An aerial photograph of a modern glass skyscraper in a city at dusk. The building is the central focus, with its glass facade reflecting the sky and surrounding buildings. The sky is a mix of dark blue and grey, with some light clouds. In the foreground, there are palm trees and a street with cars. Other buildings are visible in the background, some with solar panels on their roofs.

KANE

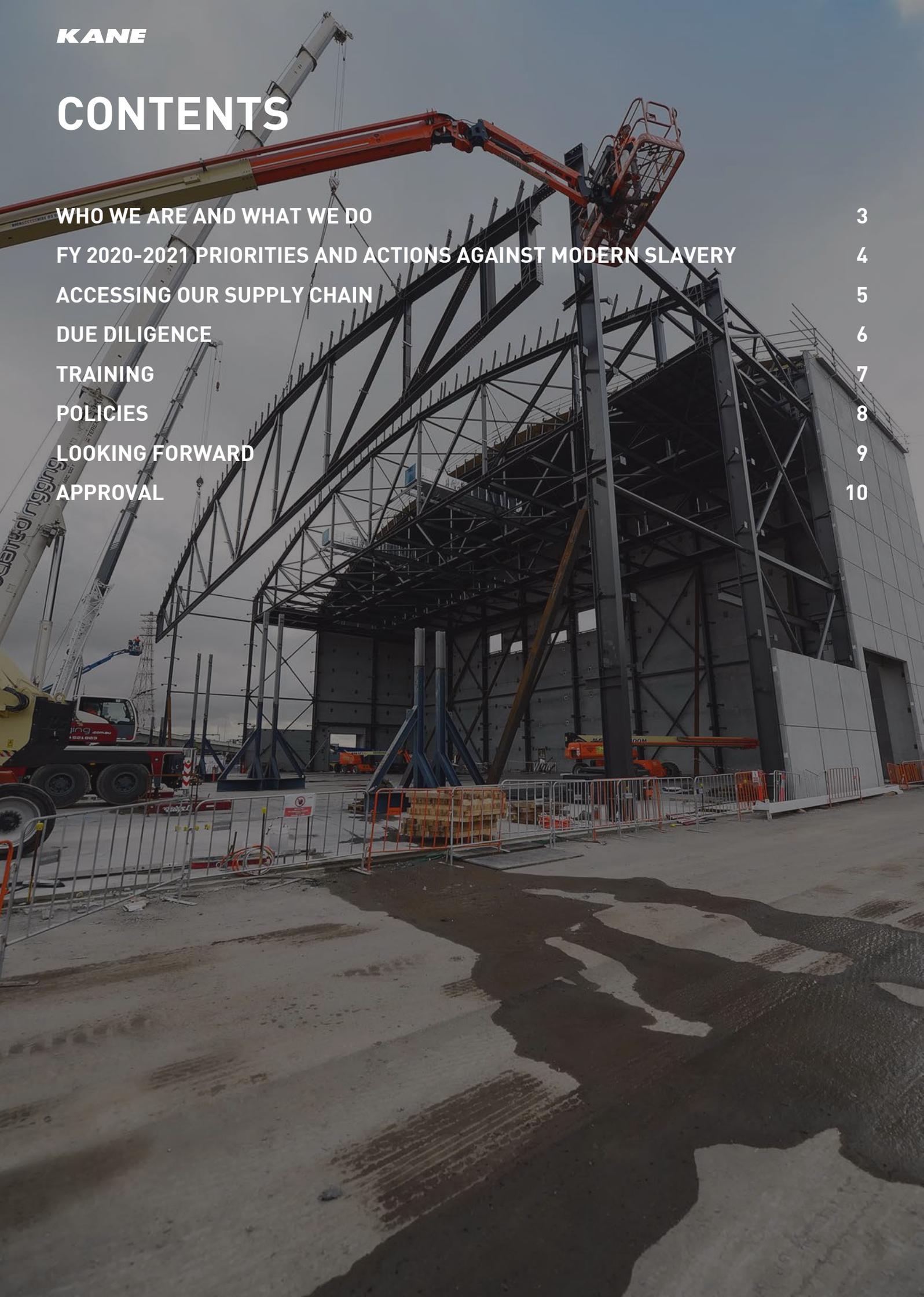
**MODERN
SLAVERY
STATEMENT**

FINANCIAL YEAR 2020 - 2021

**Kane Construction Pty Ltd
Kane Constructions (QLD) Pty Ltd
arete Australia**

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WHO WE ARE AND WHAT WE DO

Kane Constructions are a leading mid-tier privately owned commercial construction company. We operate throughout the east coast of Australia with offices in Melbourne, Sydney, Brisbane and Canberra with approximately 500 employees.

The areas of construction expertise we operate in include commercial, healthcare, aged care and retirement living, heritage and restoration, hi-tech research and laboratories, retail, education (tertiary, primary and secondary), community, sports & leisure, hospitality, industrial and defence.

Our supply chain is complex and extensive, comprising of subcontractors and suppliers delivering materials, equipment and services.

The vast majority of our supply chain is based on materials and operations created and run within Australia, however, we are improving our methods to identify risks to work towards even greater transparency and responsibility.

Through the modern slavery risk assessment process, Kane have identified products and/or materials originating from various countries, including France, Germany, Singapore, USA, Malaysia, Taiwan, China and Spain.

Our supply chains also include services which contribute to its operations, including cleaning and security services across Kane sites and offices.

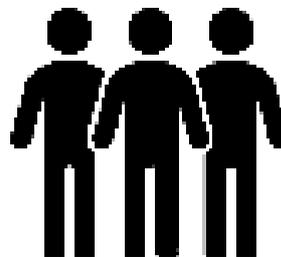
We remain vigilant to the risk of slavery and human trafficking and recognise that in certain markets the number of workers that are trafficked, exploited and forced to work in the construction and manufacturing industries continues to rise globally.



