

# MODERN SLAVERY STATEMENT



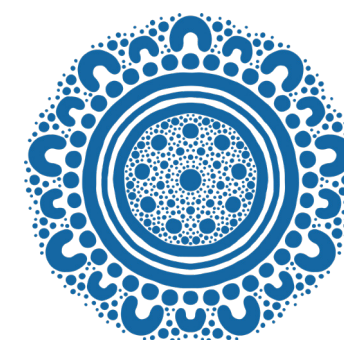


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RCC acknowledges the Traditional Owners of the lands on which we work and live.

We pay respects to Elders past, present and emerging and recognise the continuing connection First Nations people maintain with land and water.



*Artwork produced for RCC by Christine Slabb, Bundjalung woman and graphic designer.*



OUR COMPANY VALUES

We take pride in our work	We do what we say	We value people	We work as a team
We strive to build remarkable places, contribute positively to communities, continually evolve in our capabilities, and nurture relationships both within RCC and beyond.	We take our commitments to work and safety seriously, and we stand by them. When we agree to a timeframe, deliverable, cost, course of action or quality standard, we can be trusted to deliver as promised.	At RCC, no one feels like a number. We take the time to get to know people as individuals to ensure everyone feels heard, and build genuine relationships on a foundation of respect. Every voice matters and every contribution counts.	Our focus is on effective teamwork, and we strive to create an environment where communication is clear, open and positive. Keeping an eye out for each other, we work together safely to achieve great things.

ABOUT THIS STATEMENT

RCC has prepared this Modern Slavery Statement in line with the mandatory reporting criteria set out in the Modern Slavery Act 2018 (Cth). The reporting period covered by this statement is July 1 2023 – June 30 2024 and was approved by the RCC Board of Directors on December 9 2024

MESSAGE FROM OUR MANAGING DIRECTOR

As the Managing Director of Richard Crookes Constructions (RCC) and part of the Crookes family, I am committed to combating modern slavery in our operations and across our supply chain.

RCC is committed to operating with integrity and upholding the highest ethical standards across all business units and our supply chain. We recognise the critical importance of addressing modern slavery and human trafficking, not only as a legal obligation under the Commonwealth Modern Slavery Act 2018 but as a fundamental moral imperative that aligns with our values and social license as an Australian business.

As a leading construction company in Australia, we understand the significant role we play in shaping the built environment and the responsibility we bear in ensuring that our projects are delivered in line with our Environmental Social and Governance (ESG) aspirations.

This statement outlines RCC’s approach to identifying, assessing, and mitigating the risks of modern slavery within our operations and supply chains. It details the steps we have taken and continue to take to ensure we are creating safe and sustainable outcomes for the people involved in the work we do.

Our strategy encompasses:

- 1. Our due diligence processes
- 2. Bespoke risk assessments
- 3. Ongoing supplier engagement and management
- 4. Ongoing training and awareness programs for our staff and partners
- 5. Collaboration with industry peers and stakeholders to address systemic issues.

RCC is committed to transparency and continuous improvement in our efforts to combat modern slavery. This statement serves not only as a compliance document but as a reflection of our values and a roadmap for our ongoing journey towards creating a more equitable and sustainable construction industry.

*Jamie Crookes*

Jamie Crookes, Managing Director  
Richard Crookes Constructions



# OUR PROGRESS IN SUMMARY

To support our commitment, we have implemented the following measures:

01

SUPPLY CHAIN AUDITS

We regularly assess our suppliers and subcontractors to ensure compliance with labour laws and ethical practices.

02

EMPLOYEE TRAINING

Our staff undergo training on identifying and reporting potential instances of modern slavery.

03

COLLABORATION WITH INDUSTRY PARTNERS

We actively participate in industry initiatives aimed at eradicating modern slavery from the construction sector.

04

TRANSPARENCY

We publish an annual Modern Slavery Statement, detailing our efforts and progress in this area.

05

REPORTING MECHANISMS

We have established confidential channels for reporting any suspected cases of modern slavery within our operations or supply chain.



## 1.0 REPORTING ENTITY

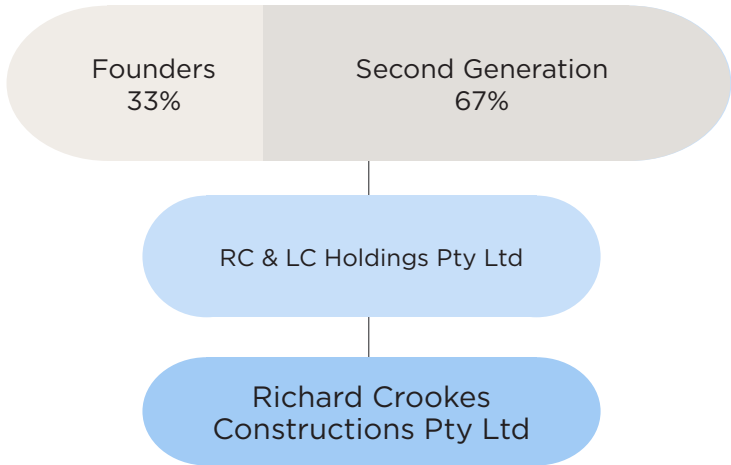
This Modern Slavery Statement is submitted under Section 13 (Single Reporting Entities) of the Modern Slavery Act 2018 (Cth).  
 The reporting entity is Richard Crookes Constructions Pty Limited.  
 The reporting period for the entity is July 1 2023 – June 30 2024.

