

## MODERN SLAVERY STATEMENT 2023

This statement covers the activities of Sydney Civil Pty Ltd (ABN 90 078 474 665) to identify, respond to and mitigate the risk of modern slavery and human trafficking in its operations and supply chain. This statement will reside on our Company's website at <https://sydneycivil.com/>.

Sydney Civil Pty Ltd is a privately-owned company and has no other reporting entities or subsidiaries.

The actions described in this statement cover the period 1 July 2022 to 30 June 2023. The statement is signed by our Chief Executive Officer, Adrian Mourad, as the Sole Director of the reporting entity.

### Our commitment

Sydney Civil will not tolerate, nor be party to, enabling or encouraging (even inadvertently) any types of modern slavery practices within our business, our business partners, or amongst our contractors and suppliers. We do not see modern slavery as a compliance issue but rather as an issue that conflicts with our company's values and ethics.

Modern slavery represents a serious risk to our clients, our suppliers and our company. Most of all it is a serious risk and a reality for the millions of people who are targeted and exploited as modern slaves around the world. The construction sector is especially at risk from modern slavery practices – a sector that Sydney Civil both serves and sources from.

This is our first Modern Slavery Statement ("statement"). While this statement is in response to the Federal Modern Slavery Act 2018, it is driven by, and reflective of, our commitment to act on any incidences of modern slavery in our supply chain. The statement aligns with and complements our aim of improving Sydney Civil's sustainability practices. It is part of our overall sustainability approach that links our sustainability commitments to our business strategy.

### Who we are

Sydney Civil Pty Ltd is a private company which commenced in 1997 and employs 98 full time equivalent employees. Sydney Civil is Australian-based and involved in civil construction projects in Greater Sydney. Our typical projects include streetscapes, cycleways, intersection upgrades and landscape design and construction projects.

Sydney Civil has one office (its Head office) at Turrella NSW, as well as a depot in Rockdale NSW, and primarily delivers work in the Sydney metropolitan area.

In FY23, Sydney Civil's revenue was mainly derived from construction projects commissioned by the City of Sydney Council.

### Our approach and progress

#### Our policies and governance

Sydney Civil is committed to acting ethically and responsibly at all times in our business ventures and relationships. If a modern slavery occurrence is found anywhere in our business or supply chain we will respond immediately to address it.

We are committed to transparently reporting our actions and in eliminating modern slavery consistent with the *Australian Modern Slavery Act 2018*.

## Our Modern Slavery Policy

Our Modern Slavery Policy drives our anti-slavery commitments and actions. It underpins our efforts to prevent, detect and respond to the risk of modern slavery occurring within Sydney Civil, our supply chain and our business ventures. Everyone at Sydney Civil has an obligation to follow this policy and apply it to their role. The prevention, detection and reporting of modern slavery in any part of our business or supply chain is everyone's responsibility.

Our objectives and targets in relation to modern slavery are as follows:

- To ensure that Sydney Civil is not enabling or encouraging (even inadvertently) any modern slavery practices within our business, with our business partners, or amongst our suppliers.
- To identify and understand our modern slavery risks and that of our suppliers.
- To identify opportunities to reduce or eliminate modern slavery for our business and suppliers.
- To have a coordinated and consistent approach to managing and responding to our identified modern slavery risks and opportunities.
- To inform our suppliers, clients and business partners of our modern slavery policy, any expectations we have regarding their support, or opportunities to partner with them, in addressing this risk.
- To regularly and transparently report to governments, clients, employees, business partners and the community our progress and actions to reduce or eliminate the risk of modern slavery in our business and value chain.

## Roles and responsibilities

Everyone at Sydney Civil has a responsibility to identify and manage modern slavery risks, including:

- **Our managers:** remaining informed and up to date on the relevant risks to our business and suppliers, as well as educating and supporting their teams around managing risks and being responsive should any risks be identified by their team.
- **Our employees and consultants:** being aware of the risks and alert to any potential situations where these risks could arise, especially on our projects and in relation to our suppliers and contractors. For any new employees, we will ensure that their induction includes a component that addresses modern slavery.
- **Our business partners:** ensuring that they are aware of our commitments and objectives in relation to modern slavery. The prevention, detection and reporting of modern slavery in any part of our business or supply chain is everyone's responsibility.
- **Our suppliers:** ensuring that we engage suppliers around modern slavery risks, clearly communicate our expectations for management of those risks, and assess how well those risks are being managed. These supplier engagement activities will be led by our contracts and procurement personnel.
- **Our current and future clients:** demonstrating how we are managing our risks around modern slavery, the systems and processes we use to support this and, where required, provide them with a copy of our Modern Slavery Policy, Management Plan and Annual Statement.

