

2023

Thiess Group Modern Slavery Statement

Respecting *human rights*



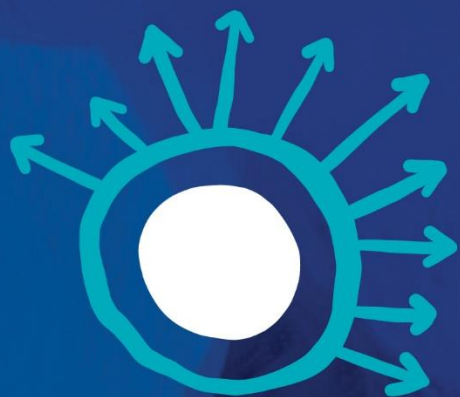
THIESS GROUP

THIESS



FLEETco





Acknowledgement of Country

The Thiess Group acknowledges and respects the history and contributions of Indigenous peoples in all countries and regions where we operate. At our workplaces across the world, we recognise our responsibility to live and work on country, and with communities, respectfully and with care.

We honour and respect Aboriginal and Torres Strait Islander peoples as having the longest continuous culture on earth and recognise them as the Traditional Owners and Custodians of this land.

About this statement

The Thiess Group supports the recognition of human rights. The UN Guiding Principles on Business and Human Rights, the UN Global Compact, the UN Sustainable Development Goals, and the International Labour Organisation's standards are examples of key international principles and standards that inform our approach to evolving our business in managing the risk of modern slavery in our operations and supply chain and improving environmental, social and governance outcomes. In 2023, the Thiess Group became a member of the UN Global Compact Network Australia, in support of the 10 Principles on human rights, labour, environment, and anti-corruption.

This is the Group's third Modern Slavery Statement as a standalone business since introducing Elliott Advisors (UK) Ltd (Elliott Advisors) as a shareholder alongside the CIMIC Group. Prior to this, the Group reported through our former 100% parent CIMIC Group Ltd (CIMIC). Our 2023 Modern Slavery Statement can be read in conjunction with our reporting suite and key resources which are available at [thiess.com](https://www.thiess.com).

In this statement all references to 'Thiess Group', 'the Group', 'we', 'us' and 'our' refer collectively to all the reporting entities (listed in Appendix A) and their owned and controlled entities. References to Thiess include all entities listed in Appendix A excluding RTL and MACA entities.

Thiess Group Holdings Pty Ltd
ABN 34 646 054 757

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Statement development and approval

The Thiess Group Modern Slavery Statement for the period 1 January 2023 to 31 December 2023 has been prepared as a joint statement on behalf of and in consultation and collaboration with the reporting entities (listed in Appendix A) and is made pursuant to sections 14 and 16 of the *Modern Slavery Act 2018*.

Preparation of this Modern Slavery Statement has been managed by the Thiess Modern Slavery Working Group, integrating team members from the people, procurement, legal, compliance, safety, sustainability, and communications functions. Consultation occurs between members of the working group and their counterparts in our regional operations and operational reporting entities, with a collaborative approach taken to implement and verify the year's modern slavery activities, confirm reporting requirements, and collate data for this statement.

Integration processes

The integration of MACA (a contracting group based in Western Australia, providing mining, construction and mineral processing services to the metals, minerals and infrastructure sectors which was acquired by Thiess Group in October 2022) into the Thiess Group commenced in late 2022 and continued throughout 2023. This integration process includes aligning policies and procedures, including in the area of modern slavery.

The transition to aligning RTL Joint Venture policies and procedures with Thiess Group was completed in 2023. (Thiess Group acquired a majority share in the RTL Joint Venture ("RTL"), a contract mining civil construction and transport business based in Victoria in the latter half of 2020).

Relevant data from MACA and RTL has been included in this statement where the data has been collected.

This statement has been reviewed and approved by the Board of Thiess Group Holdings Pty Ltd, and the Executive Chair and Chief Executive Officer of Thiess Group Holdings Pty Ltd.



Executive Chair & CEO message

As a global company operating in seven countries with over 15,000 employees, the Thiess Group has an important role to play in addressing and preventing modern slavery.

Our workforce is diverse, speaking multiple languages and celebrating many cultures – however we are bonded through our shared values of *Discover*, *Accountable*, *Respectful* and *Empowered*. These values drive our commitment to responsible, sustainable mining – and having our operations and supply chain free from modern slavery is fundamental to this commitment.

Mitigations to address modern slavery in 2023

Our [Modern Slavery Policy](#), alongside our Modern Slavery Working Group, provide guidance on how the Thiess Group assess and address modern slavery risks. We leverage our strong governance, compliance, and people frameworks to ensure we apply a disciplined approach across our operations.

In 2023, we took steps to enhance our capabilities to identify, mitigate and prevent modern slavery across our global operations and supply chain.

We continued to participate in the Minerals Council of Australia (MCA) Towards Sustainable Mining (TSM) Taskforce, and in 2023 completed a gap analysis against the TSM Child and Forced Labour Protocol. In 2024 we will continue to collaborate with and support the MCA in developing a service provider pathway for *Towards Sustainable Mining*.

The Thiess Group is committed to an ongoing program of Human Rights Impact Assessments (HRIA) across our regions, with preparations for a second HRIA in Indonesia commencing in 2024. We are also pleased to see that actions arising from the HRIA undertaken in India in 2022 were completed this year. This statement details the actions undertaken during 2023 to identify and address modern slavery risks within our business.

Looking ahead

As we mark our 90th year and continue our journey to place the Thiess Group at the forefront of sustainable mining, driving and maintaining conversations around human rights throughout our business and supply chains remains a key focus for our global operations.

After finalising the transition of RTL to Thiess Group policies and procedures in 2023, in 2024 we will continue this transition for MACA, and any newly acquired businesses where appropriate.

I am pleased to present the 2023 Thiess Group Modern Slavery Statement and I look forward to continuing to share our progress.

Michael Wright
Executive Chair & CEO

This statement is signed by Michael Wright as Executive Chair and Chief Executive Officer of Thiess Group Holdings Pty Ltd on 27 June 2024.

A handwritten signature in blue ink, appearing to read 'Michael Wright', with a long horizontal line extending to the right.

Michael Wright
Executive Chair and Chief Executive Officer
Thiess Group Holdings Pty Ltd

1. Mining services leader

Our business

The Thiess Group is a leading mining, civil and services provider, operating across Australia, Asia and the Americas with over 14,500 employees. Our companies operate in the mining, infrastructure and resources sectors, connecting clients across geographies, commodities and cultures to deliver bespoke and sustainable solutions. Our core capabilities extend across engineering, asset management, extraction and haulage, civil and infrastructure, crushing and processing, and rehabilitation.

Since being founded by the entrepreneurial Thiess brothers in 1934, Thiess has deftly adapted as changing markets and environments presented new challenges and opportunities.

Driven by this pioneering spirit, the Thiess Group has seized the opportunity to play a role in the global ambition of transitioning to net zero carbon emissions, launching our strategy to transform into a leading provider of sustainable, diversified services.

