

**JOINT
MODERN
SLAVERY
STATEMENT
2021**

ACKNOWLEDGEMENT OF COUNTRY

DELTA GROUP ACKNOWLEDGES FIRST NATIONS AUSTRALIANS AS THE TRADITIONAL OWNERS OF THE LAND AND SEA UPON WHICH WE WORK. 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 RECOGNISE THAT SAMENESS IS A MYTH AND SEEK TO ACHIEVE EQUALITY THROUGHOUT OUR BUSINESS AND ALL RELATED ENTITIES.

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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 2021.

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

Established in Victoria since 1988, Delta Group now operates in all States and Territories of mainland Australia with offices in Darwin, Brisbane, Sydney, Canberra, Melbourne, Adelaide and Perth, as well as regional branches in Karratha, Latrobe Valley, Geelong, Port Pirie, Illawarra and Hunter Valley.

Today, Delta Group is one of the largest diversified contractors of our type in the world, with the financial, operational and organisational capacity to manage hundreds of projects at any one time - Australia wide.

We have the scale and systems to mobilise our people and plant to meet the demands of any project in any location - metro, regional, remote or marine.

“ DELTA GROUP IS ONE OF THE LARGEST DIVERSIFIED CONTRACTORS OF OUR TYPE IN THE WORLD TODAY, WITH THE FINANCIAL, OPERATIONAL AND ORGANISATIONAL CAPACITY TO MANAGE HUNDREDS OF PROJECTS AT ANY ONE TIME - AUSTRALIA WIDE. ”

JOINT STATEMENT

Delta Group welcomes the opportunity to join the Australian Government 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.

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.

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.

With reference to our Joint Modern Slavery Statement 2020, we have adopted a 'continuous improvement' approach to compliance and report on the progress of key actions from 2020, as well as new measures to further mitigate and, where possible, eliminate any risk of modern slavery across our business and all related entities.

This Joint Statement was approved by Con Petropoulos; Sole Director of Delta Group Holdings Pty Ltd, in the capacity of Principal Governing Body and as the parent entity of Delta Pty Ltd on 20 December 2021.



Con Petropoulos
DIRECTOR
DELTA GROUP HOLDINGS PTY LTD
20 December 2021

“ 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. ”



STRUCTURE

Delta Group specialise in the design and delivery of high risk contracting services for industrial and commercial market sectors, including Closure Studies & Decommissioning, Deconstruction & Demolition, Civil Engineering & Construction, Landscaping & External Works, Waste Management & Resource Recovery, Materials Solution Management, Site Remediation, Rehabilitation & Revegetation, Heavy Plant Hire, Specialist Marine and Disaster Response.



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

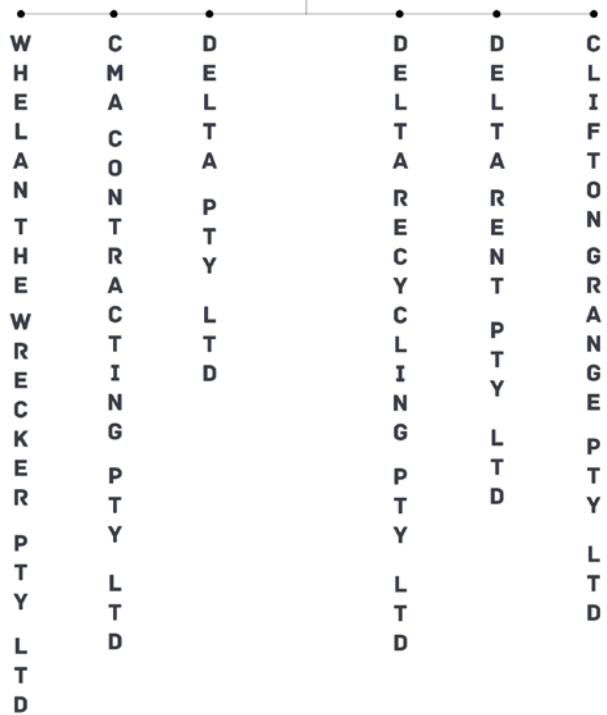
DELTA PTY LTD is limited by shares, incorporated and domiciled in Australia.

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

STRUCTURE

Delta Group’s operational structure comprises six related entities under common control. Each entity operates across key market sectors in Australia, with specific market segments and/or services differentiating them from other Group entities.

Under the Act, Delta Pty Ltd is a (joint) reporting entity with Delta Group Holdings Pty Ltd.



DELTA PTY LTD
CMA CONTRACTING PTY LTD
WHELAN THE WRECKER PTY LTD

- Closure Studies
- Decommissioning
- Deconstruction & Demolition
- Civil Engineering & Construction
- Site Remediation
- Asbestos & Hazmat Removal
- Specialist Marine, Drilling & Blasting
- Disaster Response
- NPI Building & Construction
- Materials Solution Management

DELTA RECYCLING PTY LTD

- Waste Management
- Resource Recovery
- Contract Crushing & Screening
- Transport & Logistics

CLIFTON GRANGE PTY LTD

- Site Preparation Services
- Contamination (Soil) Treatments
- Water Treatments
- Site Revegetation

DELTA RENT PTY LTD

- Heavy Plant Hire

VISION, MISSION & VALUES



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.

ABOVE & BEYOND

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.



STRUCTURE

Our vision, mission and values have been designed to establish a common purpose for all staff across all divisions and related entities of Delta Group.

Our structure incorporates key divisions based upon operational (entity specific) and geographical (State/Territory specific) contracting services, with an executive management team responsible for Group wide culture and performance.

