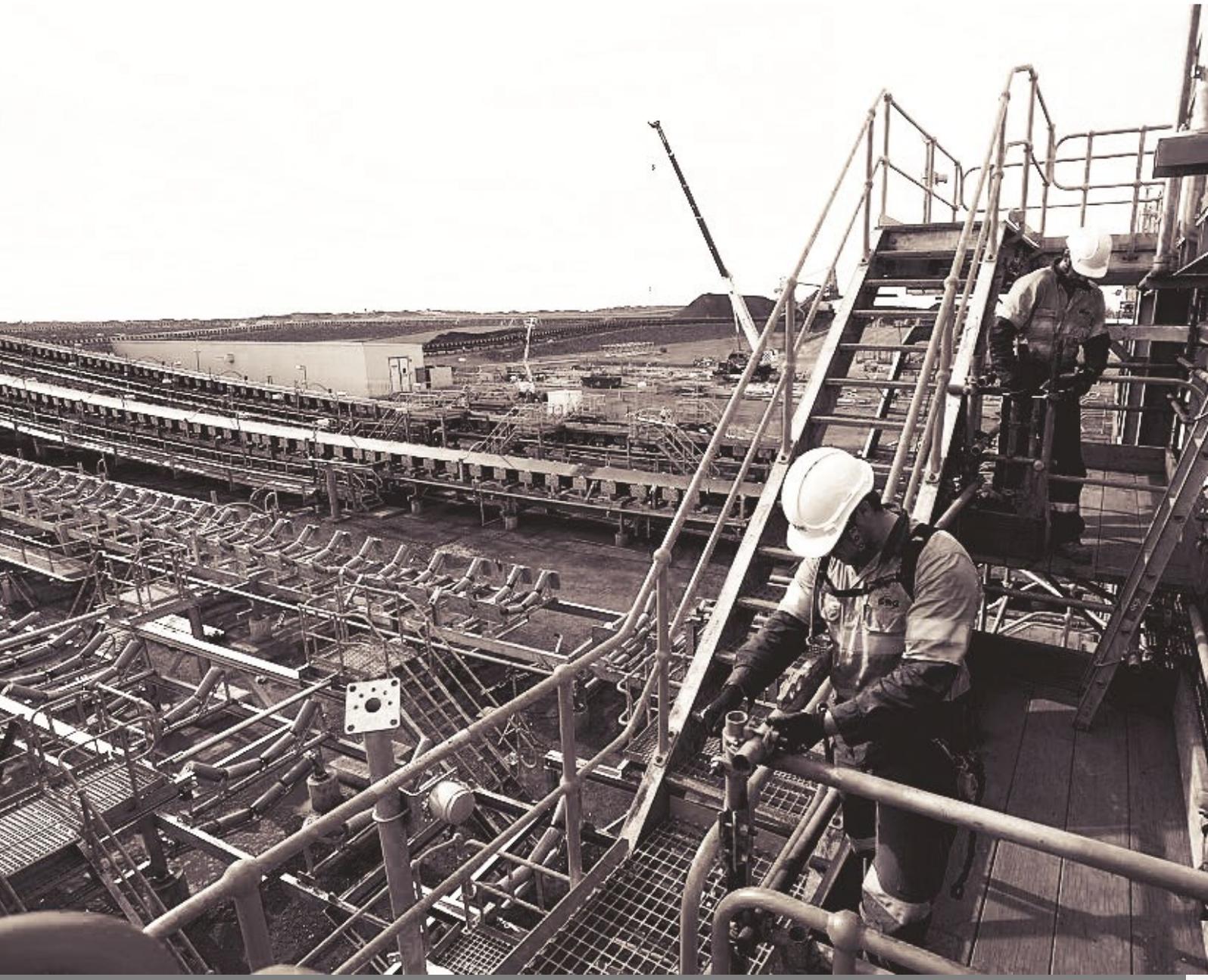


# 2021 Modern Slavery Statement



## Acknowledgement of Country

SRG Global acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea, and community in which we conduct our business.

We pay our respects to Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples.



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## STATEMENT ON REPORTING ENTITY

Our second statement for the reporting period 1 July 2020 – 30 June 2021 is submitted in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) (**Act**) on behalf of SRG Global Limited and its controlled subsidiaries (**SRG**) that are reporting entities (**Statement**).

