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# Introduction

The ILO's Global Estimates indicates:

- there are 50 million people in situations of modern slavery on any given day; and
- sixteen percent of all adults in forced labour exploitation, 2.6 million people, are in the construction industry. Many cases involve migrant workers whose situations of forced labour stem from extortionate recruitment fees and other fraudulent recruitment practices of unscrupulous labour intermediaries.

Significantly, at least 22% of forced labour victims are found in the manufacture and production of raw materials including in forestry, mining and quarrying – key suppliers for property and construction.<sup>2</sup>

According to a report in 2018 by the UK Chartered Institute of Building, modern slavery was recorded to generate approximately \$150 billion USD per year worldwide, with this figure likely increasing over the past five years. Focusing on the global construction industry approximately \$34 billion USD of the estimated amount comes from the construction, manufacturing, mining, and utilities industries.<sup>3</sup>

The Modern Slavery Review undertaken by the Australian Government singled out three key points which were highlighted as the targets for legislative change. These included an improvement in the standard of modern slavery reporting, enforcing the reporting obligations of entities and addressing incompatible Modern Slavery Statements.<sup>4</sup>

As the Global Slavery Index categorises Australia as low risk for modern slavery, Roberts Co considers that it is likely to have a low risk of modern slavery practices in its permanent workforce<sup>5</sup>. Roberts Co is aware that there is a greater risk of modern slavery that exists in its supply chains, rather than its permanent workforce. Roberts Co's goal is to eliminate modern slavery in its operations and supply chains. Achieving our goal continues to be a multi-year project and requires all of us to work together to protect the rights of the world's most vulnerable people.

<sup>&</sup>lt;sup>1</sup> ILO Global Estimates of Modern Slavery September 2022 https://www.walkfree.org/reports/global-estimates-of-modern-slavery-2022/

<sup>&</sup>lt;sup>2</sup> Australian Human Rights Commission, "Property, construction & modern slavery" 2020

<sup>&</sup>lt;sup>3</sup> The Chartered Institute of Building, "Construction and the Modern Slavery Act" 2018 https://ciob.org/sites/default/files/Construction and the Modern Slavery Act\_0.pdf.

<sup>&</sup>lt;sup>4</sup> Australian Government Attorney-General's Department, Report of the Statutory Review of the Modern Slavery Act 2018 (Cth) https://www.ag.gov.au/crime/publications/report-statutory-review-modern-slavery-act-2018-cth

Walk Free 2023, The Global Slavery Index 2023 https://walkfree.org/global-slavery-index/

# About us

This Modern Slavery Statement is made by Roberts Co Australia Pty Ltd ABN 83 616 561 678 for the year ended 30 June 2024 (FY24) pursuant to the Modern Slavery Act 2018 (Cth) (Modern Slavery Act). Roberts Co is a privately held company committed to driving positive change in the Australian construction industry. It operates within Australia via its wholly owned subsidiaries, Roberts Co (NSW) Pty Ltd and Roberts Co (VIC) Pty Ltd, which are also reporting entities. Roberts Co also operates Roberts Co (WA) Pty Ltd and Monaco Hickey (a division of Roberts Co (VIC) Pty Ltd), which for the purpose of this statement are not reporting entities. This statement is submitted by Roberts Co Australia Pty Ltd on behalf of itself and the aforementioned subsidiaries. When we refer to "Roberts Co", "we" "us" or "our" in this statement, it is a reference to the three reporting entities and the Roberts Co subsidiaries.

# **Our values**

We exist to do good, not just make good. To look forward. To innovate. To push. To lead. To change.

We recognise the inherent dignity of all people and the importance of respecting and promoting human rights, including the rights of our employees, suppliers and the communities in areas where we operate.

We also expect our suppliers and contractors to respect and promote human rights and encourage any joint ventures to adopt a similar approach.

Our approach to assessing and addressing modern slavery, as well as broader human rights, continues to be guided by the United Nations Guiding Principles on Business and Human Rights. In keeping with our hallmark ambitions underpinned by "how we interact with and care for our people, industry partners and the community" and our desire to "drive change in the Australian construction sector", Roberts Co is committed to adopting industry best practices and standards as part of the global efforts to eradicate modern slavery.

