



MODERN SLAVERY STATEMENT

FINANCIAL YEAR 2022 / 2023

Revision: A

Issue: July 2023

1 Company Details

Stephen Edwards Constructions Pty Ltd (SEC) is the Modern Slavery reporting entity.

Company details:

- ACN: 001 824 139
- ABN: 65 001 824 139
- Incorporation date: 1979
- Head Office: 140 Wicks Rd, Macquarie Park NSW
- Contact Details:
 - Ph: 02 9891 3099
 - Email: primary@stephenedwards.com.au
 - Website: www.stephenedwards.com.au
 - Modern Slavery Representative: Adrian Nolan

2 Structure, Operations & Supply Chains

Structure

SEC is an Australian, privately owned, family business with no parent company. It is therefore a 'single reporting entity'. There are four company Directors.

Operations

SEC is an established Australian building company specialising in the construction of education, health, commercial, infrastructure, aged care and government projects. We complete a range of commercial construction projects across metropolitan & regional New South Wales. Since the company's incorporation in 1979, SEC has completed over 600 construction projects. SEC employees approximately 110 staff. The company's operations include:

1. Construction
2. Design management
3. Cost planning

Supply Chains

SEC delivers our projects by engaging a wide range of subcontractors and suppliers to provide materials and labour. Our supply chain consists of these subcontractors and suppliers.

This supply chain is very varied and dynamic. The procurement and engagement of subcontractors and suppliers is dependent on project requirements. Products are often specified by clients and their designers, which means that elements of our supply chain are outside the control of SEC. Subcontractors and suppliers making up our supply chain are very varied in scale (i.e., local, regional and international businesses) and nature. They are selected based on project requirements. They also change from project to project to suit the specific need of that building project.

Generally - most Subcontractors are Australian Companies and local companies.

Suppliers provide products based on project requirements. Products and are sourced both locally and overseas. We promote the supply of Australian products from Australian suppliers where possible.

3 Assessment of Risk of Modern Slavery Practices

We have assessed SEC's risk of exposure to modern slavery practices to our operations we have identified the following:

TYPE OF MODERN SLAVERY RISK	RISK RATING
Direct Employment of SEC workforce There is no risk of Modern Slavery occurring in our direct operations i.e., in the direct employment of our staff due to our employment conditions.	Nil
Workers directly working on sites employed by subcontractors	Very Low
Workers in Australia who are not directly employed on or work sites, however engaged in the supply chain of products that are used on our projects	Very Low
Workers who are overseas who are not directly employed on or work sites, however engaged in the supply chain of products that are used on our projects	Medium

We believe that the highest risk is within our supply chains where imported goods, particularly those from South-East Asia, may use workers exposed to modern slavery practices. This is also the most difficult risk to control and manage.

4 Actions taken to address Modern Slavery Risks

We implement the following actions to address the risk of modern slavery;

Direct Employees

- All direct employees are employed on an individual basis in line with Australian Laws. This removes any risk of Modern Slavery in our direct workforce.

Subcontractors' employees and supply chains

- Modern Slavery requirements discussed at subcontract contract award
- Modern Slavery Provisions are included with Subcontracts
- Subcontractors must sign Statutory Declarations confirming compliance with Modern Slavery provisions for each progress claim (usually monthly). All other employment requirements are also checked including workers compensation compliance etc.
- Promote the engagement of the following types of subcontractors:
 - Local businesses with known workforces
 - Use known subcontractors with proven record of compliance
 - Preference for majority direct workforce rather than labour hire workers

Supply chain for products used on our projects

- Modern Slavery Provisions are included with Purchase Orders
- Promote the use of Australian products where possible
- Promote the use of 'established' companies where overseas products must be used where companies have Modern Slavery compliance systems in place.

If Modern Slavery practices are suspected to have occurred in our Subcontract workforce or supply chains, the following process will be implemented:

1. Suspend the Subcontract / Supply of Materials
2. Investigate the activity to confirm if there is Modern Slavery (as defined by legislation) occurring
3. Report Modern Slavery practices to appropriate authorities
4. Discontinue to use the offending Subcontractor or Supplier permanently, or if this is not reasonably practicable, suspend the use of the Subcontractor or Supplier until the Modern Slavery event / risk is resolved and sufficient measures are put in place by the organisation to prevent the re-occurrence of Modern Slavery.

5 Assessing the Effectiveness of Modern Slavery Compliance

SEC has nominated Adrian Kendal, to hold the responsibility of assessing Modern Slavery Compliance within our company. As part of this role Adrian will complete checks, from time to time, on the following processes:

- Modern Slavery requirements discussed at subcontract contract award – checked via POST TENDER CHECKLIST form
- Modern Slavery Provisions are included with Subcontracts
- Subcontractors must sign Statutory Declarations confirming compliance with Modern Slavery provisions for each progress claim

Adrian should provide outcomes of compliance checks to the Director(s) for review. If non-compliances are encountered, Adrian is to immediately notify a Director.

6 Consultation & Training

Consultation with SEC Employees:

- Employees have been trained on what Modern Slavery is and how SEC will address the risks of Modern Slavery. Training Records are kept as confirmation.
 - Consultation has been sought as part of this training.
- Annual refresher training will be provided to ensure that staff are kept informed and up to date on Modern Slavery requirements.
- New employees will be trained on how SEC manages Modern Slavery risks and compliance as appropriate.

SEC does not own or control other entities. We do however, engage with a wide range of Subcontractors and Suppliers. The following is consultation with Suppliers & Subcontractors:

- Modern Slavery requirements discussed at subcontract / purchase order award
 - SEC has included Modern Slavery compliance requirements in the POST TENDER CHECKLIST form. This form is used to ensure that Modern Slavery is addressed as part of our procurement process.
- Modern Slavery Provisions are included with Subcontracts

Other training and consultation:

- Norbert Weber, Systems Manager, has undertaken training sessions and consultation with external providers who have provided guidance on Modern Slavery and our compliance requirements.
- Mathew Edwards, Director, has attended external workshops on Modern Slavery.
- We have had consultation with some key clients on Modern Slavery and how we achieve compliance e.g., Catholic Education Office and Opal Healthcare.

7 Management Statement

Modern slavery is a global phenomenon which includes a range of activities that seriously deprive individual liberty and freedoms. These activities extend beyond mere unfair labour practices and unfair pay, as slavery violates fundamental human rights through coercion, threats, deception and physical control.

Modern slavery practices present a threat to fundamental human rights such as the right to dignity of human person and personal liberty.

SEC is committed to complying with the *Modern Slavery Act 2018 (Cth)*.

We also are committed to ethical business practices that will contribute to the stamping out of modern slavery in all its forms by implementing a zero-tolerance system towards modern slavery through our supply chains.

SEC's direct suppliers and subcontractors are usually based locally, with the remainder normally still being Australian operated businesses. As such, SEC's exposure to risk within our supply chain is regarded as minimal.

At SEC, we have made clear to our Employees, Subcontractors and Suppliers what the company's expectations and commitment are towards eliminating modern slavery in our operations and supply chain.

This statement has been prepared on behalf of SEC in accordance with the *Modern Slavery Act 2018 (Cth)*.

This Modern Slavery Statement has been approved by the Directors of Stephen Edwards Constructions Pty Ltd and signed by;



Mathew Edwards
Director