



RESPECTING HUMAN RIGHTS

2022 JOINT MODERN SLAVERY STATEMENT

Reporting period: 1 January 2022 - 31 December 2022

CIMIC Group respects human rights.

The UN Guiding Principles on Business and Human Rights, the UN Global Compact, the UN Sustainable Development Goals and the International Labour Organisation's standards inform our approach to managing the risk of modern slavery in our operations and supply chain.

Acknowledgement of Country

CIMIC Group respects and acknowledges the history and contributions of all local communities, including Traditional Owners and First Nation peoples. Across our locations, we recognise and value our responsibility to live and work on country, and with communities, respectfully and with care.

Cover image: **METRONET**, Western Australia, CPB Contractors
This page: **Kaban Green Power Hub**, Queensland, UGL

Our 2022 Modern Slavery Statement can be read in conjunction with our reporting suite and key resources which are available at cimic.com.au.



CIMIC Group Limited

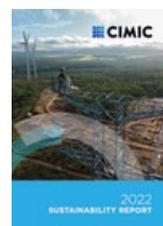
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STATEMENT DEVELOPMENT AND APPROVAL SUMMARY

This is CIMIC Group's third modern slavery statement and our first as a fully owned subsidiary of HOCHTIEF Australia Holdings Limited (**HOCHTIEF Australia**).¹ CIMIC was removed from the Official List of the Australian Securities Exchange at the close of trading on Wednesday, 11 May 2022 under Listing Rule 17.14, following compulsory acquisition of its remaining securities by HOCHTIEF Australia. HOCHTIEF Australia is fully owned by HOCHTIEF Aktiengesellschaft (**HOCHTIEF AG**).

CIMIC Group's Modern Slavery Statement for the period 1 January 2022 to 31 December 2022 has been prepared as a joint statement in consultation and collaboration with HOCHTIEF Australia and our Operating Companies CPB Contractors Pty Ltd, Leighton Asia Limited, Broad Construction Pty Ltd, UGL Pty Ltd, Sedgman Pty Ltd, Pacific Partnerships Pty Ltd, Devine Pty Ltd, Leighton Properties Pty Ltd and EIC Activities Pty Ltd, and is made pursuant to sections 14 and 16 of the *Modern Slavery Act 2018* (Cth).

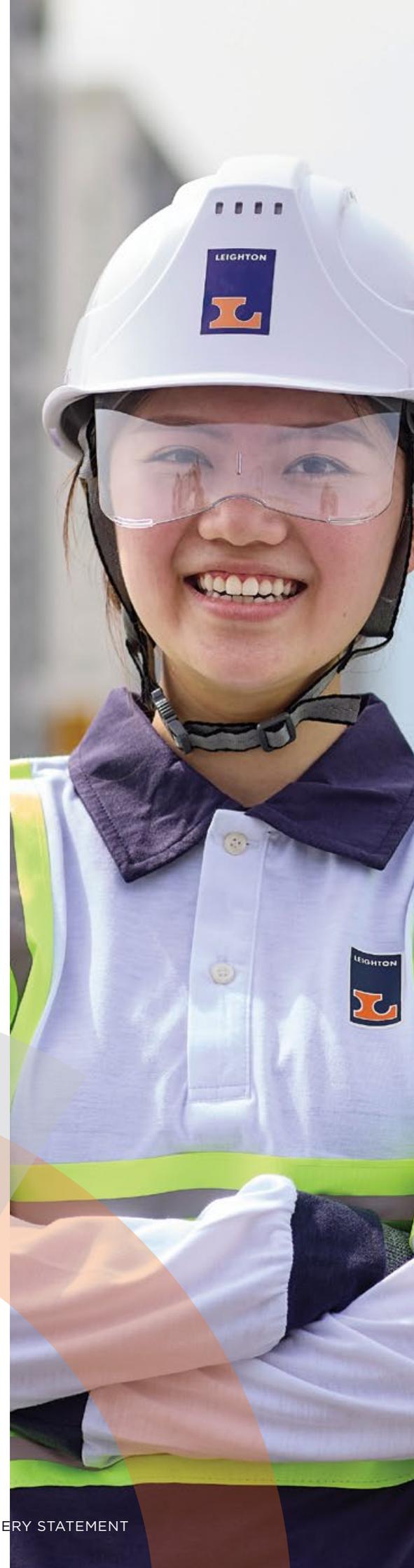
Preparation of this Modern Slavery Statement has been managed by a CIMIC working group integrating team members from the People, Procurement, Risk, Legal, Compliance, Sustainability and Communications functions. The Operating Company members of the Modern Slavery Committee have implemented and verified the year's modern slavery prevention activities and contributed data for this statement.

For the purpose of this statement CIMIC Group² refers collectively to all the reporting entities and their controlled entities.

This statement has been reviewed and approved by the Board of HOCHTIEF Australia, the Board of CIMIC Group Limited, the Executive Chairman and Chief Executive Officer of CIMIC Group Limited, and the Managing Directors of each of our businesses listed above.

¹ HOCHTIEF Australia's only business is the holding company of CIMIC Group on behalf of HOCHTIEF AG.

² In this report a reference to 'CIMIC Group', 'the Group', 'CIMIC', 'we', 'us' or 'our' is a reference to CIMIC Group Limited 57 004 482 982 and certain entities that it controls unless otherwise stated.



HUMAN RIGHTS AND SUSTAINABLE DEVELOPMENT

Our team of around 25,500 people share one purpose – to have a lasting positive impact on the people and places we serve.

We use our capabilities to deliver sustainable solutions. Our projects include rail and road networks, power and water utilities, renewable energy, essential resources, housing, hospitals, and schools. These are supporting communities and creating work and economic activity in around 20 developed and developing countries.

How we work is as important as what we plan, design and deliver.

Operating ethically, with a responsible supply chain, is fundamental to sustainable development.

Standing up for human rights, fair treatment of all people and the environment, and standing against corruption and exploitation, is essential to optimise and share project benefits for a better, fairer future.

Modern slavery exploits vulnerable and impoverished people, and we reject it wholeheartedly.

This statement describes how we embed a disciplined approach, across our Operating Companies, to identify, mitigate and prevent the risk in our operations and supply chain.

In 2022, our Code of Conduct, governance framework, control systems, and two Human Rights Impact Assessments (part of our HRIA program, commenced in 2017) continued to drive consistent due diligence and compliance across our employment and procurement practices.

Our training programs embed our Code of Conduct and build our team's awareness and skills to identify and report modern slavery risks. This year 6,215 team members completed Code of Conduct training. More than 9,500 of our people have now completed modern slavery awareness training since its introduction in 2020.

Employing and training local people builds skills and community capacity. In 2022, 93.7% of our people were employed locally. Of the 18,472 suppliers we worked with during the year, 95% were local to our projects and all were assessed for human rights and other risks.

Respect for human rights is the cornerstone of truly sustainable development that protects the environment, lifts communities, and builds an enduring positive legacy for future generations.



A handwritten signature in white ink, appearing to read 'Juan Santamaria'.

Juan Santamaria

Executive Chairman CIMIC Group
Chief Executive Officer of HOCHTIEF
Chief Executive Officer of ACS Group



Inland Rail South Civil Works, New South Wales, CPB Contractors

1. ASSET, INFRASTRUCTURE AND RESOURCES LEADER

CIMIC Group is an engineering-led construction, mining, services and development and investment leader working across the lifecycle of assets, infrastructure and resources projects.

In 2022, for the purpose of the joint modern slavery statement CIMIC Group is reporting on the operations and supply chains of the following entities, HOCHTIEF Australia, CIMIC Group, CPB Contractors, Leighton Asia, Broad, Sedgman, UGL, Pacific Partnerships, Devine, Leighton Properties and EIC Activities.³

Our main Operating Companies are incorporated in Australia, apart from Leighton Asia which is incorporated in Hong Kong.

Our mission is to generate sustainable returns by delivering projects for our clients while providing, safe, rewarding and fulfilling careers for our people.

With a history dating back to 1899, the CIMIC Group is working across developed and developing economies and we strive to be known for our principles of Integrity, Accountability, Innovation and Delivery, underpinned by Safety.



