



Maddocks



CONSTRUCTION

PCL Constructors Pacific Rim Pty Ltd (ABN 74 140 877 792)

Modern Slavery Statement

Legislation: *Modern Slavery Act 2018* (Cth) (Modern Slavery Act)

Reporting Period: 1 November 2022 – 31 October 2023 (FY 2023)

Foreword from our Directors

PCL Constructors Pacific Rim Pty Ltd (**PCL Pacific Rim**) supports local clients and their solar, renewable energy, engineering, procurement and construction (**EPC**) and operations and maintenance (**O&M**) project needs.

PCL Pacific Rim forms part of the global PCL Construction Group Inc (**PCL Group**). Our Ultimate Parent company, PCL Employees Holdings Ltd, is 100% employee owned and we believe that employee ownership means extraordinary performance and value.

This Modern Slavery Statement (**Statement**) is drafted in accordance with the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) and covers the reporting period from 1 November 2022 to 31 October 2023 (**FY23**). While this Statement covers PCL Pacific Rim, the PCL Group's global values, policies and procedures have continued to inform our response to addressing the complex issue of modern slavery in our operations and supply chains.

Our Statement covers all of the 7 mandatory criteria for reporting as set out in section 16 of the Modern Slavery Act.

PCL Pacific Rim continues to acknowledge that modern slavery and human trafficking is a global and complex challenge. Our core values include honesty, integrity and respect. Addressing modern slavery risks in our operations and supply chains is important to ensure we are living up to our values.

The PCL Group conducts its business globally with respect for candidness, truthfulness and high standards of business ethics, and is committed to key attributes of safety, quality, sustainability and stewardship. These characteristics underpin all of our business operations and provide a positive and ethical work environment that supports doing what is right, respecting others and performing with high standards.

As it has done in the past, the PCL Group's global approach will continue to inform our emerging response to assessing and addressing modern slavery risks in our operations and supply chains, and PCL Pacific Rim will report on this approach in following reporting years.

Principal Governing Body Approval

This modern slavery statement was approved by the Board of PCL Constructors Pacific Rim Pty Ltd (ABN 74 140 877 792) in accordance with section 13 of the Modern Slavery Act 2018 (Cth) on 23 April 2024.

Signature of Responsible Member

This modern slavery statement is signed by Gopinath Govindraj in their role as Director and Country Manager of PCL Constructors Pacific Rim Pty Ltd (ABN 74 140 877 792) (in accordance with section 13 of the Modern Slavery Act 2018 (Cth)) on 23 April 2024.



Gopinath Govindraj
Director and Country Manager
PCL Constructors Pacific Rim Pty Ltd

1. Criterion 1: Identify the reporting entity

- 1.1 The reporting entity is PCL Constructors Pacific Rim Pty Ltd (ABN 74 140 877 792), with our registered office at Level 38, Olderfleet, 477 Collins Street, Melbourne, Victoria, 3000 (referred to as **we, us, our** or **PCL Pacific Rim** in this Statement).
 - 1.2 PCL Pacific Rim's primary Australian office is Suite 16.02, 201 Miller Street, North Sydney, NSW, 2060.
 - 1.3 PCL Pacific Rim is a reporting entity under the Modern Slavery Act and this Statement is submitted and published for the 1 November 2022 to 31 October 2023 period (**Reporting Period**).
 - 1.4 PCL Pacific Rim makes this Statement in accordance with section 13 of the Modern Slavery Act as a single reporting entity.
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2. Criterion 2: Describe the reporting entity's structure, operations and supply chains

2.1 Our Structure

- 2.1.1 PCL Pacific Rim is an Australian private limited company limited by shares and is incorporated in Australia.
- 2.1.2 PCL Pacific Rim does not own or control any other entities for the purpose of the Modern Slavery Act.
- 2.1.3 PCL Pacific Rim is part of the global PCL Group, a construction company incorporated in 1913 and based in Edmonton, Canada, with over 4,900 full-time salaried employees across the United States, Canada, and Australia.
- 2.1.4 The Ultimate Parent company for PCL Pacific Rim is PCL Employees Holdings Ltd, founded in 1977 and located in Canada.
- 2.1.5 PCL Pacific Rim is the only operating entity in Australia.

