

# MODERN SLAVERY STATEMENT 2020

# CONTENTS

<b>Statement from the Chairman</b>	<b>3</b>
<b>Introduction</b>	<b>4</b>
Reporting Entities	4
About us	4
Defence and Social Infrastructure Sector	4
Infrastructure Services Sector	4
Telecommunications Sector	4
Transport Sector	4
<b>Our Business at a Glance</b>	<b>5</b>
<b>Fast Facts</b>	<b>5</b>
<b>Our Ownership Structure</b>	<b>6</b>
<b>Our Values</b>	<b>6</b>
<b>Overview of Corporate Governance</b>	<b>7</b>
Our Corporate Governance Structure	7
<b>Policy Framework</b>	<b>8</b>
Ventia’s Code of Conduct	8
Employee Training	8
Third party suppliers to Ventia	8
Modern Slavery Policy	8
Whistleblower Protection Policy	9
Other Relevant Policies	9
<b>Our Supply Chain Management</b>	<b>9</b>
<b>Risk Management approach</b>	<b>10</b>
International Validators	10
Geographic Location of Products and Services	10
Identification of product and service risks	11
Outcome	11
Ongoing Risk Mitigation Measures	11
Measurement of Effectiveness	12
<b>Case Studies</b>	<b>13</b>
Facilities Management Case Study	13
Delron Case Study	13
<b>Appendix 1—Reporting Entities</b>	<b>14</b>

# STATEMENT FROM THE CHAIRMAN

**At Ventia we understand that the serious exploitation of people through threats, coercion or deception which undermines or deprives them of their freedom<sup>1</sup> (Modern Slavery) is estimated to affect over 40 million people<sup>2</sup>.**

Ventia does not tolerate any form of modern slavery and is committed to maintaining and improving systems and processes to prevent modern slavery within our diverse businesses and supply chains.

Ventia is committed to operating in accordance with all applicable laws as well as the Universal Declaration of Human Rights.

Ventia welcomes and supports the introduction of the Modern Slavery Act 2018. Ventia also supports the United Nations Sustainable Development Goals, with one of its priority goals being Goal 8: Decent Work and Economic Growth.

Any form of modern slavery is unacceptable; the challenge of eradicating modern slavery is significant, but Ventia is committed to working with its supply chain stakeholders to tackle human rights issues, including modern slavery.

This Modern Slavery Statement for Ventia Services Group Pty Ltd was approved by the Board as the ultimate parent entity of the Ventia Group on 3 June 2021.



**David Moffatt**  
Chairman  
**Ventia**

<sup>1</sup>Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities

<sup>2</sup>Global Slavery Index—2018

# INTRODUCTION

Ventia Services Group Pty Limited ACN 603 253 541 (**Ventia**) is an Australian proprietary limited company with its registered office at Level 8, 80 Pacific Highway, North Sydney NSW 2060.

This Modern Slavery Statement (**Statement**) has been made pursuant to the Modern Slavery Act 2018 (Cth) (**Act**). The Statement sets out the actions Ventia has taken to address modern slavery risks in our operations and supply chains during the year ended 31 December 2020.

Our approach includes a commitment to continuous improvement as we increase our understanding and awareness of modern slavery risks.

## REPORTING ENTITIES

This is a joint Statement which applies to all Ventia reporting entities within the scope of the Act, as identified in Appendix 1 (collectively referred to in this Statement as “**Ventia**”, “**us**” or “**we**” or “**our**”).

## ABOUT US

Ventia is an essential services provider operating in Australia and New Zealand. We work across multiple sectors in partnership with both government and business clients.

