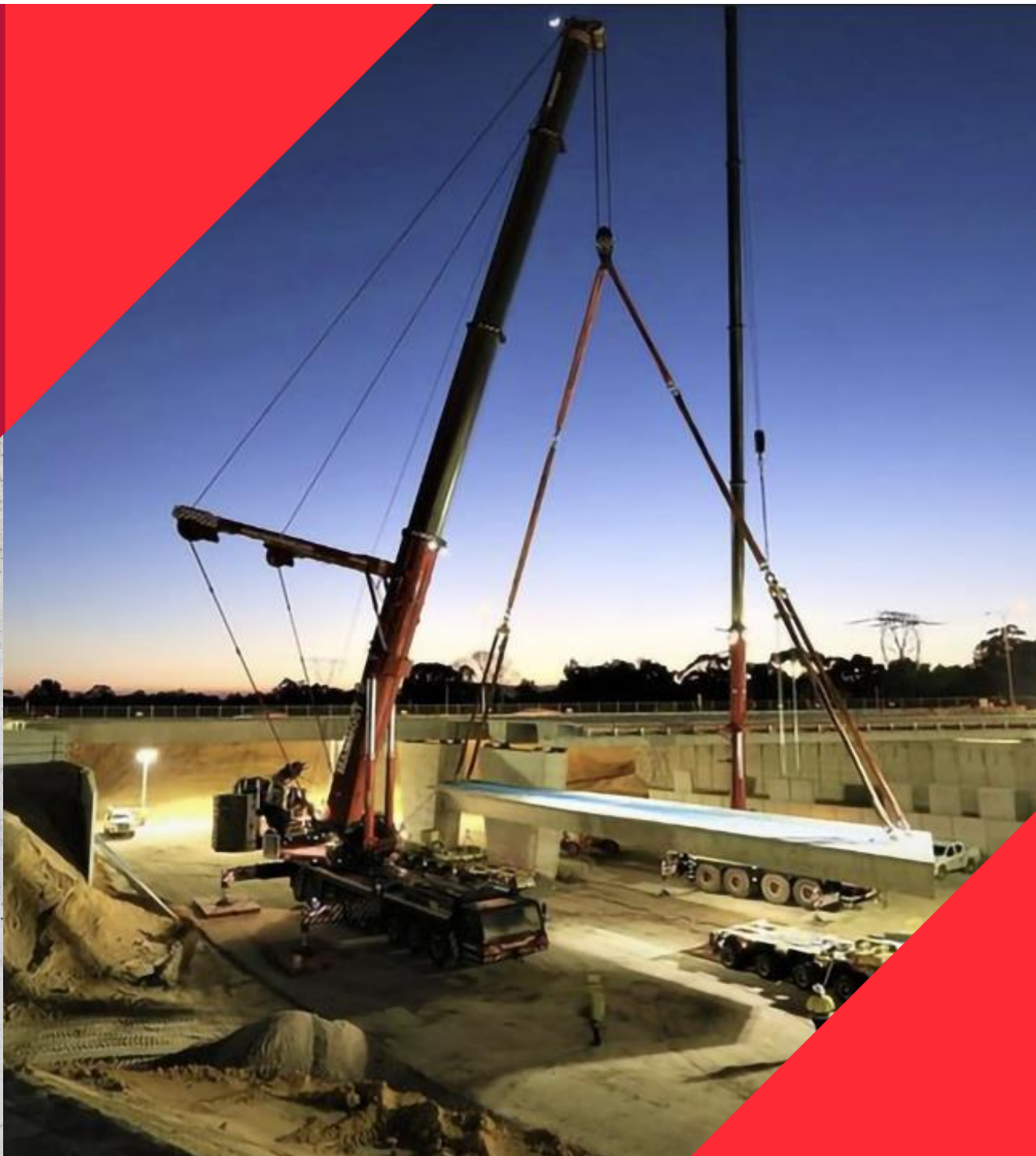


**Georgiou Group Pty Ltd**  
Modern Slavery Statement

2022-2023



## The best people to work with.

Our brand is a result of our *Georgiou Way* culture. We never compromise on safety or reputation. We pride ourselves on securing repeat work with our clients and consultants. The *Georgiou Way* is the collection of our values which guide the success of our business. They are our beliefs and the way we do business- including how we manage risks and engage with our stakeholders and each other.

