



INTREC

Modern Slavery Statement

2024 - 2025

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QLD 4064

ACT

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Canberra ACT
2601

Regional NSW

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Ave, Bathurst,
NSW 2795



**“Our Difference
is our People”**

INTREC Management

There are seven mandatory reporting criteria required by the Modern Slavery Act 2018 (Cth):

01	Identify the reporting entity	04
02	Describe the reporting entity's structure, operations and supply chains	05
03	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	08
04	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	09
05	Describe how the reporting entity assesses the effectiveness of these actions	10
06	Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls with any entities the reporting entity owns or controls	11
07	Any other relevant information	11

REGISTER FOR REVIEW

Revision	Date	Description of Amendments	Amended By
01	03/09/2019	Document created	CB
02	31/08/2021	Reviewed & updated to meet ABS criteria	BF
03	19/09/2022	Updated to reflect staff changes	MZ
04	19/12/2023	Reviewed & updated to reflect staff changes	LR
05	08/11/2024	Reviewed & updated to reflect staff changes and policy updates	LR



We pay respect to the Cammeraygal People of the Eora Nation, the Jagera people of Turrbal and the Boon Wurrung and Woiwurrung (Wurundjeri) peoples of the Kulin Nation; of the lands on which our company is located and conducts business. Through our endorsed Reconciliation Action Plan (Reflect), we recognise the important roles Aboriginal and Torres Strait Islander peoples perform in our business.

01

Reporting Entity

We respect the principle of non-discrimination as a fundamental one in human rights law - all human rights should be enjoyed by everyone regardless of factors such as race, sex or disability.

INTREC acknowledges our moral, ethical and legal obligations to combat slavery, forced and compulsory labour and human trafficking as defined by the Commonwealth Modern Slavery Act 2018 and more broadly the Australian Human Rights Commission Act 1986 and our specific obligations under the Racial Discrimination Act, the Sex Discrimination Act, the Disability Discrimination Act and the Age Discrimination Act.

To this end, we have implemented a Modern Slavery policy (**refer INTREC Policy 27**) and taken steps to improve transparency in our supply chains through our engagement with suppliers and subcontractors.

Implementation of our obligations is managed through:



Clear and unambiguous policies to support the abolition of modern slavery.



Training, awareness and ongoing review.



Prequalification of suppliers and subcontractors who have aligned values and systems of work to INTREC.



02.1

Structure, Operations & Supply Chains

INTREC is a privately-owned Australian company, specialising in construction, commercial fitouts and building refurbishment. With our resources and expertise, we deliver projects up to \$50m with successful outcomes to our varied and valued Client base.



Over 160 employees across Australia

Founded in 1996, INTREC has established a reputation for outstanding service, quality and reliability.

Our professional team are highly motivated and committed to delivering projects to the highest standard possible. Our extensive experience includes all aspects of the building process and working under all forms of contract.

We have experience in all forms of project delivery, including Lump Sum, Early Contractor Involvement, Design & Construct, Construction Management, Cost Plus and Guaranteed Maximum Price methods.

We are focused on understanding our Client's needs and the key project deliverables. We aim to achieve excellent Client satisfaction through the implementation of our 'best practice' systems, which are certified to the following standards:

- ISO 9001:2015 – for our Quality Management Systems
- ISO 14001:2015 – for our Environmental Management Systems
- ISO 45001:2018 – for our Occupational Health & Safety Systems

In addition, INTREC meets the National Code of Practice for the Construction Industry for Federally funded projects. We are also a member of the Green Building Council of Australia and have completed several 4+ and 5+ Green Star Projects.

We have built, developed and maintained many long-standing relationships with numerous Clients nation-wide, which is a testimony to our professional capabilities in interior refurbishment and construction projects.



Founded in 1996, INTREC has been operating for over 26 years

Our key focus is developing a comprehensive understanding of our Client's needs, as well as deliver value and excellence in every aspect of our service. We seek to build long-lasting partnerships with our Clients, staff and suppliers.

INTREC is currently delivering projects throughout the Eastern Seaboard through its offices in Sydney, Brisbane, Melbourne and Canberra.



