



## Interflow Modern Slavery Act Statement

Interflow is a leading provider of pipeline infrastructure, developing innovative solutions to extend the operational life of water networks across Australia and New Zealand.

The Company's services span the planning, design, construction and maintenance spaces, developing a customised approach to achieve the most sustainable outcomes for its customers and communities.

Founded on its core values of Honesty, Reliability and Competence, the company's rich heritage of innovation continues to spearhead the market, paving the way for a bright future ahead.

Governed by these core values, the company is committed to respecting human rights in its operations and supply chain. Interflow takes a zero-tolerance approach to forced labour, slavery and human trafficking in any form.

This Modern Slavery statement is made in accordance with the *Australian Modern Slavery Act 2018 (Cth)* and is submitted as a joint statement on behalf of the following reporting entities, together "Interflow":

- Interflow Holdings Pty Ltd
- Interflow Pty Ltd
- Interflow Resources Pty Ltd

This Modern Slavery statement was approved by Interflow's principal governing body in December 2020.

### Interflow's structure, operations and supply chain

Interflow is a privately owned business based in Girraween, New South Wales, with regional offices across Australia and New Zealand.

#### *Interflow's Governance*

The Interflow Executive Team is responsible for managing business risks and opportunities of each of the reporting entities included in this statement, with the assistance of the Senior Leadership Team, including Regional Based General Managers.

The identification and management of risk at an enterprise level is performed in accordance with the organisation's enterprise risk management process. Interflow's enterprise risk register is the central document that outlines identified risks and the relevant mitigation strategies, including but not limited to risks related to Modern Slavery.

#### *Interflow's Suppliers*

Interflow does not own or operate factories; instead, engaging third party suppliers to manufacture, produce and/or provide products. The company's procurement strategy focuses on partnering with established local suppliers to support its regional operations, benefiting the local communities it serves. Interflow's supply chain consists of predominantly locally sourced products (98%) with a small percentage of direct international suppliers (2%).



### Interflow's due diligence process

Interflow has adopted a risk-based approach to modern slavery, concluding that the overall risk is low. This is due to the majority of suppliers (98%) being based in Australia for both manufacturing and services, and the majority of work (98%) being self-performed by Interflow employees.

### COVID -19

During FY21, the company further enhanced its supplier risk assessment processes due to the heightened supply chain risk associated with the global pandemic.

## Risks of modern slavery practices

Interflow has assessed the modern slavery risk in its operations and supply chain as low.

### Interflow's Operations

The Interflow workforce comprises field employees covered by an Enterprise Bargaining Agreement (64%), with the remaining employees (36%) being employed under individual employee contracts. These agreements reflect at least minimum pay and entitlements in accordance with relevant legislation throughout Australia and New Zealand.

Other human rights considerations at Interflow include equality, fair pay, anti-discrimination and safety. While these are not direct modern slavery risks, they can potentially affect labour rights.

Safety is a primary focus at Interflow, where the organisation works to ensure its employees remain safe in a supportive and inclusive environment. This is led by the Health, Safety & Environment (HSE) team, in conjunction with the company's Business Partners and regional Operations Teams, supported by a [Harm 2 Zero \(H20\)](#) safety strategy.

### Interflow's Supply Chain

The primary modern slavery risk throughout the supply chain has been identified as third party suppliers not complying with Interflow's labour standards.

Interflow's modern slavery risk primarily relates to:

#### 1. Direct supply:

Location	Proportion	Risk rating	Risk	Example of product/service
Australia	98%	Low	Labour exploitation	Subcontractors
International	2%	Low	Labour exploitation	

#### 2. Indirect supply

There is an increased risk of modern slavery in downstream suppliers, where Interflow has less visibility due to the lack of a direct relationship. Interflow has identified some product/s that carry modern slavery risk in its supply chain, including information technology and peripherals as well as personal protective equipment. The representation of these categories in its supply chain is approximately 1% of total spend supporting our overall modern slavery risk as low.

## Actions taken to address key identified modern slavery risks

### *Supplier selection*

Interflow has incorporated the following items to mitigate the risk of modern slavery throughout the supply chain:

- modern slavery requirements embedded into supplier onboarding processes;
- modern slavery standards and expectations embedded into key supplier agreements, including minimum reporting requirements.

### *Supplier evidence*

Interflow has taken a risk-based approach whilst also including suppliers with significant spend when obtaining evidence of compliance with modern slavery requirements as set out below:

#### Local Organisations with turnover > \$100 million

- Obtaining a copy of the modern slavery statement for direct and indirect suppliers where available;
- Obtaining evidence of the supplier's review of their supply chain compliance, including manufacturing facilities where applicable (i.e. Interflow's indirect supply).

#### Local Organisations with turnover < \$100 million

- Obtaining confirmation that the supplier ethically sources products and services.

#### International Organisations

- Obtaining a copy of the supplier's modern slavery statement equivalent for their jurisdiction for direct and indirect suppliers (e.g. information technology & peripherals).

## Assessing the effectiveness of actions being taken to address modern slavery risks

### *Stakeholder engagement and expectations*

Interflow is working closely with customers, including government authorities, to understand and align with industry expectations regarding modern slavery risks.

### *Industry practices in modern slavery compliance*

Interflow benchmarks adopted modern slavery actions against organisations in the same or similar industries, to continuously improve the approach taken to modern slavery risks, including mitigation strategies.

### *Commitment for the next 12 months*

1. Supply chain mapping and risk assessment, to aid in the understanding of supply chain risks;
2. Enhancement of the social procurement policy and procedures;
3. Continuous improvement of policies, systems and controls, including benchmarking against stakeholder and industry information, as they relate to modern slavery risks.

Interflow is committed to continue to identify and mitigate modern slavery risks throughout operations including its supply chain.

Signed:



Signed Date: 16/12/2020

Name: Geoff Weaver  
Title: Managing Director

Review Date: 16/12/2021