

north

BUILDING WITH TRUST®

MODERN SLAVERY REPORT

FINANCIAL YEAR 2023-2024



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MANAGEMENT STATEMENT



At North, respect goes beyond an acknowledgement and appreciation of individuals' uniqueness but also includes honouring all fundamental human rights associated with this obligation.

The North core values of trust, respect, relational, excellence and fun are a bedrock and fabric of our organizational culture.

We acknowledge the complexity around modern slavery practices and the threat this poses to fundamental human rights such as the right to dignity of human person and personal liberty.

Consequently, we have made clear to our people, clients, and suppliers what the company's expectations and commitment are towards eliminating modern slavery in our operations and supply chain.

This statement has highlighted potential areas in which North could possibly contribute to or be directly linked to modern slavery through its constructions and supply chain.

Although there has not been any instance of modern slavery practices recorded in our direct pool of suppliers and subcontract workforce, the business has identified six (6) areas of potential threats to violation of human rights that could potentially abet modern slavery of our people, our clients, and our supply chain.

We have institutionalized systems that constantly evolve to mitigate the ever-changing dynamics of modern slavery acts in all its forms. As these changes occur, we will consistently recalibrate and improve our system to identify and combat the risk of modern slavery practices in our operations and supply chain.

This statement has been prepared on behalf of North Construction & Building Pty Ltd in accordance with the Modern Slavery Act 2018. Consultation has been conducted through our workforce, including our Senior Management Team and has been approved by the Directors of North Construction & Building.

Matthew Cook
Managing Director
North Construction & Building Pty Ltd

NORTH, YOUR TRUSTED BUILDING PARTNER®

North Construction and Building Pty Ltd are a privately owned company with a Head Office in Tuggerah NSW and working across Regional New South Wales and Southeast Queensland. North are proud to have a 37+ year reputation for strong relationships with local contractors and suppliers who have supported us through consistent growth to become a medium-sized business with approximately 125 directly employed staff.

Over 96% of North’s direct suppliers and contractors are also based within this same geographical boundary, with the remainder still being Australian operated businesses. As such, North’s exposure to risk within our supply chain is regarded as minimal.

TRUSTED REGIONAL BUILDING PARTNER.

As a trusted building partner, North plays a significant role in the regional construction landscape. Our business has operated successfully on the Central Coast, NSW for more than 34 years and, over those years, has grown to work more broadly in the Hunter, Newcastle, Port Stephens and Northern Sydney regions.

Since the expansion of our employee shareholding group in 2018, growth further afield into Western NSW, Northern NSW and South East QLD regions has been carefully considered and planned to a point where we are confident our reputation of trust and the same approach to business as our historical delivery areas, particularly with subcontractors, will be upheld and indeed successfully replicated.

The map displays the geographical footprint of North's operations across regional Australia. Key locations are marked with green dots and labeled: SOUTH EAST QLD, WESTERN NSW, MUDGEE, ORANGE, BRISBANE, NORTHERN NSW, NEWCASTLE & HUNTER REGIONS, and CENTRAL COAST & NORTHERN SYDNEY.

- HEAD OFFICE**
Mariners Centre of Excellence
Suite 501, 1 Bryant Drive
Tuggerah NSW 2259
- NEWCASTLE**
176 Christo Road
Waratah NSW 2298
- DUBBO**
3 Asset Way
Dubbo NSW 2830
- MUDGEE**
48 Broadhead Road
Spring Flat NSW 2850
- ORANGE**
Level 1, 209 Anson Street
Orange NSW 2800
- BRISBANE**
4/282 Sandgate Road
Albion QLD 4010

THE TRUE NORTH COMMITMENT

North is committed to institutionalizing a zero-tolerance system towards modern slavery through its construction supply and value chains.

True to our philosophy and value of trust, we are committed to ethical practices that will contribute to accelerating the stamping out of modern slavery in all its forms.

North complies with state, national, and international legislations against modern slavery in addition to the Modern Slavery Act 2018.



OUR CLIENTS



NORTH'S ASSESSMENT OF RISK TO HUMAN RIGHTS

An assessment of North's risk to breaching Industrial laws or human rights has resulted in the identification of the following elements being identified as our most exposed areas;

- Workplace Health and Safety, including Return to Work pathways and Workers Compensation
- Freedom of Association
- Discrimination and bullying
- Bribery and corruption
- Access to grievance mechanisms and consultation
- Labour rights – including
 - Supply chain stresses
 - Wage agreements, benefits, and superannuation
 - Work hours and fatigue management
 - Subcontract agreements
 - Entitlements of the above regarding imported goods

NORTH'S STAFF AND DIRECTLY CONTROLLED WORKERS

Any person performing permanent or casual work for North is employed under the relevant industry award or on a salary arrangement above this award. Recruitment at North has been designed to build a diverse and inclusive workplace, supportive of young workers, minority groups and our indigenous population.