## 2.0 REPORTING ENTITY’S STRUCTURE, OPERATIONS AND SUPPLY CHAINS

### STRUCTURE

Richard Crookes Constructions (RCC) is an Australian company, privately owned by the Crookes family.  
 RCC has over 800 direct employees working across approximately 40 project sites and offices.

Ownership structure



### OPERATIONS

RCC is a Construction Management business that delivers projects across all sectors for private and government clients ranging from \$10m-\$500m+.  
 RCC’s registered office (and head office) is located at Level 14, 558 Pacific Highway, St Leonards NSW. With our original and head office based in Sydney, we have localised client service with offices in Newcastle, Tamworth, Canberra and Brisbane.  
 Further information can be found at [richardcrookes.com.au](http://richardcrookes.com.au)



MODERN SLAVERY RISK GOVERNANCE

Corporate direction and oversight	Board	Endorses approach to modern slavery
	Senior Leadership team	Approves statement
	Corporate Affairs & ESG team	Consults with Subject Matter Expert's (SME), considers risks and recommends statement for business approval
Operational delivery	ESG Advisory Group	Coauthors approach to ESG issues in the business
	General Manager Collective	Leads operations across each business unit
	Commercial and risk team	Oversees the execution of contracts, agreements and screening in line with modern slavery statement
	Project teams	Inducts supply chain into modern slavery approach and monitors for site-based issues
	People and culture team	Manages and assists in remedying issues raised

SUPPLY CHAIN

RCC's business and procurement model is heavily reliant on the use of subcontractors and suppliers.

RCC had over 1,830 direct subcontractors / suppliers engaged on its construction projects during the FY24 reporting period, with an annual spend of circa \$1.42b.

On any given day, across RCC's 40 active projects, there are approximately 3000 workers on site, 800 RCC direct employees and 380 subcontractor businesses.

RCC engages with Australian based subcontractors and suppliers, many of whom source materials from overseas, namely China, Malaysia and Europe (Italy, Turkey, Spain, France and Germany).

PROJECT SUPPLY CHAIN



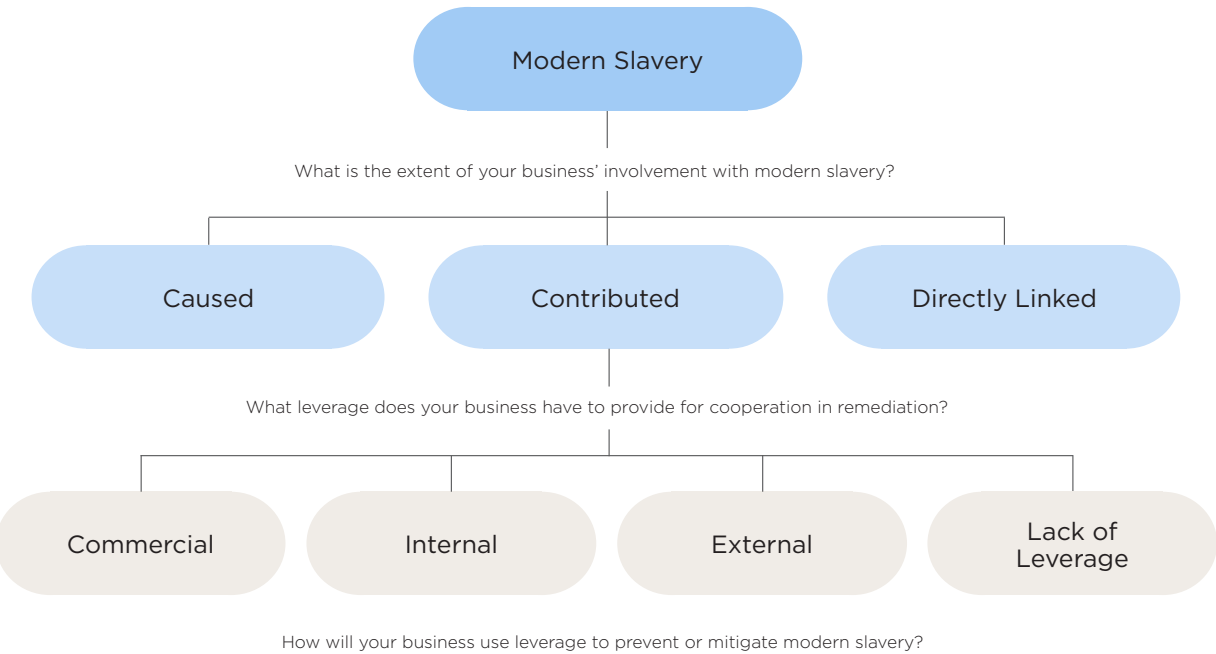
3.0 RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS OF THE REPORTING ENTITY AND ANY ENTITIES IT OWNS OR CONTROLS

