


Modern Slavery Statement

Financial Year 2024

Reporting Period: July 2023 to June 2024



Building sustainable
communities and community assets
through great relationships.



Shadforth Modern Slavery Statement


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This is the third annual statement for Shadforth, pursuant to the Modern Slavery Act 2018, for the financial year ending 30 June 2024. The statement is provided by the Shadforth group of companies referred to collectively as 'Shadforth', consisting of:

- **Shadforth's Civil Pty Ltd** [ABN 68 162 606 377]
- **Dirt Wise Pty Ltd** [ABN 33 123 070 039]
- **Shadforth Plant Hire Pty Ltd** [ABN 21 116 979 714]

During the reporting period for financial year 2023/2024, Shadforth actively engaged and consulted with all companies we own or control in the development of this statement. We discussed details of the Modern Slavery Act 2018's reporting requirements; information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.

This statement was approved by the Ray Shadforth on the 27th November 2024, as the sole director and principal governing body of Shadforth's Civil Pty Ltd and subsidiary companies as listed above.



Ray Shadforth

Organisation Structure, Operations and Supply Chains

Shadforth's Civil Pty Ltd is a large privately owned Australian civil contracting company and has its head office in the Sunshine Coast, Queensland, with all contracted works being undertaken throughout Queensland and Northern New South Wales, Australia.

Shadforth was established in 1964 and has developed into one of Queensland's largest family-owned civil contracting company, the success of Shadforth has come from forming great relationships with our clients, subcontractors and suppliers. Shadforth is proud to utilise local resources wherever possible.

As part of the Shadforth group and under the same directorship as Shadforth's Civil Pty Ltd, there are two other subsidiary entities that exist in the business structure including Dirt Wise Pty Ltd and Shadforth's Plant Hire Pty Ltd.

Dirt Wise Pty Ltd is the legal employer for over 1000 employees. Dirt Wise Pty Ltd sole operations is internal labour hire to Shadforth's Civil Pty Ltd.

Shadforth's Plant Hire Pty Ltd is the legal owner of over 600 pieces of mobile plant and its sole operation is internal hire of mobile plant to Shadforth's Civil Pty Ltd, being the trading entity for civil construction projects.

Shadforth's main operations include its Civil Construction works including master residential communities, commercial and industrial subdivisions, stormwater drainage, sewer and water mains, major civil structures and culverts, bridges, tunnels, pump stations, bulk earthworks, environmental rehabilitation and road construction.

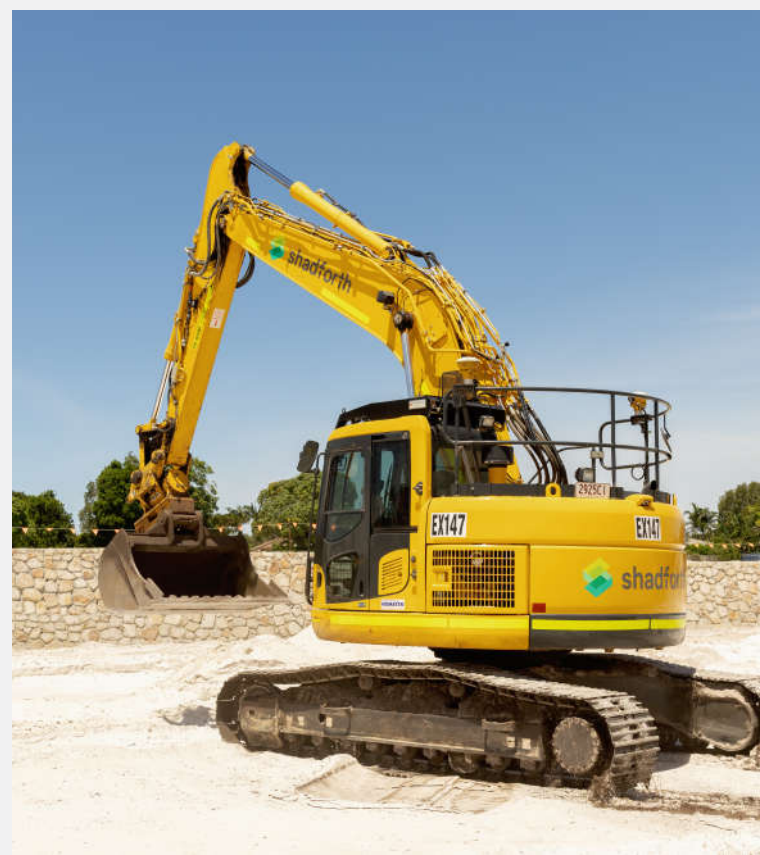
Shadforth's supply chains include the manufacture and transportation of the products it uses in its construction, such as concrete, gravel and pipes. In this context, Shadforth's supply chains include the manufacture of materials which are primarily locally sourced and the delivery and distribution of such materials. Shadforth's supply chain includes the suppliers of products and services used in its operations, including trucks, mobile plant, IT equipment, personal equipment and clothing, and temporary site facilities. Shadforth's supply chain also includes the services provided by contractors, including wet and dry hire of mobile plant, transport and labour hire of workers.

