



Modern Slavery Act (2018) Compliance Report December 2022

FAU-25687

Issue	Rev	Date	Prepared By	Reviewed By	Approved By Owner
Issued For Use	0	14 June 2023	Richard Griffin	Richard Griffin	Simon Clode

RJ Griffin *RJ Griffin* *Simon Clode*
RJ Griffin (Jun 14, 2023 14:05 GMT+8) RJ Griffin (Jun 14, 2023 14:05 GMT+8)

Contents

1.	Introduction	1
2.	Identifying and Describing the Reporting Entity (Reporting Criteria 1 & 2)	2
2.1	Our Business	3
2.2	Our Suppliers	4
3.	Describing the Risks of Modern Slavery Practices (Reporting Criterion 3)	6
3.1	Our Operations	6
3.2	Our Suppliers	7
3.3	Looking Forward	9
4.	Actions taken by the Reporting Entity (Reporting Criterion 4)	10
4.1	Our Policies	10
4.2	Suppliers and Partners	10
4.3	Suppliers and Partners: Vessels	11
4.4	Training	11
4.5	Looking Forward	12
5.	Assess the Effectiveness of Actions Taken (Reporting Criterion 5)	13
6.	The Process of Consultation (Reporting Criterion 6)	14
7.	Any Other Relevant Information (Reporting Criterion 7)	15
7.1	About Fugro	15
7.2	Our Purpose	15
7.3	Our Values	16

Figures in the Main Text

Figure 2.1: Fugro Australia company entities structure	2
--	---

Tables in the Main Text

Table 3.1: Fugro Australia Tier 1 Suppliers – Risk Assessment by Country of Operation	7
Table 3.2: Fugro Australia Tier 1 Suppliers – Volume of Purchases by Country of Operation	8
Table 3.3: Fugro Australia Tier 1 Suppliers – Risk Assessment by Product / Service Category	8
Table 3.4: Fugro Australia Tier 1 Suppliers – Volume of Purchases by Product / Service Category	9

1. Introduction

Fugro Holdings (Australia) Pty Ltd and its subsidiaries (Fugro Australia) recognises and subscribes to the principle that freedom from slavery is a fundamental human right. We are committed to the UN Guiding Principles on Business and Human Rights, which state that entities have a responsibility to respect human rights in their operations and supply chains. This commitment includes taking action to prevent, mitigate and, where appropriate, remedy Modern Slavery in our operations and supply chains.

Part of the intention of the Modern Slavery Act 2018 is, we believe, to help organisations like Fugro Australia engage with the topic, and provide a framework for the ongoing development and improvement of our capacity to prevent, mitigate and remedy Modern Slavery.

Today, we understand and are actively mitigating the potential for our business and our operations to be linked to Modern Slavery, particularly through our supply chains but also in our own practices and undertakings which are outsourced.

We have begun our journey in determining our role in understanding and ultimately helping to eliminate Modern Slavery, and we are developing the tools required to:

- identify our impacts both positive and negative.
- engage with our personnel, our suppliers and, in some cases their suppliers, to detect instances and acts of Modern Slavery in our relationships.
- and to develop strategies and actions to deal with what we find.

This Statement has been prepared under the 'Guidance for Reporting Entities' provided by the Commonwealth Government and submitted to the Australian Border Force for publication pursuant to Section 16 (1) of the Modern Slavery Act.

The Statement was approved by the board of Fugro Holdings (Australia) Pty Ltd as the primary reporting entity and proprietor of the named reporting entities covered in the report, on 23 August 2022.



Simon Clode
Director Pacific
Fugro

2. Identifying and Describing the Reporting Entity (Reporting Criteria 1 & 2)

Identifying and Describing the Reporting Entity

Fugro Holdings (Australia) Pty Ltd is a wholly owned subsidiary of Fugro N.V. (Fugro) a globally active Geo-data specialist employing 9,500 people in 61 countries. Fugro originated and is headquartered in the Netherlands, the only country in the world to be awarded an 'A' rating for government response to Modern Slavery¹.

Fugro Australia operates primarily in Australia, New Zealand and Pacific Islands. The company operates a number of wholly owned subsidiaries, as shown in Figure 2.1 below, which includes ACN numbers for the relevant entities.