**TIER 2 COMMERCIAL
CONSTRUCTION**



**OPERATIONS ACROSS
EAST COAST**



**APPROX. 500
EMPLOYEES**



**GOVERNANCE BY
KANE BOARD**

FY 2020-2021 PRIORITIES AND ACTIONS AGAINST MODERN SLAVERY

Throughout FY20-21, Kane have continued to broaden the scope of our processes to assist in detecting and mitigating the risk of modern slavery within our supply chain. Key actions completed for the reporting period are summarised in Table 1 below.

AREA OF PRIORITY	TARGETS	REACHED	ACTIONS
POLICY & PROCESS DEVELOPMENT	MODERN SLAVERY PROCEDURE PUBLISHED	✓	Published & implemented a formal modern slavery procedure
DUE DILIGENCE	POST TENDER INTERVIEW QUESTIONS	✓	Kane modified it pre-aware process to include questions specific to modern slavery into kane's post-tender interview proforma which forms part of our sub contractor agreements with subcontractors & suppliers
	MODERN SLAVERY CLAUSES IN CONTRACTS	✓	
	CODE OF CONDUCT QUESTIONNAIRE	✓	Modern slavery specific questionnaires were issued to key subcontractors to assess modern slavery risks within their supply chains
	RIGHT TO WORK CHECK AS PART OF PTIs	✓	Kane continued to implement right to work checks for all our subcontractors prior to awarding contracts
	MODERN SLAVERY STRATEGY & REVIEW MEETINGS	✓	A mid-year review strategy meeting was conducted to assess modern slavery performance against targets
TRAINING & EDUCATION	WEBINARS & INFO SESSIONS	✓	Kane continued to meet with our key larger subcontractors to assess modern slavery risks within their supply chains
	INTERNAL STAFF TRAINING SESSIONS	✓	Kane implemented a modern slavery awareness course which will become mandatory for all our staff in FY21-22
	MODERN SLAVERY GUIDEBOOK DISTRIBUTIONS	✓	A modern slavery awareness guidebook has been implemented & issued to select employees & sub-contractors

TABLE 1 | MEASUREMENT AND EVALUATION AGAINST TARGETS

ACCESSING OUR SUPPLY CHAIN

Kane recognise that the construction industry is a high-risk sector due to large, diverse and complex supply chains. We understand the growing need to recognise potential modern slavery risks, and work towards greater transparency to eradicate human rights abuses.

