

Seed Dreaming

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A member of  
**Bouygues Construction**

# Modern Slavery & Human Trafficking Statement

**VSL AUSTRALIA PTY LTD**  
**FOR THE YEAR ENDED 31 DECEMBER 2024**

**ABN 56 000 528 914**



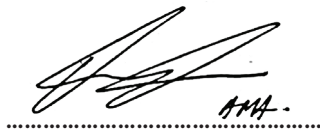
## 1. Identification of Reporting Entity and Purpose

This statement (the Statement) is made on behalf of VSL Australia Pty Ltd of Suite 2, Level 2, 6 Eden Park Drive, Macquarie Park, NSW 2113 in respect of its business operations in Australia (VSL) pursuant to section 13 of the Modern Slavery Act 2018 (Cth) (the Act).

VSL takes its obligations in relation to the identification, prevention and reporting of modern slavery and human trafficking seriously. It is working hard to identify and reduce the risk of modern slavery or human trafficking in its supply chains or in any part of its business and aims to have a zero-tolerance approach to modern slavery. Its Modern Slavery Policy reflects its commitment to acting ethically and with integrity in all its business relationships. VSL adheres to a worldwide group Code of Ethics personally supported by Martin Bouygues, Chairman of Bouygues SA, and pursuant to this undertakes to comply with the strictest legal and moral standards in the conduct of its operations.

The Statement sets out what VSL has done in the financial year ending 31 December 2024 to work towards ensuring that slavery and human trafficking is not taking place in any part of its businesses or supply chains.

This statement was approved by the Board of VSL Australia Pty Ltd and is signed by Andrew Manser in his role as the managing director of VSL Australia Pty Ltd.



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Andrew Manser  
Managing Director of VSL Australia Pty Ltd 16th June 2025





## **2. VSL's structure, business and supply chain**

VSL is a private limited company and a specialist provider of design and construction services in the field of structural systems, repairs and preservation and ground engineering. VSL is incorporated in Australia and has its headquarters in Macquarie Park, NSW. It has around 197 direct employees in Australia.

VSL has 4 Main business lines, these are: Technologies, Repairs and Strengthening, Civil Works and Ground Engineering.

Examples of projects undertaken or in progress include:

- Technologies: Austrack Intermodal Terminal - construction of Heavy Duty Post Tensioned Concrete Slabs, VIC
- Repairs and Strengthening: D&C of Errant and Hostile Vehicle Mitigation Treatments for the Southwest Metro Project - Bridge Strengthening and Bearing Replacement Stacey Street, Sydney, NSW
- Civil Works: Fremantle Bridges Alliance - Post Tensioning and Cable Stay, North Fremantle WA
- Ground Engineering: Suburban Rail Loop WPC Package - Diaphragm Wall, Piling and Ground Improvement Works, Melbourne VIC

VSL is part of a group of companies worldwide which have Bouygues SA, listed on the Paris Euronext, as their ultimate parent and operates as part of the Bouygues Construction division of the group. VSL's parent company within the Bouygues Construction division is VSL International headquartered in Switzerland. The Bouygues group has over 200,000 employees worldwide and operates in nearly 80 countries.

VSL has established a leadership committee which meets regularly to ensure proper governance and review performance of the business. During the 2023 financial year, as part of implementation measures to address its responsibilities under the Act, VSL planned a Modern Slavery working group which was established in early 2024 to monitor modern slavery risk and implement modern slavery measures.

