

JOINT MODERN SLAVERY STATEMENT



2024

Acknowledgement
of Country

Delta Group acknowledges First Nations Australians as the Traditional Owners of the land and sea upon which we work. We recognise their living cultural and natural landscapes and pay our respects to Elders past, present and emerging.

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REPORTING ENTITY
ENTITY STRUCTURE, OPERATIONS AND SUPPLY CHAINS
RISKS OF MODERN SLAVERY PRACTICES
ACTIONS TAKEN BY THE REPORTING ENTITY
ASSESSMENT OF ACTIONS TAKEN
PROCESS OF CONSULTATION

Introduction

As reporting entities under the Commonwealth Modern Slavery Act 2018 (**‘the Act’**), Delta Group Holdings Pty Ltd and Delta Pty Ltd (**‘Delta Group’**) are obligated to publish a Modern Slavery Statement for the financial year ending 30 June 2024.

Delta Group Holdings Pty Ltd is a common holding company incorporating the following subsidiaries and related entities that are subject to common control by the single largest shareholder:

- + Delta Pty Ltd (*Joint Reporting Entity*)
- + Delta Recycling Pty Ltd
- + Delta Rent Pty Ltd
- + Browns Piling Pty Ltd
- + BRC Piling and Foundations Pty Ltd
- + CMA Contracting Pty Ltd
- + Whelan the Wrecker Pty Ltd
- + Clifton Grange Pty Ltd
- + EPH Group Holdings Pty Ltd
- + Delta SKIPZ Pty Ltd

No significant changes, events, matters or circumstances have arisen or occurred since 30 June 2023.



Joint Statement

In accordance with the Act, Delta Group has chosen to publish a Joint Modern Slavery Statement. This Joint Statement has been prepared in consultation with each reporting entity as well as each subsidiary and related entity under common control.

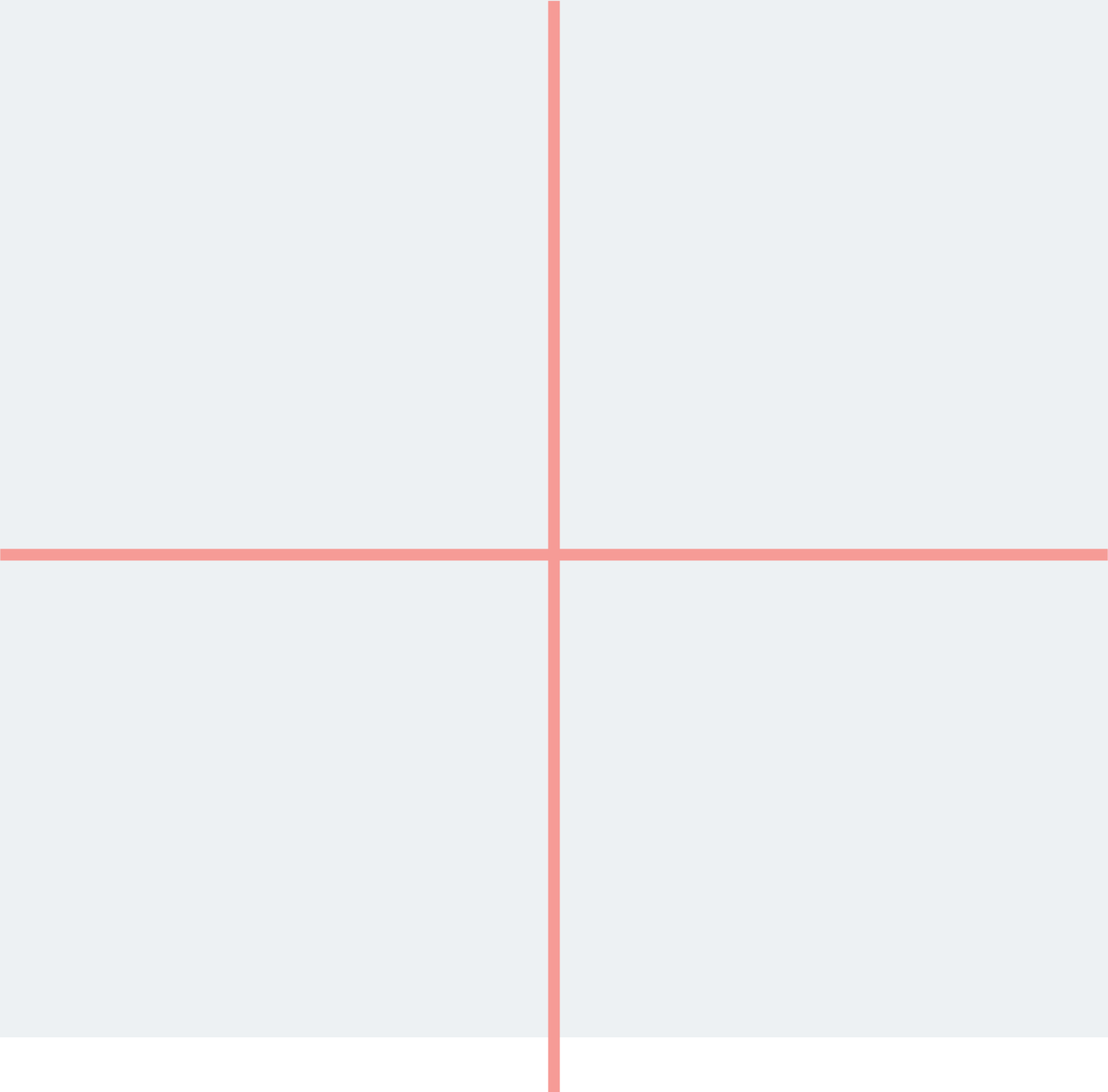
We have addressed all of the mandatory reporting criteria and received the approval of our Principal Governing Body, on behalf of each reporting entity.

