

Modern Slavery Statement

FY 2021

Taylor Construction Group Pty Ltd

ABN 25 067 428 344

30 June 2021

Compliance update
3 February 2022

Commitment to the Prevention of Modern Slavery

Modern slavery is a crime and a violation of human rights which can take the form of slavery, human trafficking, servitude, forced and compulsory labour, debt bondage, human trafficking, child labour and employment in slavery-like conditions, all of which involve the deprivation of a person's liberty for another's personal or commercial gain.

TAYLOR understands that the construction sector (reporting entity) can be susceptible to modern slavery practices such as forced labour, and is particularly high risk due to the complexity of its supply chains and the nature of its labour-intensive, temporary workforce.

The indicators of forced labour, as identified by the International Labour Organisation (ILO), include:

- abuse or vulnerability
- deception
- restriction of movement
- isolation
- physical and sexual violence
- intimidation and threats
- retention of identity documents
- withholding of wages
- debt bondage
- excessive working and poor living conditions
- excessive overtime.

TAYLOR, as a business operating within the construction sector, is committed to acting ethically in all its business dealings and relationships. TAYLOR promotes a culture of corporate compliance, open communication, transparency and ethical behaviour by implementing and enforcing effective management systems within its business to identify, prevent and mitigate exploitative

practices that may undermine or deprive any persons within its own business or in any of its supply chains of their freedom.

TAYLOR acknowledge that addressing the risks of modern slavery is a process of continuous learning and improvement. I am proud of how much our teams have achieved in 2021, from working closely with subcontractors to inform and address risks, to undertaking new training and awareness initiatives, and engaging one-on-one with individual workers on our construction sites.

The coming year will be focused on a deeper understanding of risk in relation to spend, addressing corrective actions with our surveyed subcontractors, continuing to connect with workers on site, and elevating training and awareness across the business.

Yours Sincerely



George Bardas
Chief Executive Officer

We acknowledge that TAYLOR and its stakeholders in the supply chain are required to comply with the requirements of the Modern Slavery Act 2018 (Cth) (Act) and our Whistleblower Policy.

This statement made pursuant to Section 16(1) of the Modern Slavery Act 2018 for the financial year ending 30 June 2021.

This statement was approved by the board of Taylor Construction Group Pty Ltd on 23rd of December 2021.



Mark Taylor
Chairman of the Board
Managing Director & Founder

Contents

Mandatory Reporting Criteria Modern Slavery Act 2018 (Cth)

00	Commitment to the Prevention of Modern Slavery	02
01	Our Reporting Entities	04
02	Our Structure, Operations and Supply Chains	05
03	Identified Risks	07
04	Actions Taken	09
	Modern Slavery Policy	
	Training & Awareness	
	Employee Inductions	
	Third Party Recruitment	
05	Measuring Effectiveness	17
	Measurement and Evaluation Action Plan	
06	Consultation	19
07	Other Relevant Information	19
08	Annexures	20
	A1 Modern Slavery Procedure	
	A2 Subcontractor Invitation to Tender Template	
	A3 Taylor's Subcontractor and Supplier	
	A4 Modern Slavery Questionnaire	

Our Reporting Entities

The Directors of Taylor Corporation Pty Ltd (ABN 146 589 344) and its subsidiaries (TAYLOR) are pleased to approve our initial Modern Slavery Statement for 2021.

This is a joint statement prepared and lodged on behalf of Taylor Construction Group Pty Ltd (ABN 25 067 428 344) – the reporting entity and serves as a voluntary statement for other non-reporting entities in the Group including parent entity Taylor Corporation Pty Ltd.



Structure, Operations & Supply Chains

About us

Taylor Construction Group Pty Ltd, established in 1994 is a financially secure, privately-owned Australian company. Guided by our client-focused, relationship driven approach we have become one of NSW's most respected construction companies.

The company is owned by Mark Taylor as the single shareholder and is governed by Taylor's Senior Management Team. The Senior Management Team meets monthly to set and oversee the strategic direction of the organisation and to ensure they are up to date on business performance and activities.

The Taylor Advisory Board is made up of four industry leaders who assist Taylor in corporate governance and strategic leadership advice, providing a stable platform for the construction and property development arms of the business.

We believe that completing quality projects on time and on budget is a given, we strive to do more. The steady growth enjoyed by Taylor is the result of its considered selection of projects and strong partnerships. It is the belief in strong relationships that continues to underpin the Taylor culture and as a result we are proud that 65% of our projects are repeat business. We deliver design and construct, and refurbishment & live environment projects valued from less than \$5 million to over \$175 million across; commercial, community infrastructure, education, health & aged care, hospitality, industrial & data centres, and residential sectors. Currently, Taylor directly employs in excess of 250+ personnel.

Over our 25 year history, Taylor has built a team of 250+ talented industry experts and expanded services across our five business units; construction, refurbishment & live environments, industrial, regional, and property.

Fundamental to our culture, and what has made us truly stand out in the eyes of our people, clients, and partners are our Principles.

Our Principles are at the core of Taylor, they govern who we are, how we act and operate, and how we achieve excellence for our clients. Proud to be recognised a trusted advisor and delivery partner of choice, our Principles guide our people, our policy decisions, and everything we do.



04

Excel

Trusted Delivery Partner

We strive to build relationships with people to be recognised as a trusted advisor and chosen delivery partner.



01

Listen

Understand Each Other

We listen and ask why to define success and best deliver value.

02

Create

Connecting People and Spaces

We create spaces by focusing on the end user and connect the projects we deliver with their needs.

03

Diversity

Think Differently

We harness the diversity of thought to create innovative solutions.

Our Supply Chains

Our supply chains are best differentiated between the procurement we undertake to sustain our own office based operations (Corporate Supply Chain) and the procurement that we undertake on behalf of our clients for our contracted projects (Project Supply Chain).

During the initial reporting period 2019 - 2020, Taylor worked with some 2,135 Suppliers.

During the present reporting period ending 30 June 2021, Taylor worked with some 1,742 Suppliers.

Corporate Supply Chain

The direct procurement expenditure (excluding staffing costs) required to operate the Corporate functions of TAYLOR, represents a relatively small portion of TAYLOR's total combined Corporate procurement expenditure.

We acknowledge that regardless of the relatively small total value of this expenditure, significant modern slavery risks may still exist within this portion of our supply chain.