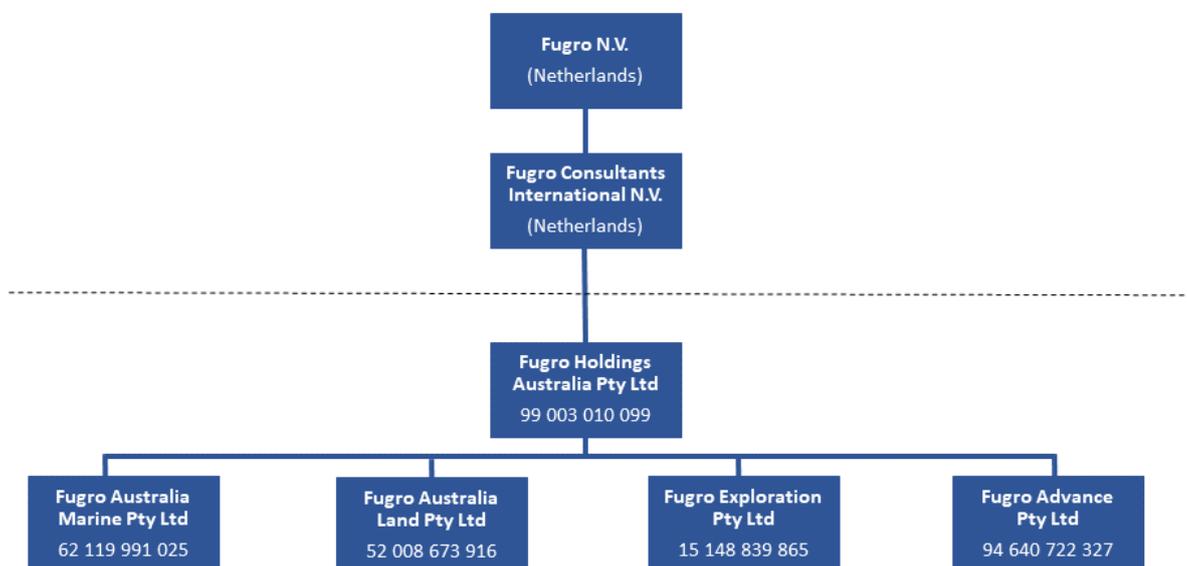


Figure 2.1: Fugro Australia company entities structure

During the reporting period, Fugro Australia included several other subsidiaries not shown in the organisation chart above. Fugro Australia is currently actively reducing the number of legal entities in operation. As with the subsidiary companies shown above, all the inactive subsidiaries are under the same leadership as Fugro Australia, with the same Directors and management. This ensures that all subsidiaries are operated according to the Fugro Values:

- We do what's right.
- We respect and include others.
- We stand firm and do the right thing.
- We speak up if situations aren't right or safe.

¹ Global Slavery Index 2018 – Table 1 (p45).

All current subsidiaries of Fugro Australia provide operational or administrative support in the delivery and provision of expertise and resources to our clients. Our services are categorised in four Business Lines, namely:

- Marine Asset Integrity (MAI).
- Marine Site Characterisation (MSC).
- Land Asset Integrity (LAI).
- Land Site Characterisation (LSC).

This portfolio of services allows Fugro Australia to deliver effectively into a variety of markets including Oil and Gas, Mining, Infrastructure and Defence.

Fugro Exploration specialises in delivering Geo-data services to the exploration sector, particularly in oil and gas, and Fugro Australia Marine operates the vessels, crews and onshore infrastructure that facilitate those services.

For the purposes of this document, Fugro Australia includes the primary holding company and all subsidiaries, as all operate under the same management and leadership, and share administrative and operational personnel.

2.1 Our Business

Fugro Australia is part of the international Fugro group, the world's leading Geo-data specialist. In Australia and the Pacific region, Fugro Australia employs approximately 520 people focused on collecting and analysing comprehensive information about the Earth and the structures built upon it. Through integrated data acquisition, analysis and advice, we unlock insights from Geo-data to help our clients design, build and operate their assets in a safe, sustainable and efficient manner.

Fugro Australia's operations areas cover Australia, New Zealand and the Pacific Islands, and as a market leader in survey and geotechnics we are respected for our unique combination of solutions that enhance the safety and efficiency of onshore and offshore oil and gas developments. We are also noted for our geospatial solutions, particularly 3D mapping and asset management services.

Fugro Australia operates several integrated offices and facilities across Australia:

- Perth / West Perth WA.
- Osborne Park WA.
- Balcatta WA.
- Adelaide SA.
- Brisbane Qld.

In many cases our clients are large multinational corporations, as well as organisations such as the United Nations and Australian government entities which not only have well-developed Modern Slavery practices and approaches, they also demand high levels of responsiveness to the issue.

As noted above, Fugro Australia is an integrated business that shares common leadership and management, which ensures consistency in awareness of and responses to the issue of Modern Slavery.

Further information regarding Fugro's business activities and outcomes are available on request.

2.2 Our Suppliers

Working in the field of Geo-data, Fugro Australia personnel operate in environments of every kind within Australia, New Zealand and the Pacific Islands. We use technology to collect data relating to geography, geology, topography, bathymetry, built environments and structures (interior and exterior). We collate and analyse the data collected to provide advice to help our clients make decisions pertaining to the development and ongoing management of their assets.

Our suppliers include those involved in the provision of the technical equipment we use, as well as business equipment ranging from IT and communications, to vehicles, vessels, drones and UAVs/USVs. Additionally, goods and services related to our facilities, administration, and corporate responsibilities such as travel, PPE and apparel are also acquired.

