



Modern Slavery Statement 2023



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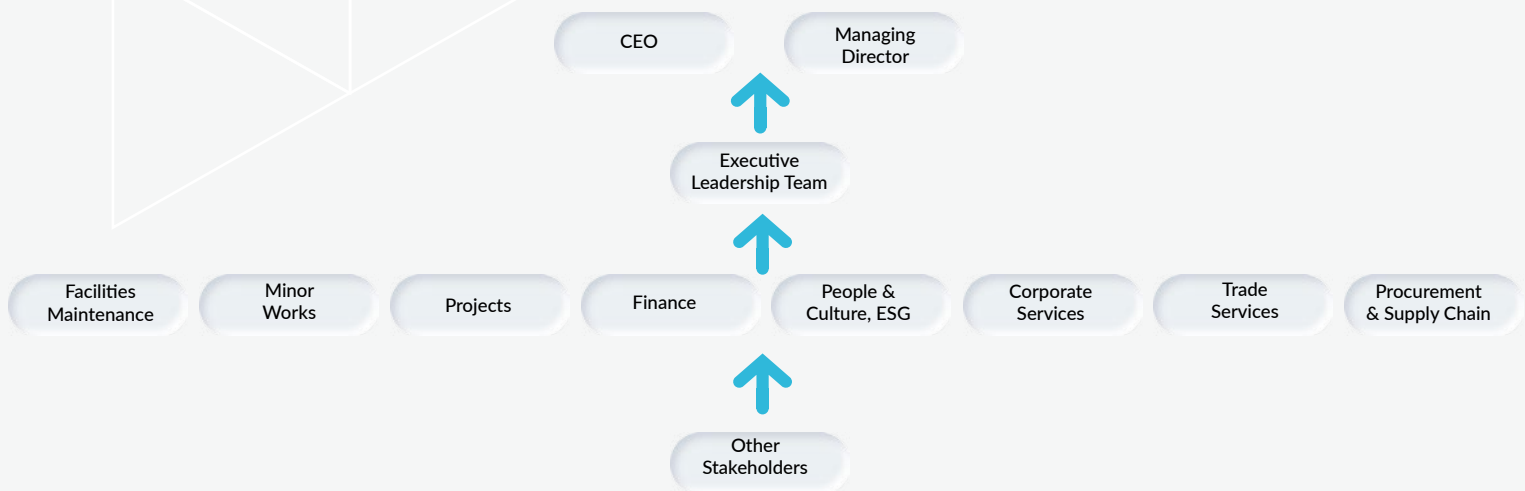


Our Identity

ABOUT THIS STATEMENT

At Modus Projects Pty Ltd, established 16th April 2010 ACN: 143 167 159 ABN:63 143 167 159, we are committed to acting ethically and responsibly in all aspects of the business. This includes actively addressing and preventing modern slavery. The following statement outlines our commitment to combating modern slavery and sets out the steps we have taken to ensure compliance with the reporting entity for purposes of section 13 of the Modern Slavery Act 2018 (Cth).

Governance Structure





Our Structure

Modus Projects is a privately owned Australian company. We specialise in providing high-quality facilities maintenance, building, project management and fit-outs, delivered by our skilled workforce and trusted network of suppliers throughout Australia.

We currently have over 350 employees, 3000 contractors and suppliers, and over 200 clients. Our 11 branches are located across the Eastern seaboard and Western Australia, and we manage approximately 9000 sites throughout Australia. We have long-standing relationships with multiple ASX50 organisations in numerous sectors across banking, fuel, and convenience, as well as government accounts where barriers to entry are high. We strive to maintain the highest standards of integrity, fairness, and respect in all our business practices.





Our Policies

Modus Projects has zero tolerance for all forms of modern slavery such as human trafficking, slavery, forced labour, servitude, debt bondage, deceptive recruiting for labour or services and child labour within our supply chain.

Our policies are the first step in our approach to addressing modern slavery. We have established a comprehensive suite of policies for internal and external use.

The content written in our policies will continue to be updated to reflect relevant circumstances and any changes in the climate in which we operate. All policies are easily accessible to our employees, and they are encouraged to speak up and ask any questions or concerns related to Modus' policies and procedures. To ensure compliance with the Modern Slavery Act 2018, we have implemented the following policies and procedures (See Table 1).

