

INFINITY

MODERN SLAVERY STATEMENT

FY 2022

INFINITY CONSTRUCTIONS GROUP



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INTRODUCTION



It is estimated that 40.3 million people around the world and at least 15,000 people in Australia live in slavery like conditions.

RESPECTING HUMAN RIGHTS

Human Rights are a set of principles concerned with equality and fairness.

We must respect, uphold and advance human rights in everything that we do. We acknowledge that our activities have the potential to impact human rights and we manage this through our core business practices.

Preventing and addressing our own involvement in modern slavery is central to our sustainability approach including our commitment to running a safe, responsible and profitable business.

We set clear expectations to our employees, partners, subcontractors and suppliers that they should be alert to possible involvement in modern slavery and work to prevent and address it.

The introduction of the Modern Slavery Act 2018 (Cth) (the "Act") – a move Infinity Constructions Group welcomes – illustrates the Australian Government's commitment to taking action against the issue and signifies that modern slavery is wholly unwelcome within the Australian community.

As an Australian construction contractor, we acknowledge that our business operates within a modern slavery risk industry and recognise that our operations therefore have the potential to have genuine impact.

As this Statement shows, we reaffirm our commitment to long-term continuous improvement in our operations to ensure that we are contributing to the collective goal of ending modern slavery.

This Statement was approved by the Infinity Constructions Group's Board of Directors on 24 June 2022. The Statement was approved on behalf of the joined reporting entities.

Infinity's goal is to eliminate modern slavery in its operations and supply chains. Achieving our goals continues to be a multi-year project and requires all of us to work together to protect the rights of all vulnerable people.



Alan Yazbek

Managing Director; Infinity Constructions Group

13/09/2022



**OUR STRUCTURE,
OPERATIONS &
SUPPLY CHAIN**

OUR STORY

Infinity is an Australian Construction Company with offices in Sydney and Melbourne. We operate in 2 main sectors:

- Commercial
- Industrial

Specifically, in construction of offices, hotels and hospitality, health and aged care, education, defence, industrial warehouses, student accommodation, build-to-rent and community and luxury bespoke projects.

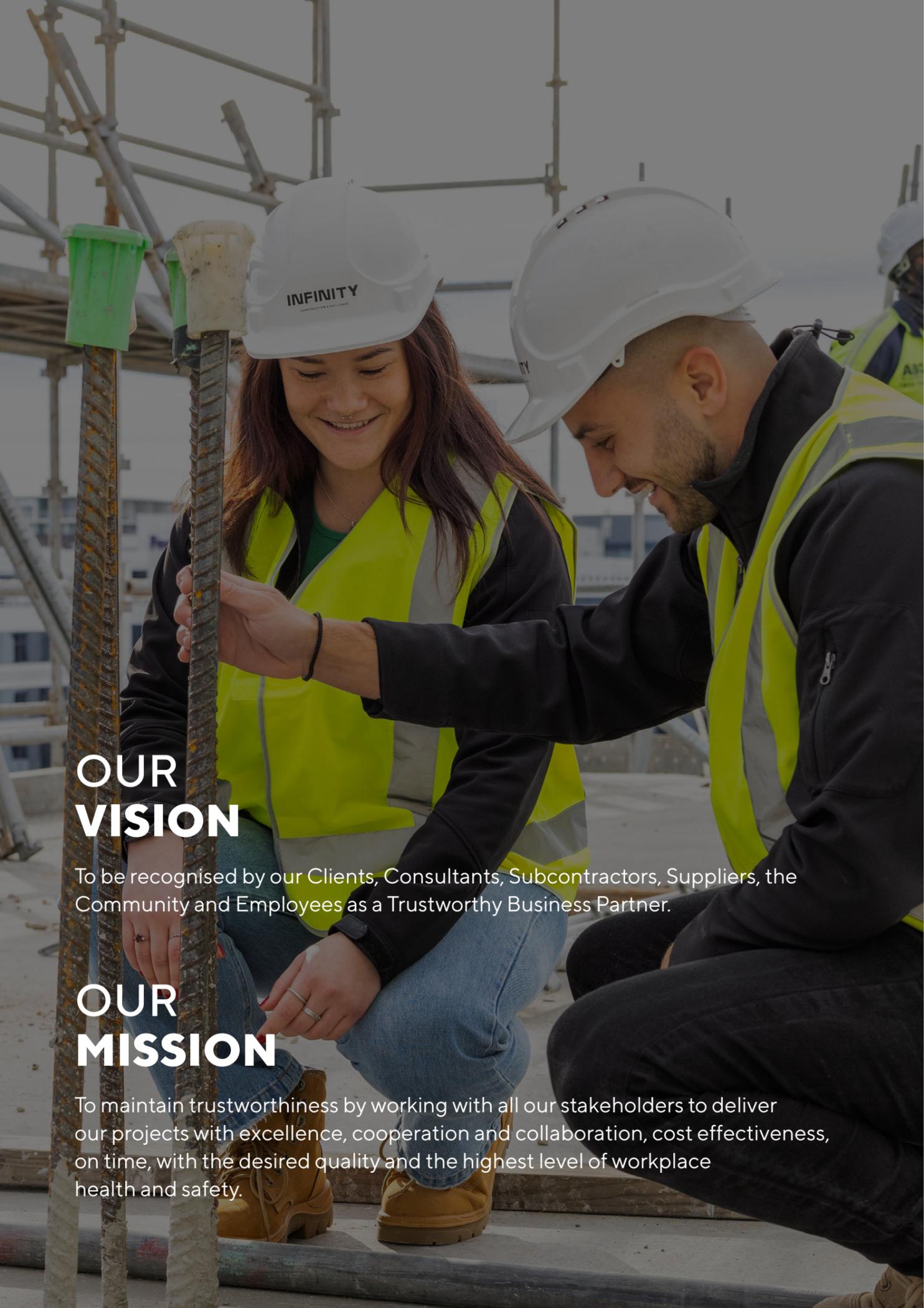
Infinity was established in 1992 and has developed a reputation for undertaking difficult construction projects with an emphasis on safety, environmental management, quality, timely completion and smart engineering. We are the contractor of choice for a number of leading architects, developers and clients.

