

## Modern Slavery Policy

Ref. Number:  
**WAT-HR-POL-46**

### 1. Purpose

This policy outlines BESIX Watpac's commitment to the identification and elimination of modern slavery from its operations and supply chain.

### 2. Scope

This policy applies to all BESIX Watpac workers including employees, contractors, subcontractors, consultants and their employees, and all other persons that are conducting work on BESIX Watpac site or office.

This policy should also be read in conjunction with the Sustainable and Responsible Procurement Code of Conduct and International Framework Agreement on fair labour standards dated 14 December 2017.

### 3. Policy

#### 3.1 Policy Commitment Statement

BESIX Watpac is committed to be compliant with its obligations under the *Modern Slavery Act 2018* (Cth) and *Modern Slavery Act 2018* (NSW) and any replacement Act/s and Regulation/s and relevant State Act/s and Regulation/s enacted from time to time (**the Acts**), in carrying out its activities on all building project sites ("sites") and as such:

- Expects all employees, contractors, subcontractors, consultants and their employees to be similarly compliant;
- Shall provide access to this policy;
- Shall provide the necessary training to employees and induction to other BESIX Watpac workers to ensure awareness of this policy and their obligations under the Acts; and
- Shall promote appropriate standards of conduct in respect of the Acts and this policy at all times.

#### 3.2 Responsibilities

BESIX Watpac is required to identify the risks of modern slavery practices in its operations and supply chains and take reasonable actions to assess and address those risks, including due diligence and remediation processes.

BESIX Watpac requires its employees, contractors, subcontractors, and consultants to ensure that their conduct does not breach the Acts. Any form of modern slavery within BESIX Watpac's operations or supply chain will not be tolerated.

#### 3.3 Complaints and Grievances relating to this Policy

All BESIX Watpac employees, contractors, subcontractors, consultants and their employees are encouraged to inform BESIX Watpac about any grievance or complaint they may have regarding any breach to this policy. They are requested to notify:

1. BESIX Watpac site management; or
2. A BESIX Watpac Operations Manager; or
3. Chief People Officer.

## Modern Slavery Policy

Ref. Number:  
**WAT-HR-POL-46**

This will ensure that:

- All complaints are treated in a sensitive, fair, timely, safe and confidential manner; and
- Complainants are protected from victimisation or reprisals.

### 4. Reporting

BESIX Watpac is required to prepare a modern slavery statement annually and provide same to the Minister/Commissioner, describing the risks of modern slavery in its operations and supply chains, and the actions taken to address those risks.

Contractors, subcontractors and consultants required under the Acts to prepare and provide a modern slavery statement annually must do so, and BESIX Watpac encourages those contractors, subcontractors and consultants that are not required to voluntarily prepare and provide a modern slavery statement annually.

BESIX Watpac also encourages all BESIX Watpac workers including employees, contractors, subcontractors, consultants and their employees to report any concerns regarding modern slavery or breaches of the Acts to the Minister/Commissioner.

### 5. Definitions

**'Modern Slavery'** includes, but is not limited to, conduct such as slavery, slavery-like conditions, trafficking in persons, debt bondage, and child labour.

### 6. Further Information

For further information and/or clarification of this Policy please see BESIX Watpac Site Management, BESIX Watpac Operations Manager, or the People Team.

Version	Date	Revision Description	By Name
Rev 1	8/8/2019	New Policy	Angela Liebke
Rev 2	18/08/2020	Rebrand and definition update	Angela Liebke

Position	Name	Signature	Date Signed
Prepared By	Angela Liebke Chief People Officer		25-08-20
Approved By	Jean-Pol Bouharmont Chief Executive Officer		
Version Number	2		