

Respecting Human Rights



Our Modern Slavery Statement

## About this Statement

Fitzgerald Constructions Australia (Fitzgerald) has prepared this Modern Slavery Statement (Statement) to address the requirements of the Australian Modern Slavery Act 2018 (Cth) (Act). The reporting period covered by this Statement is 1 January 2023 to 31 December 2023.

The Board of Fitzgerald approved this Statement on 8 January 2024.

## General Manager message

Our Company pillars are to Purposeful, Trustworthy, Passionate, Innovative Accountable, Committed and be a team of built on Integrity.

We deeply think about what we do and how it affects lives within and outside our firm. This provides us the guiding light, on how we deliver our Projects with our Clients. In line with our values, we are committed to eradicating any form of human rights abuse from our supply chain, including modern slavery.

Within our first Modern Slavery Statement, we explain how we assess risks in our supply chain, set clear standards, and continuously improve our oversight and management of any identified risks. We undertake a diverse range of projects, including construction, design and maintenance. As a result, our supply chain includes providers as broad as concrete, steel and reinforcement suppliers, professional consulting services, fabricated steel suppliers.

It is not only vital for companies like ours to lead, it is necessary to take action to protect human rights at every level of our supply chain.



**Romeo D'Amato**  
General Manager

## Our Business

Since our incorporation in 1999, we have been committed to supporting communities around Australia by building infrastructure that improves lives and makes us more connected.

We are one of the nation's leading marine, civil infrastructure, bridge, water and sewerage treatment infrastructure firms where we find solutions to complex challenges and opportunities. We operate generally within the states of Victoria, Queensland and South Australia, delivering significant projects in a team spirited manner where we always aim to have a positive impact on communities, stakeholders, while continuing to push boundaries of innovation.

The legacy of delivering these creations Safely, with Quality to be proud of and in an Environmentally responsible manner is just as important as the physical infrastructure we build. We take the responsibility to conduct our business sustainably seriously, including by taking steps to assess and address modern slavery risks in our operations and supply chain.

## Our Vision

Our vision is:-

- To be the leading specialised marine, remedial, engineering and construction company where we are chosen by our clients for our integrity, innovation, team spirit and delivery performance;
- To undertake all our projects with pride, quality, safely, within budget and on time;
- To continue growth by expanding into adjacent and complementary markets and;
- To continue to foster and develop strategic alliances and partnerships.

## Our values

Our values are:-

- **Well-being** putting health and safety first.
- **Respect**, embracing openness, trust, collaboration for mutually beneficial relationships.
- **Innovation**, refusing to accept “business as usual” by exploring, stretching our capabilities.
- **Integrity**, doing what we say we will do.
- **Accountability**, defining our commitment and accepting responsibility and delivering on our commitments.
- **Team spirited**, ensuring our team start the day with a sense of purpose and finish with a sense of accomplishment.
- **Simplicity** focusing our efforts passionately on the things that matter most.
- **Performance**, being environmentally responsible, achieving superior quality and business results.

## Our Supply Chain

We are based in Australia, where the great majority of our suppliers are Australian suppliers. Our procurement systems and policies are managed by our respective Project teams, in consultation with our office procurement team from Australian suppliers and oversees international procurements when they occur such as purchasing of steel piles for our piling projects.

The key categories of goods and services we procure include:-

- Concrete and reinforcing product supply: including crushed rock, ready-mix, precast concrete, reinforcing bar and mesh;
- Professional consulting services: including engineering design services, as well as environmental, inspection and construction services;
- Labour hire: short term project labour for our sites;
- Plant and equipment: including dry hire (hire of equipment) and wet hire (hire of equipment and services to operate it), as well as purchase of a wide range of owned equipment, from cranes, barges and elevated work platforms;
- Sub-contracts: including contracts to installation of concrete pile, reinforcement and concrete placement;
- Fabricated steelwork: including heavy, medium and light steel products from bridge girders through to handrails;
- Industrial consumables: including gasses, welding consumables, fasteners, small tools, and PPE;
- Fuels and lubricants: including fuel and lubricants for plants and equipment and hydraulic oils.

