

woollam
SINCE 1884

Modern Slavery Statement

FY22



WORKING TOGETHER
SETS US APART

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Our policy

Woollam's Modern Slavery Statement outlines our approach and expectations to minimise the risk of modern slavery in our business operations and supply chain, ensuring we maintain ethical sourcing and are not inadvertently in breach of applicable legislation.

In accordance with Modern Slavery Act, Woollam is committed to operating responsibly by establishing and adhering to the highest ethical standards across our supply chain and that our contract partners and suppliers are not involved in forced labour, debt bondage, deceptive recruiting for labour services or any other facet of modern slavery. We will not tolerate any forms of slavery or human trafficking in our business and will support a framework to eradicate modern slavery in our sector.

Our Modern Slavery framework is overseen by the senior management members with oversight by the Woollam Board members. Our framework is evolving to ensure compliance with our obligations.

Our framework intent is to educate our business operations and contract partners to recognise, mitigate, manage and eradicate modern slavery as specified in the relevant legislation.

Our framework

Woollam is evolving its Modern Slavery framework to support the intent of Modern Slavery Act 2018. The foundation of the framework is based on policies and procedures which are underpinned by relevant legislation. Woollam Modern Slavery, Code of Conduct and Whistle-blower policies and procedures strengthen our procurement management framework which incorporates actions and requirements to mitigate the risk of modern slavery and is further emphasised by our principles of conduct and ethical standards for our employees, contract partners, suppliers and other stakeholders.

(TF Woollam & Son Pty Ltd ABN 94 009 676 064), in preparing our subsequent statement, senior management and Directors of Woollam have responsibility for the framework and compliance to the Act.

A message from our Directors

The strength of our company depends upon the strength of our Relationships - with our people, our clients, our contract partners, suppliers and the communities we partner with. We strive to make a positive impact to the communities in which we work. We're committed to working together to support fundamental human rights and helping to put an end to modern slavery.

Be consistent and always do what we say we are going to do. It's how we've built trust and growth; it's how we'll keep trust and it's how we'll continually improve as a business.

We have an amazing history and while we are incredibly proud of where we've come from, it is only a small part of who we are, what we're about, and where we need to be.

Whilst 2021 was incredibly challenging with COVID-19 pandemic, we continued to work together with our teams and contract partners to ensure their safety and wellbeing through engagement and open communications. We continue to work hard to preserve our genuine family values around people and that includes keeping everyone safe and fulfilling our obligations under the relevant laws and legislation.

Modern Slavery Act reinforces our shared commitments to ensure our business conduct and our supply chain partners conduct is ethical and aligned to the principles of the Modern Slavery Act. We will continue to engage and work to eradicate modern slavery risk and encourage our suppliers to report areas of concern.

The Board of Directors are the principal governing body of TF Woollam & Son Pty Ltd for the purpose of Modern Slavery Act 2018 (Cth). This statement has been approved by the Board for the financial year ending 2021. ⁽¹⁾



George Bogiatzis
Executive Director



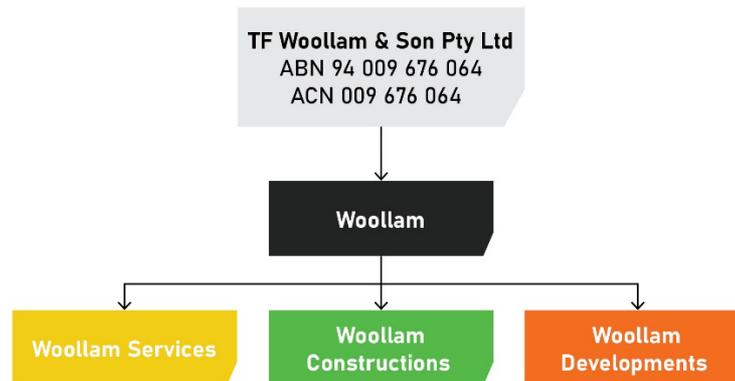
Craig Percival
Managing Director



Our structure, supply chains and reporting entities

Our structure and reporting entities

TF Woollam & Son Pty Ltd (Woollam ABN 94 009 676 064)⁽²⁾ is made up of three divisions, Woollam Constructions, Woollam Developments and Woollam Services.



TF Woollam & Son Pty Ltd company structure.

