

Modern Slavery Statement 2024

GROSVENOR]
engineering group

Foreword

This Modern Slavery Statement has been made by Grosvenor Engineering Group (GEG), pursuant to Section 16 of the Modern Slavery Act 2018 (Cth) for the period 1 July 2023 to 30 June 2024. Entities covered within GEG include:

- Grosvenor Engineering Group Pty Ltd [ABN 12 003 608 795]
- Grosvenor Engineering Group (QLD) Pty Ltd [ABN 65 650 298 481]
- Grosvenor Engineering Group NZ Limited [Company No. 8191460]
- SYNTRIC Pty Ltd [ABN 67 096 741 687]
- Apeiron Research & Technology Pty Ltd [ABN 83 154 849 528]

During the reporting period this statement covers our active engagement and consultation within all companies we own or control in the development of this Statement. This process included discussions that underpinned the Modern Slavery Act 2018 reporting requirements; information regarding the actions, we have taken to address the requirements and provide details of the relevant materials and updates.

GEG has a zero tolerance for Modern Slavery, and we actively encourage the same stance and commitment from all our suppliers. This Statement also outlines the steps that GEG has taken to identify and address Modern Slavery risks to our operations and supply chain/s. In FY22 we introduced our Modern Slavery Questionnaire as an addendum to our Supplier Code of Conduct. Since implementation, we have continued to request our suppliers to complete our GEG Modern Slavery Questionnaire and submit a declaration that they have done so. The data provided via the completion of our Modern Slavery Questionnaire enables us to identify potential Modern Slavery risks, further consult with our suppliers to understand of any issues and mitigate any potential risks to GEG by this proactive process.

Our GEG continuous improvement agenda also includes the review, integrity and quality of our supply chains, along with reviewing our Modern Slavery Risk Framework. This approach enables GEG to conduct suitable risk assessments, grade and prioritise their resolution. This approach ensures we can mitigate of the occurrence of a Modern Slavery breach.



Nicholas Lianos

Executive Chairman & CIO

17 July 2024



Peter Souflias

Executive Director

17 July 2024

Purpose and Values

Our purpose is to enrich people’s lives by transforming the built environment. Our values include:



Safety

We are relentless about ensuring everyone returns home safe and well every day.



Agility

Our data enables us to be curious, proactive and deliver the best outcomes.



Balance

We encourage everyone to find their own ideal balance between work and life.



Partnerships

Diverse backgrounds, thinking and skills, working together, make us a force to be reckoned with.

Our Corporate Social Responsibility

We strive to make a difference. We are committed to working and acting in a socially responsible manner towards each other and all those with whom we interact. We endeavour to behave ethically and contribute to economic development; while improving the quality of life of our employees, their families, our local community and society at large.

Audits

Our Auditors consistently capture data on each asset and customise maintenance schedules to suit each asset’s lifecycle and individual requirements. Unique asset identification enables our Technicians and Engineers to inspect, test, maintain and report on individual assets.



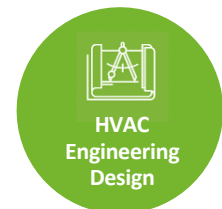
Sustainability

We specialise in the maintenance of Operational Technology equipment and systems that run the building. Our Sustainability Engineers make recommendations to ensure that optimal environment, economic and social improvements for the buildings that we undertake maintenance services for can be achieved.



HVAC Engineering Design

Our dedicated Engineering Design Team support with HVAC refurbishments and construction projects. This support ranges from upgrades and/or retrofitting of old and obsolete HVAC assets. The objective is to significantly improve our client’s the building performance, energy efficiency and occupant comfort.



With a footprint of 21 branches across Australia and New Zealand, our clients are supported by a workforce of over 800 employees which include specialist engineers, technicians, project managers, estimators, site personnel, and service specialists.



Supply Chain

We understand that Modern Slavery, regardless of whether human trafficking, slavery and slavery-like practices can occur in every industry and sector and have severe consequences for the victims. We support the protection of human rights and are acutely aware that this is a growing area of importance to our employees, shareholders, and customers. GEG is committed to identifying and mitigating Modern Slavery risks, should it become evident in our supply chains.

