

KANE



MODERN SLAVERY STATEMENT FINANCIAL YEAR 2021 – 2022

Kane Constructions Pty Ltd
Kane Constructions (QLD) Pty Ltd
arete Australia

WHO WE ARE

Kane Constructions is a leading mid-tier privately owned commercial construction company. We operate throughout the east coast of Australia with offices in Melbourne, Sydney, Brisbane and Canberra with approximately 500 employees.

We operate across a diverse range of sectors including commercial, healthcare, aged care and retirement living, heritage and restoration, hi-tech research and laboratories, retail, education (tertiary, primary and secondary), community, sports & leisure, hospitality, industrial and defence.



Service Excellence



Continuous Learning



The Right Project Mix



Professional & Hands-On



Owning It



Safe Working Environment



Relationship Building



Teamwork & Collaboration



Entrepreneurial Drive

Our way of doing business underpins everything we do

Trust

- Act with integrity and honesty at all times.
- Deliver on our promises.
- Maintain continuous dialogue with our clients, check-in and welcome feedback.
- Speak up when something is not right.

We Value People

- Safety is at the core of our business and forefront of everything we do. We will always look after each other.
- Actively engage in opportunities to enhance skills and capabilities. Kane will embrace it.
- Respect all people.

Our Unique Culture

- Own it – make the right decisions. We are empowered and supported.
- We balance corporate professionalism with hands-on involvement.

Entrepreneurial Drive

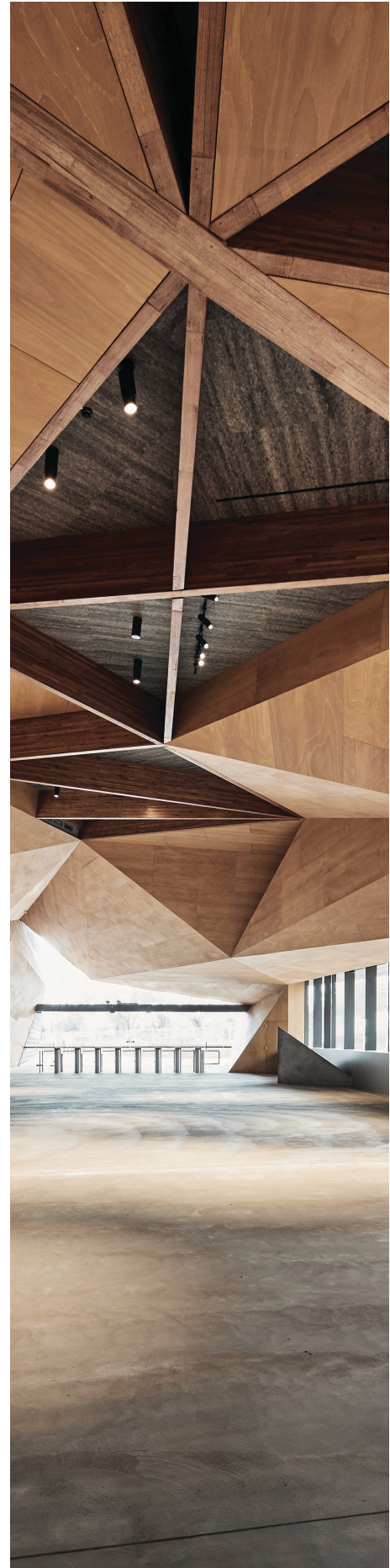
- Hold ourselves and our colleagues accountable.
- Continuously challenge and believe in ourselves.
- Exhibit drive – we are problem solvers first and foremost.
- Be open to learning and change.
- Enjoy winning and celebrate success.
- We will encourage innovation and be open to new ideas in order to further satisfy the needs and expectations of our clients.

Relationships

- Be open and supportive of colleagues – mentor and lead.
- Build our personal brand in the “Kane market”.
- Encourage teamwork, seek shared wins and create a mutual learning environment with all people.
- Develop positive relationships at all levels.

Social

- Consider not only for the economic consequences of your activities, but also for the social and environmental implications.
- Investigate and implement social initiatives where we can make a meaningful difference.



ASSESSING OUR SUPPLY CHAIN

Kane directly employs staff in various roles including Construction Managers, Safety Managers, Project Managers, Site Managers, Contract Administrators, Estimators, Design Managers, and Construction Workers, with all employees engaged under Workplace Agreements, relevant awards, and/or individual agreements.

