

A black and white photograph of a large-scale construction or demolition site. In the foreground, a large front loader is positioned on a pile of rubble. In the middle ground, an excavator is working on a steep, rocky embankment. To the right, a truck is spraying water from a high-pressure hose. The background shows a line of trees and some distant buildings under a cloudy sky.

# 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 2024.

This Statement has been approved by the Board of Ward and signed by the Chief Executive Officer and Acting General Manager – Corporate Services.

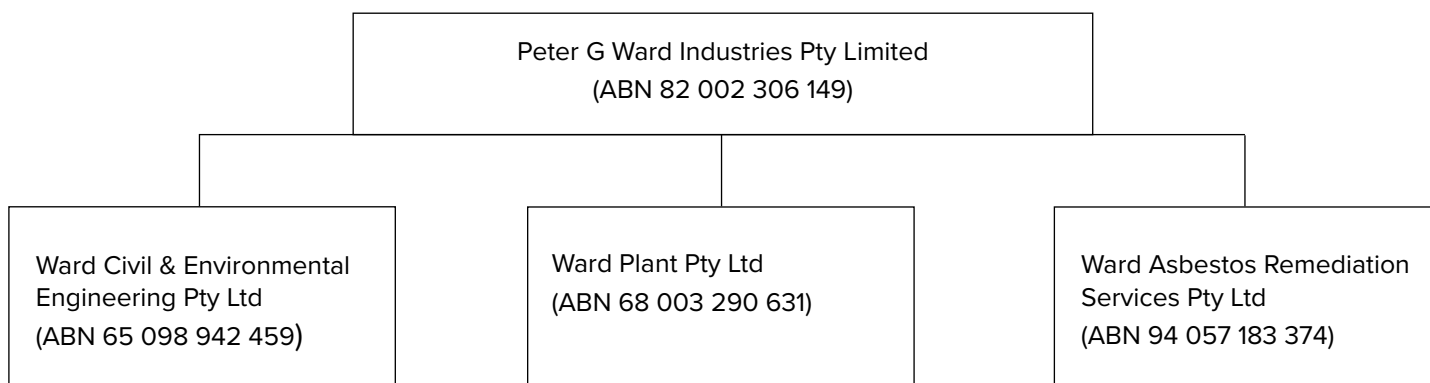
This Statement includes the entities cited which form part of the Ward group. None of the group entities are themselves reporting entities.

## 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:

- Subcontractors for major works packages, including works to be performed by several lower tier subcontractors
- Non-payment or underpayment of employee entitlements and of migrant workers or other vulnerable persons by labour hire organisations





# MODERN SLAVERY STATEMENT //

- 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 organisation

## ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

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

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
- 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.

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## g) Training

Ward provides in-house training under a 'Promise Makers, Promise Keepers' program of lectures/ interactive workshops. 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 ITS ACTIONS

Ward acknowledges it is difficult to assess the effectiveness of measures taken to date because:

- a) Ward is unaware of any complaint or issue of concern about its compliance with modern slavery laws<sup>1</sup>
- b) Ward's recent growth triggering its requirement to lodge a Statement, means its actions will be assessed for their effectiveness in the following Statement period

## 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.



Julia Ward

**Chief Executive Officer**



Peter Wiczorkowski

**Acting General Manager – Corporate Services**

Ward acknowledges Traditional Owners of Country throughout Australia and recognises the continuing connections to lands, waters and communities. We pay our respect to Aboriginal and Torres Strait Islander cultures and to Elders past and present.

<sup>1</sup> Modern Slavery Act 2018 (NSW) and the Modern Slavery Act 2018 (Cth) as in force and updated from time to time.



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