To better assess our supply chain, Kane introduced modern slavery procedure within all new post-tender interview questionnaires which has allowed us to further probe and consult with our subcontractors and suppliers to understand the origins of their products, the types of materials used or purchased, and labour law compliance of both their employees and any subcontractors they use. We found that the vast majority of our supply chains are created, operated and ran within Australia, however the risk of modern slavery

may be occurring deeper within construction supply chain. I.e., materials used come from high risk areas (determined by Global Slavery Index) such as filtration equipment and light fittings sourced from China. As a result, Kane have provided information and support to our subcontractors where higher risks have been identified (see **Due Diligence** and **Training**).

COVID-19 IMPACTS

The ability to assess and address the risk of modern slavery on our subcontract and suppliers did not change during the reporting year as a result of COVID-19. New supply chains were created as a result of COVID-19 which were also assessed from a modern slavery risk.

DUE DILIGENCE

Our tender and evaluation processes for subcontractors and suppliers were updated in this reporting year and assist in recognising potential areas for modern slavery risks within our supply chain. Included in our updated processes are questions which determine whether businesses we intend to procure goods and services from have policies, standards and codes relating to modern slavery and whether they understand the risk of modern slavery in their supply chains. These responses are recorded and evaluated prior to commencing business and are embedded into our contracts.

During the reporting year, Kane also issued supplier questionnaires to select suppliers. These questionnaires provide Kane with valuable information regarding how labour and materials are sourced and provided both Kane and our suppliers with the awareness and a deeper understanding of the issues surrounding modern slavery in our industry.

We expect our supply chain to work in line with our values and comply with all legislative obligations and we do not tolerate any corrupt, illegal or other undesirable conduct. We are committed to fostering a culture where everyone feels safe to speak up on matters of concern. We have not identified any modern slavery concerns within our supply chain and will continue to work with our suppliers and subcontractors to is both assessing and educating them on the risks of modern slavery.

All records from our subcontractors are stored securely on our network and are referred to when assessing our modern slavery risks at least annually.

TRAINING

EDUCATING OUR PEOPLE

During the reporting year, Kane developed a modern slavery course. Select management and operations staff have been trained to know how to spot any signs of modern slavery throughout the supply chain. The course will be made mandatory for all staff in the next reporting year.

EDUCATING OUR SUPPLY CHAIN

Kane understand the importance of engagement with our supply chain for assessing supply chain risks. We continue to work with and assist our supply chain to implement their own modern slavery policies, procedures and systems to identify and manage their own supply chain risks. Kane will continue to conduct information sessions both with Kane staff internally and our subcontractors and suppliers in order to collectively better understand potential areas of exposure or key risks in operations.

PROMOTING AWARENESS

Kane have appointed trained employees across the business who can educate, respond to problems, and tackle worker issues or concerns. They are encouraged to raise awareness, and are empowered to drive continual improvement against modern slavery risks.

POLICIES

MODERN SLAVERY POLICY AND PROCEDURE

In the previous reporting period, Kane introduced a Modern Slavery Policy for the purpose of creating an integrated approach with organisations Kane work alongside to minimise the risks of modern slavery. To provide further information on what to do if a risk or perceived risk was ever identified, Kane have released a coinciding Modern Slavery Procedure.

Kane’s Modern Slavery Procedure addresses:

- Our commitment of conducting due diligence to ongoing assessments of our supply chain for identifying vulnerable areas;
- Modern slavery training, how to access it, and who should be involved; and
- Key personnel to contact if modern slavery risks are identified within our supply chain.