CONTRACTING DIVISIONS

- Demolition
- Civil
- Landscaping
- Environmental
- Industrial
- Transport & Logistics
- Waste Management
- Resource Recovery
- Plant Hire
- Fleet Management
- QSE (OHS/WHS)
- Corporate Services

OPERATING DIVISIONS

- Victoria
- New South Wales
- Queensland
- Northern Territory
- Western Australia
- South Australia
- Australian Capital Territory



CON PETROPOULOS - MANAGING DIRECTOR

Con founded Delta in the late 70s and has been relentless in his pursuit of innovation ever since, especially for better and safer work methods. Renowned for his leadership and the quality of his people, he is still 'hands-on' today in support of major projects, industrial relations and key client relationships.



JASON SIMCOCKS - CHIEF EXECUTIVE OFFICER

Since joining Delta Group in 2001 Jason has been a driving force in our growth and expansion across Australia. As CEO, Jason works closely with Con and the senior management team to set and steer our commercial strategies, as well as to maintain the culture and values that have made Delta who we are today.



MARK WELSH - CHIEF OPERATING OFFICER

Mark arrived as a Project Engineer in 2004 and within 3 years had assumed leadership of some of our largest and most demanding civil projects. As COO Mark is responsible for maintaining exceptional HSE standards across hundreds of project sites Australia wide, including industrial relations for all related entities of Delta Group.



JATIN RANGRAS - CHIEF FINANCIAL OFFICER

Jatin was appointed CFO in 2016 with a diverse portfolio of financial management and accounting experience across public and private sectors in Australia. Jatin manages an array of key relationships and leads a team of professionals to maintain strong system controls, including quality and risk management.



DANNY BUSATTA - GM PRE CONSTRUCTION

Having joined Delta in 1993 Danny is our second longest serving executive team member with 28 years experience in high risk industrial and commercial demolition works. Today Danny leads our Pre Construction teams and ensures our reputation for safety remains a focus of any and all future bids.



JASON ATTARD - GM OPERATIONS (CIVIL)

As GM Operations (Civil) and with more than 20 years of experience, Jason draws upon his working knowledge of project planning, QSE/HSE management systems, regulatory compliance and client relationships to oversee our extensive and growing civil construction division Australia-wide.



DOMINIC SANTULLO - GM RECYCLING & LOGISTICS

With a quarter of a century in recycling, transport and logistics, Dominic's knowledge of HVNL and NHVR compliant operating policies, procedures and practices is second to none. He is responsible for the maintenance, operation and deployment of more than 1,000 heavy vehicles and machines Australia wide.



PHILIP AGIUS - GM RENT

Phil has made a lasting impact on Delta over his 20 years in a variety of divisions. His knowledge and understanding of operational and corporate policies, procedures and practices is a key strength in his role as GM of our heavy plant hire division and the safe deployment and operation of high risk machinery.

OPERATIONS

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

        	CLOSURE STUDIES & DECOMMISSIONING	U R B A N	COMMERCIAL	    	 MULTIPLEX HANSENYUNCKEN Built. Charter Hall  BORAL™ ICON JOHN HOLLAND PROBUILD		
	DECONSTRUCTION & DEMOLITION		PUBLIC INFRASTRUCTURE				
	CIVIL ENGINEERING & CONSTRUCTION		HEALTH & AGED CARE				
	LANDSCAPING & EXTERNAL WORKS		RETAIL & HOSPITALITY				
	WASTE MANAGEMENT & RESOURCE RECOVERY		RESIDENTIAL				
	MATERIALS SOLUTION MANAGEMENT		I N D U S T R I A L		MINERALS	    	BHP RioTinto GLENCORE  Hydro 
	SITE REMEDIATION & REHABILITATION				OIL & GAS		
	HEAVY PLANT HIRE				ENERGY		
SPECIALIST MARINE & DISASTER RESPONSE	RENEWABLES						
	MANUFACTURING & QUARRYING						

OPERATIONS

Urban (commercial) contracting services represent up to 80% of consolidated Group revenue.



