



# MODERN SLAVERY STATEMENT

FOR THE  
ERTECH HOLDINGS  
GROUP OF COMPANIES

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## 1 REPORTING ENTITY AND STRUCTURE

The Ertech Holdings Group welcomes the establishment of the Commonwealth Modern Slavery Act 2018 in order to identify and address modern slavery in supply chains of Australian businesses. The Ertech Holdings Group acknowledges that it has an obligation to protect human rights, starting from the way it conducts its business now, and into the future.

The Ertech Holdings Group is committed to ensuring that there is transparency in its operations and approach to tackling modern slavery and wishes to prevent modern slavery from ever taking place in its operations and supply chains.

### ERTECH HOLDINGS GROUP FRAMEWORK

The Ertech Holdings Group is a values driven organisation which operates within an integrated framework of values, principles and ethical obligations designed to guide business performance and set clear expectations for internal culture and business conduct.

This framework incorporates:

- Our Values
- Our Way
- Our Code

Each of the components of the framework is briefly outlined below.

#### OUR VALUES

<b>INTEGRITY</b>	A fair and honest approach in all our dealings Honouring all our commitments Responding positively to others
<b>ACCOUNTABILITY</b>	Each of us “Getting it right and on time”
<b>COURAGE</b>	Willingness to “Have a go” and find better ways
<b>PRIDE</b>	In our people, equipment and our work
<b>RECOGNITION</b>	Of individual and team performance and supporting personal growth

#### OUR WAY

The signature employee behaviours that demonstrate our values and underpin our success and support our People, Performance and Capability.

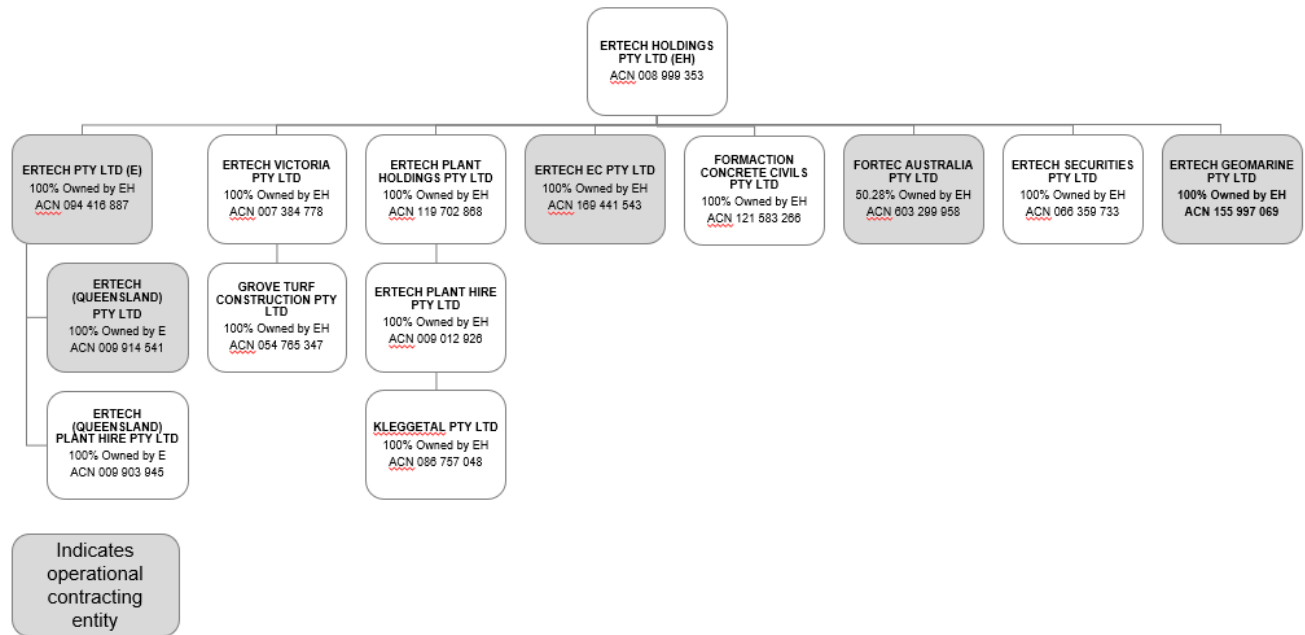
#### OUR CODE OF BUSINESS CONDUCT (OUR CODE)

The business principles we follow to demonstrate and ensure our integrity to all stakeholders.

