

## Modern Slavery Statement – April 2022 to March 2023

### Introduction

This Modern Slavery Statement is made on behalf of Sterling & Wilson (the "Company") in accordance with the Modern Slavery Act 2018. It sets out the steps taken by the Company during the financial year ending March 2023 to prevent modern slavery and human trafficking in our operations and supply chains.

### Company Overview

Sterling & Wilson is a global engineering, procurement, and construction (EPC) company committed to providing sustainable solutions in the energy and infrastructure sectors. We operate in multiple countries and have a diverse workforce, engaging with various suppliers and stakeholders across our operations.

### Our Commitment

At Sterling & Wilson, we are dedicated to upholding the highest ethical standards and ensuring that modern slavery and human trafficking have no place in our business or supply chains. We are committed to promoting human rights, fair labour practices, and the well-being of all individuals associated with our operations.

### Policies and Procedures

We have implemented robust policies and procedures to address modern slavery and human trafficking risks, including:

1. **Code of Conduct:** Our Code of Conduct establishes clear expectations for all employees, contractors, and suppliers, emphasizing compliance with applicable laws and respect for human rights.
2. **Supplier Due Diligence:** We have implemented a comprehensive supplier due diligence process to evaluate the risk of modern slavery within our supply chains. This includes assessing suppliers' policies, practices, and commitment to human rights.
3. **Employee Training:** We provide training to our employees to raise awareness about modern slavery and human trafficking, ensuring they understand their role in identifying and preventing such risks.
4. **Whistleblowing Mechanism:** We have established a confidential reporting mechanism that allows employees and external stakeholders to report concerns related to modern slavery, ensuring appropriate action is taken to address such issues.

### Supply Chain Management

We recognize the importance of working closely with our suppliers to mitigate the risk of modern slavery. Our supply chain management practices include:

1. **Supplier Evaluation:** We evaluate potential suppliers based on their adherence to our ethical standards, including their commitment to human rights, fair labour practices, and prohibition of modern slavery.
2. **Supplier Audits:** We conduct regular audits of our suppliers to assess their compliance with our requirements. These audits include specific checks for modern slavery risks.
3. **Supplier Contracts:** Our supplier contracts contain provisions that require suppliers to comply with all relevant laws, regulations, and international standards, including those related to modern slavery and human trafficking.
4. **Continuous Improvement:** We collaborate with our suppliers to encourage continuous improvement in ethical practices and to address any identified areas of concern.

#### Future Steps

We remain committed to continuously improving our approach to combatting modern slavery and human trafficking. In the coming year, we will:

1. Further enhance our training programs to ensure that all employees are knowledgeable about modern slavery risks and prevention strategies.
2. Strengthen our supplier due diligence process by expanding risk assessments and collaborating closely with high-risk suppliers to address any identified issues.
3. Engage with industry partners, civil society organizations, and other stakeholders to share best practices and contribute to wider efforts in eradicating modern slavery.
4. Regularly review and update our policies, procedures, and risk assessments to ensure their effectiveness in preventing modern slavery throughout our operations.

#### Conclusion

Sterling & Wilson is fully committed to preventing modern slavery and human trafficking. We will continue to uphold our ethical responsibilities, monitor our operations and supply chains, and take appropriate action to combat these crimes. This Modern Slavery Statement reflects our commitment to transparency and accountability as we work towards a world free from modern slavery.

This statement was approved by the board of Sterling & Wilson in Australia on 10July2023.

Signed,



Phil Sheridan  
CEO