

**M****ODERN  
SLAVERY  
STATEMENT**



# CONTENTS

Message from our Managing Director	3
Structure, operations and supply chain	4
Workforce	5
Procurement	5
Risk of modern slavery in our supply chain	7
Life Cycle Assessment	7
How we prevent and mitigate the risk of modern slavery	8
Governance	8
Policies	9
Due diligence and management controls	9
Reporting human rights concerns	10
Response and remedy framework	10
Measuring the effectiveness of our modern slavery framework	11
FY23 Progress	11
Case Study: Track & Trace on GRC panels	12
Continual improvement	13
2024 Action Plan	13
Consultation	14
Approach	14
Approval	14
Appendix	15

## Acknowledgement of Country

Buildcorp acknowledges the traditional owners of the lands on which our offices are based and on which we work. We honour their connection to the land, waters and sky, and pay our respects to their Elders past, present and emerging. We walk together on Country in the spirit of reconciliation.

# Message from our Managing Director

**Modern slavery is a global human rights violation. In 2021, 49.6 million people were enduring modern slavery conditions and 27.6 million were engaged in forced labour. Globally, G20 nations face a combined risk of US\$468 billion from goods tainted by modern slavery. According to the International Labour Organisation and Walk Free Foundation, almost a quarter (23%) of global profits generated from forced economic exploitation are concentrated in industries such as construction, manufacturing, mining and utilities.**

In Australia, Anti-Slavery Australia estimates that only 1 in 5 victims of modern slavery are identified or feel secure enough to come forward, despite 41,000 individuals impacted. Approximately \$17.4 billion worth of Australian imports are intricately connected to modern slavery, with at-risk products including electronics, fish, garments, solar panels and textiles. These numbers, along with the fact that 14% of modern slavery offenses referred to the Australian Federal Police in FY22 involved forced labour, highlight the urgent need for comprehensive and collaborative efforts to combat modern slavery on an international scale.

At Buildcorp, we are determined to play our role in taking concerted action to eradicate modern slavery and protect the rights and dignity of those who are most vulnerable to exploitation.

In 2023, as part of our commitment to constant improvement, Buildcorp continued to dive deeper into our supply chain, giving more than 250 of our suppliers the opportunity to collaborate on supply chain traceability studies. This has enabled us to better understand our supply chain as well as the barriers to our suppliers and trade partners in providing the detailed information required to undertake this level of due diligence.

The results of these initiatives are provided in this report. The most compelling discovery was that even larger supplier and trade partners, who would be required to report under the NSW or Commonwealth Modern Slavery Acts, did not have a good understanding of their obligations. Nor were they adequately prepared to participate in traceability studies.

This year, for the first time, Buildcorp undertook a modern slavery risk assessment of the supply chain for a specific building component at the request of our client, IPST Super Property. As a result of our traceability and transparency findings undertaken by Trace SCI and Unchained Solutions, we were able to provide IPST with a breakdown to Tier 4 and 5 of our suppliers and complete a 2-Pillar Sedex Members Ethical Trade Audit (SMETA) and a follow up Corrective Action Plan Audit.

As the member of an industry with heightened exposure to the risk of modern slavery, Buildcorp has invested in a range of initiatives to support responsible procurement across our business. These initiatives aim to mitigate risk in our supply chain by complying with human rights, labour rights and environmental laws. We are also committed to the sustainable growth of our business, ensuring the long-term job security of our people, suppliers and subcontractors.

This 2023 Modern Slavery Statement outlines our ongoing actions to work with our project partners to understand our supply chain risks and eliminate modern slavery in our operations.

**Tony Sukkar AM**  
Managing Director  
Buildcorp Holdings Pty Limited

13 December 2023

Since 2021, Buildcorp has been committed to the United Nations Global Compact corporate responsibility initiative and its principles in the areas of human rights, labour and the environment, and anti-corruption.



