



# MODERN SLAVERY STATEMENT

---

2022/2023

**FREDON**

# TABLE OF CONTENTS

---

- 01** ABOUT THIS STATEMENT
- 02** CEO MESSAGE
- 03** WHO WE ARE
- 04** OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN
- 05** MODERN SLAVERY RISK IN OUR OPERATIONS AND SUPPLY CHAIN
- 06** ACTIONS WE HAVE TAKEN TO ADDRESS MODERN SLAVERY RISK



- 07** FUTURE ACTION PLAN
- 08** ASSESSING THE EFFECTIVENESS OF OUR ACTIONS
- 09** REMEDIATION PROCESS
- 10** CONSULTATION PROCESS



01

# ABOUT THIS STATEMENT

---

Fredon Industries Pty Ltd (ABN: 12-003-361-297), submits this statement pursuant to the Australian Modern Slavery Act 2018 on behalf of Fredon entities. References to “we”, “us”, “Fredon” or “the Company” are references to any of the Fredon entities.

This statement outlines our approach to minimise the risk of modern slavery in our business supply chain and operations during the reporting period from July 2022 – June 2023.

02

# CEO MESSAGE

---



**Scott Olsen, Chief Executive Officer**

We are honoured to present our company's commitment to combatting modern slavery in our Annual Modern Slavery Statement. At Fredon, we firmly believe that the fight against modern slavery is not just a responsibility, but a moral imperative. We are dedicated to upholding the highest ethical standards in our operations and throughout our supply chain.

Modern Slavery is a grave and deeply concerning issue that continues to persist in many corners of the world. It is an affront to our minds.

As the CEO of Fredon, I want to make it unequivocally clear that I am committed to eradicating Modern Slavery in all its forms within our organisation and throughout our supply chain.

I recognise that Modern Slavery is a complex problem that demands a multifaceted response. Our commitment is enriched in our fundamental belief that every individual, regardless of their background or circumstances, deserves to live a life free from exploitation and coercion.

In an effort to reduce Modern Slavery risk within our supply chain, a key focus during this reporting period has been to liaise with our suppliers to gain a deeper understanding of their Modern Slavery practices and policies.

Fundamentally, in this Annual Modern Slavery Report you will find a detailed account of our efforts, progress, and future plans to combat modern slavery. We recognise that this is a journey, not a destination, and we remain committed to continuous improvement.

This Statement has been approved by the Fredon Board and signed by Scott Olsen, Chief Executive Officer, on behalf of the Fredon Board on 18 December 2023.

Sincerely,

A handwritten signature in black ink that reads "Scott Olsen". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

**Scott Olsen**  
Chief Executive Officer  
18/12/2023

# WHO WE ARE

Fredon Group is a leading provider of Electrical & Communications, HVAC (Heating/Ventilation/Air Conditioning), Security, Technology Services and Services and Maintenance.

- Engineering/design
- Delivery of large construction projects
- Client services/special projects
- Technology and security integration
- Scheduled preventative maintenance
- Building services integration and off-site prefabrication
- Industrial and Infrastructure projects



**1968**

Established



**Privately**

Owned



**1700+**

Staff



**\$750M**

Turnover

We provide services to a wide range of clients in sectors including commercial, government, defence, health and aged care, industrial, mining and resources, infrastructure and education. Our track record of major projects, innovation and numerous industry awards demonstrates that we offer industry leading project management and technical expertise.

Fredon is 100% Australian owned and operated and has delivery capabilities Australia wide and in New Zealand.

Our core capabilities include a wide range of services that can be delivered on a design & construct, construct only or full turn-key basis to cover the facilities lifecycle.

We have upheld an enviable reputation, boasting high-quality workmanship, value for money, outstanding safety performance and outstanding client satisfaction. Our WHS, Quality Assurance, Procurement and Project Management systems have been developed to ensure scalability to the highest standards and most complex requirements.

Our parent company, Fredon Industries Pty Ltd has 16 reporting entities. During the reporting period, Sturdie Trade Services Pty Ltd was acquired by Fredon in December 2022 and have been included in this report.

## OFFICE LOCATIONS

FREDON HAS 8 OFFICES ACROSS AUSTRALIA AND 1 IN NEW ZEALAND



### NSW

SILVERWATER (HEAD OFFICE)

### VIC

FAIRFIELD  
HEATHERTON  
FOOTSCRAY

### WA

BAYSWATER

### ACT

FYSHWICK

### QLD

UNDERWOOD

### SA

TORRENSVILLE

### NEW ZEALAND

AUCKLAND

---

## VALUES

We promote the following values across our business and encourage our employee to conduct themselves in alignment with our values.