This Joint Statement was approved by Con Petropoulos; Sole Director of Delta Group Holdings Pty Ltd, in the capacity of Principal Government Body and as the parent entity of Delta Pty Ltd on 20 December 2024.



Con Petropoulos
DIRECTOR

Delta Group Holdings Pty Ltd
20 December 2024



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Structure

Our organisational structure includes key divisions based upon operational (entity specific) and/or geographical (State or Territory specific) contracting services, with specific market sectors and/or contracting services differentiating them from other group entities. An executive management team is responsible for group wide culture and performance, including compliance with the Act.

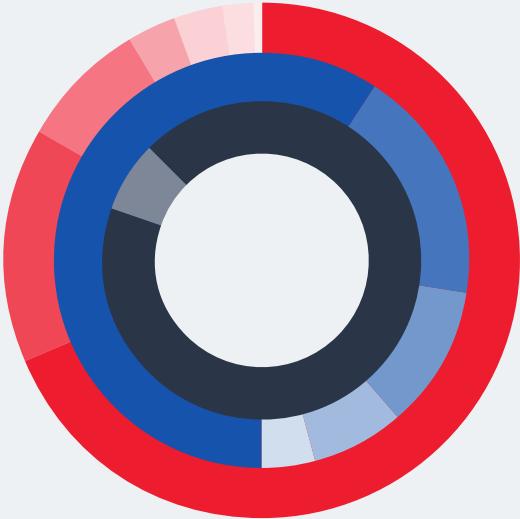


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Operations

Delta Group operates solely in Australia with day-to-day operations involving the supply of diversified and integrated contracting services to a wide range of clients spanning industrial and urban (commercial) sectors.

Established in Victoria since 1988, Delta Group now operates in all States and Territories of mainland Australia with offices in Darwin, Brisbane, Sydney, Canberra, Melbourne, Adelaide and Perth, as well as regional branches in Karratha, Latrobe Valley, Illawarra and Hunter Valley.



