

Modern Slavery Statement

FY 2023

INFINITY

Build. Above. Beyond.



This Statement has been prepared in consultation with, and on behalf of all eligible Infinity Constructions Group reporting entities under the Commonwealth Modern Slavery Act 2018.

It also serves as a voluntary statement, prepared, and submitted in consultation with other Infinity Constructions Group entities, the do not currently qualify as reporting entities under this legislation.

We do this as a complying entity, a demonstration of best practice and consistent with the values we hold as a responsible, privately owned organisation.

Submitted by Infinity Constructions Group (ABN 95 111 941 792) on behalf of all related Infinity Constructions Group operating entities.

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Dangrove - Alexandria, NSW

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01

INTRODUCTION



Dangrove - Alexandria, NSW

RESPECTING HUMAN RIGHTS

It is estimated that 40.3 million people around the world and at least 15,000 people in Australia live in slavery like conditions.

Human Rights are a set of principles concerned with equality and fairness. We must respect, uphold and advance human rights in everything that we do. We acknowledge that our activities have the potential to impact human rights and we manage this through our core business practices.

Preventing and addressing our own involvement in modern slavery is central to our sustainability approach including our commitment to running a safe, responsible and profitable business.

We set clear expectations to our employees, partners, subcontractors and suppliers that they should be alert to possible involvement in modern slavery and work to prevent and address it.

The introduction of the Modern Slavery Act 2018 (Cth) (the "Act") – a move Infinity Constructions Group welcomes – illustrates the Australian Government's commitment to taking action against the issue and signifies that modern slavery is wholly unwelcome within the Australian community.

As an Australian construction contractor, we acknowledge that our business operates within a modern slavery risk industry and recognise that our operations therefore have the potential to have genuine impact.

As this Statement shows, we reaffirm our commitment to long-term continuous improvement in our operations to ensure that we are contributing to the collective goal of ending modern slavery.

This Statement was approved by the Infinity Constructions Group's Board of Directors on 7th of July 2023. The Statement was approved on behalf of the joined reporting entities.

Infinity's goal is to eliminate modern slavery in its operations and supply chains.

Achieving our goals continues to be a multi-year project and requires all of us to work together to protect the rights of all vulnerable people.



