

# SEDGMAN



## Combatting Forced Labour in the Canadian Supply Chain

**2023 Joint Statement**

**Reporting period: 1 January 2023 – 31 December 2023**

# Reporting Entities:

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## Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

This report was approved by the governing body of each entity included in the report, in accordance with section 11(4)(b)(i) of the Act.



**Grant Fraser**

Managing Director, Sedgman Pty Limited  
Director, Sedgman Canada Limited



**Daniel Pape**

Business Conduct Representative and  
General Counsel, Sedgman Pty Limited,  
Sedgman Canada Limited



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## SUMMARY

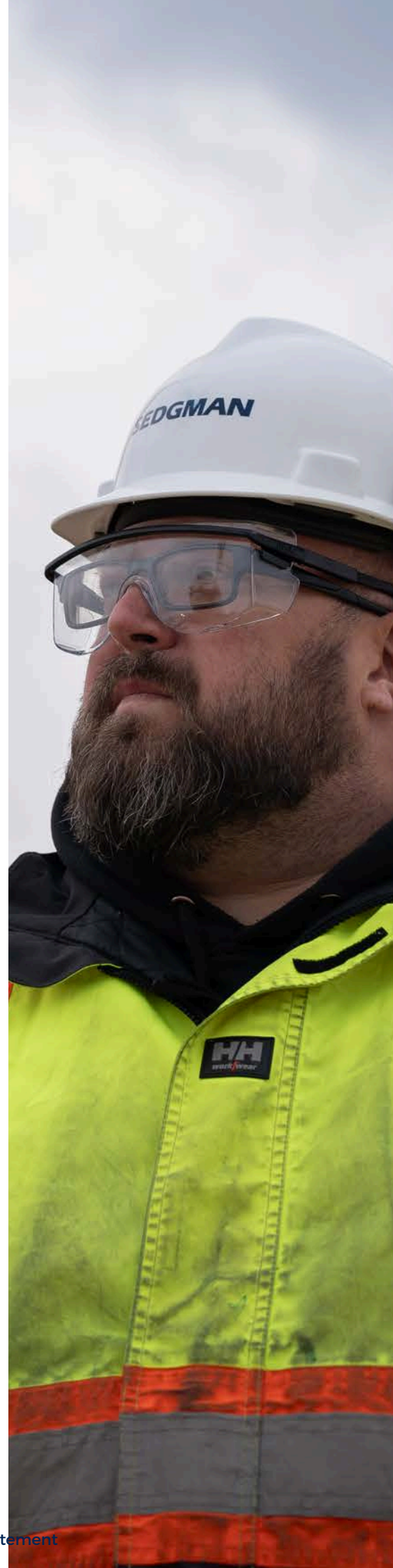
This is a joint report for the period January 1st, 2023, to December 31st, 2023 by the reporting entities, Sedgman Pty Limited ACN 099 471 667 and Sedgman Canada Limited (**Sedgman Group**) collaborating together (the **Report**), in accordance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act S.C. 2023, c. 9 (the “**Act**”).

The reporting period represents each entity’s financial year.

Sedgman Pty Ltd (**Sedgman**) is a corporation organized under the laws of Australia with its registered (and head corporate) office in Brisbane, Queensland, Australia. Sedgman is a wholly owned subsidiary of CIMIC Group Limited ACN 004 482 982 (also incorporated under the laws of Australia) (**CIMIC**).

Sedgman Canada Ltd. (**Sedgman Canada**) is a corporation organized under the Province of Ontario, principally located in Vancouver, BC, Canada and is a wholly owned subsidiary of Sedgman.

Together, the Sedgman Group are entities producing Goods (as defined in the Act) in Canada.





## 1 SEDGMAN GROUP ACTIVITIES

The Sedgman Group's team of around 800 employees globally (approximately 110 in Canada) deliver sustainable solutions for efficient resource extraction. This report describes how we embed a disciplined approach, across the Sedgman Group, to identify, mitigate and prevent the risk in our operations and supply chain of all forms of Modern Slavery, including forced labour and child labour (**Modern Slavery**).

Our [Code of Conduct](#), governance framework, and control systems, continue to support due diligence and compliance across our employment and procurement practices. Our training programs embed our Code of Conduct and specifically require Modern Slavery awareness training to build our team's awareness and skills to identify and report risks of forced labour and child labour.

Further detail is provided below.





## 2 STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

In 2023, for the purpose of this joint report the Sedgman Group is reporting on the operations and supply chains of the following reporting entities: Sedgman Canada Limited and Sedgman Pty Limited. The Sedgman Group corporate structure is depicted in the diagram on page 3.

The CIMIC Group and the Sedgman Group are also subject to and submit an annual joint Modern Slavery statement in compliance with Modern Slavery reporting obligations in Australia pursuant to the Australian Commonwealth legislation: Modern Slavery Act 2018 (Cth).

The Sedgman Group has offices in Australia (Perth, Brisbane and Mackay), China (Shanghai) and Canada (Vancouver and Montreal).

### Activities

The Sedgman Group is a leading provider of integrated minerals processing solutions. Our 250-strong portfolio of high-performing processing plants and supporting mine-site infrastructure showcases the value of specialist focus. Since 1980, the Sedgman Group has advanced the standard of excellence and innovation for clients across diverse commodities including iron-ore, precious and base metals, and industrial and critical minerals. From engineering design to project delivery to operations, our integrated approach creates a unique 360° feedback loop that drives continual improvement. We partner with our clients to ensure tailored world class outcomes that stand apart for reliability, efficiency, productivity and performance – optimising client investments, maximising resource recovery and lowering unit costs.

Our regional experience spans major global markets, having successfully delivered projects in many countries around the world. Our work today is supported by teams based in Australia, Canada and China that are skilled in developing solutions to address regional needs and operating environments. Our multi-disciplinary engineering capability further enables us to meet the demands and complexities of diverse and remote environments. World-class outcomes are achieved by this melding of local capability with global specialist knowledge-sharing, common systems and our historical database of insights.

Specifically, within Canada the Sedgman Group's activities include the provision of engineering, procurement, project management (including procurement management) and project execution services in the mineral processing and industrial minerals industries. Within Canada these services are provided through all stages of the project lifecycle from project initiation, development and construction and operations support.



## Supply Chain

In respect of its Canadian operations, the Sedgman Group procures goods and services from Canada and overseas.

