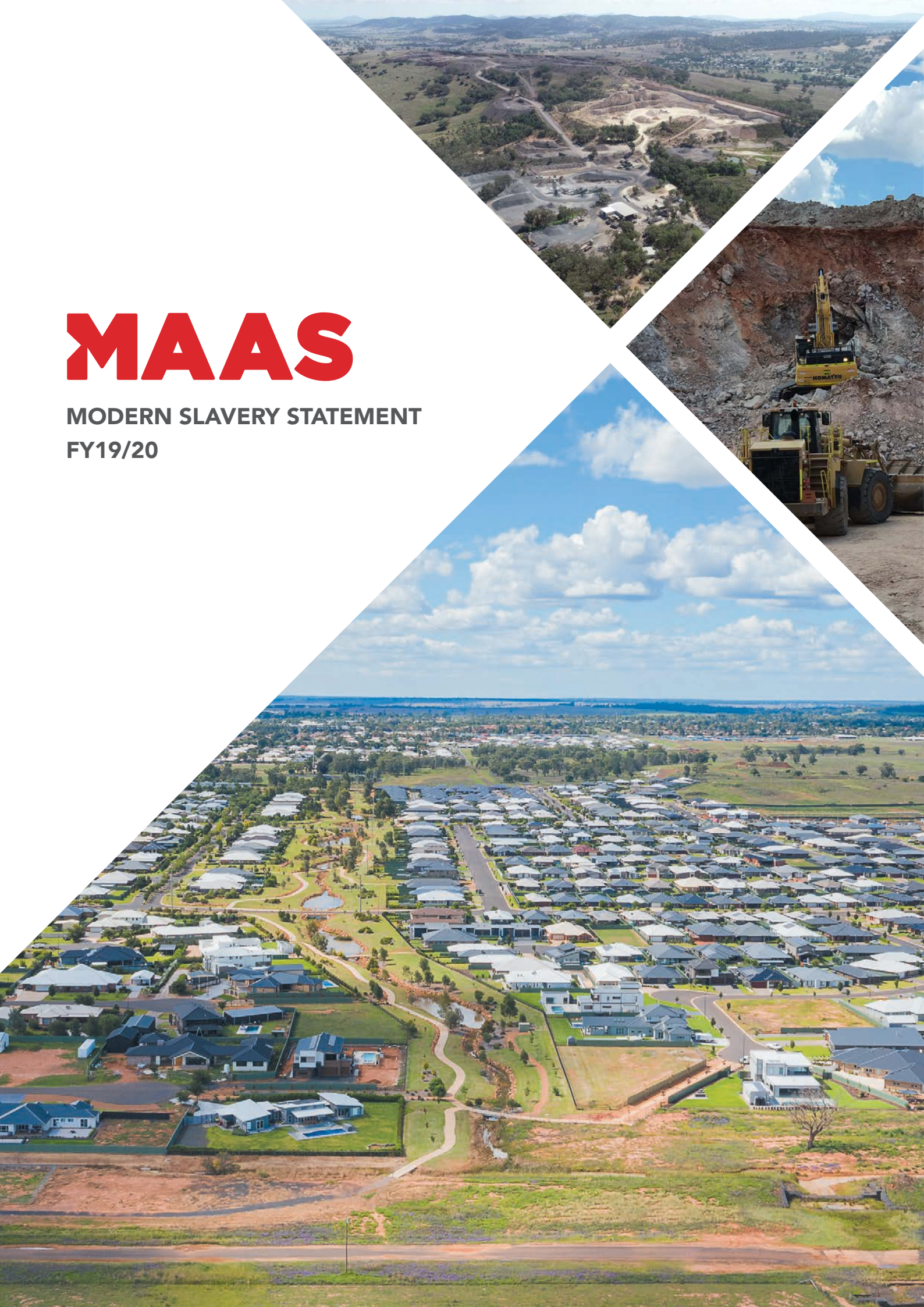


# MAAS

MODERN SLAVERY STATEMENT  
FY19/20





## MAAS GROUP COMPANIES



Maas Group Holdings Limited (ABN 84 632 994 542), on its behalf and on behalf of its Group Companies (collectively, "Maas," "we" or "our") makes the following joint Modern Slavery Statement on slavery and human trafficking, addressing the risks of Modern Slavery in our business, operations and supply chains during the financial year July 1, 2019 – June 30, 2020 (Year). This statement addresses the following:

1. Structure, Operations and Supply Chains
2. Risks of Modern Slavery in Maas Operations and Supply Chains
3. Actions to Assess and Address the Risks of Modern Slavery
4. Assessing Effectiveness of Our Actions
5. Building a Sustainable Future



## STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Maas is an Australian diversified industrial group. We provide construction materials, equipment and services across the civil, infrastructure, mining and property industries. Maas was publicly listed on the Australian Stock Exchange on 4 December 2020, following the Year. A full list of all subsidiary companies and their locations that were within the group during the Year is contained in Appendix 1.

With a team of over 900 employees, operating throughout Australasia, we support the operation of a fleet in excess of 400 items of plant and equipment. Based in Dubbo NSW, Maas operates right across Australia, with a strong presence in regional areas and a growing international presence.

During the financial year, our principal activities consisted of:

- ▶ Civil and Construction
- ▶ Construction Materials
- ▶ Manufacturing
- ▶ Real Estate

The Civil and Construction division completes civil and electrical construction of public and private infrastructure through specialised labour and the hire and supply of plant and equipment in Australia. These operations are backed by a mechanical workshop and a team dedicated to the trade of plant and equipment.

Construction Materials manages hard rock and sand quarries throughout New South Wales and Queensland. They also supply concrete products and materials for infrastructure projects. These operations are backed by a trucking fleet for the delivery of materials.

Our manufacturing operations are headquartered out of Sydney, with a plant in Vietnam and sales and support operations in Australia and Indonesia. This business division designs, engineers, fabricates and assembles a range of specialised shortcrete and underground utility vehicles. They also provide toll manufacturing solutions for companies around the world.

Our Real Estate division manages the development of residential sub-divisions and commercial property assets. The residential team manages the sale of land and house packages, as well as construction of residential dwellings. The commercial team manages the construction, leasing and sale of commercial developments.

The supply chains for all operations include external casual and permanent labour hire, including under the Australian National Employment Scheme in Australia and the Vietnamese Labour Code in Vietnam; sub-contractors, particularly trade-qualified; locally-sourced construction materials; and plant, equipment and component parts, sourced directly from manufacturers or through global plant and equipment auctions for specialised second hand products.

Maas builds and maintains strong community relationships and engages openly and constructively with community stakeholders to share information, hear concerns and solve problems. We play an active role in our local communities, supporting events, clubs and the people who need it most. In Australia, we proudly support the Clontarf Foundation, which aims to improve the education, life skills and self-esteem and hence employment prospects of young Aboriginal and Torres Strait Islander men, as well as other local community groups and events.



## RISKS OF MODERN SLAVERY IN MAAS OPERATIONS AND SUPPLY CHAINS

The risks of modern slavery in our operations and supply chain are managed through our internal risk management systems. For the Year, we are not aware of any reports of incidences related to modern slavery in our operations or supply chain.

Maas includes operations in Indonesia and Vietnam, which provides geographic expansion in the Manufacturing division. Both of these locations have higher modern slavery risks than operations within Australia. During the Year, VMS Engineering Company had 180 employees in Vietnam. The majority of employees in Vietnam work in our manufacturing facility.

Jacon design, manufacture and supply concrete pumping, spraying and transportation equipment to the global mining and construction. Outside of Australia, nine Jaco employees were located in Indonesia. These employees were employed in low-risk office-based roles. All employees were permanent employees.

Operations in Vietnam and Indonesia are closely overseen by our General Manager Manufacturing & Global Supply Chain,

who reports to our Group Chief Executive Officer, both located in Australia. Employees in Vietnam and Indonesia are covered by our Group employment policies, including those relating to health and safety, equal employment opportunity, diversity, training, anti-discrimination and harassment, freedom of association, sustainability, community and more, relevant to their roles. Local requirements related to leave and entitlements are carefully reviewed and followed. Record keeping, such as time sheets, near miss incidents, etc, is conducted locally and reviewed by our General Manager Manufacturing & Global Supply Chain.

