

## Modern Slavery Statement 2022

### The Burbank Group of Companies

An Australian family business group comprised of the award-winning Burbank Homes and subsidiary companies, covering the full spectrum of building industry services. With the expertise and resources to provide end to end solutions for our customers and a scope that covers land acquisition, finance through to turnkey solutions, the Burbank Group of Companies continues to revolutionise the idea of what it means to be a home and property group.



### Introduction

The purpose of this statement is to outline our approach to ensure the Burbank Group of Companies (Burbank) has comprehensive framework and process in place to minimise the risk of modern slavery in our business operation and supply chain.

Burbank acknowledges that slavery can occur in many forms as detailed in the Modern Slavery Act including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting.

Burbank is committed to operating responsibly, with the goal of identifying and working with its supply chain to prevent the various forms of slavery.

This statement covers the activities of the following Burbank Group Entities:

- Burbank Australia – ABN 91 007 099 872
- Burbank NSW/ACT – ABN 88 610 822 770
- Burbank QLD – ABN 77 103 014 615
- Burbank SA – ABN 96 165 533 406
- Burbank Urban – ABN 91 007 099 872
- National Pacific Properties ABN 97 143 678 433
- National Pacific Finance ABN 32 168 530 961
- Storage Box ABN 49 535 934 812
- Burbank Air Services ABN 85 150 346 277
- Dynamic Trade Solutions ABN 83 098 221 991
- Beacon Building Services ABN 74 165 292 311

### Our Business, Operations and Structure

The Burbank Group of Companies have our Head Office located in Victoria.

Our core business is home construction with subsidiary companies that include land development, finance, electrical and plumbing companies, offering a complete property and construction solution for customers.

We operate across the eastern seaboard into South Australia, for more information on the Burbank Group of Companies visit [www.burbankgroup.com.au](http://www.burbankgroup.com.au)

Entity	Operational Structure	Supply Chain Map
<b>Burbank Australia</b> <b>Burbank NSW/ACT</b> <b>Burbank QLD</b> <b>Burbank SA</b> <b>Burbank Urban</b>	Design, market and construct low rise residential dwellings on customers land or part of a house and land package. Construct low rise residential development in partnership with developers	<ul style="list-style-type: none"> <li>• Office consumables and uniforms</li> <li>• Promotional and marketing materials</li> <li>• Technology (hardware, software, cloud services)</li> <li>• Utilities</li> <li>• Professional services consultants/organisations/contractors, including recruitment firms, law firms, agents, engineers, building surveyors, designers, and IT and HR professionals</li> <li>• Sub-contractors who work on home construction, including arborists plumbers, electricians, gasfitters, drainers, tilers, carpenters, cleaners, plant equipment, painters, concreters, traffic management, bricklayers, plasterers, caulkers, levellers, sanders, renderers)</li> <li>• Home construction goods and materials (including soil reports, land surveys, energy assessments, CCTV, power pits, bins, tanks, pumps, paint, concrete, rock, steel, timber, joists, roof trusses, beams, lintels, bricks, Hebel, cranes, waterproofing, windows, door frames, doors, bricks, brick sand, eaves material, fascia gutter, flashings, tiles, roofing, floor material, cladding, lock up material, mouldings, screens, insulation, plaster, fixing material, basins, sinks, cabinetry, benchtops, cooking and kitchen appliances, dishwashers, heating, cooling, vacuum systems, plumbing units, hot water units, rangehoods, stairs, lights, stone, wallpaper, mirrors, shelves, electronic systems, baths, showers, sanitaryware, electrical fittings, antennas, fit off materials, carpets, balustrades, caulking, clotheslines, decks, letterboxes, fencing, flyscreens, window furnishings, scaffold, guard rails.</li> </ul>
<b>National Pacific Properties</b>	Purchase and develop land holdings for future development and develop land parcels in partnership with developers in readiness for construction. Operations in Victoria.	<ul style="list-style-type: none"> <li>• Office consumables and uniforms</li> <li>• Promotional and marketing materials</li> <li>• Technology (hardware, software, cloud services)</li> <li>• Utilities</li> <li>• Professional services consultants/organisations/ contractors, including recruitment firms, law firms, agents, engineers, building surveyors, designers, and IT and HR professionals</li> <li>• Sub-contractors who work on home construction, including arborists plumbers, electricians, drainers, plant equipment, road construction &amp; landscapers.</li> </ul>
<b>National Pacific Finance</b>	Customer finance brokerage. Operating in QLD, NSW/ACT, VIC & SA	<ul style="list-style-type: none"> <li>• Office consumables and uniforms</li> <li>• Promotional and marketing materials</li> <li>• Technology (hardware, software, cloud services)</li> <li>• Utilities</li> <li>• Professional services consultants/organisations/financial institutions.</li> </ul>
<b>Storage Box</b>	Self-storage facility operating in Victoria's western suburbs	<ul style="list-style-type: none"> <li>• Office consumables and uniforms</li> <li>• Promotional and marketing materials</li> <li>• Technology (hardware, software, cloud services)</li> <li>• Utilities</li> <li>• Truck</li> </ul>
<b>Burbank Air Services</b>	Burbank Group aviation wing established primarily for internal, corporate, government, media, and associated entities.	<ul style="list-style-type: none"> <li>• Office consumables and uniforms</li> <li>• Promotional and marketing materials</li> <li>• Technology (hardware, software, cloud services)</li> <li>• Utilities</li> <li>• Aircraft</li> <li>• Aviation services</li> <li>• Airports Services</li> <li>• Financial institutions</li> </ul>

