



MODERN SLAVERY STATEMENT 2024

December 2024

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.

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 2024, which outlines our approach to address and minimise the risk of modern slavery in our business operations and supply chains.

A handwritten signature in black ink, appearing to read 'Andrew Johnson', positioned above the printed name.

Andrew Johnson

Chief Executive Officer & Managing Director

The Board of Andrew Johnson Holdings Pty Ltd has approved this statement on 4th December 2024

01. ABOUT INTERMAIN

Established in 2001, Intermain including each of its entities, and associated entities, is one of Australia's leading multi-skilled commercial fit-out 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. We subsequently submitted further statements for the periods ending 30 June 2022 and 30 June 2023.

This is therefore Intermain's 4th Modern Slavery statement, submitted for the period ending 30 June 2024, 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. We have adopted a pro-active approach that has facilitated the process.

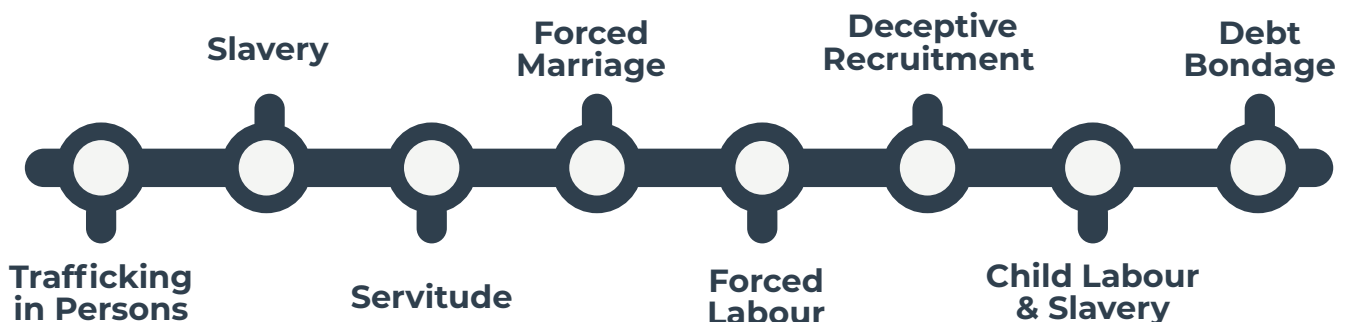
The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. The worst forms of child labour means situations 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:



02. INTERMAIN'S STRUCTURE OPERATIONS AND SUPPLY CHAINS

Intermain has four offices in Australia and our headquarters are in Sydney. Intermain employs approximately 113 full time staff (at 30 June 2024). 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.

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.

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.

