



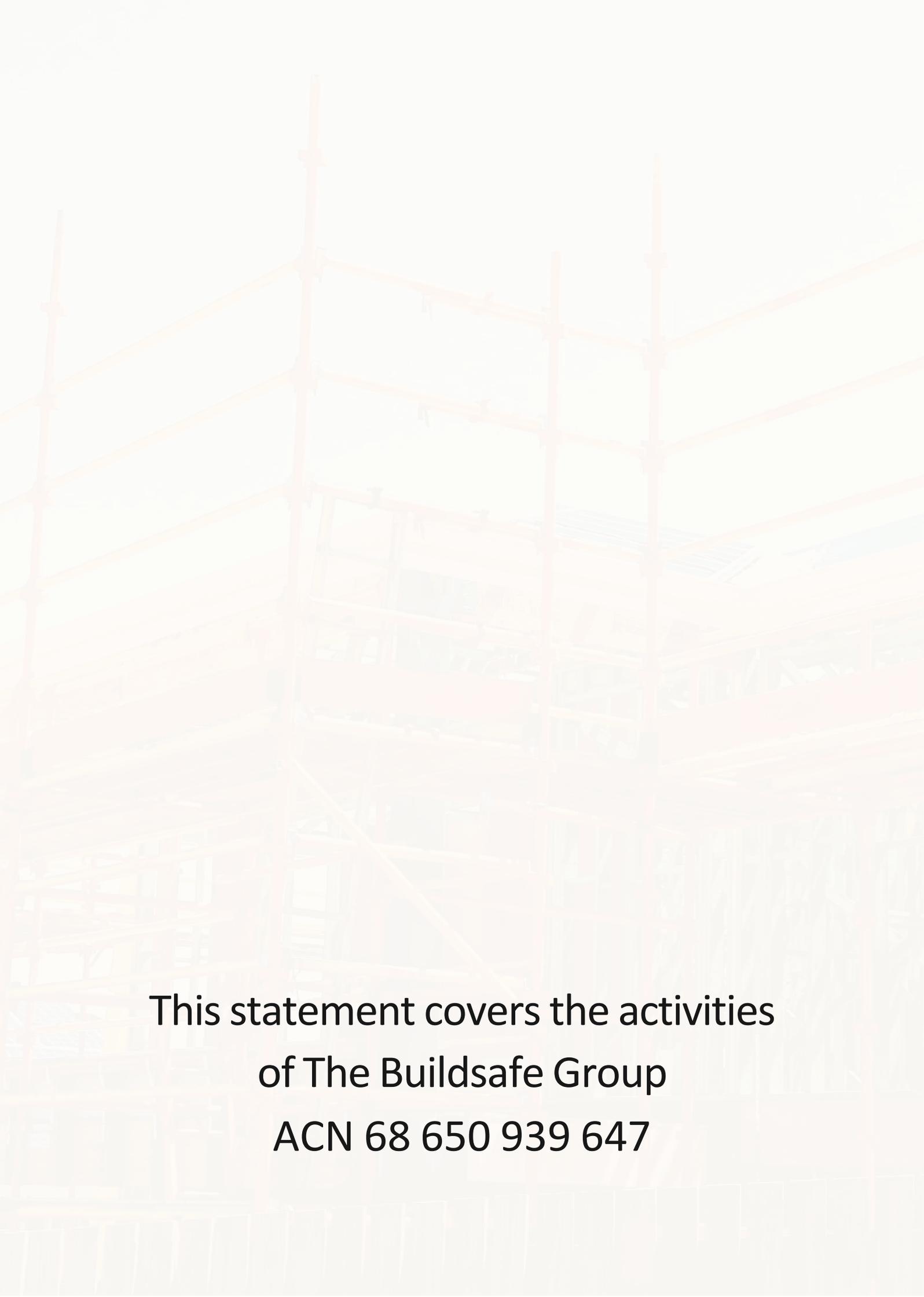
# BUILDSAFE

MODERN SLAVERY STATEMENT

2022 - 2023 FINANCIAL YEAR



SAFETY THROUGH INNOVATION



**This statement covers the activities  
of The Buildsafe Group  
ACN 68 650 939 647**

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## The Reporting Entity

Entity: Turtle BidCo Pty Ltd  
Business Name: Buildsafe Group  
ACN: 650 939 647  
Registered Office: 20 Newheath Drive, ARNDEL QLD 4214  
Website: [www.buildsafe.net.au](http://www.buildsafe.net.au)

## Approval by the Principal Governing Body

This modern slavery statement for FY2022-2023 was approved by the principal governing body of the Buildsafe Group, ACN 650 939 647, as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 29th November 2023.