Alan Yazbek
Managing Director;
Infinity Constructions Group
13/09/2023



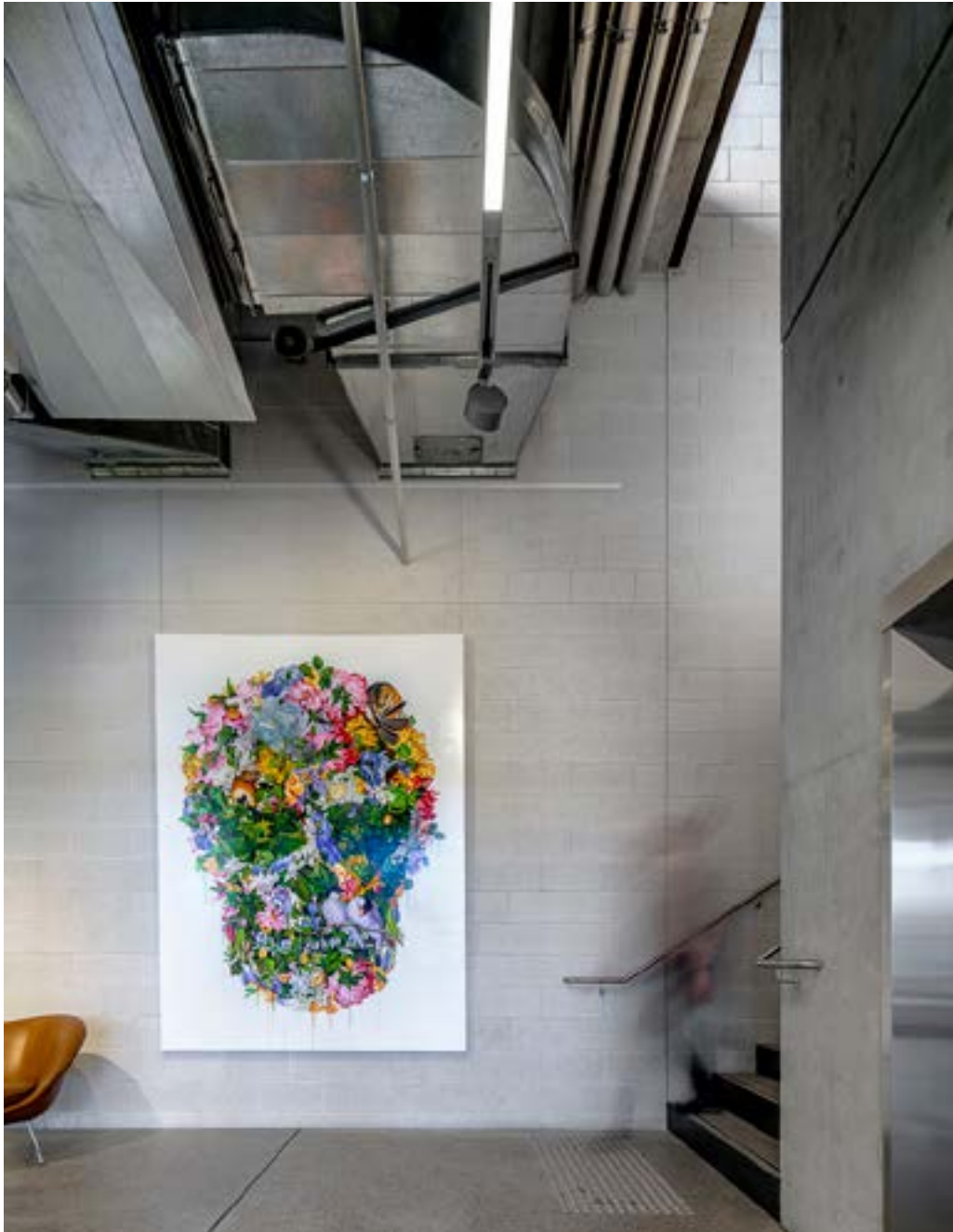
The Revy - Pyrmont, NSW



Infinity Constructions Staff

02

OUR STRUCTURE, OPERATION & SUPPLY CHAIN



Dangrove - Alexandria, NSW

OUR STORY

Infinity Constructions is an Australian Construction Company primarily operates in NSW and Victoria. Our operations are predominantly metropolitan based with offices in Sydney and Melbourne. We operate in two main sectors:

- Commercial
- Industrial

Specifically, in construction of offices, hotels and hospitality, health and aged care, education, defence, industrial warehouses, student accommodation & co-living, build-to-rent and community.

Infinity was established in 1992 and has developed a reputation for undertaking difficult construction projects with an emphasis on safety, environmental management, quality, timely completion and smart engineering.

We are the contractor of choice for a number of leading architects, developers and clients. This Statement is made by Infinity Constructions Group

Pty Ltd (ABN 95 111 941 792) for the year ended 30 June 2023 pursuant to the Modern Slavery Act 2018. (Cth) (Modern Slavery Act).

Infinity Constructions Group Pty Ltd is a privately held company committed to driving positive change in the Australian Construction Industry (predominately in NSW). It is owned by Directors all whom are actively involved in the day to day management and operation of business.

This statement sets out what Infinity Constructions Group Pty Ltd has done in the Financial year 2022/2023 to work towards ensuring that slavery and human trafficking is not taking place in any part of its business or supply chains.

OUR VISION

To be recognised by our Clients, Consultants, Subcontractors, Suppliers, the Community and Employees as a Trustworthy Business Partner.

OUR MISSION

To maintain trustworthiness by working with all our stakeholders to deliver our projects with excellence, cooperation and collaboration, cost effectiveness, on time, with the desired quality and the highest level of workplace health and safety.



University Square - Carlton, VIC

OUR VALUES



TZA - Chippendale, NSW

Our core values are the building blocks to the success of Infinity, guiding our name to be synonymous with quality projects and construction. These values define Infinity and how we conduct our business. Since our inception, Infinity has earned its reputation in both the industry and wider community.



SAFETY

Safety is everyone's responsibility and will always take priority over all other considerations. Safety is at the heart of everything that we do.



SUSTAINABILITY

Our business must always remain sustainable. Sustainability is achieved when all our processes come together to deliver efficiency and value.



ACCOUNTABILITY

We are accountable for the buildings we build, the way we operate and the outcome of our actions. Our buildings are there for the long-term and we respect our clients and those who occupy the buildings.