As part our commitment to complying with this legislation, as well as mitigating these risks, during FY21 and FY22 TAYLOR is in the process of undertaking a risk assessment of its own direct supply chains and commits to continue to do so, beyond FY22.

Project Supply Chains

The project expenditure that we undertake on behalf of our clients each year, comprises the vast majority of our total group procurement value. This expenditure is more complex and varied in nature than our corporate expenses and, as such, warrants greater scrutiny of the modern slavery risks that may exist within it.

In 2020, Taylor formed its Modern Slavery working group that continues to meet on a regular basis to determine the means by which Taylor will minimise the risks of modern slavery within its supply chains through its policies and procedures.

In 2021, the Working Group has implemented supplier assessment processes, awareness campaigns, employee training, and site worker engagement processes. All of which are outlined within this report.

In 2022, Taylor is committed to increasing our understanding of the risks of modern slavery within our supply chains, increasing employee and subcontractor awareness of these risks, and implementing the processes and measures outlined within our action plan.



Identified Risks

Our Modern Slavery Strategy and Whistleblower Protections

Taylor prides itself on being a trusted advisor and delivery partner of choice and, therefore, does not tolerate any form of human rights abuse or acts of modern slavery that fundamentally go against the business's core values.

Taylor's success is dependent upon, and built on, listening to its employees and key stakeholders. Ensuring the health, safety and wellbeing of all those who work with Taylor is our first and highest priority.

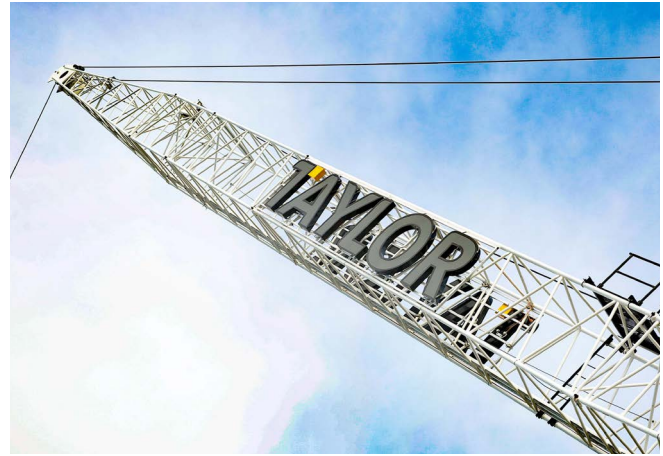
Taylor is committed to creating a dynamic workplace that is ethical, legally compliant and safe for all employees and stakeholders to raise any concerns without fear of retaliation or bullying.

Taylor expects the same level of commitment from all of its contractors, suppliers and other business partners to ensure that modern slavery is not taking place anywhere in Taylor's business, or our partners' businesses, or in any of Taylor's or our partners' supply chains.

Taylor expects that its subcontractors and suppliers will hold its own suppliers to the same standard as Taylor and that they will carry out their businesses in accordance with the Act and our Policy.

Taylor understands that construction site maintenance, cleaning and building materials supply can pose a particularly high risk of exposure to modern slavery. Taylor is committed to improving its practices and to taking important steps to combat modern slavery and has clearly defined the actions taken to identify, address and mitigate modern slavery risks within its business operations and supply chains.

We engage with a diverse range of suppliers. Additionally, our suppliers often have suppliers of their own, as do those suppliers, and so on. We are aware these sub-suppliers may indirectly affect Taylor's contribution to human rights abuses through modern slavery practices within its supply chain.



Our supply chain involves sourcing manufactured products from countries such as China, and procuring services through subcontracting. Taylor has undertaken several activities in order to pursue and achieve its business objectives in New South Wales, including;

- Direct employment of or entering into contractual agreements with Workers,
- Processing and sourcing of manufactured products,
- Construction and building services, and
- Provision and delivery of products and services.

In order to ensure Taylor conducts its business ethically and in compliance with all laws and regulations, Taylor has formal policies and procedures in place, including its Whistleblower and Modern Slavery Policy. Taylor also undertakes an annual policy compliance review with an external legal partner.

Taylor's Modern Slavery Policy outlines the minimum standards expected of Taylor and its suppliers and subcontractors. It also provides a mechanism by which any suspected or actual act of modern slavery within the supply chain, or any suspected breach of the Modern Slavery Policy, can be reported.

Additionally, Taylor suppliers and subcontractors are expected to ensure their own employees and suppliers are sufficiently trained on modern slavery risks under the Policy, and are required to declare in Taylor's Modern Slavery Questionnaire whether they have trained their new and existing staff members on modern slavery.

Modern Slavery Risks

Undertaking a scoping exercise of our supply chains, we have determined that there are several modern slavery risks that we may cause, contribute, or be directly linked to, both within our business operations and our supply chains.

Given our strong business ethics (Taylor Business Conduct & Ethics Policy), we pro-actively work to ensure we are not directly linked to modern slavery practices. However, given the nature of our supply chain in sourcing manufactured products and engaging in construction and building services, we have identified several modern slavery risks, including;

- Our subcontractors' (or their requisite subcontractors') labour standards,
- Our subcontractors' use of recruiters,
- The sourcing of manufactured at-risk products from high-risk countries such as China, Afghanistan, India, Nepal, Cambodia, Brazil and North Korea, and
- The pricing of certain materials or services below general market pricing.

Taylor is also aware that the construction industry is an area of concern for modern slavery as identified by the International Labour Organisation. Furthermore, it understands that cases of forced labour have been found in the Australian construction industry.

Whilst Taylor is not directly aware of any cases of forced labour within its business or its supply chains, it is committed to ensuring that its business and suppliers are vigilant in preventing modern slavery risks during the labour procurement process.

There have been no cases reported to date.



Actions Taken

Taylor has governance processes which identify, address and mitigate modern slavery risks and practices through the preparation and implementation of its Policies & Procedures, Modern Slavery & Whistleblower Policy, Supply Chain Sustainability School training modules for new and existing Taylor employees, and its engagement with its stakeholders to ensure compliance with the Act and Modern Slavery Policy.

