



ALTUS GROUP

Modern Slavery Statement

2023/24 Financial Year
Altus Group Holdings Pty Ltd

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Introduction

Altus Group Holdings Pty Ltd (**Altus Group**) submits this Modern Slavery Statement for the financial year ending 30 June 2024.

The Statement is issued in accordance with the *Modern Slavery Act 2018* (Cth) (**MS Act**) and sets out our commitment, actions and progress toward assessing and addressing modern slavery risks within and adjacent to **Altus** operations.

The statement provided encompasses all controlled entities of the **Altus Group**.

Commitment

Altus Group is a private company providing temporary traffic management and allied services throughout Australian and New Zealand.

Rapid growth has propelled the company through a range of employment and revenue thresholds that now require it to participate in a suite of formal governance reporting. These requirements have compelled a maturation of our approach to governance in general, together with an opportunity to formalise our previously intuitive commitment to issues otherwise captured within UN Sustainable Development Goals.

We are a people and safety focussed business with a venerable history of supporting the health, well-being and rights of our employees. Moreover, we have been proactive in the accomplishment of other key goals including sustainable business practices and making a positive impact on the communities our staff live and work in. Consequently, our approach to assessing and addressing the risks of modern slavery practices within our operations have come to form part of a larger and more holistic ambition for improving our legacy among all the people and places we are involved with.

Structure and Operations

Altus Group is the parent company of a number of controlled entities in Australia and New Zealand. We operate in all States and Territories of Australia (excluding the Northern Territory), as well as the North and South Islands of New Zealand.

The traffic management sector of the Group is primarily a serviced-based organisation delivering temporary traffic management services to customers in road, rail and building construction, road and rail maintenance, utilities construction and maintenance, event management, municipal, mining and engineering services. Services encompass the planning, permitting, supply and execution of temporary traffic management diversions, effectively facilitating customers to undertake their core business in public locations safely. Services are delivered through an assembly of resources including people, fleet, technological systems and traffic control devices. **Altus Group** additionally operates formally registered training organisations in both Australia and New Zealand, allowing for new and existing practitioners to receive the skills and qualifications necessary for working in the industry.

Altus Group employs more than 5,500 people across 65 locations with a further 80 staff providing administrative and training support for the business from the Philippines.

Supply Chains

As a primarily service-based organisation, the risk of **Altus Group** being *directly* exposed to modern slavery practices continues to be assessed as low. We do not engage in the production and sale of goods, nor do we directly source raw materials for input. Greater than 98% of the more than 750

members of the **Altus Group** supply chain are Australian or New Zealand based businesses where the risks of modern slavery are comparatively low in the context of global markets.

Supply chain categories may be broadly divided among Products and Services as follows:

Products	Services
<ul style="list-style-type: none">• Vehicle/fleet purchase and hire• Plant purchase and hire• Approved traffic devices purchase• Personal Protective Equipment purchase• Office equipment, furniture and consumables purchase• IT device purchase and hire• Property Leasing	<ul style="list-style-type: none">• Fleet Management Services• Labour Hire Services• Facilities maintenance services• Professional services• Telecommunication services• Business process outsourcing• Software subscription and purchasing

Relationships through our supply chain may be characterised primarily as deep and long-term, with **Altus Group** extending continued support to many of its major suppliers for more than a decade. The scope of supply will vary according to specialisation, service level and commercial arrangement and may be either regional, national or international. Notwithstanding the history of long-term, trusted supplier relationships, commercial arrangements governing the supply of goods and services have been relatively informal and contemporaneously transactional in nature. However, our methodology for assessing and reviewing modern slavery risks has seen an increasing formalisation in the policies and processes governing these relationships.

Identifying and Assessing Modern Slavery Risks

This is the fifth Modern Slavery Statement from **Altus Group** and, pursuant to the guidance for reporting entities under the MS Act, we have again assessed the potential of how our direct operations and our broader supply chain partnerships may be supporting modern slavery. The low likelihood of *direct* links to modern slavery have been re-affirmed during this most recent review and the organisation is continuing to refine its scrutiny of supply chain risks.

Causing Modern Slavery

An initial review of the sourcing activities of **Altus Group** demonstrates a *low risk* of *directly* contributing to modern slavery. We do not engage in the production of goods, do not directly source raw input materials, and do not operate at any material scale outside of Australia and New Zealand.

Recruitment and management of staff is governed by processes that are both articulated and formalised under a third-party certified business management system, and which are aligned to relevant industrial relations and immigration legislative frameworks. Staff recruitment and commencement activities ensure compliance with statutorily compelled age and foreign eligibility requirements. New employees are additionally inducted into **Altus Group** systems of policies, procedures and employment conditions.

Enterprise Agreements ratified by the Fair Work Commission and that satisfy the Better Off Overall Test (BOOT) against the applicable Modern Award exist in all Australian States of operation and govern the remuneration and conditions of field-based staff. Office based personnel are engaged under compliant Employee Service Agreements. A dedicated Staff Engagement function oversees processing

responsibilities for wages, superannuation and other entitlements, as well as facilitating potential payment queries for expedited resolution.

