



MODERN SLAVERY STATEMENT 2023

INTERMAIN GROUP

November 2023

INTERMAIN

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We acknowledge the Traditional Owners of country throughout Australia and recognise their continuing connection to land, waters and culture.

We pay our respects to their elders past, present and emerging.

Intermain is committed to building, valuing and promoting diversity and inclusiveness.



A STATEMENT FROM THE CEO/MD

We are proud to say that we reject modern slavery in all its forms across our business and supply chain, and this latest statement embodies our continuing commitment to our mission to become Australia's most socially responsible builder.

Our previous statement elevated our commitment to collaborate with our internal and external stakeholders to address our modern slavery risks and improve our processes to identify, assess and manage risk in our supply chain.

As we move forward, we will continue to focus on collaborating with our internal and external stakeholders to address our modern slavery risks through the ongoing management of our vendor portal, enhancement in modern slavery training and taking action to hold stakeholders to account for non-compliance.

We are pleased to publish our Modern Slavery Statement 2023, which outlines our approach to address and minimise the risk of modern slavery in our business operations and supply chains.

Andrew Johnson
Chief Executive Officer & Managing Director

The Board of Andrew Johnson Holdings Pty Ltd has approved this statement on 28 November 2023

01. ABOUT INTERMAIN

Established in 2001, Intermain including each of its entities, and associated entities, is one of Australia's leading multi-skilled commercial fitout companies. Intermain delivers thoughtfully considered, beautifully designed, functional spaces for a wide range of clients; from corporate offices to heritage, government and educational environments. As part of our national practice, we are firmly committed to conducting business with the highest integrity and in compliance with the letter and spirit of the law.

In 2018, the Australian Government passed the Modern Slavery Act No. 153, 2018 ('the Act'), that requires large corporations in Australia with turnover in excess of \$100 million, to annually report on the risks of modern slavery in their operations and supply chains, and actions taken to address those risks.

For the purposes of the Act, Intermain's 1st modern slavery statement was submitted on 31 March 2021 for a Single Reporting entity, Andrew Johnson Holdings Pty Ltd, ABN 54 089 200 448 and in accordance with Section 13 of the Act. Intermain's 2nd modern slavery statement for the period ending 30 June 2022 was submitted on 21 December 2022.

This is therefore Intermain's 3rd Modern Slavery statement, submitted for the period ending 30 June 2023, which serves to demonstrate our processes, frameworks and policies in relation to managing modern slavery risks and our continued efforts to meet our obligations under the Act.

The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. The worst forms of child labour means situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

Intermain continues in our efforts to achieving a zero-tolerance approach to Modern Slavery, and we are committed to consistently reviewing and strengthening our processes and systems, to minimise the risk of human rights infringements anywhere in our supply chain. We provide further details on this later in this statement, when reporting on actions taken by Intermain to assess and address modern slavery risks, during the past financial year.

The Intermain Group includes:

Intermain Pty Ltd	ABN 62 096 189 623
Intermain WA Pty Ltd	ABN 91 165 551 646
Intermain Queensland Pty Ltd	ABN 47 158 180 459
Intermain Victoria Pty Ltd	ABN 73 158 142 495
Intermain ACT Pty Ltd	ABN 43 632 187 592
Intermain SA Pty Ltd	ABN 73 648 554 161
Intermain Joinery Pty Ltd	ABN 25 601 801 021
Andrew Johnson Holdings Pty Ltd	ABN 54 089 200 448 (hereinafter referred to as 'Intermain').

The **Modern Slavery Act 2018** defines modern slavery as including eight types of serious exploitation:

- 1** Trafficking in Persons
- 2** Slavery
- 3** Servitude
- 4** Forced Marriage
- 5** Forced Labour
- 6** Debt Bondage
- 7** Deceptive Recruitment
- 8** Child Labour & Slavery



*Refer to www.legislation.gov.au/Details/C2018A00153

02. INTERMAIN'S STRUCTURE OPERATIONS AND SUPPLY CHAINS

Intermain has four offices in Australia and our headquarters are in Sydney. Intermain employs approximately 140 full time staff. In addition, Intermain has a large pool of trusted, highly skilled Subcontractors. For each project, we assemble just the right team for the job – engaging designers, builders, specialist trades and consultants as required. We take pride in how we treat our people, and believe that these respectful relationships result in a team that is committed, reliable and a pleasure to have onsite.