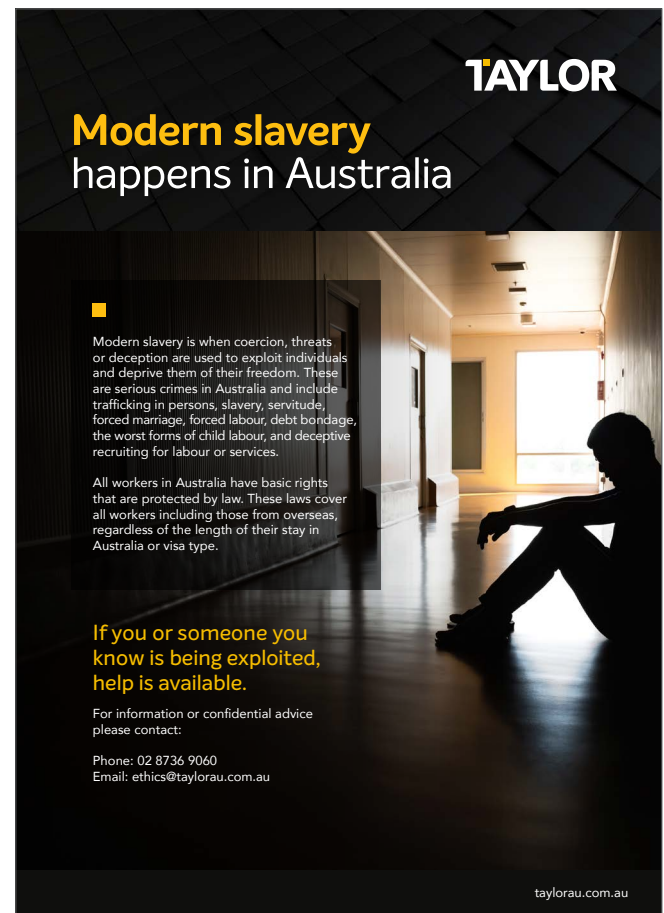
As part of Taylor’s corporate governance processes, Taylor has undertaken a significant review and amendment of its contractual agreements with its suppliers, consultants and subcontractors to ensure they;

- Incorporate the Modern Slavery Act 2018 (Cth) and Taylor’s Modern Slavery & Whistleblower Policy (‘Materials’),
- Will have completed **Taylor’s Modern Slavery Questionnaire** and certify that all the answers provided in the Questionnaire are true, complete and accurate to the best of their knowledge and understanding,
- Will train their respective employees, contractors and suppliers on the Materials,

- Will describe the actions taken by them and any contractors they own or control to assess and address associated risks, including remediation processes,
- Will describe the consultation process and how they will assess the effectiveness of recommended remediation actions, and
- Will provide contractual warranties within their agreements that they will not cause or contribute to modern slavery practices or risks, directly or indirectly, or act in contravention of Taylor’s Modern Slavery & Whistleblower Policy.

The above initiatives are effective preventative measures and ensure that Taylor is identifying, addressing and mitigating modern slavery risks that it may be indirectly linked to.

Further, Taylor has placed on all its building sites “Modern Slavery happens in Australia” posters to encourage reporting, of any concerns, by any worker on our building sites. Posters display a contact number and email address for the Taylor Whistleblower Hotline.



- Work site posters

Modern Slavery Policy

Taylor's Modern Slavery Policy is updated annually, and;

- Clearly displayed at all Taylor work sites and offices.
- Available to all staff on the company intranet.
- To be publicly available on the refreshed Company Website in Q1 2022.

TAYLOR

Modern Slavery Policy

Taylor is committed to limiting the risk of modern slavery occurring within its own business, in its supply chains or through any other business relationships.

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 slavery legislation including the Modern Slavery Act 2018 (Clth) 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.

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 representatives. 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:
 - A policy which articulates the Company's commitment to prevent modern slavery within its operations and supply chains, being this policy.
 - Communication of this policy and all relevant elements of the programme to all employees throughout the Company and our business partners and supply chains.
 - 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.
 - 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 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 proactive 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 on the risk of our business faces from modern slavery in its supply chains will be provided annually (and as otherwise necessary).

Breaches of this policy:

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

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.

This policy will be reviewed in December 2021.

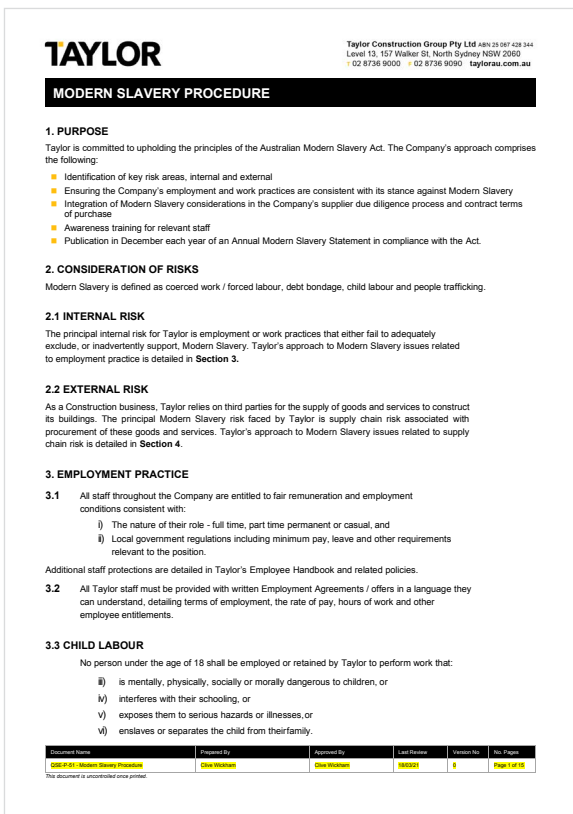
George Bardas
Chief Executive Officer

Overseas Supply Chains

Taylor has governance processes which identify, address and mitigate modern slavery risks and practices through the preparation and implementation of its Modern Slavery Compliance Program, Modern Slavery Policy, and its engagement with its stakeholders to ensure compliance with the Act and Modern Slavery Policy. Taylor has implemented the actions outline below regarding Supplier Assessment.

