



MODERN SLAVERY STATEMENT 2020



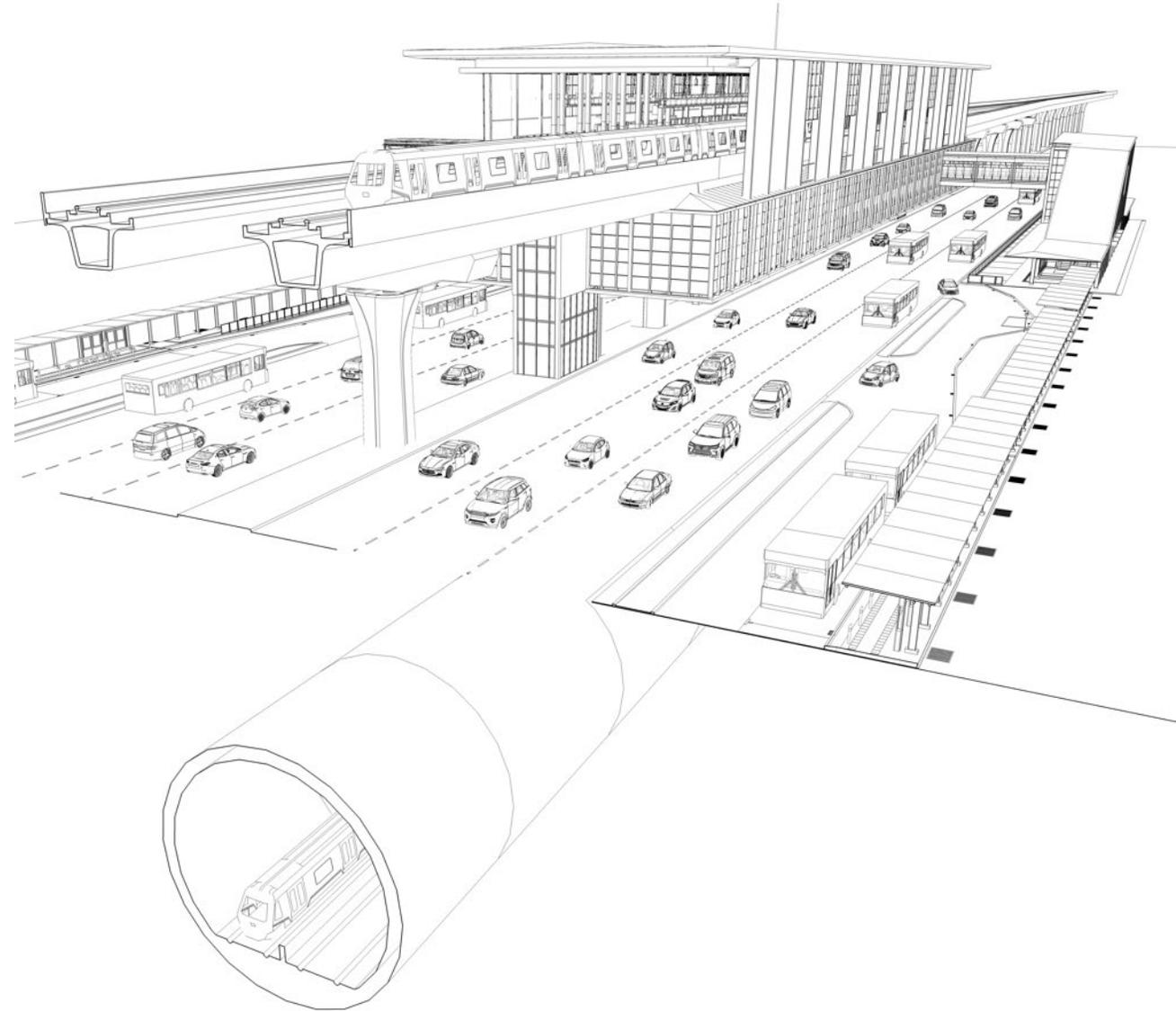
Contents

Introduction	3
Organisational structure, operations and supply chain	4
Potential risks in our operations and supply chains	5
Addressing the risk of modern slavery practices: policy and governance	9
Addressing the risk of modern slavery practices: collaboration and assessing effectiveness	11
Future commitments	12

