

Vaughan Civil Pty Ltd Modern Slavery Statement 2023/2024

This is Vaughan Civil Pty Ltd statement pursuant to the Modern Slavery Act 2018 following Vaughan Civil's review of its supply chains and operations in compliance with reporting obligations under the Act for the financial year ending 30 June 2024. As part of this Statement, Vaughan Civil will address the seven mandatory reporting criteria required by the Modern Slavery Act 2018 (Cth) as follows:

1. Identify the reporting entity
2. Describe the structure, operations and supply chains
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls
4. Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address these risks, including due diligence and remediation processes
5. Describe how the reporting entity assess the effectiveness of these actions
6. Describe the process of consultation with any entities the reporting entity owns or controls
7. Any other relevant information

1. REPORTING ENTITY

This Statement is a statement made by Vaughan Civil Pty Ltd and has been prepared and submitted under section 13 of the Modern Slavery Act 2018 (Cth) by Vaughan Civil Pty Ltd as a single reporting entity. This Statement will detail the strategies in place within Vaughan Civil and its subsidiaries to identify and prevent any potential modern slavery activities within its operation and supply chain.

2. STRUCTURE, OPERATIONS & SUPPLY CHAIN

STRUCTURE

Vaughan Civil Pty Ltd (Vaughan Civil, ABN 50 152 638 447) is an Australian Private Company domiciled in Australia with its registered office in New South Wales. Vaughan Civil is 100% Australian-owned, was established in 2011 and is today one of Australia's leading privately owned civil construction companies.

OPERATIONS

With over 12 years' experience in providing a diverse range of civil and building construction services to government and private clients. Even with its operations limited to Australia, Vaughan Civil understands the imposed risks of modern slavery practices that can arise in the construction industry through its supply chain and local operations with exploited workforces. Vaughan Civil is predominately engaged in the design and construction of utility and infrastructure projects. All executed head works contracts are with clients who are domiciled and based in Australia.

SUPPLY CHAIN

Vaughan Civil's supply chain plays an integral role in our success. The Vaughan Civil Way sets out our company values that define how we do business - both internally and externally - and are vital towards achieving our vision. One of our key values is Relationships - we build lasting relationships through trust and performance. We work closely with our supply chain to ensure they comply with all applicable legislative and regulatory requirements, as well as actively sharing our Vaughan Civil values. Vaughan Civil's supply chain consists predominately of Australian entities. This supports the 'buy local' policies and commitments our clients often require, as well as providing Vaughan Civil with greater oversight and ability to manage any risks associated with the performance of our supply chain. Vaughan Civil has undertaken an extensive due diligence and auditing process to ensure their full compliance with all relevant legal

Vaughan Civil Pty Ltd Modern Slavery Statement 2023/2024

obligations including modern slavery requirements. Further information on this is provided below. Several Vaughan Civil vendors do source components of their works from overseas entities at some point in the supply chain. The nature of the work Vaughan Civil performs can be complex and technical, which results in varied supply chains sourcing limited or niche products or services.

3. RISKS OF MODERN SLAVERY IN VAUGHAN CIVIL'S OPERATIONS AND SUPPLY CHAIN

Vaughan Civil has assessed our operations and supply chains to identify any risk factors for modern slavery practices to be inadvertently incorporated into our business. Our review identified the following key risk factors which may be susceptible to these practices:

NATURE OF WORKFORCE

The construction industry can be at risk of engaging vulnerable populations and workforces due to the nature of the ebbs and flows of project work which can include several different trades and contractors working concurrently. Securing contracts in the industry is usually by way of competitive market tenders.

HIGH RISK NATURE OF WORKS

Construction industry projects require a diverse range of intersecting subcontractors to be successful. This includes categories which can be inherently high risk - such as labour hire personnel. By the nature of a competitive tendering process contracts may be awarded based on the lowest price which may ultimately cascade to lower rates of pay and poorer conditions of pay for the incumbent employees of these subcontractors. Vaughan Civil's robust vendor assessment and procurement process seeks to identify and mitigate these practices by undertaking a broader risk and rating assessment which allocates a weighting system against categories including health and safety systems, sustainability measures and industrial relations policies.

LONG SUPPLY CHAINS

Our projects are technical and complex in nature, requiring equipment and materials which may need to be sourced from suppliers who in turn are sourcing individual components or raw materials from vendors in locations where modern slavery practices have been known to exist. Although all our operations are undertaken in Australia with Australian suppliers, it is important that Vaughan Civil continues to develop our due diligence process in identifying and mitigating these risks through the procurement and contract management cycles, as well as flowing these processes and requirements down our supply chains.