URBAN



INDUSTRIAL



CONTRACTING

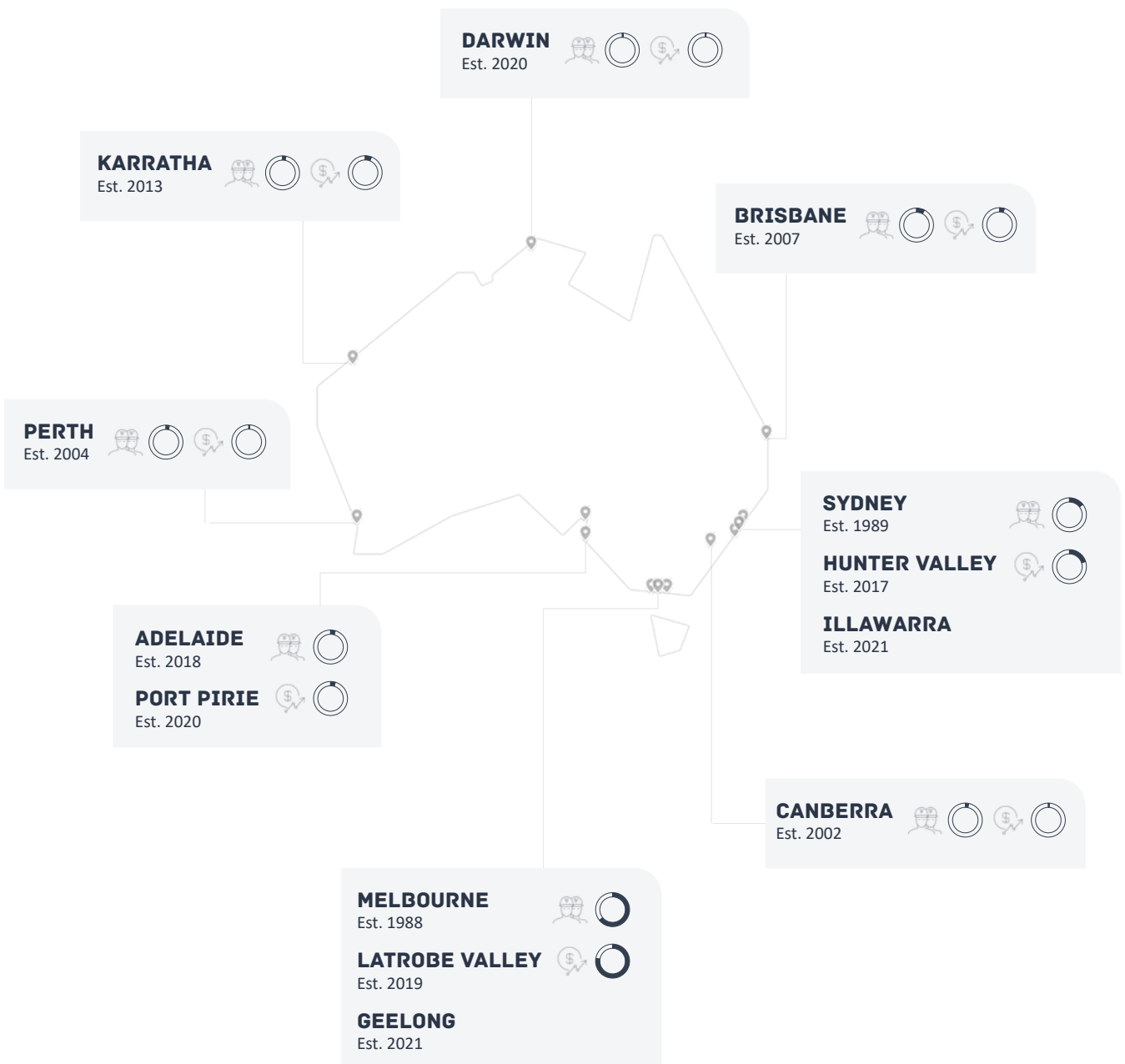


RENTAL



RECYCLING

Established in Victoria since 1988, Delta Group now operates in all States and Territories of mainland Australia with offices in Darwin, Brisbane, Sydney, Canberra, Melbourne, Adelaide and Perth, as well as regional branches in Karratha, Latrobe Valley, Geelong, Port Pirie, Illawarra and Hunter Valley. Our Victorian operations contribute more than 60% to consolidated Group revenue and represent more than 60% of our national workforce.



OPERATIONS

Delta Group have the scale and systems to mobilise our people and plant to meet the demands of any project in any location: metro, regional, remote or marine.



1000+
EXPERIENCED &
QUALIFIED STAFF



1000+
FLEET OF SPECIALIST
PLANT & EQUIPMENT



650+
MILLION ANNUAL
TURNOVER

We operate 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 GPS, logistical and scale systems track the movement and loads of more than 1,000 trucks and machines across Australia.

505
excavators

12 79 75
20-29t 30-39t
>120t 15 16 61
60-69t 80-89t 40-49t
54 9 **184** **<10t**
10-19t LONG REACH & TELESCOPIC

98 **110**
heavy rigid dump
& heavy combo trucks
33
water trucks

77 **32** **128**
front end dozers
loaders **37** skid
crushers steers
34 **15** **12**
rollers & screens drill
& compactors rigs

1000
hook &
marrel
skip bins

NOTHING MATTERS MORE TO US THAN SAFETY. IT IS OUR MOST IMPORTANT BUSINESS PRACTICE AND WE DEMAND VISIBLE LEADERSHIP AT EVERY STAGE OF A PROJECT AND FROM EVERYONE INVOLVED.

RIGHT FIRST TIME AND THE BEHAVIOURS WE EMPHASISE ARE BUILT UPON FIVE SAFETY ESSENTIALS. THESE SAFETY ESSENTIALS ARE INTEGRAL TO THE SAFE WORK POLICIES, PROCEDURES, METHODS AND PRACTICES THAT WE HAVE DEVELOPED TO PROTECT OUR PEOPLE AND OUR SUBCONTRACTORS FROM SERIOUS HARM.

THINK

before you start

STOP

if you feel unsafe

INTERVENE

if you see an unsafe act

WEAR

the correct PPE

FOLLOW
the rules





MODERN SLAVERY RISK ASSESSMENT

The consequences of the COVID-19 pandemic and corresponding 'two-speed' roll out of inoculations for developing nations and their vulnerable populations is profound.

According to the latest global estimates, 160m children are engaged in child labour, with a further 25m adults and children subjected to forced labour.

New analysis from International Labour Organization and UNICEF indicates that an additional 8.9m children will be in child labour by the end of 2022 as a result of rising poverty caused by the Coronavirus pandemic.

