

# MODERN SLAVERY STATEMENT

1 July 2022 to 30 June 2023

# CONTENT

Acknowledgement of Country	3
About this Modern Slavery Statement	4
Introduction	4
Message from our CEO	5
Organisational structure, operations and supply chain	6
Potential risks in our operations and supply chains	8
Addressing the risk of modern slavery practices	10
Assessing effectiveness	12
Future commitments	12



## Acknowledgement of Country

In the spirit of reconciliation, Gamuda acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea and community.

We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples with us today.

# MODERN SLAVERY STATEMENT

## About this Statement

This Statement sets the position and actions taken by Gamuda (collectively Gamuda (Australia) Branch ABN 27 632 738 768 and Gamuda Engineering Pty Ltd ABN 36 636 433 522 and Gamuda Holding Pty Ltd ABN 81 665 763 020) in relation to modern slavery risks in Gamuda's business and supply chains in the year ending 2023, pursuant to the requirements of the Modern Slavery Act 2018 (Cth).

This Statement covers the reporting period 1 July 2022 to 30 June 2023 and has been prepared to meet the mandatory criteria structure as outlined in the Guidance for Reporting Entities: Commonwealth Modern Slavery Act 2018.

This Statement does not apply to Gamuda's non-controlled joint ventures, nor does it apply to entities in which Gamuda has an interest but are required to report in their own right under the Act, such as Tunnelling Solutions and DT Infrastructure.

In preparing this Statement, members of Gamuda's Senior Leadership Team, including the Chief Executive Officer, Head of Procurement, Head of Human Resources, General Counsel, and Head of Environment and Sustainability were actively engaged and consulted as were the relevant business units.

This was undertaken by (i) collaborating with the relevant business units, entities and boards to provide an overview of the Modern Slavery Act 2018's reporting requirements, (ii) providing information regarding the actions we intend to take to address these requirements, including relevant updates, and (iii) seeking feedback from relevant business units, entities and the Management Board with respect to modern slavery matters. This report is the consolidation of the outputs from those efforts.

This statement was approved by the board of Gamuda (Australia) Branch ABN 27 632 738 768 and Gamuda Engineering Australia ABN 36 636 433 522) on 24 of June 2024

## Introduction

Access to fair, ethical and safe working conditions is a basic human right and one which promotes a sustainable life for all workers. As an employer, Gamuda seeks to develop its systems to ensure the human rights of our employees and stakeholders are respected in line with the United Nations Guiding Principles.

Gamuda is committed to ensuring that all business is conducted according to ethical, professional, and legislative standards in a fair, honest and open manner. We continuously look to implement and enforce effective systems and controls to ensure that we fully comply with the Modern Slavery Act 2018, in relation to all business activities.

Slavery and human trafficking can occur in many forms, including slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

The purpose of this Statement is to detail Gamuda's commitment and actions to identify, address, and prevent modern slavery within our operations and supply chains.

Gamuda upholds high standards of conduct and welcomes feedback from affected parties to improve our due diligence practices within our operations and supply chains. If you have concerns about modern slavery, potential human rights issues, or unethical behaviour in our operations or supply chain, we strongly encourage you to contact us. Your input is valued, and your right to anonymity protected.

Any person may make a disclosure of improper conduct that concerns Gamuda to the Head of Human Resources or General Counsel via email at [legal@gamuda.com.au](mailto:legal@gamuda.com.au).

# A MESSAGE FROM THE CEO

As an employer of choice and responsible global company, we believe that access to fair, ethical and safe working conditions is a basic human right.

For Gamuda in Australia, our values—take personal ownership, walk the talk, adopt open and honest communication, demonstrate real teamwork, and develop our people—form the foundation of our human rights commitment.

Our human rights due diligence processes are integral to our operations, guaranteeing that our business activities align with the highest ethical standards and international human rights principles. As part of this our systems have been developed to identify, address, and prevent modern slavery within our operations and supply chains, and they are constantly evolving. Underpinned by our company values, we are committed to creating an ethical and vigilant company culture that prioritises the dignity and well-being of every person within our company's operations, partnerships and supply chains. This is endorsed and championed by our Management Board and Senior Leadership Team.

Our company policies and procedures, digital procurement process, industry partnerships and ongoing training and development of our people (extended to those we do business with) ensures we conduct our business in an open, honest and ethical manner. In doing so, our procurement standards address both modern slavery and act to ensure equal opportunity is accessible to all.

