

Introduction

BADGE Group Holdings Pty Ltd (“**BADGE**”) is a privately-owned construction company established in 1983 and operating in South Australia, Western Australia, Victoria, New South Wales, Northern Territory and Queensland. As part of our commitment to our operational values, we are committed to ensuring that the risks of modern slavery practice in operations and supply chains are identified, mitigated and remediated.

This statement describes the steps taken by our companies during the financial year ending June 2022 to assess and address the risk of modern slavery occurring in our operations and our supply chains.

Our Structure, Operations and Supply Chains

1. Structure and operations

BADGE is a privately-owned construction company operating throughout Australia and employing in excess of 300 direct personnel. Our business is conducted in both metropolitan and regional/remote locations of the country across a broad range of industry sectors including education, health, aged care, defence, retail, commercial office, industrial and recreation.

Our head office is located in Adelaide (SA) with other offices registered or satellite in:

- Queensland (Brisbane, Sunshine Coast & Gold Coast)
- Northern Territory (Darwin)
- Victoria (Melbourne)
- Western Australia (Perth)

Our business has been built over nearly 40 years by delivering a high level of product and service, coupled with ethical conduct across clients, suppliers, subcontractors, service providers and staff.

2. Supply chains

BADGE operations can be divided into two supply chain groups - those that are core to the construction arm of the business and those that are supplementary in its operations.

Core Business

1. Construction specific supplies and services including but not limited to:
 - a. raw material suppliers
 - b. plant and equipment suppliers for hire or purchase
 - c. design and consultancy
 - d. supply and installation subcontractors
 - e. construction support services, ie traffic management

Supplementary

2. Corporate and sundry suppliers and services including but not limited to:
 - a. corporate uniforms and branded merchandise
 - b. communications and information technology
 - c. legal and accounting

- d. cleaning
- e. motor vehicle purchasing and leasing
- f. temporary accommodation
- g. hospitality and catering
- h. office consumables

Modern Slavery risks and remediation

BADGE engages collaboratively with its subcontractors and suppliers fostering long term, transparent relationships. Further, our business has formal policies and procedures in place to promote legally compliant and ethical conduct across operations. These policies and procedures mitigate the risk of human rights violations that support modern forms of slavery, and include, but are not limited to:

- Equal Employment Opportunity policy
- Anti-discrimination, Bullying and Harassment policy
- Whistleblower policy
- Safety policy
- Workplace Grievance Resolution policy
- Employee Assistance Programme

These mechanisms allow employees and third parties to report concerns about suspected or actual improper conduct, including in relation to modern slavery.

Additionally, BADGE is accredited by the Office of the Federal Safety Commissioner, which subscribes to the Building Code 2016 and its principles of:

- freedom of association
- contracting compliance with Fair Work Act 2009
- mandatory procedures for engaging non-citizens and non-residents

Given the safeguards BADGE has in place to ensure legislative compliance and ethical conduct in its business operations, we consider that we are of low risk in being involved in the occurrence of modern slavery. Nevertheless, our audit process ensures we continually review operations with the intention of implementing further procedures and safeguards to assist in mitigating any risk of the occurrence of modern slavery.

Where we identify non-compliance in this regard, we will engage directly with the relevant stakeholders to restore compliance. Where the stakeholder's response is unsatisfactory to our business, we may terminate any contract and cease to further work with the stakeholder until satisfactory compliance is demonstrated.

As BADGE progresses its counter-slavery response, we will deepen our understanding of risk within our operations and supply chains and adapt our response accordingly.

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

We seek to do business with stakeholders who have aligning values, ethics and business practices - including those in relation to human rights. We understand that the risks relating to third-party stakeholders varies depending on industry, geographic location and company size. All BADGE personnel have a responsibility to prevent, identify and report any concerns they may have in relation to modern slavery that may be exhibited in BADGE operations and supply chains.

We will take any one, or a combination of the following actions to assess and address the risks and eliminate modern slavery in our supply chains and operations:

- Ensuring all subcontractors and suppliers comply with relevant legislative requirements, including modern slavery legislation;
- Primarily engaging with Australian registered businesses;
- Inclusion in contracts with subcontractors, suppliers and consultants, provisions requiring compliance with applicable legislation including but not limited to:
 - the *Modern Slavery Act 2018* (Cth)
 - Australian industrial law – Fair Work Act (Cth)
 - Work Health and Safety Act;
- Implement processes to assess the risk and monitor effectiveness of the associated procedures and policies;
- Maximising the procurement of Australian sourced materials and products;
- Maintaining long-term supply chain relationships;
- Educating employees on modern slavery and how to identify modern slavery within operations and supply chains.

BADGE expects all engaged third-party stakeholders to ensure there is no modern slavery in their own supply chains and operations.

Assessing effectiveness of actions taken to address modern slavery

The effectiveness of these processes will be monitored and reviewed on an annual basis, in alignment with our ISO9001 certified Quality Management System.

Process of consultation with entities owned by BADGE Group Holdings Pty Ltd

This statement has been prepared in consultation with senior management from the various BADGE Group Holdings Pty Ltd business entities.

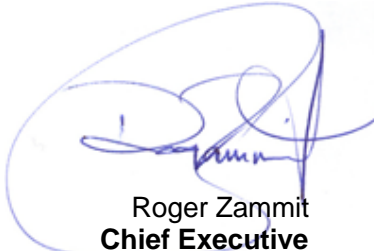
Approval of statement

This Statement has been prepared in accordance with Section 13 of the *Modern Slavery Act 2018* (Cth) and constitutes a Modern Slavery Statement. This statement was approved by Jim Whiting as the Sole Director and principal governing body of BADGE who will review and update it on an annual basis.

Signed in accordance with the requirements of the *Modern Slavery Act 2018* (Cth)

Date: 25/08/2021

Signed:



Roger Zammit
Chief Executive