

Modern Slavery Statement

2024

INFINITY

Build. Above. Beyond.



This Statement is submitted by Infinity Constructions Group (ABN 95 111 941 792) on behalf of all eligible Infinity Construction Group reporting entities, as defined in Commonwealth Modern Slavery Act 2018 (MSA)

We do this as a complying entity, a demonstration of best practice and consistent with the values we hold as a responsible, privately owned organisation.



01

ABOUT INFINITY CONSTRUCTIONS GROUP



OUR STORY

Infinity Constructions has been operating continuously since 1992. We are a Tier 2 commercial design and construction company operating in the Sydney and Melbourne markets.

We have built our reputation as a quality builder that places outstanding customer service at the heart of our business. We are motivated by delivering excellence to our clients.

We serve a wide range of customers including developers, end user clients, institutional clients and clients who develop, lease and hold the assets.

We primarily operate in \$10m-\$200m sized projects in Commercial, Industrial, Accommodation ie. PBSA, Hotels, Aged Care & Seniors Living, Hospitality and Community.

Our Project Delivery systems include Design & Construct often with novated consultants, Cost Plus and Lump Sum construction contracts.

Our continued growth over the last 33 years is primarily due to our loyal client base who trust us to deliver their innovative and award-winning projects.

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 01 January 2024 to 31 December 2024 pursuant to the Modern Slavery Act 2018. (Cth)(Modern Slavery Act).

This statement sets out what Infinity Constructions Group Pty Ltd has done in the 01 January 2024 to 31 December 2024 to work towards ensuring that slavery and human trafficking is not taking place in any part of its business or supply chains.

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.



OUR VISION

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

OUR VALUES



Our core values are the building blocks to the success of Infinity, 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.



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.



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.



SUSTAINABILITY

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



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.

OUR OPERATIONS

**600+**

Projects Built

**2**

Office Locations (NSW & VIC)

