

# Modern Slavery Statement

## FY 2023



Dangrove - Alexandria, NSW

Build. Above. Beyond.

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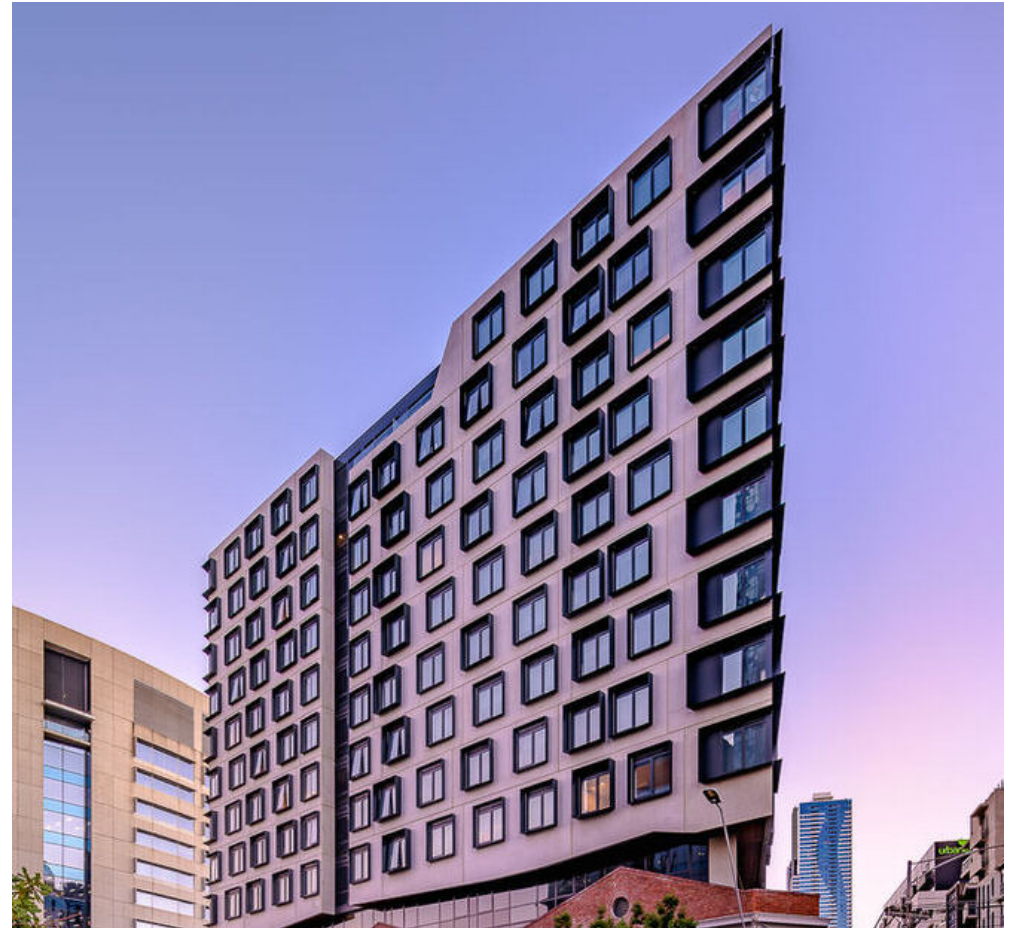
Dangrove - Alexandria, NSW

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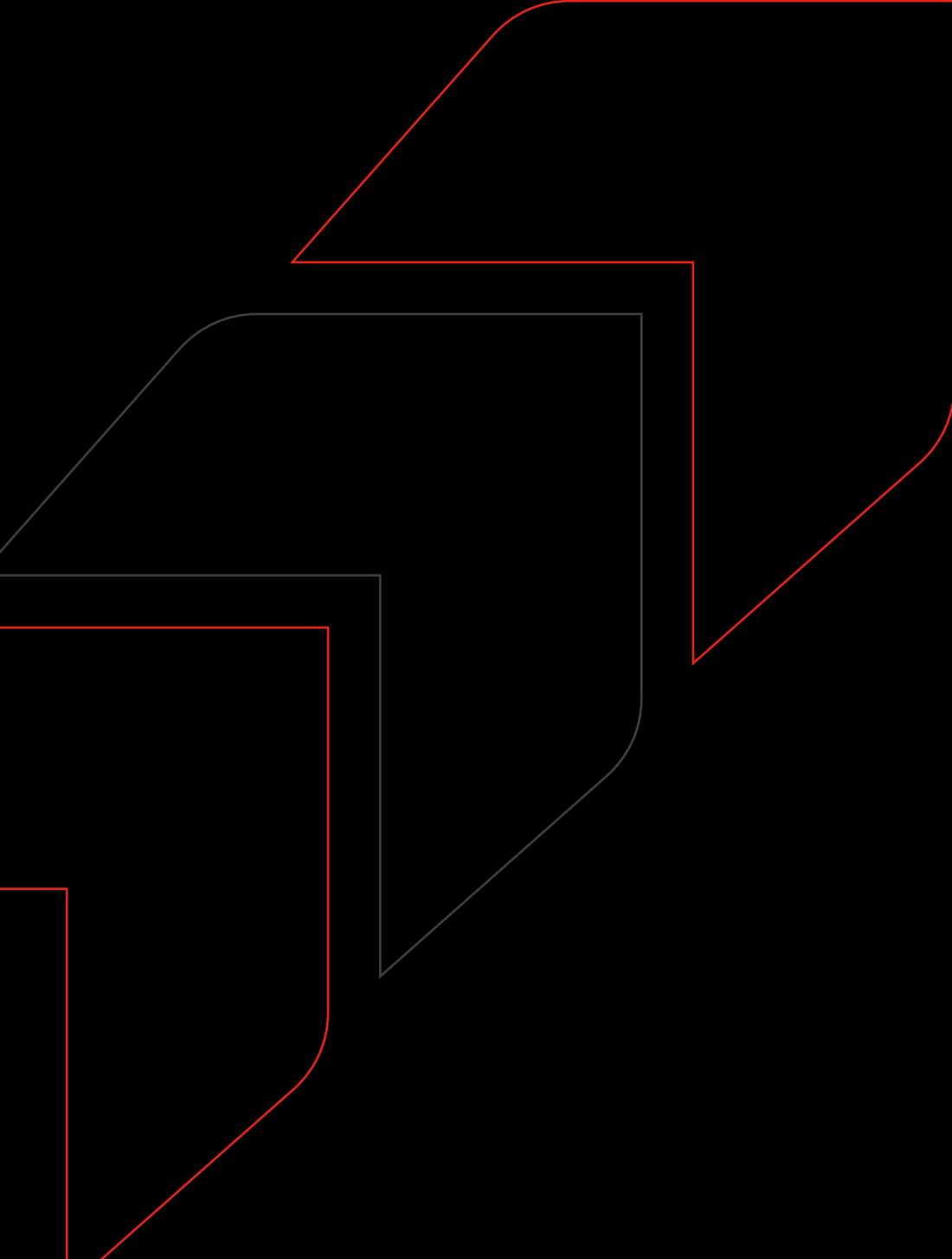


