

Schiavello International Modern Slavery Statement 2021 - 2022



SCHIIVAVELLO

Our Commitment

This statement pursuant to S6(1) of the Modern Slavery Act 2018, sets out the actions taken by Schiavello Construction to minimise the risk of modern slavery in our operations and supply chain.

At Schiavello, we recognise that slavery can occur in many forms. Our commitment to respect and support human rights is aligned to our Social responsibility policy. We support the UN Sustainable Development Goals with one of our priority goals being (goal 8): economic growth and decent work for all. Schiavello supports this goal and the commitment to eradicate any form of modern slavery – such as forced labour or child labour.

Since established in 1966, Schiavello has grown to become a respected multidisciplinary property and accommodation group encompassing the activities of property development, construction services, design and manufacture of advanced workplace furniture products and pre-fabricated building

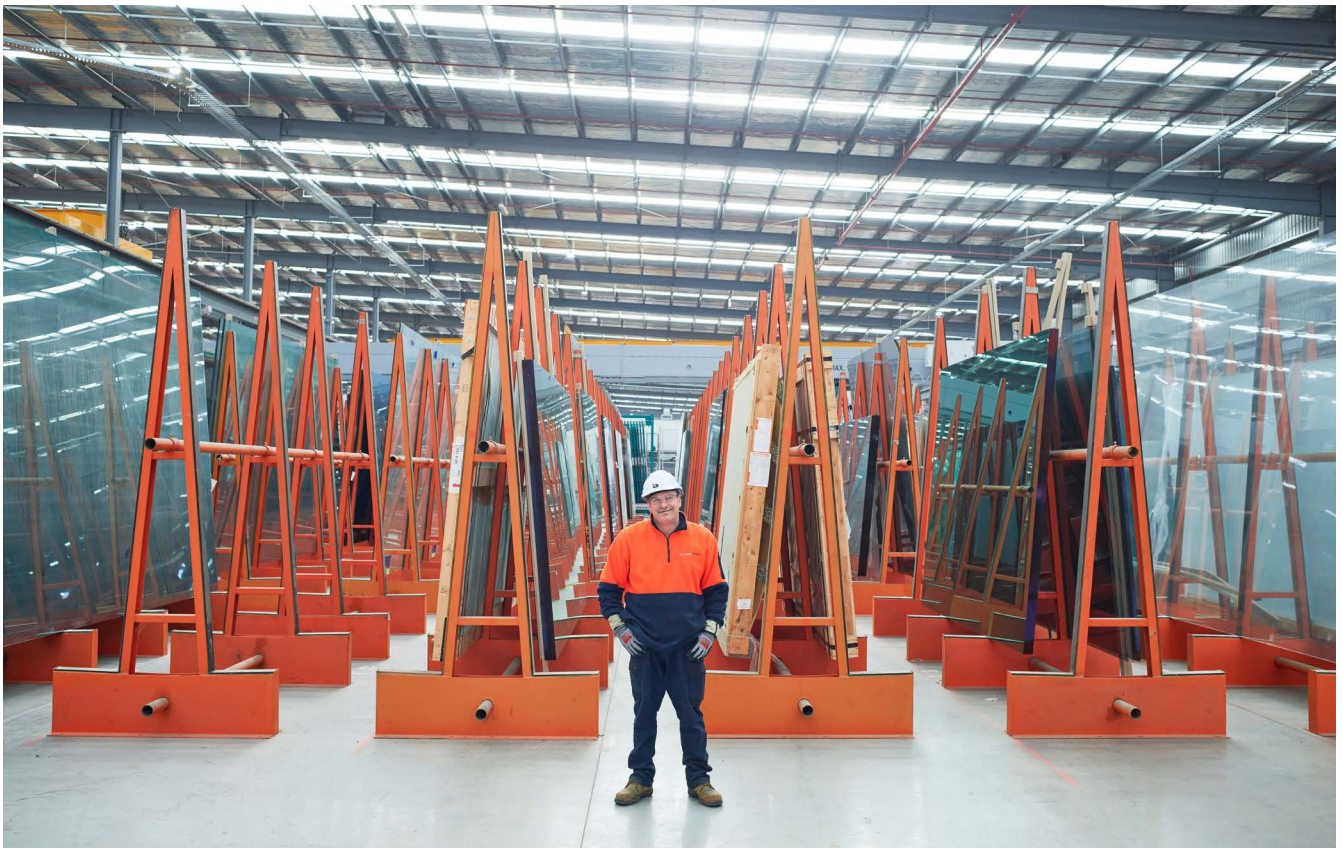
elements. We operate across multiple industry sectors including commercial, retail, healthcare, education, accommodation, hospitality, and multi-level residential with activities spanning across Australia, South-East Asia, China, Middle East and the US.



Peter Schiavello

Managing Director of Schiavello Group

This Statement has been approved by the Schiavello Construction Board of Directors on 30th November 2021.



