



Ace Contractors Group Pty Ltd (ACG) - Joint Modern Slavery Statement (MSS)

Modern Slavery Act 2018 (Cth) (the Act)

Financial Year ending 30 June 2023

In the spirit of reconciliation, ACG acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea and community. We pay our respect to their elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

The Global Slavery Index 2018 estimates that on any given day in 2016, there were 15,000 people living in conditions of modern slavery in Australia. Our industry, construction and civil infrastructure, is considered high risk. Particularly labour chain risks through labour hire or subcontracting. As well as risks from supplies and minerals sourced, particularly but not exclusively, from overseas.

Our business has its people and its vendors at its core. We have always been focused on their safety and our environment. Our human rights journey has begun. We aim to take advantage of the same established and verified company systems, assurance processes and people. We acknowledge this is not just a moral responsibility, instead Modern Slavery is considered a risk to our shareholders and stakeholders. Our shareholders and stakeholders are now turning their minds to human rights as an issue of compliance and thus commercial competitiveness. Modern Slavery is also now a frequent element of tendering.

This MSS is focused on advancement and sophistication in our approach to identifying and controlling risks. This MSS will summarily outline our structure, operations, supply chains, risks, actions and measurements. We have built on matters of culture and awareness to now present advanced and sophisticated approaches to achieve the intention of the Act.

For the purposes of this Modern Slavery Statement (MSS), we will use the definition and our understanding of Modern Slavery contained in the Act and do not seek to expand on it nor the concepts of direct, indirect, causing or contributing to it.

A. Section 14 (1) of the Act

Entity giving the statement: Ace Contractors Group Pty Ltd (ABN 30 007 256 242)

Reporting Entities:

- 1) Ace Contractors Group Pty Ltd (ABN 30 007 256 242)
- 2) Ace Infrastructure Pty Ltd (ABN 22 131 093 493)
- 3) Ace Civil Services Pty Ltd (ABN 16 131 093 466)
- 4) Ace Environmental Services Pty Ltd (ABN 18 131 093 475)
- 5) Ace Landscape Services Pty Ltd (ABN 39 131 093 500)
- 6) Ace Water Services Pty Ltd (ABN 23 148 867 878)
- 7) Ace Electrical Infrastructure Pty Ltd (ABN 87 159 022 143)
- 8) Conso Australia Pty Ltd (ABN 19 635 395 916)
- 9) Bloom Enterprises VIC Pty Ltd (ABN 16 653 570 677)

Reporting period: 1 July 2022 to 30 June 2023

B. Section 14 (2) of the Act

Reporting Entities:

- 1) Ace Contractors Group Pty Ltd (ABN 30 007 256 242) (ACG)
 - a) Structure: ACG is a corporation incorporated pursuant to law. It is part of the larger group (approx. 350 employees) of entities but controls all those entities. These entities are named in Section A above. ACG is owned by private shareholders who make the Executive Management. These groups make decisions for and on behalf of ACG and its entities. ACG and all its entities are controlled, registered, operate and addressed in Australia.
 - b) Operations: ACG is the flagship company. It is mostly responsible for employing staff not employed directly with other entities, providing optics consistent with ACG's "diverse services portfolio", and providing financial guarantees to clients. It is entirely in control of all entities and its Directors and Officers are responsible for, manage and operate the businesses of the entities as Directors and Officers in the same regard. ACG also sets the policies and procedures followed by all other entities and employs subject matter experts in IT, Legal, Commercial, Systems, Safety, Finance and Human Resources to support all entities.
 - c) Supply Chains: ACG enters into some contracts and supply agreements for example employment and employment services, cleaning services and office leasing/supplies. Despite its control of all entities, we will choose to describe the supply chains of each subsidiary as it specifically relates to that business rather than describing them here.
 - d) Risks of Modern Slavery: A theme contained in our 2022 MSS was that ACG's wide array of suppliers and subcontractors designed to facilitate our diverse services portfolio was a risk of Modern Slavery. This risk remains for us and our industry.
 - e) Actions Taken (assess and address): ACG has updated its subcontracts and purchase orders. One goal was to ensure subcontractor/supplier compliance with all Legislative Requirements (including the Act). ACG also updated its employment agreements with a similar goal as well as maintaining an express reference to Modern Slavery (and Whistleblower protection which we think is relevant).

