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# MODERN SLAVERY STATEMENT THE APP GROUP 2021



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### 1. GENERAL

This Modern Slavery Statement for the calendar year 2021 reporting period is presented in accordance with the Modern Slavery Act 2018 and published jointly on behalf The APP Group operating under the ultimate parent company Apex TopCo Pty Ltd (ACN 647 943 173) and its wholly owned subsidiaries:

- Apex HoldCo Pty Ltd (ACN 647 945 104),
- Apex MidCo Pty Ltd (ACN 647 947 377),
- Apex BidCo Pty Ltd (ACN 647 948 605),
- APP Corporation Pty Limited (ACN 003 764 770),
- Appoint Consulting Pty Ltd (ACN 003 999 031),
- Australian Quality Assurance & Superintendence Pty Ltd (ACN 050 539 010),
- CI Australia Pty Ltd (ACN 003 053 183), and
- Infrastructure Nation Pty Ltd (ACN 612 655 642).

References to “The APP Group”, “we”, “us”, or “our” are to these entities individual and collectively.

### 2. OUR STRUCTURE

The APP Group was founded in 1989 and has today grown into a leading national property and infrastructure consultancy with approximately 450 staff across nine offices and five brands.

The operating group is led by APP Corporation Pty Ltd. We support clients across all phases of the asset capital investment lifecycle – Strategy, Definition, Delivery and Transition. Our consultancy and advisory services cover Project Management, Property Advisory, Asset and Portfolio Solutions Advisory, Infrastructure Advisory, Risk Management and Auditing and Transactions and Real Estate. We have access to a broad national network of expertise across the property and infrastructure industry, and are supported by our wholly owned subsidiaries:

- **Appoint Consulting:** A passionate and collaborative team providing human resources and talent attraction advisory with a focus on placing the right candidate within the right role.
- **AQUAS:** A dedicated team of professionals supporting businesses to deliver solutions across compliance, governance, and risk management business operations.
- **CI Australia:** CI sell, lease and manage a wide range of commercial real estate assets, for government, institutional and private clients.

- **Infrastructure Nation:** Deploying international expertise, proven plans, commercial understanding and a wealth of knowledge to deliver results across large scale complex infrastructure projects.

### 3. OUR OPERATIONS AND SUPPLY CHAINS

In the reporting period, The APP Group operated primarily in Australia and New Zealand, a region which is recognised in the Modern Slavery Index to have a low risk. Furthermore, the inherent nature of our professional services means that the risk in our operations is also low. Our supply chains consist of >95% local suppliers, providing low risk services such as:

- professional services including management and technical disciplines, and legal;
- leasing of commercial office space including related utilities and services such as cleaning;
- business services including marketing, insurance, training, recruitment and audit; or
- business travel services including travel agency, air flights, car hire and accommodation.

Less than 5% of our supply chain involves suppliers in other regions and primarily involves information technology hardware or software subscriptions with leading global providers.

While the risk of modern slavery in our supply chain is low, risks can increase where services are provided by low skilled workers, such as cleaners, or where they are delivered in an offshore jurisdiction with higher underlying risk. We focus our risk mitigations in such areas where they arise.

### 4. OUR PURPOSE AND VALUES

Our Purpose and Values create a cultural foundation which naturally supports the eradication of modern slavery.

Our purpose is



Our values are:

<p><b>Own It</b></p> <ul style="list-style-type: none"> <li>Take personal responsibility</li> <li>Own what you do</li> <li>Constructively confront and solve problems</li> <li>Advise clients as if it were your business</li> <li>Challenge the status quo</li> <li>Have a can do attitude</li> </ul> <p>Your call</p>	<p><b>Strive</b></p> <ul style="list-style-type: none"> <li>Take on big challenges and see them through</li> <li>Passion for success and to excel</li> <li>Create and explore opportunities</li> <li>Think innovatively</li> <li>Deliver results every time</li> </ul> <p>Lead the way</p>	<p><b>Do What's Right</b></p> <ul style="list-style-type: none"> <li>Be open honest and fair</li> <li>Follow through on commitments</li> <li>Commitment to the community and environment</li> <li>Integrity in everything we do</li> </ul> <p>Hand on heart</p>	<p><b>Respect</b></p> <ul style="list-style-type: none"> <li>Listen to different points of view</li> <li>Acknowledge and respect each individual</li> <li>Trust</li> <li>Be inclusive and supportive</li> <li>Teamwork</li> <li>Co-operate</li> <li>Share knowledge and ideas</li> </ul> <p>Enjoy the journey</p>
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## 5. POLICIES AND PROCEDURES

We do not tolerate any form of modern slavery and are committed to maintaining and improving systems and processes to prevent modern slavery within our business and supply chains. We are committed to operating in accordance with all applicable laws including the Modern Slavery Act 2018 as well as the Universal Declaration of Human Rights.