01. Taylor has implemented a Modern Slavery Procedure.

Please refer to **Annexure 1** for a copy of the complete Procedure



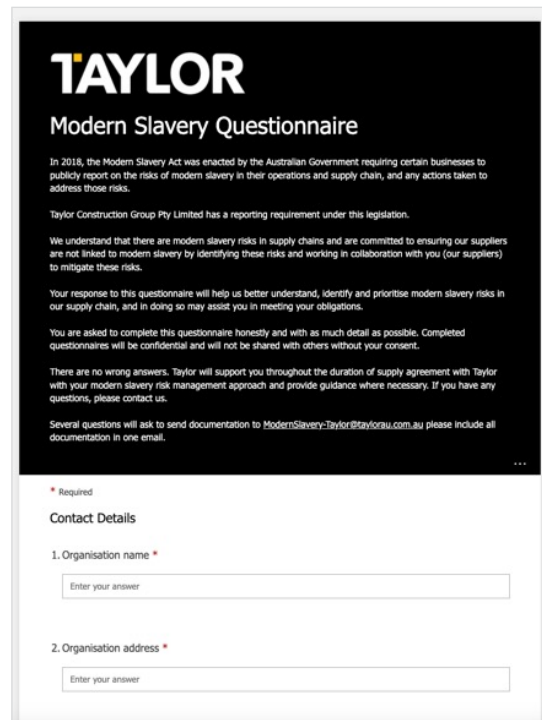
02. Subcontractor Invitation to Tender: Conditions of tendering now include a requirement to;

Comply with all applicable Australian slavery legislation including the Modern Slavery Act 2018 (Commonwealth) and the Modern Slavery Act 2018 (NSW).

Please refer to **Annexure 2** for a copy of the Invitation Template.

03. Taylor Subcontractor Survey issued to x200 Suppliers Q4 2021.

Please refer to **Annexure 3** for a complete copy of Taylor's Subcontractor and Supplier Modern Slavery Questionnaire.



Hammertech Induction Questionnaire

Complementary to Taylor's Supplier Assessment, WHSE has added an individual employment agreement questionnaire to Taylor's Hammertech log in procedures. This enables us to clarify engagement standards for all workers entering Taylor work sites. These are the questions that are asked at the time of induction.

The questions below are now asked of all workers on site at the time of induction.

01. Have you been provided with an employment contract/agreement, or have the terms and conditions of your employment been explained to you in a language that you understand?
02. Are you free to resign from your employment with your employer without restriction or penalty?
03. Are you paid your legal pay entitlements, on time and without your employer imposing monetary fines or withholding money to pay off debt?
04. Are you provided with a payslip showing how your wages have been calculated, with details of any legal deductions clearly included?
05. Has your employer advised you of what procedures are in place for you to raise concerns related to labour conditions or workplace complaints?
06. If you are Not an Australian citizen, are you still in possession of original identity-related documents? e.g., passports, birth certificates, national identity cards.

If any worker answers NO to 1 or more of these questions Taylor's Head of WHSE automatically gets a notification via Hammertech.

The Head of WHSE then confidentially forwards an email to the relevant Project Manager, asking them to speak to the individual one-on-one, in private, to address the matter and then report back to Management.

The Project Manager is also required to report any related activity formally, to senior management, within our monthly PMR Reports.

Outcomes & Learnings

To-date, investigations and individual consultations have identified that issues raised have related to incorrect answers, provided due to difficulties understanding written English. In response, questions will be reviewed and shortened for easier interpretation.

We have found one-on-one discussions an effective process for connecting with workers and checking on their employment status.



05. Modern Slavery Commitment and Subcontractor Requirements

As briefed to all Taylor Project Teams

From: Stephen Player
Sent: Tuesday, September 21, 2021 1:13 PM
To: Construction Managers <constructionmanagers@taylorau.com.au>; Project Managers <Projectmanagers@taylorconstruction.com.au>; Site Managers <Sitemanagers@taylorconstruction.com.au>; Foreman <Foreman@taylorconstruction.com.au>; CA <CA@taylorau.com.au>; Project Coordinator <ProjectCoordinator@taylorau.com.au>; Engineers <engineers@taylorau.com.au>; Cadets <Cadets@taylorconstruction.com.au>; Safety Officers <safetyofficers@taylorau.com.au>
Cc: Clive Wickham <clive@taylorau.com.au>; George Bardas <george@taylorau.com.au>; Tim Christie <TimC@taylorau.com.au>; Ben Folkard <BenF@taylorau.com.au>; Chris Bellemore <chrisbe@taylorau.com.au>; Stephen Williams <swilliams@taylorau.com.au>; Andrew Andreou <AndrewA@taylorau.com.au>; Frank Fotakis <frankf@taylorau.com.au>; Scott Bertolissio <ScottB@taylorau.com.au>; Reza Pirmoradi <rezap@taylorau.com.au>
Subject: Modern Slavery & Associated Documents

Hi All,

MODERN SLAVERY COMMITMENT BY TAYLOR

Taylor is committed to limiting the risk of modern slavery occurring within its business, in its supply chains or through any business relationships.

As part of Taylor commitment the company will comply with all applicable Australian slavery legislation including the Modern Slavery Act 2018 (Commonwealth) and Modern Slavery Act 2018 (NSW). In order to meet these commitments, attached is the Modern Slavery Policy, Procedure and associated documents to manage this process.

Attached is the Subcontractor Invitation to Tender-TEMPLATE, which has been amended to include commitment by Subcontractors, Suppliers and other business relationships to comply with the Modern slavery legislation.

Attached is the Subcontractor Tender Interview and Assessment Form QSE-F-15.05 which has been amended to include Modern Slavery questions (refer page 4) for the Subcontractor (Employer) or Supplier to respond in order to prevent/limit forced labour and exploitive practices. As part of the Hammertech Induction process a series of questions are asked to prevent/limit exploitation of Subcontractor Employees.

Attached is the CONTRACTORS HSE REQUIREMENTS QSE-F-15.23 which has been amended to include alternative duties to injured workers in their rehabilitation (refer page 7)

Please ensure that the current Subcontractor Interview & Assessment Form QSE-F-15.06 and CONTRACTOR HSE REQUIREMENTS QSE-F-15.23 are used for all future Tender Submissions. Tender Submissions which are submitted after Friday, 8th October 2021 which are not the current documents shall be rejected.

Training & Awareness

Over the past year, our organisation has commenced training for current and new employees, and our suppliers on on-site workers on the topic of human rights and modern slavery.

Supply Chain Sustainability School

Taylor is a Member of the Supply Chain Sustainability School. The School facilitates socially, environmentally and economically sustainable supply chains for all organisations in Australia and New Zealand through open access to educational resources.

All Taylor team members are now required to complete the Supply Chain Sustainability School’s *Human Rights and Modern Slavery* module by end of Q1 2022.