**130+**

Infinity Staff

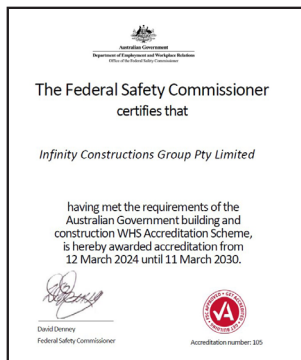
**4.5-Star** Gold iCIRT Rating**8500**

Australian Suppliers

**0**

International Suppliers

OUR ACCREDITATIONS



02

OUR STRUCTURE, OPERATION & SUPPLY CHAIN

OUR STRUCTURE

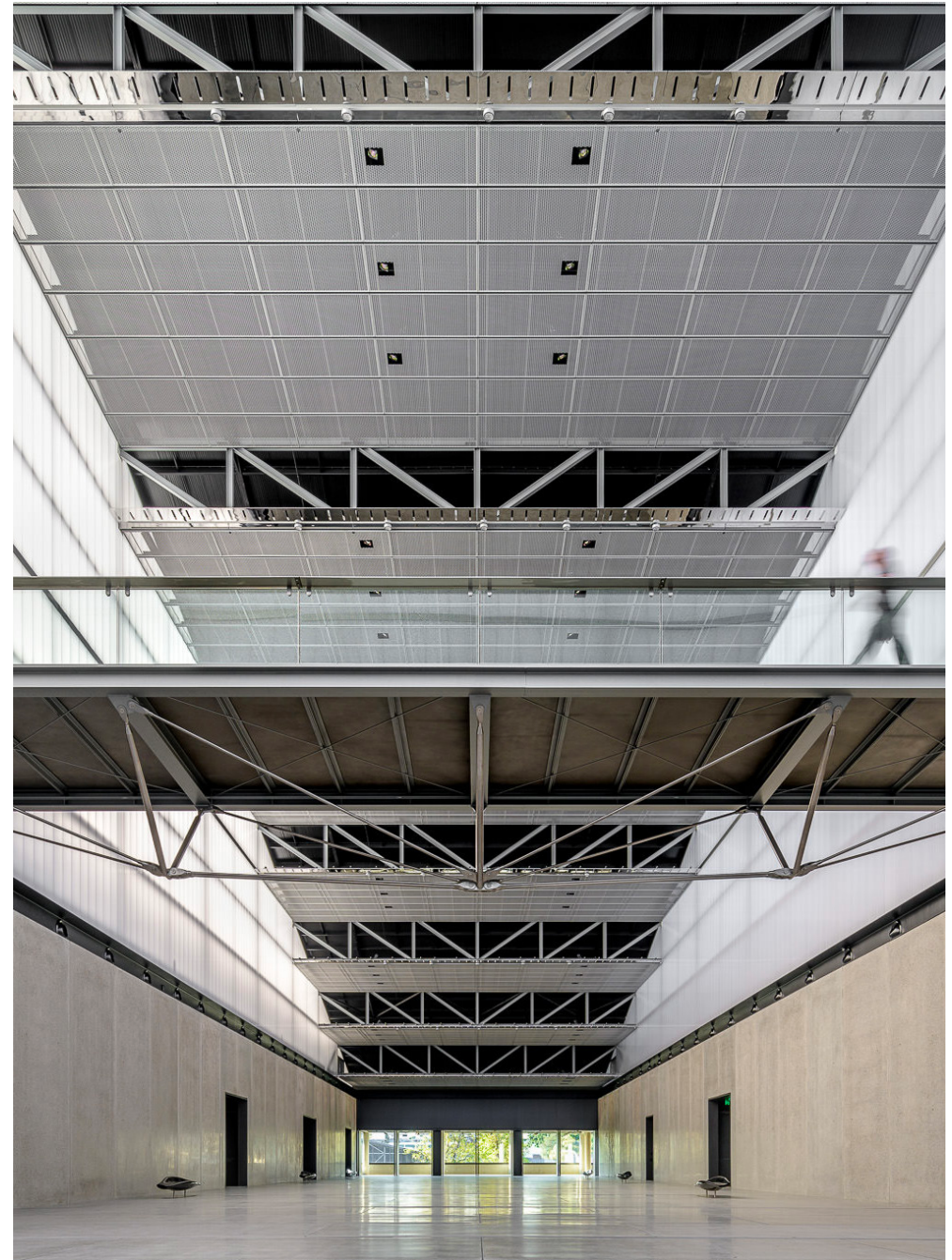
Infinity Constructions Group consists of two trading companies ICG (ABN: 95 111 941 792) and ICGM (ABN: 58 610 586 126)

Infinity Constructions Group Pty Ltd is a privately held company committed to driving positive change in the Australian Construction Industry (predominately in NSW). It is owned by Directors all whom are actively involved in the day to day management and operation of business.

Each Infinity company divisions operates under it's own ABN and is governed by the same management system that oversee Infinity Construction Group operates.

OUR OPERATIONS

1. Infinity Constructions Group is headed by a Managing Director and Senior Leadership Team (who includes a Group General Manager) who exercise various levels of autonomy within the disciplines of Infinity's Integrated Management System (IMS), including the HSEQ & ESG frameworks.
2. This level of managerial flexibility enables teams to respond promptly to changing market conditions, yet remain accountable to our risk management and governance process requirements of client, regulator and company.
3. Infinity is certified to International and Australian (ISO45001:2018) Quality (ISO9001:2015) and Environmental Standards (ISO14001:2015) and also accredited by the Office of the Federal Safety Commission (OFSC).



OUR OPERATIONS

Our reporting entities (listed below) remains unchanged from the previous year.

