

# Modern Slavery Statement

2023



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# Statement

Demolition Environmental Civil Contractors Pty Ltd (DECC) and its related entities voluntarily submit our very first Modern Slavery Statement to demonstrate our unwavering commitment to ethical business practices and human rights. DECC recognises the importance of transparency and accountability in addressing the widespread issue of modern slavery.

In an era where global supply chains are increasingly complex and interconnected, the risks of modern slavery cannot be underestimated. DECC acknowledges the responsibility that comes with our position and understands the importance of proactive measures to combat modern slavery within our operations and supply chains.

This statement covers the period from 1 January 2023 to 31 December 2023. It details DECC's process of identifying, assessing, and mitigating the risks associated with modern slavery within both our operations and supply chains. Our ongoing efforts to refine our approach to combating modern slavery are outlined in this statement.

This statement was approved by Frank Lombardi as Demolition Environmental Civil Contractors Pty Ltd sole director on 2 May 2024.



**Frank Lombardi**  
Director



**Prince Alfred Via Duct, Gundagai NSW**

### Common modern slavery practices in property and construction:



Forced or unpaid work



Unsafe conditions



Bonded and child labour



Inadequate accommodation



Passport confiscation



Human Trafficking

### Why is property and construction high risk?



High demand for low-skilled labour force



Poor visibility over long and complex supply chains



Low-tier suppliers operating in high-risk geographies

### Key trends in the sector that intersect with risk:

Australian Infrastructure and Construction expected growth of 10% in 2019. Broad trends for engineering construction are still expected to eventuate in 2020.

↑ 10%

Part-time workers make up 32% of workforce (up from 26% in 2000)

↑ 32%

Commercial Cleaning Services anticipated growth of 2.2% in FY18

↑ 2.2%



## Commonly infringed human rights of workers in the property and construction sector

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Right to enjoy just & favourable conditions of work



Freedom from discrimination & harassment in employment



Freedom of assembly & association and right to strike



Freedom from discrimination on the basis of protected attributes



Right to health (physical & mental)



Right to safety



Right to decent work



Freedom from slavery & slavery-like conditions

Source: KPMG (2020) Property, Construction & Modern Slavery: *Practical responses for managing risks to people.*

# Structure

Demolition Environmental Civil Contractors Pty Ltd (ABN 93 118 380 484) is a privately owned Australian company established in 2007. It is one of four entities that works under the umbrella name DECC.

The three other entities include:

- DECC Pty Ltd (ABN 16 128 598 710)
- DECC Shoring Pty Ltd (ABN 55 155 445 935)
- DECC Environmental Pty Ltd (ABN 76 169 336 725)

Each entity operates independently but collaboratively under the DECC umbrella. DECC's structure, operations, and supply chains remain the same across all entities.



