

Modern Slavery Statement

2024



paynter
dixon

About our business

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

Celebrating 110 years of continuous operation, the Company has a long heritage in partnering with clients to design, build and deliver high-quality and cost-effective projects which enhance their business.

In addition to numerous market firsts and innovations, the Company was responsible for introducing the Design and Construct system to Australia in the 1940s. This approach led to superior quality and safety standards within the domestic construction industry by creating a single point of contractual responsibility from concept design to building completion.

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, Sydney NSW (head office)
- / Adelaide, SA
- / Albury, NSW
- / Canberra, ACT
- / Coffs Harbour, NSW

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.

Hospitality – Petersham RSL Club

Addressing the risks

Assessing the risk of modern slavery practices

During the reporting period and continuing into 2024, the following steps are being taken to improve the Company's understanding of and capacity to identify and manage modern slavery risks:

- / Review of existing information on supply chains.
- / Creation of an in-house ESG Committee. The purpose of the committee is to assist the business in fulfilling its oversight, compliance and ethical responsibilities regarding ESG matters, including, but not limited to, environmental, health and safety, corporate social responsibility, sustainability, philanthropy, and corporate governance matters such as the Modern Slavery Act.
- / Staff training.
- / Regularly engaging with suppliers.

Potential risks:

- / In our policies and processes when onboarding subcontractors, we confirm that subcontractors comply with relevant labour laws.

Assessing the risk of modern slavery:

- / We are currently reviewing our subcontractor and consultancy agreements to include standard modern slavery terms and conditions.
- / We also have a Whistleblower Policy where allegations about modern slavery can be made.



Remedial – Hyde Park Plaza

Assessing our actions

Assessing the effectiveness of our actions

We plan to act on our previously communicated actions and plans in 2024.

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.
- / Utilising the ESG Committee to assess and monitor the above.

Education – Maitland Christian School

Consultation

Consultation

The Company adopts a collaborative approach to combating modern slavery.

This collaboration occurs by:

- / Ensuring ongoing and meaningful dialogue occurs between entities on a regular basis.
- / The People & Culture team meet regularly with the Procurement team and regularly brief the Group's board on any relevant items of concern.
- / The introduction of the ESG Committee will ensure that regular and formal consultation occurs with the business and the Board. The ESG Committee's commitment 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 by the ESG Committee to ensure it remains effective throughout the course of the following reporting period.



Health – St Vincent's Hospital

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 18 December 2023.



James Boyd
Executive Chairman
Paynter Dixon Management
Services Pty Limited
18 December 2024



James Boyd
Executive Chairman
Paynter Dixon Pty Limited
18 December 2024

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