WHISTLEBLOWER POLICY

Kane’s Whistleblower Policy is available both internally and to third parties to ensure that any disclosure made about suspected misconduct or an improper state of affairs or circumstances within Kane (or its supply chain) are handled in an objective, secure and confidential manner. Kane’s Whistleblower Protections Officers are aware and have access to Kane’s Modern Slavery Procedure and how/where to escalate any modern slavery matters.

We continue to review and update our policies and procedures in accordance with legislative requirements and updates.

MODERN SLAVERY PROCEDURE

OBJECTIVE

This procedure is linked to Kane’s Modern Slavery Policy. Its purpose is to develop a uniform process across all divisions and states of Kane to effectively identify, measure, and collaborate on modern slavery reporting in accordance with our legislative obligations.

LEGISLATIVE REPORTING REQUIREMENTS

In accordance with the Modern Slavery Act 2018 (Cth) Kane are required to submit an annual Modern Slavery Statement within six months after the end of our financial year. (June 30th) The Statement requires board approval and outlines the risk of Modern Slavery in our operations and supply chains, the actions taken to address those risks and the effectiveness of our responses. Once submitted, these statements will be kept by the Minister for Home Affairs in a central registrar and may be accessible by the public.

PROCEDURE

Modern Slavery Statement and Policy Review– Kane will review its modern slavery statement and policy annually. We will set annual targets in line with best practices and benchmark progress to get a better understanding of the modern slavery risks that are inherent within our business or supply chain. We will endeavour to investigate risks and develop initiatives with the purpose of driving forward change and continual improvement within our business.

Due Diligence – We will continually assess which parts of our subcontract/ supply chain are most vulnerable. To assist in identifying key risks within our business Kane will endeavour to:

1. Implement Tender evaluation processes for subcontractors and suppliers and ensure all policies, standards and codes as it relates to Modern Slavery are cascaded through our supply chain and embedded in contracts.
2. We will conduct selected supplier questionnaires. We will ask selected subcontractors and suppliers to provide of copy of their Modern Slavery statement and conduct audits on those that fall into high-risk categories. We will enquire into their operations, how they source labour and materials, the prices they pay to their suppliers further down the supply chain, etc. in order to build awareness and a deeper understanding of the issues surrounding modern slavery in our industry and combat the risk of modern slavery

Training and Education – We will appoint Champions or mentors across the business who can educate, respond to problems, and tackle worker issues or concerns. We will encourage them to raise awareness, and empower them to drive continual improvement. Kane will endeavour to:

1. Train our staff to spot the signs of modern slavery inside the company and throughout the supply chain. Training will focus on red flags to look out for and what to do if foul play is suspected. All Kane employees have access to an online course on modern slavery <https://kaneconstructions.myo1.com/play/32005706>
2. Conduct webinars and information sessions both with Kane staff internally and our subcontractors and suppliers in order to collectively better understand potential areas of exposure or key risks in operations.