Maas recognises that modern slavery risks may also be present in our supply chain, particularly external labour hire. We do not use labour hire suppliers for our operations overseas. We believe our construction and manufacturer suppliers do not currently present a risk of modern slavery practices within the first tier of our supply chain (and likely beyond), since our suppliers are large multi-national companies who report on this issue as required by legislation both in the UK and Australia, or voluntarily. However, we recognise that there may be risks of modern slavery further down our supply chain of which we are not currently aware.



## ACTIONS TO ASSESS AND ADDRESS THE RISKS OF MODERN SLAVERY

Maas is committed to conducting business with honesty and integrity.

Maas requires employees to uphold high standards of personal, professional and business behaviour, particularly when entering into contractual arrangements with third parties and external entities. These standards are clearly outlined in our Code of Conduct and policies, listed below. Maas ensures that employees, business partners and third parties are informed of our expectations and offered training (regularly for key personnel). All employees, officers, contractors, and associates of Maas have a responsibility to help detect, prevent and report instances wrongdoing.

Maas expects all directors of the Board, as well as all officers, employees, contractors, consultants, other persons that act on behalf of our company, and associates of our company, to act consistently with our Code of Conduct.

The Code of Conduct includes the following aspects, which address human rights-related issues:

- ▶ Discrimination, bullying, harassment or vilification in the workplace will not be tolerated by the Company
- ▶ Maas is committed to ensuring the health and safety of its employees, consultants, contractors and visitors to its workplace and any other persons who we work with
- ▶ Personnel must not knowingly participate in any illegal or unethical activity
- ▶ Personnel must comply with all laws and regulations

The Code provides more detail on each of these aspects and is publicly available on the Maas website.

Employees complete training on the Code of Conduct during their induction. In addition, specific training may also be provided where applicable, including:

- ▶ Induction training
- ▶ Regular toolbox talks

- ▶ Ad-hoc incident alerts and near miss notifications
- ▶ Additional skills-based or job-specific training

Any breach of human rights laws and principles by employees is regarded as serious misconduct, leading to disciplinary action which may include termination of employment. This may also breach applicable modern slavery laws and expose an individual or the company to criminal and civil liability, which could result in imprisonment or the imposition of a significant financial penalty.

We require employees to comply with investigations into alleged or suspected human rights' breaches.

All employees are expected to report breaches or suspected breaches relating to human rights directly to senior management or in accordance with the whistleblower policy. Employees are encouraged to raise concerns about any issue or suspicion of misconduct at the earliest possible stage with management. Our corporate policies and management processes would mean any potential human rights risks would be captured on our Non-Conformance Register, which is reviewed by executive management and the Board.

Maas is committed to ensuring that all employees have a safe reliable and confidential way of reporting misconduct. Our whistleblower policy affords certain protections under Australia's whistleblowing regime, regardless of where the alleged misconduct has occurred. This includes honouring an obligation to protect genuine whistleblowers who come forward from retaliation. Whistleblower protection is an important tool in helping identify wrongdoing that may not otherwise be uncovered. Our policy is designed to encourage people to speak up when they become aware of potential wrongdoing; ensure disclosure is safe, secure, protected and supported; ensure disclosures of potential wrongdoing are dealt with appropriately and on a timely basis; provide transparency around our disclosure framework; explain available protections to whistleblowers;



deter wrongdoing in line with our risk management and governance framework; and support our values and Code of Conduct.

The results of any formal investigation into misconduct will be recorded in writing in a formal internal report that will be confidential and is the property of the Company. The outcome of any investigation will be reported to the Board of the Company. The method for documenting and reporting the findings of any investigation will depend on the nature of the disclosure.

The formal report recording the results of an investigation will not be provided to a discloser or any other person subject to an investigation.

Maas is committed to ensuring that internal control systems and procedures are subject to regular audits and reviews to provide assurance that they are effective.

For the Year, we are not aware of any reports of incidences related to modern slavery in our operations or supply chain.

Safety of our workforce will always remain our highest priority. This belief drives a strong commitment to the health, safety and wellbeing of our workers which is supported by our work, health and safety (WHS) management

systems and practices which are wide-ranging and tailored to the risk profile of each business unit. Business units maintain accredited WHS management systems. Our WHS management systems are underpinned by effective consultation and risk management protocols that aim to protect workers from harm, ensure legislative compliance and secure safety standards. We understand that genuine consultation results in empowered workers who take ownership and provide innovation solutions to uphold WHS standards. Likewise, ongoing communication facilitates engaged and accountable leadership which creates trust and a positive safety culture within the workforce. Maas risk management strategies focus on hazard mitigation and aim to deliver a targeted, risk-based approach to prioritise areas of greatest risk.

