



1. MODERN SLAVERY STATEMENT OVERVIEW – 2023

We are pleased to present our second annual Modern Slavery Statement, In accordance with the *Modern Slavery Act 2018*, this statement outlines the steps that Shamrock Civil Engineering has taken, and is continuing to take, to assess and reduce risks of modern slavery within our business and our supply chain, and our plans for review and improvement.

This statement was reviewed and approved by the Board of Directors of Shamrock Civil Engineering at a meeting held in our offices in Carole Park Qld 4300 on the 3rd June 2024

This statement is signed by Andrew Kerr Chief Executive Officer of Shamrock Civil Engineering Pty Ltd on the 3rd June 2024

Signed

Andrew Kerr
CEO Shamrock Civil Engineering

Shamrock Civil Engineering Pty Ltd

ABN 68 066 655 856



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2. INTRODUCTION

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Shamrock Civil Engineering recognises that it has a responsibility under the Modern Slavery Act to take a strong approach to reject any forms of modern slavery and human trafficking. We are committed to promoting ethical business practices and policies that protect workers from being abused and exploited, both in our own business and our supply chain.

Shamrock Civil Engineering is committed to limiting the risk of modern slavery occurring in our business, ensuring there is transparency in our business and in our approach to addressing modern slavery throughout our supply chain.

3. OVERVIEW OF OUR BUSINESS & REPORTING ENTITIES IDENTITY

The entity providing this statement is Shamrock Civil Engineering Pty Ltd (ABN 68 066 655 856) our head office is located at 195 Cobalt Street, Carole Park, Qld 4300 Telephone (07) 3727 1100.

Shamrock Civil Engineering is a mid-tier national civil engineering contractor providing civil engineering services to the Defence, Resources, Landfill, Government and private sectors.

We were formed in 1994 and from humble beginnings have grown to be a respected civil contractor with a demonstrated capability of delivering projects across Australia.

Our head office is based in Carole Park in Qld with regional offices in Townsville, Rockhampton, Melbourne, Adelaide, and Darwin. We have approximately 180 employees and 180 items of heavy plant and equipment.

Shamrock Building Pty Ltd (ABN 639 694 885) is a wholly owned subsidiary of Shamrock Civil Engineering Pty Ltd and this statement is prepared on behalf of this entity also, which share systems procedures and management with Shamrock Civil Engineering.

Further to the requirements of 16(1)(f), as we owned and controlled another entity during this reporting period we met with this entity to frame our expectations, raise awareness and understand their approach in mitigating modern slavery risks.

As there is shared common senior executives between Shamrock Civil Engineering Pty Ltd and Shamrock Building Pty Ltd the entities jointly contributed to the development of the statement.

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4. INFORMATION ON OUR OPERATIONS AND POLICIES

Shamrock Civil Engineering is a privately owned company with an approximate \$200m turnover, we predominately provide contracting services for the Department of Defence, Resources, Landfill, Government and private sectors.

During this reporting period, our operations extended to most forms of traditional civil construction, and we operated in Queensland, New South Wales, Victoria, South Australia and the Northern Territory Our company is managed by a Board of Directors with regional operations managers in each region.

We have again identified modern slavery risks in areas such as the supply chain and workforce.

As per our previous statement we do not believe we hold a modern slavery risk in the finance and banking areas or the wealth and investment areas.

We have relevant policies in relation to modern slavey, code of conduct and whistle blowing, which are attached to this statement and which were reviewed and amended during the reporting period.

To service our operations, we continue to require a large supply chain which is predominately locally based in Australia. Many of the goods and services we procure are in the form of plant and labour services from supply chain partners. The balance of our procurement are materials which are typically found and utilised in civil construction projects with a limited number of international procurements.

We procure the goods and services needed for our business's day-to-day operations from many contracted and preferred suppliers operating in Australia. Our supply chain arrangements include suppliers under the following arrangements,

a. Materials under Purchase Order Engagements

Typically for the provisions of materials and goods related to civil construction, the predominate items would include quarry products, stormwater products and precast concrete products. These items are of low risk as they are produced (including the raw materials) and manufactured in Australia, by companies subject to Australia laws and regulations.