# Structure, operations and supply chain

Buildcorp operates in the non-residential construction industry across three broad market sectors, each with similar supply chains:



New build projects, such as health, education, sporting facilities and commercial offices



Fit-out and refurbishment projects, primarily in existing commercial office buildings



Building remediation projects in residential, commercial and infrastructure facilities

**Buildcorp's** business operations are headquartered in Sydney with offices in Brisbane and Melbourne.

## Queensland

Level 8, 189 Grey Street,  
South Brisbane QLD 4101  
P 07 3139 0800

## New South Wales

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Level 4, 10 Mallett Street,  
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## Victoria

Level 18, 627 Chapel Street,  
South Yarra VIC 3141  
P 03 9975 8800

## Workforce

### Our people

On 30 June 2023, Buildcorp employed 415 staff. Nearly all of them are employed directly under permanent, fixed-term, part-time or casual contracts, or under enterprise bargaining agreements.

Like many other employers in our industry, Buildcorp makes use of workforce labour hire arrangements, working with vetted organisations providing these services. All Buildcorp and labour hire employment contracts meet or exceed applicable state and federal employment standards. These arrangements significantly reduce the likelihood of modern slavery.

### Subcontractors

Buildcorp is a project management-based construction company that subcontracts most worksite activities to Australian-based businesses. Buildcorp deals with approximately 300 subcontractor businesses at any one time, with most of the businesses classified as small to medium enterprises.

In many instances, these subcontractors engage their own subcontractors or material suppliers. Buildcorp's subcontract engagement agreements require subcontractors to seek approval before subcontracting any of their own works.

We are mindful that the existence of subcontract layers means we may not always have direct supervision over our third-party workforce or complete transparency over their terms and conditions of employment.

To gain a better understanding, in 2023 Buildcorp conducted a traceability and transparency study with 254 of suppliers, with 138 responding. Based on ~ 97 responding companies, the study found a subcontractor base of around 23,000 employees and contractors, with more than half of that base (15K+ employees) reported by one supplier. The study also told us that:

- 65.66% of respondents outsource the products or services provided to Buildcorp.
- 82.52% of responding suppliers hold no Corporate Social Responsibility accreditations.
- 11% of respondents use casual labour from overseas employed via labour hire agencies based in Australia.

## Procurement

As part of our procurement standard practice, all suppliers and subcontractors, regardless of location of operations, are required to comply with our [Supplier Code of Conduct](#) to do business with Buildcorp. *Section 3. Human Rights and Fair Labour Practices* outlines our zero-tolerance policy in relation to modern slavery.

Our Modern Slavery Survey 2023 found 36% of respondents including the Buildcorp Code of Conduct in their own Supplier agreements.

In the reporting year, we sourced goods and services from Australian-based businesses from 1,841 subcontractors and 1,088 suppliers for:

- Plant and equipment hire
- Professional services
- Cleaning and waste removal
- Electrical and data services
- Construction materials and services
- Labour hire
- Office suppliers and maintenance

In addition, we sourced goods and services directly from 18 overseas-based suppliers, mainly in the technology services segment. Direct sourcing for our projects extended to cladding from China, timber from Germany, and a damp cabinet from the United Kingdom.

Regardless of product sourcing locations, we recognise that construction materials can be processed and assembled in different countries, elevating the risk of modern slavery. The construction supply chain for raw materials is long, complex and often opaque, making it extremely challenging for end users to trace their origins. We are vigilant in monitoring this issue.

Number of direct and indirectly hired people working across the Buildcorp Group FY23:

