

Modern Slavery Statement

Crisp Bros. & Haywards Pty Ltd

Approved on the 4th of March 2025 by the Board of Directors

Modern Slavery Statement

At Crisp Bros. & Haywards Pty Ltd, we are committed to upholding the highest standards of ethical conduct and human rights in our operations and supply chains. This statement outlines our commitment to preventing modern slavery and human trafficking in all aspects of our business activities.

The purpose of this statement is to outline our approach in relation to respecting human rights and to ensure our business has robust processes in place to minimise the risk of modern slavery within our own operations and associated supply chain. Our key focus areas are to ensure:

- Modern slavery principles are communicated to our relevant staff and key suppliers;
- Our policies and contractual arrangements contain relevant control measures;
- We comply with the Australian Government reporting requirements, stipulated within the
- Modern Slavery Act.

We have a zero tolerance to modern slavery and will make every effort to ensure we always contribute positively to the eradication of slavery, servitude, forced/child labour, and human trafficking.

This statement was approved by our Board of Directors on the 4th of March 2024.

Company Introduction

Crisp Bros. & Haywards Pty Ltd is one of Australia's leading steel fabrication and engineering companies with four (4) operational workshops around Tasmania with employment of approximately 290 persons. Our passion is providing our clients with quality fabrication and construction service through our highly skilled workforce in a secure and safe environment.

Our team of highly skilled and professional staff is committed to delivering quality engineering, fabrication and construction. We are dedicated to continuous improvement and growth and doing our utmost to meet every client requirement. We are committed to excellence and exceeding industry standards through innovation, project management as well as employee achievement.

Crisp Bros. & Haywards Pty Ltd has successfully completed major projects throughout Australia and overseas. Our success is a direct result of our staff's professional approach and determination to provide personal customer service, no matter the size of the project at hand. Our objective is to ensure you are satisfied with the product we help create with no limitations on how large or small the project is.

Our works capabilities include steel fabrication, engineering and site construction, conveyor systems, ship loaders, wind towers, bridges, structural steelwork, pipework, platework structures, tanks, bins, hoppers, equipment installation and mechanical works.

Crisp Bros. & Haywards Pty Ltd Modern Slavery Statement is in accordance with the Modern Slavery Act 2018 (No. 153, 2018).

Company Structure and Operations

Crisp Bros. & Haywards Pty Ltd (ABN 88 009 483 694) (ACN 009 483 694) is an Australian Proprietary Company limited by shares. We are a successful business, owned and operated by a team of passionate shareholders and managers, who in turn also manage the business on a day-to-day basis, which contributes to our success, ethics and principles.

Crisp Bros. & Haywards Pty Ltd registered office is located at 1 Boral Road, Western Junction TAS 7212 and operates from four (4) offices based around Tasmania with full operational workshops:

CRISP BROS.
160 Hobart Road, Kings Meadows TAS 7249
HAYWARDS WESTERN JUNCTION
1 Boral Road, Western Junction TAS 7212
HAYWARDS WYNYARD
2 Calder Road, Wynyard TAS 7325
HAYWARDS MARGATE
30 Waterworth Drive, Margate TAS 7054

Supply Chain

Crisp Bros. & Haywards Pty Ltd ensures to the best of our ability that there is no modern slavery in any part of our business operations. We are committed to acting ethically and with integrity in all business dealings and relationships, and where possible, to ensure modern slavery is not taking place in our own business or our supply chain.

We believe our greatest risk of involvement in modern slavery arises from our relationships with supply chain. As a result, our framework for addressing modern slavery primarily focuses on our engagement and influence with direct suppliers.

Our business also expects its service providers, suppliers, and contractors to share our commitment to act lawfully and ethically and to work to ensure that modern slavery is not taking place within its organisation or within its supply chain.

Crisp Bros. & Haywards Pty Ltd has maintained long-term, trusting relationships with our suppliers and subcontractors who in turn have strong reputations and ethics within their business operations. The selection of our suppliers is in accordance with relevant OH&S and Quality Assurance standards.

Our supplier due diligence includes:

1. Engage with formal suppliers and subcontractors with an identifiable and distinct legitimate business entity.
2. Contracts and orders are placed with Australian companies wherever possible, ensuring reputable products and brands. Preference is given to Australian Manufacturers.
3. Should imported products be within the supply chain, the Procurement Team, are aware of the country of origin. Thus, these suppliers may require a more detailed risk assessment before engaging in further business including input from Senior Management.
4. Understanding the warning signs within supply chains which may include purchasing products that are reduced in material traceability, unusual material invoicing, sham contracting and unrealistic lead times in work schedules.
5. Performing risk assessments on engaged suppliers and subcontractors ensuring no connections or dealings with modern slavery, unethical hiring practices or behaviour.
6. Evaluation of our suppliers and subcontractors with the use of CBH QMS F 0603 Supplier Evaluation Form.

7. Approved suppliers and subcontractors will be added to CBH QMS F 0604 Supplier Register.
8. Implementing strategies to counter modern slavery by fostering a culture that encourages Managers and Supervisors to informally speak with employees if they are experiencing coercion, exploitation, harassment, or bullying.

