



Fugro Holdings Modern Slavery Act (2018) Compliance Report December 2023

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1. Introduction

Fugro Holdings (Australia) Pty Ltd and its subsidiaries Fugro Australia Pty Ltd, Fugro Exploration Pty Ltd, Fugro Australia Land Pty Ltd and Fugro Advance Pty Ltd, recognises and subscribes to the principle that freedom from slavery is a fundamental human right. We are committed to the UN Guiding Principles on Business and Human Rights, which state that entities have a responsibility to respect human rights in their operations and supply chains. This commitment includes taking action to prevent, mitigate and, where appropriate, remedy Modern Slavery in our operations and supply chains.

We believe that part of the intention of the Modern Slavery Act 2018 is to assist organisations like Fugro Australia engage with the topic and provide a context for the ongoing expansion and improvement of our capacity to prevent, mitigate and remedy Modern Slavery.

Today, we understand and are actively mitigating the potential for our business and operations to be linked to Modern Slavery, particularly through our supply chains, but also in our own practices and undertakings which are outsourced.

We have begun our journey in establishing our role in understanding and ultimately helping to eradicate Modern Slavery, and we are creating the tools needed to:

- identify our impacts both positive and negative;
- engage with our personnel and suppliers to detect instances and acts of Modern Slavery in our relationships;
- and to develop strategies and actions to deal with what we find.

This Statement has been prepared under the 'Guidance for Reporting Entities' provided by the Commonwealth Government and submitted to the Australian Border Force for publication pursuant to Section 16 (1) of the Modern Slavery Act.

The Statement was approved by the board of Fugro Holdings (Australia) Pty Ltd as the primary reporting entity and proprietor of the named reporting entities covered in the report, on 24 April 2024.



Simon Clode
Director Pacific
Fugro

2. Identifying and Describing the Reporting Entity (Reporting Criteria 1 & 2)

Identifying and Describing the Reporting Entity

Fugro Holdings (Australia) Pty Ltd is a wholly owned subsidiary of Fugro N.V. [Fugro] a globally active Geo-data specialist employing 11,009 people in 139 locations. Fugro originated and is headquartered in the Netherlands, the only country in the world to be awarded an 'A' rating for government response to Modern Slavery¹.

Fugro Australia operates primarily in Australia, New Zealand, and Pacific Islands. The company operates several wholly owned subsidiaries, as detailed in the chart below, which includes ACN numbers for the relevant entities.

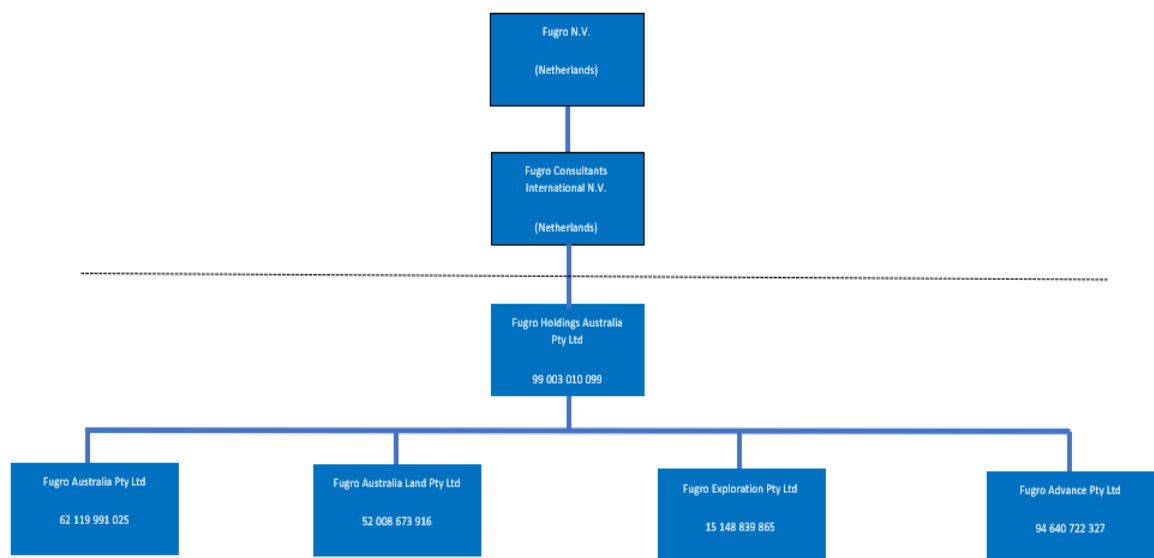


Figure 2.1: Fugro Australia organisation chart

¹ Global Slavery Index 2018 – Table 1 (p45).

