



Engineering Building & Infrastructure (EBNI) – Modern Slavery and Worker Welfare Policy

The Following Modern Slavery and Worker Welfare Policy reflects EBNI's firm commitment to ethical labour practices, robust safety and health standards, and full compliance with the Modern Slavery Acts and WHS laws. It has been approved by the Board of Directors of Engineering Building & Infrastructure Pty Ltd.

1. Introduction

Engineering Building & Infrastructure Pty Ltd (EBNI) is committed to upholding human rights and eliminating modern slavery in all its operations and supply chains. We explicitly oppose all forms of forced labour, child labour, debt bondage, servitude, trafficking or similar exploitative practices. Leading industry policies similarly declare that companies “oppose modern slavery in all its forms” and commit to the “highest ethical standards”. EBNI’s policy aligns with Australian law – in particular the Commonwealth *Modern Slavery Act 2018 (Cth)* and the NSW [Modern Slavery Act 2018 \(No. 30\)](#) – which mandate annual reporting on slavery risks and actions. For example, the NSW Act’s objects include “**to combat modern slavery**” and require risk reporting and training within supply chains [legislation](#). In accordance with these [laws](#), EBNI will annually assess and publicly report on modern slavery risks in our operations and supply chain, and on the effectiveness of our mitigation measures with [human rights](#). This policy has been endorsed by the EBNI Board and applies to all personnel and contractors involved in our projects.

2. Structure, Operations and Supply Chains

EBNI is a national construction firm specializing in roads, bridges, tunnels and high-rise infrastructure. We operate across multiple Australian states on both public-sector and private-sector projects. Our projects typically involve complex, multi-layered supply chains with numerous subcontractors and suppliers. Key elements of our supply chain include:

- **Engineering and Construction Services:** Civil, structural and electrical contractors engaged to deliver project works.
- **Materials Suppliers:** Providers of raw and manufactured materials (e.g. steel, concrete, asphalt, timber, glass).
- **Equipment and Plant Hire:** Companies supplying machinery and vehicles.



- **Labour Hire and Subcontractors:** Workforce providers for skilled and unskilled trades.
- **Professional Services:** Surveyors, consultants, and specialist contractors (e.g. design, environmental, surveying services).

Each category is subject to its own risks. In particular, supply chain segments involving **overseas sourcing or low-skilled migrant labour** are known to carry higher modern slavery risks. As one legal analysis notes, the construction industry is “**susceptible to modern slavery practices because of the complex and multi-layered supply chains**” and the presence of vulnerable workers performing dangerous, physically demanding tasks under tight deadlines. We recognize that raw materials (such as timber or manufactured components) from countries with weak labor protections may also pose significant risks of exploitation.

3. Risk Assessment and Key Risk Factors

EBNI differentiates between direct and indirect risks of modern slavery. Our **direct labour practices** (EBNI’s own employees) fully comply with Australian workplace laws, wages and safety regulations, so direct slavery risk is minimal. **Indirect risks**, however, arise through our supply chain and project conditions. Key risk factors we have identified include:

- **Procurement and Supply Chain Complexity:** Extensive subcontracting layers and the use of multiple suppliers (often with offshore manufacturers) increases the chance of slavery “slipping through the cracks.” The ILO has found that the construction sector accounts for a significant share of forced labour cases, with **16.3% of [reported forced labor incidents](#)** occurring in construction. Labor brokers and agencies recruiting migrant workers (often in debt bondage) are common in our sector, making careful vetting essential.
- **Budget and Timeline Pressures:** Tight project budgets and aggressive schedules are a known driver of exploitation. Industry reports warn that “**low profit margins and pressing deadlines**” lead companies to cut corners on labour standards. Likewise, the Supply Chain Sustainability School notes that “tight deadlines can lead to businesses overlooking standard recruitment protocols, increasing the risk of forced labour slipping into the supply chain”. We therefore identify any project clauses or tender conditions that unduly penalize delays or enforce unrealistic timelines as red flags, since they can force subcontractors to demand excessive overtime for low pay.
- **Subcontracted and Migrant Labour:** Outsourced labour (subcontracting) is a major risk factor. Workers supplied through third parties may not have their rights protected. Long working hours, low pay and lack of clear contracts are common exploitative triggers [modern slavery](#). In our industry, many workers are migrants who may be unfamiliar with Australian rights, making them vulnerable to debt and recruitment fraud. EBNI recognizes this and focuses additional scrutiny on labour



hire firms and specialist trades.

- **Site Conditions and WHS Hazards:** The very nature of construction work means dangerous and stressful conditions. Research by NIOSH highlights that **high job demands, low control and inadequate support** on construction sites heighten [stress](#) levels and “**poor safety outcomes (e.g., higher injury rates)**”. In worst cases, forced labour victims are “**more vulnerable to being coerced into working in unsafe conditions that disregard occupational safety and health**”. Poor lighting, hazardous materials or lack of protective equipment – all risks if corners are cut – can severely endanger exploited workers. EBNI’s risk analysis explicitly includes these psychosocial and safety factors: we flag any signs of excessive stress, bullying or unsafe work that might indicate an underlying labor abuse.

