

MODERN SLAVERY STATEMENT

Modern Slavery Statement for Reporting Year ending 30 June 2021

Introduction

It is estimated that there are over 40 million victims of modern slavery on any given day throughout the world, with over 24 million of those victims in forced labour. While the greatest risks of modern slavery appear to be most prevalent in Africa, Asia and the Pacific region, there are still instances and victims of modern slavery within Australia.

It is recognised that between 2004-2014, there were 841 possible cases of human trafficking and slavery that were reported to the Australian Federal Police.

It is also recognised that the property and construction industry is a labour intensive industry and that 25-35% of modern slavery cases concerned labour exploitation.

Fulton Hogan is committed to acting ethically and with integrity and transparency in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

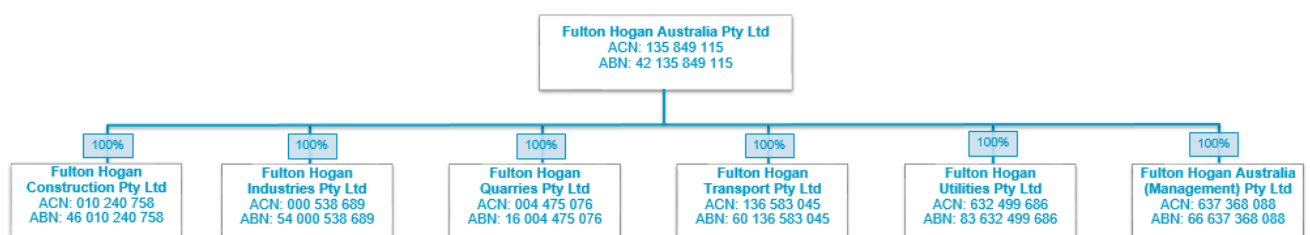
Our operations and structure

Founded in New Zealand in 1933, then in Australia in 1981, Fulton Hogan is a leading infrastructure and civil engineering company with more than 80 years' experience in the infrastructure, transport, water, and telco sectors and employs over 3,500 people in regional and city-based locations across Australia.

The Fulton Hogan Group is comprised of 29 controlled entities globally, predominantly in Australia and New Zealand. The ultimate parent entity in the Fulton Hogan Group is Fulton Hogan Ltd. Fulton Hogan Australia Pty Ltd is the holding company of 11 of Fulton Hogan’s Australian based controlled entities.

This statement covers Fulton Hogan Australia Pty Ltd and each of the entities it controls.

A simplified structure of the Fulton Hogan entities covered by this statement is as follows:



Supply Chain

Fulton Hogan’s supply chain is built to support the multiple entities in the Fulton Hogan Group, each of which acts in accordance with Fulton Hogan’s values and vision.

The supply chain is complex, having regard for the complex nature of Fulton Hogan’s operations. The suppliers within our supply chain include providers of a variety of goods and services including but not limited to the supply of corporate uniforms and personal protective equipment, construction materials including raw resources, machinery and equipment hire, car leasing, design and architecture, communications services, traffic management solutions, security services such as fencing, waste and recycling facilities, information and technology, painting and coating, and environmental landscaping.

The majority of our suppliers and subcontractors are based in Australia, however there are some based overseas.

Fulton Hogan has procurement policies and procedures, which includes a requirement to act in accordance with our Anti-Modern Slavery Standard which requires that Fulton Hogan and any external parties who directly or indirectly provide goods or services to us to not use or benefit from the following practices:

- child labour;
- any form of forced or compulsory labour;
- workers who are not free to leave employment or work after reasonable notice;
- passports taken away from workers;
- any form of debt bondage (debt slavery). Workers should not be forced to work to pay off a debt or to pay for accommodation or other costs imposed upon them by the employer, in circumstances where the value of their work becomes the same or greater than the sum of money owed;
- compensation and benefits that do not comply with fundamental principles relating to minimum wages, overtime hours and legally mandated benefits;
- not respecting the formation of trade unions and powers of collective bargaining; and
- unsafe or unhealthy working conditions for workers that do not meet or exceed applicable standards for workplace safety and health.

Risk Management and Consultation

Our Anti-Modern Slavery Standard applies to Fulton Hogan Australia and each of the entities that it controls. Therefore, our approach to modern slavery within Australia is 'group wide'.

This 'group wide' approach includes a combination of procurement policies and procedures surrounding modern slavery practices of those within our supply chain. As part of this practice, we undertake due diligence checks and certifications from our suppliers by having them complete a modern slavery questionnaire to establish whether or not they engage in modern slavery practices. This due diligence check is critical to ensuring compliance with our Anti-Modern Slavery Standard and has been created by and based on feedback provided by a large number of people involved in procurement and risk within Fulton Hogan.

In preparing of this statement, Fulton Hogan engaged and consulted with the entities that we own or control.

Key areas of action to address the risk of Modern Slavery

During our reporting period, we ensured compliance with our Anti-Modern Slavery Standard and addressed the risk of Modern Slavery within both our operations and our supply chain by undertaking the following actions:

- undertaking a randomised audit of compliance with our Anti-Modern Slavery Standard;
- reminding relevant staff of our Anti-Modern Slavery Standard and encouraged relevant staff to become familiar with its content;
- reviewing and updating our procurement and due diligence procedures with our suppliers and sub-contractors; and
- reviewing all of our purchase order terms and conditions and all of our supplier contracts with a view to ensuring that they contain relevant contractual prohibitions against suppliers engaging in modern slavery practices.

How will we measure effectiveness

We will measure the effectiveness of the adherence to our Anti-Modern Slavery Standard by:

- continuing to conduct audits of our processes to ensure compliance; and
- investigating any reports of suspected breach of our Anti-Modern Slavery Standard.

Approval of Modern Slavery Statement

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) and has been approved by the Board of Fulton Hogan Australia Pty Ltd.



Cos Bruyn
Managing Director
Fulton Hogan Ltd