



# Modern Slavery & Human Trafficking Statement 2024

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## Introduction

Modern slavery is a severe violation of human rights that strips individuals of their liberty and dignity for the benefit of others. It remains a global issue, affecting millions of people, many of whom are subjected to various forms of exploitation in both developing and developed countries. Every company, regardless of industry or location, faces the risk of inadvertently contributing to this crime through its operations or supply chain.

At Underground Construction Alliance (UCA), we are committed to eradicating modern slavery and human trafficking within our organization and supply chain. We have adopted a zero-tolerance stance and have implemented concrete actions to mitigate risks, as outlined in this statement. This document details the steps UCA has taken to identify, assess, and mitigate the risks of modern slavery in our operations and supply chain during the financial year 2024.

## Governance and Oversight

UCA's Board of Directors and senior management review anti-slavery efforts quarterly, ensuring continuous oversight. The Modern Slavery Working Group conducts regular audits and engages closely with procurement, legal, and operational teams to ensure our anti-slavery policies are effectively implemented and regularly updated.

## Our Business and Supply Chains

Underground Construction Alliance (UCA) is an Australian company specializing in integrated project delivery for multidisciplinary underground construction projects. Since its establishment in December 2018, UCA has completed projects worth hundreds of millions of dollars, particularly within the mining and civil construction sectors across Australia.

We collaborate closely with our alliance partners—AWCON, M2P Engineering, and PHE—who provide expertise in civil construction, structural mechanical & piping, and electrical & instrumentation, respectively. UCA delivers comprehensive project solutions, from underground crushing and ore handling to ventilation systems and mine services. Our reputation for efficient project management, high safety standards, and strong local content integration highlights our commitment to using local employees and suppliers whenever possible.

UCA is ISO certified (ISO 9001, ISO 14001, and ISO 45001), underscoring our dedication to quality, environmental responsibility, and occupational health and safety. Our capability to manage large-scale underground construction projects across multiple disciplines solidifies our position as an industry leader.

We prioritize building relationships based on trust and integrity with our suppliers. Our supplier selection process includes thorough due diligence, focusing on legal compliance, health, safety, environmental standards, and overall reputation. While no allegations of human trafficking or slavery have been raised against any of our suppliers, we are prepared to take immediate action if such issues arise, including reporting to relevant authorities.

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## Risk assessment

In the past year, UCA conducted a comprehensive risk assessment of our supply chain. This process considered several factors, including:

- Country risk profiles based on the Global Slavery Index;
- The nature of services provided by suppliers;
- The presence of vulnerable demographic groups;
- News reports and insights from labor and human rights organizations.

This risk assessment process is reviewed annually to ensure we remain responsive to emerging risks. In the underground construction and mining industries, we are particularly aware of vulnerabilities associated with the sourcing of materials and subcontracted labor.

This assessment informs our response and the risk control measures we implement.

## Policies

UCA has established the following policies to prevent and identify slavery and human trafficking in our operations:

- Whistleblowing Policy: We encourage employees, customers, and suppliers to report any concerns about slavery or human trafficking without fear of retaliation. A confidential helpline is available to protect the identities of whistleblowers.
- Code of Conduct: Our code outlines expected behaviors for employees representing UCA, with a strong emphasis on ethical practices and compliance with international standards, particularly in supply chain management.
- Purchasing Code: We have updated our purchasing code and supplier contracts to explicitly prohibit modern slavery and human trafficking.

## Grievance Mechanisms

UCA has implemented a confidential grievance mechanism accessible to all employees and suppliers. This system allows individuals to report modern slavery concerns anonymously, ensuring they are protected from retaliation.

## Supplier Due Diligence

We conduct thorough due diligence on all new suppliers and regularly assess existing ones. Our process includes:

- Evaluating risks associated with the services provided;
- Auditing suppliers for compliance with health, safety, and labor standards;
- Requiring corrective actions for substandard employment practices;
- Sanctioning non-compliant suppliers, including potential termination of contracts.

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We require all suppliers to certify that:

- They do not engage in forced, compulsory, or slave labor;
- Their employees work voluntarily and can terminate employment freely;
- Employment contracts contain reasonable notice periods;
- They do not withhold wages or require employees to post deposits;
- They do not confiscate passports or work permits as a condition of employment.

## Remediation Process

If modern slavery is identified within our supply chain, UCA commits to working with the relevant authorities and organizations to ensure the individuals affected receive appropriate support. Suppliers that fail to rectify violations within a designated timeframe will face immediate termination of their contracts and be reported to the relevant authorities.

## Awareness

To raise awareness of modern slavery, UCA has launched internal campaigns, including posters displayed across our facilities and company-wide emails. These communications emphasize:

- Our commitment to combating modern slavery;
- Indicators of potential slavery or human trafficking cases;
- How to report concerns about modern slavery.

## Training

In addition to our awareness efforts, UCA has introduced a mandatory e-learning course for all employees and suppliers. This course covers:

- Different forms of modern slavery;
- The scale of the issue and its relevance to our operations;
- How to identify signs of slavery and human trafficking;
- Reporting protocols for suspected cases;
- Guidance for suppliers on implementing anti-slavery measures;
- Support available for victims of slavery;
- Consequences for suppliers failing to comply with anti-slavery policies.

These awareness campaigns are refreshed annually to ensure continued engagement. In addition, our mandatory e-learning course is updated regularly to reflect the latest developments in anti-slavery practices.

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## Measuring Our Performance

To ensure accountability, UCA has established key performance indicators (KPIs) to measure the effectiveness of our efforts to combat modern slavery. These include:

- The number of employees who have completed mandatory training;
- The number of suppliers who have completed our ethics questionnaire;
- The extent to which our suppliers have implemented similar awareness and training programs;
- Reports from employees demonstrating heightened awareness of ethical issues;
- Insights from our cross-functional Human Rights team, which reviews our progress on modern slavery and human trafficking prevention.

## Continuous Improvement

UCA is committed to continually reviewing and enhancing our policies to address modern slavery risks. We will perform an annual audit of our supply chain, review our training programs, and seek feedback from our suppliers and employees to refine our approach.

Going forward, UCA plans to expand our supply chain audits to include unannounced visits, and we will set specific targets for the number of suppliers that must implement robust anti-slavery programs by the next reporting period

This statement covers the reporting period 1<sup>st</sup> July 2023 to 30<sup>th</sup> June 2024 and has been approved by the board of Underground Construction Alliance Pty Ltd.



[Signature]

Mark Hogan  
UCA Executive Chairman

2/11/2024

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