

# MODERN SLAVERY STATEMENT

FINANCIAL YEAR 2021 - 2022

Version: 2

## INTRODUCTION

Modern slavery is a crime that is estimated to violate the fundamental human rights of some 45 million men, women and children globally, through situations of exploitation, threats, coercion and deception.

**The term** 'modern slavery' is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. **The definition** of 'modern slavery' under the Modern Slavery Act includes serious exploitation such as trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services.

As part of our modern slavery assessment, we have collated data and performed analysis across all reporting entities and their controlled entities, as the controlled entities are also considered reporting entities for purposes of this statement.

## OUR COMMITMENT

Renascent is committed to eliminating the potential for modern slavery practices in our operations and supply chain across all levels of the business. Respecting human rights aligns with our core values and beliefs and we aim to treat everyone fairly and create a workplace and operating environment that is safe, ethical and transparent.

We have commenced our journey with rigour and taken meaningful steps to address modern slavery risk in our first year of reporting. As we progress, we will continue to address next steps and refine and further improve our approach and assessment to identify and respond to the risk of modern slavery practices within our organisation.

### 1.0 REPORTING ENTITY IDENTITY

This statement, made pursuant to the Modern Slavery Act 2018 (Cth), is published on behalf of Renascent Australia Pty Ltd and its wholly owned subsidiaries, Renascent Regional Pty Ltd, Renascent Constructions (Victoria) Pty Ltd, Renascent Western Australia Pty Ltd, Renascent QLD Pty Ltd and Dice Renascent Pty Ltd (together referred to as Renascent, we, us or our).

From a practical perspective, these six Australian entities operate as one entity and share all board members, corporate functions, policies and procedures.

## 2.0 OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

### OUR STRUCTURE

Renascent is a privately owned construction company that has been building for government and private clients since 1995, specialising in construction, refurbishment, fit out and facilities maintenance.

We relate to the local community around us and we are committed to ‘giving back’. With offices in Sydney, Melbourne, Orange, Brisbane, Canberra and Perth, our teams are very active in the great Australian community and support numerous local, civic, professional boards and charitable organisations. We strive to share our success with those around us.

Each of our entities are stand-alone businesses governed and managed by the Renascent Board of Directors, our Executive Management Committee and our Senior Executives and Managers. Dice Renascent is a 50-50 jointly owned and operated indigenous company.

These entities all operate under the same policies, procedures, plans and integrated management system governed and managed by the Renascent Board of Directors, our Executive Management Committee and our Senior Executives and Managers. Our head office is located at Level 4, 174 Pacific Hwy, St Leonards NSW, with satellite offices in Brisbane, Orange, Melbourne and Perth.

<p><b>Renascent Australia Pty Ltd</b></p> <p>Level 4, 174 Pacific Hwy St Leonards NSW 2065</p> <p>ABN: 53 109 220 760 ACN: 109 220 760</p>	<p><b>Renascent Constructions (Victoria) Pty Ltd</b></p> <p>Level 1, 42 Moray St South Melbourne VIC 3205</p> <p>ABN: 54 135 571 765 ACN: 135 571 765</p>	<p><b>Renascent Regional Pty Ltd</b></p> <p>Level 1, 209 Lords Place Orange NSW 2800</p> <p>ABN: 38 158 296 265 ACN: 158 296 265</p>
<p><b>Renascent Western Australia Pty Ltd</b></p> <p>Level 2, 267 St Georges Terrace, Perth WA 6000</p> <p>ABN: 59 608 156 136 ACN: 608 156 136</p>	<p><b>Renascent QLD Pty Ltd</b></p> <p>2E, 2 - 4 Flinders Parade, North Lakes, QLD 4509</p> <p>ABN: 83 125 718 229 ACN: 125 718 229</p>	<p><b>Dice Renascent Pty Ltd (Indigenous Partnership)</b></p> <p>7/3A Verrinder Road, Berrimah NT 0828</p> <p>ABN: 39 608 262 540 ACN: 608 262 540</p>



## OUR OPERATIONS

Renascent is a construction company specialising in fitout, refurbishment, construction and maintenance services. In our role as head contractor, Renascent evaluates, engages and monitors the many service providers that are sub-contracted to us in the performance of these building works. Renascent also undertakes a significant amount of procurement of goods and services on behalf of our clients, in order to satisfy the requirements of each project.

Our National Leadership Team is made up of highly skilled and experienced people who have both the knowledge and expertise within the construction industry as well as the skills to lead our teams in achieving the best possible outcomes.

Proven by our impeccable safety record on all projects, our business maintains a strong focus on governance through the ongoing development of accredited integrated management systems. As a responsible corporate community member, we use industry best practice and are committed to the use of our governance framework strengthened by regular internal and external auditing.

Our sites are intelligently managed safely, by all of our team - starting with the managing directors, right through to all of our site personnel.

Renascent has processes and procedures in place to ensure that it complies with all applicable legislation and standards, including, but not limited to the Fair Work Act 2009, Work Health and Safety Act 2011 and the Modern Slavery Act 2018 (Cth).

Our projects achieve such high safety standards through the use of our ISO accredited systems.

The evolution of our business is founded by our ability to innovate and lead change to provide our clients with project and financial surety.

**Experience, intellect, resources and systems** are the foundation of our delivery model.

Our Philosophy is simple. Manage thoroughly at the front end to deliver certainty to completion.

