

Modern Slavery Statement

1 January 2021 to 31 December 2021



We're redefining exceptional

Through our specialist expertise, we're challenging boundaries to deliver advanced infrastructure solutions.

Contents

Contents	1
Reporting entity	3
Approval	3
Our structure, operations and supply chain	4
Organisational structure	4
What we do	4
Our supply chain	5
Identifying and taking action to address our risks of modern slavery	7
Modern Slavery Risk Management Framework	7
Identification of modern slavery risks in our operations and supply chain	7
Our operations	7
Our supply chains	8
Enhanced due diligence	9
Governance and training	13
Governance	13
Policies	13
Grievance mechanism	14
Training	15
Assessing the effectiveness of our actions	16
Consultation	17
Our values	17
Appendix A	18

Reporting entity

This modern slavery statement (**Statement**) has been published in accordance with the *Modern Slavery Act 2018 (Cth)* (**MAS or Act**) and is a statement made on behalf of **SMEC International Pty Ltd** with a registered address of Level 5, 20 Berry Street, North Sydney, NSW 2060 (“**SMEC**”).

This Statement describes the risks of modern slavery in SMEC’s operations and supply chains, and outlines the actions taken to address those risks for financial year ending 31 December 2021. This is SMEC’s second Statement.

SMEC controls:

In North & South East Asia: ECCL Singapore Pte Ltd, SMEC Asia Ltd., SMEC International (Malaysia Sdn Bhd), SMEC Macau Engineering Consultancy Limited, SMEC Myanmar Company Limited, SMEC Philippines Inc, SMEC PNG Ltd, SMEC Vietnam JSC, Global Maintenance Consulting Singapore Pte Ltd, and SMEC Mongolia LLC

In Africa: Energy Holding Ltd, SMEC International (Africa) Pty Ltd, SMEC (Kenya) Limited, SMEC Nigeria Limited, SMEC South Africa Pty Ltd, SMEC (Tanzania) Limited, SMEC Uganda Limited, Soillab Pty Ltd, VKE Namibia Consulting Engineers Pty Ltd, VKE Botswana Pty Ltd, and Vincpro (Pty) Ltd

In South Asia Central Asia: ACE Consultants Ltd, SMEC Oil & Gas (Pvt) Ltd, Engineering General Consultants (EGC) Ltd, SMEC Rail India Pvt Ltd, Ocyana Consultants Pvt Ltd, SMEC Central Asia LLP, SMEC Georgia LLC, SMEC India PVT Ltd, SMEC Bangladesh and SMEC Pakistan Ltd

In the Americas: SMEC Servicios de Ingenieria de Mexico, and SMEC (Chile) Limitada

Other: SMEC PNG Ltd, South Asia Middle East Management Company LLC and Engineering Consultants Underwriters Ltd

SMEC has investments in, but does not control:

PT SMEC Denka Indonesia, Himalayan Green Energy Private Limited, LDLC Properties (Pty Ltd), Soilco Materials Investigations (pty) Limited, SMEC (Malaysia) Sdn Bhd, VKE Infrastructure Services (Pty) Limited, and TT Energy Private Ltd

Approval

This Statement is made in accordance with s.14 of the Modern Slavery Act (Cth) for the financial year ended 31 December 2021 and approved by the board of directors of

SMEC International Pty Ltd



Hari Poologasundram
CEO SMEC & CEO International Surbana Jurong

Our structure, operations and supply chain

Organisational structure

SMEC is a wholly owned subsidiary of SMEC Holdings Pty Ltd¹, which in turn is a wholly owned subsidiary of Surbana Jurong (Holdings) Australia Pty Ltd.

SMEC oversees the delivery of its services internationally through entities that it controls or by way of branch, representative or project offices.

SMEC has 3,578 employees across 42 offices in 35 countries. 93% of SMEC employees are permanent, with the remaining small percentage being employed on either a casual basis or fixed-term contracts.

“SMEC conducts its business in a manner consistent with internationally proclaimed human rights, including all workers’ fundamental right to be treated with dignity and respect, and live a life of freedom and opportunity.”

What we do

We provide high quality advisory and consulting expertise across the project lifecycle, from initial concept, feasibility, planning and design through to construction, commissioning, and operation and maintenance.

Infrastructure

We are specialists in delivering advanced engineering solutions for transport and energy infrastructure projects. SMEC is also recognised globally for technical and service excellence across the full spectrum of infrastructure sectors, including waste, water, resources and environment.