University Square - Carlton, VIC

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# INTRODUCTION



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# RESPECTING HUMAN RIGHTS

It is estimated that 40.3 million people around the world and at least 15,000 people in Australia live in slavery like conditions.

Respecting human rights is not only a moral imperative but also a fundamental responsibility for any organization, including a construction company like ours. As the Managing Director of Infinity I firmly believe that upholding human rights should be at the core of our operations.

Firstly, we are dedicated to ensuring the safety and well-being of all our employees and stakeholders. This begins with providing a safe working environment that complies with all relevant health and safety regulations. We understand that our workers are our most valuable assets, and their rights to fair wages, reasonable working hours, and a discrimination-free workplace are non-negotiable.

Secondly, we actively engage with the communities in which we operate. Construction projects can have a significant impact on local communities, and we are committed to respecting their rights to clean healthy living environment. We prioritize open and transparent communication with local residents to address their concerns and mitigate any negative effects our projects may have.

Thirdly, we recognize the importance of a diverse and inclusive workforce. Our company strives to provide equal opportunities for all, regardless of gender, race, religion, or other characteristics.

We actively promote diversity and inclusion in our hiring practices and ensure that all employees are treated with respect and dignity.

Fourthly, we are committed to ethical sourcing and procurement practices. We ensure that our supply chain partners adhere to the same human rights standards that we hold ourselves to. This includes monitoring for any potential violations related to child labor, forced labor, or other unethical practices in our supply chain.

Lastly, we believe in accountability and transparency. We maintain an open line of communication with our employees, stakeholders, and the public, ensuring that any concerns related to human rights are addressed promptly and effectively. We regularly assess our performance and seek feedback to continually improve our policies and practices via workshops, tool box sessions and training sessions.

By adhering to these principles and integrating them into our daily operations, we can contribute to a more just and equitable society while maintaining our commitment to excellence in the construction industry.



**Alan Yazbek**  
**Managing Director of Infinity Constructions**  
**Group Pty Ltd.**  
**21 November 2023**





Dangrove - Alexandria, NSW



Our Team

## OUR STORY

Infinity Constructions is an Australian Construction Company with offices in Sydney and Melbourne. We operate in 2 main sectors:

- Commercial
- Industrial

Specifically, in construction of offices, hotels and hospitality, health and aged care, industrial warehouses, student accommodation, build-to-rent and community and luxury bespoke projects.

Infinity Constructions 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 smart engineering.

We are the contractor of choice for a number of leading architects, developers and clients. This Statement is made by Infinity Constructions Group Pty Ltd (ABN 95 111 941 792) for the year ended 30 June 2022 pursuant to the Modern Slavery Act 2018. (Cth)(Modern Slavery Act).

Infinity Constructions Group Pty Ltd is a privately held company committed to driving positive change in the Australian Construction Industry (predominately in NSW).

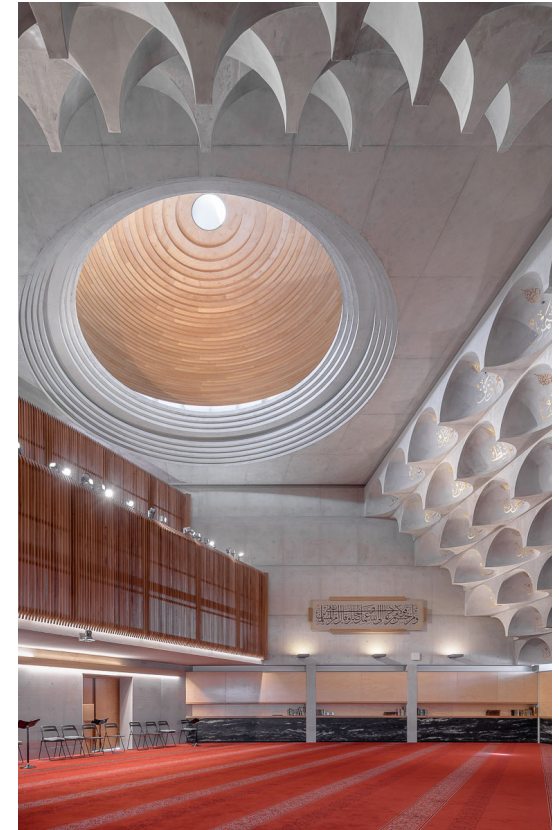
This statement sets out what Infinity Constructions Group Pty Ltd has done in the Financial year 2022/2023 to work towards ensuring that slavery and human trafficking is not taking place in any part of its business or supplychains.

