



**JOINT MODERN SLAVERY  
STATEMENT 2023**



**Acknowledgement  
of Country**

Delta Group acknowledges First Nations Australians as the Traditional Owners of the land and sea upon which we work. We recognise their living cultural and natural landscapes and pay our respects to Elders past, present and emerging.

CONTENTS

4

Introduction

5

Joint Statement

6

Structure

7

Operations

8

Supply Chains

9

Modern Slavery  
Risk Assessment

10

Key Actions

11

Mandatory  
Reporting Criteria

## REPORTING ENTITY

ENTITY STRUCTURE,  
OPERATIONS AND  
SUPPLY CHAINSRISKS OF MODERN  
SLAVERY PRACTICESACTIONS TAKEN BY THE  
REPORTING ENTITYASSESSMENT OF  
ACTIONS TAKENPROCESS OF  
CONSULTATION

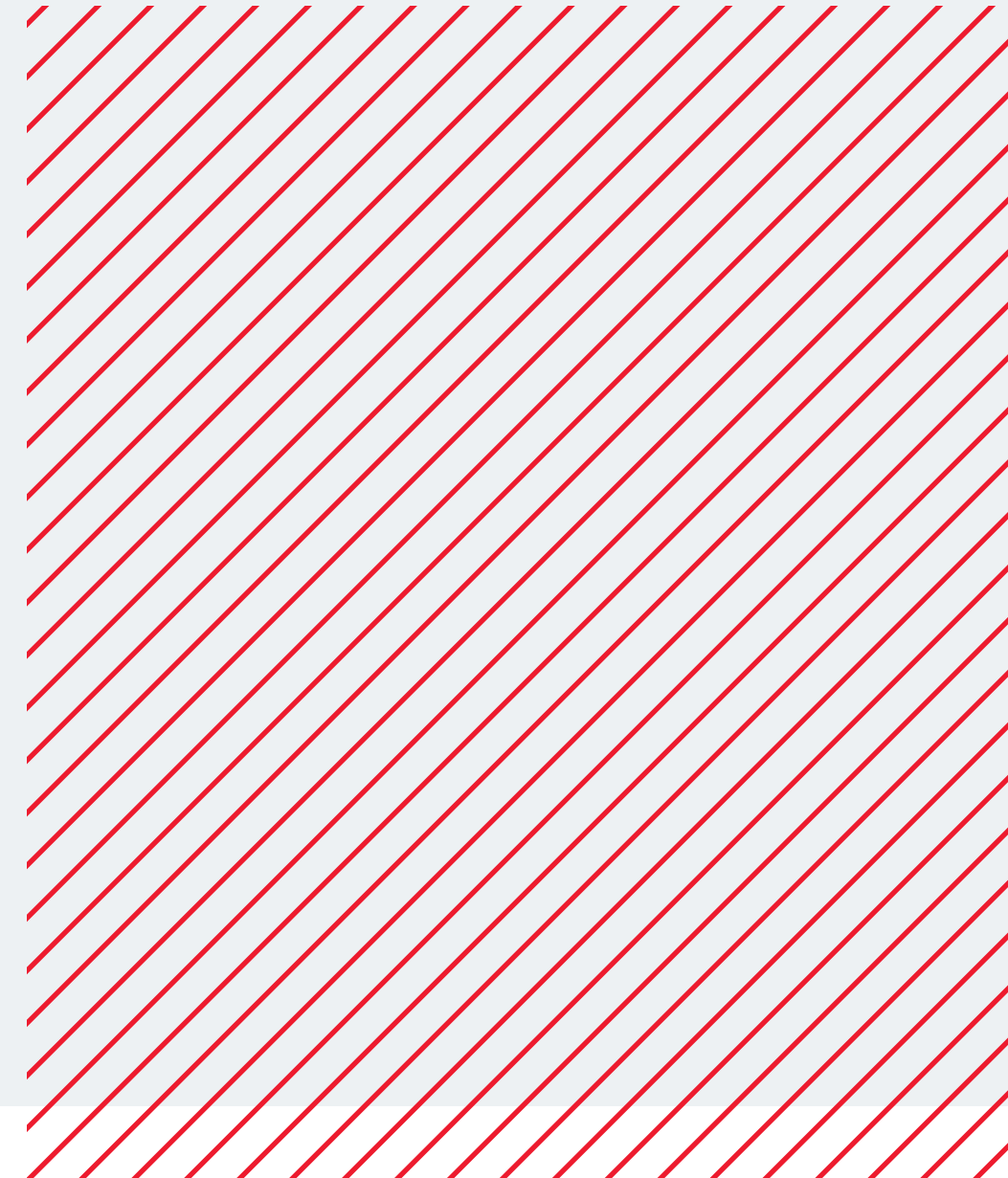
## Introduction

As reporting entities under the Commonwealth Modern Slavery Act 2018 (**'the Act'**), Delta Group Holdings Pty Ltd and Delta Pty Ltd (**'Delta Group'**) are obligated to publish a Modern Slavery Statement for the financial year ending 30 June 2023.

Delta Group Holdings Pty Ltd is a common holding company incorporating the following subsidiaries and related entities that are subject to common control by the single largest shareholder:

- + Delta Pty Ltd (*Joint Reporting Entity*)
- + Delta Recycling Pty Ltd
- + Delta Rent Pty Ltd
- + Browns Piling Pty Ltd
- + BRC Piling and Foundations Pty Ltd
- + CMA Contracting Pty Ltd
- + Whelan the Wrecker Pty Ltd
- + Clifton Grange Pty Ltd

