# **MODERN SLAVERY STATEMENT**

FINANCIAL YEAR 2023-2024

Version 1.0

FITOUT REFURBISHMENT CONSTRUCTION

# Renascent

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#### **INTRODUCTION**

Modern slavery is a crime that is estimated to violate the fundamental human rights of some 45 million men, women and children globally, through situations of exploitation, threats, coercion and deception.

The term 'modern slavery' is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. The definition of 'modern slavery' under the Modern Slavery Act includes serious exploitation such as trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services.

As part of our modern slavery assessment, we have collated data and performed analysis across all reporting entities and their controlled entities, as the controlled entities are also considered reporting entities for purposes of this statement.

#### **OUR COMMITMENT**

Renascent is committed to eliminating the potential for modern slavery practices in our operations and supply chain across all levels of the business. Respecting human rights aligns with our core values and beliefs and we aim to treat everyone fairly and create a workplace and operating environment that is safe, ethical and transparent.

We have commenced our journey with rigour and taken meaningful steps to address modern slavery risk in our first year of reporting. As we progress, we will continue to address next steps and refine and further improve our approach and assessment to identify and respond to the risk of modern slavery practices within our organisation.

### **1.0 REPORTING ENTITY**

This statement is issued on behalf of Renascent Australia Pty Ltd, and its wholly owned subsidiaries, including Renascent Regional Pty Ltd, Renascent Constructions (Victoria) Pty Ltd, Renascent Western Australia Pty Ltd, Renascent Queensland Pty Ltd, and Dice Renascent Pty Ltd (collectively referred to as Renascent, we, us, or our), in accordance with the Modern Slavery Act 2018 (Cth).

From an operational standpoint, these six Australian entities function as a single entity, with shared board members, corporate functions, policies, and procedures.

# 2.0 COMPANY STRUCTURE, OPERATIONS AND SUPPLY CHAIN

#### 2.1 Our Structure

Renascent is a privately owned construction company that has been serving government and private clients since 1995. Our expertise lies in construction, refurbishment, fit-out, and facilities maintenance. We take pride in our strong connection with the local community and our commitment to giving back.

With offices strategically located in Sydney (NSW), Orange (NSW), Melbourne (VIC), Brisbane (QLD), Canberra (ACT), Perth (WA), and Tivendale (NT), our teams actively engage with the Australian community, supporting various local, civic, professional boards, and charitable organisations. We believe in sharing our success with those around us.

While each of our entities operates as a stand-alone business, they are governed and managed by the Renascent Board of Directors, our Executive Management Committee, and our Senior Executives and Managers. Notably, Dice Renascent is a jointly owned and operated indigenous company, with a 51-49 ownership structure respectively.

All of our entities comply with a unified set of policies, procedures, plans, and an integrated management system, overseen by the Renascent Board of Directors, our Executive Management Committee, and our Senior Executives and Managers.





#### Sydney, NSW (Head Office)

Level 4, 174 Pacific Hwy St Leonards NSW 2065 Renascent Australia Pty Ltd, ABN: 53 109 220 760



#### Canberra, ACT

Level 5, 17 Moore Street, Canberra ACT 2601 Renascent Australia Pty Ltd (ACT Branch), ABN: 53 109 220 760



#### Melbourne, VIC

Level 4, 101 Moray St South Melbourne VIC 3205 Renascent Constructions Pty Ltd (Victoria), ABN: 54 135 571 765



### Orange, NSW

Level 1, 171 Lords Place Orange NSW 2800 Renascent Regional Pty Ltd, ABN: 38 158 296 265



#### Brisbane, QLD

Level 6, 200 Adelaide Street, Brisbane QLD 4000 Renascent QLD Pty Ltd, ABN: 83 125 718 229



## Perth, WA

Level 11, 225 St Georges Terrace, Perth WA 6000 Renascent Western Australia Pty Ltd, ABN: 59 608 156 136



#### Tivendale, NT

4/15 Fowlestone Road, Tivendale NT 0822 Dice Renascent Pty Ltd, ABN: 39 608 262 540

#### 2.2 Our Business Operations

Renascent is a construction company specialising in fit-out, refurbishment and construction services. As the head contractor, we play a crucial role in evaluating, engaging and monitoring numerous subcontractors who assist us in executing our projects. Additionally, we manage significant procurement activities to fulfil project requirements on behalf of our clients.

Safety is a top priority at all our sites, and effective management is ingrained in our entire team, from the managing directors to our site personnel. Renascent has implemented robust processes and procedures to ensure compliance with relevant legislation and standards, including the Fair Work Act 2009, respective state Work Health and Safety Acts, and the Modern Slavery Act 2018 (Cth).