<b>Dynamic Trade Solutions</b>	Electrical & technology fit outs for residential, commercial, and industrial premises operating in Victoria, QLD& SA	<ul style="list-style-type: none"> <li>• Office consumables and uniforms</li> <li>• Promotional and marketing materials</li> <li>• Technology (hardware, software, cloud services)</li> <li>• Utilities</li> <li>• Electrical fittings, cable, enclosures, supplies ....</li> <li>• Vehicles</li> <li>• Professional services consultants/organisations/financial institutions</li> </ul>
<b>Beacon Building Services</b>	Residential and commercial refurbishment and fit out operating in Vic & NSW	<ul style="list-style-type: none"> <li>• Office consumables and uniforms</li> <li>• Promotional and marketing materials</li> <li>• Technology (hardware, software, cloud services)</li> <li>• Utilities</li> <li>• Building, recourses (as per Burbank residential construction profile)</li> <li>• Vehicles</li> <li>• Professional services consultants/organisations/financial institutions.</li> </ul>

### Modern Slavery Operational & Supply Chain Risk Profile

Burbank sources its products through local suppliers and abides by fair work legislation nationally, this reduces the opportunity of modern slavery to occur in the first instance.

However, Burbank recognises that modern slavery is complex issue and can occur and several points in the supply chain or business process despite current legislative requirements.

Burbank has completed a risk review of its current structure and potential exposure areas and have determined the following areas as have a low risk in breaching the 2018 Modern Slavery Act.

- Burbank Group employed staff, contractors, and consultants. As these are managed in house through corporate services.
- Site based contractors and where our contractors further subcontract the work, under payment was identified as the greater risk which does not constitute modern slavery.
- Property development at this stage only occurs within Australia where the directors have a clear oversight of the operations.
- The financial brokerage arm engages financial institutions that have a base in Australia, who are government by local laws.
- Storage Box is a wholly own subsidiary that only engages local resources.
- Air services only operates within Australia using local suppliers and resources.
- Beacon Building Services has a similar exposure profile as the residential construction arm of the Group of companies.

The Burbank Group is aware that modern slavery is a complex issue and can be difficult to detect and manage in a complex and global environment. Some of our material suppliers who source products or components from overseas, may have modern slavery concerns. Burbank have addressed these in the next section Risk Management and Due Diligence.

### Risk Management and Due Diligence

To manage the risks of modern slavery in our supply chain, the Burbank Group of Companies have completed the following measures:

- Introduced a modern slavery statement in all new supply agreements.
- Introduced a modern slavery statement to existing suppliers on their contract renewal.
- Implemented a modern slavery training program to educate it staff on how to identify modern slavery, its impacts and risks of modern slavery.

## Modern Slavery Working Group

Corporate services have a well-established governance committee who have oversight of the Burbank Group of Companies. The Governance committee comprise of the Burbank Group Chief Financial Officer, head of People Culture Performance, Executive Team representative, head of Risk & Compliance and Legal Counsel.

## Disclosure

The Burbank Group has in place a whistle-blower policy to protect and provide the mechanism in which any staff member can disclose any unlawful, unethical, or improper conduct without recourse.

The policy provides the framework and information on the mechanisms in place to report and ensure the rights and wellbeing of the person is protected.

## Procurement

Each group entity has a dedicated person who governs direct supplier agreements. All supply agreements have a requirement on the incumbent supplier or service provider to ensure the principles of the Modern Slavery Act are adhered to regardless of the turnover of the business entity.

## Contractor Onboarding and Management

The Risk & Compliance team manage the onboarding of external contractors for all but one of the Burbank Group entities. There is an initial business prequalification system, then each person within the approved entity is inducted into the Burbank Group of Companies. This provides an independent review and assessment for each contracting organisation. Also provide a direct communication channel to onsite workers.

## Consultation Process with Group Entities

The Burbank Group entities are owned by one Managing Director who has the controlling interest across all Burbank Group entities. The Managing Directors and General Managers of the Burbank Group entities are provided the opportunity for consultation and review of the Burbank Group Modern Slavery Statement.

## Impact of COVID-19

A COVID-19 management and strategy team was in place on the first instant that it was realised that COVID-19 had the potential to become a threat to our people and supply lines. Early communication, intervention, and planning has ensured business continuity throughout the pandemic.

A comprehensive COVID-19 safe operating plan and procedures were implemented across all our sites, offices, and display centres. The operating plan included, training, social distancing, hygiene, and staff care plan and shutdowns where required.

## Future Commitments

Burbank will continue to collaborate with its stakeholders to prevent and address any contribution that Burbank may have to the global issue of modern slavery.

Burbank will achieve this by focusing on raising awareness of the forms of modern slavery among our employees and suppliers, continuing to evolve our due diligence processes to aid in the identification of risks, expanding the scope of our supply chain risk assessment, reviewing existing processes and exploring ways to improve identification and action on risks throughout our supply chain.

This statement was approved by Jarrod Sanfilippo as the principle governing body of:  
Burbank on the 9/12/2021

Jarrod Sanfilippo .....  
Group Managing Director