



MODERN SLAVERY STATEMENT 2020

SEPTEMBER 2020



⊙ Engineer ⊙ Construct ⊙ Sustain

**MAKING
THE
COMPLEX
SIMPLE**

An Opportunity for All: Removing Slavery from the Supply Chain

SRG Global Limited (“SRG”) opposes the oppression and abuse of human rights, including the use of forced labour and slavery. This statement has been prepared and approved by the Board of Directors of SRG Global Limited (Australian registered Company Number 104 662 259)¹ and on behalf of its related body corporate in accordance with the Commonwealth of Australia’s *Modern Slavery Act 2018* and provides our commitment to continuously review and implement steps to eradicate human rights abuses from all aspects of our supply chain.

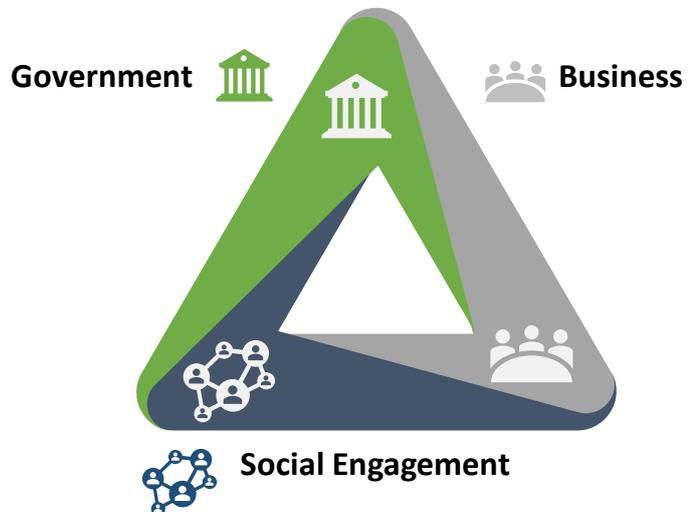
Described as the severe exploitation of people for personal or commercial gain, Modern Slavery entraps more than 175 million² victims in global supply chains where they are exposed to unacceptable working conditions. Importantly, the term Modern Slavery is not limited to physical restrictions. Increasingly, circumstances of debt bondage, abuse of minimum wage payments, discriminatory employment practices, coercion, threats and deception are other further examples of exploitation methods used by those profiteering through oppressive circumstances.

SRG recognises that as an organisation we have a responsibility to diligently identify and address exposures within our Supply Chain, importantly however, we understand this issue cannot be addressed solely by our actions but rather through the support of and engagement with Governments, Business and through Social Dialogue with key stakeholders,:

Governments set policy and laws, such as the *Modern Slavery Act 2018 (Cth)*, which provides actions to guide and support businesses in the eradication of slavery practices within their operations and supply chains.

Business holds a responsibility to remain diligent to ensure all aspects of their operations and supply chain is free from slavery practices.

Social Dialogue including engagement with stakeholders, the community and industry bodies. Core to the success of any practices implemented by organisations is that the practices both align with, and are supported by, the broader community.



This statement sets our policy and governance framework for the detection and abolishment of these practices within SRG’s operations or supply chains.

This statement was approved by the Board of SRG Global Limited on 15 December 2020

Peter McMorrow
Chairman SRG Global Limited

¹ SRG Global Limited (ACN: 104 662 259) is the ultimate holding company of the SRG Global Group of companies as listed in Appendix A of this Statement.

² Statistics taken from 2019 8.7 Alliance Report “Ending child labour, forced labour and human trafficking in global supply chains”

About SRG

SRG was born out of Australia’s greatest ever engineering and construction challenge, the Snowy Mountains Hydro-electric Scheme, in 1961. Today, SRG (ACN 104 662 259) is a public company listed on the Australian Stock Exchange with a diversified operations base comprising of:

	<p><u>ASSET SERVICES</u> Sustaining complex infrastructure</p>	<p>SPECIALIST MAINTENANCE Highly skilled specialist maintenance services</p>	<p>ACCESS SOLUTIONS Comprehensive structural and technical access solutions</p>
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	<p><u>MINING SERVICES</u> Comprehensive ground solutions</p>	<p>PRODUCTION DRILL & BLAST Integrated range of complementary production drill & blast services</p>	<p>SPECIALIST GEOTECH Highly technical specialist ground and slope stabilisation services</p>
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	<p><u>CONSTRUCTION</u> Constructing complex infrastructure</p>	<p>CIVIL & ENGINEERING Specialist engineering, post tensioning and construction services</p>	<p>SPECIALIST BUILDING Specialist façade and structural construction and remediation services</p>
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Our specialist technical capabilities, diversified services and global experience working on iconic skyscrapers, bridges, dams, structures, transport infrastructure, mining and oil and gas projects, means there is no complex challenge we cannot resolve.

