



MODERN SLAVERY STATEMENT

WARD CIVIL & ENVIRONMENTAL ENGINEERING

SYDNEY



NEWCASTLE



BRISBANE

MODERN SLAVERY STATEMENT

This Statement is made pursuant to the reporting requirements of the Modern Slavery Act 2018 (Cth).

REPORTING ENTITY

This Modern Slavery Statement, referred to as the Statement, is made by the reporting entity Ward Civil & Environmental Engineering Pty Ltd, ABN 65 098 942 459, referred to as Ward.

The registered office of Ward is Unit 4, 2-6 Orion Road, Lane Cove West, NSW 2066 Australia.

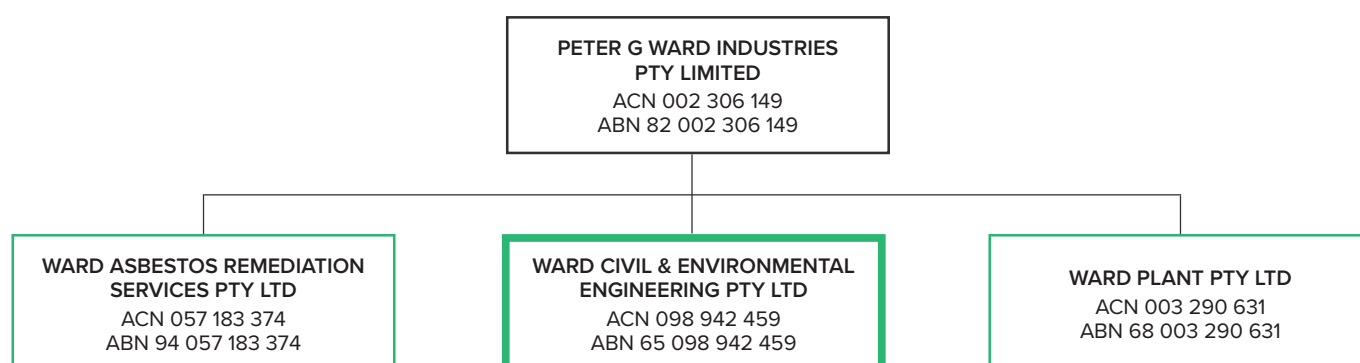
This Statement is for the financial year ending 30 June 2026.

This Statement has been approved by the Board of Ward and signed by David McPadden, Chief Executive Officer. This Statement includes the entities cited which form part of the Ward group. None of the group entities are themselves reporting entities.

STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Structure

Ward is a private, wholly Australian-owned civil and environmental engineering construction company.



Operations

Ward provides civil infrastructure, bulk earthworks and remediation services. Ward operates in New South Wales and Queensland.

Ward's head office is located in Sydney. Ward also has offices in Newcastle and Brisbane. The company tenders for works solely within Australia.

Ward does not own any foreign subsidiary or business in another country.

As a contracting business, Ward's workforce includes permanent employees and project-based personnel. Permanent full-time employees are usually fewer than 150. With several large projects underway, total employee numbers may exceed 150.

Supply Chain

Ward's supply chain consists of services, including labour, supplies, materials and products that contribute to Ward's civil works and services.

The supply chain directly engaged by Ward includes the following categories.

- a) Subcontractors for major works packages, including works to be performed by several lower-tier subcontractors
- b) Specialist subcontractors with significant material supply, including:
 - i) FRP, including formwork, reinforcement steel, concrete supply and placement
 - ii) Utilities work, including water supply and mains, stormwater and sewer works, valves, pits and control arrays, electricity supply works, high and low voltage works, data and communications cable installation, jointing and termination, gas pipelines and customer connection lines
 - iii) Asphalt supply and installation
- c) Engagement of labour hire workers
- d) Engagement of consultants including some who may have international outsourcing

Ward does not usually directly import supplies or materials from overseas. Most goods and services are sourced from companies based in Australia. However, Ward acknowledges that sourcing through Australian-based suppliers does not remove modern slavery risk from the extended supply chain. Construction materials, plant, equipment, vehicles, personal protective equipment, electronics, manufactured components and raw materials may involve multi-tier supply chains, international manufacturing, transport, extraction, processing or labour-intensive production activities where visibility is reduced and modern slavery risks may be higher. Where project clients and specifications require importation, which is typically managed by Australian suppliers contracted to Ward, the design and technical specification for any imported items is usually issued by the project client.

Light construction vehicles for relevant Ward personnel are purchased locally. Specialist construction plant and equipment is purchased locally. Most items of plant, equipment and vehicles are manufactured overseas.

Ward's approach is therefore focused on both direct suppliers and reasonably foreseeable extended supply-chain risks, including risks that may arise below the first tier of subcontracting or supply. Ward expects key suppliers and subcontractors to maintain appropriate controls over their own labour arrangements and supplier networks, and to provide information to Ward where requested to support risk assessment, procurement review and escalation of any concerns.

RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAIN

Ward considers the risk of modern slavery in its direct operations to be low. Ward also recognises that modern slavery risk can be higher in extended and less visible parts of the construction supply chain, particularly where goods or services involve labour-intensive activities, lower-tier subcontracting, migrant or vulnerable workers, offshore manufacturing, raw material extraction, transport services, or suppliers operating through complex supply networks. The main identified risks relate to economic exploitation through underpayment or non-payment in the following areas.

