

# Modern Slavery Statement





The A.G. Coombs Group of Companies is committed to being an exemplar corporate citizen; respecting human rights is inherent throughout our business operations and is embedded in our core values.

**Russell F. Telford**

Managing Director A.G. Coombs Group Pty Ltd

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# Managing Director's Introduction



The A.G. Coombs Group of Companies is committed to being an exemplar corporate citizen; respecting human rights is inherent throughout our business operations and is embedded in our core values. The A.G. Coombs Group of Companies are absolutely committed to eradicating modern slavery where it may exist in our operations and supply chain by continually improving company practices and procedures and implementing new processes as necessary.

The A.G. Coombs Group of Companies has several relevant Policy Statements, including our Modern Slavery Policy Statement, Code of Conduct Policy Statement, Supplier Code of Conduct Policy Statement, Supplier Diversity Policy and associated supporting Procedures.

We recognise that as a significant purchaser of goods and services, our choices can impact communities and individuals. We recognise our responsibility to engage with suppliers who act ethically. We do not tolerate slavery, human trafficking, forced or child labour or child exploitation.

We recognise that modern slavery can occur in every industry and sector and has severe consequences for victims. We do not tolerate slavery, human trafficking, forced labour, child labour or child exploitation. We have implemented and continue to evolve the following measures:

- High level training to relevant employees, executive managers and the Board of Directors in relation to Modern Slavery.
- Developed and implemented processes to monitor and audit our supply chain, including more detailed audits being undertaken with identified high volume / high risk suppliers and subcontractors.

- Designated key personnel with responsibility to manage and implement key processes and procedures.

**Our goals for the coming years also include:**

- Additional training to relevant employees.
- Implementing further controls in our procurement process and undertaking diligence activities across our supply chain.
- Working in partnership with our suppliers and subcontractors in eradicating and evidence of modern slavery.

This statement demonstrates our alignment to the Modern Slavery Act to address slavery, human trafficking, forced or child labour or child exploitation across our supply chain. We acknowledge we have further work to do, however we are building from a solid foundation to support our future goals and commitments in addressing modern slavery.

This statement is made pursuant to section 13 of the Modern Slavery Act 2018 (Cth) in relation to the operations and supply chains of the A.G. Coombs Group of Companies for the period 1 July 2021 to 30 June 2022, and was approved by the Board of A.G. Coombs Group Pty Ltd as the parent entity on 29, June 2022

**Russell F. Telford**  
Managing Director  
A.G. Coombs Group Pty Ltd

# Our Structure & Operations & Supply Chain

The reporting entity is A.G. Coombs Group Pty Ltd and this statement relates to the following A.G. Coombs Group of Companies:

