

MODERN SLAVERY STATEMENT FY 2022





SECTION1 - INTRODUCTION

Vaughan Constructions Pty Ltd (Vaughan) is a privately owned Australian Design and Construction business specialising in industrial construction. Vaughan cares for the staff, the people we work with, the community and the environment.

Vaughan believes in the protection of human rights and has a target to minimise the potential for modern slavery and are fully committed to preventing forced labour, freedom from torture and other cruel, inhuman or degrading treatment or punishment.

This Statement has been published in accordance with the Modern Slavery Act 2018 for Vaughan Constructions Pty Ltd ABN 26 004 334 543 and Vaughan Constructions QLD 81 644 381 055. It identifies the steps Vaughan has taken to identify the risks of modern slavery within our supply chain and the actions taken to reduce those risks during financial year 2022.

SECTION 2 — STRUCTURE & OPERATIONS

Vaughan Constructions Pty Ltd is a private company that operates nationwide within Australia. Vaughan has three offices:

VIC Head Office

880 Lorimer Street, Port Melbourne, VIC 3207

NSW Office

9A Commercial Street, Kingsgrove, NSW, 2208

QLD Office

31 Murray Street Bowen Hills, QLD, 4006

Vaughan consists of a Board of Directors - three non-executive Directors; Matthew Vaughan, Ken Vaughan and Chairman Richard Garvey, as well as three executive Directors; Managing Director Andrew Noble, Eric (Hock Ching) Law and Mark Byrne.

Vaughan has established itself for 6 decades as a respected industrial and commercial builder Australia wide. Our process is to Plan, Design and Construct as well as provide the following services,

- Feasibility Analysis,
- Site Acquisition,
- Pre - Leasing,
- Land & Building Packages,
- Extensions & Refurbishments,
- Development Management.

With a team of 180 dedicated staff, we are dedicated to carry out business ethically with integrity and transparency. We expect the same high standards from our suppliers and subcontractors.

SECTION 3 — SUPPLY CHAIN

At Vaughan, we aim to establish a relationship of trust and integrity with all our suppliers and subcontractors, which is built upon mutually beneficial factors.

Our supplier selection process includes:

- Compliance with government mandated standards,
- Compliance with health and safety requirements.

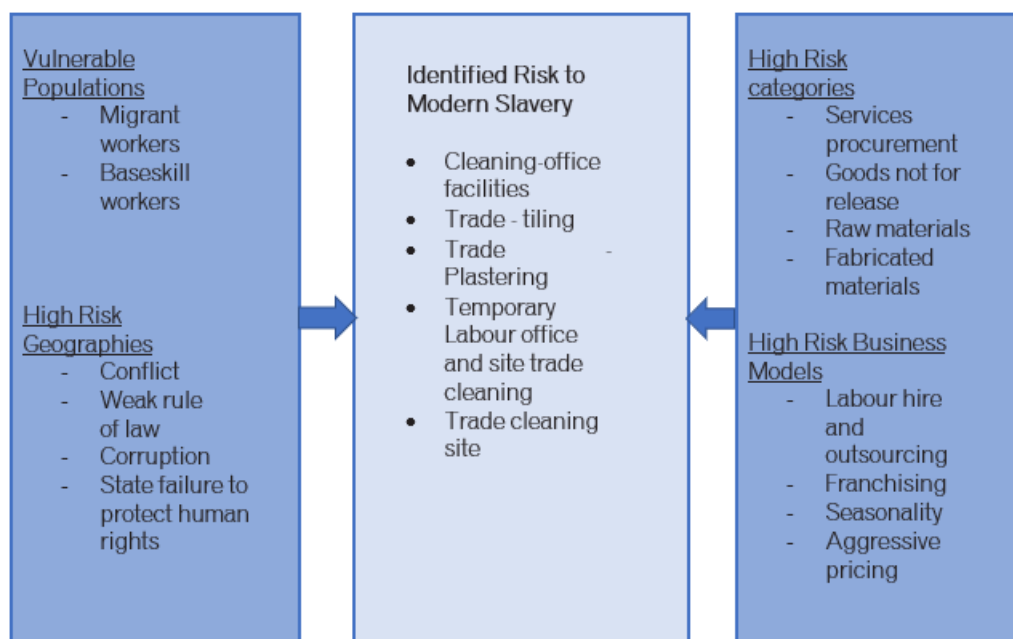
Our subcontractor selection process includes:

- Compliance with government mandated standards,
- Compliance with health and safety requirements,
- Compliance with environmental requirements,
- Minimum of three industry references.



SECTION 4 – IDENTIFYING OUR MODERN SLAVERY RISKS

Vaughan have identified those suppliers and subcontractors at the highest risk of modern slavery through a risk assessment.



