CSE Australia

*a **CSE** global company*

2021 Modern Slavery Annual Statement

For the period ending December 31, 2021

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1. Introduction

This is our second Modern Slavery Statement, and we are pleased to provide an update on how we have performed and progressed on our Modern Slavery journey.

This Statement is made by CSE-Global (Australia) Pty Ltd (ABN 85 109 958 090) and each of its wholly owned subsidiaries (together CSE) under the Modern Slavery Act 2018 (Cth) (Act) for the financial year ending December 31, 2021. (CSE's financial reporting being January to December each year.)

This statement details the steps we have taken to assess modern slavery risks within our business and supply chains and the actions implemented during FY 2021.

The Statement covers CSE Global (Australia) Pty Ltd (the holding company) and the following business entities:

CSE Crosscom Pty Ltd

CSE Uniserve Pty Ltd

CSE New Zealand Limited

RCS Telecommunications Pty Ltd

2. About CSE

In Australia and New Zealand (ANZ), we have offices located in WA, NT, NSW, VIC, TAS, QLD, SA, Auckland, Wellington, plus regional offices throughout some Australian States.

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

3. Our Structure and Operations

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

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

98% of our employees are on full-time/part-time permanent employment arrangements with the balance of 2% being casual or visa-sponsored employees.

The tables below represent our employees by Business Unit and employment category.

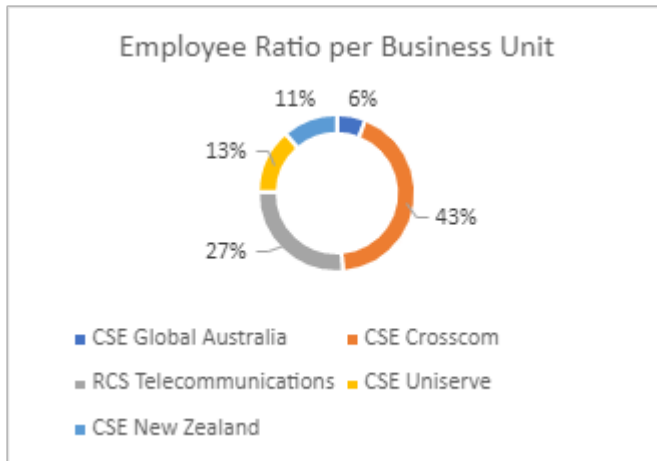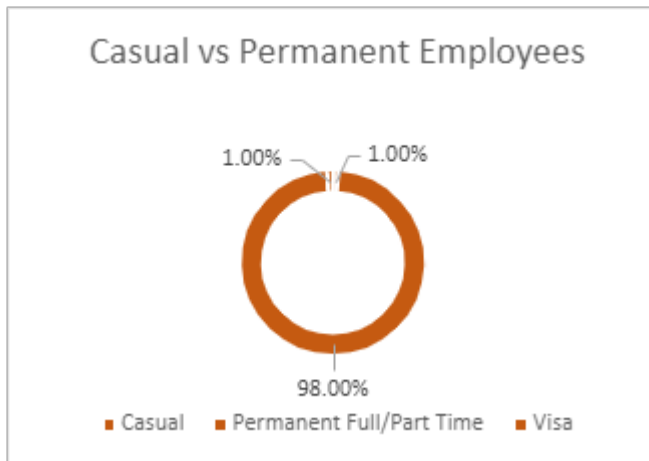**Figure 1 - Employee Ratio broken up by Business Unit as at 31st December 2021**

Figure 2 – Casual/Visa vs Permanent Employees as at 31st December 2021

3.1.   Governance

CSE are 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.

During 2020, 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 such as Head of People and Culture, HSE Manager, Quality and Business Improvements Manager, IT Manager, and Group Commercial Manager. During 2020, Modern Slavery risk management was incorporated into the function of the BCPG. During 2021, the BCPG met twice at six monthly intervals with the topic of Modern Slavery covered under the agenda. Matters such as policy, supply chain

due diligence and internal employee training and awareness were agenda items that were covered and discussed.

4. Our Policies

At the start of our Modern Slavery journey, CSE reviewed policies that would encompass the way we treat our people and engage with our supply chain with the view to introduce statements and actions that would mitigate the risks of modern slavery and human rights abuse within our organisation.