RCC has assessed and identified our risks of modern slavery in line with the guidance set out in the Commonwealth Modern Slavery Act – Guidance for Reporting Entities.

Our review has considered four key risk factors:

- 1. Sector and industry risk
- 2. Product and services risk
- 3. Geographic risk, and
- 4. Entity risk

Once identified, we have categorised any risks in line with the approach outlined in The Property Council of Australia’s (PCA) “Remediating Modern Slavery in Property & Construction” and the United Nations Guiding Principles Cause, Contribute and Directly Linked framework.



RCC has considered our contract terms and conditions, subcontractor on boarding and management practices to assess where we sit on the continuum.

THE RISK OF CAUSED MODERN SLAVERY

RCC directly engages labour across New South Wales (NSW), Queensland (QLD) and the Australian Capital Territory (ACT). All employees are engaged in line with our companies’ policies and procedures which are developed in accordance with relevant laws. As a result, the risk of RCC directly causing modern slavery is considered low.

THE RISK OF CONTRIBUTING TO MODERN SLAVERY

RCC acknowledges that there is a potential risk of inadvertently contributing to modern slavery through our business operations and supply chain engagement. This includes actions taken by supply chain as a result of industry or commercial pressures. To mitigate this risk, RCC has a number of formal and informal processes and procedures in place to ensure we are engaging with the supply chain early and often and are able to respond to changes in our subcontractors and suppliers workforce and material selection. This includes our contractor questionnaire, ongoing procurement process, whistleblower policy, site-based training and inductions. As a result, we have deemed this risk as unlikely to occur.

THE RISK OF BEING DIRECTLY LINKED TO MODERN SLAVERY

The depth and diversity of RCC’s supply chain poses the biggest risk to modern slavery and therefore has the majority of the focus.

Certain goods and services have a higher risk of modern slavery. These can include the supply of raw materials, electronic products, solar panel suppliers, the supply of raw materials, suppliers of freight and logistics, cleaning and labour hire.

Our supply chain assessment identified the following as the key modern slavery risks within RCC’s extended supply chain:

- Underpayment, indentured workers and exploitation of migrants in construction, trades or labour hire
- Labour conditions and child labour in the supply chain of building and mechanical products and materials
- Labour conditions and child labour in the supply chain of manufactured goods, such as furniture, hardware and fittings.

SUPPLY CHAIN VISIBILITY

SUPPLY CHAIN	VISIBILITY	RISK PROFILE
Level 1 – Head Contractor	High visibility	Low
Level 2 – Direct subcontractor or supplier	Medium visibility	Medium
Level 3 – Manufacturer	Medium visibility	High
Level 4 – Raw Materials	Low visibility	High



RCC MODERN SLAVERY RISK ASSESSMENT

SECTOR/ INDUSTRY	RISK INDICATOR	RISK DESCRIPTION	CONTINUUM OF INVOLVEMENT
Labour hire	Sector and industry	Labour rights in construction activities including labour hire, cleaning and security.  Common types of modern slavery include: <ul style="list-style-type: none"><li>• Forced labour</li><li>• Debt bondage</li><li>• Deceptive recruiting</li></ul>	Directly linked
Mechanical & Equipment	Geographic	Labour rights and health and safety in overseas supply chains of parts, equipment and components and other manufactured goods including the production of metal products.  Common types of modern slavery include: <ul style="list-style-type: none"><li>• Slavery</li><li>• Forced labour</li><li>• Debt bondage</li><li>• Deceptive recruiting</li></ul>	Directly linked
Electronics	Sector & industry	Labour rights and health and safety in electronics supply chains.  Common types of modern slavery include: <ul style="list-style-type: none"><li>• Slavery</li><li>• Forced labour</li><li>• Servitude</li><li>• Deceptive recruiting</li></ul>	Directly linked