We provide the following services:

- Asset Management
- Digital Solutions
- Engineering & Capital Works
- Environmental Services
- Facilities Management
- Network Design & Build
- Operations & Maintenance
- Property & Consulting

The Industries we serve:

- Commercial property
- Defence
- Education
- Energy & Electricity
- Health
- Industrial
- Justice
- Local Government
- Maritime
- Mining & Minerals
- Oil & Gas
- Rail
- Road
- Social Housing
- Telecommunications
- Water

Our business is organised into four sectors (**Sectors**). These Sectors are supported by whole of group functions, including Legal, Finance, People & Capability.

### Defence and Social Infrastructure Sector

This Sector provides a broad range of services across a range of clients (principally government):

- Defence—including defence base support services and maintenance of key Defence assets
- Social Infrastructure—including operations and maintenance and other support solutions for the Justice, Housing, Health, Education portfolios for various States and asset and facilities management for Local Governments.

### Infrastructure Services Sector

This Sector provides owners and operators of critical infrastructure (such as power, water, industrial and resources industries) with operations and maintenance, capital works, environmental services and remediation work.

### Telecommunications Sector

This Sector provides public and private clients with end-to-end telecommunication services spanning design, supply, construction, installation, commissioning, and maintenance of fixed and wireless network infrastructure.

### Transport Sector

This Sector provides government and private owners and operators of road, motorway, tunnel and rail networks with integrated operations and maintenance services, project delivery and technology solutions.

# OUR BUSINESS AT A GLANCE



Focused operations across **Australia** and **New Zealand**



More than **35,000** talented employees and subcontractors



**400+** projects and contracts



More than **50 years** industry experience

We provide long-term operation, maintenance, and management of critical public and private assets and infrastructure across a diverse range of industries. We do this either by ourselves or in a joint venture (incorporated or unincorporated) which are formed to operate project specific contracts.

