

Ausenco Modern Slavery Statement 2022

1.1 Background

The International Labour Organisation (ILO), estimates that more than 40 million people globally are victims of modern slavery. Between 2015 and 2017, it was estimated that there were up to 1,900 victims of modern slavery in Australia. Modern Slavery is defined as including:

- Trafficking in persons

- Slavery

- Servitude

- Forced marriage

- Forced labour

- Debt Bondage

- Child labour

- Deceptive recruiting for labour and services

Ausenco is committed to ensuring it meets its obligations under the *Modern Slavery Act 2018* (Cth) (the Act) and recognises the importance of protecting human rights. Ausenco is dedicated to protecting the rights of all people including its employees, clients, and those within its supply chains by implementing risk mitigation measures to address forms of modern slavery.

1.2 Reporting Entity

This is Ausenco's third year of reporting under the Act. This joint statement is made in respect of Ausenco, and its related bodies corporate as set out in Appendix 1, for the financial year 30 June 2021 to 30 June 2022. This statement was approved by the Board of Directors and the Ausenco Audit and Risk Management Committee (ARMC) in their capacity as the principal governing body of Ausenco Pty Ltd on 30 June 2022.

1.3 Structure and Operations

Ausenco is a global engineering consulting company, with its headquarters located in Brisbane, Australia. Our team is based across 26 offices in 14 countries, with projects in over 80 locations worldwide. Combining our deep technical expertise with a 30-year track record, we deliver innovative, value-add consulting studies, project delivery, asset operations and maintenance solutions to the mining & metals, oil & gas and industrial sectors. We find a better way.

Wherever we operate in the world, we respect the diverse communities and environments.

Respect the community and environment

We prize the abilities, diversity and creativity of our people. The way that we care for our people, as well as develop and encourage their talents, is a key part of our culture – and we do all we can to grow their skills.

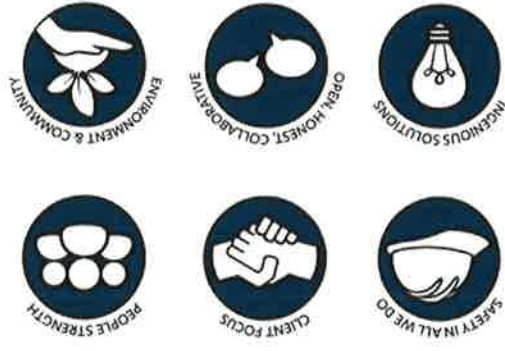
Our people are our strength

We let nothing compromise our safety performance. All around the world, we believe our valued people deserve to return home safely each and every night.

Safety in all we do

We develop trusting relationships with our business partners and clients. Helping them build better businesses and deliver outstanding results means we can do the same.

