

# Modern Slavery Assessment Statement



# Our Commitment

Construction Control Australia Pty Limited are committed to treating all workers with respect and dignity, ensuring safe working conditions, delivering high quality projects, and conducting environmentally responsible and ethical operations.

Construction Control are committed to ending all forms of modern slavery and reducing the risk of modern slavery practices within our supply chains and operations.

As part of our overall commitment to supporting human rights around the world, we stand against all forms of modern slavery and work to ensure it does not find a foothold in our supply chains and business operations.

Modern slavery is defined by the *Modern Slavery Act (Cth) 2018* to include eight types of serious exploitation, which can be understood as:

- **trafficking in persons**, which is the recruitment, harbouring and movement of a person for the purposes of exploitation through modern slavery. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs;
- **slavery**, which is where the offender exercises powers of ownership over the victim;
- **servitude** which is where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work;
- **forced labour**, which is where the victim is either not free to stop working or not free to leave their place of work;
- **forced marriage**, which is where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony;
- **debt bondage**, which is 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;
- **the worst forms of child labour**, which involves situations where children are: exploited through slavery or similar practices, including for sexual exploitation; or engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs; and
- **deceptive recruiting for labour or services** which is where the victim is deceived about whether they will be exploited through a type of modern slavery

It can also extend to:

- entering into a commercial transaction involving a slave;
- exercising control or direction over, or providing finance for, any commercial transaction involving a slave or act of slave trading;
- conducting a business involving servitude or forced labour (including exercising control over the business or providing finance to it);

Construction Control's approach to limiting the risk of modern slavery practices are as follows:

## Operations

Our contractual terms reflect subcontractor prevention of modern slavery obligations, including compliance with Australian modern slavery laws and those foreign modern slavery laws that apply in the location(s) in which they operate.

## Supply Chain mapping and risk assessment

We encourage our suppliers to complete a Corporate Social Responsibility questionnaire which contains questions relevant to modern slavery. This provides us with a greater understanding of the risks of modern slavery within our supply chains or operations and enables us to work with our suppliers to reduce the risks identified. We actively work to improve our understanding and oversight of all tiers of our supply chains.

## Communications, Engagement and Training

Employees of Construction Control are provided communications and training opportunities to enhance their understanding of the causes and humanitarian impact of modern slavery. This includes familiarisation with our Prevention of Modern Slavery policy and procedures and our approach to limiting the risk of modern slavery within our supply chains.

## Continuous improvement approach to reduce the risk of modern slavery

Construction Control is committed to applying a continuous improvement approach to reducing the risk of modern slavery practices within our supply chains, subcontractor management and project operations. We seek feedback from our employees, subcontractors, clients and other stakeholders in regard to the success or otherwise of the actions we have taken to reduce the risk of modern slavery.

# Operations

**Commencing in 1988 Construction Control is a construction and project management firm delivering projects in the ACT, NSW, and QLD.**

The firm started doing small fitouts and refurbishments and quickly built a reputation for quality of outcome, and client, staff and partner satisfaction. The focus has always been on careful consideration and planning on all projects, and the forming of close, strategic collaborations with clients, consultants and contractors. We have consistently proven that complexity is only a challenge to be overcome. Our team thrives on solving complex problems in construction. We have delivered the improbable for our clients, within budget and to program.

Construction Control remains 100% Australian owned and operated, employing construction professionals who are the best and brightest in the game.

Our reputation for dedicated and methodical project delivery, focussed on each client's specific needs has meant we have grown our list of clients to include:

- Commonwealth, State and Territory Governments;
- Australia's top ranked educational institutions;
- Some of Australia's largest retail centres;
- publicly listed corporations and
- privately owned companies.

***The long-term relationships we have forged within the Canberra and Sydney business community and government sector are testaments to the quality of projects, our people, client focus and attention to detail.***

# Supply Chain Mapping

Construction Control conduct its operations in consultation and partnership with top tier subcontractors and suppliers.

Construction Control had over 1,229,158 manhours engaged on its construction projects during the 2020/21 financial year reporting period. On an average work month across Construction Control's nine active projects we had 105 direct employees and approximately 2,000 subcontractors and/or suppliers.

