



RESPECTING HUMAN RIGHTS

JOINT MODERN SLAVERY STATEMENT

Reporting period: 1 January 2024 - 31 December 2024

2024



Cover image: **HumeLink West high voltage electricity transmission project**, New South Wales, UGL and CPB CONTRACTORS
This page: **Tseung Kwan O-Lam Tin Tunnel project**, Hong Kong, LEIGHTON ASIA



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TRUSTED EXPERIENCE. INTEGRATED SOLUTIONS.

At CIMIC Group we're using our engineering-led capabilities and advanced technologies to deliver sustainable high-performing assets, infrastructure, and resources projects.

Our companies are leaders in the engineering and construction, integrated solutions, natural resources and investment market segments.

We are passionate about connecting people to better services and opportunities with community-shaping projects, like data centres, solar farms, major metro rail networks, water treatment plants, hospitals, and schools.

We continue to expand what we achieve and how we shape the future by adding value for our clients, achieving sustainable returns, developing and keeping our team members safe, and building and maintaining a reliable and trusted supply chain.

COMMITMENTS

We respect human rights and acknowledge 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.

Our approach to evolving our business and improving environmental, social and governance outcomes is informed by key international principles and standards such as the UN Guiding Principles on Business and Human Rights, the UN Global Compact, the UN Sustainable Development Goals (SDGs), and the International Labour Organisation's standards.



**Western Sydney International (Nancy-Bird Walton) Airport's
airside civil and pavement works**, New South Wales,
CPB CONTRACTORS, supported by EIC ACTIVITIES

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Integrated solutions, UGL

STATEMENT DEVELOPMENT AND APPROVAL SUMMARY

COMPANY INFORMATION AND OWNERSHIP STRUCTURE

CIMIC Group Limited ABN 57 004 482 982 is a fully owned subsidiary of HOCHTIEF Australia Holdings Limited ABN 17 103 181 675 (HOCHTIEF Australia), an entity incorporated in Australia.¹

HOCHTIEF Australia, based in Sydney, is fully owned by German based company HOCHTIEF Aktiengesellschaft (HOCHTIEF). Listed on the Deutsche Börse, HOCHTIEF is an engineering-led global infrastructure group with leading positions in North America, Australia and Europe and a rapidly expanding presence in high-tech, energy transition and sustainable infrastructure markets. Read more about [HOCHTIEF](#).

The largest shareholder in HOCHTIEF is Spain based company Actividades de Construcción y Servicios, SA (ACS), which holds 80% of the shares in HOCHTIEF.² ACS is a global infrastructure operator and provider made up of leading companies in the development,

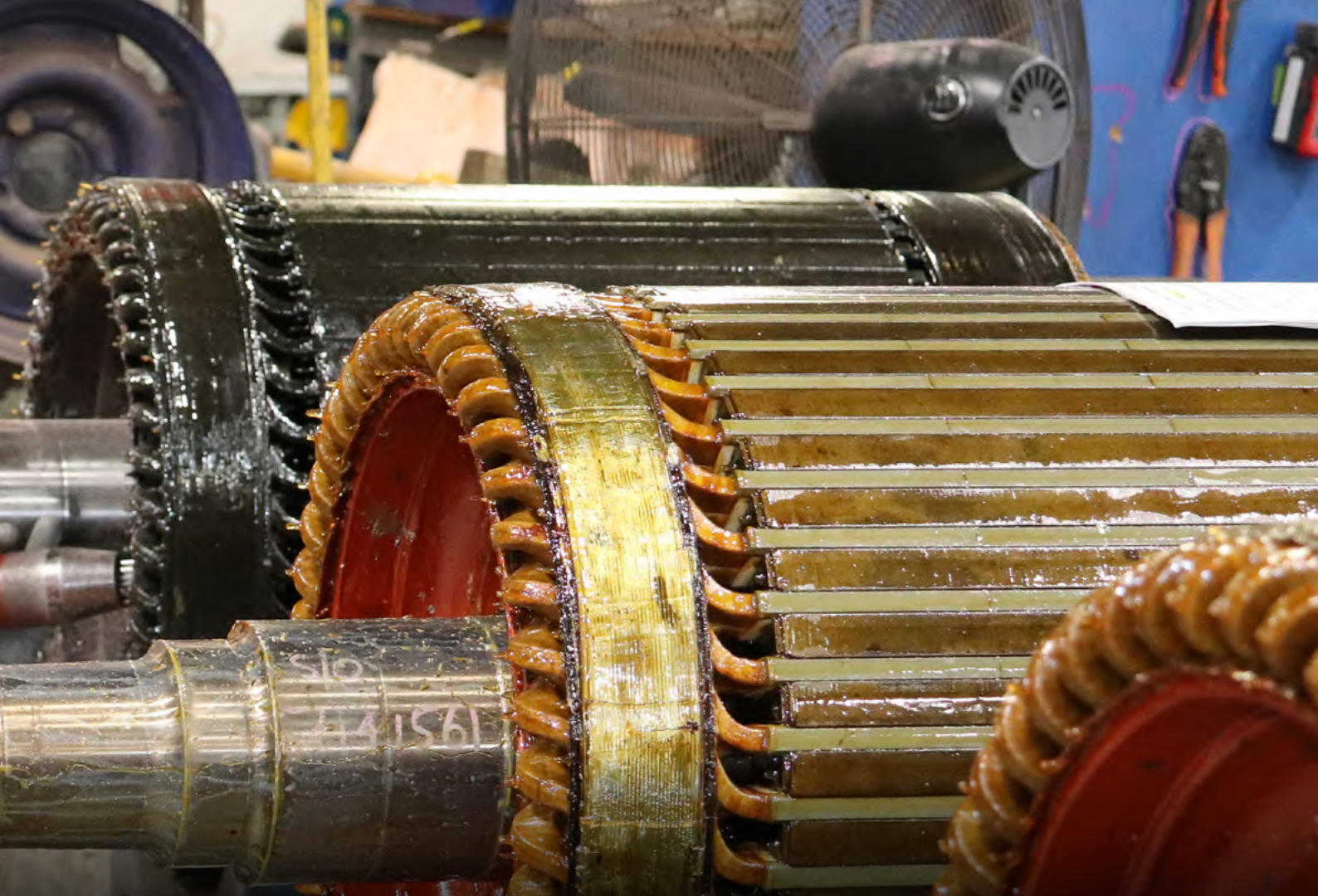
financing and operation of engineering, civil works and construction projects, as well as new generation solutions in high value-added sectors such as energy transition, digitalisation and smart mobility. Read more about [ACS](#).

Following CIMIC Group's 100% takeover by HOCHTIEF Australia, we remain a leading, locally managed, standalone company. As an Australian-based group, CIMIC has retained its local corporate and operational management, as well as Independent Directors.

This ownership structure provides a number of key benefits to CIMIC Group and the broader ACS group of companies, particularly in respect to leveraging shared knowledge, best practices, people development opportunities, research and development (R&D), global procurement and client connectivity.

¹ CIMIC was removed from the Official List of the Australian Securities Exchange at the close of trading 11 May 2022 under Listing Rule 17.14, following compulsory acquisition of its remaining securities by HOCHTIEF Australia.

² As at 27 February 2025.



ABOUT THIS STATEMENT

CIMIC Group's³ 2024 Joint Modern Slavery Statement presents our annual report on the risks of modern slavery in our operations and supply chains, and actions to address those risks, as required under Australia's *Modern Slavery Act 2018* (Cth) (the Act).⁴

This Statement is for the period 1 January 2024 to 31 December 2024. It is CIMIC Group's fifth Modern Slavery Statement and our third under HOCHTIEF Australia.⁵

Prepared as a joint statement pursuant to sections 14 and 16 of the Act, this Statement covers our reporting entities as listed on page 8 and each of their owned and controlled entities. This includes Hochtief Australia, CIMIC Group, and our Operating Companies, CPB Contractors (including Broad Construction⁶), Leighton Asia, UGL, Sedgman, and the Thiess Group

(60% ownership), as well as Pacific Partnerships, EIC Activities, Devine, Leighton Properties and IDD Tech.

The Thiess Group is included⁷, having been excluded in 2022 and 2023 when CIMIC Group did not have a controlling interest in the business.⁸ In 2021, 2022 and 2023 the Thiess Group prepared its own standalone Joint Modern Slavery Statements.

Other acquisitions in 2024 included PYBAR (PYBAR Holdings Pty Limited), acquired by the Thiess Group, Prudentia Engineering (Prudentia Process Holdings Pty Ltd)⁹ and MinSol Engineering (MinSol Engineering Pty Ltd)¹⁰, acquired by Sedgman, and Maverick United (Maverick United Sdn. Bhd.), acquired by Leighton Asia. During the reporting year, CPB Contractors integrated its specialist building subsidiary Broad Construction into the contractor's national building business.¹¹

³ In this Statement a reference to 'CIMIC Group', 'the Group', 'we', 'us' or 'our' is a reference to CIMIC Group Limited ABN 57 004 482 982 and the entities that it controls unless otherwise stated.

⁴ *Modern Slavery Act 2018* (Cth). <https://www.legislation.gov.au/C2018A00153/latest/text>

⁵ All of CIMIC Group's previous Joint Modern Slavery Statements are available from cimic.com.au/Publications.

