

**woollam**  
SINCE 1884

# Modern Slavery Act

Woollam  
Statement  
2020

WORKING TOGETHER  
SETS US APART



## A message from the Directors

The strength of our company depends upon the strength of our Relationships - with our people, our clients, our contract partners and our communities. We strive to make a positive impact to the communities in which we work by paying it forward. We're committed to working together to support fundamental human rights and helping to put an end to modern slavery.


Be consistent and always do what we say we are going to do. It's how we've built trust, it's how we'll keep trust and it's how we'll continually improve as a business.

We have an amazing history and while we are incredibly proud of where we've come from, it is only a small part of who we are, what we're about, and where we need to be.

George and I have been fortunate enough to work under the guidance of Tom and Keith Woollam. We work hard to preserve their genuine family values around people and that includes keeping everyone safe. When we talk about building legacies we're not just talking about projects - more than anything it's about our people and our communities.

Be safe, have fun, work smart, and always strive for the best for our wider community.

WORKING TOGETHER  
SETS US APART




Our vision for a bright future,  
for everyone.

We exist to pioneer and advance  
the industry by driving safety,  
customer centric service and  
innovation towards higher levels of  
excellence.

We care about the people  
around us. Together we  
build and support thriving  
communities so our  
grandchildren's  
grandchildren can enjoy  
the legacies we create.

We support our  
communities to thrive  
and grow.

 WORKING TOGETHER  
TO BUILD LEGACIES

# Working together to support fundamental human rights.

Woollam has developed a plan, overseen by Woollam Executives, to strengthen our procurement management framework which incorporates actions and requirements to mitigate the risk of modern slavery.

We have undertaken high level assessments of our workforce, operations, and supply chains to identify where the Commonwealth's Modern Slavery Act 2018 may impact Woollam operations. Given the manufacturing journey of raw supplies and materials, we have determined that our greatest risk exposure is within the construction supply chain, and acknowledge that there is potential risk that exists within third party labour on construction sites.

We're committed to continuous improvement. Woollam has implemented a risk-based approach of engaging with our direct suppliers to educate, assess and encourage continuous improvement in their own capacity to manage modern slavery risks in their subcontractors and broader supply chain.

The processes that we are implementing includes educating our supply chain to ensure these risks are adequately managed. Where suppliers are found to be non-compliant with our contract terms requiring those suppliers to carry out remedial action, we will assist them to improve their processes.

This statement was approved by the Board of TF Woollam & Son Pty Ltd [T/A Woollam] on 22<sup>nd</sup> March 2021.



Craig Percival  
Managing Director



George Bogiatzis  
Director / Chairman

# Introduction

This is the first Modern Slavery Statement for Woollam, as informed by the Federal Modern Slavery Act 2018. The purpose of this statement is to outline our approach to minimise the risk of modern slavery in our business operations and supply chain.

At Woollam, we recognise that slavery and human trafficking can occur in many forms including slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

Woollam is committed to operating responsibly and establishing and adhering to the highest ethical standards across our services. We will not tolerate any forms of slavery or human trafficking in our business and are pleased to support a framework to eradicate modern slavery in the construction sector.

# Our History

The evolution of Woollam has paralleled the changing face of Australia. From a small family business started by an optimistic migrant in the late 1800's, the company continues to create buildings for the times in the heart of the cities, and right across regional Australia.


As the country's oldest privately owned construction company, Woollam has helped power local economies, shape communities and left a mark on the architectural heritage of our towns and cities.

For more than 135 years we have been delivering social infrastructure that helps communities grow and thrive.

From hospitals and emergency services to schools and universities; regional airports and retirement villages to sports stadiums and showgrounds; art galleries, aged care, car parks and everything in between, the Woollam name has become synonymous with forging long, trusted relationships alongside some of the most iconic buildings in Australia.

Woollam is proud to be recognised as one of the most trusted builders in Australia. We have our great people, relationships, and workplace culture to thank for this reputation. We understand the importance of respecting and improving human rights is fundamental to how we work with our customers, consultants, and contractors.

Woollam is a 100% privately owned Queensland company with just under 200 employees with offices in Brisbane, Ballina, Gold Coast, Mackay, Townsville, Rockhampton and Toowoomba. We have an amazing history and while we are incredibly proud of where we've come from, it is only a small part of who we are, what we are about and where we need to be.