TRUSTWORTHINESS

Trust in us and from us is the fundamental ethos of Infinity's culture. In everything we do, we gain, maintain and foster trust. Trust comes from us delivering what we promised.

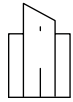


The Revy

03

IDENTIFYING RISKS OF MODERN SLAVERY IN OUR SUPPLY CHAIN

OUR OPERATIONS



500+

Projects Built



2

Office Locations (NSW & VIC)



110+

Infinity Staff



4.2-Star Gold iCIRT Rating



2000+

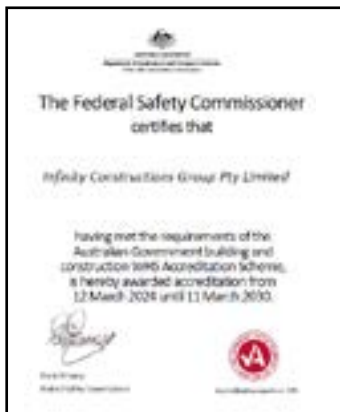
Australian Suppliers



10+

International Suppliers

OUR ACCREDITATIONS



OUR SUPPLY CHAIN

The majority of the works that we undertake are reliant on a strong supplier and subcontractor base (Suppliers). Many of our Suppliers have worked with us for many years and some dating back almost three decades.

Our excellent reputation and the continuance of that reputation is very much reliant on them. We work with them in a cooperative and collaborative style relationship.

Our subcontractors are assessed by a wide range of criteria including financials, industrial codes, insurance, safety, EMS and Modern Slavery.

Our Supply chain covers 6 key areas:

- Supply Chain Strategy and Planning
- Purchase, Procurement and Fulfillment
- Inventory Management
- Delivery and Customer Service
- Measurement and Evaluation
- Monitoring and Maintenance

