

ILF CONSULTING ENGINEERS AUSTRALIA  
**ADDRESSING MODERN  
SLAVERY PROCEDURE**

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# REVISIONS

0	15.01.2024	First issue	M. Gillmer	Hall & Wilcox	H. Fassel
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## PURPOSE

ILF Consulting Engineers Australia Pty Ltd (**ILF**) does not tolerate, support or engage in modern slavery and human trafficking.

This procedure illustrates ILF's commitment to improving our practices to combat slavery and human trafficking and outlines some of the steps that ILF is taking to address the risks associated with modern slavery.

We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners, and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

## DEFINITIONS

**Modern slavery** for the purposes of this procedure is defined as including eight types of serious exploitation as outlined in the Modern Slavery Policy.

**Risks of modern slavery practices** means the potential for ILF to cause, contribute to, or be directly linked to modern slavery through its supply chains and operations.

**Suppliers** is defined as any organisation or person who provides us with goods or services, including their subcontractors, agents, related entities and consultants.

**Supply chains** is defined as the products and services (including labour) that contribute to ILF's own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.

## WHAT IS ILF'S BUSINESS AND ORGANISATION STRUCTURE?

The ILF Group consists of internationally active, independent and multi-disciplinary engineering, project management and consulting firms that have the joint mission to be a leader in improving quality of life around the globe, by helping its clients to successfully execute technically demanding industrial and infrastructure projects.

ILF's operations are located in New South Wales.

## OUR SUPPLY CHAINS

The primary suppliers in our supply chain are third party companies that supply ILF with hardware, software, office facilities and office infrastructure.

ILF considers there is a relatively low risk of it causing, or contributing to, modern slavery in its operations and supply chains.

As an Australian provider of engineering and project management consultancy services, ILF considers its operations and supply chain to be relatively simple in comparison to many other industries. ILF employs most of its staff directly on permanent contracts.

ILF works with a range of suppliers who provide goods and services across several different categories. ILF recognises there is risk of being indirectly linked to modern slavery, as our suppliers may source products or raw materials from overseas companies connected with modern slavery.

Our supply chain includes third-party services provided to ILF directly by supply of goods, facilities services, and professional services. We engage various Australian-based providers to provide cleaning, waste management and maintenance services to our Australian offices. While the labour provided by our suppliers is sourced in Australia, we recognise that cleaning, waste management and maintenance services are high risk sectors. By engaging these services through a third party we may be indirectly contributing to modern slavery practices.

In addition, products used by our suppliers may be sourced both in Australia and overseas. It is possible that some of our supplier's products, or their components, may be sourced from countries and industries where there is some risk of being linked with modern slavery.

## **ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS**

### **Our Policies on Slavery and Human Trafficking**

The management of all ILF Group companies are aware of their great responsibility in respect of their employees, clients and society as a whole and therefore always act in accordance with the applicable laws and standards. The management of all ILF Group companies are also committed to achieving the highest standards of ethics and compliance.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking is not taking place anywhere in our supply chains.

### **Due Diligence Processes for Slavery and Human Trafficking**

As part of our initiative to identify and mitigate risk, the ILF Group has developed an Integrated Management System (IMS).

The IMS system contains all of the work processes that all ILF employees across the group are expected to comply with and combines quality management, safety, security, health protection, environmental management, compliance, knowledge management and project management.

As a result of our commitment to quality and our consistent improvements in this area, all Companies of the ILF Group are certified in accordance with ISO 9001 2005 and several are also ISO 45001:2019 SCC and ISO 14001:2015 certified.

The ILF Group has a Code of Conduct, which applies to all business activities of the ILF Group and to all employees. All employees are given the Code of Conduct at the outset of their employment and any breaches are regarded with the utmost seriousness.

ILF has policies in place which allow all companies within the ILF Group to:

- identify and assess potential risk areas in our supply chains;
- mitigate the risk of slavery and human trafficking occurring in our supply chains;
- monitor potential risk areas in our supply chains; and
- protect whistle-blowers.

ILF Group is absolutely committed to fostering an environment where whistle-blowers can feel confident enough to report any experienced irregularities and identified misconduct. In fact our Compliance Management System, which is publicly available at <https://www.ilf.com/whistleblowing-contact/>, includes a structured whistleblowing system to facilitate this.

### Supplier Adherence to our Values

We have zero tolerance to slavery and human trafficking.

Our remit is to ensure that all of our employees and business partners comply with the high standards which we set for ourselves, and ensure that their own organisations and supply teams are free from modern slavery and human trafficking.

The ILF Group takes a top down approach to this issue and, as such, our Compliance Management System, which applies across all companies of the ILF Group, allocates specific ultimate responsibility for these areas to employees at the highest levels within the Group and individual companies within the Group.

The responsible individuals will seek to monitor any risk areas and encourage anyone to report any concerns regarding supplier activities.

### Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide our Principals, employees and workers with a copy of the modern slavery policy and encourage them to report any concerns to their manager.

We have referred our people to the website <https://antislavery.org.au/modern-slavery/> to provide them with useful information on modern slavery and human trafficking, how to recognise the various different types and how to report it along with details of a helpline.

### EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Information provided from any preferred suppliers.
- Any concerns raised by our Principals, employees or workers.

## **FURTHER INFORMATION**

For more information please speak to your manager or refer to the Modern Slavery Policy.

## **VARIATION**

ILF may vary, replace or revoke this procedure. This policy is not intended to impose legally binding obligations on ILF, and is not incorporated into employee's terms and conditions of employment or engagement. Employees will be informed of revisions to this procedure as they arise and the date from which these changes will take effect. In the event of any dispute under this procedure, the decision of ILF will be final and binding.