# MODERN SLAVERY STATEMENT

DECEMBER 2023

HANSENYUNCKEN

**In Broad Daylight:** The Global Slavery Index has highlighted Australia's heavy reliance on imported Chinese solar panels allegedly made using forced labour from ethnic minorities.

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We acknowledge the Traditional Custodians of the land on which we work. We pay our respects to Elders past, present and emerging.



## **01 INTRODUCTION**

We are committed to the principles of ethical conduct, integrity and respect for human rights in all aspects of our business operations.

As part of this commitment, we recognise the importance of addressing modern slavery and human trafficking within our operations and supply chain. This Modern Slavery Statement outlines our approach to identifying and addressing these risks and reflects our ongoing dedication to eradicating modern slavery from our business and supply chain.

According to the Walk Free Foundation's Global Slavery Index 2023, an estimated 40.3 million people globally are victims of modern slavery, with construction being identified as one of the sectors with a higher prevalence of exploitation.

The index also highlights that many countries where Hansen Yuncken operates or sources materials from have significant challenges related to modern slavery, underscoring the importance of proactive measures to combat this issue across our operations and supply chain. In the following sections, we will describe the risks of modern slavery in our operations and supply chain, the actions we have taken to address these risks, the effectiveness of these actions, and the process of consultation we have undertaken.

This statement reflects our commitment to transparency and our ongoing efforts to ensure that modern slavery and human trafficking have no place in our business or supply chain.

"Modern slavery is not something that happens 'over there', that we don't have to think about. If we care about the people who make our products, we can make a difference."

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Grace Forrest, Walk Free Co-Founder

HANSENYUNCKEN

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## **O2 ABOUT US**

# We are driven by the challenge to build for a better planet.

This statement is made pursuant to the Modern Slavery Act (2018) and articulates the commitment of Hansen Yuncken Pty Ltd to understand all potential modern slavery risks associated with our business and to implement effective systems and controls to prevent slavery and human trafficking in our operations and supply chain. Hansen Yuncken was founded in 1918 and is a major privately owned construction company operating in Victoria, New South Wales, Tasmania, South Australia, Queensland and the Northern Territory.

Our corporate values form part of who we are and where we want to be. They are simple, relevant and are integral to our future growth.

Inclusive	Think and act respectfully; with an open, inclusive and National mindset. Better together, through a collective endeavour, and collaborative approach; 'Many minds' not only challenges norms, but empowers the individual perspective.
	We foster and harness talent through our company wide network of people and skills. Through partnership, we shift the builder client relationship from one of value, to valued.
Rigour	Our continued process of evaluation and growth contributes to evolving processes, company culture and industry. Think, evaluate and innovate; not just do. We are resourceful, drawing upon and contributing to our collective intelligence and knowledge across sectors.
	Our love of challenge fuelled by curiosity, critical thinking and attention to detail, makes a difference. Be dynamic; we don't adopt a one size fits all approach; we are adaptive, nimble and resourceful.
Responsibility	Through integrity and care, we can make a difference. Our broader view encompasses 'for the good of all'; we value people, wellness and community.
	Sustainability - environmental, economical and social remain foremost in our measurability and mindset; providing impact and legacy for the next generation. Through discipline and responsibility, we deliver on our promises and do what we say we will do.
Accomplished	Our experience and skill, fuelled by challenge, allows us to build iconic projects founded in design excellence and technical innovation. Having built for over 100 years we are aware of the legacy in building, and the consequence of our actions.
	A job well done is merited against the quality of outcome, as much as the relationships forged along the way.

### **OUR OPERATIONS**

Hansen Yuncken has approximately 600 employees located in metropolitan and regional locations including Adelaide, Albury, Brisbane, Cairns, Darwin, Hobart, Melbourne, Newcastle, Shepparton and Sydney.

The majority of our employees are employed on a full time, permanent basis. Roles include corporate services and project delivery, including constructions workers and a small number of trainees and apprentices.

Hansen Yuncken proudly delivers projects for public and private clients, including commercial, community infrastructure, Defence, education, health, hotel and entertainment, industrial, justice, residential accommodation and retail sectors.

