



# MODERN SLAVERY STATEMENT

## FINANCIAL YEAR 2023 / 2024

Revision: A

Issue: July 2024

## 1 Company Details

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Stephen Edwards Constructions Pty Ltd (SEC) is the Modern Slavery reporting entity.

Company details:

- ACN: 001 824 139
- ABN: 65 001 824 139
- Incorporation date: 1979
- Head Office: 140 Wicks Rd, Macquarie Park NSW
- Contact Details:
  - Ph: 02 9891 3099
  - Email: [primary@stephenedwards.com.au](mailto:primary@stephenedwards.com.au)
  - Website: [www.stephenedwards.com.au](http://www.stephenedwards.com.au)
  - Modern Slavery Representative: Tom Glynn, Systems & Compliance Manager

## 2 Structure, Operations & Supply Chains

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### Structure

SEC is an Australian, privately owned, family business with no parent company. It is owned by It is therefore a 'single reporting entity'.

There are four company Directors.

### Operations

SEC is an established Australian building company specialising in the construction of education, health, commercial, infrastructure, aged care and government projects. We complete a range of commercial construction projects across metropolitan & regional New South Wales. Since the company's incorporation in 1979, SEC has completed over 600 construction projects. SEC employees approximately 130 staff. The company's operations include:

1. Construction
2. Design management
3. Cost planning

### Supply Chains

SEC delivers our projects by engaging a wide range of subcontractors and suppliers to provide materials and labour. Our supply chain consists of these subcontractors and suppliers.

This supply chain is very varied and dynamic. The procurement and engagement of subcontractors and suppliers is dependent on individual project requirements. These change from project to project. Products are often specified by clients and their designers, which means that elements of our supply chain are outside the control of SEC. Subcontractors and suppliers who form our supply chain vary in scale and nature (i.e. a range of local, regional and international businesses). They are selected based on project requirements.

Generally - most Subcontractors are Australian Companies and local companies.

Suppliers provide products based on project requirements. Products and are sourced both locally and overseas. We promote the supply of Australian products from Australian suppliers where possible.

### 3 Assessment of Risk of Modern Slavery Practices

We have assessed SEC’s risk of exposure to modern slavery practices to our operations we have identified the following:

TYPE OF MODERN SLAVERY RISK	RISK RATING
Direct Employment of SEC workforce There is no risk of Modern Slavery occurring in our direct operations i.e. in the direct employment of our staff due to our employment conditions	Nil
Workers directly working on sites employed by subcontractors	Very Low
Workers in Australia who are not directly employed on or work sites, however engaged in the supply chain of products that are used on our projects	Very Low
Workers who are overseas who are not directly employed on or work sites, however engaged in the supply chain of products that are used on our projects	Medium

Based on the above, we believe that the highest risk is within our supply chains is where imported goods, particularly those from South-East Asia, may engage workers exposed to modern slavery practices. This is also the most difficult risk to control and manage. SEC have conducted a Risk Assessment of our supply chain, targeting our most commonly used, and most dependant material suppliers and are aware of risks that exist with these supply chains and will continue to evaluate alternative suppliers based on their risk profile and active pursuits to reduce or eliminate Modern Slavery.

### 4 Actions taken to address Modern Slavery Risks

We implement the following actions to address the risk of modern slavery;

#### Direct Employees

- All direct employees are employed on an individual basis in accordance with Australian Laws. This removes any risk of Modern Slavery in our direct workforce.
- Where SEC directly employ any person who is not an Australian Citizen, we monitor the scope and currency of visas to ensure compliance, and do not keep hold of physical copies of visas, passports, or any other document pertaining to ability to freely leave.
- SEC implement an a variety of corporate policies that support and strengthen our efforts toward elimination of Modern Slavery within our Supply Chain, including ;
  - Modern Slavery Policy
  - Whistleblower Policy
  - Corporate Social Responsibility Policy
  - Industrial Relations Policy
  - Workplace Bullying and Harassment Policy
  - Equal Opportunity Policy
  - Fraud and Corruption Policy
  - Dispute Resolution Policy

These policies are attached to this document.

