

Turner & Townsend Pty Ltd

Australian Modern Slavery Statement

2022



1.1 Introduction

Turner & Townsend Pty Ltd ACN 115 688 830 (**Turner & Townsend PL**) is a professional services company specialising in programme management, project management, cost management and consulting across the real estate, infrastructure and natural resources sectors. Turner & Townsend PL is part of an international group of companies operating in over 112 offices worldwide. Further information about Turner & Townsend PL's and the Turner & Townsend group's structure, functions and the markets within which we operate can be found at <http://www.turnerandtowntsend.com>.

Turner & Townsend PL's registered office address is: Level 13, 140 Creek Street, BRISBANE QLD 4000.

1.2 Purpose

The purpose of this statement is to outline Turner & Townsend PL's commitment to the elimination of modern slavery and our approach to comply with our obligations under the *Modern Slavery Act 2018* (Cth) ("the Act"). Turner & Townsend PL is the relevant reporting entity under the Act. Turner & Townsend PL adopts a robust approach to slavery and human trafficking, and we take a zero-tolerance approach to non-compliance with the Act within our company, our operations and supply chains. This statement applies to all Turner & Townsend PL's businesses operating within Australia and their associated supply chains. It is reviewed and amended for good practice, as appropriate. This statement has been published in June 2022 and outlines our planned activity for the financial year 2020/21.

This statement has been created in consultation with and reviewed by the board of directors of Turner & Townsend PL. Consultations with the board of directors have involved taking on board their views in identifying, assessing, and addressing modern slavery risks and actions that need to be taken.

1.3 Our policy

Turner & Townsend PL is committed to our business and supply chains being free of any practices of modern slavery and human trafficking. It is our expectation that our employees and our supply chains will respect this commitment and comply with relevant legislation. We are a business that upholds integrity and transparency in all our business dealings and our modern slavery prevention measures are no exception. Our policy and processes and any changes to them are communicated to those affected. We are committed to investigating any complaints about suspected human trafficking activity in relation to our business and will take prompt remedial action, where necessary.

1.4 Structure, operations & supply chains

1.4.1 Structure

Turner & Townsend PL is the Australian subsidiary of an international group of companies (**Turner & Townsend Group**) – see: <http://www.turnerandtowntsend.com>. Turner & Townsend PL is a subsidiary of the Turner & Townsend Group. The Turner & Townsend Group is a private group of companies operating on a partnership-type model with over 8,000 employees worldwide and operating in 45 countries. The Turner & Townsend Group operates in the UK, the Americas, Europe, Africa, the Middle East, Asia, Australia and New Zealand. In Australia we have over 700 employees and operate in Sydney, Perth, Brisbane, Adelaide, the

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Gold Coast, Melbourne, Darwin, Townsville, and Canberra. The global head office is in Leeds, UK.

On 1 November 2021, we formed a strategic partnership with CBRE Group, Inc, the world leading commercial real estate services and investment firm listed on the New York Stock Exchange. As part of this transaction, CBRE acquired an interest in 60% of the share capital of our group holding company, Turner & Townsend Holdings Limited. We will remain operationally independent under this new legal structure. There will be no change to our clients; in the way we operate, our commitment to service excellence, or the personal care we demonstrate.

1.4.2 Operations

We provide professional services and so our supply chain risks mostly arise from the personnel we engage to carry out those professional services and to support the performance of that work.

1.4.3 Supply chains

Our supply chains are comprised of our own direct employees, contractors, other service providers, and manufacturers of a variety of electrical and other products used in professional services.

1.4.4 Supply chains assessment

It is our expectation that our suppliers:

- Comply with the provisions of the Act;
- Adhere to our commitment to a zero-tolerance approach when it comes to any form of slavery or human trafficking;
- Take steps to prevent modern slavery within their business and supply chains;
- Pay at least the national minimum wage for Australia-based employees; and
- For non-Australia based locations, the wages of their employees meet applicable local standards.

Our financial teams and business management system teams record the suppliers we engage, comprised of short term and long term relationships. In addition, a list of potential suppliers, who can support our service delivery, if required by our clients, is available on a supplier database maintained by our operational teams. Turner & Townsend PL's supplier database provides a platform to evaluate supplier competence on a specific project/commission. These suppliers are required to submit information covering a wide range of topics relevant to management systems, internal policies, diversity etc.

A supplier pre-qualification questionnaire is required to be completed to assess the general capability of the supplier to provide services on projects to be undertaken for our clients. The supplier pre-qualification questionnaire addresses bribery and corruption, health and safety, personnel/consultants, areas of operation, services offered, and sector experience. A performance assessment is also conducted once a project/commission or other activity is completed. Our direct employment model means that we are largely able to conduct our own checks and that any areas of concern in the supply chains can be identified and audited.