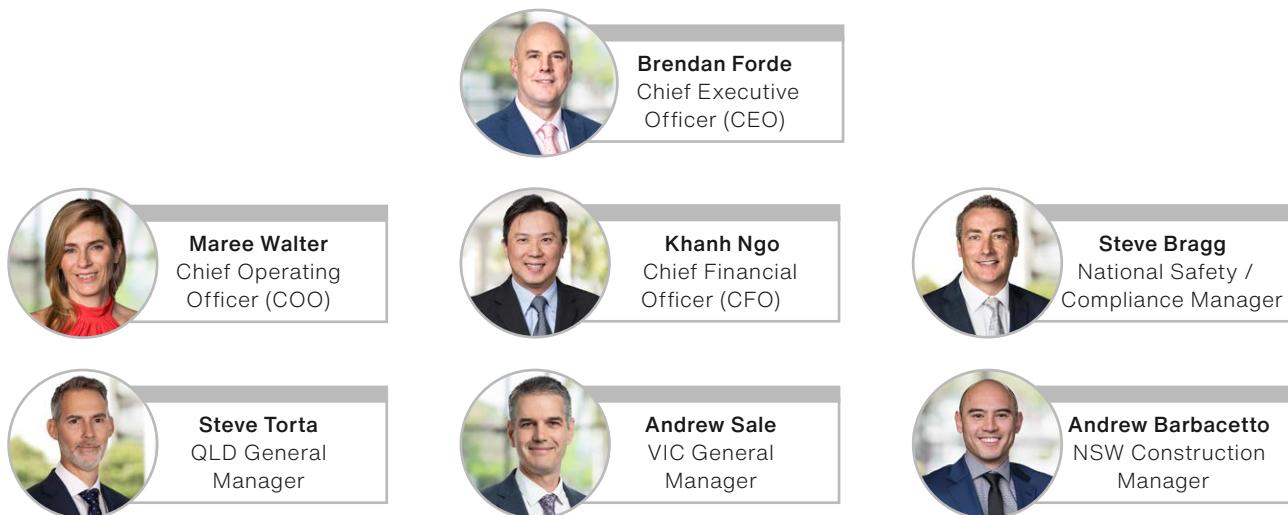
Delivering projects up to \$50 million



Operating in 4 regions, New South Wales, Victoria, Queensland & Australian Capital Territory

02.2

Our Business Structure



NSW PROCUREMENT

Client Relations
Estimators
Bid Coordinators

NSW PROJECTS

Construction Manager
Services Manager
Project Managers
Site Manager
Site Supervisors
Contracts Administrators
Construction Cadets

VIC PROCUREMENT

Client Relations
Estimators
Bid Coordinators

VIC PROJECTS

Construction Manager
Services Manager
Project Managers
Site Manager
Site Supervisors
Contracts Administrators
Construction Cadets

QLD PROCUREMENT

Client Relations
Estimators
Bid Coordinators

QLD PROJECTS

Construction Manager
Services Manager
Project Managers
Site Manager
Site Supervisors
Contracts Administrators
Construction Cadets

SUPPORT

Finance
Compliance
IT & COMMS
Training
Recruitment
Marketing

02.3

Our Supply Chain

INTREC work in a collaborative, transparent manner and dedicate the necessary resources to ensuring communication channels will be established and maintained with our supply chain of sub-contractors, service providers and material suppliers.

We receive services across multiple procurement categories including and not limited to the following:

- Preliminaries
- Consultants & Surveyors
- Demolition
- Asbestos
- Excavation
- Concrete & Formwork
- Masonry
- Waterproofing
- Steel & Metalwork
- Roofing
- Cladding / Facades
- Windows
- Doors
- Wall & Ceiling Lining
- Carpentry & Joinery
- Rendering
- Tiling & Floor Coverings
- Painting & Graphics
- Hydraulics (Plumbing)
Security
- Electrical
- Lifts
- Fire
- Furniture & Fixtures
- External Works
- Cleaning

INTREC have established an extensive base of long serving subcontractors and suppliers in alignment with our social responsibility practices, both local and all across Australia.



03

Risks of Modern Slavery Practices

INTREC has a clear position that we and our suppliers and subcontractors will not engage in behaviour which supports, encourages or allows slavery, forced or compulsory labour or human trafficking.

