

Ausenco

Modern Slavery Statement 2023



1. Background

The *Modern Slavery Act 2018* Cth (the **Act**) outlines the responsibilities of Australian companies to ensure ethical business practices by identifying and assessing the risks of modern slavery in their supply chains. Recent data from the Walk Free Foundation reveals that globally, an estimated 49.6 million individuals suffer from modern slavery as of 2021. Among these victims, 27.6 million are trapped in forced labour, 22 million endure forced marriages, and 3.9 million are subjected to state-imposed forced labour. There has been an alarming increase of 10 million people facing forced labour and forced marriages in the past five years when compared to the figures reported in 2017.

The detection of modern slavery poses significant challenges due to the deliberate isolation imposed by perpetrators. Moreover, compounding crises such as the COVID-19 pandemic, armed conflicts, and climate change have created unparalleled disruptions in employment and education. These crises have also led to an alarming rise in extreme poverty, forced and unsafe migration, and an increase in gender-based violence reports. These factors collectively amplify the risk of all forms of modern slavery.

Within the Act, modern slavery is defined to encompass eight severe forms of exploitation, which are as follows:

- Trafficking in persons
- Slavery
- Servitude
- Forced marriage
- Forced labour
- Debt Bondage
- Child labour
- Deceptive recruiting for labour or services.

These forms of exploitation are deemed serious violations of human rights and are comprehensively addressed within the Act to combat modern slavery.

Ausenco is committed to fulfilling our obligations under the *Modern Slavery Act 2018* (Cth) and acknowledge the significance of safeguarding human rights. At Ausenco, we prioritise the protection of the rights of all individuals, including our employees, clients, and those within our supply chains. To address the various forms of modern slavery, we have implemented risk mitigation measures. These measures aim to identify and address any instances of modern slavery within our operations and supply chains, ensuring that human rights are upheld and respected. We are dedicated to creating an environment free from modern slavery and are actively working towards this goal.

1.1 Reporting Entity

This is Ausenco's fourth year of reporting under the Act. This joint statement is made in respect of Ausenco Pty Ltd (ACN 114 541 114), and its related bodies corporate set out in Appendix 1, for the financial year 30 June 2022 to 30 June 2023. This statement was approved by the Board of Directors and the Ausenco Audit and Risk Management Committee (ARMC) in their capacity as the principal governing body of Ausenco Pty Ltd on 30 June 2023.

1.2 Stakeholder Consultation

During the reporting period covered by this Statement covers, Ausenco engaged and consulted with its related bodies corporate outlined in Appendix 1 and internal stakeholders. The actions outlined in this Statement were implemented in consultation with Ausenco's legal teams, global projects group, procurement, and vendor authorisation teams.

Ausenco will be undertaking global business ethics training later this year where Ausenco will describe its annual reporting requirements under the Act and provided personnel with relevant materials and updates.

2. Our business structure and operations

Ausenco is a global engineering consulting company, with its headquarters located in Brisbane, Australia. We are a global company redefining what's possible. Our team is based across 26 offices in 15 countries, with projects in over 80 locations worldwide. Combining our deep technical expertise with a 30-year track record, we deliver innovative, value-add consulting studies, project delivery, asset operations and maintenance solutions to the mining & metals, oil & gas and industrial sectors. We find a better way.

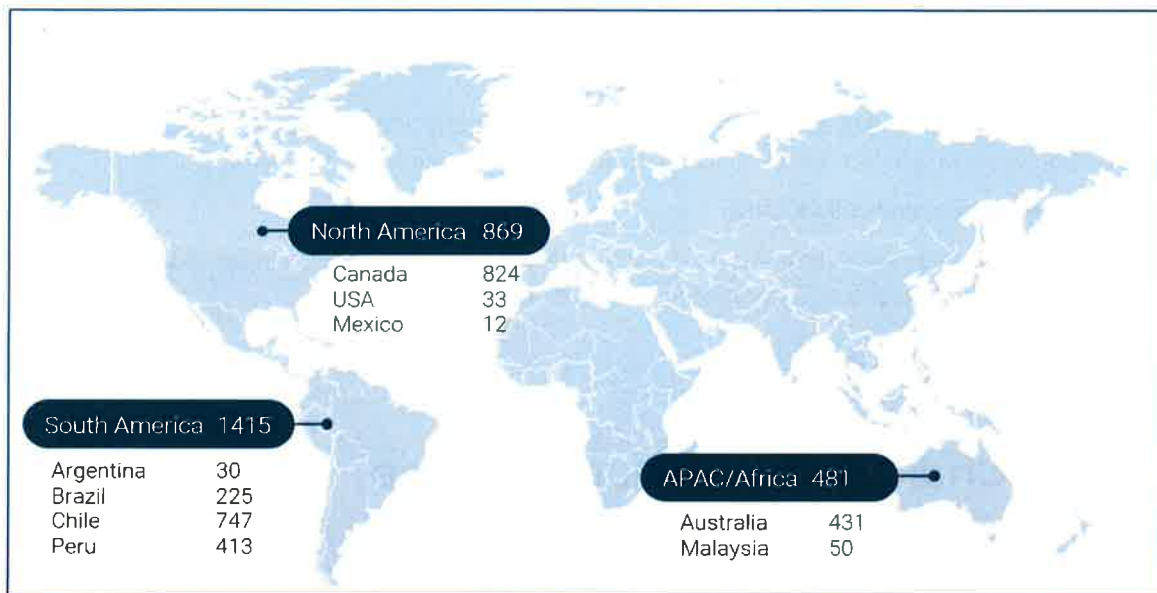


Figure 1.1 People numbers

Throughout our growth, our commitment to innovation continues. We are dedicated to finding ingenious solutions that create value for our clients - on every project. We are always looking to deliver practical solutions to complex problems – and sometimes that means pushing the boundaries of what has been done before.

We are also committed to having a positive impact on the world around us. Wherever we work, we strive to collaborate with clients and communities to achieve truly sustainable outcomes in health, safety, the environment, and community.

2.1 Our Values

Our core values are the cornerstone of everything we do. They enable us to discover through ingenuity and lead by example.

Safety in all we do

Regardless of where our people work across the globe, they deserve to be safe and feel safe. We let nothing compromise our safety performance and have safety initiatives in place to achieve our target of Zero Harm.

The client is our focus

We develop trusting and open relationships with our business partners and clients, ensuring we meet their needs and exceed their expectations. By delivering extraordinary results, we build their business and our own.

Our people are our strength

We value our people's ability, diversity, and creativity, and do all in our power to nurture their existing talents and develop new ones. The way we care for, grow and encourage our people is a key part of our culture, and is governed by our People Practices.



Respect the community and environment

Wherever we operate, we respect the diverse communities and environments and strive to achieve sustainable outcomes for all. Our footprint must engender a positive outlook for future generations, both abroad and at home.

We seek ingenious solutions

We encourage our people to continually expand their knowledge and experience to become life-long learners. By constantly striving to find the best solution, we foster innovation.

We are open, honest and collaborative

We respect the diversity and differences of our people, clients and the communities in which we live and work. We are straightforward and collaborative in all our communication.

3. Our Approach

3.1 Supply Chain Risks and Due Diligence

As part of Ausenco's approach to supplier management, we have incorporated a Modern Slavery Questionnaire into our onboarding process for new vendors. This questionnaire serves as a crucial tool in assessing supply chain practices and identifying any potential risks related to modern slavery. Throughout our reporting period, we collected responses from new vendors, which provided us with valuable insights. The following are the key findings revealed by their responses:

- **Geographical Distribution:** Among the new vendors onboarded, 23% were located outside of Australia. These vendors mainly consisted of professional service providers.
- **Supply Chain Visibility:** When asked about the visibility of their supply chain, 35% of the respondents indicated having 'high visibility', indicating a comprehensive mapping of the entire supply chain, including key suppliers at all levels.
12% reported having 'moderate visibility', indicating mapping of major Tier One suppliers. Meanwhile, 32% reported having 'developing visibility', which means they had identified major Tier One suppliers but had limited visibility beyond that level.
- **Service Composition:** Approximately 61% of the new vendors offered professional consulting services, specialising in areas such as recruitment, talent development, engineering consulting, and legal services. These services were considered to pose a lower risk in relation to modern slavery.
- **Risk Mitigation Efforts:** Out of the new vendors, 29% provided training to their employees regarding modern slavery risks and had developed modern slavery policies or statements, indicating their commitment to addressing and mitigating these risks.

- **Remediation:** A significant portion of the vendors indicated that their approach to addressing an allegation of modern slavery would involve conducting thorough investigations, implementing appropriate remediation measures, and potentially considering suspension or termination of contracts.

These findings provide valuable insights into the composition, visibility, and risk mitigation efforts of our new vendors during the reporting period. We will utilise this information to further strengthen our supplier management processes and ensure that responsible practices are upheld throughout our supply chains. Ausenco is expecting a greater number of new vendors to be assessed in the next reporting period once the implementation of the supplier risk evaluation is completed in its international operations.

We acknowledge that specific industries, products, and geographic locations have been associated with a higher prevalence of modern slavery risks. Industries such as cleaning, certain manufacturing sectors, textile production, and agriculture have been identified as higher-risk areas. It is important to note that our primary service offering is engineering consulting services, which falls within the lower-risk category in relation to modern slavery.

However, during our assessment, we identified certain industries that present higher risks. These industries include the provision of computer goods, food and beverage, commercial cleaning services, and corporate clothing. Among these industries, vendors offering commercial cleaning services demonstrated the highest compliance in completing the Modern Slavery Questionnaire. They demonstrated their commitment to addressing modern slavery risks by providing employee training, maintaining modern slavery policies, and conducting due diligence within their supply chains.

By recognising the varying risks associated with different industries and product categories, we can prioritise our efforts to address modern slavery and focus on engaging with vendors in higher-risk sectors.

3.2 Remediation

Workplace Relations

As a company operating in multiple countries, Ausenco has a diverse workforce, and we highly value this diversity. We recognise that this diversity brings organisational strength and opportunities for innovation. Therefore, we are deeply committed to fostering a working environment that is free from discrimination, where individuals can collaborate in a productive and professional manner.

Ensuring a discrimination-free workplace is the responsibility of all our personnel, including employees, contractors, and consultants. We consider any form of discrimination as a serious matter and will neither condone nor tolerate it within our organisation.

To address any concerns related to labor practices or workplace grievances, we have established remediation processes throughout our operations. Our personnel have the right to raise such concerns with their line manager, the People & Performance team, the Ausenco management teams or through Ausenco's Whistleblower Alertline.

We have clearly defined processes for escalating issues, which are outlined in our employment procedures and policies. These procedures and policies are shared with all new employees and are readily accessible through our internal document management system.

By having these robust processes in place, we aim to ensure that any concerns or grievances are promptly and effectively addressed, maintaining a fair and respectful working environment for all.

Dispute Resolution

Ausenco's standard contracts contain provisions for dispute resolution, providing suppliers with the opportunity to raise concerns and escalate issues to our personnel and management. These contracts also stipulate that suppliers must adhere to our Modern Slavery Policy and all applicable laws. Failure to comply with the Policy can result in the termination of the agreement.

Ausenco's Whistleblower Protection Policy and Alertline

Ausenco's Whistleblower Protection Policy is readily available on our website and internal document management system, accessible to all personnel within our organisation and subcontractors and consultants. As mentioned in our previous statement, we have plans to conduct business ethics awareness training later this year. This training is conducted annually and will encompass comprehensive instruction on the Whistleblower Protection Policy and the utilisation of the "Alertline." To facilitate anonymous reporting of issues, the Whistleblower "Alertline," is accessible to all personnel globally. This confidential reporting channel serves as a means for individuals to report any infringements of our policies, including any potential modern slavery risks present in our business operations.

The primary objectives of Ausenco's Whistleblower Protection Policy are as follows:

- Encourage the prevention of wrongdoing and the promotion of ethical behavior within our organisation.
- Outline the legal protections available under Australia's statutory whistleblower protection regime for individuals who report actual or suspected wrongdoing.
- Establish clear guidelines on how we handle and investigate disclosures made by whistleblowers regarding actual or suspected wrongdoing.

We fully support and encourage individuals who come forward to report any violations, and to date, there have been no reported instances of modern slavery through the Alertline or to management.

We remain committed to maintaining a transparent and accountable environment where individuals feel empowered to raise concerns without fear of retaliation.

3.2.1 Employee Awareness

We prioritise the education of our employees regarding modern slavery and its potential presence in a company's supply chain. Later this year, we will conduct a comprehensive global ethics training program, which includes modern slavery awareness, for all our personnel.

This training will be delivered both in person and virtually, ensuring widespread participation. Last year's training program reached a significant number of individuals, with personnel attending from our Australian, Malaysian, South American, and North American offices. Additionally, our Modern Slavery Policy, Statements, and vendor due diligence documents are easily accessible to all our personnel through our website and internal document management system.

By providing such training initiatives and making essential resources readily available, we aim to equip our employees with the knowledge and understanding necessary to identify and address modern slavery risks within our operations and supply chains.

4. The road ahead

Ausenco is fully committed to continuously enhancing our approach to identifying and managing modern slavery risks within our operations and supply chains. To strengthen our response, we have outlined the following actions that we will be implementing:

Looking forward, Ausenco will be implementing the following actions to strengthen our response:

- Progressing the establishment of the global Modern Slavery committee incorporating key internal stakeholders.
- Aligning procurement and vendor registration processes across different regions and business lines.
- Conducting supply chain risk reviews using Modern Slavery Questionnaires in multiple jurisdictions.
- Reviewing existing policies, processes, and documentation to identify areas for improvement.

- Continuation of supplier risk assessment and due diligence activities: We will persist in conducting thorough assessments of our suppliers' risks and implementing due diligence measures. These activities aim to enhance our understanding of modern slavery risks within our supply chains.
- Ongoing employee awareness training including updating of Ausenco's e-learning modules and annual business ethics training.
- Continuous collaboration with Ausenco's global projects group to implement strategies to evaluate modern slavery risks in execution work throughout the world.

Ausenco remains dedicated to upholding ethical standards and making continuous improvements in our efforts to combat modern slavery.

Appendix 1

Ausenco Entity	Location
Vector Argentine SA	Argentina
Ausenco Management Pty Ltd	Australia
Ausenco Operations Pty Ltd	Australia
Ausenco Services Pty Ltd	Australia
Ausenco Rylson Pty Ltd	Australia
Ausenco Projects Australia Pty Ltd	Australia
Ausenco Rylson Asset Optimisation Pty Ltd	Australia
Ausenco International Pty Ltd	Australia (Mexico branch)
Ausenco do Brasil Engenharia Ltda.	Brazil
Ausenco Engineering Canada Inc.	Canada
Sustainability	Canada
Ausenco Chile Limitada	Chile
Ausenco Peru S.A.C	Peru
Ausenco Engineering USA South Inc	USA
Ausenco PSI LLC	USA

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of Ausenco Pty Ltd as defined by the *Modern Slavery Act 2018 (Cth)*¹ ("the Act") on 30 June 2023.

Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of Ausenco's Audit and Risk Committee as defined by the Act²:



Rod Baxter
Non-executive Director and Chair of the Ausenco Audit and Risk Committee

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.	10
b) Describe the reporting entity's structure, operations and supply chains.	3
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.	6
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.	6
e) Describe how the reporting entity assesses the effectiveness of these actions.	6
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).	3
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	

* 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.

- 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.
- 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.



Finding a better way,
every day.

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