- Individually and with fellow employees
- With our community and governments
- With our clients and business partners
- When using business resources

Ertech Holdings established in 1981 is the parent company and the reporting entity for this statement, with the corporate structure as follows:

## STRUCTURE



Operational Entities	Structure	Operations
Ertech Holdings (Parent)	Company	Ertech Holdings is the ultimate holding company for the entities listed. Ertech Holdings provides a range of civil and concrete construction, geotechnical, environmental, marine, electrical, piping, and project management services across Australia through its subsidiaries.
Ertech Pty Ltd	Company	Ertech delivers a diverse range of engineering construction services for resources, transport, water, utilities and government (Federal, State and local) clients across Australia.
Ertech (Queensland) Pty Ltd	Company	Ertech (Queensland) is a highly respected civil engineering construction company which is a wholly owned subsidiary of Ertech Pty Ltd.
Ertech (EC) Pty Ltd (Ertech Electrical)	Company	The focus of Ertech EC (Ertech Electrical) is to self-perform electrical works associated with civil contracts undertaken by the group.
Ertech Geomarine Pty Ltd	Company	Ertech Geomarine specialises in working within port and near-shore environments; ground improvement and stabilisation and geotechnical works.
Fortec Australia Pty Ltd	Company	Fortec provides a diverse range of specialist construction, engineering and geotechnical services to private and public sector clients, including water and road authorities and private developers of infrastructure, commercial, industrial and residential developments

## 2 SUPPLY CHAIN

Effective management of our supply chain is integral to the success of every project that we undertake. Our suppliers and subcontractors are considered an extension of our project delivery team and as such are required at a minimum to meet the standards and requirements of our clients. Should Ertech Holdings Group's standards exceed that of our client's then our suppliers are required to meet Ertech Holdings Group's standards and requirements.

The awarding of contracts to suppliers and subcontractors is determined not only on the grounds of price and technical ability but also past quality, safety and environmental performance and present ability to carry out work safely and without risk to health and environment.

Ertech Holdings Group recognises the importance of effectively managing suppliers and contractors throughout the project lifecycle, to ensure high levels of performance and compliance. Once a subcontractor has been engaged, our team has a suite of procedures and processes which enables the project team to effectively manage subcontracted service delivery and suppliers.

### 2.1 MODERN SLAVERY IN SUPPLY CHAINS AND OPERATIONS

Modern slavery has a broad scope and includes practices involving slavery or slavery like offences, forced labour, deceptive recruiting for labour or services, forced marriage offences, debt bondage, threats of coercion, trafficking in persons and/or children, organ trafficking, and/or harbouring a victim.

The Modern Slavery Act 2018 (Cth) (**MSA**) draws on principles adopted in the 2011 United Nations Guiding Principles on Business and Human Rights (**UNGPs**). The UNGPs set a global standard of expected conduct for all business enterprises.

Ertech Holdings understands that modern slavery is unlikely to prosper where other human rights are respected and therefore undertakes to comply with the MSA, the UNGPs, and all other applicable modern slavery and human rights laws and frameworks, and expects all employees, suppliers and subcontractors to comply with these commitments as well.

Ertech Holdings believes that all business enterprises should respect human rights and address any adverse impact their business practice has or may have on human rights, as all people have the right to protection from exploitation, violence, and/or abuse. As such, Ertech Holdings has a zero-tolerance approach to modern slavery within its operations and supply chain.

