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MODERN SLAVERY STATEMENT

OVERVIEW

McCormack's commitment is to comply with the requirements of the Modern Slavery Act 2018 by limiting, or where possible eliminating, the risk of modern slavery occurring within its own business, infiltrating its supply chains or through any other business relationship.

Introduction

McCormack qualifies as a reporting entity as defined by the Modern Slavery Act 2018 and this statement is submitted as a response to the criteria as outlined for these statements. This statement applies to the entities as listed under The McCormack Property Services Unit Trust.

Our business continually reviews its policies and procedures to ensure their compliance to legislation and regulations and its practices are in line with the mission and values of the business.

This is our first Modern Slavery Statement, and its preparation has provided us reflection time to review our suppliers in terms of their views to human rights and how we can continue to look for opportunities to improve.

Approval

This statement is endorsed and approved by the Board of Directors of McCormack on 5th of September 2024.



Greg McCormack
Managing Director



Wade McCormack
Director of Operations



Lauren McCormack
Director



Brad McCormack
Director

STATEMENT UPDATE

Update Table

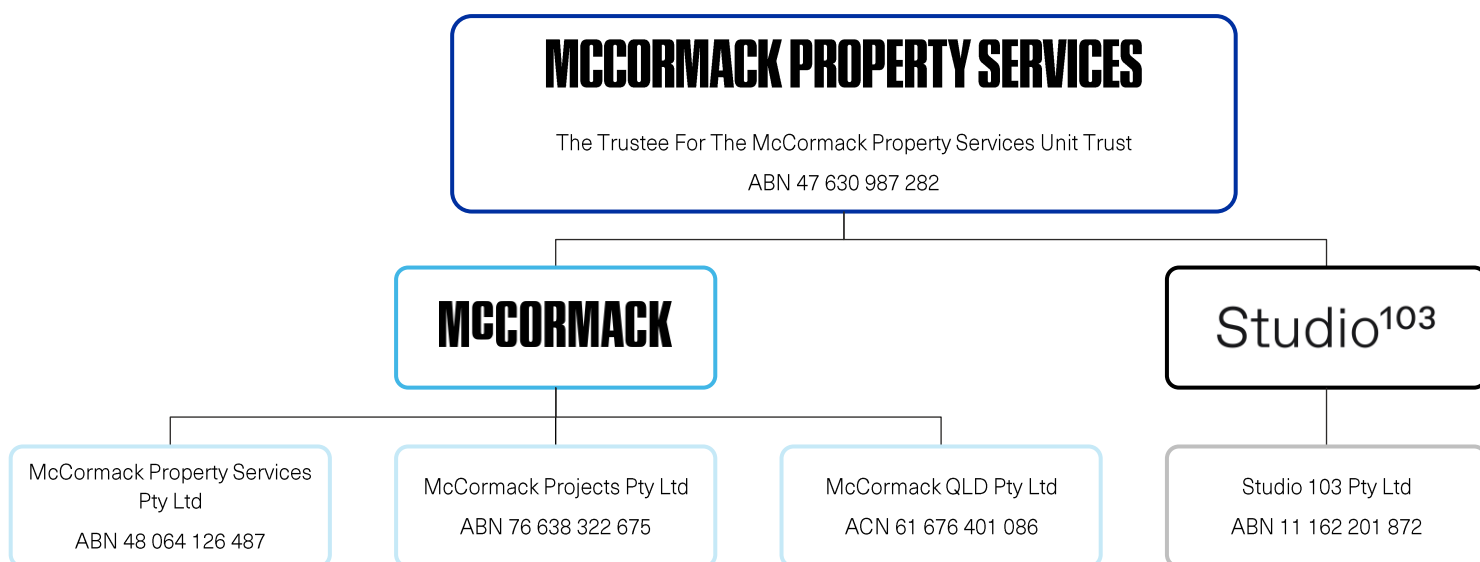
Change Date	Explanation
April 8, 2024	The statement has been updated to reflect the addition of our Queensland operation to the McCormack business. This is reflected in the Structure and Operations section of this statement

STRUCTURE & OPERATIONS

Structure

McCormack operates in Victoria (McCormack Property Services Pty Ltd and Studio 103 Pty Ltd), New South Wales (McCormack Projects Pty Ltd) and Queensland (McCormack QLD Pty Ltd). We are 100% owned by our directors, who are actively involved in the management and operations of the business. McCormack is registered at 312-314 Hoddle Street, Abbotsford Victoria 3037.

The reporting entities are listed as follows:



Operations

McCormack's primary business is as a head contractor working across the Commercial, Education, Government, Health, Hospitality, Industrial sectors specialising in Fit-out and Refurbishment, Asset Repositioning, Construction, Design and Construct and Heritage Restoration. McCormack's operations are Australian based, namely in Victoria, New South Wales, and Queensland.

McCormack operates under its Integrated Management System that is certified to the Australian Safety Standard (ISO 45001), Quality Management System (ISO 9001), and Environmental Management System (ISO 14001). Regular reviews and internal audits are conducted to continually improve and to ensure its effectiveness and ongoing relevance.

