



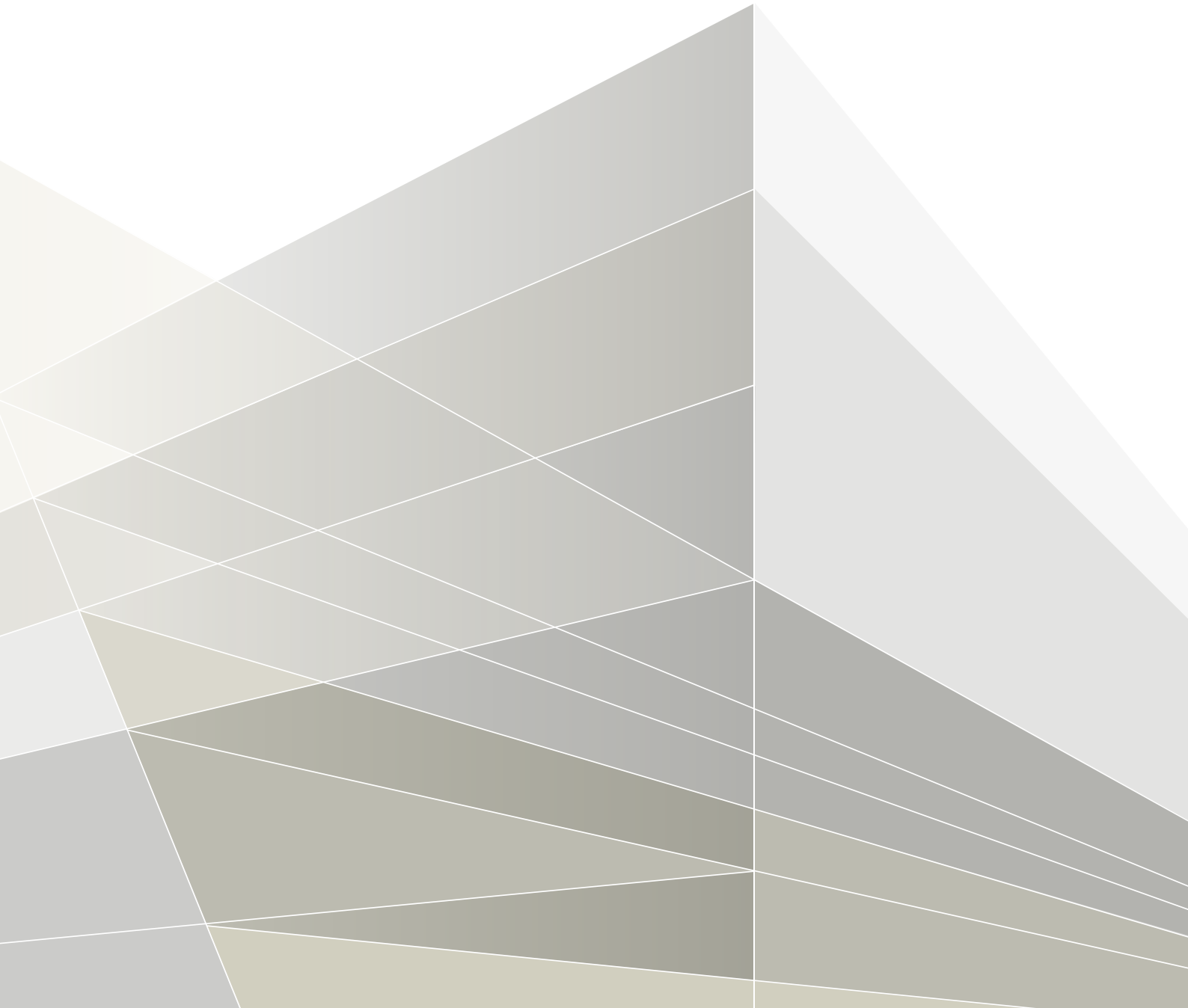
# MODERN SLAVERY POLICY

## Policy Document

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Authorised by: Gary Hartley



## **CONTENTS**

(1) INTRODUCTION

(2) OUR POLICY

(3) PROCEDURE TO FOLLOW

## **1. Introduction**

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. This policy explains Neo Construct's approach to modern slavery and sets out what you should do if you believe that any form of modern slavery is taking place within our business or supply chain. This policy applies to all individuals working on Neo Construct site in any form, including agency workers, volunteers or contractors.

Neo Construct acknowledges that the construction industry is one of the sectors where modern day slavery can be an issue. Low-skilled, manual, low-waged work has been identified as an area where workers are more likely to be subjected to forced labour and casualisation of the workforce through temporary agency work is common. We endeavour to check on all our subcontractors to ensure that minorities are not being unfairly disadvantaged.

The construction industry supply chains are also very long and complex, stretching across many countries. Where we are the final specifiers, we are very careful that we understand where the products are made and by whom, Neo Construct do not direct import any materials therefore do not pose any risk, most of our purchases are from Australian companies [eg. Bunnings, Bowens, CSR, Capral], these companies only supply products that are in line with the Modern-Day Slavery act.

## **2. Our Policy**

Neo Construct has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain. We accept that we have a responsibility to ensure, through our due diligence processes and so far, as is possible, that workers are not being exploited, that they are safe and that relevant employment, health and safety, and human rights laws and standards are being adhered to, including freedom of movement and communication. If we believe that these rules are not being adhered to, we will notify the relevant authorities.

The prevention, detection, and reporting of modern slavery in any part of business or supply chain, whether in the Australia or abroad, is the responsibility of everyone working for Neo Construct. You must avoid any activity that may lead to a breach of this policy and should report any concerns immediately under the reporting procedure below.

## **3. Procedure to Follow**

If you believe or suspect that a breach of this policy has occurred, is occurring, or may be about to occur, you must report it by speaking to your manager. You should raise any concerns that you have as soon as possible, provided that it is safe to do so. If you are unsure about whether a particular act, the treatment of workers, or their working conditions constitutes modern slavery, please raise it with the Director.

Neo Construct encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. You will not suffer any detrimental treatment as a result of reporting in good faith a suspicion that modern slavery is taking place in any part of the business or our supply chain.

AUTHORISED BY:

**Gary Hartley**  
Director



EFFECTIVE DATE: 30/10/2021