

2023

MODERN SLAVERY STATEMENT



SAMSUNG C & T CORPORATION



SAMSUNG C&T

Samsung C&T Corporation

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ABOUT THIS REPORT

Report Overview

Samsung C&T Corporation (ABN 49 160 079 470) has published the Modern Slavery Statement to disclose information on the corporate practices to mitigate modern slavery risks in the operations and supply chains in Australia and the results of such activities to stakeholders in a transparent manner.

Reporting Scope and Period

This Modern Slavery Statement for the period 1 January 2023 to 31 December 2023 was prepared by Samsung C&T Corporation in consultation with the Board of Directors under the corporate ESG guidelines and governance.

Modern slavery can occur in every industry and sector and has severe consequences for victims. Modern slavery also distorts global markets, undercuts responsible business and can pose significant legal and reputational risks to entities. Samsung C&T Corporation has a responsibility to respect human rights in our operations and supply chains, as outlined in the United Nations Guiding Principles on Business and Human Rights.

The scope of this report includes the corporate action plans and risk management framework to assess and address modern slavery risks in our operations and supply chains in Australia. This highlights Samsung C&T Corporation's commitment to mitigate modern slavery risks.

Reporting Standards

This statement was made pursuant to the Commonwealth Modern Slavery Act 2018 (the Act) which requires Samsung C&T Corporation in Australia as the reporting entity to report on the risks of modern slavery in the operations and supply chains, and actions to address those risks, and for related purposes.

In this statement, the terms "we", "us", "our" and "the company", are used where reference is made, in general, to the reporting entity.

About Samsung C&T

The current Samsung C&T began as Samsung Everland, established in 1963 with the intent of national land development. It has expanded to include resort, food & beverage, and landscaping businesses as a leading service provider in Korea. In December 2013, Samsung Everland acquired the fashion business of Cheil Industries, a textile company that has led Korea's fashion industry, after which the company changed its name to Cheil Industries and focused on establishing itself as a lifestyle company.

The former Samsung C&T, which originates from the "Samsung Sanghoe" established in 1938, was designated in 1975 as Korea's first general trading company to lead overseas sales operations. In December 1995, the company merged with Samsung Construction, and has since been actively engaged in global business through its offices in 46 countries.

The former Samsung C&T and Cheil Industries, which had been building their reputations as leading companies in their respective industries, merged in September 2015, enabling the company to grow into a global business partner and lifestyle innovator across the sectors of construction, trade, fashion, and resorts.

In construction sector, Samsung C&T Engineering & Construction Group ("**Samsung C&T Group**") specialises in engineering, procurement, and construction in the fields of building, civil infrastructure, plant, and housing.

In 2012, Samsung C&T Corporation ("**Samsung C&T**") was established in Australia as the branch of Samsung C&T Engineering and Construction Group from Republic of Korea, participating in major infrastructure construction projects in Australia.

Samsung C&T Australia's registered address and principal place of business is Level 2, 44 Market Street Sydney NSW 2000.

Core Values

The guiding principles for all management decisions to ensure a balance between stability and dynamic change

1 Safety - Our calling to create a safe and healthy world

- Our highest value in all our decisions and actions.
- The safety of our employees, partners and society begins and ends with us.

2 Integrity - Obligations of a global citizen to create a fair transparent society

- Abide by rules and laws, work according to principles and standards.
- Act with truth and honour to earn respect.

3 Trust - Foundation to thrive in a sustainable world

- Earn trust through commitment to social responsibility.
- Keep promise made to clients and society.

4 Authenticity - Passionate Sincere drive for excellence

- Overcome limit with urgent drive and actively achieve goals.
- Resolve issues together through open communication.

5 Challenge - Determination to achieve new growth in face of change

- Embrace change without fear of the challenge.
- "Proactive" not reactive



Our Commitment

Samsung C&T Group has focused on the establishment of ESG operating system since 2015 and established and implemented its long-term direction for ESG based on executing the operating system. Since 2021, Samsung C&T Group has established the mid-term strategies and objectives for the sustainability of the company and has reflected these in KPI and strategic tasks at global level.

Samsung C&T, as an Australian branch of Samsung C&T Group continues to be committed in mitigating the modern slavery risks occurring within its business in Australia, complying with Samsung C&T Group's board centred ESG management framework and operating system. The Human Rights Management system as part of its global ESG management is in place to eradicate the risk of human rights and modern slavery in every business operation, supply chains and business relationships in Australia.

Samsung C&T understands that modern slavery can take many forms and is committed to increasing awareness within its workforce of exploitative practices including human trafficking, forced labour, servitude, deceptive recruiting and child labour. Samsung C&T is fully committed in addressing inherent and potential modern slavery instances and continues to prevent and mitigate any identified modern slavery instances/risks that are both directly and indirectly linked to our business operations.

As part our commitment to minimising the risk of modern slavery, we have continued to discuss details of the Modern Slavery Act 2018's guidelines and reporting requirements with the Board of Samsung C&T Group and our joint venture partners. Further, we have undertaken a number of actions under the global ESG guidelines and governance to address these requirements and worked with the Board in developing this modern slavery statement.

