

Modern Slavery Statement

The APP Group

2022



The APP Group

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General

This Modern Slavery Statement for the calendar year 2022 reporting period is presented in accordance with the Modern Slavery Act 2018 and published jointly on behalf The APP Group operating under the ultimate parent company Apex TopCo Pty Ltd (ACN 647 943 173) and its wholly owned subsidiaries:

- ▶ Apex HoldCo Pty Ltd (ACN 647 945 104),
- ▶ Apex MidCo Pty Ltd (ACN 647 947 377),
- ▶ Apex BidCo Pty Ltd (ACN 647 948 605),
- ▶ APP Corporation Pty Limited (ACN 003 764 770),
- ▶ Appoint Consulting Pty Ltd (ACN 003 999 031),
- ▶ Australian Quality Assurance & Superintendence Pty Ltd (ACN 050 539 010),
- ▶ CI Australia Pty Ltd (ACN 003 053 183),
- ▶ Infrastructure Nation Pty Ltd (ACN 612 655 642),
- ▶ St George Project Services Pty Ltd (ACN 122 493 798), and
- ▶ Valorem Advisory Pty Ltd (ACN 125 899 121).

References to “The APP Group”, “APP”, “we”, “us”, or “our” are to these entities individual and collectively.

Company Overview

About Us

The APP Group was founded in 1989 and has grown to be one of Australia’s most respected property and infrastructure consultancies with over 550 people delivering end to end services across the full asset capital investment lifecycle across our 13 offices and seven brands.

We support clients across all phases of the asset capital investment lifecycle – Strategy, Definition, Delivery and Transition. Our consultancy and advisory services cover Strategic Advisory, Commercial Management, Development Management, Project Management, Real Estate, Project and Portfolio Controls, Delivery Partner, Compliance and Certification, Technical Services and Digital Integration. We have access to a broad national network of expertise across the property and infrastructure industry

Our Structure

The operating group is led by APP Corporation Pty Ltd and is supported by our wholly owned subsidiaries:

CI Australia

CI Australia sells, leases and manages a wide range of commercial real estate assets, for government, institutional and private clients.

compliance, governance, and risk management business operations.

Appoint Consulting

Appoint Consulting is a passionate and collaborative team that focus on placing the right candidate with the right organisation.

AQUAS

AQUAS is dedicated team of professionals supporting businesses to deliver solutions across

Infrastructure Nation

Infrastructure Nation bring international expertise, proven plans, commercial understanding, and a wealth of knowledge to deliver results across large scale complex infrastructure projects.

St. George Project Services

St. George Project Services is a leading Queensland project management and

infrastructure consultancy with a strong market-presence in North and Far North Queensland.

Valorem Advisory

Valorem Advisory offer infrastructure lifecycle advisory services in the transport, social infrastructure, renewable energy, and education sectors.

Our Operations and Supply Chains

In the reporting period, The APP Group operated primarily in Australia and New Zealand, a region which is recognised in the Modern Slavery Index to have a low risk. Furthermore, the inherent nature of our professional services means that the risk in our operations is comparatively low for our region. Our supply chains consist of >95% local suppliers, providing low risk services such as:

- ▶ professional services including management and technical disciplines, and legal;
- ▶ leasing of commercial office space including related utilities and services such as cleaning;
- ▶ business services including marketing, insurance, training, recruitment and audit; or
- ▶ business travel services including travel agency, air flights, car hire and accommodation.

Less than 5% of our supply chain involves suppliers operating in other regions and primarily involves information technology hardware or software subscriptions with leading global providers.

While the risk of modern slavery in our supply chain is low, risks can increase where services are provided by low skilled workers, such as cleaners, or where they are delivered in an offshore jurisdiction with higher underlying risk. We focus our risk mitigations in such areas where they arise.

Our Purpose and Values

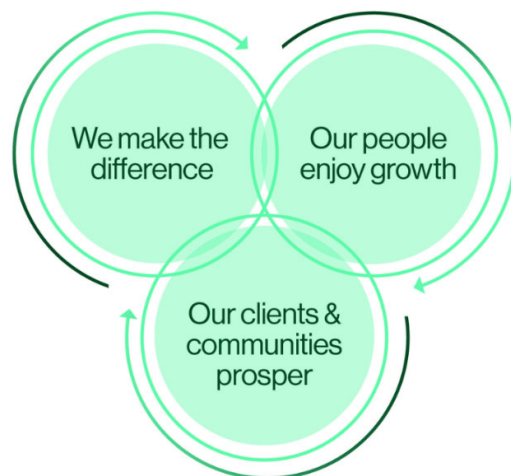
Our Purpose and Values create a cultural foundation which naturally supports the eradication of modern slavery.

Our Purpose

At APP, our people make the difference, we enjoy growth and partnering with our clients to make them and the communities in which we operate prosper.

We make the difference

We work on a diverse range of Australia’s most exciting and challenging opportunities. We share our knowledge and learning to create unique solutions and better outcomes for everyone.







Our people enjoy growth

We provide a variety of experiences, industry leading investments and flexibility. We create an environment for people to learn, advance and lead. You choose your adventure.

Our clients and communities prosper

We deliver great results for our clients and improve communities for future generations to work, play, connect and live.