Infinity Constructions Reporting Entities	Infinity Constructions Voluntary Reporting Entity
Infinity Constructions Group	Infinity Constructions Group Melbourne

OUR SUPPLY CHAIN

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 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





OUR SUPPLY CHAIN

OUR SUPPLY CHAIN

CONSTRUCTION SITE - PROJECT TEAM

SUB-CONTRACTORS & LABOUR

Hoarding
Scaffolding
Floor & Walls inc. Carpet and flooring
Ceilings and partitions
Doors and frames
Concrete – supply and place
Facade such as Glass, Aluminum,
Terracotta, Fibre C, GRC and Aluminum Cladding
Form-work
Post tensioning
Tiles and Stone
Structural Steel
Joinery
Bathroom Pods
Carpentry

EQUIPMENT

Hoarding and jump-form
Loading Platforms
People and materials hoists
Rubbish Bins
Site Sheds
Tower Cranes
Mobile Crane
General Plant Hire & Access Equipment
Concrete pumps

SUBCONTRACTORS & LABOUR

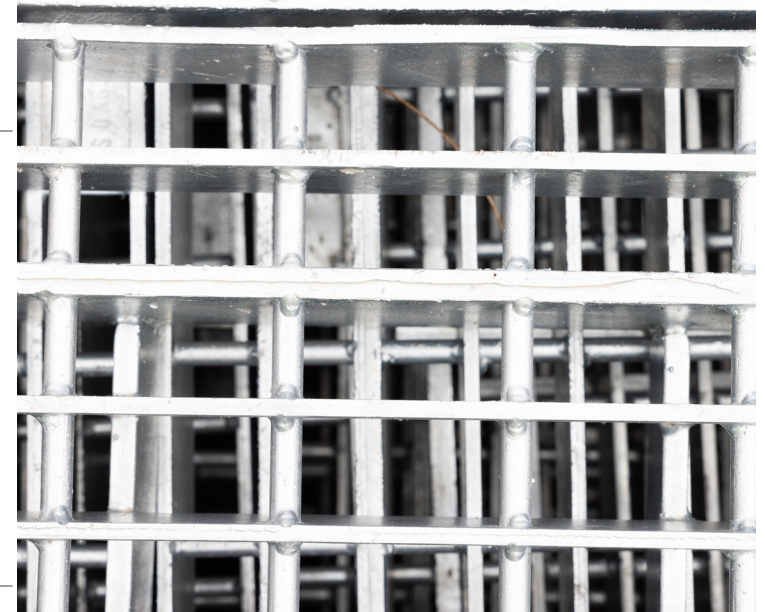
Construction survey
Traffic control
Masonry works
Painting
Electrical security comms services
Fire protection services
Hydraulic services
Lift services
Mechanical and
BMS services
Demolition / Earthworks
Reinforcement fix
Landscape Works
Consultant Services - Architects / Design

MATERIALS

Steel
Concrete
Reinforcement Supply
Timber

ROOFING

Steel
Membranes



OUR SUPPLY CHAIN

HEAD OFFICE

DEPARTMENTS

WHSEQ + Systems
Human Resources
Marketing
Finance
Business Development
Contract Administrators
Estimating
Administration

SERVICES

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



03

IDENTIFYING RISKS OF MODERN SLAVERY IN OUR SUPPLY CHAIN

PROCUREMENT SUMMARY & PROCESSES

Of Infinity's FY24 total procurement spend of \$120m, approximately 6% was spent by groups head office as corporate expenses and 94% project delivery based.

For the purpose of this report, Infinity Constructions has assessed the modern slavery risks associated with both corporate and projects using the same risk-based approach.

During FY24, Infinity Constructions engaged the services of approximately 800 suppliers and service providers accounting for just in excess of \$110m in total spend.

Our current direct suppliers (tier 1) vendor management system retains in excess of 8,500 Vendors of which 1400 have been used at least once in the past 3 years.

Given the complexities of our construction business and project types, we have a concentration of longer term, higher value spend construction contracts with suppliers and service providers who have worked with Infinity for over a decade

In FY24 our top 100 suppliers accounted for 80% of our total spend, compared to 85% and 83% prior years.

This year our top 200 suppliers account for 92% of our total spend.

The concentration and consistency of our suppliers is assisting us with improving our visibility of our supply chain.



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.

Our Sub-contracts stipulate compliance with Modern Slavery Act as another layer of legal obligation for our suppliers.

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.