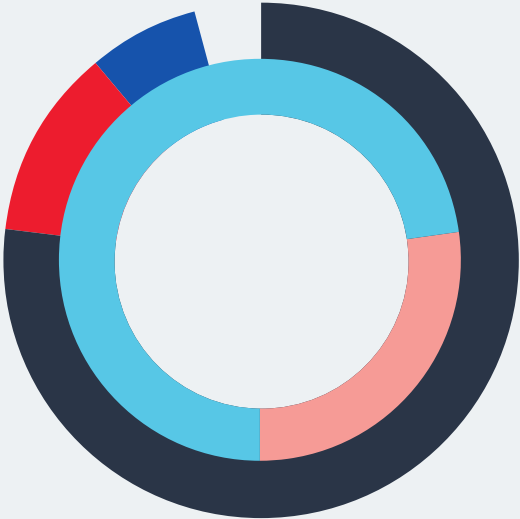
+ Organisational Capacity (People)

VIC	65%
NSW	15%
QLD	8%
SA	5%
WA	4%
ACT	2%
NT	1%

Labourers & Operators	64%
Corporate Services	16%
Engineers	8%
Foreman & Supervisors	8%
Management	5%

Male	92%
Female	8%

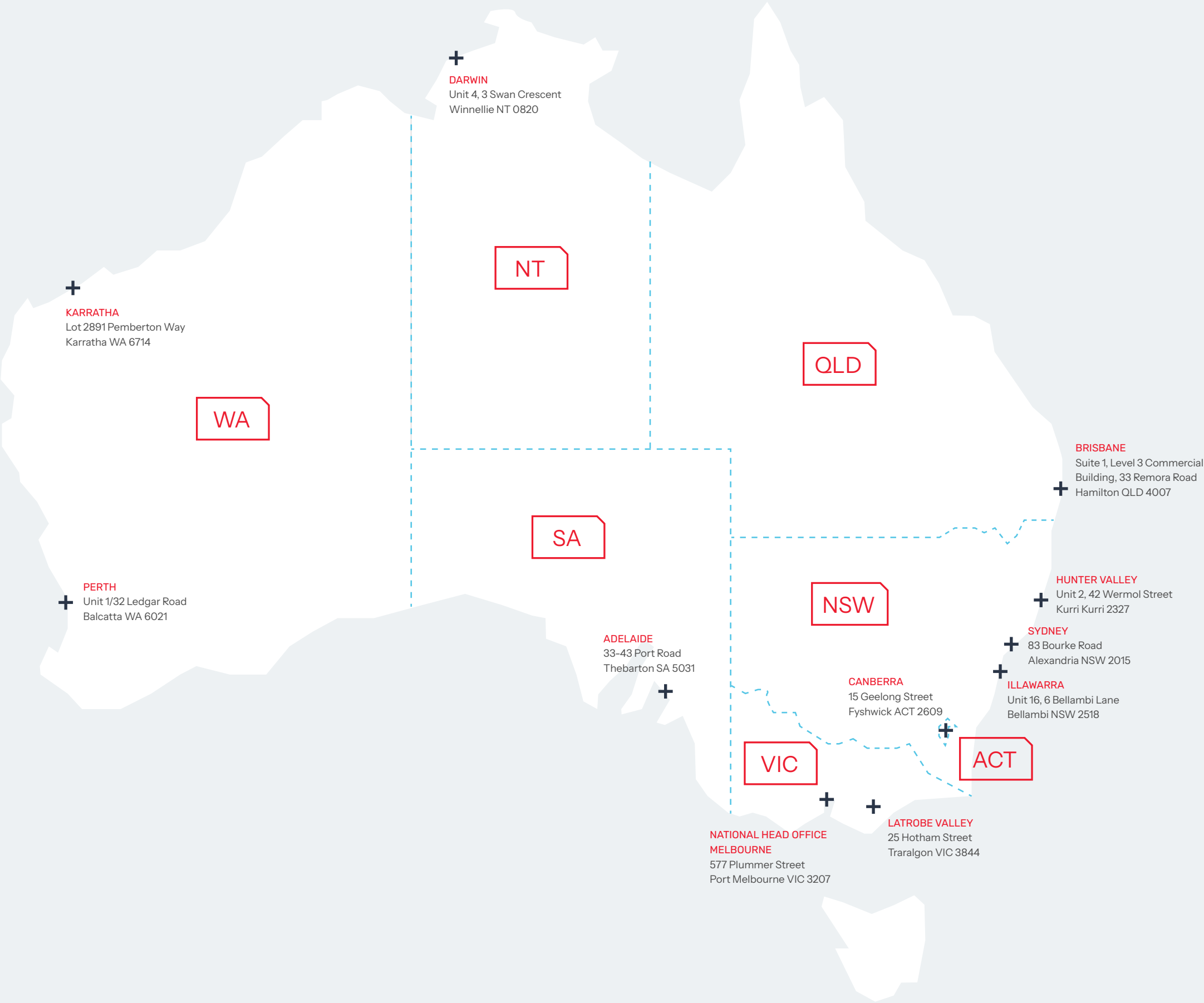
Apprentices & Trainees	4%
Interns, Cadets & Graduates	3%