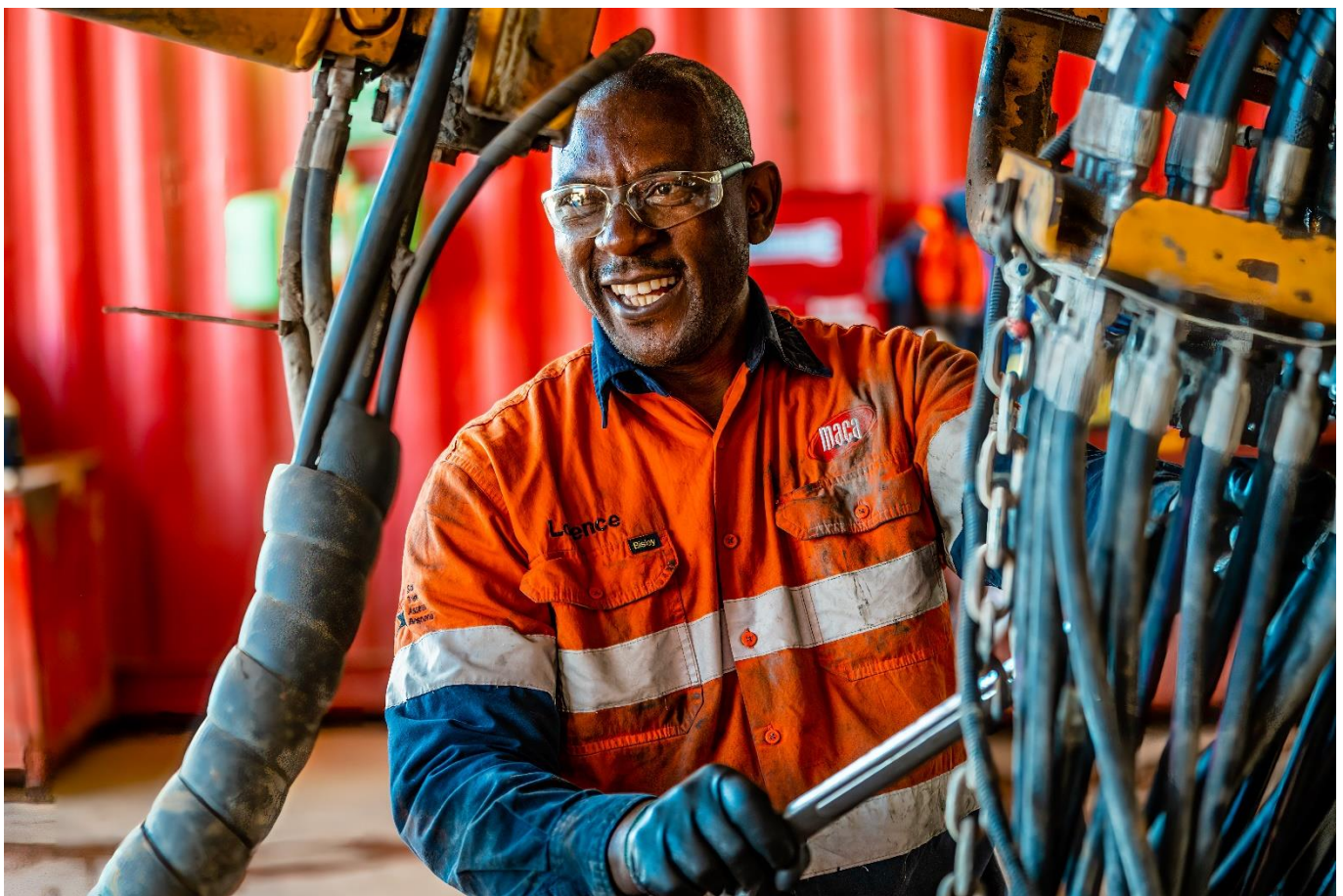
Throughout 2024 we will continue to invest in our people, supporting their development and unlocking new opportunities to upskill and retrain.



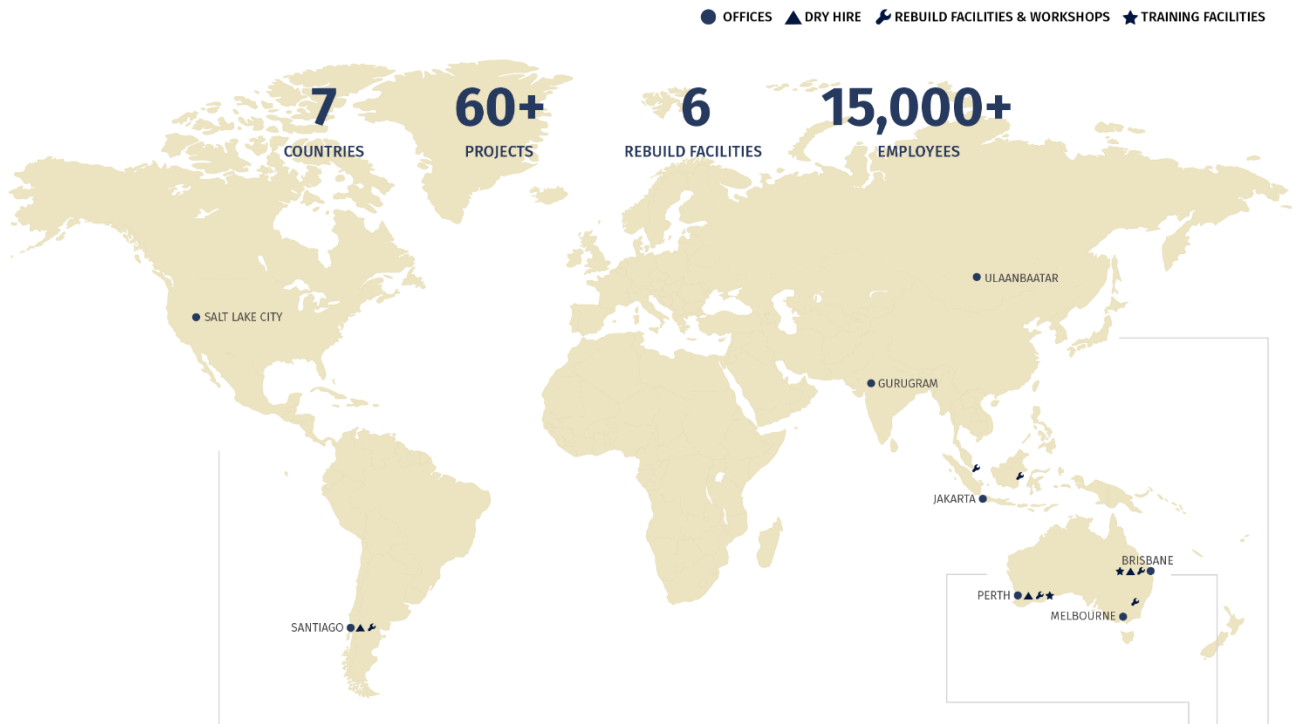
2. Our operations and supply chain

In 2023, we delivered specific work packages and life-of-project operations for our clients – from developing greenfield projects through to mine closure and rehabilitation. Throughout delivery, our teams draw on our extensive engineering expertise, technology and proven systems to fast-track problem solving, with rigorous cost and schedule control. This is amplified by our ability to rapidly mobilise people, equipment, and support services within and across international borders.

We engage with local communities, including Indigenous and First Nations peoples, to support our understanding of local modern slavery risks and the potential impact of our operations. As a services provider in our sector, we work with our clients to understand their social impact assessment and support their social impact management plans.



