



# BMD Group

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## Modern Slavery Statement 2023



WE SEE THINGS  
DIFFERENTLY



## ACKNOWLEDGEMENT OF COUNTRY

The BMD Group acknowledges the Traditional Custodians of the lands in which we operate and pay respect to Elders past, present and emerging.



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A ROLLOVER HAZARD EXISTS. SEAT BELTS MUST BE WORN.



SAFETY WARNING

1236599

SAFETY WARNING

109

DANGER  
DO NOT GET ON OR OFF MOVING VEHICLE





# A message from the CEO

**BMD has grown to become Australia's largest privately-owned construction, consulting, and urban development organisation.**

With projects spanning all parts of Australia, so too does our supply chain. As a leader, we think deeply about how we conduct ourselves as a business and the impact we have on our communities.

Our value system, unique culture and commitment to our people guides everything we do with our Australian owned and family heritage forming an important part of how we conduct ourselves.

We support efforts to protect human rights and prevent modern slavery from ever taking place in our operations and supply chains. Our policies across our code of conduct set our expectations for our people and our supply chain. We are and will continue to remain vigilant to ensure modern slavery never takes a foothold in our business operations.

We welcome the transparency of this annual reporting statement which we provide in accordance with the Modern Slavery Act 2018 (Cth). It has been approved by the Board of Directors of BMD Holdings Pty Ltd on behalf the BMD Group of companies (BMD).

**Scott Power**

GROUP DIRECTOR  
CHIEF EXECUTIVE OFFICER



# Our values

## **FAMILY**

We are proud of our family company heritage. This heritage means we value each individual, we respect and encourage diversity, and we create and promote a sense of belonging.

## **EMPOWERING**

We empower our people to develop the self-belief that will enable them to realise their potential. The resulting flexibility, initiative and responsiveness sustain our business growth and success.

## **COLLABORATIVE**

We work as a team in the belief that collaborative achievement results in creative relationships of long-term mutual benefit. Our no-blame culture focuses on finding what works best, sharing success and enjoying the experience.



## **DETERMINED**

We persist despite the obstacles. We celebrate effort as well as achievement and we are tenacious in our pursuit of the objective.

## **STRIVING TO DO BETTER**

We aspire to be the best at what we do through fresh thinking, hard work, continual learning and a shared sense of purpose. We take great pride in our achievements.

# Our offices

Our experience extends across Australia in the following sectors.

