



# MODERN SLAVERY STATEMENT

Financial Year 2023



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## 1. ABOUT OUR STATEMENT

RSK Environment Australia Pty Ltd (RSK AUS) has prepared this Statement as a joint statement covering RSK and the other Reporting Entity (identified in Annexure 1) in compliance with the *Australian Modern Slavery Act 2018(Cth) (the Act)*.

This is RSK Environment Australia Pty Ltd First Statement and covers the FY23 reporting period. The Statement discloses the actions we have taken to identify, endeavour to mitigate and account for how we address our modern slavery risks in our operations, and supply chains. We adopt a risk-based approach and consider the perspective of human rights due diligence, which means that we will aim to address the most severe risks to people first. Our modern slavery approach is underpinned by a framework and supported by the RSK AUS Modern Slavery Working Group.

Table 1: Our Modern Slavery Program

Our commitment	Our management systems and controls	Our modern slavery risk response framework
Our policies, framework and standards, responsibilities and accountabilities, stakeholder agreements and industry participation and collaboration.	How we assess our risks, ensuring consistency in the application of our assessments, building capacity and education, engaging suppliers and ongoing monitoring and reporting	Having grievance mechanisms in place to identify, assess and manage risks, put in place processes aimed at remediating harm to people if we identify a modern slavery issue in our operations or supply chains.

## 2. RSK ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

We are a multidisciplinary consulting and technical services group of companies providing specialist environmental, engineering, health, and safety support services. RSK Environment Australia Pty Ltd is headquartered in Sydney, Australia but also operates across countries in the Asia-Pacific regions.

The Reporting Entities covered by this joint Statement are set out in [Annexure 1](#) (together the Group). They include wholly and majority owned entities that meet the definition of 'reporting entity' under the Act. References to 'our' and 'we' in this Statement are references to the reporting Entities. This Statement describes practices that are common to the Reporting Entities and to subsidiary entities owned and/or controlled by the Reporting Entities.

During this reporting period, RSK AUS employed approximately 561 people across our businesses which included full time and permanent part time employees, casual employees, and workforce contractors. Group employees are employed under a relevant agreement and/or individual contracts of employment.

Together the Group deliver a broad range of services, primarily within the following sectors:

- Energy and power
- Transport
- Property and construction
- Government
- Manufacturing
- Professional services



- Water
- Waste
- Mining

Diagram 1 RSK Group Australia structure

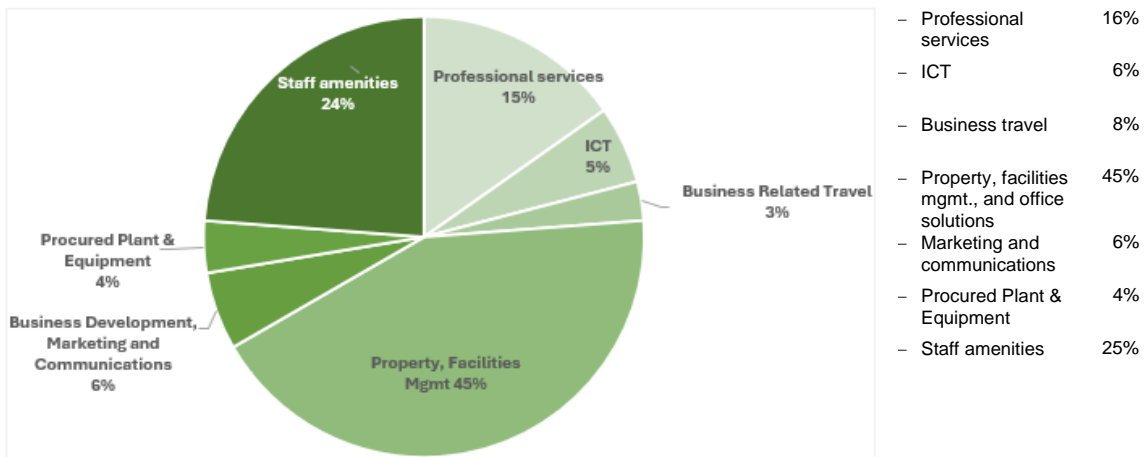


## 2.1. Our Supply chain

Our supply chain includes suppliers operating in multiple geographies across different products and services. Corporate Procurement refers to external spend supporting our operations.

Group procurement includes 1,113 suppliers and \$13.3m spend. During the reporting period, our main spend categories for Corporate Procurement included:

Diagram 2 Group Procurement FY23





### 3. THE RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS

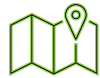
We recognise slavery and human trafficking are significant human rights issues and are committed to taking all reasonable and practicable steps such that there is no slavery or human trafficking in our Group and supply chains. Our commitment to the protection of human rights is embedded in our Ethics Code and our Sustainability Route Map.

