

AURECON LIMITED

Modern Slavery Statement

FY2020



aurecon

*Bringing ideas
to life*

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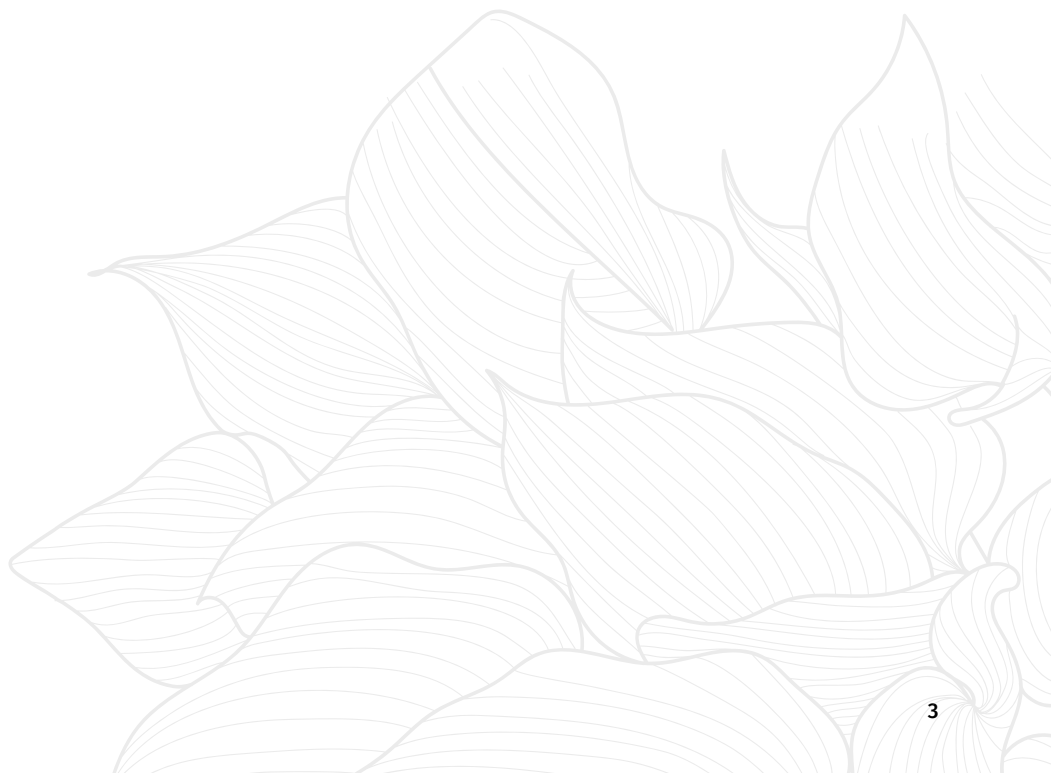
Introduction

This Modern Slavery Statement is submitted pursuant to the reporting requirements of the Modern Slavery Act 2018 (Cth) (the Act) for the financial year ending 30 June 2020.

Our business comprises a number of different corporate entities including Aurecon Limited ACN 156 139 847 (the ultimate parent company), Aurecon Group Pty Ltd ACN 133 838 187 and Aurecon Australasia Pty Ltd ACN 005 139 873 (our largest subsidiaries). All three entities meet the reporting threshold requirements of the Act and are required by law to lodge a statement annually. We have produced one Statement on behalf of Aurecon Limited, Aurecon Group Pty Ltd and Aurecon Australasia Pty Ltd, who meet the mandatory reporting requirements of the Act, as well as other entities that these companies own or control (“Aurecon Group”). Please refer Appendix A for a list of the Aurecon entities covered by this report.

This is Aurecon’s first statement under the Act and details the steps Aurecon has taken to assess the modern slavery risks within its operations and supply chains and the specific actions implemented in FY2020 to address those risks.

