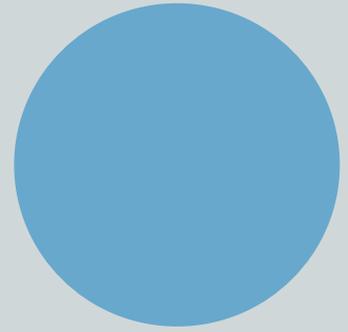




BAY
BUILDING GROUP



BAY BUILDING GROUP

**MODERN
SLAVERY
STATEMENT**

JUNE 2021



MODERN SLAVERY STATEMENT



Our Commitment

Bay Building Services recognises the importance of adhering to the highest standards of ethical behaviours and holds expectations that our partners, suppliers and employees do the same. In support of this commitment Bay Building Services has a current published Code of Conduct and Supplier Code of Conduct available on our company website: www.baybuildinggroup.com.au

Overview

Founded in 1985 Bay Building Services has grown to become a major privately-owned building company operating in all states and territories within Australia, with the exception of the Northern Territory.

The values of Bay Building Services (BBS) and our employees are the pillar of our success and growth around Australia:

Integrity - Doing the right thing and being accountable

Teamwork - Involving our BBS colleagues

Honesty - Being open, transparent and ethical

Respect - Understanding and appreciating each other



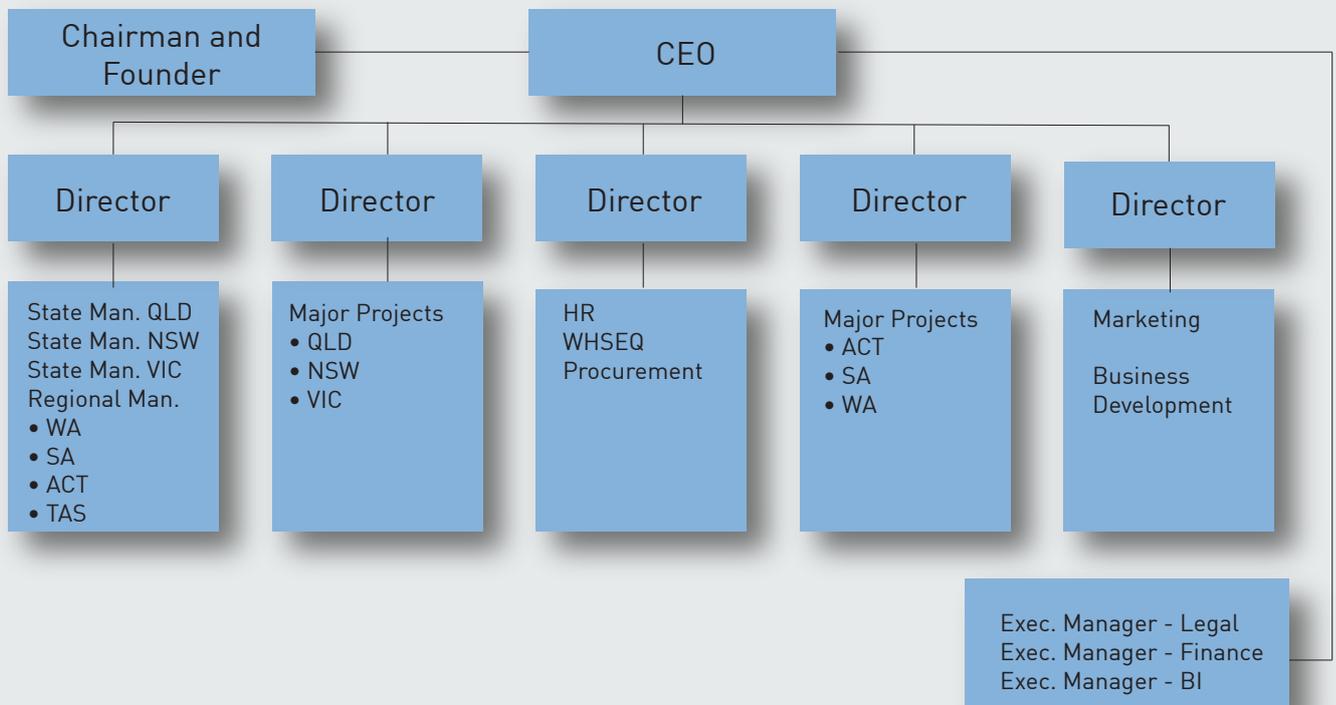
The purpose of this document, the BBS Modern Slavery Statement, is to recognise and report the actions we have undertaken to assess and address the modern slavery risks in our operations and in our supply chains, in compliance with the Modern Slavery Act 2018. This document should be read in conjunction with the BBS Code of Conduct and Social Procurement Statement

Structure:

Bay Building Services is privately owned, and led by our Chairman (& Founder), CEO and a Directorship team of five, covering Construction & Major Projects, People & Business Services, Commercial & Specialty Building, Insurance Building & Restoration and Marketing & Business Development.

Additionally, an Executive Team of twelve support and lead the business around the country, with Bay Building Services currently employing 210 FTE across its 8 offices.