#### Subcontractors’ employees and supply chains

- Modern Slavery requirements discussed during Subcontract procurement
- Modern Slavery Provisions are included with Subcontracts

- Promote the engagement of the following types of subcontractors:
  - Local businesses with known workforces
  - Use known subcontractors with proven record of compliance
  - Preference for majority direct workforce rather than labour hire workers
- Any identified breaches of Modern Slavery compliance are recorded in formalised process that notifies all other staff involved in the procurement process – including historical breaches.

#### Supply chain for products used on our projects

- Modern Slavery Provisions are included with Purchase Orders
- Promote the use of Australian products where possible
- Promote the use of 'established' companies where overseas products must be used where companies have Modern Slavery compliance systems in place.
- Reviews conducted on our suppliers include informing other staff involved in the procurement processes of the business of any breaches or areas of high risk, along with promotion of low risk alternatives to current suppliers.

If Modern Slavery practices are suspected to have occurred in our Subcontract workforce or supply chains, the following process will be implemented:

1. Suspend the Subcontract / Supply of Materials
2. Investigate the activity to confirm if there is Modern Slavery (as defined by legislation) occurring
3. Report Modern Slavery practices to appropriate authorities
4. Discontinue to use the offending Subcontractor or Supplier permanently, or if this is not reasonably practicable, suspend the use of the Subcontractor or Supplier until the Modern Slavery event / risk is resolved and sufficient measures are put in place by the organisation to prevent the re-occurrence of Modern Slavery.

## 5 Assessing the Effectiveness of Modern Slavery Compliance

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SEC has nominated Tom Glynn, Systems & Compliance Manager, to hold the responsibility of assessing Modern Slavery Compliance within our company. As part of this role Tom will complete checks, from time to time, on the following processes:

- Modern Slavery requirements discussed at subcontract contract award – checked via POST TENDER CHECKLIST form
- Modern Slavery Provisions are included with Subcontracts

Tom should provide outcomes of compliance checks to the Director(s) for review. If non-compliances are encountered, Tom is to immediately notify the Director.

## 6 Consultation & Training

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Consultation with SEC Employees:

- Employees have been trained on what Modern Slavery is and how SEC will address the risks of Modern Slavery. Training Records are kept as confirmation.
  - Consultation has been sought as part of this training.
- Annual refresher training will be provided to ensure that staff are kept informed and up to date on Modern Slavery requirements.

- New employees will be trained on how SEC manages Modern Slavery risks and compliance as appropriate.

Consultation with Suppliers & Subcontractors:

- Modern Slavery requirements discussed at subcontract / purchase order award
  - SEC has included Modern Slavery compliance requirements in the POST TENDER CHECKLIST form. This form is used to ensure that Modern Slavery is addressed as part of our procurement process in a format that allows 2 way communication between SEC and our supplier.
- Modern Slavery Provisions are included with Subcontracts to form binding agreements

Other training and consultation:

- Tom Glynn, Systems & Compliance Manager, has undertaken training sessions and consultation with external providers who have provided guidance on Modern Slavery and our compliance requirements.
- Mathew Edwards, Director, has attended external workshops on Modern Slavery.
- We have had consultation with some key clients on Modern Slavery and how we achieve compliance e.g. Catholic Education Office and Opal HealthCare.

## 7 Management Statement

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Modern slavery is a global phenomenon which includes a range of activities that seriously deprive individual liberty and freedoms. These activities extend beyond mere unfair labour practices and unfair pay, as slavery violates fundamental human rights through coercion, threats, deception and physical control.

Modern slavery practices present a threat to fundamental human rights such as the right to dignity of human person and personal liberty.

SEC is committed to complying with the *Modern Slavery Act 2018 (Cth)* & the *Modern Slavery Act 2018 (NSW)*.

We also are committed to ethical business practices that will contribute to the stamping out of modern slavery in all its forms by implementing a zero-tolerance system towards modern slavery through our supply chains.

SEC's direct suppliers and subcontractors are usually based locally, with the remainder normally still being Australian operated businesses. As such, SEC's exposure to risk within our supply chain is regarded as minimal.

At SEC, we have made clear to our Employees, Subcontractors and Suppliers what the company's expectations and commitment are towards eliminating modern slavery in our operations and supply chain.

This statement has been prepared on behalf of SEC in accordance with the *Modern Slavery Act 2018 (Cth)* & the *Modern Slavery Act 2018 (NSW)*.

This Modern Slavery Statement has been approved by the Directors of Stephen Edwards Constructions Pty Ltd.

