

Modern Slavery Statement 2023

July 2022 – June 2023

Built

THE NEW WAY
FORWARD

Built Modern Slavery Statement FY 2023

Built is a national diversified general contractor operating across Australia, with two overseas satellite offices in New Zealand and the United Kingdom. Built works across all major property sectors including commercial office, retail, residential, hotels and hospitality to health and aged care, education, government, and transport. Built’s core area of operation is building construction, including fitout and refurbishment.

This Modern Slavery Statement (MSS) is prepared pursuant to the Modern Slavery Act 2018 (“Act”) and sets out the actions taken to assess and address modern slavery and human trafficking risks in our business and supply chain for the financial year ending 30 June 2023.

Summary of Approach and Progress to Date

This is Built’s fourth MSS and summarises actions taken to improve its response across its operations to the requirements set out in the Act. Built established Modern Slavery and Social Procurement Working Groups to identify both risk and opportunity within its supply chain to drive positive procurement outcomes. Guided by its Built Worthy corporate values, Built developed a number of policies, processes and changes to procurement methodologies to identify and address modern slavery risks associated with labour on construction sites and construction materials.

Built’s vision is that the collective actions taken as outlined in this MSS will drive the progressive reduction of modern slavery risk within its supply chain.

Built has been working throughout FY2023 to embed these practices throughout its operation and supply chain. Built has given its project teams, guided by the Sustainability and Social Impact department, a mandate to identify and address instances of modern slavery and modern slavery risk, supported by industry best practice guidance and methodologies.

Built’s vision is that the collective and cumulative actions taken in previous years, and as outlined in this MSS, will drive the progressive reduction of modern slavery risk within its supply chain.

Australian and UK Reporting Criteria

The following sections set out Built’s response to each of the mandatory criteria listed in section 16(1) of the Australian Modern Slavery Act 2018 and the recommended criteria listed in Section 54(5) of the UK Modern Slavery Act 2015.

UK Act: Section 54(5)	Australian Act: Section 16(1)
Structure and supply chains	Mandatory criteria (a) & (b): Structure, Operations & Supply Chain
Risk assessment and management	Mandatory criteria (c): The Risks of Modern Slavery
Policies in relation to slavery and human trafficking	Mandatory criteria (d): Actions Taken for Assessment of and Addressing Risks, Due Diligence and Remediation
Due diligence processes in relation to slavery and human trafficking	
Training on modern slavery and trafficking	
Effective action taken to address modern slavery	Mandatory criteria (e): Measuring Effectiveness

Mandatory Criteria (a) & (b): Structure, Operations & Supply Chain

This MSS relates to proprietary limited construction and development businesses that trade predominantly under the Built trading name, which are ultimately controlled by a privately owned entity Built Group Holdings Pty Ltd (ACN 163 462 637).

Built’s operations are mainly Australia-based in the states of NSW, ACT, Vic, Qld, SA, and WA. Built also has international offices in New Zealand and the UK, operating fitout and refurbishment businesses. In NSW, Built is delivering some major projects in a joint venture with Obayashi Corporation.

Built also operates a small property development arm that has to date exclusively procured its construction undertakings, in NSW and Vic, via the Built construction businesses referenced above. In addition, Built operates a joinery manufacturing business located in Qld through Mayneline Joinery Pty Ltd.

Built's operations directly employ approximately 1200 staff in corporate, project delivery, and manufacturing (Mayneline) roles. Whilst Built's supply chain includes the procurement of typical goods and services required to operate and administer a business, Built's supply chain spend is dominated by the contracted supply and installation of construction related materials, plant and equipment, and services procured via its main Australia-based contracting entities Built Pty Ltd, Built Qld Pty Ltd, and Mayneline Joinery Pty Ltd. The consolidated revenue for these three entities was circa \$2.4bn for the FY23 reporting period, representing some 95% of the overall controlling entity revenue.

The aforementioned materials, plant, equipment and services originate from both Australia and overseas. Built's supply chain is made up of over 5,200 suppliers and contractors who are directly engaged by Built on a project-by-project basis, with a spend of \$10k or more with over 3,300 of those suppliers and contractors

Mandatory Criteria (c): The Risks of Modern Slavery

The Risk of Directly Causing Modern Slavery

Built's operations where labour is directly engaged are limited to its Australian, New Zealand and UK businesses. As Built's labour engagement and management policies and practices are structured strictly in accordance with the relevant laws, the risk of Built directly causing modern slavery is considered low.

The Risk of Contributing to Modern Slavery

Built continues to acknowledge that its businesses are at risk of contributing to modern slavery through its operations and/or actions in its supply chains. This includes acts or omissions that may facilitate or incentivise modern slavery through commercial pressures. Such risks may continue to materialise and evolve because modern slavery is a growing global problem with local impact and a human cost, exacerbated by economic pressures and the Covid-19 pandemic. This poses risks to Built in terms of the potential to unknowingly and unintentionally contribute to modern slavery conditions through material sourcing or use of labour in the supply chain. However, as Built's procurement practices are governed by a multi-layered approval process, this risk is considered an unlikely occurrence.

