

RPS AAP REPORTING ENTITIES

MODERN SLAVERY JOINT STATEMENT



Reporting period 1 January to 31 December 2020
August 2021



ACKNOWLEDGEMENT OF COUNTRY

In the spirit of reconciliation, RPS acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present.

OUR PURPOSE

We create shared value by solving problems that matter to a complex, urbanising and resource-scarce world.

OUR PROMISE

We have deep expertise in things that matter and we are easy to work with. Our clients trust us and we are respected for our creative thinking. Together we build strong relationships by repeatedly delivering on our promise.

OUR BEHAVIOURS



MESSAGE FROM ROSS THOMPSON

The importance of the *Modern Slavery Act 2018 (Cth)* to combat the unethical treatment of individuals and protect human rights cannot be underestimated.

RPS and its reporting entities do not tolerate any form of modern slavery and are committed to doing our part to meet Target 8.7 of the United Nations Sustainable Develop Goals.

This Modern Slavery Statement provides details of the measures RPS reporting entities have implemented, and expect to implement in the next reporting period, to ensure the risks of modern slavery in our operations and supply chain are identified and controlled.

This Modern Slavery Statement has been approved by the Board of Directors for each of the RPS reporting entities.



A handwritten signature in black ink, appearing to be 'Ross Thompson', written over a horizontal dotted line.

Ross Thompson
Chief Executive Officer
Australia Asia Pacific

CRITERIA 1 AND 2

Reporting entity, structure, operations and supply chains

Founded in 1970, RPS is a leading global professional services firm of 5,000 consultants and service providers. With experience across 125 countries and six continents, we define, design and manage projects that create shared value for a complex, urbanising and resource-scarce world.

RPS delivers a broad range of services in six sectors: property, energy, transport, water, defence and government services and resources. Services provided across RPS' six sectors cover twelve service clusters: project and program management, design and development, water services, environment, advisory and management consulting, exploration and development, planning and approvals, health, safety and risk, oceans and coastal, laboratories, training and communication and creative services.

In Australia and New Zealand, our business is made up of four divisions – Place & Environment, Advisory, Project Management and Energy. Within these divisions are a number of teams that deliver services to local communities in capital cities and regional areas.

CRITERIA 1 AND 2 (cont'd)

Reporting entity, structure, operations and supply chains

This Modern Slavery Statement is a joint statement made under the *Modern Slavery Act 2018 (Cth)* for the financial year ending 31 December 2020 and is submitted on behalf of the following entities (collectively referred to throughout this Joint Modern Slavery Statement as the “RPS reporting entities”):

| Entity | ABN | ACN |
|--|----------------|-------------|
| RPS Consultants Pty Ltd (parent company) | 55 108 734 407 | 107 734 407 |
| RPS AAP Consulting Pty Ltd | 97 117 883 173 | 117 883 173 |
| RPS Advisory Services Pty Ltd | 75 121 581 011 | 121 581 011 |
| RPS Australia East Pty Ltd | 44 140 292 762 | 140 292 762 |
| RPS Australia West Pty Ltd | 42 107 962 872 | 107 962 872 |
| RPS Manidis Roberts Pty Ltd | 42 003 550 972 | 003 550 972 |
| RPS Energy Pty Ltd | 44 072 504 299 | 072 504 299 |

RPS' business operations include:

- The direct employment of workers, primarily in professional services roles.
- Sub-contracting to entities and individuals to provide goods or professional services in support of our work.
- Procurement of operational goods and services including:
 - Office property occupancy, office consumables, security, cleaning, maintenance and waste management
 - Hardware, software, information technology and cyber security services
 - Telephone, internet and office equipment
 - Travel, logistics, courier, transportation, hospitality and motor vehicles (including rental and leased vehicles)
 - Tax, legal and other accounting
 - Bank, payroll, insurances and financial

CRITERIA 3

Risks of modern slavery practices in the operations and supply chains of RPS reporting entities

During the reporting period, RPS reviewed its operations and supply chain practices, including existing policies, procedures and legislative requirements, and took a risk-based approach to implementing measures that addressed the key areas of risk identified.

Through this review, RPS identified that there is a low risk of modern slavery in our operations due to:

- RPS being a professional services company, and not requiring a large or complex supply chain to support activities.
- Rarely relying on overseas outsourcing to deliver our services, and if we do, confirming the supplier is operating ethically.
- Australia's strong labour and other laws.
- RPS' strong ongoing legislative compliance.
- RPS' commitment to a fundamental respect for human rights.

