

# **Modern Slavery Policy**

## **Overview**

This policy outlines Thiess' commitment to assess and address risks associated with modern slavery in accordance with the *Group Code of Conduct* (the Code). It also sets out Thiess' reporting obligations under the *Modern Slavery Act 2018* (Cth).

This Policy applies to all employees of Thiess, third parties engaged by Thiess, and all alliances and joint ventures in all jurisdictions.

This Policy should be read in conjunction with the <u>Code and the Group Code of Conduct - Management</u>, <u>Monitoring</u> <u>and Reporting Procedure</u>.

# Policy

#### Modern Slavery

Under the Australian *Modern Slavery Act 2018* (Cth), modern slavery is defined to include eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting for labour and services.

Modern slavery is only used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. However, these practices may also be illegal and harmful and may be present in some situations of modern slavery. These practices may also escalate into modern slavery if not addressed.

Thiess is committed to managing all aspects of its operations and supply chains to assess and address risks of modern slavery.

#### **Minimum Requirements**

Managing the risks of modern slavery within Thiess relies on the following factors:

- promotion of and adherence to a culture of integrity and compliance with the Code;
- the adoption of appropriate processes and procedures to assess and address modern slavery within Thiess;
- employee recruitment procedures;
- due diligence of Thiess' supply chains;
- on-going training and awareness;
- carrying out periodic risk assessments; and
- internal control systems.

This Policy is reviewed in accordance with the Group Governance Policy.

#### Accountability

All staff are responsible for reading, understanding and complying with this Policy.

All Managers are individually accountable for managing modern slavery risk.

The Thiess Board is responsible for the review and approval of the annual modern slavery statement to be submitted by Thiess in accordance with the *Modern Slavery Act 2018* (Cth).

#### Maintaining internal control systems

Thiess is responsible for implementing, maintaining and continuously improving an internal control system for assessing and addressing risks of modern slavery.

#### Reporting process

All incidences of potential or suspected modern slavery or concerns must be reported using Thiess' Incident Management System as set out in the <u>Group Code of Conduct - Management</u>, <u>Monitoring and Reporting</u> <u>Procedure</u>.

### **Policy Information**

Owner:	Thiess General Counsel and Company Secretary
Approved by:	Thiess Chief Executive Officer
Effective date:	15 December 2021

Note: THIESS Group policies may be amended from time to time.