



# Modern Slavery Statement

# 1. Introduction

As a family-owned Australian company delivering community projects, Lloyd Group cares greatly about our staff, the people we work with, our communities and our environment.



This statement is made on behalf of Lloyd Group Pty Limited (ABN 96 069 674 479) (Lloyd Group) in compliance with the Modern Slavery Act 2018 (Cth) and sets out the steps we have taken during the financial year ending 30 June 2022 (FY2022) to identify and address modern slavery in our operations and supply chain.

As a family-owned Australian company delivering community projects, Lloyd Group cares greatly about our staff, the people we work with, our communities and our environment.

Lloyd Group firmly believes in the protection of human rights, including the absolute rights to freedom from slavery and forced labour and to freedom from torture and other cruel, inhuman or degrading treatment or punishment.

We are committed to continuing to develop and strengthen our response to modern slavery over time and during FY2022 we have put into place procedures to ensure our employees can identify and respond to indicators of modern slavery and to ensure Lloyd Group is able to assess and address risk of modern slavery in our direct supply chain in 2023 and beyond.

Lloyd Group's mission is to "create a positive legacy for future generations" and we believe that should be a future where modern slavery no longer exists in our operations or supply chain.

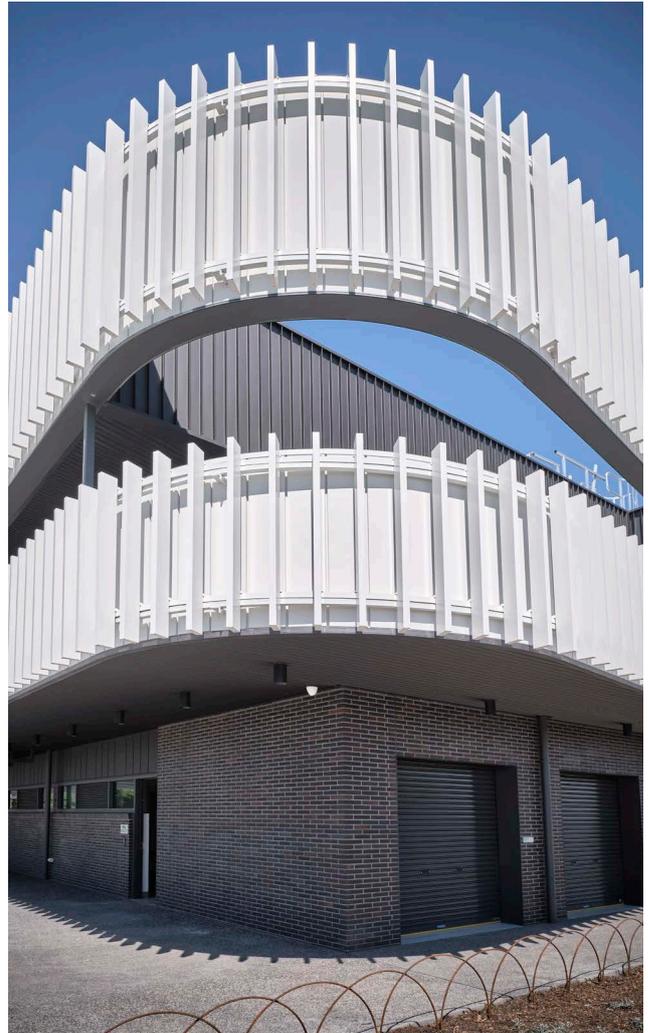
# 2. Structure and Operations

Lloyd Group was established in 1979 and is a family-owned construction company. It has offices in Melbourne, Geelong, Sydney, Brisbane and Newcastle.

In FY2022, with a team of 238 dedicated staff, Lloyd Group had the financial capacity, expertise and experience to undertake any project up to \$40m in value, across the following sectors:

- Education
- Childcare
- Ecotourism
- Community
- Health
- Emergency Services
- Commercial
- Retail
- Aged Care

At Lloyd Group, we are driven by our core values – integrity, teamwork, excellence and innovation. In accordance with these values, we are determined to carry out business ethically and with integrity and transparency. We expect the same high standards from our suppliers and subcontractors.



# 3. Supply Chain

In FY2022, Lloyd Group procured over \$232 million of goods and services from over 2100 direct suppliers. Our direct supply chain includes the procurement of goods and services for our:



## Corporate Supply Chain

including staff uniforms and PPE, cleaning of offices, IT software and hardware, office furniture, professional services



## Construction Supply Chain

including subcontractors, consultants, materials and manufactured products who supply goods and services to our sites in Victoria, New South Wales and Queensland

Being in the construction industry, many of our direct suppliers to our construction sites:

- manufacture products in factories in Australia or overseas;
- source materials and products from overseas or have components manufactured overseas; and
- have a large unskilled labour workforce which may include migrant labour.

