



# MODERN SLAVERY STATEMENT 2020

## INTERMAIN GROUP

MARCH 2021

INTERMAIN

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We acknowledge the traditional owners of country throughout Australia and recognise their continuing connection to land, waters and culture. We pay our respects to their elders past, present and emerging. Intermain is committed to building, valuing and promoting diversity and inclusiveness.

Intermain is committed to building, valuing and promoting diversity and inclusiveness. We are dedicated to the Reconciliation Action Plan (RAP) program and are formally underway for our Innovate RAP to be endorsed. Our RAP details our commitment to developing long-term, beneficial and reciprocal partnerships with Aboriginal and Torres Strait Islander peoples and communities.



# A STATEMENT FROM THE CEO/MD

After 20 years of operating, I'm proud of the culture of integrity that underpins Intermain. We are committed to working responsibly and adhering to high ethical and social standards. We are on a mission to improve our environmental and social impact on every level; thus, we are proud to release our 2021 Modern Slavery Statement.

Our commitment to combatting modern slavery risks is fully supported by every level of our organisation.

Intermain rejects any activities that may cause or contribute to modern slavery, including forced or bonded labour, child labour, human trafficking, slavery, servitude, forced marriage, or deceptive recruiting for labour or services. We're pleased to publish our first Modern Slavery Statement, which outlines our approach to address and minimise the risk of modern slavery in our business operations and supply chains.

Ensuring that modern slavery is not taking place in Intermain's workforce, which includes our supply chain beyond our direct suppliers, is a priority. We have implemented a risk-based approach and are committed to continuously improving our processes. Our framework includes engaging with our direct suppliers to educate, assess and encourage improvement in their capacity to manage modern slavery risks within their broader supply chains.

We will continue to collaborate with our internal and external stakeholders to address our modern slavery risks and improve our processes.



**Andrew Johnson**

Chief Executive Officer and Managing Director

**The Board or Andrew Johnson Holdings Pty Ltd has approved this statement on 30 March 2021.**

# 01. ABOUT INTERMAIN

Established in 2001, Intermain including each of its entities, and associated entities, is one of Australia's leading fitout, refurbishment and building services companies. Intermain delivers functional spaces for a wide range of clients, collaborating with prominent industry consultants to deliver commercial, industrial, government, healthcare, and education projects nationally. As part of our national practice, we are firmly committed to conducting business with the highest integrity and in compliance with the letter and spirit of the law.

In 2018, the Australian Government passed the Modern Slavery Act No. 153, 2018 ('the Act'), that requires large corporations in Australia with turnover in excess of \$100 million, to annually report on the risks of modern slavery in their operations and supply chains, and actions taken to address those risks. For the purposes of the Act, this statement is submitted for a Single Reporting entity, Andrew Johnson Holdings Pty Ltd, ABN 54 089 200 448 and in accordance with Section 13 of the Act.

Intermain acknowledges that modern slavery happens at the most extreme end of the working spectrum. It involves the gravest abuses of human rights and serious crimes, having severe and often lifelong consequences for its victims. The term modern slavery is used to describe situations where coercion, threats or deception

are used to exploit victims and undermine their freedom. The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. The worst forms of child labour means situations where children are subjected to slavery or similar practices or engaged in hazardous work.

Intermain intends achieving a zero-tolerance approach to modern slavery and we are committed to consistently reviewing and strengthening our processes and systems to minimise the risk of human rights infringements anywhere in our supply chain.

## The **Modern Slavery Act 2018** defines

modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.\*

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## The Intermain Group includes:

Intermain Pty Ltd	ABN 62 096 189 623
Intermain W.A. Pty Ltd	ABN 91 165 551 646
Intermain Queensland Pty Ltd	ABN 47 158 180 459
Intermain Victoria Pty Ltd	ABN 73 158 142 495
Intermain ACT Pty Ltd	ABN 43 632 187 592
Andrew Johnson Holdings Pty Ltd	ABN 54 089 200 448



\*Refer to [www.legislation.gov.au/Details/C2018A00153](http://www.legislation.gov.au/Details/C2018A00153)

# 02. COMPANY STRUCTURE OPERATIONS AND SUPPLY CHAINS

Intermain has five offices across Australia, with our headquarters based in NSW. Intermain employs approximately 130 full time staff, with teams on the ground in QLD, VIC, ACT, and SA. In addition, we have a large pool of trusted, highly skilled Subcontractors.