**A.G. Coombs Pty Ltd (Head Office)**

**ABN:** 49 005 653 332  
26 Cochranes Road  
Moorabbin VIC 3189  
+61 3 9248 2700

**A.G. Coombs Pty Ltd (QLD Office)**

**ABN:** 49 005 653 332  
Level 1 North Tower, 540 Wickham St  
Fortitude Valley QLD 4006  
+61 3 3848 0500

**A.G. Coombs ACT Pty Ltd (Head Office)**

**ABN:** 96 105 075 858  
Unit 106, 27 Lonsdale Street  
Braddon, ACT 2612  
+61 2 6217 5600

**A.G. Coombs Advisory Pty Ltd**

**ABN:** 89 130 969 934  
26 Cochranes Road  
Moorabbin VIC 3189  
+61 3 9248 2700

**Integrated Technical Management Pty Ltd (Head Office)**

**ABN:** 96 105 075 858  
26 Cochranes Road  
Moorabbin VIC 3189  
+61 3 9248 2700

**A.G. Coombs Servicing Pty Ltd**

**ABN:** 57 053 933 056  
2/435 Williamstown Road,  
Port Melbourne VIC 3207  
+61 3 9676 4600

**A.G. Coombs Pty Ltd (NSW Office)**

**ABN:** 49 005 653 332  
Level 8, 115 Pitt Street  
Sydney, NSW, 2000  
+61 2 8020 6000

**A.G. Coombs NSW Pty Ltd (Head Office)**

**ABN:** 60 134 239 768  
Unit 6, 4 Avenue of the Americas  
Newington NSW 2127  
+61 2 8020 6000

**A.G. Coombs QLD Pty Ltd (Head Office)**

**ABN:** 62 134 239 777  
Level 1 North Tower, 540 Wickham Street  
Fortitude Valley, QLD 4006  
+61 7 3848 0500

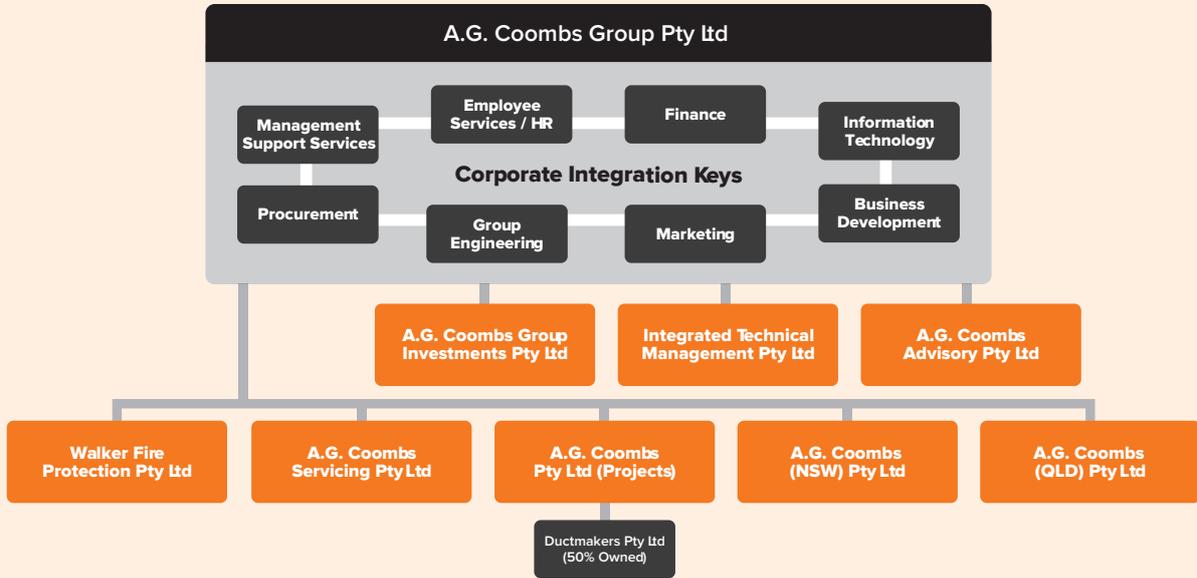
**Walker Fire Protection Pty Ltd (Head Office)**

**ABN:** 21 006 028 673  
Unit 5, 273 Williamstown Road  
Port Melbourne, VIC 3207  
+61 3 9279 7100

**Integrated Technical Management Pty Ltd (ACT Office)**

**ABN:** 96 105 075 858  
Unit 106, 27 Lonsdale Street  
Braddon, ACT 2612  
+61 2 6217 5600

# Our Structure & Operations



The A.G. Coombs Group of Companies (A.G. Coombs) commenced operations in 1945, with a 77 year heritage, and is proudly Australian owned and operated. A.G. Coombs provides an end to end capability; an integrated range of technical services for all systems in buildings, from advisory and design through to installation, commissioning, maintenance and ongoing operation and management, delivered through our specialist companies.

## A.G.Coombs | Projects

Trusted and respected major projects provider in mechanical and multi service design, construct, installation and commissioning on many of Australia’s more significant buildings/developments.

