

# **Georgiou Group Pty Ltd**

## **Modern Slavery Statement**

2023-2024



## The best people to work with.

Our brand is a result of our *Georgiou Way* culture. We never compromise on safety or reputation. We pride ourselves on securing repeat work with our clients and consultants. The Georgiou Way is the collection of our values which guide the success of our business. They are our beliefs and the way we do business- including how we manage risks and engage with our stakeholders and each other.

To be *'the best people to work with'*.

This is the Georgiou Group Pty Ltd.'s (Georgiou) statement pursuant to the *Modern Slavery Act 2018* following Georgiou's review of its supply chains and operations in compliance with reporting obligations under the Act for the financial year ending **30 June 2024**.





# 1 Reporting Entity

This Statement has been prepared and submitted under section 13 of the *Modern Slavery Act 2018* (Cth) by Georgiou as a single reporting entity. This Statement will detail the strategies in place within Georgiou to continue the identification and prevention of any potential modern slavery activities within its organisation.

Georgiou remains committed to identifying and mitigating any risks associated with modern slavery practices in our supply chains and operations. We continue to strive for sustainable growth through responsible business practices and require the same of our subcontractors and suppliers through our network of partners delivering our projects throughout Western Australia, Queensland, New South Wales, and the Northern Territory.



## 2.1 Structure

Georgiou Group Pty Ltd (Georgiou, ABN 82 073 851 948) is an Australian Private Company domiciled in Australia with its registered office in Western Australia. Georgiou is 100% Australian owned, was established in 1977 and is today one of Australia's leading privately owned construction companies.

Georgiou has continued its path of growth over this reporting period, and at the end of the 2024 Financial Year Georgiou had approximately 905 directly engaged employees, with 91% of those engaged on a permanent basis.

## 2.2 Operations

Georgiou commenced its operations in 1977 as Direct Drainage, expanding in 1993 to start a precast company called Geocrete, and further in 1994 with the acquisition of Roadpave. In 1996, the three companies merged to become Georgiou Group. Today we are a national civil and building construction company with offices in Perth, Darwin, Gold Coast, Brisbane, and Sydney, providing a diverse range of civil and building construction services to government and private clients across Australia.

Unified by our commitment to the values of Care, Integrity and Excellence, we deliver civil and building construction services across Australia for sectors including transport, urban development, resources, defence, health, education, residential and commercial.

While our operations are limited to Australia, Georgiou understands the inherent risks of modern slavery practices that can arise in the construction industry through its' supply chain and local operations with exploited workforces. Minimising negative impacts on the communities and environments in which we work is integral. For Georgiou, regardless of location, client or industry, being a responsible business means being a good corporate citizen.

All executed head works contracts are with clients who are domiciled and based in Australia. Approximately 73% of Georgiou's work in hand is through State and Local Government entities with the remaining 27% for private clients. Georgiou is also engaged in a number of joint ventures with other Tier 1 and Tier 2 contractors within Australia and is an alliance partner on a number of infrastructure projects with State Government clients.



Some of our key projects during the reporting period included:

**Tonkin Gap Alliance (WA)** – an alliance with Main Roads Western Australia, the Public Transport Authority, BMD, WA Limestone, BG&E and GHD, the Tonkin Gap Project addressed bottlenecks through the Tonkin Highway in Perth where it reduced from three lanes to two lanes, significantly reducing travel times and improving safety. Associated works provide rail-enabling works for the METRONET Morley-Ellenbrook line, including underpasses and dive structures to enable trains to enter and travel along the median of Tonkin Highway.

**Toowoomba Flood Recovery (QLD)** – this project was awarded to deliver the 2022 Flood Recovery Project (North) for the Toowoomba Regional Council and restores damaged roads and culverts following floods that impacted the Darling Downs region in 2021 and 2022.

**M12 West Alliance (NSW)** – delivered in alliance for Transport for NSW with CPB Contractors, the M12 Motorway (West) Project involves construction of a 6km dual carriageway motorway and forms a key part of the Western Sydney Infrastructure Plan, designed to capitalise on the economic benefits of the Western Sydney Airport as part of an integrated transport solution for the region.

