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The Douglas Group Ltd Modern Slavery Statement 2022

1. Introduction

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

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

This statement constitutes the Douglas Group's modern slavery statement in accordance with the *Modern Slavery Act 2018* (Cth) (**Act**) for the financial year ended 30 June 2022.

This is the second Modern Slavery Statement by the Douglas Group. Consistent with our commitment to continuous improvement, we set out the achievements and milestones over the last year and our actions planned for the next year.

2. Reporting entity, structure and operations

Structure

The Douglas Group Ltd is the ultimate holding company of its related bodies corporate, which it holds and controls.

The Douglas Group is an Australian engineering consultancy business, which specialises in geotechnical and environmental advisory services. The Douglas Group primarily provides services in relation to projects in Australia, with occasional international projects in New Zealand and Papua New Guinea. The Douglas Group's registered office is at 96 Hermitage Road West Ryde NSW 2114.

Douglas Partners Pty Ltd is the main operating entity and consulting arm of the Douglas Group. It is incorporated in New South Wales, with approximately 500 employees across 20 offices in NSW, QLD, VIC, WA, NT and ACT.

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

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

Supply Chain

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

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

(a) Services provided by suppliers

The Douglas Group's supply chain is primarily comprised of professional engineering consulting providers and drilling and testing contractors that we collaborate with to assist in

our project delivery. We also directly engage suppliers of services to assist with the ongoing operation and maintenance of our offices, including facility management.

(b) Products provided by suppliers

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

(c) Products and services used by indirect suppliers

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

3. Modern slavery risks

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

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

Ground Test carries out a range of drilling services internally and externally to the geotechnical, environmental and groundwater industries.

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

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

4. Actions and effectiveness

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

The Douglas Group over the last year has informed itself to gain a better understanding of our modern slavery risks and how such risks may be present in our operations and supply chains to enable us to consider how we will address modern slavery in our organisation.

As reported in our first Modern Slavery Statement, the Douglas Group prepared its Modern Slavery Framework Plan. This set the roadmap for building our modern slavery risk framework with the aim of developing awareness and measures to ensure we can assess and address modern slavery risks in our operations and supply chains. The Douglas Group has continued its implementation of that Framework Plan, which has been updated to include further action items.

Modern Slavery Framework Plan

Task	Description	2021	2022
Modern Slavery Framework Plan	Roadmap for building our modern slavery risk framework.	Completed	Completed
Subcontractor/Subconsultant/Supplier Pre-Qualification Questionnaire	Revised supplier due diligence questionnaire to check that suppliers address modern slavery risks in their operations and supply chains and have processes for identifying, investigating and remedying relevant risks.	Completed	Completed
Subconsultant/Subcontractor Agreements	Revised contract templates to require subcontractors and subconsultants to take reasonable steps to identify, assess and address modern slavery risks in the operations and supply chains used in providing services to the Douglas Group.	Completed	Completed
Modern Slavery Statement	Modern Slavery Statement for the financial year ended 30 June.	Completed	Completed
Modern Slavery Policy	Modern Slavery Policy on managing modern slavery risks in its businesses.	In progress	Completed
Whistleblower Policy	Update existing Whistleblower Policy to address modern slavery risks. This policy has also been updated to provide details of an anonymous whistleblower hotline available to staff.	In progress	Completed
Modern Slavery Training	Staff training on modern slavery framework, policy and procedures on addressing modern slavery risks.	Planned	In progress
Implementing, administering, monitoring compliance	Ongoing responsibility for implementing and administering the policies, procedures and monitoring compliance.	Planned	In progress
Annual supplier risk assessment	Determine level of risk associated with suppliers, to inform internal audit.	N/A	Planned
Annual internal audits	Audit high-risk suppliers to monitor compliance with Douglas Group modern slavery policy and supplier code of conduct.	Planned	Planned
Purchase Order Terms	Contractually requiring suppliers to take reasonable steps to identify and address modern slavery risks through our purchase order terms and conditions.	Ongoing	Ongoing

As identified above, in its first year, the Douglas Group has successfully implemented key measures in its Modern Slavery Framework Plan so as to mitigate the risks of modern slavery practices in its business, including the publication of a Modern Slavery Policy. In completing key tasks, no further modern slavery risks have been identified nor existing risks exacerbated.

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

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

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

5. Consultation

The Risk Committee plays an important role at the Douglas Group in overseeing the regular review of risk management activities, including the continuous improvement and support of modern slavery policies and guidelines. Its members comprise directors and executives of the Douglas Group with oversight across the business' functions. The Risk Committee has continued making assessments of the Douglas Group's modern slavery risks, which has involved consultation with the Finance and Legal teams and other parts of the business responsible for procuring suppliers. In developing the items set out above in the Modern Slavery Framework Plan, consultation has also occurred with Quality Assurance personnel on supplier due diligence and with Human Resources on the overall framework. Consultation with relevant stakeholders through our operations will be ongoing as the framework continues to be implemented.

6. Other information

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

This statement was approved by the Board of The Douglas Group Ltd on 19 December 2022.

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



Bruce Stewart
Chair
The Douglas Group Ltd

20-12-2022

Dated