

BG&E Group of Companies MODERN SLAVERY ACT STATEMENT 2025

BG&E opposes exploitative practises that violate an individual's dignity and human rights in all forms.

REPORTING ENTITY AND STRUCTURE

This statement is provided in satisfaction of the requirements of section 54 of the *Modern Slavery Act 2015* (UK) and section 13 of the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**).

BG&E Group Limited (ACN 650 895 426) (the reporting entity) is a public unlisted company headquartered in Sydney, Australia and employs approximately 800 staff, operating from offices in Australia, the Middle East, New Zealand, Singapore, the Philippines and the United Kingdom.

BG&E's services are delivered by BG&E Pty Ltd, BG&E Facade Consultants Pty Limited, BG&E Minerals Pty Limited, BG&E Consulting Ltd (NZ), BG&E Consulting Engineers Pte Ltd (Singapore), BG&E Consulting Engineers Ltd (UK), and BG&E International Consulting Engineers LLC SPC (Abu Dhabi).

On 31 October 2025, Systra SA with an Executive Board and a Supervisory Board (Paris Trade register under number 387 949 530 (**Systra**)) became the ultimate parent company of BG&E Group.

In this statement, unless expressly mentioned otherwise, references to 'BG&E', 'BG&E Group', 'the Company', 'we', 'us' and 'our', refer to BG&E Group Limited and its operating entities.

PURPOSE AND ACKNOWLEDGMENTS

The purpose of this statement is to detail the steps BG&E has taken to assess the effectiveness of its actions in addressing modern slavery risks in its operations and supply chains for the period from 1 July 2024 to 30 June 2025 (**Reporting Period**). The term 'modern slavery' as used in this statement refers to the definition in the Modern Slavery Act which includes slavery, servitude, debt bondage, human trafficking and forced labour.

BG&E reinstates its acknowledgment regarding its responsibilities in safeguarding human rights through ethical and sustainable business practices in accordance with the United Nations Guiding Principles on Business and Human Rights and applicable local laws and continues in its commitment in:

- acting ethically with integrity and transparency in all business dealings; and
- maintaining effective systems and controls in place to minimise the risks of any form of modern slavery taking place within the business or our supply chains.

OUR BUSINESS

BG&E is united by a common purpose – 'we believe that truly great engineering takes curiosity, bravery and trust, and is the key to creating extraordinary built environments.'

We proudly foster working environments that reject bribery, corruption and unlawful acts, and celebrate inclusiveness and difference, and encourage innovation and creativity.

Our expertise

BG&E works with clients to deliver projects for the built environment. BG&E's clients generally fall within the property, transport, ports and marine, water, resources, renewables and defence sectors and include but are not limited to contractors; developers; architects; planners; project financiers; and owners and government agencies.

We focus on the technical aspects of engineering to provide our clients with solutions that are practical and efficient and that incorporate our experience in constructability and innovation.

OUR SUPPLY CHAINS AND MODERN SLAVERY RISK

BG&E considers that the risk of modern slavery occurring in its operations is relatively low given our ambit of professional services is limited to design consulting / engineering, albeit that BG&E's business is in the construction industry. Our supply chain consists mostly of professional service providers who are engaged as subconsultants to BG&E, along with suppliers of services and equipment to our office. BG&E also recognises that the risk of modern slavery has the potential to exist in its global operations, including:

- across its network of global supply chains, including:
 - the recruitment of engineering professionals and support staff;
 - our subconsultants including architects, engineering and geotechnical consultants, planners, surveyors, digital service providers and other professional advisors;
 - suppliers of products and services to our corporate operations, including insurance, legal and financial advisors, software and technology providers, stationery and materials, catering services and ridesharing;
 - other companies or branches within the BG&E Group globally, including drafting design offices and administrative services in the Philippines;
 - the engagement of its subconsultants and subcontractors more generally across the world, including newly emerging economies; and
 - product suppliers and materials predominantly in the disciplines including facades, materials and timber.

More particularly, BG&E acknowledges that there may be risks of modern slavery within our supply chain arising primarily from:

- utilising services or delivering projects in countries with newly emerging economies; and
- matters outside the control of BG&E, such as the failure of our other entities in our supply chain to comply with ethical and responsible business practices.