ISSUE DATE: 29..1.2021

REVISION NO: 01

WHEN PRINTED THIS DOCUMENT IS AN UNCONTROLLED VERSION AND SHOULD BE CHECKED AGAINST THE ELECTRONIC VERSION FOR VALIDITY





Introduction

Access to fair and safe working conditions is a basic human right which promotes a sustainable life for all workers. As an employer, Gamuda Australia follows the *United Nations Guiding Principles*, taking responsibility for protecting the human rights of our employees and stakeholders.

At Gamuda Australia, all business is conducted according to ethical, professional, and legislative standards in a fair, honest and open manner. We continuously look to implement and enforce effective systems and controls to fully comply with the Modern Slavery Bill 2018, in relation to all business activities.

Slavery and human trafficking can occur in many forms, including slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

The purpose of this statement is to outline Gamuda Australia's approach to ensuring that appropriate frameworks and processes are in place to mitigate potential risks of modern slavery in our operations and supply chain.

Covered entities

In compliance with the Modern Slavery Act 2018, the reporting entities covered by this Modern Slavery Statement are Gamuda (Australia) Branch ABN 27 632 738 768 and Gamuda Engineering Australia ABN 36 636 433 522, otherwise referred to as 'Gamuda Australia', 'our' and 'we'.

This statement applies to Gamuda Australia's operations within Australia.



Organisational structure, operations and supply chain

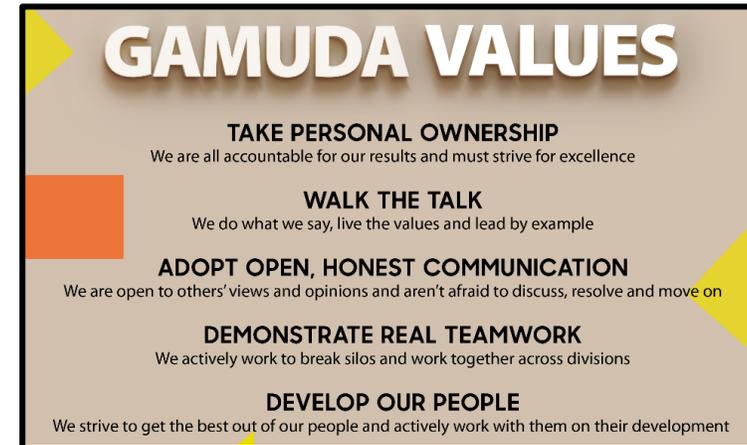
Organisational Structure and Operation

Gamuda Australia was established in 2019 and focuses on the core business of infrastructure design, construction, operation, and maintenance. Areas in which we operate include roads, bridges, tunnelling, rail, dams and airports.

Our vision is to become a leader in the Australian Infrastructure and construction sector by offering innovative, breakthrough and dependable solutions for large scale public infrastructure projects and private investment opportunities.

Our strength lies in our ability to identify, innovate, and deliver breakthrough engineering solutions to improve the standard of living for the communities in which we operate.

At the close of the FY20 reporting period, Gamuda Australia had a total headcount of 29 comprising of included 21 full time employees, 2 part time employees and 6 contractors across our offices in Sydney and Perth.



Supply Chain

In FY20 Gamuda Australia engaged with over 120 suppliers, all of which were located within Australia. The key goods and services that were procured by Gamuda Australia in FY20 included:

- Specialist Consultants e.g., design, environmental and sustainability
- Professional Services e.g., legal, commercial property management
- Technology services and hardware suppliers



Potential risks in our operations and supply chains

Globally, it is estimated that 18% of modern slavery victims are found in the construction industry.

This is comparatively high compared to other industries, due to the high demand for low-skilled labour, poor visibility over supply chains and suppliers operating in high-risk geographies.