The client is our focus

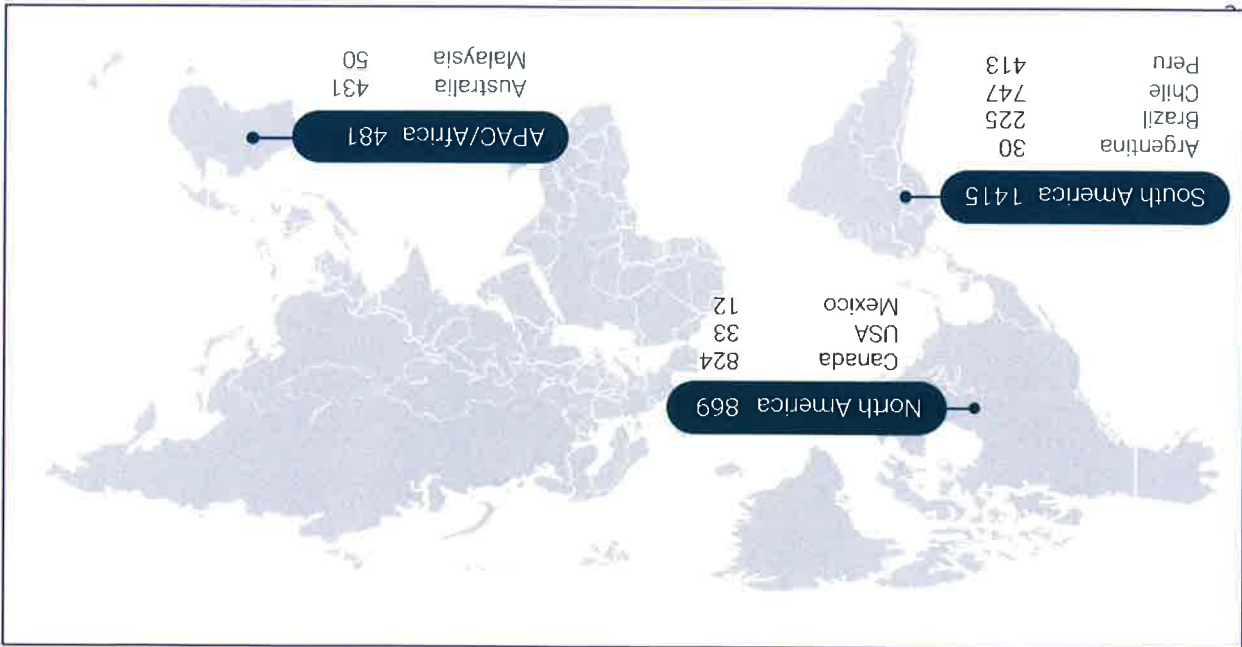


Our core values are the cornerstone of everything we do. They enable us to discover through ingenuity and lead by example.

1.3.1 Our Values

We are also committed to having a positive impact on the world around us. Wherever we work, we strive to collaborate with clients and communities to achieve truly sustainable outcomes in health, safety, the environment and community.

Figure 1.1 People numbers as at June 2022



We understand that our actions leave a lasting impression, and we want to make sure it's a good one for future generations.

We seek ingenious solutions

We encourage our people to be lifetime learners. This nurtures the ingenuity, flexibility and creativity that we need to find solutions and manage change.

We are open, honest and collaborative

We respect the diversity and differences of all our people and various stakeholders, and we support this with straightforward and open communications at all times.

1.4 Our Approach

1.4.1 Supply Chain Risks and Due Diligence

Ausenco continues to review the risks of modern slavery in its supply chain and conduct due diligence assessments of its suppliers. When conducting risk reviews of its supply chains, Ausenco recognises that certain industries, products, and geographic locations have been linked to higher occurrences of modern slavery. These industries include cleaning, certain types of manufacturing, textile production and agriculture. Ausenco's main service offering is engineering consulting services, which are considered to be in the lower risk category. The majority of Ausenco's subcontractors and subconsultants also provide similar specialist engineering consulting services.

According to the Walk Free 2018 Global Slavery Index, the top ten countries with the highest prevalence of modern slavery include North Korea, Eritrea, the Central African Republic, Mauritania, and Pakistan. Although Ausenco does not operate in these high-risk countries, Ausenco does provide Services to clients who own facilities in these regions. Ausenco recognises that as these projects progress, suppliers based in these regions may be engaged. Ausenco will continue to monitor and identify any modern slavery supplier risk by conducting supplier due diligence and incorporating modern slavery assessments into project risk registers.

Ausenco also provides construction and construction management solutions and procurement services to its clients. These specific activities involve the engagement and management of subcontractors who provide construction materials, equipment, and labour. Working in the construction sector has been identified as high risk area for modern slavery. Ausenco recognised the importance of improved visibility in the construction related chains and, during the reporting period has widened its supply chain due diligence processes to include its international operations by undertaking the following:

- Updating its standard prequalification questionnaires utilised by its procurement teams for global projects to include modern slavery compliance provisions.
- Updating its standard subconsultant, subcontractor and independent contractor agreements for its North and South American operations to ensure modern slavery compliance clauses are incorporated.
- Implementation (and revision) of Modern Slavery Questionnaires in the vendor onboarding process in Ausenco's North and South American operations
- Updating of project risk registers to incorporate the monitoring of modern slavery risks in projects.