Using the risk assessment Vaughan, identified 5 classes of suppliers that were of medium risk:

- Cleaning contractors,
- Tiling Trades,
- Plastering Trades,
- Temporary labour,
- On site cleaning trades.

Vaughan have commenced working with the suppliers above to learn more about the issue and to put in place actions to help them address or mitigate the modern slavery risk.

Where respondents have indicated no awareness or no plan to assess modern day slavery, we have provided training and provide support as part of our program of continuous improvement to ensure the risk of modern slavery in the supply chains of our high value medium risk direct suppliers are assessed and where issues are identified are addressed.



SECTION 5 – OUR ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

	FY2021	FY2022	FY2023
Documentation	Publish a Whistleblower Policy ✓		Publish a Modern Day Slavery Policy
		Ensure all new contracts have a modern slavery clause ✓	Ensure all new contracts have a modern slavery clause
	Introduction of a code of conduct & supplier code of conduct policy 2020 ✓		
	Addition of modern day slavery questionnaire in all pre subcontractor prequalification ✓		Develop a more detailed questionnaire for issue to direct suppliers to identify risk of modern slavery in operations
	Addition of modern day slavery questions for all site induction workers ✓		
Due Diligence	Apply risk matrix to all direct suppliers to identify those with a high risk of modern slavery ✓	Apply risk matrix to all direct suppliers to identify those with a high risk of modern slavery ✓	Apply risk matrix to all direct suppliers to identify those with a high risk of modern slavery ✓
			Issue modern slavery questionnaire to high risk direct suppliers
	Assess responses to modern slavery questions in prequalification and identify any issues ✓	Assess responses to modern slavery questions in prequalification and identify any issues ✓	Assess responses to modern slavery questions in prequalification and identify any issues ✓
Training	Train employees on Whistleblower Policy ✓	Train employees on Whistleblower Policy ✓	Compulsory modern slavery training to be implemented for all employees
			Train employees on Modern Day Slavery Policy
	Train employees on how to identify, assess and respond to modern slavery risks ✓	Train employees on how to identify, assess and respond to modern slavery risks ✓	Train employees on how to identify, assess and respond to modern slavery risks ✓
		Train employees on Modern Slavery Identification & Remediation process ✓	Train employees on Modern Slavery Identification & Remediation process ✓



SECTION 6 – ASSESSING OUR EFFECTIVENESS AND FUTURE PLANS

Over the next 12 months, we will build upon the progress we have made and continue to engage and educate our suppliers in relation to Modern Slavery. Our 2021 reporting period aim was to gain a better understanding of our modern slavery risks and how such risks may be present in our operations and supply chains. At that early stage we were unable to adequately assess the effectiveness of all the measures that were put in place but more so identify and work with the suppliers.

We have now commenced and will continue to work on developing frameworks and processes to ensure we can review the effectiveness of the actions now in place.

The present actions taken to assess effectiveness are as follows:

- Conducting audits on staff and suppliers on awareness of Modern Slavery. Reporting on this has shown there has been a vast improvement after training has been provided. Completion rates on training are of a higher amount than in the first reporting period.
- The fewer amount of Modern Slavery Identification and Remediation forms submitted in this second reporting period in comparison to the first period.
- More precedent pre questionnaire contracts have modern slavery clause included.
- Site Induction Worker Record clause on Modern Slavery is at a higher percentage compliancy in comparison to first reporting period.
- Regular meetings with suppliers has shown more actions have been put in place to address modern slavery risks.

Our next actions to be assessed and reported on are as below:

- Providing percentages of our suppliers who have reduced from low risk to zero risk.
- Developing a targeted ethics survey for suppliers and subcontractors to further review of compliance with the Modern Slavery Act.
- Conducting an annual review of the processes we have put in place to assess and address modern slavery and look at its way to improve this.
- Working with suppliers & Sub Contractors displaying Modern Day Slavery Risks from questions answered on Subcontractor prequalification forms.
- Ensure all Employees have read the Modern Slavery Policy and conducted the online training on how to identify, assess and respond to Modern day Slavery.



SECTION 7 – REPORTING

During the reporting period this statement covers, we actively engaged and consulted with Vaughan Constructions Queensland. We discussed details of the Modern Slavery Act 2018's reporting requirements, information regarding the actions we intend to take to address these requirements and provided them with relevant materials and training.

Vaughan Constructions Pty Ltd submits this report to the Home Office in conjunction with its subsidiary Vaughan Constructions (QLD) Pty Ltd.

APPROVAL

This statement covers 31st July 2021 to 31st June 2022 and has been approved by Vaughan Constructions Board of Directors at the Board meeting held on 27th Feb 2023.



Andrew Noble
Managing Director
27th Feb 2023

