

December 2022 – FY2022
Modern Slavery Statement



Introduction

A message from our Chief Executive Officer



The Leed Group of companies is committed to working with our clients to deliver sustainable infrastructure that enriches communities and creates a better tomorrow.

To achieve this goal, we are dedicated to the highest standards of business ethics, and to addressing human rights abuses and the risks of modern slavery in our business and supply chains.

This document, our second Modern Slavery Statement, applies to the 2022 Financial Year and addresses our important obligations under the Australian *Modern Slavery Act 2018* (Cth). It describes the actions we have taken so far to address modern slavery risks and outlines the procedures we have in place. It also summarises our performance over the last year and sets out our plans over the next 12 months to improve our processes and continue to contribute to driving change within our industry.



Craig Laslett

Chief Executive Officer
Leed Group of Companies

Acknowledgement of Country

The Leed Group acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to the land, waters and community. We pay our respects to them and their cultures; and to Elders past, present and emerging.

We commit to continued listening and learning from First Nations voices and to working in partnership to create better experiences together for a better tomorrow.

What is modern slavery?

Modern slavery is an umbrella term that includes forced labour, human trafficking, debt bondage, forced or servile marriage, and the sale and exploitation of children.

What these concepts have in common is that the victims are in situations of exploitation which they cannot refuse or leave because of threats, violence, coercion, abuse of power, or deception.

The *Global Estimates of Modern Slavery* report published in September 2022 by the International Labour Organization (ILO), Walk Free, and the International Organization for Migration found that:

- modern slavery affects every region and country of the world
- in 2021 an estimated 49.6 million people were living in modern slavery on any given day including 27.6 million in forced labour and 22 million in forced marriages
- of those in forced labour, 11.8 million were women, 3.3 million were children and 3.9 million were in state-imposed forced labour
- most forced labour (86%) occurs in the private economy, with the principle industries being manufacturing, construction, agriculture (excluding fishing), services and domestic work
- over 50% of victims live in the Asia-Pacific region, a common source for many Australian supply chains
- The Global Slavery Index 2018 found that there were approximately 15,000 people considered to be living in modern slavery within Australia.

Criteria 1 and 2

Reporting entities

The reporting entities

This Modern Slavery Statement is made on behalf of the Leed Group of Companies in the Australian *Modern Slavery Act 2018* (Cth).

The statement applies to all the entities which are members of the Leed Group, namely:

- Leed Engineering and Construction Pty Ltd
- Leed Plant Pty Ltd
- Leed Holding Pty Ltd
- LGI Holdings Pty Ltd
- AC Rental Pty Ltd
- NWIC Pty Ltd.

Operations

Leed is an award-winning, privately-owned group of engineering and construction companies delivering key infrastructure projects and recognised for our particular expertise in the water sector. Founded in South Australia in 2001, we grew rapidly to become a national civil infrastructure contractor, delivering projects throughout metropolitan, regional and remote areas of Australia.

Our project growth into other states led to us opening offices in Bendigo in 2007, Melbourne in 2009 and Cooma in 2020. Leed now has over 180 staff and an extensive fleet of plant and equipment that allow us to 'self-perform' on the majority of our projects.

We have an excellent reputation for delivering projects on time and working in a collaborative way with clients, stakeholders and the wider community. Our experience, capability, financial stability, proven team and outstanding track record make Leed an ideal partner for complex infrastructure projects.

Criteria 1 and 2 (continued)

Supply chain

During the financial year ending 30 June 2022, Leed procured a range of goods and services including:

- professional services, specialist subcontractors and trades
- construction equipment and machinery
- raw construction materials including pipes, valves, fittings, pre-cast concrete structures, asphalt, fill, etc.
- mobile fleet of heavy equipment and vehicles, including parts
- personal protective equipment and clothing
- cleaning and security services
- mechanical and electrical equipment
- office equipment and stationery
- energy and utilities
- information technology equipment and services
- labour hire
- fuel
- accommodation
- food and beverages.

Founded
2001

4
Offices

180+
Staff

1000+
Suppliers

Criterion 3

Risks

Operational risk

We recognise that by virtue of our direct employment of many workers, Leed may cause, contribute to or be directly linked to modern slavery risks. However, we believe the risk of modern slavery in our workforce is low due to the strict regulations and employment laws with which we are required to comply, and our highly developed management systems.

Supply chain risk

Leed only delivers projects within Australia. We have a strong emphasis on the engagement of local small to medium enterprises and the use of products and supplies that are locally manufactured or purchased through local suppliers who comply with all required legislation and regulations. This minimises the supply chain risks of modern slavery as well as maximising investment in to the local economy.

As the majority of Leed's direct suppliers are based in Australia, a low risk jurisdiction for modern slavery, we believe that the risk of modern slavery in our supply chain is low, but we acknowledge that risks may exist in the second and subsequent tiers of our supply chain.