We do not tolerate modern slavery and will not knowingly engage in modern slavery with any consultants, suppliers or contractors.

2023 Calendar Year Review

This Statement outlines the risks of modern slavery in our operations and supply chains, as well as our strategies and actions to assess, prevent, and mitigate these risks. We are continually enhancing our understanding and mitigation of modern slavery risks within our operations and supply chain. During this reporting period, Samsung C&T has undertaken the following actions:

- Developed an in-depth understanding of modern slavery risks aligned with our business activities.
- Reviewed our approach to modern slavery risk management in compliance with the Australian Government’s Review of the Modern Slavery Act 2018 (Cth).
- Assessed potential risks from new suppliers, subcontractors, and business partners using a screening tool, and implemented appropriate corrective action plans which include modern slavery risk assessment
- Built our employees' capability to recognise and report potential modern slavery risks and enhancing employee awareness through Modern Slavery training
- Partnered with suppliers, to increase awareness of modern slavery risks and potential indicators
- Continued to track our progress and transparently disclosing our risks and actions, including the implementation of our due diligence evaluation tool
- Reviewed and strengthened tools and processes used to assess and address modern slavery risks.

Samsung C&T continues to increase communication through wide range of channels including the Sustainability Report and company website. Internally, Samsung C&T exerts effects to raise ESG awareness including the risk of modern slavery in business operations among employees and business partners through company broadcasts, training sessions and Modern Slavery Awareness.

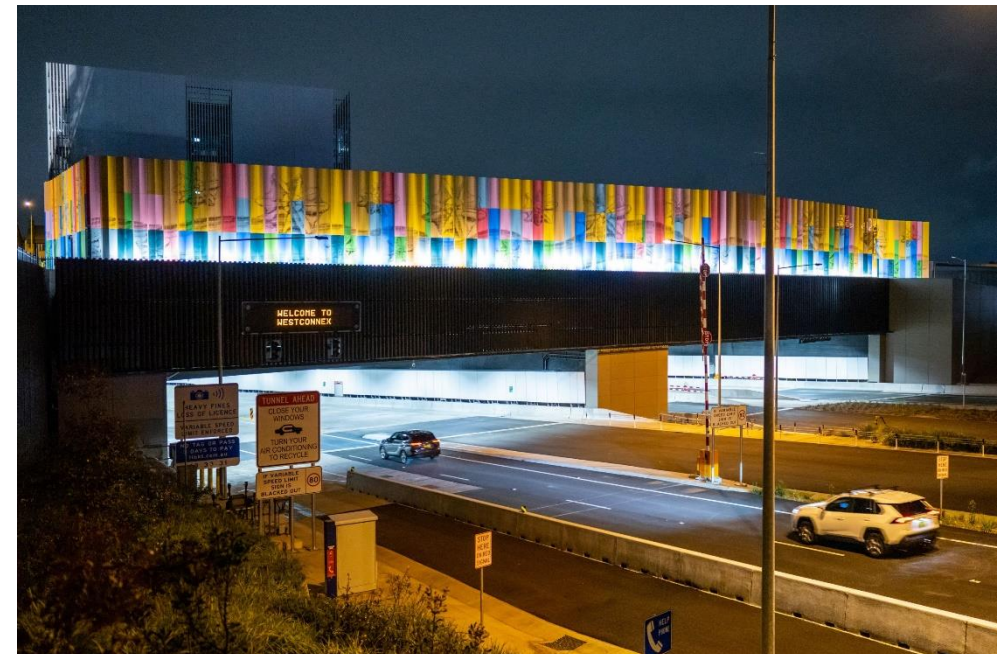
We have zero instances of modern slavery detected in our operations or supply chains during the reporting period. We will not tolerate modern slavery and will not knowingly engage with any consultants, suppliers, or contractors involved in such practices.

Operations and Supply Chains

Operations

Samsung C&T’s civil infrastructure business unit focuses on projects for roads, bridges, tunnels, railroads, ports, airports, and hydraulic dams in Australia. We are also expanding our scope of operations to include the provision of consolidated energy solutions including renewable energy and transmission lines in the Australian market.

Samsung C&T continued to form part of the Acciona, Samsung, Bouygues Joint Venture (ASBJV), delivering the WestConnex M4-M5 Link Tunnels New South Wales in Australia. In June 2023, Samsung C&T successfully completed WestConnex M4-M5 Link Tunnels with joint venture partners.



WestConnex is one of Australia’s largest road infrastructure projects and, once complete, will connect Sydney’s west and southwest suburbs with the city centre, via a 33-kilometre traffic-light-free motorway. WestConnex also links Greater Sydney to major international gateways at Sydney Airport and Port Botany, and the future Western Harbour Tunnel, Beaches Link and M6 Motorway.