For each project, we assemble just the right team for the job – engaging designers, builders, specialist trades and project managers as required. We take pride in how we treat our people and believe that these respectful relationships result in a team that is committed, reliable and a pleasure to have onsite.

Our employees' safety and wellbeing are of pivotal importance, and we do whatever we can to keep our people healthy and happy. We aim to hire and retain the very best people, provide them with a balance of stimulation and security, and create a working environment that is inclusive and supportive. We also place great emphasis on education and training – keeping staff up to date with work, health and safety regulations and environmental awareness programs, and keeping an eye on our ongoing compliance by conducting regular site inspections.



## SAFETY & ENVIRONMENT

Our **accountability** includes, **protecting** the safety of our people onsite and protection of the environment, which are non-negotiable, and Intermain is proud to have an excellent record in this area.



## COMPLIANCE

Our company is listed on the International Compliance Information Exchange, which makes compliance checks quick and easy – and we have a **dedicated Business Management System and Health & Safety Officer** ('BMS/WHS Manager'), who reviews site risk assessments and random site audits to achieve our objective of zero-harm.



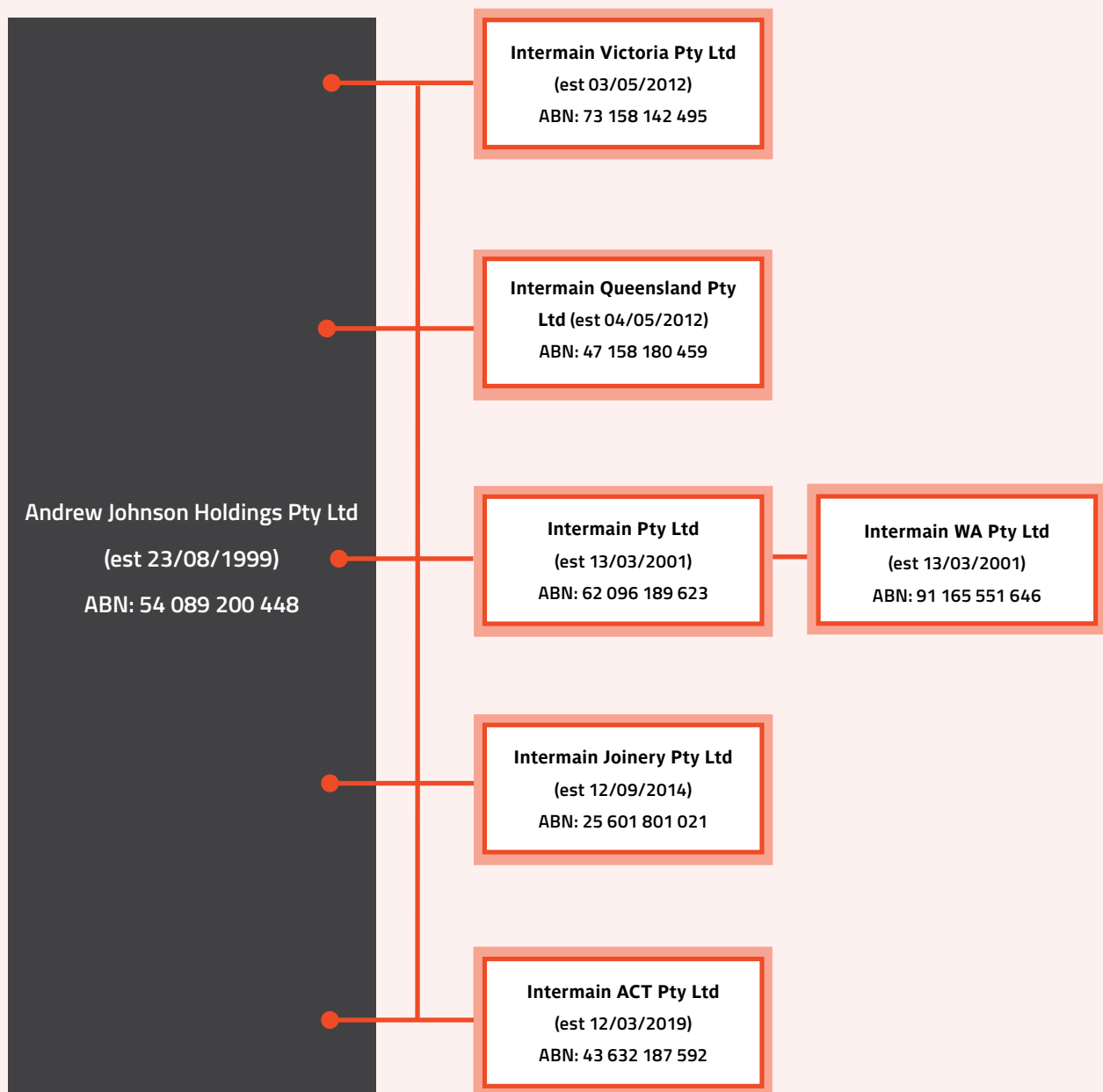
## WHS & ENVIRONMENT PROCESSES

In addition, Intermain have certified processes that require completion of **WHS & Environmental Risk Assessments** that include hazard management and emergency management at each of our workplaces.

Intermain has extended our accountability to ensure our business and our people are aware of the risks of modern slavery in our operations and supply chains, and actions taken by Intermain to address these risks. We aim to be equally proud in ensuring our compliance with modern slavery requirements.

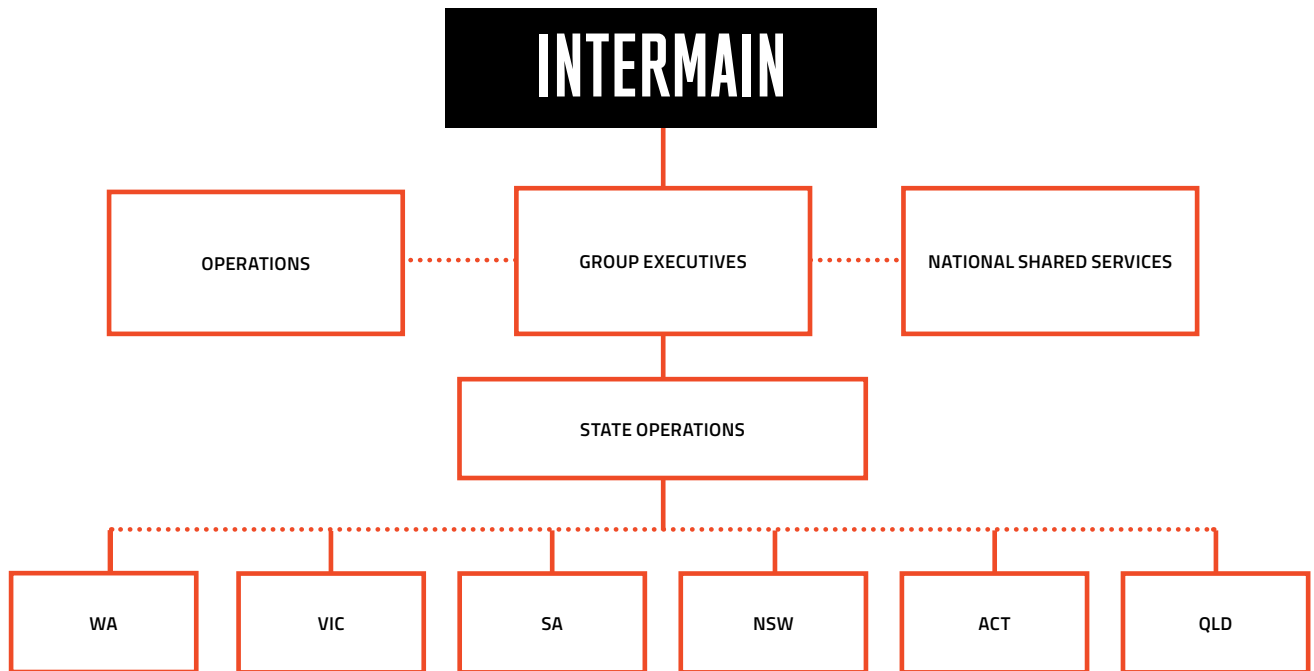


# GROUP STRUCTURE



Each entity listed above is a wholly owned, subsidiary of our parent company Andrew Johnson Holdings Pty Ltd. These entities all operate under the same policies, procedures, plans and integrated management system governed and managed by the Intermain Board of Directors, our Management Team and our Senior Leadership Team.

