



# A GUIDE TO MODERN SLAVERY

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# What is modern slavery?

Modern slavery is an umbrella term for situations in which a person is forcibly or subtly controlled by an individual or a group for the purpose of exploitation.

Some examples of modern slavery include:

- forced labour
- illegal forms of child labour
- human trafficking
- debt bondage
- deceptive recruiting for labour
- exploitation of minimum wage requirements.

# What is the Modern Slavery Act ?

- The Commonwealth *Modern Slavery Act 2018* (the **Act**) entered into force on January 1, 2019, and established a national Modern Slavery Reporting Requirement (the **Reporting Requirement**).
- Entities with an annual consolidated revenue of at least AUD\$100M, such as the SGSP (Australia) Assets Pty Ltd group of companies (our **Group**), including Jemena and Zinfra, are required to comply with the Reporting Requirement.
- To comply with the Reporting Requirement, our Group must submit annual Modern Slavery Statements which are publicly available through an online register, managed by the Federal Attorney-General's Department [*Modern Slavery Register*].



# What is our Group doing to manage and reduce our modern slavery risk?

- Our [Code of Conduct](#) outlines the expected standards of behaviour that applies to all employees, contractors, and suppliers within our Group. This Code reflects our dedication to the well-being of individuals across our operations and supply chains.
- We also routinely distribute supplier assessment questionnaires (**SAQs**) to our suppliers through the Informed 365 platform. These questionnaires allow our Group to understand the risk in our supply chain, and how to collaborate with suppliers to tackle any likelihood of modern slavery.
- We publish our annual commitment statements on our [website](#) and on digital platforms such as [LinkedIn](#).
- Our contracts and purchase order terms and conditions reflect our commitments and compliance under the Act.



# Examples of possible risks of modern slavery

The table below summarises some of the key risk areas you *may* experience in your supply chain. It is adapted from the annual Modern Slavery Statement for our Group and is not an exhaustive list:

Supply Chain Category*	Type	Description of Key Risk Areas
Corporate Services	Cleaning Services	Low visibility over labour practices given service happens after hours.
		Low visibility over contractor practices, (wages, working hours) can exacerbate threat.
	Office Services and Supplies	Potential lack of labour practices and transparency of manufacturing processes.
		Potential for limited visibility of offshore labour practices.
	Clothing and Workwear	Potential lack of labour practices and transparency of manufacturing processes.
Logistics	Risk associated with international logistics and labour practices.	
Digital	Information Technology and Communications Materials	Potential for limited visibility of offshore labour practices.
	Information Technology and Communications Services	
Asset Maintenance Services	Engineering Services	Temporary nature and skill levels present risks.
	Construction Services	
Equipment and Materials	Construction, Maintenance and Repair materials	Raw materials extraction and labour practices visibility.

\*Edge Impact's Modern Slavery industry classifications

# Ways of Working Together

Here are some ways we can work together to identify and address any real, potential or perceived risks in your supply chain:

1. Read our annual [Modern Slavery Statement](#) and raise any questions you might have with us.
2. Be prepared for modern slavery to be included as an evaluation criteria when assessing tender submissions and responses to Requests for Quotations.
3. During a tender, Requests for Quotations, or as part of our annual reporting, we routinely distribute an SAQ through our Informed 365 platform. It is important you complete the questionnaire to the best of your abilities if you receive this invitation from us.
4. When participating in simple Request for Price activities, the expectation is that by submitting a response, you have read and understood our current Modern Slavery Statement.
5. When engaging in conversations with us about modern slavery, be open and collaborative. Our objective is to have honest and two-way conversations.
6. Ensure your SAQ is refreshed annually to capture any new risks or changes in your supply chain.
7. Inform us as early as possible if you identify a new risk outside of your reporting cycle.

# Supplier Assessment Questionnaire information

**You may receive an email invitation from us at any time to complete an SAQ on our Informed 365 platform:**

- Remember, the questionnaire helps us work together to identify and address any real, potential or perceived risks in your supply chain.
- If your organisation has not yet started assessing modern slavery risks in your supply chain, that's ok. Together we can get the ball rolling – the first step is completing the questionnaire.
- All responses to the questionnaire are valid, as the focus is to establish a baseline to identify and agree on next steps together (if any).
- Identifying and addressing modern slavery risks is an ongoing global responsibility, and the annual questionnaire is just one of the ways we will maintain a conversation with you on this topic.



# Informing Us

If you suspect there is a real, potential, or perceived modern slavery risk in your supply chain, here are the steps you can take to keep us informed:

1. [Contact our Procurement team](#) and email us with information about:
  - The name and number of the contract and/or project you are working on with us.
  - The name of your business or operational representative/s.
  - The type of services you provide to us i.e., service provider, manufacturer etc.
  - The risk/s you have identified in your supply chain.
2. To make a report in confidence, refer to our Group's [Whistleblower Policy](#). It protects people who wish to raise concerns about actual, suspected, anticipated, unlawful or unethical behaviour relating to our Group.



# Key Takeaways

- [Contact Procurement](#) or follow our Group's [Whistleblower Policy](#) if you suspect any modern slavery risk that may impact our businesses.
- During a tender, Requests for Quotations, or as part of our annual reporting, we routinely distribute an SAQ through our Informed 365 platform. It is important you complete the questionnaire to the best of your abilities if you receive this invitation from us.
- Our annual [Modern Slavery Statement](#), [Code of Conduct](#) and Group's [Whistleblower Policy](#) are available from our [website](#).



# We thank you for taking the time to read this information pack.

Our supplier relationships are important to us. We are committed to the highest standards of corporate responsibility, particularly our health, safety and environmental obligations, including ethical behaviour, human rights and social responsibilities.

Here are some useful resources to continue the conversation:

[SGSPAA Modern Slavery Statement](#)

[Email the Procurement Team](#)

[Contact us about completing an SAQ](#)

[Access our Group Whistleblower Policy](#)