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

1. Implementation of a **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.
2. Our **Bullying, Harassment and Discrimination Policy** ensures our employees can attend work in an environment that is positive, supportive, and safe.
3. Our **Recruitment Procedure** includes:
    a. A minimum age policy in line with the *United Nations Guiding Principles on Business and Human Right*s.
    b. Working hours are applicable with local laws.
    c. Prevents us from withholding original documents such as passports and driver's licenses.
    d. Only engaging with recruitment agencies that have qualified through our due diligence and self-assessment programs.
    e. Standard employment contracts in line with *Fair Work Act (2009).*
4. We have a **Code of Business Ethics Policy** (COBE), which is reviewed annually and distributed to all employees. We require all employees to read the guidelines and complete a COBE declaration every twelve months to identify and declare any possible conflicts of interest. Matters covered include (but are not limited to) fraud, bribery, corruption, and theft.
5. 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.
6. Our **Procurement Manual** ensures that our supply chain due diligence has been conducted on all new suppliers and subcontractors prior to engagement.

5. Taking Actions to Address the Risks

5.1.   Supply Chain

During FY 2020, we implemented our Self-Assessment Questionnaire and Declaration which must be 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. We continued with our supply chain assessments during 2021.

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 2022, 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.

Our Supplier and Subcontractor Agreements include arrangements that require them to comply with the *Modern Slavery Act (2018)*.

In FY 2021 we developed and implemented a Subcontractor Code of Conduct, and during FY 2022 we will be implementing a Supplier Code of Conduct. Both these Codes include facets that would ensure our supply chain are compliant with the *United Nations Guiding Principles of Business and Human Rights*.

5.2. Workforce

As at the end of FY 2021, CSE employed 283 people. Under the management of our People and Culture Team (P&C Team), we ensure we recruit the right people for our business and that we provide the right environment for our people. The P&C 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.

The workforce includes a mix of engineers, technicians, management, finance, and administration personnel, as well as apprentices and trainees. In our opinion, 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 prevent any risk of Modern Slavery or human rights abuse.

5.2.1. Training

Our human rights and modern slavery program are dependent on the practical understanding of our people. During 2020, CSE embarked on delivering several training events for our employees. Over the course of FY 2021, CSE continued to deliver Modern Slavery training and included other facets of human rights such as Bullying and Harassment in the workplace.

During 2021, our executive and management teams underwent training to ensure they have a good understanding of the requirements and principles of the *Modern Slavery Act 2018 (Cth)*, and how to support CSE in its endeavors to implement and communicate new and changed policies.

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

5.2.2. 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 business.

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 P&C Team.

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

6. Measuring our Actions

CSE implemented the below table of measures 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 & Assessment

AREA	ACTION	MEASURE
Governance	• Employee training • Policy reviews • Supply chain management and disclosure • Board approval and oversight • Agreements/Contracts • New Supplier and Subcontractor forms	• # Of team trained • Annual review of policies and procedures • Quarterly review of supply chain declarations • Six monthly reports to the CEO of actions to date • All Agreements/Contracts to contain modern slavery commitments. • All new supplier and subcontractor forms to contain modern slavery commitments.
Review	• Internal audits • Supplier self-assessment questionnaire	• Include modern slavery into our internal audit procedure with 100% compliance • Monitor self-assessment questionnaires for 100% compliance
Risk	• Enterprise Risk Register • Supply chain entry	• Annual risk assessment • Review of supply chain onboarding paperwork 100% compliance
Reporting	• Cases raised • Channels used to raise the cases	• Total number of cases reported internal and/or external • Mechanisms used to raise a case (Whistle-blower or open reporting)

7. Next Steps

During FY 2022 we will:

1. Develop and implement a Supplier Code of Conduct;
2. Continue with training and development for our employees; and
3. Continue with supply chain due diligence and self-assessment questionnaire and declaration.

8. Supply Chain Appreciation

CSE would like to take this opportunity to place on record our appreciation of our supply chain in working with us on this important matter. CSE is committed to continue working 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.

9. Approval and Signature

This statement was distributed and approved by the board of CSE-Global (Australia) Pty Ltd on 20th June 2022.

William Roy Rowe
Chief Executive Officer
CSE Global (Australia) Pty Ltd
20th June 2022