

CIVIL MINING & CONSTRUCTION PTY LTD

MODERN SLAVERY STATEMENT 2022-23

1. Introduction

This Modern Slavery Statement ('the Statement') for the 2022-23 financial year is given by the reporting entity of Civil Mining & Construction Pty Ltd ('CMC') (ACN: 102 557 175). This Statement applies to all CMC employees, management and suppliers. This Statement complies with and operates in accordance with the *Modern Slavery Act 2018* (Cth) ('the Act'). Each mandatory reporting criteria under the Act is outlined in Appendix A of this Statement.

CMC acknowledges the harm caused by modern slavery and human trafficking practices, and is committed to the continuous improvement of its efforts to identify and address modern slavery risks in its operations and supply chains.

2. Structure, Operations & Supply Chains

2.1. Structure

CMC is a privately-owned civil infrastructure company. As at 30 June 2023, CMC has 147 direct staff, all of whom work in Australia, and of whom 60 commenced their employment during the 2022-23 financial year.

2.2. Operations

CMC's main operations involve delivering new and upgraded regional and urban infrastructure across Australia. These operations span the following sectors/works:

- **Transport**, including pavements, bridgeworks, roadworks, rail and traffic management;
- **Mining and related resources**, including concrete structures, earthworks, drilling and blasting, crushing and screening, effluent ponds, mine site rehabilitation and tailing storage facilities;
- **Water and wastewater**, including major drainage construction and rehabilitation, dams and water storage structures and utility installations; and
- **Renewable energy**, including wind and hydroelectricity.

Some of CMC's key projects during the reporting period were:

- **Bruce Highway Upgrade:** This Project involves the replacement of 19 major culverts under the Bruce Highway at various locations within the Wide Bay Burnett District, as well as improvements to the Kanyan Road intersection. The scope of works mainly includes formation widening, specifically allowing for 3.25-metre lanes, 2-metre shoulders, 1-metre barrier verges and 1-metre Wide Centreline Treatment (WCLT).
- **Six Mile Creek Bridge Replacement:** This Project involves the replacement of the existing Six Mile Creek Bridge on Kin Kin Road near Pomona, to accommodate for two 3.8 metre-wide lanes (with 2.5 metre shoulders), a total bridge length of 76 metres consisting of, four spans each of 19 metres long supported by piers or abutments, and three piles for support. The scope of works main includes demolition of the existing timber bridge, construction of the bridge, reconstruction of the Kin Kin Road carriageway on approach and departure, and environmental protection works.

- **Carnarvon Highway Pavement Strengthening:** This Project involves pavement widening and progressive sealing of Carnarvon Highway between 46.14km – 50.5km north of Injune. The scope of works mainly includes traffic management, earthworks including verge unbound pavement, stabilisation, sprayed bitumen surfacing, culvert construction, and road furniture and pavement markings.

2.3. Supply Chains

The supply chains of CMC reflect the nature of its operations. CMC requires a range of goods and services to support its activities. The main types of goods and services procured by CMC are as follows:

- **Labour Hire and Contractors**, in accordance with all State, Territory and Commonwealth laws and requirements;
- **Plant and Equipment Hire**, including earthmoving, ancillary equipment and transport options;
- **Materials**, including quarry products, geotextiles, precast concrete products, asphalt, steel reinforcement, guardrail, signage, road furniture, construction materials and personal protective equipment; and
- **Corporate Procurement.**

The majority of CMC's suppliers, both in terms of volume and expenditure, are based in Australia. However, some of the key manufacturing inputs used by CMC are necessarily sourced from companies overseas. Further, CMC has purchased some software and information technology services and packages from overseas companies.

3. Risks of Modern Slavery Practices in Operations & Supply Chains

The potential or perceived risks of modern slavery in CMC's operations and supply chains are as follows:

- **Geographical risks**, based on an international region's human rights and labour laws, political systems, and education and skill levels; and
- **Industry or sector-specific risks**, based on the civil infrastructure industry's use of outsourcing and third party contracting arrangements, as well as the nature of its goods or services.

The principal risk of modern slavery in CMC's operations and supply chains is that it might be directly linked to modern slavery practices through the activities of its overseas supplier.

4. Assessing and Addressing Risks of Modern Slavery Practices

CMC takes a targeted, risk-based approach to assessing and addressing the modern slavery risks that may arise in relation to Sections 2 and 3 of this Statement.

4.1. Operations

CMC has, and continues to develop, arrangements that reduce the risks of modern slavery arising within its own operations.

CMC is committed to the following in respect of their direct workforce:

- To not use any type of forced, bonded or indentured labour;
- To respect the freedom of movement of their direct workforce and not restrict it by any means;
- To ensure members of their direct workforce are free to leave their employment after providing reasonable notice; and
- To comply with Australia's minimum legal working age.

As the entirety of CMC's direct workforce is located in Australia, they are protected by:

- Industrial instruments, including:
 - The National Employment Standards ('NES') of the *Fair Work Act 2009* (Cth);
 - Applicable Modern Awards; and
 - CMC's Enterprise Agreement, which either matches or exceeds the minimum lawful employment standards from the NES and the applicable Modern Awards;
- Various State and Territory work health and safety laws; and
- Various State, Territory and Commonwealth anti-discrimination and human rights laws.

