

# FDC Group

## Modern Slavery Statement 2023

This Statement has been prepared in consultation with, and on behalf of all eligible FDC reporting entities under the Commonwealth Modern Slavery Act 2018.

It also serves as a voluntary statement, prepared, and submitted in consultation with other FDC entities, that do not currently qualify as reporting entities under this legislation.

We do this as a complying entity, a demonstration of best practice, and consistent with the values we hold as a responsible, privately owned organisation.

Submitted by FDC Group Holdings Pty Ltd (ABN 68 615 183 358) on behalf of all related FDC operating entities.

## About FDC

Established in 1990, with a team of 12 employees, FDC now employs more than 600 Australian based staff, has no external shareholders, and has a balance sheet, safety record and reputation that is the envy of the Australian construction industry. All shareholders of FDC are actively involved in the ongoing management and decision-making processes of FDC.

Over 33 years, our operations have grown from the original technical and mechanical services businesses, to include a variety of highly sophisticated and complex design, construction, fitout, and refurbishment undertakings.

As head contractor we rely on our own in-house expertise, as well as the technical and delivery expertise of our project partners. Diligent appraisal and selection of these delivery partners is core to our success, and key to the longevity and enduring nature of our relationships.

Consistent with our company mantra, *"It's not just what we deliver, but how we deliver that matters to us"*, integrity and the value we place on our reputation as a trusted delivery partner, permeates throughout everything we do.

Our Corporate Values (below) are key to establishing the framework, and maintaining the culture of mutual respect, social responsibility, and community involvement that FDC enjoys today, and is very proud of.

### **We're Personal**

We are only as good as our client, subbie and team relationships, the tenure of our staff and the wellbeing of our families and community.

### **We're Defined by the Client Experience**

We measure our success by our clients metrics not our own. When they see excellence, so do we.

### **We're Humble, but Hungry**

Despite our success, we don't focus on how far we have come, but how well we can do today.

### **We Are All In**

Our shareholders are our employees. We share a collective reputation. We have no external investment, driven by the collective desire for our team to succeed.

### **We're Young at Heart**

In personality, not experience. Our sense of youth speaks to our feeling of empowerment, endless possibilities and not taking ourselves too seriously.

## Our Structure, Operations and Supply Chain

### Structure

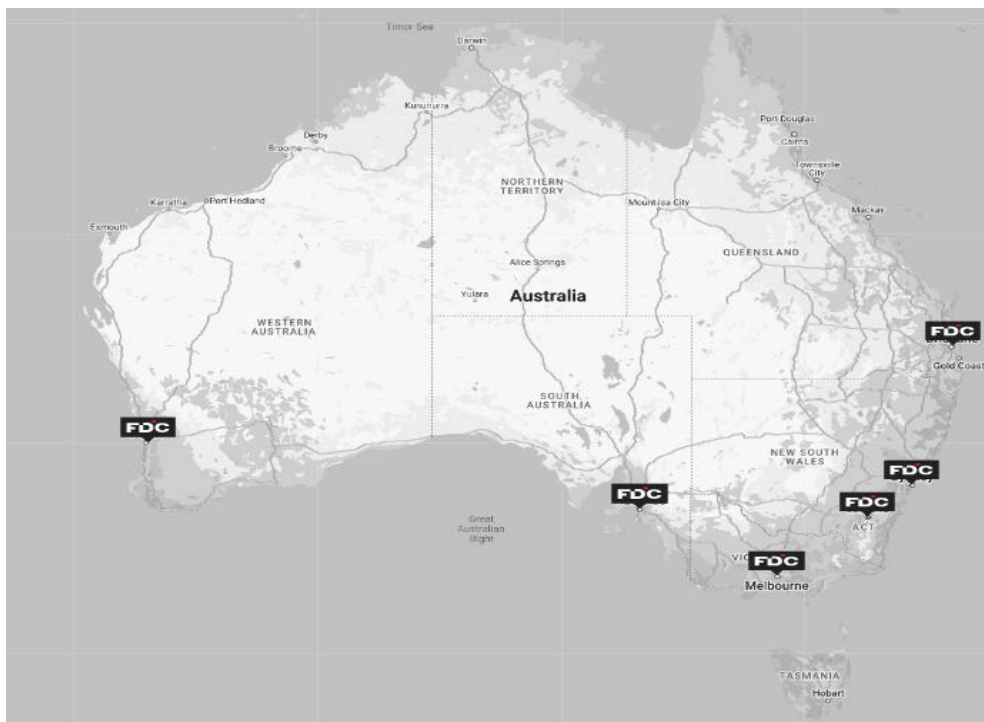
FDC Group Holdings Pty Ltd (FDC) is the parent company of all operating companies and divisions within the FDC Group. FDC is 100% owned by its Directors and employees, all of whom are actively involved in the day to day management and operations of the business.

