

Modern Slavery Statement

FY 21

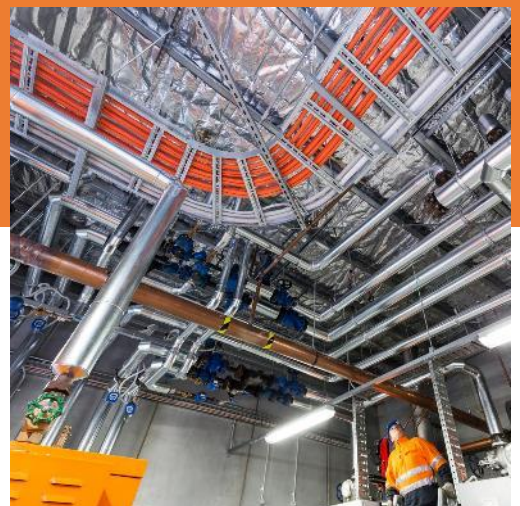


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Managing Director's

Introduction



The A.G. Coombs Group of Companies is committed to being an exemplar corporate citizen; respecting human rights is inherent throughout our business operations and is embedded in our core values. The A.G. Coombs Group of Companies are absolutely committed to taking positive steps to ensure that modern slavery is not present in our operations and to ensure our supply chains are free from modern slavery.

The A.G. Coombs Group of Companies has several relevant Policy Statements, including our Modern Slavery Policy Statement, Code of Conduct Policy Statement, Supplier Code of Conduct Policy Statement, Supplier Diversity Policy and associated supporting Procedures.

We recognise that as a significant purchaser of goods and services, our choices can impact communities and individuals. We recognise our responsibility to engage with suppliers who act ethically. We do not tolerate slavery, human trafficking, forced or child labour or child exploitation.

We recognise that preventing modern slavery is a complex issue and in recognition of this we have implemented the following measures:

- Provided high level training to the executive team and relevant employees, as well as the Board of Directors in relation to Modern Slavery.
- Developed and implemented processes to monitor and audit our supply chain, including a requirement that all our supply chain comply with Modern Slavery Legislation.
- Designated key personnel with responsibility to manage and implement key processes and procedures.

Our goals for the coming years also include:

- Additional and ongoing training to relevant employees.
- Implementing further controls in our procurement process and undertaking diligence activities across our supply chain.

This statement demonstrates our alignment to the Modern Slavery Act to address slavery, human trafficking, forced or child labour or child exploitation across our supply chain. We acknowledge we have further work to do, however we are building from a solid foundation to support our future goals and commitments in addressing modern slavery.

This statement for A.G. Coombs Group Pty Ltd was approved by the Board of A.G. Coombs Group Pty Ltd as the parent entity on 29, June 2021.



Russell F. Telford
Managing Director
A.G. Coombs Group Pty Ltd

Our Structure, Operations

And Supply Chain

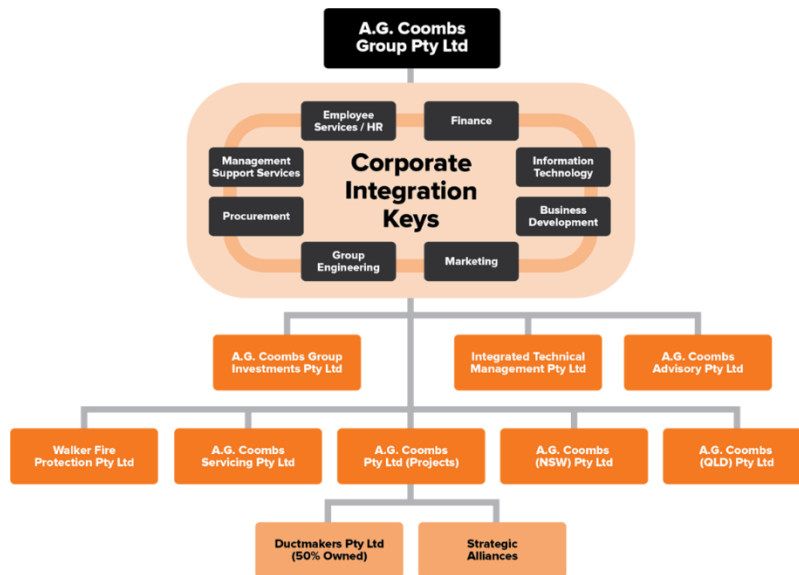


The reporting entity is A.G. Coombs Group Pty Ltd and this statement relates to the following A.G. Coombs Group of Companies:

Company Name: ABN Postal Address: Phone:	A.G. Coombs Pty Ltd (Head Office) ABN 49 005 653 332 26 Cochranes Road Moorabbin Vic 3189 +61 3 9248 2700	Company Name: ABN Postal Address: Phone:	A.G. Coombs Pty Ltd (NSW Office) ABN 49 005 653 332 Unit 6 4 Avenue of the Americas Newington NSW 2127 +61 2 8020 6000
Company Name: ABN Postal Address: Phone:	A.G. Coombs Pty Ltd (QLD Office) ABN 49 005 653 332 Level 1 North Tower, 540 Wickham Street Fortitude Valley QLD 4006 +61 7 3848 0500	Company Name: ABN Postal Address: Phone:	A.G. Coombs NSW Pty Ltd (Head Office) ABN 60 134 239 768 Unit 6 4 Avenue of the Americas Newington NSW 2127 +61 2 8020 6000
Company Name: ABN Postal Address: Phone:	A.G. Coombs ACT Pty Ltd (Head Office) ABN 96 105 075 858 Unit 106, 27 Lonsdale Street Braddon ACT 2612 +61 2 6217 5600	Company Name: ABN Postal Address: Phone:	A.G. Coombs QLD Pty Ltd (Head Office) ABN 62 134 239 777 Level 1 North Tower, 540 Wickham Street Fortitude Valley QLD 4006 +61 7 3848 0500
Company Name: ABN Postal Address: Phone:	A.G. Coombs Advisory Pty Ltd ABN: 89 130 969 934 26 Cochranes Road Moorabbin Vic 3189 +61 3 9248 2700	Company Name: ABN Postal Address: Phone:	Walker Fire Protection Pty Ltd (Head Office) ABN 21 006 028 673 Unit 5 273 Williamstown Road Port Melbourne Vic 3207 +61 3 9279 7100
Company Name: ABN Postal Address: Phone:	Integrated Technical Management Pty Ltd (Head Office) ABN: 96 105 075 858 26 Cochranes Road, Moorabbin Vic 3189 + 61 3 9248 2700	Company Name: ABN Postal Address: Phone:	Integrated Technical Management Pty Ltd ABN: 96 105 075 858 Unit 106, 27 Lonsdale Street, Braddon ACT 2600 + 61 2 6217 5600
Company Name: ABN Postal Address: Phone:	A.G. Coombs Servicing Pty Ltd ABN: 57 053 933 056 2/435 Williamstown Road, Port Melbourne Vic 3207 + 61 3 9676 4600		

Our Structure and Operations

The A.G. Coombs Group of Companies corporate structure is outlined below.



The A.G. Coombs Group of Companies (A.G. Coombs) commenced operations in 1945, with a 75-year plus heritage, and is proudly Australian owned and operated. A.G. Coombs provides an end-to-end capability; an integrated range of technical services for all systems in buildings, from advisory and design through to installation, commissioning, maintenance and ongoing operation and management, delivered through our specialist companies.

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Trusted and respected major projects provider in HVAC, mechanical and multi-service design, construct, installation and commissioning on many of Australia’s more significant buildings/developments.
- 

Highly valued technical services and engineering advice to assist building owners and managers improve building performance, optimise energy efficiency and meet regulatory obligations.
- 

Responsive high quality 24/7 maintenance services for all building services and systems – delivering safe, efficient and reliable buildings.
- 

Operationally focused solutions for the management, planning and delivery of integrated technical building services for improved performance outcomes and cost management.
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Experts in complex, high-risk and mission critical sites, in the delivery of professional engineering and regulatory advice, fire systems design, installation and maintenance.

