

JOINT MODERN SLAVERY STATEMENT 2020



CONTENTS

	PAGE #
INTRODUCTION & JOINT STATEMENT	2
STRUCTURE	3
OPERATIONS	3
GLOBAL & DOMESTIC SUPPLY CHAINS	5
MODERN SLAVERY RISK ASSESSMENT	7
PRODUCT, SERVICE & GEOGRAPHIC RISKS	8
DELTA GROUP SUPPLY CHAINS SURVEY	9
DELTA GROUP RISK PROFILE	10
OPERATIONAL RISK	11
SUPPLY CHAINS RISK	12
CONSULTATION WITH CONTROLLED ENTITIES	15
KEY ACTIONS	16
GOVERNANCE & POLICY	18
SUPPLY CHAINS	19
MONITORING & COMPLIANCE	20
TRACKING & MEASUREMENT	22
MANDATORY REPORTING CRITERIA	23
DELTA GROUP MANAGEMENT STRUCTURE	23
PLANT & EQUIPMENT	24

Delta Group acknowledges the Traditional Owners of the land upon which we work across Australia. We recognise their living cultural and natural landscapes and pay our respects to Elders past, present and emerging.

We strive to maintain a workplace that fosters acceptance and respect for diversity. A workplace free of discrimination, harassment and violence in any form. We promote and seek to achieve equality throughout our business and all related entities.

INTRODUCTION

As reporting entities under the Commonwealth Modern Slavery Act 2018, Delta Group Holdings Pty Ltd and Delta Pty Ltd are bound to publish a Modern Slavery Statement for the financial year ending 30 June 2020.

Delta Group Holdings Pty Ltd is a common holding company incorporating the following related entities under common control:

- + Delta Pty Ltd (*Joint Reporting Entity*)
- + Delta Recycling Pty Ltd
- + Delta Rent Pty Ltd
- + CMA Contracting Pty Ltd
- + Whelan the Wrecker Pty Ltd
- + Clifton Grange Pty Ltd

JOINT STATEMENT

In accordance with the Act Delta Group Holdings Pty Ltd and Delta Pty Ltd ('Delta Group') have chosen to publish a Joint Modern Slavery Statement. In doing so we have ensured full compliance with the Act.

Our Joint Statement has been prepared in consultation with each reporting entity as well as each related entity under common control. We have addressed all of the mandatory reporting criteria and received the approval of our Principal Governing Body, on behalf of each reporting entity.

This Joint Statement was approved by Con Petropoulos; Sole Director of Delta Group Holdings Pty Ltd as the parent entity of Delta Pty Ltd on 23 December 2020.



Con Petropoulos
DIRECTOR
DELTA GROUP HOLDINGS PTY LTD
23 December 2020

STRUCTURE

Delta Group Holdings Pty Ltd is limited by shares, incorporated and domiciled in Australia.

Directors: Con Petropoulos
ABN: 37 159 149 185
ACN: 159 149 185
State of Registration: Victoria
Date of Registration: 22 June 2012
Registered Address: 577 Plummer Street
 Port Melbourne VIC 3207
p: +61 3 9646 8277
f: +61 3 9646 6877
e: delta@deltagroup.com.au
w: deltagroup.com.au

Delta Pty Ltd is limited by shares, incorporated and domiciled in Australia.

Directors: Con Petropoulos & Danny Busatta
ABN: 67 007 069 794
ACN: 007 069 794
State of Registration: Victoria
Date of Registration: 14 September 1988
Registered Address: 577 Plummer Street
 Port Melbourne VIC 3207
p: +61 3 9646 8277
f: +61 3 9646 6877
e: delta@deltagroup.com.au
w: deltagroup.com.au



DELTA GROUP HOLDINGS PTY LTD
 ABN 37 159 149 185
 ACN 159 149 185



OPERATIONS

Our people are what set us apart and why our clients trust us to deliver high risk, complex work programmes on time, on budget and without incident.

With more than 950 qualified and trained staff Australia wide our people don't just benefit from exciting and diverse projects with blue chip clients, they benefit from a culture of collaboration and innovation that allow them to make the most of their remarkable skills and talent.



OPERATIONS

Delta Group operates solely in Australia with day-to-day operations involving the supply of specialist and diversified construction services to a wide range of clients spanning industrial and commercial sectors:



VISION, MISSION & VALUES | ABOVE & BEYOND

Our vision is to shape the urban and industrial landscapes of tomorrow.
Our mission is to understand the project lifecycle better than any other contractor.

Our people and our values matter. Above & Beyond is our ethos. The sum of all our parts. It's our way of working and our measure for success, no matter what we set out to do or accomplish. It's how we shape tomorrow, for ourselves and our clients.

PEOPLE FIRST. | THINK DIFFERENTLY. | DETERMINED. | DEPENDABLE.

