

Brunel

Modern Slavery Statement

Brunel Australia Holdings Pty Ltd and subsidiaries



1. 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.

Founded in 1975 by Jan Brand, Brunel International N.V. has grown from a single engineering placement into a global workforce solutions business operating across 45 countries with 11,000 employees worldwide. In Australia, we specialise in the recruitment, deployment and management of technical and professional personnel for clients in the Renewable and Conventional Energy, Life Sciences, Mining, Infrastructure and Defence sectors. Our workforce solutions encompass permanent recruitment, casual on-hire, independent consulting and employer-of-record arrangements, reflecting the diverse and evolving needs of the industries we serve.

Throughout the 2025 reporting period, Brunel Australia maintained offices in Perth, Brisbane, Melbourne and Sydney. Our internal workforce averaged approximately 110 employees, while over 800 contractors and consultants were engaged on behalf of clients across the country at any given time.

You can read more about Brunel and our services at www.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 2025. 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 for this Statement was conducted at a group level, consistent with the unified governance structure that applies across all listed entities. All group entities operate under a shared Board of Directors, which has reviewed and approved this Statement on behalf of the consolidated group. This approach reflects the integrated nature of the group's operations and ensures consistent oversight of modern slavery risks across all entities.



**“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*

2. Governance and policy framework

Brunel Australia's governance framework for modern slavery sits within a broader global human rights architecture. Aligned with the ILO conventions and the UN Guiding Principles on Business and Human Rights, Brunel maintains a suite of policies – including our Code of Conduct, Equal Opportunity, HSE, Fitness for Work, Privacy and dedicated Modern Slavery Policy – each of which reinforces our zero-tolerance position on the exploitation of workers.

These policies are accessible to all internal employees and on-hired personnel through the Brunel intranet and employee handbook.

A significant governance milestone was reached during 2025, when Brunel Australia's Modern Slavery Policy (HR-POL-004-ALL-AUS) was revised to Revision 2. This update was undertaken specifically to align the policy with the Brunel Global Human Rights Policy (2025), incorporating the UN Guiding Principles on Business and Human Rights and the ILO Fundamental Conventions, and materially strengthening the governance, escalation and continuous improvement obligations applicable to our Australian operations.

Brunel's four corporate values – Entrepreneurship, Integrity, Results-Driven and Passion for People – form the cultural bedrock of our approach. They reflect a fundamental conviction that sustainable business success and respect for human rights are not competing interests but mutually reinforcing ones. Any form of forced or child labour is irreconcilable with those values.

Brunel Australia's integrated management system is independently certified to ISO 9001 (quality management), ISO 45001 (occupational health & safety) and ISO 14001 (environmental management) providing an established framework for continual improvement, worker welfare and the responsible oversight of our operations and supply chain; including the environmental and social conditions under which our suppliers operate.

"We strictly adhere to labour standards and prohibit forced labour, child labour, modern slavery, or any labour that violates ILO conventions.

Our code of conduct emphasises this commitment, and we are continuously improving our efforts to prevent forced labour...

We are committed to endorsing the ILO principle of effectively abolishing child labour, which entails ensuring that every child has the opportunity for full physical and mental development."



Training and capacity building

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

- **Brunel induction:** Modern slavery awareness forms part of the mandatory induction programme for all new Brunel Australia employees, regardless of entity or role. All group entities operate under a consistent onboarding framework. No employee has formally completed their induction without completing the modern slavery training module.
- **Annual training:** All employees are required to complete a mandatory modern slavery refresher module each year. Training content is reviewed annually to incorporate current risk data, legislative developments and any changes to Brunel's policy framework. In 2025, 100% of employees completed this requirement.
- **External resources:** Brunel Australia draws on external expertise to supplement internal training capacity. Through our RCSA Corporate Membership, we access sector-specific guidance, webinars and reference materials developed for the recruitment industry. We also engage with labour hire licensing bodies in the relevant states to ensure our practices align with regulatory expectations on worker protection.
- **Communications:** Modern slavery awareness is maintained throughout the year through targeted communications distributed via our internal learning management system, Brunel Academy, and through the senior management team. This ensures that evolving risks and policy updates reach staff between formal training cycles.