All staff at North are inducted into the company values and Code of Conduct during our onboarding process, and regularly thereafter.

North's Code of Conduct details our expectations for lawful, fair, ethical, and accountable behavior of all employees for the duration of their employ, both on and off duty.

North support this standard of behavior by promoting an open and non-adversarial reporting framework, providing internal and external mentoring, internal and external counselling, and by partnering with organizations that are committed to long term community growth and empowerment.

North's training in our organizational policies and procedures ensures that all employees are aware of their obligations and have access to these documents and further information about these when required.

NORTH'S SUPPLY CHAIN: AN EXCELLENCE-DRIVEN PROCESS

At North, our value of Excellence is not limited to delivering quality finished products but also reflected in the transparent and stringent compliance to the ethical practices governing the industry.

This requires that all suppliers and subcontractors who contribute to our delivered goods complete a statutory declaration stating compliance with Australian workplace regulations and wage entitlements. North have recently introduced a Supplier Code of Conduct which details North's minimum expectations of our suppliers regarding compliance with local laws regarding human rights, labour procurement and remuneration, work health and safety, environment, and supplier diversity.

Suppliers' ability to meet or exceed the standards detailed within our Supplier Code of Conduct forms a part of North's procurement strategies and is included within the general conditions of contract provided to all suppliers and contractors.

NORTH'S RELATIONAL REPORTING AND GRIEVANCE MECHANISMS

North has the philosophy that people respond similarly to the way they are treated. This approach has afforded us to not only grow the business but also gain an exceptional Industrial Relations record. Our Company has always endeavoured to treat both our own employees and subcontractors equitably and with dignity and this has been repaid in kind.

All employees upon commencement are issued with the North Code of Conduct which provides a clear framework of the company's expectations of the behaviour and conduct of its Directors, Senior Management Team, Employees and Contractors.

Our reputation can be enhanced by working within the framework through everyday behaviours and choices. This code embraces what is expected of North employees and the conduct that is acceptable in the workforce. These expectations are underpinned by the relevant laws and regulations including the NSW Code of Practice for Procurement: Building and Construction.

All incidents, including industrial Relations disputes are reported and managed in accordance with North Procedure PRO022 Incident Reporting and Investigation Procedure and North's Disciplinary Procedure described in our SIMP and the related North Procedure PRO021 Corrective and Preventative Action.

The Site supervisor will monitor any site grievances through daily, weekly and monthly toolbox meetings for workers on site. Issues raised are recorded in the minutes of these meetings and closed out upon resolution.

Issues can also be reported anonymously on our QR Code Feedback provisions located prominently on our sites.

On North sites, workers are free to choose whether and by whom they wish to be represented in a grievance process. North will generally work with the individual workers to resolve any disputes (and/or their employer as required-unless there is a requirement to the contrary in the relevant industry agreement.)

CONTINUAL IMPROVEMENT AND FUTURE COMMITMENTS

Ahead of International Day of Remembrance of the Victims of Slavery and the Transatlantic Slave Trade on the 25th March 2025 (and annually thereafter) North have informed sub - contractors of the modern slavery requirements in our letting meetings and through our digital letting programme Pro-Cure Pro and have surveyed our Subcontractors and Suppliers during the letting process to gauge their understanding and inform them of their and our requirements. We continue on our current projects to collect live data of their knowledge and mitigation processes of modern slavery.

This process will provide us current data on ;

- Current and trending knowledge of modern slavery across our industry
- Current and trending knowledge held by our workforce
- Perceived and actual risk of modern slavery within our supply chain
- Suggestions for continual improvement

Over the next year, North will expand on our commitment to The Modern Slavery Act 2018 by:

- Providing information and resources to our contractors and suppliers about risk to their supply chains including face to face training on Modern Slavery.
- Continually monitoring and reviewing supply chain risks based.
- Obtaining statements of compliance to our Supplier Code of Conduct and commitment to eliminate Modern Slavery.
- Providing further training to our staff on Modern Slavery and the risks to the organization.

This statement was approved by Matthew Cook as the Managing Director of North Construction and Building.

Signed : 
.....
Managing Director – Matthew Cook

Date : ...19.12.2024.....

CONTACT US



HEAD OFFICE
Mariners Centre of Excellence
Suite 501, 1 Bryant Drive
Tuggerah NSW 2259

NEWCASTLE
176 Christo Road
Waratah NSW 2298

DUBBO
3 Asset Way
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MUDGEES
48 Broadhead Road
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ORANGE
Level 1, 209 Anson Street
Orange NSW 2800

BRISBANE
4/282 Sandgate Road
Albion QLD 4010

E mail@north.com.au
T (02) 4323 2633
F (02) 4323 2704

FOLLOW US   

Director - Preconstruction
Ray Millar - 0408 267 931
Business Development Manager
Kate Forrester - 0425 391 597

www.north.com.au