To be *'the best people to work with'*.

This is the Georgiou Group Pty Ltd.'s (Georgiou) statement pursuant to the *Modern Slavery Act 2018* following Georgiou's review of its supply chains and operations in compliance with reporting obligations under the Act for the financial year ending **30 June 2023**.



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# 1 Reporting Entity

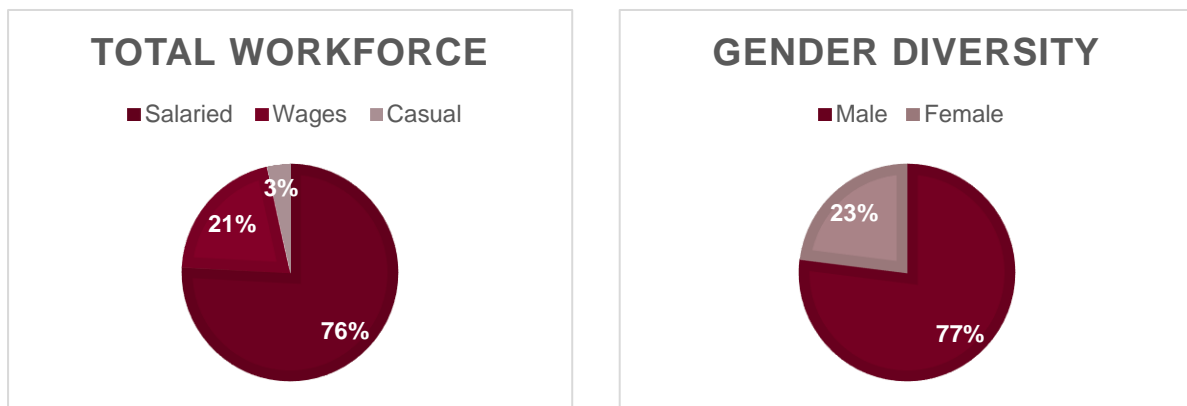
This Statement has been prepared and submitted under section 13 of the *Modern Slavery Act 2018* (Cth) by Georgiou as a single reporting entity. This Statement will detail the strategies in place within Georgiou and its subsidiaries to continue to identify and prevent any potential modern slavery activities within its operation and supply chain.

Georgiou remains committed to identifying and mitigating any risks associated with modern slavery practices in our supply chains and operations. We strive for sustainable growth through responsible business practices and require the same of our subcontractors and suppliers through our network of partners delivering our projects throughout Western Australia, Queensland, New South Wales, and the Northern Territory.

# 2 Structure, Operations and Supply Chain

## 2.1 Structure

Georgiou Group Pty Ltd (Georgiou, ABN 82 073 851 948) is an Australian Private Company domiciled in Australia with its registered office in Western Australia. Georgiou is 100% Australian owned, was established in 1977 and is today one of Australia’s leading privately owned construction companies. Georgiou has continued its path of growth over this reporting period, and at the end of the 2023 Financial Year Georgiou had approximately 919 directly engaged employees, with 88% of those engaged on a permanent basis.



## 2.2 Operations

Georgiou commenced its operations in 1977 as Direct Drainage, expanding in 1993 to start a precast company called Geocrete, and further in 1994 with the acquisition of Roadpave. In 1996, the three companies merged to become Georgiou Group. Today we are a national civil and building construction company with offices in Perth, Darwin, Gold Coast, Brisbane, and Sydney. In the civil sector, we provide contracting services predominately to the transport (road and rail) and urban development markets, while in the building sector we service the commercial, health, requirement and aged care, education, and industrial markets.

While our operations are limited to Australia, Georgiou understands the inherent risks of modern slavery practices that can arise in the construction industry through its’ supply chain and local operations with exploited workforces.

Georgiou is predominately engaged in the construction of road, building and infrastructure projects, as well as the development of capital projects. All executed head works contracts are with clients who are domiciled and based in Australia. Approximately 68% of Georgiou's work in hand is through State Government entities and a further 7% for Local Government entities, therefore 75% Government and 25% for private clients. Georgiou is also engaged in a number of joint ventures with other Tier 1 and Tier 2 contractors within Australia and is an alliance partner on a number of infrastructure projects with State Government clients.

