

---

# Modern Slavery Statement

2020/21

Version 2.0



---

# Contents

---

1.0

## About us

- Our structure
- Our operations
- Our values
- Our projects
- The impact of COVID-19
- Our supply chain

---

2.0

## The risks of modern slavery in our operations and supply chain

- In our operations
- In our supply chain

---

3.0

## Actions taken to assess and address the risks, including due diligence and remediation processes

---

4.0

## How we assess the effectiveness of our actions

---

5.0

## Process of Consultation

---

6.0

## Approval and Statement annexure

---

---

There are over 40.3 million men, women and children from every part of the globe that are victims of modern slavery.<sup>1</sup> An estimated 18% of modern slavery victims are found in the construction industry. Significantly, at least 22% of forced labour victims are found in the manufacture and production of raw materials including in forestry, mining and quarrying – key suppliers for property and construction.<sup>2</sup>

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

---

<sup>1</sup> Alliance 8.7 2017 Global Estimates

<sup>2</sup> Australian Human Rights Commission, "Property, construction & modern slavery" 2020

# 01 |

## About us

This Modern Slavery Statement is made by Roberts Co Pty Ltd ABN 83 616 561 678 (“Roberts Co”) for the year ended 30 June 2021 (FY21) pursuant to the *Modern Slavery Act* 2018 (Cth) (Modern Slavery Act).

Roberts Co is a privately held company committed to driving positive change in the Australian construction industry. It operates in New South Wales via its wholly owned

subsidiary, Roberts Co (NSW) Pty Ltd, which is also a Reporting Entity. This statement is submitted on behalf of both these entities and when we refer to “Roberts Co”, “we” “us” or “our” in this statement, it is a reference to both these entities. We do not own or control any other entity, and therefore, reporting criteria 6 in relation to the process of consultation with owned or controlled entities is not applicable.

## Our operations

During FY21, Roberts Co employed 140 personnel across head office and five active projects. A breakdown of our personnel by employment type is set out below:

<b>Staff Total</b>	<b>96</b>
<b>Full time</b>	<b>90</b>
<b>Part time</b>	<b>6</b>
Construction Worker	32
Trainees & Apprentices	8
Contractors	2
Female (target of 40% for FY22)	37.6%

Roberts Co delivered work for both private and government clients within NSW, inclusive of commercial education and health.

## Our structure

Roberts Co is a Australian based, and owned, tier-one construction company delivering design and construction services within the state of NSW.

**We have four teams in our operations, namely:**



**Origination**



**Design**



**Project  
delivery**



**Finance, HR,  
legal, IT and  
insurance**

Our registered office and principal place of business is:

Level 9, 60 Castlereagh St,  
Sydney NSW 2000.

# Our values

We recognise the inherent dignity of all people and the importance of respecting and promoting human rights, including the rights of our employees, suppliers and the communities in areas where we operate.

We also expect our suppliers and contractors to respect and promote human rights and encourage any joint ventures to adopt a similar approach.

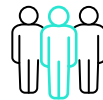
Our approach to assessing and addressing modern slavery, as well as broader human rights, is guided by the United Nations Guiding Principles on Business and Human Rights. In keeping with our hallmark ambitions underpinned by “how we interact with and care for our people, industry partners and the community” and our desire to “drive change in the Australian construction sector”, Roberts Co is committed to adopting industry best practices and standards as part of the global efforts to eradicate modern slavery.

Our values are an expression of what is important to us. Consideration of human rights and modern slavery is integral to our broader commitment to diversity, inclusion, wellbeing and aligns strongly with our organisational values as shown opposite:

---

**We exist to do good,  
not just make good.  
To look forward.  
To innovate. To push.  
To lead. To change.**

---



---

## Empowered People

Strong leadership is in place at Roberts Co, but our flat structure gives everyone a voice. We believe in empowering our team to be the best they can be - exceptional ideas are encouraged and supported no matter who they come from.



---

## Working Smarter

We're concerned with getting things done right and making a difference. We seek teams of diverse thinkers and pivot as needed to increase value and efficiency. We embrace technology and use it to improve our projects, our productivity and our work/life balance.



---

## Relationship Driven

We build relationships as well as projects, fostering true partnerships that stand the test of time. We respect the expertise of our colleagues, clients, subcontractors and consultants because we know it takes a team to build a project.



---

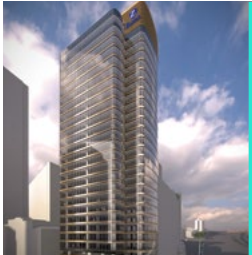
## Creating Value

We are results oriented and have pride in our work. We'll always offer design smarts to enhance our clients' results.

---

# Our projects

During the 2021 financial year, we worked on 6 key projects. Those projects were:



01

## Zurich Tower

20,000m<sup>2</sup> A-Grade office building with 29 floors for commercial tenancies and 3 basement floors. The office tower is the new Australian headquarters for Zurich Insurance.



04

## Liverpool Health and Academic Precinct (LHAP) Stage 1A - Infrastructure Works

The Infrastructure Works project is the first stage of a two stage early works package forming part of the greater LHAP project.



