



KANE

MODERN SLAVERY STATEMENT FINANCIAL YEAR 2023 – 2024

Kane Constructions Pty Ltd
Kane Constructions (QLD) Pty Ltd
arete Australia

INTRODUCTION

The construction industry continues to stand as a significant player in the ongoing effort to address and fight against modern Slavery, with an estimated 18 percent of modern slavery victims are found in the industry globally (KMPG and Australian Human Rights Commission, 2020).

While Australia is fortunately among the least vulnerable countries to modern slavery globally, the industry and can do better and Kane reaffirms commitment to combating risk within our supply chain.

At the core of our values is a deep respect for human rights, which underpins our commitment to safety, sustainability, and the very essence of our business practices. We acknowledge the challenges and recognise the potential for positive change, as well as our collective ability to drive it. Together we can build a more just future, ensuring that every individual can enjoy the freedom they rightfully deserve.

WHO WE ARE

Kane Constructions is a leading mid-tier privately owned commercial construction company. We operate throughout the east coast of Australia with offices in Melbourne, Sydney, Brisbane, and Canberra with approximately 500 employees.

We operate across a diverse range of sectors including commercial, healthcare, aged care and retirement living, heritage and restoration, hi-tech research and laboratories, retail, education (tertiary, primary and secondary), community, sports & leisure, hospitality, industrial and defence.

We recognise our corporate responsibility extends beyond building great buildings. We invest in improving social outcomes in the communities we work in by partnering with organisations that align with our culture, and where we can make a meaningful contribution.





Service
Excellence



Continuous
Learning



The Right
Project Mix



Professional
& Hands-On



Owning It



Safe Working
Environment



Relationship
Building



Teamwork
& Collaboration



Entrepreneurial
Drive

Our way of doing business underpins everything we do

Trust

- Act with integrity and honesty at all times.
- Deliver on our promises.
- Maintain continuous dialogue with our clients, check-in and welcome feedback.
- Speak up when something is not right.

We Value People

- Safety is at the core of our business and forefront of everything we do. We will always look after each other.
- Actively engage in opportunities to enhance skills and capabilities. Kane will embrace it.
- Respect all people.

Our Unique Culture

- Own it – make the right decisions. We are empowered and supported.
- We balance corporate professionalism with hands-on involvement.

Entrepreneurial Drive

- Hold ourselves and our colleagues accountable.
- Continuously challenge and believe in ourselves.
- Exhibit drive – we are problem solvers first and foremost.
- Be open to learning and change.
- Enjoy winning and celebrate success.
- We will encourage innovation and be open to new ideas in order to further satisfy the needs and expectations of our clients.

Relationships

- Be open and supportive of colleagues – mentor and lead.
- Build our personal brand in the “Kane market”.
- Encourage teamwork, seek shared wins and create a mutual learning environment with all people.
- Develop positive relationships at all levels.

Social

- Consider not only for the economic consequences of your activities, but also for the social and environmental implications.
- Investigate and implement social initiatives where we can make a meaningful difference.

ASSESSING OUR SUPPLY CHAIN

Kane directly employs staff in various roles including Construction Managers, Safety Managers, Project Managers, Site Managers, Contract Administrators, Estimators, Design Managers, and Construction Workers, with all employees engaged under Workplace Agreements, relevant awards, and/or individual agreements.

Our supply chain is extensive and intricate, involving subcontractors and suppliers both directly and indirectly, responsible for delivering materials, equipment, and services essential for our national construction projects. We also procure for other goods and services vital for our business, such as information and communications technology (ICT) equipment, safety gear, and other branded attire such as boots, hard hats, safety glasses, gloves, pants, shirts, and hi-vis clothing; site and office consumables including stationery and kitchen goods.

Communication and collaboration with suppliers ensure a transparent and ethical supply chain. We actively engage with our suppliers to gather information about their operations, labour practices, and compliance with modern slavery regulations.