Project	Project Status
WCX1b (CPB Samsung John Holland Joint Venture ABN 12 858 428 316)	Opening Completion in July 2019 and under Defect Correction Period
WCX2 (CPB Dragados Samsung Joint Venture ABN 42 484 012 873)	Opening Completion in July 2020 and July 2020 to July 2023 under Defect Correction Period
WCX3a (ASBJV ABN 46 422 742 617)	Opening Completion in January 2023 and Jan 2023 to Jan 2025 under Defects Correction Period

During this reporting period, Samsung C&T in joint venture with GenusPlus Group, has achieved a significant milestone by securing three key contracts for the engineering, procurement, construction, and commissioning of the Balance of Plant scope and BESS installation for a 600MW/1,600MWh battery energy storage project for Phase 1 of the Melbourne Renewable Energy Hub (MREH) with Equis Energy and Victoria’s State Electricity Commission (SEC). MREH is a globally significant energy storage precinct located 25km northwest of Melbourne’s commercial business district. Fully developed, it will be a 1.2GW/2.4GWh Battery Energy Storage System (BESS); one of the world's biggest.

Project	Project Status
Melbourne Renewable Energy Hub (MREH) BESS	November 2023 - Present

Samsung C&T continues to work in collaboration with governments, business partners and suppliers to design, procure, and construct infrastructures in Australia.

Supply Chains

Samsung C&T supports its partners to achieve sustainable growth and endeavours to reinforce partnership through mutual respect and cooperation. Samsung C&T undertakes rational procedures at every stage of partner selection and contracting to maintain subcontracting transparency. When selecting partners, we conduct ESG inspections to build a stable supply chain and foster a healthy industrial ecosystem. In Australia, Samsung C&T completes joint venture projects in line with applicable government technical, sustainability and social procurement requirements. To do so, we are directly associated with contractors and sub-contractors. Our procurement activities encompass

many aspects of the lifecycle of major infrastructure, including design, construction and operations and maintenance and we do not engage with suppliers to purchase goods or services and have no direct supply chain exposure to modern slavery risks. Whereas our contractors/subcontractors engages with various local and overseas suppliers to obtain commodities for the infrastructure projects. In addition to the Joint Venture, Samsung C&T is supplied with a range of goods and services to support its branch office operations, comprising the administrative and professional services. These include Cleaning, Marketing suppliers, IT consulting and Payroll.

Our People

Samsung C&T’s direct workforce comprises 30 Samsung C&T employees who are employed in various roles across the project. Our people are involved in a broad range of activities ranging from engineering, procurement and construction for the projects and head office functions such as Finance & Operation, People & Culture, Business Development, Renewables Development, Operational Management, Control, M&E and Corporate Affairs. All of Samsung C&T direct employees are full-time and employed in Australia, and are covered by industrial instruments including modern awards, Enterprise Agreements, and individual employment contracts. Each of these mechanisms meets or exceeds the minimum entitlements prescribed under the National Employment Standards. The standards set out the 10 minimum employment entitlements that must be provided to all Australian employees.



Modern Slavery Risks

Samsung C&T acknowledges our responsibility to identify inherent and potential modern slavery risks within our business operations and supply chains. We aim to assess these risks in alignment with the UN Guiding Principles on Business and Human Rights (UNGP). Utilising these frameworks, we have evaluated how we might cause, contribute to, or be directly and indirectly linked to potential or actual instances of modern slavery.

Throughout the reporting period, there were no instances or concerns of modern slavery or adverse human rights impacts. Furthermore, there were no issues raised by individuals or communities through the human rights grievance system, either internally or externally.

Risk Assessment

Operations	<p>Consistent to previous reporting period, Samsung C&T assessed its business operations as being low risk to modern slavery as our policies and practices under our Human Rights Risk Management are effectively in place mitigate these risks for our direct workforce and diverse areas of our business activities.</p> <p>As part of our joint venture partnership with contractors, we were committed to zero harm in our business operations. This commitment was demonstrated by the weekly safety walks conducted on-site by the contractor’s senior management team. For example, a number of innovative practices and technologies were utilised on the project during the reporting period until the completion of the project, for WestConnex M4-M5 project.</p> <p>Furthermore, Samsung C&T and the joint venture partners comply with the Modern Slavery Act, adhering to their respective codes of conduct and risk management framework to help mitigate potential modern slavery risks relating to the broader business operations.</p> <p>We have established mechanisms to mitigate against causing modern slavery within our operations, maintaining appropriate internal policies, procedures and practices.</p>
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Supply chain

Samsung C&T supports its partners to achieve sustainable growth and endeavors to reinforce partnership through mutual respect and cooperation. We have continuously reviewed our suppliers during the reporting period and have assessed local suppliers to be at low risk to modern slavery as evidenced by our supply chain modern slavery risk assessment. Further, we have a number of ongoing procedures in place to monitor, assess and mitigate modern slavery risk with our suppliers through the following:

- ESG inspection on partner companies
- ESG inspection checklist for partners
- ESG inspection performance of partners and periodic assessment of contractors
- Risk assessment reports implemented by the partnership group
- Monitoring and responding to grievance reports
- Staying up to date with relevant news, regulatory changes, or industry reports
- Communicating regularly with suppliers prior to engagements about the regulations of modern slavery
- Samsung C&T modern slavery questionnaire is provided to our suppliers

Samsung C&T has conducted a thorough risk assessment of our supply chain and has determined that the risk of modern slavery is low. Our partners and contractors are selected based on their compliance with the Modern Slavery Act, and they strictly prohibit any modern slavery practices within their operations and supply chains. When entering into contracts with partners for projects, Samsung C&T utilises a comprehensive risk management framework, including supplier screening tools and modern slavery questionnaires.

