

MODERN SLAVERY STATEMENT 2023

HUON.NET.AU

Purpose & Scope

Huon Contractors recognises that Modern Slavery is a global issue and that it affects vulnerable individuals and communities around the world. We are committed to ensuring there is no Modern Slavery or human trafficking in our business or supply chains as well as maintaining transparency through the procurement of goods and services consistent with the obligations under the Modern Slavery Act 2018 (“Act”).

Our Business

Huon is a civil engineering construction business specialising in road, rail, bridge, and subdivision works in the ACT and NSW. We deliver infrastructure projects to government and private sector clients. Huon is a solutions-orientated company and strives for excellence in its staff and customer relationships.

Huon is 100% Australian owned and operated and employs approximately 90 permanent employees.

Whilst Huon’s supply chain includes the procurement of typical goods and services required to operate and administer a business, Huon’s supply chain spend is dominated by the contracted supply of construction related materials, plant and equipment, and services.

The aforementioned materials, plant, equipment and services originate from both Australia and overseas.

Our Objectives

Guided by its values, the objective of this Modern Slavery Statement is to ensure Huon Contractors develops and conducts all business activities in an ethical manner through the following objectives.

- Provide training to all employees on recognising modern slavery in the workplace and within our supply chains.
- Enforce a zero-tolerance to modern slavery in the workplace.
- Implement and enforce effective systems and controls to ensure modern slavery does not occur anywhere in our business or supply chains.
- Provide a framework to ensure we are acting ethically and with integrity in all business dealings and relationships in accordance with our policies.
- Encourage Whistleblowing in so far as all employees are to report wrongdoing, illegal or unethical practices in regard to modern slavery in any parts of the business or supply chains of any supplier, at the earliest possible stage.
- Review & monitor through internal auditing processors.

Huon’s vision is that the collective actions taken as outlined in this MSS will progressively reduce the risk of modern slavery within its supply chain.

Modern Slavery Risks

The Risk of Directly Causing Modern Slavery

Huon operates solely within Australia. As Huon’s labour engagement and management policies and practices are structured strictly in accordance with the relevant laws, the risk of Huon directly causing modern slavery is considered low.

The Risk of Contributing to Modern Slavery

Huon understands that its businesses are at risk of contributing to modern slavery through its operations and/or actions in its supply chains. This includes acts or omissions that may facilitate or incentivise modern slavery through commercial pressures. As Huon’s procurement practices are governed by a layered approval process, this risk is considered to be an unlikely occurrence. The pre-qualifications and awareness raising actions described below will further reduce this risk.

Direct Link to Modern Slavery

Huon acknowledges that it is at risk of being connected to modern slavery through the activities of other entities that we have business relationships with, namely our suppliers and contractors. Further, supply chain partners of our direct suppliers and contractors also present risk. Given the diversity and depth of parts of our supply chain, it is links of this nature that are considered Huon’s most significant risk of exposure to modern slavery.

In particular, the risks of modern slavery are most likely to arise from:

1. Materials sourced from overseas regions at risk of modern slavery; and
2. Local trades where unskilled or semi-skilled labour is sourced.

Given the above, Huon’s actions will prioritise assessing and addressing these risks.

Due Diligence and Remediation.

Huon has implemented initiatives to assess and address the risks of modern slavery, including due diligence and remediation. These initiatives can be summarised by the following actions which are to be integrated into Huon’s operating framework:

- A Supplier Code of Conduct which sets out Huon’s expectations of its supply chain, including in respect of modern slavery.
- A Sustainable Procurement Policy which outlines Huon’s commitment to socially responsible procurement including a commitment to work towards eliminating modern slavery from its supply chain.
- A modern slavery risk assessment carried out for key tenders.
- A training program for staff raising awareness of the risks of modern slavery both in our supply chain and on construction sites.

Consultation with Entities

Huon acknowledges that all the entities have an equal role to play in understanding, identifying, and reporting any known incidents of Modern Slavery.

The process of consultation involves discussions with Directors and Managers of our operating entities to inform them of Huon’s obligations under the Modern Slavery Act and to gather their input on our collective approach to addressing this social governance issue.

Huon will continue to engage its stakeholder groups to seek opportunities for improved awareness, due diligence, and cooperation amongst all parties.

Reporting and Measuring Effectiveness.

Huon's response to modern slavery is incorporated into its operating framework, facilitating the following opportunities to report and measure effectiveness:

- Huon's Internal Audit program measures compliance with our operating framework.
- The record keeping required by the framework will enable analysis of effectiveness year on year, including in instances where specific modern slavery risks are identified.
- Supplier Surveys from our supply chain partners are required to be updated biennially, enabling Huon to track increased comprehensiveness of responses and improved engagement practices within supply chains.

Huon's engagement with suppliers through its Supplier Surveys and the discussions and actions that follow will foster an increased awareness of modern slavery and the expectations around it, particularly in respect of suppliers whose programs are still in early stages of implementation.

Responsibility for this statement

The prevention, detection, and reporting of modern slavery in any part of the business or supply chains is the responsibility of all those working for Huon Contractors or under its control, including all employees, subcontractors, and suppliers. Every person engaged or caused to be engaged has the responsibility to avoid any activity that might lead to or suggest a breach of this statement.

Anisha Sachdeva-Marar (Director) has approved this Modern Slavery Statement and has overall responsibility for ensuring that it complies with legal and ethical obligations, and that all those engaged under Huon Contractors control comply with it.

Management at all levels are responsible for ensuring those reporting to them are aware of and understand and comply with this and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Approval of this Modern Slavery Statement

This statement has the approval of the Statutory Board.



Anisha Sachdeva-Marar

DIRECTOR

12/12/2023