

MODERN SLAVERY STATEMENT

2022

PURPOSE

The purpose of this document, the AJG Modern Slavery Statement, is to recognise and report the actions we have undertaken to assess and address the modern slavery risks in our operations and in our supply chains during financial year 2022, in compliance with the Modern Slavery Act 2018.

OUR COMMITMENT

AJG Australia (AJG) is committed to conducting business in an ethical, legal, and socially responsible manner.

At AJG, we recognise that slavery and human trafficking can occur in many forms. This can include slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services. AJG is fully committed to operating responsibly and establishing and adhering to the highest ethical standards. We will not tolerate any forms of slavery or human trafficking in our business or in our supply chain.

AJG has the vision to provide 'safe, quality places to live, work and thrive for all Australians'. The AJG Way is to 'build a better tomorrow' which defines how we conduct our business internally and externally and sets the foundation on which the business operates and succeeds. Our business is built on trust, reliability, and honesty to deliver a vast and complete range of interconnected services to our customers and clients.

OUR VALUES

DEPENDABILITY -We do the right thing, are reliable and pride ourselves on quality work. We build strong relationships that stand the test of time.

HONESTY -We are transparent in all that we do. We believe in being straight up and clear in our communication, with each other, our trade network, and our clients.

EMPATHY -We are often first responders and deal with fundamental issues in everyday lives. We strive to show compassion and understanding, especially at difficult times.

COMMUNITY - We are a national organisation with a local attitude. We work from the ground up, listening and adapting, to ensure we are always doing the best for our customers.

These values include doing the 'right' thing including valuing our people and our community, ensuring safety, and creating an environment where people speak up on concerns. AJG recognises the importance of community and therefore always endeavours to ensure works are managed and completed by local trades, utilising local services and local staff, with the addition of a national support network.

OUR BUSINESS

AJ Grant Building Pty Ltd has been operating in the building industry since 1992 to provide building and home repairs, maintenance, renovation, and modifications for residential and commercial properties. AJG is an incorporated company, domiciled in Australia under the Corporations Act 2001 (Cth). Australian owned and operated with offices across Australia, AJG delivers solutions in a variety of sectors, including Education, Government, Retail, Insurance and Real Estate.

We bring together the right people for the job and actively cultivate a culturally and gender diverse workforce. With over 300 employees and 2000 trade partners, our diverse team includes various trade professionals such as carpenters, plumbers, electricians, and engineers as well as providing expertise in claims management, business management, information technology, functional, project and site management.

As a nominated insurance builder, AJG's core operations consist of assessing, quoting and co-ordinating the repair and/or restoration of insured premises, primarily residential, through our sub-contractor network of trades. AJG provides:

- 24/7 Make Safe and Emergency Response service to its clients and customers.
- Disaster Relief: Our emergency response team is skilled and experienced in conducting temporary repairs to ensure the property is made safe, secure, and free from further damage.
- AJG are industry leaders in responding to catastrophic events and providing the best service and support to insurance clients, customers, and homeowners; and
- BuildPRO is our custom-built claims management system that has been designed, developed, and utilised by AJ Grant Group to help provide a more streamlined, comprehensive service to our insurance partners.

AJG Australia is now the parent brand of three building brands, each with its own specialisation, united in the vision to provide safe, quality places in which to live, work and thrive for all Australians. AJG Australia is also the parent brand for EssentialIT, an IT consultancy service. All brands share the unifying values of honesty, dependability, empathy and community and a driving purpose to provide quality services with professionalism and care.



Our commitment is to be competitive, reliable, quality services. Through these values AJ Grant has built trusted processes and systems to establish ourselves as a reputable insurance builder and restorations specialist Australia-wide.

Expertise in: INSURANCE, RESTORATIONS, EMERGENCY REPAIRS
ajgrantgroup.com.au



We're a national provider of home modifications, property maintenance and building services. We deliver tailored solutions taking a proactive, collaborative, and caring approach.

Expertise in: HOME MODIFICATIONS, PROPERTY MAINTENANCE, BUILDING SERVICES, PRIVATE DOMESTIC WORKS
homecarerepairaustralia.com.au



Specialising in industrial and commercial construction, Publiq has become a trusted partner for new builds, renovations, and refurbishment. Publiq specialise in building for the community in sectors such as Healthcare, Education and Government

Expertise in: HEALTH, EDUCATION, GOVERNMENT , GENERAL
publiqcommercial.com.au



Essential IT works with Sydney businesses across all industries and equipping them with the tools they need to make sure their network drives success.