## Signature of Responsible Member

This modern slavery statement is signed by a responsible member of the Buildsafe Group as defined by the Act.



Jeff Fraser  
Chair of the Board



## Buildsafe's Modern Slavery Statement

Buildsafe Group (Buildsafe) is pleased to produce this Modern Slavery Statement for FY2022-2023, in accordance with the requirements of the Australian Modern Slavery Act 2018 (Cth) (the Act). During FY2022-2023 Buildsafe reached an annual consolidated revenue of over \$100 million, therefore meeting the requirement to report under the Act.

Buildsafe acknowledges that we have a responsibility under the UN Guiding Principles on Business & Human Rights (UN Guiding Principles) to protect, respect and remedy human rights in all our business activities. Buildsafe recognises that Modern Slavery can occur within any business activity, and we are committed to reducing the risk of Modern Slavery in our operations and supply chains.

This inaugural Modern Slavery Statement is Buildsafe's first step in formally documenting and reporting our action plan, policies, procedures and processes relating to Modern Slavery risks. We look forward to further developing our approach to assessing, addressing and eliminating Modern Slavery risk during future reporting periods.



# Buildsafe's Structure, Operations & Supply Chains

## Buildsafe's Structure

The Buildsafe Group business is an Australian private company with its Head Office in Arundel Queensland and multiple branch operations in south-east Queensland, New South Wales and Victoria.

The Buildsafe Group business comprises the following trading entities:

- Buildsafe Australia Holdings Pty Ltd
- Buildsafe Sydney Holdings Pty Ltd
- Buildsafe Queensland Holdings Pty Ltd
- Buildsafe Head Entity Franchise Pty Ltd
- Buildsafe Northern Rivers Pty Ltd

Corporate governance is provided by the Buildsafe Group Board of Directors who oversee the strategic direction and management of the Buildsafe Group entity (Turtle BidCo Pty Ltd) and each trading entity. All Buildsafe trading entities operate under the common governance and direction of the Board and our Executive Management Team.



## Buildsafe's Operations

Buildsafe is one of Australia's leading providers of height safety solutions to the Australian property and construction industry. We supply and install fallguards, platforms, scaffolding and fencing as well as unique customised height safety and edge protection solutions.

We service our clients via 14 branch operations and two head offices across south-east Queensland, New South Wales and Victoria. Buildsafe has almost 500 employees and over 150 vehicles servicing our client's edge protection requirements through innovative product design, engineering and care for our people.

Since Buildsafe's inception in 2001, our primary focus has remained on being the most respected and sought after height safety provider across many of Australia's major capital cities. As a company, we place strong emphasis on developing and maintaining solid and reliable relationships with our clients, partners and supply chain.

Today, Buildsafe stands as an innovative leader in the height safety industry. Our company motto, 'Safety Through Innovation', is directly linked to providing efficient and effective height safety solutions by offering a simple, holistic service that complements the construction process. At Buildsafe, we value health and safety above all, and the Buildsafe name immediately communicates our commitment to providing a safe working environment for our staff, clients, partners and supply chain.

Our ethos positions us well for our Modern Slavery journey, as we work towards continuous improvement in assessing, addressing and eliminating Modern Slavery risk in our operations and supply chains.



## Buildsafe's Supply Chains

Buildsafe's supply chain relationships have been built over many years with reputable Australian and international businesses. Buildsafe's FY2022-2023 vendor spend includes:

- over 91% of products and services sourced from Australian businesses;
- almost 5% of suppliers of products and services located in China; and
- less than 4% of suppliers of services located in the Philippines, Canada and the USA.