For the purposes of this document, we have compiled a list of Tier 1 suppliers, with whom our annual spend is \$500,000 or more, showing our informal risk profile. The table is shown in Section 3 (reporting Criterion 3) below. The majority of suppliers in this category are Australian based and operating in the specialised services sector, and as such we assess the risk of Modern Slavery in these companies as low. Purchasing locally wherever possible is a Fugro Australia policy and commitment, and as the table demonstrates, the great majority of our purchasing is conducted in the local economies in which we work. Some products we purchase are included on the Global Slavery Index high risk category:

- Clothing and apparel.
- PPE.
- Computers and laptops.
- Telephones.
- Labour hire.
- Security services.
- Logistics (transport and marine).
- Catering and hospitality.
- Building, construction and fabrication.

For those items at high risk that we are compelled to purchase overseas, we generally have established relationships with reliable and reputable suppliers. In cases where we change suppliers or are required to make ad hoc purchases, we conduct due diligence before commencing a new relationship. Consistent internal and external auditing of all supplier relationships, including risk assessment, ensures that we remain well-informed of our regular suppliers' practices and approaches.

3. Describing the Risks of Modern Slavery Practices (Reporting Criterion 3)

Describing the Risks of Modern Slavery Practices in the Operations and Supply Chains of the Reporting Entity and any Entities the reporting Entity Controls or Owns

Understanding the risks of Modern Slavery practices in our operations and supply chains is a complex and demanding task. Since the previous reporting period Fugro Australia has undertaken a formal supply chain assessment to identify opportunities and to mitigate risk across the company's supply chain, particularly to identify any risks that our actions may cause, contribute to or be directly linked with Modern Slavery.

In simple terms, as an ethical company operating in an area of the world that is ranked very highly in terms of response to Modern Slavery, political rights, and civil liberties², we had previously functioned under the belief that because our operations are almost certainly free of Modern Slavery or labour exploitation, we were sufficiently engaged with the topic. However, in the pursuit of full engagement with the issue of Modern Slavery Fugro Australia has decided on being proactive in identifying any risk within the supply chain and taking appropriate steps in mitigating that risk.

As stated in the introduction, we believe that the purpose of the Act is to help raise awareness of the issues surrounding Modern Slavery, and to help us develop the strategies and tools to deal with it.

We anticipate that in the next reporting period Fugro Australia will demonstrate further progress in this area, and one of the priorities will be to conduct increased formal assessment of the risks of Modern Slavery practices across our operations and business relationships.

In order to comply with the mandated reporting, in this section we provide an analysis prepared utilising the *Commonwealth Modern Slavery Act – Guidance for Reporting Entities*, and the *Global Slavery Index 2018*.

3.1 Our Operations

Fugro Australia provides technical services to a wide range of clients in Australia, New Zealand and the Pacific Islands. We deploy highly qualified personnel to various land-based and offshore facilities to conduct asset integrity and site characterisation related services.

As such, we consider that there is minimal potential for our operations to cause or contribute to Modern Slavery. However, we are aware that areas of vulnerability may exist in services we outsource, including vessel hire and crewing, transport and logistics, security, catering and hospitality, cleaning and facilities management, the purchasing of PPE and apparel, and in cases where local labour is hired to assist in operations.

² Global Freedom Scores as defined and ranked by Freedom House. <https://freedomhouse.org/countries/freedom-world/scores>.

Given that we award contracts for most of these goods and services based on tenders and quotations that include due diligence of the vendors and suppliers, we assess that the risk of our operations causing or contributing to Modern Slavery across these categories is low.

3.2 Our Suppliers

The tables below provide insight into the types of goods and services and countries of operation of Fugro Australia’s Tier 1 suppliers, and our assessment of the risks of their activities causing or contributing to Modern Slavery. Please note that of the products deemed to be in the high-risk category on the Global Slavery Index, Fugro Australia’s Tier 1 suppliers include only those involved in transport and logistics labour hire.

As noted above, this assessment is based on information found in *Commonwealth Modern Slavery Act – Guidance for Reporting Entities*, and the *Global Slavery Index 2018*. In future reporting periods, we will expand the assessment information to include the complete company supply chain and will have commenced formal supplier engagement including Supply Chain Assessment Questionnaires to ensure compliance.

