

Brunel

Modern Slavery Statement



2024

'We are committed to endorsing the ILO principle of effectively abolishing child labour, which entails ensuring that every child has the opportunity for full physical and mental development. In Australia, our local entity has established enterprise agreements with various industries and workers' unions under the Fair Work Act framework.'

These agreements cover aspects such as salary rates, employment conditions, consultation processes, dispute resolution procedures, and authorised wage deductions, all of which are part of project-specific HR management plans. Given Brunel's core focus on technical graduates and experienced professionals, the risk of violating the principle of child labour within our business is extremely minimal. Our dedication to ethical practices remains steadfast.'

Organisational structure and supply chains

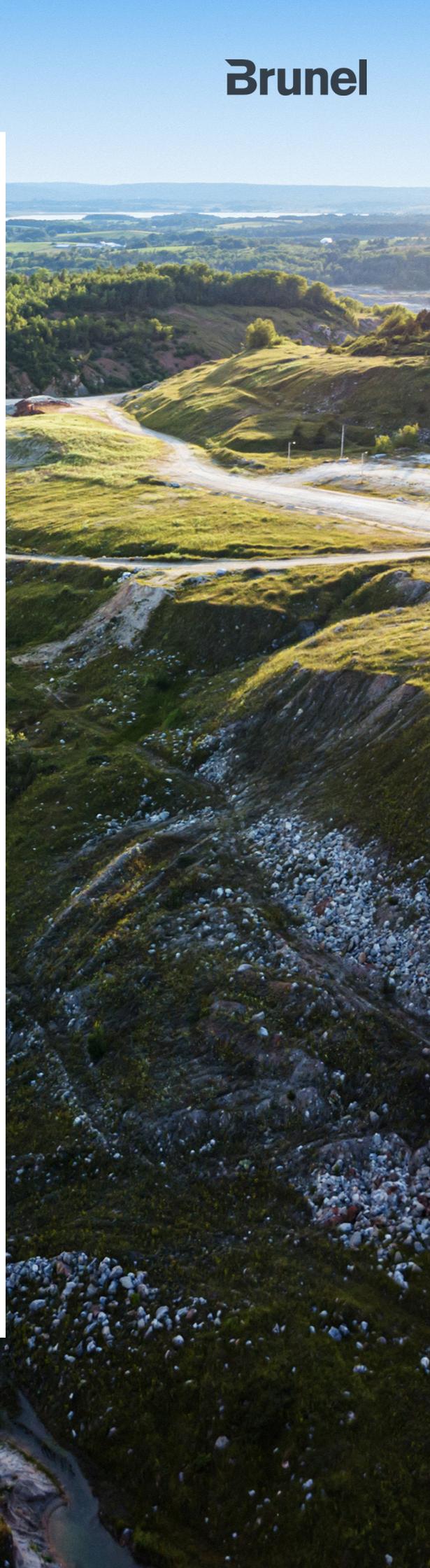
Brunel Australia Holdings Pty Ltd is 100% owned by Brunel Energy Holdings B.V. (Netherlands), which in turn is wholly owned by Brunel International N.V. (Netherlands), a company listed on the Amsterdam Euronext exchange. Brunel is an international recruitment and staffing business established in 1975 in the Netherlands. Since our first placement of an engineer, we have grown our presence to more than 40 countries around the world. We predominantly service the Renewable Energy, Conventional Energy, Life Sciences, Mining, Infrastructure, and Automotive sectors. Brunel's operations span these industries across six continents, providing recruitment and staffing solutions to ensure the best talent for every project.

Brunel's supply chains are extensive and varied, reflecting the diverse range of sectors we operate in. Our suppliers range from IT service providers and office supply companies to specialised contractors and other recruitment agencies. We also engage in the provision of personal protective equipment (PPE) and other materials essential for ensuring the safety and effectiveness of our workforce in various industries. This vast network requires robust reporting mechanisms to monitor and manage the risks associated with modern slavery and ensuring ethical business practices throughout our supply chain.