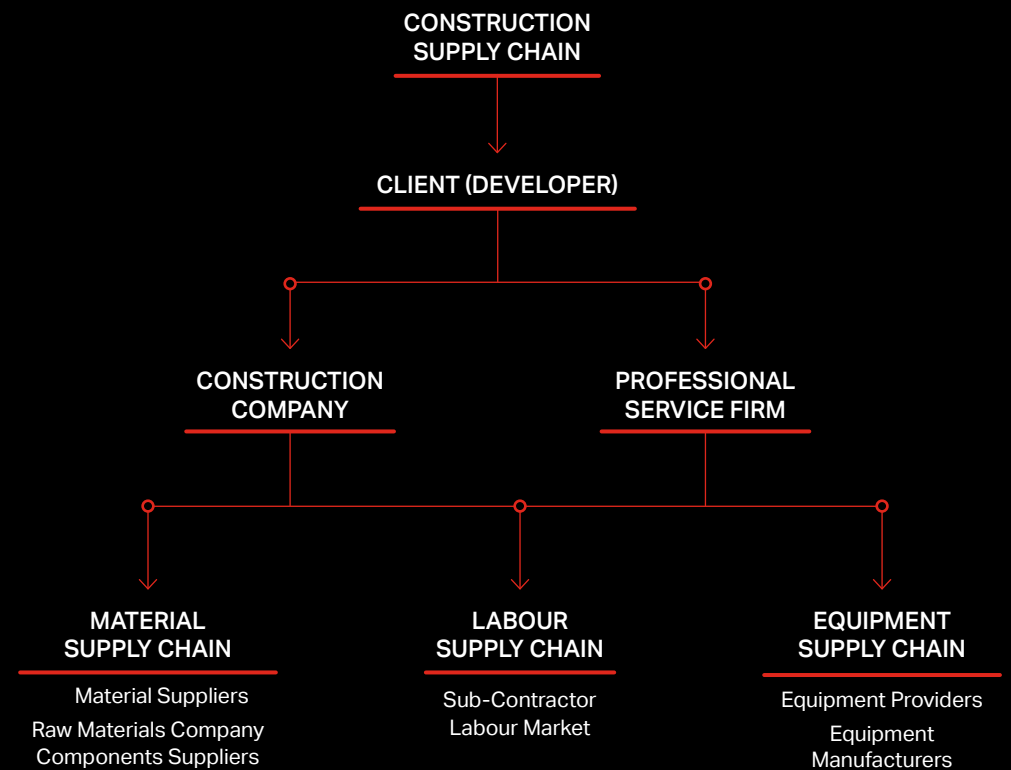


TZA - Chippendale, NSW



Dangrove - Alexandria, NSW

OUR SUPPLY CHAIN



OUR SUPPLY CHAIN

CONSTRUCTION SITE - PROJECT TEAM

MATERIALS & LABOUR

Hoarding
Scaffolding
Access flooring
Floor & Walls inc. Carpet and flooring
Ceilings and partitions
Doors and frames
Inter-tenancy stairs
Concrete – supply and place
Facade such as Glass, Aluminum, Terracotta, Fibre C, GRC and Aluminum Cladding
Form-work
L2 transfer wall prefab cage
Podium facade
Post tensioning
Tiles and Stone
Structural Steel
Joinery
Bathroom Pods
Carpentry

EQUIPMENT

Hoarding and jump-form signage
Loading Platforms
People and materials hoists
Rubbish Bins
Site Sheds
Tower Cranes
Prefabricated Modular buildings

ROOFING

Steel

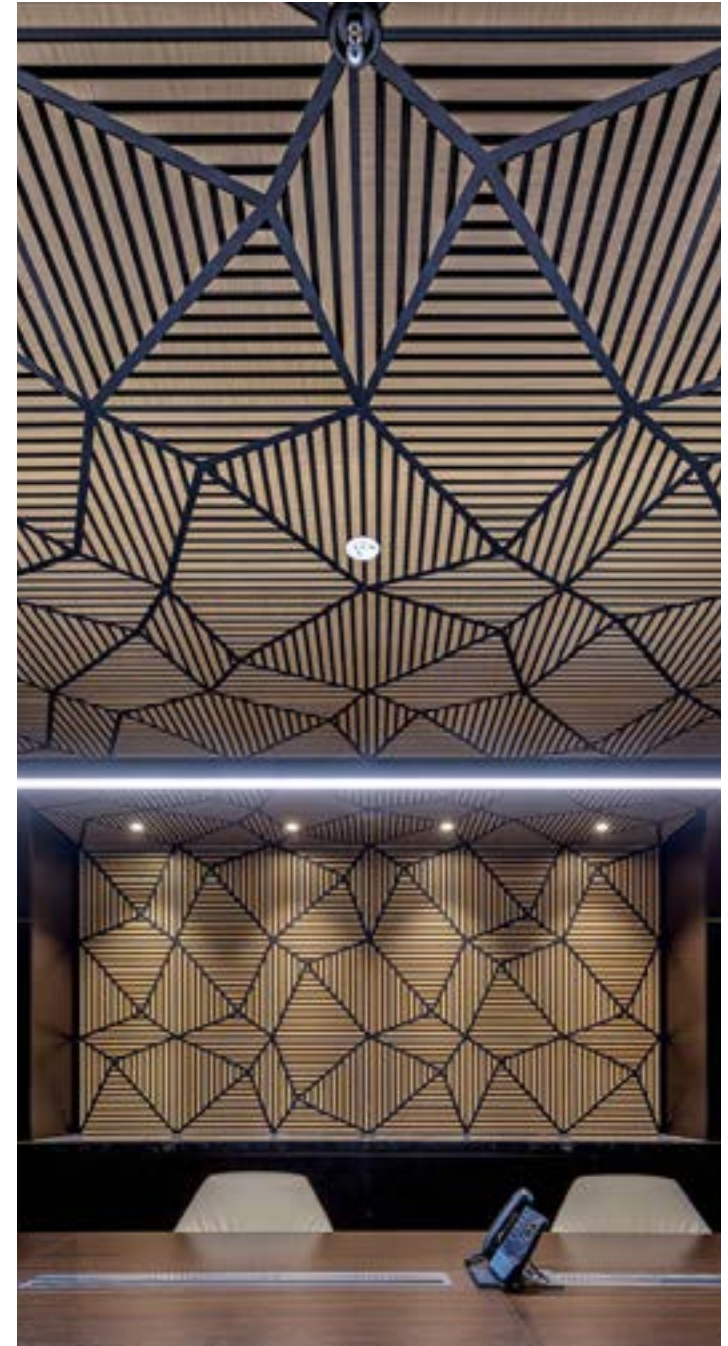
Tiles

SUBCONTRACTORS & LABOUR

Construction survey
Traffic control
Masonry works
Painting
Turntable
Electrical security comms services
Fire protection services
Hydraulic services
Lift services
Mechanical and
BMS services Demolition / Earthworks
Reinforcement fix
Brick + Masonry Works
Landscape Works
Consultant Services - Architects/ Design

MATERIALS

Steel
Concrete
Reinforcement Supply
Timber



Bankstown RSL - Bankstown, NSW

Build. Above. Beyond.