### Operations

FDC MSA 2018 - Eligible Reporting Entities	FDC MSA 2018 - Voluntary Reporting Entities
<p>FDC Group Holdings Pty Ltd                      FDC Construction (NSW) Pty Ltd                      FDC Fitout &amp; Refurbishment (NSW) Pty Ltd                      FDC Construction &amp; Fitout (VIC) Pty Ltd                      FDC Construction &amp; Fitout (QLD) Pty Ltd</p>	<p>FDC Construction &amp; Fitout (ACT) Pty Ltd                      FDC Construction &amp; Fitout (SA) Pty Ltd                      FDC Construction &amp; Fitout (WA) Pty Ltd                      FDC Mechanical Services Pty Ltd                      FDC Business Services Pty Ltd</p>

FDC is 100% focussed on the Australian building and construction industry. FDC has no operations outside of Australia. As a leading head contractor in this industry, our focus is on the design and construction of new buildings, the refurbishment and fitout of existing buildings and the provision of mechanical and associated services to our clients. Our focus is primarily on the commercial, industrial, and non-residential sectors of this market.

FDC operate in all States and Territories of Australia, except for Tasmania and the Northern Territory. Our operations are primarily metropolitan based, and do work regionally as market and client circumstances permit.



Our annual revenues exceed \$1bn and continue to grow across each of our operating divisions. We are not driven by top line headlines. We focus on risk management, delivering high quality product in a sustainable, responsible, and uncompromising manner for high quality clients and partners.

FDC operating divisions and entities, operate within the requirements and framework of our Integrated Management System. During FY 23, the FDC integrated management system has been recertified to International and Australian Safety (ISO 45001:2018), Quality (ISO 9001:2015) and Environmental Standards (ISO 14001:2015). FDC is also accredited by the Office of the Federal Safety Commission (OFSC).

FDC management systems and processes ensure that we comply with all applicable safety and labour legislation, rules and regulations, standards, codes of practice, client and community expectations including, but not limited to the Fair Work Act 2009, Work Health and Safety Act 2011, Migration Act 1958, the Commonwealth Modern Slavery Act 2018 and respect@work legislation.

## Supply Chain

FDC engaged the services of more than 4,000 suppliers and service providers during FY 22/23. Our supply chain remains top heavy, with 42% of our total spend coming from our top 100 suppliers, a slightly more diverse result than the pcp of 48%. The nature of our supply chain remains reasonably consistent, with approximately 80% of our spend coming from the top 20% of our suppliers.

All new vendors to our business continue to be provided with the FDC Modern Slavery Charter for Suppliers and Service Providers upon engagement, and are required to agree to and accept the provisions contained within it.

FDC have been working with our suppliers over several years, to ensure that they are aware of any human rights and modern slavery risk elements that need to be considered in the trade packages and services they provide to FDC.

As a matter of course, FDC do not generally purchase goods, services, or materials directly from offshore, or on our own behalf. If, and when we do enter into offshore purchasing arrangements, it is done in accordance with our own due diligence requirements and the specifications provided to us by our clients.

## Actions

### Supplier Assessments - Ongoing Actions

FDC utilise a combination of third-party resources as well as our own in-house tools, to assist us in assessing the modern slavery risks that may exist within the supply chains of our suppliers and our own supply chains.

FDC have begun implementing a more rigorous approach to the assessment of our suppliers, taking into consideration the responsible, sustainable, and human elements of their own purchasing arrangements.

These tenderer and supplier assessments are designed to not only raise awareness of the issues of modern slavery and human rights risks that may exist in the first, second and deeper tiers of their own supply chains, but also give us the ability to undertake further assessments on certain high risk elements of our supply chains.

These assessments have been more in the form of targeted and collaborative approaches to a number of key suppliers in higher risk categories such as solar installations, imported timbers, cleaning and labour hire suppliers. The learnings from these collaborations will contribute to forming the basis for future decisions and supplier assessments.

The increasing global demand for alternate forms of energy will continue to place significant pressure on the supply chains of all industries related to the electrification of our communities. The responsible provenance of products and materials remains a major issue for all industries, including the construction and infrastructure industries. This is something that FDC will continue to contribute towards improving, wherever possible.

FDC continue to develop our processes and are committed to exploring alternate and more effective means of working with our suppliers in assessing the mutual risks that may exist in our supply chains.

Top 100 Suppliers by Value	
Risk of Modern Slavery	Services/Suppliers by Category
High Likelihood	Electrical Services, HVAC, Joinery, Fire Services, Structural Steel, Roofing Systems, Flooring and Carpeting, Office Furniture/Portable Office Equipment, Waste Equipment, Plumbing, Tiling, Metal Fabrication, Partitioning/Plastering, Painting, Hydraulic Services, Labour Hire, Solar Installations, PPE/Uniform Supply.
Medium Likelihood	Concreting Services, Power Generation, Swimming Pools, Facades, Civil/Earthworks, Demolition, Lifts/Elevators, Mezzanine Systems.
Low Likelihood	Insurance Services, Architectural Services,

## Procurement

FDC project teams and divisions retain a reasonable level of autonomy over their procurement practices and decisions. These procurement decisions are, however, subject to the responsible procurement guidance and intent contained within our ESG Strategic Framework and other policies. This framework continues to be developed.

Given this de-centralised procurement model, it is imperative that regular internal communications are maintained with our project teams. These are managed via various means including participation at regular project team meetings, senior management meetings and internal electronic communications.

## Collaboration – Internal and External

FDC continue to collaborate with, and draw on the resources of industry groups and providers such as the PCA/Informed 365 Property Platform Modern Slavery Working Group, Fair Supply, SEDEX, Australian Catholic Anti-Slavery Network (ACAN), EcoVadis, Norton Rose Fulbright, Walk Free, and others, to inform our decisions and improve our outcomes.

Modern Slavery and Forced Labour is one of the 5 key pillars that form the FDC ESG Strategic Framework 2023 -2025. Progress on the development of this framework is monitored monthly at FDC group senior management level and reported upon at Director and Divisional Leadership level every 3-6 months. FDC Directors and the Senior Leadership Team are committed to the success and ongoing resourcing and implementation of this framework at FDC.

