



A CSE Global Company

2022 Modern Slavery Annual Statement

For the period ending December 31, 2022



FY 2022 Modern Slavery Statement

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FY 2022 Modern Slavery Statement

1. Introduction

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act (2018) (Cth)* and outlines CSE Global (Australia)'s commitment to combat modern slavery in all its forms. As a responsible and ethical organisation, we are dedicated to preventing modern slavery within our operations and supply chains. This statement outlines the steps we have taken so far to address modern slavery risks and ensure compliance with the Act.

This Statement is prepared by CSE Global (Australia) Pty Ltd (ABN 85 109 958 090) and each of its wholly owned subsidiaries (together referred to as CSE) under the rules of the *Modern Slavery Act 2018 (Cth)* (Act) for the financial year ending December 31, 2022. (CSE's annual financial reporting being January to December each year).

2. About CSE

Throughout Australia and New Zealand (ANZ), CSE have offices located in Western Australia, Northern Territory, New South Whales, Victoria, Tasmania, Queensland, South Australia, Auckland and Wellington, plus regional offices throughout some Australian States.

Our technology areas are electrical, automation, instrumentation, and telecommunications. We provide engineering, integration, product sales, radio rental systems and maintenance to customers operating the oil and gas, mining and refining, transportations, utilities, healthcare, security, retail, and construction industries.

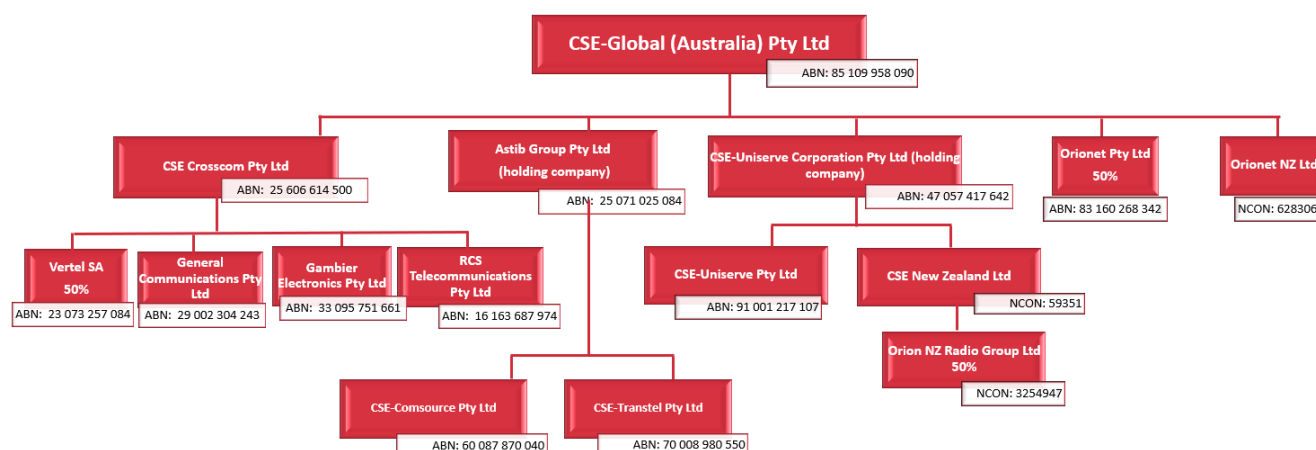
Our supply chain is comprehensive, encompassing suppliers and partners located both locally and globally, and we are committed to ensuring that modern slavery does not occur at any level within this chain.

3. Our Structure and Operations

Our headquarters for the ANZ region are located in Perth, Western Australia.

During the reporting period CSE provides this statement for itself and on behalf of all subsidiaries directly affected by a disclosure obligation in their respective jurisdictions. These are depicted in the Organisation Chart Below

Figure 1 - CSE Global Australia / New Zealand Group Company Structure



At the start of FY 2020 CSE Executive Management set out the principals of the *Modern Slavery Act (2018)* (Cth) and the new policies, procedures and framework were rolled out to all business entities. Each year, Executive Management are consulted with on the development of the Annual Statement, changes to policies and/or procedures and any updates required to keep them informed and abreast of the Act. Details regarding the actions we, as a leadership team, intend to take during the year are discussed and adopted.

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4. Governance

CSE is overseen by a Board of Directors responsible for the overall governance and strategic direction of the organisation and for reviewing the delivery of acceptable corporate performance as it relates to business and community.

Operational leadership is delivered by our Chief Executive Officer (CEO) and the Executive Team members, who collectively drive the implementation of our strategic and operational plans and values.

At the start of our Modern Slavery journey, CSE implemented a team to manage Business Continuity with a mandate to guide the business through crisis management issues, compliance matters, and risk mitigation. The team, known as the Business Continuity Planning Group (BCPG), consists of subject matter experts who with their knowledge and understanding are able to implement and lead preventative actions in all fields of business continuity. This team consists of:

General Manager Human Resources
HSE Manager
Quality and Business Improvements Manager
ICT Manager
Group Commercial Manager
Executive Assistant to the CEO

During 2020, our Modern Slavery and Human Rights Framework was incorporated into the function of the BCPG, and since then the BCPG meets annually with the topic of Modern Slavery and Human Rights forming part of the agenda. Matters such as policy, supply chain due diligence and internal employee training and awareness are agenda items covered and discussed.

