



THIESS

2021



JOINT MODERN SLAVERY
STATEMENT

1 January 2021 – 31 December 2021

Acknowledgement of Country

This statement was produced on the lands of the Yuggera and Turrbal People. At Thiess, we honour and respect Aboriginal and Torres Strait Islander peoples as having the longest continuous culture on earth.

We recognise Aboriginal and Torres Strait Islander peoples as the Traditional Owners and Custodians of this land, and pay our respects to the Elders past, present and emerging for they embrace the memories, traditions and culture of Australia.

As a global services provider, we acknowledge and respect the history and contributions of First Nations peoples. Across our offices and sites, we recognise and value our responsibility to live and work on country, and with communities, respectfully and with care.

About this statement

Thiess supports the recognition of human rights as stated in the UN Guiding Principles on Business and Human Rights. We are committed to abiding by the ten principles of the UN Global Compact and contributing to the UN Sustainable Development Goals (UN SDGs).

This is our first Modern Slavery Statement under the Australian Government’s Modern Slavery Act 2018 (Cth) since introducing Elliott Advisors (UK) Ltd (**Elliott Advisors**) as our 50 per cent shareholder alongside CIMIC Group Limited (**CIMIC**). Prior to this, the CIMIC Joint Modern Slavery Statement for the period 1 January 2020 to 31 December 2020 included reporting on behalf of Thiess.



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Statement development and approval

Thiess' Modern Slavery Statement for the period 1 January 2021 to 31 December 2021 has been prepared as a joint statement on behalf of all reporting entities¹ (Appendix A) and is made pursuant to sections 14 and 16 of the *Modern Slavery Act 2018* (Cth).

Preparation of this Modern Slavery Statement has been managed by the Thiess Modern Slavery Working Group integrating people, procurement, risk, legal, compliance, sustainability and communication specialists. Consultation occurs between members of the working group and their counterparts in our regional operations and operational reporting entities, with a collaborative approach taken to implement and verify the year's modern slavery activities, confirm reporting requirements and collate data for this statement.

For the purpose of this statement, Thiess refers collectively to all the reporting entities and their controlled entities.

This statement has been reviewed and approved by the Board of Thiess Group Holdings Pty Ltd as the parent entity on 6 June 2022 and the Executive Chairman and Chief Executive Officer of Thiess Group Holdings Pty Ltd.



¹ Reporting entities are defined in the Australian *Modern Slavery Act 2018* (Cth) as an entity which has a consolidated revenue of at least AU\$100 million for the reporting period, if the entity is an Australian entity at any time in that reporting period or carried on business in Australia at any time in that reporting period.



Executive Chairman & CEO Message

I am pleased to share Thies's 2021 Modern Slavery Statement – our first as a standalone business.

Thies started 2021 with a new ownership structure, a new Board and a fresh opportunity to develop our approach to modern slavery, and sustainability more generally, under the Thies brand.

For us, sustainability is about integrating environmental, social and governance (ESG) considerations into our decision making, everyday. Our commitment is outlined in our [2021 Sustainability Report](#) which was published on 29 April 2022, alongside the [Thies Climate Report](#), which includes our first ever report aligned with the Taskforce on Climate-Related Financial Disclosure (TCFD).

Guided by our own Principles of integrity, accountability, innovation and delivery, we align with the United Nations' (UN) Guiding Principles on Business and Human Rights. And we are committed to abiding by the principles of the UN Global Compact, the International Labour Organisation's standards and contributing to the UN Sustainable Development Goals (UN SDGs).

Modern Slavery in 2021

We recognise that in delivering mining services globally we operate in some geographies, sectors and supply chains that may have an elevated exposure to the risk of modern slavery. This demands a high standard of vigilance in meeting our obligations.

To assess and address modern slavery risks we are guided by our new [Modern Slavery Policy](#), in consultation with our Modern Slavery Working Group, which was established in 2021. We leverage our strong governance, compliance and people frameworks to ensure we apply a disciplined and consistent approach across our operations.

In 2021, our focus was on understanding the potential risks in our supply chain, mapping out and building the foundations for ongoing risk-based analysis and engagement with supply chain management to address modern slavery risks.

We also finalised the Human Rights Impact Assessment (HRIA) of our Mongolian operations to identify, understand and assess the current state of our operations. Originally planned as an integrated desktop and in-country review of our operations, the review was conducted remotely due to the impact of COVID-19 and restrictions on global travel.

The implementation of our new regional model in 2021 ensures we are making our decisions closer to our clients, our people and our communities – and will assist us to have a clearer understanding of regional modern slavery risks across our business.

This Modern Slavery Statement outlines in more detail the actions we've taken during the last financial year to identify and address modern slavery risks associated with our business.

Looking ahead

Our purpose at Thies – to create lasting value – has never been more pressing. We have an urgent imperative to step up for all generations, helping lead sustainable, responsible mining that drives positive impact for our people, clients, partners, suppliers, local communities and the environment.

In 2022, as we embark on our most exciting transition at Thies, for a sustainable future, we are aware of the challenges and opportunities this presents. We appreciate the significant opportunity our choices have to enable and enhance social value. And we remain steadfast in our commitment to constantly review, adapt and improve our approach to modern slavery, especially as our business evolves.