Aurecon acts with integrity in its operations and is committed to addressing modern slavery in its supply chain whilst continuously working on strategies to mitigate modern slavery and ethical sourcing risks.



About Aurecon

Aurecon is an engineering, design, and advisory company operating in the markets of aviation, construction, data and telecommunications, defence and national security, education and research, energy, Government, health, manufacturing, property, resources, transport and water. Aurecon's history began in 1934 when MacDonald Wagner formed in Sydney, Australia. In 1989, a merger with the Connell Group formed Connell Wagner. The Aurecon brand was created in 2009, through a merger of Connell Wagner with two African based businesses.

Aurecon is committed to operating with regard to its corporate social responsibility commitments – sustainability and climate change, ethics and integrity, diversity and inclusion, gender equality, inclusive leadership, Indigenous inclusion, and anti-bribery and anti-corruption, human rights, modern slavery and prevention of family violence. The health, safety and wellbeing of our people, our clients and their families is always our priority. Aurecon has made a commitment to support the Ten Principles of the United Nations Global Compact on human rights, labour, environment and anti-corruption. This includes a commitment to work towards addressing the risk of modern slavery in our operations and supply chain. We are committed to making the Ten Principles a part of our strategy, culture and day to day operations.

Our Organizational Structure

At Aurecon we believe humanity depends on engineering; and we recognise that we have a broader stewardship role to play. The Board is responsible for the overall corporate governance of Aurecon and the company's business strategy. Reporting to the Group CEO is a management team spanning regions, industries and service groups to ensure that, in addition to pursuing the strategic direction set by Aurecon's board, our behaviour in the market aligns with our corporate values.

Risk Management Framework

Aurecon is committed to the effective management of risk which is integral to our strategy and business objectives. As part of embedding robust risk management in Aurecon, we aim for our leaders to have a mature risk culture. This involves having visible leadership that identifies risks and opportunities, ensuring we align to our corporate values, whilst protecting our reputation within Aurecon's traditional businesses, new and emerging markets, technologies and integrating our future ready initiatives. The Aurecon board requires risk management performance to be monitored, reviewed and reported throughout Aurecon.

Policy Framework

Aurecon's response to addressing modern slavery falls within its approach to protecting human rights. The below documents form part of that approach and outline the standard of conduct and behavior it expects of its Directors, employees, contractors, partners and suppliers and ways to report behavior that does not fall within those expectations:

Code of Conduct and Ethics
Sustainability Policy
Whistleblower Policy

Our Operations and Supply Chain

Aurecon is a multinational company. At the start of the 2020 financial year, Aurecon was operating in Australia, New Zealand, Asia, Africa and the Middle East with 7,630 employees globally. On 31 December 2019, Aurecon demerged from the Africa business and on 20 November 2020 Aurecon divested the Middle East business. The list of entities for each region are listed in Appendix A but given the recent demergers, this statement focuses on the remaining business across Australia, New Zealand and Asia.

Within the remaining regions, Aurecon has 5,408 employees and its main operations include engineering, design and advisory services. Aurecon's supply chain is split into the following three categories:

1. Corporate including the purchase of goods and services used for day-to-day business operations such as external advisory and professional services, staff training, cleaning services and personal protective equipment;
2. IT including the purchase of IT infrastructure and equipment; and
3. Projects including the engagement of subconsultants.

Procurement and sourcing of goods and services are governed by the Aurecon Procurement Policy, relevant Procurement Guidelines and Procurement Matrix and we seek to work with reputable partners building long-term partnerships.

We have mapped our Australian and New Zealand supply chain. The top five categories in which our supply chain operates are:

1. Engineering activities and related technical consultancy services;
2. Business management consultancy services;
3. Architectural services;
4. Other Financial Services; and
5. General public administration.

We remain focused on addressing the risks of modern slavery within our supply chain and will continue to map our supply chain through our supplier screening process.