Our supply chain is complex and extensive, comprising of subcontractors and suppliers delivering materials, equipment, and services. We engage and procure (both directly and indirectly) with many subcontractors, suppliers, and providers to deliver works on our various construction projects nationally. Goods and services are also procured which facilitate the overall operation of our business. This includes Information and communications technology (ICT) equipment; safety and other branded attire such as boots, hard hats, safety glasses, gloves, pants, shirts, hi-vis clothing, and branded merchandise; site and office consumables including stationery and kitchen goods.

Most of our supply chain is based on materials and operations created and run within Australia however, we have identified products and materials originating from various countries including France, Germany, Singapore, USA, Malaysia, China, and United Kingdom.

IDENTIFYING THE RISKS

Kane acknowledge that there are several risk factors within the construction industry contributing to modern slavery globally. We continually assess the following construction specific high-risk items in the context of our own supply chain:

- Countries of origin manufacturing products and sourcing material
- Labour hire & transient labour services provided by migrant workers, transient/casual employees, and low skill workers.
- Lack of grievance procedures (smaller businesses with only a few employees means limited policies and procedures

Despite the complexity of our large and diverse supply chains, Kane are committed to continually improving how we work to meet our moral and ethical obligation to combat and eliminate modern slavery. We expect our subcontractors and suppliers to comply with legislative obligations, and include questions pre award and clauses in contracts specific to identifying and eliminating the risks of modern slavery prior in the supply chain.



ACTIONS TAKEN FY21-22

Kane has continued to broaden the scope of our processes to assist in detecting and mitigating the risks of modern slavery within our supply chain. We have educated our staff, provided guidance to our subcontractors, and workshopped with our clients to further address risks, mitigation methods, and improve education and awareness surrounding modern slavery risks globally. Specific actions are listed below:

FOCUS	FY21 – 22 ACTIONS	STATUS
POLICY & PROCEDURE DEVELOPMENT	<ul style="list-style-type: none"> Annual review of Kane’s Modern Slavery Policy and Procedure Introduction of Code of Conduct 	<ul style="list-style-type: none"> Complete / Ongoing Complete
DUE DILIGENCE	<ul style="list-style-type: none"> Assess questionnaire for improved risk assessment methodology Reviewed responses received from Modern Slavery Specific Post-Tender Interview Questions Introduced Modern Slavery Clauses in Contracts Issued Modern Slavery Questionnaire to subcontractors Modern Slavery Strategy and Review Meetings 	<ul style="list-style-type: none"> Complete / Ongoing Complete Complete Complete Complete / Ongoing
TRAINING AND EDUCATION	<ul style="list-style-type: none"> Internal and external training sessions Distributed Modern Slavery Guidebook to subcontractors Collaboration and workshops with clients on modern slavery awareness, risk mitigation and reporting mechanisms 	<ul style="list-style-type: none"> Complete / Ongoing Complete / Ongoing Complete

DUE DILIGENCE

Our tender and evaluation processes for subcontractors and suppliers continue to assist in recognising potential areas for modern slavery risks within our supply chain. Included in our processes are questions that determine whether businesses we intend to procure goods and services from have policies, standards and codes relating to modern slavery and whether they understand the risk of modern slavery in their supply chains. These responses are recorded and evaluated before commencing business and are embedded into our contracts.

Working with select suppliers, Kane continue to establish how labour and materials are sourced, providing both Kane and suppliers an awareness and a deeper understanding of the issues surrounding modern slavery in our industry.

We expect our supply chain to work in line with our values and comply with all legislative obligations and we do not tolerate any corrupt, illegal or other undesirable conduct. We are committed to fostering a culture where everyone feels safe to speak up on matters of concern. We have not identified any modern slavery concerns within our supply chain and will continue to work with our suppliers and subcontractors to assess and educate them on the risks of modern slavery.

All records from our subcontractors are stored securely on our network and are referred to when assessing our modern slavery risks at least annually.

During the reporting year, Kane implemented our Code of Conduct which outlines the rules we live by and the standards we expect in the conduct of our operations. Our values align with the belief that Modern Slavery is unacceptable and our Code of Conduct promotes behaviour which prevents it. Such values are:

- Doing the right thing
- Treating people with respect, dignity and courtesy
- Holding ourselves and each other accountable
- Professional and collaborative relationships
- Improving social outcomes

TRAINING

Educating our people

Kane's Modern Slavery training course was made available for all staff this reporting year. This training teaches all staff on how to spot any signs of modern slavery throughout the supply chain.