SRG Global Limited (ABN 81 104 662 259) is an Australian public company listed on the Australian Stock Exchange (ASX: SRG) with its corporate head office located at Level 1, 338 Barker Road, Subiaco WA, Australia.

SRG risk assesses and manages its exposures to modern slavery at a group level which includes the establishment of governance policies, procedures, and systems. Individual consultation with each SRG subsidiary was not required for the purposes of this Statement.

A full schedule of SRG reporting entities is located at appendix A.

This Statement does not represent or is intended to cover any joint venture vehicle or asset which is not either wholly owned or controlled by SRG.

In preparing this Statement, SRG has considered the feedback received from the Australian Border Force following the issuance of our 2020 *Modern Slavery Statement*, external published material and by reviewing the submissions of Australian reporting entities during 2020 and published peer statements.

All references to 'us', 'we', 'our' or 'the Company' in this Statement is a reference to SRG as identified in its FY21 Annual Report.



# CHAIRMANS' STATEMENT

SRG's second modern slavery statement builds upon the foundations and objectives we set ourselves at the end of the 2020 reporting period.

As the world continues its economic recovery from the impacts of COVID-19, we have continued to *live for the challenge*, proactively engaging with our workforce and Supply Partners to deliver sustainable projects for a better tomorrow.

The past 12 months have again demonstrated both the vulnerabilities and fragility of supply chains not just in Australia, but across the globe. COVID-19 continues to challenge economic recoveries on a global scale through rolling lockdowns, stringent health directives and rising costs.

## **We are Smarter Together**

As we enter a new phase of re-opening, we recognise that our ability to deliver for our clients is not limited to our workforce alone. Importantly the organisations we deal with through our many supply chains (**Supply Partners**) form a cohesive part of how we deliver value to our clients.

What we cannot do however, is lose focus on the risks posed as global supply chains recover. Vulnerable peoples remain more exposed than ever to oppressive working conditions as developing economies seek to backfill and expedite orders cancelled or delayed due to lockdowns and delivery delays.

Whilst SRG's Supply Partners are primarily concentrated within Australia, we

recognise the opportunity we have to promote the global principles of the United Nations, using our platform to ensure the ethical treatment of all peoples and human rights.

## **Creating a Sustainable Future**

Environmental, Social, Governance (**ESG**) is no longer a desirable action for organisations to work toward, but a fundamental part of operational excellence.

Whilst this Statement is a focus on our commitment to managing the risks of modern slavery conditions with our supply chain, our stakeholders are equally focused on how we can promote social engagement opportunities for the communities in which we operate.

During FY21 reporting period, we entered a partnership with the Njamal people creating the *Bugarrba Joint Venture* to promote engagement with major clients in Western Australia's Pilbara region.

With a translation of 'Country' in Njamal language, the joint venture promotes sustainable employment for not only the

Njama people, but for Aboriginal people more broadly with some of Australia's most recognised brands.

This partnership, the first of its kind, presents an exciting opportunity for the Aboriginal people of the Pilbara region and we are proud to be leading this journey.

This is a key example of how we continue to our skillset to promote sustainable growth for our communities for the future.

### **Our Commitment**

To date we have not identified any breaches of our Code of Conduct from our Supply Partners. That noted, we recognise that one year of no



**Peter McMorrow**  
Chairman  
SRG Global Limited



identifiable breaches does not mean we can step back. Our aim is to remain vigilant and proactive across all aspects of our supply chain.

As we recognise that the safety of our own workforce is a glass ball we cannot afford to drop, so to it is the safety and wellbeing of the workforce of our Supply Partners.

We are committed to the challenges we set ourselves, to promoting human rights and the fair and equal treatment of all human beings for a better tomorrow.

This Statement was approved by the Board of SRG Global Limited on 8 December 2021.

## ABOUT SRG

**SRG Global is an engineering-led global specialist asset services, mining services and construction group built to solve complex problems across the entire asset lifecycle.**

SRG was born out of Australia's greatest ever engineering and construction challenge, the Snowy Mountains Hydro-electric Scheme, in 1961. Today we are an ASX listed company, bringing a unique engineering mindset to every construction, maintenance and mining project we touch.

Head quartered in Subiaco, Western Australia we maintain a permanent presence in major capital cities throughout Australia, New Zealand and the United Arab Emirates.

