



Fugro Holdings Modern Slavery Act (2018) Compliance Report December 2025

FAU-25851

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1. Introduction

Fugro Holdings (Australia) Pty Ltd (ACN 003 010 099) and its subsidiaries Fugro Australia Pty Ltd (ACN 119 991 025), Fugro Exploration Pty Ltd (ACN 148 839 865), Fugro Australia Land Pty Ltd (ACN 008 673 916) and Fugro Advance Pty Ltd (ACN 640 722 327), (collectively, Fugro Australia Group), recognises and subscribes to the principle that freedom from slavery is a fundamental human right. Fugro Australia Group remains committed to the UN Guiding Principles on Business and Human Rights, which state that entities have a duty to respect human rights in their operations and supply chains. This commitment includes taking action to prevent, mitigate and, where appropriate, remedy Modern Slavery in our operations and supply chains.

We consider that part of the intention of the Modern Slavery Act 2018 is to support organisations like Fugro Australia Group to engage with the topic and provide a framework for the ongoing expansion and improvement of our capacity to prevent, mitigate and remedy Modern Slavery.

Today, we understand and are actively mitigating the potential for our business and operations to be linked to Modern Slavery, particularly through our supply chains, but also in our own practices and undertakings which are outsourced.

We continue our journey in establishing Fugro Australia Group's role in understanding and ultimately helping to eradicate Modern Slavery, and we are establishing the tools to:

- identify our impacts both positive and negative;
- engage with our personnel and suppliers to detect instances and acts of Modern Slavery in our relationships;
- and to develop strategies and actions to deal with what we find.

This Statement has been prepared under the 'Guidance for Reporting Entities' provided by the Commonwealth Government and submitted to the Australian Border Force for publication pursuant to Section 16 (1) of the Modern Slavery Act.

The Statement was approved by the board of Fugro Holdings (Australia) Pty Ltd as the primary reporting entity and proprietor of the named reporting entities covered in the report, on 26th June 2026. It has been signed by Simon Clode, in his role as a Director of Fugro Holdings (Australia) Pty Ltd and all listed subsidiaries, and a responsible member under the Modern Slavery Act 2018.



Simon Clode
Director Pacific
Fugro

2. Identifying and Describing the Reporting Entity (Reporting Criteria 1 & 2)

Fugro Holdings (Australia) Pty Ltd is a wholly owned subsidiary of Fugro N.V. (Fugro) a globally active Geo-data specialist employing approximately 9,050 people in 140 locations. Fugro originated and is headquartered in the Netherlands, the only country in the world to be awarded an 'A' rating for government response to Modern Slavery.

Fugro operates primarily in Australia, New Zealand, and the Pacific Islands. The company operates several wholly owned subsidiaries, comprising the Fugro Australia Group, as detailed in the chart below, which includes ACN numbers for the relevant entities.