During the 2023 reporting period, Fugro Australia included several other subsidiaries not shown in the organisation chart above. In 2023 Fugro Holdings has lowered the number of legal entities in operation. As with the subsidiary companies shown above, all the inactive subsidiaries are under the same leadership as Fugro Australia, with the same Directors and management. This ensures that all subsidiaries are operated according to the Fugro Values:

- We do what's right;
- We respect and include others;
- We stand firm and do the right thing;
- We speak up if situations aren't right or safe.

All current subsidiaries of Fugro Australia provide operational or administrative support in the delivery and provision of expertise and resources to our clients. Our services are categorised in four Business Lines, namely:

- Marine Asset Integrity (MAI);
- Marine Site Characterisation (MSC); and
- Land.

This group of services allows Fugro Australia to deliver successfully into a variety of markets including Oil and Gas, Mining, Infrastructure and Defence.

Fugro Exploration specialises in delivering Geo-data services to the exploration sector, particularly in oil and gas, and Fugro Australia operates the vessels, crews and onshore infrastructure that facilitate those services.

For the purposes of this document, Fugro Australia includes the primary holding company and all subsidiaries, as all operate under the same management and leadership, and share administrative and operational personnel.

2.1 Our Business

Fugro Australia is part of the international Fugro group, the world's leading Geo-data specialist. In Australia and the Pacific region, Fugro Australia employs approximately 600 people dedicated to collecting and examining comprehensive information about the Earth and the structures built upon it. Through integrated data acquisition, analysis, and advice, we unlock insights from Geo-data to help our clients design, build and operate their assets in a safe, sustainable, and efficient manner.

Fugro Australia's operations areas cover Australia, New Zealand, and the Pacific Islands, and as a market leader in survey and geotechnics we are respected for our unique combination of solutions that enhance the safety and efficiency of onshore and offshore oil and gas developments. We are also noted for our geospatial solutions, particularly 3D mapping and asset management services.

Fugro Australia operates several integrated offices and facilities across Australia:

- Perth / West Perth WA;
- Balcatta WA;
- Adelaide SA;
- Brisbane Qld.

In many cases our clients are large multinational corporations, as well as organisations such as the United Nations and Australian government entities which not only have well-developed Modern Slavery practices and approaches, they also demand high levels of awareness to the issue.

As noted above, Fugro Australia is an integrated business that shares common leadership and management, which guarantees uniformity in attentiveness of and responses to the issue of Modern Slavery.

Further information regarding Fugro's business activities and outcomes are available on request.

2.2 Our Suppliers

Working in the field of Geo-data, Fugro Australia personnel operate in environments of every kind within Australia, New Zealand, and the Pacific Islands. We use technology to collect data relating to geography, geology, topography, bathymetry, built environments and structures (interior and exterior). We collate and analyse the data collected to provide advice to help our clients make decisions pertaining to the development and ongoing management of their assets.

Our suppliers include those involved in the provision of the technical equipment we use, as well as business equipment ranging from IT and communications, to vehicles, vessels, drones and UAVs/USVs. Additionally, goods and services related to our facilities, administration, and corporate responsibilities such as travel, PPE and apparel are also acquired.

For the purposes of this document, we have compiled a list of all suppliers utilised during the reporting period, identifying our company risk profile. The table is shown in Section 3 (reporting Criterion 3) below. Most of the suppliers in this category are Australian based and operating in the specialised services sector, and as such we assess the risk of Modern Slavery in these companies as low. Purchasing locally wherever possible is a Fugro Australia policy and commitment, and as the table demonstrates, the great majority of our purchasing is conducted in the local economies in which we work. Some products we purchase are included on the Global Slavery Index high risk category:

- Clothing and apparel;
- PPE;
- Computers and laptops;
- Telephones;
- Labour hire;
- Security services;
- Logistics (transport and marine);
- Catering and hospitality;
- Building, construction, and fabrication.

