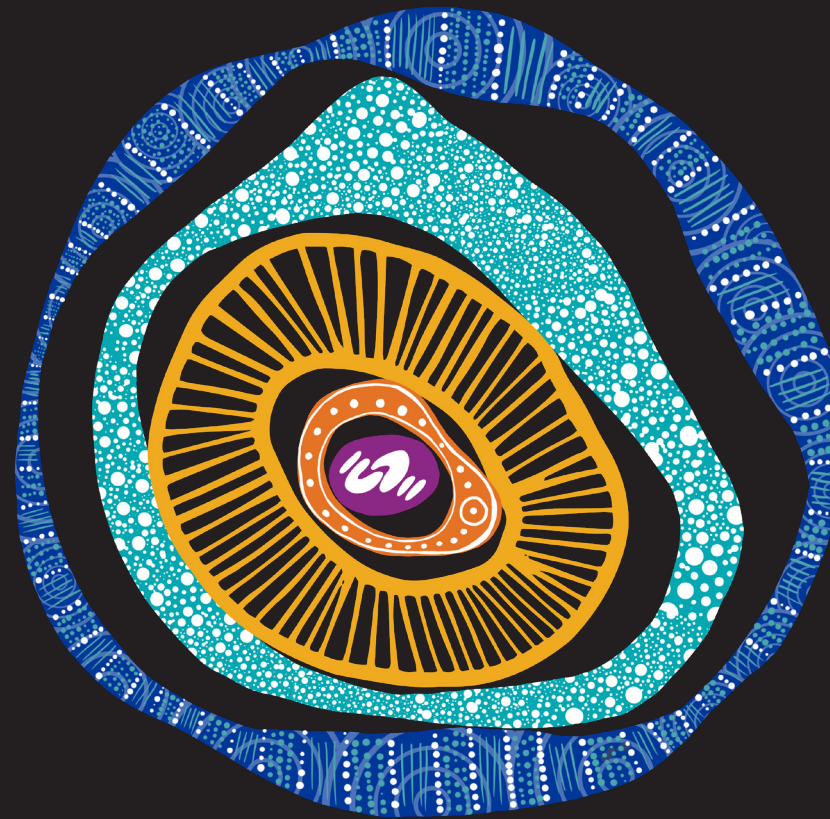




Modern Slavery Statement

Beca acknowledges First Nations peoples of Australia as the Traditional Custodians of the lands, waters and Communities where we live, learn and work.



Canberra Office
Ngunnawal

Adelaide Office
Kurna

Brisbane Office
Turrbal & Yuggera

Melbourne Office
Wurundjeri

Designed by Pat Caruso

Sydney Office
Gadigal

Newcastle Office
Awabakal

01 Introduction

The Beca group of companies (Beca Group) is dedicated to conducting business in a lawful manner and to the highest standards of business ethics. We expect our suppliers to conduct business to the same high standards.

Beca Group opposes all forms of slavery and human trafficking and is committed to ensuring modern slavery or trafficking does not exist in any part of Beca or in our business dealings.

We strive to achieve this by acting ethically and with integrity and transparency, and by acting in accordance with our standards and principles including those outlined in this policy.

This statement constitutes the Beca Pty Ltd ACN 004 974 341 (Beca Australia) modern slavery statement in accordance with the Modern Slavery Act 2018 (Cth) for the financial year ending 31 March 2024.

Structure, operations, and supply chains

Structure

Beca Australia is structured as a company incorporated in Victoria, with approximately 750 permanent employees across offices in Brisbane, Sydney, Canberra, Adelaide, Newcastle and Melbourne. Beca Australia's registered office is at: Level 23, 695 Collins Street, Melbourne VIC 3008.

Beca Australia is part of the Beca Group. Beca Australia's ultimate holding company is Beca Group Limited.

Beca Australia owns/controls the following entities (subsidiaries):

Beca Consultants Pty Ltd, ACN 003 431 089, located at Level 23, 695 Collins Street, Melbourne VIC 3008 (BCPL). BCPL carries out the same type of services as Beca Australia. It has no employees and relies on secondees and sub consultancy services from Beca Australia to provide its services.

Hunter H2O Holdings Pty Limited, ACN 602 201 552, located at 19 Spit Island Close, Mayfield West NSW 2304 (HH2O). Beca Australia acquired the shares of HH2O in April 2022. HH2O carries out the same type of services as Beca Australia.

As a result of the above circumstances, neither BCPL nor HH2O faces modern slavery risks that are not already dealt with by Beca Australia.

Accordingly, for the purposes of this statement, a reference to Beca Australia includes a reference to BCPL and HH2O.

