



Modern Slavery Statement 2026



1. Background

The *Modern Slavery Act 2018* (Cth) (the **Act**) imposes mandatory reporting obligations on certain Australian entities to identify, assess, and address modern slavery risks within their operations and supply chains. It establishes a national transparency framework designed to improve corporate accountability and support ethical business practices. By requiring annual Modern Slavery Statements and promoting continuous risk-management, the Act also contributes to broader international efforts to prevent and eradicate modern slavery.

According to the Walk Free Foundation, Australia ranks among the leading countries globally, alongside the United Kingdom and the Netherlands, for its governmental response to modern slavery, achieving a response score of 67/100. Despite this comparatively strong performance, modern slavery remains a significant global and domestic concern. In 2021, an estimated 50 million people worldwide were living in conditions of modern slavery, comprising approximately 28 million in forced labour and 22 million in forced marriage, representing an increase of 10 million people since 2018.

The 2023 Global Slavery Index estimated that 41,000 people were living in modern slavery in Australia, representing a prevalence of 1.6 per 1,000 people. Nearly two-thirds of all forced labour cases globally are linked to international supply chains, with exploitation occurring across diverse sectors and at every stage of production, from raw materials to finished goods. Each year, Australia imports an estimated USD 17.4 billion worth of goods identified as being at high risk of modern slavery, namely forced labour. High-risk product categories include electronics, textiles, seafood, garments, and solar panels, underscoring the systemic vulnerabilities embedded within globalised supply networks and the importance of robust corporate due diligence.

Under the Act, modern slavery encompasses eight severe forms of exploitation, including:

- Trafficking in persons
- Slavery
- Servitude
- Forced marriage
- Forced labour
- Debt Bondage
- The worst forms of child labour
- Deceptive recruiting for labour or services.

These practices constitute serious human rights violations. The Act requires reporting entities to identify, assess, and address the risks of these forms of exploitation within their operations and supply chains.

At Ausenco, we are committed to meeting our responsibilities under the Act and supporting the protection of human rights. We strive to operate ethically and with integrity, and we take steps to identify, assess, and manage modern slavery risks across our operations and supply chains. Our aim is to maintain a safe, respectful, and

transparent environment for everyone we work with, and to contribute to broader efforts to prevent modern slavery in all its forms.

Reporting Entity

This is Ausenco’s seventh year of reporting under the Act. This joint statement is made in respect of Ausenco Pty Ltd (ACN 114 541 114), and its related bodies corporate set out in Appendix 1, for the period 30 June 2025 to 30 June 2026. This statement was approved by the Board of Directors and the Ausenco Audit and Risk Management Committee (ARMC) in their capacity as the principal governing body of Ausenco Pty Ltd on 29 June 2026. As of 2024, Ausenco’s Canadian entities are also required to report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C. 2023* (Canadian Supply Chains Act).

1.1 Stakeholder Consultation

During the reporting period covered by this Statement, Ausenco engaged and consulted with its related bodies corporate outlined in Appendix 1 and internal stakeholders. The actions outlined in this Statement were implemented in consultation with Ausenco’s Legal Team, People and Performance Team, Procurement, and Vendor Team.

Ausenco provides annual training through a global Business Ethics program delivered across all regions. This mandatory training is required for all personnel and offers an overview of Ausenco’s Business Ethics framework, including our expectations for ethical conduct and responsible decision-making. The program also covers relevant legislative requirements, including modern slavery laws in both Canada and Australia, to ensure our people understand their obligations and the role they play in identifying and managing modern slavery risks.

2. Our business structure and operations

Ausenco is a global engineering consulting company, with its headquarters located in in Brisbane, Australia.

