



Modern Slavery Statement 2024



This report marks our second Modern Slavery Statement, wherein we detail our commitments and strides in mitigating modern slavery risks across our supply chain and services



Acknowledgement of Country

We acknowledge the Traditional Custodians of this land, and recognise their continuing connection to land, water and community. We pay our respects to Aboriginal and Torres Strait Islander cultures, and to Elders past, present and emerging.

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Brad Berryman
CEO, Co-Founder

Letter from CEO

At Modus Projects, we adhere strictly to the highest standards of integrity and accountability. We firmly believe that any form of human rights violation contradicts the fundamental values we hold dear as a company. Consequently, we maintain a zero-tolerance policy towards such practices and are fully committed to ensuring they have no place whatsoever within our operations or supply chain.

Recognising the construction industry as one of the most susceptible sectors to modern slavery, we are acutely aware of the significant responsibility we carry as key stakeholders. With people being the cornerstone of our business, we are resolutely committed to utilising all available means to safeguard and uphold their rights.

Our dedication to ethical business conduct extends comprehensively to how we interact with individuals within our organisation and throughout our supply chain. We expect our suppliers to mirror our commitment to respect and adherence to ethical standards, and we actively collaborate with them to ensure that human rights are maintained at every stage of our operations.

This marks our second Modern Slavery Statement, and I am pleased to highlight the progress we have achieved since our last report. We have implemented robust policies and procedures aimed at preventing and addressing modern slavery within our operations. Moreover, we continuously invest in training and awareness programs to empower all our employees with the ability to identify and report any potential instances of modern slavery.

Furthermore, we are unwavering in our commitment to leverage our platform and influence to advocate for the eradication of modern slavery, not just within our industry but on a broader scale. We firmly believe that through collaborative efforts with our stakeholders, we can drive positive change and contribute to a future where modern slavery becomes a thing of the past.

