



**VAUGHAN**  
CONSTRUCTIONS  
SINCE 1953

# MODERN SLAVERY STATEMENT FY20

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# SECTION 1 - IDENTIFICATION



Vaughan Constructions Pty Ltd (Vaughan) is a privately-owned Design and Construction business specialising in industrial construction and operating solely within Australia. At Vaughan Constructions, we have a target to minimise the potential for modern slavery and are fully committed to preventing all types of modern slavery, that being; all forms of human trafficking, slavery and slavery practices , as well as child labour in its worst forms, throughout our operation, subcontractors, and supply chains.

## SECTION 2 - ORGANISATIONAL STRUCTURE

Vaughan Constructions Pty Ltd is a private company that operates nationwide within Australia.

Vaughan has three offices:

Head Office (registered office):

880 Lorimer Street, Port Melbourne, VIC 3207

NSW Office

9A Commercial Street, Kingsgrove, NSW, 2208

QLD Office

60A Gloucester Street, Spring Hill, QLD, 4000

Vaughan Constructions Pty Ltd ABN is 26 004 334 543. A Copy of Vaughan Constructions ABN registration is attached as appendix 1.

This report is made in conjunction with and on behalf of Vaughan Constructions subsidiary: Vaughan Constructions (QLD) Pty Ltd, ABN 84 661 381 055. ABN registration is attached as appendix 2. Note this subsidiary was not active during FY20.

## SECTION 3 - OPERATIONAL STRUCTURE

Vaughan Constructions consists of:

- Board of Directors - three non-executive Directors; Matthew Vaughan, Kenelm Vaughan and Chairman Richard Garvey, as well as three executive Directors; Managing Director Andrew Noble, Eric (Hock Ching) Law and Mark Byrne.
- During the reporting period Vaughan employed 125 staff members, 108 employees were based in VIC, 13 in NSW, and 4 in QLD.

A copy of Vaughan Constructions Organisational Chart has been attached as appendix 3.

Vaughan Constructions business is heavily reliant on the use of suppliers and subcontractors. A map of corporate, operational and direct procurement is attached as appendix 4.

## SECTION 4 - SUPPLY CHAINS

At Vaughan, we aim to establish a relationship of trust and integrity with all our suppliers and subcontractors, which is built upon mutually beneficial factors.

Our Supplier selection process includes:

- Compliance with government mandated standards.
- Compliance with health, safety and environmental standards.

Our subcontractor selection process includes:

- Compliance with government mandated standards.
- Compliance with health and safety requirements.
- Compliance with environmental requirements.
- Minimum of three industry references.

All supplier and subcontractor selection includes due diligence of the supplier's reputation and respect for the law. Vaughan take into consideration; geographical location of suppliers, original supply location, and the type of goods and services.

# SECTION 5 - RISK ASSESSMENT



Vaughan have identified those suppliers and subcontractors at the highest risk of modern slavery through a four-factor risk assessment; vulnerable populations, high risk categories, high risk business models and high-risk geographies. This risk assessment has been attached as appendix 5.

Based on the businesses identified as high risk through the four-factor risk assessment, Vaughan have:

- Included the identified risk categories, risks, consequences, initial risk rating, control and revised risk rating into the Vaughan Constructions Risk register. An exert from this register is provided as appendix 6.

# SECTION 6 - RISK MANAGEMENT

## Policies:

Vaughan Constructions operates the following policies for identifying and preventing modern slavery within our operations:

- Whistleblowing Policy – attached as appendix 7.
- Code of Conduct – attached as appendix 8.
- Supplier Code of Conduct – attached as appendix 9.

All policies are available for review on Vaughan Constructions intranet. All employees are required to undertake training on; VC business ethics and VC code of conduct, with an assessment required to show sufficient knowledge and understanding of these policies. Vaughan Management and Board of Directors are required to undertake training on the Modern Slavery act and show sufficient knowledge and understanding via an assessment.

## Supplier and Subcontractor Management:

Vaughan Constructions conducts due diligence on all suppliers and subcontractors via both the induction process and continued audits of existing suppliers and subcontractors. This includes:

- Auditing supplier and subcontractor OH&S standards.
- Auditing supplier and subcontractor labour relations and awards.
- Requiring improvements to any substandard employment of health and safety practices.
- Sanctioning suppliers and subcontractors who fail to improve on performance in line with Vaughans requirements. Vaughan have since created a Modern Slavery Identification and Remediation process. A copy of this process has been attached as appendix 10.

In order to increase Vaughans supplier and subcontractor due diligence we have updated our subcontract to include the following requirements:

- They do not use any form of forced, compulsory or slave labour.
- Their employees work voluntarily and are entitled to leave work.
- They provide each employee with an employment contract that adheres to the relevant employment act or National Employment Standard (NES).
- They agree to participate in surveys or questionnaires, from time to time when requested to do so by Vaughan, on supply chains and supply chain processes.

## **SECTION 7 - RISK REVIEW**



As a Federal Safety Commission (FSC) accredited organisation our teams are continually reviewing and auditing our internal operations as well as our supplier and subcontractor networks.

Vaughan Constructions commits to review the risk assessment framework as set out in this document annually, in line with the reporting period.

## **SECTION 8 - SUBSIDIARIES**

Vaughan Constructions Pty Ltd submits this report to the Home Office in conjunction with its subsidiary Vaughan Constructions (Qld) Pty Ltd. Note this subsidiary was not active during FY20.

# SECTION 9 - RESPONSIBILITIES OF VAUGHAN CONSTRUCTIONS

Our organisation supports the fight against modern slavery. In order to ensure that we take a robust stance and comply with legislation, Vaughan:

- Has appointed a team to annually review the compliance of the modern slavery provisions. This team consists of Vaughan Constructions; Managing Director, Human Resources Manager, CFO, National Design Manager and Senior Construction Manager.
- Is developing a Modern Slavery e-learning module for all Vaughan Constructions employees to cover; forms of modern slavery, how to identify and how/when to report and respond.
- Conducts regular supplier and subcontractor audits as referred to in section 6 Risk Management to ensure that they comply with the Act.
- Has designed a due diligence framework to identify risks in the supply chain and provide a process for managing suppliers who may partake in modern slavery practices.
- Implemented robust policies and procedures relating to modern slavery.
- Ensures our current and future supply contracts contain provisions against modern slavery.
- Is Providing the Minister of Home Affairs with our annual Modern Slavery Statement covering our reporting period within six months of that period ending.
- Is developing a targeted ethics survey for suppliers and subcontractors to further review of compliance with the Modern Slavery Act.

