



# Modern Slavery Statement 2025



## 1. Background

The *Modern Slavery Act 2018* (Cth) (the **Act**) establishes the obligations of Australian businesses to identify, address, and report on modern slavery risks within their operations and supply chains. The Act also contributes to global efforts to eradicate modern slavery. According to the Walk Free Foundation, Australia ranks among the top countries—alongside the United Kingdom and the Netherlands—for its governmental response to modern slavery with a government response rate of 67/100.

In 2021, it was estimated that 50 million people worldwide were living in conditions of modern slavery. This figure includes approximately 28 million in forced labour and 22 million in forced marriages, marking a significant increase of 10 million people since 2018. The 2023 Global Slavery Index estimated that 41,000 people were living in modern slavery in Australia, equating to a prevalence of 1.6 per 1,000 people. Furthermore, Australia imports an estimated USD 7.4 billion worth of goods annually that are considered at risk of being produced through modern slavery. These high-risk imports include electronics, textiles, seafood, garments and textiles and cocoa.

Under the Act, modern slavery is defined to encompass eight severe forms of exploitation:

- Trafficking in persons
- Slavery
- Servitude
- Forced marriage
- Forced labour
- Debt Bondage
- Child labour
- Deceptive recruiting for labour or services.

These practices are recognised as significant human rights violations and are addressed under the Act which aims to prevent and respond to modern slavery.

At Ausenco, we are committed to meeting our responsibilities under the Act and supporting the protection of human rights. We aim to operate ethically and with integrity, and we take steps to identify and manage the risks of modern slavery in our operations and supply chains. Our goal is to maintain a safe and respectful environment for everyone we work with.

### 1.1 Reporting Entity

This is Ausenco's sixth year of reporting under the Act. This joint statement is made in respect of Ausenco Pty Ltd (ACN 114 541 114), and its related bodies corporate set out in Appendix 1, for the period 30 June 2024 to 30 June 2025. This statement was approved by the Board of Directors and the Ausenco Audit and Risk Management Committee (ARMC) in their capacity as the principal governing body of Ausenco Pty Ltd on 24 June 2025. As of 2024, Ausenco's Canadian entities are also required to report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C. 2023* (Canadian Supply Chains Act).

1.2 Stakeholder Consultation

During the reporting period covered by this Statement, Ausenco engaged and consulted with its related bodies corporate outlined in Appendix 1 and internal stakeholders. The actions outlined in this Statement were implemented in consultation with Ausenco’s Legal Team, People and Performance Team, Procurement, and Vendor Team.

In May 2025, Ausenco launched a global Business Ethics training program, which is expected to be completed by the end of the year. This mandatory training is designed for all personnel and provides an overview of Ausenco’s Business Ethics framework. It also covers relevant legislative requirements, including modern slavery laws in both Canada and Australia.

2. Our business structure and operations

Ausenco is a global engineering consulting company, with its headquarters located in in Brisbane, Australia. We are a global company redefining what’s possible. The team is based out of 21 offices working across five continents to deliver services worldwide. Combining deep technical expertise with a 30-year track record, we deliver innovative, value-add consulting, studies, project delivery, asset operations and maintenance solutions to the minerals and metals and industrial sectors. We find a better way.

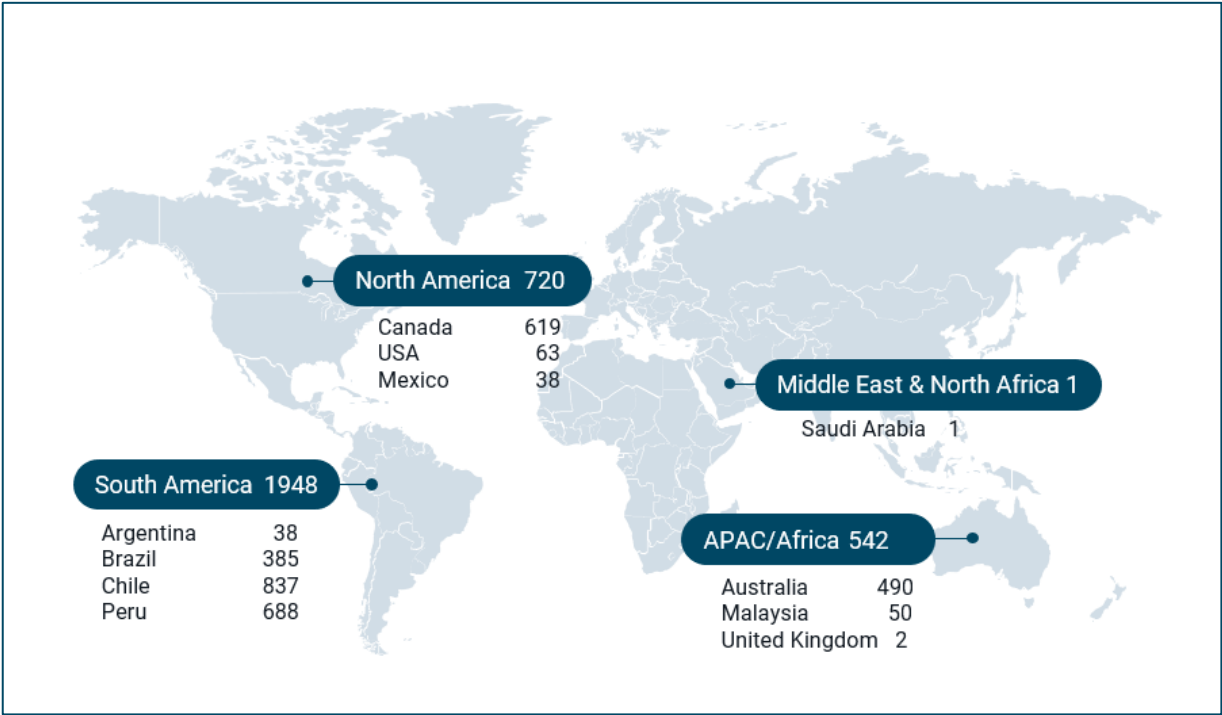


Figure 1.1 Highlights of People in various Ausenco offices around the world

Throughout our growth, our commitment to innovation never wavered. We are still dedicated to finding ingenious solutions that create value for our clients - on every project. We are always looking to deliver practical solutions to complex problems – and sometimes that means pushing the boundaries of what has been done before.

We are also committed to having a positive impact on the world around us. Wherever we work, we strive to collaborate with clients and communities to achieve truly sustainable outcomes in health, safety, the environment and community.

## 2.1 Our Values

Our core values are the cornerstone of everything we do. They enable us to discover through ingenuity and lead by example.

### Safety in all we do

Regardless of where our people work across the globe, they deserve to be safe and feel safe. We let nothing compromise our safety performance and have safety initiatives in place to achieve our target of Zero Harm.

### The client is our focus

We develop trusting and open relationships with our business partners and clients, ensuring we meet their needs and exceed their expectations. By delivering extraordinary results, we build their business and our own.

### Our people are our strength

We value our people's ability, diversity, and creativity, and do all in our power to nurture their existing talents and develop new ones. The way we care for, grow and encourage our people is a key part of our culture, and is governed by our People Practices.



### Respect the community and environment

Wherever we operate, we respect the diverse communities and environments and strive to achieve sustainable outcomes for all. Our footprint must engender a positive outlook for future generations, both abroad and at home.



### We seek ingenious solutions

We encourage our people to continually expand their knowledge and experience to become life-long learners. By constantly striving to find the best solution, we foster innovation.

### We are open, honest and collaborative

We respect the diversity and differences of our people, clients and the communities in which we live and work. We are straightforward and collaborative in all our communication.

## 3. Our Approach

### 3.1 Supply Chain Risks and Due Diligence

As part of Ausenco's vendor onboarding process, we continue to issue the Modern Slavery Questionnaire to vendors. This tool remains a key component in evaluating supply chain practices and identifying potential modern slavery risks.

We continue to work closely with our Vendor Team to capture and review vendor responses. By further integrating the Questionnaire into our Vendor Request Workflow (as implemented in our last reporting period), we've strengthened our ability to support the Vendor Team and the wider business, helping ensure vendors complete

the Questionnaire. We've also reinforced its importance across the organisation, highlighting its role in our efforts to address modern slavery risks in our annual global Business Ethics Training program.