## 2.3 Supply Chain

The performance of Georgiou's diverse supply chain plays an integral role in our success. *The Georgiou Way* sets out our company values that define how we do business, both internally and externally, and is vital towards achieving our vision. One of our key values is Relationships- we build lasting relationships through trust and performance. We work closely with our supply chain to ensure they comply with all applicable legislative and regulatory requirements as well as actively sharing our Georgiou values.

Georgiou's supply chain continues to consist almost exclusively of Australian entities. This reflects Georgiou's commitment to supporting its local and national economies to the maximum extent possible, as well as providing Georgiou with greater oversight and ability to manage any risks associated with the performance of our supply chain. During this reporting period Georgiou has, once again, only contracted directly with one overseas entity for the provision of outsourced administrative services, which makes up approximately 0.05% of its total spend.

Our contractual arrangements with our suppliers include ad-hoc transactional purchase orders pursuant to our standard Georgiou terms, as well as project specific supply subcontracts and longer-term master agreements which have been negotiated to apply throughout the business. At the end of this reporting period Georgiou had 1847 active companies in its supplier network and approximately 1239 subcontractors engaged to deliver construction requirements during the preceding 12 months.

Several Georgiou vendors source components of their works from overseas entities at some point in the supply chain. The nature of the work Georgiou performs can be complex and technical, which results in varied supply chains sourcing limited or niche products or services.

## 3 Risks of Modern Slavery Practices in Georgiou's Operations and Supply Chain

We are cognisant at Georgiou that no region of the world is spared from forced labour, and that most of this occurs in the private economy, with construction identified as one of the five sectors accounting for the majority of adult forced labour (Global Estimates of Modern Slavery 2022).

The industries we operate in within Australia are heavily regulated through both Federal and State legislation, including industrial relations, work health and safety and human rights laws, and Australia has been assessed as having a very low prevalence of modern slavery according to the Global Slavery Index 2018. While we have assessed the potential for modern slavery within our own operations as low, with no practices that we have caused or contributed to, Georgiou is aware that the potential remains for modern slavery to exist further down our supply chains through indirect suppliers of raw materials and equipment.

### 3.1 Procurement

In our 2022 report we identified supply components which were sourced by Georgiou through the supply chain that had higher risk elements for modern slavery practices. These remain a potential risk during the 22/23 financial year and will require ongoing vigilance given their significance in our

operations. These supply components include:

- Structural and reinforced steel;
- Plant and equipment;
- Building components including roofing, elevator and façade systems and fixings; and
- Manufactured technical components including electronic equipment.

Whilst Georgiou continues to source these products in their final forms from Australian suppliers contracted directly, manufacturers of individual components or entities involved in the mining and processing of raw product are often based overseas. These supply chains can be complex, consisting of a multitude of inputs from raw material extraction, processing, production, assembly, and logistics. Long supply chains and transparency past the first level of the chain pose an ongoing challenge in understanding the risk embedded outside of the entities with which we engage directly.

## 3.2 Personnel and Operational Practices

Georgiou continues to take a risk-based approach to identifying any potential practices that are causing, contributing to, or directly linked to modern slavery practices, and understanding our areas of vulnerability. We review the following criteria when assessing and identifying high-risk areas in our operations and supply chain:

- a. Geographical risks in sourced materials.
- b. Vulnerability of workforce population; and
- c. High risk industries and business models.

Georgiou maintains stringent people controls throughout our operations including within our governance framework of policies and procedures, as well as our human resource and recruitment practices as detailed in section 4.

## 4 Actions taken by Georgiou to Assess and Address the Risks

Georgiou has maintained its continuous improvement approach to reviewing and developing its systems and processes to combat any risk of modern slavery practices within our business. We have consolidated the changes made during the previous period and continue to review and develop these to ensure a robust integrated framework of governance, systems, processes, and culture to eradicate modern slavery risks from our operations and supply chains.

### 4.1 Procurement Strategy

We have continued our stringent approach to due diligence within our procurement practices, through our established procurement procedure. Georgiou has further developed the existing procurement mechanisms as follows:

- i. Refinement of our pre-qualification process with our Vendor Precontract Assessment which includes a mandatory modern slavery questionnaire to identify whether vendors are assessing modern slavery risks within their own organisations and the mechanisms they have in place to identify and action any modern slavery risks. This assessment is completed where a new

vendor is sourced and thereafter every 3 years for existing vendors.

