



RJ Vincent (RJV)

# Modern Slavery Statement 2022



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## 1. Introduction

This statement is made under the Australian Modern Slavery Act 2018 (Cth) for the financial year ending 30<sup>th</sup> June 2022 (FY22), on behalf of Ralmana Pty Ltd trading as R.J. Vincent & Co. (RJV) (ABN 93009149106) and its subsidiary RJV Contracting Pty Ltd (ABN 92 637 541 470). We consulted the relevant companies that we own or control in the development of this statement.

This statement is RJV's second Modern Slavery statement and details the steps taken to assess the risks of Modern Slavery within its operations and supply chain, and actions being taken to manage these risks.

## 2. Our Company

RJV are committed to operating the business lawfully and ethically, ensuring that all aspects of our business practices, including our supply chains and contracting networks, are free from any form of slavery. We reject any and all forms of modern slavery which can take the form of unpaid or underpaid servitude, human trafficking and forced labour. We are dedicated to implementing effective systems and controls to ensure that it does not take place within our own business and we expect our suppliers and contractors to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking and child labour.

In FY22, we continued our analysis of the risk of Modern Slavery within RJV operations and supply chain. While our analysis, shows that the risk is relatively low, we are continually implementing initiatives to minimise the risk of Modern Slavery within our business operations.

This statement reflects our commitment to respecting Human Rights and highlights key actions we are taking to address risks in our own operations, and our supply chain, including risks associated with modern slavery. We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection, staff inclusion and diversity. The statement supports the Australian government's work on modern slavery.

## 2.1. Business Overview

RJV is a privately owned Western Australian company, based at 4-5 Kirke St Balcatta WA 6021. Founded in 1955 to initially provide bulldozing services in country areas of Western Australia the company has since evolved to become one of Western Australia's leading and most respected Civil Engineering and Mining Services contractors.

Our Mining Services division is one of Western Australia's primary Open Pit Mining contractors, with multiple years of experience and knowledge servicing the Western Australian resources sector. RJV has become a partner of choice through our diversified capability in the resources sector including gold, iron ore and mineral sands. With a highly experienced and stable leadership group we bring a knowledge base and stability rarely seen in mining.

Our Civil Infrastructure division has set its foundation on being one of the Western Australia's leading Civil Infrastructure contracting companies in both the resources sector and the local domestic market. Our experience and knowledge base is unrivalled with continuing repeat clients looking to us to deliver the highest quality of work safely, on-time and to specifications. Our team from management through to operator, is vastly experienced and dedicated to safety and best practices in the field, utilising our extensive fully owned fleet of plant and equipment.

RJV's People & Culture and Risk & Compliance teams have various policies in place that support our day-to-day operations and corporate governance to ensure all employees and suppliers meet our core values. Our scope of services cover:

- Load and Haul Operations
- Bulk Earthworks & Rehabilitation
- Urban Development
- Tunnels & Bridges
- Underground Services
- Road Construction
- Culvert Installation
- Drill and Blast
- Project & Statutory Management
- Tailings Storage Facility Construction
- Hard Rock Quarry Operations
- Haul Road Construction & Maintenance
- ROM & Waste Dump Management
- Topsoil Removal & Management
- Concrete Installation and Removal
- Crusher Feed

## 2.2. Workforce

At the end of FY22 RJV had a workforce totalling approximately 210 people, employed on a full time equivalency basis. This included 170 employed directly and approximately 40 employed through a number of local specialised labour hire companies.

RJV has policies and procedures in place to ensure that all direct employees are screened, on-boarded and employed in a manner that mitigates the risk of Modern Slavery.

Under our terms and conditions, all labour hire suppliers are required to comply with RJV policies and code of conduct.

The business strives to ensure that all employees and contractors are aware of their rights and responsibilities by providing information, policies and a grievance mechanism for individuals to raise concerns and a process to resolve any issues raised.

## 3. Supply Chain

During FY22 RJV continued working to analyse and review the risk of Modern Slavery occurring within the supply chain. The risk continues to be minimised by the fact that all business services are conducted solely within Western Australia.

Machinery used in civil construction are sourced from Tier 1 suppliers, that have offices based in Australia and have advanced policies and procedures in place, along with quality systems. Parts are purchased to service and maintain this equipment and these parts are all sourced from local suppliers, as are uniforms and other business consumables.

