

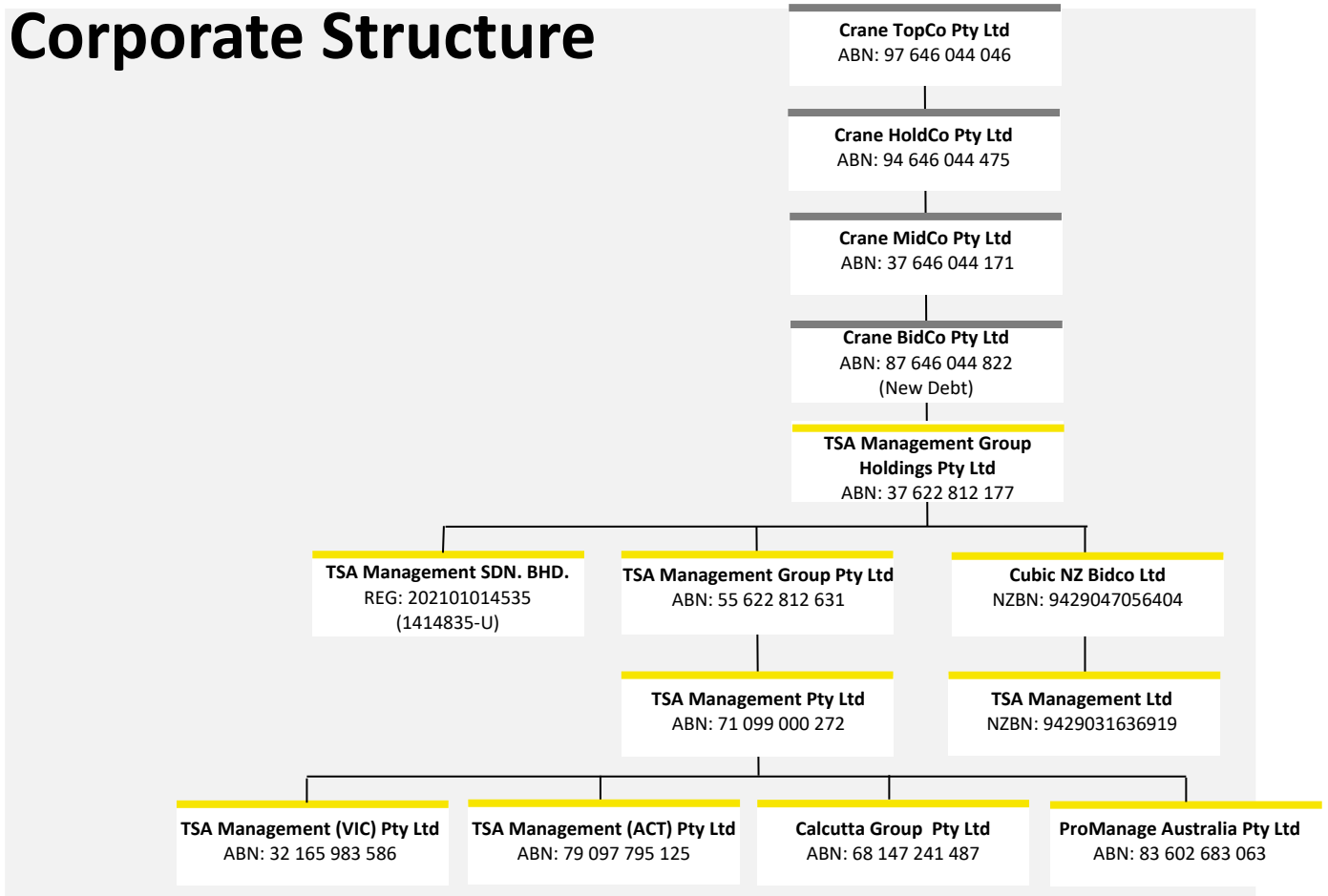


MODERN SLAVERY STATEMENT

FY 2022

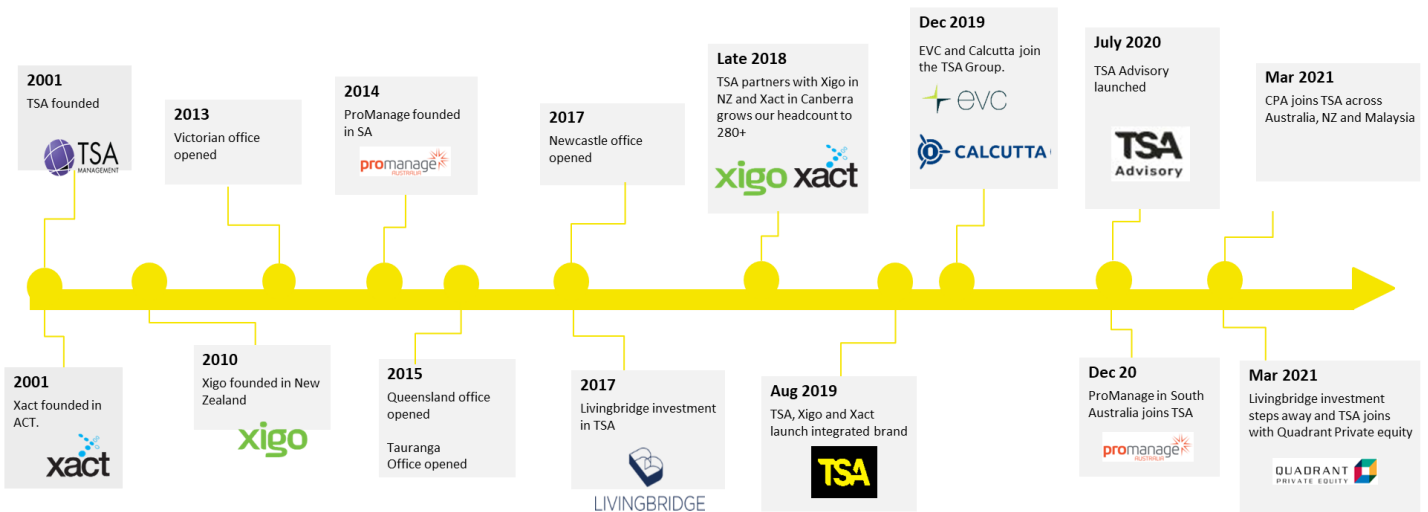
Company detail

This Modern Slavery Statement for the FY22 Financial Year is published in accordance with the Modern Slavery Act 2018 on behalf of TSA Management Group Holdings Pty Ltd (TSA) operating under the ultimate parent company Crane TopCo Pty Ltd and its wholly-owned subsidiaries:



Our history, structure and operations

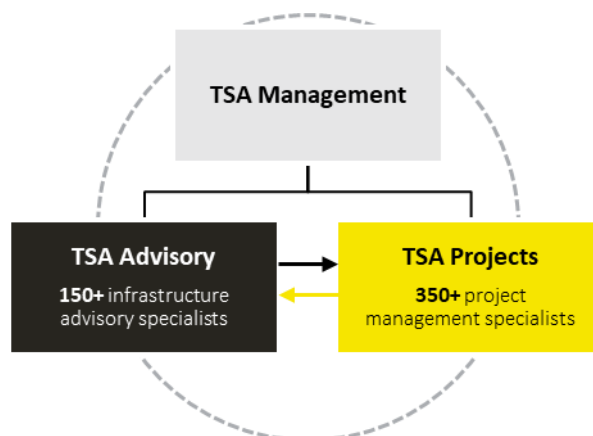
TSA Management (TSA) specialises in providing independent, tailored solutions for complex projects across a range of property and infrastructure sectors for government, private and not-for-profit clients. With experience spanning 20 years, TSA has a proud company record and invaluable depth of industry knowledge.



With over 600 consultants operating from 12 offices, TSA works across the full lifecycle of Asia Pacific's most challenging projects. We offer a unique combination of project management and advisory services across a broad and expanding range of sectors and industries.



Under two distinct but complementary service offerings (TSA Projects and TSA Advisory), our people manage, consult and partner with clients to bring impactful projects to life. The TSA Projects team specialises in project and program management, while TSA Advisory offers advisory services, development and procurement management. TSA is uniquely positioned to draw on any configuration of TSA Projects and TSA Advisory members to form optimal teams for project success.