Identification and Assessment of Modern Slavery Risks in our Operations and Supply Chain

Aurecon is committed to eradicating the risk of modern slavery and has an established procurement process for the engagement of external suppliers. All suppliers and subcontractors are subject to an evaluation and assessment procedure prior to any approval, engagement and/or contract execution.

In response to the Act, Aurecon has established a Modern Slavery Working Group, comprising management from Legal, Facilities, Procurement and business operations, who report to the Chief Legal Officer. The Working Group has developed a Modern Slavery Framework designed to address the risk of modern slavery and to remediate identified instances of human rights and modern slavery abuses in our operations and supply chain.

Our Modern Slavery Framework includes the following components:

1. Assessing the risk of modern slavery in our operations and supply chains by screening new and current suppliers;
2. Updating our new supplier registration questionnaire to include modern slavery provisions;
3. Reviewing and drafting corporate policies that address modern slavery and providing guidance for employees and suppliers on how to disclose to and/or notify Aurecon of instances of modern slavery or modern slavery risk;
4. Developing training to educate both employees of Aurecon and also suppliers and subcontractors that we work with on modern slavery, its risks and the need to notify and/or disclose instances of modern slavery;
5. Reviewing and amending our standard form contracts to include modern slavery provisions that require our suppliers to identify modern slavery risks in their supply chain, to notify Aurecon if they become aware of instances of modern slavery and to share information regarding any identified modern slavery risks; and
6. Developing a remediation plan to address the risk of modern slavery. This includes an internal process for referral where a risk of modern slavery has been identified and the formulation and execution of a corrective action plan with the relevant supplier.

To effectively screen new and current suppliers, Aurecon is in the process of implementing Compliance Catalyst, our digital screening platform. Compliance Catalyst assesses each supplier, its directors, and related companies against several international and government databases for human rights and other ethical supplier related violations including bribery and corruption. The software also provides a specific modern slavery risk rating by screening suppliers by their geographic location and industry sectors through reliance on data from the Global Slavery Index. After the initial risk assessment, the software will automatically alert Aurecon in respect of any new risks or issues that arise in respect of its suppliers.

Aurecon has identified that there are areas within its supply chain which may present a higher risk of modern slavery including:

1. Goods or services from a geographic region that presents a high risk of modern slavery;
2. Construction services where there are multi-layered tiers of supply chains which may involve labour from countries that are poorly regulated;
3. Office equipment where parts are sourced from regions where there is a higher risk of modern slavery; and
4. Facilities management where certain subcategories such as cleaning services may be subject to inappropriate labour practices.

FY 2020 Highlights

In the financial year ending June 2020, Aurecon has taken several steps to develop its Modern Slavery Framework.

In FY2020, Aurecon:

1. Issued a Modern Slavery Mission Statement that was reviewed and approved by the Chief Risk Officer;
2. Established a Modern Slavery Steering Committee comprising management from the Legal, Procurement, IT, and Finance teams tasked with the set up and implementation of our third-party digital platform Compliance Catalyst;
3. Revised its supplier due diligence process by onboarding Compliance Catalyst which performs a risk assessment of current suppliers and onboarding suppliers;
4. Established the Modern Slavery Working Group which has created the Modern Slavery Framework and is tasked with the development and implementation of that framework;
5. Updated its new supplier registration questionnaire;
6. Reviewed its current corporate policies and code of conduct and identified a need for a modern slavery policy. This policy will link to Aurecon's current policies which support Aurecon's position on human rights;
7. Identified a need to update its standard form contracts to include modern slavery provisions; and
8. Developed a remediation plan. This plan will be formalised and published in Aurecon's modern slavery policy.



Assessing Effectiveness

Aurecon's Modern Slavery Framework represents Aurecon's ongoing commitment to addressing modern slavery risks in its operations and supply chain.