Sincerely,

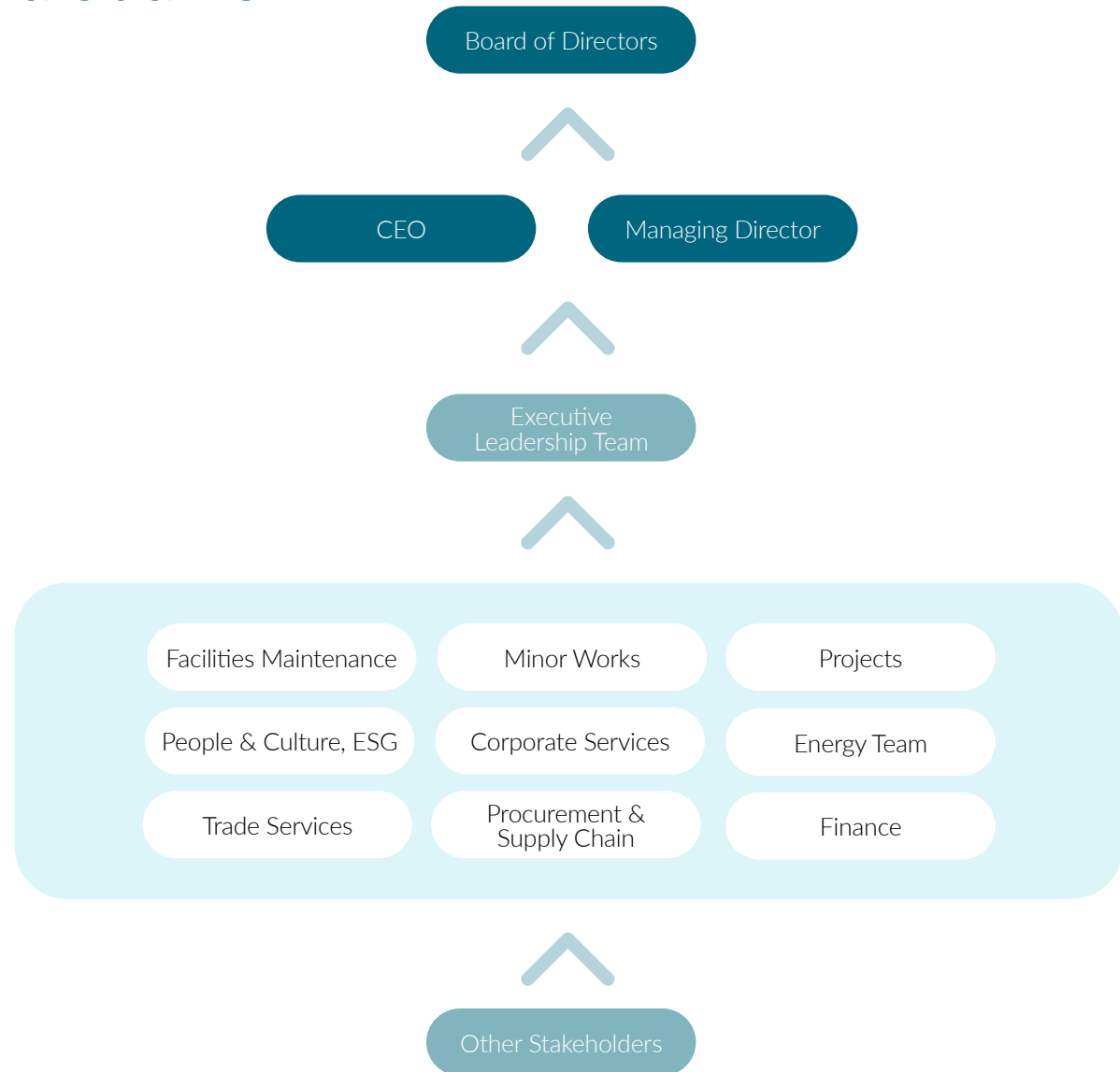


Our Identity

ABOUT THIS STATEMENT

At Modus Projects Pty Ltd, established 16th April 2010 ACN: 143 167 159 ABN:63 143 167 159, we are committed to acting ethically and responsibly in all aspects of the business. This includes actively addressing and preventing modern slavery. The following statement outlines our commitment to combating modern slavery and sets out the steps we have taken to ensure compliance with the reporting entity for purposes of section 13 of the Modern Slavery Act 2018 (Cth).

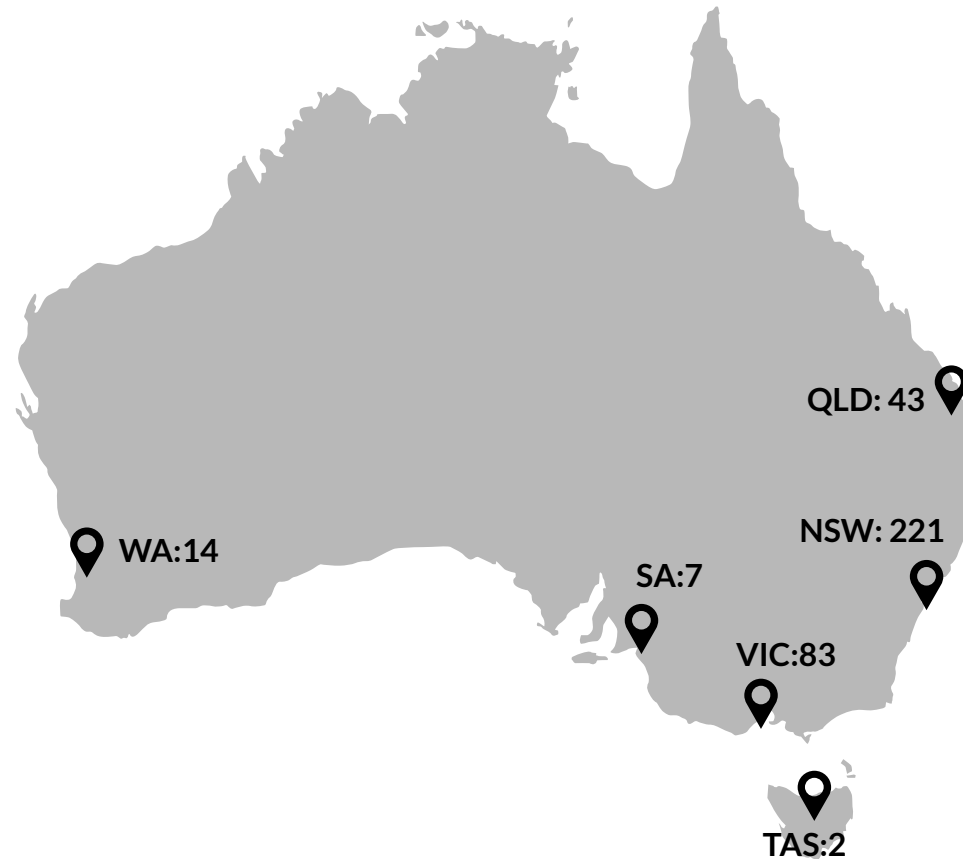
Governance Structure



Modus Projects is a privately owned Australian company. We specialise in providing high-quality facilities maintenance, building, project management and fit-outs, delivered by our skilled workforce and trusted network of suppliers throughout Australia.