ACG also maintained a modern slavery team comprising of legal, systems, commercial, business development and operations staff. This team is responsible for overseeing and assessing Modern Slavery risks, responding to them, as well as advocating for this issue to be considered by all ACG entities.

DocuSign (an electronic signature platform) has been rolled out across the ACG. DocuSign has features which are consistent with the intention of the Act. For example, customers and vendors can quickly access and sign legally binding documents from practically any device in 43 languages. DocuSign ensures signers are who they say they are with integrated authentication options. ACG also have the option to collect payment information and other key data needed to complete a transaction.

Further, ACG will get instant visibility into the status of each agreement. We will know exactly who signed, when, and where, keeping the process moving forward. We can save each executed agreement in the DocuSign cloud for access to a complete digital record at any time, or transfer to our own systems to comply with company policies (including Modern Slavery).

Social Procurement and Enterprise businesses within ACG remain a priority for ACG.

- f) **How Effectiveness Was Assessed:** ACG, as the Reporting Entity, is responsible for the assessment of effectiveness of actions for all the entities it controls. It is doing this through the staff employed by ACG who have oversight, reporting lines and responsibility for relevant areas in law, commerce, systems, business development and operations. Effectiveness was also assessed by regular reviews by legal staff including by noting risks and actions for this report. A notable advancement and sophistication in the matters (and controls) addressed in this MSS is observed.
- g) **Other Relevant Information:**
- ACG operates a Safety Management System which complies with the requirements of ISO45001:2018 for the accompanying scope.
 - ACG operates a Quality Management System which complies with the requirements of ISO 9001:2015 for the accompanying scope.
 - ACG operates an Environmental Management System which complies with the requirements of ISO 14001:2015 for the accompanying scope.
 - In 2012, ACG's Safety Management System was certified by the Federal Safety Commissioner.
 - We operate a robust policy for disclosures of misconduct or improper state of affairs, in compliance with strict and enforceable enhanced Whistleblower protections under the *Corporations Act 2001* (Cth).
 - All entities comply with Industrial Relations Laws.
- h) **Consultation Process with Reporting Entities:** Consultation from ACG has occurred during the drafting of this MSS. Supply chains and Operations of all entities are well understood by ACG and therefore its oversight staff. Any actions taken were communicated with relevant reporting entity heads (General Manager). Further, to level out any inconsistencies in consultation, ACG's Executive Team which consists of all Directors, Officers and entity heads (General Manager) were made aware of the requirement for this MSS and indeed reviewed the MSS in its final form. Feedback was allowed to be received and adopted/implemented where relevant.