02

## North Shore Health Hub

Two commercial tower buildings, Tower A and Tower B, sitting on top a 5-storey basement and 2-levels of podium. Tower A is a 4-level Health building and Tower B is a 6-level Commercial health building.



05

## Schools at Meadowbank Education and Employment Precinct (SMEEP)

A multi-level, multi-purpose, integrated school building with a primary school wing and high school wing for over 2500 students.



03

## Concord Hospital Redevelopment Stage 1

the construction of a new 44,000m<sup>2</sup> GFA Clinical Services Building. The new building re-houses and expands Aged Complex Care and Rehabilitation services, Veteran's Physical and Mental Health Treatment and Rehabilitation services. The project also includes an integrated Cancer Care Centre, as well as Inpatient services in new purpose-built facilities.



06

## Macquarie Exchange Precinct Project (MQX4)

MQX4 is the first of four new commercial office buildings that will form the centre of Macquarie Exchange – Australia's first community business district.



## The impact of COVID-19

**We have been very conscious of the potential impact of COVID-19 on our business, supply chains and our community this year. We have managed our operations carefully to ensure that all of the people working with us are safe. This includes appropriate protective equipment as well as following guidelines in relation to managing working conditions.**

As the impacts of the pandemic continues to be felt across the world, we have continued to assess and monitor our supply chains, being conscious of the increased number of vulnerable workers who may be at risk of being exploited. As construction and investment in infrastructure

picks up pace, the vulnerability of these worker groups may be exacerbated, as people choose work, irrespective of conditions.<sup>3</sup>

As part of our awareness of the need to assist our subcontractors during periods of shutdown, we continued payment throughout those periods, and where we were asked for early payments we obliged. We are conscious of the impact that unexpected periods of non-payment can have on smaller subcontractors and their employees.

We will continue to engage with our suppliers to manage this risk as the situation evolves.

<sup>3</sup> Australian Human Rights Commission, "Property, construction & modern slavery" 2020



# Our supply chain

In the 2020/2021 financial year, Roberts Co’s procurement spend was approximately \$319m which was an increase of \$129m from the previous financial year, arising from the overall growth of the company. The main categories of spend from our project teams and finance, HR, legal, IT and insurance team are shown below:



## Project teams

Items denoted with \* are manufactured overseas

### 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

### Materials

- Steel\*
- Concrete
- Reinforcement supply

### Materials and labour

- Hoarding
- Scaffolding
- Access flooring
- Carpet and flooring
- Ceilings and partitions
- Doors and frames
- Inter-tenancy stairs
- Concrete – supply and place
- Façade such as glass, aluminium, terracotta, Fibre C, GRC and aluminium cladding
- Formwork
- L2 transfer wall prefab cage
- Podium façade
- Post tensioning
- Tiles\*
- Stone\*

### Equipment

- Hoarding and jumpform signage
- Loading platforms
- People and materials hoists
- Rubbish bins
- Site sheds
- Tower crane



## Finance, HR, legal, IT and insurance

- IT software
- IT equipment
- Merchandise
- Corporate travel and hospitality
- Insurance broker and insurance services
- Advisory services, including professional services
- Training
- Office supplies
- Office cleaning

Of the above, our top spend categories were: subcontractors, labour and materials.

Our major sourcing regions were:

- Australia
- China
- South East Asia
- Europe

Most of our direct suppliers are domiciled in Australia, although they often supply goods or services sourced from other jurisdictions. Our subcontractors mostly supply the construction materials to be used on our projects, so this limits our visibility of the risks associated with these parts of our supply chain. Transport and logistics are also primarily acquired by our suppliers, subcontractors or their suppliers.

---

# 02 |

## The risks of modern slavery in our operations and supply chain

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, as grounded in the human rights due diligence framework outlined in the United Nations Guiding Principles on Business and Human Rights.

---

### In our operations

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

- ✔ Our executive leadership team meets regularly to discuss business risk, which ensures that they have visibility of the risk of modern slavery in our operations and the controls adopted to manage those risks.

---

  - ✔ We have strong human resources controls in place for onboarding 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.

---

  - ✔ Approximately 25% of employees are covered by enterprise or industrial agreements.

---

  - ✔ Our employee on-boarding processes include working rights employment checks managed by our Human Resources group.

---

  - ✔ Our employee induction processes also ensure that new employees confirm they have read and understood our policies and minimum standards.

---

  - ✔ Internal pay parity reviews are undertaken bi-annually against industry benchmarks.

---

  - ✔ Our staff are all located in Australia.
-



# 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



Debt bondage is one of the slavery-like practices that can occur in the construction sector where bonded labourers have to work to pay off debts that are often greater than the wages earned, resulting in an inability to leave. Although we are conscious of this risk, during the reporting period, we did not identify any red flags for debt bondage at our sites.

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.