**Building legacies**

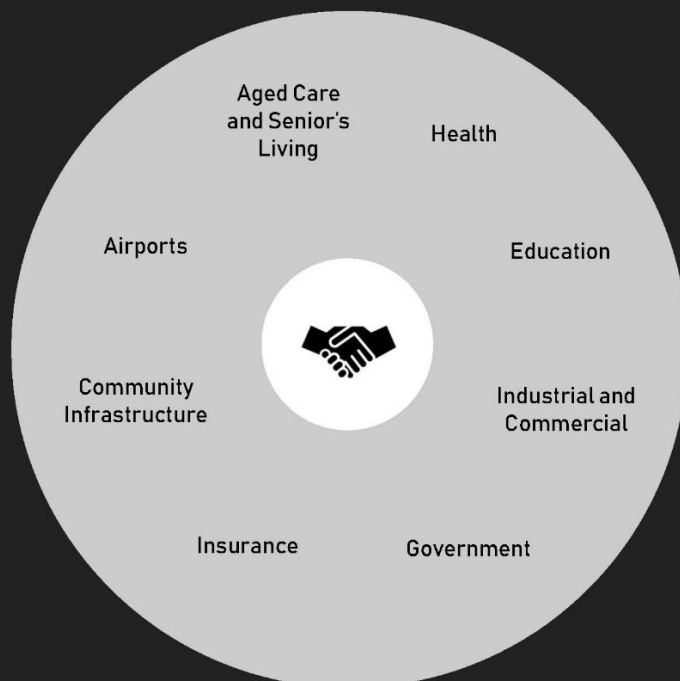
<p><b>1884</b> Thomas Woollam arrives in Australia from Scotland and establishes a building business in Clayfield, Queensland.</p>	<p><b>1926</b> Woollam forges through WWI, busy with Government contracts across the state. Thomas Woollam's grandson, Tom, takes over the family business to see it through WWII.</p>	<p><b>1980's</b> Current Woollam leaders join the company – Craig as an apprentice in 1989 and George as an estimating cadet in 1983 – rising through the business ranks under the guidance of Tom and Keith Woollam.</p>	<p><b>2000</b> George Bogiatzis takes over the position of Managing Director from Keith's son, Grant Woollam.</p>	<p><b>2016 5</b> Completed Queensland's only children's hospice, Hummingbird House.  Woollam Services is established to offer ongoing care to clients.</p>	
<p><b>1886 1</b> Regional roots begin constructing the iconic Breakfast Creek Hotel in Brisbane and the Bank of New South Wales in Rockhampton.</p>	<p><b>1908 2</b> Arthur Woollam (front row, fourth from right) as a foreman during construction of the Royal Brisbane Hospital.</p>	<p><b>1940's 3</b> While flying RAAF Lancaster Bombers, Tom's son Keith is shot down over Germany. He returns home after the War and spreads the company's stake throughout Queensland.</p>	<p><b>1988 4</b> After two years of construction, Woollam unveils the iconic Stockman's Hall of Fame with the Her Majesty the Queen.</p>	<p><b>2015</b> Craig Percival takes the reign as Managing Director and George Bogiatzis becomes Director.</p>	<p><b>2020</b> Having completed many of its own ventures already, Woollam Developments is born.</p>

# Our Structure, Operations and Supply Chain



## Our industries

We work for private and public companies across these key sectors.



# Our Seven Pillars

That drive continuous success

SAFETY



Everyone home incident free, every day.

PEOPLE



There are no boundaries for our people. Attract, develop and retain the brightest and best talent. Provide the greatest experience, a true one-team environment and genuine opportunities for continual growth and mastery.

CLIENTS



100 year relationships that build real value for our clients. Safe, reliable, smart, seamless experience.

PARTNERS



Relationships not contracts. Mutual, stable and consistent success for all involved.

COMMUNITIES



Strive to make a positive and sustainable impact to the communities in which we work by paying it forward.

FUTURE



Have an entrepreneurial mindset. Constantly improve everything we do. Foster an environment to test, progress, challenge and create a better, smarter, faster existence

SYSTEMS



Operational excellence by reliable, consistent, efficient customer centric focus.

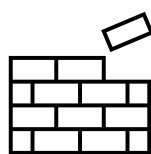
# Our Approach to Potential Risks in Our Operations and Supply Chains

**Covid-19** The construction industry, along with many industries throughout the world faced, and continue to face a pandemic. In response, we adjusted planned activities to address the immediate health, safety and well-being of our operational team members and the communities we serve. We ceased all non-essential travel between sites and regions and worked to keep our teams gainfully employed. We support sites and offices with regular companywide updates and provide training to support hygiene practices. We also initiated significant steps to support our suppliers in their response to the emerging labour and material risks within the supply chain such as alternative materials, products, and designs. It was this process and risk assessment that also helped identify supply chains that could be associated with modern slavery practices.