Our Structure

We currently have over 370 employees, 3000 contractors and suppliers, and over 200 clients. Our 11 branches are located across the Eastern seaboard and Western Australia, and we manage approximately 9000 sites throughout Australia. We have long-standing relationships with multiple ASX100 organisations in numerous sectors across banking, retail, fuels, and convenience, as well as local, state and federal government accounts where barriers to entry are high. We strive to maintain the highest standards of integrity, fairness, and respect in all our business practices.



Modus Projects has zero tolerance for all forms of modern slavery such as human trafficking, slavery, forced labour, servitude, debt bondage, deceptive recruiting for labour or services and child labour within our supply chain.

Our Policies

Our policies are the first step in our approach to addressing modern slavery. We have established a comprehensive suite of policies for internal and external use.

The content written in our policies will continue to be updated to reflect relevant circumstances and any changes in the climate in which we operate. All policies are easily accessible to our employees, and they are encouraged to speak up and ask any questions or concerns related to Modus' policies and procedures. To ensure compliance with the Modern Slavery Act 2018, we have implemented the following policies and procedures (See Table 1).

TABLE 1. Our policies related to Modern Slavery

Policy	Purpose
Code of Conduct	We maintain a comprehensive Code of Conduct that serves as a guiding framework for ethical conduct Code of within our organisation. We hold all employees accountable for adhering to this Code of Conduct, recognising that it is a shared responsibility to ensure a workplace that is free from any form of exploitation or human rights violations. To facilitate understanding and compliance, we provide regular training and awareness programs.
Psychosocial hazards & positive duty policy	Modus prioritises team well-being through comprehensive measures, including thorough induction and compliance training, regular communication channels, staff engagement surveys, and site safety protocols. A dedicated People and Culture team offers support, while audits and grievance procedures ensure ongoing safety. Rostering schedules are reviewed to prioritize team members' safety on sites, with strict site entry conditions enforced and necessary site inductions provided.
Whistleblower Policy	We established a robust reporting mechanism that allows employees, suppliers, and stakeholders to report any concerns or suspicions regarding modern slavery. We treat all reports seriously and undertake prompt investigations, taking appropriate action if any wrongdoing is identified. Our policy guarantees the protection of whistleblowers and ensures their anonymity, promoting a safe environment for reporting.
Diversity and Inclusion policy	At Modus, we value the unique contributions of each individual, recognising that diversity is integral to our success. We have fostered an inclusive corporate culture, actively promoting equal opportunities for employees of all backgrounds to thrive and belong. We oppose any discrimination based on any characteristic protected by law. Through proactive diversity outreach and merit-driven selection processes, we ensure a broad representation of perspectives and experiences exist within our workforce.
Human Rights and Modern Slavery Policy	The policy integrates human rights principles into policies, practices, and decision-making processes, complying with international and national standards. Key principles include zero tolerance for human rights violations, equitable remuneration, safe working conditions, and prohibiting forced labour. Steps are taken to mitigate modern slavery risks in the supply chain, and effective grievance mechanisms are maintained. Regular monitoring and reporting ensure compliance and continuous improvement.
Work Health & Safety policy	The policy outlines various procedural adaptations aimed at reducing workplace incidents and fostering a safe working environment. These include monthly trade management meetings, collaboration with return-to-work coordinators and insurers, monthly national audits, establishment of measurable objectives and targets for continuous improvement, and rotation of repetitive tasks among employees to minimise fatigue and injury risks.

Internal audits are conducted regularly by our People and Culture and Finance team, to ensure ongoing legislation compliance pertaining to salary, hours worked, and safety.

Managing our Modern Slavery Risks

Recruitment and Fair Wages

Modus Projects prides itself on employing and retaining fit-for-purpose and highly skilled employees and hiring of their own free will. At Modus Projects we believe in fair working conditions and embrace a respectful work environment. All Modus staff are employed abiding by Australian Workplace legislation (Fair Work Act 2009). All office-based and project-based employees are paid substantially above relevant awards. Hours worked are within legislative requirements. Trade-based employees who would be covered by awards such as Building and Construction and Plumbers Sprinklers Award are also paid above base rates.