Over the past two decades, we have developed a solid reputation for working with clients in various capacities – from resolving single problems on an ad-hoc basis, to providing support in an ongoing capacity across the entire range of IT needs. Expertise in: END TO END IT, INFRASTRUCTURE MANAGEMENT, CLOUD SERVICES, MICROSOFT 365

<https://www.essentialit.com.au>

ACCREDITATIONS



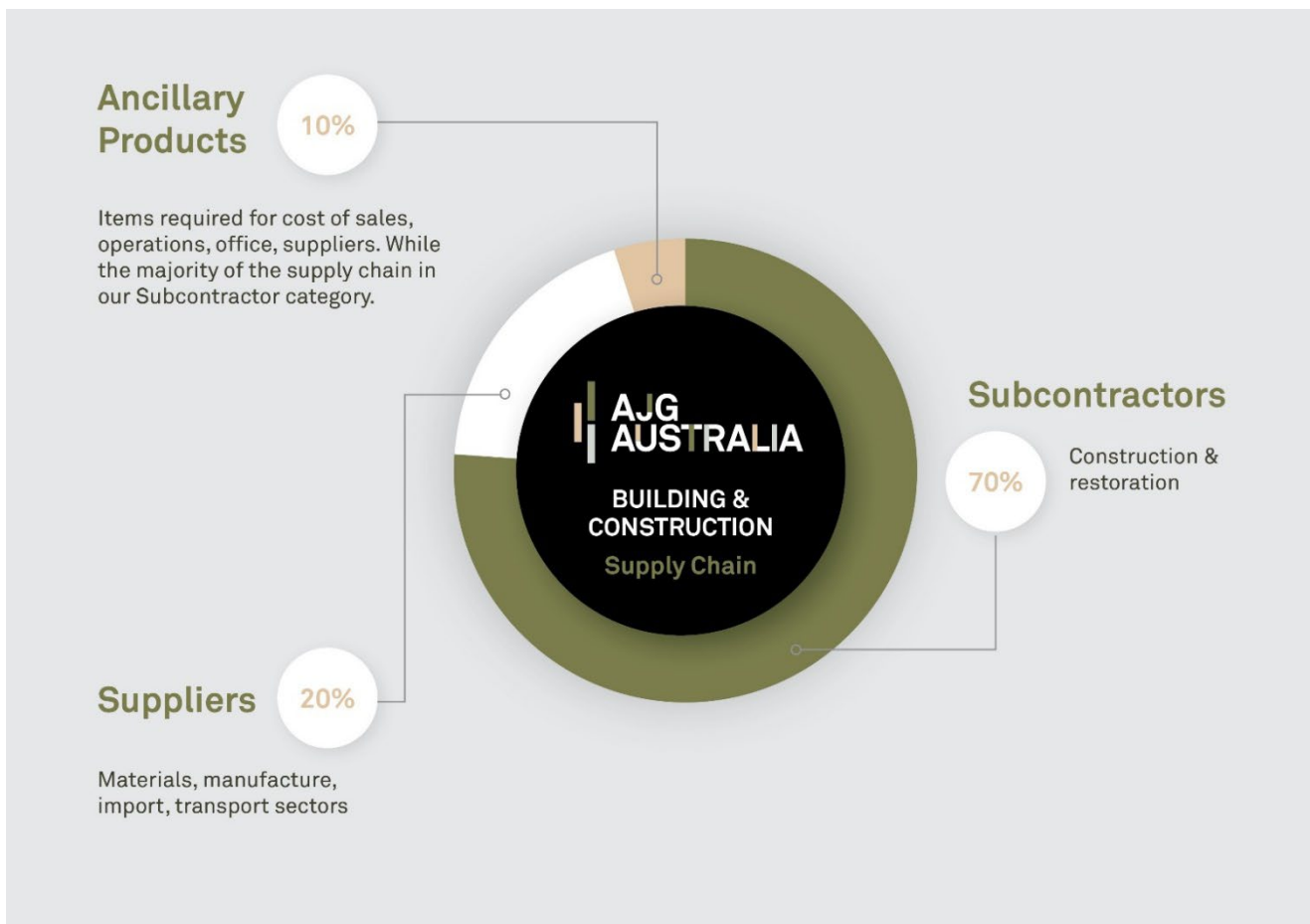
We are
the builders
that care.

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OWNERSHIP, OPERATIONS AND SUPPLY CHAIN

AJG is 100% Australian privately owned, and led by our Directors (& Founders), C-suite executives and Executive General Managers. With more than 30 years' experience in providing a diverse range of civil and building construction services to government and private clients, AJG delivers quality projects around the country.