In May 2024, we implemented the Questionnaire into the onboarding process for both new and existing vendors in our Canadian operations and we continue to collect responses from these vendors. This Statement includes key insights from the responses received across our Canadian and Australian operations.

The following are the key findings revealed by their responses:

- **Geographical Distribution:** Among the vendors who completed the Questionnaire, 32% were located in Australia and 46% in Canada—both countries generally considered to have lower modern slavery risks due to strong regulatory frameworks and enforcement mechanisms. However, the remaining 22% of vendors are distributed across a diverse range of countries, including the United States (8%), Turkey (4%), and several others such as China, Chile, South Africa, and Namibia (each 1%). Some of these regions, particularly those with less stringent labor laws or higher prevalence of informal labor markets, may present elevated risks of modern slavery. This geographical spread highlights the importance of conducting targeted due diligence and ongoing monitoring, especially for vendors operating in jurisdictions with known vulnerabilities to forced labor, human trafficking, or exploitative working conditions.
- **Service Composition:** The majority of vendors who responded to the Questionnaire provide professional services, with 26% offering engineering consulting, 9% environmental consulting, and smaller proportions delivering services such as surveying (2%), legal (1%), property (1%), translation and languages (1%), advertising (1%), financial (1%), events and marketing (2%), human resources and recruitment consulting (11%), and health and wellbeing (1%). These sectors generally present a lower inherent risk of modern slavery due to their reliance on skilled labor and regulated professional standards.

However, a subset of vendors operates in sectors with potentially higher exposure to modern slavery risks. These include equipment manufacturing (7%) and supply (7%), food and beverage services (2%), construction (1%), cleaning services (1%), and removalist and catering services (3%). These industries are often associated with low-wage, low-skill labor and may involve subcontracting or informal employment arrangements, which can increase vulnerability to exploitative practices. The presence of vendors in these higher-risk sectors underscores the need for enhanced due diligence, including supplier audits, contract clauses addressing modern slavery legislation compliance, and ongoing engagement to ensure compliance with ethical sourcing and labor practices.

- **Modern Slavery Policies and Procedures:** 50% of vendors reported having policies and processes to identify, investigate, and remedy instances of modern slavery, forced labour, and child labour and 65% confirmed the existence of a formal policy prohibiting such practices. Encouragingly, many vendors outlined robust responses to potential allegations, including internal investigations, escalation to senior leadership, reporting to authorities, and contract termination. A smaller group is in the process of implementing frameworks to manage these risks.
- **Employee Awareness:** Currently, 77% of vendors provide training on modern slavery risks, reflecting a growing awareness of the importance of educating staff on ethical labour practices. This figure is influenced by the nature of many businesses in the vendor pool, which include sole traders and small enterprises with limited personnel. Several vendors also indicated plans to implement training programs in the near future. Encouragingly, 98% of vendors have established mechanisms that allow employees to anonymously report concerns related to labour conditions and access appropriate remedies. These systems are a vital component of effective risk management and help foster a culture of transparency and accountability.
- **Supply Chain Due Diligence:** Supply chain due diligence practices are relatively strong, with 73% of vendors conducting assessments for modern slavery risks within their supply chains, and 65% requiring their suppliers to do the same. Additionally, 65% of vendors comply with key International Labour Organisation

(ILO) conventions, and 59% actively check for child labour within their operations and supply chains. These figures suggest a growing awareness and commitment to ethical sourcing, though there remains room for improvement in policy implementation and employee engagement.

In summary, most vendors are based in low-risk countries like Australia (32%) and Canada (46%), though 22% operate in higher-risk regions such as Turkey, China, and South Africa. This highlights the need for targeted due diligence in those areas. The majority of vendors provide professional services with lower modern slavery risk. However, a smaller group operates in higher-risk sectors like manufacturing, construction, and cleaning, which require closer monitoring due to their labour practices.