CIMIC Group structure

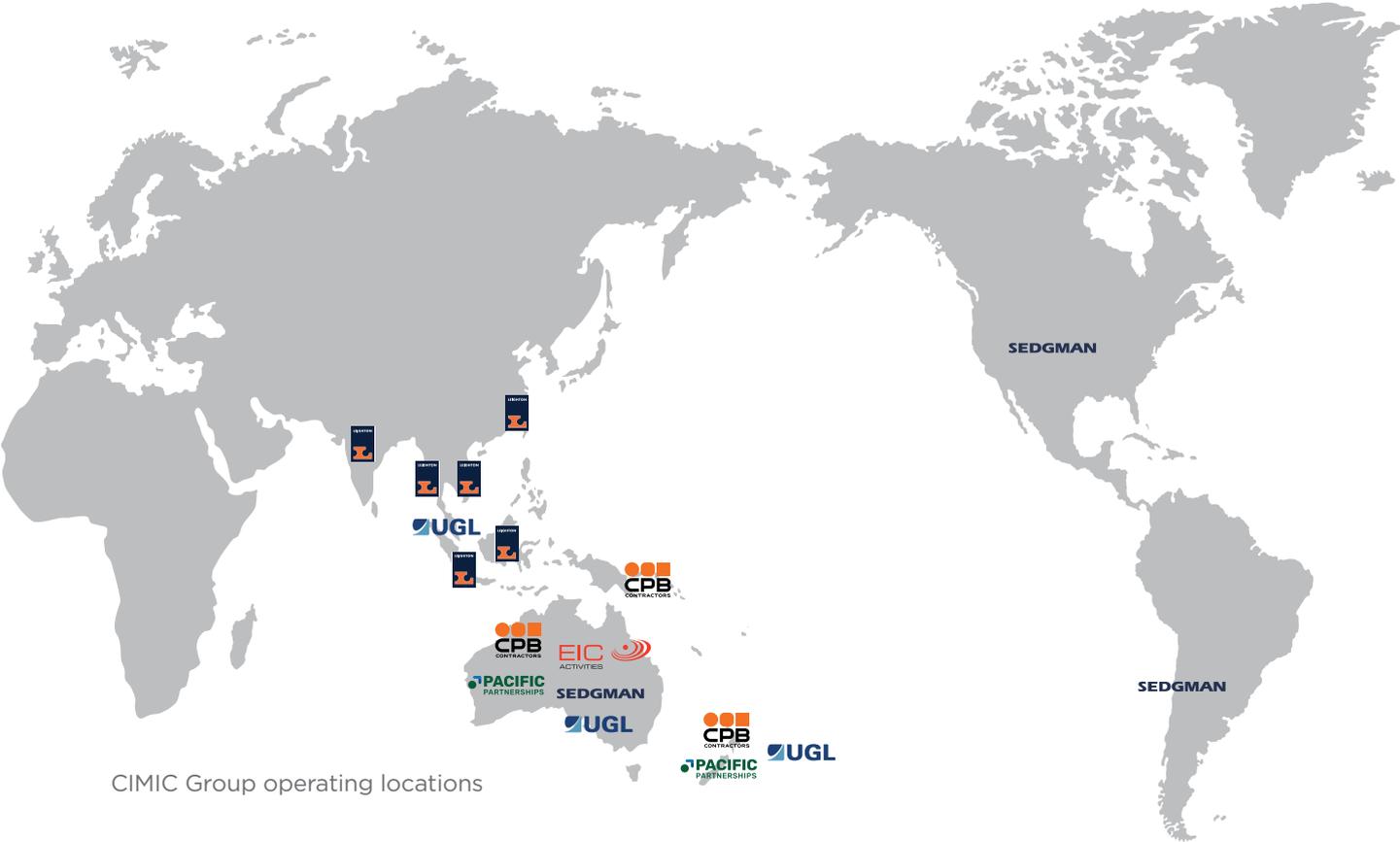
³ CIMIC has investments in Thiess, one of the largest mining service providers in Australia, and in Ventia, an ASX listed entity which is one of the largest infrastructure services providers in Australasia. Each provides its own separate statement. This Statement covers CIMIC's controlled entities, including Devine Group and Leighton Properties. The Group also has investments and interests in a number of other associated companies, joint ventures and other non-controlled operations which are not included for the purposes of this Statement.



2. OUR OPERATIONS AND SUPPLY CHAIN

Bringing our Operating Companies' diverse capabilities together to offer integrated solutions differentiates our Group. We provide clients with a whole-of-life offering from feasibility, design, planning and investment;

to manufacturing and construction; to operations, maintenance, upgrades and asset management; to rehabilitation and decommissioning.



CIMIC Group operating locations

OPERATIONS



CPB Contractors

CPB Contractors is a leading international construction contractor with operations spanning Australia, New Zealand, Asia and Papua New Guinea. The team delivers major projects spanning all key sectors of the construction industry, including roads, rail, tunnelling, defence, building and resources infrastructure.



Broad

CPB Contractors includes the fully-owned subsidiary Broad, a trusted managing contractor within the Australian building industry, delivering new build, fit-out and refurbishment projects.



Leighton Asia

Leighton Asia is the contractor behind some of Asia's most prestigious projects. Established in 1975, headquartered in Hong Kong, Leighton Asia delivers a portfolio of high-profile infrastructure projects throughout Asia.



Sedgman

Sedgman is a leading provider of integrated minerals processing solutions. With a track record in successful project and operations delivery, Sedgman is focused on realising value for clients through excellence in engineering and innovative solutions.



UGL

UGL is a market leader in end-to-end asset solutions. The team's whole-of-life offering delivers operational value and enhanced customer experiences for critical assets in power, renewables, water, resources, telecommunications, transport, defence and security, and social infrastructure.



Pacific Partnerships

Pacific Partnerships is a leading infrastructure developer. The team drives innovative collaboration across CIMIC Group's collective expertise to create, fund, own, deliver and operate sustainable solutions that unlock benefits for our communities and for the future.



EIC Activities

EIC Activities is CIMIC Group's engineering and technical services business, providing a competitive advantage for profitable projects that generate value for clients.

