

2023 Modern Slavery Annual Statement

For the period ending December 31, 2023



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1. Introduction

This Modern Slavery Statement is made pursuant to the Modern Slavery Act (2018) (Cth) and outlines CSE Global (Australia)'s commitment to combat modern slavery in all its forms. As a responsible and ethical organisation, we are dedicated and committed to preventing modern slavery within our operations and supply chains. This statement outlines the steps we have taken so far to address modern slavery risks and ensure our compliance with the Act.

This Statement is prepared by CSE Global (Australia) Pty Ltd (ABN 85 109 958 090) and each of its wholly owned subsidiaries (together referred to as CSE) under the rules of the *Modern Slavery Act 2018 (Act)* (Cth) for the financial year ending December 31, 2023 (the reporting period).

CSE provides this Modern Slavery Statement to Australian Border Force annually to be placed on the Modern Slavery Register for public access.

2. About CSE

CSE is a leading provider of integrated communications, security and energy solutions. Supported by a network of 22 offices across Australia and New Zealand (ANZ), CSE provides high quality local engineering, technical support and effective delivery of technically advanced products and systems for a safer and more productive world.

Leveraging world-leading technology, CSE delivers reliable, capable and always-on communication, security and energy solutions through our divisions CSE Crosscom and CSE Uniserve. From power system protection, monitoring and control to critical communications, network connectivity and infrastructure, our solutions ensure optimised operational safety and productivity.

With an experienced team of integrators, engineers and project managers, CSE provides highly specialised solution design, integration, installation and support to a range of industries, including mining, transport, utilities, retail, education and construction.

Our supply chain is comprehensive, encompassing suppliers and partners located both locally within the ANZ region and globally. The mission of CSE's supply chain management is to procure goods and services that comply with our internal policies, local and international standards and codes, as well as meet all relevant local and international law. Our goal is to:

- procure goods and services of the highest quality without risk or harm to our employees, contractors, the environment and the community;
- ensure all purchases are conducted on the basis of fair and equitable competition;
- ensure that the goods and services procured conform to the required standards and specifications as directed by our customers;
- procure in a way that is transparent and without conflict of interest;

CSE works diligently to ensure that it is compliant to the highest standards of corporate responsibility, ethics, and business conduct.



3. Our Structure and Operations

Our headquarters are located in Perth, Western Australia.

Our Modern Slavery journey commenced at the start of 2021 when CSE Executive Management set out the principles of the *Modern Slavery Act (2018)* (Cth) where new policies, procedures and a framework were rolled out to all business entities. Each year, Executive Management are consulted with on the development of the Annual Statement, changes to policies and/or procedures and any updates required to keep them informed and abreast of the Act and legislation.

CSE provides this Statement for itself and on behalf of all subsidiaries directly affected by a disclosure obligation in their respective jurisdictions. These are depicted in the Organisational Chart below:





4. Governance

CSE is overseen by a Board of Directors responsible for the overall governance and strategic direction of the organisation and for reviewing the delivery of acceptable corporate performance as it relates to business and community.

Operational leadership is delivered by our Chief Executive Officer (CEO) and the Executive Team members, who collectively drive the implementation of our strategic and operational plans and values.

At the start of our Modern Slavery journey, CSE implemented a team to manage Business Continuity with a mandate to guide the business through crisis management issues, compliance matters, and risk mitigation. The

team, known as the Business Continuity Planning Group (BCPG) and lead by the Group Commercial Manager, consists of subject matter experts who with their knowledge and understanding are able to implement and lead preventative actions in all fields of business continuity. This team consists of:

General Manager Human Resources HSE Manager Quality and Business Improvements Manager ICT Manager Group Commercial Manager Executive Assistant to the CEO

During 2020, our Modern Slavery and Human Rights Framework was incorporated into the function of the BCPG, and since then the BCPG meets annually with the topic of Modern Slavery and Human Rights forming part of the agenda. Matters such as policy, supply chain due diligence and internal employee training and awareness are agenda items covered and discussed.

5. Our Policies

Over the past three years, CSE has reviewed policies that would encompass the way we treat our people and engage with our supply chain and communities with the view to introduce statements and actions that would mitigate the risk of modern slavery and human rights abuse within our organisation and supply chain.