We are committed to driving and maintaining the conversation around human rights with our people, clients, suppliers, and stakeholders across our regions, to reduce and mitigate social impacts, and proactively and collaboratively build a more sustainable future for all.

We look forward to sharing our progress and learnings.

Michael Wright

Executive Chairman and CEO Thies

This statement is signed by Michael Wright as Executive Chairman and Chief Executive Officer of Thies Group Holdings Pty Ltd on 27 June 2022.

Michael Wright
Thies Executive Chairman and Chief Executive Officer
Thies Group Holdings Pty Ltd

Resources services leader

About Thiess

Thiess has delivered mining, construction and services solutions in regional communities and urban cities around the world for more than 85 years. At our core is the pioneering spirit of the legendary Thiess brothers. Their vision defined firsts, unlocked possibilities and found smarter ways to scale what mattered to society. Their story became our DNA.

In 2021, we worked with clients in Australia, Asia and the Americas, providing services to mining projects. Our people draw on our global insight to create local advantages for each project; develop tailored, optimised solutions in response to each client's goals; and ensure certainty of delivery in each context.

As our industry evolves, Thiess is also evolving – in the markets we pursue, the services we offer and the value we deliver as we help our clients transition to more sustainable mining and pursue a low carbon future.

Throughout, we will continue to invest in our people, supporting their development and unlocking new opportunities to upskill and retrain. Today, we employ more than 12,200 people across our global operations.



Our operations and supply chain

In 2021, we delivered specific work packages and life-of-project operations for our clients – from developing greenfield projects through to mine closure and rehabilitation. Throughout delivery, our teams draw on our extensive engineering expertise and proven systems to fast-track problem solving with rigorous cost and schedule control. This is amplified by our ability to rapidly mobilise people, equipment and support services within and across international borders.

We engage with local communities, including Indigenous and First Nation peoples, to support our understanding of local modern slavery risks and the potential impact of our operations. As a contractor, we work with our clients to understand their social impact assessments and support their social impact management plans.

Operations



Thiess - Global Mining Services

Thiess partnered with its clients in 2021 to deliver excellence in mining services in Australia, Indonesia, Mongolia and Chile, and commenced expansion into the United States of America. Operations at our joint-venture operation in Botswana were demobilised in 2021.

Services provided to our clients included:

- **Engineering** - technical studies, design, planning, estimation
- **Extraction** - drill and blast, load and haul
- **Asset management** - strategy, maintenance, equipment hire
- **Rehabilitation** - design, develop, deliver
- **Enabling** - people, systems, health and safety, environment, community.

The Thiess India Hub provides technical support to Thiess' operations, including geotechnical and business process automation services, from our office in Gurugram, India.



FleetCo - Equipment Hire

FleetCo is a wholly owned business dedicated to providing equipment hire services assisting clients to achieve short and long-term objectives with tailored solutions. Thiess also supports its mining services business by providing equipment hire options for clients.

In 2021 Thiess and FleetCo provided equipment hire services in Australia, Chile, Indonesia and Canada.



RTL - Mining and Earthworks

Since August 2020, Thiess has held a majority ownership (88 per cent) in RTL Mining and Earthworks Pty Ltd (RTL). The remaining 12 per cent shareholding in RTL is held by Linfox Resources Pty Ltd. RTL provides mining, civil construction, heavy earthmoving plant hire services as well as general and over dimensional transport services in the Latrobe Valley, Victoria and surrounding regions in Australia. RTL does not provide services outside of Australia.

A process is underway to transition RTL to operate under Thiess policies and procedures. In 2021, RTL's policies and procedures were mapped against the equivalent Thiess systems and processes to support the transition.

Supply chain

Thiess has more than 3,750 direct domestic and international suppliers, with our key areas of spend including:

- Mining equipment
- Tyres
- Diesel fuel and lubricants
- Explosives
- Specialist skilled subcontractors such as diesel fitters, auto electricians, fire suppression, air conditioning and refrigeration, and other tradespeople
- Labour hire such as operators and trades
- Catering and camp services
- Professional services such as technical, financial, management and training
- Technology and telecommunications
- Personal protective equipment (PPE).

Thiess takes a local procurement approach that allows us to have a better relationship with, and understanding of, our suppliers. We prefer to source goods and services from businesses that operate within the countries where we operate. Where we identify opportunities for strategic global relationships, we prefer to establish global frameworks that facilitate local sourcing.

The goods and services we procure are those typically used in the mining, asset management and corporate sectors, with finished goods forming the bulk of goods purchased. Raw materials sourced directly from the manufacturer make up a small part of our purchases, with even fewer procured outside of the country in which we are operating. We generally do not manufacture our own products.

We procure services providing corporate support such as facilities and maintenance, accounting, legal and IT services, and professional consulting services such as design and engineering, all of which complement our own internal resources for either short or long-term engagements as required.



Understanding our modern slavery risks

We recognise that in delivering mining services internationally we operate in some geographies, sectors and supply chains that may have an elevated exposure to the risk of modern slavery. Modern slavery risks can be present in the resources sector due to the nature and location of operations and the complexity of supply chains. Common modern slavery practices in the resources industry include human trafficking, the worst forms of child labour, forced or unpaid work and bonded labour. This demands a high standard of vigilance in meeting our obligations.

