



Modern Slavery Statement FY21

Foreword

This Modern Slavery Statement has been made pursuant to the Modern Slavery Act 2018 (Cth) by Grosvenor Engineering Group (GEG):

- Grosvenor Engineering Group PTY LTD [ABN 12 003 608 795]
- Grosvenor Engineering Group (QLD) PTY LTD [ABN 65 650 298 481]
- Grosvenor Engineering Group NZ Limited [Company No. 8191460]
- SYNTRIC PTY LTD [ABN 67 096 741 687]
- G.O.R.T PTY LTD (Grosvenor Office of Research and Technology) [ABN 83 154 849 528]

for the period 1 July 2020 to 30 June 2021, and outlines the measures set in place by GEG in identifying and addressing Modern Slavery risks to our operations and supply chain. GEG has zero tolerance to Modern Slavery, and we shall encourage the same commitment from our suppliers.

This statement was approved by Grosvenor Engineering Group Board on 10th December 2021.

Director 
Nicholas Lianos

Director 
Peter Souflias

All enquiries or feedback regarding this statement should be directed to GEG Safety team at safety@geggroup.com.au



A letter from our CEO

We are Grosvenor Engineering Group. We are a leader in technical asset management in the commercial space, maintaining and servicing HVAC, Fire, Electrical and other systems for our clients across ANZ. When it comes to outcomes for our clients, we don't just do the norm, we redefine the norm. Our purpose is to enrich people's lives by transforming the built environment. Our values include:



Safety

We are relentless about ensuring everyone returns home safe and well every day.



Agility

Our data enables us to be curious, proactive and deliver the best outcomes.



Balance

We encourage everyone to find their own ideal balance between work and life.



Partnerships

Diverse backgrounds, thinking and skills, working together, make us a force to be reckoned with.

Grosvenor Engineering Group (GEG) is passionate about bringing smarter buildings to life and creating long-term sustainable value for building owners, managers, and their occupants. At GEG, we uphold high moral, ethical and sustainable business practices. We acknowledge that Modern Slavery, including those related to human trafficking, slavery and slavery-like practices can occur in every industry and sector and have severe consequences for victims. We also recognize that human rights are an area of growing importance to our employees, shareholders, and customers.

In FY21, we commenced our journey in establishing our Modern Slavery process towards identifying and addressing associated risks. We have reached out to our key suppliers and have sought their participation in identifying practices that constitute Modern Slavery. All new suppliers being added to the business, now undergo a Modern Slavery Declaration captured via our GEG Modern Slavery Questionnaire. The data enables us to identify potential Modern Slavery risks and further consult with our suppliers in better understanding the issues. In FY22, we shall implement suitable governance frameworks to take action to combat Modern Slavery and improve the integrity and quality of our supply chains.



Nicholas Lianos
CEO & Managing Director

Table of Contents

Foreword	2
A letter from our CEO	3
Organisational Structure, Operation and Supply Chain Framework	5
Due Diligence	6
Risk Assessment and Remediation	12
Consultation and Communication	14
Monitor our effectiveness	17
Looking forward	18



Organisational Structure, Operation and Supply Chain

An Australian-owned company established in 1994, we have grown to become a leading building services provider with over \$2.2 billion of assets under management. With a proven history of delivering real business outcomes to buildings by making them safer, more comfortable, productive and energy efficient – at the lowest possible cost, GEG has developed a powerful asset maintenance and lifecycle management ecosystem.



21

Branches
across ANZ



1.4+
Million

Technical assets
under management



800+

Talented
Employees



19,000+

Properties
serviced

GEG operates nationwide. It also acts as a parent company to the following trading names Air-rite, KL Air and Harding's HVAC & Refrigeration, Dickson's Refrigeration. Our head office is based in Sydney NSW with two significant operational hubs in Melbourne and Brisbane. The head office function has responsibility for the Groups strategy, policy and governance.



With a footprint of 21 branches across Australia and New Zealand, our clients are supported by an over 800 employees workforce which include specialist engineers, technicians, project managers, estimators, site personnel and service specialists.