We maintain an outstanding safety record across all projects, demonstrating our unwavering commitment to governance. This commitment is reinforced by the continuous development and improvement of our accredited integrated management systems. As responsible members of the corporate community, we adhere to industry best practices and strengthen our governance framework through regular internal and external audits.

At Renascent, we hold various accreditations that exemplify our commitment to excellence in project execution. These accreditations showcase our dedication to upholding the highest standards in our industry.



#### 2.3 Our Supply Chain

Renascent operates with a team of over 150 employees, managing up to 30 active projects across various industry sectors simultaneously. Our dedicated team is the driving force behind the reliability and success of our projects. We value the diversity of our employees, who bring unique perspectives, techniques, and strategies to our Renascent family. Together, we form a highly dynamic team capable of confidently tackling every project.

To deliver our projects, we heavily rely on subcontractors and suppliers. Subcontractors play a crucial role in procuring the necessary products and materials within their respective packages, adhering to the project's scope and specifications. In certain cases, Renascent or our clients may directly handle procurement decisions.

In our supplier engagement and management processes, we have integrated ongoing due diligence and oversight of Modern Slavery risks for existing suppliers. As a prerequisite for new vendors, we now require their mandatory acknowledgement of our Modern Slavery objectives, ensuring their understanding and compliance.

### 3.0 MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

As we continue to integrate supply chain risk management systems and processes, we are adopting a phased approach to enhance transparency across both our direct and extended supply chains in the regions where we operate.

The construction industry has long relied on low-skilled, manual labour, often sourced from migrant workers, which makes it particularly susceptible to risks such as debt bondage, human trafficking, and forced labour practices. Specifically, the indirect use of site labour, involving low-skilled manual work recruited by subcontractors through labour hire agencies, presents a significant area that requires greater transparency within the construction sector.

Additionally, another area of concern is the lack of visibility within multi-tiered manufacturing supply chains for construction materials. These materials are often sourced, processed, assembled, and finished across multiple countries, some of which have a higher risk of modern slavery. The transient nature of these production phases, coupled with the difficulty in tracing the materials through to the end user, exacerbates the challenge in identifying and addressing these risks.

Globally, the construction industry is home to 18% of modern slavery victims, marking it as a high-risk sector. Common modern slavery risks in construction include:

- Forced or unpaid labour
- Child labour
- Unsafe working conditions
- Debt bondage

The high rate of victimisation is driven by factors such as:

- A significant demand for low-skilled labour
- · Limited visibility over the supply chain, often due to outsourcing
- Sourcing materials from regions with elevated risks of modern slavery.

### 4.0 ACTIONS TAKEN TO ASSESS AND ADDRESS OUR MODERN SLAVERY RISKS

Renascent's efforts to minimize modern slavery risks and ensure that these risks are considered in all operational and supply chain relationships have been a continuous and evolving commitment.

Our commitment has been supported through key actions undertaken during the reporting period:

Strategy	Purpose	Key Actions
Policy ×– Requirement	Renascent reviews its policies annually to ensure ongoing compliance with all relevant laws and regulations, making necessary updates to address any changes in legal requirements, industry standards, or internal processes.	<ul> <li>Modern Slavery Policy         <ul> <li>Implemented Commitment to Zero Tolerance approach to modern slavery</li> <li>Implemented Renascent's Guide to Anti-Modern Slavery</li> </ul> </li> <li>Whistleblower Protection Policy         <ul> <li>Annual general review and acknowledgement</li> </ul> </li> </ul>
Due Diligence	Renascent demonstrates its due diligence in minimising modern slavery risks by ensuring that all suppliers and external providers acknowledge and comply with modern slavery regulations, as part of our ongoing commitment to responsible sourcing and ethical business practices.	<ul> <li>External Provider compliance forms</li> <li>Suppliers and external providers are required to acknowledge and adhere to anti-modern slavery regulations and commitments after implementing Renascent's: <ul> <li>Supplier Set Up Form</li> <li>Consultant Form</li> </ul> </li> <li>Modern Slavery Management Plan FY23-24</li> <li>Our plan imposed a risk management matrix to identify the scope, consequences, actions and controls of modern slavery risks.</li> <li>Further, we established three (3) principles to enhance compliant engagement with external providers: <ul> <li>Build meaningful partnerships by providing support to external providers to improve their response to modern slavery.</li> </ul> </li> <li>Tailor our risk-based approach that prioritises high-risk external providers by assessing and categorising subcontractors and suppliers based on their risk levels, focusing resources and attention on those identified as high-risk.</li> <li><i>Recognise our influence to change</i> by considering whether we should provide for or cooperate in remedying actual impact.</li> </ul>