Our values are an expression of what is important to us. Consideration of human rights and modern slavery is integral to our broader commitment to diversity, inclusion, wellbeing and aligns strongly with our organisational values shown:



## **Empowered People**

Strong leadership is in place at Roberts Co, but our flat structure gives everyone a voice. We believe in empowering our team to be the best they can be - exceptional ideas are encouraged and supported no matter who they come from.



## **Working Smarter**

We're concerned with getting things done right and making a difference. We seek teams of diverse thinkers and pivot as needed to increase value and efficiency. We embrace technology and use it to improve our projects, our productivity and our work/life balance.



## **Relationship Driven**

We build relationships as well as projects, fostering true partnerships that stand the test of time. We respect the expertise of our colleagues, clients, subcontractors and consultants because we know it takes a team to build a project.



#### **Creating Value**

We take our work personally and will always offer design smarts to enhance our clients' results. We're creative thinkers and problem solvers, determined to deliver solutions, not excuses

# **Our structure**

Roberts Co is an Australian based, and owned, tier-one construction company delivering design and construction services within the states of NSW and Victoria.

#### We have three teams in our operations, namely:



1.0 New business



2.0 Project delivery and design



3.0 Corporate services, including: finance, HR, legal, IT and commercial

Our registered office for all Roberts Co subsidiaries is Level 9, 60 Castlereagh St, Sydney NSW 2000, which is also the principal place of business for Roberts Co (NSW) Pty Ltd. The principal place of business for Roberts Co (VIC) Pty Ltd is Level 17, 140 William St, Melbourne, VIC, 3000.

# **Our operations**

During FY24, Roberts Co employed 239 personnel and had sixteen active projects across NSW, Victoria and Western Australia. A breakdown of our personnel by employment type is set out below:

	NSW	VIC	WA
Staff Total	103	124	6
Construction Worker	33	53	0
Trainees & Apprentices	3	0	0
Contractors	4	13	4
Female (staff)	30%	17%	33%
Female (overall)	27%	13%	33%

# Construction, processing and production

As a tier one contractor, Roberts Co delivered work for both private and government clients within New South Wales, Victoria and Western Australia, inclusive of commercial, education, residential, health, pharma, hospitality and Defence. Roberts Co assists its clients to provide professional consultancy, design, engineering, environmental, assurance, project and cost management services in the construction sector. Our teams comprise of project managers, engineers/coordinators, commercial managers, supervisors and HSE professionals who help our clients achieve success through all stages of a project lifecycle, from the design and consultation of projects, through to the design, delivery and asset management.

See overleaf section on "Our Projects" for a list of projects completed by Roberts Co in FY24.

# **Our projects**

During the FY24, we worked on 16 key projects across New South Wales, ACT, Victoria and Western Austrlaia. Those projects were:



#### The Children's Hospital at Westmead Stage 2 - PSB

The PSB is a high-rise state-of-art paediatric hospital consisting of new front and back of house facilities; PICU; NICU; inpatient units and family focused retreat areas.



#### **HOME Parramatta Completion**

A 47 storey Build to Rent tower comprising 428 purpose built dwellings geared towards permanent renters.



#### **Moxy Sydney Airport Hotel**

A new 13-storey hotel comprising 301 hotel rooms; reception, lounge/waiting area, café, library, restaurant and back of house services on the ground floor. Moxy Sydney Airport was completed in July 2023.



#### **BioNTech mRNA Facility**

A three level Research and Development facility which includes laboratories, write up spaces and supporting areas; production area; and warehouse and production support area comprising quality control and testing, product storage and back of house production support.



#### Carlingford & Cumberland Schools Package

The package involves the delivery of new buildings and refurbishment works for the Carlingford West Public School and Cumberland High School.



#### **502 Albert Street**

4.5-star boutique hotel, including pool and spa facilities, gymnasium and guest lounge. The 15-level tower will include 140 hotel rooms; two basement levels; food and beverage on ground floor; and a rooftop terrace on level 14. 502 Albert Street was completed in June 2024.