- Revision of supply and service agreements utilised for global projects, to include modern slavery compliance provisions.
 - Updating of Ausenco's standard invitation to tender (ITT) documents to ensure potential vendors confirm their compliance with the Act.
- Ausenco's prequalification questionnaire, ITT and standard contracts are integrated into Ausenco's Modern Slavery Policy which is available on our website.

1.4.2 Remediation

Workplace Relations

Ausenco operates in numerous countries and as such has a diverse workforce. The company values this diversity and recognises the organisational strength and opportunity for ingenuity that it brings. As such, Ausenco is committed to providing a working environment that is free from discrimination, where people can work together in a productive and professional manner. It is the responsibility of all Ausenco personnel, including employees, contractors and consultants, to ensure that the workplace is free from discrimination. Any form of discrimination by individuals is considered a serious matter and will not be condoned nor tolerated.

Ausenco has remediation processes in place throughout its operations. Ausenco personnel are able to raise concerns regarding labour practices and workplace grievances with their line manager, the People & Performance team or the Ausenco management teams. There is a process for escalation of issues detailed in Ausenco's employment processes and policies which is shared with all new starters and is available on Ausenco's internal document management system

Dispute Resolution

Ausenco's standard contracts include dispute resolution provisions and suppliers are able to voice any concerns with Ausenco personnel and Ausenco management for escalation. Ausenco's standard contracts also require that suppliers comply with Ausenco's Modern Slavery Policy and applicable law. Any contraventions of the Policy can result in termination of the agreement.

Ausenco's Whistleblower Protection Policy

Ausenco's Whistleblower Protection Policy was updated in May 2022 and is available on Ausenco's website and is accessible to all personnel. Ethics awareness presentations are conducted regularly (most recently in May and June 2022). Ethics awareness training includes training in relation to the Whistleblower Protection Policy and the Anonymous Ausenco Whistleblower 'Alertline'.

The Whistleblower Protection Policy aims to:

- help deter wrongdoing and promote integrity.
- outline the protections under Australia's statutory whistleblower protection regime that are available to individuals who disclose actual or suspected wrongdoing; and
- provide information on how Ausenco handles and investigates Whistleblower Disclosures of actual or suspected wrongdoing.

The Whistleblower 'Alertline' is accessible to all personnel globally to enable anonymous reporting of issues or suspected issues. Ausenco supports any person who comes forward to report any infringement or suspected infringement of our policies, including with regard to any Modern Slavery risks in our business. To date, no instances of suspected Modern Slavery have been reported through the Whistleblower 'Alertline' or to Ausenco management directly.

1.4.3 Supplier Evaluation

During Ausenco's reporting period, all new vendors were required to complete Ausenco's Modern Slavery Questionnaire before engagement. Following an assessment of the new vendors:

- 10% of new vendors in the reporting period were located outside of Australia (in the USA and the UK).
- 90% of new vendors in the reporting period were located in Australia and are considered lower risk.
- 40% of the new vendors provided consulting services comprised of recruitment, engineering consulting, wellbeing services and procurement services and are considered low risk.
- The higher risk industries identified included the provision of computer goods, food and beverage and construction materials (timber supplies).
- A total of 25% of the new vendors had human rights or modern slavery policies in place.

Ausenco is expecting a greater number of new vendors to be assessed in the next reporting period once the implementation of the supplier risk evaluation is completed in its international operations.