Half of the vendors have implemented processes to manage modern slavery risks, and 65% have formal policies in place. While many demonstrate strong incident response protocols, some are still developing their frameworks.

Employee awareness is improving, with 77% offering training and 98% providing anonymous reporting mechanisms. Supply chain oversight is also strong, with 73% conducting due diligence and 65% requiring their suppliers to do the same, though consistent implementation remains an area for growth.

These findings will inform Ausenco's efforts to strengthen supplier management and uphold responsible practices across its global supply chains. As more responses are received and the supplier risk evaluation expands internationally, a greater number of vendors will be assessed. By recognising the varying risk levels across industries and product categories, Ausenco can better prioritise engagement with higher-risk vendors and continue advancing its commitment to ethical sourcing.

## 3.2 Remediation

### Workplace Relations

As a global company, Ausenco values the diversity of its workforce and recognises it as a source of strength and innovation. We are committed to fostering a workplace that is free from discrimination, where all individuals regardless of background can work together in a respectful and professional environment.

Maintaining a discrimination-free workplace is a shared responsibility across all levels of the organisation, including employees, contractors, and consultants. Discrimination in any form is taken seriously and will not be tolerated. To support our commitment to diversity and inclusion, we have several employee-led groups, including:

- **Pride@Ausenco** – Focused on empowering LGBTQ+ inclusion and celebrating diversity. The initiative promotes a culture where all employees feel respected, valued, and supported.
- **Women@Ausenco** – Provides networking and mentoring opportunities to support the professional growth of women and raise their visibility within the organisation.
- **D&I Committee** – Champions initiatives that promote equity, inclusion, and belonging across the business.

Our Diversity and Inclusion Policy outlines how we promote diversity in areas such as education, skills, religion, ethnicity, language, gender, sexual orientation, disability, and age. Complementing this, our Fair Treatment Policy ensures a workplace free from bullying, discrimination, and harassment.

We also have clear remediation processes in place to address concerns related to labour practices or workplace grievances. Personnel can raise issues with their line manager, the People & Performance team, management, or through our Anonymous Whistleblower Alertline.

All procedures are clearly documented, shared with new employees, and accessible through our internal systems. These processes help ensure that concerns are addressed promptly and fairly, supporting a respectful and inclusive work environment for all.

## Dispute Resolution

Ausenco's standard contracts include dispute resolution provisions that allow suppliers to raise concerns and escalate issues to our personnel and management. These contracts also require suppliers to comply with our Modern Slavery Policy and all relevant laws. Failure to comply may result in termination of the agreement.

In 2024, we introduced further amendments to our standard contracts in our Canadian operations to align with the Canadian Supply Chains Act. These updates apply to both new and existing subconsultants and independent contractors, who typically provide project-specific or ongoing services. Ausenco's standard subconsultant and independent contractor agreements include clauses to ensure:

- Supplier personnel must not engage in any form of modern slavery;
- Suppliers must comply with all applicable laws, including modern slavery legislation (Canadian Supply Chains Act and the Australian *Modern Slavery Act 2018* (Cth) and Ausenco's Modern Slavery Policy;
- Where applicable, suppliers must implement relevant policies, procedures, and training;
- Suppliers must ensure similar protections are in place within their own supply chains;
- Suppliers must cooperate with Ausenco in investigating any suspected breaches of the relevant modern slavery legislation;
- Ausenco reserves the right to terminate agreements if a supplier fails to comply with the Policy or is found in violation of the relevant modern slavery legislation.

These measures strengthen our ability to manage modern slavery risks and reinforce our commitment to ethical and responsible sourcing.

## Ausenco's Whistleblower Protection Policy and Alertline

Ausenco's Whistleblower Protection Policy and Whistleblower Alertline is easily accessible to all personnel, subcontractors, and consultants via our website and internal document management system. As part of our ongoing commitment to ethical conduct, this policy is also a key component of our annual global Business Ethics training, which is currently being delivered across the organisation.

Our annual Business Ethics training includes comprehensive guidance on Ausenco's Whistleblower Protection Policy and clear instructions on how to use the "Alertline", our confidential reporting channel. This ensures that all personnel are informed of their rights and understand how to raise concerns appropriately.