# SECTION 10 - APPROVAL



This statement covers 31st July 2019 to 31st June 2020 and has been approved by Vaughan Constructions Board of Directors at the Board meeting held on 7th December 2020.

Andrew Noble

Managing Director

07.12.2020

# APPENDIX 1 - VAUGHAN CONSTRUCTIONS ABN



Australian Government  
Australian Business Register

## ABN Lookup

### Current details for ABN 26 004 334 543

#### ABN details

Entity name:	VAUGHAN CONSTRUCTIONS PTY. LTD.
ABN status:	Active from 25 Feb 2000
Entity type:	<a href="#">Australian Private Company</a>
Goods & Services Tax (GST):	Registered from 01 Jul 2000
Main business location:	VIC 3207

#### Trading name(s)

From 1 November 2023, ABN Lookup will not display trading names and will only display registered business names. For more information, click [help](#)

Trading name	From
VAUGHAN CONSTRUCTIONS PTY LTD	25 Feb 2000

#### ASIC registration - ACN or ARBN

004 334 543 [View record on the ASIC website](#)

#### Deductible gift recipient status

Not entitled to receive tax deductible gifts

# APPENDIX 2 - VAUGHAN CONSTRUCTIONS (QLD) ABN



Australian Government  
Australian Business Register

## ABN Lookup

### Current details for ABN 81 644 381 055

#### ABN details

Entity name:	VAUGHAN CONSTRUCTIONS (QLD) PTY LTD
ABN status:	Active from 16 Sep 2020
Entity type:	<a href="#">Australian Private Company</a>
Goods & Services Tax (GST):	Not currently registered for GST
Main business location:	VIC 3207

#### ASIC registration - ACN or ARBN

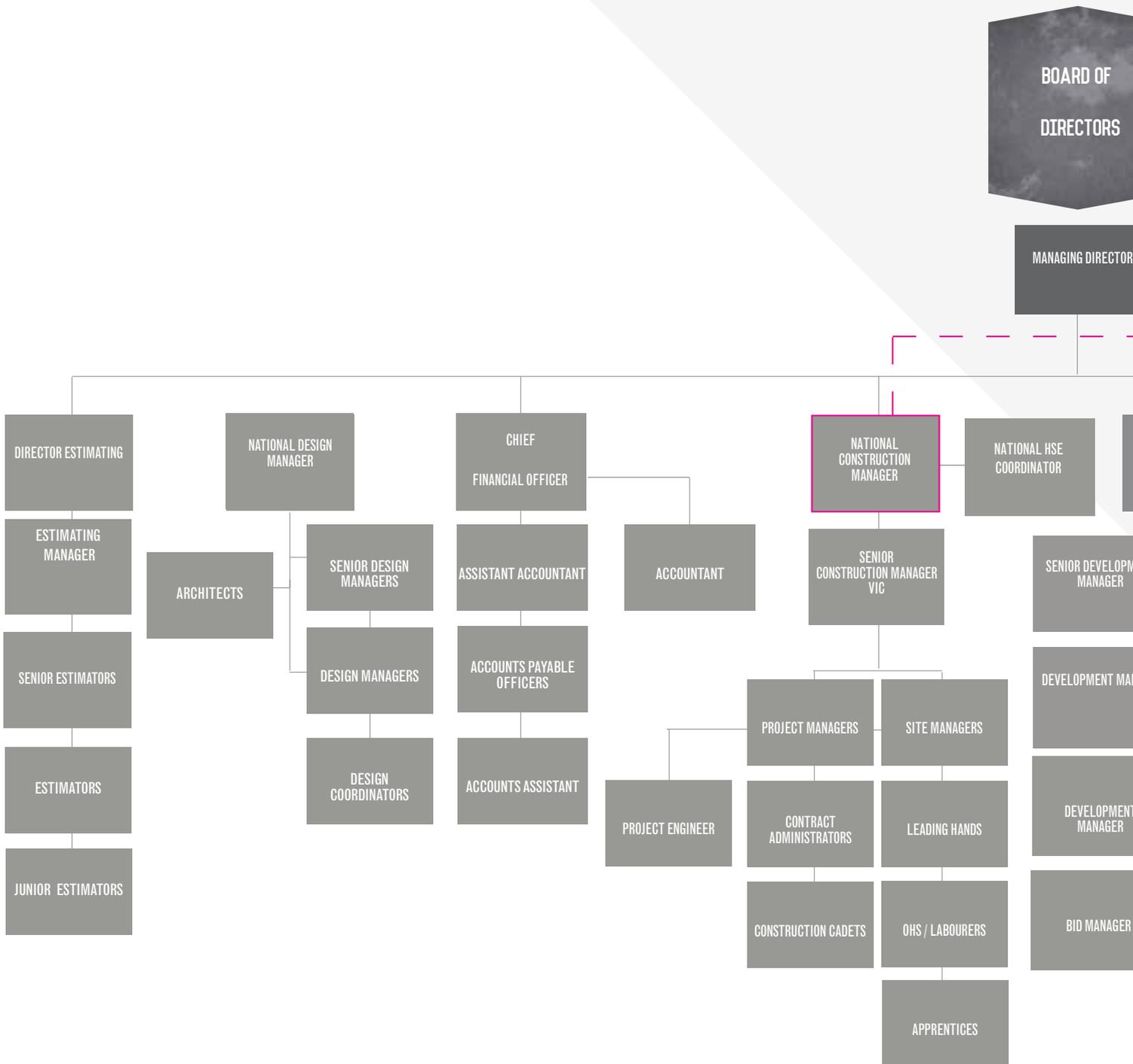
644 381 055 [View record on the ASIC website](#)