Table 3.1: Fugro Australia Tier 1 Suppliers – Risk Assessment by Country of Operation

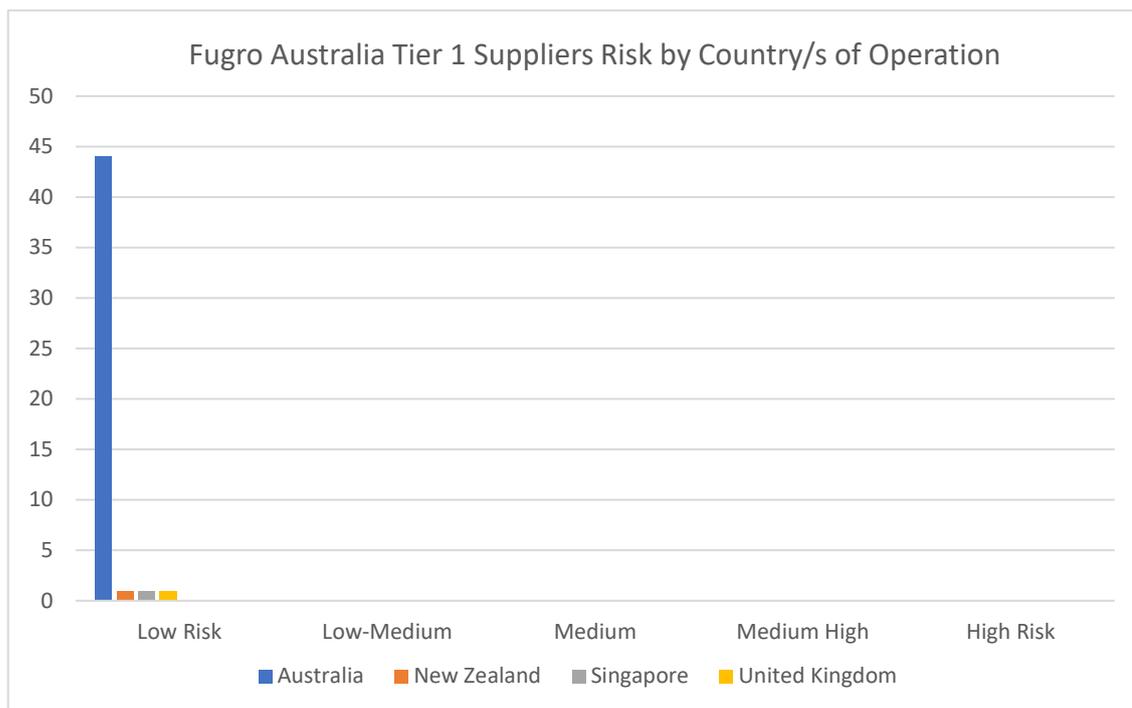


Table 3.2: Fugro Australia Tier 1 Suppliers – Volume of Purchases by Country of Operation

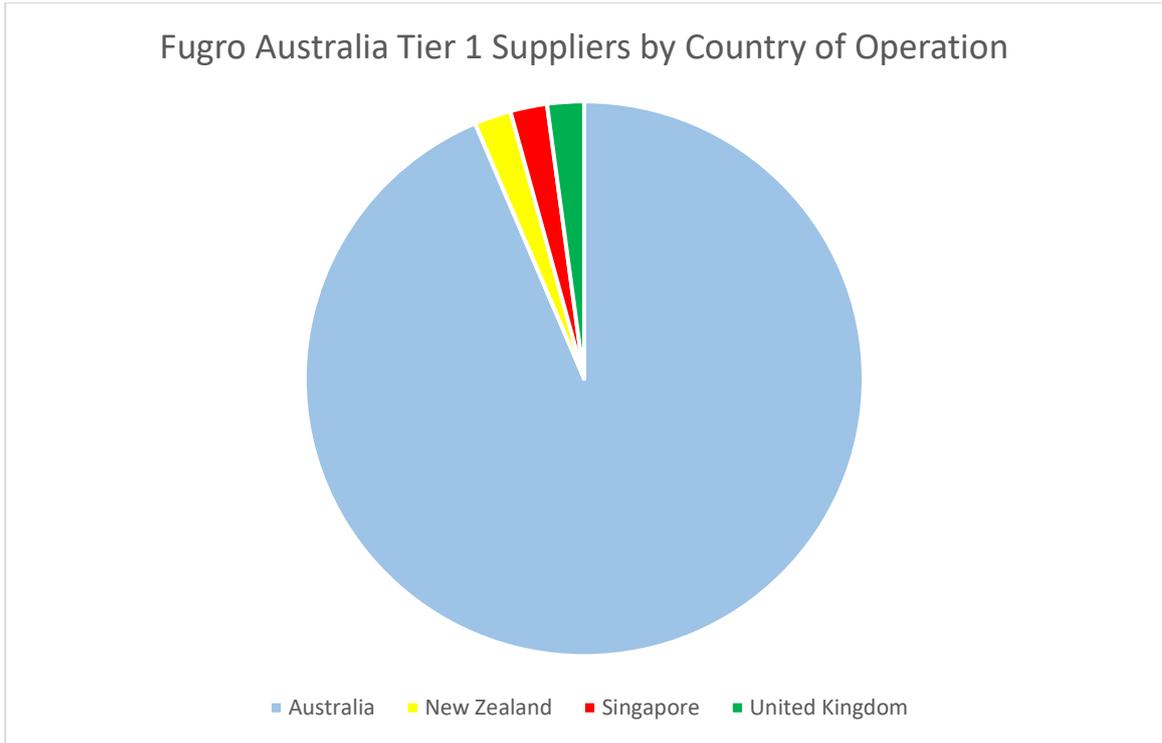


Table 3.3: Fugro Australia Tier 1 Suppliers – Risk Assessment by Product / Service Category