# OUR MISSION

To maintain trustworthiness by working with all our stakeholders to deliver our projects with excellence, cooperation and collaboration, cost effectiveness, on time, with the desired quality and the highest level of workplace health and safety.



University Square - Carlton, VIC



Mosque - Punchbowl, NSW

# OUR VISION

To be recognised by our Clients, Consultants, Subcontractors, Suppliers, the Community and Employees as a Trustworthy Business Partner.

Build. Above. **Beyond.**

# OUR VALUES



Theo Orfanos Director, Alan Yazbek Managing Director - Infinity Constructions Group

Our core values are the building blocks to the success of Infinity Constructions, guiding our name to be synonymous with quality projects and construction. These values define Infinity and how we conduct our business. Since our inception, Infinity has earned its reputation in both the industry and wider community.



Judith Nielsen - Chippendale, NSW



## SAFETY

Safety is everyone’s responsibility and will always take priority over all other considerations. Safety is at the heart of everything that we do.



## SUSTAINABILITY

Our business must always remain sustainable. Sustainability is achieved when all our processes come together to deliver efficiency and value.



## ACCOUNTABILITY

We are accountable for the buildings we build, the way we operate and the outcome of our actions. Our buildings are there for the long-term and we respect our clients and those who occupy the buildings.



## TRUSTWORTHINESS

Trust in us and from us is the fundamental ethos of Infinity’s culture. In everything we do, we gain, maintain and foster trust. Trust comes from us delivering what we promised.

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# LOGISTICS



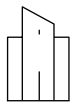
Infinity Constructions Staff

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Mosque - Punchbowl, NSW

## OUR OPERATIONS

**500+**

Projects Built

**2**

Office Locations (NSW &amp; VIC)

**110+**

Infinity Staff

**4-Star** Gold iCIRT Rating**2000+**

Australian Suppliers

**10+**

International Suppliers

# RISKS IN OUR OPERATIONS



The risk of modern slavery practices within our business are assessed on their potential cause, contribution or direct link to modern slavery through our operations and supply chains.

The risk of modern slavery in our operations was assessed overall as low to medium for the reasons set out below.

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# RISKS IN OUR OPERATIONS

IDENTIFIED HAZARDS OR ISSUES	RISK	RISK LEVEL
Casual or Contract workers engaged directly by Infinity	Infinity Construction's workforce is majority permanent, with <10% casual contractors.	Medium
Casual workers under the age of 18 years old.	Infinity Constructions has no casual employees under the age of 18 years old.	Low
Migrant Workers	Infinity Constructions has <1% employees on a temporary visa.	Low
Seasonal workforce fluctuation	Infinity Constructions operations are not seasonal, with consistent workforce turnover during the reporting period.	Low
External Auditing	Infinity Constructrion's audited to quality, environmental and safety management standards ISO9001, ISO14001 and AS45001 but is not currently audited by a third party for responsible sourcing. Also, accredited and annually audited by Office of Federal Safety Commissioner (OFSC).	Low
Sector Risk	Infinity Constructions operates in three high-risk sectors including: Construction, Recruitment and Cleaning services	High
Service engaged by Infinity	Infinity Constructions relies on services including recruitment, legal, cleaning services, construction suppliers and subcontractors (known as suppliers) , property maintenance waste disposal and equipment maintenance. Although, recruitment, construction and cleaning services are considered particularly high risk Infinity generally has long term relationships with small family businesses or recognised service providers with strong human rights.	Low-Medium
Staff	<p>Our executive leadership team meets regularly to discuss business risk, which ensures that they have visibility on all possible risks in our operations and the controls adopted to manage those risks</p> <p>We have strong human resources controls in place for on-boarding new employees, reviewing employees' wages and salary agreements, and verifying corresponding payments. These form part of our Integrated Management Systems that control the processes within our businesses.</p> <p>Our employee induction processes also ensure that new employees confirm they have read and understood our policies and minimum standards.</p> <p>Our employee on-boarding processes include working rights employment checks managed by our Human Resources group.</p> <p>Internal pay parity reviews are undertaken annually against industry benchmarks.</p> <p>Our staff are all located in Australia.</p>	Low



The Revy - Pyrmont, NSW

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## OUR SUPPLY CHAIN

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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 three 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.

