



MODERN SLAVERY STATEMENT 2022

INTERMAIN GROUP

December 2022

INTERMAIN

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We acknowledge the Traditional Owners of country throughout Australia and recognise their continuing connection to land, waters and culture.

We pay our respects to their elders past, present and emerging.

Intermain is committed to building, valuing and promoting diversity and inclusiveness.



A STATEMENT FROM THE CEO/MD

As part of our ongoing commitment to adhering to the highest ethical and social standards, we continue our mission to become Australia's most socially responsible builder; thus, are proud to release our 2022 Modern Slavery Statement.

Our previous statement has embedded our commitment to combat modern slavery risks across every level of our organization and ensure that modern slavery is not taking place in Intermain's workforce. We implemented a risk-based approach through engaging and supporting our direct suppliers to educate, assess and encourage improvement in their capacity to manage modern slavery risks within their supply chains.

As we move forward, we will continue to collaborate with our internal and external stakeholders to address our modern slavery risks and improve our processes to identify, assess and manage risk in our supply chain.

Intermain rejects any activities that may cause or contribute to modern slavery, including forced or bonded labour, child labour, human trafficking, slavery, servitude, forced marriage, or deceptive recruiting for labour or services.

We're pleased to publish our Modern Slavery Statement, which outlines our approach to address and minimise the risk of modern slavery in our business operations and supply chains.

Andrew Johnson

Chief Executive Officer & Managing Director

The Board of Andrew Johnson Holdings Pty Ltd has approved this statement on 21 December 22

01. ABOUT INTERMAIN

Established in 2001, Intermain including each of its entities, referred to above, and associated entities, is one of Australia's leading multi-skilled commercial fit-out companies. Intermain delivers thoughtfully considered, beautifully designed, functional spaces for a wide range of clients; from corporate offices to heritage, government and educational environments. As part of our national practice, we are firmly committed to conducting business with the highest integrity and in compliance with the letter and spirit of the law.

In 2018, the Australian Government passed the Modern Slavery Act No. 153, 2018 ('the Act'), that requires large corporations in Australia with turnover in excess of \$100 million, to annually report on the risks of modern slavery in their operations and supply chains, and actions taken to address those risks.

For the purposes of the Act, Intermain's 1st modern slavery statement was submitted on 31 March 2021 for a Single Reporting entity, Andrew Johnson Holdings Pty Ltd, ABN 54 089 200 448 and in accordance with Section 13 of the Act. This is Intermain's 2nd modern slavery statement for the period ending 30 June 2022. We were not aware of our reporting obligations under the Act, that required our 2nd modern slavery for the period ending 30 June 2021, to be submitted by 31 December 2021. This statement therefore covers a 2 - year period and ensures that Intermain has an annual statement to cover the relevant reporting periods and is used to demonstrate our processes, frameworks and policies in relation to managing modern slavery risks and our efforts to meet our obligations under the Act.

Intermain intends achieving a zero-tolerance approach to Modern Slavery and we are committed to consistently reviewing and strengthening our processes and systems to minimise the risk of human rights infringements anywhere in our supply chain. We elaborate on this further in this statement, when reporting on actions taken by Intermain to assess and address modern slavery risks.

The Intermain Group includes:

Intermain Pty Ltd	ABN 62 096 189 623
Intermain WA Pty Ltd	ABN 91 165 551 646
Intermain Queensland Pty Ltd	ABN 47 158 180 459
Intermain Victoria Pty Ltd	ABN 73 158 142 495
Intermain ACT Pty Ltd	ABN 43 632 187 592
Intermain SA Pty Ltd	ABN 73 648 554 161
Intermain Joinery Pty Ltd	ABN 25 601 801 021
Andrew Johnson Holdings Pty Ltd	ABN 54 089 200 448 (hereinafter referred to as 'Intermain').

The **Modern Slavery Act 2018** defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. The worst forms of child labour means situations where children are subjected to slavery or similar practices, or engaged in hazardous work.*

Intermain acknowledges that Modern slavery happens at the most extreme end of the working spectrum. It involves the gravest abuses of human rights and serious crimes, having severe and often lifelong consequences for its victims. The term modern slavery is used to describe situations where coercion, threats or deception.



*Refer to www.legislation.gov.au/Details/C2018A00153

02. COMPANY STRUCTURE OPERATIONS AND SUPPLY CHAINS

Intermain has four offices in Australia and our headquarters are in Sydney. Intermain employs approximately 140 full time staff. In addition, Intermain has a large pool of trusted, highly skilled Subcontractors. For each project, we assemble just the right team for the job – engaging designers, builders, specialist trades and project managers as required. We take pride in how we treat our people, and believe that these respectful relationships result in a team that is committed, reliable and a pleasure to have onsite.



