

MODERN SLAVERY STATEMENT

FINANCIAL YEAR 2022





OUR COMMITMENT

Richard Crookes Constructions (RCC) is committed to limiting the risk of modern slavery occurring within its own business, in its supply chains or through any other business relationship.

Modern Slavery can take many forms but fundamentally is a range of exploitive practices including human trafficking, slavery, forced labour and child labour all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

As part of its ongoing commitment the Company will comply with all applicable Australian and International slavery legislation including the Modern Slavery Act 2018 (Clth) and the Modern Slavery Act 2018 (NSW).

RCC does not tolerate modern slavery and will not knowingly engage in or partner with consultants, subcontractors or suppliers that engage in modern slavery.

1.0 REPORTING ENTITY IDENTITY & CONSULTATION PROCESS

This modern slavery statement has been prepared as a joint statement on behalf of the Richard Crookes Constructions Group of companies.

This joint statement has been prepared for RC&LC Holdings Limited (ABN 41 105 030 117) and its wholly owned subsidiary Richard Crookes Constructions Pty Limited (ABN 33 001 375 266). This group of companies is collectively referred to as 'RCC'.

The company secretaries for both entities have collectively worked together to prepare the joint statement.

2.0 REPORTING ENTITY STRUCTURE, OPERATIONS AND SUPPLY CHAIN

RCC is a private, family-owned design and construction management business that has been building for government and private clients since 1976. Our business is based on maintaining long-term relationships with clients, partners and subcontractors.



OPERATIONS

RCC's registered office (and head office) is located at Level 3, 4 Broadcast Way, Artarmon NSW. With our original and head office in Sydney, we provide localised client service with offices in Newcastle, Canberra, Tamworth and Brisbane.



Our teams are the cornerstone of everything we do. With approximately 850 direct employees, enabling the company to deliver over 55 projects concurrently across multiple sectors. RCC's strength is its diversity in terms of sectors, project size, delivery form, location and building type.

RCC's operations are split across 7 strategic business units, based on sector and geography. Each business unit is led by a General Manager.

Corporate operations (excluding staff costs) represents a very small % of the total business wide procurement. The vast majority (>98%) of RCC procurement relates to project spend, via engagement with subcontractors and suppliers.

RCC'S FIVE COMPANY VALUES:



CLIENT FIRST

A personalised service with a collaborative, open and honest approach.

RCC always put our clients' needs and interests first.



FAMILY VALUES

RCC has a strong culture based on the Crookes family values: open, honest, fair, respectful, collaborative and hard working.



DELIVERING CERTAINTY

Complete confidence the project will be delivered as promised on time, and budget, safely and to the highest quality.



FIRST STEP SAFETY

Committed to protecting ourselves, our colleagues, clients and visitors to ensure the safety of their future, health, family, friends and the surrounding environment.



WE DO WHAT WE SAY

We deliver on our promises.

Being a confident and reliable builder and providing a great service is what we are about.

SUPPLY CHAIN

RCC is heavily reliant on the use of subcontractors and suppliers.

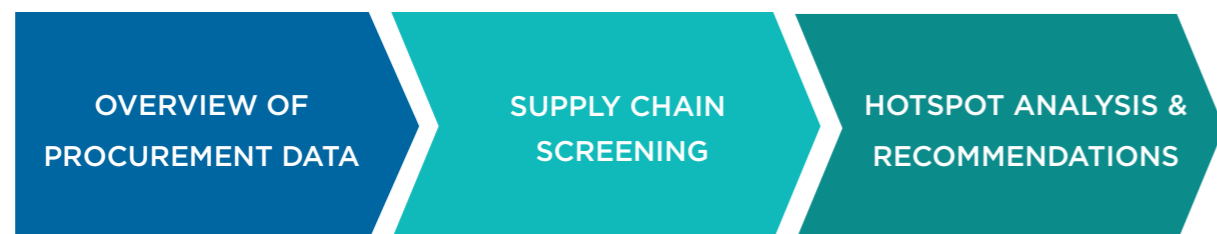
RCC had over 4,700 direct subcontractors / suppliers engaged on its construction projects during the FY22 reporting period, with an annual spend of circa \$1.31b.