This way of doing business has resulted in an increased focus on engagement and investment in social enterprise and indigenous businesses – where we have exceeded expectations on our project commitments to further support the communities in which we operate.

Over the years, I am proud to have seen Gamuda make great strides in embedding strong policies that set out clear expectations for our people, subcontractors and suppliers, as we strive to eradicate human rights abuse and modern slavery from our business and those connected to it.



A handwritten signature in white ink that reads "Ewan Yee". The signature is stylized and fluid.

**Ewan Yee**  
Chief Executive Officer

---

## Gamuda values

### Take personal ownership

A-card holders must take charge and deliver

### Walk the talk

Show the right values and be a role model

### Adopt open, honest communication

Discuss, resolve and move on

### Demonstrate real teamwork

Break silos, work together across divisions

### Develop our people

Be passionate about developing people

# ORGANISATIONAL STRUCTURE

Gamuda is part of Gamuda Berhad, a globally recognised engineering, property and infrastructure business founded in 1976. Gamuda Berhad operates in nine key countries which includes Malaysia, Australia, United Kingdom, Vietnam, Taiwan, Singapore, India, Qatar and Bahrain.

The image below shows the group’s organisational structure.

Gamuda was established in Australia in 2019 and focuses on the core business of infrastructure design, construction, operation, and maintenance. Areas in which we operate include roads, bridges, tunnelling, rail, dams and energy.

As of 2023, Gamuda Berhad had a total of 4,219 employees globally, and the group revenue was reported as worth a total of RM9.1 billion with total earnings of RM1.8 billion.

Our vision is to become a leader in the Australian infrastructure and construction sector by offering innovative, breakthrough and dependable solutions for large scale public infrastructure projects and private investment opportunities.

Our strength lies in our ability to identify, innovate, and deliver breakthrough engineering solutions to improve the standard of living for the communities in which we operate.

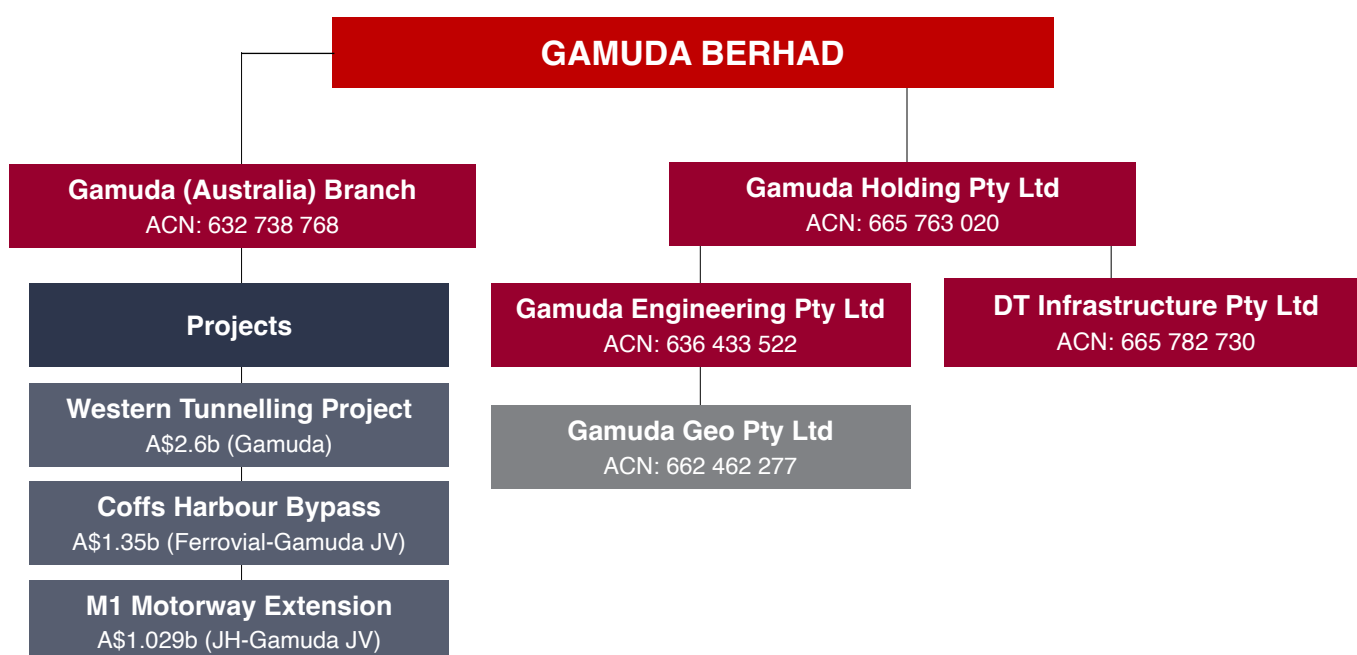
Gamuda also undertakes a range of joint venture activities and alliances which relate to construction projects in Australia.