Risk Management

Crisp Bros. & Haywards Pty Ltd has a risk management approach that guides the identification, assessment, and mitigation of enterprise and operational risk. Crisp Bros. & Haywards Board provides ultimate oversight of Crisp Bros. & Haywards Risk Management framework and systems of internal control, which included management of Modern Slavery risks. As part of that framework Crisp Bros. & Haywards regularly undertake a review of the potential risks associated with modern slavery practices across our business and supply chain via the following action-based approach:

Key Actions	Overview
Determine	Administration Manager drafted this statement and policy and ensured that the Board of Directors as well as the Senior Management team at all levels were aware of the act and the statement/policy requirements.
Identify	The above working group identified key risks that may require communication to all working groups and any required reviews of processes and policies.
Assess	The working group measured those potential risks against current control methods to identify opportunities for improvements or new actions that required implementation.
Develop and execute	Modify policies, processes, and procedures. Update any required supplier agreements. Engage key suppliers based on risk level. Build relevant staff awareness of changes.
Reporting	Administration Manager submits any documented changes in accordance with the Governments Modern Slavery Act reporting requirements.

Crisp Bros. & Haywards Pty Ltd has policies that set out the commitment to addressing Modern Slavery include Anti Bribery, Code of Conduct, Inclusion and Diversity, Whistleblower Protection and Work Health and Safety.

Crisp Bros. & Haywards Pty Ltd Procurement Team, Managers and Supervisors receive regular training sessions and updates according to the Modern Slavery Act 2018 (no. 153, 2018) to ensure identification of unethical practices or behaviour are not operating within our supply chains and to ensure compliance.

Assessing Effectiveness

We are committed to continuously monitoring our program to identify, assess and manage modern slavery risks and advance the human rights of workers in our company's operations and supply chains.

For organisations like Crisp Bros. & Haywards Pty Ltd that have large and complex supply chains, it is often difficult to measure the ultimate impact of our actions on modern slavery practices. Acknowledging these challenges, enables us to improve the effectiveness of our collaboration with suppliers and external partners to address modern slavery risks for workers in our supply chain.

When assessing the immediate effectiveness of our modern slavery policies, we focus on reviewing the operation of existing processes and systems, ensure that the measures being developed and measured are developed aligned with standard industry practice, identifying gaps or opportunities to mature our approach, and designing and implementing improvements to address identified issues.

By use of our CBH QMS F 0603 Supplier Evaluation Form and CBH QMS F 0604 Supplier Register we can perform risk assessments and monitor our suppliers. Our procurement process ensures that suppliers and subcontractors are obliged to provide products and services under controlled conditions that adhere to our Modern Slavery Policy requirements. This outcome is achieved by:

- Documenting and completing supplier and subcontractor agreements.
- Examination and evaluation of suppliers and subcontractors demonstrated experience and capabilities.
- Selecting appropriate suppliers and subcontractors for work to be completed.
- Conducting post work interviews to verify the quality requirements for Crisp Bros. & Haywards Pty Ltd to engage.
- Evaluation, recommendation and seeking approval from Senior Management for the engagement of preferred suppliers and subcontractors.

Reporting

Crisp Bros. & Haywards Pty Ltd has implemented our CBH WHS P 013 Modern Slavery Policy which is communicated to staff upon commencement of employment through their induction training.

Crisp Bros. & Haywards Pty Ltd Board of Directors has overall responsibility to ensure this policy is implemented and complied with. Our Senior Management team abide by this policy and address any relevant concerns raised by employees.

In the event a supplier or subcontractor where modern slavery is substantiated Crisp Bros. & Haywards Pty Ltd will record formal or anonymous reports of breaches and assess the appropriate course of action with further investigation where necessary.

In line with CBH WHS P 021 Whistleblower Protection Policy anonymous reports can be communicated with the designated team member. Reports will be treated with the utmost confidentiality and the identity of the person reporting will be protected to the fullest extent possible consistent with the need to conduct further investigation.

Person/s reporting will be kept informed of the progress and outcome of the investigation to the extent possible while still maintaining confidentiality and protecting the rights of all parties involved.

Our Modern Slavery Statement and our Modern Slavery Policy is published on our website crispbroschaywards.com.au.

Consultation and Engagement

During the reporting period of this statement, we engaged with Crisp Bros. & Haywards Pty Ltd Board of Directors in the development of this statement. We discussed the Modern Slavery Act 2018 (No. 153, 2018) reporting requirements, and the relevant documentation required for due diligence.

Review

Crisp Bros. & Haywards Pty Ltd reviews this policy and supporting policies annually to ensure best practice and compliance with the Modern Slavery Act 2018 (No. 153, 2018). Updates may be made as necessary to reflect change in laws, regulations or company procedures.

Document Review

Approved	Steven Edmunds
Effect Date	4 th March 2024
Title	Managing Director
Next review	4 th March 2025

This Modern Slavery Statement has been approved by Crisp Bros. & Haywards Pty Ltd Board of Directors on

4th of March 2024

A handwritten signature in blue ink, appearing to read 'Steven Edmunds'.

Steven Edmunds
Managing Director