



08 9729 2922



www.dwyereng.com.au



16-22 Spencer Street, Harvey WA 6220



PO Box 509, Harvey, WA 6220



MODERN SLAVERY STATEMENT

01 January 2024 to 31 December 2024

Dwyer is a private and independent Australian company. The office is located in Harvey, Western Australia. Operating since 1999 and being 100% Western Australian owned, this family oriented company has a strong focus on personnel safety and encourages a positive culture within the company.

Our approach to Modern Slavery is underpinned by our commitment to strengthening our approach to preventing modern slavery practices and efforts to better assess and manage this risk. By taking a targeted approach and focusing on specific high risk sectors we believe we are setting a strong foundation not only across our areas of operations or supply chains, but for the future.

The Commonwealth of Australia Modern Slavery Act (2018) has defined eight forms of serious exploitation:

1. Trafficking in persons
2. Slavery
3. Servitude
4. Forced marriage
5. Forced labour
6. Debt bondage
7. Deceptive recruiting for labour or services
8. The worst forms of child labour - where children are subjected to slavery, similar practices, or engaged in hazardous work.

Dwyer is committed to identifying and addressing our modern slavery risk, and to maintain responsible and transparent supply chains.

IDENTIFYING THE RISKS OF MODERN SLAVERY PRACTISES

Risk Assessment

During the reporting period, we conducted a risk screen of all our suppliers based on their geographic location and the industry they work in. With 100% of our suppliers based in Australia, our overall supply chain risk rating was low; however, based on industry classification, 16% of our suppliers were considered medium risk.

This enables us to identify and consider risks that may possibly cause or contribute to modern slavery practices together with the type of industry and type of products and services being supplied. The outcome of the assessment assisted with our prioritisation and implementation of our supplier engagement.



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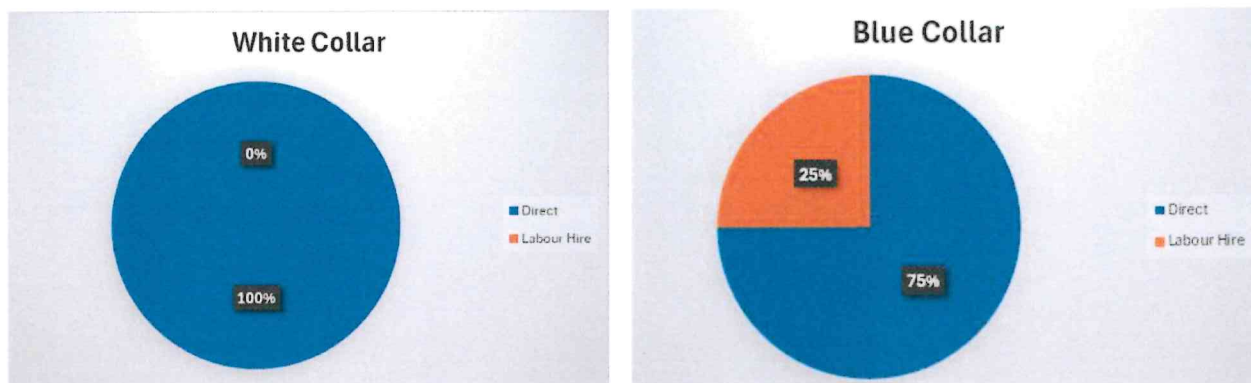
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Potential risks of Modern Slavery Practices in Operations

The majority of Dwyers workforce are directly employed and on an employment contract which meets the applicable employment legislation. The direct engagement therefore will reduce the modern slavery risks.

The following graphs demonstrate Dwyer's workforce:



All staff within Dwyer are expected to comply with all laws and act in accordance with regulations. A training module on modern slavery forms part of the Induction undertaken by new employees. Dwyer are committed to ensuring that 100% of employees have completed the induction before commencement of work. Should any of our employees need any additional information or support regarding human trafficking, forced labour, servitude, and slavery this will be provided.

Dwyer Engineering has conducted pre-qualification assessments on the labour hire companies it engages to ensure appropriate work rights and pay rates are in place for all workers, Dwyer has less direct visibility and control over these workers and their employment terms. Dwyer recognises there are potential modern slavery issues within the third-party labour arrangements, which may include excessive working hours, underpayment or non-payment.

Potential risks of Modern Slavery Practices in Supply Chains

Dwyer endeavours to procure all materials and consumables for its projects locally with all of Dwyer Engineering procurement spend in the financial year ending 2024 in Australia. Dwyer Engineering has developed strong long-term relationships with its suppliers in order to ensure quality, consistency and reliability of supply.

The likelihood of modern Slavery in supply chains is low and lies in the suppliers or subcontractors' non-compliance with Dwyer's policies and standards, including excessive overtime and migrant labour exploitation.



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Supply Chain Assessment

The main types of goods and services procured by Dwyer Engineering is steel. The majority of steel is sourced from Australian mills with the balance originating from mills in China, South Korea, the United Arab Emirates, Thailand, New Zealand and Indonesia.

ACTIONS TAKEN FOR IDENTIFIED RISKS

Staff Training and Development

We will provide training to our team members about modern slavery to help them understand what it is, the risks associated with it that we have identified, and the actions that can be taken to mitigate those risks.

Supplier Engagement

Contractually requiring our subcontractors and suppliers to take reasonable steps to identify and address modern slavery risks. Supplier assessments to ensure they also adhere to our ethical standards and practises. Implemented a section in supplier onboarding process to gather information on our suppliers anti-slavery policy.

Engaging further certification schemes and audits

Dwyer Engineering engages frequent auditors to ensure its compliance with industry standards, including:

- ISO 9001
- ISO 45001
- ISO 14001
- Steel Sustainability Australia

IMPROVEMENT APPORACH

Dwyer will assess the effectiveness of the actions taken to address the potential risk of Modern Slavery by conducting an annual management meeting to review our response to modern slavery and progress against the specific steps/actions we have taken to assess modern slavery risks and report on open, outstanding and complete actions.

Similarly, we will work with suppliers to review how they have progressed and any actions they have put in place to address modern slavery risks.

Dwyer has policies in place which promote legal and ethical business conduct. These are reviewed yearly and receive management approval.

ASSESS THE EFFECTIVENESS OF ACTIONS

This is the second Modern Slavery Statement for Dwyer Engineering and the Company is in the process of implementing procedures to further identify and address modern slavery risks within its operations and supply chain.



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Dwyer's focus was to gain a better understanding of our modern slavery risks and how such risks may be present in our operations and supply chains. We have commenced to assess the effectiveness of measures and will continue to work on processes to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains.

Dwyer Engineering is committed to reviewing the effectiveness of its actions by:

1. An annual review of modern slavery processes with the management team to ensure all relevant risks have been considered/and or incorporated;
2. An annual review of company communications and training related to modern slavery and human rights;
3. An annual review to ensure our employees are being paid appropriately for their work and at a minimum in line with legal minimum wage;
4. Assessment of our processes to ensure they are up to date with current knowledge and best practice;
5. Number of instances of modern slavery recorded and subsequent outcomes.

Dwyer Engineering has not been notified of and is not aware of any modern slavery complaints against its operations and supply chains prior to or during 2024.

CONSULTATION AND APPROVAL

This statement has been prepared by Dwyer Engineering Management team in consultation with our HR and Safety Team. This team is responsible for overseeing our modern slavery policy and procedures and reviewing them annually to ensure they continue to evolve.

This statement was approved by the principal governing body of Dwyer Engineering and Construction on 06th May 2025.

We do not own or control any other entities

Joe Dwyer
Managing Director
Dwyer Engineering and Construction Pty Ltd