







## Key Actions Taken in 2020

In 2020, we have continued developing our understanding of our own operations and the operations of our suppliers and developed new or amended policies and procedures including:

- Reviewing the 2019 Statement in consultation with the Finance, People and Culture, Legal and Project Team representatives
- Finalising redevelopment of our Modern Slavery Statement and policies to comply with the *Modern Slavery Act 2018* (Australia)
- Redevelopment of the contracts with our engineering design and drafting partners in India to incorporate Modern Slavery requirements
- Amended sub-consultancy agreements to incorporate Modern Slavery requirements
- Development of a separate Modern Slavery Policy supporting this statement
- Commenced provision of general Modern Slavery awareness training to help our staff recognise indicators of the existence of Modern Slavery in our supply chain and our own behaviours
- Introduction of Modern Slavery safeguards into our Procurement Policy and Procedures
- Development of Supplier Modern Slavery Self-Assessment Questionnaire and Internal Modern Slavery Self-Assessment Questionnaire

## Key Actions Planned for 2021

In 2021, we will continue developing our understanding of our own operations and the operations of our suppliers through:

- Building Awareness
  - Complete roll out of Modern Slavery awareness training to all members of the global RBG team
  - Continue to develop and improve the existing modern slavery training
  - Develop and commence roll-out of targeted training as the need is identified
- Improving Policies and Procedures
  - Continue improving our policies and procedures to incorporate modern slavery content as appropriate
- Complete internal risk assessments within our operations in all regions of operation
- Enhancing Due Diligence
  - Continue the due diligence of all our existing suppliers in our identified key supplier risk areas (including cleaning services, garment (uniforms and PPE), electronics and professional & technical services) as well as new high risk areas that may be identified during our regional modern slavery assessment activities

# Robert Bird Group Structure, Operations and Supply Chain

## About Us

Established in 1982, Robert Bird Group is a global consulting engineering firm with approximately 700 staff across 10 offices. Our relentless pursuit of engineering excellence is underpinned by focusing on our client's needs and delivering their vision.

## Structure and Location

Robert Bird Group is a member of the Surbana Jurong Group and is wholly owned by Surbana Jurong Holdings (Australia) Pty Ltd. We have 4 Australian offices including Brisbane, Sydney, Melbourne, and Adelaide and we have 1 office in Dubai. We have 5 wholly owned subsidiary companies with offices in London, New York, Wellington, Auckland, Kuala Lumpur and Hong Kong.

Refer to Appendix 2 for more detail about our structure and locations.

## Operations

We offer consulting engineering services across 5 disciplines, drawing upon our international expertise including:

- structural engineering
- civil engineering
- construction engineering
- geotechnical engineering (UK & MENA)
- virtual design & construction (VDC)

The scope of services includes:

- general engineering advice
- design and documentation (concept to construction documentation)
- site inspections and supervision
- construction methodology design and advice
- peer reviews
- design verification

## Policy and Governance

The Robert Bird Group Board is responsible for all sustainability issues including ensuring the management of human rights risks, including Modern Slavery. With respect to Modern Slavery, the Robert Bird Group Board is responsible for:

- oversight of Robert Bird Group's Modern Slavery commitments
- regular review of the Modern Slavery Policy to ensure it continues to evolve and reflect community expectations
- ensuring Robert Bird Group has an effective system to ensure compliance with the policy

The Director, Commercial & Legal is responsible for the implementation of our human rights policies and:

- annually updating the Modern Slavery Policy and related procedures
- receiving notification of possible breaches of the policy, investigating, and enforcing policy compliance
- monitoring the policy's use and effectiveness
- ensuring that an appropriate communication and training strategy for this policy is implemented and reviewed to assess effectiveness

The day to day implementation and coordination of human rights related activities is the responsibility of the regional General Managers, Division Managers, and the People and Culture team.

In 2018 Robert Bird Group established a Compliance Working Group of senior executives to drive continual improvements in corporate policy and governance, working towards best practice in all areas of our operations. This working group was expanded in 2019 and now reports to the Board through the Group Risk and Compliance Committee. The Compliance Working Group includes representatives from Legal, Finance, Operations and Project teams.