Key to our Modern Slavery Risk Assessment is a literature review that was undertaken to better understand supply chain risks for Delta Group, at home and abroad. The more we know of current (and changing) Modern Slavery risks the better we can communicate with and manage our predominantly domestic supply chains. Our literature review included (but was not limited to):

- 2020 List of Goods Produced by Child Labour or Forced Labour; USA Department of Labor
- Child Labour Global Estimates, Trends & The Road Forward; International Labour Organization and UNICEF
- Trafficking In Persons Report 2021; USA Department of State
- The Global Slavery Index 2018; Walkfree Foundation
- Tackling Modern Slavery: Current Legislative & Commercial Strategies; Project OAASIS, University of Sydney
- Global Report on Trafficking In Persons 2020; United Nations Office On Drugs & Crime
- Uyghurs For Sale, 'Re-education', forced labour and surveillance beyond Xinjiang; Australian Strategic Policy Institute
- In Broad Daylight; Uyghur Forced Labour & Global Solar Supply Chains, Helena Kennedy Centre for International Justice, Sheffield Hallam University

“ THE COVID-19 CRISIS THREATENS TO FURTHER ERODE GLOBAL PROGRESS AGAINST CHILD LABOUR UNLESS URGENT MITIGATION MEASURES ARE TAKEN. NEW ANALYSIS SUGGESTS A FURTHER 8.9 MILLION CHILDREN WILL BE IN CHILD LABOUR BY THE END OF 2022 AS A RESULT OF RISING POVERTY DRIVEN BY THE PANDEMIC. ”

CHILD LABOUR GLOBAL ESTIMATES 2020, TRENDS & THE ROAD FORWARD; INTERNATIONAL LABOUR ORGANIZATION & UNICEF

MODERN SLAVERY RISK ASSESSMENT

Analysis of the 2020 List of Goods Produced by Child Labour or Forced Labour by the US Department of Labor indicates no material change has occurred to the global supply chain risks reported in our 2020 Modern Slavery Statement. Nonetheless, ongoing review of the (annual) publication focuses attention on the nature and scope of global Modern Slavery risks relevant to Delta Group operations.



PRODUCT & SERVICE RISKS (BY # OF COUNTRIES)

-  **21** BRICKS
-  **19** TEA & COFFEE
-  **15** COTTON
-  **13** GARMENTS, GLOVES, TEXTILES, THREAD/YARN
-  **6** MINERALS
-  **6** TIMBER
-  **6** RUBBER
-  **3** FURNITURE
-  **2** ELECTRONICS

GEOGRAPHIC RISKS (BY # OF PRODUCTS & SERVICES)

-  **8** BRICKS, COTTON, ELECTRONICS, GARMENTS, GLOVES, NAILS, TEXTILES, THREAD/YARN
-  **8** BRICKS, COFFEE, FURNITURE, GARMENTS, RUBBER, TEA, TEXTILES, TIMBER
-  **6** BRICKS, CARPETS, COTTON, GARMENTS, THREAD/YARN, TEXTILES
-  **5** BRICKS, COFFEE, COTTON, GARMENTS, TIMBER
-  **3** ELECTRONICS, GARMENTS, RUBBER GLOVES

SECTOR & INDUSTRY RISKS

-  **MANUFACTURING**
BRICKS, CARPETS, ELECTRONICS, GARMENTS, GLOVES, NAILS, TEXTILES, THREAD/YARN
-  **AGRICULTURE**
COFFEE, COTTON, RUBBER, TEA, TIMBER
-  **MINING**
COBALT, DIAMONDS

Source: USA Department of Labour, List of Goods Produced by Child Labour or Forced Labour

MODERN SLAVERY RISK ASSESSMENT

ENTITY RISKS

As part of our literature review and referencing *Uyghurs for sale, 'Re-education', forced labour and surveillance beyond Xinjiang*, from the Australian Strategic Policy Institute, we have identified a number of entity risks involving the manufacture of electronics and garments that may be linked to our domestic supply chains.



MANUFACTURING ENTITIES

- KTK Group (Jiangsu Jinchuang Group)
- O-Film Technology Co. Ltd
- Nanjing Synergy Textiles Co. Ltd
- Victory City International Holdings Ltd
- Youngor Textile Holdings Co. Ltd
- Youngor Group Co. Ltd
- Huaifu Top Dyed Melange Yan Co. Ltd
- Highbroad Advanced Material (Hefei) Co. Ltd
- Hefei Fuying Photoelectric Co. Ltd
- BOE Technology Group Co. Ltd
- Hubei Yihong Precision Manufacturing Co. Ltd
- Dongguan Yidong Electronic Co. Ltd
- Hefei Bitland Information Technology Co. Ltd
- Sichuan Mianyang Jingweida Technology Co. Ltd
- Foxconn Technology
- Avary Holding Co. Ltd
- Shandong Zoucheng Guosheng
- Jiangsu Guotai Guosheng Co. Ltd
- Jiangsu Guotai International Group
- Yecheng County Xiaoxiang Textile Co. Ltd
- Qingdao Jifa Huajin Garment Co. Ltd
- Qingdao Jifa Group
- Changji Esquel Textile Co. Ltd