The remaining 9% of Buildsafe's supply chain spend relates to Other Products and Services, including:

### Suppliers - Products

- Fuel
- Equipment design and manufacturing - Buildsafe height safety products
- Plant and general equipment

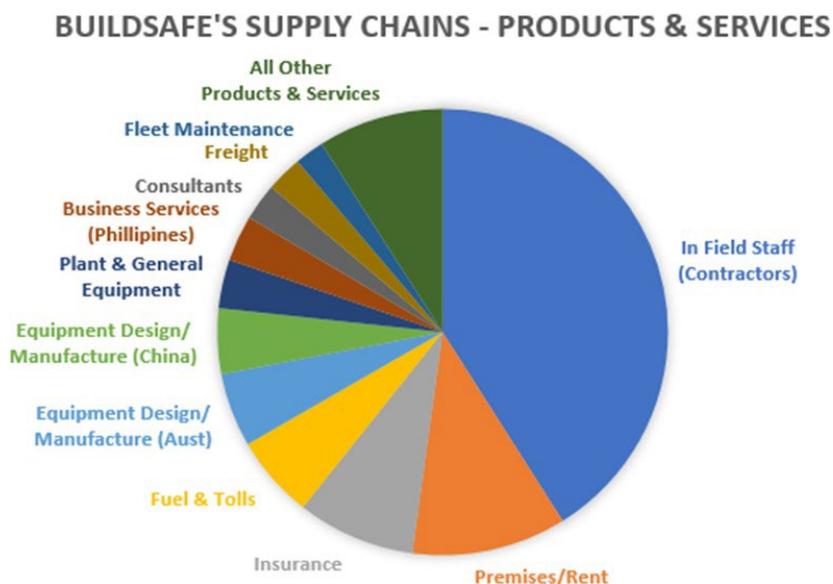
### Suppliers – Services

- In-field staff services (contractors)
- Premises expenses/rent
- Insurance
- Professional services - Drafting, Estimating, IT support
- Consultants - Business, Property, Recruitment
- Freight
- Fleet vehicle maintenance

The remaining 9% of Buildsafe's supply chain spend relates to Other Products and Services, including:

### Other Products & Services

- Hire equipment and consumables
- Workshop and yard consumables
- Staff amenities
- PPE and uniforms
- IT equipment and software
- Facility services
- Plant and equipment hire
- Utilities – Electricity, Water
- Training services
- IT services



## Risks of Modern Slavery Practices in our Operations & Supply Chains

Buildsafe has drawn on the UN Guiding Principles to perform our initial assessment of the risks of Modern Slavery practices in our operations and supply chains, considering the two key concepts of ‘connection to risks’ and ‘risk factor analysis’, outlined below.

### Connection to Modern Slavery Risks

Buildsafe acknowledges that every entity has the potential to ‘cause’, ‘contribute to’, or be ‘directly linked to’ Modern Slavery practices. By considering this, Buildsafe is developing an understanding of our connection to potential Modern Slavery risks in our operations and supply chains, and how we might mitigate or remediate situations should the need arise.

- **Cause** modern slavery - The risks that an entity’s operations may directly result in Modern Slavery.
- **Contribute to** modern slavery - The risks that an entity’s operations and/or actions in its supply chains may contribute to Modern Slavery. This includes acts or omissions that may facilitate or incentivise Modern Slavery.
- **Directly linked to** modern slavery - The risks that an entity’s operations, products or services may be connected to Modern Slavery through the activities of another entity it has a business relationship with. A business’ relationships include all of the entities in its supply chain, including entities it does not have a direct contractual relationship with.

### Modern Slavery Risk Factor Analysis

Buildsafe also acknowledges that potential Modern Slavery risks in our operations and supply chains can be influenced by risk factors such as sector/industry risk, product/services risks, geographic risks and entity risks. By considering these factors, Buildsafe has begun to understand areas of our operations and supply chains with a higher likelihood for Modern Slavery risks.

- **Sector or Industry Risk** - Certain sectors and industries may have high Modern Slavery risks because of their characteristics, products and processes.
- **Product or Services Risk** - Certain products and services may have high Modern Slavery risks because of the way they are produced, provided or used.
- **Geographic Risk** - Some countries may have higher risks of Modern Slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty.
- **Entity Risk** - Some entities may have particular Modern Slavery risks because they have poor governance structures, a record of treating workers poorly or a track record of human rights violations.

