

Modern Slavery Statement

1 January 2023 to 31 December 2023



We're redefining exceptional

Through our specialist expertise, we're challenging boundaries to deliver advanced infrastructure solutions.

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Reporting entity

This modern slavery statement (**Statement**) has been published in accordance with the *Modern Slavery Act 2018 (Cth)* (**MAS or Act**) and is a joint statement made on behalf of the reporting entities:

Surbana Jurong (Holdings) Australia Pty Ltd;

SMEC Holdings Pty Ltd;

SMEC Australia Pty Ltd; and

SMEC International Pty Ltd

together “**SMEC**”, each with a registered address of Level 7, 40 Mount Street, North Sydney NSW 2060 Australia.

This Statement describes the risks of modern slavery in SMEC’s operations and supply chains and outlines the actions taken to address those risks for the financial year ending 31 December 2023.

This is the fourth Statement for Surbana Jurong (Holdings), SMEC Australia and SMEC International. It is the third Statement for SMEC Holdings Pty Ltd.

Approval

This Statement is made in accordance with s.14 of the Modern Slavery Act (Cth) for the financial year ended 31 December 2023 and approved by the board of directors of

Surbana Jurong (Holdings) Australia Pty Ltd



Hari Poologasundram
Director

Our structure, operations, and supply chain

"SMEC conducts its business in a manner consistent with internationally proclaimed human rights, including all workers' fundamental right to be treated with dignity and respect, and live a life of freedom and opportunity."

Organisational structure

Surbana Jurong (Holdings) is a wholly owned subsidiary of Surbana Jurong Private Limited, a Singaporean consultancy company.

Surbana Jurong (Holdings) and SMEC Holdings derive their revenue from holding investments in its subsidiaries (SMEC Australia, SMEC International and Robert Bird Group). It shares its offices with the registered offices of SMEC Australia and SMEC International.

SMEC Australia delivers its services across Australia and New Zealand, whilst SMEC International oversees the delivery of SMEC's services internationally through entities that it controls or by way of branch, representative or project offices. Please refer to Appendix A for a list of entities owned or controlled by SMEC.

SMEC employs over 5400 people in 35 countries and across approximately 70 offices (21 offices located in Australia and New Zealand, with the remainder located in foreign jurisdictions). Over 90% of SMEC employees are permanent employees with the remaining small percentage being employed on either a casual basis or fixed-term contract.

What we do

We provide high quality advisory and consulting expertise across the project lifecycle, from initial concept, feasibility, planning and design through to construction, commissioning, and operation and maintenance.

Infrastructure

We are specialists in delivering advanced engineering solutions for transport and energy infrastructure projects. SMEC is also recognised globally for technical and service excellence across the full spectrum of infrastructure sectors, including waste, water, resources and environment.

Urban

With expertise in civil, structural and building services engineering design, we provide solutions for residential, commercial, industrial, healthcare and hospitality building projects around the world. Our experience extends from low density urban land developments, through to high-density, high-rise projects for public and private sector clients.

Managed Services

Our integrated management services extend to facilities, development, project and asset management, as well as social, governance and advisory services. Combining detailed advisory with innovative technologies, we keep projects on schedule, reduce technical risks, meet budget requirements and ensure compliance with relevant regulations, quality standards, construction permits and insurance guidelines.

Our supply chain

Our supply chain remains substantially similar to the previous reporting period.

Our supply chain consists of goods and services that support our consulting business. It can be broadly split into two categories:

Project services

The engagement of consultants and contractors to provide sub-consultancy services which support SMEC in the provision of its consulting and advisory services to its clients.

Hire of equipment (if necessary) in order to perform its services.

Corporate services

The purchase or hire /leasing of goods and services for the day-to-day running of SMEC's business and its offices, including:



Rental of office space



Facilities, including cleaning, maintenance and security



Office and other equipment (purchase and hire)



ICT equipment



Advertising, marketing, sponsorships



Professional services, including memberships, recruitment and training



Travel, accommodation and hospitality



Personal protective equipment

SMEC has direct suppliers in approximately 70 countries, each of the countries in which it operates as well as suppliers in other jurisdictions. For SMEC Australia, however, the majority of its first tier suppliers remain located in Australia and New Zealand.