With this information, we conduct risk assessments annually to identify high-risk areas in our supply chain. This includes evaluating geographical locations, industries, and specific suppliers based on expenditure that may pose a higher risk of modern slavery.

Majority of our supply chain is based on materials and operations created and run within Australia, however, throughout our ongoing assessments of our supply chain we have identified products and materials which originate from various countries including China, United Kingdom, USA, Vietnam, Malaysia, Italy, India, France, and Taiwan.

IDENTIFYING THE RISKS

While we have not identified any instances of modern slavery occurring directly within our supply chains, Kane continue to acknowledge that there are several risk factors within the construction industry contributing to modern slavery globally. We continually assess the following construction specific high-risk items in the context of our own supply chain:

- Countries of origin manufacturing products and sourcing material
- Labour hire & transient labour services provided by migrant workers, transient/casual employees, and low skill workers.
- Lack of grievance procedures (smaller businesses with only a few employees may mean limited policies and procedures)

In our pursuit of identifying modern slavery risks, we have proactively engaged with a wide range of suppliers we work with across the nation in the following areas:

- Building Systems
- Construction Services
- Building Trades
- Finishing and Interiors
- Equipment and Machinery
- Exterior and Façade
- Materials and Supplies
- Structural Services
- Waste and Environment



ACTIONS TAKEN FY23-24

Throughout FY 2023-24, Kane have continued to broaden the scope of our processes to assist in detecting and mitigating the risks of modern slavery within our supply chain.

The targets we set over the reporting period and achieved are outlined below.

PRIORITY	ACTION		COMMENTS
POLICY & PROCEDURE DEVELOPMENT	Annual review of Kane's Modern Slavery Policy	✓	Completed
	Review internal processes including Kane's whistle-blower policy, grievance procedure and other reporting mechanisms	✓	Completed
	Review and update Kane's Modern Slavery Guidebook with any legislative updates and recommendations to mitigate risks	✓	Completed
DUE DILIGENCE	Increase the number and the quality of support to subcontractors we work with to educate and gather supply chain information from using data collected from our modern slavery questionnaires.	✓	We have increased the number of subcontractors who have received Modern Slavery information, such as our Guide Book by 29 %
	Track and measure data from questionnaires and PTIs to continue to identify any risk areas	✓	Each project assesses subcontractors including risks of modern slavery during post tender interviews. Further assessment is undertaken annually.
	Issue Modern Slavery Questionnaire to subcontractors	✓	All subcontractors we liaised with for information on modern slavery and reporting requirements were issued a supply chain questionnaire
	Modern Slavery Strategy and Review Meetings	✓	Completed
TRAINING AND EDUCATION	Engagement and collaboration with subcontractors, Kane employees and clients on identifying and responding to modern slavery risks	✓	Completed
	Internal and external training sessions	✓	164 employees undertook training on identifying and responding to modern slavery risks
	Distribute Modern Slavery Guidebook to subcontractors	✓	We actively communicated and educated our subcontractors during our assessment process in this reporting period, which included providing our Modern Slavery Guidebook
	Collaboration and workshops with clients on modern slavery awareness, risk mitigation and reporting mechanisms	✓	Kane have worked closely with clients through workshops, seminars, and meetings on our systems and due diligence on recognising and preventing modern slavery within our supply chain.
	Continued assessment by our Modern Slavery Working Group of the practicality and effectiveness of our modern slavery strategy	✓	Completed

DUE DILIGENCE

We expect our supply chain to work in line with our values and comply with all legislative obligations and we do not tolerate any corrupt, illegal, or improper conduct. We are committed to fostering a culture where everyone feels safe to speak up on matters of concern.