- a) Structure: AI is a corporation incorporated pursuant to law. It is part of a larger group of entities as a subsidiary to ACG. AI is registered, addressed and operates in Australia.
 - b) Operations: AI is predominantly engaged directly by major statutory authorities such as, state & local government and Defence to perform design and construction services for projects such as roads, bridges, shared paths, public open spaces, and bus/tram/rail infrastructure.
 - c) Supply Chains: AI's supply chain is broad. It includes products supplied such as steel, asphalt and cement, services from subcontractors such as labour hire and specialist contractors such as non-destructive digging who perform part of the contract works. For the purposes of this MSS, we do not have a detailed understanding, including geographically of our Supply Chain beyond the direct parties that contract with AI.
 - d) Risks of Modern Slavery: Based on the Risk Assessment performed by ACG on behalf of and including AI's operation and supplies, the possible overseas produced supplies which may exist in our Supply Chain and labour hire which exists in our Operations, are considered Risks. For labour hire this could include, unskilled, temporary workers, pressured due to Visa status. We do not have a detailed understanding of whether the risk is low or high. The pressures of 2023 such as supply shortages, high demand (post COVID), inflation, increased cost of fuel has increased the risks of modern slavery.
 - e) Actions Taken: As a controlled entity of ACG, the actions taken on behalf of ACG apply to AI. Further, AI entered into an innovative and collaborative design and construct contract with the State Government. This arrangement included a detailed design development and planning stage which increased subcontractor and supply chain visibility. The agreement is also on an "open book" basis which adds another layer of oversight and control to operation and supply chain spends, which should reduce the risk of modern slavery.
- 3) Ace Civil Services Pty Ltd (ABN 16 131 093 466) (ACS)
- a) Structure: ACS is a corporation incorporated pursuant to law. It is part of the larger group of entities as a subsidiary to ACG. ACS is registered, addressed and operates in Australia.
 - b) Operations: ACS's core business is performing a variety of subcontract packages to Tier 1 and 2 construction companies on both commercial building and major infrastructure projects within the Energy, Retail, Health, Education, Transport, Recreation and Public Safety sector. Scope of operations typically includes earthworks, pavements, structural concrete, retaining walls, landscaping and inground services.
 - c) Supply Chains: ACS's supply chain includes specialist subcontractors, supplies such as asphalt, concrete, infrastructure materials like piping, timber and crushed rock as well as labour hire. The Other Relevant Information section contained in this MSS also applies to ACS.
 - d) Risks of Modern Slavery: Based on the Risk Assessment performed by ACG on behalf and including ACS's operation and supplies, the procurement of overseas supplies and labour hire are considered Risks. For labour hire this could include, unskilled, temporary workers, pressured due to Visa status. The pressures of 2023 such as supply shortages, high demand (post COVID), inflation, increased cost of fuel has increased the risks of modern slavery.

e) Actions Taken: As a controlled entity of ACG, the actions taken on behalf of ACG apply to ACS. No other specific action was taken during this Reporting Period.

4) Ace Environmental Services Pty Ltd (ABN 18 131 093 475) (AES)

a) Structure: AES is a corporation incorporated pursuant to law. It is part of a larger group of entities as a subsidiary to ACG. AES is registered, addressed and operates in Australia.

b) Operations: AES currently has no active operations.

c) Supply Chain: NA

d) Risks of Modern Slavery: NA

e) Action Taken: NA

5) Ace Landscape Services Pty Ltd (ABN 39 131 093 500) (ALS)

a) Structure: ALS is a corporation incorporated pursuant to law. It is part of a larger group of entities as a subsidiary to ACG. ALS is registered, addressed and operates in Australia.

b) Operations: ALS designs, constructs and maintains major landscape projects, including commercial developments, municipal parks and gardens, sporting facilities, streetscapes, plazas and landscape works associated with public infrastructure. It and ACS's model, indeed ACG's model is to work in conjunction with ACG entities to offer a "one stop shop". ALS specialises in high quality hard and soft landscaping, in house irrigation service, construction and maintenance of including golf courses, wetlands, bush-land reserves, community parks and gardens, sporting facilities, municipal streetscapes and plazas, and landscape works associated with major buildings or facilities.

c) Supply Chains: ALS's supply chain includes specialist subcontractors, like designers and architects, irrigators, planters and pavers. It also procures supplies such as piping, timber, retaining walls, soil and crushed rock. The Other Relevant Information section contained in this MSS also applies to ALS.

d) Risks of Modern Slavery: Based on the Risk Assessment performed by ACG on behalf and including ALS operation and supplies, ALS engages an overseas 3rd party to perform online estimating services for ALS. The pressures of 2023 such as supply shortages, high demand (post COVID), inflation, increased cost of fuel has increased the risks of modern slavery.

e) Actions Taken: ALS Management consulted with legal counsel on the overseas service provider issue. Legal counsel assessed the risk as low (including because the arraignment has been in place for some time now) and so proceeded with numerous risk controls:

- i. Notice period to terminate the contract;
- ii. General oversight and management was performed by ALS not overseas;
- iii. Payment is made before work is complete;
- iv. ALS agreed to monitor workload to ensure no obvious over working; and
- v. The 3rd party was large and reputable.

