

Modern Slavery Statement 2021

Brunel Australia Holdings Pty Ltd
ABN: 60 078 544 126

Level 8 / 40 The Esplanade
Perth Western Australia 6000

+61 (8) 9429 560
brunel.com.au

Brunel

Introduction

Australia Holdings Pty Ltd registered office Level 8, 40 The Esplanade, Perth, WA 6000 ('Brunel') and its associated Australian entities including:

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

Brunel Australia Holdings Pty Ltd are 100% owned by Brunel Energy Holdings B.V. (Netherlands) who are 100% owned by Brunel International N.V. (Netherlands) listed on the Amsterdam Euronext exchange. We are international recruitment and staffing business established over 45 years ago in the Netherlands. We have an established presence in more than 40 countries around the world and primarily service the Renewable Energy, Life Sciences, Oil & Gas, Mining, Infrastructure and Automotive sectors.

Operating locally in Australia since 1997, Brunel Australasia has offices in Perth, Brisbane, Sydney, Mackay, Hunter Valley, New Plymouth (NZ) and Port Moresby (PNG). Our local team have placed tens of thousands of workers throughout Australia over the past two decades and combine our local knowledge and experience with the strength, systems and reach of Brunel's international network, to deliver outstanding results for our clients.

Our commitment

This statement addresses Brunel's obligations and compliance in relation to the 'Modern Slavery Act 2018 (Cth)' ('the Act') for financial year ending the 31st of December 2020. It highlights the steps we have taken, and continue to take, to ensure there is no form of modern slavery occurring within the Australian organisation or our supply chains. In everything we do, we follow our firmly rooted company values: entrepreneurship, integrity, results driven and passion for people. Maintaining this reputation is essential to Brunel's continued success.

At the group level, we take into account the rights covering the eight fundamental human rights as International Labour Organisation (ILO) identified and elaborated in the ILO conventions. Brunel endorses all eight fundamental ILO conventions. Human rights is an integral part of Brunel's culture. Instead of managing human rights as a stand-alone issue, Brunel makes specific reference to comply with them in various Brunel policies, such as the code of conduct, equal opportunity policy, HSE policy, fitness for work, privacy policy and modern slavery policy. These policies are available on our intranet and in our employee handbook.

“ Our core values underpin everything we do at Brunel. 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 Australasia

Our framework

Brunel have a suite of policies and procedures in place which assist us in managing human rights and de-risking modern slavery occurring within our business or supply chain:

- **‘Code of Conduct’** detailing equal opportunity, our commitment to diversity and our intolerance to modern slavery, discrimination, harassment and bullying.
- **‘Indigenous Participation & Employment Policy’** stating our commitment to identifying opportunities for the participation and employment of indigenous people and businesses
- **‘Anti-bribery’** and **‘Whistleblowing’** global policies including annual refresher training on how to identify bribery, corruption, and illegal activities in our business and/or supply chain and how to raise any concerns via our whistleblowing ‘SpeakUp’ line.
- **Modern Slavery Policy** which states our commitment to eliminating all forms of slavery in our business and supply chain.

Labour hire licences

During 31st of December 2020 reporting period Brunel has held labour hire licences in the following jurisdictions: Queensland, Victoria and South Australia*.

The objectives of the Australian labour hire licensing schemes are, broadly, to protect workers from exploitation by labour hire providers and their clients (hosts), to improve the transparency and integrity of the labour hire industry, and to promote responsible practices in the industry. Licence holders are required to meet strict fit & proper person and compliance tests as well as regular reporting requirements.

** Requirement for South Australia Labour Hire License was rescinded as Brunel does not provide services to the identified high-risk sectors in the ‘Labour Hire Licencing Act 2017’*

EFFECTIVE ABOLITION OF CHILD LABOUR

“ We endorse the ILO principle of the effective abolition of child labour. This principle means ensuring that every girl and boy has the opportunity to develop physically and mentally to her or his full potential. Its aim is to stop all work by children that jeopardises their education and development. Considering that the business model of Brunel focuses on working with technical graduates and experienced employees, the risk of violating this principle in Brunel’s business is very insignificant. ”

- Brunel Annual Report 2019

RCSA corporate membership

Brunel as a RCSA Corporate Member are bound by the RCSA Code for Professional Conduct which was authorised by the Australian Competition and Consumer Commission in 2019.

Under the Code, Members are accountable to RCSA for meeting the Code’s standards of professional conduct.

Specifically, the Code requires Members to adopt values of personal professionalism and operational integrity which, amongst other things, require Members to:

- i. protect work seekers from exploitation (including forms of modern slavery);
- ii. conduct business in a way that avoids causing or contributing to exploitation through their activities;
- iii. seek to prevent or mitigate risks of exploitation that are linked to their operations or services by their business relationships, even if they have not contributed to those risks.