Our operating model provides our clients with **end-to-end solutions** across their

entire asset lifecycle through a process of engineer, construct, sustain, wherever they be within the world.

Few specialist services companies have amassed the same knowledge, developed as many innovations, or worked on as many world-class projects as we have. As a result, we have some of the best technical minds and problem solvers, supported by a culture that encourages "out of the box thinking" and people working together to push boundaries on what is considered possible.



## OPERATIONS AND SUPPLY CHAIN

### Sustaining complex infrastructure

#### SPECIALIST MAINTENANCE

Highly skilled specialist maintenance services focusing on refractory, oil and gas, industrial assets and transport and marine infrastructure

#### ACCESS SOLUTIONS

Comprehensive structural and technical access solutions targeting the mining and resources, oil and gas, offshore marine, and industrial locations



### Comprehensive ground solutions

#### PRODUCTION DRILL & BLAST

Integrated range of complementary production drill & blast services working across multiple commodities including gold, precious metals, and iron ore

#### SPECIALIST GEOTECH

Highly technical specialist ground and slope stabilisation services for all mining services applications



### Constructing complex infrastructure

#### CIVIL & ENGINEERING

Specialist engineering, post-tensioning, and construction services for complex structures in key markets including dams, bridges, windfarms, and tanks

#### SPECIALIST BUILDING

Specialist monumental façade and structural construction services with repeat, tier one clients





## UNDERSTANDING OUR SUPPLY CHAIN

Our Supply Partners form an integral part of our delivery model.

During the FY21 reporting year, our supplier base consisted of more than 3,000 suppliers primarily domiciled in Australia, with an expenditure more than \$400 million.

Our supply chain is segregated into two categories – **Corporate Vendors** and **Operational Vendors**.

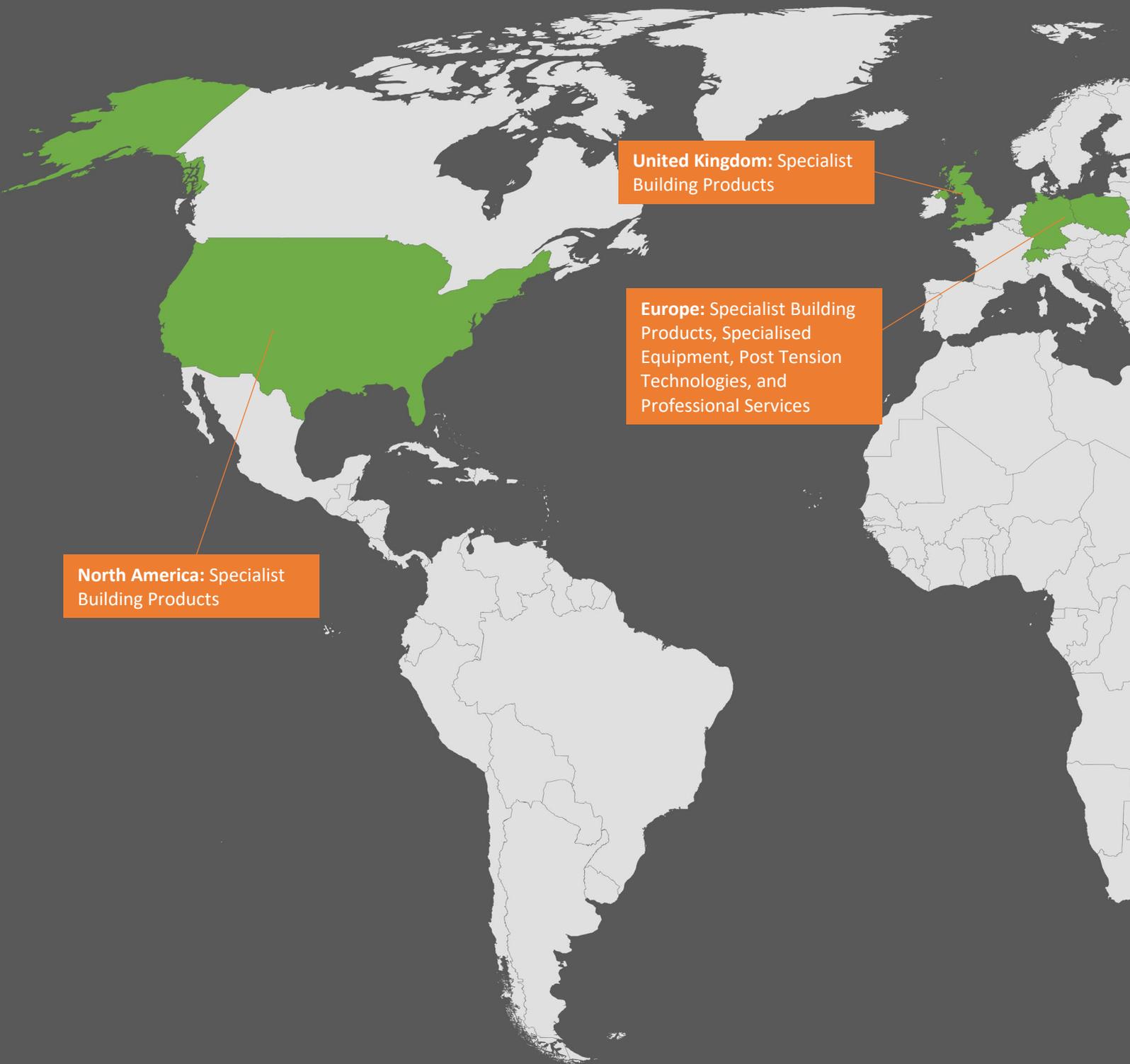
**Corporate Vendors** are categorized as suppliers providing support services to our core functions, including travel, marketing, technology, and office supplies.