As part of our commitment Modus continues to engage a top-tier professional services firm to complete internal and external audits relating to our payroll and contingent workforce practices to understand any potential risks and further mitigate any current/future threats to the business. Modus deems its operations as having low to zero risk of exposure to Modern Slavery through recruitment processes including police checks, reference checks, validation of visas and working rights. Any team members employed under 18 years of age are not required to work more than the award requirements and are paid above award rates.



We recognise that modern slavery is a global issue and understand the importance of taking proactive steps to address it. Our commitment extends to respecting human rights and promoting ethical conduct throughout our organisation. We expect our service providers, suppliers, and contractors to share our commitment to act lawfully and ethically and to work to ensure that modern slavery is not taking place within its organisation or its supply chain.

Operations and Supply Chain

We have mapped our supply chain to identify the various tiers and entities involved and screen procedures to evaluate contractors and suppliers to assist in the identification of key risks. Each subcontractor must complete a series of compliance checks such as our modern risk questionnaire, to understand the supplier's approach towards modern slavery exposure, issues, and their procedure to manage and eradicate any potential risks within their business and supply chains before being approved onto our database. Post the induction stage, Modus completes regular ad hoc and scheduled audits to ensure the integrity of this data is correct and the conditions are maintained. Upon this probity, insurance, and credit checks being completed, a service level agreement is issued, and the terms agreed upon by the subcontractor must be signed off before the commencement of working with Modus.

As an organisation, we source our materials from recognised and large suppliers in Australia. These suppliers must have considered their suppliers and conducted due diligence processes regards to the Act. During this reporting period, we have been focused on analysing our modern slavery risks across the full extent of our supply chains as outlined in Table 2.

TABLE 2. Top spend suppliers 2024

Supplier Sector	Description	Risk Rating
Raw Materials	This sector involves the sourcing and supply of raw materials used in construction, maintenance, and fit-out projects, such as timber, metals, plastics, and chemicals.	Medium
Contract Labour	Contract labour refers to the hiring of temporary or project based workers for specific tasks, such as construction labourers, electricians, plumbers, or painters.	Low
Vehicles	The transport sector involves the movement of goods, equipment, and workers to and from project sites.	Low
IT and telecommunication services	Encompass the provision of technology infrastructure, software, communication networks, and support systems.	Medium
Office equipment	Office equipment includes furniture, computers, printers, and other supplies necessary for administrative tasks.	Medium
Marketing services	Marketing services involve activities such as advertising, branding, design, and promotional campaigns.	Low
Freight and logistics	Freight and logistics include the transportation, warehousing, and distribution of goods and supplies.	Low
Catering services	Involve providing meals and food services.	Low

Operations and Supply Chain

Our indirect supply chain involves utilising labour in manufacturing materials acquired by Modus, which are then installed at client sites. It is crucial to clarify that Modus doesn't directly import from overseas. The construction industry's supply chain, particularly concerning raw materials, is complex, multi-layered, and often lacks transparency. This complexity makes it challenging to monitor overseas factories and their labor conditions, thus posing significant hurdles in tracing material sources. As a result, our raw material's risk rating is considered medium.

Despite these challenges, Modus conducts thorough assessments of manufacturers supplying wholesalers. We evaluate their commitment to combating modern slavery and assess their procedures for mitigating its adverse effects. This evaluation helps us gauge our exposure to modern slavery and the effectiveness of our suppliers' measures in addressing this issue. To bolster our evaluations, we refer to external sources such as the Walk Free Global Slavery Index and the Responsible Sourcing Tool. Additionally, we adhere to standards outlined in the United Nations Guiding Principles on Business and Human Rights and the National Action Plan to Combat Modern Slavery 2020-25.



Consistent consultation, collaboration, and communication are integral to our approach. We actively engage with relevant stakeholders to review and determine the level of risk and to foster a shared responsibility in combating modern slavery. Moreover, we engage independent auditing services provided by professional firms to ensure compliance and minimise modern slavery risks to our business.

Due Diligence To Address Modern Slavery Risks

Recognising the vulnerabilities inherent in the construction business, it is imperative to identify pertinent issues and develop effective prevention strategies. We continuously monitor and review our policies, procedures and supply chains to ensure their effectiveness in eradicating modern slavery following our risk management framework which we adopted from the [Modern Slavery Response and Remedy Framework developed by Minderoo Foundation Walk Free:](#)

