



**MODERN
SLAVERY
POLICY**

4:PM



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MODERN SLAVERY POLICY

This voluntary statement covers the activities of 4PM Projects Pty Ltd (ABN 55 618 377 594) (4PM) to understand and implement actions to minimise the risk of modern slavery and human trafficking in our operations and supply chain.

This inaugural Modern Slavery Statement for 4PM Projects is presented in alignment with the Modern Slavery Act 2018 (Cth). The primary objective of this statement is to articulate our commitment to establishing robust frameworks and processes aimed at mitigating the risk of modern slavery within both our business operations and supply chain.

While 4PM Projects is currently not obligated to produce a mandatory statement under the Act, given that it falls below the \$100 million income threshold for the financial year 2022/23, we proactively choose to address our modern slavery risks and obligations.

This voluntary statement underscores our organisational values of collaboration, integrity, and responsibility where honesty, transparency, and authenticity guide all aspects of our work.

We believe that this proactive approach aligns with our commitment to ethical practices and responsible corporate citizenship.

BUSINESS OVERVIEW

4PM Projects is an independent project management agency known for our proactive approach and risk mitigation. We manage construction projects including commercial fitouts, hotels and industrial facilities.

PURPOSE

The objective of this policy is:

- Prevent, detect, and respond to the risk of Modern Slavery within 4PM Projects, its supply chain, or any other business relationships through the implementation of mitigating controls.
- Demonstrate 4PM Project's unwavering commitment to engaging in business solely with entities that adhere fully to the provisions of the Act.
- Ensure continuous compliance with the Act, subject to any amendments that may be introduced over time.

SCOPE

This policy and associated procedures apply to all directors, staff and contractors working for the company.

DEFINITION OF MODERN SLAVERY

Modern Slavery constitutes both a criminal offense and a violation of fundamental human rights, as outlined in the Australian Modern Slavery Act of 2018. The Act encompasses eight forms of severe exploitation, namely:

- Trafficking in persons
- Slavery
- Servitude
- Forced marriage



- Forced labour
- Debt bondage
- Deceptive recruiting for labour or services

The worst forms of child labour, encompassing situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

POLICY STATEMENT

4pm Projects confirms that, in performing its obligations as a consultant to perform Project Management services, or doing all things necessary or convenient for, or otherwise directly or indirectly related to, the performance of such obligations, it will comply with all:

- 1.1. Australian Modern Slavery Laws; and
- 1.2. Foreign Modern Slavery Laws applying in the location or locations in which such acts or omissions are, or are to be, performed.

4PM Projects complies and uses its best endeavours to ensure that all consultants, contractors and suppliers comply with all Modern Slavery Laws in force in jurisdictions relevant to consultants, contractors and suppliers.

4PM Projects will notify our clients if it becomes aware that the contractor has engaged, or any of their subsidiaries, sub-contractors or suppliers have engaged, in Modern Slavery.

MODERN SLAVERY RISKS

We commenced a review of potential risks of modern slavery practices across our operations and supply chains. During the assessment process, we have considered/are considering risks that may possibly cause, contribute and/or be directly linked to modern slavery practices.

We are also taking into consideration other risk factors such as the sector, industry, types of products and services, geographic locations and business models.

4PM Projects has been able to identify areas with no or low risk, for example, in any operational activities that are directly undertaken by 4PM Projects employees and covered by our internal processes. An initial assessment of 4PM Project's main risks in relation to Modern Slavery relate to the procurement of building services and fixtures and fittings.



SUPPLY CHAIN RISKS

4PM Projects has implemented stringent procurement and legal processes that are strategically designed to minimise the risk of modern slavery in both our operations and supply chain. We have identified the following categories are moderate to high risk in our supply chain:

- Contractors and subcontractors who provide contracting services such as fitout work.
- Goods procured from overseas such as fixtures and fittings.
- Cleaning and building management services.

ADDRESSING RISKS

4PM Projects are actively integrating our strategy to address the diverse risks associated with modern slavery practices into our corporate governance processes, particularly within procurement and risk management. This proactive approach ensures that our organisation implements robust and effective processes deeply embedded in our business operations.

To reinforce our commitment, 4PM Projects has already modified template service agreements and tender documentation, emphasising adherence to modern slavery obligations for our service providers.

PROCEDURES

PROCUREMENT OF GOODS AND SERVICES

The procurement framework serves as the primary mechanism for engaging suppliers within the 4PM Projects. This framework incorporates due diligence measures to assess suppliers' compliance with the Modern Slavery Act. 4PM Projects is committed to conducting procurement activities in a manner that, to the extent reasonable, ensures the sourcing of goods and services from entities that uphold their obligations under the Act. The level of due diligence in the procurement process will vary based on the nature of the goods or services being acquired. Examples of due diligence measures may include:

- Requesting a self-assessment or attestation from the supplier, confirming compliance with various provisions of the Act.
- Warrant that it has not been convicted of a Modern Slavery offence.
- Seeking a copy of the supplier's most recent Modern Slavery statement, if applicable.
- Gathering details about the structure and operations of the supplier's supply chain.
- Soliciting information about actions taken by the supplier to manage and address modern slavery risks in their supply chain.

In instances where a proposed contract is integral to the procurement process, careful consideration must be given to incorporating provisions that ensure compliance with the Modern Slavery Act. This proactive approach underscores our commitment to ethical and responsible business practices.



TRAINING

4Pm Projects will provide training to inform employees of this policy and what is considered Modern Slavery.

PROTECTIONS

4PM Projects will protect those individuals that report or identify Modern Slavery occurring within the organisation and supply chains.

FUTURE COMMITMENTS

Looking ahead, our forthcoming commitments for the next year include finalising the assessment of modern slavery risks within our supply chain, initiating stakeholder engagement on this critical issue.

Additionally, we aim to incorporate specific requirements into existing assurance processes, thereby fortifying our commitment to combatting modern slavery in all aspects of our operations and supply chain.

RELATED POLICY GUIDELINES OR DOCUMENTS

- 4PM Projects contracts including provision requiring disclosure of modern slavery risks
- Supplier Code of Conduct
- Modern Slavery Reporting template
- Whistle-blower Protection Policy

CHANGE HISTORY

AUTHOR	DATE	VERSION	APPROVED BY
Home by 5 Pty Ltd	24/11/2023	V.1	Anthony Brown



ACCREDITATION

ISO Accreditation QAS International

Quality Management ISO 9001: 2015

Occupational Health & Safety
ISO 45001:2018

Integrated Management System
PAS99:2012

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