

Modern Slavery Policy

Prepared by Jamie Little

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COMPETENCY
CAPACITY
COMMITMENT



Modern Slavery Policy

A. Definition

The *Modern Slavery Act 2018* (Cth) ('**Act**') defines Modern Slavery as human trafficking, slavery and slavery-like offences pursuant to Divisions 270 and 271 of the *Criminal Code Act 1995* (Cth), inside or outside of Australia.

Modern Slavery can occur in various forms and involves deprivation of the liberty of a person for the financial (or other) gain of another person, such as:

- Servitude
- Forced or compulsory labour
- Human trafficking

B. Coverage

This Policy applies to all employees, contractors, subcontractors, sub-consultants and suppliers of BG&E Resources Pty Ltd ABN 94 628 465 056 and its related entities, together '**BGER**'.

This Policy states how BGER is complying with the Act through ethical and sustainable business practices.

C. Structure

BGER is a privately owned multi-disciplinary design engineering consultancy operating across Australia, with headquarters in Perth and offices in Brisbane, Mandurah and Newcastle.

From mining, ports, marine and industrial projects to renewables, BGER produces world class design engineering to help clients optimise the performance of assets and improve productivity and safety. We design state-of-the-art facilities, connect facilities to transport infrastructure, and create local employment opportunities and sustainable outcomes for communities.

The majority of our workforce comprises skilled, salaried professional personnel. BGER typically employs specialist subconsultants to provide professional services in particular areas of expertise such as geotechnical engineering, environmental engineering and surveying. BGER engages a range of suppliers in its supply chain, to provide ancillary and support services including cleaners, provision of equipment and ICT software/services. These personnel are all paid at, or above, market rates in accordance with prevailing employment laws.

D. Risks

With no factories or work sites of its own in any country outside of Australia, BGER is at low risk of causing Modern Slavery. The risk that BGER's workforce is exploited is low: worker's rights are respected, workers are free to refuse or cease work, and workplaces are safe and regulated in accordance with Australian laws.

Businesses in BGER's supply chain are predominantly located in Australia and subject to the same laws as BGER. BGER is not aware of any existing Modern Slavery risks in its operations or supply chain.

E. Approach

BGER complies with its client policies in relation to Modern Slavery in all contractual relationships.

BGER expects its employees and contractors will comply with this Policy and to also comply with our client Modern Slavery policies.

Any breaches of our client or supplier agreements under this Policy will be referred to the Executive Leadership Team and Head of Commercial for investigation and potential remediation actions.

F. Policies

BGER has policies which together with this Policy, support our ethical business operations and address the potential risks of Modern Slavery within the company's supply chain. These include:

1. **Anti-Bribery and Corruption Policy** and practices.
2. **Recruitment Policy** and practices.
3. **Code of Business Conduct**: how we aim to behave as an organisation and how we expect our employees and suppliers to act.
4. Our **Grievance and Dispute Resolution** and **Whistleblower Policies** allow employee concerns to be raised, identified and addressed.
5. **Employee Onboarding**: how employees can raise concerns about how colleagues are treated, or practices within our business or supply chain, without fear of reprisals.
6. **Procurement Policy**: process and principles for engagement of BGER's supply chain.

G. Actions

To implement this Policy, BGER will:

1. Question potential clients and suppliers about Modern Slavery risks before engagement;
2. Enter transparent and formal contracts with suppliers rather than utilise informal arrangements;
3. Request that suppliers comply with Modern Slavery laws and cascade their legal obligations through their supply chains;
4. Provide training if necessary to employees about the Act;
5. Monitor compliance with the Act within its business and internal systems, processes, and reporting requirements; and
6. If suspected breaches of this Policy are identified, investigate and potentially terminate commercial relationships if the breach is not rectified satisfactorily.

H. Performance Indicators

BGER is committed to continuous improvement of its Modern Slavery Policy and practices and assessment of its Modern Slavery risks.

BGER will assess the effectiveness of the Policy through:

- Modern Slavery reviews of, or notifications from within, its supply chain
- whistleblowers
- internal reviews of BGER's business operations
- public or legal enforcement agencies which indicate Modern Slavery practices have been identified

I. Contact

For further information about this Policy, please contact BGER's Head of Commercial, Jamie Little- jamie.little@bge-resources.com

Craig Bloxham
Managing Director

Document Control				
Revision	Date	Prepared	Reviewed	Approved
1	14/11/2022	Jamie Little	ELT	Craig Bloxham