## 2.3 Supply Chain

Our brand is a result of our Georgiou Way culture, and we never compromise on safety or reputation. Georgiou is committed to working within our own business and supply chain to ensure that we implement a proactive approach to tackling hidden labour exploitation and reducing these practices in our wider supply chain. We believe collaboration is the key to combating modern slavery and endeavour to work alongside our supply chain to eradicate these practices and ensure they comply with all applicable legislative and regulatory requirements as well as actively sharing our Georgiou values.

In the 2024 financial year, Georgiou worked with 2368 direct suppliers and subcontractors, with circa 98% of these being domestic vendors, including:

- Material suppliers including concrete, steel and asphalt
- Building equipment suppliers including lifts
- Industrial consumables such as fuel
- Major plant and equipment including earthmoving equipment
- Subcontractors such as civil contractors, concreters, electricians and other tradespeople
- Labour hire
- Insurance
- Professional services
- Technology and communications

We do not manufacture our own products, and typically source products and services from suppliers and subcontractors, with Georgiou's supply chain continuing to consist almost exclusively of Australian entities. This reflects Georgiou's commitment to supporting its local and national economies to the maximum extent possible, as well as providing Georgiou with greater oversight and ability to manage any risks associated with the performance of our supply chain.

During this reporting period Georgiou has only contracted directly with four overseas entities, predominately for the provision of outsourced administrative services and the supply of specialist equipment associated with a medical building project, which makes up approximately 0.1% of its total spend.

Our contractual arrangements with our suppliers include ad-hoc transactional purchase orders pursuant to our standard Georgiou terms, as well as project specific supply subcontracts and longer-term master agreements which have been negotiated to apply throughout the business. At the end of this reporting period Georgiou spent 99% of its vendor spend domestically.

Several Georgiou vendors source components of their works from overseas entities at some point in the supply chain. The nature of the work Georgiou performs can be complex and technical, which results in varied supply chains sourcing limited or niche products or services.





**Progress Photo of M12 Motorway West**

Georgiou has continued to take a risk-based approach to identifying any potential practices that are causing, contributing to, or directly linked to modern slavery practices, and understanding our areas of vulnerability. We review the following criteria when assessing and identifying high-risk areas in our operations and supply chain:

- a. Geographical risks in sourced materials.
- b. Vulnerability of workforce population; and
- c. High risk industries and business models.

The industries we operate in within Australia are heavily regulated through both Federal and State legislation, including industrial relations, work health and safety and human rights laws. Australia has been assessed as having the lowest vulnerability to modern slavery in Asia and the Pacific, and the second lowest prevalence of modern slavery in the region according to the Global Slavery Index 2023. The Index also noted Australia has the strongest response in addressing modern slavery in business supply chains in Asia and the Pacific.

Georgiou has again assessed the potential for modern slavery within our own operations as low, with no practices that we have caused or contributed to any modern slavery practices. Georgiou is aware however that the potential remains for modern slavery to exist further down our supply chains through indirect suppliers of raw materials and equipment.

### 3.1 Procurement

Long supply chains in construction often mean that goods and services procured through compliant Australian vendors may actually prove to be a high risk of modern slavery practices. We have previously identified supply components which were sourced by Georgiou that had higher risk elements for modern slavery practices, and these remain a potential risk during the 23/24 financial year. Ongoing vigilance is required given their significance in our operations.

These potential risk areas include:

- Commodities and materials including structural and reinforced steel, cement and aggregates which may be manufactured using vulnerable migrant workers who are often low paid and low skilled.
- High risk subcontractors procured for projects such as construction labour hire, cleaning and security services that may reward the lowest price through competitive tendering with an increased risk of low skilled and low paid vulnerable workers; and
- Manufactured technical components including electronic equipment which are often manufactured in Asia which is seen to have a particularly high risk of forced labour and vulnerable populations.

Whilst Georgiou continues to source these products in their final forms from Australian suppliers contracted directly, manufacturers of individual components or entities involved in the mining and processing of raw product are often based overseas. These supply chains can be complex, consisting of a multitude of inputs from raw material extraction, processing, production, assembly, and logistics. Georgiou is cognisant that most forced labour occurs in the lowest tiers of supply chains, and this poses an ongoing challenge in understanding the risk embedded outside of the entities with which we engage directly.

