



Beca Modern Slavery Statement

1 Introduction

The Beca group of companies (**Beca Group**) is dedicated to conducting business in a lawful manner and to the highest standards of business ethics. We expect our suppliers to conduct business to the same high standards.

Beca Group opposes all forms of slavery and human trafficking and is committed to ensuring modern slavery or trafficking does not exist in any part of Beca or in our business dealings. We strive to achieve this by acting ethically and with integrity and transparency, and by acting in accordance with our standards and principles including as outlined in this policy.

This statement constitutes the Beca Pty Ltd ACN 004 974 341 (**Beca Australia**) modern slavery statement in accordance with the *Modern Slavery Act 2018* (Cth) for the financial year ending 31 March 2021.

2 Structure, operations and supply chains

2.1 Structure

Beca Australia is structured as a company incorporated in Victoria, with approximately 450 employees across offices in Brisbane, Sydney, Canberra and Melbourne. Beca Australia's registered office is at: Level 4, 5 Queens Road Melbourne VIC 3004.

Beca Australia is part of the Beca Group. Beca Australia's ultimate holding company is Beca Group Limited.

Beca Australia owns/controls the following entities (**subsidiaries**):

Beca Consultants Pty Ltd, ACN 003 431 089, located at Level 4, 5 Queens Road Melbourne VIC 3004 (**BCPL**). BCPL carries out the same type of services as Beca Australia. As it only has one employee, it relies on secondees and sub consultancy services from Beca Australia to provide its services. As a result of this, it does not face modern slavery risks that are not already dealt with by Beca Australia. Accordingly, for the purposes of this statement, a reference to Beca Australia includes a reference to BCPL.

2.2 Operations

Beca Australia is an independent advisory, design and engineering consultancy business. Beca Australia primarily provides services in relation to projects in Australia, but occasionally does provide services for projects outside of Australia. Beca has been in existence for over a century in New Zealand and for more than fifty years in Australia, and the group currently has more than 3,000 employees in more than 20 offices around the world. Aside from our Australian offices, others are in New Zealand, Singapore, Indonesia, New Caledonia, the Philippines, Myanmar, Thailand and Fiji. All locations provide professional engineering consultancy and associated services and Beca Australia provides services to other Beca companies in these countries.

The majority of our employees are office-based, with a small number of exceptions where professional support is provided on project or client sites. The core of the company relies on employees who are professional engineers, drafts people, planners, project managers,

hydrologists, and architects. Support teams exist for IT, Administration, Finance, and People and Culture.

Beca has generally long-term relationships with our software and ICT hardware vendor, with professional service consultants being commissioned on an as-required basis for projects.

2.3 Supply chain

As an engineering and professional services consulting firm, Beca considers the risk of modern slavery and human trafficking in its supply chain to be low. This is largely due to the nature of our business and the services that we and others in our supply chain provide.

(a) Services provided by suppliers

Beca Australia's supply chain is primarily comprised of professional consultancy service providers that we collaborate with to assist in our project delivery. In some instances, this service is provided by Beca employees in other countries, Other professional service consultants are commissioned on an as-required basis and are predominantly office-based and located in Australia.

We also directly engage suppliers of services to assist with the ongoing operation and maintenance of our offices including, for example, facility management as well as the provision of services such as legal, immigration consulting and auditing.

(b) Products provided by suppliers

Beca predominately procures ICT hardware and software required to operate a professional consulting business. Most hardware and software is procured from large suppliers in the USA. Other office products are procured 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 from sub-contractors to our professional 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. Note some of these are contracted directly in some office locations.

3 Risks of modern slavery practices

Beca considers the risk of modern slavery and human trafficking in its supply chain to be low. This is largely due to the nature of our business and the services that we and others in our supply chain provide which meet sound internal or industry standards. Many of our product and service suppliers are large organisations which are covered by various Modern Slavery legislation in Australia and throughout the world. We consider the risk of modern slavery and human trafficking to potentially be highest with smaller local suppliers and sub-contractors such as office cleaners and security.

There have been no reported concerns relating to modern slavery and human trafficking via our whistleblowing channels.

We do not believe that COVID-19 has had an appreciable effect on our operations or supply chain throughout 2021.

4 Actions to assess and address risks

Overview:

Beca is committed to continual improvement and has implemented practices and measures to minimise the risk of modern slavery and human trafficking taking place within our supply chain. These include:

- (a) Undertaking our own due diligence of suppliers and subconsultants with which we do business.
- (b) Confirming all employees have a written contract of employment that enshrines our employees' rights and entitlements at law.
- (c) Developing and implementing policies for safe and respectful work environments which promote health and wellbeing.
- (d) Agreeing on contractual terms with our suppliers and subconsultants requiring compliance with applicable laws.
- (e) Identifying and working with companies that are known to us and that have standards that are aligned with our own.
- (f) Promoting our Ethics policy which demonstrates our commitment to acting ethically and with integrity in all our business dealings. This policy is available to our employees.