This Statement is made by Infinity Constructions Group Pty Ltd (ABN 95 111 941 792) for the year ended 30 June 2022 pursuant to the Modern Slavery Act 2018. (Cth)(Modern Slavery Act).

Infinity Constructions Group Pty Ltd is a privately held company committed to driving positive change in the Australian Construction Industry (predominately in NSW).

This statement sets out what Infinity Constructions Group Pty Ltd has done in the Financial year 2021/2022 to work towards ensuring that slavery and human trafficking is not taking place in any part of its business or supply chains.





OUR VISION

To be recognised by our Clients, Consultants, Subcontractors, Suppliers, the Community and Employees as a Trustworthy Business Partner.

OUR MISSION

To maintain trustworthiness by working with all our stakeholders to deliver our projects with excellence, cooperation and collaboration, cost effectiveness, on time, with the desired quality and the highest level of workplace health and safety.

OUR VALUES

Our core values are the building blocks to the success of Infinity, guiding our name to be synonymous with quality projects and construction. These values define Infinity and how we conduct our business. Since our inception, Infinity has earned its reputation in both the industry and wider community.

SAFETY

Safety is everyone's responsibility and will always take priority over all other considerations. Safety is at the heart of everything that we do.



SUSTAINABILITY

Our business must always remain sustainable. Sustainability is achieved when all our processes come together to deliver efficiency and value.



ACCOUNTABILITY

We are accountable for the buildings we build, the way we operate and the outcome of our actions. Our buildings are there for the long-term and we respect our clients and those who occupy the buildings.



TRUSTWORTHINESS

We are accountable for the buildings we build, the way we operate and the outcome of our actions. Our buildings are there for the long-term and we respect our clients and those who occupy the buildings.



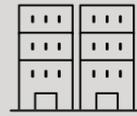
**IDENTIFYING RISKS OF
MODERN SLAVERY
IN OUR SUPPLY CHAIN**



OUR OPERATIONS



500+
Projects built



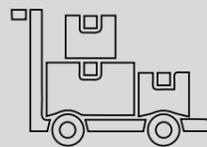
2
Office locations
(NSW & VIC)