105+ Years in operation
\$1b
Annual turnover
600+ Employees nationally
6



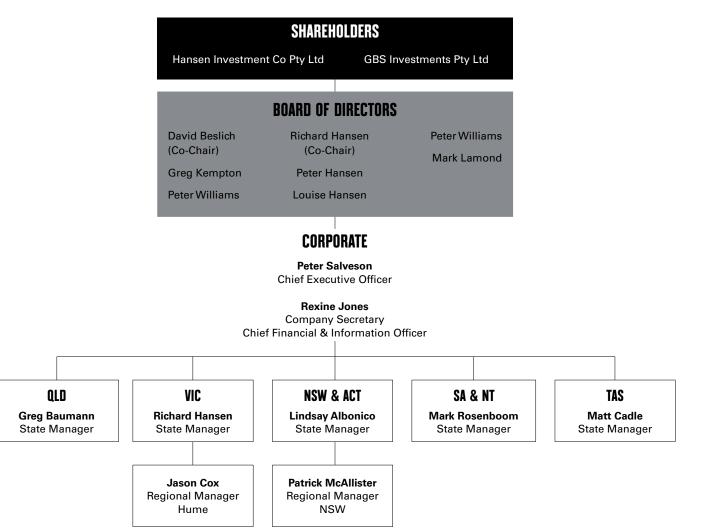
### **OUR STRUCTURE**

As a private company with two equal shareholders, Hansen Investment Co and GBS Investments, we are run, managed and audited in line with rigorous Australian corporate standards.

Hansen Yuncken's corporate structure consists of the consolidated entity Hansen Yuncken Australia Pty Ltd and two wholly owned subsidiaries, Hansen Yuncken Pty Ltd and Hansen Yuncken (Qld) Pty Ltd.

With reference to s.16(1)(f) of the Modern Slavery Act we confirm that this Modern Slavery Statement covers Hansen Yuncken Australia Pty Ltd, Hansen Yuncken Pty Ltd and Hansen Yuncken (Qld) Pty Ltd and as between them they have all been consulted and have endorsed this statement as the Board of Directors are common to all three entities. Our operations are such that the Chief Executive Office reviews and endorses policies and statements annually, to ensure these remain consistent with current business and industry activity.

The supply chain will be contracted through a variety of forms via the five branches or through corporate itself. Each state branch has an obligation to report on a bi-annual basis the status of actions undertaken by the branch to minimise the risk of modern slavery.



### **OUR SUPPLY CHAIN**

In FY22-23, Hansen Yuncken's procurement spend was over \$1b, with primary categories of spend attributed to project teams. Corporate support functions - Commercial, HR, Legal, IT and Business Development remained consistent to previous years.

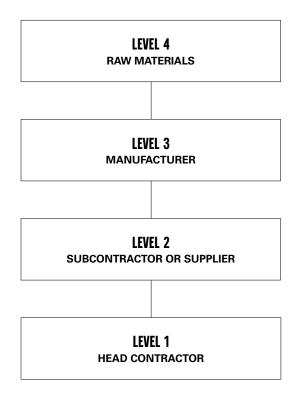
While our business relies on a diverse range of suppliers, from raw material providers (Level 4) to directly engaged subcontractors (Level 2), 99% of our procurement through our supply chain are direct with Australian businesses.

The nature of the construction industry means we often rely on manual labour, both skilled and unskilled. This labour may come from regions or demographics that are at a higher risk of exploitation, including migrant workers or those from economically disadvantaged backgrounds.

Our continued exploration and understanding of our supply chain and the associated risk profiles inform our areas of focus. taking guidance from industry experts, project partners, and data from the Global Slavery Index.

