



# Modern Slavery Statement

## 2023 - 2024

Mott MacDonald Australia Pty Ltd – ABN 13 134 120 353

This statement has been developed to comply with the legal requirement as stated in the Australian Modern Slavery Act 2018 (Cth) (the 'Act'). It has been approved by the Mott MacDonald Australia Pty Ltd ('Mott MacDonald Australia') board of directors and signed by a responsible member in accordance with the Act.

### Structure

Mott MacDonald Australia's registered office is Mezzanine Level 22 King William Street, Adelaide SA 5000. The company operates in all States and Territories in Australia as well as in other jurisdictions, and directly employs approximately 1,279 people in Australia.

Mott MacDonald Australia is a wholly owned subsidiary of Mott MacDonald Group Limited, its ultimate parent company. The Mott MacDonald Group is made up of 145 companies and operates in many countries. For all its projects, in every country it is committed to respect all the people we interface with and to treat them fairly. Mott MacDonald Australia actively engages and consults with the Mott MacDonald Group to develop and update this statement and discuss the reporting obligations Mott MacDonald Australia has under the Act. However, Mott MacDonald Australia does not own or control any

other entities and therefore consultation under section 16 (1)(f) of the Act is not applicable.

Mott MacDonald Group Limited issues a separate Slavery and human trafficking statement in accordance with Section 54 of the UK Modern Slavery Act 2015, which is available on the Mott MacDonald Group website. The Mott MacDonald Group rejects modern slavery in all its forms, including servitude, forced or compulsory labour, child labour and human trafficking.

The Mott MacDonald Group operates globally with one corporate set of policies, directives and requirements through a common quality management system that is published on an online system known as STEP. Through this approach, all colleagues of Mott MacDonald Australia are required to comply with a high global standard of Modern Slavery compliance, in collaboration with national legislation.

## Operation

The Mott MacDonald Group is a global engineering, management and development consultancy. Our vision and mission are underpinned by our PRIDE values, and we work with businesses to:

- Solve some of the world's most urgent social, environmental and economic challenges
- Help governments and businesses plan, deliver and sustain their strategic goals
- Respond to humanitarian and natural emergencies
- Improve people's lives

The Mott MacDonald Group operates in many sectors, with expertise in buildings, communications, defence, education, environment, health, industry, mining, oil and gas, power, transport, urban development, water, wastewater and more. Our core skills include planning, studies and design, project finance, technical advisory services, project and programme management and management consultancy.

Mott MacDonald Australia has a strong presence in the sectors of transport, advisory, built environment, defence, water, energy and education, in Australia.

## Supply Chain

Mott MacDonald Australia's supply chain comprises the following:

- Partner professional services organisations, who work with us to provide clients with services, these include architects, financial advisors and other infrastructure-focused consultancies.
- Organisations providing resources or services to support the delivery of our projects, these include surveyors, specialist labour suppliers and local support firms.
- Organisations providing resources or services to support the delivery of our business, such as suppliers of personal protective equipment, office supplies and equipment, IT equipment, catering organisations, facilities management ("FM"), office cleaning, accommodation and travel.

These groups can be further subdivided into labour that is:

- Directly employed

- Sub-contracted, where we employ a service agency who is the contracting party
- Associated labour, whereby our joint venture (JV) partners are the contracting party, or they sub-contract to agencies to provide labour

Mott MacDonald Australia recognise our responsibilities to ensure that our supply chain complies with International Labour Organisation conventions. We are committed to achieving the ethical standards we set for ourselves with our supply chain and continue to work towards full transparency.

## Risk Assessment

The value Mott MacDonald Australia brings is recognised by clients and, as a result, it is accepted that we charge fair rates for the work we undertake and that we pay employees and suppliers fairly. Our staff are mainly permanently employed, and the risks associated with slavery and human trafficking of our direct employees are generally low. Our professional staff have tertiary education, are often members of professional organisations and command significant levels of compensation in line with market norms. Our agency supplied labour is generally for skilled or professional roles, reducing the risk of modern slavery.

Key areas of risk for us are:

- Low wage jobs, such as office cleaners and support staff.
- Our commodity services supply chain, where unskilled labour is prevalent.
- Our commodity purchasing supply chain.

These risks are managed through our employment and procurement policies and through our supplier evaluation process. As Mott MacDonald Group is an employee-owned company this frees us to choose the work we take on and focus on the issues that are important to our clients – and us. We're not in business to make the most profit for external shareholders: we want to do a great job for our clients, our communities and our people. We insist on the highest standards of integrity in all we do and are certified to the international standard ISO 37001. It is worth noting that, whilst we interface closely with the construction industry, Mott MacDonald Australia does not undertake traditional construction activities.

## Risk Mitigation and Remediation

In relation to slavery and human trafficking in our business and supply chain, Mott MacDonald Australia:

- Employ individuals through an interview process, whether full/part-time employees or contract staff. This process seeks to confirm individuals share our corporate values, have a right to be employed, are not breaching immigration regulations, have the necessary competence and aptitude for the position and are applying to work for us through their own free will.
- Evaluate potential and existing suppliers using a standard questionnaire to identify competence and compliance with our values and standards, and to ensure they are addressing slavery and human trafficking risks. This assessment is repeated periodically and is supported by our procurement policy. We are currently reviewing our global approach to procurement to identify best practice and strengthen this area in the future.