LOOKING FORWARD

AREA OF PRIORITY	ACTIONS
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POLICY & PROCEDURE DEVELOPMENT	<ul style="list-style-type: none">■ Review of our Modern Slavery Policy■ Introduction of Code of Conduct
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DUE DILIGENCE	<ul style="list-style-type: none">■ Access questionnaire process for improved risk assessment methodology■ Modern Slavery specific Post-Tender Interview Questions■ Modern Slavery Clauses in Contracts■ Code of Conduct Questionnaire■ Subcontractor and Supplier Right to Work Checks■ Modern Slavery Strategy and Review Meetings
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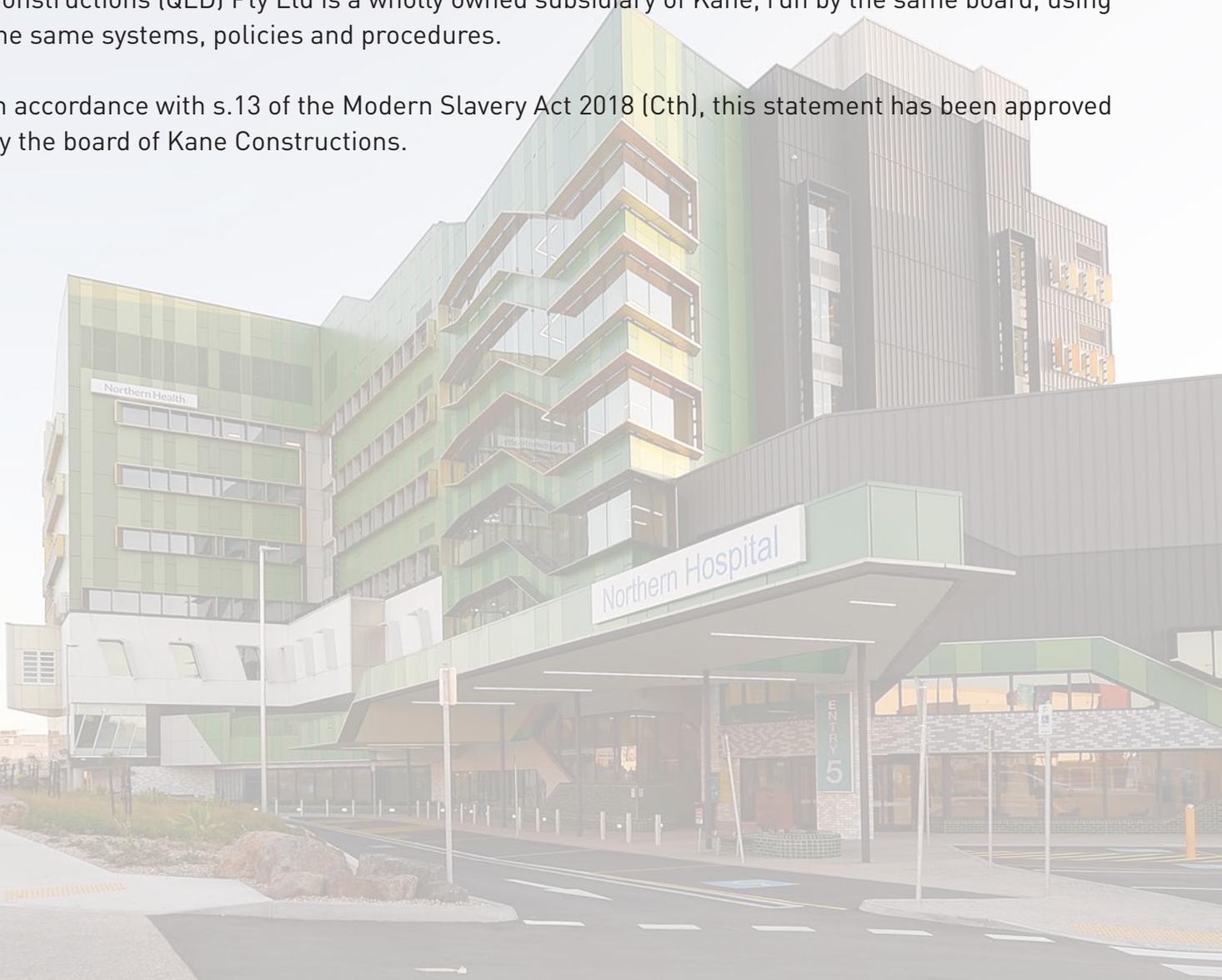
TRAINING & EDUCATION	<ul style="list-style-type: none">■ Internal and external training sessions■ Modern Slavery Guidebook Distribution
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APPROVAL

The actions and taken to assess and address risks across “Kane” cover both Kane Constructions Pty Ltd (ABN 49 007 354 396) and Kane Constructions (QLD) Pty Ltd. (ABN 84 625 262 633). Kane Constructions (QLD) Pty Ltd is a wholly owned subsidiary of Kane, run by the same board, using the same systems, policies and procedures.

In accordance with s.13 of the Modern Slavery Act 2018 (Cth), this statement has been approved by the board of Kane Constructions.



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JOINT MANAGING DIRECTOR

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