



Modern Slavery Statement

2022 Financial Year

Introduction

Identifying the reporting entities

This joint modern slavery statement is made by:

- VINCI Construction Australia Pty Ltd ACN 620 283 132;
- VINCI Construction Australasia Management Pty Ltd ACN 620 371 477;
- Seymour Whyte Contractors Pty Ltd ACN 105 493 203; and
- Seymour Whyte Constructions Pty Ltd ACN 105 493 187

(collectively, **Seymour Whyte**).

Seymour Whyte is a civil contractor that delivers major essential infrastructure projects across Australia. Whilst our core business is in roads and bridges, we also deliver engineering and construction services to the airport, rail, ports and marine, resources and renewable energy, social infrastructure and water sectors.

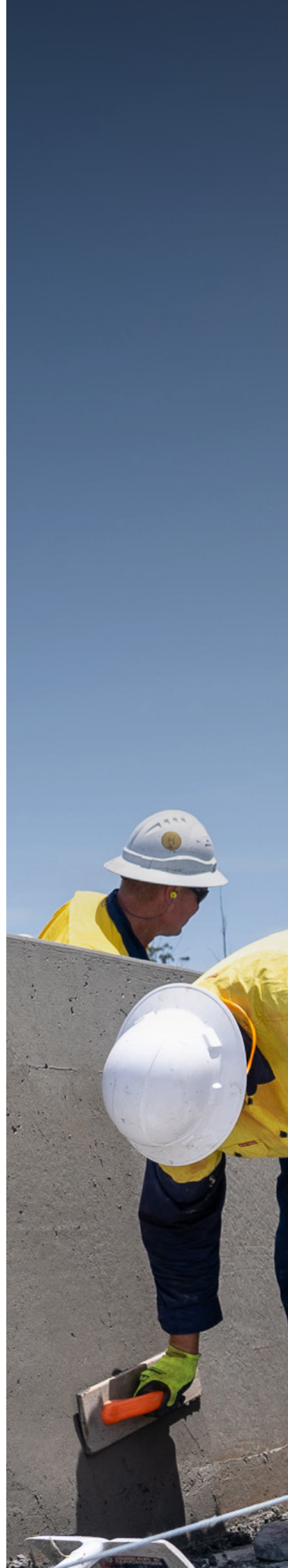
Seymour Whyte acknowledges the harm caused by modern slavery and is committed to a continuous improvement approach to identifying and addressing the modern slavery risks in our operations and supply chains.

This statement for the 2022 financial year is made pursuant to the Modern Slavery Act 2018 (Cth). It has been approved by the boards of VINCI Construction Australia Pty Ltd, VINCI Construction Australasia Management Pty Ltd, Seymour Whyte Contractors Pty Ltd and Seymour Whyte Constructions Pty Ltd (the **Boards**) and has been signed by a member of each board.



John Kirkwood

Chief Executive Officer and Managing Director of Seymour Whyte Contractors Pty Ltd and Seymour Whyte Constructions Pty Ltd and Director of VINCI Construction Australia Pty Ltd and VINCI Construction Australasia Management Pty Ltd





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Our structure, operations and supply chain

Structure

Each of the Seymour Whyte reporting entities are private companies. The corporate structure is set out in the figure and table below.