In 2023, the Sedgman Group worked with over 800 direct domestic and international suppliers with key areas of spend including:

- materials such as concrete, steel and piping;
- industrial/engineering consumables such as fuel, lubricants and other consumables;
- major plant and equipment and mineral processing equipment;
- personal protective equipment (PPE);
- subcontractors such as electricians and other tradespeople;
- labour hire;
- insurance;
- professional services; and
- technology and telecommunications.

We source products and services from suppliers and/or subcontractors. The products we procure are those used in development, design, construction, operations and maintenance, and management of our projects and the related corporate functions.

Our procurement of services includes activities that relate to corporate support such as facilities and maintenance, accounting, legal and IT services, and professional consulting services such as design and engineering, all of which complement our own internal resources for either short or long-term engagements as required.

Given the project operational nature of the Sedgman Group's business, its supply chains and location of manufacture / origin will change for each project depending on commodity, location and client. During 2023, Sedgman Canada imported equipment and componentry associated with mineral processing from various locations including Australia, Brazil, China, France, Germany, India, Mexico, Netherland, Turkey, South Africa, the United States of America and Vietnam. Further detail on the mapping processes we have undertaken to address geographic risks for Modern Slavery are contained in the Mapping Supply Chains section of this report, page 11.

During the reporting period Sedgman Canada also engaged local Canadian fabricators and equipment suppliers along with local construction and commissioning subcontractors within its Canadian operations. Most of the personnel engaged within Sedgman Canada's local operations are highly skilled workers which reduces the risk of Modern Slavery in this aspect of the Group's supply chain.



# 3 POLICIES AND DUE DILIGENCE PROCESSES

## Governance and Leadership

As a member of the CIMIC Group, the Sedgman Group's governance framework is founded in the CIMIC Group Principles of Integrity, Accountability, Innovation and Delivery, underpinned by Safety. These Principles guide all of the Sedgman Group's activities and form the basis of the CIMIC Group Code of Conduct which sets the standard of behaviour we expect from all our employees, subcontractors and partners.

Our governance framework delegates the management thereof to the Sedgman Group's senior management, under the leadership of the Sedgman Managing Director. The Sedgman Group operates under a comprehensive series of CIMIC Group policies, procedures, frameworks, and guidelines relating to corporate governance, human rights, ethics, and financial and risk management in place across our operations. This provides overall operating parameters for our entities, together with Sedgman-specific governance documents and activities, which support the overall operating framework. Many of these are directly applicable to our efforts to combat forced and child labour and are described in more detail below. Our Governance Framework is also summarised in **Appendix 1**, page 21.

Consistent with its group structure, the Sedgman Group reports to the CIMIC Group, which in turn reports to the CIMIC Group Board's Ethics, Compliance and Sustainability Committee (**ECSC**). The ECSC assists the CIMIC Group Board in fulfilling its corporate governance and oversight responsibilities, and compliance with all applicable legal and regulatory requirements and internal policies. The ECSC monitors and reviews compliance and performance in the areas of health and safety, diversity and social inclusion, human rights including Modern Slavery, the environment, sustainability, and business conduct.

Managing risk is a critical element of the Sedgman Group's overall business strategy and has been a key contributor to our success. Our risk management framework<sup>1</sup> is tailored to our business, embedded largely within existing processes, and aligned to our objectives, both short and longer term.

The CIMIC Group Risk Management Policy sets out the requirements to identify, analyse, evaluate, treat, monitor, review and report risks that have the potential to impact the Sedgman Group, including our people, third parties, the general public, the communities in which we work and the environment. It also includes our operations, financial outcomes and reputation or other impacts that the Sedgman Group is exposed to.

The Sedgman Group leverages advanced management systems to drive repeatable excellence. Where relevant, we work on shared platforms and processes, underpinned by shared policies, to create efficiency and consistency.

<sup>1</sup> Our risk management processes are aligned to the requirements of the ISO 31000.





# Code of Conduct

All of the Sedgman Group's operations are governed by and must be conducted in accordance with the CIMIC Group's Code of Conduct (Code of Conduct). The Code of Conduct rejects all forms of Modern Slavery including, but not limited to, the trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage and deceptive recruiting for labour and services. The Sedgman Group does not tolerate unlawful child labour or any form of exploitation of children or young people and commits to complying with the International Labour Organisation (**ILO**) with respect to under-age workers. Where the Code of Conduct or a policy sets higher standards of behaviour than local laws, rules, customs or norms, the higher standards apply.

The Code of Conduct applies to all employees of the Sedgman Group, third parties engaged by the Sedgman Group including contractors and their employees, and all alliances and joint ventures in all jurisdictions.

In addition to the Code of Conduct the Sedgman Group adheres to and is guided by the CIMIC Group Modern Slavery Policy. The Modern Slavery Policy sets out the following minimum requirements to manage the risks of Modern Slavery, including forced and child labour:

- promotion of and adherence to a culture of integrity and compliance with the Code of Conduct;
- the adoption of appropriate processes and procedures to assess and address forced and child labour, along with other forms of Modern Slavery within the Sedgman Group;
- employee recruitment procedures;
- due diligence of the Group's supply chains;
- on-going training and awareness;
- carrying out periodic risk assessments; and
- internal control systems.

As set out below the Sedgman Group has a range of activities and due diligence processes and procedures which are relevant to assessing, addressing and managing the risks of forced labour and child labour along with other forms of Modern Slavery.

Sedgman Group leverages its governance, compliance, procurement and people frameworks, to ensure we apply a consistent and disciplined approach across the Sedgman Group.



# Due Diligence Processes – Procurement

Our procurement framework provides policy, systems, and processes to support supply chain due diligence and verify supplier compliance which are aids to identifying and mitigating forced or child labour.

As part of this framework, the Sedgman Group's Dealing with Third Parties Policy and Procurement Policy incorporate:

- the management of forced and child labour risks into our supplier registration (a business integrity check);
- screening and on boarding processes;
- a suite of mandatory standard template commercial contracts which require compliance with Modern Slavery laws, to be used wherever possible; and
- a set of requirements for suppliers' management of their suppliers.

This approach is key to enabling the Sedgman Group to build and maintain a reliable and trusted supply chain, and to proactively identify and manage Modern Slavery risks throughout the term of each contract.

## Supplier Screening and Onboarding

The Sedgman Group has implemented an internationally recognised due diligence solution to screen third parties for a range of risk factors – including the risk of Modern Slavery.