## MODERN SLAVERY POLICY

The Commonwealth Modern Slavery Act 2018 (the Act) and the Modern Slavery Act 2018 (NSW) recognises that modern slavery is prevalent around the world, and sets out steps to ensure Australia is not contributing to these crimes. Stephen Edwards Constructions (SEC) also recognises that modern slavery is a growing and complex problem and is committed to working in a collaborative approach with all our stakeholders in respecting and promoting human rights and eradicating modern slavery.

Our aims are to ensure that our supply chain achieves the following outcomes:

1. Our Suppliers and Subcontractors shall not use any type of:
  - Work or service extracted from any person under the menace of any penalty, which work has not been freely chosen by the person.
  - Work which is not for compensation received by the worker, but to repay a debt, which is often incurred by another person offering the worker's labour in exchange.
  - Work in which an employer forbids workers from leaving employment at the worker's discretion.
  - Child labour.
2. Our Suppliers and Subcontractors must:
  - Comply with all laws regulating hiring and employment, working hours, working conditions, wages, overtime compensation and legally mandated benefits.
  - Provide a safe and hygienic working environment that is without risk to health, taking into consideration knowledge of the relevant industry and any specific hazards.
  - Ensure all workers are employed based on their ability to do the job, not on the basis of personal characteristics, free from harassment and abuse.

To achieve the above aims, SEC will undertake the following:

- **Understanding SEC's Modern Slavery requirements**

SEC will provide staff training to ensure that Modern Slavery requirements are understood including how our systems and forms address Modern Slavery requirements.

  - All employees are required to actively participate in company training to understand the implications of this policy.
  - Training for new staff will occur during employee company inductions.
  - Auditing and further training will be implemented on a periodic basis.
- **Engagement of Subcontractor or Suppliers**

Ensure that the following items are completed as part of our procurement processes:

  - Conduct appropriate due diligence to ensure there are no Modern Slavery Practices in their operations or their supply chain
  - Include Modern slavery obligations within Subcontract Agreements and Purchase orders and ensure that Subcontractors and Suppliers undertake not to engage in any conduct or activity that involves or may give rise to, encourage or permit Modern Slavery as part of their engagement.
  - During the completion of a material supply or subcontract works



- **During the progress of a Supply Order or Subcontract Agreement**

Ensure that Subcontractors or Suppliers comply with the following:

- compliance with the nominated Modern Slavery Requirements in Orders and Subcontract Agreements
- provide to the Supplier all information requested by it in relation to such Modern Slavery Practices
- take all reasonable action requested by the Supplier or otherwise required to identify, assess, remediate and eliminate Modern Slavery Practices in their operations
- promptly notify the Supplier in writing of any Modern Slavery Practices they identify or suspect
- Work with SEC to take all reasonable action requested by the Supplier to address issues.

- **SEC commitments**

SEC will undertake all required action for compliance to State and Commonwealth legislation relating to Modern Slavery, including ;

- Implementation of this policy and related procedures
- Reporting of any known or suspected instances of Modern Slavery
- Commitment of Senior Management to the implementation of our Modern Slavery Policies, Procedures, and Processes
- Publishing of a Modern Slavery Statement in accordance with legislative requirements

We encourage all employees, visitors, or any other workplace participant to come forward with any concerns about Modern Slavery issues. Issues can be privately and confidentially identified by either:

- a) Emailing, calling or meeting with a Director in person.
- b) Anonymously – use the website to submit a comment via <http://www.stephenedwards.com.au/contact>



**Mathew Edwards**  
Director



## WHISTLEBLOWER POLICY

### Purpose

Stephen Edwards Constructions (SEC) is committed to promoting an ethical culture in which employees, subcontractors and clients are treated fairly. The purpose of this policy is to foster a 'speak up' culture which encourages the reporting of matters of significant wrongdoing and provides protections and measures so that those persons who make a report, do so confidentially and without fear of intimidation, disadvantage or reprisal in accordance with the Corporations Act 2001.