**338**

Permanent Full-Time

**30**

Permanent Part-Time

**18**

Fixed Term Agreement

**22**

Enterprise Bargaining Agreement

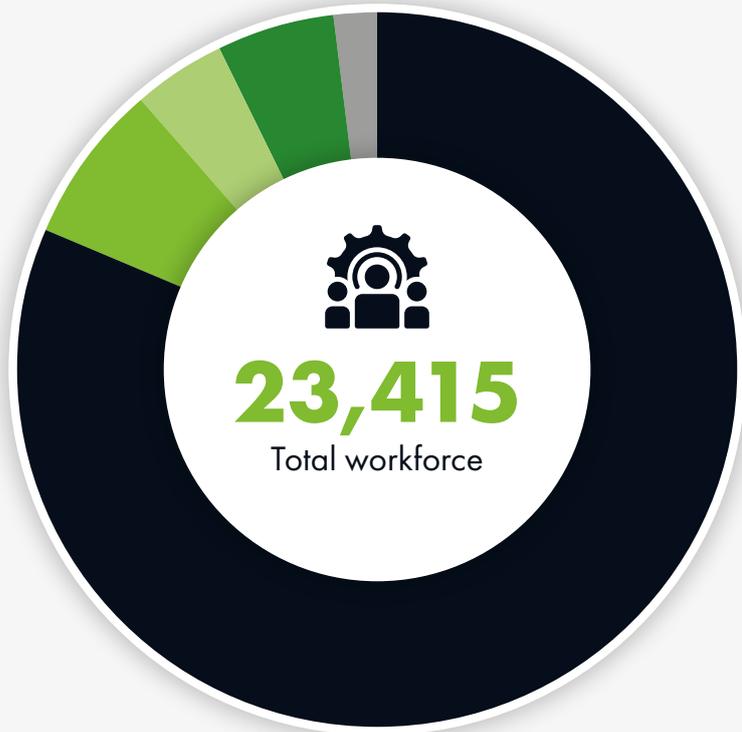
**7**

Casual

**+**

**~23,000**

Indirect Labour (Subcontracted)



# Risk of modern slavery in our supply chain

Construction has been identified as one of the sectors most prone to labour exploitation. Temporary workers in low-skilled and low-waged jobs can be present in both the industry workforce and in the supply chain for building materials. Globally, construction industry workers make up 18% of those subject to modern slavery.

## Life Cycle Assessment

In 2021, Buildcorp conducted a Life Cycle Assessment using the Social Hotspot Database to identify potential risks, both on and offshore, in our supply chain. Results indicated that 26% of Buildcorp's supply chain by spend carries a very high likelihood of modern slavery, 41% carries a high risk and 6% carries a low risk. We also identified the key categories of concern where the likelihood of modern slavery existed, including:



### Labour hire

Underpayment, indentured workers and exploitation of migrants in contracted and subcontracted services, such as demolition and cleaning.



### Mechanical equipment

Labour rights and health & safety in overseas supply chains of parts, equipment (in machinery, lifts etc.), engine or vehicle parts, and other manufactured goods, including metal products.



### Materials

Labour rights, health & safety, and human rights and governance in the overseas supply chain of construction materials, such as timber, plastic, glass, cement, gypsum, hardware, metals, tiles, textiles, brick, stones and sand.



### Electronics

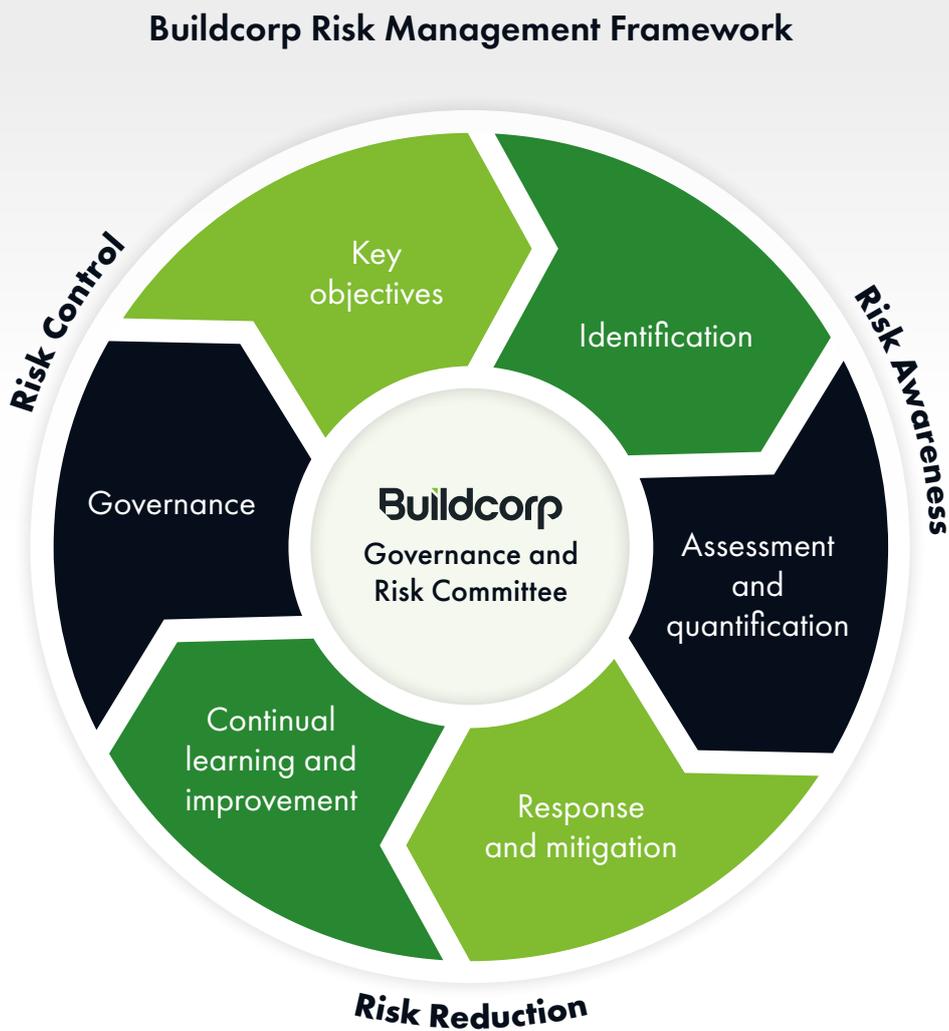
Labour conditions and health & safety in overseas electronics supply chains, particularly child labour.

