

Modern Slavery Statement - 2022

INTRODUCTION

Insurance Building Australia Holdings Pty Ltd (ACN 661 804 879) (**Insurance Building Australia Holdings**) is the ultimate parent company and 100% owner of Ambrose Construct Group Pty Ltd (ACN 661 832 140) (**Ambrose**) and Inserve Australia Ltd (ACN 147 747 859) (**Inserve**).

Ambrose and Inserve operate in the same sector, have similar operations and have many shared suppliers and provide this statement jointly to satisfy both entities' reporting obligations under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**). In accordance with the *Modern Slavery Act 2018* (Cth) and associated guidelines, this statement sets out a consolidated description of the steps that both Ambrose and Inserve (collectively, **the Group**) have taken, and are continuing to take, to assess and reduce risks of modern slavery within the Group's business and supply chain, and plans for review and improvement.

This modern slavery statement has been approved by the board of directors of Insurance Building Australia Holdings on behalf of the Group.

Purpose

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

The Group is opposed to slavery in all its forms, including human trafficking, slavery, servitude, forced labour, deceptive recruiting for labour or services, debt bondage, forced marriage and unlawful child labour. The Group is committed to promoting ethical business practices and policies that protect workers from being abused and exploited, both within our own business and our supply chain.

The Group is committed to limiting the risk of modern slavery occurring in its business, ensuring there is transparency in the business and in the approach to tackling modern slavery throughout our supply chain.

The Group expects employees and suppliers to share its commitment to help ensure modern slavery does not exist in our business and our supply chain.

Who we are

A leading provider of insurance repair building services, the Group has been providing specialist insurance repair services for more than 30 years.

From first response make safes, restoration, assessing and reporting of damage, through to repairs, the Group is committed to returning insured customers to their homes in the same or better condition than it was prior to the insurable event. The Group specialises in using local staff and trades to repair the homes in their suburbs and towns. The Group proudly partners with Australia's biggest and well-known insurers and loss adjusters to support their customers in their time of need.

Supply Chain

The Group has a relatively simple supply chain. Goods and services needed for day-to-day operations are procured from many building material suppliers operating in Australia and subcontract trades who provide equipment and construction related services.

The Group's long-term strategic relationships with key suppliers, provides stability in its supply chain and procurement processes.

IDENTIFYING RISKS OF MODERN SLAVERY

Operations

The Group has assessed the risk of modern slavery within its operations to be low. The directly employed workforce is only employed in the labour market in Australia, which is highly protected with strict regulations that apply to all employment conditions reflected in individual contracts and industry awards.

A whistle-blower policy and procedure details processes and communication pathways for employees, and suppliers, to disclose misconduct in our business and supply chain without recrimination.

Supply Chain

The Group has exposure to modern slavery supply chain risks being in the construction sector. This risk is across two areas:

1. Contractors; and
2. Goods and materials.

Contractors

The vast majority of the Group's suppliers' operations are based only in Australia. These suppliers have a lower risk of modern slavery occurring in their supply chains, as their operations are Australian based and are also required to comply with the Modern Slavery Act within their own supply chains. It is acknowledged that the construction and cleaning sectors are at risk of forced labour in the Global Slavery Index country profile for Australia on account of the higher rate of migrant labour that was present prior to the COVID 19 pandemic.

Goods and material suppliers

The Group procures goods and materials directly, from large material suppliers like Bunnings, and indirectly when contractors procure materials themselves in line with contracted work agreements.

Consideration has been given to the Group's modern slavery risks, or potential risks, within the Group's suppliers' operations and supply chains. The Global Slavery Index has identified a shortlist list of 15 imported products common in G20 countries, such as Australia, which present a risk of forced labour.

	COTTON: Kazakhstan, Tajikistan, Turkmenistan, Uzbekistan
	BRICKS: Afghanistan, India, Myanmar, Nepal, Pakistan
	GARMENTS – APPAREL & CLOTHING ACCESSORIES: Argentina, Brazil, China, India, Malaysia, Thailand, Vietnam
	CATTLE: Bolivia, Brazil, Niger, Paraguay
	SUGARCANE: Brazil, Dominican Republic
	GOLD: Democratic Republic of the Congo, North Korea, Peru
	CARPETS: India, Pakistan
	COAL: North Korea, Pakistan
	FISH: Ghana, Indonesia, Thailand, Taiwan, South Korea, China, Japan, Russia ¹⁰
	RICE: India, Myanmar
	TIMBER: Brazil, North Korea, Peru
	BRAZIL NUTS / CHESTNUTS: Bolivia
	COCOA: Côte d'Ivoire, Ghana
	DIAMONDS: Angola
	ELECTRONICS – LAPTOPS, COMPUTERS, & MOBILE PHONES: China, Malaysia

Source: www.globallslaveryindex.org/2018/findings/importing-risk/g20-countries/#figure:1

The Group potentially has exposure to five products on the short list as set out in the table below.

