



Tomkins Commercial & Industrial Builders

# Modern Slavery Statement





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## MESSAGE FROM THE SOLE DIRECTOR

At Tomkins, we seek to address abuse of human rights within the wider construction industry supply chains. We support the ongoing efforts to address this global issue and the leadership of the International Labour Organization (ILO), which has identified construction, manufacturing, mining and utility industries as targets for eliminating human rights abuse.

Tomkins will continue to report annually on the risks of modern slavery in our operational and supply chains and take actions to address those risks. We will proactively audit our supply chain with a commitment to ensuring workers within our supply chain are treated fairly, ethically and with respect. We also recognise that our industry has exposure to modern slavery risks through challenges to supply chain transparency.

To address this risk, we will support our staff and contractors to achieve responsible procurement

across our business. Our initiatives will mitigate risks in our supply chain not complying with human rights, labour rights and environmental laws as we identify non-compliance and long-term job security of our people, suppliers and subcontractors.

This modern slavery statement outlines our actions and commitment to work with our project and industry contractors; plus our suppliers to understand the supply chain risks and eliminate modern slavery in our operations.

*Mike Tomkins*

Sole Director

Tomkins Commercial & Industrial Builders Pty Ltd

## INTRODUCTION

Tomkins is committed to operating ethically and transparently, ensuring compliance with the Modern Slavery Act 2018 (Cth) and that modern slavery does not exist in our operations or supply chains.

This statement outlines the actions we have taken during the 2023/2024 reporting period to identify, assess and address risks related to modern slavery.

For more than 70 years, Tomkins has embodied that ethos by building strong relationships with clients across Australia.

With more than \$200 million of work-in-hand, Tomkins' profile and capabilities have consolidated to deliver large-scale industrial and residential

projects while remaining true to its origins of continuing to deliver smaller specialty builds and tenancy fitouts that our clients continue to value.

**Tomkins Commercial & Industrial Builders Pty Ltd**  
**T/As Tomkins Commercial & Industrial Builders**

**ABN 98 061 732 778 | ACN 061 732 778**



**3** LOCATIONS  
ACROSS  
QUEENSLAND



**500+** PROJECTS  
COMPLETED  
TO DATE



**90%** OF OUR SUPPLIERS  
ARE BASED IN  
AUSTRALIA

*Building is more than a contract – it's a relationship.*

## OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Tomkins is a leading construction company based in South East Queensland, specialising in the delivery of commercial, industrial and institutional projects. We employ over 150 staff and engage with a diverse network of subcontractors, suppliers and consultants across Australia.

Our supply chain includes:

- Procurement of building materials such as steel, concrete and timber – sourced both domestically and from international markets, including regions in Asia and Europe known for higher labour exploitation risks;

- Engagement of subcontractors for specialised trades;
- Acquisition of equipment and machinery for construction projects; and
- Corporate services including IT, professional services and office supplies.

BRISBANE Head Office	SUNSHINE COAST Office	GOLD COAST Office
11 Ashtan Place Banyo QLD 4014	Unit 4 / 21-23 First Av Maroochydore QLD 4558	GL /72 Nerang St Southport QLD 4215

## TOMKINS WORKFORCE

### OUR PEOPLE

As at 30 June 2023, Tomkins employed 153 staff, nearly all of whom were employed directly and under permanent, fixed-term, part-time or casual contracts or under an enterprise bargaining agreement. Like many other employers in our industry, Tomkins makes use of licensed labour-hire providers, working with highly regulated organisations providing these services.

All Tomkins and labour hire employment contracts comply with the relevant Modern Award or better and the National Employment Standards (NES) or higher employment standards. These arrangements significantly reduce the likelihood of modern slavery.



### SUBCONTRACTORS

Tomkins is a design and construct, construct only and project management construction company in which most worksite activities are subcontracted to Queensland-based businesses. Tomkins deals with approximately 100 subcontractor businesses at any one time – with most of these businesses classified as small to medium enterprises.