### Excellence

In design, delivery & service



### Innovation

Through design, education & sustainability



### Integrity

In everything we do



### People

Empowered to perform

# OUR STRUCTURE

## OPERATIONS & SUPPLY CHAIN

---

### ENTITIES

#### **Fredon Group covers 3 brands and 17 entities:**

- Fredon Industries Pty Ltd (Parent Company)
- Fredon Infrastructure Pty Ltd
- Fredon (VIC) Electrical Pty Ltd
- Fredon (WA) Electrical Pty Ltd
- Fredon QLD Pty Ltd
- Fredon ACT Pty Ltd
- Fredon AIR Pty Ltd
- Fredon AIR (NSW) Pty Ltd
- Fredon AIR (VIC) Pty Ltd
- Fredon AIR (WA) Pty Ltd
- Fredon AIR Service Pty Ltd
- Fredon Technology Pty Ltd
- Fredon Technology (VIC) Pty Ltd
- Aserve Queensland Pty Ltd
- Aserve Victoria Pty Ltd
- Aserve Technology (VIC) Pty Ltd
- Sturdie Trade Services Pty Ltd

### MAIN OPERATIONS

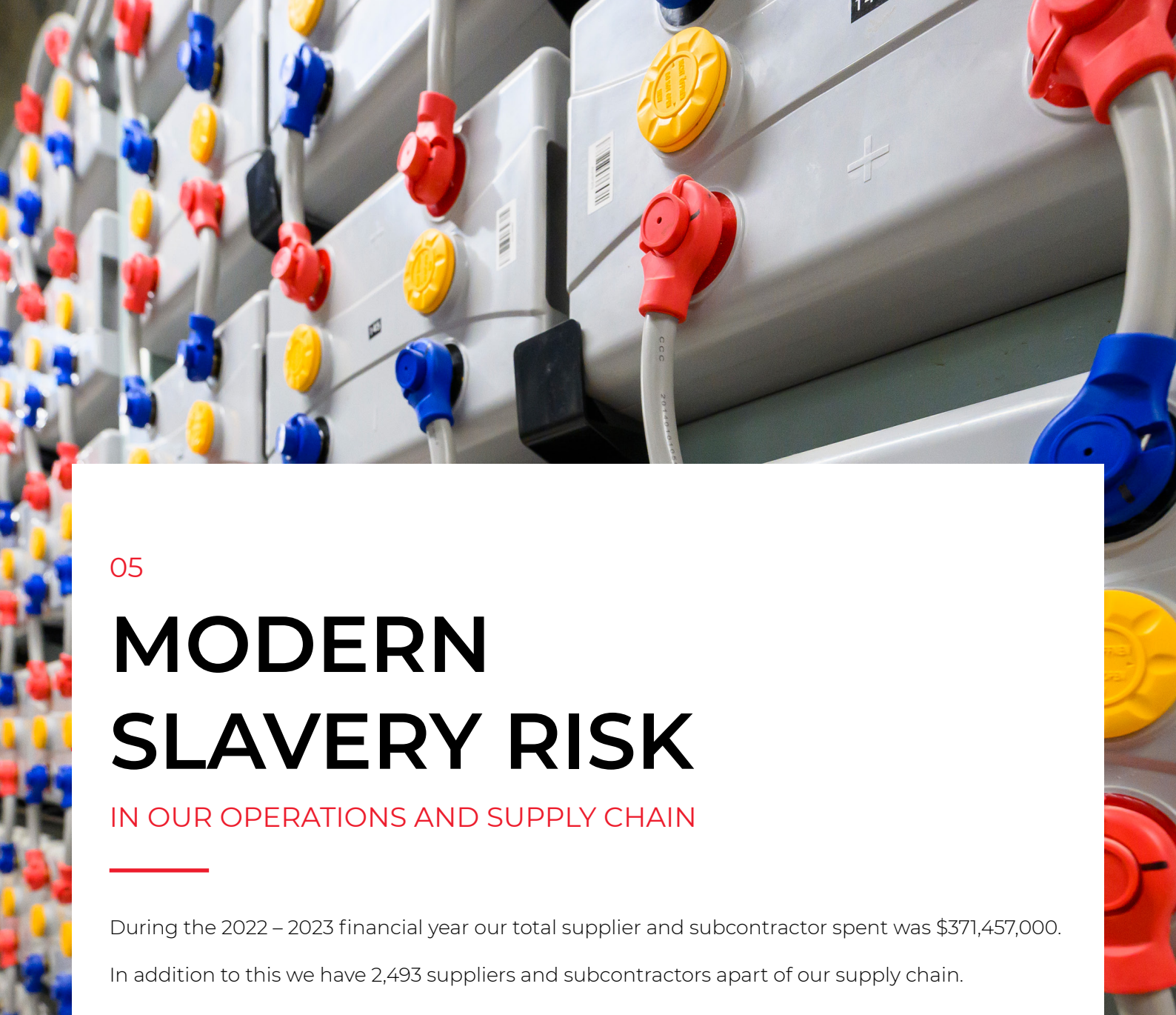
#### **Fredon has over 1,700 employees nationally, with our operations covering:**