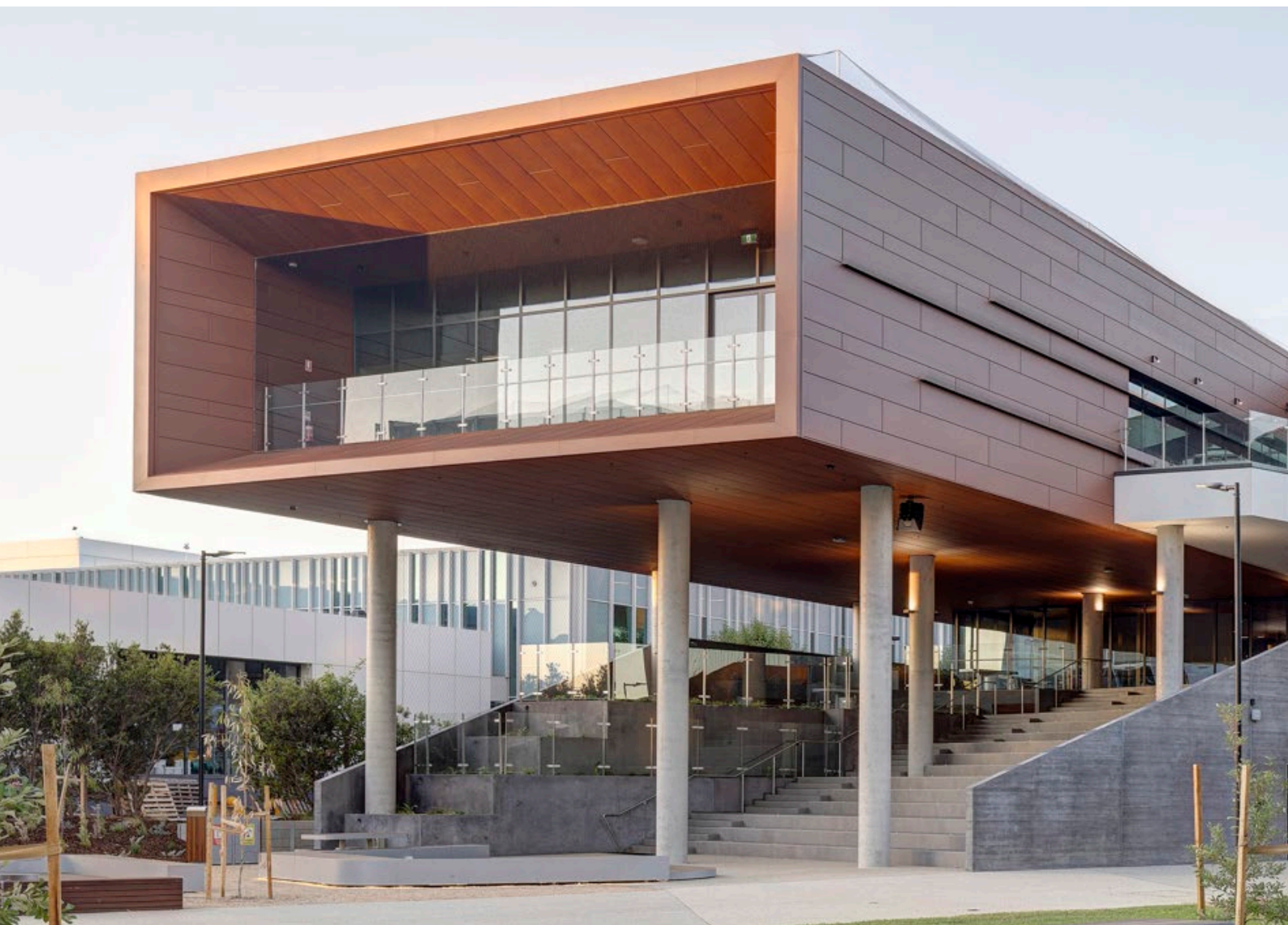
Our tender and evaluation processes for subcontractors and suppliers continue to assist in recognising potential areas for modern slavery risks within our supply chain. This diligence extends to existing suppliers, ensuring ongoing compliance with our Modern Slavery Policy and procedure.

Included in our Post Tender Interview are questions which determine whether the subcontractors have appropriate policies, standards and codes and practices, and whether they understand the risk of modern slavery in their supply chains. These responses are recorded and evaluated before commencing business and are embedded into our contracts.