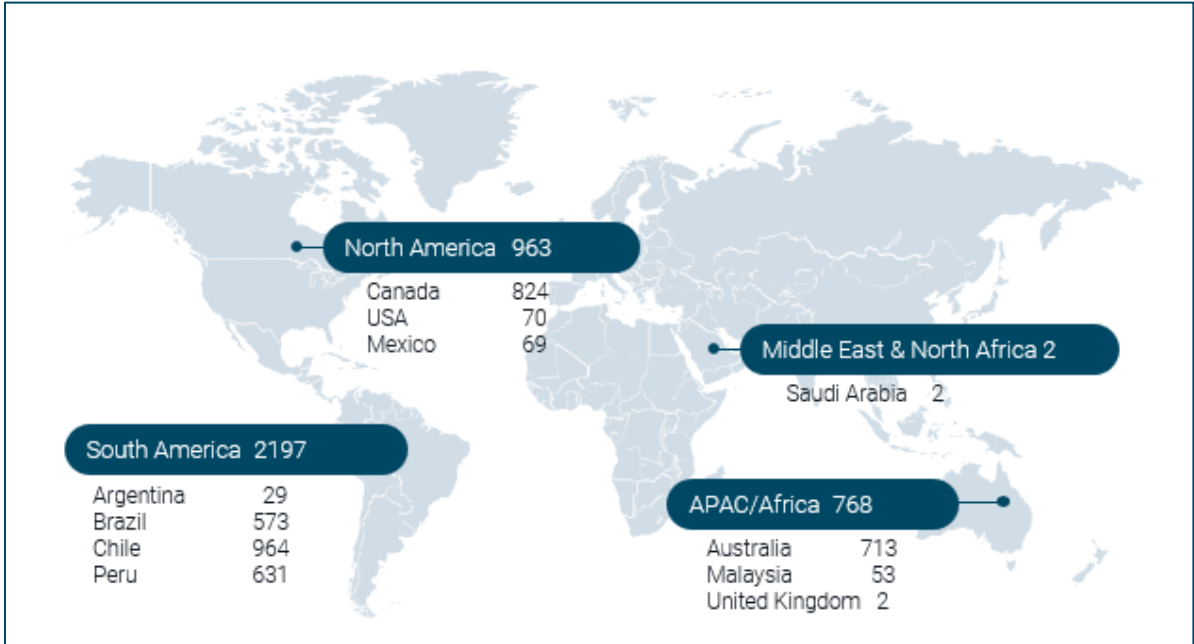


Figure 1.1 Highlights of People in various Ausenco offices around the world

We are a global engineering, consulting and project delivery firm built for the mining industry. The team is based out of 21 offices working across five continents to deliver services worldwide. Combining deep technical expertise with a 30-year track record, we deliver innovative, value-add consulting, studies, project delivery, asset operations and maintenance solutions to the minerals and metals and industrial sectors. We find a better way.

Throughout our growth, our commitment to innovation never wavered. We are still dedicated to finding ingenious solutions that create value for our clients - on every project. We are always looking to deliver practical solutions to complex problems – and sometimes that means pushing the boundaries of what has been done before.

We are also committed to having a positive impact on the world around us. Wherever we work, we strive to collaborate with clients and communities to achieve truly sustainable outcomes in health, safety, the environment and community.

2.1 Our Values

Our core values are the cornerstone of everything we do. They enable us to discover through ingenuity and lead by example.

Safety in all we do

Regardless of where our people work across the globe, they deserve to be safe and feel safe. We let nothing compromise our safety performance and have safety initiatives in place to achieve our target of Zero Harm.

The client is our focus

We develop trusting and open relationships with our business partners and clients, ensuring we meet their needs and exceed their expectations. By delivering extraordinary results, we build their business and our own.

Our people are our strength

We value our people's ability, diversity, and creativity, and do all in our power to nurture their existing talents and develop new ones. The way we care for, grow and encourage our people is a key part of our culture, and is governed by our People Practices.

Respect the community and environment

Wherever we operate, we respect the diverse communities and environments and strive to achieve sustainable outcomes for all. Our footprint must engender a positive outlook for future generations, both abroad and at home.

We seek ingenious solutions

We encourage our people to continually expand their knowledge and experience to become life-long learners. By constantly striving to find the best solution, we foster innovation.

We are open, honest and collaborative

We respect the diversity and differences of our people, clients and the communities in which we live and work. We are straightforward and collaborative in all our communication.



3. Our Approach

3.1 Supply Chain Risks and Due Diligence

As part of Ausenco's vendor onboarding process, we continue to issue the Modern Slavery Questionnaire to vendors. This tool remains a key mechanism for evaluating supply chain practices and identifying potential modern slavery risks.

We work closely with our Vendor Team to capture and review vendor responses, and by integrating the Questionnaire into our Vendor Request Workflow, we have strengthened our ability to support both the Vendor Team and the wider business. This integration helps ensure vendors complete the Questionnaire and reinforces its importance across the organisation. Its role in identifying and managing modern slavery risks is also highlighted in our annual global Business Ethics Training program.

In May 2024, we expanded the use of the Questionnaire to include both new and existing vendors within our Canadian operations, and we continue to collect and assess responses from these vendors. This Statement incorporates key insights from the responses received across our Canadian and Australian operations.