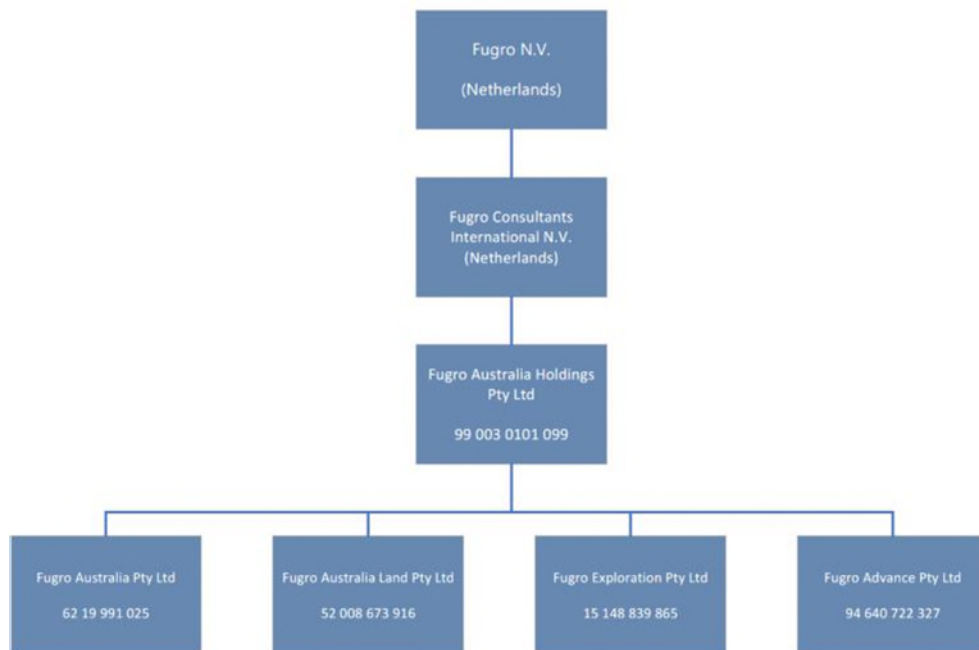


Figure 2.1: Fugro Australia Group organisation chart

Fugro Australia Group's operations comprise several subsidiary companies that all operate under the same leadership structure as Fugro Australia Pty Ltd, sharing common Directors and senior management as well as unified governance model

Each subsidiary plays an operational or administrative role in supporting the delivery of Fugro Australia Group's expertise and resources to clients. Our services are organised into three primary Business Lines:

- Marine Asset Integrity (MAI)
- Marine Site Characterisation (MSC)
- Land

Together, these service lines enable the Fugro Australia Group to operate effectively across a wide range of sectors, including Oil and Gas, Mining, Infrastructure, Water and Defence.

A brief summary of each entity in the Fugro Australia Group and its purpose in the reporting period is as follows:

- **Fugro Holdings Australia Pty Ltd**

A holding company that is the sole shareholder of the entities listed below.

- **Fugro Australia Pty Ltd**

The primary operating entity that employs all personnel in Australia.

- **Fugro Australia Land Pty Ltd**

A dormant entity that was formally deregistered with ASIC on 6th August 2025.

- **Fugro Exploration Pty Ltd**

An investment company which does not employ any staff and has minimal transactions.

- **Fugro Advance Pty Ltd**

An entity that holds IP and does not transact with clients or suppliers or employ any staff.

Fugro Exploration focuses on providing Geo data services to the exploration industry, particularly within the oil and gas sector, while Fugro Australia manages the vessels, personnel, and onshore facilities that support these activities.

2.1 Our Business

The Fugro Australia Group forms part of the global Fugro group, the world's leading Geo Data specialist. Across Australia and the broader Pacific region, the Fugro Australia Group employs approximately 527 professionals who collect, analyse, and interpret detailed information about the Earth and the built environment. By integrating data acquisition, advanced analytics, and expert advisory services, we help clients design, construct, and operate their assets safely, sustainably, and efficiently.

Our operational footprint spans Australia, New Zealand, and the Pacific Islands. As a recognised leader in survey and geotechnical services, the Fugro Australia Group is known for delivering integrated solutions that enhance the safety and performance of both onshore and offshore oil and gas developments. We are also widely respected for our geospatial capabilities, including 3D mapping and asset management services.

The Fugro Australia Group operates several integrated offices and facilities across Australia:

- Perth / West Perth WA
- Balcatta WA
- Adelaide SA
- Brisbane QLD
- Melbourne, VIC

Our client base includes major multinational corporations, United Nations agencies, and Australian government bodies. These organisations maintain Modern Slavery governance

expectations and require a high level of awareness and due diligence from their partners and suppliers.

As outlined above, the Fugro Australia Group operates as a fully integrated business with shared leadership and management structures. This ensures consistent oversight, aligned decision making, and a unified approach to identifying, managing, and responding to Modern Slavery risks.

