

Ausenco

Modern Slavery Statement 2024



1. Background

The *Modern Slavery Act 2018* Cth (the Act) outlines the obligations of businesses in Australia to manage and report on the risks of modern slavery in their supply chains and aims to strengthen the international effort to eliminate modern slavery. Recent data from the Walk Free Foundation reveals that Australia, the United Kingdom and the Netherlands have the strongest government responses to modern slavery.

The Walk Free Foundation estimates that on any given day in 2021, 50 million people were living in situations of modern slavery. Of this estimate, approximately 28 million people were in forced labour and 22 million people were in forced marriages. This global estimate has worsened since 2018 with a marked increase of 10 million in the men, women, and children forced to work against their will or in a forced marriage. Australia has an annual value of at-risk imported products which are connected to modern slavery, of USD7.4 billion. These at-risk imported products include textiles, garments, solar panels, cocoa and fish.

Within the Act, modern slavery is defined to encompass eight severe forms of exploitation, which are as follows:

- Trafficking in persons
- Slavery
- Servitude
- Forced marriage
- Forced labour
- Debt Bondage
- Child labour
- Deceptive recruiting for labour or services.

These forms of exploitation are deemed serious violations of human rights and are comprehensively addressed within the Act to combat modern slavery.

Ausenco is dedicated to upholding our responsibilities under the *Modern Slavery Act 2018* (Cth) and recognises the critical importance of protecting human rights. Our foremost priority is safeguarding the rights of all individuals, including our employees, clients, and those within our supply chains. We are committed to conducting our business with the highest ethical standards. Our initiatives aim to identify and address occurrences of modern slavery within our operations and supply chains, ensuring the respect and preservation of human rights. We are committed to creating a work environment free from modern slavery and are actively working towards achieving this objective.

1.1 Reporting Entity

This is Ausenco's fifth year of reporting under the Act. This joint statement is made in respect of Ausenco Pty Ltd (ACN 114 541 114), and its related bodies corporate set out in Appendix 1, for the financial year 30 June 2023 to 30 June 2024. This statement was approved by the Board of Directors and the Ausenco Audit and Risk Management Committee (ARMC) in their capacity as the principal governing body of Ausenco Pty Ltd on 26 June 2024. As of 2024, Ausenco's Canadian entities are also required to report under *Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C. 2023*.

1.2 Stakeholder Consultation

During the reporting period covered by this Statement, Ausenco engaged and consulted with its related bodies corporate outlined in Appendix 1 and internal stakeholders. The actions outlined in this Statement were implemented in consultation with Ausenco’s Legal Team, People and Performance Team, Procurement, and Vendor Team.

Ausenco commenced global business ethics training in May 2024 and expects to finalise this training this year. The training is mandatory for all personnel and provides the business with an overview of Ausenco’s legislative obligations with regard to the modern slavery legislation in Canada and Australia.

2. Our business structure and operations

Ausenco is a global engineering consulting company, with its headquarters located in Brisbane, Australia. We are a global company redefining what’s possible. Our team is based across 26 offices in 15 countries, with projects in over 80 locations worldwide. Combining our deep technical expertise with a 30-year track record, we deliver innovative, value-add consulting studies, project delivery, asset operations and maintenance solutions to the mining & metals, oil & gas and industrial sectors. We find a better way.

