
Modern Slavery Statement

2022/23

Version 4.0



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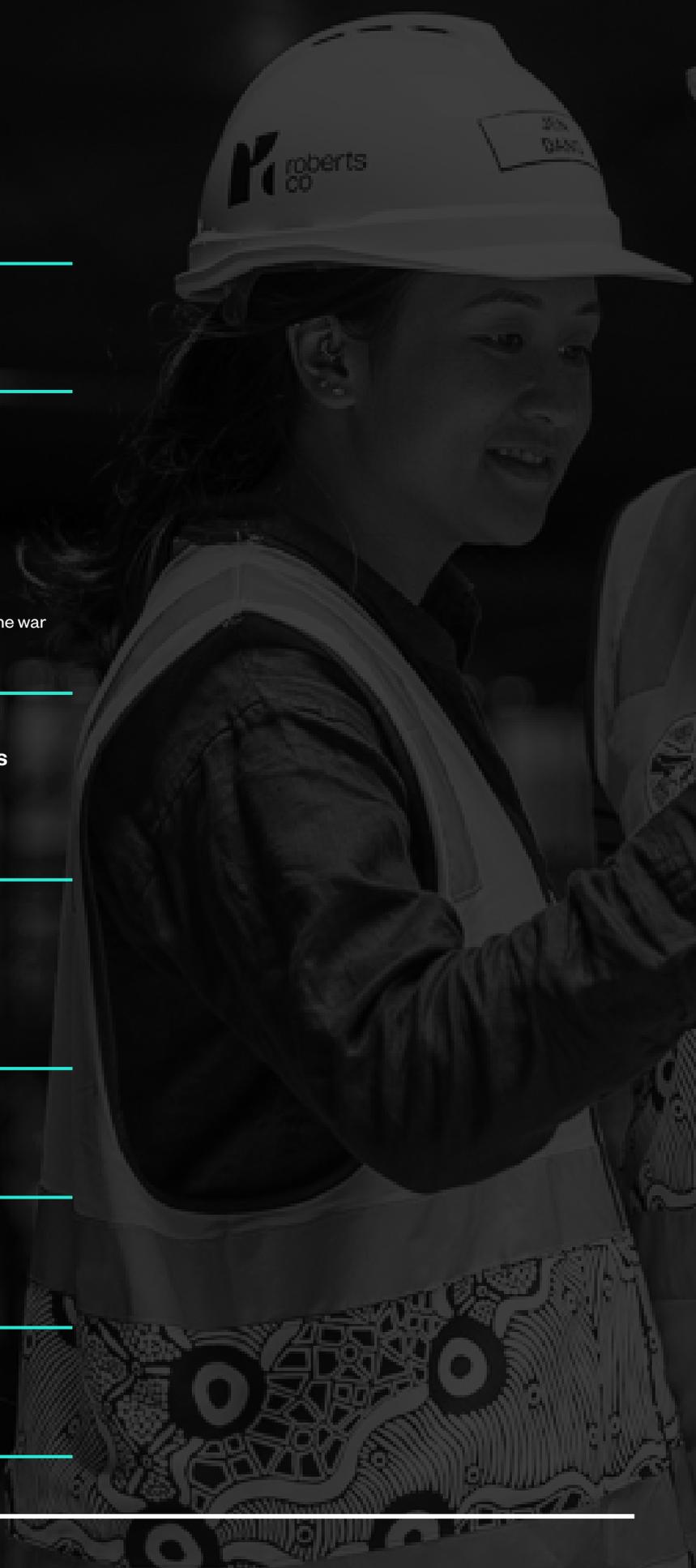
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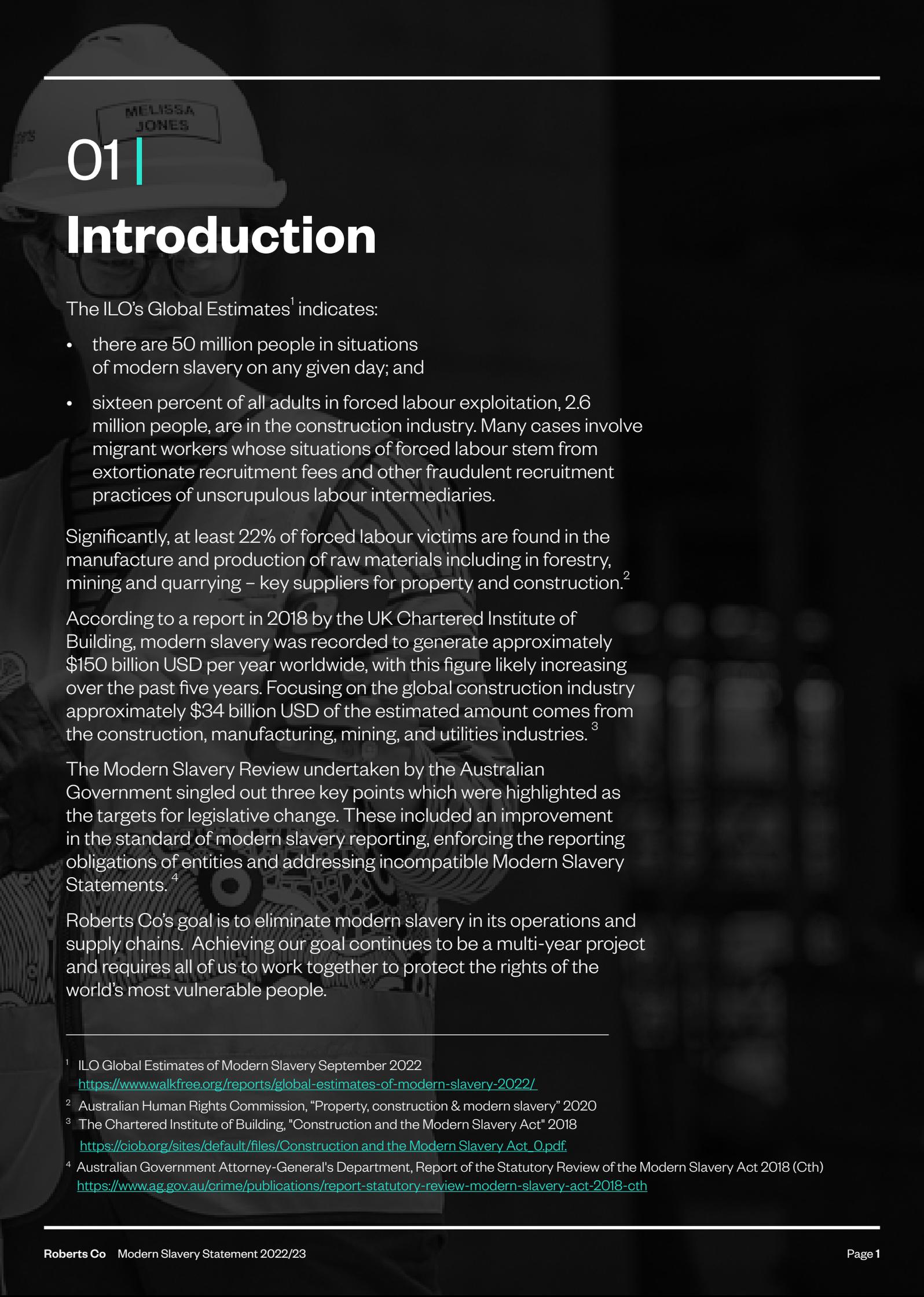
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01 |