In order to better understand our risks, our supply chain risk assessment in 2020 involved a deeper dive into one of our construction projects to examine where further due diligence may be required. We consider this analysis to still be current. This process identified high and moderate risk categories as follows, which we have reviewed and continue to view as accurate:

**In terms of the risks in the supply chain supporting our finance, HR, legal, IT and insurance, there are medium risks of modern slavery in merchandise, office supplies and IT and telecommunications equipment.**

	<p><b>High risk</b></p>	<p>Ceilings and partitions Podium façade</p>
	<p><b>Medium risk</b></p>	<p>Site sheds Scaffolding Traffic control Demolition &amp; earthworks</p> <p>Formwork Reinforcement fix Façade</p>

---

# 03 |

## **Actions taken to assess and address the risks, including due diligence and remediation processes**

We recognise our responsibility under the UNGPs to provide or participate in the remediation of any identified human rights impacts that we cause or contribute towards. During the course of the Reporting Period, we have not identified any reports that could be linked to modern slavery. If we found that our business had caused or contributed to modern slavery, we would take guidance from the UNGPs, which provides that businesses in this situation need to remediate the impact by taking a person centred approach protecting the safety, privacy and wellbeing of the affected person. We would investigate the situation to ensure that an appropriate corrective action plan is implemented and assess how similar impacts could be avoided in the future.

Our work during FY21 built upon the actions described in our first statement. Our existing policies and procedures are described in Annexure A. We completed the majority of the goals that we set for ourselves in our FY20 modern slavery statement to ensure that our approach to assessing and addressing modern slavery risks is effective.

---

**Building a better way**

---

### In summary, the actions we have taken are set out below:

- Revised the IMS manual, procurement guidelines and forms used for the procurement of subcontractors to include modern slavery considerations
- Revised procurement processes to include modern slavery due diligence on suppliers prior to engagement. This included engaging subcontractor and suppliers that advised that they have in place adequate procedures to manage modern slavery risk;
- Rolled out the Modern Slavery Policy through a training programme and internal communications were issued by the CEO and displayed on site noticeboards. This training was facilitated by an external human rights expert.
- Developed a poster to be placed at various locations on our project sites raising awareness of modern slavery and our whistleblowing processes
- Partnered with Dexus on an approach to prevent modern slavery on construction sites - during the year, Dexus and Roberts Co held workshops to share knowledge on each organisation's approach to combatting modern slavery.
- Included modern slavery risk in our risk register and processes and reviewed the risks of modern slavery every six months at our Management Review Meetings.

---

**Our work to manage our modern slavery risk is ongoing**

---



---

# 04 |

## How we assess the effectiveness of our actions

In our first modern slavery statement, we stated that we would seek to assess the effectiveness of our program by actioning a number of goals which we have largely completed, as outlined above.

We remain committed to continuous improvement of our processes to prevent and address modern slavery risks in our operations and supply chain. Our work in this area is overseen by the CEO and the Board. As part of our ongoing efforts, we have expanded our metrics for assessing the effectiveness of our actions to include the following goals for FY22:



Continue to monitor whistleblower reports for trends relevant to modern slavery



Initiate a project reviewing the currency of our risk assessment from 2020



Review of the number of suppliers who have adopted commitments to manage modern slavery risk



Continue the industry collaboration (including with Dexus) to identify modern slavery risks in the procurement supply chain during the architectural design process and share information with development sub-contractors who are responsible for the procurement of materials.

---



---

05 |

# Process of consultation

---

**Both of the reporting entities share directors and an executive team**

---

By its nature, the assessment and management of modern slavery risk requires the involvement of representatives of the commercial, procurement, finance legal and IT (including human resources) teams, as well as the oversight of management. The individuals involved in the preparation of this statement were consulted in relation to both of the Reporting Entities. These entities do not otherwise have owned or controlled entities that require consultation to prepare this statement. This statement reflects the work undertaken during the year of representatives of all of these teams within Roberts Co.



---

06 |

# Approval

This statement for the financial year ending 30 June 2021 is made pursuant to section 14 of the *Modern Slavery Act 2018 (Cth)* and has been approved by the Board of Roberts Co, the members of which also constitute the board of its subsidiary, Roberts Co (NSW) Pty Ltd, on 17/12/2021 at Level 9, 60 Castlereagh St, Sydney. This statement is signed by a responsible member of the Board of Roberts Co, the higher entity, as defined by the Act.

Signed,



**Alison Mirams**  
**CEO**  
17/12/2021













# Statement Annexure

Mandatory criteria	Page number/s
Identify the reporting entity	2
Describe the reporting entity's structure, operations and supply chains.	2, 3, 4, 5
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	6, 7
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	8, 9
Describe how the reporting entity assesses the effectiveness of these actions.	10
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	11

## Annexure A

-  Health and Safety Policy
-  Environmental Policy
-  Quality Policy
-  Drug and Alcohol Policy
-  Return to Work Policy
-  Industrial Relation Policy
-  Modern Slavery Policy
-  Whistleblower Policy

---

# Modern Slavery Statement

2020/21

Version 2.0



Level 9, 60 Castlereagh St  
Sydney NSW 2000

[roberts.co](https://roberts.co)

---