GLOBAL & DOMESTIC SUPPLY CHAINS



USA & MEXICO

- Heavy Plant, Equipment & Spare Parts
- Power Tools
- Geotextiles & Waterproofing Membranes
- Light Vehicles & Spare Parts

UK & EUROPE

- High Explosives
- IT&T Hardware
- Heavy Plant, Equipment & Spare Parts
- Power Tools

CHINA

- IT&T Hardware
- Heavy Plant, Equipment & Spare Parts
- Power Tools
- Steel Concrete
- Rubber Conveyor Belts
- Landscaping Supplies
- Construction Materials
- Geotextiles & Waterproofing Membranes
- PPE
- Cleaning Products
- Uniforms
- Office Supplies & Furniture

JAPAN & SOUTH KOREA

- IT&T Hardware
- Heavy Plant, Equipment & Spare Parts
- Light Vehicles & Spare Parts
- Power Tools

INDIA & PAKISTAN

- Concrete
- Landscaping Supplies
- Uniforms
- PPE

TAIWAN

- Power Tools

MALAYSIA

- IT&T Hardware
- Power Tools

INDONESIA

- Construction Materials
- Landscaping Supplies

THAILAND

- Light Vehicles & Spare Parts
- Construction Materials
- Landscaping Supplies
- IT&T Hardware

AUSTRALIA

- Transport & Haulage
- Drilling, Piling & Foundations
- Scaffolding
- Occupational Hygiene
- Professional Services
- Engineering Design
- Environmental Monitoring & Analysis
- Geotechnical Analysis & Surveying
- Asbestos Removal
- Crane & Rigging
- Concrete, Asphalt & Steel Supply | Placement
- Traffic Management
- Emergency & Disaster Response
- Horticultural Design & Installation
- Arborist Services
- Electrical, Hydraulics & Plumbing Trades
- Archaeological & Cultural Surveys
- Security
- Training
- Lighting
- Office Furniture, Supplies & Consumables
- Accommodation & Travel
- Soil & Water Remediation
- Landscaping Supplies
- Construction Materials
- Waste Management & Landfill

Delta Group works directly with up to 1,500 suppliers to the Australian building and construction sector, including specialist manufacturers, subcontractors, consultants and traditional commercial vendors. Our supply chains are diverse and geographically aligned to our operations in each (mainland) Australian State or Territory, encompassing SOHO and SME businesses through to medium and large, multi-national businesses.

The majority of goods and services procured by Delta Group and its related entities are sourced from within Australia, with a range of specialist products manufactured in China, India, Thailand, Indonesia, Malaysia, Taiwan, Japan, Korea, UK & Europe, Mexico and the USA.



The launch of new building services for Non Process Infrastructure requires close attention to the supply chains we use for construction materials.

MODERN SLAVERY RISK ASSESSMENT

Under the Act, the risks of modern slavery practices means the potential for Delta Group and all related entities to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains.

- + Risks that our operations may directly result in modern slavery practices.
- + Risks that our operations and/or actions in our supply chains may contribute to modern slavery. This includes acts or omissions that may facilitate or incentivise modern slavery.
- + Risks that our operations, products or services may be connected to modern slavery through the activities of any other we have a business relationship with. Our business relationships include all of the entities in our supply chains, including entities we do not have a direct contractual relationship with.

SECTOR & INDUSTRY RISKS

Any sector or industry recognised as having high modern slavery risks because of their characteristics, products and processes.

PRODUCT & SERVICE RISKS

Any good (products and services) that has been recognised as having high modern slavery risks because of the way they are produced, provided or used.

GEOGRAPHIC RISKS

Any country that has been recognised as having a demonstrably higher risk of modern slavery, including poor governance, weak rule of law, conflict, migration flows and socio economic factors like poverty.

ENTITY RISKS

Any entity that demonstrate poor governance structures, have a verifiable record of treating workers poorly or a track record of human rights violations.

PRODUCT, SERVICE & GEOGRAPHIC RISKS

Prior to undertaking a risk assessment survey of our supply chains, we referenced the *US Department of Labour 2018 List of Goods Produced by Child or Forced Labour* to better understand the nature or scope of (known) product, service and geographic risks that may be relevant to our operations.