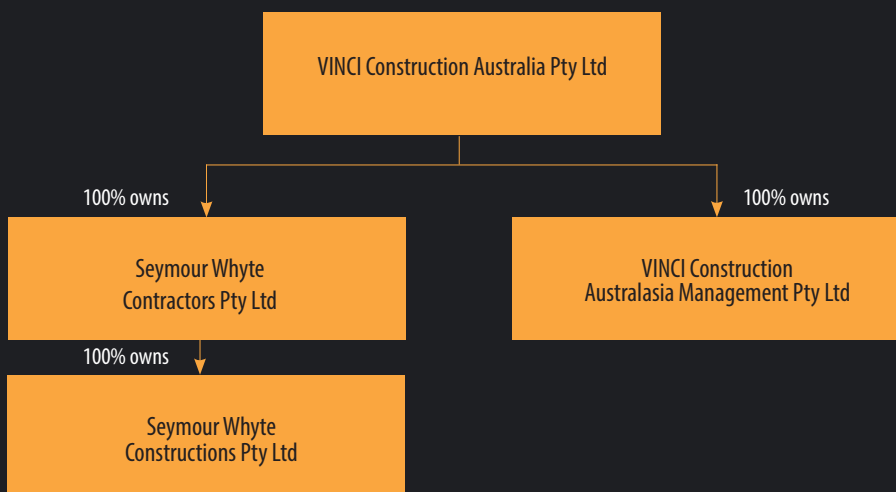


Figure 1. Seymour Whyte corporate structure

1. VINCI Construction Australia Pty Ltd – holding company.
2. VINCI Construction Australasia Management Pty Ltd – employing entity.
3. Seymour Whyte Contractors Pty Ltd – holding company.
4. Seymour Whyte Constructions Pty Ltd – trading entity.

Seymour Whyte employs over 765 people across Queensland, Western Australia, New South Wales and Victoria. Our headquarters are located in Eight Mile Plains, Queensland and we have offices in Sydney, Melbourne, Adelaide and Perth.

The ultimate parent company of Seymour Whyte is VINCI SA (**VINCI**) – a global player in integrated concessions and construction. VINCI employs approximately 272,000 people in more than 120 countries.



Operations

Seymour Whyte's main business is undertaking civil contracting to deliver essential infrastructure projects across Australia. We deliver complex, innovative projects that include difficult staging, engineering and environmental challenges, logistical constraints and stakeholder impacts.

To date, we have delivered more than 537 projects across Australia.

Given the size of many of our projects, Seymour Whyte often enters into joint venture arrangements with other entities. Although Seymour Whyte engages closely with its joint venture partners, it does not have control over those entities or responsibility for the management of those entities.

Seymour Whyte's principal joint venture partners in the 2022 financial year were:

1. Fulton Hogan;
2. Downer;
3. John Holland;
4. Civec;
5. CPB Contractors;
6. BMD Constructions; and
7. Spiecapag Australia.

Seymour Whyte's most significant projects in the 2022 financial year were:

1. Bruce Highway upgrade – Edmonton to Gordonvale (a joint venture project with John Holland);
2. Pacific Motorway upgrade – Palm Beach to Tugun;
3. Port Rail Transformation project;
4. Pound Road West upgrade;
5. Sydney Gateway – Stage 1 and Stage 3.

Investments

None of the Seymour Whyte reporting entities have an investment portfolio or lend money.

Supply Chains

In the 2022 financial year, Seymour Whyte spent approximately \$430 million purchasing products and services from more than 1,641 direct suppliers across 10 countries.

Most of Seymour Whyte's direct suppliers are located in Australia, with overseas procurement accounting for only about 0.20% of our total procurement spend.

Seymour Whyte also has direct suppliers located in the United States, United Kingdom, Ireland, Denmark, Germany, New Zealand, Singapore, Malta and Canada.

The main types of goods and services Seymour Whyte procures include:

1. Personnel, including via contractors and labour hire – all such personnel are located in Australia;
2. Logistics;
3. Plant and equipment;
4. Quarry products;
5. Concrete products;
6. Asphalt products; and
7. Road furniture.



Modern Slavery Risks

The risk of modern slavery in Seymour Whyte's operations is low. Seymour Whyte's workforce is located in Australia and enjoys the protections of:

1. Modern Awards and industrial instruments;
2. The National Employment Standards;
3. The various State and Territory work health and safety regimes;
4. The various State, Territory and Commonwealth anti-discrimination regimes; and
5. Seymour Whyte's own policies relating to Quality, Privacy, Remuneration and Benefits, Industrial Relations Management, Health and Safety, Modern Slavery, Rehabilitation and Return to Work, Aboriginal and Torres Strait Islander Participation, Acceptable Behaviour in the Workplace, Diversity and Human Resources Management.

Seymour Whyte has assessed as low the risk that its operations or supply chains might cause or contribute to modern slavery practices.