1.4.4 Employee Awareness

Ausenco conducts employee training to educate its people on Modern Slavery and how modern slavery can permeate a company's supply chain. Ausenco has delivered a global ethics training program (in person and virtually) to all its personnel in May and June 2022, incorporating Modern Slavery awareness. The training program was attended in person or via conference by over 250 personnel across Ausenco's Australian, Malaysian, South American and North American offices. The training module has also been incorporated into Ausenco's Business Ethics E-learning programs and Ausenco's Modern Slavery Policy.

Statements and vendor due diligence documents are available to all Ausenco personnel via the Ausenco website and Ausenco's internal document management system.

1.5 Stakeholder Consultation

During the reporting period covered by this Statement covers, Ausenco engaged and consulted with its related bodies corporate outlined in Appendix 1 and internal stakeholders.

The actions outlined in this Statement were implemented in consultation with Ausenco's North and South American legal teams, Ausenco's global projects group, as well as Ausenco's procurement and vendor authorisation teams.

During the global Ethics awareness training undertaken in June 2022, Ausenco discussed its annual reporting requirements under the Act and provided personnel with relevant materials and updates.

Towards the end of Ausenco's reporting period, the Ausenco ARMC approved the establishment of a global Modern Slavery Committee which will incorporate internal stakeholder teams who are cross-functional and multi-jurisdictional. The Ausenco Modern Slavery Committee will continue to assess the effectiveness of Ausenco's response to modern slavery.

1.6 Looking forward

Ausenco is committed to continually improving our approach in the identification and management of Modern Slavery risks in both our operations and supply chains.

Looking forward, Ausenco will be implementing the following actions to strengthen our response:

- Establishment of a global Modern Slavery committee incorporating key internal stakeholders who will oversee the following tasks:
 - Assisting in aligning any differing processes in procurement and vendor registration across the regions and business lines.
 - Implementation of supply chain risk reviews of the Modern Slavery Questionnaires across multiple jurisdictions.
 - Review of existing policies, processes, and documentation to identify opportunities for improvement.
 - Alignment of Ausenco's Modern slavery response with Ausenco's Sustainability and ESG policies.
 - Undertake regular meetings to discuss areas of continuous improvement in relation to Modern Slavery actions globally.
- Ongoing employee awareness training including translation of Ausenco's e-learning module in multiple languages to complement Ausenco's current annual ethics training program.
- Continuation our supplier risk assessment and due diligence activities in order to further understand any Modern Slavery risks in Ausenco's supply chains.

Appendix 1

Ausenco Entity	Location
Vector Argentina SA	Argentina
Ausenco Management Pty Ltd	Australia
Ausenco Operations Pty Ltd	Australia
Ausenco Services Pty Ltd	Australia
Ausenco Rylson Pty Ltd	Australia
Ausenco Downer JV - Consolidation	Australia
Ausenco Rylson Asset Optimisation Pty Ltd	Australia
Ausenco International Pty Ltd	Australia
Ausenco do Brasil Engenharia Ltda.	Brazil
Ausenco Engineering Canada Inc.	Canada
Hemmera Envirochem Inc.	Canada
Ausenco Engineers Private Limited	India
Ausenco Peru S.A.C	Peru
Ausenco Engineering USA South Inc	USA
Ausenco PSI LLC	USA


MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of Ausenco Pty Ltd as defined by the *Modern Slavery Act 2018 (Cth)* ("the Act") on 30 June 2022.

Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of Ausenco's Audit and Risk Committee as defined by the Act:



Rod Baxter

Non-Executive Director and Chair of the Ausenco Audit and Risk Committee

Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	7
b) Describe the reporting entity's structure, operations and supply chains.	4
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	3
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	3
e) Describe how the reporting entity assesses the effectiveness of these actions.	5
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	5
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	

* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

** You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

1. Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph – a prescribed member or members of the entity.
 2. Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee – that trustee; or (c) if the entity is a corporation sole – the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001* – the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph – a prescribed member of the entity.



Finding a better way,
every day.

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