



MODERN SLAVERY STATEMENT FOR FREYSSINET AUSTRALIA PTY LTD

This statement is made by Freyssinet Australia Pty Ltd (ABN 67 000 711 548) for the financial year ending 30 June 2023, in accordance with the Modern Slavery Act 2018 (Cth)

Freyssinet Australia Pty Ltd

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A SUBSIDIARY OF  **SOLETANCHE FREYSSINET**



1. PURPOSE AND REPORTING ENTITY

Freyssinet Australia Pty Ltd (Freyssinet) is a wholly owned subsidiary of VINCI Construction, a global leader in construction and civil engineering. Freyssinet provides specialised engineering services and solutions for the construction, repair and maintenance of structures in various sectors, such as transport, mining, energy, water and building.

Freyssinet operates in Australia and New Zealand, with offices in Sydney, Melbourne, Brisbane, Perth, Adelaide and Auckland. Freyssinet employs over 300 people across these locations.

Freyssinet's supply chain consists of subcontractors, suppliers of materials, equipment and services that are essential for its projects. These include steel, concrete, cables, anchors, bearings, jacks, scaffolding, cranes, trucks, labour hire, design and testing services. Freyssinet sources these supplies from both local and international suppliers.

2. CUSTOMER BASE

Freyssinet has a diverse customer based across Australia and operates in a number of varied markets. Customers include:

- Asset owners (public and private)
- Utility authorities
- State and Local Government Authorities
- Investment trusts
- Developers

Markets include:

- Building
- Marine structures
- Roads and Bridges
- Water and Rail
- Mines and Quarries

3. OUR WORKFORCE

Freyssinet as a workforce of approximately 250 employees. Our employees are diverse in respect to age, skill level, gender, cultural background, religious beliefs and more. We believe this diversity makes our organisation stronger, more adaptable and more cognizant of our obligations to act fairly, transparently and ethically in the marketplace. The work performed by Freyssinet is Australia based, with some travel required across State borders from time to time.

Our labour force has registered enterprise agreements made in consultation with industry representatives (where nominated) and exceeds the requirements of an underlying award. Salaried staff all have employment contracts that meet or exceed the requirements of the Fair Work Act and any underlying award.

4. OUR VALUES AND BEHAVIOURS

Our values and behaviours are those which are shared values of the global VINCI entities. These values and behaviours are not only by all VINCI employees but are also used as guide for our interactions with key stakeholders, subcontractors and suppliers.

At a global level, VINCI aims to engage in its various market areas, acting in the public interest whilst maintaining humanist values. It does this by ensuring its policies on matters of conduct, health and safety and human rights are enshrined in each of its business units and for those values to form the basis of all business decisions and interactions with employees, customers, suppliers and subcontractors.



In addition, at a global level VINCI has developed its Guide on Human Rights which sets out its policy position on the following matters:

- Labour Migration and Recruitment Practices
- Working Conditions
- Living Conditions
- Human Rights Practices in the Value Chain; and
- Local Communities

All of the above matters fall directly within the scope of Modern Slavery.



5. SUPPLY CHAINS

The procurement Freyssinet undertakes ranges from plant and equipment to skilled labour and specialist services. The procurement generally fall is the following categories:

Business Services	Office supplies, equipment, IT infrastructure and hardware, telecommunications, office maintenance, insurance, travel and accommodation, property rental, property management services
Project Services	Professional consultants, legal support, safety equipment, training, PPE suppliers
Equipment	Motor vehicles, hard tools, custom plant, pumps, testing equipment, drones
Materials and parts	Strand, anchors, duct, blasting media, coating, grout, concrete, cathodic protection products, PT product supplies
Subcontractors	Plant hire, specialist contractors, access providers, fabrication providers, waste disposal
Internal Sourcing	Post Tensioning Range of Products, Bridge Bearings, Cathodic Protection, Remedial Products

6. RISKS

Freyssinet recognises that modern slavery is a serious human rights issue that can occur in any industry or country. Modern slavery refers to situations where one person deprives another person of their freedom or exploits them for personal or commercial gain. This includes slavery, servitude, forced labour, debt bondage, human trafficking, child labour and other forms of exploitation.

Freyssinet is committed to conducting its business in an ethical and responsible manner and respecting the human rights of all its stakeholders. Freyssinet has a zero-tolerance policy towards any form of modern slavery in its operations and supply chain.

