



# INTRODUCTION

Fulton Hogan Australia Pty Ltd (FHA) submits this Modern Slavery Statement for the financial year ending 30 June 2023.

This joint statement is provided in accordance with the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) and sets out the actions taken by FHA and its wholly owned and controlled entities to identify, assess and address modern slavery risks in its operations.



## OUR COMMITMENT

Fulton Hogan is committed to acting ethically and with integrity and transparency in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We recognise our responsibility to work with various stakeholders to identify internal and supply chain risks of modern slavery practices and addressing those risks through training, contract management and good governance practices.

In order to achieve that purpose, FHA adopted a uniform Anti Modern Slavery Process in 2019 which provides mandatory requirements and guidance on how to identify and prevent modern slavery in FHA and its supply chains. The process requires FHA to undertake the key actions described herein.



# OUR REAL VALUES

Our people are the most important part of our business, and our REAL values are a way to keep the whole Fulton Hogan family on the same page.

## Respect

We understand, listen and learn

We respect our differences

We take care of ourselves and others

We treat others the way they expect to be treated

## Energy & Effort

We bring out the best in everything we do

We do it once, we do it right

We never give up

We keep things simple

We have fun

## Attitude

We are one Fulton Hogan

We take pride in everything we do

We do what we say

We challenge and improve

We work together, win together and celebrate together

## Leadership

We value and grow our people

We do the right thing

We are fair and trustworthy

We are accountable

The standard we walk past is the standard we set

We are humbly smart

# OUR OPERATIONS AND STRUCTURE

1933

Founded in  
New Zealand



1981

Fulton Hogan  
commences  
operations in  
Australia



Fulton Hogan is a leading infrastructure and civil engineering company with 90 years' experience in the infrastructure, transport, water, and telco sectors and employs over 4,100 people in regional and city-based locations across Australia.

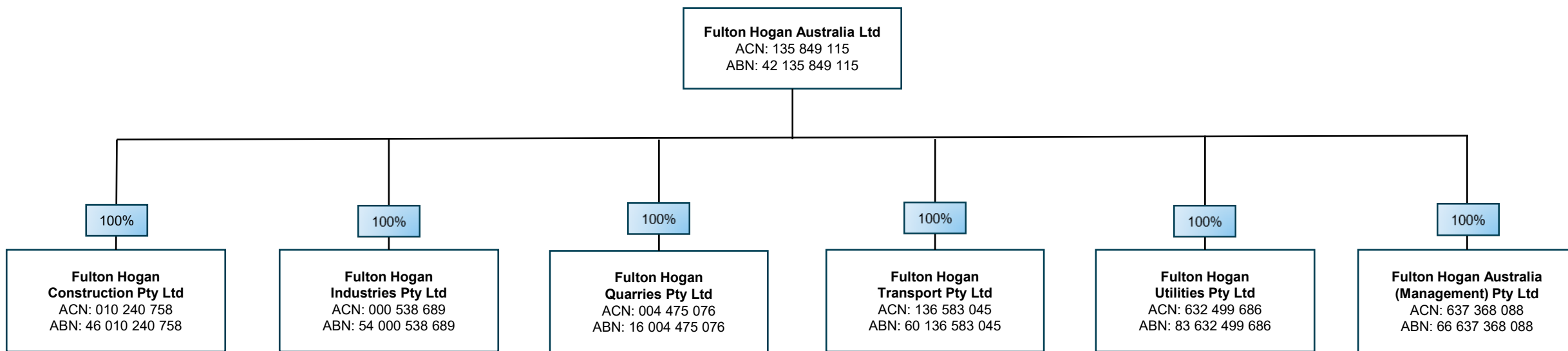
The Fulton Hogan Group is comprised of 35 controlled entities, predominantly in Australia and New Zealand. The ultimate parent entity in the Fulton Hogan Group is Fulton Hogan Ltd. FHA is the holding company of 10 of Fulton Hogan's Australian based controlled entities.

This statement covers FHA and each of the entities it controls. FHA is the reporting entity required to issue this statement under the Modern Slavery Act.



# STRUCTURE

A simplified structure of the Fulton Hogan entities covered by this statement is as follows