During the Year, efforts to reduce the risk of spreading the COVID-19 virus were a priority. Working safely in our manufacturing facility in Vietnam has been a particular focus during the pandemic, since working safely in close proximity in these kind of facilities may carry higher risk of covid transmission. We had no confirmed transmission in any of our workplaces during the Year.

Maas currently offers an employee assistance program (EAP) to all employees in Australia and their families. The EAP offers confidential telephone counselling and psychological assistance.



## ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Maas listed on 4 December 2020 and many of our policies were under development during the Year. All policies, once finalised, are scheduled for regular review, no more than five years from previous approval. Maas believes we can more thoroughly review specific modern slavery risks in certain geographies and the supply chain and we have engaged independent advice to identify and act on any gaps and opportunities.

As part of an effective approach to risk management, the Board has established an Audit and Risk Committee. The Board through the Audit and Risk Committee reviews and evaluates the effectiveness of the Group's risk management framework, including whether it is operating within the risk appetite set by the Board. This is reviewed each year.

Because Maas listed during the 2020/21 financial year, the first full year of this committee is the 2021/22 financial year and the first formal review of our risk management framework is due to be completed during that year. The Board through the Audit and Risk Committee continues to work with management and review and evaluate the effectiveness of current risk management and internal controls.

Maas publishes a corporate governance statement each year that further outlines our approach to governance and risk

management, in line with the ASX Corporate Governance Principles and Recommendations (4th edition). In addition, we report on material environmental and social risks in our annual report.

To ensure that our practices and policies are appropriate, Maas also engages independent third parties to conduct relevant reviews and assessments.

Our operations in Vietnam carried ISO 9001 quality management certification prior to acquisition. Maas is currently undergoing assessment for this certification. The certification principles cover aspects related to customer focus; leadership; engagement of people; process approach; improvement; evidence-based decision making; and relationship management, all of which contribute to better risk management and identification of possible modern slavery risks. Certification involves independent audit of the operations by a third party and is reviewed annually.

During the Year, certifications also applied to JLE Electrical, including:

- ▶ AS/NZS 4801 OHS Management System
- ▶ ISO 9001 AS/NZS 4801 Integrated Management System
- ▶ ISO 9001 Quality Management System





## BUILDING A SUSTAINABLE FUTURE FOR ALL

Maas is committed to building a sustainable future, free from modern slavery. We value the importance of strong relationships with the communities in which we operate and believe that nurturing community and local industry relationships is key to our social responsibility. We actively provide full, fair, and reasonable opportunities for local industry to take part in our projects.

Through active community participation and contribution, we develop positive, meaningful, and long-lasting relationships built on mutual understanding, respect, and trust within the communities that we operate.

Maas partners with the Clontarf Foundation. The Clontarf Foundation works to improve the education, discipline,

life skills, self-esteem and employment prospects of young Aboriginal and Torres Strait Islander men throughout regional Australia.

Maas believes partnerships like The Clontarf Foundation are of great benefit to our business and the communities in which we work. Promoting cultural recognition and equal opportunities within our communities is paramount to our business philosophy; we look forward to the opportunity to continue this further. Reducing inequality for groups like these young men helps to remove a key risk for disadvantage and poverty. We also support Give Me 5 for Kids, Dubbo Children's Hospital, Dubbo and District Junior Rugby League and sponsor The Macquarie Titan Mud Run and many other small regional events in the communities we operate.



