



# Modern Slavery & Human Trafficking Statement 2025

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Underground Construction Alliance Pty Ltd (ABN: 14 630 411 424)  
Reporting period: 1 July 2024 – 30 June 2025

## Introduction

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Modern slavery remains a serious global human rights issue, affecting millions of people through forced labour, debt bondage, human trafficking, deceptive recruitment practices, and other forms of exploitation. Businesses operating in construction, mining, and infrastructure supply chains face particular exposure to modern slavery risks due to complex subcontracting arrangements and the sourcing of materials and labour across multiple jurisdictions.

Underground Construction Alliance Pty Ltd ("UCA") (ABN: 14 630 411 424) maintains a zero-tolerance approach to modern slavery and human trafficking. We are committed to identifying, assessing, and mitigating risks within our operations and supply chains and to acting ethically and responsibly where risks are identified.

This statement outlines the actions taken by UCA during the financial year 1 July 2024 to 30 June 2025 to address modern slavery risks in accordance with the Modern Slavery Act 2018 (Cth).

## Governance and Oversight

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Oversight of modern slavery risk remains embedded within UCA's governance framework.

During FY2025:

- The UCA Board reviewed modern slavery risk and compliance performance quarterly.
- Senior management received biannual reporting on supplier risk assessments and due diligence outcomes.
- The Modern Slavery Working Group continued to coordinate implementation across procurement, legal, human resources, and operations.
- Modern slavery risk considerations were formally integrated into enterprise risk management reporting.
- UCA consulted with its alliance partners in the preparation of this statement to ensure alignment of modern slavery risk management practices.

Accountability for modern slavery risk sits with senior leadership, with operational responsibility managed through the procurement and commercial functions.

## Our Business and Supply Chains

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UCA is an Australian-based contractor delivering integrated underground construction solutions across infrastructure, mining and resources sectors in metropolitan, regional, and remote locations within Australia.

For the period, the vast majority of UCA's work was undertaken within Australia across its core sectors. UCA's clients were Australian-registered businesses and were therefore also subject to the Australian Modern Slavery Act 2018 (Cth).

We operate primarily within Australia, with projects requiring engagement of the following subcontracted services:

- Subcontract labour providers
- Equipment suppliers
- Civil, structural, mechanical, piping, electrical and instrumentation contractors
- Fabrication and material suppliers
- Logistics and plant hire providers

Supplier selection considers both quantitative factors, including price, quality, and lead times, and qualitative factors such as values alignment, ethical sourcing practices, labour standards, and capacity.

We continue to prioritise engagement of local suppliers and Australian-based contractors wherever reasonably practicable, which reduces exposure to high-risk jurisdictions.

To support ethical and transparent operations, UCA maintains ISO-certified management systems for Quality (ISO 9001:2015), Environmental Management (ISO 14001:2015), and Occupational Health and Safety (ISO 45001:2018). Supplier due diligence includes consideration of compliance history, safety performance, business conduct, and sourcing practices.

Our alliance partners – AWCON, M2P Engineering and PHE Group – maintain aligned ethical standards and are expected to uphold equivalent modern slavery commitments.

To date, there have been no reported incidents of modern slavery identified within UCA's operations or supply chains, and the business remains proactive in monitoring and upholding high standards of conduct among its partners.

## **Consultation with Alliance Partners**

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UCA does not own or control any subsidiary entities. In preparing this statement, UCA consulted with its alliance partners through a structured review process. This included exchange of modern slavery policy documentation, participation in working group discussions, and review of this statement prior to finalisation. The process confirmed alignment of modern slavery risk management practices and commitments across the alliance.

## **Modern Slavery Risk Assessment**

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During FY2025, UCA continued its structured risk assessment program.

Risk identification considered:

- Country risk (including reference to the Global Slavery Index and DFAT guidance)
- Industry and sector risk (particularly construction, labour hire, fabrication and material sourcing)

- Workforce vulnerability (including temporary labour, migrant labour and subcontracted workforces)
- Supply chain tiering and visibility
- Media and civil society reporting

### **Key Risk Areas Identified**

While UCA's direct workforce operates under Australian employment laws, inherent risk exists within:

- Labour hire and subcontracting arrangements
- Offshore manufacturing of materials and components
- Lower-tier suppliers not directly contracted by UCA
- Procurement of imported goods used in construction works

No confirmed instances of modern slavery were identified within UCA's operations or direct suppliers during FY2025.

## **Policies and Internal Controls**

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UCA maintains the following core policies to address modern slavery risk:

### **Modern Slavery Policy**

Outlines UCA's commitment to ethical labour practices and responsible supply chain management.

### **Code of Conduct**

Outlines ethical expectations for employees and contractors, including compliance with labour laws and human rights standards.

### **Whistleblower Policy**

Provides confidential and protected channels for reporting misconduct, including modern slavery concerns.

### **Purchasing & Supplier Code**

Supplier contracts require compliance with all applicable labour laws and explicitly prohibit forced labour, servitude, debt bondage, or human trafficking.

### **Grievance Mechanism**

Employees and suppliers can report concerns anonymously without fear of retaliation. All reports are investigated promptly and independently where required.

In FY2025, these policies were reviewed to ensure alignment with evolving regulatory expectations and industry best practice.

## Supplier Due Diligence

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UCA applies a risk-based approach to supplier due diligence.

During FY2025:

- All new suppliers were screened through a compliance and risk review process.
- Higher-risk suppliers were required to complete enhanced due diligence questionnaires.
- Modern slavery clauses were incorporated into standard supplier contracts.
- Supplier declarations were reconfirmed where contracts were renewed.

Suppliers are required to certify that:

- Employment is freely chosen
- Workers may terminate employment voluntarily
- Wages are paid in accordance with legal requirements
- No worker is required to lodge deposits or surrender identity documents
- Recruitment practices are lawful and transparent

Where risks are identified, corrective action plans are required and monitored. In the event that a worker within UCA's supply chain is identified as a victim of modern slavery, UCA is committed to supporting access to appropriate referral pathways, including relevant support services and, where required, law enforcement or legal assistance.

## Training and Awareness

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UCA recognises that awareness is critical to prevention.

During FY2025:

- Mandatory modern slavery training remained in place for all staff.
- Targeted briefings were delivered to procurement and commercial teams.
- Refresher communications were issued to site-based leadership.
- Modern slavery indicators were incorporated into site mobilisation briefings.

Training content continues to be reviewed annually to reflect legislative and industry developments.

## Measuring Effectiveness

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UCA monitors effectiveness through measurable indicators, including: percentage of employees completing mandatory training; percentage of active suppliers subject to screening; number of supplier contracts incorporating modern slavery clauses; number of reported concerns; and internal audit findings related to labour practices.

Indicator	FY2025 Result
Staff completing mandatory training	100%
New suppliers subject to compliance screening	100%
Modern slavery reports via grievance channels	None received
Substantiated incidents of modern slavery identified	None identified

## Continuous Improvement

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In FY2026, UCA will:

- Increase supply chain mapping beyond Tier 1 suppliers.
- Introduce periodic supplier re-assessments based on risk profile.
- Expand training to include scenario-based risk recognition.
- Strengthen data capture to improve KPI reporting.
- Continue aligning our practices with evolving Australian regulatory expectations.

Modern slavery risk management is an ongoing process requiring vigilance, transparency and continuous refinement.

## Approval

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This statement covers the reporting period 1 July 2024 to 30 June 2025 and has been approved by the Board of Underground Construction Alliance Pty Ltd.



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**Mark Hogan**  
Director, Underground Construction Alliance

10/04/2026

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**Date**