Our procurement of services includes activities associated with corporate support such as accounting and legal services and professional consulting services such as design and engineering, which compliment our internal resources for either project specific or more long-term secondments as required.

### 3.2 Personnel and Operational Practices

Construction is identified as being a high-risk industry for the exploitation of forced labour according to the international human rights group Walk Free. Georgiou's workforce is based in Australia and protected by the following mechanisms:

- Assessed industrial instruments.
- Modern Awards.
- The National Employment Standards.
- Various State and Territory work health and safety regimes.
- Georgiou's own policies including those specific to Employee and Industrial Relations, Workplace Discrimination, Diversity and Equal Opportunity and a suite of Workplace Health and Safety policies underpinned by our Safety is My Way program

which aims to foster and promote our safety culture through recognition of those whose personal behaviour positively influences this aim.

Georgiou maintains stringent people controls throughout our operations including within our governance framework of policies and procedures, as well as our human resource and recruitment practices as detailed in section 4.



## 4 Actions taken by Georgiou to Assess and Address the Risks

Georgiou has maintained its continuous improvement approach to reviewing and developing its systems and processes to combat any risk of modern slavery practices within our business. We have consolidated the changes made during the previous periods and continue to review and develop these to ensure a robust integrated framework of governance, systems, processes, and culture to eradicate modern slavery risks from our operations and supply chains.

We have continued our stringent approach to due diligence within our procurement practices, through our established procurement procedure. Georgiou has developed and solidified the existing procurement mechanisms as follows:

- i. Refinement of our pre-qualification process with our Vendor Precontract Assessment which includes a mandatory modern slavery questionnaire to identify whether vendors are assessing modern slavery risks within their own organisations and the mechanisms they have in place to identify and action any modern slavery risks. This assessment is completed where a new vendor is sourced and thereafter every 3 years for existing vendors.



- ii. The roll-out of our updated suite of standard subcontract agreement templates to ensure its alignment to the current Modern Slavery Act, as well as requiring a warranty from our subcontractors for compliance with the Act at all times. Our subcontract agreements also contain several positive obligations for the subcontractor in relation to modern slavery risk management which are subject to audit, including:
  - a. Ensuring its sub-subcontractors and supply chains' compliance with the Act.
  - b. An obligation to take all reasonable and necessary steps to identify, investigate and eliminate modern slavery in its operations and supply chains.
  - c. Provision of information and assistance required by Georgiou to enable our own compliance under the Act; and
  - d. Notification obligations to Georgiou in the event it becomes aware of any modern slavery breaches within its organisation or supply chain.
- iii. An extended due diligence process for overseas vendors, with a Modern Slavery Questionnaire requiring detailed analysis of organisational structure, supply chain, relevant processes, training and response to allegations of modern slavery which completed by vendors and risk assessed by procurement teams as part the selection process.
- iv. Georgiou has continued to review our high value and/or high-risk vendors as further detailed in item 4.4.

## 4.2 Training

Georgiou has rolled out its Commercial Acumen training suite across the organisation throughout the reporting period and continues to expand the content of this suite and provide mandatory refresher sessions. The training suite consists of 10 commercial specific packages, including the updated procurement lifecycle which details our due diligence requirements for all forms of procurement throughout the organisation. This training is being delivered in-house across all roles within the organisation which have input into any stage of the procurement process.

Additionally, mandatory unconscious bias training for all managers and employees in roles with a recruiting responsibility has been implemented, as driven through the Diversity Committee, to allow our people to better understand the impact of unconscious bias on hiring, promotion, performance management and succession management.

## 4.3 Employment Practices

Georgiou has well established human resource and recruitment processes and practices to ensure we uphold our vision to be 'the best people to work with' and mitigate any potential susceptibility to modern slavery practices. Our recruitment process involves comprehensive employment checks to ensure all prospective employees hold the required working rights for their employment within Australia. Our Induction and Orientation Procedure sets out core training required to be completed by all new employees within 4 weeks of their commencement, including awareness of Georgiou's Code of Conduct.

