



JOINT MODERN SLAVERY STATEMENT

(Modern Slavery Act 2018 (Cth)) (Act)

Reporting Period: 1 July 2019 to 30 June 2020 (the 'reporting period')

Introduction

This statement is submitted by Jolimont Development Finance Pty Ltd ACN 094 356 779 (**Jolimont**) under the Act and sets out the actions taken by the following related entities that are reporting entities for the purposes of the Act for the reporting period (**Statement**):

- a) Jolimont (ultimate parent entity);
- b) Winslow Constructors Pty Ltd ACN 006 581 764 (operating entity) (**Winslow Constructors**);
and
- c) Winslow Infrastructure Pty Ltd ACN 119 092 385 (operating entity) (**Winslow Infrastructure**).

In this Statement, unless expressly mentioned otherwise, references to the "Winslow Group", "we", "us" or "our" refers to each of the reporting entities listed above and their controlled entities as defined in the Act.

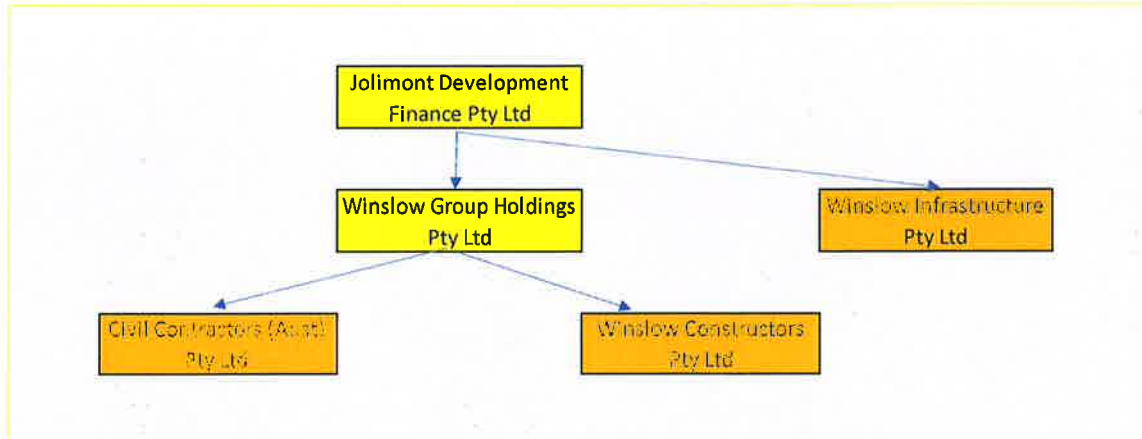
Jolimont makes this joint Statement to cover each of the reporting entities. All entities within the Winslow Group are incorporated in Australia.

The Winslow Group understand the risks of modern slavery within its industry and is strongly committed to respecting and promoting human rights and working towards eradicating modern slavery in its operations and supply chains. The Winslow Group continues to raise awareness of the risks of modern slavery in its operations and supply chains to relevant stakeholders (both upstream and downstream) and to promote the ethical, diligent, and responsible provision and procurement of goods and services in its business.