Our subcontractors engage most of their employees directly. Tomkins provides support and conducts reviews of their compliance to relevant employment laws. In some instances, these subcontractors engage their own subcontractors or material suppliers. Tomkins' subcontract contract terms require subcontractors to seek approval before subcontracting any of their own works.

We acknowledge that we may not always have direct supervision over our third-party workforce or complete transparency over their terms and conditions of employment.

## PROCUREMENT

As part of our standard procurement practice, all suppliers and subcontractors, regardless of their location of operations, are required to comply with Tomkins contract terms which include a Supplier Code of Conduct. This contractual term outlines our zero-tolerance policy in relation to modern slavery.

In the reporting year, we sourced goods and services from Australian-based suppliers and subcontractors, including:

- Professional services
- Trade services
- Construction materials and services
- Cleaning and waste removal
- Plant and equipment hire
- Labour hire
- Electrical and data services
- Office supplies and maintenance

In addition, we sourced limited goods and services directly from overseas-based suppliers, mainly glazing from China and more specifically a car staking lift.

We acknowledge that construction materials can be processed and assembled in different countries, which can elevate the risk of modern slavery. Our supply chain for raw materials is complex and often unclear, making it extremely challenging for end users to trace their origins, so we are vigilant in our approach to monitoring this.





## MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN

The construction industry is particularly prone to labour exploitation due to the use of temporary workers in low-skilled and low-wage roles. Within Australia, the on-site workforce is more easily monitored and regulated; however, risks can arise in subcontractor arrangements and overseas material procurement. Globally, construction workers account for up to 18% of those impacted by modern slavery practices, particularly in high-risk economic regions.

### LABOUR HIRE RISKS

Despite strong licensing and compliance processes in Australia, there remains a risk of underpayment and exploitation of migrant workers by third-party labour hire agencies. To address this, Tomkins actively monitors on-site contractors, behaviours and labour practices. In addition, external reviews and training ensure subcontractors are compliant with Australian workplace laws and ethical standards.

### CONSTRUCTION MATERIALS

The procurement of construction materials presents one of the most significant challenges in assessing labour rights, safety and human rights compliance. Materials such as timber, steel, plastic, glass, cement, gypsum, hardware, metals, tiles, textiles, brick, stone and sand are often sourced from international suppliers where modern slavery risks are more prevalent. Tomkins continues to

prioritise transparency by assessing high-risk suppliers and promoting ethical sourcing practices.

### PARTS & MECHANICAL EQUIPMENT

We recognise that overseas supply chains for parts, machinery, engine components and manufactured goods expose workers to modern slavery risks. These risks include unsafe working conditions, underpayment and exploitation – particularly in the production of metals and equipment components.

### ELECTRONICS SUPPLY CHAIN

Electronics supply chains are often linked to hidden modern slavery risks, including hazardous working conditions and child labour, particularly in regions producing electronic components. Tomkins acknowledges these challenges and works to better identify and prioritize risks within this category to ensure collective compliance on our projects.



*How we prevent and mitigate  
the risk of modern slavery.*

**TOMKINS COMMERCIAL** has collaborated with our supply chain to better understand the origin and circumstances surrounding the products and services we utilise.

Through this collaboration, we have acquired valuable knowledge about specific areas that may necessitate further inquiry to ensure that our supply chains comply with applicable regulations.



## AREAS OF RISK WITHIN THE CONSTRUCTION INDUSTRY

### MATERIALS

Materials commonly used for construction purposes, such as timber, steel, glass and textiles, often originate from regions with a heightened risk of modern slavery. These materials are susceptible to unethical labour practices during extraction, manufacturing or transportation. Tomkins encourages our suppliers to undertake rigorous due diligence, including supplier audits and certifications to ensure materials are sourced responsibly and ethically before entering Australia.

### OPERATIONS

Within Tomkins' operations and those of our suppliers, several goods and services remain high-risk areas for modern slavery, including:

- Cleaning Services – often reliant on vulnerable, low-skilled workers who may lack proper work authorisations.
- Electronics – supply chains for electronic components are known for hidden risks, including child labour and hazardous working conditions.
- Stationery and Garments – products sourced internationally may come from regions with limited oversight of labour practices.