Urban

With expertise in civil, structural and building services engineering design, we provide solutions for residential, commercial, industrial, healthcare and hospitality building projects around the world. Our experience extends from low density urban land developments, through to high-density, high-rise projects for public and private sector clients.

Managed Services

Our integrated management services extend to facilities, development, project and asset management, as well as social, governance and advisory services. Combining detailed advisory with innovative technologies, we keep projects on schedule, reduce technical risks, meet budget requirements and ensure compliance with relevant regulations, quality standards, construction permits and insurance guidelines.

¹ SMEC Holdings Pty Ltd publishes a separate statement as a reporting entity. Please refer to SMEC Holding’s statement for further information.

Our supply chain

Our supply chain remains substantially similar to the previous reporting period, although our understanding of our supply chain is improving.

Our supply chain consists of goods and services that support our consulting business. It can be broadly split into two categories:

Project services

The engagement of consultants and contractors to provide sub-consultancy services which support SMEC in the provision of its consulting and advisory services to its clients.

Hire of equipment (if necessary) in order to perform its services.

Corporate Services

The purchase or hire /leasing of goods and services for the day-to-day running of SMEC's business and its offices, including:



Rental of office space



Facilities, including cleaning, maintenance and security



Office and other equipment (purchase and hire)



ICT equipment



Advertising, marketing, sponsorships



Professional services, including memberships, recruitment and training



Travel, accommodation and hospitality



Personal protective equipment

SMEC has direct suppliers in each of the countries from which it operates, as well as suppliers in other jurisdictions. Of these 35 countries, a number are recognised by the *Global Slavery Index 2018* as having a higher perceived risk of modern slavery.

We also recognise that some or part of our corporate services goods are manufactured or sourced from overseas, including from countries that have a higher perceived risk of modern slavery.



Identifying and taking action to address our risks of modern slavery

Modern slavery risk management framework

In order to continue to effectively identify, assess and address our risks of modern slavery within our operations and supply chains, during the reporting period SMEC implemented a modern slavery risk management framework, based on the following approach



1. Design and implement a modern slavery management framework
2. Risk assessment and conduct due diligence on the modern slavery risks
3. Adopt strategies to address risks identified
4. Develop and implement appropriate remediation measures
5. Monitor and review effectiveness of the risk management framework
6. Establish appropriate mechanisms for internal and external reporting

Identification of modern slavery risks in our operations and supply chain

SMEC continues to develop its understanding of modern slavery risks in its operations and supply chains by building on its initial risk assessment which helped categorise and map SMEC's supply chain.

SMEC's operations and supply chain are categorised by the type of goods or services provided assessed against the geography in which such goods or services are provided. Consideration is also given to vulnerable populations and / or organisations with business models structured around high-risk practices.

Our operations

We provide engineering, advisory and consulting services, which generally have a lower perceived risk of modern slavery. We do not directly produce, manufacture, or provide services or goods which are identified as high-risk.

A high majority of our employees are permanent staff with only a small percentage (around 6%) of individuals being employed on a casual basis or from a labour hire service. All employees have employment terms and conditions set out in an employment contract, with regular performance reviews and interactions with management.

Despite operating in high risk jurisdictions, given the core services that we provide and the nature of our workforce, the risk of modern slavery occurring within our operations is generally low.

Our supply chains

As noted above, our supply chain is generally split in to two categories:

- project services; and
- corporate services.

Project Services



In the previous reporting period, we noted that the risk mapping process identified a large significant expenditure allocated to subconsultants but that the supplier data used for the risk mapping was not strong enough to determine the types of services provided. We identified that this, in turn, may correlate to a higher risk of modern slavery.

In the current reporting period, we have developed a better understanding of our subconsultants and we are pleased to report that we consider the risk of modern slavery within our project services category as also low. Such subconsultants provide engineering, advisory, and / or consulting services and the supply chain is not extensive (with the majority of subconsultants being the end of the chain).

We acknowledge that there may be a higher perceived risk of modern slavery in relation to the hire of equipment used to provide our services; an area which we endeavour to explore further.

Corporate Services

The more prevalent risk of modern slavery sits within the higher risk categories within SMEC's corporate services supply chain.