#### Deductible gift recipient status

Not entitled to receive tax deductible gifts

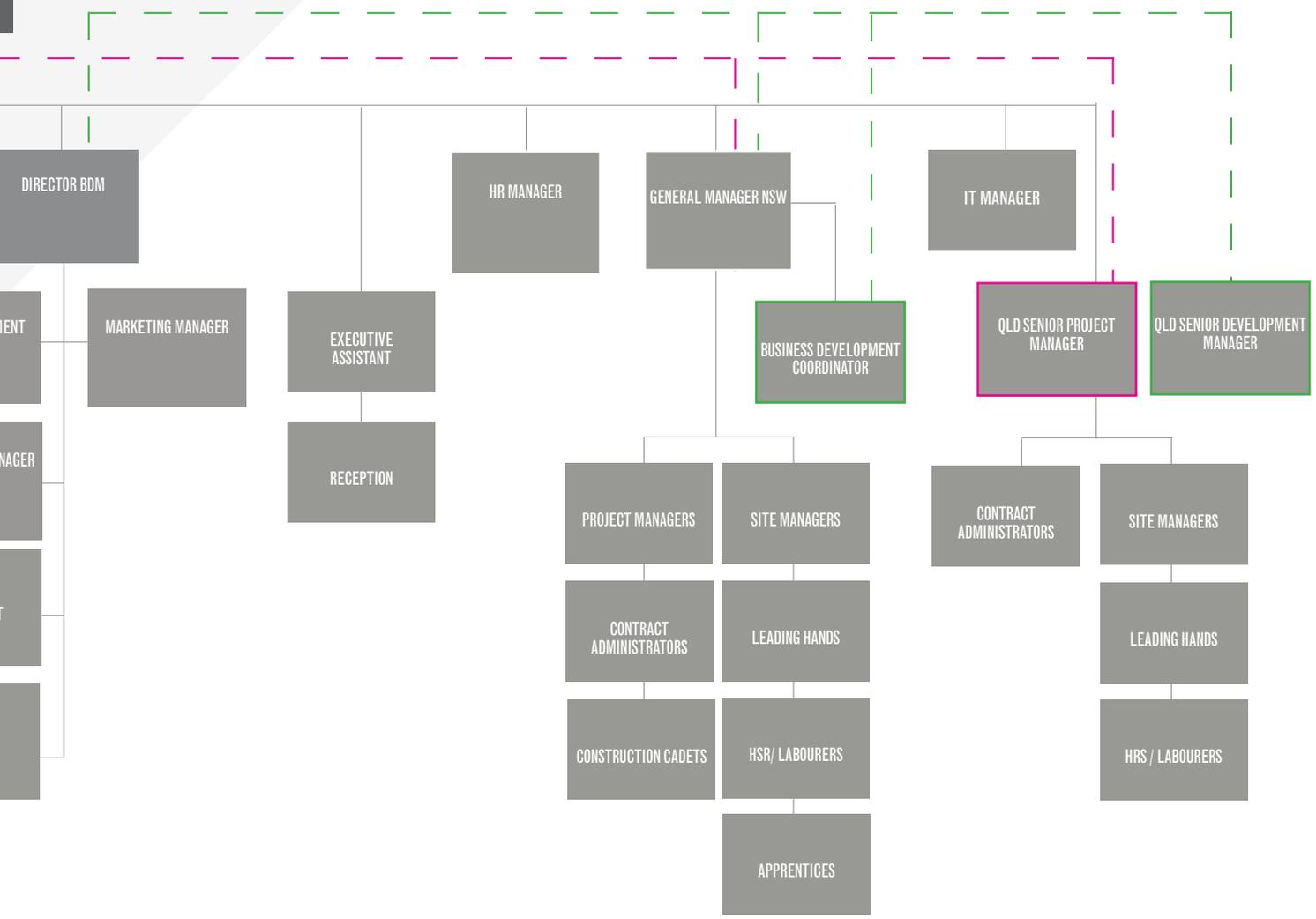
# APPENDIX 3 - ORGANISATIONAL CHART

## VAUGHAN CONS ORGANISATION



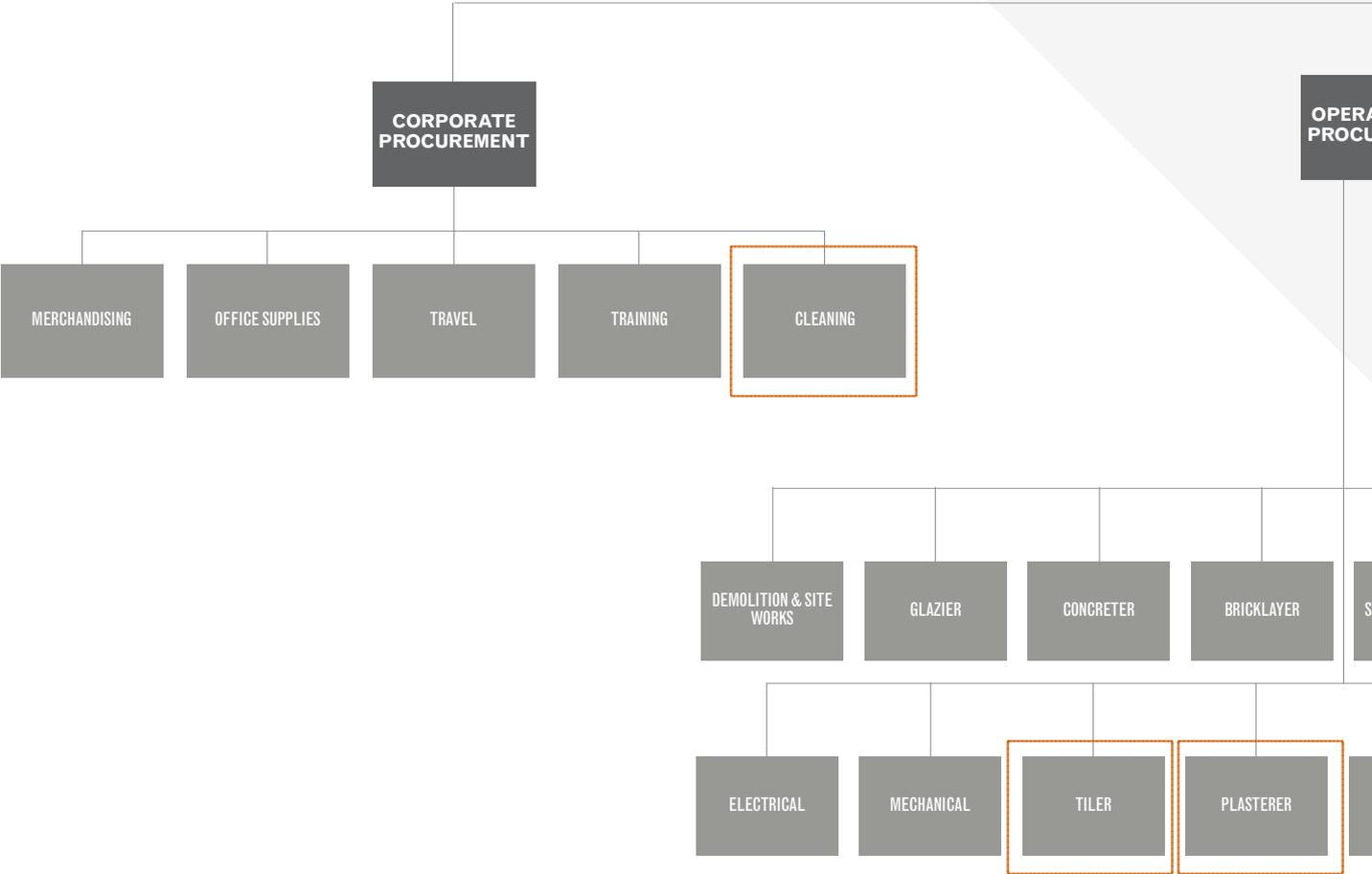
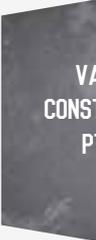


