

Modern Slavery Statement

Financial
year ending
**30 June
2024**



Our Guiding Principles

Care

WE create a place where our people are safe and can flourish

Integrity

WE do what we say and we act with character and competence

Passion

WE work together to achieve outstanding outcomes

Respect

WE value the people we work with and the world we live in

Future

The work WE do enriches the lives of future generations



Statement by our CEO

Established in 2001, Guidera O'Connor is a privately owned company operating Australia wide, with a reputation for collaboration, innovation and quality workmanship.

We strongly support our community with undergraduate internships, apprenticeships, indigenous employment and we are ongoing sponsors of WaterAid and the Australian Water Association.

GO has a deep commitment to our 5 guiding principles, which shape our business decisions and strategies. They are our foundation and remain integral to our continued success over the last 23 years. We work to the highest standards of business ethics and are committed to addressing human rights abuses and the risks of modern slavery in our business and supply chains.

This document, our first Modern Slavery Statement, applies to the 2024 Financial Year and addresses GO's obligations under the Australian Modern Slavery Act 2018 (Cth).

It describes the actions GO has 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.

Richard Trapp

Chief Executive Officer



Criteria 1 & 2: Reporting Entity & Operations

Reporting Entity

This Modern Slavery Statement is made on behalf of Guidera O'Connor Pty Ltd ABN 71 099 012 870 for the reporting period ended 30 June 2024 pursuant to the Modern Slavery Act 2018 (Cth) ('Modern Slavery Act')

GO's registered office and principal place of business is:

31 Holland Street
Thebarton SA 5031

Operations

Established in 2001, Guidera O'Connor is a privately owned company operating Australia wide, with a reputation for collaboration, innovation and quality.

Employing 200 employees, Guidera O'Connor designs and constructs sustainable water treatment projects employing a diverse team of engineers, drafters and construction personnel delivering key infrastructure projects for the Australian water industry.

GO have a large in-house design team and use the latest BIM technology to create detailed 3D and Virtual Reality models, complementing the design work of our consulting partners.

We design and construct in house, employing project and design managers, construction managers, engineers, drafters, supervisors, trades people, apprentices, contract administrators, HSEQ professionals, undergraduates and support staff.

We highly value our employees, providing them with a welcoming, supportive and comfortable working environment, advancement opportunities and mentoring programs.

At GO we maintain close, ongoing relationships with our clients, consultants, suppliers and subcontractors, delivering over 400 water projects throughout Australia.





Criteria 3: GO's Modern Slavery Risks

Guidera O'Connor recognises the importance of our human rights responsibilities and the risks to people and to the business when human rights are violated. We acknowledge and are committed to ensuring we understand any risks within our business and that we will put in place controls to address such risks and implement robust reporting and review processes to ensure we continue to evolve our approach to managing these.

Focusing on risks of harm to people highlights the connection between modern slavery practices and other human rights.



Employment Risk

Guidera O'Connor has approximately 200 directly employed personnel. The risk of modern slavery in our direct workforce is managed through our compliance with employment and human rights legislations which are implemented and monitored through our highly developed management systems which include the following:

- All employees have a formal contract of employment which is covered by either:
 - Enterprise agreements
 - Modern Awards
 - Common Law provisions under the Fair Work Act (Cth)
- Statutory entitlements such as superannuation, accrual of leave entitlements, redundancy and workers compensation is managed in accordance with the relevant industrial instrument, employment contract, GO policies and legislated statutory obligations.
- We have a People and Culture team that recruit and onboard new employees which include:
 - pre-employment screening procedures to ensure working rights and employment checks are conducted; and
 - preparing employee employment contracts which include all necessary provisions under the industrial instrument and legislated requirements.
- Our induction process ensures that all new employees are provided with information about our policies and procedures.
- We provide regular communication to all employees.
- We consult with employees about proposed workplace change which have potential for impact on employees and contractors.



Supply Chain Risk

GO 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.

GO's Main Categories of spend:

Sub-Contracts and Labour:

- Civil Infrastructure
- Mechanical Equipment
- Electrical Equipment
- Electrical Controls & Installation
- Design Services
- Landscaping Services
- Hire of equipment

Materials:

- Chemicals

We only contract directly with Australian companies and do not contract directly with overseas suppliers unless there is a specific item which our clients request that is only available overseas.

This minimises the supply chain risks of modern slavery as well as maximising investment into the local economy. As the majority of GO'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.

For the current reporting period, GO used the Global Slavery Index 2023 to identify geographic regions presenting a higher risk of exposure to modern slavery.

As a result of this review, 100% of GO's direct suppliers are based in low-risk geographic locations.

Sector Risks

GO 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 GO's overall operations. Over the next twelve months these will form part of the overall review of our risk profile and plans to manage any identified risk.



Criteria 4: Mitigating those risks

Guidera O'Connor will take a risk-based approach to identifying, assessing, understanding and managing our obligations under the Act. Key to this will be socialising and educating our executive, management and key personnel.

Our approach will also review our supplier and sub-contractor arrangements and ensure there are measures in place to address risks.

- recognising our modern slavery obligations and commitments and educating our people.
- ensuring that all employees have a contract of employment that is compliant with legislated requirements.
- identifying and working with companies that are known to us and that have standards that are aligned with our own.
- 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.

Planned Initiatives

- update our policies to better address modern slavery due diligence requirements and further outline Guidera O'Connor's commitment to identifying, preventing, and reporting modern slavery risks within our operations and supply chains.
- revise existing subcontractor agreements/ contracts and where necessary, expand upon our obligations regarding modern slavery.
- continue to develop new tools and offer relevant education and training to all employees.
- provide training for relevant employees to assist in identifying practices which may constitute modern slavery, manage risks and ensure compliance.

Criteria 5: Assessing our Effectiveness

Guidera O'Connor recognise that we are at the foundational stage and will continue to develop our systems to manage modern slavery risks across our business and supply chain.

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:

- reviewing and revising our Business Code of Conduct to clarify our standards for our suppliers in relation to modern slavery, human rights, sustainability and other relevant issues.
- conduct business reviews to ensure consistency with GO's corporate policy updates addressing modern slavery.
- review our supplier engagement processes and contracts.
- the establishment of a Modern Slavery alert mechanism where our business has to engage with suppliers outside our normal supply chain.

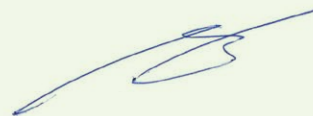
Criteria 6 & 7: Consultation/ Other Information

This Modern Slavery Statement has been prepared in consultation with key stakeholder's and the Senior Leadership Group across Guidera O'Connor

Approval

This statement was approved by the board of Guidera O'Connor in their capacity as principal governing body of Guidera O'Connor on 19th December 2024

Mick O'Connor



Board Chairman, Guidera O'Connor Pty Ltd





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South Australia

31 Holland Street,
Thebarton SA 5031
08 8238 9999

Western Australia

9 Tidal Way,
Bibra Lake WA 6163
08 9540 1000

New South Wales

1 Tudor Street,
Newcastle West NSW 2302
1800 954 421