Our employees' safety and wellbeing are of pivotal importance, and we do whatever we can to keep our people healthy and happy. We aim to hire and retain the very best people, provide them with a balance of stimulation and security, and create a working environment that is inclusive and supportive. We also place great emphasis on education and training – keeping staff up to date with work health and safety regulations and environmental awareness programs, and keeping an eye on our ongoing compliance by conducting regular site inspections.

SAFETY

Our accountability includes, protecting the safety of our people onsite, which is non-negotiable, and Intermain is proud to have a strong record in this area.

INFORMATION EXCHANGE

Our company is listed on the International Compliance Information Exchange, which makes compliance checks quick and easy.

DEDICATED SYSTEMS & HSEQ

We have a dedicated Business Management System and HSEQ team ('HSEQ team'), who reviews site risk assessments and performs random site audits to achieve our objective of zero-harm.

WHS

Intermain have WHS processes that require completion of risk assessments, hazard management and emergency management. All subcontractors are required to supply Safe Work Method statements for high-risk works before starting onsite.

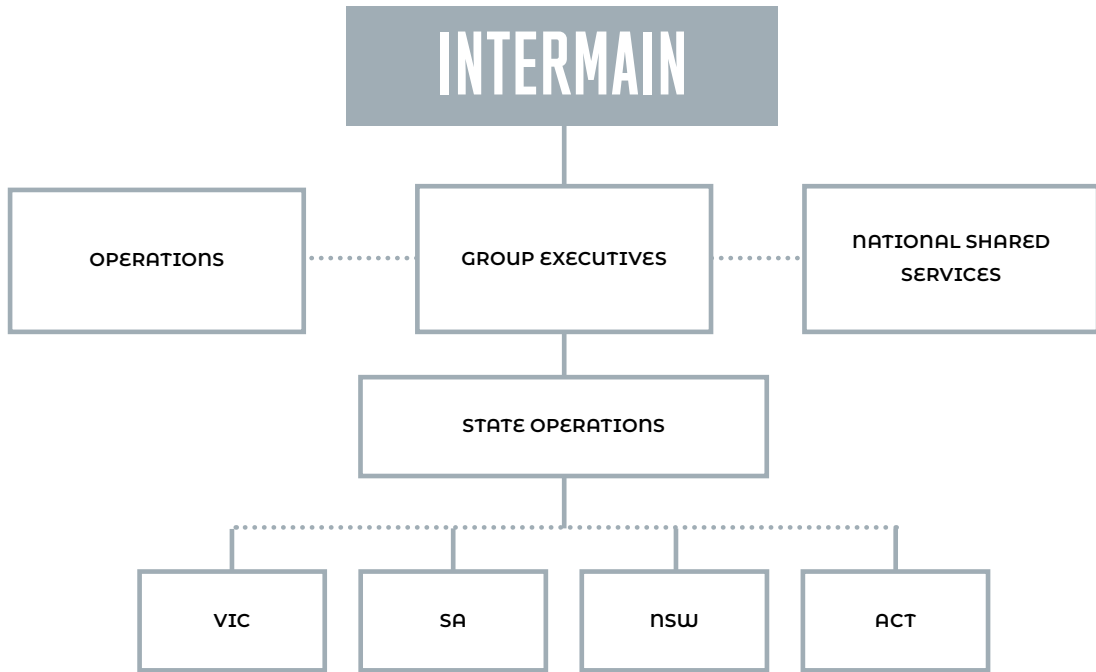
MODERN SLAVERY

Intermain has extended our accountability to ensure our business and our people are aware of the risks of modern slavery in our operations and supply chains, and actions taken by Intermain to address these risks. We aim to be equally proud in ensuring our compliance with modern slavery requirements.