## FAST FACTS

WE ARE NOW ONE OF THE **LARGEST INFRASTRUCTURE SERVICES BUSINESSES** IN AUSTRALIA AND NEW ZEALAND



**OUR WORKFORCE**  
MORE THAN 35,000  
TALENTED EMPLOYEES  
AND SUBCONTRACTORS



**COMBINED REVENUE**  
OVER \$5BN



PROUD OF OUR PAST



SAFETY AND HEALTH  
ABOVE ALL ELSE



STRONGER, MORE  
CAPABLE AND  
BETTER TOGETHER



SUSTAINABLE IN  
ALL THAT WE DO

### HARNESSING THE POWER OF TECHNOLOGY



AERIAL OPERATIONS



3D MODELLING



MONITORING SYSTEMS



INTERNET OF THINGS



ANALYTICS

### OUR PROUD HERITAGE

100 YEARS

OVER 100 YEARS OF COMBINED INFRASTRUCTURE SERVICES AND EXPERIENCE

BROADSPECTRUM ESTABLISHED AS TRANSFIELD IN

1956

VENTIA HAS OVER

30 YEARS' EXPERIENCE

### UNRIVALLED SERVICE OFFERING IN AUSTRALIA AND NEW ZEALAND

#### LEADING SECTOR POSITIONS:

DEFENCE  
TELECOMMUNICATIONS  
FACILITIES MANAGEMENT  
TRANSPORT  
ENVIRONMENTAL SERVICES  
WATER AND POWER



### ESSENTIAL INFRASTRUCTURE



BRIDGES



TUNNELS



TELECOMMUNICATIONS



HOSPITALS



OIL RIGS



PUBLIC SPACES

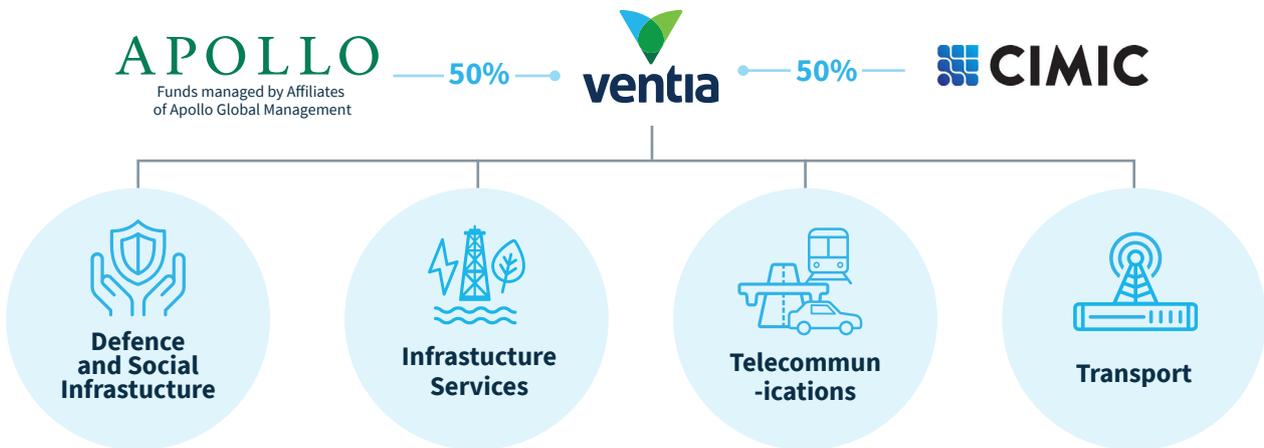


POWER LINES



WATER

# OUR OWNERSHIP STRUCTURE



Ventia is owned under an independent 50/50 investment partnership between an affiliate of the USA based Apollo Global Management and CIMIC Group Limited. It was formed in 2015 through the integration of Visionstream, Leighton Contractors Services and Thies Services. These underlying businesses have an operating history in Australia and New Zealand dating back 25 years.

Effective 1 July 2020, Ventia completed the purchase of the Broadspectrum group of companies in Australia and New Zealand (**Broadspectrum**) from Ferrovial, S.A. The Broadspectrum operations have been fully integrated into Ventia’s operations and are working under Ventia’s compliance framework of policies and standards approved by Ventia’s Board of Directors.

# OUR VALUES

Our purpose, making infrastructure work for our communities, demonstrates that Ventia recognises the decisions we make can significantly affect the lives of those who live in, and depend upon, the communities in which we operate. As such, we put the safety and health of our people, our clients and our communities above all else. It is a fundamental guiding principle for everything we do.

We deliver on our purpose by bringing our values and behaviours to life. Our values guide how we go about our business; the decisions that we make and the actions that we take every day. They ensure we focus on what’s right, and what action we ought to take; even if it’s not always the easiest course of action.



## INTEGRITY: DO WHAT’S RIGHT

- We deliver what we say we will
- We are open, straightforward and honest
- We care for each other’s wellbeing and safety
- We treat everyone fairly and with respect



## COLLABORATION: ACHIEVE MORE TOGETHER

- We work together to bring the best to our clients and communities
- We understand our clients’ needs and add value to their business
- We share resources to get things done
- We listen, respect and respond to different points of view



## CHALLENGE: DRIVE TO DELIVER

- We understand what best looks like and we deliver this to our clients
- We hold each other to account and we manage consequences
- We work with discipline and rigour
- We are energetic and passionate about what we do
- We have the courage to lead change



## INGENUITY: CREATE BETTER WAYS

- We innovate to the benefit of all of our stakeholders (shareholders, clients, communities and employees)
- We bring continuous improvement to our clients
- We seek out and share knowledge and ideas

# OVERVIEW OF CORPORATE GOVERNANCE

At Ventia, we believe good governance is fundamental to achieving our purpose.

