

Modern Slavery Statement 2023

GROSVENOR]
engineering group

Foreword

This Modern Slavery Statement has been made by Grosvenor Engineering Group (GEG), pursuant to Section 16 of the Modern Slavery Act 2018 (Cth) for the period 1 July 2023 to 30 June 2024. Entities covered within GEG include:

- Grosvenor Engineering Group Pty Ltd [ABN 12 003 608 795]
- Grosvenor Engineering Group (QLD) Pty Ltd [ABN 65 650 298 481]
- Grosvenor Engineering Group NZ Limited [Company No. 8191460]
- SYNTRIC Pty Ltd [ABN 67 096 741 687]
- Apeiron Research & Technology Pty Ltd [ABN 83 154 849 528]

During the reporting period this statement covers, we actively engaged and consulted with all companies we own or control in the development of this statement (entity's outlined above). We discussed details of the Modern Slavery Act 2018's reporting requirements; information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.

GEG has zero tolerance to Modern Slavery and continues to encourage the same commitment from all our suppliers. The statement outlines the steps taken by GEG in identifying and addressing Modern Slavery risks to our operations and supply chain. Throughout Financial Year 2023 (FY23), we continued the process of having our suppliers submit a declaration by completing the GEG Modern Slavery Questionnaire. The data enables us to identify potential Modern Slavery risks and further consult with our suppliers in better understanding the issues.

To further improve the integrity and quality of our supply chains, we have reviewed our Modern Slavery risk framework with the objective of conducting suitable risk assessment, grading them, and prioritising them by their relative importance, to reduce the likelihood of occurrence of possible Modern Slavery breaches. The GEG Modern Slavery Questionnaire has been implemented in FY23 as an addendum to our Supplier Code of Conduct and continues to be used in Financial Year 2024 (FY24).



Nicholas Lianos

CEO & Managing Director

09 August 2023



Peter Souflias

Executive Director

09 August 2023

Purpose and Values

Our purpose is to enrich people’s lives by transforming the built environment. Our values include:



Safety

We are relentless about ensuring everyone returns home safe and well every day.



Agility

Our data enables us to be curious, proactive and deliver the best outcomes.



Balance

We encourage everyone to find their own ideal balance between work and life.



Partnerships

Diverse backgrounds, thinking and skills, working together, make us a force to be reckoned with.

Our Corporate Social Responsibility

We believe in making a difference and are committed to working and acting in a socially responsible manner towards each other and all those with whom we interact. We strive to behave ethically at all times, to contribute to economic development while improving the quality of life of our employees and their families as well as our local community and society at large.

Audits

Our auditors consistently capture data on each asset and can customise maintenance schedules to suit asset lifecycle and individual requirements. Unique asset identification allows our technicians and engineers to inspect, test, maintain and report on each asset individually.



Sustainability

We specialise in the maintenance of Operational Technology equipment and systems that run the building in the background. Our Sustainability Engineers can make recommendations to ensure that optimal environment, economic and social improvements for the building or property can be achieved.



HVAC Engineering Design

Our dedicated Engineering Design team support with HVAC refurbishments and construction projects – upgrading and/or retrofitting old and obsolete HVAC assets – significantly improving the buildings performance, energy efficiency and occupant comfort.



With a footprint of 21 branches across Australia and New Zealand, our clients are supported by a workforce of over 800 employees which include specialist engineers, technicians, project managers, estimators, site personnel, and service specialists.



21

Branches
across ANZ



**1.4+
Million**

Technical assets
under management



800+

Talented
Employees



19,000+

Properties
serviced

Supply Chain

We understand that Modern Slavery, including those related to human trafficking, slavery and slavery-like practices can occur in every industry and sector and have severe consequences for victims. We also recognize that human rights are an area of growing importance to our employees, shareholders, and customers. GEG is committed to identifying and minimising Modern Slavery risks, especially when it is happening in our supply chains.