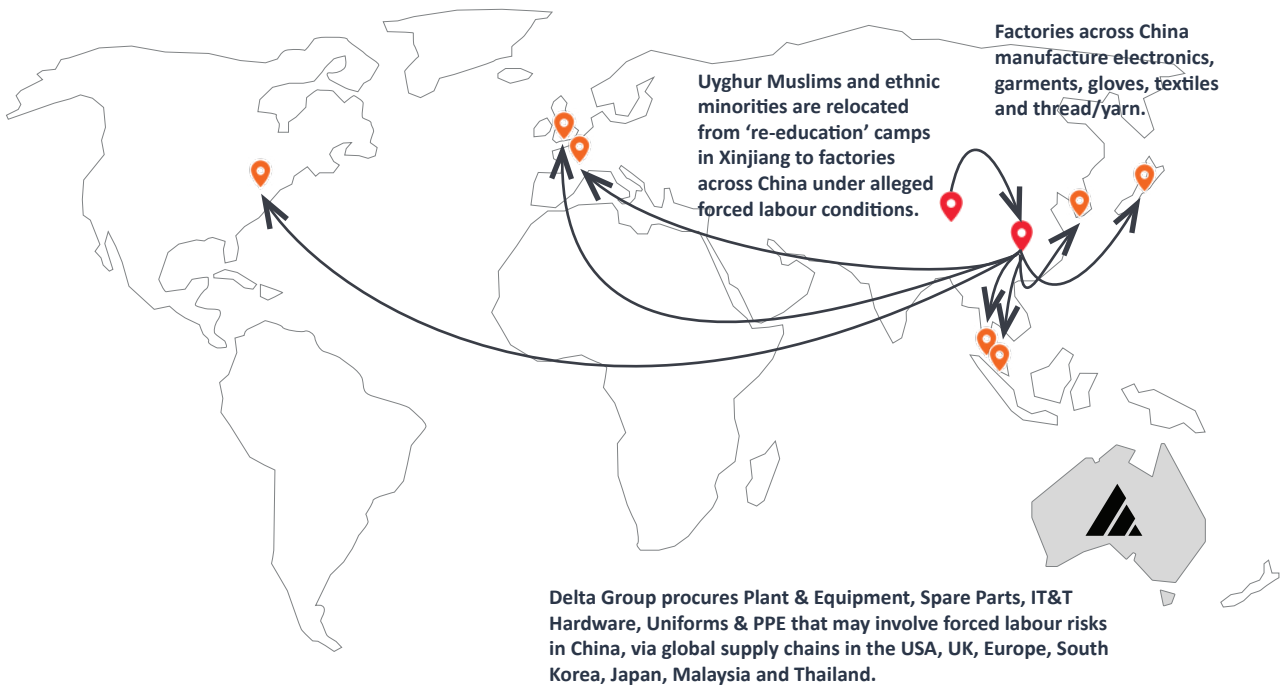
PRODUCT ENTITIES

- Apple
- Samsung
- HP
- Dell
- Cisco
- Microsoft
- Lenovo
- LG
- Haier
- Hisense
- Panasonic
- Sharp
- Toshiba
- Japan Display Inc
- Hitachi
- Bosch

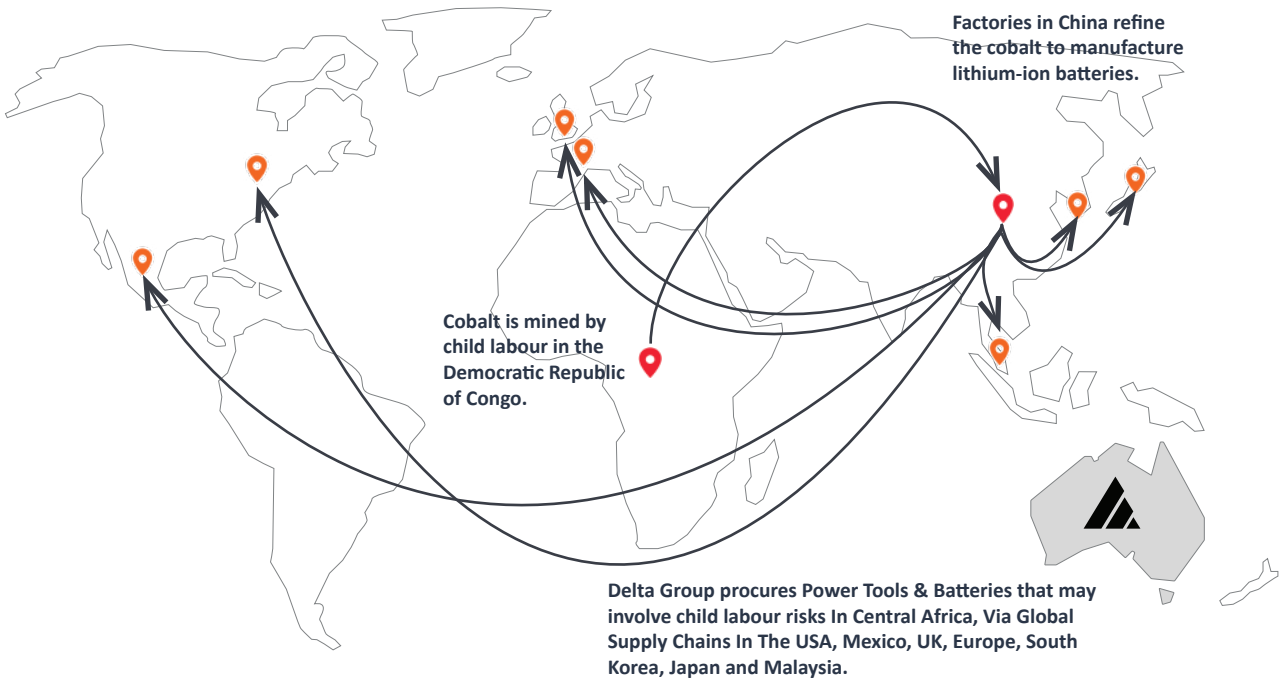


Source: Australian Strategic Policy Institute, *Uyghurs For Sale, 'Re-education', Forced Labour & Surveillance Beyond Xinjiang*

ASKING THE RIGHT QUESTIONS



Source: Australian Strategic Policy Institute, Uyghurs For Sale, 'Re-education', Forced Labour & Surveillance Beyond Xinjiang & USA Department of Labour, List of Goods Produced by Child Labour or Forced Labour



Source: USA Department of Labour, List of Goods Produced by Child Labour or Forced Labour

DELTA GROUP GLOBAL & DOMESTIC SUPPLY CHAINS



USA & MEXICO

Heavy Plant, Equipment & Spare Parts
Power Tools & Batteries
Geotextiles & Waterproofing Membranes
Light Vehicles & Spare Parts
IT&T Hardware

UK & EUROPE

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

Delta Group works directly with more than 2,000 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.

