



The Douglas Group Ltd

Modern Slavery Statement

2024

1. Introduction

The Douglas Group Ltd ACN 002 624 357 and its related bodies corporate (**Douglas Group**) are committed to supporting ethical labour practices and preventing the existence or prospect of modern slavery within our organisation and our supply chains through the continuous improvement of our modern slavery framework, relevant policies and engagement with our suppliers.

Treating people with respect is fundamental to the Douglas Group's values, long-term stability and growth, and the wellbeing of the communities in which we operate. At the Douglas Group, this means doing business in a way that acknowledges and respects the rights of our people, customers, suppliers and contractors to be free from practices of modern slavery.

This statement constitutes the Douglas Group's modern slavery statement in accordance with the *Modern Slavery Act 2018* (Cth) (**Act**) for the financial year ended 30 June 2024.

This is the fourth Modern Slavery Statement by the Douglas Group. In this statement, we set out the achievements and milestones over this reporting period and our future planned actions to continue improving our management of modern slavery risks.

2. Reporting entity, structure and operations

Structure

The Douglas Group Ltd is the ultimate holding company of its related bodies corporate.

Douglas Partners Pty Ltd is the main operating entity of the group. It is incorporated in New South Wales, with over 600 employees across 19 offices in NSW, QLD, VIC, WA, NT and ACT. Douglas Partners is an Australian engineering consultancy business, which specialises in geotechnical and environmental advisory services. It primarily provides services in relation to projects in Australia, with occasional international projects in New Zealand and Papua New Guinea. Its registered office is at 96 Hermitage Road West Ryde NSW 2114.

Ground Test Pty Ltd is the other operating entity, which carries out a range of site investigation and drilling services to the geotechnical, environmental and groundwater industries.

Douglas Partners' and Ground Test's operations and supply chains are dependent on and overlap with the Douglas Group. Accordingly, their risks have been considered and incorporated into this statement. The non-operating entities in the Douglas Group do not pose additional modern slavery risk that are not already dealt with by the Douglas Group.

Supply Chain

The Douglas Group's suppliers are providers of a variety of goods and services, including the supply of corporate uniforms, personal protective equipment, construction materials including raw resources, machinery and equipment hire, communications services, traffic management solutions, security services, waste and recycling facilities and information technology.

The Douglas Group aims to do business with suppliers that have similar values, ethics and sustainable business practices. Further information on our supply chain is set out below:

(a) Services provided by suppliers

The Douglas Group's supply chain primarily comprises local professional engineering consulting providers, drilling contractors and testing contractors that we collaborate with to assist in our project delivery. We also directly engage suppliers of services to assist with the ongoing operation and maintenance of our offices, including facility management.

(b) Products provided by suppliers

The Douglas Group predominately procures information and communication technology hardware and software required to operate our business. Other office products that are procured directly are mainly from local Australian suppliers.

(c) Products and services used by indirect suppliers

Products from indirect suppliers are predominantly related to office management, such as paper and consumables. Services from indirect suppliers can be via subcontractors to our professional engineering consultancy suppliers, as well as for the provision of office services such as security, couriers, cleaning, rubbish removal, provision of plants, catering, transport and utilities.

3. Modern slavery risks

The majority of our workforce comprises salaried skilled professional staff. From time to time, we engage subconsultants and subcontractors to support areas of operation, generally for particular engineering, drilling and testing expertise.

The core of the company relies on employees who are professional engineers and scientists. Head office and support teams exist for IT, Administration, Finance, Human Resources, Work Health and Safety, Quality Assurance, Marketing and Legal.

Ground Test provides a range of drilling services to the Douglas Group and external businesses in the geotechnical, environmental and groundwater industries.

The Douglas Group acknowledges the risk of modern slavery within its supply chain and operations. However, we consider the risk of modern slavery to be low due to the nature of our local operations and the services that we and others in our supply chain provide.

We endeavour to mitigate residual risks of modern slavery, however through the continuing implementation of measures identified in our Modern Slavery Framework Plan below.

4. Actions and effectiveness

The Douglas Group is committed to continual improvements and has implemented practices and measures to minimise the risk of modern slavery and human trafficking taking place within our supply chain.

In our first Modern Slavery Statement, the Douglas Group provided its Modern Slavery Framework Plan. This set the roadmap for our modern slavery risk management framework. We have continued implementation of and further development of that Plan, as set out in this Modern Slavery Statement.