**Frank Lombardi**

Director



**Brenton Watson**

Construction  
Manager



**Jim Pavone**

Operations  
Manager



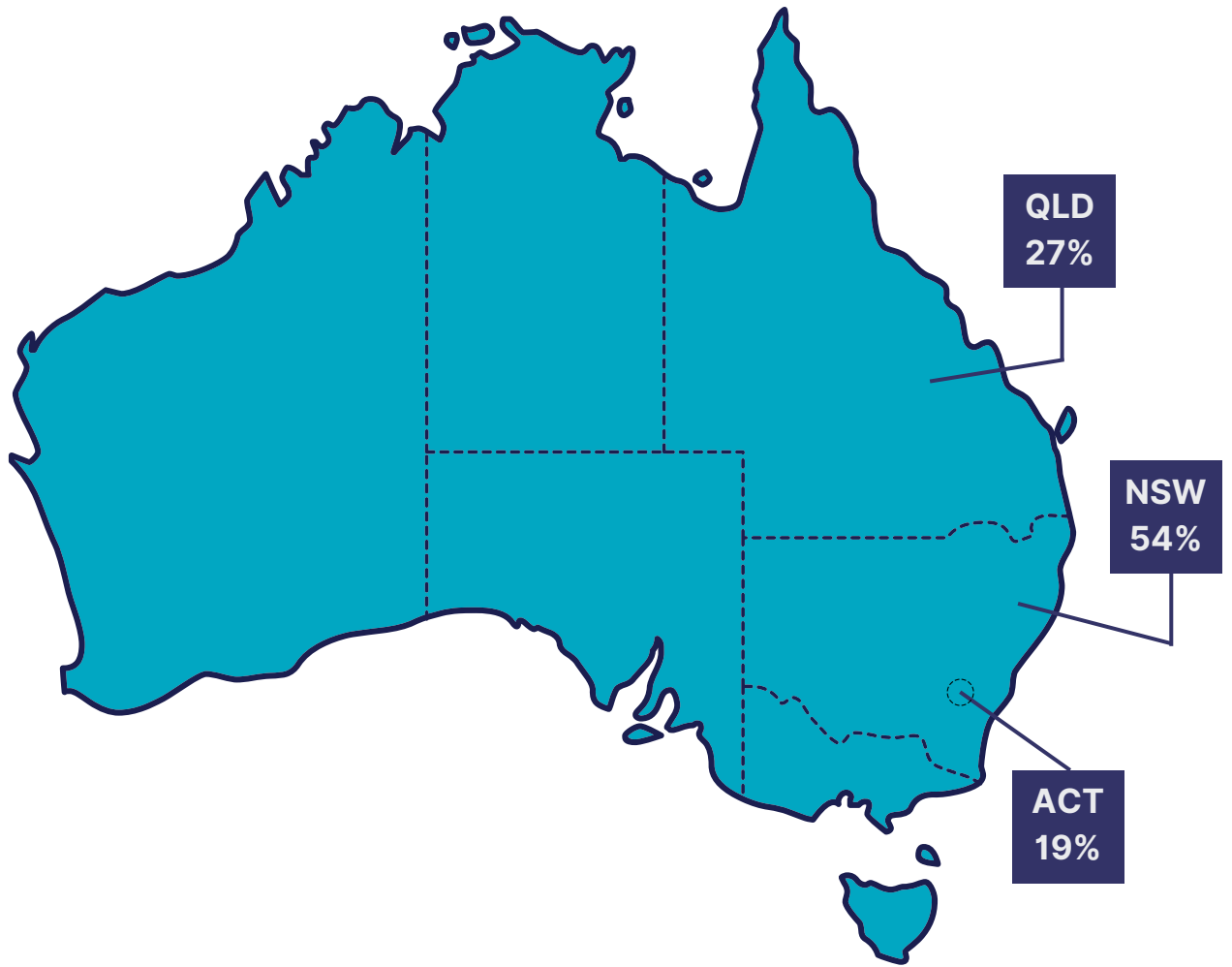
**Blair Fowler**

WHS  
