



# MODERN SLAVERY STATEMENT.



FY 2023/24





# CONTENTS

INTRODUCTION	4
OUR STRUCTURE	5
SEE GROUP OPERATIONS	7
OUR SUPPLY CHAINS	10
UNDERSTANDING OUR MODERN SLAVERY RISKS	11
RISK MITIGATION ACTIONS	14
ASSESSING OUR EFFECTIVENESS	16
ACTIONS TAKEN IN THE LAST 12 MONTHS	17

# INTRODUCTION



SEE GROUP PARENT PTY LTD (SEE GROUP) IS AN AUSTRALIAN OWNED, FAMILY BUILT BUSINESS.

Our business has more than 36 years of success in the civil construction industry. SEE Group (being the parent company) comprises of a number of entities that contribute to its total annual consolidated revenue as at 30 June 2024.

SEE Group prides itself in its family-oriented culture which is reflected through “The SEE Way”.

SEE Group recognises that modern slavery is an ongoing challenge facing all businesses, including ours. We are committed to

progressing our approach to managing modern slavery risks and continue to work toward the elimination of modern slavery.

This statement has been prepared in consultation with each entity and has been approved by SEE Group’s Board. The process of consultation involved engagement with the Group’s Executive Leadership Team, our Audit and Risk Committee (ARC), our Sustainability Committee and input from the various relevant internal stakeholder teams including Finance, Commercial and Legal, and People and Culture.

This statement was approved by the SEE Group Parent Pty Ltd Board of Directors on 11<sup>th</sup> December 2024.

**Steve Turner**  
Managing Director  
11<sup>th</sup> December 2024

[ THE SEE WAY ]

## IT'S MORE THAN THE WAY WE DO THINGS. IT'S WHO WE ARE.

BOOTS AND ALL	We all pitch in to get the job done
OWN IT	We own our actions and take pride in what we do
ONE TEAM	We look after each other and value our relationships
FIND SOLUTIONS	We solve problems by being open to new ideas and embracing challenges

### WE ARE BOOTS ON AND READY TO GO

The way we do things and how we work with our clients, people, and entire network has been built over our 35-year history. Our unique approach and operational ethos have been shaped by our people, are owned by our people, and remain the very essence of what we proudly call The SEE Way.