Introduction

The ILO's Global Estimates¹ 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.²

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.³

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.⁴

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.

¹ ILO Global Estimates of Modern Slavery September 2022

<https://www.walkfree.org/reports/global-estimates-of-modern-slavery-2022/>

² Australian Human Rights Commission, "Property, construction & modern slavery" 2020

³ The Chartered Institute of Building, "Construction and the Modern Slavery Act" 2018

[https://ciob.org/sites/default/files/Construction and the Modern Slavery Act_O.pdf](https://ciob.org/sites/default/files/Construction%20and%20the%20Modern%20Slavery%20Act%20O.pdf)

⁴ 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>

02 |

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 2023 (FY23) 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 in 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 which is 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 Origination



2.0 Project delivery & design



3.0 Finance, HR, legal, IT and insurance

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.

In April of this year, Roberts Co (VIC) Pty Ltd trading as Monaco Hickey commenced the process of novating five Victorian projects under construction that had been the subject of the external administration of Lloyd Group, who went into administration on March 31st 2023. The novation of the projects also facilitated the transfer of 20 Lloyd Group project delivery staff to the Monaco Hickey business in parallel, with their formal employment commencing with Monaco Hickey at the end of April, and the last of the project novation executions taking place in early June.

In the novation process, all existing sub-contractors and their subcontract agreements were transferred to Monaco Hickey/ Roberts Co, and all un-processed progress claims were reviewed, assessed, and paid, as part of the re-engagement and mobilisation process to get the project works back underway.