SUPPLY CHAIN

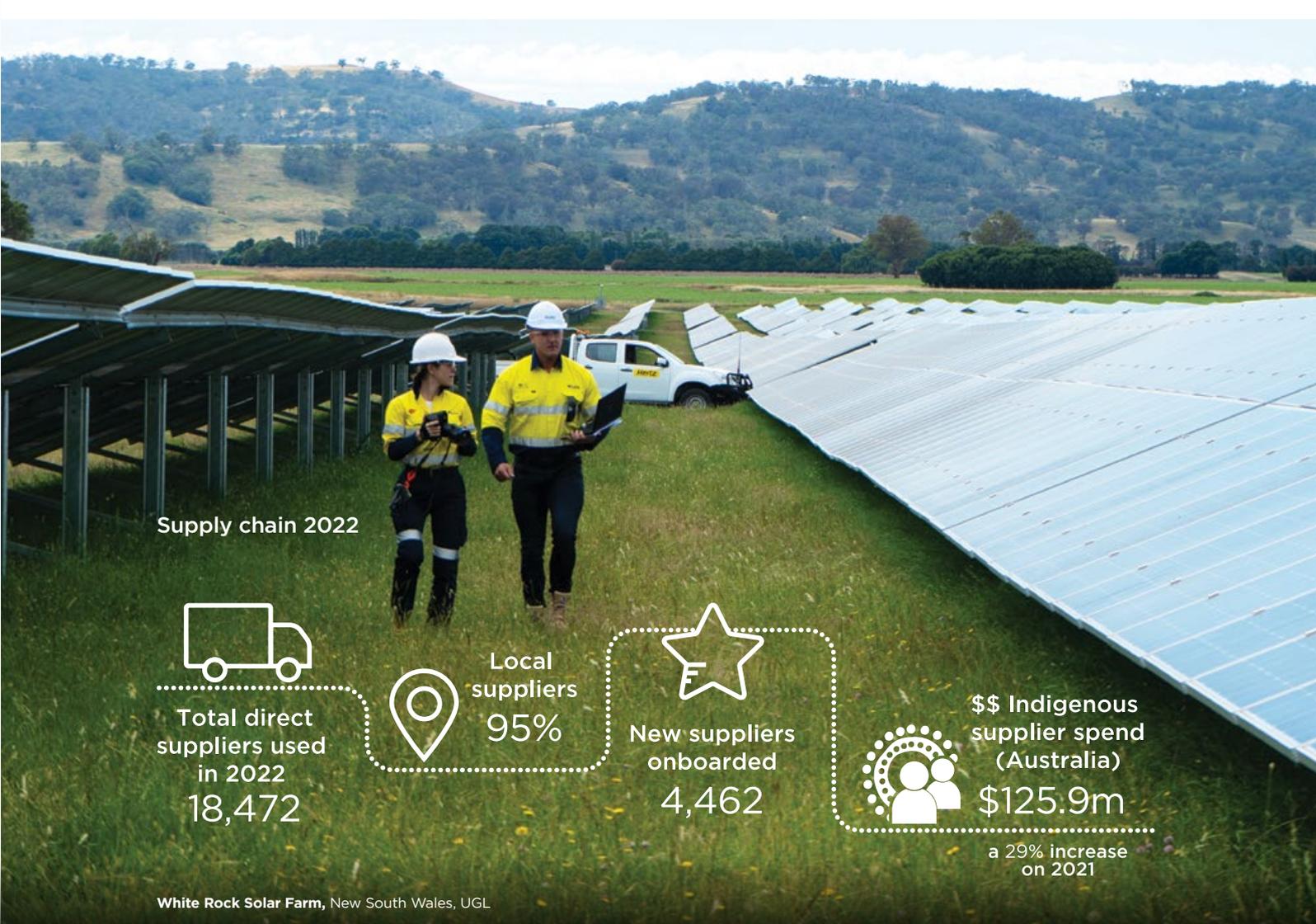
In 2022, CIMIC Group has worked with 18,472 direct domestic and international suppliers with key areas of spend including:

- materials such as concrete, steel, piping and asphalt
- industrial/engineering consumables such as fuel, lubricants, abrasives, adhesives and sealants
- rail componentry and rolling stock
- major plant and equipment such as tunnel boring machines, and mineral processing equipment
- personal protective equipment (PPE)
- subcontractors such as electricians, plumbers, glaziers, steel fixers and other tradespeople
- labour hire
- insurance
- professional services
- technology and telecommunications.

We typically source products and services from suppliers or subcontractors. The products and services we procure are those used in development, design, financing, construction, operations and maintenance, and management of projects and the related corporate functions.

We generally do not manufacture our own products except where CPB Contractors produces precast concrete components for construction projects or where UGL manufactures, upgrades and maintains rolling stock and some rail specific componentry in Australia. Parts may be sourced locally or imported.

Our procurement of services includes activities that relate to corporate support such as facilities and maintenance, accounting, legal and IT services, and professional consulting services such as design and engineering, all of which complement our own internal resources for either short or long-term engagements as required.



Supply chain 2022



White Rock Solar Farm, New South Wales, UGL

3. UNDERSTANDING OUR MODERN SLAVERY RISKS

We recognise that in delivering assets, infrastructure and resources projects, both in Australia and internationally, we operate in some markets with supply chains that may have an elevated exposure to the risk of modern slavery, and this demands a high degree of vigilance in meeting our obligations.

Our understanding of the drivers, vulnerable groups and the hidden but pervasive presence of modern slavery, and our approach to addressing it, has been informed by the UN Guiding Principles on Business and Human Rights, the UN Global Compact, the UN Sustainable Development Goals and the International Labour Organisation's standards. Our insight has also been facilitated by the Global Slavery Index (GSI) published by Walk Free, our ongoing program of Human Rights Impact Assessments (HRIA), which commenced in 2017, use of our third party screening tool and on-going supply chain risk assessments.

Modern slavery risks can be present in the construction, mining, minerals processing, heavy manufacturing and maintenance sectors in which we operate. These risks may present as exploitative practices such as debt bondage, child labour, forced labour and human trafficking, as detailed below, and may be heightened in some of the jurisdictions in which we operate.

OPERATIONS RISK

Complementing CIMIC Group's proactive governance and due diligence (see section 4), we use HRIAs to extend our identification and understanding of human rights and modern slavery risks in our operations.

Our HRIA practice has been refined over a number of years. CIMIC Group has prioritised identifying and addressing modern slavery risks in geographies where we have a significant workforce.

We have undertaken HRIAs in our construction operations in India (2017), the Philippines (2019), Papua New Guinea (2020), and Hong Kong (2021); and our minerals processing business assessed a China based supplier (2021). In 2022, HRIAs were initiated for construction operations in Western Australia and services operations in Victoria. More detail about our HRIA program is set out in section 4.

SUPPLY CHAIN RISK

The Group procures goods and services from Australia and internationally.

Certain goods and low skilled services have a higher risk of modern slavery. These can include the production of garments, apparel, and PPE; the supply of raw materials, electronic products and steel fabrication; and the provision of certain services including labour hire, cleaning, freight and logistics.

We remain committed to refraining from purchasing 'at risk' goods and services and inadvertently contributing to modern slavery. We do this in part through our due diligence processes which include supplier screening and using a suite of template commercial contracts with indirect supplier controls. These are detailed in section 4.

ENVIRONMENTAL SCANNING - 2022

Monitoring external and internal environments to support risk awareness and mitigation

Given the diversity and breadth of CIMIC Group's geographies and markets, we monitor for a wide range of risks that have the potential to materially impact our operations, people, and reputation; the environment and communities in which we work; and the financial prospects of the Group.

In 2022, we continued to review and assess our human rights risk profile, leveraging our Human Rights Country Analysis which was conducted in collaboration with HOCHTIEF AG.



Byerwen mine,
Queensland, Sedgman



HUMAN RIGHTS COUNTRY ANALYSIS

Independent criteria-based review of countries where we operate

The human rights country analysis, established in collaboration with HOCHTIEF AG in 2021, was led by an independent agency.

The analysis assessed the level to which human rights are protected, promoted, and respected, in each country where CIMIC operates, specifically analysing:

- Protection – human rights protection offered by government and institutions
- Promotion – legal human rights due diligence requirements applicable to companies, the legislation in force and the voluntary framework on business and human rights
- Respect – the most vulnerable human rights issues.

Each country was assessed against 12 criteria, under the following frameworks, conventions, and indexes:

- United Nations Human Rights Framework
 1. Ratification of United Nations Treaties
 2. Presence in United Nations Committees
 3. Reporting to the United Nations Committees
- International Labour Organisation
 4. Ratification of ILO Fundamental Conventions
- Regional Human Rights Framework
 5. Regional Systems of Human Rights
- National Human Rights Indexes
 6. Fragile States Index
 7. Corruption Perception Index
 8. Modern Slavery Index
 9. Death Penalty Index
 10. Average Working Hours (ILO)
 11. Global Gender Gap Ranking 2020
 12. Global Rights Index 2021.

The analysis has provided deeper insight into the human rights landscape associated with each country's political, social, and economic context; legal requirements for businesses' human rights due diligence; and main human rights risk factors. This information supports our relevant managing functions in developing appropriate controls to prevent, mitigate or respond to each risk.

CORONAVIRUS (COVID-19)

Protecting our people and communities

With the outbreak of the pandemic in 2020 CIMIC put plans and protocols in place across the Group and has continued to monitor the situation and update its responses both domestically in Australia and internationally.

Our focus in 2022 remained on caring for our people, working safely, and continuing to deliver essential infrastructure and services to communities who continue to rely on us.

At our project sites, we continued to apply prevention activities, where required, which included limiting the size of toolbox and prestart meetings to achieve social distancing, increasing hygiene and cleaning practices, splitting rosters, staggering meal breaks, and start and finish times. We also established teams to manage the continuity of our operations. The rigorous implementation of these controls and our protocols has minimised impacts to the delivery of projects and our supply chain, and supplied our teams with the resources and information required to respond quickly with localised initiatives as the situation evolves.