Studio 103 is an interior design practice specialising in commercial interiors, residential and hospitality services.

McCormack's policies and procedures are in place to ensure compliance with applicable Health and Safety, and Labour legislation, regulations, and standards, such as Health and Safety Act 2011, the Fair Work Act 2009, and Modern Slavery Act 2018.

All employees are inducted and acknowledge the company's policies including but not limited to; Bullying & Harassment, Equal Employment Opportunity, Modern Slavery, Social Responsibility, Young Workers, and the Code of Conduct that applies to all its employees. These policies are also reviewed annually for statutory compliance and relevance.

SUPPLY CHAIN

Engagement

McCormack engages subcontractors and suppliers as part of its head contractor responsibilities for the delivery of projects on behalf of the client or client project management, approximately 95% of its total expenditure, and for its business use.

The former is managed through McCormack's Contractor Management System where the third-party provider is required to answer a prequalification questionnaire with regards to their management of activities (including Health and Safety, and Labour), compliance to legislation and regulations (including the Fair Work Act and Modern Slavery Act).

They also acknowledge as having read and understood the McCormack policies (including Modern Slavery) to be adhered to and the uploading of relevant licences and insurances.

Studio 103 recommends suppliers to their client to use in their projects but do not engage them directly. These suppliers are issued a questionnaire with regards to their management of activities relating to Labour and Human rights and requested to acknowledge its Supplier Code of Conduct.

The risk of modern slavery existing in the business's operations and supply chain is low, as McCormack and Studio 103 solely operates in Australia as do most of its subcontractors and suppliers. Our Supplier Code of Conduct outlines the obligations and commitments required of subcontractor and suppliers that are engaged by McCormack or recommended by Studio 103 including those relating to Labour and Human rights.

McCormack and Studio 103 acknowledges that regular reviews of our subcontractor and supplier base are required to ensure adherence, where required, to the Modern Slavery Act. This review process is conducted annually prioritising those that engage in activities outside of Australia.

Operational Procurement

Over 95% of McCormack's procurement is operational supporting the projects that McCormack delivers to our clients via the various contract types.

- Design and Construct (D&S)
- Lump Sum (LS)
- Managing Contractor (MC)

McCormack has established a preferred subcontractor list requiring them to undergo a vetting process through its Contractor Management System and all newly engaged subcontractors are required to be approved by the relevant McCormack representative with the appropriate level of authority against specific criteria.

Corporate Procurement

Corporate procurement relates to internal use by McCormack and Studio 103 team members and careful consideration is given to reputable suppliers.

Category of expenditure:

- Office stationery and equipment – supplied by Office Works a subsidiary of Wesfarmers.
- PPE and corporate clothing apparel – supplied by Access Work Wear a subsidiary of Wesfarmers.
- Staff amenities – supplied by Woolworths.

Suppliers Recommended

Studio 103 maintains a preferred supplier listing that are recommended to clients, through their interior design, for use on projects managed by their clients.

This Supplier list has a record of the completed a questionnaire and the acknowledgement to our Supplier Code of Conduct and a review of Labour and Human rights compliance is conducted annually for those that engage in activities outside of Australia.

Effectiveness of Risk Mitigations

McCormack and Studio 103 labour engagement and management policies and practices are structured strictly in accordance with the relevant laws, the risk of McComack directly causing modern slavery is considered low.

McCormack and Studio 103 acknowledges that it is at risk of contributing to modern slavery through the activities of other entities that we have a business relationship with, namely our suppliers and subcontractors. Further, supply chain partners of our direct suppliers and subcontractors also present a risk, where materials are sourced from overseas regions.

McCormack and Studio 103 have set up an annual review of its major subcontractors and suppliers, engaged in the delivery of projects on behalf of clients, to ensure continued compliance to its contractor management and supplier requirements.

Project performance reviews of subcontractors are conducted at the completion of projects and handover to the client. It has also taken steps to evaluate its suppliers of business-as-usual supplies to ensure that any risks are understood, and steps put in place to mitigate.

CONSULTATION PROCESS

Communication & Consultation

The McCormack Social Responsibility Committee is chartered to review matters relating to environmental sustainability, reconciliation action plan, health and wellbeing, and human rights. Consultation with external experts in these areas is an essential step in responding to any identified risks and compliance requirements.

The coordination and communication of initiatives undertaken, changes to policy/procedures, and updates are assigned to the relevant team members to ensure that consultation, and awareness programs are conducted. Agreed system changes and improvements, resulting from these consultations are approved by McCormack's directors and communicated business wide.

FURTHER INFORMATION

McCormack is one of Australia's leading family-owned building services companies. Established over fifty years ago by Jack McCormack, family values remain at the core of the business. It started as a small operation in 1969 and has grown into an expansive construction business operating across all sectors. A commitment to safety, quality, and building relationships resonates from the Directors (all family members) to every team member at McCormack.

It continually strives to be better every day, remaining true to its culture and values whilst developing the awareness and competencies of its team members. The establishment of working groups to review policies, practices, systems, and social responsibilities not only ensures a practical lens but a continuous improvement commitment across the business.