Our employees’ safety and wellbeing are of pivotal importance, and we do whatever we can to keep our people healthy and happy. We aim to hire and retain the very best people, provide them with a balance of stimulation and security, and create a working environment that is inclusive and supportive. We also place great emphasis on education and training – keeping staff up-to-date with work health and safety regulations and environmental awareness programs, and keeping an eye on our ongoing compliance by conducting regular site inspections.



SAFETY

Our accountability includes, protecting the safety of our people onsite, which is non-negotiable, and Intermain is proud to have an excellent record in this area.



COMPLIANCE

Our company is listed on the International Compliance Information Exchange, which makes compliance checks quick and easy – and we have a dedicated Building Management System and HSEQ team (‘HSEQ team’), who reviews site risk assessments and random site audits to achieve our objective of zero-harm.



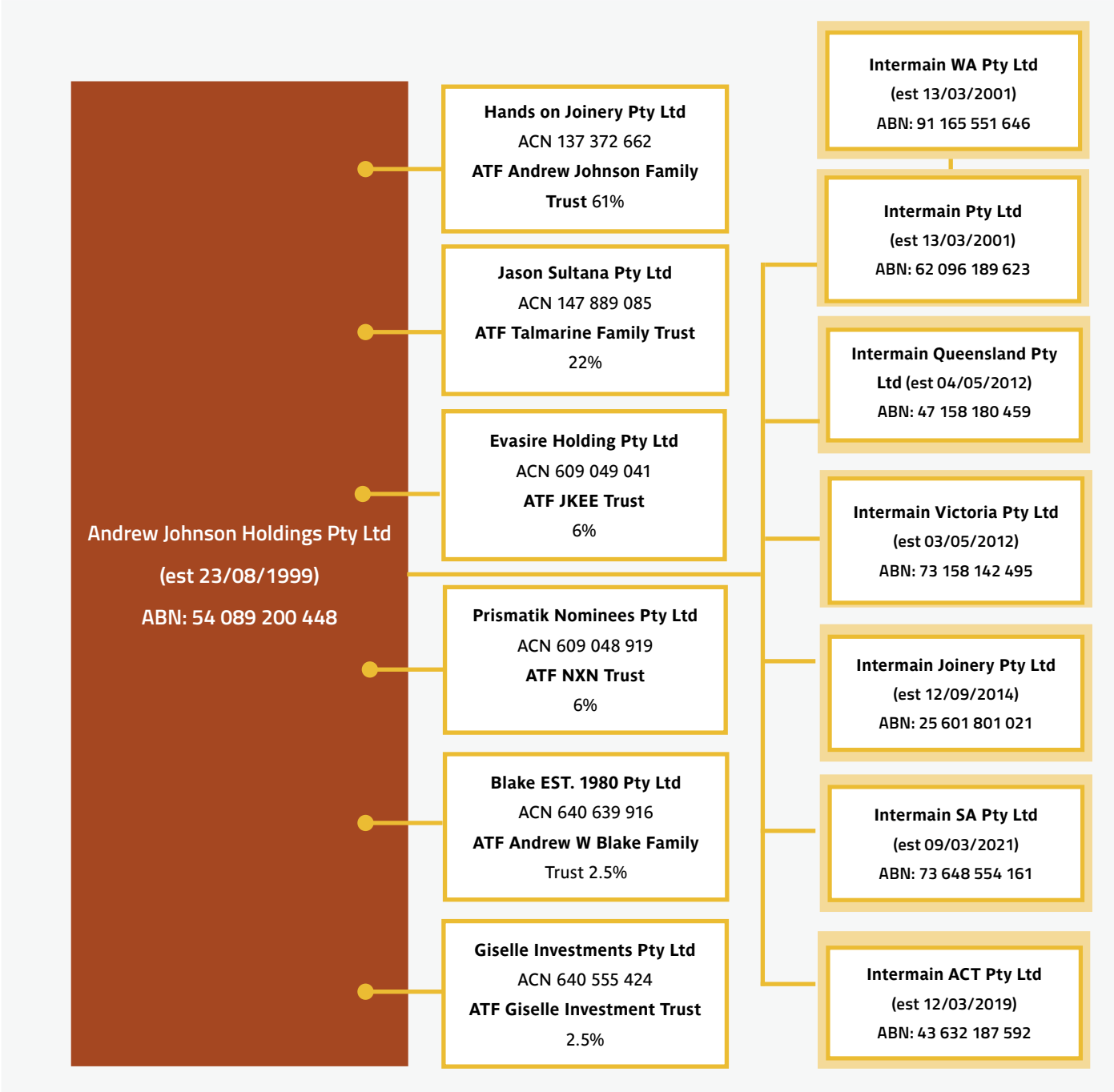
WHS PROCESSES

In addition, Intermain have WHS processes that require completion of Risk Assessments, hazard management and emergency management. All subcontractors supply are required to supply Safe Work Method statement for High Risk Works before starting onsite.