- ii. Further review and amendment to our suite of standard subcontract agreement templates to ensure its alignment to the current Modern Slavery Act, as well as requiring a warranty from our subcontractors for compliance with the Act at all times. Our subcontract agreements also contain several positive obligations for the subcontractor in relation to modern slavery risk management, including:
  - a. Ensuring its sub-subcontractors and supply chains' compliance with the Act;
  - b. An obligation to take all reasonable and necessary steps to identify, investigate and eliminate modern slavery in its operations and supply chains;
  - c. Provision of information and assistance required by Georgiou to enable our own compliance under the Act; and
  - d. Notification obligations to Georgiou in the event it becomes aware of any modern slavery breaches within its organisation or supply chain.
- iii. Georgiou has continued to review our high value and/or high-risk vendors, extending this review to capture vendors with a total spend of upwards of \$400k during this reporting period, as further detailed in item 4.4.

## 4.2 Training

Georgiou has developed an extensive Commercial Acumen training suite which has been rolled out across the organisation throughout the reporting period. The training suite is delivered on a continuous rotation which consists of 10 commercial specific packages, including the procurement lifecycle which details our due diligence requirements for all forms of procurement throughout the organisation. This training is being delivered in-house across all roles within the organisation which have input into any stage of the procurement process.

## 4.3 Employment Practices

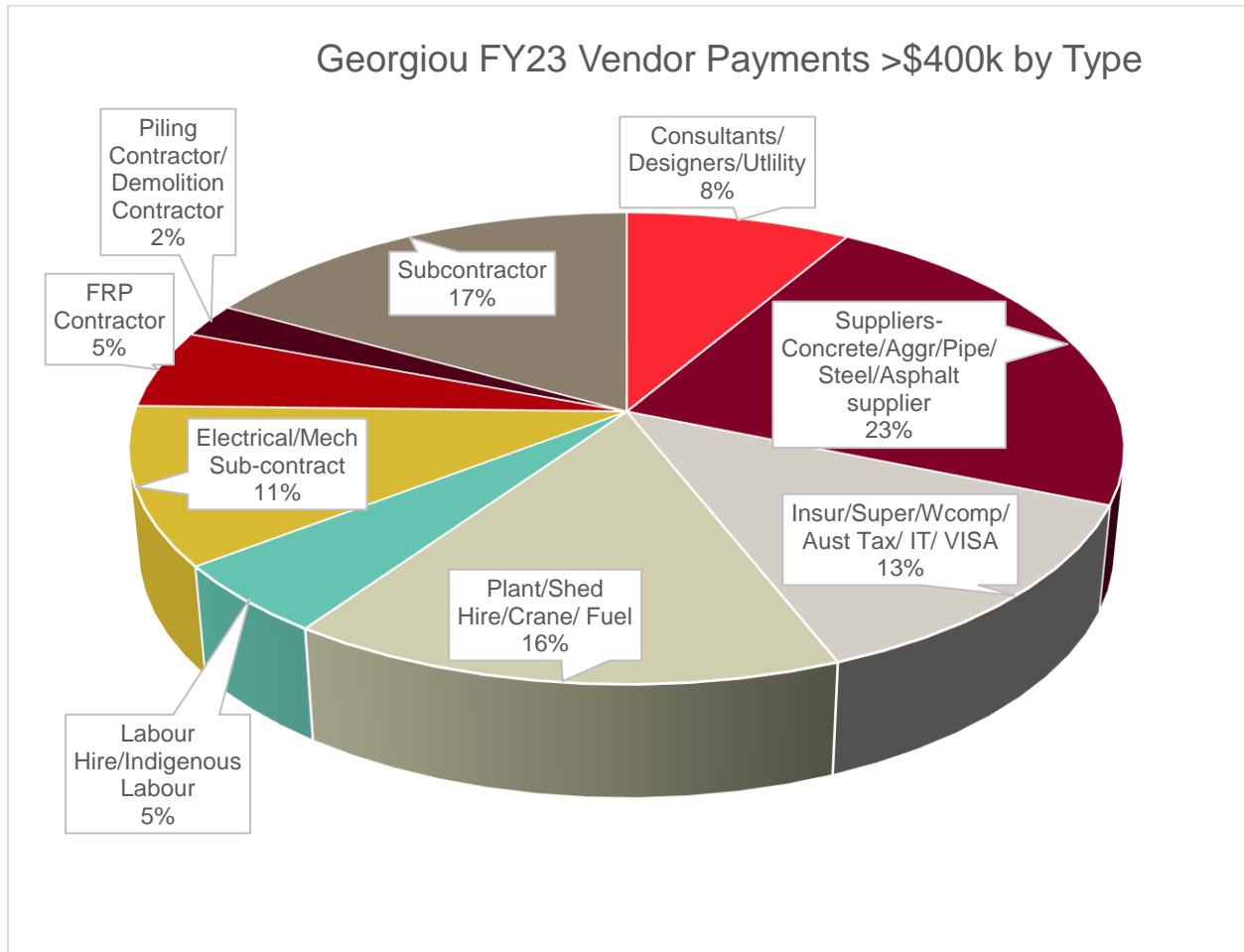
Georgiou has well established human resource and recruitment processes and practices to ensure we uphold our vision to be 'the best people to work with' and mitigate any potential susceptibility to modern slavery practices. Our recruitment process involves comprehensive employment checks to ensure all prospective employees hold the required working rights for their employment within Australia. Our Induction and Orientation Procedure sets out core training required to be completed by all new employees within 4 weeks of their commencement, including awareness of Georgiou's Code of Conduct.

