

2020 Modern Slavery Annual Statement

For the period ending December 31 2020



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1. Introduction

This Statement is made by CSE-Global (Australia) Pty Ltd (ABN 85 109 958 090) and each of its wholly owned subsidiaries (together CSE) under the Modern Slavery Act 2018 (Cth) (Act) for the financial year ending December 31 2020. (CSE's financial reporting being January to December each year.)

This is CSE's first Statement under the Act. This statement details the steps we have taken to assess modern slavery risks within our business and supply chains and the actions implemented in FY 2020 to minimise those risks.

The Statement covers CSE Global (Australia) Pty Ltd (the holding company) and the following business entities:

CSE Crosscom Pty Ltd

CSE Uniserve Pty Ltd

CSE New Zealand Limited

RCS Telecommunications Pty Ltd

2. About CSE

In Australia and New Zealand (ANZ), we have offices located in WA, NT, NSW, VIC, TAS, SA, Auckland, Wellington, plus regional offices throughout some Australian States.

Our technology areas are electrical, automation, instrumentation, and telecommunications. We provide engineering, integration, product sales, rental systems and maintenance to customers operating in the oil and gas, mining and refining, transportation, utilities, healthcare, security, and construction industries.

3. Our Structure and Operations

Our headquarters for the ANZ region are located in Perth, WA.

Our employees are engaged on standard employment contracts, aligned to awards operational within our industries.

98% of our employees are on full-time/part-time permanent employment arrangements with the balance being casual employees.

The tables below represent our employees by Business Unit and employment category. We currently have one employee working under a visa.

Figure 1 - Employee Ratio broken up by Business Unit

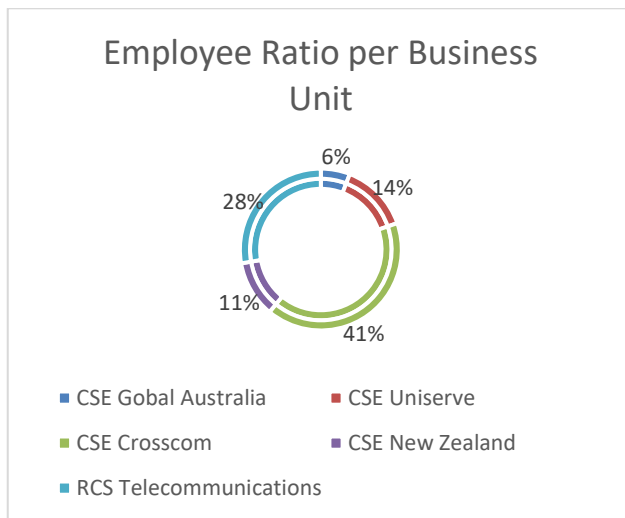
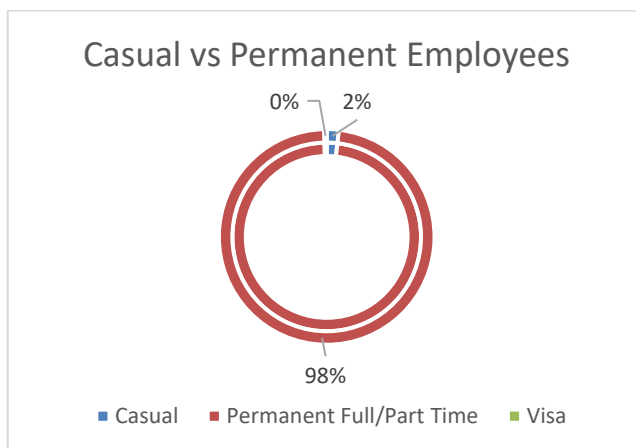


Figure 2 - Casual vs Permanent Employees



3.1. Governance

CSE are 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.

During 2020, CSE put in place 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), consists of subject matter experts such as Head of People and Culture, HSE Manager, Quality and Business Improvements Manager, IT Manager, Group Finance Manager and Group Commercial Manager. During 2020, Modern Slavery risk management was incorporated into the function of the BCPG. The BCPG meet once a month with Modern Slavery forming part of the regular agenda.

4. CSE Policies

CSE has implemented policies and procedures that work towards mitigating the risks of modern slavery and human rights abuse within our organisation.