Shortlisted products	Relevant goods or materials
Cotton	Raw material used in manufacturing of uniforms, workwear, PPE
Bricks	Construction and building materials
Garments	Uniforms, workwear, PPE
Timber	Construction and building materials
Electronics	IT, computers, tablets, phones

ADDRESSING MODERN SLAVERY RISKS

Measures taken by the Group

All contractors are required to agree to terms and conditions which specifically address Modern Slavery ensuring they are all aware of the requirements and are implementing the Modern Slavery provisions in their own businesses.

For larger material suppliers, their Modern Slavery Statements are reviewed to ensure they have implemented and are managing the Modern Slavery provisions in their businesses and supply chain here and overseas.

New suppliers are also assessed during the onboarding process to ensure they have adequate steps to mitigate modern slavery risks in their organisations and supply chains and commit to following an ethical sourcing policy.

The Group maintains a close working relationship with its suppliers and encourages transparency and clear communication about modern slavery risks. The Group is committed to ongoing monitoring of its supply chain

in order to ensure that its operations are consistent with the Group requirements and take any further action as necessary, including termination of any engagements.

Governance framework and policies

The Group has a strong corporate governance framework and as part of its commitment to informing employees and suppliers in modern slavery risks. The Group conducts training with all employees on the requirements of Modern Slavery and it forms an integral part of onboarding process with new staff.

The Group also has in place a whistle-blower policy that is made accessible to all employees, workers, suppliers and persons entering worksites. The whistle-blower policy and procedure details processes and communication pathways for employees, and suppliers, to disclose misconduct in our business and supply chain without recrimination.

Standard procurement agreements and processes are regularly reviewed to ensure that the Group has sound governance processes in place to meet modern slavery compliance requirements.

ASSESSMENT OF ACTION TAKEN TO ADDRESS MODERN SLAVERY RISKS

The Group's modern slavery processes and internal governance are reviewed on an ongoing basis.

The Group has:

- published its Modern Slavery Policy;
- implemented the assessment of new suppliers with regard to the Modern Slavery provisions to identify modern slavery risks early with new suppliers during the onboarding process and during performance reviews;
- reviewed its procurement policy and procedures to ensure inclusion of modern slavery clauses; and
- updated agreements to include contractual obligations to address modern slavery compliance so that all new suppliers commit to adherence to the new modern slavery requirements.

EFFECTIVENESS OF ACTION TAKEN TO ADDRESS MODERN SLAVERY RISKS

The Group is in the process of designing a framework to measure and evaluate the effectiveness of modern slavery systems and controls.

Corporate governance

The Group will continue to review its policies and procedures to ensure that sound governance processes are in place to meet modern slavery compliance requirements.

The Group will conduct reviews of policies to ensure modern slavery compliance requirements are addressed and to increase employee awareness of the risks of modern slavery in the Group's business and its supply chain.

CONSULTATION

This statement has been prepared in consultation with all of the Group's brands and entities (listed above).

FUTURE DEVELOPMENTS

In the current reporting year, we aim to continue to revise and develop our approach to modern slavery compliance to build capacity within our business to monitor and act on modern slavery risks.

Awareness Raising Program

The Group aims to raise awareness and strengthen our understanding of the risk of modern slavery within our business and our supply chain by:

- Employees: Ongoing training to reinforce and refresh employees information on and their role in eliminating modern slavery in the Group's workplace and supply chain.
- Suppliers: Ongoing review and enhancement of processes and procedures to ensure suppliers are meeting and exceeding their Modern Slavery requirements within their own business and supply chain.

APPROVAL

This modern slavery statement is made by the Group for the financial year ending 30 June 2022.

This statement was approved by the board of directors of Insurance Building Australia Holdings, being the principal governing body of the Group, on 19 December 2022 (**Governing Body**).

This statement is signed by an authorised representative of the Governing Body:



Brett Ambrose

Chief Executive Officer

19th December 2022