[You can read more about Brunel and our services at brunel.net.](https://www.brunel.net)

In line with Section 16 of the Australian Modern Slavery Act 2018 ("The Act"), this statement outlines Brunel's approach to tackling modern slavery for the financial year ending the 31st of December 2023. This statement covers Brunel Australia Holdings Pty Ltd and all its Australian subsidiary entities (Brunel) as listed above. Brunel's policies and procedures cover all the Australian entities listed under this statement, and the endorsement from the Directors covers all the below entities without need for further ratification or consultation.

- Brunel Energy Pty Ltd
- SES Labour Solutions Pty Ltd t/a Brunel Mining
- SESLS Industrial Pty Ltd
- Brunel Construction and Maintenance Services Pty Ltd
- Brunel Technical Services Pty Ltd



Our core values underpin everything we do

Locally, we have implemented our own humanocracy charter that further develops on our passion for people - creating an organisation that is amazing as its people. With our core values in mind, we fully endorse the introduction of the Australian Modern Slavery Act 2018 (Cth). We are against all forms of slavery across our business and will strive to ensure any risk of it occurring within supply chain is eliminated.



Tania Sinibaldi
Managing Director of Operations
Australasia & Americas

Our commitment

At the group level, we adhere to the eight fundamental human rights identified by the International Labour Organisation (ILO) and enshrined in the ILO conventions. Brunel fully endorses all the fundamental ILO conventions, integrating human rights as a core element of our corporate culture. Instead of treating human rights as an isolated issue, Brunel embeds compliance within various policies, including the code of conduct, equal opportunity policy, HSE policy, fitness for work policy, privacy policy, and modern slavery policy. These policies are readily accessible on our intranet and in our employee handbook.

We are committed to upholding fundamental human rights and eradicating modern slavery in all its forms. Our corporate values—entrepreneurship, integrity, results-driven, and a passion for people—guide everything we do. We recognise the importance of standing by these values to safeguard our reputation and promote growth in an equitable and sustainable way. Brunel acknowledges its obligation to submit its modern slavery statement within six months of the end of each reporting period.

Risk assessment

Brunel employs a detailed risk assessment methodology to identify areas within our supply chains where there is a risk of modern slavery. This involves evaluating both internal operations and external suppliers to pinpoint high-risk areas. For instance, during the reporting period, we focused on specific sectors such as garment supply, IT services, and visa and immigration management.

Our assessment process includes a comprehensive review of supplier practices and their adherence to our code of conduct, which strictly prohibits forced labour, child labour, modern slavery, or any labour that violates ILO conventions. We utilise a self-developed risk matrix and gap analysis to monitor potential risks and identify any areas that require additional scrutiny or action.

Due diligence processes

Brunel has developed comprehensive due diligence systems to identify, mitigate, and prevent modern slavery within our business and supply chain. These processes include:

Supplier questionnaire development: We created a supplier questionnaire to identify areas in Brunel's supply chain that are susceptible to modern slavery.

Targeted supplier assessments: We distribute this questionnaire to suppliers identified as 'high risk', including PPE suppliers, cleaning services, recruitment partners, IT services companies and travel partners.

Risk matrix and gap analysis: We utilise our self-developed matrix to analyse gaps where modern slavery risks have been identified. For instance, if a supplier lacks a modern slavery policy or statement, we monitor these cases to track the increased potential for modern slavery or actual instances of it.

Staff communication and training: We utilise our RCSA membership and its resources to educate staff about modern slavery. This includes training materials and webinars made available to staff.

Annual modern slavery training: All staff are required to complete compulsory modern slavery training annually. This training enhances their knowledge of modern slavery and their ability to identify potential risk areas.

Supplier relationships and contracts

Brunel's approach to engaging with suppliers is centred on upholding the highest standards of ethical conduct and legal compliance, aligned with our core values. Our Supplier Code of Conduct sets clear expectations for all current and prospective suppliers, ensuring adherence to the principles of the Modern Slavery Act 2018 (Cth) and the promotion of fair, sustainable and responsible business practices.

