



# RESPECTING HUMAN RIGHTS

## 2023 JOINT MODERN SLAVERY STATEMENT

Reporting period: 1 January 2023 – 31 December 2023

CIMIC Group respects human rights and acknowledges the history and contributions of all local communities, including Traditional Owners and First Nation peoples. Across our locations, we recognise and value our responsibility to live and work on country, and with communities, respectfully and with care.

The UN Guiding Principles on Business and Human Rights, the UN Global Compact, the UN Sustainable Development Goals, and the International Labour Organisation's standards are examples of key international principles and standards that inform our approach to evolving our business in managing the risk of modern slavery in our operations and supply chain and improving environmental, social and governance outcomes.





# CONTENTS

<b>STATEMENT DEVELOPMENT AND APPROVAL SUMMARY</b>	<b>2</b>
<b>A SAFE AND FAIR WORK ENVIRONMENT SUPPORTING SUSTAINABLE DEVELOPMENT</b>	<b>3</b>
<b>1. ASSET, INFRASTRUCTURE AND RESOURCES LEADER</b>	<b>4</b>
<b>2. OUR OPERATIONS AND SUPPLY CHAIN</b>	<b>5</b>
KEY OPERATIONS	6
SUPPLY CHAIN	7
<b>3. UNDERSTANDING OUR MODERN SLAVERY RISKS</b>	<b>8</b>
OPERATIONS RISK	8
SUPPLY CHAIN RISK	8
<b>4. ASSESSING AND ADDRESSING THE RISKS OF MODERN SLAVERY</b>	<b>10</b>
OUR INTEGRATED APPROACH	10
Governance and leadership	12
Compliance	12
Grievance and reporting mechanism	15
Procurement	16
People and employment	19
Human Rights Impact Assessments (HRIA)	20
Education and training	23
<b>5. 2023 ACTIONS</b>	<b>24</b>
OPERATIONS	24
SUPPLY CHAIN	25
ASSESSING EFFECTIVENESS	25
<b>6. LOOKING AHEAD</b>	<b>26</b>
<b>APPENDIX - APPROVAL AND MANDATORY CRITERIA</b>	<b>28</b>

Our 2023 Modern Slavery Statement can be read in conjunction with our reporting suite and key resources which are available at [cimic.com.au](http://cimic.com.au).



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# STATEMENT DEVELOPMENT AND APPROVAL SUMMARY

This is CIMIC Group's fourth modern slavery statement and our second as a fully owned subsidiary of HOCHTIEF Australia Holdings Limited ABN 17 103 181 675 (**HOCHTIEF Australia**).<sup>1</sup> CIMIC Group Limited ABN 57 004 482 982 (**CIMIC**) was removed from the Official List of the Australian Securities Exchange at the close of trading on 11 May 2022 under Listing Rule 17.14, following compulsory acquisition of its remaining securities by HOCHTIEF Australia.

HOCHTIEF Australia is fully owned by HOCHTIEF Aktiengesellschaft (**HOCHTIEF AG**), which is listed on the Deutsche Borse. The largest shareholder in HOCHTIEF AG is Spanish based company Actividades de Construccion y Servicios, SA (**ACS**), which holds 75.93% of the shares in HOCHTIEF AG as at December 2023. The ACS Group is a leading engineering, construction and infrastructure management group.

As an Australian-based group, CIMIC has retained its local corporate and operational management, as well as Independent Directors, and we remain a substantial, locally managed, stand-alone company.

CIMIC Group's<sup>2</sup> Modern Slavery Statement for the period 1 January 2023 to 31 December 2023 has been prepared as a joint statement pursuant to sections 14 and 16 of the Modern Slavery Act 2018 (Cth) and covers the following reporting entities and each of their owned and controlled entities:

HOCHTIEF Australia Holdings Limited	ABN 17 103 181 675
CIMIC Group Limited	ABN 57 004 482 982
CPB Contractors Pty Ltd	ABN 98 000 893 667
Broad Group Holdings Pty Ltd	ABN 50 052 046 518
Broad Construction Pty Ltd	ABN 38 089 532 061
UGL Pty Limited	ABN 85 009 180 287
UGL Rail Services Pty Ltd	ABN 58 000 003 136
UGL Unipart Rail Services Pty Ltd	ABN 49 154 895 940
UGL Regional Linx Pty Ltd	ABN 97 646 771 011
UGL Operations and Maintenance (Services) Pty Ltd	ABN 76 010 045 299
UGL Operations and Maintenance Pty Ltd	ABN 17 114 888 201
UGL Engineering Pty Limited	ABN 96 096 365 972
Sedgman Pty Ltd	ABN 86 088 471 667
CIMIC Group Investments No.2 Pty Ltd	ABN 63 610 264 189
CIMIC Group Investments Pty Ltd	ABN 74 126 876 953
LH Holdings No. 2 Pty Ltd	ABN 15 659 748 133

Preparation of this Modern Slavery Statement has been managed by a CIMIC working group integrating team members from the People, Procurement, Risk, Legal, Compliance, Sustainability and Communications functions, in consultation and collaboration with HOCHTIEF Australia and our Operating Companies CPB Contractors (including Broad Construction), Leighton Asia, UGL and Sedgman, as well as Pacific Partnerships, EIC Activities, Devine and Leighton Properties.

Our Operating Companies have reviewed and verified the data contributed for this Statement and implemented the year's modern slavery management and prevention activities as applicable to their business.

This Statement has been reviewed and approved by the principal governing body of the 'higher entity' as defined by the Modern Slavery Act 2018 (Cth), being the Board of HOCHTIEF Australia. Supporting this approval, this Statement has also been reviewed and approved by the Board of CIMIC Group Limited, the Executive Chairman and Chief Executive Officer of CIMIC Group Limited, and the Managing Directors of each of our businesses listed above.

<sup>1</sup> HOCHTIEF Australia is the holding company of CIMIC Group on behalf of HOCHTIEF AG.

<sup>2</sup> In this report a reference to 'CIMIC Group', 'the Group', 'we', 'us' or 'our' is a reference to CIMIC Group Limited ABN 57 004 482 982 and the entities that it owns and controls unless otherwise stated. During the reporting period, CIMIC had a 50% equity joint interest in Thiess. Thiess publishes a separate statement. Further, CIMIC held an investment in Ventia, one of the largest infrastructure services providers in Australasia. CIMIC divested this investment in four block trades with the final trade crossing on 3 November 2023. Ventia publish their own separate statement. The Group also has investments and interests in a number of other associated companies, joint ventures and other non-controlled operations which are not included for the purposes of this Statement.

## A SAFE AND FAIR WORK ENVIRONMENT SUPPORTING SUSTAINABLE DEVELOPMENT

CIMIC Group's governance approach is based on respecting all people and operating sustainably and ethically. It underpins our actions to create a safe, fair, respectful, and inclusive work environment for our employees and suppliers and to generate value for our clients and communities.

Our team of around 30,000 people work in around 20 developed and developing countries. We focus on solutions that can transform communities, including renewable energy, digital infrastructure, new mobility solutions, essential resources, and sustainable infrastructure. We use our capabilities to contribute to a climate-resilient future and to create an enduring social and economic legacy.

We absolutely reject all forms of modern slavery and continue to analyse the risk and review our governance activities to strengthen our understanding of and response to the issue.

In this Statement we describe how we embed a disciplined approach, across our Operating Companies, to identify, mitigate and prevent the risk of modern slavery in our operations and supply chain.

Our Code of Conduct, governance framework, control systems, and our Human Rights Impact Assessment program support consistent due diligence and compliance across our employment and procurement practices.

In 2023, 93.7% of our people were employed locally. We share how we work by developing local leaders, teams, and graduates. We are building skills, embedding our governance framework, and ensuring our workforce reflects the regions and countries in which we operate.

