



MODERN SLAVERY ACT

OUR STATEMENT FY22/23

Constructing our future on the strength of our past

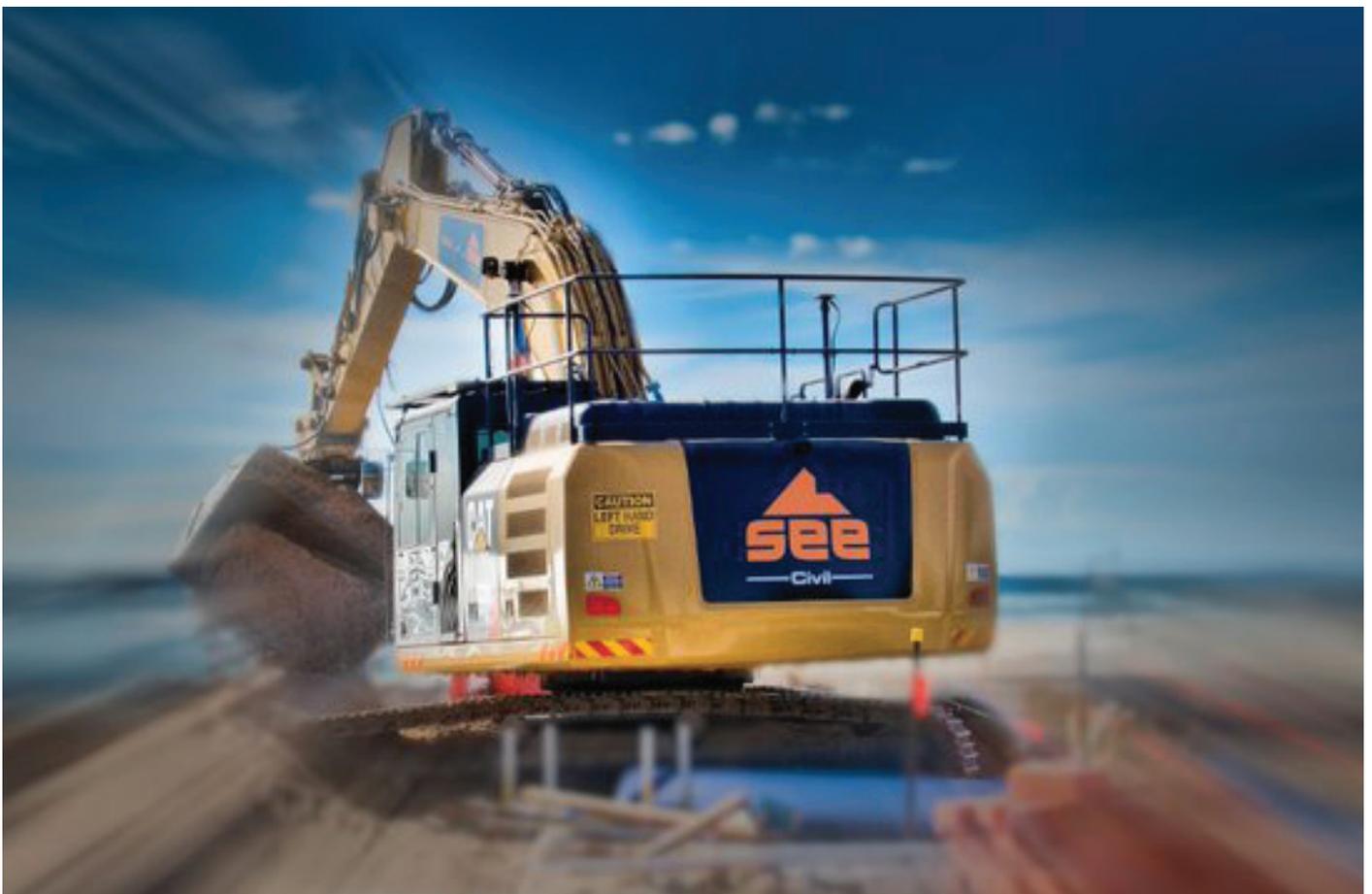




CONTENTS



Introduction	Page 4
Our Structure	Page 5
Our Operations	Pages 6 & 7
Our Supply Chains	Page 9
Understanding Our Modern Slavery Risks	Page 10
Risk Mitigation Actions	Page 11
Assessing Our Effectiveness	Page 12
Actions Taken in the last 12 Months	Page 13



INTRODUCTION



SEE Group Parent Pty Ltd (SEE Group) is an Australian owned, family run business. Our business has more than 35 years success in the civil construction industry. SEE Group (being the ultimate parent company) comprises of a number of entities that contribute to its total annual consolidated revenue as at 30 June 2023.

