



# MODERN SLAVERY STATEMENT

FINANCIAL YEAR 2020



## 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

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). This group of companies is collectively referred to as 'RCC'.

The company secretaries for both entities have collectively worked together to prepare the joint statement

## 2.0 REPORTING ENTITY STRUCTURE, OPERATIONS AND SUPPLY CHAIN

RCC is a private, family-owned construction company 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 Tamworth, Newcastle, Brisbane and Canberra.

Our teams are the cornerstone of everything we do here at RCC. With 700 passionate and dedicated staff, our personnel's depth of experience enables the company to deliver over 55 projects at any one time across all major industry sectors.

Being multi-skilled and diversified across project size, delivery form, building type, and location allows us to tailor our service to suit our client's specific requirements, risk preferences, priorities and concerns.

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

### SUPPLY CHAIN

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

RCC had over 2,000 direct subcontractors / suppliers engaged on its construction projects during the FY20 reporting period.

On any given day, across RCC's 50 active projects, there are approximately 7,000 workers on site, 700 RCC direct employees and 6,300 subcontractors or suppliers.

For our risk review we have split our project based spend across 22 procurement categories. Our top spend areas by procurement category were Structure (32%) and Services (25%).

RCC engages with Australian based subcontractors and suppliers, many of whom source materials from overseas sources, namely China and Europe.



**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.



### 3.0 MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

Globally 18% of modern slavery victims are found in the Construction Industry, making it a high risk industry.

Common modern slavery risks in construction are:

- Forced or unpaid labour
- Child Labour
- Unsafe conditions
- Debt bondage

The drivers of the high victim rate are:

- High demand for low skilled labour
- Poor visibility over supply chain - due to outsourcing
- Materials being sourced from high risk geographies

RCC, with the assistance of an external specialist, is undertaking a detailed risk assessment of its operations and supply chain in FY21.

### 4.0 ACTIONS TAKEN TO ASSESS AND ADDRESS OUR MODERN SLAVERY RISKS

During the reporting period RCC's priorities were to better understand the modern slavery risks within our operations and supply chain and establish a framework to ensure that modern slavery is considered in all our operational and supply chain relationships.

Key actions undertaken include:

- High level Modern Slavery action plan developed summarizing the key areas of focus, the focus areas for the next 1 to 2 years, and the intended outcomes of each action. The action plan is a fluid document that is progressively updated and revised.
- Briefing paper presented to the Board of Directors by our external lawyers in regard to Modern Slavery
- Company Modern Slavery Policy finalised and signed off by the RCC Board. This policy has been communicated to staff and is available on our Intranet. It has also been provided to clients upon request.
- Supplier Code of Conduct developed and implemented. The code sets out our expectations of our subcontractors and suppliers on a number of issues including:
  - Labour and Human Rights
  - Modern Slavery
  - Health and Safety
- Legal review undertaken on other relevant policies and contracts
  - Employee Code of Conduct
  - Subcontract Agreement
  - Employment Contract
- Subcontract Agreement updated to address modern slavery risk and adherence to the Supplier Code of Conduct.
- Whistleblower Policy developed

In addition to the above, a modern slavery working group was established with a number of other business peers within the construction industry. The purpose of the group is to improve our understanding of the risks and discuss options for possible industry wide initiatives.

## 5.0 ASSESSING OUR EFFECTIVENESS OF ACTIONS TAKEN

As this is the first reporting period for Modern Slavery, RCC's focus has been around education and awareness, and establishing a framework and action plan to ensure continuous improvement.

Managing the risk and assessing the effectiveness of RCC's actions, requires ongoing commitment and collaboration with our suppliers and the industry. To manage this an internal Modern Slavery Working Group has been created. The working group comprises the following roles:

- Chief Financial Officer
- General Manager – Commercial and Risk
- Business Systems Manager
- Sustainability Manager

## 6.0 OTHER RELEVANT INFORMATION

### NEXT STEPS

RCC is committed to the following actions during the FY21 reporting period:

- Risk Assessment – undertake a detailed risk assessment of our operations and supply chain; review results and agree a plan to monitor and mitigate key risks
- Due Diligence – implement further due diligence by amending our subcontractor screening and interview process (at the time of tender to include questions around modern slavery risk and compliance).
- Training and Awareness – roll out of an internal Modern Slavery training program to all staff

### EXTERNAL ENGAGEMENT

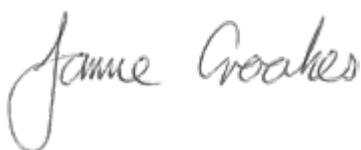
During the period RCC completed the comprehensive Property Council of Australia 'Supplier Assessment Questionnaire.'

### COVID-19 IMPACTS

RCC was impacted by the effects of covid-19 during the last 5 months of the reporting period. The key impacts being:

- Establishing new supply chains to source appropriate personal protective equipment, sanitizing products and cleaning chemicals.
- Maintaining strong communication links to all of the on-site supply chain to ensure consistent health protocols were followed by all workers on site

This statement was approved by the Board of Directors of Richard Crookes Constructions Pty Limited on 8th March 2021



**JAMIE CROOKES**  
**MANAGING DIRECTOR**



## SYDNEY

LEVEL 3, 4 BROADCAST WAY  
ARTARMON NSW 2064

PO BOX 1024  
CROWS NEST NSW 1585

PHONE: 02 9902 4700  
FAX: 02 9439 1114

---

## NEWCASTLE

LEVEL 1, 118A BELFORD STREET  
BROADMEADOW NSW 2292

PHONE: 02 4952 6777

---

## TAMWORTH

SUITE 1, 493 PEEL STREET  
TAMWORTH NSW 2340

PHONE: 02 6766 5225

---

## CANBERRA

UNIT 1, 155 NEWCASTLE STREET  
FYSHWICK ACT 2609

PO BOX 771  
FYSHWICK ACT 2609

PHONE: 02 6143 2900

---

## BRISBANE

LEVEL 26, 1 EAGLE STREET  
BRISBANE QLD 4000

GPO BOX 1497  
BRISBANE QLD 4001

PHONE: 07 3099 0899