Our understanding of the drivers, vulnerable groups and the hidden but pervasive presence of modern slavery, and our approach to address it, has been informed by the UN Guiding Principles on Business and Human Rights, the UN Global Compact, the UN SDGs and the International Labour Organisation's standards.

Our insight has also been informed by the Global Slavery Index (GSI), published by Walk Free, which measures the extent of modern slavery from country to country and the steps that governments are taking to respond. The GSI, together with our ongoing program of HRIAs and maturing supply chain risk assessments, help us to better understand the parts of our operations and supply chains that may present an elevated risk of modern slavery.

Operations risk

Supported by our governance and due diligence processes, we use HRIAs to assist our identification and understanding of human rights and modern slavery risks in our operations.

We prioritise the identification and addressing of modern slavery risks in geographies where an elevated risk has been identified, based on the relevant GSI and our internal assessment of our operations and supply chains.

Thiess mining services operations have the potential to present a higher risk of modern slavery when compared with the operations of FleetCo and RTL. To date we have undertaken HRIAs in our mining operations in Indonesia (2018) and Mongolia (2020-21), based on the elevated GSI rankings of the two countries and the extent and nature of our operations.

Country	Employees	Operations*	Prevalence Index Rating*	Vulnerability*	Government Response Rating*
Australia	4000+	11 Mining Projects 3 Offices 2 Rebuild Centres	163/167	4.27/100	BBB
Chile	420+	1 Mining Project 1 Rebuild Facility 1 Office	162/167	25.63/100	BBB
USA	80+	1 Mining Project 1 Office	158/167	15.88/100	BBB
Indonesia	6600+	7 Mining Projects 1 Rebuild Centre 1 Office	74/167	50.45/100	BB
India	45+	1 Office	53/167	55.49/100	B
Mongolia	270+	2 Mining Projects 1 Office	13/167	43.55/100	CCC

*Source: Global Slavery Index published by Walk Free: www.globalslaveryindex.org

Caption: Global Slavery Index for countries in which Thiess operates

FleetCo's equipment hire services pose a lower risk of modern slavery given the relatively limited number of people involved in providing the services and the countries in which FleetCo operates. However, we understand that the risks are higher when maintenance services are offered alongside equipment hire.

RTL's risk of modern slavery is considered to be low given the location of its operations in Australia, the residential nature of its workforce and the enterprise agreements in place.

More detail about our 2022 HRIA program is set out in the 'Looking ahead' section of this statement.

Supply chain risk

Informed by sources including the GSI country/sector risk ratings identified by our third-party screening tool and other industry insights, we consider the risk of modern slavery in Thiess' supply chain consistent with the industries and jurisdictions within which we operate as a mining services provider. While our risks are largely consistent with the broader resources industry, our sourcing approach as a mining services provider differs from owner miners or resource exploration businesses, who are more likely to source raw material from overseas manufacturers.

While we procure goods and services globally, highly skilled work and locally sourced goods present a lower risk of modern slavery. Certain low skilled services and imported goods have a higher risk of modern slavery, for example in the production of

garments, apparel, and personal protective equipment (PPE); the supply of raw materials, electronic products and steel fabrication, and the provision of certain services including labour hire, cleaning, freight and logistics.

In 2021, we mapped our supply chain to provide a better understanding of potential areas of modern slavery risk. The outcome of this assessment has informed our agenda for addressing modern slavery risks in our supply chain in 2022 and beyond.

CASE STUDY: Procurement mapping

In 2021, Thiess completed a high-level supply chain assessment across commodity, sector and country risks, as classified and rated within our supplier risk assessment tool. This mapping exercise supported the identification of two areas of parallel focus:

- **High Impact Suppliers:** a group of 43 of our largest suppliers (collectively comprising 54% of our global operational expenditure) who are global in their footprint and are regarded as having a high level of maturity in strategies for modern slavery risk in their operations and supply chains. Two of these, being large original equipment manufacturers (OEMs) of mining plant and equipment, have strong operational relationships with Thiess, operate out of different geographies and have supply chain challenges that include the sourcing of raw materials. In 2022, we intend to engage with these two suppliers as part of a broader ESG review that will include consideration of modern slavery risks.
- **High-Risk Suppliers:** a group of 16 suppliers who present a potentially higher modern slavery risk due to the nature of their business, the location of operations and/or the commodity being supplied. These suppliers represent 0.0017% of our operational expenditure. Our mapping classified suppliers in this category based on certain countries of manufacture (Chile, Indonesia and Mongolia), commodities (transport, computers, warehousing, and apparel) and sectors of manufacturing (raw materials, factories run by smaller OEMs). Two suppliers have been highlighted for further assessment: a transport road freight supplier in Chile and an Indonesian wholesaler of computer equipment. We intend to conduct at least one of these assessments in 2022 that will look to incorporate expertise from a third party to assist in developing and participating in the assessment.

We work with our suppliers to mitigate the likelihood of purchasing at-risk goods and services and inadvertently contributing to modern slavery. We do this in part through our due diligence processes, which include supplier screening, and using a suite of template commercial contracts with secondary supplier controls.

Assessing and addressing the risks of modern slavery

Our integrated approach

To assess and address modern slavery risks, Thies leverages our existing governance, compliance, procurement and people frameworks (inherited from CIMIC) to ensure we apply a disciplined and consistent approach across our operations. These tested and integrated frameworks support us to manage risk, assess performance and engage our people and suppliers. We also maintain an open, confidential and responsive grievance and reporting mechanism.

