

## Modern Slavery Statement

### Infinity Constructions Group Pty Ltd Modern Slavery Statement

The purpose of this statement is to set out the steps taken by Infinity Constructions Group Pty Ltd (ICG) to prevent modern slavery within our operations and supply chains.

#### Who are we?

ICG is an Australian Construction Company with offices in Sydney and Melbourne. We undertake educational, commercial, hospitality, industrial, community, aged care, accommodation, tourism and government projects. We also undertake luxury residential and high rise residential based on market circumstances and the needs of our existing Clients.

ICG was established in 1992 and has developed a reputation for undertaking difficult construction projects with an emphasis on safety, environmental management, quality, timely completion and value engineering. We are the contractor of choice for a number of leading architects, developers and clients.

#### Code of Conduct

At ICG we promote freedom of expression and open communication, however all employees, and our subcontractors, are expected to follow our Code of Conduct.

Our Code of Conduct contains the details on the standard of ethics, conduct and behaviour that we are expected to operate under including the observation of basic human rights and the applicable labour laws.

A mandatory online Code of Conduct training module, through our Human Resources Information System, is undertaken by all our employees within the first week of employment.

Our Intranet portal contains a copy of the Modern Slavery Act 2018 for all employees to refer to.

In addition, we encourage all of employees to raise any breaches of the Code of Conduct via our Whistleblower policy.

#### Whistleblower Policy

ICG recognises the value in developing and fostering a culture of corporate compliance, ethical decision making and protecting eligible whistleblowers to make protected disclosures without suffering detriment.

The purpose of our Whistleblower policy is to prevent and protect disclosable matters, outline the process by which a protected disclosure may occur, including how and to whom a protected disclosure should be made, outline the process by which ICG will investigate protected disclosures, inform eligible whistleblowers who make protected disclosures about the protections from detriment, and outline the process for fair treatment of persons to whom a protected disclosure relates or mentions.

## Suppliers and Subcontractors

The majority of the works that we undertake are reliant on a strong supplier and subcontractor base (Suppliers). Many of our Suppliers have worked with us for many years and some dating back almost 3 decades. Our excellent reputation and the continuance of that reputation is very much reliant on them. We work with them in a cooperative and collaborative style relationship.

It is therefore imperative that all of our subcontractors are assessed for their “like mindedness” with our stated behavioral values. Our stated behavioral values include anti-discrimination, equal rights and employee empowerment.

## Procurement Processes

In order for a Supplier to be engaged on one of our projects they must submit a completed “Subcontractor/Supplier Questionnaire”. This questionnaire is assessed and vetted by our procurement teams to ensure that the Supplier has the relevant processes in place to ensure that they are able to comply with our processes. As part of this assessment and vetting process our Suppliers are required to set out their policies and approach to managing modern slavery.

Our Suppliers are expected to have their own Code of Conduct in line with ICG’s Code of Conduct.

In addition, all prospective Suppliers must attend a “Tender Interview Questionnaire” meeting where they are asked to confirm their commitment to their modern slavery policy.

For those Suppliers who engage sub-suppliers, including those that are based internationally, we request compliance statements with the Modern Slavery Act.

As a minimum they must confirm strict compliance with all local and national employment laws and regulations including the payment of the minimum wage and comply with all relevant bribery, corruption and secret commissions laws.

In addition, they must confirm strict compliance with occupational health and safety and Environmental laws.

As a senior management check prior to a contract being let, our Authority to Let a Contract form has a prompt to ensure that a Supplier’s Modern Slavery procedures have been adequately considered.

The performance of our Suppliers is assessed at the completion of their works and entered into a data base for subsequent procurement teams to review.

We are committed to the highest ethical behaviour attainable and will continue to train and communicate with our employee, suppliers and the greater supply chain to reduce wherever possible any incident of modern slavery.



**Tom Silk**  
**General Manager**