

**KANE**

**50+ YEARS**



**MODERN SLAVERY STATEMENT  
FINANCIAL YEAR 2024 – 2025**

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



## INTRODUCTION

The construction industry continues to stand as a significant player in the global effort to address modern slavery. Kane Constructions reaffirms its commitment to combating these risks within our operations and supply chains.

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. While we acknowledge the challenges inherent in our industry, we remain dedicated to maintaining robust systems that foster transparency and ethical conduct.

In this reporting period, our focus has shifted from implementation to consolidation. We have prioritised embedding our established frameworks and ensuring that the policies, training, and tools developed in previous years are effectively used across our projects to mitigate risk.

## 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 500 employees.

We operate across a diverse range of sectors including commercial, healthcare, aged care, heritage and restoration, retail, education, 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.

## OUR VALUES: THE KANE WAY

Our way of doing business underpins everything we do.

- **Trust:** Act with integrity and honesty at all times. Deliver on our promises.
- **We Value People:** Safety is at the core of our business. We will always look after each other and respect all people.
- **Our Unique Culture:** ‘Own it’ – make the right decisions. We are empowered and supported.
- **Entrepreneurial Drive:** Exhibit drive – we are problem solvers first and foremost. Be open to learning and change.
- **Relationships:** Encourage teamwork, seek shared wins, and develop positive relationships at all levels.
- **Social:** Consider the social and environmental implications of our activities.



## ASSESSING OUR SUPPLY CHAIN

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

Our supply chain is extensive and intricate, involving subcontractors and suppliers responsible for delivering materials, equipment, and services essential for our national construction projects. We also procure goods vital for our business, such as ICT equipment, safety gear, branded attire (boots, hard hats, hi-vis), and office consumables.

### Supply Chain Origins

The majority of our supply chain is based on materials and operations created and run within Australia. However, through our ongoing assessments, we continue to monitor products and materials originating from higher-risk regions including China, United Kingdom, 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 continues to acknowledge the risk factors inherent in the construction industry.

We have maintained our focus on assessing the following specific high-risk items in the context of our supply chain:

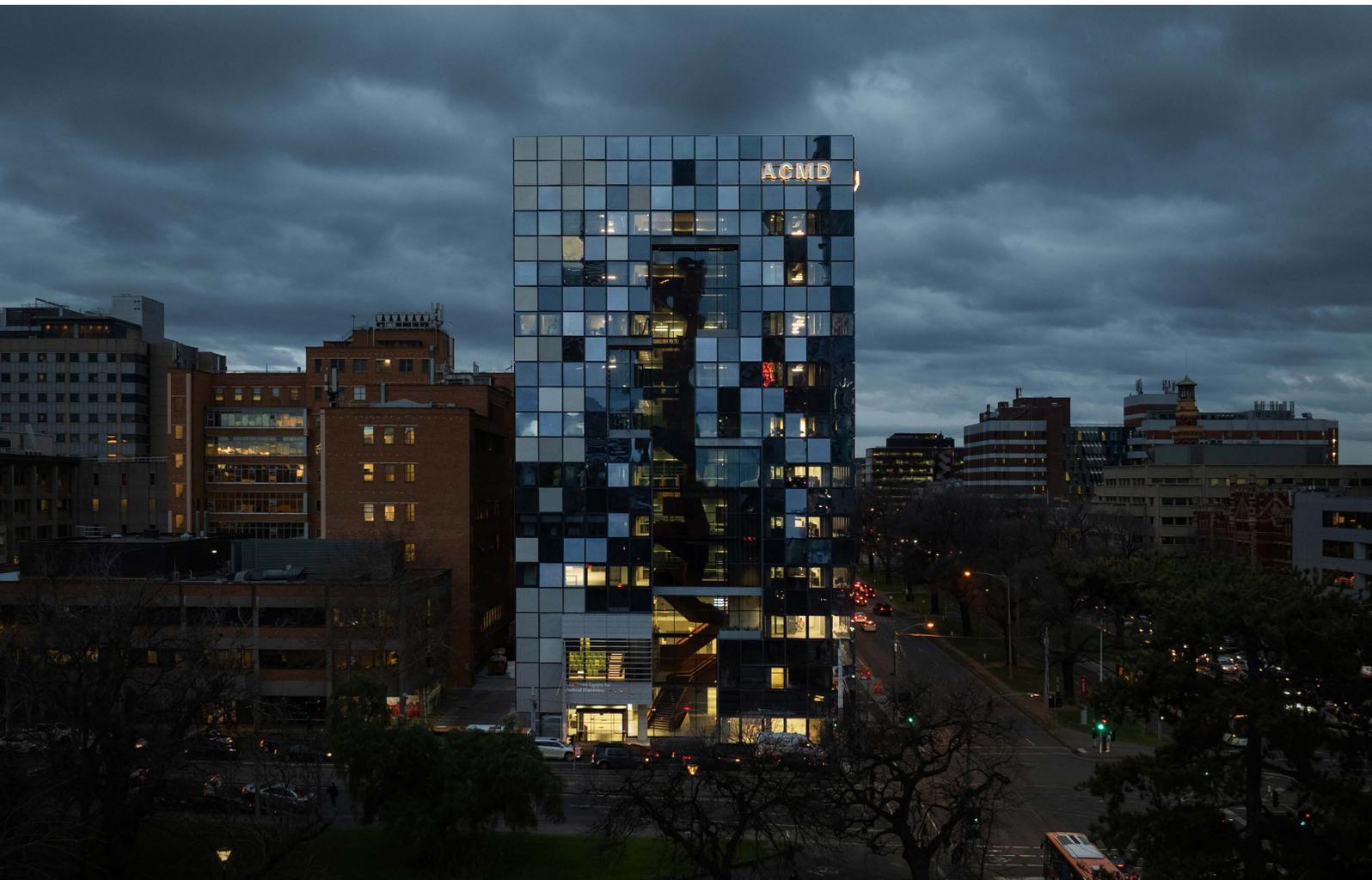
- **Countries of origin:** Manufacturing products and sourcing material.
- **Labour hire:** Transient labour services provided by migrant workers, casual employees, and low-skill workers.
- **Lack of grievance procedures:** Smaller businesses with limited policies and procedures.

## ACTIONS TAKEN

Throughout the financial year, Kane has focused on the continuity and effectiveness of our established anti-slavery framework. Our priority has been to ensure that our policies are not just written, but actively understood and applied.

### Key Actions Dashboard

PRIORITY	ACTION		COMMENTS
POLICY & PROCEDURE DEVELOPMENT	Annual review of Kane’s Modern Slavery Policy	✓	Completed
DUE DILIGENCE	Continued issue of Modern Slavery Questionnaires to subcontractors.	✓	Embedded into the procurement phase for trade packages.
	Track and measure data from Tender Interviews.	✓	Continued assessment of subcontractor understanding of risk during the tender phase.
TRAINING & EDUCATION	Internal and external training sessions	✓	44 employees undertook training on identifying and responding to risks.
	Distribute Modern Slavery Guidebook to subcontractors.	✓	We continued to communicate and educate our subcontractors during the assessment process.
COLLABORATION	Modern Slavery Strategy and Review Meetings.	✓	Regular internal reviews to ensure compliance and process efficacy.



## DUE DILIGENCE AND PROCESS

Our tender and evaluation processes remain our primary defence against modern slavery risks. We expect our supply chain to work in line with our values and comply with all legislative obligations.

### Tender Interviews

We have continued to use our specific tender interview questions to determine whether subcontractors have appropriate policies, standards, and codes of practice. These responses are recorded and evaluated before commencing business and are embedded into our contracts.