As a controlled entity of ACG, the broader actions taken by ACG also applied to ALS and will continue to apply as ACG plans to increase Actions Taken.

- 6) Ace Water Services Pty Ltd (ABN 23 148 867 878) (AWS)
- a) Structure: AWS is a corporation incorporated pursuant to law. It is part of a larger group of entities as a subsidiary to ACG. AWS is registered, addressed and operates in Australia.
 - b) Operations: AWS designs, manufacture and constructs water and wastewater infrastructure for water authorities including on major water infrastructure projects. It is complex work including pump stations, irrigation infrastructure, water and sewerage treatment facilities, water storage, channels, channel regulators, weirs, offtakes and meters.
 - c) Supply Chain: AWS's supply chain includes electrical products like wiring, conduits, water systems and pits. AWS also subcontracts with specialists for performing work relating to water infrastructure, excavation, and channelling/irrigation. The Other Relevant Information section contained in this MSS also applies to AWS.
 - d) Risks of Modern Slavery: Based on the Risk Assessment performed by ACG on behalf and including AWS's operation and supplies, the procurement of electrical products is considered a Risks. Particularly, any of the products procured or manufactured overseas. In some respect, many minerals required in the making of metals or other equipment is at risk of having been gained in a manner not consistent with the principles of eradicating modern slavery. However, no specific risk was identified being caused by or as a result of AWS, noting, this supply chain may be long and complex. The pressures of 2023 such as supply shortages, high demand (post COVID), inflation, increased cost of fuel has increased the risks of modern slavery.
 - e) Actions Taken: As a controlled entity of ACG, the actions taken on behalf of ACG apply to AWS. No other specific action was taken during this Reporting Period.
- 7) Conso Australia Pty Ltd (ABN 19 635 395 916) (Con)
- a) Structure: Con is a corporation incorporated pursuant to law. It is part of a larger group of entities as a subsidiary to ACG. AEI is registered, addressed and operates in Australia.
 - b) Operations: Con maintains and develops computer software for Ace's internal management system. This requires skilled software knowledge including how to develop to a new cloud based operating system.
 - c) Supply chains: Con's supply chain includes some minimal use of computer hardware parts but is otherwise a knowledge based operation.
 - d) Risks of Modern Slavery: Based on the Risk Assessment performed by ACG on behalf and including Cons's operation and supplies, the procurement of computer parts is considered a Risk. Particularly, any of the material procured or manufactured overseas. However, no specific risk was identified being caused by or as a result of Con, noting, this supply chain may be long and complex. The pressures of 2023 such as supply shortages, high demand (post COVID), inflation, increased cost of fuel has increased the risks of modern slavery.
 - e) Actions Taken: As a controlled entity of ACG, the actions taken on behalf of ACG apply to Con. No other specific action was taken during this Reporting Period.

- 8) Bloom Enterprises VIC Pty Ltd (ABN 16 653 570 677) (Blo)
- a) Structure: BLO is a corporation incorporated pursuant to law. It is part of a larger group of entities as a subsidiary to ACG. BLO is registered, addressed and operates in Australia.
 - b) Operations: BLO currently has no active operations.
 - c) Supply Chain: BLO has no existing supply chains
 - d) Risks of Modern Slavery: Zero risks at present with no active operations.
 - e) Action Taken: As a controlled entity of ACG, the actions taken on behalf of ACG apply to Con. No other specific action was taken during this Reporting Period.

8 This Modern Slavery Statement has been approved by the relevant principal governing body of ACG (the Directors of ACG). They are in a position, directly or indirectly, to influence or control each reporting entity covered by this Statement. This Statement has been tabled to Directors and Officers of ACG with notice.

9 Signed by responsible member of ACG's (parent company which controls all entities) Directorship:

Signature:



Date: 21/05/2024

Simon Cock
Managing Director
Ace Contractors Group Pty Ltd