## Our employees

At the close of the FY23 reporting period, Gamuda had a total headcount of 431 comprising of 373 full-time employees, 23 part-time employees and 35 contractors across our offices in Sydney and Melbourne including major projects in Western Sydney, Coffs Harbour and Newcastle. Independent contractors and consultants with specialist skill sets are employed on a temporary part-time or full-time basis depending on the requirements of the business. Contractors and consultants are employed for a defined period under an Independent Contractor Agreement.

Full-time	373
Part-time	23
Independent Contractors/Consultants	35

Statistics in this table relate to the business at 30 June 2023



Gamuda Berhad's Australian Organisation Structure

# OPERATIONS AND SUPPLY CHAIN

## Our projects

During the FY23 reporting period Gamuda was involved in the delivery of three major projects in New South Wales, Australia:

- Sydney Metro West - Western Tunnelling Package
- Coffs Harbour Bypass
- M1 Extension – Raymond Terrace to Box Hill

## Our supply chain

In FY23 Gamuda engaged with over 1,125 suppliers, both domestic and international, including 35 Aboriginal businesses equating to a spend of \$14.7 million spent with Aboriginal businesses.

The overall key goods and services that were procured by Gamuda in FY23 included:

- Specialist consultants such as designers, environmental and sustainability experts
- Professional services such as legal and commercial property management
- Technology services and hardware suppliers
- Specialist subcontractors for undertaking works on our projects, such as civil, structural, building, electrical and mechanical
- Suppliers of specialist plant and equipment such as excavators, trucks, utes and cranes
- Suppliers of goods and materials relating to construction projects, such as steel and concrete
- Service providers such as labour hire, landscaping and cleaning
- Support services for construction projects, such as waste management



Location of Gamuda's corporate offices in Australia and current infrastructure projects.

# POTENTIAL RISKS IN OUR OPERATIONS AND SUPPLY CHAINS

Globally, it is estimated that 18% of modern slavery victims are found in the construction industry. ([Source: KPMG report](#)) This is comparatively high compared to other industries, due to the high demand for low-skilled labour, poor visibility over supply chains and suppliers operating in high-risk geographies.

As Gamuda continues to grow within the Australian market, the potential risk to modern slavery within our operations and supply chain will increase. This means we must identify potential risks from the onset, ensuring we have the right framework implemented to continue to mitigate all forms of modern slavery.

## Operational risks

Acknowledging that modern slavery comes in many different forms, our responsibility as an employer is to identify and mitigate any potential modern slavery risks within our own industry and business operations first, regardless of the level of severity.

Modern slavery practices that have been highlighted as having 'high risk' potential within the construction industry include:

- Forced or unpaid work
- Unsafe working conditions
- Bonded or child labour
- Inadequate accommodation
- Passport confiscation
- Human trafficking

Workers employed on temporary visas in Australia, including foreign workers, international students, and working holiday visitors, are particularly vulnerable to modern slavery practices. These individuals are integrated into our projects, both directly employed by Gamuda and indirectly through our supply chain.

Temporary visa holders are safeguarded by the interplay between workplace laws and immigration laws, which serves to ensure fair treatment and compliance, while fostering a fair and just work environment. Gamuda is mandated to adhere to these laws, or it risks losing its accredited sponsorship status.

Despite their dependence on employers for legal status, temporary visa holders are guaranteed the same legal protections as any other employee. This ensures they receive fair pay and working conditions, safeguarding their rights and well-being.

## Potential risks in our supply chain

Gamuda is committed to working with our suppliers to encourage an open dialogue and partnership that leads to the identification and resolution of potential risks of modern slavery within our supply chain. Two risk areas have been identified and explored within our supply chain:

- the sectors in which products/services are procured; and
- the geographical location of the suppliers.

During FY23, we assessed some key risks associated within the different sectors and geographic locations in which we procure goods and services, whilst also assessing some sectors and geographic locations in which we will procure goods and services in the future.

