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# Modern Slavery Statement

2024





Approximately 40 million people live in modern slavery globally. Australia is not immune to modern slavery, with an estimated 1900 cases to date.

All businesses have a role to play in combating modern slavery and **we take this responsibility seriously and endeavour to ensure our businesses, our people and our processes are aligned to this goal.**





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# 01.

## About us

This Modern Slavery Statement is made by Doneilyn Pty Ltd ABN 69 007 544 836 for the reporting period ended 30 June 2024 (FY24) pursuant to the Modern Slavery Act 2018 (Cth) ("Modern Slavery Act"). Doneilyn is a privately held company and the parent entity of Sarah Constructions Pty Ltd, Sarah Build Pty Ltd, Sarah Defence Pty Ltd and Hindmarsh Plumbing Services Pty Ltd, providing commercial construction and commercial plumbing services across Australian States and Territories.

This statement is submitted on behalf of all the above entities and when we refer to "Sarah", "we", "us" or "our" in this statement, it is a reference to all the above entities.

Our registered office and principal place of business is:  
49 Glen Osmond Rd  
Eastwood, SA 5063



## Our Operations

During FY24 Sarah employed 400 personnel across head office and project sites delivering work for private and government clients, across multiple sectors and predominantly in South Australia.



## Our Structure

Sarah is a privately owned, Australian based and owned company delivering design and construction services, as well as commercial plumbing services as follows:



**Design**



**Construction  
Project Delivery**



**Plumbing  
Service Delivery  
and Maintenance**



**Plumbing  
Hydraulic and  
Mechanical  
Services**



**Water Treatment**



**Corporate Services  
(including  
Finance, HR, IT,  
Insurance  
and Property)**



## Our Values

### Our purpose is to enable business excellence

We will achieve this by deeply immersing ourselves into operations, providing technical expertise and exceptional customer service, and always having an improvement focused mindset.

### Our vision is to build great communities

We will achieve this by continually investing in our businesses and property portfolio, providing our staff with long term careers, and ensuring a sustainable future for family generations to come.



We demonstrate empathy, fairness and humility. We care about our people and our community.



We hold ourselves to the highest standards. We do what is right, not what is easy.



We create value through a one-team approach. We believe the best outcomes are achieved through many minds coming together.



We strive to always deliver on our promise, and continuously improve the way we do things.



## Our Projects

Key projects undertaken during the FY24 include:



### Morialta Secondary School

Morialta Secondary College, a new co-educational government school in Adelaide's north-eastern suburbs, features open design and state-of-the-art technology. It supports modern pedagogy principles with communal, flexible, and indoor-outdoor learning spaces, inspired by Morialta Conservation Park landmarks and the area's First Nations history.



### Banksia Apartments

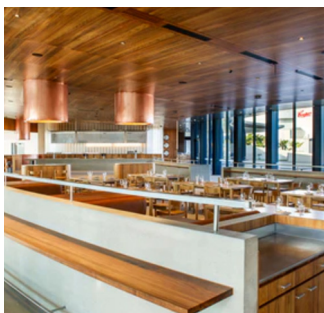
Banksia features 72 one-, two- or three-bedroom customised apartments over eight storeys, each with its own balcony or terrace to enjoy views of the city or the Adelaide Hills. The development also includes a CFA piled basement car-parking and landscaping designed to blend seamlessly into the leafy surrounds.



### Munno Para Shopping Centre

The Munno Para Shopping Centre is a large retail centre located in Adelaide's north.

As part of its overall redevelopment Masterplan, the upgrade works for the Southern Entrance developed a high-quality food and dining precinct.



### Coopers Brand Home

The famous Coopers Brewery undertook a historic development incorporating a World Class visitor centre and new distillery amongst other exciting aspects. Hindmarsh Plumbing were proud to be involved with another famous South Australian family business.



### Eastwood Private Hospital

Work continues on a 6 level Private Hospital on Greenhill Road in Eastwood. Hindmarsh Plumbing has used the project to demonstrate the exciting innovation on offer in the industry by using the Hilti Jaibot to drill concrete holes for not only us, but other service trades.



### 150 Grenfell Street

A unique project where an office building comprising of 2 separate structures was combined into one and completely refurbished with a large focus on energy efficiency. The finished product looks stunning and has been highly sought after by commercial tenants.



# Our Supply Chain

In FY24 Sarah’s procurement spend was approximately \$423 million.

We extended on the prior year assessment of our supply chain during the current year, with the main categories of spend remaining largely the same and summarised below.