Research has identified that unregulated labour hire companies are often part of an opaque subcontracting network exploiting vulnerable workers. This includes underpayment, nonpayment of entitlements such as leave or superannuation, and substandard accommodation in certain industries, including construction.<sup>1</sup>

#### CONSTRUCTION PROJECT SUPPLY CHAIN



CORPORATE PROCUREMENT	RISK PROFILE	
Merchandise	High	
Electronics	High	
Textiles	High	
Cleaning	High	

#### LEVEL 2 SOURCED CONSTRUCTION MATERIALS

MATERIAL	SOURCE COUNTRY	<b>RISK PROFILE</b>
Bricks	Australia	Low
Concrete	Australia	Low
Facade	China, Thailand, Malaysia, Vietnam	High
Steel	Australia (processed offshore)	Low
Stone	China, India	High
Timber	Australia, Italy, Austria	Low

#### **LEVEL 3 AND 4 SOURCED MATERIALS**

MATERIAL	SOURCE COUNTRY	RISK PROFILE
Electronics (solar panels), various goods and materials	China	High
Plastic, Bricks, Stone	Indonesia	Medium
Bricks, Electronics, Textiles	India	High
Glazing, Electronics	Malaysia	Medium
Electronics, Textiles	Thailand	Medium
Furniture, Textiles	Vietnam	Medium

<sup>1</sup>Walkfree Global Slavery Index (2023) <u>https://www.walkfree.org/global-slavery-index/country-studies/australia/</u>



## **03 MANAGING RISK**

Our view encompasses 'for the good of all'; we value people, wellness and community.

The 2023 Global Slavery Index estimates that on any given day in 2021, there were 41,000 individuals living in modern slavery in Australia. This equates to a prevalence of 1.6 people in modern slavery for every thousand people in the country.<sup>2</sup>

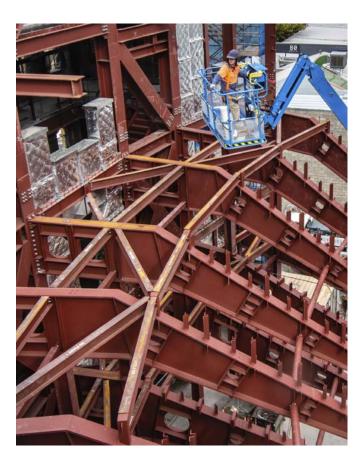
This may represent itself in Australia as unfair payment practices, inappropriate accommodation, passports being removed and threats of violence. We need to be vigilant on site if we suspect that workers are at risk of modern slavery.

Risks of modern slavery practices at Hansen Yuncken were assessed according to their potential to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains, as outlined in the human rights due diligence framework outlined in the United Nations Guiding Principles on Business and Human Rights.

<sup>2</sup>Walkfree Global Slavery Index (2023) <u>https://www.walkfree.org/global-slavery-index/country-studies/australia/</u>

### **OUR OPERATIONS**

We acknowledge the presence of modern slavery risks in Australia, particularly within the construction sector. Considering the below mechanisms in our operations, we believe that the likelihood of Hansen Yuncken causing or contributing to modern slavery to be low.



#### SUPPLY CHAIN RISK

Human Resources Governance	We maintain strong human resources controls in place for onboarding new employees, reviewing employees'wages and salary agreements, and verifying corresponding payments. These form part of our Integrated Management Systems that control the processes within our businesses.
Enterprise Agreements	100% of project based Hansen Yuncken employees are covered by enterprise or industrial agreements.
Employee Onboarding & Induction	Our employee onboarding processes include working rights employment checks managed by our Human Resources team.
	Our employee induction processes also ensure that new employees confirm they have read and understood our policies and minimum standards.
	Throughout onboarding, employees are required to complete a Modern Slavery learning module hosted on our internal Learning Management System. Employees must confirm this has been viewed and understood.
Offshore Operations	Our accounts payable function is conducted internationally, however we have conducted comprehensive investigations into the nature of the employment contracts and working conditions. Our contractual agreement includes compliance with the Modern Slavery Act 2018 (Cth).

### **OUR SUPPLY CHAIN**

We maintain a database of our supply chain comprising over 15,000 businesses across Australia, categorised into 95 specific trades.