TABLE 1. *Our policies related to Modern Slavery*

Policy	Purpose
Code of Conduct	We maintain a comprehensive Code of Conduct that serves as a guiding framework for ethical conduct within our organisation. We hold all employees accountable for adhering to this Code of Conduct, recognising that it is a shared responsibility to ensure a workplace that is free from any form of exploitation or human rights violations. To facilitate understanding and compliance, we provide regular training and awareness programs.
Grievance Handling Policy	Modus has a formal grievance policy to effectively address and resolve any concerns or grievances that may arise within our organisation. Before commencing their employment, each employee is required to review and sign our Grievance Handling Policy, ensuring their understanding and agreement with the procedures outlined within. This policy serves as a proactive tool to promote transparency, accountability, and the overall well-being of our workforce.
Whistleblower Policy	We established a robust reporting mechanism that allows employees, suppliers, and stakeholders to report any concerns or suspicions regarding modern slavery. We treat all reports seriously and undertake prompt investigations, taking appropriate action if any wrongdoing is identified. Our policy guarantees the protection of whistleblowers and ensures their anonymity, promoting a safe environment for reporting.
Anti-Discrimination, Harassment, & Workplace Bullying	We are committed to fostering a work environment that is devoid of any form of discrimination or harassment based on factors such as race, gender, colour, national or social origin, religion, age, disability, sexual orientation, pregnancy, political opinion, or any other protected status as defined by applicable law. To ensure compliance with these principles, we conduct annual training sessions for our existing staff members, as well as all new employees commencing their induction training in July 2023.
Human Rights & Labour Standards Policy	Modus actively advocates for equal employment opportunities, ensuring that all employees are treated fairly and equally. We maintain a zero-tolerance approach towards disrespect, inappropriate conduct, unfair treatment, or retaliation. Such actions are met with stringent disciplinary measures commensurate with the severity of each case. These guiding principles extend not only to our internal workforce but also encompass our valued business partners.
Child Labour Policy	In alignment with the Australian workplace regulations, we adhere to the guidelines set forth by the National Employment Standards (NES) and state-specific policies to safeguard the well-being of adolescent and youth workers. Our policy ensures strict adherence to work safety legislation, encompassing aspects such as awards, working conditions, overtime regulations, salaries, and other pertinent factors.



Recruitment and Fair Wages

Modus Projects prides itself on employing and retaining fit-for-purpose and highly skilled employees and hiring of their own free will. At Modus Projects we believe in fair working conditions and embrace a respectful work environment. All Modus staff are employed abiding by Australian Workplace legislation (Fair Work Act 2009). All office-based and project-based employees are paid substantially above relevant awards. Hours worked are within legislative requirements. Trade-based employees who would be covered by awards such as Building and Construction and Plumbers Sprinklers Award are also paid above base rates

▶ Internal audits are conducted regularly by our People and Culture and Finance team, to ensure ongoing compliance pertaining to salary, hours worked, and safety.

As part of our commitment Modus continues to engage a top-tier professional services firm to complete internal and external audits relating to our payroll and contingent workforce practices to understand any potential risks and further mitigate any current/future threats to the business. Modus deems its operations as having low to zero risk of exposure to Modern Slavery through recruitment processes including police checks, reference checks, validation of visas and working rights. Any team members employed under 18 years of age are not required to work more than the award requirements and are paid above award rates.





Operations and Supply Chain

We recognise that modern slavery is a global issue and understand the importance of taking proactive steps to address it. Our commitment extends to respecting human rights and promoting ethical conduct throughout our organisation. We expect our service providers, suppliers, and contractors to share our commitment to act lawfully and ethically and to work to ensure that modern slavery is not taking place within its organisation or its supply chain.

We have mapped our supply chain to identify the various tiers and entities involved and screen procedures to evaluate contractors and suppliers to assist in the identification of key risks. Each subcontractor must complete a series of compliance checks such as our modern risk questionnaire, to understand the supplier's approach towards modern slavery exposure, issues, and their procedure to manage and eradicate any potential risks within their business and supply chains before being approved onto our database. Post the induction stage, Modus completes regular ad hoc and scheduled audits to ensure the integrity of this data is correct and the conditions are maintained. Upon this probity, insurance, and credit checks being completed, a service level agreement is issued, and the terms agreed upon by the subcontractor must be signed off before the commencement of working with Modus.

As an organisation, we source our materials from recognised and large suppliers in Australia. These suppliers must have considered their suppliers and conducted due diligence processes regards to the Act. During this reporting period, we have been focused on analysing our modern slavery risks across the full extent of our supply chains as outlined in Table 2.

