

Seymour Whyte Group Modern Slavery Statement

2024 Financial Year



Introduction

IDENTIFY THE REPORTING ENTITIES

This joint modern slavery statement is made by:

- VINCI Construction Australia Pty Ltd ACN 620 283 132;
- Seymour Whyte Constructions Pty Ltd ACN 105 493 187;
- Seymour Whyte Contractors Pty Ltd ACN 105 493 203; and
- Taylor Rail Australia Pty Ltd ACN 136 182 628

(collectively, **Seymour Whyte**).

Seymour Whyte is a civil contractor that delivers major essential infrastructure projects across Australia. Whilst our core business is in roads and bridges, we also deliver engineering and construction services to the airport, rail, ports and marine, resources and renewable energy, social infrastructure and water sectors.

Seymour Whyte acknowledges the harm caused by modern slavery and is committed to a continuous improvement approach to identifying and addressing the modern slavery risks in our operations and supply chains.

This statement for the 2024 financial year is made pursuant to the *Modern Slavery Act 2018* (Cth). It has been approved by the boards of VINCI Construction Australia Pty Ltd, Seymour Whyte Contractors Pty Ltd and Seymour Whyte Constructions Pty Ltd (the **Boards**) and has been signed by a member of each board.



John Kirkwood

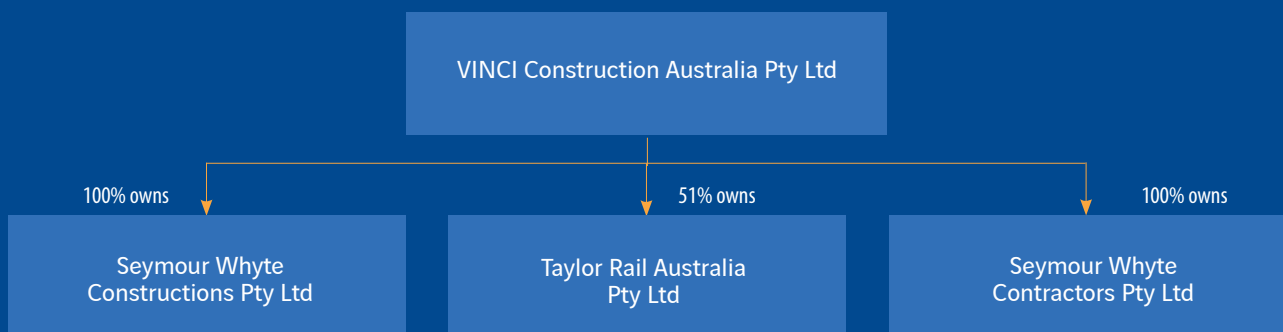
CEO and Managing Director of Seymour Whyte Constructions Pty Ltd and Seymour Whyte Contractors Pty Ltd and Director of VINCI Construction Australia Pty Ltd and Taylor Rail Australia Pty Ltd ACN 136 182 628.



Our structure, operations and supply chain

Structure

Each of the Seymour Whyte reporting entities are private companies. The corporate structure is set out in the figure and table below.



1. VINCI Construction Australia Pty Ltd – holding company.
2. Seymour Whyte Constructions Pty Ltd – trading entity.
3. Seymour Whyte Contractors Pty Ltd.
4. Taylor Rail Australia Pty Ltd.

Seymour Whyte employs over 758 people across Queensland, Western Australia, New South Wales, South Australia and Victoria. Our headquarters are located in Eight Mile Plains, Queensland and we have offices in Sydney, Melbourne, Adelaide and Perth.

The ultimate parent company of Seymour Whyte is VINCI SA (**VINCI**) – a global player in integrated concessions and construction. VINCI employs approximately 280,000 people in more than 120 countries. On 20 August 2024, VINCI Construction Australia Pty Ltd acquired a 51% interest in Taylor Rail Australia Pty Ltd (**TRA**). Prior to this acquisition, TRA was not subject to the reporting requirements in the Modern Slavery Act 2018 (Cth) due to its annual consolidated revenue falling below the statutory threshold.

Following the acquisition and for the remainder of 2024, work commenced to integrate TRA into VINCI Construction Australia Pty Ltd, which included initial discussions regarding compliance with the *Modern Slavery Act 2018* (Cth). Over the next reporting period Seymour Whyte will continue to engage with TRA to assess and manage modern slavery risks in its supply chains. Consequently, the balance of this Modern Slavery Statement does not include data from TRA due to the limited time available within the reporting period following the acquisition. This information will be provided in Seymour Whyte’s Modern Slavery Statement for the financial year 2025.



Operations

Seymour Whyte's main business is undertaking civil contracting to deliver essential infrastructure projects across Australia. We deliver complex, innovative projects that include difficult staging, engineering and environmental challenges, logistical constraints and stakeholder impacts.

To date, we have delivered more than 537 projects across Australia.

Given the size of many of our projects, Seymour Whyte often enters into joint venture arrangements with other entities. Although Seymour Whyte engages closely with its joint venture partners, it does not have control over those entities or responsibility for the management of those entities.

Seymour Whyte's principal joint venture partners in the 2024 financial year were:

1. John Holland;
2. Civmec; and
3. BMD Constructions.

Seymour Whyte's most significant projects in the 2023 financial year were:

1. M12 Central;
2. Pacific Motorway upgrade – Palm Beach to Tugun;
3. Sydney Gateway - Stage 1 and Stage 3 (a joint venture project with John Holland)
4. Western Sydney Airport (a joint venture with BMD Constructions);
5. M1RT Heatherbrae Bypass.

Investments

None of the Seymour Whyte reporting entities have an investment portfolio or lend money.

Supply Chains

In the 2024 financial year, Seymour Whyte spent approximately \$661 million purchasing products and services from more than 2,035 direct suppliers across 10 countries.