This training is now a compulsory component in Taylor’s staff induction process.



Supply Chain Sustainability School Register



Employee Inductions

All new employees provided information and training on your organisation’s human rights policies or expectations around modern slavery.

New Employees

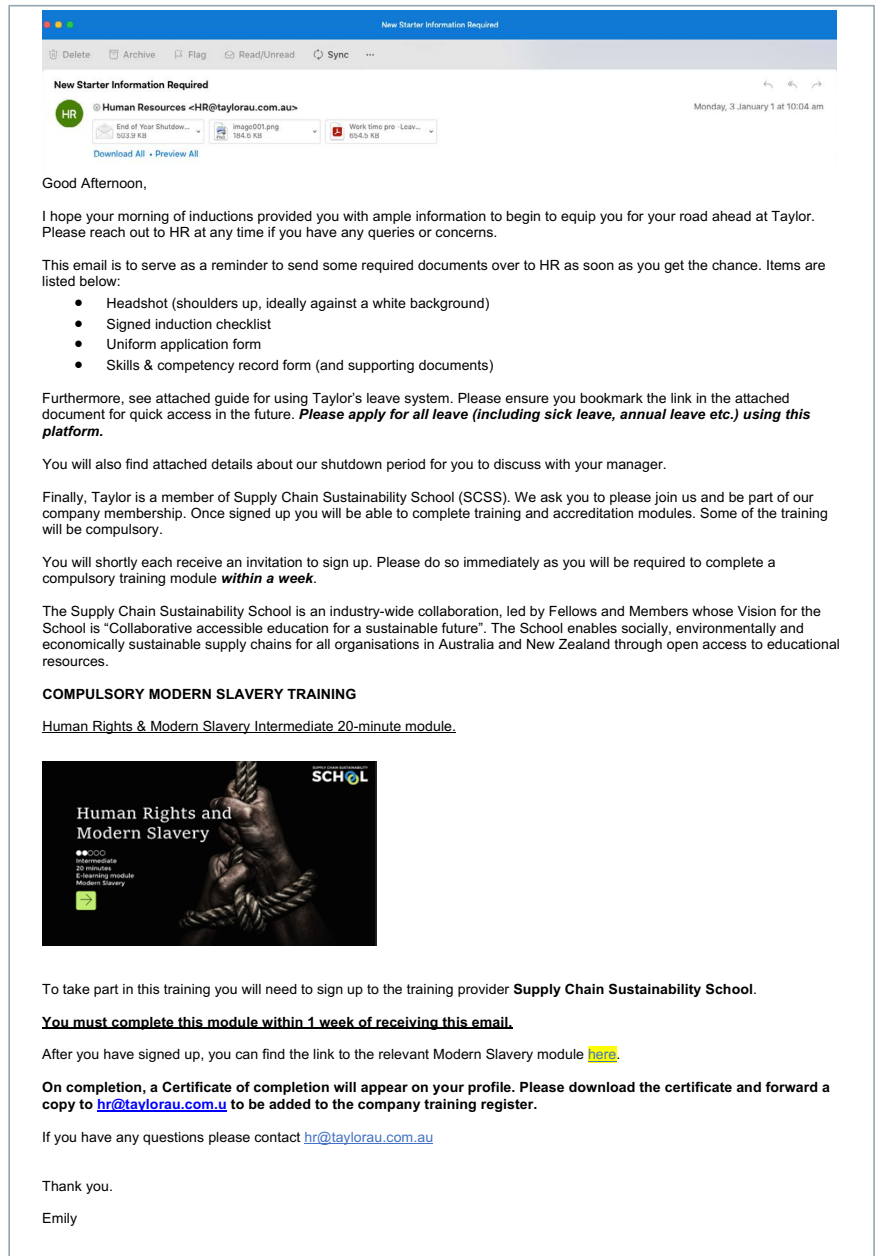
All new Taylor employees are provided our Modern Slavery & Whistleblower policies on Induction.

All Taylor Policies are readily available on the company Intranet.

Completion of the Supply Chain Sustainability School Modern Slavery E-Learning Module is now part of Taylor’s new employee Induction process. Please refer to the Induction instructions email.

Taylor has also implemented:

- A requirement for contractors’ staff on Taylor sites to watch an induction video relevant to understanding modern slavery risks on construction sites.
- A recommendation for partner organisations to provide modern slavery awareness training to all relevant staff.



Third Party Recruitment

Wherever possible, Taylor endeavours to conduct direct recruitment. In instances where project recruitment and labour hire may be outsourced by subcontractors we monitor and assess third party recruitment.

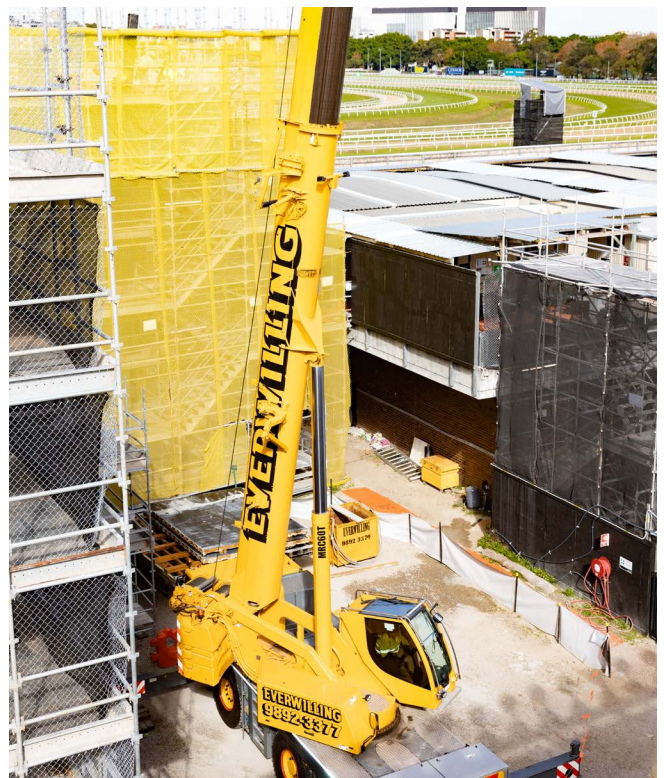
On Taylor projects sites, Taylor commits to:

- Monitor third-party labour providers or subcontractors and ask them to provide evidence of no recruitment fees paid by workers to the recruiter.
- *Please refer to information regarding Taylor's Modern Slavery Procedures and Subcontractor Questionnaire as outlined in Item 1. In addition, Taylor will add the relevant clause to QSE-F-15.06 Subcontractor Assessment Form by 31.12.21 and manage responses directly with subcontractors.*
- Directly recruit, select and hire all workers (full time, part time, temporary or seasonal), wherever possible.
- Use certified labour hire companies only where applicable - N.A. in New South Wales.
- Have contracts of employment or engagement in place with our workers and copies of the workers' contracts readily available upon request.