Our Code of Conduct and other compliance training activities further support team members to identify and report modern slavery and other risks and maintain ethical business practices.

Our procurement framework is key to building and maintaining a reliable and trusted supply chain, and proactively identifying and managing risks throughout the term of each contract. The framework assesses subcontractors, suppliers and third parties engaged by our businesses, and is supported by our e-procurement system. Of the 19,211 suppliers we worked with during 2023, 97% were local to our projects and all were assessed for human rights and other risks.

Respecting our people and those we work alongside, in our supply chain and the communities in which we operate is a cornerstone of how we work. Our steps to protect human rights enhance the benefits our projects and operations deliver and are vital to us building and sharing a better future.



A handwritten signature in black ink, appearing to read 'Juan Santamaria'.

**Juan Santamaria**

Executive Chairman of CIMIC Group  
Chief Executive Officer of HOCHTIEF  
Chief Executive Officer of ACS Group



Brisbane International Terminal Security and Retail Upgrade, Queensland, CPB CONTRACTORS

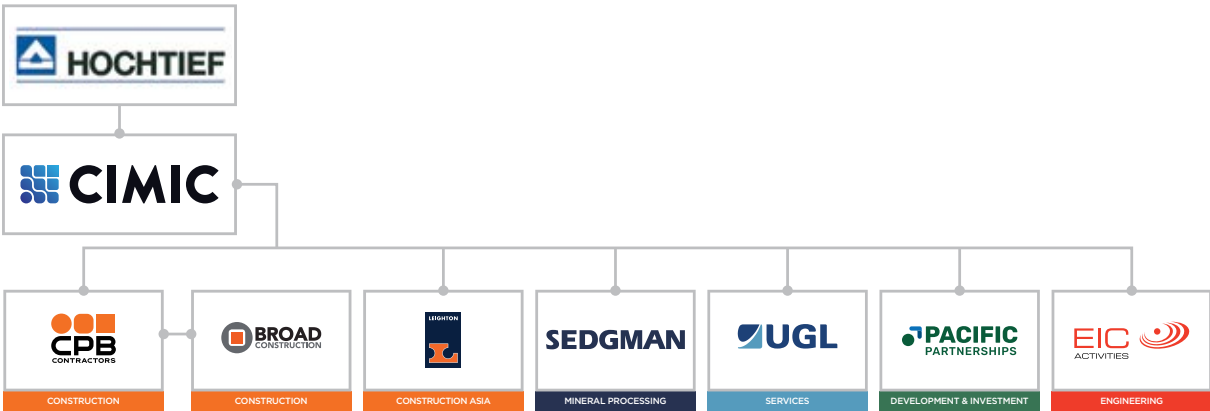
# 1. ASSET, INFRASTRUCTURE AND RESOURCES LEADER

CIMIC Group is an engineering-led construction, mining, industrial services, development and investment leader working across the lifecycle of assets, infrastructure and resources projects.

HOCHTIEF Australia, CIMIC and the head company of each of our Operating Companies being CPB Contractors Pty Ltd, Broad Construction Pty Ltd, UGL Pty Ltd, Sedgman Pty Ltd, Pacific Partnerships Pty Ltd, Devine Pty Ltd, Leighton Properties Pty Ltd and EIC Activities Pty Ltd are all incorporated in Australia, apart from Leighton Asia Limited which is incorporated in Hong Kong.

Our mission is to generate sustainable returns by delivering innovative and competitive solutions for our clients while providing safe, and fulfilling careers for our people.

With a history since 1899, and around 30,000 people in around 20 countries, CIMIC Group is working across developed and developing economies and we strive to be known for our principles of Integrity, Accountability, Innovation and Delivery, underpinned by Safety.



CIMIC Group simplified structure of key operations



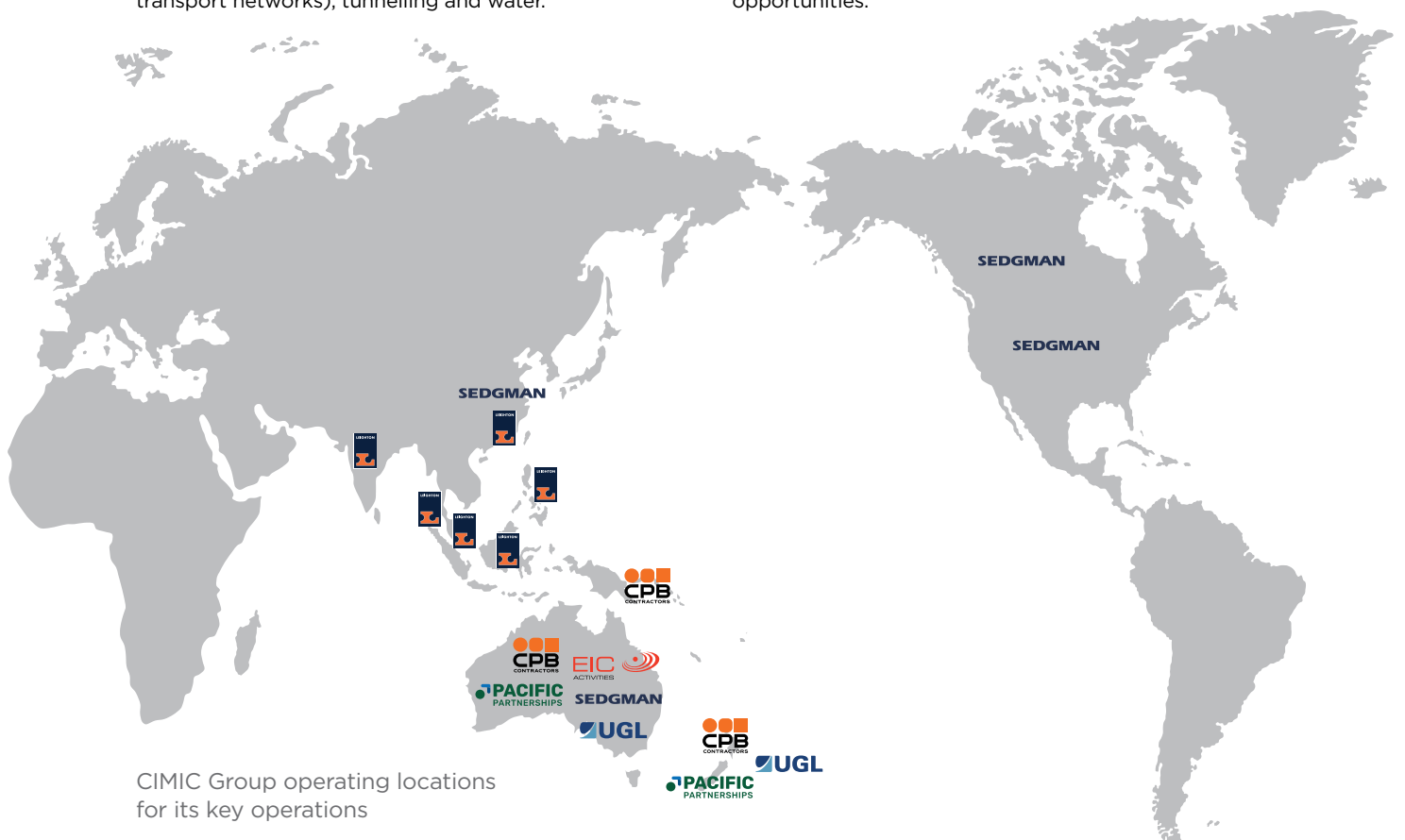
## 2. OUR OPERATIONS AND SUPPLY CHAIN

Bringing our Operating Companies' diverse capabilities together to offer integrated solutions differentiates our Group.