GOOD	COUNTRY	REPORTING &/OR RELATED ENTITY	OPERATIONS
Brassware	India	CMA Contracting Pty Ltd	NPI Construction Services
Bricks	Afghanistan, Argentina, Bangladesh, Bolivia, Brazil, Burma, Cambodia, , China, Ecuador, Egypt, India, Iran, Nepal, North Korea, Pakistan, Paraguay, Peru, Russia, Uganda, Vietnam		
Carpets	Afghanistan, India, Iran, Nepal, Pakistan		
Ceramics	Brazil	All	Office Supplies
Coffee	Brazil, Colombia, Costa Rica, Cote d'Ivoire, Dominican Republic, El Salvador, Guatemala, Guinea, Honduras, Kenya, Mexico, Nicaragua, Panama, Sierra Leone, Tanzania, Uganda, Vietnam		
Christmas Decorations	China		
Copper	Democratic Republic of Congo	Delta Recycling Pty Ltd	Recycled Goods Sales
Cotton	Argentina, Azerbaijan, , Benin, Brazil, Burkina Faso, China, Egypt, India, Kazakhstan, Kyrgyz Republic, Mali, Pakistan, Tajikistan, Turkey, Turkmenistan, Uzbekistan, Zambia	All	Personal Protective Equipment Uniforms
Diamonds	Angola, Central African Republic, Democratic Republic of the Congo, Guinea, Liberia, Sierra Leone	All	Diamon Tipped Saw Cutting Tools & Attachments
Electronics	Malaysia, China	All	IT&T Hardware
Embellished Textiles	India, Nepal	All	Personal Protective Equipment Uniforms
Footwear	Bangladesh, Brazil, China, India, Turkey, Vietnam	All	Personal Protective Equipment
Furniture (Steel)	Bangladesh	All	Office Furniture Landscaping NPI Construction Services
Garments	Argentina, Bangladesh, Brazil, Burma, China, India, Malaysia, Thailand, Turkey, Vietnam	All	Personal Protective Equipment Uniforms
Glass	Bangladesh	CMA Contracting Pty Ltd Delta Pty Ltd	NPI Construction Services Landscaping
Granite	Benin, Burkina Faso, Nigeria, Sierra Leone		
Nails	China	All	Site Establishment
Rubber	Burma, Cambodia, Indonesia, Liberia, Philippines, Vietnam	All	Light & Heavy Vehicles
Soap	Bangladesh	All	Office Supplies
Tea	Kenya, Malawi, Rwanda, Tanzania, Uganda, Vietnam		
Textiles	Bangladesh, Cambodia, China, North Korea, Vietnam	All	Personal Protective Equipment Uniforms
Timber	Brazil, Cambodia, North Korea, Peru, Russia, Vietnam	All	Site Establishment NPI Construction Services Landscaping

DELTA GROUP SUPPLY CHAINS SURVEY

We surveyed our supply chains to better understand and develop risk profiles for identifying, managing and mitigating actual or potential situations of modern slavery across our business. In doing so we alerted our supply chains to the reporting requirements of the Modern Slavery Act 2018 and significantly improved transparency about modern slavery and the *UN Guiding Principles on Business & Human Rights* we are all obliged to follow. 31% of recipients responded to our inaugural survey.

COMMERCIAL PROFILE

The majority of Delta Group's direct supply chains are SME businesses with less than 20 staff and up to \$30m of annual revenue. More than 80% procure goods and services predominantly from Australian suppliers. Most maintain sophisticated, independently certified management systems in order to meet the requirements of Commercial, Government and/or Mining and Resources construction project work.



MODERN SLAVERY & HUMAN RIGHTS PROFILE

- + 86% were aware of the mandatory reporting requirements for reporting entities under Australia's Modern Slavery Act 2018 (Cth).
- + 76% had not made a public commitment to reject any form of modern slavery, nor did they have a Modern Slavery or Human Rights policy.
- + 71% had not developed an action plan to identify and address the risks of modern slavery in their operations and supply chain, nor had they conducted a self assessment.
- + 14% were developing 3rd party partnerships to gain a better understanding of modern slavery risks in their operations and supply chain.
- + 36% procured goods manufactured overseas (refer pages 5-6).
- + 81% had an Occupational Health & Safety Policy.
- + 62% had an Anti Discrimination and/or an Employee Code of Conduct Policy.
- + 52% had an Anti Harassment Policy.
- + 48% had a Grievance, Working Hours and/or Wages & Benefits Policy.
- + 33% had an Anti Corruption & Bribery and/or Recruitment Policy.
- + 19% had a Whistleblower, Freedom of Association and/or Migrant Workers Policy.

- + 71% do not require their contractors, agents and/or suppliers to abide by policies and procedures that prohibit modern slavery.
- + 48% reserve the right to suspend or terminate business relationships with contractors, agents and suppliers who fail to comply with their company policies.
- + 33% verify compliance with their company policies.
- + 52% conduct independent audits of their own operations, largely as a result of ISO certifications.
- + 16% conduct audits of their supply chains. However, 90% do not include specific Modern Slavery provisions.
- + 95% do not monitor, measure or report the effectiveness of efforts and controls for finding or preventing modern slavery in their operations and supply chains. However, 100% had not identified any instances of modern slavery abuses in their supply chains.
- + 81% had not undergone training on modern slavery and how to mitigate modern slavery risks in their supply chains. For those respondents who had introduced training, it was largely for Directors and/or Officers only.



Where our Staff Uniforms and PPE is manufactured matters. Modern slavery risks abound across multiple supply chains in the manufacture of cotton, embellished textiles, textiles and garments.

DELTA GROUP RISK PROFILE

Delta Group welcomes the opportunity to join the Australian Government and all reporting entities in working to eliminate modern slavery in global supply chains and to improving the lives of millions of victims around the world. We are committed to challenging ourselves and all of our supply chains at home or abroad. We will remain vigilant for any form of modern slavery and strive to improve our management systems so as to maintain robust and highly transparent commercial supply relationships.