OUR SUPPLY CHAIN

HEAD OFFICE

DEPARTMENTS

WHSEQ + Systems
Human Resources
Marketing
Finance
Business Development
Contract Administrators
Estimating
Administration

SERVICES

Legal
Cleaning + Janitorial Services
Security Services
OH&S Uniforms
IT equipment, Services + Software
Insurance
Loose Tools
Mail + Cargo Transport
Entertainment
Passenger Transport
Motor Vehicles
Consultants



University Square - Carlton, VIC

Build. Above. Beyond.

PROCUREMENT PROCESSES



IRT - Wollongong, NSW

In order for a Supplier to be engaged on one of our projects they must submit a completed "Subcontractor/Supplier Questionnaire". This questionnaire is assessed and vetted by our procurement teams to ensure that the Supplier has the relevant processes in place to ensure that they are able to comply with our processes. As part of this assessment and vetting process our Suppliers are required to set out their policies and approach to managing modern slavery.

Our Suppliers are expected to have their own Code of Conduct in line with Infinity's Code of Conduct.

In addition, all prospective Suppliers attend a "Tender Interview Questionnaire" meeting where they are asked to confirm their commitment to their modern slavery policy. For those Suppliers who engage sub-suppliers, including those that are based internationally, we request compliance statements with the Modern Slavery Act.

As a minimum they must confirm strict compliance with all local and national employment laws and regulations including the payment of the minimum wage and comply with all relevant bribery, corruption and secret commissions laws.

In addition, they must confirm strict compliance with occupational Health and Safety and Environmental laws. The performance of our Suppliers is assessed at the completion of their works and entered into a data base for subsequent procurement teams to review.

We are committed to the highest ethical behaviour attainable and will continue to train and communicate with our employees, suppliers and the greater supply chain to reduce wherever possible any incident of modern slavery.

RISKS IN OUR OPERATIONS



Canva Office - Surry Hills, NSW

The risk of modern slavery practices within our business were assessed on their potential to cause, contribute to or be directly linked to modern slavery through our operations and supply chains.

The risk of modern slavery in our operations was assessed as low - medium for the reasons set out below.

RISKS IN OUR OPERATIONS

IDENTIFIED RISKS	RISKS	RISK LEVEL
Casual or Contract workers engaged directly by Infinity	Infinity Constructions workforce is majority permanent, with <10% casual contractors.	Medium
Casual workers under the age of 18 years old.	Infinity Constructions has no casual employees under the age of 18 years old.	Low
Migrant Workers	Infinity Constructions has <1% employees on a temporary visa.	Low
Seasonal workforce fluctuation	Infinity's operations are not seasonal, with consistent workforce turnover during the reporting period.	Low
External Auditing	Infinity Constructions' audited to quality, environmental and safety management standards ISO9001, ISO14001 and AS45001 but is not currently audited by a third party for responsible sourcing. Also, we are accredited and audited by Office of Federal Safety Commissioner (FSC).	Low
Sector Risk	Infinity Constructions operates in high-risk sectors including: Construction	Medium
Service engaged by Infinity Constructions	Infinity Constructions relies on services including recruitment, legal, cleaning services, construction, property maintenance waste disposal and equipment maintenance. Recruitment, construction and cleaning services are considered particularly high risk. Infinity generally has long term relationships with small family businesses or recognised service providers with strong human rights.	Low
Staff	<p>Our executive leadership team meets regularly to discuss business risk, which ensures that they have visibility of the risks in our operations and the controls adopted to manage those risks</p> <p>We have strong human resources controls in place for on-boarding new employees, reviewing employees' wages and salary agreements, and verifying corresponding payments. These form part of our Integrated Management Systems that control the processes within our businesses.</p> <p>Our employee induction processes also ensure that new employees confirm they have read and understood our policies and minimum standards.</p> <p>Our employee on-boarding processes include working rights employment checks managed by our Human Resources group.</p> <p>Internal pay parity reviews are undertaken annually against industry benchmarks.</p> <p>Our staff are all located in Australia.</p>	Low

RISKS IN OUR SUPPLY CHAIN

Materials and construction services, including labour hire are the main areas of higher risk in our business.