Georgiou understands that construction labour sourced through labour hire companies may be at higher risk of an exploited vulnerable workforce, including underpayments or non-

payment of entitlements. To combat this risk, Georgiou's People and Capability team undertake a robust due diligence process with all new labour hire vendors, and review this on an annual basis, assessing labour companies to ensure payments and entitlements are made in accordance with the applicable award or industrial agreement and the appropriate rights to work are in place for all personnel. Only once a labour hire vendor has met all due diligence requirements is an agreement negotiated and made available for use by the business.

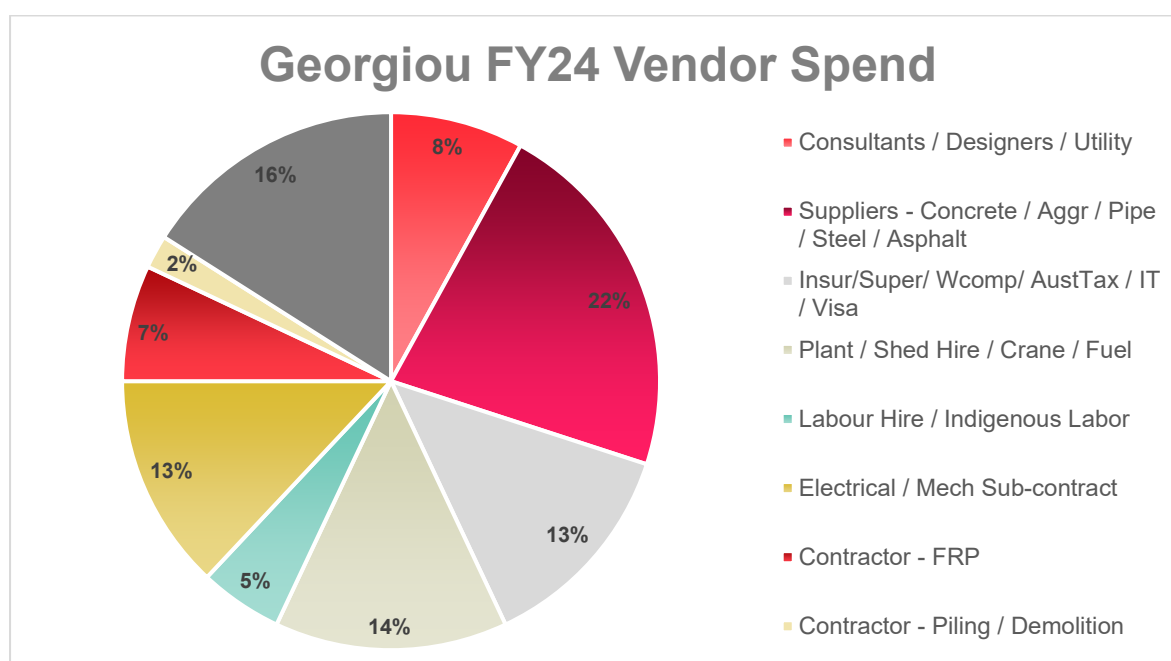
The Georgiou Diversity Committee has continued and been strengthened with new dedicated Diversity Champions who perform contact roles within the organisation to promote and encourage an inclusive workplace culture. Current initiatives include:

- internal and external annual pay parity audits
- greater diversity reporting at Board and leadership levels
- the ongoing review and further refinement of flexible working arrangements; and
- a greater commitment to creating a family-friendly environment for all employees through paid parental leave, including paid and unpaid leave available to primary and secondary carers.

As part of our ongoing commitment to equitable remuneration practices, Georgiou obtains an external independent review of our current remuneration practices with a specific focus on gender equity for pay parity each year, as well as reporting against the Workplace Gender Equality Act statutory obligations. We can confirm Georgiou has received its Certificate of Compliance with the Workplace Gender Equality Act for the 2023/2024 reporting period.

