



## **MODERN SLAVERY ACT**

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OUR STATEMENT FY20/21

Constructing our future on the strength of our past



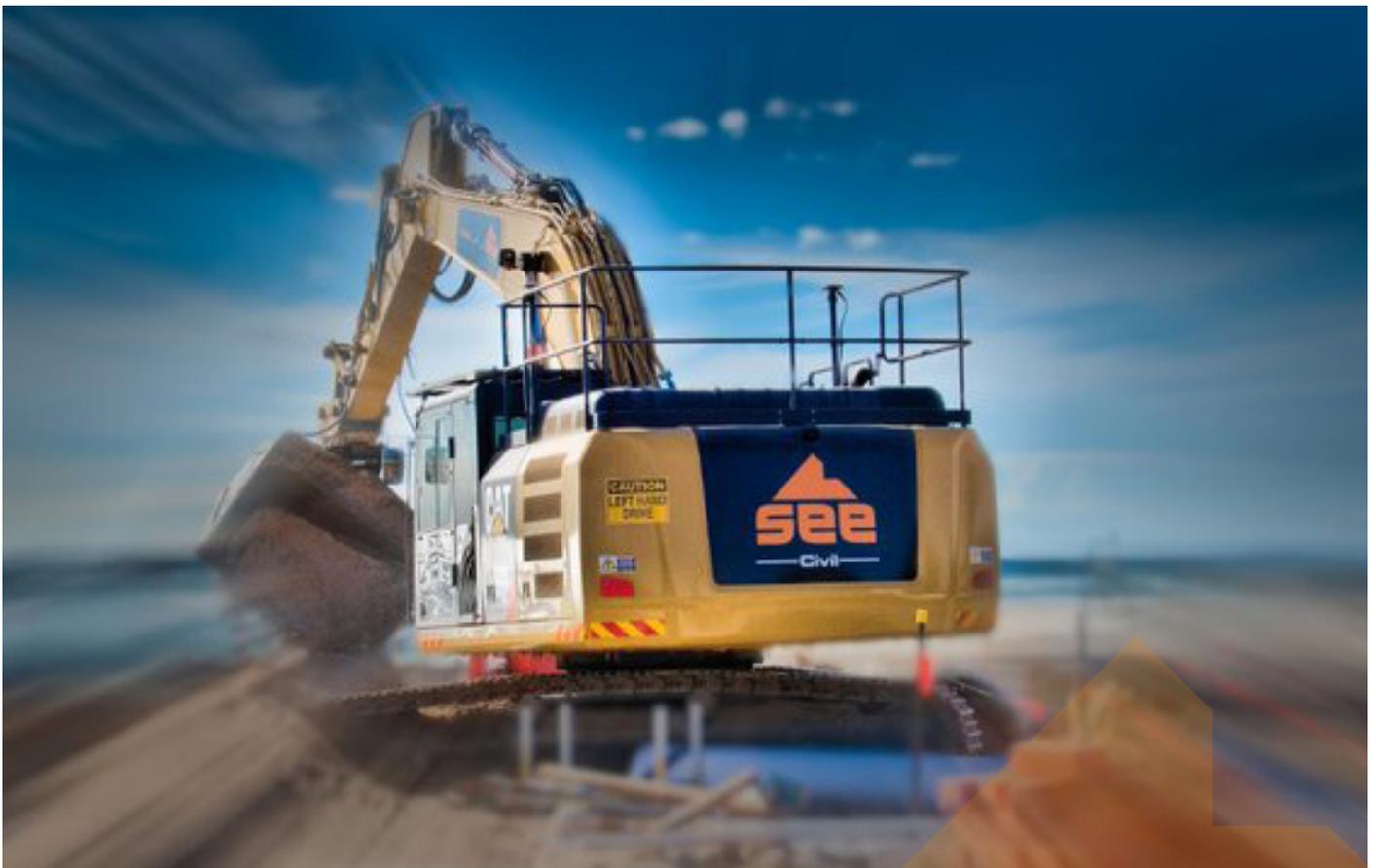


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# OUR STRUCTURE



SEE Group Parent Pty Ltd is an Australian owned, family run business. Our business has more than 30 years success in the civil construction industry. SEE Group Parent Pty Ltd (SEE Group) (being the ultimate parent company) comprises of a number of entities that contribute to its total annual consolidated revenue as at 30 June 2021.

Entities within SEE Group include, SEE Group Holdings Pty Ltd, Integrated Concrete Solutions Pty Ltd, Quarry Solutions Pty Ltd, Civil Rent Pty Ltd, DMC Quarries Pty Ltd, SEE Civil Pty Ltd, SEE Asphalt Pty Ltd, Quarry Solution Assets Pty Ltd, SEE Civil Assets Pty Ltd, SEE Developments Pty Ltd and SEE Land Holdings Pty Ltd.

SEE Group currently employs over 330 staff across New South Wales and Queensland.





# OPERATIONS



SEE Group's subsidiary companies engage in the business of civil and urban infrastructure, quarrying, mining, rental of plant and equipment as well as recently setting up an asphalt plant.