Woollam has zero tolerance for any form of slavery-like practices.

We have identified that our greatest risk exposure is within the construction supply chain and acknowledge that there is potential risk that exists within third party labour on construction sites.

## Key risks



**Raw materials that come from high-risk geographies**

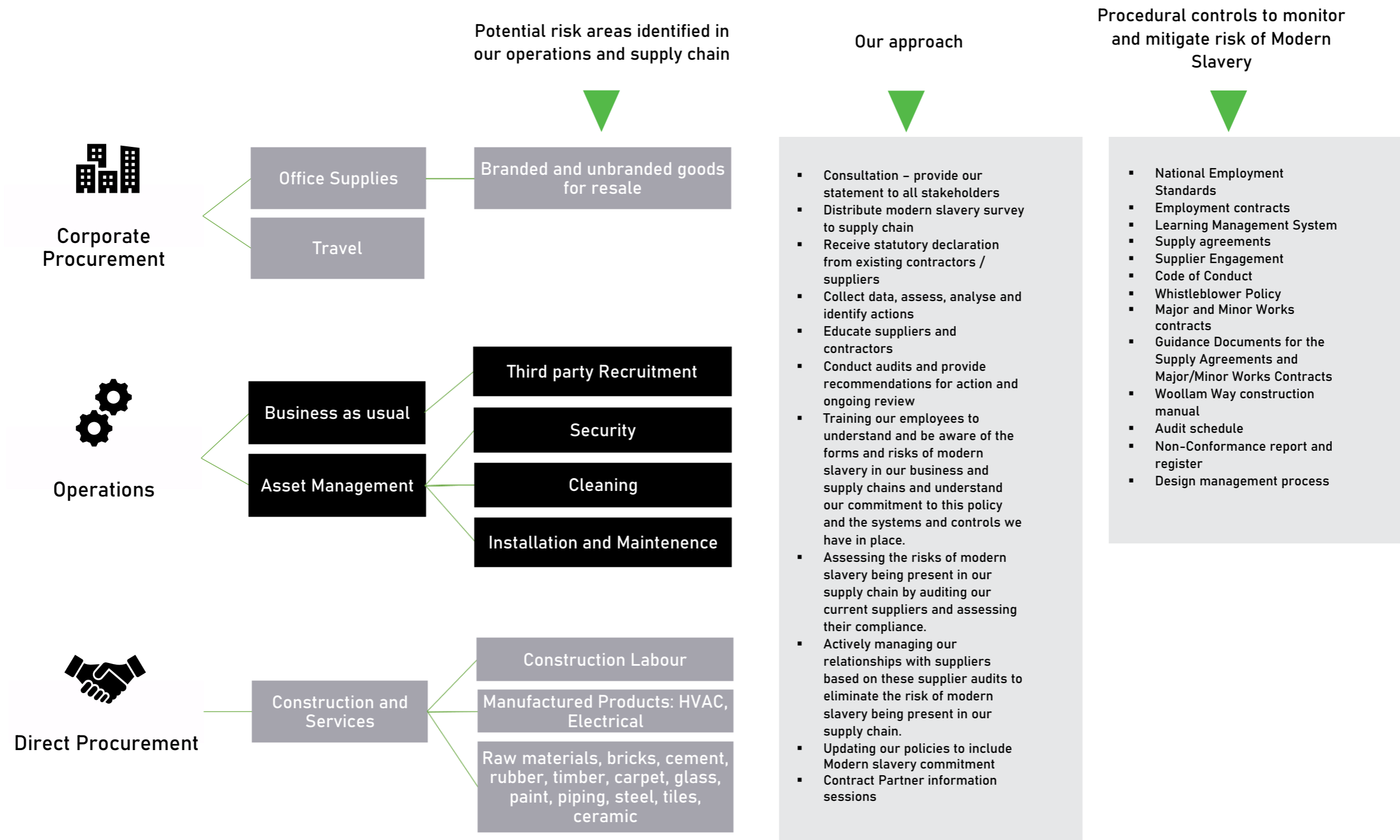
**Vulnerable populations for labour and more specifically, migrant workers**

As a result, we have established the governance process on the following page to provide the Board and Leadership Team oversight of the implementation phase as we embed the requirements into Woollam's existing Integrated Management System The Woollam Way.

We have formal policies in place that promote ethical and legally compliant business conduct. Our policies contribute to our commitment to prevent violations of human rights such as modern forms of slavery in our business.