Modern Slavery Framework Plan

Task	Description	2022	2023	2024
Modern Slavery Framework Plan	Roadmap for building our modern slavery risk framework.	Completed	Completed	Completed
Subcontractor/Subconsultant/ Supplier Pre-Qualification Questionnaire	Revised supplier due diligence questionnaire to check that suppliers address modern slavery risks in their operations and supply chains and have processes for identifying, investigating and remedying relevant risks.	Completed	Completed	Completed
Subconsultant/Subcontractor Agreements	Revised contract templates to require subcontractors and subconsultants to take reasonable steps to identify, assess and address modern slavery risks in the operations and supply chains used in providing services to the Douglas Group.	Completed	Completed	Completed
Subcontractor Work Health Safety & Environment Management Handbook	Require subcontractors to affirm that they do not engage in any modern slavery	N/A	N/A	Completed
Modern Slavery Statement	Modern Slavery Statement for the financial year ended 30 June.	Completed	Completed	Completed
Purchase Order Terms (annual review)	Contractually requiring suppliers to take reasonable steps to identify and address modern slavery risks.	N/A	N/A	Completed
Modern Slavery Policy (annual review)	Modern Slavery Policy on managing	In progress	Completed	Completed

	modern slavery risks in its businesses.			
Whistleblower Policy (annual review)	Update existing Whistleblower Policy to address modern slavery risks. This policy has also been updated to provide details of an anonymous whistleblower hotline available to staff.	In progress	Completed	Completed
Modern Slavery Training	Staff training on modern slavery framework, policy and procedures on addressing modern slavery risks.	Planned	In progress	In Progress
Implementing, administering, monitoring compliance	Ongoing responsibility for implementing and administering the policies, procedures and monitoring compliance.	Planned	In progress	In progress
Annual supplier risk assessment	Determine level of risk associated with suppliers, to inform internal audit.	N/A	Planned	In progress
Annual internal audits	Audit high-risk suppliers to monitor compliance with Douglas Group modern slavery policy and supplier code of conduct.	Planned	Planned	Planned

As identified above, the Douglas Group has successfully implemented key measures in its Modern Slavery Framework Plan so as to mitigate the risks of modern slavery practices in its business, including the review of our Modern Slavery Policy, update to our Subcontractor Work Health Safety & Environment Management Handbook, and the commencement of the initial stages of implementing an annual supplier risk assessment to identify and address modern slavery risks.. In completing key tasks, no further modern slavery risks have been identified nor existing risks exacerbated.

We have not received any reported modern slavery risks through our whistleblowing channels or otherwise from businesses in our supply chain.

Whilst we consider our current measures to be effective, we remain committed to the continued implementation of our Framework Plan and ongoing evaluation of the measures within it, so that it can be revised as necessary to address any new or emerging risks.

The Douglas Group Board, Risk Committee and Legal team have the ongoing responsibility for implementing and administering the relevant policies and procedures, monitoring compliance and reporting to the Board.

5. Consultation

The Risk & Audit Committee plays an important role at the Douglas Group in overseeing the regular review of risk management activities, including the continuous improvement and support of modern slavery policies and guidelines. Its members comprise directors and executives of the Douglas Group with oversight across the business' functions. The Risk Committee has made assessments of the Douglas Group's modern slavery risks, which has involved consultation with the Finance and Legal teams and other parts of the business responsible for procuring suppliers. Consultation with relevant stakeholders through our operations, including our Procurement team, is ongoing as the framework continues to be implemented.

6. Other information

The Douglas Group acknowledges its important obligations to identify and address modern slavery. We are committed to minimising the risk of modern slavery in our organisation and supply chain through the continuing implementation of our Modern Slavery Framework Plan and its ongoing evaluation. We understand that modern slavery is less likely to exist where other human rights are respected. Therefore, we expect all employees and suppliers to comply with these commitments, which we endeavour to achieve through compliance with our relevant policies and other measures set out above.

This statement was approved by the Board of The Douglas Group Ltd on 25 November 2024.

Signed in accordance with the requirements of the *Modern Slavery Act 2018* (Cth).

Bruce Stewart
Bruce Stewart
Chair
The Douglas Group Ltd

25/11/2024
Dated

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of

as defined by the *Modern Slavery Act 2018* (Cth)¹ (“the Act”) on 25/11/2024

Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of

as defined by the Act²:

Bruce Stewart

Bruce Stewart

Chair, The Douglas Group Ltd

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.	
b) Describe the reporting entity's structure, operations and supply chains.	
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.	
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.	
e) Describe how the reporting entity assesses the effectiveness of these actions.	
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).*	
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.

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- 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 body within the entity, or a prescribed member or members of the entity.
 - 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.