Section 2 – Structure, operations and supply chains

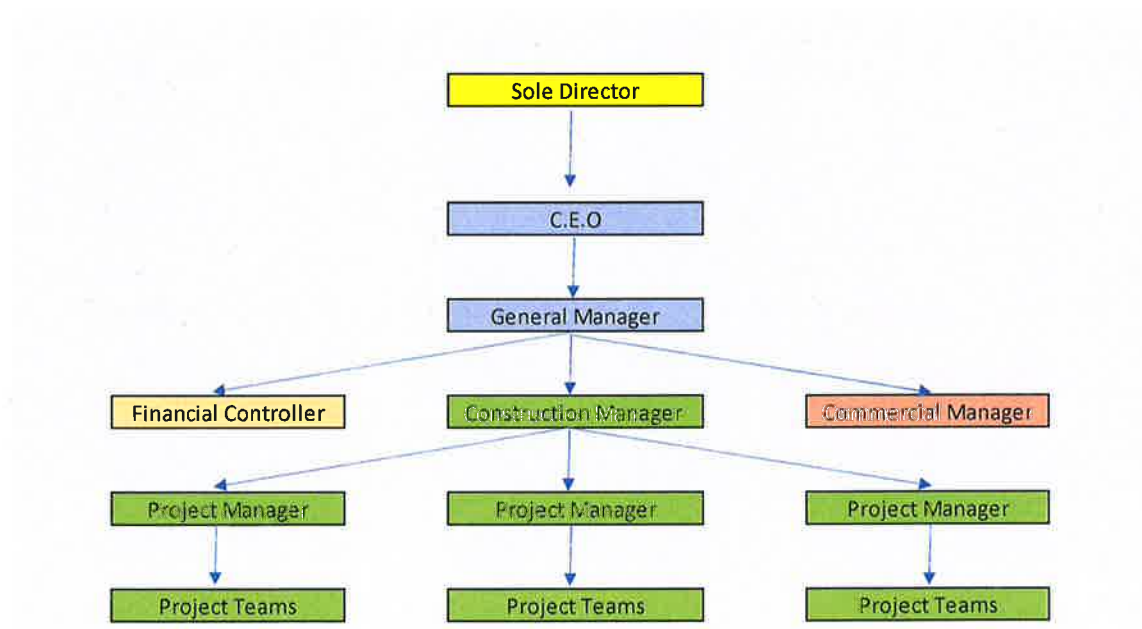
Part A – Structure

Jolimont is the ultimate parent entity of Winslow Constructors, Winslow Infrastructure, Civil Contractors (Aust) Pty Ltd ACN 169 588 194 (**CCA Winslow**) and Winslow Group Holdings Pty Ltd ACN 126 188 485 (**Winslow Group Holdings**) (please see structure diagram below). CCA Winslow and Winslow Group Holdings are not reporting entities but are controlled by Jolimont and are therefore referenced for the purposes of this Statement. CCA Winslow performs the same activities as Winslow Constructors.



Management Structure

Each entity within the Winslow Group is governed by a sole director (owner), managed by a group CEO and a senior management who provide advice on business operations.





Part B – Operations

Jolimont is a holding company operating in Australia with a Sole Director. The registered office of Jolimont is in Southbank, Victoria 3000.

Winslow Constructors, Winslow Infrastructure and CCA Winslow operate solely within Australia (with no overseas operations) in civil and infrastructure construction for property developers, private landowners, local authorities, and state government agencies.

The registered office of Winslow Constructors, Winslow Infrastructure and CCA Winslow is 50 Barry Road, Campbellfield, Victoria 3061 and the number of employees as at 30 June 2020 was more than 500 in the case of Winslow Constructors, more than 100 in the case of CCA Winslow and more than 100 in the case of Winslow Infrastructure.

Winslow Constructors, Winslow Infrastructure and CCA Winslow operate 7 facilities throughout the state of Victoria and Queensland including yards for storing machinery, equipment and building supplies. The locations are as follows:

- 1) 50 Barry Road, Campbellfield, Victoria 3063
- 2) 2 Central Boulevard, Port Melbourne, Victoria 3207
- 3) 13 Permas Way, Truganina, Victoria 3019
- 4) 712 Geelong Road, Brooklyn, Victoria 3021
- 5) 6 Latchford Street, Cranbourne West, Victoria 3977
- 6) 52-60 Wood Street, South Geelong, Victoria 3220
- 7) 1587 Ipswich Road, Rocklea, Queensland 4106

The following activities are undertaken by Winslow Infrastructure, Winslow Constructors and CCA Winslow:

- 1) Management, construction, and the delivery of civil construction solutions including:
 - a. Transport infrastructure;
 - b. Subdivisions;
 - c. Industrial subdivision infrastructure;
 - d. Road rehabilitation and maintenance pumping stations;
 - e. Land remediation; and
 - f. Sewer and water reticulation stormwater drainage pipelines.
- 2) Direct employment to carry out services in delivering the above:
 - a. Construction management services;
 - b. Professional services;
 - c. Operation of mobile plant;
 - d. Construction labour; and
 - e. Administrative services.

Part C – Supply Chains

Jolimont and Winslow Group Holdings are both holding entities and have no operating supply chains.



