

MODERN SLAVERY STATEMENT

FINANCIAL YEAR 2021





OUR COMMITMENT

Richard Crookes Constructions (RCC) is committed to limiting the risk of modern slavery occurring within its own business, in its supply chains or through any other business relationship.

Modern Slavery can take many forms but fundamentally is a range of exploitive practices including human trafficking, slavery, forced labour and child labour all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

As part of its ongoing commitment the Company will comply with all applicable Australian and International slavery legislation including the Modern Slavery Act 2018 (Cth) and the Modern Slavery Act 2018 (NSW).

RCC does not tolerate modern slavery and will not knowingly engage in or partner with consultants, subcontractors or suppliers that engage in modern slavery.

1.0 REPORTING ENTITY IDENTITY & CONSULTATION PROCESS

This modern slavery statement has been prepared as a joint statement on behalf of the Richard Crookes Constructions Group of companies.

This joint statement has been prepared for RC&LC Holdings Limited (ABN 41 105 030 117) and its wholly owned subsidiary Richard Crookes Constructions Pty Limited (ABN 33 001 375 266). The group of companies is collectively referred to as 'RCC'.

Our company secretaries for both entities have collectively worked together to prepare this joint statement.

2.0 REPORTING ENTITY STRUCTURE, OPERATIONS AND SUPPLY CHAIN

RCC is a private, family-owned design and construction management business that has been building for government and private clients since 1976. Our business is based on maintaining long-term relationships with clients, partners and subcontractors.



OPERATIONS

RCC's registered office (and head office) is located at Level 3, 4 Broadcast Way, Artarmon NSW. With our original and head office in Sydney, we provide localised client service with offices in Newcastle, Canberra, Tamworth and Brisbane.



Our people are the cornerstone of everything we do. With approximately 740 direct employees, our teams enable us to deliver over 55 projects concurrently across multiple sectors.

RCC's strength is our diversity within sectors, project size, delivery form, location and building type. Our operations are split across seven strategic business units, based on sector and geography, with each business unit led by a General Manager.

The company's corporate operations (excluding staff costs) represents a very small percentage of the total business-wide procurement. The vast majority (>98%) of RCC procurement relates to project spend, via engagement with subcontractors and suppliers.

RCC'S FIVE COMPANY VALUES:



A personalised service with a collaborative, open and honest approach.

RCC always put our clients' needs and interests first.



RCC has a strong culture based on the Crookes family values: open, honest, fair, respectful, collaborative and hard working.



Complete confidence the project will be delivered as promised on time, and budget, safely and to the highest quality.



Committed to protecting ourselves, our colleagues, clients and visitors to ensure the safety of their future, health, family, friends and the surrounding environment.



We deliver on our promises.

Being a confident and reliable builder and providing a great service is what we are about.

SUPPLY CHAIN

RCC is heavily reliant on the use of subcontractors and suppliers.

We have engaged over 4,400 direct subcontractors / suppliers on our construction projects during the FY21 reporting period, with an annual spend of circa \$1.55b.

On any given day, across our 50+ active projects, there are approximately 7,000 workers on site, 700 RCC direct employees and 6,300 employees / contractors or subcontractors.

We engage with Australian based subcontractors and suppliers, many of whom source materials from overseas sources, namely China, Malaysia and Europe (Italy, Turkey, Spain, France and Germany).

3.0 MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

During the FY21 period, RCC undertook a modern slavery risk assessment of our operations and supply chain.



For the risk assessment, project-based spend was split across 22 procurement categories.

RCC's spend was screened with five information sources (databases and literature) to provide a likelihood of modern slavery risk for each procurement category.

Each source of information resulted in a score. All scores were then combined to provide an overall rating based on all five information sources.

The assessment identified the following as the key modern slavery risks within RCC's operations and supply chain:

- Underpayment, indentured workers and exploitation of migrants in construction, trades or labour hire;
- Labour conditions and child labour in the supply chain of building and mechanical products and materials;
- Labour conditions and child labour in the supply chain of manufactured goods, such as furniture, hardware and fittings



The following table summarises the key types of modern slavery risk and where they may most likely exist within our operations and supply chain:

RISK PROXIMITY	PRODUCTS / SERVICES	KEY ISSUES
Direct (onshore and on-site activities)	Construction activities	Labour rights in construction activities including labour hire.
Supply Chain	Mechanical & Equipment	Labour rights and health and safety in overseas supply chains of parts, equipment and components and other manufactured goods including the production of metal products.
	Construction Materials	Labour rights, health and safety and human rights and governance in the overseas supply chain of building materials such as timber, plastic, glass, cement, metals, paint, textiles, ceramics, brick, sand, clay, stones, gravel, gypsum, brassware, and iron.
	Electronics	Labour rights and health and safety in electronics supply chains.



4.0 ACTIONS TAKEN TO ASSESS AND ADDRESS OUR MODERN SLAVERY RISKS

OUR ACTIONS

Our focus during the second reporting period was to further enhance our modern slavery framework and provide / commence both internal and external awareness training.

Key actions undertaken include:

1. RISK ASSESSMENT & ACTION PLANNING

- Undertook a Modern Slavery Risk Assessment of RCC's operations and supply chain (as noted in criterion 3)
- Held workshop with external advisor to review results of the risk assessment and discuss an ongoing action plan
- Established a Modern Slavery questionnaire (for subcontractors and suppliers). The questionnaire contained eight questions and provided links to relevant modern slavery educational resources.