As these are usually hidden risks. However, by cross-referencing our spend by category against likelihood, we have been able to better distinguish and prioritise risks and opportunities to ensure our collective compliance on Buildcorp projects.

# How we prevent and mitigate the risk of modern slavery

## Governance

The Buildcorp Governance and Risk Committee is responsible for overseeing modern slavery, governance and risk. Our Modern Slavery Management Framework has been developed by the Committee to prevent, detect and respond to incidents of modern slavery abuses in our operations and supply chain. This Framework is underpinned by policies and procedures, which are reviewed annually to ensure compliance with the Act.



**Policies**

The following policies and procedures outline Buildcorp’s approach to managing risk in relation to modern slavery:

Policy	Purpose
<b>Supplier Code of Conduct</b>	Sets Buildcorp’s minimum standards for the conduct of our subcontractors and suppliers in the areas of labour, human rights, integrity, ethics, health, safety, environment and tax compliance.
<b>Ethical Business Conduct Policy</b>	Provides guidance on the expected behaviour of all Buildcorp employees. Details Buildcorp’s zero-tolerance to any form of bribery or corruption as we conduct our business and operations.
<b>Responsible Procurement Policy</b>	Details Buildcorp’s commitment to respecting the human rights of every person involved in our operations, supply chain and communities.
<b>Whistleblower Policy</b>	Provides a reporting framework through which Buildcorp employees, subcontractors, suppliers and members of the public can report instances of actual or suspected unethical or unlawful conduct, without fear of reprisal.

**Due diligence and management controls**

Buildcorp encourages a collaborative approach as we work with project partners and suppliers to implement risk mitigation measures in our supply chain. We recognise that due diligence enquiries with our subcontractors and suppliers are the single most important step we can take to avoid, identify and remediate instances of modern slavery in our operations and supply chain.

Given this, we:

- ▶ Issue a modern slavery self-assessment questionnaire (SAQ) to be completed prior to any appointment as a supplier or subcontractor
- ▶ Include modern slavery questions in our pre-tender interviews
- ▶ Conduct compulsory online modern slavery training for all Buildcorp employees
- ▶ Include modern slavery issues and what to look out for in our onsite inductions
- ▶ Have clear site and office signage promoting whistleblower details and signs of modern slavery
- ▶ Review and update our policies and procedures each year to take into account any new trends or understanding of modern slavery



## HOW WE PREVENT AND MITIGATE THE RISK OF MODERN SLAVERY (continued)

### Reporting human rights concerns

Buildcorp has a whistleblower mechanism that allows employees, subcontractors, suppliers, clients, and members of the public to report instances of actual or suspected modern slavery associated with the company's operations. No concerns were reported or raised during the FY23 reporting period.