The supply chain of Winslow Constructors, Winslow Infrastructure and CCA Winslow includes the manufacture and transportation of products to deliver civil construction solutions. The largest category of supplier spend during the reporting period for all entities was on road pavement materials.

Examples of products sourced by Winslow Constructors, Winslow Infrastructure and CCA Winslow include imported earth material, concrete, asphalt, conduit, light poles, traffic signals, pipes, pumps, mechanical equipment, electrical equipment, and fencing.

Examples of services procured by Winslow Constructors, Winslow Infrastructure and CCA Winslow include professional services such as design, labour hire services, management services, co-ordination services, transportation services, repair services and cleaning services.

A small fraction of products used by our entities are indirectly sourced from overseas through local suppliers importing into Australia. For example, steel components of a light pole supplied by a local street lighting subcontractor may be procured from an overseas supplier.

Supplier engagement depends on the nature and extent of works the supplier provides for each construction solution. All suppliers are required to follow standard on-boarding procedures to ensure conformance with company policies.

Section 3 – Risks of modern slavery practices in the operations and supply chains of the reporting entity (and any entities the reporting entity own or controls)

The Winslow Group has conducted an assessment on the risks of modern slavery involved in its operations and supply chains.

Given the highly regulated nature of the labour market in Australia, the risk of modern slavery in direct employment within the Winslow Group is assessed to be low. The risks are mitigated through strong union presence to represent employees, adherence to industrial policies and procedures and the Winslow Group's commitment to training and development of staff. Labour hire agencies are also engaged to supply workforce resource requirements and are subject to the same level of risk mitigations, however we do appreciate that there is a higher risk with agency contracts as there is less direct visibility over these employees and their employment terms.

There is recognition of risk associated with procurement of goods manufactured or sourced from overseas countries. The key geographical locations identified as high risk relevant to the goods Winslow Constructors, Winslow Infrastructure and CCA Winslow procure include South East Asian countries. These countries could have less stringent union and industrial policies and procedures and therefore could be more susceptible to acts of modern slavery and exploitative practices such as forced labour, child labour and human trafficking.

Part A – 'cause'

The following risks have been identified that could potentially 'cause' modern slavery practices:

- a) underpaying employees (including all of those that contribute to the operations identified in section 2 hired directly to perform services within the business;
- b) breach of an employee's rights under their employment contract;
- c) directly engaging under skilled, temporary or seasonal labour to perform labour activities;



- d) directly engaging foreign workers; or
- e) recruitment strategies.

Part B – ‘contribute to’

The following risks have been identified that could potentially **‘contribute to’** modern slavery practices:

- a) obtaining cheaper rates from suppliers through competitive procurement or ongoing negotiation during projects to meet budget expectations;
- b) engaging suppliers that may be at risk of contributing to modern slavery practices including third party labour hire companies;
- c) engaging subcontractors who will procure goods from high risk overseas geographic areas to complete the contracted works; or
- d) delivery time frames and the impact on cost.

Part C – ‘be directly linked to’

The following risks have been identified that could potentially **‘be directly linked to’** modern slavery practices:

- a) initial tendering of trade packages (via supply chains) noting this is competitively carried out;
- b) contracting external labour (that may be in connection with any of the sections above); or
- c) procuring international goods through an agreement with a local supplier (i.e. geographic risk) which may involve countries that have not ratified international conventions relevant to modern slavery.

Section 4 – Actions taken by the reporting entity (and any entity that the reporting entity owns or controls), to assess and address those risks, including due diligence and remediation processes

The Winslow Group has taken and continues to take the following steps to address the risks identified in Section 3 are assessed, addressed and if necessary, remediated through corrective action.

The Winslow Group has commenced various actions to reduce the risk of modern slavery in its operations and supply chain. These actions are be embedded in our procurement practices across all entities within the group.

We understand that addressing the risks of modern slavery goes well beyond documentation, therefore Winslow Constructors has appointed its procurement team to assess any high risk situations in relation to each entity within the Winslow Group. This team will be responsible for the management and implementation of these procurement practices and remediation where applicable.

