



MODERN SLAVERY STATEMENT

FY 2019 - 2020

Kane Constructions Pty Ltd
Kane Constructions (QLD) Pty Ltd
arete Australia

Contents

Who we are3

Identifying the Risks of Modern Slavery4

Actions Taken to Assess and Address Risks.....5

 Improvements to Our Policies and Procedures5

 Education.....5

 Collaboration.....5

Measuring Effectiveness of Our Actions.....6

 Policies and Procedures.....7

 Awareness Training7

 Collaboration.....7

 Improved Due Diligence and Risk Assessments7

Consultation7



Key areas of action at Kane 2019-2020

- Introduction of Kane’s Modern Slavery Policy
- Established Kane’s Modern Slavery Working Group
- Development of grievance mechanisms to address any identified or suspected risks
- Collaboration with our top subcontractors to strengthen modern slavery education and awareness
- Widened the scope of right to work verifications to include all employees,, contractors and subcontractors
- Commenced training with key personnel on the implications associated with modern slavery risks

Who we are

Kane Constructions are a leading mid-tier, privately owned commercial construction company, active in all sectors of the industry. With over 500 employees, we operate throughout the east coast of Australia with offices in Melbourne, Sydney, Brisbane and Canberra.

The areas of construction expertise we operate in include commercial, healthcare, aged care & retirement living, heritage and restoration, hi-tech research and laboratories, retail, education (tertiary, primary and secondary), community, sports & leisure, hospitality, industrial and defence.

With operations across Australia and a supply chain that extends to Europe and Asia, we remain vigilant to the risk of slavery and human trafficking and recognises that in certain markets the number of workers that are trafficked, exploited and forced to work in the construction and manufacturing industries is rising.

The vast majority of our supply chain is based on materials and operations created and run within Australia, however, we are improving our methods to identify risks to work towards even greater transparency and responsibility. Through the modern slavery risk assessment process, Kane have identified products and/or materials originating from various countries, including France, Germany, Singapore, USA, Malaysia, Taiwan, China and Spain. Our supply chains also include services which contribute to its operations, including cleaning and security services across Kane sites and offices.



Kane Constructions Pty Ltd

arete Australia

ABN 49 007 354 396

Kane Constructions (QLD) Pty Ltd

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Identifying the Risks of Modern Slavery

Kane recognise that the construction industry is a high-risk sector due to large, diverse and complex supply chains. Kane understand the growing need to recognise potential modern slavery risks, and work towards greater transparency to eradicate human rights abuses.

As a first step to identifying modern slavery risks and building greater transparency within Kane's supply chains, we ran a risk assessment based on expenditure and product countries of origins.

The vast majority of our identified supply chain are based on operations which run and/or are created within Australia, however, Kane have identified the risk of modern slavery in some building products such as filtration equipment and light fittings sourced from China; the impacts COVID-19 has had globally with a high demand for medical supplies such as face masks and hand sanitiser; and risks with third-party labour hire due to reduced transparency in employment practices.

Construction Industry and Potential Factors Linked to Modern Slavery

Labour Risk

- Construction is known to have higher risk factors of long and multi-tiered supply chains which can result in a lack of visibility of employment practices from suppliers and subcontractors.
Services such as cleaning and security are identified as high risk modern slavery industries

Geographic Risk

- The Global Slavery Index identifies that sourcing supplies from countries such as China (light fixtures, office machine parts, telephones, rubber footwear), India (potentially used minerals, machinery and mechanical appliances) have an increased risk of modern slavery in supply chains.

Commodity Risks

- Components of building products which are linked to increased risk of modern slavery include cobalt, granite, rubber, cement, and copper.

COVID-19 Impacts

- High demand for frequent and wide-scale cleaning services across all sites could reduce visibility of recruitment practices in third-party labour hire
- Increased risk of labour exploitation to produce face masks and sanitisers at low prices and with time pressure

Despite the complexity of our large and diverse supply chains, Kane are committed to continually improving how we work to meet our moral and ethical obligation to combat modern slavery. We expect all of our subcontractors and suppliers to comply with all legislative obligations, and include questions and clauses related to identifying and minimising the risks of modern slavery.