RISKS IN OUR OPERATIONS



The risk of modern slavery practices within our business were assessed on their potential to cause, contribute to or be directly linked to modern slavery through our operations and supply chains.

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

RISKS IN OUR OPERATIONS

IDENTIFIED RISKS	RISKS	RISK LEVEL
Casual or Contract workers engaged directly by Infinity	Infinity Constructions workforce is majority permanent, with <10% casual contractors.	Low
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's operations are not seasonal, with consistent workforce turnover during the reporting period.	Nil
External Auditing	Infinity Constructions' 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, we are accredited and audited by Office of Federal Safety Commissioner (FSC).	Low
Materials and Products	Materials sourced from regions of known human rights risks - windows and facades, solar PV panels, electrical supplies' Plant and equipment	Medium
Service engaged by Infinity Constructions	Infinity Constructions relies on services including recruitment, legal, cleaning services, construction, property maintenance waste disposal and equipment maintenance. 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
Staff	Our executive leadership team meets regularly to discuss business risk, which ensures that they have visibility of the risks in our operations and the controls adopted to manage those risks 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. Our employee induction processes also ensure that new employees confirm they have read and understood our policies and minimum standards. Our employee on-boarding processes include working rights employment checks managed by our Human Resources group. Internal pay parity reviews are undertaken annually against industry benchmarks. Our staff are all located in Australia.	Low

RISKS IN OUR SUPPLY CHAIN

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

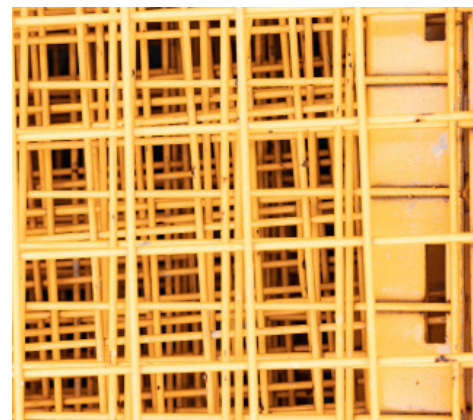
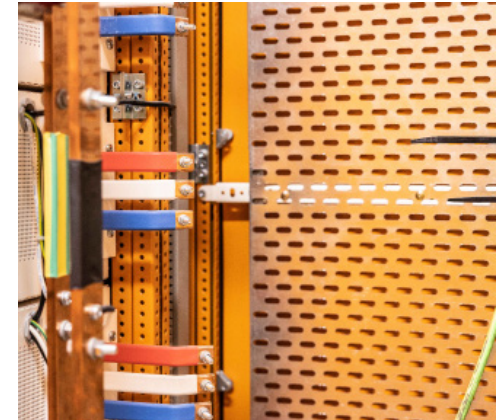
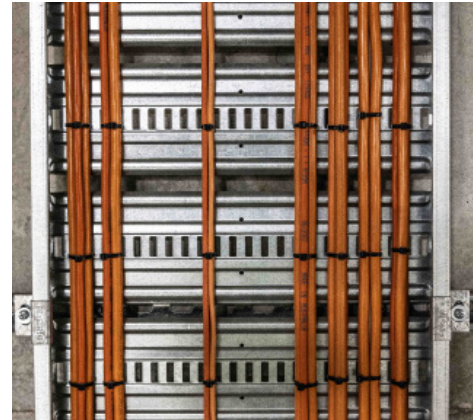
Modern slavery can be linked to a number of factors pertinent to the construction sector as listed below:

- 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 subcontractors and 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 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.



04

ACTIONS WE HAVE TAKEN TO ADDRESS MODERN SLAVERY

SUMMARY OF APPROACH

WHISTLE BLOWER POLICY:

Infinity Constructions 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 Whistle Blower policy is to prevent and protect disclosed matters, outline the process by which Infinity 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.

CODE OF CONDUCT POLICY:

At Infinity 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 and compulsory Modern Slavery training for all new employees.. In addition, we encourage all of employees to raise any breaches of the Code of Conduct via our Whistle Blower policy.