In FY23, GEG's total high-risk supplier spend was over \$25.8 million. GEG has partnered with 2,275 suppliers in FY23 across all our operations, development, and corporate functions. This includes below high-risk supplier categories:

Category	Sum of Sum of Approved Cost
Building & Construction	\$24,843,123.01
Cleaning & Security Services	\$117,180.48
Events & Event Management (Conferences/Marketing)	\$335,994.14
Food & Catering Services	\$27,786.03
Furniture and Office Supplies	\$230,320.47
Uniforms & PPE	\$233,618.13
Waste Management Services	\$79,194.13
Grand Total	\$25,867,216.40

As GEG operates only in Australia, most of our procurement spend (by value) with suppliers with which we have a contractual relationship (Tier 1 suppliers) are Australian. We recognise that these suppliers may procure materials and services from outside of Australia and therefore some companies in our supply chain are domiciled internationally, especially Tier 2 suppliers (i.e., suppliers of the Tier 1 suppliers) and further tiers.

Modern Slavery Risk Framework

GEG Modern Slavery framework is based on a risk management approach with the objective of ensuring compliance and continual improvement. We have implemented policies and procedures to enforce ethical and legal practices in alignment with our values. They also promote protection of human rights of employees, contractors, business partners, suppliers, clients, and the communities within which we operate.

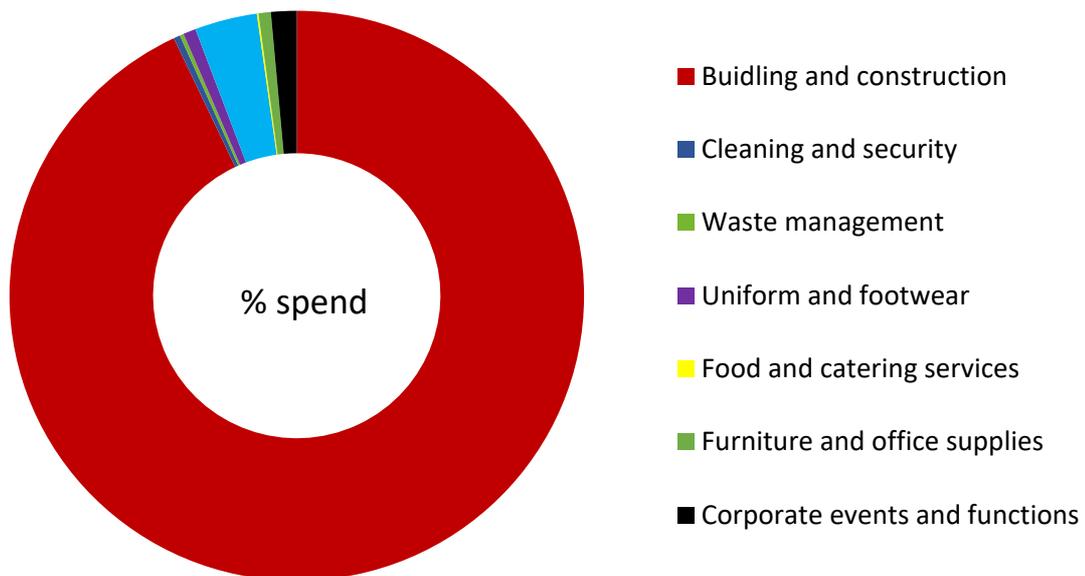
Responsible Sourcing

At GEG we uphold high moral, ethical and sustainable business practices. Our company is dedicated to protecting human rights. We are a committed equal opportunity employer and will abide by all fair labour practices. We'll ensure that our activities do not directly or indirectly violate human rights in any country. To ensure that we partner with suppliers who have similar values and respect safe, fair, and sustainable working environments, we have introduced a number of guidelines that set out the standards by which we will engage with suppliers. These standards also ensure GEG meets their obligations as set out in the Modern Slavery Act 2018.

Due Diligence

GEG actively works with stakeholders to identify and understand the impact of its activities and limit any negative impact. Due diligence is exercised to prevent and mitigate adverse impacts as we seek to only do business with suppliers that have similar values and respects a safe, fair, and sustainable working environment. Through the responses received in our Modern Slavery Questionnaire, GEG records and evaluates the risks associated with above Modern Slavery risk factors.