In the previous reporting period, SMEC identified the more salient risks of modern slavery may be found in the:



Facilities Management

- Cleaning
- Maintenance services
- Security

of its offices;



Office equipment suppliers;



Recruitment and labour hire suppliers; and



Accommodation, such as hotels

In developing its risk assessment, SMEC has also identified risk of modern slavery may be present in:



Outsourcing administrative functions

SMEC outsources some of its administrative services to an overseas office located in the Philippines. Whilst this entity is a related company and employees are subject to the same policies as SMEC employees, SMEC recognises that, given the nature of the work force and the risk attributed to the geographical location of the office (as noted in the *Global Slavery Index 2018*), more targeted information is required surrounding the recruitment practices and recruitment firms used.



Purchase / hire of ICT equipment

Computers, laptops and other ICT equipment are integral to the provisions of services and SMEC acknowledges the possible modern slavery risks presented within the manufacturing and sourcing of raw materials used in our everyday technology goods.



Marketing and merchandise

During the previous reporting periods, in particular due to COVID-19 restrictions, SMEC's expenditure in relation to branded merchandise has reduced. However, we recognise that the procurement of branded merchandise presents possible modern slavery risks depending on the original source of the merchandise.

Enhanced due diligence

During the reporting period, SMEC took a risk-based approach to the undertaking of enhanced due diligence, focusing efforts on those goods or services with salient modern slavery risk.

SMEC focused its efforts in developing a deeper understanding of its supply chains with relation to:

- facilities Management
- recruitment and labour hire in Georgia; and
- accommodation (hotels) in India

Supplier questionnaires

In undertaking the due diligence, SMEC created questionnaires which were issued to its higher risk suppliers with a view to providing us with a better understanding of their:

- processes and procedures with respect to dealing with human rights and / or modern slavery;
- visibility into its supply chain; and
- employment conditions.

Ancillary questionnaires were also created targeting

- origin of goods or services;
- relevant accreditations (such as Ethical Clothing Australia for garments);
- the level of audits and assessments undertaken of their supply chain; and
- further details pertaining to the investigation and remediation of modern slavery / human rights abuses or non-compliances.

Facilities management

The general maintenance and cleaning of SMEC's offices and facilities are generally categorised as either:



direct engagement; or



indirect engagement through the building's property manager.

Each of SMEC's offices is managed slightly differently depending on the level of facilities management provided by the property managers in the respective offices. In some offices, some services such as office cleaning is procured directly by SMEC, whereas the cleaning of communal areas is procured by the property manager. The same is said for maintenance.

We recognise that there multiple tiers in the supply chain of such services may be present and with visibility being reduced where services are procured by a third party such as a property manager. Where SMEC's degree of involvement with the supplier is limited, we are reliant on information provided by the property managers. We are exploring how best to obtain meaningful information from the second and third tier contractors.

Visibility to the workers providing the facilities management services has also been limited given the extensive work from home mandates as a result of COVID-19. We recognise that such mandates may have impacted the workers providing these services.

During the reporting period, we focused on the facilities management of our offices in Kazakhstan. Despite having no obligations to report under the MSA and having little to no knowledge of MSA requirements, we were pleased with the positive engagement we received from the property manager. We will continue to work with the property manager to better understand the second and third tier contractors.

During the next reporting period, SMEC will expand its engagement with other suppliers.

It was also acknowledged that the workers providing such services within SMEC's offices may not be aware of SMEC's grievance mechanisms because they are not direct suppliers or employees of SMEC. SMEC will implement a process for such individuals to access SMEC's grievance mechanism.

In doing so, we acknowledge the possible language barriers of the workers. SMEC's language for business is English, but for many workers, English is not their first language.

Recruitment

SMEC recognises that a higher risk of modern slavery exists where recruitment and labour hire suppliers are supplying low skilled or migrant labour, especially in countries with a high prevalence of modern slavery.

During the reporting period, SMEC explored the recruitment process of its overseas employees.

We found that generally all recruitment is undertaken in-house, with the utilisation of recruiters being reserved for specialised roles or roles that SMEC has been unable to fulfil directly. These recruiters tend to be specialised recruiters operating out of jurisdictions such as the UK.

Engagement by our recruiters was positive, with 100% of recruiters holding internal integrity policies and procedures.

Given that the majority of SMEC's employees are highly skilled, along with the method of recruitment used by SMEC, we have downgraded the risk associated to recruitment or labour hire of our employees to 'low'.