Suppliers must agree to these standards, some of which are captured below, to establish and maintain a working relationship with Brunel:

Governance and ethics: Suppliers are required to comply with all relevant legal and regulatory requirements in all areas of their business and operations. This includes adhering to ethical practices and upholding the highest standards of corporate governance.

Modern slavery: Suppliers must operate in accordance with the Modern Slavery Act 2018 (Cth) where applicable, and must reject all forms of modern slavery, including forced labour, human trafficking, and any practices that exploit individuals.

Health, safety & environment: Suppliers must comply with all applicable laws and regulations regarding working conditions and environmental protection. They must ensure that workers are provided with a safe and healthy work environment, adhering to all relevant occupational health and safety standards.

Harassment, discrimination & bullying: Neither Brunel's employees nor our suppliers should be exposed to any behaviour or sequence of behaviours that unfairly offend, humiliate, intimidate, belittle, undermine, scare, exclude, or embarrass anyone it is directed at, or anyone who sees or overhears it. This includes a strict prohibition against any form of discrimination or bullying.

Anti-bribery & corruption: Brunel maintains a zero-tolerance approach to bribery and corruption. Suppliers are expected to act legally, fairly, and with integrity in all business dealings, adhering to anti-bribery and anti-corruption laws and policies.

In addition to the Supplier Code of Conduct, Brunel's standard terms of business with clients include contractual commitments to abide by all applicable laws and regulations. These terms explicitly require suppliers to:

Provide a safe working environment: Suppliers must ensure a safe working environment for contract personnel, including reasonably practicable interventions to minimise the likelihood of sexual harassment or assault while on assignment with the client.

Comply with health and safety laws: Suppliers must comply with all applicable occupational health and safety and environmental laws, as well as all relevant industry-specific codes, guidelines, and standards relevant to occupational health and safety.

Through these comprehensive policies and contractual commitments, Brunel ensures that all suppliers and business partners operate within a framework that prioritises human rights, safety, ethical conduct and compliance with legal standards. This approach supports our broader efforts to create a fair, transparent and just supply chain, consistent with Brunel's corporate values and commitment to sustainability and social responsibility.

Training and capacity building

Brunel is committed to training employees and raising awareness about modern slavery issues. Our efforts include:

Induction training: All new employees receive training on modern slavery risks as part of their induction process.

Annual refresher courses: Compulsory annual modern slavery training for all staff to ensure they remain informed about current issues, trends and legislative developments.

Utilisation of external resources: We leverage resources from our RCSA membership to provide comprehensive training materials and webinars.

Internal communication: Regular updates and communications to staff about modern slavery risks, policies and procedures via our internal learning management system, 'BeSmart.'

Effectiveness and monitoring

We regularly review and refine the actions and processes we have implemented to combat modern slavery. Methods used to monitor and measure effectiveness include:

Procurement and supply chain: Evaluating our supplier assessment questionnaire responses to ensure compliance and identify potential risks.

Governance and due diligence framework: Continuous review and updating of our Modern Slavery Policy to reflect the latest practices and legislative changes.

Internal training methodology: Annual reviews and updates to the training material for internal staff to ensure it includes the latest statistics, new legislative developments and additional information on our responsibilities.

For suppliers identified as high risk, we mandate the completion of our modern slavery assessment questionnaire as a condition for doing business with Brunel. We have adopted a strict stance on this requirement and are prepared to terminate contracts with non-compliant suppliers. To date, no supplier contracts have been terminated due to non-compliance with this requirement, indicating the effectiveness of our strategy. Responses have revealed a low risk of modern slavery within our supply chains. Where a high risk has been identified, we have been satisfied with the additional answers to our questions where we felt no further investigation was required.



Reporting and grievance mechanisms

Brunel has established robust reporting mechanisms for instances of modern slavery. Employees and external stakeholders can raise concerns or report suspicions of modern slavery through:

Whistleblowing 'SpeakUp' line: An anonymous hotline for reporting concerns, including those related to modern slavery, which is reported directly to Brunel's Head of Legal.