We have not identified any modern slavery concerns within our supply chain and will continue to work with our suppliers and subcontractors to assess and educate them on the risks of modern slavery.

Our values continue to align with the stance that modern slavery is unacceptable, and our policies, procedures and Code of Conduct promotes behaviour which prevents it. Such values are:

- Doing the right thing
- Treating people with respect, dignity and courtesy
- Holding ourselves and each other accountable
- Professional and collaborative relationships
- Improving social outcomes



TRAINING

Educating our people

We continue to educate and promote awareness on modern slavery risks across the business.

Kane's Modern Slavery training course has been completed by over 100 employees this reporting year. This comprehensive training equips our workforce with the knowledge and skills necessary to identify signs of modern slavery within our supply chain and respond effectively to mitigate associated risks.

Educating our supply chain

Recognising the significance of engaging with our supply chain to assess risks, Kane is committed to collaborating with and supporting our supply chain partners in establishing their own modern slavery policies, procedures, and systems. Our ongoing efforts include conducting information sessions for both internal staff and our subcontractors and suppliers. These sessions aim to enhance collective awareness and understanding of potential areas of exposure or key risks in our operations.

Promoting awareness

Kane have designated trained employees across the business who can educate, respond to problems, and tackle worker issues or concerns. They are encouraged to raise awareness and are empowered to drive continual improvement against modern slavery risks.



RELEVANT POLICIES AND OTHER DOCUMENTS

MODERN SLAVERY POLICY AND PROCEDURE

Kane's Modern Slavery Policy aims to minimise the risks of modern slavery within our business and within our supply chains. Kane has a coinciding Modern Slavery Procedure to provide further information on what to do if a risk or perceived risk was ever identified.

Kane's Modern Slavery procedure addresses:

- Our commitment of conducting due diligence to ongoing assessments of our supply chain for identifying vulnerable areas;
- Modern slavery training, how to access it, and who should be involved; and
- Key personnel to contact if modern slavery risks are identified within our supply chain.

WHISTLEBLOWER POLICY

Kane's Whistleblower Policy is available both internally and to third parties to ensure that any disclosure made about suspected misconduct or an improper state of affairs or circumstances within Kane (or its supply chain) are handled in an objective, secure and confidential manner. Kane's Whistleblower Protections Officers are aware and have access to Kane's Modern Slavery Procedure and how/where to escalate any modern slavery matters.

We continue to review and update our policies and procedures in accordance with legislative requirements and updates.