Ertech Holdings seeks to do business with suppliers who have similar values, ethics, and sustainable business practices, including in relation to human rights, and also understands that the risks relating to suppliers will vary depending on industry, geographic location, and company size. At Ertech Holdings, all staff have a responsibility to prevent, identify, and report on concerns they may have in relation to modern slavery within Ertech Holdings' operations and supply chains.

Ertech Holdings seeks compliance with modern slavery legislation from suppliers through acceptance of the terms and conditions included within supplier, subcontractor, and/or consultancy agreements, and via the raising of purchase orders.

### 2.2 MODERN SLAVERY DUE DILIGENCE AND ASSESSMENT

As the primary work of Ertech Holdings involves engineering, construction, and use of natural resources, Ertech Holdings has identified the risk of modern slavery within its supply chains, in so far as Ertech Holdings may contribute to, or be directly linked to, modern slavery practices as its acts may facilitate modern slavery or be connected to modern slavery through the activities of its supply chain. Ertech Holdings has risk management processes to assist in identifying areas of concern to allow mitigating action to be taken to lessen those risks, including:

- a) inclusion of mandatory modern slavery clauses in all procurement contracts including purchase orders, labour hire contracts, supply agreements, subcontracts etc
- b) due diligence processes when approving new suppliers to work with Ertech Holdings

- c) a Code of Business Conduct, which details corporate expectations on all personnel and suppliers including in relation to preventing modern slavery
- d) a Whistleblower Policy, which enables the confidential reporting of any concerns relating to modern slavery in Ertech Holdings' operations or within supply chains
- e) a supplier pre-qualification process which assists in identifying the need for any auditing
- f) modern slavery training for all staff regarding the risks Ertech Holdings faces in relation to modern slavery in its supply chains
- g) processes to ensure compliance with the MSA.

In order to continually assess the effectiveness of the actions it is taking to assess and address the risks of modern slavery practices in its operations and supply chains, Ertech Holdings will:

- a) periodically review the actions taken to assess and address the risks of modern slavery practices
- b) continue regular engagement and feedback between key areas of Ertech Holdings' business involved in assessing and addressing the risks of modern slavery – procurement, human resources and legal
- c) continue to work with its suppliers and subcontractors to ensure compliance with the MSA and Ertech Holdings' Code of Business Conduct.

## 2.3 CONSULTATION WITH OTHER GROUP ENTITIES

As stated above in section 1 of this statement, the Ertech Holdings Group comprises various entities, whose operations are also detailed above. In developing this statement, the key stakeholders were made aware that Ertech Holdings was preparing this statement and have been consulted and provided an opportunity to participate in the process of preparing this statement.

## 2.4 ADDITIONAL RELEVANT INFORMATION

Further to section 2.2 above, Ertech Holdings will provide training to staff on identifying modern slavery risks in supply chains generally and ensuring compliance with Ertech Holdings' obligations under the MSA, and commits to ensuring training is held with reasonable frequency. Ertech Holdings also commits to ensuring further training is provided for staff in positions where they are directly involved with procurement processes and managing relationships with suppliers.


All Ertech Holdings staff have a responsibility to prevent, identify and report any concerns they may have in relation to modern slavery within Ertech Holdings' operations and supply chains. Such concerns are to be reported to the appropriate manager or otherwise in accordance with the Code of Business Conduct and Whistleblower Policy. All reports of concerns relating to modern slavery will be treated with sensitivity, confidentiality and will be taken very seriously.

Any party who breaches the Code of Business Conduct by engaging in, or conspiring to, engage in any modern slavery conduct will face the appropriate disciplinary action. For instance, Ertech Holdings may terminate its relationship with individuals and/or organisations working on our behalf. Referral of action to the proper authorities will be taken in cases involving breaches of the criminal law.

## APPROVAL AND EXECUTION

Approved by the Ertech Holdings Pty Ltd Board of Directors on 29 March 2021.

Signed in accordance with the requirements of the Modern Slavery Act 2018 (Cth);

  
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Gavin Robert Miller  
Executive Chairman

29 March 2021

Date