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BUILDING WITH TRUST®

MODERN SLAVERY REPORT

FINANCIAL YEAR 2021



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## MANAGEMENT STATEMENT



At North, respect goes beyond an acknowledgement and appreciation of individuals' uniqueness but also includes honouring all fundamental human rights associated with this obligation.

The North core values of trust, respect, relational, excellence and fun are a bedrock and fabric of our organizational culture.

We acknowledge the complexity around modern slavery practices and the threat this poses to fundamental human rights such as the right to dignity of human person and personal liberty.

Consequently, we have made clear to our people, clients, and suppliers what the company's expectations and commitment are towards eliminating modern slavery in our operations and supply chain.

This statement has highlighted potential areas in which North could possibly contribute to or be directly linked to modern slavery through its constructions and supply chain.

Although there has not been any instance of modern slavery practices recorded in our direct pool of suppliers and subcontract workforce, the business has identified six (6) areas of potential threats to violation of human rights that could potentially abet modern slavery of our people, our clients, and our supply chain.

We have institutionalized systems that constantly evolve to mitigate the ever-changing dynamics of modern slavery acts in all its forms. As these changes occur, we will consistently recalibrate and improve our system to identify and combat the risk of modern slavery practices in our operations and supply chain.

This statement has been prepared on behalf of North Construction & Building Pty Ltd in accordance with the Modern Slavery Act 2018. Consultation has been conducted through our workforce, including our Senior Management Team and has been approved by the Directors of North Construction & Building.

Matthew Cook  
Managing Director  
**North Construction & Building Pty Ltd**

## NORTH, YOUR TRUSTED BUILDING PARTNER®

North Construction and Building Pty Ltd are a privately owned company with a Head Office in Tuggerah NSW and working across the Regional New South Wales and South East Queensland. North are proud to have a 30+ year reputation for strong relationships with local contractors and suppliers who have supported us through consistent growth to become a medium sized business with approximately 100 directly employed staff.

Over 96% of North’s direct suppliers and contractors are also based within this same geographical boundary, with the remainder still being Australian operated businesses. As such, North’s exposure to risk within our supply chain is regarded as minimal.

**TRUSTED REGIONAL BUILDING PARTNER.**

As a trusted building partner, North plays a significant role in the regional construction landscape. Our business has operated successfully on the Central Coast, NSW for more than 34 years and, over those years, has grown to work more broadly in the Hunter, Newcastle, Port Stephens and Northern Sydney regions.

Since the expansion of our employee shareholding group in 2018, growth further afield into Western NSW, Northern NSW and South East QLD regions has been carefully considered and planned to a point where we are confident our reputation of trust and the same approach to business as our historical delivery areas, particularly with subcontractors, will be upheld and indeed successfully replicated.

The map displays the geographical footprint of North's operations across regional Australia. Key locations are marked with green dots and labeled: SOUTH EAST QLD, WESTERN NSW, MUDGEE, ORANGE, BRISBANE, NORTHERN NSW, NEWCASTLE & HUNTER REGIONS, and CENTRAL COAST & NORTHERN SYDNEY.

