

Lloyd Group FY2021

Modern Slavery Statement





Introduction

As a family-owned Australian company delivering community projects, Lloyd Group cares greatly about our staff, the people we work with, our communities and our environment.

Lloyd Group firmly believes in the protection of human rights, including the absolute rights to freedom from slavery and forced labour and to freedom from torture and other cruel, inhuman or degrading treatment or punishment.

We are committed to continuing to develop and strengthen our response to modern slavery over time and during FY2021 we have put into place procedures to ensure our employees can identify and respond to indicators of modern slavery and to ensure Lloyd Group is able to assess and address risk of modern slavery in our direct supply chain in 2022 and beyond.

Lloyd Group's mission is to "Build Australia's Future" and we believe that should be a future where modern slavery no longer exists in our operations or supply chain.

This statement is made on behalf of Lloyd Group Pty Limited (ABN 96 069 674 479) (Lloyd Group) in compliance with the Modern Slavery Act 2018 (Cth) and sets out the steps we have taken during the financial year ending 30 June 2021 (FY2021) to identify and address modern slavery in our operations and supply chain.

Structure & Operations

Lloyd Group was established in 1979 and is a family-owned construction company. It has offices in Melbourne, Geelong, Sydney, Brisbane and Newcastle.

In FY2021, with a team of 139 dedicated staff, Lloyd Group had the financial capacity, expertise and experience to undertake any project up to \$40m in value, across the following sectors:

- Education
- Childcare
- Ecotourism
- Community
- Health
- Emergency Services
- Commercial
- Retail
- Aged Care

At Lloyd Group, we are driven by our core values – respect, integrity, innovation, collaboration, excellence and trust. In accordance with these values, we are determined to carry out business ethically and with integrity and transparency.

We expect the same high standards from our suppliers and subcontractors.



Supply Chain

In FY2021, Lloyd Group procured over \$139 million of goods and services from over 1800 direct suppliers. Our direct supply chain includes the procurement of goods and services for our:



Corporate Supply Chain

including staff uniforms and PPE, cleaning of offices, IT software and hardware, office furniture, professional services



Construction Supply Chain

including subcontractors, consultants, materials and manufactured products who supply goods and services to our sites in Victoria, NSW and Queensland

Being in the construction industry, many of our direct suppliers to our construction sites:

- manufacture products in factories in Australia or overseas;
- source materials and products from overseas or have components manufactured overseas; and
- have a large unskilled labour workforce which may include migrant labour.

We have identified the supply chains of these direct suppliers as our highest risk area for modern slavery in our supply chain.



Structure & Operations

The focus for our statement for FY2021 has been:

- to put in place systems and processes that effectively and efficiently identify modern slavery risk in our supply chain and are scalable as Lloyd Group continues to grow; and
- educate our staff on how to identify and respond to indicators of modern slavery.

During FY2021, Lloyd Group took the steps outlined in Table 1 to assess and address modern slavery risk in its supply chain:

| Action | Status | FY2021 |
|---------------|--------|--|
| Documentation | ✓ | Publish a Whistleblower Policy |
| | ✓ | Publish a Modern Slavery Policy |
| | ✓ | Ensure all new Subcontracts have a modern slavery clause |
| | ✓ | Update project delivery procedure to provide that all suppliers must have completed a modern slavery questionnaire on our induction software before commencing on Site |
| Due Diligence | ✓ | Investigate any issues identified in FY2020 questionnaire |
| | ✓ | Set up a modern slavery questionnaire on our induction software which is to be automatically completed by all suppliers at engagement from 2022 onwards |
| | ✓ | Issue modern slavery questionnaire to new high value suppliers in 2021 via our induction software |
| Training | ✓ | Train employees on Whistleblower Policy |
| | ✓ | Train employees on how to identify, assess and respond to modern slavery risks |

Table 1 – Lloyd Group Assess and Address Plan

Our modern slavery questionnaire was sent to 109 high value suppliers new to Lloyd Group in 2021 (a questionnaire was sent to high value, high risk suppliers in 2020). [x]% of those suppliers responded to the survey.

The survey results revealed:

- none of the respondents were aware of modern slavery in their supply chain;
- none of the respondents use materials sourced or originating from countries identified as being high risk for modern slavery; and
- none of the respondents recruit labour from overseas.

Where potential issues are identified, we will work with and continuously engage with the supplier to learn more about the issue and to put in place actions to help them address or mitigate the modern slavery risk.

Assessing Effectiveness

Lloyd Group's 2020 modern slavery statement was our first modern slavery statement and was limited to an assessment of our high value, high risk suppliers. In 2021, we have focussed on improving the processes we put in place in 2020 to assess and address modern slavery and are satisfied that from 1 January 2022 onwards we will be better positioned to assess all suppliers in our supply chain.

From 1 July 2021, we intend to assess the effectiveness of the actions taken by Lloyd Group to assess and address modern slavery risk in its operations and supply chain by:

- Conducting an annual review of the processes we have put in place to assess and address modern slavery and look at ways to improve them.
- Where modern slavery risks have been identified in the previous financial year, working with suppliers to check how they are progressing any actions put in place to address those modern slavery risks.
- Conducting internal audits of internal processes put in place to assess and address modern slavery risk, for example ensuring all employees have read Lloyd Group's Modern Slavery Policy and been trained on how to identify, assess and respond to modern slavery risk.

Consultation Process with Entities Owned or Controlled by Lloyd Group

Lloyd Group Pty Limited does not own and control any other entities. This statement is given under section 13 of the Modern Slavery Act 2018 (Cth).





Approval

This statement for financial year ending 30 June 2021 is made pursuant to section 13 of the Modern Slavery Act 2018 (Cth) and constitutes Lloyd Group Pty Limited's modern slavery statement.

The statement has been approved by the Board of Directors of Lloyd Group Pty Limited.

A handwritten signature in black ink, appearing to read 'D. Lloyd'.

Dustin Lloyd
Director

A handwritten signature in black ink, appearing to read 'C. Lloyd'.

Clinton Lloyd
Director