2.1 Operations and services



THIESS GROUP



REVENUE BY OPERATING REGION



● Australia East (45%) ● Asia (22%)
● Australia West (30%) ● Americas (3%)

REVENUE BY COMMODITY



● METALS & MINERALS (27%) ● METALLURGICAL COAL (28%) ● THERMAL COAL (33%)
● REHABILITATION (1%) ● OTHER* (11%)

AMERICAS

● 3 METALS & MINERALS

ASIA

● 4 METALS & MINERALS
● 1 METALLURGICAL COAL
● 5 THERMAL COAL

AUSTRALIA WEST

● 15 METALS & MINERALS
● 19 OTHER*

AUSTRALIA EAST

● 1 METALS & MINERALS
● 5 METALLURGICAL COAL
● 4 THERMAL COAL
● 2 REHABILITATION
● 5 OTHER*



Thiess delivers sustainable solutions in open cut and underground mining in Australia, Indonesia, Mongolia and North and South America. Established in 1934 Thiess operates across diverse commodities, geologies, environments and cultures.

The Thiess India Hub provides technical support to Thiess' operations, including geotechnical and business process automation services, from our office in Gurugram, India.



Launched in 2022, Thiess Rehabilitation offers services in progressive mine rehabilitation, mine closure including infrastructure removal, and solutions for abandoned mines and contaminated land requirements.



Acquired in late 2022, MACA is a contracting group providing services to the mining, infrastructure and construction sector industries, headquartered in Perth, Western Australia. Founded in 2002 as Mining and Civil Australia, the company has grown from a specialised mining and civil contracting business to a large Australian and international contracting partner of choice.

Work to integrate MACA and Thiess businesses and align policies and procedures commenced in late 2022, and continued during 2023.



FleetCo was established in 2013 and provides comprehensive plant hire, maintenance and equipment ownership packages, and innovative capital replacement solutions. FleetCo provides equipment hire services in Australia, Chile and Indonesia.



RTL Mining and Earthworks Pty Ltd (RTL) provides mining, civil construction, heavy earthmoving plant hire services as well as general transport services in the Latrobe Valley, Victoria and surrounding regions in Australia. Since August 2020, Thiess increased its shareholding in RTL from 44% to 88%, with the remaining 12% shareholding held by Linfox Resources Pty Ltd.

For more information on the companies that make up the Thiess Group, please see thiess.com/ourcompanies

2.2 Supply chain

In 2023, Thiess Group worked with more than 7,000 direct domestic and international suppliers with key areas of spend including:

- mining equipment
- tyres
- diesel fuel and lubricants
- explosives
- specialist skilled subcontractors such as diesel fitters, auto electricians, fire suppression, air conditioning and refrigeration, and other tradespeople
- labour hire such as operators and trades
- catering and camp services
- professional services such as technical, financial, management and training
- technology and telecommunications
- civil and infrastructure works.

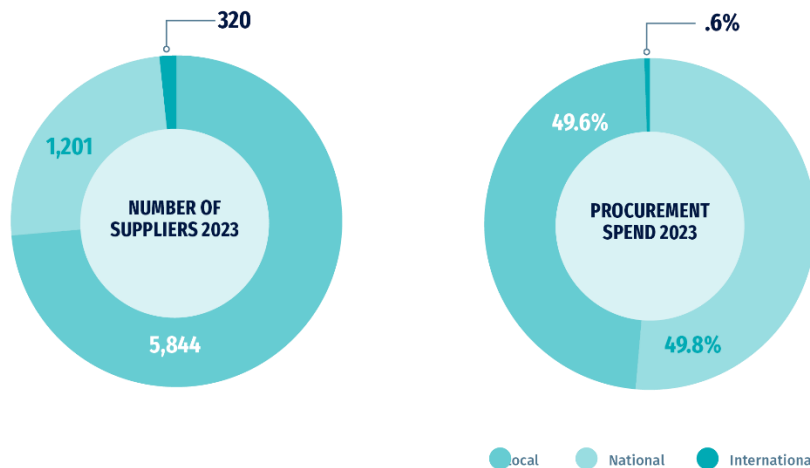
Thiess Group takes a local procurement approach that allows us to have a better relationship with, and understanding of, our suppliers. It is our practice to source goods and services from businesses that operate within the countries where we operate. Where we identify opportunities for strategic global relationships, we prefer to establish global frameworks that facilitate local sourcing.

The goods and services we procure are those typically used in the mining, asset management and corporate sectors, with finished goods forming the bulk of goods purchased. Raw materials sourced directly from the manufacturer make up a small part of our purchases, with even fewer procured outside of the country in which we are operating. We generally do not manufacture our own products.

We procure services providing corporate support such as facilities and maintenance, accounting, legal and IT services, and professional consulting services such as design and engineering, all of which complement our own internal resources for either short or long-term engagements as required.

Group suppliers and spend

Thiess Group’s global operations are often located in remote or isolated environments. We take a balanced and consistent approach to procurement with a strong focus on local supplier participation.



3. Understanding our modern slavery risks

We recognise that in delivering mining, construction and mineral processing services, both in Australia and internationally, we operate in some geographies, sectors and supply chains that may have an elevated exposure to the risk of modern slavery. This demands a high degree of vigilance in meeting our obligations.

Our understanding of the drivers, vulnerable groups and the hidden but pervasive presence of modern slavery, and our approach to addressing it, has been informed by the UN Guiding Principles on Business and Human Rights, the UN Global Compact, the UN Sustainable Development goals and the International Labour Organisation's standards. Our insight has also been facilitated by the Global Slavery Index (GSI) published by Walk Free, as well as our ongoing program of Human Rights Impact Assessments (HRIA), which commenced in 2017, and on-going supply chain risk assessments.

Modern slavery risks can be present in the resources sector due to the nature and location of operations and the complexity of supply chains. Common modern slavery practices in the resources industry include human trafficking, the worst forms of child labour, forced or unpaid work and bonded labour.

Given the diversity and breadth of Thiess Group's geographies and markets, we monitor for a wide range of risks that have the potential to materially impact our operations, people, reputation, the environment and communities in which we work, and the financial prospects of the Group.

3.1 Operations risk

Complementing the Thiess Group's governance and due diligence processes (see *Section 4. Assessing and addressing the risks of modern slavery*), we use HRIAs to extend our identification and understanding of human rights and modern slavery risks in our operations.

Our HRIA practice has been refined over several years. We have prioritised identifying and addressing modern slavery risks in geographies where we have a significant workforce, and in geographies where an elevated risk has been identified based on the relevant GSI and our internal assessment of our operations and supply chains.

To date we have undertaken HRIAs in our operations in Indonesia (undertaken in 2018 – prevalence rank¹ of 6.7), Mongolia (undertaken in 2021 – prevalence rank of 4) and India (undertaken in 2022 – prevalence rank of 8). More detail about our HRIA program is set out in section 4.1.7.

3.2 Supply chain risk

Informed by sources that include the GSI country/sector risk ratings identified by the third-party screening tool we use and other industry insights, we consider that the risk of modern slavery in Thiess Group's supply chain is consistent with the industries and jurisdictions within which we operate. While we procure goods and services globally, a highly skilled workforce and locally sourced goods mitigate some of this risk, presenting a lower overall risk of modern slavery.

