

# Modern Slavery Statement 2024 - 2025

**Altus Group Holdings Pty Ltd**

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Australia

## 1.0 Introduction

Altus Group Holdings Pty Ltd (“Altus Group”) submits this Modern Slavery Statement for the financial year ending 30 June 2025, in accordance with the Modern Slavery Act 2018 (Cth).

This Statement outlines our ongoing commitment to identifying, mitigating, and addressing risks of modern slavery practices within our operations and supply chains. It builds on our FY23-24 progress and introduces strengthened governance, enhanced supplier engagement processes, and the integration of compliance management systems.

This Statement encompasses all controlled entities within Altus Group across Australia and New Zealand.

## 2.0 Commitment

Altus Group continues to evolve its governance and compliance frameworks in line with rapid growth across both countries. As a people and safety-focused organisation, we are committed to ensuring that every aspect of our business upholds respect for human rights and adheres to ethical labour practices.

In FY24 - 25, Altus Group’s commitment has been reinforced through:

- Formalisation of governance via the Corporate and Social Governance Committee.
- Appointment of a General Manager – Impact and Engagement to oversee human rights, ESG, and social governance initiatives.
- Modernisation of our Business Management System to embed modern slavery and ethical conduct principles across all operational levels.
- Expansion of modern slavery initiatives to New Zealand (noting that no equivalent legislation currently applies there); and
- Technology-enabled supplier compliance to enhance transparency and oversight.

## 3.0 Structure, Operations, and Supply Chains

Altus Group operates in all Australian States and Territories (excluding the Northern Territory) and throughout New Zealand, employing over 5,500 people, with approximately 80 offshore administrative support team members based in the Philippines.

Our core services include:

- Temporary traffic management services across multiple sectors, including major infrastructure projects, road, rail, building construction, asset maintenance, utilities and events.
- Traffic management planning, facilitation of works approvals and execution of site traffic management activities.
- Registered training and workforce capability development.

Our supply chain comprises over 750 suppliers, with more than 98% based in Australia or New Zealand.

Major categories include:

- PPE and uniforms.
- Traffic control devices, including signage, traffic cones and bollards.
- Equipment such as portable traffic lights and portable boom barriers.
- Vehicle and plant purchase and hire.
- Software and IT systems.
- Labour hire and professional services; and
- Facilities, maintenance, and telecommunications services.

While our direct exposure to modern slavery risk is considered low, we recognise that elements of broader supply chains, particularly those involving imported PPE, materials and componentry, may carry residual risks.

#### 4.0 Modern Slavery Governance and Risk Oversight

In FY24 - 25, Altus Group enhanced its modern slavery governance through structural and procedural improvements, including:

- *Executive Oversight:* Creation of the Corporate and Social Governance Committee, responsible for overseeing human rights, sustainability, and ethical conduct initiatives.
- *Dedicated Leadership:* Appointment of a General Manager – Impact and Engagement to coordinate all modern slavery, ESG, and community impact initiatives.
- *Integrated Risk Management:* Modern slavery considerations embedded in the Business Management System and risk register, with regular reporting to the Executive Committee and Board.
- *Human Rights Policy Update:* Revised and reissued policy outlining our principles of respect, equality, and ethical conduct, shared with all staff and key suppliers.

#### 5.0 Actions Taken During FY24 - 25

Altus Group has taken the following actions to assess further and address modern slavery risks in our operations and supply chain:

##### 5.1 Supplier Engagement and Controls

- *Updated Supplier Declarations:* All new and existing suppliers are now required to complete updated declarations confirming compliance with the Modern Slavery Act 2018 (Cth) and our internal standards.
- *Supplier Code of Conduct:* Developed and rolled out a comprehensive code outlining expectations around labour rights, ethical behaviour, safety, and environmental responsibility.
- *Mandatory Declarations:* Introduced a compulsory declaration for all suppliers assessed as moderate or high-risk based on geographic or sector exposure.
- *Relationship Formalisation:* Transitioned from informal supplier arrangements to structured agreements embedding compliance obligations.