# CONSTRUCTIONS ORGANISATIONAL CHART



# APPENDIX 4 - SUPPLIER MAPPING

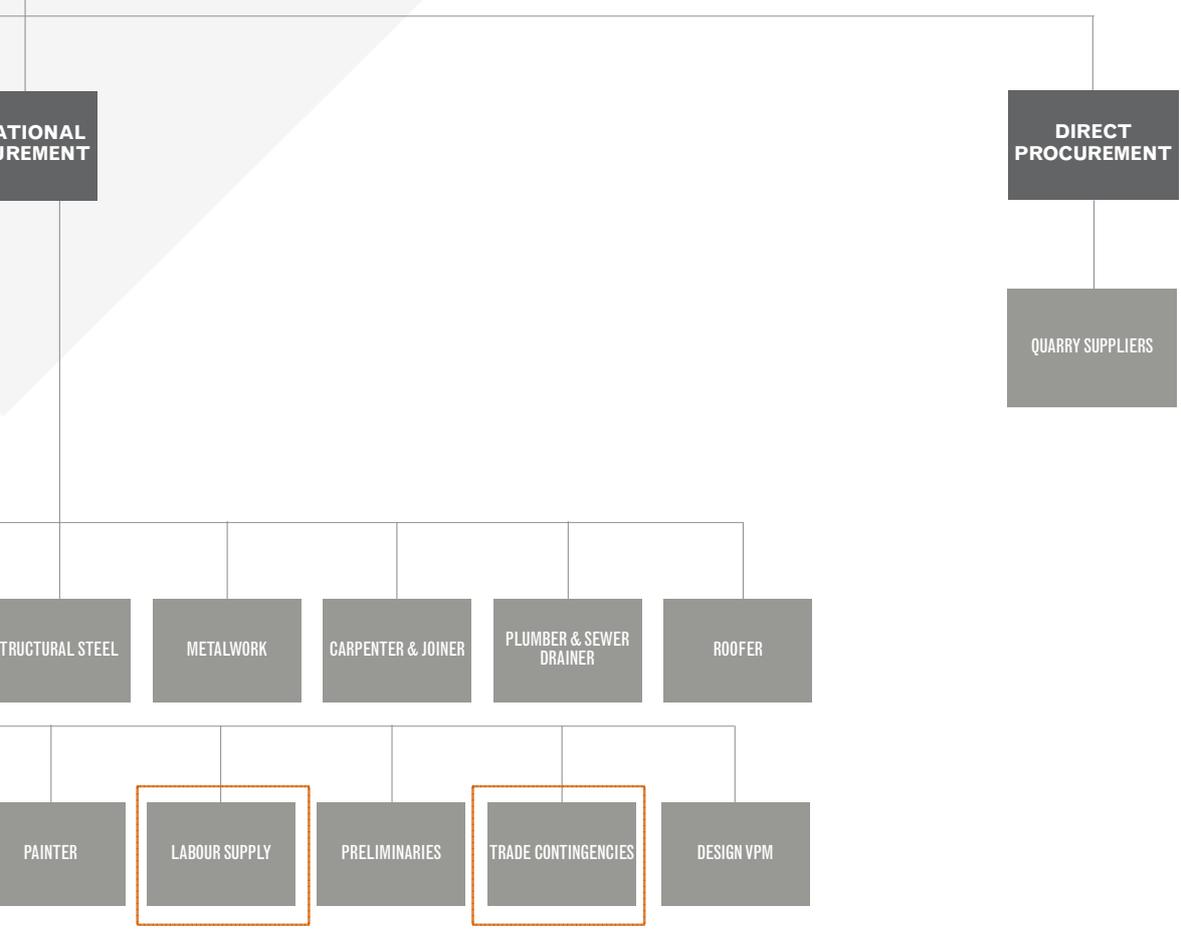
## VAUGHAN CO SUPPLIER





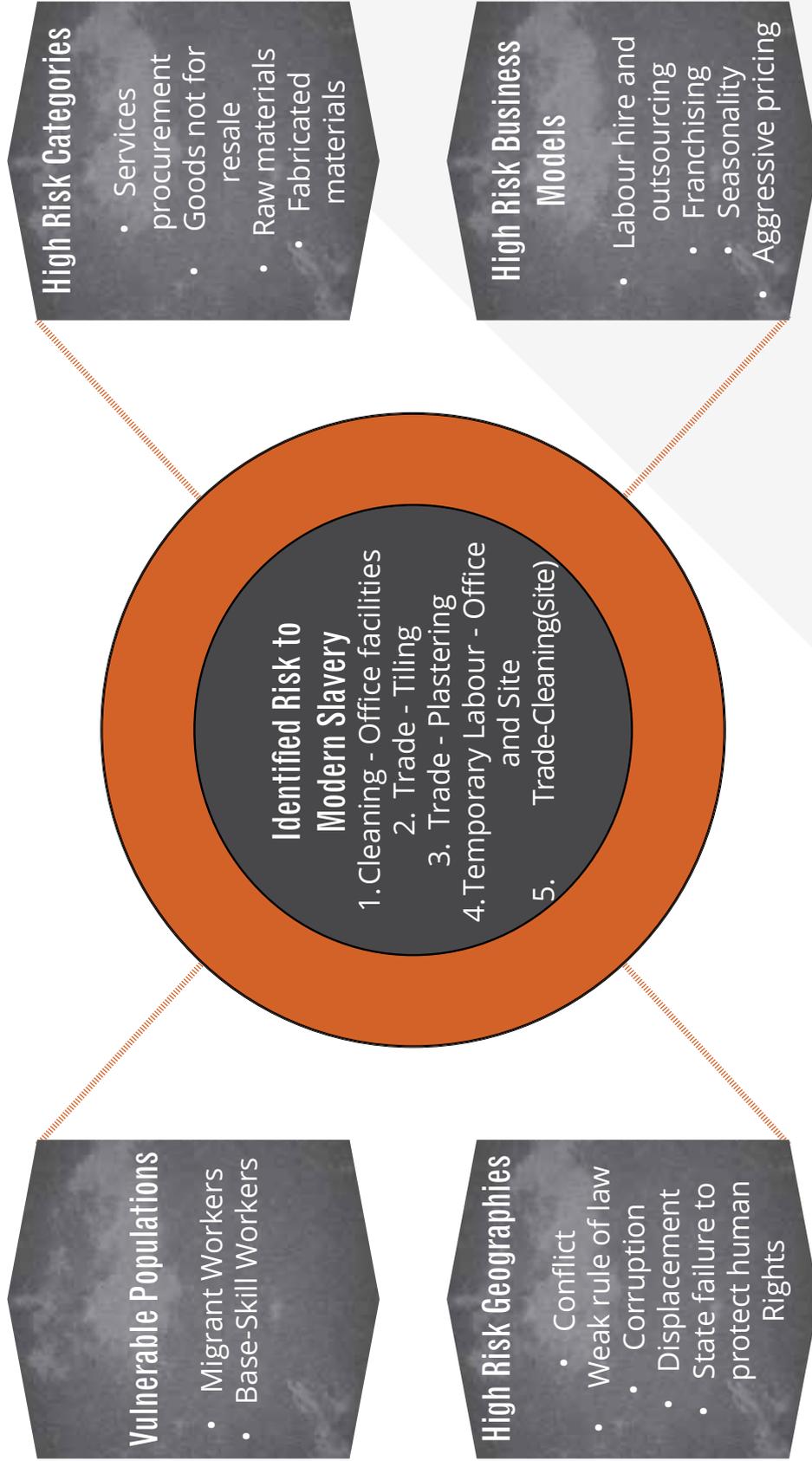
# CONSTRUCTIONS R MAPPING

LAUGHAN  
CONSTRUCTIONS  
TY LTD



 = Identified risk category

# APPENDIX 5 - FOUR FACTOR RISK ASSESSMENT



# APPENDIX 6 - RISK REGISTER



Vaughan Constructions - Risk Register								Issue 2, Nov 2020
Department	Category	Item	Risk	Consequences	Risk Rating	Control	Control Reference	Revised Risk Rating
All	Governance	Modern Slavery	Cleaning contractors - potential use of vulnerable populations and high risk business models	Reputational loss, potential financial loss, Client and community relationship damage.	Medium	Update to subcontract. Inclusion of Supplier Code of Conduct. Increased auditing of OH&S standards and labour relations and awards.	Board planner	Low
All	Governance	Modern Slavery	Tiling trades - potential use of vulnerable populations and high risk business models	Reputational loss, potential financial loss, Client and community relationship damage.	Medium	Update to subcontract. Inclusion of Supplier Code of Conduct. Increased auditing of OH&S standards and labour relations and awards.	Board planner	Low
All	Governance	Modern Slavery	Plastering trades - potential use of vulnerable populations and high risk business models	Reputational loss, potential financial loss, Client and community relationship damage.	Medium	Update to subcontract. Inclusion of Supplier Code of Conduct. Increased auditing of OH&S standards and labour relations and awards.	Board planner	Low
All	Governance	Modern Slavery	Temporary Labour - potential risk of vulnerable populations and high risk business models	Reputational loss, potential financial loss, Client and community relationship damage.	Medium	Update to subcontract. Inclusion of Supplier Code of Conduct. Increased auditing of OH&S standards and labour relations and awards.	Board planner	Low
All	Governance	Modern Slavery	On site cleaning trades - potential use of vulnerable populations and high risk business models	Reputational loss, potential financial loss, Client and community relationship damage.	Medium	Update to subcontract. Inclusion of Supplier Code of Conduct. Increased auditing of OH&S standards and labour relations and awards.	Board planner	Low

