
Modern Slavery Statement

2019/20

Version 1.0



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Modern Slavery is a serious crime. It impacts the rights of approximately 45million people globally. All businesses have risk that they are linked to modern slavery, whether as a result of their operations or their supply chains, or both. In the construction industry globally and within Australia, there have been serious reports of modern slavery risk.

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

01 | About us

This inaugural Modern Slavery Statement is made by Roberts Co Pty Ltd ABN 83 616 561 678 ("Roberts Co") for the year ended 30 June 2020 (FY20) pursuant to the *Modern Slavery Act 2018* (Cth) (Modern Slavery Act). During that period Roberts Co was called Roberts Pizzarotti Pty Ltd.

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.

Our registered office and principal place of business is:

Level 54, 1 Farrer Place
Sydney NSW 2000.

Our operations

During FY20, Roberts Co employed 144 personnel across head office and five active projects. Roberts Co delivered work for both private and government clients within NSW, inclusive of commercial, education and health.

Our structure

Roberts Co is a privately owned 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

01 | About us

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 sub-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 right.

**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 2020 financial year, we worked on 5 key projects:



01

Zurich Tower

20,000m² A-Grade office building with 29 floors for commercial tenancies and 3 basement floors. The office tower is the new Australian headquarters for Zurich.



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.



03

Concord Hospital Redevelopment Stage 1

The construction of a new 44,000m² 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.



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.



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.



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. We are continually assessing and monitoring our supply chains and are aware of the risk that vulnerable, often displaced, workers are being exploited. We will continue to manage this risk as the situation evolves.

Our supply chain

In the 2019/2020 financial year, Roberts Co's procurement spend was approximately \$190m. We undertook an assessment of our supply chain with a consultant during the course of the year. This assessment established that the main categories of spend originated from our project teams and finance, HR, legal, IT and insurance team as detailed below:



Project teams

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
- Formwork
- L2 transfer wall prefab cage
- Podium façade
- Post tensioning

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

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.

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 defined in the *Modern Slavery Act 2018 Guidance for Reporting Entities*.

In our operations

In FY20, Roberts Co completed an initial review and gap analysis of the risk of modern slavery 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.
- ✓ Our staff are all located in Australia.
- ✓ Our supply chain subcontracts are all written in simple, easy to understand language and contain the words "we will be fair and reasonable"

02 | Risks

In our supply chain



In undertaking an assessment of modern slavery risks in our project supply chains, we identified that materials and construction services, including labour hire, were the main areas of higher risk in our business. We are mindful that modern slavery is 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
- 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

The majority of our suppliers are domiciled in Australia. They 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 our supply chain. The selection of 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 will have modern slavery risk in their own supply chains.

In order to better understand our risks, our supply chain risk assessment involved a deeper dive into one of our construction projects to examine where further due diligence may be required. This process identified high and moderate risk categories as follows:

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

	High risk	Ceilings and partitions Podium façade								
	Medium risk	<table border="0"> <tr> <td>Site sheds</td> <td>Formwork</td> </tr> <tr> <td>Scaffolding</td> <td>Reinforcement fix</td> </tr> <tr> <td>Traffic control</td> <td>Façade</td> </tr> <tr> <td>Demolition & earthworks</td> <td></td> </tr> </table>	Site sheds	Formwork	Scaffolding	Reinforcement fix	Traffic control	Façade	Demolition & earthworks	
Site sheds	Formwork									
Scaffolding	Reinforcement fix									
Traffic control	Façade									
Demolition & earthworks										

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

We recognise that any actions to assess and address modern slavery risks must be responsive to the gaps and red flags identified via an assessment process. Accordingly, in order to better understand the risks in our operations and supply chain we worked closely with an external consultant to undertake a gap analysis of our business and to formulate recommendations on how we can better integrate human rights considerations into our governance and management processes.