AVIATION

RAIL

PORT

RESOURCES

DEFENCE

TRANSPORT

WATER AND WASTEWATER

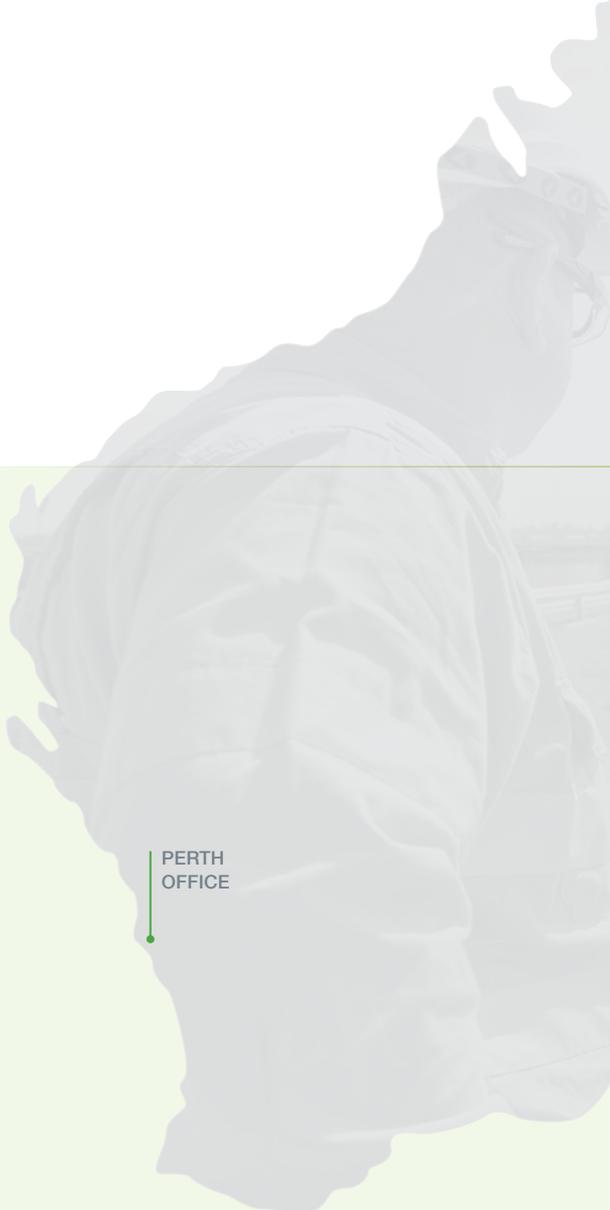
LAND DEVELOPMENT

COMMUNITY INFRASTRUCTURE

BUILDING

ENGINEERING DESIGN

LANDSCAPE CONSTRUCTION



PERTH  
OFFICE



DARWIN  
OFFICE

TOWNSVILLE  
OFFICE

MACKAY  
OFFICE

EMERALD  
OFFICE

GOLD COAST  
OFFICE

BRISBANE  
OFFICE

TOOWOOMBA  
OFFICE

ADELAIDE  
OFFICE

SYDNEY  
OFFICE

CANBERRA  
OFFICE

MELBOURNE  
OFFICE

GEELONG  
OFFICE

HALLAM  
OFFICE

# Our organisation

**BMD employs over 2000 people in addition to the many more who are engaged by our suppliers, consultants, and advisors.**

Our business is our people and we are proud of the long-standing relationships we have built through our 44 year history.

As people are at the core of everything we do, it is our duty to ensure our employees and those within our supply chain are paid and treated fairly.

## BMD HOLDINGS PTY LTD (PARENT)

COMPANY | ACN 010 093 348 | ABN 47 010 093 348

The parent company of a national group of companies engaged in engineering, design, construction and land development for clients and partners in the urban development, transport infrastructure as well as resources and energy sectors.

## BMD CONSTRUCTIONS PTY LIMITED

COMPANY | ACN 010 126 100 | ABN 59 010 126 100

Involved in the provision of major civil construction services for the delivery of infrastructure projects across the transport, defence, rail, energy, water and wastewater, port, resources and oil and gas industries.

## BMD URBAN

COMPANY | ACN 158 035 539 | ABN 65 158 035 539

Our urban division delivers civil infrastructure for clients nationally across a range of sectors, with capabilities including earthworks, pavements and pipeworks.

### EMPOWER ENGINEERS & PROJECT MANAGERS PTY LTD

COMPANY | ACN 010 743 692 | ABN 23 010 743 692

Design and project management consultancy utilised internally by the BMD Group companies and external clients.

### JMAC CONSTRUCTIONS PTY LTD

COMPANY | ACN 065 374 414 | ABN 81 065 374 414

JMac has evolved into one of the industry's leading commercial landscape and building companies. Specialising in landscape construction including residential, commercial, industrial, public infrastructure, environmental rehabilitation and long-term care and maintenance.

### URBEX PTY LTD

COMPANY | ACN 102 865 823 | ABN 24 102 865 823

Property development arm of BMD and creator of innovative living environments and communities.

### NIEPE CONSTRUCTION PTY LTD

COMPANY | ACN 122 112 752 | ABN 65 122 112 752

A leading civil structures subcontractor delivering quality civil concrete structures for important public infrastructure projects.