In FY24, GEG's total supplier spend was in excess of \$28.2 million. GEG has partnered with 2,388 suppliers in FY24 across all our various corporate, operational functions and development activities. An overview of our classified supplier categories is outlined in the table below:

Category	Sum of Approved Cost
Building and Construction	\$27,094,714.75
Cleaning and Security Services	\$138,631.76
Events and Event Management (Conferences/Marketing)	\$236,968.63
Food & Catering Services	\$370,416.08
Furniture and Office Supplies	\$204,773.21
Uniforms and PPE	\$105,878.93
Waste Management Services	\$110,646.67
Grand Total	\$28,262,030.03

As GEG operates only in Australia and New Zealand, most of our procurement spend (by value) with suppliers is based on a contractual relationship with our Australian Tier 1 suppliers. We recognise that these suppliers may procure materials and services from international companies. This is more prevalent in our Tier 2 suppliers (i.e., suppliers of the Tier 1 suppliers) and subsequent tiers.

Modern Slavery Risk Framework

GEG's Modern Slavery Risk Framework is based on a risk management approach with the key objective of ensuring compliance and continual improvement. We have implemented policies and procedures to ensure ethical and legal practices are aligned with our organisational values and promote the protection of human rights of employees, contractors, business partners, suppliers, clients, and the communities within which we operate.

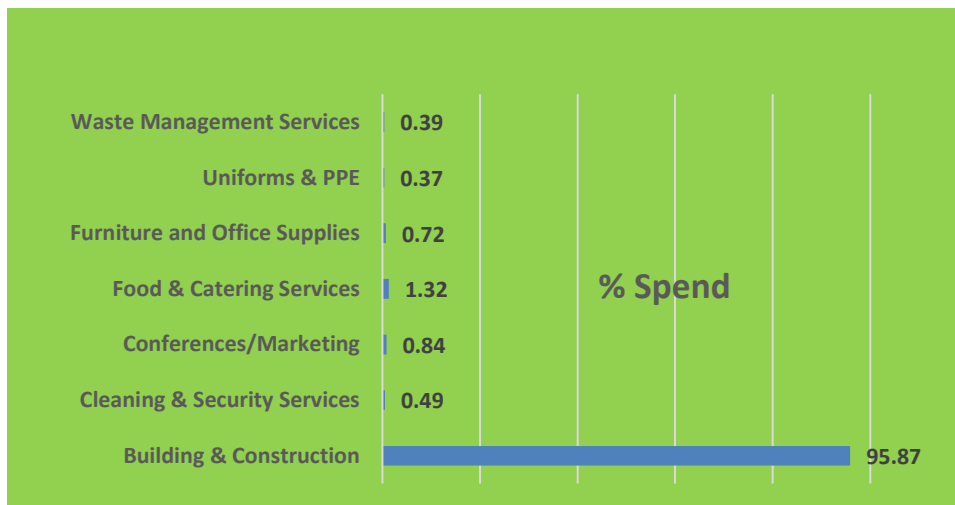
Responsible Sourcing

At GEG we monitor and review our business practices, so that high moral, ethical and sustainable practices are upheld during our resourcing process. We are committed to the protection of human rights and being employer of choice through our stance on equal opportunity for all. We adhere to all fair labour laws and go out of our way to ensure that our activities do not directly or indirectly violate human rights in any country. We select and work with suppliers who align with our values and respect safe, fair, and sustainable working environment. We have also introduced business guidelines that stipulate our standards and how we engage and interact with suppliers. These standards were implemented to ensure that GEG meets our obligations under the Modern Slavery Act 2018.

Due Diligence

GEG actively engages and collaborates with stakeholders to identify and understand the impact of our activities and to mitigate negative impact. Due diligence practices were implemented and are adhered to, so we prevent and mitigate adverse impacts. Through the responses received in our Modern Slavery Questionnaire, GEG records and evaluates any potential risks associated with the above Modern Slavery risk factors.