On 1 July 2022, Delta Group Holdings Pty Ltd acquired 100% of shares in BRC Piling & Foundations Pty Ltd. On 28 October 2022, Delta Group Holdings Pty Ltd acquired 100% of shares in Browns Piling Pty Ltd. No other significant changes, events, matters or circumstances have arisen or occurred since 30 June 2022.





## Joint Statement

In accordance with the Act, Delta Group has chosen to publish a Joint Modern Slavery Statement.

This Joint Statement has been prepared in consultation with each reporting entity as well as each subsidiary and related entity under common control.

We have addressed all of the mandatory reporting criteria and received the approval of our Principal Governing Body, on behalf of each reporting entity.

This Joint Statement was approved by Con Petropoulos; Sole Director of Delta Group Holdings Pty Ltd, in the capacity of Principal Government Body and as the parent entity of Delta Pty Ltd on 22 December 2023.



Con Petropoulos

**DIRECTOR**

Delta Group Holdings Pty Ltd

22 December 2023





REPORTING ENTITY
<b>ENTITY STRUCTURE, OPERATIONS AND SUPPLY CHAINS</b>
RISKS OF MODERN SLAVERY PRACTICES
ACTIONS TAKEN BY THE REPORTING ENTITY
ASSESSMENT OF ACTIONS TAKEN
PROCESS OF CONSULTATION

## Structure

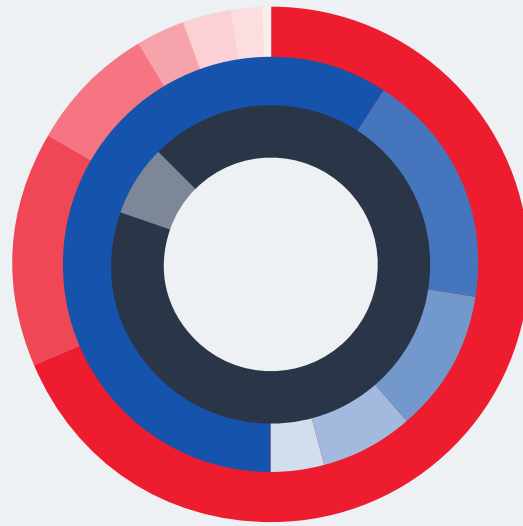
Our organisational structure includes key divisions based upon operational (entity specific) and/or geographical (State or Territory specific) contracting services, with specific market segments and/or contracting services differentiating them from other group entities. An executive management team is responsible for group wide culture and performance.