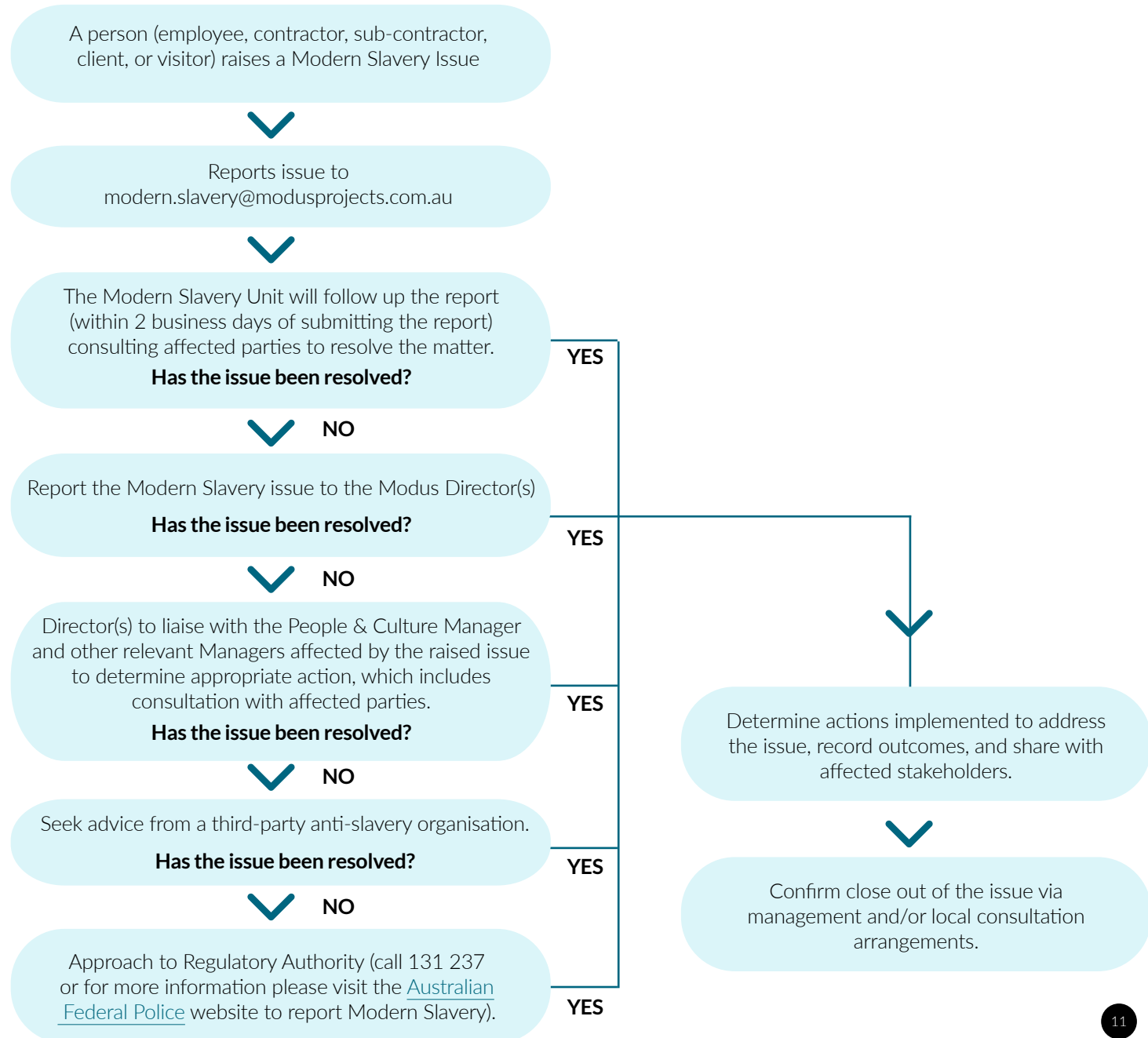
Figure 1. Modern Slavery Response and Remedy Framework



To ensure the effective handling of any potential Modern Slavery issue, we have implemented a resolution flowchart that provides clear guidance for identifying and determining the appropriate course of action.

If there is any instance of Modern Slavery associated with any aspect of Modus Projects' activities, we encourage individuals to use our Modern Slavery email address, where anyone can conveniently report such incidents.

FIGURE 2. Modern Slavery Issue Resolution flowchart



We understand the importance of transparency in our efforts to combat modern slavery. As such, we proudly publish our Modern Slavery statement and policy on our website, making them readily accessible to all stakeholders. This ensures that our commitment to eradicating modern slavery is not only demonstrated through actions but also communicated openly to the public.