# APPENDIX 7 - WHISTLEBLOWER POLICY

## Whistleblower Policy – December 2020

Integrity is at the heart of Vaughan Constructions (Vaughan) Values (Our RITES.) It is our aim to conduct ourselves with the highest of integrity in everything we do including the way we deal with our sub-contractors, our suppliers, our clients and each other.

Significant consequences may occur if we don't meet an approximately high standard of integrity and having a transparent and clear whistleblower policy is essential to both good risk management and maintaining high standards of corporate governance.

This policy applies to all, current and former, Vaughan employees including directors, officers, full time, part-time, or casual employees, cadets, contractors, contingent workers and consultants globally, as well as others with a connection to the Vaughan group such as associates, suppliers or service providers and their employees, or a relative or dependant or the spouse of any of these individuals.

### Purpose and Protection

Vaughan's Whistleblower Policy is our defence against corporate fraud and wrongdoing. Vaughan encourages our staff and external parties to speak up in confidence if they suspect someone's actions or Vaughan processes are exposing Vaughan to risk - whether that is reputational, ethical, legal or regulatory.

There are several ways in which staff can raise concerns which are set out further below. You may prefer to raise the issue on an anonymous basis, or may be comfortable raising it on a named but confidential basis.

When considering how and on what you want to raise the concern, consider carefully the level of detail Vaughan needs to fully investigate the issue and whether you wish to be informed of any remedial steps taken.

Provided you raise a genuine concern under this Policy and have reasonable grounds to suspect misconduct or an improper state of affairs, you will not suffer any detriment regardless of whether or not your concern is proved to be well-founded following the investigation. If any individual is harassed or otherwise victimised after raising a concern, Vaughan will take the appropriate actions.

Please also note that the Corporations Act provides important legal protection for eligible whistleblowers.

