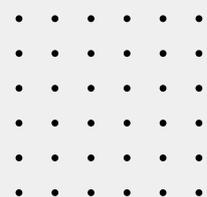
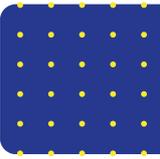


MODERN SLAVERY STATEMENT

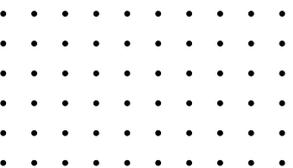
2023





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- 02 STRUCTURE, OPERATION AND SUPPLY CHAINS
- 03 IDENTIFYING THE RISKS
- 04 MITIGATING THE RISKS
- 05 MEASURING THE EFFECTIVENESS
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INTRODUCTION AND APPROVAL 01

This statement is produced to comply with the Modern Slavery Act 2018 (Cth) for the financial year ending 30 June 2023. It is prepared for Elsdon Pty Ltd as trustee for the Cays Family Trust trading as Cays Engineering ABN 49 613 977 502 and as a single reporting entity.

This Modern Slavery Statement was approved on the 14th of August, 2023, by Angus Youngson as the Sole Director and principal governing body of Elsdon Pty Ltd.



Cays Engineering believes all humans have a right to be treated with dignity and respect and is opposed to all forms of modern slavery and human trafficking. Cays Engineering acknowledges that modern slavery may impact its business and is committed to working towards reducing the risk that its operations might contribute to modern slavery.

A handwritten signature in black ink, appearing to be 'Angus Youngson'.

Angus Youngson
Managing Director
18/08/2023

STRUCTURE, OPERATIONS AND SUPPLY CHAINS

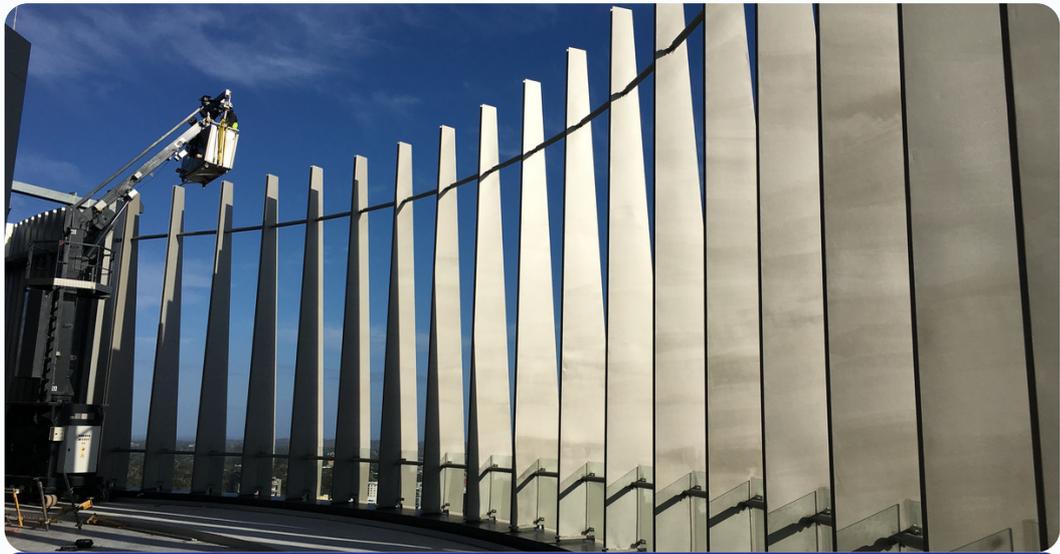
02



STRUCTURE

Cays Engineering was established in 1956 and is a family-owned and independent Australian business.

Cays Engineering's office and workshops are located at 17 Thornborough Road, Greenfields, Western Australia where it employs approximately 75 people all local to the region.



OPERATIONS

Cays Engineering provides specialist high-quality fabrication, project management and project construction services to the mining, oil and gas, chemical, power, construction and infrastructure industries throughout Western Australia.