As a specialist design and construction contractor, VSL has a limited supply chain model that supports its core businesses and maintains its office and technology infrastructure. VSL heavily self-delivers its goods and services (including via intra-group supply) and therefore external supply chains are relatively limited. VSL's supply chains, either externally or from other companies within the Bouygues group, relate mainly to the following activities:

- Manufacture & Fabrication – self-delivery of composite materials and equipment via multiple Bouygues (VSL) group manufacturing hubs in Europe and South Asia;



- Purchasing of Goods & Materials – VSL purchases goods and materials to support delivery of its services. VSL also has an equipment hub in Hong Kong that manufactures and ships specialist items to Australia.
- Travel – mobility of people is essential to VSL’s core business and VSL works with a service provider which manages its transportation and accommodation bookings.
- Consultancy – professional and consultancy services from design professionals in various fields, including, without limitation, engineering (such as structural, system, civil, geological and geotechnical, sustainability and surveying;
- Labour Supply – the supply of temporary labour for construction projects;
- Subcontracting – the appointment of specialist contractors necessary to deliver certain construction operations on VSL construction sites;
- Business services – a range of products and services necessary to maintain normal day to day operations in its corporate and site offices such as cleaning, catering, security;
- Professional services – professional services such as external training, audit services and advisory services in areas such as tax, insurance and law;
- Technology – the systems, software and equipment that are necessary to maintain the technology infrastructure that supports VSL’s core business; and
- Property – the leasing of office space to accommodate staff, leasing of a plant yard to store equipment and site facilities to operate its projects.

### 3. Risk of modern slavery in VSL’s supply chain

VSL considers it unlikely that it would directly cause modern slavery practices but realises that it could inadvertently contribute to them. Risks have been identified in the following areas of VSL’s supply chain:

- The engagement of labour through labour hire companies for the execution of VSL’s projects. VSL is aware that the labour hire industry has been highlighted as a high- risk industry for potential exploitation of migrant workers;
- The procurement of materials, equipment and specialist machinery from overseas supplier factories. Some of these companies, such as those manufacturing components, are in countries reported (by international organisations and NGOs) to have a high prevalence of modern slavery e.g. China.
- The procurement of staff uniforms and PPE for site workers. VSL is aware that the textiles and clothing sector is a high-risk sector.



## **4. Actions taken by VSL to address modern slavery risks**

### **4.1 Policies in relation to modern slavery and human trafficking**

VSL applies a number of policies and procedures which are relevant to preventing instances of modern slavery from occurring in its business or its supply chains, supported by a dedicated Australian based Ethics and Compliance team, as well as a Compliance Team at the group company in France, to whom breaches of any of the following policies can be notified. In particular, the following corporate requirements are directly relevant to the subject matter of this Statement:

- Modern Slavery Policy – this VSL policy specifically addresses the subject matter of the Act recognising and preventing trafficked, forced, bonded and child labour;
- Human Rights Policy – this new policy, formalised this year, consolidates the Bouygues Group long-standing commitment to respecting human rights across all our entities and global operations. It sets a common core of principles, guiding the employees' actions wherever we operate;
- Code of Ethics – this Bouygues Group code requires employees to comply with the principles of the United Nations Universal Declarations of Human Rights, the fundamental conventions of the International Labour Organisation, in particular, concerning forced child labour and the principles of the United Nations Global Compact. The Code was last updated in 2022. It is mandatory for VSL's subcontractors and suppliers to act in a manner consistent with the Code;
- CSR Charter for Suppliers and Subcontractors – this charter sets out the standards the Bouygues Group including VSL expects from its supply chain in several areas, including compliance with labour standards. It is mandatory for VSL's subcontractors and suppliers to comply with the Charter;
- Health & Safety policy – this policy sets out VSL's commitment and approach to ensuring it provides a healthy, safe working environment for its own staff, labour and contractors that work on-site.
- Harassment & Bullying policy – this policy sets out VSL's approach to preventing the occurrence of discrimination, harassment, bullying or victimisation in the work place;
- Whistleblowing Policy – this policy encourages employees, subcontractors and suppliers to bring any bad practice they become aware of to the attention of an 'Eligible Recipient' under Australian Whistleblowing legislation without fear of repercussions for doing so. In addition, the Bouygues Construction group has a global whistleblowing platform that enables whistleblowing of issues outside of Australian law;
- Commitment and Control Procedures – these procedures set out VSL's internal control and governance procedures including with regard to approving financial transactions and signing contracts with suppliers.



These policies are available where appropriate on the Bouygues Group website, on VSL's SharePoint and internal management systems, accessible to all employees.