The Ventia Board has ultimate responsibility for overseeing Ventia’s response to modern slavery risks. The Board’s Audit, Risk and Compliance Committee

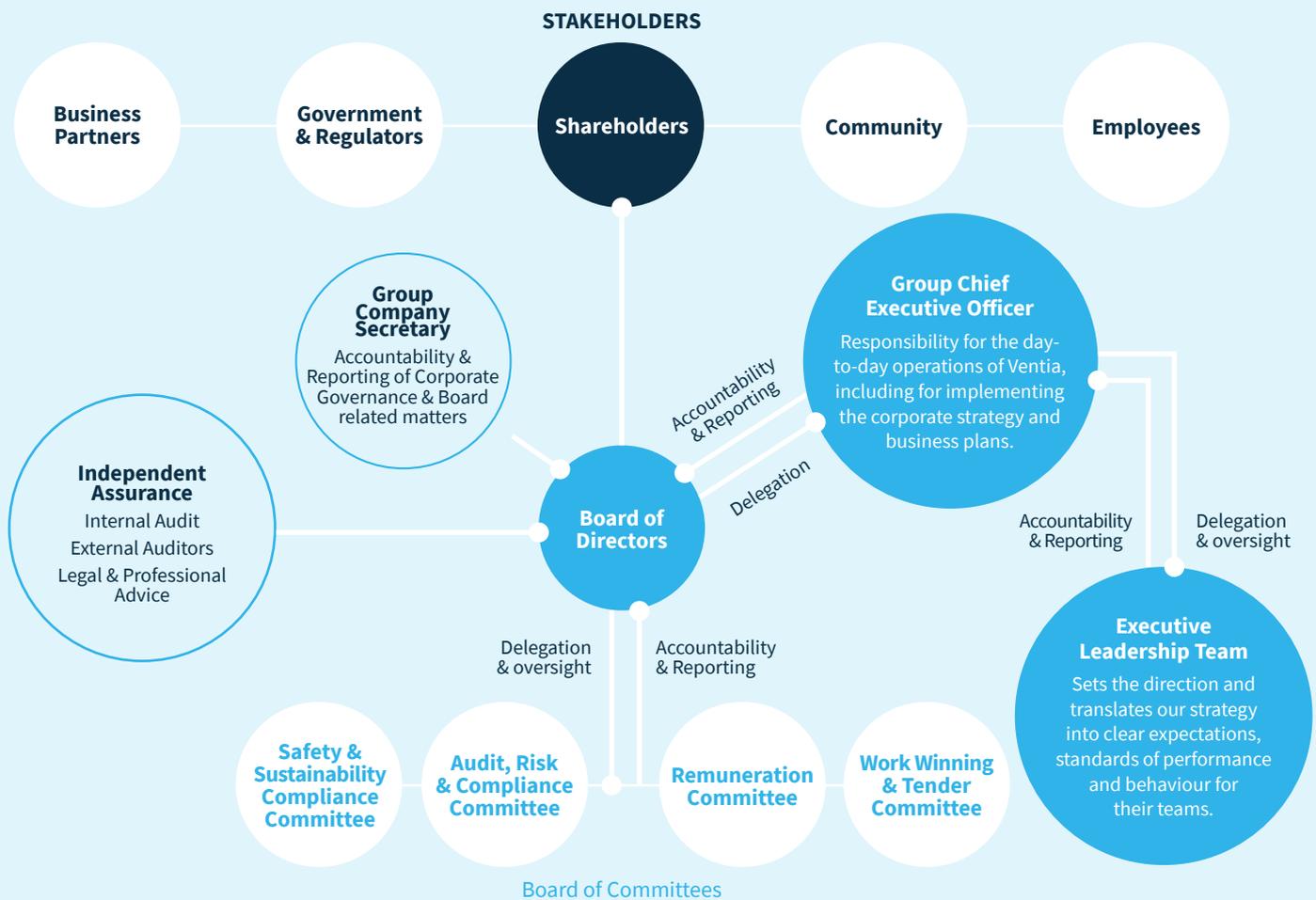
oversees the review of emerging risks, including any modern slavery risks, and the management of those risks by applying risk management policies and processes to the relevant parts of Ventia’s operations.