2.2 Our Operations

- 2.2.1 As per the Commonwealth Guidance for Reporting Entities, 'operations' refers to activities undertaken by the entity to pursue its business objectives and strategy in Australia or overseas. This includes the manufacturing, distribution and procurement of products and services.
- 2.2.2 In Australia, PCL Pacific Rim supports local clients and their solar, renewable energy and EPC and O&M project needs. Our main operations include solar farm construction including design, procurement, construction and maintenance of sites across Australia. PCL Pacific Rim offers a wide range of services throughout a project's life cycle: from design optimisation, site construction, commissioning to operations and maintenance.

2.3 Our Supply Chains

- 2.3.1 Our supply chain is complex and long and we (or our affiliates) have a wide range of suppliers and subcontractors with a mix of Australian and overseas suppliers.

2.3.2 Some of the steps and actions we take to mitigate identified risks in our supply chain are listed at section 4 below.

2.3.3 The table below sets out our supply chain at a high level:

| No. | Product / Service category | Key themes |
|---|--|---|
| Key direct suppliers and sub-contractors used in relation to core product and service offerings | | |
| 1. | Electronic equipment including switch room electronics | <ul style="list-style-type: none">As a business that supports local clients and their solar, renewable and EPC project needs, PCL Pacific Rim procures a wide range of products. These supplied products support our key product and service offerings to Australian businesses and organisations (see section 2.2.2 above).Many of our suppliers are located overseas, including in China, India, Malaysia, Japan, South Africa, Brazil, Mexico, USA, Egypt, Turkey, France, Germany, Portugal and Spain. |
| 1. | Transformers, Circuit Distribution | |
| 2. | Modules, piling and trackers | |
| 3. | Inverters | |
| 4. | Installation Materials | |
| 5. | Safety including PPE | |
| 6. | Tools | |
| 7. | Cables | |
| 8. | Connect | |
| 9. | Data and Communications | |
| 10. | Security and Weather stations Systems | |
| Indirect Suppliers | | |
| 11. | Office Supplies | <ul style="list-style-type: none">To support our key product and service offerings, PCL Pacific Rim engages a range of other suppliers who supply goods or services that are not integrated or used in our solar products and services.These are suppliers from whom we purchase goods and services relating to, for example, cleaning services, office supplies and professional services and more. |
| 12. | IT Equipment | |
| 13. | Cleaning Services | |
| 14. | Professional services (i.e. Marketing, Legal, Engineers) | |

3. **Criterion 3: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.**

- 3.1 In this section we identify the 'risks of modern slavery practices', meaning the potential for PCL Pacific Rim to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains. In this context, 'risk' means to people, rather than the risks to PCL Pacific Rim (such as reputational or financial damage).
- 3.2 We continue to acknowledge that the risks of modern slavery may be heightened in our supply chain and operations as a result of the sector and industry we operate in, the geographical location of some of our suppliers and the products we use.
- 3.3 The solar and construction industries are both recognised as higher risk sectors, that typically involve longer and complex supply chains, which means we do not always have direct visibility over lower tier/ indirect suppliers.
- 3.4 We also continue to acknowledge that we lack visibility in certain overseas markets and this, again, carries additional risks of modern slavery especially in secondary levels of our chain of suppliers and source materials used in our goods and services.

4. **Criterion 4: Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes**

4.1 **Actions taken in the Reporting Period**

Set out below in this section is an overview of the steps we have taken during this reporting period to assess and address the risks in our operations and supply chains.

4.2 **Global Policies and Procedures**

PCL Pacific Rim is part of the PCL Group, which has a number of policies and procedures in place designed to assess and address the risks of modern slavery:

- **Global Code of Conduct:** our Global Code of Conduct defines the actions, behaviours and practices expected of and required by PCL Group employees. The Code of Conduct ensures that our staff uphold commitments to anti-discrimination and harassment, a safe working environment and combatting unethical business conduct.
- **Global Ethics Hotline:** all staff and personnel have access to and are encouraged to contact the PCL Ethics Hotline to confidentially raise concerns regarding any ethics or compliance concerns.
- **Speak Up Policy:** during the reporting period, the PCL Group also took steps toward implementing a global Speak Up Policy, which establishes rules and provides guidance to staff on how to raise concerns and report breaches of the PCL Code of Conduct, and how these complaints will be handled by the PCL Group. The Speak Up Policy includes what staff should report, who they can contact and what protection they have from retaliation.

