



**ALTUS GROUP**

## Modern Slavery Statement

2022/23 Financial Year  
Altus Group Holdings Pty Ltd

ABN: 76 168 179 691

1.05 L1 3 Thomas Holt Drive  
Macquarie Park NSW 2113

## Introduction

This document is a Modern Slavery Statement issued by Altus Group Holdings Pty Ltd ABN 79 168 179 691 (“Altus”) in accordance with the *Modern Slavery Act 2018* (Cth) (the “MS Act”) with the approval of the Board of the Altus Group. It is anticipated that this Statement is registered with the Minister and available on the Modern Slavery Statements Register.

Altus Group is an Australian Private Company operating throughout Australia and provides a range of temporary traffic management and allied services across multiple industry verticals.

## Background

The introduction of the MS Act in Australia in 2018 highlighted the extent and adverse consequences of modern slavery for many Australian businesses and corporations, including Altus Group Holdings Pty Ltd. Notably, that an estimated 50 million individuals throughout the world were subject to a material deprivation of freedom in the service of supply chains via some combination of exploitation, threats, coercion or deception.

On these numbers, more than 10,000 individuals will need to be freed from the bondage of modern slavery each day if the United Nations target for eradicating the practice by 2030 is to be accomplished. To this end, the Altus Group is supportive of the prescriptions in each of the *UN Guiding Principles on Human Rights* and Australia’s *National Action Plan to Combat Modern Slavery*.

The Altus Group is a people and safety focussed business, intuitively committed to the health, well-being and rights of its workforce, as well as those who form part of the supply chain that allows it to get everyone home safely. We acknowledge that supply chains can be complex, diverse and at times opaque and that without diligence the risk of engaging with organisations who may tolerate modern slavery outcomes, however moderate, is possible.

Consequently, Altus is adopting a risk-based approach to the evaluation of its supply chain, along dimensions of complexity, geography and market. Together with an unambiguous communication of expectations regarding modern slavery practices, we are confident of ensuring that our economic endeavours will not negatively impact this important social goal.

## Structure and Operations

Altus Group Holdings Pty Ltd is the parent company of Altus Traffic Pty Ltd, Traffic Diversions Group Pty Ltd, Traffic Logistics Pty Ltd and Altus Training Pty Ltd t/a CivilEdge.

The traffic management sector of the Group is primarily a serviced-based organisation delivering temporary traffic management services to customers in road, rail and building construction, road and rail maintenance, utilities construction and maintenance, event management, municipal, mining and engineering services. Services encompass the planning, permitting, supply and execution of temporary traffic management diversions, effectively facilitating customers to undertake their core business in public locations safely. Services are delivered through an assembly of resources including people, fleet, technological systems and traffic control devices.

CivilEdge is similarly a service-based organisation delivering training packages to both internal and external customers allied to the temporary traffic management industry. Training is executed in a combination of classroom training and in-field assessment by accredited trainers. CivilEdge holds formal status as a Registered Training Organisation with the Australian Skills Quality Authority.

The Group employs approximately 4,200 people among 23 capital city and regional locations throughout Australia with the majority engaged on a casual basis. An offshore team of 47 people based in Manila, Philippines additionally provides administrative and planning support under a business process outsource arrangement.

## Supply Chains

As a primarily service-based organisation, the risk of Altus being *directly* exposed to modern slavery continues to be assessed as low to moderate. Altus does not engage in the production and sale of goods, nor does it directly source raw materials for input. Greater than 98% of the more than 700 members of the Altus Group supply chain are Australian based businesses where the risks of modern slavery are comparatively low in the context of global markets.

Supply chain categories may be broadly divided among Products and Services as follows:

Products	Services
<ul style="list-style-type: none"> <li>• Vehicle/fleet purchase and hire</li> <li>• Plant purchase and hire</li> <li>• Approved traffic devices purchase</li> <li>• Personal Protective Equipment purchase</li> <li>• Office equipment, furniture and consumables purchase</li> <li>• IT device purchase and hire</li> <li>• Property Leasing</li> </ul>	<ul style="list-style-type: none"> <li>• Fleet Management Services</li> <li>• Labour Hire Services</li> <li>• Facilities maintenance services</li> <li>• Professional services</li> <li>• Telecommunication services</li> <li>• Business process outsourcing</li> <li>• Software subscription and purchasing</li> </ul>

Relationships through the Altus supply chain may be characterised primarily as deep and long-term, with Altus extending continued support to many of its major suppliers across more than a decade. The scope of supply will vary according to specialisation, service level and commercial arrangement to be either national or regional. Notwithstanding a history of long-term, trusted supplier relationships, commercial arrangements governing the supply of goods and services have been relatively informal and contemporaneously transactional in nature.