Resulting from the review, a number of measures were identified to be implemented, which would provide further risk control and assurance.

CRITERIA 4

Actions taken by RPS reporting entities to assess and address these risks, including due diligence and remediation processes

Development of an RPS AAP Modern Slavery Policy

In July 2020 RPS reporting entities developed and issued a *Modern Slavery Policy*. As per the normal process for development of policies, the policy was communicated to all staff. The policy was also included in the RPS new start induction suite. The *Modern Slavery Policy* reiterates RPS' commitment to operating our business lawfully and ethically, and expects employees and suppliers to share this commitment.

RPS AAP Shared Value Framework – Equality and Inclusiveness Pillar

In 2020 RPS launched a Shared Value Framework and pillars, which provides guidance for our corporate social responsibility principles and actions in Australia Asia Pacific. These are aligned with the UN Sustainable Development Goals (SDG) Framework.

Our Equality and Inclusiveness pillar encompasses the notion of creating social value, reducing inequality, fostering good health and wellbeing, while promoting peace, justice and strong institutions.

CRITERIA 4 (CONT'D)

Actions taken by RPS reporting entities to assess and address these risks, including due diligence and remediation processes

Improvements to the Supplier Management Program

RPS' procedure for supplier management outlines the requirements we set in relation to the prequalification, engagement and evaluation of suppliers. All suppliers are required to complete a prequalification form providing certain disclosures and supporting documentation. The prequalification is then reviewed for compliance with RPS' requirements and if adequate, the supplier is added to the RPS Supplier Register and given an "Approved" rating. Suppliers are reviewed periodically after project engagements and are also required to complete a thorough bi-annual review.

During the reporting period the supplier management framework was reviewed and revised as below:

- RPS' Supplier HSSEQ Standards document was replaced with a Supplier Code of Conduct that requires all suppliers to read and acknowledge. The code of conduct includes a section on human rights and modern slavery.
- Our prequalification process was amended to require suppliers to disclose any regulatory attention or prosecution relating to modern slavery or labour laws, and also confirm they have read and understand the Supplier Code of Conduct.

CRITERIA 4 (CONT'D)

Actions taken by RPS reporting entities to assess and address these risks, including due diligence and remediation processes

EXISTING CONTROLS

RPS Whistle-Blower Policy

Implemented in January 2019, RPS' *Whistle-Blower Policy* empowers and encourages employees to raise concerns about improper conduct in a confidential manner and on an anonymous basis.

Disclosures made under the policy will be investigated in a timely, thorough, confidential, objective and impartial manner, recognising the principles of natural justice and best practice investigative techniques. Where possible, complainants will be provided with feedback regarding the outcome of the investigation.

ONGOING AND PLANNED ACTIVITIES FOR 2021 and 2022

- Development of an Australia Asia Pacific *Sustainable and Ethical Procurement Policy*
- Review of contract documentation
- Modern slavery and human rights awareness to be incorporated in an RPS annual refresher training package.

CRITERIA 5

Assessment of the effectiveness of actions being taken to assess and address modern slavery risks

RPS assesses the effectiveness of actions and processes implemented to address risks, including modern slavery through governance and monitoring activities, including:

- Legal compliance reviews
- Audits and reviews of RPS policies, procedures and ISO certifications (ISO 9001, ISO 45001, ISO 14001)
- Audits, reviews and evaluations of RPS suppliers
- Investigation of incidents and complaints (including via the whistle-blower process, health, safety, environment, people, suppliers).
- Board reporting
- Mandatory reporting and disclosures
- Induction and training activities.

During the reporting period no actual or suspected instances of modern slavery were identified by, or reported to, the RPS reporting entities.

CRITERIA 6

Consultation process with RPS reporting entities

RPS has consulted and worked with a number of key stakeholders across the reporting entities in relation to:

- The development of this Joint Modern Slavery Statement
- Implementing the measures outlined in Criteria 4
- Seeking to identify further actions to address modern slavery requirements.

Within our Shared Value Framework and pillars, employee representatives from all reporting entities participate in working groups to identify and implement initiatives in key areas of importance, including modern slavery.

Each of our Shared Value Framework pillars is led by an Executive Sponsor.

CRITERIA 7

Any other relevant information

The directors of each of the RPS AAP reporting entities have reviewed and approved this Joint Modern Slavery Statement.

The RPS UK Modern Slavery Statement can be found on the [RPS website](#) and is also linked [here](#).