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RISKS OF MODERN SLAVERY PRACTICES
ACTIONS TAKEN BY THE REPORTING ENTITY
ASSESSMENT OF ACTIONS TAKEN
PROCESS OF CONSULTATION

## Operations

Delta Group operates solely in Australia with day-to-day operations involving the supply of diversified and integrated contracting services to a wide range of clients spanning industrial and urban (commercial) sectors. Established in Victoria since 1988, Delta Group now operates in all States and Territories of mainland Australia with offices in Darwin, Brisbane, Sydney, Canberra, Melbourne, Adelaide and Perth, as well as regional branches in Karratha, Latrobe Valley, Illawarra and Hunter Valley.

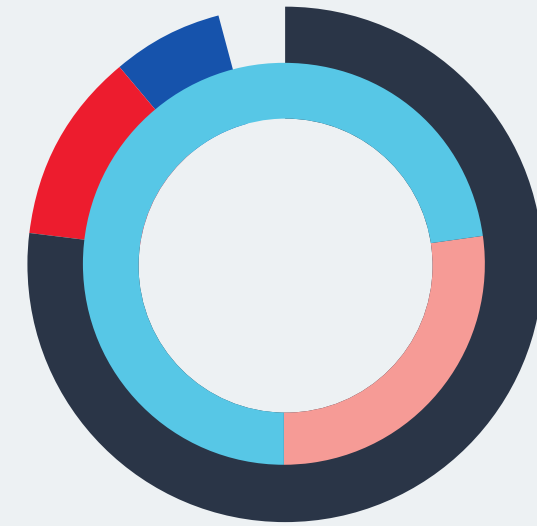


+ Organisational Capacity (People)

VIC	69%
NSW	15%
QLD	8%
SA	3%
WA	3%
ACT	2%
NT	0.5%

Labourers & Operators	58%
Corporate Services	18%
Engineers	11%
Foreman & Supervisors	7%
Management	4%
Male	93%
Female	7%

Apprentices & Trainees	4%
Interns, Cadets & Graduates	3%



+ Revenue splits

Urban	77%
Industrial	12%
Heavy Plant Hire	7%
Recycling	4%
Commercial	73%
Government	27%

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PROCESS OF CONSULTATION

## Supply Chains

Delta Group works directly with more than 2,000 suppliers to the Australian building and construction sector, including specialist manufacturers, subcontractors, consultants and traditional commercial vendors. Our supply chains are diverse and geographically aligned to our operations in each (mainland) Australian State or Territory, encompassing SOHO and SME businesses through to medium and large, multi-national businesses. Our estimates remain unchanged from previous statements in that approximately 95% of goods and services procured by Delta Group are manufactured or sourced within Australia, with a limited or highly specialised range of goods manufactured in China, India, Thailand, Indonesia, Malaysia, Taiwan, Japan, Korea, UK & Europe, Mexico and the USA – and sourced from Australian based distributors.



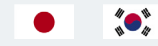
**Australia**

Transport & Haulage; Drilling, Piling & Foundations; Scaffolding; Occupational Hygiene; Professional Services; Engineering Design; Environmental Monitoring & Analysis; Geotechnical Analysis & Surveying; Asbestos Removal; Cranage & Rigging; Concrete, Asphalt & Steel Supply; Uniforms & PPE; Emergency & Disaster Response; Horticultural Design & Installation; Arborist Services; Electrical, Hydraulics & Plumbing Trades; Archaeological & Cultural Surveys; Labour Hire - Security, Cleaning, Traffic Management; Training; Lighting; Office Furniture, Supplies & Consumables; Accommodation & Travel; Soil & Water Remediation; Landscaping; Construction Materials; Waste Management & Landfill



**China**

IT&T Hardware; Heavy Plant, Equipment & Spare Parts; Power Tools & Batteries; Steel Concrete; Rubber; Landscaping Supplies; Construction Materials; Geotextiles & Waterproofing Membranes; PPE & Face Masks; Cleaning Products; Uniforms; Office Supplies & Furniture



**Japan & South Korea**

IT&T Hardware; Heavy Plant, Equipment & Spare Parts; Light Vehicles & Spare Parts; Power Tools & Batteries



**USA & Mexico**

Heavy Plant, Equipment & Spare Parts; Power Tools & Batteries; Geotextiles & Waterproofing Membranes; Light Vehicles & Spare Parts; IT&T Hardware