Operations

Beca Australia is an independent advisory, design and engineering consultancy business. Beca Australia primarily provides services in relation to projects in Australia, but occasionally does provide services for projects outside of Australia. Beca has been in existence for over a century in New Zealand and for more than fifty years in Australia, and the group currently has over 4400 employees in more than 20 offices around the world. Aside from our Australian offices, others are in New Zealand, Singapore, Indonesia, New Caledonia, Myanmar, Thailand, The Netherlands, and Fiji. All locations provide professional engineering consultancy and associated services and Beca Australia provides services to other Beca companies in these countries.

The majority of our employees are office-based, with a small number of exceptions where professional support is provided on project or client sites. The core of the company relies on employees who are professional engineers, draftspeople, planners, project managers, hydrologists, and architects. Support teams exist for IT, Administration, Finance, Health, Safety & Environments, Legal, Clients and Markets and People and Culture.

Beca has generally long-term relationships with our software and ICT hardware vendors, with professional service consultants being commissioned on an as-required basis for projects.

Supply chain

As an engineering and professional services consulting firm, Beca considers the risk of modern slavery and human trafficking in its supply chain to be low. This is largely due to the nature of our business and the services that we and others in our supply chain provide.

Services provided by suppliers

Beca Australia's supply chain is primarily comprised of professional consultancy service providers that we collaborate with to assist in our project delivery. In some instances, this service is provided by Beca employees in other countries. Other professional service consultants are commissioned on an as-required basis and are predominantly office-based and located in Australia.

We also directly engage suppliers of services to assist with the ongoing operation and maintenance of our offices including, for example, facility management as well as the provision of services such as legal, immigration consulting and auditing.

Products provided by suppliers

Beca predominately procures ICT hardware and software required to operate a professional consulting business. Most hardware and software is procured from large suppliers head officed out of the USA. Other products are procured mainly from local Australian suppliers.

Products and services used by indirect suppliers

Products from indirect suppliers are predominantly related to office management, such as paper and consumables.

Services from indirect suppliers can be from sub-contractors to our professional consultancy suppliers, as well as for the provision of office services such as security, couriers, cleaning, rubbish removal, provision of plants, catering, transport and utilities. Note some of these are contracted directly in some office locations.

Risks of modern slavery practices

Beca considers the risk of modern slavery and human trafficking in its supply chain to be low. This is largely due to the nature of our business and the services that we and others in our supply chain provide which meet sound internal or industry standards. Many of our product and service suppliers are large organisations which are covered by various Modern Slavery legislation in Australia and throughout the world. We consider the risk of modern slavery and human trafficking to potentially be highest with smaller local suppliers and sub-contractors such as office cleaners and security.

There have been no reported concerns relating to modern slavery and human trafficking via our whistleblowing channels.

Actions to assess and address risks

Overview

Beca is committed to continual improvement and has implemented practices and measures to minimise the risk of modern slavery and human trafficking taking place within our supply chain. These include:

- a) Undertaking our own due diligence of suppliers and subconsultants with which we do business.
- b) Confirming all employees have a written contract of employment that enshrines our employees' rights and entitlements at law.
- c) Developing and implementing policies for safe and respectful work environments which promote health and wellbeing.

- d) Agreeing on contractual terms with our suppliers and subconsultants requiring compliance with applicable laws.
- e) Identifying and working with companies that are known to us and that have standards that are aligned with our own.
- f) Promoting our Ethics policy which demonstrates our commitment to acting ethically and with integrity in all our business dealings. This policy is available to our employees.
- g) We have developed a Legislative Compliance Framework and carry out annual updates of our risks associated with our legislative obligations.

We continually develop systems, controls and training (which includes training for our existing team and new hires) so that our due diligence in respect of those we do business with is embedded in our processes to monitor, and minimise, the risk of modern slavery and human trafficking in our supply chain.

Actions Taken in the Last 12 Months:

A multi-disciplinary modern slavery team for Australia comprising representatives from People and Culture, Risk, Procurement and our inhouse Legal team has continued to meet, and review the risks previously identified and recorded in the Beca Australian Modern Slavery Risk Register. Management representatives from Hunter HH2O are now fully integrated into the team. Further details on this are contained in section 5 below.

Our supplier on-boarding process has continued to be used throughout the Australian and New Zealand businesses, incorporating a supplier questionnaire. Work to collect information from existing suppliers on their level of compliance with Modern Slavery legislation, including the suppliers of cleaning and security, was undertaken. A questionnaire for new suppliers requiring each one to state its level of compliance with Modern Slavery legislation is in place. It is intended that once completely established, in most instances only approved suppliers will be able to be used by Beca Australia.

Our updated online Equal Employment Opportunity (EEO) training modules which now includes Modern Slavery, (outlining what it is, the forms it can take, why its elimination is crucial, and what steps to take if it is found or suspected) has continued to be used across Beca and will be rolled out to the Hunter H2O team. This training is compulsory for all new and existing employees to undertake and includes questions to ensure understanding of Modern Slavery.