2.2 Our Suppliers

The Fugro Australia Group personnel work across a wide range of environments throughout Australia, New Zealand, and the Pacific Islands. Our teams use advanced technologies to collect Geo data relating to geography, geology, topography, bathymetry, and both the interior and exterior of built structures. This information is then consolidated and analysed to provide clients with informed advice that supports the planning, development, and ongoing management of their assets.

Our supplier base is diverse and includes providers of specialised technical equipment, as well as general business resources such as IT and communications systems, vehicles, vessels, drones, and UAV/USV/ROV platforms. We also procure goods and services that support our facilities, administrative functions, and corporate operations, including travel, PPE, apparel, and other operational necessities.

For this document, we have compiled a full list of suppliers engaged during the reporting period to assess our organisational risk profile. This information is presented in Section 3 (Reporting Criterion 3). The majority of these suppliers are Australian based and operate within specialised service sectors, which we assess as presenting a low risk of Modern Slavery. Fugro Australia Group is committed to purchasing locally wherever practicable, and the supplier data demonstrates that most of our procurement activity occurs within the local economies in which we operate.

Some categories of goods and services we procure are identified by the Global Slavery Index as higher risk, including:

- Clothing and apparel
- PPE
- Computers and laptops
- Telephones
- Labour hire
- Security services
- Logistics (transport and marine)
- Catering and hospitality
- Building, construction, and fabrication

Where high risk items must be sourced from overseas, Fugro Australia Group typically relies on long standing global relationships with reputable and established suppliers, many of whom operate under formal agreements. When new suppliers are required or ad hoc purchases arise, we undertake due diligence prior to engagement. From late 2025, Fugro has

strengthened its global approach to supplier compliance, implementing more consistent due diligence processes across regions and with the initial introduction of supplier compliance software systems.

Regular internal and external audits of supplier relationships, including risk assessments ensure that we remain informed about the practices, governance standards, and Modern Slavery approaches of the suppliers we work with.

3. Describing the Risks of Modern Slavery Practices (Reporting Criterion 3)

Describing the Risks of Modern Slavery Practices in the Operations and Supply Chains of the Reporting Entity and any Entities the Reporting Entity controls or owns

Understanding the potential risks of Modern Slavery within our operations and supply chains is a complex and ongoing responsibility. Since the previous reporting period, Fugro globally has initiated a comprehensive supply chain assessment aimed at identifying opportunities for improvement and mitigating risks across all regions. This work focuses on determining completeness and whether any aspect of our activities could cause, contribute to, or be directly linked to Modern Slavery. Fugro Australia Group is included in this global program, which is expected to expand further across local entities from early 2026.

Although Fugro Australia Group primarily operates in countries like Australia and New Zealand which are recognised for strong protections against Modern Slavery, political rights, and civil liberties, we appreciate that risks of modern slavery still arise including in relation to the region in which we operate and in relation to our supply chains. Fugro Australia Group continues to strengthen its approach to identifying risks within the supply chain and implementing appropriate mitigation measures.

This includes that we have prioritised the formal assessment of new suppliers and enhanced our evaluation of Modern Slavery practices across our operations and business relationships. All suppliers engaged during the reporting period have now been included in supply chain mapping and subject to structured risk identification processes.

3.1 Our Operations

Fugro Australia Group provides technical services to a wide range of clients in Australia, New Zealand, and the Pacific Islands. We deploy highly qualified personnel to various land-based and offshore facilities to conduct asset integrity and site characterisation related services. We therefore consider that this aspect of our operations is going to have reduced potential to cause or contribute to Modern Slavery.

However, we are aware that areas of vulnerability may exist in services we outsource, including vessel hire and crewing, transport and logistics, security, catering and hospitality, cleaning and facilities management, the purchasing of PPE and apparel, and in cases where local labour is hired to assist in operations.

The Fugro Australia Group award contracts for most of these goods and services through tenders and quotations processes that include due diligence of the vendors and suppliers. This approach is intended to assess, manage and mitigate the risk of Modern Slavery arising from or connected to our operations across these categories.