### Scope

This policy applies to:

- Employees
- SEC's Suppliers and Subcontractors
- Relatives and Dependants of the above

### Reportable Conduct

A whistleblower may make a disclosure under this policy if they have reasonable grounds to believe that a person who has business dealings with SEC has engaged in conduct (Reportable Conduct) which is:

- Illegal (such as theft, dealing in or use of illicit drugs, violence or threatened violence and criminal damage to property)
- A significant or serious threat to the health and safety of workers
- Associated with stealing or offering or accepting a bribe
- Associated with the leaking of confidential information to SEC's competitors, clients or any other person that may misuse this information
- Grossly negligent or unethical
- Misconduct or an improper state of affairs

Any disclosures that do not fall within the definition of Reportable Conduct, will not qualify for protection under the Act. It will be at the Company's discretion whether it considers there is a reasonable suspicion that the Reportable Conduct is occurring and/or whether the conduct constitutes "misconduct or improper state of affairs" under the Act.

For the avoidance of doubt, Reportable Conduct does not include personal work-related grievances. Examples of personal work-related grievances are as follows:

- Personal disputes between staff
- A decision relating to the engagement, termination, transfer or promotion of staff

Personal work-related grievances should be reported to a Manager, Division Head or a Director and will be investigated and addressed separately.

### Making a Disclosure

SEC encourages the disclosure of Reportable Conduct. Disclosures can be made verbally or in writing and at any time (including outside business hours), to the following people:

- Daniel Edwards (Director) on 0418 650 980 or [dewards@stephenedwards.com.au](mailto:dewards@stephenedwards.com.au)
- Mathew Edwards (Director) on 0425 209 533 or [medwards@stephenedwards.com.au](mailto:medwards@stephenedwards.com.au)
- David Cleary (Construction Manager) on 0425 289 440 or [dcleary@stephenedwards.com.au](mailto:dcleary@stephenedwards.com.au)





Disclosures should include as much information as possible, including the details of the misconduct, people involved, dates, locations and any other evidence that exists.

Disclosures can be made anonymously and will still be protected under the Corporations Act. It may be difficult to properly investigate the matters disclosed if a disclosure is submitted anonymously and therefore SEC encourages the discloser to share their identity, however they are not required to do so.

A discloser must not make a false or vexatious claim. Protections under this policy will not be applied to a false disclosure of vexatious claim. SEC may apply disciplinary proceedings in relation to a false disclosure or vexatious claim.

We strongly encourage disclosures to be made to SEC in the first instance, however you may choose to discuss your concerns with a legal practitioner for the purposes of obtaining legal advice or representation and you may also make a disclosure to the Australian Securities and Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA) in relation to a Reportable Conduct and be protected under the Act. A public interest and emergency disclosure can be made to a member of parliament or a qualified journalist and be protected, if the discloser:

- Has reasonable grounds to believe that the information concerns a **substantial and imminent danger** to the health or safety of one or more persons, or to the natural environment; and
- Has previously made a disclosure to SEC, at least 90 days has passed since making that disclosure and they have reasonable grounds to believe that action is not being taken to address the matter; and
- Has given written notification to SEC that they intend on making a public interest disclosure; and
- Has previously disclosed the information to ASIC or APRA; and
- Has reasonable grounds to believe that making a further disclosure to a journalist or member of parliament would be in the public interest; and
- No more information is disclosed than is reasonably necessary to inform the recipient of the substantial and imminent danger.

## Investigating Disclosures

The disclosure will be assessed to determine whether the matter falls under this policy. If the matter does not fall under this policy, the discloser will be notified on how the matter will be handled. If the matter falls under this policy, the discloser will be contacted to discuss the investigation process and any other matters that are relevant to the investigation. Where the discloser has chosen to remain anonymous, the investigation will be based on the information provided within the disclosure. The issues may also be referred to an external Authority if determined necessary by SEC.

The investigation will be conducted as follows:

- As soon as practicable after the disclosure has been made; and
- In an objective and fair manner, ensuring that every individual subject to the investigation is granted sufficient opportunity to reply to allegations before any findings are made

Issues identified within the investigation will be resolved or otherwise finalised. All relevant information will be saved in a secure electronic location and if requested, and to the extent permitted by law, the discloser will be updated during the investigation and informed of the outcome.



## Protections for Whistleblowers

SEC is committed to ensuring that any person who makes a disclosure is treated fairly and does not suffer detriment and that confidentiality is preserved in respect of all matters raised under this policy.

All information received from the discloser will be treated confidentially and sensitively. A discloser's identity (or any information which would likely lead to their identity) will only be shared if:

- The discloser gives their consent to share information; or
- The disclosure is allowed or required by law (for example where the concern is raised with SEC's lawyer for the purposes of obtaining legal advice); or
- The concern is reported to ASIC, APRA, ATO or AFP

Where it is necessary to disclose information for the effective investigation of the matter, and this is likely to lead to the discloser's identification, all reasonable steps will be taken to reduce the risk of the discloser being identified. SEC will also take the following measures for protecting identity:

- All paper and electronic documents and other materials relating to disclosures will be stored securely
- Access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the matter
- Communications and documents relating to the investigation of a disclosure will not be sent to an email address that can be accessed by other staff and all printing of investigation material will use security controlled

A discloser will be protected from Detrimental Conduct, including conduct such as the following:

- Termination or injury to employment (including remuneration impacts)
- Discrimination, harassment, bullying, intimidation or victimisation
- Harm or injury including psychological harm

The Corporations Act also protects a discloser against certain legal actions related to making a disclosure, including civil, criminal and administrative legal action. Any information the discloser provides will not be admissible in any criminal or civil proceedings other than for proceedings in respect of the falsity of the information or misconduct which the discloser was involved in.



**Mathew Edwards**  
Director



## **CORPORATE SOCIAL RESPONSIBILITY POLICY**

Stephen Edwards Constructions is committed to healthy ecosystems, social equity and good organizational governance. The company operates in a transparent and ethical manner, encouraged by management at all levels and in all business dealings. Stephen Edwards Constructions actively seeks to understand the impact of the organisations business decisions and activities on society and the environment.

The company's long-term reputation is paramount and valued over and above short-term economic gain. As such Stephen Edwards Constructions promotes an awareness of social responsibility, integration of progressive policy into all facets of the business and encourages socially responsible relationships in practice. Stephen Edwards Constructions seeks to:

- Uphold fundamental human rights and avoid discrimination of any form, avoiding complicity and supporting resolution of grievances.
- Engage in fair labour practices including equal opportunity employment, best practice work health and safety conditions and investment in staff development and training.
- Protect the environment and adopt practices that will assist in mitigating the effects of climate change, including sustainable use of resources and pollution minimisation.
- Conduct business with legitimate organisations that engage in fair operating practices and take their corporate responsibilities seriously.
- Value clients, consultants, subcontractors and suppliers by providing accurate marketing, quality service, support and avenues for performance feedback and improvement.
- Contribute to and promote sustainability within the supply chain.
- Contribute to positive community relations, local community involvement, welfare and development.



Mathew Edwards  
Director



## **INDUSTRIAL RELATIONS POLICY**

Stephen Edwards Constructions is committed to complying with Federal, State and Territory legislation, Regulations, Codes of Practice and other Guidelines and to meeting the requirements of the National Code of Practice for the Construction Industry in accordance with the National Code of Practice for the Construction Industry, and Implementation Guidelines For The National Code Of Practice - Construction (2013) and Implementation Guidelines to the New South Wales Code of Practice for Procurement: Building and Construction having in mind the obligations imposed by the:

- Industrial Relations Act (NSW) 1996;
- Workplace Relations Act (Cth) 1996 and amendments;
- Work Health and Safety Act 2011(NSW);
- Work Health and Safety Regulation 2017(NSW);
- Workers Compensation Act (NSW)1987 and amendments;
- Workers Compensations Regulation 2016
- Workplace Injury Management and Workers Compensation Act, (NSW) 1998 and amendments.
- The Building and Construction General On-site Award 2020

The success of our business is dependent on the capacity, commitments and productivity of our employees and subcontractors.

Our aim is to achieve a fair and equal workplace by:

- Ensuring all employees are treated with dignity and respect
- Maintaining open and effective relationships with employees and subcontractors to reduce the risk of delays due to industrial disputes
- Maintaining open and effective relationships with industry associations and regulatory authorities
- Maintaining a strong issue resolution practices and principles
- Maintaining the reform processes and work change practices designed to improve the relationship between employees and the management of Stephen Edwards Constructions
- Responding to any issues raised by employees or identified by supervisors or by any other member of management.
- Identifying the expectations of builders and principals in regard to industrial relations processes prior to entering into contracts with them
- Ensuring that any Enterprise Bargaining Agreement (EBA) or Australian Workplace Agreement (AWA) entered into provides productive quid-pro-quo benefits and bears no long-term negative implications for Stephen Edwards Constructions
- Cooperating with the safety management processes on the building and construction projects on which our workforce is deployed
- Holding briefing sessions for all employees as required, to report on the activities of the firm, to describe its expectations and to seek their views on ways to improve the performance of Stephen Edwards Constructions in all aspects of its operations
- Ensuring Subcontractors are aware that they may be contacted by the Construction Compliance Unit (CCU) at any time during the project
- Reporting all breaches of the Guidelines to the CCU within 24 hours of becoming aware of the breach