1.5 Polices in relation to slavery and human trafficking

Our commitment that there is no modern slavery or human trafficking within our business or supply chains is underpinned by the following policies:

- Ethics and code of conduct policy;
- Anti-Bribery & Corruption policy;
- Grievance procedure; and
- Whistleblowing policy.

Our corporate responsibility strategy is underpinned by four pillars which include integrity in industry and community value, and it is aligned to the United Nations Sustainable Development goals, a voluntary initiative based on CEO commitments to implement universal sustainability principles.

In 2017, in addition to the internal processes the Turner & Townsend Group already had in place, an external anti-bribery and corruption hotline was also launched so that our workforce can raise concerns independently. Parties involved in our operations and supply chains who are identified as employees or contractors are also required to complete an annual anti-bribery and corruption declaration.

1.6 Risk assessment and management

Our services are generally delivered by our global workforce and as would be expected of a professional service organisation, our supply chains are relatively limited. On this basis, the risk of modern slavery and human trafficking within our recruitment, employment and associated supply chains are considered to be reasonably low although we are not complacent about this. We further mitigate this risk through the processes as described above.

As part of our commitment to reduce the risk of slavery and human trafficking we have carried out a risk assessment of our business and supply chains as follows:

- Country Risk: Low to High. Although we are based in Australia, the Turner & Townsend Group operates all over the world, including the UK, the Americas, Europe, Africa, the Middle East, Asia, and New Zealand. Our direct employment model means that the risks of slavery or trafficking are low.
- Sector Risk: The professional services industry in which we operate in is considered low risk.
- Transaction Risk: As we directly employ our workforce the transaction risks are low.

Our direct employment model provides control over the work undertaken and labour conditions under which our workforce operates.

Turner & Townsend PL checks whether its actions to assess its modern slavery risks are working by regularly reviewing policies and processes. We run regular audits on the supplier pre-qualification questionnaire to determine if mitigation measures have been consistently actioned. Turner & Townsend PL monitors any trends in cases reported through grievance mechanisms and how these cases were handled. Turner & Townsend PL uses a variety of

measures to work proactively with suppliers to ensure that relationships remain positive and productive, and ensure our expectations are clearly communicated.

1.7 Due Diligence

We have robust recruitment practices, including 'right to work' checks for all prospective employees and maintain a preferred supplier list of agencies that may source candidates on our behalf. This provides an assured overview of those entering our employment and minimises the occurrence of forced or involuntary labour.

Our employees are engaged on individual common law employment contracts, underpinned by the National Employment Standards and relevant Modern Awards contained in the *Fair Work Act 2009* (Cth). We are committed to complying with all requirements within the workplace relations framework within Australia according to the *Fair Work Act* and to providing our employees with a safe and equitable workplace in compliance with Health and Safety laws and regulations.

We have human resources representatives working with senior management so that:

- Recruitment practices are fair and equitable and in accordance with the relevant employment laws;
- Company standards, values, corporate behaviours and policies are being adhered to and satisfy working conditions;
- Relevant safeguards are in place; and
- Appropriate training is provided.

1.8 Remediation processes

A grievance mechanism and whistleblowing policy is in place for people to safely raise concerns regarding Turner & Townsend PL. Any grievances or complaints are received through either verbal or written communication that is reported to managers and/or HR confidentially. Complaints can also be received through Safecall, a global external whistleblowing service that focuses on establishing a safe and confidential reporting system to allow ethical transparency. Employees can contact the whistleblowing hotline as a safe and secure service to speak up and report issues that are unethical, unsafe or unlawful.

1.9 Workforce Training

Where relevant, we have/provide our staff with enhanced training when appointing contractors in higher-risk locations.

Further training will be given to staff as identified below.

1.9.1 Further steps

We have identified the following activities to further progress our commitment to the Act, we shall:

- Work with our significant suppliers to ensure that they are complying with the Act and thereafter will seek express annual confirmation of their compliance;

- Review our complaints and escalation procedures in respect of slavery and human trafficking in our supply chains and wider business, and publish this in future policy statements;
- Review and amend our standard terms and conditions for the appointment of Australian based contractors and subcontractors and include conditions covering our slavery and human trafficking supplier commitment;
- Set Key Performance Indicators covering the response rate for supplier surveys, percentage of suppliers with sustainability in commercial arrangements and the percentage of suppliers with a human rights policy or modern slavery statement; and
- Raise awareness – identify champions of the Act (recruiters, purchase ledger and key employees involved in the engagement of suppliers) to raise awareness across our global business so that they understand the impact of modern slavery and human trafficking and thus consider how they can make changes to minimise the risks, as appropriate.

This statement applies to Turner & Townsend Pty Ltd. It has been approved by the Board of Directors.



Anooj Oodit
Managing Director, Asia and ANZ

10 June 2022