In 2020, Ventia established a Sustainability Council that provides leadership and governance on a number of sustainability, environment and governance issues including the implementation of activities relating to modern slavery risk in Ventia’s operations and supply chain. Through the Sustainability Council, a Modern Slavery Working Group was established which is responsible for developing and implementing Ventia’s approach for identifying and managing modern slavery risks.

In April 2021, the Board established a Safety and Sustainability Committee who will now oversee our approach to managing modern slavery risk in our supply chain.

## OUR CORPORATE GOVERNANCE STRUCTURE

Ventia’s Corporate Governance Framework



For more information about Ventia’s corporate governance framework, practices and policies please refer to our [2020 Corporate Governance Statement](#).

# POLICY FRAMEWORK

Underpinning our corporate governance framework are Ventia’s policies and standards, several of which are relevant to modern slavery. This includes our Code of Conduct, Modern Slavery Policy, Business Partners Standard and Whistleblower Protection Policy, which are summarised below.

## VENTIA’S CODE OF CONDUCT

Ventia’s Code of Conduct (**Code**), which was revised in 2020 following the acquisition and integration of Broadspectrum, sets a clear and consistent standard of behaviour that is expected from all our employees and third parties engaged by us, including our joint ventures, contractors and suppliers. It provides a single reference point to ensure we work safely, behave ethically, and abide by laws and regulations with every work decision, task and interaction.

Our Code guides what we value and how we work—with each other as well as our clients, service providers, suppliers and the communities in which we operate. It strengthens our relationships, inspires confidence in what we do and how we do it, and it protects Ventia and our reputation.

Contained within our Code are the conduct principles, covering in detail our commitments, minimum standards of behaviour and responsibilities. Each conduct principle is underpinned by key policies. The Code emphasises Ventia’s rejection of child and forced labour.

A copy of our Code can be found by clicking [here](#).

## EMPLOYEE TRAINING

At the commencement of employment, and thereafter annually, all Ventia employees are required to complete compulsory training on our Code. The training program is a requirement stipulated by the Audit, Risk and Compliance Committee which receives reports on progress of training towards 100% complete. The Code training program is updated annually to ensure issues which have arisen since the last training program are given appropriate importance.

## THIRD PARTY SUPPLIERS TO VENTIA

Ventia’s standard supplier and subcontractor contracts (including labour hire companies) require those third parties to understand and comply with our Code. If a third party is found to have acted contrary to the Code, Ventia has a range of corrective actions available to it, from collaboration and remediation through to the legal capacity to terminate working with that party.

## MODERN SLAVERY POLICY

The Board approved a Modern Slavery Policy in 2020. This policy confirms our commitment to the eradication of all forms of slavery. It requires a due diligence process to be put in place to analyse Ventia’s supply chains to ensure proper measures are taken to comply with the commitments set out in the policy. Ventia’s Business Partners Standard, and it’s associated due diligence, combined with our International Trade Controls and Anti Money Laundering Policy supplement our approach set out in our policy framework.



## WHISTLEBLOWER PROTECTION POLICY

Consistent with our commitment to maintaining a culture of integrity, Ventia has a Whistleblower Protection Policy in place to respond to reports of actual or suspected misconduct within Ventia and its operations. This policy applies to Ventia’s current and former employees, directors, contractors and suppliers, including employees of contractors and suppliers and any third party participant in our supply chain.

Genuinely held business concerns are reported either directly to our Group Compliance Officer or through an independent, anonymous, and secure service delivered by KPMG. Our Whistleblower Protection Policy and the avenues to report genuinely held business concerns is regularly communicated to all employees to raise awareness of the policy and explain key features such as how to make a Whistleblower report and the protections available to Whistleblowers. It is also made available to the public through our website.

