

MODERN SLAVERY STATEMENT

MARCH 2021



OUR BUSINESS



Founded in 1914, Paynter Dixon (“The Company”) delivers property, master planning, design, construction, remedial and insurance services for building owners and occupiers.

Paynter Dixon is an incorporated company, domiciled in Australia under the Corporations Act 2001 (Cth). Australian owned and operated with offices across the eastern states of Australia, the Company delivers solutions in a variety of sectors, including hospitality, health and ageing, education, retirement living, commercial, insurance and remedial.

Our workforce is made up of a diverse group of property professionals including architects, engineers and project managers.

The wider Paynter Dixon Group of Companies includes:

- PAYCE Security Group

The Company’s supply chains include:

- The manufacture and transportation of the products we use in construction, such as bricks
- Services that contribute to our operations, such as the cleaning and security companies that service our offices and building sites
- The supply chains of our clients, consultants, and subcontractors.



POTENTIAL RISKS



Potential risks in our operations and supply chains

Following a review, the Company identified specific modern slavery risks within its business and its supply chain, as follows:

- A risk that the Company may contribute to modern slavery practices through its arrangements with third-party supplier factories and subsidiaries.
- Labour practices used by raw material suppliers.
- Geographical risks – some countries may have higher risks of modern slavery occurring.



ADDRESSING THE RISKS

A photograph of a room with vibrant red walls and a black ceiling. A red pendant light hangs from the ceiling. A red armchair with a tufted backrest sits in the center, with a black and white panda plushie sitting on it. To the right, a red desk lamp with a long adjustable arm is positioned. A window on the left side of the room shows a view of trees outside. The overall lighting is warm and monochromatic, dominated by the red color scheme.

Assessing and addressing the risk of modern slavery practices

During the reporting period and continuing into 2021, the following steps have been taken to improve the Company's understanding of and capacity to identify and manage modern slavery risks:

- Reviewing existing information on supply chains
- Assigning responsibility for assessing and addressing risks to a team or individual
- Developing an action plan
- Developing policies and procedures
- Staff training
- Engaging with suppliers.



ASSESSING OUR ACTIONS

Assessing the effectiveness of our actions

The Company assesses the effectiveness of its action to both assess and address modern slavery risks by:

- An annual review
- Regular engagement with suppliers
- Assessing new suppliers
- Identifying learnings
- Measuring progress.



CONSULTATION



Consultation

The Company and the entities it controls adopt a collaborative approach to combating modern slavery.

This collaboration occurs by:

Ensuring ongoing and meaningful dialogue occurs between entities on a regular basis. Our People & Culture team operates at a group level across all entities and thus has regular contact and oversight with the operations and procurement teams in each operating entity. The People & Culture team meet regularly with the procurement teams and regularly brief the Group's board on any relevant items of concern.

The Group's corporate culture is one that is founded on trust, transparent communication and respect. Therefore open dialogue around combating modern slavery is prevalent and actively encouraged.

This process will be regularly monitored and reviewed to ensure it remains effective throughout the course of the reporting period.



FUTURE COMMITMENTS



The Company is focused on continuously improving our awareness and response to the risk of modern slavery in our business and supply chains.

To further strengthen governance and controls around modern slavery risks, the Company is committed to:

- Reviewing and updating supplier contracts
- Reporting on progress
- Training staff
- Staying up to date with guidance issued in connection with modern slavery.

APPROVAL

This statement was approved by the Board of Directors of each of the three reporting entities covered by this statement under Paynter Dixon Holdings.

The Board of Directors of PAYCE Security Group Pty Ltd; Paynter Dixon Management Services Pty Limited; and Paynter Dixon Pty Limited approved this statement on 29 March 2021.

James Boyd

Director

PAYCE Security Group Pty Ltd

29 March 2021

James Boyd

Executive Chairman

Paynter Dixon Management Services Pty Limited

29 March 2021

James Boyd

Executive Chairman

Paynter Dixon Pty Limited

29 March 2021

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