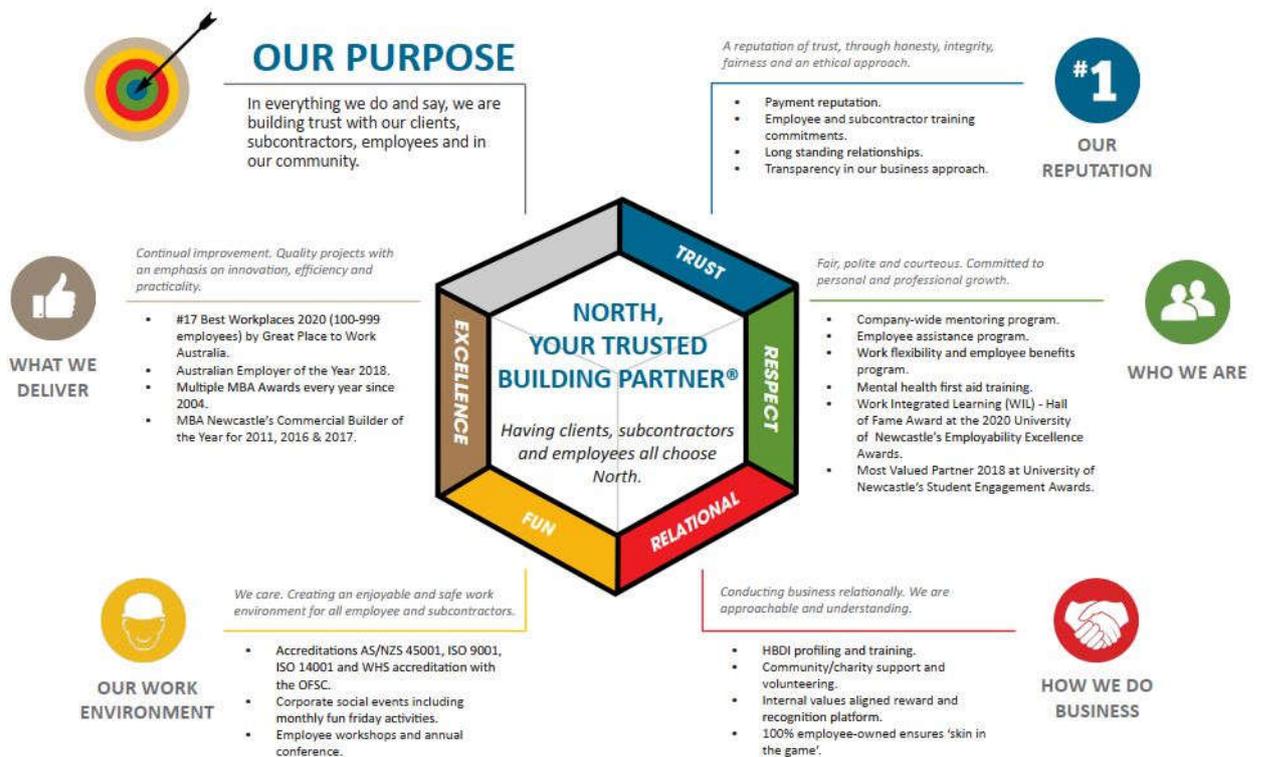
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- ORANGE**  
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Orange NSW 2800
- BRISBANE**  
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**THE TRUE NORTH COMMITMENT**

North is committed to institutionalizing a zero-tolerance system towards modern slavery through its construction supply and value chains.

True to our philosophy and value of trust, we are committed to ethical practices that will contribute to accelerating the stamping out of modern slavery in all its forms.

North complies with state, national, and international legislations against modern slavery in addition to the Modern Slavery Act 2018(Clth) and the Modern Slavery Act 2018 (NSW).



OUR CLIENTS



## NORTH'S ASSESSMENT OF RISK TO HUMAN RIGHTS

An assessment of North's risk to breaching Industrial laws or human rights has resulted in the identification of the following elements being identified as our most exposed areas;

- Workplace Health and Safety, including Return to Work pathways and Workers Compensation
- Freedom of Association
- Discrimination and bullying
- Bribery and corruption
- Access to grievance mechanisms and consultation
- Labour rights – including
  - Wage agreements, benefits, and superannuation
  - Work hours and fatigue management
  - Subcontract agreements
  - Entitlements of the above regarding imported goods

## NORTH'S STAFF AND DIRECTLY CONTROLLED WORKERS

Any person performing permanent or casual work for North is employed under the relevant industry award or on a salary arrangement above this award. Recruitment at North has been designed to build a diverse and inclusive workplace, supportive of young workers, minority groups and our indigenous population.

All staff at North are inducted into the company values and Code of Conduct during our onboarding process, and regularly thereafter. North's Code of Conduct details our expectations for lawful, fair, ethical, and accountable behavior of all employees for the duration of their employ, both on and off duty.

North support this standard of behavior by promoting an open and non-adversarial reporting framework, providing internal and external mentoring, internal and external counselling, and by partnering with organizations that are committed to long term community growth and empowerment. North's training in our organizational policies and procedures ensures that all employees are aware of their obligations and have access to these documents and further information about these when required.