## OTHER RELEVANT POLICIES

In addition to the above, Ventia has various policies in place to promote ethical and legal practices and behaviour in alignment with our values. They also are designed to protect the human rights of employees, contractors, business partners, suppliers, clients and the communities in which we operate in. These include the following:

- Bribery and Corruption Policy
- Bullying and Harassment Policy
- Diversity and Inclusion Policy
- EEO and Discrimination Policy
- Fair Treatment Policy
- Health and Safety Policy
- Privacy Policy
- Procurement Policy
- Sustainability Policy
- Workplace Behaviour Policy

We continuously review the effectiveness of our policies and processes to ensure they align with all legal and operational initiatives or obligations including the requirements of the Modern Slavery Act where applicable.

# OUR SUPPLY CHAIN MANAGEMENT



**14,910**  
Directly engaged  
suppliers (Tier 1)

More than **11,000**  
engaged within  
Australia, 3600  
in New Zealand

Less than **2%**  
(circa 310) suppliers  
located outside of  
these regions.

Following the acquisition of Broadspectrum in July 2020, we have been integrating the operations, and functions supporting, the two businesses. Modern slavery compliance was given priority in this process.

No Ventia entity “manufactures” goods—they use goods and services supplied primarily through authorised suppliers. We use these goods to create systems and other solutions, but at no time is Ventia an original equipment manufacturer.

For example, Ventia’s Telecommunications Sector uses goods such as cabling and fixed wireless telecommunication components in its works. While the end product of Ventia’s work will be a total solution for a client, Ventia will not have “manufactured” any individual component.

Ventia manages its procurement primarily through a group, centre-led function. Ventia’s commitment to local procurement ensures that more than 80% of

all goods and services are acquired locally (that is in Australia for use within Australia). This enables us to work closely with our suppliers and understand their operations and partnerships within their supply chain.

Whilst Ventia has transparency of its Tier 1 suppliers, we are progressing our understanding and assessment of the Tier 2 suppliers within our supply chain. This is an area of focus for us.

Projects in the field do procure goods and services directly from local suppliers should geographical circumstances require. For example, a Transport Sector project in the Pilbara Region of Western Australia may not be able to use a centralised supplier for all its requirements. The regional suppliers must still follow our governance systems and procedures to ensure compliance with our Risk Management Framework.

# RISK MANAGEMENT APPROACH

Ventia's modern slavery risk assessment processes are an integral part of Ventia's Risk Management framework.

Suppliers are assessed for risk and alignment against our Code, and our policies through their responses to our Business Partners Declaration and Business Partners Due Diligence at onboarding and throughout the procurement lifecycle.

Our standard form supply and subcontract agreements include obligations highlighting our management of modern slavery risk and associated legal and governance obligations.

During 2020, as part of our specific forced labour Supply Chain Risk Evaluation, Tier 1 suppliers were assessed using a Risk Assessment tool which incorporates International Validators (outlined below) together with sector, industry risks, product/services risk, geographic risks and entity risks. Ventia also included a review of the potential risk of COVID-19 on our supply chain.

## INTERNATIONAL VALIDATORS

As part of the assessment of our supply chain for modern slavery risk, we utilised the 2018 Global Slavery Index (GSI) data to benchmark our tier one international suppliers for both goods and services based on the supplier's main country of operation. The GSI provides a country by country ranking for 166 countries of the number of people in modern slavery. It also provides an analysis of the actions taken by governments to respond, and the factors that make people vulnerable, to modern slavery.

The United States Department of Labour 'List of Goods Produced by Child or Forced Labour' is a list of goods and their source countries which it has reason to believe are produced by child labor or forced labor in violation of international standards, as required under the United States Trafficking Victims Protection Reauthorization Act (TVPRA); the List of Goods Produced by Child Labor or Forced Labor comprises 155 goods from 77 countries, as of September 30, 2020. Ventia has incorporated this data into the assessment of our international supply chain, not only on basis of the country of operation but also on the type of goods procured.

## GEOGRAPHIC LOCATION OF PRODUCTS AND SERVICES

Geographic location for the production and provision of goods or services has been included in our due diligence process to determine associated risk within the supplier workforce such as low unionisation rates and remuneration.



