

# MODERN SLAVERY STATEMENT FY 23/24

## PERKINS (WA) PTY LTD T/A PERKINS BUILDERS

### REPORTING ENTITY

This Modern Slavery Statement is made in accordance with the Modern Slavery Act 2018 (CTH).

Structured as a private proprietary limited entity with Perkins Investments (WA) Pty Ltd as trustee for the Perkins Investment Trust, a discretionary trust as our sole shareholder. The beneficial owners of the Perkins Investment Trust are members of the Perkins family, with Mr Daniel Perkins as the Sole Director and Sole Shareholder. The Perkins Investment Trust has a number of interests.

Of these interests, the mandatory reporting entities under the Act are:

Perkins (WA) Pty Ltd | ABN: 60 008 844 862

Other entities as per the organisational chart (Figure 1) are not mandatory reporting entities under the Act, but are controlled by Mr Daniel Perkins as Sole Director and Sole Shareholder, with the exception of Coastroad Development Pty Ltd Trustee Co and Coastroad Development Trust where Mr Daniel Perkins has a 50% share.

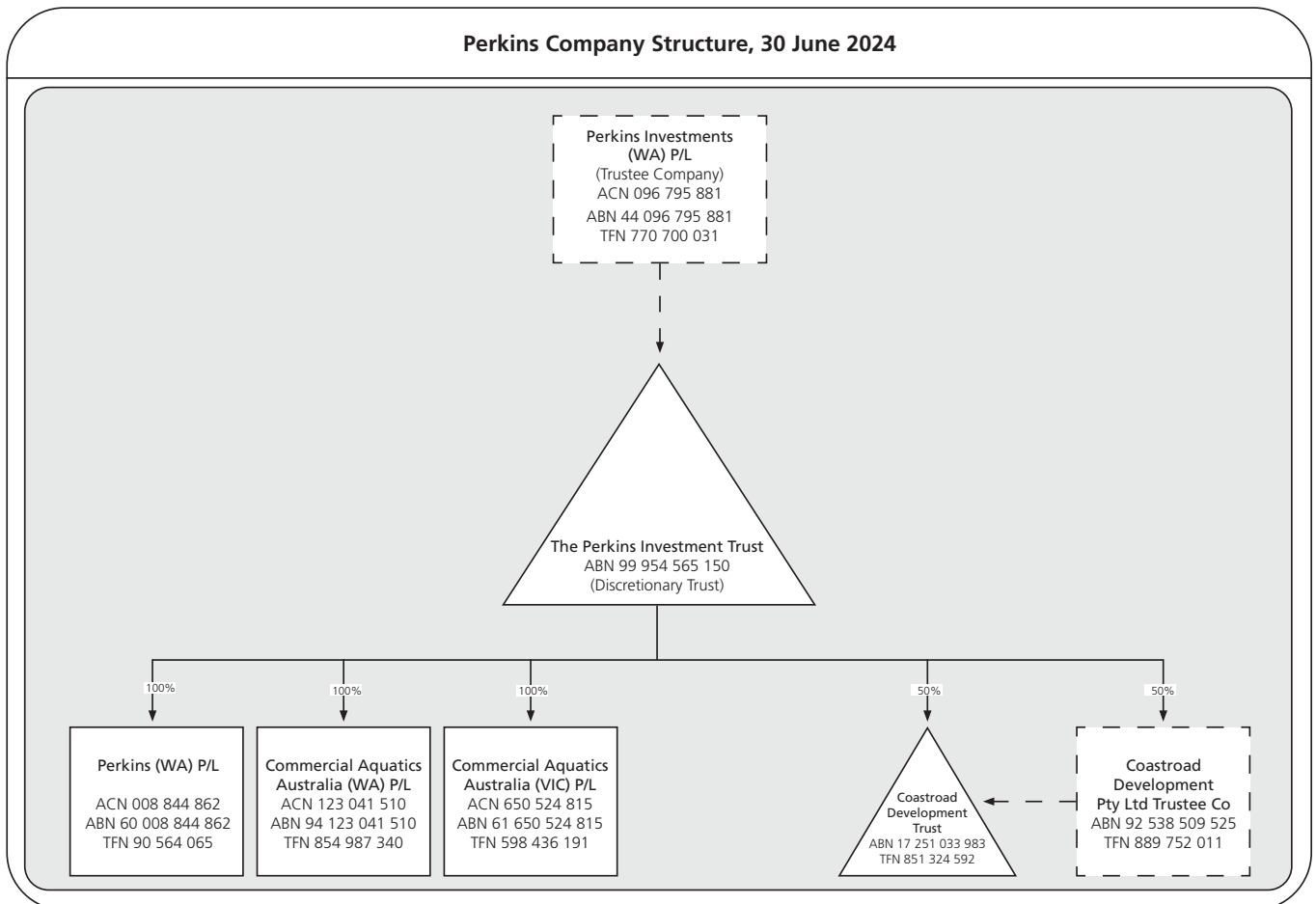


Figure 1: Organisational Chart for the 2023/2024 Financial Year.

