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Modern Slavery Act 2018 (Cth) C2018A00153

31 December 2020 to 30 June 2021 Statement

EPH Enterprises Pty Ltd (Australian registered business number 57 109 822 246) and its associated entities ('EPH') respect ethical labour practices and promote, employment diversity. Consistent with these principles, EPH takes a zero-tolerance approach to any form of modern slavery in its operations or supply chains.

This statement, which is intended to meet the requirements of sections 13 to 16 of the Modern Slavery Act 2018 (Cth) C2018A00153, describes steps taken by EPH between 31 December 2020 to 30 June 2021 as part of its efforts to decrease the risk of modern slavery taking place in its operations or supply chains.

EPH Organisational Structure, Business and Supply Chains:

EPH was originally formed as small equipment Plant Hire Agency in 1996 under the leadership of our present Chief Executive Officer and Director, Michael and David Willson.

After successfully working on the Eastern Freeway Extension in 2004, Craigieburn and Hallam Bypass, EPH was appointed as the preferred cartage organiser for the \$2.5 Billion Eastlink Project.

This range of exclusive industry experiences developed EPH into one of Australia's premier earthmoving agencies and was the catalyst for our involvement in future major projects such as the M80 Upgrade, West Gate Tunnel Project, Deer Park Bypass and Nagambie Bypass.

EPH provides a diverse range of services to clients across the east coast of Australia, including:

- Soil material disposal;
- Clean fill site management;
- Structural fill removal and supply; and
- Reclamation and remediation.

To deliver these services, EPH works with an extensive network of subcontractors and its associated entities. EPH's supply chain consists of EPH offering and coordinating subcontractors to an array of service opportunities within its region of operation. Once the work is complete, the subcontractors issue EPH an invoice for their services and are paid by EPH accordingly. The internal EPH employees are administrative and facilitate the allocation of work to subcontractors.

Currently EPH has offices in Victoria, New South Wales and Queensland. In each of these locations, EPH has an Accounts, Operations, Sales and Administration Department. In Victoria, the Human Resources, Finance and General Management Departments are based. As of 30 June 2021, EPH employed 73 employees.

EPH's associated entities, who are not referenced in the remaining content of the report or its reporting purposes, are ESG Services Pty Ltd ('ESG') and Willson Plant & Equipment Pty Ltd ('WPE').

Due diligence and remediation processes:

EPH Code of Conduct and Policies:

EPH invests considerable time and expertise to make a positive contribution in all cities of which it operates in. As such, EPH has put in place an array of policies and procedures, plus a Code of Conduct, to support this aim. EPH's position on ethical labour and the elimination of modern slavery is supported in these documents.

All employees across EPH and its associated entities, are expected to follow the expectations set out in these documents. EPH considers that the implementation of these documents fosters an ethical culture and environment in which modern slavery or abuse is unacceptable.

Employees and Recruitment:

EPH's Code of Conduct and policies, outline how EPH addresses employment related activities under the Modern Slavery Act 2018 (Cth) C2018A00153. These include:

EPH Code of Conduct: The purpose of this document is to establish a defined standard of behaviour which is expected of EPH employees. The objective is to assist employees in understanding what is acceptable and unacceptable behaviour in the workplace. The Code includes expectations that employees are to act in accordance with Australian legislation and uphold the principles of equal employment opportunity.

- *Equal Employment Opportunity: Anti-Discrimination, Harassment and Bullying Policy:* The purpose of this policy is to support employees and its stakeholders to work in an environment that is free from unlawful discrimination and bullying due to perceived diversity differences;
- *Grievance Resolution Policy:* This policy establishes the procedure for resolving complaints, issues, concerns or grievances in relation to work or the work environment. Including however not limited to, complaints of modern slavery in its subcontractor network and internal employment relations;

- *Recruitment and Selection Policy:* The purpose of this policy is to establish procedures and guidelines for the fair recruitment of applicants based on merit and selection criteria. Candidates are selected on the basis that they have the skills, experience and qualifications required to perform the required tasks for their allocated position; and
- *Anti-Human Trafficking and Modern Slavery Policy:* The purpose of this policy is to clarify EPH's zero-tolerance towards any form of modern slavery or abuse internally, and throughout its subcontractor network.

Breaches of EPH's Code of Conduct and/or any of the above-mentioned policy, are handled effectively and efficiently in line with EPH's Disciplinary policy. EPH takes allegations of breaches and non-compliance seriously. EPH investigates allegations of breaches and non-compliance, and addresses such matters reasonably, fairly, and swiftly.

Learning and Development:

EPH educates employees on its expectations within the Code of Conduct and its policies through periodic training.

Subcontractors:

EPH subcontractors are provided with an 'Operator Pack' with a set of subcontractor specific expectations regarding their conduct when working for EPH. Supplementary documentation within the Operator Pack, highlights that subcontractors are to act respectfully and completely comply with Australian legislation.

Upon commencement, EPH advises subcontractors that EPH is entitled to randomly and periodically audit the delivery of their service. If EPH finds a subcontractor has acted inconsistently with the obligations and expectations set out in their Operator Pack, EPH responds with disciplinary action or the termination of their relationship.

Risk Assessment and Management Procedures:

EPH's risk assessment and management procedures are designed to support their zero-tolerance towards modern slavery or abuse. Supporting this aim, EPH undertook the following activities over the last twelve months:

- July 2020: EPH wrote and published the first version of their *Anti-Human Trafficking and Modern Slavery* policy. This was then communicated to all EPH employees and is now provided upon the commencement of their employment with EPH.
- July 2020: EPH revised their Operator Packs to ensure that they complied with their updated policies pertaining to the Modern Slavery Act 2018 (Cth) C2018A00153. The Operator Packs, now outline EPH's expectation that subcontractors are to comply with the legislation and the procedure for breaches or non-compliance.

- February 2021: EPH revised their Employee Policies and Procedures in line with current legislation, and issued a copy of all Policies and Procedures to its Employees.
- April 2021: EPH Human Resources conducted 'Sexual Harassment in the Workplace' with all of its Managers.
- June 2021: EPH Human Resources conducted 'Culture – Why it Matters' with all of its Managers which highlight the necessity of creating a supportive, inclusive and safe work environment for Employees.

Statement consultation:

EPH is committed to continually improving and evaluating the effectiveness of their activities towards preventing modern slavery or abuse. EPH will endeavour to understand and manage their mission against modern slavery by dedicating resources to researching ways to manage risks. EPH will consult their associated entities and industry representatives to identify, implement and assess initiatives for the purposes of performing their due diligence to mitigate the risks of partaking in modern slavery.

Currently and in the future, EPH will annually review and update their Code of Conduct, and policies to ensure that they remain appropriate plus relevant. EPH will assess how effective these documents had been during the previous financial year to preventing modern slavery and make amendments where their effectiveness could be improved.

EPH has made this Modern Slavery Statement pursuant to sections 13 to 16 of the Modern Slavery Act 2018 (Cth) C2018A00153. This Statement represents EPH stance on modern slavery and abuse for the period of 31 December 2020 to 30 June 2021.

For future information or enquiries, contact Human Resources at heckmane@ephgroup.com.au

This Statement was approved by the board of EPH Enterprises Pty Ltd in their capacity as principal governing body of EPH Enterprises Pty Ltd on the 26th of May 2022. This Statement was signed by Michael Willson in their role as the Chief Executive Officer on the 21st of July 2022.



Michael Willson

Chief Executive Officer

On behalf of EPH Enterprises Pty Ltd

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