As Gamuda Australia continues to grow within the Australian market, the potential exposure to Modern Slavery within our operations and supply chain will increase, meaning we must identify potential risks from the outset, ensuring we have the right frameworks implemented to continue to mitigate all forms of modern slavery.

Operational risks

Acknowledging that modern slavery comes in many different forms, our responsibility as an employer is to identify and mitigate any potential slavery risks within our own industry and business operations, regardless of the level of severity.

Modern slavery practices which have been highlighted as having 'high risk' potential within the construction industry include: forced or unpaid work; unsafe working conditions; bonded or child labour; inadequate accommodation; passport confiscation; and human trafficking.

It has also been cited that workers who are employed on temporary visas in Australia are particularly vulnerable to modern slavery practices, including foreign workers, international students and working holiday visitors.

Internally, Gamuda Australia has strong Human Resources processes to ensure our business is operating and engaging with our employees in a way that protects their human rights.

As part of our recruitment process, employment checks are conducted to ensure that staff members have a valid residency status. An example of how we do this is to check all temporary workers visa conditions through the Visa Entitlement Verification Online system (VEVO).

Our onboarding process ensures all new starters read, understand, and acknowledge all company policies and complete all necessary inductions, including Workplace Health and Safety, which outlines the minimum expectations of how they are to operate within the workplace.

At the close of FY20, Gamuda Australia's workforce was entirely white collar and operated out of our head office in Sydney and our support office in Perth. We therefore categorised the risk of modern slavery practices within our operations as low during the FY20 period.



Potential risks in our operations and supply chains (cont.)

Potential risks to supply chain

Gamuda Australia works collaboratively with its suppliers to ensure there are no cases of modern slavery within our supply chain.

There are several factors that affect the risk level of modern slavery within a supply chain. Two factors that have been identified and explored within our supply chain are the sectors in which products/services are procured, and the geographical location of the suppliers.

During FY20, we assessed some key risks associated within the different sectors and geographic locations in which we procure goods and services, whilst also assessing some sectors and geographic locations in which we will procure goods/services in the future.

Sector risk

We conducted a desktop assessment of our current supply chain, as well as sectors in which we will engage with in the future, reviewing the key types of modern slavery associated with each. The findings are outlined in the table shown here (right).

It is widely acknowledged the procurement of raw materials from overseas poses an elevated risk of modern slavery practices, with around 22% of forced labour victims found in the manufacturing of raw materials.

Procuring materials and imported goods from overseas often involve complex supply chains and multiple layers across contractors and sub-contractors, which can result poor visibility for construction companies over modern slavery risks.

Sector	Example Service or product	Potential Risks Identified
Bulk Materials	Quarrying, Concrete, Steel etc.	<ul style="list-style-type: none"> Forced/Compulsory labour Human Trafficking Child labour
Service Provider	Labour hire	<ul style="list-style-type: none"> Wages, penalties and working hours Forced/Compulsory labour Child labour
Transportation	Transportation of plant/heavy machinery	<ul style="list-style-type: none"> Human Trafficking Forced/Compulsory labour Child labour
Plant, Equipment and Machinery	Raw materials and manufacturing	<ul style="list-style-type: none"> Forced/Compulsory labour Human Trafficking Child labour Wages and working hours
Technology	Electronic devices, laptops etc.	<ul style="list-style-type: none"> Forced/Compulsory labour Child labour Wages and working hours.



Potential risks in our operations and supply chains (cont.)