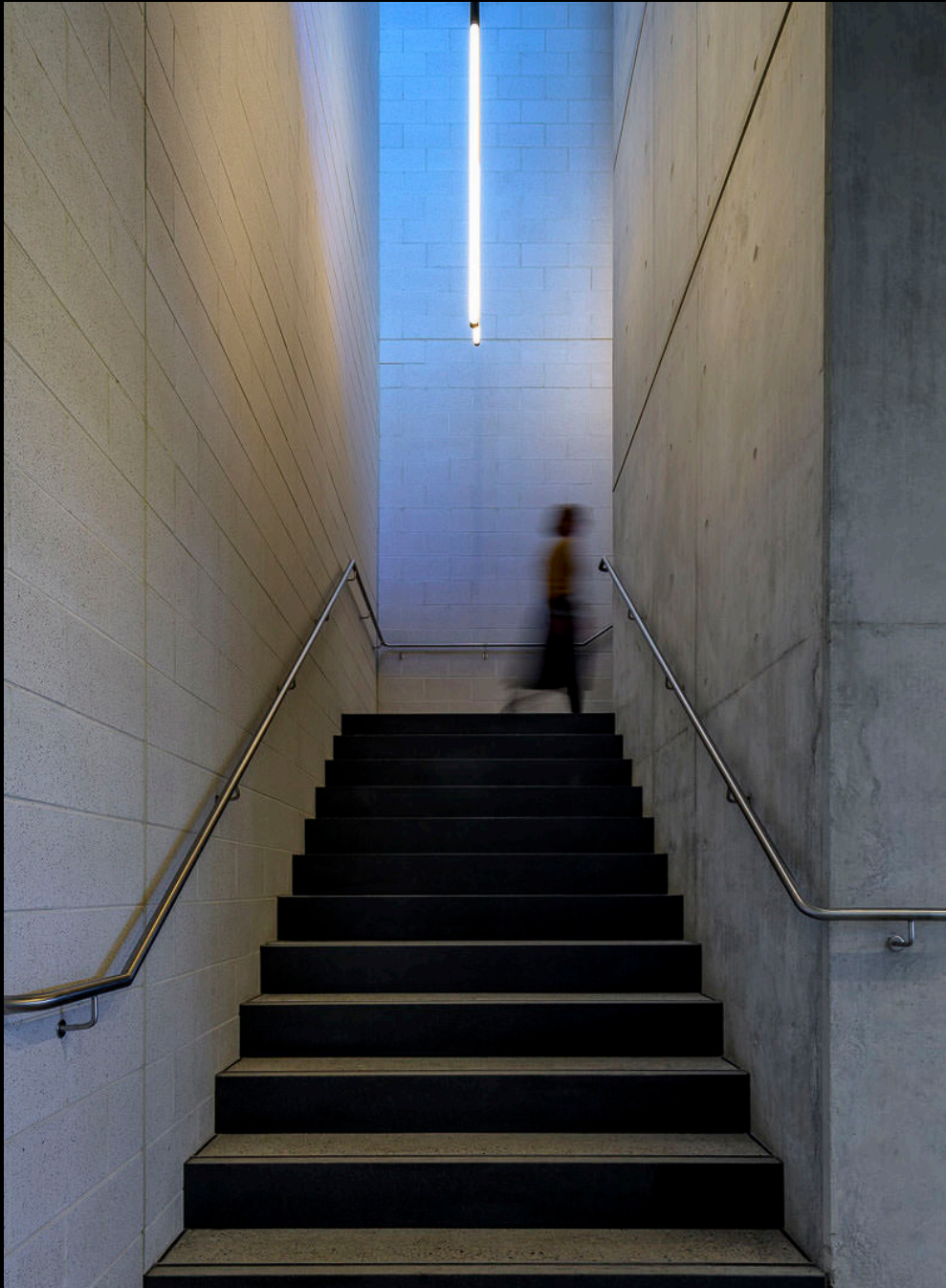
Our subcontractors are regularly assessed by a wide range of criteria including financials, industrial codes, insurance, safety, EMS and Modern Slavery.

Our Supply chain covers 6 key areas:

- Supply Chain Strategy and Planning
- Purchase, Procurement and Fulfillment
- Inventory Management
- Delivery and Customer Service
- Measurement and Evaluation
- Monitoring and Maintenance