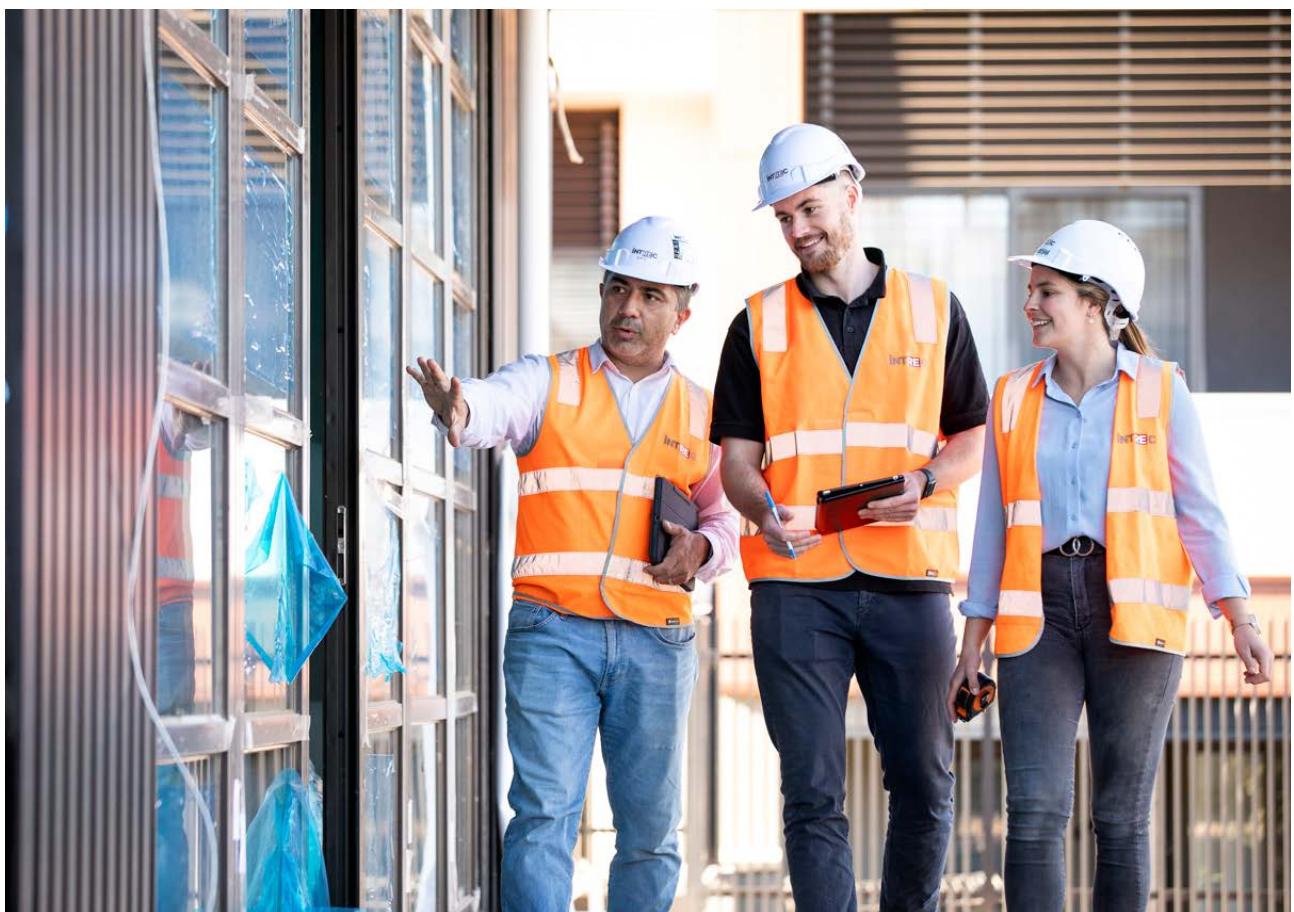
INTREC's primary source of risk resides in our multi-layered supply chain of labour, suppliers and subcontractors. The complexity can result in lack of visibility of employment practices that don't comply with legislative obligations. Services such as cleaning and security identify as high risk modern slavery industries.

Despite the complex construction supply chain, INTREC ensure all suppliers and subcontractors are prequalified to ensure alignment with our Code of Conduct ([refer to INTREC Procedure 30: Code of Conduct and Procedure 45: Subcontractor and Consultant Selection](#)).

All subcontractor employees are required to be inducted prior to working on INTREC sites. This induction takes into account the needs and obligations of INTREC and those of INTREC's clients. This induction process includes mandatory review and adherence to the subcontractor employee holding the appropriate tickets, licenses and trade memberships for the jurisdiction in which the work is being undertaken and in accordance with INTREC's Safety and Environmental Management Plan.

INTREC respects the rights of freedom association for subcontractor employees and will ensure that we uphold our statutory obligations in relation to Right of Entry and the rights of the individual employees.

Other areas of risk include Product and service risk, Geographic Risk and Entity Risk.



04

Actions to Assess and Address Risk

INTREC projects are delivered through the use of subcontract labour which is where our primary source of risk resides. The success of INTREC is contingent on the relationship with and quality of our suppliers & subcontractors.

We ensure compliance through the use of specific Modern Slavery contractual terms in our engagement agreements and in formal and informal reviews with key suppliers and contractors. We conduct a risk assessment each project taking into account exposure to modern slavery and where appropriate, apply formal processes to ensure we do not allow exposure.

