

MODERN SLAVERY STATEMENT 2023 – 2024

Purpose & Scope

Huon Contractors recognises that Modern Slavery is a global issue and that it affects vulnerable individuals and communities around the world. We are committed to ensuring there is no Modern Slavery or human trafficking in our business or supply chains as well as maintaining transparency through the procurement of goods and services consistent with the obligations under the Modern Slavery Act 2018 (“Act”).

Our Business

Huon is a civil engineering construction business specialising in road, rail, bridge, and subdivision works in the ACT and NSW. We deliver infrastructure projects to government and private sector clients. Huon is a solutions-orientated company and strives for excellence in its staff and customer relationships.

Huon Contractors is 100% Australian owned and operated and employs 70 full-time employees and engage various subcontractors and suppliers for the procurement of materials, equipment, and services.

Our supply chain consists of local suppliers, with a focus on construction-related materials, plant and equipment, and subcontracted labour.

The aforementioned materials, plant, equipment and services originate from both Australia and overseas.

Our Objectives and outcomes

Guided by its values, the objective of this Modern Slavery Statement is to ensure Huon Contractors develops and conducts all business activities in an ethical manner through the following objectives.

2023 – 2024 Objectives	Outcomes
Provide training to all employees on recognising modern slavery in the workplace and within our supply chains.	100% site Management Staff responsible for procurement have completed internal Modern Slavery Training. To be refreshed 12 monthly.
Enforce a zero-tolerance to modern slavery in the workplace.	Company induction updated to ensure all workers are aware of Huon’s zero tolerance to Modern Slavery in the workplace.
Implement and enforce effective systems and controls to ensure modern slavery does not occur anywhere in our business or supply chains.	Supplier code of conduct issued as part of tender process. Subcontractor Risk Register updated to include Modern Slavery Risk Level for each subcontractor and supplier.
Review & monitor through internal auditing processes.	Internal Audits undertaken for compliance with nil issues identified.

Huon’s vision is that the collective actions taken as outlined in this MSS will progressively reduce the risk of modern slavery within its supply chain.

Modern Slavery Risks

The Risk of Directly Causing Modern Slavery

Huon operates solely within Australia. As Huon's labour engagement and management policies and practices are structured strictly in accordance with the relevant laws, the risk of Huon directly causing modern slavery is considered low.

The Risk of Contributing to Modern Slavery

Huon understands that its businesses are at risk of contributing to modern slavery through its operations and/or actions in its supply chains. This includes acts or omissions that may facilitate or incentivise modern slavery through commercial pressures. As Huon's procurement practices are governed by a layered approval process, this risk is considered to be an unlikely occurrence. The pre-qualifications and awareness raising actions described below will further reduce this risk.

Direct Link to Modern Slavery

Huon acknowledges that it is at risk of being connected to modern slavery through the activities of other entities that we have business relationships with, namely our suppliers and contractors. Further, supply chain partners of our direct suppliers and contractors also present risk. Given the diversity and depth of parts of our supply chain, it is links of this nature that are considered Huon's most significant risk of exposure to modern slavery.

In particular, the risks of modern slavery are most likely to arise from:

1. Materials sourced from overseas regions at risk of modern slavery; and
2. Local trades where unskilled or semi-skilled labour is sourced.

Given the above, Huon's actions will prioritise assessing and addressing these risks.

Consultation with Entities

Huon acknowledges that all the entities have an equal role to play in understanding, identifying, and reporting any known incidents of Modern Slavery.

The process of consultation involves discussions with Directors and Managers of our operating entities to inform them of Huon's obligations under the Modern Slavery Act and to gather their input on our collective approach to addressing this social governance issue.

Huon will continue to engage its stakeholder groups to seek opportunities for improved awareness, due diligence, and cooperation amongst all parties.

Reporting and Measuring Effectiveness.

Huon's response to modern slavery is incorporated into its operating framework, facilitating the following opportunities to report and measure effectiveness:

- Continue to undertake internal audits measuring compliance with our operating framework.
- The record keeping required by the framework will enable analysis of effectiveness year on year, including in instances where specific modern slavery risks are identified.
- Supplier Surveys from our supply chain partners are required to be updated biennially, enabling Huon to track increased comprehensiveness of responses and improved engagement practices within supply chains.

Huon's engagement with suppliers through its Supplier Surveys and the discussions and actions that follow will foster an increased awareness of modern slavery and the expectations around it, particularly in respect of suppliers whose programs are still in early stages of implementation.

Our 2024 – 2025 Objectives

Our key objectives for the 2024-2025 financial year include enhancing supplier due diligence through increased on-site audits and expanding our employee training to cover new and emerging risks.

- All new and existing suppliers are required to reconfirm their commitment to ethical labour practices by completing F92 Modern Slavery Survey.
- Modern Slavery zero tolerance to be included within Project Inductions.
- Updated Modern Slavery Training (internal) to reflect new case studies and risk scenarios.
- Conduct random supplier audits and risk assessments particularly for high-risk categories such as imported construction materials.

These efforts will ensure that Huon remains proactive in identifying and addressing modern slavery risks in all aspects of our operations.

Responsibility for this statement

The prevention, detection, and reporting of modern slavery in any part of the business or supply chains is the responsibility of all those working for Huon Contractors or under its control, including all employees, subcontractors, and suppliers. Every person engaged or caused to be engaged has the responsibility to avoid any activity that might lead to or suggest a breach of this statement.

Anisha Sachdeva-Marar (Director) has approved this Modern Slavery Statement and has overall responsibility for ensuring that it complies with legal and ethical obligations, and that all those engaged under Huon Contractors control comply with it.

Management at all levels are responsible for ensuring those reporting to them are aware of and understand and comply with this and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Approval of this Modern Slavery Statement

This statement has the approval of the Statutory Board.

Anisha Sachdeva-Marar

DIRECTOR

03/02/2025

