

2023

# MODERN SLAVERY STATEMENT



UON Pty Ltd - ABN 44 099 963 354



## 1. ABOUT THIS STATEMENT

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This Statement is made under the Australian Modern Slavery Act 2018 Cth for the reporting period ending 31st March 2024 and is published on behalf of UON Pty Ltd (ACN 099 963 354).

This Modern Slavery Statement details the steps it has taken to assess modern slavery risks within its operations, inclusive of its supply chain and the actions being taken to help manage these risks.

Modern slavery is the severe exploitation of people for personal or commercial gain. Modern slavery is a major violation of human rights and covers serious crimes, including the following eight types of exploitation: human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services.

UON does not accept any form of modern slavery in its business operations or supply chain and is committed to cultivating a sustainable future and preventing human rights abuse.

This Statement was approved by the Executive Chairperson of UON on 21/12/2023.

## 2. OUR COMPANY

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UON's core business is the supply, installation and hire of power generation and water solutions, and ancillary equipment. The company operates within Western Australia and has their head office in Malaga, WA.

With business relationships central to the ongoing success of our business, UON establishes trust and integrity with all our suppliers. Our supplier selection can include due diligence to investigate the suppliers' reputation, compliance with workplace health, safety and environment standards and business references.

UON carries out due diligence checks for new suppliers during on-boarding and with existing suppliers against the following measures;

### UON's Vision

Creating sustainable  
business, by  
delivering energy for  
every future.

- Assessing risks in the provision of good and services.
- Anonymous reporting for suspected breaches.
- Requesting more information from suppliers about their health and safety standards, and employment conditions.
- Requiring improvements to substandard practices.
- Sanctioning suppliers that fail to improve their performance in line with our requirements.

At UON, we have a zero-tolerance approach to modern slavery and are committed to keeping our suppliers accountable to prevent slavery and human trafficking in our operations and supply chain. Supply chain risks will be investigated as part of our ongoing continuous improvement measures.

UON are committed to operating our business lawfully and ethically, and in only working with suppliers locally and globally who demonstrate their alignment with UON company values. We hold our suppliers accountable to work with us to tackle modern day slavery and prohibit human slavery and slavery like practices, human trafficking, and child labour.

With more than 400 employees and contractors, UON ensures all employees are engaged either by contract or in accordance with award agreements.

We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection and staff inclusion and diversity.





### **3. OUR SUPPLY CHAIN**

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UON's supply chain includes the purchase of consumables, inventory and products and services needed for the businesses day-to-day operations, including equipment, office supplies, personnel and training of staff, occupancy costs, IT costs, support services and travel.

UON works with suppliers and others to enable long-term benefits in the locations we operate.

In the short term, UON will look to identify priority areas for training and continuous improvement. We are looking at ways we can set clear expectations for employees and suppliers to be alert to possible modern slavery risks and take measures to address these risks.

Approximately 95% of UON's expenditure was made within Australia, and the remainder was primarily spent overseas in China.

The majority of our suppliers are located in Australia; however, we recognise that our suppliers' source products are from elsewhere, which presents potential modern slavery risks deeper within UON's supply chain.

We continue to monitor and evaluate our performance in this space for future development. Future measures aim to assess potential modern slavery risks in our operations and supply chains with emphasis on high-risk geographical locations and business transactions.

UON are committed to developing and reviewing company policies, procedures and risk assessment tools for modern slavery in operations and supply chains.

UON are considering adding a modern slavery clause into all our supply contracts and will review our modern slavery risk assessment measures and mitigation responses over time to ensure best practice.

### **4. OUR APPROACH TO MANAGING MODERN SLAVERY**

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Given the prevalence of modern slavery globally, UON acknowledges that modern slavery practices may be present in its supply chains.

This potential risk is recognised throughout UON, starting with the Board.

A key pillar in our sustainability aspiration is our commitment to respecting human rights. This commitment is operationalised by UON's company policies and procedures. During the year, UON developed a suite of policies and procedures, which sets out UON's approach to managing modern slavery risks in its operations and supply chains.

The policies and procedures helping to operationalise UON's commitment to managing modern slavery include:

#### **4.1 MODERN SLAVERY PROCEDURE**

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UON is committed to ensuring our compliance with Australian and international laws and regulations in the areas in which we operate. We demonstrate our commitment by addressing modern slavery in all its forms and promoting awareness of concerns surrounding modern slavery to our employees and suppliers.

#### **4.2 ANTI-BRIBERY AND CORRUPTION POLICY**

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All UON personnel are encouraged to immediately report any concerns about bribery and corruption. Personnel who wish to raise a concern or report another's wrongdoing, or who have refused pressure to either accept or offer a bribe, should not be worried about possible repercussions. UON encourages openness and will support anyone who raises genuine concerns in good faith under this policy.