#### Cumberland West Mental Health Services Relocation Early Works

Early works package encompassing critical enabling works to prepare the site for the delivery of a new purposebuilt mental health complex.



# MEL9 Automated Robotic Distribution Centre

240,000m² automated robotic
Distribution Centre, consisting
50,000m² on ground level for material
handling, receival and dispatch areas;
three levels of automated product
storage and retrieval areas totaling
150,000m², and an additional 40,000m²
of plant, staff amenities and office areas.

04



#### 130 Little Collins

A state-of-the-art commercial precinct at 130 Little Collins in Melbourne's CBD, with 27 levels of premium strata office space.



#### 3 McNab Avenue

Comprising 702 Build to Rent Apartments over 3 Buildings at 19 storeys, 16 storeys and 8 storeys, the precinct will include 275 carparks and amenities including gymnasium, co-working space, private dining, lounge and games areas and a rooftop basketball court.



#### **UNO Melbourne**

A 65 storey apartment building, including the restoration of the heritage façade, excavation and construction of a new two-level basement back to ground level. UNO Melbourne was completed in December 2023.



## Wentworth Point High School

The school incorporates learning spaces specific to senior school requirements. Split across six levels, the school also includes a library, administration, staff areas, student services, a canteen, outdoor covered workshop and a quadrangle. WPHS was completed in July 2024.



#### **Oasis Residences**

The high-end development comprises 19 storeys including 158 residential apartments and 97 serviced apartments.



#### 500 Bourke

Redevelopment of a 40-storey high rise office building at 500 Bourke Street, including services upgrades, lobby upgrade and new amenities. 500 Bourke Street was completed in December 2023.





#### **The Dunes Forward Works**

The forward works consists of the perimeter piling and bulk earthworks to prepare the site for the delivery of the main works.



# Macquarie Exchange Precinct Project (MQX4)

MQX4 is the first of four new commercial office buildings that will form the centre of Macquarie Exchange – Australia's first community business district. MQX4 was completed in July 2023.

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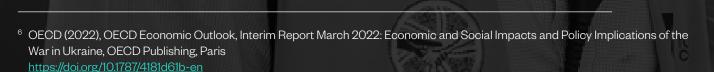
19

# The impact of the Russia-Ukraine War

We continue to be mindful of the Russia-Ukraine War on our business, supply chains and our community over this past year.

The impacts of the war in Ukraine along with the ensuing economic sanctions on Russia with the potential for its retaliation, have seriously affected global markets. This has been felt in the increasing prices of oil, gas and subsequently fuel, with developing economies feeling the worst of these increases<sup>6</sup>. Uncertainty has also affected the markets relating to metals produced in Russia which are crucial in manufacturing, including aluminium, nickel, palladium and vanadium<sup>7</sup>.

This has been made evident in the prices of aluminium and copper which reached a 10-year high in early 2022<sup>8</sup>. As this increase of price has caused issues across all industries which require raw materials, including our own - we remain conscious to the fact that more individuals involved in the distribution of these materials are at greater risk of exploitation due to the decrease in available supply. Accordingly, we are conscious of the impact that this war has on those involved in the extraction and distribution of such raw materials listed.



OECD (2022), The supply of critical raw materials endangered by Russia's war on Ukraine, OECD Publishing, Paris <a href="https://www.oecd.org/ukraine-hub/policy-responses/the-supply-of-critical-raw-materials-endangered-by-russia-s-war-on-ukraine-e01ac7be/">https://www.oecd.org/ukraine-hub/policy-responses/the-supply-of-critical-raw-materials-endangered-by-russia-s-war-on-ukraine-e01ac7be/</a>

https://openknowledge.worldbank.org/server/api/core/bitstreams/d35940a5-0f3e-5835-81c7-24f7d134c62c/content

<sup>8</sup> WorldBank (2022), Special Focus: Pandemic, war, recession: Drivers of aluminium and copper prices, Commodity Markets Outlook - October 2022

# 02 About us

# Our supply chain

In FY24, Roberts Co's procurement spend was approximately \$620m which was an increase of \$150m from the previous financial year. The main categories of spend from our project teams and finance, HR, legal, IT and commercial team remain largely unchanged from year to year. An overview of the categories is set out below.