5. Our Policies

Over the past twenty-four months, CSE have reviewed policies that would encompass the way we treat our people and engage with our supply chain and communities with the view to introduce statements and actions that would mitigate the risk of modern slavery and human rights abuse within our organisation and our supply chain.

Policies and Procedures that have been implemented or updated to include our commitment to the *Modern Slavery Act (2018)* (Cth) include:

1. Implementation of a **Modern Slavery and Human Rights Framework**. A framework that demonstrates our commitment to attaining a culture that fosters and promotes the human rights of our people, suppliers, customers, communities, and other stakeholders. The policy outlines the definitions of modern slavery, our zero-tolerance stance, and the actions to be taken if any suspicions or incidents arise.
2. Our **Subcontractor Code of Conduct** was updated during 2022 to encompass all vendors (being both suppliers and subcontractors) and is now referred to as **Vendor Code of Conduct**. This Code mandates our suppliers and business partners to comply with the principles of the Act. The Code emphasises the prohibition of modern slavery practices, child labour, forced labour, and human trafficking. It also outlines our expectations for transparency, due diligence, and reporting requirements.
3. Our **Bullying, Harassment and Discrimination Policy** ensures our employees can attend work in an environment that is positive, supportive, and safe.
4. Our **Recruitment Procedure** includes:
 - a. A minimum age policy in line with the *United National Guiding Principles on Business and Human Rights*.
 - b. Working hours are applicable with local laws.
 - c. Prevents us from withholding original documents such as passports and driver's licenses.

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- d. Only engaging with recruitment agencies that have qualified and registered through our due diligence and self-assessment programs.
 - e. Standard employment contracts in line with *Fair Work Act (2009)*.
5. We have a **Code of business Ethics Policy and Guidelines (COBE)**, which is reviewed annually and distributed to all employees. We require our employees to review the guidelines and complete a COBE declaration every twelve months to identify and declare any possible conflicts of interest. Matters covered include (but not limited to) fraud, bribery, corruption, and theft.
 6. A **Whistle Blower Policy** that provides a safe pathway for employees to discuss or lodge an issue or complaint where they will be listened to in a safe and protected environment.
 7. Our **Procurement Manual** ensures that our supply chain due diligence has been conducted on all new suppliers and subcontractors prior to engagement.

6. Taking Action to Address the Risks

6.1. Supply Chain

During 2020, we implemented our Self-Assessment Questionnaire and Declaration which is completed by our supply chain partners. The declaration provides us with the information we use to help understand, identify, and mitigate against modern slavery and human rights risks within our supply chain. Throughout 2022 we continued with our supply chain assessments of our pre-existing suppliers.

Our aim is to work transparently with our supply chain towards the achievement of the program set out by the *United Nations Guiding Principles of Business and Human Rights*.

In FY 2023, we will endeavour to continue our supply chain due diligence, where we will seek evidence that our supply chain is working towards measures that identify and mitigate against modern slavery and human rights abuse.

We also intend to commence our supply chain mapping program, which will start to identify the geographical regions and locations where goods and equipment are manufactured; as well as industry sectors and the nature of the products or services involved. This will better enable CSE understand our supply chain risk and actions needed to mitigate against these risks.

In 2022, we updated our Supplier and Subcontractor Agreements to include arrangements that require full compliance with the *Modern Slavery Act (2018)* (Cth) and relevant CSE Policy. Updates to our New Supplier Questionnaire and New Subcontractor Questionnaire were also made during 2022. This is to ensure that all new vendors will meet the requirements of the Act during their initial onboarding. Pursuant to section 5, our Subcontractor Code of Conduct was updated to include all vendors and not just subcontractors.

6.2. Workforce

As at the end of FY 2022, CSE employed 318 people. Under the guidance of our General Manager, Human Resources, the Human Resources Team ensure we recruit the right people for our business and that we provide a safe and secure environment for them. The Human Resources Team is responsible for delivering the framework that encourages our staff to develop and participate in our vision, values and culture. We aim to ensure that all employees are empowered to contribute and make a difference.

Our employees are engaged on standard employment contracts, aligned to relevant awards operational within our industries.

During 2022, 94% of our employees were on full-time/part-time permanent employment arrangements. We had 4% of employees under a fixed-term-contract, including two on working visa arrangements, and the balance of 2% under casual employment arrangements.