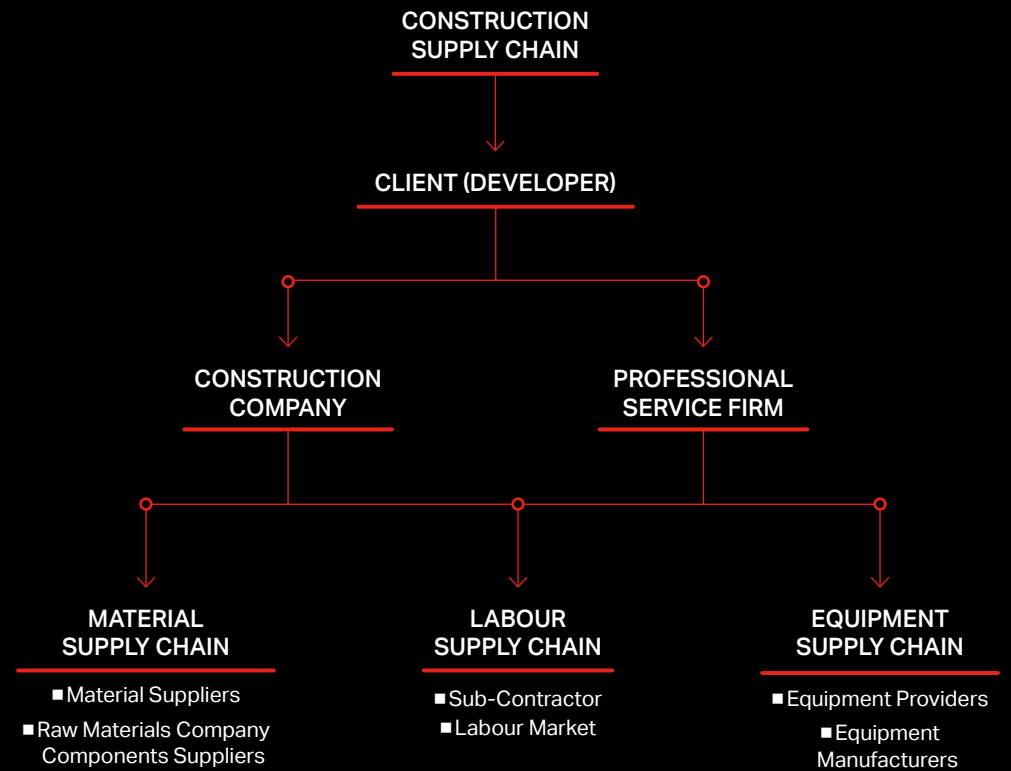


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Dangrove - Alexandria, NSW

# OUR SUPPLY CHAIN



# OUR SUPPLY CHAIN

## CONSTRUCTION SITE - PROJECT TEAM

### MATERIALS & LABOUR

Hoarding  
Scaffolding  
Access flooring  
Floor & walls inc. Carpet and flooring  
Ceilings and partitions  
Doors and frames  
Inter-tenancy stairs  
Concrete – supply and place  
Facade such as Glass, Aluminum, Terracotta, Fibre C, GRC and Aluminum Cladding  
Form-work  
L2 transfer wall prefab cage  
Podium facade  
Post tensioning  
Tiles and Stone  
Structural Steel  
Joinery  
Bathroom Pods  
Carpentry, Solar and other sustainable materials

### EQUIPMENT

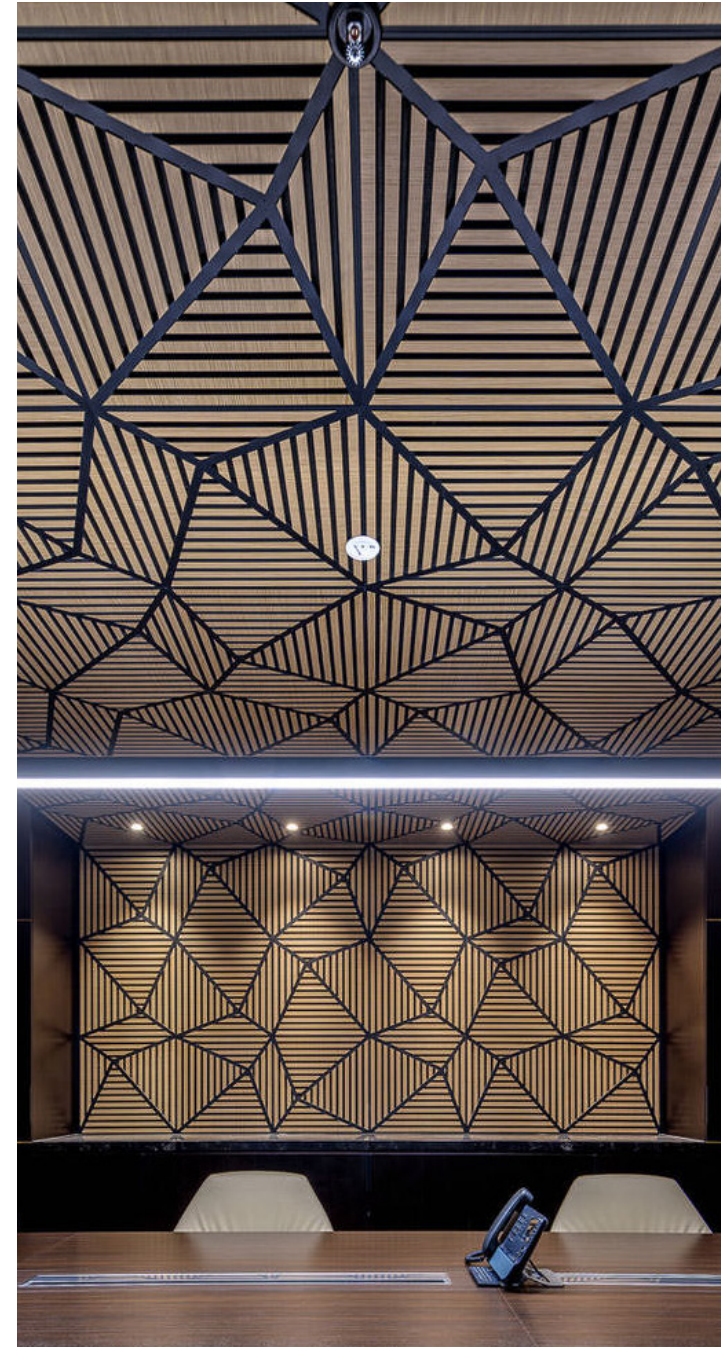
Hoarding and jump-form signage  
Loading Platforms  
Materials hoists  
Rubbish Bins  
Site Sheds  
Tower Cranes  
Jump Forms  
Mobile Plant

### SUBCONTRACTORS & LABOUR

Construction surveyors  
Traffic control  
Masonry works  
Electrical security comms services  
Fire protection services  
Hydraulic services  
Lift services  
Mechanical and electrical services  
BMS services Demolition / Earthworks  
Reinforcement fix  
Brick + Masonry Works  
Landscape Works  
Consultant Services - Architects/Design  
Carpenters  
Glaziers  
Heavy equipment operators  
Labourers  
Landscape, Painters, plasterers  
Steel fixers, welders