The Revy - Pyrmont, NSW

Modern slavery can be linked to a number of factors pertinent to the construction sector as listed below:

- Prevalence of outsourcing, which can impact upon operational and supply chain transparency
- Contract terms with low margins and significant pressure on delivery times
- Reliance on a migrant workforce with limited local language competency and temporary visa arrangements
- Jurisdictional risk and industry risk in the supply of some construction materials
- Multiple sub-contracting arrangements with informal agreements
- Low barriers for entry for labour hire providers
- Dangerous or substandard working conditions, including:
 - Workers are not paid fairly or withheld entitlements
 - Workers may be required to work excessive hours
 - Workplace safety concerns

Our suppliers predominantly provide labour and materials, as well as services. The materials used in the construction sector

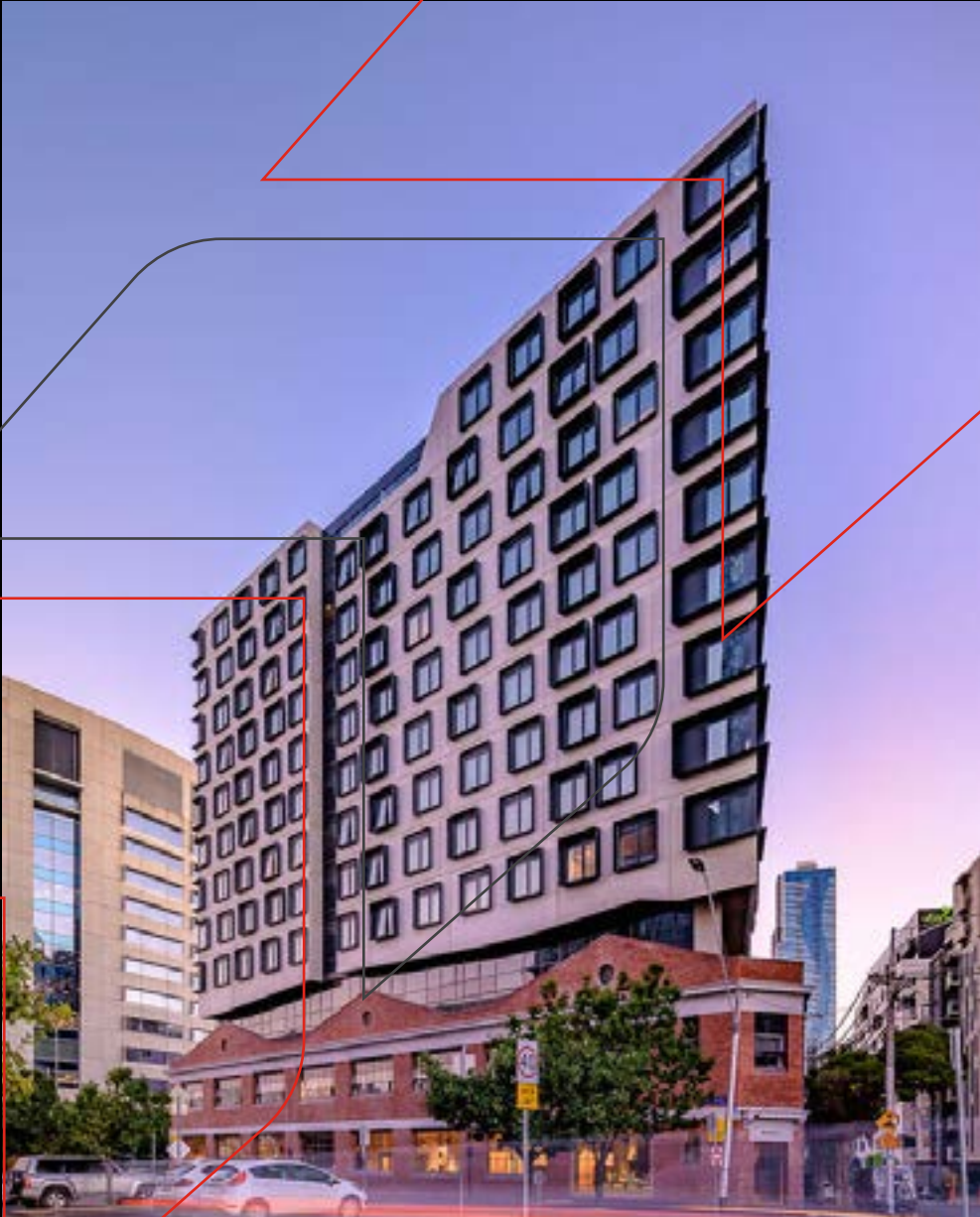
are often grown or manufactured in countries where modern slavery is a greater risk, which also creates risk in the latter tiers of our supply chain. The transport of these materials to Australia also creates modern slavery risk (noting that transport and logistics are inherently high risk for modern slavery).