### Reportable conduct or concerns under this policy

The types of issues that can be raised under this policy are in respect to:

- money laundering
- fraud, bribery or corruption
- breaches of our legal and regulatory obligations
- irregularities involving financial or accounting procedures
- any criminal offence, including theft of proprietary information or property



- conduct which is or may be in conflict with the Company's interests such as involvement with a competitor
- dishonesty or other irregularities in dealing with customers, vendors and other business partners
- illegal payments to government officials or companies
- conduct which endangers the health and safety of employees and others working for Vaughan
- conduct that represents a danger to the public
- Modern Slavery
- soliciting and/or receiving gifts, services or benefits from external parties in excess of \$100 that have not been declared
- providing advantage, or disadvantage as the case may be, in the awarding of consultant, sub contract or supply agreements, or variations to the same, to procure personal gifts, service or benefits from external parties
- conduct that is considered to be a deliberate act that is not for the benefit of the company eg: active absenteeism including falsifying Medical or Annual Leave forms, deliberate non compliance with reasonable instructions from authorised officers or the like

This list is not exhaustive. If you are not certain whether something is unethical, you are encouraged to raise in any event.

Please note that personal work-related grievances do not generally qualify as whistleblower events.

### **Whistleblower - options for raising an issue**

This Policy envisages a number of ways in which you can report a misconduct or concern:

1. Human Resources – where you feel comfortable raising concerns directly, please be assured that you can raise issues on a confidential basis with Human Resources department manager
3. **Senior management** – you may also raise a concern with a member of senior management, such as a director or a senior manager, who will escalate the issue as appropriate.
4. **Local Regulator or relevant body** – you can raise concerns direct with the relevant external regulatory authority where you feel that none of the above options will sufficiently address your concern.

What happens when you raise a whistleblowing event?

1. We will investigate
2. We will keep you informed
3. We will report our findings to you (to the extent permitted by law)
4. The Board of Directors will monitor the handling of all whistleblower complaints.

### **Confidentiality and Zero Tolerance for retaliation**

Those who raise a genuine concern under the Whistleblower Policy are not at risk of losing their job or suffering any form of retaliation as a result, if they are genuinely mistaken.

Vaughan will not tolerate the harassment or victimisation of anyone who makes a disclosure where they have reasonable grounds to suspect misconduct or an improper state of affairs.

We recognise that employees or external parties may want to raise a concern anonymously or in confidence. We will protect their identity and will not disclose it without their consent, unless allowed or required by law.

## **Your experience**

This Policy is to encourage and enable staff and external parties to speak up. From time to time, Vaughan may request feedback on your experience to ensure it is achieving its aim of creating a culture of openness, transparency and positive recognition of individuals who raise genuine concerns.

## **Global applicability**

Whilst this policy and the standards contained herein are global, as appropriate, local law will apply to the handling of any particular case.

This policy will be available to all personnel and external stakeholders via our intranet and external website.



# APPENDIX 8 - CODE OF CONDUCT

## Code of Conduct

Vaughan Constructions expects that its employees will always display high standards of professional and personal conduct, serving the needs of customers, subcontractors, and stakeholders at all times.

## Obligations

All Vaughan employees have an obligation and duty of care to:

- Act in the best interest of Vaughan Constructions at all times, representing the company values of; Respect, Integrity, Teamwork, Efficiency and Safety (RITES).
- Comply with community standards of; equity, justice, fairness, and compassion in dealing with others.
- Perform duties in a responsible and professional manner, compliant to company policies and other legal requirements and obligations.
- Take care of company resources and property.
- Promote and protect the company's reputation in the wider community.
- Act appropriately when a conflict arises.

## Behaviour

### Personal Conduct

All employees are expected to:

- Treat everyone with courtesy, respect, kindness, consideration, and sensitivity to their rights.
- Refrain from all forms of harassment and discrimination based on gender, race, religious belief, political affiliation, pregnancy, disability, sexual orientation or illness.
- Always act honestly, in good faith, and respectful.
- Respect each individual's rights to privacy and keep personal information in confidence.
- Consider the impact of their decisions and behaviour on the well-being of others.
- Refrain from allowing personal relationships to affect professional relationships.

- Seek advice from an appropriate manager where a colleague's behaviour is perceived to be in breach of the Code, and report any suspected corrupt, criminal or unethical conduct to HR Manager or the Managing Director.

### Professional Conduct

All employees are expected to:

- Perform duties diligently, impartially, conscientiously, with integrity, and to the best of our ability.
- Take ownership for the health and safety of themselves and others when carrying out duties.
- Strive to always achieve high professional standards.
- Comply with all relevant legislative, industrial and administrative requirements.
- Comply with the principles of environmental responsibility.
- Foster teamwork amongst all employees.
- Maintain adequate documentation to support any decisions made.
- Take no improper advantage of any official information gained in the course of employment.
- Refrain from allowing personal political views and/or affiliations or other personal interests to influence the performance of duties or exercise of responsibilities.

### Stewardship of company resources

All employees are expected to:

- Use company technical and physical resources properly, responsibly and for legitimate purposes only.
- Seek permission before using company property for personal purposes.
- Use resources in a manner that causes no harm to the community or environment.
- Strive to always obtain value for company money spent and avoid waste and extravagance in the use of company resources.
- Secure all company property against theft or fraud.
- Maintain the integrity and security of all company intellectual property.



- Maintain the security, integrity and confidentiality of all relevant company commercial and other information.
- Adhere to the company IT Policy.

#### Protection and promotion of the company's reputation

All employees are expected to:

- Promote the company wherever possible in professional dealings with others.
- Refrain from engaging in any activity that may compromise the company's integrity and reputation

#### Dealing with conflicts of interest

All employees are expected to:

- Ensure that any financial, other interests and actions do not conflict, or seem to conflict, with the obligations and requirements of Vaughan Constructions – or advance their own interests over those of the company.
- Avoid any financial, other interest or undertaking that could directly or indirectly, compromise the performance of duties.
- Take all suitable measures to avoid, or deal appropriately with, any situation in which Vaughan Constructions may have, or be seen to have, a conflict arising out of relationships with others within or beyond the company.
- Notify your manager, a Director, or the HR manager, as appropriate, of the existence of an actual, or potential, conflict of interest

#### Compliance and breaches

All company employees must comply with this Code of Conduct and report any breaches to their manager, a Director, or the HR manager, as appropriate.

Employees whose conduct falls below the standards outlined in the Code may be counselled accordingly and/or disciplined in accordance with their employment contract.

# APPENDIX 9 - SUPPLIER CODE OF CONDUCT

## Supplier Code of Conduct

This Supplier and subcontractor Code of Conduct sets out the minimum standards that Vaughan Constructions and its subsidiary Vaughan Constructions (QLD), expect of their suppliers and subcontractors.

Vaughan expects its suppliers to comply with social, environmental and ethical standards of behaviour, comply with legislation and meet the required standards of the International Labour Organisation (ILO) and the Australian Human Rights Commission.