Manager



**Nicky Miller**

Finance



# Locations

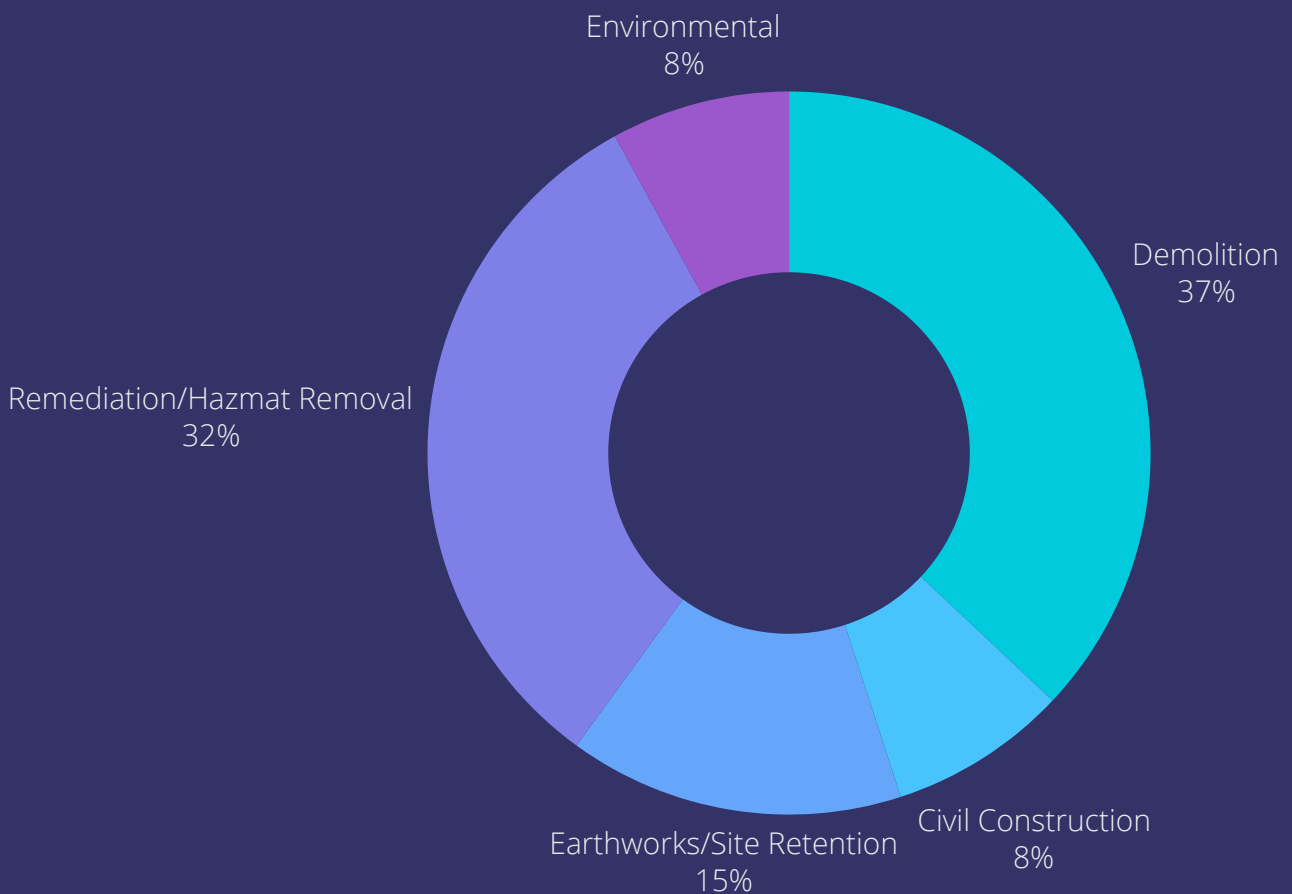


With presence across eastern Australia, DECC have offices in 3 locations:

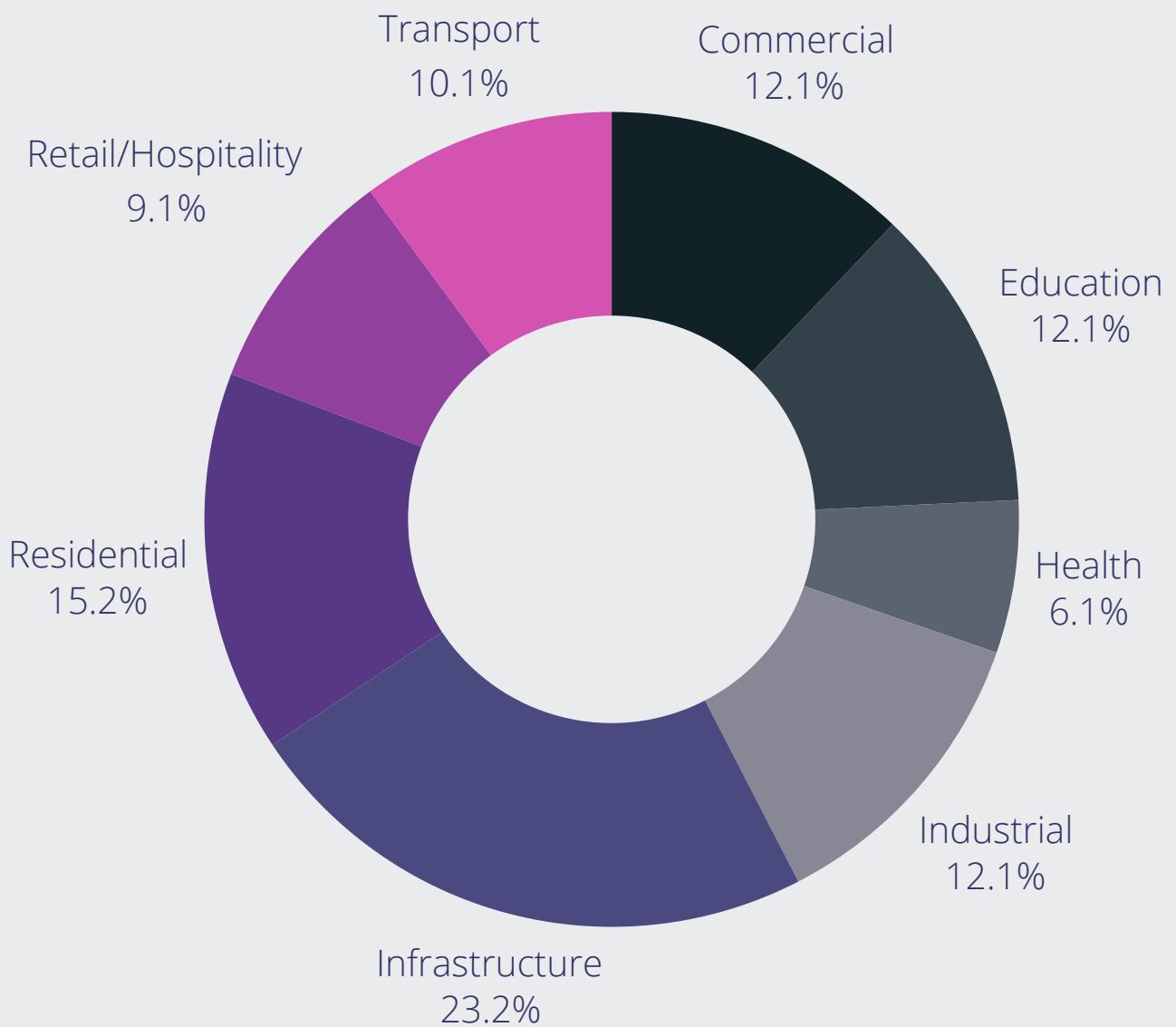
- NSW – 30/19 McCauley Street, Port Botany NSW 2036
- ACT – 9 Wycombe Street, Queanbeyan East NSW 2620
- QLD – 14/15 Corporate Place, Hillcrest QLD 4118

# Operations

DECC specialises in commercial and industrial demolition, environmental services, and civil contracting. With 75 years of collective experience, DECC has established itself as a trusted name in the construction industry in Australia.







DECC has a proven track record of completing diverse projects across transport, commercial, education, health, industrial, infrastructure, residential, and retail/hospitality sectors in various Australian cities.

# Supply Chain

DECC's supply chains are diverse and extensive, encompassing various materials, equipment, and services necessary for its projects. These supply chains include suppliers of construction materials, machinery, safety equipment, subcontractors, and service providers.

All entities under the DECC umbrella share the same services and supply chains.