80+
Infinity Employees



50+
Locations across
NSW & VIC



2000+
Australian
Suppliers



10+
International
Suppliers

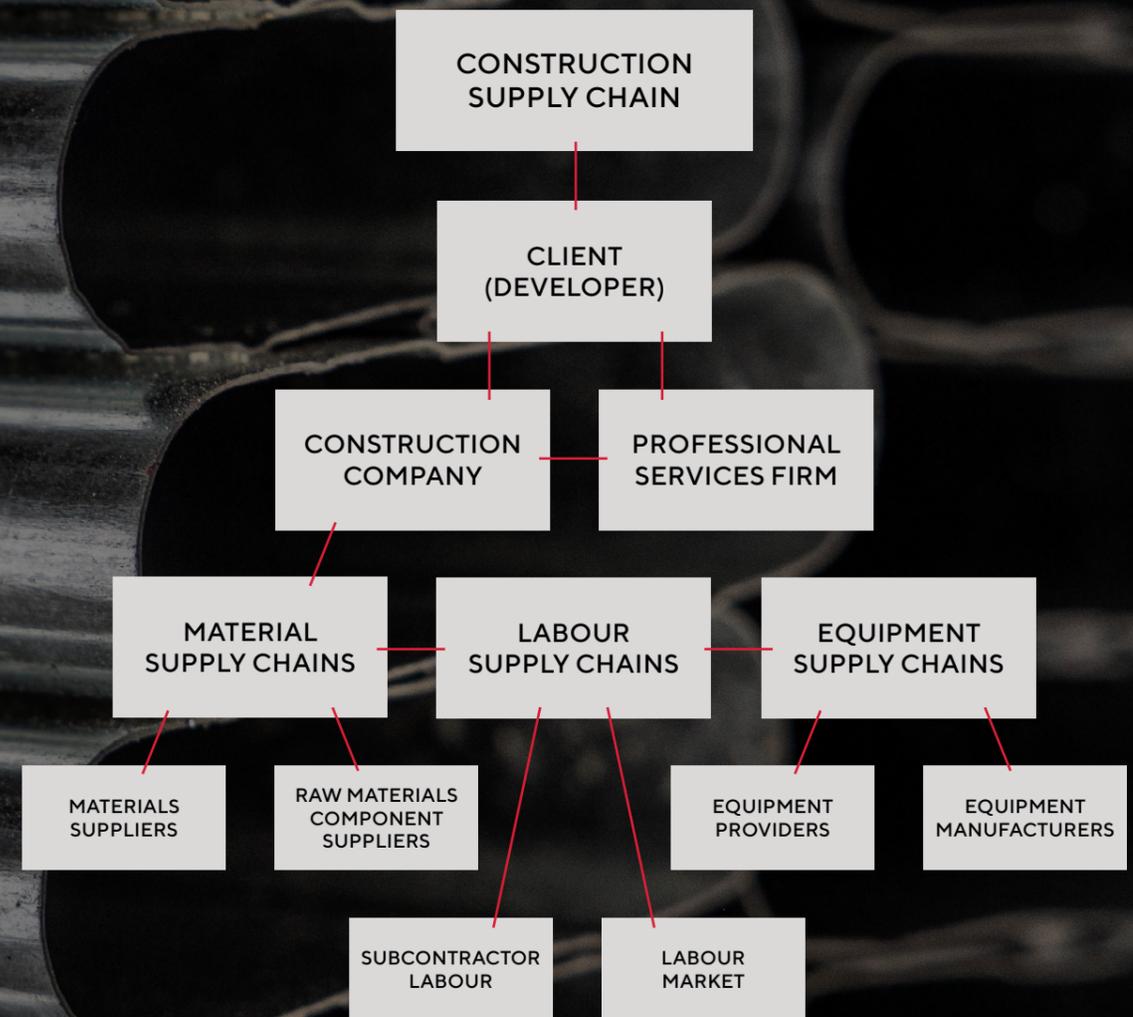
OUR SUPPLY CHAIN

The majority of the works that we undertake are reliant on a strong supplier and subcontractor base (Suppliers). Many of our Suppliers have worked with us for many years and some dating back almost 3 decades. Our excellent reputation and the continuance of that reputation is very much reliant on them. We work with them in a cooperative and collaborative style relationship.

Our subcontractors are assessed by a wide range of criteria including financials, industrial codes, insurance, safety, EMS and Modern Slavery.

Our Supply chain covers 6 key areas:

- Supply Chain Strategy and Planning
- Purchase, Procurement and Fulfillment
- Inventory Management
- Delivery and Customer Service
- Measurement and Evaluation
- Monitoring and Maintenance



OUR SUPPLY CHAIN

Construction Site - Project Team

Materials and Labour

- Hoarding
- Scaffolding
- Access flooring
- Floor & Walls inc. Carpet and flooring
- Ceilings and partitions
- Doors and frames
- Inter-tenancy stairs
- Concrete - supply and place
- Facade such as Glass, Aluminum, Terracotta, Fibre C, GRC and Aluminum Cladding
- Form-work
- L2 transfer wall prefab cage
- Podium facade
- Post tensioning
- Tiles and Stone
- Structural Steel
- Joinery
- Bathroom Pods
- Carpentry

Materials

- Steel
- Concrete
- Reinforcement Supply
- Timber

Roofing

- Steel
- Tiles

Subcontractors and Labour

- Construction survey
- Traffic control
- Masonry works
- Painting
- Turntable
- Electrical security comms services
- Fire protection services
- Hydraulic services
- Lift services
- Mechanical and
- BMS services Demolition / Earthworks
- Reinforcement fix
- Brick + Masonry Works
- Landscape Works
- Consultant Services - Architects/ Design