Our partners are committed to taking all reasonable actions to address and eliminate any modern slavery practices, including those found within their own supply chains. They adhere to the UNGP by taking appropriate steps to remediate any adverse impacts caused or contributed to by their operations. The procurement activities of our joint venture partners are diligently managed to eradicate modern slavery risks through robust internal policies, a stringent Supplier Code of Conduct, and effective supply chain management practices.

Risk Indicators

To identify areas of inherent and potential risk within our operations and supply chains, we considered the adjacent risk indicators for the potential occurrence of modern slavery.

Tending project	<p>Samsung C&T, along with joint venture partners, continues to focus on addressing and actioning any modern slavery risks within business operations and supply chains. As part of tender evaluations, The Contractor’s procurement Lead performs a risk assessment of suppliers to identify any modern slavery risks by applying the following rating scale:</p> <ul style="list-style-type: none"> ▪ High (goods are being manufactured in known area for slavery) ▪ Medium (goods are being manufactured in country known for slavery but not in known area) ▪ Low (goods are being manufactured overseas but not in a country known for slavery) ▪ Nil (supplier can account for the full supply chain and confirm there is no risk of slavery)
Major project construction materials	<p>We have ensured that modern slavery is addressed in our materials via the following:</p> <ul style="list-style-type: none"> ▪ making reference to our Modern Slavery policy ▪ highlighting the risk of modern slavery with all contractors and suppliers ▪ use of a Modern Slavery questionnaire for new suppliers <p>During the reporting period, the JV partners undertook the risk mapping of their supply chain for the projects to identify and assess the modern slavery risks in the business operations.</p>

Further, specific checks were completed by the JV partners on “risk country” supply consistent to previous reporting periods and requesting either a modern slavery procedure, policy and/or statement from the Contractor’s main suppliers. In addition, the Contractor has addressed modern slavery risks with its supplier contracts.

In addition to the above measures, during this reporting period, the key actions Samsung C&T has undertaken to mitigate modern slavery risks has included the following:

- 1** reviewed existing and identify new policies, procedures and practices to better address modern slavery risks
- 2** Implemented a Modern Slavery policy to ensure that: we are compliant with local, national and other applicable laws and regulations in the areas in which it operates; and we act to prevent, mitigate and where appropriate, remedy modern slavery in our operations and supply chains
- 3** roll out training for our targeted key groups including for all our staff
- 4** communicated with all contractors and suppliers
- 5** modern slavery section included in the Samsung C&T employee handbook
- 6** developed a Modern Slavery questionnaire for new suppliers
- 7** having “Awareness Days” for Samsung C&T employees including awareness for Modern Slavery
- 8** conduct annual review for existing suppliers

Efforts to protect human rights

Samsung C&T agrees that forced labour and child labour represent serious human rights violations that cannot be permitted under any circumstance.

Samsung C&T is also participating in various efforts by the international community to eradicate such practices. Samsung C&T strictly forbids the use of forced labour and child labour in all business sites and partner companies. In order to prevent violations of human rights caused by faulty work contracts, the company’s policy requires all business sites to prepare work contracts in the native language so that local workers can accurately understand the full content of the work contract.

The human rights risk evaluation process conducted by Samsung C&T for partner companies also includes items on forced labour and child labour.

During the reporting period, Samsung C&T progressed multiple initiatives designed to enhance our understanding of— and responses to—modern slavery risks. To continuously improve our actions to address modern slavery risks, we draw on internal and external human rights expertise to review our modern slavery statement drafts and the actions that support these statements.

Actions Taken To Assess and Address Modern Slavery Risks

Samsung C&T’s management approach to modern slavery risks is consistent as previous reporting periods. Samsung C&T in Australia endeavour to continuously improve the level of human rights risk management and ESG governance to identify, mitigate and eliminate any modern slavery risks within its business operations and supply chains.

Samsung C&T continues to leverage Samsung C&T Group’s management approach, governance and management frameworks to ensure we apply consistent and integrated approach to assess and address modern slavery risks. In 2023 Calendar Year, we undertook our management approach collaboratively with our workforce, partners, contractors and suppliers for the risk assessment of modern slavery within our business operations in Australia and to strengthen our industry’s understanding of modern slavery risks and the actions we take to address them.

Management Approach

Samsung C&T respects human rights as the universal value for humankind and has a human rights management system in place to protect the dignity and values of all stakeholders, including its employees, by strictly complying with regulations and laws of each country where its business sites are located. Samsung C&T also respects the freedom of association for all workers and assures the three labor rights protected under the Constitution. Going forward, Samsung C&T will identify and manage possible risks to human rights in advance, and continue its efforts dedicated to protecting the human rights of all stakeholders.

Human Rights Management Policy

Samsung C&T not only strictly complies the relevant legislation and regulations related to labor and human rights, but has also selected the “respect for basic rights and spread the corporate culture of mutual cooperation” as one of its key areas that are crucial for the successful establishment of the ESG management system, and built an ESG inspection system for its business sites and partners. The ESG inspection system also involves inspection and assessment of human rights risks and ensures

fulfillment of the responsibility to respect human rights according to the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and ILO’s international labor standards to manage risk of business sites, partner companies and local communities.