## IDENTIFICATION OF PRODUCT AND SERVICE RISKS

We prioritise our assessment of our suppliers' human rights performance based on risk. We have identified suppliers with higher potential human rights risks. As a result, we have adopted a category-based approach to supplier risk management.

Ventia only imports directly from overseas suppliers a very small amount of the total product it purchases. Most of these suppliers are based in OECD defined low risk countries.

The risk analysis performed across the Ventia group found that human rights risks, including those linked to modern slavery, are more prominent in the supply of low value product for example protective vests and high visibility clothing. This product category has been a particular focus in the design of our supplier audit and engagement program.

We also assess suppliers' sustainability risks as part of the selection and contract renewal process to identify if equipment and clothing supplied to Ventia has been produced in a situation likely to involve modern slavery risks such as labour conditions.

Where suppliers are unable to satisfy us that they have appropriate risk management controls in place, or are unwilling to share this information, we may take further action, such as engaging senior management, implementing a remediation plan, or suspending the supplier's contract.

Our top supplier categories for 2020, which constitutes over 60% of Ventia's combined total spend were:

1. Facilities Management—56% of total spend
2. Construction—12% of total spend
3. Asset Management—7% of total spend.

It is important to note that the provision of services, as opposed to the supply of goods or materials, are the dominant aspect of suppliers within these categories.

Product and services risks were identified in the following categories with low to medium level risk of potential modern slavery:

- Personal Protective Equipment and Workwear
- Promotional Items
- Cleaning Services
- Cleaning Equipment
- Fresh fruit, vegetables, and seafood, and
- Technology services and equipment

Suppliers identified in the above categories represent less than 3% of our total spend.

Certain suppliers identified through our risk assessment were required to complete our Modern Slavery Self-Assessment Due Diligence questionnaire. A targeted group of these suppliers have been identified to participate in a pilot program based on

their response to our assessment. The purpose of the program is to collaborate and enhance the supplier's knowledge and approach to modern slavery risk within their supply chain.

## OUTCOME

**No instances of modern slavery were identified through the process outlined above that was undertaken during the period relevant to this Modern Slavery Statement.**

## ONGOING RISK MITIGATION MEASURES

Ventia has designed a modern slavery due diligence questionnaire. We will use this when we propose to work with a new supplier directly from overseas.

The modern slavery questionnaire is supplemented by our Business Partners Due Diligence. This requires all new suppliers who we anticipate we will spend more than AUD1 million in a year to execute a due diligence questionnaire.

New suppliers are required to disclose their compliance with modern slavery laws and other relevant human right laws.

This due diligence is refreshed annually.

We have consulted with a range of stakeholders on our approach to the eradication of modern slavery throughout 2020 including our subsidiaries, joint ventures, clients, potential clients, suppliers, business units and employees. This process is documented within our modern slavery consultation plan.

During the reporting period, we worked collaboratively with key business peers to strengthen our response to modern slavery through the Infrastructure Sustainability Council of Australia (ISCA) Road Sector Modern Slavery Coalition (**Coalition**). The Coalition was established by ISCA in 2019 to support businesses to assess and address modern slavery risks in the road infrastructure sector and focuses on:

- supporting collaborative solutions to modern slavery risk management;
- driving industry good practice to support compliance with the Act; and
- building members' capacity to manage modern slavery risks.

As part of its work programme over 2020/21, the Coalition identified and engaged with two pilot supply chains, PPE and bitumen, in order to understand potential modern slavery risks associated with the procurement of these products.

Increased consultation with our suppliers has been implemented to assist in their understanding of modern slavery risk and ensure they understand our requirements. This increased engagement will be built upon annually to ensure all suppliers are kept up to date with any changes we require.

## MEASUREMENT OF EFFECTIVENESS

We are committed to measuring the effectiveness of our risk mitigation actions.