⁶ In 2024, CPB Contractors integrated its 100% owned subsidiary Broad Construction into its national building team.

⁷ CIMIC Group acquired an additional 10% of the equity in Thiess Group Holdings Pty Limited from Elliott Advisors (UK) Ltd (Elliott) in April 2024. The acquisition increased CIMIC's ownership of the Thiess Group to 60%. Consequently, CIMIC has fully consolidated the Thiess Group in its financial accounts from acquisition date 23 April until 31 December 2024. Thiess Group information has been disclosed for the full twelve-month period in this report. CIMIC sold 50% of the Thiess Group to Elliott in 2020, with a put option back to CIMIC exercisable between January 2024 and December 2026. Following this transaction, the put option for the remaining 40% is exercisable between April 2025 and December 2026.

⁸ In this document a reference to 'Thiess Group' is a reference to Thiess Group Holdings Pty Limited ABN 34 646 054 757 and the entities that it owns and controls unless otherwise stated.

⁹ Now operating as Sedgman Prudentia.

¹⁰ Now operating as Sedgman MinSol.

¹¹ See Section 4 *Assessing and addressing the risks of modern slavery* for information regarding integration processes for acquisitions.



Natural resources, THIESS, THE THIESS GROUP

The reporting entities for the purpose of this Statement are as follows:

HOCHTIEF Australia Holdings Limited	ABN 17 103 181 675
CIMIC Group Limited	ABN 57 004 482 982
CIMIC Group Investments No.2 Pty Limited	ABN 63 610 264 189
CIMIC Group Investments Pty Limited	ABN 74 126 876 953
CPB Contractors Pty Limited	ABN 98 000 893 667
Broad Group Holdings Pty Ltd	ABN 50 052 046 518
Broad Construction Pty Ltd	ABN 38 089 532 061
UGL Pty Limited	ABN 85 009 180 287
UGL Engineering Pty Ltd	ABN 96 096 365 972
UGL Operations and Maintenance Pty Limited	ABN 17 114 888 201
UGL Operations and Maintenance (Services) Pty Limited	ABN 76 010 045 299
UGL Rail Services Pty Limited	ABN 58 000 003 136
UGL Regional Linx Pty Ltd	ABN 97 646 771 011
UGL Unipart Rail Services Pty Ltd	ABN 49 154 895 940
Sedgman Pty Limited	ABN 86 088 471 667
Thiess Group Finance Pty Ltd	ABN 49 646 055 629
Thiess Group Holdings Pty Ltd	ABN 34 646 054 757
Thiess Group Investments Pty Ltd	ABN 43 659 649 055
Thiess MidCo Holdings Pty Ltd	ABN 45 645 168 672
Thiess Pty Ltd	ABN 87 010 221 486
Thiess SQ Holdings Pty Ltd	ABN 54 645 403 532
MACA Civil Pty Ltd	ABN 20 146 021 347
MACA Limited	ABN 42 144 745 782
MACA Mining Pty Ltd	ABN 22 102 886 064
MACA Plant Pty Ltd	ABN 29 110 779 167
PYBAR Mining Services Pty Ltd	ABN 96 060 589 433
RTL Mining and Earthworks Pty Ltd	ABN 60 152 855 135



STATEMENT PREPARATION AND APPROVAL

Preparation of this Joint 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, in consultation and collaboration with HOCHTIEF Australia, CIMIC Group and our Operating Companies.

Our Operating Companies have reviewed and verified the data contributed for this Statement and implemented the year's modern slavery management and prevention activities as applicable to their business.

This Statement has been reviewed and approved by the principal governing body of the 'higher entity' as defined by the *Modern Slavery Act 2018* (Cth), being the Board of HOCHTIEF Australia. Supporting this approval, this Statement has also been reviewed and approved by the Board of CIMIC Group Limited, the Executive Chairman and Chief Executive Officer of CIMIC Group, the Chief Executive Officer of the Thiess Group, and the Managing Directors of each of our other Operating Company businesses listed on page 7.

All references to dollar amounts in this document are to Australian dollars.

Further reference

Our 2024 Joint Modern Slavery Statement can be read in conjunction with CIMIC Group's reporting suite available at cimic.com.au/publications

Other relevant information and resources include the Thiess Group's 2024 Sustainability Report and 2023 Joint Modern Slavery Statement.







MESSAGE FROM THE EXECUTIVE CHAIRMAN

HUMAN RIGHTS – A CORNERSTONE OF SUSTAINABLE DEVELOPMENT

CIMIC Group's fifth Modern Slavery Statement reaffirms our human rights commitment and reports on our actions to assess and address modern slavery risks in our operations and supply chain.

Delivering high-value infrastructure, industrial services, and resources solutions and expanding in next generation sectors such as energy transition, advanced technology, and critical minerals, CIMIC Group is committed to operating ethically and sustainably.

Aware of our corporate responsibilities, we have anchored human rights and modern slavery due diligence into how we operate.

Our Code of Conduct, governance framework, control systems, Human Rights Risk Assessments (HRRAs), and compliance training program support our Operating Companies to identify, mitigate and prevent human rights risks including modern slavery.

We continually review our governance activities in line with local and international developments, advances in law and regulation, and any changing operating environment risks as we expand in core and new markets.

In 2024, we updated and expanded our Modern Slavery Policy and Protocol to become a broader Human Rights Policy and a Human Rights Procedure, and we enhanced our HRRAs program.

Throughout the year, our Code of Conduct and broader compliance training program, continued to help our people to identify and report any potential human rights and modern slavery risks.

We greatly value our long-standing supply chain. In 2024, we worked with more than 25,000 suppliers or subcontractors. Our procurement framework and e-procurement system ensured all have been risk assessed and share our Code of Conduct standards.

Our due diligence approach helps us to navigate human rights risks and uphold our standards for safe and fair workplaces, environmental protection and ethical business practices.

Protecting human rights is a cornerstone of sustainable development.

My thanks to the many stakeholders we work with who support our due diligence practices, including our clients, partners, suppliers, subcontractors, and team members.

Our combined efforts contribute to making a difference for vulnerable people and enhance the far-reaching benefits our projects and operations deliver for our communities and future generations.



Juan Santamaria

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



Glenrowan Solar Farm, Victoria, UGL and PACIFIC PARTNERSHIPS

1. ASSET, INFRASTRUCTURE AND RESOURCES LEADER

CIMIC Group is an engineering-led services, construction and natural resources leader with a history dating back to 1899.

Powered by 39,000 people, and pioneering technology and engineering, we deliver high-value and sustainable solutions across the lifecycle of assets, infrastructure and resources projects in around 20 countries.

HOCHTIEF Australia, CIMIC and the head company of each of our Operating Companies being CPB Contractors Pty Limited (including Broad Construction Pty Ltd), UGL Pty Limited, Sedgman Pty Limited, Thiess Group Holdings Pty Ltd (60% ownership), Pacific Partnerships Pty Ltd, EIC Activities Pty Ltd, Devine Pty Ltd, Leighton Properties Pty Limited and IDD Tech Pty Ltd are all incorporated in Australia, apart from Leighton Asia Limited which is incorporated in Hong Kong.

Our mission is to generate sustainable returns by delivering innovative and competitive solutions for clients and safe, fulfilling careers for our people. We strive to be known for our principles of Integrity, Accountability, Innovation and Delivery, underpinned by Safety.

Our first priority is to ensure the safety of our teams and the people we interact with, including our clients, partners, suppliers, and communities.



CIMIC Group simplified structure of key operations



2. OUR OPERATIONS AND SUPPLY CHAIN

CIMIC Group has an international presence with revenue of \$16.8 billion for FY24¹² and work in hand of \$40.2 billion.¹³ Our diversified businesses are industry leaders in a range of market segments – engineering and construction, integrated solutions, natural resources, and investments.

Across these segments, we are delivering solutions for core and high-growth sectors and using our complementary and integrated capabilities to provide seamless whole-of-life solutions.

Our collective experience spans sectors such as advanced technology (including data centres, telecommunications and software), power and renewable energy (including solar farms, batteries and transmission lines), sustainable mobility (metro and light rail networks), social infrastructure (including schools, hospitals and defence infrastructure), critical minerals and natural resources (including commodities

for the energy transition) and large-scale civil engineering (including water and wastewater treatment plants, major road and rail developments, airports, building, and tunnelling).

Within these, our capabilities deliver the full spectrum of services, from feasibility, design, planning and investment; to manufacturing and construction; to operations, maintenance, upgrades and asset management; to rehabilitation and decommissioning.

We have built our reputation as a trusted partner on the quality, reliability and value our businesses deliver.

Our Group's safety record, financial strength, risk management processes, engineering capabilities, digital innovation, and sustainability performance position us to secure large complex projects and exceed client and community expectations.

¹² Revenue (ie. statutory revenue) for FY24 includes eight months of the Thiess Group result following acquisition of an additional 10% of the equity in the Thiess Group (increasing ownership to 60%) in April 2024. Consequently, CIMIC has consolidated the Thiess Group in our financial accounts.

¹³ Work in hand includes CIMIC Group's share of work in hand from joint ventures and associates.