**SEE** ▲ CIVIL

**SEE** ▲ FLEET

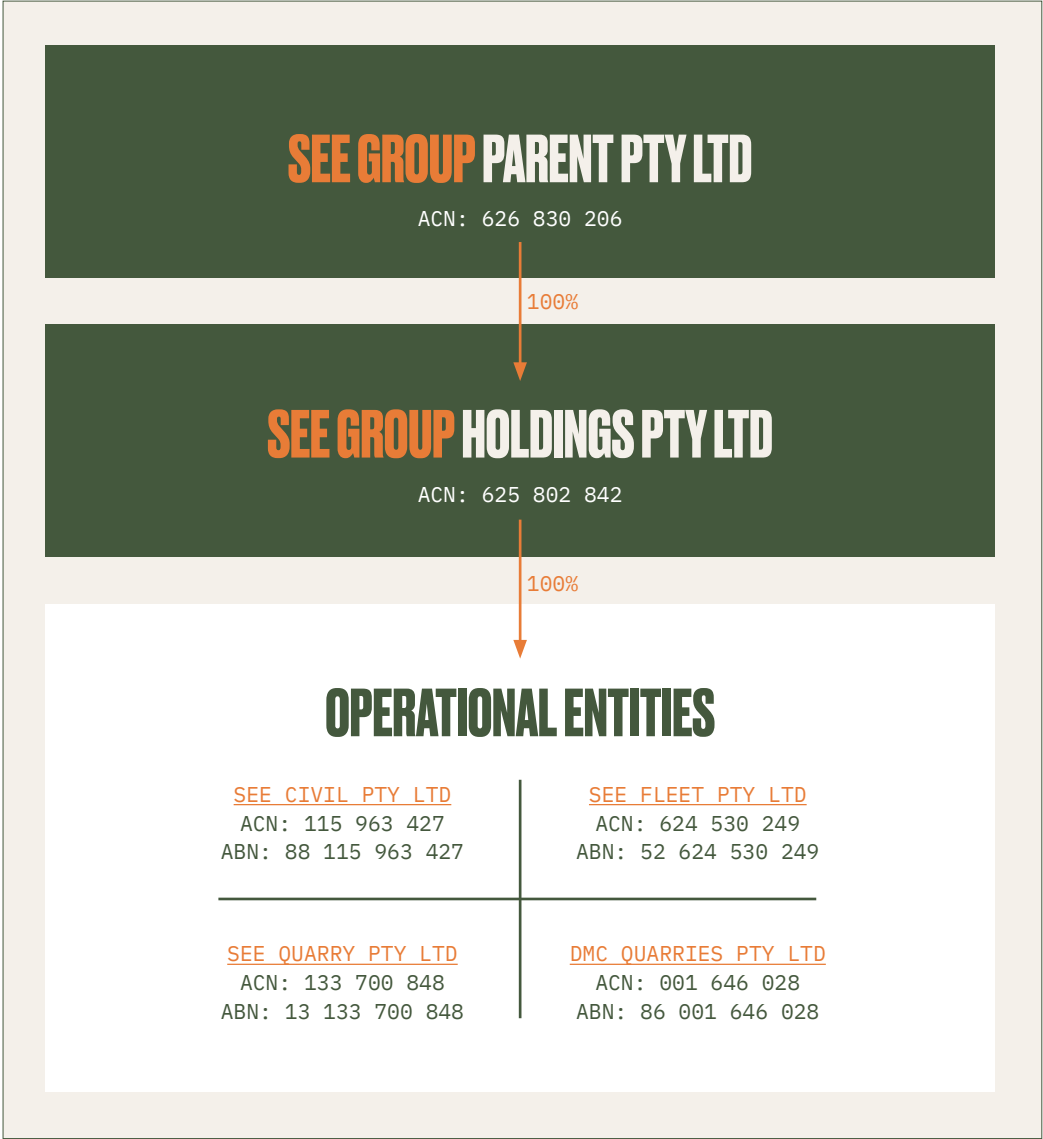
**SEE** ▲ MINING

# OUR STRUCTURE

SEE GROUP OPERATES AS A WHOLLY AUSTRALIAN OWNED CORPORATE GROUP WITH SEE GROUP PARENT PTY LTD AS ITS PARENT COMPANY.

Our reporting entities include SEE Group Holdings Pty Ltd and SEE Civil Pty Ltd. SEE Group Holdings and SEE Group Parent incorporate all of the Group’s operating activities, which include urban, infrastructure and resources civil infrastructure, wet and dry plant hire and quarrying operations.

SEE Civil delivers all civil works and is the group’s largest operating and employing entity.









# SEE GROUP OPERATIONS



**36**

PROJECTS  
COMPLETED

**\$197M**

CURRENT  
PORTFOLIO

**438**

TEAM  
MEMBERS

**\$51.8M**

HEAVY PLANT  
AND ASSETS



# SEE GROUP OPERATIONS

We comprise of two distinct workforces – our direct workforce, comprising our employees, and our indirect workforce, comprising our labour hire workforce.

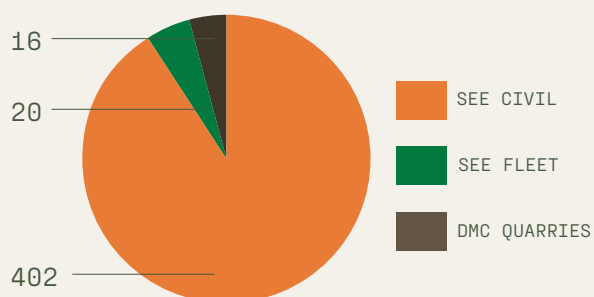
Approximately 438 team members are employed wholly within Australia and are based in Queensland, New South Wales and the Northern Territory.

We have visibility and control over the terms of employment and working conditions of our employees.

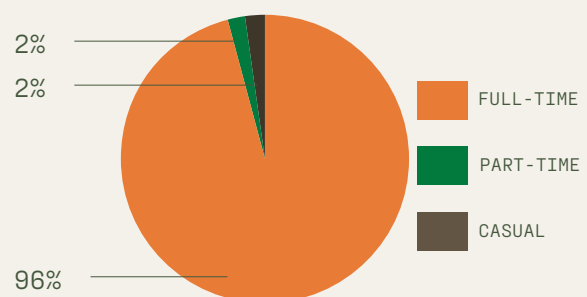
Our Employees are covered by two (2) enterprise agreements and five (5) Modern Awards. We have deemed the risk of modern slavery in our direct workforce as low.

We have strong policies and procedures, awareness, and training, as well as grievance reporting so our employees can be the eyes and ears of our broader networks.

SEE EMPLOYEES BY ENTITY



SEE EMPLOYEE MIX





# OUR OPERATIONS

WE COMMUNICATE OUR MODERN SLAVERY EXPECTATIONS AND COMMITMENTS VIA THE FOLLOWING POLICIES:

- Code of Conduct
- Anti-Bribery and Anti-Corruption
- Equal Opportunity
- Modern Slavery
- Whistleblower
- Workplace Health and Safety

These policies set out our expectations on how we expect our employees to behave, treat others, our commitment to obeying laws and regulations, physical

and psychological safety in the workplace, and channels and support to communicate breaches of these policies.