**Operational Vendors** are categorized as suppliers who form part of our client delivery model. These include material and product suppliers, subcontractors, labour hire and professional design consultants.



# UNDERSTANDING THE RISK OF MODERN SLAVERY WITHIN OUR SUPPLY CHAIN

Modern Slavery is one of the most heinous forms of human rights abuses, in direct violation of Article I of the Universal Declaration of Human Rights. Debt entrapment, human trafficking, the use of child or forced labour, exploitation of migrant or vulnerable workers and direct slavery highlight examples of Modern Slavery conditions which remain at the forefront of all Supply Partner assessments.



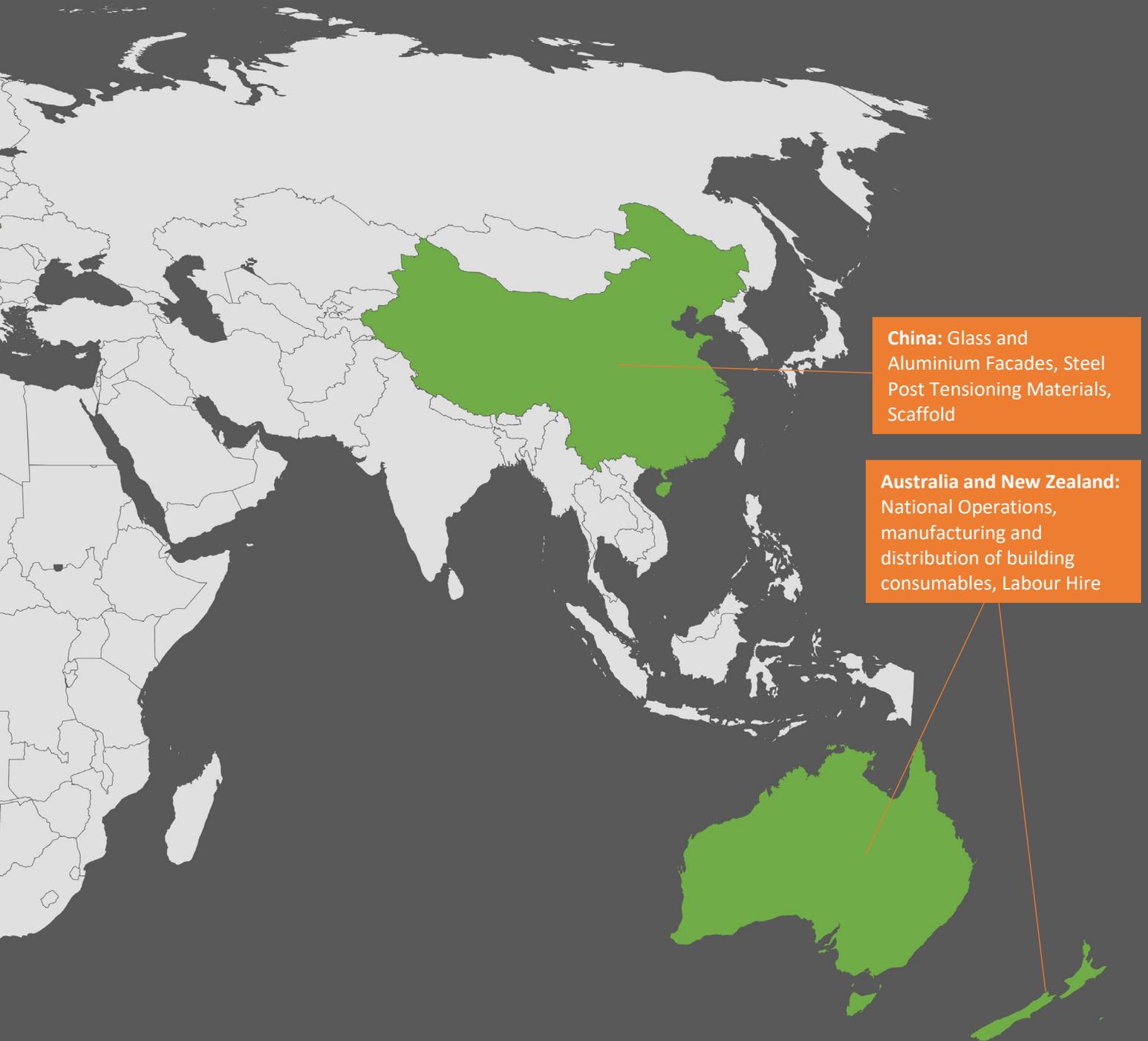
**United Kingdom:** Specialist Building Products

