



Modern Slavery Statement

1 July 2021 to 30 June 2022

Modern Slavery Statement – Hazell Bros

This statement is made pursuant to section 13 of the Modern Slavery Act 2018 (Cth) in relation to the operations and supply chains of the entities within the RG&GR Hazell Group (“Hazell Bros”) for the period 1 July 2021 to 30 June 2022.

Hazell Bros has published a Modern Slavery Policy and the review of this policy is required as part of the corporate induction process.

Introduction

Founded in Tasmania in 1944, Hazell Bros is a diverse, family-owned and operated business. Hazell Bros purpose is to be the supplier of choice and work collaboratively in applying world class knowledge and experience to deliver the best products and services, while creating value for our customers and communities.

Hazell Bros vision is to be a respected and enduring business that empowers its people to deliver innovative solutions. Our ‘Safety First Always Works’ motto promotes a culture whereby employees return home from a day at work in the same condition as when they arrived.

At Hazell Bros, we recognise that respecting the human rights of those affected by our business activities is important and we are committed to acting ethically and with integrity in our business dealings to implement and enforce effective systems and controls to ensure risks associated with modern slavery are being appropriately managed.

Company Structure

Hazell Bros has thirteen operating entities (see Annexure A). A traditional parent/subsidiary structure does not exist; rather Hazell Bros takes the form of a conglomerate of entities that has been built up over a number of decades.

In most cases our main trading entity Hazell Bros Group Pty Ltd (ACN 088 345 804) undertakes procurement activities for the other trading entities. Based on this, Hazell Bros Group Pty Ltd will provide the statement on behalf of the other trading entities.

Operations

Operating across the construction, resources, industrial markets, asset services and transport sectors, Hazell Bros has a growing footprint across Tasmania, South Australia and Queensland, directly employing approximately 750 people. We value our people, and as an Employer of Choice for over 15-years, we are recognised for our positive people management culture.

Hazell Bros operates a federally accredited integrated management system that ensures that all trading entities, and employees, conduct business activities in line with policies and procedures contained in the system. Internal and external auditors review system compliance on a regular basis and report any non-conformances to the Board.

Hazell Bros has a number of policies and practices which reflect its commitment to act ethically, with integrity and transparency with regards to its employment practices, and to comply with applicable employment laws. These policies include:

- Overarching People Policy
- Employee Code of Conduct
- Equal Employment Opportunity

Hazell Bros also has a whistle-blower policy that encourages individuals to report any concerns they have with regards to breaches of policies and/or the law in relation to modern slavery practices or otherwise. To date, no reports have been received in relation to modern slavery.

Supply Chain

Hazell Bros currently procures goods and services from over 4,000 suppliers. Procurement activities are governed by the Procurement Policy and Procedure document.

In most cases, the supply chain presents a low risk of non-conformance with the Modern Slavery Act. A large portion of the Hazell Bros cost base relates to labour that is sourced locally and governed by Enterprise Agreements ('EAs') that are ratified by the Fair Work Commission, or salaried employees that are governed by common law employment contracts.

The points below present each Hazell Bros business unit and a summary of the supply chain requirements:

- *Civil construction – utilises locally sourced employees and contractors; utilises materials that have the potential to be manufactured by businesses based in other countries*
- *Quarry production – utilises locally sourced employees and contractors; outsourced drill and blast technicians; assets manufactured by businesses based in other countries*
- *Concrete manufacture – utilises locally sourced employees and contractors; aggregates supplied by the internal quarry business; cement powder supplied by plant based in Tasmania; additives manufactured locally; assets manufactured by businesses based in other countries*
- *Testing – utilises locally sourced technicians*
- *Plant hire – utilises locally sourced employees and contractors; assets manufactured by businesses based in other countries; fuel*
- *Industrial markets – utilises locally sourced employees and contractors; assets manufactured by businesses based in other countries*
- *Transport – utilises locally sourced employees and contractors; assets manufactured by businesses based in other countries; fuel*
- *Workshops – utilises locally sourced employees and contractors; assets manufactured by businesses based in other countries; parts and consumables manufactured by businesses based in other countries*
- *Corporate Services – utilises locally sourced labour and contractors; ICT equipment sourced by businesses based in other countries*

Based on the above, Hazell Bros has assessed the following segments of the supply chain as medium to high risk of non-compliance with the Modern Slavery Act based on manufacturing activities being undertaken in other countries:

- Civil construction materials
- Plant and equipment
- Concrete additives
- Workshop parts and consumables
- ICT hardware

- Fuel

Supply Chain Assessment

Hazell Bros randomly selected suppliers within the medium to high-risk segments noted on the previous page, to determine if a Modern Slavery Policy was in place and, where relevant, obtain confirmation that a Modern Slavery Statement had been submitted.

