



GEORGIOU GROUP MODERN SLAVERY STATEMENT 2020

This is Georgiou Group Pty Ltd.'s (Georgiou) statement pursuant to the *Modern Slavery Act 2018* (Cth) following Georgiou's review of its supply chains and operations in compliance with reporting obligations under the Act for the financial year ending **30 June 2020**.

REPORTING ENTITY, STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Georgiou is 100% Australian owned (no foreign ownership) and was established in 1977 and is today one of Australia's leading construction companies. With more than 40 years' experience in providing a diverse range of engineering services to government and private clients, Georgiou is located and delivers projects in Western Australia, New South Wales and Queensland.

Georgiou is a parent company to Georgiou Building Pty Ltd, Georgiou Engineering Pty Ltd and West Cape Pty Ltd and their registered address is 68 Hasler Road, Osborne Park, Western Australia.

As at 30 June 2020, Georgiou had approximately 592 employees, 2285 companies in its supplier network and approximately 494 subcontractors engaged on a required basis to deliver construction requirements.

The diversity of products and services provided to Georgiou by subcontractors and suppliers can potentially expose Georgiou to modern slavery risks in the supply chain, particularly at levels further down the supply chain. However, all contracts are with clients who are based in Australia.

Georgiou is a reputable company with strong cultural values demonstrated in its clearly established systems and processes in locating, identifying, assessing and managing subcontractors and suppliers. Georgiou has procurement processes and plans detailing the expectations prior to a subcontractor or supplier appointment and/or awarded any subcontract.

PROCUREMENT PROCESSES AND ASSESSING AND ADDRESSING MODERN SLAVERY RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

Georgiou has an established procurement procedure for external services, materials and plant. All subcontractors and suppliers are subject to the staged pre-qualification, evaluation and assessment prior to any approval, engagement and contract execution.

The following particular components of Georgiou's procurement process demonstrate steps currently taken by Georgiou to address and eliminate modern slavery in its business and supply chain:

1. Identification of any hazards which may be introduced with the purchase of goods and services and labour hire arrangements and conducting a risk assessment to identify controls to be implemented to eliminate or reduce the risk to as low as reasonably practicable.
2. Georgiou's subcontracts for Major and Minor Supplies and Services require the supplier to warrant that it has not engaged in any collusive or anti-competitive behaviour in connection with the tender or the agreement for the supply. Additionally it contains a modern slavery clause whereby the supplier warrants to comply with applicable modern slavery laws, take all reasonable and necessary steps to identify, investigate and eliminate modern slavery in its operations and supply chains, and provide all information reasonably necessary as requested by Georgiou regarding the supplier's operations and supply chains to enable Georgiou to comply with its obligations under Modern Slavery Laws.
3. Following engagement of suppliers and subcontractors, Georgiou allocates a project representative to mobilise and closely monitor, track and administer the contract.

4. Georgiou's subcontractors and supplier management procedure sets out the process for Georgiou's management of subcontractors and suppliers to ensure that outsourced processes are adequately controlled and externally provided processes, products and services conform to requirements including that all subcontractors and suppliers are required to work in accordance with legal, client and Georgiou requirements including Georgiou policies and procedures.
5. The Georgiou vendor pre-contact assessment for evaluation of pre-qualified subcontractors and suppliers is an extensive checklist required to be completed by the subcontractors and suppliers and includes information on sustainability and initiatives on social and ethical responsibilities and diversity programs.

Georgiou subcontractor and supplier selection process requires adherence to Georgiou's values, policies and procedures. Georgiou will only work with subcontractors and suppliers who commit to operating to the same standards as them. To reinforce this, Georgiou has introduced mandatory modern slavery clauses into all supply chain contracts.

The products and services supplied by Georgiou's subcontractors and suppliers have been primarily sourced in Australia.

Georgiou plan to undertake the following measure to progressively address any potential for exposure of modern slavery in its business and supply chain.

Develop a supply chain map to show the geographic location and nature of sourced products and services for the top 20 suppliers (by value spent) to assist Georgiou to further identify any potential exposure in their extended supply chain network into second and third tier suppliers.