## Sector risk

We continue to assess our current supply chain, as well as sectors in which we will engage with in the future. We conduct these assessments through our pre-qualification process, via our procurement software system ARIBA.

It is widely acknowledged that the procurement of raw materials from overseas poses an elevated risk of modern slavery practices, with around 22% of forced labour victims found in the manufacturing of raw materials ([Source: KPMG report](#)).

Procuring materials and imported goods from overseas often involves complex supply chains and multiple layers across contractors and sub-contractors, which can result in poor visibility for construction companies over modern slavery risks.



Sector	Example Service or Product	Potential Risks Identified
Bulk Materials	Quarrying, Concrete, Steel etc.	<ul style="list-style-type: none"> <li>Forced labour</li> <li>Human trafficking</li> <li>Child labour</li> </ul>
Service Provider	Labour hire, landscaping, cleaning etc	<ul style="list-style-type: none"> <li>Wages, penalties and working hours</li> <li>Forced/Compulsory labour</li> <li>Child labour</li> </ul>
Transportation	Transportation of plant/heavy machinery	<ul style="list-style-type: none"> <li>Human trafficking</li> <li>Forced/Compulsory labour</li> <li>Child labour</li> </ul>
Plant, Equipment and Machinery	Raw materials and manufacturing	<ul style="list-style-type: none"> <li>Forced/Compulsory labour</li> <li>Human trafficking</li> <li>Child labour</li> <li>Wages and working hours</li> </ul>
Technology	Electronic devices, laptops etc.	<ul style="list-style-type: none"> <li>Forced/Compulsory labour</li> <li>Child labour</li> <li>Wages and working hours</li> </ul>