## ORGANISATIONAL STRUCTURE, OPERATIONS, AND SUPPLY CHAINS

Perkins (WA) Pty Ltd is a private proprietary limited company, with its registered office and principal place of business located at 1 Hales Street, Davenport WA 6230.

Perkins (WA) Pty Ltd trades as Perkins Builders (Perkins), a commercial construction company, delivering commercial and industrial projects for Government, Industry and Private Developers primarily throughout the south-west and metropolitan areas of Western Australia. Recent works include Shire of Dardanup Library and Administration Building, Bunbury Regional Community College, Catholic Homes Belmont and Armdale Courthouse and Police Precinct.

### SUPPLY CHAINS

In our delivery of projects, Perkins engages, on average, 80 full time equivalent direct employees to complete project management, business development, administration, and minor manual construction activities. The majority of construction activities operate under a subcontract model, whereby Perkins manages a subcontractor and supplier workforce. On that basis, our supply chain arrangements include the following products and services:

- Construction Services – Trades and specialist services
- Supply Only – Hire or supply of goods and machinery
- Support Services – IT services, consultants, training providers, procurement services, accounting, and legal services.

### RISKS OF MODERN SLAVERY

Perkins acknowledges whilst the risk in the Australian workforce is low, constant pressure to maintain competitive pricing can drive modern slavery. Engagement with our subcontractors and suppliers ensures the importance of complying with Perkins' ethical requirements is understood and acknowledged by all entities.

The diversity of products and services provided by subcontractors and suppliers to Perkins can potentially expose Perkins to modern slavery risks in the supply chain, particularly at levels further down the supply chain. However, Perkins ensures all contracts are with entities based within Australia to mitigate this risk.

### ACTIONS TO ADDRESS MODERN SLAVERY

In response to the risks posed by Modern Day Slavery, Perkins developed and maintain a Modern Slavery Policy Statement and Whistleblower Policy Statement. These policies formalise Perkins' commitment to "take all necessary steps to ensure the development of moral and ethical practices in all our of our business dealings and relationships" and outline the responsibilities for Management and employees. The addition of both policies to the company business management system (BMS) ensures compliance through our auditing processes.

Within Perkins' recruitment processes for directly employed workers, steps are taken to mitigate the risk of modern slavery including:

- Equal Opportunity Employment practices; including right to work.
- Adherence to Modern Awards, Enterprise Agreements and/or the Fair Work Act (2009).
- Training in Worker's Rights and Workplace grievance mechanisms.
- Training on Modern Slavery and Trafficking/The Act.

All processes listed are subject to auditing to ensure compliance.

Perkins' Subcontractor and Visitor HSE Management Plan outlines the requirement for all subcontracted organisations to undergo a prequalification process relating to safety, quality, and legislative requirements, including adherence to Modern Slavery Act 2018.

Each project Perkins undertakes is subject to our Quality Management Plan outlining Perkins' Buy Local Policy; whereby Perkins requires all parties to maximise the amount of local direct labour as far as practicable within the local area, then Western Australia before outsourcing further to other Australian States.

The policy requires all goods and services are supplied from Western Australia as far as practicable, unless otherwise agreed with Perkins. Contractors and suppliers are made aware of these requirements during tender negotiations and asked to provide details of the source of labour goods/materials and any service associated with their scope of works prior to commencing work under the contract. Details are to be provided with every progress claim and submitted under the form of a statutory declaration.

Perkins review process ensures the requirements are being met and provides an opportunity for continual improvement.

## ASSESSING EFFECTIVENESS

Perkins' processes are governed by our internal business management system, which is subject to regular internal audits to ensure compliance. Bureau Veritas provides independent third-party auditing to Perkins to ensure compliance to the systems and maintenance of our accreditations.

Perkins' prequalification process ensures before any subcontractors are engaged, that the company complies with the Modern Slavery Act. If the company does not comply, Perkins will terminate any discussions relating to utilising the company and source a compliant alternative.

Quality audits completed by our internal quality department on each project ensure compliance with the prequalification processes, quality management plan and the Subcontractor and Visitor HSE Management Procedure. Findings are reported and any non-compliance issues dealt with as appropriate.

## CONSULTATION

The reporting entity, Perkins (WA) Pty Ltd T/A Perkins Builders does not own or control any other entities and therefore this criterion is not applicable.

## APPROVAL

This statement has been approved by Perkins Investments (WA) Pty Ltd as trustee for the Perkins Investment Trust and the reporting entity, Perkins (WA) Pty Ltd by Mr Daniel Perkins, Sole Director and Sole Shareholder.



Daniel Perkins  
Sole Director  
Perkins Investments (WA) Pty Ltd  
24th September 2024



## **MODERN SLAVERY POLICY STATEMENT**

### **COMMITMENT**

Perkins Builders believes that all persons are entitled to free choice and as such is committed to ensuring that all of our business operations are conducted in a way as to eliminate the exploitative practices of modern day slavery.

We are opposed to all forms of human trafficking, slavery, servitude, debt bondage, forced labour, child labour and deceptive recruiting for labour or services, and shall take all necessary steps to ensure the development of moral and ethical practices in all of our business dealings and relationships.

Our objective is to establish process and controls to ensure compliance with the Modern Slavery Act 2018 and eliminate the opportunity for exploitative practices.

### **MANAGEMENT RESPONSIBILITIES**

Management are responsible for the development, implementation and ongoing review of processes to eliminate exploitative practices in all of our business operations.

Training shall be provided to our employees to ensure a high level of understanding of the risks associated with the exploitative practices of modern day slavery.

### **EMPLOYEE RESPONSIBILITIES**

All employees shall undertake all practicable steps, to ensure that our standards are being implemented throughout our operations.

Where there is reason to believe or suspect that a conflict with, or breach of, this policy has occurred, or may occur in the future the employee shall notify their relevant Manager as soon as possible.

### **CONSULTATION**

All Perkins Builders employees have a responsibility to participate in the detection, prevention and reporting of instances where this policy may be in breach.

**Managing Director**  
30<sup>th</sup> June, 2024



## WHISTLEBLOWER POLICY

### INTRODUCTION

Perkins is committed to ensuring that all of our business is conducted in an honest and ethical manner. Perkins has a desire to establish and nurture a culture where employees and other workers can raise concerns regarding any serious wrongdoing (including unethical, illegal, corrupt or other inappropriate conduct) without being subject to victimisation, harassment or discriminatory treatment.

This policy aims to:

- Encourage employees and workers to report an issue in good faith if they genuinely believe an employee or worker has engaged in serious wrongdoing;
- Set out avenues available to employees and workers to report serious wrongdoing to Perkins; and
- Outline how Perkins will deal with all reports of serious wrongdoing.

### WHO THE POLICY APPLIES TO

This Policy applies to employees, Directors, officers, contractors, suppliers and consultants of Perkins.

### RESPONSIBILITY TO REPORT

Perkins relies on its employees and workers to help maintain and grow its culture of honesty and the highest ethical behaviour. If an employee witnesses serious wrongdoing, they should report the matter to a Protected Disclosure Officer.

Reportable matters include any conduct that involves:

- Fraudulent activity;
- Illegal activities (including theft, dealing in or use of illicit drugs, violence or threatened violence and criminal damage against property);
- Unethical behaviour that would breach the Perkins Code of Conduct;
- Any behaviour that poses a serious risk to health and safety of any person in the workplace;
- Bullying or behaviour in which intends to intimidate another person;
- Behaviour not consistent with Perkins values and culture;
- Dishonest behaviour;
- Participation in activities that jeopardises Perkins corporate image and reputation;
- Unlawful, corrupt or irregular use of company funds or services;
- Behaviour which is oppressive, discriminatory or grossly negligent;
- A serious risk to public health, public safety or the environment; or
- Any conduct which may cause loss or detriment to the interests of Perkins.

Issues relating to Human Resources and Industrial Relations are to be managed via the Human Resources Management Plan and Industrial Relations Management Plan; Safety Incidents should be reported via the Incident Report Form in accordance with the Incident Reporting Analysis and Corrective Action Procedure and should be excluded from this Policy.

### MANAGEMENT RESPONSIBILITIES

Protected Disclosure Officers are assigned within the business to manage any report of serious wrongdoings and ensure prompt action is taken to investigate reports made under this Policy. An investigation will be conducted in a fair and independent manner and all reasonable efforts will be made to maintain the confidentiality of an investigation.

A Whistleblower who makes a report in good faith in accordance with this Policy will not be discriminated against, victimised, harassed, dismissed, demoted, disadvantaged or prejudiced in their employment or engagement with Perkins even if the report is subsequently determined to be incorrect or unsubstantiated. However, this Policy will not protect a Whistleblower if they are involved or connected to the improper conduct or illegal activity.

**Managing Director**  
30<sup>th</sup> June, 2024