We do identify a Modern Slavery risk with regard to imported materials and actively manage and mitigate this risk primarily by the inclusion of Modern Slavery requirements in our terms and conditions of engagement.

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b. Plant and Labour Hire Engagements

We procure labour (from licensed labour hire providers) and plant via plant and labour hire arrangements. This typically takes place to supplement our existing internal resources and when we perform remote works away from our regional hubs.

These items are low risk as the workforce is engaged locally in Australia and are subject to local workplace regulations and Industrial laws.

c. Major and Minor Subcontracts

We engage specialist subcontractors to performed works on a subcontract basis, this may include the provision of materials as part of these scope of works.

We have long-term strategic relationships with key suppliers and subcontractors, this provides reliability and stability in our supply chain and procurement processes.

We do identify a risk with modern slavery with subcontractors who are required to procure materials from overseas as part of their scope of works. We have undertaken a review of the Global Slavery Index which has provided us with an understanding of some of the industry risks that we are susceptible to, in particular in the supply chains where materials are sourced from countries where people are vulnerable to modern slavery practices.

Whilst we generally (99%+) source materials locally within Australia, in many instances we procure from the local distributor or importers. It is often the case that this supplier is the importer of materials into Australia and in many instances we have little to no visibility into the labour practices of their tier two and below suppliers.

Shamrock Civil Engineering mitigate this risk by the inclusion of Modern Slavery requirements in our terms of engagement, however we have limited visibility regarding the application of these requirements down lower tier supply chains.

We see this as a general industry risk that is also specific to our operations, we hope to play our part in reducing this risk by in the future focusing on due diligence inquiries on a number of our key suppliers.

In the previous reporting period, we stated that we intend to develop a list of the balance of suppliers who import their products from overseas. This work is still currently ongoing, and we are still assessing the best means of due diligence on our supply chain.

When this is complete it will allow us to map our key suppliers whose supply chains may include a country that has a Modern Slavery risk. We can then undertake a process of due diligence and consultation with these suppliers to validate their processes with respect to Modern Slavery and over time be able to categories our suppliers into high , medium and low risk categories.

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5. ACTIONS THAT HAVE BEEN TAKEN TO ADDRESS MODERN SLAVERY RISKS

To address modern slavery risk all forms of engagements (Subcontract and PO's) include a modern slavery mitigation obligation contained within the contractual conditions, we are now also vetting our supply chain partners and working on more formalised systems of assessment for our supply chain partners.

6. IDENTIFYING RISKS OF MODERN SLAVERY & ASSESSMENT OF THE EFFECTIVENESS OF RISK MITIGATION

During the reporting period, Shamrock Civil Engineering undertook a high-level risk assessment of some of our key suppliers of goods and services.

Our forms of engagement, Purchase Orders, Major Subcontracts, and Minor Subcontracts were reviewed and upgraded to include obligations regarding Modern Slavery requirements. The findings of our high-level risk assessment were as follows,

a. Our self-performed operations

This review is unchanged to the previous reporting period, we believe there is limited to no risk to our internal labour force operations, all of our labour is locally sourced either internally or from licensed labour hire providers. The local conditions are regulated ensuring best practices are adhered to. We have an internal HR department which manages all employee issues.

b. Our supply chain

The vast majority of our supply chain are locally based in Australia. In our opinion there is a lower risk of modern slavery issues as they are required to comply with the local requirements.

Additionally, many of these organisations are large in scale and have sophisticated processes and procedures in place to adhere to relevant requirements.

We have however identified a risk associated with materials sourced from overseas. Whilst Shamrock Civil Engineering do not generally source materials from overseas, materials may be supplied indirectly via our supply chain.

As such we have in recent years upgraded our forms of engagements such as PO's and subcontracts to identify the obligations our supply chain partners are required to achieve with respect to Modern Slavery.

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The key item that we source indirectly from overseas is geosynthetic lining materials. We have a long-standing relationship with the subcontractors in this area which mitigates risk and allows us to understand the supply chains.