Compliance with such Australian laws is also complemented by CMC's own policies and procedures, including but not limited to:

- Code of Conduct;
- Workplace Health and Safety;
- Chains of Responsibility;
- Procurement and Local Industry Participation;
- Recruitment Selection and Redeployment;
- Equal Opportunity and Anti-Discrimination;
- Induction and Onboarding;
- Training and Development;
- Disciplinary & Performance Management;
- Workplace Bullying & Harassment;
- Industrial Relations;
- Ethics & Compliance;
- Privacy; and
- Quality.

These policies also encourage the comfortable and confidential reporting of all workplace concerns, including the reporting of any modern slavery risks.

CMC has a rigorous onboarding process for new employees, which includes comprehensive employment checks to ensure that all employees have valid visas and working rights. CMC also engages in systematic wage and salary reviews, in accordance with both the minimum national wage reviews and with individual employee skill progressions.

As a consequence, CMC has determined that the risk of its operations causing or contributing to modern slavery is **low**.

4.3. Supply Chains

CMC has, and continues to develop, arrangements that reduce the risks of modern slavery arising within its supply chains.

The following is an outline of the modern slavery risks of each supply chain:

- a) **Labour Hire and Contractors:** CMC engages reputable and licensed labour hire service providers based in Australia with strict modern slavery policy compliance.
- b) **Plant and Equipment Hire:** CMC engages reputable plant and equipment hire service providers based in Australia with strict modern slavery policy compliance.
- c) **Materials and Equipment:** Whilst CMC engages some overseas suppliers due to national material or equipment shortages, CMC requires that all material and equipment suppliers have strict modern slavery policy compliance.
- d) **Corporate Procurement:** Whilst CMC procures some of its software and information technology services and packages from overseas, CMC requires that these companies have strict compliance with regards to data security.

CMC requires all suppliers to comply with all applicable regulations and legislation relating to working hours, wages, welfare and human rights. CMC also engages in due diligence processes when taking on new suppliers and subcontractors, including verifications and audits.

As a consequence, CMC has determined that the risk of its supply chains causing or contributing to modern slavery is **low**.

4.4. Remediation

Upon receiving any substantiated reports of incidents of modern slavery within either its own operations or its supply chain, CMC will engage in the following remediation actions:

- Ceasing relevant activities and/or relationships, including terminating contracts based on legislative breaches and/or non-compliance by suppliers or subcontractors; and
- Reviewing and improving CMC's existing policies and procedures.

5. Assessing the Effectiveness of Actions Taken

5.1. Assessment Methodology

During the 2022-23 reporting period, CMC did not receive any reports of modern slavery within its operations or supply chains. Further, CMC did not identify any incidents of supplier or subcontractor non-compliance.

Whilst CMC acknowledges that the risks of modern slavery within its operations and supply chains is low, CMC nonetheless recognises the need to continuously monitor and manage these risks.

5.2. Areas of Improvement

CMC is committed to identifying and managing all necessary areas of improvement with regards to assessing and addressing the risks of modern slavery in future reporting periods. CMC will commence the following

additional practices in improving the effectiveness of actions taken to assess and address the risks of modern slavery:

- Incorporating the following modern slavery clauses into all procurement contracts, including purchase orders, labour hire contracts and supplier/subcontractor agreements:
 - Significant warranties of compliance with all contractual and legal obligations relating to modern slavery;
 - Warrant that, suppliers to their best knowledge, modern slavery practices do not occur within their own supply chains; and
 - Positive obligations of prompt disclosure of any incidents of modern slavery;
- Conducting an annual review of CMC's operations and supply chains in relation to modern slavery risks, including information-gathering, reporting on findings and making recommendations; and
- Including modern slavery training as part of the induction and onboarding processes for all new employees as part of the corporate onboarding training package.

6. Consultation

Senior management, executives and the directors of CMC have all been consulted with in relation to the drafting of this statement.

7. Approval

This statement was approved by the board of CMC in their capacity as the principal governing body of CMC on 21 November 2023.



Peter Kendall

Managing Director

Civil Mining & Construction Pty Ltd

APPENDIX A – MANDATORY REPORTING CRITERIA UNDER THE ACT

The Act specifies seven (7) mandatory criteria that a reporting entity under the Act is required to cover in its modern slavery statement. The table below outlines the mandatory reporting criteria under the Act in relation to the 2022-23 reporting period, and how the criteria have been met in this Statement.

Section of the Act	Mandatory Criteria	Section in this Statement that addresses the criteria
16(1)(a)	Identify the reporting entity	Section 1: Introduction
16(1)(b)	Describe the structure, operations and supply chains of the reporting entity	Section 2: Structure, Operations & Supply Chains
16(1)(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Section 3: Risks of Modern Slavery Practices in Operations & Supply Chains
16(1)(d)	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Section 4: Assessing and Addressing Risks of Modern Slavery Practices
16(1)(e)	Describe how the reporting entity assesses the effectiveness of such actions	Section 5: Assessing the Effectiveness of Actions Taken
16(1)(f)	Describe the process of consultation with (i) any entities that the reporting entity owns or controls and (ii) for a reporting entity covered by a joint statement, the entity giving the statement	Section 6: Consultation
16(1)(g)	Include any other information that the reporting entity considers relevant	Other relevant information has been included throughout the Statement.