Our collective experience spans sectors such as aviation, building, defence, digital infrastructure (including data centres and software), resources, ports, power and renewable energy (renewables commodities, generation, firming, storage and transmission), social infrastructure (education and health), sustainable mobility (light rail, metros, transport networks), tunnelling and water.

Within these, our capabilities deliver the full spectrum of services, from feasibility, design, planning and investment; to manufacturing and construction; to operations, maintenance, upgrades and asset management; to rehabilitation and decommissioning.

CIMIC Group's financial strength, integrated capabilities and advanced digitisation support our delivery of a broad range of major projects in our markets, and our ability to take equity positions in public private partnerships and other investment and development opportunities.



CIMIC Group operating locations for its key operations

## KEY OPERATIONS



### CPB Contractors

CPB Contractors is the Australasian construction company of the CIMIC Group, delivering complex infrastructure projects across all sectors of the construction industry for more than 90 years. Supported by industry-leading delivery systems that we combine with best-practice construction methodology and digital engineering expertise, our experienced project teams are trusted to deliver roads, rail, tunnelling, defence, building, health, renewables and energy resources infrastructure.



### Broad Construction

Broad Construction is a trusted managing contractor within the Australian building industry, delivering new build, fit-out and refurbishment projects. More than 30 years of consistent delivery by Broad Construction has prompted sustainable growth and diversification, with our projects spanning capital cities and major regional areas.



### Leighton Asia

Leighton Asia is the contractor behind some of Asia's most prestigious projects, delivering a portfolio of high-profile infrastructure projects throughout Asia. Established in 1975, headquartered in Hong Kong, Leighton Asia is a proven leader in the delivery of complex tunnel, rail and road networks, and a comprehensive range of services spanning key sectors including civil engineering, technology and digital engineering, MEP and building.



### Sedgman

Sedgman is a leading provider of integrated minerals processing solutions. Our 250-strong portfolio of high-performing processing plants and supporting mine-site infrastructure showcases the value of our specialist focus. Since 1980, Sedgman has advanced the standard of excellence and innovation for clients across diverse commodities including iron ore, precious and base metals, and industrial minerals.



### UGL

UGL is a specialist end-to-end engineering, services and operations provider, with a rich history dating back to 1899 and now a market leader in many of the sectors in which it operates. Working with some of the most important companies and governments in Australia and globally, UGL helps to play a role in people's lives every day. UGL keeps Australia moving through its transport manufacturing, maintenance and operations offering, and supports the energy sector through its renewables, power generation, resources and transmission operations.



### Pacific Partnerships

Pacific Partnerships is a leading infrastructure developer. We drive innovative collaboration across CIMIC Group's collective expertise to create, fund, own, deliver and operate sustainable solutions that unlock benefits for our communities and for the future. In a world rich with challenges and opportunities, we develop and deliver bold solutions that underpin prosperity, productivity and liveability of our cities and their people.



### EIC Activities

EIC Activities is CIMIC Group's engineering and technical services business. Our engineering, design and risk mitigation expertise provides CIMIC Group with a competitive advantage for winning and delivering profitable projects that also generate value for clients. We ensure that the Group's collective experience, technical capabilities, innovations and leading-edge technology applications are leveraged to deliver our clients' objectives.



## SUPPLY CHAIN

In 2023, CIMIC Group has worked with 19,211 direct domestic and international suppliers with key areas of spend including:

- materials such as concrete, steel, piping and asphalt
- industrial/engineering consumables such as fuel, lubricants, abrasives, adhesives and sealants
- rail componentry and rolling stock
- major plant and equipment such as tunnel boring machines, and mineral processing equipment
- personal protective equipment (PPE)
- subcontractors such as electricians, plumbers, glaziers, steel fixers and other tradespeople
- labour hire
- insurance
- professional services
- technology and telecommunications.

We typically source products and services from suppliers or subcontractors. The products and services we procure are those used in development, design, financing, construction, operations and maintenance, and management of projects and the related corporate functions.

We generally do not manufacture our own products except where CPB Contractors produces precast concrete components for construction projects or where UGL manufactures, upgrades and maintains rolling stock and some rail specific componentry in Australia. Parts may be sourced locally or imported.

Our procurement of services includes activities that relate to corporate support such as facilities and maintenance, accounting, legal and IT services, and professional consulting services such as design and engineering, all of which complement our own internal resources for either short or long-term engagements as required.



### 3. UNDERSTANDING OUR MODERN SLAVERY RISKS

We recognise that in delivering assets, infrastructure and resources projects, both in Australia and internationally, we operate in some markets with supply chains that may have a potential exposure to modern slavery risks, and this demands a high degree of vigilance in meeting our obligations.

Our understanding of the drivers, vulnerable groups and the hidden but pervasive presence of modern slavery, and our approach to addressing it, has been informed by the UN Guiding Principles on Business and Human Rights, the UN Global Compact, the UN Sustainable Development Goals and the International Labour Organisation's standards. Our insight has also been facilitated by the Global Slavery Index (GSI) published by Walk Free, our ongoing program of Human Rights Impact Assessments (HRIA), which commenced in 2017, use of our third-party screening tool and on-going operations and supply chain risk assessments.

Modern slavery risks can be present in the construction, mining, minerals processing, heavy manufacturing and maintenance sectors in which we operate. These risks may present as exploitative practices such as debt bondage, child labour, forced labour and human trafficking, as detailed below, and may be heightened in some of the jurisdictions in which we operate.

Given the diversity and breadth of CIMIC Group's geographies and markets, we monitor for a wide range of risks that have the potential to materially impact our operations, people, and reputation, the environment and communities in which we work, and the financial prospects of the Group.

#### OPERATIONS RISK

Complementing CIMIC Group's governance and due diligence processes, we continue to use HRIAs to extend our identification and understanding of human rights and modern slavery risks in our operations. More detail about our HRIA program is set out in section 4.

In 2023, we continued the review of human rights risks in our operations by performing country-by-country analysis in key human rights risk areas, leveraging our Human Rights Country Analysis which was conducted in 2021.

#### SUPPLY CHAIN RISK

The Group procures goods and services from Australia and internationally.

Certain goods and low skilled services have a higher risk of modern slavery. These can include the production of garments, apparel, and PPE; the supply of raw materials, electronic products and steel fabrication; solar panel suppliers and the provision of certain services including labour hire, cleaning, freight and logistics.

We remain committed to refraining from purchasing 'at risk' goods and services and inadvertently contributing to modern slavery. We do this in part through our due diligence processes which include supplier screening and using, wherever possible, a suite of template commercial contracts which include indirect supplier controls. These are detailed in section 4.



Asset Services, Victoria, UGL



## HUMAN RIGHTS COUNTRY ANALYSIS

### ***Independent criteria-based review of countries where we operate***

The human rights country analysis, established in collaboration with HOCHTIEF AG in 2021 and refreshed in 2023, was led by an independent agency.

The analysis assessed the level to which key human rights are protected, promoted, and respected, in each country where CIMIC operates, specifically analysing:

- Protection – human rights protection offered by government and institutions
- Promotion – legal human rights due diligence requirements applicable to companies, the legislation in force and the voluntary framework on business and human rights
- Respect – the most vulnerable human rights issues.

Each country was assessed against 12 criteria, under the following frameworks, conventions, and indexes:

- United Nations Human Rights Framework
  - > Ratification of United Nations Treaties
  - > Presence in United Nations Committees
  - > Reporting to the United Nations Committees
- International Labour Organisation
  - > Ratification of ILO Fundamental Conventions
- Regional Human Rights Framework
  - > Regional Systems of Human Rights
- National Human Rights Indexes
  - > Fragile States Index
  - > Corruption Perception Index
  - > Modern Slavery Index
  - > Death Penalty Index
  - > Average Working Hours (ILO)
  - > Global Gender Gap Ranking 2020
  - > Global Rights Index 2021.

