



GR ENGINEERING SERVICES
ENGINEERING CONSULTANTS AND CONTRACTORS

MODERN SLAVERY STATEMENT 2020

GR Engineering opposes all forms of slavery and forced labour in its operations and the operations of its suppliers



Introduction

This Modern Slavery Statement (Statement) by GR Engineering Services Limited ABN 12 121 542 738 and its controlled entities (GR Engineering) is published as required by the Modern Slavery Act (Cth) (Act). GR Engineering has progressively introduced systems and procedures in FY20 to address the requirements of the Act.

This Statement outlines GR Engineering's approach to ensuring that it has processes in place to minimise the risk of modern slavery within its business operations and supply chain.

Core Values

GR Engineering is founded on a strong belief in our core values. These core values drive our people and underpin the company's corporate goals of providing clients with superior service, establishing safe and effective working relationships as well as respect for the culture, diversity and values of others.

GR Engineering's core values are:

- ◆ We strive to provide a safe, healthy and hazard free workplace
- ◆ Our clients are our focus
- ◆ A commitment to innovation and quality
- ◆ Our people are our most significant asset
- ◆ We will always act with honesty and integrity
- ◆ Respect for the community and environment in which we work

Structure, Supply Chain and Operations

Structure

GR Engineering is an ASX listed company that is headquartered in Perth and has offices across Australia. During FY20, GR Engineering acquired Hanlon Engineering & Associates Inc., based in Tucson, Arizona.

GR Engineering provides high quality process and detailed engineering design, procurement and construction services to the mining and mineral processing industry and also provides operations, maintenance, project and advisory services to the oil and gas sector.

During FY20, GR Engineering had consolidated revenue in excess of \$200 million and employed over 400 employees.

With the exception of GR Engineering Services Americas Inc. and Hanlon Engineering & Associates Inc., GR Engineering retains overseas subsidiary entities which are now dormant with no operations or employees during the reporting period.

Supply Chain

GR Engineering sources a diverse range of goods and services. The top categories of supply by spend for FY20 were:

- ◆ Processing equipment
- ◆ Construction materials and consumables
- ◆ Plant and equipment hire
- ◆ Subcontractor services
- ◆ Transport, travel and accommodation

GR Engineering typically undertakes business with pre-qualified suppliers operating under purchase order terms and conditions or negotiated subcontracts. Over time, GR Engineering has built long term relationships with a large number of these suppliers.

During FY20, the vast majority of GR Engineering's annual supplier spend occurred with suppliers and subcontractors located in Australia, noting that these companies are also subject to Australian modern slavery legislation, as applicable.

Based on the above, GR Engineering regards the risk of modern slavery to its supply chain to be low.

Operations

The majority of GR Engineering's employees are employed directly and under permanent, part-time or casual contracts or under enterprise bargaining agreements. The enterprise bargaining agreements in place have been approved by the Fair Work Commission.

In some instances, the direct workforce was supplemented by direct labour hire who were engaged at market rates and on standard industry terms and conditions.

Based on the above, GR Engineering regards the risk of modern slavery to its operations to be low.



Mitigating Risks of Modern Slavery

This is GR Engineering's first year of reporting under the Act and GR Engineering is committed to ensuring it meets the obligations under the Act.

In response to the Act, GR Engineering established its own modern slavery policy and standard outlining its stance on modern slavery and embedding our commitment to address this issue in our business and supply chain. Our policy is published on our website and states that we will:

- ◆ Respect the diverse cultures and heritages of local communities
- ◆ Respect the rights of indigenous peoples
- ◆ Respect that all personnel have a right to reasonable work conditions
- ◆ Comply with the requirements of the Act
- ◆ Not tolerate harassment or adverse discrimination

In addition, our activities will be guided by:

- ◆ The International Bill of Rights (including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant of Economic, Social and Cultural Rights); and
- ◆ The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work (which contain the eight core conventions of the ILO, including freedom of association and the right to collective bargaining).

These policies are consistent with GR Engineering's Core Values.

GR Engineering has also taken the following actions to assess, address and eliminate the risk of modern slavery within our operations and supply chain:

- ◆ Reviewed our preferred suppliers list and did not identify any suppliers with a high risk of modern slavery in its supply chain
- ◆ Ensured management and senior procurement staff were trained in the requirements of the legislation
- ◆ Established a Whistle-blower policy noting that if employees had any evidence of breaches of any modern slavery legislation, they were encouraged to report these breaches to their immediate manager
- ◆ Updated its supplier pre-qualification process to include specific questions relating to modern slavery
- ◆ Updated our procurement standard terms and conditions to include compliance with the Act's requirements
- ◆ During board and management meetings, consulted with senior management in GR Engineering's wholly owned subsidiaries in relation to compliance with the Act
- ◆ Implemented an anti-bribery and anti-collusion policy

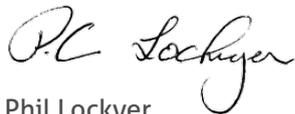
Through the processes described above, GR Engineering did not identify any risks of modern slavery in its operations or supply chain for the FY20 period.

The focus during FY20 has been on the development of the modern slavery framework and implementation of associated processes and procedures. As this is GR Engineering's first reporting period, it is not possible to assess the effectiveness of the introduction and implementation of GR Engineering's Modern Slavery policy and standard.

Our Future Commitments

GR Engineering is committed to continuous improvement and as such we will focus on the following activities during FY21:

- ◆ To evaluate the implementation of GR Engineering's Modern Slavery Policy
- ◆ Expand written confirmation of compliance of modern slavery requirements to existing suppliers



Phil Lockyer
Non-Executive Chairman
15 March 2021

Approved by GR Engineering Services Limited's Board of Directors on 15 March 2021



About GR Engineering

A leading process engineering, design and construction organisation that strives to provide workable, cost effective solutions and quality services to the global resource and mineral processing industry. GR Engineering has a proven track record of delivering turn-key projects in over 20 countries

The company guarantees integrated, efficient and practical designs whilst maintaining a high level of safety and operational performance

Personnel at GR Engineering have the capability and track record to undertake projects from the initial evaluation and study phase through to design, construction, commissioning, operational support and asset management

Contact

Geoff Jones
Managing Director
Ph: +61 8 6272 6000

Omesh Motiwalla
CFO & Company Secretary
Ph: +61 8 6272 6000

Australian Office Details

71 Daly Street
Ascot WA 6104
PO Box 258
Belmont WA 6984
Ph: +61 8 6272 6000

gres@gres.com.au
www.gres.com.au