We monitor compliance in our direct workforce by verifying the right to work in Australia, age and qualifications of new employees on commencement, providing initial and ongoing training and awareness of all policies, and we regularly review pay calculations in accordance with the relevant award or instrument.

A portion of our workforce is filled by labour hire workers, who fulfill various roles

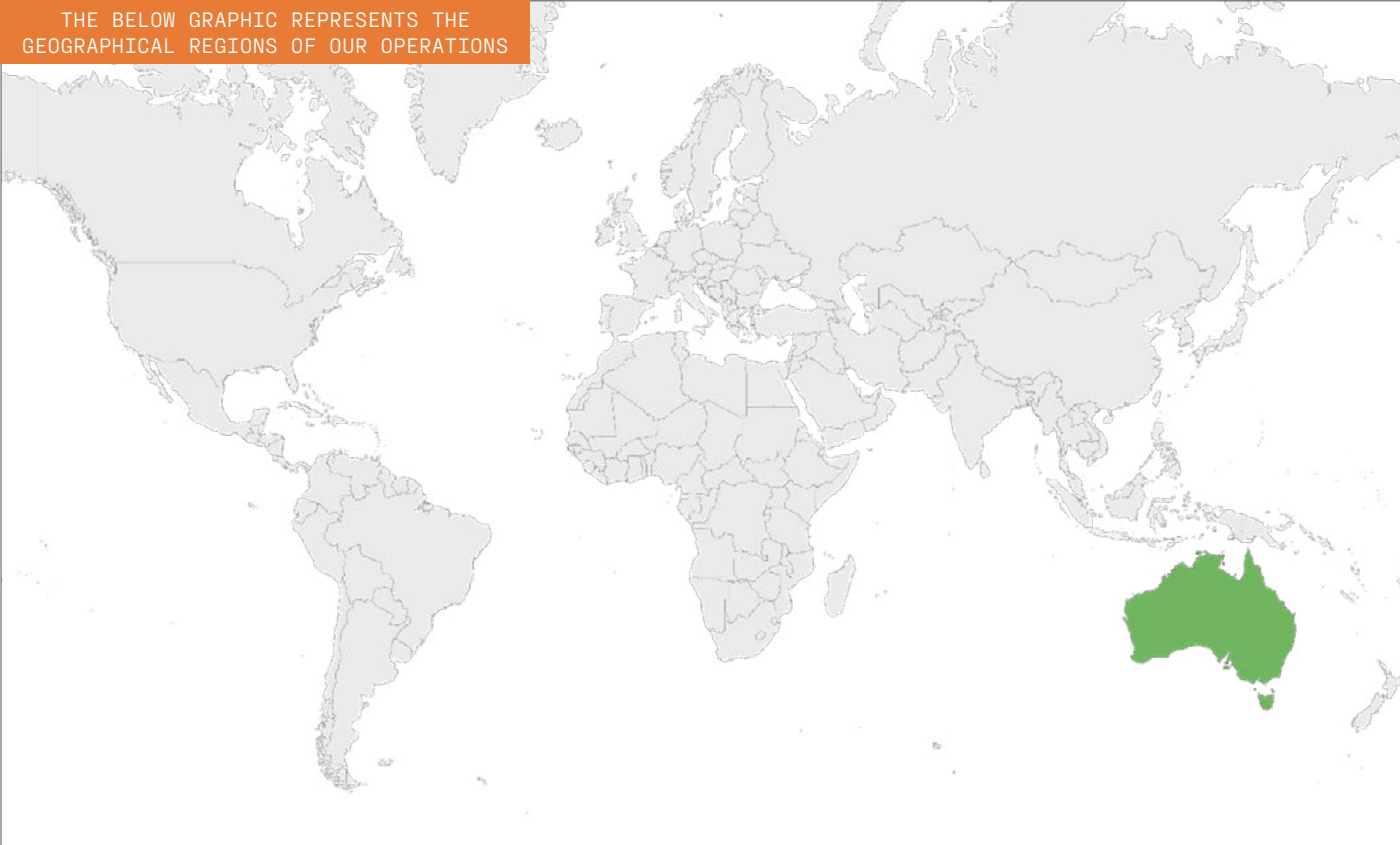
across our project sites. We have well-established, long-standing arrangements with several key organisations who provide additional staff to meet our operational requirements.

All of our labour hire is employed through Australian organisations that operate in Queensland and New South Wales.

Whilst we assess our modern slavery risk for our labour hire workforce, which we rate as low, we acknowledge we have less visibility and control over their employment terms and conditions. To mitigate

this risk we review actual pay rates and on-costs that make up the charge rate paid to our suppliers, as well as ensuring all Queensland suppliers hold a labour hire licence, as required under section 10 of the *Labour Hire Licensing Act 2017 (QLD)*.