KEY OPERATIONS

Engineering and construction



CPB Contractors

CPB Contractors is the Australasian construction company of the CIMIC Group, delivering complex infrastructure projects across all sectors of the construction industry for more than 90 years. Supported by industry-leading delivery systems that it combines with best-practice construction methodology and digital engineering expertise, CPB Contractors' experienced project teams are trusted to deliver roads, rail, tunnelling, defence, building, health, renewables and energy resources infrastructure.



Leighton Asia

Leighton Asia is the contractor behind some of Asia's most prestigious projects, delivering a portfolio of high-profile infrastructure projects throughout Asia. Established in 1974, headquartered in Hong Kong, Leighton Asia is a proven leader in the delivery of complex tunnel, rail and road networks, and a comprehensive range of services spanning key sectors including civil engineering, technology and digital engineering, MEP and building.

Integrated solutions



UGL

UGL is a specialist end-to-end engineering, services and operations provider, with a rich history dating back to 1899. Helping to play a role in people's lives every day, UGL keeps Australia moving through its transport manufacturing, maintenance and operations offering, and supports the energy sector through its renewables, power generation, resources and transmission operations. UGL is shaping the country through major infrastructure projects and preparing for the future with its new energy, Defence, telecommunications and technology expertise.



Sedgman

Sedgman is a leading provider of integrated minerals processing solutions. Its 250-strong portfolio of high-performing processing plants and supporting mine site infrastructure showcases the value of our specialist focus. Since 1980, Sedgman has advanced the standard of excellence and innovation for clients across diverse commodities including iron ore, precious and base metals, and industrial and critical minerals.

Operating locations

CIMIC Group operating locations for its key operations:

- CPB Contractors – Australia, New Zealand, Papua New Guinea
- Leighton Asia – Hong Kong, India, Indonesia, Macau, Malaysia, Singapore, the Philippines
- UGL – Australia, New Zealand
- Sedgman – Australia, Canada, Germany, United States of America
- Thiess Group – Australia, Canada, Cambodia, Chile, India, Indonesia, Mongolia, United States of America
- Pacific Partnerships – Australia, New Zealand
- EIC Activities – Australia, New Zealand, the Philippines



Natural resources



Thiess

The Thiess Group is a leading mining, civil and services provider, operating across Australia, Asia and North and South America with over 14,000 workers. Its core capabilities extend across engineering, asset management, extraction and haulage, civil construction, crushing and processing, and rehabilitation. The Thiess Group partners with clients and communities across geographies, commodities and cultures to deliver scalable solutions in mining and beyond, with the goal of positioning the Thiess Group at the forefront of sustainable mining.

Corporate and investment



Pacific Partnerships

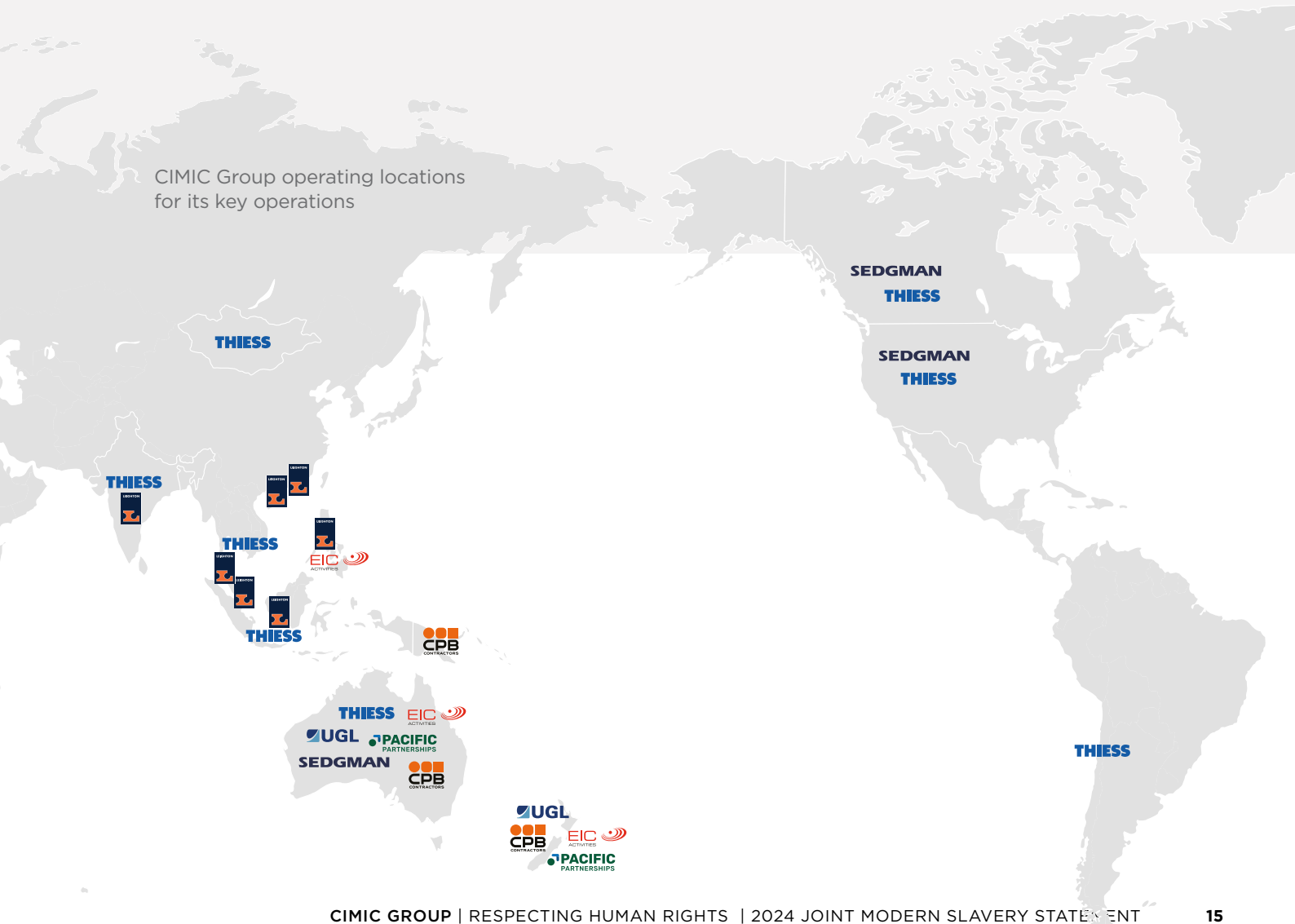
Pacific Partnerships is a leading infrastructure developer. It drives innovative collaboration across CIMIC Group's collective expertise to create, fund, own, deliver and operate sustainable solutions that unlock benefits for our communities and for the future. In a world rich with challenges and opportunities, Pacific Partnerships develops and delivers bold solutions that underpin prosperity, productivity and liveability of our cities and their people.



EIC Activities

EIC Activities is CIMIC Group's engineering and technical services business. Our engineering, design and risk mitigation expertise provides CIMIC Group with a competitive advantage for winning and delivering profitable projects that also generate value for clients. EIC Activities ensures that the Group's collective experience, technical capabilities, innovations and leading-edge technology applications are leveraged to deliver our clients' objectives.

CIMIC Group operating locations
for its key operations



SUPPLY CHAIN

In 2024, our Group spent approximately \$12.3 billion on procurement of supplies and services, locally, nationally and internationally, for our projects and businesses. Of approximately 25,000 direct suppliers we worked with, all have been risk assessed and 92% were local to our projects.¹⁴ We procured \$210 million worth of goods and services from Indigenous businesses in Australia.

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.

Our key areas of spend include:

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

We generally do not manufacture our own products except where CPB Contractors produces precast concrete components for construction projects, UGL manufactures, upgrades and maintains rolling stock and some rail specific componentry, and the Thiess

Group rebuilds and reconditions major components and equipment for mining. 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.

In the area of IT, CIMIC Group has dedicated internal resources that support Corporate and project requirements including ONE IT, our unified technology function, and IDD Tech. IDD Tech is our commercial software development company which develops Integrated Digital Delivery software solutions for CIMIC Group and clients across the construction, resources and services sectors.

Our focus on responsibly sourcing products and services improves sustainable project outcomes.

For the local community, our engagement of local suppliers generates jobs and business opportunities which stimulate regional economic growth and build a skills legacy that will support future development.

Across Australia, in metropolitan, regional and remote areas, Indigenous businesses are providing us with services including crane and lifting services, civil works, plumbing, environmental and remediation works, fleet management and transport, technology solutions, waste management, labour hire, recruitment, and training, as well as PPE supplies, printing, cleaning and catering – to name just a few.



Integrated solutions, SEDGMAN

¹⁴ This calculation is made on a country-to-country basis. The percentage is calculated by deeming any supplier within the country that is using an ABN (or equivalent) associated with that country as a local supplier.

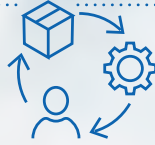
Supply chain 2024



Total direct
suppliers
25,524



Local
suppliers
92%



New suppliers
onboarded
7,010



\$ Indigenous
supplier spend
(Australia)
\$210m

Result includes the Thiess Group.
CIMIC Group achieved a **24%**
increase on 2023 Indigenous
spend including the Thiess Group
and an **8%** increase on 2023
excluding the Thiess Group.



Engineering and construction, CPB CONTRACTORS



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 a potential exposure to modern slavery risks, 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 Risk Assessments (HRRAs) (previously called Human Rights Impact Assessments), which

commenced in 2017, use of our externally provided third party screening tool and ongoing operations and 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.