The Thiess Group does from time-to-time source certain low skilled services and imported goods that have a higher risk of modern slavery, for example in the production of garments, apparel, and personal protective equipment (PPE); the supply of raw materials, electronic products and steel fabrication; and the provision of certain services including labour hire, cleaning, freight and logistics.

We remain committed to reducing the risk of purchasing 'at risk' goods and services and inadvertently contributing to modern slavery. We do this in part through our due diligence processes which include supplier screening and using a suite of template commercial contracts with secondary supplier controls. These processes are detailed in section 4.

1. Prevalence Rank estimates the prevalence of modern slavery per 1000 people of population - from the Walk Free Global Slavery Index 2023.

4. Assessing and addressing the risks of modern slavery

4.1 Our integrated approach

To assess and address modern slavery risks, the Thiess Group leverages its governance, compliance, procurement and people frameworks, to ensure we apply a consistent and disciplined approach across our operations.

These tested and integrated frameworks provide a range of cohesive levers for consulting and aligning our businesses, managing risk, assessing performance and engaging our people and suppliers – including an open, confidential and responsive grievance and reporting mechanism.

Our approach, due diligence and assurance are facilitated by collaboration between specialist functions in all Thiess Group companies, including people, procurement, risk, legal, compliance, internal audit, sustainability and communications.

To enhance our ability to identify, mitigate, and prevent the risk of modern slavery, and respond to any impacts should they occur, we work through a cycle of action, investigation, evaluation and critical analysis, and remediation.

From this we use evidence-based assessments of our practices and new initiatives to inform our planning and continual improvement steps.

We continue to review and where appropriate adapt our policies, established under CIMIC Group ownership, to suit the needs of Thiess since introducing Elliott Advisors as an additional shareholder alongside the CIMIC Group at the end of December 2020.



	Group alignment	Risk and performance management	Engagement, monitoring and continuous improvement
GOVERNANCE	<ul style="list-style-type: none"> Principles Code of Conduct¹ Board Committees and Management Committees Policies and procedures 	<ul style="list-style-type: none"> Risk management framework Management systems Board Committee Charters Thiess Governance System RTL Document Management System (DMS) (RTL) 	<ul style="list-style-type: none"> Audit & Risk Committee (Board Committee) Safety, Sustainability and Compliance Committee (Board Committee) Health, Safety and Environment Committee (Management Committee) Reportable Conduct Group (Management Committee) Business Conduct Representative Modern Slavery Working Group Diversity and Inclusion Working Group
COMPLIANCE	<ul style="list-style-type: none"> Policies relevant to modern slavery issues, such as: <ul style="list-style-type: none"> Code of Conduct¹ Modern Slavery Policy Modern Slavery Standard Risk Policy³ Dealing with Third Parties Policy Procurement Policy Sustainability Policy Whistleblower Policy Anti-Bribery and Corruption Policy Gift and Hospitality Policy¹ Healthy, Safe and Respectful Workplace Policy Group Respectful Workplace Standard¹ Group Complaints and Investigations Standard¹ Governance Policy¹ⁱ Compliance Policy² Modern Slavery Working Group 	<ul style="list-style-type: none"> Compliance Plan Modern Slavery Plan Annual/ad hoc compliance assurance audit Annual Compliance audit Internal audit activities Internal audit Board Audit and Risk Committee Board Sustainability, Safety and Compliance Committee reporting and review 	<ul style="list-style-type: none"> Grievance and reporting mechanism: <ul style="list-style-type: none"> Group Complaints and Investigation Standard² Business Conduct Representatives and Reportable Conduct Group Independent Ethics Line Management and CEO Quarterly Compliance Certificates

	Group alignment	Risk and performance management	Engagement, monitoring and continuous improvement
PROCUREMENT	<ul style="list-style-type: none"> • Dealing with Third Parties Policy • Procurement Policy • Levels of Authority 	<ul style="list-style-type: none"> • Supplier chain identification and management of risks relating to modern slavery by processes such as: <ul style="list-style-type: none"> – Supplier registration – Supplier screening tool and onboarding flowchart – Third Party Anti-Bribery, Corruption and Business Integrity Declaration – Supplier pre-qualification questionnaires – Template commercial contracts – Procurement Policy internal audits – Supply and Services Contract Management Guideline (includes Supplier Onboarding Flowchart) – Third party screening tool guideline 	<ul style="list-style-type: none"> • Supplier access to grievance and reporting mechanism, including the independent Ethics line
PEOPLE	<ul style="list-style-type: none"> • People policies including <ul style="list-style-type: none"> – Recruitment Policy, procedures and management systems – Healthy, Safe and respectful Workplace Policy – Diversity and Social Inclusion Policy – Flexible Working Policy – Parental Leave Policy – Family and Domestic Violence Policy – Redundancy Policy – Group Complaints and Investigation Standard² 	<ul style="list-style-type: none"> • Human Rights Impact Assessments • People policies internal audit 	<ul style="list-style-type: none"> • Education and training <ul style="list-style-type: none"> – Leadership and culture – Code of Conduct training – Compliance training – Modern slavery training – Equal employment opportunity, antibullying, harassment and discrimination training • Reporting and grievance frameworks • Respectful Workplace Taskforce • Complaints investigation procedures

1. Updated in 2023 2. Introduced in 2023 3. Updated in 2024

4.1.1 Governance and leadership

In 2023, the Thiess Group introduced a new set of values to guide us into the future, replacing our Principles. Our new values and behaviours, developed in consultation with our people, set expectations for our clients and for each other.

Thiess Values:

Discover – *Always striving to be better and do better*

Accountable – *Committed to our promise of performance*

Respectful – *Thriving through honesty and encouragement*

Empowered – *Driving change through new ways of working*

These Values are the foundation of our governance framework and guide all of our activities. They also form the basis of our [Group Code of Conduct](#) which sets the standard of behaviour we expect from all our employees, sub-contractors and partners.

Where the Code of Conduct or a policy sets higher standards of behaviour than local laws, rules, customs or norms, the higher standards apply.

Our Code of Conduct rejects all forms of modern slavery including, but not limited to, the trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage and deceptive recruiting for labour and services. We do not tolerate unlawful child labour or any form of exploitation of children or young people and commit to complying with the International Labour Organisation (ILO) with respect to under-age workers.

Whilst ultimate accountability rests with the Board, our governance framework delegates the management thereof to the Board's Safety, Sustainability and Compliance Committee (SSCC) and senior management, under the leadership of the Chief Executive Officer.

The SSCC assists the Board in fulfilling its corporate governance and oversight responsibilities, and compliance with all applicable legal and regulatory requirements and internal policies. The SSCC monitors and reviews compliance and performance in the areas of health and safety, diversity and social inclusion, human rights including modern slavery, the environment, sustainability, and business conduct.

We have a comprehensive series of policies, procedures, frameworks and guidelines relating to corporate governance, ethics, and financial and risk management in place across our operations to provide overall operating parameters for our entities.

Managing risk is a critical element of Thiess Group's overall business strategy and has been a key contributor to our success. Our risk management framework is tailored to our business, embedded largely within existing processes and aligned to our short and long-term objectives. We conduct quarterly enterprise level risk workshops/discussions, consisting of a broad cross section of leadership, facilitated by our Group Manager Risk, Governance & Assurance. These workshops/discussions provide an opportunity for a review and update of the risks that may materially impact our strategic, operational, financial and sustainability performance objectives.