THE BELOW GRAPHIC REPRESENTS THE GEOGRAPHICAL REGIONS OF OUR OPERATIONS



# OUR SUPPLY CHAINS

## SEE GROUP SEEKS TO ENGAGE WITH SUPPLIERS WHO INVOKE “THE SEE WAY” WITH ETHICAL AND SUSTAINABLE PRACTICES RELATING TO HUMAN RIGHTS AND THE ENVIRONMENT.

We have an emphasis on sourcing local supplies where a project is based and seek to encourage and support local economic prosperity.

Ultimately, we seek compliance with modern slavery legislation through due diligence of suppliers and consultants terms and conditions from the commencement of any commercial arrangement.

It is everyone’s role in SEE Group to identify modern slavery risks and report any concerns relating to modern slavery.

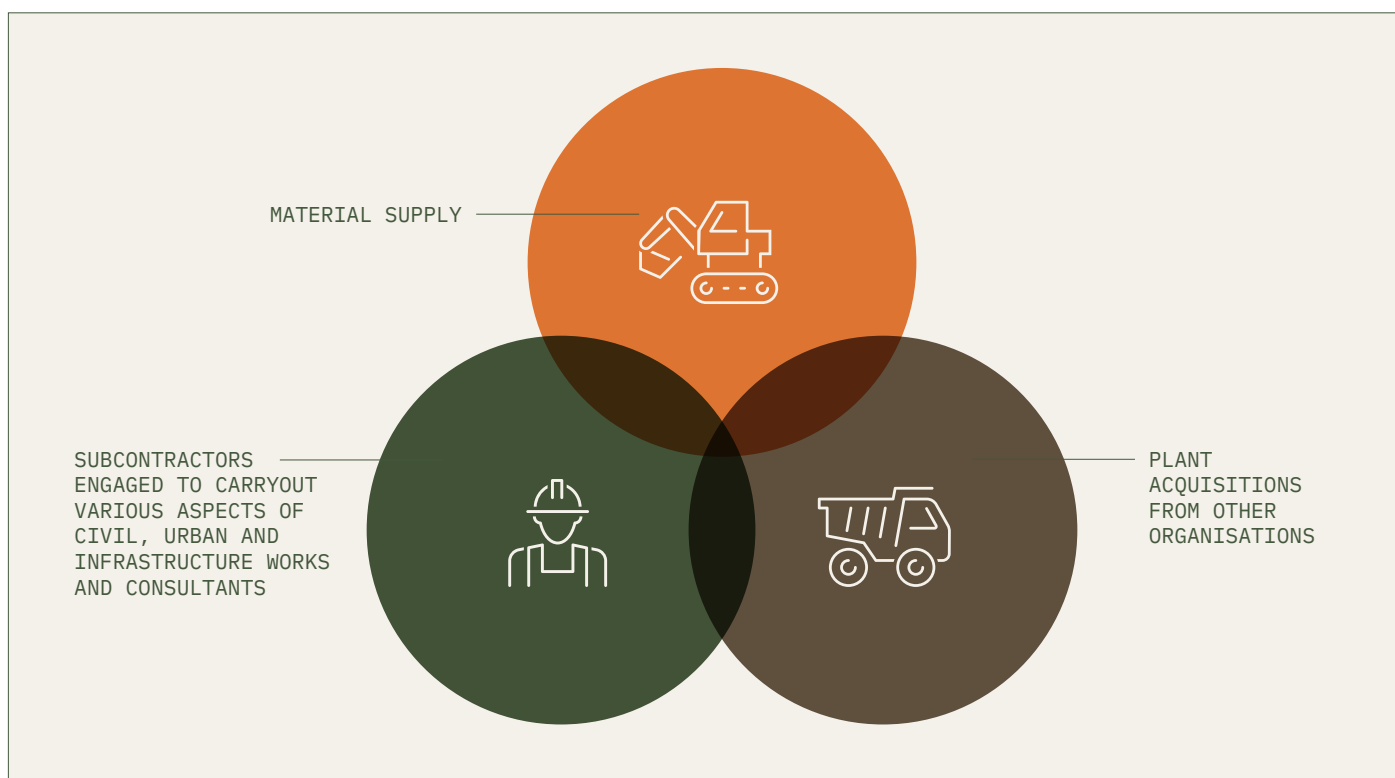
Our suppliers operate in the following sectors:

- Accommodation and food service cctivities
- Administration and support services
- Agriculture, forestry, and fishing
- Building services contractor
- Cleaning
- Construction
- Education
- Electricity, gas, steam and a/c supply
- Finance and insurance
- Government administration, Defence and social security
- Information and communication
- Labour hire
- Maintenance and repair of motor vehicles
- Manufacturing
- Mining and quarrying
- Professional and scientific services
- Retail
- Transportation and storage
- Water supply, sewerage and waste management

Our largest procurements in FY24 consisted of fuels and lubricants, asphalt, concrete

and aggregates, pipeline infrastructure, plant and equipment and labour hire. We engaged 1069 suppliers who were almost exclusively based in Australia, with a few select vendors located overseas. Procurement sourced outside of Australia included United Kingdom, USA, Israel, Germany, Hong Kong and New Zealand.