#### 4.3 CODE OF CONDUCT

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At UON we are committed to fostering and maintaining high standards of conduct and professionalism in our team, both in performance of work and our interactions with the wider community. UON's code of conduct outlines the behaviour that we expect as an organisation and provides guidance on the principles, practices and standards of behaviour required by the UON team.

#### 4.4 RECRUITMENT & ONBOARDING PROCEDURE

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Our recruitment and onboarding procedure outlines a fair and transparent process which is compliant with legislative requirements including ensuring all employees are eligible to work in Australia and being safeguarded against slavery and human trafficking. This procedure is supported by the below additional procedures:

- Equal Opportunity, Diversity & Inclusion Procedure
- Vendor Management procedure Awards and collective agreements
- Behaviours Guideline

#### 4.5 PRIVACY POLICY

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UON is committed to ensuring privacy of personal information is conducted in accordance with the National Privacy Principles and any other relevant legislation and UON standards.

#### 4.6 GRIEVANCE RESOLUTION PROCEDURE

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UON endeavours to provide a fair and equal working environment, by ensuring employees have access to processes for the resolution of personal grievances. We encourage staff to come forward with personal grievances and ensure every attempt is made to resolve the matter at the workplace level through discussion, negotiation, and conciliation in a supportive manner, without victimisation or intimidation of any person connected with the grievance.

#### 4.7 VENDOR MANAGEMENT PROCEDURE

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The Vendor Management procedure is to provide a system of instructions and assignment of responsibility for the risk assessment and management of UON vendors (or "suppliers"). This process ensures the Company continues to focus on identifying and addressing potential modern slavery risks within our direct supply chain.

#### 4.8 WHISTLEBLOWER PROCEDURE

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Our Whistleblower procedure assists in creating a culture within UON that encourages our people to speak up and raise breaches of internal rules or policy or disclosable conduct relating to the company, its branches, employees, contractors or suppliers.





## 5. KEY ACTIONS TO ASSESSING MODERN SLAVERY RISKS

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Key actions that UON undertook during this reporting period included assessing our modern slavery risks in our supply chain.

Following the assessment of our supply chain, UON has developed a Modern Slavery framework that includes a Modern Slavery Procedure, Anti-Bribery and Corruption Policy, UON Code of Conduct, Supplier Code of Conduct, Whistleblower Procedure, Vendor Management Procedure.

This framework sets out specific actions to further understand, respond to and manage human rights and modern slavery risks within UON's operations and supply chain. This framework and the relevant documents above were implemented effective 1 July 2023. UON's Human Rights and Modern Slavery framework for supply chain management includes the following processes:

- **Control the Environment** - Values, Behaviour Guide, Policy, Procedures and Governance.
- **Risk Identification and Assessment** - Identifying and assessing modern slavery risks relevant to UON operations.
- **Risk Management and Control Activities** - Managing and controlling modern slavery risks in UON's operations.
- **Information and Communication** - Providing information, education and awareness to employees, suppliers, clients, and other stakeholders.
- **Monitoring and Reporting** - Assurance, reporting, and continuous improvement.

The framework is designed to be rolled out over the next twelve months and to drive continuous improvement in UON's capacity to manage modern slavery risks in its operations and supply chain.

## 6. MANAGING MODERN SLAVERY RISKS - A LOOK FORWARD

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Additional actions relating to enhancing UON's response to modern slavery will include:

### 6.1 GOVERNANCE

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- Review and enhance existing policies and code of conduct to ensure clear and standardised commitment and approach to business ethics, including modern slavery.

### 6.2 PERSONNEL TRAINING AND RISK MANAGEMENT

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- Provide ongoing training to relevant personnel to understand modern slavery risks within our supply chain and operations.

### 6.3 PROCUREMENT

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- The ongoing rollout of the UON Modern Slavery framework and process across the business.
- The rollout of the UON Code of Conduct and Supplier Code of Conduct to all UON suppliers.
- Ongoing review of procurement practices to ensure they align with the UON modern slavery commitments.
- Ongoing risk assessment of suppliers, with a particular focus on those considered high risk from a modern slavery perspective.
- Engage with suppliers, mainly those considered high risk from a modern slavery perspective, to raise awareness and improve in relation to modern slavery.
- Mapping our supply chain to improve understanding of potential areas of modern slavery risks.
- Develop an audit program for our high-risk suppliers for compliance with modern slavery.



## 7. CONSULTATION

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UON do not own or control any other entities therefore consultation is not required.

## 8. APPROVAL

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UON is committed to managing modern slavery risks in accordance with this statement.

UON recognises that the risks of modern slavery are complex and evolving and will continue to work to address these risks. This will involve actively engaging with suppliers to assess the effectiveness of the identified actions to continually enhance the approach to supply chain management.

This statement was approved by the Board of UON in their capacity as principal governing body of UON on 21 December 2023.

A handwritten signature in black ink, appearing to be 'Mark Keogh'.

Mark Keogh  
Executive Chair  
UON Pty Ltd