This statement includes TF Woollam & Son Pty Ltd and the three divisions in their control and therefore our approach and this statement to modern slavery within Australia is across all divisions of Woollam.

The senior management and managers are involved and work directly with the reporting entities in relation to modern slavery issues. The reporting entities collaboratively consulted in the development and endorsement of this statement which represents and reports to the Woollam Board.⁽³⁾

Currently the business has approximately 200 direct staff and upto 500 or more sub-contractors at any given time.

TF Woollam & Son Pty Ltd (Woollam) became a Building Code covered entity in September 2017. We recognise our obligations and responsibilities under the Building Code which includes, but not limited to:

- Australian Building and Construction Commission (ABCC) contract partner proof of Compliance
- Compliance with National Code of Practice for the Construction Industry and the Australian Government Implementation Guidelines
- Workplace Relations management plans outlining policies and processes relating to Dispute Resolution and Freedom of Association
- Contract Partner Declaration of Continued Compliance to Building Code

Our history



The Woollam story is unique in Australia's history. Established in 1884, Woollam is the country's oldest privately owned construction company and has helped power local economies, shape communities and left a mark on the architectural heritage of our towns and cities. We create, design, build and maintain legacies that will stand the test of time. Woollam is a 100% Queensland owned company. *The Woollam team, 1890.*

Our supply chains ⁽⁴⁾

Our Constructions, Services and Developments divisions utilise Australian-based professional services where possible (building contractors, surveyors, designers/architects etc) and sub-contractors (tilers, carpenters, concreters, electricians, plumbers etc). Our supply chains can be multi-tiered and with the COVID-19 pandemic, supplies have been predominately sourced locally across Australia and/or overseas if not available locally.

We source a wide range of goods and services necessary for our operations and use subcontract arrangements with other businesses.

From the risk assessments conducted of our workforce, operations and supply chains we have determined that our greatest potential risk exposure is within the construction supply chain. Albeit the probability of risk is low, we will apply the Modern Slavery principles to mitigate risk.

Our operations

Woollam's operations principally involve ⁽⁵⁾:

- Building and Construction
 - Create, design, build, construct and maintain private and public infrastructures across Queensland and New South Wales
- Facilities Maintenance including:
 - Central maintenance services
 - Single source management
 - Planned Preventative maintenance
 - Capital planning and Compliance
- Minor Capital Works and Insurance Works
 - Repair
 - Repurpose
 - Restoration, Remediation and Make-Safe
- Property Development and Property Management

To accompany our business operations, Woollam is committed to positively exercising our corporate social responsibility. Profoundly affecting the communities in which we live and work is a Woollam legacy. We empower our people and the people around us to initiate and participate in initiatives that make a difference and by continuing to “pay it forward” to those in need.

From building Queensland's only children's hospice, donating accessibility infrastructure to regional schools, trailblazing the outback to fundraise for health charities, to helping combat social isolation among seniors – Woollam whole-heartedly and actively embraces a philosophy of giving back.

Combatting Modern Slavery

Benefits of combatting Modern Slavery

We recognise there are many benefits to combating modern slavery, we are committed to evolving our modern slavery framework to eradicate modern slavery risks to achieve our intent, including increasing and safeguarding Woollam’s brand through effective and constructive sourcing in line with Modern Slavery Act principles

What Woollam has done

Woollam continues to assess and monitor our processes to determine effectiveness and eliminate any potential modern slavery risks in our operations and supply chains and act to mitigate those risks. To support our intent, we have:

| Actions | Details |
|---|--|
| 1. Adopted a Modern Slavery framework. | a. We have identified our greatest risk exposures b. Established governance process to provide the Board and senior management oversight |
| 2. Completed desktop audit of our top 50 suppliers and sub-contractors to identify any potential or likely risks in our supply chain. | a. We will continue to partner with our suppliers to ensure awareness and education on our shared obligations under the Modern Slavery Act 2018 |
| 3. Initiated Project PRIMO, Business Process Improvement framework to reset, refocus and re-energise the “Woollam Way”. | a. Ensure consistency and optimisation of work processes underpinned by relevant legislation and governance. b. Process changes incorporating Modern Slavery Act requirements will optimise operational excellence and process improvements include: <ul style="list-style-type: none"> • Contract partner and supplier pre-qualification; • Project purchasing assessment; • Declaration of compliance under the National Code of Practice for the Construction Industry and the Australian Government guidelines • Contract Partner Tender interview and Approval to Let process updated c. Updated internal processes will mitigate risk underpinned by Modern Slavery Act obligations |
| 4. Updated various Woollam policies and procedures to reflect our obligations under Modern Slavery Act 2018. | Updated documents include: <ul style="list-style-type: none"> • Whistle-blower Policy, • Code of Conduct, • Modern Slavery Policy Statement, • Equal Employment Opportunity Policy • Anti-Discrimination Policy |