Our first assessment of the types of modern slavery identified four key risk categories as the most relevant to Delta Group operations and our supply chains:

FORCED LABOUR

Where the victim is either not free to stop working or not free to leave their place of work.

DECEPTIVE RECRUITING FOR LABOUR

Where the victim is deceived about whether they will be exploited through a type of modern slavery.

WORST FORMS OF CHILD LABOUR

Where children are engaged in hazardous work which may harm their health, safety or morals

DEBT BONDAGE

Where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.

DELTA GROUP RISK PROFILE

Our first modern slavery risk assessment identifies a rating of *Medium-to-High* for those risk profiles determined as the most relevant or applicable to our operations and supply chains. Risks that our operations cause modern slavery were found to be negligible. Similarly, our rigorous and proven supplier prequalification processes mitigate real or perceived entity risks. As a result, our concern is where Delta Group may contribute to or is directly linked to modern slavery. Our ratings also reflect an (initial) lack of visibility and are designed to focus management attention so we can prioritise targeted investigation of key segments to more accurately identify, remediate or eliminate risk.

RISK PROFILE	SECTOR/ INDUSTRY	PRODUCTS/ SERVICES	GEOGRAPHIC	ENTITY
CAUSE	LOW			
CONTRIBUTE TO	MEDIUM-HIGH			LOW
DIRECTLY LINKED	MEDIUM-HIGH			

Other types of modern slavery such as *Trafficking in Persons, Slavery, Servitude and Forced Marriage* weren't identified as presenting direct or material risks to our operations or supply chains. Regardless, Delta Group will continue to re-assess direct and indirect risks. As future assessments undertake more detailed investigations we may, as a result, identify other types of modern slavery risks to act upon.

OPERATIONAL RISK

Delta Group's national workforce is either employed under salaried contracts that are fully compliant with Fair Work Australia's National Employment Standards and which exceed the relevant Modern Award equivalent, or under registered Enterprise Bargaining Agreements that have been recognised by the Australian Building & Construction Commission and Fair Work Commission as compliant with the Building Code 2016.



As a result, modern slavery risks within our direct team are negligible. Superannuation payments and leave entitlements, including COVID Safe working from home and flexible work arrangements, are also compliant with the relevant statutory and regulatory requirements.

Operational risks were also assessed wherever we engage contractors and/or third party labour (hire) providers. In particular, we identified security and professional cleaning contractors as the highest risk services in our operations.

Our risk assessment determined that many of these workers can be immigrants, temporary migrant workers, international students or other vulnerable groups that are much less aware of their rights and, therefore, open to exploitation or exploitative employment practices.

Whilst we employ proven and robust prequalification processes for all subcontractors, consultants and/or suppliers, we are committed to improving our policies and procedures to increase visibility over the supply of these services to Delta Group and our related entities.

Third party labour (hire) services such as those we engage for Traffic Management can involve vulnerable 'at risk' groups such as immigrants, temporary migrant workers and international students.



DELTA GROUP RISK PROFILE

SUPPLY CHAINS RISK

Delta Group shares the same services and supply chains across all related entities and each reporting entity. We have developed and maintain robust prequalification processes and operating (project and/or site specific) policies to ensure full compliance with the Building Code 2016 and to support our own Industrial Relations strategies. All trade and non-trade suppliers, consultants and/or subcontractors must adhere to best practice governance and risk management protocols to achieve prequalified status, including (but not limited to):

- + Financials
- + Insurances
- + Licenses & Accreditation
- + Risk Management Systems
- + Quality, Safety & Environmental Management Systems*
- + Quality, Safety & Environmental Performance
- + Relevant Capabilities & Experience, including Personnel
- + Plant & Equipment

We also maintain and operate (Building) Code compliant Security of Payment processes.

As reported previously, our (initial) risk assessment of Delta Group supply chains focused on where we may contribute to or may be directly linked to modern slavery by product, service and/or geographic risks.

PRODUCT/SERVICE	COUNTRY	REPORTING &/OR RELATED ENTITY	OPERATIONS	RISK PROFILE
Brassware	India	CMA Contracting	NPI Infrastructure Construction Services	Sourced from Australia or other countries
Bricks	Afghanistan, Argentina, Bangladesh, Bolivia, Brazil, Burma, Cambodia, China, Ecuador, Egypt, India, Iran, Nepal, North Korea, Pakistan, Paraguay, Peru, Russia, Uganda, Vietnam			
Carpets	Afghanistan, India, Iran, Nepal, Pakistan			
Coffee	Brazil, Colombia, Costa Rica, Cote d'Ivoire, Dominican Republic, El Salvador, Guatemala, Guinea, Honduras, Kenya, Mexico, Nicaragua, Panama, Sierra Leone, Tanzania, Uganda, Vietnam	All	Office/Site Consumables	Current supplies ethically certified/sourced

* In the absence of independent certification, subcontractors and suppliers are contractually bound to follow Delta Group QSE Management Systems.