## Initial Assessment of Buildsafe's Operations and Supply Chains

Buildsafe's FY2022-2023 initial assessment of our operations and supply chains is summarised in the tables below.

Our analysis has provided us with areas of focus as we begin to assess and address potential risks of Modern Slavery in our operations and supply chains. During the upcoming FY2023-2024 reporting period, Buildsafe will further examine both our connection to, and the risk factors for, Modern Slavery practices. We plan to focus on our high spend and higher risk Tier 1 supply chain vendors, with the view to expanding our analysis to our extended supply chains in future reporting years.

### Operations

| <b>Buildsafe's Operations<br/>Modern Slavery Risk Factors</b> | <b>Global Level of<br/>Modern Slavery Risk</b> | <b>Buildsafe's Connection<br/>to Potential Modern Slavery Risk<br/>(Cause / Contribute / Linked)</b> |
|---|--|--|
| <b>Sector or Industry Risks</b>                               |  |  |
| Construction Industry   | High potential                                 | Cause  |
| Manufacturing Industry  | High potential                                 | Cause  |
| Professional Services Industry                                | Low potential                                  | Cause  |
|   |  |  |
| <b>Product or Services Risks</b>                              |  |  |
| Construction Equipment  | Mid potential                                  | Cause  |
| Construction In-Field Services                                | High potential                                 | Cause  |
| Business Professional Services                                | Low potential                                  | Cause  |
|   |  |  |
| <b>Geography Risks</b>  |  |  |
| Australia   | Low potential                                  | Cause  |
|   |  |  |
| <b>Entity Risks</b>   |  |  |
| Australia   | Low potential                                  | Cause  |
|   |  |  |

All Buildsafe Group employees are employed under Fair Work Australia-approved enterprise bargaining agreements or individual workplace agreements (permanent, fixed term, part-time or casual contracts) that meet or exceed the minimum requirements of an applicable award.

## Supply Chains - Products

| <b>Buildsafe's Supply Chains - Products<br/>Modern Slavery Risk Factors</b>  | <b>Global Level of<br/>Modern Slavery Risk</b> | <b>Buildsafe's Connection<br/>to Potential Modern Slavery Risk<br/>(Cause / Contribute / Linked)</b> |
|--|--|--|
| <b>Sector or Industry Risks</b>  |  |  |
| <b>Tier 1 Suppliers – Products</b><br>- Manufacturing - Fuel/Petroleum - Automotive<br>- Retail/Wholesale Trade - IT   | Low to high potential                          | Contribute   |
| <b>Tier 2 &amp; below Suppliers – Products</b><br>- Manufacturing - Warehousing & Logistics - Shipping<br>- Fabrication - Metal Production - Mining - Refining | High potential                                 | Linked   |
|  |  |  |
| <b>Product or Services Risks</b>   |  |  |
| <b>Tier 1, 2 &amp; below Suppliers – Products</b><br>- Construction Equipment - Fuel - Vehicles - IT<br>- PPE - Uniforms - Office Equipment & Supplies         | Low to high potential                          | Contribute to Linked   |
|  |  |  |
| <b>Geography Risks</b>   |  |  |
| <b>Tier 1 Suppliers – Products</b>   |  |  |
| - Australia  | Low potential                                  | Contribute   |
| - China  | High potential                                 | Contribute   |
| - USA  | Low potential                                  | Contribute   |
| <b>Tier 2 &amp; below Suppliers – Products</b>   |  |  |
| - Australia - USA - Europe   | Low potential                                  | Linked   |
| - China - Asia - Africa - others not yet identified  | Low to High potential                          | Linked   |
|  |  |  |
| <b>Entity Risks</b>  |  |  |
| <b>Tier 1 Suppliers – Products</b>   |  |  |
| - Australia  | Low potential                                  | Contribute   |
| - China  | High potential                                 | Contribute   |
| <b>Tier 2 &amp; below Suppliers – Products</b>   |  |  |
| - Australian & overseas suppliers  | Low to High potential                          | Linked   |
|  |  |  |

### Australian Products

Buildsafe's local Tier 1 supply chain is made up of several vendors with operational representation in Australia, offering products manufactured overseas, such as vehicles, tools, fasteners, PPE and uniforms.