Sector risks

Leed recognises that certain industries and suppliers within Australia have a higher risk of modern slavery in their supply chains. Examples include:

- food services
- cleaning services
- medical, PPE and workwear supply
- IT and telecommunications equipment
- stationery supply
- casual labour hire.

These areas represent a relatively small proportion of Leed's overall operations.

Criterion 4

Mitigating risks

Leed manages modern slavery and human trafficking risks in our supply chain by:

- recognising our modern slavery commitments and obligations at a corporate policy level
- ensuring that all employees have a written contract of employment that explains our employees' rights and entitlements at law
- identifying and working with companies that are known to us and that have standards that are aligned with our own
- using subcontractor declarations to ensure alignment with subcontractors and identify potential risks
- managing subcontractors and suppliers in accordance with our highly developed, accredited management systems
- establishing clear expectations with our supply chain
- conducting due diligence reviews of suppliers
- incorporating terms and conditions relating to modern slavery in awarded contracts. Our contracts specifically require our suppliers to act in accordance with all relevant legislation and regulations
- conducting reviews of suppliers during performance to identify potential issues.

COVID-19 considerations

We recognise that the COVID-19 pandemic has heightened the potential exposure to modern slavery risks through restricting supply chain options, increasing timeframes and making due diligence and supplier assessment more difficult.

Leed's managed approach to COVID-19 considers procurement and supply chain issues including modern slavery and is subject to continuous improvement in order to mitigate the impacts of the pandemic on our ability to meet our modern slavery commitments.

Planned initiatives

Leed will:

- update its suite of Corporate Policies to better address modern slavery, outlining Leed's commitment to preventing, identifying and reporting modern slavery risks within our operations and supply chains
- revise existing subcontractor agreements/contracts to expand upon our expectations with regard to modern slavery
- undertake modern slavery training for all employees to assist in identifying practices which may constitute modern slavery, manage risks and ensure compliance.

STATUS EOFY22

= ONGOING

✓ COMPLETE
= ONGOING

▶ UNDERWAY

○ INVESTIGATING

Criterion 5

Assessing effectiveness

We recognise that we are at an early stage of our efforts to address modern slavery across our business and supply chains and are still developing our systems and processes to assess and mitigate modern slavery risk.

Over the next 12 months we will continue to extend and improve our existing accredited systems to better address modern slavery and to assess the effectiveness of our approach. This will include:

STATUS EOFY22

UNDERWAY ▶

- reviewing and revising our Code of Conduct to clarify our standards for our suppliers in relation to modern slavery, human rights, sustainability and other relevant issues
- updating our Whistleblower Policy and its associated reporting mechanisms to allow anonymous reporting of concerns about Modern Slavery and human rights
- a review of project management templates to ensure consistency with Leed's corporate policy updates addressing modern slavery

ONGOING =

- improving our supplier engagement processes and contracts

PLANNED ■

- leveraging our existing internal audit processes to also examine operational and supply chain modern slavery risks
- the establishment of a Modern Slavery Risk Register

INVESTIGATING ⦿

- assessing the possibility of establishing Key Performance Indicators for modern slavery reporting.

Other planned initiatives to ensure the effectiveness of our actions include:

ONGOING =

- regular, ongoing reporting to the Leed Board on modern slavery risks and compliance.
- a survey of Leed's suppliers to identify potential risks of modern slavery and regulatory non-compliance.

PLANNED ■

- project self-assessments.
- forming a Modern Slavery Working Group to coordinate the identified initiatives, regularly report on progress to Leed's Executive Management Team and Board and manage the annual updates to our Modern Slavery Statement.

Criteria 6 and 7

Consultation/Other information

Consultation

This Modern Slavery Statement was developed in consultation with each of the reporting entities listed in Criteria 1 – Reporting entities.

All relevant areas of our businesses have been made aware of our commitments and planned actions to combat modern slavery in all areas of our operations and supply chain. This communications process will be supported by specific training and regular communications.

Approval of Statement

This Modern Slavery Statement was approved by Leed's Board of Directors on 14 December 2022, in accordance with the requirements of the *Modern Slavery Act 2018* (Cth).



Andrew Millar
Board Chair
Leed Group of Companies

“*Leed is dedicated to the highest standards of business ethics, and to addressing human rights abuses and the risks of modern slavery in our business and supply chains.*”

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New South Wales

3 Sharp Street
Cooma NSW 2630
T: 0408 166 724

South Australia

95 King William Street
Kent Town SA 5067
T: 08 8132 1044

Victoria

Level 3, 8 Treadwell Road
Essendon North VIC 3041
T: 03 9374 3311

76 Collins Street,
Kangaroo Flat VIC 3555
T: 03 5447 0511

www.leed.net.au

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