In our ongoing efforts, we have integrated measures into all contracts and enforce compliance for all new subcontractors and suppliers. As part of our operations, certain construction materials are sourced internationally, often entailing complex supply chains that hinder transparency.

The selection of construction materials may, at times, be dictated by our clients, who may specify a particular material obtainable from a single supplier, or the subcontractor providing labour and materials. Given the intricate nature of our industry, it is challenging to fully track the various tiers within the supply chain for the multitude of components and raw materials utilised across our construction sites.

However, as part of our due diligence, we periodically evaluate and analyse our procurement data for modern slavery risks, and remain vigilant in monitoring emerging or evolving risks pertinent to the construction sector.



Offshore Supply Chain Due Diligence:

To mitigate the risk of modern slavery in our supply chain, we undertake due diligence inspections of international prefabricated material facilities, key plant and equipment production factories to ensure suppliers are acting responsibly and providing suitable and safe workplace conditions. Our extensive experience with suppliers across Asia, Europe and the Americas allow us to rapidly identify areas of concern and modern slavery risks.

**Constructing a Safe Haven for Young Women**: Hansen Yuncken has proudly partnered with The Lighthouse Foundation and the Property Industry Foundation to construct Haven House, the first Australian safe refuge designed to meet the recovery needs of young women from 14 to 22 years, escaping an early and/or forced marriage and sexual slavery.

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## **04 ACTIONS TAKEN**

## Driven by challenge, built with pride, for positive impact.

We acknowledge our obligation according to the United Nations Guiding Principles (UNGP) to address and participate in the remediation of any human rights impacts that we have caused or contributed to.

Throughout the Reporting Period, we have not identified any instances that could be linked to modern slavery.

In the event that our business may have caused or contributed to modern slavery, we would adhere to the UNGPs, which stipulate that businesses in this scenario must address the impact through a person-centered approach, safeguarding the safety, privacy, and wellbeing of the affected individuals.

Our response would involve a thorough investigation to ensure the implementation of an appropriate corrective action plan, while also assessing how similar impacts could be prevented in the future.

### TAKING PRIDE IN PROGRESS

Hansen Yuncken has made significant strides in its commitment to addressing modern slavery within its operations and supply chain. Through proactive measures and heightened awareness, our team members have strengthened transparency, supplier engagement, and risk mitigation strategies.

By prioritising worker empowerment, due diligence, and continuous improvement, Hansen Yuncken has demonstrated a firm dedication to combatting modern slavery and upholding ethical labour practices. This concerted effort reflects our commitment to fostering a responsible and sustainable business environment.



Training	We have developed a specific modern slavery course which is hosted on our internal Learning Management System, LEAD. This course is mandatory for all Hansen Yuncken team members to complete and is available for on demand viewing.
Supply Chain Survey	We have conducted a survey of high labour content companies to improve our understanding of the supply chain. We will rountinely conduct follow up surveys of the various Level 2 organisations to identify modern slavery risk areas.
Contract Terms	We have seamlessly integrated special conditions into our contracts, advising our supply chain of our commitment and expectations we have of them as supply partners.
Poster	An A3 poster highlighting modern slavery has been displayed at each construction site to encourage reporting through the Hansen Yuncken Whistleblower Policy.
Community Partnerships	We have actively engaged in several community engagement and pro bono construction activities, including partnering with Housing All Australians to refurbish a vacant aged care facility and create a fit for purpose, transitional accommodation for up to 30 homeless women over 50 years of age, at a time.
	We are currently partnering with The Lighthouse Foundation and Property Industry Foundation to to refurbish and extend an existing house in South East Melbourne to meet the recovery needs of young women aged 14 to 22 years escaping early and/or forced marriage and sexual slavery.

### **FUTURE FOCUSED**

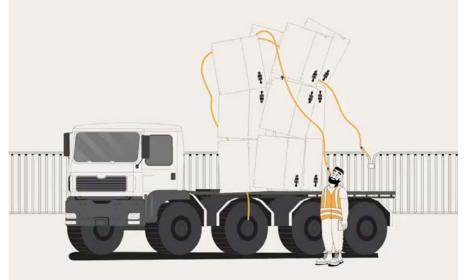
Our immediate focal points will revolve around fostering increased collaboration with industry stakeholders to pinpoint collective opportunities.