Given the nature of our services, our workforce is typically highly skilled and in permanent employment. We do not generally employ seasonal or temporary resources. GEG has a national supply chain with suppliers from sectors such as information, communications, technology, property services (including facility management, utilities, cleaning, waste management and security), logistics and correspondence, consulting services, marketing, print and promotional goods and services, fleet management, office supplies and corporate clothing.

Framework

GEG framework on Modern Slavery is based on a risk management approach with the objective of ensuring compliance and continual improvement. We have implemented policies and procedures to enforce ethical and legal practices and to influence appropriate behaviour in alignment with our values. They also promote protection of human rights of employees, contractors, business partners, suppliers, clients, and the communities within which we operate.

Whistle-blower Policy

GEG has implemented a 'Speak Up' platform – where reports will be confidentially assessed by an independent third-party provider. Reports can be made anonymously, and protections are in place to ensure the identity of a Whistle blower remains confidential throughout the investigation process.

Our Whistle blower Policy provides a framework to our employees and other stakeholders (e.g., contractors, suppliers, etc.) for reporting where there is a genuine concern that there has been misconduct, wrongdoing or behaviour that is not aligned with GEG company values.

Employee Code of Conduct

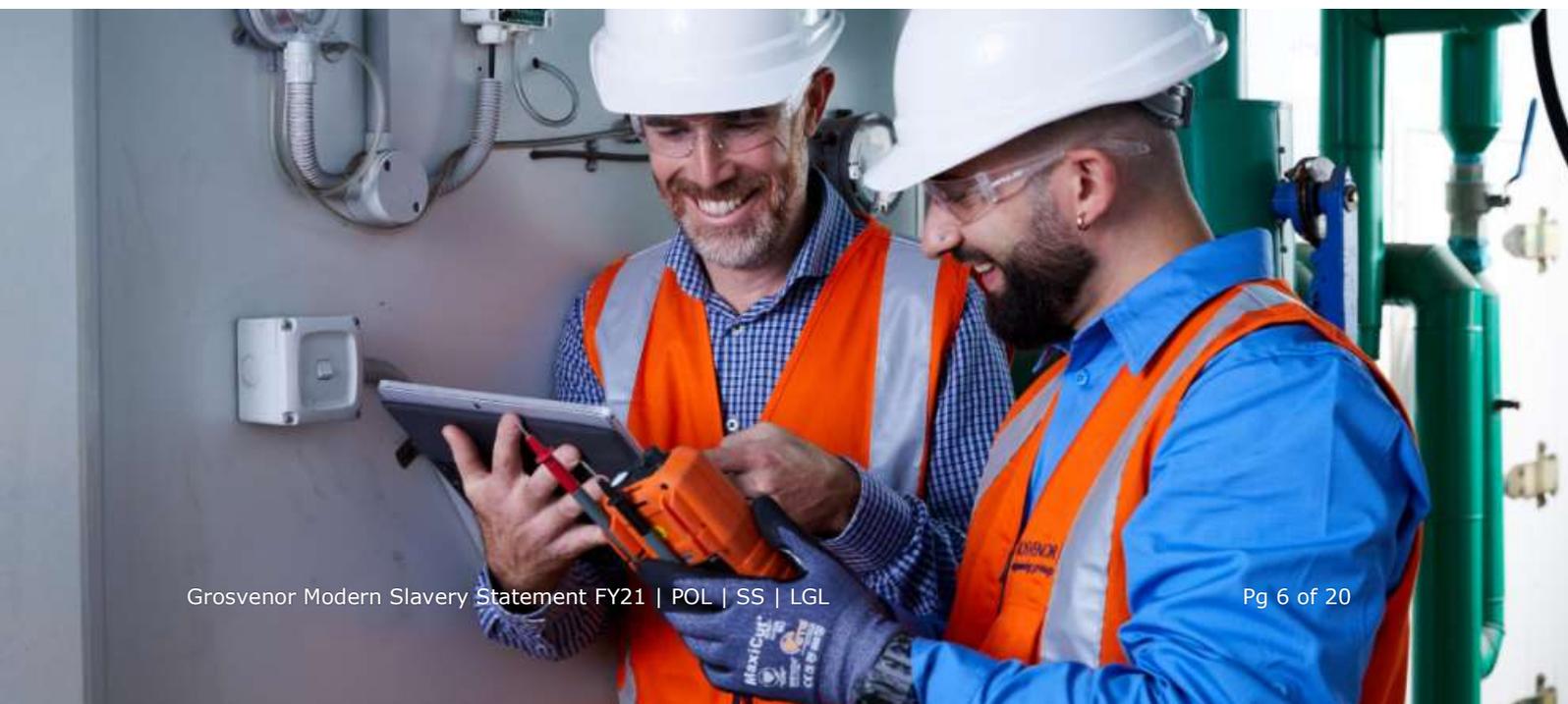
GEG Values, Key Behavioural Indicators and GEG Code of Conduct are our guiding principles. Our unique culture is driven by core values of safety, innovation, family, growth, respect, and integrity. Our values and goals are underpinned by the following principles:

- We will grow in a way that is sustainable for our clients, stakeholders, suppliers, employees, and the environment
- We will continue to balance profitability with adherence to our core values.

Our continual focus on quality data and the effective utilisation of our National Support Structure ensure that we consistently deliver expected levels of quality and service.

Bullying & Equal Employment Opportunity (EEO) Policy

We acknowledge that our employees are our most important resource and that their skills and potential should be recognised, developed, and optimally utilised.



The purpose of this policy is to ensure that all potential and current employees of Grosvenor Engineering Group are provided with equal and fair opportunities within the workplace and to promote a workplace free of bullying, harassment, victimisation, and discrimination.

We expect a work environment which is free from any form of bullying, harassment, victimisation, and discrimination, respects the diversity of our employees and is conducive to employee development and positive workplace interactions.

Supplier Code of Conduct

GEG views its suppliers as partners. Our Supplier Code of Conduct sets out the minimum standards of behaviour that we expect our suppliers to meet in the areas of labour and human rights, non-discrimination, bullying, harassment and discrimination, wages, benefits, working hours, workplace health and safety, environment, business integrity, privacy, and supplier diversity.

In alignment with our corporate values, GEG is committed to promoting ethical, environmental, and social standards throughout our supply chain, which include suppliers, contractors, sub-contractors, and consultants. This Supplier Code of Conduct provides a set of guiding principles and clearly communicates GEG expectations of our suppliers to help us make the right decisions every time. These principles operate in conjunction with our values and our need for a safe, fair, and sustainable working environment, including those relating to human rights. GEG expects our suppliers to read, understand and ensure that their business and supply chain fulfil the below principles.

Corporate Governance and ethics

Strong corporate governance and ethical behaviour are central to GEG approach to business. Suppliers must comply with all applicable laws, standards and regulations on bribery, corruptions, and prohibited business practises in the countries where they operate. Suppliers must conduct business in an ethical, equitable, transparent, trustworthy, and professional manner in all their dealings. Suppliers must disclose any part of their business operations that may not meet reasonable Australian community standards of ethics and business practices.



Labour and human rights

GEG respects human rights as set out in the International Bill of Human Rights and principles of the UN Global Compact. We expect our suppliers to respect and support the protection of human rights of workers, as well as individuals and communities affected by their activities.

We do not tolerate child labour in our supply chain and expect our suppliers to ensure compliance with relevant laws affecting forced or involuntary labour. We expect our suppliers to comply with relevant laws and regulations in relation to employment practices, wages, and benefits, working conditions and equal opportunity. Suppliers must not use deductions of wages as a disciplinary measure and must pay workers as required by law.

We do not tolerate slavery, servitude, and human trafficking in our supply chain. Suppliers must not require workers to surrender any government issued identification, passport or work permits or other personal document as a condition of employment.

Non-discrimination

GEG is committed to providing an environment in which employees have equal access to opportunities available at work. Suppliers must not engage in or support discriminations in hiring and employment practises, including on the grounds of: Age; Gender; Ethnic Origin; Religious beliefs or practises; Race; Cultural background; Marital relationship status; Disability; Physical appearance; Sexual orientation; Gender identity and expression; Pregnancy or potential pregnancy; or Parental status. Suppliers must ensure that their employees are not harassed in any way and encourage a culture of respect and inclusion.

Bullying, Harassment and Disciplinary Practices

Suppliers must provide a workplace that is free of direct and indirect discrimination, harassment, and bullying. Suppliers must not use violence, threats of violence or other forms of physical correction, corporal punishment, or torture. Mental or verbal abuse, sexual harassment or sexual abuse of employees, or the threat of any such treatments is prohibited. Suppliers must promote a "Zero" tolerance of unlawful harassment.



