

Modern Slavery Statement



THIS MODERN SLAVERY STATEMENT IS MADE IN ACCORDANCE WITH SECTION 14 OF THE AUSTRALIAN MODERN SLAVERY ACT 2018 (CTH) (the Act).

INTRODUCTION AND BUSINESS STRUCTURE

This Modern Slavery Statement is a joint statement, made on behalf of all Australian subsidiary companies of Kiwa Australia 1 Pty Ltd ('Kiwa Australia'), during the company's financial year ending 31 December 2023. Kiwa Australia is the head of a consolidated group of entities and is a large proprietary company for the purposes of the *Modern Slavery Act 2018* (Cth) ('Act').

For the purpose of the Act, the Australian subsidiaries of the consolidated group are:

- Kiwa Australia 2 Pty Ltd;
- Kiwa Group Pty Ltd;
- Construction Sciences Pty Ltd;
- Construction Sciences Staff Pty Ltd;
- Construction Sciences Roadtest Pty Ltd;
- Network Geotechnics Pty Ltd;
- Trilab Pty Ltd;
- PPI Australia Pty Ltd;
- BCMW Holdings Pty Ltd;
- CMW Geosciences Pty Ltd;
- CMW Geosciences (NSW) Pty Ltd; and
- CMW Geosciences (East Coast) Pty Ltd.

Kiwa Australia recognises this opportunity as an industry sector leader to positively impact upon industry practices, to proactively identify and ultimately eliminate modern slavery in any form, be it domestically or abroad.

Across the group, each division is accountable for managing its modern slavery risks. Modern slavery risks differ between industries and therefore the group's divisions may have different areas of focus.

Kiwa Australia recognises the meaning of Modern Slavery as defined in the Act as including:

- servitude, forced labour, and deceptive recruiting for labour or services, forced marriage by

coercion, threat or deception as provided in Division 270 of the Criminal Code Act 1995 (Cth);

- trafficking of persons into, out of and within Australia including debt bondage and victim harbouring as provided in Division 271 of the Criminal Code 1995 (Cth) and as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Person, Especially Women and Children – UN Convention; and
- forced child labour as identified in Article 3 of the ILO Convention (No.182).

Kiwa Australia will continuously work closely with its suppliers, stakeholders, subcontractors and employees to enhance its knowledge and awareness of modern slavery risks. In doing so, Kiwa Australia aims to recognise and address its potential to cause, contribute to or be linked to modern slavery through its supply chain and operations.

OUR BUSINESS OPERATIONS AND SUPPLY CHAINS

Kiwa Australia, through its subsidiary companies employs 1,000+ staff in Australia and has engaged in over 50,000 projects. Its clientele includes Commonwealth, State and local governments and industry leading tier 1 contractors across the infrastructure sector, construction sector and mining infrastructure sector. Kiwa Australia services include construction material testing, owners' representative services, environmental testing, geotechnical engineering, geomechanical testing and quality assurance.

Kiwa Australia's Modern Slavery Statement sets out our mission to identify, address and ultimately eliminate modern slavery risks arising from its operations and within its industry sector. It outlines steps Kiwa Australia has already taken, such as a modern slavery compliance statement, client and supplier due diligence questionnaires and mandatory staff training and highlights those areas which will be a focus for improvement moving forward.

Kiwa Australia is committed to operating its business under an umbrella of legal compliance, staff inclusion and corporate social responsibility. Kiwa Australia is

Modern Slavery Statement



dedicated to ensuring it ethically engages with suppliers, contractors and subcontractors which hold similar values, ethics and sustainable practices. At Kiwa Australia we prioritise business with suppliers who have embedded ethical practices within their organisation and supply chain and insist that all supply chain partners operate in compliance with all applicable modern slavery laws prohibiting human slavery and slavery like practices, human trafficking and child labour. Kiwa Australia complies with all laws regarding modern slavery, corporate social responsibility, environmental and workplace health and safety, staff inclusion and diversity. Kiwa Australia has a Whistle Blower Policy and an external, independent hotline for staff and stakeholders to use. All staff receive mandatory training on how to utilise this service.