The selection of construction materials is often made by either the customer (where a particular material is specified, which can only be sourced from one supplier) or the subcontractor supplying labour and materials. It is difficult for a construction company such as ours to have visibility across the multiple tiers in the supply chain of the numerous components and raw materials that are used on our construction sites.

We understand that each of our suppliers may have modern slavery risk in their own supply chains and this could mean that we are put at risk of being directly linked to modern slavery through the business practices of companies in the latter tiers of our supply chain.

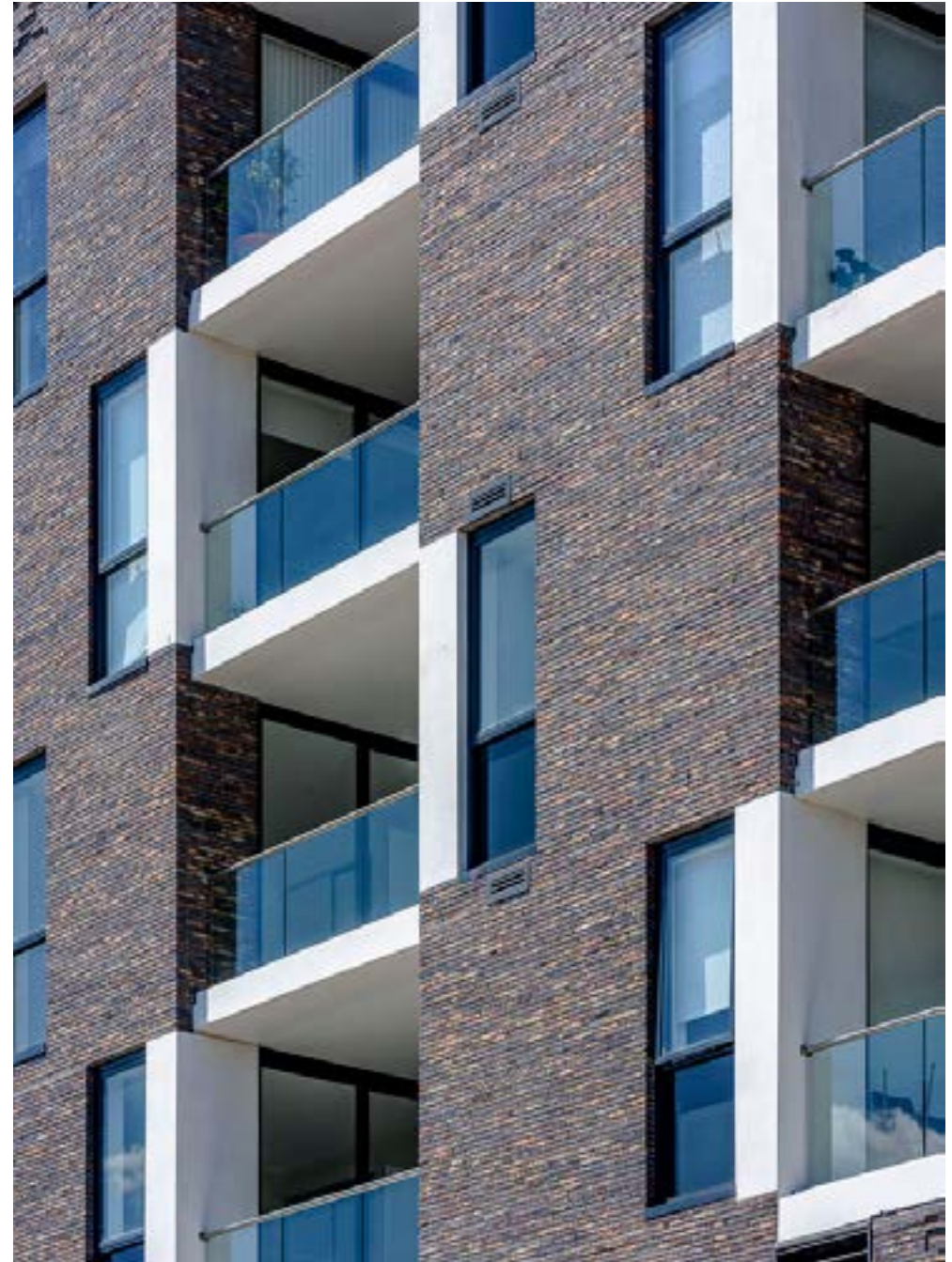
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ACTIONS WE HAVE TAKEN TO ADDRESS MODERN SLAVERY