#### 3.1. How we identify modern slavery risks in our operations

The risk of modern slavery in our direct workforce is considered low due to processes in place for employee onboarding and ongoing mandatory training modules for employees, covering Group values, policies, and standards.

#### 3.2. How we identify modern slavery risks in our supply chain

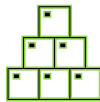
RSK AUS approach to identifying inherent modern slavery risks in our supply chains is based on three key indicators:



**Geographic risk indicators** Some countries are reported to have a higher prevalence of modern slavery. Our supplier risk ratings are based on the Walk Free Global Slavery Index.



**Product and service risk indicators** Some products and services have a higher prevalence of modern slavery because of how they are manufactured, how core components are sourced, or the workforce profile utilised to deliver the service or develop the product<sup>1</sup>.



**Supplier tiering** Where practicable, we consider supplier tiering and the location of where our supplier's supplier operates to improve the accuracy of our risk assessments. We acknowledge that assessing modern slavery risk throughout the entire supply chain remains a challenge and focus.

Source: Walk Free Global Slavery Index: [Global Slavery Index | Walk Free](#)

#### 3.3. Our modern slavery at risk categories

Six risk areas (not in priority order) have been identified; each is described below and includes the potential modern slavery risk:

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<sup>1</sup> Walk Free Global Slavery Index [Methodology | Walk Free](#)

Table 2 Group Modern Slavery risk categories

Potential Risk Category	Description	Potential modern slavery risk within the context of the 'continuum of involvement'
<b>Information and Communication Technology (ICT)</b>	Technology services are core to our operations and include hardware, software, and various project delivery and cloud services.	There is potential to be directly linked to modern slavery where systemic labour issues related to this industry persist. Suppliers may operate in countries that are associated with a higher risk of forced or child labour and rely disproportionately on low skilled or migrant workers.
<b>Marketing and Communication</b>	These services include promotional items and printing services, sponsorship, and events, and mail and courier services. While these products and services are sourced directly from Australian suppliers, we recognise that our suppliers may source their products from overseas locations.	There is potential of contributing to or being directly linked to modern slavery where our suppliers engage with suppliers located in high-risk locations overseas. The risk increases where there is no visibility over these supply chains, where low skilled workers are utilised and/or where there is excessive or persistent pressure to meet unreasonable deadlines.
<b>Travel and Accommodation</b>	We utilise services in relation to our business activities in the areas of accommodation, and air and ground transportation.	There is potential to be directly linked to modern slavery where low skilled or migrant workers undertake this work and there is limited visibility over management practices which can lead to situations of underpayment of wages, excessive working hours, and other forms of exploitation.
<b>Property, Facilities Management and Office Solutions</b>	We engage with suppliers that provide facility management services (including office cleaning), construction, office supplies, catering and security.	There is potential to be directly linked to modern slavery due to several contributing factors such as the reliance on migrant labour, and often low skilled/manual nature of the work performed. The risk is heightened where work is performed out of regular business hours.
<b>Contingent Labour</b>	Contract workers are a critical component of our workforce.	There is potential to be directly linked to modern slavery through recruitment practices. The risk is heightened where recruited workers are from migrant, lower socio-economic, culturally, and linguistically diverse backgrounds and may experience systemic issues, such as underpayment or withholding of wages, and excessive working.
<b>Plant and Equipment</b>	We engage with suppliers that provide plant and equipment for the	There is potential of contributing to or being directly linked to modern



Potential Risk Category	Description	Potential modern slavery risk within the context of the 'continuum of involvement'
	purposes of delivering mining and infrastructure projects.	slavery where our suppliers engage with suppliers located in high-risk locations overseas. The risk increases where there is no visibility over these supply chains, where low skilled workers are utilised and/or where there is excessive or persistent pressure to meet unreasonable deadlines.



## **4. MODERN SLAVERY RISK RESPONSE FRAMEWORK**

### **4.1. Purpose**

RSK AUS is committed to playing its part in eradicating modern slavery. Modern slavery describes situations where intimidation, threats or deception are used to exploit people and undermine their freedom. This includes people trafficking, slavery or servitude, forced labour, forced work to pay a debt (debt bondage), forced marriage, the worst forms of child labour and deceptive recruiting. As part of our Human Rights Policy, teams are expected to consider the risk of modern slavery in their direct operations and supply chains. Material risks are to be included in the team risk register for ongoing management and tracking. As we assess and address modern slavery risks within our direct operations and supply chain, situations that foster modern slavery or suspected situations of modern slavery may be identified. This framework sets out the process to assist in responding to actual or suspected incidents of modern slavery in our direct operations and supply chains, or a change in circumstances which may result in a materially increased risk of modern slavery occurring in our direct operations or supply chains.