### International Products

Buildsafe has long-term arrangements with Equipment Designer/Manufacturers located in China. In FY2022-2023 these relationships represented 5% of our vendor spend, or 10% when including Australian businesses that manufacture in China. Buildsafe has a dedicated international purchasing team that works strategically and diligently with our international product suppliers.

## Supply Chain - Services

| <b>Buildsafe's Supply Chains - Services<br/>Modern Slavery Risk Factors</b>  | <b>Global Level of<br/>Modern Slavery Risk</b> | <b>Buildsafe's Connection<br/>to Potential Modern Slavery Risk<br/>(Cause / Contribute / Linked)</b> |
|--|--|--|
| <b>Sector or Industry Risks</b>  |  |  |
| <b>Tier 1 Suppliers – Services</b>   |  |  |
| - Construction - Manufacturing - Property<br>- Insurance - Professional Services - Freight<br>- Business Consulting - Automotive | Low to High potential                          | Contribute   |
| <b>Tier 2 &amp; below Suppliers – Services</b>   |  |  |
| - Manufacturing - Retail/Wholesale Trade<br>- Warehousing & Logistics - Shipping   | High potential                                 | Linked   |
|  |  |  |
| <b>Product or Services Risks</b>   |  |  |
| <b>Tier 1, 2 &amp; Below Suppliers – Services</b>  |  |  |
| - In-Field Staff (Contractors)   | High potential                                 | Contribute   |
| - Professional Services eg IT Development &<br>Draftsman Services  | Low potential                                  | Contribute   |
| - Business Services eg Drafting, Estimating, IT,<br>Financial Administration, Project Scheduling                                 | Low potential                                  | Contribute   |
| - Freight  | High potential                                 | Contribute   |
| - Mechanics - Cleaning - Gardening - Pest Control  | Low to High potential                          | Contribute   |
|  |  |  |
| <b>Geography Risks</b>   |  |  |
| <b>Tier 1 Suppliers – Services</b>   |  |  |
| - Australia  | Low potential                                  | Contribute   |
| - Philippines, Malaysia  | High potential                                 | Contribute   |
| - Canada   | Low potential                                  | Contribute   |
| <b>Tier 2 &amp; below Suppliers – Services</b>   |  |  |
| - Australia - Philippines - Malaysia - Canada - China  | Low to High potential                          | Linked   |
| - Europe - others not yet identified   | Low to High potential                          | Linked   |
|  |  |  |
| <b>Entity Risks</b>  |  |  |
| <b>Tier 1 Suppliers – Services</b>   |  |  |
| - Australia  | Low potential                                  | Contribute   |
| - Philippines - Malaysia   | High potential                                 | Contribute   |
| - Canada   | Low potential                                  | Contribute   |
| <b>Tier 2 &amp; below Suppliers – Services</b>   |  |  |
| - Australian & overseas suppliers  | Low to High potential                          | Linked   |

## Australian Services

In-Field Staff (Contractors): in-field staff (contractors) provide Buildsafe with labour services including erecting, maintaining and dismantling Buildsafe equipment on constructions sites. In FY2022-2023 in-field staff (contractors) made up 41% of Buildsafe's overall vendor expenditure. All of Buildsafe's in-field staff (contractors) are trusted local small businesses with between one to ten employees. These contractors are often former Buildsafe employees who have received extensive training and support from Buildsafe over many years. Buildsafe's standard subcontract conditions require in-field staff contractors to meet legislative requirements, including the Fair Work Act 2009 (Cth).

Freight & Logistics: Buildsafe utilises global logistics companies through their Australian offices to administer our international freight requirements. Our larger Australian logistics vendors are required to report their own Modern Slavery Statements under the Modern Slavery Act 2018 (Cth) and similar international requirements.

Other Services: Buildsafe branch operations engage local businesses for services such as mechanics, cleaners, gardeners, pest control, etc.