This approach is embedded in the following key policies and their related procedures which apply to all employees, subcontractors, business partners and wholly and majority-owned business ventures.

### **Code of Business Conduct**

This Code sets out our expectations of conduct and behaviour to ensure we work safely, behave ethically, and abide by laws and regulations with all work decisions, tasks and interactions, everywhere, every day. It includes our commitment to eradication of modern slavery.

### **Modern Slavery Policy**

This policy outlines our commitment to the eradication of modern slavery and our reporting and other legal obligations under the Modern Slavery Act 2018. The policy is aligned with this Statement. It further details our commitment to managing all aspects of our operations and supply chains in pursuit of the eradication of all forms of modern slavery including slavery, servitude, forced marriage, forced labour, deceptive recruiting, trafficking in persons and debt bondage.

### **Procurement Policy**

This policy outlines our approach to the procurement of goods and services for our business operations. A key principle of this policy is that all procurement activities must be conducted in an ethical, safe and sustainable manner. This policy requires suppliers to support human rights throughout their supply chain in order to ensure legal and ethically sourced goods and services have been procured. In accordance with this policy, we commit to assess the risk of modern slavery in all procurement and where a risk is identified, engage with the supplier to confirm that they take reasonable steps to identify, assess and address such risks.

### **Human Rights Statement**

This statement sets out our commitment to respecting and upholding human rights within our operations and sphere of influence. We take reasonable steps to identify, prevent and mitigate any adverse human rights impacts and integrate human rights commitments into our business practices.

### **Environmental and Sustainability Policy**

This policy sets out our commitment to environmentally and socially responsible operations. This includes working proactively with our suppliers to procure and promote the most appropriate and sustainable solutions, and to comply with all relevant laws.

### **Whistleblower Policy**

This policy supports the compliance with these policies by encouraging reporting of potential breaches, ensuring reporting mechanisms are accessible, and commits to the protection of any employee who report genuinely held concerns regarding our business or its operations.

## 6. PROCUREMENT AND SUPPLIER DUE DILIGENCE

We recognise that modern slavery risks, while low, exist within our supply chains. In alignment with our Code of Business Conduct and related policies, we undertake a range of due diligence activities of our operations and supply chains.

We assess categories of suppliers of goods and services for the potential of modern slavery in their operations or supply chains. We have a comprehensive modern slavery questionnaire, that is shared with suppliers who are assessed as having higher potential for modern slavery risk. We also engage with suppliers and workers to validate completed questionnaires and issues of concerns. We review completed questionnaires and engage with the supplier to confirm they take reasonable steps to identify, assess and address risks of modern slavery practices in their operations and supply chains.

We require suppliers to support our commitments outlined in this Statement through contractual obligations including:

- abiding by all applicable laws and regulations including international human rights and labour conventions, employment laws and the Modern Slavery Act 2018;
- complying with our Code of Business Conduct and its related policies;
- allowing us to verify compliance and to act if a non-compliance or risk is identified; and
- allowing termination of the contract if the supplier ultimately fails to resolve identified risks.

## 7. ASSESSMENT OF EFFECTIVENESS

Our internal audit programme assesses the application and effectiveness of these policies and processes. Our systems are also externally audited annually and are third party accredited.

There were no instances of modern slavery identified in our operations or supply chain during the reporting period.


## 8. TRAINING OF STAFF

Modern slavery is included in our Code of Business Conduct induction training delivered to all new staff and also in annual refresher training delivered to all staff.

Our training program for Directors, Officers and key participants in the procurement of goods and services includes completion of the Australian Border Force e-learning modules on Modern Slavery in Public Procurement, Identifying and Assessing Modern Slavery, and Managing Modern Slavery Risks.

## 9. CONSULTATION AND APPROVAL

This statement was prepared in consultation with each entity covered by this report and was endorsed by the Board of Apex TopCo Pty Ltd on as the ultimate parent entity of the group on 30 June 2022.

SIGNATURE: 

Signed 30 June 2022 by **Adam Castro** as a Director of Apex TopCo Pty Ltd.