## Commercial Construction

Subcontracts and Labour	Materials	Materials and Labour	Equipment
Hydraulic and Plumbing Services	Steel	Doors and Frames	Rubbish Bins
Mechanical Services	Aluminium	Formwork	Site Sheds
Electrical Services	Concrete	Cladding and Roofing	Equipment Hire
Civil infrastructure	Reinforcement Supply	Ceilings and Partitions	Vehicle Fleet
Reinforcement Fix	Furniture	Carpet and Flooring	
Fire Protection Services		Joinery	
Landscaping Services		Concrete - supply and place	
		Painting	
		Fencing	

## Commercial Plumbing

Subcontracts and Labour	Materials
Demolition	Plumbing Supplies
Fire Protection Services	Water Treatment Supplies
Civil Infrastructure	
Water Treatment Specialists	Equipment
Apprentice Providers	Vehicle Fleet
	Excavation Equipment

## Corporate Services

IT Software	Advisory Services including
IT Equipment	Professional Services
Telecommunications	Training
Insurance Broker and	Office Supplies
Insurance Services	Office Cleaning

Our highest spend categories were subcontractors, labour, and materials. We only contract directly with local Australian companies and do not contract directly with overseas suppliers, unless there is a specific item which the customer requests only available from overseas. Although all our direct suppliers are domiciled in Australia, they often supply goods or services sourced from other regions. Our

subcontractors mostly supply the construction materials used on our projects, which limits our visibility of the risks associated with these parts of the supply chain. Within our commercial plumbing operations 90% of our supplies are sourced from Reece and Tradelink. During the current reporting period, Sarah has to the best of our knowledge not directly contracted with an overseas entity.

## Supply Chain and Labour Constraints

*As many in our industry, we have not been immune to supply chain constraints, supply cost escalation and access to labour. To manage this risk, we have focused on building strategic relationships with top subcontractors and suppliers, bolstered our employee offering to retain talent, reviewed of our new business function to ensure appropriate contingency is factored into pricing of work being tendered. As a result, we have managed to reduce loss making jobs, whilst retain solid relationships with our suppliers and subcontractors.*

# 02.

## The risks of modern slavery in our operations and supply chain

The risk of modern slavery practices within our business was assessed on their potential to cause, contribute to or be directly linked to modern slavery through our operations and supply chains.

### In Our Operations

In FY21, Sarah completed an initial review and gap analysis of the risk of modern slavery in our operations. This review was undertaken by leadership within our Operations, Finance, Procurement and Risk teams. This analysis has been reviewed and updated each financial year. There has not been significant changes in activity and our current risk of modern slavery within our operations remains LOW for the following reasons:

- ✓ We have an Audit, Risk and IT committee which is chaired by an independent member. This committee is charged with Internal Audit, which includes management of the company risk register and delivery of an annual internal audit plan.
- ✓ We have a dedicated Human Resources team within each of our group entities. These teams have robust controls in place for onboarding new employees including but not limited to working right employment checks and preparing and reviewing employees' wages and salary agreements.
- ✓ The employee induction process includes the requirement for employees to confirm they have read and understood all our policies and minimum standards. All existing employees are required to re-confirm these every two years.
- ✓ We have ongoing training and engagement with our employees to ensure an understanding of modern slavery risks and responsibilities.
- ✓ All our employees are located in Australia.
- ✓ All apprentices are sourced through Australian Registered Industry Group Training Organisations, with 96% of apprentices sourced from either Master Plumbers Association South Australia (MPA) and Trainee & Apprentice Placement Services Inc (TAPS).
- ✓ Approximately 27% of our employees are covered by an enterprise agreement.
- ✓ We have implemented a subcontractor management database in our commercial construction entities (covering 90% of our procurement spend) which facilitate initial engagement with subcontractors, including a preliminary questionnaire relating to their modern slavery practices.
- ✓ We have included Modern Slavery as an agenda item on our ESG Committee meetings, to promote sharing of ideas and drive continuous improvement.
- ✓ In 2022, we engaged PwC to assess the maturity of our current approach to modern slavery against legislative requirements and best practice guidance. PwC noted that our maturity was at a 'managed' level, recognising our policies and procedures, understanding of suppliers and engagements with employees and suppliers. PwC made a number of recommendations to further enhance our maturity which have been included in our three-year plan, below.





In Our Supply Chain

We understand by nature of the commercial construction and plumbing industry we operate in there are inherent factors which contribute to the risk of modern slavery. These factors are summarised below:

- Prevalence of outsourcing, which can impact upon operational and supply chain transparency.
- Contract terms with low margins and pressure on delivery times.
- Sub-contractors who may be reliant on a migrant workforce with limited local language competency and temporary visa arrangements.
- Multiple sub-contracting arrangements with informal agreements.
- Low barriers of entry for labour hire providers.
- Potential dangerous or poor working conditions, including:
  - > Workers are not paid fairly or withheld entitlements.
  - > Workers may be required to work excessive hours.
  - > Workplace safety concerns.
- Tight project deadlines and price pressures

Many of the suppliers and subcontractors we contract with, may source elements via overseas supply chains. We continue to build strong relationships with our supplier and subcontractor network to gain more insight and understanding of their supply chains, however it is difficult to have visibility across the multiple level and numerous components of modern slavery within our supply chain. This has been taken into consideration when performing our risk assessment and gap analysis.