Direct Link to Modern Slavery

Built continues to acknowledge that it is at risk of being connected to modern slavery through the

activities of other entities that Built has business relationships with, namely suppliers and contractors. Further, supply chain partners of direct suppliers and contractors also present risk. Given the diversity and depth of parts of Built's supply chain, it is links of this nature that are considered Built's most significant risk of exposure to modern slavery.

In particular, the risks of modern slavery are most likely to arise from:

1. Materials sourced from overseas regions at risk of modern slavery; and
2. Local trades where unskilled or semi-skilled labour is sourced.

Mandatory Criteria (d): Actions Taken for Assessment of and Addressing Risks. Due Diligence and Remediation.

The actions taken by Built to assess and address the risks of modern slavery in FY2023 were a continuation of the approach and actions taken in FY2022, which laid the foundations for an existing program of works and system of monitoring that continue to reinforce due diligence and remediation measures. Building on the policies and mechanisms that were introduced 12 months prior, the following summarises key updates to the existing mechanisms that remain integrated into Built's operating framework, and integral to the success of modern slavery risk management, while disclosing any noteworthy new actions taken:

- Supplier Code of Conduct
- Sustainable Procurement Policy
- Whistleblower Policy
- Modern Slavery Hot Spot Analysis
- Engaging with Suppliers and through Built's Project Delivery Framework
- Migrating to Property Industry Platform for Modern Slavery
- Training Modules

A summary of each of the above is provided below.

Supplier Code of Conduct

The Supplier Code of Conduct remains in place as a key policy instrument that sets Built's minimum expectations and non-negotiable requirements of all participants in its supply chains in relation to:

- human rights and labour practices;
- environmental management;
- professional conduct;

- governance; and
- community engagement.

The Supplier Code of Conduct is publicly available and shared with all suppliers at the onboarding stage and is included in contractor engagement contracts.

Sustainable Procurement Policy

The Sustainable Procurement Policy is a key instrument in which Built can engage its suppliers through a considered approach to procurement. By publishing the Sustainable Procurement Policy, Built affirms its commitment to sustainable procurement and outlines its business and human rights expectations for its multitiered supply chain.

Built recognises that as a major company in the construction industry, it can play a pivotal role in encouraging sustainable environmental and social procurement practices within its supply chains as well as working with suppliers and subcontractors to address its obligations under the Modern Slavery Act.

Built has a strong commitment to sustainability and social procurement practices across its operations and projects. The Sustainable Procurement Policy outlines Built’s public commitment and expectations of employees, subcontractors and suppliers in three key areas including environmental sustainability, social procurement and modern slavery.

Whistleblower Policy

The Whistleblower Policy sets out Built’s commitment to the reporting and investigation of misconduct or improper states of affairs or circumstances such as those not aligned with Built’s Supplier Code of Conduct and Sustainable Procurement Policy. The policy, which complies with the requirements of the Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 provides employees, supply chain participants, and clients the opportunity to report suspected instances of modern slavery anonymously and with appropriate protections.

There were no reported instances in FY2023 of misconduct pertaining to modern slavery via the multiple reporting avenues afforded under Built’s Whistleblower Policy.

Modern Slavery Hot Spot Analysis

Built previously completed an analysis of potential modern slavery ‘hot spots’, which involved both external experts and an internal consultation committee, including key members of the construction delivery team. Built then engaged an

independent specialist to update the Modern Slavery Hot Spot Risk Analysis to ensure Built is working with the latest information from global databases.

The Modern Slavery Hot Spot Risk Analysis is a key reference point for other actions and initiatives described in this Modern Slavery Statement and has subsequently been integrated into Built’s Sustainable Procurement Plan. This facilitates a risk assessment based on the scope of each project, while identifying high risk trades or materials based on known or emerging hot spots. By embedding the hot spot analysis in such a way, Built provides a pathway for project teams to follow when engaging trades and suppliers considered to be higher risk. In addition, Built continues to use the Equifax Ethical Supplier Screening platform to screen its top 200 suppliers by \$ value spend.

Engaging with our Suppliers and through our Project Delivery Framework

Built continued its engagement with its supply chain partners throughout FY2023 in order to identify modern slavery risks and take a collaborative approach with its suppliers in addressing risks and promoting continuous improvement.

Built directly engaged its top suppliers, prioritising efforts based on spend value, and requesting they complete detailed modern slavery assessment questionnaires for their Australian and offshore operations, suppliers and subcontractors as part of Built’s own due diligence process. Built further encouraged its suppliers to carry out due diligence audits of their own supply chains to verify upstream and downstream modern slavery risks are being mitigated.

The Built Modern Slavery Hot Spot Risk Analysis continues to be used within key project tenders (targeted projects with a value >\$25m) to evaluate trades at risk of modern slavery exposure. If specific risks are identified that are a consequence of client materials preferences, consideration is given to suggesting potential mitigation measures, including alternative selections within Built’s tender responses. Provided the opportunity, Built will discuss these issues with its clients to influence an outcome aligned with its commitment to reducing modern slavery.