Construction Control engages with Australian based subcontractors and suppliers, many of whom source their materials from overseas sources, namely Italy, China, America, Austria, and other EU Nations.

Construction Control continually assesses modern slavery risks in our supply chain. Our assessment processes review and analyse the data to identify higher-risk areas of our business based on external reports and standards, country and sector risk profiles, and input from experts in this area.

In addition, to assess supplier-specific risk, we considered the industry, work type, geography, and supplier reputation, among other factors.



# Risk Assessment & Reporting

This is Construction Control’s second Modern Slavery Statement and we have used this reporting period as an opportunity to better understand the subject and educate our workers, subcontractors, and suppliers on practices to prevent and minimise modern slavery.

Steps taken in this period:

- Prevention of Modern Slavery Policy Statement review
- Prevention of Modern Slavery Procedure review
- Supply Chain Risk Assessment conducted
- Modern slavery criteria and clauses updated in our tenders, contracts and tender interviews. These documents challenge our suppliers to ensure the prevention and elimination of modern slavery.

A Modern Slavery Questionnaire has been conducted with our key suppliers. Consideration was given to modern slavery risks presented during the COVID-19 pandemic. As part of the assessment process, suppliers completed a self-assessment questionnaire about their working conditions, supply chain details, policies and management systems. The process also included supplier background checks and an examination of labor-related issues that appear in publicly available databases. As our operations and supplier’ operations have continued throughout the COVID-19 pandemic, our ability to undertake assessments was not affected.

High Risk Suppliers	Medium Risk Suppliers	Low Risk Suppliers
0	60%	40%

# Communication, Engagement & Training

Construction Control is committed to ensuring transparency in our business and approach to tackling modern slavery risks throughout our supply chains. We expect the same high standards from our suppliers, and we include specific measures in our tenders and contracts with suppliers against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether they are adults or children.

Training on the risks Construction Control face regarding modern slavery practices in our business operations and supply chains is provided to our staff and suppliers.

Construction Control encourages their staff and suppliers to raise concerns or suspicions of modern slavery in any parts of our business, our supply chains, or the supply chains of our suppliers.



## Continuous Improvement

Modern slavery is a serious crime and a violation of fundamental human rights. Construction Control believes that its modern slavery risk mitigation practices reflect its goals of acting ethically in the marketplace, with integrity to all workers, and with transparency to all stakeholders.

Our modern slavery risk mitigation practices also make good business sense and are consistent with our public disclosure obligations under the *Modern Slavery Act (Cth) 2018* in Australia and other applicable laws.

Construction Control seeks to continually improve its policies, procedures, education, questionnaire process and risk management practices regarding this important issue.

Construction Control is committed to the following actions during the next reporting period:

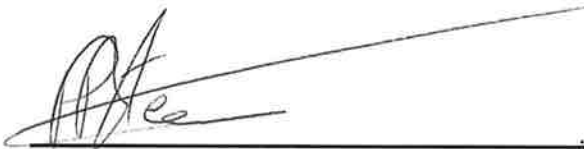
- Undertaking a detailed risk assessment of our operations and supply chain
- Reviewing results and planning steps to mitigate key risks
- Maintaining our due diligence by screening and interviewing our subcontractor companies at time of tender on modern slavery risk and compliance
- Further educating our staff regarding modern slavery

Managing the risk and assessing the effectiveness of these actions requires ongoing commitment and collaboration with our suppliers and the industry. To manage this, an internal working group will continue to engage and meet on a quarterly basis to discuss the control measures required to mitigate the risk. Recommendations will be provided to the Senior Management team for consideration and implementation.

During the period, Construction Control continued a relationship with an external support provider 'Centri' to ensure the company's commitment and obligations remain compliant to the *Modern Slavery Act (Cth) 2018* in Australia and to any other applicable laws.

This statement for the 2020/21 financial year is made pursuant to section 14 of the *Modern Slavery Act 2018* (Australian Government).

This statement was approved by the board of Construction Control on 20 December 2021.



Peter Payten  
Managing Director  
Construction Control  
20 December 2021