We continually develop systems, controls and training (which includes training for our existing team and new hires) so that our due diligence in respect of those we do business with is embedded in our processes to monitor, and minimise, the risk of slavery and human trafficking in our supply chain.

Actions Taken in the Last 12 Months:

A multi-disciplinary team has now been established, comprising representatives from People and Culture, Risk, and Procurement and the inhouse Legal team. The team has been meeting regularly to scope the risks from a procurement perspective and estimate relative risk and these risks are now recorded in the Modern Slavery Risk Register. Further details on this is contained in section 5 below.

A business case is being established for the approval of a supplier on-boarding process which will include the development of a supplier questionnaire and code of conduct. Going forward, new contracts will require the potential supplier to state its level of compliance with Modern Slavery legislation. It is intended that once established, in most instances only approved suppliers will be able to be used by Beca Australia.

The team has identified that existing policies and training will need to be updated to provide for Modern Slavery risks, and processes need to be incorporated into our Business Management System to manage risks associated with Modern Slavery with our suppliers.

The team is meeting regularly while Modern Slavery risk mitigation procedures are still being established. The team will report progress to the Managing Director 6 monthly, including on any KPIs set, and any concerns that may arise.

5 Effectiveness of actions to assess and address risks

Modern Slavery related risks are recorded in the Modern Slavery Risk Register, in accordance with the requirements of Beca's QP27 Group Risk Framework, where the risk is clearly defined in terms of the following:

- risk category;
- risk event description, cause(s) and consequence(s);
- risk manager;
- existing controls in place;
- risk likelihood and consequence;
- current risk level score considering the effectiveness of existing controls;
- residual risk score considering the effectiveness of proposed mitigation actions;

The effectiveness of controls required to eliminate or minimize each modern slavery risk are assessed using the scale outlined in the table below:

Effective	<p>Nothing more to be done except review and monitor the control for implementation and effectiveness.</p> <p>Management consider the control to be well designed for the risk, and addresses the root causes.</p> <p>Management believes the control is effective and reliable at all times.</p>
Generally Sound	<p>Control has been designed correctly and is in place and effective.</p> <p>Some more work needs to be completed to improve its operating effectiveness, or management has doubts about the effectiveness and reliability of the control.</p>
Needs Improvement	<p>Significant control gaps.</p> <p>Either the control does not treat the root causes or does not operate at all effectively.</p>
Under Development	Control has not been established but is being developed.
Not in Place	Control has not been established.

A work plan is then established to document the actions required to further establish, implement and monitor the effectiveness of existing controls and proposed mitigation actions. The work plan includes the following information:

- control description;
- control owner;
- actions required to establish, implement and monitor the effectiveness of the control;
- action owner;
- target start and completion date for each action;
- method of obtaining assurance control is in place and effective;
- internal auditor details.

The Board will review major risks to which the Beca Group is, and is likely to be, exposed to and approve internal auditors and the scope of their audit function.

The Audit and Risk Committee's mandate includes providing oversight of our governance, audit function, legislative compliance and risk management function on behalf of the Board. This mandate includes regular reviews of progress made in relation to closing-out any actions arising from internal audits.

Annually the Board reviews the effectiveness of our audit function, including to review the effectiveness of the methods and actions taken by Beca Australia's to assess modern slavery risks. The Board reviews significant audit and compliance issues including modern slavery risks, and approves action and remediation plans following Audit and Risk Committee recommendations.

The Modern Slavery Risk Register is reviewed on a six-monthly basis with subject matter experts. The scope of the review includes:

- the effectiveness of Beca Australia's risk assessments;
- determining if a risk is live or is closed;
- determining if a risk event description, cause(s) and consequences(s) has changed;
- re-assessing Current and Residual Risk Level scores to consider the effectiveness of existing controls and progress made in proposed mitigation actions;
- identifying any emerging risks.

Key performance indicators are being established and agreed, and will likely include:

- the amount of education/ training given,
- the number of complaints resolved through a grievance mechanism (yet to be devised),
- the steps taken to include modern slavery clauses in contracts,
- the actions taken with suppliers to improve their ability to respond to modern slavery risks.

6 Consultation process

BCPL's operations and supply chains are dependent on and overlap with Beca Australia. Accordingly, BCPL's risks have been considered and incorporated into the above statement, and no consultation is required.

7 Other relevant information

NA

This statement was approved by the board of Beca Australia on 29 September 2021.

Signature	
Name	Craig Lee
Position	Managing Director Beca Australia
Date	29 September 2021