We continue to recognise that COVID-19 can escalate the risk of modern slavery. We remain committed to using our integrated and proactive risk management approach for identifying, preventing, and mitigating the potential for modern slavery in our diverse operations and international supply chain, and being ready to address any impacts which may occur.

Meeting local needs

In one example, to maintain our people's well-being and in support of the Indonesian Government's ongoing program for reducing COVID-19, Leighton Asia purchased over 700 COVID-19 vaccines for our JKT05 Data Centre project team.

In collaboration with BIDOKEs, the Medicine and Health Sector of the Indonesia Police Department, a vaccine program was conducted. Personnel of Leighton Asia and the project's sub-contractor employees will have their official COVID-19 status updated to include their recently administered third vaccine.

This third vaccination program was welcomed by all involved personnel. Knowing that their immunity to COVID-19 was strengthened, this effectively provides a safe working environment for our people and those under our care.

With COVID-19 plans, protocols and ongoing monitoring in place, our teams remain equipped to respond quickly with localised initiatives as required, putting care for people first.

Our approach includes consideration of modern slavery risks and is supported by CIMIC's governance framework and controls.

Western Sydney International (Nancy-Bird Walton) Airport,
New South Wales, CPB Contractors



4. ASSESSING AND ADDRESSING THE RISKS OF MODERN SLAVERY

OUR INTEGRATED APPROACH

To assess and address modern slavery risks CIMIC Group leverages its governance, compliance, procurement and people frameworks, to ensure we apply a consistent and disciplined approach across our Operating Companies.

These mature and integrated frameworks provide a range of cohesive levers for consulting and aligning our businesses, managing risk, assessing performance and engaging our people and suppliers – including an open, confidential and responsive grievance and reporting mechanism.

Our approach, due diligence and assurance are facilitated by collaboration between specialist functions in the parent company, CIMIC, and our Operating Companies including People, Procurement, Risk, Legal, Compliance, Internal Audit, Sustainability and Communications.

To enhance our ability to identify, mitigate, and prevent the risk of modern slavery, and respond to any impacts should they occur, we work through a cycle of action, evaluation and critical analysis, and remediation.

From this we use evidence-based assessments of our practices and new initiatives to inform our planning and continual improvement steps.

	GROUP ALIGNMENT	RISK AND PERFORMANCE MANAGEMENT	ENGAGEMENT AND CONTINUOUS IMPROVEMENT
 GOVERNANCE	<ul style="list-style-type: none"> • Principles • Code of Conduct • Board and Committees • Policies and procedures 	<ul style="list-style-type: none"> • Risk management framework • Management systems • Board Committee Charters • Group Governance System 	<ul style="list-style-type: none"> • Business Conduct Representative • Reportable Conduct Group • Board Audit and Risk Committee (up to May 2022) • Board Ethics, Compliance and Sustainability Committee • Ongoing liaison with Government, industry and regulators
 COMPLIANCE	<ul style="list-style-type: none"> • Policies relevant to modern slavery issues, such as: <ul style="list-style-type: none"> › Approval to operate Internationally Policy › Modern Slavery Policy › Modern Slavery Protocol › Sustainability Policy › Health and Safety Policy › Whistleblower Policy › Anti-Bribery and Corruption Policy › Gift and Hospitality Policy › Compliance Policy • Compliance Working Group • Modern Slavery Committees 	<ul style="list-style-type: none"> • Annual compliance audit • Internal audit • Board Audit and Risk Committee review (up to May 2022) • Board Ethics, Compliance and Sustainability Committee review 	<ul style="list-style-type: none"> • Grievance and reporting mechanism <ul style="list-style-type: none"> › Group Code of Conduct – Management, Monitoring and Reporting Procedure › Business Conduct Representatives and Reportable Conduct Groups at CIMIC and Operating Company levels › Independent Ethics Line
 PROCUREMENT	<ul style="list-style-type: none"> • Dealing with Third Parties Policy • Procurement Policy 	<ul style="list-style-type: none"> • Supplier registration • Supplier screening tool and onboarding • Third Party Anti-Bribery, Corruption and Business Integrity Declaration • Template commercial contracts 	<ul style="list-style-type: none"> • Supplier access to grievance and reporting mechanism • Independent Ethics Line
 PEOPLE	<ul style="list-style-type: none"> • People policies including <ul style="list-style-type: none"> › Recruitment Policy, procedures and management systems › Workplace Behaviour Policy › Anti-Bullying, Harassment and Discrimination Policy › Diversity and Social Inclusion Policy › Flexible Working Policy › Parental Leave Policy › Family and Domestic Violence Policy › Redundancy Policy 	<ul style="list-style-type: none"> • Human Rights Impact Assessments • People policies audit 	<ul style="list-style-type: none"> • Education and training <ul style="list-style-type: none"> › Code of Conduct › Compliance › Leadership › Modern slavery › Equal employment opportunity, antibullying, harassment and discrimination • Reporting and grievance frameworks

Key elements of CIMIC Group's integrated approach to assessing and addressing modern slavery risks.

Governance and leadership

Our governance framework is founded in our Principles of Integrity, Accountability, Innovation and Delivery, underpinned by Safety. These Principles guide all of the Group's activities and form the basis of our Code of Conduct which sets the standard of behaviour we expect from all our employees, sub-contractors and partners.

Where the Code of Conduct or a policy sets higher standards of behaviour than local laws, rules, customs or norms, the higher standards apply.

Our Code of Conduct rejects all forms of modern slavery including, but not limited to, the trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage and deceptive recruiting for labour and services. We do not tolerate child labour or any form of exploitation of children or young people and commit to complying with the International Labour Organisation (ILO) with respect to under-age workers.

Whilst ultimate accountability rests with the Board, our governance framework delegates the management thereof to Board Committees and senior management, under the leadership of the Chief Executive Officer. We have a comprehensive series of policies, procedures, frameworks and guidelines relating to corporate governance, ethics, and financial and risk management in place across our operations to provide overall operating parameters for our entities.

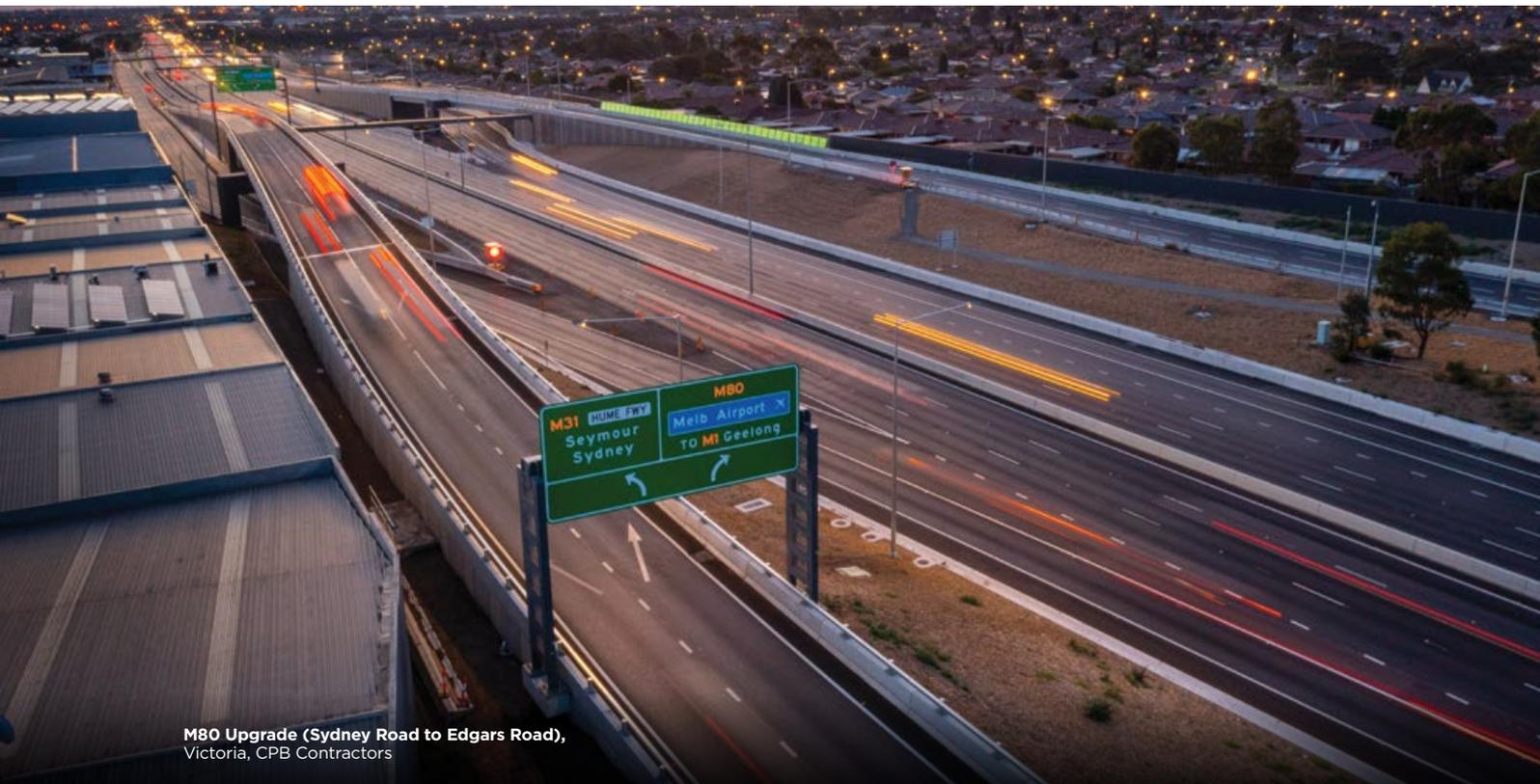
Managing risk is a critical element of the Group's overall business strategy and has been a key contributor to our success. Our risk management framework⁴ is tailored to our business, embedded largely within existing processes and aligned to our objectives, both short and longer term.