Our approach, due diligence and assurance are facilitated by collaboration between specialist functions including people, procurement, risk, legal, compliance, internal audit, sustainability and communication.

To enhance our ability to identify, mitigate and prevent the risk of modern slavery, and remedy any impacts that occur, we work through a cycle of action, evaluation and critical analysis and remediation. From this, we use evidence-based assessments of our practices and new initiatives to inform our planning and continual improvement steps.

Since introducing Elliott Advisors as our 50 per cent shareholder alongside CIMIC, we have commenced a process to review and where appropriate adapt CIMIC policies to suit the needs of Thies.

	Group alignment	Risk and performance management	Engagement and continuous improvement
GOVERNANCE	<ul style="list-style-type: none"> Principles Code of conduct Board Board Committees and Management Committees Policies and Procedures 	<ul style="list-style-type: none"> Risk Management Framework Management systems Committee Charters Group Governance System 	<ul style="list-style-type: none"> Audit & Risk Committee (Board Committee) Safety, Sustainability and Compliance Committee (Board Committee)* Reportable Conduct Group (Management Committee) Health, Safety & Environment Committee (Management Committee) Diversity and Inclusion Committee (Management Committee) Business Conduct Representative Ongoing liaison with government, industry and regulators
COMPLIANCE	<ul style="list-style-type: none"> Policies relevant to modern slavery issues, such as: <ul style="list-style-type: none"> Modern Slavery Policy Sustainability Policy Health & Safety Policy Whistleblower Policy Anti-Bribery & Corruption Policy Gift & Hospitality Policy Modern Slavery Working Group 	<ul style="list-style-type: none"> Annual Compliance Audit Compliance Plan Internal audit Board review of Audit & Risk Committee and Sustainability, Safety and Compliance Committee Board Committee review of Management Committees Modern Slavery Plan Quarterly certificates 	<ul style="list-style-type: none"> Grievance and reporting mechanism <ul style="list-style-type: none"> Group Code of Conduct – Management, Monitoring and Reporting Procedure Ethics Line
PROCUREMENT	<ul style="list-style-type: none"> Dealing with Third Parties Policy Procurement Policy 	<ul style="list-style-type: none"> Supplier registration Supplier screening tool and onboarding Anti-Bribery & Corruption Declaration Template commercial contracts Tender responses to modern slavery questionnaires 	<ul style="list-style-type: none"> Supplier access to grievance and reporting mechanism Ethics Line

PEOPLE	<ul style="list-style-type: none"> • People policies including <ul style="list-style-type: none"> ○ Recruitment Policy, procedures and management systems ○ Workplace Behaviour Policy ○ Anti-Bullying, Harassment and Discrimination Policy ○ Diversity and Social Inclusion Policy ○ Flexible Working Policy ○ Parental Leave Policy ○ Family and Domestic Violence Policy ○ Redundancy Policy 	<ul style="list-style-type: none"> • Human Rights Impact Assessments • People policies audit 	<ul style="list-style-type: none"> • Education and training <ul style="list-style-type: none"> ○ Code of Conduct ○ Compliance ○ Leadership ○ Modern slavery ○ Equal employment opportunity, anti-bullying, harassment and discrimination
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* The Safety, Sustainability & Compliance Committee was established in 2022.

Caption: Key elements of ThieSS' integrated approach to assessing and addressing modern slavery risk.

Governance and leadership

Our governance framework is founded in our Principles of integrity, accountability, innovation and delivery, and underpinned by safety. These Principles guide all of our activities and form the basis of our [Code of Conduct](#), which sets the standard of behaviour we expect from all our employees, sub-contractors and partners.

Where the Code of Conduct or a policy sets higher standards of behaviour than local laws, rules, customs or norms, the higher standards apply.

Our Code of Conduct rejects all forms of modern slavery, including but not limited to the trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage and deceptive recruiting for labour and services. We do not tolerate child labour or any form of exploitation of children or young people and are committed to complying with the International Labour Organisation (ILO) with respect to under-age workers.

While ultimate accountability rests with the ThieSS Board, our governance framework delegates management to Board committees, senior management and management committees, under the leadership of the Chief Executive Officer.

We have a comprehensive series of policies, procedures, frameworks and guidelines relating to corporate governance, ethics, and financial and risk management in place across our operations to provide overall operating parameters for our regions.

Managing risk is a critical element of ThieSS' overall business strategy and has been a key contributor to our success. Our Risk Management Framework is aligned with ISO31000 and is tailored to our business, embedded largely within existing processes and aligned to our short and long-term objectives.

CASE STUDY: Responding to a global pandemic

The COVID-19 pandemic impacted the health, safety, and mental wellbeing of people around the world, including our team members, friends, families and communities. It also escalated the risk of modern slavery.