Altus examined the dynamics of its supply chain when developing its initial Modern Slavery Statement, assigning its supply chain partners to one of three tiers based upon considerations of spend, geographic/market orientation and the characteristics of downstream supply chains. The Supply Chain profile established during this initial mapping exercise has remained largely consistent across reporting periods.

Supply Chain Designation	Criteria	% Suppliers (approx)
Tier 1	<ul style="list-style-type: none"> <li>• \$250K+ spend in reporting period and/or</li> <li>• Operates in a designated modern slavery high risk geography or market and/or</li> <li>• Downstream supply chain inputs known to extend to high-risk geography or market</li> </ul>	3%
Tier 2	<ul style="list-style-type: none"> <li>• \$100K-\$250K spend in reporting period and/or</li> <li>• Operates in a designated modern slavery moderate risk geography or market and/or</li> <li>• Downstream supply chain inputs known to extend to moderate risk geography or market</li> </ul>	16%
Tier 3	<ul style="list-style-type: none"> <li>• Less than \$100K spend in reporting period and/or</li> <li>• Service-based supplier and/or</li> <li>• Operates in a designated modern slavery low risk geography or market</li> </ul>	81%

## Identifying and Assessing Modern Slavery Risks

This is the Altus Group's fourth Modern Slavery Statement and, pursuant to the guidance for reporting entities under the MS Act, Altus has again assessed the potential that its direct operations and its broader supply chain partnerships may be supporting modern slavery. The low likelihood of *direct* links to modern slavery have been re-affirmed during this most recent review and the organisation is continuing to refine its scrutiny of supply chain risks.

## Causing Modern Slavery

An initial review of the sourcing activities of the Altus Group demonstrates a *low risk* of *directly* contributing to modern slavery. Altus does not engage in the production of goods, does not directly source raw input materials, and does not operate at any material scale outside of Australia.

Recruitment and management of staff is governed by processes that are both articulated and formalised under a third-party certified business management system, and which are aligned to relevant industrial relations and immigration legislative frameworks. Staff recruitment and commencement activities ensure compliance with statutorily compelled age and foreign eligibility requirements. New employees are additionally inducted into the Altus system of policies, procedures and employment conditions.

Enterprise Agreements ratified by the Fair Work Commission and that satisfy the Better Off Overall Test (BOOT) against the applicable Modern Award exist in all States of operation and govern the remuneration and conditions of field-based staff. Office based personnel are engaged under compliant Employee Service Agreements. A dedicated Staff Engagement function oversees processing responsibilities for wages, superannuation and other entitlements, as well as facilitating potential payment queries for expedited resolution.

The use of external labour hire services is minimal, remaining a last resort for the temporary fulfillment of peak and unexpected labour demand and is subject to a formal Contractor Management process.

Additionally, a cohort of approximately 47 staff are sourced out of the Philippines to assist with administrative and planning tasks, with Altus maintaining oversight of compliance with local employment and labour laws as well as general working conditions. As part of ongoing professional development in Manila, the team has a dedicated national manager who, in conjunction with the CEO, visits the Manila office at least twice per calendar year. This ensures quality of training, develops rapport, allows for staff recognition and supports cultural exchange.

As outlined in previous Statements, the Altus Group has launched a Whistle-blower program, overseen by an independent third-party, which provides an added layer of reporting capability for both internal and external stakeholders in relation to any form of alleged corporate or human rights breaches.

## **Direct Links and Contribution to Modern Slavery**

Altus Group's previous Modern Slavery Statements have noted that sourcing decisions tend to be underpinned by a combination of quality, price, supply capability and servicing levels. Historically, the potential for downstream suppliers to contribute to modern slavery has not featured prominently in supplier selection. However, for essentially commoditised items such as signage, traffic control devices and personal protective equipment, it is recognised that supply chains have the potential to extend into higher risk jurisdictions.