# OUR OPERATIONS

Infrastructure Services | Construction | Utilities

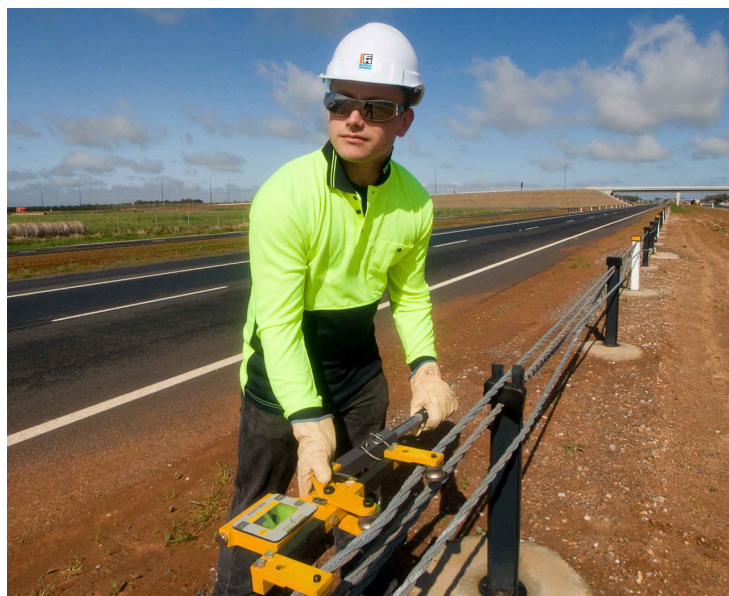


# OUR SUPPLY CHAIN

In the reporting period, FHA spent approximately AUD \$2.35B across more than 9,935 suppliers and subcontractors.

FHA's supply chain is complex, having regard to the diverse nature of FHA's operations. A summary of FHA's key supply chain is set out below.

In the reporting period, the majority of our supply chain was based in Australia. Only 0.24% of our suppliers were based internationally, representing 0.49% of our spend.



## Project Supply

FHA engages various third party subcontractors and suppliers to provide construction related services, products and materials. This also includes machinery and plant hire, as well as traffic management solutions.

## Labour Hire

FHA utilises third party labour hire service providers.

## Logistics

FHA engages third party cartage contractors for asphalt and quarry material logistics.

## Professional Services

FHA retains professional consultants, such as designers and engineers, for project delivery. It also engages various consultants to provide environmental, insurance, legal, financial, information technology and other professional services.

## Cleaning and Maintenance

FHA engages third parties for the provision of cleaning and maintenance services including plant and equipment servicing, site maintenance and office cleaning services.

## Uniform, PPE & Office Supplies

FHA acquires corporate uniforms, personal protective equipment, office supplies and consumables from third parties.

## Utilities

FHA retains various service providers across its business to provide utilities including electricity, gas, water and telecommunications.



# RISKS OF MODERN SLAVERY PRACTICES

FHA prohibits any form of modern slavery within its direct operations. This is achieved by ensuring that:

- All of our direct employees are engaged under individual employment contracts or enterprise bargaining agreements that are in accordance with Fair Work Australia's National Employment Standards. We comply with all applicable employment legislation and industrial awards, and none of our employees are paid less than the minimum wage. We also comply with all superannuation and leave requirements.
- The safety of our employees is paramount, underpinned by our Living Safely Policy which aligns with Australian work, health and safety laws.
- FHA's Whistleblowing process is available to all of FHA'S employees, which allows them to make anonymous reports about reportable conduct, including suspected modern slavery practices or unethical behaviour.

The Global Slavery Index categorises Australia as low risk for modern slavery. Given the low risk profile, and the policies and processes adopted by FHA, FHA considers that it is unlikely to have a risk of modern slavery practices in its permanent workforce.

FHA is aware that a greater risk of modern slavery exists in its supply chains, particularly in the lower tiers of supply chains and jurisdictions outside of Australia. This includes third party labour hire providers, as well as migrant workers.

To minimise that risk, FHA is committed to working with subcontractors and suppliers to ensure their practices are aligned with FHA's expectations concerning modern slavery and has in place clear procurement policies described below to assist in identifying risks of modern slavery in its supply chains.

# KEY ACTIONS TO ASSESS AND ADDRESS THE RISK OF MODERN SLAVERY

Our Anti-Modern Slavery Process applies to FHA and each of the entities that it controls. Therefore, our approach to modern slavery within Australia is 'group wide'.

The Anti-Modern Slavery Process incorporates the following as part of its overall strategy to address risks of modern slavery:

**Policies and Framework:** In addition to its Anti-Modern Slavery Process, FHA has a framework in place to support its REAL values, which includes its Code of Conduct Policy, Living Safely Policy and Whistleblower Process. In particular, the Code of Conduct is based on our values, policies, procedures guiding our daily work and demonstrates our commitment to uphold proper and ethical business practices. The Code is accessible on our internal website and all employees are required to be aware of it and comply with it.

**Procurement Processes:** FHA has a decentralised procurement process including policies and procedures surrounding modern slavery practices of those within our supply chain. As part of this practice, we undertake due diligence checks and certifications from our supply chain by having them complete a capability questionnaire to establish whether or not they engage in modern slavery practices. This due diligence check is critical to ensuring compliance with our Anti-Modern Slavery Process.

**Contractual Obligations:** FHA's contract templates include relevant contractual prohibitions against suppliers/subcontractors engaging in modern slavery practices. They also contain provisions requiring subcontractors to certify that all statutory requirements and wages have been paid, and to comply with our extensive safety regime and standards, again reducing the risk that FHA will contribute to modern slavery practices.