### ALL INCLUSIVE TRAVEL PTY LTD TRADING AS COMPLETE BUSINESS TRAVEL

COMPANY | ACN 647 898 146 | ABN 74 647 898 146

Corporate and leisure travel agency delivering a superior customer experience and tailored travel management solutions.

### EAST COAST COMMERCIALS

COMPANY | ABN 71 011 036 285

Vehicle dealer and retailer offering the best range of used commercial vehicles in Queensland and a state-of-the-art Service Centre specialising in servicing small trucks, buses and Fiat motorhomes.



# Our supply chains



**BMD works with suppliers who have similar values, ethics, and sustainable business practices, including in relation to human rights. We understand that the risks relating to suppliers will vary depending on industry, geographic location, and company size.**

BMD seeks compliance with modern slavery legislation from suppliers through acceptance of the terms and conditions included within supplier, contractor and/or consultancy agreements, and via the raising of purchase orders.

The procurement of suppliers and materials is common to all of our operations. However, BMD is mainly focused on our engineering and construction business which has a complex supply chain structure to support the differing purposes of each entity. Regardless, all our operations need to act in accordance with our corporate values. All our employees have a responsibility to prevent, identify, and report on concerns they may have in relation to modern slavery within BMD's operations and supply chains.

In the 2023 financial year, BMD (excluding Urbex and Empower Engineers & Project Managers which have minimal procurement spend apart from staffing) spent approximately \$1.39 billion on purchasing products and services from in excess of 6000 subcontractors, suppliers and consultants.

Goods and services purchased included construction materials, uniforms, personal protective equipment, stationery, machinery, equipment hire, car and fleet leasing, design and architecture, communications, traffic management, security, waste, recycling, information technologies, insurance, legal and environmental products.

Purchases made by BMD were made direct with those located in Australia with local Australian operations. Some of these suppliers source internationally before on selling to the local Australian market.

**The main goods and services procured by BMD include:**

- 1. labour - including contractors and labour hire in accordance with all Commonwealth and State/Territory laws and requirements**
- 2. materials - such as quarry products, concrete, and asphalt**
- 3. plant and equipment**

# Understanding our modern slavery risks

**As the key business operations of BMD involve engineering, construction, and the use of natural resources, BMD acknowledges the risk of modern slavery within our supply chains, which although low, need to be monitored and managed.**

The overwhelming majority of BMD's workforce is located in Australia and protected by Federal and State/Territory laws pertaining to industrial relations, workplace health and safety, and human rights. Compliance with such laws is also complemented by BMD's own policies and procedures in areas such as human resources, workplace inclusion and diversity and industrial relations management - which often exceed minimum lawful standards.

BMD's direct sourced material imports are absolutely minimal. The bulk of BMD's requirements being sourced onshore from reputable suppliers, in accordance with their own modern slavery statements and compliance to Australian laws.

As a consequence, BMD has determined its operations and supply chains are at low risk of causing or contributing to modern slavery. However, although minimal there is the potential risk of modern slavery through exposure to international supply chains. Modern slavery practices may occur in the activities of BMD's overseas suppliers or alternatively through local suppliers who may source components of their supply from overseas.

**BMD has identified the following goods and services as representing heightened risk of modern slavery:**

- ▼ **certain information and communication technologies (ICT) equipment**
- ▼ **uniforms and personal protective equipment**
- ▼ **stationery supplies**
- ▼ **casual labour-hire undertaken on a project-specific basis.**





# Actions taken to assess and address modern slavery risks

BMD has risk management processes to assist in identifying areas of concern to allow mitigating action to be taken to lessen these risks, including:

1. BMD's Modern Slavery Policy outlining BMD's commitment to preventing, detecting, and reporting the risk of slavery or human trafficking within BMD's operations and supply chains.
2. The provision of mandatory modern slavery clauses in all procurement contracts such as purchase orders, labour hire contracts and subcontractor/ supplier agreements. These provisions are extensive and provide for significant warranties from suppliers and subcontractors that they are not just complying with modern slavery laws but placing a positive obligation upon them to advise BMD of any breaches or potential breaches of the law. This authorises BMD to undertake audits and checks to ensure they are complying with their contractual and legal obligations in relation to modern slavery practices.
3. Due diligence processes when taking on new suppliers, including verification and audit checks.
4. Highlighting its Code of Conduct for suppliers, which details the expectations on all suppliers in relation to preventing modern slavery.
5. The existence of its Serious Misconduct Disclosure Policy, which enables all employees to comfortably and confidentially report any concerns they have relating to modern slavery in BMD's operations and supply chains.
6. A supplier questionnaire is sent to high-risk suppliers to ensure compliance with BMD's and the supplier's contractual and lawful obligations. The 2023 supplier questionnaire was sent to over 70 supply chain partners requiring them to answer questions about modern slavery compliance within their own business and their supply chains. The data collected resulted in no cases of modern slavery found, no concerns raised regarding modern slavery and human rights in their operations and supply chains, and no charges or investigations in relation to breaches of modern slavery or human rights. This includes no breaches by their workforce, agents or subcontractors.

7. Modern slavery training for all employees highlighting the practices which may constitute modern slavery and how to manage the risks faced by BMD.

8. Additional modern slavery workshops with relevant staff in finance, legal, and procurement roles on due diligence processes to ensure compliance.

9. As BMD expands globally into the UK and Philippines we take our values, high standards and knowledge in the modern slavery space to help guide us in those expansions, whilst understanding and learning the modern slavery practices from those parts of the globe to continually improve our compliance locally.

A business wide Audit and Risk Committee was established in 2023 with an external Chair (CEO Knauf) to take the place of the Legislative and Regulatory Compliance Committee and includes BMD's CEO and two Directors as members. The Committee tracks and considers modern slavery legislation and related issues that impact all levels of BMD's operations.

#### REMEDICATION

After receiving any report of a modern slavery incident, the Committee will meet to prepare a report to the BMD Group Board including potential remediation strategies. The main form of action may include reviewing and improving existing policies and procedures; additional employee and supplier education programs; more detailed surveys and auditing; and ceasing relevant activities including terminating contracts with non-complying suppliers.



# Assessing the effectiveness of actions taken

In the 2023 year, the BMD Group continued to foster our relationships with suppliers to gain a better knowledge and understanding of their businesses to ensure that any potential risks of modern slavery occurring within a supplier's operations could be addressed and dealt with as quickly as possible.

For the foreseeable future, we will conduct an annual compulsory survey of suppliers of differing goods and services on a rotational basis as a component of risk assessment of modern slavery.

BMD will continue to review the effectiveness of our actions and processes to address modern slavery concerns and risks through the auspices of the Audit and Risk Committee.

As BMD continues to grow, in 2023 the Sustainability (EESG) Committee was established to ensure that the BMD Group ('BMD') is operating in a manner that is environmentally, socially, and economically sustainable. The purpose of the Sustainability (EESG) Committee is to provide oversight and guidance on BMD's sustainability and EESG strategy, including compliance with related laws, regulations, and policies.

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## Consultation process

BMD has implemented a Modern Slavery Policy which outlines our commitment to prevent, detect, and report the risk of slavery or human trafficking within our operations and supply chains. This policy also articulates the fundamental elements of our approach to human rights, and how we demonstrate our commitment to respect human rights in line with international frameworks.

This policy applies to all directors, senior management and employees across every level of the BMD Group (including full-time, part-time and casual). It is applied in addition to BMD's existing Employee Handbook, which is limited to the conduct of employees in relation to dealings with clients, colleagues and other stakeholders.



As BMD continues to grow, so does our commitment to continuous improvement and playing our part in the prevention of modern slavery in the foreseeable future.

**WE SEE THINGS  
DIFFERENTLY**





**OUR BUSINESS  
IS OUR PEOPLE**



@BMDGroup

[bmd.com.au](http://bmd.com.au)