Our Due Diligence Actions:

- Conducting an independent risk assessment to ensure compliance with all applicable modern slavery laws and take steps to meet standards in relation to modern slavery.
- Using a modern slavery questionnaire at subcontractor selection and inductions.
- Request the right to audit our subcontractors for compliance.

The primary evaluation factors are:

1. Alignment with the INTREC Code of Conduct
2. Employee training and development
3. Technical competency
4. Safety
5. Quality
6. Organisational alignment and management (of the subcontractor) and relationship management

In addition, INTREC has a **Whistle-blower Policy (refer to INTREC Policy 22)** to support the awareness, reporting and remediation of activities which may be contrary to the behaviours defined in our policies and procedures.

At pre-employment for both sub-contractors and full-time employees, INTREC focuses on two primary components being cultural fit and technical (functional) competence. Cultural fit and alignment of personal values are the strongest indicator of potential success for the employee in INTREC and will have the greatest favourable impact on the success of INTREC. At commencement of employment, all INTREC employees are subject to a mandatory induction which details all company policies and procedures. Online testing is then conducted to measure understanding of company policies and procedures.

During employment, all employees are required to undertake mandatory online refresher training on a six monthly or annual basis in relation to application of policies and procedures. Management review is undertaken monthly on a rolling basis to ensure that policies are current and reflect our broader obligations and the needs of our employees, subcontractors and INTREC.



05

Effectiveness of these Actions

CONTINUOUS AWARENESS AND DISCOVERY

We will identify and mitigate risk by:

- Identifying and assessing potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistleblowers.
- Where appropriate, undertake audit and review of individuals and entities who are deemed to present a risk to our business in relation to modern slavery.

OUR CONTROLS

All INTREC Projects operate under the framework of a **Project Specific Management Plan** which assesses specific items of risk and risk mitigation.

Minimum Wage Requirements – as detailed above, all INTREC Policies and Procedures are available for review on request. INTREC employees are engaged on individual contracts of employment which reflect (as an absolute minimum) our obligations as imposed by the National Employment Standards and the Fair Work Act in addition to State based statutory obligations.

All INTREC employees undertake role specific training (based on a verification of competency model) in addition to periodic formal reviews which include an individual learning and development plan. Sample employment contracts, reviews and learning and development plans are available on request.

INTREC suppliers and subcontractors are engaged on a formal agreement which requires compliance with statutory obligations in relation to employment standards safety and human rights.

We measure and monitor feedback and complaints through the INTREC Whistleblower process and undertake risk-based audits as required.

ASSESSING EFFECTIVENESS

We assess risk by sector on a project basis:

Sector risk	Commercial Construction (Subcontractor Engagement)
Product and service risk	Building Products (country of origin clarification).
Geographic Risk	Operations in New South Wales, ACT, Victoria and Queensland.
Entity Risk	INTREC and INTREC Clients.

We continue to undertake training of all employees in the application of INTREC policies and procedures including our obligations in relation to modern slavery.

We continue to induct all new employees to ensure awareness of the application of INTREC policies and procedures including our obligations in relation to modern slavery.

We communicate and engage with suppliers and subcontractors by way of project reviews to ensure awareness of the application of INTREC policies and procedures including our obligations in relation to modern slavery.

We require a Modern Slavery Compliance obligation in our subcontract agreements.

We undertake incident reviews for each occurrence in relation to potential or actual breach of our obligations in relation to modern slavery.

06

Process of consultation

INTREC include a review of our Modern Slavery obligations in our third party surveillance audit process annually.

We also report twice per year to our Directors and Management Board in relation to status of our programmes and initiatives to improve our performance. Reporting performance measures include:

- Modern slavery awareness module completed on Litmos as % of employees
- Number of complaints received through our Whistleblower process
- Number of subcontracts let which require modern slavery obligations to be met and
- Satisfactory audit completion in the reporting period



07

Other relevant information

NEXT STEPS

INTREC will continually review and audit our due diligence process, ensuring our policy is updated annually with any potential and future changes that may arise.

Our Management team will continue to educate our internal and external team of our policies and any improvements necessary. It is important for us to continually identify any risks that may not have occurred yet and ensure these are covered in our due diligence and remediation process.

This statement was approved by the board of INTREC Management in their capacity as principal governing body of INTREC Management Pty Ltd on 30 August 2024.

This statement is approved and signed by Brendan Forde in his role as the CEO of INTREC Management on 08 November 2024.