## Training and education

A key part of managing our modern slavery risks is through education and awareness. Education around modern slavery commences when a new employee arrives at Sydney Civil, as part of their induction process. Refresher training on modern slavery risks will be conducted once a year for all staff.

## Our Risk Management Plan

In June 2023, we commenced planning our approach to manage our modern slavery risks to ensure that they are not occurring within our own business operations or in our supply chain. We have assessed and identified our

modern slavery risks in our value chain, so we can respond to and manage any identified risks, educate our employees and our suppliers about modern slavery, and transparently report our efforts to stakeholders.

Sydney Civil's Modern Slavery Risk Management Plan implements our anti-slavery policy across our business and through our supply chain. It describes and coordinates our efforts to prevent, detect and respond to the risk of modern slavery occurring within Sydney Civil, our supply chain and our business ventures. The key components of our modern slavery risk management system are:

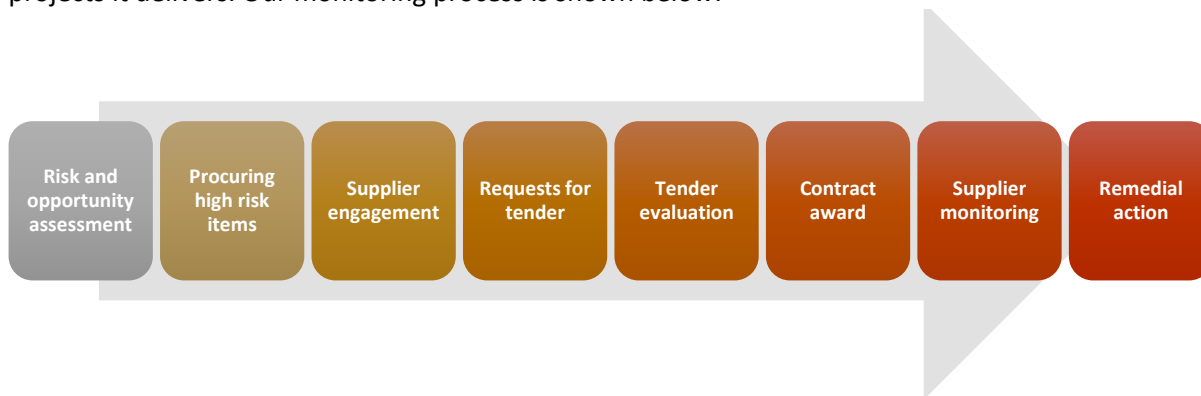
- Our Modern Slavery Policy
- Our Modern Slavery Risk and Opportunity Assessment
- Our Modern Slavery Risk Management Plan
- Modern slavery awareness is included in the induction process for our new employees
- Our supplier documentation (including a modern slavery questionnaire)
- Our Annual Modern Slavery Statement

The above policies and procedures are backed up by a genuine commitment to address modern slavery, which is driven from the top with strong backing from our management.

Our Contracts Managers oversee the implementation of our Modern Slavery Risk Management Plan, which is reviewed annually and updated where required.

## Our planned due diligence activities for FY24

To support Sydney Civil's zero-tolerance policy for any type of slavery-related practices, from FY24 we will implement a range of monitoring activities to manage the risks associated with our suppliers, materials and operations. The monitoring of modern slavery risks will be an ongoing process for the business and for the projects it delivers. Our monitoring process is shown below:



## Identifying and understanding our risks

Sydney Civil sources the majority of its construction materials and services from within Australia, with a small amount sourced offshore, notably China. Sydney Civil is aware that offshore procurement potentiates the risk of modern slavery, and that certain sectors in Australia such as labour hire, cleaning and security services also present a risk. As noted above, Sydney Civil Pty Ltd is a privately-owned company and has no other reporting entities or subsidiaries.