Our Operating Companies leverage advanced management systems to drive repeatable excellence. Where relevant, we work on shared platforms and processes, underpinned by shared policies, to create efficiency and consistency.

Compliance

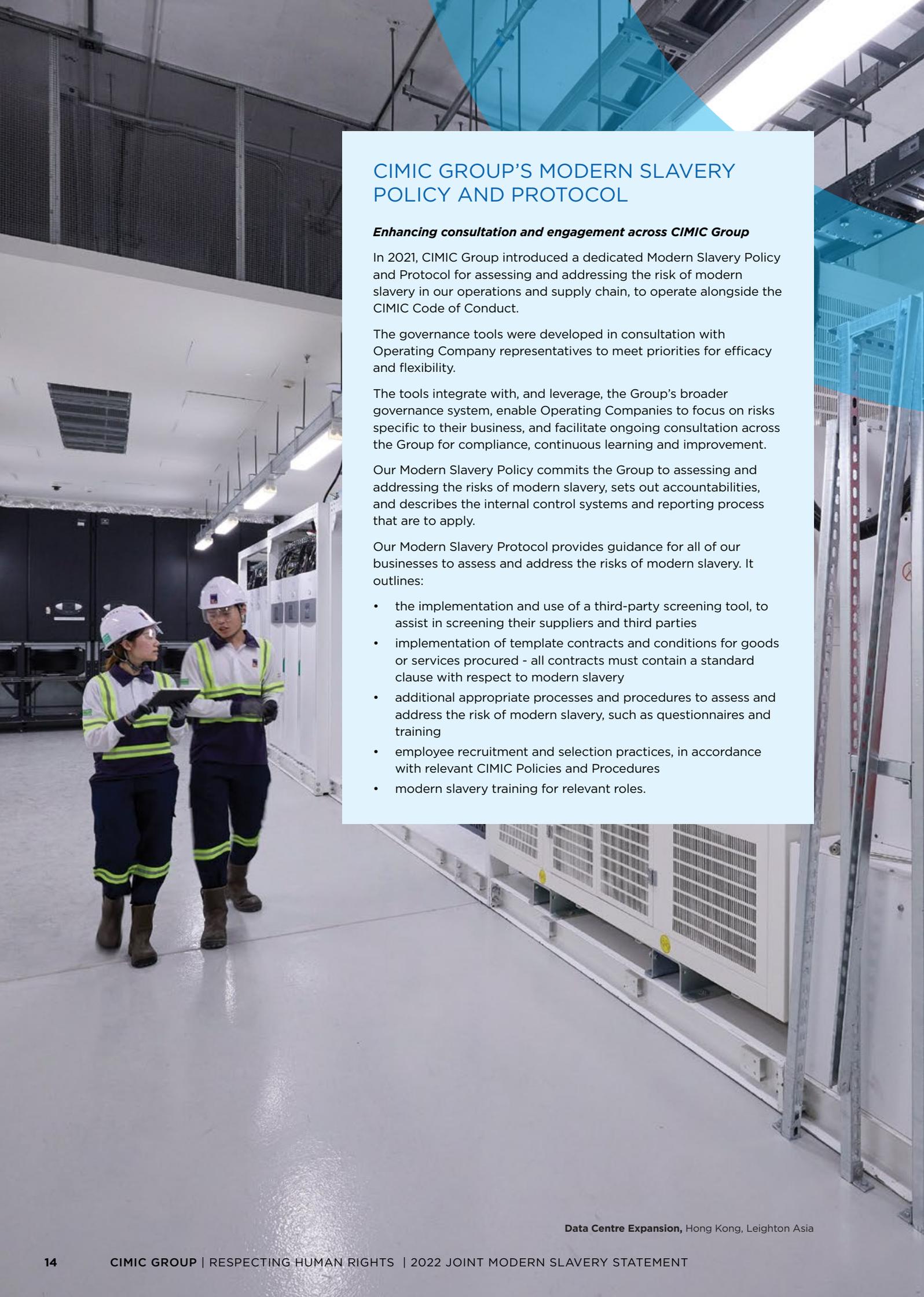
Our compliance, due diligence and internal audit framework engages our businesses on their compliance obligations - including the requirements stated in our Code of Conduct and policies such as Modern Slavery Policy, Anti-Bribery and Corruption Policy, Dealing with Third Parties Policy, Group Procurement Policy, Health and Safety Policy, Workplace Behaviour Policy and Whistleblower Policy.

Our Modern Slavery Policy, introduced in 2021, facilitates the Group's ongoing consultation and consistent due diligence in assessing and addressing modern slavery risks. The Policy, and its supporting Protocol, set shared minimum requirements for planning, control systems, reporting and engagement.



M80 Upgrade (Sydney Road to Edgars Road), Victoria, CPB Contractors

⁴ Our risk management processes are aligned to the requirements of the ISO 31000

A photograph of two workers in a data center. They are wearing white hard hats, safety glasses, and high-visibility vests over dark blue uniforms. They are standing in a long aisle between rows of white server racks. The worker on the left is holding a tablet and looking at it, while the worker on the right is looking towards the camera. The background shows more server racks and a ceiling with lights and ventilation grilles. A blue circular graphic element is visible in the top right corner of the image.

CIMIC GROUP'S MODERN SLAVERY POLICY AND PROTOCOL

Enhancing consultation and engagement across CIMIC Group

In 2021, CIMIC Group introduced a dedicated Modern Slavery Policy and Protocol for assessing and addressing the risk of modern slavery in our operations and supply chain, to operate alongside the CIMIC Code of Conduct.

The governance tools were developed in consultation with Operating Company representatives to meet priorities for efficacy and flexibility.

The tools integrate with, and leverage, the Group's broader governance system, enable Operating Companies to focus on risks specific to their business, and facilitate ongoing consultation across the Group for compliance, continuous learning and improvement.

Our Modern Slavery Policy commits the Group to assessing and addressing the risks of modern slavery, sets out accountabilities, and describes the internal control systems and reporting process that are to apply.

Our Modern Slavery Protocol provides guidance for all of our businesses to assess and address the risks of modern slavery. It outlines:

- the implementation and use of a third-party screening tool, to assist in screening their suppliers and third parties
- implementation of template contracts and conditions for goods or services procured - all contracts must contain a standard clause with respect to modern slavery
- additional appropriate processes and procedures to assess and address the risk of modern slavery, such as questionnaires and training
- employee recruitment and selection practices, in accordance with relevant CIMIC Policies and Procedures
- modern slavery training for relevant roles.