# ORGANISATION STRUCTURE



The responsibility for managing and ensuring compliance in our operations and supply chain rests with our Chief Operations Officer and BMS/WHS Manager who are based in our Sydney office.



**130 EMPLOYEES**



**5 OFFICES NATIONALLY**

Intermain provides fitout, refurbishments and building services across a diverse range of industry sectors, including:



COMMERCIAL



INDUSTRIAL



GOVERNMENT



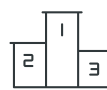
RE-USE & HERITAGE



EDUCATION



HEALTH & AGED CARE



SPORT & REC



JOINERY

# 03. RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

Intermain is committed to the highest standards of ethics and business integrity in our operations and supply chain. We aim to ensure our staff and suppliers are treated fairly, with respect and dignity, to uphold the said highest standards.

Intermain's foremost risk of modern slavery in our operations and supply chain, vests in our subcontractors, who perform the required design, build, trades and project management related services during the implementation and delivery of our projects.

All subcontractors are required to comply with our Subcontractor Management procedure; being a formal documented process, which ensures subcontractor engagement uniformity and standardisation, that is subject to on-going monitoring, review, and improvement. Subcontractors are carefully vetted to ensure they align with our legal and contractual obligations.

Similarly, our high ethical standards are at the core of how we engage with our subcontractors and reflects how we work as an organisation.

We have considered the Modern Slavery List of Industries and List of High Risk Countries, as provided for in The Global Slavery Index 2018, in determining our risks of modern slavery in our operations and supply chain. We have further considered information and resources made available through organisations that includes:

- The Transparency International Corruption Perceptions Index.
- Global Contact Network; Global Estimates of Modern Slavery 2017.
- Hidden in Plain Sight', Report of the 2017 Parliamentary Inquiry into establishing a Modern Slavery Act in Australia; and
- The Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities.

Locally based, we have identified four areas of high risk to modern slavery within industries, goods and/or services, amongst our subcontractors, namely:

- ELECTRICAL EQUIPMENT
- ELECTRONIC EQUIPMENT INSTRUMENTS AND COMPONENTS
- IT SUPPLIES AND SERVICES
- PEOPLE SERVICES

We understand that our Subcontractors source the vast majority of the goods and services within Australia, whilst the balance is predominantly sourced from countries with a low risk of modern slavery, which includes the USA, Singapore, New Zealand and Germany.

## WE HAVE IDENTIFIED FOUR AREAS OF HIGH RISK TO MODERN SLAVERY

01.



ELECTRICAL EQUIPMENT

02.



ELECTRONIC EQUIPMENT, INSTRUMENTS, AND COMPONENTS

03.



IT SUPPLIES AND SERVICES

04.



PEOPLE SERVICES



## 04. ACTIONS TAKEN BY INTERMAIN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

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In 2020 Intermain, working in consultation with a third-party consulting firm, conducted a modern slavery risk assessment of our operations and supply chain, creating a modern slavery framework, which assisted us in the preparation of our first modern slavery statement. The process was driven and headed by our Chief Operating Officer, supported by our internal Systems Administrator/Business Analyst, responsible for our creditors, and our BMS/WHS Manager, responsible for amongst others related: policy development; conducting risk assessments; training; conducting frequent inspections and site visits; and implementing preventative, detection and monitoring processes.

### The assessment comprised two elements:

- 01.** Identified existing risk management policies and procedures within Intermain and determined whether this can be broadened to include the Risks of Modern Slavery, through ethical sourcing, quality standards or other compliance reporting.
- 02.** Conducting a risk assessment over our current suppliers in terms of our payment data, for a 12 month period 1 July 2019 to 30 June 2020. We extended this to include payments made to suppliers to 19 October 2020.