The management team includes functional expertise in Group Projects, HR, IT, Workplace Health, Safety and Quality, Customer service, Marketing & Business Development. Additionally, a Senior Leadership team support and lead the business delivering commercial, national operations, insurance assessing, insurance repairs, strategic partnerships, supply chain and account management outcomes. AJG currently employs over 300 FTE across its 12 offices. AJG Australia and has operations in 7 States and Territories throughout Australia. AJG has over 3000 direct contractors and suppliers across the following categories.



*Ancillary Products includes but is not limited to - property agents, promotional merchandise, fleet management, consultants, office consumables, technology & IT support, Cleaning, consultants, labour hire providers, uniforms, PPE, temporary labour agencies

POTENTIAL RISKS IN OUR OPERATIONS AND IN OUR SUPPLY CHAINS

AJG has considered risks that may possibly cause, contribute and/or be directly linked to modern slavery practices. AJG has considered risk factors such as the sector, industry, types of products and services, geographic locations, and business models. AJG acknowledges that the diversity of products and services provided to AJG by subcontractors and suppliers can potentially expose AJG to modern slavery risks in the supply chain, particularly further down the supply chain. However, all contracts are with clients and contractors who are based in Australia. AJG is a reputable company with strong cultural values demonstrated with systems and processes in locating, identifying, assessing, and managing subcontractors and suppliers. Internally, all employees are expected to complete an interactive and assessable learning program on Modern Slavery practices and policies to communicate our commitment and ensure an understanding of responsibilities under the Act to control any associated risks. This content is included in our initial employment inductions and will be provided in refresher training.

As the higher risk presents further down within our supply chain, AJG and the entities it controls adopt a collaborative approach with suppliers to combat modern slavery. AJG continues to build-out our supplier relationship program focusing on national partnerships with preferred suppliers that we can also share with our contractors. We are forging long-term strategic partnerships with an array of different suppliers relevant to our industry and general business. AJG has procurement frameworks and onboarding criteria that outline our expectations prior to a contract being awarded.

POLICIES AND GOVERNANCE

AJG sets policy and governance from the Board of Directors and Senior Leadership Team.

AJG has a suite of formal policies in place that are intended to promote ethical and legally compliant business conduct. Our policies contribute to our commitment to prevent violations of human rights such as modern forms of slavery in our business including our Workplace Health and Safety approach, Discrimination Policy, Recruitment Policy, Code of Conduct, and our Whistleblower Policy.

Discrimination Policy

AJG is committed to creating a workplace environment for its employees, and persons who work on behalf of AJG, free from unlawful discrimination.

Recruitment Policy

This policy includes wording 'AJG complies with the Modern Slavery Action 2018 (Cth) and does not engage individuals to perform unpaid work, nor do we tolerate child labour practices and managers must act on any matter brought to their attention in accordance with this Policy

Code of Conduct

AJG's Code of Conduct sets out conduct expectations and applies to AJG's employees. Under this Code of Conduct, all employees are expected to act consistently with fundamental AJG values, ethical behaviour, respect for others and accountability and transparency in their business conduct. It details expectations on Personal Conduct, Professional Conduct, Stewardship of company resources and Protection and Promotion of AJG's reputation. The Code specifically notes compliance "with the *Modern Slavery Action 2018 (Cth)*, does not engage individuals to perform unpaid work nor do we tolerate child labour practices." This code also provides protections against conflicts of interests and bribes in AJG's business and supply chain.

Whistleblower Policy

AJG's Whistleblower procedure which includes a confidential and anonymous reporting process, was completed, and made available in September 2021 and applies in respect of its business operations and supply chain. AJG is committed to ethical practices across all areas of our business and encourages reporting to an independent provider of any information regarding misconduct, the existence of an improper state of affairs, illegal activities, unethical behaviour, breaches of legislation, behaviour which is oppressive, discriminatory or grossly negligent, unsafe work practices, serious risks to public health, safety or the environment or any conduct which poses a serious risk to health and safety of any person at the workplace. This policy specifically references "non-compliance with the *Modern Slavery Action 2018 (Cth)*" as improper conduct reportable under this policy. To date, zero instances have been identified.

Workplace Health and Safety Practices

Safety and compliance are paramount in our workplace to ensure our workers are protected and return home to their families at the end of each day. As part of our commitment to WHS and providing an open and on-going dialogue with our contractors, we will continually share information that is imperative to the safety of our workers, our contractors and their workers and business as a whole.