### Due diligence

Due diligence on clients and suppliers is undertaken through combining our previous experience of working with the organisation, our local knowledge of them and the information surfaced through the Exiger Insight3PM service. This consists of an initial web-based search on a company and its affiliates, with a more comprehensive review available if needed.

We cross reference information from these sources before seeking to contract with a supplier. We have an established global list of suppliers, with a procedure to check compliance of our tier one suppliers. This is to enable us to interrogate and verify that we hold up-to-date and accurate information, and to check suppliers comply with the requirements in our policies on Modern Slavery, ethics and anti-bribery, and divulge essential information to us.

### Contracting

Our business management systems ensure that new suppliers are verified for compliance to our policies before they can be contracted to supply goods or services. The Mott MacDonald Group has aligned procurement contracts across the global business to detail the requirements in our policy against slavery and human trafficking. This requires that the purchase of consumables for our office facilities or for projects, and of the provision of technical services by suppliers to be subject to conditions of contract explaining the requirements for legal compliance to Modern

Slavery legislation and antibribery legislation, as well as performance requirements.

### Training

An on-line training course is available for all Mott MacDonald Australia staff to learn about the risks of modern slavery and its possible effects on people across the world, how to spot possible abuse of the law, and how to report it within the company. We train our staff on ethics and compliance with our values, directives and processes. We make use of dilemmas to help staff more fully understand some of the issues they might encounter. These are scenarios ending with a question to promote group discussion of topics and to help staff think through what they might do in a specific situation. We also provide training on people management and communications skills and these are directly aligned with our PRIDE values. This creates a strong culture of tolerance of others, transparency in decision-making and mutual respect, and supports our training on Modern Slavery and is available to all staff.

In 2022, the Mott MacDonald Group made updates to mandatory safety training to include modern slavery for key groups of staff who work outside the office. In 2023 a further training needs analysis will be undertaken to identify additional roles which would benefit from enhanced training. We expect this to be staff in roles such as supplier management, human resources, office management, or staff who are based on our client's construction sites.

### Our Policies

Mott MacDonald Australia's approach to respecting people and our suppliers is embedded in the Mott MacDonald Group's policies on equality, diversity and inclusion, ethics, human resources, risk treatment and management, procurement, safeguarding and social responsibility, in addition to our policy on slavery and human trafficking and the PRIDE values. These policies are developed and approved by the Mott MacDonald Group and are applicable to Mott MacDonald Australia and relevant for our work against Modern Slavery.

All documents, including our policies and Our Code, are available at [www.mottmac.com](http://www.mottmac.com).

### Our Code – Delivering with PRIDE

Our Code- Delivering with PRIDE contains our standards and expectations for all Mott MacDonald Group staff on modern slavery and human rights. All staff complete training on Our

Code and certify that they will comply with its provisions. Our Code is available to all Mott MacDonald Australia suppliers and on the Mott MacDonald Group external website to highlight our desire to work only with those who can meet our standards and expectations, including on modern slavery and human rights. Our Code helps all those who work for us, or with us, to improve their understanding of Modern Slavery and details how to raise concerns related to this.

## STEP

STEP is our fully integrated Business Management System (BMS), covering every aspect of our business. STEP is an online system, to which all staff have access, providing guidance, tools and support to ensure the highest standards and ethical behaviour, throughout our businesses and supply chains. Modern slavery processes on STEP will continue to be reviewed in 2023 for further development.

## Speaking up

In the event that anyone connected to Mott MacDonald Australia's business feels that one of our policies or Our Code has been contravened, the Speak Up helpline is a comprehensive, confidential internet and telephone-based reporting tool provided and managed by an independent third party (Navex Global – EthicsPoint). Our processes for handling reports are documented as part of our business management system. The service is promoted through campaigns within the company, including via posters in our offices. It is accessible to anyone, including all tiers of our supply chain and FM staff in all offices. Reports are treated confidentially and can be raised anonymously where local legislation allows.

During 2022 the Mott MacDonald Group, including Mott MacDonald Australia, did not receive any reports (internal or via Speak Up) related to modern slavery or human trafficking. To ensure that low number of reports are not due to lack of understanding of Speak Up, we are continuing to promote our reporting mechanisms, both as part of Our Code and wider communications to the business. Over the next year we will especially promote this where we have a site presence and to our FM staff.

## Effectiveness of our approach

The risk of slavery and human trafficking in Mott MacDonald Australia's business is deemed to be low. Therefore, our focus is on monitoring the performance of our suppliers in supporting us to meet our policy commitments. We also monitor

our own compliance with our employment and procurement processes. In addition, we are audited around the world by third party organisations both for compliance with our internal business processes and with quality standards.