TABLE 2. Top spend suppliers 2023

Supplier Sector	Description	Risk Rating
Raw Materials	This sector involves the sourcing and supply of raw materials used in construction, maintenance, and fit-out projects, such as timber, metals, plastics, and chemicals.	Low-Medium
Contract Labour	Contract labour refers to the hiring of temporary or project-based workers for specific tasks, such as construction labourers, electricians, plumbers, or painters.	Low
Vehicles	The transport sector involves the movement of goods, equipment, and workers to and from project sites.	Low
IT and telecommunication services	Encompass the provision of technology infrastructure, software, communication networks, and support systems.	Low
Office equipment	Office equipment includes furniture, computers, printers, and other supplies necessary for administrative tasks.	Medium
Marketing services	Marketing services involve activities such as advertising, branding, design, and promotional campaigns.	Low
Freight and logistics	Freight and logistics include the transportation, warehousing, and distribution of goods and supplies.	Low
Catering services	Involve providing meals and food services.	Low



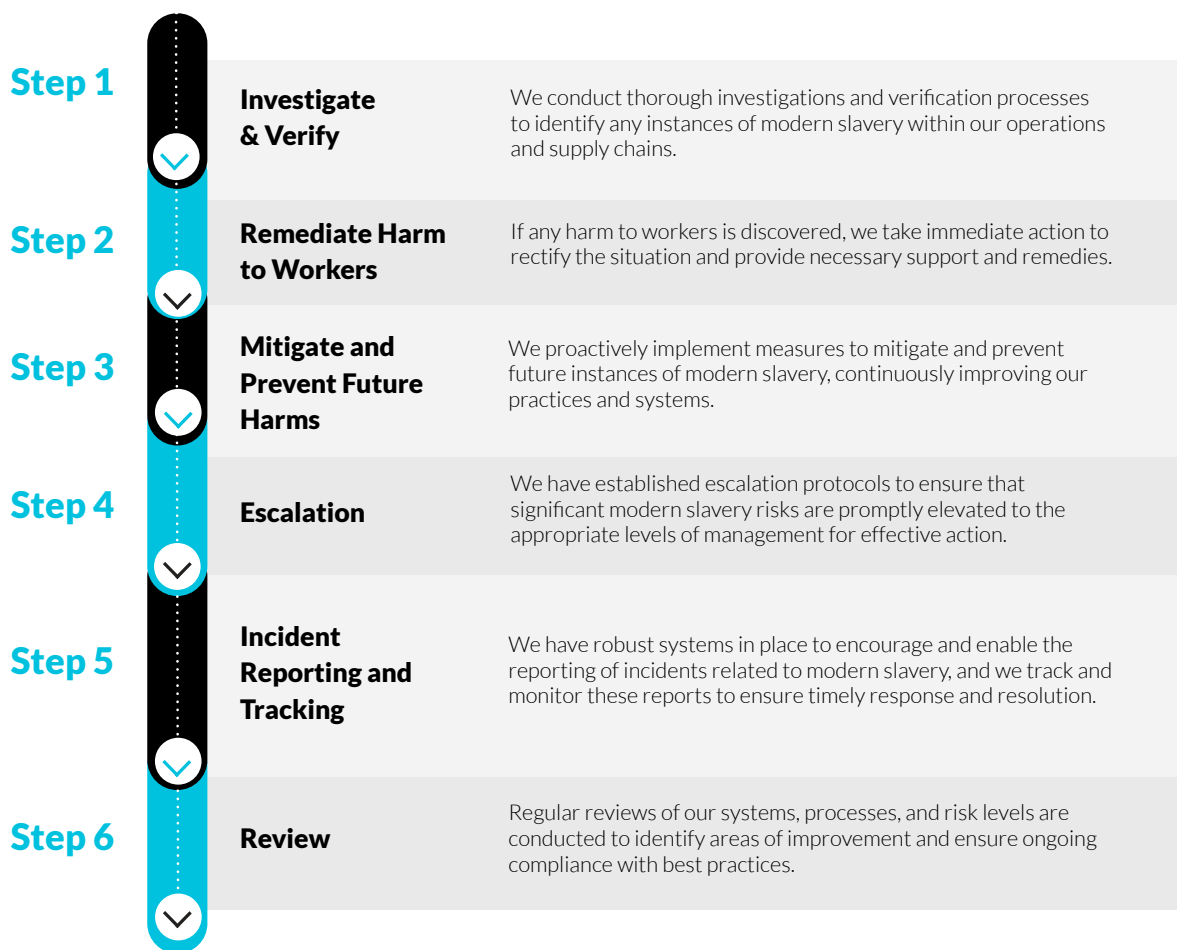
With the invaluable assistance of our team of Human Resources specialists, we have successfully devised risk profiles for our three highest-rated categories, along with corresponding mitigation strategies. These risks have been thoroughly evaluated by referencing external sources such as the Walk Free Global Slavery Index and the Responsible Sourcing Tool. Furthermore, we have carefully considered the standards outlined in the United Nations Guiding Principles on Business and Human Rights, as well as the National Action Plan to Combat Modern Slavery 2020-25.