### SERVICES

The provision of services within the construction industry, including subcontracting arrangements, poses notable risks that require careful monitoring:

Sham contracting	Subcontracting arrangements	Poor conditions
Sham contracting occurs when employers misrepresent employment relationships as independent contractor arrangements to circumvent legal obligations, such as minimum wages and employee protections. This unethical practice can leave workers vulnerable to exploitation, particularly those with limited understanding of their rights.	Complex and multi-tiered subcontracting arrangements are a defining feature of the construction industry. While necessary for project delivery, these arrangements create challenges in tracking workforce conditions across all tiers. The lack of transparency at lower subcontracting levels increases the risk of unethical labour practices, including forced labour and wage exploitation.	Vulnerable workers, such as those employed in part-time or casual roles, migrant workers and security personnel, are often at higher risk of exploitation. These groups may face: <ul style="list-style-type: none"><li>• Unsafe working environments;</li><li>• Coercion into taking jobs with substandard conditions;</li><li>• Excessively long hours without appropriate compensation; and</li><li>• Fear of deportation due to improper work authorisations.</li></ul>

Tomkins remains vigilant in monitoring service-related risks by conducting supplier reviews, requiring modern slavery declarations and engaging with subcontractors to promote adherence to ethical employment practices.

## COMPLIANCE & GOVERNANCE

Tomkins is committed to compliance in all aspects of its operations.

### STRONG SYSTEMS

Tomkins has a strong and robust quality management system to provide expertise across a wide range of issues and project forms and deliver a framework that ensures compliance across our compliance obligations, including modern slavery, construction, health and safety, environmental and procurement disciplines.

### QUALITY AND COMPLIANCE

To ensure we deliver quality and compliance, we have a dedicated team of professionals whose key focus is on the quality of our work throughout design, construction and delivery. Our Quality Manager regularly audits our sites to ensure compliance with not only the relevant standards and building codes but with the high standards expected of Tomkins.

### QUALITY MANUAL

The team have developed a Quality Manual to provide technical information to our teams and to define the minimum requirements our project teams need to comply with. New chapters of the Quality Manual are regularly added, reviewed

and updated to align with changing compliance and include our Modern Slavery obligations. In combination with the Quality Manual, the Safety Manager has also implemented quality-focused training programs to continually educate our team on the expected standards and our compliance obligations.

### PROPERTY, CONSTRUCTION AND MODERN SLAVERY

Practical responses to managing risks to people is a guide to help the property and construction industry respond effectively to the Modern Slavery Act 2018 (Cth). The Act requires Tomkins to report annually on their efforts to address risks of modern slavery in their operations and supply chains.

Our Modern Slavery Management Framework has been developed to prevent, detect and respond to incidents of modern slavery abuses in our operations and supply chain. Our policies and procedures which are reviewed regularly to ensure compliance.

### POLICIES

The following policies and procedures outline Tomkins' approach to managing risk in relation to modern slavery:

Policy/Procedure	Purpose
Supplier and Contractor Code of Conduct	Sets Tomkins' minimum standards of the conduct of our subcontractors and suppliers in the areas of labour, human rights, integrity, ethics, health, safety, environment and tax compliance.
Whistleblower Policy (CLG-POL-18)	Provides a reporting framework through which Tomkins employees, subcontractors, suppliers and members of the public can report instances of actual or suspected unethical or unlawful conduct without fear of reprisal.
Whistleblower Procedure (CLG-PRO-12)	The procedure applies to disclosures who wish to disclose reportable conduct regarding Tomkins' activities.
Modern Slavery Policy (CLG-PLO-16)	Outlines Tomkins' commitment to developing our business sustainably by effectively managing economic, environmental and social risks and opportunities.

## CONTRACTUAL AND MANAGEMENT CONTROLS

Tomkins encourages a contractual and cooperative approach in working with project partners and suppliers on implementing risk mitigation measures in our supply chain.

