

Modern Slavery Statement

Grindley is **Committed** to taking all reasonable steps for ensuring that the goods and services procured by Grindley are not the product of modern slavery. Grindley has a legal and ethical obligation for considering, identifying, managing, and reporting on modern slavery risks within Grindley's supply chains in accordance with the Modern Slavery Act (NSW) 2018 and Modern Slavery Amendment Act 2021.

Modern Slavery is a serious violation of an individual's dignity and human rights. It is a term used to describe situations where coercive, threatening, and deceptive practices are used to exploit victims and undermine them of their freedom. The term Modern Slavery refers to several offences including:

- Slavery, servitude, forced labour, deceptive recruiting for labour or services, forced marriage
- trafficking in persons, trafficking in children
- debt bondage
- sexual servitude
- forced child marriage
- the use of a child in the production of child abuse material and related offences
- the slavery, servitude or forced labour of a child.

With this Modern Slavery Statement, we identify the risk it poses on our organisation, the actions we implement to mitigate and prevent modern slavery.



This modern slavery statement has been prepared as joint statement of Grindley Construction Pty Ltd and Grindley Interiors Pty Ltd.

1. Reporting Entity

Reporting Entities	Grindley Construction Pty Ltd (ABN: 42 003 586 687) Grindley Interiors Pty Ltd (ABN: 73 148 960 730)
Head Office	Ground Floor 55 Grandview Street, Pymble NSW 2073
Website	grindley.com.au
Financial Year	July 2023 - June 2024
Published Date	August 2024

2. Grindley’s structure, operations, and supply chains

Structure

Founded in 1988 by Alan Carstens, Grindley Construction Pty Ltd is an Australian owned Construction group renowned for its expertise in the aged care, retirement, education, commercial, and industrial sectors. We take pride in being selected by our clients in our proven track record in delivering projects that exemplify exceptional quality and outstanding value.

In 2011 - Grindley interiors Pty Ltd was launched, specialising in high end fit outs, refurbishments and building upgrades. Grindley Construction and Grindley Interiors are collectively known as Grindley.

Operations

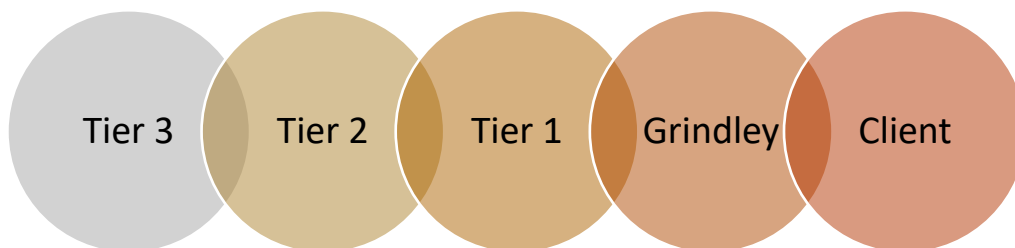
With exceptional delivery of meeting our clients’ needs in the various sectors we serve, our clients are based in the Sydney Metropolitan, Greater Sydney, and Regional New South Wales. With our head Office located in Pymble, New South Wales, it employs just over 110 employees.

Supply Chains

As a head contractor we coordinate the services of subcontractors & suppliers to complete the projects works. Most of our subcontractors are small to medium sized entities (less than \$100m turnover) who are not required to complete a Modern Slavery Statement; however, they are to adhere to contractual agreement to follow Grindley’s requirements, policies and procedures when carrying works within our projects.

Our suppliers are predominately located within New South Wales.

Below is a breakdown of our supply chain in the simplest of terms.



Client
Grindley Construction Pty & Grindley Interiors Pty Ltd
Tier 1 – Construction Labour & Supplier
Tier 2 – Manufacturer | Manufactured Products
Tier 3 – Raw Materials: Bricks, cement, rubber, timber, carpet, glass, paint, steel, tiles, ceramic

3. Identified Risks

While it may not be possible to completely eradicate modern slavery, we have identified risks within our operations. These risks can affect various aspect of our organization, including safety, quality, environmental impact, and financial stability. Most importantly, they have a direct impact on the well-being of those who work alongside us.

The identified risks are categorized based on our involvement, whether we contribute to, cause, or are directly linked to them.