GROUP STRUCTURE



ORGANISATION STRUCTURE



The responsibility for managing and ensuring compliance in our operations and supply chain rests with our Chief Operations Officer and BMS/HSEQ Officer, who are based in our Sydney office.



140+ EMPLOYEES



4 OFFICES NATIONALLY

Intermain provides fitout, refurbishments, joinery and building services across a diverse range of industry sectors, including:



COMMERCIAL



INDUSTRIAL



GOVERNMENT



EDUCATION



HEALTH & AGED CARE



RE-USE & HERITAGE

03. RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS OF INTERMAIN

Intermain is committed to the highest standards of ethics and business integrity in our operations and supply chain. We aim to ensure our staff and suppliers are treated fairly, with respect and dignity, in order to uphold the said highest standards.

Intermain's foremost risk of modern slavery in our operations and supply chain, vests in our Subcontractors, who perform the required design, build, trades and project management related services, during the implementation and delivery of our projects. All Subcontractors are required to comply with our Subcontractor Management procedure; being a formal documented process, which ensures: subcontractor engagement uniformity and standardisation, that is subject to on-going monitoring, review and improvement. Subcontractors are carefully vetted to ensure they align with our legal and contractual obligations.

Similarly, our high ethical standards are at the core of how we engage with our Subcontractors and reflects how we work as an organisation.

We have considered the Modern Slavery List of Industries and List of High Risk Countries, as provided for in The Global Slavery Index 2018, in determining our risks of modern slavery in our operations and supply chain.

We have further considered information and resources made available through organisations that includes: the Transparency International Corruption Perceptions Index; Global Contact Network; Global Estimates of Modern Slavery 2017; 'Hidden in Plain Sight', Report of the 2017 Parliamentary Inquiry into establishing a Modern Slavery Act in Australia; and the Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities.

We understand that our subcontractors source the vast majority of the goods and services within Australia, whilst the balance is predominantly sourced from countries with a low risk of modern slavery, which includes the USA, Singapore, New Zealand and Germany. There have been no further risks of modern slavery identified within our supply chain in the past financial year.

Locally based, we have identified four areas of high risk to modern slavery within industries, goods and/or services, amongst our subcontractors, namely:



ELECTRICAL EQUIPMENT



ELECTRONIC EQUIPMENT, INSTRUMENTS, AND COMPONENTS.



IT SUPPLIES AND SERVICES



PEOPLE SERVICES

04. ACTIONS TAKEN BY INTERMAIN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

In 2020, Intermain working in consultation with a third party consulting firm, conducted a modern slavery risk assessment of our operations and supply chain, creating a modern slavery framework, which assisted us in the preparation of our first modern slavery statement.

We again engaged the consulting firm to assist us with meeting our modern slavery requirements in 2022 and 2023. The process was driven and headed by our Chief Operating Officer, supported by our internal Systems Administrator/Business Analyst, responsible for our creditors, and our HSEQ Compliance Manager, responsible for amongst others related: policy development; conducting risk assessments; training; conducting frequent inspections and site visits; and implementing preventative, detection and monitoring processes.

The assessment comprised two elements:

1. Reviewed existing risk management policies and procedures within Intermain and determined whether this can be further broadened to include additional risks of Modern Slavery, through ethical sourcing, quality standards or other compliance reporting.

2. Conducted a 2nd modern slavery risk assessment over our current suppliers in terms of our payment data, for a 12-month period 1 July 2022 to 30 June 2023. Our top 50 spend suppliers had changed significantly over the past financial year, that necessitated the assessment, which was first performed in 2021, to be completed again in 2023. The primary reasons for this was that in 2022 and 2023, we took on some large industrial type jobs, which were different to our usual core business. With this came the need for different suppliers with larger costs. This skewed / distorted the supplier spend reporting for the period under review and also that with a change in project staff, new suppliers were introduced due to their existing relationships.