This solution is used to evaluate and monitor vendors, suppliers, and business partners, and screens for a range of risks including, but not limited to, the following areas:

- legal status;
- watch-lists including sanctions and enforcements, adverse litigation, and Politically-Exposed People;
- country and industry risks;
- Modern Slavery risks, bribery and corruption due diligence by screening the Corruption Perception Index and the Global Slavery Index; and
- adverse media.

The solution leverages information from the Global Slavery Index prepared by the Walk Free Foundation, and records of adverse media concerning Modern Slavery allegations and breaches which are collected by various sources.

Based on a multi-factor risk assessment, each supplier is allocated a risk-rating which triggers additional review and assessment and further investigation and due diligence. Identified risks may lead to the preparation of corrective action plans, imposition of conditions, or in some cases, the supplier may be rejected from working with CIMIC Group entities. Accepted suppliers and other third parties are subject to continuous monitoring in the tool for any changes in key risks, for example a change in entity's legal status, or any Watchlist changes.

Since implementing the solution and as of December 2023, the Sedgman Group has risk assessed more than 800 suppliers.

In 2023 we risk assessed approximately 390 suppliers<sup>2</sup>

Supplementing supplier screening via the tool, as part of the supplier registration and pre-qualification process, we require suppliers to complete template supplier pre-qualification questionnaires. Information provided via the questionnaire assists with informing our businesses of any potential vendor risks in areas such as health and safety, quality, financial risks, compliance, and relevant Modern Slavery and ESG factors.

The Group's Dealing with Third Parties Policy and supplier onboarding process also includes specific Modern Slavery due diligence requirements for those we work with.

Suppliers are required to comply with applicable law and the Code of Conduct, and to complete a declaration confirming that no slavery, including forced or child labour, has been used anywhere by the third party or, to the best of the third party's knowledge, by any direct suppliers to the third party.

The declaration specifically requires suppliers to disclose whether they have:

- been subject to or received any prosecutions, regulatory notices, tendering restrictions, sanction notices, litigation or arbitration concerning allegations of Modern Slavery or breaches of human rights by their employees or subcontractors and suppliers;
- been found guilty of a criminal offence which would include Modern Slavery crimes under ss 270 and 271 of the Criminal Code Act 1995 (Cth); and
- a compliance management program in place to meet business integrity laws and regulations, including those relating to Modern Slavery.

Suppliers are also required to notify the Sedgman Group if they become aware of any behaviours that are in contravention of applicable laws and confirm they will not use any payments received from the Sedgman Group in violation of Modern Slavery laws and regulations.

<sup>2</sup> In addition to the approximately 390 suppliers that have been accepted, the Sedgman Group has rejected more than 20 supplier applications on various grounds, which can include modern slavery.



## Template Commercial Contracts

Our Group Procurement Policy requires the Sedgman Group to engage suppliers using the Sedgman Group's suite of template commercial contracts, wherever possible. The suite includes a number of different forms of contract which can be utilised depending on the scope, location, value and complexity of the works or services to be provided, and the risk profile of the relevant project.

Our template commercial contracts require suppliers to:

- comply with the Code of Conduct, ensuring alignment with the Group's expected behaviours;
- warrant that they:
  1. have not been convicted of an offence relating to Modern Slavery
  2. will not breach any Modern Slavery legislation; and
  3. will comply with any requests of the Sedgman Group to comply with all Modern Slavery legislation, including providing information and documents, and allowing interviews to be undertaken.

## Indirect Supplier Controls

The number of indirect suppliers involved in our businesses is substantial. As a supply chain extends, influencing the behaviours and conduct of indirect suppliers is a greater challenge. By raising awareness, engaging ethical direct suppliers, obliging our supply chain to reject the use of Modern Slavery, and performing due diligence, we can gradually exert more influence.

Our contracts require our direct suppliers to warrant that their own suppliers enable them to comply with the direct supplier's obligations under the Group's engagements. Our direct suppliers must:

- ensure their own suppliers read, understand and comply with the Code of Conduct; and
- allow the Sedgman Group to conduct an independent audit of indirect suppliers to ensure, amongst other things, that they are conducting their business in a proper manner and in accordance with applicable codes of conduct and generally accepted business ethics.

## People Framework and Policies

Our overarching People framework guides operations across our business, markets and geographies, facilitating compliance with, and often exceeding, local laws.

## Human Rights Impact Assessment

In addition to processes to review third parties, within the people management area, we utilise Human Rights Impact Assessments (**HRIA**) and self-assessment tools to monitor and audit compliance with our template employment contracts and review **Modern Slavery** indicators such as: wages and benefits, working hours, employment criteria (such as age), freedom of association, health and safety, unlawful discrimination, worker accommodation, government and leadership; people management; community engagement; security arrangements; country risks; and procurement. HRIA's are based on the Human Rights Assessment Quick Check prepared by the Danish Institute for Human Rights.

Assessment steps include engaging leadership, undertaking risk assessment and due diligence, conducting site visits, reporting findings, and developing action plans. Completed HRIAs have also highlighted where the Group is providing employment conditions which are more favourable than common industry practice and/or required by local legislation. Some of these areas include the provision of higher standards for safety, training of unskilled workers and worker medical services.

## Policies and Processes

The Policies and processes within our compliance framework that help to build respectful, safe and inclusive work environments and to mitigate Modern Slavery risks include our:

- Recruitment Policy, procedures and management systems with formal approval gates including verification of the candidate's identity and their right to legally work ;
- Health and Safety Policy;
- Workplace Behaviour Policy;
- Diversity and Social Inclusion Policy;
- Flexible Working Policy;
- Parental Leave Policy;
- Family and Domestic Violence Policy; and
- Redundancy Policy.

Our compliance with relevant Group policies is audited by the Group's internal audit team.

Non-compliances with the Group's People policies are detected through:

- the Incident Management System - that is, notification by employees (either through complaints made to their Manager, Manager's Manager, the Business Conduct Representative or by contacting the group's Ethics Line);
- in relation to Suppliers, the Third Party Screening Tool and procurement process; and
- assurance and auditing activities.

Non-compliances that are identified are then dealt with in accordance with the Group Code of Conduct and the Group Code of Conduct - Management, Monitoring and Reporting Policy.