7. OUR GOVERNANCE & OUR FUTURE COMMITMENT TO REDUCE MODERN SLAVERY RISKS

Shamrock Civil Engineering has a robust corporate governance framework with respect to Modern slavery risk. We regularly review our policies and procurement procedures to mitigate against the risk of modern slavery occurring. In recent months our clients have undertaken Modern Slavery audits as part of their due diligence on Shamrock Civil Engineering.

We are currently working on integrating the findings of these audits into our policies, procedures and process. Some of these findings have resulted in a review to our Modern Slavery statement, Supplier Code of Conduct and Whistleblower policy, the latest version of each is attached to this statement.

In addition to external audits, internally we undertake the following activities;

- We have developed and published a Modern Slavery Policy. This policy is reviewed annually.

This action was completed during the reporting period.

- We have developed and published a Code of Conduct Policy. This is reviewed annually. This action was completed during the reporting period
- Our tender and procurement processes are reviewed to ensure our supply chain are aware of its requirement in respect to Modern Slavery.
- We review our forms of engagement such as our Purchase Orders, Subcontractors (Major and Minor) to include contractual obligations to address modern slavery compliance. Suppliers both new and existing are engaged under these terms.
- This action is underway, our forms of engagement are currently with our lawyers for a refresh and is due to be complete in early January 2024.

Shamrock Civil Engineering have a modern slavery policy in place, this will be continued to be reviewed to ensure that adequate processes are in place to meet our modern slavery compliance requirements.

In addition, Shamrock Civil Engineering have conducted reviews of policies, such as, our Supplier Code of Conduct and Whistle-blower, to ensure inclusion of modern slavery clauses to increase employee awareness of the risks of modern slavery in our business and our supply chain.

In the coming years we aim to include more substantive information regarding modern slavery and modern slavery risk into our employee handbooks and induction materials.

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These actions were performed during the reporting period and will continue to be performed in future reporting periods.

We also are continuing to investigate more sophisticated subcontractor and supplier selection criteria with additional Modern Slavery questionnaires.

8. ASSESSMENT OF THE EFFECTIVENESS OF ACTIONS TAKEN

This is the second year that Shamrock Civil Engineering has submitted a Modern Slavery Statement and we have made substantial progress in Modern Slavery risk reduction. .

This is primarily evident from suppliers and subcontractor now having visibility to the appreciation Shamrock Civil Engineering have for the mitigation of Modern Slavery risk through the introduction of Modern Slavery requirements in their forms of engagement which has enabled Shamrock Civil Engineering.

We are still establishing a line of responsibility and accountability within the business for the management of our Modern Slavery programme.

We will be reviewing the information available both in the Global Index and the Modern Slavery Register to develop an appropriate framework for tracking and assessing the effectiveness of our actions.

We advise we have provided information for the seven mandatory reporting criteria as follows;

1. The reporting entity's identity - Refer Section 3
2. The reporting entity's operations, structure, and supply chains – Refer Section 4
3. An assessment of the entity's modern slavery risks of modern slavery practices in its operations and supply chains and those of any entities which the reporting entity controls or owns – Refer Section 4, 5 & 6
4. Any actions that have been taken to assess and mitigate modern slavery risks in the reporting entity and entities it controls or owns Refer Section 5, 6 & 7
5. Information on how the reporting entity has been assessing the effectiveness of its modern slavery risk reduction actions Refer Section 8
6. Information on the consultation process undertaken by the reporting entity with any entities that it controls or owns or with which it is issuing a joint statement – Refer Item 3
7. Any further relevant information – Various Sections

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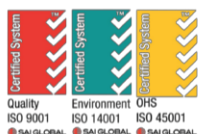
This is Shamrock Civil Engineering's second modern slavery statement, in line with Government expectations that it will take three to five years for companies to develop and implement new strategies for managing supply chain risks, we at Shamrock Civil Engineering are constantly reviewing our systems and procedures to mitigate against modern slavery risks in our business and supply chain.

We intend that future modern slavery statements will continue to incorporate details on these developments and our evolution.

We welcome any queries or feedbacks on Modern Slavery Statement, feedback and queries can be directed to either the HR Manager or Commercial Manager at (07) 3727 1100 or reception@shamrockcivil.com.au

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