## **International Services**

Professional Services Contractors: Buildsafe engages highly skilled independent contractors based in the Philippines, Malaysia and Canada to provide specialist professional services such as IT Development and Technical Design Draftsman Services. Our independent contractors are remunerated with fair and competitive rates which are appropriate for the markets in which they operate. Each contractor has their own contractual agreement with Buildsafe, which outlines the terms and conditions of their engagement, and is in line with the applicable laws and regulations in each country. In FY2022-2023 Buildsafe worked with eight (8) independent contractors – six in the Philippines, one in Malaysia and one in Canada.

Business Services Contractors: Buildsafe also engages skilled and semi-skilled contractors in the Philippines to carry out a range of business services such as engineering drafting, estimating, IT support, financial administration, project scheduling and site auditing. Buildsafe has servicing agreements with each contractor which includes specific clauses requiring compliance to local labour laws and fair rates of remuneration in line with relevant markets. In FY2022-2023 Buildsafe worked with 29 contractors under servicing agreements in the Philippines.



## Actions Taken to Assess & Address Risks, including Due Diligence & Remediation Processes

During the FY2022-2023 reporting period, Buildsafe began the process of considering Modern Slavery risks within our operations and supply chains and how we can best assess and address these potential risks. Our Modern Slavery assessments included mapping of our operations and supply chains, supply chain vendor spend analysis, and review of Buildsafe's governance practices, policies, procedures, contractual arrangements and staff training.

Our assessments have provided us with an action plan for how Buildsafe will assess and address Modern Slavery risks, including due diligence and remediation processes, into the future. We will work on the following actions during the FY2023-2024 reporting period and beyond:

- Create a Buildsafe Modern Slavery Policy, including remediation processes
- Develop a Buildsafe Supplier/Vendor Code of Conduct, incorporating Modern Slavery
- Update Buildsafe's current subcontractor agreements (and standard form) to include Modern Slavery clauses
- Update Buildsafe's Grievance Policy and implement Buildsafe's Whistleblower Policy to include Modern Slavery
- Develop a Buildsafe Modern Slavery Risk Assessment Tool - a systematic procedure for Buildsafe to assess Modern Slavery risks and conduct due diligence on our supply chain partners.
- Introduce Modern Slavery risk reviews to Buildsafe's supply chain partners, starting with our high spend and higher risk Tier 1 suppliers of products and services
- Provide Modern Slavery information, resources and training to Buildsafe procurement staff
- Investigate restarting factory inspections of higher risk international supply chain partners (put on hold during COVID19 travel restrictions), or partnering with a suitable organisation that provides this service
- Develop a procedure to enable Buildsafe to actively participate in our clients' Modern Slavery reporting processes, when required. Buildsafe is in the Tier 1 supply chains of several large construction entities (our clients) who report under the Modern Slavery Act 2018 (Cth)
- Identify relevant industry collaboration opportunities and initiatives related to Modern Slavery, such as information sessions, webinars, newsletters etc



## How we Assess the Effectiveness of Actions we take to Assess & Address Modern Slavery Risks.

Buildsafe is committed to ensuring the effectiveness of the actions we take to assess and address Modern Slavery risks in our operations and supply chains. We will assess the effectiveness of our actions via internal operational monitoring, governance and reporting, and external reporting.

### Internal Operational Monitoring

Internal Modern Slavery monitoring and reporting will form part of Buildsafe's standard operating procedures. During the FY2023-2024 reporting period, as we deliver on our Modern Slavery action plan, we will introduce periodic monitoring and review points, overseen by our Executive Management Team.

### Internal Governance & Reporting

Buildsafe will elevate Modern Slavery risk monitoring and reporting to the highest levels of our organisation. Modern Slavery will be included in our internal audit processes, as well as adding Modern Slavery Risk into our integrated risk management and monitoring systems. These are managed by Buildsafe's Executive Management Team, with oversight and ultimate responsibility resting with our Board of Directors.

Buildsafe's Board will monitor the progress of our Modern Slavery actions at least six-monthly, via periodic consideration of internal audit, integrated risk management and our annual Modern Slavery Statement.

