

Brunel

Modern Slavery Statement



Organisational structure and supply chains

Brunel Australia Holdings Pty Ltd and its subsidiaries ("Brunel Australia") is a wholly owned subsidiary of Brunel Energy Holdings B.V., which in turn is wholly owned by Brunel International N.V., (combined group "Brunel") a public company listed on Euronext Amsterdam.

Since our first engineering placement in 1975 by our founder Jan Brand, Brunel has evolved into a global workforce solutions partner with more than 12,000 employees across 45 countries. In Australia we recruit, deploy and manage personnel predominantly for the Renewable and Conventional Energy, Life Sciences, Mining, Infrastructure, Defence and Life Sciences sectors. During the 2024 reporting period Brunel Australia operated from offices in Perth, Brisbane and Melbourne, employing an average of ~110 internal staff and on hiring approximately 1,000 contractors and consultants to client projects nationwide.

[You can read more about Brunel and our services at brunel.net.](https://brunel.net)

Our supply chain extends across a range of sectors. Principal categories are:

- information technology and cloud hosting services;
- professional and office support (travel, accommodation, legal, financial and insurance services);
- external recruitment and pre employment screening providers;
- personal protective equipment (PPE) and other safety materials; and
- office site services such as cleaning and waste management.

Reporting entities covered by this statement

In line with Section 16 of the Australian Modern Slavery Act 2018 ("The Act"), this statement outlines Brunel Australia's approach to tackling modern slavery for the year ending the 31st of December 2024. This statement applies to Brunel Australia Holdings Pty Ltd and the following wholly owned Australian subsidiaries (together, "Brunel Australia"):

- Brunel Energy Pty Ltd
- SES Labour Solutions Pty Ltd trading as Brunel Mining
- SESLS Industrial Pty Ltd
- Advance Careers International Pty Ltd
- Brunel Construction and Maintenance Services Pty Ltd (dormant)
- Brunel Technical Services Pty Ltd (dormant)

Consultation occurred through the shared governance structure across these entities. Each entity operates under the same Board of Directors, which reviewed and approved the statement as a consolidated document on behalf of all group entities listed. No additional consultation processes were required.

“Our genuine passion for people

underpins everything we do, enabling us to secure exceptional talent and match each individual with roles that fit their skills and ambitions. Maintaining this diverse network demands disciplined governance that safeguards human rights at every level.”



Tania Sinibaldi
Managing Director of Operations
Australasia & Americas



Training and capacity building

Brunel Australia remains committed to training our employees and raising awareness about modern slavery issues. Our efforts include:

- **Induction Training:** All new employees receive training on modern slavery risks as part of their induction process. This past reporting year we welcomed Advance Careers into the Brunel Australia structure. Each employee of Advance Careers undertakes the same training as the rest of the group and were required to complete the Modern Slavery training in 2024.
- **Annual Refresher Courses:** Compulsory annual modern slavery training for all staff to ensure they remain informed about current issues, trends, and legislative developments.
- **Utilisation of External Resources:** We leverage resources from our RCSA membership and labour hire licensing authorities in those states we are required to hold a license in order to provide comprehensive training materials and webinars for staff.
- **Internal Communication:** Regular updates and communications to staff about modern slavery risks, policies, and procedures via our internal learning management system, 'BeSmart' and senior management team.

Governance and policy framework

Brunel endorses the ILO conventions. Aligned policies include – Code of Conduct, Equal Opportunity, HSE, Fitness for Work, Privacy and a dedicated Modern Slavery Policy – which embed those commitments across our day-to-day operations. All policies are available via our intranet and in the employee handbook for our staff and on-hired personnel to access.

Our corporate values – Entrepreneurship, Integrity, Results-Driven and Passion for People – underpin the Group's stance that any form of forced or child labour is incompatible with business success.

Brunel Australia's integrated management system is independently certified to ISO 9001 (quality management) and ISO 45001 (occupational health & safety), providing an established framework for continual improvement and worker welfare.

"Brunel's policies explicitly prohibit forced labour, child labour, and modern slavery across all regions and all operations. These commitments are outlined within Brunel's Code of Conduct policies are supported by ongoing monitoring and continuous improvements aimed at preventing labour violations.

Brunel's adherence to ILO conventions strengthens its prohibition of forced labour, child labour, and other unethical labour practices, underscoring a strict stance on human rights across its workforce and value chain."