Aurecon's Modern Slavery Working Group will annually review:

1. Our supplier risk software tool and how it is being implemented and used;
2. Our supplier due diligence assessments and how they are being conducted and reported;
3. Our supplier questionnaire to ensure the modern slavery questions do not need updating;
4. Any reports made including through our whistleblower process;
5. Our modern slavery training and knowledge:
 - a. Including how many employees have completed the training and whether further work is needed to create additional awareness; and
 - b. Whether any changes are required due to changes in recommended best practice; and
6. How Aurecon addressed any identified suppliers where their supply chain contained risks of modern slavery.

Consultation with other entities owned or controlled by Aurecon

Aurecon recognises that each entity within the Aurecon Group has a role to play in addressing modern slavery risks. The Aurecon Group has 21 entities across Australia, New Zealand and Asia (refer Appendix A for list of entities covered by this report). Aurecon has consulted with key areas of the business to prepare this statement, including Procurement, Legal and Governance.

These teams operate across all regions of the Aurecon group. The Statement was drafted in consultation with the Chief Legal Officer and Chief Risk Officer and the final statement was presented to and approved by the Board. All entities have received a copy of the statement and are aware of Aurecon's commitment to addressing modern slavery risks. Aurecon is developing a process to facilitate a deeper level of consultation with its related entities.

Looking forward – FY 2021 planned actions

Aurecon continues to collaborate with external parties, including its suppliers, regarding modern slavery to share knowledge and learnings as well as discuss approaches to this global issue. Aurecon wants to ensure its approach to this new area of compliance appropriately addresses the intention of the new legislation and aligns with Aurecon’s overall strategy to build and maintain an ethically sustainable business.

As part of its ongoing commitment to eradicating risks of modern slavery in its supply chain, Aurecon has the following actions planned for FY2021:

1. Continue supplier screening through Aurecon’s supplier risk software including issuing a supplier questionnaire where a risk is identified;
2. Publish internal modern slavery policy;
3. Develop internal training on modern slavery;
4. Follow remediation process for some of our high-risk suppliers identified including working with supplier to create a corrective action with an agreed timeline for implementation; and
5. Publish amendments to Aurecon standard contracts incorporating modern slavery clauses.

This statement was approved by the board of directors on 12 March 2021.

William Cox
Chief Executive Officer

Appendix A

Aurecon entities covered by this report

Aurecon Limited	ACN 156 139 847 Address: Level 8, 850 Collins Street, Docklands, VIC 3008
Aurecon 37 Holdings Pty Ltd atf The Aurecon 37 Trust	ACN 161 347 913 Address: Level 8, 850 Collins Street, Docklands, VIC 3008
Aurecon 37 Investments Pty Ltd	ACN 616 660 569 Address: Level 8, 850 Collins Street, Docklands, VIC 3008
Aurecon Group Pty Ltd	ACN: 133 838 187 Address: Level 8, 850 Collins Street, Docklands, VIC 3008
Aurecon Australasia Pty Ltd	ACN 005 139 873 Address: Level 8, 850 Collins Street, Docklands, VIC 3008
Aurecon Group Brand Pty Ltd	ACN 135 557 498 Address: Level 8, 850 Collins Street, Docklands, VIC 3008
Aurecon Advisory Pty Ltd	ACN 133 656 419 Address: Level 8, 850 Collins Street, Docklands, VIC 3008
Aurecon New Zealand Limited	Company Number: 328517 Address: Level 8, Spark Central, 42-52 Willis Street, Wellington, 6011, New Zealand
Aurecon MEA Pty Ltd	ACN 001 305 095 Address: Level 8, 850 Collins Street, Docklands, VIC 3008
Aurecon Singapore (Pte.) Ltd.	Company Number: 197700873R Address: 152 Beach Rd, #22-02 Gateway East, Singapore 189721
Engineering Insurances Pte Ltd	Company Number: 200206346D Address: 152 Beach Rd, #22-02 Gateway East, Singapore 189721
PT Aurecon Indonesia	Company Number: 02.193.917.8-058.000 Address: Alamanda Tower, Jakarta, 24th Floor, Unit C, Jl. TB. Simatupang Kav. 23-24, Cilandak Barat, RT.1/RW.1, Cilandak Bar., Kec. Cilandak, DKI Jakarta, Daerah Khusus Ibukota Jakarta 12430, Indonesia
Aurecon Holding (Thailand) Co Ltd	Company Number: 0105543111583 Address: Pakin Building 11th Floor 9 Ratchadapisek Road Bangkok 10400, Thailand

