

JOINT MODERN SLAVERY STATEMENT

Financial Year ending 30 June 2022

Introduction

Fulton Hogan Australia Pty Ltd (FHA) submits this Modern Slavery Statement for the financial year ending 30 June 2022.

This joint statement is provided in accordance with the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**), and sets out the actions taken by FHA and its wholly owned and controlled entities to identify, assess and address modern slavery risks in its operations.

Fulton Hogan is committed to acting ethically and with integrity and transparency in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

In order to achieve that purpose, FHA adopted a uniform Anti Modern Slavery Process in 2019 which provides mandatory requirements and guidance on how to identify and prevent modern slavery in FHA and its supply chains. The process requires FHA to undertake the key actions described below.

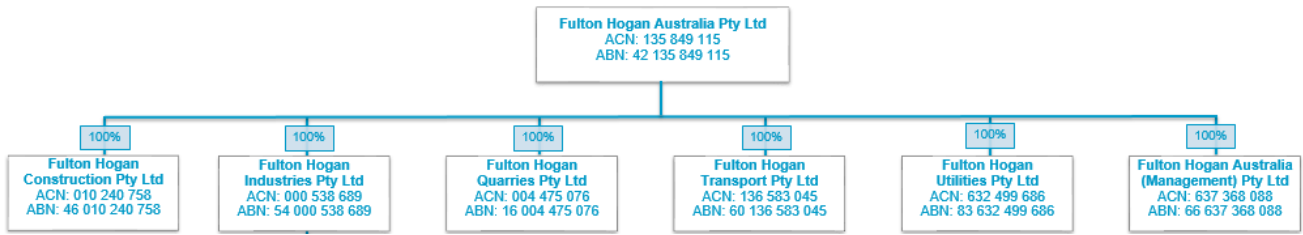
Our operations and structure

Founded in New Zealand in 1933, then in Australia in 1981, Fulton Hogan is a leading infrastructure and civil engineering company with more than 80 years' experience in the infrastructure, transport, water, and telco sectors and employs over 3,700 people in regional and city-based locations across Australia.

The Fulton Hogan Group is comprised of 35 controlled entities globally, predominantly in Australia and New Zealand. The ultimate parent entity in the Fulton Hogan Group is Fulton Hogan Ltd. FHA is the holding company of 10 of Fulton Hogan's Australian based controlled entities.

This statement covers FHA and each of the entities it controls. FHA is the reporting entity required to issue this statement under the Modern Slavery Act.

A simplified structure of the Fulton Hogan entities covered by this statement is as follows:



Supply Chain

FHA’s supply chain is complex, having regard for the diverse nature of FHA’s operations. The suppliers within our supply chain include providers of a variety of goods and services including but not limited to the supply of corporate uniforms and personal protective equipment, construction materials including raw resources, machinery and equipment hire, car leasing, professional services (design), subcontractors, communications services, traffic management solutions, security services such as fencing, waste and recycling facilities, information and technology, painting and coating, labour hire and environmental landscaping.

While the majority of our suppliers and subcontractors are based in Australia, there are some based overseas.

Risks of Modern Slavery Practices

FHA prohibits any form of modern slavery within its direct operations.

All of our direct employees are engaged under employment contracts or enterprise bargaining agreements that are in accordance with Fair Work Australia’s National Employment Standards. We comply with all applicable employment legislation and industrial awards, and none of our employees are paid less than the minimum wage. We also comply with all superannuation and leave requirements.

In addition, the safety of our employees is paramount, underpinned by our Living Safely Policy.

For those reasons, FHA considers that it is unlikely to have a risk of modern slavery in its permanent workforce.

Where FHA considers there may be an element of risk of modern slavery is in the supply chains of FHA, particularly in the lower tiers of supply chains and jurisdictions outside of Australia. This includes third party labour hire providers, as well as migrant workers.

To minimise that risk, FHA is committed to working with subcontractors and suppliers to ensure their practices are aligned with FHA’s expectations concerning modern slavery, and has in place clear

procurement policies described below to assist in identifying risks of modern slavery in its supply chains.

Key actions to assess and address the risk of Modern Slavery

Our Anti-Modern Slavery Process applies to FHA and each of the entities that it controls. Therefore, our approach to modern slavery within Australia is 'group wide'.

The Anti-Modern Slavery Process incorporates the following as part of its overall strategy to address risks of modern slavery:

- **Fulton Hogan Code of Conduct:** Our Code of Conduct is based on our values, policies, procedures guiding our daily work and demonstrates our commitment to uphold proper and ethical business practices. The Code is accessible on our internal website and all employees are required to be aware of it and comply with it.
- **Procurement Processes:** FHA has a centralised procurement process including policies and procedures surrounding modern slavery practices of those within our supply chain. As part of this practice, we undertake due diligence checks and certifications from our suppliers by having them complete a modern slavery questionnaire to establish whether or not they engage in modern slavery practices. This due diligence check is critical to ensuring compliance with our Anti-Modern Slavery Process.
- **Contractual Obligations:** FHA's contract templates include relevant contractual prohibitions against suppliers/subcontractors engaging in modern slavery practices. They also contain provisions requiring subcontractors to certify that all statutory requirements and wages have been paid, and to comply with our extensive safety regime and standards, again reducing the risk that FHA will contribute to modern slavery practices.
- **Labour Hire Providers:** FHA only engage reputable and licensed labour hire service providers.
- **Training:** FHA's Code of Conduct Module is an internal training module that includes a section relating to Modern Slavery, including an overview of the meaning of Modern Slavery, how to raise concerns and a scenario question.
- **Reporting framework:** All FHA employees are required to raise concerns in accordance with a specified reporting framework if they believe that any Fulton Hogan employee, contractor, supplier or other external party in its supply chains is involved in any of the prohibited practices. Any such reports are to be investigated.

How we measure effectiveness

During the reporting period, we were not aware of any modern slavery within FHA, or any modern slavery which FHA has contributed to or is directly involved with.

We measured the effectiveness of our Anti-Modern Slavery Process by:

- undertaking an analysis of employees who had completed FHA'S Code of Conduct Module (which indicated 63% (and 83% by the date of this Statement) of salaried employees had completed as at the end of the reporting period);
- conducting an internal review as to compliance with our Anti-Modern Slavery Process.

We will continue to adopt these steps moving forward. In the next reporting period, FHA also intends to review its current internal review framework to develop additional audit processes for those supply chains that it identifies as being at higher risk of containing modern slavery risks, namely third party labour hire providers and those operating in jurisdictions outside of Australia.

Consultation

The aims of the Anti-Modern Slavery Process include providing clear and uniform guidance across FHA and the entities that we own or control.

As the reporting entity and in preparing this statement, FHA consulted with the entities that it owns or controls. In particular, a copy of this statement was provided to the following internal stakeholders to confirm its accuracy:

- the procurement team responsible for implementing the processes and systems the contained in the Anti-Modern Slavery Process;
- the FHA CEO, as well as the CEOs of the key operating entities, namely Fulton Hogan Construction Pty Ltd, Fulton Hogan Industries Pty Ltd and Fulton Hogan Utilities Pty Ltd.

Approval of Modern Slavery Statement

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) and has been approved by the Board of Fulton Hogan Australia Pty Ltd



Cos Bruyn
Managing Director, Fulton Hogan Ltd