Typical high-risk categories identified within GEG supply chain include:



Actions to address Modern Slavery risks

Supplier Code of Conduct

GEG views its suppliers as partners. Our Supplier Code of Conduct sets out the minimum standards of behaviour that we expect our suppliers to meet in the areas of labour and human rights, non-discrimination, bullying, harassment and discrimination, wages, benefits, working hours, workplace health and safety, environment, business integrity, privacy, and supplier diversity.

GEG management of Modern Slavery falls within its overall approach to protecting human rights and is guided by our Supplier Code of Conduct document. This document outlines GEG expected standard of behaviour and conduct from our suppliers and what we stand for as an organization. All GEG suppliers must have read and understood the document provided. In addition to suppliers complying with GEG Suppliers Code of Conduct, we expect our suppliers to require their own suppliers to comply with similar principles to those outlined in our Supplier Code of Conduct. These principles operate in conjunction with our values and our need for a safe, fair, and sustainable working environment, including those relating to human rights.

Supplier Onboarding

GEG has incorporated our Modern Slavery Statement into our “Request for Pricing” process so that future or potential suppliers are aware of our stand and position on this subject. We have incorporated our Modern Slavery position into our “New Supplier Request Form” so that each new supplier is properly advised. In FY22 we extended the requirement of participation in completing our GEG Modern Slavery Questionnaire to all our suppliers with the objective of creating awareness on Modern Slavery and identifying practices that constitute Modern Slavery. The data enables us to identify potential Modern Slavery risks and further consult with our suppliers in better understanding the issues.

Where appropriate, potential suppliers are required to provide additional information to address our concerns on human rights and Modern Slavery risk. This includes information regarding how those risks are mitigated and managed by their organisation. In addition, all suppliers are required to acknowledge GEG Supplier Code of Conduct, which outlines our commitments in this area and our expectations of their conduct in maintaining human rights standards including the elimination of child, bonded, forced or involuntary labour in accordance with international and domestic best practise. Where a potential supplier is not able to demonstrate their compliance with these requirements, they will not be permitted to conduct trade with us.

The Modern Slavery provisions also require suppliers to notify GEG if they become aware of an instance of Modern Slavery in their supply chain. As per our Modern Slavery policy statement, a breach of these Modern Slavery provisions may result in GEG terminating the contractual arrangement.

Desktop Supplier Assessments

In FY21, we had conducted an evaluation of 25 key supplier representing our top 25 high annual spend, with No Modern Slavery risks identified. In FY22, we extended the completion of the GEG Modern Slavery questionnaire to all our suppliers. In FY23, GEG partnered with 2,275 suppliers with a total spend of over \$25.8 million to deliver its activities in Australia.

Risk Assessment

In FY22, 1,906 suppliers were involved in the risk mapping exercise. Suppliers were assessed for risk based on the four identified Modern Slavery risk factors and in alignment against our Code, and our policies, through their responses to our GEG Modern Slavery Questionnaire at onboarding and throughout the procurement lifecycle. Seven suppliers were identified as participating in high-risk industries across GEG supply chain. We have reviewed their responses from the Modern Slavery questionnaire and reached out to clarify by providing additional information to address our concerns on human rights and Modern Slavery risk. This includes information regarding how those risks are mitigated and managed by their organisation. GEG is satisfied with the response and no Modern Slavery risks were identified.

Key Policies

GEG is committed highest standards of ethical behaviours in the conduct of our business dealings. We have a range of policies and procedures implanted to outline the standard of behaviour expected of our directors, employees and contractors. A summary of the key policies relating to our management of modern slavery is set out below.

