

Modern Slavery Framework

The Modern Slavery Act 2018 came into effect on 1st January 2019 to protect those that may be vulnerable to such exploitative practices. It is estimated that 49.6 million people globally are living in modern slavery conditions, with an estimated 41,000 people in Australia alone (walkfree.org, 2023 Global Slavery Index). Anyone can be vulnerable to modern slavery; those who are affected by modern slavery are often hidden in plain sight. Forced labour is common in industries requiring physical labour such as construction.

Modern slavery is 'a serious crime and a violation of fundamental human rights'(dss.gov.au). It takes various forms, such as forced and compulsory labour, slavery, servitude, and human trafficking, all of which deprive an individual of their liberty and/or exploits them for gain.

About us:

CRA Building Services (CRA) is a dynamic South Australian-owned and operated business. Over the past few years, CRA has experienced unprecedented growth that has seen it establish itself as a builder of choice within the Insurance Repair Industry in SA, NSW, and Victoria.

A family-based company, we're on a mission to consistently deliver our trademark customer experience through quality insurance building solutions. Our vision is to make a meaningful difference in our local insurance repair landscape by being a trusted and caring partner for those in need.

CRA is committed to limiting the risk of modern slavery occurring in its operations, ensuring there is transparency and has a robust approach to tackling modern slavery throughout our business and supply chain.

CRA expects that our employees and suppliers share our commitment to help ensure modern slavery does not exist in our operations and supply chain.

Identifying Risks (internally) and Risk Assessment

CRA has assessed its direct modern slavery risk to be low and continually ensures that all our direct employees have the right to work in Australia. This then safeguards them to be highly protected with strict regulations and employee protection under such bodies as Fair Work Australia and the National Employee standards (NES).

CRA's Modern Slavery Officer mapped CRA's supply chain, to identify any areas of potential risk. The supply chain was broken down into two tiers –

Tier One refers to direct suppliers and subcontractors that CRA obtains goods and services from.

Tier Two refers to the suppliers that CRA's subcontractors utilise.

CRA have identified the following as our supply chain:

- Building services subcontractors
- Building materials suppliers
- Office equipment suppliers
- Facilities management services
- Uniform suppliers

Please refer to the Supply Chain Map from the Modern Slavery End of Financial Year (EOFY) Report for more detail.

Subcontractors:

Our subcontractors have been assessed to be at a lower risk for modern slavery occurring within their supply chains as their operations are Australian based which requires compliance with the Modern Slavery Act.

Goods and materials suppliers:

Most of the goods and materials in our Supply Chain are sourced from large suppliers such as Bunnings; and are primarily purchased by our subcontractors rather than directly by CRA, which minimise our risk in two ways:

- Large suppliers have their own Modern Slavery processes in place.
- Subcontractors purchasing goods and materials have their own Modern Slavery obligations with regards to their supply chain.

Addressing Modern Slavery

Staff:

CRA commences training on our Modern Slavery framework and processes at staff inductions and the onboarding process, then subsequently through our annual Modern Slavery EOFY Report, Code of Conduct and Whistleblower policy, which outlines processes and communication channels for our staff to disclose misconduct without fear of reprisal.

Subcontractors:

All our subcontractors acknowledge the risks associated with Modern Slavery and minimise these risks as part of their commitment to our compliance requirements as part of their onboarding obligations which is acknowledged in their Subcontractor Agreement.

As part of our ongoing commitment to compliance, we have dedicated people (Subcontractor Manager and Modern Slavery Officer) to ensure our requirements are adhered to. In addition to this, CRA conducts Safety Audits as an internal KPI which allows us to monitor all the obligations detailed within our sub-contractor contract.

Mitigation Measures

As part of our commitment to oppose all forms of Modern Slavery and to mitigate the chance of it occurring within our organisation or throughout our supply chain, we have the following measures in place:

- Appointment of a dedicated Modern Slavery Officer.
- Continual monitoring of legislative and governance changes followed by reviewing CRA policies and procedure accordingly.
- Regular review of our employee induction and training processes to continue to educate our staff.

The Modern Slavery Officer in collaboration with the Chief Executive Officer and Subcontractor Manager will conduct the following associated activities:

- Conduct regular audits of key subcontractors and suppliers.
- Conduct annual internal reporting to identifying key areas of risk or non-compliance for remedial action.