Our website provides more detailed information about our business, including our strategy, products and operations, as well as our approach to sustainability. www.agcoombs.com.au

Our Supply Chain



We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that any form of slavery is not taking place in our own business or supply chains.

With our head office based in Victoria, A.G. Coombs utilises its strong network of existing Suppliers and Manufacturers across the Eastern Seaboard of Australia, to maximise local industry participation in its supply chain.

Goods and services are purchased by the A.G. Coombs Group of Companies Procurement Department and procurement team, to deliver works to our Clients. These are sourced through a network of Suppliers and Subcontractors. During the reporting period, A.G. Coombs procure goods and services from over 2,000 direct Suppliers. Most of our Suppliers are based in Australia.

We aim to play a positive role in the communities where we operate. We strive to buy local products and engage local services. As part of our commitment to local procurement, we ensure that opportunities for local industry and supplier engagement are disseminated through various channels.

We also ensure that local industries and Suppliers in the areas in which we operate throughout Australia are identified and approached to increase local content where possible in the delivery of our services.

Our Modern Slavery

Risks



A.G. Coombs has undertaken a Modern Slavery Risk Assessment over our operations and supply chains to identify and assess potential areas of Modern Slavery risk. The identified risks are being removed or mitigated via a range of methods including:

- Only approved Suppliers can be engaged to provide goods / services to the A.G. Coombs Group of Companies.
- A long established, robust approval process is in place to ensure that only suitably qualified and experienced organisations are engaged, and that roles, responsibilities, expectations and policies are clearly communicated.
- Only Proprietary Limited companies can be added to our Approved Suppliers list.
- Our standard terms and conditions for all Purchase Orders clearly states the Modern Slavery obligations of the Supplier when being engaged by the A.G. Coombs Group of Companies.
- Surveying and random spot checking of our Suppliers confirms their understanding, commitment and compliance to Modern Slavery practices. We have recently implemented a Supplier and Subcontractor self-assessment questionnaire about modern slavery into our prequalification process. All new Suppliers and Subcontractors are required to complete this self-assessment questionnaire as part of our prequalification process. We are also rolling out this self-assessment questionnaire to our existing Supplier and Subcontractor base.
- Training on Modern Slavery is provided to all key personnel who engage and interact with our suppliers, including Procurement Teams, Estimators, Project Managers and Contract Managers.

Our Response to COVID-19



The A.G. Coombs Group of Companies are a recognised provider of essential services operating within the current and evolving guidelines of relevant authorities to provide all facets of building services.

We are in contact and working with various elements of government and are represented on industry boards and associations, including Chair of the Facilities Management Association of Australia (FMAA), President of Air Conditioning & Mechanical Contractors' Association (AMCA) and working closely with all relevant authorities.

The A.G. Coombs Group of Companies are working closely with our clients, service providers and suppliers, noting COVID-19 has impacted supply chains across the world, to ensure we continue to deliver our services.

We are managing a coordinated plan to assure the health and wellbeing of our Employees, as well as **COVID-19** Business Continuity Plans to ensure we continue to operate effectively for our valued clients and industry partners. We continue to evolve service delivery in line with the rolling changes flowing as a result of the **COVID-19** pandemic.

We continue to monitor and follow the directions and requirements as prescribed by the Government as the protocols required to be followed ramp up and down in terms of supply chain. These frequently changing requirements are dealt with in a dedicated A.G. Coombs Group of Companies Business Leadership Forum, convened at least weekly, with a specific agenda focussed around the impacts of **COVID-19** to keep our people safe and continue our operations throughout the COVID-19 pandemic.