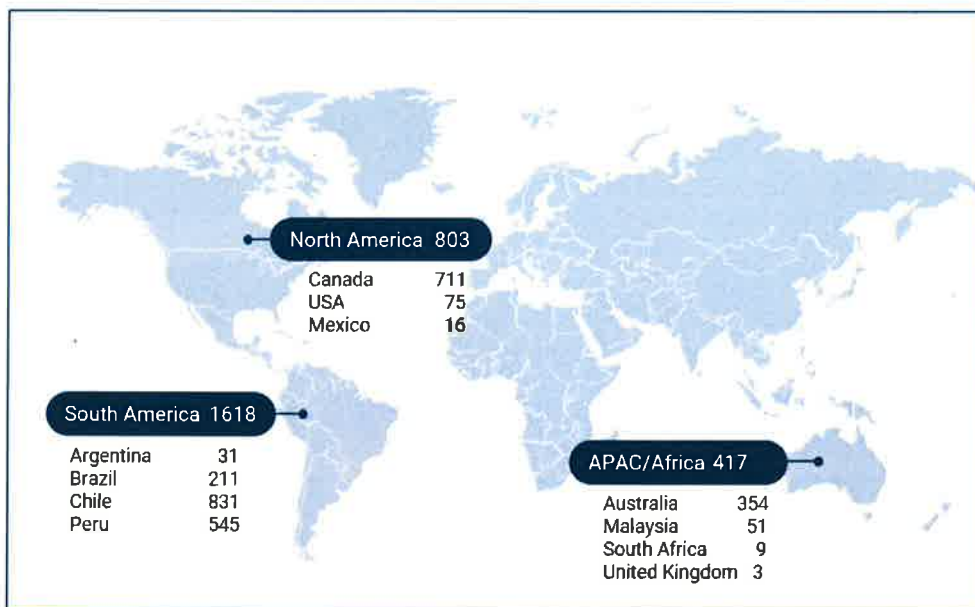


Figure 1.1 Highlights of People in various Ausenco offices around the world

Throughout our growth, our commitment to innovation continues. We are dedicated to finding ingenious solutions that create value for our clients - on every project. We are always looking to deliver practical solutions to complex problems – and sometimes that means pushing the boundaries of what has been done before.

We are also committed to having a positive impact on the world around us. Wherever we work, we strive to collaborate with clients and communities to achieve truly sustainable outcomes in health, safety, the environment, and community.

2.1 Our Values

Our core values are the cornerstone of everything we do. They enable us to discover through ingenuity and lead by example.

Safety in all we do

Regardless of where our people work across the globe, they deserve to be safe and feel safe. We let nothing compromise our safety performance and have safety initiatives in place to achieve our target of Zero Harm.

The client is our focus

We develop trusting and open relationships with our business partners and clients, ensuring we meet their needs and exceed their expectations. By delivering extraordinary results, we build their business and our own.

Our people are our strength

We value our people's ability, diversity, and creativity, and do all in our power to nurture their existing talents and develop new ones. The way we care for, grow and encourage our people is a key part of our culture, and is governed by our People Practices.



Respect the community and environment

Wherever we operate, we respect the diverse communities and environments and strive to achieve sustainable outcomes for all. Our footprint must engender a positive outlook for future generations, both abroad and at home.

We seek ingenious solutions

We encourage our people to continually expand their knowledge and experience to become life-long learners. By constantly striving to find the best solution, we foster innovation.

We are open, honest and collaborative

We respect the diversity and differences of our people, clients and the communities in which we live and work. We are straightforward and collaborative in all our communication.

3. Our Approach

3.1 Supply Chain Risks and Due Diligence

We continue to provide our Modern Slavery Questionnaire to our vendors during the vendor onboarding process. This Questionnaire serves as a crucial tool for assessing supply chain practices and identifying potential risks related to modern slavery.

We have collaborated closely with our Vendor Team to continue capturing vendor responses, enabling us to map our supply chain and identify modern slavery risks. By further integrating the Modern Slavery Questionnaire into our Vendor Request Workflow, we have enhanced support for the Vendor Team and the business, ensuring vendors complete the Questionnaire. Additionally, we have communicated the importance of completing the Modern Slavery Questionnaire to the business, emphasising its critical role in our efforts to combat modern slavery within our supply chains.

In May 2024, we implemented the Modern Slavery Questionnaire into our vendor onboarding process in our Canadian operations for new vendors and existing vendors. As of the date of this Statement, Ausenco has continued to collect responses from our existing vendors and expects that responses will improve over the next few months. In this Statement, we have included key insights from the responses received from our Canadian and Australian operations.

The following are the key findings revealed by their responses:

- **Geographical Distribution:** Among the vendors who completed the Questionnaire, 38% were located in Australia, and 44% were located in Canada. Other vendors based overseas were located in the United States of America, the United Kingdom, and Singapore.
- **Service Composition:** Of the vendors who responded to the Questionnaire, 54% provided professional or technical services. Most of these respondents offered engineering consulting, financial consulting, human resources consulting, and education and training services. Additionally, 13% of respondents provided administrative support, waste management, and remediation services. Vendors offering hospitality services, including catering and entertainment, comprised 6% of the total. Another 13% of respondents supplied information technology (software) and were industry associations.
- **Implementation of policies and processes:** Of the respondents, 32% indicated that their business had policies addressing modern slavery. A significant portion of the vendors stated that their approach to addressing an allegation of modern slavery would involve conducting thorough investigations, escalating matters to the board and senior executives, reporting the incident to authorities, and reviewing and terminating contracts with suppliers. Most vendors indicated they were not required to report under the Act.
- **Employee Awareness:** The majority of respondents reported that employee training on modern slavery risks was not currently implemented in their business practices. However, many vendors indicated that they had only a few employees or were sole traders, or they planned to introduce employee training on modern slavery risks in the near future.
- **Supply Chain Visibility:** When asked about visibility in their supply chain, 37% of Australian respondents indicated having 'high visibility,' while 18% reported having 'moderate visibility.' Meanwhile, 24% reported having 'developing visibility,' meaning they had identified major Tier One suppliers but had limited visibility beyond that level. Additionally, 26% of respondents were conducting supply chain due diligence in their organisation.

