

**Brunel**

**Modern Slavery  
Statement**



**2023**

# Introduction

Brunel Australia Holdings Pty Limited (ACN 078 544 126) is registered at office Level 8, 40 The Esplanade, Perth, WA 6000 along with its associated Australian subsidiaries including:

- Brunel Energy Pty Ltd
- SES Labour Solutions Pty Ltd t/a Brunel Mining
- SESLS Industrial Pty Ltd
- Brunel Construction and Maintenance Services Pty Ltd
- Brunel Technical Services Pty Ltd

This statement covers Brunel Australia Holdings Pty Ltd and all its Australian subsidiary entities (Brunel) as listed above. Brunel's policies and procedures cover all the Australian entities listed under this statement, and the endorsement from the Directors covers all the above entities without need for further ratification.

Brunel are 100% owned by Brunel Energy Holdings B.V. (Netherlands) which is 100% owned by Brunel International N.V. (Netherlands), which is listed on the Amsterdam Euronext exchange. We are an international recruitment and staffing business established in 1975 in the Netherlands. Since our first placement of an engineer, we have grown our presence to more than 45 countries around the world. We predominantly service the Renewable Energy, Conventional Energy, Life Sciences, Mining, Infrastructure and Automotive sectors.

During the reporting period, Brunel celebrated 25 years of operation in Australia, where we currently hold physical offices in Perth and Brisbane. Over the past 25 years, we have placed tens of thousands of individuals into work across Australia. We have achieved this by combining our local knowledge and expertise with the strength, infrastructure and reach of Brunel's international network to deliver outstanding results for our clients and the individuals who choose Brunel to find work or their next career move.



# Our core values underpin everything we do at Brunel

*Locally we have implemented our own humanocracy charter that further develops on our passion for people - creating an organisation that is amazing as its people. With our core values in mind, we fully endorse the introduction of the Australian Modern Slavery Act 2018 (Cth). We are against all forms of slavery across our business and will strive to ensure any risk of it occurring within supply chain is eliminated.*



**Tania Sinibaldi**  
Managing Director, Australasia

## Our commitment

This statement addresses Brunel's obligations and compliance in relation to the 'Modern Slavery Act 2018 (Cth)' ('the Act') for financial year ending the 31st of December 2022. It highlights the continued steps we have taken and continue to take in order to ensure there is no form of modern slavery occurring within our organisation or our supply chains. In everything we do, we follow our firmly rooted company values: entrepreneurship, integrity, results-driven and passion for people. It is essential for Brunel to exemplify these values to not only maintain our strong reputation in our industry, but also to protect our company's long-term growth and success.

At the international group level, Brunel fully endorses all fundamental human rights as identified by the International Labour Organisation (ILO) and elaborated in the ILO conventions. Human rights are an integral part of Brunel's culture. Rather than managing human rights as a stand-alone issue, Brunel actively incorporates them into various Brunel policies, such as the Code of Conduct, Harassment, Discrimination & Bullying Policy, HSE Policy, Fitness for Work Policy, Privacy Policy, and Modern Slavery Policy. These policies are readily accessible on our intranet and in our employee handbook. Brunel acknowledges that it is required to submit its Modern Slavery Statement within 6 months from the end of each reporting period.

## Our framework

Brunel have a suite of policies and procedures in place which assist us in managing human rights and decreasing the risk of modern slavery occurring within our business or supply chain:

- **'Code of Conduct'** detailing equal opportunity, our commitment to diversity and our intolerance to modern slavery, discrimination, harassment, and bullying.
- **'Indigenous Participation & Employment Policy'** stating our commitment to identifying opportunities for the participation and employment of indigenous people and businesses.
- **'Anti-bribery'** and **'Whistleblowing'** global policies including annual refresher training on how to identify bribery, corruption, and illegal activities in our business and/or supply chain and how to raise any concerns via our whistleblowing 'SpeakUp' line.
- **Modern Slavery Policy** which states our commitment to eliminating all forms of slavery in our business and supply chain.
- **Supplier Code of Conduct** outlining our expectations and standards that we expect of our suppliers.

## Labour hire licenses

During the 31st of December 2022 reporting period, Brunel was required to hold labour hire licences in the state jurisdictions of Queensland and Victoria.