## A.G.Coombs | Advisory

Highly valued technical services and engineering advice to assist building owners and managers improve building performance, optimise energy efficiency and meet regulatory obligations.

## A.G.Coombs | Service

Responsive high quality 24/7 maintenance services for all building services and systems – delivering safe, efficient and reliable buildings.

### Integrated TECHNICAL MANAGEMENT

Operationally focused solutions for the management, planning and delivery of integrated technical building services for improved performance outcomes and cost management.

### Walker FIRE PROTECTION

Experts in complex, high-risk and mission critical sites, in the delivery of professional engineering and regulatory advice, fire systems design, installation and maintenance.

Our website provides more detailed information about our business, including our strategy, products and operations, as well as our approach to sustainability. [www.agcoombs.com.au](http://www.agcoombs.com.au)

# Our Supply Chain



# 2000+

Direct Suppliers of Goods and Services.

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that any form of slavery is not taking place in our own business or supply chains.

Since publishing our 2021 Modern Slavery Statement, we have continued to enhance our procedures and processes to manage modern slavery requirements, including the selection, engagement and monitoring of our subcontractors and suppliers.

A.G. Coombs engage suppliers and subcontractors under formal terms and conditions which outline the modern slavery obligations. Prior to engagement, suppliers and subcontractors are required to complete a modern slavery self-assessment questionnaire. We have further enhanced the auditing of our supply chain to ensure evidence of compliance. If a modern slavery incident was identified, we work through a robust process with the non-compliant suppliers or subcontractors to rectify.

The A.G. Coombs Group utilises its strong network of existing Suppliers and Manufacturers, to maximise local industry participation in its supply chain.

Goods and services are purchased by the A.G. Coombs Group of Companies Procurement Department and procurement team, to deliver works to our Clients. These are sourced through an established network of suppliers and subcontractors. During the reporting period, A.G. Coombs procure goods and services from over 2,000 direct suppliers and subcontractors. Most of our suppliers and all subcontractors are based in Australia.

We aim to play a positive role in the communities where we operate. We strive to buy local products and engage local services. As part of our commitment to local procurement, we ensure that opportunities for local industry and supplier engagement are disseminated through various channels.

We also ensure that local industries and suppliers in the areas in which we operate throughout Australia are identified and approached to increase local content where possible in the delivery of our services.



# Our Modern Slavery Risks



Since publishing our first Modern Slavery Statement in 2021, we have continued to take positive steps to ensure modern slavery is not present in our operations or our supply chain.

We have continued to implement rigorous steps into our supplier management processes to improve the way we identify, select and engage across our supply chain. This includes a mandatory requirement that all our suppliers complete a Pre-Qualification Compliance Questionnaire with questions relating to modern slavery.

Currently we have over 500 suppliers who have provided responses and supporting evidence.

Where required follow-up questionnaire and further exploring specific risk factors and any relevant policies and procedures the supplier already has in place, any known history of modern slavery or related practices and whether a supplier code of conduct has been implemented by the supplier and cascaded through its supply chains

This involves various activities such as training & education of our staff and the bolstering of our terms & conditions.

- Only approved Suppliers can be engaged to provide goods / services to the A.G. Coombs Group of Companies.
- A long established, robust approval process is in place to ensure that only suitably qualified and experienced organisations are engaged, and that roles, responsibilities, expectations and policies are clearly communicated.
- Only Proprietary Limited companies can be added to our Approved Suppliers list.
- Our standard terms and conditions for all Purchase Orders clearly states the Modern Slavery obligations of the Supplier when being engaged by the A.G. Coombs Group of Companies.
- Surveying and random spot checking of our Suppliers confirms their understanding, commitment and compliance to Modern Slavery practices. We have recently implemented a Supplier and Subcontractor self-assessment questionnaire about modern slavery into our prequalification process. All new Suppliers and Subcontractors are required to complete this self-assessment questionnaire as part of our prequalification process. We are also rolling out this self-assessment questionnaire to our existing Supplier and Subcontractor base.
- Training on Modern Slavery is provided to all key personnel who engage and interact with our suppliers, including Procurement Teams, Estimators, Project Managers and Contract Managers.