## 4.4 Supply Chain Analysis

Georgiou has continued its yearly review against key and high-risk vendors to progressively address any potential for exposure to modern slavery in its business and supply chain. During our supply chain analysis, we assessed all vendors and grouped these by type to give us a snapshot of risk areas, which are represented in the graph below:



As a result of the analysis of our supply chain, Georgiou identified that its' top ten subcontractors and suppliers by spend account for approximately 29% of its overall spend on vendors. Most of these vendors are large, Australian based companies who provide materials sourced from within Australia or the provision of labour and services including subcontractors who are completing discreet scopes of work on our projects.

During this reporting period Georgiou again identified high value and high-risk vendors (such as those operating and based overseas) for review to identify any potential exposure in their supply chain network, as well as nominating their policies and procedures to mitigate risk of modern slavery and the course of action if such risks are identified.

Once again Georgiou has engaged with limited overseas-based entities through the reporting period. Those engaged predominantly provided outsourced administrative services from the Philippines, with one US based entity supplying specialist medical equipment for a hospital facility project.

In regard to the administrative support entity in the Philippines, Georgiou has a contract on foot which requires this entity to engage employees within the relevant laws of the Philippines and ensures pay and conditions are better than the required minimum standards in their country of origin. This supplier has its' detailed Modern Slavery Policy in place which identifies the perceived risks within its organisation, how it manages its risks of modern slavery practices and provides for disciplinary action for breaches of the policy, applicable to their own organisation as well as their supply chain. Georgiou regularly reviews the employment and payment information to confirm compliance in this regard.

Any international supply contracts are thoroughly vetted at the procurement stage with the entity required to complete a Modern Slavery Supplier and Subcontractor Questionnaire to identify and assess any modern slavery risks, identify mitigation efforts to combat these risks and foster collaboration between Georgiou and the supplier to address these risks.

Aside from these limited international contracts, we again found the significant majority of entities that we engage with employ labour and source their materials from within Australia, with no evidence of any goods or services procured from overseas suppliers who had not been thoroughly vetted for modern slavery practices. All entities reviewed screen suppliers to assess modern slavery risks and have some form of ethical sourcing process which ties into their procurement and subcontractor management processes.





## 4.5 Corporate Governance

We operate within an established corporate governance system with its foundations in our collection of values and principles known collectively as *The Georgiou Way*. Policy and governance are set by the Board of Directors and Executive team, which includes our Chief Risk Officer and National People & Capability Manager. The suite of policies relevant to identifying and preventing modern slavery risks and practices within our organisation includes the following:

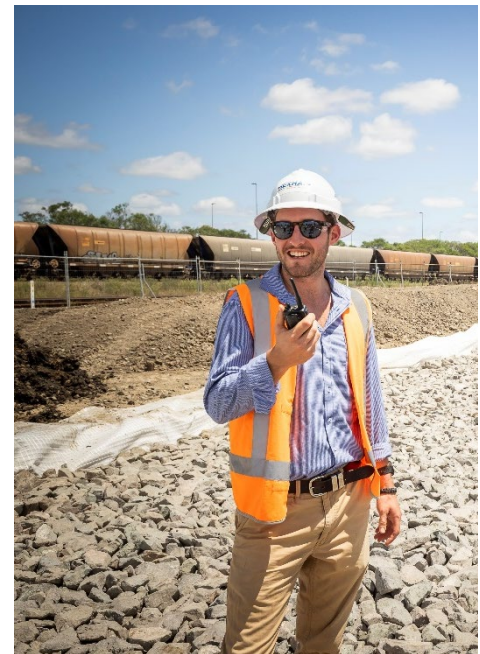
- Workplace Discrimination Policy which expressly includes provision that “Georgiou does not employ forced, bonded or child labour”.
- Sustainability Policy- Georgiou retains a key focus on its commitment to sustainable practices and manages its operations to minimise environmental and social impacts while integrating sustainability principles and practices into the business, with sustainable objectives and targets established within the organisation.
- Code of Conduct which applies to all Georgiou employees, subcontractors, suppliers, and consultants. All parties to this Code of Conduct are expected to act consistently with fundamental Georgiou values, ethical behaviour and accountability and transparency in our conduct, with protections against conflicts of interest and bribery in our business and supply chain.

