

Brunel



Modern Slavery Statement

2022

Introduction

Brunel Australia Holdings Pty Ltd registered office Level 8, 40 The Esplanade, Perth, WA 6000 and its associated Australian entities including:

- Brunel Energy Pty Ltd
- SES Labour Solutions Pty Ltd t/a Brunel Mining
- SESLS Industrial Pty Ltd
- Brunel Construction and Maintenance Services Pty Ltd
- Brunel Technical Services Pty Ltd

This statement covers (under the endorsement of the same group of Directors without further need for wider consultation) Brunel Australia Holdings Pty Ltd and all its Australian associated entities (Brunel). Brunel's policies and procedures cover all the Australian entities covered under this statement.

Brunel are 100% owned by Brunel Energy Holdings B.V. (Netherlands) who are 100% owned by Brunel International N.V. (Netherlands) listed on the

Amsterdam Euronext exchange. We are an international recruitment and staffing business established over 45 years ago in the Netherlands. We have an established presence in more than 40 countries around the world and primarily service the Renewable Energy, Life Sciences, Oil & Gas, Mining, Infrastructure and Automotive sectors.

Operating locally in Australia since 1997, Brunel Australia Holdings Pty Ltd and its registered entities named above have offices in Perth and Brisbane. Over the past two decades we have placed tens of thousands of individuals into work across Australia. We have achieved this by combining our local knowledge and experience with the strength, systems and reach of Brunel's international network to deliver outstanding results for our clients and the individuals who choose to find work through Brunel.





Our commitment

This statement addresses Brunel's obligations and compliance in relation to the 'Modern Slavery Act 2018 (Cth)' ('the Act') for financial year ending the 31st of December 2021. It highlights the steps we have taken since our last report, and the actions we continue to take, to ensure there is no form of modern slavery occurring within our organisation or our supply chains. In everything we do, we follow our firmly rooted company values: entrepreneurship, integrity, results-driven and passion for people. Maintaining this reputation is essential to Brunel's continued success.

At the group level, we take into account the rights covering the eight fundamental human rights as identified by the International Labour Organisation (ILO) and elaborated in the ILO conventions. Brunel endorses all eight fundamental ILO conventions. Human rights are an integral part of Brunel's culture. Rather than managing human rights as a stand-alone issue, Brunel makes specific reference to comply with them in various Brunel policies, such as the code of conduct, equal opportunity policy, HSE policy, fitness for work, privacy policy and modern slavery policy. These policies are available on our intranet and in our employee handbook.

Brunel acknowledges that it is required to submit its modern slavery statement within 6 months from the end of each reporting period.

“Our core values underpin everything we do at Brunel. Locally we have implemented our own humanocracy charter that further develops on our passion for people - creating an organisation that is amazing as its people. With our core values in mind we fully endorse the introduction of the Australian Modern Slavery Act 2018 (Cth). We are against all forms of slavery across our business and will strive to ensure any risk of it occurring within supply chain is eliminated.”

Tania Sinibaldi
Managing Director Australasia

Our framework

Brunel have a suite of policies and procedures in place which assist us in managing human rights and decreasing the risk of modern slavery occurring within our business or supply chain:

- **'Code of Conduct'** detailing equal opportunity, our commitment to diversity and our intolerance to modern slavery, discrimination, harassment and bullying.
- **'Indigenous Participation & Employment Policy'** stating our commitment to identifying opportunities for the participation and employment of indigenous people and businesses.
- **'Anti-bribery'** and **'Whistleblowing'** global policies including annual refresher training on how to identify bribery, corruption, and illegal activities in our business and/or supply chain and how to raise any concerns via our whistleblowing 'SpeakUp' line.
- **Modern Slavery Policy** which states our commitment to eliminating all forms of slavery in our business and supply chain.

Labour hire licenses

During the 31st of December 2021 reporting period Brunel held labour hire licences in the following jurisdictions: Queensland and Victoria.

The objectives of the Australian labour hire licensing schemes are, broadly, to protect workers from exploitation by labour hire providers and their clients (hosts), to improve the transparency and integrity of the labour hire industry, and to promote responsible practices in the industry. Licence holders are required to meet strict fit & proper personnel and compliance tests as well as regular reporting requirements.