Brendan Forde

Managing Director of
INTREC Management Pty Ltd
08 November 2024

Appendix A

Policies (POL) &
Procedures (PROC)

Appendix A

Policies & Procedures

POL27: Modern Slavery Policy



Modern Slavery Policy

Policy Statement

Modern slavery is a violation of human rights. Modern Slavery takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking, all of which can lead to the deprivation of individual freedom. INTREC is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place within INTREC and in our supply chains.

We are committed to ensuring there is transparency in our own business and in our approach to addressing modern slavery throughout our supply chains, consistent with our obligations under the Commonwealth Modern Slavery Act 2018. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our subcontractor and supplier engagement processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our subcontractors, suppliers and business partners will hold their own suppliers to the same high standards.

All INTREC employees must comply with this policy and ensure that it is brought to the attention of our suppliers, subcontractors and business partners.

Non-compliance with this policy will result in disciplinary action in accordance with INTREC policies and procedures. Serious breaches may amount to gross misconduct resulting in dismissal. If appropriate, information may be handed to the police in connection with a criminal investigation. We may terminate our relationship with other individuals and organisations working on our behalf or who are engaged by us if they breach this policy.

The Directors of INTREC have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The INTREC Management Team has primary and operational responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains. As an INTREC employee, you must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

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Policies & Procedures

POL27: Modern Slavery Policy



If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager as soon as practicable. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains contravenes this policy, raise it with your manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Training on this policy, and on the risk our business faces from modern slavery in our supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our expectations in relation to modern slavery must be communicated to all suppliers, subcontractors and business partners as appropriate at the outset of our business relationship with them and reinforced as appropriate thereafter.

A handwritten signature in black ink, appearing to read "Brendan Forde".

Director – Brendan Forde

Date: 08/07/2024

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Policies & Procedures

PROC30: Code of Conduct

INTREC Management Pty Ltd // INTREC Mgmt.(NSW) Pty Ltd // INTREC Mgmt.(QLD) Pty Ltd //
INTREC Mgmt.(VIC) Pty Ltd // Balance Mechanical Services Pty Ltd



030 Procedure - Code of Conduct

REGISTER OF REVIEW			
REVISION	DATE	DESCRIPTION OF AMENDMENTS	AMENDED BY
4.0	15/08/2018		
	10/08/2021	Annual Review Completed	SB/JA
	17/04/2023	Annual Review Completed	SB
	08/07/2024	Annual Review Completed	SB

1. Purpose

Staff and subcontractors will abide by these business guidelines

2. Scope

The code of conduct applies to all staff and subcontractors

3. Responsibilities

WHO	RESPONSIBLE FOR
Staff	Adherence to Procedure
Subcontractors	Adherence to Procedure

4. Procedure

4.1 Step One

- Always be loyal to IM and Balance Mechanical ideals, business and strategic plan.
- Be frank, honest, and thorough in your endeavours.
- Be fair, impartial and polite in dealing with clients, subcontractors the public and other staff members.
- Be committed to the continuous improvement of IM and Balance Mechanical Services.
- Be accountable for your actions when representing IM and Balance Mechanical.
- Strive for innovation in service delivery and product design.
- Perform your duties and reasonable given instructions with skill, care, honesty and diligence.
- Comply with relevant laws, regulations, determinations, awards, policies and procedures in the execution of your duties.

Staff/Subcontractor
s

4.2 Step Two

- Deal with clients, other subcontractors and the community courteously, honestly, equally, impartially and in a way sensitive to their rights.
- Use company resources only for IM and Balance Mechanical business purposes unless approved in writing by directors.
- Disclose conflict of interest immediately it becomes apparent. This issue will be addressed in subcontractor agreements.
- Conduct yourself in a way which enhances the image and reputation of IM and Balance Mechanical.
- Provide constructive feedback when consulted about IM and Balance Mechanical policy, procedures and strategic directions.
- Comply with OHS statutes/laws/requirements.

Staff/Subcontractor
s

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PROC30: Code of Conduct

INTREC Management Pty Ltd // INTREC Mgmt.(NSW) Pty Ltd // INTREC Mgmt.(QLD) Pty Ltd //
INTREC Mgmt.(VIC) Pty Ltd // Balance Mechanical Services Pty Ltd



030 Procedure - Code of Conduct

- Comply with environmental statutes/laws/requirements.
- Comply with IM and Balance Mechanical quality system policy and procedures.