The summary below presents each suppliers assessment of compliance with the Modern Slavery Act based on disclosures made in the respective Modern Slavery Statements:

- Civil construction materials – no evidence of breaches of the Modern Slavery Act
- Plant and equipment – no evidence of breaches of the Modern Slavery Act
- Concrete additives – no evidence of breaches of the Modern Slavery Act
- Workshop parts and consumables – no evidence of breaches of the Modern Slavery Act
- ICT hardware – indicators of modern slavery identified
- Fuel – no evidence of breaches of the Modern Slavery Act

With regards to Hazell Bros key ICT hardware supplier, four critical findings were identified in the supply chain of which two relate to modern slavery. The supplier and a third-party expert are now working intensively with the down-stream supplier to mitigate the current risk profile.

The findings were as a result of an expansion in the monitoring process of new indirect services, and this provides comfort that the supplier is seeking continual improvement in this area.

Emerging risks

The current labour shortages impacting our industry have resulted in new strategies being implemented by Hazell Bros to attract talent. One of those strategies is exploring international recruitment markets.

Hazell Bros is cognisant of the fact that this increases the risk profile with regards to compliance with the Act therefore the following controls have been implemented to manage the risk profile:

- Engagement of reputable foreign employment advisor
- Completion of appropriate visa(s) to enable compliant employment
- Common law employment contracts that, at a minimum, match existing roles
- Verification of all qualifications

Next Steps in the Supply Chain Assessment process

Having gathered data from a section of key suppliers, Hazell Bros now intends to take steps to conduct a more expanded risk assessment by extending the coverage of supplier responses in a follow-up questionnaire requesting the following information:

- any relevant policies and procedures the supplier already has in place
- any known history of modern slavery or related practices
- whether the supplier employs vulnerable people and whether a supplier code of conduct has been implemented by the supplier and cascaded through its supply chains

Upon completion of the assessment process, if a supplier that is classified as 'high risk' fails to implement processes to mitigate the risk of modern slavery practices, Hazell Bros may cease dealing with the supplier until such time as remedial actions, such as the implementation of appropriate policies and procedures, are undertaken.

This project was due to be rolled out during FY22 however competing priorities has delayed rollout until Q3 FY23.

Assessing the Effectiveness of Actions

Modern Slavery issues remain complex with the risks, in most cases, sitting indirectly with suppliers rather than directly with the Hazell Bros business. The business is actively promoting awareness of the Act via promotion of the Modern Slavery Policy; this must be reviewed by all employees at least annually with compliance of this requirement monitored.

In assessing the effectiveness of the actions Hazell Bros have taken to assess and address modern slavery risks we report the following outcomes:

- The work undertaken around the assessment and monitoring of Hazell Bros suppliers has given the business a greater understanding of the supply chain members and how we can obtain the necessary comfort that they comply with the Act
- The volume of suppliers engaged results in a rolling compliance review based on the risk assessment for each business unit
- The business continues to increase its understanding of the Act and the actions required to mitigate compliance risks
- Suppliers are obliged to investigate, assess and address risks of non-compliance within their operations and supply chains
- In our capacity as a supplier, Hazell Bros readily agrees to comply with the Act and any reporting requirements of our customer base

Board approval

This statement has been approved by the Hazell Bros Board of Directors.

A handwritten signature in black ink, appearing to read 'Geoffrey Hazell', written in a cursive style.

Geoffrey Hazell
Managing Director
December 2022

Annexure A: Entities within the RG&GR Hazell Group:

- Hazell Bros Group Pty Ltd
- Hazell Bros Concrete Pty Ltd
- Clarke's Sands Pty Ltd
- Hazell Bros Cranes Pty Ltd
- HBMI Pty Ltd
- QualTech (TAS) Pty Ltd
- Hazell Bros (QLD) Pty Ltd
- Hazell Bros Plant Hire (QLD) Pty Ltd
- Hazell Bros Resources Pty Ltd
- Crossroads Civil Contracting Pty Ltd
- Kerblin Pty Ltd
- Hazell Bros Raeburn Quarry Pty Ltd
- Crossroads Concrete Pty Ltd