In its statement, Shadforth's Civil Pty Ltd reports on its actions to assess and address modern slavery risks in its

operations, including risks associated with the construction of civil works under contract. Shadforth also reports on how it incorporates modern slavery into its risk assessments and due diligence processes.

Shadforth Core Values have been built on respect, positive energy and hard work of our People, our commitment to a safety culture and our Excellence in delivering quality projects. form the basis of our Shadforth "Charter", which drives our people to achieve great construction outcomes for each and every project.

Shadforth supply chain plays an integral role in our success. The Shadforth Way sets out our company values that define how we do business - both internally and externally. One of our key values is Relationships - we build lasting relationships through trust and performance. We work closely with our supply chain to ensure they comply with all applicable legislative and regulatory requirements, as well as actively sharing our values. Shadforth supply chain consists solely of Australian entities. This supports the 'buy local' policies and commitments our clients often require, as well as providing Shadforth with greater oversight and ability to manage any risks associated with performance. Shadforth is actively improving due diligence processes to be compliant with all relevant legal obligations including modern slavery requirements.



Risk Assessment and Management

Shadforth core values reflect our commitment to ensuring and protecting the human rights of our employees, clients, business partners and suppliers. Over this reporting period, Shadforth continued to monitor our supply chain within our operations and maintain a risk deemed as low impact, however, we acknowledge there are potentially higher risks within some areas of our supply chain which have the ability to cause, contribute to or be directly linked to modern slavery.

From the assessment undertaken, Shadforth has identified the procurement of construction material and employee uniforms through third-party manufacturers and suppliers, as a potential risk to contribute to modern slavery practices. Shadforth continues to assess the extent of this risk and assess any further potential risks of modern slavery practices in order to implement effective governance within our supply chain.

Shadforth HR Department are proactive in assessing the recruitment process to include background reference checking and working rights checks, in an effort to mitigate human trafficking and any chance of child forced labour within our own operations. Our HR Operations conduct annual internal audits to ensure working and pay conditions are fair and equitable, across all workers irrelevant of background.



Actions Undertaken in the Reporting Period

Awareness and Training

- Continued awareness sessions conducted company-wide, including Executive members, Management, Procurement, Recruitment, employees, and subcontractors.
- FY2024: 896 individuals completed the modern slavery awareness program.
- Regular Modern Slavery reporting included in quarterly Executive reports.

System Review and Improvement

- Reviewed third-party software to enhance due diligence reporting or improve internal systems for subcontractor prequalification and contracts.
- Measured by improved prequalification surveys and automated reporting systems.
- Software review completed; final presentation pending Executive approval.

Supplier Due Diligence Strengthening

- Focussed on improving the assessment of direct and indirect supplier risks through a Supplier Code of Conduct and prequalification process.
- Measured by implementing supplier prequalification processes to identify supply chain risk areas.
- FY2025 priority: Continued Modern Slavery Risk Assessment updates with new supplier data.
- Reviewed uniform suppliers for compliance, resulting in changes to suppliers with sustainability and Modern Slavery strategies. This review will continue.

Policy and Procedure Updates

- Updated terms, conditions, policies, and systems to align with the Modern Slavery Act.
- Reviewed and updated Modern Slavery and Human Rights Policy, Recruitment Procedure, and Procurement Procedures.
- Subcontractor Terms and Conditions revised to include modern slavery clauses.



Actions for the Next Reporting Period

- Finalise Modern Slavery assessment software, with a view to implement early 2025 and implement new systems across the company accordingly, to ensure sufficient data is obtained for an accurate assessment of Modern Slavery requirements.
- Continue to deliver Modern Slavery Awareness training for our management team, procurement and recruitment teams, major subcontractors, and suppliers, in an effort to raise awareness and support with compliance. This shall be measurable in the next reporting period by how many persons undertake the awareness training, reportable through our ShadConnect Platform.
- Implement measures and to strengthen our due diligence of procuring suppliers, so as to efficiently be able to assess risks of our direct and indirect suppliers, along with being able to assess our supply chain. This shall be achieved through the implementation of supplier code of conduct or similar and supplier prequalification, as per current subcontractor prerequisites. Measurable by the implementation of a process to prequalify suppliers, ascertaining where risk level may apply within the supply chains.

shadforth

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