



# CAREY GROUP HOLDINGS PTY LTD MODERN SLAVERY STATEMENT

DECEMBER 2023





## CAREY COMMITMENT

We are committed to being socially responsible in all our operations and throughout our supply chain. We recognise the importance of human rights and oppose slavery in all its forms. It is fundamental to our core values of “Integrity” and “Respect” that all people in our business and associated with our business are treated fairly and with respect.

Our goal is to maintain a socially responsible and transparent supply chain, and we are committed to conducting business in an ethical and respectful manner.

Our statement for the Financial Year ending 30 June 2023 is made in accordance with the Australian Modern Slavery Act 2018.

## CAREY VISION AND VALUES

**carey**  
creating new horizons

**OUR VISION**  
To create new horizons for Indigenous People through business.

**OUR MISSION**  
Carey will grow and diversify to be the business of choice by delivering quality services to clients with an authenticity that fosters genuine opportunities for Indigenous Peoples.

[www.careygroup Holdings.com.au](http://www.careygroup Holdings.com.au)

**TEAMWORK**  
We collaborate to achieve quality outcomes

**INTEGRITY**  
Do what is right, honest and fair

**FAMILY**  
The safety, wellbeing and personal growth of our people is our foundation

**RESPECT**  
Respect each other, the environment, culture and country

**COURAGE**  
We challenge ourselves to achieve new horizons

## CAREY APPROACH

We recognise Modern Slavery can take many forms that may include:

- Forced labour.
- Debt bondage or bonded.
- Human trafficking.
- Descent-based slavery.
- Child slavery.
- Forced and early slavery.



We continually assess these risks within our supply chain and operations through:

**1. SUPPLIER ENGAGEMENT**

We actively engage with our suppliers to understand their approach to modern slavery risks and their remediation processes should any instance be identified in their supply chain.

**2. AWARENESS**

Through engagement with our leadership group, we have developed awareness of modern slavery risks and clearly identified channels to report any such concerns.

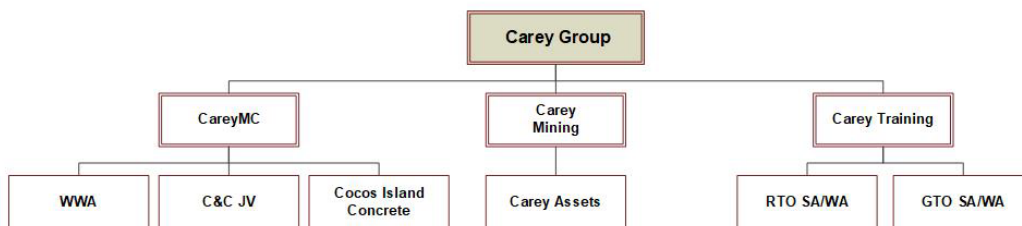
**3. SAFE WORKING CONDITIONS**

Our primary focus is a safe work environment for all our employees, subcontractors and any other personnel who interact with our operations.

**CAREY STRUCTURE**

Our combined statement is made in accordance with the Australian Modern Slavery Act 2018 and applies to all entities within the Carey Group.

Our corporate structure is outlined below, and this combined statement covers all named entities. For the purposes of reference across this statement, we will refer to the whole group, as Carey Group.



Carey Group provides civil, mining and training services to the resource, government and infrastructure sectors. We have been delivering projects to Tier 1 clients since our inception in 1995 and we work with Indigenous Traditional Landowners as supply chain and joint partners on some of our projects.

Our client operations we support are typically present in gold, iron ore, mineral sands, civil construction, marine and oil and gas sectors.

We are headquartered in Malaga, Western Australia and employ over 400 people across projects and training locations in Western Australia and South Australia.

**CAREY SUPPLY CHAIN**

Our supply chain spans across over 800 suppliers, all of whom are Australian entities, and consists of goods and services supplied for the purpose of supporting business operations across our core activities.

Over 85% of our supply chain in FY23 consisted of:

- Plant and equipment hire.



- External labour hire and subcontractors.
- Equipment parts, components, and spares.
- Supply of tyres and rims.
- Repair and maintenance services.
- Freight and heavy haulage.
- Fabrication services.
- Workshop consumables and tooling.
- IT equipment and consumables.
- Recruitment services.
- Oils and lubricants.
- Personal protective equipment

We recognise that there is increased risk of modern slavery occurring in the supply chain where supplier parts are sourced and fabricated outside of Australia.

We mitigate this risk through our general terms and conditions of supply which state that subcontractors and suppliers must act in a legal and ethical manner at all times.

Modern slavery compliance is also assessed through our supply chain prequalification process.

No breaches of the Australian Modern Slavery Act 2018 were identified in FY23 by our supply chain.

#### **CAREY OPERATIONS**

We believe that there is minimal risk of modern slavery in our direct work force due to our compliance with relevant employment laws, occupational health and safety laws and industrial instruments.

100% of our workforce resides within and is employed in operations within Australia.

Our Business Ethics Policy commits all employees and those we work with, to not use forced, compulsory or child labour. The Policy further commits us to uphold fundamental Human Rights by conducting ourselves and the business in accordance with relevant human rights laws and regulations.

Our Grievance Resolution Procedure allows, both direct work force and contractors, to bring workplace grievances to a resolution through a confidential and fair process.

No breaches of the Australian Modern Slavery Act 2018 were identified in FY23 throughout our direct operations.

#### **CAREY ACTIONS AND DUE DILIGENCE**

In FY23, we continued to assess modern slavery risk and compliance in our operations and supply chain through:

##### **1. REVIEW OF NEW VENDOR SUBMISSIONS**

All vendors are reviewed on a regular basis to assess modern slavery compliance within our supply chain management system.



## **2. IMPROVED AWARENESS**

Our leadership team have been educated on Australian Modern Slavery Act 2018 requirements through our online People and Culture training, which explains our Business Ethics Policy and Code of Conduct processes, specifically the potential risk of a breach and how to report these matters.

## **3. SYSTEMS AND REPORTING**

A review of our management systems was undertaken and deemed to be sufficient to ensure identification of breaches or instances of modern slavery in our operations and supply chain.

## **CAREY CONSULTATION**

We acknowledge our responsibility to ensure that relevant personnel and associated entities are consulted in the preparation of this statement.

## **CAREY FUTURE FOCUS**

We are committed to a continual improvement plan that assesses modern slavery risks and mitigates these risks to our business. Our objective is to eliminate these risks within our supply chain and to identify any breaches or non-compliance in a timely manner.

We plan to do this through:

### **1. ANNUAL ASSESSMENT**

Our supply chain management system will be used to conduct an annual assessment of all suppliers and subcontractors with respect to modern slavery compliance. Any breaches will be immediately investigated.

### **2. PROTOCOLS FOR BREACHES**

A clear guideline for escalation of identified breaches will be drafted, reviewed and implemented through our leadership team down.

### **3. POLICY REVIEW**

A review of the Business Ethics Policy and Grievance and Resolution Procedure will be undertaken.

## **SUBMISSION AND PUBLISHING**

This statement is made on behalf of the Carey Group for the financial year ending 30 June 2023 and it has been approved by our governing body, the Executive Leadership Team on 31/12/2023.

A handwritten signature in black ink, appearing to read "Moses Panashe", is positioned above the name and title of the signatory.

**Moses Panashe**  
Chief Executive Officer  
Carey Group Holdings Pty Ltd