We have a strong focus on creating opportunities through social inclusion with our social procurement partners Yurringa Pty Ltd. Together we are improving our social procurement and inclusion practices, including by working with our subcontractors and suppliers to provide employment opportunities to people from diverse backgrounds, directly or indirectly through social and Indigenous enterprises.

We empower our project teams to use local and Indigenous suppliers, wherever possible in order to reduce our exposure to modern slavery risks associated with larger international suppliers because we are more easily able to monitor working conditions and undertake due diligence easier in comparison to overseas locations with the current COVID-19 travel restrictions.

## Identifying our modern slavery risks

We understand modern slavery risks can occur in Australia, as well as overseas. We also recognise that modern slavery risks in businesses' global operations and supply chains can change over time. During the reporting period, we worked to refine our understanding of modern slavery risk areas across our operations where a modern slavery risk workshop was undertaken to consider the following:-

- Procurement
- People
- Health, Safety & Environment

Through this, we have identified a range of potential modern slavery risk areas that may be present in the operations and supply chains of entities in the infrastructure sector. These potential risk areas include:

- The risk that service providers responsible for cleaning and site security services may exploit workers through modern slavery, including through unauthorised subcontracting.
- The risk that labour hire firms providing contracted labour may exploit workers through modern slavery, including where these workers are lower skilled or from migrant backgrounds.
- The risk that products such as PPE may be manufactured using modern slavery or materials produced with modern slavery and other forms of labour exploitation, and
- We recognise that the construction sector can include risks linked to the production of materials in countries where there are reports of forced labour.

## Procurement Processes

Whilst we undertake the great majority of their works with our directly employed employees and owned plant, for those occasions when we seek assistance, that have an established procurement procedure for external services, materials and plant. All subcontractors and suppliers are subject to the staged pre-qualification, evaluation and assessment prior to any approval, engagement and contract execution.

The following particular components of our procurement process demonstrate steps currently taken by us to address and eliminate modern slavery in its business and supply chain:

1. Identification of any hazards which may be introduced with the purchase of goods and services and labour hire arrangements and conducting a risk assessment to identify controls to be implemented to eliminate or reduce the risk to as low as reasonably practicable.
2. Our subcontracts for Supplies and Services requires them to warrant that they have not engaged in any collusive or anti-competitive behaviour in connection with the tender or the agreement for the supply. Additionally, it contains a modern slavery clause whereby the supplier warrants to comply with applicable modern slavery laws, take all reasonable and necessary steps to identify, investigate and eliminate modern slavery in its operations and supply chains, and provide all information reasonably necessary as requested by us to enable them to comply with its obligations under Modern Slavery Laws.
3. Following engagement of suppliers and subcontractors, we allocate a project representative to mobilise and closely monitor, track and administer the Contract.

4. Our subcontractors and supplier management procedure sets out the process for the management of subcontractors and suppliers to ensure that outsourced processes are adequately controlled and externally provided processes, products and services conform to requirements including legal, client and our requirements.
5. The vendor pre-contact assessment for evaluation of pre-qualified subcontractors and suppliers is a checklist required to be completed by the subcontractors and suppliers and includes information on sustainability and initiatives on social and ethical responsibilities and diversity programs.

Finally, we will only work with subcontractors and suppliers who commit to operating to the same standards as them. To reinforce this, we have introduced mandatory modern slavery clauses into all supply chain contracts.

## Assessing the effectiveness and future plans

Our actions of an extensive procurement process and contractual terms requiring subcontractors and suppliers to comply with legislative obligations including those relevant to eliminating modern slavery and Georgiou's practices, policies and procedures appears to have been effective in minimising any risk of modern slavery within at least their first tier supply chain (a supplier or subcontractor which we have a direct contractual relationship with).

## Moving Forward

We have implemented processes and practices within our business including its extensive staged procurement process and contractual terms to minimise any potential risk of modern slavery within their own and their first-tier suppliers and subcontractors.

Future plans to enhance the measures we have already undertaken, as set out above in this statement, supports commitment to effectively identify and address any potential risk exposure of modern slavery in the business and supply chain as part of the ongoing modern slavery roadmap.

This statement was approved by Fitzgerald Constructions Australia Pty Ltd Board of Directors on 8 January 2024.



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