### MATERIALS

Steel  
Concrete  
Reinforcement Supply  
Timber  
Plasterboard  
Aluminum



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# OUR SUPPLY CHAIN

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## HEAD OFFICE

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### DEPARTMENTS

- WHSEQ + Management Systems
- Human Resources
- Marketing
- Finance
- Business Development
- Operations
- Estimating
- Administration & IT Systems

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### SERVICES

- Cleaning + Janitorial Services
- Security Services
- OH+S Uniforms
- IT equipment, Services + Software
- Insurance
- Loose Tools
- Mail + Cargo Transport
- Entertainment
- Passenger Transport
- Motor Vehicles
- Consultants

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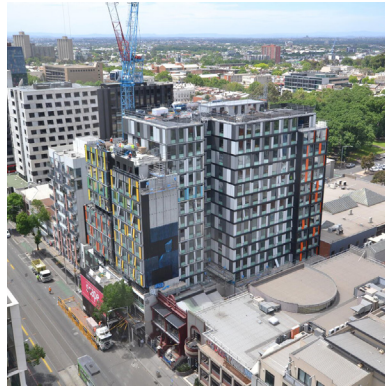




The Revy - Pyrmont, NSW



Infinity Estimating Team



Lincoln Square - Melbourne, VIC



Infinity Finance Team

## RISKS IN OUR SUPPLY CHAIN

Materials and construction services, including labour hire are the main areas of higher risk in our business.

Modern slavery can be linked to a number of factors pertinent to the construction sector as listed below:

- Prevalence of outsourcing, which can impact upon operational and supply chain transparency
- Contract terms with low margins and significant pressure on delivery times
- Reliance on a migrant workforce with limited local language competency and temporary visa arrangements
- Jurisdictional risk and industry risk in the supply of some construction materials
- Multiple sub-contracting arrangements with informal agreements
- Low barriers for entry for labour hire providers
- Dangerous or substandard working conditions, including:
  - Workers are not paid fairly or withheld entitlements
  - Workers may be required to work excessive hours
  - Workplace safety concerns

Our suppliers predominantly provide labour and materials, as well as services.

The materials used in the construction sector are often grown or manufactured in countries where modern slavery is a greater risk, which also creates risk in the latter tiers of our supply chain. The transport of these materials to Australia also creates modern slavery risk (noting that transport and logistics are inherently high risk for modern slavery).

The selection of construction materials is often made by either the customer (where a particular material is specified, which can only be sourced from one supplier) or the subcontractor supplying labour and materials. It is difficult for a construction company such as ours to have visibility across the multiple tiers in the supply chain of the numerous components and raw materials that are used on our construction sites.

We understand that each of our suppliers may have modern slavery risk in their own supply chains and this could mean that we are put at risk of being directly linked to modern slavery through the business practices of companies in the latter tiers of our supply chain.

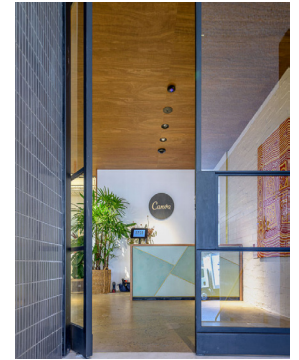
## PROCUREMENT PROCESSES



IRT - Wollongong, NSW



Bankstown RSL - Bankstown, NSW



Canva Office - Surry Hills, NSW

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 Infinity's Code of Conduct.

In addition, all prospective Suppliers 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. 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 employees, suppliers and the greater supply chain to reduce wherever possible any incident of modern slavery.



