



ABERGELDIE
COMPLEX INFRASTRUCTURE

MODERN SLAVERY STATEMENT

2021

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MESSAGE FROM OUR CEO

MARK BRUZZONE

At Abergeldie our aim is to build better communities. We are in the privileged position of being able to do this on a very tangible level by building infrastructure such as water and sewage treatment plants, bridges and walkways that directly improve communities and make them more sustainable. It goes further than that though, since the company started in 1994, we have always adopted a policy of giving back to the community. This stems from the mindset of the founders, Mick and Robin Boyle, who strongly believe the cohesiveness of our society relies on people giving their time, experience, and resources to assist others. An inherent part of this organisational commitment is to ensure that our business operations and supporting supply chains are free from modern slavery practices.

Modern slavery can constitute human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and child labour. There is an estimated 40 million people globally that remain victims of modern slavery. There is no place for modern slavery in the Australian community or in global supply chains that support delivery of Australian goods and services. Abergeldie rejects modern slavery and is committed to playing our role in eradicating the activities that contribute to the exploitation of others.

Through this, our first Modern Slavery Statement, in unison with our existing governance and risk management systems, processes and procedures, Abergeldie highlights our approach to identify, manage, and mitigate the risk associated with modern slavery in our business operations and supply chains. Taking action to combat modern slavery helps to protect our business against harm and improve the integrity and quality of our supply chain enabling us to delivery projects, ensuring we can continue in our mission of building better communities.



Key to ensuring that Abergeldie can assess and address modern slavery risks in our supply chain is our procurement policies which require us to undertake a structured due diligence program for suppliers and service providers designed to identify and assess a range of potential risks in the supply chain, including human rights. Where possible, we prefer to work with suppliers to resolve potential issues instead of ending the relationship. These policies and procedures underpinned by our corporate values and culture of doing what is right help to minimise the risk associated with modern slavery in our operations. By adopting and promoting this approach to business we hope to lead by example and encourage other companies and organisations follow suit - thereby supporting our aim to build better communities.

This statement was approved by the Board of Abergeldie on 30 March 2021.

A handwritten signature in black ink, appearing to read 'Mark Bruzzone'.

Mark Bruzzone
Chief Executive Officer
Abergeldie Complex Infrastructure

INTRODUCTION

This is Abergeldie's inaugural Modern Slavery Statement, given under the Modern Slavery Act 2018 (Cth) ("Act"), which outlines Abergeldie's approach to identifying, managing and mitigating the risks of modern slavery within our operations and supply chain.

This Modern Slavery Statement is prepared in consultation with each reporting entity in the Abergeldie Group and is approved by the principal governing body of Abergeldie, the ultimate holding company of the group.

WHAT IS MODERN SLAVERY?

Modern slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom. There are an estimated 40.3 million victims of modern slavery globally. Women and girls are over-represented, comprising 71 percent of victims and nearly two-thirds of modern slavery victims are in the Asia-Pacific region.

Modern slavery is defined by the Act to include eight types of serious exploitation and which can be understood as:

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



40.3 million victims of slavery globally.



71% is estimated to be women.



Two-thirds are in the Asia-Pacific Region.

OUR COMMITMENT

We are committed to continual improvement and working with our supply chain to ensure that our processes remain effective in identifying, preventing and/or mitigating modern slavery. Our strategy is underpinned by our CSR framework and the values of ensuring ethical standards, legal compliance and meeting international standards to produce an overall positive impact on society.



WATER



BRIDGES



TRANSPORT



UNDERGROUND



ENERGY



REMEDICATION

WHO WE ARE

Abergeldie is a civil engineering contractor with over 25 years' experience providing services in the utilities, energy and infrastructure sectors. We design and construct complex infrastructure projects including dams, bridges, tunnels, water and wastewater treatment facilities, rail infrastructure, mining infrastructure, electrical and energy storage infrastructure, marine works and pipeline rehabilitation: the complex infrastructure needed to build better communities.

We apply the professional engineering and management standards of a major contractor but with a collaborative, approachable and flexible culture that adapts to the unique and diverse requirements of individual clients and projects.

Our purpose to building better communities goes beyond delivering the projects that tangibly improve and connect communities, it is also deeply embedded into our core values as a civil engineering business.

We are dedicated and committed to continue this mission by caring about sustainability, equal opportunity rights and combating modern slavery practices.