Taylor will not:

- Recruit workers who have paid fees to agents to gain employment.
- Have a long chain of recruiters.
- Recruit through an agency or labour provider without the above-mentioned requirements being met.

Upon request by our clients, Taylor undertakes to provide evidence of the above conditions being met.



Measuring Effectiveness

In order for Taylor to determine and ensure the effectiveness of its policies and procedures in relation to identifying, assessing, monitoring and preventing modern slavery risks, Taylor is committed to (has and/or will be);

- Introducing Modern Slavery compliance reporting to:
 - A. Monthly Project Reports
 - B. Business Monthly Reports
- Establishing regular review processes of the entity's modern slavery mechanisms.
- Regularly reviewing the entity's risk assessment processes to ensure they are current (for example, amending the policy and modern slavery questionnaire as required from time to time).
- Random auditing of suppliers.
- Setting up feedback mechanisms to provide for regular engagement.
- Conducting internal audits to determine the effectiveness of modern slavery risk mitigation strategies.
- Introducing target dates (Action Plan) for modern slavery risk policy/process implementation.
- Considering the trends in grievance reports and responses.

Taylor has introduced effective feedback mechanisms through its whistleblower initiatives. These initiatives include the reinforcement of its Whistleblower Policy to account for both identified and anonymous disclosures of non-compliance with the material provided.

This grievance mechanism ensures that instances of non-compliance are addressed. The COVID-19 pandemic is likely to raise additional issues of Modern Slavery in the workplace, making effective feedback mechanisms more important than ever.

The Whistleblower Policy is made available to Officers and Employees **and its subcontractors and relevant suppliers, and covers the following:**

- Protections available to whistleblowers, including protections under the Corporations Act.
- Who can receive disclosures qualifying for protection under the Corporations Act (protected disclosures), and how they can be made.
- How to make a qualified disclosure, and how the company will support whistleblowers and protect them from detriment.
- How the company will investigate protected disclosures.
- How the policy will be made available to officers and employees of the entity.
- How the company will ensure fair treatment of employees who are mentioned in protected disclosures, or to whom such disclosures relate.

Taylor team members have access to Taylor's latest Modern Slavery Statement on the company Sharepoint intranet. In addition, Taylor team members are now required to undertake a Supply Chain Sustainability School, Modern Slavery e-learning module, either on induction or by end of Q1 2022.

The Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth) saw the expansion of whistleblower protections by requiring eligible entities to implement whistleblower policies, and ensure mandatory criteria are addressed. Taylor is committed to maintaining policies in line with current legislation, working closely with an external legal partner to ensure compliance with any matters prescribed under the Regulations.



Taylor's Modern Slavery Measurement and Evaluation Action Plan

Updated 25 November 2021

Milestone	Performance Indicators	Completion FY20	Completion FY21	Target FY22
Policies and Procedures	Modern Slavery Policy	Published FY20		
	Whistleblower Policy updated	Published FY21		
	Modern Slavery Procedure		Completed FY21	
Due Diligence	Complete annual Informed 365 Assessment	Completed	Completed	Scheduled
	Supplier and Contractor Post Tender Interview questions	In progress	Implemented FY21	Ongoing
	Modern Slavery Questionnaire: issued to selected suppliers		Issued to x200 FY21, x20 responses received to-date	Ongoing
	Modern Slavery Questionnaire: follow up actions for suppliers			Commence
	Modern Slavery clauses in contracts	Completed FY20		
	Require subcontractor evidence of no recruitment fees paid by workers.		Add relevant clause to QSE-F-15.06 Subcontractor Assessment Form	Update as required, manage responses.
	Supplier Code of Conduct	Update in progress	Update in progress	Complete Q1 2022
	Right to work checks; Staff Inductions and Post Tender Interviews (Post Tender Interviews)		Implemented FY21	Ongoing
	Modern Slavery Strategy and Review meetings	FY20 x 3 held to-date	Conducted Quarterly FY21	Quarterly
	Monthly Project Management Report		Completed FY21	Ongoing
	Included in monthly Business/Board Report		Completed FY21	Ongoing
Training and Education	Internal staff training & inductions: SCSS Modern Slavery Module Certificate		57 Registered, 39 Certificates completed	All staff to be completed Q1 2022
	Whistle Blower + Modern Slavery Policies distribution via Intranet (online module)		Completed FY21	
	Site/Office Posters		Completed FY21	

Consultation & Other Information

Consultation

Taylor views the issues of modern slavery as being similarly aligned and of similar importance to those of Health, Safety, Environmental and Quality issues within our business.

As such, the consultation and communication of modern slavery issues is managed under the responsibilities of our Company Secretary, reporting directly to our Board of Directors.

The Human Resources & WHSEQ team will meet quarterly. Issues regarding modern slavery, human rights, worker wellbeing and similar social issues are communicated amongst this group at these monthly meetings, or otherwise, as required.

All information and resources are readily shared within the working group via a dedicated, remotely accessible Microsoft Teams group.

Other relevant information

The Australian property industry has been recognised as a leader in addressing modern slavery issues, both within their own businesses and as a collective, within the Australian economy.

As a significant supplier of services to the property industry, Taylor has a responsibility to ensure that our practices are the best they can be on all issues, but especially regarding corporate and social governance.

Over the past 12 months Taylor has accessed resources and participated in various initiatives, from;

- Property Council of Australia Supplier Engagement Platform,
- Informed 365
- Supply Chain Sustainability School, and
- Peer/industry discussion groups.

Taylor will continue to evaluate the most effective means of participation, and access to accurate knowledge and awareness of modern slavery issues, and ways in which to maximise our positive social impact.



