



Paynters



Modern Slavery

STATEMENT

2021/2022

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REPORTING ENTITY

Paynters Pty Limited (Paynters) is a privately-owned Australian construction company. Our registered address is 7 Baroona Road, Milton QLD 4064.

Annually we design and construct more than 50 projects throughout Australia, with a presence in many key states and territories. Paynters has built a reputation on innovation and collaboration, delivering some of the very best design and construction solutions in Australia.

STRUCTURE

Paynters has around 190 direct employees and interact with around 7,000 subcontractors and suppliers each year. We manage a subcontractor and supplier workforce, rather than a self-delivery model.

Each project undertaken has an individual project delivery team who manage the project from initial design through the construction phase and on to final commissioning. The buildings we construct cover a range of industry sectors, including, Aged Care & Retirement Living, Hospitality, Entertainment & Leisure, Government, Education, Health, Aviation, Defence, Insurance, Retail & Commercial and Infrastructure.

Our supply chain has a mix of Australian subcontractors and some limited international subcontractors for specialist trades – such as rail system and turntable (Supplier in Bielefeld, Germany). The entities that Paynters engages with are primarily Australian registered entities, who may use supply chains overseas. A good example of that is tile contractors who manufacture typically in Italy.

RISKS

Paynters acknowledges that there are modern slavery risks within our operations and supply chains, which although low, will need to be monitored and managed.

We operate solely in Australia and are protected by Federal and State/Territory laws concerning industrial relations, work health and safety and human rights.

Paynters engages with its subcontractors and suppliers to make sure that they acknowledge and understand the importance of complying with Paynters' ethical requirements. Our goal is to maintain a culture of innovation, trust, respect and good banter. We are one team, all strong, all different, all supportive and we believe our values lower the risk of Paynters causing modern slavery within our operations.

Paynters understands that COVID-19 may have had a more significant impact on workforces and supply chains located in vulnerable geographies.

OUR APPROACH

At Paynters, we maintain policies and procedures that set out our minimum requirements and promote ethical behaviour and social responsibility. These policies and procedures are regularly reviewed and amended (where required) to ensure we develop and improve.

Our Code of Conduct and Whistleblower Policy details the minimum expectations for ethical and lawful behaviour, as well as reporting avenues. These apply to Paynters employees, our subcontractors and suppliers. We contractually require all of our suppliers and subcontractors to comply with all applicable policies and relevant legislation.

Paynters makes sure that our contractual documentation and the process we use for pre-approving members of the supply chain has appropriate questioning on modern slavery. As part of the tendering process all subcontractors and suppliers and consultants are to advise they have carried out due diligence on their own supply chain.

We conduct health and safety audits not only on our projects, but also on suppliers and subcontractors. Our due diligence procedures allows us to check and monitor the working conditions of construction workers on our sites and elsewhere in our supply chain to identify any unsafe conditions.

EFFECTIVENESS

Paynters have a telephone line and web-based contact form managed by an internal resource. These methods allow anyone to contact Paynters anonymously (if they choose) to report suspected unethical, illegal or unsafe behaviour.

Reports will be investigated by the Paynters internal audit team and Paynters will continue to conduct internal audits of our processes to ensure compliance.

CONSULTATION

Paynters consulted with Senior Management and described the key areas of concern to the Executive Leadership Team who developed this statement and presented to the Board of Directors for approval.

OTHER RELEVANT INFORMATION

Paynters is committed to improving its processes in respect of modern slavery and will continue to develop relevant training and due diligence.

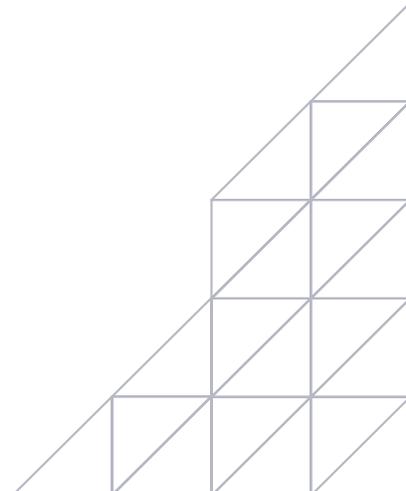
All Paynters employees will undertake general training under the Code of Conduct.

This statement covers 1 July 2021 to 30 June 2022 and has been approved by all Directors of Paynters Pty Limited on 23 November 2022. The statement has been signed by Sean O'Brien as a Director and Chief Executive Officer of Paynters Pty Limited.



Sean O'Brien
Chief Executive Officer
Paynters Pty Limited

Dated: 23 November 2022



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