3.2 Our Suppliers

The tables below provide insight into the types of goods and services, and countries, of operation of Fugro Australia Group's suppliers, and our assessment of the risks of their activities causing or contributing to Modern Slavery.

In the 2025 reporting period, we have expanded the assessment information to include the complete company supply chain and have started formal supplier engagement, including Supply Chain Assessment Questionnaires, to ensure compliance.

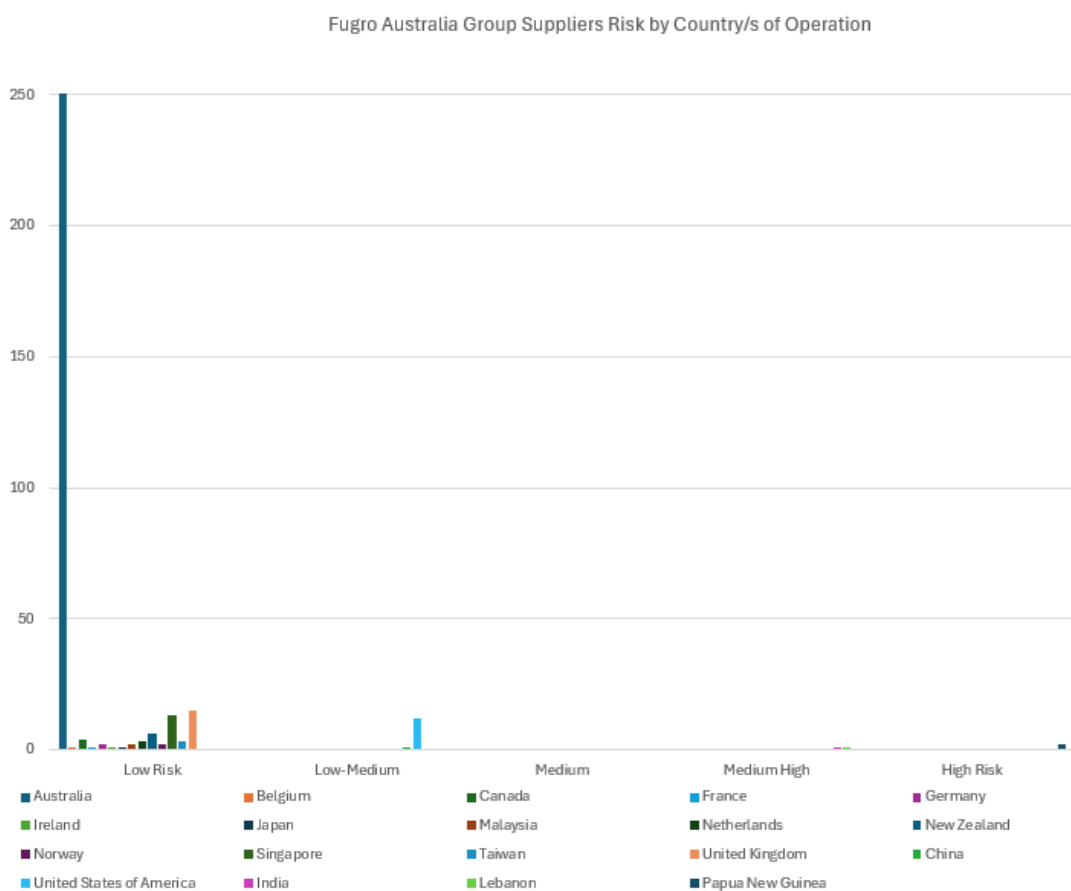


Figure 3.1: Fugro Australia Group's Suppliers – Risk Assessment by of Operation

Fugro Australia Group Volume of Purchases by Country of Operation

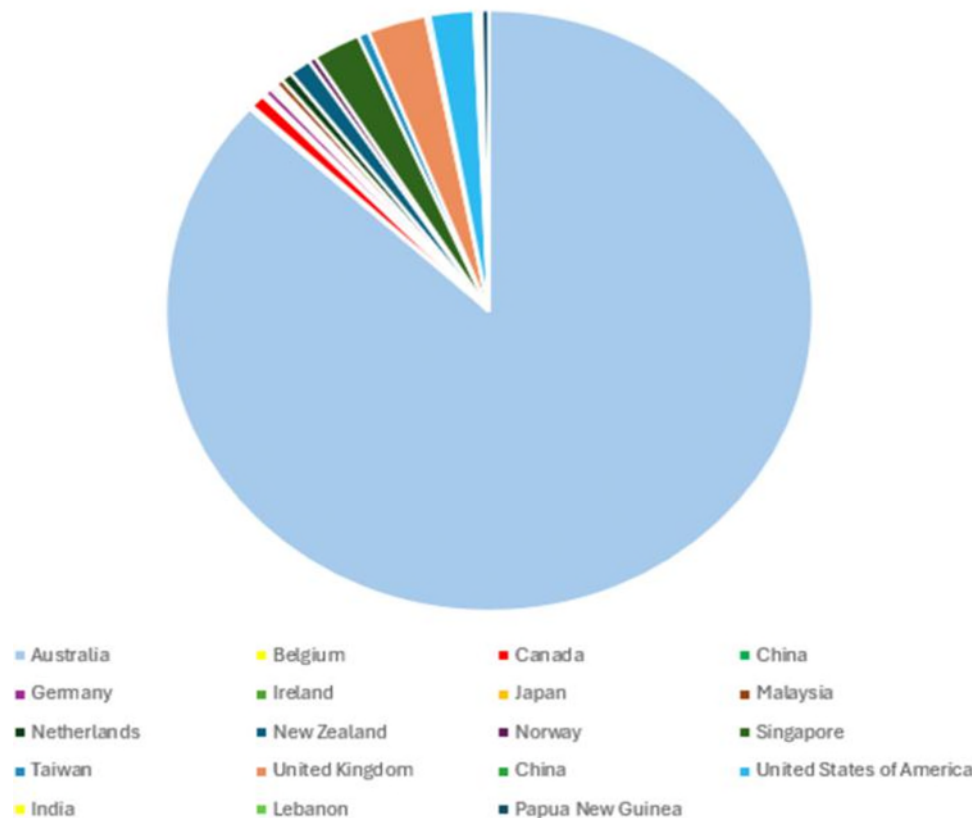


Figure 3.2: Fugro Australia Group's Suppliers – Volume of Purchases by Country of Operation