Our operations

During FY23, Roberts Co employed 313 personnel and had twelve active projects across NSW and Victoria. A breakdown of our personnel by employment type is set out below:

	NSW	Vic
Staff Total	92	124
Construction Worker	29	53
Trainees & Apprentices	5	0
Contractors	1	5
Female (staff)	29%	24%
Female (overall)	32%	18%

Construction, processing and production

As a tier 1 contractor, Roberts Co delivered work for both private and government clients within NSW and Victoria, inclusive of commercial, education, residential, health, pharma and hospitality. 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 FY 23.

Our projects

During the FY23, we worked on 12 key projects across NSW and Victoria. Those projects were:



01

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.



04

CSL Melbourne

The facility consists of 16 levels including 7 levels of office fit out and 9 levels of laboratories, consisting of commercial office space, conference facilities, common facilities, cleanrooms and laboratories. The fit out was integrated with the base build at Elizabeth North Stage 2.



02

Moxy Sydney Airport Hotel

The construction of a proposed new 13-storey hotel comprising of 301 hotel rooms; reception, lounge/ waiting area, café, library, restaurant and back of house services on the ground floor.



05

500 Bourke Street

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



03

Elizabeth North Stage 2

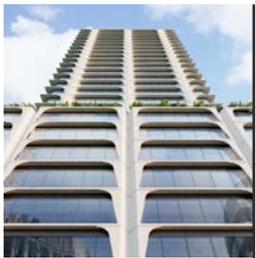
Stage 2 comprises a 16-storey building that will accommodate collaboration between academic institutions and industry, supporting and advancing Melbourne’s position as a centre for research, development and innovation.



06

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.



07

130 Little Collins Street

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



10

Indi Footscray

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.



08

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



11

Wentworth Point High School

A six-storey senior school including science, visual arts, performance, fitness, wood/metal, food technology, a library, administration, staff areas, student services, a canteen, outdoor covered workshop and a quadrangle.



09

Oasis Residences

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



12

Children's Hospital Westmead - Paediatric Services Building

A paediatric hospital consisting of a surgical short stay unit; perioperative services; PICU; NICU; oncology inpatient units and family retreat areas; day oncology, medical, and surgical inpatient units; family accommodation; parking; loading dock, back of house and logistics facilities; landscaping.

The impact of COVID-19

We have continued to be mindful of the potential impact of COVID-19 and the Russia-Ukraine War on our business, supply chains and our community this year.

As the impacts of the pandemic continues to be felt across the world, we have continued to assess and monitor our supply chains, being conscious of the increased number of vulnerable workers who may be at risk of being exploited. As construction and investment in infrastructure picks up pace, the vulnerability of these worker groups may be exacerbated, as people choose work, irrespective of conditions.

As part of our awareness of the need to assist our subcontractors during periods of shutdown, we continued payment throughout those periods. We are conscious of the impact that unexpected periods of non-payment can have on smaller subcontractors and their employees.

The impact of the Russia-Ukraine War

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. Uncertainty has also affected the markets relating to metals produced in Russia which are crucial in manufacturing, including aluminium, nickel, palladium and vanadium.

This has been made evident in the prices of aluminium and copper which reached a 10-year high in early 2022. 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.



Our supply chain

In FY23, Roberts Co’s procurement spend was approximately \$470m which was an increase of \$268m from the previous financial year. The main categories of spend from our project teams and finance, HR, legal, IT and insurance 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

- Steel*
- 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
- Insurance broker and insurance 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.

03 |

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.

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.⁹ These figures have increased since 2021, with construction and manufacturing being identified as high-risk sectors.¹⁰ 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 88% of non-managerial employees are covered by enterprise or industrial agreements.
- ✓ Our employee on-boarding processes include working rights employment checks managed by our Human Resources group.
- ✓ 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.

⁹ Walk Free 2023, The Global Slavery Index 2023, <https://walkfree.org/global-slavery-index/>

¹⁰ Walk Free 2023, Modern Slavery What Business Needs to Know 2023, https://cdn.walkfree.org/content/uploads/2020/10/06154702/M1170847-Toolkit-Primer_DIGITAL.pdf

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 FY23, 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
- Concrete
- PVC 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 state-sponsored 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.

¹¹ <https://www.shu.ac.uk/helena-kennedy-centre-international-justice/research-and-projects/all-projects/built-on-repression>

04 |

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.