This framework should be considered in conjunction with other Group policies and procedures, including our Anti-Slavery and Human Trafficking Policy.

### **4.2. Raising initial concerns**

Initial concerns are raised with Management who will consult with the divisional Compliance, Risk and Legal team to align on approach. If an incident of modern slavery has been identified and validated then the Response Framework applies, and the Group Executive will be notified.

### **4.3. Response framework objectives**

The objectives of the response framework are to:

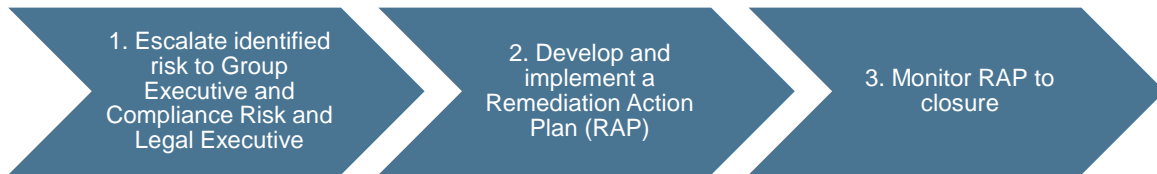
- Protect the health and safety of workers in both our direct operations and supply chain.
- Educate our people and our suppliers on Modern Slavery risk and appropriate means to respond to concerns about the occurrence of modern slavery.
- Support our people and our suppliers to respond and remediate, if appropriate, identified concerns in respect of modern slavery in our direct operations and supply chains effectively and efficiently.
- Elevate the issue internally and ensure Group Executive, and Compliance, Risk and Legal Executive are aligned on the response strategy and a remediation action plan developed.



## 4.4. Response process

Our response process involves escalating identified issues to the Group Executive, and the Compliance, Risk and Legal Executive to validate identified issues, agree on remediation action plans (in accordance statutory requirements which may require reporting to appropriate Government agencies) and monitor agreed plans to closure.

Diagram 3: Modern Slavery Response Process



## 4.5. Our approach to responding and remediation

We recognise that actions taken to address modern slavery risks need to be in the best interests of the potential victim or victims and Rabobank's response needs to be tailored to each individual situation. Our approach to responding to and remediating incidents of modern slavery considers the principles set out below.

### 4.5.1. Safeguarding victims

Victims of modern slavery are often very vulnerable people. We recognise that our response must acknowledge that vulnerability and ensure appropriate steps are taken to protect victims and not unnecessarily further disadvantage them through the remediation actions taken.

### 4.5.2. Respect confidentiality

Where a potential incidence of modern slavery is identified, confidentiality should be maintained if possible, considering the need to safeguard the victim and to ensure allegations can be properly investigated.

### 4.5.3. Gather and secure information

If there is a concern about modern slavery in our operations and supply chains, relevant information should be obtained and retained for the concern to be properly investigated. This should be done in consultation with Compliance, Risk and Legal. Consideration should be given to whether it is appropriate to use any contractual rights, including audit rights, to obtain this information. Privacy and data security should be maintained and respected.

### 4.5.4. Reference to appropriate experts and authorities

We recognise that RSK may not always be best placed to directly respond to incidents of modern slavery in our operations or supply chains. Depending upon the circumstances in which the modern slavery occurred, it may be appropriate to refer concerns to law enforcement or other authorities, or to work with non-governmental bodies to provide guidance as to our response on the remediation process.



#### **4.5.5. Workplace actions**

Our response to incidents of modern slavery needs to be flexible and consider the circumstances in which modern slavery occurred. Response options which may be considered by RSK include:

- Developing and implementing an action plan to address risk factors or issues identified and monitoring the status of action plans to closure.
- Where necessary, consultation with our suppliers, relevant authorities or other experts and may include supplier education and direct support for victims.

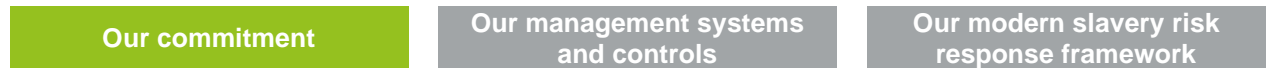
#### **4.6. Whistleblowing Policy**

If for any reason, RSK personnel do not want to approach the Group Executive. RSK has a Whistleblowing Policy. Any concerns raised under our Whistleblowing Policy are reviewed in an impartial, fair, and objective manner and anyone who makes a report may do so without fear of reprisal, intimidation, or disadvantage. Concerns can also be raised anonymously through RSK Whistleblowing.