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.



Natural resources, MACA, THE THIESS GROUP

OPERATIONS RISK

Complementing CIMIC Group's governance and due diligence processes, we continue to use HRRAs to extend our identification and understanding of human rights and modern slavery risks in our operations. More detail about our HRRRA program is set out in Section 4 *Assessing and addressing the risk of modern slavery*.

In 2024, we continued the review of human rights risks in our operations by performing country-by-country analysis in key human rights risk areas, leveraging our Human Rights Country Analysis which was conducted in 2021 and refreshed in 2023.

HUMAN RIGHTS COUNTRY ANALYSIS

Review of countries where we operate

The human rights country analysis, established in collaboration with HOCHTIEF AG in 2021 and refreshed in 2023, was led by an independent agency.

The analysis assessed the level to which key 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
 - ▲ Ratification of United Nations Treaties
 - ▲ Presence in United Nations Committees
 - ▲ Reporting to the United Nations Committees
- International Labour Organisation
 - ▲ Ratification of ILO Fundamental Conventions
- Regional Human Rights Framework
 - ▲ Regional Systems of Human Rights
- National Human Rights Indexes
 - ▲ Fragile States Index
 - ▲ Corruption Perception Index
 - ▲ Modern Slavery Index
 - ▲ Death Penalty Index
 - ▲ Average Working Hours (ILO)
 - ▲ Global Gender Gap Ranking 2020
 - ▲ Global Rights Index 2021.

In 2024, CIMIC Group expanded and built upon these frameworks by further examining priority human rights risk areas for each country and industry in which we operate, having regard to local laws, regulations, the economic and social environment, and practices which apply to each area. These risk areas are consistent with our shareholder, HOCHTIEF AG's, scope of human rights risk areas under the German Supply Chain Due Diligence Act (LkSG) and include the following:

- Forced labour and all forms of slavery
- Occupational safety and health and work-related health hazards under applicable local laws
- Freedom of association under applicable local laws
- Right to equality and non-discrimination in employment under applicable local laws
- Land rights and pollution under applicable local laws
- Inappropriate use of security forces under applicable local laws
- Conditions of work, right to life, liberty and security under applicable local laws

In 2024, we continued to review and assess our human rights risk profile with Human Rights Risk Assessments (HRRAs) conducted by our key Operating Companies in selected countries of operation. See Section 4 *Assessing and addressing the risks of modern slavery* for further information about our HRRAs program.

Our ongoing risk 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 and monitoring appropriate controls to prevent, mitigate or respond to each risk.

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; solar panel suppliers 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 other onboarding and/or prequalification steps and using, wherever possible, a suite of template commercial contracts which include template clauses on modern slavery and indirect supplier controls. These are detailed in Section 4.



Integrated solutions, Sedgman

DIGITALISATION SUPPORTING SUPPLY CHAIN DUE DILIGENCE AND MANAGEMENT

Leveraging integrated technologies to understand and manage our supply chain

CIMIC Group is using its integrated digital delivery capability to continuously improve information and data management, operational performance and ESG outcomes. This includes linking a range of digital solutions to support our due diligence processes and supply chain governance.

Our approach includes using a mix of leading industry tools and developing our own proprietary solutions to provide greater transparency, simplicity, and control in the management of our supply chain. Examples from our suite of tools are described below.

Supplier screening and onboarding

We use an external provider's screening tool to evaluate and monitor vendors, suppliers and business partners for risk factors. These include, but are not limited to, legal status, watchlists (e.g. sanctions / enforcements / PEPs), global slavery index, corruption perception index, country risk, industry risk, subject entity risk and any adverse media, including in areas such as human rights, health and safety, impacts on the environment, regulatory matters and other risk factors. Once we accept a third party, the tool enables ongoing monitoring of that third party for changes in key risks. See further detail in this statement, *Assessing and addressing the risk of modern slavery – Procurement*.

Supplier management

Our supply chain visibility is enhanced through a custom-built supplier management and procurement software solution. This secure, cloud-based application supports procurement, from supplier registration to contract award. It also serves as our register of suppliers. The software's features include financial and non-financial evaluations. It provides a centralised supplier database which can be accessed and updated by projects.

The data we collect from suppliers via this platform in the way of questionnaires and forms offers valuable insights into potential supplier risks, such as health and safety, quality, financial risks, compliance, and ESG factors. This key information aids our due diligence processes. The supplier database also helps us to engage efficiently with local, social and Indigenous suppliers to ensure they are provided opportunities to work with the Group.



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.

Summarised in Table 1 and detailed on the following pages, 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, investigation, 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.

Onboarding acquired businesses

CIMIC Group's business strategy includes extending our capabilities and opportunities for continued growth through targeted mergers and acquisitions.

Our integration processes align policies and procedures, including in the area of modern slavery, embedding our integrated governance, compliance, procurement and people frameworks. Throughout the



Natural resources, THIESS, THE THIESS GROUP

transition we focus on safety, continuity of service to clients and supporting new and existing team members through the change to continue developing rewarding careers.

During the reporting period, the Thies Group acquired PYBAR¹⁵ (May 2024), a specialist in metalliferous underground hard rock mining, as part of its strategy to diversify its commodities into metals and critical minerals, and the services it offers. Sedgman acquired Prudentia Engineering (February 2024) and MinSol Engineering (April 2024), completing its strategy to become a full service, global provider in the extraction and refining of minerals essential to the rapidly growing clean energy technologies. Leighton Asia acquired

Maverick United (December 2024), growing its services in the advanced technology sector.

For each of the acquisitions, our integration processes commenced upon acquisition, continued throughout 2024 and are ongoing in 2025.

Additionally, CPB Contractors integrated its boutique, specialist building subsidiary Broad Construction into the contractor's national building business to bring more than 30 years' experience and expertise in the vertical building sector together under one team. Broad Construction is already integrated into our modern slavery processes and practices as a member of the CIMIC Group.



¹⁵ As required under Australia's *Modern Slavery Act 2018*, PYBAR produced its own standalone Modern Slavery Statement for the [1 January - 31 December 2020 reporting period](#). Following its acquisition by MetaRock Group Limited in 2021, PYBAR reported in the MetaGroup Ltd Joint Modern Slavery Statement for the [1 July 2020 - 30 June 2021 reporting period](#).



Graduate Program, CIMIC GROUP



Table 1: Key elements of CIMIC Group’s integrated approach to assessing and addressing modern slavery risks

This table highlights key elements of our governance, compliance, procurement and people frameworks which guide and support how we assess and address modern slavery risks. They strengthen Group alignment, risk management, and how we engage with our people and stakeholders, monitor grievances and pursue continuous improvement.

	GROUP ALIGNMENT	RISK MANAGEMENT	ENGAGEMENT, MONITORING AND CONTINUOUS IMPROVEMENT
 GOVERNANCE	<ul style="list-style-type: none"> • Principles • Code of Conduct • Board and Committees • Group Policies and Procedures 	<ul style="list-style-type: none"> • Risk management framework • Management systems • Board Charter • Board Ethics, Compliance and Sustainability Committee Charter • Group Governance System 	<ul style="list-style-type: none"> • Business Conduct Representatives • Reportable Conduct Groups • Human Rights Coordinators • Board Ethics, Compliance and Sustainability Committee • Ongoing liaison with Government, industry and regulators
 COMPLIANCE	<ul style="list-style-type: none"> • Policies and procedures relevant to human rights and modern slavery issues, such as: <ul style="list-style-type: none"> ▲ Code of Conduct ▲ Human Rights Policy and Procedure ▲ Approval to Operate Internationally Policy ▲ Risk Management Policy ▲ Group Tendering Policy and Procedure ▲ Third Parties Policy ▲ Procurement Policy ▲ Sustainability Policy ▲ Health and Safety Policy ▲ Whistleblower Policy ▲ Anti-Bribery and Corruption Policy ▲ Gifts and Hospitality Policy ▲ Group Compliance Policy and Procedure 	<ul style="list-style-type: none"> • Board Ethics, Compliance and Sustainability Committee reporting and review • Working groups and management committees supporting Group alignment and compliance: <ul style="list-style-type: none"> ▲ Compliance Working Group ▲ Human Rights Committee ▲ Sustainability Forum ▲ Tender Risk Management Committee ▲ CIMIC Disclosure Committee ▲ Diversity and Inclusion Forums 	<ul style="list-style-type: none"> • Grievance and reporting mechanism <ul style="list-style-type: none"> ▲ Complaints and Investigation Procedure and Whistleblower Policy ▲ Business Conduct Representatives and Reportable Conduct Groups at CIMIC and Operating Company levels ▲ Independent Ethics Line • Annual / ad hoc compliance assurance reviews • Internal audit activities