Abergeldie employs approximately 450 people across Australia and New Zealand. We have offices in Sydney, Newcastle, Brisbane, Canberra, Melbourne and Auckland.

Abergeldie Contractors Pty Ltd
ABN 47 004 533 519

Abergeldie Energy Pty Ltd
ACN 635 707 363

Abergeldie Constructions Pty Ltd
ABN 60 090 805 959

Abergeldie Rail Pty Ltd
ABN 47 130 586 551

Abergeldie Underground Pty Ltd
ABN 56 126 137 693

Abergeldie Structural Fabrications Pty Ltd
ABN 44 136 489 088

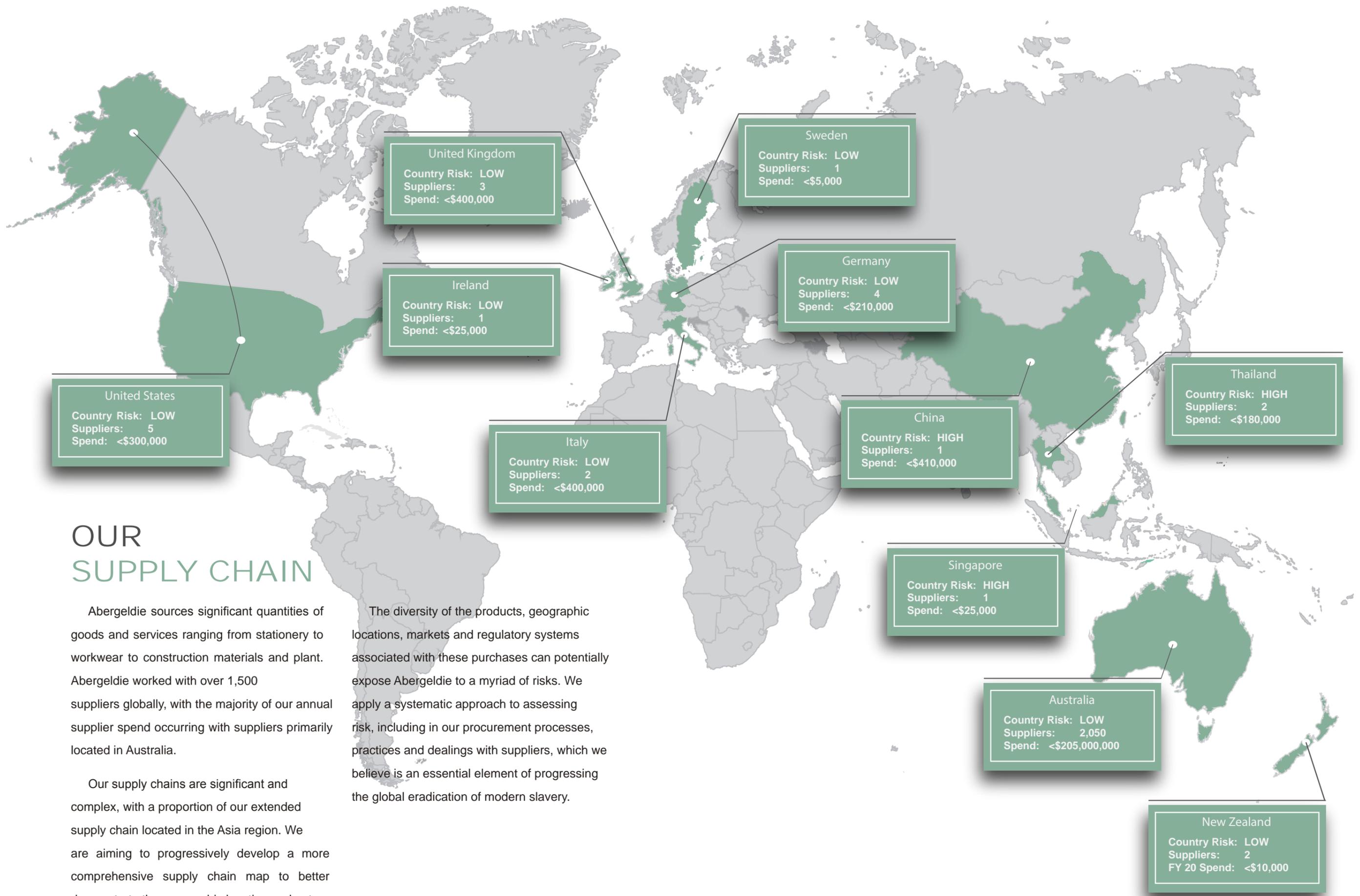
Abergeldie Complex Infrastructure Ltd (NZ)
NZBN 94 290 459 309 97