Georgiou has implemented a Diversity Committee for the promotion of diversity initiatives, with dedicated Diversity Champions who perform contact roles within the organisation to promote and encourage an inclusive workplace culture. The initiatives driven through this committee include annual pay equity audits and the delivery of quarterly organisation-wide toolbox meetings to address key issues such as Georgiou's equal opportunity and anti-bullying policies and processes and providing information in relation to grievance resolution and where to access support or advice.

As part of our ongoing commitment to equitable remuneration practices, Georgiou obtains an external independent review of our current remuneration practices with a specific focus on gender equity for pay parity each year, as well as reporting against the Workplace Gender Equality Act statutory obligations. We can confirm Georgiou has received its Certificate of Compliance for the last reporting period (current report is awaiting review) and for the fifth consecutive year has pay parity between males and females.

## 4.4 Supply Chain Analysis

Georgiou previously implemented a yearly audit schedule against key and high-risk vendors to progressively address any potential for exposure to modern slavery in its business and supply chain. In this reporting period we have extended this review further to capture a broader range of vendors. During our supply chain analysis, we reviewed all vendors and grouped these by type to give us a snapshot of risk areas, which are represented in the graph below:



As a result of the analysis of our supply chain, Georgiou identified that its' top ten subcontractors and suppliers by spend account for approximately 22% of its overall spend on vendors. Most of these vendors are large, Australian based companies who provide materials sourced from within Australia or the provision of labour and services including subcontractors who are completing discreet scopes of work on our projects.

During this reporting period Georgiou again identified high value and high-risk vendors (such as those operating and based overseas) for review to identify any potential exposure in their supply chain network, as well as nominating their policies and procedures to mitigate risk of modern slavery and the course of action if such risks are identified.

Once again Georgiou has only engaged with one overseas-based entity through the reporting period who provide outsourced administrative services from the Philippines. Georgiou has executed a contract which requires this entity to engage employees within the relevant laws of the Philippines and ensures pay and conditions are better than the required minimum standards in their country of origin. This supplier has its' detailed Modern Slavery Policy in place which outlines the perceived risks within its organisation, how it manages its risks of modern slavery practices and provides for disciplinary action for breaches of the policy, applicable to their own organisation as well as their supply chain.



Aside from this outsourced administrative contract, we again found the significant majority of entities that we engage with employ labour and source their materials from within Australia, with no evidence of any goods or services procured from overseas suppliers who had not been thoroughly vetted for modern slavery practices. All entities reviewed screen suppliers to assess modern slavery risks and have some form of ethical sourcing process which ties into their procurement and subcontractor management processes.