4. ACTIONS TAKEN BY VAUGHAN CIVIL TO ASSESS AND ADDRESS THE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

Vaughan Civil promotes a culture of continuous improvement in our business and we have applied this same thinking to combating the risk of modern slavery arising within our operations and supply chain. We have reviewed our policies, processes, and actions from an end-to-end perspective, to ensure we are capturing every opportunity for compliance.

Vaughan Civil Pty Ltd Modern Slavery Statement 2023/2024

PROCUREMENT

Vaughan Civil has an established procurement procedure for external services, materials, and plant. All subcontractors and suppliers are subject to the staged pre-qualification, evaluation and assessment prior to any approval, engagement, and contract execution.

The following components of Vaughan Civil's procurement process demonstrate steps currently taken by Vaughan Civil to address and eliminate modern slavery in its business and supply chain through the initial procurement stages:

1. Identification of any hazards which may be introduced with the purchase of goods and services and labour hire arrangements and conducting a risk assessment to identify controls to be implemented to eliminate or reduce the risk to as low as reasonably practicable.
2. Vaughan Civil's subcontracts for Major and Minor Supplies and Services require the supplier to warrant it has not engaged in any collusive or anti-competitive behaviour in connection with the tender or the agreement for the supply. Additionally, it contains a modern slavery clause whereby the supplier warrants to comply with applicable modern slavery laws, take all reasonable and necessary steps to identify, investigate and eliminate modern slavery in its operations and supply chains, and provide all information reasonably necessary as requested by Vaughan Civil regarding the supplier's operations and supply chains to enable Vaughan Civil to comply with its obligations under Modern Slavery Laws.
3. Vaughan Civil's subcontractors and supplier management procedure sets out the process for Vaughan Civil's management of subcontractors and suppliers to ensure externally provided processes, products and services conform to requirements in accordance with legislation, client and Vaughan Civil standards including Vaughan Civil policies and procedures.
4. Vaughan Civil vendor pre-contact assessment for evaluation of pre-qualified subcontractors and suppliers includes an extensive checklist to be completed by subcontractors and suppliers seeking information on sustainability and initiatives on social and ethical responsibilities and diversity programs. The tender process for subcontractors and suppliers also requires vendors to complete Vaughan Civil's modern slavery audit questionnaire as part of its deliverables for all requests for tenders and quotations.

Vaughan Civil subcontractor and supplier selection process requires adherence to Vaughan Civil's values, policies, and procedures. Vaughan Civil will work with subcontractors and suppliers who commit to operating to the same standards as Vaughan Civil applies including mandatory modern slavery clauses into all supply chain contracts.

The products and services supplied by Vaughan Civil's subcontractors and suppliers have been primarily sourced in Australia.

POLICIES AND GOVERNANCE

Vaughan Civil has an accredited Integrated Management System (IMS) which assists the organisation to manage our operations in compliance with legislation, our policies, procedures, and subordinate IMS documentation Group policies relevant to modern slavery include the Vaughan Civil Workplace Discrimination Policy, Sustainability Policy, Code of Conduct and Whistleblower Procedure. Vaughan Civil has an integrated governance process in place to oversee the company's compliance with legislation and our IMS, including the Modern Slavery laws and the auditing of its suppliers and subcontractors.

Senior Management meet weekly to discuss key performance information, including compliance to legal and other requirements, IMS and business risk and opportunities. Each Business Unit meet weekly and report any High or

Vaughan Civil Pty Ltd Modern Slavery Statement 2023/2024

Extreme business risks into Senior Management Meetings. Each Business Unit has a monthly meeting with Management representation to go through Low and Medium risks that they are managing at the Business Unit level. Our governance process requires the verification of evidence, and internal and external third-party audits to assess compliance to Integrated Management System

CULTURE – THE VAUGHAN CIVIL WAY

Vaughan Civil has the vision to be ‘the best people to work with’. The Vaughan Civil Way Values define how business is conducted internally and externally and sets the foundation on which the business operates and succeeds. These values include safety and creating an environment where people speak up on safety concerns. Vaughan Civil also values relationships which includes leading by example and never damaging the brand. This culture is demonstrated in the implementation of policies and procedures such as the Sustainability Policy, Code of Conduct and Whistle-blower Procedure, which are applicable to businesses within their supply chain.

WORKPLACE DISCRIMINATION POLICY

Vaughan Civil is committed to creating a workplace environment for its employees, and persons who work on behalf of Vaughan Civil, supporting the vision to be ‘the best people to work with’ and free from unlawful discrimination. This policy includes wording ‘Vaughan Civil does not employ forced, bonded or child labour’ and managers must act on any matter brought to their attention in accordance with this Policy.