Aurecon Consulting (Thailand) Co., Ltd.	Company Number: 0105544003369 Address: Pakin Building 11th Floor 9 Ratchadapisek Road Bangkok 10400, Thailand
Aurecon Hong Kong Limited	Company Number: 1273352 Address: Manulife Financial Centre Tower B, Unit 1608 16/F, 223 – 231 Wai Yip St, Kwun Tong, Hong Kong
Aurecon Consulting Philippines Inc	Company Number: CS201612546 Address: Level 3, South Wing, The Estancia Offices, Capitol Commons, Meralco Ave cor Shaw Boulevard, Pasig City, 1600 Metro Manila, Philippines
Aurecon Macau Limited	Company Number: SO 45982 Address: Alameda Dr. Carlos D'Assumpção No. 263, Edifício China Civil Plaza, 6 andar M & N, Macao
Aurecon Engineering Consulting (Shanghai) Co. Ltd	Company Number: 3100105135 Address: Room 606, Level 6, Building G, No.9335 Hu Min Road, Vanke Centre (Xuhui) Shanghai 200235
Aurecon VietNam Co Ltd	Company Number: 0102193946 Address: Suite 1304, Centec Tower, 72-74 Nguyễn Thị Minh Khai, Phường 6, Quận 3, Hồ Chí Minh, Vietnam
Aurecon PNG Limited	Company Number: 1-80254 Address: C/o Ashurst PNG – 11 th Floor, MRDC Haus, Cnr Musgrave Street & Champion Parade, Port Moresby NCD, Papua New Guinea
Aurecon Malaysia Sdn Bhd	Company Number: 345646-X Address: C/O 43-2 Plaza Damansara, Jalan Median Setia 1, Bukit Damansara, 50490, Kuala Lumpur, Malaysia
Aurecon Engineering Consultants Limited Liability Company *	Company Number: 57969 Address: Unit 204-C, 2nd Floor, Jaidah Square, 63 Airport Road, Umm Ghuwailina, Doha
Aurecon AMEI – Dubai Branch *	Address: 8 th Floor, Elite Business Centre, Al Barsha 1, Dubai, United Arab Emirates
Aurecon Australia – Abu Dhabi Branch *	Address: Office 201, Level 2 Centro Capital Centre – Officer Tower, ADNEC Area, Al Khaleej Al Arabi Street, Abu Dhabi, United Arab Emirates

* On 20 November 2020, Aurecon divested its Middle East entities in Abu Dhabi, Dubai and Qatar.

