

pitt&sherry's Modern Slavery Reporting 2020-2021 Financial Year

Introduction

This Modern Slavery Statement is made by, of Pitt & Sherry (Operations) Pty Ltd (ABN: 67 140 184 309), a voluntary reporting entity under the Australian Modern Slavery Act 2018 (Cth), and its subsidiaries (collectively, pitt&sherry, we or us) for the year ended 30th June 2021 (FY21).

pitt&sherry is committed to ethical, sustainable, and socially responsible procurement. We are a company that strives to demonstrate leadership and endeavours to act with integrity. The health, safety and wellbeing of our people, our clients and their families is always our priority. pitt&sherry has made a commitment to support the Ten Principles of the United Nations Global Compact on human rights, labour, environment, and anti-corruption. This includes a commitment to work towards addressing the risk of modern slavery in our operations and supply chain and voluntarily reporting under the Act.

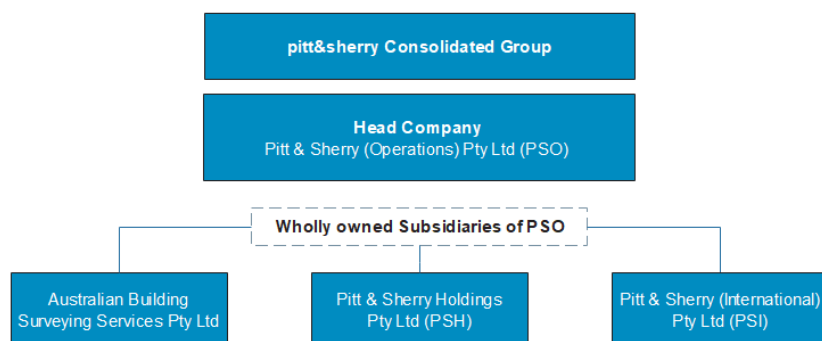
The term "modern slavery" as defined by the Act is used to describe situations where coercion and/or threats of deception are used to exploit victims and undermine or deprive them of their freedom. We recognise the importance of combating slavery and human trafficking; and are entirely opposed to such abuses of an individual's freedoms.

The purpose of this statement is to outline what we are doing to support the global aim to combat modern slavery within supply chains over the course of FY21, with our intention to demonstrate continuous improvement in further reporting periods.

This statement covers the activities of the pitt&sherry group of companies, which comprises of Pitt & Sherry (Operations) Pty Ltd (ABN: 67 140 184 309) together with its wholly owned subsidiaries, Australian Building Surveying Services Pty Ltd, Pitt & Sherry Holdings Pty Ltd and Pitt & Sherry (International) Pty Ltd (PSI). For the purpose of this statement, the group of companies will be referred to as "pitt&sherry".

Our structure, operations, and supply chain

Our Structure



Pitt & Sherry (Operations) Pty Ltd is a privately-owned company with its registered office located in Launceston, Tasmania. Any information or statements in relation to the Act apply to the operations and suppliers of Pitt & Sherry (Operations) Pty Ltd, including its subsidiaries.

Our Operations

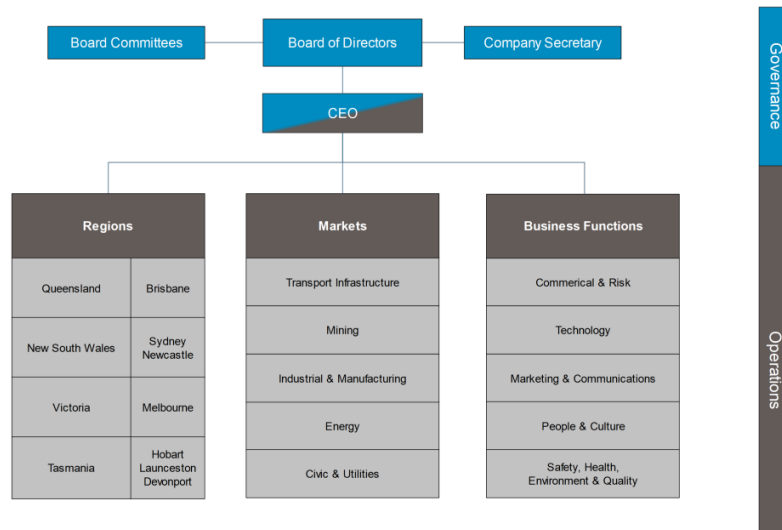
Pitt & Sherry (Operations) Pty Ltd trading as pitt&sherry is a leading Australian professional services company, founded in 1963 currently employing approximately 300 people in its offices in Victoria, Tasmania, New South Wales, and Queensland. pitt&sherry is a consulting engineering firm which undertake activities such as engineering, environmental consulting, advisory and project management services.