DELTA GROUP RISK PROFILE

SUPPLY CHAINS RISK

PRODUCT/SERVICE	COUNTRY	REPORTING &/OR RELATED ENTITY	OPERATIONS	RISK PROFILE
Christmas Decorations	China	All	Office/Site Consumables	Sourced from Australia
Copper	Democratic Republic of Congo	Delta Recycling	Recycled Product Sales	Distribution/ Manufacturing Source Unknown
Cotton	Argentina, Azerbaijan, Benin, Brazil, Burkina Faso, China, Egypt, India, Kazakhstan, Kyrgyz Republic, Mali, Pakistan, Tajikistan, Turkey, Turkmenistan, Zambia, Uzbekistan	All	Uniforms/PPE	
Diamonds	Angola, Central African Republic, Democratic Republic of the Congo, Guinea, Liberia, Sierra Leone	All	Diamond Tipped Saw Cutting Tools & Attachments	
Electronics	Malaysia, China	All	IT&T Hardware	
Embellished Textiles	India, Nepal	All	Uniforms/PPE	
Footwear	Bangladesh, Brazil, China, India, Turkey, Vietnam	All	PPE	Sourced from Australia or other countries
Furniture (Steel)	Bangladesh	All	Office Furniture	Manufacturing Source Unknown
Garments	Argentina, Bangladesh, Brazil, Burma, China, India, Malaysia, Thailand, Turkey, Vietnam	All	Uniforms/PPE	
Glass	Bangladesh	Delta CMA Contracting	Landscaping NPI Construction Services	Sourced from Australia or other countries



Diamond tipped Saw Cutting tools and attachments could present a serious risk of modern slavery.

DELTA GROUP RISK PROFILE

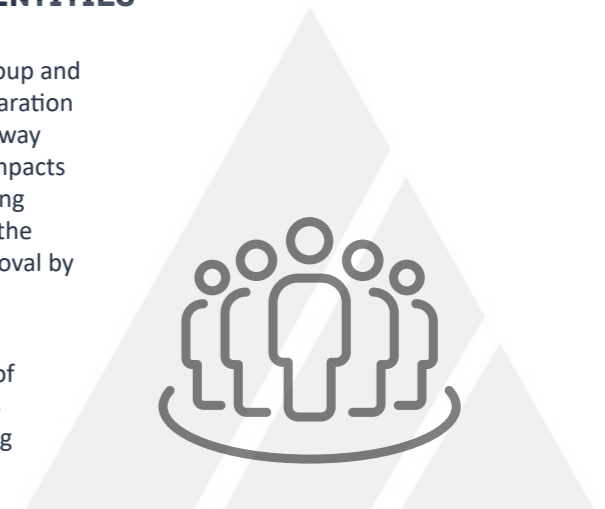
SUPPLY CHAINS RISK

PRODUCT/SERVICE	COUNTRY	REPORTING &/OR RELATED ENTITY	OPERATIONS	RISK PROFILE
Granite (inc. Crushed)	Benin, Burkina Faso, Nigeria, Sierra Leone	Delta CMA Contracting	Landscaping NPI Construction Services	Sourced from Australia or other countries
Nails	China	All	Site Establishment NPI Construction Services	Manufacturing source unknown
Rubber	Burma, Cambodia, Indonesia, Liberia, Philippines, Vietnam	All	Heavy Plant & Equipment Light Vehicles Conveyor Belts	Manufacturing source unknown
Soap	Bangladesh	All	Office/Site Consumables	Sourced from Australia or other countries
Tea	Kenya, Malawi, Rwanda, Tanzania, Uganda, Vietnam	All	Office/Site Consumables	Current supplies ethically certified/sourced
Textiles	Bangladesh, Cambodia, China, North Korea, Vietnam	All	Uniforms/PPE	Manufacturing source unknown
Timber	Brazil, Cambodia, North Korea, Peru, Russia, Vietnam	All	Site Establishment	Sourced from Australia or other countries