Actions Taken to Assess and Address Risks

During the year of 2019-2020, Kane took the following steps to assess our risks and priorities to modern slavery and human trafficking:

Improvements to Our Policies and Procedures

- We have introduced a Modern Slavery Policy for the purpose of creating an integrated approach with organisations Kane work alongside to minimise the risks of modern slavery. This policy is made visible online.
- We have introduced grievance mechanisms for any modern slavery or human trafficking concerns within our Whistleblower Policy, which is publically available to all employees and third parties.
- We have increased scrutiny of labour hire regulatory compliance through widening the scope of right-to-work verifications to now include all employees, contractors and subcontractors.
- We have initiated a review of subcontractor due diligence processes to identify and prioritise potential risks, including introducing modern slavery within some key contracts.

Education

- We have established a Modern Slavery Working Group that meet on a regular basis to determine appropriate methods to minimise risks of modern slavery within our supply chains.
- We have commenced training with key personnel on the implications associated with modern slavery risks, including content from Supply Chain Sustainability School.
- We are developing further training including e-learning for all staff on recognising and remediating modern slavery risks if they are identified within our supply chain.

Collaboration

We understand that modern slavery may be a new concept to many of our subcontractors. Kane have worked closely to provide support every step of the way during this reporting period to ensure that we are working together to understand and establish best practice on how to reduce risks of modern slavery.

- We have developed and provided our key top suppliers (based on expenditure) information in the form of a Toolkit to educate their employees and suppliers on what modern slavery entails, what it could look like, and practical steps on how to tackle modern slavery within their supply chains.

- We conducted a webinar information session for our top suppliers to discuss modern slavery legislative requirements for reporting, and to determine proactive measures which can be taken in their operations and supply chains to reduce the risk of modern slavery and manage incidences where they occur.

Measurement and Evaluation			
	Performance Indicators	Completion	Target FY21
Policies and Procedures	Modern Slavery Policy Published	✓	✓
	Whistleblower Policy Published	✓	✓
	Modern Slavery Procedure Published	In progress	✓
Due Diligence	Post Tender Interview Questions	0	All new projects
	Modern Slavery Clauses in Contracts	2	All new projects (if required)
	Code of Conduct Questionnaire	7	30
	Right to Work Checks as part of PTIs	✓	✓
	Modern Slavery Strategy and Review Meetings	4	5
Training and Education	Webinars & Info Sessions	1	3
	Internal Staff Training Sessions	2	20
	Modern Slavery Guidebook Distribution	11	30



Looking Forward

Policies and Procedures

We continue to review and update our policies and procedures in accordance with legislative requirements and updates.

Post-Tender Interviews and Contracts

We will be introducing clauses relating to modern slavery within our post-tender interviews, which we can later measure effectiveness of. This will also increase the number of contracts with modern slavery clauses nationally.

Awareness Training

We are looking to further educate their employees on the risks of modern slavery with the implementation of e-learning courses and information packs on assessing and addressing the risks of modern slavery.

Collaboration

Collaboration and open communication is key to minimising the risk of modern slavery in our supply chain. Kane endeavour to continue involving and managing subcontractors and suppliers as 'one team' to draw on a broad pool of ideas and achieve positive outcomes.

Improved Due Diligence and Risk Assessments

Kane endeavour to conduct further internal audits and monitoring of modern slavery risks within our supply chain.

Consultation


Kane Constructions (QLD) Pty Ltd is a wholly owned subsidiary of Kane, run by the same board, using the same systems, policies and procedures.

The actions and taken to assess and address risks across Kane cover both Kane Constructions Pty Ltd and Kane Constructions (QLD) Pty Ltd.

This statement has been endorsed by the board of Kane Constructions.



Richard Frisina
Joint Managing Director



Tristan Forster
Joint Managing Director

KANE