### External Reporting

Buildsafe's FY2022-2023 Modern Slavery Statement will be submitted to the Australian Online Register of Modern Slavery Statements where it is publicly available for all stakeholders to view and consider.

Our Modern Slavery Statement will also be made publicly available via our Buildsafe website and available on request for any clients, partners, supply chain members or other stakeholders who wish to review it.



### **The process of consultation with entities that Buildsafe owns or controls**

As detailed in Section 1, Buildsafe Group (Turtle BidCo Pty Ltd), as the Modern Slavery Statement reporting entity, owns and controls several other entities for administrative and accounting purposes.

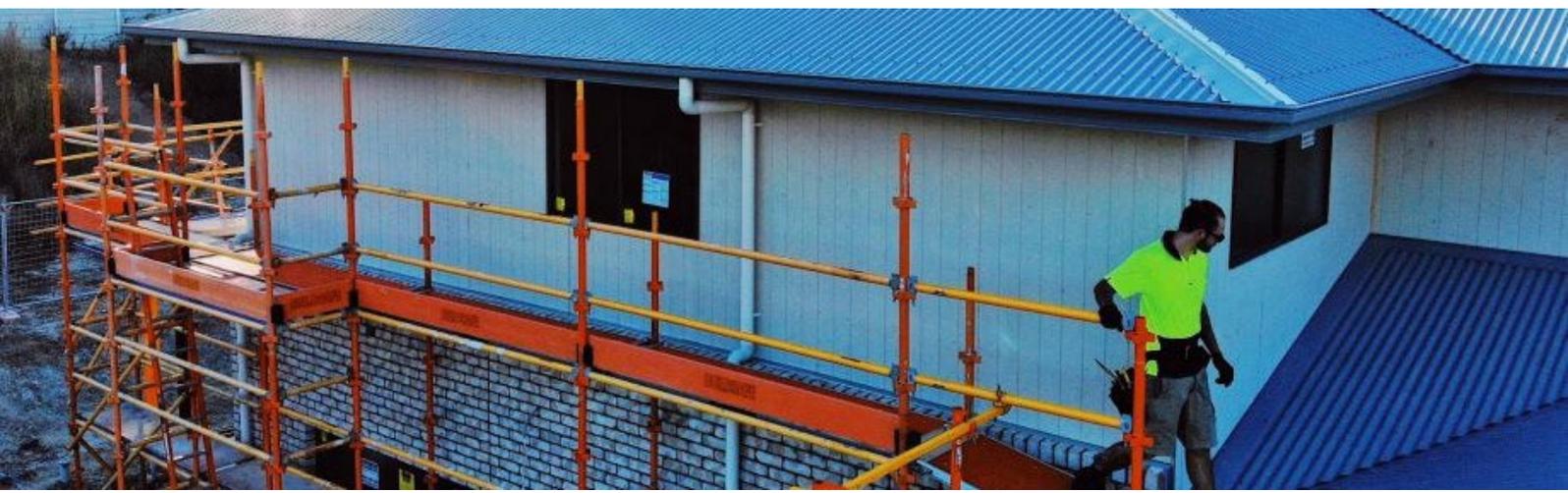
All Buildsafe entities work closely together, with operational oversight provided by a common Executive Management Team and governance by our Board of Directors. All Buildsafe entities adhere to the same organisation-wide policies and procedures set by Buildsafe Group, which will include the Buildsafe Modern Slavery Policy once developed.

Consultation across all the entities that Buildsafe Group owns and controls occurs via our Executive Management Team which is responsible for all of Buildsafe's related entities. The Executive Management Team oversees the Modern Slavery statement processes and, as such, Buildsafe is satisfied that the Modern Slavery risks relating to its entities will be appropriately identified, assessed and addressed where necessary.

### **Other relevant information**

Buildsafe acknowledges the importance of identifying modern slavery risks and we are committed to reducing the risk of Modern Slavery in parts of our business operations and supply chains.

Since FY2022-2023 is our first reporting year under the Act, we look forward to enacting our Modern Slavery action plan (Section 4 above) and developing a range of policies, procedures and systems for reporting in our FY2023-2024 Modern Slavery Statement and beyond.





**SAFETY THROUGH INNOVATION**