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 Constructions if they become aware of any Modern Slavery in their operations or supply chains
- Agreeing to participate in Modern Slavery Audit.

SUPPLIER INDUCTION:

All sub-contractors that attend site have to complete a company level induction including modern slavery induction.

EQUAL OPPORTUNITY POLICY:

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

WORK, HEALTH, SAFETY AND WELFARE POLICY:

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

05

ASSESSING EFFECTIVENESS OF OUR ACTIONS

MEASURING EFFECTIVENESS

FY24 PROGRESS

KEY ACTIONS	PROGRESS	DETAILS
1. Continual improvement in our Modern Slavery awareness training for Infinity Employees	Ongoing	All employees have completed an online Modern Slavery training course. All new employees complete as part of induction process. Onsite signage - Modern Signage in multiple languages highlighting the risks of Modern Slavery, what to look for and how to report. All subcontractors that attend our construction sites have to complete a company level induction which includes Modern Slavery section (commenced 28th May 24)
2. Policies and Procedures - Modern Slavery Statement - Whistle Blower Policy - Code of Conduct Policy - Employee Code of Conduct - Supplier Code of Conduct	Ongoing	Subject to change according to changes in legislations.
3. Due Diligence - Post Tender Interview Questions - Modern Slavery Questionnaire issued to selected suppliers / sub-contractors. - Right to work checks as part of PTIs (Pre Tender Interviews) - Modern Slavery Strategy and Review meetings and incorporate into company risk matrix Monthly Business Report	Ongoing	Subject to change according to changes in legislations.

MEASURING EFFECTIVENESS

FUTURE PLANS FY25 AND BEYOND

KEY ACTIONS	PROGRESS	DETAILS
1. Continual improvement in our Modern Slavery awareness training for Infinity Employees	Plans	Continue to conduct compulsory online modern slavery training for all Infinity employees All new employees complete as part of induction process. Onsite signage - Modern Signage in multiple languages highlighting the risks of Modern Slavery, what to look for and how to report. Have clear site and office signage promoting whistleblower details
2. Policies and Procedures • Modern Slavery Statement • Whistle Blower Policy • Code of Conduct Policy • Employee Code of Conduct • Supplier Code of Conduct	Plans	Continue to monitor changes in legislations. Review and update our policies and procedures each year to take into account any new trends or understandings of modern slavery.
3. Due Diligence • Post Tender Interview Questions • Modern Slavery Questionnaire issued to all selected suppliers / subcontractors. • Right to work checks as part of PTIs (Pre Tender Interviews) • Modern Slavery Strategy and Review meetings and incorporate into company risk matrix Monthly Business Report	Plans	Subject to change according to changes in legislations. Continue to include modern slavery questions in pre-tender interviews or documentation. Explore the commissioning of a third party auditor to assist our supply chain and other business relationships mapping beyond tier one. Explore new areas of collaboration as we work with project partners and suppliers to implement risk mitigation measures in our supply chain. We recognise due diligence enquiries with our subcontractors and suppliers are the single most important step in avoiding, identifying and remediating instances of modern slavery in our operations and supply chain. Explore collaboration opportunities with industry peers in areas where a joint approach will have most impact

06

GOVERNANCE & AUTHORITY

GOVERNANCE & AUTHORITY

The key policies and documents that guide and govern our Modern Slavery, ESG and other social initiatives are listed below.

Infinity Continually reviews these policies, codes and documents to ensure they meet ours and our clients' expectations and all regulatory requirements.

Modern Slavery Policy	Whistleblower Policy
Code of Conduct Policy	Health & Safety Policy Statement
Equal Employment Opportunity Policy (EEO)	Environmental Policy Statement
Statement of Support for Indigenous Participation	Workplace Bullying, Harassment and Discrimination Policy
Subcontractor and Consultancy agreements	

This statement was approved by the undersigned on 07 March 2025 and has the full support of the Infinity Constructions Board and leadership team.



Alan Yazbek
Managing Director



Jason Chung
Chief Financial Officer



OUR CONTACTS

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