**UK & Europe**

IT&T Hardware; Heavy Plant, Equipment & Spare Parts; Power Tools & Batteries



**Thailand**

Light Vehicles & Spare Parts; Construction Materials; Landscaping Supplies; IT&T Hardware



**India & Pakistan**

Construction Materials; Landscaping Supplies; Uniforms & PPE



**Taiwan**

Power Tools & Batteries



**Malaysia**

IT&T Hardware; Power Tools & Batteries



**Indonesia**

Construction Materials; Landscaping Supplies; Rubber

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ACTIONS TAKEN BY THE REPORTING ENTITY
ASSESSMENT OF ACTIONS TAKEN
PROCESS OF CONSULTATION

	PRODUCT/ SERVICE RISK	GEOGRAPHIC RISK	SECTOR RISK	ENTITY RISK
DIRECTLY CAUSES MODERN SLAVERY	NEGLIGIBLE	NEGLIGIBLE	NEGLIGIBLE	NEGLIGIBLE
DIRECTLY LINKED TO MODERN SLAVERY	MEDIUM-NEGLIGIBLE	MEDIUM-NEGLIGIBLE	MEDIUM-NEGLIGIBLE	MEDIUM-NEGLIGIBLE
DIRECTLY CONTRIBUTES TO MODERN SLAVERY	MEDIUM-HIGH	MEDIUM-HIGH	MEDIUM-HIGH	MEDIUM-HIGH

### Modern Slavery Risk Assessment

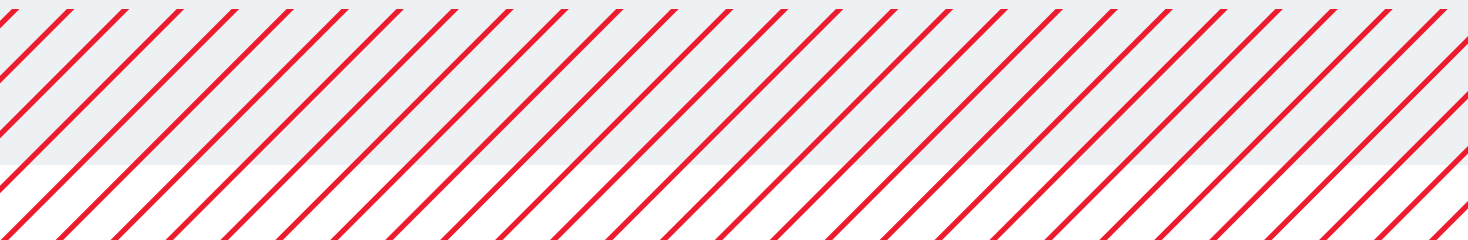
The most 'at risk' types of Modern Slavery that exist in our supply chains involve Forced Labour, Child Labour, Servitude and/or Trafficking In Persons.

Delta Group procures Plant & Equipment, Spare Parts, IT&T Hardware, Uniforms and PPE that may involve forced labour risks in China, via global supply chains in the USA, UK, Europe, South Korea, Japan, Malaysia and Thailand. Similarly, we procure Power Tools & Batteries that may involve child labour risks in Central Africa, via global supply chains in the USA, China, Mexico, UK, Europe, South Korea, Japan and Malaysia.

The risk that Delta Group directly causes any type of Modern Slavery as a result of our operations remains negligible. Ongoing communication and surveying of our domestic supply chains continues to indicate high levels of awareness and understanding of the Act and the statutory obligations for upstream and downstream entities across the Australian building and construction sector.

Given the stability of our operations, including supply chains and client base, together with past actions and ongoing, the risk that Delta Group is directly linked to Modern Slavery has been rated as medium-to-negligible.

The risk that Delta Group contributes to Modern Slavery remains medium-to-high as a result of opaque supply chains for specific materials and/or goods from high risk countries.





