



BG&E Group of Companies MODERN SLAVERY ACT STATEMENT FOR FINANCIAL YEAR 2022/2023

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

REPORTING ENTITY AND STRUCTURE

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

The reporting entity is BG&E Group Limited ACN 650 895 426, as the ultimate parent company of the BG&E Group of Companies.

In this statement, unless expressly mentioned otherwise, references to BG&E, BG&E Group, the Company, we, us and our, refer to BG&E Group Limited and its related bodies corporate as defined in section 50 of the *Corporations Act 2001* (Cth).

PURPOSE AND ACKNOWLEDGMENTS

The purpose of this statement is to describe the risk of modern slavery in our own operations and our supply chain for the period from 1 July 2022 to 30 June 2023 (the **Reporting Period**), actions taken by BG&E to assess and address the risks and how we evaluate effectiveness of these measures. The term 'modern slavery' as used in this statement refers to the definition in the Modern Slavery Act.

BG&E acknowledges its responsibilities in safeguarding human rights through ethical and sustainable business practices in accordance with the United Nations Guiding Principles on Business and Human Rights and applicable local laws.

Modern slavery includes slavery, servitude, debt bondage, human trafficking and forced labour. BG&E has a zero-tolerance approach to any form of modern slavery. We are committed to:

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

OUR BUSINESS OPERATIONS AND STRUCTURE

BG&E is united by a common purpose – we believe that truly great engineering takes curiosity, bravery and trust, and is the key to creating extraordinary built environments. We proudly foster working environments that reject bribery, corruption and unlawful acts, and celebrate inclusiveness and difference, and encourage innovation and creativity.

We are a public unlisted, employee-owned consulting engineering group of companies headquartered in Sydney, Australia, that employs over 800 staff, with related corporate entities operating from offices in the Middle East, New Zealand, Singapore, and the United Kingdom.

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

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



OUR SUPPLY CHAINS AND MODERN SLAVERY RISK

BG&E recognises that the risk of modern slavery has the potential to exist in its global operations, including:

- engineering professionals and support staff;
- across its network of global supply chains, including:
 - other professional service organisations and individuals who we work with to provide services to our clients, including architects, engineering and geotechnical consultants, planners, surveyors, digital service providers and other professional advisors;
 - suppliers of products and services to our corporate operations, including insurance, legal and financial advisors, software and technology providers, stationery and materials, catering services and ride sharing;
 - other companies or branches within the BG&E Group globally, including drafting design offices and administrative services in the Philippines; and
 - project suppliers, including the engagement of subconsultants and suppliers of products and materials to our facades business.

Notwithstanding that BG&E's business is in the construction industry, as it is primarily an engineering professional services organisation, the risks of Modern Slavery occurring within our business are low. However, we acknowledge that there may be risks of Modern Slavery within our supply chain arising primarily from:

- utilising services or delivering projects in developing countries;
- entry into emerging businesses where supply chains have not been adequately identified; and
- matters not within the control of BG&E, such as the failure of our other entities in our supply chain to comply with ethical and responsible business practices.

RISK MANAGEMENT AND DUE DILIGENCE

BG&E recognises that good corporate governance is crucial to the long-term success of the BG&E Group and has established a governance and risk management framework to oversee the financial and strategic decisions, assess the management of risks, including Modern Slavery. This framework includes:

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

The Board, Executive Leadership Team, SQRC, ESG and the RMG all operate under charters that require compliance with ethical behaviour and the overseeing of potential Modern Slavery risks within BG&E's operations.

The SQRC meets quarterly and is responsible for the oversight of BG&E's response to human rights, including the impact on BG&E's business, and provides advice and guidance to the Board on those matters.