With this in mind, in 2023, Sydney Civil conducted an independent risk assessment to identify any materials, goods, services or equipment whose procurement could increase the likelihood of modern slavery in its supply chain. The higher risk items identified as potential modern slavery risks by Sydney Civil are listed below:

- Steel (structural, bars and mesh) suppliers
- Concrete (ready mix and precast) suppliers

- Cement suppliers
- Timber suppliers
- Pipes (concrete) suppliers
- Tiles (ceramic) suppliers
- Pavers (stone) suppliers
- Bricks (common) suppliers
- Electrical systems installation (including A/C, Fire, Lighting, Appliances, Switchboards)
- Fire protection systems installation (including pumps and other equipment)
- Hydraulic systems installation (including gas, water, pumps, sewerage)
- PPE (incl gloves and boots) suppliers
- Corporate clothing suppliers
- Security services
- Cleaning services
- Installation and maintenance services
- Labour hire (contractors and subcontractors) services
- Landscaping services

The above materials and services procured by Sydney Civil are treated as per the following steps:

### Procuring high risk items

A list of high risk items identified from the risk assessment is maintained by Sydney Civil's contracts manager and circulated across the business. The list is reviewed every six months and updated if needed.

### Supplier engagement

Potential and existing suppliers of these high risk items are engaged around Sydney Civil's modern slavery policy requirements for the supply of those items and the associated risks. This engagement includes the communication of Sydney Civil's expectations of suppliers around managing those risks.

### Requests for tender

For high risk items and services, our request for tender details Sydney Civil's requirements for the supply of those items and expectations of the tenderer in relation to managing modern slavery risks.

Sydney Civil's Modern Slavery Policy and modern slavery questionnaire are issued to the tenderer asking for the details of their management of the associated modern slavery risks of that item. The tenderer must return the completed questionnaire to Sydney Civil as part of their tender submission.

### Tender evaluation

Sydney Civil's contracts manager reviews the tenderer's responses to the questionnaire and decide if their risk management approach is adequate. Should the responses not appear to be satisfactory, the contracts manager will ask for further information from the tenderer.

### Contract award

The contract for high risk items includes clauses detailing Sydney Civil's requirements for the supply of those items and expectations of the tenderer in relation to managing modern slavery risks; including requiring the supplier to implement risk management measures within three months of the contract being awarded if their initial responses to the questionnaire are deemed insufficient; and noting Sydney Civil's right to terminate the

contract should concerns arise in relation to identified incidents or unacceptable modern slavery risks not being promptly addressed.

### Supplier monitoring

For longer term contracts, Sydney Civil engages with the supplier every six months to confirm that their supply chain has not changed in terms of the sourcing of the item or other factors that may affect the risk of modern slavery associated with that item.

### Remedial action

Should any concerns arise during the contract period, Sydney Civil contacts the supplier to discuss the concern and specify actions required by the supplier in relation to meeting the contract conditions. Sydney Civil will terminate a contract should concerns arise in relation to identified incidents or unacceptable modern slavery risks not being promptly remediated by the supplier.

### Measuring our effectiveness

To monitor the effectiveness of the tools and processes that we use in relation to modern slavery risks within our operations and supply chain, we evaluate our progress and success against the following KPIs:

- number of modern slavery training and awareness-raising programs delivered
- number of potential modern slavery incidents or risks identified during the year
- number of supplier contracts issued that include modern slavery clauses
- number of supplier engagements to help them respond to modern slavery risks.

Sydney Civil will report on these KPIs in our next Modern Slavery Statement in 2024.

### Communicating, engaging and collaborating with our stakeholders on modern slavery

Sydney Civil will continue to publish further Annual Modern Slavery Statements in accordance with the *Australian Modern Slavery Act 2018*. Copies of these statements will be made available on the Sydney Civil website and will be sent to our current clients, business partners, suppliers and employees.

Our suppliers will continue to be engaged around Sydney Civil's requirements for the supply of any materials, goods and services that have a higher risk of modern slavery as determined by our risk assessment process. This engagement includes the communication of Sydney Civil's supplier expectations in relation to managing modern slavery risks.



Adrian Mourad  
CEO

23/09/2023

**Dated**