

1 IDENTIFICATION

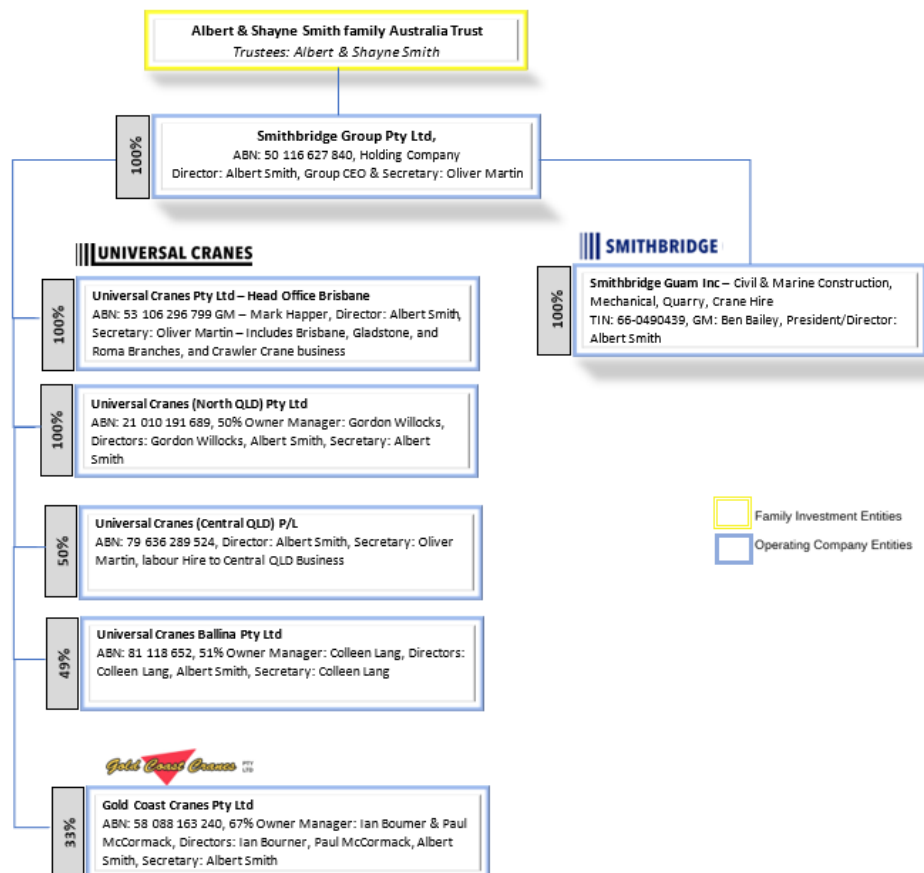
This Joint Statement is Smithbridge Group's first Modern Slavery Statement covering the 01 July 2019 to 30 June 2020 reporting period in accordance with the Modern Slavery Act 2018. Smithbridge Group is a privately owned family business with over 500 employees, operating as Universal Cranes throughout Australia and Smithbridge Guam in the Micronesian Islands. The group has a strong history of providing high quality, innovative construction services and equipment to Australian contractors since 2000, and the broader Pacific region for 50 years.

Smithbridge Group will be assessing the effectiveness of the actions outlined in this Statement, while aiming to maintain the highest standards around business ethics, with the goal to increase the understanding and knowledge of Modern Slavery risks. Smithbridge Group will continue to review its actions, to prevent exploitative practises of Modern Slavery in the context of abuse of vulnerability, excessive gain, and sustained action.

2 OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

SMITHBRIDGE GROUP STRUCTURE

Smithbridge Group Structure



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UNIVERSAL CRANES PTY LTD

Universal Cranes has been a leading crane hire and lift engineering solutions provider for nearly 30 years. As crane experts and lift engineers, it delivers professional crane hire solutions across Queensland, New South Wales, and Victoria.



UNIVERSAL CRANES (CENTRAL QLD)

Universal Cranes Central Queensland provides labour hire services to the Universal Cranes business in Central Queensland.



UNIVERSAL CRANES (NORTH QLD)

Universal Cranes North Queensland provides Franna, mobile, and crawler crane hire throughout the region. From Mackay and the central Queensland coal fields of Moranbah and Dysart to the Torres Straits, to the mineral region around Mt Isa, and the Gulf country of Karumba, Weipa, and Borroloola in the NT.



UNIVERSAL CRANES (BALLINA)

Universal Cranes Ballina opened in 2006, delivering mobile crane solutions to the northern New South Wales region.



GOLD COAST CRANES


Gold Coast Cranes has a fleet comprising of 30 cranes from 12t – 25t pick and carry cranes & 10t – 130t mobile cranes. Gold Coast Cranes also runs a fleet of transport vehicles from low loaders and semi-trailers to self-loading trucks which work in conjunction with their crane fleet.



