

ILF CONSULTING ENGINEERS AUSTRALIA MODERN SLAVERY POLICY

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REVISIONS

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Introduction

ILF Consulting Engineers Australia Pty Ltd (**ILF**) does not tolerate, use or condone child or forced labour in any of its operations or premises. ILF works to ensure these practices are not present in its workforce or supply chain.

Scope

This policy applies to all employees, volunteers, trainees and contractors of ILF and any contractors or others who are informed by ILF that this policy applies to them (collectively, **Workers**).

What is modern slavery?

Modern slavery is a crime and a gross violation of fundamental human rights. It is defined under the *Modern Slavery Act 2018* (Cth) (the Act) as including eight types of exploitation:

- **trafficking in persons** which is the recruitment, harbouring and movement of a person for the purposes of exploitation through modern slavery. This can include forced labour;
- **slavery** which is where the offender exercises powers of ownership over the victim;
- **servitude** which is where the victim's personal freedom is significantly restricted, and they are not free to stop working or leave their place of work;
- **forced and compulsory labour** which is where the victim is either not free to stop working or not free to leave their place of work;
- **forced marriage**;
- **debt bondage** which is where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined;
- **the worst forms of child labour** which involves situations where children are exploited through slavery or similar practices, including hazardous work which may harm their health; and
- **deceptive recruiting for labour or services** which is where the victim is deceived about whether they will be exploited through a type of modern slavery.

ILF's response to modern slavery

We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships. We are committed to implementing 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.

When we are made aware of modern slavery practices in our own business or within our supply chain, we will investigate all claims and if valid resolve the issue in line with the values expressed in this policy.

ILF’s supply chain

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.

Suppliers must use best endeavours to ensure that there is no modern slavery in their supply chains and operations. In the event suppliers identify any occurrence of, or material risk of, modern slavery in their supply chains or operations they are to take practical and effective steps to address that occurrence or risk.

Suppliers must notify ILF as soon as practicable of any occurrence of, or material risk of, modern slavery they have identified and notify relevant authorities where appropriate.

Roles and responsibilities

The Chief Risk Officer of ILF Group Holding has overall responsibility for ensuring that all ILF Group companies are compliant with their legal and ethical obligations at Group level.

The Corporate Management of ILF is responsible for ensuring ILF and its employees and suppliers comply with their obligations under this policy at Australian level.

Corporate Management has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure that they are effective in countering modern slavery, with oversight from the Chief Risk Officer.

Management at all levels are responsible for ensuring that those reporting to them understand and comply with this policy, and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Compliance with the policy

Workers must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business, or supply chains of any supplier tier, at the earliest possible stage. If you believe or suspect a breach of this policy has occurred, or that it may occur, you must notify your manager.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.

ILF aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting, in good faith, their suspicion that modern slavery of whatever form is, or may be, taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately.

Communication & Awareness of this Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided, as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them, and reinforced as appropriate thereafter.

Workers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the compliance manager.

Breaches of this Policy

A Breach of this policy may lead to disciplinary action. Serious breaches may be regarded as gross misconduct and may lead to disciplinary action up to and including summary dismissal.

We may terminate our relationship with suppliers, other individuals and organisations working on our behalf if they breach this policy.

Variation

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