## Our progress in 2022

Since the previous reporting period the Mott MacDonald Group undertook several activities as part of the Group's global commitment to modern slavery and our development, including:

- Working with Slave Free Alliance to obtain advice on our process and continue our journey of continual improvement. Slave-Free Alliance is an international social enterprise, wholly owned by global anti-slavery charity Hope for Justice. It started in 2018 and has a track record of supporting organisations of all sizes and from many sectors to build their resilience to modern slavery and labour exploitation. A gap analysis is planned for Q1 2023 which will identify recommendations for ongoing improvements to our approach.
- Working with Control Risks Group to assess the risk of modern slavery in some countries that the Mott MacDonald Group work. Assessments carried out for higher risk countries. Information sought from stakeholders to obtain a tailored assessment. The first assessment has been positively received by stakeholders.
- Received our first positive intervention (a member of staff visiting a client site took positive action against an instance of child labour in a client's contractor organisation) and used this as a case study presented to internal audiences, to begin a conversation with the wider business on modern slavery and how they might encounter it and the importance of our actions.
- Holding our first Mott MacDonald Group Connected Thinking Forum, where different parts of the business with a focus on positive social outcomes including modern slavery were represented. We discussed how we as a group might align to ensure that we get the best outcomes for people and planet. We identified staff who would be on the front line of modern slavery issues and updated the mandatory training to reflect this.

# Mott MacDonald Group - Modern Slavery Development Plan

## 2022 Target

## Progress against targets

**Improving the guidance available for our project management and procurement staff on modern slavery risks and the control measures that need to be put in place to minimise the risk of modern slavery instances in our supply chains.**

Developed a modern slavery learning moment, which was widely circulated to staff, management, territory managers and safety managers for onwards transmission. We added a category to our health and safety positive intervention reporting system to allow staff to record interventions made. We will continue to develop this guidance into 2023.

**Status: Complete**

**Improving the modern slavery training we have in place for our frontline staff, specifically working on training modules for our site-based staff and those who visit projects who are most likely to encounter modern slavery in the course of their work.**

Added information on modern slavery, how to spot the signs of someone trapped in modern slavery and what to do to our mandatory training courses for staff who work outside the office and for those who work on construction sites

**Status: Complete**

**Provide additional, more developed training to our safety staff and others to assist them in assessing modern slavery risk and discussing control measures with the staff in their business units.**

We did not have the internal expertise to fully carry this out in 2022, however we expect to progress this in 2023 with the assistance of Slave Free Alliance.

**Status: ongoing**

**Helping to identify what good looks like for procurement specialists to more effectively assess suppliers**

The results of the work done so far were sent to the internal ethics and compliance team for their review as part of the improvement of our due diligence processes.

**Status: partially complete**

**Implement the findings from the due diligence review carried out in 2021, which will include ESG due diligence**

Input information on modern slavery due diligence to the project which commenced in Q4 2022 and continues into 2023.

**Status: Partially complete**

**Developing and promoting more modern slavery learning resources as part of an ongoing internal interactive learning programme**

We produced a modern slavery learning moment, based around an incident seen by one of our staff at a client site. We promoted existing resources and key contacts to staff as part of the roll out of the learning moment.

**Status: Complete**

**Join an anti-slavery NGO to greater increase our capacity to make changes inside our organisation and in wider society**

During late 2022 we partnered with Slave Free Alliance, part of Hope for Justice.

**Status: Complete**

**Identify and prioritise gaps in our modern slavery risk management framework against industry good practice**

In late 2022, we requested Slave Free Alliance undertake a gap analysis of our systems. This is planned for early 2023, with the actions resulting forming part of our 2023 action plan.

**Status: Not yet commenced**

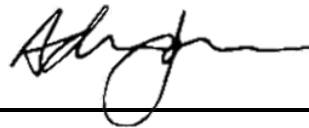
## Plans for future Improvement

Mott MacDonald Australia will continue to undertake a review of our approach to modern slavery and human trafficking. We will respond to evaluations of our approach and look forward to being able to identify opportunities for improvement. The Mott MacDonald Group have identified the following modern slavery priorities for 2023, which Mott MacDonald Australia supports and will contribute to:

- Complete planned gap analysis by Slave Free Alliance and commence work on the expected action plan generated.
- Develop a clear suite of posters to help staff based on site know what to look for and what action to take.
- Improvements to due diligence process, increase inclusion of modern slavery as part of the due diligence improvement project happening company wide.
- Increase coverage of modern slavery issues in supplier performance assessments.
- Develop our bid response library and material for client conversations, so that staff can use this to help them develop their knowledge and engage in meaningful conversations with clients as to how we can move forward together.
- Identify senior champions around the business to promote and support the modern slavery agenda in all our regions.
- Continue training needs analysis and arrange briefings and training for key staff which will include how to best respond to a reported incident to have a consistent robust approach.

In addition to publishing this statement on the online public register we will also publish this statement on the Mott MacDonald Australia website and associated websites to promote our commitment to this agenda.

The Mott MacDonald Australia Modern Slavery Statement is approved by the Mott MacDonald Australia Pty Ltd board of directors and signed by:



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**Adrian Jones**  
Managing Director

22 June 2023