### Response and remedy framework

In 2022, Buildcorp adopted the recommendations and framework of the Minderoo Foundation Walk Free initiative and the Human Rights Resources and Energy Collaborative's, Modern Slavery Response & Remedy Framework. We continued to apply this framework in FY23.



Source: Modern Slavery Response & Remedy Framework: Minderoo Foundation Walk Free initiative and the Human Rights Resources and Energy Collaborative, 2022

In adopting this model and its recommendations, Buildcorp's response will depend on our relationship to the harm – that is, whether we have caused, contributed to or are directly linked to the harm.

<b>Cause</b>	A company causes harm when its activities (or omissions) in and of themselves result in harm. For example, if Buildcorp uses forced labour.
<b>Contribute</b>	A company contributes to harm when its activities significantly facilitate, enable, or incentivise a third party to cause harm. For example, if Buildcorp engages a low-cost cleaning contractor to service staff accommodation that does not pay their workers adequately.
<b>Directly Linked</b>	A company is directly linked to harm caused by a third party if the harm is directly linked to its products, services, or operations through its business relationships. For example, if Buildcorp purchases components from a supplier that exploits its workers.

# Measuring the effectiveness of our modern slavery framework

## FY23 Progress

We have made progress on most of the key actions identified in our 2022 Modern Slavery Statement. The principal focus during FY23 was to develop and implement a digital Track & Trace platform within the business. This initiative is ongoing, with embedding the platform continuing throughout FY24.

Key actions	Progress	Detail
Continual improvement of our modern slavery awareness training for Buildcorp employees.	Ongoing	Site managers and supervisors have all completed additional face-to-face training so they can deliver modern slavery training through our on-site induction process. A modern slavery section has also been included in our site induction pack. Signage highlighting the risk of modern slavery, what to look out for, and how to report it is posted in all our work sites and offices.
Implement Modern Slavery 2023 Survey managed by Trace SCI to conduct traceability studies for our supply chain.	Ongoing	Issued invitations to our top 254 suppliers to participate in supply chain tracing. <ul style="list-style-type: none"> <li>▼ 138 commenced or completed</li> <li>▼ 116 that have not started</li> <li>▼ 2 declined to participate citing they are not required to reveal their suppliers to us under the Act</li> <li>▼ 1 x 2-pillar SMETA audit undertaken by QIMA facilitated by Trace SCI</li> </ul>
Train our project teams to conduct traceability studies on active suppliers that have been identified as high-risk based on the product category and spend.	In progress	We identified 282 Australian-based suppliers, across Tiers 1-3 within our supply chain: <ul style="list-style-type: none"> <li>▼ 40 in Asia</li> <li>▼ 10 in Europe</li> <li>▼ 7 in North America</li> </ul>
Provide our suppliers with the tools and knowledge to participate in our traceability studies.	In progress	
Adapt our supplier onboarding to include compulsory Modern Slavery assessment for major procurement contracts (>\$2m contract values).	In progress	
Commence the introduction of modern slavery compliance ratings in our project performance review process for major procurement contracts (>\$2m).	Not commenced	
Continue to collaborate with industry peers in areas where a joint approach will have the most impact.	Not progressed	Despite continued communication, competing priorities within the Group prevented us from coming together in FY23.

## Case Study

# Track & Trace on GRC panels

In FY23, in our role as a Tier 2 builder in the refurbishment project at 477 Pitt Street, Sydney, Buildcorp provided IPST Super Property with a modern slavery risk assessment of the supply chain for the GRC panels featured on the exterior of the building. Buildcorp leveraged proprietary technology and Trace Supply Chain Intelligence Pty Ltd industry experience in partnership with Unchained Solutions Pty Ltd, who also assessed the processes, timeframe and third-party service providers required to filter through layers of intermediaries to access and identify:

- ▼ Manufacturing source: Geo-position
- ▼ Raw material suppliers: Geo-position
- ▼ CSR Accreditations of Manufacturers and material suppliers
- ▼ Environmental accreditations suppliers hold

Applying the Tier methodology of the Property Council of Australia (of which ISPT Super Property is a member), it was determined that the supply chain relating to the GRC panels includes:

- ▼ Tier 2 Buildcorp (Installer)
- ▼ Tier 3 Cara Facades (Trading Agent)
- ▼ Tier 4 Hebei Longteng (GRC Manufacturer)
- ▼ Tier 5 AluAone (Aluminium struts, inner frame supplier)
- ▼ Tier 5 Yinshan white cement (Materials supplier)

Of these companies, Hebei Longteng was found to hold no CSR or ISO accreditation standards. Buildcorp therefore engaged Cara Facades (the trading company representing Hebei Longteng) to participate in a CSR audit based on SEDEX Standards. The 2-pillar SMETA was facilitated by Buildcorp's Trace SCI Service partner, QIMA.