Wages and Benefits, Working Hours

Suppliers must provide fair pay and working conditions for employees including adequate rest periods, Leave, minimum wage requirements and must not require workers to exceed prevailing local work hours. Compensation paid to employees will comply with applicable national wage laws. Suppliers must pay employees in a timely manner and aim at providing an adequate standard of living for employees and their families.

Workplace Health and Safety

GEG is committed to promote a culture of health and safety awareness and practices to ensure risks in the workplace are identified, assessed, and eliminated or controlled. Suppliers must identify and comply with all legal responsibilities under applicable legislation of the countries in which they operate. Suppliers must ensure that their workers understand and follow health and safety policies and procedures that apply to their work.

Suppliers must provide a safe and clean environment for employees and take reasonable steps to identify workplace hazards and minimize the risk to workplace injury, illness, or disease for workers. Suppliers must obtain, maintain, and keep up to date all permits, licenses and registrations required for works carried out in accordance with local law and provide appropriate training to workers to perform their job safely.

Safety information relating to hazardous materials shall be available to educate, train and protect workers from hazards. A safe and healthy working environment also includes as a minimum: Portable drinking water; Adequate lighting, temperature, and ventilation; Clean toilet facilities and personal protective equipment. Suppliers must support workers to raise health and safety issues or concerns without the fear of disciplinary actions, dismissal, or discrimination. Suppliers must have systems, training, and emergency equipment in place to effectively respond to and manage incidents and emergencies.

GEG has implemented a 'Stop Work – Start Right' policy authorising all workers to stop unsafe work where exposure to the hazard may present serious health and safety risks.



To further improve safety culture, a 'Just Culture' Policy has also been implemented where during incident investigation, there is a balanced and unbiased accountability for both individuals, and for the organisation's WHS management system without focusing on human error alone so that an open and honest incident reporting environment is maintained without fear of punishment or blame.

Environment Considerations

Suppliers are expected to comply with all relevant local and national laws and regulations relating to the environment. Suppliers are expected to have a documented environment management policy and set targets to reduce material environmental impacts. Suppliers are expected to provide transparent and public reporting on material environmental performance. Suppliers must identify, monitor, and seek ways to maximize efficient use of energy consumptions, water, resources, and raw materials from their own operations. Suppliers must also seek ways to minimise greenhouse gas (GHG) emissions.

Risk Management

Suppliers are expected to have a risk management framework incorporating social, ethical, safety & environmental risks into their operational processes. We encourage our partners to establish a business continuity plan to minimise business impacts in the event of major disruptions, including an emergency response plan to minimise harm to employees, the local community & environment in the event of a disaster. Suppliers are expected to have appropriate information, security policies and procedures in place & secured access to our information.

Freedom of Association and Collective Bargaining

Suppliers are expected to ensure that rights in connection with freedom of association and collective bargaining are respected. Workers without discrimination have the right to join or form trade unions of their own choosing and to bargain collectively.

The employer should adopt an open attitude towards the activities of trade unions and their organisational activities. Worker's representatives are not to be discriminated against and must have access to carry out their representative functions in the workplace.



Where the right to freedom of association and collective bargaining is restricted under relevant laws, the employer facilitates, and does not hinder, the development of equivalent means for independent and free associations and bargaining.