We acknowledge that each of our suppliers also have their own supply chains which highlights the importance and complexity around mitigating modern slavery risks







# UNDERSTANDING OUR MODERN SLAVERY RISKS

MODERN SLAVERY REFERS TO VARIOUS FORMS OF EXPLOITATION AND COERCIVE PRACTICES THAT DEPRIVE INDIVIDUALS OF THEIR FREEDOM, RIGHTS, AND DIGNITY.

It encompasses situations where individuals are forced or coerced into labour, servitude, or human trafficking against their will.

Modern slavery can take different forms, including forced labour, debt bondage, forced marriage, human trafficking, and child labour.

The International Labour Organisation estimates that over 50 million people around the world are victims of modern slavery.

In recent years, supply chain transparency is a key policy strategy used by governments to identify and prevent

business practices that lead to modern slavery.

SEE Group places respect for Human Rights at the forefront of its operations and supply chains and aims to embed practices that support these principles throughout the business.

Consequently, SEE Group endeavours to engage suppliers with similar ethics, values and practices pertaining to Human Rights.

SEE Group considers identifying modern slavery risks and practices of paramount importance to maintain safe, lawful and ethical business operations.

## RISKS OF MODERN SLAVERY IN SEE GROUP'S OPERATIONS

The risks associated to various suppliers is specific to the type of supply being

engaged and many factors contribute to this e.g. location, type of supplier, company size.

SEE Group has assessed the risk of modern slavery within the Group's operations as low impact. SEE Group has a comprehensive system of checks and procedures to ensure compliance with all legislative requirements across the workforce and suppliers it engages with.

## SEE GROUP'S SUPPLY CHAIN RISKS

Our suppliers operate, produce, and source across several/ different sectors. Some of these sectors can be described as high-risk. High-risk sectors are those in which human trafficking activities are known to occur and were identified in the Global Estimates of modern slavery and child











labour exploitation that were separately identified in Child Labour: Global Estimates 2020 Trends and the Road Forward (ILO and UNICEF, 2021).

The following graphics show the high-risk sectors of operation, production, and sourcing for our suppliers. The numbers in the following graphics describe how many suppliers are in the corresponding sectors.

## HIGH RISK SECTORS OF OPERATION

	Accommodation and Food Service Activities <b>1</b>		Building services contractor <b>1</b>
	Construction <b>17</b>		Labour hire <b>2</b>
	Maintenance and Repair of motor vehicles <b>4</b>		Manufacturing <b>5</b>
	Mining and Quarrying <b>8</b>		Transportation and storage <b>1</b>

## PRODUCTION OF GOODS IN HIGH RISK SECTORS

	Accommodation and Food Service Activities <b>1</b>		Agriculture, Forestry and Fishing <b>1</b>
	Building services contractor <b>1</b>		Cleaning <b>1</b>
	Construction <b>12</b>		Labour hire <b>1</b>
	Maintenance and Repair of motor vehicles <b>2</b>		Manufacturing <b>3</b>
	Mining and Quarrying <b>7</b>		Transportation and storage <b>1</b>