We estimate that more than 95% of goods and services procured by Delta Group and its related entities are sourced from within Australia, with a range of goods manufactured in China, India, Thailand, Indonesia, Malaysia, Taiwan, Japan, Korea, UK & Europe, Mexico and the USA.

CHINA

IT&T Hardware
 Heavy Plant, Equipment & Spare Parts
 Power Tools & Batteries
 Steel Concrete
 Rubber
 Landscaping Supplies

Construction Materials
 Geotextiles & Waterproofing Membranes
 PPE & Face Masks
 Cleaning Products
 Uniforms
 Office Supplies & Furniture

JAPAN & SOUTH KOREA

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

INDIA & PAKISTAN

Construction Materials
 Landscaping Supplies
 Uniforms & PPE

TAIWAN

Power Tools & Batteries

MALAYSIA

IT&T Hardware
 Power Tools & Batteries

INDONESIA

Construction Materials
 Landscaping Supplies
 Rubber

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
 Cranage & Rigging
 Concrete, Asphalt & Steel Supply | Placement
 Uniforms & PPE
 Emergency & Disaster Response

Horticultural Design & Installation
 Arborist Services
 Electrical, Hydraulics & Plumbing Trades
 Archaeological & Cultural Surveys
 Labour Hire - Security, Cleaning, Traffic Management
 Training
 Lighting
 Office Furniture, Supplies & Consumables
 Accommodation & Travel
 Soil & Water Remediation
 Landscaping
 Construction Materials
 Waste Management & Landfill

DELTA GROUP RISK PROFILE

UNITED NATIONS GUIDING PRINCIPLES ON BUSINESS & HUMAN RIGHTS

Delta Group welcomes the opportunity to join the Australian Government 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.

Delta Group understands our obligations under the United Nations Guiding Principles on Business & Human Rights. In particular, that we and all commercial enterprises we do business with should respect human rights and avoid infringing on the human rights of others. In doing so, we will continue to comply with Australian law and meet our responsibilities to address adverse human rights impacts with which we are involved should they be identified in our business or supply chains.

Delta Group's policy for ethical labour and modern slavery demonstrates our respect for internationally recognised human rights, such as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.



Australian Government



UNITED NATIONS
HUMAN RIGHTS
OFFICE OF THE HIGH COMMISSIONER



International
Labour
Organization

CONSULTATION WITH CONTROLLED ENTITIES

In accordance with the Act, Executive and Senior Management from Delta Group and all related and controlled entities have been consulted in the preparation of our Joint Modern Slavery Statement 2021.

As previously, consultation took place by way of online (Microsoft Teams) meetings, email and telephone calls as a result of ongoing COVID-19 Public Health Orders and Border Restrictions.

A working group comprising key Executive Management over saw the production of this Joint Modern Slavery Statement prior to its approval by our Managing Director; in their capacity as Principal Governing Body under the Act.



DELTA GROUP RISK PROFILE

TYPES OF MODERN SLAVERY

The most 'at risk' types of Modern Slavery that Delta Group may contribute to or could be directly linked with involve Forced Labour, (the worst forms of) Child Labour, Servitude and Trafficking In Persons.

We will continue to review and monitor the various types of Modern Slavery, particularly Debt Bondage and risks that may emerge as those most vulnerable to human rights violations, persecution, war or violence are exploited by sophisticated offshore criminal syndicates in conjunction with unscrupulous labour hire operators.

FORCED LABOUR

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

CHILD LABOUR

Situations where children are exploited through slavery or similar practices, including for sexual exploitation; or engaged in hazardous work which may harm their health, safety or morals.

SERVITUDE

Situations where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work.

TRAFFICKING IN PERSONS

The recruitment, harbouring and movement of a person for exploitation through modern slavery.

DEBT BONDAGE

Situations 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.

SLAVERY

Situations where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.

FORCED MARRIAGE

Situations 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.

MOST RISK



LEAST RISK

DELTA GROUP RISK PROFILE

OPERATIONAL RISK

With a national workforce in excess of 1,000 qualified, trained and experienced personnel spanning all States and Territories across mainland Australia, Delta Group remains fully compliant with Fair Work Australia's National Employment Standards or the Modern Award equivalent in each State or Territory where our salaried staff are located.

Where applicable, staff may be employed 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.

In accordance with our statutory obligations, we maintain rigorous payroll and administrative processes to ensure all employee entitlements are current and up-to-date, including (but not limited to):

- Superannuation
- Long Service Leave
- Annual Leave
- Sick Leave
- Family & Domestic Violence Leave
- Personal & Carer's Leave

Similarly, Delta Group maintains strict Security of Payment policies and procedures in compliance with the Building Code 2016.

The risk that Delta Group, including all related entities, directly causes any type of Modern Slavery remains negligible.