4. Mitigation Measures and Procurement Standards

To address these risks, EBNI has implemented robust controls and procurement procedures:

- **Supplier Code of Conduct:** EBNI requires all suppliers, subcontractors and partners to adhere to our Code of Conduct, which mandates compliance with all labour laws, the prohibition of slavery-like practices, and respect for worker rights. This code (included in contracts) echoes best-practice standards such as prohibiting forced labour and child labour, paying at least a living wage, and limiting excessive hours.
- **Sustainable Procurement Policy:** We apply a risk-based approach to purchasing. Higher-risk categories (e.g. overseas materials, labour hire) are sourced only from suppliers who demonstrate ethical credentials. At the procurement stage we use formal screening procedures to assess suppliers’ policies and practices. This includes prequalification questionnaires, site visits and certifications (such as modern slavery statements or industry codes).
- **Contractual Protections:** EBNI’s contracts explicitly address labour and safety. We include clauses that require suppliers to allow audits of their practices, maintain payroll records, and promptly address any findings of non-compliance. For example, suppliers must permit EBNI (or third-party auditors) to verify that workers are free to leave employment and are paid correctly. Penalties or termination rights are in place if a contractor is found to have violated these terms.
- **Project Scheduling and Extensions:** In line with legal guidance, we balance our commercial requirements against worker welfare. If unexpected delays occur, EBNI will, where practicable, grant extensions of time rather than force contractors to accelerate work by overworking crews. This avoids situations where workers would otherwise have to work unsafe hours (a known cause of accidents and labour abuses).
- **Whistleblower and Reporting Channels:** We maintain confidential reporting mechanisms (hotlines and email) so that any worker or stakeholder can raise concerns about labour exploitation or unsafe practices without fear of retaliation. All



reports are promptly investigated by management.

- **Training and Awareness:** All EBNI employees (from executives to site supervisors) and key suppliers receive training on modern slavery risks and on our labour/health-safety standards. We ensure that procurement and project teams can identify indicators of exploitation. This includes training on the Work Health and Safety Act obligations and on recognising psychosocial hazards (e.g. stress, intimidation or isolation of workers).

These measures are aligned with industry best practices. For example, legal experts recommend that companies “screen and evaluate contractors and suppliers” at the procurement stage and build strong audit and remediation rights into contracts. EBNI’s processes reflect these guidelines.

5. Work Health, Safety and Wellbeing

EBNI views worker welfare holistically. Our commitment to modern slavery compliance is inseparable from our obligation to provide a safe, healthy workplace. As a PCBU under Australia’s Work Health and Safety laws, EBNI has a **primary duty to ensure workers are not exposed to [psychosocial hazards](#)**. This means we actively manage risks like excessive workloads, inadequate training, poor support or harassment that could harm mental health. Specifically:

- **Site Safety Programs:** Before work begins, EBNI conducts comprehensive WHS hazard assessments on every site, implements safety plans, and provides all necessary personal protective equipment (PPE) and training. Toolbox talks and regular safety meetings remind crews of safe work procedures. We know, for example, that “unsafe conditions” and worker fatigue are risk factors for both accidents and abuse, so we enforce rest breaks, equipment maintenance and incident reporting diligently.
- **Mental Health Support:** Recognizing research that construction workers face high stress and suicide rates, EBNI promotes mental wellbeing. We provide access to counselling services (EAP), mental health first-aiders on-site, and training on stress management. For instance, studies show that low job control and high demands can markedly increase injury and illness rates; in response we design jobs with realistic targets and involve workers in planning to improve job satisfaction. We also foster a no-bullying culture.
- **Compliance and Review:** EBNI’s safety officers audit psychosocial risks as part of regular safety inspections. Any issues affecting morale or productivity (which can be early warnings of exploitation) are investigated. Through these WHS processes we not only protect physical health, but also support the mental and emotional wellbeing of every worker on our sites.



In this way, EBNI ensures that *WHS compliance goes hand-in-hand with human rights*. We explicitly recognize that modern slavery **creates WHS hazards**: for example, a worker who has been coerced into labour is far less likely to refuse unsafe work. Our policies therefore bridge these domains: upholding safety standards and treating every worker with dignity are two sides of the same commitment.

6. Monitoring, Reporting and Effectiveness

EBNI continually monitors the effectiveness of its anti-slavery measures. In line with the Modern Slavery Act's requirements, we track key performance indicators such as: the number of suppliers assessed for slavery risk; audit findings and corrective actions; training completion rates among staff and contractors; and reports received through our whistleblower channels. These metrics are reviewed quarterly by senior management and annually by the Board. By tracking trends (for example, repeated issues with a particular supplier) we can refine our controls.