Throughout the pandemic, we prioritised care for our people and communities and met our client commitments through:

- Supporting our office-based employees to work flexibly and from any location
- Caring for our team with a focus on health, mental wellbeing and team connection
- Leveraging digital technology to enable 174,600 weekly health declarations, perform temperature health checks and conduct virtual safety inspections using wearable technology
- Reviewing and refining our controls and emergency response plans
- Delivering regional community outreach programs to support COVID-19 management
- Deploying comprehensive regional vaccination plans incorporating employees, their families and our host communities
- Supporting our team members and families who experienced the loss of loved ones
- Delivering Employee Assistance Program (EAP) COVID-19 sessions to employees (in all four regional languages) through our EAP providers (Gryphon Psychology and IRIDAT).

Throughout the pandemic, our procurement teams have focused on maintaining existing suppliers and sourcing from locally based manufacturers for new goods wherever possible. We avoided moving to untested supply at international levels, with the knowledge that escalated global demand for certain goods has potential to increase the risk of modern slavery. We placed realistic timeframes on our suppliers when sourcing urgent goods and services during this phase of the pandemic.

Saving lives through vaccination

In Indonesia, Thiess supported our people, the local workforce and community by electing to take part in the government's Gotong Royong vaccination program. More than 20,000 vaccinations were purchased and administered to Thiess employees and subcontractors, and 2,271 family members and members of our host communities were vaccinated as part of this program. As at the end of December 2021, 99 per cent of our Indonesian workforce was fully vaccinated.

Supporting children impacted by COVID-19

In Mongolia, Thiess worked in collaboration with Gobi Youth Development NGO and the local Citizens' Representative Council of Tsogttsetsii Soum to support 200 children during the pandemic, delivering fortnightly care packages to communities surrounding the Umnugovi Ukhaa Mine. Local Citizens' Representative, Bulgantuya Otgontuya, said the packages supported low-income families living and working on the Soum territory along the coal haul road.

Compliance

Our framework for compliance, due diligence and internal audit is set out in our Compliance Plan, which was introduced in 2021. The Compliance Plan framework comprises the policies, procedures and controls we have in place to mitigate the risk of breaches in our compliance obligations, including those set out in our Code of Conduct, Anti-Bribery & Corruption Policy, Dealing with Third Parties Policy, Group Procurement Policy, Health & Safety Policy, Workplace Behaviour Policy and Whistleblower Policy.

In 2021, we implemented a [Modern Slavery Policy](#), setting out our strategy for assessing and addressing the risks of modern slavery. The Modern Slavery Policy, and supporting Modern Slavery Plan, identify the minimum requirements for managing modern slavery risks, including implementation of control systems and reporting and allocation of accountability for actions.

Minimum requirements include:

- Implementation and use of a third-party screening tool, to assist in screening their suppliers and third parties
- Implementation of template contracts and conditions for goods or services procured - all contracts must contain a standard clause with respect to modern slavery
- Employee recruitment and selection practices, in accordance with relevant policies and procedures
- Modern slavery training for relevant roles.

The activities which facilitate modern slavery due diligence across Thiess include:

- The convening of a Modern Slavery Working Group, comprised of functional leads from the people, procurement, legal, compliance, sustainability and communication teams. The Working Group's objectives are to identify modern slavery risks and mitigations for our operations and supply chains, share ideas for continuous improvement and integrate appropriate controls within existing business processes.
- Participation in the CIMIC Modern Slavery Committee meetings, which facilitate the sharing of ideas for continuous improvement.
- The conduct of an annual review assessing our compliance with the use of the third-party screening tool, including reviewing activities addressing modern slavery risk.
- The investigation, evaluation and measurement of the effectiveness and adequacy of Thiess policies and the Code of Conduct, by the Internal Audit Team, who perform an independent assurance function and provide reports to the Board.
- Participation in the CIMIC Group Compliance Working Group - a collaboration of CIMIC operating companies' in-house legal teams, which meets quarterly and drives and tracks modern slavery compliance.

Ethical matters are reviewed by the Reportable Conduct Group², which oversees matters related to ethical standards and practices and compliance with applicable legal and regulatory requirements and internal policies.

Grievance and reporting mechanism

Open communication is key to maintaining our Code of Conduct. We encourage our employees, sub-contractors and partners to voice their concerns should they come across any potentially unethical practices – including any human rights grievances. Our confidential, independent whistleblower hotline, called the "Ethics Line", and our approach to investigating, addressing and remediating breaches, work together to encourage and manage the reporting of any potential unethical practices. This approach is also underpinned by our Code of Conduct, our Code of Conduct - Management, Monitoring & Reporting Procedure, Anti-Bullying, Harassment & Discrimination Policy and Whistleblower Policy.

² The Reportable Conduct Group comprises the Chief Executive Officer, Chief Financial Officer, General Counsel and Company Secretary, and Head of People.

Whistleblowers can remain anonymous and all disclosures, including modern slavery concerns, may be referred to the authorised Business Conduct Representative³ who ensures that any disclosure is investigated appropriately, promptly and confidentially. The Workplace Protection Officer is also responsible for safeguarding the interests of any Whistleblower within the organisation.



Caption: Thiess' grievance and reporting mechanism. For more information go to <https://www.thiess.com/en/about-us/corporate-governance>

RTL

After becoming the majority owner of RTL in 2020, we commenced a process to support RTL's transition to Thiess policies and procedures where appropriate. In 2021, we mapped RTL's policies and procedures to support that transition, which is ongoing in 2022.

Procurement

Our procurement framework provides policy, systems and processes to support supply chain due diligence. Activities include assessing risks in our applicable business sectors and conducting comprehensive auditing and vetting of subcontractors, suppliers and third parties engaged by our businesses.