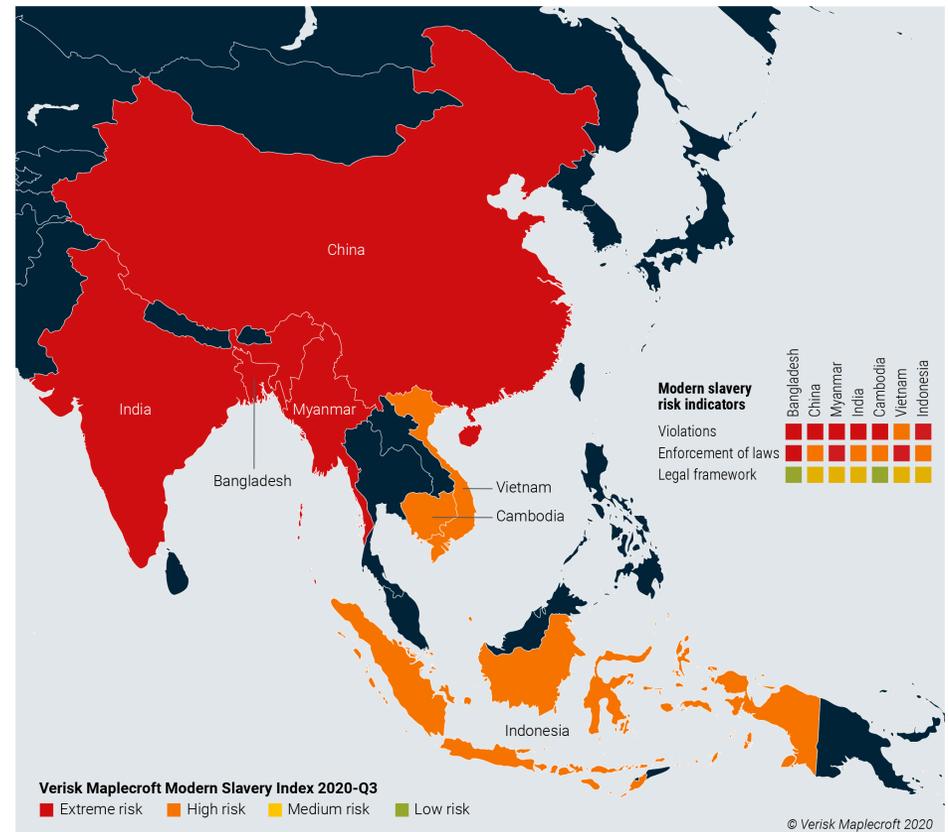
Geographical risk

Although Gamuda Australia’s direct supply chain was located entirely within Australia during FY20, we recognise our suppliers have their own complex supply chains which may span over multiple countries.

According to the Verisk Maplecroft Modern Slavery Index, countries in which retail goods and raw materials are produced are high-risk areas when measuring the presence of Modern Slavery.

One potential geographic risk that was identified within Gamuda Australia’s indirect supply chain is within the procurement of electronic devices. A large percentage of electronic devices are imported from Asia, which has seen a significant increase in Modern Slavery over the last few years. Countries such as China, India and Cambodia are classified as ‘High Risk’ areas as seen the graph below.

Overall, the assessed level of risk of modern slavery within our direct supply chain was low during FY20, due to the types of goods/services that were procured, combined with the geography of where they were procured from.





Potential risks in our operations and supply chains (cont.)

Covid-19

According to BIS Oxford Economics, the construction industry expects significant growth in Australia, despite the effect that COVID-19 pandemic is currently having.

This increased volume of work increases the demand for a base-skill workforce who are vulnerable to exploitative practices.

As infrastructure construction activity continues to ramp up post-COVID-19, the vulnerability and risks associated of these worker groups will be intensified, as people will continue to work, despite the potential poor working conditions that they may be exposed to.

In addition to this, the introduction of global travel restrictions has made it more difficult for businesses to audit their suppliers working practices and conditions, increasing the potential risk of enabling Modern Slavery within their supply chains.





Addressing the risk of modern slavery practices: policy and governance

As Gamuda Australia continues to establish itself and grow during FY21, the opportunity for potential risks of modern slavery to appear within our operations and supply chain will increase. As such, it is extremely important we continue to establish and improve our processes continuously.

Policy and governance

As part of Gamuda Australia's zero-tolerance approach to any form of slavery, we are committed to:

- Creating a safe working environment for all employees and contractors.
- Adhering to all employment legislation, agreements, awards, codes, and regulations that protect the working rights for all employees and workers.
- Providing training for our employees and workers on recognising modern slavery and human trafficking practices and explaining the steps they should take if they have a legitimate concern.