## Application

This Code of Conduct applies to all entities that supply goods or services to Vaughan Constructions. Vaughan expects all of its Suppliers to ensure;

- a) that they comply with the Code;
- b) that their own supply chain complies with the Code; and
- c) that suitable management systems and processes are implemented to ensure and measure compliance with the Code.

We expect our suppliers to communicate this Code to their related entities, employees, suppliers and subcontractors so that they are aware of, understand and comply with this Code.

## Compliance with Law

Suppliers must comply with all local, national and other applicable laws and regulations of the jurisdictions in which they operate. The standards outlined in this Code do not replace or alter any legal or regulatory obligations of Suppliers.

## Labour and Human Rights

At Vaughan, we respect our people, clients and stakeholders. Vaughan Constructions is built on the company values of; Respect, Integrity, Teamwork, Efficiency and Safety. We expect our Suppliers to align with these principles.

In particular we expect our suppliers to:

- Human rights: Conduct their activities in a manner that respects human rights;



- Wages: Comply with applicable laws and regulations relating to remuneration and benefits, including minimum wages, overtime, superannuation, leave entitlements and other benefits, and ensure the timely payment of workers. Pay their workers equal pay for equal work;
- No forced labour: Not engage in or tolerate the use of forced, bonded, compulsory labour, slavery or human trafficking, the use or threat of physical or other punishment, or the physical, sexual or psychological abuse or inhumane treatment of workers;
- No child labour: Comply with international and local obligations relating to the employment of children, including adhering to the minimum legal working age in their jurisdiction or the standards set by the International Labour Organisation, whichever is higher. Ensure children under the age of 18 are not employed in hazardous work or in work incompatible with their development;
- Working conditions: Provide fair working conditions for their employees;
- Working hours: Maintain working hours that are reasonable and not excessive;
- Safe environment: Promote and maintain a workplace that is free from violence, threats of violence, bullying, harassment, discrimination, inhumane treatment or abuse;
- Health and safety: Promote a working environment that protects workers' health and wellbeing as well as ensuring there are safe work practices;
- No discrimination: Seek to eliminate discrimination including on grounds of race, colour, sex, age, religion, political opinion, national extraction, sexual orientation, disability, legal status or social origin and promote equality of opportunity and treatment; and
- Associations: Respect workers' freedom of association, recognise and protect their right to collective bargaining and to form, join and administer workers' organisations.

### Health and Safety

At Vaughan, we are committed to providing a healthy and safe workplace for all people involved in our business operations.

We fulfil this commitment by achieving compliance with all applicable work health and safety legislation, industry standards, and best practice in the management of health and safety issues affecting the workplace, as well as being FSC accredited and AS4801 certified.

We expect our suppliers to operate with the level of care and commitment towards the health and safety of the people operating in both their own, and Vaughans workplaces. Suppliers must identify and comply with relevant workplace, and product health and safety, laws and ensure their workers understand and follow health and safety policies, standards and procedures that apply to their work and industry.

In particular we expect our suppliers to:

- Comply with all relevant national and local health and safety legislation including health and safety management and reporting;
- Take reasonable steps to actively identify and manage workplace health and safety risks, through the identification of hazards, evaluation of their risks and implementation of effective risk controls;
- Provide appropriate training, education and resources to all employees to enable them to carry out their duties safely and assist them in understanding their roles and responsibilities in relation to workplace health and safety; and
- Building and maintaining a culture that encourages employees to actively participate in health and safety initiatives and supports workers to raise health and safety issues or concerns without fear of disciplinary action, dismissal or discrimination.

#### Environmental Considerations

At Vaughan, we take our responsibility to care for and protect the environment seriously. We aim to minimise the environmental impacts of our operations, products and services and expect our Suppliers to do the same.

We expect Suppliers to demonstrate that they:

- Adopt environmental standards that meet or exceed applicable legislative and regulatory requirements and relevant standards or codes of practice;
- Implement environmental management processes that identify, control and where possible reduce environmental impact and continually assess the environmental impacts of their operations;
- Minimise waste through efficient use of materials and in particular,
  - maximise recyclable and sustainable materials;
  - minimise the use of energy, water and raw materials where possible;
  - practical efforts should be made at all times to minimise waste and disposal should be done in an environmentally responsible manner;
- Avoid contamination to the local environment and minimise emissions and pollution (air and noise); and
- Set internal improvement targets for environmental performance.

#### Ethics, Anti-bribery and Corruption

Vaughan demonstrates clear ethical standards and behaviour throughout the organisation through



compliance to our policies, procedures and values. Vaughan expects the same standards of behaviour from its Suppliers.

All Suppliers must have appropriate policies and procedures in place in relation to money laundering, insider trading, conflicts of interest, fraud, bribery and corruption as well as the improper payments and/or gifts.

Suppliers must comply with all applicable anti-bribery and anti-corruption laws.

#### Privacy

Vaughan is bound by the Australian Privacy Principles contained in the Privacy Act. We expect our Suppliers to have adequate data privacy and security protection to protect against the unauthorised access, use and disclosure of personal information.

#### Conflict of Interest

Vaughan has an employee Code of Conduct that requires our employees to declare any situations of conflict which would include any conflict of interest that is associated with the procurement of goods or services from a Supplier.

If a Supplier is linked to an employee whether by shareholdings, family relations, friendship etc Vaughan may require the employee to abstain from any Supplier selection decisions.

#### Continuous Improvement

We encourage our Suppliers to go beyond minimum compliance to applicable laws and this Code and to take responsibility to continually improve health and safety, social and environmental conditions and ethical behaviour.

#### Monitoring and Compliance

Suppliers must monitor their compliance with this Code and promptly notify Vaughan of any breaches, allegations of non-compliance or investigation into non-compliance by authorities. Suppliers must take all reasonable steps to address, remedy and prevent any further breaches.

If a Supplier, or another party in its supply chain, is unable to, or fails to, comply with this Code, Vaughan will discuss this issue with the Supplier and may require the Supplier to take such steps as Vaughan considers necessary to address the impact of, and remediate, the non-compliance, or in some cases Vaughan may terminate the relevant Supplier agreement.

# APPENDIX 10 - MODERN SLAVERY IDENTIFICATION & REMEDIATION

## Modern Slavery Identification and Remediation – Supplier/Subcontractor

Where a Vaughan Constructions employee identifies potential non-compliance with the Modern Slavery act/practices not in accordance with the Supplier Code of Conduct. Complete this form to the best of your ability and notify Vaughan Constructions; Managing Director, HR Manager, and relevant National Department Manager.