POLICIES AND GOVERNANCE

Georgiou has a Board of Directors and Leadership Team, which include a Chief Risk Officer, and Shared Services Executive General Manager (which encompasses Human Resources and policy and procedure development and review) who report to the Chief Executive Officer. Georgiou has a suite of Group policies relevant to modern slavery including a Sustainability Policy, Code of Conduct and Whistleblower Procedure.

In addition, Georgiou engaged an external party to undertake an audit of Georgiou's existing processes and systems to advise on Georgiou's modern slavery approach and compliance.

CULTURE - THE GEORGIOU WAY

Georgiou has the vision to be '*the best people to work with*'. The Georgiou Way values define how business is conducted internally and externally and sets the foundation on which the business operates and succeeds. These values include safety and creating an environment where people speak up on safety concerns. Georgiou also values relationships which includes leading by example and never damaging the brand. This culture is demonstrated in the implementation of policies and procedures such as the Sustainability Policy, Code of Conduct and Whistleblower Procedure, which are applicable to businesses within their supply chain and are publicly available for download from our corporate website at <https://www.georgiou.com.au/responsibility/policies/>.

SUSTAINABILITY POLICY

Georgiou is committed to a culture of sustainability and manages its operations to minimise environmental and social impacts while integrating sustainability principles and practices into the business, the management of its projects and the materials they procure. Sustainable objectives and targets are established for its projects and Georgiou facilitates the sharing of ideas, knowledge and innovation. Georgiou implements risk and hazard management principles to maintain the health and safety of people and minimise any disruption on its projects, the community and environment.

CODE OF CONDUCT

Georgiou's Code of Conduct sets out conduct expectations and applies to Georgiou's employees, subcontractors, partners and consultants. It is regularly reviewed and updated, including most recently in November 2019 to include the whistleblower procedure. Under this Code of Conduct, all subcontractors and suppliers are expected to act consistently with fundamental Georgiou values, ethical behaviour, respect for others and accountability and transparency in their business conduct.

This code provides protections against conflicts of interests and bribes in Georgiou's business and supply chain. Subcontractors and suppliers are required to avoid conflicts of interest.

Any gifts of hospitality to or from state or Federal Government representatives must be entered into the Georgiou Gift Register, regardless of value. Any gift or hospitality received from or given to (other than government representative) of a value of \$250 or greater must also be entered into the Gift Register. In all cases, there must be no expectation of favours or repayment. Acceptance of cash or any other incentive, inducement or reward in any form is not permitted.

WHISTLEBLOWER PROCEDURE

Georgiou has a whistleblower procedure which includes a confidential and anonymous reporting process that is available and accessible on its intranet and corporate website and applies in respect of its business and supply chain.

Georgiou is committed to ethical practices across all areas of its business and encourages reporting to an independent provider of any information regarding misconduct, the existence of an improper state of affairs, illegal activities, unethical behaviour, breaches of legislation, behaviour which is oppressive, discriminatory or grossly negligent, unsafe work practices, serious risks to public health, safety or the environment or any conduct which poses a serious risk to health and safety of any person at the workplace.

MEASURE OF EFFECTIVENESS OF ACTIONS

Georgiou's actions of an extensive procurement process and contractual terms requiring subcontractors and suppliers to comply with legislative obligations including those relevant to eliminating modern slavery and Georgiou's practices, policies and procedures appears to have been effective in minimising any risk of modern slavery within at least their first tier supply chain (a supplier or subcontractor which Georgiou has a direct contractual relationship with).

MOVING FORWARD

Georgiou has implemented processes and practices within its business including its extensive staged procurement process and contractual terms to minimise any potential risk of modern slavery within their own and their first tier suppliers and subcontractors.

Future plans to enhance the measures Georgiou has already undertaken, as set out above in this statement, supports commitment to effectively identify and address any potential risk exposure of modern slavery in the business and supply chain as part of the ongoing modern slavery roadmap.

This statement was approved by the Georgiou Group Pty Ltd Board of Directors.



Robert Monaci
Chief Executive Officer
For Georgiou Group Pty Ltd

1 July 2020
