

**Our Solutions.  
Your Success.**



# **MODERN SLAVERY STATEMENT**

*Financial Year 2022-2023*

## ***Our Commitment***

The Modern Slavery Statement by Lucas Total Contract Solutions (Holdings) Pty Ltd (ABN 66 137 901 752) and its controlled entities (**Lucas**) is prepared as required by the *Modern Slavery Act 2018 (Cth)* for the financial year ended 30 June 2023.

Lucas has a zero-tolerance approach to modern slavery and is committed to addressing any modern slavery risks in its operations and supply chains. We have undertaken an initial risk assessment of modern slavery in our operations and supply chains. This statement outlines our progress to date and our current and future commitments.

## ***Our structure, operations and supply chains***

Lucas is a privately owned company founded in 1969 by the Lucas Family and has 7 wholly owned subsidiary entities<sup>1</sup>. Since that time the company has experienced significant growth in business, capacity and capability expanding its core services of mining, energy and civil contracting to include civil maintenance, concrete construction, heavy haulage, bulk material supply and haulage, plant hire, bulk earthworks, logistics, remediate, marine infrastructure and development, mobile camp, survey and plant maintenance.

During the reporting period we undertook many significant projects for some of Australia's leading government, private and public organisations in mining, energy and civil construction and employed an average of 660 employees an increase of 100 employees since the last reporting period.

Predominantly, Lucas contracts and partners with Australian-domiciled companies that provide specialised services in the following areas:

- construction materials and services; and
- heavy Equipment parts and repair services.

From those suppliers we buy:

- concrete;
- quarry products;
- steel;
- heavy machinery parts, accessories and consumables;
- plant and equipment hire services; and
- various construction subcontract services.

We procure necessary consumable items for our business operations. Among the top 14 products that are at high risk for modern slavery, as identified by the Global Slavery Index 2023, there are three products that our company, Lucas, frequently purchases for our supply chain. These products are garments (for uniforms and PPE), electronics such as laptops, tablets, and mobile phones, and coffee. To ensure ethical sourcing, we have evaluated our

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<sup>1</sup> Lucas Total Contract Solutions (NLCG) Pty Ltd (ABN 57 160 650 993), Lucas Total Contract Solutions Pty Ltd (ABN 79 137 901 805), Lucas Total Contract Solutions (Services) Pty Ltd (ABN 82 131 802 054), Lucas Total Contract Solutions (TSM) Pty Ltd (ABN 30 164 314 443), Lucas Total Contract Solutions (Mining Services) Pty Ltd (ABN 51 137 901 690); Lucas Total Contract Solutions (USG) Pty Ltd (ABN 50 623 376 438), Lucas Total Contract Solutions (Mindarie ) Pty Ltd (ABN 99 667 678 453),

primary suppliers for these high-risk categories and scrutinized their modern slavery statements and certifications.

In Financial Year 2022/2023, we had approximately 645 active vendors and suppliers and spent \$120M with direct suppliers. Since its establishment, our core values have been the foundation of the business, reflecting who we are, what we stand for and the legacies we leave. Because of this, we have established long-term relationships with many of our suppliers, the majority of which are in Australia.

Utilising Lucas' Risk Management Program, which is a structured and proactive program to facilitate the early identification of hazards, assessment of risk and implementation of control measure to enable a safe working environment for all our employees and contractors, we undertook an initial risk assessment of modern slavery in our operations and supply chains. We will continue to monitor the effectiveness of actions being taken to assess and address modern slavery risks.

Potential areas identified by us where there may be some risk for modern slavery are:

- suppliers who may use products purchased or manufactured in high-risk countries; and
- products (such as cement and steel) purchased which are made in high-risk countries.

Although we have identified there are potential areas of risk for modern slavery in our business, we consider Lucas has a low risk of modern slavery in its immediate supply chains as its continued commitment to assess and address the risks (as set out below) provide robust processes and systems to identify and remediate any actual risks that may arise.

### ***Actions taken to assess and address risks***

In order to be able to assess the risk of modern slavery in our business we rely on our robust internal policies, processes, procedures and guidelines. The following assist us to assess and address any modern slavery risks accordingly:

- HRES-GUI-102 Code of Conduct;
- HSEC-MSP-007 Suppliers, Contractors and Project Partners;
- HSEC-MSP-003 Risk & Change Management;
- HSEC-MSP-0013 Health & Wellbeing;
- HSEC-MSP-0015 Purchasing & Procurement;
- HSEC-PRO-110 Risk Assessment Procedure; and
- COMM-PRO-004 Modern Slavery Procedure.

Lucas is committed to further enhancing governance and management to address the risks of modern slavery in our operations and supply chains. Lucas has developed a Modern Slavery Procedure, the objective of which is to assist management to implement and enforce effective systems and controls to ensure that modern slavery is not taking place within our operations and supply chains.

Lucas has also included provisions within its template supply agreements (for goods and services) addressing modern slavery. Its General Counsel continues to update other agreements to include similar provisions to ensure that we meet our obligations under the Act.

### ***Assessing the effectiveness of our actions***

Lucas undertakes due diligence when considering new contractors and suppliers, which includes but is not limited to a pre-qualification process addressing obligations under the Act,

which assists us to identify, investigate and remediate any potential modern slavery issues that may be present.

We are creating a leadership package for key personnel within the business.

### ***Consultation process***

The Management Leadership Team (Managing Director, General Manager Human Resources, General Manager HSEC&Q, General Manager Civil, General Manager Mining & Crushing, General Manager Pre-Contracts & Business Development, General Manager Operations, General Manager Assets & Maintenance, General Manager Finance and General Counsel) together with the Advisory Board oversee all business practices within the Group and meet regularly to collaborate and discuss the practices of the business and how these can be improved. This statement was prepared with the collaboration from those specialists within our business.

### ***Moving forward***

Lucas continues to and is committed to further enhancing governance to address the risks of modern slavery in our operations and supply chains through its existing Risk Management Program and internal policies, procedures and management.

This statement was approved by the Group's Advisory Board on 28 August 2023 and is available on our website.



**Benjamin Lucas**

Managing Director

Lucas Total Contract Solutions

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