Despite the fact that modern slavery is a complex issue occurring in various forms, Kiwa Australia is actively engaging with its subsidiary companies as a group to continuously address any contentious issues across our supply chain. We have developed systems including prequalification questionnaires, conformity declarations and risk assessments to identify any modern slavery risks that may exist within our supply chain and operational framework. We have implemented practices, policies and mandatory training which establishes the expectation Kiwa Australia has across its group and all employees. Our developing strategies for remediation processes include policy assessment, evaluation, training and collaboration with our stakeholders across the group.

Being engaged in the construction materials testing, utilities locating, geotechnical and environmental engineering space within the Infrastructure industry, Kiwa Australia has a comparatively simple procurement supply chain that includes the purchase of products and services needed for the businesses day-to-day operations. These include the procurement of office and stationary supplies, IT infrastructure and support services, employment and training of staff, external consultants and other advisory services when required, leasing and/or purchase of plant and laboratory equipment, motor vehicle leasing, leasing of office space, and travel booking services.

Kiwa Australia recognises the risk of modern slavery within its operations and supply chains. Due to the nature of our operations and the services we provide, including the services within our supply chain, we consider the risk of modern slavery to be low. However, Kiwa Australia endeavours to recognise and mitigate any potential modern slavery risks by continuing to build upon and enforce the approach outlined below.

KIWA AUSTRALIA'S APPROACH TO PREVENTING MODERN SLAVERY RISK, REMEDIATION AND ASSESSMENT OF EFFECTIVENESS OF PROTOCOLS.

Kiwa Australia's executive management team in collaboration with its in-house legal, finance, procurement, human resource and operations teams are working collectively to ensure a company group-wide responsibility for ongoing compliance with the Act.

The entities outlined above as comprising Kiwa Australia for reporting purposes, are overseen by the same Board, executive management team, legal, finance, procurement and human resource teams. Accordingly, consultation for each of those entities is largely one and the same, with some minor variations in operations.

A description of Kiwa Australia's supply chain and operational categories is summarised below:

Supply / Operational Category Risk Overview

Procurement of office and stationary supplies: Sourced exclusively from locally based suppliers subject to Federal and State laws. Items manufactured overseas may have complex supply chains.

IT infrastructure and support services: Sourced domestically from a supplier. Products are manufactured by multinational companies that are subject to modern slavery compliance.

Employment and training of staff: All training services are locally based training providers and all employment is subject to Federal and State laws.

Modern Slavery Statement



Advisory services: All advisory and consultancy services are locally engaged and are subject to modern slavery compliance.

Leasing/purchase of automotive, plant and laboratory equipment: All plant and laboratory equipment are sourced from a domestic supplier. Whilst materials and machinery within plant and other equipment may have complex layers of supply chains, the equipment is ultimately assembled and manufactured by multinational companies that are subject to modern slavery compliance.

Subcontracting entities: Locally based entities subject to Federal and State laws. Compliance is not limited to modern slavery but to other closely related illegal and fraudulent activities. Kiwa Australia operates under a Third Party Due Diligence policy and process for engagement of subcontractors on all project work.

Clients: Federal, state and local governments and tier 1 contractors, all of which are subject to modern slavery compliance and federal and state laws. Smaller clients are local entities.

Whilst Kiwa Australia's procurement supply chain is relatively simple, it is committed to expecting compliant standards of corporate responsibility, legislative and regulatory compliance as well as demonstrated due diligence processes from its supply chain partners, subcontractors, employees and clients. Kiwa Australia recognises that this is a continuous and evolving process and it has identified subcontractors as a potential risk within the infrastructure and construction sector in which it operates. Kiwa Australia has developed (and will continuously review and improve) our subcontractor prequalification process requiring our subcontractors' confirmation of compliance with modern slavery requirements. Irrespective if subcontractors qualify as a reporting entity as defined by section 5 of the Act or not, Kiwa Australia insists (at a minimum) the following compliance:

- If in Queensland, Victoria or South Australia that entities comply with the *Labour Hire Licencing Act*

2017 (QLD); Labour Hire Licencing Act 2017 (SA) and Labour Hire Licencing Act 2018 (VIC);

- Confirmation from subcontractors that employees are paid in accordance with legislative, regulatory and/or bargained awards for wages and hours worked; and
- Confirmation that foreign workers have the correct visa documentation which allows them to legally work in Australia.

These steps are an integral step in Kiwa Australia's onboarding process to eliminate sham contracting as well as the exploitation of workers in labour hire arrangements.