CONSULTATION WITH CONTROLLED ENTITIES

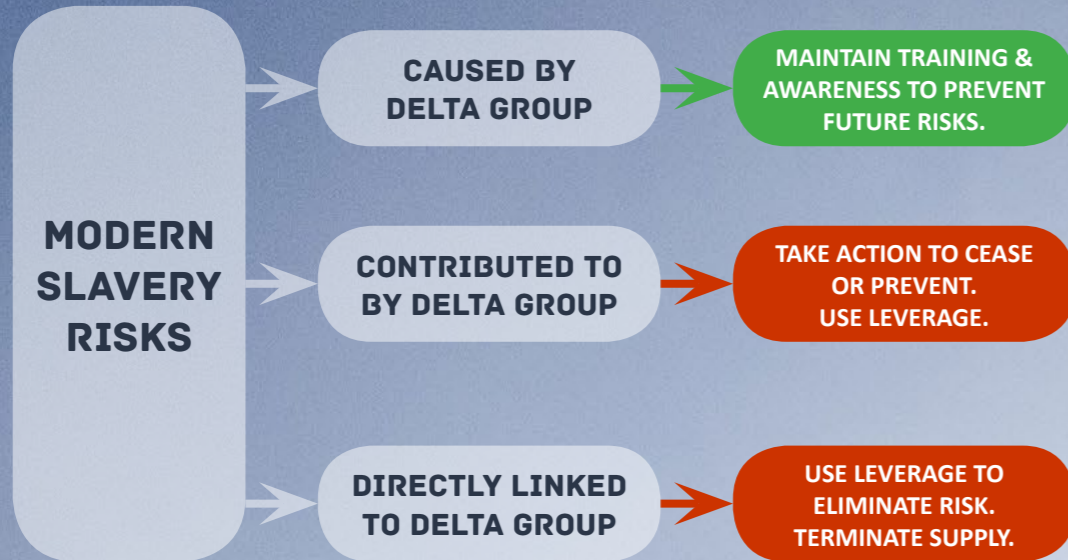
Executive and Senior Management across Delta Group and all related entities have been consulted in the preparation of this Joint Statement. Consultation took place by way of Microsoft 'Teams' online meetings (due to the impacts of COVID-19), telephone and email. A (small) working group comprising executive management oversaw the production of this Joint Statement prior to its approval by our Managing Director & Founder (as the Principal Governing Body under the Act).

Executive and senior management are now aware of our obligations under the Modern Slavery Act 2018 and united in our commitment to improving existing governance measures and controls as well as in developing new measures and controls.



KEY ACTIONS

Where we have identified negligible or low risk across our operations and/or supply chains we commit to maintaining close monitoring and continuous assessment of modern slavery risks. Where we have identified medium-high (initial) risk profiles across our operations and/or supply chains we commit to clear and measurable actions that manage, mitigate and/or eliminate risk.



We will engineer a targeted approach that carefully pinpoints modern slavery risks in our operations and supply chains and prioritises key actions that are measurable, accountable, realistic and effective.

Our actions will strive to cease or prevent our contribution to modern slavery risks and provide for (or cooperate in) remedying actual impacts. We will use leverage to mitigate these risks, with a particular focus on eliminating risks that may directly link Delta Group to modern slavery. Failing successful remedial actions we will seek to terminate any compromised business relationship.

KEY ACTIONS

MITIGATING & REMEDIATING MODERN SLAVERY RISKS

Delta Group will rely upon our triple certified Quality (ISO9001), Safety (ISO45001) and Environmental (ISO14001) Management Systems, as well as our Risk (ISO31000) Management System, to maintain strong policies, procedures and practices that address actual or perceived modern slavery risks in our operations and supply chains.



GOVERNANCE & POLICY

CORPORATE SOCIAL RESPONSIBILITY (CSR) WORKING GROUP

We will establish a national working group comprising senior/middle management from all reporting and related entities. Executive management will agree on the Terms of Reference for the CSR Working Group, incorporating a governance framework to oversee modern slavery, ethical sourcing, sustainability and social procurement policies and practices. The CSR Working Group will be responsible for holding quarterly meetings and for undertaking annual performance reviews against agreed targets, including the tracking and reporting of key actions from this Joint Statement.

MAR 2021
CSR Working Group Established

MAR 2021 | JUN 2021 | SEP 2021 | DEC 2021
Working Group Quarterly Meetings

DEC 2021
2021 Joint Statement Published

QUALIFIED THIRD PARTY PARTNERSHIPS

We will establish relationships with qualified third party organisations and/or individuals to support the development, implementation and review of our CSR policies and practices, including modern slavery. Third party partnerships will also contribute to the design and implementation of internal and external (independent) auditing protocols.

JUN 2021
Third Parties Engaged & Audits Initiated

DEC 2021
Supply Chain Audits Completed

MANAGEMENT TRAINING

We will engage a qualified RTO to design and complete executive and senior management training on modern slavery risk mitigation measures and controls.

SEP 2021
Management Training Completed

POLICY REVIEW

We will conduct a review/audit of all current policies and standards, including the development and publication of new policies and standards, to align with best practice modern slavery risk mitigation measures and controls.

JUN 2021
Policy Review & Audit Completed

SEP 2021
New & Amended Policies Published

KEY ACTIONS

GOVERNANCE & POLICY

CONTRACTS REVIEW

We will conduct a review/audit of existing (procurement) contract terms and conditions, incorporating new terms and conditions, to align with best practice modern slavery risk mitigation measures and controls.

JUN 2021
Contract Review & Audit Completed

SEP 2021
New & Amended T&Cs Published

STAFF INDUCTIONS

We will develop and introduce CSR content incorporating modern slavery risks for new staff inductions, including retrospective ('refresher') inductions for existing staff.

SEP 2021
New & 'Refresher' Staff Induction Launched

SUPPLY CHAINS

PREQUALIFICATION PROCESS & SYSTEM REVIEW

We will undertake a review of existing subcontractor and supplier prequalification processes, including our dedicated online portal. We will scope business requirements and costs for upgrading our digital capacity, including the introduction of new modern slavery risk mitigation measures and controls.