We do, however, acknowledge that recruitment or labour hire of basic admin or

Case Study

SMEC recruited 12 employees in Georgia during the reporting period. Of those 12 employees:

- All (100%) held at least Bachelor's degrees
- 8 (66.67%) held master's degrees; and
- 1 (8.34%) held a PHD
- SMEC directly recruited all the individuals
- Recruitment firms are utilised only for specialised roles and / or if SMEC is unable to successfully recruit candidates directly.

other low skilled roles in countries with a higher prevalence of modern slavery may attract a higher risk.

SMEC will endeavour to implement a process to identify any high-risk recruitment or labour hire practices within its operations.



"SMEC expects its suppliers of goods and services to uphold high standards of human rights and address risks of modern slavery within their own operations and supply chains."

Accommodation (Hotels)

In the provision of our services, employees may on occasion utilise accommodation whilst traveling for work. Such travel may be national or international.

We recognise that there is a high risk of exploitation within the hotel industry. It lends itself to the employment of a vulnerable workforce, with many migrant workers. It has complex supply chains with limited visibility. In addition, given the privacy that hotels offer, they may unwittingly lend themselves to other human rights abuses.

SMEC hosts a list of preferred hotels in each of the regions or cities that it operates. Booking of accommodation is generally undertaken centrally via an online booking request form. The hotels used are a mixture of independent hotels or global branded hotels.

SMEC acknowledges its visibility into the extensive supply chains of hotel operators is limited.

To assist tackle modern slavery in the hotel industry, SMEC has updated its mandatory online training to include examples of modern slavery and how it might arise within the hotel industry.

In the reporting period, we focused its enhanced due diligence on its hotels in India, across Delhi, Bangalore, and Chennai.

In undertaking the due diligence, we utilised both supplier questionnaires and online research. We found that many of the hotels provided useful information online, but we recognise that this may not correlate to what happens in practice.

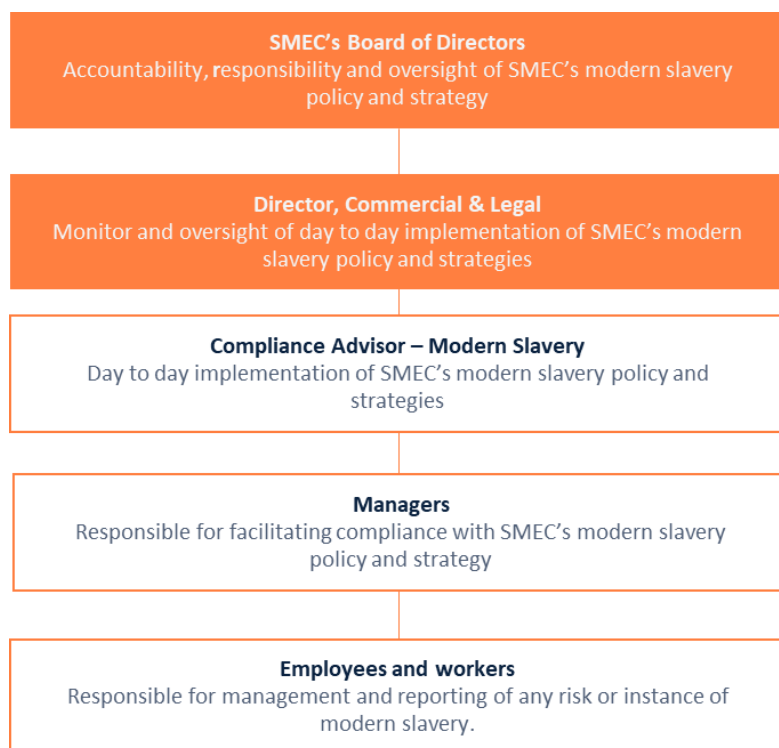
75% responded to the supplier questionnaires issued. The majority stated that they have policies or procedures to help mitigate modern slavery risks and / or human rights abuses, with one international hotel provider stating it has mapped its entire supply chain. All hotels stated employees were free to raise grievances.

SMEC acknowledges that its leverage or influence over hotels is relatively small. Given the complexities and extensiveness of the supply chain, SMEC has limited resources to undertake significant further due diligence into second and third level suppliers or undertake audits in relation to pay, recruitment practices or living arrangements.

In consideration of this, employees are encouraged to make a report if they suspect modern slavery or human rights abuses are taking place in the hotel they are staying at. We have also updated the mandatory online training module to include examples of modern slavery and how it might arise within the hotel industry.

Governance and Training

Governance



SMEC’s board of directors has ultimate responsibility and accountability for managing the modern slavery risks. They are supported by other functions in the business with a responsibility on all our employees to manage and report risk or instances of modern slavery.