**Europe:** Specialist Building Products, Specialised Equipment, Post Tension Technologies, and Professional Services

**North America:** Specialist Building Products

Whilst we continue to procure most goods and services utilized across our operations from Supply Partners located within Australia, certain manufactured goods are procured from international sources including Asia and Europe.

Using the Global Supply Index (GSI), our supply chain is mapped against the potential risk of modern slavery abuses by geography. In doing so, we can direct attention to high-risk areas within our supply chain as a priority, establishing actions that can be carried across the balance of our Supply Partner network.



## Supply Partner Risk Demographic Profile

The GSI recognises that information utilized to generate the *Global Slavery Index 2018* was conservative with gaps remaining within the data<sup>1</sup>. Bearing this in mind, we continue to work with our Supply Partners within areas of moderate concern to ensure they continue to engage with their workforces.

Least Concern	Moderate Concern	Most Concern
<p><b>Geographies</b></p> <ul style="list-style-type: none"> <li>▪ Australia</li> <li>▪ United Kingdom</li> <li>▪ United States of America</li> <li>▪ Europe</li> </ul> <p><b>Goods, Services and Materials</b></p> <ul style="list-style-type: none"> <li>▪ Building material consumables</li> <li>▪ Labour Hire</li> <li>▪ Professional Services</li> <li>▪ Air Travel</li> <li>▪ Vehicle Hire</li> <li>▪ Office Equipment</li> <li>▪ Electronic Equipment</li> <li>▪ Uniforms and Protective Equipment</li> <li>▪ Software</li> <li>▪ Utilities</li> <li>▪ Office and Warehouse Property</li> <li>▪ Subcontracting Works and Labour</li> </ul>	<p><b>Geographies</b></p> <ul style="list-style-type: none"> <li>▪ China</li> <li>▪ United Arab Emirates</li> </ul> <p><b>Goods, Services and Materials</b></p> <ul style="list-style-type: none"> <li>▪ Façade Materials</li> <li>▪ Specialist Building Products</li> <li>▪ Scaffolding</li> <li>▪ Labour Hire</li> </ul>	<p><b>Geographies</b></p> <p>No products currently sourced from areas of high concern</p> <p><b>Goods, Services and Materials</b></p> <p>No products currently sourced from areas of high concern</p>

As part our ongoing due diligence process, in person Supplier Reviews were completed on our **Facades Supply Partner** (2018) and **Scaffold Supplier** (2019). These assessments were to determine compliance against:

<b>Materials Sourcing</b>	Procurement process utilized by the Supply Partner in sourcing raw and finished materials for incorporated into any final products.
<b>Quality Controls</b>	A review of the quality and compliance procedures utilized by the Supplier in the manufacturing process.
<b>Workplace Environment Amenities</b>	The conditions of the workplace including cleanliness, availability of employee amenities and availability of protective personal protective equipment.

