

# Growthbuilt Pty Ltd - Modern Slavery Statement

## 1 Identify the reporting entity

This Statement, pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) (**the Act**) is prepared by Growthbuilt Pty Ltd (ABN 43 115 132 020) (**Growthbuilt**) on behalf of itself and its subsidiaries (each, **we, us or our**). This Statement sets out how we monitor, manage and minimise the risk of modern slavery in our business and supply chains, and how we comply with the Act.

## 2 Describe the structure, operations and supply chains

Our main business activities are design and construction of residential, commercial and mixed used buildings.

The services that we provide are principally in NSW, Australia. We employ **110** employees and **100%** of them work in **Construction or Construction related Industry**.

The goods and services in our supply chains predominantly relate to building and construction goods and services. We engage approximately **600** suppliers and use 30 of these suppliers on a regular basis. Our suppliers are predominantly located in Australia, NSW, and over 95% of our spend on these suppliers is within our Construction businesses.

## 3 Describe the risks of modern slavery practices in its operations and supply chains

Risk is a critical consideration for all our personnel. Based on our risk assessment of the possible modern slavery risks in our operations and supply chains, the following risks have been identified:

- raw materials and supplies are often sourced from high-risk geographies;
- low-skilled workers are more vulnerable to exploitative practices;
- outsourcing is common which makes modern slavery more difficult to identify and manage; and
- short term engagements can make continuing to monitor risk difficult.

High risk geographies may include countries which are conflict-affected, have a weak rule of law, or have high levels of corruption in the public sector. Procurement of raw materials or supplies for construction work is often through a third-party sourcing from these countries. This reduces the visibility of where the products are sourced and what practices are involved in various parts of the supply chain. Growthbuilt seeks more detailed information from suppliers who source materials from these high-risk geographies in order to avoid modern slavery in any stages of the supply chain.

Growthbuilt continually updates their risk protocols and procedures based on information we collect from our suppliers in order to respond to the risks we identify.

## 4 Describe the actions taken to assess and address those risks

We perform risk assessments regarding modern slavery activity in our global supply chains at least once per year.

We have mapped our operations and supply chains to identify the areas of greatest risk of modern slavery to inform our risk management and procurement processes. We have analysed which of our contracts deal with high risk suppliers, geographic locations, sectors, industries and services. This assists us to respond to and address any potential risks and consider opportunities for improvement in the human rights space in our business and supply chains.

Based on the mapping of our operations and supply chains we have developed a modern slavery policy and supplier code of conduct. These documents aim to create a framework for our suppliers to

help identify and avoid modern slavery practices in their supply chain. It is compulsory that all suppliers we engage acknowledge receipt, understanding and compliance with these documents before we begin working with them. While these documents apply across all our operations and suppliers, they have been prepared to focus, in particular, on the higher risk areas for modern slavery in our operations and supply chains.

We undergo a risk assessment of all our potential suppliers to evaluate whether we will contract with them. This process involves identifying potential modern slavery risks, assessing their probability and consequence, and acting to prevent exposure to any identified risks. The diagram below sets out our due diligence process:



As part of the initial due diligence process, we include modern slavery questions in the pre-qualification questionnaire for prospective suppliers. Where the risk profile of a supplier is identified as “high”, they are required to undergo additional risk assessment and are subject to ongoing reporting and compliance requirements. “Lower risk” suppliers are not required to undertake the same reporting and compliance requirements. Once the supplier has passed the due diligence process, we also seek to include provisions regarding modern slavery in our contracts.

Any exceptions to the process we have set out above are subject to the approval of a member of the Senior Leadership Team. Our expectation is that exceptions will be limited and rare.

**5 Describe how you assesses the effectiveness of such actions**

As mentioned above, we perform risk assessments regarding modern slavery activity in our global supply chains at least once per year.

Where material risks are identified with a supplier, we work with the supplier to develop an action plan with clear steps to respond to the risks and ensure that there is ongoing monitoring of the supplier’s implementation of and compliance with the action plan.

We will then continue to monitor their operations throughout the life of the transaction. This may require audits of their suppliers supply chain and follow up questionnaires. If any modern slavery issues are identified during this process the supplier is encouraged to remedy the situation. If an acceptable outcome is not reached Growthbuilt will terminate the agreement with the supplier.

We believe in acting against modern slavery when suspected or actual incidents are identified. All staff members are trained to notify their manager if they suspect or believe there is any incident, practice or conduct of modern slavery in any part of our operations or supply chains. We encourage open, good faith reporting in relation to any such concerns.

## **6 Describe the process of consultation with other group entities covered by the report**

Growthbuilt's senior management periodically meet to review and update the groups policies and procedures surrounding modern slavery. This allows the experience of all entities in the group to be leveraged to develop new tools and processes to prevent and respond to instances of modern slavery.

## **7 Describe the training about modern slavery available to employees**

We conduct regular staff training about modern slavery, risks in supply chains, and the processes to take appropriate action. It is mandatory for all our directors, employees, contractors, business partners and suppliers to read and comply with our Modern Slavery Policy. To generate changes in employee behaviour and ensure the training we provide is up to date we continue to review the modern slavery resources available to our staff and business partners. Our goal in providing these resources is to ensure our employees and suppliers are well equipped to respond to instances of modern slavery.

## **8 Any other information which Growthbuilt considers relevant**

Growthbuilt is continuing to engage with its legal and commercial advisors to review and develop its modern slavery policies and procedures. As part of this process we are also updating our ancillary documentation such as our subcontractor questionnaire.

## **9 Acknowledgement**

This modern slavery statement has been approved by the board of directors of Growthbuilt Pty Ltd on 25<sup>th</sup> March 2021. This statement is signed by a director on the board of directors, Colin Rahim Joint CEO, as a responsible member of Growthbuilt Pty Ltd.



Colin Rahim

Joint CEO, Growthbuilt Pty Ltd

25<sup>th</sup> March 2021