The revised Risk Register is then issued to the Executive for consultation and review, with feedback incorporated before the register is finalised and presented to the Audit and Risk Committee (ARC). Every ARC meeting has a standing agenda item to consider the Risk Register, which provides a regular opportunity for Directors to understand and discuss the register. It also informs the scope of internal audits and assessments undertaken by the Internal Audit team annually.

Our Risk Policy aims to ensure:

- the safety and welfare of our people and the communities and environments in which we work, in accordance with our Healthy, Safe and Respectful Workplace Policy, Environment, Sustainability and Business Resilience Policies and other relevant Group policies
- that risks and opportunities are identified, managed and updated regularly, using a consistent methodology which is embedded into our processes in a systematic way to inform our strategic decision-making, and
- compliance with legal, regulatory and certification requirements.

Our tendering governance framework and associated tools, including country risk assessments, support our risk assessment processes (which includes consideration of modern slavery risks) in relation to our tendering activities.

4.1.2 Compliance

Our framework for compliance, due diligence and internal audit is set out in our Compliance Policy and Compliance Plan, which was introduced in 2021. The Compliance Plan framework is made up of the policies, procedures and controls we have in place to mitigate the risk of breaches in our compliance obligations, including those set out in our Code of Conduct, Anti-Bribery & Corruption Policy, Dealing with Third Parties Policy, Group Procurement Policy, Health & Safety Policy, Workplace Behaviour Policy and Whistleblower Policy.

The Modern Slavery Policy commits the Thiess Group to assessing and addressing the risks of modern slavery, sets out accountabilities, and describes the internal control systems and reporting process that are to apply.

A range of activities facilitate modern slavery due diligence across the Thiess Group, including:

- The 2023 Modern Slavery Plan, an annual document which details the actions of the Thiess Group to assess and address the risk of modern slavery in our operations and supply chain, and supports the Modern Slavery Policy and the Thiess Group Code of Conduct.
- Regular meetings of the Modern Slavery Working Group, comprised of functional leads from the people, procurement, legal, compliance and communication teams. The Working Group's objectives are to identify modern slavery risks and mitigations for our operations and supply chains, share ideas for continuous improvement, integrate appropriate controls within existing business processes and support preparation of this statement.
- Participation in the CIMIC Group Modern Slavery Committee meetings, which facilitate the sharing of ideas for continuous improvement.
- The conduct of an annual review assessing our compliance with the use of the third-party screening tool, including reviewing activities addressing modern slavery risk.
- Participation in the CIMIC Group Compliance Working Group - a collaboration of CIMIC operating companies' in-house legal representatives, which drives and tracks compliance in a number of areas, including modern slavery compliance.
- The investigation, evaluation and measurement of the effectiveness and adequacy of Thiess Policies and the Code of Conduct by the Internal Audit Team, who perform an independent assurance function and provide reports to the Board. Internal Audit also provides independent and objective assurance on the adequacy and effectiveness of the Group's systems for risk management, internal control and governance, along with recommendations to improve the efficiency and effectiveness of these systems and processes.

- Ethical matters are reviewed by the Reportable Conduct Group¹ and the Safety, Sustainability and Compliance Committee of the Board, which oversee matters related to ethical standards and practices, and compliance with applicable legal and regulatory requirements and internal policies.
- Quarterly Compliance Certificates are required to be signed by the CEO and their direct reports certifying that their area of responsibility:
 - has policies and procedures in place to regulate their operations
 - has adhered to their regulatory obligations
 - has ensured allegations of sexual harassment reported within the Group have been, or are in the process of being, appropriately investigated and managed, and
 - has conducted relevant modern slavery risk assessments and due diligence.
- Thiess Group operations in Australia (including RTL and MACA) are certified to ISO9001, ISO14001 and ISO45001 which supports compliance with policies and procedures including the Modern Slavery Policy.

Towards Sustainable Mining (TSM) Protocols

In 2023, the Thiess Group continued to participate in the Minerals Council of Australia (MCA) Towards Sustainable Mining (TSM) Taskforce and Initiative Leaders Working Group. TSM is a sustainability framework established by the Mining Association of Canada (MAC) and adopted by the Minerals Council of Australia (MCA) in 2020 for implementation by MCA members beginning in 2024.

TSM includes a Child and Forced Labour Protocol, and in 2023 Thiess Group completed a gap analysis against this and other relevant TSM protocols and developed an action plan to improve performance. Implementation of these action plans is underway and will continue in 2024.

The Thiess Group has also worked with the MCA to develop a TSM implementation pathway for service providers. We will continue to collaborate with and support the MCA in developing the service provider pathway. Once finalised, the aim will be to submit Thiess Australia's first self-assessment TSM scores to the MCA shortly thereafter.

The TSM Protocols, review and proposed self-assessment provides an additional method of assessing and addressing the risks of modern slavery in our operations.

¹ The Reportable Conduct Group comprises the Chief Executive Officer, Chief Financial Officer, General Counsel, and Group Executive – Transformation, People & Communication.

4.1.3 Grievance and reporting mechanism

Open communication is key to maintaining our Code of Conduct. We encourage our employees, subcontractors and partners to voice their concerns should they come across any potentially unethical practices – including any human rights grievances.



Our Group Complaints and Investigation Standard, Workplace Behaviour Policy and Whistleblower Policy, confidential, independent Ethics hotline (Ethics Line) and approach to investigating (independent and victim centric), addressing and remediating breaches all work together to encourage and reliably manage reporting of any potential unethical practices.

Whistleblowers can remain anonymous and disclosures, including modern slavery concerns, may be referred to the Business Conduct Representative who then ensures that any disclosure is investigated appropriately, promptly and confidentially. The Reportable Conduct Group further supports engagement, monitoring, compliance and continuous improvement across the Group.

The Workplace Protection Officer is responsible for safeguarding the interests of any Whistleblower within the organisation.

RTL has dedicated time and resources throughout 2023 to implement the Thiess Group Healthy, Safe and Respectful Workplace Policy and RTL’s Workplace Conduct Procedure across its projects, operations and offices. As a result, RTL has seen an uplift in openness among staff to discuss reportable conduct that involves behaviours not aligned with the Group’s values and vision.

Our internal reporting framework now includes workplace complaints raised across Thiess Group, including MACA and RTL. As the integration of MACA continues into 2024, we anticipate that the wider roll-out of Respectful Workplace and Living our Values training will ensure MACA employees have clarity on expected behaviours and confidence in the complaints and investigations process.

 ACCESSIBLE	 CONFIDENTIAL	 RESPONSIVE
Employees, third party sub-contractors and suppliers, clients and partners can raise a concern about unethical practice with a manager, manager’s manager, Business Conduct Representative or our Ethics Line.	Non-compliances are addressed in accordance with our Group Complaints and Investigation Standard and reported to the Business Conduct Representative and Reportable Conduct Group.	
We encourage reporting, and address, remediate and review for improvement.		

For more information on the Thiess Group’s grievance and reporting mechanism go to thiess.com/about/corporate-governance.

4.1.4 Procurement

Our procurement framework provides policy, systems and processes to support supply chain due diligence.

Activities include assessing risks in our applicable business sectors and conducting comprehensive due diligence and vetting of subcontractors, suppliers and third parties engaged by our businesses.