Graduate Program, CIMIC GROUP

	GROUP ALIGNMENT	RISK MANAGEMENT	ENGAGEMENT, MONITORING AND CONTINUOUS IMPROVEMENT
 PROCUREMENT	<ul style="list-style-type: none"> • Third Parties Policy • Procurement Policy • Delegations of Authority 	<ul style="list-style-type: none"> • Supply chain identification, assessment and management of risks relating to modern slavery by processes such as: <ul style="list-style-type: none"> ▲ Supplier registration ▲ Externally provided third party screening tool, onboarding, and ongoing monitoring for any changes in key risks ▲ Third Party Business Integrity Declaration Form ▲ Supplier pre-qualification questionnaires ▲ Template commercial contracts 	<ul style="list-style-type: none"> • Supplier access to grievance and reporting mechanism, including the independent Ethics Line • Procurement policy internal audits
 PEOPLE	<ul style="list-style-type: none"> • People policies including <ul style="list-style-type: none"> ▲ Diversity and Social Inclusion Policy ▲ Family and Domestic Violence Policy ▲ Flexible Working Policy ▲ Health and Safety Policy ▲ Human Rights Policy, Procedure and other supplementary tools ▲ Parental Leave Policy ▲ Recruitment Policy, procedures and management systems ▲ Redundancy Policy ▲ Remuneration Policy ▲ Whistleblower Policy ▲ Workplace Behaviour Policy • Complaints and Investigations Procedure 	<ul style="list-style-type: none"> • Human Rights Risk Assessments 	<ul style="list-style-type: none"> • Education and training <ul style="list-style-type: none"> ▲ Leadership and culture ▲ Code of Conduct training ▲ Compliance training ▲ Human rights and modern slavery awareness training ▲ Workplace behaviour and equal employment opportunity training • Reporting and grievance framework • Complaints investigation procedures • People policies internal audit

GOVERNANCE AND LEADERSHIP

CIMIC Group's governance framework is founded in our Principles of Integrity, Accountability, Innovation and Delivery, underpinned by Safety.

Our governance framework and Code of Conduct establish the overall operating parameters for our entities and guide our people and decisions.

Code of Conduct

Our Code of Conduct 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 unlawful 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.

Governance framework

We substantially retain the governance of a listed company and have a highly experienced Board and management team.

Ultimate accountability for CIMIC Group rests with our Board. The Board delegates specific responsibilities to the Ethics, Compliance and Sustainability Committee (ECSC) and management, under the leadership of the Chief Executive Officer.

Our Code of Conduct, Board Charter, ECSC Charter, Delegations of Authority and Policies¹⁶ establish that the Board, ECSC and management bodies have oversight of sustainability-related impacts, risks and opportunities (including environment, social and governance matters related to human rights and modern slavery), with a role in setting targets and reviewing progress.

Management's preparation and analysis of quarterly and annual reporting and accompanying papers for the ECSC and Board's review and approval, is key to ongoing review of our sustainability strategy, targets, requirements and performance.

Thiess Group governance

The Thiess Group has its own independent governance structure which is aligned to CIMIC's governance structure and adapted where necessary to suit their business.

The Thiess Group Board has overall responsibility for setting the company's sustainability and governance approach. The governance structure includes cross-functional Board Committees for strategic oversight and input, Management Committees to support the CEO and Executives, and Working Groups to support the business. Each level of the governance structure provides input into critical sustainability risks and opportunities.

The Thiess Group's governance framework and governance system architecture include policies and charters, standards, company-wide procedures, tools and knowledge, and project-wide procedures, tools and knowledge. For further information about the Thiess Group's governance please see the [2024 Thiess Group Sustainability Report](#) and [Thiess Group | Corporate Governance](#).

For further information about the Thiess Group's approach to assessing and addressing modern slavery risks see their [2023 Joint Modern Slavery Statement](#).

CIMIC Group's Board

CIMIC Group's Board is responsible for the overall strategy, governance and performance of CIMIC, and oversees a tiered system of responsibility. The Board's role and responsibilities are established by the CIMIC Group Board Charter which establishes that the Board and each Director will at all times have regard to the Constitution and the Group's frameworks, policies, codes, standards, rules and processes, the Corporations Act, and all other applicable laws.

Ethics, Compliance and Sustainability Committee

The ECSC assists the Board in fulfilling its corporate governance and oversight responsibilities, and compliance with all applicable legal and regulatory requirements and internal policies.

The ECSC monitors and reviews the Group's ethical standards and practices and compliance with the Group Code of Conduct, Workplace Behaviour Policy, Whistleblower Policy, and Anti-Bribery and Corruption Policy. This includes consideration of impacts, risks and opportunities, compliance and performance in areas such as health and safety, diversity and social

¹⁶ CIMIC Group's Code of Conduct, Constitution, Board Charter, ECSC Charter, External Auditor Independence Charter and key policies are available on our website's Governance pages at [CIMIC Group | Our Group](#)



Integrated solutions, UGL

inclusion, human rights including modern slavery, the environment, sustainability, and business conduct.

Chief Executive Officer and Executive Leadership

The CIMIC Board delegates responsibility for the day-to-day management of CIMIC to the CEO. Responsibilities include developing, presenting and proposing the strategic direction for the business, and achieving the strategic and business objectives for the Group. The CEO is supported by CIMIC's Executive Leadership Team.

The Operating Companies operate under the direction and guidance of their leadership teams as a distinct business managed by a head corporate entity. Operating Company Executive and Functional leads report to CIMIC's Executive and Functional members as required.

CIMIC Group's Executive Leadership Team, and the leadership team of each Operating Company use our governance framework to drive due diligence and compliance, in support of consistent sustainable value creation for our clients and communities, and our business.

Governance is further supported by CIMIC's and each Operating Company's Business Conduct Representative¹⁷ (BCR) and their Reportable Conduct

Groups¹⁸ (RCG), Human Rights Coordinators at CIMIC and each Operating Company, and the Group's Internal Audit and Compliance functions alongside a network of cross-Operating Company working groups and management committees (described below).

Under our Internal Audit Charter, our Internal Audit function reports to the CIMIC Board and the Chief Executive Officer. The function operates in two service streams, Group Internal Audit and Forensics and Data Analytics and has full access to all functions, records, property and personnel of the Group. It provides independent and objective assurance on the adequacy and effectiveness of the Group's systems for risk management, internal control and governance, along with recommendations to improve the efficiency and effectiveness of these systems and processes.

The Compliance function oversees requirements to adhere to both external and internal compliance obligations and mitigate compliance risk, guided by our Group Compliance Policy and Procedure.

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

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

18 The Reportable Conduct Group comprises the Chief Executive Officer or Managing Director, Chief Financial Officer, General Counsel, and Head of People.

Key policies

CIMIC's governance framework provides a comprehensive series of integrated frameworks, policies, procedures, and guidelines for the Group. These span areas such as corporate governance, compliance, ethics, people, safety, environment, sustainability, legal, communications, finance, operations including tendering and procurement, strategy, mergers & acquisitions, risk, information technology and innovation. Key policies related to human rights and modern slavery include:

- **Group Human Rights Policy and Procedure** – provides the framework to assess and address the risks of human rights, including modern slavery, sets out accountabilities, our operational and supply chain risk controls and the reporting process to which we adhere. The Policy, and its supporting Procedure, outline CIMIC Group's commitment to respect applicable internationally recognised human rights.
- **Group Third Parties Policy** – sets out the requirements for business relationships with third parties across the Group, including clients, joint venture partners, subcontractors, consultants and suppliers, agents or intermediaries. The Policy supports our steps to ensure third party risks are appropriately identified, assessed and mitigated where appropriate before entering into formal business relationships. It also helps us to ensure risks are appropriately monitored and managed during the course of those relationships.
- **Group Risk and Risk Management Policies** – sets out the requirements to identify, analyse, evaluate, treat, monitor, review and report risks that have the potential to impact the Group. This includes our people, third parties, the general public and communities in which we work, and the environment. It also includes our operations, financial outcomes, and reputation or other impacts that the Group is exposed to. Our risk management framework¹⁹ is tailored to our business, embedded largely within existing processes and aligned to our objectives, both short and longer term.
- **Group Approval to Operate Internationally Policy** – seeks to ensure that we do not operate in countries that could pose significant integrity, legal, financial, operational, reputational, security and other business risks to the Group. The Policy mandates the use of a traffic light system to rate a country's approval status or its prospective risk, using a Country Risk Assessment template. We maintain a register of approved countries and integrate its use with our Delegations of Authority and Tendering Policy to support risk assessment and policy compliance.
- **Group Sustainability Policy** – sets out commitments and objectives for sustainability across the Group, including the integration of environmental, social (including human rights and modern slavery matters) and governance factors into decision making and management of sustainability risks and opportunities.
- **Group Tendering Policy and Procedure** – documents the requirements for pursuing new work opportunities. Key elements of our risk assessment process for tendering include due diligence to assess country and partner risks and ensure the Group is not exposed to any integrity risks (including human rights and modern slavery risks), or reputational damage, a four-stage gate approval process, financial assessments, commercial and contract risk assessments, and the requirement to form a Tender Risk Management Committee to review important opportunities. All contracts must be approved in accordance with the Group Delegations of Authority which sets out the authority levels that have been delegated to the executive management and employees of CIMIC Group across aspects of our business.
- **Group Compliance Policy and Procedure** – sets out the Group requirements and processes to adhere with both external and internal compliance obligations and mitigate compliance risk to ensure the Group's mission and principles are achieved.

¹⁹ Our risk management processes are aligned to the requirements of the ISO 31000.





Engineering, EIC ACTIVITIES

CIMIC GROUP'S HUMAN RIGHTS POLICY AND PROCEDURE

Enhancing consultation and engagement across CIMIC Group

In 2024, CIMIC Group expanded the scope of its Modern Slavery Policy and Protocol (developed in 2021) to establish a Human Rights Policy and supporting Procedure, in line with evolving local and international developments.