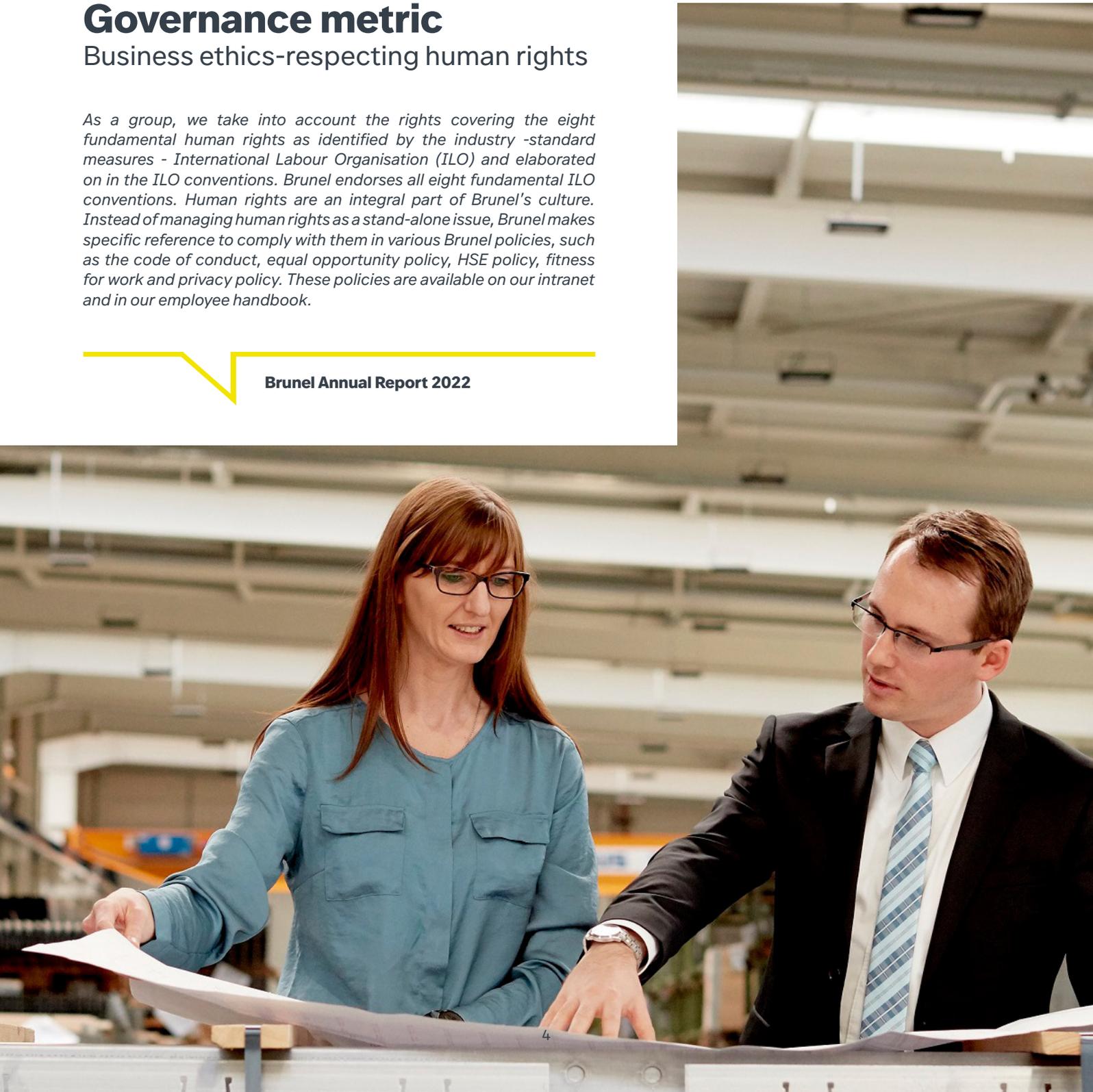
The objectives of Australia's state-based labour hire licensing schemes are, broadly, to protect workers from exploitation by labour hire providers and their host clients to improve transparency, integrity and promote responsible practices within the wider labour hire industry. Licence holders are required to meet strict fit & proper personnel and compliance tests as well as regular reporting requirements.

## Governance metric

### Business ethics-respecting human rights

*As a group, we take into account the rights covering the eight fundamental human rights as identified by the industry -standard measures - International Labour Organisation (ILO) and elaborated on in the ILO conventions. Brunel endorses all eight fundamental ILO conventions. Human rights are an integral part of Brunel's culture. Instead of managing human rights as a stand-alone issue, Brunel makes specific reference to comply with them in various Brunel policies, such as the code of conduct, equal opportunity policy, HSE policy, fitness for work and privacy policy. These policies are available on our intranet and in our employee handbook.*

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## RCSA corporate membership

Brunel is a corporate member of the Recruitment, Consulting & Staffing Association (RCSA) and is bound by the RCSA Code for Professional Conduct, which was authorised by the Australian Competition and Consumer Commission in 2019. Under the Code, Members are accountable to RCSA for meeting the Code's standards of professional conduct.