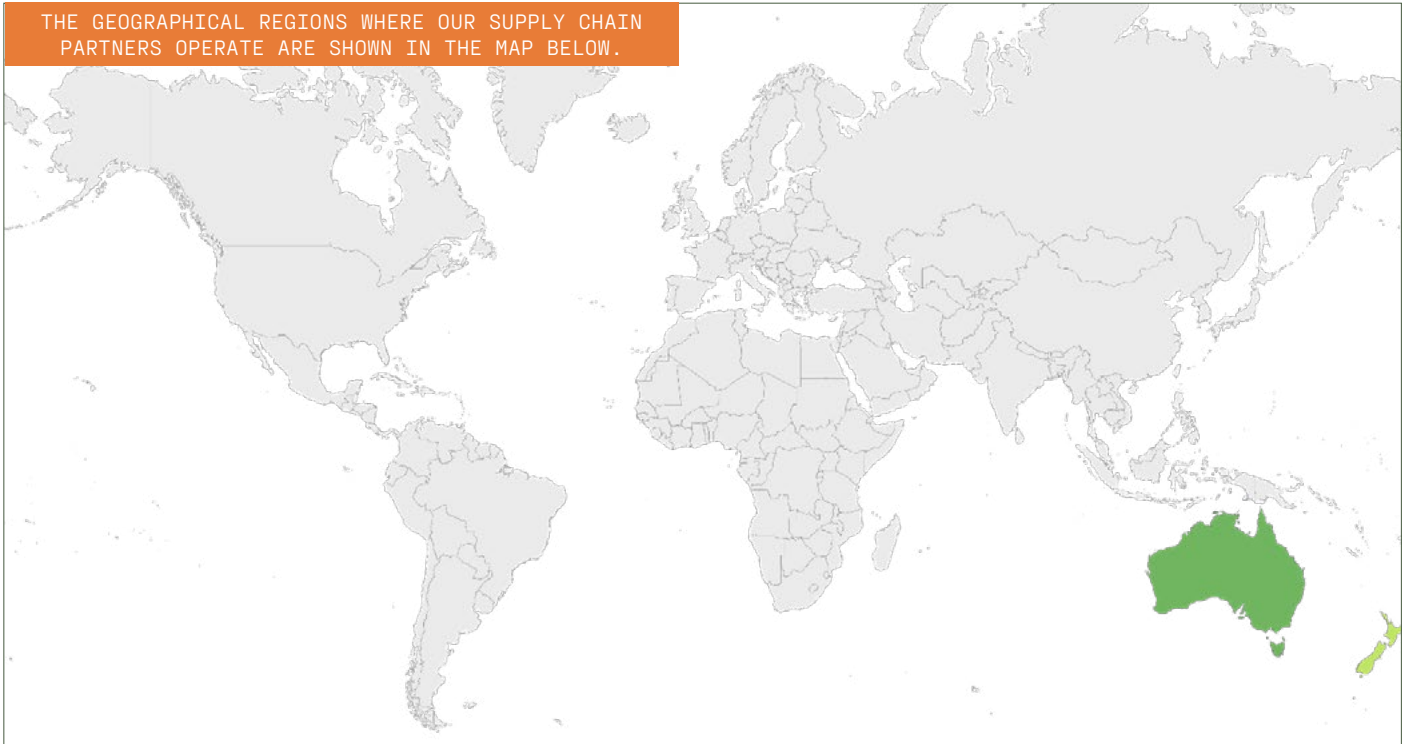


# SOURCING GOODS IN HIGH RISK SECTORS

 Accomodation and Food Service Activities 1	 Cleaning 1
 Construction 13	 Labour hire 3
 Maintenance and Repair of motor vehicles 7	 Manufacturing 6
 Mining and Quarrying 6	 Retail 1
 Transportation and storage 4	

Some countries or regions where our suppliers operate, as well as some goods produced and sourced by our suppliers, can be described as high-risk due to the possibility of a link to modern slavery practices such as Forced Labour, Human Trafficking,

Child Labour, and Debt Bondage. The geographical regions where our supply chain partners operate are shown in the map below.





# RISK MITIGATION ACTIONS

## ASSESS

SEE Group uses a third-party tool, the [iPRO Modern Slavery Assessment Tool](#) to assess modern slavery risks in our operations and supply chain. The risks identified in the previous section were all identified utilising this assessment tool.

We engaged iPRO during the reporting period to conduct assessments on our operations, and a bulk assessment of 49 of our suppliers. We intend to carry this process forward as an annual assessment of our operations and supply chain.

Participating suppliers were asked to complete a self-assessment questionnaire online. After each supplier completed and submitted the questionnaire,

their responses were assessed to determine their modern slavery risk scores and associated risk category.

Each supplier that completed the assessment was assigned one of the following risk categories:

- High-risk (high levels of inherent risk)
- High-risk (inadequate risk control)
- Medium-risk (partial risk control)
- Low-risk (adequate risk control)
- Low-risk (low levels of inherent risk)

To determine the appropriate risk category, responses were first evaluated for risks inherent to a supplier's operations, production, and sourcing. This is referred to as the Inherent Risk Score. The Inherent Risk Score was calculated based on the

geographical, type of goods, industry sector, and workforce parameters that the supplier indicated in the Modern Slavery Assessment Tool (MSAT).

Next, the Unmitigated Risk Score was evaluated. This score was calculated based on the policy and procedure responses on the questionnaire. A supplier's Unmitigated Risk Score determined whether they were categorised as having inadequate, partial, or adequate risk control.

Then, the risk scores for each assessed supplier were aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the overall supply chain.

## OTHER WAYS WE ARE ASSESSING MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

Through onboarding and SEE Group various due diligence is undertaken on a supplier including requirements to provide statutory declarations from suppliers on their current practices in their businesses so as to gain a greater understanding of their processes surrounding modern slavery.