+ Revenue splits

Urban	77%
Industrial	12%
Heavy Plant Hire	7%
Recycling	4%
Commercial	73%
Government	27%

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Supply Chains

Delta Group’s national and international supply chains remain consistent with previous Joint Statements, with more than 2,000 prequalified suppliers incorporating specialist manufacturers, subcontractors, consultants and traditional commercial vendors.

The type or size of businesses vary depending on the good or service provided, from SOHO and SME businesses to medium, large and multi-national enterprises. Similarly, suppliers are grouped according to their geographical location, including regional, State or Territory and national businesses.

Approximately 95% of the goods and services we procure are sourced from Australian based suppliers or manufactured in Australia. A limited and highly specialised range of goods are manufactured offshore and sourced through Australian distributors, including (but not limited to) plant and equipment, spare parts, IT&T hardware and software, and power tools and batteries.



Australia

Transport & Haulage; Drilling, Piling & Foundations; Scaffolding; Occupational Hygiene; Professional Services; Engineering Design; Environmental Monitoring & Analysis; Geotechnical Analysis & Surveying; Asbestos Removal; Cranage & Rigging; Concrete, Asphalt & Steel Supply; Uniforms & PPE; Emergency & Disaster Response; Horticultural Design & Installation; Arborist Services; Electrical, Hydraulics & Plumbing Trades; Archaeological & Cultural Surveys; Labour Hire – Security, Cleaning, Traffic Management; Training; Lighting; Office Furniture, Supplies & Consumables; Accommodation & Travel; Soil & Water Remediation; Landscaping; Construction Materials; Waste Management & Landfill



China

IT&T Hardware; Heavy Plant, Equipment & Spare Parts; Power Tools & Batteries; Steel Concrete; Rubber; Landscaping Supplies; Construction Materials; Geotextiles & Waterproofing Membranes; PPE & Face Masks; Cleaning Products; Uniforms; Office Supplies & Furniture



Japan & South Korea

IT&T Hardware; Heavy Plant, Equipment & Spare Parts; Light Vehicles & Spare Parts; Power Tools & Batteries



USA & Mexico

Heavy Plant, Equipment & Spare Parts; Power Tools & Batteries; Geotextiles & Waterproofing Membranes; Light Vehicles & Spare Parts; IT&T Hardware



UK & Europe

IT&T Hardware; Heavy Plant, Equipment & Spare Parts; Power Tools & Batteries



Thailand

Light Vehicles & Spare Parts; Construction Materials; Landscaping Supplies; IT&T Hardware