Our Values

			
Own it	Strive	Do what's right	Respect
<ul style="list-style-type: none"> Take personal responsibility Own what you do Constructively confront and solve problems Advise clients as if it were your own business Challenge the status quo Have a can-do attitude 	<ul style="list-style-type: none"> Take on big challenges and see them through Passion for success and to excel Create and explore opportunities Think innovatively Deliver results every time 	<ul style="list-style-type: none"> Be open, honest and fair Follow through on commitments Commitment to the community and environment Integrity in everything we do 	<ul style="list-style-type: none"> Listen to different points of view Acknowledge and respect everyone Trust Be inclusive and supportive Teamwork Co-operate Share knowledge and ideas
Your Call	Lead the Way	Hand of Heart	Enjoy the Journey

Policies and Procedures

We do not tolerate any form of modern slavery and are committed to maintaining and improving systems and processes to prevent modern slavery within our business and supply chains. We are committed to operating in accordance with all applicable laws including the Modern Slavery Act 2018 as well as the Universal Declaration of Human Rights.

This approach is embedded in the following key policies and their related procedures which apply to all employees, subcontractors, business partners and wholly and majority-owned business ventures.

Code of Business Conduct

This Code sets out our expectations of conduct and behaviour to ensure we work safely, behave ethically, and abide by laws and regulations with all work decisions, tasks and interactions, everywhere, every day. It includes our commitment to eradication of modern slavery.

Modern Slavery Policy

This policy outlines our commitment to the eradication of modern slavery and our reporting and other legal obligations under the Modern Slavery Act 2018. The policy is aligned with this Statement. It further details our commitment to managing all aspects of our operations and supply chains in pursuit of the eradication of all forms of modern slavery including slavery, servitude, forced marriage, forced labour, deceptive recruiting, trafficking in persons and debt bondage.

Procurement Policy

This policy outlines our approach to the procurement of goods and services for our business operations. A key principle of this policy is that all procurement activities must be conducted in an ethical, safe and sustainable manner. This policy requires suppliers to support human rights throughout their supply chain in order to ensure legal and ethically sourced goods and services have been procured. In accordance with this policy, we commit to assess the risk of modern slavery in all procurement and where a risk is identified, engage with the supplier to confirm that they take reasonable steps to identify, assess and address such risks.

Human Rights Statement

This statement sets out our commitment to respecting and upholding human rights within our operations and sphere of influence. We take reasonable steps to identify, prevent and mitigate any adverse human rights impacts and integrate human rights commitments into our business practices.

Environmental and Sustainability Policy

This policy sets out our commitment to environmentally and socially responsible operations. This includes working proactively with our suppliers to procure and promote the most appropriate and sustainable solutions, and to comply with all relevant laws.

Whistleblower Policy

This policy supports the compliance with these policies by encouraging reporting of potential breaches, ensuring reporting mechanisms are accessible, and commits to the protection of any employee who report genuinely held concerns regarding our business or its operations.

Procurement and Supply Chain Due Diligence

We recognise that modern slavery risks, while low, exist within our supply chains. In alignment with our Code of Business Conduct and related policies, we undertake a range of due diligence activities of our operations and supply chains.

We assess categories of suppliers of goods and services for the potential of modern slavery in their operations or supply chains. We have a comprehensive modern slavery questionnaire, that is shared with suppliers who are assessed as having higher potential for modern slavery risk. We also engage with suppliers and workers to validate completed questionnaires and issues of concerns. We review completed questionnaires and engage with the supplier to confirm they take reasonable steps to identify, assess and address risks of modern slavery practices in their operations and supply chains.

We require suppliers to support our commitments outlined in this Statement through contractual obligations including:

- ▶ abiding by all applicable laws and regulations including international human rights and labour conventions, employment laws and the Modern Slavery Act 2018;
- ▶ complying with our Code of Business Conduct and its related policies;
- ▶ allowing us to verify compliance and to act if a non-compliance or risk is identified; and
- ▶ allowing termination of the contract if the supplier ultimately fails to resolve identified risks.

Assessment of Effectiveness

Our internal audit programme assesses the application and effectiveness of these policies and processes. Our systems are also externally audited annually and are third party accredited. For each reporting period, we select a specific risk issue relevant to our business and undertake targeted due diligence including requesting that targeted suppliers complete our comprehensive modern slavery questionnaire for our review.

There were no instances of modern slavery identified in our operations or supply chain during the reporting period.

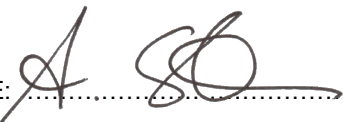
Training of Staff

Modern slavery is included in our Code of Business Conduct induction training delivered to all new staff and in annual refresher training delivered to all staff.

Our training program for Directors, Officers and key participants in the procurement of goods and services includes completion of the Australian Border Force e-learning modules on Modern Slavery in Public Procurement, Identifying and Assessing Modern Slavery, and Managing Modern Slavery Risks. We have now extended this training opportunity to key employees involved in the procurement process.

Consultation and Approval

This statement was prepared in consultation with each entity covered by this report and was endorsed by the Board of Apex TopCo Pty Ltd as the ultimate parent entity of the group on 14th April 2023.

SIGNATURE: 

Signed 17 April 2023 by Adam Castro as a Director of Apex TopCo Pty Ltd.



The APP Group

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