Working across the entire asset lifecycle, we provide bespoke “Engineer, Construct and Sustain” solutions, our team incorporating every discipline and skill required to meet the challenges our customers set.



Our global footprint



Headquartered in Perth, Western Australia, our unique and diverse skillset has driven us to a global footprint with current operations located in Australia, New Zealand, the United States of America³, the United Arab Emirates, Oman Bahrain, Qatar, South Africa and the United Kingdom employing more than 2000 people worldwide.

³ As of the date of this statement, SRG's operations in the United States of America will be conducted remotely from Australia in conjunction with our local partner. SRG has completed previous campaign projects in Hong Kong, Indonesia, Ireland, Lesotho, Malaysia, Panama, Papua New Guinea, Singapore, Sudan, Thailand and Zambia. No current or permanent locations are in these territories.

Managing the Risk of Modern Slavery at SRG Global

Governance and Policies

SRG recognises the importance of developing a clear structure for the management of its businesses to protect human rights and the abolishment of slavery practices. Pursuant to our 2020 **Corporate Governance Statement**, our Board has developed a framework for the management of SRG Global including the adoption of corporate governance practices, the implementation of internal controls and risk management processes.

The SRG **Board's** role is to represent and serve the interests of shareholders and the expectations of our stakeholders through the oversight and appraisal of SRG's operations. This includes the setting and review of compliance systems commensurate to our values and governance framework.

Delegation of SRG's management is passed to our **Managing Director**, who in association with SRG's Officers implement the strategic objectives and plans as approved by the Board. Through the Managing Director, SRG's **Executive Leadership Team** is accountable for the implementation and delivery of the Organisation's strategic directions.

Our Framework

Our **Code of Conduct** sets the foundation for the minimum expectations and behaviours to which we hold ourselves, our employees, service providers and suppliers to account. Collectively these expectations and behaviours establish the values to which we as a Company hold ourselves to account.

Supporting our Code is our risk management system comprising of our Policies and Procedures that provide the structure for how we deliver on these values and the Code, delivered through our Integrated Management System (**IMS**).

Our **Diversity & Inclusion Policy** outlines our commitment to ensuring the fair and equitable treatment of local suppliers and workers without discrimination on the basis of aspects such as gender, race, ethnicity or religious views. We are committed to creating a diverse and inclusive workforce through sourcing, selecting, developing and recognising our own people and those of our stakeholders.

Supporting our Diversity & Inclusion policy is our **Sustainability Policy**. This sets our commitment to develop an operational model to manage the economic, environmental and social risks and opportunities encountered across our operations.



Assessing our risk to Modern Slavery Practices

As a global Company, we procure goods and services from both domestic and international suppliers and as such, our framework is designed to support our operations in the identification and eradication of slavery practices. To this end SRG recognises that its greatest exposure to modern slavery related issues exists within the companies purchasing and distribution supply chain.

