



Total Construction Holdings Pty Ltd (ABN 69 131 766 820)

2021/22 Statement of Commitment

to the *Modern Slavery Act 2018*.

14 January 2022

Reporting Entity and structure

Total Construction Holdings Pty Ltd (Total) provides this statement on behalf of both of its wholly owned subsidiaries, Total Construction Pty Ltd (ABN 32 067 732 941) and Total Special Projects Pty Ltd (ABN 19 137 910 840).

Operations and supply chain

Total is a commercial construction entity that has permanent offices in Sydney, Melbourne and Brisbane and conducts its operations solely within Australia. Total provides innovative construction solutions across the aged care, health, food, and beverage, commercial, industrial and education sectors. Total strives to work with stakeholders who are aligned with our core values of: Accountability | Integrity | Mentorship | Respect | Collaboration | Ingenuity.

Identification of the risks of modern slavery practises within our operation and supply chain

Total prides itself on its strong commitment to ethical business practises. To this effort, the Total team is committed to our core purpose of *making a positive difference in people's lives through excellence in construction*, including by extension our responsibility to align with practices that identify and manage modern slavery risks through the *Modern Slavery Act 2018*.

As a construction company, Totals understands that it faces an elevated risk of modern slavery within its operations and supply chain because of the demand for base-skill workers who are vulnerable to exploitative practises, and for raw materials that are often sourced from high-risk geographies. This is further exacerbated by poor visibility over long and complex supply chains. We acknowledge we operate in a business reliant on a diverse range of suppliers and products that can potentially leave our business exposed.

Actions taken towards assessing and addressing modern slavery risks and impacts.

Our aim is to mitigate the risk of modern slavery practises by applying a systematic approach which includes the following actions:

- Total has formed a dedicated internal committee that is chaired by the CEO and meets bi-monthly to review the effectiveness of our modern slavery statement and plan and ensure continual improvement.
- Total will install modern slavery guidance material at all its office and construction site locations by the 30th June 2021.
- Total will deliver training and information seminars for all our employees to educate them on identifying modern slavery risks by 30th June 2021.

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- Total will implement requirements within the tender and procurement phase (e.g. within our standard terms of contract) for our supply chain to warrant that they will assist Total in achieving the objectives of our modern slavery statement by the 30th April 2021.
- Total has developed internal and external reporting channels for the purposes of monitoring and reporting grievances via a Whistle-blower mechanism that is publicly available on our website and intranet by the 30th April 2021.
- Total will commence an assessment process of mapping our operations and supply chain to identify high risk areas by developing an appropriate questionnaire and database by 30th June 2021.

Assessment of the effectiveness of actions taken.

Effectiveness of the actions taken above will be the responsibility of our Modern Slavery committee to review and report to the board of directors on a half yearly basis.

Measurements will include:

1. Completion of deliverables as stated above.
2. 100% competency achieved for all staff following the training and information seminars.

Process of consultation with all entities within the group

All entities within the group share the same corporate governance function and therefore the elements of both this statement and the modern slavery plan across Total are consistently applicable and do not require additional consultation.

Other Information considered relevant.

The progress of our modern slavery plan has been disrupted by COVID-19 with regards to the extent of implementation of both the training and assessment processes, however this statement reflects the impacts to date.

Total recognises that financial hardship can contribute to increasing the risk of modern slavery within our supply chain and therefore additional resources and focus have been placed on our accounts payable function to mitigate disruptions to our payment process.

This statement was approved by the Board of Directors for Total Construction Pty Ltd on 30 September 2021.

This Statement is signed by Steve Taylor in his role as the Director of Total Construction Holdings Pty Ltd and Bill Franks in his role as the Director of Total Construction Holdings Pty Ltd on 14 January 2022.



Stephen Taylor
Director of Total Construction Holdings Pty Ltd
14 January 2022



William Franks
Director of Total Construction Holdings Pty Ltd
14 January 2022