## 4 FORCED LABOUR AND CHILD LABOUR RISKS

### **Assessment of risks of forced labour and/or child labour in the organization's activities and supply chains**

The Sedgman Group's assessment of risks of Modern Slavery within its business are ongoing and have historically been conducted by both external and internal parties. Some of these assessments are described in more detail in this Statement. Our understanding of the drivers, vulnerable groups and the hidden but pervasive presence of Modern Slavery, and our approach to addressing it, has been informed by the UN Guiding Principles on Business and Human Rights, the UN Global Compact, the UN Sustainable Development Goals and the International Labour Organisation's standards. Our insight has also been facilitated by the Global Slavery Index (GSI) published by Walk Free, our ongoing program of Human Rights Impact Assessments (HRIA), which commenced in 2017, use of our third-party screening tool and on-going supply chain risk assessments.

To assess risks of forced labour and/or child labour in the Sedgman Group's activities and supply chain we implement:

- A dedicated supplier/third party screening tool to screen third parties engaged by the Sedgman Group. See details in Supplier Screening and Onboarding, page 8;
- Human Rights Impact Assessments to extend our identification and understanding of human rights and modern slavery risks in our operations and supply chain. See details in Human Rights and Impact Assessments, page 9; and
- Human rights country analysis led by an independent agency to assess the level to which key human rights are protected, promoted, and respected, in where our Group Operates. See **Appendix 2**, page 23.





## Mapping supply chains

Within Canada, the Sedgman Group procures goods and services from Canada and overseas.

In respect of the procurement of goods, the Sedgman Group, along with others in the CIMIC Group have conducted various mapping activities and risk assessments to identify countries and products within its supply chain that pose a high risk for forced and child labour. In addition to this, the Group has previously engaged a third party to prepare an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains.

Based on the above, the group has identified that there are heightened risks for forced or child labour and other types of modern slavery due to:

- Geographic risks. The Sedgman Group may procure goods from locations that do not have robust protections for workers and/or protections which may not be regularly and consistently enforced. See **Appendix 2**, page 23, for further detail on the independent criteria based review of countries in which the Sedgman Group operates; and
- Industry risk. The Sedgman Group is aware that the construction, manufacturing, mining and utilities industries have higher inherent risks of forced or child labour and other forms of Modern Slavery.<sup>3</sup>

The assessments referred to above resulted in the development of the group's third party screening tool that, among other things, assesses risk of forced and child labour for each supplier as part of the supplier pre-qualification process. The tool is tailored to address specific risks which have been identified. The Sedgman Group also uses additional, local screening tools in geographical locations that may pose a high risk for Modern Slavery. For example, suppliers based in China are subject to additional local and targeted due diligence provided by a third party system.

In addition, we refrain from purchasing 'at risk' goods and services (being those goods our internal risk assessments have assessed as being a high risk of Modern Slavery due to industry or location) and inadvertently contributing to Modern Slavery.

<sup>3</sup> International Labour Office, Profits and Poverty: The Economics of Forced Labour <https://www.ilo.org/>

## Steps to manage forced labour and child labour risks

In addition to developing and implementing the due diligence policies and processes referred to above for identifying, addressing, and prohibiting the use of forced labour and/or child labour in the group's activities, the Sedgman Group also takes the following additional steps to manage forced labour and child labour risks:

- Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily: the CIMIC Group's Modern Slavery Protocol and supplier pre-qualification process provides guidance to assess and address the risks of Modern Slavery and outlines employee recruitment and selection practices, in accordance with relevant policies and procedures;
- Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour: Our compliance, due diligence and internal audit framework engages and educates our business on their compliance obligations - including the requirements stated in the Group's [Code of Conduct](#) and policies such as [Modern Slavery Policy](#), [Anti-Bribery and Corruption Policy](#), [Dealing with Third Parties Policy](#), [Group Procurement Policy](#), [Health and Safety Policy](#), [Workplace Behaviour Policy](#) and [Whistleblower Policy](#); and
- A range of activities facilitate Modern Slavery due diligence across the Group including:
  1. the convening of a Modern Slavery Committee which engage People, Procurement, Legal, Compliance, Sustainability and Communications functional leads. Meeting bi-monthly (or as required), the committees' objectives are to identify Modern Slavery risks and mitigations for our operations and supply chains, share ideas for continuous improvement and integrate appropriate controls with existing business processes;
  2. the conduct of periodic reviews, by the Group Compliance Manager, assessing the effectiveness of the use of a third party screening tool, see details in [Compliance and Assessing Effectiveness](#), page 16, including reviewing activities addressing Modern Slavery risk; and
  3. the investigation, evaluation and measurement of the effectiveness and adequacy of the CIMIC Group Policies and the Code of Conduct, by the Group's quality Team and our shareholder's internal audit functions, who perform an independent assurance function and provide reports to the Board.



# 5 REMEDIATION MEASURES & REMEDIATION OF LOSS OF INCOME

To date, the Sedgman Group's processes have not identified any instances of forced or child labour requiring remediation.

Based on the risk assessments undertaken as at 30 December 2023, the Sedgman Group has determined that vulnerable families have not experienced loss of income as a result of any of the steps the Group has taken to eliminate forced labour or child labour risks.

Summarised below, however, are the more general processes in place which detail the remediation measures in place should the group become aware of any adverse situations.

Action	Comment
Developing and implementing an action plan for addressing forced labour and/or child labour	<p>The Sedgman Group is guided by the CIMIC Group's Modern Slavery Policy and its associated procedures.</p> <p>These documents require the following as part of the Sedgman Group's action plan to address forced and child labour (all of which are set out in more detail elsewhere in this Report):</p> <ul style="list-style-type: none"> <li>• Prequalification of all suppliers;</li> <li>• Only engaging suppliers who have been approved through the pre-qualification process; and</li> <li>• Inclusion of contractual provisions and requirements to ensure compliance by all suppliers with the Act and general compliance with relevant Modern Slavery and forced and child labour laws and standards.</li> </ul>
Engaging with supply chain partners on the issue of addressing forced labour and/or child labour	<p>The Sedgman Group engages with its supply chain through the pre-qualification process and our requirements regarding forced and child labour are codified within our contractual terms.</p>

