

## HUMAN RIGHTS & MODERN SLAVERY - POLICY & STATEMENT

### Modern Slavery Policy

Probuild Constructions (Aust) Pty Ltd (**Probuild**) does not condone modern slavery in any of our business dealings. Probuild has a commitment to conduct its business and all its relationships based on integrity, and protect and uphold fundamental human rights in all of its undertakings.

Modern slavery is a crime and exploitation of fundamental human rights where victims can't refuse or leave. It takes various forms, including:

- slavery, servitude (coercing someone to provide services) and forced and compulsory labour;
- human trafficking (arranging or facilitating the travel or movement of a victim with a view to them being exploited);
- committing any offence with the intention to commit human trafficking;
- debt bondage, child labour, forced marriage and deceptive recruitment;
- aiding, abetting, counselling or procuring any of the above offences,

all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

To this end, we will:

- comply with the requirements of the *Modern Slavery Act 2018 (Cth)* (*Modern Slavery Act*);
- respect diverse cultures and not tolerate harassment or discrimination
- respect that all people have a right to reasonable work conditions.

In addition, our activities will be guided by:

- The International Bill of Rights (including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights); and
- The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work (which contains the eight core conventions of the ILO, including freedom of association and forced labour convention).

## Policy Commitment.

This Policy applies to all directors, officers, employees and business partners, including joint venture partners, consultants, subcontractors and suppliers of Probuild. This Policy should also be read in conjunction with Probuild's Code of Conduct, which serves as a guide for how to conduct yourself as a member of the Probuild team.

To ensure commitment to the Policy, Probuild has implemented measures designed to prevent and detect modern slavery within its business and supply chain, including:

- a policy which articulates Probuild's commitment to prevent violations of the Modern Slavery Act 2018 (Cth) (**Modern Slavery Act**), within its operations and supply chain, being this Policy;
- communication of this Policy and all relevant elements of the program to all employees throughout the Company and to our business partners;
- the assessment of modern slavery and human trafficking risks within Probuild and its supply chain and the development of effective, efficient and transparent controls to reduce and eliminate exposure to those risks;
- the adoption of compliance wording contracts;
- the adoption of appropriate due diligence and risk management processes on business partners, including joint venture partners, consultants, subcontractors and suppliers, coupled with a requirement that they implement procedures which incorporate the principles of the Modern Slavery Act
- training of all relevant individuals throughout the company so that compliance with its policies and procedures is the duty of all relevant employees at all levels to ensure that individuals can recognise modern slavery practices and take steps to avoid the same.

Probuild is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery and human trafficking throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act, including the Modern Slavery Statement.

## Modern Slavery Statement

### About Probuild

Probuild Constructions (Aust) Pty Ltd (**Probuild**) is a tier one national builder. Probuild is recognised for its experienced delivery teams, innovative construction strategies and efficient delivery. Founded in Victoria it has offices in Melbourne, Sydney, Perth and Brisbane.

Since it was founded in 1987 Probuild has focused on delivering commercial and residential projects safely, within budget and programme expectations for its clients. In doing this, Probuild recognises the importance of protecting human rights and is committed to protecting the rights of all people, including employees, those within its supply chain, and the communities in which it operates.

## **Potential Modern Slavery Risks**

One of the potential risks facing Probuild is the existence of modern slavery in its supply chain. This is reflected by the fact that Probuild has a global supply chain. Through Probuild's due diligence and risk assessment practices, Probuild ensures that it and its business partners (including joint ventures, consultants, subcontractors and suppliers) are not involved with modern slavery.

One of Probuild's key focus areas in our Corporate Social Responsibility 2020 Strategy is to play a lead role in modern slavery prevention. In doing this we will establish a due diligence and audit tool at all levels of our supply chain and roll out the audit tool to our supply chain for their implementation. We are also establishing a focus group to collaborate and promote modern slavery with the industry.

## **Modern Slavery Due Diligence and Risk Assessment**

Probuild provides safe and fair working conditions for all its employees in accordance with applicable awards and the fair work legislation.

Probuild has policies which embed the importance of the right to expect to be able to work in a place that is inclusive, respectful and fair. Probuild strives to create a work environment which is inclusive of all people regardless of gender, age, race, disability, sexual orientation, cultural background, religion, family responsibilities or other areas of potential difference. Probuild expects the same standards from all of its subcontractors, suppliers and other business partners.

Prior to the engagement of any of its subcontractors or suppliers, Probuild completion of a questionnaire to confirm they have practices in place, within their business, to ensure the prevention of modern slavery. This questionnaire acts as a risk assessment for subcontractors and suppliers prior to contract award. A subcontractor/supplier will only be engaged if it has passed this comprehensive risk assessment.

Through contractual arrangements and procurement principles, Probuild's subcontractors and suppliers are required to comply with Probuild's Code of Conduct and Modern Slavery Policy. Additionally, Probuild requires its subcontractors and suppliers to sign a statutory declaration (or equivalent) confirming that they have not engaged in modern slavery acts, representing an additional commitment to work with Probuild.

Additionally, where Probuild is directly engaging international suppliers, it ensures it visits the suppliers' overseas factories at regular intervals to ensure due diligence requirements are being met. As a socially responsible corporation, Probuild's role put simply is to ascertain where modern slavery exists, find it, then stop it.

## **Assessing & Reporting**

Probuild has a number of mechanisms for employees and third parties to anonymously report suspected or actual illegal activity or breaches of Company Policies, including Probuild's Code of Conduct and Modern Slavery Policy. Employees and third parties are able to utilise Probuild's Whistleblower Policy to ensure protected disclosure, this can be done by phone or email. Each Whistleblower disclosure received is investigated in accordance with Probuild's investigation policies.

In order to assess grievances, Probuild measures the number of people who use Probuild's grievance mechanisms and the nature of their grievance, including its employee assistance

# PROBUILD | Policy & Statement

programme. Probuild also regularly engages with our stakeholders to understand their expectations about our performance.

Probuild is committed to continuous improvement and recognises it is on a journey to improve modern slavery risk identification and mitigation. Probuild will continue to track and publicly report on progress annually in its Board Reports.

*This statement applies to all companies wholly owned by WBHO Australia including Probuild, Monaco Hickey Pty Ltd and WBHO Infrastructure Pty Ltd.*



.....

LUKE STAMBOLIS, Managing Director

1 July 2020