During our assessment, we identified certain industries that present a higher risk of modern slavery, including food and beverage and hospitality. The geographical distribution of vendors indicated that most are located in countries where we operate. According to metrics provided by the Walk Free Foundation, the countries with the highest prevalence of modern slavery are North Korea, Eritrea, Mauritania, Saudi Arabia, and Turkey. Notably, our vendors are located in areas of lower risk, not among the top 10 countries for the highest prevalence of modern slavery. However, as we expand our operations and provide services to clients in countries within the top 10 for modern slavery prevalence, we recognise the need to continue acting ethically. This will involve examining and further implementing our modern slavery risk management activities within a project execution framework.

By undertaking the due diligence process and continuing to map our supply chain, we have gained valuable insights into the locations of our vendors and the services they provide. Our ongoing reporting under the Act reveals a clear trend: we predominantly engage vendors in the professional services sector, particularly professional consultants and engineering companies. It is important to note that our primary service offering and those of our vendors, engineering consulting, falls within the lower-risk category concerning modern slavery risk. Many respondents indicated they were sole traders or small businesses and were not required to report under the Act.

There were also notable improvements in the responses from vendors to the Questionnaire. Many vendors indicated that they were either planning to report voluntarily or had plans to do so. Additionally, many respondents were developing supply chain due diligence processes, employee training, and modern slavery policies and would take any occurrence of modern slavery in their supply chain very seriously.

These findings provide valuable insights into the composition, visibility, and risk mitigation efforts of our new vendors during the reporting period. We will use this information to further strengthen our supplier management processes and ensure responsible practices are upheld throughout our supply chains. Ausenco expects a greater number of new vendors to be assessed in the next reporting period as more responses are received from the Canadian operations and as the supplier risk evaluation is implemented further internationally. By recognising the varying risks associated with different industries and product categories, we can prioritise our efforts to address modern slavery and focus on engaging with vendors in higher-risk sectors.

3.2 Remediation

Workplace Relations

As a company operating in multiple countries, we have a diverse workforce, and we highly value this diversity. We recognise that diversity brings organisational strength and opportunities for innovation. Therefore, we are deeply committed to fostering a working environment that is free from discrimination, where individuals can collaborate in a productive and professional manner.

Ensuring a discrimination-free workplace is the responsibility of all our personnel, including employees, contractors, and consultants. We consider any form of discrimination a serious matter and will neither condone nor tolerate it within our organisation. We have multiple employee organisations that underscore our commitment to a discrimination-free workplace, diversity and inclusion, including Pride@Ausenco, Women@Ausenco, and D&I Committee:

- Pride@Ausenco is dedicated to empowering LGBTQ+ inclusion and celebrating diversity. We are committed to fostering an inclusive environment where every employee, regardless of their individual expression, feels respected, valued, and empowered to thrive both personally and professionally.
- Women@Ausenco supports women in networking and mentoring opportunities to enhance professional success. It amplifies the profile of women at Ausenco to foster diversity and inclusiveness.

Our Diversity and Inclusion policy describes how we actively promote diversity in our workforce. At Ausenco, diversity includes the level of education, skills and training, religion, race, ethnicity, language, gender, sexual orientation, disability, age, and all other types of diversity. Our global Fair Treatment Policy ensures that in all our business activities, people operate in an environment that is free from bullying, discrimination, and harassment.

To address any concerns related to labor practices or workplace grievances, we have established remediation processes throughout our operations. Our personnel have the right to raise such concerns with their line manager, the People & Performance team, the management teams, or through our Anonymous Whistleblower Alertline.

We have clearly defined processes for escalating issues, which are outlined in our employment procedures and policies. These procedures and policies are shared with all new employees and are readily accessible through our internal document management system. By having these robust processes in place, we aim to ensure that any concerns or grievances are promptly and effectively addressed, maintaining a fair and respectful working environment for all.

Dispute Resolution

Our standard contracts include provisions for dispute resolution, allowing suppliers to raise concerns and escalate issues to our personnel and management. These contracts also mandate that suppliers adhere to our Modern Slavery Policy and all applicable laws. Non-compliance with the Policy may lead to termination of the agreement.

During this reporting period, we have introduced additional amendments to our standard contracts in our Canadian operations, ensuring vendors comply with Modern Slavery legislation, including the Canadian Supply Chain Act. In Canada, the majority of our suppliers are subconsultants and independent contractors who provide either project-specific services or work with us continuously. The amendments to our standard subconsultant and independent contractor agreements include clauses to ensure:

- The supplier's personnel do not engage in modern slavery activities;
- Compliance with all applicable the Act and Ausenco's Policy;
- The supplier establishes and implements the Act, policies and procedures (including training), if applicable to that entity;
- The supplier has similar protections in place with its own suppliers;
- The supplier will provide Ausenco with its assistance in investigating any occurrence of a breach of the Act;
- Termination of the agreement (purchase order or contractual document) with the supplier if the supplier fails to comply with the Policy or is found guilty of contravening the Act.

