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2024 MODERN SLAVERY STATEMENT

Dwyer is a private and independent Australian company. The office is located in Harvey, Western Australia. Operating since 1999 and being 100% Western Australian owned, this family oriented company has a strong focus on personnel safety and encourages a positive culture within the company.

Our approach to Modern Slavery is underpinned by our commitment to strengthening our approach to preventing modern slavery practices and efforts to better assess and manage this risk. By taking a targeted approach and focusing on specific high risk sectors we believe we are setting a strong foundation not only across our areas of operations or supply chains, but for the future.

The Commonwealth of Australia Modern Slavery Act (2018) has defined eight forms of serious exploitation:

1. Trafficking in persons
2. Slavery
3. Servitude
4. Forced marriage
5. Forced labour
6. Debt bondage
7. Deceptive recruiting for labour or services
8. The worst forms of child labour - where children are subjected to slavery, similar practices, or engaged in hazardous work.

Dwyer is committed to identifying and addressing our modern slavery risk, and to maintain responsible and transparent supply chains.

IDENTIFYING THE RISKS OF MODERN SLAVERY PRACTISES

Risk Assessment

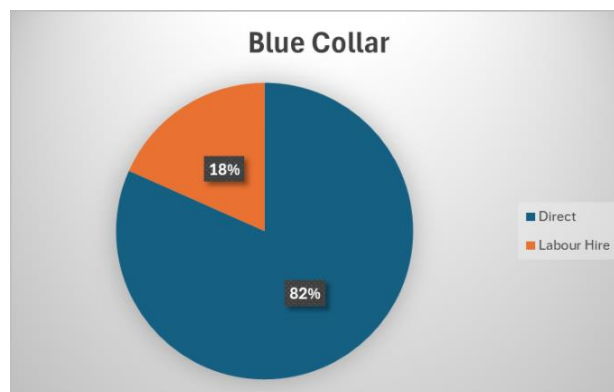
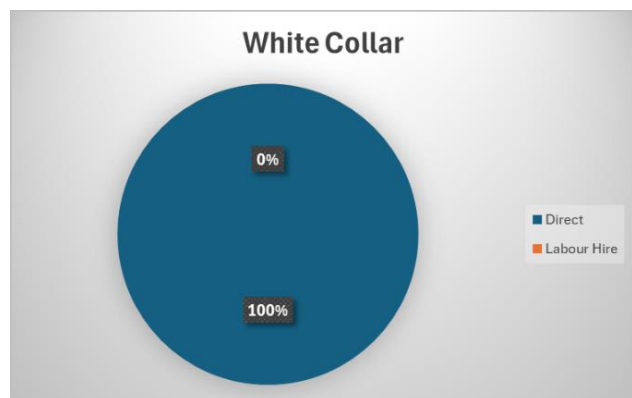
During the reporting period, we conducted a risk screen of all our suppliers based on their geographic location and the industry they work in. With 100% of our suppliers based in Australia, our overall supply chain risk rating was low; however, based on industry classification, 15% of our suppliers were considered medium risk.

This enables us to identify and consider risks that may possibly cause or contribute to modern slavery practices together with the type of industry and type of products and services being supplied. The outcome of the assessment assisted with our prioritisation and implementation of our supplier engagement.

Potential risks of Modern Slavery Practices in Operations

The majority of Dwyers workforce are directly employed and on an employment contract which meets the applicable employment legislation. The direct engagement therefore will reduce the modern slavery risks.

The following graphs demonstrate Dwyer's workforce:



All staff within Dwyer are expected to comply with all laws and act in accordance with regulations. A training module on modern slavery forms part of the Induction undertaken by new employees. Dwyer are committed to ensuring that 100% of employees have completed the induction before commencement of work. Should any of our employees need any additional information or support regarding human trafficking, forced labour, servitude, and slavery this will be provided.

Dwyer Engineering has conducted pre-qualification assessments on the labour hire companies it engages to ensure appropriate work rights and pay rates are in place for all workers, Dwyer has less direct visibility and control over these workers and their employment terms. Dwyer recognises there are potential modern slavery issues within the third-party labour arrangements, which may include excessive working hours, underpayment or non-payment.

Potential risks of Modern Slavery Practices in Supply Chains

Dwyer endeavours to procure all materials and consumables for its projects locally with all of Dwyer Engineering procurement spend in the financial year ending 2023 in Australia. Dwyer Engineering has developed strong long-term relationships with its suppliers in order to ensure quality, consistency and reliability of supply.

The likelihood of modern Slavery in supply chains is low and lies in the suppliers or subcontractors' non-compliance with Dwyer's policies and standards, including excessive overtime and migrant labour exploitation.

Supply Chain Assessment

The main types of goods and services procured by Dwyer Engineering is steel.

The majority of steel is sourced from Australian mills with the balance originating from mills in China, South Korea, the United Arab Emirates, Thailand, New Zealand and Indonesia.

ACTIONS TAKEN FOR IDENTIFIED RISKS

Strategies	Action
Procurement process	Clear process to manage modern slavery risks.
Procurement process	All new employees upon induction into procurement roles receive initial and ongoing Modern Slavery awareness training.
Subcontractors Pre-qualification	Add in additional measures to address modern slavery legislation.
Risk register	Detailed list of all key risks to be reviewed by management
Internal learning and development plans	Training and awareness of modern slavery.
Leadership	Review performance on an annual basis.
Education	Training regarding modern slavery for employees.
Suppliers/Subcontractors locally sourced	Introduce modern slavery assessment criteria within supplier compliance audits.

IMPROVEMENT APPORACH

Dwyer will assess the effectiveness of the actions taken to address the potential risk of Modern Slavery by conducting an annual management meeting to review our response to modern slavery and progress against the specific steps/actions we have taken to assess modern slavery risks and report on open, outstanding and complete actions.

Similarly, we will work with suppliers to review how they have progressed and any actions they have put in place to address modern slavery risks.

Dwyer has policies in place which promote legal and ethical business conduct. These are reviewed yearly and receive management approval.

- Continue to follow up on supplier assessments;
- commence development of a supplier code of conduct; and,
- continue the ongoing review and enhancement of its modern slavery prevention framework and associated policies and procedures.

ASSESS THE EFFECTIVENESS OF ACTIONS

Dwyer's focus was to gain a better understanding of our modern slavery risks and how such risks may be present in our operations and supply chains. We have commenced to assess the effectiveness of measures and will continue to work on processes to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains.

We recognise that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to continue to build upon. Over the next reporting period, Dwyer will develop KPIs and further metrics to assess the effectiveness of our actions.

CONSULTATION AND APPROVAL

This statement has been prepared by Dwyer Engineering Management team in consultation with our HR and Safety Managers. This team is responsible for overseeing our modern slavery policy and procedures and reviewing them annually to ensure they continue to evolve.

This statement was approved by the principal governing body of Dwyer Engineering and Construction on 6th January 2025.

We do not own or control any other entities



Joe Dwyer
Managing Director
Dwyer Engineering and Construction Pty Ltd