To support anonymous reporting, the Alertline is accessible globally to all personnel. It provides a secure and confidential way to report (online or over the phone) any breaches of company policies, including potential modern slavery risks within our operations or supply chains.

The key objectives of Ausenco's Whistleblower Protection Policy are to:

- Promote ethical conduct and help prevent wrongdoing across the organisation;
- Outline the legal protections available under Australia's statutory whistleblower regime for individuals reporting actual or suspected misconduct;
- Provide clear procedures for handling and investigating disclosures made by whistleblowers.

We strongly encourage individuals to report any concerns. To date, no instances of modern slavery have been reported through the Alertline or to management. We remain committed to fostering a transparent, accountable, and safe environment where everyone feels empowered to speak up without fear of retaliation.

## 3.2.1 Employee Awareness

At Ausenco, we prioritise educating our employees about modern slavery and its potential presence within our supply chains. Our global annual Business Ethics training, delivered both in person and virtually, ensures broad participation across the organisation.

The global training program, which began in May 2025, is expected to conclude by the end of 2025. This mandatory training provides all personnel with an overview of our legislative obligations under modern slavery laws in Canada and Australia. It also educates employees on the nature of modern slavery, how to identify potential risks in supply chains, and the appropriate procedures for escalating and reporting concerns—particularly through our Anonymous Whistleblower Alertline.

During this reporting period:

- In the APAC Africa region, 402 personnel participated in training sessions.
- In South America (and Mexico), 814 personnel participated in training sessions.
- In North America, 42 personnel participated in training sessions with more sessions to come.

Training will continue globally throughout the year, with recorded sessions made available to personnel who were unable to attend live sessions. By delivering these initiatives and ensuring our personnel have access to essential resources, we aim to equip our people with the knowledge and tools needed to identify and respond to modern slavery risks across our operations and supply chains.

## 4. Looking ahead

To strengthen our response, we will be implementing the following initiatives:

- Aligning procurement and vendor registration processes across regions and business lines to ensure consistency and transparency.
- Reviewing and refining our Vendor Onboarding processes, policies, and project documentation to better integrate modern slavery risk considerations.
- Conducting supply chain risk assessments using Modern Slavery Questionnaires across multiple jurisdictions.
- Continuing supplier risk assessments and due diligence to deepen our understanding of modern slavery risks and enhance mitigation strategies.
- Ongoing employee awareness initiatives, including the continuation of our annual global Business Ethics training.

These actions reflect our ongoing efforts to improve how we manage modern slavery risks and support ethical practices across our operations and supply chains.



## Appendix 1

Ausenco Entity	Location
Vector Argentina SA	Argentina
Ausenco Management Pty Ltd	Australia
Ausenco Operations Pty Ltd	Australia
Ausenco Services Pty Ltd	Australia
Ausenco Rylson Pty Ltd	Australia
Ausenco Projects Australia Pty Ltd	Australia
Ausenco Rylson Asset Optimisation Pty Ltd	Australia
Ausenco International Pty Ltd	Australia (Mexico branch)
Ausenco do Brasil Engenharia Ltda.	Brazil
Ausenco Engineering Canada ULC	Canada
Ausenco Sustainability ULC	Canada
Ausenco Chile Limitada	Chile
Ausenco Peru S.R.L	Peru
Ausenco Engineering USA South Inc	USA
Ausenco PSI LLC	USA
Ausenco Mexico S. De R.L. De C.V	Mexico

## MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

### Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of Ausenco Pty Ltd as defined by the *Modern Slavery Act 2018 (Cth)*<sup>1</sup> ("the Act") on 24 June 2025.

### Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of Ausenco's Audit and Risk Committee as defined by the Act<sup>2</sup>:



**Rod Baxter**  
Non-executive Director and Chair of the Ausenco Audit and Risk Committee

### Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	2, 10
b) Describe the reporting entity's structure, operations and supply chains.	2,3,10
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	5,6
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	5,6
e) Describe how the reporting entity assesses the effectiveness of these actions.	5,6
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement). *	3, 10
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	

\* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

\*\* You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

- Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.
- Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001*—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.



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