# RISK MITIGATION ACTIONS

## ADDRESSED

We endeavour to engage with local services and products. This is part of our ongoing commitment to local communities to where our projects are located, to inject financial growth in that community. We educate new suppliers on modern slavery risks though their onboarding pack, and have made a commitment to commence obtaining modern slavery statements from our suppliers not required to produce their own. Raising awareness and setting our expectations on these risks will build our supplier capability and

ensures our supply chain understands our commitment to modern slavery. Other policies that mitigate modern slavery risks include the sustainability policy and our purchasing policy.

We have a particular focus on employing the skills of indigenous persons and businesses as part of the projects we deliver.

The below diagram demonstrates SEE Group’s current practices of ensuring Human Rights are at the forefront of what we do:

### REMEDIALTION

If the ARC receive a notice of a modern slavery incident it

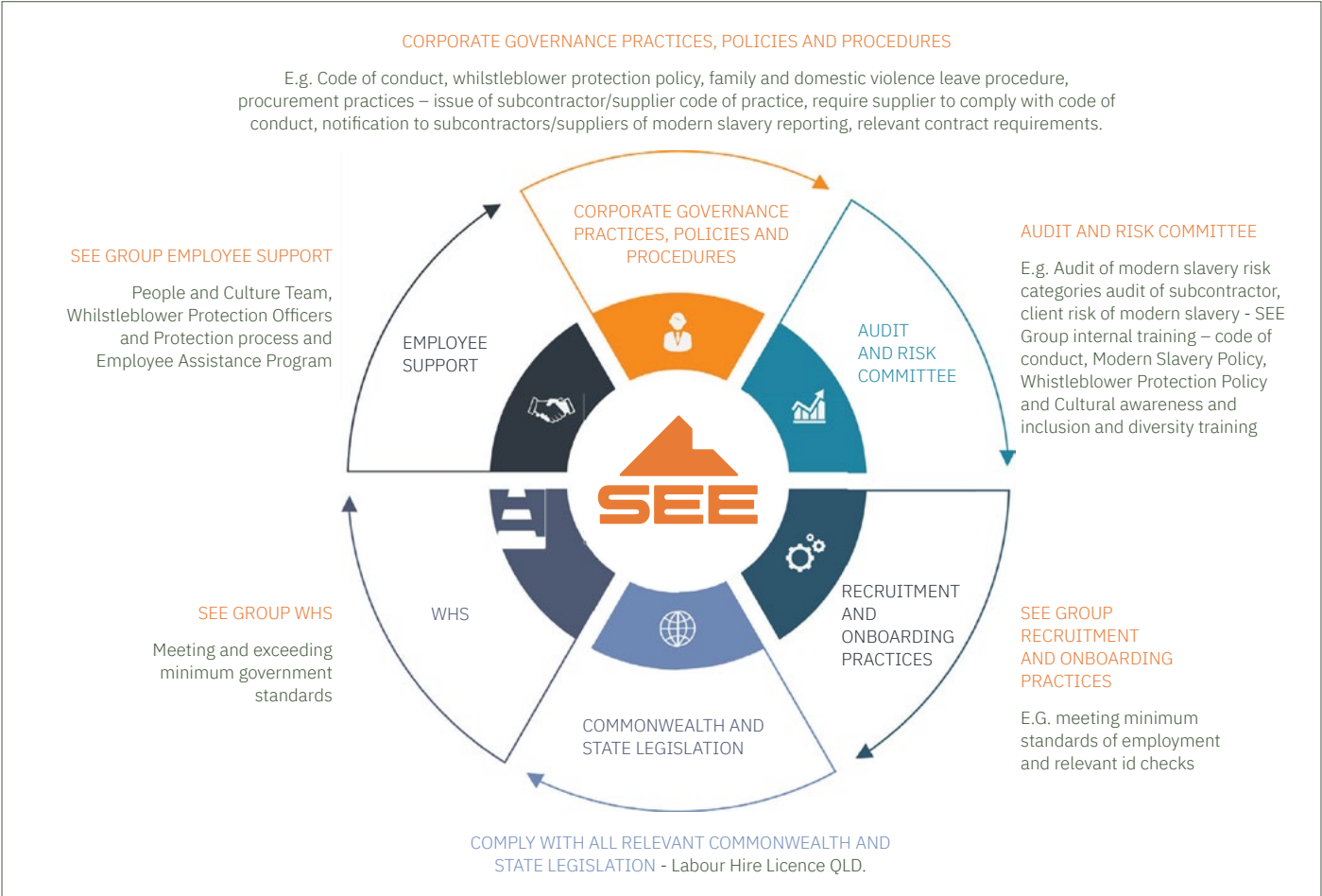
will meet to prepare a report for the SEE Group Board of Directors including potential remediation strategies. The main focus is to review and improve existing policies and procedures and provide further training to employees as well as further auditing and ceasing contracts with suppliers.