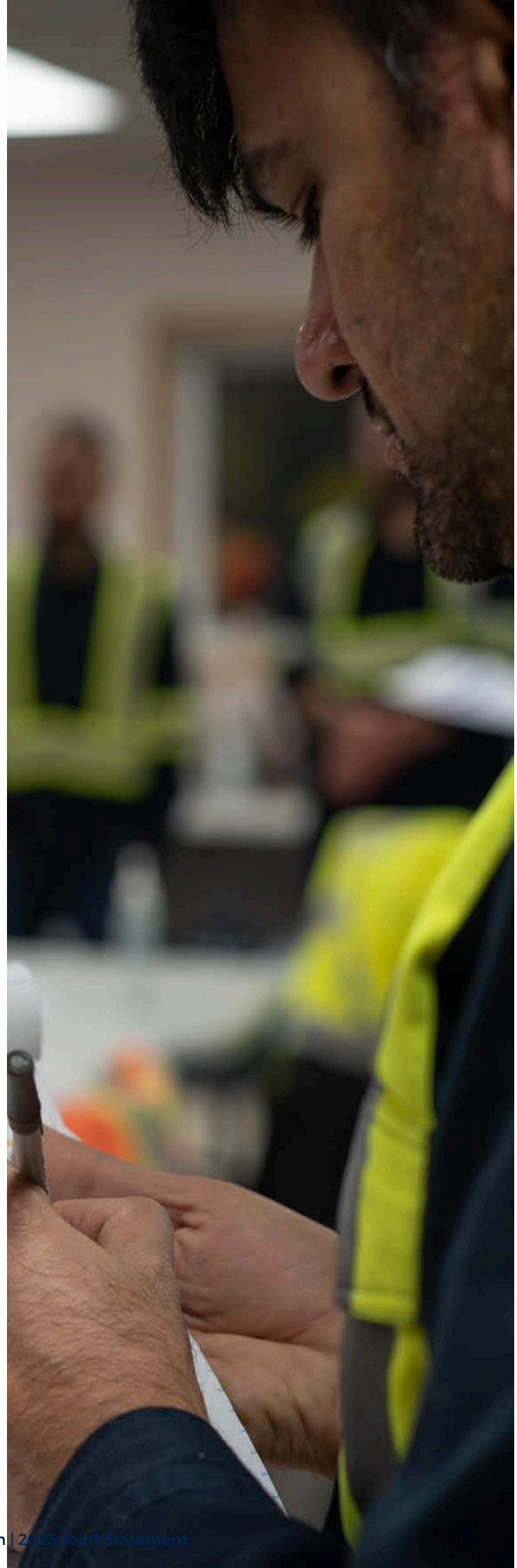


## 6 TRAINING

The Sedgman Group conducts mandatory training for all employees to ensure that all of its personnel are:

- aware of the risks of forced or child labour with the group's operations, along with other modern slavery risks;
- the Group's expectations around ethical behaviour; and
- processes and procedures in place to report any concerns or adverse situations.

These processes are described further in the following table.





Action	Comment
<p>Developing and implementing grievance mechanisms</p>	<p>Our Complaints and Investigation Procedure, Workplace Behaviour Policy and Whistleblower Policy, confidential, independent Ethics Line, and approach to investigating, addressing and remediating breaches, all work together to encourage and reliably manage reporting of any potential unethical practice.</p> <p>Specific training on the Whistleblower Policy is provided in conjunction with the Group's Code of Conduct training.</p> <p>For further details see Grievance and Reporting Mechanisms, page 18.</p>
<p>Developing and implementing training and awareness materials on forced labour and/or child labour</p>	<p>On the-job development is complemented with a range of learning experiences that build skills and technical capabilities and these are underpinned by our Principles and Code of Conduct.</p> <p>Our foundational Code of Conduct training covers the CIMIC Group's Principles and <u>Code of Conduct</u>, ethical behaviour, and key policies including: health, safety and environment; unlawful discrimination; anti-bribery and corruption; and anti-bullying and harassment.</p> <p>We require employees to complete Code of Conduct training via e-learning within three months of their commencement with refresher training completed every two years. We also provide more detailed face-to-face training to employees in high risk roles.</p> <p>Whistleblower, equal employment opportunity, bullying and harassment, cultural awareness, and family and domestic violence training are also mandatory for all staff employees.</p> <p>The Group's Modern Slavery training, which is also mandatory for all employees, equips our people to recognise and report Modern Slavery risks. This training is made available online for staff and may also be conducted in face-to-face workshops with managers and employees in procurement and people roles. Communication resources support the training, facilitating greater understanding of the issue and its importance to our business.</p> <p>Additionally, depending on roles, some employees are also required to complete specialised face-to-face training on relevant topics. We also provide additional specialised face-to-face training on relevant topics such as competition law issues.</p>
<p>Developing and implementing procedures to track performance in addressing forced labour and/or child labour</p>	<p>In addition to ongoing due diligence assessment and monitoring of suppliers, the Sedgman Group has contractual remedies should it become aware of instances of forced or child labour.</p> <p>The Group's Modern Slavery training also educates relevant staff on ways to identify and report instances of Modern Slavery so that appropriate action may be taken.</p>



## 7 COMPLIANCE AND ASSESSING EFFECTIVENESS

Our assessment of effectiveness is evidence based and includes monitoring and analysing risk analysis and compliance audit results, supplier screening and risk assessment, monitoring and closeout of corrective action plans, training participation rates, communications engagement, HRIA results, the completion of improvement plans and responsiveness to grievances. Quantitative data and regular qualitative reviews facilitated by our governance framework shape our annual planning process.

All relevant policies and procedures are regularly reviewed and are also reviewed when there are changes to relevant legislative requirements or other industry changes.

In 2024 the Group plans to undertake further risk assessments on inherent country risk within its operations with the assistance of an external third party. This, along with other internal review processes, will amend and update the supplier/third party screening tools based on a comprehensive review of the effectiveness of the tool.

Ethical matters are reviewed by the Reportable Conduct Group<sup>4</sup> and the Sedgman Board, which oversee matters related to ethical standards and practices, and compliance with applicable legal and regulatory requirements and internal policies.

In 2023, a range of actions were taken to enhance our capabilities to identify, mitigate and prevent Modern Slavery risks across the Group's operations and supply chain, and respond should any impacts occur, including the following:

<sup>4</sup> The Reportable Conduct Group comprises Sedgman's Managing Director, Business Conduct Representative, Chief Financial Officer, Head of Safety, and Head of People.



## Operations

### Governance and Compliance

- Continued embedding Sedgman Group's Modern Slavery Policy and Protocol across the Group, which sets out the responsibilities and accountabilities for Modern Slavery risks and controls.
- Continued to collaborate within the Sedgman Group including CIMIC to review, assess and understand the human rights risks for each Operating Company and the Group.

