



# Modern Slavery Statement 2025

JBS&G Australia Pty Ltd

(Rev 3)

19 December 2025





## 1. Who we are

This statement covers JBS&G Australia Pty Ltd (JBS&G) (ABN 62 100 220 479) an environmental consultancy located wholly within Australia, employing over 300 people, and its wholly owned non-trading subsidiaries:

- JBS&G Services Pty Ltd (ABN 22 164 539 673)
- Easterly Point Environmental Pty Ltd (ABN 40 164 670 526)

The directors and company secretary of each of these entities are roles that are fulfilled by the same individuals. Therefore, each of these entities has been consulted in the preparation of this statement and covers their operations. Only JBS&G Australia Pty Ltd traded during the reporting period. Both subsidiaries were divested on 18 December 2025.

JBS&G is proudly employee owned since its inception more than 20 years ago. We are governed by our Board of Directors and led by our CEO. We have a strong and passionate leadership team responsible for all operational and management activities, working closely to guide and mentor employees whilst ensuring the needs of our clients are met.

## 2. Our commitment

JBS&G supports the world-wide initiatives to eradicate modern slavery, including the United Nations Universal Declaration of Human Rights. We are committed to working with all our stakeholders to ensure that collectively we bring an end to modern slavery and ensure we all comply with the requirements of the *Commonwealth Modern Slavery Act 2018* (Cth) and the *New South Wales (NSW) Modern Slavery Act 2018*.

We respect the human rights of everyone involved in our operations and supply chains and all our employees are responsible for identifying and managing modern slavery risks, obligations and issues on an ongoing basis.

JBS&G complies with all applicable laws governing non-discrimination in employment and provides equal employment opportunities regardless of race, religion or gender.

## 3. Risks of Modern Slavery

At JBS&G we believe that the risks of modern slavery practices within our operations and supply chain are minimal - almost all our suppliers are located in Australia, with less than 1% procured from overseas for specialist equipment.

As a professional services company working predominately in Australia and are not involved directly in overseas mining, construction, agriculture, or other high-risk sectors. JBS&G's in-country service suppliers (sub-contractors) are similarly low risk.

JBS&G's workforce is wholly located in Australia and over 99% of our projects are conducted within Australia. We operate with a small value of fixed assets in categories of motor vehicles and computer equipment.

The areas of the supply chain that pose higher risks are with the suppliers of office consumables and laboratory consumables.

## 4. Mitigating actions

We understand that "reasonable steps" in the context of modern slavery risk management involve actively identifying, assessing, and mitigating risks within our supply chain.

To manage this, we take the following steps:

1. **Risk Identification:** We assess our supply chain based on industry, location, and service type. For example, drilling companies operating in remote locations may present a higher risk, so we verify that subcontractors comply with labour standards.
2. **Supplier Engagement:** We conduct due diligence when engaging subcontractors by requesting information about their employment practices, policies, and compliance with modern slavery laws.
3. **Contractual Obligations:** We include modern slavery clauses in contracts with subcontractors, requiring adherence to fair labour practices and compliance with legal frameworks.
4. **Monitoring and Review:** We periodically review our subcontractors' policies and assess risks that may emerge over time.

We do not anticipate modern slavery within our supply chain, however we have processes in place to document and address any reported concerns. These include:

1. **Incident Reporting Mechanism:** Our employees and subcontractors can report any concerns regarding modern slavery through our Integrated Management System reporting mechanism or through our Whistleblower Policy and Procedure.
2. **Record-Keeping and Documentation:** We maintain records of all subcontractor due diligence checks, risk assessments, and any reported issues related to modern slavery.
3. **Investigation and Response Process:** If an issue is identified, we conduct an internal review and work with relevant authorities or legal advisors to take corrective action.
4. **Review and Training:** We periodically review our modern slavery risk management approach and provide training to employees on identifying and reporting potential risks.

## 5. Effectiveness

JBS&G determines the effectiveness of our actions by:

1. Including Modern Slavery on our Risk Register making it part of the annual management review, as well as ensuring risk assessments are undertaken if we commence operations in a high-risk country or region.
2. Tracking the number of due diligence responses received from our suppliers.
3. Tracking how often modern slavery clauses are invoked in our subcontractor contracts and review contract language periodically as legislation and best practice evolves.
4. Undertaking periodic audits of suppliers and subcontractors to review the due diligence responses against their policies and procedures.

## 6. Future actions

We will continue to build on this work by:

- strengthening our supplier engagement and audit processes;

- regularly reviewing the relevant policies;
- increasing transparency in our supply chain; and
- reporting annually on our progress.

## 7. Approval

This statement has been developed to comply with the requirements of the Australian Modern Slavery Act 2018. It has been approved by JBS&G's Board of Directors and CEO.

A handwritten signature in black ink, appearing to read "P. Doak", with a horizontal line extending from the end.

Polly Doak

Chief Executive Officer

19 December 2025



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