Human Rights Risk Management

Risk management process for human rights at business sites	
Risk identification and assessment	Samsung C&T identifies labor and human rights issues and vulnerable areas within each business sites through inspection on labor and human rights and enforces measures to make improvements at business sites where issues are found. The human right risks are assessed through self-inspection by firstly distributing checklists at the site. The checklist is applicable to all areas of human rights including voluntary work, child labor, legal working hours, etc. The site inspection is carried out for the business sites subject to intensive supervision where relevant issues are detected as a result of inspection. In particular, by carrying out both self-inspection and visiting inspection together, the Group makes sure no human right risks are omitted from business sites. Furthermore, if necessary, visits by third-party experts and interviews with team leader and person in charge are conducted to ensure expertise and objectivity in the inspection results.
Establishment of mitigation and improvement action process	After completing the risk assessment, the Group applies a mitigation and improvement action process in place at all business sites where risks are found. For the past three years, the Group has continuously increased the percentage of business sites where the inspection on labor and human rights is conducted and maintained the percentage of business sites that apply improvement measures at 100%.
Improvement activities monitoring	Samsung C&T is consistently monitoring the implementation status of improvement activities to enhance the effectiveness of improvement action process.
External communication	Samsung C&T seeks to improve the level of human rights at business sites through the management of matters that need improvement identified through human rights risk inspections.

Risk management process for human rights at business sites

Risk identification and assessment	Execution of self-inspection and site inspection for nine areas Discovery of issues and areas that require an improvement
Establishment of mitigation and improvement action process	Establishment and implementation of improvement plans for each business sites and partner

Implementation monitoring	Monitoring of implementation status for improvement activities
External communication	Disclosure of annual major activities and performance results through sustainability reports, etc.

Checklist for human rights at business sites

Inspection of human rights protection in business sites Samsung C&T uses checklists based on international regulations to inspect the ESG criteria for business sites in each group. Through this process, the company identifies labour and human rights issues and areas of vulnerability, and business sites where such issues and vulnerabilities are found and formulates plans for improvement.

Checklist	Main evaluation checklist
Voluntary work	Draft labor contracts, no forced labor, no keeping of ID card, etc.
Child labor	Strictly inspect the legal age when hiring
Legal working hours	Observe overtime working hours, weekly holidays, etc.
Wages and welfare benefits	Observe the minimum wage and other wage-related matters specified in the labor contract, etc.
Humane treatment	Protect maternity by means such as assuring maternity leave, run a sexual harassment and violence monitoring channel, guarantee severance pay, establish whistleblower policy, and inform/educate the employee how to approach.
Anti-discrimination	Prohibit discrimination in the recruitment/ /promotion/training, prohibit discrimination based on gender/religion/race/ form of employment, etc.
Freedom of association	Guarantee the freedom of association, eradicate any disadvantages for trade union activists, etc.
Education and training	Ensure educational opportunities are available, maintain the ratio of welfare benefits, the ratio of long-term employees, etc.
Others	Guarantee rest during hot weather, ensure monitoring of human rights issues in the region, etc.

ESG inspection on partner companies

Samsung C&T includes the labor and human rights in ESG inspection for partner companies. The Group implements the measurement actions for all partner companies where risks are identified as a result of inspection, and uses the ESG inspection results when registering new partner companies and entering into new agreements with previous partner companies

Checklist for human rights at business sites for partner companies'

Checklist	Main evaluation checklist
Training	Training on the field of labor and human rights
Employment contract	Preparation, distribution, and storage of individual labor contracts
Working hours	Payment of extra allowance for overtime work, implementation of the weekly holiday scheme, payment of additional allowance, etc.
Discrimination	No discrimination in the promotion or educational opportunities based on the form of employment, nationality, etc.
Child labor	Prohibited employment of workers under the age of 18 and compliance with legal requirements for employment
Forced labor	Rules on the prohibition of forced labor
Foreign worker	Legality of employment of foreign workers at construction sites and assigned jobs also in compliance with the immigration requirement.

Eradication of forced labor and child labor

Samsung C&T strictly forbids the use of forced labor and child labor in all business s sites, partners and affiliates. When hiring local employees at an oversea business site, contracts include the relevant description explicitly stated in languages of each country, and the ESG checklists include forced labor and child labor. Furthermore, on-site self-inspections are conducted on a regular basis to ensure compliance with labor laws and check for labor law violations that may occur at construction sites.

Each business site thoroughly checks whether there are any minors under the age of 18 to eradicate child labor, and prohibits overtime and holiday work without individual consent to prohibit forced labor. Samsung C&T in Australia ensures compliance with local labor laws of each business site through inspection on laws of human rights and labor and organisational management. Also, we continue to improve the awareness on eradication of forced labor and child labor by modifying the employment contract and contract document and providing the local labor trainings.