Reporting and Assessment

On the Effectiveness of these Actions



This Statement outlines the steps the A.G. Coombs Group of Companies has and continues to implement measures to ensure Modern Slavery is not taking place across our supply chain. We continue to undertake random spot checking of our Suppliers and conduct an annual Modern Slavery Risk Assessment to monitor changes and trends in our risk profile across both our operations and supply chain to ensure our approach to risk identification and assessment remains effective.

Consultation

Across the A.G. Coombs Group of Companies



Mr Russell Telford is the Managing Director of the A.G. Coombs Group of Companies which includes each business entity. The A.G. Coombs Group of Companies has a Board of Directors, consisting of Executive and Non-Executive Directors. The A.G. Coombs Group Board meet monthly.

The A.G. Coombs Executive Team, which includes the General Managers of each A.G. Coombs entity are members of the A.G. Coombs Advisory Board, chaired by the A.G. Coombs Group Managing Director, which also meets monthly.

A.G. Coombs has an established committee to manage our Modern Slavery practices to ensure they are effective and continually improved.

The reporting and assessment of the effectiveness of our Modern Slavery Policies, Procedures, and actions as outlined in this Statement are reported and monitored with identified changes implemented to mitigate our risk profile across both our operations and supply chain to make sure that our approach to risk identification and assessment remains effective.

Further information is provided to all personnel of the A.G. Coombs Group of Companies to ensure we are meeting our Core Value of being a Good Corporate Citizen. This includes: Policy P-04 - Code of Conduct, Policy P-07 - Recruitment, Policy P-22 - Engagement and Management of Contractors, and Policy P-46 - Whistleblower.

All A.G. Coombs Group of Companies Policies and Procedures are reviewed and updated on a regular basis, including review and sign-off by the Managing Director and Group Board.

A.G. Coombs Group

Melbourne, Sydney, Brisbane, Canberra

Head Office:

26 Cochranes Road (PO Box 1136)
Moorabbin, VIC 3189

General Enquiry: 03 9248 2700

www.agcoombs.com.au



A.G. Coombs Group

The A.G. Coombs Group is a privately owned Australian group of companies that provides an integrated range of technical services for all systems in buildings, from design through to installation, commissioning, maintenance and ongoing operation and management. Operating for over 70 years, A.G. Coombs has a national capability with major operations on Australia's eastern seaboard.

Melbourne 03 9248 2700 | Sydney 02 8020 6000
Canberra 02 6217 5600 | Brisbane 07 3648 0500 | agcoombs.com.au

A.G. Coombs Projects

A.G. Coombs Projects leverage a National Centre of Excellence approach, where teamwork and project management skills set the company apart. This approach also provides high end engineering, project management and site personnel to deliver successful projects throughout Australia.

03 9248 2700 | agcoombs.com.au/projects/

A.G. Coombs Service

A.G. Coombs Service is a specialist provider of air conditioning, mechanical services, building controls and bundled services maintenance. Delivering 24/7 building support, the company is a preferred supplier to the Facilities Management industry and provides professionally managed, highly qualified technical staff to achieve improved reliability, lower costs and regulatory compliance in commercial, retail and industrial buildings.

03 9676 4600 | agcoombs.com.au/service/

A.G. Coombs Advisory

A.G. Coombs Advisory provides quality advice and consulting services across numerous disciplines including mechanical, electrical, hydraulics and fire protection services and building technologies. A.G. Coombs Advisory is Australia's leading provider of Green Star Independent Commissioning Agent (ICA) services for projects requiring Green Star 'As Built' Certification.

03 9248 2700 | agcoombs.com.au/advisory/



Walker Fire Protection

Walker Fire Protection provides a range of fire protection and detection services, from high end project engineering advice and consultancy through to concept and detailed design, installation of all types of fire detection and suppression systems, and ongoing inspection, testing, maintenance and regulatory compliance support.

03 9279 7100 | agcoombs.com.au/walkerfire/



Integrated Technical Management

Integrated Technical Management is a high quality provider of Technical Facilities Management specialising in technically complex and critical facilities such as data and internet centres, major commercial complexes and sophisticated industrial plants.

03 9248 2700 | agcoombs.com.au/tfm/