As part of the framework, the Dealing with Third Parties Policy and Procurement Policy incorporate:

- The management of modern slavery risks into our supplier registration (a business integrity check)
- The screening and onboarding process
- A suite of mandatory template commercial contracts
- A set of requirements for suppliers' management of their suppliers.

This approach is key to Thiess building and maintaining a reliable and trusted supply chain, and proactively identifying and managing modern slavery risks throughout the term of each contract.

Supplier screening and onboarding

Thiess has implemented an internationally recognised due diligence solution to screen third parties for a range of risk factors – including the risk of modern slavery. This solution has been used to evaluate subcontractors, suppliers and business partners, and checks for:

- Sanctions, watch-lists, adverse litigation and Politically-Exposed-People (PEP) lists
- Adverse print and social media, screening for all jurisdictions in which Thiess operates
- Financial information including company ownership, structure, credit rating and financial strength
- Modern slavery risks, bribery and corruption due diligence requirements.

The solution leverages information from the Global Slavery Index (GSI), prepared by the Walk Free Foundation, as well as records of adverse media concerning modern slavery allegations and breaches which are collected from various sources including LexisNexis.

Based on the above multi-factor assessment, each supplier is allocated a risk-rating which may trigger preparation of corrective action plans, or in some cases, exclusion from working with Thiess entities.

As at December 2021, Thiess has risk assessed over 5,427 suppliers in its Third-Party Screening Tool since 2019. In 2021, we continued the review and assessment of historical suppliers and rationalised our supplier database. We have continued to refine workflows and due diligence on new suppliers onboarded by Thiess.

³ The Business Conduct Representative is a senior person within the People or Legal function who supports the operation of the Code of Conduct.

Our Dealing with Third Parties Policy and supplier onboarding process also includes specific modern slavery due diligence requirements. Suppliers are required to comply with applicable laws and our Thiess Code of Conduct, and complete a declaration confirming that no slavery, forced or child labour has been used anywhere by the third party or, to the best of the third party's knowledge, by any direct suppliers to the third party.

The declaration specifically requires suppliers to disclose whether they have:

- Been subject to or received any prosecutions, regulatory notices, tendering restrictions, sanction notices, litigation or arbitration concerning allegations of modern slavery or breaches of human rights by their employees or subcontractors and suppliers
- Been found guilty of a criminal offence which would include modern slavery crimes
- A compliance management program in place to meet business integrity laws and regulations, including those relating to modern slavery.

Suppliers are also required to notify Thiess if they become aware of any behaviours that are in contravention of applicable laws and confirm they will not use any payments received from Thiess in violation of modern slavery laws and regulations.

Template commercial contracts

Our Group Procurement Policy requires the engagement of suppliers using Thiess' suite of template commercial contracts. The suite includes different forms of contract which can be used depending on the scope, site, value and complexity of the works or services to be provided, the risk profile of the relevant project and whether there is a design or installation element. In limited circumstances, Thiess works with our suppliers to agree alternative contract terms.

Our template commercial contracts require suppliers to comply with our Code of Conduct, ensuring alignment with Thiess' expected behaviours.

The template contracts also require suppliers to warrant that they have not been convicted of an offence relating to modern slavery, that they will not breach any modern slavery legislation and that they will comply with any requests from Thiess to comply with all modern slavery legislation. This includes providing information and documents and allowing interviews to be undertaken.

Secondary supplier controls

Given the number of direct suppliers we engage, the number of indirect ('secondary') suppliers involved in our businesses is substantial. As a supply chain becomes more remote, influencing the behaviours and conduct of indirect suppliers presents a greater challenge. By raising awareness, engaging ethical direct suppliers, obliging our supply chain to reject the use of modern slavery, and performing due diligence, we can gradually gain more influence.

We require our direct suppliers ensure their own suppliers meet our modern slavery requirements. Direct suppliers must:

- Ensure their suppliers read, understand and comply with Thiess' Code of Conduct which contains information relating to modern slavery; and
- Allow Thiess to conduct an independent audit of their suppliers to ensure, amongst other things, that they are conducting their business in a proper manner and in accordance with applicable codes of conduct and generally accepted business ethics.

People and employment

Thiess focuses on creating a workplace culture which puts safety first and fosters our Principles of integrity, accountability, innovation and delivery. We invest in our people to build safe, rewarding careers, and prioritise cultivating an inclusive workplace, advancing gender equality, increasing Indigenous employment and the use of Indigenous suppliers, and investing in local employees where we operate.

CASE STUDY: Gender inequality and modern slavery

We recognise that gender inequality increases the risk of modern slavery for women. As part of our Diversity & Inclusion PINTAR (People in Non-Traditional Roles) sub-committee, we introduced a bus warden program in Indonesia to target fatigue, improve travel safety and provide job opportunities for women new to the mining industry. The program has increased our intake of female employees while providing rewarding employment opportunities and career development for women in the region.

Human Rights Impact Assessments (HRIA)

Our ongoing HRIA program prioritises assessments in higher risk sectors and geographies where we have a significant workforce.

Thiess has completed HRIAs in Indonesia (2018) and Mongolia (2020-2021). Due to the continuing effect of COVID-19 on Thiess, the HRIA self-assessment tool developed in 2020 has continued to be used for remote risk assessments.