4.3 Step Three

- Staff and subcontractors are reminded that IM and Balance Mechanical directors may review email use and website access facilitated via the company's accounts where access is being utilised for private use.
- Don't report for work under the influence of alcohol or drugs (0.0ml).
- Don't engage in practices that include bribery or corruption.
- Employees of Intrec represent the organisation and therefore are representatives of Intrec's professional interests and, as such, are not to engage in aggressive behaviours towards internal and external personnel, stakeholders, competitors, or the general public.
- Advise IM and Balance Mechanical when you are taking prescribed medication that may affect the performance of your duties, including driving motor vehicles.
- Do not perform work for a competitor company (if a full-time employee of IM)

Staff/Subcontractors

Further Actions

- Provide code to all staff at induction and display on noticeboard.
- Review code at least every three years.
- Modified code circulated to senior staff and subcontractors for feedback before release.

5. Training

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6. References

DESCRIPTION	WEB LINK TO REGULATORY AUTHORITY INFORMATION

7. Forms/Procedures/Records

7.1 Forms

RECORD	FORM No.	RESPONSIBILITY	RETENTION PERIOD
Employment Contract	QT26		

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PROC30: Code of Conduct

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INTREC Mgmt.(VIC) Pty Ltd // Balance Mechanical Services Pty Ltd



030 Procedure - Code of Conduct

7.2 Procedures

RECORD	RESPONSIBILITY	RETENTION PERIOD
026 Procedure - Staff Performance Review		7 years
027 Procedure - Inappropriate Behaviour Misconduct		7 years
029 Procedure - Confidentiality		7 years
030 Procedure - Code of Conduct		7 years
061 Procedure - Computer Usage Policy		7 years

8. Definitions

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Policies & Procedures

PROC45: Subcontractor & Consultant Selection

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INTREC Mgmt.(VIC) Pty Ltd // Balance Mechanical Services Pty Ltd



045 Procedure – Subcontractor and Consultant Selection (Inc. Tending)

REGISTER OF REVIEW			
REVISION	DATE	DESCRIPTION OF AMENDMENTS	AMENDED BY
6.0	29/04/2021		
	12/08/2021	Annual Review Completed	SB/JA
	19/04/2023	Annual Review Completed	SB
	08/07/2024	Annual Review Completed	SB

1. Purpose

- INTREC Management (IM) and Balance Mechanical may call open or select tenders or seek expressions of interest for the provision of products or services to meet the needs of its clients
- IM will consider a range of non-price and price factors in the subcontractor evaluation which will include the applicant's quality, OHS, environmental and risk management processes, financial stability, historical safety performance, resource capacity, technical capability and alignment with the intent of the project deliverables as part of the assessment process.

Scope

During the tendering process/stage

2. Responsibilities

WHO	RESPONSIBLE FOR
State Manager	<ul style="list-style-type: none"> – Review of selection and criteria used
Delegated Representatives (Construction Managers, Contract Administrators & Project Manager)	<ul style="list-style-type: none"> – consider a range of non-price and price factors in the subcontractor evaluation which will include the applicant's quality, OHS, environmental and risk management processes, financial stability, historical safety performance, resource capacity, technical capability, and alignment with the intent of the project deliverables as part of the assessment process.

3. Procedure

3.1 Step One

- Preparation of a specification that best describes the service requirements of IM.
- Set criteria against which applications can be rated and ranked. This should refer to the client's specifications. This may include project specific requirements.
- Decide the process to be used for reviewing tender/quotation responses.
- Advise current preferred subcontractors of the tender process and available projects.
- Direct electronic invitations via 'Estimate One', 'Email' or call selected suitably qualified subcontractors and/or advertise the opportunity in the appropriate media.
- Distribute criteria and specification to enquirers. This should include specific qualification requirements, e.g., certifiers.

Construction Manager/Estimator

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PROC45: Subcontractor & Consultant Selection

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INTREC Mgmt.(VIC) Pty Ltd // Balance Mechanical Services Pty Ltd



045 Procedure – Subcontractor and Consultant Selection (Inc. Tending)

3.2 Step Two

- Short-list applicants based on compliance with selection criteria and pre-determined price parameters.
- Interview applicants and undertake reference check, including verifying any specific qualification requirements.
- Provide a subcontractor's registration agreement and specification to successful applicant for comments execution including fee schedule quality assurance and WHS obligations and key performance indicators.
- Respond to queries relating to the contract. Resolve issues and obtain signature from authorised person.
- Establish the necessary supporting infrastructure prior to the commencement of the contract (where required).
- Establish reporting schedules for subcontractors and specify required format.
- Ensure up to date certificates of currency are on file for subcontractor insurances, workers compensation, relevant licences, and other statutory requirements.
- Induct the subcontractor(s) to the IM site, quality and WHS system and any requirements, as applicable.
- Measure, monitor and communicate status of key project deliverables and project improvement and / or project programme acceleration as required as part of a structured corrective action process.
- Resolve delays in service provision caused by subcontractors.
- Regular subcontractors to complete subcontractor registration and obtain all relevant conditional documentation.