**University of NSW, Kensington NSW**



## United States

Volvo (Articulated Dump Truck), Bobcat (Skidsteer), Nissan (Forklift)



## United Kingdom

Terex (Articulated Dump Truck), Volvo (Articulated Dump Truck)



## Europe

Hyundai (Excavator)



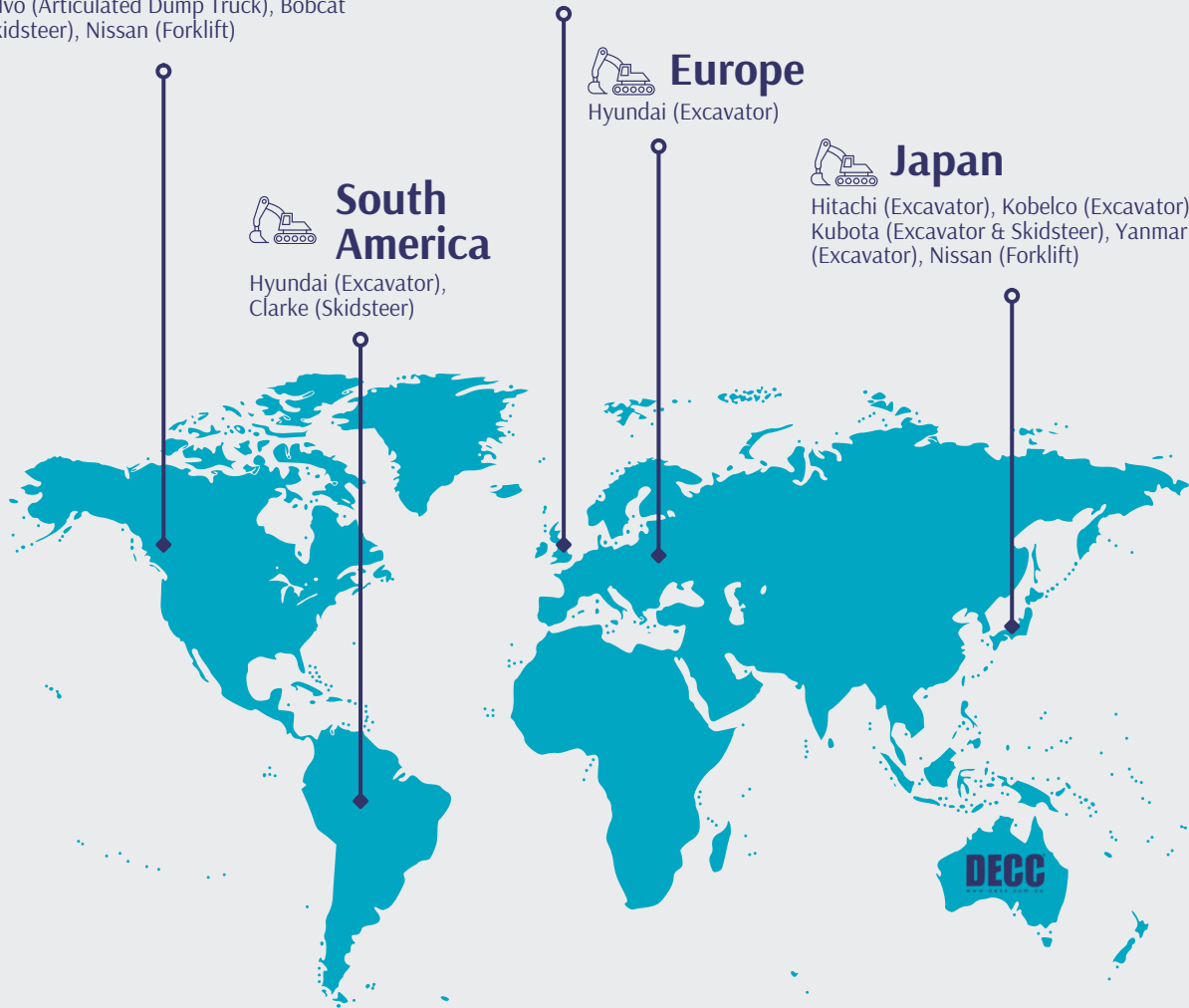
## Japan

Hitachi (Excavator), Kobelco (Excavator), Kubota (Excavator & Skidsteer), Yanmar (Excavator), Nissan (Forklift)



## South America

Hyundai (Excavator), Clarke (Skidsteer)



# Risk Within DECC

Demolition Environmental Civil Contractors Pty Ltd does not own or control any other entities however, work in collaboration with DECC Pty Ltd, DECC Shoring Pty Ltd, and DECC Environmental Pty Ltd.