Our Human Rights Policy and Procedure outline CIMIC Group's commitment to respect applicable internationally recognised human rights. They provide the framework to assess and address human rights risks in our operations and supply chains to avoid causing or contributing to adverse impacts on the human rights of people involved in our global operations.

The Policy and Procedure integrate with, and leverage, CIMIC Group's broader governance system and facilitate ongoing consultation across the Group for compliance, continuous learning and improvement.

The Human Rights Policy sets out the CIMIC Group accountabilities and commitments.

Under the Human Rights Procedure, our Operating Companies appoint a Human Rights Coordinator, maintain a Human Rights Action Plan for assessing and addressing human rights risks (revised annually), and participate in the Group Human Rights Committee.

Our Human Rights Action Plan template guides Operating Companies on minimum operational and supply chain control requirements to be addressed in the plan. Examples include:

- a Human Rights Risk Assessment (HRRRA) plan to cover each country of operation over a specified time period
- use of the externally provided third party screening tool to assist in screening suppliers and third parties as part of the supply chain due diligence process
- use of CIMIC Group template contracts for goods or services procured wherever possible, including standard clauses with respect to modern slavery
- conducting partner and country risk assessments when pursuing potential work opportunities, which includes consideration of modern slavery risks
- employee recruitment and selection practices in accordance with relevant CIMIC Policies and Procedures
- mandatory human rights and modern slavery awareness training for employees.

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 the Human Rights Policy, Anti-Bribery and Corruption Policy, Third Parties Policy, Group Procurement Policy, Health and Safety Policy, Workplace Behaviour Policy and Whistleblower Policy.

Executive Management's oversight of sustainability and their communication of ESG matters, including human rights and modern slavery matters, to the ECSC and Board is further supported by information and insights provided by our comprehensive data management and reporting regime and specialist committees, working groups and functions which implement due diligence and assess the results and effectiveness of policies, actions, metrics and targets. These include:

- **Reportable Conduct Groups (RCG)** – are in place at CIMIC and each Operating Company. They review ethical matters, and periodically (but at least quarterly) the CIMIC RCG is provided with reports about matters reported, actions taken, and the success or otherwise of systems in place to support compliance with the Group Code of Conduct. The CIMIC RCG reports quarterly to the ECSC.
- **Human Rights Committee** – comprising representatives from CIMIC and each Operating Company, including Human Rights Coordinators, and representatives from functional areas relevant to the subject topics within the Committee's scope, for example human resources, legal, compliance, procurement, safety and communications representatives. The objective of this Committee is to discuss, assess and plan for relevant activities associated with addressing and assessing human rights risks across the Group. Activities are guided by the Human Rights Policy and Procedure.
- **Compliance Working Group** – consisting of the Group Manager Compliance and each of the Operating Companies General Counsels (or their delegates), which reviews and discusses compliance activities and reporting requirements. Activities are guided by the Compliance Policy and Procedure.
- **CIMIC Disclosure Committee (CDC)** – comprises CIMIC's Disclosure Officers and the Group General Counsel and is chaired by the Chief Financial Officer. The CDC reviews information for the purpose of determining whether it should be disclosed and oversees compliance with CIMIC's ongoing disclosure requirements. To support the CDC in identifying information that may need to be disclosed each Operating Company has Information Disclosure Officers, the Managing Director and Chief Financial Officer.
- **Tender Risk Management Committee** – involves CIMIC and Operating Company management in regular reviews of tenders, contracts, and project delivery. Reviews ensure development and submission of competitive sustainable solutions and proactive management of risk and projects' financial, commercial and sustainability performance. Activities are guided by the Risk Management, Approval to Operate Internationally, Sustainability, Tendering, Dealing with Third Parties, Environment, and Quality Management Policies.
- **Sustainability Forum** – led by CIMIC, brings all Operating Company sustainability leads together in a monthly forum, and focuses on sustainability strategy, policy, risk mitigation, controls, digitalisation, reporting, innovation and continuous improvement. Activities are guided by the Business Resilience, Environment, Health and Safety, Diversity and Inclusion, Procurement, Risk Management and Sustainability Policies.
- **Diversity and Inclusion Forums** – are in place at each Operating Company. They set strategy and review social performance in areas including gender equality, social inclusion, Indigenous and First Nations participation and local and national inclusion. Activities are guided by our full range of people policies including Diversity and Inclusion, Health and Safety, Recruitment and Professional Development.



Engineering and construction, CPB CONTRACTORS

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 corruption, bribery, conflicts of interest and human rights infringements.

Our grievance and reporting mechanism is accessible, confidential and responsive.

Our Complaints and Investigation Procedure, Workplace Behaviour Policy, Privacy Policy and Whistleblower Policy are complementary. They work together with our staff whistleblower training, the confidential, independent 24/7 Ethics Line and our processes and approach to investigating, addressing and managing reports or complaints received to encourage and reliably manage reporting of any potential unethical practice.

Our Workplace Behaviour Policy outlines general standards of workplace behaviour and defines what behaviours are unacceptable in our workplaces including bullying, harassment, sexual harassment,

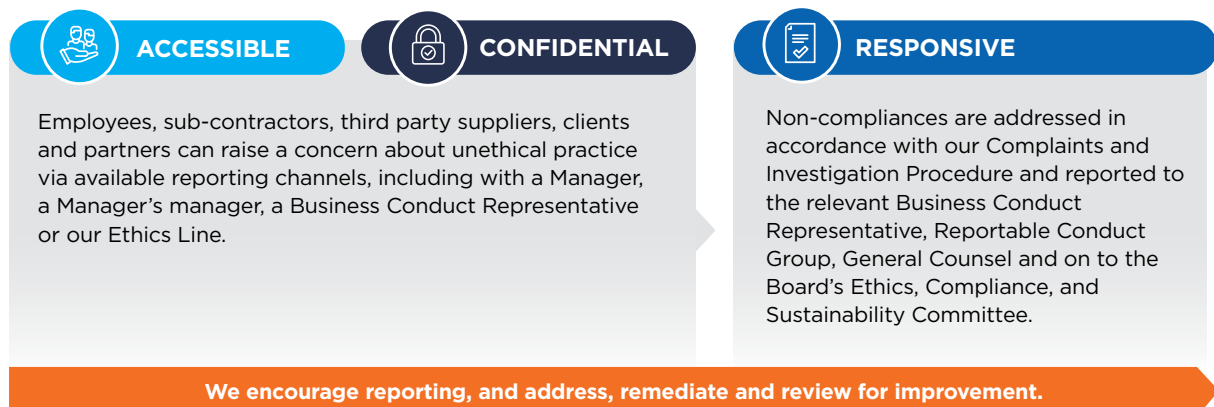
hostile workplace environments, discrimination, victimisation, and vilification.

Our Whistleblower Policy defines who is a whistleblower, how to make a disclosure, safeguards for confidentiality, anonymity, and personal information. It also outlines how whistleblowers are protected. Whistleblowers can remain anonymous, and disclosures may be referred to the authorised Business Conduct Representative (BCR)²⁰ who ensures that any disclosure is investigated appropriately, promptly and confidentially.

CIMIC and each Operating Company's BCR and Reportable Conduct Group (RCG), further support engagement, monitoring compliance and continuous improvement across the Group.

The Workplace Protection Officer is also responsible for safeguarding the interests of any whistleblower within the organisation.

In 2024, the Group enhanced staff e-learning modules including modules for Code of Conduct, Workplace Behaviour & Equal Employment Opportunity, and Whistleblower training.



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

PROCUREMENT

Our procurement framework is key to building and maintaining a reliable and trusted supply chain, and proactively identifying and managing risks throughout the term of each contract.

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

Activities include identifying and assessing risks by conducting comprehensive vetting of subcontractors, suppliers and third parties engaged by our businesses.

As part of the framework, the Group's Third Parties Policy, Procurement Policy and Human Rights Procedure incorporate:

- the management of risks, including specific modern slavery due diligence risks and requirements, into our supplier registration (a business integrity check)
- the screening and onboarding process
- a suite of standard template commercial contracts to be used wherever possible
- a set of requirements for suppliers' management of their suppliers.

²⁰ The Business Conduct Representative is a senior person within the Legal function who supports the operation of the Code of Conduct.



Integrated solutions, SEDGMAN

Supplier screening and onboarding

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

This tool is used for third party risk screening purposes involving a comprehensive evaluation of risk factors, leveraging information from various global indices and databases, including but not limited to risks relating to:

- legal status
- watch-lists including sanctions and enforcements, adverse litigation and Politically Exposed Person (PEP) lists
- country and industry risks
- modern slavery risks, bribery and corruption due diligence by screening the Corruption Perception Index and the Global Slavery Index and adverse media.

The tool leverages information from the Global Slavery Index prepared by the Walk Free Foundation, and records of adverse media are collected from various sources – adverse news includes modern slavery allegations and breaches.

Based on a multi-factor risk assessment, each supplier is allocated a risk-rating which triggers additional review and assessment and further investigation and due diligence where applicable. Identified risks may lead to the preparation of corrective action plans, imposition of conditions, or in some cases, the supplier may be rejected from working with CIMIC Group entities. Accepted suppliers and other third parties are subject to ongoing monitoring in the tool for any changes in key risks, for example a change in an entity's legal status or any watchlist changes.