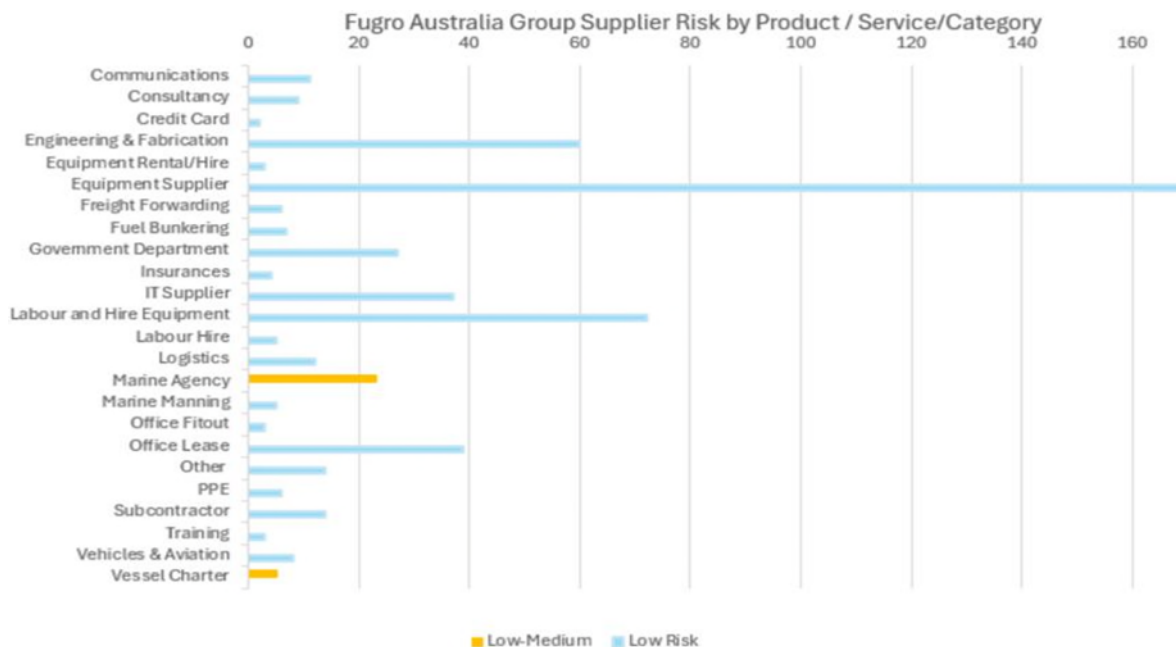


Figure 3.3: Fugro Australia Group's Suppliers – Risk Fugro Assessment by Product / Service Category

Fugro Australia Group Suppliers by Product / Service Category

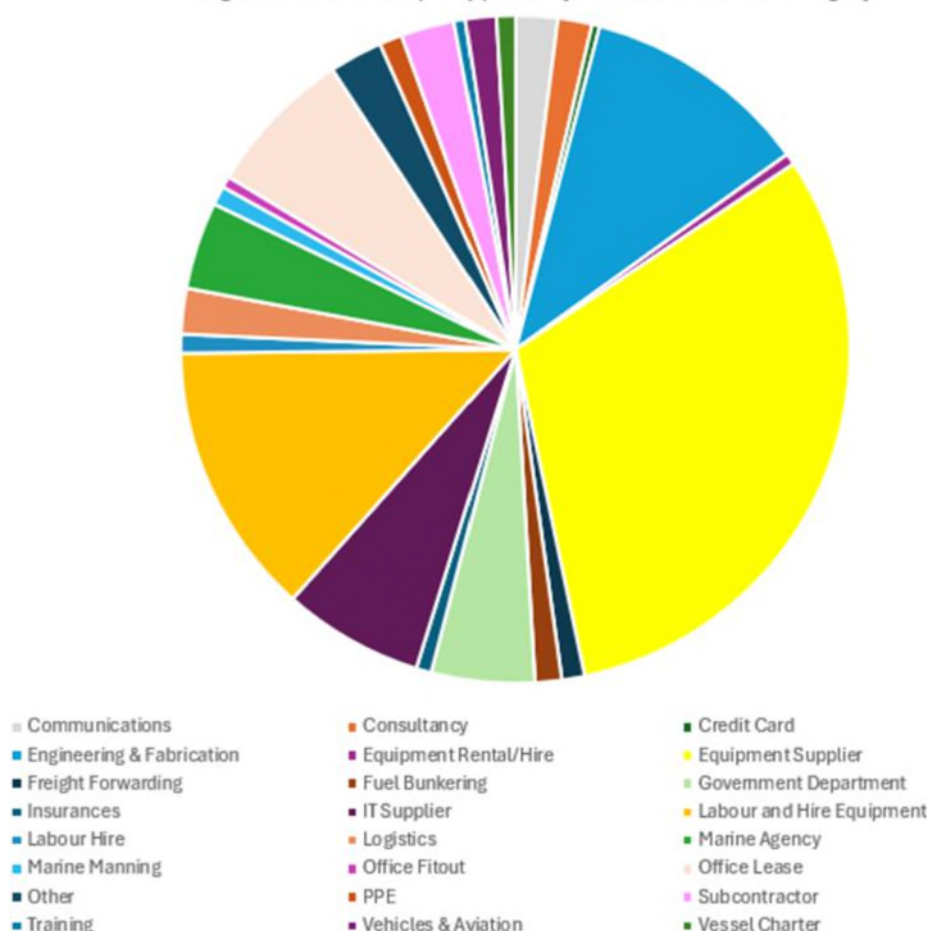


Figure 3.4: Fugro Australia Group's Suppliers – Volume of Purchases by Product / Service Category