Grievance handling policy: A structured policy for addressing grievances related to modern slavery, ensuring thorough investigation and appropriate action.

These mechanisms ensure that all reports of modern slavery are taken seriously and addressed promptly, maintaining the integrity and effectiveness of our anti-slavery initiatives.

'We strictly adhere to labour standards and prohibit forced labour, child labour, modern slavery, or any labour that violates ILO conventions. Our code of conduct emphasises this commitment, and we are continuously improving our efforts to prevent forced labour.'

Brunel Annual Report 2023

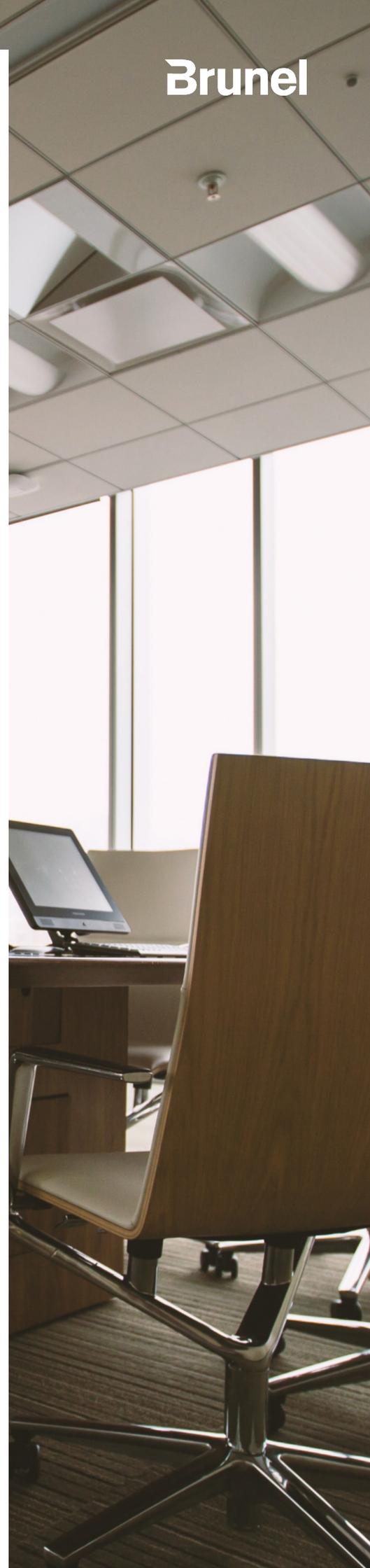
Collaboration and partnerships

Brunel collaborates with external organisations and industry bodies to strengthen our efforts against modern slavery. Notable collaborations include:

RCSA Corporate Membership: As an RCSA Corporate Member, we adhere to the RCSA Code for Professional Conduct, which includes commitments to safeguard work seekers from exploitation and conduct business ethically.

Industry Peers: Engaging with industry peers to share best practices and develop collective solutions to combat modern slavery.

Through these collaborations, Brunel demonstrates its commitment to collective action and continuous improvement in addressing modern slavery risks.





Future actions and targets

Brunel remains committed to advancing its modern slavery prevention efforts in the year ahead. Key initiatives for 2024 include:

Continued collaboration: Engage with industry peers and stakeholders to share best practices and develop collective solutions to modern slavery.

Review and update Supplier Code of Conduct: Ensure all suppliers agree to the updated code to continue their business relationship with Brunel.

Supply chain transparency: Implement measures to increase transparency and accountability within the supply chain, including supplier audits and disclosure requirements.

This Modern Slavery Statement has been prepared in accordance with the Modern Slavery Act (Cth) 2018 and has been approved by the Board of Directors of Brunel Australia Holdings Pty Ltd on the 30th of May 2024.



Tania Sinibaldi
Managing Director, Australasia
Brunel

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