Risk assessment

We apply a structured, detailed methodology that evaluates:

- **Sector risk:** (e.g. manufacture of PPE, international logistics);
- **Geographic risk:** using the Global Slavery Index and ILO indicators; and
- **Entity level risk:** based on the maturity of the supplier and its own human rights controls.

During 2024 we tripled the prior year's risk assessments completed. The assessments we have conducted to date now bring our total sample to greater than 30% of our annual spend with suppliers. Of our total spend less than 7% of that is with suppliers that provide services in industries that are considered high risk per the ILO conventions and related instruments. Brunel Australia's assessment purely beyond high-risk industries is an indication of our commitment to ensure Modern Slavery is not occurring in any areas of our supply chain. New categories examined included insurance brokerages, preemployment medical providers, human resources software solutions and job advertising platforms.

"Additionally, Brunel's due diligence process include regular audits and risk assessments of our operations and those of our partners to identify and mitigate risks of forced or compulsory labour, ensuring a safe and ethical working environment for all workforce members."

Brunel Annual Report 2024

Due diligence in practice

Brunel Australia has developed comprehensive due diligence systems to identify, mitigate, and prevent modern slavery within our business and supply chain. These processes include:

- **Supplier Questionnaire Development:** distributed to all suppliers assessed as medium to high risk, in line with our ISO 9001 (quality) and ISO 45001 (occupational health & safety) accredited management systems.
- **Targeted Supplier Follow-up:** supplementary enquiries or evidence requests where responses indicated policy gaps or limited transparency.
- **Risk Rating Matrix and Gap Analysis:** we use an internal matrix to evaluate supplier responses and flag potential areas of concern, such as the absence of a modern slavery policy or statement. In these cases, we engage further with the supplier to assess whether their operations present an elevated risk, taking additional steps as necessary.
- **Staff Communication and Training:** we leverage our RCSA membership to support employee awareness, offering webinars and reference materials across the organisation.
- **Annual Modern Slavery Training:** all employees must complete mandatory annual training on modern slavery. This enhances their understanding of risk indicators and reinforces their role in identifying and escalating potential concerns.

Supplier relationships and contracts

"Brunel is committed to upholding human rights and labour standards across its global workforce, aligning with international frameworks such as the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises. These commitments are embedded in the company's Code of Conduct, DIB Policy, and Health, and Safety Policy, which collectively establish clear expectations for ethical conduct, fair treatment, and safe working conditions."

Brunel Annual Report 2024

Brunel Australia's approach to engaging with suppliers is centred on upholding the highest standards of ethical conduct and legal compliance, aligned with our core values. Our Supplier Code of Conduct sets clear expectations for all current and prospective suppliers, ensuring adherence to the principles of the Modern Slavery Act 2018 (Cth) and the promotion of fair, sustainable, and responsible business practices.

As part of a condition to trading with Brunel Australia suppliers agree to these standards, some of which are captured below:-
Governance and Ethics: Suppliers are required to comply with all relevant legal and regulatory requirements in all areas of their business and operations. This includes adhering to ethical practices and upholding the highest standards of corporate governance.

- **Modern Slavery:** Suppliers must operate in accordance with the Modern Slavery Act 2018 (Cth) where applicable, and must reject all forms of modern slavery, including forced labour, human trafficking, and any practices that exploit individuals.
- **Health, Safety & Environment:** Suppliers must comply with all applicable laws and regulations regarding working conditions and environmental protection. They must ensure that workers are provided with a safe and healthy work environment, adhering to all relevant occupational health and safety standards.
- **Harassment, Discrimination & Bullying:** Neither Brunel Australia's employees nor our suppliers should be exposed to any behaviour or sequence of behaviours that unfairly offend, humiliate, intimidate, belittle, undermine, scare, exclude, or embarrass anyone it is directed at, or anyone who sees or overhears it. This includes a strict prohibition against any form of discrimination or bullying.
- **Anti-Bribery & Corruption:** Brunel Australia maintains a zero-tolerance approach to bribery and corruption. Suppliers are expected to act legally, fairly, and with integrity in all business dealings, adhering to anti-bribery and anti-corruption laws and policies. In addition to the Supplier Code of Conduct, Brunel Australia's standard terms of business with clients include contractual commitments to abide by all applicable laws and regulations.

These terms explicitly require suppliers to:

- **Provide a Safe Working Environment:** Suppliers must ensure a safe working environment for contract personnel, including reasonably practicable interventions to minimise the likelihood of sexual harassment or assault while on assignment with the client.
- **Comply with Health and Safety Laws:** Suppliers must comply with all applicable occupational health and safety and environmental laws, as well as all relevant industry-specific codes, guidelines, and standards relevant to occupational health and safety.