Abergeldie Rehabilitation Pty Ltd
ABN 90 601 658 066

Abergeldie Plant Pty Ltd
ABN 38 128 796 001

Abergeldie Personnel Pty Ltd
ABN 34 128 796 047

OUR STRUCTURE



OUR SUPPLY CHAIN

Abergeldie sources significant quantities of goods and services ranging from stationery to workwear to construction materials and plant. Abergeldie worked with over 1,500 suppliers globally, with the majority of our annual supplier spend occurring with suppliers primarily located in Australia.

Our supply chains are significant and complex, with a proportion of our extended supply chain located in the Asia region. We are aiming to progressively develop a more comprehensive supply chain map to better demonstrate the geographic location and nature of products and services sourced.

The diversity of the products, geographic locations, markets and regulatory systems associated with these purchases can potentially expose Abergeldie to a myriad of risks. We apply a systematic approach to assessing risk, including in our procurement processes, practices and dealings with suppliers, which we believe is an essential element of progressing the global eradication of modern slavery.

AREA	MAIN OPERATIONS	SUPPLY CHAIN
Abergeldie Complex Infrastructure Pty Ltd Abergeldie Contractors Pty Ltd Abergeldie Constructions Pty Ltd Abergeldie Rail Pty Ltd Abergeldie Underground Pty Ltd Abergeldie Energy Ardent Underground Pty Ltd	<ul style="list-style-type: none"> General Civil Construction Construction and maintenance of railway infrastructure Civil construction within railway corridor Construction of tunnels and shafts Operations based primarily out of Sydney Underground hydrogen gas storage tanks 	<ul style="list-style-type: none"> Concrete and steel suppliers Quarries Hardware stores Office supply stores Contractors Specific equipment and/or materials as nominated by clients Plant and equipment hire suppliers Equipment and/or materials as nominated by clients
Abergeldie Rehabilitation Pty Ltd Abergeldie Contractors Pty Ltd	<ul style="list-style-type: none"> Construction, maintenance and upgrade of water and wastewater infrastructure Pipe relining Operations based primarily out of Sydney 	<ul style="list-style-type: none"> Pipe liner suppliers Concrete and steel suppliers Quarries Office supply stores Hardware stores Contractors Specific equipment and/or materials as nominated by clients Plant and equipment hire suppliers
Abergeldie Complex Infrastructure Ltd (NZ)	<ul style="list-style-type: none"> General civil construction Construction of tunnels and shafts Operations based primarily out of Sydney 	<ul style="list-style-type: none"> Concrete and steel suppliers Quarries Hardware stores Office supply stores Contractors Specific equipment and/or materials as nominated by clients Plant and equipment hire suppliers
Abergeldie Structural Fabrications Pty Ltd	<ul style="list-style-type: none"> Fabrication of structural steel Operations based out of Sydney 	<ul style="list-style-type: none"> Steel Suppliers Hardware suppliers Office supply stores Contractors
Abergeldie Plant Pty Ltd	<ul style="list-style-type: none"> Management and hire of plant and equipment Operations based primarily out of Sydney 	<ul style="list-style-type: none"> Automotive requirements such as fuel, spare parts, vehicles, tyres which may be sourced from overseas locations Portable buildings Office supply stores Mobile plant and equipment suppliers
Abergeldie Personnel Pty Ltd	<ul style="list-style-type: none"> Hire of personnel Management of human resources Operations based primarily out of Sydney 	<ul style="list-style-type: none"> Uniforms and work attire Contractors Office supply stores
Joint Ventures	<ul style="list-style-type: none"> General Civil Construction Construction and maintenance of railway infrastructure Civil construction within railway corridor Construction of tunnels and shafts Construction, maintenance and upgrade of water and wastewater infrastructure Pipe relining 	<ul style="list-style-type: none"> Concrete and steel suppliers Quarries Hardware stores Contractors Specific equipment and/or materials as nominated by clients Office supply stores Plant and equipment hire suppliers



Abergeldie's commitment to building better communities goes beyond providing the complex infrastructure needed to build better communities, it is deeply embedded into our culture.