Although the underpayment or delayed payment of workers; inadequate or inferior working conditions; undue hours without receiving the obligatory penalty pay rates are not strictly considered modern slavery, Kiwa Australia recognises that these practices are illegal and can lead to exploitation, coercion and threats which may develop into modern slavery. Kiwa Australia's remediation process begins with identification and reporting of potential breaches of any Kiwa Australia policies including modern slavery. Kiwa Australia's Whistle Blower Policy ensures its employees can confidently report any discrepancies they may identify with the assurance of anonymity. Its employees have received induction and ongoing training and awareness of the Whistle Blower Policy, the Hotline and also the direct access to report indiscretions to our in-house legal team in strict confidence. If an indiscretion or breach is identified, Kiwa Australia's remediation process begins with its legal and management teams.

In order to assess the effectiveness of these actions, the steps Kiwa Australia undertakes and continuously strives to improve upon include:

1. Assessing (and reporting) the risks in its operations and supply chains with emphasis on high-risk geographical locations, supply chains and business transactions to ensure compliance with the Act. As noted above, Kiwa Australia has identified underpayment, excessive working hours and sham contracting as a particular risk within our

Modern Slavery Statement



- industry which can lead to modern slavery;
2. Continuous development and the review of our Modern Slavery Statement and protocols including our Code of Conduct, Diversity and Inclusion Policy, Whistle Blower Policy, Anti-Corruption and Bribery Policy as they apply throughout our operational and supply chains;
 3. Annual compulsory Code of Conduct and Anti-Bribery and Corruption training for staff. This training educates staff on the presence of modern slavery risks in Kiwa Australia's industry sector and outlines the steps we take to mitigate modern slavery risks in our supply chains and operations. It also outlines how staff can report any discrepancies or modern slavery concerns. This also includes annual Code of Conduct training and awareness of direct and confidential access to Kiwa Australia's in-house legal team;
 4. Continuous development of onboarding and due diligence processes for supply chain partners and stakeholders, contractors and subcontractors to ensure compliance with the Act. Kiwa Australia ensures that the values of its stakeholders do not only comply with modern slavery or other legislative requirements but also that they acknowledge and operate within the parameters of its Code of Conduct and other policies;
 5. Legal review of all supply partner, contractor and subcontractor contracts and agreements to ensure they contain terms that align with both Kiwa Australia's governance policies and are compliant with the requirements of the Act;
 6. Creating processes to monitor, identify, educate, discuss and address any potential modern slavery risks that may be identified in either Kiwa Australia's upstream or downstream contracts and supplier partner agreements; and
 7. Creating a modern slavery monitoring process to measure and report the effectiveness of Kiwa Australia's and its supplier partners compliance

with the Act. This process will continue to evolve annually with Kiwa Australia's Modern Slavery Statement.

Kiwa Australia's primary initial focus is to consult with the reporting entities it owns and controls to identify risks within its supply chain network. This consultation is underway and ongoing. Kiwa Australia's view is that only once those risks have been fully identified, can it focus on implementing systems into its operations to address those risks.

Though Kiwa Australia acknowledges its current measures are effective, it is committed to continuous review to assess the effectiveness of its risk identification and mitigation strategies. Kiwa Australia will continue to screen its suppliers, contractors and subcontractors for modern slavery risks. Central to the evaluation process is regular consultation, yearly training and interaction with the companies under its control. In this reporting period, each company has contributed to and implemented Kiwa Australia's modern slavery policy and participated in the review of its systems. Included in this process was the insertion of modern slavery clauses in all external-facing contracts.

With an established, confidential reporting system in place for staff and stakeholders to voice concerns with complete anonymity, Kiwa Australia will continue to monitor any reports related to modern slavery risks. Kiwa Australia did not receive any reports related to modern slavery during this reporting period.

For future reporting periods Kiwa Australia will build upon these systems in consultation with the companies under its control and their supply partners. Kiwa Australia is committed to evaluating and recording the outcomes of these actions and to adapt as required for continuous improvement and to address any emerging risks.

This Modern Slavery Statement was approved by the Board of Directors of Kiwa Australia 1 Pty Ltd on 11 June 2024.

A handwritten signature in blue ink, appearing to read "M. Courtney", written over a faint rectangular box.

Matthew Courtney
Chief Executive Officer
Kiwa Australia 1 Pty Ltd