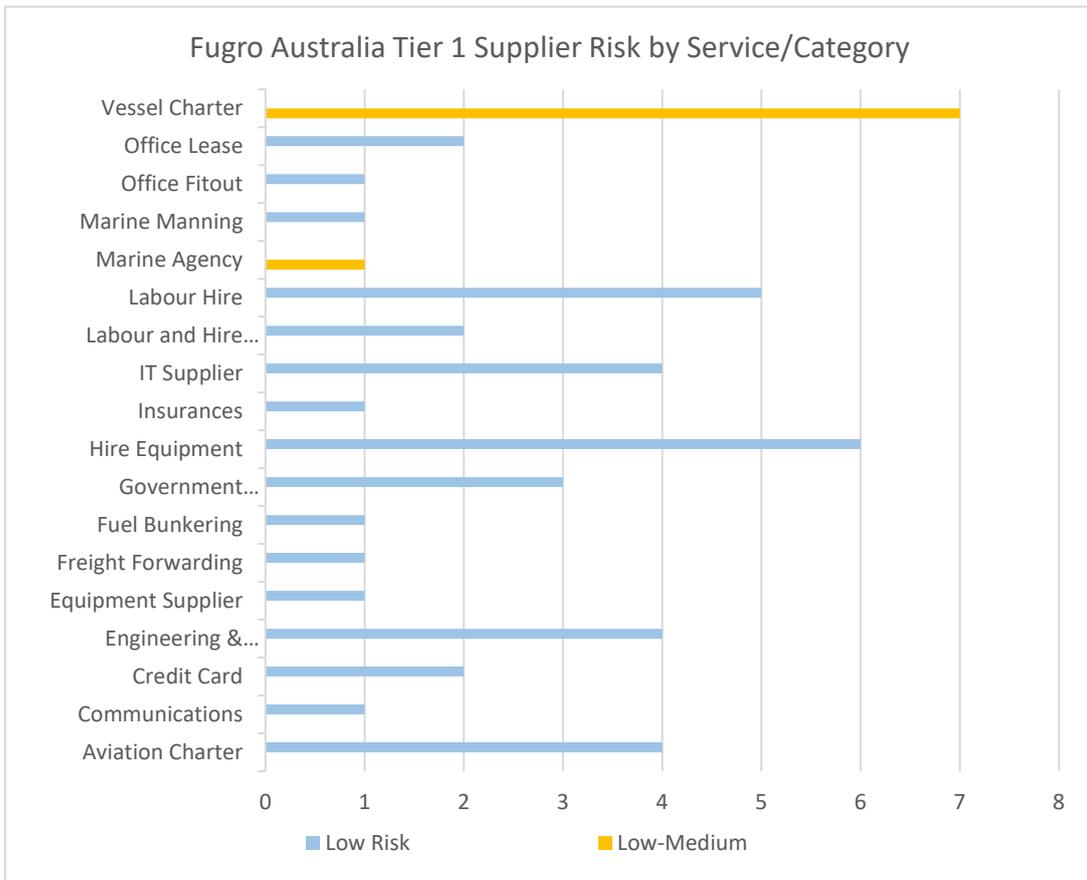
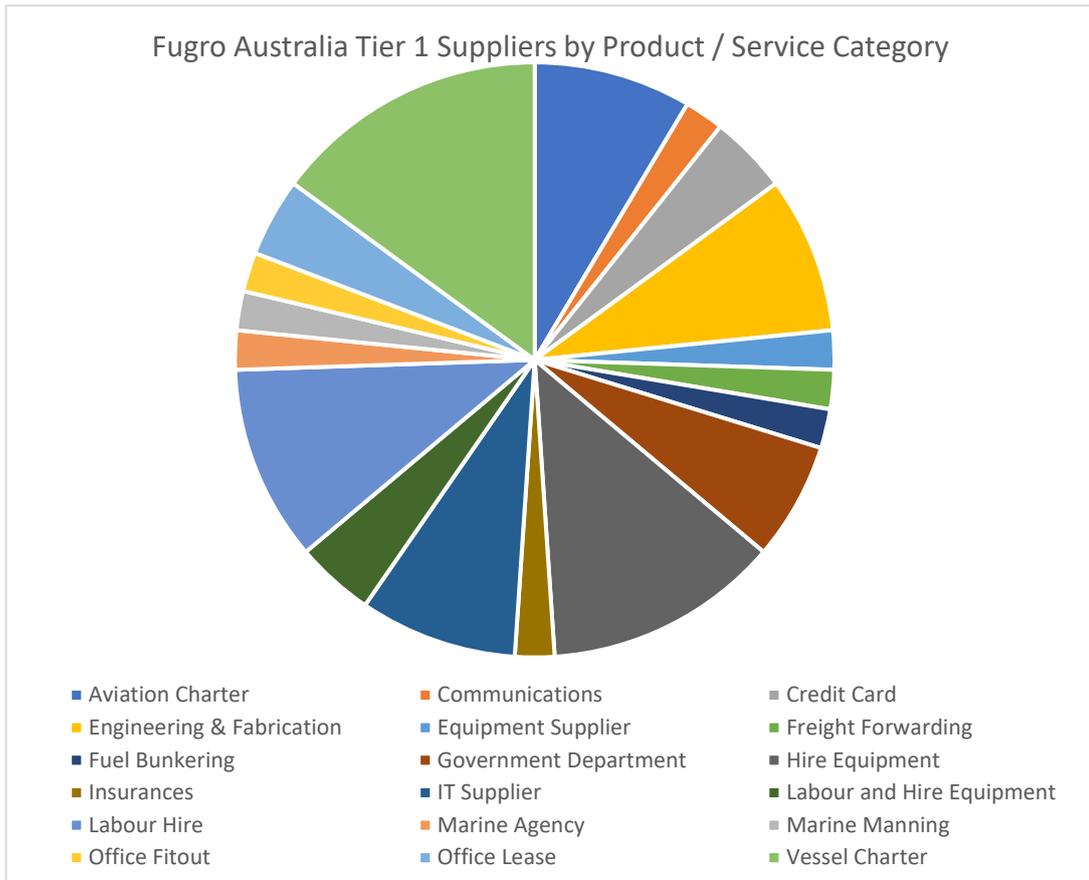