SECTOR/ INDUSTRY	RISK INDICATOR	RISK DESCRIPTION	CONTINUUM OF INVOLVEMENT
Construction Materials	Geographic	Labour rights, health and safety and human rights and governance in the overseas supply chain of building materials such as timber, plastic, glass, cement, metals, paint, textiles, ceramics, brick, sand, clay, stones, gravel, gypsum, brassware and iron.  Common types of modern slavery include: <ul style="list-style-type: none"><li>• Slavery</li><li>• Forced labour</li><li>• Servitude</li><li>• Debt bondage</li><li>• Child labour</li></ul>	Directly linked
Energy	Geographic	The production of raw materials and other inputs for the manufacture of solar panels and batteries has been linked to human rights risks in countries with large populations, low-skilled workers and a history of exploitation.  Common types of modern slavery include: <ul style="list-style-type: none"><li>• Slavery</li><li>• Forced labour</li><li>• Servitude</li><li>• Debt bondage</li><li>• Child labour</li><li>• Deceptive recruiting</li></ul>	Directly Linked



#### 4.0 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

As a family-owned business, we strive to operate with integrity and effectiveness ensuring our status as a responsible corporate entity. We have implemented several measures to evaluate and mitigate the risk of modern slavery within our business and supply chain:

- A policy which articulates RCCs commitment to prevent modern slavery within its operations and supply chains – Anti-slavery Policy.
- Communication of the Anti-slavery Policy to all RCC employees and it's supply chain.
- The assessment of modern slavery and human trafficking risk within RCC and its supply chains and the development of effective, efficient and transparent controls to reduce exposure to those risks.
- The adoption of anti-slavery wording in contracts.
- The adoption of appropriate due diligence on business partners, agents, contractors, consultants, sub-contractors and suppliers, coupled with the requirement that they implement procedures which incorporate the principles under the applicable modern slavery legislation.
- Training of all RCC employees so that compliance with this policy is the duty of all relevant employees at all levels and individuals can recognise modern slavery practices and take steps to avoid or report modern slavery as necessary.

##### ANTI-SLAVERY POLICY

RCC is committed to limiting the risk of modern slavery within its business, in its supply chain or through any other business relationship. The anti-slavery policy applies to all persons working on and on behalf of RCC in any capacity.

##### SUPPLY CHAIN MANAGEMENT

RCC has a supplier code of conduct that applies to all third-party suppliers, employees of suppliers and contractors engaged to provide any goods or services required through the supply chain. All suppliers have to sign and agree to the code of conduct as part of the General Conditions of the subcontract. It sets out our expectations of our suppliers, their subsidiaries and supply chain to enable them to comply with the Code.

##### SCREENING OF ALL NEW SUPPLIERS AND SUBCONTRACTORS

All new suppliers and subcontractors complete the RCC pre-qualification questionnaire. The pre-qualification questionnaire documents RCC's modern slavery requirements and analyses the suppliers understanding, implementation and risk profile for modern slavery management.



## WHISTLEBLOWER POLICY

RCC's whistleblower policy outlines the businesses commitment to openness, integrity and accountability whilst ensuring compliance with current whistleblowing legislation. The policy sets out the circumstances in which a person can make a whistleblowing disclosure, the process RCC will follow when dealing with the disclosure and the protections that will apply to the whistleblower. As a business, RCC encourage the disclosure of information that suggests misconduct, breach of legislation and improper situation.

## FAIRCALL REPORTING HOTLINE

The Faircall hotline is an independent service to report suspected unlawful and unacceptable conduct. The hotline is available to everyone that works with RCC. The details are available on the RCC intranet for RCC direct employees and on posters around site offices for RCC subcontractors and suppliers. Reports to the Faircall hotline can remain anonymous.

## INDUSTRY ENGAGEMENT

RCC engages with specialist consultants and industry peers to ensure we have an aligned approach to addressing modern slavery in the construction industry. This has included PCA workshops and a construction industry consortium to address shared risk in operations.

## WORKFORCE TRAINING

RCC has run Modern Slavery Awareness Training and more detailed workshops with our people. Currently over 560 employees have completed the training. The awareness training outlines our requirements for modern slavery in line with the Modern Slavery Act 2018 (Cth). It provides a definition, scope and indicators of modern slavery globally. It also shows how people can respond individually through responsible purchasing practices and supporting anti-slavery initiatives.

For the FY24 reporting year our focus was updating and embedding existing processes and procedures. During this period, we have also created an ESG team, of which Modern slavery is a core focus area.





## 5.0 ASSESSING THE EFFECTIVENESS OF THESE ACTIONS

RCC regularly monitors the effectiveness of our framework, policies and processes used in relation to modern slavery risks through the following means:

### SUPPLIER INTERVIEWS

Conducting interviews with selected suppliers/subcontractors to review in more detail their response to our modern slavery questionnaire.

### DESKTOP AUDITS OF PROCESS IMPLEMENTATION

Desktop reviews of RCC's construction procurement software ProcurePro to ensure successful completion of Modern Slavery Questionnaire's from new subcontractors and suppliers.

This year we have also made the Faircall reporting hotline more readily available to employees throughout the supply chain by including a QR code and information on modern slavery in inductions and on our intranet.