RISKS OF MODERN SLAVERY

Globally, around 7 percent of the workforce is employed by the property and construction sector and an estimated 18 percent of modern slavery victims are found in the construction industry. Significantly, at least 22 percent of forced labour victims are found in the manufacture and production of raw materials including in forestry, mining and quarrying – key suppliers for property and construction.

As the primary work of Abergeldie includes engineering and construction, we acknowledge the risks of modern slavery of supply channels and have accordingly undertaken a review of the potential for modern slavery practices across Abergeldie Group's operations and supply chains using our existing risk management processes and further incorporated and re-evaluated during Abergeldie's annual systems' review, or as required, during systems' management and general management meetings.

To improve our understanding of risks modern slavery and of exposure to issues such as corruption, we utilise tools such as the Global Slavery Index and Corruption Perception Index.



7% of the workforce is employed by the property and construction sector.



18% of modern slavery victims are found to be in the construction industry.



22% of forced labour victims are found in the manufacture and production of raw materials.

Location - Building materials are often sourced from high-risk locations, known to be associated with inadequate working conditions.

Local sector - The construction sector is one of several industries that has seen cases of forced labour exploitation in Australia, many of those identified as victims of labour exploitation were migrant workers who enter Australia to fulfil Australia's labour shortages.

There is an elevated risk of modern slavery within its operations and supply chains as a result of intersecting structural and contextual risk factors such as an increased demand for a low-skill workforce who are vulnerable to exploitative practices, and for raw materials that are often sourced from high risk locations.

COVID-19 - As construction increases beyond the COVID-19 pandemic, the vulnerability of low-skill and other vulnerable workers will be exacerbated, as the need to work, irrespective of conditions, intensifies.

Business model - Abergeldie's, and its supply chain's, business model is heavily reliant on outsourcing, which increases the complexity of operations and supply chains and reduces the visibility of labour risks and impacts.

The abundance of frequent short-term engagements, across multiple sites, often with small sized businesses, provides a challenge to facilitating a collaborative approach to risk management. The low margins almost always present in construction also introduce significant pressures on delivery for the supply chain.

Particular high risk areas identified include any overseas procurement, such as purchase of:

- Specific construction machinery not locally available
- Supply of clothing, PPE and other small mass produced items
- Specific machinery or materials specified to be provided in construction contracts

In addition to the above, general purchasing from Australian suppliers has been identified as a possible risk area where those suppliers procure some or all of their goods internationally and in a competitive environment where there is an influx of people seeking work.



BUILDING BETTER COMMUNITIES

Abergeldie has **zero tolerance** for any form of slavery or slavery like practice. We are choosing to take a proactive approach by creating and implementing initiatives with the goal of not only ensuring we comply with modern slavery requirements, but also our subcontractors and suppliers comply.



THE ABERGELDIE WAY

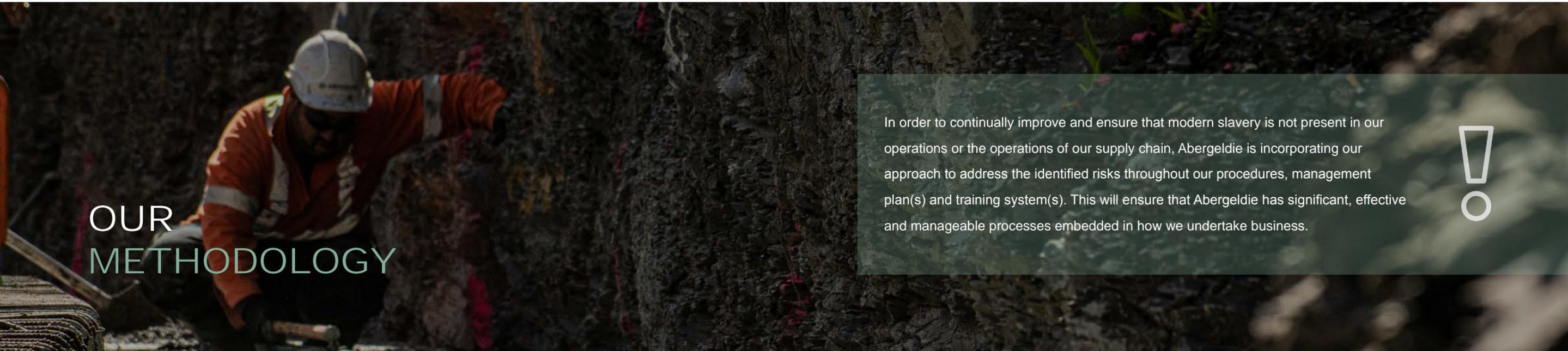
1. Abergeldie pursues the more complex projects.
2. We are serious about safety, quality and the environment.
3. We look for opportunities to innovate. We take initiative.
4. Abergeldie does what it says it will. We are dedicated.
5. We are a team that supports each other.
6. We celebrate success together.