Construction
Managers/Estimator
/Contract
Administrators/
Project Manager

3.3 Step Three

- Ensure up to date certificates of currency are on file for subcontractor insurances, workers compensation, relevant licences, and other statutory requirements.
- Induct the subcontractor(s) to the IM site, quality and WHS system and any requirements, as applicable.
- Measure, monitor and communicate status of key project deliverables and project improvement and / or project programme acceleration as required as part of a structured corrective action process.
- Resolve delays in service provision caused by subcontractors.
- Regular subcontractors to complete subcontractor registration and obtain all relevant conditional documentation.
- Advise unsuccessful applicants of your decision.
- Monitor complaints about the service of individual subcontractors.
- Review subcontractor's outputs pricing and key performance indicators to contract requirements each month.
- Check adherence to quality assurance WHS quarterly and environmental management requirements each month.
- Formally notify the subcontractors of deficiencies and agreed schedule for rectification.

Construction
Managers/Estimator
/Contract
Administrators/
Project Manager

4. Training

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PROC45: Subcontractor & Consultant Selection

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INTREC Mgmt.(VIC) Pty Ltd // Balance Mechanical Services Pty Ltd



045 Procedure – Subcontractor and Consultant Selection (Inc. Tendring)

5. References

DESCRIPTION	WEB LINK TO REGULATORY AUTHORITY INFORMATION

6. Forms/Procedures/Records

6.1 Forms

RECORD	FORM No.	RESPONSIBILITY	RETENTION PERIOD
Subcontractor Registration Pre-Qualification Kit	QT 07		
Subcontractor Registration Covering Letter			

6.2 Procedures

RECORD	RESPONSIBILITY	RETENTION PERIOD
047 Procedure - Job Enquiry Tender		7 years
049 Procedure - Tender Response Preparation (EOI or RFI)		7 years

7. Definitions

Appendix A

Policies & Procedures

Policy 22: Whistle-Blower Policy



Whistle-Blower Policy

Policy Statement

At Intrec we are guided by our company wide values. These values are the foundation of how we behave and interact with each other, our customers, suppliers, our shareholders, our subcontractors and broader stakeholders. Together our values reflect the priorities of the business and provide guidance in decision making. Our Code of Conduct and our Intrec policies have been developed to align with our values to ensure that we observe the highest standards of fair dealing, honesty and integrity in our business activities. Our Whistle-blower Policy (this "Policy") has been put in place to ensure employees and other workers can raise concerns regarding any serious wrongdoing (including unethical, illegal, corrupt or other inappropriate conduct) without being subject to victimisation, harassment or discriminatory treatment.

Purpose

This Policy aims to:

- Encourage Workers to report an issue if they genuinely believe someone has engaged in serious wrongdoing;
- Outline how Intrec will deal with all reports of serious wrongdoing; and
- Set out the mechanism to report serious wrongdoing to Intrec.

Whilst it is generally expected that these issues will be raised through the normal channels of line management, reporting by these alternate mechanisms may be appropriate or necessary in certain situations.

Scope

Intrec and Balance Mechanical's WHS Policy applies to employees, Directors, officers, contractors (including employees of contractors) suppliers and consultants.

Aims

Intrec and Balance Mechanical are committed to the following:

Matters that should be reported

Any matter that a Worker genuinely believes is in breach of Intrec's policies or the law should be reported in accordance with this Policy. Issues related to human resources and industrial relations are managed under separate mechanisms and policies and are excluded from this Policy.

Reportable matters include any conduct that involves:

- dishonest behaviour;
- fraudulent activity;
- unlawful, corrupt or irregular use of company funds or practices;
- illegal activities (including theft, dealing in or use of illicit drugs, violence or threatened violence and criminal damage against property);
- unethical behaviour, including anything that would breach the Intrec Code of Conduct;
- improper or misleading accounting or financial reporting practices;
- a breach of any legislation relating to Intrec's operations or activities
- behaviour that is oppressive, discriminatory or grossly negligent;
- an unsafe work-practice;
- any behaviour that poses a serious risk to the health and safety of any person at the workplace;
- a serious risk to public health, public safety or the environment; or
- any other conduct which may cause loss to Intrec or be otherwise detrimental to the interests of Intrec.

Appendix A

Policies & Procedures

Policy 22: Whistle-Blower Policy



Responsibility to report

We rely on our employees and business partners to help maintain and grow our culture of honest and ethical behaviour. It is expected that any employee who becomes aware of such conduct will make a report.