### GOVERNANCE OVERVIEW

Each year RCC and the relevant committees review key policies and procedures. This year we have made amendments to the whistleblowing and anti-slavery policy to align with each other and the wider strategy.

We have also introduced an ESG Advisory Group that will ensure our approach remains aligned with regulatory, client and community standards.

### CONTINUAL IMPROVEMENT

RCC is continually looking for ways to improve our processes and gain more visibility over the risk associated with our supply chain and operations. Our focus for FY25 is:

- Interviews with trades associated with high risk geographical, industry and sector areas
- Additional modern slavery training
- Materiality assessment to ensure our modern slavery approach meets the needs of industry.

## 6.0 CONSULTATION WITH ANY ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS

As RCC is an Australian construction management business, it is the sole entity for the purpose of this reporting. RCC do not own or control any other entities.

The development of RCCs Modern Slavery Statement required consultation with relevant department heads or SME. The document has been circulated for feedback and approval prior to submission.

Key contributors include:

- Chief Financial Officer – Supplier information and financial advisory
- General Manager, Commercial & Risk – Supply chain engagement
- Head of Corporate Affairs & ESG – Modern Slavery advisory
- Chief People Officer – People processes

The RCC Board of Directors approved this statement on December 9 2024.







7.0 PROVIDE ANY OTHER RELEVANT INFORMATION

Our policies and procedures that support our approach to identifying, remediating and combating modern slavery are tabled below, and can be found in the appendix.

POLICY	PURPOSE	LAST AMENDED
ANTI-SLAVERY POLICY	Outlines RCC’s stance on modern slavery and the legal requirements of everyone working for or on behalf of RCC.	March 2024
SUSTAINABILITY IN PROCUREMENT	Outlines the support and process in place to support supply chain integrity and human rights.	April 2024
WHISTLEBLOWING POLICY	The Whistleblower Policy provides a way for eligible disclosers to raise concerns of malpractice they believe to be occurring at work, or in the context of the Company’s operations.	June 2024
SUPPLIER CODE OF CONDUCT	Set’s out the required behaviours, processes and support all suppliers must have in place to work with RCC.	April 2024
ANTI-HARASSMENT, ANTI-BULLYING AND ANTI-DISCRIMINATION POLICY	This policy describes the legal and commercial requirements to provide all employees with a work environment free from all forms of discrimination, bullying and harassment.	March 2024





## APPENDIX POLICIES

# ANTI-SLAVERY POLICY

### OBJECTIVES

Richard Crookes Constructions (the **Company**) is committed to limiting the risk of modern slavery occurring within its own business, in its supply chains or through any other business relationship.

Modern Slavery can take many forms but fundamentally is a range of exploitive practices including human trafficking, slavery, forced labour and child labour all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

As part of its commitment the Company will comply with all applicable Australian and International slavery legislation including the *Modern Slavery Act 2018 (Cth)* and the *Modern Slavery Act 2018 (NSW)*.

This policy will be used to underpin any statement on modern slavery that is required to be made under that applicable legislation.

### SCOPE

This policy applies to all persons working for and on behalf of the Company in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third party representative.

The Company expects all who have, or seek to have, a business relationship with the Company to familiarise themselves with this policy and to act in a way that is consistent with its values.

### POLICY

The Company has a zero tolerance approach to all forms of modern slavery within its business and within its supply chain and is committed to acting ethically and with integrity in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in its own business or any of its supply chains.

As part of our approach we have in place or will put in place the following elements of a Company programme designed to prevent and detect modern slavery including:

1. A policy which articulates the Company's commitment to prevent modern slavery within its operations and supply chains, being this policy.
2. Communication of this policy and all relevant elements of the programme to all employees throughout the Company and our business partners and supply chains.
3. The assessment of modern slavery and human trafficking risk within the Company and supply chains and the development of effective, efficient and transparent controls to reduce exposure to those risks.
4. The adoption of anti-slavery wording in contracts.
5. The adoption of appropriate due diligence on business partners, agents, contractors, consultants, sub-contractors and suppliers, coupled with the requirement that they implement procedures which incorporate the principles under the applicable modern slavery legislation.
6. Training of all relevant individuals throughout the Company so that compliance with this policy is the duty of all relevant employees at all levels and individuals can recognise modern slavery practices and take steps to avoid the same.



### REPORTING

You are required to be pro active and promptly report any suspected violation of this policy. Complaints will be kept confidential and will be dealt with appropriately.

### COMMUNICATION AND AWARENESS

Training on this policy and on the risk our business faces from modern slavery in its supply chains will be provided annually (and as otherwise necessary).

### BREACHES OF THIS POLICY

Any employee who breaches this policy by engaging in or conspiring to engage in any modern slavery conduct will face disciplinary action.

The Company may terminate its relationship with other individuals and organisations working on its behalf or engaged by it if they breach this policy.

