

Document:		POLICY			
Title:		Modern Slavery			
Document No:		DG-PL-5008			
Document Owner:		Carmel Baldwin			
Rev No	Date	Reason	Author	Owner	Authorisation
0001	May-19	Issue on new format	Derek Rowlands	Carmel Baldwin	Steve Doocey
0002	June-20	Annual Policy review (2020)	Derek Rowlands	Carmel Baldwin	Steve Doocey Mark Doocey

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made by Doocey Group Limited pursuant to section 54, Part 5 of the Modern Slavery Act 2015 (Act). It constitutes our slavery and human trafficking statement for the 2018 financial year and sets out the steps taken that aim to ensure that slavery or human trafficking did not take place in our business and supply chain.

### OUR BUSINESS AND SUPPLY CHAIN

Our business is and involves the connection of utility networks to housing and commercial developments. As our supply chain involves several entities or projects performed by a prime contractor with a series of sub-contractors, we only exercise control over our relationship with our contractual counterparty and persons who contract with that counterparty will be performing services for the counterparty and not for other persons in the contractual chain.

The principal way in which we approach modern slavery risks in a supply chain is by using the types of procedures set out in our Policy (such as risk based due diligence and the use of antislavery terms and conditions) in the relationship with our contractual counterparties, and by seeking those counterparties to adopt a similar approach with the next part in the supply chain, and so on down the supply chain. The provision of corporate services between group entities are not treated as part of our supply chain/ making investments and making recommendations in relation to is investments is not considered to be a supply chain.

We have commitment to conduct our business and all our relationships based on integrity. This commitment is contained in our Business Conduct and Ethics Code.

During this year we:

- reviewed our anti-slavery and human trafficking policy (Policy) which reflects our commitment to:
  - implementing and enforcing effective systems and controls designed to ensure modern slavery does not occur in our business and supply chains;
  - being transparent in doing so through our disclosure obligations under the Act.;
- used risk assessments. Our efforts to prevent modern slavery are designed to be proportionate to the modern slavery risks we face, recognising that it can vary according to the jurisdictions, sectors, suppliers, the amount of control we have over our supply chain and other governance factors. Risk assessments are, therefore, integral to our attempts to eradicate modern slavery in our business and supply chains. In particular, we seek to ensure that modern slavery risk is managed as close to its source as possible, and by the management teams that have the most knowledge and expertise in the business or risk area. Modern slavery risks vary based on the characteristics of each business. The specific manner and methodologies by which these risks are addressed and mitigated vary based upon, among other things, the nature of the risks and of the assets and operations to which they apply, the geographic location of the assets, the economic, political and regulatory environment, and our assessment of the benefits to be derived from such mitigation strategies. While no practices and procedures are capable of identifying and preventing all modern slavery, our risk-based approach is designed to enable efforts to be focussed where they are most needed and can most help eradicate modern slavery.
- made available training to our staff on modern slavery risks;

- included (on a risk adjusted basis) specific prohibitions in contracts with our direct suppliers against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children;
- enabled our Policy to become embedded and understood throughout our organisation through internal and external communication;
- had a due diligence protocol in place that includes anti-slavery considerations, which applies when engaging or renewing third party suppliers;
- could, if any employee breaches our Policy, subject them to disciplinary action, which could result in dismissal for misconduct or gross misconduct;
- may terminate our relationship with other individuals and organisations working on our behalf if they breach our Policy. Factors guiding the appropriate action to be taken in a given situation will depend on our control or influence over the entity concerned, the severity of the abuse, the safest outcome for the potential victims and whether terminating the relationship with the entity itself would have adverse human rights consequences; and
- encouraged staff, our suppliers and business partners and anyone else to whom our Policy applies to report any concerns about modern slavery related to its businesses and direct supply chains in accordance with our Code and our whistle blowing policy. Our whistle-blowing policy is designed to make the reporting process as simple as possible.

Signature:



Steve Doocey

Joint Managing Director

Signature:



Mark Doocey

Joint Managing Director

Review

01/06/2020

Date:

Next Review

01/06/2021

Date: