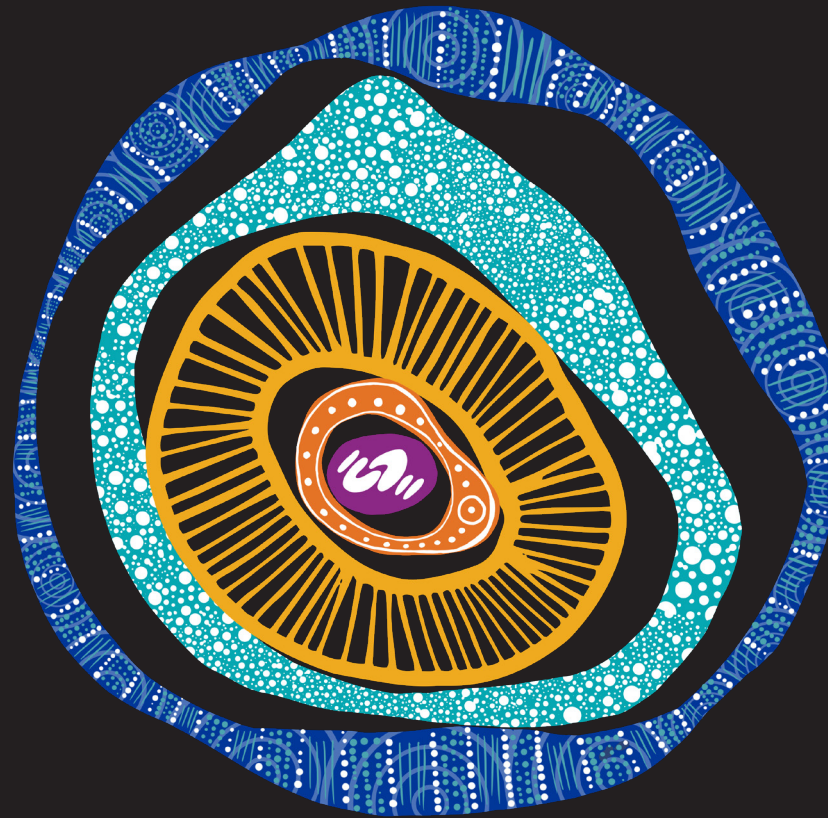




Modern Slavery Statement

Beca acknowledges First Nations peoples of Australia
as the Traditional Custodians of the lands, waters
and Communities where we live, learn and work.



Canberra Office
Ngunnawal

Adelaide Office
Kurna

Brisbane Office
Turrbal & Yuggera

Melbourne Office
Wurundjeri

Designed by Pat Caruso

Sydney Office
Gadigal

Newcastle Office
Awabakal

Introduction

The Beca group of companies (Beca Group) is dedicated to conducting business in a lawful manner and to the highest standards of business ethics. We expect our suppliers to conduct business to the same high standards.

Beca Group opposes all forms of slavery and human trafficking and is committed to ensuring modern slavery or trafficking does not exist in any part of Beca or in our business dealings.

We strive to achieve this by acting ethically and with integrity and transparency, and by acting in accordance with our standards and principles including those outlined in this policy.

This statement constitutes the Beca Pty Ltd ACN 004 974 341 (Beca Australia) modern slavery statement in accordance with the Modern Slavery Act 2018 (Cth) for the financial year ending 31 March 2025.

Structure, operations, and supply chains

Structure

Beca Australia is structured as a company incorporated in Victoria, with approximately 780 permanent employees across offices in Brisbane, Sydney, Canberra, Adelaide, Newcastle and Melbourne. Beca Australia's registered office is at: Level 23, 695 Collins Street, Melbourne VIC 3008.

Beca Australia is part of the Beca Group. Beca Australia's ultimate holding company is Beca Group Limited.

Beca Australia owns/controls the following entities (subsidiaries):

Beca Consultants Pty Ltd, ACN 003 431 089, located at Level 23, 695 Collins Street, Melbourne VIC 3008 (BCPL). BCPL carries out the same type of services as Beca Australia. It has no employees and relies on secondees and sub consultancy services from Beca Australia to provide its services.

Hunter H2O Holdings Pty Limited, ACN 602 201 552, located at 19 Spit Island Close, Mayfield West NSW 2304 (HH2O). Beca Australia acquired the shares of HH2O in April 2022. HH2O carries out the same type of services as Beca Australia.

As a result of the above circumstances, neither BCPL nor HH2O faces modern slavery risks that are not already dealt with by Beca Australia.

Accordingly, for the purposes of this statement, a reference to Beca Australia includes a reference to BCPL and HH2O.

Operations

Beca Australia is an independent advisory, design and engineering consultancy business. Beca Australia primarily provides services in relation to projects in Australia, but occasionally does provide services for

projects outside of Australia. Beca has been in existence for over a century in New Zealand and for more than fifty years in Australia, and the group currently has over 4400 employees in more than 20 offices around the world.

Aside from our Australian offices, others are in New Zealand, Singapore, Indonesia, New Caledonia, Myanmar, Thailand, and Fiji. All locations provide professional engineering consultancy and associated services and Beca Australia provides services to other Beca companies in these countries.

The majority of our employees are office-based, with a small number of exceptions where professional support is provided on project or client sites. The core of the company relies on employees who are professional engineers, draftspeople, planners, project managers, hydrologists, and architects. Support teams exist for IT, Administration, Procurement, Finance, Health, Safety & Environments, Legal, Clients and Markets and People and Culture.

Supply Chain and Suppliers

As an engineering and professional services consulting firm, Beca considers the risk of modern slavery and human trafficking in its supply chain to be low. This is largely due to the nature of our business and the services that we and others in our supply chain provide.

Our Australian supply chain predominantly comprises professional consultancy service providers and information and communications technology software and hardware suppliers. The majority of our consultancy partners are engaged on a project-by-project basis, operate in office-based environments, and are principally located in Australia. Our ICT suppliers include both large multinational corporations with established ethical sourcing frameworks, as well as smaller local businesses providing niche software solutions.

A smaller proportion of our procurement relates to goods and services supporting general office operations—such as consumables, facilities management, travel, and accommodation. These requirements are fulfilled through group contracts with reputable suppliers based in New Zealand or via trusted local Australian-based vendors servicing our regional offices.

Beca maintains rigorous supplier selection and onboarding processes that include consideration of ethical standards. Where appropriate, we seek assurances from suppliers regarding their own practices related to labour rights, workplace conditions, and compliance with relevant legislation.

While we assess the risk of modern slavery within our direct supply chain as low due to its composition and geographic focus, we remain vigilant. We are committed to continuous improvement in our procurement practices—including regular review of supplier relationships—and take seriously any concerns relating to unethical or unlawful conduct.

Risks of modern slavery practices

Beca considers the risk of modern slavery and human trafficking in its supply chain to be low. This is largely due to the nature of our business and the services that we and others in our supply chain provide which meet sound internal or industry standards. Many of our product and service suppliers are large organisations which are covered by various Modern Slavery legislation in Australia and throughout the world. We consider the risk of modern slavery and human trafficking to potentially be highest with smaller local suppliers and sub-contractors such as office cleaners and security.

There have been no reported concerns relating to modern slavery and human trafficking via our whistleblowing channels.

Actions to assess and address risks

Overview

Whilst our risk is low, Beca has implemented practices and measures to minimise the risk of modern slavery and human trafficking taking place within our supply chain. These practices are annually reviewed and continuously improved to ensure they continue to deliver their intended outcomes.

These include:

- a) Undertaking due diligence of suppliers we do business with as part of best-practice tendering, contract negotiations and supplier onboarding activities.
- b) Ensuring contractual terms agreed with our suppliers require compliance with applicable laws and regulations.

- c) Ensuring all employees have a written contract of employment that enshrines our employees' rights and entitlements at law.
- d) Implementing policies and ongoing training on safe and respectful work environments which promote health and wellbeing – underpinned by our Ethics Policy that demonstrates our commitment to acting ethically and with integrity in all our business dealings.
- e) Ensuring our legislative obligations are upheld as part of our Legislative Compliance Framework by conducting annual reviews of our risks associated with our business operations.
- f) Partnering with companies that have robust ethics and governance standards that are aligned with our own.

All our actions taken are to continue to embed activities that enable us to monitor, and minimise, the risk of modern slavery and human trafficking in our supply chain.

Actions Taken in the Last 12 Months:

Our multi-disciplinary working group for Modern Slavery continues to drive action to further embed practices and measures to minimise the risk of modern slavery and human trafficking taking place within our supply chain.

This group is made up of representatives from our People and Culture, Risk & Policy, Legal, Procurement and Operational teams at a Group and local level.

Work previously established in 2024 continues, including:

- Implementing the Modern Slavery learning modules for all employees.
- Ensuring ongoing attention and awareness for our employees on our Group Risk and Opportunity Appetite Statement that communicates the Group's "zero" tolerance for illegal or unethical behaviour and non-compliance with the law, including Modern Slavery legislation.
- Evolving our supplier onboarding processes that includes modern slavery and ethical supply chain questions.

- Annual update to Modern Slavery risk register reviews and updates.
- Annual organisational reporting driven via the Audit & Risk Committee.

