

# MODERN SLAVERY STATEMENT

WARD CIVIL & ENVIRONMENTAL ENGINEERING

**SYDNEY**



**NEWCASTLE**



**BRISBANE**

# MODERN SLAVERY STATEMENT

This Statement is made pursuant of the Modern Slavery Reporting Requirements of the Australian Modern Slavery Act 2018 (Cth).

## REPORTING ENTITY

This Modern Slavery Statement (Statement) is made by the reporting entity Ward Civil & Environmental Engineering Pty Ltd (ABN 65 098 942 459) (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 2025.

This Statement has been approved by the Board of Ward and signed by David McPadden, Chief Executive Officer.

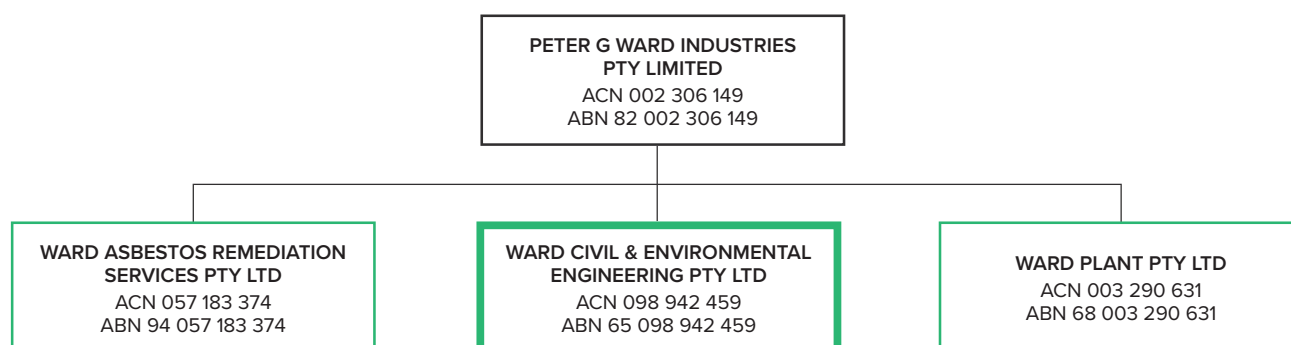
This Statement includes the entities cited which form part of the Ward group. None of the group entities are themselves reporting entities.

## STRUCTURE, OPERATIONS AND SUPPLY CHAIN

### Structure

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

Company structure:





## 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 full-time employees include a combination of permanent staff and project-based personnel. Permanent, full-time employees are usually fewer than 150 employees but with several large projects underway, the number of employees may exceed 150.

## Supply Chain

Ward's supply chain consists of the services (including labour), supplies, materials and products contributing to Ward's own civil works and services.

The supply chain directly engaged by Ward includes:

- 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 (formwork, reinforcement steel, concrete supply, and placement)
  - ii) Utilities work including water supply and mains, stormwater and sewer (including valves, pits, and control arrays), electricity supply works (including high and low voltage), data and communications cable installation (including 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. Where project clients and specifications require importation (typically 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.

## **RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAIN**

The risks of modern slavery in Ward's operations and supply chain is low. The main risks of modern slavery in the operations and supply chain is economic exploitation through underpayment in relation to:

- a) Non-payment or underpayment of employee entitlements and of 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 and of migrant workers or other vulnerable persons by labour hire organisations

## **ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS**

A review of modern slavery risks was undertaken by Ward's management and procurement teams.

Ward's processes, procedures, and forms to address modern slavery risks in its business operations include:

- a) **Ward's contracts require subcontractors to produce statutory declarations that all employee entitlements are paid**

Non-payment and underpayment of wage entitlements in the construction sector is highly regulated in all Australian jurisdictions and provides a strong protection against modern slavery practices. Ward currently has operations in NSW and Queensland. Both states require each contractor entity (including all lower tier subcontractors) submitting a claim for payment for construction work, to submit an accompanying statutory declaration that all wages and other entitlements of workers who have performed the work, have been paid.

- b) **Using formal labour hire agreements with service providers**

Ward engages service providers to provide labour hire workers to Ward under formal terms requiring compliance with all applicable employment laws. This includes payment of wage 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 risks of modern slavery practices within Ward's product supply chain.

- d) **Issuing major suppliers with a modern slavery questionnaire**

Ward identifies its main suppliers of products and requests those suppliers complete a questionnaire to identify modern slavery risks. Any high-risk indicators or anomalies are pursued.

- e) **Community Information Hotline**

Ward has established a 24hr project enquiries and complaints hotline. Anyone, including employees, subcontractors and members of the public, can call the hotline to lodge concerns regarding any matters relating to Ward's projects including 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 and remedy the occurrence.



**f) Surveys**

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

**g) Training**

Ward provides a targeted training program to ensure that the key stakeholders are educated in best practice and industry standards. The program includes core contract law principles and practice within the business culture of Ward.

The course focuses on compliance requirements and standard contract forms and processes. Content includes compliance with laws addressing modern slavery, and Ward's obligation to be vigilant and apply risk management judgement, should a specific jobsite or project scope require procurement at a higher or different risk level 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.

## **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. No reporting consultation is required amongst the group entities. This is not a joint statement. The group entities adopt the same actions, assessments, forms, processes and attend the same corporate training program.



DAVID MCPADDEN

**CHIEF EXECUTIVE OFFICER**



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