Bay Building Group - Company Structure 2021

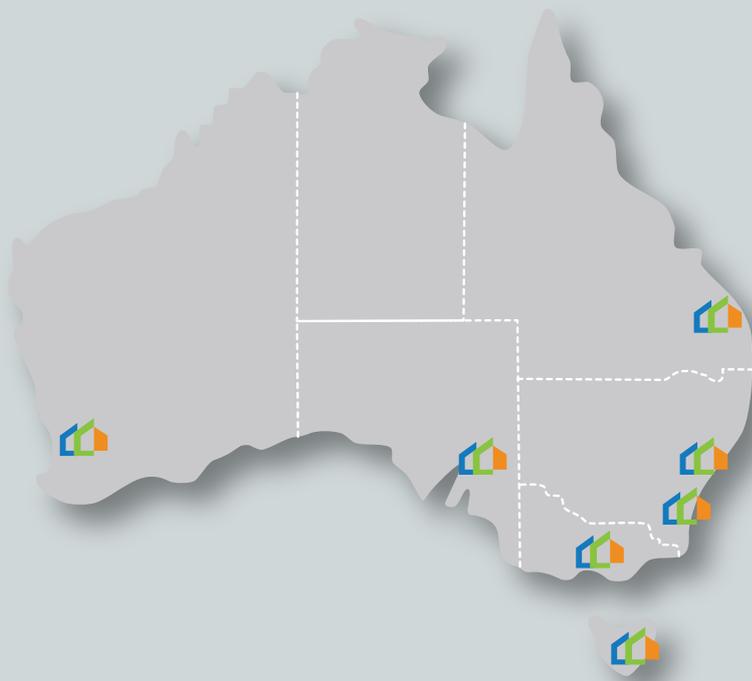


MODERN SLAVERY STATEMENT

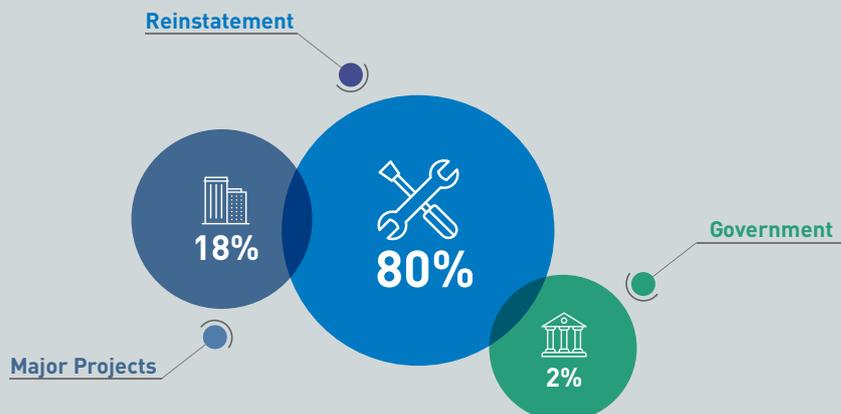


Operations:

As a nominated insurance builder, BBS's main operations consist of assessing, quoting and co-ordinating the repair and/or restoration of insured premises, primarily residential, through our sub-contractor network of trades. Bay Building Services has operations in 7 States and Territories throughout Australia.



In conjunction to this, BBS also operates in the Major Projects / Major Loss category, including responding to 'catastrophe events', Government tenders and engaging in large commercial / specialist works.



Supply Chain:

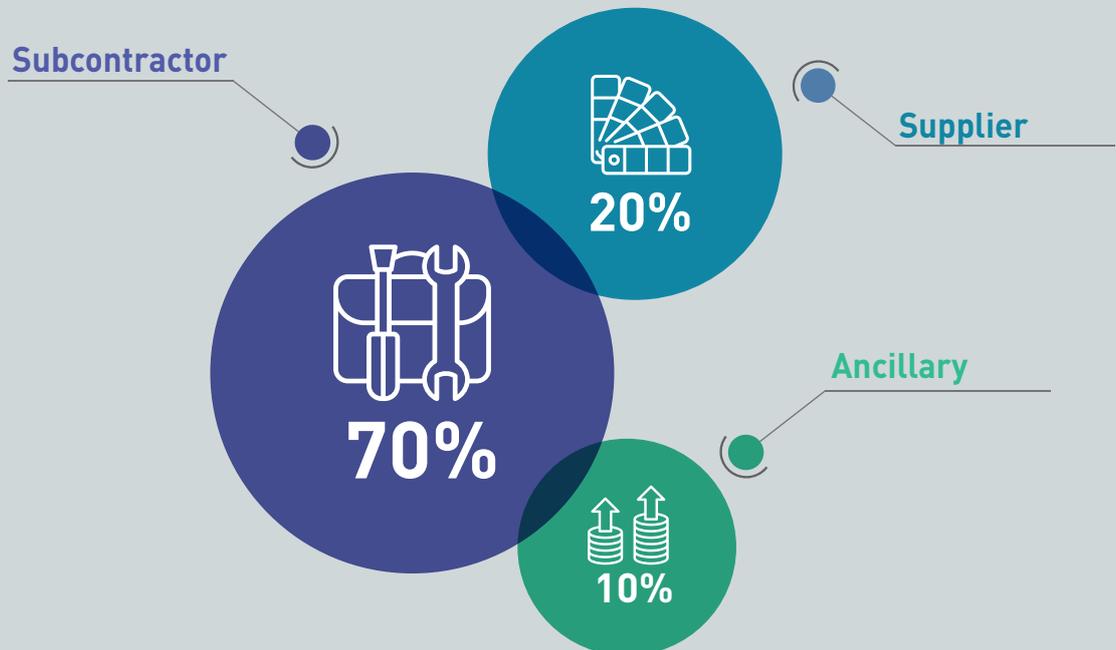
Bay Building Services has over 1800 direct contractors and suppliers across the following categories.