We recognise that direct engagement with our subcontractors, supported by contractual obligations and diligent oversight, is the most effective step in identifying and addressing modern slavery risks. To address this, we:

- Issue a modern slavery self-assessment questionnaire (SAQ) to be completed prior to appointment as a supplier or subcontractor;
- Include Modern Slavery questions in our Pre-Tender interviews;
- Conduct training for Tomkins employees;
- Provide on-site inductions covering Modern Slavery issues and indicators;
- Display site and office signage promoting whistleblower details and indicators of modern slavery; and
- Review and update policies and procedures on an annual basis.

## REPORTING OF HUMAN RIGHTS CONCERNS

Tomkins has a whistleblower mechanism that allows employees, subcontractors, suppliers, clients and members of the public to anonymously report instances of actual or suspected modern slavery associated with the company's operations.

During the reporting period, no concerns were reported or raised.

## RESPONSE AND REMEDY FRAMEWORK

Throughout the reporting period, Tomkins developed its own tailored approach to address modern slavery risks, focusing on direct engagement, prevention and remediation. Our response is guided by the nature of our relationship to the harm:

### Cause

When Tomkins' own activities directly result in harm (e.g., forced labour within company-controlled operations).

### Contribute

When Tomkins' activities enable or facilitate harm caused by a third party (e.g., engaging a supplier that fails to pay workers adequately).

### Directly linked

When harm occurs in connection with Tomkins' products, services or operations through a business relationship (e.g., a supplier further down the supply chain exploits its workers).

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Tomkins remains committed to addressing and remediating modern slavery risks through proactive measures, transparency and continuous improvement in our operations and supply chains.



## MEASURING THE EFFECTIVENESS OF OUR MODERN SLAVERY FRAMEWORK

### 2023/2024 PROGRESS

Building on our initial framework established in 2022/2023, we have taken significant steps to strengthen our modern slavery risk management processes. This year, the focus has been on embedding these measures into our operations, expanding engagement with suppliers and refining our due diligence practices.

Key actions	Progress	Detail
Provide modern slavery awareness training for Tomkins employees and subcontractors on project sites	Completed (NB. ongoing training is provided for all new employees and sub-contractors)	All staff and subcontractors are required to complete modern slavery awareness training, noting 97% of all staff completed the training module during the reporting period. <sup>1</sup>  A modern slavery section has been incorporated into our site induction pack and signage is displayed at all work sites and offices.
Initiating a collaborative approach with competitors to standardise modern slavery due diligence processes with subcontractors	Ongoing	Continued engagement with industry consortium and Tier 2 contractors to align processes for subcontractor oversight.
Develop remediation framework	In Progress	Tomkins has commenced work on a tailored remediation framework to address identified risks and implement corrective actions.
Providing additional educational materials to our suppliers and contractors	Expanded	Educational resources have been made available to suppliers, with increased engagement on modern slavery risks and best practices.
Implement compulsory annual modern slavery assessments for contractors	Implemented	Annual modern slavery assessments are now a mandatory requirement for all contractors engaged by Tomkins.
Integration of modern slavery Assessments into our Tender process	Enhanced	Modern slavery risk assessments have been fully integrated into our tender evaluation process, with risk weighting applied to contractor submissions.

## CONTINUAL IMPROVEMENT

### FUTURE COMMITMENTS

For the 2024/2025 reporting period, we aim to:

- Introduce digital tools to enhance supplier monitoring and reporting.
- Improve record keeping to ensure compliance with the Acts.
- Collaborate with industry bodies to share best practices and drive collective action standards.





## APPROVAL

Mr Michael Tomkins, as the Director, was involved in the development, consultation and implementation of this Modern Slavery Statement. Tomkins maintains a consistent leadership team, including the Operations Manager, Head of Corporate Services and four senior members who assist in implementing the process. This statement was approved and signed by Michael Tomkins as the Sole Director and principal governing body of Tomkins on 19 December 2024.

Michael Tomkins  
Sole Director  
Tomkins Commercial & Industrial Builders Pty Ltd