Table 3.4: Fugro Australia Tier 1 Suppliers – Volume of Purchases by Product / Service Category



3.3 Looking Forward

Participation in the provisions of the Act has provided the Fugro Australia team a positive framework for actions that have been taken to assess and control the risk of our operations or purchases causing, contributing to, or linking us to Modern Slavery. Further progress will be made in the next reporting period in implementing policies and actions that will assist in assessing the risks associated with our activities and business relationships, including:

- Establishing a Working Group on Modern Slavery.
- Implementation of a formal risk assessment structure and updating our risk assessments.
- Implementing traceability processes to enhance our understanding of the sources of products and the raw materials used in them.
- Working with peer companies in our sector to share information and findings, and possibly collaborate on risk assessments of high-risk parts of the supply chain.

4. Actions taken by the Reporting Entity (Reporting Criterion 4)

Describe the Actions taken by the Reporting Entity and any Entities that the Reporting Entity Owns or Controls to Assess and Address these Risks, including Due Diligence and Remediation Processes

In line with our Group's values and principles, we are committed to acting ethically and with integrity in our business relationships. We seek to establish and adhere to clear ethical standards for ourselves and foster similar standards in third parties who work with us or on our behalf.

We have zero tolerance of slavery and human trafficking in all their different forms and are committed to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere within our business or supply chain.

4.1 Our Policies

Respect for human rights is embedded in Fugro's values and in the Fugro Code of Conduct. Fugro's Policy on Human Rights explicitly forbids any form of slave, forced, bonded, indentured, or prison labour. Fugro's values, Code of Conduct and Policy on Human Rights apply equally to the actions of Fugro companies and to our conduct as individuals. Remuneration for employees and temporary workers is consistent with the provisions of applicable wage laws, collective bargaining agreements and ILO standards. Where relevant, international maritime standards are upheld (e.g. Maritime Labour Convention standards).

Our global Speak Up Procedure enables Fugro employees, temporary workers, contractors, and other business partners, such as suppliers and customers, to raise concerns and report instances of potential non-compliance in complete confidence. Anyone using the Speak Up Procedure is guaranteed protection against retaliation.

Information on our Code of Conduct, related policies and Speak Up Procedure is provided to employees globally and published on our company intranet.

4.2 Suppliers and Partners

Fugro seeks to work with suppliers and other business partners who contribute to sustainable development and are environmentally and socially responsible. Pre-qualification procedures, such as supplier questionnaires, are part of our supply chain compliance program. Where applicable, these include questions on the supplier's controls regarding the human trafficking and slavery laws.

Fugro maintains a Supplier and Partner Code of Business Principles (Supplier and Partner Code). This obliges suppliers and partners to comply with all applicable laws and regulations, including inter alia those regarding slavery and human trafficking, to treat workers fairly, to provide a safe and healthy work environment and to eliminate all forced, compulsory and child labour.

Fugro can audit compliance with the Supplier and Partner Code; failure to adhere to it may lead to immediate termination of the business relationship with the supplier or the introduction of compulsory improvement plans.