EXISTING FRAMEWORK

Abergeldie has developed policies that continue to shape the way we behave and operate including ethics, corporate social responsibilities and whistleblower policies which are in unison with our procurement policy. Under the framework of our existing policies, management system and processes, we are already well placed to ensure that modern slavery practices within Abergeldie are unlikely to occur.

OUR VALUES

Abergeldie's purpose is to build better communities. We operate under the values of integrity, accountability, responsiveness, sustainability, teamwork, safety and mutual respect. It is under these values that what we call The Abergeldie Way has developed organically after 25 years of operation, setting the premise for our culture and the way we operate.



OUR METHODOLOGY

In order to continually improve and ensure that modern slavery is not present in our operations or the operations of our supply chain, Abergeldie is incorporating our approach to address the identified risks throughout our procedures, management plan(s) and training system(s). This will ensure that Abergeldie has significant, effective and manageable processes embedded in how we undertake business.



ASSESSING AND ADDRESSING RISK

Key to ensuring that Abergeldie is able to assess and address modern slavery risks is our due diligence program for supply chain procurement. Abergeldie takes a proactive approach to eradicating modern slavery risk from our supply chain. Our due diligence process is part of our broader procurement policy and is designed to identify and assess a range of potential risks in the supply chain, including human rights.

As part of our procurement process, all new suppliers, as well as renewing suppliers, are subjected to our due diligence process prior to onboarding or contract award.

Initially, suppliers are requested to complete a brief prequalification questionnaire managed in the Abergeldie Group procurement management system. This process helps us to identify potential areas of risk, and where identified, the supplier will be referred for further due diligence, which may include requiring the supplier to provide relevant policies and procedures or independent site audit reports to dispel any concerns.

We prefer, where possible, to work with suppliers to resolve issues instead of ending the relationship with the supplier to enable the proper dissemination of information and understanding of risks, such as modern slavery.

We understand that this will take time and Abergeldie Group is committed to working with its supply chain towards eradicating modern slavery from the construction industry.

Some additional measures Abergeldie has identified include:

- Developing a Modern Slavery Policy as part of its CSR Framework.
- Training / education, of not only all Abergeldie staff but also our supply chain.
- Internal auditing and enforcement of the requirements.

ASSESSMENT OF EFFECTIVENESS

Abergeldie will continue to review the effectiveness of measures implemented to mitigate the modern slavery risks identified into our existing monthly and annual review processes, which includes audits, trend analysis, re-risk assessments to ensure the implementation of our risk control measures is being carried out effectively.

CONSULTATION

Where Abergeldie held a “controlling interest” in an entity during the reporting period, we met with the appropriate organisational representative to frame our expectations, raise awareness and understand their approach in mitigating modern slavery risks. Where Abergeldie did not hold a “controlling interest” (such as in the joint venture entities), but they were nonetheless an entity in which we held a minority equitable interest, we communicated our expectations and offered our assistance where they required further guidance.

We further worked with our legal team to embed modern slavery considerations into their due diligence and commercial/contractual processes.

Over the next year, our key focus areas will be consultation with all relevant stakeholders to further determine the effectiveness of the control measures implemented and to also incorporate any additional risks or control measures identified by the stakeholders into our assessment meetings so that they may assist in continually improving Abergeldie’s approach.

CONCLUSION

Abergeldie is committed to operating responsibly and adhering to ethical and social standards. We reject any activities that may cause or contribute towards modern slavery practices and are striving to eradicate all forms of modern slavery globally. Looking forward, we will continue working with our supply chain to improve processes remain effective in identifying, preventing and/or mitigating modern slavery as underpinned by our purpose to building better communities.





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COMPLEX INFRASTRUCTURE

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