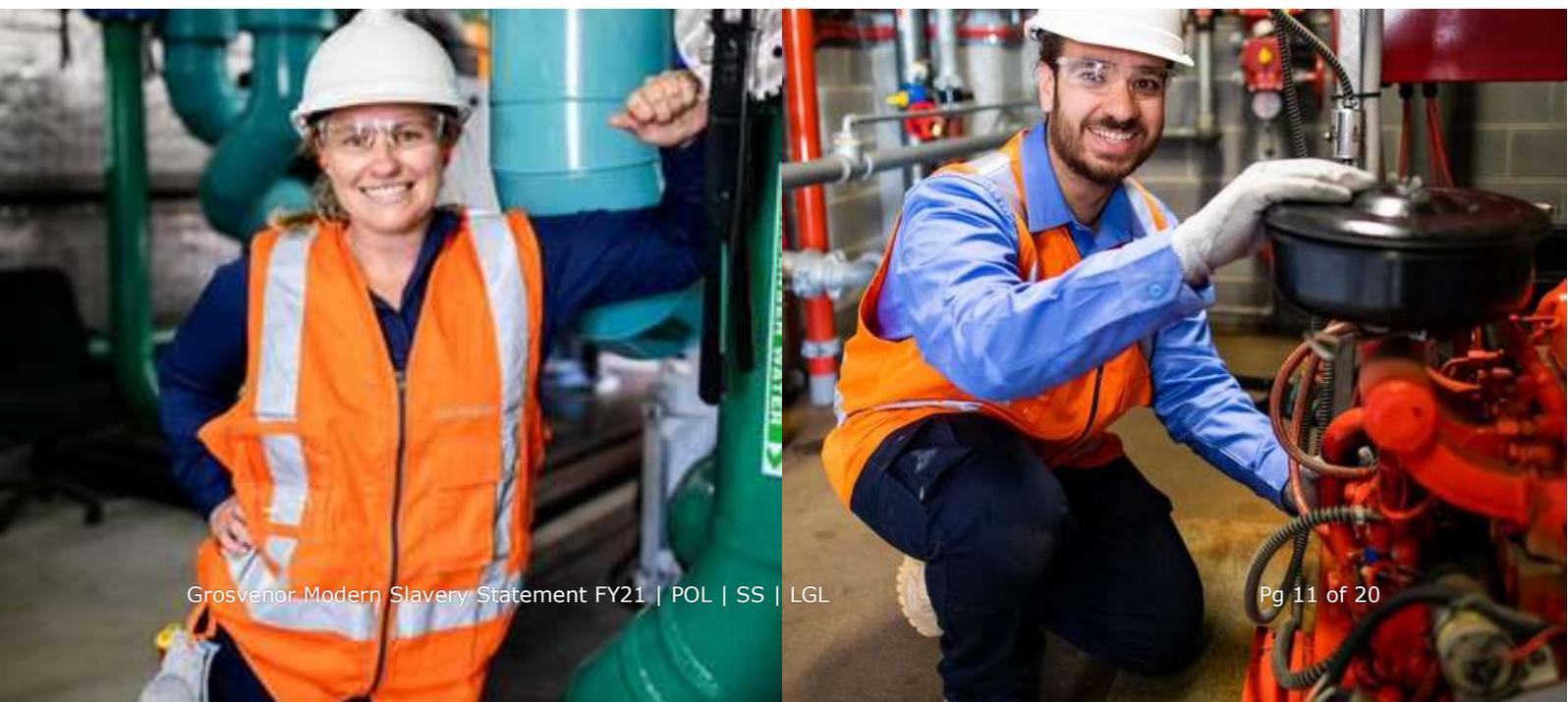
Community

GEG contributes to community development through several initiatives, including sponsorships, employee giving and strategic partnerships with charitable organisations.

GEG does not establish specific supplier expectations in relations to community activities however prefers that its suppliers share similar values in relations to community contribution and can demonstrate tangible initiatives in support of community development.

Supply Chain

GEG embraces a strong belief in the advantages of sustainable procurement and aims to collaborate with its suppliers to minimise adverse social, economic, and environmental effects of activities occurring along its supply chain. GEG is committed to helping our suppliers comply with the code and in turn, expect our suppliers to require their own suppliers to comply with similar principles to those outlined in this code of conduct.



Due Diligence

GEG works with stakeholders to identify and understand the impact of its activities and to limit negative impacts. Due diligence is exercised to prevent and mitigate adverse impacts as we seek to only do business with suppliers that have similar values and respects a safe, fair, and sustainable working environment.

GEG management of Modern Slavery falls within its overall approach to protecting human rights and is guided by our Supplier Code of Conduct document. This document outlines GEG expected standard of behaviour and conduct from our suppliers and what we stand for as an organization.

All suppliers conducting business with GEG must ensure that their operations follow applicable laws, standards and regulations that pertain to Modern Slavery and Human Trafficking. All such suppliers must have read and understood the document provided. In addition to suppliers complying with GEG Suppliers Code of Conduct, we expect our suppliers to require their own suppliers to comply with similar principles to those outlined in our Supplier Code of Conduct.