## Accreditations



### FS 678732

Renascent Quality Assurance risk control processes and procedures are independently certified to ISO 9001



### OHS 678739

Renascent Work Health and Safety risk management processes and procedures are independently certified to the Office of Federal Safety Commission (OFSC) and AS/NZS 4801



### EMS 678737

Renascent Environmental and Waste Management processes and procedures are independently certified to ISO 14001 embracing sustainability principals of the Green Building Council of Australia (GBCA) Green Star requirements

## SUPPLY CHAIN

Renascent has over 130 employees and can potentially have 30 active projects at any one time across multiple industry sectors. The people we have placed into our team are the driving force behind the reliability and success of the projects we undertake. Our people are more than employees, they are individuals with diverse views, techniques and strategies who form part of the Renascent family. Together they make up a highly dynamic team, capable of moving forward with confidence into every project.

The company is heavily reliant on the use of subcontractors and suppliers to deliver projects. Sub-contractors are largely responsible for the procurement of the products and materials required to complete these projects within the scope and specifications of their packages. In some instances, Renascent or our clients may take direct responsibility for some of these procurement decisions.

For existing suppliers, we have embedded ongoing due diligence and oversight of Modern Slavery risks in our standard supplier engagement and management processes.

As a pre-condition accepting new vendors to our business, Renascent now require mandatory acknowledgement of receipt and understanding of our Modern Slavery objectives.

### 3.0 MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

As we progress with embedding our supply chain risk systems and processes, we are taking a phased approach toward improving transparency across our direct and extended supply chains throughout our operating regions.

The construction sector has experienced longstanding demand for low-skilled, manual, often migrant labour, which makes it particularly vulnerable to risks of debt bondage, human trafficking and forced labour practices. The indirect use of site labour utilising low skilled manual work recruited for sub-contractors by labour hire agencies, is an area requiring greater transparency across the construction industry.

Another area of risk is the lack of visibility in multi-tiered manufacturing supply chains for construction materials. Materials are sourced, processed, assembled and finished, traversing several countries, some of which have an elevated risk of modern slavery. These production phases are transient and, in the property and construction industry, have not been readily traceable to the end user.

Globally, 18% of modern slavery victims are found in the Construction Industry, making it a high-risk industry.

Common modern slavery risks in construction are:

- Forced or unpaid labour
- Child Labour
- Unsafe conditions
- Debt bondage

The drivers of the high victim rate are:

- High demand for low skilled labour
- Poor visibility over supply chain – due to outsourcing
- Materials being sourced from high-risk geographies.

Renascent is committed to developing a detailed risk assessment framework to identify risks deeper into our supply chains in FY22. In doing this, Renascent will strive to make more informed decisions on procurement and supplier due diligence.

## 4.0 ACTIONS TAKEN TO ASSESS AND ADDRESS OUR MODERN SLAVERY RISKS

During the reporting period, Renascent's priorities were to better understand the modern slavery risks within our operations and supply chain and establish a framework to ensure that modern slavery is considered in all our operational and supply chain relationships.

Key actions undertaken include:

- High level Modern Slavery action plan developed summarizing the key areas of focus, the focus areas for the next 1 to 2 years, and the intended outcomes of each action. The action plan is a fluid document that is progressively updated and revised.
- Company Modern Slavery Policy finalised and signed off by the Renascent Board. This policy has been communicated to staff and is available on our Intranet. It has also been provided to clients upon request.
- Supplier Code of Conduct developed and implemented. The code sets out our expectations of our subcontractors and suppliers on a number of issues including:
  - Labour and Human Rights
  - Modern Slavery
  - Health and Safety
- Legal review undertaken on other relevant policies and contracts:
  - Employee Code of Conduct
  - Subcontract Agreements
  - Employment Contract
- Subcontract Agreement updated to address modern slavery risk and adherence to the Supplier Code of Conduct.
- Whistleblower Policy developed

Within Renascent, a suite of tools and guides has been developed and made available through our intranet for employees to readily access. Our Modern Slavery reference material provides a practical go-to reference in understanding the issues around modern slavery and guidance on what to do if an employee spots something suspicious.

## 5.0 ASSESSING OUR EFFECTIVENESS OF ACTIONS TAKEN

As this is the first reporting period for Modern Slavery, Renascent's focus has been around education and awareness, and establishing a framework and action plan for subcontractor and supplier implementation, and to ensure continuous improvement.

Managing the risk and assessing the effectiveness of Renascent's actions, requires ongoing commitment and collaboration with our suppliers and the industry. To manage this an internal Modern Slavery Working Group has been created. The working group comprises the following roles:

- Group Operations Manager
- Group General Manager
- Chief Financial Officer
- National HSEQ Manager
- National HR Manager

## 6.0 CONTINUOUS IMPROVEMENT COMMITMENTS

We recognise tackling systemic modern slavery practices in global supply chains requires strong collaboration not only with suppliers, but government, industry and civil society.

Eliminating modern slavery risks from our supply chains remains a resolute commitment, as we continue to progress our initiatives in collaboration with our suppliers, our people and our stakeholders.

Renascent is committed to the following actions during the FY23 reporting period:

- **Risk Assessment:** Undertake a detailed risk assessment of our operations and supply chain; review results and agree a plan to monitor and mitigate key risks.
- **Due Diligence:** Implement further due diligence by amending our subcontractor screening and interview process (at the time of tender to include questions around modern slavery risk and compliance).
- **Training and Awareness:** Roll out of an internal Modern Slavery training program to all staff.

This statement was approved by the Board of Directors of Renascent Australia Pty Ltd on 02<sup>nd</sup> December 2022.

Signed by:   
\_\_\_\_\_

Andrew Melville  
Joint Managing Director

Date: 02 December 2022

Signed by:   
\_\_\_\_\_

Tony Hargreaves  
Joint Managing Director

Date: 02 December 2022