SMITHBRIDGE GUAM

Smithbridge Guam is a multi-discipline contractor with civil, structural, and mechanical engineering and construction capabilities with the largest fleet of heavy equipment and cranes for hire on the island. It produces high-quality aggregate and construction materials from its own quarry at Yigo, with ready mix concrete supply and precast concrete design and production.



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SUPPLY CHAIN

Under the UN Guiding Principles on Business and Human Rights and the civil society’s priority recommendations, Smithbridge Group recognises its responsibility to respect human rights including acts to prevent, mitigate and remedy Modern Slavery within our operations and supply chains.

The Key challenges identified under the *UNGP Australian Human Rights Commission Joint Civil Society Statement, August 2016* requiring attention:

- Migrant labour exploitation in Australia
- Labour abuses in the supply chains of Australian businesses
- Role of the institutional investors and finance institutions in contributing, through their funding activities, to the commission of business-related human rights abuses
- Offshore operations of Australian companies

Smithbridge Group will be developing a Modern Slavery guideline for all business units, which states they are required to do their own due diligence on major suppliers. Where evidence of a high-risk event or situation in relation to Modern Slavery has been identified by a BU, the CEO and board will be notified.


A self-assessment questionnaire will be developed and implemented to address the risks of Modern Slavery and improve the overall quality of business and integrity in operations and supply chains. The self-assessment questionnaire will be designed to support the identification of Modern Slavery risks, foster collaborative efforts between suppliers and organisations to then address these risks, improve transparency and identify any other areas for further due diligence.

3 RISKS

The risk of Modern Slavery begins with the hiring of the main contractor, and the compliance with legal and social standards with their employment of staff, to prevent third-party contractors exploiting practises and people. When identifying the risk associated with Modern Slavery in construction, the materials and products used have their own supply chain and risk related components.

The higher risk area identified for Smithbridge Group and its subsidiaries falls under the construction sector, with an elevated risk of occurrence in the operations and supply chains outside Australia. Smithbridge Group recognises the significance of identifying the risk to people to ultimately prevent harm from occurring, coupled with the integration of appropriate controls in operations and supply chains. Common Modern Slavery practises in property and construction include:

- Forced or unpaid work
- Unsafe conditions
- Bonded and child labour
- Inadequate accommodation
- Passport confiscation
- Human trafficking

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4 CONTROLS

Smithbridge Group understand the obligations for respecting human rights in its own operations and supply chains and the vision for continual improvement through its policies, standards, and due diligence to address Modern Slavery and the risks associated. The below current controls and practices have been utilised and implemented, with the goal to eliminate Modern Slavery in business operations and supply chains across. Smithbridge Group are to review and approve all policies and guidelines for all its subsidiaries in relation to Modern Slavery and the associated risks.

WHISTLE BLOWER POLICY

Smithbridge Group is committed to promoting the highest standards of ethical practices and safety management within all company activities and taking practical steps to eliminate or reduce risk to our employees, as well as other persons engaging under the company’s control. The whistle blower policy encourages employees to speak up about misconducts including illegal activity and reporting concerns under *The Commonwealth Modern Slavery Act 2018*, with the importance of confidentiality to raise a concern or issue identified without fear of retribution from other employees.


CODE OF CONDUCT

The Code of Conduct applies to all employees of Smithbridge Group. It governs the way employees must behave towards customers, suppliers, co-workers, company management and the public. As a representative of the Smithbridge Group and its subsidiaries, employees are expected to observe the highest standard of ethics, integrity, and behaviour during employment, while conducting themselves in a professional and courteous manner. The Code of Conduct policy highlights the specific standards of behaviour, while complying with all laws, company policies, rules and regulations set out by the Group and its subsidiaries. Failure to comply or breaches of the Code are deemed a very serious matter and treated as serious misconduct including potential termination of employment.

5 EVALUATION

Smithbridge Group is currently assessing external options for training modules addressing Modern Slavery which will be accessible across the Smithbridge Group. The goal for professional development will seek to provide the necessary knowledge for managers when conducting audits, with the implementation of a Guideline ensuring the entire business operation takes responsibility for our role in eradicating modern slavery. With the vision to eliminate acts or risks of Modern Slavery caused or contributed by our business operations and supply chains, all senior and department managers will be required to complete training on the risk and impacts of Modern Slavery within the business operations or supply chains.

Smithbridge Group will be responsible for the evaluation of the business unit’s self-questionnaire results in relation to Modern Slavery mentioned in Section 2. Supply chain. Based on the outcome of the combined evaluations for all business units, it will then be the responsibility of Smithbridge Group to ensure any change required is addressed.

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6 CONSULTATION


Smithbridge Group will provide ongoing communication to its subsidiaries through the Group Safety Committee and Branch Management Meetings.

APPROVAL

This Statement was approved by the Advisory Board on the 20th of August 2021 and signed by the Group CEO on the 31st of March 2021

Signed in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)*:

	31st March 2021
Signature	Date:
Oliver Martin	Group CEO
Name:	Role:

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