Categories of supply chain:

- Subcontractor – construction & restoration
- Suppliers – materials, manufacture, import, transport sectors
- Ancillary Products* - items required for cost of sales, operations, office supplies.

While the majority of the supply chain in our Subcontractor category, BBS also has direct off-shore contracts in the Supplier category and via third parties in the Ancillary Products category.

Building and Construction Contract Areas



* Ancillary Products includes but is not limited to: property agents, promotional merchandise, fleet management, consultants, office consumables, technology & IT support, Cleaning, consultants, labour hire providers, uniforms, PPE, temporary labour agencies

MODERN SLAVERY STATEMENT



Risks of Modern Slavery Practices

Referencing the Global Slavery Index (2018) findings, BBS recognises the following initial areas of risk requiring further investigation and consequent action / mitigation:

Risk	Category	Consideration
Forced Labour	Subcontractor Construction and/or Restoration	<ul style="list-style-type: none">• Under minimum wage• Debt bondage
Imported Products	Ancillary Products Laptops, computers, mobile phones Apparel	<ul style="list-style-type: none">• Origin Country• Origin Country
Vulnerability	Subcontractor Construction and/or Restoration	<ul style="list-style-type: none">• Migrant workers• Language barrier• Under payment - Superannuation

The Impact of Covid-19

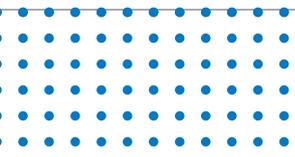
In April 2020, the Australian Border Force issued an information notice asking businesses to consider the impacts of COVID-19 on modern slavery risk mitigation and to provide comment.

As a part of the construction industry and insurance sector, our operations and supply chain remained consistent and resilient during the last 12 month period.

Specific controls and measures were systematically implemented across our operations to protect workers, subcontractors and customers from the risk associated with COVID-19.

These measures include:

- Appointment of a COVID Response Team including Director, HR, WHSE, Procurement, Legal & Construction team members
- COVID-safe procedures and guidelines for management of construction sites
- COVID-19 awareness training for employees & subcontractors
- COVID-19 protocols issued to every customer
- COVID-19 health information posters displayed in common areas
- Targeted mental health support for our employees & their families via our national EAP



Actions Taken to Address Risk

Internal: BBS Workforce

a) Education and Awareness:

Directors, Executive Managers and all hiring managers have been allocated and recorded training in the following areas:

- Code of Practice
- Vulnerable Members of Society
- Modern Slavery
- Whistleblowing Awareness
- Family Violence Awareness for Managers

In addition, the on-boarding process of all new starters at BBG complete a training module aimed to create awareness on vulnerable members of society.

b) Modern Slavery Working Group (MSWG)
Currently meeting quarterly, BBS' MSWG comprises representatives of Directors, Human Resources, Supply Chain Management and Legal within BBS.

The MSWG discusses and documents risks and mitigations with both internal and external stakeholders in BBS' Modern Slavery commitment to ensure proactive adherence is applied across the business. Minutes of these meetings are available upon request.

External: BBS Supply Chain

a) Contracts and On-boarding:

As our greatest area of exposure, each Sub-contractor is presented with a Trade Supplier Agreement obligating an agreement regarding Modern Slavery awareness and practices. Further each sub-contractor undertakes on-boarding via our third party compliance portal (LinkSafe) requiring them to specifically agree to the statement:

"Do you confirm that your business complies with all applicable anti-slavery and modern slavery laws and does not engage in any modern slavery practices, including using forced, bonded, involuntary labour or human trafficking."

b) Supplier Modern Slavery Statements:
As BBS engage with an increasing number of national suppliers throughout Australia, their own Modern Slavery Statements and ongoing assessments form part of our criteria for further commercial interactions. Those companies with voluntary Modern Slavery Statements are viewed favourably as an ongoing BBS supplier.

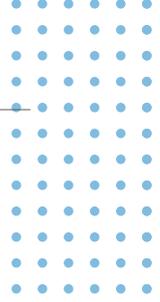


Assessment of Effectiveness

Via the MSWG and in conjunction with BBS Executive Management Team, Bay Building Services are committed to continual assessment of effectiveness encompassing the below:



Future statements will show the development and outcomes of these steps as the important work of Modern Slavery abolishment continues.



Approval of the Board

This statement has been approved by the Board of Bay Building Services on June 28th 2021.



KANE MALHERBE
CEO
29th June 2021



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