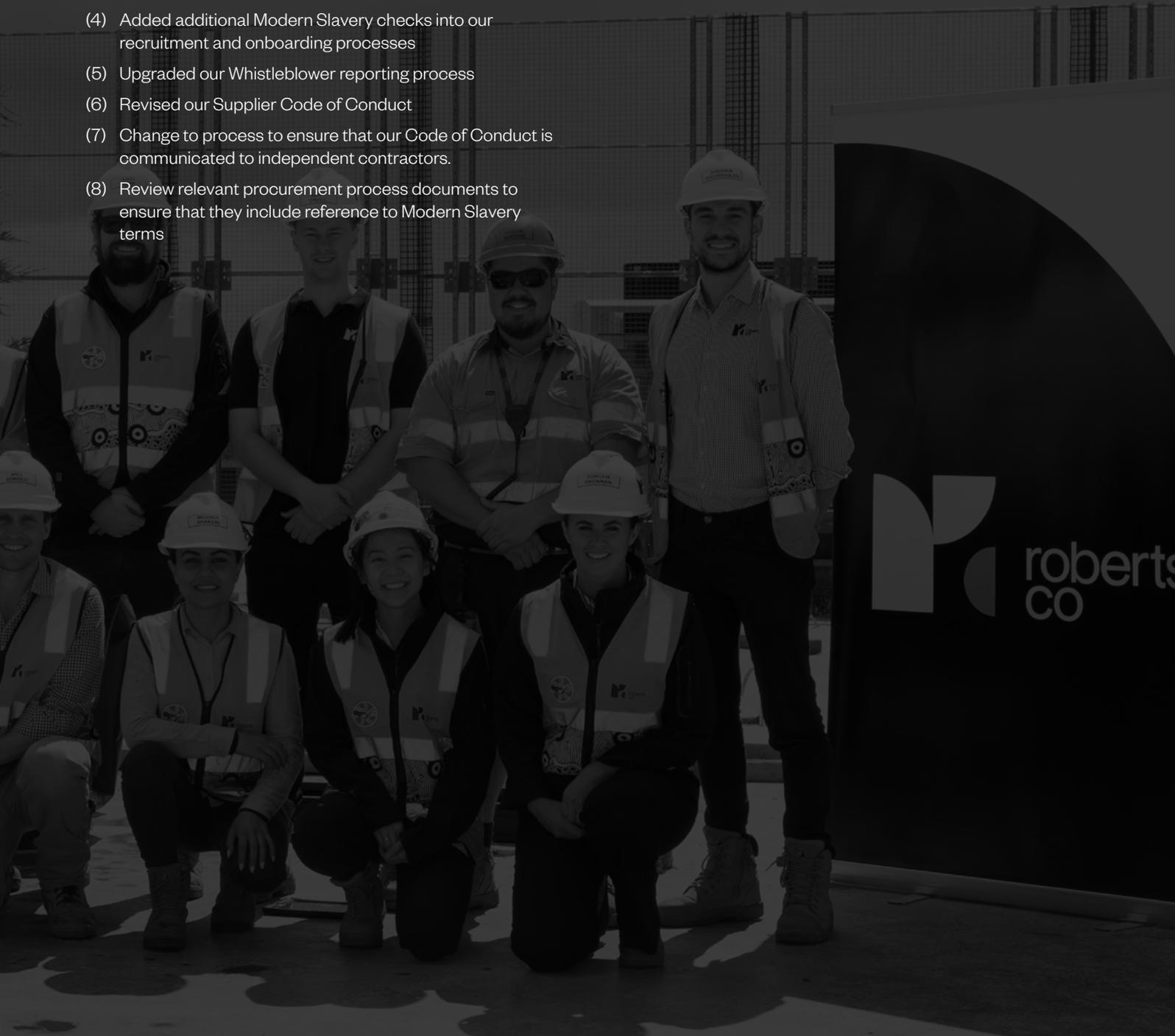
04 | Actions

Our work during FY23 built upon the goals set out in our FY22 statement. Our existing policies and procedures are described in Annexure A.

We progressed most of the goals that we set for ourselves in our FY22 statement to ensure that our approach to assessing and addressing modern slavery risks remains effective. In summary, the actions we have taken in FY23 are set out below:

- (1) Continued to monitor whistleblower reports for trends relevant to modern slavery.
- (2) Reviewed the company Modern Slavery policy
- (3) Reviewed the company Whistleblower policy
- (4) Added additional Modern Slavery checks into our recruitment and onboarding processes
- (5) Upgraded our Whistleblower reporting process
- (6) Revised our Supplier Code of Conduct
- (7) Change to process to ensure that our Code of Conduct is communicated to independent contractors.
- (8) Review relevant procurement process documents to ensure that they include reference to Modern Slavery terms

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.



05 |

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 FY24:



Modern slavery training and awareness-raising programs delivered for all company staff



100% of complaints resolved by a grievance mechanism



All contracts include modern slavery clauses



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

06 |

Process of consultation

By its nature, the assessment and management of modern slavery risk requires the involvement of representatives of the commercial, procurement, finance, legal and IT (including 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 co-operation 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 2023 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 04/12/2023. 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
CEO
04/12/2023



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

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