We will prepare and publish an annual Modern Slavery Statement summarizing our risk assessment, actions and outcomes, as mandated for large entities. This statement will include a review of how effectively our policies have been implemented. For example, Corrs Chambers notes that companies should detail “whether the business has conducted due diligence on suppliers, provided training, and monitored compliance”; EBNI's reporting will cover these elements. Any incidents of non-compliance or allegations of labour abuse are also documented, investigated and disclosed in aggregate (with identifying details protected) to ensure transparency and accountability.

7. Stakeholder Consultation and Industry Engagement

The development and ongoing refinement of this policy involve extensive consultation. Internally, our procurement, legal, project management and WHS teams have collaborated to identify risks and controls. We also engage directly with key subcontractors and major suppliers to communicate EBNI's expectations and to gather feedback on implementation. Externally, EBNI participates in industry forums and collaborates with initiatives like the Supply Chain Sustainability School to stay abreast of emerging risks and share best practices. These partnerships help us benchmark against peers and continuously improve our approach.

8. Continuous Improvement and Next Steps

EBNI is committed to a cycle of continuous improvement. In the coming year we will:

- **Expand Supplier Risk Assessments:** We will enlarge the scope of our due-diligence audits, especially in higher-risk sectors (e.g. overseas material imports and labour hire).



- **Enhance Training:** We plan to roll out more advanced training modules, including scenario-based workshops for project managers and site supervisors, and awareness sessions for all workers on their rights and the signs of labour exploitation.
- **Centralized Risk Tracking:** We aim to implement a digital platform to record all modern slavery assessments, audit results and remediation actions, ensuring no issue falls through the cracks.
- **Engage in Regulatory and Industry Forums:** We will remain active in the broader effort to combat modern slavery. As Corrs advises, businesses should continually “review policies and procedures, procurement processes, [and] standard contract terms” to stay ahead of risks. EBNI will participate in any relevant government or industry consultations (e.g. NSW Anti-Slavery Commissioner initiatives) to align our practices with evolving standards.

9. Understanding of Reasonable Steps

EBNI acknowledges that ‘reasonable steps’ entail proactive measures to prevent, identify, mitigate, and remedy modern slavery risks within our operations and supply chains. This includes:

- **Commitment:** Establishing and maintaining policies and procedures that demonstrate our dedication to combating modern slavery.
- **Risk Assessment:** Identifying areas within our operations and supply chains that are susceptible to modern slavery risks.
- **Mitigation Strategies:** Implementing controls to address identified risks.
- **Remediation:** Taking corrective actions when instances of modern slavery are identified.
- **Monitoring and Reporting:** Regularly reviewing the effectiveness of our measures and reporting on our progress.

This approach aligns with the GRS, which emphasizes the importance of integrating modern slavery risk management into existing governance and procurement frameworks.

10. EBNI's Capability to Take Reasonable Steps

a. Commitment and Governance

- **Modern Slavery Policy [Adoption](#):** EBNI has implemented a comprehensive Modern Slavery Policy that outlines our commitment to ethical practices and sets expectations for our employees and suppliers.
- **Code of Conduct:** Our Supplier Code of Conduct mandates adherence to labor laws and human rights standards.

b. Risk Assessment and Due Diligence



- **Supply Chain Mapping:** We conduct thorough mapping of our supply chains to identify high-risk areas, particularly focusing on overseas suppliers and labor hire arrangements.

Inherent Risk Identification Tool: EBNI utilizes tools recommended by the NSW Anti-slavery Commissioner to assess inherent risks in our procurement activities.

c. Mitigation Strategies

- **Contractual Controls** [Community & Justice](#): We incorporate model contract clauses that require suppliers to take steps to prevent modern slavery in their operations.
Training and Awareness: EBNI provides training to employees and key suppliers to recognize and address modern slavery risks.

d. Remediation and Reporting

- **Whistleblower Mechanism:** A confidential reporting system is in place to allow stakeholders to report concerns related to modern slavery.
- **Incident Response Plan:** We have established procedures to respond to and remediate any identified instances of modern slavery.

e. Monitoring and Continuous Improvement

- **Regular Audits:** EBNI conducts periodic audits of high-risk suppliers to ensure compliance with our standards.
- **Performance Metrics:** We track key performance indicators related to modern slavery risk management and report on our progress in our annual reports.

11. Specific Measures for the Tendered Project

For the tendered project, EBNI proposes the following specific measures:

- **Pre-Contractual Due Diligence:** Conducting assessments of all potential subcontractors and suppliers to evaluate their modern slavery risk profiles.
Contractual Obligations: Including specific clauses in contracts that require compliance with modern slavery laws and our Supplier Code of Conduct.
- **Site-Level Controls:** Implementing on-site monitoring to ensure labor practices meet our standards, including verifying the legitimacy of labor hire arrangements.
- **Worker Engagement:** Providing channels for workers to voice concerns and ensuring they are aware of their rights.
- **Collaboration with Stakeholders:** Engaging with industry bodies and the NSW Anti-slavery Commissioner's office to stay informed on best practices and emerging risks.

This policy will be reviewed at least annually or whenever there is a significant change in our operations or legal requirements. Any updates will be approved by the Board. The next review date 11/07/2026.