Intermain has extended our accountability to ensure our business and our people are aware of the risks of modern slavery in our operations and supply chains, and actions taken by Intermain to address these risks. We aim to be equally proud in ensuring our compliance with modern slavery requirements.

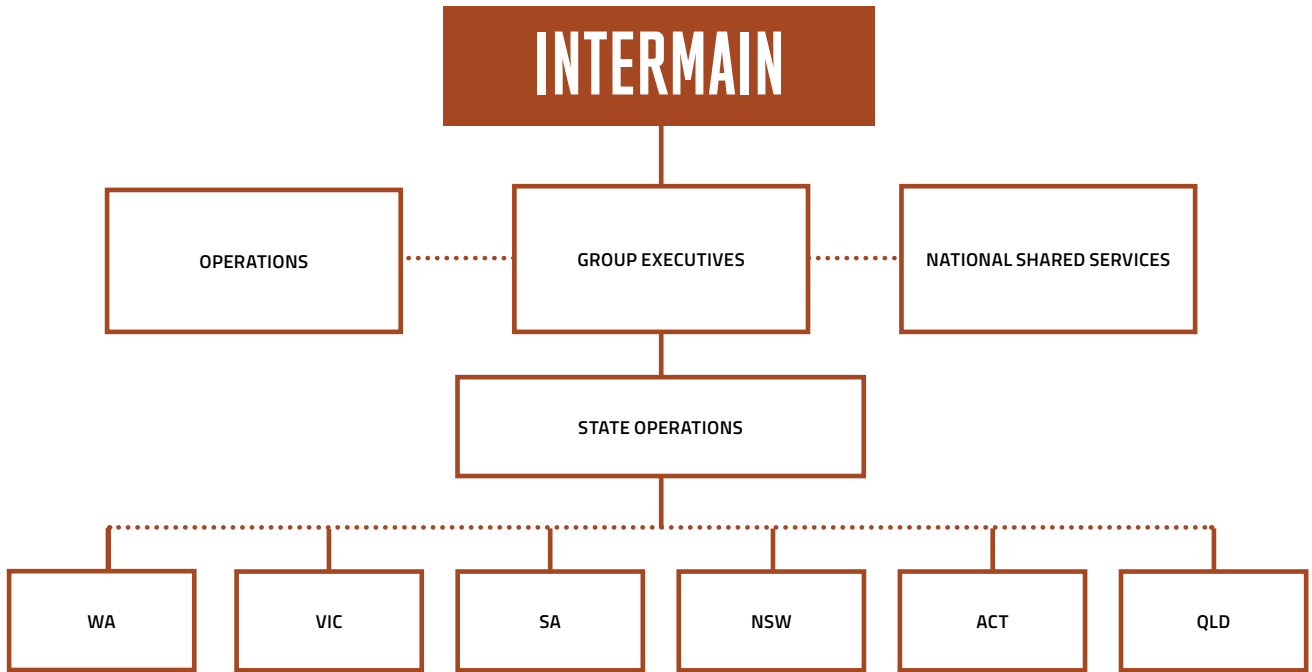
The responsibility for managing and ensuring compliance in our operations and supply chain rests with our Chief Operations Officer and HSEQ Compliance Officer, who are based in our Sydney office.

GROUP STRUCTURE



Each entity listed above is a wholly owned, subsidiary of our parent company Andrew Johnson Holdings Pty Ltd. These entities all operate under the same policies, procedures, plans and integrated management system governed and managed by the Intermain Board of Directors, our Management Team and our Senior Leadership Team.

ORGANISATION STRUCTURE



The responsibility for managing and ensuring compliance in our operations and supply chain rests with our Chief Operations Officer and BMS/WHS Officer, who are based in our Sydney office.



140 EMPLOYEES



4 OFFICES NATIONALLY

Intermain provides fitout, refurbishments, joinery and building services across a diverse range of industry sectors, including:



COMMERCIAL



INDUSTRIAL



GOVERNMENT



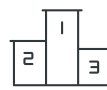
RE-USE & HERITAGE



EDUCATION



HEALTH & AGED CARE



SPORT & REC

03. RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS OF INTERMAIN

Intermain is committed to the highest standards of ethics and business integrity in our operations and supply chain. We aim to ensure our staff and suppliers are treated fairly, with respect and dignity, in order to uphold the said highest standards.