PCL Pacific Rim forms parts of the broader PCL Group, which is headquartered in Canada. We also acknowledge that Canada has enacted legislation to fight modern slavery in supply chains, which came into force on 1 January 2024. As the PCL Group considers its requirements under the Canadian regime, it is likely that a number of new global policies and procedures (such as the Speak-Up Policy) will be developed and introduced at the Group level in future years, which will likely further inform our approach in this space.

4.3 Local Policies and Procedures

During the Reporting Period we also had a number of local policies and procedures in place to assess and address risks associated with modern slavery. However, we are looking to expand on these in our future reporting years:

- **Supplier Pre-qualification Process:** before becoming a supplier for PCL Pacific Rim, a business will need to complete our Supplier Pre-qualification process which contains questions on the supplier's safety program and performance.
- **Labour:** we comply with all applicable labour laws in Australia and our Australian workforce largely consists of high skilled workers who are remunerated well above minimum wage and National Employment Standards requirements.
- **Contractual Controls:** in our Consultancy and Subcontractor Agreement, we have included a clause that the consultant or subcontractor must comply with all applicable legal requirements, including workplace/ occupational health and safety requirements. We have also included specific anti-modern slavery contractual clauses in our Special Conditions for certain projects. During the reporting period, we have also considered the Commonwealth Modern Slavery Model Contract Clauses (intended for Commonwealth Government Procurement) and accompanying guidance published by the Australian Government. This exercise has informed our approach to updating our template Subcontractor, Supply and Consultancy Agreements with specific modern slavery contractual clauses.
- **Considering other local policies and procedures:** during the reporting period, PCL Pacific Rim also considered other local policies and procedures which we may implement at the local level to supplement our global approach. For example, we considered the addition of a local Anti-Modern Slavery Policy and it has now been agreed that this will be drafted. We look forward to reporting on these additional actions in future reporting periods.

5. Criterion 5: Describe how the reporting entity assesses the effectiveness of these actions

- 5.1 PCL Pacific Rim intends to use key performance indicators (**KPIs**) to measure how effective we have been in identifying and mitigating modern slavery risks in our operations and supply chain. Based on these KPIs, we aim to continually assess our modern slavery compliance framework:

| No. | Key objective | Key performance indicator |
|-----|--|--|
| 1. | Monitoring our Ethics Hotline in line with our Global Code of Conduct. | Recording the number of promptly resolved issues raised through our Ethics |

| No. | Key objective | Key performance indicator |
|-----|--|---|
| | | Hotline that relate to possible modern slavery incidents. No issues or instances of modern slavery were reported via the Ethics Hotline in the Reporting Period. |
| 2. | Prompt remediation of critical issues or incidents which are recorded through our current reporting processes. | Recording the number of promptly resolved modern slavery or ethics issues that have been raised. During the reporting period, no modern slavery or ethics issues were reported to PCL Pacific Rim. |
| 3. | Implement and approve an Anti-Modern Slavery Policy | Whether an Anti-Modern Slavery Policy is drafted and presented to the board in FY24. |

6. **Criterion 6: Describe the process of consultation with any entities the reporting entity own or controls (a joint statement must also describe consultation with the entity giving the statement)**

6.1 As set out in section 2 above, we are the only legal reporting entity in Australia.

7. **Criterion 7: Provide any other relevant information**

7.1 PCL Pacific Rim forms parts of the broader PCL Group, which is headquartered in Canada. We acknowledge that Canada has enacted legislation to fight modern slavery in supply chains, which came into force on 1 January 2024. As the PCL Group considers its requirements under the Canadian regime, it is likely that a number of new policies and procedures will be developed and introduced at the Group level in future years, which will likely further inform our approach in this space.