Modern Slavery	Risks linked to Grindley
Migrant Worker Vulnerability <i>Contributes</i>	The exploitation of migrant workers, especially those with visas, language barriers, lack of awareness of their own rights, and potential legal status issues. Workers in these sectors often face hazardous working conditions, low wages, and limited labour protections.
Training and awareness gaps <i>Contributes</i>	We acknowledge not all employees may have completed a credible modern slavery training and contractors who are onsite may not be informed about Modern Slavery. Inadequate training and awareness of employees and contractors that are onboarded onsite of their working rights.
Complex supply chains <i>Contributes/ Linked</i>	Low visibility of labour practices in complex supply chains. Difficulty to trace and monitor when their supply chains extend to different regions or countries for procurement in products.
Multi-layered subcontracting <i>Linked</i>	During the contractual phase of a project, we have witnessed an increase of multi-layered subcontracting. Contractors may extend their supply chain and outsource their labour to smaller entities that may not enforce labour rights or have ethical codes of conduct. We may not be visible to these contracts but there is a here is a lack of visibility on their ethical practices.

4. Actions undertaken in FY23-24

To address and prevent modern slavery, we have established a framework that underpins our commitment to ethical practices and human rights. We are actively working to identify and mitigate risks within our organization. Our ongoing efforts are designed to ensure that our operations and partnerships adhere to the highest standards to safeguard the well-being of everyone involved.

Limited contractor selection	Invitation only to tender submissions with trusted contractors. We have built a rapport with contractors we continually s
Subcontractor Screenings	During submissions and offers, contractors and suppliers are requested to complete a questionnaire outlining any acknowledgement of Modern Slavery within its organisation. Although they are not required to submit a statement, they are to adhere to Grindley's requirements, policies, and procedures as well as all relevant local laws when working on our projects.

Policies	We address modern slavery by actively reviewing and updating our Human Rights Policy. By scheduling regular review dates to ensure alignment with the Australian Human Rights Commission guidelines, we can identify, prevent, mitigate human rights risks, including modern slavery, within our business.
Management	Incorporating Modern Slavery into Management meetings to address how as an organisation we are achieving our goals to mitigate and prevent Modern Slavery in our workforce.

We also aim to enhance our practices, as detailed in Section 7 of this statement.

5. Assess the effectiveness

During this reporting period, we focused on evaluating how our current indicators measure the impact of the actions we have implemented within Grindley. Guided by Commonwealth Modern Slavery Act 2018 resources, we aim to enhance these measures to ensure a more accurate assessment.

Our measures are calculated utilising the following actions:

Subcontractor Screenings	The Internal assessments conducted on tier one supply chains creates transparency when works are outsourced to smaller entities. With the data received from this assessment it can help identify, measure, and compare the trades with their competitors on their understanding and actions towards modern slavery.
Research & Review	Comparing our performance and practices against industry benchmarks, best practices, and revolving standards.
Training and awareness	Assessing the level of awareness and the understanding of modern slavery through site inductions. Creating reports based on the knowledge collected from project inductions and tender questionnaires.

6. Consultation

We have engaged extensively with the senior management teams, directors, and key stakeholders of both entities to review our reporting obligations. We have provided them with comprehensive materials and updates regarding the actions we are taking to address these requirements effectively.

7. Other Relevant Information – Improvements

Based on our analysis and consultations with both entities regarding the identification, assessment, and management of modern slavery risks, we are poised to implement these enhancements in the near future.

- Enhance our current procurement procedures and measuring their effectiveness in reporting Modern Slavery Risks.
 - Training & Awareness – Increasing awareness and training
 - Periodically update our current policies to reflect the current environment, including our Modern slavery, Human Rights and Whistleblower policies.
 - Formalising a grievance and remediation framework to install within our ethical policies.
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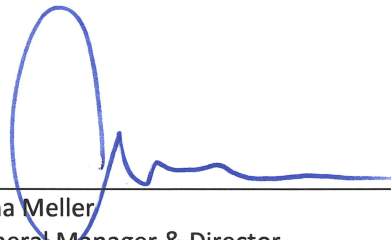
At Grindley, we believe that true environmental and social responsibility extends far beyond our immediate tasks; it encompasses a vision for a sustainable future and the well-being of the communities we serve. We are unwaveringly dedicated to fulfilling our clients' needs while ensuring that we do not compromise the ability of future generations to meet their own. Our commitment is rooted in responsible action and the pursuit of a positive impact across all areas: the environment, our clients, our employees, and the communities we engage with.

Our commitment to eradicate modern slavery, aligns seamlessly with our broader commitment to our environmental and social responsibility. Through these efforts, we strive to make a meaningful difference and drive positive change in every facet of our operations.

This statement was approved by the governing body of Grindley Construction Pty Ltd and Grindley Interiors Pty Ltd on 23rd August 2024.



Matthew Macauley
Chief Executive Officer & Director
Grindley Construction Pty Ltd



Asha Meller
General Manager & Director
Grindley Interiors Pty Ltd