<sup>1</sup> Walk Free Foundation, A 2018, *The Global Slavery Index 2018*, p. 27.

## Modern Slavery in SRG's Internal Operations

Our global workforce of more than 2,000 skilled, multi-disciplined individuals work seamlessly with our network of Supply Partners to deliver solutions to complex problems.

As with our Supply Partners, our operations are mostly concentrated within Australia and New Zealand, broken into two primary groups – **Corporate** and **Operational**.

All direct corporate employment contracts meet as a minimum the entitlements as set out within the *National Employment Standards*.

Operational employment contracts are a mixture between salaried workforce and those covered by Enterprise Agreements (**EA**) or other industrial agreements. SRG continues to work cohesively with union representatives and employees in the development of fair and equal EA's supporting the industries we participate within.

Our indirect workforce, such as labour hire personnel, are engaged through recognised employment agencies under a direct contract with SRG.

## COVID-19 Response and Management

As Covid-19 continues to change the dynamics of how we work, SRG proactively engaged with staff to develop a work from home program for Corporate and certain non-manual Operational employees which included additional resourcing and workplace ergonomic self-assessments.

Central to the program was the health and wellbeing. The potential for over-work was identified during periods of extended lockdowns in Victoria and New South Wales, with support and mental health activities initiated by business unit leaders.

Front line Operational employees working on project sites were consulted regularly on any adjustments to their working conditions which were being driven by government directives. It was these Government (and Principal) directives guided our response process.



## MANAGING OUR MODERN SLAVERY RISKS

Leadership starts with ownership. We are committed to the development of a sustainable future, built upon the appropriate management of economic, environmental, and social risks and opportunities that are encountered across our operations.

We are smarter together and together we can create change for the better.

Ownership of our economic, environmental, social and governance (EESG) risks forms part of our wider risk management framework overseen by our Executive Leadership Team (ELT) as delegated to by the Board.

The ELT then in turn work with our wider business unit leaders to develop and implement strategies to manage our exposures to EESG risks using **Governance Policies and Procedures**.



Our **Code of Conduct (Code)** underpins our core values as a Company including those to which our Employees and Supply Partners are to follow when working for or engaging with SRG. The Code is supplemented by a suite of policies, standards and procedures that collectively create our Corporate Governance Framework.

The use of slavery throughout our operations, including that of our Supply Partners is prohibited in all forms. Our Code explicitly addresses the use of modern slavery, in that our Supply Partners must not:

- Use any form of forced, bonded, compulsory labour, slavery or human trafficking;

- Require the surrender of any government issued identification, passport, work permit or other personal document as a condition of employment; or
- Pay employers or agents recruitment or any other fee for their employment.

In addition to our Code, our **Sustainability, Diversity and Inclusion, Health Safety Environment & Quality** and **Whistleblower** policies affirm our commitment to the creation of a future for all by encouraging:

- The appropriate development and management of economic, environmental, and social risk opportunities
- Constructive engagement with communities to achieve a lasting outcome
- Fair and reasonable opportunities for local suppliers and workers to participate in projects and other activities that enable the sharing of economic benefit
- Our Employees and those of our Supply Partners to speak up when they identify actions or behaviours that do not reflect our Beliefs and Values
- Education and training to our teams and others that drive inclusive behaviours
- Engaging with stakeholders, where appropriate, to develop or introduce sustainable practices that eliminate, minimize, or mitigate adverse impacts.

All Supply Partners are required to familiarize themselves with the terms of Code and Policies. Where non-compliance to our Code is identified, our terms and conditions permit us to terminate any ongoing relationship.

## MEASURING EFFECTIVENESS AND SUCCESS

During the FY21 reporting period, SRG undertook a revitalization of our risk management strategy to continue meeting the needs of SRG as continue to grow for the future.

As a company, we remain highly exposed to operational risks. Our revenues are delivered from our people and Supply Partners and with this in mind, the Risk Team unanimously agreed Zero Harm remains our highest ranked risk.

For SRG, Zero Harm is not only ensuring our people returning home safely at the end of each day. It includes Zero Harm to the workforce of our Supply Partners, stakeholders, the environment, and community.