SEE Group prides itself in its family-oriented culture which is reflected through “The SEE Way”.

SEE Group recognises that Modern slavery is an ongoing challenge facing all businesses, including ours. We are committed to progressing our approach to managing modern slavery risks and continue to work toward the ultimate elimination of modern slavery.

This statement has been prepared in consultation with each entity and has been approved by SEE Group’s Board. The process of consultation involved engagement with the Group’s Executive Leadership Team, our Audit and Risk Committee, our Sustainability Committee and input from the various relevant internal stakeholder teams including Finance, Commercial and Legal, and People and Culture.

This statement was approved by the SEE Group Parent Pty Ltd Board of Directors on 20th December 2023.

A handwritten signature in black ink, appearing to read "S Turner", with a small asterisk to the right.

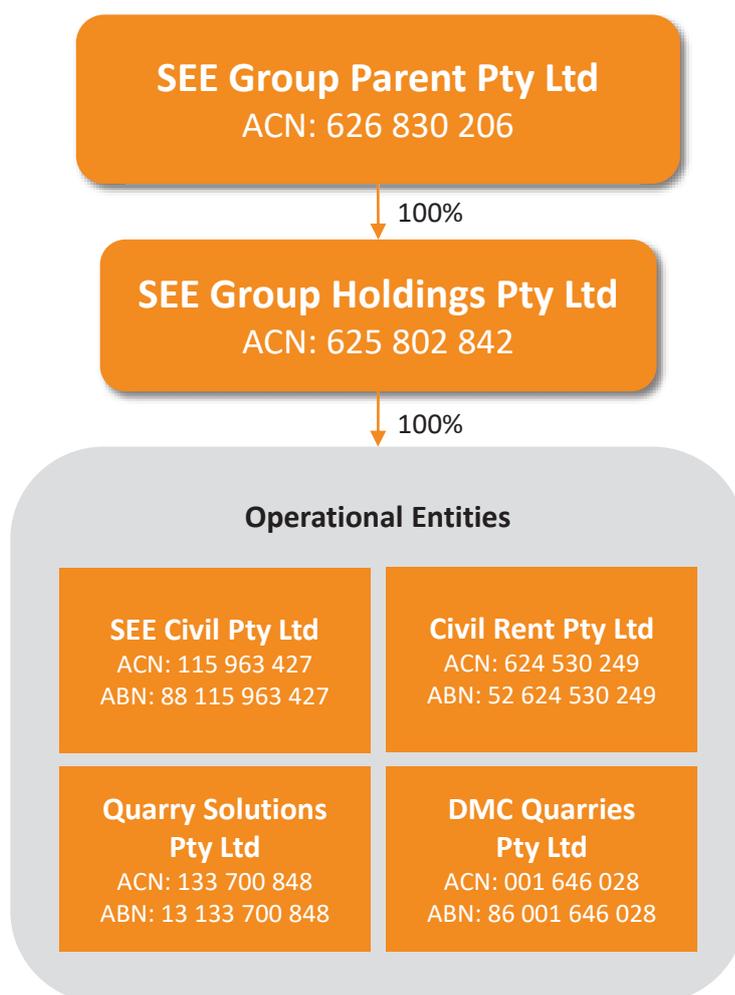
Steve Turner
Managing Director
20th December 2023



OUR STRUCTURE



SEE Group operates as a wholly Australian owned corporate group with SEE Group Parent Pty Ltd as its parent company. Our reporting entities include SEE Group Holdings Pty Ltd and SEE Civil Pty Ltd. SEE Group Holdings and SEE Group Parent incorporate all of the Group's operating activities, which include Urban, Infrastructure and Resources civil infrastructure, wet and dry plant hire and quarrying operations. SEE Civil delivers all civil works and is the group's largest operating and employing entity.



OUR OPERATIONS



543

PROJECTS
COMPLETED

\$250m

CURRENT
PORTFOLIO

343

TEAM
MEMBERS

360

HEAVY PLANT
& ASSETS

OUR OPERATIONS



We comprise of two distinct workforces – our direct workforce, comprising our employees, and our indirect workforce, comprising our labour hire workforce. Approximately 343 team members are employed wholly within Australia and are based in Queensland and New South Wales. We have visibility and control over the terms of employment and working conditions of our employees.