University Square - Carlton, VIC

The risk of modern slavery practices within our business are assessed on their potential to cause, contribute to or be directly linked to modern slavery through our operations and supply chains.



IRT - Wollongong, NSW

SUMMARY GOVERNANCE

WHISTLE BLOWER POLICY

Infinity recognises the value in developing and fostering a culture of corporate compliance, ethical decision making and protecting eligible whistleblowers to make protected disclosures without suffering detriment.

The purpose of our Whistle Blower policy is to prevent and protect disclosed matters, outline the process by which Infinity recognises the value in developing and fostering a culture of corporate compliance, ethical decision making and protecting eligible whistleblowers to make protected disclosures without suffering detriment.

CODE OF CONDUCT POLICY

At Infinity we promote freedom of expression and open communication, however all employees, and our subcontractors, are expected to follow our Code of Conduct. Our Code of Conduct contains the details on the standard of ethics, conduct and behaviour that we are expected to operate under including the observation of basic human rights and the applicable labour laws.

A mandatory online Code of Conduct training module, through our Human Resources

Information System, is undertaken by all our employees within the first week of employment. Our Intranet portal contains a copy of the Modern Slavery Act 2018 for all employees to refer to. In addition, we encourage all of employees to raise any breaches of the Code of Conduct via our Whistle Blower policy.

TENDER INTERVIEW & EVALUATION

Supplier Questionnaire: Infinity's on-boarding of potential suppliers are now required to respond to specific questions in modern slavery compliance as part of Infinity's sub-contractors tender.

Evaluation Report:

- This includes acknowledgment & agreeing to Modern Slavery precautions in Infinity's contract documentation.
- Warranting they will not utilise modern slavery directly or within their supply chain
- Acknowledging they are not aware of any modern slavery risks in their operations or supply chain.
- Agreeing to notify Infinity if they become aware of any Modern Slavery in their operations or supply chains
- Agreeing to participate in Modern Slavery Audit.

EQUAL OPPORTUNITY POLICY

Ensuring that all persons seeking employment are treated equitably and are not subjected to any form of unlawful discrimination or harassment.

WORK , HEALTH, SAFETY AND WELFARE POLICY

Infinity Constructions is committed to providing a healthy and safe workplace and to eliminating conditions and incidents, which could result in personal injury or ill health via continual improvements to the WH&S practices in our business.





The Revy

05

ASSESSING EFFECTIVENESS OF OUR ACTIONS

MEASUREMENT & EVALUATION ACTION PLAN

MILESTONES	KPI	COMPLETION	TARGET FY23
Policies and Procedures	Modern Slavery Statement	Published FY20	Updated Annually
	Whistle Blower Policy	Published FY21	Ongoing
	Code of Conduct Policy	Published FY21	
	Employee Code of Conduct	Published FY21	Updated FY23
	Supplier Code of Conduct		
Due Diligence	Post Tender Interview Questions	Published FY21/22	Ongoing
	Modern Slavery Questionnaire issued to selected suppliers/subcontractors	Published FY21	
	Right to work checks as part of PTIs (Pre Tender Interviews)	Completed FY20	Ongoing
	Modern Slavery Strategy and Review meetings & incorporate into company risk matrix		To be completed FY34/24
	Monthly Business Report		Commenced FY23
Training and Education	Internal staff educational training sessions	Information on Hammertech for employees & suppliers. English/Chinese posters Modern Slavery signs at all sites. Staff training days held in Syd and Melb. Intranet SharePoint portal introduced.	Ongoing
	Whistle Blower + Modern Slavery + Code of Conduct Policies distribution via Intranet (Online module)	Published FY20	Ongoing
	Site / Office Posters		To be completed



Celebrating Over 30 Years.



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