The gap analysis considered the following aspects of our business:

- 01 Commitment
- 02 Governance
- 03 Strategy
- 04 Management
- 05 Enablers
- 06 Due Diligence
- 07 Supply Chain (ISO 20400 Alignment)
- 08 Grievance & Remedy
- 09 Collaboration
- 10 Reporting & Assurance

We are continuing our response to this gap analysis in FY21

03 | Actions

As outlined above in our description of our risk, during FY20, we undertook a risk assessment of our supply chain. A human rights heat map was prepared listing out the categories within our supply chain, suppliers, sourcing regions and allocating a risk rating of high, medium and low.

The rating was based on whether:

- there is evidence to prove the supplier is capable of managing the risks identified (this may include policies on sustainability, health, safety, existing reports, covering by similar regulations overseas)
- Roberts Co has in place controls to manage and mitigate risks with the suppliers and leverage our relationship with the supplier
- Following this initial work assessing our risk, we took the following further steps to address our identified modern slavery risks:
 - » implemented a human rights policy applicable to our operations, all of our employees, contractors and service providers
 - » reviewed our Integrated Management System Manual, Procurement Procedure and Procurement Guideline to identify how we can integrate human rights considerations into our procurement processes
 - » incorporated a control measure in our Risk and Opportunities Register to ensure that our policies and systems addressing human rights and modern slavery risk are aligned with legal requirements
 - » established a process for annual review of human rights and modern slavery risks
 - » adopted a Whistleblower Policy, available to all employees, subcontractors and suppliers, to expressly include human rights concerns
 - » communicated the adoption of the Whistleblower Policy to staff and suppliers, including subcontractors
 - » participated in construction industry collaboration in relation to modern slavery risk, including the Sustainability School and the Property Council of Australia pre-qualification project.

Our work to manage our modern slavery risk is ongoing



04 |

How we assess the effectiveness of our actions

We are still in the process of developing the process by which we will assess the effectiveness of the actions that we have taken to manage the risk that we cause, contribute or are directly linked to modern slavery. Many of the actions that we have taken this year have been part of the development of a framework to manage modern slavery into the future. As our program develops, we will assess whether this framework needs to be supplemented or changed to manage this risk as our understanding of our exposure to modern slavery deepens.

Our assessment of the effectiveness of our actions will include:



Review of Whistleblower reports for trends relevant to modern slavery



Updating our gap analysis to ensure that risks identified are managed



Inclusion of modern slavery risk in our risk register and processes



Review of the number of staff trained in relation to modern slavery risk



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



Our adoption of the recommendations of industry collaborations in which we are involved

05 |

How this statement was prepared

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. This statement reflects the work undertaken during the year of representatives of all of these teams within Roberts Co. This work included internal meetings, meetings with a consultant to analyse risk and potential responses, as well as implementation of the controls adopted by us.



06 |

Other relevant information

During FY21, we will continue to develop our modern slavery management program. Our focus will be on managing the risks of modern slavery that have been identified in FY20. These risks primarily exist in our supply chain, so in FY21, we will focus on actions that manage this risk.

In addition to our actions to manage modern slavery risk, we have adopted a number of strategies to reduce our human rights impact. These include:

- we have championed diversity of gender, race and age. During the reporting period, our business comprised 5% Indigenous staff, 33% Female staff and we have 35% cultural diversity across our workforce with ages ranging from 18 to 63 years of age.
- we partnered with Indigenous Defence & Infrastructure Consortium (iDiC), demonstrating the business' dedication to the sustainable inclusion of Indigenous owned businesses as meaningful participants in our supply chain. iDiC is an indigenous owned business, led by CEO Adam Goodes which brings together a consortium of 90+ Indigenous Supply Nation certified businesses.

This statement for the financial year ending 30 June 2020 is made pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) and has been approved by the Board of Roberts Co.

Signed,



Alison Mirams
CEO
17 March 2021



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Level 54, Governor Phillip Tower
1 Farrer Place, Sydney NSW 2000

roberts.co