3. Risk assessment

Risk assessments are conducted across both Brunel Australia's direct operations and its supply chain, including entities owned or controlled by Brunel Australia. Our methodology applies a three-dimensional evaluation framework:

- **Sector risk:** assessed against known ILO high-risk industries, including the manufacture of goods with complex offshore supply chains such as PPE, and services reliant on transient or unskilled labour;
- **Geographic risk:** benchmarked against the Walk Free Foundation's Global Slavery Index and ILO prevalence indicators, with heightened scrutiny applied to any supplier with operations in jurisdictions where labour rights protections are weak; and
- **Entity level risk:** evaluated by reference to the supplier's own governance maturity, including whether it has adopted modern slavery policies, conducts its own due diligence, provides staff training, and maintains a grievance mechanism accessible to its workers.

During 2025, we continued to build on the momentum of prior reporting periods, increasing the proportion of whole supply chain spend subject to formal assessment to greater than 40% which delivered on a target set in our 2024 Statement. Of our total assessed spend, less than 6% relates to suppliers operating in industries considered inherently high risk under ILO conventions and related instruments. Brunel Australia's practice of assessing beyond recognised high-risk industry categories reflects our commitment to ensuring modern slavery is not occurring in any part of our supply chain.

One supplier was identified as elevated risk during this period, consistent with findings from the prior reporting year. The basis for elevated risk classification in both cases was the absence of formal policies and procedures to identify and manage modern slavery within their own supply chains.

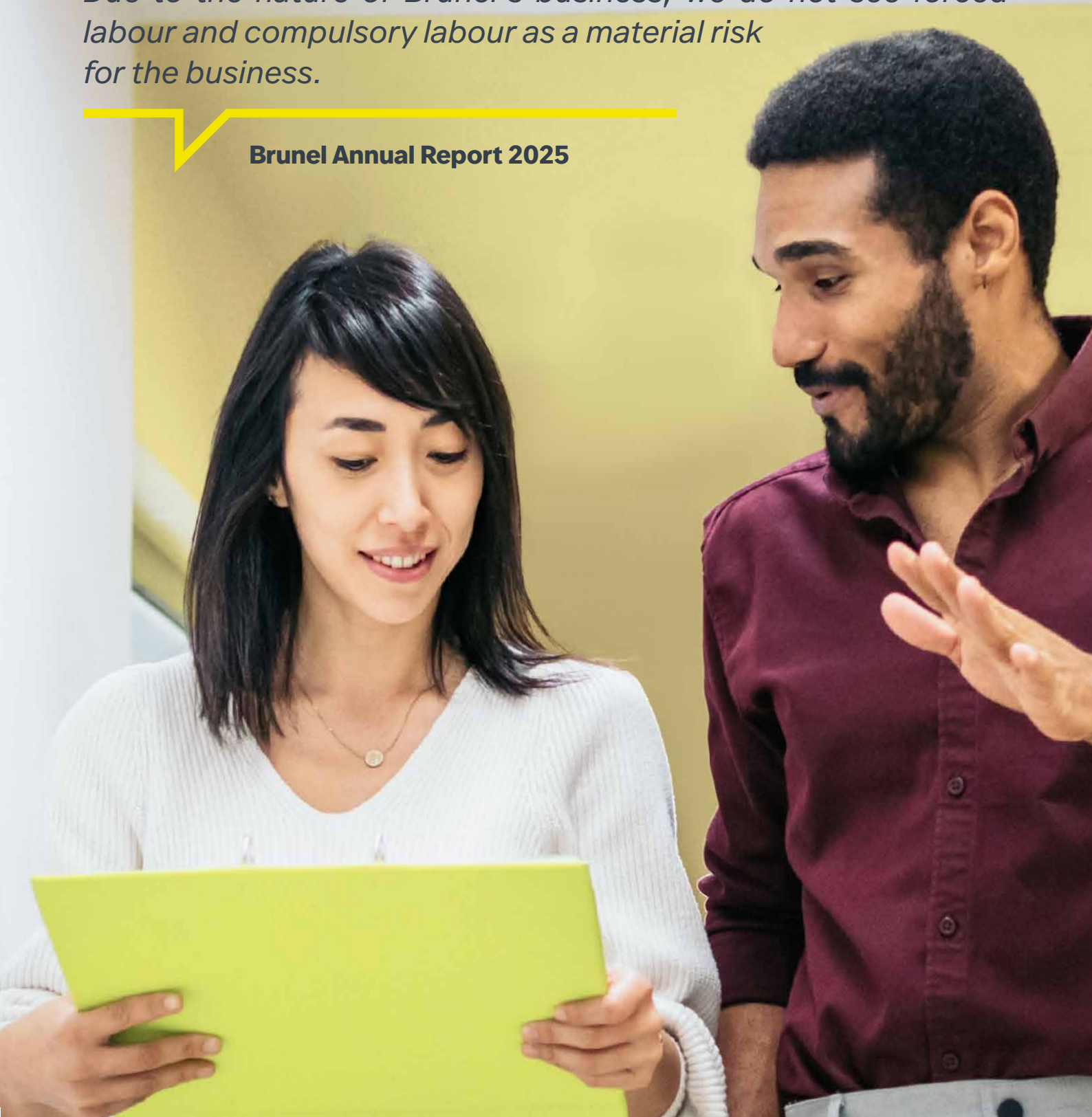
Following targeted follow-up engagement, including site visits for this reporting year, both suppliers were assessed as presenting a low substantive risk of modern slavery. Both are professional services organisations (one in insurance and one in building management services) operating without an extensive or geographically complex supply chain that would materially increase modern slavery exposure. Both suppliers have been encouraged to adopt formal policies as a commitment to their verbal rejection of modern slavery in all its forms, and their progress will be reviewed during the 2026 reporting period.