Specifically, the Code requires Members to adopt values of personal professionalism and operational integrity which, amongst other things, requires Members to:

- i. protect work seekers from exploitation (including all forms of modern slavery);
- ii. conduct business in a way that avoids causing or contributing to exploitation through their business activities;
- iii. seek to prevent or mitigate risks of exploitation that are linked to their operations or services by their business relationships, even if they have not contributed to those risks.

Exploitation is defined in the Code in the following way:

Exploitation, of one person (the victim) by another person, occurs if the other person's conduct causes the victim to enter into any of the following conditions:

- i. slavery, or a condition similar to slavery;
- ii. servitude;
- iii. forced labour;
- iv. forced marriage;
- v. debt bondage.

It also includes serious breaches of the Fair Work Act 2009 (Cth), the Employment Relations Act 2000 (NZ) and unconscionable conduct within the meaning of the common law or the Australian Consumer Law.

As an RCSA Member we are required to meet and are responsible for ensuring that our staff meet the standard of professional conduct required by the RCSA Code.

# Identified risks of modern slavery

We recognise that modern slavery has the potential to exist in our operations and supply chain. Our staff for the entities covered under this statement are based in Australia which has a low prevalence of modern slavery (Global Slavery Index 2018) and a strong regulatory environment. Our business employs over 120 direct staff within our operations and an additional 1,000 contract hire workers (at any one time) across white-collar and blue-collar roles in the Mining, Engineering, Infrastructure, Life Sciences and the Energy sectors.

At the outset of the first reporting period, we identified several areas we believed were the most at risk of modern slavery occurring within our business and supply chain. In the previous reporting period, we expanded this list to capture additional industries and suppliers. Our current list of high-risk suppliers which we have identified include: -

1. Personnel Protective Equipment (PPE) and garments vendors
2. Cleaning services companies
3. Recruitment, Staffing and Labour Hire Supply companies
4. IT Services companies
5. Travel management company

1. Under some of our client contracts, Brunel are required to supply our workers with PPE. We utilise third party suppliers to supply this PPE. Brunel also purchases merchandise (t-shirts, mugs, branded stationary) as part of our marketing materials. We also utilise third party suppliers to supply this merchandise. Such clothing and garments are often produced in developing countries with a higher risk profile of modern slavery, especially in textile industries. Without the appropriate controls in place, Brunel could be directly linked to modern slavery practices through the services we receive from our third-party suppliers.

2. We utilise cleaning contractors in the two offices that we lease in Perth and Brisbane. We recognise that due to the nature of the manual, low-skilled and at often times low-paid work across the commercial cleaning industry, there is a higher risk that modern slavery could be occurring in the businesses or the supply chain of the cleaning companies we have contractual agreements in place with.

3. Brunel directly introduce candidates to our clients. Those candidates who are selected by our clients are then contracted and paid directly through Brunel in accordance with the minimum standards set out in the Fair Work Act's National Employment Standards, Modern Awards, or relevant Enterprise Agreements under which the work assignment falls. Brunel do not currently provide staffing solutions to any of the industries identified as high-risk sectors listed in the 'Migrant Workers' Taskforce' report handed down in March 2019. At present, our corporate strategy outlines that we will continue to not provide our services to these high-risk sectors. From time to time, where we are unable to source skills from within Australia, Brunel may partner with recruitment firms in countries we do not hold operations or entities within the global group to payroll our workforce placed on assignment in that location.

4. Brunel utilise numerous digital tools and software solutions to deliver our services. We implemented a new invoice approval system digitizing our previous paper-based process. Such solutions purchased from suppliers have their own support functions and teams. The IT Solution industry has been known to offshore or outsource work and support to 'delivery centres'. Some of these delivery centres could be located in countries that have a higher risk of modern slavery occurring.

5. Over the reporting period we witnessed our travel spend return to pre-COVID levels with both our internal staff travelling to visit overseas counterparties and our clients requiring interstate and overseas travel for delivery on their projects. Brunel partners with a travel management company to help deliver these logistical requirements. There is a risk in the travel industry that some of the more administrative burdensome tasks could be offshored to locations that do not have the same employment standards as Australia and therefore open up the avenue for modern slavery to exist in our supply chain.



## Actions taken to managing modern slavery risks

Since the creation of the Modern Slavery Act 2018 (Cth) Brunel have developed various due diligence systems to help us identify, mitigate, and prevent modern slavery occurring in our business or supply chain. Actions we have put in place and continue to deploy include:

Development of a supplier questionnaire to help identify areas of Brunel's supply chain more prone to the risk of modern slavery occurring.

Issuing the supplier questionnaire to our suppliers identified as high risk– i.e. PPE supplier & cleaning services, recruitment partners, IT Services companies and Travel partner(s).

Development of a matrix (gap analysis) of where modern slavery risks have been identified in our supply chain, for instance where a supplier does not have a modern slavery policy or statement, and in such situations track where there is increased potential for modern slavery occurring and/or a case of modern slavery has been identified.