Thiess HRIAs are based on the Human Rights Compliance Assessment Quick Check prepared by the Danish Institute for Human Rights. Our HRIA tools assess categories including governance and leadership; people management; health and safety; community engagement; security arrangements; country risks; and procurement.

The tools audit compliance with our standard employment contracts and review modern slavery indicators such as: wages and benefits, working hours, employment criteria (such as age), freedom of association, systems and facilities, protective equipment and training, unlawful discrimination and worker accommodation.

Assessment steps include engaging leadership, undertaking risk assessment and due diligence, conducting site visits (subject to travel restrictions), reporting findings and developing action plans.

CASE STUDY: Mongolia HRIA

In 2021, we finalised our HRIA of our Mongolian operations to identify, understand and assess the current state of our operations with respect to the human rights of our workers and community workers.

Our Mongolia HRIA was originally planned as an integrated desktop and in-country review of the operation in 2020. However, the delivery of the review was modified to be a remote review due to the impact of COVID-19 and restrictions on global travel.

A Self-Assessment Plan was used to assist with the delivery of the review, forming the team and defining the interfaces within the Mongolian business. The review team was comprised of members of the global people, legal, safety and procurement teams.

The HRIA helped to identify opportunities for us to improve our business practices.

The HRIA involved engagement with:

- Our workforce, including members of the leadership team, functional teams, direct employees and labour hire workers
- Our client's community team, which provided important insights into local community programs that Thiess contributed to, including challenges for communities sitting directly within the operational area of the mine
- Community representatives
- Selected suppliers, including the delivery of training to suppliers using our standard internal training presentation to expand both parties' understanding of the potential risks in Mongolia for Modern Slavery.

People policies

Our overarching people framework guides operations across our multiple businesses, sectors and geographies, facilitating compliance with, and often exceeding, local laws.

Policies and processes that help to build respectful, safe work environments and to mitigate modern slavery risks include our:

- Recruitment Policy, procedures and management systems with formal approval gates including verification of candidates' identity and their right to legally work
- Health & Safety Policy
- Anti-Bullying, Harassment & Discrimination Policy
- Diversity & Social Inclusion Policy
- Flexible Working Policy
- Parental Leave Policy
- Family & Domestic Violence Policy
- Redundancy Policy.

Our Internal Audit team audits compliance with Thiess policies.

Education and training

Our mission is to provide safe, rewarding and fulfilling careers for our people. On-the-job development is complemented with a range of learning experiences that build skills and technical capabilities. These are underpinned by our Principles and Code of Conduct.

Education and training are integral to our compliance framework and to engaging and upskilling our people in meeting their legal, regulatory and compliance responsibilities. We monitor, report and manage training completion rates through Thiess' centralised learning management system, LAAMP (Learning and Assessment Management Portal), and by using on-site project records.

During the COVID-19 pandemic, the ability of our people to travel to deliver or receive training was significantly impacted. To ensure that our people received the training they needed, we utilised video-conferencing technology to deliver training that would previously have been delivered face-to-face.

Code of Conduct and Compliance Training

Our Code of Conduct training covers Thiess' Principles and Code of Conduct, ethical behaviour and key policies, including: health, safety and environment, unlawful discrimination, anti-bribery and corruption, and anti-bullying and harassment. We require employees to complete Code of Conduct training via e-learning within three months of their commencement, with refresher training completed every two years. We also provide more detailed face-to-face training to employees in roles with potential exposure to key risks.

Additionally, depending on roles, some employees are also required to complete specific compliance training. Topics delivered via e-learning include whistleblower, equal opportunity, unconscious bias, IT security, and anti-bullying, harassment and unlawful discrimination.

Modern slavery Training

Thiess delivers modern slavery training globally to equip our people to recognise and report modern slavery risks. This training is included as part of onboarding for supervisory and managerial staff and is also conducted in face-to-face workshops with managers and employees in procurement and people roles. Communication resources support the training, facilitating greater understanding of the issue and its importance to our business.

LAAMP Modern Slavery records	e-learning		Face-to-face / VC	
	2020	2021	2020	2021
Participants	1500	798	129	2
%	94.5%		92.9%	

Refresher sessions for both online and face-to-face training are required every two years. Following the introduction of modern slavery training in 2020, face-to-face training for high-risk roles will be conducted in 2022 together with Code of Conduct training.

2021 Actions

In 2021, a range of actions were taken to enhance our capabilities to identify, mitigate and prevent modern slavery risks across Thiess' operations and supply chain, and remedy any impacts that occur.

Governance and compliance

- Commenced the transition to Thiess-specific policies and procedures, including Thiess' Code of Conduct, Anti-Bribery and Corruption Policy, Privacy Policy and Whistleblower Policy
- Introduced a stand-alone Modern Slavery Policy and updated our Modern Slavery Plan, setting out the responsibilities and accountabilities for modern slavery risks and controls
- Implemented the Compliance Plan
- Continued consultation with CIMIC as part of the Modern Slavery Committee and the Compliance Working Group.

Operations

Human Rights Impact Assessments (HRIA)

- Finalised the HRIA self-assessment for Mongolia.

Training

- Conducted ongoing modern slavery online and face-to-face training
- Continued to provide Code of Conduct, compliance and leadership training.