Our management approach, human rights risk management and human rights risk inspection enhance our ability to address, assess and prevent the risk of modern slavery. This risk management framework for human rights also provide assurance to eradicate potential modern slavery risks in our operations and supply chains through the cycle of cohesive implications, the performance assessment, and our continual improvements. In addressing and acknowledging modern slavery risks, Samsung C&T also implemented the following governance frameworks in place which govern our operations and supply chains.

Policies and Procedures

The policies and procedures for managing modern slavery risk are managed and implemented by Samsung C&T in Australia. These policies and procedures, including how they support our actions to address modern slavery risks, include:

Policy foundation
Modern Slavery Policy
Employee Code of Conduct
Prevention of Discrimination, Bullying and Harassment Policy
Whistleblower Policy
Global Health & Safety Policy
Industrial Relations Policy
Sustainability Policy
Supplier Code of Conduct
Privacy Policy
Human Rights Management Policy

Supplier Code of Conduct

Samsung C&T expects a high level of operating standards for suppliers. Accordingly, to reinforce compliance management, the basis of shared growth between suppliers and Samsung C&T, we established the supplier code of conduct (hereinafter referred to as the “code”). Also, our suppliers must thoroughly comply with Australian laws and regulations, secure a safe working environment, implement a management system to ensure that workers are respected, and run their business ethically.

1	Human rights and labor	Suppliers must protect the human rights of their workers and guarantee their dignity at the global level. It applies to all types of workers, e.g. temporary workers, migrant workers, interns and temporary agency workers. Legal work and protection of rights must be guaranteed for workers in accordance with local laws and regulations.
2	Health, safety, and environment	Suppliers must be aware that it is mandatory to guarantee workers’ safety and health in all activities of the company, including production of products/services. Supplier must make efforts to implement a safe and healthy workplace and maintain it in accordance with local laws and regulations.

3	Ethical management	In managing business operations, suppliers’ management activities must comply with all local laws and regulations, and Samsung C&T requires that suppliers should maintain a high level of ethical standards.
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This code presents what Samsung C&T requires of suppliers. This code applies to all types of organisations that design, sell, manufacture or provide our products and services. This code is based on global standards and guidelines. Also, it may be revised if Samsung C&T’s supplier management policy and standards are changed. If this code conflicts with the local laws and regulations, stricter standards will be applied first.

Education and Training

Samsung C&T offers various training courses on this subject to all of its business groups in order to prevent inequalities concerning employment, dismissal, promotion, pay grade, education and training opportunities, and so on based on sex, race, age, disability, religion, and social status, and to raise awareness of employees regarding this matter. Our operation of an educational program to raise employee and partners awareness also includes the modern slavery training. The modern slavery training allows our employees and partners to recognise the importance of mitigating any forms of modern slavery risks and to understand how modern slavery may occur in our operations and supply chains. We have included modern slavery awareness training within its induction process.

Education	Training content
Mandatory education	Prevention of sexual harassment, prevention of workplace bullying, improvement of perception towards persons with disabilities.
Diversity & inclusion	Diversity & inclusion - Including training for new employees, Global Leadership Course, Global Appreciation Course, etc.
Modern slavery risk	Modern Slavery which educates employees on: <ul style="list-style-type: none"> ▪ stories from survivors of modern slavery ▪ key risks surrounding modern slavery ▪ key policies governing our approach to these risks ▪ Internal grievance channel in addition to our whistleblower service
Compliance Training	Deals with various topics of potential compliance risks including lesson learned, CEO message, Quiz, monthly awareness newsletter.

Measuring Effectiveness

While the measures for effectiveness remain largely the same as in the previous reporting period, we are committed to evolving and improving our processes to better gauge the impact and effectiveness of our Human Rights Risk Management. This reporting period, our focus was on assessing our suppliers through our evaluation tool and inspecting human rights practices at business sites and partner companies. We aimed to capture more detailed information on modern slavery risks deeper in the supply chain and how our suppliers manage these risks. Additionally, we continued our collaboration and awareness-raising efforts through training. In this reporting period, we continued to evolve our processes to measure and assess the effectiveness of our actions to address modern slavery which are outlined as follows:

Workstream	Controls or action effectiveness
<p>ESG Inspection of labor and human rights at business sites and to partner companies</p>	<p>For business sites, Samsung C&T conducts inspection of labor and human rights for business sites for each group once a year, and establishes and implements mitigation and improvement actions for identified risks. Execution of such improvement measures are regularly monitored to ensure that they are properly implemented and that actual improvements are made. The inspection is basically done through document reviews to allow coverage of as many sites as possible, although on-site visits are also made for critical management sites. In particular, external labor and human rights experts participate in the on-site inspections in order to ensure objectivity and professionalism. Various methods including document review, on-site inspection, and interviews are used to hear the voices of stakeholders and identify practical human rights issues.</p> <p>For partner companies, Samsung C&T selects its partners through a fair and reasonable process, and conducts ESG inspection on its partners to manage risks throughout the supply chain. We conduct inspections not only for newly registered partners but also for existing construction partner, and if any compliance-related violations are found in a partner company, we carry out measures such as suspension of transactions and permanent exclusion. In addition, the results of the ESG inspection are reflected in the review of the overall supply chain, which is used as a criterion for selecting key partners.</p> <p>Samsung C&T develops and applies an improvement process for any shortcomings found in the human rights inspection to all of our business sites and partners with identified risks to improve the degree of human rights. In addition, after the application of the improvement process, the company enforces monitoring activities to make sure improvements are made through associated actions and discloses shortcomings and matters to be improved in a transparent manner to facilitate the improvement in the actual human rights at its business establishments.</p>
<p>Policies and guidelines related to human rights</p>	<p>We have reviewed and updated the following policy documents to ensure these policies include modern slavery is recognised and addressed with our people:</p> <ul style="list-style-type: none"> ▪ Samsung C&T Code of Conduct ▪ Prevention of Discrimination, Bullying and Harassment Policy ▪ Whistleblower Policy
<p>Risk assessment and improvement</p>	<p>We have continued to undertake the following actions to mitigate modern slavery risks:</p> <ul style="list-style-type: none"> ▪ reviewed existing and identify new policies, procedures and practices to better address modern slavery risks ▪ updated our Modern Slavery policy ▪ conducted training for all new staff and relevant policies to comply

	<ul style="list-style-type: none"> ▪ communicated with all contractors and suppliers ▪ include a Modern Slavery section in our employee handbook ▪ continued using a Modern Slavery questionnaire for new suppliers and reviewing, monitoring for existing suppliers ▪ include Modern Slavery awareness training within our induction process and reviewing, monitoring for existing suppliers
Risk register tracking	<p>We have continued to undertake risk mapping of our supply chain regarding modern slavery to include:</p> <ul style="list-style-type: none"> ▪ details of the external parties engaged ▪ the type of service performed ▪ the countries outside of Australia that goods are supplied <p>We have continued to address modern slavery risks with our supplier contracts by ensuring all our contracts contain the following clauses with regard to modern slavery:</p> <ul style="list-style-type: none"> ▪ commitments ▪ prohibition of Modern Slavery ▪ compliance statements ▪ disclosure and Audit ▪ rectification ▪ consequences of breach
External benchmarks	Our policies have been benchmarked against our joint venture partners to ensure we effectively focus on modern slavery risks and through external professional consultant.
Sustainable Procurement	We continue to be committed to our human rights, the equitable and fair treatment of our people and the environment to ensure sustainable development within each country in which we operate by partnering with the joint venture partners.
Internal risk management framework	We have adopted our international risk management framework to ensure we continue to have the correct systems and processes in place to identify, mitigate and prevent modern slavery practices in our business and through the engagement of our suppliers.
Mandatory on-site audits	We are required to perform mandatory on-site audits. Mandatory compliance items including a ban on child labour, guarantee a minimum wage, adherence to hours regulations and a ban on inhumane treatment in accordance with industrial instruments including modern awards, Enterprise Agreements and individual contracts.
Completion of Supplier and Business Partners survey and questionnaires	We have sought and received feedback from our suppliers to ensure that the measure we have in place, and individual employment contracts to address Modern Slavery risks are effective and to ensure our suppliers better understand their requirements regarding Modern Slavery via our Modern Slavery Questionnaire and audit process.
Grievance mechanisms	We have appointed a Whistleblower Protection Officer to receive and manage disclosures under the Whistleblower Policy. Employees can raise any concerns to the Whistleblower Protection Officer on a confidential basis. Further, we are committed to provide compulsory training to promote the operation of grievance hearing channel in the business site.

FutureScape

Going forward, Samsung C&T is committed to enhancing our Human Rights Risk Management by continuously reviewing and improving our risk assessment processes to identify and address modern slavery risks within our operations and supply chains. We will also measure the effectiveness of our risk management framework and policies. Our ongoing efforts include reviewing mid-term strategic directions and objectives, establishing KPIs in the Human Rights risk area, and developing strategic task implementation plans to eradicate modern slavery risks. Additionally, we will continue to conduct thorough due diligence on suppliers before engagement, which includes robust assessments of modern slavery risks. We will incorporate human rights and modern slavery commitments into contracting agreements with partners, suppliers and subcontractors. Furthermore, we will offer targeted training on modern slavery to relevant employees to enhance their understanding of modern slavery risks and the requirements of the legislation. We will keep abreast of industry developments and international best practices related to modern slavery.

Samsung C&T Group has been focusing on reinforcing the sustainability of the company with the aim of establishing a board-centred responsible management. In this reporting period, Samsung C&T planned to continue its efforts to improve operational levels while maintaining the direction of its existing mid-term strategy to strengthen sustainable management through the implementation of the responsible management led by the Board of Directors. We endeavour to identify, monitor, assess and mitigate the modern slavery risks without our business operations and suppliers through our global ESG strategy and framework. Samsung C&T Group will continue to manage key areas in Human Rights Risk Management dividing into governance, strategy, risk management and goals including its business operations in Australia.