3.3 Looking Forward

Participation in the requirements of the Act has provided Fugro Australia Group with a constructive framework for assessing and managing the risk that our operations or procurement activities could cause, contribute to, or be linked to Modern Slavery. The continued development of actions and policies will support our ability to identify and address risks associated with our activities and business relationships, including:

- Involvement with the Fugro Australia Group Modern Slavery Oversight team
- Further implementation of the formalised risk assessment structure and enhancement of supplier evaluation processes
- Exploring traceability methods to improve visibility of product origins and material sources
- Communication of increased compliance expectations for suppliers operating within Fugro's systems
- Collaborating with peer organisations in our sector to share insights and, where appropriate, jointly assess high risk areas of the supply chain

These initiatives form part of the broader commitment to strengthening due diligence, improving transparency, and ensuring that our approach to Modern Slavery risk management remains consistent, informed, and aligned with global best practices.

4. Actions Taken by the Reporting Entity (Reporting Criterion 4)

Describe the Actions taken by the Reporting Entity and any Entities that the Reporting Entity Owns or Controls to Assess and Address these Risks, including Due Diligence and Remediation Processes

In alignment with our Group's values and principles, we endeavour to conduct our business with integrity and maintain high ethical standards in our relationships. We aim to uphold clear expectations for ethical behaviour within our own operations and promote the same standards among the third parties who work with us or act on our behalf.

Fugro Australia Group seeks to implement and enforce robust systems and controls to ensure that modern slavery and human trafficking do not occur within our operations or our supply chain.

4.1 Our Policies

Respect for human rights is central to the Fugro Australia Group's values and is embedded in our Code of Conduct. Our Human Rights Policy prohibits all forms of slave, forced, bonded, indentured, or prison labour. These standards apply equally to all Fugro companies and to the conduct expected of every individual working for or with us. Employee and contractor remuneration aligns with applicable wage laws, collective bargaining agreements, and International Labour Organization (ILO) standards. Where relevant, we also uphold international maritime requirements, including the Maritime Labour Convention.

Fugro's global Speak Up Procedure provides employees, temporary workers, contractors, suppliers, and customers with a confidential channel to raise concerns or report potential noncompliance. Individuals who use this procedure are protected from retaliation.

Information about our Code of Conduct, supporting policies, and the Speak Up Procedure is made available to all employees worldwide and is accessible through our company intranet.

4.2 Suppliers and Partners

Fugro Australia Group seeks to engage suppliers and business partners who demonstrate a commitment to sustainable development and who operate in an environmentally and socially responsible manner. As part of our supply chain compliance program, we use pre-qualification processes, such as supplier questionnaires, to assess prospective suppliers. Where relevant, these questionnaires include enquiries about the supplier's controls relating to human trafficking and Modern Slavery legislation.

Fugro Australia Group maintains a Supplier and Partner Code of Business Principles, which requires suppliers and partners to comply with applicable laws and regulations, including those relating to slavery and human trafficking. The Code also obliges suppliers to treat workers fairly, provide safe and healthy working conditions, and eliminate all forms of forced, compulsory, and child labour.

Fugro Australia Group reserves the right to audit compliance with the Supplier and Partner Code. Failure to meet these requirements may result in immediate termination of the business relationship or the implementation of mandatory improvement actions.

We work with suppliers at both global and local levels to incorporate the Supplier and Partner Code into our contractual arrangements. During the reporting period, we completed and applied a Supplier Questionnaire that requests, among other information:

- Details of the countries and regions in which the supplier operates
- Disclosure of any past, current, pending, or threatened investigations or prosecutions relating to bribery or corruption
- Copies of the supplier's Approved Supplier List and Supplier Management Procedure
- Access to supplier records, including audit reports, site visit outcomes, and relevant statistics
- Information on materials traceability and identification across areas such as fabrication, rigging, consumables, equipment hire, and service provision

Additionally, our Supplier Account Set Up process invites suppliers to commit to the Supplier and Partner Code. If a supplier declines, they are required to provide the reasons for their refusal.