In 2023, we continued to review and assess our human rights risk profile with a country risk analysis in our countries of operation, leveraging the 2021 risk analysis.

Our ongoing risk analysis has provided deeper insight into the human rights landscape associated with each country's political, social, and economic context; legal requirements for businesses' human rights due diligence; and main human rights risk factors. This information supports our relevant managing functions in developing and monitoring appropriate controls to prevent, mitigate or respond to each risk.

## 4. ASSESSING AND ADDRESSING THE RISKS OF MODERN SLAVERY

### OUR INTEGRATED APPROACH

To assess and address modern slavery risks CIMIC Group leverages its governance, compliance, procurement and people frameworks, to ensure we apply a consistent and disciplined approach across our Operating Companies.

These mature and integrated frameworks provide a range of cohesive levers for consulting and aligning our businesses, managing risk, assessing performance and engaging our people and suppliers – including an open, confidential and responsive grievance and reporting mechanism.

Our approach, due diligence and assurance are facilitated by collaboration between specialist functions in the parent company, CIMIC, and our Operating Companies including People, Procurement, Risk, Legal, Compliance, Internal Audit, Sustainability and Communications.

To enhance our ability to identify, mitigate, and prevent the risk of modern slavery, and respond to any impacts should they occur, we work through a cycle of action,

investigation, evaluation and critical analysis, and remediation.

From this we use evidence-based assessments of our practices and new initiatives to inform our planning and continual improvement steps.





### Integration processes

During the reporting period, Sedgman acquired Novopro, an engineering and metallurgy company based in Canada (July 2023), and UGL acquired the telecommunications services arm of Skybridge, an Australian installation and maintenance contracting company (September 2023).

Integration processes commenced upon acquisition and continued throughout the year. These processes align policies and procedures, including in the area of modern slavery, embedding our integrated governance, compliance, procurement and people frameworks.



Infrastructure development and investment, Australia and New Zealand, PACIFIC PARTNERSHIPS

	GROUP ALIGNMENT	RISK AND PERFORMANCE MANAGEMENT	ENGAGEMENT, MONITORING AND CONTINUOUS IMPROVEMENT
 <b>GOVERNANCE</b>	<ul style="list-style-type: none"> <li>Principles</li> <li>Code of Conduct</li> <li>Board and Committees</li> <li>Group Policies and Procedures</li> </ul>	<ul style="list-style-type: none"> <li>Risk management framework</li> <li>Management systems</li> <li>Board Charter</li> <li>Board Ethics, Compliance and Sustainability Committee Charter</li> <li>Group Governance System</li> </ul>	<ul style="list-style-type: none"> <li>Business Conduct Representative</li> <li>Reportable Conduct Group</li> <li>Board Ethics, Compliance and Sustainability Committee</li> <li>Ongoing liaison with Government, industry and regulators</li> </ul>
 <b>COMPLIANCE</b>	<ul style="list-style-type: none"> <li>Policies relevant to modern slavery issues, such as: <ul style="list-style-type: none"> <li>Code of Conduct</li> <li>Modern Slavery Policy</li> <li>Modern Slavery Protocol</li> <li>Approval to Operate Internationally Policy</li> <li>Risk Management Policy</li> <li>Third Parties Policy</li> <li>Procurement Policy</li> <li>Sustainability Policy</li> <li>Health and Safety Policy</li> <li>Whistleblower Policy</li> <li>Anti-Bribery and Corruption Policy</li> <li>Gift and Hospitality Policy</li> <li>Compliance Policy</li> </ul> </li> <li>Compliance Working Group</li> <li>Modern Slavery Committees – CIMIC and cross-OpCo</li> </ul>	<ul style="list-style-type: none"> <li>Annual / ad hoc compliance assurance audit</li> <li>Internal audit activities</li> <li>Board Ethics, Compliance and Sustainability Committee reporting and review</li> </ul>	<ul style="list-style-type: none"> <li>Grievance and reporting mechanism <ul style="list-style-type: none"> <li>Complaints and Investigation Procedure</li> <li>Business Conduct Representatives and Reportable Conduct Groups at CIMIC and Operating Company levels</li> <li>Independent Ethics Line</li> </ul> </li> </ul>
 <b>PROCUREMENT</b>	<ul style="list-style-type: none"> <li>Third Parties Policy</li> <li>Procurement Policy</li> <li>Delegations of Authority</li> </ul>	<ul style="list-style-type: none"> <li>Supply chain identification and management of risks relating to modern slavery by processes such as: <ul style="list-style-type: none"> <li>Supplier registration</li> <li>Supplier screening tool and onboarding</li> <li>Third Party Anti-Bribery, Corruption and Business Integrity Declaration Form</li> <li>Supplier pre-qualification questionnaires</li> <li>Template commercial contracts</li> <li>Procurement policy internal audits</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Supplier access to grievance and reporting mechanism, including the independent Ethics Line</li> </ul>
 <b>PEOPLE</b>	<ul style="list-style-type: none"> <li>People policies including <ul style="list-style-type: none"> <li>Recruitment Policy, procedures and management systems</li> <li>Workplace Behaviour Policy</li> <li>Diversity and Social Inclusion Policy</li> <li>Flexible Working Policy</li> <li>Parental Leave Policy</li> <li>Family and Domestic Violence Policy</li> <li>Redundancy Policy</li> <li>Complaints and Investigation Procedure</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Human Rights Impact Assessments</li> <li>People policies internal audit</li> </ul>	<ul style="list-style-type: none"> <li>Education and training <ul style="list-style-type: none"> <li>Leadership and culture</li> <li>Code of Conduct training</li> <li>Compliance training</li> <li>Modern slavery training</li> <li>Equal employment opportunity, anti-bullying, harassment and discrimination training</li> </ul> </li> <li>Reporting and grievance framework</li> <li>Complaints investigation procedures</li> </ul>

Key elements of CIMIC Group's integrated approach to assessing and addressing modern slavery risks.

## Governance and leadership

Our governance framework is founded in our Principles of Integrity, Accountability, Innovation and Delivery, underpinned by Safety. These Principles guide all of the Group's activities and form the basis of our Code of Conduct which sets the standard of behaviour we expect from all our employees, sub-contractors and partners.

Where the Code of Conduct or a policy sets higher standards of behaviour than local laws, rules, customs or norms, the higher standards apply.

Our Code of Conduct rejects all forms of modern slavery including, but not limited to, the trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage and deceptive recruiting for labour and services. We do not tolerate unlawful child labour or any form of exploitation of children or young people and commit to complying with the International Labour Organisation (ILO) with respect to under-age workers.

Whilst ultimate accountability rests with the Board, our governance framework delegates the management thereof to the Board's Ethics, Compliance and Sustainability Committee (ECSC) and senior management, under the leadership of the Chief Executive Officer.

The ECSC assists the Board in fulfilling its corporate governance and oversight responsibilities, and compliance with all applicable legal and regulatory requirements and internal policies. The ECSC monitors and reviews compliance and performance in the areas of health and safety, diversity and social inclusion, human rights including modern slavery, the environment, sustainability, and business conduct.

We have a comprehensive series of policies, procedures, frameworks and guidelines relating to corporate governance, ethics, and financial and risk management in place across our operations to provide overall operating parameters for our entities.

Managing risk is a critical element of the Group's overall business strategy and has been a key contributor to our success. Our risk management framework<sup>3</sup> is tailored to our business, embedded largely within existing processes and aligned to our objectives, both short and longer term.

Our Risk Management Policy sets out the requirements to identify, analyse, evaluate, treat, monitor, review and report risks that have the potential to impact the Group, including our people, third parties, the general public, the communities in which we work and the environment. It also includes our operations, financial outcomes and reputation or other impacts that the Group is exposed to.