This policy will be reviewed every two years



**JAMIE CROOKES**

Managing Director

22<sup>nd</sup> February 2024

## WHISTLEBLOWER POLICY 2024

### OBJECTIVE

Richard Crookes Constructions (the **Company**) is committed to the highest standards of openness, integrity and accountability and seeks to ensure compliance with current whistleblowing legislation.

Richard Crookes recognises that genuine commitment to detecting and preventing illegal and other undesirable conduct must include a mechanism where employees and others can report their concerns freely, confidentially and without fear of repercussion.

The objective of this policy is to ensure that concerns are raised and dealt with an appropriate way by;

- (a) Encouraging disclosures of potential misconduct
- (b) Ensure that individuals who disclose potential misconduct can do so safely and with the confidence that they will be protected and supported
- (c) Ensure that any disclosure is dealt with appropriately and in a timely manner

### 1. SCOPE

The Whistleblower Policy provides a way for 'eligible disclosers' to raise concerns of malpractice they believe to be occurring at work, or in the context of the Company's operations. Such concerns may include (but are not limited to):

- unlawful or unethical conduct;
- human rights violations;
- financial malpractice;
- fraud or corruption;
- conduct that could affect RCC's employees or clients detrimentally;
- dangers to employees, the public, the environment or financial system;
- failures to comply with the Company's Code of Conduct; and/or
- any other matters or concerns of malpractice that should be reported, including information concerning misconduct, or an improper state of affairs or circumstances in relation to the Company.

### 2. ELIGIBLE DISCLOSERS

The following persons are eligible to make disclosures under this policy:

- An employee of the Company (including but not limited to employees who are permanent, part-time, fixed term or casual); this also includes any former employee
- An individual who is an associate of the Company; and
- An individual who supplies goods or services to the Company (whether paid or unpaid) or an employee of a supplier (which may include contractors, consultants and service providers).

- A relative, dependent or spouse of any individual as described above

An eligible discloser must have reasonable grounds to suspect that the information they are divulging genuinely relates to one of the matters listed in section 1 (scope) and warrants protection. This means that even if a disclosure turns out to be incorrect, protections will still apply, provided the discloser had reasonable grounds for the suspicion.

4. PROTECTION

If a discloser raises a genuine concern under this policy, they will not be at risk of losing their job, nor will they suffer any form of detriment as a result of making the complaint. The discloser will be protected provided they have reasonable grounds and are acting in accordance with this policy.

The Company will not tolerate victimisation or conduct that causes detriment to the discloser raising a genuine concern under this Whistleblowing Policy.

The Company will ensure that the discloser’s identity is protected. This does not apply in the event the discloser has given their consent for their identity to be revealed or the disclosure is made externally to the Australian Securities Investment Commission (ASIC), the Australian Prudential Regulation Authority (APRA), a legal practitioner or the Australian Federal Police.

If a discloser requires additional support as they make a disclosure, they can utilise the company’s EAP Service.

Matters Raised Maliciously

Disclosers who maliciously raise a matter that they know to be untrue will be subject to disciplinary action. Any disciplinary action could result in the termination of the discloser’s employment (if the discloser is an employee).

5. WHO CAN RECEIVE DISCLOSURES

A disclosure may be made to the following ‘Disclosure Officers’:

- Selected Executive Team Members (Managing Director, Chief People Officer and Chief Financial Officer)
- People and Culture (Functional Heads or P&C Business Partners)
- External Authorities (ASIC, APRA, The Commissioner of Taxation (for tax related matters), a prescribed Commonwealth authority, or a legal practitioner (for the purpose of obtaining legal advice or representation)

There are two additional categories of disclosures that qualify for protection. These are ‘public interest disclosures’ and ‘emergency disclosures’ which can be disclosed to journalists and members of Parliament. There are strict requirements associated with both categories and the Company would encourage disclosers to seek independent legal advice about the requirements before proceeding with this action.

Public Interest Disclosure Act 2013 (legislation.gov.au)

6. MAKING A DISCLOSURE INTERNALLY

A discloser should specify from the outset if they wish the matter to be treated in confidence under the remit of this policy so that appropriate arrangements can be made.

If the discloser has any evidence to support their concern, they are encouraged to provide it to the person they raise their concern with.

Step 1 - If a discloser has a concern about malpractice, they should consider raising it initially with their Senior Manager. This may be done verbally, or in writing.

Step 2 - If a discloser feels that they are unable to raise a particular matter with their Senior Manager, for whatever reason, they should raise the matter with Human Resources. This can be done verbally or in writing.

Step 3 - If these channels have been considered and the discloser still has concerns, or if the discloser feels that the matter is so serious that they cannot discuss it with any of the above, they should discuss it directly with the one of the selected Executive team members listed in section 5.

If a disclosure relates to the conduct of the Managing Director, the discloser should disclose their concerns to another member of the Board, (Peter Barnes) or if required, to an appropriate external confidential party.