South African Entities**

Aurecon 25 (Pty) Ltd	Address: Riverwalk Office Park, 41 Matroosberg Road Ashlea Gardens, Extension 6 Pretoria 0801
Aurecon 25 Trust (Trustees)	Address: Riverwalk Office Park, 41 Matroosberg Road Ashlea Gardens, Extension 6 Pretoria 0801
Aurecon Africa (Pty) Ltd	Address: Riverwalk Office Park, 41 Matroosberg Road Ashlea Gardens, Extension 6 Pretoria 0801
Aurecon South Africa (Pty) Ltd	Address: Riverwalk Office Park, 41 Matroosberg Road Ashlea Gardens, Extension 6 Pretoria 0801
Aurecon Investments South Africa (Pty) Ltd	Address: Riverwalk Office Park, 41 Matroosberg Road Ashlea Gardens, Extension 6 Pretoria 0801
Triple Advanced Investments 6 (Pty) Ltd	Address: Riverwalk Office Park, 41 Matroosberg Road Ashlea Gardens, Extension 6 Pretoria 0801
Africon Finance (Pty) Ltd	Address: Riverwalk Office Park, 41 Matroosberg Road Ashlea Gardens, Extension 6 Pretoria 0801
Aurecon Engineering International (Pty) Ltd	Address: Riverwalk Office Park, 41 Matroosberg Road Ashlea Gardens, Extension 6 Pretoria 0801
Aurecon Infrastructure Projects (Pty) Ltd	Address: Riverwalk Office Park, 41 Matroosberg Road Ashlea Gardens, Extension 6 Pretoria 0801
Aurecon Angola Limitada	Address: Edificio Aurecon, Rua 55 Urbanizacao, Nova Vida Luanda
ce Africon Angola Consultoria, Estudos e Projectos, Lda	Address: Edificio Aurecon, Rua 55 Urbanizacao, Nova Vida Luanda
Aurecon Botswana (Pty) Ltd	Address: Plot 127, Unit 16, Kgale Court Gaborone
Aurecon Ghana Limited	Address: Capital Place, Block B, Ground Floor Right 11 Patrice Lumumba Road Airport Residential Area, Accra

Aurecon Kenya Limited	Address: 2nd Floor, Acorn House 97 James Gichuru Road Lavington Nairobi
Aurecon Lesotho (Pty) Ltd	Address: 2nd Floor, Christie House Orpen Road, Maseru
Aurecon AMEI Limited	Address: Riverwalk Office Park, 41 Matroosberg Road Ashlea Gardens, Extension 6 Pretoria 0801
Aurecon Mozambique Limitada	Address: Regus, Millennium Park Building 1st Floor, Avenida Vladimir Lenine 174 Maputo
Aurecon Namibia (Pty) Ltd	Address: Unit 1, Mandela Offices Cnr Nelson Mandela Ave & Simon Bolivar Street, Klein, Windhoek
Aurecon Consulting Engineers Nigeria Limited	Address: Admiralty Street, Waterside, Off Admiralty Way Lekki Phase 1, Lagos State
Aurecon Rwanda Limited	Address: Land Trade House, 1st Floor Office No. 106 Gisimenti – Remera Kigali
Aurecon Uganda Limited	Address: 2nd Floor, Innovations House, Plot 78 Acacia Avenue Kampala

** On 31 December 2019, Aurecon demerged from South Africa.

Appendix B

Mandatory reporting requirement

No	Reporting Criteria (Modern Slavery Act 2018, section 16)	Location
1.	Section 16(a) – identify the reporting entity	Page 3
2.	Section 16(b) - describe the structure, operations and supply chains of the reporting entity	Page 4 - 6
3.	Section 16(c) - describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Pages 5 - 8
4.	Section 16(d) - describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Page 7-9
5.	Section 16(e) - describe how the reporting entity assesses the effectiveness of such actions	Page 10
6.	Section 16(f)(i) - describe the process of consultation with: any entities that the reporting entity owns or controls	Page 11
7.	Section 16(f)(ii) - describe the process of consultation with: in the case of a reporting entity covered by a statement under Section 14 - the entity giving the statement	Not Applicable
8.	Section 16 (g) - Include any other information that the reporting entity (or the entity giving the statement) considers relevant.	Page 12

About Aurecon

Aurecon brings ideas to life to design a better future. Imagining what is possible, we turn problems into solutions.

Aurecon offices are located in:

Australia, China, Hong Kong, Indonesia, Macau, New Zealand, Philippines, Qatar, Singapore, Thailand, United Arab Emirates, Vietnam.

For more information please visit
www.aurecongroup.com

The Aurecon group of companies is made up of a number of separate legal entities operating across diverse jurisdictions. Not all those entities provide services to clients.

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