GEG endeavours to ensure that slavery, unlawful child labour and human trafficking are not taking place through our supply chain. We do this by also requiring our suppliers to provide their Modern Slavery and Human Trafficking statements to us to continue a partnership.

GEG has incorporated our Modern Slavery Statement into our "Request for Pricing" process so that future or potential suppliers are aware of our stand and position on this subject. We have incorporated our Modern Slavery position into our "New Supplier Request Form" so that each new supplier is properly advised. We have reached out to our high-risk suppliers with our GEG Modern Slavery Questionnaire and have sought their participation in identifying practices that constitute Modern Slavery. All new suppliers being added to the business, also undergo a Modern Slavery Declaration captured via our Modern Slavery Questionnaire. The data enables us to identify potential Modern Slavery risks and further consult with our suppliers in better understanding the issues.



Our vision, purpose and values are integral to the way we operate our business and is reflected in GEG policies that support assessment and mitigation of risks associated with Modern Slavery and human trafficking.

GEG Board lead this commitment and the GEG Senior Leadership Team is responsible for monitoring the implementation of Modern Slavery control measures in human resource management, operations, and supply chains. We recognise that our review and assessment of our actions to identify and address our Modern Slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to continue to build upon. To this end, we set ourselves annual goals to reach so we can look back and assess the effectiveness of our approach and inform our path forward.

We continuously review the effectiveness of our policies and processes to ensure they align with all legal and operational initiatives or obligations including the requirements of the Modern Slavery Act where applicable.

Over the next reporting period GEG will undertake the following actions to continue to follow its Modern Slavery Policy:

- Annual review of organisational risk assessment
- Implementing a governance framework that includes compliance with Modern Slavery requirements
- Maintaining supplier and partner engagement on the issue
- Educating new and existing staff
- Complying with the annual reporting process



Risk Assessment and Remediation

GEG is taking a proactive approach towards minimising Modern Slavery risks in our supply chain. We have established a risk assessment process to identify, assess, mitigate, and determine if suppliers may have a higher risk or exposure to human rights concerns including Modern Slavery and human trafficking. We have undertaken a review of the risk of Modern Slavery practices in its operations and supply chains and has not identified any high-risk areas.

Suppliers are assessed for risk and alignment against our Code, and our policies through their responses to our GEG Modern Slavery Questionnaire at onboarding and throughout the procurement lifecycle. Our standard form supply and subcontract agreements include obligations highlighting our management of Modern Slavery risk and associated legal and governance obligations.

Prevention and Mitigation

We employ an interactive process to assessing human risks in our supply chain for both new and existing suppliers. This ensures that our approach remains relevant and identifies changes where we may directly or indirectly cause or contribute to instances of Modern Slavery. We remain committed to expanding our knowledge and transparency of those risks and taking appropriate action to eliminate these, including targeting those suppliers which are of most concern.

Supplier Onboarding

Where appropriate, potential suppliers are required to provide additional information to address our concerns on human rights and Modern Slavery risk. This includes the completion of a Modern Slavery Questionnaire to articulate how those risks are mitigated and managed by their organisation. In addition, all suppliers are required to acknowledge GEG Supplier Code of Conduct, which outlines our commitments in this area and our expectations of their conduct in maintaining human rights standards including the elimination of child, bonded, forced or involuntary labour in accordance with international and domestic best practise. Where a potential supplier is not able to demonstrate their compliance with these requirements, they will not be permitted to conduct trade with us.



Renewing Supplier Agreements

Where a supplier is seeking to renew their contract, GEG Procurement team will review and determine whether further assessments on Modern Slavery compliance are required before new agreements are finalised.

Desktop Supplier Assessments

GEG shall introduce annual supplier desktop assessments where potential risks to Modern Slavery are identified based on supplier response to our Modern Slavery Questionnaire. The assessment shall focus on our first-tier, high risk suppliers and where appropriate information shall be sought from our second-tier suppliers.

In FY21, we conducted an evaluation of 25 key supplier representing our top 25 high annual spend. No Modern Slavery risks were identified. We will continue to review responses to our Modern Slavery questionnaires and evaluate new suppliers being added to our list of suppliers. We will introduce a robust governance framework and audit our suppliers as needed.

