

**Our Solutions.  
Your Success.**



# **MODERN SLAVERY STATEMENT**

*Financial Year 2020*

## ***Our Commitment***

The Modern Slavery Statement by Lucas Total Contract Solutions (Holdings) Pty Ltd (ABN 79 137 901 752) and its controlled entities (**Lucas**) is prepared as required by the *Modern Slavery Act 2018 (Cth)* for the financial year ended 30 June 2020. This statement is submitted within the temporary extension of reporting deadlines under the Act.

Lucas has a zero-tolerance approach to modern slavery and is committed to addressing any modern slavery risks in its operations and supply chains. We have undertaken an initial risk assessment of modern slavery in our operations and supply chains. This statement outlines our progress to date and our current and future commitments.

## ***Our structure, operations and supply chains***

Lucas is a privately owned company founded in 1969 by the Lucas Family and has 5 wholly owned subsidiary entities<sup>1</sup>. Since that time, the company has experienced significant growth in business, capacity and capability expanding its core services of mining, energy and civil contracting to include civil maintenance, concrete construction, heavy haulage, bulk material supply and haulage, plant hire, bulk earthworks, logistics, remediation, marine infrastructure and development, mobile camp, air transport, survey and plant maintenance.

During the reporting period we undertook many significant projects for some of Australia's leading government organisations in mining, energy and civil construction and employed more than 320 employees.

Predominantly, Lucas contracts and partners with Australian-domiciled companies that provide specialised services in the following areas:

- construction materials and services; and
- heavy equipment parts and repair services.

From those suppliers we buy:

- concrete;
- quarry products;
- steel;
- heavy machinery parts, accessories and consumables;
- plant and equipment hire services; and
- various construction subcontract services.

In 2020, we had approximately 600 active vendors and suppliers and spent approximately \$51M with direct suppliers. Since its establishment, our core values have been the foundation of the business, reflecting who we are, what we stand for and the legacies we leave. Because of this, we have established long-term relationships with many of our suppliers, the majority of which are in Australia.

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<sup>1</sup> Lucas Total Contract Solutions (NLCG) Pty Ltd (ABN 57 160 650 993), Lucas Total Contract Solutions Pty Ltd (ABN 79 137 901 805), Lucas Total Contract Solutions (Services) Pty Ltd (ABN 82 131 802 054), Lucas Total Contract Solutions (TSM) Pty Ltd (ABN 30 164 314 443), Lucas Total Contract Solutions (Mining Services) Pty Ltd (ABN 51 137 901 690).

Utilising Lucas' Risk Management Program, which is a structured and proactive program to facilitate the early identification of hazards, assessment of risk and implementation of control measures to enable a safe working environment for all our employees and contractors, we undertook an initial risk assessment of modern slavery in our operations and supply chains. We will continue to monitor the effectiveness of actions being taken to assess and address modern slavery risks.

Potential areas identified by us where there may be some risk for modern slavery are:

- suppliers who may use products purchased or manufactured in high-risk countries; and
- products (such as cement and steel) purchased which are made in high-risk countries.

Although we have identified there are potential areas of risk for modern slavery in our business, we consider Lucas has a low risk of modern slavery in its immediate supply chains as its continued commitment to assess and address the risks (as set out below) provide robust processes and systems to identify and remedy any actual risks that may arise.

### ***Actions taken to assess and address risks***

To be able to assess the risk of modern slavery in our business we rely on our robust internal policies, processes, procedures and guidelines. The following assist us to assess and address any modern slavery risks accordingly:

- HRES-GUI-102 Code of Conduct;
- HSEC-MSP-007 Suppliers, Contractors and Project Partners;
- HSEC-MSP-003 Risk & Change Management;
- HSEC-MSP-0013 Health & Wellbeing;
- HSEC-MSP-0015 Purchasing & Procurement; and
- HSEC-PRO-110 Risk Assessment Procedure.

Lucas is committed to further enhancing governance and management to address the risks of modern slavery in our operations and supply chains. Lucas has developed a Modern Slavery Procedure, the objective of which is to assist management to implement and enforce effective systems and controls to ensure that modern slavery is not taking place within our operations and supply chains.

Lucas has also included provisions within its template supply agreements (for goods and services) addressing modern slavery. Its Senior Legal Counsel continues to update other agreements to include similar provisions to ensure that we meet our obligations under the Act.

### ***Assessing the effectiveness of our actions***

Lucas undertakes due diligence when considering new contractors and suppliers, which includes but is not limited to a pre-qualification process addressing, among other things, our obligations under the Act, which in turn assists us to identify, investigate and remedy any potential modern slavery issues that may be present.

We are also currently updating our induction training to include a fit for purpose module addressing the potential modern slavery risks identified within our operations and supply chains and educating incoming employees by providing examples of such circumstances to enable them to better identify modern slavery practices. We will also be providing this additional training to key personnel within the business.

## ***Consultation process***

The Management Leadership Team (Chief Executive Officer, Executive Director, Human Resources Manager, Operations Manager, Business Development Manager and Senior Legal Counsel) together with the Advisory Board and HSEC & Quality Manager oversee all business practices within Lucas and meet regularly to collaborate and discuss the practices of the business and how these can be improved. This statement was prepared with the collaboration from those specialists within our business.

## ***Moving forward***

Lucas continues to and is committed to further enhancing its governance to address the risks of modern slavery in our operations and supply chains through its existing Risk Management Program and internal policies, procedures and management.

This statement was approved by the Group's Advisory Board on 30 March 2021 and is available on our website.

A handwritten signature in black ink, appearing to read 'Benjamin Lucas', is positioned above the printed name.

**Benjamin Lucas**

Executive Director

Lucas Total Contract Solutions

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