The following are the key findings revealed by their responses:

- **Geographical Distribution:**

Among the vendors who completed the Questionnaire for our Australian operations, 68% were located in Australia and 14% in Canada, both jurisdictions generally considered lower-risk due to strong regulatory frameworks and established enforcement mechanisms. The remaining 18% of vendors were distributed across a diverse range of countries, including the United States (6%), Philippines (4%), Africa—including South Africa, Tanzania, Côte d'Ivoire, and Namibia (4%), the United Kingdom (4%), and other regions such as France and Europe (each 1%). Some of these jurisdictions, particularly those with less stringent labour protections or higher levels of informal labour markets, may present elevated modern slavery risks.

For our Canadian operations, vendors across ten Canadian provinces and territories represented approximately 71% of responses. A further 13% of responses were from vendors in the United States, 2% from Australian vendors, and the remaining 14% from other jurisdictions, including Brazil, Chile, France, Italy, Spain, Sweden, and the United Kingdom. This geographical spread highlights the importance of conducting targeted due diligence and ongoing monitoring, particularly for vendors operating in jurisdictions with known vulnerabilities to forced labour, human trafficking, or exploitative working conditions.

- **Service Composition**

Analysis of the Questionnaire responses in the Australian operations indicate that the majority of participating vendors operate within professional services sectors. This includes engineering consulting (36%), general consulting (7%), human resources services (10%), IT services (10%), and smaller proportions providing environmental consulting (4%), financial services (3%), events and marketing (2%), surveying (1%), advertising (1%), and health and wellbeing services (1%). These sectors typically present a lower inherent risk of modern slavery, given their reliance on skilled labour, regulated professional standards, and formal employment structures.

A smaller subset of vendors operates in sectors with elevated exposure to modern slavery risks, including food and beverage services (1%), hotel accommodation (2%), transportation (3%), and cleaning services

(1%). These industries are commonly associated with low-wage, low-skill labour, subcontracting arrangements, and informal employment practices, all of which can heighten vulnerability to exploitation.

In contrast, analysis of the Questionnaire responses from the Canadian operations shows that 49% of respondents operate within the professional, scientific and technical services sector. This is followed by 11% in accommodation and food services, 8% in information and cultural industries, 6% in administrative and support, waste management and remediation services, 6% in construction, 6% in educational services, 5–6% in manufacturing, 3% in retail trade, and 3% in transportation and warehousing.

This distribution indicates a strong concentration of vendors in skilled, regulated professional sectors, with smaller but notable representation in industries that may present heightened modern slavery risks, particularly accommodation and food services, manufacturing, and transportation. These insights support a targeted approach to due diligence, focusing enhanced controls on vendors operating within higher-risk categories while maintaining proportionate oversight across the broader supplier base.

- **Modern Slavery Policies and Procedures**

Across the Australian operations, 45% of vendors reported having policies and processes in place to identify, investigate and remedy instances of modern slavery, forced labour and child labour, and 52% confirmed the existence of a formal policy prohibiting such practices.

For the Canadian operations, 43% of organisations reported having a policy or process prohibiting modern slavery, including all forms of forced labour, child labour, bonded labour and human trafficking within their operations and supply chains. This result is consistent with the prior year's findings.

- **Employee Awareness**

Currently, 35% of vendors provide training on modern slavery risks, compared with 77% in the previous year. This reduction may reflect the profile of this year's respondents, which includes a higher proportion of small businesses. Several vendors also indicated that they intend to implement training programs in the near future.

Encouragingly, 72% of vendors reported having mechanisms that allow workers to anonymously raise concerns relating to labour conditions or workplace grievances, indicating continued maturation in ethical labour governance practices. Within the Canadian operations, some organisations provide training on modern slavery, forced labour and child labour risks, although implementation is not yet universal. This highlights an opportunity to strengthen supplier capability and awareness across the region.

- **Supply Chain Due Diligence**

Supply chain due diligence practices remain relatively strong, with 41% of vendors conducting assessments for modern slavery risks within their supply chains, and 31% requiring their own suppliers to undertake similar assessments. In addition, 76% of vendors comply with key International Labour Organisation (ILO) conventions, and 55% actively check for child labour within their operations and supply chains. Collectively, these figures indicate a growing awareness of ethical sourcing obligations, although further progress is needed to strengthen policy implementation and employee engagement across the vendor base.

Within the Canadian operations, 82% of respondents confirmed compliance with the United Nations ILO Conventions relating to the worst forms of child labour, hazardous child labour and minimum age for work. Furthermore, 45% of respondents reported conducting due diligence on their suppliers to assess modern slavery, forced labour and child labour risks, demonstrating a consistent commitment to responsible sourcing practices across the region.