Altus Groups contractor management reviews and supply chain mapping activities confirms the inconsistent approach to understanding, assessing and monitoring the dimensions of modern slavery and the dynamics of extended supply chains. Specifically –

- Entities who do not meet the commercial threshold for the mandatory annual submission of Modern Slavery Statements tend to have limited knowledge of the dimensions of modern slavery and no related policy, training or procedural framework in place.
- Furthermore, the competitive nature of pricing in sectors such as clothing/uniforms and personal protective equipment dictates decision-making on inputs resulting in a general absence of due diligence in terms of supplier screening and supply chain risk assessments to assess downstream modern slavery risk.
- Entities not required to submit Modern Slavery Statements are less likely to respond to surveys or requests for information designed to improve supply chain visibility for entities required to report on modern slavery risk.

Ongoing dialogue with trading partners suggests that modern slavery risk with *direct* trading partners remains low to moderate. However, the challenges associated with developing a clear oversight of extended supply chains, some of which encroach into higher risk jurisdictions, suggests a residual potential for indirect exposure.

## **Addressing Risks**

To date, Altus Group has focussed both on its internal and external stakeholders in its efforts to bring attention to the size and gravity of modern slavery across the world.

Internally there has been an emphasis on creating awareness and attention as to the dimensions and complexities of modern slavery to encourage broader understanding and to ensure more informed and accountable decision-making, particularly across the management cohort. Additionally, our commitment to issue resolution and equal opportunity has been evidenced by a dedicated Staff Engagement function and, more recently, the formation of an independent Whistle-blower program.

Externally there have been efforts to consolidate modern slavery considerations into our supplier arrangements by way of enhanced supplier engagement processes and encouraging suppliers to develop deeper understandings of their supply chain dynamics and identify the potential for indirect links to modern slavery practices.

Experience suggests these are slow moving initiatives requiring continued attention.

## **Addressing Risks – a changing risk profile**

Since the submission of its last Statement, there has been considerable growth across Altus Group as a result of both merge and acquisition opportunities and organic growth. The workforce has more than doubled and the merge and acquisition process has seen an expansion of the Groups supplier network.

Consequently, much of the focus for the upcoming reporting period will be to build upon the ongoing actions emanating from previous Modern Slavery Statements. Specifically, Altus Group will maintain a focus on its core modern slavery initiatives:

- Internal E-Learn training modules incorporated into the management on-boarding process along with automated annual refresher sessions.
- Re-launch of Altus Groups Whistle-blower framework (“Speak-Up”) to management and field-based personnel with advice and guidance on how to report unethical, unfair, discriminatory or exploitative workplace conditions or behaviours.
- Full onboarding of workers absorbed into Altus Group operations via merge and acquisition including Modern Slavery and Whistle-blower training.
- A review of the supply network of any entities joining the Altus Group via merge and acquisition including the mandatory completion of a Supplier Questionnaire prior to a determination relating to ongoing engagement
- Increased collaboration with supply chain partners who are also reporting on modern slavery to leverage off methods for effective supply chain assessment and supplier engagement.

## **Effectiveness of Actions**

The pace of expansion for the Group across the financial year has challenged its capacity to complete all actions detailed in its last Statement. The table below refreshes actions carried over along with additional agreed initiatives for the coming reporting period.

The key areas of focus are summarised as:

- Increasing awareness for internal stakeholders in relation to the scope and global impacts of modern slavery through engaging training and guidance materials.
- Reviewing and updating the organisations management systems to ensure a fit-for-purpose policy and procedural framework in light of anticipated continued growth and expansion.
- Ongoing focus on the development of compliant industrial relations instruments and the review and roll-out of an overarching Code of Conduct policy.
- Enhanced efforts with key suppliers to obtain deeper supply chain visibility and commitment from trading partners to join us in due diligence assessments.

FY24 ACTIONS	MEASURE
Completion of updated Modern Slavery internal training and awareness module by all management and office-based representatives.	90%
Updated Modern Slavery Supplier Questionnaire – distribute to specified/targeted supplier cohort to determine current state.	70% response rate
“Speak-Up” – distribution of information and guidance material to all personnel as a re-launch of the existing whistle-blower program.	100%
Development of a formal Modern Slavery Policy document – rolled out across the organisation and embedded into internal training materials	100%

## Consultation

Whilst the modern slavery risk for CivilEdge has been assessed as negligible in comparison with Altus Traffic, the development of this Statement included consultation and opportunity for input across both divisions.

Additionally, this Statement has been duly reviewed and approved by the Altus Board.



Ben Marsonet, CEO & Director  
Altus Group