Intermain's foremost risk of modern slavery in our operations and supply chain, vests in our Subcontractors, who perform the required design, build, trades and project management related services, during the implementation and delivery of our projects.

All Subcontractors are required to comply with our Subcontractor Management procedure; being a formal documented process, which ensures: subcontractor engagement uniformity and standardisation, that is subject to on-going monitoring, review and improvement. Subcontractors are carefully vetted to ensure they align with our legal and contractual obligations. Similarly, our high ethical standards are at the core of how we engage

with our Subcontractors and is a reflection of how we work as an organisation.

We have considered the Modern Slavery List of Industries and List of High Risk Countries, as provided for in The Global Slavery Index 2018, in determining our risks of modern slavery in our operations and supply chain. We have further considered information and resources made available through organisations that includes:

- Transparency International Corruption Perceptions Index.
- Global Contact Network; Global Estimates of Modern Slavery 2017.
- Hidden in Plain Sight', Report of the 2017 Parliamentary Inquiry into establishing a Modern Slavery Act in Australia; and
- The Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities.

Locally based, we have identified four areas of high risk to modern slavery within industries, goods and/or services, amongst our subcontractors, namely:

- **ELECTRICAL EQUIPMENT**
- **ELECTRONIC EQUIPMENT INSTRUMENTS AND COMPONENTS.**
- **IT SUPPLIES AND SERVICES**
- **PEOPLE SERVICES**

We understand that our subcontractors source the vast majority of the goods and services within Australia, whilst the balance is predominantly sourced from countries with a low risk of modern slavery, which includes the USA, Singapore, New Zealand and Germany. .

WE HAVE IDENTIFIED FOUR AREAS OF HIGH RISK TO MODERN SLAVERY

01.



ELECTRICAL EQUIPMENT

02.



ELECTRONIC EQUIPMENT, INSTRUMENTS, AND COMPONENTS.

03.



IT SUPPLIES AND SERVICES

04.



PEOPLE SERVICES

04. ACTIONS TAKEN BY INTERMAIN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

In 2020, Intermain working in consultation with a third party consulting firm, conducted a modern slavery risk assessment of our operations and supply chain, creating a modern slavery framework, which assisted us in the preparation of our first modern slavery statement. The process was driven and headed by our Chief Operating Officer, supported by our internal Systems Administrator/Business Analyst, responsible for our creditors, and our HSEQ Compliance Manager, responsible for amongst others related: policy development; conducting risk assessments; training; conducting frequent inspections and site visits; and implementing preventative, detection and monitoring processes.

The assessment comprised two elements:

1. Identified existing risk management policies and procedures within Intermain and determined whether this can be broadened to include the Risks of Modern Slavery, through ethical sourcing, quality standards or other compliance reporting.
2. Conducting a risk assessment over our current suppliers in terms of our payment data, for a 12-month period 1 July 2019 to 30 June 2020. We extended this to include payments made to suppliers to 19 October 2020.



WE CONDUCTED A DESK TOP REVIEW OF 70 OF OUR TOP SPEND SUPPLIERS.

THE RESULTS IDENTIFIED THAT THE 70 SUPPLIERS SCORED AN OVERALL MODERN SLAVERY RISK RATING OF MODERATE TO LOW RISK.

In conducting a risk assessment of existing risk management policies and procedures, we reviewed all relevant policies including: Internal Audit; Subcontractor Management; Consultant Prequalification; Vendor Application; Purchasing- Hiring Materials & Equipment; Industrial Relations; Recruitment; Standard Terms of Employment; Offer of Employment; Code of Conduct; Appropriate Workplace Behavior; and Grievance's procedure.

We updated a number of these policy documents to make reference to and include the requirements of the Act. We further developed a Modern Slavery policy, Whistleblower policy and a Supplier Code of Conduct that makes provision for modern slavery.

In performing the risk assessment of our suppliers, we conducted a desk top review of 70 of our top spend suppliers, that comprise 93% of our total spend. 60 of these 70 suppliers are Subcontractors. Intermain considered risks that may potentially cause, contribute to or be directly participating in modern slavery practices, consistent with the Act and the Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities. These risks areas included: Financial; Industry; Country (geographic location); Subcontractors; and evidence that the supplier has submitted a modern slavery statement if applicable.

The results of our desk top review identified that the 70 suppliers scored an overall modern slavery risk rating of moderate to low risk. This is based on what was determined by us using publicly available records and information we had previously obtained from our suppliers.