Across Australian operations, most vendors operate in lower-risk professional services sectors such as engineering (36%), HR (10%) and IT (10%). Only a small proportion fall within higher-risk industries like food and beverage, accommodation, transportation and cleaning.

Canadian operations show a similar profile, with 49% of vendors in professional, scientific and technical services, followed by smaller proportions in accommodation and food services (11%), information and cultural industries (8%), and other sectors where targeted due diligence may be required.

In Australia, 45% of vendors have modern slavery policies and processes, 52% have a formal prohibition, and 72% provide anonymous reporting mechanisms. In Canada, 43% have a modern slavery policy, 82% comply with key ILO Conventions, and 45% conduct supplier due diligence.

Supply chain due diligence remains solid, with 41% of Australian vendors assessing modern slavery risks, 31% requiring suppliers to do the same, 76% complying with ILO conventions, and 55% checking for child labour. Canadian vendors show similar strength, with 82% meeting ILO standards and 45% conducting supplier due diligence.

Overall, both regions demonstrate growing awareness and commitment to ethical sourcing, with opportunities to strengthen training and risk-based controls. No instances of modern slavery were identified in Ausenco's operations or supply chains during the reporting period.

Ausenco continues to grow globally, with an expanding workforce and the recent establishment of a new office in Saudi Arabia. While this office is not yet fully operational, its presence in a higher-risk jurisdiction underscores the importance of proactively establishing appropriate due diligence processes. As operations in the region develop, we will prioritise the implementation of robust controls, including modern slavery risk assessments, supplier screening, and compliance frameworks tailored to the local risk environment, to ensure our standards are upheld across all new markets.

3.2 Remediation

Workplace Relations

As a global company, Ausenco values the diversity of its workforce and recognises it as a source of strength and innovation. We are committed to fostering a workplace that is free from discrimination, where all individuals regardless of background can work together in a respectful and professional environment.

Maintaining a discrimination-free workplace is a shared responsibility across all levels of the organisation, including employees, contractors, and consultants. Discrimination in any form is taken seriously and will not be tolerated. To support our commitment to diversity and inclusion, we have several employee-led groups, including:

- **Pride@Ausenco** – Focused on empowering LGBTQ+ inclusion and celebrating diversity. The initiative promotes a culture where all employees feel respected, valued, and supported.
- **Women@Ausenco** – Provides networking and mentoring opportunities to support the professional growth of women and raise their visibility within the organisation.
- **D&I Committee** – Champions initiatives that promote equity, inclusion, and belonging across the business.

Our Diversity and Inclusion Policy outlines how we promote diversity in areas such as education, skills, religion, ethnicity, language, gender, sexual orientation, disability, and age. Complementing this, our Fair Treatment Policy ensures a workplace free from bullying, discrimination, and harassment.

We also have clear remediation processes in place to address concerns related to labour practices or workplace grievances. Personnel can raise issues with their line manager, the People & Performance team, management, or through our Anonymous Whistleblower Alertline.

All procedures are clearly documented, shared with new employees, and accessible through our internal systems. These processes help ensure that concerns are addressed promptly and fairly, supporting a respectful and inclusive work environment for all.

Dispute Resolution

Ausenco's standard contracts include dispute resolution provisions that allow suppliers to raise concerns and escalate issues to our personnel and management. These contracts also require suppliers to comply with our Modern Slavery Policy and all relevant laws. Failure to comply may result in termination of the agreement.

In 2024, we introduced further amendments to our standard contracts in our Canadian operations to align with the Canadian Supply Chains Act. These updates apply to both new and existing subconsultants and independent contractors, who typically provide project-specific or ongoing services. Ausenco's standard subconsultant and independent contractor agreements include clauses to ensure:

- Supplier personnel must not engage in any form of modern slavery;
- Suppliers must comply with all applicable laws, including modern slavery legislation (Canadian Supply Chains Act and the Australian *Modern Slavery Act 2018* (Cth) and Ausenco's Modern Slavery Policy;
- Where applicable, suppliers must implement relevant policies, procedures, and training;
- Suppliers must ensure similar protections are in place within their own supply chains;
- Suppliers must cooperate with Ausenco in investigating any suspected breaches of the relevant modern slavery legislation;
- Ausenco reserves the right to terminate agreements if a supplier fails to comply with the Policy or is found in violation of the relevant modern slavery legislation.

These measures strengthen our ability to manage modern slavery risks and reinforce our commitment to ethical and responsible sourcing.