Typical categories identified within GEG supply chain include:



Actions to address Modern Slavery Risks

Supplier Code of Conduct

GEG views our suppliers as business partners. Our Supplier Code of Conduct defines the minimum standards of behaviour that we expect from our suppliers, in order to meet in the areas of labour and human rights, non-discrimination, bullying, harassment and discrimination, wages, benefits, working hours, workplace health and safety, environment, business integrity, privacy, and supplier diversity.

GEG management of Modern Slavery is an important agenda in our overall approach to protecting human rights. Our Supplier Code of Conduct outlines GEG expected standard of behaviour and conduct from our suppliers. We actively monitored and managed to ensure adherence to the Code. All GEG suppliers must have read, understood, and agreed to our Supplier Code of Conduct, prior to us conducting any business transaction. In addition to suppliers' compliance with our Supplier Code of Conduct, we expect them to ensure that their suppliers also comply with similar principles outlined in our Supplier Code of Conduct. This is important as these principles operate in conjunction with our values and our need for a safe, fair, and sustainable working environment, including those relating to human rights.

Supplier Onboarding

GEG has incorporated our Modern Slavery Statement into our "Request for Pricing" process. This ensures our potential or future suppliers are aware of our stance and position in relation to this subject. Our Modern Slavery position is also included in our "New Supplier Request Form", so new supplier/s have been advised. In FY22 we implemented in the completion our GEG's Modern Slavery Questionnaire to all our suppliers. This practice was to create awareness on Modern Slavery and help to identify practices that constitute it. The data gathered since FY22 has enabled us to identify potential Modern Slavery risks and further consult with our suppliers to better understand any issues that they may be facing.

Where appropriate, potential suppliers are asked to provide additional information to address our concerns on human rights and Modern Slavery risk. This includes information on how their organisation manages and mitigates any associated risks. In addition, all our suppliers are required to acknowledge GEG Supplier Code of Conduct. The Code of Conduct outlines our commitment and expectations of their conduct in maintaining human rights standards including the elimination of child, bonded, forced, or involuntary labour in accordance with international and domestic best practice. Where a potential supplier is not able to demonstrate their compliance with these requirements, we do not conduct business with them.

The Modern Slavery provisions also require suppliers to notify GEG if they become aware of an instance of Modern Slavery in their supply chain. As per our Modern Slavery Policy Statement, a breach of these Modern Slavery provisions may result in GEG terminating the supplier contractual arrangement.

Desktop Supplier Assessments

In FY21, we conducted an evaluation of 25 key suppliers, which represented our top 25 high annual spend at that time. We were pleased to report there were nil Modern Slavery risks identified. From FY22 the completion of the GEG Modern Slavery questionnaire became a standard practice with all GEG suppliers and has continued since then. In FY24, the questionnaire practice continues with the 2,388 suppliers that GEG conducts business with, which represents a total spend of over \$28.2 million annually to deliver its activities in Australia.

Risk Assessment

In FY23, 2,275 suppliers were assessed for risk based on the four identified Modern Slavery risk factors and their alignment to our Code, and policies through their responses to our GEG Modern Slavery Questionnaire. This process was conducted as part of the onboarding process and procurement lifecycle. We identified seven suppliers as participating in high-risk industries across our supply chain. We reviewed their responses from the Modern Slavery questionnaire and clarified any potential concerns in writing. We also provided additional information to address our concerns on human rights and Modern Slavery risk. Information shared included how those risks should be mitigated and managed by their organisation. GEG was satisfied with the responses received and determined there were no Modern Slavery risks identified that needed to be addressed.

Key Policies

GEG is committed to a high standard of ethical behaviours when we conduct our business dealings. We have a wide range of policies and procedures that clearly convey the standard of behaviour expected of our directors, employees, and contractors. A summary of the key policies relating to our management of modern slavery is set out below.