Our indirect supply chain involves the utilisation of labour in the manufacturing process of materials that Modus procures and subsequently installs at client sites. It is important to note that Modus does not engage in direct importation from overseas. The supply chain within the construction industry, specifically regarding raw materials, is intricate, multi-layered, and often non-transparent. This lack of operational control over overseas factories and the potential impact on labour conditions presents significant challenges in tracing the sources of these materials. Nonetheless, Modus undertakes an assessment of the manufacturers who supply wholesalers, examining their commitment to combatting modern slavery and evaluating their procedures for mitigating its adverse effects. This evaluation has allowed us to ascertain the extent of our exposure to modern slavery and determine the effectiveness of our suppliers' measures in addressing this issue.



Due Diligence To Address Modern Slavery Risks

Recognising the vulnerabilities inherent in the construction business, it is imperative to identify pertinent issues and develop effective prevention strategies. We continuously monitor and review our policies, procedures and supply chains to ensure their effectiveness in eradicating modern slavery following our risk management framework which we adopted from the [Modern Slavery Response and Remedy Framework developed by Minderoo Foundation Walk Free:](#)



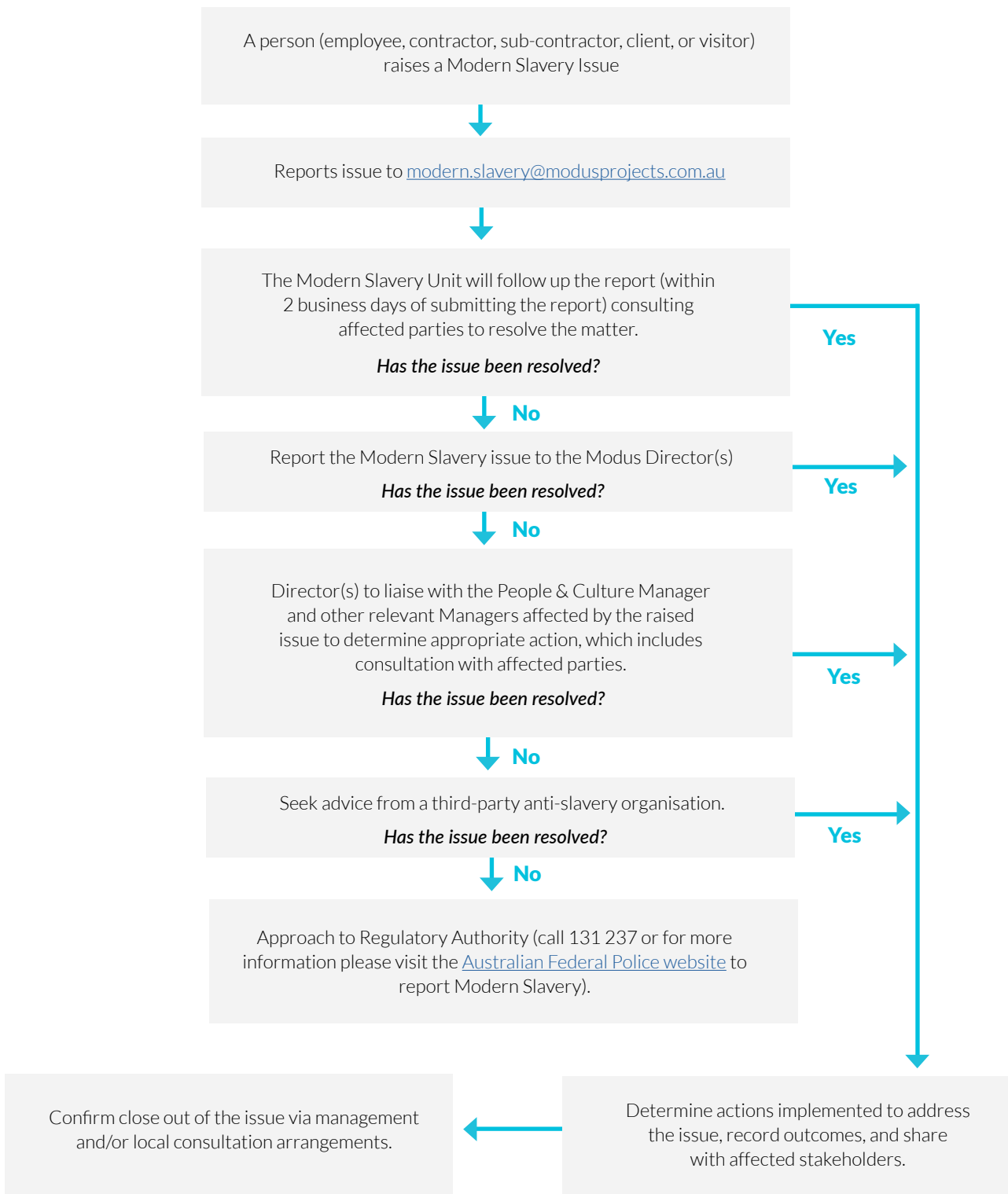
Consistent consultation, collaboration, and communication are integral to our approach. We actively engage with relevant stakeholders to review and determine the level of risk and to foster a shared responsibility in combating modern slavery. Moreover, we engage independent auditing services provided by professional firms to ensure compliance and minimise modern slavery risks to our business.