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The figures below represent our employee ratio and breakdown by Business Entity and employment category:

Figure 1 - Business Entity Representation (FY 2022)

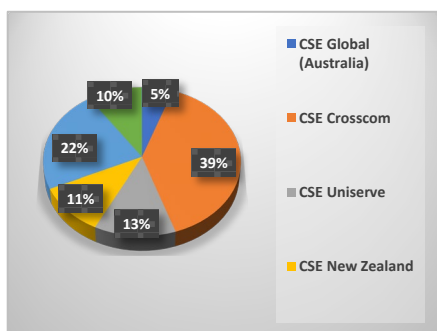
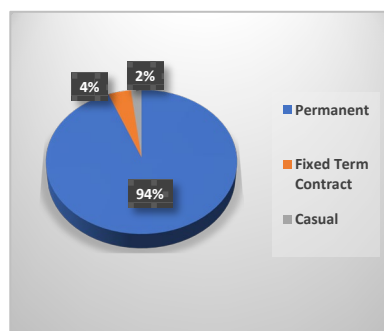


Figure 2 - Employment Status (FY 2022)



The workforce includes a mix of engineers, technicians, management, finance, and administration personnel, as well as apprentices and trainees. We consider the risk of CSE contributing to modern slavery through our employee engagement as extremely low.

We ensure our people are remunerated fairly, have fair and equitable employment conditions and contracts and have policies and procedures in place that would govern and prevent any risk of modern slavery or human rights abuse.

CSE is committed to cooperating with relevant authorities in the fight against modern slavery. If any concerns related to modern slavery arise within or outside of CSE, employees are encouraged to report such concerns to confidential@cse.net, the Group Commercial Manager or CEO.

6.3. Training

Our modern slavery and human rights program are dependent on the practical understanding of our people. Over the past two years, CSE has embarked on delivering several training events for our senior management and employees. This includes the provision of information on our SharePoint platform and the inclusion of this topic in our Toolbox Talks.

Over the course of 2022 and ongoing monthly, CSE provides a webinar for all staff with topics that cover matters such as diversity and inclusion, bullying and harassment and fair communications. All employees are encouraged to register for these online events.

Our new employee inductions include a section on modern slavery and human rights to inform new employees about our policies, procedures, corporate social responsibility and how to identify and report suspicious activity.

6.4. Labour Hire

CSE engages labour hire employees on an extremely low occurrence, and at the time of writing, there were no labour hire employees engaged within the businesses.

Labour hire agencies must be recognised as a CSE approved supplier and have completed and passed all modern slavery checks before being engaged.

The use of labour hire employees can only be approved and coordinated through our Human Resources Team.

We believe the risk of modern slavery through our labour hire agencies to be extremely low.

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7. Measuring our Actions

CSE implemented the below table in FY 2020 to ensure we stay on track with our commitments, and we continue to measure and assess our progress as we move forward on this journey:

Table 1 - Modern Slavery Measures and Assessment

AREA	ACTION	MEASURE
Governance	<ul style="list-style-type: none"> Employee training Policy reviews Supply chain management and disclosure Board approval and oversight Agreements/Contracts New Supplier and Subcontractor forms 	<ul style="list-style-type: none"> # Of team trained Annual review of policies and procedures Quarterly review of supply chain declarations Annual report to CEO All Agreements/Contracts to contain modern slavery commitments All new supplier and subcontractor forms to contain modern slavery commitments
Review	<ul style="list-style-type: none"> Internal audits Supplier self-assessment questionnaire 	<ul style="list-style-type: none"> Include modern slavery into our internal audit procedure with 100% compliance Monitor self-assessment questionnaires for 100% compliance
Risk	<ul style="list-style-type: none"> Enterprise Risk Register Supply chain entry 	<ul style="list-style-type: none"> Annual risk assessment Review of supply chain onboarding paperwork 100% compliance
Reporting	<ul style="list-style-type: none"> Cases raised Channels used to raise the cases 	<ul style="list-style-type: none"> Total number of cases reported internal and/or external Mechanisms used to raise a case (Whistle-blower or open reporting)

8. Next Steps

Looking forward, CSE will continue to strengthen its efforts to combat modern slavery. We will refine our policies, procedures, and due diligence processes to address emerging risks. We will also collaborate with our stakeholders, including suppliers, customers, and industry peers, to create a collective impact in eradicating modern slavery from our supply chains.

During 2023 we will:

1. Commence mapping our supply chain geographical regions and industry sectors;
2. Review and develop a risk register to ensure our actions are measured and sufficient;
3. Continue with training and development for our employees; and
4. Continue with supply chain due diligence and self-assessment.

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9. Supply Chain Appreciation

CSE would like to take this opportunity to place on record our appreciation of our supply chain in collaborating with us on this important matter. CSE is committed to continue collaborating with our suppliers, raising awareness and embarking on this journey of continuous improvement.

Our suppliers are pivotal to the success of our operations, and we recognise the importance of their support in creating sustainable value for our customers, shareholders, employees, and communities.

10. Approval and Signature

This disclosure describes the efforts CSE has taken in our own business, as well as with our supply chain, to work towards the eradication of slavery and human trafficking. These efforts as well as this disclosure, are updated annually with input from stakeholders, reviewed and approved by our Board of Directors.



William Roy Rowe
Chief Executive Officer
CSE Global (Australia) Pty Ltd
30 June 2023