We measure the effectiveness of our modern slavery response based on the following:

- the quality of the responses we receive from our business partners on how they are managing modern slavery;
- the number of reported incidents of modern slavery detected in our due diligence;
- self-reporting from our business partners of identified or suspected modern slavery issues; and
- the quality of responses from our business partners if and when a suspected or actual modern slavery incident is identified.

In addition, as part of our commitment to continuous improvement, we will also undertake an annual assessment to understand how our business increases its visibility of and manages the risk of modern slavery occurring in our business and supply chains. This will include a focus on supplier relations and trends through grievance mechanisms.

### Outline of our Annual Assessment Plan

Role	Objectives	Measure Effectiveness
As a purchaser of goods and services	Improve the quality of the Modern Slavery Self-Assessment Questionnaire	Percentage of suppliers completing the self-assessment
	Increase participation with industry.	Report on participation with industry groups and forums to demonstrate commitment to improvements in assessing risk in our supply chain
	Ongoing Supply Chain Risk analysis	Improve transparency of Tier 2 suppliers. Increase collaboration with suppliers identified with potential risk of modern slavery
As an employer	Provide training	Code of Conduct training is mandatory and includes our approach to modern slavery
	Increase awareness of modern slavery risk mitigation and grievance mechanisms	Collate data to support the attendance at training and online resources to all employees. Collect and report on data where grievance mechanisms is utilised



# CASE STUDIES

## FACILITIES MANAGEMENT CASE STUDY

We provide facilities management services to an international mining company. We manage four camp sites, accommodating over one thousand people in remote Queensland.

Our client requested information regarding the source of cotton used in clothing and other uses in the camp. It was concerned to confirm that the cotton is not sourced from a particular province in China.

We were able to respond positively that the three suppliers used to source clothing etc in the camp did not source cotton from the province causing the concern. We had conducted due diligence on the suppliers previously, and in addition we had asked them the specific question raised by the client. This response was provided to the client inside its deadline.

## DELRON CASE STUDY

Delron is one of our subsidiaries, who offer cleaning, maintenance, environmental and specialist services requirements nation-wide. Cleaning services is one of our identified critical commodities for modern slavery risk, we provided extensive support to Delron to incorporate Ventia's modern slavery risk management framework into its processes, starting from identifying human risks present in their value chain. Collaboration with Delron led to the identification of Delron engaging cleaning service providers as Delron's subcontractors as a high-risk business practice in terms of human rights risk.

Delron recognised that engaging subcontractors to deliver cleaning services on their behalf posed a significant level of risk due to limitations on workforce visibility as well on the implementation of control measures to mitigate such risk.

We supported Delron in identifying risk based on location, pre and post COVID-19 spend as well as cleaning service-subcontractor-specific controls in place to mitigate modern slavery risks.

Clear risk-mitigation actions were identified in collaboration with Delron, these included enhanced responsive due diligence applied to all cleaning service subcontractors, further investigation into the composition of subcontracted workforce and the identification of collaboration with subcontractors as a key measure to achieve effectiveness in acknowledging, strategizing and finally mitigating modern slavery risk in Delron's value chain.

# APPENDIX 1: REPORTING ENTITIES

1. Ventia Utility Services Pty Limited
2. Silcar Pty Ltd
3. Delron Cleaning Pty Limited
4. Visionstream Pty Limited
5. Visionstream Australia Pty Ltd
6. Ventia Pty Limited
7. Ventia Australia Pty Ltd
8. Easternwell Group Assets Pty Ltd
9. Easternwell Group Investments Pty Limited
10. Easternwell Group Operations Pty Ltd
11. Easternwell Group Pty Ltd
12. Easternwell WA Pty Ltd
13. Piver Pty Ltd
14. ICD (Asia Pacific) Pty Limited
15. APP Corporation Pty Limited
16. Trace Joint Venture
17. Amey Broadspectrum Joint Venture