For those items at high risk that we are compelled to purchase overseas, Fugro generally have long established relationships with reliable and reputable suppliers, and in many cases agreements with the suppliers. In cases where we change suppliers or are required to make ad hoc purchases, we conduct due diligence before commencing a new relationship. Consistent internal and external auditing of supplier relationships, including risk assessment, ensures that we remain well-informed of our regular suppliers' practices and approaches.

3. Describing the Risks of Modern Slavery Practices (Reporting Criterion 3)

Describing the Risks of Modern Slavery Practices in the Operations and Supply Chains of the Reporting Entity and any Entities the reporting Entity Controls or Owns

Understanding the risks of Modern Slavery practices in our operations and supply chains is a complex and demanding task. Since the previous reporting period Fugro Australia has commenced a supply chain assessment to identify opportunities and to mitigate risk across the company's supply chain, particularly to identify any risks that our actions or inactions may cause, contribute to, or be directly linked with Modern Slavery.

In plain terms, as an ethical company operating in an area of the world that is ranked very highly in terms of response to Modern Slavery, political rights, and civil liberties², we believed that our operations are almost certainly free of Modern Slavery or labour exploitation and continue to believe that Fugro is sufficiently engaged with the topic. However, in the pursuit of deeper engagement with the issue of Modern Slavery Fugro Australia is proactive in identifying any risk within the supply chain and taking appropriate steps in mitigating that risk.

As stated in the introduction, we believe that the purpose of the Act is to help raise awareness of the issues surrounding Modern Slavery, and to help us develop the strategies and tools to deal with it.

We have prioritised formal assessment of new suppliers and improved assessment of Modern Slavery practices across our operations and business relationships, with all suppliers utilised within the period now being subject to supply chain mapping and formal risk identification.

To comply with the mandated reporting, in this section we provide an analysis prepared utilising the *Commonwealth Modern Slavery Act – Guidance for Reporting Entities*, and the *Global Slavery Index 2018*.

² Global Freedom Scores as defined and ranked by Freedom House. <https://freedomhouse.org/countries/freedom-world/scores>.

3.1 Our Operations

Fugro Australia provides technical services to a wide range of clients in Australia, New Zealand, and the Pacific Islands. We deploy highly qualified personnel to various land-based and offshore facilities to conduct asset integrity and site characterisation related services.

As such, we consider that there is minimal potential for our operations to cause or contribute to Modern Slavery. However, we are aware that areas of vulnerability may exist in services we outsource, including vessel hire and crewing, transport and logistics, security, catering and hospitality, cleaning and facilities management, the purchasing of PPE and apparel, and in cases where local labour is hired to assist in operations.

Given that we award contracts for most of these goods and services based on tenders and quotations that include due diligence of the vendors and suppliers, we assess that the risk of our operations causing or contributing to Modern Slavery across these categories continues to be low.

3.2 Our Suppliers

The tables below provide insight into the types of goods and services, and countries, of operation of Fugro Australia’s suppliers, and our assessment of the risks of their activities causing or contributing to Modern Slavery.

As noted above, this assessment is based on information found in *Commonwealth Modern Slavery Act – Guidance for Reporting Entities*, and the *Global Slavery Index 2018*. In the 2023 reporting period, we have expanded the assessment information to include the complete company supply chain and have started formal supplier engagement, including Supply Chain Assessment Questionnaires, to ensure compliance.

Table 3.1: Fugro Australia Suppliers – Risk Assessment by country of operation

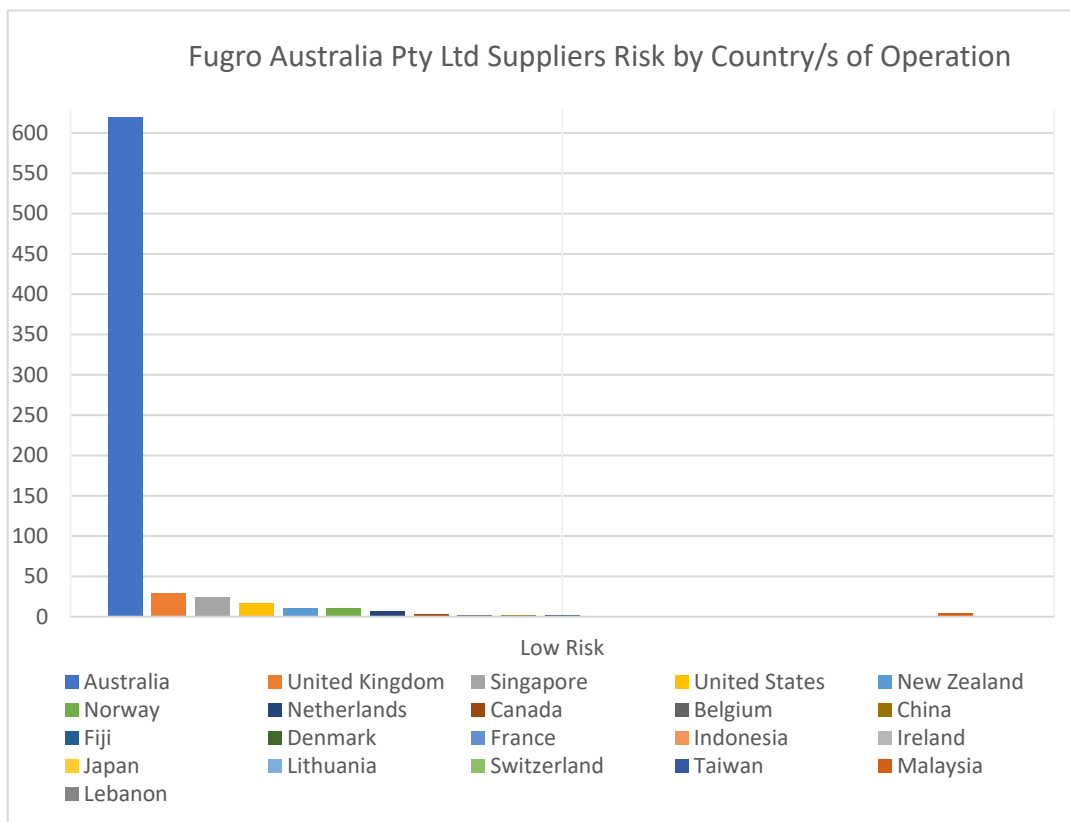


Table 3.2: Fugro Australia Suppliers – Volume of Purchases by country of operation