7. MAKING AN ANONYMOUS DISCLOSURE

If an employee would prefer to make an anonymous disclosure, they may do this through [disclosures@richardcrookes.com.au](mailto:disclosures@richardcrookes.com.au) or by contacting RCC’s People and Culture Director Lucy Arnott on mobile: 0401 167 695

This enables disclosures to be made anonymously and confidentially. Whilst we prefer disclosers to share their identity in order to facilitate an investigation, they are not required to identify themselves.

Your identity will not be disclosed by RCC unless:

- The discloser consents to disclosing their identity
- The disclosure is required to by law
- It is necessary to prevent a serious threat to a person’s health or safety

Please note that reporting anonymously may hinder our ability to fully investigate a disclosure. We encourage disclosers to maintain ongoing two-way communication with us (i.e. via an anonymous email address) so that we can ask follow-up questions or provide feedback.

8. HOW THE MATTER WILL BE HANDLED

Internally to Management

Once a discloser has informed the Company of their concern, the concerns will be examined, and the Company will assess what action should be taken. This may involve an internal inquiry or a more formal investigation where an external investigator may be appointed. The discloser will be told who is handling the matter and what path will be taken.

If the discloser has any personal interest in the matter, this should be declared by the discloser at the outset.

Through the disclosures email, the Disclosure Officer will:

- Receive the disclosure made
- Make a record of the information provided
- Carefully assess the information provided to decide the best action to take, including whether an investigation is required, to determine whether the misconduct is proven or not proven
- Keep the information provided in a confidential and secure system
- Coordinate and oversee the investigation where an investigator has been appointed
- Advise the discloser of the progress of the matter to the extent it is legally permissible and appropriate to do so (provided the discloser has given some form of contact details i.e. an anonymous email address)



- Take all reasonable steps to ensure the identity of the discloser and the person/s who is the subject of the disclosure are kept confidential

Investigation of a disclosure

Any investigation will be carried out by an impartial and appropriately skilled person.

The Company will take steps to ensure the investigator:

- is in a position to act in a reasonable time frame;
- follows and applies the principles of natural justice;
- has access to relevant individuals where reasonably possible;
- is advised of the identity of the decision maker to whom a report of findings and recommended action is to be made; and
- Keeps you informed around when the investigation has begun, is in progress and once the investigation has been finalised
- preserves the confidentiality of the investigation and report (there may be circumstances where it may not be appropriate to provide the final outcome of the investigation).

RCC will treat disclosures in the strictest confidence. All reports and records relating to a disclosure will be stored securely and able to be accessed only by authorised employees

The confidentiality provisions do not preclude anyone involved in the disclosure from sharing the information with their representative or support person or EAP.

9. DEFINITIONS

**Detriment** includes dismissal, alternation to position, discrimination, harassment, injury in employment or damage to reputation.

**Malpractice** means immoral, illegal or unethical professional misconduct or neglect of professional duty including any instance of improper professional conduct.

10. BREACHES OF THIS POLICY

Any employee who breaches this policy may face disciplinary action, up to and including termination of employment.

The Company may terminate its' relationship with other individuals and organisations working on its' behalf or engaged by it if they breach this policy

This Whistleblower policy may change from time to time. Any updates will be posted on our Intranet and be effective from the date of posting.

This policy will be reviewed every two years.



**JAMIE CROOKES**  
Managing Director

22nd February 2024

# ANTI-HARASSMENT, ANTI-BULLYING & ANTI-DISCRIMINATION POLICY

1 PURPOSE

Richard Crookes Constructions (RCC) is aware of its obligations under various State & Federal antidiscrimination, harassment and Adverse Action legislation and our objective is to provide all employees with a work environment free from all forms of discrimination, bullying and harassment.

RCC will take all reasonable steps to assist all employees to be aware of their obligations under this legislation so that no employee is subjected to workplace discrimination, bullying or harassment.

2 WHAT CONSTITUTES DISCRIMINATION?

Discrimination is the identification of a person or group for special favour or disfavour.

When discrimination is based on certain grounds it may form the basis for a complaint by an employee under the State or Federal anti-discrimination legislation or under the Fair Work Act 2009 (Commonwealth). These grounds include:

1. Sex, marital status, pregnancy, parental status or careers' or family responsibilities;
2. Sexuality;
3. Transgender status;
4. Race, colour, national extraction, social origin, ethnicity or religion;
5. Physical or intellectual disability;
6. Age
7. Political belief or activity; or
8. WHS activities being conducted

Discrimination may be direct or indirect. Direct discrimination occurs when someone is treated less favourably because of their sex, racial group, age group, etc. For example, it would be direct discrimination if an employer refused to hire an applicant just because she was a woman or because of an attribute/stereotype associated with being a woman.

Indirect discrimination occurs where a rule, practice or policy, which on the face of it may appear neutral but in practice has a disproportionate impact on members of a certain group.