Our Approval to Operate Internationally Policy, tendering governance framework and associated tools, including country risk assessments, support our risk assessment processes (which includes consideration of modern slavery risks) in relation to our tendering activities.

Our Operating Companies leverage advanced management systems to drive repeatable excellence. Where relevant, we work on shared platforms, technology solutions and processes, underpinned by shared policies, to create efficiency and consistency.

## Compliance

Our compliance, due diligence and internal audit framework engages our businesses on their compliance obligations - including the requirements stated in our Code of Conduct and policies such as Modern Slavery Policy, Anti-Bribery and Corruption Policy, Third Parties Policy, Group Procurement Policy, Health and Safety Policy, Workplace Behaviour Policy and Whistleblower Policy.

Our Modern Slavery Policy, introduced in 2021, facilitates the Group's ongoing consultation on the identification of risks and consistent due diligence in assessing and addressing modern slavery risks. The Policy, and its supporting Protocol, set shared minimum requirements for the Group in relation to planning, control systems, reporting and engagement.

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<sup>3</sup> Our risk management processes are aligned to the requirements of the ISO 31000.



## CIMIC GROUP'S MODERN SLAVERY POLICY AND PROTOCOL

### ***Enhancing consultation and engagement across CIMIC Group***

CIMIC Group's Modern Slavery Policy and Protocol for assessing and addressing the risk of modern slavery in our operations and supply chain, operates alongside the CIMIC Code of Conduct.

The Policy and Protocol were developed in consultation with Operating Company representatives in 2021 to meet priorities for efficacy and flexibility.

The Policy and Protocol integrate with, and leverage, the Group's broader governance system, enable Operating Companies to focus on risks specific to their business, and facilitate ongoing consultation across the Group for compliance, continuous learning and improvement.

Our Modern Slavery Policy commits the Group to assessing and addressing the risks of modern slavery, sets out accountabilities, and describes the internal control systems and reporting process that are to apply.

Our Modern Slavery Protocol provides guidance for our businesses to assess and address the risks of modern slavery as applicable to their operations and activities. It outlines:

- the use of a third-party screening tool, to assist in screening their suppliers and third parties as part of the supply chain due diligence process
- the use of CIMIC Group template contracts for goods or services procured wherever possible, including standard clauses with respect to modern slavery
- the use of Human Rights Impact Assessments to support ongoing review, monitoring and remediation activities
- the use of additional suitable processes and procedures to assess and address the risk of modern slavery where considered appropriate, such as questionnaires and training
- employee recruitment and selection practices in accordance with relevant CIMIC Policies and Procedures
- modern slavery training requirements.

As part of CIMIC's continuous review of its governance framework, in 2023, CIMIC commenced work on reviewing and updating the scope of its existing framework to become a broader Human Rights Policy and Procedure, in line with evolving local and international developments. This will incorporate the relevant modern slavery requirements and associated controls and tools. The revised governance framework will be implemented in the Group in 2024.

A range of activities facilitate modern slavery due diligence across the Group:

- The convening of Modern Slavery Committees which engage People, Procurement, Legal, Compliance, Sustainability and Communications functional leads at the parent company level, and at a joint parent and Operating Company level. These Committees create the opportunity for cross-Group consultation, collaboration and co-ordination, including with respect to internal and external requirements. The Committees' objectives are to identify modern slavery risks and mitigations for our operations and supply chains, share ideas for continuous improvement and integrate appropriate controls with existing business processes.
- The use of a Compliance Working Group, which is a collaboration of our Operating Companies' compliance representatives and other functional representatives as relevant to the particular compliance topic. In the area of modern slavery, the group assists with driving and tracking modern slavery compliance (among other topics) and is part of our process for cross-Group consultation and engagement.
- The conduct of periodic reviews, by the Group Compliance Manager, assessing the effectiveness of our Operating Companies' use of the Group's third-party screening tool (discussed further below), including reviewing activities addressing modern slavery risk.
- The investigation, evaluation and measurement of the effectiveness and adequacy of CIMIC Policies and the Code of Conduct, by the Internal Audit Team, who perform an independent assurance function and provide reports to the Board. Internal Audit also provides independent and objective assurance on the adequacy and effectiveness of the Group's systems for risk management, internal control and governance, along with recommendations to improve the efficiency and effectiveness of these systems and processes.
- Ethical matters are presented to the Reportable Conduct Group for each Operating Company and at the CIMIC level, and periodic Group reports are provided by CIMIC to the Board's ECSC.



Data Centre, Technology sector, LEIGHTON ASIA





Engineering and technical services, Australasia, EIC ACTIVITIES

## Grievance and reporting mechanism

Open communication is key to maintaining our Code of Conduct. We encourage our employees, subcontractors and partners to voice their concerns should they come across any potentially unethical practices - including any human rights grievances or concerns.

Our Complaints and Investigation Procedure, Workplace Behaviour Policy and Whistleblower Policy, confidential, independent Ethics Line, and approach to investigating, addressing and remediating breaches, all work together to encourage and reliably manage reporting of any potential unethical practice.

Whistleblowers can remain anonymous and disclosures, including modern slavery concerns, may be referred to the authorised Business Conduct Representative who ensures that any disclosure is investigated appropriately, promptly and confidentially. CIMIC and Operating Company working groups, management committees and specialist roles, including CIMIC and each Operating Company's Business Conduct Representative<sup>4</sup> (BCR) and Reportable Conduct Group<sup>5</sup> (RCG), further support engagement, monitoring compliance and continuous improvement across the Group.

The Workplace Protection Officer is responsible for safeguarding the interests of any Whistleblower within the organisation.

 <b>ACCESSIBLE</b>	 <b>CONFIDENTIAL</b>	 <b>RESPONSIVE</b>
<p>Employees, sub-contractors, third party suppliers, clients and partners can raise a concern about unethical practice with a Manager, a Manager's manager, a Business Conduct Representative or our Ethics Line.</p>		<p>Non-compliances are addressed in accordance with our Complaints and Investigation Procedure and reported to the relevant Business Conduct Representative, Reportable Conduct Group, General Counsel and on to the Board's Ethics, Compliance, and Sustainability Committee.</p>

**We encourage reporting, and address, remediate and review for improvement.**

CIMIC Group's grievance and reporting mechanism. For more information go to [cimic.com.au/our-group/governance/ethics-line](http://cimic.com.au/our-group/governance/ethics-line)

<sup>4</sup> The Business Conduct Representative is a senior person within the Legal function who supports the operation of the Code of Conduct.  
<sup>5</sup> The Reportable Conduct Group comprises the Chief Executive Officer or Managing Director, Chief Financial Officer, General Counsel, and Head of People.



Kaban Green Power Hub, Queensland, UGL

## Procurement

Our procurement framework provides policy, systems and processes to support supply chain due diligence.

Activities include assessing risks in our applicable business sectors and conducting comprehensive due diligence and vetting of subcontractors, suppliers and third parties engaged by our businesses.

As part of the framework, the Group's Third Parties Policy and Procurement Policy incorporate:

- the management of modern slavery risks into our supplier registration (a business integrity check)
- the screening and onboarding process
- a suite of standard template commercial contracts to be used wherever possible
- a set of requirements for suppliers' management of their suppliers.

This approach is key to CIMIC Group building and maintaining a reliable and trusted supply chain, and proactively identifying and managing modern slavery risks throughout the term of each contract.

### Supplier screening and onboarding

Our Third Parties Policy, Modern Slavery Protocol and supplier onboarding process include specific modern slavery due diligence requirements for those we work with.

CIMIC has implemented an internationally recognised due diligence solution to screen third parties for a range of risk factors – including the risk of modern slavery.

This solution is used to evaluate and monitor vendors, suppliers, and business partners for a range of risks including, but not limited to, the following areas:

- legal status
- watch-lists including sanctions and enforcements, adverse litigation and Politically-Exposed-People (PEP) lists
- country and industry risks
- modern slavery risks, bribery and corruption due diligence by screening the Corruption Perception Index and the Global Slavery Index
- adverse media.