- Providing electrical and HVAC contracting solutions to the construction industry.
- Providing servicing and maintenance of electrical, HVAC and AV assets.
- Supporting Services (Finance, IT, HR, HSEQ, Procurement, Marketing, Commercial).
- Providing electrical contracting solutions for infrastructure projects
- Providing AV and security contracting solutions.
- Providing customised and preventative maintenance.
- Providing electrical contracting for minor construction and fit outs.
- Providing AV contracting solutions for service, maintenance and fit outs.

### SUPPLY CHAIN

#### **Our supply chain incorporates:**

- Electrical equipment and materials for installation, service and maintenance work
- Office consumables
- Technology (hardware and software)
- Uniforms and PPE attire.
- Labour hire and subcontractors who perform work for us on projects.
- Recruitment agencies
- HVAC, AV and security equipment and materials for installation, service and maintenance work.
- Installations, service and maintenance work.



05

# MODERN SLAVERY RISK

IN OUR OPERATIONS AND SUPPLY CHAIN

---

During the 2022 – 2023 financial year our total supplier and subcontractor spent was \$371,457,000. In addition to this we have 2,493 suppliers and subcontractors apart of our supply chain.

Our supply chain sources supply globally. We acknowledge that the geographical locations of certain suppliers within this chain could potentially amplify the risk of Modern Slavery. Notably, materials procured from China have been pinpointed as having a heightened likelihood of Modern Slavery associated production risks. We are aware of the limited transparency we possess in certain international markets, which consequently arguments the potential for Modern Slavery risks, particularly within the secondary tiers of our supply chain.

In addition to this, we recognise areas of vulnerability within our operations may arise as a result of outsourcing services such as cleaning and labour hire contractors. We acknowledge that we do not have full transparency of our supply chain however, we are actively engaging with our suppliers and subcontractors to communicate our expectations as well as implementing processes and procedures to minimise risk within the supply chain.



# ADDRESS MODERN SLAVERY RISK

## RISK MANAGEMENT & DUE DILIGENCE

Fredon recognises the importance of mitigating, identifying and addressing risk in our operations and supply chain. We have implemented a range of risk management approaches to minimise modern slavery risk and to ensure we are meeting our due diligence.

## OUR POLICIES AND PROCEDURES

Fredon does not tolerate slavery, human trafficking, forced child labour or child exploitation. We have several policies and procedures that demonstrate our approach to identifying and addressing modern slavery risk in our operations. We are constantly reviewing our policies and procedures to ensure alignment legislative requirements.

These include:

### 1. SPEAK UP POLICY (WHISTLE-BLOWER)

Our Speak Up Policy outlines the importance of ethical behaviour and conduct. It informs our employees on the procedure they may undertake to report suspected unethical, illegal, fraudulent or undesirable conduct under the protection and support of Fredon. We have engaged an external, third-party reporting service for reporting purposes. Our Employees can contact them 24 hours a day / 7 days a week.

### 2. SUPPLIER & SUBCONTRACTOR CODE OF CONDUCT

Our Supplier and Subcontractor Code of Conduct outlines our expectations that our suppliers and subcontractors must make good ethical decisions. We expect our suppliers and subcontractors to operate in compliant with relevant laws, regulations and have a working environment that is free of prejudice. Our suppliers and subcontractors are required to sign a declaration of compliance in agreement to our Supplier and Subcontractor Code of Conduct.

### 3. CODE OF CONDUCT

Our Code of Conduct defines Fredon's expectations in relation to behaviour and conduct within the workplace. This policy applies to all employees who performs work for or with Fredon including, full-time, part-time and casual employees, directors, apprentices' employees via a registered training organisation and contractors e.g., consultants.

#### 4. WORKPLACE GRIEVANCE POLICY

Fredon endeavours to provide an inclusive, safe and fair working environment for all employees, ensuring that employees have access to a process that supports resolution as promptly and effectively as possible. Our Workplace Grievance Policy aims to provide guidance to our employees on the process of workplace grievance. We use this policy to aim to achieve equality, fairness and consistency in our approach when handling workplace grievances.