JUN 2021
System Scope & Cost Estimates Complete

TRADE SERVICES: LABOUR HIRE, SECURITY & CLEANING

We will undertake an audit of all current Labour Hire, Security and Cleaning supply chains to ensure full compliance with the Fair Work Act 2009, National Employment Standards and/or Modern Award (minimum) terms and conditions.

JUN 2021
Professional Services Audit Complete

RECYCLED PRODUCT SALES: STEEL & COPPER

We will undertake an audit of all current recycled product sales channels, particularly targeting steel and copper products to increase transparency of in-market receipt and re-distribution labour practices.

JUN 2021
Recycled Product Sales Audit Complete

STAFF UNIFORMS & PERSONAL PROTECTIVE EQUIPMENT

We will undertake an audit of all current clothing supply chains incorporating staff uniforms and PPE to confirm source regions and manufacturers.

SEP 2021
Uniforms & PPE Audit Complete

DIAMOND TIPPED SAW CUTTING TOOLS & ATTACHMENTS

We will undertake an audit of all current supply chains for diamond tipped saw cutting tools and attachments and confirm source regions (and mines) of diamond components.

SEP 2021
Saw Cutting Audit Complete

KEY ACTIONS

SUPPLY CHAINS

**RUBBER PRODUCTS:
HEAVY PLANT, LIGHT VEHICLES & CONVEYOR BELTS**

We will conduct an audit of existing supply chains incorporating rubber products to confirm source regions and manufacturers.



SEP 2021
Rubber Products Audit Completed

NAILS: SITE ESTABLISHMENT

We will conduct an audit of existing supply chains incorporating nails for site establishment activities and to confirm source regions and manufacturers.



SEP 2021
Nails Audit Completed

MONITORING COMPLIANCE

DELTA GROUP OPERATIONS

Risks presented by third party contractors and/or labour hire providers, particularly for the delivery of Security and Professional Cleaning services may involve vulnerable 'at risk' groups. We will strengthen our already rigorous prequalification processes and contract management systems to ensure compliance with all regulatory and statutory requirements. Third party partnerships will also seek to develop and introduce internal and external (independent) audit protocols to further mitigate non-compliant practices.

SUPPLY CHAINS

Digital (technology) solutions exist for strengthening our risk management framework and compliance monitoring of diverse and geographically dispersed supply chains. This can involve risk self assessment surveys (refer below) as well as the scoping of a new online portal to increase and maintain visibility over the business policies, procedures and practices throughout our (direct) supply chains. More robust compliance monitoring will, in turn, improve visibility over indirect or secondary and tertiary supply chains.

2021 SUPPLY CHAINS SURVEY: RISK SELF ASSESSMENT

We will undertake a second survey of our supply chains involving a risk self assessment.



SEP 2021
Survey Distributed to Supply Chains



DEC 2021
Survey Findings & Published



The sale of recycled steel and copper from our demolition sites could involve modern slavery risks that we are obliged to investigate.

TRACKING & MEASUREMENT

Over the course of the next year we will track and measure the effectiveness of our actions to identify, manage and mitigate the risks of modern slavery we have identified in our business and supply chains.

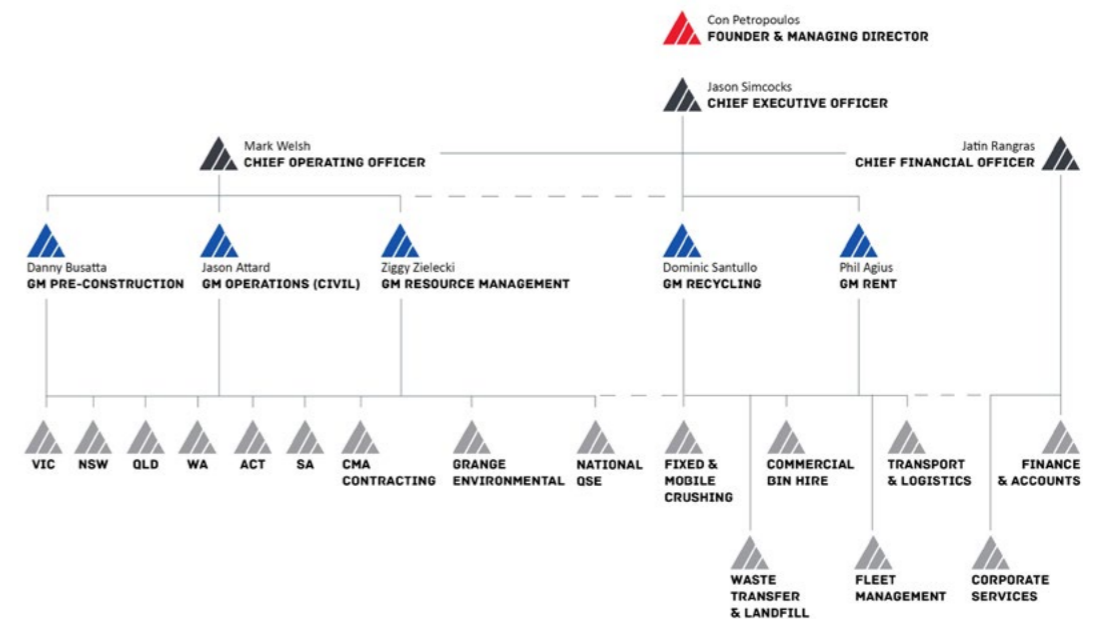
FRAMEWORK	ACTION	MEASURE
Governance & Policy	<ul style="list-style-type: none"> + CSR Working Group + 3rd Party Partnerships + Policy Review + Management Training + Contracts Review + Staff Induction 	<ul style="list-style-type: none"> + Executive management oversight + Terms of Reference & Meeting Schedule/Minutes + % meeting attendance + Engagement of 3rd parties + Policy Publication & Communication + % of management trained + % of contracts with Modern Slavery Terms & Conditions + % of staff inducted, including existing
Supply Chains	<ul style="list-style-type: none"> + Prequalification Process + Targeted Supply Chain Audits 	<ul style="list-style-type: none"> + Digital system business requirement scoping and cost estimates + Modern slavery prequalification measures introduced + Supplier segmentation per risk profile and rating + % of targeted audits complete
Monitoring	<ul style="list-style-type: none"> + Internal audit protocols + External audit protocols + Risk self assessment survey 	<ul style="list-style-type: none"> + Remediation and corrective action plans in place + % audits complete + Audit risk ratings/profiles + % survey response rate and findings