The solution leverages information from the Global Slavery Index prepared by the Walk Free Foundation, and records of adverse media are collected from various sources – adverse news includes modern slavery allegations and breaches.

Based on a multi-factor risk assessment, each supplier is allocated a risk-rating which triggers additional review and assessment and further investigation and due diligence where applicable. Identified risks may lead to the preparation of corrective action plans, imposition of conditions, or in some cases, the supplier may be rejected from working with CIMIC Group entities. Accepted suppliers and other third parties are subject to continuous monitoring in the tool for any changes in key risks, for example a change in an entity's legal status or any Watchlist changes.

Since its implementation, and as at December 2023, the Group has risk assessed more than 51,000 suppliers.<sup>6</sup> In 2023 we onboarded 4,277 new suppliers.

Supplementing supplier screening via the tool, as part of the supplier registration and pre-qualification process, our Operating Companies require suppliers to complete template supplier pre-qualification questionnaires. Information provided via the questionnaire assists with

<sup>6</sup> In addition to the ~42,700 suppliers who have been accepted by CIMIC, over 2,700 applications are pending and CIMIC has rejected in excess of 3,700 applications to be a supplier on various grounds, which can include modern slavery. Approximately 2,000 have expired.



informing our businesses of any potential vendor risks in areas such as health and safety, quality, financial risks, compliance, and relevant modern slavery and ESG factors.

Suppliers are required to comply with applicable law and the CIMIC Code of Conduct, and to complete a declaration confirming that no slavery, forced or child labour has been used anywhere by the third party or, to the best of the third party's knowledge, by any direct suppliers to the third party.

The declaration specifically requires suppliers to disclose whether they have:

- been subject to or received any prosecutions, regulatory notices, tendering restrictions, sanction notices, litigation or arbitration concerning allegations of modern slavery or breaches of human rights by their employees or subcontractors and suppliers
- been found guilty of a criminal offence which would include modern slavery crimes under ss 270 and 271 of the Criminal Code (Cth)
- a compliance management program in place to meet business integrity laws and regulations, including those relating to modern slavery.

Suppliers are also required to notify CIMIC if they become aware of any behaviours that are in contravention of applicable laws and confirm they will not use any payments received from CIMIC in violation of modern slavery laws and regulations.

### Template commercial contracts

Our Group Procurement Policy requires Operating Companies to engage suppliers using CIMIC Group's suite of template commercial contracts wherever possible. The suite includes a number of different forms of contract which can be utilised depending on the scope, location, value and complexity of the works

or services to be provided, and the risk profile of the relevant project.

Our template commercial contracts require suppliers to comply with the Group's Code of Conduct, ensuring alignment with the Group's expected behaviours.

The contracts also require suppliers to warrant that they have not been convicted of an offence relating to modern slavery, that they will not breach any modern slavery legislation and that they will comply with any requests of the Operating Companies to comply with all modern slavery legislation, including providing information and documents, and allowing interviews to be undertaken.

### Indirect supplier controls

The number of indirect suppliers involved in our businesses is substantial. As a supply chain extends, influencing the behaviours and conduct of indirect suppliers is a greater challenge. By raising awareness, engaging ethical direct suppliers, obliging our supply chain to reject the use of modern slavery, and performing due diligence, we can gradually exert more influence.

Our contracts require our direct suppliers to warrant that their own suppliers enable them to comply with obligations under the CIMIC engagement. Our direct suppliers must:

- ensure their own suppliers read, understand and comply with the CIMIC Code of Conduct which contains information relating to modern slavery
- allow the Operating Company to conduct an independent audit of indirect suppliers to ensure, amongst other things, that they are conducting their business in a proper manner and in accordance with applicable codes of conduct and generally accepted business ethics.

# DIGITALISATION SUPPORTING SUPPLY CHAIN DUE DILIGENCE AND MANAGEMENT

## **Leveraging integrated technologies to understand and manage our supply chain**

CIMIC Group is using its integrated digital delivery capability to continuously improve information and data management, operational performance and ESG outcomes. This includes linking a range of digital solutions to support our due diligence processes and supply chain governance.

Our approach includes using a mix of leading industry tools and developing our own proprietary solutions to provide greater transparency, simplicity, and control in the management of our supply chain. Examples from our suite of tools are described below.

### **Supplier screening and onboarding**

We use a third-party screening tool to evaluate and monitor vendors, suppliers and business partners for risk factors. These include, but are not limited to, legal status, watchlists (e.g. sanctions / enforcements / PEPs), global slavery index, corruption perception index, country risk, industry risk, subject entity risk and any adverse media, including in areas such as human rights, health and safety, impacts on the environment, regulatory matters and other risk factors. The tool enables continuous monitoring of third parties for

changes in key risks following acceptance. See further detail in this statement, *Assessing and addressing the risk of modern slavery – Procurement*.

### **Supplier management**

Our supply chain visibility is enhanced through a custom-built supplier management and procurement software solution. This secure, cloud-based application supports procurement, from supplier registration to contract award. It also serves as our register of suppliers. The software's features include financial and non-financial evaluations. It provides a centralised supplier database which can be accessed and updated by projects.

The data we collect from suppliers via this platform in the way of questionnaires and forms offers valuable insights into potential supplier risks, such as health and safety, quality, financial risks, compliance, and ESG factors. This key information aids our due diligence processes. The supplier database also helps us to engage efficiently with local, social and Indigenous suppliers to ensure they are provided opportunities to work with the Group.

## People and employment

CIMIC Group focuses on creating a workplace culture which puts safety first and fosters our Principles of Integrity, Accountability, Innovation and Delivery. We invest in our people to build safe, rewarding careers, and prioritise cultivating a respectful and inclusive workplace, advancing gender equality, increasing indigenous employment and the use of indigenous suppliers, and investing in local employees where we operate.

### People policies

Our overarching People framework guides operations across our businesses, markets and geographies, facilitating compliance with, and often exceeding, local laws.

Policies and processes that help to build respectful, safe and inclusive work environments and to mitigate modern slavery risks include our:

- Recruitment Policy, procedures and management systems with formal approval gates including verification of the candidate's identity and their right to legally work
- Health and Safety Policy
- Workplace Behaviour Policy
- Diversity and Social Inclusion Policy
- Flexible Working Policy
- Parental Leave Policy
- Family and Domestic Violence Policy
- Redundancy Policy.

Our Internal Audit team audits our Operating Companies' compliance with CIMIC Group policies.



## RESPECTFUL INCLUSIVE WORKPLACES

### *Updating policies in step with workplace law changes*

CIMIC Group continually reviews and updates the framework of policies and processes, that help to build safe, respectful, and inclusive work environments, free of any form of modern slavery.

In 2023, we updated the following policies to align with Australian workplace law changes:

- Workplace Behaviour Policy: outlines general standards of workplace behaviour and defines what behaviours are unacceptable in our workplaces including bullying, harassment, sexual harassment, hostile workplace environments, discrimination, victimisation, and vilification.
- Complaints and Investigation Procedure: new streamlined process for making complaints in relation to the Workplace Behaviour Policy and the Code of Conduct - including preliminary steps for early intervention, informal or formal complaints, contacting StopLine to make a complaint, and how to contact a Business Conduct Representative about a Code breach.
- Whistleblowing Policy: updated defining who is a whistleblower, how to make a disclosure, safeguards for confidentiality, anonymity, personal information, and outlines how whistleblowers are protected.

Under our Group Code of Conduct all CIMIC Group employees have a responsibility to take active steps to be aware of, understand, and comply with all Group policies and procedures and applicable laws and regulations.