India & Pakistan

Construction Materials; Landscaping Supplies; Uniforms & PPE



Taiwan

Power Tools & Batteries



Malaysia

IT&T Hardware; Power Tools & Batteries



Indonesia

Construction Materials; Landscaping Supplies; Rubber

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	PRODUCT/ SERVICE RISK	GEOGRAPHIC RISK	SECTOR RISK	ENTITY RISK
DIRECTLY CAUSES MODERN SLAVERY	NEGLIGIBLE	NEGLIGIBLE	NEGLIGIBLE	NEGLIGIBLE
DIRECTLY LINKED TO MODERN SLAVERY	MEDIUM- NEGLIGIBLE	MEDIUM- NEGLIGIBLE	MEDIUM- NEGLIGIBLE	MEDIUM- NEGLIGIBLE
DIRECTLY CONTRIBUTES TO MODERN SLAVERY	MEDIUM- HIGH	MEDIUM- HIGH	MEDIUM- HIGH	MEDIUM- HIGH

Modern Slavery Risk Assessment

Just as our supply chains have remained consistent with previous Joint Statements, our Modern Slavery Risk Assessment remains unchanged.

Forced Labour, Child Labour, Servitude and/or Trafficking in Persons represent the highest risk forms of modern slavery across Delta Group supply chains.

The risk that Delta Group directly causes any type of Modern Slavery as a result of our operations remains negligible and the risk that Delta Group is directly linked to modern slavery is medium-to-negligible.



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Key Actions

Certified Management Systems

Delta Group is continuing to investigate ISO 20400 certification of our procurement management systems.

Management Training

Ongoing training of executive, divisional and frontline management personnel.

Prequalification Assessments

A total of 1,017 prequalification assessments were completed in FY24. New suppliers accounted for 45% of total assessments.

Staff Inductions

New and existing personnel are inducted (or re-inducted) into Delta Group corporate policies, including modern slavery.

Auditing

Audit surveys continue to target suppliers involving the highest risk goods and highest risk countries of origin or manufacture. In particular, staff uniforms and Personal Protective Equipment (PPE).

Sustainability Working Group

A dedicated working group of key personnel was established to propose recommendations to the executive management for commercial (corporate) targets and to also prioritise key initiatives, policies and programs.

BI Tools & Systems

Delta Group have identified a local technology supplier for tracking and reporting on social procurement activity Australia wide.

Contracts Review

All Delta Group (and related entity) Major Subcontract Agreements now include clauses relating to modern slavery.



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FRAMEWORK
Governance & Policy

ACTION

- + Sustainability Working Group
- + ISO management system certification
- + Contracts review
- + Staff inductions
- + Management training

MEASURE

- + Executive management oversight
- + Meeting minutes/attendance
- + % staff inducted
- + % management trained
- + % contracts with T&Cs

FRAMEWORK
Supply Chains

ACTION

- + Prequalification assessments
- + Targeted Audits

MEASURE

- + Supplier segmentation per risk profile and (product/service) rating
- + % of targeted audits complete

FRAMEWORK
Monitoring

ACTION

- + BI Tools & Systems

MEASURE

- + Social (and sustainable) procurement tracking/reporting
- + % audits complete
- + Audit risk ratings/profiles