Our objective is to effect meaningful change alongside shared suppliers, while mitigating potential disruptions. We will persist in refining and advancing our approach to mitigating modern slavery risks within our supply chains. We view a consistent approach to collaboration, support, and engagement as a fundamental driver toward achieving greater transparency.

We recognise that unsafe work environments impacting worker rights can indicate modern slavery risks. Our commitment lies in safeguarding the health and safety of all workers on our sites, encompassing our own employees, subcontractor representatives, and other staff. Safeguarding worker rights is another avenue through which we aim to address modern slavery risk. In the interest of promoting safety for all, Hansen Yuncken has collaborated with Everyday Massive to develop a suite of seven animated training videos - entirely without verbal dialogue.

These training videos aim to enhance workers' comprehension of mandatory controls for critical risk categories, including:

- Transport and Deliveries
- Cranes and Lifting
- Electrical Supply and Equipment
- Mobile Plant
- Traffic Management
- Underground and Overhead Services
- Work at Height



Many Minds Make Light Work. Differently: We have partnered with human experience company Everyday Massive to develop a suite of seven training animations designed for workers to boost their understanding of mandatory controls for critical risk categories - all without a single spoken word.



## **05 ASSESSING OUR ACTIONS**

### We aim to strengthen our efforts to combat modern slavery within our operations and supply chain.

As part of our ongoing commitment to ethical business practices and corporate responsibility, Hansen Yuncken has identified key goals to enhance our approach to addressing modern slavery.

By prioritising transparency, supply chain engagement, risk mitigation, worker empowerment, due diligence, collaboration, training, and continuous improvement, we aim to strengthen our efforts to combat modern slavery within our operations and supply chain.

These goals reflect our dedication to upholding ethical labour practices, promoting worker rights, and fostering a responsible and sustainable environment, in line with our values - inclusive, rigour, responsibility and accomplished.

- Increase transparency by regularly mapping and assessing various levels of suppliers and subcontractors to identify potential modern slavery risks.
- Engage with key suppliers to raise awareness about modern slavery risks, provide training, and encourage their commitment to ethical labour practices.
- Empower workers within the supply chain by implementing mechanisms for reporting, addressing grievances, and providing access to support services. We will amend the A3 Poster to include Chinese, Vietnamese and Indian dialects.
- Actively collaborate, participate in, and continuously support partnerships with NGO's such as The Lighthouse Foundation.
- Provide comprehensive training programs for employees and suppliers to raise awareness about modern slavery risks and equip them with the knowledge to identify and address such issues.
- Update General Site Induction to incorporate Modern Slavery risk reporting mechanisms to increase awareness of modern slavery to our entire workforce.
- Continuously review and refine policies and procedures to ensure that they effectively address modern slavery risks and align with best practices.
- Investigate solar panel procurement, as this has been identified as one of five high value products imported by Australia at risk of production under modern slavery conditions.



## **06 CONSULTATION PROCESS**

## Many Minds Make Light Work. Differently.

The reporting entities have common Directors and are accountable to the same executive team.

Given the inherent nature of assessing and addressing modern slavery risk, it is imperative to engage representatives from the commercial, procurement, finance, legal, and IT (including Human Resources) teams, with oversight from management.

The individuals responsible for drafting this statement were consulted concerning all reporting entities. No other owned or controlled entities necessitated consultation for the preparation of this statement.

This statement is a reflection of the collaborative efforts carried out during the year by representatives from all aforementioned teams within Hansen Yuncken.



## **07 APPROVAL**

This statement is made pursuant to s.13 of the Modern Slavery Act 2018 (Cth) and s.24(2) of the Modern Slavery Act 2018 (NSW) and constitutes our Modern Slavery Statement. The statement has been approved by the Board of Directors who will review and update it as necessary on an annual basis.

**Peter Salveson** Chief Executive Officer December 2023



## **HANSENYUNCKEN**