



MONFORD

MONFORD SLAVERY STATEMENT

UNDER THE MODERN SLAVERY ACT 2018 (CTH)
REPORTING PERIOD: 1 JULY 2023 – 30 JUNE 2024



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INTRODUCTION

This is Monford Group Pty Ltd.'s (Monford) first statement pursuant to the Modern Slavery Act 2018, following Monford's review of its supply chains and operation, in compliance with reporting obligations under the Act for the financial year ending 30th June 2024.

As part of this Statement, Monford will address the following criteria in accordance with the Modern Slavery Act 2018 (Cth) as follows:

1. Identify the reporting entity
2. Describe the structure, operations and supply chains
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity.
4. Describe the actions taken by the reporting entity to assess and address these risks, including due diligence and remediation processes.
5. Describe how the reporting entity assess the effectiveness of these actions.
6. Describe the process of consultation with any entities the reporting entity owns or controls.
7. Any other relevant information.

A MESSAGE FROM OUR CEO

“At Monford, we believe that addressing modern slavery in Australia is crucial for ensuring ethical practices and protecting vulnerable populations. We are committed to actively implementing comprehensive policies and fostering collaboration among stakeholders to reduce the risk of exploitation, promote human rights, and support the construction industry's efforts toward a more ethical future.”

As a leading engineering and construction contractor, we understand that our influence spans across our operations and supply chains. We are committed to upholding the highest standards of human rights, transparency, and ethical conduct throughout everything we do.

Modern slavery is a serious issue that can affect various industries, including construction. It is vital that we play an active role in preventing exploitation and promoting human rights in all our operations. This is a collective responsibility across the industry—contractors, suppliers, clients, and communities—and we are dedicated to ensuring that Monford is part of the solution.

We have implemented comprehensive policies to identify and address the risks of modern slavery within our supply chains and projects. These strategies are not just theoretical; they are embedded into our day-to-day operations and are actively monitored and refined by our management team. As CEO, I am personally committed to driving this agenda and ensuring that Monford maintains the highest standards of integrity and respect for human rights at every level of our organisation.

Collaboration is essential in tackling modern slavery. We work closely with our clients, suppliers, and subcontractors to ensure that we all share a common understanding of the importance of ethical practices. By fostering open communication and collaboration, we strengthen our collective efforts to reduce exploitation risks throughout the life cycle of our projects.

At Monford, we also focus on the social impact of our work, ensuring that our projects contribute positively to the communities where we operate. Our commitment to eliminating modern slavery is integral to our corporate culture, and we continuously improve our policies, training, and supply chain management to address this issue.

We also prioritise educating our employees and suppliers about modern slavery risks and encourage them to report any concerns. By equipping our teams with the tools and knowledge to identify and address these issues, we ensure that Monford remains an industry leader in promoting ethical business practices.

We will continue to work to eliminate modern slavery and ensure that all individuals involved in our projects are treated with respect and dignity.



Ciaran Shannon
Chief Executive Officer
15 December 2024

1 REPORTING ENTITY

This is Monford Group Pty Ltd.'s (Monford) first statement as a single reporting entity pursuant to the Modern Slavery Act 2018, following Monford's review of its supply chains and operations in compliance with reporting obligations under the Act for the financial year ending 30th June 2024.