### People and Employment Training

- Conducted Code of Conduct training.
- Conducted Modern Slavery awareness training.
- Conducted Whistleblower Legislation training.

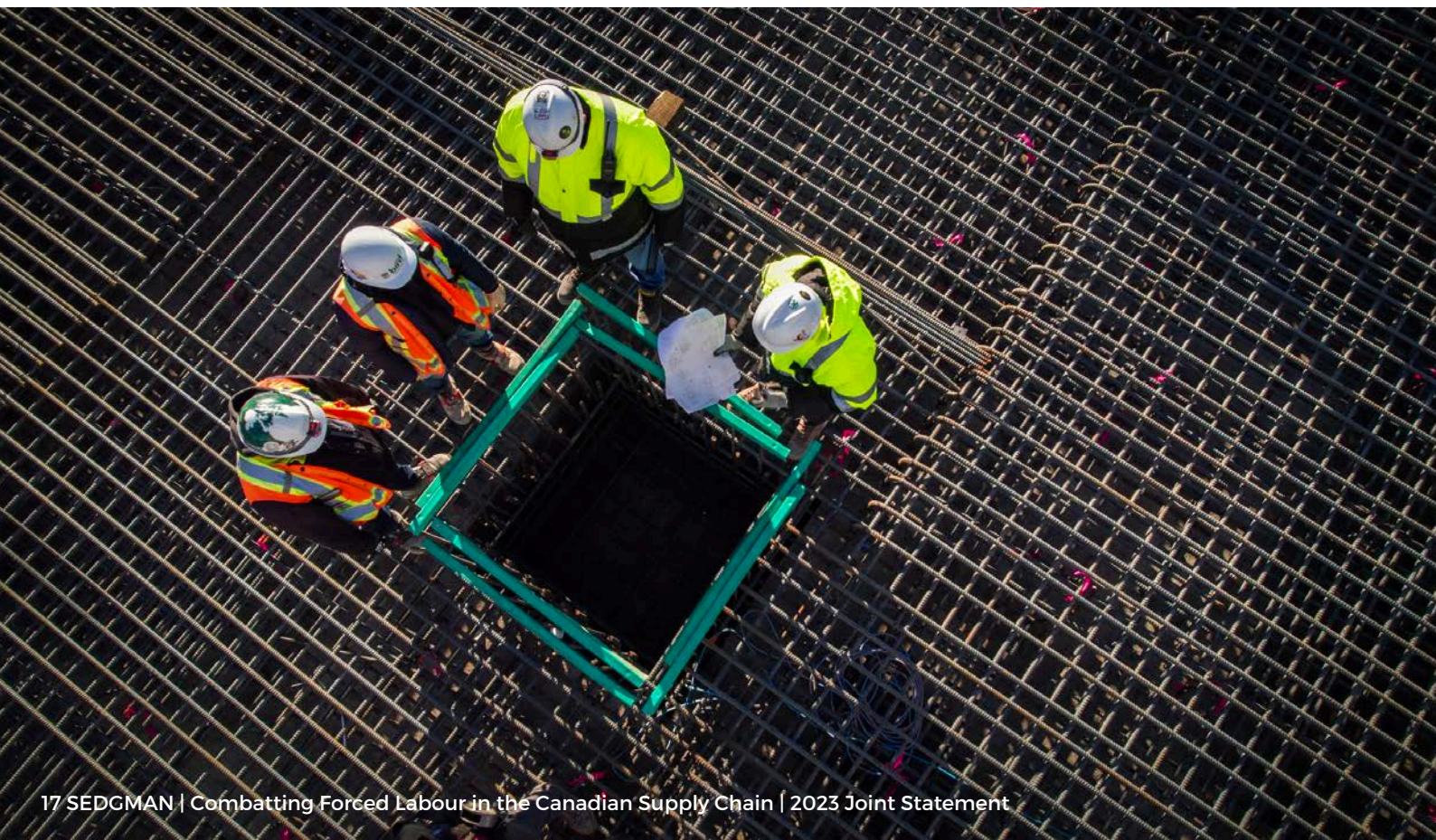
## Supply Chain

### Governance and Compliance

- Continued embedding Sedgman Group's Compliance Policy and Procedure including Modern Slavery Plans and other controls and tools.
- Continued consultation within the Sedgman Group and CIMIC in the Modern Slavery Committee Meetings and the Compliance Working Groups.

### Procurement

- Continued embedding the Dealing with Third Parties Policy, Group Procurement Policy and Modern Slavery Policy and Protocol within the Sedgman Group's Procurement teams.
- Undertook periodic review of the third party screening tool.
- Continued to perform supply chain risk assessments, having regard to commodity, industry, jurisdiction, spend, dependency, length of relationship and reputation.





## 8 GRIEVANCE AND REPORTING MECHANISMS

Open communication is key to maintaining our Code of Conduct. We encourage our employees, subcontractors and partners to voice their concerns should they come across any potentially unethical practices – including any human rights grievances or concerns.

Our Group Code of Conduct – Management, Monitoring and Reporting Procedure; Anti-Bullying, Harassment and Discrimination Policy and Whistleblower Policy; confidential, independent Ethics Line; and approach to investigating, addressing and remediating breaches, all work together to encourage and reliably manage reporting of any potential unethical practice.

Whistleblowers can remain anonymous and all disclosures, including Modern Slavery concerns, may be referred to the authorised Business Conduct Representative<sup>5</sup> who ensures that any disclosure is investigated appropriately, promptly, and confidentially. The Workplace Protection Officer is also responsible for safeguarding the interests of any Whistleblower within the organisation.

<sup>5</sup> The Business Conduct Representative is the Sedgman General Counsel.



# 9 LOOKING AHEAD

## 2024 Priorities

Over the next year, the Sedgman Group will focus on continuing to:

- enhance our understanding and knowledge of Modern Slavery risks;
- implement a revised HRIA assessment tool within the Group for future HRIAs and continue to assess and update other modern slavery tools and controls where relevant;
- continue to conduct a review of our approach to Modern Slavery risk management with reference to the relevant Australian and Canadian legislation;
- continue to risk assess new suppliers, vendors and business partners using the third party screening tool and, if necessary, develop and implement appropriate corrective actions plans and/or remediation measures;
- monitor existing suppliers, vendors and business partners using the third party screening tool to identify, among other things, any breaches, fines or sanctions in relation to Modern Slavery and other ESG risks;
- build our people's capability to recognise and report risks of Modern Slavery, including via the group's grievance mechanisms;
- continue raising employee awareness via mandatory Modern Slavery training and other compliance training modules; and
- continue our Modern Slavery risk monitoring and reporting activities.