The combined expertise of the SEE Group entities allow SEE Group to deliver complete construction solutions providing value-for-money and the ability to control projects, start to finish.

Each SEE Group business exists to play a key role in delivering the civil construction and materials needed for our projects, creating complete construction solutions for our Clients, providing value for money and the ability to control projects, start to finish.

**S**EE Civil deliver construction and engineering services for major infrastructure and urban development projects.

**Q**uarry Solutions is our specialised quarrying and material supply business, delivering materials to specification for a range of clients and customers.

We differentiate ourselves with our robust vertically integrated self-perform model to deliver optimum results for clients.

SEE Group operates under an Integrated Management System, underpinned by our organisational DNA. This system creates consistency across all of our operations and ensures each business and project delivers the high safety, environmental and quality standards our clients expect when working with us.

Our project management systems have been audited and accredited under the relevant Australian standards and we hold national prequalifications.

We pride ourselves on our ability to build strong relationships with our clients based on mutual trust and collaboration.

## The SEE Group DNA



### ACCOUNTABILITY

Owning our actions 100% of the time



### INNOVATION

Always looking for new ways to improve our work and ourselves



### COLLABORATION

Working as a team with each other and our clients, suppliers and subcontractors



### EMPOWERMENT

Trust and encourage every one to grow



### PASSION

Loving what we do and working hard towards our goals

# SUPPLY CHAINS



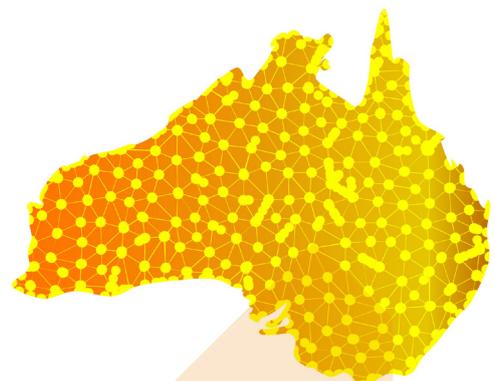
The diagram below outlines the key areas of supply within the SEE Group business.

From these key groups, SEE Group sources services relating to corporate uniforms and personal protective equipment, construction materials including raw resources, machinery and equipment hire, car leasing, design services, communication services, traffic management solutions, security services, waste and recycling facilities, insurance and environmental landscaping.



SEE Group engaged approximately 1,175 suppliers predominately from Australia in FY 20/21 and some overseas companies, such as China, Finland, Germany, Italy, Japan, New Zealand, Singapore, South Korea, Sweden and the USA. This largely related to the supply of materials and plant for various projects. Many of these suppliers will have subsequent suppliers of their own.

SEE Group generally only engages with local Australian suppliers with emphasis on sourcing local supplies where a project is based. We seek to encourage and support local economic development.



# MODERN SLAVERY RISKS

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‘Modern Slavery’ describes situations of serious exploitation in Australia or abroad such as human, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour. It does not include substandard working conditions or underpayment of workers. These practices are also illegal and harmful and may be present in situations of modern slavery.

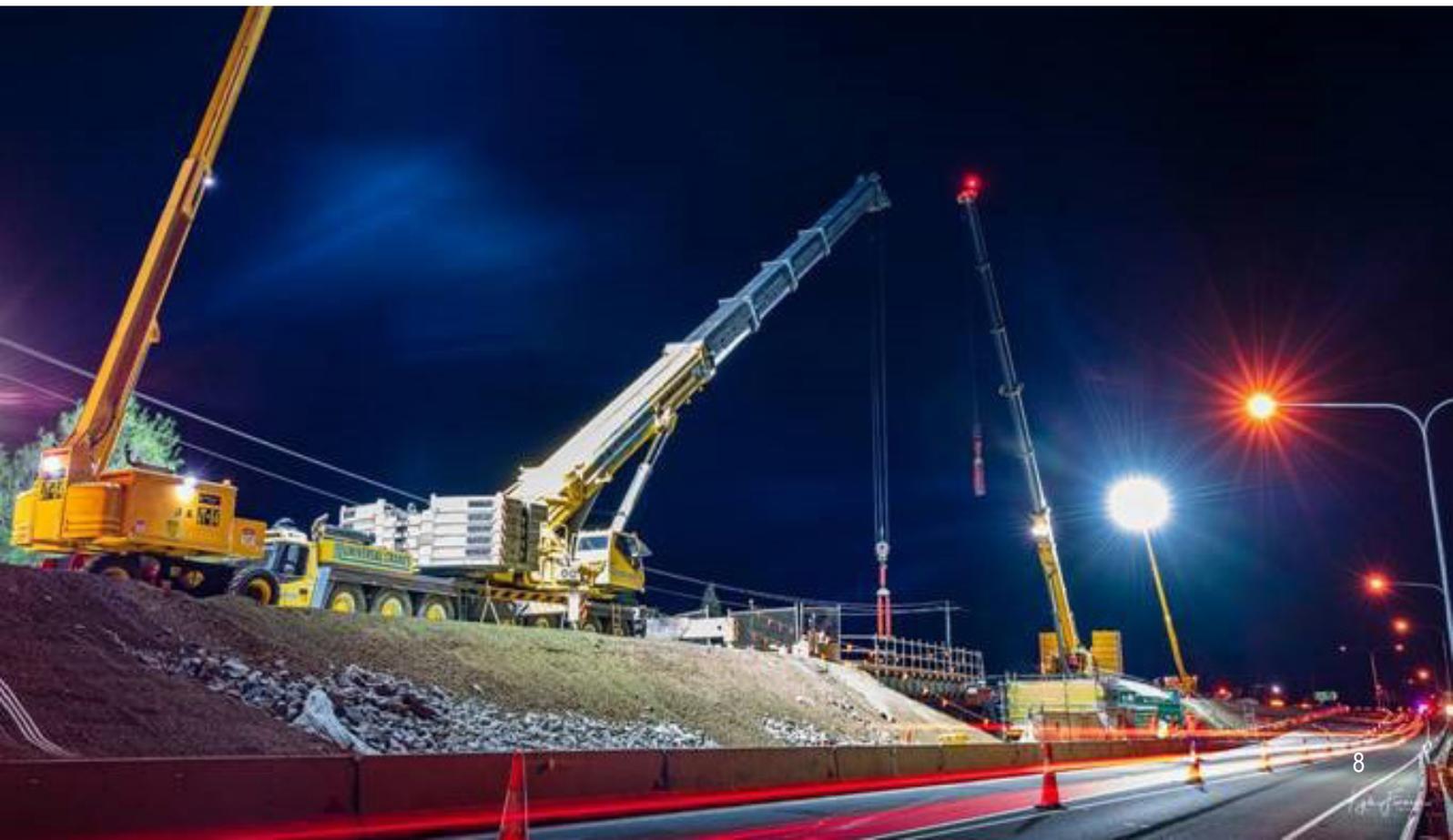
The United Nations Guiding Principles of Business and Human Rights 2011 underpins the core principles of the Modern Slavery Act 2018 (Cth).