There are five key sectors in which pitt&sherry undertake these activities: Transport Infrastructure, Industrial & Manufacturing, Mining, Energy and Civic and Utilities. Further, Australian Building Surveying Services Pty Ltd trading as pitt&sherry Building Surveying, employing 14 staff, offers a range of building surveying services including certification of domestic and commercial buildings and essential service management. As an organisation of committed professionals, we value integrity, courage, creativity, accountability, sustainability and the relationships we form with our clients, employees, communities and shareholders.

For further information about pitt&sherry's business, including its brands and subsidiaries, see

www.pitt&sherry.com.au

Organisational Structure - Pitt & Sherry (Operations) Pty Ltd



Our Supply Chain

pitt&sherry has a large and diverse supply chain of goods and services across Australia and to a lesser extent, globally ranging from local sub-contractors, local distributors of goods to global distributors and manufacturers. The bulk of overseas-sourced material/equipment is procured through local distributor networks, not directly from the manufacturer.

We have procured services from numerous suppliers throughout FY21 for services to support our operational requirements for example:

- Subconsultants and subcontractors:
 - i.e., engineers, surveyors, drillers, and various other specialist subconsultants, lawyers, and other specialist advisory services
- Goods and services to support our office environment:
 - i.e., ICT support (software and hardware), lawyers, and other specialist advisory services, office cleaners, professional memberships, office supplies (furniture and stationery), catering services, PPE, and corporate clothing
- Goods and services to support our site-based work:
 - i.e., equipment and clothing/uniforms, vehicles, ICT support (software and hardware), and accommodation facilities.

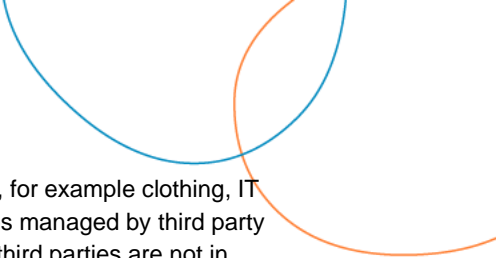
Ninety-nine per cent of our suppliers are from within Australia.

Modern Slavery Risks across our operations and supply chains

In FY21, we undertook a review of the potential risk of modern slavery practices across our operations and supply chains. During the assessment process, we considered risks in pitt&sherry operations as well as amongst our top 20 highest dollar figure spend suppliers that may possibly cause, contribute and/or be directly linked to modern slavery practices. For our top 20 highest dollar figure spend suppliers risk factors such as the sector, industry, types of products and services, geographic locations and entity associations were considered.

These processes have been undertaken to build an informed Risk Matrix which will identify pitt&sherry's initial priorities and assist in our ongoing continuous improvement.

As a result of this analysis, pitt&sherry are aware of potential risk areas, such as a local supplier sourcing a product from overseas sources which may have a record of having modern slavery practices still in place.



pitt&sherry recognises that items we purchase are known to be at particularly high risk, for example clothing, IT hardware, and construction materials. In addition, we have identified the use of services managed by third party providers such as contractors and labour hire providers may be a potential risk area if third parties are not in compliance with workplace legislation and standards.

Actions Taken

pitt&sherry has zero tolerance for any form of slavery-like practices and the following actions have been taken in FY21.

Our policies and procedures

pitt&sherry has numerous policies and procedures in place that aim to provide checks and balances within our business. Whilst pitt&sherry does not have a standalone Human Rights Policy all our policies and procedures have been reviewed by internal staff members and consultants in FY:21 and have been cross-checked with the 10 Principles in the UN Global Compact (UNGC). Where applicable, amendments have been made to our policies to ensure alignment with the UNGC to promote human rights within our company.

We also identified the need for a Supplier Code of Conduct to communicate to our suppliers our commitment to ethical, sustainable, and socially responsible procurement, along with our commitment to combatting modern slavery. A Supplier Code of Conduct has been drafted and outlines our expectations of suppliers in relation to modern slavery, among other key components of responsible procurement and is on our website. Our Contracts Helpdesk Team have drafted contractual obligations that have been included in our supplier contracts to minimise the risk of modern slavery in our operations and supply chains.