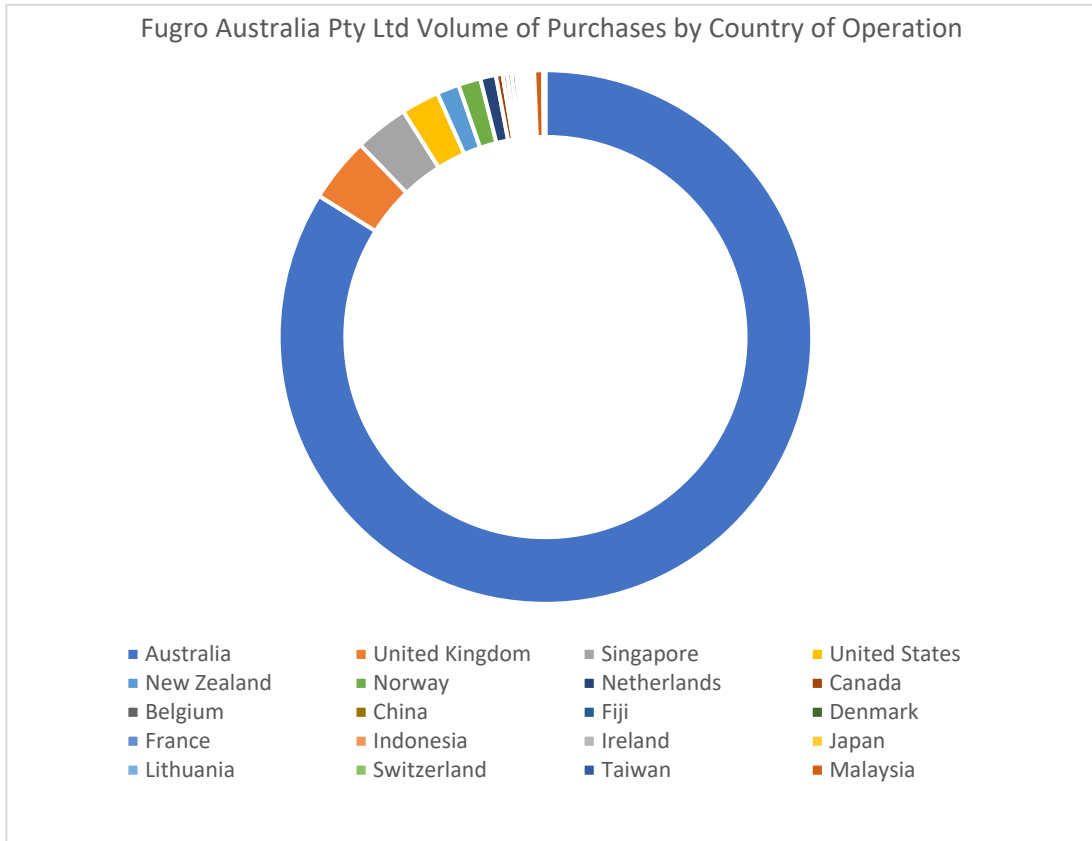


Table 3.3: Fugro Australia Suppliers – Risk Assessment by product / service category

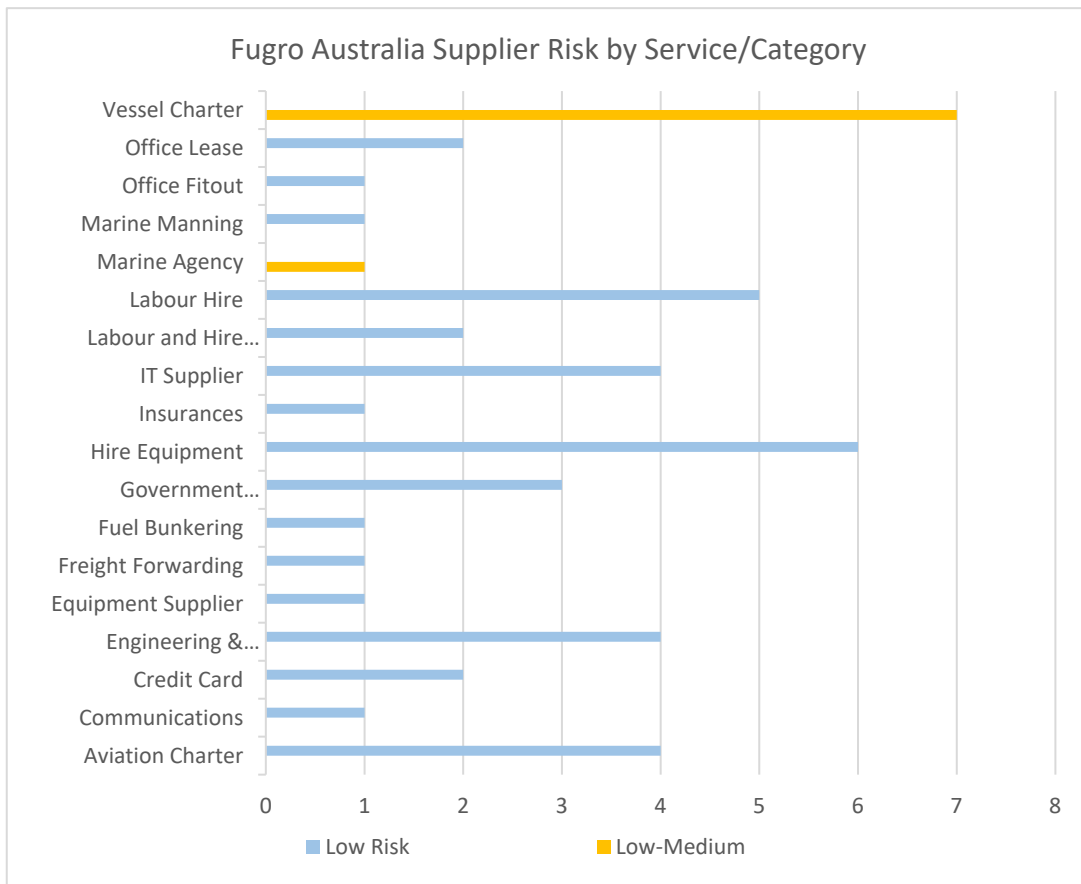
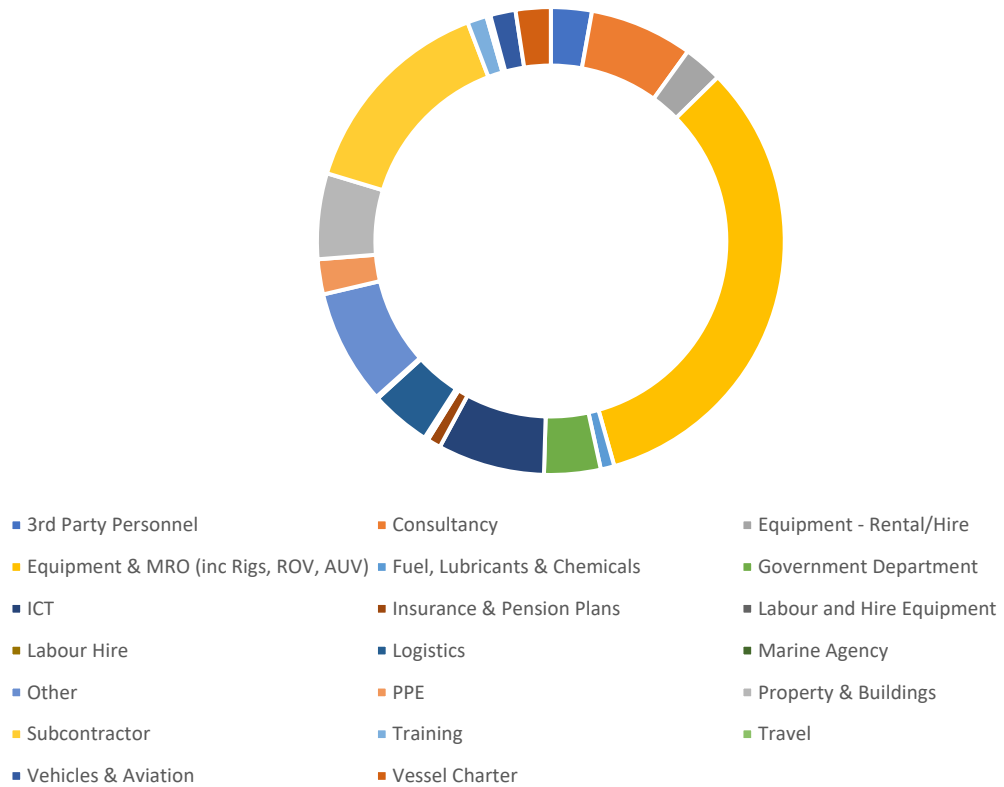


Table 3.4: Fugro Australia Suppliers – Volume of Purchases by product / service category

Fugro Australia Suppliers by Product/Service Category



3.3 Looking Forward

Participation in the provisions of the Act has provided the Fugro Australia team a positive framework for actions that have been taken to assess and control the risk of our operations or purchases causing, contributing to, or linking us to Modern Slavery. Further progress will be made in the next reporting period in implementing policies and actions that will assist in assessing the risks associated with our activities and business relationships, including:

- Establishing a Working Group on Modern Slavery;
- Implementation of a formal risk assessment structure and refining our supplier assessments;
- Investigating traceability processes to improve our understanding of the sources of products and the raw materials used in them;
- Working with peer companies in our sector to share information and findings, and possibly collaborate on risk assessments of high-risk parts of the supply chain.

4. Actions Taken by the Reporting Entity (Reporting Criterion 4)

Describe the Actions taken by the Reporting Entity and any Entities that the Reporting Entity Owns or Controls to Assess and Address these Risks, including Due Diligence and Remediation Processes

In line with our Group's values and principles, we are committed to acting ethically and with integrity in our business relationships. We seek to establish and adhere to clear ethical standards for ourselves and foster similar standards in third parties who work with us or on our behalf.

We have zero tolerance of slavery and human trafficking in all their different forms and are committed to implementing and enforcing effective systems, and controls, to ensure slavery and human trafficking are not taking place anywhere within our business or supply chain.

4.1 Our Policies

Respect for human rights is embedded in Fugro's values and in the Fugro Code of Conduct. Fugro's Policy on Human Rights explicitly forbids any form of slave, forced, bonded, indentured, or prison labour. Fugro's values, Code of Conduct and Policy on Human Rights apply equally to the actions of Fugro companies, and to our conduct as individuals.

Remuneration for employees and temporary workers is consistent with the provisions of applicable wage laws, collective bargaining agreements and ILO standards. Where relevant, international maritime standards are upheld (e.g. Maritime Labour Convention standards).

Our global Speak Up Procedure enables Fugro employees, temporary workers, contractors, and other business partners, such as suppliers and customers, to raise concerns and report instances of potential non-compliance in complete confidence. Anyone using the Speak Up Procedure is guaranteed protection against retaliation.

Information on our Code of Conduct, related policies and Speak Up Procedure is provided to employees globally and published on our company intranet.

4.2 Suppliers and Partners

Fugro seeks to work with suppliers and other business partners who contribute to sustainable development and are environmentally and socially responsible. Pre-qualification procedures, such as supplier questionnaires, are part of our supply chain compliance program. Where applicable, these include questions on the supplier's controls regarding the human trafficking and slavery laws.

Fugro maintains a Supplier and Partner Code of Business Principles (Supplier and Partner Code). This obliges suppliers and partners to comply with all applicable laws and regulations, including, inter alia, those regarding slavery and human trafficking, to treat workers fairly, to provide a safe and healthy work environment and to eliminate all forced, compulsory and child labour.

Fugro can audit compliance with the Supplier and Partner Code; failure to adhere to it may lead to immediate termination of the business relationship with the supplier, or the introduction of compulsory improvement plans.

We work with our suppliers of materials at global and country level to include the Supplier and Partner Code in our contracts with them. Specific actions taken in the reporting period notably include the completion and application of a Supplier Questionnaire, which requires, amongst other questions, the following:

- Details of the countries and regions in which the supplier operates;
- Reporting of past, current, pending or threatened investigation or prosecution for bribery and other corruption;
- Copies of the respondent's Approved Supplier List and Supplier Management Procedure;
- Sharing of supplier records including audit reports, site visits and statistics;
- Information regarding materials traceability and identification across areas such as fabrication, rigging, consumables, equipment hiring, and services hiring.

In addition, our Supplier Account Set-up invites suppliers to act as a Partner in our Code of Business Principles and if the supplier refuses, they are asked for reasons for the refusal.

During the reporting period, Fugro Australia engaged with several major stakeholders regarding Modern Slavery, activities included:

- Visiting and auditing several maritime and logistics suppliers;
- Provided information regarding Fugro's Modern Slavery approach to clients and potential clients within tendering and project documentation;
- Signing client contracts which included a section and clauses related to Modern Slavery.

4.3 Suppliers and Partners: Vessels

While a substantial proportion of crew working on Fugro vessels are employed directly by Fugro, we also work with crewing agents. We are aware that this entails higher risks to labour rights and in 2023 continued to implement means to reduce these risks. In addition to gradually reducing the number of agents, such control processes include an increased focus on human slavery risks in the selection and contracting process, audits, and checks with seafaring crew.

4.4 Training

A worldwide mandatory Code of Conduct training program is in place to ensure awareness throughout Fugro of the need to act with integrity and do business responsibly.

4.5 Looking Forward

In the next reporting period, we expect to have made further progress in implementing policies and actions that will assist in addressing the risks associated with our activities and business relationships, including:

- Reviewing and where necessary updating due diligence, for example including a requirement for statements and policies specifically related to Modern Slavery in Requests for Tender (RFTs) and Requests for Quotations (RFQs);
- Engaging more with suppliers on the issue and potentially intensifying screening and qualification procedures;
- Developing a clear method for identifying, assessing, and classifying actual and potential human rights risks;
- Reviewing Fugro's Speak Up program to determine whether it sufficiently covers the issue of Modern Slavery, and if identified, recommending changes that make it more effective in this area;
- If necessary, creating a separate remediation process related strictly to Modern Slavery.

5. Assess the Effectiveness of Actions Taken (Reporting Criterion 5)

Describe How the Reporting Entity assesses the Effectiveness of Actions being taken to Assess and Address Modern Slavery Risks

Fugro Australia undertakes regular internal and external auditing of its practices and business relationships to assess adherence to our policies and regulatory compliance requirements.

Given the company's renewed awareness of the issue through compliance with the Act, a plan is being formulated to introduce more robust effectiveness assessment measures, including:

- Mandating that the Working Group on Modern Slavery regularly review the actions taken to assess risks, identify instances and incidents involving Modern Slavery, and the remediation processes developed;
- Engagement with suppliers to review their risks and responses to Modern Slavery, and entering into discussion to verify the effectiveness of our actions vis a vis their responses to Modern Slavery;
- Putting in place measures to track awareness of and compliance with our actions in the Modern Slavery space, including assessing the effectiveness of internal education and training;
- Reviewing and, if necessary, updating training programs, or creating training and education modules specific to Modern Slavery.