## 4.5 Corporate Governance

We operate within an established corporate governance system with its foundations in our collection of values and principles known collectively as *The Georgiou Way*. Policy and governance is set by the Board of Directors and Executive team, which includes our Chief Risk Officer and Shared Services Executive General Manager (encompassing Human Resources). The suite of policies relevant to identifying and preventing modern slavery risks and practices within our organisation includes the following:

- Workplace Discrimination Policy which expressly includes provision that “Georgiou does not employ forced, bonded or child labour”.
- Sustainability Policy- Georgiou remains committed to a culture of sustainability and manages its operations to minimise environmental and social impacts while integrating sustainability principles and practices into the business, with sustainable objectives and targets established within the organisation.
- Code of Conduct which applies to all Georgiou employees, subcontractors, suppliers, and consultants. All parties to this Code of Conduct are expected to act consistently with fundamental Georgiou values, ethical behaviour and accountability and transparency in our conduct, with protections against conflicts of interest and bribery in our business and supply chain.

## 4.6 Whistle-blower Hotline

The Georgiou Whistle-blower Hotline is an independent and confidential service available to all employees, contractors, and stakeholders to receive information relating to improper conduct, unlawful or unethical behaviour and supports Georgiou’s values, principles and Code of Conduct. Georgiou has appointed Stopleveline to facilitate the hotline and is committed to the protection of whistle-blowers against action taken in reprisal for the making of protected disclosures.

Stopleveline enables parties to report suspected misconduct via phone, email, internet, or mail and is available on a free of charge 1300 number within Australia 24 hours a day, 7 days a week. Calls are answered by a Stopleveline investigator during business hours (Australian Eastern Standard Time), and otherwise responded to within one working day.

There were no reports made to the Stopleveline hotline regarding modern slavery or any other unethical or unlawful behaviours at Georgiou during the reporting period.

# 5 Measuring the Effectiveness of Georgiou’s Actions

This is Georgiou’s fourth report under the Modern Slavery Act, and we continue our focus on understanding the inherent modern slavery risks that may present themselves through our operations and the layers of our supply chain.

Building upon the previous reporting period key performance indicators, Georgiou has established the following framework to measure the effectiveness of our actions to identify, assess and mitigate the risks of modern slavery:

- i. Continue to conduct annual surveys of key high value or high-risk suppliers and subcontractors, expanding this further to suppliers and subcontractors who may sit outside the nominated spend cap but who are identified as having extended supply chains, to enable us to understand and take appropriate action on any modern slavery risks within subsequent layers of our supply chain. A sample size of 20 vendors with extended supply chains will be randomly selected initially for a detailed review.
- ii. Review and update our standard procurement pre-contract suite of documents to ensure alignment to the current Modern Slavery Act obligations and ensure assessment on modern slavery risk mitigation and management is included as part of the tender non-price assessment review process.
- iii. Continue to monitor the Stopleveline whistle-blower hotline for any modern slavery concerns reported, and ensuring reports on complaints are dealt with appropriately and our investigation process is adhered to.
- iv. Finalise the company-wide training roll out on procurement due diligence and ensure an ongoing campaign of training for new starters and refresher training for existing personnel.

## 6 Consultation Process and Moving Forward

Georgiou Group Pty Ltd is a single reporting entity in accordance with the requirements of the Act, so mandatory reporting criteria six regarding consultation is not applicable to Georgiou. However, Georgiou's Leadership Team continues to ensure that all policies and procedures conform to legislative and regulatory requirements and are in accordance with the Georgiou Values & Principles.


The Leadership Team, through its delegated Business Unit leaders, have actively ensured all project and support staff understand the importance and implications of this Act on our business via these policies and procedures as standard operating practices. Project and support teams have cascaded these requirements onto our third-party vendors through our project documentation and via publication of our processes, policies, and our Modern Slavery Statement on our publicly accessible internet site.

Georgiou is committed to the continuous development and improvement of our policies and processes as they relate to modern slavery, with the support of the Board of Directors, the Executive team and cascaded through our organisation to the projects being completed. Our plans for action over the next reporting period and beyond as set out in this statement demonstrate our commitment to effectively identifying and addressing potential risks of modern slavery in our organisation and in our industry.

Our commitment to being '*the best people to work with*'.

It is on this basis that Georgiou's Board of Directors have reviewed and approved this statement prior to its submission.

This statement for the Financial Year 2022/2023 was approved by the Georgiou Group Pty Ltd Board of Directors.

DocuSigned by:  
  
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Gary Georgiou

**Chief Executive Officer**

*For Georgiou Group Pty Ltd*

People.  
Partnerships.  
Excellence.