## Project teams

Items denoted with \* are manufactured overseas

#### Subcontractors and labour

- Construction survey
- Traffic control
- Masonry works
- **Painting**
- Turntable
- Electrical security comms services
- Fire protection services
- Hydraulic services
- Lift services
- Mechanical and **BMS** services
- Demolition / earthworks
- Reinforcement fix
- Construction site cleaning
- Engineering
- Architectural services
- Labour hire
- Site security
- Waterproofing services

#### **Materials**

- Concrete
- Reinforcement supply
- Pipes

#### Materials and labour

- Hoarding
- Scaffolding
- Access flooring
- Carpet and flooring
- Windows
- Metalwork
- Ceilings and partitions
- Green walls
- Air conditioning
- Electrical and data services
- Doors and frames
- Inter-tenancy stairs

- Concrete supply and place
- Façade\* such as glass, aluminium, terracotta, Fibre C, GRC and aluminium cladding
- Formwork
- L2 transfer wall prefab cage
- Podium façade
- Post tensioning
- Tiles\*
- Stone\*
- Joinery\*

#### Equipment

- Hoarding and jumpform signage
- Loading platforms
- People and materials hoists
- Rubbish bins
- Site sheds
- Tower crane
- **Appliance**

# Finance, HR, legal, IT and insurance

- IT software
- IT equipment
- Merchandise
- Corporate travel and hospitality
- Catering
- and insurance
- Insurance broker
- services
- Advisory services, including professional services
- **Training**
- Recruitment
- Office supplies Office cleaning
- Utilities
- Rent

Of the above, our top spends categories were: subcontractors, labour and materials.

Our major sourcing regions were:

- Australia
- China
- South East Asia
- Europe

Most of our direct suppliers are domiciled in Australia, although they often supply goods or services sourced from other jurisdictions. Our subcontractors mostly supply the construction materials to be used on our projects, so this limits our visibility of the risks associated with these parts of our supply chain. Transport and logistics are also primarily acquired by our suppliers, subcontractors or their suppliers. We require and expect that our suppliers to comply with all applicable regulations and legislation relating to working hours, wages, welfare and human rights.

# The risks of modern slavery in our operations and supply chain

The risk of modern slavery practices within our business were assessed on their potential to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains, as grounded in the human rights due diligence framework outlined in the United Nations Guiding Principles on Business and Human Rights. Roberts Co considers there is a greater risk of modern slavery existing in its supply chains, particularly in jurisdictions outside of Australia, including third party labour hire providers as well as migrant workers.

# In our operations

The Global Slavery Index 2023 estimates that on any given day in 2021 there were around 50 million people living in situations of modern slavery, of which 28 million were subject to forced labour. <sup>9</sup> These figures have increased since 2021, with construction and manufacturing being identified as high-risk sectors. <sup>10</sup> In this context, we recognise that modern slavery risks exist in Australia and are heightened in the construction sector. However, having regard to the following factors, the risk that we have caused or contributed to modern slavery in our operations remains low:

- Our executive leadership team continues to meet regularly to discuss business risk, which ensures that they have visibility of the risk of modern slavery in our operations and the controls adopted to manage those risks.
- We maintain strong human resources controls in place for onboarding new employees, reviewing employees' wages and salary agreements, and verifying corresponding payments. These form part of our Integrated Management Systems that control the processes within our businesses.
- Approximately 26% of employees are covered by enterprise or industrial agreements.
- Our employee on-boarding processes include working rights employment checks managed by our Human Resources function.
- Our employee induction processes also ensure that new employees confirm they have read and understood our policies and minimum standards.
- Human rights and Modern Slavery are part of our induction processes ensuring that everyone working on our projects has a basic awareness of the risks and ways to report.
- We do not have operations or employees overseas.