No incidents or practices that could be described as causing Modern Slavery have ever been reported in any Fugro Australia operations, and while we are aware of the risks of contributing to or being linked to Modern Slavery practices through our supply chain, we are not aware of any such incidences for the reporting period.

Reviewing the Speak Up program to determine whether any complaints or grievances related to Modern Slavery reveals that no such complaints or grievances were made during the reporting period.

6. The Process of Consultation (Reporting Criterion 6)

Describe the Process of Consultation with any entities the Reporting Entity Owns or Controls

As stated in Criterion 1/2, Fugro Australia operates several subsidiary companies – in all cases the same Directors provide leadership, and the management of these companies is undertaken by the Fugro Australia management team. As these entities all operate under the same direction and governance, and all have committed to abide by the Purpose and Values articulated by Fugro N.V. (see Criterion 7 below), for the purposes of this document Fugro Australia encompasses all entities.

7. Any Other Relevant Information (Reporting Criterion 7)

Any Other Relevant Information

7.1 About Fugro

Fugro N.V., the parent company and 100% proprietor of Fugro Australia, was established in 1962 by Kees Joustra, a pioneer of the cone penetrometer test (CPT), a revolutionary geotechnical soil testing technique. Joustra created a niche for the company by successfully combining the practice of soil analysis with the theory of advice on foundation design and set Fugro on a path of growth and success.

Today, as the global leader in site characterisation and asset integrity, Fugro offers integrated services anywhere in the world, employing some 11,600 people in 61 countries. Delivering complex, high-profile projects, the company dominates specific market segments in selected countries and regions.

7.2 Our Purpose

Our planet is extremely complex and continuously changing. Understanding this complexity is essential to build and maintain assets in a responsible manner. Fugro's expertise is essential to create a safe and liveable world.

We are living in a period of intense and accelerating change. Over the coming decades, population growth, increasing wealth and urbanisation will lead to an increasing demand for energy, water, food, minerals, metals, buildings, industrial plants, and infrastructure. At the same time, technology is changing faster than ever before, affecting virtually every industry, and opening new opportunities for different, more effective ways of working.

These global trends also lead to massive challenges for the world, most notably climate change. Therefore, the future cannot just be about more; it also must be about better. The energy mix, infrastructure and built environments must evolve if tomorrow's problems are to be tackled successfully.

Through our integrated and digital solutions, we support clients in dealing with the challenges of today and tomorrow. Fugro provides the essential data, analysis, and advice that our clients rely on to realise and operate their construction projects and infrastructure more safely, sustainably, and efficiently. We sometimes play a small role in a client's project, but it is always critical.

7.3 Our Values

Our values guide us in fulfilling our purpose as an organisation: together we create a safe and liveable world. While each value has a distinct role to play, they are linked and equally important. We live by our values and their sum is our collective strength as a company.

Our values represent what we stand for:

We are determined to deliver:

- We make sure we understand what is needed;
- We deliver by working together, enthusiastically;
- We keep everybody informed on our progress.

Our customers know that they can rely on us to provide meaningful solutions to their challenges. We get the best out of ourselves to deliver constant Fugro quality to all our stakeholders. The strong connections within Fugro, our team orientation and determination help us succeed.

We build trust:

- Trust begins by giving trust;
- We act with candour and courage;
- We help others succeed.

Trust is at the heart of our lives, whether at home or at work. We trust each other at Fugro, as it is what holds us together. Without trust, transparency, and honesty we will never be able to find lasting success. Trust is earned by actions, not words. Our clients and other stakeholders recognise us as a trusted partner. Our personal success lies in being comfortable to ask for help when needed.

We prepare for tomorrow:

- We believe our future success starts with doing our best work today;
- We learn from today to prepare ourselves for the future;
- We embrace change as it brings opportunity.

The world around us is changing fast and we constantly adapt to these changes. We want to contribute to a bright future for the world we live and work in. We believe challenges are here to be addressed. Things that worked fine until today, might need improvement tomorrow. We learn from situations where something went wrong. Tomorrow starts today: share ideas, ask for feedback and act now to help build a stronger Fugro.

We do what's right:

- We always respect and include others;
- We stand firm and do the right thing;
- We speak up if situations aren't right or safe.

Doing what's right is crucial to us. We demonstrate courage in doing the right thing and together create a healthy and productive working environment. We always do what's right for Fugro, for our clients, for ourselves and everyone and everything around us. Above all, we respect others regardless of who they are.