

**Our Solutions.
Your Success.**



MODERN SLAVERY STATEMENT

Financial Year 2023-2024

1. Reporting Entity

The Modern Slavery Statement by LUCAS TOTAL CONTRACT SOLUTIONS (HOLDINGS) PTY LTD (ABN 66 137 901 752) of registered address 'LUCAS PROPERTY', LOT 101 BROOKSIDE ROAD, FLAGSTAFF HILL SA 5159 and its controlled entities (Lucas) is prepared as required by the *Modern Slavery Act 2018 (Cth)* for the financial year ended 30 June 2024.

2. Our Commitment

Lucas has a zero-tolerance approach to modern slavery and is committed to addressing any modern slavery risks in its operations and supply chains. We have undertaken an initial risk assessment of modern slavery in our operations and supply chains. This statement outlines our progress to date and our current and future commitments.

3. Our Operation, Structure and Supply Chains

Lucas is a privately owned company founded in South Australia in 1969 by the Lucas Family and currently has 7 wholly owned subsidiary entities¹. Since that time the company has experienced significant growth in business, capacity and capability expanding its core services of mining, energy and civil contracting to include civil maintenance, concrete construction, heavy haulage, bulk material supply and haulage, plant hire, bulk earthworks, logistics, remediate, marine infrastructure and development, mobile camp, survey and plant maintenance.

During the reporting period we undertook many significant projects for some of Australia's leading government, private and public organisations in mining, energy and civil construction and employed an average of 540 employees.

The company performs projects solely in Australia and predominantly, Lucas contracts and partners with Australian-domiciled companies in our supply chain as set out below:

Project Supply and construction materials and services	Lucas acquires project products and materials and services such as fuel, concrete, quarry products, steel, plant and equipment hire services and various construction subcontract services.
Heavy equipment parts and repair services	Lucas acquires heavy machinery parts, accessories and consumables and provision of plant and machinery maintenance and servicing.
Labour Hire	Lucas utilises through third party labour hire service providers.
Logistics	Lucas engages third party cartage contractors for movement of machinery and project materials.

¹ Lucas Total Contract Solutions (NLCSG) Pty Ltd (ABN 57 160 650 993), Lucas Total Contract Solutions Pty Ltd (ABN 79 137 901 805), Lucas Total Contract Solutions (Services) Pty Ltd (ABN 82 131 802 054), Lucas Total Contract Solutions (TSM) Pty Ltd (ABN 30 164 314 443), Lucas Total Contract Solutions (Mining Services) Pty Ltd (ABN 51 137 901 690); Lucas Total Contract Solutions (USG) Pty Ltd (ABN 50 623 376 438), Lucas Total Contract Solutions (Mindarie 2) Pty Ltd (ABN 99 667 678 453),

Professional Services	Lucas retains professional consultants, such as designers and engineers, for project delivery. It also engages various consultants to provide environmental, insurance, legal, financial, information technology and other professional services.
Cleaning and Maintenance	Lucas engages third parties for the provision of cleaning and maintenance services including site maintenance, office cleaning and accommodation cleaning services.
Uniform, PPE and Office Supplies	Lucas acquires corporate uniforms, personal protective equipment, office supplies and consumables from third parties.
Utilities	Lucas retains various service providers across its business to provide utilities including electricity, gas, water and telecommunications.
Accommodation services and food and beverage providers	Lucas sources accommodation and meals for our remote project workforces.

In Financial Year 2023/2024, we had approximately 581 active vendors and suppliers and spent \$89M with direct suppliers. Since its establishment, our core values have been the foundation of the business, reflecting who we are, what we stand for and the legacies we leave. Because of this, we have established long-term relationships with many of our suppliers, the majority of which are in Australia.

Utilising Lucas' Risk Management Program, which is a structured and proactive program to facilitate the early identification of hazards, assessment of risk and implementation of control measure to enable a safe working environment for all our employees and contractors, we undertook an initial risk assessment of modern slavery in our operations and supply chains. We will continue to monitor the effectiveness of actions being taken to assess and address modern slavery risks.

4. Risks of Modern Slavery practices in Operations and Supply Chains

4.1 Workforce

4.1.1 Directly Employed Workforce

In Financial year 2023-2024, our directly employed workforce consists of 99% Australia Citizens or Australian Residents. The remaining 1% comprises employees we hire from other countries under appropriate working visas or sponsorships.

All employees are hired and paid in line with the existing Employee Bargaining Agreement, applicable awards, or a written employment contract that meets or surpasses the specified standards.

Our employees are educated on modern slavery in our inductions at commencement of employment and periodically.

The Global Slavery Index categorises Australia as low risk for modern slavery. Given the low risk profile, and the policies and processes adopted by Lucas, Lucas considers that it is unlikely to have a risk of modern slavery practices in its permanent workforce.

4.1.2 Labour Hire Workforce

Labour hire workforce is only a small percentage of our overall workforce profile.

We collaborate with established and reputable labour hire agencies, ensuring that their Terms of Business are thoroughly reviewed and approved before entering into any agreements.

Our labour hire workforce is educated on modern slavery in our inductions at commencement of employment and required to comply with all Lucas policies and procedures.