Policy	Description
Supplier Code of Conduct	This code sets out the minimum standards that we expect our suppliers to meet in the areas of labour and human rights, non-discrimination, bullying, harassment and discrimination, wages, benefits, working hours, workplace health and safety, environment, business integrity, privacy, and supplier diversity.
Whistle-blower Policy	This policy sets out our commitment to identifying and addressing misconduct, including suspected or actual contraventions of human rights, and encourages the reporting of such conduct safely, securely and without fear of detriment. Throughout the reporting period, an independent hotline was available for the reporting of misconduct with processes in place for the investigation of those reports.
Diversity Statement	This statement sets out our commitment to creating and promoting a fair and inclusive workplace promoting diversity, inclusion and equal workforce participation.
Sustainable Procurement Statement	This statement outlines our strong belief in the advantages of sustainable procurement and seeks to contribute positively to society and the economy through making sustainable purchasing decisions and encouraging our suppliers to do the same.
Code of Conduct	This code outlines standards of behaviour for all employees that promotes GEG Core Values.
Bullying & Equal Employment Opportunity (EEO) Policy	This policy sets out our commitment to creating and promoting a fair and inclusive workplace

	promoting diversity, inclusion and equal employment opportunities.
Anti-Bribery and Anti-Corruption Policy	This policy sets out our zero tolerance of bribery and corruption and outlines the expectations of directors, employees and third parties to act in accordance with this policy and not engage in any form of bribery and corruption.

Remediation

GEG is committed to remediating any identified instances of human rights and Modern Slavery abuse in our operations and supply chain that may arise. Our Policies and procedures such as our Whistle-Blower Policy, Bullying & Equal Opportunity Policy, etc. provide a framework within which our workforce can raise concerns and grievances which will be managed fairly, independently and impartially. Where non-conformances or risks of Modern Slavery are identified within our supply chain, GEG will partner with the supplier to further evaluate the matter and implement a corrective action plan, while agreeing on timelines and review mechanisms to ensure compliance.

ESG Compliance

To demonstrate our commitment to all stakeholders on managing Modern Slavery risks and on implementing a sustainable business model, GEG has registered with EcoVadis that facilitates evaluation of a business sustainability rating for Environment, Ethics, Labour and Human Rights, and Sustainable Procurement on a common platform, using universal scorecard, benchmarks, and performance improvement tools. This rating can also be shared with other stakeholders.

Ongoing Risk Mitigation Measures

GEG shall review its Modern Slavery questionnaire and align it to our improved governance process. Data obtained from the responses to the questionnaires shall be evaluated to objectively identify Modern Slavery risks. We will continue to work with our suppliers towards ascertaining these risks and resolving issues.

Consultation

GEG Board of Directors endorse this Modern Slavery Statement. GEG communicates our Supplier Code of Conduct, Sustainable Procurement and Modern Slavery Statement company wide. We also make these document available on our employee intranet and made available as part of the employee induction process.

Supplier Engagement

GEG has incorporated our Modern Slavery Statement into our “Request for Pricing” and “New Supplier Request” process, to ensure future or potential suppliers are aware of GEG’s expectations in relation to Modern Slavery. As such, we have incorporated the requirements of our Modern Slavery Statement into our “New Supplier Request Form”.

GEG will continue to engage with its suppliers to ensure that they are continuously focused on reducing potential risks within their supply chain and are committed to taking immediate action to address the potential risks.

Looking Forward

To further strengthen our commitment in addressing Modern Slavery risks within our supply chain and operations, we will continue to review and further improve our processes and frameworks.

GEG will set an improved governance framework that will continue to strengthen our ability to identify, assess and address Modern Slavery risks, and reinforce our due diligence.

We will review and update our policies, practices, and procedures, as required, to maintain appropriate safeguards against breaches to Modern Slavery and Human Rights legislation within our supply chain and ensure all necessary steps to assess and address Modern Slavery risks in our operations and supply chains, particularly through further engagement with key suppliers.

Throughout FY24, GEG will focus closely on the below:

- Maintain ongoing engagement with suppliers to minimise and mitigate Modern Slavery risks that may be associated within our supply chain.
- Engage with EcoVadis to strengthen our organisation's focus and commitment on Environment, Ethics, Labour and Human Rights and Sustainable Procurement.
- Schedule training and awareness programs for both internal as well as external stakeholders.
- Look beyond our Tier 1 suppliers and extend our supply chain mapping to other geographies beyond Australia.

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