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RISKS OF MODERN SLAVERY PRACTICES
<b>ACTIONS TAKEN BY THE REPORTING ENTITY</b>
ASSESSMENT OF ACTIONS TAKEN
PROCESS OF CONSULTATION

## Key Actions

Work is ongoing from 2022 and previous statements, including (but not limited to):

- + ISO management system certification – incorporating social and sustainable procurement
- + Contracts review – incorporating and reviewing relevant terms and conditions
- + Management training – executive, divisional and frontline
- + Subcontractor and supplier prequalification assessments – new and existing suppliers (renewals)
- + Supply chain auditing – with a specific focus on high-risk products: Plant & Equipment, Spare Parts, IT&T Hardware, Uniforms, Power Tools & Batteries, and PPE
- + Staff inductions – incorporating and reviewing relevant content

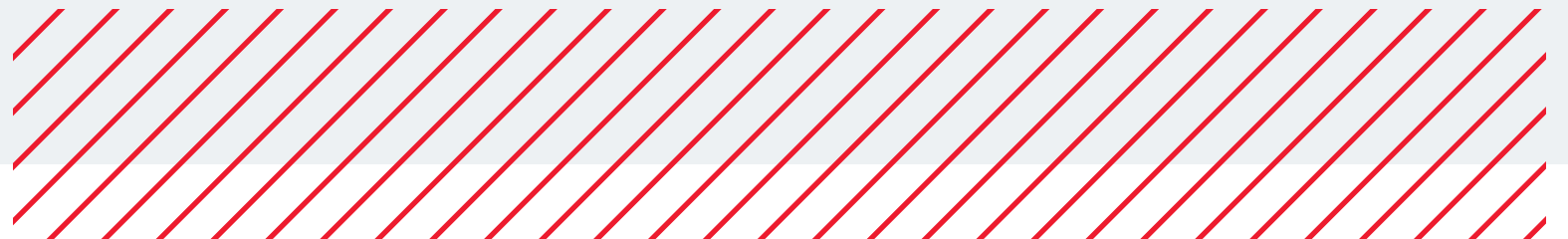
New actions identified for 2023-24 focus on improving group wide (organisational) capacity. In particular, new systems and structures to better track, assess and report on Modern Slavery risks.

### Social Procurement Working Group

Executive management endorsed committee of key personnel established to oversee development and implementation of corporate policies and practices relating to social (and sustainable) procurement, including Modern Slavery.

### Business Intelligence Tools & Systems

Development of tools and systems to communicate, track, monitor and report on social (and sustainable) procurement practices, including Modern Slavery.



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**FRAMEWORK**  
Governance & Policy

**ACTION**

- + Social Procurement Working Group
- + ISO management system certification
- + Contracts review
- + Staff inductions
- + Management training

**MEASURE**

- + Executive management oversight
- + Meeting minutes/attendance
- + % staff inducted
- + % management trained
- + % contracts with T&Cs

**FRAMEWORK**  
Supply Chains

**ACTION**

- + Prequalification assessments
- + Targeted Audits

**MEASURE**

- + Supplier segmentation per risk profile and (product/service) rating
- + % of targeted audits complete

**FRAMEWORK**  
Monitoring

**ACTION**

- + BI Tools & Systems

**MEASURE**

- + Social (and sustainable) procurement tracking/reporting
- + % audits complete
- + Audit risk ratings/profiles



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ENTITY STRUCTURE,  
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SUPPLY CHAINSRISKS OF MODERN  
SLAVERY PRACTICESACTIONS TAKEN BY THE  
REPORTING ENTITYASSESSMENT OF  
ACTIONS TAKENPROCESS OF  
CONSULTATION

## Consultation

In accordance with the act, executive and senior management from Delta Group and all related and controlled entities have been consulted in the preparation of our Joint Modern Slavery Statement 2023.

Consultation took place by way of online (Microsoft Teams) meetings, email and telephone calls.

Key executives were involved in the production of this Joint Modern Slavery Statement prior to its approval by our Managing Director; in their capacity as Principal Governing Body under the Act.



## Mandatory Reporting Criteria

### Page 3

Identify the reporting entity

### Pages 5–7

Describe the reporting entity's structure, operations and supply chains

### Page 8

Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls

### Page 9

Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes

### Page 10

Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks

### Page 11

Describe the process of consultation with any entities the reporting entity owns or controls

### N/A

Any other relevant information







***SHAPING  
TOMORROW***