MANDATORY REPORTING CRITERIA

This Joint Statement incorporates each of the seven mandatory criteria on behalf of both reporting entities as required under the Modern Slavery Act 2018, in particular:

MANDATORY CRITERIA	DELTA GROUP JOINT STATEMENT
Identify the reporting entity	Page 2
Describe the reporting entity's structure, operations and supply chains	Pages 3-6
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Pages 7-15
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Pages 8-9 Pages 16-20
Describe how the reporting entity assesses the effectiveness of these actions	Page 22
Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Page 2 Page 15
Provide any other relevant information	Pages 23-25

DELTA GROUP MANAGEMENT STRUCTURE



PLANT & EQUIPMENT

AUSTRALIA'S LARGEST PRIVATELY OWNED FLEET

Delta Group operates Australia's largest privately owned fleet of specialist plant and equipment. Purpose built to support our diversified services model our fleet is regularly upgraded and meticulously maintained to exacting OEM, regulatory and client requirements.

Sophisticated and NHVR compliant GPS transport, logistical and scale systems track the movement and loads of more than 1,000 trucks and machines across Australia.

EXCAVATORS

- 0.8-160 tonne
- Digging, Trenching, Excavation
- Construction, Remediation & Demolition
- Long Reach & Telescopic
- OEM & Custom Fabricated Precision Attachments
- GPS & Scale Systems

DEMOLITION ROBOTS & SKID STEERS

RIGID & ARCTIC DUMP TRUCKS

- 30-100 tonne
- Haul Road Construction & Management
- Civil Infrastructure & Sub Divisions

DOZERS

- D6-D11
- Pushing & Ripping
- Construction, Remediation & Rehabilitation

WHEEL LOADERS

- 12-54 tonne
- Sales Loader & Concrete Batching
- Construction, Remediation & Rehabilitation

GRADERS

- 14-16m
- Clearing & Grubbing
- Haul Road Construction & Management
- Road Works, Sub Divisions, Civil Infrastructure

SMOOTH & PADFOOT ROLLERS

WATER TRUCKS

- 24,000-40,000 litre
- Construction, Road Works & Haul Roads
- Sub Divisions & Civil Infrastructure

COMPACTORS

- 815-825
- Road Works, Sub Divisions, Civil Infrastructure
- Construction, Remediation & Rehabilitation

HEAVY RIGID, HEAVY COMBINATION & COMMERCIAL BIN TRUCKS

- Quad Dogs
- Truck & Dogs
- 8-10 Wheel Rigid Tippers
- 5 Axle, Front & Rear Lift Bin Trucks
- Hook & Marrel Skip Bins

PEOPLE FIRST.

FOR DELTA GROUP AND ALL RELATED
ENTITIES, PEOPLE COME FIRST.
OUR PEOPLE. YOUR PEOPLE.
ALL PEOPLE.



DELTA GROUP
SHAPING TOMORROW

MELBOURNE
577 PLUMMER STREET
PORT MELBOURNE VIC 3207

SYDNEY
83 BOURKE ROAD
ALEXANDRIA NSW 2015

BRISBANE
3/33 REMORA ROAD
HAMILTON QLD 4007

CANBERRA
15 GEELONG STREET
FYSHWICK ACT 2609

ADELAIDE
33-43 PORT ROAD
THEBARTON SA 5031

PERTH
1/32 LEDGAR ROAD
BALCATTWA WA 6021

KARRATHA
LOT 2891 PEMBERTON WAY
KARRATHA WA 6714

DARWIN
16/19 SMITH STREET MALL
DARWIN NT 0800