During the reporting period, SMEC recruited a dedicated resource tasked with the day to day implementation of SMEC’s modern slavery policy and strategies: Compliance Advisor – Modern Slavery.

Policies

One of our core values is integrity. We act responsibly and conduct our business with the highest of ethical standards, accountability and transparency. SMEC has a suite of policies and procedures which articulate our values and expectations. In relation to the identification, prevention and mitigation of modern slavery risks and human rights abuses, SMEC has the following key policies and procedures.

Code of Conduct	Establishes a common understanding of the standards of behaviour expected of all SMEC employees and is applicable to the suppliers / third parties it engages
Modern Slavery Policy	Sets out SMEC’s commitment to addressing risks of modern slavery within its operations and supply chain
Child Protection Policy	Provide guiding principles in instances that SMEC’s services brings employees in contact with children
Business Integrity Policy	Outlines a range of requirements which are designed to reinforce the standards of behaviour to combat risks of fraud, bribery, corruption and other illegal, dishonest, unfair or unethical practices
Whistleblowing Procedure	Sets out the associated protections for whistleblowers
Modern Slavery Investigation Procedure	Provides victims of business related adverse human rights impacts with access to effective remedy and sets out generally how SMEC will investigate grievances and allegations related to modern slavery within its operations or supply chain.
Corporate Social Responsibility Policy	Ensures that SMEC is a good corporate citizen and that employees adopt corporate social considerations in their day to day work
Suppliers Code of Conduct	Sets out the ethical, social and environmental standards of conduct expected from our suppliers
Procurement policy	Sets out SMEC’s approach to procurement of goods and services
Purchasing Procedure	Sets out how SMEC manages the procurement of goods and services

Grievance mechanism

Investigation Officer / Disclosure Officer	Complainant	Subject Expert, Other Business Units, Suppliers	Senior Management	Third Party
1. Receive the grievance / allegation.	✓			
2. Acknowledge receipt to the complainant. Continue communication with complainant throughout investigation	✓			
3. Does the grievance / allegation meet the scope of the mechanism				
a. If yes, inform the complainant of the next steps	✓			
b. If no, inform the complainant of the outcome and reason for rejection	✓			
Consider providing additional support to help the complainant meet information requirements, or refer to another appropriate mechanism for raising this grievance / allegation, if applicable (either internally or externally)	✓			✓
4. Follow internal Escalation Protocol attached at Schedule 1 to notify senior management of allegation and next steps			✓	
5. Evaluate and investigate grievance / allegation.				
- Consider SMEC's degree of involvement [see Schedule 2] and apply following steps as applicable and / or consider supplier's investigation procedure		✓	✓	
- Engage with relevant internal teams as applicable (such as those responsible for procurement, human resources, legal.				
- Engage external experts if applicable (such as NGO's, community groups, local government, and / or unions				
- Engage with suppliers				
6. Develop resolution in collaboration with the complainant / victim	✓		✓	✓
7. Complainant / victim and SMEC formally agree upon resolution (if complainant / victim does not accept resolution go to recourse or appeal using management and / or a third party)	✓			
8. Implement resolution	✓	✓		
9. Monitor implementation of agreed remedy and measure the effectiveness of the remedy (or seek updates from suppliers where suppliers have implemented the resolution)				
10. Close grievance and notify senior management of the outcome			✓	
11. Integrate feedback and learnings from the process into the grievance mechanism and modern slavery risk management practices within SMEC.		✓	✓	

 Indicates possible engagement
  Indicates engagement

Adapted from: *Implementing Effective Modern Slavery Grievance Mechanisms – A guidance Note for Business*. Global Compact Network Australia. March 2021 pg 22

SMEC supports and encourages everyone to ask questions and raise concerns of suspected reportable conduct. We utilise a third party-hosted reporting platform which allows employees and suppliers to raise confidential grievances. SMEC has also allocated a specific email address for those who prefer to provide reports by email.

SpeakUP SMEC

During the reporting period, SMEC further developed its grievance mechanism and introduced its *Modern Slavery Investigation Procedure* which sets out how SMEC will investigate and, where applicable, remediate grievances and allegations relating to human rights abuses or modern slavery within its operations or supply chain. The procedure is based on recommendations by national and international guidance (*UN Guiding Principles* and *Global Compact's Implementing Effective Modern Slavery Grievance Mechanisms*).