Supply chain

- Mapped our supply chain to identify areas of focus for 2022
- Processed approximately 745 new suppliers through the screening tool in 2021. Where identified risk ratings required further investigation and assessment, remedial plans were actioned
- Continued to perform supply chain risk assessments, having regard to commodity, industry, jurisdiction, spend, dependency, length of relationship and reputation.

Assessing effectiveness

Our assessment of effectiveness is evidence based and includes monitoring and analysing compliance audit results, supplier screening and close-out of corrective action plans, training participation, communications engagement, HRIA results, the completion of improvement plans and responsiveness to grievances. Quantitative data and regular qualitative reviews facilitated by our governance framework shape our annual planning process and support our aim for continuous improvement in our response to modern slavery.

Our Modern Slavery Working Group is responsible for implementing and managing the Modern Slavery Plan, promoting adherence to the Modern Slavery Plan and understanding the effectiveness of steps outlined in the Modern Slavery Plan.

In 2022 we have commissioned EY to conduct an audit into our modern slavery processes and reporting to assist us in adapting and strengthening our actions to continually improve our response to modern slavery.

Looking ahead

2022 priorities

In 2022, we will:

Operations

Governance and compliance

- Continue to enhance our understanding and knowledge of modern slavery risks, including the potential risks associated with changes to our business as it adapts to meet its diversification and decarbonisation commitments
- Establish a new Safety, Sustainability & Compliance Board Committee, which will make recommendations to the Board on the progress and effectiveness of Thiess' strategies and policies on human rights (including modern slavery), diversity and social inclusion and approve the Modern Slavery Statement
- Continue to transition RTL to Thiess policies and procedures where appropriate
- Commission an internal audit of our modern slavery processes and reporting.

People and employment

Human Rights Impact Assessments (HRIA)

- Undertake a remote HRIA of our operations in India (noting anticipated ongoing challenges for travel associated with COVID-19)
- Commence planning to complete a HRIA in Indonesia in 2023. The Thiess HRIA schedule has been prepared having regard to the GSI (prevalence index rank, vulnerability to modern slavery and government response rating) and internal assessment of our operations and supply chain.

Training

- Continue to build our people's capability to recognise and report any risk of modern slavery.

Supply chain

Procurement

- Commence on the ground risk assessments of selected high impact suppliers and high-risk suppliers through the process outlined in this statement. We will target at least three suppliers in 2022. Modern Slavery risks will be considered as part of a holistic ESG-based review. It is intended that assessments will initially be supported by third party specialist organisations, with a view to conducting future assessments in-house
- Continue to screen suppliers and business partners through the third-party screening tool and if necessary, develop and implement appropriate remediation measures.

Ongoing engagement and communication

We will continue to engage with Government, industry, regulators and other organisations to build awareness and understanding to combat modern slavery.

Engagement is a key input for our continuous focus on modern slavery risks and developing a trusted supply chain.

We value gaining and sharing insights with relevant organisations including:

- **Government and regulatory bodies** in the different regions in which we operate
- **Modern Slavery Business Engagement Unit** – Our Compliance team monitors the unit's regular updates on the status of the legislation and developments in the area of modern slavery and has attended presentations by representatives from Australian Border Force
- **Industry Associations** – We value and consider guidance, advice and recommendations provided by industry associations in the regions in which we operate to assist with identifying and addressing modern slavery risk in the construction, services and resources sectors. Organisations we liaise with include the Minerals Council of Australia (MCA), including membership of the MCA Modern Slavery Taskforce, Australian Mines and Metals Association, Queensland Resources Council, NSW Minerals Council, Chamber of Minerals and Energy of WA and the Resource Industry Network
- **External forums** – Members of our people and compliance teams participate in external forums to improve their awareness of modern slavery risks and to embed learnings within the business.

Appendix A

Thiess Reporting Entities

Company	ACN	Registered Address
Thiess Group Holdings Pty Ltd	646 054 757	179 Grey St, South Bank, QLD, 4101
Thiess Group Finance Pty Ltd	646 055 629	179 Grey St, South Bank, QLD, 4101
Thiess Mongolia Holdings Pty Ltd	645 403 532	179 Grey St, South Bank, QLD, 4101
Thiess MidCo Holdings Pty Ltd	645 168 672	179 Grey St, South Bank, QLD, 4101
Thiess Pty Ltd	010 221 486	179 Grey St, South Bank, QLD, 4101
FleetCo Holdings Pty Limited	165 304 361	179 Grey St, South Bank, QLD, 4101
FleetCo Rentals Pty Ltd	165 304 432	179 Grey St, South Bank, QLD, 4101
RTL Mining and Earthworks Pty Ltd	152 855 135	Eastern Road, Yallourn, VIC, 3825

Modern Slavery Act Mandatory Criteria

The table below identifies where in this statement we have addressed each of the mandatory criteria required by the *Modern Slavery Act 2018* (Cth):

No	Mandatory Criteria	Page number
1	Identify the reporting entity	3, 19
2	Describe the structure, operations and supply chains of the reporting entity	6
3	Describe the risks of modern slavery in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	8
4	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	10, 17
5	Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	17
6	Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	3
7	Include any other information that the reporting entity, or the entity giving the statement, considers relevant	18

ENDS



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