A range of activities facilitate modern slavery due diligence across the Group.

- The convening of two Modern Slavery Committees which engage People, Procurement, Legal, Compliance, Sustainability and Communications functional leads at the parent company level, and at a joint parent and Operating Company level. These committees create the opportunity for cross-Group consultation and collaboration. Meeting bi-monthly (or as required), the committees' objectives are to identify modern slavery risks and mitigations for our operations and supply chains, share ideas for continuous improvement and integrate appropriate controls with existing business processes.
- The use of a Compliance Working Group, which is a collaboration of our Operating Companies' in-house legal teams and other functional representatives as relevant to the particular topic. The group assists with driving and tracking modern slavery compliance (among other topics), and is part of our process for cross-Group consultation.
- The conduct of periodic reviews, by the Group Compliance Manager, assessing the effectiveness of our Operating Companies' use of the Group's third party screening tool (discussed further below), including reviewing activities addressing modern slavery risk.
- The investigation, evaluation and measurement of the effectiveness and adequacy of CIMIC Policies and the Code of Conduct, by the Internal Audit Team, who perform an independent assurance function and provide reports to the Board.

Ethical matters are reviewed by the Reportable Conduct Group⁵ and the CIMIC Group Ethics, Compliance and Sustainability Committee of the Board, which oversees matters related to ethical standards and practices, and compliance with applicable legal and regulatory requirements and internal policies.

Grievance and reporting mechanism

Open communication is key to maintaining our Code of Conduct. We encourage our employees, subcontractors and partners to voice their concerns should they come across any potentially unethical practices – including any human rights grievances.

Our Group Code of Conduct – Management, Monitoring and Reporting Procedure; Anti-Bullying, Harassment and Discrimination Policy and Whistleblower Policy; confidential, independent Ethics Line; and approach to investigating, addressing and remediating breaches, all work together to encourage and reliably manage reporting of any potential unethical practice.

Whistleblowers can remain anonymous and all disclosures, including modern slavery concerns, may be referred to the authorised Business Conduct Representative⁶ who ensures that any disclosure is investigated appropriately, promptly and confidentially. The Workplace Protection Officer is also responsible for safeguarding the interests of any Whistleblower within the organisation.

⁵ The Reportable Conduct Group comprises the Chief Executive Officer or Chief Operating Officer or Managing Director, Chief Financial Officer, General Counsel, and Head of People. There is a Reportable Conduct Group for each Operating Company and at the CIMIC level.

⁶ The Business Conduct Representative is a senior person within the People or Legal function who supports the operation of the Code of Conduct.



ACCESSIBLE

Employees, sub-contractors, third party suppliers, clients and partners can raise a concern about unethical practice with a Manager, a Manager’s manager, a Business Conduct Representative or our Ethics Line.



CONFIDENTIAL



RESPONSIVE

Non-compliances are addressed in accordance with our Code of Conduct - Management, Monitoring and Reporting Procedure and reported to the Business Conduct Representative, Reportable Conduct Group, General Counsel and on to the Board’s Ethics, Compliance, and Sustainability Committee

We encourage reporting, and address, remediate and review for improvement.

CIMIC Group’s grievance and reporting mechanism. For more information go to cimic.com.au/our-group/governance/ethics-line

Procurement

Our procurement framework provides policy, systems and processes to support supply chain due diligence.

Activities include assessing risks in our applicable business sectors and conducting comprehensive due diligence and vetting of subcontractors, suppliers and third parties engaged by our businesses.

As part of the framework, the Group’s Dealing with Third Parties Policy and Procurement Policy incorporate:

- the management of modern slavery risks into our supplier registration (a business integrity check)
- the screening and onboarding process
- a suite of mandatory template commercial contracts
- a set of requirements for suppliers’ management of their suppliers.

This approach is key to CIMIC Group building and maintaining a reliable and trusted supply chain, and proactively identifying and managing modern slavery risks throughout the term of each contract.



Kingaroy Hospital Redevelopment, Queensland, Broad

Supplier screening and onboarding

CIMIC has implemented an internationally recognised due diligence solution to screen third parties for a range of risk factors – including the risk of modern slavery.

This solution is used to evaluate and monitor vendors, suppliers, and business partners.

Since its implementation and as at December 2022, the Group has risk assessed more than 48,000 suppliers.⁷

In 2022 we onboarded 4,462 new suppliers and continue to use the solution to monitor for:

- sanctions, watch-lists, adverse litigation and Politically-Exposed-People (PEP) lists
- adverse print and social media, screening for all jurisdictions in which CIMIC operates
- financial information including company ownership, structure, credit rating and financial strength
- modern slavery risks, bribery and corruption due diligence requirements.

The solution leverages information from the Global Slavery Index prepared by the Walk Free Foundation, and records of adverse media concerning modern slavery allegations and breaches which are collected from various sources including LexisNexis.

Based on the above multi-factor assessment, each supplier is allocated a risk-rating which may trigger additional investigation and due diligence, which may lead to the preparation of corrective action plans where applicable, or in some cases, exclusion from working with CIMIC Group entities. All suppliers or other third parties who are accepted are subject to continuous monitoring for changes in key risks for example change in an entity's legal status or the imposition of a sanction or enforcement.

Our Dealing with Third Parties Policy and supplier onboarding process include specific modern slavery due diligence requirements for those we work with.

Suppliers are required to comply with applicable law and the CIMIC Code of Conduct, and to complete a declaration confirming that no slavery, forced or child labour has been used anywhere by the third party or, to the best of the third party's knowledge, by any direct suppliers to the third party.

The declaration specifically requires suppliers to disclose whether they have:

- been subject to or received any prosecutions, regulatory notices, tendering restrictions, sanction notices, litigation or arbitration concerning allegations of modern slavery or breaches of human rights by their employees or subcontractors and suppliers
- been found guilty of a criminal offence which would include modern slavery crimes under ss 270 and 271 of the Criminal Code (Cth)
- a compliance management program in place to meet business integrity laws and regulations, including those relating to modern slavery.

Suppliers are also required to notify CIMIC if they become aware of any behaviours that are in contravention of applicable laws and confirm they will not use any payments received from CIMIC in violation of modern slavery laws and regulations.

Template commercial contracts

Our Group Procurement Policy requires all Operating Companies to engage suppliers using CIMIC Group's suite of template commercial contracts. The suite includes a number of different forms of contract which can be utilised depending on the scope, location, value and complexity of the works or services to be provided, and the risk profile of the relevant project.

Our template commercial contracts require suppliers to comply with the Group's Code of Conduct, ensuring alignment with the Group's expected behaviours.

The contracts also require suppliers to warrant that they have not been convicted of an offence relating to modern slavery, that they will not breach any modern slavery legislation and that they will comply with any requests of the Operating Companies to comply with all modern slavery legislation, including providing information and documents, and allowing interviews to be undertaken.

Indirect supplier controls

The number of indirect suppliers involved in our businesses is substantial. As a supply chain extends, influencing the behaviours and conduct of indirect suppliers is a greater challenge. By raising awareness, engaging ethical direct suppliers, obliging our supply chain to reject the use of modern slavery, and performing due diligence, we can gradually exert more influence.

Our contracts require our direct suppliers to warrant that their own suppliers enable them to comply with obligations under the CIMIC engagement. Our direct suppliers must:

- ensure their own suppliers read, understand and comply with the CIMIC Code of Conduct which contains information relating to modern slavery
- allow the Operating Company to conduct an independent audit of indirect suppliers to ensure, amongst other things, that they are conducting their business in a proper manner and in accordance with applicable codes of conduct and generally accepted business ethics.

⁷ In addition to the ~41,000 suppliers who have been accepted by CIMIC, over 2,200 applications are pending and CIMIC has rejected in excess of 3,500 applications to be a supplier on grounds including modern slavery. Approximately 1800 have expired.