### Whistleblower Protections

Kane remains committed to fostering a culture where everyone feels safe to speak up. Our Whistleblower Policy is available internally and to third parties to ensure disclosures regarding suspected misconduct are handled in an objective, secure, and confidential manner.

### Modern Slavery Prevention Guidebook

We continued to use our established Modern Slavery Toolkit and Guidelines. This Guidebook provides information on our obligations under the Modern Slavery Act 2018 (Cth), our action plan, and information on how Kane can support our subcontractors.

## Assessing the Effectiveness of Our Actions

Kane regularly assesses the effectiveness of the actions taken to address modern slavery risks in our operations and supply chains. This includes:

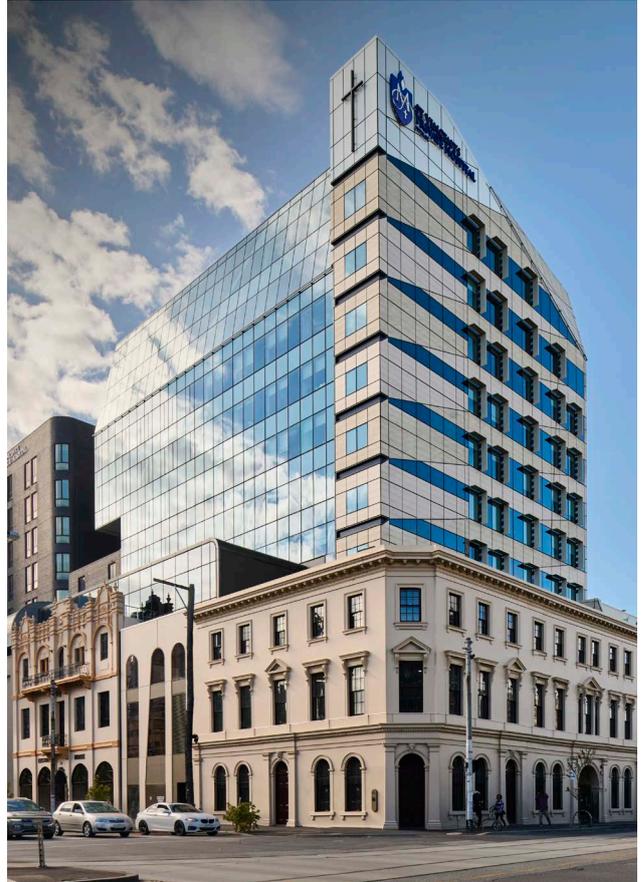
- Monitoring and reviewing the outcomes of our due diligence processes, including supplier questionnaires and tender interviews.
- Tracking the completion and impact of training programs for employees and subcontractors.
- Evaluating feedback from stakeholders, including employees, suppliers, and subcontractors, regarding our modern slavery policies and procedures.
- Reviewing the number and nature of reports received through our Whistleblower Policy and grievance mechanisms.

## Remediation of Modern Slavery Practices

Kane is committed to taking prompt and effective action if any instances of modern slavery are identified within our operations or supply chains. Our remediation process includes:

- Investigating all reports of suspected modern slavery practices thoroughly and confidentially.
- Working collaboratively with affected individuals, suppliers, and relevant authorities to address and resolve issues.
- Providing support to victims, including access to appropriate services and protections.
- Reviewing and updating our policies and procedures to prevent recurrence.
- Reporting any confirmed instances of modern slavery to relevant authorities in accordance with legal obligations.





## CONSULTATION AND APPROVAL

### Consultation with Controlled Entities

The actions taken to assess and address risks across 'Kane' cover both Kane Constructions Pty Ltd and Kane Constructions (QLD) Pty Ltd. Kane Constructions (QLD) Pty Ltd is a wholly owned subsidiary of Kane, run by the same board, using the same systems, policies, and procedures. Consultation occurs continuously through shared Directorship, national management meetings, and the implementation of unified group policies.

### Approval

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

Richard Frisina

Tristan Forster

**JOINT MANAGING DIRECTORS**