

The background features a large, abstract graphic composed of overlapping triangles in shades of teal, green, and yellow. On the left side, there is a vertical grey bar containing several circular icons: a handshake, a house with a person inside, a group of three people with arms raised, a lightbulb, a heart with a plus sign, and a cycle of three people icons.

SHADFORTH

MODERN

SLAVERY STATEMENT

FY 21-22

Reporting Period July 2021-June 2022





Shadforth **Modern Slavery**

Our Modern Slavery Statement has been prepared in accordance with the requirements of the Modern Slavery Act 2018.

This is the second annual statement for Shadforth, pursuant to the Modern Slavery Act 2018, for the financial year ending 30 June 2022. The statement is provided by the Shadforth group of companies headed by Shadforth's Civil Pty Ltd [ABN 68 162 606 377] and other entities that include, Dirt Wise Pty Ltd [ABN 33 123 070 039], Shadforth Plant Hire Pty Ltd [ABN 21 116 979 714], referred to collectively as 'Shadforth'.

The success of Shadforth has come from forming great relationships with our clients. These relationships have been built on Respect, the positive energy and hard work of our People, our commitment to Safety and our Excellence in delivering quality projects. It is these core values, in conjunction with consultation with key employees, suppliers and trusted advisors, which have guided our commitment to reducing any identified risk of Modern Slavery within our

operations and supply chains. We understand Modern Slavery to be a worldwide issue and acknowledge that we have a responsibility to prevent the risks of child labour, unlawful recruitment, human trafficking, servitude, forced labour etc, through our operations and supply chains, wherever possible.

Shadforth is committed to continuing our learning in this area and will continue to proactively implement and develop policies, ongoing risk assessment and education across all relevant areas of our business including supply chains, to ensure that our business practices contribute to the eradication of Modern Slavery across the globe.

This statement was approved by Ray Shadforth on the 30th November 2022, as the sole Director and Principal governing body of Shadforth's Civil Pty Ltd.

 Ray Shadforth



Organisation Structure, Operations and Supply Chains

Shadforth is an Australian privately owned civil contracting company with 900 direct employees. The Shadforth Head office is located at Forest Glen, Sunshine Coast QLD, with regional offices in Moreton Bay, Wacol and Gold Coast. Shadforth undertakes civil construction works throughout QLD and Northern NSW, working with clients who take pride in creating great communities for Australian families and businesses. Shadforth have been part of the construction of some of Australia's most sought-after residential communities and many commercial and industrial hubs.

Shadforth was established in 1964 and has developed into one of Queensland's largest family-owned civil contracting company's. The success of Shadforth has come from forming great relationships with our clients, subcontractors and suppliers and we are proud to utilise local resources wherever possible.

Shadforth Core Values have been built on respect, positive energy and the hard work of our People, our commitment to a safety culture and our Excellence in delivering quality projects. These form the basis of our Shadforth "Charter", which drives our people to achieve great construction outcomes for each and every project.

Shadforth supply chain plays an integral role in our success. The Shadforth Way sets out our company values that define how we do business - both internally and externally. One of our key values is Relationships - we build lasting relationships through trust and performance. We work closely with our supply chain to ensure they comply with all applicable legislative and regulatory requirements, as well as actively sharing our values. Shadforth supply chain consists solely of Australian entities. This supports the 'buy local' policies and commitments our clients often require, as well as providing Shadforth with greater oversight and ability to manage any risks associated with performance. Shadforth are actively improving due diligence processes to be compliant with all relevant legal obligations including modern slavery requirements.



Risk Assessment and Management

Shadforth core values reflect our commitment to ensuring and protecting the human rights of our employees, clients, business partners and suppliers.

Over this reporting period, Shadforth have undertaken a companywide risk assessment on Modern Slavery, with our operations being deemed as low impact. However, we acknowledge there are potentially higher risks within some areas of our supply chain which have the ability to cause, contribute to or be directly linked to modern slavery.

From the risk assessment undertaken, Shadforth have identified the procurement of construction material through third-party international manufacturers, as a potential risk to contribute to modern slavery practices.

Shadforth are in a stage of consultation with suppliers and stakeholders to identify the extent of this risk and assess any further potential risks of modern slavery practices in order to implement effective governance within our supply chain.

Shadforth HR Department are proactive in assessing the recruitment process to include background reference checking and working rights checks, in an effort to mitigate human trafficking and any chance of child forced labour within our own operations.



Actions Undertaken in the Reporting Period

- During this reporting period, awareness sessions outlining the objectives, actions undertaken and reporting requirements of the Modern Slavery Act 2018, were held across the company, including Executive members, Management, Procurement and recruitment.
- Modern Slavery reporting added into Executive quarterly reports.
- Modern Slavery policy and Whistle blower policies reviewed and updated as required.

Actions for Next Reporting Period

- Continue to deliver Modern Slavery Awareness training for our Management team, procurement and recruitment teams, major subcontractors, and suppliers, in an effort to raise awareness and support with compliance. This shall be measurable in the next reporting period by how many persons undertake the awareness training, reportable through our ShadConnect Platform.
- Implement measures and to strengthen our due diligence of procuring suppliers, so as to efficiently be able to assess risks of our direct and indirect suppliers, along with being able to assess our supply chain. This shall be achieved through the implementation of supplier code of conduct or similar and supplier prequalification, as per current subcontractor prerequisites. Measurable by the implementation of a process to prequalify suppliers, ascertaining where risk level may apply within the supply chains.
- Update subcontractor prequalification and contracts to strengthen the modern slavery assessment, to allow identification of any risks with the subcontractors engaged. Measurable by improved prequalification survey and automated reporting systems set up.
- Updating of terms and conditions and policies and procedures and company systems to capture changed requirements in term of the Modern Slavery Act. Examples – reviewing and updating as required; the current Modern Slavery and Human Rights Policy, Recruitment procedure, Procurement procedures, Subcontractor management etc. Measurable by updated policies and the issuance to relevant persons within our operations, to ensure understanding of requirements and updated policies.





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