Annexures

Modern Slavery Procedure

TAYLOR

Taylor Construction Group Pty Ltd ABN 25 067 428 344
Level 13, 157 Walker St, North Sydney NSW 2060
T 02 8736 9000 F 02 8736 9090 taylorau.com.au

MODERN SLAVERY PROCEDURE

1. PURPOSE

Taylor is committed to upholding the principles of the Australian Modern Slavery Act. The Company's approach comprises the following:

- Identification of key risk areas, internal and external
- Ensuring the Company's employment and work practices are consistent with its stance against Modern Slavery
- Integration of Modern Slavery considerations in the Company's supplier due diligence process and contract terms of purchase
- Awareness training for relevant staff
- Publication in December each year of an Annual Modern Slavery Statement in compliance with the Act.

2. CONSIDERATION OF RISKS

Modern Slavery is defined as coerced work / forced labour, debt bondage, child labour and people trafficking.

2.1 INTERNAL RISK

The principal internal risk for Taylor is employment or work practices that either fail to adequately exclude, or inadvertently support, Modern Slavery. Taylor's approach to Modern Slavery issues related to employment practice is detailed in **Section 3**.

2.2 EXTERNAL RISK

As a Construction business, Taylor relies on third parties for the supply of goods and services to construct its buildings. The principal Modern Slavery risk faced by Taylor is supply chain risk associated with procurement of these goods and services. Taylor's approach to Modern Slavery issues related to supply chain risk is detailed in **Section 4**.

3. EMPLOYMENT PRACTICE

3.1 All staff throughout the Company are entitled to fair remuneration and employment conditions consistent with:

- i) The nature of their role - full time, part time permanent or casual, and
- ii) Local government regulations including minimum pay, leave and other requirements relevant to the position.

Additional staff protections are detailed in Taylor's Employee Handbook and related policies.

3.2 All Taylor staff must be provided with written Employment Agreements / offers in a language they can understand, detailing terms of employment, the rate of pay, hours of work and other employee entitlements.

3.3 CHILD LABOUR

No person under the age of 18 shall be employed or retained by Taylor to perform work that:

- iii) is mentally, physically, socially or morally dangerous to children, or
- iv) interferes with their schooling, or
- v) exposes them to serious hazards or illnesses, or
- vi) enslaves or separates the child from their family.

Document Name	Prepared By	Approved By	Last Review	Version No	No. Pages
QSE-P-51 - Modern Slavery Procedure	Clive Wickham	Clive Wickham	18/03/21	0	Page 1 of 15

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3.4 COERCED LABOUR

No person shall be:

- vii) forced or coerced into working for Taylor, or
- viii) bound to work for Taylor to settle debts owed to the Company.

3.5 PEOPLE TRAFFICKING

Taylor explicitly prohibits the recruitment, transportation, transfer, harbouring or receipt of persons, by means of:

- the threat or use of force or other forms of coercion,
- abduction,
- fraud or deception
- the abuse of power or of a position of vulnerability
- the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

3.6 COMPLIANCE RESPONSIBILITIES

Responsibility for ensuring compliance with these employment requirements are with the CEO, CFO and People Relations Manager.

4. SUPPLY CHAIN RISK MANAGEMENT

4.1 SUPPLIER DUE DILIGENCE

A minimum of 10 suppliers annually are reviewed for Modern Slavery compliance on a rotating basis, with priority given to higher risk suppliers, determined by:

- i) The supplier's location and its relative country ranking in the [Global Slavery Index](#).
- ii) The scale of the Company's business with the supplier,
- ii) Third party evidence (for example from industry publications or whistleblowers) indicating that the supplier's industry or supplier itself may be especially prone to Modern Slavery.

The mechanism for review is the Taylor Supplier Questionnaire (refer Appendix A). In the event responses to the questionnaire are found to be deficient, Taylor will first undertake to work with the supplier to address the deficiencies. If the deficiencies cannot be adequately mitigated, purchase authority will be revoked.

4.2 PURCHASE ORDER TERMS & CONDITIONS

Taylor Purchase Order, Subcontracts and Consultant Agreements Terms & Conditions are amended to include reference to Modern Slavery in accordance with the Act.

5. AWARENESS TRAINING

5.1 Policy awareness training is conducted for existing staff involved in:

- i) Recruiting and hiring employees
- ii) Selection and approval of suppliers

New staff involved in these processes receive training at the time of induction. Staff completing the training session must sign to acknowledge receipt and understanding of this policy.

Document Name	Prepared By	Approved By	Last Review	Version No	No. Pages
QSE-P-51 Modern Slavery Procedure	Clive Wickham	Clive Wickham	18/03/21	0	Page 2 of 15

This document is uncontrolled once printed.



6. ANNUAL MODERN SLAVERY STATEMENT

6.1 A Modern Slavery Statement covering the prior financial year shall be completed and lodged by **December 31st** each year. The Statement shall be prepared in accordance with the Modern Slavery Act and shall include:

- i) Company ID
- ii) Details of Taylor structure, operations and supply chains
- iii) Risks of Modern Slavery in the business
- iv) Actions taken by Taylor to assess and address these risks
- v) How Taylor assesses the effectiveness of these measures
- vi) How Taylor translates this to our controlled entities

Document Name	Prepared By	Approved By	Last Review	Version No	No. Pages
QSE-P-51 Modern Slavery Procedure	Clive Wickham	Clive Wickham	18/03/21	0	Page 3 of 15

This document is uncontrolled once printed.

Subcontractor Invitation to Tender Template

TAYLOR

SUBCONTRACTOR INVITATION TO TENDER

Trade Works:

Project Name:

Project Number:

Client:

Closing Date:

Attention:

Email Submission:

Aconex/Procore Submission: Reply and attach submission to tender request

Taylor Construction Group ("Taylor") are the Builder for the above project. Accordingly, we invite your fully conforming tender submission for the Enter Trade Works Details.

Documentation issued for Tender:

1. This Invitation to Tender
2. The following documentation:
 - a. Drawings (as attached)
 - c. TCG Standard Subcontract Conditions
 - d. Other Documents (as attached)

We request you comply in all respects with all aspects of the Project Documentation issued. Should additional details (not contained within the Project Documentation) be required, the Subcontractor shall request the necessary information.

A) Project / Site:

.....