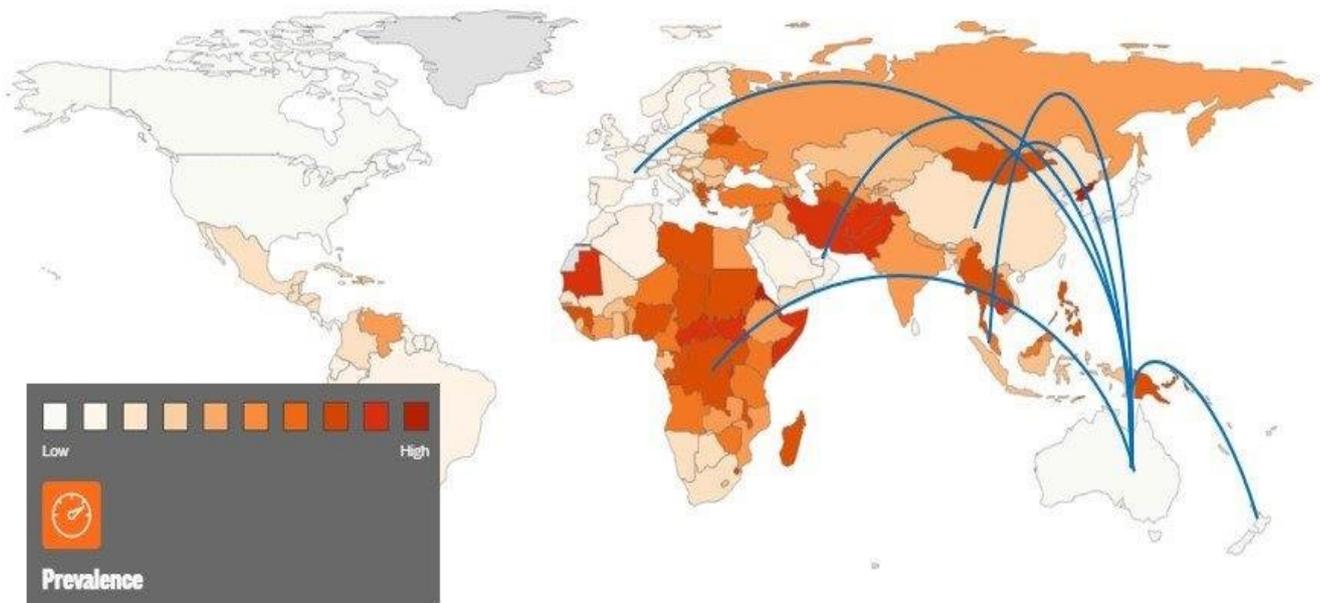
To address the exposures of modern slavery within our operations, in consultation with the Executive Leadership Team, a review of SRG’s operations was undertaken.

This focussed on:

- Areas of exposure;
- Existing methods of treatment; and
- Areas of improvement

In consultation with representatives from each business unit, including input from the commercial, finance, procurement, human resources, quality, health & safety and risk and communications teams, a strategic review was undertaken on the existing supply chains within the Company.

This heatmap⁴ below provides a graphical summary of exposure to modern slavery practices:



⁴ Heat Map taken from the Minderoo Foundation 2018 Global Slavery Index Report.

Supplementing the review on our supply chain, an analysis was also undertaken on our operations considered high risk in terms of either; exposure to modern slavery or having the potential to influencing decision making within the SRG supply chain. The influencing factors identified include:

MANUFACTURING

The procurement of products from overseas territories including China, Europe and Australia.

TRANSPORT AND LOGISTICS

Carriers and logistics operate within volatile spaces where fluctuations in fuel costs, restrictions in people movement and changing policy can impact operations.

LOCAL EMPLOYMENT

The use of locally employed or foreign nationals can expose SRG to breaches of modern slavery practices.

EMERGING MARKETS

Ensuring that any new market we enter into or seek to undertake business with meets the ethics and values of SRG.



GOVERNMENT

An awareness of pre-existing human rights abuses will form part of our assessment process.

LABOUR HIRE

Maintaining open engagement with our Subcontractors and Suppliers to ensure they are aware of their obligations.

COMMODITIES

Commodities, such as gold, can be subject to volatile employment conditions in developing territories.

CURRENCY FLUCTUATIONS

Acting as a trigger, organisations at risk of reduced profits and increased operating expenses, may seek alternatives to their existing supply chain to improve their profitability

Supply Chain Risks: Identification, Action and Treatment

As a result of the assessments completed to identify the territorial and operational risks above, we recognise that a vast array of circumstances may affect our suppliers, leading to changes in their manufacturing and distribution practices and subsequently may increase our exposure to modern slavery practices.

To combat these risks, we are committed to undertaking the necessary steps with the aim of preventing and removing any risk we may have to modern slavery conditions. This includes a process of identification, buying locally and education and treatment.

A Process of Identification

The management of supply chain risks forms part of SRG’s wider corporate risk management framework and practices. This framework includes the incorporation of controls and processes prudent to ensuring we meet the values established by our Board, our stakeholders and the community.

To support its commitment within its **Sustainability Policy** the Company’s risk assessment process serves to **identify** potential risk factors by focussing on:

- Understanding the scope of what we are trying to achieve;
- Identification of whether the activities can be completed by SRG or require the services of an external supplier;
- Undertaking and analysis of the risks associated with achieving the outcome;
- Evaluating the likelihood and exposure;

- Implementing treatment strategies to mitigate the exposure to unforeseen events or circumstances; and monitoring, reviewing and communicating.