Prior to engaging subcontractors and suppliers on key projects, project delivery teams continue to reference the bid phase risk assessment and Built Modern Slavery Hot Spot Risk Analysis to confirm the project specific modern slavery risks.

Identified high risk trades are issued a targeted

Supplier Survey for response and evaluation by Built prior to engagement. Where risks are identified as part of the evaluation, mitigation strategies are explored, including investigation of alternative materials or, if risk cannot be sufficiently mitigated through the trade contractor, alternative contractors.

Migrating to Property Industry Platform for Modern Slavery

As part of its efforts to continue to streamline modern slavery risk assessment, mitigation and reporting, Built conducted a review of available digital solutions that could provide an integrated, industry-specific solution to addressing the concerns of modern slavery in its construction supply chain while ensuring compliance with the Modern Slavery Act. Informed 365, an Australian based technology company specialising in sustainability outcomes including management of modern slavery risk, was deemed to be a fit-for-purpose application and the preferred platform for the Property Council of Australia, the peak body representing the domestic Australian property industry. By engaging with the same platform, Built will improve the consistency and quality of data collected, improve analysis and reporting functionality while further streamlining and simplifying the reporting process, and work proactively with clients and suppliers across the property and construction industry to mitigate risk.

The platform is expected to be live in early FY24. It is also expected that the platform will allow Built to reach a greater number of suppliers in its supply chain, starting with the top 500 suppliers by spend, further boosting its capabilities to identify and address instances of modern slavery in a more streamlined manner.

Training Modules

The online Modern Slavery Act training module, which was released in FY22 and made available to all Built direct employees, had a completion rate of 95.63% across the business. The training module is designed to give Built employees an overview of the Modern Slavery Act, explain how Built is responding under its reporting obligations, as well as outlining what is expected of each staff member. As Built further develops its capabilities to identify and mitigate risk, additional training modules may be developed in alignment with changes to process or procedure, aimed at increasing awareness on modern slavery and improving Built's ability to respond effectively.

Mandatory Criteria (e): Measuring Effectiveness

Built's response to modern slavery continues to be incorporated into its operating framework, facilitating the following ongoing opportunities to measure effectiveness:

- The entire framework is subject to a Continual Improvement program in which content owners continually assess effectiveness and implement improvements.
- Built's Internal Audit program measures compliance with our operating framework.
- The record keeping required by the framework will enable analysis of effectiveness year on year, including in instances where specific modern slavery risks are identified.
- Supplier Surveys from our supply chain partners are required to be updated biennially, enabling Built to track increased comprehensiveness of responses and improved engagement practices within supply chains.
- Awareness training includes mandatory assessment of attendee understanding of content.

Mandatory Criteria (f): Consultation with Entities

Consultation and collaboration with the various entities that are the subject of this MSS has been undertaken as follows:

- Content owners of each of the impacted disciplines in our operating framework have been actively involved in formulating Built's response to modern slavery. For example, the Commercial discipline which oversees all subcontracts and supply agreements in our contracting businesses assisted in the formulation of relevant aspects of the response in consultation with a group of commercial discipline managers across the various entities and business units.
- The response in relation to our manufacturing facility (Mayneline Joinery) was formulated in collaboration with the entity managers to ensure the particular risks associated with its supply chain were appropriately addressed.

Mandatory Criteria (g): Other Relevant Information

External Collaboration

During this reporting period, Westpac's Procurement Sustainability and Diversity team conducted a due diligence exercise examining Built's Environment, Social and Governance (ESG) policies, processes, and practices. The purpose of this review was to identify, prevent and mitigate modern slavery, alongside other ESG risks within Westpac's construction supply chain, and discover opportunities for supplier collaboration and uplift. The Westpac due diligence review focused on Built's modern slavery management, workplace practice and governance, and environmental sustainability practices and targets. Also included were two of Built's suppliers, with feedback provided directly to these suppliers. Overall, Westpac found the quality of Built's ESG policies, processes, and practices to be sound, with the majority meeting or exceeding expectations. Recommendations for improvement were provided and Built will continue to work through these recommendations in FY24.

Next Steps

Continued implementation of the actions outlined in this MSS and measuring the effectiveness of Built's actions has been and will continue to be Built's focus in the next reporting period (July 2023 – June 2024). Built will continue to engage its stakeholder groups to seek opportunities for improved awareness, due diligence, and cooperation amongst all parties. As Built migrates to the industry-wide platform, Informed 365, it expects to successfully reach a greater number of direct and indirect suppliers, although it's anticipated that supply chain risk may also increase over the same period due to global trends. Finally, Built will continue to prioritise and promote modern slavery training and awareness raising across business units and throughout its supply chain, which will form part of a wider plan to promote sustainability and social impact across the business.

Approval of this Modern Slavery Statement

This statement has the approval of the Statutory Board.



Brett Mason
CEO & Managing Director