



**Modern Slavery Statement  
Financial Year 2019/2020**

### 1. Introduction

This is the first Modern Slavery Statement (“Statement”) for Pensar Construction Group Pty Ltd, as informed by the Federal Modern Slavery Act 2018. The purpose of this statement is to outline our approach in ensuring that Pensar has robust frameworks and processes in place to minimise the risk of modern slavery in our business operations and supply chain. We strive to continually improve and perfect our processes, and commit to doing all that we can to help eliminate the risk of modern slavery.

### 2. Our Business

Pensar designs and delivers critical infrastructure solutions for a wide range of industry sectors, providing a broad spectrum of technical capabilities in utilities, marine and maintenance to serve the diverse needs of government departments, regional and metropolitan councils, and the private sector. Pensar has a track record of quality and capability as a critical infrastructure provider, with a philosophy of consistently delivering on expectations.

### 3. Core Values

Core values support our vision, shape our culture, and represent what Pensar values. They are the essence of the company’s identity – its principles, and beliefs. In a technical discipline of producing critical infrastructure, the core values below, provide a behavioural set of criteria which our team align with in their conduct at Pensar.

By embracing these core values and the pursuit of continual improvement, we can ensure a prosperous future for the company and its people. The core values are integral to all aspects of our business:

**Respectful** - Considered, tactful and diplomatic in all dealings.

**Patient** - Understanding, measured and confident of achieving positive outcomes.

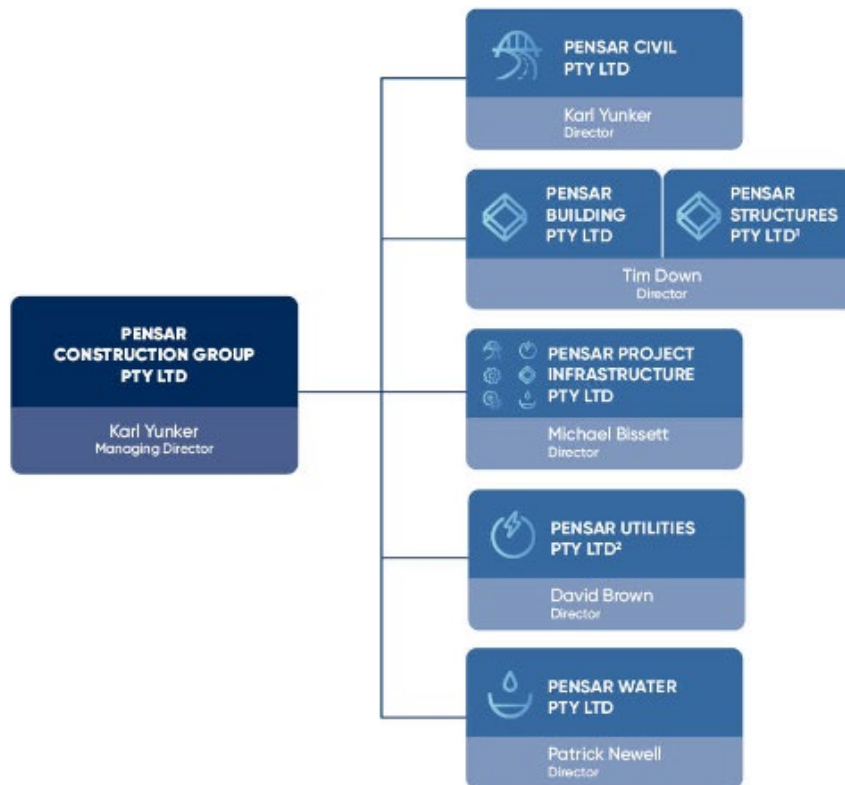
**Flexible** - Open to change and considerate of other people’s views.

**Accountable** - Reliable to deliver on our promises.

**Focused** - Driven with clear purpose.

### 4. Our Structure and Operations

Pensar provides integrated project solutions that span multiple infrastructure types. Drawing on a strategic cross-section of capabilities from across the organisation, we produce a holistic and multidisciplinary solution to industry’s diverse requirements. Pensar’s senior managers are highly credentialed and experienced across the disciplines of power, water, civil infrastructure, concrete remediation, and structural services (utilities, marine and maintenance). We delivery critical infrastructure projects essential everyday life in Australia and the Pacific. We apply this philosophy on every project, with every person, every day. Pensar’s day to day operations involve a centralised group services’ division, along with specialist technical divisions delivering infrastructure projects in regional, remote, and metropolitan areas.



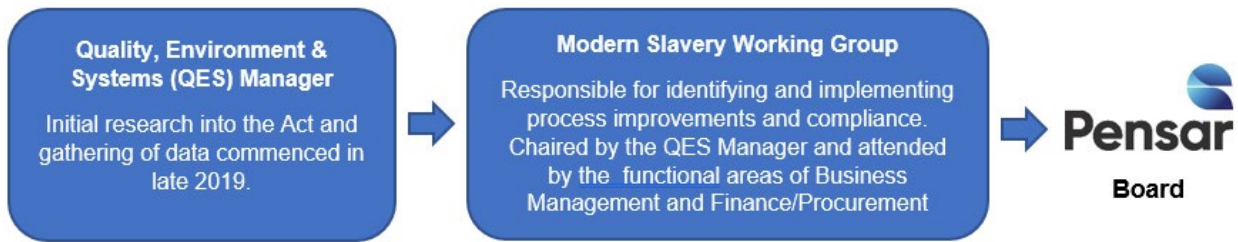
## 5. Our Suppliers

We are continuously procuring project specific plant, equipment, and materials from our wide range of Australian suppliers, to enable us to deliver vital projects in the utilities, marine and maintenance fields. The categories and description of items we typically procure are set out in the table below.

Category	Description of goods and services provided
Plant Hire	Hiring of earth moving equipment, specialist equipment, site office containers
Labour Hire	Construction labour, traffic controllers
Direct Equipment	Water pumps, switchboards, traffic lights, streetlights, sewerage and water treatment plant equipment, water reservoirs
Direct Materials	Electrical wires, conduits, building products, water pipes, concrete, coatings, paint, street signs, road building material
Ancillary	Building tools, protective clothing, construction motor vehicles and maintenance, safety equipment, freighting of equipment and materials to various project sites, engineering, and design
Administration	Stationery, office equipment, telecommunications, office cleaners, travel, consultants, rent, accommodation, insurance

During the financial year ending 30 June 2020, the group procured \$76million of goods and services from 2,430 Australian based suppliers. Our supply chain is key to completing our projects to the standards required by our clients. Pensar has taken steps to communicate with our suppliers about ethically sourcing responsible products and services and in doing so, collectively improving the modern slavery landscape.

## 6. Governance Process



## 7. Our Policies and Procedures

The development of a Modern Slavery Policy was Pensar’s goal to mark the submission of our first statement. This policy has been drafted and will be presented to the board for review and approval in April 2021. A procedure is also under development to ensure transparency, and enable compliance in the auditing process.

## 8. Potential Risks in our Operations and Supply Chains

### Potential Risks in our Operations

We currently operate and perform services for our clients in Australia and believe that we have a low operational risk of exposure to modern slavery activities. Our Equal Opportunity, Discrimination and Harassment Policy, and Ethics and Code of Conduct, ensure we conduct our operations as they relate to human rights, and in accordance with the law.

Another key aspect of our operations that directly affect our employees, local community, or environment; and one that we are extremely proud of is our safety record. Using our certified integrated management system, we ensure all employees, suppliers and subcontractors operate with our quality, environmental and safety objectives in mind.

### Potential Risks in our Supply Chains

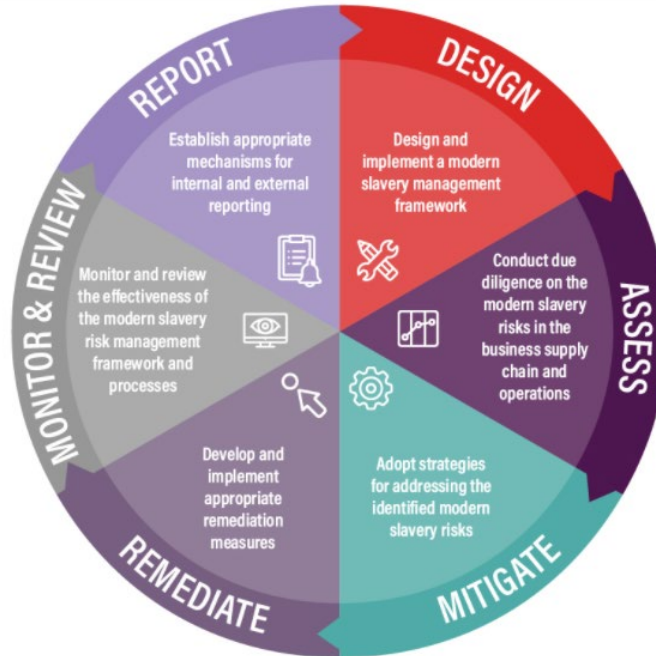
In 2020, we reviewed our supply chain based on expenditure for the previous financial year (2019/2020). All suppliers with an expenditure > \$250k were surveyed and asked specific questions relating to their understanding and knowledge of modern slavery in relation to their own operations and supply chain. In addition to the survey, suppliers were also provided with a copy of Pensar’s Supplier Code of Conduct. Approximately 50% of surveys were completed and returned. Pensar recognises this rate of response is far from ideal but also acknowledges that for many suppliers this was unfamiliar territory.

Based on the responses received from our suppliers and having regard to the type of products we typically procure; we are not aware of any instances of modern slavery within our supply chain. We do believe however that our level of exposure to modern slavery would increase as we track further down the supply chain into the respective countries where goods are manufactured.

In Australia, we have identified that the cleaning contractors that have been engaged to clean our premises operate in an industry that may be at risk of migrant labour exploitation.

## 9. Addressing the risk of modern slavery practices

Pensar is committed to following the instruction wheel below to deliver best practice in modern slavery compliance.



## 10. Moving Forward

Pensar will continue to adopt strategies to mitigate our risk through the following processes:

- Supply chain mapping - identify significant areas of modern slavery risk in the deeper tiers of Pensar's supply chain.
- Adopt a prequalification process for suppliers and subcontractor which is robust to ensure Modern Slavery Act compliance. This will be implemented during the on-boarding process.
- Pensar Modern Slavery Working Group and monthly progress reporting at board meetings will be conducted for continuous monitoring and improvement.

This statement is approved by the Pensar Board of Directors

Karl Yunker  
Managing Director

30<sup>th</sup> March 2021