### Zero Harm in our Supply Chain

To determine how effectively we are managing Modern Slavery risks within our operations, we first needed to establish a baseline of the existing controls in force. The metrics we used to establish this baseline included:

- A maturity assessment of our existing governance framework
- Mapping our modern slavery risk exposures against our supplier profile
- Modern Slavery awareness assessments

### Assessment Outcome

Our governance framework provides a strong foundation for how we continue to manage our operational risks, however further opportunities to improve how we engage with and educate our workforce and Supply Chain partners were identified.

As a result of the baseline assessment the following actions were developed for the FY21 reporting period with our progress identified in the righthand column:

Action	FY21 Progress
Adoption of the Walk Free Foundation Supplier Assessment Tool	Completed
Number of strategic Supply Partners identified	34
Supply Partners identified as potentially using forced labour	0
Number of reports raised through Whistleblower Policy	0
Number of Senior Manager completing Modern Slavery Awareness Training	48
Development and rollout of Supplier Onboarding and Management Procedure	80%
Establishment of FY22 Actions	Completed

## 2022 AND BEYOND

**Progress is not measured solely by the steps we have taken so far, but the path we lay ahead of us. As we have taken proactive steps to better understand and assess the risks of modern slavery within our operations, our next step is to create an integrated culture of awareness among our workforces.**

As we progress through the FY22 Reporting Period our core objectives over the next 12 months and beyond will include:

### **Introducing a Supplier Code of Conduct**

We are a values driven business and we expect our partners to live up to the values we hold ourselves accountable to.

### **Creation of a Procurement Hub**

Establishment of a centralized location for suppliers to register themselves, obtain information including our proposed Supplier Code of Conduct and receive information.

### **Workforce Education**

Continue educating our existing workforce and new starters through an online training package focused on how human rights are managed within SRG.

## APPENDIX A – SRG GLOBAL REPORTING ENTITIES

Business Name	Country of Incorporation	ABN
SRG Global Limited	Australia	81 104 662 259
SRG Global (Australia) Limited	Australia	57 006 413 574
SRG Global Corporate (Australia) Pty Ltd	Australia	57 006 413 574
SRG Global IP Pty Ltd	Australia	90 603 046 331
SRG Global International Holdings Pty Ltd	Australia	ACN622487094
SRG Global Building (Northern) Pty Ltd	Australia	87 076 604 281
SRG Global Building (Southern) Pty Ltd	Australia	48 087 344 349
SRG Global Building (Western) Pty Ltd	Australia	78 087 396 772
SRG Global Services (Australia) Pty Ltd	Australia	40 111 102 240
SRG Global Services (Western) Pty Ltd	Australia	71 145 854 360
SRG Global Civil Pty Ltd	Australia	31 083 214 439
SRG Global Mining (Australia) Pty Ltd	Australia	45 006 132 823
SRG Global Products Pty Ltd	Australia	80 120 405 334
SRG Global Structures (WA) Pty Ltd	Australia	41 008 946 469
SRG Global CASC Formwork Pty Ltd	Australia	98 140 773 388
SRG Global Structures (Vic) Pty Ltd	Australia	53 618 291 277
SRG Global Assets Pty Ltd	Australia	85 104 662 213
SRG Global Industrial Services Pty Ltd	Australia	81 128 921 344
SRG Global Integrated Services Pty Ltd	Australia	86 604 010 639
SRG Global Investments Pty Ltd	Australia	32 105 746 656
SRG Global Facades Pty Ltd	Australia	25 604 493 174
SRG Global Facades (Vic) Pty Ltd	Australia	47 606 869 014
SRG Global Facades (NSW) Pty Ltd	Australia	97 602 257 929
SRG Global Facades (Qld) Pty Ltd	Australia	87 602 258 257
SRG Global Facades (WA) Pty Ltd	Australia	80 602 257 858
SRG Global CASC Pty Ltd	Australia	98 140 773 338
CASC Contracting Pty Ltd	Australia	53 636 127 756
SRG Global Facades (Western) Pty Ltd	Australia	80 602 257 858
SRG Global Structures (Vic) Pty Ltd	Australia	53 618 291 277
Red Ore Drill and Blast Pty Ltd	Australia	16 830 355 839
SRG Employee Share Trust	Australia	60 202 572 201

[srgglobal.com.au](http://srgglobal.com.au)

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**MAKING  
THE  
COMPLEX**  

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**SIMPLE**