Walk Free 2023, The Global Slavery Index 2023, https://walkfree.org/global-slavery-index/

Walk Free 2023, Modern Slavery What Business Needs to Know 2023, https://cdn.walkfree.org/content/uploads/2020/10/06154702/Mi170847-Toolkit-Primer\_DIGITAL.pd

# In our supply chain

The selection of construction materials is often made by either the customer (where a particular material is specified, which can only be sourced from one supplier) or the subcontractor supplying labour and materials. It is difficult for a construction company such as ours to have visibility across the multiple tiers in the supply chain of the numerous components and raw materials that are used on all of our construction sites. However, as part of our due diligence efforts, we periodically review and assess our procurement data for modern slavery risks and endeavour to keep abreast of emerging or evolving risks relevant to the construction sector.

Materials and construction services, including labour hire are the main areas of higher risk in our business. Modern slavery risks can be exacerbated by a number of factors relevant to the construction sector, some of which are listed below:

- prevalence of outsourcing, which can impact upon operational and supply chain transparency
- contract terms with low margins and significant pressure on delivery times
- reliance on a migrant workforce with limited local language competency and temporary visa arrangements
- jurisdictional risk and industry risk in the supply of some construction materials
- multiple sub-contracting arrangements with informal agreements
- low barriers for entry for labour hire providers
- dangerous or substandard working conditions, including:
  - workers are not paid fairly or withheld entitlements
  - » workers may be required to work excessive hours
  - » workplace safety concerns
  - » control of workers' freedom of movement or association
  - withholding unreasonable fees for housing, transportation, food and other services

Debt bondage is one of the slavery-like practices that can occur in the construction sector where bonded labourers have to work to pay off debts that are often greater than the wages earned, resulting in an inability to leave. We are not aware of any instances of debt bondage at our sites.

The majority of our suppliers are domiciled in Australia. They predominantly provide labour and materials, as well as services. The materials used in the construction sector are often produced in countries where modern slavery is a greater risk, which means that modern slavery risks may exist in our supply chain well beyond the second or third tier across multiple procurement categories. The transport of these materials to Australia also creates modern slavery risk (noting that transport and logistics are inherently high risk for modern slavery). Roberts Co acknowledges that may it procure from high-risk countries and regions such as China, South East Asia and aspects of Europe.

This means that, although there is a lower risk that our business has caused or contributed to modern slavery, our connection to modern slavery exists via our supplier relationships and their respective supply chains.

Based on our updated risk assessment for FY24, we consider the following construction categories to contain an increased risk profile. Our assessment involved looking at the inherent industry risks linked to the potential utilisation of higher risk components or raw materials and the potential utilisation of vulnerable categories of workers in the production of the materials.

- Ceilings and partitions
- Podium façade
- Stones
- Tiles
- Steel
- ConcretePVC pipes
- Site sheds
- Scaffolding
- · Demolition and earthworks
- Formwork

- Reinforcement fix
- Façade
- Masonry works
- Painting
- · Doors and frames
- Loading platforms
- Hoists
- Rubbish bins
- Tower cranes
- Service plants and equipment

#### Emerging risks - PVC materials

A report was published in June 2022 by Sheffield Hallam University and the Helena Kennedy Centre for International Justice in relation to the increased manufacturing of PVC in the Uyghur region in China, the manufacturers' use of statesponsored labour transfers and the routes by which the resulting PVC-based products may make their way into international markets.11 Most products made from PVC are used in building and construction in the form of pipes and vinyl flooring. China is the world's largest producer of PVC and 20% of China's PVC comes from the Uyghur region which has been linked to forced labour. The report states that "state-sponsored labor transfer programs are tantamount to forcible transfer of populations, forced labor, human trafficking and enslavement". In light of this report, we recognise there risks in the PVC pipes and flooring materials that we use on our construction sites which warrants further due diligence.

In addition to the risks associated with procurement in the construction sector, there are also modern slavery risks in the goods and services procured for our office operations supporting our finance, HR, legal, IT and insurance. For example, there are inherent risks in production of the corporate merchandise and supplies we purchase as well as the IT hardware that we use day to day. We also recognise the modern slavery risks in the cleaning sector arising from exploitative labour practices.

<sup>&</sup>quot;https://www.shu.ac.uk/helena-kennedy-centre-international-justice/research-and-projects/all-projects/ built-on-repression

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

We recognise our responsibility under the UNGPs to provide or participate in the remediation of any identified human rights impacts that we cause or contribute towards, and we understand that business can contribute or be directly linked to modern slavery practices.