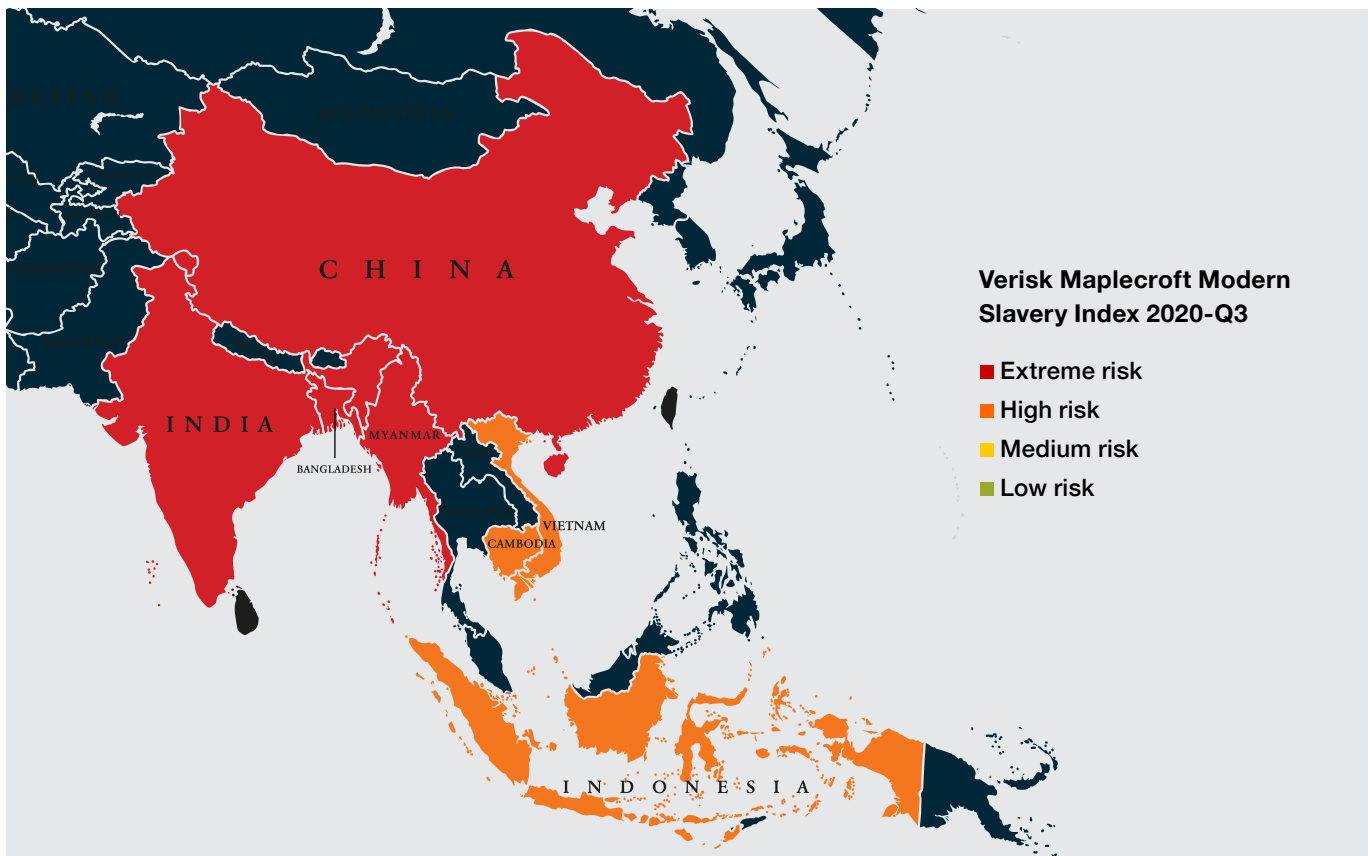
### Geographical risk

Gamuda's direct supply chain was located across numerous countries during FY23, and we recognise that our suppliers have their own complex supply chains which may span over multiple countries.

Overall, the assessed level of risk of modern slavery within our direct supply chain was medium to high during FY23, due to the types of goods and services that were procured, combined with the geography of where they were procured from.



View the list of developing countries as declared by the Ministry of Foreign Affairs



Map of risk areas

# ADDRESSING THE RISK OF MODERN SLAVERY PRACTICES: POLICY, GOVERNANCE AND COLLABORATION

As Gamuda continues to establish itself in Australia and grow during FY24, the opportunity for potential risks of modern slavery to appear within our operations and supply chains will increase. As such, it is extremely important that we continue to establish and improve our processes continuously.

Our company values, as mentioned earlier in this Statement, provide a cultural framework to inform the behaviour of our people.

At Gamuda, the risk for modern slavery is owned by the procurement team, however everyone at Gamuda has a responsibility to ensure that any business or person we conduct business with abides by our company code of conduct and relevant policies as outlined in the following sections.

## Policy and Governance

Gamuda is committed to an approach of active engagement and risk mitigation concerning any form of modern slavery. Our aim is to create a collaborative space where supply chain partners feel supported to discuss and address potential vulnerabilities within the supply chain. To assist in this we are committed to:

- Creating a safe working environment for all employees and contractors
- Adhering to all employment legislation, agreements, awards, codes, and regulations that protect the working rights for all employees and workers
- Providing training for our employees and workers on recognising modern slavery and human trafficking practices and explaining the steps they should take if they have a legitimate concern

To ensure we have the right frameworks in place to combat modern slavery, we developed and implemented formal policies and procedures to promote legal and ethically compliant business conduct and prevent violations of human rights.

This is demonstrated within our Company Code of Conduct, which is issued to, and acknowledged by all staff members. The document clearly outlines what we expect from our employees in order to conduct business in a way that promotes and protects the human rights of our people.

Additional key supporting policies that build on our Company Code of Conduct include the Social Procurement, Modern Slavery, Human Rights, Anti-Bribery and Corruption, Conflict of Interest, Code of Business Conduct and Whistleblower policies.

As part of our recruitment process, employment checks are conducted to ensure that staff members have a valid residency status. An example of how we do this is to check all temporary worker's visa conditions through the Visa Entitlement Verification Online system (VEVO).

Our onboarding process ensures that all new starters read, understand, and acknowledge all company policies and complete all necessary inductions, including Workplace Health and Safety, which outline the minimum expectations of how they are to operate within the workplace.

## Procurement Process

We have a 100% digital procurement process where all subcontractors and major suppliers undergo a pre-qualification process prior to award of any works. As part of this process, we undertake an assessment of what they have in place to manage modern slavery risks in their own supply chains. Where we identify a risk, we undertake an advanced assessment.

In the advanced assessment we aim to get clarity on how the supplier manages and monitors their policies and procedures in their operations and supply chains, including assessments, audits, contractual requirements, training, guidance, etc. Each supplier is expected to clearly outline whether they are a reporting entity under the Commonwealth Modern Slavery Act 2018. They are to disclose any convictions, where materials are sourced from internationally, clearly explain what the human rights and modern slavery risks are within their own supply chains, and what policies and procedures are in place to eliminate these risks. Inspections are also undertaken by Gamuda where required.