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

1. Implementation of a **Human Rights Framework**. A framework that demonstrates our commitment to attaining a culture that fosters and promotes the human rights of our people, suppliers, customers, communities, and other stakeholders.
2. Our **Bullying, Harassment and Discrimination Policy** ensures our employees can attend work in an environment that is positive, supportive, and safe.
3. 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 qualified through our due diligence and self-assessment programs.
 - e. Standard employment contracts in line with *Fair Work Act (2009)*.
4. We have a **Code of Business Ethics Policy (COBE)**, which is reviewed annually and distributed to all employees. We require all employees to read the guidelines and complete a COBE declaration every twelve months to identify and declare any possible conflicts of interest. Matters covered include fraud, bribery, corruption, and theft.
5. 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 protected environment.
6. Our **Procurement Manual** ensures that our supply chain due diligence has been conducted on all new suppliers and subcontractors prior to engagement.

5. Taking Actions to Address the Risks

5.1. Supply Chain

In FY 2020, we procured approximately \$74m of goods and services from our supply chain.

The largest proportion of goods procured, approximately \$44m, was for products from global manufacturers. Other key procurement activities are:

- Insurances
- IS&T
- Professional Services
- Property
- Travel

We have implemented a Self Assessment Declaration which must be completed by our supply chain partners. The declaration provides us with the information we use to help understand, identify, and mitigate against modern slavery and human rights abuse within our supply chain.

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*.

We will undertake audits annually, where we will seek evidence that our supply chain is working towards measures that identify and mitigate against modern slavery and human rights abuse.

Our Supplier Agreements include arrangements that require our suppliers under to comply with the *Modern Slavery Act (2018)*.

5.2. Workforce

At the time of writing, we employ 274 people. Through our People and Culture Team (P&C Team), we ensure we recruit the right people for business and that we provide the right environment for our people. The P&C Team is responsible for delivering the framework that encourages our staff to develop and participate in our vision, values and culture. We aim to ensure that all employees are empowered to contribute and make a difference.

The workforce includes a mix of engineers, technicians, management, finance, and administration personnel, as well as apprentices and trainees. In our opinion, we consider the risk of CSE contributing to Modern Slavery through our employees as being 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 prevent any risk of Modern Slavery.

5.2.1. Training

Our human rights and modern slavery program are dependent on the practical understanding of our people. During 2020, CSE embarked on delivering several training events for our employees.

Our executive and management team have undergone training to ensure they have a good understanding of the requirements of the *Modern Slavery Act 2018 (Cth)*, and how to support CSE in its endeavors to implement and communicate new and changed policies.

Our new employee inductions include a section on Modern Slavery to inform new employees about our policies, procedures, corporate social responsibility and how to identify and report suspicious activity.

5.2.2. Labour Hire

Labour hire within CSE is very low (below 0.5% of our total workforce).

Labour hire agencies must be recognised as a CSE approved supplier and have completed and passed all modern slavery checks before being engaged.

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

6. Measuring our Actions

While the actions and mechanisms around implementing the requirements of the *Modern Slavery Act (2018)* are still relatively new, we have embarked on implementing a tracking system with the view to assess the effectiveness and impact of our actions. The table below represents our actions and measures:

Table 1 - Modern Slavery Measures & Assessment

AREA	ACTION	MEASURE
Governance	<ul style="list-style-type: none"> Employee training Policy reviews Supply chain management and disclosure Board approval and oversight Agreements/Contracts New Supplier and Subcontractor forms 	<ul style="list-style-type: none"> # of team trained Annual review of policies and procedures Quarterly review of supply chain declarations Six monthly reports to the Board of actions to date All Agreements/Contracts to contain modern slavery commitments. All new supplier and subcontractor forms to contain modern slavery commitments.
Review	<ul style="list-style-type: none"> Internal audits Supplier self-assessment questionnaire 	<ul style="list-style-type: none"> Include modern slavery into our internal audit procedure with 100% compliance Monitor self-assessment questionnaires for 100% compliance
Risk	<ul style="list-style-type: none"> Enterprise Risk Register Supply chain entry 	<ul style="list-style-type: none"> Annual risk assessment Review of supply chain onboarding paperwork 100% compliance
Reporting	<ul style="list-style-type: none"> Cases raised Channels used to raise the cases 	<ul style="list-style-type: none"> Total number of cases reported internal and/or external Mechanisms used to raise a case (Whistle-blower or open reporting)

7. Approval and Signature

This statement was distributed and approved by the board of CSE-Global (Australia) Pty Ltd on 28th June 2021.



William Roy Rowe
Chief Executive Officer
CSE Global (Australia) Pty Ltd
12th July 2021



CSEAustralia