Some countries have been recognized by the *Global Slavery Index 2023* as having a higher perceived risk of modern slavery.



Our due diligence during the reporting period has identified that some or part of our corporate services goods are manufactured or sourced from overseas, including from countries that have a higher perceived risk of modern slavery.

Identifying and taking action to address our risks of modern slavery

Modern slavery risk management framework

In order to continue to effectively identify, assess and address our risks of modern slavery within our operations and supply chains, SMEC has a modern slavery risk management framework, based on the following approach:



1. Design and implement a modern slavery management framework
2. Risk assessment and conduct due diligence on the modern slavery risks
3. Adopt strategies to address risks identified
4. Develop and implement appropriate remediation measures
5. Monitor and review effectiveness of the risk management framework
6. Establish appropriate mechanisms for internal and external reporting

Identification of modern slavery risks in our operations and supply chain

SMEC's assessment of its high-risk suppliers remains substantially like the previous reporting period.

SMEC's operations and supply chain are categorized by the type of goods or services provided assessed against the geography in which such goods or services are provided. Consideration is also given to vulnerable populations and/or organizations with business models structured around high-risk practices.

Our operations

We provide engineering, advisory, and consulting services, which generally have a lower perceived risk of modern slavery. We do not directly produce, manufacture, or provide services or goods which are identified as high-risk.

Most of our employees are permanent staff with only a small percentage of individuals being employed on a casual basis or from a labour hire service. All employees have employment terms and conditions set out in an employment contract, with regular performance reviews and interactions with management.

Despite operating in high-risk jurisdictions, given the core services that we provide and the nature of our workforce, the risk of modern slavery occurring within our operations is generally low.

Our supply chain

As previously noted, our supply chain is generally split into two categories:

project services; and
corporate services.

Project services



Outsourcing administrative functions



Purchase/hire of ICT equipment



Marketing and merchandise

As identified in our previous Statement, the risk of modern slavery within our project services category remains low.

For SMEC International, the salient risk may also be present in

Corporate services

As identified in the Statement, salient risks of modern slavery may be found in



Office equipment suppliers;



Facilities Management



Accommodation, such as hotels

Cleaning

Maintenance services

Security

of its offices



Personal protective equipment purchased for its employees in the undertaking of its services outside of the office.

Facilities Management

The general maintenance and cleaning of SMEC's offices are procured either directly by SMEC or indirectly through the building's property managers. This continued with the current reporting period with any new engagement subject to existing due diligence processes through our existing and effective supplier registration process.

Previous reporting periods have included assessments undertaken focusing on direct engagement by SMEC. Future risk-based assessment planning will be determined within the next reporting period.

Suppliers of personal protective equipment and marketing merchandise

Our spending on personal protective equipment (**PPE**, including high visibility vests and jackets) is relatively low. However, we identified that although our first-tier suppliers are based in Australia, the raw products (such as cotton) and/or the manufacture of such products may come from countries with a higher perceived risk of modern slavery.

SMEC has previously reported centralizing the supply of PPE and SMEC-branded merchandise in Australia by a dedicated supplier, which has supported our commitments to ethical, responsible, and sustainable conduct. SMEC acknowledges procuring PPE from other suppliers, with suppliers subject to the existing SMEC supplier registration processes.

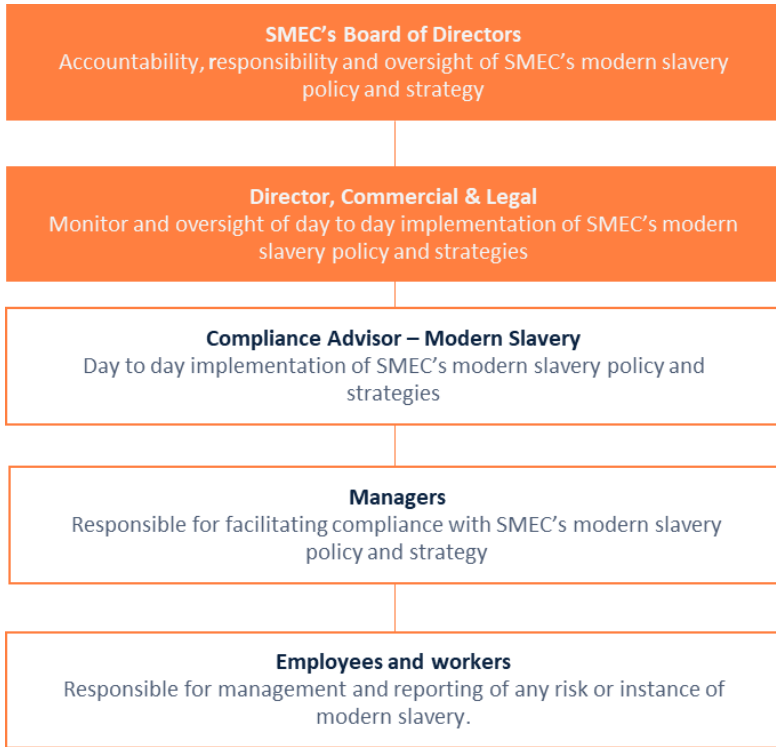
SMEC will continue to enhance due diligence processes, inclusive of addressing modern slavery risk with a review and update of the registration process to include modern slavery risk assessment in supplier pre-qualification to obtain an advanced understanding of potential supplier's supply chains.

Outsourcing of administrative functions

In previous statements, SMEC reported outsourcing some of its administrative functions including accounting, client and supplier onboarding processes to a supplier located in the Philippines. These administration functions are performed by permanent employees, not subject to any third-party hire agreements, and are subject to and protected by the same recruitment and People and Culture processes afforded to all SMEC employees.

Governance and training

Governance



SMEC’s board of directors has ultimate responsibility and accountability for managing the modern slavery risks. They are supported by other functions in the business with a responsibility on all our employees to manage and report risk or instances of modern slavery.

Policies

One of our core values is integrity. We act responsibly and conduct ethical business with accountability and transparency. SMEC has a suite of policies and procedures which articulate our values and expectations in relation to the identification, prevention, and mitigation of modern slavery risks and human rights abuses.



Code of conduct	Establishes a common understanding of the standards of behavior expected of all SMEC employees and is applicable to the suppliers/third parties it engages
Modern Slavery Policy	Sets out SMEC’s commitment to addressing risks of modern slavery within its operations and supply chain.
Child Protection Policy	Provide guiding principles in instances where SMEC’s services bring employees in contact with children.
Business Integrity Policy	Outlines a range of requirements that are designed to reinforce the standards of behavior to combat risks of fraud, bribery, corruption, and other illegal, dishonest, unfair, or unethical practices.
Whistleblowing Procedure	Sets out the associated protections for whistleblowers
Corporate Social Responsibility Policy	Ensures that SMEC is a good corporate citizen and that employees adopt corporate social considerations in their day-to-day work
Suppliers Code of Conduct	Sets out ethical, social, and environmental standards of conduct expected from our suppliers
Procurement policy	Sets out SMEC’s approach to procurement of goods and services
Purchasing Procedure	Sets out how SMEC manages the procurement of goods and services