In addition to this, Suppliers that completed the Ipro Modern Slavery self-assessment were given action items to complete post-assessment. The action items provided to each supplier were based on their responses to the questionnaire, and if

implemented, will reduce the unmitigated risks identified during the assessment.

Action items were also aggregated, giving SEE Group Parent Pty Ltd a focused view of the most impactful actions that could be taken by suppliers across the supply chain.

We have started rolling out a supplier follow-up initiative to further discuss the action items and address the risks identified through the assessment. Primarily this involves ensuring that suppliers have the right policies and procedures in place to mitigate inherent risks in their business.



# ASSESSING OUR EFFECTIVENESS

We utilise the benchmarking and KPIs in the iPRO Modern Slavery Assessment Tool to assess the effectiveness of our actions.

AS THIS IS THE FIRST YEAR WE HAVE USED THE PLATFORM TO CONDUCT OUR ASSESSMENTS AND DUE DILIGENCE, WE WILL BE ABLE TO OBJECTIVELY MEASURE THE EFFECT WHEN THE ASSESSMENTS ARE COMPLETED DURING THE NEXT REPORTING PERIOD.

The main KPIs we are using to benchmark our efforts are the risk scores that are generated as part of the assessment process.

Each organisation who completed the assessment questionnaire was assessed and given two (2) risk scores.

- Inherent Risk Score
- Unmitigated Risk Score

The Inherent Risk Score measures modern slavery risks that are intrinsic/ built-in to the operations of an organisation. This is determined by asking which countries, regions, sectors, and high-risk goods are part of their operations, production, or supply chain.

The Unmitigated Risk Score measures the organisation's risk that is still present (remains) after accounting for modern slavery risk controls that have been implemented. This is determined by asking suppliers about the policies, processes, and procedures in place to reduce modern slavery risks.

SEE Group Parent Pty Ltd is provided an aggregated risk score of all the assessed suppliers, and we use this aggregated score to measure the risk on an overall supply chain level.

We aim to continuously improve on these KPIs.

As we take actions within our organisation, and with our suppliers, we will be able to assess the effectiveness of our modern slavery action plan to reduce the Unmitigated Risk Score by introducing relevant policies and procedures.

We also measure the effectiveness of our engagement with suppliers and will continue to encourage participation in our assessment programme to better identify and mitigate modern slavery risks in our supply chain.

## OTHER WAYS SEE GROUP ASSESSES ITS EFFECTIVENESS

- SEE Group actively engages with its suppliers to determine whether they are compliant with our standards. If an area of concern is identified with a supplier, we proactively engage in positive dialogue in order to educate and then remedy any failure of our policies and Code of Conduct.
- SEE Group's actions of a comprehensive onboarding process and contractual terms requiring suppliers to comply with legislative obligations including those relevant to eliminating modern slavery and SEE's policies and procedures appear to have been effective in minimising the risk of modern slavery within the main areas of SEE Group's direct supply chain.
- SEE Group's Audit and Risk Committee supports the Board to monitor the financial performance and disclosures of SEE Group, as well as compliance with all applicable laws and regulations, including our modern slavery reporting. The Audit and Risk Committee also oversees the framework for, and the reporting of, risks including enterprise, project procurement and delivery risks. The project risks include those relating to modern slavery and other procurement activities.
- The Group's modern slavery risk management approach is approved annually and by the Board of Directors.
- We have identified no breaches of our policies this year.



# ACTIONS TAKEN IN THE LAST 12 MONTHS

SEE Group now include in their contracts with suppliers additional obligations pertaining to the modern slavery legislation.

SEE Group now include in their contracts with suppliers additional obligations pertaining to the modern slavery legislation. This includes a requirement by the supplier to sign a Statutory Declaration confirming that they currently comply and will continue to comply with the modern slavery legislation and that their suppliers to whom they engage are, to the best of their knowledge, also compliant with this legislation. In addition to this we now implemented the software programme iPRO to target our major suppliers and drill down on what their modern slavery practices are in their businesses.

The Audit and Risk Committee are continuing to review existing policies and training to provide for general modern slavery risk and processes to ensure SEE Group and it's suppliers continue to manage the risks associated with modern slavery.

Additional due diligence checks have been put in place at the time of procurement to audit new suppliers and subcontractor so as to ensure that they re compliant with the Modern Slavery Legislation.

A Sustainability Committee has been formed to review the effectiveness of initiatives so as to strengthen supply chain transparency and traceability, thereby reducing the risk of modern slavery.

The Audit and Risk Committee will continue to meet regularly to monitor and mitigate any potential modern slavery risks with suppliers and report to the Managing Director of any concerns that may arise.





# CONSTRUCTING THE FUTURE ON THE STRENGTH OF OUR PAST.

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