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 and are supported by ongoing monitoring and continuous improvements aimed at preventing labour violations.

Due to the nature of Brunel's business, we do not see forced labour and compulsory labour as a material risk for the business.

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4. Due diligence in practice

Brunel Australia operates a structured due diligence framework designed to identify, assess, address and, where necessary, remediate modern slavery risks across our own operations, the operations of entities we own or control, and our broader supply chain. The key components of this framework are as follows:

- **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:** where questionnaire responses indicate policy gaps, inconsistencies or limited transparency, we issue supplementary enquiries or evidence requests to the relevant supplier. This targeted engagement allows us to distinguish between suppliers that lack formal documentation but present genuinely low risk, and those where substantive concerns warrant escalation.
- **Risk rating matrix and gap analysis:** supplier questionnaire responses are evaluated against an internal risk rating matrix that scores each supplier across the three risk dimensions described in Section 3. The matrix flags elevated-risk suppliers for further action and documents the basis for each rating decision, providing an auditable record consistent with our ISO-accredited management systems. Where a supplier is rated high risk, a gap analysis is completed and a corrective action plan issued.
- **Staff communication and training:** employee awareness is actively maintained through our RCSA membership, which provides access to recruitment-sector-specific webinars, updated guidance materials and peer engagement on emerging modern slavery risks. These resources supplement our internal training programme and ensure our staff remain up-to-date on industry-level developments.
- **Annual modern slavery training:** all employees complete mandatory annual training covering modern slavery risk indicators, Brunel's reporting obligations, and individual responsibilities for identification and escalation. Training content is reviewed each year to reflect current legislative and operational context. Completion is tracked and reported to the senior management team.

5. Remediation

No substantiated instances of modern slavery were identified within Brunel Australia's own operations or supply chain during the 2025 reporting period. Where suppliers are identified as elevated risk, Brunel Australia's response is calibrated to the nature and severity of the risk identified.

In 2025 this involved targeted follow-up engagement, site visits and encouragement to formalise policies consistent with each supplier's verbal rejection of modern slavery. Brunel Australia's broader remediation framework, applicable where more serious concerns are identified, provides for formal corrective action requirements with defined timeframes, and potential suspension or termination of the supplier relationship where compliance is not achieved.