Equipment

- Hoarding and jump-form signage
- Loading Platforms
- People and materials hoists
- Rubbish Bins
- Site Sheds
- Tower Cranes
- Prefabricated Modular buildings

Head Office

Departments

- WHSEQ + Systems
- Human Resources
- Marketing
- Finance
- Business Development
- Contract Administrators
- Estimating + Business Development
- Administration

Services

- Cleaning + Janitorial Services
- Security Services
- OH+S Uniforms
- IT equipment, Services + Software
- Insurance
- Loose Tools
- Mail + Cargo Transport
- Entertainment
- Passenger Transport
- Motor Vehicles
- Consultants
- Building Repairs + Maintenance

PROCUREMENT PROCESSES

In order for a Supplier to be engaged on one of our projects they must submit a completed "Subcontractor/Supplier Questionnaire". This questionnaire is assessed and vetted by our procurement teams to ensure that the Supplier has the relevant processes in place to ensure that they are able to comply with our processes. As part of this assessment and vetting process our Suppliers are required to set out their policies and approach to managing modern slavery.

Our Suppliers are expected to have their own Code of Conduct in line with Infinity's Code of Conduct.

In addition, all prospective Suppliers attend a "Tender Interview Questionnaire" meeting where they are asked to confirm their commitment to their modern slavery policy. For those Suppliers who engage sub-suppliers, including those that are based internationally, we request compliance statements with the Modern Slavery Act.

As a minimum they must confirm strict compliance with all local and national employment laws and regulations including the payment of the minimum wage and comply with all relevant bribery, corruption and secret commissions laws. In addition, they must confirm strict compliance with occupational Health and Safety and Environmental laws.

The performance of our Suppliers is assessed at the completion of their works and entered into a data base for subsequent procurement teams to review.

We are committed to the highest ethical behaviour attainable and will continue to train and communicate with our employees, suppliers and the greater supply chain to reduce wherever possible any incident of modern slavery.



RISKS IN OUR OPERATIONS

The risk of modern slavery practices within our business were assessed on their potential to cause, contribute to or be directly linked to modern slavery through our operations and supply chains.

The risk of modern slavery in our operations was assessed as low - medium for the reasons set out below.

IDENTIFIED RISKS	RISKS	RISK LEVEL
Casual or Contract workers engaged directly by Infinity	Infinity's workforce is majority permanent, with <10% casual contractors.	Medium
Casual workers under the age of 18 years old.	Infinity has no casual employees under the age of 18 years old.	Low
Migrant Workers	Infinity has <1% employees on a temporary visa.	Low
Seasonal workforce fluctuation	Infinity's operations are not seasonal, with consistent workforce turnover during the reporting period.	Low
External Auditing	Infinity is audited to quality, environmental and safety management standards ISO9001, ISO14001 and AS45001 but is not currently audited by a third party for responsible sourcing. Also, we are accredited and audited by Office of Federal Safety Commissioner (FSC).	Low
Sector Risk	Infinity operates in high-risk sectors including: Construction	Medium
Service engaged by Infinity	Infinity relies on services including recruitment, legal, cleaning services, construction, property maintenance waste disposal and equipment maintenance. Recruitment, construction and cleaning services are considered particularly high risk. Infinity generally has long term relationships with small family businesses or recognised service providers with strong human rights.	Low

IDENTIFIED RISKS	RISKS	RISK LEVEL
Staff	<ul style="list-style-type: none"> Our executive leadership team meets regularly to discuss business risk, which ensures that they have visibility of the risks of modern slavery in our operations and the controls adopted to manage those risks We have strong human resources controls in place for on-boarding new employees, reviewing employees' wages and salary agreements, and verifying corresponding payments. These form part of our Integrated Management Systems that control the processes within our businesses. Our employee induction processes also ensure that new employees confirm they have read and understood our policies and minimum standards. Our employee on-boarding processes include working rights employment checks managed by our Human Resources group. Internal pay parity reviews are undertaken bi-annually against industry benchmarks. Our staff are all located in Australia. 	Low

RISKS IN OUR SUPPLY CHAIN

Materials and construction services, including labour hire are the main areas of higher risk in our business. Modern slavery can be linked to a number of factors pertinent to the construction sector as listed below:

- Prevalence of outsourcing, which can impact upon operational and supply chain transparency
- Contract terms with low margins and significant pressure on delivery times
- Reliance on a migrant workforce with limited local language competency and temporary visa arrangements
- Jurisdictional risk and industry risk in the supply of some construction materials
- Multiple sub-contracting arrangements with informal agreements
- Low barriers for entry for labour hire providers
- Dangerous or substandard working conditions, including:
 - Workers are not paid fairly or withheld entitlements
 - Workers may be required to work excessive hours
 - Workplace safety concerns

Our suppliers predominantly provide labour and materials, as well as services. The materials used in the construction sector are often grown or manufactured in countries

where modern slavery is a greater risk, which also creates risk in the latter tiers of our supply chain. The transport of these materials to Australia also creates modern slavery risk (noting that transport and logistics are inherently high risk for modern slavery).

The selection of construction materials is often made by either the customer (where a particular material is specified, which can only be sourced from one supplier) or the subcontractor supplying labour and materials. It is difficult for a construction company such as ours to have visibility across the multiple tiers in the supply chain of the numerous components and raw materials that are used on our construction sites.

We understand that each of our suppliers may have modern slavery risk in their own supply chains and this could mean that we are put at risk of being directly linked to modern slavery through the business practices of companies in the latter tiers of our supply chain.



The background features large, light gray numbers '04' that are partially obscured by the text. The '0' is on the left and the '4' is on the right, both rendered in a clean, sans-serif font.

**ACTIONS WE HAVE
TAKEN TO ADDRESS
MODERN SLAVERY**



The risk of modern slavery practices within our business are assessed on their potential to cause, contribute to or be directly linked to modern slavery through our operations and supply chains.

SUMMARY GOVERNANCE

WHISTLE BLOWER POLICY

Infinity recognises the value in developing and fostering a culture of corporate compliance, ethical decision making and protecting eligible whistleblowers to make protected disclosures without suffering detriment.

The purpose of our Whistle Blower policy is to prevent and protect disclosed matters, outline the process by which Infinity recognises the value in developing and fostering a culture of corporate compliance, ethical decision making and protecting eligible whistleblowers to make protected disclosures without suffering detriment.

CODE OF CONDUCT POLICY

At Infinity we promote freedom of expression and open communication, however all employees, and our subcontractors, are expected to follow our Code of Conduct. Our Code of Conduct contains the details on the standard of ethics, conduct and behaviour that we are expected to operate under including the observation of basic human rights and the applicable labour laws.

A mandatory online Code of Conduct training module, through our Human Resources Information System, is undertaken by all our employees within the first week of employment. Our Intranet portal contains a copy of the Modern Slavery Act 2018 for all employees to refer to. In addition, we encourage all of employees to raise any breaches of the Code of Conduct via our Whistle Blower policy.

TENDER INTERVIEW / EVALUATION

Supplier Questionnaire:

Infinity's on-boarding of potential suppliers are now required to respond to specific questions in modern slavery compliance as part of Infinity's sub-contractors tender.

Evaluation Report:

- This includes acknowledgment & agreeing to Modern Slavery precautions in Infinity's contract documentation.
- Warranting they will not utilise modern slavery directly or within their supply chain
- Acknowledging they are not aware of any modern slavery risks in their operations or supply chain.
- Agreeing to notify Infinity if they become aware of any Modern Slavery in their operations or supply chains
- Agreeing to participate in Modern Slavery Audit.



**ASSESSING
EFFECTIVENESS OF
OUR ACTIONS
& PATH FORWARD**

MEASUREMENT & EVALUATION ACTION PLAN

MILESTONE	PERFORMANCE INDICATORS	COMPLETION	TARGET FY22
Policies and Procedures	Modern Slavery Statement	Published FY20	
	Whistle Blower Policy	Published FY21	
	Code of Conduct Policy	Published FY21	
	Modern Slavery Policy		To be completed
	Supplier Code of Conduct		To be completed
Due Diligence	Post Tender Interview Questions	Published FY21	Ongoing
	Modern Slavery Questionnaire issued to selected suppliers/ subcontractors	Published FY21	Ongoing
	Modern Slavery clauses in contracts	Completed FY20	
	Right to work checks as part of PTIs (Pre Tender Interviews)		Ongoing
	Modern Slavery Strategy and Review meetings		To be completed
	Bi-Monthly Business Report		To be completed

MILESTONE	PERFORMANCE INDICATORS	COMPLETION	TARGET FY22
Training and Education	Internal staff educational training sessions		Ongoing
	Whistle Blower + Modern Slavery + Code of Conduct Policies distribution via Intranet (Online module)	Published FY20	Ongoing
	Site / Office Posters		To be completed



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30 YEARS OF CONSTRUCTION EXCELLENCE