Ausenco's Whistleblower Protection Policy and Alertline

Ausenco's Whistleblower Protection Policy is readily accessible on our website and internal document management system, available to all personnel, subcontractors, and consultants within our organisation. As mentioned previously, we are currently finalising our global business ethics awareness training. This annual training includes comprehensive instruction on the Whistleblower Protection Policy and the use of the "Alertline."

To facilitate anonymous reporting of issues, the Whistleblower "Alertline" is globally accessible to all personnel. This confidential reporting channel allows individuals to report any violations of our policies, including potential modern slavery risks in our business operations. The primary objectives of Ausenco's Whistleblower Protection Policy are as follows:

- Encourage the prevention of wrongdoing and promote ethical behavior within our organisation.
- Outline the legal protections available under Australia's statutory whistleblower protection regime for individuals reporting actual or suspected wrongdoing.
- Establish clear guidelines on how we handle and investigate disclosures made by whistleblowers regarding actual or suspected wrongdoing.

We fully support and encourage individuals to report any violations, and to date, there have been no reported instances of modern slavery through the Alertline or to management. We remain committed to maintaining a transparent and accountable environment where individuals feel empowered to raise concerns without fear of retaliation.

3.2.1 Employee Awareness

We prioritise educating our employees about modern slavery and its potential presence in Ausenco's supply chains. Our annual business ethics training, conducted both in person and virtually, ensures widespread participation. Global business ethics training commenced in May 2024 and is expected to conclude by the end of this year. This training is mandatory for all personnel and provides an overview of our legislative obligations under modern slavery laws in Canada and Australia. It educates personnel on what modern slavery entails and how to identify risks within supply chains. The training also outlines procedures for escalating and reporting concerns related to modern slavery and other issues through our Anonymous Whistleblower Alertline.

During this reporting period, in the APAC Africa region, 267 personnel attended in-person and online sessions, while in South America, 578 personnel participated in similar sessions. Ethics training will continue globally throughout the year, with recordings available to all personnel on our internal intranet. By implementing these training initiatives and ensuring essential resources are easily accessible, we aim to empower our employees with the knowledge and tools needed to identify and address modern slavery risks in our operations and supply chains.

4. The road ahead

Ausenco is fully committed to continuously further improving and expanding our approach to identifying and managing modern slavery risks within our operations and supply chains.

Looking forward, Ausenco will be implementing the following actions to strengthen our response:

- Aligning procurement and vendor registration processes across different regions and business lines.
- Continuing to review our Vendor Onboarding processes, existing policies and project documentation.
- Conducting supply chain risk reviews using Modern Slavery Questionnaires in multiple jurisdictions.
- Continuation of supplier risk assessment and due diligence activities: We will persist in conducting thorough assessments of our suppliers' risks and implementing due diligence measures. These activities aim to enhance our understanding of modern slavery risks within our supply chains.
- Ongoing employee awareness training including annual business ethics training.

Ausenco remains dedicated to upholding ethical standards and making continuous improvements in our efforts to combat modern slavery.

Appendix 1

Ausenco Entity	Location
Vector Argentina SA	Argentina
Ausenco Management Pty Ltd	Australia
Ausenco Operations Pty Ltd	Australia
Ausenco Services Pty Ltd	Australia
Ausenco Rylson Pty Ltd	Australia
Ausenco Projects Australia Pty Ltd	Australia
Ausenco Rylson Asset Optimisation Pty Ltd	Australia
Ausenco International Pty Ltd	Australia (Mexico branch)
Ausenco do Brasil Engenharia Ltda.	Brazil
Ausenco Engineering Canada ULC	Canada
Ausenco Sustainability ULC	Canada
Ausenco Chile Limitada	Chile
Ausenco Peru S.R.L	Peru
Ausenco Engineering USA South Inc	USA
Ausenco PSI LLC	USA
Ausenco Mexico S. De R.L. De C.V	Mexico

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of Ausenco Pty Ltd as defined by the *Modern Slavery Act 2018 (Cth)*¹ ("the Act") on 26 June 2024.

Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of Ausenco's Audit and Risk Committee as defined by the Act²:

Rod Baxter
Non-executive Director and Chair of the Ausenco Audit and Risk Committee

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
a) Identify the reporting entity.	10
b) Describe the reporting entity's structure, operations and supply chains.	3
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.	6
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.	6
e) Describe how the reporting entity assesses the effectiveness of these actions.	6
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). *	3
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	

* 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.

- 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.
- 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.



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every day.

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