**WE CONDUCTED A  
DESK TOP REVIEW OF  
70 OF OUR TOP SPEND  
SUPPLIERS.**

**THE RESULTS  
IDENTIFIED THAT  
THE 70 SUPPLIERS  
SCORED AN  
OVERALL MODERN  
SLAVERY RISK  
RATING OF  
MODERATE TO LOW  
RISK.**

**In conducting a risk assessment of existing risk management policies and procedures, we reviewed all relevant policies including: Internal Audit; Subcontractor Management; Consultant Prequalification; Vendor Application; Purchasing- Hiring Materials & Equipment; Industrial Relations; Recruitment; Standard Terms of Employment; Offer of Employment; Code of Conduct; Appropriate Workplace Behavior; and Grievance's procedure.**

We updated a number of these policy documents to make reference to and include the requirements of the Act. We further developed a Modern Slavery policy, Whistleblower policy and a Supplier Code of Conduct that makes provision for modern slavery.

In performing the risk assessment of our suppliers, we conducted a desk top review of 70 of our top spend suppliers, that comprise 93% of our total spend. 60 of these 70 suppliers are subcontractors. Intermain considered risks that may potentially cause, contribute to or be directly participating in modern slavery practices, consistent with the Act

and the Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities. These risks areas included: Financial; Industry; Country (geographic location); Subcontractors; and evidence that the supplier has submitted a modern slavery statement if applicable.

The results of our desk top review identified that the 70 suppliers scored an overall modern slavery risk rating of moderate to low risk. This is based on what was determined by us using publicly available records and information we had previously obtained from our suppliers.

We have recently created a vendor portal, which is still in its infancy. The said portal makes provision for use by suppliers, subcontractors and consultants who wish to engage with Intermain. The questionnaire contains probing rather than generic modern slavery questions, which also provide for a risk rating for each relevant modern slavery question, and the submission of supporting documents to us where applicable. We believe this is a vital step in identifying and where applicable, eradicating human trafficking and modern slavery, where there is any indication or slightest suspicion that this may be occurring.

# 05. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

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We have described our actions taken in the immediate assessment of modern slavery risk within our operations and supply chain. This includes policy review, drafting of new policies and a risk assessment for our high spend suppliers. In doing so Intermain has mapped out key parts of operations and supply chains to improve understanding of potential modern slavery risks.



## VENDOR PORTAL

All new and existing suppliers, subcontractors and consultants will be vetted for modern slavery risks through our vendor portal, the completion of a questionnaire that incorporates modern slavery requirements and the provision of supporting documents where applicable. The portal is now a prerequisite/precondition to the establishment of new suppliers. Intermain aims to use the portal and information obtained from this, to build transparent and collaborative relationships with suppliers and will further ensure that our expectations of reporting of modern slavery risks within the supplier's supply chain has been clearly communicated to us, and that we have satisfied ourselves that modern slavery risks have been effectively managed.



## POLICY REVIEW

We will review our policies that now incorporate and make provision for modern slavery compliance and ensure that Intermain staff and suppliers where applicable, certify that they have read and understand these policies, on an annual basis. We will monitor our modern slavery internal controls, procedures and implement improvements to ensure they remain effective. This will include updating policies and procedures where deemed necessary.

## 06. THE PROCESS OF CONSULTATION WITH ANY ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS

The Intermain Group is centrally controlled and managed from Sydney by a tightly held group of shareholders of the ultimate holding company Andrew Johnson Holdings Pty Ltd. Modern slavery requirements were discussed with this management group and a sub-committee was formed to work with a third party consulting firm to develop our modern slavery framework.



All new and enhanced policies were tabled for approval to the management team and all policies are rolled out to all companies within the group and business units simultaneously. All existing staff within the Intermain group have undertaken modern slavery training and feedback was encouraged. This training is now incorporated into our new employee induction onboarding process.

## 07. OTHER RELEVANT INFORMATION; OUR WAY FORWARD

- 01.** Performing social accountability audits, by regularly conducting onsite inspections of our suppliers and subcontractors to evaluate their practices with respect to the treatment of their workers and identifying and determining any potential risks, including modern slavery and human trafficking.
- 02.** More intensive training to management employees, particularly those in charge of supply chain management, to understand in more detail what slavery and human trafficking entails and how to mitigate the risk of these in their respective supply chains.
- 03.** Enhancing modern slavery training to our staff in the next calendar year. This may entail online courses, in-person meetings with management and/or written resources.
- 04.** Developing internal accountability standards and procedures further, to hold our employees and contractors accountable for non-compliance with our standards on modern slavery and human trafficking, including:
  - Establishing consequences for non-compliance
  - Establishing a process to remediate such breaches

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