DOMESTIC SUPPLY CHAIN 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 complete regulatory and statutory compliance. 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
- Statutory & Regulatory Compliance
- Safety Management (Statistics)
- Environmental Management (Statistics)
- Key Personnel
- Relevant Capabilities & Experience
- Plant & Equipment



FairWork
Commission












DELTA GROUP RISK PROFILE

PRODUCT/ SERVICE RISKS	GEOGRAPHIC RISKS	SECTOR RISKS	ENTITY RISKS*	REPORTING/ RELATED ENTITY	OPERATIONS
					
COTTON, GARMENTS, GLOVES, TEXTILES, THREAD/YARN	ARGENTINA, AUSTRALIA, BANGLADESH, BENIN, BRAZIL, BURKINA FASO, BURMA, CHINA, EGYPT, INDIA, KAZAKHSTAN, KYRGYZ REPUBLIC, MEXICO, NEPAL, PAKISTAN, THAILAND, TURKEY, TURKMENISTAN, UZBEKISTAN, VIETNAM	MANUFACTURING, RETAIL/WHOLESALE	CHINA, AUSTRALIA	ALL	PERSONAL PROTECTIVE EQUIPMENT, UNIFORMS
ELECTRONICS	AUSTRALIA, CHINA, MALAYSIA	MANUFACTURING, RETAIL/WHOLESALE	CHINA, AUSTRALIA	ALL	LCD TECHNOLOGY, IT&T HARDWARE
RUBBER	AUSTRALIA, BURMA, CAMBODIA, INDONESIA, LIBERIA, PHILLIPINES, VIETNAM	AGRICULTURE, RETAIL/WHOLESALE	AUSTRALIA	ALL	CONVEYOR BELTS, PLANT (EXCAVATOR) TRACKS, LIGHT VEHICLE TYRES
TIMBER	BRAZIL, CAMBODIA, PERU, RUSSIA, VIETNAM	AGRICULTURE, RETAIL/WHOLESALE	AUSTRALIA	ALL	PLYWOOD
DIAMONDS	ANGOLA, AUSTRALIA, CENTRAL AFRICAN REPUBLIC, DEMOCRATIC REPUBLIC OF CONGO, GUINEA, LIBERIA, SIERRA LEONE	MINING, RETAIL/WHOLESALE	AUSTRALIA	ALL	SAW CUTTERS
COBALT	DEMOCRATIC REPUBLIC OF CONGO	MINING, RETAIL/WHOLESALE	AUSTRALIA	ALL	POWER TOOLS & BATTERIES
LABOUR HIRE	AUSTRALIA	PROFESSIONAL SERVICES, TRADES	AUSTRALIA	ALL	SECURITY, TRAFFIC MANAGEMENT, CLEANING, OPERATORS & LABOURERS

* For the purpose of this table format Entity Risks identify the (geographic) location where risk assessments have been or will be undertaken.

DELTA GROUP RISK PROFILE

As previously stated, the risk that Delta Group, including all related or controlled entities, directly causes any type of Modern Slavery as a result of our operations is negligible. Analysis of survey and audit findings also indicates strong awareness and understanding of the Modern Slavery Act 2018 and the statutory obligations that apply to upstream and downstream entities across the Australian building and construction sector. Given the nature and scope of our supply chains and client base, together with our past, current and future actions, the risk that Delta Group is directly linked to Modern Slavery has been rated as medium. However, risks that we contribute to Modern Slavery remain as Medium-High. Further interrogation of our domestic retail or wholesale supply chains and their potential links to high risk products manufactured in high risk countries is required to identify specific entity risks. At which point Delta Group - in collaboration with our domestic suppliers - can apply leverage to eliminate Modern Slavery risks in our business.

				
CAUSE 	NEGLIGIBLE	NEGLIGIBLE	NEGLIGIBLE	NEGLIGIBLE
CONTRIBUTE 	MEDIUM-HIGH	MEDIUM-HIGH	MEDIUM-HIGH	MEDIUM-HIGH
DIRECTLY LINKED 	MEDIUM	MEDIUM	MEDIUM	MEDIUM



KEY ACTIONS

Australia, by nature of its geographical location and diminished domestic manufacturing sector, is particularly exposed to Modern Slavery risks throughout global supply chains, particularly those of our major trading partners in China as well as South and South East Asia that have been associated with Forced and/or Child Labour practices.

As identified in our 2020 Joint Modern Slavery Statement, Delta Group has initiated a range of key actions designed to address Modern Slavery risks in our operations, including all related/controlled entities.

These actions will be complemented by those identified in this, our 2021 Joint Modern Slavery Statement. Namely:

- Understanding the level of exposure to Forced Labour risks in the manufacture of garments and electronics in China that may involve (documented) exploitation of Uyghur Muslims and other ethnic minorities.
- Investigating the likelihood that Delta Group contributes to or is directly linked with Child Labour risks in the mining of raw materials (cobalt) used in the manufacture of lithium ion batteries.
- Establishing relationships with qualified, trained and experienced third parties to develop an Ethical & Social Procurement Framework, including verified risk assessment and auditing protocols.

Audits identified in our 2020 Joint Modern Slavery Statement involved targeted self assessment questionnaires to determine if our initial (and inherent) risk assessment warrants further investigation and action. Where relevant, these additional actions are identified for attention in FY22. Similarly, where we have determined low or negligible risk, those actions have been closed out.