The principal risk of modern slavery in Seymour Whyte's operations and supply chains is that it might be directly linked to modern slavery practices through the activities of its overseas suppliers. Seymour Whyte has identified the following goods and services purchased in 2022 as representing the greatest risk of modern slavery:

- Seymour Whyte made various purchases of software and information technology services from companies in USA, Canada, Malta, New Zealand, Germany, Ireland, Denmark, Singapore and the United Kingdom; and
- While assessed as lower risk, Seymour Whyte procured some software and information technology services from overseas software / IT companies, which have committed to maintaining data security in alignment with Seymour Whyte requirements. Seymour Whyte is unable to control where and how the software is written/developed prior to being sent to Australia.



Action taken to assess and address modern slavery risks

Policies, systems and processes

Seymour Whyte has in place policies and procedures dealing with health and safety, diversity and inclusion, and whistleblowing – all of which encourage the confidential reporting of concerns.

Seymour Whyte has introduced terms into all contracts with suppliers which require suppliers to:

1. Warrant that modern slavery practices do not occur within their own business;
2. Warrant that, to the best of their knowledge, modern slavery practices do not occur within the business of their suppliers;
3. Promptly disclose the occurrence of any modern slavery practices within their own business or supply chains.

Seymour Whyte has the power to terminate a supply contract if a supplier breaches legislative requirements.

Due Diligence

Seymour Whyte's modern slavery subcommittee members include:

- Company Secretary / CFO;
- General Counsel;
- Chief Operating Officer (COO); and
- General Manager, Northern & Western Regions.

The subcommittee performed the following tasks in the 2022 financial year:

1. Reviewed the risks of modern slavery within Seymour Whyte's operations and supply chains;
2. Reported to the Boards in relation to the findings and recommendations of the subcommittee; and
3. Assisted the Boards to gather all information required for Seymour Whyte's annual modern slavery statement.

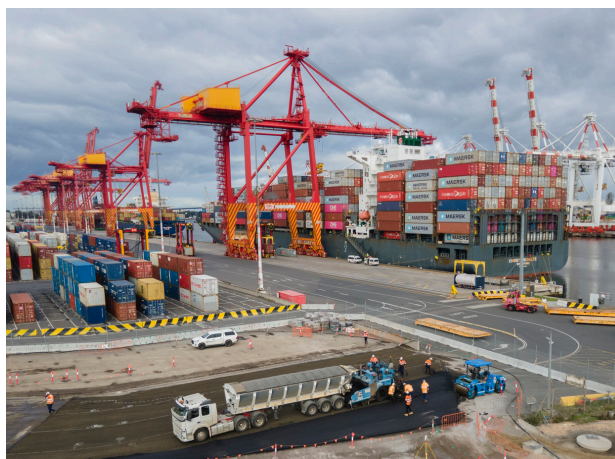
While the following tasks were not required in the 2022 Financial Year, the subcommittee is also responsible for:

4. Overseeing the investigation of any reports of modern slavery within Seymour Whyte's operations and supply chains (no reports were received in the 2022 financial year);
5. Making recommendations to the Boards regarding remedial actions in the event of modern slavery occurring within Seymour Whyte's operations or supply chains; and
6. Making recommendations to the Board in the event of any supplier non-compliance with modern slavery auditing (no non-compliances were identified in the 2022 financial year).

Remediation

Upon receiving any substantiated report of a modern slavery incident, or receiving any report of supplier non-compliance, the Boards will meet promptly to consider what remediation actions are appropriate.

As the risk of a modern slavery incident occurring within Seymour Whyte's operations or supply chains is low, it is anticipated that the principal forms of remediation will include reviewing and improving existing policies and procedures, and ceasing certain activities (including terminating relationships with non-compliant suppliers).



Assessing the effectiveness of actions taken

Seymour Whyte's modern slavery subcommittee reviewed the effectiveness of the actions taken in 2022 by:

1. Engaging with key areas of the business, with a view to understanding all operations, suppliers, and the unique risks associated with them;
2. Auditing all supplier contracts entered into with a view to ensuring that all contracts include clauses dealing with modern slavery;
3. Issuing annual audit forms to suppliers; and
4. Identifying any new risks of modern slavery.

Seymour Whyte Constructions Pty Ltd's board:

1. met with the subcommittee to discuss and review the findings and recommendations of the subcommittee; and subsequently
2. updated the balance of the Boards regarding the subcommittee's findings and recommendations.

Our consultation process

There was limited consultation between the reporting entities covered by this statement because each of the entities share four common directors.

This statement was approved by the board of each reporting entity.



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