Roberts Co identifies risks of modern slavery in its business by maintaining a robust procurement process to help mitigate modern slavery risks by including additional modern slavery checks into its recruitment and onboarding processes for new employees and suppliers. Roberts Co within the last reporting period conducted a review on these processes and documents to ensure that these checks were still fit for purpose. Roberts Co reviewed their Whistleblower Policy to ensure that modern slavery controls operate appropriately within the compliance and whistleblower reporting process.

During the course of the Reporting Period, we have not identified any reports that could be linked to modern slavery. If we found that our business had caused or contributed to modern slavery, we would take guidance from the UNGPs, which provides that businesses in this situation need to remediate the impact by taking a person-centred approach protecting the safety, privacy and wellbeing of the affected person. We would investigate the situation to ensure that an appropriate corrective action plan is implemented and assess how similar impacts could be avoided in the future.

# 04 Actions

Our work during FY24 built upon the goals set out in our FY23 statement. Our existing policies and procedures are described in Annexure A.

We progressed most of the goals that we set for ourselves in our FY23 statement to ensure that our approach to assessing and addressing modern slavery risks remains effective. In summary, the actions we have taken in FY24 are set out below:

- (1) Modern slavery training and awareness-raising programs were delivered for all Roberts Co staff;
- (2) 100% of complaints were resolved by a grievance mechanism;
- (3) All contracts have been updated to include modern slavery clauses:
- (4) Actions have been taken to work with high-risk suppliers to improve their capacity to respond to modern slavery risks; and

(5) All employment contracts have been updated to include modern slavery clauses.

Unsafe workplaces that impact worker rights can reflect modern slavery risk. We are committed to protecting the health and safety of all workers on our sites, including both our own employees and representatives of subcontractors and other staff. Protecting worker rights is a further means by which we manage modern slavery risk.



# How we assess the effectiveness of our actions

Our approach to assessing the effectiveness of our program is underpinned by progressing a number of goals that we set for ourselves each year and setting new goals for the next reporting period.

Our work in this area is overseen by the CEO and the Board. As part of our ongoing efforts, we have expanded our metrics for assessing the effectiveness of our actions to include the following goals for FY25:



Introduce refresher training for Modern slavery awareness to all company staff



Continue to resolve 100% of complaints via the grievance mechanism



Continue to work with high-risk suppliers to improve their capacity to respond to modern slavery risks

# **Process of consultation**

All of the reporting entities share Directors and report to the same executive team.

By its nature, the assessment and management of modern slavery risk requires the involvement of representatives of the commercial, procurement, finance, legal, IT, and human resources teams, as well as the oversight of management. The individuals involved in the preparation of this statement were consulted in relation to all of the reporting entities. These entities do not otherwise have owned or controlled entities that require consultation to prepare this statement. This statement reflects the work undertaken during the year of representatives of all of these teams within Roberts Co.

Roberts Co will continue to engage in discussions with all stakeholders regarding modern slavery risks at future Board meetings. Roberts Co seeks the cooperation of all workers, suppliers and other parties working with our business. Roberts Co encourage suggestions for realising our modern slavery, equal opportunity and anti-discrimination objectives to create a safe, fair and tolerant working environment.



# **Approval**

This statement for the financial year ending 30 June 2024 is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) and has been approved by the Board of Roberts Co Australia Pty Ltd, and its subsidiaries on 13 December 2024. This statement is signed by a responsible member of the Board of Roberts Co Australia Pty Ltd, the higher entity, as defined by the Act.

Signed,

Matt Bourne

**Chief Executive Officer** 

13/12/2024



# **Statement Annexure**

Mandatory criteria	Page number/s
Identify the reporting entity	2
Describe the reporting entity's structure, operations and supply chains.	2, 3, 4, 5, 6, 7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	8,9
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	10, 11
Describe how the reporting entity assesses the effectiveness of these actions.	12
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	13

# **Annexure A**

- Health and Safety Policy
- Environmental Policy
- Quality Policy
- Drug and Alcohol Policy
- Return to Work Policy
- Industrial Relation Policy
- Modern Slavery Policy
- Whistleblower Policy