As part of the framework, the Dealing with Third Parties Policy and Procurement Policy incorporates:

- the management of modern slavery risks into our supplier registration (a business integrity check)
- the screening and onboarding process
- a suite of standard template commercial contracts to be used wherever possible, and
- a set of requirements for suppliers' management of their suppliers.

This approach is key to Thiess Group building and maintaining a reliable and trusted supply chain, and proactively identifying and managing modern slavery risks throughout the term of each contract.

Before any engagement of, or payment to, the relevant party the Group conducts thorough risk assessments, to mitigate potential financial, reputational, and compliance risks.

To manage the risk of trade sanctions or other reputational damage, no payments are to be made or received from a third party who has not been risk assessed and approved in accordance with our procedure.

Our standard form labour hire contracts now include a broader obligation on labour hire providers to disclose criminal history details from all Australian police jurisdictions. This does not include details of any convictions that are non-disclosable in accordance with the governing law.

In 2023, we further improved our procedures for risk assessing suppliers. Our Service and Supply Contract Management (SSCM) guideline has been updated to include the Counter Party Risk Assessments (CPRA) procedure, Unfair Contract Terms, Environmental, Sustainability and Governance (ESG) considerations and job titles. This SSCM guideline, along with the newly uploaded third-party screening tool guideline, were completed in part due to the actions from the Modern Slavery internal audit conducted in 2022. (See section 4.1.5 for more detail on the third-party screening tool).

A key activity undertaken in 2023 was to develop a set of ESG related questions (including questions around modern slavery risks for suppliers). These questions were used to review 62 suppliers in Australia, who were chosen based on commodity, spend and dependency factors. The responses received provided good insight into the ESG strategies and commitments of the suppliers and common themes across the responses were noted to be a commitment by suppliers to enhancing social value and transparent, trusted governance.

4.1.5 Supplier screening and onboarding

Thiess Group has implemented an internationally recognised due diligence solution to screen third parties for a range of risk factors – including the risk of modern slavery.

This supplier screening solution is used to evaluate and monitor vendors, suppliers, and business partners for a range of risks including, but not limited to, the following areas:

- legal status
- watch-lists including sanctions and enforcements, adverse litigation and Politically-Exposed-People (PEP) lists
- country and industry risks
- modern slavery risks, bribery and corruption due diligence by screening the Corruption Perception Index and the Global Slavery Index country and industry
- adverse media, including modern slavery.

The solution leverages information from the Global Slavery Index prepared by the Walk Free Foundation, and records of adverse media are collected from various sources – adverse news includes modern slavery allegations and breaches.

Based on the above multi-factor assessment, each supplier is allocated a risk-rating which may trigger additional investigation and due diligence. This may then lead to the preparation of corrective action plans where applicable, or in some cases, exclusion from working with Thiess Group entities. All suppliers or other third parties who are accepted are subject to continuous monitoring for changes in key risks, for example change in an entity's legal status or the imposition of a sanction or enforcement.

Since its implementation in 2019, and as at December 2023, Thiess Group has risk assessed more than 9,900 suppliers. The below table shows the progress of new suppliers onboarded annually since implementation.

Description	Year	Number of suppliers
Bulk upload of existing suppliers	2019	4,087
New suppliers onboarded	2020	542
New suppliers onboarded	2021	745
New suppliers onboarded	2022	812
New suppliers onboarded	2023	3,714
Total		9,900

In 2023, there were 3,714 suppliers assessed under the Group supplier risk process. A total of 329 suppliers have been removed from our supply chain after being assessed as extreme or high risk without satisfactory mitigation. These suppliers were either engaged before we introduced our third-party risk assessment software and so were only assessed for the first time in 2023, or the software alerted us to a change in supplier risk profile status to that of extreme or high risk.

As part of the MACA integration, we introduced the Thiess Group's due diligence requirements for the MACA supply chain. This required a bulk upload into the third-party screening tool of suppliers who are engaged by MACA's Australian and Cambodian operations. A total of 2,500 MACA suppliers are now risk assessed and monitored. Suppliers engaged by Thiess' operations in North and South America, our India Capability Hub and RTL in Australia, were also bulk uploaded into third-party screening tool and there are now 940 suppliers risk assessed and monitored for any change in risk profiles in those regions.

As part of the integration process, MACA also adopted the Group Procurement Policy, Levels of Authority, Standard Contract Templates and Thiess procedures, and was incorporated into the Group Scope 3 emissions reporting framework. MACA will be integrated into the Group's existing third-party Source to Contract procurement software environment in 2024.

Our Dealing with Third Parties Policy and supplier onboarding process include specific modern slavery due diligence requirements for those we work with. Suppliers are required to comply with applicable laws and the Thiess Group Code of Conduct, and to complete a declaration confirming that no slavery, forced or child labour has been used anywhere by the third party or, to the best of the third party's knowledge, by any direct suppliers to the third party.

The declaration specifically requires suppliers to disclose whether they have:

- been subject to or received any prosecutions, regulatory notices, tendering restrictions, sanction notices, litigation or arbitration concerning allegations of modern slavery or breaches of human rights by their employees or subcontractors and suppliers
- been found guilty of a criminal offence which would include modern slavery crimes
- a compliance management program in place to meet business integrity laws and regulations, including those relating to modern slavery.

Suppliers are also required to notify the Thiess Group if they become aware of any behaviours that are in contravention of applicable laws and confirm they will not use any payments received from the Thiess Group in violation of modern slavery laws and regulations.

Template commercial contracts

Our Procurement Policy requires all Thiess Group companies to engage suppliers using Thiess' suite of template commercial contracts wherever possible. RTL templates and MACA templates have been aligned with Thiess template contracts. The suite includes a number of different forms of contract which can be utilised depending on the scope, location, value and complexity of the works or services to be provided, and the risk profile of the relevant project.

Our template commercial contracts require suppliers to comply with the Thiess Group Code of Conduct, ensuring alignment with our expected behaviours.

The contracts also require suppliers to warrant that they have not been convicted of an offence relating to modern slavery, that they will not breach any modern slavery legislation and that they will comply with any requests from Thiess Group to enable us to comply with all modern slavery legislation, including providing information and documents, and allowing interviews to be undertaken.

Secondary supplier controls

The number of indirect suppliers involved in our businesses is substantial. As a supply chain becomes more remote, influencing the behaviours and conduct of indirect suppliers presents a greater challenge. By raising awareness, engaging ethical direct suppliers, obliging our supply chain to reject the use of modern slavery, and performing due diligence, we can gradually exert more influence.

Our template commercial contracts require our direct suppliers to warrant that their own suppliers enable them to comply with the direct supplier's obligations under the Thiess engagements. Direct suppliers must:

- ensure their own suppliers read, understand and comply with the Thiess Group Code of Conduct which contains information relating to modern slavery, and
- allow Thiess Group to conduct an independent audit of their suppliers to ensure, amongst other things, that they are conducting their business in a proper manner and in accordance with applicable codes of conduct and generally accepted business ethics.

4.1.6 People and employment

The Thiess Group focuses on creating a workplace culture which puts safety first and fosters our values of Discover, Accountability, Respect and Empower. We invest in our people to build safe, rewarding careers, and prioritise cultivating a respectful and inclusive workplace, advancing gender equality, increasing indigenous employment and the use of indigenous suppliers, and investing in local employees where we operate.