“ TRUE BUSINESS LEADERS KNOW THAT CREATING SUSTAINABLE SUPPLY CHAINS CAN CONTRIBUTE POSITIVELY TOWARDS GROWTH, IMPROVE COMPETITION, PROVIDE JOB OPPORTUNITIES, AND BRING FAMILIES OUT OF POVERTY. THIS IS A SUSTAINABLE BUSINESS MODEL. ”

THE GLOBAL SLAVERY INDEX 2018;
WALKFREE FOUNDATION

KEY ACTIONS

Combined, our literature review and self assessment questionnaires have helped determine the highest risk products or services from the highest risk sectors and industries in the highest risk countries. As a result, we are now better positioned to collaborate with our supply chain partners and to investigate if high risk entities exist in our respective operations.

ETHICAL & SOCIAL PROCUREMENT FRAMEWORK:

The development of a stronger, transparent and more effective Ethical & Social Procurement Framework is closely linked to our stated Governance & Policy commitments from 2020 and will enable Delta Group and all related or controlled entities to better manage Modern Slavery risks. Key actions for 2022 include (but are not limited to):

- Responsible Business Alliance Membership
- ISO 37301 Compliance Management System Development
- Prequalification Process Mapping (Ongoing)
- Contracts Review (Ongoing)
- Management Training & Staff Induction Program (Ongoing)



HIGH RISK PRODUCT ASSESSMENTS

Following our initial (inherent) 2020 risk assessment we have identified specific suppliers and manufacturers of Diamond Tipped Saw Cutters, Nails and Delta Group Uniforms & PPE. We will collaborate with our domestic retail and/or wholesale suppliers to understand what, if any, entity risk assessments need to be made. New products have been identified as a result of our literature review as well as COVID-19. We will explore if the supply of our Power Tools & Batteries and Face Masks involve Modern Slavery risks.



HIGH RISK GEOGRAPHIC ASSESSMENTS

Delta Group invests heavily in the procurement of IT&T Hardware such as servers, mobile phones, laptops, personal computers (desktop PCs) and monitors. Similarly, the application of LCD Technology is extensive and includes a wide variety of products across Delta Group operations. We will undertake due diligence of our existing (domestic) supply chains to understand what they and the manufacturers of key electronic components are doing to mitigate Modern Slavery risks attributed to the (mis) treatment and alleged exploitation of Uyghur Muslims and other ethnic minorities in China.



TRACKING & MEASUREMENT

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 + Self Assessment (Risk) 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

GOVERNANCE & POLICY

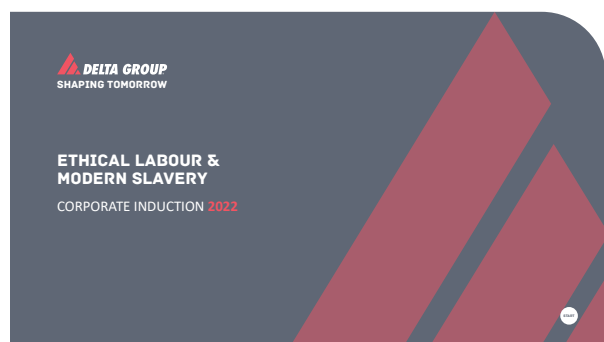
We completed a review of Delta Group policies:

- Ethical Labour & Modern Slavery
- Grievance
- Whistleblower

New and/or reviewed policies have been approved by executive management and communicated to Group personnel.

Our Staff Induction program was developed and is ongoing at the time of publication. All new staff are inducted to all Delta Group policies and, in particular, our obligations under the Modern Slavery Act 2018.

Our Management Training and Contracts Review are ongoing at the time of publication and we have engaged a qualified third party consultant to support the development of our proposed Ethical & Social Procurement Framework.



TRACKING & MEASUREMENT

SUPPLY CHAINS

Mapping of our Prequalification Processes began and is ongoing at the time of publication, with further actions to be completed in 2022. 50% of our proposed supplier self assessment questionnaires were completed, including:

- Our domestic Labour Hire suppliers for the provision of Plant Operator, Site Labour, Traffic Management, Security and Cleaning services were assessed and found to comply with all statutory obligations under the Fair Work Act 2009, Building Code 2016 and/or the relevant State or Territory Modern Award.
- Our domestic partners for the sale and recycling of scrap steel were assessed, with all partners confirming their compliance with the Modern Slavery Act 2018 as reporting entities (under the Act).
- Our domestic supply chains for rubber products also involved enterprises that were reporting entities under (and compliant with) the Act.
- Final assessment of our supply chains for the procurement of Uniforms & PPE, Nails and Diamond Tipped Saw Cutters were ongoing at the time of publication.



MONITORING

The engagement of a qualified third party consultant will support ongoing work to develop internal audit protocols, as well as support our assessment of qualified external auditing systems and controls such as those provided by the Responsible Business Alliance and/or ISO 37301 Compliance Management System certification, as identified previously.

Internal policies were also developed to ensure we maintain preferred supplier relationships for high risk products such as bricks, timber, tea and coffee. Wherever possible we will preference 'Australian Made' products or ensure that (offshore) products are recognised by third party accreditation schemes such as the Rainforest Alliance and UTZ Certification.



Responsible Business Alliance

Advancing Sustainability Globally



MANDATORY REPORTING CRITERIA

MANDATORY CRITERIA	DELTA GROUP JOINT STATEMENT
Identify the reporting entity	PageS 1, 4
Describe the reporting entity's structure, operations and supply chains	Pages 4-11, 17-18
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 13-16, 19-24
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 26-29
Describe how the reporting entity assesses the effectiveness of these actions	Pages 28-29
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 19
Provide any other relevant information:	n/a



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