To ensure we have the right frameworks in place to combat Modern Slavery, we have implemented formal policies and procedures to promote legal and ethically compliant business conduct and prevent violations of human rights.

This is demonstrated within our **Company Code of Conduct**, which is issued to and acknowledged by all staff members. The document clearly outlines what we expect from our employees in order to conduct business in a way that promotes and protects the human rights of our people.

Additional key supporting policies that build on our Company Code of Conduct include the **Modern Slavery** and **Whistleblower** Policies.



Addressing the risk of modern slavery practices: policy and governance

Modern slavery policy

To raise awareness of Modern Slavery and its potential risk within workplaces, Gamuda Australia implemented a Modern Slavery policy into our suite of key policies.

This policy: outlines the different ways in which Modern Slavery can be present within an organisation; provides guidance on what to do if an employee or contractor discovers a potential case of Modern Slavery; and outlines what Gamuda Australia are doing to combat Modern Slavery in the workplace.

Remediation

We encourage the reporting of all genuine concerns of malpractice or misconduct in the workplace. We do this by providing an accessible and safe reporting mechanism, and protecting people who make disclosures of serious wrongdoing. This includes unlawful, unethical, fraudulent, or undesirable conduct related to Gamuda Australia.

As such, a comprehensive **Whistleblower Policy** is in place to ensure there is a clear process for reporting malpractice or misconduct within the workplace.

This policy gives our employees and contractors guidance on how and where to report concerns of malpractice. Once a concern is reported through the appropriate channel, we acknowledge and investigate the concern appropriately.

Should the investigation sustain the concern raised, remedial action will be taken, the reporter will be advised, and all relevant information and outcomes will be documented.

To protect all whistleblowers, our policy prohibits any form of retaliation or negative impact towards anyone who reports a concern or participates in an investigation.

During FY20, there were no reports or concerns raised relating to modern slavery or human trafficking.



Addressing the risk of modern slavery practices: collaboration and assessing effectiveness

Collaboration

Since 2019 Gamuda Australia is an active member of the Infrastructure Sustainability Council of Australia (ISCA).

ISCA is a member-based, not-for-profit peak body operating in Australia and New Zealand with the purpose of enabling sustainability outcomes in infrastructure.

ISCA aims to ensure all infrastructure activities deliver cultural, social, environmental and economic benefits. By contributing to, and supporting ISCA's vision, we aim to minimise the risks and impacts of Modern Slavery in all forms.

In FY21, we will continue to expand our network and collaborate with other agencies and associations alike to continue the fight against Modern Slavery.

Assessing effectiveness

Gamuda Australia continuously assesses and looks to improve its operations and supply chain to ensure all forms of modern slavery aren't present in the workplace.

Key ways in which we assess the effectiveness of our Modern Slavery measures include:

- Regularly reviewing and assessing business processes against the governance frameworks that have been implemented to combat Modern Slavery in the workplace;
- Identifying and collaborating with industry experts to assess and share knowledge the key issues, trends and causes of Modern Slavery;
- Monitoring the channels in which malpractice can be reported to spot any trends that could relate to Modern Slavery.



Future commitments

Our commitment to abolishing Modern Slavery is ever present and as such, we must take a continuous improvement approach to tackling it.

Therefore, key actions have been identified and will be initiated during FY21, which include:

- Continuous review and update of our suite of risk-related policies and governance control measures;
- Delivery of appropriate awareness training on modern slavery principles to Gamuda Australia employees and contractors;
- Increasing and adopting due diligence activities across our operations and supply chain to ensure that we are minimising all potential Modern Slavery risks;
- Implementing anti-slavery wording into supplier agreements.

This statement was approved by the Gamuda Australia Board of Directors on 8 March 2021.



Yee Yew Weng

Executive Director - Gamuda Australia



Gamuda Australia

100 Miller Street, North Sydney NSW 2060, Australia

info@gamuda.com.au

+61 2 9170 9200

gamuda.com.au