**All employees and subcontractors are charged with the responsibility of:**

- Complying with the terms of their industrial instruments and the law
- Respecting the principles of freedom of association at all Stephen Edwards Constructions workplaces

The goal of this policy is to enable a positive and productive work environment with the aim of maintaining long term employees with retained company knowledge.



Mathew Edwards  
Director



## **WORKPLACE BULLYING AND HARASSMENT POLICY**

Stephen Edwards Constructions (SEC) is committed to ensuring that all employees are treated fairly and equitably, and are provided with a work environment that is free from all forms of bullying and harassment.

Bullying is repeated, unreasonable behaviour directed towards a worker, or group of workers, that creates a risk to health and safety. Bullying can be physical, verbal or psychological.

Harassment refers to words or behaviours that threaten, intimidate, or demean a worker, or group of workers.

Bullying and Harassment may include:

- Verbal insult or abuse.
- Repetitive, overt, unwanted, or inappropriate attention of a physical, verbal, implied, or suggestive nature.
- Unwelcome sexual behaviour that causes a person to feel offended, humiliated or intimidated, where a reasonable person could have anticipated that reaction in the circumstances.
- Spreading of rumours, or private information whether true or untrue, that would be considered inappropriate, demeaning, or defamatory to a person's character or reputation.
- Personal attack, threat, intimidation and misuse of power.
- Deliberate exclusion or isolation from workplace activities.

SEC supports the dignity and self-esteem of every person. Bullying and harassment of any kind (including victimisation and vilification) will not be tolerated. SEC treats all reports seriously and encourages all employees to report workplace bullying.

SEC's management will ensure the following:

- Complaints are dealt with promptly and in accordance with the principles of natural justice.
- Confidentiality is maintained within the procedures for resolving complaints.
- Workers are aware of their reporting options.
- Disciplinary procedures may be invoked in the case of serious or persistent bullying or harassment.
- Victimisation as a result of a complaint will not be tolerated.
- The business continues to comply with all workplace legislation related to employee rights.

SEC will also ensure that all staff are informed of this policy and managers and other supervisory staff are aware of their responsibilities in accordance with this policy.

If you feel that you may be a victim of bullying or harassment, contact your immediate Manager, Infrastructure & Assets Manager or Daniel Edwards.



Mathew Edwards  
Director



## **EQUAL OPPORTUNITY POLICY**

Stephen Edwards Constructions (SEC) acknowledge the traditional stereotype and demographic of the workforce within the construction industry and the barriers that have existed which deter or prevent minority groups from pursuing construction as a viable career pathway.

SEC is committed to removing such barriers through:

- promoting equal opportunity in employment and delivery of our services in accordance with universal principles of equity, fairness and social justice
- providing opportunities where possible for Indigenous people and enterprises, and other under-represented groups to contribute to our building projects
- providing support to the needs of a diverse workforce and reasonable adjustments for individual requirements

This policy extends to and includes; people of all religions, ages and races including Aboriginal and Torres Straight Islanders, the LGBTQI+ community, individuals with personal, family, or medical needs, physical or mental handicaps, and any others with a heightened risk of discrimination within the workplace.