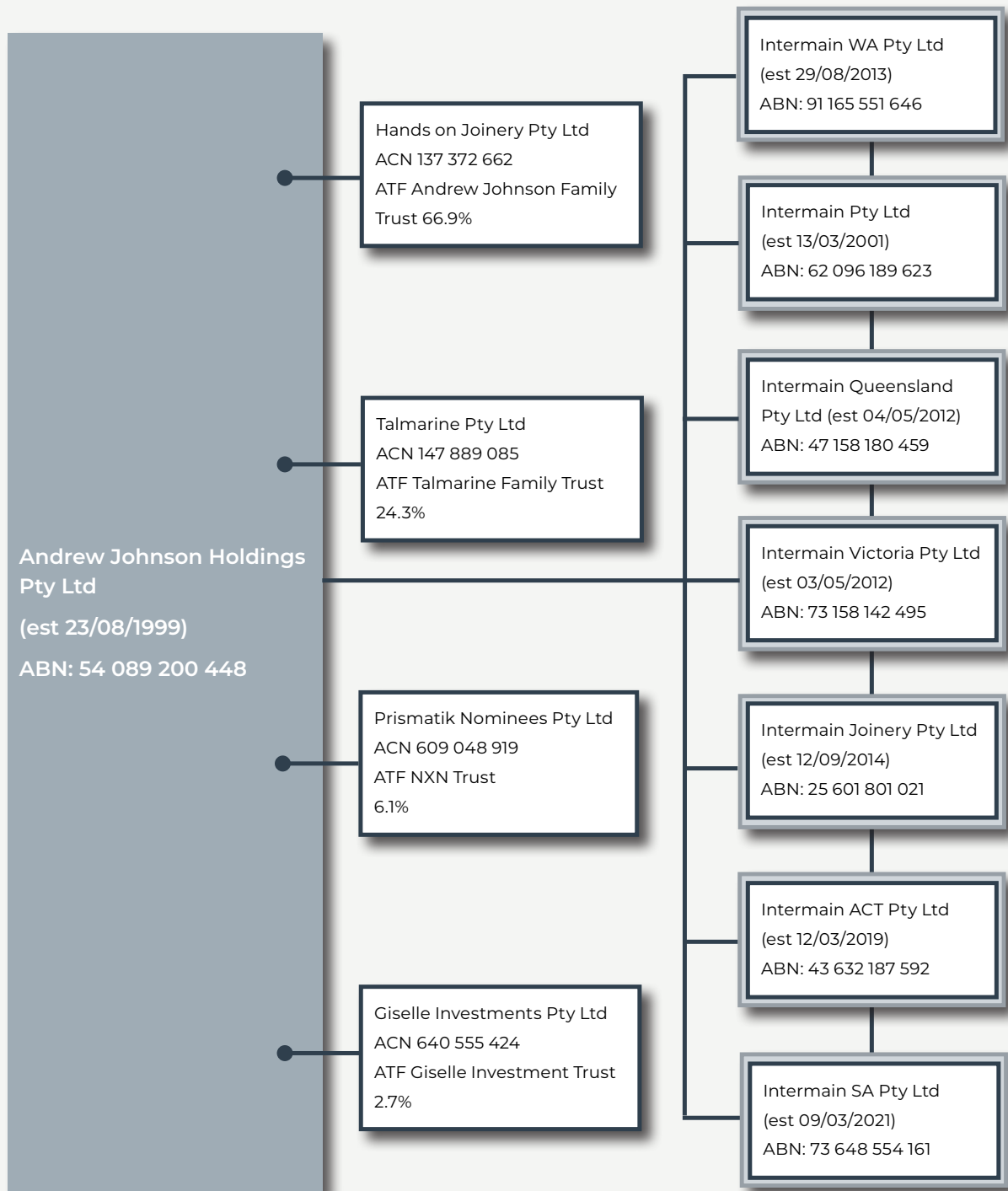
WHS

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.

DEDICATED SYSTEMS & HSEQ

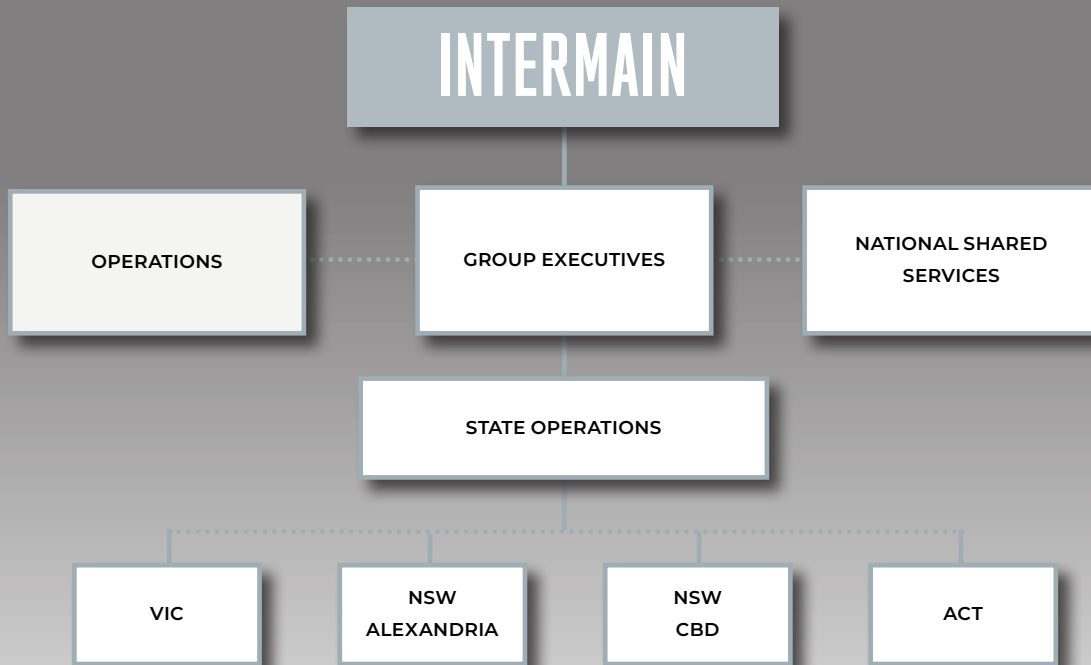
We have a dedicated Business Management System and HSEQ team ('HSEQ team'), who reviews site risk assessments and performs random site audits to achieve our objective of zero-harm.

GROUP STRUCTURE



Each entity listed above is a wholly owned, subsidiary of our parent company Andrew Johnson Holdings Pty Ltd. These entities all operate under the same policies, procedures, plans and integrated management system governed and managed by the Intermain Board of Directors, our Management Team and our Senior Leadership Team.

