

# Modern Slavery Statement - 2023

## INTRODUCTION

Insurance Building Australia Holdings Pty Ltd (ACN 661 804 879) (**Insurance Building Australia Holdings**) is the ultimate parent company and 100% owner of Ambrose Construct Group Pty Ltd (ACN 661 832 140), Inserve Australia Ltd T/A Construct Services (ACN 147 747 859), Marshall Restorations Pty Ltd (ACN 649 011 325), FEN Australia Pty Ltd (ACN 649 011 601), Xtreme Clean Sanitisation & Restoration Pty Ltd (ACN 619 183 238), and Scope IT Services Pty Ltd (ACN 644 530 727)(collectively, **the Group Entities**).

The Group Entities operate in the same sector, have similar operations and have many shared suppliers and provide this statement collectively to satisfy the Group Entities' reporting obligations under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**). In accordance with the Modern Slavery Act and associated guidelines, this statement sets out a consolidated description of the steps that the Group Entities have taken, and are continuing to take, to assess and reduce risks of modern slavery within the Group Entities' business and supply chains, and plans for review and improvement.

This modern slavery statement has been approved by the board of directors of Insurance Building Australia Holdings on behalf of the Group Entities.

## Purpose

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

The Group Entities are opposed to slavery in all its forms, including human trafficking, slavery, servitude, forced labour, deceptive recruiting for labour or services, debt bondage, forced marriage and unlawful child labour. The Group Entities are committed to promoting ethical business practices and policies that protect workers from being abused and exploited, both within our own business and our supply chain.

The Group Entities are committed to limiting the risk of modern slavery occurring in their businesses, ensuring there is transparency in the approach to tackling modern slavery throughout their supply chains.

The Group Entities expect employees and suppliers to share their commitment to help ensure modern slavery does not exist in their businesses and our supply chains.

## Who we are

A leading provider of insurance repair building services, the Group Entities have been providing specialist insurance repair services for more than 30 years.

From first response make safes, restoration, assessing and reporting of damage, through to repairs, the Group Entities are committed to returning insured customers to their homes in the same or better condition than it was prior to the insurable event. The Group Entities specialise in using local staff and trades to repair the homes in their suburbs and towns. The Group Entities proudly partners with Australia's biggest and well-known insurers and loss adjusters to support their customers in their time of need.

## Supply Chain

The Group Entities each have a relatively simple supply chain. Goods and services needed for day-to-day operations are procured from many building material suppliers operating in Australia and subcontract trades who provide equipment and construction related services.

The Group Entities' long-term strategic relationships with key suppliers, provides stability in their supply chains and procurement processes.

## IDENTIFYING RISKS OF MODERN SLAVERY

## Operations

The Group Entities have assessed the risk of modern slavery within their operations to be low. The directly employed workforce is only employed in the labour market in Australia, which is highly protected with strict regulations that apply to all employment conditions reflected in individual contracts and industry awards.

A whistle-blower policy and procedure details processes and communication pathways for employees, and suppliers, to disclose misconduct in our business and supply chain without recrimination.

## Supply Chain

The Group Entities have exposure to modern slavery supply chain risks being in the construction and restoration sectors. This risk is across two areas:

1. Contractors; and
2. Goods and materials.

### Contractors

The vast majority of the Group Entities' supplier operations are based only in Australia. These suppliers have a lower risk of modern slavery occurring in their supply chains, as their operations are Australian based and are also required to comply with the Modern Slavery Act within their own supply chains. It is acknowledged that the construction and restoration sectors are at risk of forced labour in the Global Slavery Index country profile for Australia on account of the higher rate of migrant labour who enter Australia on temporary visas.

### Goods and material suppliers

The Group Entities procure goods and materials directly, from large material suppliers like Bunnings, and indirectly when contractors procure materials themselves in line with contracted work agreements.

Consideration has been given to the Group Entities' modern slavery risks, or potential risks, within the Group Entities' supplier operations and supply chains. The Global Slavery Index has identified the top five most valuable products imported by Australia that are at risk of being produced under conditions of modern slavery.

Product	Source countries
Garments	Argentina, Brazil, China, India, Malaysia, Viet Nam, Bangladesh
Fish	China, Ghana, Indonesia, Thailand, Taiwan
Electronics	China, Malaysia
Textiles	China
Solar Panels	China

Source: <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

The Group Entities potentially have exposure to four products on the short list as set out in the table below.