# Our Response to COVID-19

The A.G. Coombs Group of Companies are a recognised provider of essential services operating within the current and evolving COVID-19 guidelines of relevant authorities to provide all facets of building services.

We are in contact and working with various elements of government and are represented on industry boards and associations, including the Facilities Management Association of Australia (FMAA), and the Air Conditioning & Mechanical Contractors' Association (AMCA) and working closely with all relevant authorities.

The A.G. Coombs Group of Companies are working closely with our clients, service providers and suppliers, noting COVID-19 has, and continues to impact our supply chain, to ensure we continue to deliver our services.

We are managing a coordinated plan to assure the health and wellbeing of our Employees, as well as COVID-19 Business Continuity Plans to ensure we continue to operate effectively for our valued clients and industry partners. We continue to evolve service delivery in line with the rolling changes flowing as a result of the COVID-19 pandemic.

We continue to monitor and follow the directions and requirements as prescribed by the Government as the protocols required to be followed ramp up and down in terms of supply chain. These frequently changing requirements are dealt with in a dedicated A.G. Coombs Group of Companies Business Leadership Forum, convened at least weekly, with a specific agenda focussed around the impacts of COVID-19 to keep our people safe and continue our operations throughout the COVID-19 pandemic.



# Reporting and Assessment On the Effectiveness of these Actions

This Statement outlines the steps the A.G. Coombs Group of Companies has and continues to implement measures to ensure Modern Slavery is not taking place across our supply chain. We continue to undertake random spot checking of our Suppliers and conduct an annual Modern Slavery Risk Assessment to monitor changes and trends in our risk profile across both our operations and supply chain to ensure our approach to risk identification and assessment remains effective.

# Consultation Across the A.G. Coombs Group of Companies

Mr Russell Telford is the Managing Director of the A.G. Coombs Group of Companies which includes each business entity. The A.G. Coombs Group of Companies has a Board of Directors, consisting of Executive Directors and Non-Executives. The A.G. Coombs Group Board meet monthly.