Policies and Procedures that have been implemented or updated to represent our commitment to the *Modern Slavery Act (2018)* (Cth) include:

- 1. Implementation of a **Modern Slavery and Human Rights Framework**. A framework that demonstrates our promise to attaining a culture that fosters and promotes the human rights of our people, suppliers, customers, communities, and other stakeholders. The policy outlines the definition of modern slavery, our zero-tolerance stance, and the actions to be taken if any suspicions or incidents arise.
- 2. Our **Vendor Code of Conduct** mandates that our suppliers and business partners must comply with the principles of the Act and legislation. The Code emphasises the prohibition of modern slavery practices, child labour, forced labour, and human trafficking. It also outlines our expectations for transparency, due diligence, and reporting requirements.
- 3. Our **Bullying**, **Harassment and Discrimination Policy** ensures our employees can attend work in an environment that is positive, supportive, and safe.
- 4. Our Recruitment Procedure includes:
 - a. a minimum age policy in line with the *United Nations Guiding Principles on Business and Human Rights*.
 - b. working hours are applicable with local laws.
 - c. prevents us from withholding original documents such as passports and driver's licenses.
 - d. only engaging with recruitment agencies that have pre-qualified and are registered through our due diligence and sustainable self-assessment programs.
 - e. standard employment contracts in line and underpinned by the Fair Work Act (2009).
- 5. We have a **Code of Business Ethics Policy and Guidelines** (COBE), which is reviewed annually and distributed to all employees. We require our employees to review the guidelines and complete a COBE declaration every twelve months with the view to identify and declaring any possible conflicts of interest. Ethical matters covered (but not limited to) include fraud, bribery, corruption, and theft.
- 6. A **Whistle Blower Policy** that provides a safe pathway for employees to discuss or lodge an issue or complaint where they will be listened to in a safe and protected environment.



7. Our **Procurement Manual** ensures that our supply chain due diligence has been conducted on all new vendors (suppliers and subcontractors) prior to engagement and that we apply best procurement practice at all times.

6. Taking Action to Address the Risks

6.1 Supply Chain

During 2020 we implemented our Self-Assessment Questionnaire and Declaration which is completed by our supply chain Tier One partners. The declaration provides us with the information we use to help understand, identify, and mitigate against modern slavery and human rights risks within our tier one suppliers. Throughout 2025 we will recommence the supply chain assessments of our pre-existing suppliers.

Our aim is to work transparently with our supply chain towards the achievement of the program set out by the *United Nations Guiding Principles of Business and Human Rights*.

CSE's standard contract terms and conditions of purchase require suppliers to comply with all applicable laws and regulations, including the *Modern Slavery Act (2018)* (Cth). In addition, CSE's standard contract terms require suppliers to adopt and comply with our Vendor Code of Conduct.

CSE does not conduct audits, whether independent or otherwise, of our suppliers specifically to evaluate their compliance with the *Modern Slavery Act (2018)* (Cth). At present, we rely either on:

- contractual obligations where we have a supplier or subcontract agreement in place; and/or
- signed declaration when being onboarded as a new supplier or vendor;

In FY 2024, we will endeavour to continue our supply chain due diligence, working towards measures that identify and mitigate against modern slavery and human rights abuse. In FY 2025, we intend to commence our supply chain mapping program, which will start to identify the geographical regions and locations where goods and equipment are manufactured; as well as industry sectors and the nature of the products or services involved. This will better enable CSE to understand our supply chain risk and actions needed to mitigate against these risks.

6.2 Our Workforce

As at the end of FY 2023, CSE employed 342 people. Under the leadership of our General Manager, Human Resources, the Human Resources Team ensured that we recruit the right people for our business, and we provide a safe and secure environment for them to work in. The Human Resources Team is responsible for delivering the framework that encourages our staff to participate in our vision, values and culture. We aim to ensure that all employees are empowered to contribute and make a difference.

Our employees are engaged on standard employment contracts, aligned and underpinned by the relevant awards at law currently operational within our industries.

During 2023, 97% of our employees were on full-time/part-time permanent employment arrangements. We had 1% of employees under casual arrangements and 2% working under visa arrangements.