People policies

Our overarching People framework guides operations across our businesses, markets and geographies, facilitating compliance with, and often exceeding, local laws.

Policies and processes that help to build respectful, safe and inclusive work environments and to mitigate modern slavery risks include our:

- Recruitment Policy, procedures and management systems with formal approval gates including verification of the candidate's identity and their right to legally work
- Healthy, Safe and Respectful Workplace Policy
- Diversity and Social Inclusion Policy
- Flexible Working Policy
- Parental Leave Policy
- Family and Domestic Violence Policy
- Redundancy Policy

CASE STUDY: Making space in a new tenancy for nursing mothers

The India Capability Hub's new office will feature a dedicated medical room, providing a comfortable, private environment for breastfeeding and expressing milk. Additionally, we will facilitate a crèche facility nearby, ensuring a convenient and safe childcare option for our employees.

These initiatives are aimed at supporting our female employee's work-life balance and focusing on the well-being and care of all team members. This reflects our commitment to create a supportive and inclusive workplace, ensuring that all employees feel valued and cared. By helping employees manage their professional and personal responsibilities, we are demonstrating our dedication to employee support and satisfaction.

These actions were identified and implemented as a result of the Human Rights Impact Assessment (HRIA) undertaken in India in 2022. While not finding any risks of modern slavery, the assessment gave the opportunity for improvements to be made in the business to support our people.

4.1.7 Human Rights Impact Assessment (HRIA)

The Thiess Group's HRIA program approach – *Managing a consistent, disciplined approach to assessing human rights impacts*

Thiess Group's HRIAs are based on the Human Rights Assessment Quick Check prepared by the Danish Institute for Human Rights.

The Group's HRIA self-assessment tools assess categories including governance and leadership, people management, health and safety, community engagement, security arrangements, country risks, and procurement.

Within the people management area, the HRIA and self-assessment tools audit compliance with our template employment contracts and review modern slavery indicators. These indicators include wages and benefits, working hours, employment criteria (such as age), freedom of association, health and safety, unlawful discrimination and worker accommodation.

Assessment steps include engaging leadership, undertaking risk assessment and due diligence, conducting site visits, reporting findings and developing action plans.

Thiess Group has completed HRIAs in Indonesia (2018) (completed by CIMIC), Mongolia (2020-2021) and India (late 2022 – report issue 2023). Preparation for an HRIA in Indonesia commenced in 2023 and is scheduled for completion in mid-2024. Thiess Group aims to conduct an HRIA in one of its regions annually with the location chosen based on GSI, significance of workforce and internal assessment of the potential risks (including whether a review has previously been conducted or the time passed since the previous review).

4.1.8 Education and training

Our mission is to provide safe, rewarding and fulfilling careers for our people. On-the-job development is complemented with a range of learning experiences that build skills and technical capabilities. These are underpinned by our Principles and Code of Conduct.

In 2023, we delivered over 606,054 hours of training across Thiess, which equates to almost 42 hours per annum for each direct employee.

Education and training are integral to our compliance framework, and to engaging and upskilling our people in meeting their legal, regulatory and compliance responsibilities. We monitor, report and manage training completion rates through Thiess' centralised learning management system, LAAMP, and by using on-site project records.

Code of Conduct and other Compliance training

Our foundational Code of Conduct training, called 'Living our Values', covers Thiess Group's Values and Code of Conduct, ethical behaviour, and key policies including health, safety and environment, workplace behaviour - including anti-bullying and harassment - anti-bribery and corruption, and conflicts of interest.

We require employees to complete Code of Conduct training via e-learning within three months of their commencement with refresher training completed every two years. We also provide more detailed face-to-face Code training to employees in high-risk roles. Additionally, all Thiess employees complete an online training module on Modern Slavery as part of their induction, with refresher training completed every two years.

In 2023, Living our Values training was delivered to new employees in high-risk roles and those who were unable to attend the training in 2022. 1,294 Thiess employees in high-risk roles completed the face-to-face training. Training was also delivered to the MACA leadership team. The remainder of Thiess' employees are required to complete online Living our Values training during onboarding and then by refresher every two years.

In 2024, we are introducing our refreshed 'Living Our Values' Code of Conduct face to face training, to be completed in alternate years ensuring that individuals in high-risk roles frequently refresh their understanding. This new training format and cycle begins with 'Leading Ethically,' which covers content from our Code of Conduct (which will include modern slavery content), followed by 'Leading Respectfully' in the subsequent year, addressing topics from our Respectful Workplace Standard. The additional online mandatory training module 'Working With Respect', which is to be completed by all Thiess Group staff every two years, encompasses topics from our Whistleblower Policy, Diversity and Social Inclusion Policy, Respectful Workplace Standard, and Code of Conduct.

CASE STUDY: Respectful workplace training

As part of our Healthy, Safe & Respectful Workplace Policy commitments, in 2023 our Group Respectful Workplace Taskforce developed a Global Creating Respectful Workplaces training framework. To ensure the training was embedded, we established a Respectful Workplace Officer network to deliver the training. A call for volunteers from our global legal, health & safety, human resources, learning and development, community and diversity and inclusion teams received a great response, with 87 nominations received.

Partnering with the MATE Program by Griffith and Curtin Universities in Australia, the Respectful Workplace Officers gained training accreditation to deliver the Creating Respectful Workplaces program. The training was contextualised to ensure it was appropriate for our business and the different regions where we operate, factoring in cultural, religious and societal norms and legislative requirements.

The Creating Respectful Workplaces training is based on preventing inappropriate behaviours in the workplace through understanding cause and impact and using the bystander framework, which encourages bystander preventative action, to interrupt and challenge those behaviours.

The Creating Respectful Workplaces training complements Thiess' ongoing Equal Employment Opportunity, Discrimination, Anti-Bullying and Harassment training which is promoting diversity and inclusion. Standing up for human rights, fair treatment of all people and the environment is essential to optimise and share project benefits for a better, fairer future.

The Respectful Workplace Officers have begun delivering the 3.5 hour Creating Respectful Workplaces training, initially targeting our leaders and mental health support network. In 2023, 403 employees completed the training globally including Thiess and MACA team members from Australia, Indonesia, Cambodia, Mongolia and America. We have received high levels of positive feedback from participants, with a 94% satisfaction rating and 92% of participants recommending the course to others.

We are targeting a completion rate for Thiess leaders of 80% by 30 June 2024.



Modern slavery training

Thiess Group delivers modern slavery training globally to equip our people to recognise and report modern slavery risks. This training is included as part of onboarding for all staff. Communication resources support the training, facilitating greater understanding of the issue and its importance to our business.

Refresher sessions for both online and face-to-face training are required every two years. Following the introduction of modern slavery training in 2020, face-to-face training for high-risk roles was conducted in 2023 as part of the Living our Values training. This will continue in 2024 as part of the Leading Ethically training detailed in the Code of Conduct and Compliance training section above.



5. 2023 actions

In 2023, a range of actions were taken to enhance our capabilities to identify, mitigate and prevent modern slavery risks across the Thiess Group’s operations and supply chain, and respond should any impacts occur. These actions are shown below.