| | |
|--|--|
| 5. Modern Slavery Act obligations training | <ul style="list-style-type: none"> • Employment Contract provisions in line with Fair Work Act • Contractor Agreements • Training of nominated managers in the principles of Modern Slavery Act |
|--|--|

What Woollam is planning

Woollam will continue to review our internal operations, suppliers and contract partners arrangements to make the necessary changes to mitigate risk of modern slavery entering our organisation supply chain.

The below outlines potential identified risks and their mitigation strategies. ⁽⁶⁾

| Risks | Mitigation strategy |
|----------------------------------|---|
| Supply chains | Continue to develop maturity of our Contract Partner selection, management and auditing including taking the Modern Slavery provisions into account. |
| | Conduct a deep assessment of identified supply chains (e.g. personal protective equipment and supply products) and taking the necessary action to tighten. |
| | Issue correspondence to all our supply chains informing them of our commitment to ensuring our business and supply chains are free from modern slavery. |
| | Issue correspondence to all our supply chains to provide awareness and encourage continuous improvement in their own capacity to manage modern slavery risks. |
| | Mitigate risk by asking our suppliers to complete a survey which identifies any potential risk within their supply chain. |
| | Continue to monitor our supply chains and review our governance frameworks i.e. policies and process to address and mitigate modern slavery risk. |
| Compliance and governance | Monitor and report to senior management and the Board on framework progress, actions, outcomes |
| | Identify ongoing compliance training including FAQs for new staff and contract partners engaged. |
| | Continue to evolve our Modern Slavery framework and governance through improved due diligence; mitigation through improving our processes and policies. |

Risks ⁽⁷⁾

Woollam continues to adopt a continuous improvement approach to addressing modern slavery risks within our operations and supply chains. We endeavour to build upon the initiatives and learnings to date and the future to address modern slavery risks across all our business services. We have assessed common high risks in our supply chain as potentially involving:

- Raw materials used in the construction process (includes tiles, cement, bricks, timber, glass, piping and steel and labour)
- Subcontractor arrangements in lower skilled occupations e.g. cleaning services; oversight of minimum conditions including human rights provisions,
- Product Services, e.g. personal protective equipment, uniforms

By applying due diligence processes for our contract partners and suppliers based on our review in line with the Modern Slavery risks identified; we will:

- Track and assess the effectiveness of the actions taken and outcomes of these actions
- Awareness and training for our employees, contract partners, suppliers re modern slavery risk
- Ongoing compliance to Australian laws and legislation, including Fair Work Act, and the Health and Safety Act.

Risk assessment strategies

Having adopted a continuous improvement approach to addressing modern slavery we recognise an assessment of risks relating to our contract partners and supply chains may identify:

- Inadvertent purchase of materials, products or equipment sourced via modern slavery practices
- The potential utilisation of low-skilled resources (vulnerable minority groups) by subcontractors and their non-compliance to minimum standards relating to safety, wages and human rights

Assessing effectiveness

We acknowledge we cannot improve our response to modern slavery if we do not review the steps we are taking in this area over time. Woollam will continue to engage and consult both internally and externally regarding our approach in order to support our ongoing continuous improvement approach to reach our strategic intent to eradicate modern slavery.

This will be achieved as outlined in our mitigation strategy outlined above (*What Woollam is planning*). In particular the review of our supplier surveys will provide insight and opportunities for us to adapt our approach. ⁽⁸⁾ Senior management and the Board will regularly review and monitor our plan progress.

We will continue to engage and work to eradicate modern slavery risk and encourage our suppliers to report areas of concern.



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WA BUILDING REGISTRATION No. 14180

ACN 009 676 064
ABN 94 009 676 064

A 'TF Woollam & Son Pty Ltd' Company