In the event should a worker's welfare be found to be at immediate risk, Brunel Australia would engage relevant authorities and, where possible, support the worker's access to appropriate services.

6. Supplier relationships and contracts

Contractual frameworks are a key lever in Brunel Australia’s approach to modern slavery risk management. All suppliers are required to operate in accordance with Brunel Australia’s Supplier Code of Conduct as a condition of engagement.

The Code sets binding minimum standards on ethics, labour rights, health and safety, anti-discrimination and anti-bribery, and requires suppliers to reject all forms of modern slavery in their own operations and supply chains.

Key obligations imposed on suppliers under the Code and Brunel Australia’s standard commercial terms include:

- **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.
 - **Anti-bribery and 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.
 - **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 and 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 and 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.
- 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 our staff who visit their worksite and our contract personnel whom work under their systems, 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.

Taken together, these contractual and policy obligations establish a clear baseline of expected conduct for every party in Brunel Australia’s supply chain.

They provide a defined framework against which supplier behaviour can be assessed and create enforceable grounds for remediation or exit where non-compliance is identified.

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

7. Measuring effectiveness

Assessing whether our actions are genuinely effective is a core obligation under the Act and a central part of our continuous improvement approach. We evaluate effectiveness through both quantitative indicators and qualitative assessment of outcomes, as set out below:

- **Procurement and supply chain:** In 2025, 100% of suppliers approached to complete the self-assessment questionnaire did so. Questionnaire coverage now exceeds 40% of total supply chain spend, delivering on the target set in our 2024 Statement. The high completion rate demonstrates that our supplier engagement approach is effective and that suppliers understand and accept the obligation as a condition of trading with Brunel Australia.
- **Governance and due diligence framework:** The revision of our Modern Slavery Policy to Revision 2 in July 2025 represents a meaningful strengthening of our governance framework, not a routine administrative update. The revised policy fully mirrors the Global Human Rights Policy (2025) and introduces clearer escalation pathways and accountability assignments for Australian operations. Its adoption by the Board demonstrates organisational commitment at the highest level.
- **Internal training methodology:** 100% of employees across all group entities completed the mandatory annual modern slavery training module in 2025. Training materials were reviewed and updated during the period to incorporate recent developments, including the appointment of the inaugural Australian Anti-Slavery Commissioner (December 2024). The sustained 100% completion rate across multiple reporting periods indicates that training is operationally embedded rather than aspirational.
- **Incident reporting:** No complaints or allegations relating to modern slavery were received via the SpeakUp whistleblower line or any other reporting channel during 2025. While a nil-return is a positive outcome, Brunel Australia acknowledges that the absence of reports does not, of itself, confirm the absence of risk. It is one indicator among several, and we continue to treat proactive due diligence as the primary assurance mechanism rather than relying on reactive reporting alone.

Supplier engagement outcomes are the clearest indicator of whether our risk classification and follow-up mechanisms are functioning as intended. For suppliers assessed as elevated risk, completion of the self-assessment questionnaire is a condition of continued supply, and Brunel Australia has maintained this position consistently.

In 2025, no supplier relationships were terminated on modern slavery grounds. One supplier carried forward as elevated risk from the prior reporting period along with a supplier in this period were subject to site visits during 2025. Both were assessed as presenting a low substantive risk of modern slavery, given the professional services nature of their operations and the absence of an extensive or geographically complex supply chain that would materially increase modern slavery exposure.

Each supplier has verbally rejected modern slavery in all its forms and has been encouraged to formalise that commitment through the adoption of written policies. Their progress in doing so will be reviewed during the 2026 reporting period, providing a practical measure of whether our engagement approach supports genuine governance improvement at the supplier level rather than merely recording a risk classification.

Following targeted follow-up engagement, including site visits for this reporting year, both suppliers were assessed as presenting a low substantive risk of modern slavery. Both are professional services organisations (one in insurance and one in building management services) operating without an extensive or geographically complex supply chain that would materially increase modern slavery exposure. Both suppliers have been encouraged to adopt formal policies as a commitment to their verbal rejection of modern slavery in all its forms, and their progress will be reviewed during the 2026 reporting period.



