

### Introduction

This statement is made by Fredon Industries Pty Ltd (ABN 12-003-361-297), on behalf of the Fredon entities. References to “we”, “us”, “our”, “Fredon” or “the company” are references to any of the Fredon entities.

The purpose of this statement is to outline our approach to minimise the risk of modern slavery in our business operations and supply chain. This statement is made pursuant to The Australian Modern Slavery Act 2018 and relates to the financial year of July 2020 to June 2021.

### Our business

Since our inception in 1968 Fredon has grown to become one of the largest contractors in the construction industry. We are a leading Electrical, HVAC and AV contractor and Service and Maintenance business that is privately owned, with approximately 1,400 team members with operations across Australia and New Zealand. We have 6 offices across Australia, and 1 in New Zealand, we also have site and project offices for our project delivery teams where required.

Fredon is proud of our industry reputation and our trusted partnerships with our clients. We have our people and performance to thank for getting us to this well-respected position. We understand that the importance of respecting and improving human rights is critical to this continued success.

### Our structure, operations and supply chain

As noted above, this statement covers Fredon and our related entities. Below, those entities and their operations, and the details of their associated supply chain, are noted.

Area	Main operations	Supply chain
<b>Fredon Industries Pty Ltd (Parent company)</b>	<ul style="list-style-type: none"> <li>• Provide electrical contracting solutions to the construction industry.</li> <li>• Provide servicing and maintenance of electrical assets.</li> <li>• Support services (Finance, IT, HR, HSEQ, Procurement, Marketing, Commercial).</li> </ul>	<ul style="list-style-type: none"> <li>• Electrical equipment and materials for installation, service &amp; maintenance work.</li> <li>• Office consumables.</li> <li>• Technology (hardware and software).</li> <li>• Uniforms and PPE attire.</li> <li>• Labour hire and Subcontractors that perform work for us on projects.</li> </ul>
<b>Infrastructure</b>		
<b>Fredon Infrastructure Pty Ltd</b>	<ul style="list-style-type: none"> <li>• Provide electrical contracting solutions for infrastructure projects</li> </ul>	<ul style="list-style-type: none"> <li>• Electrical equipment and materials for installation, service &amp; maintenance work.</li> <li>• Technology (hardware and software).</li> <li>• Uniforms and PPE attire.</li> <li>• Labour hire and Subcontractors that perform work for us on projects.</li> </ul>
<b>Electrical</b>		
<b>Fredon (VIC) Electrical Pty Ltd</b> <b>Fredon (WA) Electrical Pty Ltd</b> <b>Fredon Qld Pty Ltd</b> <b>Fredon ACT Pty Ltd</b>	<ul style="list-style-type: none"> <li>• Provide electrical contracting solutions to the construction industry.</li> <li>• Provide servicing and maintenance of electrical assets.</li> </ul>	<ul style="list-style-type: none"> <li>• Electrical equipment and materials for installation, service &amp; maintenance work.</li> <li>• Office consumables.</li> <li>• Labour hire and Subcontractors that perform work for us on projects.</li> </ul>

HVAC		
<p>Fredon AIR Pty Ltd</p> <p>Fredon AIR (NSW) Pty Ltd</p> <p>Fredon AIR (VIC) Pty Ltd</p> <p>Fredon AIR (WA) Pty Ltd</p> <p>Fredon AIR Service Pty Ltd</p>	<ul style="list-style-type: none"> <li>• Provide HVAC (Heating, ventilation and cooling) contracting solutions to the construction industry.</li> <li>• Provide servicing and maintenance of HVAC assets.</li> </ul>	<ul style="list-style-type: none"> <li>• HVAC equipment and materials for installation, service &amp; maintenance work.</li> <li>• Office consumables.</li> <li>• Labour hire and subcontractors that perform work for us on projects</li> </ul>
AV (Technology)		
<p>Fredon Technology Pty Ltd</p> <p>Fredon Technology (VIC) Pty Ltd</p>	<ul style="list-style-type: none"> <li>• Provide AV contracting solutions to the construction industry.</li> <li>• Provide servicing and maintenance of AV assets.</li> </ul>	<ul style="list-style-type: none"> <li>• AV equipment and materials for installation, service &amp; maintenance work.</li> <li>• Office consumables.</li> <li>• Labour hire and subcontractors that perform works for us on projects.</li> </ul>

## Risk management and due diligence

Fredon does not tolerate slavery, human trafficking, forced or child labour or child exploitation. We have several policies and processes that demonstrate our approach to identifying and addressing modern slavery risks in our operations. These include:

- Speak Up Policy and program (Whistleblower)
- Supplier/Subcontractor Code of Conduct
- Code of conduct
- Workplace grievance policy
- Workplace Anti-Bullying and Anti-Harassment policy
- New Supplier/Subcontractor Form (online onboarding submission process).

Following an assessment of our operations and supply chain, identified risks are being removed or mitigated via a range of methods including:

- Only approved Suppliers can be engaged to provide goods/services to Fredon Industries.
- An approval process for our Suppliers is in place to ensure only suitably qualified and experienced organisations are engaged.
- All approved Suppliers must complete and submit a declaration of their compliance to the Modern Slavery Act prior to engagement.

## Measuring effectiveness

Due diligence within our subcontractor and supplier pre-qualification and onboarding processes provide us with a mechanism to identify modern slavery risks within our supply chain and therefore contributes to measuring our effectiveness in relation to modern slavery.

In addition, by remaining vigilant capturing and reporting on modern slavery occurrences minimises the risk of modern slavery within our business.

The effectiveness of our processes demonstrates our performance in this area.



## Consultation

Fredon Industries Pty Ltd, as the reporting entity under this statement consulted with each of the entities that it owns or controls and that are described in the table set out in the “Our structure, operations and supply chains” section. This process of consultation occurred by our compliance officer contacting each of the Managing Directors of the entities in Fredon.

## Future Actions

Over the next financial year, our key aims will be to:

- Remain vigilant to any occurrences of modern slavery by capturing any reported incidents of modern slavery within Fredon’s supply chain and investigate;
- We will capture and address any reported change to the risk profile of our suppliers in relation to modern slavery, as required by our Supplier/Subcontractor code of conduct;
- Continue our engagement with our suppliers and subcontractors in regard to their compliance with the Modern Slavery Act and conduct formal reviews of our suppliers and subcontractors
- Ongoing monitoring of internal policies and procedures for managing risks of modern slavery practices throughout our supply chain and assessing the effectiveness of our risk control strategy and associated operational procedures.
- We will look for opportunities to improve our performance when measuring the effectiveness of our actions in relation to modern slavery;
- Continue to facilitate appropriate modern slavery awareness training sessions to relevant team members; and
- Produce and publish our next ‘Modern Slavery Statement’ for the 2021/2022 reporting period in accordance with statutory obligations.

## Approval

The Fredon board has approved this document and it is signed by the Fredon CEO on behalf of Fredon.



**Scott Olsen**  
CEO  
Fredon Industries Pty Ltd