Policy	Description
Supplier Code of Conduct	This code sets out the minimum standards that we expect our suppliers to meet in the areas of labour and human rights, non-discrimination, bullying, harassment and discrimination, wages, benefits, working hours, workplace health and safety, environment, business integrity, privacy, and supplier diversity.
Whistle-blower Policy	This policy sets out our commitment to identifying and addressing misconduct, including suspected or actual contraventions of human rights, and encourages the reporting of such conduct safely, securely and without fear of detriment. Throughout the reporting period, an independent hotline was available for the reporting of misconduct with processes in place for the investigation of those reports.
Diversity Statement	This statement sets out our commitment to creating and promoting a fair and inclusive workplace promoting diversity, inclusion and equal workforce participation.
Sustainable Procurement Statement	This statement outlines our strong belief in the advantages of sustainable procurement and seeks to contribute positively to society and the economy through making sustainable purchasing decisions and encouraging our suppliers to do the same.
Code of Conduct	This code outlines standards of behaviour for all employees that promotes GEG Core Values.
Bullying & Equal Employment Opportunity (EEO) Policy	This policy sets out our commitment to creating and promoting a fair and inclusive workplace

	promoting diversity, inclusion, and equal employment opportunities.
Anti-Bribery and Anti-Corruption Policy	This policy sets out our zero tolerance of bribery and corruption and outlines the expectations of directors, employees and third parties to act in accordance with this policy and not engage in any form of bribery and corruption.

Remediation

GEG is committed to remediating any identified instances of human rights and Modern Slavery abuse in our operations and supply chains should they arise. Our Policies and procedures such as our Whistle-Blower Policy, Bullying & Equal Opportunity Policy, etc. provide a framework within which our workforce can raise concerns and grievances which will be managed fairly, independently, and impartially. Where non-conformances or risks of Modern Slavery are identified within our supply chain, GEG will partner with the supplier to further evaluate the matter and implement a corrective action plan, agreed timeframes and review mechanisms to ensure compliance.

Environmental, Social and Governance (ESG) Compliance

To demonstrate our commitment to all stakeholders on managing Modern Slavery risks and implementing a sustainable business model, GEG has registered with EcoVadis who facilitates the evaluation of a business sustainability rating for Environment, Ethics, Labour and Human Rights, and Sustainable Procurement. We use a common platform, universal scorecard, benchmarks, and performance improvement tools. Our rating is also shared with other stakeholders.

Ongoing Risk Mitigation Measures

GEG endeavours to review our Modern Slavery questionnaire and align it to our improved governance and business processes. Data obtained from the responses to the questionnaires is used to objectively evaluated and identify any Modern Slavery risks. We will continue to collaborate with our suppliers and ascertain any risks and/or issues and mutually agree on resolution activities and timeframes.

Consultation

GEG Board of Directors endorses this Modern Slavery Statement. GEG communicates our Supplier Code of Conduct, Sustainable Procurement and Modern Slavery Statement company wide. We also ensure these documents available for all employees on our intranet and include them part of the employee onboarding process.

Supplier Engagement

GEG has incorporated our Modern Slavery Statement into our “Request for Pricing” and “New Supplier Request” process, to ensure future or potential suppliers are aware of GEG’s expectations in relation to Modern Slavery. As such, we have incorporated the requirements of our Modern Slavery Statement into our “New Supplier Request Form”.

GEG will continue to engage with our suppliers to ensure their focus remains on reducing potential risks within their supply chain and are committed to taking immediate action to address the potential risks.

Looking Forward

To further strengthen our commitment in addressing Modern Slavery risks within our supply chain and operations, we will continue to periodically review and further improve our processes and frameworks. This approach will continue to strengthen our ability to identify, assess and address Modern Slavery risks, and reinforce our due diligence.

We will also review and update our policies, practices, and procedures, as required, to maintain appropriate safeguards against breaches to Modern Slavery and Human Rights legislation within our supply chain and ensure all necessary steps to assess and address Modern Slavery risks in our operations and supply chains, particularly through further engagement with key suppliers.

Throughout FY24/25, GEG will focus closely on the activities below:

- Maintain ongoing engagement with suppliers to minimise and mitigate Modern Slavery risks that may occur within our supply chain.
- Engage with EcoVadis to strengthen our organisation's focus and commitment on Environment, Ethics, Labour and Human Rights and Sustainable Procurement.
- Schedule training and awareness programs for both internal as well as external stakeholders.
- Look beyond our Tier 1 suppliers and extend our supply chain mapping to other geographies beyond Australia.

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