We recognise the right of employees to freely associate and collectively bargain, and aim to fairly, consultatively, and constructively engage with workers, union representatives and regulators.

Olive Downs Complex, Queensland, SEDGMAN

## Human Rights Impact Assessments (HRIA)

Our HRIA program, commenced in 2017, prioritises assessments in geographies where we have a significant workforce. We have undertaken HRIAs in our construction operations in India (2017), the Philippines (2019), Papua New Guinea (2020), Hong Kong (2021) and Australia (2022–2023). Further, in 2021, our minerals processing business, Sedgman, conducted a HRIA of a China based supplier.

In 2022, CIMIC initiated HRIAs at a CPB Contractors project in Western Australia and a UGL project in Victoria, Australia, with reports completed in 2023.

In 2023, HRIAs were initiated in Malaysia at a Leighton Asia data centre project, and in Victoria, Australia at a Pacific Partnerships and UGL solar farm project. Both of these HRIAs are scheduled for completion in 2024.

### CIMIC GROUP HRIA PROGRAM APPROACH

#### ***Managing a consistent, disciplined approach to assessing human rights impacts***

CIMIC Group's HRIAs are based on the Human Rights Assessment Quick Check prepared by the Danish Institute for Human Rights.

The Group's HRIA and Operating Company self-assessment tools assess categories including governance and leadership; people management; health and safety; community engagement; security arrangements; country risks; and procurement.

Within the people management area, the HRIA and self-assessment tools audit compliance with our template employment contracts and review modern slavery indicators such as: wages and benefits, working hours, employment criteria (such as age), freedom of association, health and safety, unlawful discrimination and worker accommodation.

Assessment steps include engaging leadership, undertaking risk assessment and due diligence, conducting site visits, reporting findings and developing action plans.

Completed HRIAs have also highlighted where CIMIC Group is providing employment conditions which are more favourable than common industry practice and/or required by local legislation. Some of these areas include the provision of higher standards for safety, training of unskilled workers and worker medical services.

In 2023, CIMIC reviewed and updated its HRIA risk assessment tool and criteria to bring it in line with more recent guidance published by the Danish Institute for Human Rights, for implementation in the Group's HRIAs from 2024. This will form part of the revised human rights governance framework for CIMIC Group.



Mackay manufacturing site, Queensland, UGL



## HUMAN RIGHTS IMPACT ASSESSMENTS – AUSTRALIA 2022 – 2023

### ***Developing capability for managing the risk of modern slavery in our operations in Australia***

CIMIC Group's CPB Contractors and UGL have recently completed Human Rights Impact Assessments (HRIA) at a construction project in Western Australia and a services project in Victoria, respectively.

The assessments, initiated in 2022 and completed in 2023, have been undertaken as part of CIMIC Group's commitment to due diligence to reduce the risk of modern slavery in our operations and supply chain.

This is the first time we have conducted HRIAs in Australia. The Australian sites were chosen for assessment given the high number of people we employ in the country and our awareness that we operate in some markets with supply chains which have a potential exposure to modern slavery risks.

Some of the positive findings from the HRIAs showed that our projects met key criteria such as:

- strong compliance training completion rates
- clear policies and processes in place prohibiting forced, bonded and unlawful child labour

- clear policies and mechanisms in place to support freedom of association.

Consistently, participants' feedback reinforces the interactive assessment process's value. Positives include the experience improving team members' ability to identify and assess indicators of modern slavery risks and understanding of our management systems. It also opens opportunities for conversations about ways to continuously improve how we support our people. For example, the Australian HRIAs completed in 2023 identified opportunities such as further promoting awareness of how to report concerns and access grievance mechanisms; others included providing gender specific PPE and arranging easier access to breast-feeding facilities.

CIMIC Group's HRIA program commenced in 2017. Seven HRIAs have been completed to date and two more were initiated in 2023 for completion in 2024.

## HUMAN RIGHTS IMPACT ASSESSMENTS – GROWTH AREAS 2023 – 2024

### *Assessing modern slavery risks in our growth areas of data centres and renewables*

Data centres and renewable energy are growth areas for CIMIC Group. In 2023, the Group initiated HRIAs at:

- A Leighton Asia site in Malaysia, where the scope of work includes the construction of a data centre.
- A Pacific Partnerships and UGL site in Victoria, Australia, where the scope of work includes delivery and operation of the Glenrowan Solar Farm located approximately 230 kilometres north-east of Melbourne, Victoria. Development rights for the 130 MWdc solar project were acquired by Pacific Partnerships in 2021 and the project commenced exporting to the grid in November 2023. UGL is the project's delivery and operations partner.

Malaysia is a newly industrialised economy. Leighton Asia forecasts significant new work in the country and it is for this reason that the data centre was selected for the conduct of an HRIA so that the Group can understand and mitigate against modern slavery risks.

Meanwhile, an HRIA was initiated for the Glenrowan Solar Farm, given that the construction industry in Australia and the import of solar panels<sup>7</sup> are recognised as potentially higher risk for modern slavery.

The scoping of both HRIAs involved identifying the key geographical, environmental, and social characteristics of the project (including consideration of different impact areas and right-holder groups) such as the local communities, location, the workers and contractors, and the suppliers and procurement.

CIMIC Group HRIAs follow a four-step process:

- 1. Research** – Conducting desktop research, data collection and analysis across:
  - legal regulatory frameworks
  - governance instruments, including policies and standard operating procedures
  - workforce information, including workforce data, payroll, employment contracts, and training records
  - health and safety management, including Total Recordable Injury Frequency Rates, and incident records
  - client information
  - service providers, including labour hire contracts.
- 2. Site visit** – Conducting a project visit including observation of the workplace including offices, work site and accommodation facilities and interviews with:
  - operational leaders and key functional leaders for human resources, legal and safety
  - vulnerable employee groups
  - labour hire supplier(s).
- 3. Report** – Preparing a full report of findings, based on desktop research and site visit.
- 4. Executive briefing** – Delivering the HRIA report and a briefing to the Operating Company Executive Leadership Team on findings, recommendations and action plans as required.

The Leighton Asia and Pacific Partnerships-UGL HRIAs are scheduled for completion in 2024.

<sup>7</sup> Source: Walk Free Foundation, The Global Slavery Index 2018 Findings / Country studies – Australia <https://www.globalslaveryindex.org/2018/findings/country-studies/australia>





## Education and training

Our mission includes our intent to provide safe, rewarding and fulfilling careers for our people. On-the-job development is complemented with a range of learning experiences that build skills and technical capabilities and these are underpinned by our Principles and Code of Conduct. In 2023, we delivered 523,952 hours of training across the Group spanning multiple training courses, which equates to more than 21.9 hours per annum for each direct employee.

Education and training are integral to our compliance framework, and to engaging and upskilling our people in meeting their legal, regulatory and compliance responsibilities. We monitor, report and manage training completion rates through our Group's centralised learning management system, One Learning, and by using on-site project records.

### Code of Conduct and other compliance training

Our foundational Code of Conduct training covers CIMIC Group's Principles and Code of Conduct, ethical behaviour, and key policies including health, safety and environment, workplace behaviour, including anti-bullying and harassment, anti-bribery and corruption, and conflicts of interest.

We require employees to complete Code of Conduct training via e-learning within three months of their commencement with refresher training completed every two years. We also provide more detailed face-to-face Code training to employees in high-risk roles.

In 2024, we will introduce an additional Code of Conduct online learning activity to be completed in the alternate year to Code training, ensuring team members refresh their understanding of the Code annually.

Other compliance training modules which are mandatory for all staff to complete, and which are provided via e-learning include whistleblower; equal employment opportunity, bullying and harassment; cultural awareness; IT cyber security awareness; and family and domestic violence training. Additionally, depending on roles, some employees are also required to complete additional specific training in particular subject areas, which can be face to face or online.