## Modern Slavery Policy

To raise awareness of modern slavery and its potential risk within our workplace, Gamuda implemented a Modern Slavery Policy into our suite of key company policies. This policy provides guidance on the different ways in which modern slavery can be present within an organisation. It also provides guidance on what to do if an employee or contractor discovers a potential case of modern slavery and outlines what Gamuda is doing to combat modern slavery in the workplace and throughout our business operations.

## Remediation

We encourage the reporting of all genuine concerns of malpractice or misconduct in the workplace. We do this by providing an accessible and safe reporting mechanism, and protecting people who make disclosures of serious wrongdoing, including unlawful, unethical, fraudulent, or undesirable conduct related to Gamuda.

As such, a comprehensive Whistleblower Policy is in place to ensure that there is a clear process for reporting malpractice or misconduct within the workplace.

This policy and procedure gives our employees and contractors guidance on how and where to report concerns. Once a concern is reported through the appropriate channel, we acknowledge and investigate the concern appropriately. Should the investigation sustain the concern raised, remedial action will be taken, the reporter will be advised, and all relevant information and outcomes will be documented.

To protect all whistleblowers, our policy prohibits any form of retaliation or negative impact towards anyone who reports a concern or participates in an investigation.

During FY23, there were no reports or concerns raised relating to modern slavery or human trafficking.

## Partnerships

Since 2021 Gamuda has been an active members of the Infrastructure Sustainability Council (ISC), which aims to ensure all infrastructure activities deliver cultural, social, environmental, and economic benefits. By contributing to, and supporting ISC's vision, we aim to minimise the risks and impacts of modern slavery in all forms.

During the FY23 reporting period, Gamuda also became a member of Social Traders, an organisation which advocates for social enterprises by providing Australia's only social enterprise certification. Through driving the social impact agenda, Social Traders empowers people from refugee and asylum-seeking backgrounds to participate in employment opportunities and raises awareness of the barriers to employment for migrant workers in Australia and the associated modern slavery risks.

In FY24 and beyond, we will continue to expand our network and collaborate with other agencies like the Green Building Council of Australia and the Supply Chain Sustainability School to continue to work toward eradicating modern slavery.

# ASSESSMENT AND COMMITMENT

## Assessing effectiveness

Gamuda continuously assesses and looks to improve its operations and supply chains to remove risks of all forms of modern slavery in the workplace.

Key ways in which we assess the effectiveness of our modern slavery measures include:

- Regularly reviewing and assessing business processes against the governance frameworks that have been implemented to combat modern slavery in the workplace
- Identifying and collaborating with industry experts to assess and share knowledge of the key issues, trends and causes of modern slavery
- Monitoring the channels in which malpractice can be reported to spot any trends that could relate to modern slavery

## Future commitments

Our commitment to abolishing modern slavery is ever present and as such, we must take a continuous improvement approach to tackling it. Therefore, key actions have been identified and will be initiated during FY24, which include:

- Continuous review and update of our suite of risk-related policies and governance control measures.
- Delivery of appropriate awareness training on modern slavery principles to Gamuda employees and external contractors and suppliers.
- Increasing and adopting due diligence activities across our operations and supply chain to ensure that we are minimising all potential modern slavery risk.
- Mature our understanding of modern slavery risks within our business beyond our tier one suppliers and explore opportunities to learn from industry and contribute to industry initiatives through various partnerships.
- Engage a Global Migration Advisor to provide comprehensive advice on recruitment, retention, and support of migrant employees, ensuring compliance with complex immigration regulations.

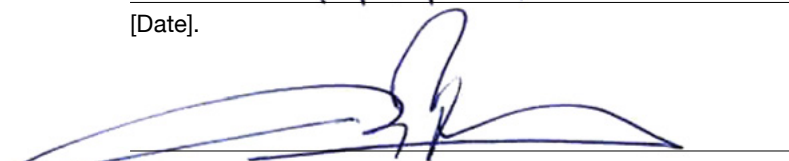
## Sign off

This Statement is made pursuant to section 13(1) of the Modern Slavery Act (Commonwealth) 2018. It constitutes the joint statement of Gamuda and covers the reporting period 1 July 2022 to 30 June 2023.

The Statement was prepared in consultation with our controlled entities (including the reporting entities). This statement was approved by the board of Gamuda (Australia) Branch ABN 27 632 738 768 and Gamuda Engineering Australia ABN 36 636 433 522) on

24/6/24.

[Date].



Signed (the Chair of the Board of Directors)