2 STRUCTURE, OPERATIONS AND SUPPLY CHAIN

2.1 STRUCTURE

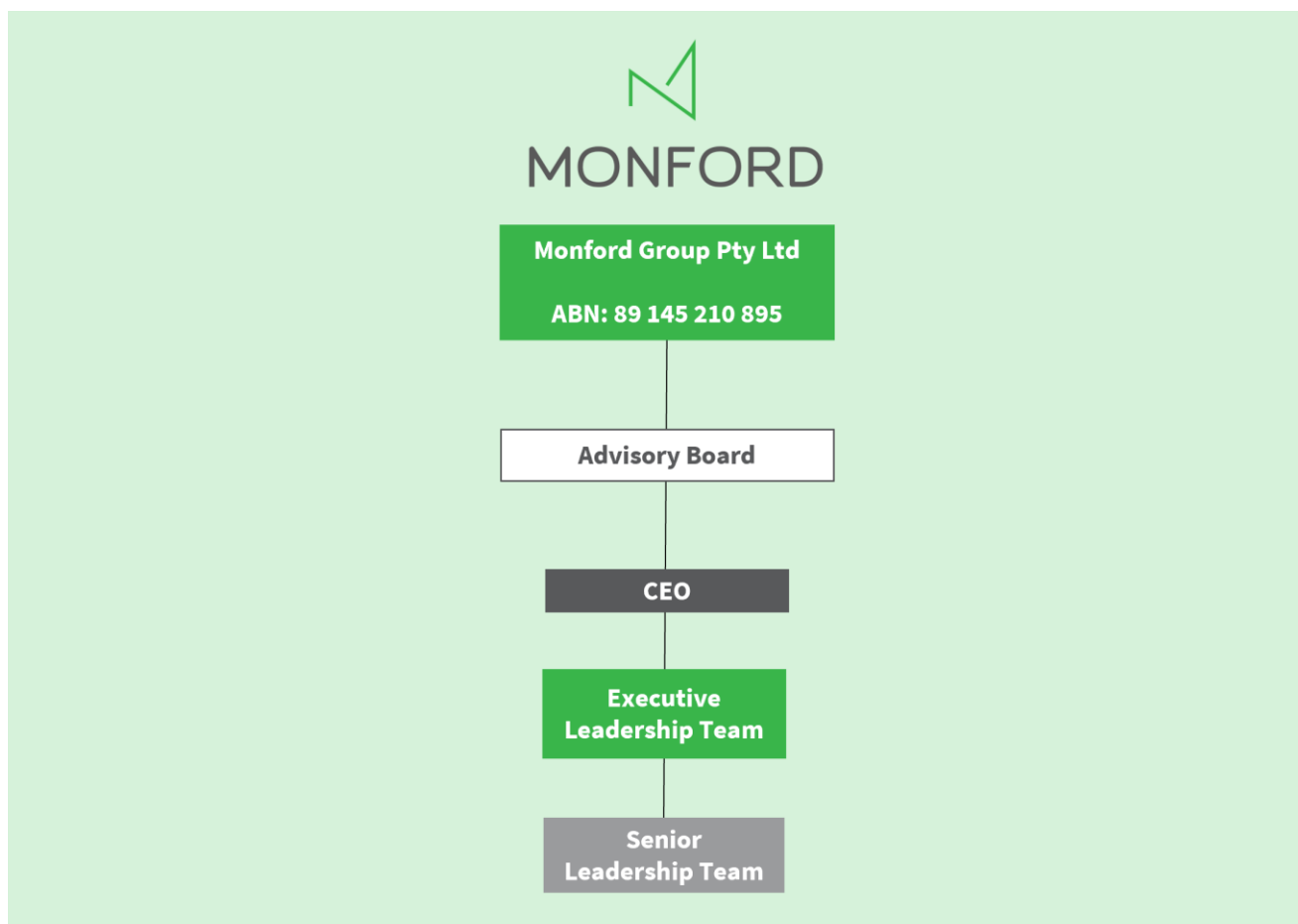
Monford Group Pty Ltd (ABN 89 145 210 895) is a company limited by shares, incorporated and domiciled in Australia. The registered office and principal place of business is Monford House, Level 7, 239 Adelaide Terrace, Perth, Western Australia 6000.

Monford Group is the only reporting entity.

The term "**Monford**" refers to Monford Group Pty Ltd.

This is the first Modern Slavery Report issued by Monford.

During this reporting period, FY24, Monford has not undertaken any significant corporate changes.



2.2 OPERATIONS

Monford is an Australian owned and operated, integrated, self-performing, multidisciplinary engineering and construction company, able to mobilise experienced teams to site with minimal lead times. Monford offers a full range of services, including construction only, Design and Construct, EPC and O&M.

Monford carries projects from initiation through to operation. Our capabilities, specialising in Engineering, Procurement and Construction (EPC) offer comprehensive services encompassing the entire project lifecycle, from early development phases to ongoing operation and maintenance.

We excel at every stage, from identifying and screening potential sites to construction, commissioning and long-term operation and maintenance. Our capabilities extend to preparing initial concept designs tailored to each site, consulting with key stakeholders within local communities, government agencies and other interested parties. We manage development studies, planning applications and approvals with precision, ensuring seamless project progression.

Monford has established itself as the contractor of choice within the growing renewable energy market and has demonstrated the ability to deliver renewable projects on schedule, and within budget. With a dedicated team committed to sustainability, we prioritise providing robust solutions for our client's projects. Leveraging our natural ingenuity and technical proficiency, we not only meet but exceed expectations, fostering a prosperous and sustainable future for our clients and the environment.