Training and awareness

Training has been provided to all employees by way of Go1 training module “Modern Slavery Act Awareness”.

Identification and Assessment of potential risks in our operations and supply chains

pitt&sherry provides fair and safe working conditions for all its employees. We expect the same standards from our suppliers, contractors, and labour hire providers. Our supplier contracts also include language stipulating that supplier agree to adhere to our policies and standards and our Supplier Code of Conduct.

Over the course of the FY21, we have focused on supplier identification and investigated potential risks from our top 20 highest dollar figure spend suppliers in our supply chains. Our supplier identification and assessment methodology that we have developed in FY21 enables us to categorize and determine where further assessment and addressing of modern slavery risks need to occur.

Of the top twenty suppliers investigated in FY21, three were identified as potential high risk and further investigation of these suppliers is intended in FY22. Our ongoing process has and will continue to include:

- A methodology for supplier identification, assessment & engagement
- Review of our entire list of suppliers to determine no/low risk and potential high-risks suppliers within our supply chain. In doing this we have considered sector and industry risks, product and services risks and geographic risks per the Acts guidelines; and
- Identification of areas of no or low risk, acknowledging that while low/no risk is presented, there should be ongoing due diligence to ensure this is accurate year to year.

Incident reporting and remediation

Our Supplier Code of Conduct provides that all suppliers are required to monitor their compliance with the Code and notify us of any investigation into non-compliance by authorities and of any material breaches of the Code. Suppliers are also expected to report any suspected violations of regulations and laws applicable to either to a senior manager at pitt&sherry or to our external reporting whistle-blower service.

Further, we have reporting procedures and mechanisms where employees and third parties can report any concerns, including in relation to modern slavery.

In FY21, we did not receive any reported modern slavery concerns, nor did we identify any instances of modern slavery in our operations or supply chains

Assessing Effectiveness

pitt&sherry's Modern Slavery Framework represents our commitment to addressing modern slavery risks in our operations and supply chain. We are committed to further developing our understanding of how best to measure the effectiveness of the processes we introduced in FY21.

Going forward our SHEQ Manger and other key resources in the business will review the effectiveness of our processes as we endeavour to be a company that is committed to ethical, sustainable, and social responsibility, who meets corporate responsibilities and aims for responsible procurement with measures such as:

- Supplier assessments, and how they are conducted, integrated with procurement processes
- Annual review of procurement contractual templates, including our modern slavery provisions
- Annual evaluation of the effectiveness of our policies and procedures on managing modern slavery risk
- Communications to further foster modern slavery awareness
- Assessment of the effectiveness of our training modules for increasing understanding of modern slavery; and
- Working closely across pitt&sherry to gather data about conditions on the ground in places where our goods & services are produced.

Consultation

The development of this Statement and the steps outlined involved consultation with key staff, management, executives of pitt&sherry. Our Legal team and other key members of the company has had responsibility to oversee the development and implementation of the modern slavery framework, activities and plans. Moving forward our Safety, Health, Environment and Quality (SHEQ) Manager will drive our continuous work on mitigating modern slavery and other key members of the company will support the ongoing work.

The focus in our ongoing process this year has been designing a Modern Slavery Management Framework that includes action plans and future goals for adopting strategies for addressing identify modern slavery risks. This is an evolving document and includes future development and implementation of appropriate remediation measures and development of a methodology for continuous improvement and embedding ongoing and periodic due diligence and reviews.

Future commitments

Over the course of FY22, we will strive to:

- Further embed modern slavery considerations, including the broader corporate responsibility strategy, in our policies to ensure a continued positive culture towards this issue Our aim is to create an enhanced understanding of modern slavery risks within our business operations and supply chains
- Utilising our evolving framework and methodology to adopt strategies for addressing identified modern slavery risks
- Further develop and implement appropriate remediation measures to assist with supporting the compliance of our suppliers
- Continually review policies and procurement procedures for effectiveness and to ensure our suppliers are monitoring their supply chains for modern slavery risks
- Continually monitor and review the effectiveness of our processes, methodology and policies and procedures
- Increase internal stakeholder communications on this issue, including promoting awareness on modern slavery principles; and
- Expand modern slavery awareness training to all staff with procurement responsibility.

This Statement is approved by the Board of Pitt & Sherry (Operations) Pty Ltd.

Benita Husband
Chief Executive Officer
Pitt & Sherry (Operations) Pty Ltd