



BG&E Group

MODERN SLAVERY ACT STATEMENT FOR FINANCIAL YEAR 2020/2021

This statement is intended to meet the requirements of section 54 of the Modern Slavery Act 2015 (UK) and section 13 of the Modern Slavery Act 2018 (Cth).

This statement sets out the steps that the BG&E Group of Companies, including BG&E Pty Limited and BG&E Consulting Engineers, is taking to identify, assess and minimise the risk that modern slavery or human trafficking is taking place within our business or supply chains.

BG&E acknowledges its responsibilities in safeguarding human rights through ethical and sustainable business practices in accordance with the United Nations Guiding Principles on Business and Human Rights and applicable local rules.

Modern slavery includes slavery, servitude, debt bondage, human trafficking and forced labour. BG&E has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to having effective systems and controls in place to minimise the risks of any form of modern slavery taking place within the business or our supply chains.

Our business

We are an employee-owned consulting engineering group of companies headquartered in Australia with subsidiary and related corporate entities operating from offices in the Middle East, Singapore, and the United Kingdom.

BG&E provides professional engineering services nationally and internationally to a range of countries such as UAE, Qatar, Bahrain and Saudi Arabia in the Middle East, Singapore, Indonesia and India in South East Asia, and the UK, Denmark, Serbia and Cyprus in Europe. Our engineering services incorporate designs for infrastructure, building structures, civil engineering, facades, water, and construction support for a diverse range of clients such as government agencies, construction contractors and developers. We also provide specialised advice in the discipline of materials technology. We focus on the technical aspects of civil and structural engineering in order to provide our clients with solutions that are practical and efficient and that incorporate our experience in constructability and innovation.

The majority of our workforce comprises salaried skilled professional staff. We employ specialist subconsultants as required in all our areas of operation, generally for professional services in particular areas of expertise such as geotechnical engineering, environmental engineering and surveying.

BG&E also engages a number of other ancillary entities as part of its supply chain, such as cleaners, administrative assistants and IT.

BG&E acknowledges that the risks of modern slavery practices in its operations potentially arise in BG&E's project locations, services supply chains and partnerships with other entities, particularly with projects originating in developing countries.

Risks that BG&E are monitoring include:

- Forced or unpaid labour;
- Unsafe working conditions;
- Responsible sourcing of products; and
- Contravention of minimum wage conditions.



Our policies

We operate a number of internal policies to ensure that we are addressing the potential risks of modern slavery within our entire supply chain and conducting business in an ethical and transparent manner. These include:

1. **Anti-bribery and corruption** policy and practices.
2. **Recruitment** policy and practices. We operate a robust recruitment policy, including conducting eligibility to work checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. Recruitment is typically conducted through registered labour agencies for the provision of professional staff.
3. **Staff Employment Guide**. All employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. Our whistleblower policy has further details on this.
4. **Code of business conduct**. This code explains the way we behave as an organisation and how we expect our employees and suppliers to act. Our whistleblower policy has further details on this.
5. Our **Grievance and Dispute Resolution** and **Whistleblower policies** allow concerns to be raised, identified, and addressed.
6. **Subconsultants Management Procedure**. This procedure describes the process on how we identify, appoint and manage our supply chain partners, and includes an annual questionnaire requesting information on their policies, including Modern Slavery and whistleblowing to ensure alignment with our commitment.

Actions

BG&E has strong management capability that is responsible for strategy development and execution and is guided by a corporate risk framework and supported by a Quality & Risk Management Committee and a Risk Management Group. The Board, Executive Leadership Team, QRMC and the Risk Management Group all operate under charters that provide detail on roles, responsibilities, and ethical conduct.

BG&E is constantly improving its modern slavery policy and practices and assessing its modern slavery risks, inclusive of our supply chain. Its objectives are to:

1. Assess potential clients and suppliers for modern slavery risks before appointing them;
2. Conduct risk assessments which identify actual or potential modern slavery risks;
3. Enter transparent and formal contracts with suppliers rather than utilise informal arrangements;
4. Requires suppliers to comply with Modern Slavery legislation (and cascade those obligations through their supply chains);
5. Uses its best endeavours to oblige suppliers to act in accordance with the Act and our code of conduct and policies;
6. Provide appropriate training to its staff on modern slavery obligations;
7. Monitor compliance with the above throughout its business through consultation within its business and its internal systems, processes, and reporting requirements; and
8. Develop a remediation plan.

Our performance indicators

The Board is committed to reviewing its business model in light of modern slavery risks.

BG&E is committed to monitoring and assessing the effectiveness of its actions, to detect and mitigate the risks of modern slavery in our operations and supply chain. We plan to conduct an annual review of our policies, procedures, reporting mechanisms and risk assessment framework.

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business:

- From the results of our anti-slavery audits and investigations
- From whistleblowers
- If no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- If internal auditing does not show any breaches of increased risks of modern slavery occurring within our business operations.

Contacts

Please contact Rick Kreeck, Chair of QRMC or Jennifer Lord, General Counsel, details provided below:

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Approval for this statement

This statement was approved by the Board of Directors on 30 June 2021.



Frank Cerra (Managing Director)