On any given day, across RCC's 55 active projects, there are approximately 8,500 workers on site, 850 RCC direct employees and 7,650 employees / contractors of subcontractors.

RCC engages with Australian based subcontractors and suppliers, many of whom source materials from overseas sources, namely China, Malaysia and Europe (Italy, Turkey, Spain, France and Germany).

3.0 MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

In the previous (FY21) period RCC undertook a modern slavery risk assessment of its operations and supply chain.



The assessment identified the following as the key modern slavery risks within RCC's operations and supply chain:

- Underpayment, indentured workers and exploitation of migrants in construction, trades or labour hire;
- Labour conditions and child labour in the supply chain of building and mechanical products and materials;
- Labour conditions and child labour in the supply chain of manufactured goods, such as furniture, hardware and fittings.



The following table summarises the key types of modern slavery risk and where they may most likely exist within our operations and supply chain:

RISK PROXIMITY	PRODUCTS / SERVICES	KEY ISSUES
Direct (onshore and on-site activities)	Construction activities	Labour rights in construction activities including labour hire.
Supply Chain	Mechanical & Equipment	Labour rights and health and safety in overseas supply chains of parts, equipment and components and other manufactured goods including the production of metal products.
	Construction Materials	Labour rights, health and safety and human rights and governance in the overseas supply chain of building materials such as timber, plastic, glass, cement, metals, paint, textiles, ceramics, brick, sand, clay, stones, gravel, gypsum, brassware and iron.
	Electronics	Labour rights and health and safety in electronics supply chains.



4.0 ACTIONS TAKEN TO ASSESS AND ADDRESS OUR MODERN SLAVERY RISKS

Our key focus during the reporting period was to further assess and understand our supply chain and the assessed modern slavery risk

Key action undertaken was a 'track and trace' project – summary below:

TRACK AND TRACE CONSORTIUM PROJECT

RCC was a member of a Consortia (made up of a number of major Australian construction companies) that initiated a project to track and trace (T&T) the supply chain of common suppliers across assessed high-risk categories.

Through a self-assessment questionnaire (SAQ) solution delivered by Unchained Solutions Pty Ltd and Trace Supply Chain Intelligence Pty Ltd, the T&T project engaged with 22 first tier and 6 second tier suppliers.

For those suppliers that did successfully respond, the response data revealed the following:

1. A marked disparity between the initial assessment of risk by country (low) and the risk by industry (medium-to-very high);
2. That the goods of 14 suppliers were produced in 17 countries (in 58 locations);
3. None of the 16 respondents provided any CSR audit accreditation to validate minimum wage levels;
4. The T&T project highlighted the value of a stakeholder-based approach to assessing modern slavery risk over a 12 monthly period with the integration of supplier training, policy development and a mechanism to measure impact and key milestones.

The ability to effectively monitor and report on modern slavery risks is greatly enhanced when the manufacturing locations are seen as the primary tiers in the supply chain and the raw materials suppliers are located and engaged with directly.

5.0 ASSESSING OUR EFFECTIVENESS OF ACTIONS TAKEN

RCC regularly monitors the effectiveness of its framework, policies and processes used in relation to modern slavery risks, through the following means:

- Supplier interviews – conducting interviews with selected suppliers / subcontractors to review in more detail their responses to our modern slavery questionnaire;
- Employee Communication and training;
- Governance review – annual review of our key policies and procedures.

6.0 OTHER RELEVANT INFORMATION

NEXT STEPS

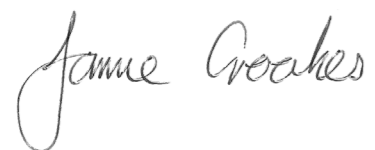
RCC is committed to the following actions during the FY23 reporting period:

- **Training and Awareness:** Providing more detailed Modern Slavery training to all staff

During the period RCC completed the detailed and comprehensive Ecovardis Modern Slavery and Sustainability Assessment – scoring in the top 82 percentile.

RCC continues to meet with a number of key clients to provide them an update on our modern slavery action plan.

This statement was approved by the Board of Directors of Richard Crookes Constructions Pty Limited on 19th December 2022.



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MANAGING DIRECTOR



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