Key issues	Governance	Strategy	Risk Management	Metrics and Targets
Human Rights Risk Management	<p>Establishment of a company-wide management system for human rights management</p> <ul style="list-style-type: none"> Board of Directors-ESG Committee: Deliberation and dissolution of key human rights management goals and operation plan Management: Establishment of human rights management strategy and plan, performance evaluation and actions taken Department in charge of ESG at company-wide and segment level: Task performance highlights and goal achievement level monitoring Segment human rights department: Development and implementation of work for human rights 	<p>Establishment of mid-term plan (2023~2025)</p> <ul style="list-style-type: none"> Selection of human rights and diversity as key areas through analysis on the stakeholder requirements and the company's operating level Establishment and operation of human rights risk reduction plan for each segment 	<p>Identification of human rights risk and actions taken</p> <ul style="list-style-type: none"> Identification of labor and human rights issues and vulnerable areas within business sites through inspection Establishment of mitigation action and monitoring of improvement activities in place at business sites where risks are found <p>Integrated company-wide risk management</p> <ul style="list-style-type: none"> Identification of 'labor and human rights risk' as a core risk and establishment of a response system centered on relevant business segment and risk management governance 	<p>Inspection rate of human rights for business sites</p> <p>2022 goals of 92% (Actual records of 93%)</p>
Ethical Corporate Culture	<p>Establishment of a company-wide management system for compliance</p> <ul style="list-style-type: none"> Board of Directors-ESG Committee: Deliberation and dissolution of compliance operation plan and activity results Compliance officer: Establishment of compliance strategy and plan, performance evaluation and actions taken Company-wide compliance team: Compliance inspection-training-voluntary activity implementation and goal achievement level monitoring Segment compliance department: Implementation of compliance activities 	<p>Establishment of compliance code of conduct and guide</p> <ul style="list-style-type: none"> Principles provided for the seven areas (integrity, fair trade, anti-corruption, information protection, employment and labor, subcontractors/ win-win cooperation, safety/environment/quality) Requiring all employees to sign a pledge to ensure compliance <p>Raising compliance awareness</p> <ul style="list-style-type: none"> Common trainings for employees and programs from executive officers Operation of Compliance Academy 	<p>Identification of compliance risk and actions taken</p> <ul style="list-style-type: none"> Compliance inspection executed and improvements conducted for all business sites every other year Operation of internal and external reporting system <p>Integrated company-wide risk management</p> <ul style="list-style-type: none"> Identification of 'risk of compliance with laws and ethics' as a core risk and establishment of a response system centered on relevant business segment and risk management governance 	<p>Ethics compliance self-diagnosis score</p> <p>2022 goals of 89 (Actual records of 90)</p>

Ethical Framework

In addressing and acknowledging modern slavery risks, Samsung C&T have the following ethical frameworks in place which govern our operations.

Global Core Values

As a member of the global Samsung group, our core values are as follows:

- People
- Excellence
- Change
- Integrity
- Co-prosperity

These core values, in conjunction with a rigorous code of conduct, are the cornerstone for the business decisions that we make.

Global Code of Conduct

The Samsung's group code of conduct sets clear expectations with respect to human rights.

These policy guidelines are supported by processes for the management of complaints and grievances including:

- Whistle-blower hotline;
- Pursuit of co-prosperity (where community, employees, country and humanity can prosper together); and
- Fair competition (complying with the laws and ethical standards of the countries and communities).

Samsung discloses its Global Code of Conduct ('Samsung Business Principles') to suppliers, customers, and other external stakeholders as well as to our employees through our ethics management website and provides a channel to report on any violation of ethical standards.

Consultation

During the reporting period, Samsung C&T consulted with Samsung C&T Engineering and Construction in Korea. We discussed details of the Modern Slavery Act 2018's reporting requirements and provided information regarding the actions we intend to take to address these requirements. This statement was prepared in consultation with our Board of Directors to support the delivery of our commitment to eliminate Modern Slavery risks from our entire operation and supply chains.

Principal Governing Body Approval

This Modern Slavery Statement 2023 was approved by the Board of Samsung C&T Corporation Branch in their capacity as principal governing body of Samsung C&T Corporation Branch for the purposes of the Commonwealth Modern Slavery Act 2018 on 30 June 2024.

Signature of Responsible Member

This Modern Slavery Statement 2023 for Samsung C&T Corporation was approved and signed by Mr. Daehyung Kim in his role as the Branch Manager of Samsung C&T Corporation Branch on behalf of the Board on 30 June 2024.



Daehyung Kim
Branch Manager of Samsung C&T Corporation Branch
30 June 2024

Annexure A

Mandatory Reporting Criterion	Reference in this statement
Identify the reporting entity	About This Report
Describe the reporting entity’s structure, operations and supply chains	About Samsung C&T Operations and Supply Chains
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Modern Slavery Risks
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Actions Taken To Assess and Address Modern Slavery Risks
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Measuring Effectiveness
Describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a joint statement, the entity giving the statement	Consultation Approval
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Our Commitment 2023 Calendar Year Review FutureScape Ethical Framework



OUR IMPACT

By working together to create harmony, we are ensuring a brighter future for the world and everyone in it.

Samsung C&T's Engineering & Construction Group is committed to fulfilling all its environmental and social responsibilities and to executing projects with the client's best interests in mind. We will continue to leverage our growing resources, expertise, and experience to make the world a better and more abundant place and help the human race reach new heights.