Our equal opportunity strategies include:

- celebrating our diverse workforce and encouraging open expression of self and individualism
- a continual improvement strategy that encourages anyone within our business, but particularly those with special needs to raise any issues experienced and suggestions for change
- pursuing projects through clients who require, favour, and reward businesses that promote freedom, diversity, inclusion, and the long-term needs of a harmonious Australian society
- Offering instruction and guidance to employees regarding equality, diversity, and the challenges faced by minority communities and individuals with specific personal requirements necessitating sensitivity and/or reasonable accommodations within the workplace
- ongoing monitoring to ensure that the business remains aware of its legislative framework relating to individual needs, particularly the requirements of the Fair Work Act & Regulations 2009
- ensuring that all SEC employees have access to benefits and services in an equitable manner, including assistance to reasonably accommodate a person's disability or personal needs
- providing inclusive corporate governance across the organisation, including our Workplace Gender Equality Strategy, ISLP and APP targets, and our Code of Conduct with associated policies relating to whistleblowing, bullying & harassment, and grievance management
- requiring all staff, employees, subcontractors and stakeholders ensure their conduct complies with the equity principles outlined in this policy

The effectiveness of this policy is to be periodically reviewed by the Directors.



Mathew Edwards  
Director



## **FRAUD AND CORRUPTION POLICY**

Stephen Edwards Constructions (SEC) is committed to creating and supporting a workplace culture that promotes fair and just ethical standards as set out in our Code of Conduct. Fraud is incompatible with this culture and presents a risk to the achievement of SEC's strategic objectives. We are committed to preventing, identifying and addressing all acts of fraud and corruption against our company. To achieve this, we will raise awareness of fraud risks and implement controls aimed at reducing the opportunity to commit fraud and that increase the likelihood of fraud being detected.

### **SCOPE OF POLICY AND PURPOSE**

This Policy applies to SEC's directors and employees and to all contractors working for or at SEC's sites.

This Policy establishes a common understanding of:

- what fraud is;
- how we prevent the risk of fraud;
- how we detect fraud; and
- the actions our people should take if they suspect fraudulent activity.

### **WHAT IS FRAUD?**

Fraud is dishonestly obtaining a benefit, or causing a loss, by deception or other means. The term 'fraud' refers to an intentional act by one or more individuals involving the use of deception to obtain an unjust or illegal advantage. The key element of fraud is dishonesty.

For the purposes of this Policy, 'fraud' includes attempted fraud and consists of but is not limited to the following:

#### **Asset Misappropriation - Cash**

- Theft of cash
- Theft of funds through electronic banking

#### **Asset Misappropriation – Non cash**

- Theft of plant and equipment, inventory or consumables
- Theft of intellectual property
- Disclosing confidential information to outside parties without authority for personal gain

#### **Asset Misappropriation – Insurance**

- False claim for workers compensation
- False claim for accidents or other claims

#### **Asset Misappropriation – Fraudulent Disbursements**

- Falsifying expense claims
- Corporate credit card misuse
- False invoicing
- Payroll falsification
- Forgery or alteration of any document



## **Corruption**

- Overcharging for goods and services
- Recording credits for goods and services provided and refunding for personal benefit
- Secret commissions (kickbacks received by employees)
- Acceptance of goods and services as inducement to giving work to any supplier
- Collusive bidding

## **Fraudulent Statements**

- False accounting
- Material and deliberate misstatement of accounting information
- Intentional statements of incorrect or misleading employment history / education qualifications.

## **HOW DO WE PREVENT FRAUD?**

A system of internal controls has been implemented to prevent fraud from occurring. Key fraud prevention controls include:

### **Upholding the standards of behaviour detailed within SEC's Code of Conduct.**

The Code provides a set of guiding principles to help our people make decisions in their day to day work to ensure that they maintain high ethical standards.

### **Compliance with the law and SEC's policies and procedures.**

SEC will at all times comply with relevant laws relating to the efficient and ethical handling of any alleged fraudulent activities and will implement appropriate procedures to facilitate effective outcomes.

### **SEC's risk management process.**

SEC has adopted the risk management process and principles of ISO 31000 as part of normal business practice. To prevent fraud from occurring, SEC identifies and evaluates internal and external fraud threats and implements preventative controls that mitigate or minimise significant fraud risks.

### **Fraud Vulnerability Survey.**

At regular intervals, SEC undertakes an organisation-wide risk assessment of its operational and strategic fraud risks which provides clarity and understanding around the full spectrum of fraud risks.

### **Review of Fraud Control Plan.**

Annually, SEC performs a review of its Fraud Control Plan including the confidential strategies with respect to the management of fraud, specific fraud management plans and timetables for ongoing operational and monitoring activities.