Since its implementation, and as at December 2024, the CIMIC Group, including the Thiess Group, has risk

assessed approximately 54,000 third parties including suppliers.²¹ In 2024, we onboarded approximately 7,000 new suppliers.

Supplementing supplier screening via the tool, as part of the supplier registration and pre-qualification process, our Operating Companies require suppliers to complete template supplier pre-qualification questionnaires. Information provided via the questionnaire assists with informing our businesses of any potential vendor risks in areas such as health and safety, quality, financial risks, compliance, and relevant modern slavery and ESG factors.

Suppliers are required to comply with applicable laws and the CIMIC Code of Conduct (or their own Code containing equivalent standards of behaviour), and to complete a Third Party Business Integrity Declaration Form confirming (among other things):

- no modern slavery, human trafficking or forced or unlawful child labour has been used anywhere by the third party or, to the best of the third party's knowledge, by any direct contractor or supplier to the third party
- they have not been subject to or received any prosecutions, regulatory notices, tendering restrictions, sanction notices, litigation or arbitration concerning allegations of fraud, bribery, corruption, environmental, safety, modern slavery or human rights breaches or violations or other unethical business practices by their employees or subcontractors and suppliers
- they have a compliance management program in place to ensure compliance with business integrity laws, regulations and standards.

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.

²¹ In addition to the approximately 43,600 suppliers and other third parties who have been accepted by CIMIC (including the Thiess Group), approximately 4,000 applications are pending and CIMIC has rejected approximately 4,000 applications on various grounds, which can include modern slavery. Approximately 2,000 have expired.

The Third Party Business Integrity Declaration Form is designed to promote a culture of integrity and compliance with the CIMIC Group Code of Conduct by our third parties.

CIMIC requires third parties engaged by the Group to complete this Declaration Form as part of onboarding.

In 2024, we revised the Declaration Form to incorporate additional risk areas and updated the terminology to be consistent with our broader human rights governance documents.

Template commercial contracts

Our Group Procurement Policy requires Operating Companies to engage suppliers using CIMIC Group's suite of template commercial contracts wherever possible. 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 include clauses that require suppliers to comply with the Group's Code of Conduct, ensuring alignment with the Group's expected behaviours. These clauses can be used in non-template commercial contracts where applicable.

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 contract templates 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.

THIESS GROUP ENGAGES SUPPLIERS IN HUMAN RIGHTS IMPACT ASSESSMENT IN INDONESIA

Building shared awareness and understanding of modern slavery risks with our suppliers

In 2024, the Thiess Group completed a Human Rights Impact Assessment²² (HRIA) for its Indonesian operations, engaging local suppliers in a collaborative modern slavery engagement and training initiative.

On site for the HRIA, the Thiess Group's Procurement Lead for Governance and ESG worked with the local procurement team, leveraging their knowledge of the operation's supply chain and higher risk areas to design the initiative.

The team engaged a sample of suppliers operating in consumables, security, and transportation and logistics, based on spend profile and risk level.

To support effective engagement, interview questions were drawn from the Supplier section of the Thiess Group's HRIA Assessment Tool, and the

Thiess Group's modern slavery awareness training module was tailored for the local context.

The initiative has helped the Thiess Group to better understand their suppliers' operations and supply chains, and gain an understanding of the suppliers' comprehension and perspective on human rights and modern slavery legislation, risk and requirements.

The suppliers actively participated in the training and provided verbal feedback that it had enhanced their understanding of Thiess' priorities and their ability to identify and report modern slavery risks.

For further information about CIMIC Group's Human Rights Risk Assessment program and the Thiess Group's HRIA program, see Human Rights Risk Assessments, on page 36.

²² This is the Thiess Group's equivalent of CIMIC Group's Human Rights Risk Assessments (HRRAs).

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, fulfilling careers and foster a workplace culture grounded in respect, opportunity, and local impact. We are committed to supporting gender balance, increasing Indigenous participation and supplier engagement, and creating meaningful employment in the communities where we operate.

CIMIC Group respects the rights of employees to freely associate and collectively bargain in accordance with local laws.

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:

- Diversity and Social Inclusion Policy
- Family and Domestic Violence Policy
- Flexible Working Policy
- Health and Safety Policy
- Human Rights Policy, Procedure and other supplementary tools
- Parental Leave Policy
- Recruitment Policy, procedures and management systems – with formal approval gates including verification of the candidate's identity and their right to legally work
- Redundancy Policy
- Remuneration Policy
- Whistleblower Policy
- Workplace Behaviour Policy.

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

Engineering and construction, CPB CONTRACTORS

SAFE RESPECTFUL WORKPLACES

Updating policies in step with workplace law changes

CIMIC Group continually reviews and updates its framework of policies, processes, and training programs that help to build safe and respectful work environments, free of any form of human rights and modern slavery risks.

Training programs updated and expanded in 2024 supported policy and procedure updates completed in 2023 and 2024.

Our policy and procedure updates align with changes in law and regulation, as well as evolving CIMIC processes and practices. Our training program updates raise awareness of risks, support our people with compliance, and help them to report any potential unethical practices.

Policy developments in 2023 included updating our Workplace Behaviour Policy, Complaints and Investigation Procedure, and Whistleblower Policy. In 2024, we updated and expanded our Modern Slavery Policy and Protocol to become a broader Human Rights Policy and a Human Rights Procedure.

Training advances in 2024 included:

- updating and expanding existing e-learning modules for Code of Conduct, Workplace Behaviour & Equal Employment Opportunity, and Whistleblower training
- revising and expanding our Modern Slavery training course to become Human Rights training
- implementing an additional e-learning Code of Conduct acknowledgment training module, for completion on alternate years to the e-learning Code of Conduct training.

Under our Group Code of Conduct all CIMIC Group employees have a responsibility to take active steps to be aware of, understand, and comply with all Group policies and procedures and applicable laws and regulations.

HUMAN RIGHTS RISK ASSESSMENTS (HRRAs)

Our Human Rights Risk Assessment (HRRa) program, which commenced in 2017, prioritises assessments in geographies where we have a significant workforce and/or where there are potential elevated risks.

To date, excluding the Thiess Group's Human Rights Impact Assessments (HRIA)²³ which are reported separately below, CIMIC Group has carried out HRRAs in countries including India, the Philippines, Hong Kong, Papua New Guinea and Australia.

In 2024, CIMIC Group completed HRRAs in:

LOCATION	SECTOR	OPERATING COMPANY	INITIATED
Australia	Construction – Renewable energy	UGL	2023
Malaysia	Construction – Advanced technology	Leighton Asia	2023
India	Construction – Social infrastructure	Leighton Asia	2024
Australia	Resources	Sedgman	2024

Under the Thiess Group's equivalent assessment program, HRIAs have been completed in countries including Mongolia and India.

During the reporting year, the Thiess Group completed a HRIA in its Indonesia mining operation.

In 2024, CIMIC Group, including Thiess Group, initiated the following HRRAs/HRIAs for completion in 2025:

LOCATION	SECTOR	OPERATING COMPANY	EXPECTED COMPLETION
New Zealand	Construction – Renewable energy	CPB Contractors	2025
Cambodia	Resources	Thiess Group	2025

Further HRRAs/HRIAs will be completed in 2025 and will be reported in the next Joint Modern Slavery Statement.

CIMIC Group's HRRAs/HRIAs extend our understanding of modern slavery risks and inform continuous improvement initiatives and opportunities in the different geographies and industries in which we operate.

²³ This is the Thiess Group's equivalent of CIMIC Group's Human Rights Risk Assessments (HRRAs).





CIMIC GROUP HUMAN RIGHTS RISK ASSESSMENT PROGRAM APPROACH

Managing a consistent, disciplined approach to assessing human rights risks

The self-assessment tool CIMIC Group uses to conduct Human Rights Risk Assessments (HRRAs)²⁴ is based on the Human Rights Assessment Quick Check prepared by the Danish Institute for Human Rights (DIHR).

In 2024, the self-assessment tool was revised taking into account more recent guidance, including from the United Nations and the DIHR.

The tool assesses categories including governance and leadership; people management; health and safety; community engagement; security arrangements; country risks; and procurement.

Through the process we assess 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:

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 conducting interviews with sample representative sets including:
 - 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 HRRa report and a briefing to the relevant Operating Company Executive Leadership Team members on findings, recommendations and developing action plans as required.

²⁴ Formerly Human Rights Impact Assessments.



Development and Investment, PACIFIC PARTNERSHIPS

HUMAN RIGHTS RISK ASSESSMENT PROGRAM – RECENT FINDINGS

Highlights from human rights risks assessments in our diverse geographies and sectors

The scoping of our Human Rights Risk Assessments (HRRAs) and the Thiess Group's Human Rights Impact Assessments (HRIAs)²⁵ involves identifying the key geographical, environmental, and social characteristics of the project, including consideration of different impact areas and right-holder groups, such as the local communities, location, the workers and contractors, and the suppliers and procurement.

Findings from recent HRRAs/HRIAs have highlighted that each project assessed had proactively addressed prioritised risk areas relevant to their country and industry, proactively mitigating risks.