Most of Seymour Whyte's direct suppliers are located in Australia, with overseas procurement accounting for only about 0.22% of our total procurement spend.

Seymour Whyte also has direct suppliers located in the United States, Singapore, Ireland, United Kingdom, Germany, New Zealand, Malta, Canada and Denmark.

The main types of goods and services Seymour Whyte procures include:

1. Personnel, including via contractors and labour hire – all such personnel are located in Australia;
2. Logistics;
3. Plant and equipment;
4. Quarry products;
5. Concrete products;
6. Asphalt products; and
7. Road furniture.



Modern Slavery Risks

The risk of modern slavery in Seymour Whyte's operations is low. Seymour Whyte's workforce is located in Australia and enjoy the protections of:

1. Modern Awards and industrial instruments;
2. The National Employment Standards;
3. The various State and Territory work health and safety regimes;
4. The various State, Territory and Commonwealth anti-discrimination regimes; and
5. Seymour Whyte's own policies relating to Quality, Privacy, Remuneration and Benefits, Industrial Relations Management, Health and Safety, Modern Slavery, Rehabilitation and Return to Work, Aboriginal and Torres Strait Islander Participation, Acceptable Behaviour in the Workplace, Diversity and Human Resources Management.

Seymour Whyte has assessed as low the risk that its operations or supply chains might cause or contribute to modern slavery practices.

The principal risk of modern slavery in Seymour Whyte's operations and supply chains is that it might be directly linked to modern slavery practices through the activities of its overseas suppliers. Seymour Whyte has identified the following goods and services purchased in 2024 as representing the greatest risk of modern slavery:

- Seymour Whyte made various purchases of software and information technology services from companies in the United States, Singapore, Ireland, United Kingdom, Germany, New Zealand, Malta, Canada, and Denmark.
- While assessed as lower risk, Seymour Whyte procured some software and information technology services from overseas software / IT companies, which have committed to maintaining data security in alignment with Seymour Whyte requirements. Seymour Whyte is unable to control where and how the software is written/developed prior to being sent to Australia.
- Seymour Whyte made various purchases of plant parts and components suppliers based in the United States to support its operational and project delivery needs.
- While assessed as lower risk, Seymour Whyte procured plant parts from overseas suppliers whose supply chains may involve multiple tiers of manufacturing and logistics. These complex supply chains can limit transparency and oversight of upstream labour practices. Seymour Whyte engages with suppliers that commit to ethical sourcing and compliance with relevant labour laws, however, Seymour Whyte does not have direct control over the sourcing, manufacturing, or labour conditions under which these plant parts are produced prior to their delivery to Australia.



Action taken to assess and address modern slavery risks

Policies, systems and processes

Seymour Whyte has in place policies and procedures dealing with health and safety, diversity and inclusion, and whistleblowing – all of which encourage the confidential reporting of concerns.

Seymour Whyte has introduced terms into all contracts with suppliers which require suppliers to:

1. Warrant that modern slavery practices do not occur within their own business;
2. Warrant that, to the best of their knowledge, modern slavery practices do not occur within the business of their suppliers;
3. Promptly disclose the occurrence of any modern slavery practices within their own business or supply chains.

Seymour Whyte has the power to terminate a supply contract if a supplier breaches legislative requirements.

Due Diligence

Seymour Whyte's modern slavery subcommittee members include:

- Company Secretary / CFO;
- General Counsel;
- Chief Operating Officer (COO); and
- General Manager, Northern & Western Regions.

The subcommittee performed the following tasks in the 2024 financial year:

1. Reviewed the risks of modern slavery within Seymour Whyte's operations and supply chains;
2. Reported to the Boards in relation to the findings and recommendations of the subcommittee; and
3. Assisted the Boards to gather all information required for Seymour Whyte's annual modern slavery statement.

While the following tasks were not required in the 2024 Financial Year, the subcommittee is also responsible for:

4. Overseeing the investigation of any reports of modern slavery within Seymour Whyte's operations and supply chains (no reports were received in the 2024 financial year);
5. Making recommendations to the Boards regarding remedial actions in the event of modern slavery occurring within Seymour Whyte's operations or supply chains; and
6. Making recommendations to the Boards in the event of any supplier non-compliance with modern slavery auditing (no non-compliances were identified in the 2024 financial year).

Remediation

Upon receiving any substantiated report of a modern slavery incident, or receiving any report of supplier non-compliance, the Boards will meet promptly to consider what remediation actions are appropriate.

As the risk of a modern slavery incident occurring within Seymour Whyte's operations or supply chains is low, it is anticipated that the principal forms of remediation will include reviewing and improving existing policies and procedures, and ceasing certain activities (including terminating relationships with non-compliant suppliers).



Assessing the effectiveness of actions taken

Seymour Whyte's modern slavery subcommittee reviewed the effectiveness of the actions taken in 2024 by:

1. Engaging with key areas of the business, with a view to understanding all operations, suppliers, and the unique risks associated with them;
2. Auditing all supplier contracts entered into with a view to ensuring that all contracts include clauses dealing with modern slavery;
3. Issuing annual audit forms to suppliers; and
4. Identifying any new risks of modern slavery.

Seymour Whyte Constructions Pty Ltd's board:

1. met with the subcommittee to discuss and review the findings and recommendations of the subcommittee; and subsequently
2. updated the balance of the Boards regarding the subcommittee's findings and recommendations.

Our consultation process

There was limited consultation between the reporting entities covered by this statement because each of the entities share four common directors.

This statement was approved by the board of each reporting entity.



Seymour Whyte Constructions Pty Ltd
12 Electronics Street
Eight Mile Plains QLD 4113

seymourwhyte.com.au