The use of external labour hire services is minimal, remaining a last resort for the temporary fulfillment of peak and unexpected demand for labour and is subject to a formal Contractor Management process. Additionally, a cohort of approximately 80 staff are sourced out of the Philippines to assist with administrative and planning tasks, with **Altus Group** maintaining oversight of compliance with local employment and labour laws as well as general working conditions. As part of ongoing professional development in Manila, the team has a dedicated national manager who, in conjunction with the CEO, visits the Manila office at least twice per calendar year. This ensures quality of training, develops rapport, allows for staff recognition and supports cultural exchange.

As outlined in previous Statements, **Altus Group** now operates a Whistle-blower program, overseen by an independent third-party, which provides an added layer of reporting capability for both internal and external stakeholders in relation to any form of alleged corporate or human rights breaches.

Direct Links and Contribution to Modern Slavery

Previous Modern Slavery Statements by **Altus Group** have noted that sourcing decisions tend to be underpinned by a combination of quality, price, supply capability and servicing levels. That is, in prior years the potential for downstream suppliers to contribute to modern slavery has not featured prominently in supplier selection. However, for essentially commoditised items such as signage, traffic control devices and personal protective equipment, it is recognised that supply chains have the potential to extend into higher risk jurisdictions.

Altus Group contractor management reviews and supply chain mapping activities confirm the limited approach to understanding, assessing and monitoring the dimensions of modern slavery and the dynamics of extended supply chains. Specifically –

- Entities who do not meet the commercial threshold for the mandatory annual submission of Modern Slavery Statements tend to have limited knowledge of the dimensions of modern slavery and no related policy, training or procedural framework in place;
- The competitive nature of pricing in sectors such as clothing/uniforms and personal protective equipment dictates decision-making on inputs resulting in a general absence of due diligence in terms of supplier screening and supply chain risk assessments to assess downstream modern slavery risk; and
- Entities not required to submit Modern Slavery Statements are less likely to respond to surveys or requests for information designed to improve supply chain visibility for entities required to report on modern slavery risk.

Ongoing dialogue with supply chain partners suggests that modern slavery risk with *direct* trading partners remains low to moderate. However, the challenges associated with developing a clear oversight of extended supply chains, some of which encroach into higher risk jurisdictions, suggests a residual potential for indirect exposure.

Addressing Risks

Against the backdrop of rapid growth and the need for continued organisational maturation, **Altus Group** has completed a full review and update of its key policy frameworks, encompassing modern slavery, but also all other relevant governance and risk matters.

This framework elevates each of the authoring, operationalisation, measurement and accountability of key policies in an integrated approach with Executive and Board oversight. Resourcing of the initiative has been undertaken to ensure that the management of risk tracks business growth both in terms of employment and revenue, but also takes into consideration the addition of new controlled entities and their respective histories, practices, and supplier relationships.

Wherein acquisition programs can lead to the expansion of suppliers initially, they eventually offer opportunities for supply chain consolidation among reputable and verified partners.

Effectiveness of Actions

Financial Year 2024 has seen the uptake of previously launched actions together with the introduction of new actions aimed at assessing and addressing the risks of modern slavery practices.

Understanding of modern slavery risks is now more common among our management teams, procurement staff and the broader workforce as **Altus Group** has embedded awareness modules into various communication opportunities. These modules are made available alongside the communication of other important initiatives we are undertaking relative to the UN Sustainable Development Goals and our key policy framework uplift more generally.

A rebranding of the third party operated Whistle-blower service as a 'Speak-Up' program has seen meaningful adoption among staff and the capture of a wide range of potential risks including matters relating to, or adjacent to the supply chain. **Altus Group** continues to give profile to this service among its employees together with education on those matters that are suitable to be covered by the program.

Modernisation and right-sizing of our Business Management System (including key policies) has provided an opportunity to improve the scope and emphasis of a range of people-focused obligations, while further reducing risks, including:

- Responsible recruitment and employment practices that are fully compliant with Employment Law;
- Assessing gender-based variances in the distribution of wages and fulfilling the reporting requirements of the Workplace Gender Equality Agency;
- Freedom of Association and collective bargaining, resulting in transparent negotiations and new Fair Work approved Enterprise Agreements; and
- Furthering policies that ensure a workplace that is free from harassment and discrimination.

Wherein internally focussed actions have been progressing effectively, the progress of externally focussed objectives has been more limited primarily as a function of lesser influence over the compliance actions of suppliers, together with the expansion of suppliers inherent in an aggressive acquisition program.

A heightened focus on supplier interactions and supply chain dynamics forms part of our Financial Year 2025 key actions, alongside further development of our internal management and control of risks.

FY25 ACTIONS
Conduct a Business Management System review, updating all documentation to reflect current practice in support of corporate governance compliance
Creation of a new senior management role – ‘General Manager – Impact and Engagement’ to co-ordinate corporate and social governance initiatives
Creation of a Corporate & Social Governance Committee – to ensure accountability for a consistent focus on corporate and social governance initiatives
Creation of a compulsory supply chain declaration statement for all supply chain providers with an assessed risk of moderate or higher together with continued assessment of modern slavery risk among the new suppliers secured as part of further acquisitions

Consultation and Approval

Consultation for this Modern Slavery Statement has included the **Altus Group** Executive, Senior Functional Managers and Procurement Staff.

Additionally, this Statement has been duly reviewed and approved by the Altus Board.



Ben Marsonet, CEO & Director
Altus Group