## **4.2 Due diligence processes**

VSL and its suppliers are expected to live up to and adhere to the corporate Code of Ethics and CSR Charter which reflect UN Guiding Principles 15 and 17 and demonstrate progress towards the standards set out in it.

VSL's direct procurement practices require that all new subcontractors and suppliers are subject to an appropriate level of screening. The scope of screening and evaluation VSL performs depends on the nature of the goods or services being procured but can include compliance screening, financial checks, data security assessments, reference checks, obtaining copies of relevant documents and/or site inspections. Subcontractors and suppliers proposed for a project from high-risk countries are screened under a Bouygues Group programme known as 'Scrutiny'. This allows elimination of subcontractors and suppliers which do not adhere with VSL's compliance framework. If a risk is identified, VSL also has the opportunity through Bouygues Group procedures to arrange a physical inspection of supplier sites overseas before deciding whether to enter into a business relationship.

Prospective members of the supply chain may be asked questions on skills, education and employment, equality, diversity and inclusion, as well as on industrial relations and whether they allow their workforce to join trade unions.

Labour hire is focused through a limited number of labour agencies. Pursuant to their contractual obligations, the labour agencies are required to conduct all the applicable 'right to work' checks and ensure that all legislation applicable to the workers are complied with.

Further, VSL's site teams hold regular meetings with their subcontractors and consultants during which labour standards, health and safety and performance issues are discussed. VSL's staff also conduct assessments of the supply chain, which involve evaluating criteria including environment, quality, resources, safety and sub-supply chain. Intrinsically this includes the well-being of their staff. This allows VSL to regularly monitor the performance of its supply chain. The evaluation of the supply chain partner including the aforementioned criteria is made on an ongoing basis and is considered in deciding whether to engage these supply chain partners for future projects. VSL's business review meetings with members of its supply chain are another way in which performance is assessed and their compliance with VSL's corporate requirements such as the Modern Slavery and Health and Safety policies is also reviewed at these meetings.

## **4.3 Risk assessment, management and remediation**

Section 3 above sets out the areas of VSL's procurement activity where there could be a higher risk of slavery or human trafficking taking place. VSL has in place the following measures to help manage this risk.



VSL has access to a procurement team for each major project that assesses and manages the procurement of high value and/or high-risk goods and services in accordance with VSL's procurement practices and formal tendering procedures.

VSL has access to our parent company's legal team based locally in Australia, including a dedicated Australian based Ethics and Compliance team, as well as a Compliance Team at the group company in France, to whom breaches of any of the corporate policies can be notified.

VSL also has in place appropriate processes for reporting concerns within the business, including the whistleblowing procedure.

#### **4.4 Training in relation to slavery and human trafficking**

VSL has provided slavery and human trafficking awareness training for key individuals in its business (executive leadership team and key figures from the procurement and HR department).

VSL's Managing Director has communicated a copy of the Modern Slavery policy to the business, which is also available on VSL's management system and SharePoint.

### **5. Evaluating VSL's effectiveness**

VSL considers that it is a responsible employer and contractor and that it is introducing proportionately effective processes for identification and management of the risk of modern slavery on its sites and in its supply chain.

Nevertheless, VSL recognises that some areas of its operations, in particular areas of the supply chain, are exposed to parts of the industry that could be considered higher risk. VSL recognises that in order to further mitigate the risk of modern slavery some further development of risk assessments and mapping of its supply chain could be beneficial.

VSL is committed to developing its supply chain due diligence and working with its supply chain partners to foster best practice.

VSL is also committed to developing its policies and processes to ensure that any occasion of modern slavery or human trafficking is identified and resolved in the best interests of the victim. VSL will continue to assess the effectiveness of its actions during the next reporting period, including by:

- Implementing our Bouygues Group Human Rights policy;
- Implementing training and awareness; and
- Holistically with its wider corporate group considering risk areas or trends in any anti-slavery cases reported including through grievance or whistleblowing reporting mechanisms.