As part of the development of this statement, Demolition Environmental Civil Contractors Pty Ltd.'s Senior Management actively engaged and consulted with these entities during quarterly Senior Management meetings.

These consultations were aimed at detailing our expectations, raising awareness, and gaining a deeper understanding of their approaches to mitigating modern slavery risks. Additionally, we ensured that these entities had the opportunity to provide input into the statement, allowing for a comprehensive and collaborative approach to addressing modern slavery across our operations and supply chains.





In the construction industry in Australia, several factors contribute to the risks of modern slavery.

These include:

- **Subcontracting Chains:** Construction projects often involve layers of subcontracting which can obscure visibility into labour practices down the supply chain, increasing the risk of exploitation.
- **Vulnerable Workforce:** The construction industry often relies on migrant workers, temporary workers, and low-skilled workers who may be susceptible to exploitation due to language barriers and limited knowledge of their rights.
- **Irregular Employment practices:** Informal hiring practices, like cash payments, may be used to circumvent labour regulations.
- **Labour Trafficking:** This may occur when workers are deceived, coerced, or forced into working under exploitative conditions, often involving debt bondage, confiscation of passports or a restriction in movement.

DECC's potential involvement or direct linkage with the most vulnerable forms of modern slavery includes forced labour, child labour, servitude, and human trafficking.

The likelihood of DECC, along with its related entities, being directly involved in any form of modern slavery is extremely low.





Source: KPMG (2020) Property, Construction & Modern Slavery: *Practical responses for managing risks to people.*



# Risk Management

DECC are working towards implementing more effective actions to assess and address the risks associated with modern slavery within the construction industry and our supply chain, in line with the UN's Guiding Principles on Business and Human Rights.

Currently, DECC take the following actions:

- Implementation of a policy commitment to meet our corporate responsibility to respect human rights. This policy is endorsed by the Director and communicated across all entities.
- Conducting risk assessments of subcontractors to ensure visibility into labour practices.
- Recognising the vulnerability of the workforce including migrant, temporary, and low skilled workers.
- Ensuring the workforce, where applicable, is covered by an Enterprise Bargaining Agreement (EBA) registered and recognised by the Australian Building & Construction Commission and Fair Work Commission.
- Hiring processes comply with relevant employment laws and regulations.
- Adhering to the Security of Payment policies in line with the Building Code 2016, maintaining a transparent payment processes to prevent financial exploitation.

Our policy encourages staff and workers to raise concerns with their Supervisor regarding any likely breaches in any parts of DECC's supply chain or business. DECC are working on a process to better respond to these concerns in a manner that does not jeopardise the safety of victims.

Along with working on a better response process, DECC aim to implement the following over the next 12 months:

- A more effective and confidential grievance mechanism to help identify and address staff and worker concerns.
- A more detailed prequalification process for all subcontractors to help identify modern slavery risks and to ensure legal compliance.







# Effectiveness

The DECC Director reviews and approves company policies yearly to ensure their accuracy and effectiveness. Moving forward, the actions outlined in this statement will be become part of this review.

Internal audits, covering subcontractors, are conducted by the WHS Department, and are completed monthly. Corrective actions identified during these audits are documented and actioned by the DECC Site Management Team and/or WHS Department.

As part of DECC's plan to continuously improve staff and worker education, we are committed to developing and implementing a more comprehensive training program addressing modern slavery risks.