## APPENDIX 1: MAAS COMPANIES AS AT 30 JUNE 2020

Division	Name	Location
Civil & Construction	EMS Admin Pty Ltd	Australia
Civil & Construction	EMS Equipment Hire Pty Ltd	Australia
Civil & Construction	EMS Group Pty Ltd	Australia
Civil & Construction	EMS Labour Hire Pty Ltd	Australia
Civil & Construction	EMS Mine Site Electrical Pty Ltd	Australia
Civil & Construction	EMS Plant & Equipment Pty Ltd	Australia
Civil & Construction	EMS Repairs Pty Ltd	Australia
Civil & Construction	Hamcon Civil Pty Ltd	Australia
Civil & Construction	Hamcon Hire Pty Ltd	Australia
Civil & Construction	JLE Admin Pty Limited	Australia
Civil & Construction	JLE Electrical Projects Pty Limited	Australia
Civil & Construction	JLE Engineering Pty Limited	Australia
Civil & Construction	JLE Group Holdings Pty Ltd	Australia
Civil & Construction	JLE Hire Pty Limited	Australia
Civil & Construction	JLE Manufacturing Pty Limited	Australia
Civil & Construction	JLE Utilities Services Pty Limited	Australia
Civil & Construction	Large Industries Pty Ltd	Australia
Civil & Construction	Maas Civil Pty Ltd	Australia
Civil & Construction	Maas Group Pty Ltd	Australia
Civil & Construction	Maas Plant Hire Pty Ltd	Australia
Civil & Construction	Machinery Sales Pty Ltd	Australia
Civil & Construction	Amcor Excavations Pty Ltd	Australia
Construction Materials	Miller Metals Forbes Pty Ltd	Australia
Construction Materials	Regional Concrete Australia Pty Ltd	Australia
Construction Materials	Regional Crushing & Screening Pty Ltd	Australia
Construction Materials	Regional Group Australia Pty Ltd	Australia
Construction Materials	Regional Group Resources Pty Limited	Australia
Construction Materials	Regional Hardrock (Forbes) Pty Ltd - atf	Australia
Construction Materials	Regional Hardrock (Orange) Pty Ltd	Australia
Construction Materials	Regional Hardrock (West Wyalong) Pty Ltd - atf	Australia
Construction Materials	Regional Hardrock Gilgandra Unit Trust	Australia
Construction Materials	Regional Hardrock Unit Trust	Australia
Construction Materials	Regional Hardrock(Dubbo) Pty Ltd	Australia
Construction Materials	Regional Precast Australia Pty Ltd	Australia
Construction Materials	Regional Quarries Australia Pty Ltd	Australia
Construction Materials	Regional Sands	Australia
Construction Materials	Regional Sands Dubbo Unit Trust	Australia
Construction Materials	Regional Transport Spares Pty Ltd	Australia
Construction Materials	Sands Quarry Australia	Australia
Construction Materials	Macquarie Geotechnical Pty Ltd	Australia
Construction Materials	Gracemere Property Pty Ltd (acquired June 2020)	Australia
Construction Materials	Regional Hardrock Willow Tree Unit Trust (acquired May 2020)	Australia
Construction Materials	Amcor Quarries & Concrete Pty Ltd	Australia

Corporate	Maas Administration Pty Ltd	Australia
Corporate	Maas Group Holdings Ltd	Australia
Manufacturing	EMS International Pty Ltd	Australia
Manufacturing	EMS Sales Pty Ltd	Australia
Manufacturing	Global Manufacturing Vietnam Limited	Vietnam
Manufacturing	Jacon Australia Pty Ltd	Australia
Manufacturing	Jacon Technologies Pty Ltd	Indonesia
Manufacturing	VMS Engineering Company Ltd	Vietnam
Real Estate	Bizitay Pty Limited	Australia
Real Estate	Eykan Holdings Pty Ltd	Australia
Real Estate	Maas Group Developments Pty Ltd	Australia
Real Estate	Maas Group Properties Arcadia Pty Limited	Australia
Real Estate	Maas Group Properties Bombira Pty Ltd	Australia
Real Estate	Maas Group Properties Durham Park Pty Ltd	Australia
Real Estate	Maas Group Properties Fairydale Pty Ltd	Australia
Real Estate	Maas Group Properties Highlands Pty Ltd	Australia
Real Estate	Maas Group Properties Magnolia Pty Ltd	Australia
Real Estate	Maas Group Properties Southlakes Pty Ltd	Australia
Real Estate	Maas Group Properties Ulan Pty Ltd	Australia
Real Estate	Maas Group Westwinds Pty Limited	Australia
Real Estate	Maas Homes Pty Ltd	Australia
Real Estate	Southlakes Childcare Centre Pty Ltd	Australia

**MAAS**