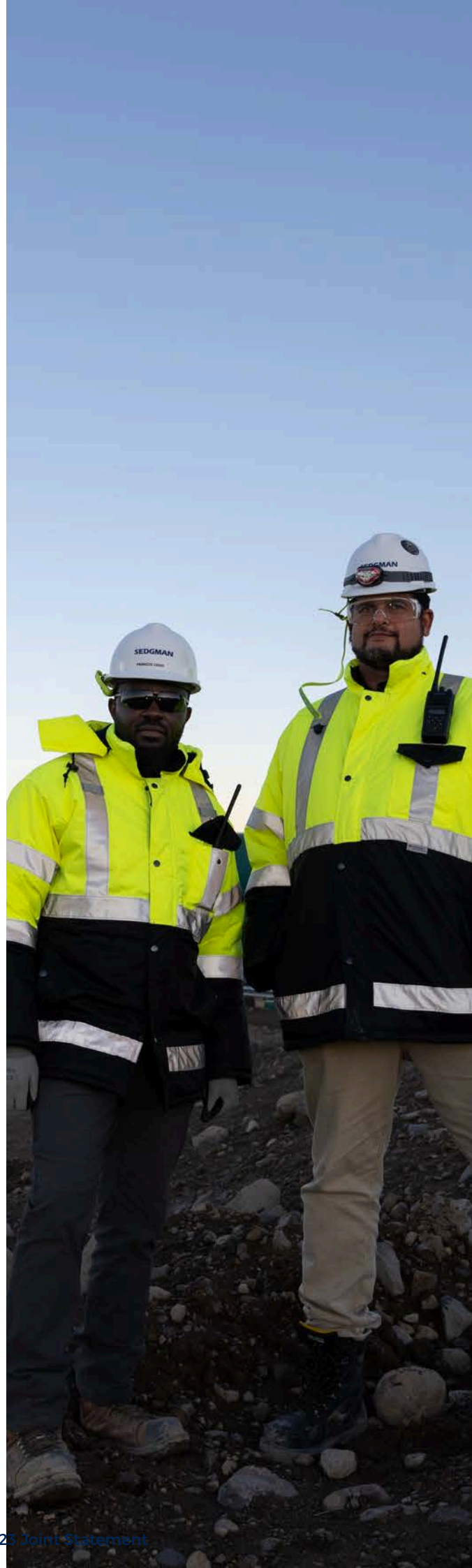
## Ongoing Engagement and Communication

We will continue to engage with Government, industry, regulators and other organisations to build awareness and understanding to combat Modern Slavery.

Engagement is a key input to our continuous focus on Modern Slavery risks and developing a trusted supply chain.

We value gaining and sharing insights with and from relevant organisations:

- Government and regulatory bodies in the different regions in which we operate – Our Compliance Team monitors for updates on the status of legislation and developments in the area of Modern Slavery;
- Industry Associations – We value and consider guidance, advice and recommendations provided by industry associations in the regions in which we operate to assist with identifying and addressing Modern Slavery risk in the construction, services and resources sectors. We hold memberships with multiple trade, industry and not-for-profit organisations, at local, regional, national and international levels; and
- External presentations, seminars or forums – Members of our People, Legal and Compliance teams attend and/or participate in numerous external presentations, seminars or forums to improve their awareness of modern slavery risks and to embed learnings within the business.