		<b>'Modern Slavery and Whistleblower Protections</b> <b>Policy' training session</b> by legal service provider, Gadens:
Training and Awareness	Renascent promotes and raises awareness regarding modern slavery risks by requiring employees to undergo training and awareness programs, ensuring they are equipped with the knowledge to identify, report, and mitigate potential risks in our operations and supply chains.	<ul> <li>Identifying modern slavery victims         <ul> <li>Risks in internal operations</li> <li>Information on how and where to report</li> <li>Protections during and after reporting</li> </ul> </li> <li>Modern Slavery Posters (Multilingual) – breaking language barriers and risks:         <ul> <li>English</li> <li>Vietnamese</li> <li>French</li> <li>Arabic</li> <li>Spanish</li> </ul> </li> </ul>

## **5.0 ASSESSING OUR EFFECTIVENESS OF ACTIONS TAKEN**

Renascent recognises that our assessment of identifying and addressing modern slavery risks in our operations will be ongoing and evolving process. In evaluating our current effectiveness of our anti-modern slavery efforts, we have taken the following key actions:

1. In evaluating the effectiveness of our actions during the reporting period, we have continued to drive the **Modern Slavery Working Group.** This group is tasked with addressing and implementing Renascent's key initiatives to combat and prevent modern slavery within our operations.

In FY23-24, our Modern Slavery Working Group has concentrated on enhancing our understanding of modern slavery risks and how these risks manifests in our operations and supply chains, through the development of our Modern Slavery Management Plan. While we are currently unable to provide data-driven measures, we will be commencing the initiation of a Risk Assessment for FY24-25.

The group will ongoingly assess and review our strategy, ensuring that it adapts to evolving risks and the expansion of our operations, while upholding our commitment to an anti-modern slavery stance.

- 2. Renascent is actively monitoring the effectiveness of our policy requirements by requiring all new employees to submit their **policy acknowledgment**. This ensures that we have clearly communicated our anti-modern slavery stance and compliance expectations. It also helps us verify that employees understand and align with our strategy, while providing a record of their acknowledgment for compliance tracking. Through this process, we aim to ensure that our anti-modern slavery efforts are consistently reinforced as we grow and integrated into the daily actions of our workforce. We will continue to review and enhance our policies and policy requirements, in line with continuous improvement.
- 3. Additionally, we issued **Training Certificates** to employees upon completion of our 'Modern Slavery and Whistleblower Protections Policy' training session. By certifying their

participation, we were able to assess the extent to which our anti-modern slavery strategy was understood, absorbed, and integrated by our workforce. This process not only confirmed employee engagement with the training but also allowed us to evaluate the effectiveness of our communication and whether the key concepts were successfully conveyed. Furthermore, the certification provided a valuable record of compliance and engagement, which we can use to track progress and identify any areas where further training or support may be needed to strengthen our strategy.

### 6.0 CONSULTATION WITH OWNED/CONTROLLED ENTITIES

Renascent's National ELT Committee oversees and manages all entities and subsidiaries of the Company (refer to <u>Section 1.0</u>). In the development of this statement, the National ELT Committee, in conjunction with the Senior Management Team of all reporting entities, engaged in formal consultations to a) identify key findings and messages, and b) review and align on strategies and actions to mitigate modern slavery risks.

Additionally, the draft of the Modern Slavery Statement is presented to the National ELT Committee and the Senior Management Team of all reporting entities for review before being formally acknowledged by the Board of Directors and published. This process ensures thorough consultation, alignment, and commitment at all levels of the organisation.

# 7.0 CONTINUOUS IMPROVEMENT

We recognise that tackling widespread modern slavery in global supply chains demands strong collaboration not only with our suppliers but also with governments, industry partners, and civil society.

We are committed to eliminating modern slavery risks from our supply chains and are continuously advancing our initiatives through close collaboration with our suppliers, employees, and stakeholders.

During the FY 2024-2025 reporting period, Renascent is dedicated to the following actions:

- **Risk Assessment**: Conduct a thorough risk assessment to identify any new risks related to modern slavery. Review the findings and establish a plan to monitor and mitigate the most significant risks.
- **Training and Awareness**: We recognise the importance of closely monitoring our supply chain process. We are committed to providing additional training to departments that directly coordinate and collaborate with our external providers on identifying modern slavery risks in our operations.
- **Policy Requirement**: While we review and update our policies annually and publish them on our shared website for current employees, we acknowledge the importance of consistent and mandatory reinforcement. Therefore, Renascent will aim to require current employees to formally acknowledge our reviewed and updated policies annually.

By undertaking these actions, we aim to strengthen our proactive approach to combatting modern slavery and create a work environment that is free from exploitation and injustice.

## 8.0 DECLARATION AND APPROVAL

This statement was approved by the Board of Directors of Renascent Australia Pty Ltd on 27<sup>th</sup> March 2025:

Andrew Melville Joint Managing Director

31 March 2025

Date

Tony Hargreaves Joint Managing Director

31 March 2025

Date