. Both entities have a common owner and directors and share the same management system. This is a joint statement made on behalf of both, Grindley Construction as a reporting entity and Grindley Interiors as a voluntary reporting entity in accordance with the Act.

Grindley operate within the aged care, retirement, education, commercial and industrial sectors, predominately as a builder/head contractor. As a head contractor, Grindley routinely engage other suppliers and subcontractors to assist us with executing the services we provide. Grindley operate a management system that is certified to AS-NZS ISO standards Quality 9001-2016, Safety 45001-2018 and Environmental 14001-2016.

Operations and Supply Chains

A majority of our expenditure is associated with construction projects, where a Client engages us to execute the new construction or refurbishment of a building. Expenditure is therefore on behalf of our Clients, typically via the engagement of others such as subcontractors, suppliers and consultants who assist us with executing the services we provide.

Supply chains are complex in nature and with the majority of design and selection works being completed by consultants outside of our organisation, the risk is that we lose exposure to the data and decisions made within those external organisations and there becomes an increased requirement for consultation.

Risks of Modern Slavery

Grindley have commenced and continue to develop a risk assessment to assist with identifying risks associated with modern slavery. Both corporate and project based expenditure has been considered so to as assist with differentiating the complexities in the associated supply chains.

Areas identified of initial focus have been:

- Suppliers of labour that are under the direct supervision of Grindley
- Suppliers of raw material, including Subcontractors who supply material as part of their works
- Suppliers of pre-fabricated / assembled materials and products for incorporation into our projects

Actions

Grindley have conducted and will continue to review our management system to identify areas of improvement for compliance with legislation and regulation and to uphold the values that respect human rights. Actions taken assist to with managing the risk associated with modern slavery to date include:

- Implementation of the initial Human Rights Policy and since Version 2
- Improved procurement procedures to assist with identifying organisations that do not align with the principles of human rights and or comply with legislation and regulation.
- Improved sub-contracting terms to assist with mitigating the risks and ensuring awareness of the Modern Slavery Act by those that we contract with.
- Reviewed our Workplace Relations Management Plan and continue to with associated procedures with a focus on improving whistle blower opportunities and remediation processes
- Incorporation of modern slavery into our monthly management meeting
- Increasing awareness of both direct employees and those we engage regarding the requirements of our management system re modern slavery

Upcoming, our immediate focus will be on expanding our knowledge re:

- Greater understanding of our supply chains
- Progressing our auditing procedures
- Exploring the availability of training
- Continuing to raise awareness of modern slavery risks including the updating of our project based inductions

Effectiveness

The above actions have been implemented effectively and this has been seen especially through the procurement process. A number of organisations have been identified as needing further knowledge of modern slavery and the associated risks. Although we understand our limited influence on our current supply chains notably those outside of Australia regarding eliminating modern slavery risks, it is our responsibility, to influence and make others aware of these requirements, prior to entering supply and/or consultancy agreements with other parties.

We uphold the values that respect human rights and will continue to strive for improvement of and limiting the risks of modern slavery. We endeavour to continue to ask questions of ourselves, those we engage and our clients, noting that a collective effort from all will ultimately be the most effective way of striving to eliminate modern slavery.

Consultation

The responsibility of consultation has been taken on by WHSEQ (Work, Health Safety, Environmental and Quality) Managers. Our WHSEQ Managers are part of senior management and are in constant consultation with our Directors and formally reporting at our monthly management meeting.

Other Relevant Information

Grindley believe that to be environmentally and socially responsible we need to think beyond the job at hand, both for a sustainable future and the good of the community. We are fully committed to meeting the needs of our clients without hindering the ability of future generations to meet their own needs. Our commitment is to act responsibly, to encourage a positive impact on the environment, our clients, our employees and the communities we work with. We will continue to support a range of charities and organisations through donations, sponsorships and community events and support our professional networks through involvement in industry organisations and peak bodies. Striving to eliminate modern slavery has therefore naturally fallen within the environmental and social responsibility commitment our business has undertaken.

This Statement has been approved by the Board of Grindley Construction and on behalf Grindley Interiors on 25th of March 2021.



Matthew Macauley
Chief Executive Officer/Director