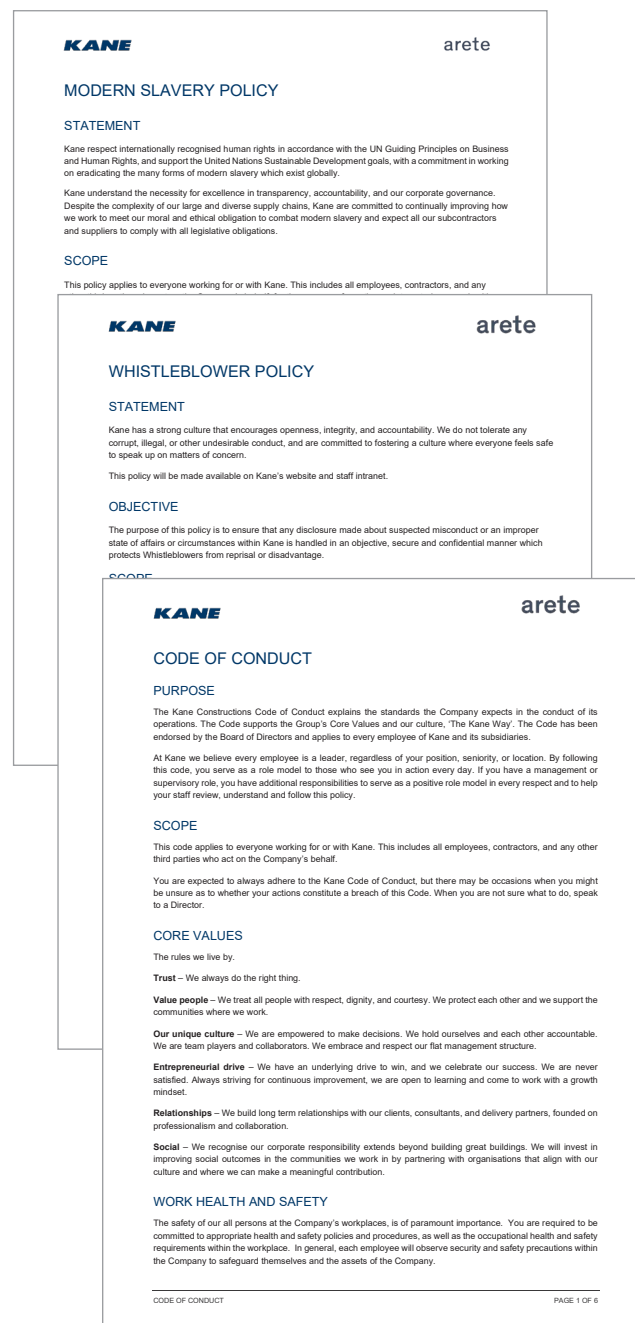
CODE OF CONDUCT

The Kane Constructions Code of Conduct explains the standards the Company expects in the conduct of its operations. The Code supports the Group's Core Values and our culture, 'The Kane Way'. The Code has been endorsed by the Board of Directors and applies to every employee of Kane and its subsidiaries.

MODERN SLAVERY PREVENTION GUIDEBOOK

During the 2019-20 reporting period, Kane established a Modern Slavery Toolkit and Guidelines for our suppliers and partners. The Guidebook provides information on the importance of addressing modern slavery risks, our obligations in accordance with the Modern Slavery Act 2018 (Cth), our action plan and information on how Kane can support our subcontractors.

We have further developed our Guidebook in this reporting period to provide more information on identifying, preventing and responding to modern slavery risks.



LOOKING FORWARD

We are committed to continuous improvement and regularly review and update our supply chain mapping and anti-slavery measures.

Feedback from stakeholders, including employees and external partners is valued and contributes to refining our approach for years to come.

Over this next reporting period, we aim to continue to improve:

PRIORITY	ACTION
POLICY & PROCEDURE DEVELOPMENT	Annual review of Kane's Modern Slavery Policy
DUE DILIGENCE	Maintain the quality of support to subcontractors we work with to educate and gather supply chain information from using data collected from our modern slavery questionnaires.
	Track and measure data from questionnaires and PTIs to continue to identify any risk areas
	Issue Modern Slavery Questionnaire to subcontractors
	Modern Slavery Strategy and Review Meetings
TRAINING AND EDUCATION	Engagement and collaboration with subcontractors, Kane employees and clients on identifying and responding to modern slavery risks
	Internal and external training sessions
	Distribute Modern Slavery Guidebook to subcontractors
	Collaboration and workshops with clients on modern slavery awareness, risk mitigation and reporting mechanisms

APPROVAL

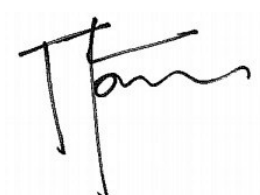
The actions taken to assess and address risks across “Kane” cover both Kane Constructions Pty Ltd (ABN 49 007 354 396) and Kane Constructions (QLD) Pty Ltd (ABN 84 625 633).

Kane Constructions (QLD) Pty Ltd is a wholly owned subsidiary of Kane, run by the same board, using the same systems, policies, and procedures.

In accordance with section 13 of the Modern Slavery Act (Cth) 2018, this statement has been approved by the board of Kane Constructions.



Richard Frisina



Tristan Forster

JOINT MANAGING DIRECTORS