2.3 MONFORD VISION AND VALUES

Monford Group delivers sustainable solutions with a focus on equality, ecology, and economy. The company strives for excellence through continuous improvement, guided by RIPPA values: resilience, innovation, positivity, performance, and approachable, contributing to our One Monford culture.



RESILIENCE

We recognise, through unwavering focus, continuous learning and personal growth we can always discover a path forward – a journey we take together.



INNOVATION

We continually examine the 'why,' seeking enhanced efficiency by consistently embracing technology advancements and refining our processes.



POSITIVITY

With our 'can-do' and 'solution-focused' mindset, we embrace a growth-oriented perspective and celebrate both team and individual achievements.



PERFORMANCE

By upholding our commitment to efficient delivery, proactively addressing challenges and lessons learnt, we enhance our reputation and profitability.



APPROACHABLE

We demonstrate respect towards one another, our stakeholders, and our clients, fostering open communication and a collaborative approach while embracing a unified 'One Monford' culture.

One Monford Culture

The 'One Monford Culture' ensures our RIPPA values are upheld consistently, regardless of location. From offices to projects across Australia we maintain respect for each other and our communities, fostering positivity, approachability, and excellence in our work. Our commitment to the RIPPA values unifies us as a cohesive team, the One Monford team.

3 RISKS OF MODERN SLAVERY IN MONFORD'S OPERATIONS AND SUPPLY CHAIN

3.1 WHAT IS MODERN SLAVERY AND HOW DOES IT AFFECT MONFORD'S OPERATIONS?

The act defines “Modern Slavery” with reference to the commonwealth Criminal Code and international law. It captures:

- Conduct that would constitute slavery and slavery like offences, whether or not the conduct took place in Australia.
- Human Trafficking, and the worst forms of child labour.
- Slavery and slavery like conduct would include forced labour, deceptive recruitment and debt bondage.

Modern slavery can possess risks within construction and renewable energy, operations and supply chains, including:

- **Labour Exploitation:** Workers may face unfair wages, excessive hours, or poor working conditions, especially migrant workers who are vulnerable to exploitation.
- **Human Trafficking:** Some workers can be trafficked into the sector, often through deceptive recruitment practices or coercive contracts.
- **Child Labour:** In some regions, child labour may be used in supply chains, particularly in overseas material sourcing.
- **Lack of Transparency:** Complex supply chains make it challenging to trace the origins of materials and labour practices, increasing the risks of hidden exploitation.
- **Regulatory Compliance:** Companies may struggle to comply with local and international regulations aimed at preventing modern slavery, exposing them to legal and reputational risks.
- **Supplier Risks:** Subcontractors may not adhere to ethical labour practices, leading to indirect complicity in modern slavery.
- **Economic Pressures:** Cost-cutting measures can incentivise unethical practices, pushing some companies to prioritise profit over ethical labour standards.
- **Geographical Risks:** Operating in regions with weaker labour laws or enforcement can increase vulnerability to modern slavery.

3.2 SUPPLY CHAIN

Monford engages in the execution of full EPC activities within the Australian market through the:

- Employment and management of Australian personnel.
- Engagement of Australian Subcontractors.
- Procurement of materials, plant and equipment from domestic and global suppliers.

Monford's supply chain is an important part of the Monford business. We work closely with our supply chain to ensure that they comply with all applicable legislative and regulatory requirements.

Monford's supply chain consists mainly of Australian entities. Monford sources locally in Australia when it's possible and practical to do so.

During this reporting period, Monford's direct contracting with overseas entities represents a small proportion of the suppliers and dollars that Monford uses and spends.

Several of Monford's Australian suppliers do themselves source components of their goods from overseas entities at some point in their supply chain. The typical projects that Monford undertakes are generally large and complex, this leads to large and varied supply chains sourcing a wide range of products or services.

3.3 SUPPLY CHAIN RISKS

Monford acknowledges that our engagement of subcontractors in Australia, and some suppliers within Australia or globally may contribute or be directly linked to Modern Slavery practices.

Monford has evaluated and addressed the risks of modern slavery within its supply chain. Monford generally undertakes technical and complex projects that often require specialised equipment and materials. These materials may need to be sourced from suppliers who, in turn, obtain individual components or raw materials from vendors located in regions where modern slavery practices have been reported and labour standards may not meet ethical standards.

More broadly, the risks could impact Monford Group's, compliance and operational scrutiny.