Forced labour / modern slavery

including bonded labour

“ Within the company, applicable labour standards must be observed. Brunel and its business partners will not, under any circumstances, make use of forced labour, child labour, modern slavery or any labour in violation of the ILO conventions. Brunel has addressed this topic in its code of conduct. Brunel is determined to keep developing its approach towards preventing forced labour. ”

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RCSA corporate membership

Brunel as a RCSA Corporate Member are bound by the RCSA Code for Professional Conduct which was authorised by the Australian Competition and Consumer Commission in 2019.

Under the Code, Members are accountable to RCSA for meeting the Code's standards of professional conduct. Specifically, the Code requires Members to adopt values of personal professionalism and operational integrity which, amongst other things, require Members to:

- i. protect work seekers from exploitation (including forms of modern slavery);
- ii. conduct business in a way that avoids causing or contributing to exploitation through their activities;
- iii. seek to prevent or mitigate risks of exploitation that are linked to their operations or services by their business relationships, even if they have not contributed to those risks.

Exploitation is defined in the Code in the following way:

Exploitation, of one person (the victim) by another person, occurs if the other person's conduct causes the victim to enter into any of the following conditions:

- i. slavery, or a condition similar to slavery;
- ii. servitude;
- iii. forced labour;
- iv. forced marriage;
- v. debt bondage.

It also includes serious breaches of the Fair Work Act 2009 (Cth), the Employment Relations Act 2000 (NZ) and unconscionable conduct within the meaning of the common law or the Australian Consumer Law.

As an RCSA Member we are required to meet and are responsible for ensuring that our staff meet the standard of professional conduct required by the RCSA Code.

Risks of modern slavery

We recognise that modern slavery has the potential to exist in our operations and supply chain. Our Australia holdings operations and staff are based in Australia which has a low prevalence of modern slavery (Global Slavery Index 2018) and a strong regulatory environment. Our business employs over 70 direct staff within our operations and an additional ~700 contract hire workforce (at any one time) across white-collar and blue-collar roles in the Oil & Gas, Mining, Engineering, Infrastructure, Life Sciences and Renewable Energy sectors.

In our last reporting period our immediate focus was on what we believed were the most at risk areas of modern slavery occurring within our business and supply chain. This included:

1. Personnel Protective Equipment (PPE) and Garments
2. Cleaning Services
3. Recruitment, Staffing and Labour Hire Supply

We have also identified two new areas in our supply chain for this reporting period we sought additional information from:

4. IT Services companies
5. Travel Management company

1. Under some of our contracts with clients, Brunel are required to supply our workers with PPE. We utilise third party suppliers to supply this PPE. Brunel also purchase merchandise (t-shirts, mugs, branded stationary) as part of our marketing materials. We utilise third party suppliers to supply this merchandise. Clothing is often produced in countries with higher risks of modern slavery occurring. Without the appropriate controls in place we could be either directly linked or contributing to modern slavery practices through the services we receive from our third-party suppliers.

2. We utilise cleaning contractors in the offices that we lease across Australia. We recognise that due to the nature of the manual work, being low-skilled and low-paid there is a higher risk that modern slavery could be occurring in the businesses or the supply chain of the cleaning contractors we have contractual agreements in place with.

3. Brunel directly introduce candidates to our clients. Those candidates selected by our clients are then contracted and paid directly in accordance with the minimum standards set out in the Fair Work Act, Modern Awards or relevant Enterprise Agreements under which the work assignment falls. Brunel do not currently provide staffing solutions to any of the industries identified as high-risk sectors identified in the 'Migrant Workers' Taskforce' report handed down in March 2019. At present our corporate strategy outlines that we will continue to not provide our services to these high-risk sectors. From time to time, where we are unable to source skills from within Australia, Brunel may partner with recruitment firms in countries we do not hold operations or entities within the global group to payroll our workforce placed on assignment in that location.

4. Brunel utilise numerous digital tools and software solutions to execute our services. Over the past year we have implemented a new invoice approval system digitizing our previous paper-based process. Such solutions purchased from suppliers have their own support functions and teams. The IT Solution industry has been known to offshore or outsource work and support to 'delivery centres'. Some of these delivery centres could be located in countries that are at higher risk of forms of modern slavery occurring.

5. As borders have opened up throughout the year we have seen the re-emergence of our clients requiring interstate and overseas travel to delivery on their projects. Brunel partners with a travel management company to help deliver on these logistical requirements. There is a risk in the travel industry that some of the more administrative burdensome tasks could be offshored to locations that do not have the same employment standards as Australia and therefore opening and avenue for modern slavery to exist in our supply chain.

