

Modern Slavery Policy

Our Purpose

Brunel maintains zero tolerance for modern slavery and any other form of human rights infringement including; forced labour, human trafficking, child labour, discrimination, suppression of freedom of association and collective bargaining in its own operations and throughout its value (supply) chain. Brunel expects all who have, or seek to have, a business relationship with the Company to familiarise themselves with this policy and to act in a way that is consistent with our corporate values of Entrepreneurship, Integrity, Results driven and Passion for People. We recognise the importance of standing by these values to safeguard our reputation and promote growth in an ethical and sustainable way.

This Policy explains how Brunel's Australian entities comply with the *Modern Slavery Act 2018 (Cth)* and give full local effect to the commitments set out in the *Brunel Global Human Rights Policy (2025)*.

Scope

This Policy applies to:

- All Brunel Australia employees, directors, contractors, consultants and agency workers;
- All business partners, suppliers and other parties within Brunel's Australian Value Chain/Supply Chain (see definitions).

Standards and Legislative Framework

Brunel Australia's approach is guided by the following hierarchy of instruments:

1. **Brunel Global Human Rights Policy (2025)** – which incorporates the UN Guiding Principles on Business and Human Rights and the ILO Fundamental Conventions.
2. **Modern Slavery Act 2018 (Cth)** and any successor legislation.
3. Any Commonwealth, State or Territory law that imposes higher standards in relation to modern-slavery risks.

Policy Statement and Commitments

Brunel Australia safeguards its commitments under this Policy by focusing on the following areas across our business:

1. **Risk assessment & mitigation** – Identify, assess and manage human-rights risks across our operations and value chain.
2. **Code of Conduct alignment** – Embed expectations for ethical behaviour and respect for human rights in our Codes of Conduct and contractual documents.
3. **Due diligence** – Conduct proportionate due-diligence on suppliers and other third parties, including corrective-action plans where risks are identified.
4. **Training & awareness** – Provide mandatory human-rights and modern-slavery training to relevant personnel and refresher training at least every year.
5. **Reporting** –
 - Publish an annual Modern Slavery Statement covering Australian operations, prepared in coordination with the Global People & Culture function and made available on Brunel's global website.
 - Contribute relevant data to Brunel's global human-rights disclosures
6. **Whistleblowing & grievance** – Maintain secure, confidential channels for raising concerns, consistent with Brunel's Global Whistle-blower Policy, and ensure concerns are investigated promptly and fairly.
7. **Continuous improvement** – Review and enhance processes through stakeholder engagement and collaboration.

Governance, Assurance & Responsibilities

The effectiveness and implementation of this Policy are monitored through Brunel Australia's Quality Audit Schedule. Findings are documented, corrective actions assigned, and outcomes reported based on the below escalations:

- **Primary escalation:** Managing Director – Operations
- **Secondary escalation:** Global Chief Executive Officer (via the Managing Director)

Role	Key responsibilities
Global Chief Executive Officer & Executive Board	Ultimate accountability for respecting and promoting human rights; review serious or systemic adverse audit findings and ensure adequate resourcing for corrective actions.
Global Head of People & Culture (Policy Owner)	Maintain and update global and regional policies with local teams; consolidate reporting; provide oversight of regional implementation.
Managing Director – Operations (Delegate)	Ensure local implementation; oversee Quality Audit Schedule; review audit outcomes; escalate adverse findings to the Global CEO; coordinate statutory and global reporting.
Managers & Supervisors	Integrate Policy requirements into business decisions, supplier engagement and workforce management; cooperate with audits and implement corrective actions.
Employees, Contractors & Suppliers	Comply with this Policy, participate in training and audits, and report any suspected breaches.

Definitions

Value Chain / Supply Chain means all upstream and downstream entities with which Brunel has a business relationship, including suppliers, subcontractors, consultants, clients and organisations benefiting from Brunel's services. These terms are used interchangeably in this Policy.

Review

This Policy will be reviewed regularly by the local Commercial Manager and the Global Head of People & Culture in consultation with the Managing Director of Australia, or sooner if required by changes in legislation or Brunel's operating environment.



Tania Sinibaldi
Managing Director - Operations
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