**Managers and Supervisors** employ sound fraud risk management practices within all activities for which they are responsible and ensure the effective operation of the following preventative controls:

- adequate separation of duties (more than one employee is involved in key tasks);
- proper authorisation procedures (transactions must be recommended and approved);
- physical security of attractive items; and
- independent monitoring and checking of data and documentation.





## HOW IS FRAUD DETECTED?

A system of internal controls has been implemented to detect fraud as soon as possible after it has occurred. Key fraud detection controls include:

- appropriate approval and authorisation processes;
- independent reconciliations;
- physical checks / stock-takes; and
- analysis of management accounting reports.

Financial Statements are audited at the end of each financial year by an external auditor.

## Investigation

An investigation of fraudulent activity will be undertaken by appropriately qualified parties depending on the matter and the content of the disclosure. The aim of the investigation of the fraudulent activity is to substantiate or refute the claims.

## Actions you should take if you suspect Fraudulent Activity.

If you see or suspect any fraudulent activity, you must report it immediately to:

- your Manager; or
- the most Senior person at your site.

Where this is not appropriate or you wish to remain anonymous, matters may be reported to the Financial Manager by the methods listed below:

Phone: 0418 650 980

Email: [dedwards@stephenedwards.com.au](mailto:dedwards@stephenedwards.com.au)

Mail: Daniel Edwards, 140 Wicks Rd, Macquarie Park 2113

Where a serious allegation has been made that could result in reprisals against the Discloser, the recipient of the information (such as the Manager or Senior Manager) must treat the disclosure confidentially and immediately report the disclosure to the Financial Manager, so that the information can be dealt with under the Protected Disclosure Procedure.

## Breaches

SEC takes any failure to comply with this Policy very seriously. In certain circumstances, a breach of this Policy could be referred to an appropriate authority for investigation. A number of consequences could flow from a breach, including termination of employment or contract and prosecution.

To help you comply with this Policy, we will:

- train you about this Policy and your obligations under relevant legislation, codes and guidelines; and
- provide adequate resources to manage and investigate breaches of this Policy.

## RESPONSIBILITIES AND AUTHORITIES



# Stephen Edwards

## **Staff and Contractors** must:

- perform their duties with honesty, integrity and in an ethical manner;
- if they see or suspect fraudulent activity, must report that suspected fraudulent activity immediately;
- comply with the Fraud Prevention Policy and Procedure; and
- notify their manager if they do not understand any part of the Fraud Prevention Policy and Procedure.

At any time, you are able to report conduct that is fraudulent to any Senior Manager.

## **Managers and Supervisors** must:

- promote sound fraud risk management practices within all activities for which they are responsible;
- ensure the effective operation of preventative and detection controls that minimise the opportunity for fraud in their area;
- make sure their employees and contractors know about the Fraud Prevention Policy and Procedure: and
- ensure the Policy and Procedures for preventing fraud are complied with.

## **REVIEW AND CONSULTATION**

This document is required to be review by the Directors, as a minimum, every two years.



Mathew Edwards  
Director



## **DISPUTE RESOLUTION POLICY**

Open communication and feedback are regarded as essential elements of a satisfying and productive work environment.

Stephen Edwards Constructions (SEC) encourages its employees to resolve any issues or concerns that they may have at the earliest opportunity with each other or, failing that, their immediate supervisor.

The preferred process involves employees resolving issues to their satisfaction internally, without feeling they have to refer to external organisations or to authorities for assistance.

SEC's Dispute Resolution Policy is governed by the principle that complaints and grievances must be dealt with in a timely manner and at the organisational level commensurate with an appropriate resolution.

All employees will have the right for a complaint to be heard through all levels of management if necessary and to feel that their complaints are treated seriously and addressed justly.

Employees have the right to raise concerns, complaints and disputes and to have the issue(s) considered and resolved, without fear of retribution.

SEC will make every effort to establish an atmosphere of trust, and open communication in order for all complaints to be dealt with in a constructive way. At all times SEC will ensure that its internal systems and structures promote justice and fairness.

Documentation will be kept of all concerns or complaints raised and the steps taken to resolve the complaint. All records will be kept confidential.

Complaints that arise from verbal, sexual, physical or emotional harassment are addressed separately in the company's Workplace Harassment & Bullying Policy.

SEC will ensure that all employees are informed of this policy and managers and other supervisory staff are aware of their responsibilities in accordance with this policy.



Mathew Edwards  
Director