4.2 Supply Chain

We procure necessary consumable items for our business operations. Among the top 14 products that are at high risk for modern slavery, as identified by the Global Slavery Index 2023, there are four products groups that our company frequently purchases for our supply chain. These products include clothing and textiles for uniforms and personal protective equipment (PPE), electronic devices like laptops, tablets, and mobile phones, as well as staff supplies such as coffee and sugar. To ensure ethical sourcing, we have evaluated our primary suppliers for these high-risk categories and scrutinized their modern slavery statements and certifications.

Potential areas identified by us where there may be some risk for modern slavery are:

- suppliers who may use products purchased or manufactured in high-risk countries; and
- products (such as cement and steel) purchased which are made in high-risk countries.

Although we have identified there are potential areas of risk for modern slavery in our business, we consider Lucas has a low risk of modern slavery in its immediate supply chains as its continued commitment to assess and address the risks (as set out in section 5) provide robust processes and systems to identify and remediate any actual risks that may arise.

4.3 Finance, Banking, Wealth and Investments

Lucas does not offer services in the Financial and Banking sectors. Instead, Lucas seeks financial services exclusively from reputable financial institutions for all its financial service needs.

Lucas is a privately owned Australian business. The profits generated by Lucas are reinvested back into the Lucas business group to support its growth and development.

From time-to-time Lucas enters into joint ventures or collaborative agreements with other reputable Australian businesses.

5. Actions taken to assess and address risks

To be able to assess the risk of modern slavery in our business we rely on our robust internal policies, processes, procedures and guidelines. The following assist us to assess and address any modern slavery risks accordingly:

- HRES-GUI-102 Code of Conduct;
- HSEC-MSP-007 Suppliers, Contractors and Project Partners;
- HSEC-MSP-003 Risk & Change Management;
- HSEC-MSP-0013 Health & Wellbeing;
- HSEC-MSP-0015 Purchasing & Procurement;

- HSEC-PRO-110 Risk Assessment Procedure; and
- COMM-PRO-004 Modern Slavery Procedure.

Lucas is committed to further enhancing governance and management to address the risks of modern slavery in our operations and supply chains. Lucas has developed a Modern Slavery Procedure, the objective of which is to assist management to implement and enforce effective systems and controls to ensure that modern slavery is not taking place within our operations and supply chains.

Lucas has also included provisions within its template supply agreements (for goods and services) addressing modern slavery. Lucas continues to update other agreements to include similar provisions to ensure that we meet our obligations under the Act.

6. Assessing the effectiveness of our actions

Lucas undertakes due diligence when considering new contractors and suppliers, which includes but is not limited to a pre-qualification process addressing obligations under the Act, which assists us to identify, investigate and remediate any potential modern slavery issues that may be present.

We are in the process of creating a Modern Slavery leadership package for key personnel within the business.

Lucas will be undertaking a Modern Slavery due diligence survey of the top 50 suppliers by spend in FY2023-2024 in our supply chain in 2025.

7. Consultation process

The Management Leadership Team (Managing Director, General Manager Human Resources, General Manager HSEC&Q, General Manager Civil, General Manager Mining & Crushing, General Manager Pre-Contracts & Business Development, General Manager Operations, General Manager Maintenance, Assets & Technology and General Manager Finance) together with the Advisory Board oversee all business practices within the relevant companies we own or control, and they meet regularly to collaborate and discuss the practices of the business and how these can be improved. This statement was prepared with the collaboration and consultation from those specialists within our business and the Group's Advisory Board prior to the execution of this statement.

8. Further Information

Lucas continues to and is committed to further enhancing governance to address the risks of modern slavery in our operations and supply chains through its existing Risk Management Program and internal policies, procedures and management.

9. Execution

This statement is made pursuant to the *Modern Slavery Act 2018 (Cth)* for LUCAS TOTAL CONTRACT SOLUTIONS (HOLDINGS) PTY LTD and all wholly owned subsidiary entities² has been approved by the Group's Advisory Board on 25 November 2024 and is available on our website.

This statement is signed by Benjamin Lucas in his role as the Managing Director of LUCAS TOTAL CONTRACT SOLUTIONS (HOLDINGS) PTY LTD on 5th December 2024.


Benjamin Lucas (Dec 5, 2024 15:40 GMT+10.5)

Benjamin Lucas

Managing Director

Lucas Total Contract Solutions

² Lucas Total Contract Solutions (NLCG) Pty Ltd (ABN 57 160 650 993), Lucas Total Contract Solutions Pty Ltd (ABN 79 137 901 805), Lucas Total Contract Solutions (Services) Pty Ltd (ABN 82 131 802 054), Lucas Total Contract Solutions (TSM) Pty Ltd (ABN 30 164 314 443), Lucas Total Contract Solutions (Mining Services) Pty Ltd (ABN 51 137 901 690); Lucas Total Contract Solutions (USG) Pty Ltd (ABN 50 623 376 438), Lucas Total Contract Solutions (Mindarie 2) Pty Ltd (ABN 99 667 678 453),

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Modern Slavery Statement 2023-24 EXECUTE

Final Audit Report

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