We reported in our first modern slavery statement that we had recently created a vendor portal, which was still in its infancy. The said portal makes provision for use by Suppliers, Subcontractors and Consultants who wish to engage with Intermain. It includes a modern slavery questionnaire, that contains probing rather than generic modern slavery questions, which also provide for a risk rating for each relevant modern slavery question, and the submission of supporting documents to us where

applicable. We believe this is a vital step in identifying and where applicable, eradicating human trafficking and modern slavery, where there is any indication or slightest suspicion that this may be occurring.

Post 31 March 2021, we have progressed the vendor portal and specifically the modern slavery questionnaire. We confirm that the completion of the modern slavery questionnaire is a mandatory requirement for approval in our vendor portal.

To date 1,611 modern slavery questionnaires have been completed on the vendor portal. We commenced our evaluation of the answers provided in the questionnaire, but a complete review and clarification is still to be completed. 923 questionnaires have been approved, whilst the balance are in various stages of approval. This includes a significant number of vendors, 516, whose status is deemed to have automatically expired, meaning that an expiry date (such as insurances) on the vendor record has been met and the system has auto-expired the record to indicate it needs to be updated. The vendor must update expired content to be re-approved. We will, however, continue to assess them on the basis of 'completion' of the questionnaire and only review the answers and action once they are re-approved.

During the review stage, which is on-going, we have identified 4 vendors whose answers to the modern slavery questionnaire resulted in a potential overall risk of modern slavery, as their answers indicated risks of modern slavery. These vendors scored >8 out of 21 weighted questions answered. A score of 0 out of 21 would indicate no risk of modern slavery has been identified. We further identified several vendors whose overall risk of modern slavery was low (below 8 out of 21 weighted questions answered), but who provided adverse answers to specific modern slavery questions. These answers require further follow up with the vendors, where necessary, to determine that they understood the questions and to obtain additional information and context, for further assessment. We will do so in order to address our modern slavery risk obligations as provided for in the Act.



05. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

We have described our actions taken in the immediate assessment of modern slavery risk within our operations and supply chain. This includes policy review, drafting of new policies and a risk assessment for our high spend suppliers.

In doing so Intermain has mapped out key parts of operations and supply chains to improve understanding of potential modern slavery risks.



VENDOR PORTAL

All new and existing suppliers, subcontractors and consultants will be vetted for modern slavery risks through our vendor portal, the completion of a questionnaire that incorporates modern slavery requirements and the provision of supporting documents where applicable. The portal is now a prerequisite/precondition to the establishment of new suppliers. Intermain aims to use the portal and information obtained from this, to build transparent and collaborative relationships with suppliers and will further ensure that our expectations of reporting of modern slavery risks within the supplier's supply chain has been clearly communicated to us, and that we have satisfied ourselves that modern slavery risks have been effectively managed.



POLICY REVIEW

We will review our policies that now incorporate and make provision for modern slavery compliance and ensure that Intermain staff and Suppliers where applicable, certify that they have read and understand these policies, on an biennial basis. We will regularly review and improve our modern slavery internal controls and procedures in order to monitor their effectiveness and respond to areas that are not. This will include updating policies and procedures where deemed necessary.



06. THE PROCESS OF CONSULTATION WITH ANY ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS

The Intermain Group is centrally controlled and managed from Sydney by a tightly held group of shareholders of the ultimate holding company Andrew Johnson Holdings Pty Ltd. Modern Slavery requirements were discussed with this management group and a sub-committee was formed to work with a third party consulting firm to develop our modern slavery framework.



All new and enhanced policies were tabled for approval to the management team and all policies are rolled out to all companies within the group and business units simultaneously. All existing staff within the Intermain group have undertaken modern slavery training and feedback was encouraged. This training is now incorporated into our new employee induction onboarding process.

07. OTHER RELEVANT INFORMATION OUR WAY FORWARD

In order to build on the modern slavery framework we have established to date, we will be focusing on the following areas and the extent to which these are achievable:

01.
Continued management of our vendor portal, that includes review and evaluation of the modern slavery questionnaire and conduct further follow up with vendors where deemed necessary.

02.
Enhancing modern slavery training to our staff in the next calendar year. This may entail online courses, in-person meetings with management and/or written resources to address supply chain management, to understand in more detail what slavery and human trafficking entails and how to mitigate the risk of these in their respective supply chains.

04.
Developing internal accountability standards and procedures further, to hold our employees and contractors accountable for non-compliance with our standards on modern slavery and human trafficking, including:

- Establishing consequences for non-compliance.
- Establishing a process to remediate such breaches.

Intermain

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