



## MODERN SLAVERY STATEMENT

### REPORTING ENTITY

Spaceframe Buildings Pty Ltd (“Spaceframe”) is a family owned, limited liability building company specialising in design and construction of industrial and commercial developments and cold storage facilities. Spaceframe has offices in Brisbane and delivers projects throughout Australia. Design of all buildings is done in-house with specialised draftspersons and engineers. Spaceframe then engages trade specialist subcontractors to supply and install all aspects of each construction.

### Scope

This Statement applies to all Spaceframe’s business operations and associated subcontractors and suppliers within Spaceframe’s supply chain.

### Applicable Law

This Statement supports the intent of international conventions, treaties, and protocols relevant to combatting modern slavery and the Modern Slavery Act 2018.

### Introduction

Modern slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom. It includes exploitations including human trafficking, slavery, servitude, forced labour, forced marriage, debt bondage, child labour, and deceptive recruiting. It also includes actions of other parties who are involved in supporting financial or commercial transactions or contributing to any business or undertaking involving servitude and slavery.

This Statement affirms our commitment to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations. Management is firmly committed to complying with equal opportunity and anti-discrimination legislation.

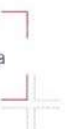
It is consistent with our ethical framework, that expects a culture of high ethical standards, including compliance with applicable laws, contractual and other obligations.

### Commitment

Slavery, including any situations of exploitation where a person cannot refuse or leave work because of threats, violence, coercion, abuse of power, or deception, and human trafficking, is abhorrent and Spaceframe is committed to ensuring that it is absent from Spaceframe’s business and its supply chain. Spaceframe’s respect for human rights refers to internationally recognised human rights – understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. To demonstrate its commitment to anti-slavery, Spaceframe shall:

- seek to identify and risk mitigate any adverse human rights impacts that Spaceframe may cause

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or contribute to through its own business activities, or which may be directly linked to its operations by its business relationships.

- avoid causing or contributing to adverse human rights impacts through its own business activities and address such impacts when they occur.
- seek to prevent, or mitigate, adverse human rights impacts that are directly linked to Spaceframe's design and construction operations and by its business relationships, even if they may not have knowingly contributed to those adverse impacts.
- exercise a due diligence process to identify, prevent, mitigate, and account for how Spaceframe addresses possible impacts on modern slavery and human rights; and
- exercise management system processes to enable the remediation of any adverse human rights impacts to which Spaceframe, or its subcontractors and suppliers may contribute.

## **Suppliers**

We expect that our suppliers must use best endeavours to ensure that there is no modern slavery in their supply chains and operations. In the event suppliers identify any occurrence of, or material risk of modern slavery in their supply chains or operations, they are to take practical and effective steps to address that occurrence or risk. Suppliers must notify our business as soon as practicable of any occurrence of, or material risk of modern slavery they have identified and notify relevant authorities where appropriate.

## **Statement of Risk Appetite**

Spaceframe has a zero tolerance of slavery in all its forms. This means that Spaceframe has no appetite for causing harm to persons, damaging its reputation, being subject of legal action or incurring financial loss or standing in the business community arising from a failure to comply with the Law set out in the Modern Slavery Act 2018.

Spaceframe's policies, management system processes, procedures, controls, and risk mitigation strategies are designed to reduce the risk and the prevalence of modern slavery.

## **Ethical Investments**

Our business seeks to ensure that no investment should knowingly be made in companies who engage in activities or services which could be directly viewed as compromising the intent of this Statement.

## **Reporting concerns of modern slavery**

A key part of supporting ethical standards is enabling our workers and suppliers to feel free and safe to speak up when there are reasonable grounds to suspect that our business or related persons are not acting ethically or in accordance with laws and obligations.

In Australia, the Australian Federal Police is responsible for investigating suspected cases of modern slavery and can be contacted on 131 444 to discuss or report a suspected case. Contact can be made anonymously.

## **Application Of this Statement**

We seek the co-operation of all workers, suppliers and other parties working with our business. We encourage suggestions for realising our equal opportunity and anti-discrimination objectives to create a fair and tolerate working environment.

This Statement applies to all business operations and functions, including those situations where workers are required to work at any site not controlled by our business.

## Approval of this Statement

The Board of Directors, being the principal governing body of Spaceframe Buildings Pty Ltd, constituted by Jane Raspotnik, Peter Raspotnik, Werner Raspotnik and Lisel Pringle, have formally approved this Modern Slavery Statement by a meeting of the board of directors, on 10 September 2020.

## How Spaceframe Combats Slavery

In order to combat slavery, Spaceframe has taken the following steps to demonstrate compliance with the Modern Slavery Act:

- Spaceframe Directors and Senior Management have performed a risk assessment to identify those parts of the business operations and supply chain where there may be a risk of modern slavery taking place. The risk assessment is performed annually, and the outputs and actions are reviewed by Spaceframe's Board of Directors. Spaceframe considers itself to be at "low" risk of slavery arising (meaning that it is either unlikely, or known, that slavery is not occurring), but Spaceframe is not complacent and as a result of the risk assessment has identified sensible, risk based measures to reduce identified risk to within the Boards stated level of risk appetite.
- Persons employed by Spaceframe have a formal contract of employment, to reduce risk of forced labour occurring. Failure to act in accordance with this Anti-Slavery Statement may result in disciplinary action being taken.
- Spaceframe has implemented and identified further checks in supply chain (principally those involved in providing subcontracted services and supply of construction related goods and services to Spaceframe) to reduce the risk of slavery occurring. Further actions have been identified that will, when implemented, require participants in the supply chain to attest to an absence of non-compliant activity; to sign contracts/agreements that require compliant behaviour and to report slavery related issues/non-compliances to Spaceframe, and Spaceframe shall carry out remedial steps where modern slavery is identified.
- Spaceframe will provide training for staff on modern slavery risks and impacts and
- Spaceframe shall publish this Anti-Slavery Statement on its website (for subcontractor and supplier access/reference when tendering), as a means of communicating Spaceframe's due diligence processes and commitment in relation Modern Slavery Act 2018 compliance.
- Spaceframe stipulates anti-slavery and human rights expectations to staff, business partners and other parties directly linked to Spaceframe's operations.
- Spaceframe shall ensure that this Anti-Slavery Statement is available and communicated internally and externally to all personnel, business partners and other relevant parties and is reflected in operational policies and procedures necessary to embed it throughout the business.
- Spaceframe will formally review performance against this Statement annually with the intention to continually improve the effectiveness of the systems used to minimize the risk of noncompliance to the Modern Slavery Act 2018.



Jane Raspotnik – Director