2. PURPOSE OF QUESTIONNAIRE

We issued the Modern Slavery questionnaire to a select sample of suppliers and subcontractors who were operating in high-risk trades. The questionnaire is designed to assist RCC and our suppliers / subcontractors to:

- Identify and assess possible modern slavery risks in RCC procurements.
- Identify mitigation efforts to combat the risk of modern slavery in RCC procurements, and
- Foster collaboration between RCC and their suppliers to address these risks.

3. EDUCATION, TRAINING AND AWARENESS

- Provided internal training to all commercial administrators and managers

4. LEGALS, POLICY AND PROCEDURES

- Linked Supplier Code of Conduct into key subcontractor agreements and processes, namely Subcontractor agreement and Subcontractor Prequalification questionnaire

5.0 ASSESSING OUR EFFECTIVENESS OF ACTIONS TAKEN

We regularly monitor the effectiveness of our framework, policies and processes used in relation to modern slavery risks, through the following means:

- Supplier interviews – conducting interviews with selected suppliers / subcontractors to review in more detail their responses to our modern slavery questionnaire
- Employee Communication and training
- Governance review – administering an annual review of our key policies and procedures

6.0 OTHER RELEVANT INFORMATION

NEXT STEPS

RCC is committed to the following actions during the FY22 reporting period:

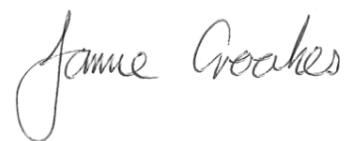
- **Training and Awareness:** Providing more detailed Modern Slavery training to all staff
- **Vertical mapping of supply chain:** Selecting up to five suppliers in deemed high-risk trades and undertaking a detailed vertical mapping exercise of that individual trade supply chain

EXTERNAL ENGAGEMENT

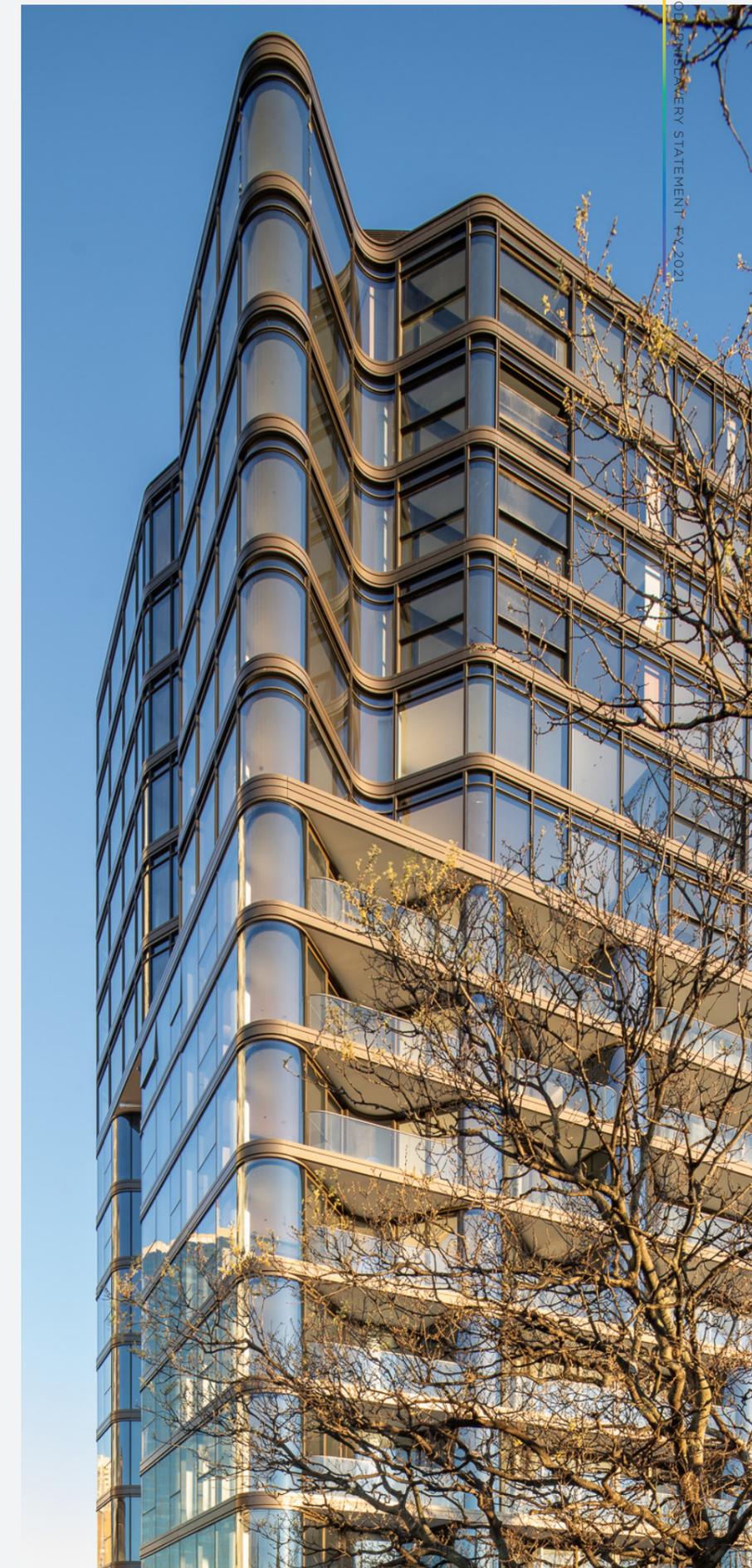
During the FY21 period, we updated our Property Council of Australia 'Supplier Assessment Questionnaire.'

Our team members also met with key clients to update them on our modern slavery action plan.

This statement was approved by the Board of Directors of Richard Crookes Constructions Pty Limited on 21st December 2021.



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