Examples of positive findings from the HRRAs/HRIA interview sample sets showed that relevant projects met key criteria such as:

- awareness of relevant policies, including the Group Code of Conduct
- employees were comfortable raising issues of concern with their manager. They were also

confident that when issues were raised, they were taken seriously by management and appropriately investigated

- employees were aware of and confident in the health and safety systems on site, including those used to report incidents, and appropriate Personal Protective Equipment was readily and easily available to them.

Desktop research, as part of the HRRAs/HRIAs, 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.

The HRRAs/HRIA process also provides valuable input to inform continuous improvement considerations for the participating Operating Companies.

²⁵ The Thiess Group's equivalent to CIMIC Group's Human Rights Risk Assessments.

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 2024, we delivered more than 965,000 hours of training across the Group spanning multiple training courses. This was more than 25 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 learning management system, including One Learning, and by using on-site project records.

Code of Conduct and other compliance training

Our mandatory staff Code of Conduct training and other compliance training cover our business conduct policies and support our people to recognise and report risks or potential unethical practices.

Code of Conduct training and related compliance training modules include the following topics:

- Anti-bribery and corruption
- Anti-competitive conduct
- Communications with stakeholders
- Conflicts of interest
- Cultural awareness
- Diversity and social inclusion
- Family and domestic violence
- Health, safety and the environment
- Human rights
- Gifts and hospitality
- Information and record management
- IT cyber security awareness

- Preventing and responding to sexual harassment in the workplace
- Privacy
- Whistleblower legislation
- Working with third parties
- Workplace behaviour and equal employment opportunity.

The Code of Conduct training must be completed by employees within three months of commencement in a role (either as a new hire or by promotion to a relevant role) and then at least every two years thereafter.

In 2024, we introduced an additional Code of Conduct e-learning acknowledgement activity which is required to be completed in the alternate year to the above-mentioned Code of Conduct training, ensuring team members refresh their understanding of the Code of Conduct annually.

In addition to the online module, all decision-makers in senior management, and staff considered to be in high-risk roles, are required to undertake an extensive face-to-face (where possible) training session delivered by the CIMIC or Operating Company General Counsel or delegate. This training reiterates the importance of the Code of Conduct, across all key topics.

Depending on roles, some employees are also required to complete further specific training in particular subject areas, which can be face-to-face or online.

Human rights training

Supporting the governance framework, in 2024, we updated and expanded our Modern Slavery e-learning module to become a broader Human Rights training course.

This course builds upon our team's awareness and skills to identify and report human rights risks or concerns.

Communication resources and Group-wide alerts support the training, facilitating greater understanding of the issue and its importance to our business.





Integrated solutions, SEDGMAN

5. 2024 ACTIONS

In 2024, a range of actions were taken to enhance our capabilities to identify, mitigate and prevent human rights and modern slavery risks across the Group's operations and supply chain, and respond should any impacts occur.

OPERATIONS

Governance and compliance

- Continued to review and update our governance framework, including policies and procedures, to align with changes in law and regulation, and evolving CIMIC processes and practices
- Updated and expanded our Modern Slavery Policy and Protocol to become a broader Human Rights Policy and a Human Rights Procedure and rolled out the framework and its accompanying tools and training
- Continued to review, assess and understand the human rights risks for each Operating Company and the Group across our countries and industries of operation
- Completed risk analysis and assessment across key human rights risk areas, including modern slavery and child labour
- Submitted our 2023 Modern Slavery Statement to the Australian Government.

People and employment

Human Rights Risk Assessment

- Implemented our revised Human Rights Risk Assessment (HRRRA) tool which leverages best practice (including United Nations and Danish Institute of Human Rights guidance)

- Completed five HRRAs in 2024 with two more initiated in 2024 for completion in 2025 (includes the Thiess Group's HRIAs).

Training

- Delivered our ongoing Code of Conduct and broader compliance training program, supporting our people with Code of Conduct compliance and helping them to identify and report any potential unethical practices
- Implemented an additional e-learning Code of Conduct acknowledgment training module, for completion on alternate years to the e-learning Code of Conduct training
- Revised and expanded our Modern Slavery training course to become Human Rights training
- Updated and expanded existing e-learning modules for Code of Conduct, Workplace Behaviour & Equal Employment Opportunity, and Whistleblower training
- Continued to roll out Preventing and Responding to Sexual Harassment in the Workplace training modules – engaging approximately 900 senior managers and approximately 4,500 other salaried employees across the Group
- Introduced Sexual Harassment Toolbox training for wages employees at CPB Contractors.



SUPPLY CHAIN

Governance and compliance

- Updated the existing CIMIC Third Party Business Integrity Declaration Form to reflect broader human rights areas – the form is completed by suppliers and other third parties as part of the procurement/onboarding process.

Procurement

- Onboarded approximately 7,000 new suppliers
- Conducted due diligence and risk assessed 100% new suppliers, vendors and business partners using the externally provided third party screening tool. Any identified risk results were subject to further investigation and assessment, and if required, mitigation or corrective action plans were implemented.

ASSESSING EFFECTIVENESS

Our assessment of effectiveness is evidence based and includes monitoring and analysing risk analysis and compliance assurance and internal audit results, supplier screening and risk assessment, monitoring and closeout of corrective action plans, training participation rates, communications engagement, Human Rights Risk 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, including via our Human Rights Committee, Human Rights Coordinators and Compliance Working Group representatives (see section 4)
- risk analysis for our own operations and the supply chain (see section 3).



Data centre project, tree planting initiative, Malaysia, LEIGHTON ASIA

6. LOOKING AHEAD

2025 PRIORITIES

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

- enhance our understanding and knowledge of human rights and modern slavery risks, in collaboration with our Operating Companies, HOCHTIEF Australia and HOCHTIEF AG
- embed our Human Rights Policy and Procedure and associated tools
- conduct the Group's Human Rights Risk Assessment program, with HRRAs/HRIAs to be completed in 2025 in countries including Australia, Cambodia and Chile
- assess and update other human rights and modern slavery tools and controls where relevant
- review our approach to modern slavery risk management with reference to local and international developments
- risk assess new suppliers, vendors and business partners using the externally provided 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 externally provided third party screening tool to identify, among other things, any breaches, fines or sanctions in relation to modern slavery and other ESG risks
- raise our people's capability to recognise and report human rights and modern slavery risks and their awareness of CIMIC's grievance mechanism via mandatory Human Rights training and other compliance training modules
- conduct our Human Rights monitoring, risk analysis, planning and reporting activities in collaboration with our Operating Companies, whilst continuing our ACS and HOCHTIEF Group-wide alignment process
- maintain a high level of corporate governance regarding human rights.



ONGOING ENGAGEMENT AND COMMUNICATION

We will continue to engage with Government, industry, regulators, and other organisations to build awareness and understanding of human rights and modern slavery risks and work toward mitigation.

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

We value gaining and sharing insights with and from relevant organisations, including:

- Government and regulatory bodies in the different regions in which we operate – Our Legal and Compliance teams monitor for updates on the status of legislation and developments in the area of human rights and modern slavery.
- Australian Attorney-General's Department – Relevant resources are consulted where applicable to aid our understanding of or to obtain guidance in relation to modern slavery matters.
- Industry Associations – We value and consider guidance and recommendations provided by industry associations in the regions in which we operate. We hold memberships with multiple trade and industry organisations, at local, regional, national and international levels.
- External presentations, seminars or forums – Members of our People, Legal and Compliance teams attend and/or participate in external presentations, seminars or forums to improve their awareness of modern slavery and ESG risks and to embed learnings within the business.

APPENDIX

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

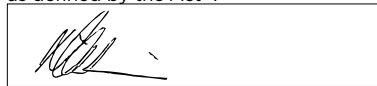
as defined by the *Modern Slavery Act 2018* (Cth)²⁶ (“the Act”) on 23 June 2025

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 Act²⁷.



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:

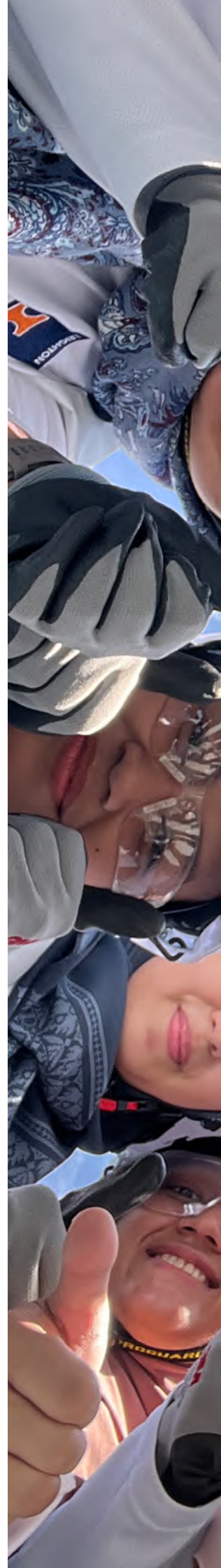
Mandatory criteria	Page number/s
a) Identify the reporting entity.	6-9
b) Describe the reporting entity's structure, operations and supply chains.	12-17
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	18-21
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.	22-41
e) Describe how the reporting entity assesses the effectiveness of these actions.	41
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).*	9
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.

26 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.

27 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.





Engineering and construction, LEIGHTON ASIA



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