As noted above, during the reporting period, SMEC identified that not all high risk workers (such as cleaners and maintenance workers) have knowledge of SMEC's grievance mechanism because they are not direct suppliers or employees of SMEC and may not have direct access to the websites on which SpeakUP SMEC is hosted. During the next reporting period, SMEC will implement a process for such individuals to gain easier access to SMEC's grievance mechanism.

Training

A key aspect to ensuring that our employees can identify, report and help prevent modern slavery is building awareness through training. In the previous reporting period, SMEC rolled out its compulsory online training module to all employees, with high percentage completion rates.

The training is also issued to all new employees as part of their mandatory onboarding requirements, including through the reporting period..

During the current reporting period, SMEC has developed a bespoke training module to advance our employees' understanding of modern slavery.

In particular, the training better represents how modern slavery may arise within SMEC's operations or supply chain. It uses examples more representative of the services that SMEC provides and builds upon what red flags to look out for when identifying possible modern slavery. The training includes 10 questions designed to test the knowledge of our employees and includes clear guidance on how to issue reports of suspected modern slavery.

The training is schedule for roll out in Q1/Q2 of the next reporting period and will be mandatory for all employees.



Assessing the effectiveness of our actions

Monitoring and review of the effectiveness of our actions is embedded in our risk management framework and is key to our continued improvement.

In our last Statement, we identified three focus areas assessing the effectiveness of our actions during the reporting period:

Measuring awareness

SMEC looked to its employees to provide feedback on (1) the mandatory training module that was rolled out in the last reporting period and (2) general awareness of modern slavery.

Overwhelmingly, feedback in relation to the online training was positive with employees having a better understanding of what modern slavery is and how it might occur. It was acknowledged the training could be improved so employees better understood the risks presented to SMEC and how to make a report.

SMEC has utilised these comments to update its training module (as further set out above).

Measuring improvements to policies and procedures

Contractual arrangements

An audit was undertaken on commercial agreements executed with SMEC's supply chain between 1 January 2021 and 30 October 2021 to assess the level of inclusion of SMEC's standard modern slavery clauses:

80% were executed using the correct precedent version inclusive of modern slavery clauses;

20% were executed using the wrong precedent version without modern slavery provisions.

Possible reasons for non-compliances included previous versions of the agreement being downloaded and stored locally by individuals, meaning that the updates were not captured when rolled out to the supplier.

We are addressing this by including within training sessions hosted by SMEC's in-house legal team reminders that only those agreements hosted on SMEC's intranet site should be used and not previous versions downloaded and stored locally.

Policies

During the reporting period we have participated in externally hosted training and guidance sessions relating to modern slavery policy and procedures. We have learned from these sessions and developed our grievance mechanism (noted above) as a result.

Measuring supplier due diligence participation and cooperation

We acknowledge that we have not received responses or meaningful engagement from all suppliers contacted during the reporting period. This remains an area of focus for SMEC and follow ups are scheduled. SMEC will consider how best to approach continued relationships with those suppliers that do not wish to engage on this subject.



Consultation

SMEC has a process of consultation throughout the reporting period with quarterly progress updates to SMEC's executive committee and board. In preparing this Statement, consultation across each reporting entity and / or entities owned or controlled by a reporting entity has been conducted through the compliance and legal teams and boards of directors.

Our values

Our core values represent what we stand for, what we expect from employees, what we deliver to our clients, and how we aim to conduct our daily work. We are committed to leading by example and continuing to build a values-led global culture.

People

We act responsibly and conduct our business with the highest ethical standards, accountability and transparency.

Professionalism

We value our global and diverse talent by creating a safe, inclusive and supportive environment where our people can thrive.

Integrity

We act in the best interests of our clients and deliver innovative solutions with high standards of excellence.

Purpose

We build trusted and enduring relationships with clients, partners and colleagues to achieve win-win outcomes.

Partnership

We are passionate and committed to making meaningful impacts on our communities and environment.

Compliance

We believe that integrity is our collective responsibility. We are committed to supporting honesty, transparency and compliance through our organisational culture, systems and operational environment.

Appendix A

Mandatory criteria	Page
Identify the reporting entity	3
Describe the structure, operations and supply chains of the reporting entity	4-6
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	7-15
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.	7-15
Describe how the reporting entity assesses the effectiveness of such actions	16
Describe the process of consultation on the development of the statement	17
Other information that the reporting entity considers relevant	4, 17



We're redefining exceptional

Through our specialist expertise, we're challenging boundaries to deliver advanced infrastructure solutions.

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