A corrective Action Plan was issued for the 9 sections of assessment with 32 non-compliance issues identified. Subsequently, in addition to SMETA 2-pillar CSR accreditation, Hebei Longteng has obtained ISO9001 accreditation.

The decision by ISPT Super Property to select the GRC panels as the case study subject was invaluable to Buildcorp as a case study in modern slavery supply chain traceability and transparency best practice.

In FY23, through Trace SCI, Buildcorp conducted a deep dive risk assessment with 254 suppliers adopting a similar reporting framework.



# Continual improvement



## FY24 Action Plan

In FY24, we will build on the progress we have made to date, continuing to engage and educate our suppliers about modern slavery and operationalise our current processes to manage and report on modern slavery risks.

Our 2024 Action Plan also includes:

- ▶ Enhancing our policy portfolio, including developing a Modern Slavery Policy and Procedure and Whistleblower Policy and socialising them throughout the organisation
- ▶ Developing an Impact Measurement Framework with key metrics to measure the effectiveness of our actions to address modern slavery
- ▶ Continuing to collaborate with Building Consortium members in areas where a joint approach to identifying the risk of modern slavery will make the most impact (post July 2024)
- ▶ Conducting further traceability studies (post July 2024)



# Consultation

## Approach

We undertake a Group-wide approach to managing modern slavery risk within our business and supply chain. All reporting entities listed below are embedded within our program of work. Regarding our modern slavery response, all business units within the listed entities are addressed by a whole-of-Group function. Our policies, procedures and practices are applicable to the entirety of Buildcorp Holdings.

## Approval

This Statement has been prepared by Buildcorp Holdings Pty Limited ABN 51 140 508 685 and applies to its wholly owned entities:

- ▼ Buildcorp Group Pty Limited ACN 091 336 168
- ▼ Buildcorp Infrastructure Solutions Pty Limited ACN 099 362 286
- ▼ Buildcorp Contracting ACN 003 922 825
- ▼ Buildcorp Interiors Pty Limited ACN 073 932 788
- ▼ Buildcorp Securities and Investments Pty Limited ACN 055 880 585

This Statement has been developed in accordance with the requirements of the Modern Slavery Act 2018 (Cth) (the Act). It describes how Buildcorp has addressed modern slavery risks in our in the year ended 30 June 2023.

This Modern Slavery Statement was approved Tony Sukkar AM, the Sole Director and governing body of Buildcorp Holdings, who is the responsible member as defined by the Act:



**Tony Sukkar AM**  
Sole Director & Managing Director  
Buildcorp Holdings Pty Limited

13 December 2023



# Appendix A

This table shows how our 2023 Modern Slavery Statement aligns with the mandatory criteria.

A Modern Slavery Statement must, in relation to each reporting entity covered by the statement:

Requirement	Addressed under
(a) identify the reporting entity; and	Structure, operations and supply chain
(b) describe the structure, operations, and supply chains of the reporting entity; and	
(c) describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities that the reporting entity owns or controls; and	Risk of modern slavery in our business
(d) describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes; and	How we prevent and mitigate the risk of modern slavery Continual improvement Case Study: Track & Trace GRC Panels
(e) describe how the reporting entity assesses the effectiveness of such actions; and	Measuring the effectiveness of our Modern Slavery framework
(f) describe the process of consultation with: <ul style="list-style-type: none"> <li>(i) any entities that the reporting entity owns or controls; and</li> <li>(ii) in the case of a reporting entity covered by a statement under section 14—the entity giving the statement;</li> </ul>	Consultation with reporting entities
(g) include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Refer to our Policies section for links to all relevant documents.

## New South Wales

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**Buildcorp**