

2021 Modern Slavery Statement

Qanstruct (Aust) Pty. Ltd. (Qanstruct) opposes slavery in all its forms. This Modern Slavery Statement is made in accordance with the Australian Modern Slavery Act 2018 (Cth) (Modern Slavery Act). It applies to and describes the steps taken by Qanstruct, during the financial year ending 30 June 2021 to minimise the risk of modern slavery in its business.

Qanstruct (Aust) Pty. Ltd acknowledges the existence of modern slavery, which includes human trafficking in persons, slavery, servitude, forced marriage, forced labour debt bondage, deceptive recruiting for labour and services, and the worst form of child labour. We are committed to protecting the rights of all people and to develop practices that minimise the impact of modern slavery through our supply chain.

Qanstruct's structure, operations and supply chain

Qanstruct (Aust) Pty. Ltd (ACN 070 953 874) acts in its capacity as The Trustee for Qanstruct (Aust) Unit Trust (ABN 88 765 907 859). Qanstruct is a privately owned construction company established in Melbourne and today operates in Victoria, New South Wales, South Australia, and Tasmania, specialising in the design and construction of industrial and commercial facilities.

Over the past 30 years, we have built a reputation for delivering award winning projects with unrivalled integrity and service.

Qanstruct has offices in both Victoria (500 Burwood Road, Hawthorn, 3122) and New South Wales (Suite 1302 / 68 York Street, Sydney, 2000).

Qanstruct directly employs approximately 150 people between Victoria and New South Wales. All Qanstruct's employees are employed directly under employment contracts or under enterprise bargaining agreements (the latter of which can be found at <https://www.fwc.gov.au/agreements-awards/enterprise-agreements>).

Qanstruct deals with subcontractor businesses to undertake worksite activities. The vast majority of these businesses are small to medium enterprises who are not required to have accountability under the act. Although these businesses do not require accountability under the act, Qanstruct recognises there is a potential modern slavery risk. Enquires are made during the tender process to identify and assess this risk.

Qanstruct's supply chain predominately comprises first level subcontractors and suppliers who are registered businesses in Australia. Their goods are generally sourced through local Australian distributors.

Risks of modern slavery in Qanstruct's operations, supply chains and entities

The integrity of Qanstruct is paramount to its operations and this is reflected in our dealings with clients, consultants, subcontractors, and suppliers and endeavors to engage subcontractors and suppliers that share similar values.

Qanstruct has identified that there are potential risks of modern slavery within its supply chain. The area that has been identified as a high risk in the supply chain is labour hire companies.

In recognition of this, Qanstruct has established an audit tool, (as discussed further below), as part of its selection process for the engagement of subcontractors and suppliers.

Qanstruct does not own or control any other entities.

Actions taken by Qanstruct

Qanstruct's audit tool, the Due Diligence Self-Assessment Questionnaire, is a self-assessment undertaken by each of Qanstruct's subcontractor and supplier. Those responses are then provided to Qanstruct to help it identify the subcontractors and suppliers who are at the highest risk of modern slavery. Where an organisation is identified as a high risk, further discussion and investigation is to be undertaken with that subcontractor/supplier to assist them in recognising the risk and then implementing procedures to remove it from their supply chain.

Qanstruct provides a safe working environment for all its employees in accordance with applicable government legislation. Qanstruct, through its inclusive culture provides an environment where all people can thrive regardless of their gender, race, religion, cultural background, and sexual orientation. Qanstruct has the following things in place to safeguard this environment including:

- Health and safety compliant to AS/NZS 4801
- OFSC as accredited by Federal Safety Commissioner
- Modern Slavery Policy
- Whistleblower Policy
- Privacy Policy

All Qanstruct employees are paid in accordance with relevant awards and receive all applicable entitlements.

Qanstruct identifies that engagement with its subcontractors and suppliers in the first instance is the most effective way to identify and action instances of modern slavery in its supply chain. Qanstruct addresses this by:

- Providing online training for Qanstruct employees to identify potential risk of modern slavery.
- Issuing of the Due Diligence Self-Assessment Questionnaire to subcontractors and suppliers prior to the awarding of contracts.
- Assessing responses in consideration of awarding contracts.
- Promoting Qanstruct's Modern Slavery Policy in the onsite induction process.
- Reviewing and updating its policies on an ongoing basis.

Qanstruct's contractual arrangements require subcontractors and suppliers to comply with the Modern Slavery Act and Qanstruct's Modern Slavery Policy. Through the execution of these agreements the subcontractor and suppliers confirm their commitment to comply with the Modern Slavery Act.

Assessing Effectiveness

Qanstruct's 2020 Modern Slavery Statement identified several objectives it sought to complete. Through the progression to FY2021, Qanstruct completed the following objectives:

- Implement training for staff to understand what modern slavery is, how it is identified and the mechanisms for reporting.
- Developed a video training tool for employees to understand what modern slavery is.
- Engaged with subcontractors and suppliers to assess the impact and effectiveness of Qanstruct's Modern Slavery Policy.
- Reviewed and updated accordingly Qanstruct's Due Diligence Self-Assessment Questionnaire.
- Implemented contractual provisions for compliance with the Modern Slavery Act.

- Incorporated awareness of Qanstruct’s Modern Slavery Policy in onsite induction processes.
- Provided annual Modern Slavery Statement.

Together these activities improved Qanstruct’s understanding of its obligations under the Modern Slavery Act and allowed it to put in place a system to identify and manage risks of modern slavery in its supply chain and operations.

Qanstruct is committed to continuing to assess the effectiveness of these actions and its future actions, which are set out in “Continual Development 2021-2022” below.

Consultation with other entities

As stated, above, Qanstruct does not own or control any other entities and therefore no consultation with any other entity was required.

Continual Development 2021-2022

Qanstruct opposes modern slavery in all forms and is committed to improving its practices in its fight against modern slavery. Over the next financial year, Qanstruct will continue to engage with its supply chain to understand and address the issue of modern slavery in the workplace.

In the FY2022 Qanstruct aims to:

- Conduct its annual review of Qanstruct’s Modern Slavery Policy.
- Provide ongoing training for staff to understand what modern slavery is, how it is identified and the mechanisms for reporting.
- Introduce an electronic / online due diligence self-assessment questionnaire.
- Continue to educate and engage with subcontractors and suppliers in relation to Modern Slavery.
- Undertake regular subcontractor and supplier audits to ensure compliance with the Modern Slavery Act.
- Engage with subcontractors and suppliers to assess the impact and effectiveness of Qanstruct’s Modern Slavery Policy.
- Annually review and update Qanstruct’s Due Diligence Self-Assessment Questionnaire.
- Review policy implementation.
- Review and update Qanstruct’s Modern Slavery Policy to reflect any changes in legislation.

Approval

Qanstruct is pleased to publish its 2021 Modern Slavery Statement and commits to continuing to track and publicly report on its progress.

This modern slavery statement was approved by the board of Qanstruct on 30 March 2022.



Charlie Rico

Director

31 March 2022