Collaboration and partnerships

Brunel Australia recognises that addressing modern slavery effectively requires engagement beyond our own operations. We actively participate in external collaborations that strengthen the collective response across the recruitment sector:

- **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.

8. Reporting and grievance mechanisms

Brunel Australia maintains accessible and confidential reporting channels for all employees, on-hired workers and external stakeholders. Any person who suspects that modern slavery may be occurring - whether within Brunel Australia's operations or in the broader supply chain - is encouraged to report their concerns through the following mechanisms:

- **Whistleblowing 'SpeakUp' line:** an anonymous, confidential reporting channel available to all employees, on-hired workers and external stakeholders. Reports may be made by phone or online, in multiple languages, and are handled with strict non-retaliation protections for the reporting party.
- **Grievance handling policy:** a documented process for receiving, investigating and resolving grievances, with defined timelines, escalation pathways and requirements for remedial action where a concern is substantiated.

All concerns raised are investigated by the Head of Legal, with findings reported quarterly to the Brunel International parent company Board and Risk Committee. Where a concern is substantiated, the matter is addressed promptly and proportionately, including corrective action, supplier remediation or referral to relevant authorities as appropriate.

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.

'Brunel fosters active engagement with its workforce on human rights and labour standards. Engagement is facilitated through the SpeakUp line, which operates with a strong non-retaliation commitment, protecting employees who raise concerns from any adverse consequences. This reinforces trust in Brunel's processes for resolving human rights issues and maintaining a fair working environment.'

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9. Future actions and targets

Building on the progress made during 2025, Brunel Australia has identified the following concrete commitments for the 2026 reporting period. Each initiative has been assessed for feasibility and is considered achievable within the year, consistent with our available resources and operational context:

- **Supplier follow-up:** revisit the two suppliers identified as elevated risk during 2024 and 2025 to assess whether they have acted on the encouragement provided to formalise their commitment to the elimination of modern slavery through the adoption of written policies and procedures. Each supplier will be given the opportunity to demonstrate progress made since engagement. Where a supplier has not taken meaningful steps to formalise its position, Brunel Australia will consider what further action is appropriate. Outcomes will be reported in the 2026 Statement.
- **Supplier self-assessment questionnaire review:** revise the supplier self-assessment questionnaire to deepen its analytical scope and ensure cross-functional alignment with Brunel Australia's accredited management systems. Proposed enhancements include additional questions addressing sub-tier supply chain visibility, geographic sourcing risk in high-risk jurisdictions, and worker recruitment practices - specifically whether suppliers engage labour hire intermediaries and whether recruitment fees are passed to workers, which is a recognised modern slavery indicator under ILO guidance. The revised questionnaire will also incorporate environmental management questions to reflect Brunel Australia's recent ISO 14001 (environmental management) certification, ensuring consistency across our ISO 9001 (quality), ISO 45001 (occupational health & safety) and ISO 14001 accredited management systems. The revised questionnaire will be aligned with the Brunel Global Human Rights Policy (2025) and deployed for the 2026 assessment cycle.
- **Collaboration and intelligence:** register with the Australian Anti-Slavery Commissioner's communications and engage with the Commissioner's published business guidance as a free, legislation-aligned intelligence resource; evaluate subscription to a third-party supplier risk screening platform (such as Sedex or equivalent) to provide an additional layer of supply chain intelligence to our risk assessment process, with a view to implementation by year-end 2026. Continue renewal of our RCSA Corporate Membership and engagement with that body on modern slavery data and best practice across the recruitment sector.
- **Supplier assessments:** extend formal modern slavery assessment coverage to more than 50% of total supply chain spend by year-end 2026, continuing the trajectory of growth from 30% (2024) to 40%+ (2025). Priority will be given to spend categories not yet assessed, including any new supplier relationships established during the period.



10. Board approval

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 the 30th of April 2026.

Tania Sinibaldi
Managing Director of Operations
Brunel Australia

Querida Swinnerton
Director - ANZ
Brunel Australia

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