Shortlisted products	Relevant goods or materials
Garments	Uniforms, workwear, PPE
Electronics	IT, computers, tablets, phones
Solar Panels	Solar Panels
Textiles	Uniforms, workwear, PPE, house furnishings



**AMBROSE CONSTRUCT**  
GROUP

## ADDRESSING MODERN SLAVERY RISKS

### Measures taken by the Group Entities

All contractors are required to agree to terms and conditions which specifically address Modern Slavery ensuring they are all aware of the requirements and are implementing the Modern Slavery provisions in their own businesses.

For larger material suppliers, their Modern Slavery Statements are reviewed to ensure they have implemented and are managing the Modern Slavery provisions in their businesses and supply chain here and overseas.

New suppliers are also assessed during the onboarding process to ensure they have adequate steps to mitigate modern slavery risks in their organisations and supply chains and commit to following an ethical sourcing policy.

The Group Entities maintain a close working relationship with their suppliers and encourage transparency and clear communication about modern slavery risks. The Group Entities are committed to ongoing monitoring of their supply chains in order to ensure that their operations are consistent with the Group Entities' requirements and take any further action as necessary, including termination of any engagements.

### **Governance framework and policies**

The Group Entities have a strong corporate governance framework and as part of their commitment to informing employees and suppliers on modern slavery risks. The Group Entities conduct training with all employees on the requirements of Modern Slavery and it forms an integral part of onboarding process with new staff.

The Group Entities also have in place a whistle-blower policy that is made accessible to all employees, workers, suppliers and persons entering worksites. The whistle-blower policy and procedure details processes and communication pathways for employees, and suppliers, to disclose misconduct in our business and supply chain without recrimination.

Standard procurement agreements and processes are regularly reviewed to ensure that the Group Entities have sound governance processes in place to meet modern slavery compliance requirements.

## ASSESSMENT OF ACTION TAKEN TO ADDRESS MODERN SLAVERY RISKS

The Group Entities' modern slavery processes and internal governance are reviewed on an ongoing basis. The Group Entities have:

- created an internal Modern Slavery Policy and developed a Modern Slavery Program;
- implemented the assessment of new suppliers with regard to the Modern Slavery provisions to identify modern slavery risks early with new suppliers during the onboarding process and during performance reviews;
- reviewed their procurement policy and procedures to ensure inclusion of modern slavery clauses; and
- updated agreements and Trade Manuals to include contractual obligations to address modern slavery compliance so that all new Contractors commit to adherence to the new modern slavery requirements.
- reviewed the provision of IT services to The Group Entities and insourced the development and delivery of IT services.

## EFFECTIVENESS OF ACTION TAKEN TO ADDRESS MODERN SLAVERY RISKS

The actions taken to address Modern Slavery risks have been adopted and are now in the process of embedment throughout the various businesses in order to continuously assess, address and reduce any modern slavery risk in their supply chains.

### **Corporate governance**

The Group Entities will continue to review their policies and procedures to ensure that sound governance processes are in place to meet modern slavery compliance requirements; and conduct reviews of policies to ensure modern slavery compliance requirements are addressed and to increase employee awareness of the risks of modern slavery in the Group Entities' businesses and their supply chains.



**AMBROSE CONSTRUCT**  
GROUP

## CONSULTATION

This statement has been prepared in consultation with all of the Group's brands and entities (listed in the Introduction).

## FUTURE DEVELOPMENTS

In the current reporting year, we aim to continue to revise and develop our approach to modern slavery compliance to build capacity within our business to monitor and act on modern slavery risks. Some of the planned activities include:

- Corporate Commitment statement, published on the individual Group Entities websites.
- Development of an annual questionnaire for key contractors.
- Development of ongoing training on modern slavery risks.

## Awareness Raising Program

The Group Entities aim to raise awareness and strengthen our understanding of the risk of modern slavery within their businesses and their supply chain by:

- **Employees:** Ongoing training to reinforce and refresh employees' information of their role in eliminating modern slavery in the Group Entities' workplace and supply chain.
- **Suppliers:** Ongoing review and enhancement of processes and procedures to ensure suppliers are meeting and exceeding their Modern Slavery requirements within their own business and supply chain.

## APPROVAL

This modern slavery statement is made by the Group Entities for the financial year ending 30 June 2023.

This statement was approved by the board of directors of Insurance Building Australia Holdings, being the principal governing body of the Group, on 15/11/2023 (**Governing Body**).

This statement is signed by an authorised representative of the Governing Body:

Brett Ambrose

Chief Executive Officer  
15<sup>th</sup> November 2023