In 2023, the Group rolled out new sexual harassment training to more than 1,500 of our senior managers across our Operating Companies in Australia, Canada, Hong Kong, and New Zealand. This training continues.

Our Operating Companies also provide additional specialised face-to-face training on relevant topics.

### Modern slavery

Supporting Code of Conduct and other compliance training, the Group has a standalone modern slavery training module which is now mandatory for all staff to complete. This training is designed to equip our people to recognise and report modern slavery risks and is made available online for staff.

Communication resources and Group-wide alerts support the training, facilitating greater understanding of the issue and its importance to our business.



## 5. 2023 ACTIONS

In 2023, a range of actions were taken to enhance our capabilities to identify, mitigate and prevent modern slavery risks across the Group's operations and supply chain, and respond should any impacts occur.

### OPERATIONS

#### Governance and compliance

- Continued reinforcing CIMIC's Modern Slavery Policy and Protocol across the Group, which sets out the responsibilities and accountabilities for modern slavery risks and controls, whilst continuing to progress the review of the broader human rights governance framework.
- Continued embedding CIMIC's Compliance Policy and Procedure across the Group, including Modern Slavery Plans and other controls and tools.
- Continued cross-Group consultation, engagement and co-ordination via the Modern Slavery Committee Meetings and the Compliance Working Group representatives.
- Continued to review, assess and understand the human rights risks for each Operating Company and the Group, including through operational country risk assessments in countries where we operate.

#### People and employment

##### Human Rights Impact Assessments (HRIA)

- Two HRIAs initiated by CIMIC in 2022 were completed in 2023 by CPB Contractors, at a construction project in Western Australia, and by UGL, at a services project in Victoria.

- Two further HRIAs were initiated in 2023 for completion in 2024 - a Leighton Asia site in Malaysia and a Pacific Partnerships / UGL site in Victoria, Australia.
- The HRIA risk assessment tool was updated to align to more recent guidance published by the Danish Institute for Human Rights, for implementation in CIMIC Group's HRIAs from 2024.

##### Training

- Delivered 523,952 hours of training across the Group spanning multiple training courses, including mandatory compliance topics.
- Delivered ongoing Code of Conduct and other compliance training in topics such as whistleblower, equal employment opportunity, bullying and harassment, cultural awareness, IT cyber security awareness, and family and domestic violence training.
- The Group rolled out new sexual harassment training to more than 1,500 of our senior managers across our Operating Companies in Australia, Canada, Hong Kong, and New Zealand. This training continues.
- Our Operating Company, CPB Contractors, continued to implement its a Young Persons in the Workplace guideline to appropriately manage employees who are undertaking traineeships and apprenticeships and are under the age of 18 years.



Minerals Processing, Queensland, SEDGMAN

## SUPPLY CHAIN

### Governance and compliance

- Continued reinforcing CIMIC's Third Parties Policy, Group Procurement Policy and Modern Slavery Policy and Protocol across the Group, which set out the responsibilities and accountabilities for third party/supply chain due diligence requirements and associated risk identification and controls (which includes modern slavery risks).
- Continued cross-Group consultation, engagement and co-ordination via the Modern Slavery Committee Meetings and the Compliance Working Group representatives.

### Procurement

- Risk assessed the 19,211 suppliers we worked with in 2023.
- Processed approximately 4,277 new suppliers through the supplier onboarding process, including the screening tool. Identified risks require further investigation and assessment, and where applicable, remedial plans are implemented, conditions imposed or the supplier rejected from use.
- Undertook periodic review of the third party screening tool.
- Continued to perform supply chain risk assessments, having regard to commodity, industry, jurisdiction, spend, dependency, length of relationship and reputation.

## ASSESSING EFFECTIVENESS

Our assessment of effectiveness is evidence based and includes monitoring and analysing risk analysis and compliance assurance and internal audit results, supplier screening and risk assessment, monitoring and closeout of corrective action plans, training participation rates, communications engagement, Human Rights Impact Assessment results, the completion of improvement plans and responsiveness to grievances.

Quantitative data and regular qualitative reviews facilitated by our governance framework shape our annual planning process.

Key touch points which support our assessment and planning process include our:

- cross-Group engagement at the Modern Slavery Committees and via Compliance Working Group representatives (see section 4)
- risk analysis (see section 3).



Mackay manufacturing site, Queensland, UGL

## 6. LOOKING AHEAD

### 2024 PRIORITIES

Over the next year, CIMIC Group will focus on continuing to:

- enhance our understanding and knowledge of modern slavery risks, in collaboration with our Operating Companies, HOCHTIEF Australia and HOCHTIEF AG
- implement a Human Rights Policy and Procedure, in line with evolving local and international developments, which will incorporate and expand on the relevant modern slavery requirements and associated controls and tools under the existing policy documents
- implement the revised HRIA risk assessment tool (and methodology) within the Group for future HRIAs and continue to assess and update other modern slavery tools and controls where relevant
- continue to conduct a review of our approach to modern slavery risk management with reference to the Australian Government's review of the Modern Slavery Act 2018 (Cth)
- continue to risk assess new suppliers, vendors and business partners using the third party screening tool and, if necessary, develop and implement appropriate corrective actions plans and/or remediation measures
- monitor existing suppliers, vendors and business partners using the third party screening tool to identify, among other things, any breaches, fines or sanctions in relation to modern slavery and other ESG risks
- build our people's capability to recognise and report risks of modern slavery, including via CIMIC's grievance mechanism
- continue raising employee awareness via mandatory Modern Slavery training and other compliance training modules
- continue our modern slavery risk monitoring and reporting activities.

### ONGOING ENGAGEMENT AND COMMUNICATION

We will continue to engage with Government, industry, regulators, and other organisations to build awareness and understanding to combat modern slavery.

Engagement is a key input to our continuous focus on modern slavery risks and developing a trusted supply chain.

We value gaining and sharing insights with and from relevant organisations, including:

- Government and regulatory bodies in the different regions in which we operate – Our Legal and Compliance teams monitor for updates on the status of legislation and developments in the area of modern slavery.
- Australian Border Force Modern Slavery Business Engagement Unit – Relevant resources are consulted where applicable to aid our understanding of or to obtain guidance in relation to modern slavery matters.
- Industry Associations – We value and consider guidance, advice and recommendations provided by industry associations in the regions in which we operate to assist with identifying and addressing modern slavery risk in the construction, services and resources sectors. We hold memberships with multiple trade, industry and not-for-profit organisations, at local, regional, national and international levels.
- External presentations, seminars or forums – Members of our People, Legal and Compliance teams attend and/or participate in external presentations, seminars or forums to improve their awareness of modern slavery and ESG risks and to embed learnings within the business.



## APPENDIX

# MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

### Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body of

HOCHTIEF AUSTRALIA HOLDINGS LIMITED ABN 17 103 181 675

as defined by the Modern Slavery Act 2018 (Cth)<sup>8</sup> (“the Act”) on 18 April 2024

### Signature of Responsible Member

This modern slavery statement is signed by a responsible member of

HOCHTIEF AUSTRALIA HOLDINGS LIMITED ABN 17 103 181 675

as defined by the Act<sup>9</sup>.



Mr David Robinson

Director of HOCHTIEF AUSTRALIA HOLDINGS LIMITED

### Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s	Page number/s
a) Identify the reporting entity.		2
b) Describe the reporting entity’s structure, operations and supply chains.		4-7
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.		8-9
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.		10-25
e) Describe how the reporting entity assesses the effectiveness of these actions.		25
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*		2
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**		N/A

\* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement ‘Do not own or control any other entities’ instead of a page number.

\*\* You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

8 Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

9 Section 4 of the Act defines a responsible member as: (a) an individual member of the entity’s principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.





Metronet, Western Australia. CPB CONTRACTORS



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