## 4.6 Whistle-blower Hotline

The Georgiou Whistle-blower Hotline remains an independent and confidential service available to all employees, contractors, and stakeholders to receive information relating to improper conduct, unlawful or unethical behaviour and supports Georgiou’s values, principles and Code of Conduct. Georgiou has retained Stopleveline to facilitate the hotline and is committed to the protection of whistle-blowers against action taken in reprisal for the making of protected disclosures.

Stopleveline enables parties to report suspected misconduct via phone, email, internet, or mail and is available on a free of charge 1300 number within Australia 24 hours a day, 7 days a week. Calls are answered by a Stopleveline investigator during business hours (Australian Eastern Standard Time), and otherwise responded to within one working day.

There were no reports made to the Stopleveline hotline regarding modern slavery or any other unethical or unlawful behaviours at Georgiou during the reporting period.





## 5 Measuring the Effectiveness of Georgiou's Actions

This is Georgiou's fourth report under the Modern Slavery Act, and in this period, we have focussed on the roll out and embedding of our updated and developed processes and practices throughout our business, as well as the review and assessment of our supply chains' policies and procedures.

Consolidating the previous reporting periods' key performance indicators and successes, Georgiou has established the following framework to measure the effectiveness of our actions to identify, assess and mitigate the risks of modern slavery:

- i. Continue to conduct annual surveys of key high value or high-risk suppliers and subcontractors, as well as any suppliers and subcontractors who may sit outside the nominated spend cap but who are identified as having extended or overseas supply chains, to enable us to understand and take appropriate action on any modern slavery risks.
- ii. Audit of our supplier due diligence process and assessments at the procurement phase to ensure these are appropriately actioned and remedied as required.
- iii. Continuing to update our standard form contract suite with up-to-date compliance requirements for modern slavery laws and practices and ensuring compliance with Georgiou's Code of Conduct.
- iv. Continue to monitor the Stopleveline whistle-blower hotline for any modern slavery concerns reported, and ensuring reports on complaints are dealt with appropriately and our investigation process is adhered to.
- v. All mapped roles for commercial acumen, procurement and unconscious bias training have been completed, with regular refresher training undertaken.

## 6 Consultation Process and Moving Forward

Georgiou Group Pty Ltd is a single reporting entity in accordance with the requirements of the Act, so mandatory reporting criteria six regarding consultation is not applicable to Georgiou. However, Georgiou's Leadership Team continues to ensure that all policies and procedures conform to legislative and regulatory requirements and are in accordance with the Georgiou Values & Principles.

The Leadership Team, through its delegated Business Unit leaders, have actively ensured all project and support staff understand the importance and implications of this Act on our business via these policies and procedures as standard operating practices. Project and support teams have cascaded these requirements onto our third-party vendors through our project documentation and via publication of our processes, policies, and our Modern Slavery Statement on our publicly accessible internet site.

Georgiou is committed to the continuous development and improvement of our policies and processes as they relate to modern slavery, with the support of the Board of Directors, the Executive team and cascaded through our organisation to the projects being completed. Our plans for action over the next reporting period and beyond as set out in this statement demonstrate our commitment to effectively identifying and addressing potential risks of modern slavery in our organisation and in our industry.

Our commitment to being *'the best people to work with'*.

Criteria	Item / Section
<b>Identify the reporting entity</b>	1
<b>Describe the reporting entity's structure, operations and supply chains</b>	2
<b>Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entity it owns or controls</b>	3
<b>Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes</b>	4
<b>Describe how the reporting entity assesses the effectiveness of these actions</b>	5
<b>Describe the process of consultation with any entities the reporting entity owns or controls</b>	6
<b>Provide any other relevant information</b>	2-6

It is on this basis that Georgiou's Board of Directors have reviewed and approved this statement prior to its submission.

This statement for the Financial Year 2023/2024 was approved by the Georgiou Group Pty Ltd Board of Directors.

DocuSigned by:



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Gary Georgiou

**Chief Executive Officer**

For Georgiou Group Pty Ltd





**People.  
Partnerships.  
Excellence.**