Ausenco's Whistleblower Protection Policy and Alertline

Ausenco's Whistleblower Protection Policy and Whistleblower Alertline is easily accessible to all personnel, subcontractors, and consultants via our website and internal document management system. As part of our ongoing commitment to ethical conduct, this policy is also a key component of our annual global Business Ethics training, which is currently being delivered across the organisation.

Our annual Business Ethics training includes comprehensive guidance on Ausenco's Whistleblower Protection Policy and clear instructions on how to use the "Alertline", our confidential reporting channel. This ensures that all personnel are informed of their rights and understand how to raise concerns appropriately.

To support anonymous reporting, the Alertline is accessible globally to all personnel. It provides a secure and confidential way to report (online or over the phone) any breaches of company policies, including potential modern slavery risks within our operations or supply chains.

The key objectives of Ausenco's Whistleblower Protection Policy are to:

- Promote ethical conduct and help prevent wrongdoing across the organisation;

- Outline the legal protections available under Australia's statutory whistleblower regime for individuals reporting actual or suspected misconduct;
- Provide clear procedures for handling and investigating disclosures made by whistleblowers.

We strongly encourage individuals to report any concerns. To date, no instances of modern slavery have been reported through the Alertline or to management. We remain committed to fostering a transparent, accountable, and safe environment where everyone feels empowered to speak up without fear of retaliation.

3.2.1 Employee Awareness

At Ausenco, we prioritise educating our employees about modern slavery and its potential presence within our supply chains. Our global annual Business Ethics training, delivered both in person and virtually, ensures broad participation across the organisation.

This mandatory training provides all personnel with an overview of our legislative obligations under modern slavery laws in Canada and Australia. It also builds awareness of the nature of modern slavery, how to identify potential risks within supply chains, and the appropriate procedures for escalating and reporting concerns — including through our Anonymous Whistleblower Alertline.

During this reporting period:

- In the APAC Africa region, 390 personnel participated in training sessions.
- In South America, 855 personnel participated in training sessions.
- In North America (and Mexico), 803 personnel participated in training sessions, with sessions concluding in December 2025.

Training will continue to be delivered globally throughout the year, with recorded sessions made available for personnel unable to attend live sessions. By providing these initiatives and ensuring access to essential resources, we aim to equip our people with the knowledge and tools required to identify, manage and respond to modern slavery risks across our operations and supply chains.

4. Looking ahead

To strengthen our response, we will be implementing the following initiatives:

- Aligning procurement and vendor registration processes across regions and business lines to ensure consistency, transparency, and improved oversight.
- reviewing and refining our Vendor Onboarding processes, policies, and project documentation to better integrate modern slavery risk considerations
- inducting supply chain risk assessments using Modern Slavery Questionnaires across multiple jurisdictions and expanding into new regions.
- Continuing supplier risk assessments and due diligence to deepen our understanding of modern slavery risks and enhance mitigation strategies.
- Continuing employee awareness initiatives, including our annual global Business Ethics training program.

These actions reflect our ongoing efforts to strengthen how we identify, assess, and manage modern slavery risks, and to support ethical and responsible practices across our operations and supply chains.

Appendix 1

Ausenco Entity	Location
Vector Argentina SA	Argentina
Ausenco Operations Pty Ltd	Australia
Ausenco Services Pty Ltd	Australia
Ausenco Projects Australia Pty Ltd	Australia
Ausenco Rylson Asset Optimisation Pty Ltd	Australia
Ausenco International Pty Ltd	Australia
Ausenco do Brasil Engenharia Ltda.	Brazil
Ausenco Engineering Canada ULC	Canada
Ausenco Sustainability ULC	Canada
Ausenco Chile Limitada	Chile
Ausenco Peru S.R.L	Peru
Ausenco Engineering USA South Inc	USA
Ausenco PSI LLC	USA
Ausenco USA Inc	USA
Ausenco Mexico S. De R.L. De C.V	Mexico

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of Ausenco Pty Ltd as defined by the *Modern Slavery Act 2018 (Cth)*¹ ("the Act") on 29 June 2026.

Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of Ausenco's Audit and Risk Committee as defined by the Act²:



Rod Baxter
Non-executive Director and Chair of the Ausenco Audit and Risk Committee

Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	2, 10
b) Describe the reporting entity's structure, operations and supply chains.	2,3,10
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	5,6,7
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	5,6,7
e) Describe how the reporting entity assesses the effectiveness of these actions.	5,6,7
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement). *	3, 10
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	

* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

** You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

- Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.
- Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001*—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.



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every day.

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