HUMAN RIGHTS IMPACT ASSESSMENTS – AUSTRALIA 2022

Developing capability for managing the risk of modern slavery in our operations

Cases of forced labour exploitation in Australia predominantly occur in industries considered at risk, including agriculture, construction, domestic work, meat processing, cleaning, hospitality, and food services.⁸ Many of these industries employ a high percentage of migrant workers including temporary work visa holders. Risks include individuals experiencing underpayment, non-payment of entitlements, such as leave or superannuation, and sub-standard accommodation, withholding of passports, working excessive hours, low wages, threats to themselves or their family, as well as restriction of their movement.

The HRIAs were conducted at:

- A CPB Contractors site in Western Australia, where the scope of work includes both greenfield and brownfield works
- UGL's operations in Victoria, where the team provides maintenance services.

Both HRIAs were conducted in 4 steps:

- 1. Research** – Conducting desktop research, data collection and analysis across:
 - > legal regulatory frameworks
 - > governance instruments, including policies and standard operating procedures
 - > workforce information, including workforce data, payroll, employment contracts, and training records
 - > health and safety management, including Total Recordable Injury Frequency Rates, and incident records
 - > client information
 - > service providers, including labour hire contracts
- 2. Site visit** – Conducting a project visit including observation of the workplace including offices, work site and accommodation facilities and interviews with
 - > operational leaders and key functional leaders for human resources, legal and safety
 - > vulnerable employee groups
 - > labour hire supplier(s)
- 3. Report** – Preparing a full report of findings, based on desktop research and site visit
- 4. Executive briefing** – Delivering the HRIA report and a briefing to the Operating Company Executive Leadership Team on findings, recommendations and action plans as required.

The CPB Contractors and UGL HRIA teams reported project participants' open and collaborative engagement in the assessment process, and positive feedback that the experience improved team members' ability to identify and assess indicators of modern slavery risks.

⁸ Source: Walk Free Foundation, The Global Slavery Index 2018 Findings / Country studies – Australia <https://www.globalslaveryindex.org/2018/findings/country-studies/australia>

People and employment

CIMIC Group focuses on creating a workplace culture which puts safety first and fosters our Principles of Integrity, Accountability, Innovation and Delivery. We invest in our people to build safe, rewarding careers, and prioritise cultivating an inclusive workplace, advancing gender equality, increasing indigenous employment and the use of indigenous suppliers, and investing in local employees where we operate.

Human Rights Impact Assessments (HRIA)

Our HRIA program, commenced in 2017, prioritises assessments in geographies where we have a significant workforce.

We have undertaken HRIAs in our construction operations in India (2017), the Philippines (2019), Papua New Guinea (2020), Hong Kong (2021) and Australia (2022).

In 2020, CPB Contractors (Papua New Guinea) used the Group's self-assessment tool to conduct HRIAs as desktop research, due to COVID-19 constraints.

In 2021, CIMIC conducted a HRIA of Leighton Asia's Hong Kong operations. Our minerals processing business, Sedgman, also conducted a HRIA of a China based supplier.

In 2022, CIMIC initiated HRIAs at a CPB Contractors construction operation in Western Australia and a UGL services operation in Victoria, Australia, with reports completed in early 2023.

CIMIC GROUP HRIA PROGRAM APPROACH

Managing a consistent, disciplined approach to assessing human rights impacts

CIMIC Group's HRIAs are based on the Human Rights Assessment Quick Check prepared by the Danish Institute for Human Rights.

The Group's HRIA and Operating Company self-assessment tools assess categories including governance and leadership; people management; health and safety; community engagement; security arrangements; country risks; and procurement.

Within the people management area, the HRIA and self-assessment tools audit compliance with our template employment contracts and review modern slavery indicators such as: wages and benefits, working hours, employment criteria (such as age), freedom of association, health and safety, unlawful discrimination and worker accommodation.

Assessment steps include engaging leadership, undertaking risk assessment and due diligence, conducting site visits, reporting findings and developing action plans.

Completed HRIAs have also highlighted where CIMIC Group is providing employment conditions which are more favourable than common industry practice and/or required by local legislation. Some of these areas include the provision of higher standards for safety, training of unskilled workers and worker medical services.

Kaban Green Power Hub, Queensland, UGL



MILESTONE REACHED ON PNG HOSPITAL PROJECT

Building local opportunities and capabilities

CPB Contractors has successfully completed its part of the ANGAU Hospital Redevelopment project in Papua New Guinea.

Almost 90% of site work hours were completed by Papua New Guineans.

As an Australian PNG-based company for a decade, CPB Contractors predominantly employs local people, and partners with local businesses and supply chains wherever possible. The approach is improving employment and capacity building opportunities for the local workforce, including equitable opportunities for women and men.

The business also works closely with the local university to create employment opportunities for undergraduate and graduate engineers and ensure that its workforce is mentored and up-skilled throughout the project.

Priscilla Tangu, a Junior Engineer with CPB Contractors said working on the hospital project has been an inspiring journey: "I am so happy and proud to say that I have learnt so much about the new technologies involved within the construction industry from software to plant and equipment to methodology, some of which I did not even know existed until now."

Despite the challenges brought by COVID, CPB Contractors finished its contract safely to time and budget.

Our Governance framework guides consistent and disciplined operations across our business, markets and geographies.

Our policies and processes, including our Human Rights Impact Assessments, support safe, respectful, and inclusive work environments, and our management of modern slavery risks.

ANGAU Memorial Hospital Redevelopment, Papua New Guinea, CPB Contractors

People policies

Our overarching People framework guides operations across our businesses, markets and geographies, facilitating compliance with, and often exceeding, local laws.

Policies and processes that help to build respectful, safe and inclusive work environments and to mitigate modern slavery risks include our:

- Recruitment Policy, procedures and management systems with formal approval gates including verification of the candidate's identity and their right to legally work
- Health and Safety Policy
- Anti-Bullying, Harassment and Discrimination Policy
- Diversity and Social Inclusion Policy
- Flexible Working Policy
- Parental Leave Policy
- Family and Domestic Violence Policy
- Redundancy Policy.

Our Internal Audit team audits our Operating Companies' compliance with CIMIC Group policies.

STANDING AGAINST SEXUAL HARASSMENT

Supporting diversity and safe work environments

Leighton Asia's operation in India has been conducting mandatory Prevention of Sexual Harassment (POSH) workshops across its offices and projects to comply with the government's POSH Act.

The POSH Act mandates that every employer is to provide a safe working environment. It defines sexual harassment, and lays out the procedures for a complaint and inquiry, and the action to be taken.

It also requires every employer to constitute an Internal Complaints Committee (ICC) at each office with 10 or more employees.

The workshop talked about the importance and implications of the POSH Act, followed by a committee member of Leighton Asia's ICC sharing ways to prevent sexual harassment in the workplace and some case studies.

Organising POSH training is a step toward protecting the rights of women employees and ensuring equality in the workplace. The training complements our Group's ongoing Equal Employment Opportunity, Discrimination, Anti-Bullying and Harassment training which is promoting diversity and inclusion.

Standing up for human rights, fair treatment of all people and the environment is essential to optimise and share project benefits for a better, fairer future.

Cross River Rail, Queensland, Pacific Partnerships, CPB Contractors, UGL

Education and training

Our mission includes our intent to provide safe, rewarding and fulfilling careers for our people. On-the-job development is complemented with a range of learning experiences that build skills and technical capabilities and these are underpinned by our Principles and Code of Conduct.

In 2022, we delivered 197,953 hours of training across the Group, which equates to more than 10 hours per annum for each direct employee.

Education and training are integral to our compliance framework, and to engaging and upskilling our people in meeting their legal, regulatory and compliance responsibilities. We monitor, report and manage training completion rates through our Group's centralised learning management system, One Learning, and by using on-site project records.

Code of Conduct and Compliance

Our foundational Code of Conduct training covers CIMIC Group's Principles and Code of Conduct, ethical behaviour, and key policies including health, safety and environment; unlawful discrimination; anti-bribery and corruption; and anti-bullying and harassment.

We require employees to complete Code of Conduct training via e-learning within three months of their commencement with refresher training completed every two years. We also provide more detailed face-to-face training to employees in roles with potential exposure to key risks.

