



Modern Slavery and Human Trafficking Statement June 2020

GROSVENOR]
engineering group

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MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

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Modern Slavery and Human Trafficking Statement

Grosvenor Engineering Group June 2020

Grosvenor is passionate about bringing smarter buildings to life and creating long-term sustainable value for building owners, managers, and their occupants.

At Grosvenor we uphold high moral, ethical and sustainable business practices, including those related to human rights. We also recognize that human rights are an area of growing importance to our employees, shareholders, and customers.

1.1 Organisational Structure, Operation and Supply Chain

Grosvenor operates nationwide. It also acts as a parent company to the following trading names Air-rite, KL Air and Harding's HVAC & Refrigeration. Our head office is based in Sydney NSW with two significant operational hubs in Melbourne and Brisbane, employing over 750 people. The head office function has responsibility for the Groups strategy, policy and governance.

An Australian-owned company established in 1994, we have grown to become a leading building services provider with over \$2.2 billion of assets under management across 16,800 sites nationwide. With a proven history of delivering real business outcomes to buildings by making them safer, more comfortable, productive and energy efficient – at the lowest possible cost. Grosvenor has developed a powerful asset maintenance and lifecycle management ecosystem.

Given the nature of our services our workforce is typically highly skilled and in permanent employment, we do not typically employ seasonal or temporary resources.

Grosvenor has a national supply chain with suppliers from the following sectors: Information; Communications; Technology; Property services (including facility management, utilities, cleaning, waste management and security); Logistics and correspondence; Consulting services; Marketing; Print and promotional goods and services; Fleet management; Office supplies and corporate clothing.

1.2 Due Diligence and Remediation

Grosvenor works with stakeholders to identify and understand the impact of its activities and to limit negative impacts. Due diligence is implemented to prevent and mitigate adverse impacts as Grosvenor seeks to only do business with suppliers that have similar values and respects a safe, fair, and sustainable working environment.

Grosvenor's management of modern slavery falls within its overall approach to protecting human rights and is guided by our [Supplier Code of Conduct](#) document.

This document outlines Grosvenor’s expected standard of behavior and conduct from our suppliers and what we stand for as an organization.

All suppliers conducting business with Grosvenor must ensure that their operations follow applicable laws, standards and regulations that pertain to Modern Slavery and Human Trafficking. All such suppliers must have read and understood the document provided.

In addition to suppliers complying with Grosvenor’s Suppliers Code of Conduct, we expect our suppliers to require their own suppliers to comply with similar principles to those outlined in our Supplier Code of Conduct.

Grosvenor endeavors to ensure that slavery, unlawful child labor and human trafficking are not taking place through our supply chain. We do this by also requiring our suppliers to provide their Modern Slavery and Human Trafficking statements to us to continue a partnership.

Grosvenor has incorporated our modern slavery Statement into our “Request For Pricing” process so that future or potential suppliers are aware of our stand and position on this subject.

Grosvenor has incorporated our modern slavery position into our “New Supplier Request Form” so that each new supplier is properly advised.

Our vision, purpose and values are integral to the way we operate our business, other policies that assess and mitigate risks of modern slavery and human trafficking are included below, but are not limited to our:

- Whistleblower Policy
- Code of Conflict
- Anti-bribery and Anti-Corruption Policy
- Bully & EEO Policy

1.3 Risk Management

Grosvenor has established a “High Risk Assessment” document to identify, assess, mitigate, and determine if suppliers may have a higher risk or exposure to human rights concerns including modern slavery and human trafficking.

1.4 Monitoring our Effectiveness

We continue to monitor the effectiveness of our processes and procedures to address the risk that our business contributes to or is directly linked to modern slavery through our operations and supply chains and to take all necessary steps to ensure that our process and procedures are appropriate. We require our suppliers to continue to demonstrate vigilance and ethical working practices relating to modern slavery and human trafficking as evidenced by our due diligence process.

1.5 Communications

Grosvenor’s Board of Directors have approved the Modern Slavery and Human Trafficking Statement.

Grosvenor has communicated our Supplier Code of Conduct, Sustainable Procurement and Modern Slavery and Human Trafficking Statement company wide. We have also made the document available on our employee intranet. All three documents and expectations have also been made part of our employee on-boarding and inductions experience.

For further information, please refer to the Procurement Team

1.6 Related Documents

Supplier Code of Conduct	High Risk Assessment	Sustainable Procurement
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This Modern Slavery and Human trafficking Statement is approved in accordance with a resolution of the Board of Directors.

Director
Nicholas Lianos

Director
Peter Souflias

Dated 23 March 2021