## 5. ACTIONS TAKEN TO ASSESS, ADDRESS AND MANAGE MODERN SLAVERY RISKS

Actions taken in FY23 to assess and address modern slavery risks in our operations and supply chains are structured based on our three-pillar framework as described in Table 1 and detailed in the following paragraphs.



### 5.1. Key policies

We take ethical and responsible decision-making seriously, and we expect our people, suppliers, and business partners to do the same. RSK AUS has the following policies in place to help safeguard our modern slavery approach.

Table 3 Key policies relevant to modern slavery

Policy	Description
<b>Ethics Code</b>	Outlines the values and behaviours expected at RSK AUS and provides guidance to support people with their decision-making and to 'speak up' when something is not right
<b>Supplier Standards</b>	Outlines the behaviours that RSK AUS intends to demonstrate in our interactions with suppliers and clarifies our expectations of suppliers in relation to modern slavery, child labour, worker entitlements, freedom of association, and the humane treatment of workers.
<b>Corporate Responsibility and Sustainability Policy</b>	This Policy outlines the fundamental commitment to environmental, social and corporate governance (ESG) across the Group.
<b>Group Procurement Strategy</b>	Outlines the principles and requirements for RSK AUS Procurement activities.
<b>Whistleblowing Policy</b>	Outlines the rights and responsibilities of people involved in a whistleblowing report, including how people can report wrongdoing safely and confidentially without fear of retaliation.
<b>Anti-Bribery and Corruption Policy</b>	Outlines RSK AUS requirements in relation to managing bribery and corruption risks and supports our purpose and strategy by prohibiting bribery and corruption and providing clear requirements on the management of such risks.
<b>Group Anti-Slavery &amp; Human Trafficking Policy</b>	Outlines RSK AUS position in respect of slavery and human trafficking and, together with mandatory training, helps employees and anyone acting for or on behalf of RSK AUS to understand what modern slavery is and what our responsibilities are in respect of the prevention, detection and reporting of modern slavery in our business and supply chains.



## 5.2. Improved representation of the Modern Slavery Working Group

The role of the working group is to mitigate modern slavery risk across the Group in a consistent and strategic manner with representatives from:

- Group companies
- Human Resources
- Compliance, Risk and Legal; and
- Finance

As part of our desire to continually improve, the Modern Slavery Working Group will be expanded during the 23/24 financial year to include a key stakeholder from an accredited Non-Government Organisation (NGO). This will deliver further insight into identifying potential risks for modern slavery and provide rigour around supplier accountability with industry partners.

Our commitment

Our management systems and controls

Our modern slavery risk response framework

## 5.3. In our organisation

### 5.3.1. Monitoring risks in our workforce

All Group employees are recruited in accordance with clear HR procedures designed to comply with local legislation, including checks for eligibility to work in Australia or the relevant host country, references, proof of identification (drivers licence or passport) and bank details. This demonstrates each person is acting in his or her own right. We also comply with national minimum and living wage requirements.

In this reporting period 115 people were successfully recruited with 100% compliance to the Group recruitment and selection criteria.

### 5.3.2. Upskilling our people

All employees are required to complete the Group induction which includes a specific mandatory e-learning modules in respect of combatting modern slavery and human trafficking, which they are required to refresh on an annual basis. All employees undertaking the training are assessed on their understanding with questions throughout the course, which need to be completed to successfully pass the course.

The online training included:

- What modern slavery is and how it is defined.
- Common indicators of modern slavery; and
- RSK Group responses to modern slavery.

As of 30 June 2023, 98% of training was complete.

### 5.3.3. Embedding modern slavery clauses in employment contracts

All Group employment contract agreements were uplifted. In this reporting period 115 contracts were uplifted to include clauses relating to modern slavery.



## 5.4. In our supply chains

### 5.4.1. Mergers and acquisitions

RSK Environment Australia Pty Ltd has continued its rapid growth strategy during FY23, both organically and through the acquisition of complementing businesses. As part of the new business integration process, we are continually reviewing and aligning our procurement processes across RSK AUS such that they are fit for purpose in our growing organisation and developed in line with current good/best practice to prevent slavery and human trafficking taking place anywhere in our supply chains.

This included supplier surveys, site visits, and third-party audits to identify and assess potential modern slavery risks. Identified high-risk suppliers were subjected to further scrutiny and corrective action plans were implemented where necessary.

In this reporting period 2 companies were assessed and completed the RSK AUS onboarding process, with 100% compliance achieved relating to modern slavery.