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

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

Numerous internal policies and procedures have been established and implemented, including annual training, to ensure that we are addressing the potential risks of Modern Slavery within our supply chain and conducting business in an ethical and transparent manner. These include:



- **Anti-bribery and corruption** policy and practices.
- **Recruitment** policy and practices. We operate a robust recruitment policy, including conducting eligibility to work checks for all employees to safeguard against human trafficking or individuals forced to work against their will. Recruitment is typically conducted through registered labour agencies for the provision of professional staff.
- **Staff Employment Guide.** All employees can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. Our whistleblower policy has a dedicated hotline to raise anonymous complaints about unethical conduct.
- **Code of Business Conduct.** This code explains the way we behave as an organisation and how we expect our employees and suppliers to act, including identification of possible Modern Slavery risks. Our employees are required to undertake annual code of business conduct training.
- **Grievance and Dispute Resolution** and **Whistleblower** policies allow concerns to be raised, identified, and addressed.
- **Subconsultant Management Procedure.** This procedure describes the process on how we identify, appoint and manage our supply chain partners, and includes ensuring suppliers like subconsultants comply with Modern Slavery laws.

OUR PERFORMANCE AND FUTURE ACTIVITIES

2022/2023 Performance

BG&E is constantly improving its modern slavery practices and assessing its modern slavery risks, inclusive of our supply chain. Its objectives are to:

- Assess potential clients and suppliers for modern slavery risks before appointing them.
- Conduct risk assessments which identify actual or potential modern slavery risks.
- Enter transparent and formal contracts with suppliers.
- Require suppliers to comply with Modern Slavery legislation (and cascade those obligations through their supply chains).
- Include obligations in supplier contracts to act in accordance with the Modern Slavery Act.
- Provide appropriate compliance training to its staff on modern slavery obligations through its Safetrac program.
- Monitor compliance with the above throughout its business through consultation within its business and its internal systems, processes, and reporting requirements.

The Board is committed to reviewing its business model considering modern slavery risks.

BG&E is committed to monitoring and assessing the effectiveness of its actions, to detect and mitigate the risks of modern slavery in our operations and supply chain. BG&E measures the effectiveness of its Modern Slavery risk and how it is being managed through:

- Any reports from whistle blowers, relating to breaches of modern slavery obligations.

Evidence of these measures include:

- implementing additional compliance training through the SafeTrack system;
- establishing the ESG Committee;
- updating the BG&E anti-bribery and corruption policy;
- updating its subconsultant agreements, including specific modern slavery obligations;
- exiting its business in the Middle East; and
- limiting its specification of products and materials to those manufactured by businesses who are not in breach of modern slavery obligations.

In addition to BG&E's latest initiatives, in the 2022/2023 financial year, BG&E has continued to educate and support its employees by partnering with Safetrac to provide business specific training to its employees. Training included delivering e-learning modules and practical guidance relating to ethical business practices designed to ensure BG&E's employees understand their role and responsibility within the business, including



identifying modern slavery practices within our workplace and what our employees can do to protect and safeguard human rights.

BG&E revised its grievance mechanisms to identify and escalate issues that may have arisen as set out in our Whistleblower Policy. While it is BG&E's expectation that our contractors will have their own grievance procedure in place to identify any violations of modern slavery this policy applies to, and supports all employees, officers and contractors of the BG&E Group. BG&E encourages its employees, officers and contractors to voice any concerns they have without fear of retribution and with full confidentiality.

FINANCIAL YEAR 2023/2024 COMMITMENTS

BG&E continues to remain committed to identifying, monitoring and improving its approach to Modern Slavery risks across its supply chains. Over the next 12 months, it intends on undertaking the following:

- Continue monitoring of external environments, emerging business in developing countries and supply chain risk generally across its operations. This will be incorporated into our proposed internal audit schedule over 2024.
- Updating policies and procedures to accommodate any changes in legislative requirements.
- Evaluate and report on KPIs related to ethical conduct and supply chain risk.
- Maintain annual employee training on ethical conduct and supply chain risk.
- Adapt and fully implement subcontractor systems including updating the subcontractor register, implementation of a modern slavery registration for subcontractors, and continually reviewing BG&E's subcontract terms.

CONTACTS

Please contact Rick Kreeck, Chair of SQRC or Adam Scott, General Counsel, details provided below:

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APPROVAL FOR THIS STATEMENT

This statement was approved by the Board of Directors on 13 December 2023.



Peter Watson
BG&E Group Chairperson



Frank Cerra
BG&E Managing Director