 Actions	Status at end of 2023
<p><i>Performance on our 2022 outlook</i></p>	
<p>Continue to enhance our understanding and knowledge of modern slavery risks, including the potential risks associated with changes to our business as it adapts to meet its diversification and decarbonisation commitments.</p>	<p>Ongoing </p>
<p>Continue to transition RTL to Thiess/Thiess aligned policies and procedures where appropriate.</p>	<p>Complete </p>
<p>Continue to transition MACA to Thiess/Thiess aligned policies and procedures where appropriate</p>	<p>Ongoing </p>
<p>Implement recommendations from the Internal Audit review that was undertaken in 2022.</p>	<p>Complete </p>
<p>Implement actions arising from HRIA of our operations in India.</p>	<p>Complete </p>
<p>Undertake a second HRIA of our operations in Indonesia.</p>	<p>Ongoing </p>
<p>Commence planning to complete an HRIA in Cambodia in 2024.</p>	<p>Complete </p>
<p>Continue to build our people’s capability to recognise and report any risk of modern slavery.</p>	<p>Ongoing </p>
<p>Continue assessments of high-risk suppliers having regard for commodity, jurisdiction and sourcing methods.</p>	<p>Ongoing </p>
<p>Continue to screen suppliers and business partners through the third-party screening tool and if necessary, develop and implement appropriate remediation measures.</p>	<p>Ongoing </p>
<p>In line with Thiess’ new Healthy, Safe and Respectful Workplace Policy, all new suppliers on-boarded through the Source to Contract software (Australia only) will be required to complete a registration pre-qualification questionnaire, which includes questions relating to the policy and training within their organisation. Assessment of existing suppliers using the questionnaire will continue in 2023.</p>	<p>Ongoing </p>
<p>Finalise review into implementing a third-party risk assessment platform for RTL.</p>	<p>Complete </p>
<p>Transition MACA supplier due diligence processes to align with Thiess processes including transitioning existing MACA suppliers to third party risk assessment platform for monitoring.</p>	<p>Complete </p>

5.1 Assessing effectiveness

Our assessment of effectiveness is evidence based and includes monitoring and analysing risk analysis and compliance assurance and internal audit results, supplier screening and risk assessment, monitoring and closeout of corrective action plans, training participation rates, communications engagement, Human Rights Impact Assessment results, the completion of improvement plans and responsiveness to grievances.

Quantitative data and regular qualitative reviews facilitated by our governance framework shape our annual planning process.

Key touch points which support our assessment and planning process include our:

- cross-Group engagement at the Modern Slavery Committees and via Compliance Working Group representatives (see section 4), and
- risk analysis (see section 3)



6. Looking ahead

6.1 2024 priorities

Over the next year, Thiess Group will focus on continuing to:

- Enhance our understanding and knowledge of modern slavery risks, across all operations, including any potential changes to risks as we expand/differentiate our businesses or acquire new businesses in line with our diversification and decarbonisation commitments.
- Transition MACA and any newly acquired businesses to Thiess Group/Thiess aligned policies and procedures where appropriate.
- Progress and finalise the HRIA of operations in Indonesia and implement any actions identified.
- Undertake an HRIA of operations in Cambodia and implement any actions identified.
- Review and revise the HRIA risk assessment tool (and methodology) within the Thiess Group for future HRIAs and continue to assess and update other modern slavery tools and controls where relevant.
- Conduct a review of our approach to modern slavery risk management with reference to the Australian Government's review of the *Modern Slavery Act 2018 (Cth)*.
- Risk assess new suppliers, vendors and business partners using the third-party screening tool and, if necessary, develop and implement appropriate corrective actions plans and/or remediation measures.
- Integrate MACA into the Group's existing third-party Source to Contract procurement software environment. Prepare for introduction of Source to Contract software in regions (Americas and Indonesia) as updates are implemented to the software to provide multi-lingual capabilities and region-specific access.
- Enhance processes in procurement, including:
 - expanding ESG assessments to all other regions
 - performing additional supplier assessments (post-award) on performance at project level (globally) with specific questions relating to alignment with Thiess's ethical values and practices, i.e. sustainability, labour rights and being respectful.
- Monitor existing suppliers, vendors and business partners using the third-party screening tool to identify, among other things, any breaches, fines or sanctions in relation to modern slavery and other ESG risks.
- Build our people's capability to recognise and report risks of modern slavery.
- Raise employee awareness via mandatory Modern Slavery training and other compliance training modules.
- Embed our modern slavery risk monitoring and reporting activities.

6.2 Ongoing engagement and communication

We will continue to engage with Government, industry, regulators and other organisations to build awareness and understanding to combat modern slavery.

Engagement is a key input to our continuous focus on modern slavery risks and developing a trusted supply chain.

We value gaining and sharing insights with and from relevant organisations, including:

- Government and regulatory bodies in the different regions in which we operate – our Legal and Compliance teams monitor for updates on the status of legislation and developments in the area of modern slavery.
- Australian Border Force Modern Slavery Business Engagement Unit – relevant resources are consulted where applicable to aid our understanding of or to obtain guidance in relation to modern slavery matters and preparation of the Statement.
- Industry Associations – we value and consider guidance, advice and recommendations provided by industry associations in the regions in which we operate to assist with identifying and addressing modern slavery risk in the mining, mineral processing, civil, construction and services sectors. We hold memberships with multiple trade, industry and not-for-profit organisations, at local, regional, national and international levels.
- External presentations, seminars or forums – members of our People, Legal and Compliance teams attend and/or participate in external presentations, seminars or forums to improve their awareness of modern slavery and ESG risks and to embed learnings within the business.



Appendix A

Thiess Group reporting entities

	ACN	Registered Address
Thiess Group Holdings Pty Ltd	646 054 757	179 Grey St, South Bank, QLD, 4101
Thiess Group Finance Pty Ltd	646 055 629	179 Grey St, South Bank, QLD, 4101
Thiess SQ Holdings Pty Ltd	645 403 532	179 Grey St, South Bank, QLD, 4101
Thiess MidCo Holdings Pty Ltd	645 168 672	179 Grey St, South Bank, QLD, 4101
Thiess Group Investments Pty Ltd	110 779 167	179 Grey St, South Bank, QLD, 4101
Thiess Pty Ltd	010 221 486	179 Grey St, South Bank, QLD, 4101
RTL Mining and Earthworks Pty Ltd	152 855 135	Eastern Road, Yallourn, VIC, 3825
MACA Limited	144 745 782	45 Division Street, Welshpool, WA, 6106
MACA Civil Pty Ltd	146 021 347	c/- Bentleys (WA) Pty Ltd, Suite 2, Level 11, 216 St Georges Terrace, Perth, WA, 6000
MACA Mining Pty Ltd	102 886 064	c/- Bentleys (WA) Pty Ltd, Suite 2, Level 11, 216 St Georges Terrace, Perth, WA, 6000
MACA Plant Pty Ltd	110 779 167	c/- Bentleys (WA) Pty Ltd, Suite 2, Level 11, 216 St Georges Terrace, Perth, WA, 6000

Modern Slavery Act mandatory criteria

The table below identifies where in this statement we have addressed each of the mandatory criteria required by the *Modern Slavery Act 2018* (Cth):

No	Mandatory Criteria	Page number
1	Identify the reporting entity	4, 30
2	Describe the structure, operations and supply chains of the reporting entity	7 - 10
3	Describe the risks of modern slavery in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	11
4	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	12
5	Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	27
6	Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	4
7	Include any other information that the reporting entity, or the entity giving the statement, considers relevant	29

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