WE CONDUCTED A DESK TOP REVIEW OF 50 OF OUR TOP SPEND SUPPLIERS.

THE RESULTS OF OUR DESK TOP REVIEW IDENTIFIED THAT THE 2 OF THE 50 SUPPLIERS SCORED AN OVERALL MODERN SLAVERY RISK RATING OF MODERATE RISK, WHILST THE REMAINING 48 OF THE 50 SUPPLIERS RECORDED AN OVERALL MODERN SLAVERY RISK RATING OF LOW RISK. THIS IS BASED ON WHAT WAS DETERMINED BY US USING PUBLICLY AVAILABLE RECORDS AND INFORMATION WE HAD PREVIOUSLY OBTAINED FROM OUR SUPPLIERS.



In conducting a risk assessment of existing risk management policies and procedures, we reviewed all relevant policies including: Internal Audit; Subcontractor Management; Consultant Prequalification; Vendor Application; Purchasing- Hiring Materials & Equipment; Industrial Relations; Recruitment; Standard Terms of Employment; Offer of Employment; Code of Conduct; Appropriate Workplace Behavior; and Grievance's procedure.

We updated a number of these policy documents to make reference to and include the requirements of the Act. We further developed a Modern Slavery policy, Whistleblower policy and a Supplier Code of Conduct that makes provision for modern slavery.

In performing the modern slavery risk assessment of our suppliers in 2023, we conducted a desk top review of 50 of our top spend suppliers, that comprise approximately 70% of our total spend, the majority of whom are Subcontractors. Prior to conducting the said risk assessment the ABN number and ABN listed name for each of the 50 suppliers was confirmed from ASIC public records. No inconsistencies or anomalies were identified.

Intermain considered risks that may potentially cause, contribute to or be directly participating in modern slavery practices, consistent with the Act and the Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities. These risks areas included:

1. Financial
2. Industry
3. Country (geographic location)
4. The use of subcontractors
5. Evidence that the supplier has submitted a modern slavery statement, where applicable

The results of our desk top review identified that the 2 of the 50 suppliers scored an overall modern slavery risk rating of moderate risk, whilst the remaining 48 of the 50 suppliers recorded an overall modern slavery risk rating of low risk.

This is based on what was determined by us using publicly available records and information we had previously obtained from our suppliers.

At the commencement of our modern slavery reporting, as recorded in our 1st modern slavery statement, we created a vendor portal, which at that stage was still in its infancy. The said portal makes provision for use by Suppliers, Subcontractors and Consultants who wish to engage with Intermain. It includes a modern slavery questionnaire, that contains probing rather than generic modern slavery questions, which also provide for a risk rating for each relevant modern slavery question, and the submission of supporting documents to us where applicable. We believe this is a vital step in identifying, and where applicable, eradicating human trafficking and modern slavery, where there is any indication or slightest suspicion that this may be occurring.

We have progressed the vendor portal and specifically the modern slavery questionnaire. We confirm that the completion of the modern slavery questionnaire is a mandatory requirement for approval in our vendor portal.



As of 30 June 2023, 2,094 modern slavery questionnaires have been completed on our vendor portal. Of these 1,189 questionnaires have been approved, whilst the balance are in various stages of review by us. This includes 536 vendors, whose status is deemed to have automatically expired, meaning that an expiry date (such as insurances) on the vendor record has been reached and the system has auto expired the record to indicate it needs to be updated. The vendor must update expired content to be re-approved. The following status exists with respect to the balance of suppliers on the vendor portal:

- Archived - 98
- Denied - 37
- Revoked - 21
- Pending - 51
- In progress - 162

During the prior review stage, which is still currently on-going, we identified 3 vendors whose answers to the modern slavery questionnaire resulted in a potential overall risk of modern slavery, as their answers indicated risks of modern slavery. These vendors scored >8 out of 21 weighted questions answered. We communicated with these 3 vendors and determined that they had misunderstood some of the questions. This was rectified and adjusted, resulting in the risk of modern slavery being reduced to an acceptable level.