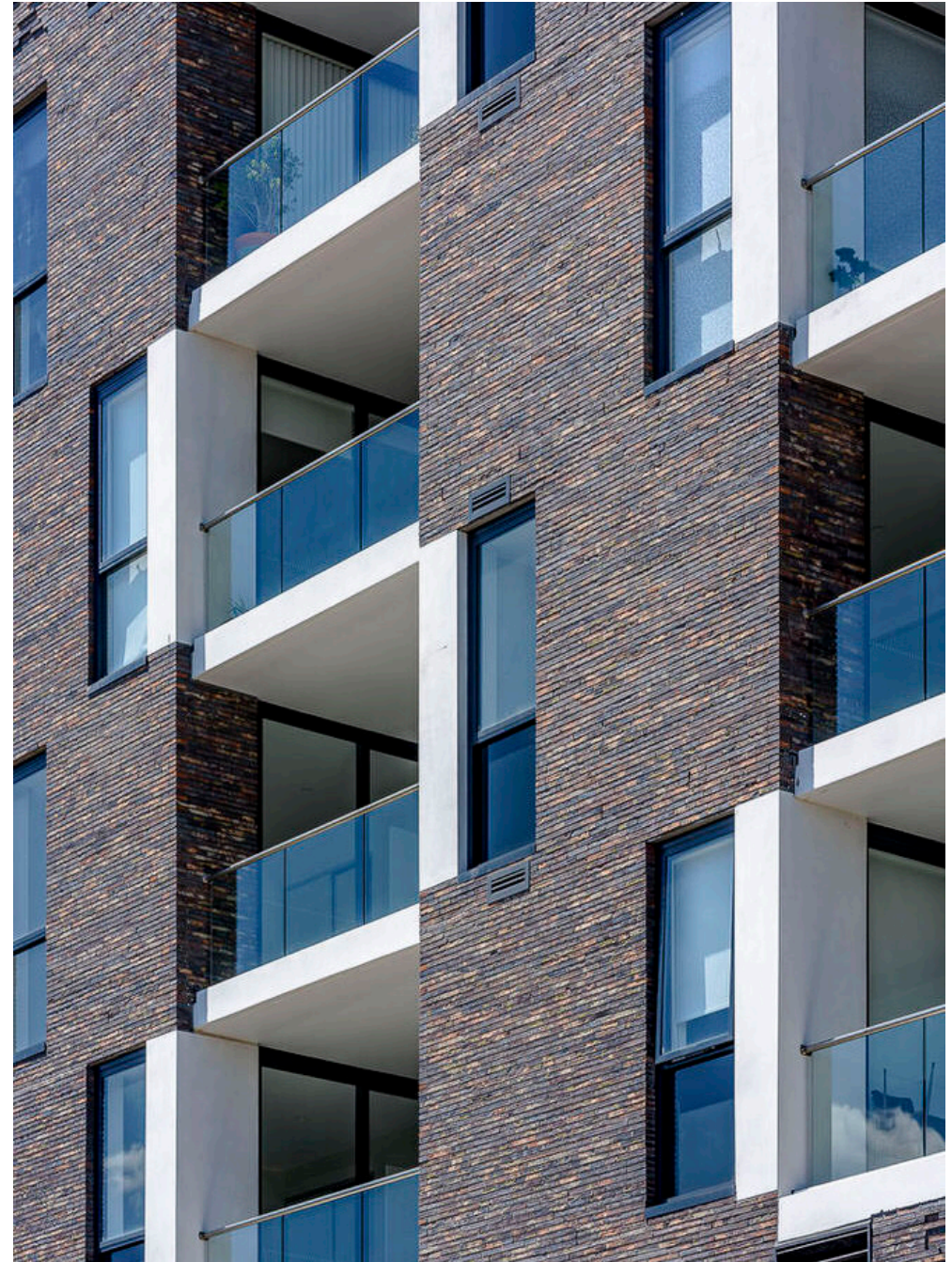
# ACTIONS



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The risk of modern slavery practices within our business are assessed on their potential cause, contribution or direct link to modern slavery through our operations and supply chains.



IRT - Wollongong, NSW

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# APPROACH TO RISK MITIGATION

## 1. CONDUCT DUE DILIGENCE

Thoroughly assess our supply chains, including subcontractors and suppliers, to identify any potential risks of modern slavery.

## 2. IMPLEMENT ROBUST POLICIES AND PROCEDURES

Develop and implement clear anti-modern slavery policies that outline the company's commitment to ethical labor practices.

## 3. TRAINING AND AWARENESS

Educate employees and stakeholders about the risks of modern slavery and how to identify and report any suspicious activities.

## 4. SUPPLY CHAIN TRANSPARENCY

Promote transparency within the supply chain and establish mechanisms for monitoring and auditing labor practices.

## 5. COLLABORATE

Collaborate with industry associations, and other stakeholders to share best practices and collectively address the issue. By addressing the risks of modern slavery in construction company operations, organizations can contribute to the eradication of this heinous practice and

uphold ethical labor standards within the industry.

## OUR APPROACH TO GOVERNANCE

We have a comprehensive set of policies and procedures that articulate our values, ways of working and expectations of our team and suppliers that are reviewed regularly. This policy framework ensures that our team members and suppliers clearly understand our expectations, and equally that they can recognise when they are being treated in a way that is inconsistent with these expectations and understand how to raise a grievance or complaint. The following policies are those that are most relevant to preventing, mitigating, and remediating risks of modern slavery among our team members and workers in our supply chains.



Mayflower Reservoir VIC

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# SUMMARY GOVERNANCE

## WHISTLE BLOWER POLICY

Infinity Constructions encourages the reporting of any matters which may be considered unethical, illegal or an act of serious wrongdoing, ('Reportable Conduct'). Infinity provides protections and measures so that those persons who make a report may do so confidentially and without fear of intimidation, disadvantage, or reprisal.

## CODE OF CONDUCT POLICY

At Infinity Constructions 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.

Mandatory on-line Code of Conduct training is undertaken by all our employees within the first week of employment. Our Intranet portal contains a copy our current Modern Slavery statement. In addition, we encourage all of employees to raise any breaches of the Code of Conduct via our Whistle Blower policy.

## EQUAL OPPORTUNITY POLICY

Ensuring that all persons seeking employment are treated equitably and are not subjected to any form of unlawful discrimination or harassment.