We have identified the supply chains of these direct suppliers as our highest risk area for modern slavery in our supply chain.

In FY2022, a particular issue faced by the construction industry as a whole was the labour shortage brought on by Government directions in response to the COVID-19 pandemic and the fact workers have been able to command higher wages and be more selective about their chosen employer than in previous years. This has put pressure on the construction supply chain and created greater reliance within the industry on labour hire companies. This trend has not affected Lloyd Group as we predominantly deal with owner/operator companies who do not typically rely on labour hire.

# 4. Risk Assessment, Due Diligence and Remediation

The focus for our statement for FY2022 has been:

- to put in place systems and processes that effectively and efficiently identify modern slavery risk in our supply chain and are scalable as Lloyd Group continues to grow; and
- educate our employees and construction supply chain on how to identify and respond to indicators of modern slavery.

Cumulatively since FY2020, Lloyd Group has taken the steps outlined in Table to 1 assess and address modern slavery risk in its supply chain:

Action		FY2020 to FY2022
Documentation	✓	Publish a Whistleblower Policy
	✓	Publish a Modern Slavery Policy
	✓	Ensure all new subcontracts have a modern slavery clause
	✓	Update internal project delivery procedures to provide that our construction supply chain must have completed a modern slavery questionnaire on our induction software before commencing on site
Due Diligence	✓	Set up a modern slavery questionnaire on our site induction software which is to be automatically completed by our construction supply chain on engagement
	✓	Investigate any issues identified in construction supply chain questionnaire responses or raised by employees
Training	✓	Train employees on Whistleblower Policy
	✓	Train employees on how to identify, assess and respond to modern slavery risks
	✓	Train construction supply chain on how to identify, assess and respond to modern slavery risks (incorporated into induction software)

Table 1 – Lloyd Group Assess and Address Plan

Following a disappointing response rate from Lloyd Group's "high value suppliers" (ie spend of over \$100,000) to the modern slavery questionnaire issued in FY2021, we have now introduced processes to make our modern slavery questionnaire compulsory for our construction supply chain to answer before they are given access to site. This was implemented late in FY2022 so the success of this approach will be commented on in more detail in FY2023's statement. To date, none of the respondents to our modern slavery questionnaire to date is aware of modern slavery in their supply chain.

The majority of our employees were trained how to identify, assess and respond to modern slavery risks in June 2022 and efforts are continuing to ensure all employees complete the training. The training slides have been included in the questionnaire on our site

induction software to ensure our construction supply chain complete equivalent training to our employees.

Following the employee training, one of our site managers reported suspected modern slavery behaviour in our supply chain to management. We have forwarded relevant details to the Australian Federal Police.

Where potential modern slavery issues are identified through the systems and processes we have put in place, we will work with and continuously engage with the supplier to learn more about the issue and to put in place actions to help them address or mitigate the modern slavery risk.





## 5. Assessing Effectiveness

In 2022, we have focussed on improving the processes we put in place in 2021 to assess and address modern slavery and are satisfied that going forward we will be better positioned to more effectively assess all suppliers in our construction supply chain.

From 1 July 2022, we intend to assess the effectiveness of the actions taken by Lloyd Group to assess and address modern slavery risk in its operations and supply chain by:

- Conducting an annual review of the processes we have put in place to assess and address modern slavery and look at ways to improve them.
- Where modern slavery risks have been identified in the previous financial year, working with suppliers to check how they are progressing any actions put in place to address those modern slavery risks.
- Conducting internal audits of internal processes put in place to assess and address modern slavery risk, for example ensuring all employees and suppliers have read Lloyd Group's Modern Slavery Policy and been trained on how to identify, assess and respond to modern slavery risk.

# 6. Consultation Process with Entities Owned or Controlled by Lloyd Group

Lloyd Group (QLD) Pty Ltd (ABN 82 614 922 100) is not a subsidiary of Lloyd Group but it does report into the same executive, directors and advisory board.

This statement is given under section 14 of the Modern Slavery Act 2018 (Cth) and was prepared in consultation with Lloyd Group (QLD) Pty Ltd.





## 7. Approval

This statement for financial year ending 30 June 2022 is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) and constitutes Lloyd Group Pty Limited's modern slavery statement.

The statement has been approved by the Board of Directors of Lloyd Group Pty Limited on 20 December 2022.

Clinton Lloyd  
Director

Dustin Lloyd  
Director