B) Programme:

Subcontract works shall commence:

Subcontract works to be completed:

C) Conditions of Tendering:

In submitting a Tender in response to this invitation, the Tenderer:

- 1) Warrants that the carrying out of the Trade Package in accordance with this invitation and the Project Documentation;
- 2) Offers to carry out, for the lump sum tender price, all works included in the Project Documentation;
- 3) Confirms that it has visited and inspected the site and has satisfied itself with all the conditions under which the work will be performed, and, has researched and complied with all conditions and requirements of the relevant authorities and the Project Documentation;
- 4) Successful Tenderer will be invited to enter into a Subcontract Agreement, a draft copy of which is included in the Tender Documentation;
- 5) **Complies with all applicable Australian slavery legislation including the Modern Slavery Act 2018 (Commonwealth) and the Modern Slavery Act 2018 (NSW).**

D) Contract Compliance:

Taylor Construction Group Pty Ltd

ABN 25 067 428 344

Level 13, 157 Walker St, North Sydney NSW 2060

T 02 8736 9000 F 02 8736 9090 taylorau.com.au

- Construction
- Property development
- Fitout and refurbishment

Taylor's Subcontractor and Supplier Modern Slavery Questionnaire

Modern Slavery Questionnaire

In 2018, the Modern Slavery Act was enacted by the Australian Government requiring certain businesses to publicly report on the risks of modern slavery in their operations and supply chain, and any actions taken to address those risks.

Taylor Construction Group Pty Limited has a reporting requirement under this legislation.

We understand that there are modern slavery risks in supply chains and are committed to ensuring our suppliers are not linked to modern slavery by identifying these risks and working in collaboration with you (our suppliers) to mitigate these risks.

Your response to this questionnaire will help us better understand, identify and prioritise modern slavery risks in our supply chain, and in doing so may assist you in meeting your obligations.

You are asked to complete this questionnaire honestly and with as much detail as possible. Completed questionnaires will be confidential and will not be shared with others without your consent.

There are no wrong answers. Taylor will support you throughout the duration of supply agreement with Taylor with your modern slavery risk management approach and provide guidance where necessary. If you have any questions, please contact us.

Several questions will ask to send documentation to ModernSlavery-Taylor@taylorau.com.au (mailto:ModernSlavery-Taylor@taylorau.com.au) please include all documentation in one email.

* Required

Contact Details

1. Organisation name *

10/5/2021

2. Organisation address *

3. Australian Business Number *

4. Parent company (N/A if not applicable) *

5. Contact person *

6. Contact email *

7. Contact phone *

10/5/2021

Organisation structure

8. How much visibility does your organisation have over your supply chain? *

- High: You have mapped the full supply chain for key products and services used by your organisation and have identified key suppliers at all levels of your supply chain.
- Moderate: You have identified major Tier One suppliers and have partially or fully mapped the supply chains for key products and services of your supply chain.
- Developing: You have identified major Tier One suppliers. You have very limited or no visibility of your supply chains below the Tier One level.

9. Please explain why you selected this option: *

10. Does your organisation have a policy or policies in place to deal with modern slavery? *

- Yes
- No

10/5/2021

11. Please provide details of, or a copy of, the policy or policies, including information on whether your organisation has a system to monitor compliance with these policies. If you have a copy of the policies, please email them to ModernSlavery-Taylor@taylorau.com.au (<mailto:ModernSlavery-Taylor@taylorau.com.au>). *

12. Please provide information on what your organisation is doing, or plans to do, to manage modern slavery risks. *

13. Does your organisation have a person or team responsible for overseeing modern slavery risks (including record keeping regarding contractors and subcontractors) that arise in relation to the goods or services that you deliver? *

Yes

No

10/5/2021

14. Please describe the role and responsibility of that person/team below. *



10/5/2021

Training

15. Are staff in your organisation trained on how to identify, assess and respond to modern slavery risks? *

Yes

No

16. Please describe the nature of the training available and the positions or roles of staff that receive training. Please also specify whether training is also available to other organisations or staff in your supply chain. *

17. Does your organisation plan to introduce modern slavery risk training for staff? *

Yes

No

10/5/2021

Supplier Engagement

18. Does your organisation perform screening/evaluation of all prospective suppliers to assess the risks of modern slavery or other human rights harms that may occur in its operations and supply chains? *

- Yes
- No

19. Please describe how your organisation performs this screening. *

20. Does your organisation plan to introduce measures to screen prospective suppliers for modern slavery risks in future? *

- Yes
- No

21. Are you aware of low-skilled migrant workers working in your organisation's supply chains? *

- Yes
- No

10/5/2021

22. Please provide information about where in your organisation's supply chain low-skilled migrant workers are employed. *



10/5/2021

Response processes

23. How would your organisation respond to any allegation of modern slavery or substandard working conditions in its operations or supply chains? *

24. Does your organisation engage in any other due diligence activities to identify, prevent and mitigate risks specific to modern slavery in your operations and supply chains? *

Yes

No

25. Please describe these activities below. *

10/5/2021

Additional Documentation

26. Is your organisation required to report under the Modern Slavery Act (Cth) 2018? *

- Yes. Please send a copy of your modern slavery statement(s) to ModernSlavery-Taylor@taylorau.com.au (<mailto:ModernSlavery-Taylor@taylorau.com.au>).
- No

27. Is your organisation recognised through certification / accreditation or membership of that addresses social risk, human rights or modern slavery? (e.g. Certified to SA8000, member of the Ethical Trading Initiative, prequalified to the Cleaning Accountability Framework (CAF) 3 Star Standard, using ISO20400, are Global Green Tag Modern Slavery Declaration participant, member with SEDEX, or similar) *

- Yes. Please send a copy/details of your recognition to ModernSlavery-Taylor@taylorau.com.au (<mailto:ModernSlavery-Taylor@taylorau.com.au>).
- No

28. Is there any other additional documentation you will be sending to ModernSlavery-Taylor@taylorau.com.au (<mailto:ModernSlavery-Taylor@taylorau.com.au>), *

- Yes
- No

10/5/2021

29. Please list them here. *



10/5/2021

Supplier code of conduct acknowledgement

30. Please acknowledge receipt of the Taylor Supplier Code of Conduct and make the following declaration. *

I have read and understood Taylor's Supplier Code of Conduct and on behalf of my organisation,

- Agree to comply with these requirements.
- Are unable to comply with these requirements.

This content is neither created nor endorsed by Microsoft. The data you submit will be sent to the form owner.

 Microsoft Forms

10/5/2021

Taylor Construction Group Pty Ltd

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North Sydney NSW 2060

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Website: taylorau.com.au

TAYLOR