# APPENDIX

## Appendix 1 –Corporate Governance Framework

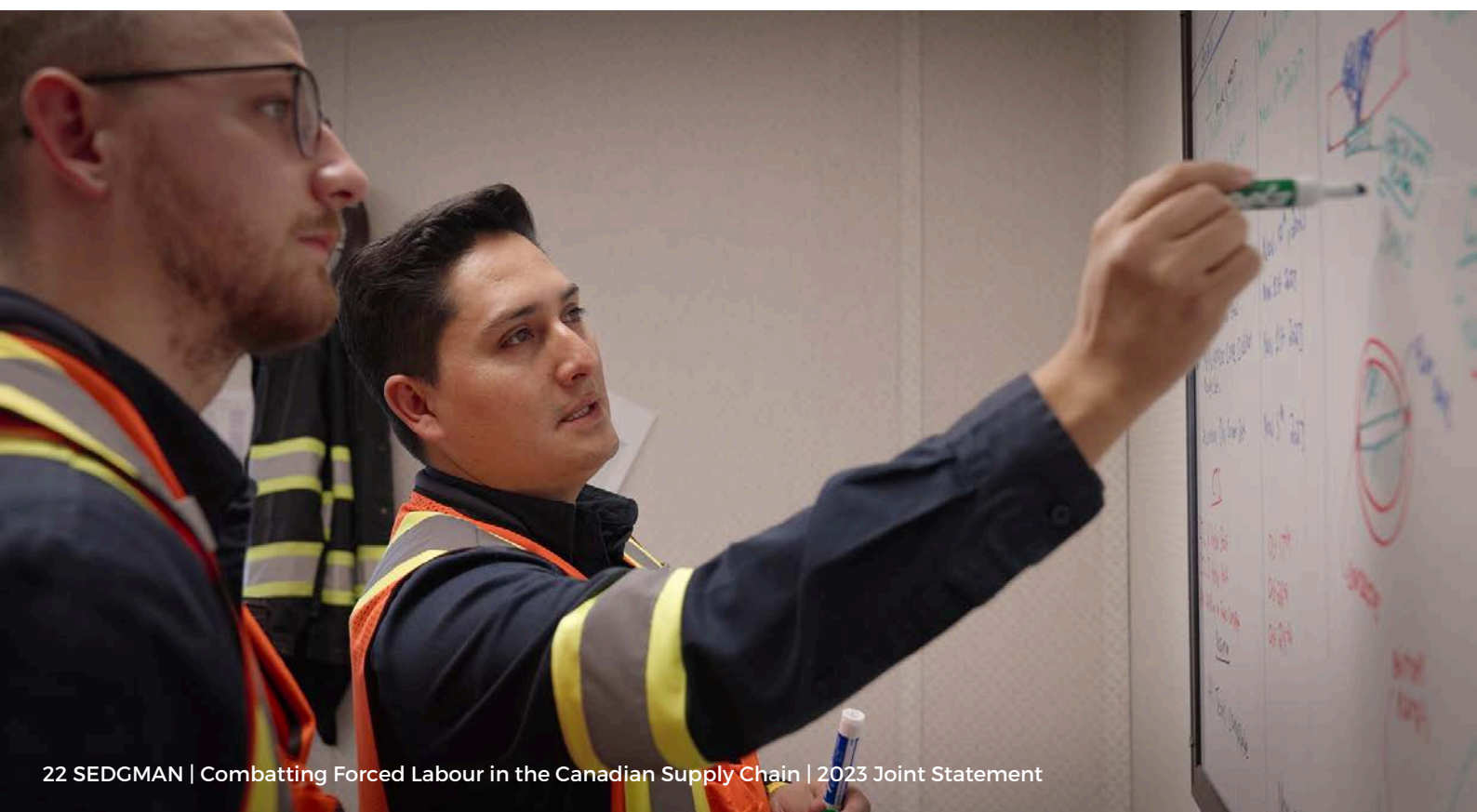
	Group Alignment	Risk and Performance Management	Engagement and Continuous Improvement
<b>GOVERNANCE</b>	<ul style="list-style-type: none"> <li>Principles</li> <li><u>Code of Conduct</u></li> <li>Board and Committees</li> <li>Policies and procedures</li> </ul>	<ul style="list-style-type: none"> <li>Risk management framework</li> <li>Management systems</li> <li>Board Committee Charters</li> <li>Group Governance System</li> </ul>	<ul style="list-style-type: none"> <li>Business Conduct Representative</li> <li>Reportable Conduct Group</li> <li>Board Audit and Risk Committee</li> <li>Board Ethics, Compliance and Sustainability Committee</li> <li>Ongoing liaison with Government, industry, and regulators</li> </ul>
<b>COMPLIANCE</b>	<ul style="list-style-type: none"> <li>Policies relevant to Modern Slavery issues, such as:               <ol style="list-style-type: none"> <li>Approval to Operate Internationally Policy</li> <li><u>Modern Slavery Policy</u></li> <li>Modern Slavery Protocol</li> <li><u>Sustainability Policy</u></li> <li><u>Health and Safety Policy</u></li> <li><u>Whistleblower Policy</u></li> <li>Anti-Bribery and Corruption Policy</li> <li>Gift and Hospitality Policy</li> <li>Compliance Policy</li> </ol> </li> <li>Compliance Working Group</li> <li>Modern Slavery Committees</li> </ul>	<ul style="list-style-type: none"> <li>Annual compliance audit</li> <li>Internal audit</li> <li>Board Audit and Risk Committee review</li> <li>Board Ethics, Compliance and Sustainability Committee review</li> </ul>	<ul style="list-style-type: none"> <li>Grievance and reporting mechanism:               <ol style="list-style-type: none"> <li>Group Code of Conduct - Management, Monitoring and Reporting Procedure</li> <li>Independent Ethics Line</li> </ol> </li> </ul>





# APPENDIX

	Group Alignment	Risk and Performance Management	Engagement and Continuous Improvement
<b>PROCUREMENT</b>	<ul style="list-style-type: none"> <li>Dealing with Third Parties Policy</li> <li>Procurement Policy</li> </ul>	<ul style="list-style-type: none"> <li>Supplier registration</li> <li>Supplier screening tool and onboarding</li> <li>Third Party Anti-Bribery, Corruption and Business Integrity Declaration</li> <li>Template commercial contracts</li> </ul>	<ul style="list-style-type: none"> <li>Supplier access to grievance and reporting mechanism.</li> <li>Independent Ethics Line</li> </ul>
<b>PEOPLE</b>	<ul style="list-style-type: none"> <li>People policies including               <ol style="list-style-type: none"> <li>Recruitment Policy, procedures and management systems</li> <li>Workplace Behaviour Policy</li> <li><u>Anti-Bullying, Harassment and Discrimination Policy</u></li> <li><u>Diversity and Social Inclusion Policy</u></li> <li>Flexible Working Policy</li> <li>Parental Leave Policy</li> <li>Family and Domestic Violence Policy</li> <li>Redundancy Policy</li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>Human Rights Impact Assessments</li> <li>People policies audit</li> </ul>	<ul style="list-style-type: none"> <li>Education and training               <ol style="list-style-type: none"> <li><u>Code of Conduct</u></li> <li>Compliance</li> <li>Leadership</li> <li>Modern Slavery Equal employment opportunity, antibullying, harassment and discrimination</li> </ol> </li> <li>Reporting and grievance frameworks</li> </ul>





# APPENDIX

## Appendix 2 – Human Rights Country Analysis

### HUMAN RIGHTS COUNTRY ANALYSIS

Independent criteria-based review of countries where we operate:

The human rights country analysis, established in collaboration with the CIMIC Group in 2021 and refreshed in 2023, was led by an independent agency.

The analysis assessed the level to which human rights are protected, promoted, and respected, in each country where the Sedgman Group operates, specifically analysing:

- Protection – human rights protection offered by government and institutions;
- Promotion – legal human rights due diligence requirements applicable to companies, the legislation in force and the voluntary framework on business and human rights; and
- Respect – the most vulnerable human rights issues.

Each country was assessed against 12 criteria, under the following frameworks, conventions, and indexes:

- United Nations Human Rights Framework
  1. Ratification of United Nations Treaties
  2. Presence in United Nations Committees
  3. Reporting to the United Nations Committees
- International Labour Organisation
  1. Ratification of ILO Fundamental Conventions
- Regional Human Rights Framework
  1. Regional Systems of Human Rights
- National Human Rights Indexes
  1. Fragile States Index
  2. Corruption Perception Index
  3. Modern Slavery Index
  4. Death Penalty Index
  5. Average Working Hours (ILO)
  6. Global Gender Gap Ranking 2020
  7. Global Rights Index 2021.

This information supports our relevant managing functions in developing appropriate controls to prevent, mitigate or respond to each risk.

In 2023, we continued to review and assess our human rights risk profile with a country risk analysis in our countries of operation, leveraging the 2021 risk analysis.

Our ongoing risk analysis has provided deeper insight into the human rights landscape associated with each country's political, social, and economic context; legal requirements for businesses' human rights due diligence; and main human rights risk factors. This information supports our relevant managing functions in developing and monitoring appropriate controls to prevent, mitigate or respond to each risk

# SEDGMAN

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