We work with our suppliers of materials at global and country level to include the Supplier and Partner Code in our contracts with them. Specific actions taken in the reporting period notably include the completion and return of a Critical Supplier Pre-qualification Questionnaire, which requires the following:

- Details of the countries and regions in which the supplier operates.
- Reporting of past, current, pending or threatened investigation or prosecution for bribery and other corruption.
- Copies of the respondent's Approved Supplier List and Supplier Management Procedure.
- Sharing of supplier records including audit reports, site visits and statistics.
- Information regarding materials traceability and identification across areas such as fabrication, rigging, consumables, equipment hiring, and services hiring.

In addition, our Supplier Account Set-up invites suppliers to act as a Partner in our Code of Business Principles and if the supplier refuses, asks for reasons for the refusal.

During the reporting period, Fugro Australia engaged with several major stakeholders regarding Modern Slavery, activities included:

- Visiting and auditing several maritime and logistics suppliers.
- Requesting some clients complete a questionnaire related to Modern Slavery.
- Signing client contracts which included a section and clauses related to Modern Slavery.

4.3 Suppliers and Partners: Vessels

While a substantial proportion of crew working on Fugro vessels is employed directly by Fugro, we also work with crewing agents. We are aware that this entails higher risks to labour rights and in 2020 continued to implement control mechanisms to reduce these risks. In addition to gradually reducing the number of agents, such control mechanisms include an increased focus on human slavery risks in the selection and contracting process, audits and checks with seafaring crew.

4.4 Training

A worldwide mandatory Code of Conduct training program is in place to ensure awareness throughout Fugro of the need to act with integrity and do business responsibly.

4.5 Looking Forward

In the next reporting period, we expect to have made further progress in implementing policies and actions that will assist in addressing the risks associated with our activities and business relationships, including:

- Reviewing and where necessary updating due diligence, for example including a requirement for statements and policies specifically related to Modern Slavery in Requests for Tender (RFTs) and Requests for Quotations (RFQs).
- Engaging more with suppliers on the issue and potentially intensifying screening and qualification procedures, including the development and use of a Supplier Modern Slavery Questionnaire.
- Developing a clear method for identifying, assessing, and classifying actual and potential human rights risks.
- Reviewing Fugro's Speak Up program to determine whether it sufficiently covers the issue of Modern Slavery, and recommending changes that make it more effective in this area.
- If necessary, creating a separate remediation process related strictly to Modern Slavery.

5. Assess the Effectiveness of Actions Taken (Reporting Criterion 5)

Describe How the Reporting Entity assesses the Effectiveness of Actions being taken to Assess and Address Modern Slavery Risks

Fugro Australia undertakes regular internal and external auditing of its practices and business relationships to assess adherence to our policies and regulatory compliance requirements.

Given the company's renewed awareness of the issue through compliance with the Act, a plan is being formulated to introduce more robust effectiveness assessment measures, including:

- Mandating that the Working Group on Modern Slavery regularly review the actions taken to assess risks, identify instances and incidents involving Modern Slavery, and the remediation processes developed.
- Engaging with suppliers to review their risks and responses to Modern Slavery and entering into dialogue to determine the effectiveness of our action's vis a vis their responses to Modern Slavery.
- Putting in place measures to track awareness of and compliance with our actions in the Modern Slavery space, including assessing the effectiveness of internal education and training.
- Reviewing and, if necessary, updating training programs, or creating training and education modules specific to Modern Slavery.

No incidents or practices that could be described as causing Modern Slavery have ever been reported in any Fugro Australia operations, and while we are aware of the risks of contributing to or being linked to Modern Slavery practices through our supply chain, we are not aware of any such incidences for the reporting period.

Reviewing the Speak Up program to determine whether any complaints or grievances related to Modern Slavery reveals that no such complaints or grievances were made during the reporting period.

6. The Process of Consultation (Reporting Criterion 6)

Describe the Process of Consultation with any entities the Reporting Entity Owns or Controls

As stated in Criterion 1/2, Fugro Australia operates several subsidiary companies – in all cases the same Directors provide leadership, and the management of these companies is undertaken by the Fugro Australia management team. As these entities all operate under the same direction and governance, and all have committed to abide by the Purpose and Values articulated by Fugro N.V. (see Criterion 7 below), for the purposes of this document Fugro Australia encompasses all entities.

7. Any Other Relevant Information (Reporting Criterion 7)

Any Other Relevant Information

7.1 About Fugro

Fugro N.V., the parent company and 100% proprietor of Fugro Australia, was established in 1962 by Kees Joustra, a pioneer of the cone penetrometer test (CPT), a revolutionary geotechnical soil testing technique. Joustra created a niche for the company by successfully combining the practice of soil analysis with the theory of advice on foundation design and set Fugro on a path of growth and success.

Today, as the global leader in site characterisation and asset integrity, Fugro offers integrated services anywhere in the world, employing some 9,500 people in 61 countries. Delivering complex, high-profile projects, the company dominates specific market segments in selected countries and regions.