Through these comprehensive policies and contractual commitments, Brunel ensures that all suppliers and business partners operate within a framework that prioritises human rights, safety, ethical conduct, and compliance with legal standards. This approach supports our broader efforts to create a fair, transparent, and just supply chain, consistent with Brunel's corporate values and commitment to sustainability and social responsibility.



Measuring effectiveness

We regularly review and refine the actions and processes we have implemented to combat modern slavery. Methods used to monitor and measure effectiveness include:

- **Procurement and Supply Chain:** Evaluating our supplier assessment questionnaire responses to ensure compliance and identify potential risks. 100% of suppliers approached in 2024 completed our risk assessment questionnaire.
- **Governance and Due Diligence Framework:** Continuous review and updating of our Modern Slavery Policy to reflect the latest practices and legislative changes.
- **Internal Training Methodology:** Annual reviews and updates to the training material for internal staff to ensure it includes the latest statistics, new legislative developments, and additional information on our responsibilities. 100% of employees completed our annual module.
- **Incident Reporting:** Zero substantiated cases of modern slavery were reported via the SpeakUp line or other channels during the period.

For suppliers identified as high risk, we mandate the completion of our modern slavery assessment questionnaire as a condition for doing business with Brunel Australia. We have adopted a strict stance on this requirement and are prepared to terminate contracts with non-compliant suppliers. Again, in 2024 no supplier contracts have been terminated due to non-compliance with this requirement, indicating the effectiveness of our strategy. Responses have revealed a low risk of modern slavery within our supply chains. Where a high risk has been identified based on the answers of the assessment, we have been satisfied with the additional answers to our questions where we felt no further investigation was required from our targeted supplier follow up.

Collaboration and partnerships

Brunel Australia collaborates with external organisations and industry bodies to strengthen our efforts against modern slavery. Notable collaborations include:

- **RCSA Corporate Membership:** As an RCSA Corporate Member, we adhere to the RCSA Code for Professional Conduct, which includes commitments to safeguard work seekers from exploitation and conduct business ethically.
- **Industry Peers:** Engaging with industry peers to share best practices and develop collective solutions to combat modern slavery.

Through these collaborations, Brunel Australia demonstrates its commitment to collective action and continuous improvement in addressing modern slavery risks.

Reporting and grievance mechanisms

Brunel has established robust reporting mechanisms for instances of modern slavery. Employees and external stakeholders can raise concerns or report suspicions of modern slavery through:

- **Whistleblowing 'SpeakUp' Line:** An anonymous hotline for reporting concerns, including those related to modern slavery.
- **Grievance Handling Policy:** A structured policy for addressing grievances related to modern slavery, ensuring thorough investigation and appropriate action.

All allegations are investigated by the Head of Legal and reported quarterly to the parent company board & risk committee and addressed appropriately.

These channels ensure that all reports or concerns relating to modern slavery are treated with the utmost seriousness, investigated without delay, and addressed in accordance with Brunel's governance processes and commitment to ethical conduct.

"Our whistleblower policy also includes a strong non-retaliation commitment, protecting employees who raise concerns from any adverse consequences, which reinforces trust in Brunel's process for resolving human rights issues and maintaining a fair work environment."

A large background image showing a field of wind turbines at sunset. Two workers in hard hats are in the foreground, looking at a tablet. The sun is low on the horizon, creating a warm glow and silhouettes of the turbines and workers.

Future actions and targets

Brunel Australia remains committed to advancing its modern slavery prevention efforts in the year ahead. Key initiatives for 2025 include:

Deep dive-audits: for any suppliers identified as high risk in 2025 including on-site verification where feasible.

Updated Modern Slavery Policy: update our Australian Modern Slavery Policy so that all terminology, governance references and commitments mirror the Brunel Global Human Rights Policy (April 2025).

Collaboration: renewal of our membership and continue to engage with our industry body (RCSA) on data and best practice across the recruitment sector.

Supplier Assessments: Bring assessments to greater than 40% of whole supply chain spend.

This Modern Slavery Statement has been prepared in accordance with the Modern Slavery Act (Cth) 2018 and has been approved by the Board of Directors of Brunel Australia Holdings Pty Ltd and its subsidiary entities on Tuesday the 3rd of June 2025.



Tania Sinibaldi
Managing Director, Australasia
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