## 5.2 Technology and System Integration

- *Compliance Management Software:* Implemented a digital platform to collect, monitor, and manage supplier declarations, certifications, and risk data.
- *Future Integration with Accounts Payable:* Design and planning completed for integration to ensure supplier payments are contingent on compliance status.
- *Automated Supplier Onboarding:* Configured to include Modern Slavery Declarations and adherence to the Supplier Code of Conduct as mandatory onboarding steps.

## 5.3 Governance and Policy Development

- *Business Management System Review:* Completed a comprehensive review of policies, procedures, and documentation to align with corporate governance and modern slavery compliance requirements.
- *Human Rights Policy Rollout:* Updated policy distributed to all staff and reinforced during management briefings and induction processes.
- *Executive Oversight:* The Corporate and Social Governance Committee now receives quarterly compliance updates to ensure continuous monitoring.

## 5.4 Awareness, Education, and Communication

- *Modern Slavery Training:* Planning initiated for mandatory training of all management and procurement staff (implementation FY 25 - 26).
- *Internal Communication:* Modern slavery and ethical conduct modules featured in company-wide communications, newsletters, and leadership meetings.
- *Speak Up Program:* Rebranded whistleblower hotline continues to provide a confidential mechanism for reporting suspected unethical or unlawful behaviour, including potential human rights breaches.

## 5.5 Supply Chain Monitoring

- *Supplier Risk Assessments:* Reviewed supply chains for commodities with potential exposure to higher-risk jurisdictions.
- *New Zealand Integration:* Modern slavery principles introduced to supplier management across New Zealand operations to ensure group-wide consistency.
- *Acquisition Integration:* Modern slavery compliance requirements incorporated into due diligence for new acquisitions.

## 6.0 Indirect Links to Modern Slavery Risk

Altus Group recognises that, while the risk of modern slavery within our direct operations and first-tier suppliers remains low, there may be indirect risks further down our supply chains.

Some products and materials we use, such as uniforms, PPE, and traffic control equipment, may originate from regions where labour standards and supply chain oversight are less robust.

These complex global supply chains can make it challenging to identify potential modern slavery risks beyond our immediate suppliers.

To address this, Altus Group has taken a proactive approach to managing indirect risk by:

- Requesting greater transparency from suppliers about where their goods are sourced and manufactured.
- Including modern slavery obligations in supplier contracts and declarations.
- Encouraging suppliers to apply our standards and expectations within their own supply chains.

We acknowledge that eliminating modern slavery requires ongoing collaboration across all levels of the supply chain. Altus Group remains committed to continuous improvement and working closely with our suppliers to enhance visibility and accountability.

## **7.0 Measuring Effectiveness**

Altus Group measures progress using the following indicators:

- Percentage of suppliers with valid Modern Slavery Declarations.
- Compliance rate with the Supplier Code of Conduct.
- Number of suppliers assessed through the compliance platform.
- Percentage of management and procurement personnel trained in modern slavery risk.
- Number and nature of issues raised through the Speak Up program.

Metrics are reported quarterly to the Corporate and Social Governance Committee, with outcomes presented to the Board.

## **8.0 Future Focus Areas (FY25 - 26)**

Altus Group's ongoing actions will focus on:

- *Training Rollout:* Implement formal training for all management and procurement personnel on identifying and mitigating modern slavery risks.
- *Full Software Integration:* Finalise integration between the compliance management platform and the Accounts Payable system for automated verification before supplier payment.
- *Continuous Improvement:* Expand supplier assessments, focusing on high-risk commodities and countries of origin.
- *Cross-Border Standardisation:* Continue applying Australian modern slavery standards across New Zealand operations.

## 9.0 Consultation and Approval

This statement was developed in consultation with:

- Altus Group Executive and Senior Leadership Team.
- Procurement and Supply Chain teams.
- Corporate and Social Governance Committee; and
- Human Resources and Legal departments.

## 10.0 Approval

This Modern Slavery Statement was approved by the Board of Altus Group Holdings Pty Ltd on 10<sup>th</sup> October 2025

Signed:



Ben Marsonet  
Chief Executive Officer and Director  
Altus Group Holdings Pty Ltd  
Date: 10<sup>th</sup> October 2025