To ensure the effective handling of any potential Modern Slavery issue, we have implemented a resolution flowchart (see below) that provides clear guidance for identifying and determining the appropriate course of action.

If there is any instance of Modern Slavery associated with any aspect of Modus Projects' activities, we encourage individuals to use our Modern Slavery website, where anyone can conveniently report such incidents by filling out a form designed specifically for this purpose.

FIGURE 1. Modern Slavery Issue Resolution flowchart





Training

Training and awareness are key in assessing modern slavery risks. We provide training and capacity-building initiatives for our employees, suppliers, and stakeholders. This includes workshops and educational resources to raise awareness, improve understanding, and empower individuals to identify and respond to modern slavery risks. All employees are required to complete training annually on Modern Slavery. We foster a culture of reporting and vigilance among our employees, encouraging them to report any suspicions or concerns related to modern slavery. We provide channels for confidential reporting and ensure that all reports are promptly investigated, and appropriate actions are taken.

We measure the effectiveness of our training programs by incorporating feedback after every session to encourage our employees to be involved. Implement necessary changes and learn from past experiences to continuously enhance our approach to combating modern slavery.



Modus is committed to maintaining a proactive and comprehensive approach to combating modern slavery through ongoing education, engagement, and communication with all stakeholders. We remain dedicated to continuously enhancing our practices, staying informed of emerging trends, and adapting our approach to ensure the highest level of effectiveness in our efforts.





Further Steps


We are committed to achieving ethical standards and acting with integrity in all business dealings and relationships, and where possible, to ensure modern slavery is not taking place in our own business or supply chain. We will continue to monitor and review our risk processes and effectiveness through improvements in results, low-risk levels, and non-compliances.

At Modus we continually challenge ourselves to improve our efforts to mitigate the risks of modern slavery by implementing:

	<p>Risk Assessment</p>		<p>We will conduct a comprehensive risk assessment across our operations and supply chains to identify potential areas of modern slavery risk. This assessment will include factors such as geographic locations, high-risk industries, and vulnerable worker populations.</p>
	<p>Supplier Engagement</p>		<p>We continue to strengthen our engagement with suppliers to ensure their understanding and commitment to eradicating modern slavery. This includes incorporating modern slavery clauses in supplier contracts, questionnaires, conducting supplier audits, and review sustainable and responsible resourcing methods.</p>
	<p>Collaboration & Partnerships</p>		<p>We commit to actively collaborating with industry peers, trade associations, NGOs, and government bodies to share best practices, initiatives, and resources in the fight against modern slavery.</p>
	<p>Reporting & Communication</p>		<p>We will work to develop clear and transparent reporting mechanisms to track progress, measure impact, and communicate our efforts to stakeholders. This includes regular reporting on key performance indicators, as well as the publication of an annual modern slavery statement.</p>
	<p>Stakeholder Engagement</p>		<p>We will continue to engage with external stakeholders, including customers, investors, and civil society organizations, to understand their expectations, gather feedback, and collaborate on initiatives to combat modern slavery.</p>

We recognise that eradicating modern slavery is a complex challenge that requires collaboration and ongoing effort from all stakeholders. Through our policies, procedures, and responsible business practices, we aim to contribute to a world where every individual is treated with dignity, respect, and fairness. Our modern slavery statement will be reviewed annually and published on our website to demonstrate our transparency and commitment to combating modern slavery.

This statement was approved by the Board of Directors of Modus Projects Pty Ltd on 01/08/2023


 Brad Berryman
 CEO


 Troy Mayne
 Managing Director

We Are Modus.

Bringing life & innovation to the built environment.

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