Exploitation is defined in the Code in the following way:

Exploitation, of one person (the victim) by another person, occurs if the other person’s conduct causes the victim to enter into any of the following conditions:

- i. slavery, or a condition similar to slavery;
- ii. servitude;
- iii. forced labour;
- iv. forced marriage;
- v. debt bondage.

It also includes serious breaches of the Fair Work Act 2009 (Cth), the Employment Relations Act 2000 (NZ) and unconscionable conduct within the meaning of the common law or the Australian Consumer Law.

As an RCSA Member we are required to meet and are responsible for ensuring that our staff meet the standard of professional conduct required by the RCSA Code.

Risks of modern slavery

We recognise that modern slavery has the potential to exist in our operations and supply chain. Our Australia holdings operations and staff are based in Australia which has a low prevalence of modern slavery (Global Slavery Index 2018) and a strong regulatory environment. Our business employs ~70 direct staff within our operations and an additional ~800 contract hire workforce (at any one time) across white-collar and blue-collar roles in the Oil & Gas, Mining, Engineering, Infrastructure and Renewable Energy sectors.

To date we have focussed on what we believe are the most at risk areas of modern slavery occurring within our business and supply chain.

- **Personnel Protective Equipment (PPE) and Garments**

Under some of our contracts with clients, Brunel are required to supply our workers with PPE. We utilise third party suppliers to supply this PPE. Brunel also purchase merchandise (t-shirts, mugs, branded stationary) as part of our marketing materials. We utilise third party suppliers to supply this merchandise. Clothing is often produced in countries with higher risks of modern slavery occurring. Without the appropriate controls in place we could be either directly linked or contributing to modern slavery practices through the services we receive from our third-party suppliers.

- **Cleaning Services**

We utilise cleaning contractors in the offices that we lease across Australia. We recognise that due to the nature of the manual work, being low-skilled and low-paid there is a higher risk that modern slavery could be occurring in the businesses or the supply chain of the cleaning contractors we have contractual agreements in place with.

- **Recruitment, Staffing and Labour Hire Supply**

Brunel directly introduce candidates to our clients. Those candidates selected by our clients are then contracted and paid directly in accordance with the minimum standards set out in the Fair Work Act, Modern Awards or relevant Enterprise Agreements under which the work assignment falls. Brunel do not currently provide staffing solutions to any of the industries identified as high-risk sectors identified in the 'Migrant Workers' Taskforce' report handed down in March 2019. At present our corporate strategy outlines that we will continue to not provide our services to these high-risk sectors. From time to time, Brunel Australia may partner with recruitment firms in countries we do not hold operations or entities within the global group to payroll our workforce placed on assignment in that location.

COVID-19 Impacts

At the beginning of the global pandemic our supply chain (through our third-party suppliers) of PPE (including face masks) and hygiene products (hand sanitisers) across our offices and workforce was affected with delays on orders. Rather than engage new suppliers of PPE, Brunel made the strategic decision to wait on the delivery of PPE for our workforce and remain loyal to our existing suppliers. Brunel engaged local companies for 'Australian made' hand sanitising products in efforts to support the local economy during COVID-19.

Actions taken to managing modern slavery risks

We have (and continue to develop) various due diligence systems to help us; identify, mitigate, and prevent modern slavery occurring in our business or supply chain.

Actions we have put in place include:

- Development of a supplier questionnaire to help identify areas of modern slavery in Brunel's supply chain
- Issue of the supplier questionnaire to our suppliers identified in our categories of high risk – PPE supplier & cleaning services.
- Development of a matrix (gap analysis) of where modern slavery risks have been identified in our supply chain i.e. where a supplier does not have a modern slavery policy or statement
- Staff communication on modern slavery utilising our RCSA membership and the resources they have made available including webinar 'Modern Slavery & Vulnerable Worker Protections' within the training portal.
- Design and deployment of a modern slavery training unit titled 'What is Modern Slavery?' that all staff must complete as part of their induction and then refresh annually.
- Our BeBetter at Brunel global lean program developed to finding better digital solutions, developing our humanocracy charter and understanding our markets better.

AS A CORPORATE CITIZEN

" As a corporate citizen Respect fundamental human rights in the employment market and safeguarding ethical behaviour, it extends to cultivating future generation and giving back to society at large. "

- Brunel Annual Report 2019

Looking forward

Over the next reporting period, Brunel will continue to assess ways to reduce the risks of modern slavery. Some of the key initiatives we plan to put in place include:

- Widen our training to further develop awareness on different forms of modern slavery including forced labour, deceptive, coercive or intimidating practices
- Set up an annual review process with members of senior management
- Develop and publish a supplier code of conduct
- Undertake and assess the ongoing assessment of our supply chain through our supplier questionnaire
- Consult with our industry peers on best practice in helping eliminate modern slavery via our RCSA corporate membership

This Modern Slavery Statement has been approved by Brunel Australia Holdings Pty Ltd board of directors on 29th of April 2021



Tania Sinibaldi
Managing Director – Australasia
Brunel Australia Holdings Pty Ltd