The figures below depict the breakup of employees based on age, gender, permanent, visa and casual arrangements:



Figure 2 - Employees as at 31 December 2023 - By Age and Gender



Figure 3 - Employee by Contract Type as at 31 December 2023



Our workforce includes a mix of engineers, technicians, management, finance, and administration personnel, as well as apprentices, trainees and post-graduates. We consider the risk of CSE contributing to modern slavery through our employee engagement as extremely low.

We ensure our people are remunerated fairly, have fair and equitable employment conditions and contracts and have policies and procedures in place that would govern and prevent any risk of modern slavery or human rights abuse.

CSE is committed to cooperating with relevant authorities in the fight against modern slavery. If any concerns related to modern slavery or human rights abuse within or outside of CSE, employees are encouraged to report such concerns to <u>confidential@cse.net</u>, the Group Commercial Manager or the CEO.



6.3 Training

Our modern slavery and human rights program are dependent on the practical understanding of our people. Over the past three years, CSE has embarked on delivering several training events for our senior management and employees. This includes the provision of information on our SharePoint platform and the inclusion of this topic in our Toolbox Talks.

Over the course of 2023 and ongoing monthly, CSE provides a webinar (arranged by our Human Resources Team) for all staff with topics that cover matters such as diversity and inclusion, bullying and harassment and fair communications. All employees are encouraged to register for these online events. Additionally, in quarter 4 Business Update (which is broadcast via Teams to all offices of CSE) the subject of modern slavery and human rights is covered, thus updating all employees on the subject matter.

Our new employee inductions include a section informing new employees on our modern slavery and human rights policies and procedures, and this includes our Corporate and Social Responsibility and Code of Business Ethics Policies and Guidelines.

6.4 Labour Hire

CSE engages labour hire employees on an extremely low occurrence, and at the time of writing, there were no labour hire employees engaged within the businesses.

Labour hire agencies must be recognised as a CSE approved supplier had as such have completed and passed all modern slavery checks before being added to the approved register.

Furthermore, the use of labour hire employees can only be approved and coordinated through our Human Resources Team.

We believe the risk of modern slavery through our labour hire agencies to be extremely low.

7. Measuring our Actions

CSE implemented the below table in FY 2020 to ensure we stay on track with our commitments, and we continue to measure and assess our progress as we move forward on this journey:

Table 1 - Modern Slavery Measures and Assessment

AREA	ACTION	MEASURE
Governance	 Employee training Policy reviews Supply chain management and disclosure Board approval and oversight Agreements/Contracts New Supplier and Subcontractor forms 	 # Of team trained Annual review of policies and procedures Annual review of supply chain declarations Annual report to CEO All Agreements/Contracts to contain modern slavery commitments All new supplier and subcontractor forms to contain modern slavery commitments
Review	 Internal audits Supplier self-assessment questionnaire 	 Include modern slavery into our internal audit procedure with 100% compliance Monitor self-assessment questionnaires for 100% compliance
Risk	Enterprise Risk RegisterSupply chain entry	Annual risk assessment



AREA	ACTION	MEASURE
		Review of supply chain onboarding paperwork 100% compliance
Reporting	 Cases raised Channels used to raise the cases 	 Total number of cases reported internal and/or external Mechanisms used to raise a case (Whistle-blower or open reporting)

8. Next Steps

Looking forward to 2024 and beyond, CSE will continue to strengthen its efforts to combat modern slavery. We will refine our policies, procedures, due diligence processes to address emerging risks. We will also collaborate with our stakeholders, including suppliers, customers, and industry peers, to create a collective impact in eradicating modern slavery from our supply chains.

9. Supply Chain Appreciation

CSE would like to take this opportunity to place on record our appreciation of our supply chain in collaborating with us on this important matter. CSE is committed to continue collaborating with our suppliers, raising awareness and embarking on this journey of continuous improvement.

Our suppliers are pivotal to the success of our operations, and we recognise the importance of their support in creating sustainable value for our customers, shareholders, employees, and communities.

10. Approval and Signature

This disclosure describes the efforts CSE has taken in our own business, as well as with our supply chain, to work towards the eradication of modern slavery and human trafficking. These efforts as well as this disclosure, are updated annually with input from stakeholders, reviewed and approved by our Board of Directors.

William Roy Rowe Chief Executive Officer CSE Global (Australia) Pty Ltd 12 November 2024