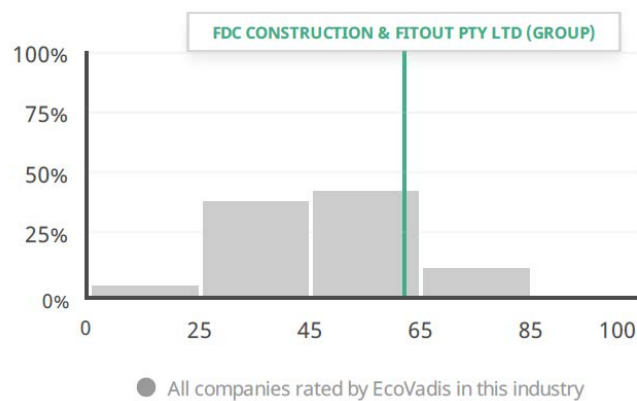
Strategic Focus	Emission Reduction	Diverse, Responsible, Sustainable Procurement, and Practice	Modern Slavery and Forced Labour	Indigenous Participation and Heritage	Gender Diversity and Equality
Objectives	Contribute to Improved Environmental and Climate Outcomes	Contribute to Improved Social, Economic, and Sustainability Outcomes	Reduce the Potential for Human Harm in our Supply Chains	Increase Opportunities Available for Indigenous Participation in Our Industry and Community. Improve Outcomes for First Nations People. Contribute to a more Reconciled Australia.	Create a Culture of Confidence and Support. Ensure Career Path Clarity and No Gender Adversity. Drive Personal and Business Performance.
Desired Outcomes	Baseline Carbon Assessment Public Disclosure Statement Recommendations - Reduction and Offset Strategy - Reduction Targets - Implementation Plan - Ongoing Reduction Plan 3 <sup>rd</sup> Party Verification /Certification	Increased Staff Skills/Accreditation (GBCA, NABERS, ESD, other) Design and Efficiency Improvements Client Satisfaction Industry Recognition (Awards) Social Impact Statement FDC Sustainability Management Plan FDC ESG Procurement Guidance	Improved Supplier Awareness and Response MS Statement – Compliant and Improved Increased Project Team Awareness Remedial Tools and Actions Identified FDC ESG Procurement Guidance	Increased Engagement "Innovate" RAP Milestones and Deliverables achieved. Employment Opportunities Community Engagement FDC ESG Procurement Guidance	Policy Improvements - Parental and Special Leave - Return to Work /Flexibility - Carer Leave and Support - Recruitment - Like/Like Remuneration - Anti-Harassment - Support/Advocacy  Improved FDC Female - Participation - Retention - Development/Progression  Workplace Gender Equality Agency - Re-Certification - Pay Gap -Reporting Improvement - EOCOE Citation
Responsibility	ESG Manager, Carbon Working Group, All.	ESG Manager and Divisional Champions, Design and Project Teams, All.	ESG Manager and Divisional Champions, Project Teams, All.	ESG Manager, RAP Champions, All	ESG Manager, Women's Working Group, All.

## Effectiveness

### Third Party Assessment

FDC undertake an annual audit and assessment of our CSR/ESG practices by the International ratings agency, EcoVadis. These assessments include an appraisal of our policies, processes, actions, and reporting, related to a number of environmental, sustainable, and social issues including Modern Slavery, and Labour and Human Rights. On the category of Labour and Human Rights, EcoVadis have assessed FDC as being in the “Advanced” category of companies they assess.

FDC consistently rank in the top 10% - 20% of construction industry companies rated (internationally) by EcoVadis on both our overall ESG score, as well as on our reported Labour and Human Rights actions. We value these assessments and the learnings we gain from them, and strive to continue to improve the effectiveness of our actions.



### Risk Management

FDC continue to pursue a deliberate strategy of increasing the number of our projects that involve early engagement with our clients at the design, planning and procurement stages. This increased visibility assists FDC delivery teams in managing and reducing the various risks involved in these projects, including responsible and sustainable procurement.

## Other Relevant Information

### Grievance and Remedy

The FDC Whistle-blower Policy and its associated procedures remains the principal means of governing, recording, and remediating any instances of modern slavery that may become apparent in our operations, or supply chains.

FDC also rely on various forms of site signage to act as both awareness documents and grievance mechanisms, amongst our site and office-based staff, suppliers, and contractors. We have implemented a variety of awareness, reporting and grievance mechanisms across our sites nationally. In some instances, these may be our own resources, in others we may utilise client produced material if available and required.

### Policies and Relevant Documents

The key policies and documents relating to FDC’s modern slavery, fair and forced labour initiatives are listed below.

The FDC Modern Slavery Policy and Charter, Code of Conduct and Ethics (Code) and Whistle-blower Policy, remain the principal documents that guide and govern our modern slavery and other social initiatives.

FDC continually review these policies, codes, and documents to ensure they continue to meet ours and our client’s expectations, and all regulatory requirements.

Modern Slavery Policy	Environmental Sustainability Policy
Human Rights Policy	Work Health and Safety Policy
Code of Conduct and Ethics	Whistle-blower Policy
Modern Slavery Charter for Suppliers and Service Providers	FDC ESG Strategic Framework 2023-2025
FDC Tenderer Assessment – HSEQ, ESG, I.R	

This Statement was approved on 14<sup>th</sup> December 2023 by the undersigned, and has the full support of the FDC Board of Directors and Senior Leadership Team.



**Russell Grady**  
**Managing Director**



**Peter McCabe**  
**Finance Director**