Buy Local

We recognise that Australia holds strong and regulated importation and manufacturing regulations to support local industry. SRG will continue to procure where practical, the services of Australian suppliers to support its operations however recognises that this is not viable in all circumstances.

Education and Treatment

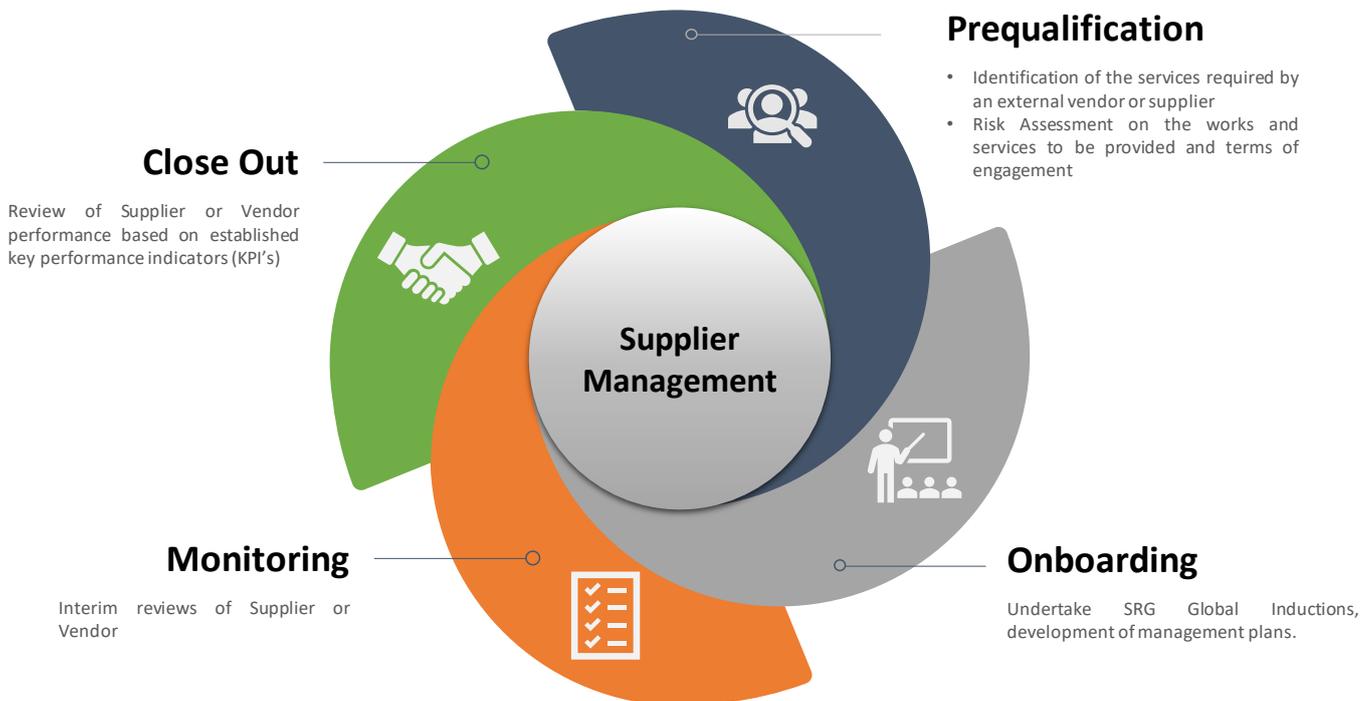
Supplier Onboarding and Management

To support the identification and assessment of slavery exposures in addition to wider human rights exposures, SRG has commenced the establishment of a “Supplier Onboarding and Management” procedure capturing the life cycle of external suppliers.

This process is focussed on:

- Pre-Qualification;
- Onboarding;
- Management; and
- Assessment and Close Out.

Oversight of the Supplier Onboarding and Management procedure will be administered through central locations via SRG’s IMS and communicated to business units through the organisations SharePoint platform.



Supplier Management Procedure

At the onboarding phase, SRG will undertake assessment of its suppliers in accordance with its Code of Conduct. The risk assessment process will include:

- Reviews of the potential supplier's services and operations;
- Product sourcing or manufacturing (as applicable) including traceability audits;
- Terms of employment (such as the use of EBA's or other industrial agreements); and
- Conducting checks through third party bodies or resources such as government databases to identify breaches or violations of human rights including previous prosecutions;

Approved suppliers will then be engaged ideally through an SRG contract including terms obligating the supplier to work in accordance with the ethical obligations included within the SRG Code of Conduct.