Grievance mechanism

Investigation Officer / Disclosure Officer	Complainant	Subject Expert, Other Business Units, Suppliers	Senior Management	Third Party
1. Receive the grievance / allegation.	✓			
2. Acknowledge receipt to the complainant. Continue communication with complainant throughout investigation	✓			
3. Does the grievance / allegation meet the scope of the mechanism				
a. If yes, inform the complainant of the next steps	✓			
b. If no, inform the complainant of the outcome and reason for rejection	✓			
Consider providing additional support to help the complainant meet information requirements, or refer to another appropriate mechanism for raising this grievance / allegation, if applicable (either internally or externally)	✓			✓
4. Follow Internal Escalation Protocol attached at Schedule 1 to notify senior management of allegation and next steps			✓	
5. Evaluate and investigate grievance / allegation.				
- Consider SMEC's degree of involvement [see Schedule 2] and apply following steps as applicable and / or consider supplier's investigation procedure		✓	✓	
- Engage with relevant internal teams as applicable (such as those responsible for procurement, human resources, legal.				
- Engage external experts if applicable (such as NGO's, community groups, local government, and / or unions				
- Engage with suppliers				
6. Develop resolution in collaboration with the complainant / victim	✓		✓	✓
7. Complainant / victim and SMEC formally agree upon resolution (if complainant / victim does not accept resolution go to recourse or appeal using management and / or a third party)	✓			
8. Implement resolution	✓	✓		
9. Monitor implementation of agreed remedy and measure the effectiveness of the remedy (or seek updates from suppliers where suppliers have implemented the resolution)				
10. Close grievance and notify senior management of the outcome			✓	
11. Integrate feedback and learnings from the process into the grievance mechanism and modern slavery risk management practices within SMEC.		✓	✓	

SMEC supports and encourages everyone to ask questions and raise concerns of suspected reportable conduct. It utilises a third party-hosted reporting platform which allows employees and suppliers to raise confidential grievances. SMEC has also allocated a specific email address for those who prefer to provide reports by email.

SpeakUP SMEC

 Indicates possible engagement
  Indicates engagement

Adapted from: *Implementing Effective Modern Slavery Grievance Mechanisms – A guidance Note for Business*. Global Compact Network Australia. March 2021 pg 22

Training

A key aspect to ensuring that our employees can identify, report and help prevent modern slavery is building awareness through training.

SMEC's bespoke tailored online training module (created during the previous reporting period) represents how modern slavery may arise within SMEC's operations or supply chain. It uses examples more representative of the services that SMEC provides and builds upon what red flags to look out for when identifying possible modern slavery. The training includes 10 questions designed to test the knowledge of our employees and includes clear guidance on how to issue reports of suspected modern slavery.

SMEC's training module forms part of SMEC's compulsory onboarding modules for new employees. The mandatory training was issued companywide during the reporting period and will be issued again to all employees every two years thereafter.

Online Training Results

- Issued to **4249** employees
- Completed by **3888** employees
- **91.5%** completion rate



Consultation

SMEC has a process of consultation throughout the reporting period with quarterly progress updates to SMEC's executive committee and board. In preparing this Statement, consultation across each reporting entity and / or entities owned or controlled by a reporting entity has been conducted through the compliance and legal teams and boards of directors.

Assessing the effectiveness of our actions

Monitoring and reviewing the effectiveness of our actions is embedded in our risk management framework and is key to our continued improvement.

SMEC has identified three focus areas to measure the effectiveness of our actions:

Measuring Awareness

As part of a planned transformation, SMEC's modern slavery training will serve as the foundation for the training to be provided across the entire Group and will continue to remain mandatory for all new employees as part of the induction and onboarding process.

Measuring improvements to policies and procedures

SMEC continues to participate in the **United Nations Global Compact Network Australia - Modern Slavery Community of Practice** (optimizing stream). This has been beneficial in keeping up to date with developments in

human rights and modern slavery legislation and topics within Australia and more broadly. It has also provided an opportunity to understand the processes and systems of peers from the wider community to be used as a comparison or guiding tool for improvements to our policies and procedures.

Supplier due diligence

We acknowledge the importance of a robust due diligence program and recognise, that improvements to the associated process for the issue of due diligence questionnaires can be strengthened to increase supplier engagement and reduce administration. A current uplift of the due diligence program is underway during the 2024 reporting period.

