

Ahrens Group Pty Ltd (Ahrens) is a vertically integrated business operating six diverse divisions:

- **Design & Construction** - specialising in industrial and commercial buildings; retail refurbishment and fitout, ATM installations, and engineering projects specialising in the grain and food industry.
- **Mining Services** – specialising in construction and maintenance, mining infrastructure, refurbishments, electrical and HVAC, servicing regional and remote areas
- **Rural infrastructure** - specialising in grain storage and sheds.
- **Water Storage Infrastructure** – specialising in rural, commercial and export water tanks, inspection, maintenance and refurbishment.
- **Steel Fabrication & Components** – specialising in structural steel, cladding, mechanical, piping, platework, machining and blast and paint.
- **Energy** – specialising in low voltage, high voltage electrical construction & maintenance services, Remote Areas Energy generation and distribution & retailing.

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, as set out below. Each of these types of Modern Slavery involve coercion, threats or deception and have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain;

- **Trafficking in persons** - recruitment, harbouring and movement of a person for exploitation through slavery
- **Slavery** - the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.
- **Servitude** - the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work.
- **Forced labour** - the victim is either not free to stop working or not free to leave their place of work
- **Forced marriage** - Coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony
- **Debt bondage** - Victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined
- **Child labour** - Where children are:
  - exploited through slavery or similar practices, including for sexual exploitation; or
  - engaged in hazardous work which may harm their health, safety or morals; or
  - used to produce or traffic drugs.

\*The worst forms of child labour can occur in a variety of contexts and industries. This may include orphanage trafficking and slavery in residential care institutions, as well as child labour in factories and manufacturing sites, mining and agriculture
- **Deceptive recruiting for labour or services** – the victim is deceived about whether they will be exploited through a type of Modern Slavery

### Commitment

Ahrens is committed to:

- Acting ethically and with integrity in all our business dealings and relationships
- Implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere in our own business or in any of our supply chains
- Ensuring there is transparency in our own business and in our approach to tackling Modern Slavery throughout our supply chains
- Complying with local, national and other applicable laws and regulations in the areas in which the businesses operate including the Australian Modern Slavery Act 2018 (the Act)
- Applying a continuous improvement approach to how we reduce the risk of Modern Slavery practices within our business and supply chain

## Responsibility

The board of directors of Ahrens has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Ahrens acknowledges that it is accountable for addressing Modern Slavery issues in our business and supply chain and will nominate a specified individual or role to be responsible for co-ordinating management of this risk.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

The prevention, detection and reporting of Modern Slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy in accordance with the Ahrens Code of Conduct.

A copy of this Policy shall be displayed and it is the responsibility of management and supervisory staff to ensure that it is understood, implemented and maintained at all levels in Ahrens.

## Supply Chain

Ahrens requires its supply chain to abide by the requirements of the Modern Slavery Act 2018 in accordance with our Supplier Code of Conduct. Ahrens expects the same high standards from all of its supply chain and other business partners and that they will hold their own supply chain to these standards.

Ahrens will:

- Communicate Ahrens's commitment to addressing the issue of Modern Slavery to our supply chain & business partners
- Engage with our supply chain to promote and support anti-slavery practices
- Source products and services in accordance with legal obligations and community expectations while working with our supply chain to improve their anti-slavery practices
- Include anti-slavery obligations in relevant supply chain documents and contracts
- Perform due diligence on our supply chain assess their commitment to preventing Modern Slavery as appropriate for their business
- Where appropriate, work with our supply chain and business partners to remediate any identified instances of Modern Slavery

## Communication, Training and Awareness

Ahrens will provide regular training to all our employees on this policy. This will include training on how to identify Modern Slavery practices and the aspects of our business and supply chain which are subject to a greater risk of Modern Slavery practices.

## Reporting Concerns of Modern Slavery

Employees are encouraged to raise concerns with their manager, about any actual or suspected instances of Modern Slavery in any part of our business or supply chain.

Ahrens is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that Modern Slavery of whatever form is or may be taking place in any part of our business or in any of our supply chains. Ahrens Whistleblower Protection Policy outlines the protection provided to someone who makes a report.

In Australia, the Australian Federal Police is responsible for investigating suspected cases of Modern Slavery and can be contacted on 131 237 to discuss or report a suspected case. Contact can be made anonymously.

In an emergency and if someone is in immediate danger, please call Triple Zero (000) for police assistance.



**Stefan Ahrens**  
Managing Director, Ahrens Group Pty Ltd