A score of 0 out of 21 would indicate no risk of modern slavery had been identified. We further identified several vendors whose overall risk of modern slavery was low (below 8 out of 21 weighted questions answered), but who provided adverse answers to specific modern slavery questions. These answers were followed up with the vendors, where necessary, to determine that they understood the questions and in order to obtain additional information and context, for further assessment.

For the period ending 30 June 2023, 33 vendors were identified as having unacceptable initial answers to the high risk modern slavery questions.

After further investigation this was reduced to 3 vendors, and we took the following actions:

- WHS/BMS Administrator emailed each supplier/ subcontractor multiple times, in order to provide them with an opportunity to respond.
- No response was received, which resulted in the vendors being archived from the portal and made inactive on our Jobpac; which is an integrated accounting, project management, human resource and payroll software solution for the Australian construction and engineering sector.



05. ASSESSING THE EFFECTIVENESS OF ACTIONS TAKEN BY US

We have described our actions taken in the immediate assessment of modern slavery risk within our operations and supply chain. This includes our initial policy review, drafting of new policies and a risk assessment for our high spend suppliers, the latter has been completed in 2021 and again in 2023.

In doing so Intermain has mapped out key parts of operations and supply chains to improve understanding of potential modern slavery risks.



VENDOR PORTAL

All new and existing suppliers, subcontractors and consultants are vetted for modern slavery risks through our vendor portal, the completion of a questionnaire that incorporates modern slavery requirements and the provision of supporting documents where applicable. The portal is now a prerequisite/precondition to the establishment of new suppliers.

Intermain aims to continue to use the portal and information obtained from this, to build transparent and collaborative relationships with suppliers and will further ensure that our expectations of reporting of modern slavery risks within the supplier's supply chain has been clearly communicated to us, and that we have satisfied ourselves that modern slavery risks have been effectively managed. This is evident in the actions we have taken, as described and reported on in section 4 of the statement above.



POLICY REVIEW

We continue to review our policies that now incorporate and make provision for modern slavery compliance and ensure that Intermain staff and Suppliers where applicable, certify that they have read and understand these policies, on an annual basis. We will regularly review and improve our modern slavery internal controls and procedures in order to monitor their effectiveness and respond to areas that are not. Where required, this will include updating policies and procedures.



06. THE PROCESS OF CONSULTATION WITH ANY ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS

The Intermain Group is centrally controlled and managed from Sydney by a tightly held group of shareholders of the ultimate holding company Andrew Johnson Holdings Pty Ltd. Modern Slavery requirements were discussed with this management group and a sub-committee was formed to work with a third party consulting firm to develop our modern slavery framework. All new and enhanced policies were tabled for approval to the management team and all policies are rolled out to all companies within the group and business units simultaneously. All existing staff within the Intermain group have undertaken modern slavery training and feedback was encouraged.



This training is now incorporated into our new employee induction onboarding process, and continues to be an induction requirement for all employees. The COO & HSEQ Compliance Manager have attended webinars throughout the past year to keep abreast of any changes.

07. OTHER RELEVANT INFORMATION - THE WAY FORWARD FOR INTERMAIN

In order to build on the modern slavery framework we have established to date, we will continue to focus on the following areas, where we have obtained a reasonable amount of success, and we aim to build further in these areas:

01.

Continued management of our vendor portal, that includes review and evaluation of the modern slavery questionnaire and conduct further follow up enquiries with vendors where deemed necessary. This is an on-going process.

02.

Further enhancement of our modern slavery training to our staff and the continued involvement of our COO & HSEQ Compliance Manager, in the training programs.

03.

Continued development of our internal accountability standards and procedures, and where required hold our employees and contractors accountable for non-compliance with our standards on modern slavery and human trafficking. We have as reported earlier in this statement held vendors accountable for not responding to our administrative modern slavery requirements, which resulted in the vendors being removed from our supplier process and supply chain.

Intermain

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