Our values

Our core values represent what we stand for, what we expect from employees, what we deliver to our clients, and how we aim to conduct our daily work. We are committed to leading by example and continuing to build a values-led global culture.

People

We act responsibly and conduct our business with the highest ethical standards, accountability and transparency.

Professionalism

We value our global and diverse talent by creating a safe, inclusive and supportive environment where our people can thrive.

Integrity

We act in the best interests of our clients and deliver innovative solutions with high standards of excellence.

Purpose

We build trusted and enduring relationships with clients, partners and colleagues to achieve win-win outcomes.

Partnership

We are passionate and committed to making meaningful impacts on our communities and environment.

Compliance

We believe that integrity is our collective responsibility. We are committed to supporting honesty, transparency and compliance through our organisational culture, systems and operational environment.

Appendix A

Owned or controlled entities

Surbana Jurong Holdings (Australia) Pty Ltd owns and controls: SMEC Holdings Pty Ltd and Robert Bird Group Pty Ltd¹.

SMEC Holdings Pty Ltd owns or controls:

SMEC Australia Pty Ltd, SMEC International Pty Ltd², SMEC Services Pty Ltd, and SMEC Foundation Ltd.

SMEC Australia Pty Ltd owns or controls: Global Maintenance Consulting Pty Ltd. and SMEC New Zealand Ltd.

SMEC International Pty Ltd

- controls:

In North & South East Asia: ECCL Singapore Pte. Ltd., SMEC Asia Ltd., SMEC International (Malaysia) Sdn. Bhd., SMEC (Malaysia) Sdn Bhd, SMEC Macau Engineering Consultancy Limited, SMEC Myanmar Company Limited, SMEC Philippines Inc, SMEC PNG Ltd, SMEC Vietnam JSC, and Global Maintenance Consulting Singapore Pte. Ltd.

In Africa: SMEC International (Africa) Pty Ltd, SMEC (Kenya) Limited, SMEC Nigeria Limited, SMEC South Africa Pty Ltd, SMEC (Tanzania) Limited, SMEC Uganda Limited, Soillab Pty Ltd, VKE Namibia Consulting Engineers Pty Ltd, VKE Botswana Pty Ltd, and Vincpro Properties (Pty) Ltd

In South Asia Central Asia: ACE Consultants Ltd, SMEC Oil & Gas (Pvt) Ltd, Engineering General Consultants (EGC) Ltd, SMEC Rail India Pvt Ltd, Ocyana Consultants Pvt Ltd, SMEC Central Asia LLP, SMEC Georgia LLC, SMEC Tashkent LLC, SMEC India PVT Ltd, SMEC Rail India Pvt Ltd, SMEC (Bangladesh) Limited, SMEC Pakistan Ltd and South Asia Middle East Management Company LLC.

In the Americas: SMEC Servicios de Ingenieria de Mexico, and SMEC Chile Limitada

Other: Frontier Energy Ltd and Frontier Hydro Limited

- has investments in, but does not control:

PT SMEC Denka Indonesia, Himalayan Green Energy Private Limited, LDLC Properties (Pty Ltd), Soilco Materials Investigations (Proprietary) Limited, VKE Infrastructure Services (Pty) Limited, and TT Energy Private Ltd

¹ Robert Bird Group Pty Ltd is not covered by this Statement and publishes a separate statement as a reporting entity on behalf of it and the entities it owns or controls. Please refer to RBG's Statement for further details.

Appendix B

Mandatory Criteria	Page
Identify the reporting entity	3,
Describe the structure, operations, and supply chains of the reporting entity	4 -6
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	7-12
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	7-12
Describe how the reporting entity assesses the effectiveness of such actions	13
Describe the process of consultation on the development of the statement	13
Other information that the reporting entity considers relevant	4, 15



Member of the Surbana Jurong Group

We're redefining exceptional

Through our specialist expertise, we're challenging boundaries to deliver advanced infrastructure solutions.

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