Training

We acknowledge that everyone plays a key role in preventing modern slavery. Modus Projects raise awareness and promotes a better understanding of the circumstances in which modern slavery may occur within our industry. We provide training and capacity-building initiatives for our employees, suppliers, and stakeholders. This includes workshops and educational resources to raise awareness, improve understanding, and empower individuals to identify and respond to modern slavery risks. All employees are required to complete training annually on Modern Slavery. We foster a culture of reporting and vigilance among our employees, encouraging them to report any suspicions or concerns related to modern slavery. We provide channels for confidential reporting and ensure that all reports are promptly investigated, and appropriate actions are taken.

We measure the effectiveness of our training programs by incorporating feedback after every session to encourage our employees to be involved. Implement necessary changes and learn from past experiences to continuously enhance our approach to combating modern slavery.

Following our initial report, we swiftly enacted a comprehensive Modern Slavery Training Program designed to educate our entire workforce. This initiative encompasses a diverse array of resources, such as interactive videos and engaging learning activities, aimed at fostering a deep understanding of Modern Slavery among our staff. We are pleased to report a significant uptake in participation, with over 90% of our workforce actively engaging in the program.



At Modus, we are dedicated to continually refining our strategies to identify, assess, and combat modern slavery risks. Following, is a summary of the progress we have made on our commitments so far in a professional manner.

Our Progress and Commitments

Table 3. Progress and Commitments up to date

Commitment	Description	Progress
Formal Grievance Mechanism	Ensure all reports are promptly investigated and appropriate actions are taken.	Achieved
Modern Slavery Training	Training remains a fundamental aspect in our efforts to raise awareness and educate all employees throughout our organisation. We strongly encourage team members to report any incidents they may encounter.	Ongoing
Collaborate with industry	We continue to collaborate closely with industry peers, working together to strengthen our collective efforts in eradicating modern slavery risks.	Ongoing
Supplier Engagement	We have developed and endorsed our Supplier Code of Conduct, ensuring that all new suppliers must complete the supplier questionnaire before onboarding.	Ongoing
Update and enhance policies	We consistently update our policies to articulate our unwavering commitment to human rights.	Ongoing
Establish framework to review effectiveness of actions to eradicate modern slavery	We consistently update our policies to articulate our unwavering commitment to human rights.	Achieved

Modus is committed to maintaining a proactive and comprehensive approach to combating modern slavery through ongoing education, engagement, and communication with all stakeholders. We remain dedicated to continuously enhancing our practices, staying informed of emerging trends, and adapting our approach to ensure the highest level of effectiveness in our efforts.

Further Steps

We are committed to achieving ethical standards and acting with integrity in all business dealings and relationships, and where possible, to ensure modern slavery is not taking place in our own business or supply chain. We will continue to monitor and review our risk processes and effectiveness through improvements in results, low-risk levels, and non-compliances.

At Modus we continually challenge ourselves to improve our efforts to mitigate the risks of modern slavery by implementing:

Risk Assessment	We continue to conduct a comprehensive risk assessment across our operations and supply chains to identify potential areas of modern slavery risk. This assessment will include factors such as geographic locations, high-risk industries, and vulnerable worker populations.
Supplier Engagement	We continue to strengthen our engagement with suppliers to ensure their understanding and commitment to eradicating modern slavery. This includes incorporating modern slavery clauses in supplier contracts, supplier code of conduct, questionnaires, conducting supplier audits, and review sustainable and responsible resourcing methods.
Collaboration & Partnerships	We commit to actively collaborating with industry peers, trade associations, NGOs, and government bodies to share best practices, initiatives, and resources in the fight against modern slavery.
Reporting & Communication	We have developed a clear and transparent reporting mechanism to highlight modern slavery risks observed by our employees or suppliers. As well track progress, measure impact, and communicate these efforts to stakeholders as required. This includes regular reporting on key performance indicators, as well as the publication of an annual modern slavery statement.
Stakeholder Engagement	We will continue to engage with external stakeholders, including customers, investors, and civil society organisations, to understand their expectations, gather feedback, and collaborate on initiatives to combat modern slavery.

We recognise that eradicating modern slavery is a complex challenge that requires collaboration and ongoing effort from all stakeholders. Through our policies, procedures, and responsible business practices, we aim to contribute to a world where every individual is treated with dignity, respect, and fairness. Our modern slavery statement will be reviewed annually and published on our website to demonstrate our transparency and commitment to combating modern slavery.

This statement was approved by the CEO and the Managing Director of Modus Projects Pty Ltd on 31/03/2024



Brad Berryman
CEO



Troy Mayne
Managing Director



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