7.2 Our Purpose

Our planet is extremely complex and continuously changing. Understanding this complexity is essential in order to build and maintain assets in a responsible manner. Fugro's expertise is essential to create a safe and liveable world.

We are living in a period of intense and accelerating change. Over the coming decades, population growth, increasing wealth and urbanisation will lead to an increasing demand for energy, water, food, minerals, metals, buildings, industrial plants and infrastructure. At the same time, technology is changing faster than ever before, affecting virtually every industry and opening up new opportunities for different, more effective ways of working.

These global trends also lead to massive challenges for the world, most notably climate change. Therefore, the future cannot just be about more; it also must be about better. The energy mix, infrastructure and built environments must evolve if tomorrow's problems are to be tackled successfully.

Through our integrated and digital solutions, we support clients in dealing with the challenges of today and tomorrow. Fugro provides the essential data, analysis and advice that our clients rely on to realise and operate their construction projects and infrastructure more safely, sustainably and efficiently. We sometimes play a small role in a client's project, but it is always critical.

7.3 Our Values

Our values guide us in fulfilling our purpose as an organisation: together we create a safe and liveable world. While each value has a distinct role to play, they are linked and equally important. We live by our values and their sum is our collective strength as a company.

Our values represent what we stand for:

We are determined to deliver:

- We make sure we understand what is needed.
- We deliver by working together, enthusiastically.
- We keep everybody informed on our progress.

Our customers know that they can rely on us to provide meaningful solutions to their challenges. We get the best out of ourselves to deliver constant Fugro quality to all our stakeholders. The strong connections within Fugro, our team orientation and determination help us succeed.

We build trust:

- Trust begins by giving trust.
- We act with candour and courage.
- We help others succeed.

Trust is at the heart of our lives, whether at home or at work. We trust each other at Fugro, as it is what holds us together. Without trust, transparency, and honesty we will never be able to find lasting success. Trust is earned by actions, not words. Our clients and other stakeholders recognise us as a trusted partner. Our personal success lies in being comfortable to ask for help when needed.

We prepare for tomorrow:

- We believe our future success starts with doing our best work today.
- We learn from today to prepare ourselves for the future.
- We embrace change as it brings opportunity.

The world around us is changing fast and we constantly adapt to these changes. We want to contribute to a bright future for the world we live and work in. We believe challenges are here to be addressed. Things that worked fine until today, might need improvement tomorrow. We learn from situations where something went wrong. Tomorrow starts today: share ideas, ask for feedback and act now to help build a stronger Fugro.

We do what's right:

- We always respect and include others.
- We stand firm and do the right thing.
- We speak up if situations aren't right or safe.

Doing what's right is crucial to us. We demonstrate courage in doing the right thing and together create a healthy and productive working environment. We always do what's right for Fugro, for our clients, for ourselves and everyone and everything around us. Above all, we respect others regardless of who they are.

Fugro Holdings Modern Slavery Statement December 2022 (FAU-25687) Rev 0

Final Audit Report

2023-06-14

Created:	2023-06-14
By:	Giorgina Lamattina (G.Lamattina@fugro.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAU2it7JPOTqAM4JSRuRa9vhqvy_gezi3y

"Fugro Holdings Modern Slavery Statement December 2022 (FAU-25687) Rev 0" History

-  Document created by Giorgina Lamattina (G.Lamattina@fugro.com)
2023-06-14 - 5:36:31 AM GMT- IP address: 165.225.226.189
-  Document emailed to Richard Griffin (r.griffin@fugro.com) for signature
2023-06-14 - 5:37:13 AM GMT
-  Email viewed by Richard Griffin (r.griffin@fugro.com)
2023-06-14 - 6:04:27 AM GMT- IP address: 104.47.57.254
-  Signer Richard Griffin (r.griffin@fugro.com) entered name at signing as RJ Griffin
2023-06-14 - 6:05:02 AM GMT- IP address: 165.225.226.193
-  Document e-signed by RJ Griffin (r.griffin@fugro.com)
Signature Date: 2023-06-14 - 6:05:04 AM GMT - Time Source: server- IP address: 165.225.226.193
-  Document emailed to s.clode@fugro.com for signature
2023-06-14 - 6:05:06 AM GMT
-  Email viewed by s.clode@fugro.com
2023-06-14 - 6:27:45 AM GMT- IP address: 104.47.58.254
-  Signer s.clode@fugro.com entered name at signing as Simon Clode
2023-06-14 - 6:28:16 AM GMT- IP address: 165.225.226.180
-  Document e-signed by Simon Clode (s.clode@fugro.com)
Signature Date: 2023-06-14 - 6:28:18 AM GMT - Time Source: server- IP address: 165.225.226.180
-  Agreement completed.
2023-06-14 - 6:28:18 AM GMT