Part A - Modern Slavery Policy

A Modern Slavery Policy has been introduced to complement the existing employee code of conduct and whistleblower policies. The Policy identifies and sets out the actions that will be taken to identify, assess and address the risk of modern slavery in the Winslow Group's operations and supply chains. This Policy will be regularly reviewed and updated as required.



The Policy applies to all persons working for or providing goods and services to any entity within the Winslow Group in any capacity, including all suppliers, employees, directors, offices, agency workers, sub-contractors, and consultants.

The Policy is accessible by employees within the shared database and an internal communication has been sent to notify employees of the Policy.

The Policy will be accessible to existing third party suppliers when a communication is issued along with requirements to adhere by completion of a questionnaire.

New supplier onboarding procedures will now require each supplier to acknowledge that it understands and will adhere to the Policy.

Part B - Supplier Modern Slavery Questionnaire for Existing Suppliers (to be completed annually in conjunction with each financial year)

Although third party suppliers may not be required to report on modern slavery, to avoid indirectly engaging in modern slavery practices, existing suppliers within the Winslow Group will be required to be made aware of their obligations in their own supply chain to meet the Modern Slavery Policy by completion of a questionnaire. The Winslow Group intends to implement this questionnaire in the near future to cover the following matters:

- a) awareness of the *Modern Slavery Act 2018* (Cth);
- b) confirmation that the supplier is not engaged in any modern slavery practices;
- c) confirmation that the Supplier, if encountering an act of modern slavery, has an effective internal remediation procedure;
- d) confirmation that the Supplier is educated as to the modern slavery risks in their operations and supply chain; and
- e) a direction that the Supplier openly communicates any acts it identifies in its own supply chains.

This questionnaire will be required to be completed annually by all suppliers.

Part C - On-boarding Requirements for New Suppliers (Modern Slavery Questionnaire)

The Winslow Group plans to implement the 'modern slavery questionnaire' in the near future and the Modern Slavery Policy will be included as part of the on-boarding process of new suppliers within the Winslow Group.

Part D - Purchase orders and Subcontractor agreements

All purchasing orders and subcontractor agreements will include a clause addressing modern slavery risks stating that 'the Supplier will comply with all laws, codes, standards, regulation, legal requirements and directions relating to Modern Slavery'.

Part E - Remediation Processes

The Winslow Group is not aware of any incidents of modern slavery in its operations or supply chains during the reporting period.

In the instance where an issue is identified, an investigation will be conducted, and remediation actions will be determined which may include:



1. immediate cessation of engagement with the supplier (internal or external);
2. review and amendment to existing procedures;
3. review of similar suppliers to identify if similar risks are identified in respect of such suppliers and their supply chain; and
4. if appropriate, the preparation of a communication to all suppliers (internal and external) to flag the risk in an attempt to ensure that the issue does not occur again.

Section 5 – How the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks

The following risk procedures and actions are reviewed annually and will be reviewed immediately after a modern slavery incident or matter is identified (whichever occurs first):

- a) Modern Slavery Policy;
- b) Modern Slavery Questionnaire for Existing Suppliers;
- c) Modern Slavery Questionnaire for New Suppliers;
- d) Engagement of Suppliers (through agreements); and
- e) Remediation Processes.

The following routine steps will be in place to assess the effectiveness of the actions set out above:

- a) Regularly checking each process upon implementation into each internal or supplier system; and
- b) Conducting audits between internal disciplines (e.g. administration, commercial, operations) to ensure all relevant risks have been incorporated and/or considered.

Section 6 – Process of consultation with any entities the reporting entity owns or controls

In the preparation of this Statement, Jolimont has taken steps to engage Winslow Constructors, Winslow Infrastructure and CCA Winslow (as well as Winslow Group Holdings) on the modern slavery risks in its business, operations, and supply chains so that any risks can be identified, assessed and addressed appropriately.

This Statement has been approved by the Sole Director of Jolimont on behalf of the Winslow Group.

A handwritten signature in black ink, appearing to read 'Dino Strano', written over a horizontal dotted line.

Signed,

Dino Strano

Director, Jolimont

JOLIMONT DEVELOPMENT FINANCE PTY LTD

ACN 094 356 779