Freyssinet has conducted a risk assessment to identify and assess the potential areas of exposure to modern slavery in its operations and supply chain. The risk assessment was based on various factors, such as the nature of the industry, the geographic location, the type of supplier, the level of control and influence, and the availability of information.

The risk assessment revealed that the overall risk of modern slavery in Freyssinet's operations is low, as Freyssinet operates in countries that have strong legal frameworks and enforcement mechanisms to protect human rights and labour standards. Freyssinet also has robust policies and



procedures to ensure compliance with applicable laws and regulations, as well as to promote a culture of integrity and respect among its employees.

The risk assessment also indicated that the potential risk of modern slavery in Freyssinet's supply chain is moderate, as some of Freyssinet's suppliers are in countries that have higher prevalence or vulnerability to modern slavery. Some of the products or services sourced from these countries may also involve high-risk sectors or activities, such as steel production, mining, construction and manufacturing.

7. ACTIONS

Freyssinet has a preferred supplier list that is based on our assessment and our confidence that they comply with the standards and requirements under the law and our corporate standards. The majority of our product range is sourced from a related entity, Freyssinet Products Company (FPC) based in Milan. FPC is a reporting entity in Europe and has a robust process in place to manage Modern Slavery Risks in its supply chain.

Freyssinet has taken the following actions to address the risks of modern slavery in its operations and supply chain:

- **Policies:** Freyssinet has adopted various policies that reflect its commitment to ethical business conduct and respect for human rights. These include:
 - Code of Ethics and Conduct: This policy sets out the core values and principles that guide Freyssinet's behaviour and decision-making. It covers topics such as compliance with laws and regulations, anti-corruption, health and safety, environment, diversity and inclusion.
 - Human Rights Policy: This policy outlines Freyssinet's respect for human rights as defined by the Universal Declaration of Human Rights and other relevant international standards. It covers topics such as non-discrimination,
 - freedom of association,
 - fair wages,
 - working hours,
 - prevention of harassment,
 - child labour,
 - forced labour,
 - human trafficking.



- Whistleblowing Policy: This policy encourages employees and other stakeholders to report any suspected or actual misconduct or wrongdoing within Freyssinet or its supply chain. It provides a confidential and secure channel for reporting and protects whistle-blowers from any retaliation.
- **Due Diligence:** Freyssinet has implemented a due diligence process to assess and monitor its suppliers' compliance with its policies and standards on human rights and modern slavery. This process involves:
 - Code of Conduct: This document sets out the minimum requirements that Freyssinet expects from its suppliers in relation to human rights and modern slavery. It covers topics such as compliance with laws and regulations, anti-corruption, health and safety, environment, diversity and inclusion, child labour, forced labour, human trafficking.
 - Questionnaire: This document collects information from suppliers on their profile, policies, practices and performance on human rights and modern slavery. It helps Freyssinet to identify and evaluate the level of risk and compliance of each supplier.
 - Audit: This is a verification process that may involve site visits, interviews, document reviews and observations to verify the information provided by suppliers and to identify any gaps or issues that need to be addressed.
 - Corrective Action Plan: This is a remediation process that requires suppliers to implement corrective actions to resolve any non-compliance or improvement areas identified during the audit. It also involves follow-up audits to monitor the progress and effectiveness of the corrective actions.
- **Training:** Freyssinet has provided training and awareness programs to its employees and suppliers on human rights and modern slavery. These programs aim to increase the knowledge and understanding of the issues, risks and responsibilities related to human rights and modern slavery. They also aim to enhance the skills and capabilities of employees and suppliers to prevent, detect and report any incidents or concerns of modern slavery.



8. CONSULTATION WITH OWNED OR CONTROLLED ENTITIES

Freyssinet does not have any owned or controlled entities that are required to report under the Modern Slavery Act 2018 (Cth). Therefore, this statement does not cover any other entities.

9. APPROVAL AND SIGNATURE

This statement has been approved by the board of directors of Freyssinet Australia Pty Ltd on 30 January 2023.

Signed by:

A handwritten signature in black ink, appearing to read "G. More".

Director of Freyssinet Australia Pty Ltd

Date: 30 January 2023

10. ANNUAL SUBMISSION

This statement will be submitted to the Australian Government's Online Register for Modern Slavery Statements within six months after the end of the financial year.

This statement will also be published on Freyssinet's website and communicated to its stakeholders.