- a) Non-payment or underpayment of employee entitlements for migrant workers or other vulnerable persons by lower-tier subcontractors or suppliers, including owner-drivers providing transport services

- b) Non-payment or underpayment of employee entitlements for migrant workers or other vulnerable persons by labour hire organisations
 - i) Limited visibility over lower-tier subcontractors, offshore manufacturers, product suppliers and raw material sources used to produce construction materials, plant, equipment, vehicles, electrical components, personal protective equipment and other project-related goods
 - ii) Reliance on transport, cleaning, security, maintenance, waste, plant hire and other ancillary services where vulnerable workers, subcontracting arrangements or small business models may increase exposure to labour exploitation risks

ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

During the reporting period, Ward reviewed modern slavery risks through its management, procurement and contractor engagement processes.

Ward's processes, procedures and forms address modern slavery risks in its business operations as follows.

a) Ward's contracts require subcontractors to provide statutory declarations confirming employee entitlements have been paid

Non-payment and underpayment of wage entitlements in the construction sector are highly regulated in Australian jurisdictions and provide a strong protection against modern slavery practices. Ward currently operates in New South Wales and Queensland. Both states require contractor entities, including lower-tier subcontractors submitting claims for payment for construction work, to provide accompanying statutory declarations confirming that wages and other entitlements for workers who performed the work have been paid.

b) Using formal labour hire agreements with service providers

Ward engages service providers to provide labour hire workers under formal terms requiring compliance with all applicable employment laws. This includes payment of wages and other entitlements under the National Employment Standards and any applicable enterprise agreement or modern award.

c) Predominately procuring products from suppliers within Australia

All current vendors with material annual supply cost commitments are well-established Australian companies with published modern slavery policies. This minimises the risk of modern slavery practices within Ward's product supply chain.

d) Issuing major suppliers with a modern slavery questionnaire

Ward identifies its main product suppliers and requests that those suppliers complete a questionnaire to identify modern slavery risks. Any high-risk indicators or anomalies are reviewed and followed up as appropriate.

e) Reporting email address

Ward will maintain a dedicated reporting email address for modern slavery and whistleblower-related concerns. Employees, subcontractors, suppliers and other stakeholders may use this email address to report concerns about matters relating to Ward's operations, projects or supply chains, including actual or suspected modern slavery practices. If Ward becomes aware of any actual or suspected occurrence of modern slavery in its operations or supply chains, or in those of any entity it owns or controls, Ward will take reasonable steps to respond to and remedy the occurrence.

f) Surveys

Ward conducts in-house employee culture surveys to identify early signs of any unreported matters of concern about the company's commitment to a safe workplace that is free of discrimination, bullying or harassment, and vigilant to any abuse, underpayment of workers or other modern slavery practices..

g) Training

Ward provides targeted training to help key stakeholders understand relevant legal, contractual and procurement controls, including modern slavery risk indicators and escalation requirements.

The training focuses on compliance requirements, standard contract forms and procurement processes. Content includes compliance with laws addressing modern slavery and Ward's obligation to remain vigilant and apply risk management judgement where a specific project scope, supplier arrangement or procurement pathway may present a higher or different risk of modern slavery practices.

h) Industry participation and knowledge sharing

Ward is a member of industry associations including Roads Australia and Master Builders NSW, SAI Global and the Civil Contractors Federation. Ward representatives attend committee meetings and seminars which highlight and discuss current industry news and any items of expressed concern including those in relation to modern slavery.

HOW WARD ASSESSES THE EFFECTIVENESS OF ACTIONS

Ward will continue to review the effectiveness of measures implemented to mitigate the modern slavery risks identified through our management review processes, which includes audits, trend analysis, risk reviews and other such activities determined necessary to ensure the implementation of our risk control measures are being carried out effectively.

EFFECTIVENESS MEASURE	PERFORMANCE INDICATOR	REVIEW METHOD
Supplier and subcontractor due diligence	Number and percentage of targeted suppliers and subcontractors issued modern slavery questionnaires, and number of responses received	Procurement review, supplier register review and follow-up of non-responses or high-risk indicators
Extended supply-chain visibility	Number of key suppliers asked to confirm controls over lower-tier subcontractors, labour arrangements or high-risk product categories	Review of questionnaire responses, tender submissions, prequalification records and procurement exceptions
Training and awareness	Number and percentage of relevant employees completing modern slavery awareness or procurement control training	Training records, feedback review and inclusion of refresher topics in management review
Grievance and reporting pathways	Number of modern slavery-related concerns, reports received through Ward's reporting email address, complaints or escalation events received and closed out	Review of reporting email records, complaint registers, investigation outcomes and corrective actions
Corrective action and continuous improvement	Number of identified actions closed within agreed timeframes and number of controls updated following review	Management review of action registers, audit findings and procurement process improvements

CONSULTATION AND COMMUNICATION ACROSS THE WARD GROUP

The Ward group entities have a single reporting and consultation structure governed by the same Board and management team as the reporting entity. This is not a joint statement. The group entities adopt the same actions, assessments, forms and processes, and attend the same corporate training program. Ward consults internally with relevant management, procurement, operational and support functions as part of preparing and reviewing this Statement.

OTHER RELEVANT INFORMATION

Ward remains committed to continuous improvement in the identification, assessment and management of modern slavery risks. During the next reporting period, Ward will continue to review supplier engagement practices, contractor onboarding controls, training content and reporting pathways to strengthen awareness and oversight of modern slavery risk across its operations and supply chain. Ward will also seek to improve visibility over extended supply-chain risks by refining supplier questionnaire coverage, recording measurable indicators, reviewing responses from key suppliers and subcontractors, and using the outcomes to inform procurement decisions, training priorities and future reporting.

A handwritten signature in black ink, appearing to read 'DMcPadden'.

DAVID MCPADDEN
CHIEF EXECUTIVE OFFICER



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