Educating our supply chain

Kane understand the importance of engagement with our supply chain for assessing supply chain risks. We continue to work with and assist our supply chain to implement their own modern slavery policies, procedures and systems to identify and manage their own supply chain risks. Kane will continue to conduct information sessions both with Kane staff internally and our subcontractors and suppliers in order to collectively better understand potential areas of exposure or key risks in operations.

Promoting awareness

Kane have appointed trained employees across the business who can educate, respond to problems, and tackle worker issues or concerns. They are encouraged to raise awareness, and are empowered to drive continual improvement against modern slavery risks.



RELEVANT POLICIES

MODERN SLAVERY POLICY AND PROCEDURE

Kane’s Modern Slavery Policy aims to minimise the risks of modern slavery within our business and within our supply chains. Kane has a coinciding Modern Slavery Procedure to provide further information on what to do if a risk or perceived risk was ever identified.

Kane’s Modern Slavery procedure addresses:

- Our commitment of conducting due diligence to ongoing assessments of our supply chain for identifying vulnerable areas;
- Modern slavery training, how to access it, and who should be involved; and
- Key personnel to contact if modern slavery risks are identified within our supply chain.

WHISTLEBLOWER POLICY

Kane’s Whistleblower Policy is available both internally and to third parties to ensure that any disclosure made about suspected misconduct or an improper state of affairs or circumstances within Kane (or its supply chain) are handled in an objective, secure and confidential manner. Kane’s Whistleblower Protections Officers are aware and have access to Kane’s Modern Slavery Procedure and how/where to escalate any modern slavery matters.

We continue to review and update our policies and procedures in accordance with legislative requirements and updates.

CODE OF CONDUCT

The Kane Constructions Code of Conduct explains the standards the Company expects in the conduct of its operations. The Code supports the Group’s Core Values and our culture, ‘The Kane Way’. The Code has been endorsed by the Board of Directors and applies to every employee of Kane and its subsidiaries.

The image displays three overlapping document thumbnails. The leftmost thumbnail is the 'MODERN SLAVERY POLICY' document, showing sections like 'STATEMENT', 'SCOPE', and 'COMPLIANCE'. The middle thumbnail is the 'WHISTLEBLOWER POLICY' document, featuring a 'STATEMENT', 'SCOPE', 'OBJECTIVE', and a table of Whistleblower Protections Officers (WPOs). The rightmost thumbnail is the 'CODE OF CONDUCT' document, with sections for 'PURPOSE', 'SCOPE', 'CORE VALUES', and 'WORK HEALTH AND SAFETY'. Each document has the Kane logo and 'arete' branding.

LOOKING FORWARD FY22-23

ACTIONS	
POLICY & PROCEDURE DEVELOPMENT	<ul style="list-style-type: none"> ▪ Annual review of Kane’s Modern Slavery Policy ▪ Review internal processes including Kane’s whistle-blower policy, grievance procedure and other reporting mechanisms ▪ Access questionnaire for improved risk assessment methodology
DUE DILIGENCE	<ul style="list-style-type: none"> ▪ Increase the number of subcontractors we work with to educate and gather supply chain information from ▪ Track and measure data from questionnaires and PTIs to continue to identify any risk areas ▪ Issue Modern Slavery Questionnaire to subcontractors ▪ Modern Slavery Strategy and Review Meetings
TRAINING AND EDUCATION	<ul style="list-style-type: none"> ▪ Engagement and collaboration with subcontractors, Kane employees and clients on identifying and responding to modern slavery risks ▪ Internal and external training sessions ▪ Distribute Modern Slavery Guidebook to subcontractors ▪ Collaboration and workshops with clients on modern slavery awareness, risk mitigation and reporting mechanisms ▪ Continued assessment by our Modern Slavery Working Group of the practicality and effectiveness of our modern slavery strategy

APPROVAL

The actions taken to assess and address risks across “Kane” cover both Kane Constructions Pty Ltd (ABN 49 007 354 396) and Kane Constructions (QLD) Pty Ltd (ABN 84 625 633).

Kane Constructions (QLD) Pty Ltd is a wholly owned subsidiary of Kane, run by the same board, using the same systems, policies, and procedures.

In accordance with section 13 of the Modern Slavery Act (Cth) 2018, this statement has been approved by the board of Kane Constructions.



Richard Frisina



Tristan Forster

JOINT MANAGING DIRECTORS