SUSTAINABILITY POLICY

Vaughan Civil is committed to a culture of sustainability and manages its operations to minimise environmental and social impacts while integrating sustainability principles and practices into the business, the management of our projects and the materials procured. Sustainable objectives and targets are established for our projects and Vaughan Civil facilitates the sharing of ideas, knowledge, and innovation. Vaughan Civil implements risk and hazard management principles to maintain the health and safety of people and minimise any disruption on our projects, the community and environment.

CODE OF CONDUCT

Vaughan Civil’s Code of Conduct sets out conduct expectations and applies to Vaughan Civil’s employees, subcontractors, partners, and consultants. Under this Code of Conduct, all subcontractors and suppliers are expected to act consistently with fundamental Vaughan Civil values, ethical behaviour, respect for others and accountability and transparency in their business conduct. This code provides protections against conflicts of interests and bribes in Vaughan Civil’s business and supply chain. Subcontractors and suppliers are required to avoid conflicts of interest.

WHISTLEBLOWER PROCEDURE

Vaughan Civil’s Whistle-blower procedure which includes a confidential and anonymous reporting applies in respect of its business operations and supply chain. Vaughan Civil is committed to ethical practices across all areas of our business and encourages reporting to an independent provider of any information regarding misconduct, the existence of an improper state of affairs, illegal activities, unethical behaviour, breaches of legislation, behaviour which is oppressive, discriminatory or grossly negligent, unsafe work practices, serious risks to public health, safety or the environment or any conduct which poses a serious risk to health and safety of any person at the workplace.

Vaughan Civil Pty Ltd Modern Slavery Statement 2023/2024

5. MEASURE OF EFFECTIVENESS OF ACTIONS

Vaughan Civil has established a range of actions to enhance our abilities to identify, mitigate and prevent modern slavery risks from our business, and we have implemented the following key performance indicators which we will continue to develop as we review their effectiveness through these early stages:

1. Continue to undertake a yearly audit of the top ten high value (by spend) as well as other high-risk vendors (including any vendors which are located overseas or which we believe may source goods or services from high-risk geographical locations). All new suppliers and subcontractors are vetted during the initial evaluation process and those which become a top ten vendor by value will be audited annually.
2. Include the Modern Slavery Questionnaire as part of our standard due diligence process during procurement for all projects to assess all vendors pricing works for Vaughan Civil projects.
3. Review of relevant policies and procedures by the Leadership Team to ensure that adequate controls are in place to appropriately manage modern slavery risks through Vaughan Civil's workflows.
4. Continue to monitor the whistle-blower hotline and address any reports or grievances directly and efficiently. Vaughan Civil is committed to continually reviewing and improving these metrics over the following reporting periods as we further develop and assess our actions.

6. PROCESS OF CONSULTATION

Vaughan Civil is a single reporting entity in accordance with the requirements of the Act. Vaughan Civil's Leadership Team is responsible for the operations of Vaughan Civil Group and any related subsidiaries and ensure that all policies and procedures conform to legislative and regulatory requirements and are in accordance with the Vaughan Civil values. The Leadership Team, through its delegated Business Unit leaders, have actively ensured all project and support staff understand the importance and implications of this Act on our business via these policies and procedures as standard operating practices. Project and support teams have cascaded these requirements onto our third-party vendors through our project documentation and via publication of our processes, policies, and our Modern Slavery Statement. It is on this basis that Vaughan Civil's Leadership Team have reviewed and approved this statement prior to its submission.

7. MOVING FORWARD

Vaughan Civil has implemented processes and practices within its business including its extensive staged procurement process and contractual terms to minimise any potential risk of modern slavery within their own and their first-tier suppliers and subcontractors. Future to enhance the measures Vaughan Civil has already undertaken, as set out above in this statement, supports commitment to effectively identify and address any potential risk exposure of modern slavery in the business and supply chain as part of the ongoing modern slavery roadmap.

Vaughan Civil Pty Ltd Modern Slavery Statement 2023/2024

This statement has been approved by the principal governing body, Joe Vaughan who is the Sole Director for the reporting entity Vaughan Civil Pty Ltd. See Annexure 1.

Dated 06/05/2024

Joe Vaughan

Managing Director

A handwritten signature in black ink, appearing to read "Joe Vaughan", enclosed within a thin black rectangular border. Below the signature is a horizontal line that spans the width of the page.

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of

Vaughan Civil Pty Ltd

as defined by the *Modern Slavery Act 2018 (Cth)*¹ ("the Act") on 06/05/2024

Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of

Vaughan Civil Pty Ltd

as defined by the Act²:



Joe Vaughan

Sole Director - Vaughan Civil Pty Ltd

Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	1
b) Describe the reporting entity's structure, operations and supply chains.	1-2
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	2
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	2-4
e) Describe how the reporting entity assesses the effectiveness of these actions.	5
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	5
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	

* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

** You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

- Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.
- Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001*—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.