Our Employees are covered by two (2) enterprise agreements and eight (8) industrial instruments. We have deemed the risk of modern slavery in our direct workforce as low. We have strong policies and procedures, awareness, and training, as well as grievance reporting so our employees can be the eyes and ears of our broader networks. We communicate our modern slavery expectations and commitments via the following policies:

- Code of Conduct
- Anti-Bribery and Anti-Corruption
- Equal Opportunity
- Modern Slavery
- Whistleblower
- Workplace Health and Safety

These policies set out our expectations on how we expect our employees to behave, treat others, our commitment to obeying laws and regulations, physical and psychological safety in the workplace, and channels and support to communicate breaches of these policies.

We monitor compliance in our direct workforce by verifying the right to work in Australia, age and qualifications of new employees on commencement, providing initial and ongoing training and awareness of all policies, and we regularly review pay calculations in accordance with the relevant award or instrument.

Another portion of our workforce is filled by labour hire workers, who fulfill various roles across our project sites. We have well-established, long-standing arrangements with several key organisations who provide additional staff to meet our operational requirements. All of our labour hire is employed through Australian organisations that operate in Queensland and NSW.

Whilst we assess our modern slavery risk for this workforce is also low, we acknowledge we have less visibility and control over their employment terms and conditions. To mitigate this risk we review actual pay rates and on-costs that make up the charge rate paid to our suppliers, as well as ensuring all Queensland suppliers hold a labour hire licence, as required under section 10 of the Labour Hire Licensing Act 2017 (Qld).

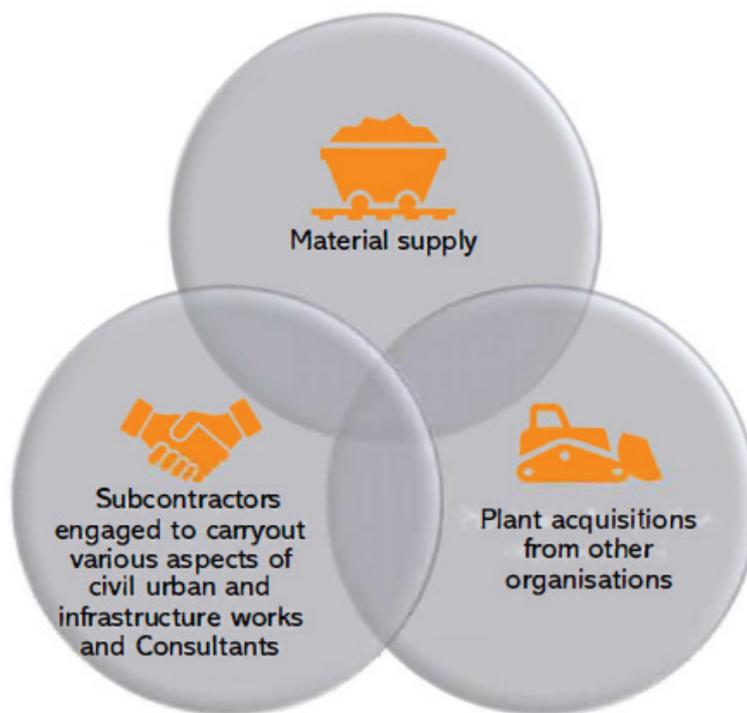


OUR SUPPLY CHAINS

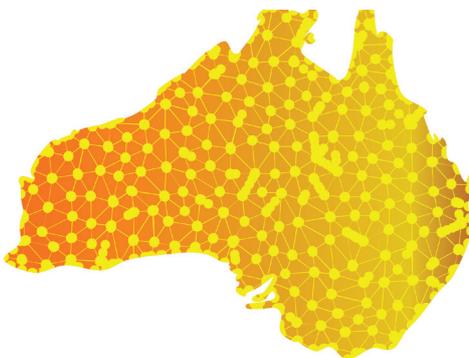


SEE Group seeks to engage with suppliers who invoke “The SEE Way” with ethical and sustainable practices relating to human rights and the environment. We have an emphasis on sourcing local supplies where a project is based and seek to encourage and support local economic prosperity.

Ultimately, we seek compliance with modern slavery legislation through due diligence of suppliers and consultants terms and conditions from the commencement of any commercial arrangement. It is everyone’s role in SEE Group to identify modern slavery risks and report any concerns relating to modern slavery.



Our largest procurement in FY23 consisted of fuels and lubricants, asphalt, concrete and aggregates, pipeline infrastructure, plant and equipment and labour hire. We engaged 1,433 suppliers who were almost exclusively based in Australia, with a few select vendors located overseas. Procurement sourced outside of Australia included China, Finland, Germany, Italy, Japan, New Zealand, Singapore, South Korea, Sweden, and the USA. We acknowledge that each of our suppliers also have their own supply chains which highlights the importance and complexity around mitigating modern slavery risks.