Actions taken to manage modern slavery risks

Since the creation of the Modern Slavery Act 2018 (Cth) Brunel have developed various due diligence systems to help us identify, mitigate, and prevent modern slavery occurring in our business or supply chain. Actions we have put in place and continue to deploy include:

- Development of a supplier questionnaire to help identify areas of modern slavery in Brunel's supply chain
- Issue of the supplier questionnaire to our suppliers identified in our categories of high risk – PPE supplier & cleaning services, recruitment partners, IT Services companies and Travel partner(s).
- Development of a matrix (gap analysis) of where modern slavery risks have been identified in our supply chain i.e. where a supplier does not have a modern slavery policy or statement
- Staff communication on modern slavery utilising our RCSA membership and the resources they have made available including webinar 'Modern Slavery & Vulnerable Worker Protections' within the training portal.
- Design and deployment of a modern slavery training unit titled 'What is Modern Slavery?' that all staff must complete as part of their induction and then refresh annually.
- Our BeBetter at Brunel global lean program developed to finding better digital solutions, developing our humanocracy charter and understanding our markets better.
- Creation of a supplier code of conduct.
- Implement annual reviews amongst senior management to identify any gaps in our Modern Slavery strategy.

Supplier Code of Conduct

Since our last reporting period Brunel has implemented a supplier code of conduct that all its suppliers must agree to prior to being able to supply services to Brunel. Brunel have included our supplier code of conduct as part of this year's statement.

Brunel expects all its suppliers to uphold the same standards as its own and work to the same values we promote of entrepreneurship, integrity, results-driven and passion for people. We are committed to sourcing goods and services in a responsible, fair and sustainable way. In order to establish and maintain a working relationship with Brunel you agree to uphold the following standards:

- Governance and Ethics - compliance with relevant legal and regulatory requirements for all areas of business and operations.
- Modern Slavery - to operate in accordance with the Modern Slavery Act 2018 (Cth) where required and reject all forms of modern slavery.
- Health, Safety & Environment - compliance with all applicable laws and regulations regarding working conditions and environmental laws. Workers are provided with a safe and healthy work environment.
- Harassment, Discrimination & Bullying - neither Brunel's employees nor our suppliers are exposed to any behaviour, sequence of behaviours or discrimination that unfairly offends, humiliates, intimidates, belittles, undermines, scares, excludes or embarrasses anyone it is directed at, or anyone who sees or overhears it.
- Supplier Diversity - Brunel is committed to supporting a culture in which diversity, inclusion and indigenous participation is valued internally and externally. Brunel prefers that suppliers have embedded diversity strategies within their own policies and way of working.
- Privacy Laws - adherence to applicable privacy and data protection laws to prevent unauthorised access, use or leaks.
- Anti-Bribery & Corruption - Brunel takes a zero-tolerance approach to bribery and corruption. We expect all suppliers to act legally, fairly and with integrity.

Senior Management Annual Review

During the reporting period the Brunel senior leadership team met to discuss our current initiatives to address the risks of modern slavery occurring in our business and supply chain and also collaborate on items that we wanted to focus on for the next reporting period based on what we had learnt to date. The results of our meeting were put into our 'looking forward' strategy.

As a corporate citizen

“As a corporate citizen respect fundamental human rights in the employment market and safeguarding ethical behaviour, it extends to cultivating future generation and giving back to society at large.”

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Looking forward

Over the next reporting period, Brunel will continue to assess ways to reduce the risks of modern slavery. The key initiatives we are devoted to include:

- Working with our solution providers to maintain and develop our current training materials building on legislative changes, what our own company can do and enhanced awareness of the different forms of modern slavery including forced labour, deceptive, coercive or intimidating practices amongst our staff group.
- Create and publish changes to Brunel's standard terms of business supplied to clients to require mutual compliance with modern slavery laws.
- Undertake and assess the ongoing assessment of our supply chain through our supplier questionnaire
- Continue to consult with our industry peers on best practice in helping eliminate modern slavery via our RCSA corporate membership.

This Modern Slavery Statement has been approved by the Brunel Australia Holdings Pty Ltd (and associated Australian entities) board of directors on 30 May 2022.



Tania Sinibaldi
Managing Director, Australasia
Brunel