The following key areas of modern slavery risk within our operations and supply chain have been identified:

	Project Supply Chains	Finance, HR, IT and Legal
 High Risk	Ceilings and Linings Cladding and Roofing Joinery Painting Tiling Concrete Labour Hire Aluminium	
 Medium Risk	Steel Reinforcement Fix Hydraulic Services Mechanical Services Electrical Services	IT and Telecommunication Equipment Cleaning Services Office Supplies

# 03.

## Actions taken to assess and address the risks, including due diligence and remediation processes

Sarah assessed the risk of modern slavery within our operations and supply chain by considering factors inherent to the construction industry as outlined in section 2 of this report as well as the following:

- Available evidence supporting the ability of our suppliers and subcontractors to manage the risk of modern slavery within their own supply chain
- The extent of elements supplied by our suppliers and subcontractors which are sourced from high-risk overseas regions
- The level of internal controls within Sarah which assist in reducing and managing the risk of modern slavery within our supply chain
- The relationships we have with our suppliers and subcontractors

### Actions Already Taken

Following the initial risk assessment and gap analysis performed during FY21 and the subsequent reviews, the following actions have been undertaken:

- ✓ Embedding our updated procurement templates within our businesses processes.
- ✓ All purchase orders and subcontracts include terms with reference to Modern Slavery obligations and expectations.
- ✓ Implemented a subcontractor management database, which has purpose built modern slavery questionnaires and templates to further enhance our procurement processes and procedures.
- ✓ Engaged external consultants to review our processes and procedures in managing modern slavery risk, with the view of understanding gaps and opportunities for improvement.
- ✓ Refreshed internal policies to provide enhanced clarity on employee responsibility, as well as improved awareness of the process employees need to follow if there is an incident or suspected incident of modern slavery.
- ✓ Delivered Modern Slavery awareness training to our leaders through in person sessions and online training modules.
- ✓ 90% of Executives have completed in person modern slavery awareness training. In addition, senior leaders have completed a modern slavery online training module.
- ✓ Developed modern slavery posters to be displayed at all sites, including information about modern slavery and QR codes to access additional information and assistance in multiple languages. These posters are considered a standard part of site establishment and are checked at site establishment audits.
- ✓ Continued building strong relationships with our suppliers and subcontractors to gain better insight into the risks of modern slavery within their supply chain and to work as a driver for awareness and change within the industry.
- ✓ Reviewed Reece and Tradelink's Modern Slavery Statements to understand their approach to Modern Slavery. 90% of supplies in our commercial plumbing business are sourced from these two suppliers. Both suppliers have taken action to manage modern slavery in their supply chain including risk assessing suppliers, supplier onboarding processes and supplier audits.
- ✓ Continued to engage in regular consultation through the ESG Committee and Audit, Risk and IT Committee.



### Actions to be Taken:

In line with our three year plan developed last financial year, the following actions will be the focus of the next financial year:

Activity	
<input type="checkbox"/>	Continue to evolve our onboarding requirements and modern slavery questionnaires across the businesses
<input type="checkbox"/>	Engage with apprenticeship providers to ensure their approach to respecting human rights and guarding against modern slavery is sufficiently robust
<input type="checkbox"/>	Engage with employee through ongoing communication and formal training to raise awareness of modern slavery risks
<input type="checkbox"/>	Undertake policy refresh as required
<input type="checkbox"/>	Engage in regular consultation through the ESG Committee and Risk and Transformation Committee (Previously Audit Risk and IT Committee)

# 04.

## How we assess the effectiveness of our actions

We continue to develop the way in which we assess the effectiveness of our actions in response to risks which cause, contribute, or are directly linked to modern slavery. Many of the actions which we have taken to date or are planning to take over the next 12 months are part of the development of our framework for the management of modern slavery risks.

As this framework matures and develops and as we gain a better understanding of our exposure to modern slavery risk, we will continue to improve and enhance our response accordingly.

### Our assessment of actions undertaken will include:



Qualify subcontractors through our subcontractor management database



Include modern slavery questions as part of our standard subcontractor onboarding process



Review Whistle blower reports for any trends relevant to modern slavery



Evaluation of the effectiveness of training programs run across the business

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# 05.

## How this statement was prepared

This statement has been prepared in consultation with key stakeholders and executive management across all our entities.

This statement for the financial year ending 30 June 2024 is made pursuant to section 14 of the Modern Slavery Act 2018(Cth) and has been approved by the Directors of Doneilyn Pty Ltd.



Timothy Sarah  
Joint Managing Director



James Sarah  
Joint Managing Director







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## Modern Slavery Statement

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