TSA's project systems, processes and procedures are adaptive to individual client needs and compliant with corporate governance and regulatory requirements. Scalable and flexible, these systems allow TSA's people to work effectively with small businesses, large corporations and government departments across a diversity of projects. TSA is privileged to provide services across a multitude of project types and industry sectors.

Our supply chains/suppliers and modern slavery risk

Given the nature of our business, the TSA supply chains/suppliers are largely focussed on goods and services provided in relation to business operation rather than our service delivery. These include suppliers of IT equipment, photo copiers, office equipment, plants and furniture, stationary and local cleaning (usually part of our lease agreements), travel and catering services. The provision of professional services, insurance and computer software packages in support of our corporate and business operations are provided by Tier 1 firms or global providers. Business-to-business spend on such suppliers amounted to 12.2% of our FY22 consolidated income across some 359 suppliers with payments ranging from \$1 to \$1.5m with an average spend of \$48,000.

The bulk of the TSA operations are based in Australia and New Zealand, with a small office in Malaysia. Consequently, the risk exposure to modern slavery, based on the strong rule of law in these countries, is low. In assessing the risks of existing suppliers and service providers, TSA has adopted a risk-based methodology in its assessment which includes:

- An assessment of the service providers and supplier's on-line presence and policies in respect of Modern Slavery;
- An assessment of the service providers and supplier's registered address and domicile, noting that those with a head office in countries with a strong rule of law represent a lower risk;
- The scale of the service providers and suppliers in terms of number of employees and scale of operations;
- The scale of the spend with service providers and suppliers; and
- The nature of the services and supplies being purchased.

In instances where service providers and suppliers represent a high risk e.g. no published Modern Slavery statement, not an Australian/NZ entity, a small scale business, a high spend by TSA and services provided that include or appear to include migrant workers, then TSA require the acknowledgement of the TSA Modern Slavery policy and an undertaking to comply with it. Failure to do so would raise a red flag and appropriate steps would be taken to disengage with that supplier and potentially to alert the appropriate authorities to investigate further.

Assessments are done as part of an annual business review cycle and based on a historical review of business-to-business supplier spend.

Policies, Processes and Procedures

TSA has in place a range of business policies and approaches which are relevant to the prevention of Modern Slavery and compliance with the Modern Slavery Act 2018. These include:

The TSA Management Modern Slavery Policy – this clarifies the TSA commitment to acting ethically and with integrity in all business dealings and relationships to ensure that its business operations are from involvement in modern slavery.

The **Ethics and Integrity Committee** – this is a sub-committee of the TSA Group Board, involving the Group Chairman and key Executive Directors who are responsible for ensuring that our engagements and interactions are consistent with the agreed values and ethics. The responsibility for compliance with the Modern Slavery Act 2018 requirements sit within the remit of this Committee.

Environment, Social and Governance Framework – TSA has put in place and is further developing an ESG Framework within which Modern Slavery falls. This is aligned to the Global Reporting Initiative (GRI). The ESG Framework also led to the development of the Ethics & Integrity Committee under which the Modern Slavery compliance is managed.

In addition, TSA has included as part of its annual mandatory compliance training/refreshers courses for all staff, a module on Modern Slavery. This ensures business-wide awareness of this important issue.

Effectiveness, Engagement and Annual Statement

The Ethics and Integrity Committee has the responsibility for assessing the effectiveness of the measures put in place via a six-monthly audit of suppliers used by TSA. In addition, it engages with the Regional General Managers across the key geographies to ensure that there is alignment on supplier engagement and Modern Slavery compliance checking. Any issues found are then dealt with by the Committee and raised to Group Board level for any escalation required, via the appropriate channels.

The Ethics and Integrity Committee is responsible for the drafting and publication of the annual Modern Slavery Statement, which is endorsed by the Chief Executive Officer.

This Statement was approved by the Board of Directors of TSA Management Pty Ltd on the 23 December 2022.



Andrew Wilson
Chief Executive Officer and Director

Date: 23 December 2022