During the reporting period, Fugro Australia Group engaged with several key stakeholders on Modern Slavery matters. Activities included:

- Conducting visits and audits of selected maritime and logistics suppliers
- Providing information on Fugro's Modern Slavery approach to clients, government bodies, and prospective clients through tender and project documentation
- Entering into client contracts that included Modern Slavery related clauses and obligations

4.3 Suppliers and Partners: Vessels

Although many crew members on Fugro vessels are directly employed by the company, we also work with external crewing agents to support our operations. We recognise that relying on third party agents can heighten labour rights risks, and throughout 2025 we continued strengthening our approach to mitigating these risks. Alongside steadily reducing the number of agents we engage, our oversight processes now place stronger emphasis on Modern Slavery considerations during supplier selection and contracting, supported by more rigorous audits and direct engagement with seafaring crew.

4.4 Training

A worldwide mandatory Code of Conduct training program is in place to ensure awareness throughout Fugro Australia Group of the need to act with integrity and do business responsibly.

4.5 Looking Forward

In the next reporting period, we envisage making added progress in applying policies and actions that will assist in addressing the risks associated with our activities and business relationships, including:

- Continuing with review, and where required, updating requirements for statements and policies specifically related to Modern Slavery within Fugro Australia Group documentation such as Expressions of Interest (EOIs), Requests for Tender (RFTs) and Requests for Quotations (RFQs);
- Continued engagement with increased numbers of suppliers on the issue and continuing to identify higher risk suppliers subject to Fugro Australia Group's intensified screening and qualification procedures;
- Promoting Fugro's Speak Up program and reporting if it sufficiently covers the issue of Modern Slavery, and if identified, recommending amendments that would make it more effective in this area;
- If required, creating a separate remediation process related strictly to Modern Slavery.

5. Assess the Effectiveness of Actions Taken (Reporting Criterion 5)

Describe how the Reporting Entity assesses the Effectiveness of Actions being taken to Assess and Address Modern Slavery Risks

Fugro Australia Group undertakes regular internal and external auditing of its practices and business relationships to assess adherence to our policies and regulatory compliance requirements.

Given the Fugro Australia Group's awareness of the issue through compliance with the Act, continue with providing robust effectiveness around assessment measures, including:

- Mandating that the Fugro Modern Slavery Working Group review the actions taken to assess risks, identify instances and incidents involving Modern Slavery, and the remediation processes required;
- Engagement with suppliers to review their risks and responses to Modern Slavery, and entering into discussion to verify the effectiveness of our action's vis a vis their responses to Modern Slavery;
- Putting in place measures to track awareness of and compliance with our actions in the Modern Slavery space;
- Continuing review and, if necessary, updating training programs, including potential implementation of education modules specific to Modern Slavery.

No incidents or practices that could be described as causing Modern Slavery have been reported in Fugro Australia Group's operations, and while we are aware of the risks of contributing to or being linked to Modern Slavery practices through our supply chain, we are not aware of any such incidences for the reporting period.

Relatedly, assessment of the Speak Up program to determine whether any complaints or grievances relating to modern slavery was made during the reporting period and as identified above, none were identified.

6. The Process of Consultation (Reporting Criterion 6)

Describe the Process of Consultation with any entities the Reporting Entity Owns or Controls

As stated in Criterion 1/2, Fugro Australia Group operates several subsidiary companies – in all cases the same Directors provide leadership, and the management of these companies is undertaken by the Fugro Australia Group management team. As these entities all operate under the same direction and governance, and all have committed to abide by the Purpose and Values articulated by Fugro N.V. (see Criterion 7 below), for the purposes of this document.

7. Any Other Relevant Information (Reporting Criterion 7)

There is no additional relevant information in the reporting period.