

Modern Slavery Statement

2020 Financial Year

Introduction

Identifying the reporting entities

This joint modern slavery statement is made by:

- VINCI Construction Australasia Pty Ltd ACN 620 283 132;
 - VINCI Construction Australasia Management Pty Ltd ACN 620 371 477;
 - Seymour Whyte 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 2020 financial year is made pursuant to the *Modern Slavery Act 2018* (Cth). It has been approved by the boards of VINCI Construction Australasia Pty Ltd, VINCI Construction Australasia Management Pty Ltd, Seymour Whyte 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 Pty Ltd and Seymour Whyte Constructions Pty Ltd and Director of VINCI Construction Australasia Pty Ltd and VINCI Construction Australasia Management Pty Ltd



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.

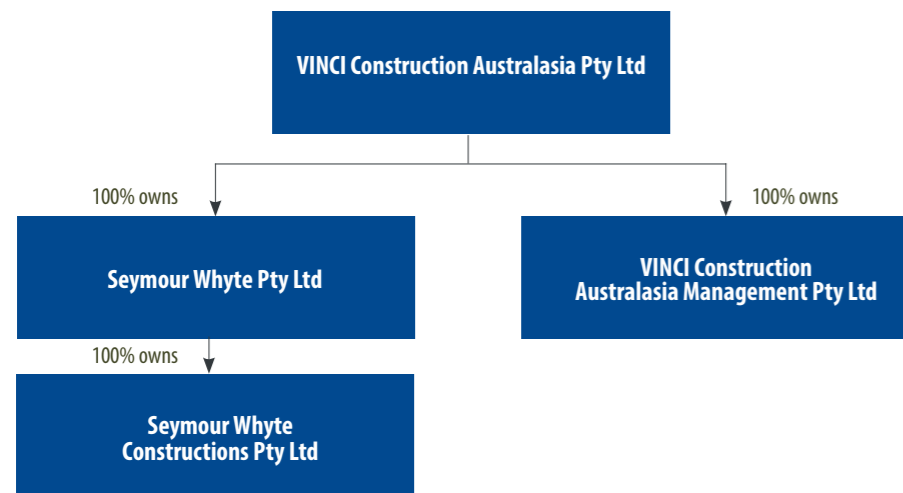


Figure 1. Seymour Whyte corporate structure

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

Seymour Whyte employs over 400 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 and Perth.

In October 2017, Seymour Whyte Pty Ltd and Seymour Whyte Constructions Pty Ltd became a wholly owned subsidiary of VINCI Construction International Network (VCIN).

The ultimate parent company of Seymour Whyte is VINCI SA (**VINCI**) – a global player in integrated concessions and construction. VINCI employs over 217,000 people across 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 535 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 2020 financial year were:

1. Fulton Hogan;
2. Downer;
3. John Holland; and
4. Spiecapag Australia.

Seymour Whyte's most significant projects in the 2020 financial year were:

1. Bruce Highway upgrade – Caloundra Road to Sunshine Motorway (a joint venture project with Fulton Hogan);
2. Bruce Highway upgrade – Edmonton to Gordonvale (a joint venture project with John Holland);
3. Bruce Highway upgrade – M2M (a joint venture project with John Holland)
4. Pacific Motorway upgrade – Varsity Lakes to Burleigh;
5. Pacific Motorway upgrade – Palm Beach to Tugun;
6. Pacific Motorway upgrade – Mudgeeraba to Varsity Lakes;
7. Pacific Motorway upgrade – Woolgoolga to Ballina;
8. Upper Yarra Dam safety upgrade;
9. Burrendong Dam deep water storage access;
10. Mardi to Warnervale pipeline (a joint venture project with Spiecapag Australia);
11. M4 Smart Motorway;
12. Barton Highway Upgrade Project;
13. Princes Highway Upgrade between Berry and Bomaderry; and
14. 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 2020 financial year, Seymour Whyte spent approximately \$329 million purchasing products and services from more than 1,165 direct suppliers across nine (9) countries.

Most of Seymour Whyte's direct suppliers are located in Australia, with overseas procurement accounting for only about 0.12% of our total procurement spend.

Seymour Whyte also has direct suppliers located in the United States, United Kingdom, Ireland, Denmark, Germany, Philippines, China, Turkey 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 as representing the greatest risk of modern slavery:

- In 2020 Seymour Whyte made various purchases from companies in USA, Canada, Turkey, Philippines, China, Germany, Ireland, Denmark and the United Kingdom.
- Cladding sourced from China (QuingDao) presents a risk because Seymour Whyte has no visibility of the manufacturing process employed by the supplier.
- Two (2) pieces of batch plant equipment sourced from Turkey present a risk because Seymour Whyte has no visibility of the manufacturing process employed by the supplier or the origin of the parts used in the manufacturing process.
- Three (3) paver machines purchased from the USA present a risk because Seymour Whyte has no visibility of the manufacturing process employed by the supplier or the origin of the parts used in the manufacturing process.

While assessed as lower risk, Seymour Whyte has procured some software and information technology services from US software / IT companies. Seymour Whyte is unable to control where and how the spare parts are manufactured 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. Complete an annual audit form regarding the risks of modern slavery within their business or supply chain;
4. 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 has formed a modern slavery subcommittee. Members of the subcommittee include:

- Company Secretary / Chief Financial Officer;
- General Counsel;
- General Manager Northern Region; and
- General Manager Southern Region.

The subcommittee will meet bi-annually in order to identify any new risks of modern slavery, and to assess the adequacy of the measures implemented to address identified risks of modern slavery.

The subcommittee will be responsible for:

1. Reviewing on an ongoing basis the risks of modern slavery within Seymour Whyte's operations and supply chains;
2. Overseeing the investigation of any reports of modern slavery within Seymour Whyte's operations and supply chains;
3. Making recommendations to the Boards regarding remedial actions in the event of modern slavery occurring within Seymour Whyte's operations or supply chains;
4. Reviewing the annual audit forms completed by suppliers and making recommendations to the Board in the event of any supplier non-compliance;
5. Reporting to the Boards at least once annually in relation to the findings and recommendations of the subcommittee; and
6. Assisting the Boards to gather all information required for Seymour Whyte's annual modern slavery statements.

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 will review the effectiveness of the actions taken by providing the modern slavery subcommittee with the resources required to:

1. Engage with key areas of the business, with a view to ensuring the subcommittee has a proper understanding of all operations, suppliers, and the unique risks associated with them;
2. Audit all supplier contracts entered into with a view to ensuring that all contracts include clauses dealing with modern slavery;
3. Review the annual audit forms completed by suppliers; and
4. Review Seymour Whyte's modern slavery risk assessment processes.

Seymour Whyte Constructions Pty Ltd's board will:

1. meet with the subcommittee at least once annually to discuss and review the findings and recommendations of the subcommittee; and subsequently
2. update the balance of the Boards regarding each meeting with the subcommittee.

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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