### 5.4.2. Supplier assessment

Our Group standard purchasing terms make specific reference to the modern slavery and human trafficking legislation. Supplier assessments are a key performance indicator (KPI) which are reported quarterly to the RSK Australia Board.

In this reporting period 10 companies were assessed with 100% compliance achieved relating to compliance with RSKs modern slavery requirements.

Our commitment

Our management systems  
and controls

Our modern slavery risk  
response framework

## 5.5. Group Whistleblowing mechanism

The Group's independent Whistleblowing mechanism is managed by a third-party provider. Once an issue is raised it is allocated for investigation in line with the Group Whistleblowing Policy. This Whistleblowing mechanism allows our people and suppliers' workers to report alleged misconduct in a confidential manner and helps to facilitate the protection of the identity of Whistleblowers if they wish to remain anonymous. In FY23, there were no reported instances of modern slavery through our grievance mechanism.

## 5.6. Response framework

In this reporting period the Group Modern Slavery Risk Response Framework was introduced. The assessment of the successful implementation will be included in the next reporting period.

The framework is in this document: [Modern Slavery Risk Response Framework](#)











## 6. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

We are committed to a process of continuous improvement related to modern slavery actions and the measures used to evaluate the effectiveness of those actions.

Assessing the effectiveness of our actions is a key component of understanding the impacts of our business activities, and whether our modern slavery identification and mitigation processes are addressing our modern slavery risks. We are committed to continuing to expand our approach to effectiveness.

Table 4: Assessment of actions

Modern slavery framework	Element	How actions contribute to assessing effectiveness
1. Our commitment	 Policies and procedures	Policies and procedures have been reviewed and uplifted to reflect ESG considerations. Policies and procedures are the foundations of effecting modern slavery measures across our organisation and are therefore, considered an effective instrument.
	 Governance	An effective governance structure and mechanism to measure performance, ensure the right stakeholders are involved in risk identification and management, and support a cycle of continuous input and improvement.
	 Collaboration with peer organisations and industry bodies	Collaboration deepens understanding of industry trends, organisational challenges, approaches to addressing modern slavery and sharing learnings.
2. Our commitment	 Mergers and acquisitions	Robust due diligence processes, during acquisition, ensures alignment with the RSK modern slavery requirements and expectations. This is in place and working well.
	 Training and awareness	Modern slavery training allows us to increase awareness and knowledge of where modern slavery risks may arise and encourage reporting of these risks.
	 Supplier assessments	Continued monitoring and review of the supply chain will ensure our continued compliance to our legal and moral obligations relating to modern slavery.
	 Assessing risks during recruitment and selection	Monitoring will continue in FY24 for any potential risks relating to modern slavery during recruitment and selection of personnel.
3. Modern slavery response framework	 Grievance mechanism reporting and remediation action plans	With the introduction of the Modern slavery response framework this will encourage and support our people in identification and reporting of issues relating to modern slavery. RSK will continue with embedding the framework across the organisation in FY24.



Effective

Continue in FY24



## 7. OUR CONSULTATION

This Statement was circulated to the Group Leadership Team (LT) and the Board of Directors for review and approval.

As part of the consultation process, members of the LT, who are collectively responsible for each of the Reporting Entities (and all entities owned or controlled by those Reporting Entities), were engaged to provide their review and feedback.

Following LT endorsement, the Statement was approved by the Board of Directors on behalf of the other RSK Group Companies.

## 8. LOOKING FORWARD

RSK AUS intends to seek opportunities for collaboration with our people, suppliers, peers, industry associations and communities, and raise awareness of the risks of modern slavery. We also acknowledge the statutory review of the Act, and the recommendations being considered by the Government.

Our modern slavery program includes the following priorities:

- Continue to deliver capability training to create awareness and uplift our understanding of modern slavery.
- Strengthen oversight of modern slavery risk into existing governance forums, particularly ESG forums.
- Continue to engage with our supplier base through survey and assessment using the Group supplier assessment criteria.
- Continue with imbedding of the Modern Slavery Response Framework through RSK Group Companies

I am pleased to present RSK Environment Australia Pty Ltd First Joint Modern Slavery Statement (Statement), made in accordance with the Modern Slavery Act 2018 (Cth), for the financial year ending 30 June 2023 (Reporting Period).

A handwritten signature in black ink, appearing to read 'Mark Haydock'.

Mark Haydock  
Managing Director  
RSK Environment Australia Pty Ltd

Date: 16/10/2023



## ANNEXURE 1 Reporting Entities

Reporting Entity
RSK Environment Australia [ACN 652 882 730]
Pensar Construction Group Pty Ltd [ACN 159 082 498]