Protection of Whistle-blowers

A Worker making a report in good faith in accordance with this Policy (a "Whistle-blower") will not be discriminated against or disadvantaged in their employment or engagement with Intrec, even if the report is subsequently determined to be incorrect or not substantiated. All reasonable steps will be taken to ensure that a Whistle-blower will not be subject to any form of victimisation, discrimination, harassment, demotion, dismissal or prejudice, because they have made a report. However, this Policy will not protect the Whistle-blower if they are also involved in or connected to the improper conduct or illegal activities that are being reported.

Anonymous Reporting

A report can be made anonymously. However, it may be difficult for Intrec to properly investigate anonymous reports. If authorities take further legal action on the reported matter, it may become necessary for a Whistle-blower to identify themselves. If the Whistle-blower wishes to benefit from statutory protections provided to whistle-blowers (for example, under the Corporations Act 2001), they may also have to disclose their name. In these instances, Intrec will continue to ensure that the Whistle-blower is protected from retaliation.

Reporting in Good Faith

A report may have serious consequences, including potential damage to the career prospects and reputation of people who are the subject of allegations of wrongdoing. Therefore, it is very important that those who make a report under this Policy do so in good faith, with reasonable grounds for believing that the information is correct or likely to be correct. Intrec takes very seriously all reports made under this Policy and it looks particularly unfavorably on any false reports or claims. Disciplinary action may be taken against any employee who makes a report that is not in good faith. A report will not be considered to be made in good faith if it is frivolous, raised for a malicious reason or ulterior motive, or if it is not based on facts and/or circumstances that provide a reasonable basis for the report. Repeated reports about trivial matters may also be considered not to be made in good faith.

Resources

The Directors of Intrec govern and are responsible for the ultimate decision-making power regarding reports and investigations under this Policy. Whistle-blower Protection Officer ("WPO") Intrec has appointed a Whistle-blower Protection Officer (WPO) who will safeguard the interests of Workers making reports under this Policy and will ensure the integrity of the reporting mechanism. Reports under this Policy should be directed to the WPO. The WPO reports directly to the Directors. The WPO also has access to independent advisers as and when required. The current WPO is the Group Operations Manager.

Making a report

Internal Reporting

Employees may wish to first discuss the matter informally with their direct line manager or human resources advisor in order to determine whether serious misconduct has occurred. This is an opportunity to clarify the incident, ask questions and determine whether the matter comes under this Policy. At all times, these discussions will remain confidential. Reports made under this Policy should describe the grounds for the report and provide as much detail as possible of all relevant facts and supporting documentation (if any). Information contained in reports and provided by Whistle-blowers in the course of an investigation will be kept confidential, except as required by law or where disclosure is necessary to regulatory authorities, law enforcement agencies or professional advisors to Intrec.

Appendix A

Policies & Procedures

Policy 22: Whistle-Blower Policy



Reports concerning the Directors and WPO

If the report involves the Directors and / or the WPO, this will be directed to the Intrec Company External Auditor. In this instance, a Whistle-blower may make a report as per Section 8 'Making a Report' and include the instruction to refer the report directly to the External Auditor.

Investigating a report

Where a report is made in good faith about a matter that comes under this Policy, the report will be investigated. All investigations will be conducted in a fair and independent manner and all reasonable efforts will be made to preserve confidentiality of an investigation. To avoid jeopardizing an investigation, a Worker who has made a report under this Policy is required to keep confidential the fact that a report has been made (subject to any legal requirements).

Investigation feedback

Wherever possible, and assuming that the identity of the person making the report is known, the Whistle-blower will be kept informed of the progress and outcomes of the investigation, subject to privacy and confidentiality considerations.

Reports to other bodies

In certain circumstances a Worker may have a legal obligation to make a report to a statutory body or government department. Workers should ensure that they comply with all such reporting requirements. The WPO can advise Workers on these reporting obligations.

Breach of this Policy

Any breach of this Policy will be taken seriously and may result in counselling and/or disciplinary action, up to and including summary dismissal.

General

It is a condition of any employment or engagement that all Workers must comply at all times with this Policy. However, this Policy does not form part of any agreement between any person and Intrec, nor does it constitute terms and conditions of any person's employment or engagement with Intrec.

Responsibilities

Senior Management is accountable for the development, communication and implementation of this Policy to ensure a safe workplace.

Staff are to ensure they comply with the relevant building codes and Intrec and Balance Mechanical procedures regarding regulator and union representative access to site.

Policy Endorsement

This policy is endorsed by the Directors of Intrec Management Pty Limited and Balance Mechanical.

A handwritten signature in black ink, appearing to read 'Brendan Forde'.

Director -Brendan Forde

Date: 08/07/2024

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