### Details:

Date	
Supplier/Subcontractor	
Notifier	
Notified Person	

### Contact Details Supplier/Subcontractor:

Contact Person	
Contact Number	
Contact Email	
Business Address	

### Identification:

Please provide a brief description of the non-conformance with the Modern Slavery Act/breach of Supplier Code of Conduct.

--

### Remediation:

Person responsible for remediation	
Initial contact with supplier (time/date/medium)	
Improvement requirements	



Follow up	
Outcome	

If an appropriate outcome cannot be reached, said supplier/subcontractor must be blacklisted from Vaughan operations.

\_\_\_\_\_  
Signature Manager

\_\_\_\_\_  
Signature Director

\_\_\_\_\_  
Name Manager

\_\_\_\_\_  
Name Director

\*Provide copy to the HR Manager for filing

# APPENDIX 11 - SITE INDUCTION WORKER RECORD

\*\* Note this is an exert only from the Site Induction worker record

Authorised: AN	VAUGHAN CONSTRUCTIONS PTY LTD	Date: 31st March 2020
Document: Health & Safety Policy and Management System – Appendix 7.		Revision: 3 / CV-19.

TICK YES ONLY IF EXPLANATION IS CLEAR AND UNDERSTOOD	YES	NO	N/A
<b>UV Protection</b> – clothing that provides suitable UV Protection is required to be worn. No Singlets are permitted.			
<b>Site workplace cleanliness</b> - always use amenities, clean your work area at least daily			
<b>Concrete Washout Area</b> - Concrete trucks & Pumps are to wash out in the designated wash out area.			
<b>Paint &amp; Plaster Washout Area</b> - Paint & Plaster tools are only to be washed out in the designated wash out area			
<b>Rubbish &amp; Recycling</b> - Rubbish placed in bins on site is sorted & recycled. Please use them to keep the site safe			
<b>Safety Signage</b> - this signage is for your safety, ensure it is visible, do not cover or move it			
<b>Electrical Tools &amp; Leads</b> – ensure they are tested and tagged, suspend all leads, no piggyback plugs allowed			
<b>Scaffolding</b> - Only use if complete, Never alter another workers scaffold, report defects			
<b>Explosive Powered Tools</b> - To be used only by qualified operators			
<b>Excavations &amp; Trenches</b> – Obtain an excavation permit prior to commencing any excavation work			
<b>Excavations / Trenches and Penetrations</b> - Always maintain protection barriers			
<b>In Ground Services</b> - The location of all live in ground services has been explained via the Site Management Plan			
<b>Plant and Equipment and Motor Vehicles</b> - To be used only by qualified operators in a safe manner			
<b>Vehicles leaving site</b> - Wheels and tracks of equipment leaving site so that mud is not placed on public roads			
<b>Hazardous Manual Handling and Lifting</b> - Always use correct lifting techniques ( See booklet/site plan )			
<b>Concrete Cutting &amp; Coring Permit</b> - must be obtained prior to commencing cutting and coring work.			
<b>Hot Work Permit</b> - to be obtained prior to commencing works that generate heat, sparks or use open flame			
<b>Welding and Cutting Equipment</b> - To be used only by qualified operators			
<b>225mm (9inch) Angle Grinders</b> - Only double clutch type that stop the blade if it jams are permitted for use			
<b>Hazardous Substances &amp; Dangerous Goods</b> - Ensure products are entered into the site register. Are stored safely in designated areas. Location of spill kits explained.			
<b>Structural Steel Erection</b> - an approved erection sequence is required			
<b>Precast Concrete Panels</b> - an approved erection sequence and bracing plan is required.			
<b>General Prohibitions</b> - See booklet for offence/s that will not be tolerated			
<b>Unsafe work - Report all unsafe work practices and / or hazards to a Vaughan Representative or a H&amp;S Representative ASAP.</b>			
<b>Accident</b> procedures explained? - What to do and how to get help?			
<b>First Aid</b> - Have the first aiders, facilities and procedures been explained?			
<b>Emergency situation</b> - Emergency phone numbers and evacuation plans are displayed in lunch rooms and prominent locations on site.			
<b>MODERN SLAVERY</b>			
Are you attending work voluntarily?			
Are you being paid at or above the award wage?			
Are you a victim of any forced, compulsory or slave labour?			
<b>SITE INDUCTION -QUESTION &amp; ANSWER</b> ( Must be completed successfully to commence work on site)	<b>Pass</b>	<b>Fail</b>	
1) Where is the Emergency Evacuation Point located on site? Answer:			
2) What is the name of at least one First Aider on site? Answer:			
3) Who do you report unsafe work practices or Hazards to? Answer:			
In signing this induction record I acknowledge that I have attended the induction and have received a safety induction booklet and have understood the Health and Safety Policy for this project and agree to abide by the same.			
SIGNED: ..... DATE: .....			

# APPENDIX 12 - SUBCONTRACTOR PREQUALIFICATION



\*\* Note this is an exert only from the Subcontractor Prequalification questionnaire.

## 7. QUALITY MANAGEMENT

### 7.1 Management System (Quality)

Yes No

Does your company have a quality management system?

If "Yes", please attach to this questionnaire.

### 7.2 Responsible / Contact Person

Who is responsible for quality in your company?

Name: \_\_\_\_\_ Contact: \_\_\_\_\_

### 7.3 Use of the Principal Contractor System

If your company does not have a quality assurance program, you are expected to adopt and use the Principal Contractor systems.

## 8. ENVIRONMENTAL MANAGEMENT

### 8.1 Management System

Yes No

Does your company have an environmental management system?

If "Yes", please attach to this questionnaire.

### 8.2 Use of the Principal Contractor System

If your company does not have an environmental management system or program, you are expected to use the Principal Contractor's systems.

## 9.0 MODERN SLAVERY

Yes No

9.1 Do you use any form of forced, compulsory or slave labour?

Do your employees work voluntarily and are entitled to leave work?

Do you provide your employees with a contract agreement that adheres to the relevant employment act of National Employment Standard (NES)?

# OUR VALUES:

## *Respect:*

The support and care for each other and our customers.

## *Integrity:*

Dealing honestly and openly with each other, our subcontractors, consultants and customers.

## *Teamwork:*

Working together to deliver on our promises to each other and our customers.

## *Efficiency:*

Maintaining and developing our strong systems approach.

## *Safety:*

The safety and well-being of our people and subcontractors.