RISK MANAGEMENT AND DUE DILIGENCE

Governance Framework

BG&E recognises that good corporate governance is crucial to the long-term success of the BG&E Group and

has established a governance and risk management framework to oversee the financial and strategic decisions, assess the management of risks, including modern slavery. This framework includes:

- The BG&E Board of Directors (**Board**)
- Executive Leadership Team (**ELT**)
- Safety, Quality & Risk Management Committee (**SQRC**) and Risk Management Group (**RMG**)
- Corporate Services Group (**CSG**)
- Environmental, Social & Governance Committee (**ESG**)
- Policies and procedures that govern ethical conduct expectations at BG&E, as well as risk management of potential modern slavery risks
- Training on ethical conduct and supply chain risks, including modern slavery

The Board, ELT, SQRC, ESG and the RMG all operate under charters that require compliance with ethical behaviour and the overseeing of potential modern slavery risks within BG&E's operations.

The SQRC meets quarterly and is responsible for the oversight of BG&E's response to human rights, including the impact on BG&E's business, and provides advice and guidance to the Board on those matters. The SQRC along with the ELT are primarily responsible for BG&E's procedural response to its modern slavery obligations.

The ESG meets monthly and provides input to the social and governance aspects of BG&E's business operations, including ethical practices and potential impacts of modern slavery.

BG&E's CSG is comprised of highly skilled professional advisers that have experience across global supply chains and operations in risk management, corporate governance and ethical conduct and corruption. They support the monitoring, management and reporting of possible modern slavery risks within BG&E's operations.

Policies, procedures and training

BG&E has established and implemented several internal policies and procedures, including annual employee training, to ensure that we are addressing the potential risks of modern slavery within our supply chain and conducting business in an ethical and transparent manner. These policies and procedures outline BG&E's commitment to act ethically and include:

- **Anti-bribery and corruption policy and practices.** These procedures make it clear that BG&E does not tolerate any form of bribery or corruption in its work practices. Employees are required to comply with strict protocols when it comes to dealing with government officials across its operations.
- **Recruitment policy and practices.** We adhere to a robust recruitment policy, including conducting eligibility to work checks for all employees to safeguard against human trafficking or individuals forced to work against their will. Recruitment is typically conducted through registered labour agencies for the provision of professional staff.
- **Staff Employment Guide.** All employees can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. Our whistleblower policy has a dedicated hotline to raise anonymous complaints about unethical conduct.
- **Code of Business Conduct.** This code explains the way we behave as an organisation and how we expect our employees and suppliers to act, including identification of possible modern slavery risks.

- Our employees are required to undertake our code of business conduct training annually.
- **Grievance and Dispute Resolution** policies allow concerns to be raised, identified, and addressed through a fair and confidential process.
 - **Subconsultant Management Procedure.** This procedure describes the process on how we identify, appoint and manage our supply chain partners, and includes ensuring suppliers like subconsultants and other service providers comply with modern slavery laws.

OUR PERFORMANCE AND FUTURE INITIATIVES

Performance during the Reporting Period

BG&E is constantly improving its modern slavery practices and assessing its modern slavery risks, inclusive of our supply chain. BG&E has continued to pursue the following initiatives:

- Assessing potential clients and suppliers for modern slavery risks prior to appointment.
- Expanding the BG&E's Subcontractor Questionnaire to include questions which are more expansive in scope to further investigate modern slavery risks sufficient. This Subcontractor Questionnaire forms part of the ongoing wider procurement review of the engagement of subcontractors, which will mandate increased reporting of supply chain compliance by its subcontractors to ensure modern slavery objectives are being met.
- Entering into transparent and formal contracts with suppliers which contain modern slavery obligations which must be cascaded down through supply chains.
- Providing appropriate compliance training to its staff on modern slavery obligations through its Safetrac program.
- Monitoring compliance with its modern slavery obligations within its business through its internal systems, processes, and reporting requirements.
- Continuing to measure, monitor and address any reports from whistle blowers, relating to breaches of modern slavery obligations. No notifiable incidents were reported concerning modern slavery during the Reporting Period.

FUTURE COMMITMENTS

In the next reporting period, BG&E will endeavour to:

- Continue to monitor the external environments and supply chain risk generally across its operations, particularly in the disciplines of facades, materials and timber.
- If required, update its policies, procedures and contract terms to accommodate and respond to any changes in legislative requirements.
- Maintain its annual employee training on ethical conduct and supply chain risk.
- Complete its review of its subcontractor management procurement and update its processes accordingly.

CONTACTS

Please contact David Farah, Chair of the SQRC or Adam Scott, General Counsel, details provided below:

David Farah - david.farah@bgeeng.com

Adam Scott – adam.scott@bgeeng.com

APPROVAL FOR THIS STATEMENT

This statement was approved by the Board of Directors on 2 December 2025.



Paul Farrugia

Director



Frank Cerra

Director