All anti-discrimination legislation in Australia covers discrimination on the ground of characteristics that are thought to relate generally to people of a particular status.

3 WHAT IS BULLYING?

Workplace bullying is the repeated less favourable treatment of a person by another or others in the workplace, which may be considered unreasonable and inappropriate workplace practice. It includes behaviour that intimidates, offends, degrades or humiliates a worker. This includes via the use of emerging technologies such as social networking sites.

#### 4 WHAT CONSTITUTES HARASSMENT?

Harassment is the unwelcome conduct that a reasonable person would consider offensive, humiliating or intimidating toward the person at which it is directed.

- Conduct may be verbal, written or physical;
- It will be uninvited and unwelcome;
- It may occur as a single incident or as a series of incidents
- It may be subtle and implicit rather than explicit.

A common form of workplace harassment is sexual harassment. This is behaviour of a sexual nature that is unwelcome and has the effect of offending, intimidating or humiliating the person being harassed.

Workplace harassment can also be based on other grounds including race, disability, age, pregnancy, marital status, homosexuality, transgender or HIV/AIDS status.

Workplace harassment usually consists of a pattern of unwelcome behaviour. However, it can arise from just one act. There is no requirement that the harasser intends to offend or harm in order for it to be unlawful. Simply, the behaviour need be unwelcome.

Assumptions about how a person may react must not be made. You must recognise that other individuals may react differently from you to comments and behaviour. That is why a minimum standard of behaviour is required from all persons in the workplace, which must be respectful of all employees.

Sexual harassment is not behaviour that is based on mutual attraction, friendship and respect. If the interaction is consensual, welcome and reciprocated it is not sexual harassment. However, you should also remember that even conduct which is welcome or consensual may not be appropriate in the workplace. If you are not sure whether conduct is appropriate, you should speak to your manager. Further, any personal friendships that develop should not adversely impact on your responsibilities to do your work or on the performance or productivity of your co-workers.

Behaviour of a sexual nature is unwelcome when it is not invited nor solicited by the person on the receiving end, and that person regards the conduct as undesirable or offensive. The intention or motive of the harasser is not relevant when determining whether the behaviour is unwelcome. Sexual harassment may include:

- staring or leering
- unnecessary familiarity, such as deliberately brushing up against you or unwelcome touching
- suggestive comments or jokes
- insults or taunts of a sexual nature
- intrusive questions or statements about your private life
- displaying posters, magazines or screen savers of a sexual nature
- sending sexually explicit emails or text messages
- inappropriate advances on social networking sites
- accessing sexually explicit internet sites
- requests for sex or repeated unwanted requests to go out on dates
- behaviour that may also be considered to be an offence under criminal law, such as physical assault, indecent exposure, sexual assault, stalking or obscene communications.

In some instances the harassment might take place outside the workplace. Examples might be the Christmas Party or where an employee makes unwelcome phone calls to another employee at their home or follows them home from work.

Persons can be legally held responsible for their acts, as can any person who aids, abets or encourages other persons to harass.

#### 5 PROHIBITED CONDUCT

It is unlawful and unacceptable for any employee to harass (including to sexually harass), bully or discriminate against another employee or another person with whom they come in contact through both at the workplace and in any work related context. This is irrespective of whether the relevant harassment, bullying or discrimination is such that it may form the basis for a complaint by an employee under State or Federal anti-discrimination legislation or under the Fair Work Act (2009).

It is a condition of employment with RCC that employees do not engage in any form of harassment, bullying or discrimination. It is also a condition of employment that employees cooperate with investigations by RCC into complaints of harassment, bullying or discrimination. Serious breach of these conditions may amount to misconduct and result in disciplinary action being taken against the employee, which may include termination of employment.

#### 6 WHAT TO DO IF YOU BELIEVE YOU HAVE BEEN HARASSED

If you believe that you are being harassed or bullied there are a number of important steps you should take:

- Tell the person that their behaviour is unacceptable and that it must stop. It is important to say these things to the harasser otherwise they may interpret your silence as consent. If you would feel too uncomfortable saying these things to the harasser, then report the behaviour to your manager or supervisor.
- Refer to the Dispute Resolution Procedure QAP - 6.2-002
- Report the behaviour to the Head of HR or your Manager, or Director.
- Keep your complaint confidential; this will avoid gossip and the possibility of defamation proceedings against you or the company
- If you make a complaint of workplace harassment or bullying it will be taken very seriously. The complaint will be investigated, and if found proven appropriate warnings or other disciplinary action will be taken against the harasser/bully.
- You will not be victimised or treated unfairly for making a valid complaint

You should also be aware that if you lie about a complaint, RCC will view this as a very serious matter, and you may be disciplined or dismissed.

This Policy will be reviewed every two years.



**JAMIE CROOKES**  
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22<sup>nd</sup> February 2024



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