In addition to this, further practices and measures have been designed as part of the transition Beca is undertaking to a new ERP system Oracle Fusion, and the growth of its Group Procurement function.

Actions (both achieved and planned for completion) in 2025 include:

- a) Establishing the Group Procurement team to centralise and standardise procuring activities and practice across our global operations.
- b) Restructuring procurement efforts around key categories of spend to drive targeted action across professional services consulting, ICT and corporate spend areas.
- c) Targeted training and development for newly established Group Procurement team on modern slavery and ethical supply chain.
- d) Refresh of our Group Procurement Policy to continue to strengthen statements and guidance around ethical supply chain requirements.
- e) Evolving data capture and reporting on modern-slavery compliance from our supply chain through new functionality available in Oracle Fusion supplier onboarding.
- f) Expanding our Ethics Policy to be inclusive of the standards we expect of our supply chain and delivery partners.
- g) Publishing a Supplier Code of Conduct applicable to all Beca suppliers and available publicly on our website for transparency and accountability of current and potential suppliers.

Effectiveness of actions to assess and address risks

Modern Slavery related risks are recorded in the Australian Modern Slavery Risk Register, in accordance with the requirements of Beca's Group Risk Management Policy and Group Risk Framework, where the risk is clearly defined in terms of the following:

- risk category;
- risk event description, cause(s) and consequence(s);
- risk manager;
- existing controls in place;
- risk likelihood and consequence;
- current risk level score considering the effectiveness of existing controls;
- residual risk score considering the effectiveness of proposed mitigation actions;

The effectiveness of controls required to eliminate or minimize each modern slavery risk are assessed using the scale outlined in the table below:

Effective	<p>Nothing more to be done except review and monitor the control for implementation and effectiveness.</p> <p>Management considers the control to be well designed for the risk, and addresses the root causes.</p> <p>Management believes the control is effective and reliable at all times.</p>
Generally Sound	<p>Control has been designed correctly and is in place and effective.</p> <p>Some more work needs to be completed to improve its operating effectiveness, or management has doubts about the effectiveness and reliability of the control.</p>
Needs Improvement	<p>Significant control gaps.</p> <p>Either the control does not treat the root causes or does not operate at all effectively.</p>
Under Development	<p>Control has not been established but is being developed.</p>
Not in Place	<p>Control has not been established.</p>

A work plan is then established to document the actions required to further establish, implement and monitor the effectiveness of existing controls and proposed mitigation actions. The work plan includes the following information:

- control description;
- control owner;
- actions required to establish, implement and monitor the effectiveness of the control;
- action owner;
- target start and completion date for each action;
- method of obtaining assurance control is in place and effective;
- internal auditor details.

The Beca Group Board will review major risks to which the Beca Group is, and is likely to be, exposed to and approve internal auditors and the scope of their audit function.

The Audit and Risk Committee's mandate includes providing oversight of our governance, audit function, legislative compliance and risk management function on behalf of the Board. This mandate includes regular reviews of progress made in relation to closing-out any actions arising from internal audits.

Annually the Beca Group Limited Board reviews the effectiveness of our audit function, including to review the effectiveness of the methods and actions taken by the Beca Australia Board to assess modern slavery risks. The Beca Group Board reviews significant audit and compliance issues including modern slavery risks and approves action and remediation plans following Audit and Risk Committee recommendations.



The Australian Modern Slavery Risk Register and Statement is reviewed on an annual basis with subject matter experts within Beca.

The scope of the review includes:

- the effectiveness of Beca Australia's risk assessments;
- determining if a risk is live or is closed;
- determining if a risk event description, cause(s) and consequences(s) has changed;
- re-assessing Current and Residual Risk Level scores to consider the effectiveness of existing controls and progress made in proposed mitigation actions;
- identifying any emerging risks.

Effectiveness indicators include:

- Completion rates of mandatory employee education/training modules;
- Number of complaints received (and resolved) through established Whistleblower process.
- Completion rates of Supplier Onboarding questionnaire.

Consultation process

BCPL's operations and supply chains are dependent on and overlap with Beca Australia. Accordingly, BCPL's risks have been considered and incorporated into the above statement, and no consultation is required.

HH2O has some overlapping and some independent supply chains with Beca Australia. Relevant HH2O management has been consulted with and it is agreed that HH2O's risks have been considered and incorporated into the above statement.

Other relevant information

[Ethics & Professionalism \(Code of Conduct\)](#)

[Whistleblower Statement](#)

[Health Safety and Wellbeing Statement](#)

[Sustainability at Beca](#)

This statement was approved by the board of Beca Australia on 29th August 2025.

Signature

Name

Position

Date

Andrew Mailer

Managing Director
Beca Australia

29th August 2025

**make
everyday
better.**