SEE Group places respect for Human Rights at the forefront of its operations and supply chains and aims to embed practices that support these principles throughout the business. Consequently, SEE Group endeavours to engage suppliers with similar ethics, values and practices pertaining to human rights.

SEE Group considers identifying Modern Slavery risks and practices of paramount importance to maintain safe, lawful and ethical business operations.

The risks associated to various suppliers is specific to the type of supply being engaged and many factors contribute to this e.g location, type of supplier, company size.

SEE Group has assessed the risk of modern slavery within the Group’s operations as low impact. SEE has a comprehensive system of checks and procedures to ensure compliance with all legislative requirement across the work force and suppliers it engages with.



# RISK MITIGATION ACTIONS



We endeavour to engage with local services and products. This is part of our ongoing commitment to local communities to where our projects are located, to inject financial growth in that community.

We have a particular focus on employing the skills of indigenous persons and businesses as part of the projects we deliver.

The below diagram demonstrates SEE's current practices of ensuring human rights are at the forefront of what we do:



# ASSESSING EFFECTIVENESS

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- SEE Group actively engages with its suppliers to determine whether they are compliant with our standards. If an area of concern is identified with a supplier, we proactively engage in positive dialogue in order to remedy any failure of our policies and Code of Conduct.
- SEE Group's actions of an comprehensive onboarding process and contractual terms requiring suppliers to comply with legislative obligations including those relevant to eliminating modern slavery and SEE's policies and procedures appear to have been effective in minimising the risk of modern slavery within the main areas of SEE Group's direct supply chain.
- Responsibility for assessing and addressing modern slavery risks has been assigned to the Audit and Risk Committee.
- The Group's modern slavery risk management approach will be approved annually and by the Board of Directors.

# ACTIONS TAKEN IN THE LAST 12 MONTHS

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The Audit and Risk Committee are in the process of compiling recommendations to the Board of Directors of further strengthening the contractual terms with suppliers under the standard form contracts concerning suppliers' obligations pertaining to modern slavery legislation. This includes a requirement by the supplier to sign a Statutory Declaration confirming that they currently comply and will continue to comply with the modern slavery legislation and that their suppliers to whom they engage are, to the best of their knowledge, also compliant with this legislation.

The Audit and Risk Committee have identified existing policies and training will need to be updated to provide for general modern slavery risk and processes need to be incorporated in further business system training as to ensure SEE Group and its suppliers continue to manage the risks associated with modern slavery.

The Audit and Risk Committee will continue to meet regularly to monitor and mitigate any potential modern slavery risks with suppliers and report to the Managing Director of any concerns that may arise.



# CONSULTATION WITH SEE GROUP ENTITIES



SEE Group recognises that each entity has a role to play in addressing modern slavery risks. This Statement has been prepared in consultation with each entity and has been approved by SEE Group's board. The process of consultation involved engagement with the Group's Executive Leadership Team and input from the various relevant internal stakeholder groups (including Finance, Commercial and Legal and People and Culture).

This statement was approved by the SEE Group Parent Pty Ltd Board of Directors on 30 November 2021.

A handwritten signature in black ink, appearing to be "S Turner", written over a horizontal line.

**Steve Turner**  
Managing Director  
14 December 2021





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