During the life cycle of the supplier's engagement, periodical reviews will be completed to ensure the suppliers continual compliance.

We recognise that communication is key to the success of eradicating slavery practices. We remain committed to proactively working with our suppliers to better educate and promote awareness of both the prevalence and forms of modern slavery and human rights abuses.

Our FY21 Objectives

SRG has established the following objectives for the FY21. These objectives are set to serve as the minimum achievements we expect to implement over the coming 12 months:

Implementation of Supplier Management Procedure

Complete the rollout of the “Supplier Onboarding and Management Procedure” commencing with early engagement and intervention with current suppliers. This will include the release of communications and awareness campaigns through the organisations IMS on the changes to the company’s existing procedures and the importance of self-awareness within their own operations.

Undertake Modern Slavery Training

Delivery of modern slavery awareness training to all employees involved in the procurement of suppliers and vendors. The training will focus on:

- What Modern Slavery is in 2020;
- Trends in Modern Slavery activity;
- Where Modern Slavery may exist within SRG’s supply chain;
- Our process of identifying, assessing and treating exposures to Modern Slavery; and
- The role of our people and suppliers in managing Modern Slavery.

Measuring Success

In line with our FY21 objectives, the following key performance indicators will be utilised as a benchmark:

- Complete rollout of the Supplier Onboarding and Management Procedure;
- Assessment of a minimum 30% of existing key SRG suppliers as at the date of this statement’s publication;
- 100% attendance of nominated employees of the modern slavery awareness training.

Periodical audits on our progress and compliance will be undertaken by SRG’s Quality and Compliance Manager.

SRG Global: Beyond 2020

As we navigate 2020, in the wake of the COVID-19 pandemic, through what has arguably been one of the greatest challenges faced by a more interconnected world, we understand that change is necessary to ensure we continue to meet the social responsibilities the community expects.

Businesses will continue to look to find ways of managing and growing revenue and profits in this uncertain environment. As a result, there is an inherent exposure that this may come at the cost of sourcing products that may place individuals involved in their manufacture and transport at risk in environments commensurate to modern slavery conditions. This statement will assist SRG and our supply chain partners to manage through such complexities in a fair and equitable manner.

As our first SRG Modern Slavery Statement, we recognise that the abolishment of modern slavery and human rights abuses is a journey that requires the engagement of our Suppliers, government and the greater community and we remain committed to ensuring we undertake our part in the process.

Appendix A SRG Global Limited Controlled Entities

Extract taken from SRG Global Limited 2020 Annual Report

Notes to the Financial Statements

Notes to the Financial Statements

FOR THE YEAR ENDED 30 JUNE 2020

NOTE 25. PARTICULARS RELATING TO CONTROLLED ENTITIES

(a) Group accounts include a consolidation of the following:

Entity	Country of Incorporation	Principal Activity	Ownership Interest Held by the Group	
			2020	2019
SRG Global Limited ⁽¹⁾	Australia	Corporate Services	100%	100%
Controlled companies				
Burgarrba PJV Pty Ltd	Australia	Asset Services	49%	-
CASC Contracting Pty Ltd	Australia	Dormant	100%	100%
Crow Refractory Limited	New Zealand	Asset Services	100%	100%
Red Ore Drill and Blast Pty Ltd	Australia	Dormant	50%	50%
SRG Contractors Abu Dhabi LLC ⁽²⁾	United Arab Emirates	Construction	49%	49%
SRG Contractors DB LLC ⁽²⁾	United Arab Emirates	Construction	49%	49%
SRG Contractors NZ Limited	New Zealand	Construction	100%	100%
SRG Contractors US, Inc.	United States	Construction	100%	100%
SRG Employee Share Trust	Australia	Trust	100%	100%
SRG Global (Australia) Limited ⁽¹⁾	Australia	Corporate Services	100%	100%
SRG Global Assets Pty Ltd ⁽¹⁾	Australia	Construction	100%	100%
SRG Global Building (Northern) Pty Ltd ⁽¹⁾	Australia	Construction	100%	100%
SRG Global Building (Southern) Pty Ltd ⁽¹⁾	Australia	Construction	100%	100%
SRG Global Building (Western) Pty Ltd ⁽¹⁾	Australia	Construction	100%	100%
SRG Global CASC Pty Ltd ⁽¹⁾	Australia	Construction	100%	100%
SRG Global Civil Pty Ltd ⁽¹⁾	Australia	Construction	100%	100%
SRG Global Corporate (Australia) Pty Ltd ⁽¹⁾	Australia	Corporate Services	100%	100%
SRG Global Facades (NSW) Pty Ltd ⁽¹⁾	Australia	Construction	100%	100%
SRG Global Facades (QLD) Pty Ltd ⁽¹⁾	Australia	Construction	100%	100%
SRG Global Facades (VIC) Pty Ltd ⁽¹⁾	Australia	Construction	100%	100%
SRG Global Facades (WA) Pty Ltd ⁽¹⁾	Australia	Construction	100%	100%
SRG Global Facades (Western) Pty Ltd ⁽¹⁾	Australia	Construction	100%	100%
SRG Global Facades Pty Ltd ⁽¹⁾	Australia	Construction	100%	100%
SRG Global Industrial Services Pty Ltd ⁽¹⁾	Australia	Construction	100%	100%
SRG Global Integrated Services Pty Ltd ⁽¹⁾	Australia	Asset Services	100%	100%
SRG Global International Holdings Pty Ltd ⁽¹⁾	Australia	Dormant	100%	100%
SRG Global Investments Pty Ltd ⁽¹⁾	Australia	Construction	100%	100%
SRG Global IP Pty Ltd ⁽¹⁾	Australia	Corporate Services	100%	100%
SRG Global Mining (Australia) Pty Ltd ⁽¹⁾	Australia	Mining Services	100%	100%
SRG Global Products Pty Ltd ⁽¹⁾	Australia	Construction	100%	100%
SRG Global Services (Australia) Pty Ltd ⁽¹⁾	Australia	Asset Services	100%	100%
SRG Global Services (Western) Pty Ltd ⁽¹⁾	Australia	Asset Services	100%	100%
SRG Global Structures (VIC) Pty Ltd ⁽¹⁾	Australia	Construction	100%	100%
SRG Global Structures (WA) Pty Ltd ⁽¹⁾	Australia	Construction	100%	100%
SRG Hong Kong Limited	Hong Kong	Construction	100%	100%
SRG International Holdings Pte. Ltd.	Singapore	Construction	100%	100%
T.B.S. Coatings Limited	New Zealand	Asset Services	100%	100%
TBS Farnsworth Limited	New Zealand	Asset Services	100%	100%
TBS Group Limited	New Zealand	Asset Services	100%	100%
TBS Remcon Limited	New Zealand	Asset Services	100%	100%
Total Bridge Services Limited	New Zealand	Asset Services	50%	50%
The following entities are in the process of deregistration				
Gallery Facades (SA) Pty Ltd	Australia	Dormant	100%	100%
GCS Hire Pty Ltd	Australia	Dormant	100%	100%
GCS Personnel Services Pty Ltd	Australia	Dormant	100%	100%
GCS Secured Pty Ltd	Australia	Dormant	100%	100%
GCS Summit Pty Ltd	Australia	Dormant	100%	100%
Meridian Concrete Australia	Australia	Dormant	100%	100%
Paragon Glass (VIC) Pty Ltd	Australia	Dormant	100%	100%
Paragon Glass Pty Ltd	Australia	Dormant	100%	100%
Rock Engineering (Aust) Pty Ltd	Australia	Dormant	100%	100%
Rock International Mining & Civil Pty Ltd	Australia	Dormant	100%	100%
SRG Contractors Doha LLC ⁽²⁾	Qatar	Dormant	49%	49%
SRG Global Contracting Pty Ltd ⁽¹⁾	Australia	Dormant	100%	100%
SRG South Africa (Pty) Ltd	South Africa	Dormant	100%	100%
Structural Rock Group Canada Limited	Canada	Construction	100%	100%
Structural Systems (Bridge Maintenance) Pty Ltd	Australia	Dormant	100%	100%
Structural Systems (Construction) Pty Ltd	Australia	Dormant	100%	100%
Total Fire Protection Pty Ltd	Australia	Dormant	100%	100%

⁽¹⁾ Controlled entities subject to ASIC Corporation (Wholly-owned Companies) Instrument 2016/785

⁽²⁾ In accordance with current foreign ownership restrictions in the United Arab Emirates (UAE), these entities have a 51% participation by UAE Nationals. This participation incurs a fixed fee and has no right to the profits or liability for the debts of the entity.

 **Engineer**

 **Construct**

 **Sustain**