

CRITERION 1 AND 2 – IDENTIFY REPORTING ENTITY, STRUCTURE, OPERATIONS AND SUPPLY CHAINS

REPORTING ENTITIES AND STRUCTURE

RARD No. 3 Pty Ltd A.C.N 618 271 542 (**RARD No. 3**) is an Australian family owned and operated business with its principal place of business and head office in Yeerongpilly, Brisbane. RARD No.3 controls a group of companies involved in a broad range of business operations. The subsidiaries of RARD No. 3 include companies branded under the “Canstruct” and “MFIC” business names.

The reporting entities in the Group for the reporting period ending 30 June 2023 are Canstruct International Pty Ltd (**Canstruct**), and RARD No.3 as the parent entity (**Group**). As at 30 June 2023, the Group had 18 employees.

OPERATIONS

The activities undertaken by the Group include:

- Direct employment of workers;
- Provision and delivery of services necessary to the operation of remote workplaces, i.e., facilities management operations including cleaning, cooking and accommodation;
- Construction;
- Financial investments;
- Manage and operate joint ventures;
- Acquisition and leasing of property including retail shops, commercial and industrial facilities; and
- Charitable activities.

(“**Operations**”)

SUPPLY CHAINS

The Operations of the Group in the financial year ending 30 June 2023 were conducted in Australia and the South West Pacific region.

In the reporting period, the Group had a supply chain made up of approximately 40 key suppliers and service providers. The majority of these suppliers were located in Australia.

The Group’s suppliers vary from small Australian family operated businesses to large corporates. Products and services that we procured included construction materials, labour, ICT products and office supplies, food products, consumables and equipment, laundry products, fuel, freight forwarders, aircraft charters, telecommunications and vehicles and parts.

CRITERION 3 - IDENTIFYING MODERN SLAVERY RISKS IN OUR SUPPLY CHAINS

RISKS OF CAUSING OR CONTRIBUTING TO MODERN SLAVERY PRACTICES

The Group has zero tolerance for any form of modern slavery. We promote a values-based culture, and we are committed to acting ethically in all aspects of our business, including by having practices and procedures in place to minimise these risks. The Group also requires its staff to undertake training to raise awareness of modern slavery, to identify modern slavery risk factors and how to report any suspected incidences of modern slavery should it arise.

The Group has a modern slavery policy, with its principal objectives including to model a culture of ethical behaviour by conducting business with stakeholders that share our values and maintaining policies and plans that promote ethical and legally compliant business conduct and that contribute to prevent modern slavery.

RISKS OF BEING DIRECTLY LINKED TO MODERN SLAVERY PRACTICES

We have identified products and services that we procure that may fall within categories of industries or products that are considered to be at higher risk of modern slavery practices. These include, for example, labour hire, construction materials, ICT equipment, food products and services, and laundry and cleaning services. We continue to procure these types of products and services as part of our ongoing operations.

While the majority of our suppliers are located in Australia, we acknowledge greater visibility on the origin of products is required. Identification of the origins of the products and services that we procure relies on our suppliers' willingness to engage with us in an open and transparent way and the capability and maturity of their own modern slavery response.

CRITERION 4 – ACTIONS TAKEN TO ASSESS OR ADDRESS MODERN SLAVERY RISKS

During the reporting period, Canstruct's Modern Slavery Working Group reviewed its internal systems and practices across the business to assess its modern slavery response. Key actions implemented following this review included:

- Adoption of a Supplier Code of Conduct which sets out the social, environmental and ethical expectations of suppliers based on the UN Guiding Principles on Business and Human Rights.
- Improving existing procedures, and developing new procedures and systems, to reduce modern slavery risks occurring directly or indirectly in our operations and supply chains.

CRITERION 5 – ASSESSING THE EFFECTIVENESS OF ACTIONS

The Group's process for assessing the effectiveness of the Group's response to modern slavery risks described in its Modern Slavery Plan includes:

- Annual independent assessments of its human rights compliance, with external independent assessments to be undertaken every 3 years;
- Annual review of the Modern Slavery Policy, Modern Slavery Plan and related procedures;
- Annual audit of due diligence processes to track and measure:

- The number of due diligence questionnaires completed for engaged suppliers;
 - The number of risk assessments completed for engaged suppliers;
 - Whether risk mitigation procedures have been implemented for suppliers that are identified; in the risk assessment as medium and high risk suppliers;
 - The number of new supplier contracts that include modern slavery clauses; and
 - The number of medium or high-risk suppliers engaged;
- Annual senior management review of the effectiveness of the Group's actions.

CRITERION 6 – CONSULTATION WITH OWNED AND CONTROLLED ENTITIES

Consultation has occurred between RARD No.3 and Canstruct for the preparation of this statement. Canstruct is wholly owned by RARD No.3.

CRITERION 7 – ANY OTHER INFORMATION

Canstruct was established as a special purpose vehicle and ceased to trade during the reporting period. It is unlikely that the Group will continue to meet the threshold required for submitting modern slavery statements. However, upon future contracts being awarded and the resulting availability of resources, the Group intends to continue to implement and improve its modern slavery systems and practices consistent with its commitment to its values.

This statement was approved by the Board of RARD No.3 Pty Ltd on 11 December 2023.

Rory Murphy

[Rory Murphy \(Dec 11, 2023 11:39 GMT+10\)](#)

Rory Murphy

Chairperson

Modern Slavery Statement YE 30 June 2023 11 December 2023

Final Audit Report

2023-12-11

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