KEY AREAS OF CONCERN INCLUDE:

Area of Concern	Risk Factors	Potential Risks
Outsourced Labour – engineering and administrative services. Monford outsources some administrative and engineering services overseas.	<ul style="list-style-type: none"> Low skilled Labour. Migrant Workers Lower Tier Supply Chain 	<ul style="list-style-type: none"> Forced Labour Debt Bondage Deceptive Recruitment
Manufactured Technical Components – including Generators, electrical equipment, switchboard and IT equipment.	Manufacturers of these products are generally overseas and could use low skilled labour and migrant workers	Unable to track core materials back to source.
Manufactured Steel Products	Manufacturers of these products are generally overseas and could use low skilled labour and migrant workers	Unable to track core materials back to source.
Plant & Equipment – including earthworks machinery, heavy vehicles, light vehicles, generators, portable buildings and tools	Manufacturers of these products are generally overseas and could use low skilled labour and migrant workers	Unable to track core materials back to source.
Lack of transparency in Supply Chain	Complexed multiple tiered suppliers	Unable to track labour practises back to source
Violations within Manufacturer of components	Labour laws not enforced strongly enough	Poor workers protections Workers exposed to unsafe working conditions

3.4 OPERATIONAL RISKS

Monford has assessed and considered modern slavery risks in its operations. The following risk factors were identified:

Type of Labour & Workforce

The construction industry generally, is inherently at risk of working with potentially vulnerable labour and workforces. This is because of the inherent nature and ups and downs of resourcing needs in project based and remote work. This can involve multiple trades and labour types working simultaneously and temporarily on projects. Project based work is often won based on price through competitive market tenders. This can translate to pressure to utilise lower paid, lower skilled workforce, which is transient by nature, which possess a risk to Monford by way of many personnel mobilised for a relatively short period of time. This can make personnel difficult to monitor across projects and different subcontractors.

Inherent High-Risk Nature of Construction Operations

Generally, construction industry projects require a large and wide range of continuously interacting subcontractors. This includes categories which can be inherently high risk – such as labour hire personnel and cleaning subcontractors. Competitive tendering process contracts may be awarded based on the lower price, which may ultimately lead to lower rates of pay and poorer conditions of pay for the employees of these subcontractors.

Monford uses supplier assessment and procurement processes to identify and mitigate these practices by undertaking a broader assessment and decision process which considers the categories including health and safety, sustainability measures, industrial relations policies and a Modern Slavery Questionnaire.

4 ACTIONS TAKEN BY MONFORD TO ASSESS AND ADDRESS THE RISKS INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

Addressing the risks of modern slavery within the supply chain requires an ongoing multi-faceted approach.

4.1 CURRENT STRATEGIES, POLICIES AND ACTIONS

4.1.1 SUPPLY CHAIN TRANSPARENCY

- **Mapping the supply chain:** Monford conducts thorough mapping of the supply chain to identify all suppliers and sub-contractors.
- **Due diligence:** Monford uses due diligence processes to assess the risk of modern slavery within all tiers of the supply chain. Monford has a dedicated supplier software program where Monford carries out and documents its supplier due diligence. All suppliers are vetted through this process. Monford engages overseas partners where appropriate in identified high risk areas to visit factories of overseas suppliers to assess working conditions overseas to ensure compliance with local legislation.

4.1.2 WORKER EMPOWERMENT

- **Education and Rights Awareness:** Monford provides information to workers about their rights and available support services, ensuring they know how to seek help if needed.
- **Fair Recruitment Practices:** Monford ensures that recruitment processes for workers in the construction sector are transparent and fair, proactively avoiding practices that may lead to exploitation.

4.1.3 RISK ASSESSMENT AND MITIGATION

- **Risk assessments:** Monford periodically assess the risk of modern slavery in various regions and sectors involved in the supply chain, adjusting strategies and mitigations, as needed.

4.1.4 CORPORATE GOVERNANCE

Monford operates under an Australian stock exchange style corporate governance system set by the board of directors, the company Secretary and the executive leadership team. The existing policies relevant to identifying and preventing modern slavery risks and practices within Monford are:

- Modern Slavery Policy
- Recruitment Policy
- Code of Conduct Policy which applies to all Monford employees, subcontractors, suppliers service providers and consultants. The policy specifically discusses Modern Slavery.