Supplier contracts

GEG has demonstrated a clear commitment to minimising Modern Slavery and human rights risks in our supply chain through our contracting process.

In FY21, we have progressively included Modern Slavery provisions within our supplier agreements, to enforce obligations on our suppliers towards compliance with the Modern Slavery Act 2018 (Cth).

The Modern Slavery provisions also require suppliers to notify GEG if they become aware of an instance of Modern Slavery in their supply chain. As per our Modern Slavery policy statement, a breach of these Modern Slavery provisions may result in GEG terminating the contractual arrangement.



Remediation

GEG is committed to remediating any identified instances of human rights and Modern Slavery abuses in our operations and supply chain. Our Policies and procedures such as our Whistle-Blower Policy, Bullying & Equal Opportunity Policy, etc. provide a framework within which our teams can raise concerns and grievances and rest assured that they will be managed fairly, independently, and impartially.

Where non-conformances or risks of Modern Slavery are identified within our supply chain, GEG will partner with the supplier to further evaluate the matter and implement a corrective action plan, while agreeing on timelines and a review mechanism.

Ongoing risk mitigation measures

GEG shall review its Modern Slavery questionnaire and align it to our improved governance process. Data obtained from the responses to the questionnaires shall be evaluated to objectively identify Modern Slavery risks. We will continue to work with our suppliers towards ascertaining these risks and resolving issues.

Increased consultation with our suppliers will promote their improved understanding of Modern Slavery risks and ensure compliance on their part and by GEG.



Consultation and Communication

GEG Board of Directors have approved the Modern Slavery and Human Trafficking Statement. GEG has communicated our Supplier Code of Conduct, Sustainable Procurement and Modern Slavery and Human Trafficking Statement company wide. We have also made the document available on our employee intranet. All three documents and expectations have also been made part of our employee on-boarding and inductions experience.

GEG has incorporated our Modern Slavery Statement into our “Request for Pricing” process so that future or potential suppliers are aware of our stand and position on this subject. We have incorporated our Modern Slavery position into our “New Supplier Request Form” so that each new supplier is properly advised.

GEG has identified only indirect risks residing within the supply chains of entities which GEG does not control (and with whom GEG has long-term relationships which cannot be terminated at GEG discretion). GEG will continue to engage with its suppliers to ensure that they are focussed on reducing such risks within their supply chains and is committed to taking action to address any risks that might arise in the future.

Training and awareness

GEG shall continue to raise awareness and build our teams knowledge of Modern Slavery within our organisation through awareness sessions.

GEG will continue to monitor the effectiveness of GEG actions to assess and address Modern Slavery risks in its operations and supply chains, particularly through further engagement with key Suppliers.



Monitoring our effectiveness

We will continue to monitor the effectiveness of our processes and procedures to address the Modern Slavery risks within our supply chain and take all necessary steps to ensure that our process and procedures are appropriate. We require our suppliers to continue to demonstrate vigilance and ethical working practices relating to Modern Slavery and human trafficking as evidenced by our due diligence process.

Measurement of effectiveness

We are committed to measuring the effectiveness of our risk mitigation actions. We monitor our supplier responses to the GEG Modern Slavery Questionnaire and try to understand how they manage Modern Slavery.

In addition, as part of our improved governance process, we will also undertake an annual assessment to understand how our business increases its visibility of and manages the risk of Modern Slavery occurring in our business and supply chains. This will include a focus on supplier relations and trends through grievance mechanisms.

Assessing effectiveness

GEG Modern Slavery framework represents an ongoing process towards compliance and continual improvement. We will continue to review our policies and procedures and establish improved monitoring mechanisms that allow us to promptly identify Modern Slavery risks and set corrective measures in place. Therefore, we will emphasise on improved supplier consultation to affect these revised processes. Our Governance process will enable us to capture potential breaches and highlight the effectiveness of our processes.



