

# **CTC Precast Pty Ltd and Precast Civil Industries Pty Ltd 2019-20 Modern Slavery Statement**

The reporting entity is CTC Precast Pty Ltd ACN: 614 966 059 (**CTC**), of Level 13,664 Collins Street Docklands, Vic. This statement sets out the actions CTC and its controlled entity has taken to address the risks of modern slavery in its business operations and supply chains during the financial year commencing 1 July 2019 and ending 30 June 2020 (**2019-20 Financial Year**)

## **Our Business Operations and Structure**

CTC is a privately owned proprietary limited company, based in Australia that wholly- owns and controls its subsidiary Precast Civil Industries Pty Ltd (**Precast**).

CTC does not actively trade, with all trading activities conducted within Precast.

Given the closely held relationship of the entities, it was deemed appropriate to prepare a joint statement, with the emphasis on Precast's activities.

Precast is an Australian manufacturer of precast concrete products and supplier of a broad range of associated materials, equipment and tools into the civil infrastructure/ building constructions sectors across Australia and Pacific regions, trading as Civilmart ([www.civilmart.com.au](http://www.civilmart.com.au)), and associated brands.

Our product range is made up of products such as reinforced concrete pipes, box culverts, pits, headwalls, gully units and tanks. Supported by an extensive range of ductile iron covers and frame, galvanized mild steel grates and frames and a variety of aluminum, brass and FRP ancillary products.

Precast has 13 manufacturing sites across Queensland, New South Wales, Victoria and South Australia that employs in excess of 400 staff and subcontractors domestically.

## **Supply Chains**

Precast sources components for its manufactured products and a large range of resale items, from both within Australia and overseas, with our primary overseas supplies coming from China and India.

Our global supply chain made up of many 100's of suppliers, with the greater majority of our main suppliers being part of long term, well established business relationships. However, some procurement for both goods and services is conducted on an ad hoc or on the spot basis, with most of these transactions being conducted locally.

Precast is currently auditing our supplier list against published industry and geographic modern slavery risk indicators to categorise them into low, medium, and high risk.

We anticipate the majority of our suppliers will fall into the low-risk category, with the potential for our overseas suppliers to fall into the medium to high-risk category.

## **Our Commitment**

Precast is committed to taking all reasonable steps to ensure that there is no modern slavery in our supply chains or in any part of our business and acknowledge our role and responsibility in seeking to safeguard human rights through ethical and sustainable business practices.

As a demonstration of that commitment Precast has developed a Modern Slavery Policy. The Policy outlines that Precast is committed to eliminating modern slavery throughout our business and supply chains. We expect the same standards from our suppliers, contractors, and business partners.

These objectives are an integral part of Precast's core values of corporate responsibilities, leadership, respect, social responsibility, and accountability.

We have acquainted all of our overseas suppliers with our Policy on Modern Slavery and requested that they complete our zero tolerance to Modern Slavery Declaration, which sets out our expectations for suppliers within our supply chain to conduct themselves and their business dealings in an ethical and equitable way.

## **Our Policy**

Precast's Modern Slavery policy has been tool-boxed and explained to our employees and published on the internal Intranet.

The policy details the how Precast intends to address modern slavery across our business and supply chains.

We expect that same standard from our contractors, suppliers- both international and local, and other business partners.

These objectives are a non-negotiable part of the Precast business strategy to achieve our goals for corporate responsibility, statutory compliance and demonstrated due diligence.

The actions outlined in the Policy are a shared responsibility. All stakeholders are responsible for aligning all business and procurement activities, to ensure we are doing everything we can to eliminate the presence of modern slavery within our business and/or supply chains.

## **Moving Forward**

We understand that this process is going to be an ongoing journey of increasing education and investigation for both our Precast staff and our business partners over time, and with that in mind, we are committed to continuous improvement in our methods for identifying modern slavery risks and its mitigations.

Actions planned for the 2020-2021 year are:

- Review by way of visitation and inspection (spot checks) our supplier's factories overseas with regards to safety, working conditions, compliance to local awards, compliance to the UN Modern Day Slavery Act, and quality control. (dependent on travel restrictions)

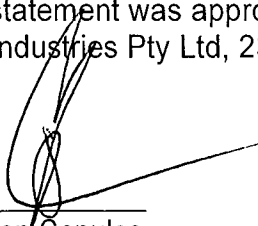
- Undertake further due diligence and risk assessment to assess suppliers where there could be the potential for breaches or abuses of fundamental human rights by way of a new created Risk Assessment Questionnaire, to help identify potential breaches to the Act.
- Issue letters of request for further information to all high and medium risk suppliers identified in our review. These letters will confirm Precast's position on Modern Slavery and request information on our supplier's processes, in particular their policies on Modern Slavery and the ways they are identifying and addressing these issues. Ensuring they have appropriate policies and protocols that align with those of Precast regarding human rights, fair pay, forced labour, health and safety.
- We will also introduce a new supplier onboarding screening process requiring our business units to complete a comprehensive Supplier Survey. Where red flags are identified, suppliers will have to complete the Risk Assessment Questionnaire, detailing what steps they are taking within their operation to address modern slavery risks within their own business and respective supply chains. These completed Questionnaires will be assessed by our supply chain managers to ensure we are only dealing with ethical businesses who align themselves with Precast's policies and protocols.
- All future formal Supply Agreements Precast engage in with our supply chain partners will include a clause relating to the Modern Slavery Act and the Precast Modern Slavery Policy.
- All Precast staff will be given ongoing training in identifying and dealing with supply chain risks of modern slavery, in line with the Precast's Modern Slavery Policy.

### **Assessment and Effectiveness**

The effectiveness of the steps taken by Precast to address modern slavery risks in our business operations and supply chains will be better assessed in the next reporting period when Precast has the benefit of reviewing the impact of the processes put in during after the first year of reporting. However, review of each of the processes now put in place will be conducted on an ongoing basis, with the aim to identify and investigate any breaches found, with the intention that a "show cause" letter be given to in breach, asking them to further explain their business processes in the areas of concern.

Those who are unwilling to assist with this process or are unwilling to change processes considered by Precast to not align with our stated policies and protocol, will be dealt with via a disciplinary measure up to and cessation of procurement with that business entity.

This statement was approved by the principal governing body of CTC Precast Pty Ltd, and Precast Civil Industries Pty Ltd, 23 February 2021



Stephen Copulos  
Chairman and Sole Director  
CTC Precast Pty Ltd