4.2 FUTURE STRATEGIES, POLICIES AND ACTIONS

To strengthen Monford Group's efforts against modern slavery within the supply chain of construction in Australia, Monford will consider the following future actions:

4.2.1 POLICIES UPDATE

- **Workplace Discrimination Policy:** Monford will implement a Workplace Discrimination Policy which will specify that Monford expressly does not employ forced, bonded or child labour

- **Recruitment Policy:** Monford will update the Recruitment Policy to formally include modern slavery considerations
- **Sustainability Policy:** Establish a Sustainability Policy
- **Code of Conduct:** Develop a supplier code of conduct that explicitly prohibits modern slavery and sets out expectations for ethical labour practices.
- **Whistleblower Policy:** Establish a whistleblower policy with confidential reporting mechanisms for workers and other stakeholders to report suspected cases of modern slavery without fear of retaliation

4.2.2 KEY PERFORMANCE INDICATORS

- **Establish KPIs:** Define specific, measurable KPIs related to modern slavery, such as the number of audits conducted, percentage of supplier complaints with the code of conduct, and training sessions completed.
- **Monitor Trends:** Regularly track these KPI's over time to identify trends and areas for improvement.
- **Board Reporting:** Establish regular management reports to the board of directors on efforts to combat modern slavery, including the outcomes of audits and the effectiveness of policies.

4.2.3 STAKEHOLDER COLLABORATION

- **Community Involvement:** Engage with local communities to understand labour conditions and support local initiatives aimed at preventing exploitation.

4.2.4 MONITORING AND AUDITING

- **Audits:** Establish a schedule and conduct audits of suppliers to ensure compliance with ethical standards. This can include both announced and unannounced visits.

4.2.5 TRAINING

- **Training and Awareness:** Provide training for employees engaging with suppliers about modern slavery risks and how to identify, prevent and mitigate them.

4.2.6 STRENGTHENING SUPPLIER RELATIONSHIPS

- **Long-Term Partnerships:** Foster long term relationships with ethical suppliers, promoting fair practices and responsible sourcing.

5 MEASURE EFFECTIVENESS OF ACTIONS

Assessing the effectiveness of actions taken to mitigate modern slavery in the construction industry involves a systematic approach.

Below are some strategies that Monford will use to evaluate its efforts:

5.1 SUPPLIER AUDITS AND ASSESSMENTS

- **Regular Audits:** Conduct regular internal and external audits of suppliers to assess compliance with modern slavery policies
- **Follow Up Actions:** Evaluate the effectiveness of follow up actions taken in response to audit findings such as correction action plans and their implementation.

5.2 SURVEYS & FEEDBACK MECHANISMS

- **Supplier Surveys:** Implement surveys for suppliers to gather feedback on their understanding of modern slavery risks and the effectiveness of training provided.
- **Worker Feedback:** Create channels for workers to provide feedback about their experiences and perceptions of labour practices within the supply chain.

5.3 INCIDENT TRACKING

- **Document Incidents:** Keep a record of any reported incidents of modern slavery or labour exploitation, including how they were addressed and resolved.
- **Analysis of Root Causes:** Analyse the root cause of incidents to identify systemic issues and areas for further action.

5.4 STAKEHOLDER ENGAGEMENT

- **Participate in Industry Initiatives:** Engage in collective efforts within the construction industry to share experiences and benchmark against peers
- **Engagement with Stakeholders:** Involve stakeholders in discussions about Monford's strategies and findings, fostering transparency and accountability

5.5 IMPACT ASSESSMENTS

- **Conduct Impact Assessments:** Assess the impact of any specific interventions, such as training programs or supplier engagement initiatives, reducing modern slavery risks.

5.6 CONTINUOUS IMPROVEMENT

- **Review and Revise Policies:** Regularly review and update policies and practices based on findings from assessments, audits and stakeholder feedback
- **Learning and Adaption:** Foster a culture of learning within Monford's organisation, encouraging staff to share insights and adapt strategies as new challenges arise.

6 CONSULTATION PROCESS

Monford Group Pty Ltd is a single reporting entity and in accordance with the requirements of the Act, so mandatory reporting criteria 6 (Consulting Process) is not applicable to Monford.

Monford's Executive Leadership Team have ensured that all staff understand the importance and implications of this Act on the Monford business and the construction industry more generally.

Monford with the support of the board of directors and executives is committed to the continuous development and improvement of policies and processes relating to modern slavery.

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This statement for the Financial Year ended 30th June 2024 was approved by the Monford Group Pty Ltd Board of Directors.