#### 5. WORKPLACE ANTI-BULLYING AND ANTI-HARASSMENT POLICY

Fredon have a zero-tolerance approach to workplace bullying and harassment. We are committed to taking all reasonable steps to prevent inappropriate or illegal working behaviour. Our Workplace Anti-bullying and Anti-Harassment Policy encourages and supports positive workplace behaviours that aim to ensure Fredon's workplaces are free from any forms of workplace bullying, harassment or violence and promote an environment of mutual respect, personal dignity and support.

#### 6. MODERN SLAVERY (ANTI-SLAVERY AND ANTI-HUMAN TRAFFICKING) POLICY

Modern Slavery (Anti-Slavery and Anti-Human Trafficking) Policy Our Modern Slavery (Anti-Slavery and Anti-Human Trafficking) policy demonstrates Fredon's commitment to ensuring we meet our obligations and remain compliant with the Modern Slavery Act 2018 (Cth).

### EXTERNAL THIRD-PARTY REPORTING SERVICE

As mentioned above, we have engaged a third-party provider to provide Fredon employees with an external reporting service. This service is available 24 hours, 7 days a week. It seeks to prioritise confidentiality and allows reports to be made anonymously.

### NEW SUPPLIER AND SUBCONTRACTOR ONBOARDING FORM

New Supplier and Subcontractors are required to complete an onboarding form prior to engagement to declare their compliance with all Australian legislation including Modern Slavery.

In addition to this, the New Supplier and Subcontractors form capture important information to ensure prospect suppliers and sub-contractors are operating in alignment with all legislative requirements.

### CONTRACTUAL TERMS

Our supplier and subcontractor contract agreements have a specific clause requiring our Suppliers and Sub-contractors to comply with all Australian legislation including Modern Slavery.

## ONGOING MODERN SLAVERY CHECKS (INFORMAL AUDITS)

During this reporting period, we conducted ongoing Modern Slavery checks (informal audits) on randomly selected suppliers. We contacted these suppliers and requested documentation and information such as policies, procedures and processes to verify actions our suppliers have undertaken to identify, assess and mitigate modern slavery risk within their own supply chain.

At the conclusion of this exercise, no risk of Modern Slavery was identified.

This will be an ongoing measure to gain a further understanding of our supplier's commitment towards Modern Slavery.

Sydney Football Stadium Redevelopment - Electrical Works



# FUTURE ACTION PLAN

---

Fredon is committed to improving our policies, procedures and initiatives to effectively identify, assess and address modern slavery risk.

We have identified two key focus areas with actions we plan to undertake in future reporting periods.



## Supply Chain Risk Identification

We are in the process of developing and implementing a Modern Slavery e-learning module to be included in our employee induction process.

In addition to this, we will be including our Modern Slavery policy in our new employee onboarding documentation pack.

To raise awareness of Modern Slavery, we are sourcing Modern Slavery training to be delivered across the Fredon Group on an annual basis.

---



## Training & Awareness

We will continue to engage with our suppliers and sub-contractors in regards to compliance with the Modern Slavery legislation.

Declarations will be annually re-issued to our suppliers as a continuous effort to identify risk in our supply chain.

---



## 08 ASSESING THE

# EFFECTIVENESS OF OUR ACTIONS

---

We are making an active effort to continuously address Modern Slavery risk across our business.

We are actively overseeing the efficiency of the established processes and procedures designed to mitigate Modern Slavery risks within our operations. In addition to this, we evaluate the impact of our initiatives by meticulously monitoring our actions and their corresponding outcomes. Our approach involves collaboration with both our suppliers and external partners as well as, internal governance mechanisms to ensure the effectiveness of our actions.

Furthermore, to enhance the effectiveness of our response, the outcomes derived from the aforementioned processes will have a direct impact on our future actions. Through this we will adapt and strength our actions to ensure a continuous trajectory of improvement.

09

# REMEDIATION PROCESS

---

Fredon highlights the importance of Modern Slavery through our zero-tolerance approach. In cases where risk is detected within our supply chain, we will report the matter to relevant authorities and collaborate with the supplier to create a corrective action plan with a mutually agreed timeline.

10

# CONSULTATION PROCESS

---

Human Resources, Procurement and Health, Safety, Environment and Quality teams actively participate in overseeing the process and tools that formulate our risk management approach. All Managing Directors of Fredon entities are contacted to engage in discussions and contribute to the Modern Slavery consultation process. This consultative approach serves to enhance our risk management practices and elicit valuable insights, fostering an ongoing process of improvement and advancements in our approach.