## TENDER INTERVIEW & EVALUATION

### Supplier Questionnaire:

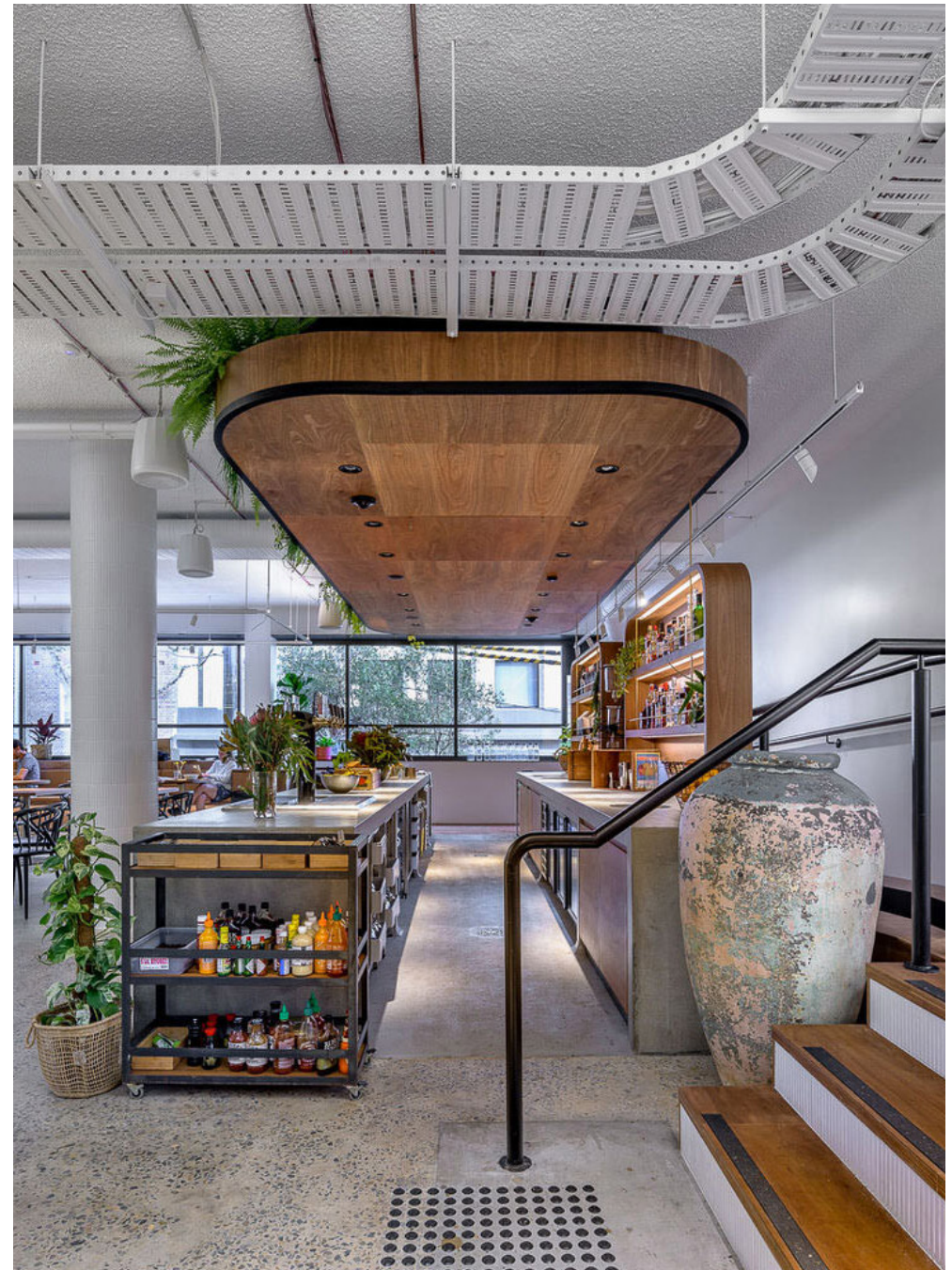
Infinity Constructions on-boarding of potential suppliers are now required to respond to specific questions in modern slavery compliance as part of Infinity's sub-contractors tender.

### Evaluation Report:

- This includes acknowledgment & agreeing to Modern Slavery precautions in Infinity's contract documentation.
- Warranting they will not utilise modern slavery directly or within their supply chain
- Acknowledging they are not aware of any modern slavery risks in their operations or supply chain.
- Agreeing to notify Infinity if they become aware of any Modern Slavery in their operations or supply chains
- Agreeing to participate in Modern Slavery Audit.

## WORK, HEALTH, SAFETY AND WELFARE POLICY

Infinity Constructions is committed to providing a healthy and safe workplace and to eliminating conditions and incidents, which could result in personal injury or ill health via continual improvements to the WH&S practices in our business.



Canva Office - Surry Hills, NSW

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Judith Nielsen - Chippendale, NSW

## MEASUREMENT & EVALUATION ACTION PLAN

MILESTONES	KPI	COMPLETION	TARGET FY23
Policies and Procedures	Modern Slavery Statement	Published FY20	Updated annually
	Whistle Blower Policy	Published FY21	Ongoing
	Code of Conduct Policy	Published FY21	
	Employee Code Of Conduct	Published FY21	Upgraded FY23
	Supplier Code of Conduct		
Due Diligence	Post Tender Interview Questions	Published FY21/22	Ongoing
	Modern Slavery Questionnaire issued to selected suppliers/subcontractors	Published FY21	
	Right to work checks as part of PTIs (Pre Tender Interviews)	Completed FY20	Ongoing
	Modern Slavery Strategy and Review meetings & incorporate into company risk matrix		To be completed FY23 /24
	Monthly Business Report		Commenced FY23
Training and Education	Internal staff educational training sessions	Information on Hammertech for employees & suppliers, English / Chinese posters Modern Slavery signs at all sites. Staff training days held in Syd and Melb. Intranet Share point portal introduced	On-going more education, Mobile app training, tool box talks, informational available on all portals. Staff head office training day
	Whistle Blower + Modern Slavery + Code of Conduct Policies distribution via Intranet (Online module)	Published FY20	Ongoing
	Site / Office Posters		To be completed Build. Above. Beyond.





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Celebrating Over 30 Years.



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