UNDERSTANDING OUR MODERN SLAVERY RISKS



'Modern Slavery' describes situations of serious exploitation in Australia or abroad such as human, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour. It does not include substandard working conditions or underpayment of workers. These practices are also illegal and harmful and may be present in situations of modern slavery.

The United Nations Guiding Principles of Business and Human Rights 2011 underpins the core principles of the Modern Slavery Act 2018 (Cth).

SEE Group places respect for Human Rights at the forefront of its operations and supply chains and aims to embed practices that support these principles throughout the business. Consequently, SEE Group endeavours to engage suppliers with similar ethics, values and practices pertaining to Human Rights.

SEE Group considers identifying Modern Slavery risks and practices of paramount importance to maintain safe, lawful and ethical business operations.

The risks associated to various suppliers is specific to the type of supply being engaged and many factors contribute to this e.g., location, type of supplier, company size.

SEE Group has assessed the risk of modern slavery within the Group's operations as low impact. SEE Group has a comprehensive system of checks and procedures to ensure compliance with all legislative requirement across the workforce and suppliers it engages with.

SEE Group has identified the following supply chain services that may represent a heightened risk to modern slavery, being:

- Various purchase of software and information technology services from overseas companies in the USA & Japan
- Uniform and PPE
- Indirect labour supply chain - labour engaged in making materials and products and lack of operational control in multi-tiered manufacturing sub-supply chains for pre-assembly components
- Plant and equipment sources from Japan

RISK MITIGATION ACTIONS



We endeavour to engage with local services and products. This is part of our ongoing commitment to local communities to where our projects are located, to inject financial growth in that community. We educate new suppliers on modern slavery risks through their onboarding pack, and have made a commitment to commence obtaining modern slavery statements from our suppliers not required to produce their own. Raising awareness and setting our expectations on these risks will build our supplier capability and ensures our supply chain understands our commitment to modern slavery. Other policies that mitigate modern slavery risks include the sustainability policy and our purchasing policy.

We have a particular focus on employing the skills of indigenous persons and businesses as part of the projects we deliver.

The below diagram demonstrates SEE Groups current practices of ensuring Human Rights are at the forefront of what we do:



REMEDIATION

If the ARC receive a notice of a modern slavery incident it will meet to prepare a report for the SEE Group Board of Directors including potential remediation strategies. The main focus is to review and improve existing policies and procedures and provide further training to employees as well as further auditing and ceasing contracts with suppliers

ASSESSING OUR EFFECTIVENESS



- SEE Group actively engages with its suppliers to determine whether they are compliant with our standards. If an area of concern is identified with a supplier, we proactively engage in positive dialogue in order to educate and then remedy any failure of our policies and Code of Conduct.
- SEE Group's actions of a comprehensive onboarding process and contractual terms requiring suppliers to comply with legislative obligations including those relevant to eliminating modern slavery and SEE's policies and procedures appear to have been effective in minimising the risk of modern slavery within the main areas of SEE Group's direct supply chain.
- SEE Group's Audit and Risk Committee supports the Board to monitor the financial performance and disclosures of SEE Group, as well as compliance with all applicable laws and regulations, including our modern slavery reporting. The Audit and Risk Committee also oversees the framework for, and the reporting of, risks including enterprise, project procurement and delivery risks. The project risks include those relating to modern slavery and other procurement activities.
- The Group's modern slavery risk management approach is approved annually and by the Board of Directors.
- We have identified no breaches of our policies this year.

ACTIONS TAKEN IN THE LAST 12 MONTHS



SEE Group now include in their contracts with suppliers additional obligations pertaining to the modern slavery legislation. This includes a requirement by the supplier to sign a Statutory Declaration confirming that they currently comply and will continue to comply with the modern slavery legislation and that their suppliers to whom they engage are, to the best of their knowledge, also compliant with this legislation.

The Audit and Risk Committee are continuing to review existing policies and training to provide for general modern slavery risk and processes to ensure SEE Group and it's suppliers continue to manage the risks associated with modern slavery.

More due diligence checks have been put in place at the time of procurement to audit new suppliers and subcontractor so as to ensure that they re compliant with the Modern Slavery Legislation.

A Sustainability Committee has been formed to review the effectiveness of initiatives so as to strengthen supply chain transparency and traceability, thereby reducing the risk of modern slavery.

The Audit and Risk Committee will continue to meet regularly to monitor and mitigate any potential modern slavery risks with suppliers and report to the Managing Director of any concerns that may arise.





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