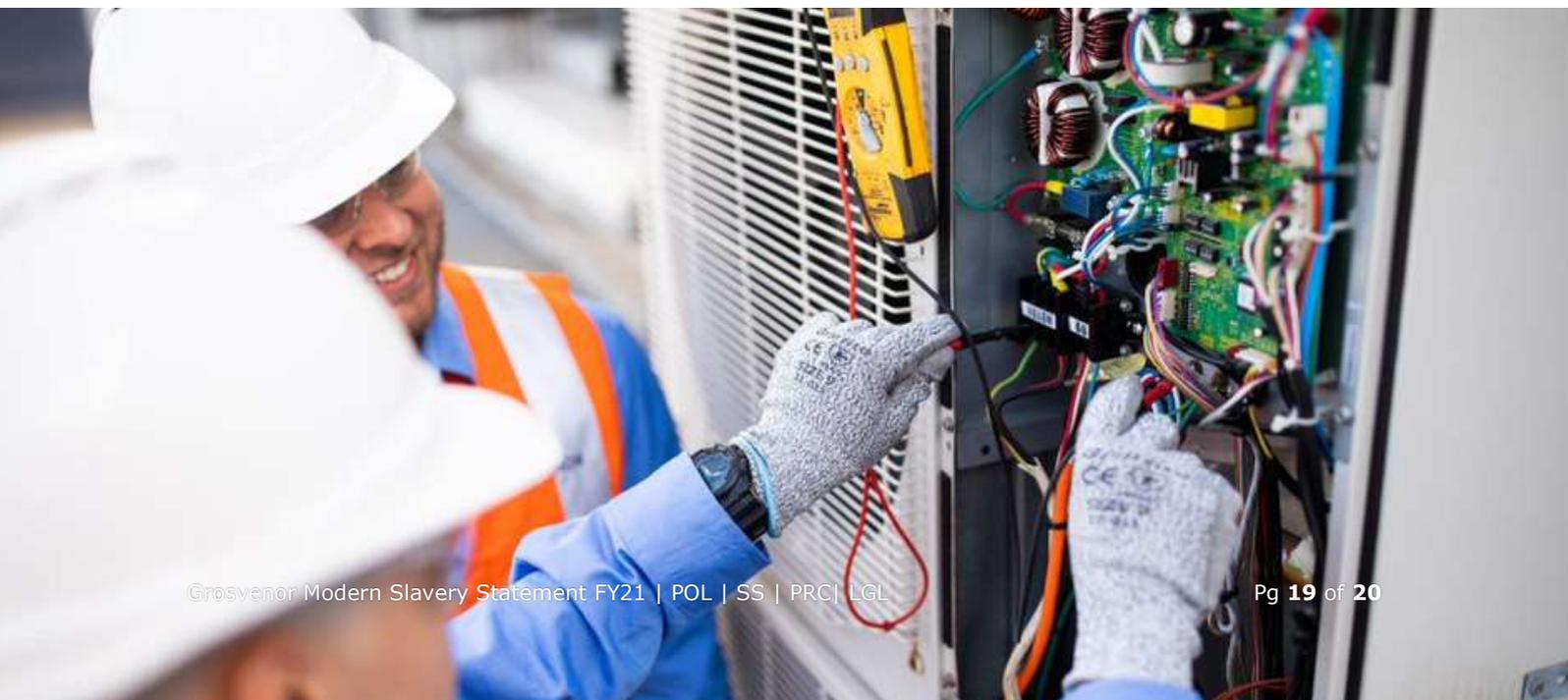
Looking forward

Over the next year, GEG look to review and further improve our processes towards effectively minimising Modern Slavery risks. We will continue to build our understanding, oversight, and management of Modern Slavery risks in our operations and supply chains.

GEG will set an improved governance framework that will continue to strengthen our ability to identify, assess and address Modern Slavery risks, and reinforce our due diligence. We will review and update our policies, practices, and procedures, as required, to maintain appropriate safeguards against breaches to Modern Slavery and Human Rights legislation.

Throughout FY22, GEG will focus closely on the below:

- Schedule training and awareness programs for both internal as well as external stakeholders
- Consistently implement a uniform and ongoing approach when liaising with new and existing suppliers towards identifying and mitigating Modern Slavery risks
- Further strengthen our supplier audit and assurance activities, in line with the contractual obligations we have implemented
- Continue engagement with suppliers to raise awareness and improve performance and corrective actions to mitigate risk
- Reinforce processes for managing potential supplier breaches to Modern Slavery requirements





For further information, please refer to GEG Safety Team