Structure and Framework

Organisational Structure

We currently operate from various locations across Australia, including six manufacturing plants, and an award-winning headquarters based in Tullamarine. As part of Schiavello's integrated international network we have offices and representatives across South-East Asia, China, the Middle East, and the United States of America.

Our service network is the largest and most experienced in the industry, supporting companies and individuals as they move and grow.

Social Responsibility Framework

Schiavello recognises the importance of socially responsible behavior with our prime objective being to make decisions and act in such a way that benefits society and contributes to sustainable development. Schiavello is committed to the 5 pillars indicated in our Social Responsibility Policy, which include:

- Governance – a structured approach to making and implementing decisions in pursuit of our objectives –ensuring our decision making processes are aligned to our cultural beliefs and value systems;
- People - a commitment to exercising due diligence in providing a workplace and work practices that maintain and support basic human rights;
- Customers – a commitment that our products and services have been ethically and legally manufactured and supplied;
- Environment – assuming responsibility for the environmental impacts cause by our activities; and
- Community – supporting and fostering relationships in our community that allow us to contribute to sustainable development.



Behavioural Standards and Risk Management

Schiavello's core values and our Code of Conduct set behavioural standards for everyone who works for, or on behalf of Schiavello.

Our values describe what we stand for and guide the way we do things. At Schiavello we have 5 core values:

- Integrity above all;
- The pursuit of excellence;
- Our word is our bond;
- Ambitiously innovative; and
- Live with passion

Our core values and code of conduct helps Schiavello to take a consistent, global approach to important ethical and compliance issues. Our code covers a range of important elements in particular how we intend to conduct business in the most ethical and lawful way.

Our whistle blowing approach is our commitment to calling out any behavior classified as "unethical" – essentially any contravention to our core values, code of conduct or modern slavery expectations.

Our Principles

We have developed the following principles underpinned by our values:

- We act in the best interest of the company and our stakeholders;
- We compete fairly and comply with the law in the countries we operate;
- We maintain a safe work environment where we treat others with respect and promote consultation and participation practices;
- We aim to make a positive and sustainable economic, environmental and social contribution in all areas where we operate;
- We secure and protect the property of Schiavello including company and personal information;

We take seriously our code of conduct and encourage calling out behavior that appears unethical or simply not right.

We have examined our human rights risks to identify our key risks:

Labour Rights (Human Rights) including:

- Forced labour
- Wages and benefits
- Work hours
- Child labour



Health and Safety



Anti-Discrimination



Privacy and Data Security



Freedom of Association



Anti-Bribery and Corruption



Supply Chain

We have continued to make our expectations of suppliers clear through the development and continuous improvement of our procurement processes pertaining to "prequalification" and "monitoring and evaluation of supplier performance". We have redeveloped internal supplier prequalification criteria to ensure that our suppliers:

- Ensure compliance with all applicable modern slavery laws;
- Provide confirmation that they have not been convicted or investigated for any modern slavery related offences;
- Take all reasonable steps to ensure that their supply chain have adequate processes in place to prevent acts of modern slavery; and
- Agree to allow Schiavello (upon request) to undertake audits of their activities or those of their suppliers.

Behavioural Standards and Risk Management cont.

Assessing the effectiveness of our actions

Risks of modern slavery in our supply chain are assessed on an annual basis through our review of the supplier self assessment pre-qualification criteria.

During the reporting period (1 April 2020 to 31 March 2021), completed supplier self-assessments did not reveal any risks of modern slavery.

The ongoing commitment to review the effectiveness on our pre-qualification criteria annually will assist Schiavello achieving stronger risk management practices to further develop our process in tackling modern slavery risks.

Consultation and Awareness

The modern slavery awareness session continues to be rolled out with new and existing staff to inform all on Schiavello's policies and procedures which support the protection of human rights.

We continue to communicate to Modern Slavery Compliance obligation in our subcontract agreements and our contractor onboarding process.



Achievements and Beyond

2019 - 2020 Modern Slavery achievements

Development and delivery of Modern Slavery awareness training

Development of supplier and contractor prequalification assessments incorporating Modern Slavery commitment criteria

Schiavello Social Responsibility Policy incorporating Modern Slavery expectations

Looking ahead 2021 - 2022

Documentation

Annually review and updating our internal processes and procedures to ensure compliance with the Modern Slavery Act 2018.

Further amends to (as necessary) HR policies and supporting documentation to review current Modern Slavery expectations, including:

- Code of Conduct
- Behavioural Expectations
- Whistleblower

Auditing

To annually review and update our internal processes and procedures to ensure compliance with the Modern Slavery Act 2018.

Carrying out audits on randomly selected suppliers / contractors on their modern slavery compliance.

Training

Maintaining awareness sessions to all new and existing staff on Schiavello policy and procedures and our obligation in relation to Modern Slavery



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