All suppliers to AJG are also expected to provide their employees with a safe and healthy working environment to prevent accidents and injury and minimise exposure to health risks. Suppliers shall comply with the health and safety laws and regulations in the jurisdictions in which they operate and provide, though not limited to, the following:

- (a) Clean and safe facilities
- (b) Occupational health and safety training
- (c) A system for injury and illness reporting
- (d) Protective measures to prevent injuries/illnesses to workers.

Environmental Practices and Standards

This standard relates to the AJG commitment to comply with all environmental laws and regulations applicable to our operations. Such compliance shall include, but is not limited to, the following items:

- (a) Obtaining and maintaining environmental permits and timely filing of required reports
- (b) Proper handling and disposal of hazardous materials
- (c) Monitoring, controlling, and treating discharges generated from operations.

ACTIONS TAKEN THIS REPORTING PERIOD

During this reporting period the responsibility for AJG's Modern Slavery compliance and ongoing continuous improvement shifted within the business from Human Resources to the newly formed Supply Chain team, causing some delay in the execution of the planned initiatives. Several initiatives were undertaken to set the foundations for next reporting period.

Supplier Code of Conduct

AJG has created a Supplier Code of Conduct, although it has not yet been communicated to the supply chain. It will form part of the newly designed onboarding process.

AJG Modern Slavery Awareness Module

AJG has delivered Modern Slavery Awareness education to all 304 AJG staff, with the mandatory requirement to complete an online training module and obtain an expected pass result. To date, 96% of employees have completed the training.

Supplier Modern Slavery Awareness Module

AJG created a Modern Slavery Awareness package which will be distributed to all existing AJG suppliers and form part of the onboarding process for new suppliers. Their participation and acceptance will be tracked and recorded.

Structure

In late 2021 AJG created a National Supply Chain Team to oversee and enhance the procurement, performance, and compliance of our large supplier network. The structure now includes a team of 9 dedicated professionals and includes a Governance Advisor and a Supplier Performance Team.

MEASURE OF EFFECTIVENESS OF ACTIONS

AJG conducted a procurement process review and implemented a newly developed Head of Supply Chain. This has led to development of robust contractual terms requiring subcontractors and suppliers to comply with legislative obligations including those relevant to mitigating the risk of modern slavery and AJG's practices, policies, and procedures.

All suppliers to AJG are required to fulfil our terms and conditions, adhere to our policies and operate within the applicable legal requirements. Our supply chain team has been designed to focus on all supply chain facets and may request additional information from suppliers regarding their compliance efforts and/or engage in additional monitoring activities to confirm supplier's compliance, including on-site inspections of facilities, use of questionnaires, review of publicly available information or other measures necessary to assess supplier's performance.

This reporting period was focussed on internal education and setting the foundations for success. The effectiveness of the improvements in policy, process and procedures will not be fully realised until the next reporting period.

MOVING FORWARD

AJG is focused on continuously improving our awareness and response to the risk of modern slavery in our business and supply chains. This includes regulating and improving policies and procedures that are designed to ensure that we are doing everything within our power to address all forms of modern slavery risks in our operations and supply chains. More specifically, we are committed to taking proactive steps to prevent, detect and report modern slavery practices, and to ensuring that people at all levels of our supply chains do the same.

To further strengthen governance and controls around modern slavery risks, AJG is committed to completing the below activities in FY23 reporting period:

- Continued engagement with our employees with Modern Slavery training and communication;
- Providing our suppliers with a compulsory Modern Slavery Awareness Module and tracking their participation for both existing and potential contractors prior to onboarding;
- To ensure continuous improvement and a deeper awareness of the risk within our supply chain, investigate the benefits on procuring an online modern slavery questionnaire module;
- Creation of a Supplier Performance Management Framework;
- To ensure Modern Slavery becomes a standard agenda item for all tier 1 and 2 supplier performance meetings;
- Report and take other appropriate action if any modern slavery practices are discovered in our operations and supply chains.

Future plans to enhance the measures AJG has already undertaken, as set out above in this statement, supports commitment to effectively identify and address any potential risk exposure of modern slavery in the business and supply chain as part of the ongoing modern slavery roadmap.

This statement was approved by the AJG Australia Board of Directors.

A handwritten signature in blue ink, appearing to read 'Adam Grant'.

Adam Grant
Director

A handwritten signature in black ink, appearing to read 'Robert Nicholls'.

Robert Nicholls
Director