Service providers including Labour hire who source labour and services locally, predominantly work under RJV's Accredited Safety, Quality and Environment systems.

The RJV contractor prequalification system requires all subcontractors and suppliers engaged to complete the online prequalification process prior to providing any goods or services for, or on behalf of RJV.

This process identifies and acknowledges the requirement for suppliers to submit a Modern Slavery statement, and a request for details identifying how companies monitor risks associated with Modern Slavery.

Our contractor and supplier terms and conditions have been developed to ensure that suppliers and contractors are made aware of their modern slavery obligations and that they have sufficient systems in place to meet our requirements.

## 4. Policies and Procedures

The RJV Foundations are a set of values based statements that reside at the very core of our culture. Our Foundations define who we are, how we work, and what we stand for as a business.



RJV does not tolerate any form of slavery, human trafficking, forced or child labour. We have formal policies in place that are intended to promote the foundations of the business along with ethical and legally compliant business conduct. Our policies contribute to our commitment to prevent violations of human rights in our business, they include our Code of Conduct, Whistleblower Policy and Corporate Social Responsibility Policy.

Our policies set out conduct expectations and apply to all employees, contractors and consultants and others engaged to perform work for RJV. These policies are reviewed and updated on a regular basis to ensure that they remain current and compliant.

### 4.1. Whistleblower Policy

RJV values the people who work within the business and encourages a culture of openness, where employees can raise concerns about any business conduct or practices. The Whistleblower Policy establishes a mechanism, so that staff and contractors can freely and anonymously (if desired) report conduct that goes against the ethics and values of the business. This includes raising any concerns of Modern Slavery within the RJV supply chain.

During FY22, RJV updated the Whistleblower procedure and engaged WBS to provide Whistleblower services. Senior management have all completed Whistleblower training.

## 5. Potential Risks

During this assessment period, we have continued to assess risks that may possibly cause, contribute or be directly linked to modern slavery practices. The results from these assessments have identified areas within the supply chain that have different risk profiles. Areas with lower risk include operational activities that are directly undertaken by RJV employees and contractors who are covered by our internal processes. Higher risk areas have been identified where local suppliers source products and parts from overseas sources.

This risk is minimised when sourcing equipment through local reputable suppliers with audited quality systems in place, rather than buying directly from overseas. This also increases our ability to meet with suppliers, agree terms and conditions, develop ongoing relationships and audit supplier processes.

## 6. Actions

### 6.1. Actions Taken in FY22

The actions taken in FY22 to gain greater understanding of the RJV supply chain and to combat any risk of Modern Slavery include:

#### 1. Due Diligence

- Continued assessment of the RJV supply chain to identify potential risks of Modern Slavery.
- The RJV Risk Register has been reviewed for supplier risks of Modern Slavery.
- RJV supplier terms and conditions have been updated to include Modern Slavery assessment.
- Our major suppliers have all completed pre-qualifications in the new RJV compliance system to include a questionnaire on Modern Slavery risks.
- Quality procedures have been audited against Modern Slavery requirements.
- Our CEO travelled overseas to visit supplier manufacturing sites and review supply chains.

## 2. Company policies

- Policies have been reviewed in accordance with our procedure and incorporate Modern Slavery risks where appropriate.
- The whistleblower process has been updated and online reporting has been implemented.

## 3. Training

- Modern Slavery training has been completed by the Senior Management Team.
- The corporate onboarding and induction process has been updated, to include awareness of the risks of Modern Slavery. All employees have been re-inducted.

### 6.2. Commitment

RJV continues to update and implement processes and practices in the business to minimise the risks of modern slavery within the supply chain.

Over the next reporting period RJV are committed to enhancing the measures already taken and continue developing greater understanding of the supply chain and partner processes.

## 7. Measure of Effectiveness

The actions taken to train senior employees along with reviewing policies, updating the Whistleblower procedure and improving the supplier pre-qualification process appear to have been effective in increasing awareness and reducing risk of Modern Slavery within the business. We will continue to monitor compliance of the actions put in place and commitments made through our quality systems and annual review of policies.

This Statement has been prepared to meet the seven mandatory criteria set out in the Commonwealth Modern Slavery Act 2018 and was approved by the RJV Board of Directors on 20<sup>th</sup> December 2022.



Tim Ryan  
Chief Executive Officer  
11<sup>th</sup> January 2023