# Woollam Governance for Modern Slavery Act 2018



## The Woollam Way Integrated Management System

The Woollam Way Integrated Management System is the system in which the company (T.F. Woollam & Son Pty Ltd) operates and conducts business. It refers to the processes and procedures that Woollam Constructions' have in place to manage the business.

It is not a specific document but rather a series of documented and non-documented processes that form a system in which the company meets its commercial needs. It is colloquially referred to as the "Woollam Way". Our suppliers play a vital role in supporting our business activities, and our reputation depends on the quality of the services they deliver. For this reason, we work closely with our contract partners to ensure they share our values. Our supplier relationships are founded on collaboration and respect.

Below we detail key processes which exist as part of the Woollam Way to mitigate the risk of Modern Slavery in our business, our contractor's businesses, and their engaged supply chains.

### Contract partner and supplier prequalification

As principal contractors we are responsible for the performance management of all subcontractors and suppliers (referred to by Woollam as contract partners to initiate a more collaborative relationship). Contractors wishing to engage with Woollam are required to be assessed and approved based on strict prequalification criteria.

Our contract partner prequalification and management process assess:

- All applicable licences for the work which they will be undertaking in accordance with the contract.
- All applicable insurances required under the contract terms and conditions.
- Complete a compliance background check which includes Workplace Health and Safety compliance.
- Undertake a pre-award tender interview process.
- We assess the capability to complete the contract works, including:
  - Compliance with Woollam protocols, procedures, relevant Acts and Codes.
  - Sufficient plant and equipment.
  - Sufficient labour resources required to meet programme.
  - Understanding of programme requirements.
  - Check all commercial references.
  - Local content.
  - Define and sign off the contract scope of works. All subcontracts must complete a site inspection prior to award and complete their own Site Management Plans.

### Project purchasing procedure

The Project Purchasing Procedure assists in the preparation of the assessment process for letting subcontracts and supply agreements for the approval by Woollam management. A tender contacts list is developed for the trade package from trade partners who have been prequalified to work with Woollam.

### Declaration of Compliance

As part of Woollam's request for tenders, tenderers are required to complete a Declaration Of Compliance With The National Code Of Practice For The Construction Industry And The Australian Government Implementation Guidelines, which we have amended to also reference compliance with the Modern Slavery Act.

The Declaration of Compliance must be completed by potential trades and suppliers [the Tenderer] and lodged with its Tender. Any Tender in which this schedule is not completed may be regarded as Informal and not considered further in the evaluation of Tenders.

### **Contract partner tender interview**

This is a formal and personable engagement with potential contractors and suppliers which specifically discusses the obligations of compliance with our company policies and legal requirements that we operate under including the Modern Slavery Act. The process also investigates and records the nature of the contract partner's business and processes. Contract Partner tender interviews are conducted with those who have submitted pricing for a project or opportunity [typically four contract partners or suppliers per available trade package].

### **Approval to let**

After tender interviews have been completed and Scope of Works agreed and signed, the Project Team selects a preferred Contract Partner and completes an Approval to Let which is submitted with the Contract Partner Tender Interview form which specifically addresses the risks around modern slavery. Senior Management must review and approve, inclusive of 3 reference checks via the Contract Partner Reference Check Form.

### **Supply Agreement**

Contractors and suppliers who are selected by Woollam to undertake relevant works are provided with a legally binding agreement in which the Principal [Woollam] and the Supplier have agreed that during the Term the Supplier will carry out the Supply in accordance with the terms of this Agreement.

### **Grievance mechanisms**

We encourage our people and suppliers to report any suspected breaches of our policies and/or the presence of Modern Slavery in our supply chain through our Whistle-blower reporting procedure.

## **A brighter future for all**

Over the next year, Woollam will continue to review internal operations and employment arrangements and making the necessary amendments to mitigate risk of Modern Slavery entering our direct employment practices.

### **Supply Chains**

- Woollam will continue to develop the maturity of our Contractor selection, management and auditing, including taking the new Modern Slavery provisions into account
- We will conduct a deep assessment of identified supply chains (e.g. Personal Protective Equipment and Marketing products) and taking the necessary action to tighten
- We will be issuing letters to all our supply chains informing them of our commitment to ensuring our business and supply chains are free from modern slavery
- mitigating risk by asking our suppliers to complete a survey which identifies any potential risks within their supply chains

## Community

Woollam will be identifying and executing an initiative that helps promote the eradication of Modern Day Slavery in the community.