The team is meeting while Australian Modern Slavery risk mitigation procedures are still being established. The team will continue to report progress to the Australian Managing Director, including on KPIs set, and any concerns that may arise.

The Beca Group has identified Social Procurement, including Modern Slavery, as a key group-wide enterprise level risk. The risk is managed by the Beca Group Chief Executive Officer, and our Sustainability Oversight Group in accordance with our Enterprise Risk Management processes and has been updated and reported to our Group Enterprise Risk Committee a sub-committee of the Chief Executive Officer. This reporting included the presentation of the key control work plan summarizing the actions required to establish, implement, and monitor the effectiveness of key controls required to mitigate this risk.

This enterprise risk is reported to the various boards of the Beca Group, including Beca Australia, as part of the Enterprise Risk Management process.

The Beca Group Risk and Opportunity Appetite Statement (GRAS) has been issued to our senior leaders. The GRAS communicates the Group's "zero" tolerance for illegal or unethical behaviour and non-compliance with the law, including Modern Slavery legislation. The GRAS will be rolled out to all employees in August 2024.

Effectiveness of actions to assess and address risks

Modern Slavery related risks are recorded in the Australian Modern Slavery Risk Register, in accordance with the requirements of Beca's Group Risk Management Policy and Group Risk Framework, where the risk is clearly defined in terms of the following:

- risk category;
- risk event description, cause(s) and consequence(s);
- risk manager;
- existing controls in place;
- risk likelihood and consequence;
- current risk level score considering the effectiveness of existing controls;
- residual risk score considering the effectiveness of proposed mitigation actions;

The effectiveness of controls required to eliminate or minimize each modern slavery risk are assessed using the scale outlined in the table below:

A work plan is then established to document the actions required to further establish, implement and monitor the effectiveness of existing controls and proposed mitigation actions. The work plan includes the following information:

- control description;
- control owner;
- actions required to establish, implement and monitor the effectiveness of the control;
- action owner;
- target start and completion date for each action;
- method of obtaining assurance control is in place and effective;
- internal auditor details.

The Beca Group Board will review major risks to which the Beca Group is, and is likely to be, exposed to and approve internal auditors and the scope of their audit function.

The Audit and Risk Committee's mandate includes providing oversight of our governance, audit function, legislative compliance and risk management function on behalf of the Board. This mandate includes regular reviews of progress made in relation to closing-out any actions arising from internal audits.

Annually the Beca Group Limited Board reviews the effectiveness of our audit function, including to review the effectiveness of the methods and actions taken by the Beca Australia Board to assess modern slavery risks. The Beca Group Board reviews significant audit and compliance issues including modern slavery risks, and approves action and remediation plans following Audit and Risk Committee recommendations.

Effective	<p>Nothing more to be done except review and monitor the control for implementation and effectiveness.</p> <p>Management considers the control to be well designed for the risk, and addresses the root causes.</p> <p>Management believes the control is effective and reliable at all times.</p>
Generally Sound	<p>Control has been designed correctly and is in place and effective.</p> <p>Some more work needs to be completed to improve its operating effectiveness, or management has doubts about the effectiveness and reliability of the control.</p>
Needs Improvement	<p>Significant control gaps.</p> <p>Either the control does not treat the root causes or does not operate at all effectively.</p>
Under Development	<p>Control has not been established but is being developed.</p>
Not in Place	<p>Control has not been established.</p>



The Australian Modern Slavery Risk Register and Statement is reviewed on an annual basis with subject matter experts within the Australian Modern Slavery team.

The scope of the review includes:

- the effectiveness of Beca Australia’s risk assessments;
- determining if a risk is live or is closed;
- determining if a risk event description, cause(s) and consequences(s) has changed;
- re-assessing Current and Residual Risk Level scores to consider the effectiveness of existing controls and progress made in proposed mitigation actions;
- identifying any emerging risks.

key performance indicators include:

- the amount of education/ training given;
- the number of complaints resolved through a grievance mechanism (yet to be devised);
- number of suppliers who have satisfactorily completed Supplier Questionnaire.

Consultation process

BCPL’s operations and supply chains are dependent on and overlap with Beca Australia. Accordingly, BCPL’s risks have been considered and incorporated into the above statement, and no consultation is required.

HH2O has some overlapping and some independent supply chains with Beca Australia. Relevant HH2O management has been consulted with and it is agreed that HH2O’s risks have been considered and incorporated into the above statement.

Other relevant information

N/A

This statement was approved by the board of Beca Australia on 21 August 2024.

Signature
Name
Position
Date

Andrew Mailer
Managing Director
Beca Australia
26 September, 2024

**make
everyday
better.**