

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 dark grey vertical band containing several faint, circular icons: a handshake, a house with a person inside, 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 20-21

Reporting Period July 2020-June 2021





Shadforth **Modern Slavery**

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

This Statement is provided by the Shadforth group of companies headed by Shadforth's Civil Pty Ltd and other entities that include, Dirt Wise Pty Ltd, Shadforth Plant Hire Pty Ltd, 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 a safety culture 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 review the 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 abate 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 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 17 December 2021, as the sole director and principal governing body of Shadforth's Civil Pty Ltd.



Organisation Structure, Operations and Supply Chains

Shadforth is a privately owned civil contracting company with over 800 employees. 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 has been part of the construction of some of Australia's most sought-after residential communities and many commercial and industrial hubs.

As Queensland's largest family-owned civil contracting company, the success of Shadforth has come from forming great relationships with our clients, subcontractors and suppliers. These relationships have been built on Respect, the positive energy and hard work of our People, our commitment to a Safety Culture and our Excellence in delivering quality projects.

These Core Values form the basis of our Shadforth "Charter", which drives our people to achieve great construction outcomes for each and every project.

Through the risk assessment conducted during the reporting period, Shadforth have identified four key areas within our supply chain, where potential vulnerability could be attributed:

- Labour and Resources
- Subcontractors and Consultants
- Plant and Equipment Hire
- Material Supply

From these key areas identified, Shadforth sources internal and external labour hire, employee uniform and personal protective equipment, construction materials including raw resources, plant and equipment hire, design services and consultancy services.

Shadforth currently engaged approximately 1200 subcontractors who operate within our local regions across Southeast QLD. Whilst Shadforth primarily engages with local Australian suppliers with an emphasis on sourcing local supplies and labour resources in the regions in which we work, to promote and support local economic development, we acknowledge that a large portion of our construction material supplies are from international sources, which potentially increases our risk via the supply chain.



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 has 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 may have the ability to cause, contribute to or be directly linked to modern slavery.

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

Shadforth is 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 for Next Reporting Period

- Create and 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 to strengthen our due diligence of procurement of 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 levels may apply within the supply chains.
- Update subcontractor prequalification to strengthen the modern slavery assessment, to allow better identification of any risks associated with the subcontractors engaged. Measurable by improved prequalification survey and automated reporting systems set up.





Shadforth Civil Pty Ltd

ABN: 68 162 606 377

99 Sandalwood Lane,
Forest Glen QLD 4556

T: 07 5458 3300

E: tenders@shadcivil.com.au