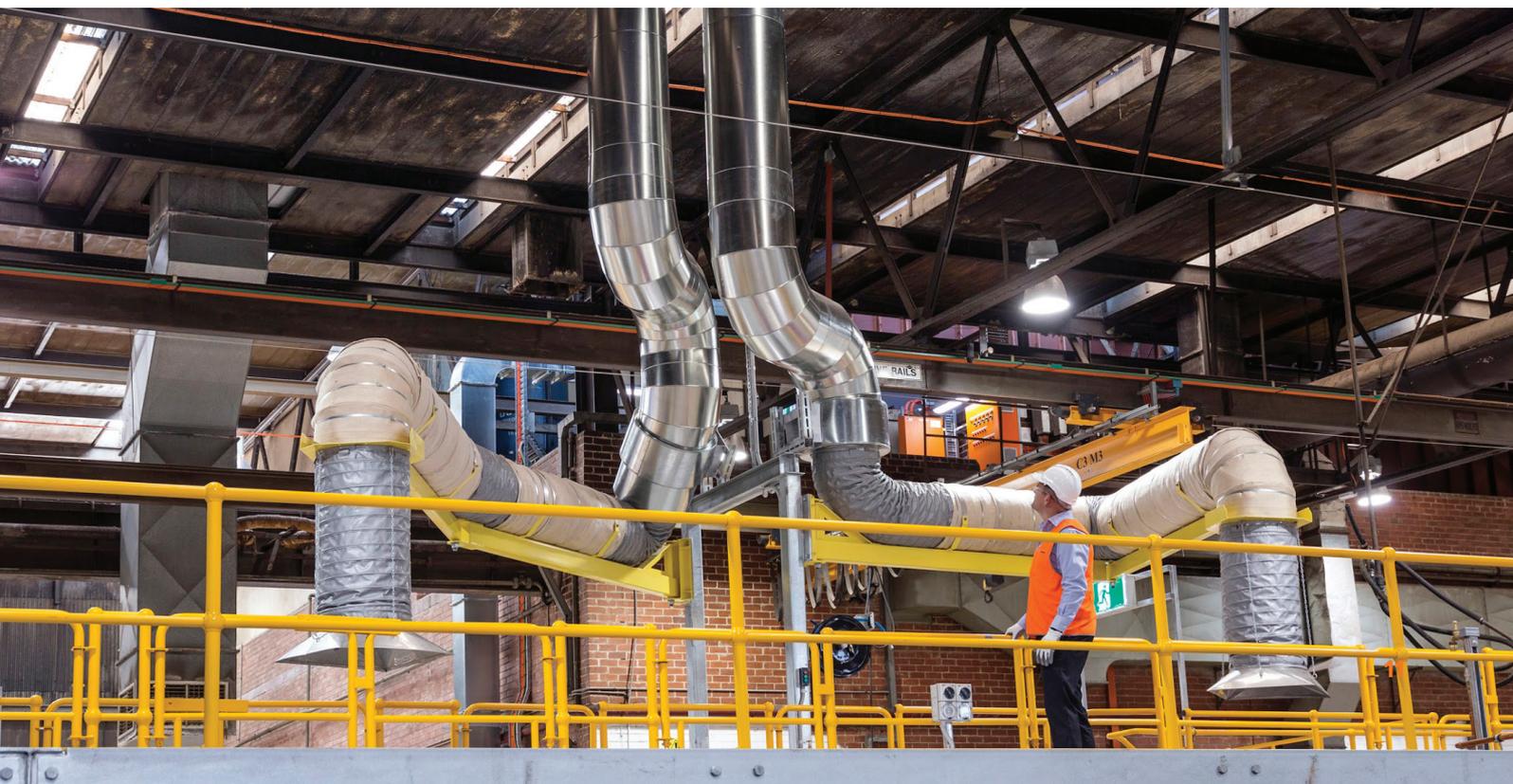
The A.G. Coombs Executive Team, which includes the General Managers of each A.G. Coombs entity are members of the A.G. Coombs Advisory Board, chaired by the A.G. Coombs Group Managing Director, which also meets monthly.

A.G. Coombs has an established committee to manage our Modern Slavery practices to ensure they are effective and continually improved.

The reporting and assessment of the effectiveness of our Modern Slavery Policies, Procedures, and actions as outlined in this Statement are reported and monitored with identified changes implemented to mitigate our risk profile across both our operations and supply chain to make sure that our approach to risk identification and assessment remains effective.

Further information is provided to all personnel of the A.G. Coombs Group of Companies to ensure we are meeting our Core Value of being a Good Corporate Citizen. This includes: Policy P-04 - Code of Conduct, Policy P-07 - Recruitment, Policy P-22 - Engagement and Management of Contractors, and Policy P-46 - Whistle-blower.

All A.G. Coombs Group of Companies Policies and Procedures are reviewed and updated on a regular basis, including review and sign-off by the Managing Director.





Bringing buildings to life.

### A.G. Coombs Group

Melbourne, Sydney, Brisbane, Canberra, Townsville.

#### A.G. Coombs Head Office:

26 Cochranes Road,  
Moorabbin, VIC 3189

**General Enquiry:** 03 9248 2700

The A.G. Coombs Group is a privately owned Australian group of companies that provides an integrated range of technical services for all systems in buildings, from design through to installation, commissioning, maintenance and ongoing operation and management. Operating for over 75 years, A.G. Coombs has a national capability with major operations on Australia's eastern seaboard.

Melbourne 03 9248 2700 | Sydney 02 8020 6000  
Canberra 02 6217 5600 | Brisbane 07 3648 0500

[www.agcoombs.com.au](http://www.agcoombs.com.au)