**Labour Hire Providers:** FHA only engage reputable and licensed labour hire service providers.

**Training:** FHA's Code of Conduct Module is an internal training module that includes a section relating to modern slavery, including an overview of the meaning of modern slavery, how to raise concerns and a scenario question. The intent is that this training is available to all employees.

While FHA has historically provided refresher modern slavery training to its commercial teams, in this reporting period, a specific modern slavery training module was presented. FHA will continue to present this annually moving forward.

# KEY ACTIONS TO ASSESS AND ADDRESS THE RISK OF MODERN SLAVERY

**Reporting framework:** All FHA employees are required to raise concerns in accordance with a specified reporting framework if they believe that any Fulton Hogan employee, contractor, supplier or other external party in its supply chains is involved in any of the prohibited practices. Any such reports are to be investigated. Another method of reporting is available via the Fulton Hogan Whistleblower Process, which provides an anonymous and confidential service to report on such matters.

**Continuous improvement:** FHA is committed to continually improving its approach to modern slavery. Employees are encouraged to provide feedback on FHA's Anti-Modern Slavery Process and recommend improvements on a continuing basis. The Anti-Modern Slavery Process is also subject to a formal review at least once every twelve months.

**Membership of Key Industry Bodies:** Fulton Hogan has proactively engaged with industry and sustainability networks to learn and help progress positive action to address modern slavery. Fulton Hogan is a founding member of the Infrastructure Sustainability Council (ISC) Modern Slavery Coalition for the roads sector, which aims to accelerate the eradication of modern slavery from infrastructure supply chains. Since 2019, we have been actively engaged with ISC and other members from the road industry to collaborate on addressing modern slavery risks in the industry.

## HOW WE MEASURE EFFECTIVENESS



During the reporting period, we were not aware of any modern slavery events within FHA, or any modern slavery events which FHA has contributed to or is directly involved with.

FHA's primary methods of measuring the effectiveness of its Anti-Modern Slavery Process are as follows:

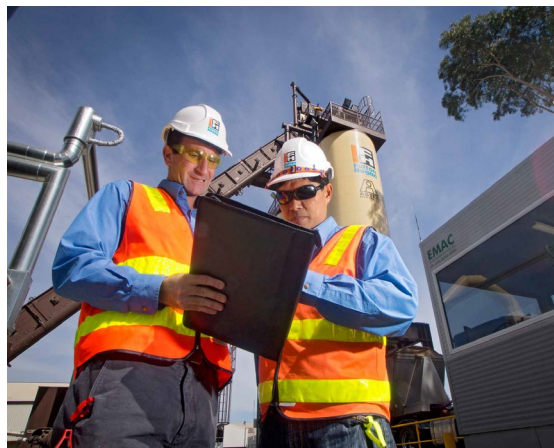
- Undertaking an analysis of employees who had completed FHA'S Code of Conduct Module (which indicated 81% of salaried employees had completed as at the end of the reporting period) which includes a Modern Slavery awareness module;
- Conducting an internal audit to assess compliance with our Anti-Modern Slavery Process, specifically key control measures in place to facilitate adherence to obligations set out in the Modern Slavery Act;
- Our Whistleblower Process, which represents our main grievance mechanism and key method of measuring the effectiveness of our current processes.

We will continue to adopt these steps moving forward.

# LOOKING FORWARD

The intention of this year's audit was to capture a greater sample of our supply chain than that previously undertaken. This was consistent with the proposed steps reported in our last Modern Slavery Statement to include supply chains that may be identified as being at higher risk. FHA is continuing to review its current internal review framework to develop more specific due diligence processes for those supply chains that it identifies as being at higher risk of containing modern slavery risks, including third party labour hire providers and those operating in jurisdictions outside of Australia. FHA is also reviewing third party platforms for future supply chain risk assessment support and due diligence.

In the next reporting period, FHA intends to implement recommendations to address audit findings, which will only further assist it in delivering on its commitment to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.



## CONSULTATION & APPROVAL

The aims of the Anti-Modern Slavery Process include providing clear and uniform guidance across FHA and the entities that we own or control.

As the reporting entity and in preparing this statement, FHA consulted with the entities that it owns or controls. In particular, a copy of this statement was provided to the following internal stakeholders to confirm its accuracy:

- the procurement team responsible for implementing the processes and systems contained in the Anti-Modern Slavery Process;
- the AU legal and risk and assurance teams;
- the FHA CEO, as well as the CEOs of the key operating entities, namely Fulton Hogan Construction Pty Ltd, Fulton Hogan Industries Pty Ltd and Fulton Hogan Utilities Pty Ltd.

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) and has been approved by the Board of Fulton Hogan Australia Pty Ltd.



**Cos Bruyn**

**Managing Director, Fulton Hogan Ltd**