Particular expertise has been developed in heavy plate and structural fabrication, mechanical fabrication as well as pipe work and pressure vessels.

SUPPLY CHAINS

The majority of suppliers Cays Engineering engages are local to Western Australia. Cays Engineering has developed strong long-term relationships with its suppliers in order to ensure quality, consistency and reliability of supply.

The main types of goods and services procured by Cays Engineering are steel, wear liners and labour hire.

The majority of steel is sourced from Australian mills with the balance originating from mills in China, South Korea, the United Arab Emirates, Thailand, New Zealand and Indonesia.

Wear liners are sourced locally but originate from Germany, Italy and China.



IDENTIFYING THE RISKS

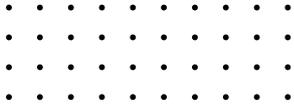
03

Cays Engineering has assessed its operations and supply chains to identify any risk factors for modern slavery practices that may be inadvertently incorporated into its business practices.

Operations

During the financial year ending 2023, the majority of Cays Engineering's workforce was employed directly and on employment contracts that met or exceeded the applicable employment legislation.

Whilst Cays Engineering has conducted pre-qualification assessments on the labour hire companies it engages to ensure appropriate work rights and pay rates are in place for all workers, Cays has less direct visibility and control over these workers and their employment terms. Cays recognises there are potential modern slavery issues within the third-party labour arrangements and the vulnerable populations, which may include excessive working hours, underpayment or non-payment.



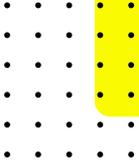
IDENTIFYING THE RISKS

Supply Chains

In the financial year ending 2023 the majority of Cays Engineering's procurement spend was in Australia. Australian suppliers are subject to compliance with Australian laws which do not allow slavery practices.

Suppliers that source parts / components internationally may have a heightened risk of modern slavery.

Cays Engineering has determined that the following goods and services that it utilises may represent a heightened risk of modern slavery:

- stationery supplies;
 - information and communication technology equipment;
 - workwear / uniform clothing;
 - plant and equipment;
 - migrant labour agencies.
- 
- 

MITIGATING THE RISKS

04

Cays Engineering has applied a risk management framework for the business to ensure it exercises due diligence in addressing risks identified in the areas of concern, and to enact mitigation measures which include:

- conducting modern slavery due diligence risk assessments to identify, prevent and mitigate modern slavery risks in our operations and supply chains;
- contractually requiring our subcontractors and suppliers to take reasonable steps to identify and address modern slavery risks;
- raising awareness of modern slavery risks, including the use of training tools and communications; and
- continuously improving organisational processes to tackle modern slavery risks.

MEASURING THE EFFECTIVENESS 05

This is the first Modern Slavery Statement for Cays Engineering and the Company is in the process of implementing procedures to further identify and address modern slavery risks within its operations and supply chain. As part of Cays Integrated Management system, the processes will be subject to management review and compliance audits.

Cays Engineering has not been notified of and is not aware of any modern slavery complaints against its operations and supply chains prior to or during the 2022/2023 financial year.



COMMUNICATION & CONSULTATION

06

Cays Engineering is a single reporting entity in accordance with the Act, so mandatory reporting criteria 6 is not applicable to Cays Engineering.

Cays Engineering acknowledges that the consultation and collaboration of all stakeholders (both internal and external) is integral to the management of modern slavery risks. Extensive consultation concerning modern slavery has occurred within the business. Cays Engineering will continue to consult with staff, suppliers and clients in an effort to identify and respond to modern slavery risks faced by the business.



CONTINUOUS IMPROVEMENT

07

Cays Engineering is committed to the continuous development and improvement of our policies and processes as they relate to modern slavery.

In the coming reporting period Cays will:

- continue to follow up on supplier assessments;
- introduce modern slavery assessment criteria within supplier compliance audits;
- commence development of a supplier code of conduct; and,
- continue the ongoing review and enhancement of its modern slavery prevention framework and associated policies and procedures.





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