Communicating the issue of modern slavery to our staff utilising our RCSA membership and its associated resources, including a webinar 'Modern Slavery & Vulnerable Worker Protections' made available within our BeSmart training portal. On top of this, we continually seek employee feedback on the effectiveness of Brunel's actions and framework to combating Modern Slavery.

Compulsory Modern Slavery Training that all staff must complete on an annual basis. This training helps increase their knowledge of Modern Slavery and staff's ability to identify its potential risk areas.

Creation of a supplier code of conduct which is issued to all current and proposed suppliers, mandating they operate in accordance with the Modern Slavery Act 2018 (Cth), where required, and reject all forms of modern slavery.

Implement biannual reviews amongst Brunel's senior management team to identify any gaps in our Modern Slavery strategy and agree on any required actions.



## Assessment of actions

Over each reporting period to date we have reviewed the actions and processes we have put in place to combat modern slavery. Over the current reporting period, we have focussed on assessing our actions in the following areas:

- Brunel's Procurement and Supply Chain, including our supplier assessment questionnaire and Brunel's standard terms of business.
- Our governance and due diligence framework, including our Modern Slavery Policy
- Review of our internal training methodology.

For suppliers we deem as high risk, we make it a mandatory requirement to complete our modern slavery assessment questionnaire in order to supply to Brunel. We have taken a hard-line on this requirement and are prepared to terminate contracts with suppliers that do not comply with this request. To date, we have not had to terminate a supplier contract due to a breach of this KPI, and as a result we are satisfied with how the strategy is currently working. The responses have also identified a low risk of modern slavery occurring within our supply chains.

Part of our focus over the last period was to assess all our company policies and procedures as part of a larger quality and HSE audit schedule. Under this review, we identified that our Modern Slavery policy required updating to align to the processes and actions we have developed since the inception of the Modern Slavery Act (Cth) 2018. The updated policy will be published in time for the next reporting period and will continue to be assessed for its effectiveness under our Quality Audit Schedule and annual ISO re-certification.

Over the last reporting period we also updated Brunel's standard terms of business, which govern the services we deliver to clients in absence of any client terms of business, whereby we establish greater obligations on our clients. These obligations include the requirement that clients provide all assistance, information, documentation, and reasonable access as necessary to enable Brunel to meet its obligations under the terms of the service agreement and at law. Such reference to law includes laws associated with Modern Slavery. A requested removal of this clause, by prospective clients, is a non-negotiable item for Brunel and would prevent us from engaging further with the request. Over the reporting period, no prospect clients requested this clause to be removed.

One of our main focusses last year was to work with our solutions provider to develop and maintain training materials for our own staff around the risks of modern slavery. This reporting year, in collaboration with our external provider, we refreshed our training course to capture updated statistics, new developments across legislation, as well as information on 'what are our responsibilities and an additional topic on when the Modern Slavery Act is due for review. We make it a mandatory requirement that staff complete the modern slavery training annually. Our assessment of this has shown that to date, 100% of active staff in our organisation have completed the required annual training.

## Senior management annual review

During the reporting period, Brunel's senior leadership team met to discuss our current initiatives to address the risks of modern slavery occurring in our business and supply chain. Along with this, the team collaborated on items that we wanted to focus on for the next reporting period based on what we had learnt to date. The results of our meeting and assessment of our structures and strategies to date are captured in our 'Assessment of actions' and 'Looking forward'. It was concluded at the most recent meeting that the management review of the Modern Slavery strategy should be conducted in line with our Audit Schedule on a biannual basis rather than the initial annual meeting.



## Forced labour (including bonded labour)

*Within the company, applicable labour standards must be observed. Brunel and its business partners will not, under any circumstances, make use of forced labour, child labour, modern slavery, or any labour in violation of the ILO conventions. Brunel has addressed this topic in its code of conduct. Brunel is determined to keep developing its approach towards preventing forced labour.*

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## Looking forward

Over the next reporting period, Brunel will continue to assess ways to reduce the risks of modern slavery. The key initiatives we are committed to include:

- Publish and updated Modern Slavery policy that forms part of our larger group policy updates
- Continue to undertake and assess the ongoing assessment of our supply chain through our supplier questionnaire
- Continue to consult with our industry peers on best practice in helping eliminate modern slavery via our RCSA corporate membership
- Continue to train our people through our annual refresher training in our new system, which will be able to track test results in real time and send automatic reminders to complete annual refreshers.

This Modern Slavery Statement has been approved by the Brunel Australia Holdings Pty Ltd (and associated Australian entities) board of directors on 15 June 2023.

**Tania Sinibaldi**  
Managing Director, Australasia  
Brunel

**Brunel Australia Holdings Pty Ltd**

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