## NORTH'S SUPPLY CHAIN: AN EXCELLENCE-DRIVEN PROCESS

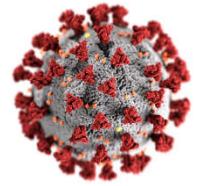
At North, our value of Excellence is not limited to delivering quality finished products, but also reflected in the transparent and stringent compliance to ethical practices operational and governing the industry.

This requires that all suppliers and subcontractors who contribute to our delivered goods complete a statutory declaration stating compliance with Australian workplace regulations and wage entitlements. North have recently introduced a Supplier Code of Conduct which details North's minimum expectations of our suppliers regarding compliance with local laws regarding human rights, labour procurement and remuneration, work health and safety, environment, and supplier diversity.

Suppliers' ability to meet or exceed the standards detailed within our Supplier Code of Conduct form a part of North's procurement strategies and are included within the general conditions of contract provided to all suppliers and contractors.

## ADDITIONAL MEASURES TO COMBAT THE AFFECTS OF COVID-19 ON MODERN SLAVERY

The COVID-19 outbreak has had drastic impacts on supply chains due to border closures and industry closures as countries around the globe have battled to reduce the spread of the coronavirus within their populations. These disruptions have had significant impact on third world and developing nations which do not have government backed income protection and pensions, leaving workers in labour and logistics trades without an income stream, and more exposed to modern slavery risks as a means to survival.



Some examples of these include ;

- Families unable to feed young children resorting to survival means such as child stowaways in freight ships and logistics, whom in turn can potentially be used for underpaid child labour, unsafe work practices, or sex slavery
- Closure of brothels and adult entertainment driving higher instances of sex slavery and servitude
- Lack of paid sick leave has resulted in incentivising workers to continue to work whilst being infectious with COVID-19, and/or putting other family/community members at increased demand to make up for lost income should workers be unable to work whilst sick.
- Border closures have resulted in reduction of tourism related income (including black market and pickpocketing) which has led to high levels of unemployment, increased crime (particularly theft and gang related violence) and desperation within whole communities to perform works below award wages, and obtaining of employment through bribery and corruption
- Industry closures and reduction in economic stability, combined with border closures has led to an increase in the number of illegal immigrants across the globe, in turn increasing the number of exploited workers within the unskilled labour market
- Lack of income from industry closures has led to an increase in domestic violence (particularly for women and children), and pressure to resort to alternative income streams from sources prone to modern slavery

Some industries (such as sanitiser and elastic manufacturing) have faced different supply chain disruption, being increased demand for goods, which has stretched the capacity of industries to resource skilled and competent labour, in turn resorting to extended working hours and child labour to meet resource needs.

From these studies, North have increased our monitoring for shortages within our supply chain from overseas markets and are requiring additional focus on early procurement for supplies, and investigation to alternative product solutions. In this way, our efforts are assisting to provide stability to manufacturing markets and logistics chains, and reduce the impacts of Modern Slavery within our supply chain.

With such substantial disruptions to supply chains around the world, North are seeking to outsource a revised study on our tiered supply chains to provide a more current and accurate evaluation on where our highest levels of risk may be found within the industries that supply our procured goods.

## NORTH'S RELATIONAL REPORTING AND GRIEVANCE MECHANISMS

North actively encourage anyone to take action and report on any behaviour that does not meet our minimum expectations and provide multiple avenues for communication and anonymous incident notification.

## CONTINUAL IMPROVEMENT AND FUTURE COMMITMENTS

Over the next year, North will expand on our commitment to The Modern Slavery Act 2018 by;

- Remaining current to the affects of COVID-19 within our supply chain, particularly within off shore freight and logistics sectors.
- Providing information and resources to our contractors and suppliers about risk to their supply chains including face to face training on Modern Slavery, should COVID-19 restrictions allow.
- Reviewing supply chain risks based off altered supply needs, altered logistics streams, and altered manufacturing providers following on from impacts of COVID-19.
- Obtaining statements of compliance to our Supplier Code of Conduct and commitment to eliminate Modern Slavery.
- Providing further training to our staff on Modern Slavery and the risks to the organization.

## NORTH CONSTRUCTION & BUILDING PTY LTD

This statement was approved by the principal governing body of North Construction & Building Pty Ltd on the 15th of December 2021

CONTACT US



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