



# Modern Slavery Statement 2024

MABEN GROUP PTY. LTD.  
ABN: 65 107 657 152

# MABEN



# Who Are We

Maben Group Pty. Ltd. is a leading, privately owned commercial construction company operating in Melbourne and throughout Victoria, with approximately 100 employees.

We are a driven and engaged firm with a strong focus on delivering complex and high-quality commercial construction projects. Our vision is to provide fulfilling opportunities for skilled people who are creating a legacy of great buildings, with four defining principles of Focus, Leadership, Collaboration and Delivery.

Whilst local supply of materials and labour is preferred, the supply chain for the Australian commercial construction sector extends globally.

Most of our supply chains are established with local operations, sourcing materials from within Australia and procuring through subcontractors on a supply and installation basis. However, where local procurement is unavailable or internationally imported products are specified, we are improving our methods to identify supply chain risks and increase subcontractor accountability.

## Risks of Modern Slavery

We remain vigilant to the risk of slavery and recognise that in specific markets, workforces are victims of exploitation and trafficking. Maben acknowledges that the construction industry is a high-risk sector due to large, diverse, complex supply chains. Maben understands the growing need to recognise potential modern slavery risks and work towards greater transparency to eliminate human rights abuses.

Whilst we have not identified any instances of modern slavery within our direct supply chain, Maben acknowledges that several risk factors within the industry could contribute to modern slavery globally. These include:

- **Origin of Manufacturing & Products:** countries of origin manufacturing products and sourcing material
- **Labour Risk:** Labour hire & transient labour services provided by migrant workers, transient/casual employees, and low skill workers
- **Subconsultant Locations:** engaging subconsultants in overseas locations subject to weaker human rights and worker protection
- **Grievance Procedures:** Lack of grievance procedures, with smaller business often having access to limited reporting policies and procedures



# Risks Mitigating Actions

Our operations function under one standard quality management system with which all employees and directors must comply.

We have policies, procedures, and training on operating, acting, and behaving, including a Code of Conduct and policies on Anti-Slavery, Equal Opportunity, Bullying & Harassment, Health and Safety, Privacy, and a Whistleblower Policy.

## Policy & Procedure Development

- We have conducted an annual review of Maben's Anti-Slavery Policy
- We have conducted an annual review of all other policies and procedures, including all reporting and grievance mechanisms

## Education & Training

- We have introduced employee training on the Anti-Slavery Policy
- Employees will be trained to complete risk assessment of subcontractors and suppliers

## Due Diligence

- We regularly review our major subcontract suppliers and assess supply chain risks
- We will ensure contractual terms with our suppliers align with our standards and values and minimise the risk of modern slavery in our supply chain

# Effectiveness

Our monitoring and assessment process is being developed, and the focus of this first reporting period has been to develop a framework to monitor the effectiveness of our actions in identifying and mitigating risks of modern slavery in our operations and supply chain.

We will continue to review our modern slavery processes and plan to measure our performance against several KPIs, including:

- Reviewing the risk assessment methodology;
- Monitoring the number of staff who have undertaken modern slavery training;
- Applying the risk methodology to our key suppliers on an annual basis



# Future Actions

## Policy & Procedure Development

- We will continue to review and update our policies and procedures to meet legislative requirements and updates, as well as operational requirements.

## Education & Training

- We will educate our employees on the risks of modern slavery in our supply chain and how to identify any risks within the supply chain of their projects.
- We will evaluate how we can further influence the knowledge and operations of our subcontractor base through training, questionnaires and assessments.

## Due Diligence

- Maben will conduct regular audits of the modern slavery risks within our supply chain, monitor progress, identify potential risks, and remediate them where required.
- Maben's third-party audits verify compliance of our quality, environmental, and workplace health and safety management systems with relevant international standards.

# Approval

This statement has been developed to comply with the requirements of the Australian Modern Slavery Act 2018. It has been approved by the Maben Group Pty Ltd. board and signed by the three company Directors.

Ben Pedersen  
Director

Damien Marasco  
Director

Craig Gathercole  
Director