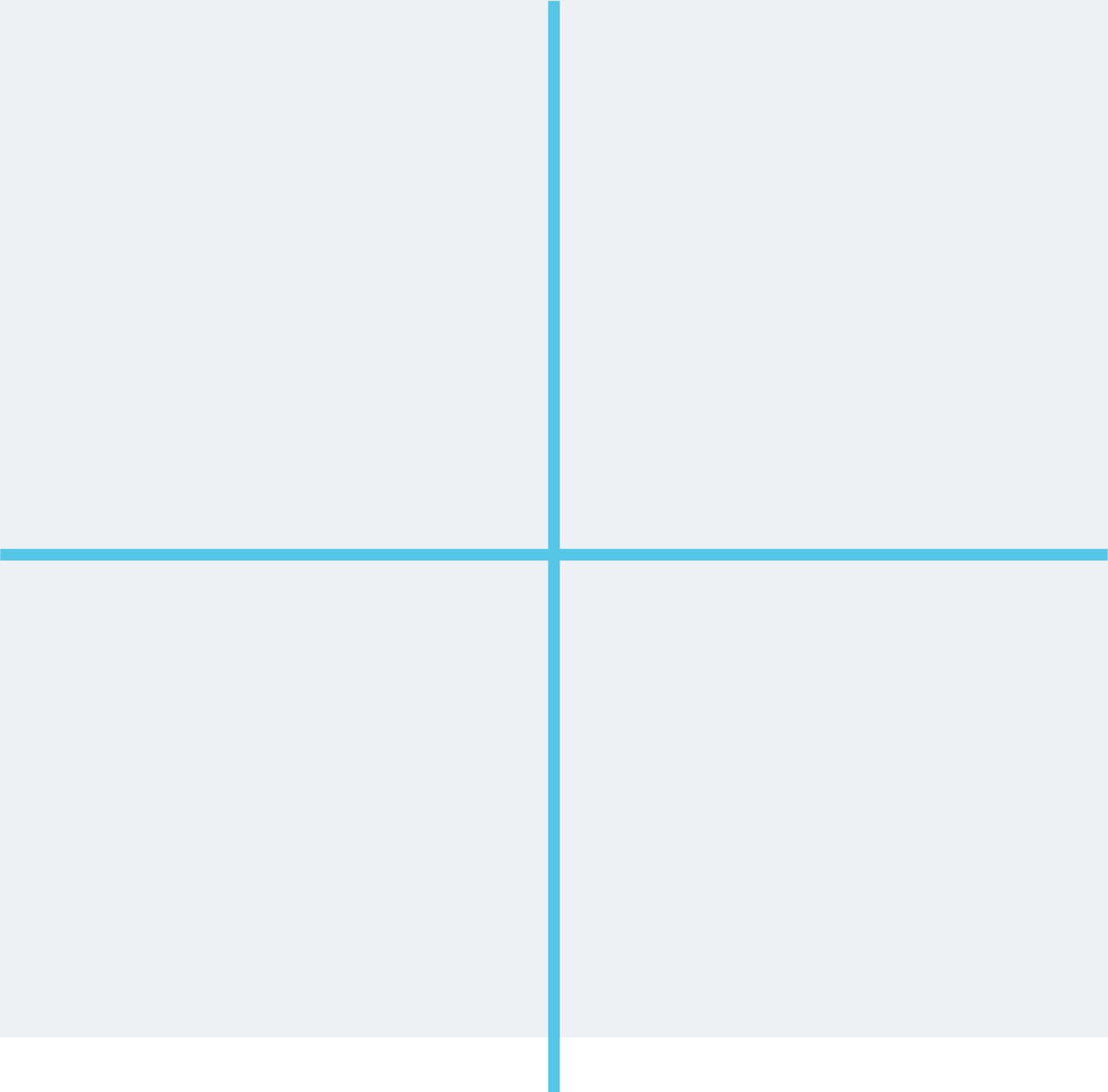
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Consultation

In accordance with the act, executive and senior management from Delta Group and all related and controlled entities have been consulted in the preparation of our Joint Modern Slavery Statement 2024.

Consultation took place by way of online (Microsoft Teams) meetings, email and telephone calls.

Key executives were involved in the production of this Joint Modern Slavery Statement prior to its approval by our Managing Director; in their capacity as Principal Governing Body under the Act.



Mandatory Reporting Criteria

Page 3

Identify the reporting entity

Pages 5–7

Describe the reporting entity’s
structure, operations and supply chains

Page 8

Describe the risks of modern slavery
practices in the operations and supply
chains of the reporting entity and any
entities the reporting entity owns or controls

Page 10

Describe the actions taken by the
reporting entity and any entities that
the reporting entity owns or controls to
assess and address these risks, including
due diligence and remediation processes

Page 11

Describe how the reporting
entity assesses the effectiveness
of actions being taken to assess
and address modern slavery risks

Page 12

Describe the process of
consultation with any entities the
reporting entity owns or controls

N/A

Any other relevant information



An abstract graphic on the left side of the image, consisting of a dark blue background with a pattern of light blue diagonal lines. The lines are arranged in a way that creates a sense of depth and movement, with some lines appearing to recede into the distance.

*SHAPING
TOMORROW*