ORGANISATION STRUCTURE



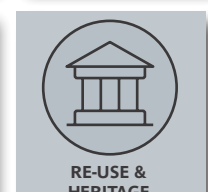
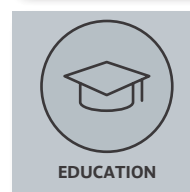
The responsibility for managing and ensuring compliance in our operations and supply chain rests with our Chief Operations Officer (COO) and HSEQ Compliance Manager, who are based in our Sydney HQ office. The on the ground managing and ensuring compliance with modern slavery, is the responsibility of our delivery staff.



113+

Employees Nationally

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



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 international human rights standards, including:

- The Universal Declaration of Human Rights.
- Meet or exceed all local human rights legislation.
- Ensure minimum wage, hours, benefits and holidays.
- Support freedom of association.

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. 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 include: the Transparency International Corruption Perceptions Index; Global Contact Network;

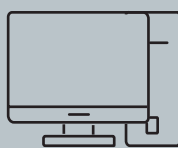
Global Estimates of Modern Slavery 2021; 'Hidden in Plain Sight', Report of the 2017 Parliamentary Inquiry into establishing a Modern Slavery Act in Australia; the Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities; and Report of the statutory review of the Modern Slavery Act 2018 (the first three years) completed June 2023.

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 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, 2023 and 2024. 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 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 were 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.**

SUPPLIER INDUSTRIES

- **Construction & Engineering.**
- **Commercial Services & Supplies.**
- **Construction Materials.**
- **Electrical Equipment and Electronic Equipment, Instruments & Components.**
- **Household Durables.**
- **Building Products.**

IDENTIFICATION

Eight vendors gave initially unacceptable answers, indicating potential high risk for modern slavery. We followed up to ensure they understood the questions and to gather more context. Seven of the eight vendors clarified or provided additional information, which we accepted.

04. CONTINUED

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 initially 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 the current reporting period, we have added an additional clause to our Incident and Investigation procedure, to include breaches of modern slavery.

In performing our modern slavery risk assessment of our suppliers we 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.

At the commencement of our modern slavery reporting, as recorded in our previous modern slavery statements, we created a vendor portal, which has now substantially progressed. 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 continued with this 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.

For the current reporting period we appointed 11 new suppliers that are within our top 50 spend suppliers. The majority were appointed for single, large projects, and all scored at a low risk to modern slavery, when completing our modern ethical sourcing survey, that includes a comprehensive modern slavery questionnaire. These vendors scored <8 out of 21 weighted questions answered. They operate in the following industries:

- 1) Construction & Engineering.
- 2) Commercial Services & Supplies.
- 3) Construction Materials.
- 4) Electrical Equipment and Electronic equipment, Instruments & Components.
- 5) Household Durables.
- 6) Building Products.

For the period 1 July 2023 to 30 June 2024, 633 modern slavery questionnaires were completed on our vendor portal. Of these 518 questionnaires have been approved, whilst the balance are in various stages of review by us. This includes 80 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 balance of suppliers comprises 24 that are pending and 11 were denied or revoked.

8 vendors were identified as having initially provided unacceptable answers to questions that indicated a potential for high risk to modern slavery. 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. 7 of the 8 vendors provided additional information or clarified their answers that was accepted and rectified by us. The remaining vendor has been archived as they did not respond to our requests for clarification.

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 vendors.

Intermain aims to continue to use the portal and information obtained from this, to build transparent and collaborative relationships with vendors and will further ensure that our expectations of reporting of modern slavery risks within the vendors 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 vendors 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 was incorporated into our new employee induction onboarding process, and continued to be an induction requirement for all employees. During the current reporting period, we have reviewed our existing training course and multiple alternatives, and have developed a new course 'Modern Slavery Awareness (AU)' that will be rolled out from September 2024 for all new starters and all staff who completed the initial training over 2 years ago. We have also implemented a process for staff to complete a refresher course every 2 years.

The COO & HSEQ Compliance Manager have attended webinars throughout the past year to keep abreast of any changes, and 'Tier 2 and Beyond: Supply Chain Risk Management' in July 2024. This was a modern slavery training course run by Informed 365. This webinar is for professionals looking to enhance their understanding of supply chain risk management. Attendees are provided with practical strategies from leading experts to support engagement, impact outcomes and tackle modern slavery in supply chains.

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.

Continual 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, and establishing further processes to remediate such breaches. We have as reported earlier in this statement held vendors accountable for not responding to our administrative modern slavery requirements (this resulted in 80 vendors whose status is deemed to have automatically expired, and 11 vendors whose status was denied or revoked).

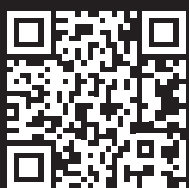
02.

Work in partnership with suppliers in designing and communicating expectations. This is largely based on results achieved in our portal, requests for additional documents and information, and working with vendors to address key issues.

03.

Conduct meaningful and sustained engagement with workers and their representatives, including on-site contractors, where practical to do so.

Book a
consultation



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Canberra
| Ngunnawal

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T 02 6171 5352

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