Whistleblower and Equal Employment Opportunity training are also mandatory for all staff employees.

Additionally, depending on roles, some employees are also required to complete specific compliance training. Topics delivered via e-learning include unconscious bias, IT security, and anti-bullying, harassment and unlawful discrimination. Our Operating Companies also provide additional specialised face-to-face training on relevant topics such as competition law issues.

Modern slavery

The Group's modern slavery training equips our people to recognise and report modern slavery risks. This training is made available online for staff and may also be conducted in face-to-face workshops with managers and employees in procurement and people roles. Communication resources support the training, facilitating greater understanding of the issue and its importance to our business.

Leadership

Our Program One leadership training program promotes visible leadership. It sets a consistent, Group-wide approach, equipping our leaders and team members to live by our Principles of Integrity, Accountability, Innovation and Delivery, to put safety first, and to meet the standards of behaviour set out in our Code of Conduct.

Program One explores the principles that effective leaders are consistent, fair, and resilient; they lead by example and provide open and honest feedback, they own their decisions, understanding the risks and consequences.

The program's four modules are tailored for progressive career growth:

- Self-leadership provides techniques for working with our Principles, and working as part of a team and building personal resilience.
- Frontline Leadership provides tools and techniques for developing and motivating teams.
- Leading Managers provides tools and methods on how to lead a function or business unit.
- Executive Leadership supports leaders to envision and enact high-performance in our Group.

During 2022, CIMIC conducted Program One workshops for 95 frontline leaders and 102 middle managers across certain Australian states, New Zealand, Indonesia and Hong Kong.

UNLOCKING THE TRUE POTENTIAL OF THE LOCAL WORKFORCE

Building community capacity

As part of our corporate social responsibilities and to comply with local laws, Leighton Asia's operation in India has been partnering with a government training institute to upskill and attract a local workforce, to join the construction industry.

A Construction Skill Training Centre at Gurgaon, India has been set up by Leighton Asia to provide different trade trainings such as bar bending, scaffolding, masonry work, shuttering carpentry, and formwork.

Upon the completion of the 14-day training module, participants who passed the government's assessment will be certified as a trade worker by the National Skill Development Council. They can work on civil and structure related activities on construction projects in India.

Since opening the Construction Skill Training Centre in February 2022, Leighton Asia has upskilled more than 100 workers in different construction trades.

Our modules provide structured training on both theory and practical sessions to ensure works are conducted to the highest health, safety and environmental standard. This bridges the skill gaps and provides better job prospects for the local workforce.



Respecting all people's human rights is the cornerstone of truly sustainable development that protects the environment, lifts communities, and builds an enduring positive legacy for future generations.

Western Sydney International (Nancy-Bird Walton) Airport Airside Works, New South Wales, CPB Contractors

5. 2022 ACTIONS

In 2022, a range of actions were taken to enhance our capabilities to identify, mitigate and prevent modern slavery risks across the Group's operations and supply chain, and respond should any impacts occur.

OPERATIONS

Governance and compliance

- Continued embedding CIMIC's Modern Slavery Policy and Protocol across the Group, which sets out the responsibilities and accountabilities for modern slavery risks and controls
- Continued to review, assess and understand the human rights risks for each Operating Company and the Group, including in collaboration with HOCHTIEF AG

People and employment

Human Rights Impact Assessments (HRIA)

- Two HRIsAs were initiated by CIMIC and deployed by CPB Contractors, at a construction project in Western Australia, and by UGL, at its maintenance services operations in Victoria

Training

- Conducted Code of Conduct training which was completed by 6,215 team members
- Conducted modern slavery awareness training which was completed by 2,880 team members
- Conducted Whistleblower Legislation training which was completed by 3,214 team members
- Conducted leadership training with 95 frontline leaders and 102 middle managers across certain Australian states, New Zealand, Indonesia and Hong Kong
- CPB Contractors introduced a Young Persons in the Workplace guideline to appropriately manage employees who are undertaking traineeships and apprenticeships and are under the age of 18 years

SUPPLY CHAIN

Governance and compliance

- Continued embedding CIMIC's Compliance Policy and Procedure including Modern Slavery Plans and other controls and tools
- Continued cross-Group consultation in the Modern Slavery Committee Meetings and the Compliance Working Groups

Procurement

- Continued embedding the Dealing with Third Parties Policy, Group Procurement Policy and Modern Slavery Policy and Protocol with the Procurement teams of our Operating Companies

- Risk assessed the 18,472 suppliers we worked with in 2022
- Processed approximately 4,462 new suppliers through the supplier onboarding process, including the screening tool. Where identified risk ratings required further investigation and assessment, remedial plans were implemented
- Undertook periodic review of the third party screening tool
- Continued to perform supply chain risk assessments, having regard to commodity, industry, jurisdiction, spend, dependency, length of relationship and reputation

ASSESSING EFFECTIVENESS

Our assessment of effectiveness is evidence based and includes monitoring and analysing risk analysis and compliance audit results, supplier screening and risk assessment, monitoring and closeout of corrective action plans, training participation rates, communications engagement, Human Rights Impact Assessment results, the completion of improvement plans and responsiveness to grievances.

Quantitative data and regular qualitative reviews facilitated by our governance framework shape our annual planning process.

Key touch points which support our assessment and planning process include our:

- Cross-Group engagement at the Compliance Working Group and Modern Slavery Committees (see section 4)
- Risk analysis (see section 3).

6. LOOKING AHEAD

2023 PRIORITIES

Over the next year, CIMIC Group will focus on continuing to:

- enhance our understanding and knowledge of modern slavery risks, in collaboration with our Operating Companies, HOCHTIEF Australia and HOCHTIEF AG
- conduct a review of our approach to modern slavery risk management with reference to the Australian Government's Review of the *Modern Slavery Act 2018* (Cth)
- risk assess new suppliers, vendors and business partners using the third party screening tool and, if necessary, develop and implement appropriate corrective actions plans and/or remediation measures
- monitor existing suppliers, vendors and business partners using the third party screening tool to identify, among other things, any breaches, fines or sanctions in relation to modern slavery and other ESG risks
- build our people's capability to recognise and report risks of modern slavery
- continue raising employee awareness via Modern Slavery training
- continue our modern slavery risk monitoring and reporting activities.

ONGOING ENGAGEMENT AND COMMUNICATION

We will continue to engage with Government, industry, regulators and other organisations to build awareness and understanding to combat modern slavery.

Engagement is a key input to our continuous focus on modern slavery risks and developing a trusted supply chain.

We value gaining and sharing insights with and from relevant organisations.

- Government and regulatory bodies in the different regions in which we operate – Our Compliance Team monitors for updates on the status of legislation and developments in the area of modern slavery.
- Australian Border Force Modern Slavery Business Engagement Unit
- Industry Associations – We value and consider guidance, advice and recommendations provided by industry associations in the regions in which we operate to assist with identifying and addressing modern slavery risk in the construction, services and resources sectors. Organisations we liaise with include the Business Council of Australia, Australian Mines and Metals Association and the Chartered Institute of Procurement and Supply
- External forums – Members of our People and Compliance teams participate in numerous external forums to improve their awareness of modern slavery risks and to embed learnings within the business.

Country Regional Network, New South Wales, UGL

APPENDIX

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

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

HOCHTIEF AUSTRALIA HOLDINGS LIMITED ABN 17 103 181 675

as defined by the *Modern Slavery Act 2018 (Cth)*¹ (“the Act”) on 19 June 2023

Signature of Responsible Member

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

HOCHTIEF AUSTRALIA HOLDINGS LIMITED ABN 17 103 181 675

as defined by the Act²:



Mr David Robinson

Director of HOCHTIEF AUSTRALIA HOLDINGS LIMITED

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.	2, 26
b) Describe the reporting entity’s structure, operations and supply chains.	4-7
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.	8-9
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.	11-23,24
e) Describe how the reporting entity assesses the effectiveness of these actions.	24
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).*	2
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	N/A

* 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.

1. 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.

2. 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.



Sydney CBD Tower over Sydney Metro's new Pitt Street Station, New South Wales, CPB Contractors



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