Included in the remit of the Compliance Working Group are:

- Code of Conduct  
Establishes the standards with which Robert Bird Group Pty Ltd and all its employees will act in the conduct of all business and working relationships
- Business Integrity Policy & Procedure  
Establishes the standards of behaviour that are expected of all RBG employees in the performance of their duties to ensure that all necessary steps are taken such that RBG and its employees do not engage, nor be involved, in any form of bribery, corruption or fraudulent behaviour
- Safety, Environmental and Social Responsibility Policy  
Sets out our commitment to safety and well-being of our employees and other stakeholders, environment, and sustainability, social responsibility, and duty of care

- Modern Slavery Policy
- Procurement Policy

Sets out our approach to procurement and includes zero tolerance to the existence of Modern Slavery in our supply chain.

## Supply Chain

Robert Bird Group has a diverse supply chain including professional services firms acting as subconsultants and suppliers of services, equipment and consumables to our offices, and which are used in the provision of our Services and amenity to our employees.

Robert Bird Group recognises that our suppliers play an important role in fulfilling our human rights commitments. We therefore require individuals or organisations who do business with Robert Bird Group to implement and comply with the human rights customs and practices that we ourselves uphold. This is achieved through our supplier contract agreements and supplier pre-qualification processes. We will further require our suppliers to place the same requirements on their first level suppliers.

Identified typical areas of supplier related risk include cleaning services, garments (uniforms and PPE), electronics (office equipment), and professional engineering and technical services.

Refer to Appendix 3 for more information about our supply chain.

## Reporting of Suspected Breaches

Robert Bird Group encourages anyone who suspects that a breach of our commitments has occurred, either by Robert Bird Group or by a supplier to us, to report the breach or suspected breach by emailing the details to the Robert Bird Group CEO [Jason.Beutel@robertbird.com](mailto:Jason.Beutel@robertbird.com). This includes any breach of the *Universal Declaration of Human Rights* (UDHR) and/or the *Modern Slavery Act 2015* (UK) and/or the *Modern Slavery Act 2018* (Australia). Alternatively, reports can be made anonymously by following the Robert Bird Group Whistleblower procedure which is available on our website [www.robertbird.com](http://www.robertbird.com).

The details of suspected breaches will be investigated by the Director - Commercial & Legal.

## Risk Assessment and Management

The following activities apply to and are coordinated across all Robert Bird Group regions and offices including wholly owned entities. Internal reviews of our operations are planned to occur concurrently across our regions annually to allow completion of whole of group assessment and reporting.

Assessments of new suppliers in identified risk areas will be performed as required and prior to engagement and then annually.

## Risk Identification

Modern Slavery has the potential to exist within our operations and supply chains through a range of circumstances. These include forced labour, child labour, debt bondage, and human trafficking.

We have enhanced and where necessary established new policies and procedures to meet our Modern Slavery obligations and its elimination within our own operations. This is supported by our HRM policies and procedures, training of our staff and annual reviews in each region of operations using our self-assessment toolkits.

Training is considered critically to build awareness of modern slavery and it is mandatory for all employees. This training is online and covers all key areas to build awareness and knowledge in modern slavery.

The larger Modern Slavery risk for our operations lies with our suppliers. The key areas of supplier related risk include but are not limited to:

- Cleaning Services

Cleaning services carry a higher Modern Slavery risk (including in first world countries) due to the use of low-skilled, low-paid, manual work, and the high ratio of seasonal and migrant workers and subcontractors. Without appropriate contractual arrangements and due diligence on our behalf, there is a risk that we could be linked to or even contribute to Modern Slavery practices in the cleaning service industry.

- Garments (uniforms and PPE)

Robert Bird Group is involved to a small degree in the purchase of garments. These include arranging for the purchase of non-compulsory branded shirts and the direct purchase of PPE (personal protection clothes and equipment). These items are often produced in countries with much higher risks of Modern Slavery due to less stringent local government due diligence and over-sight processes. Purchasing goods manufactured in these countries could support companies involved in Modern Slavery practices or linked to such. The ability to investigate beyond the level of our immediate supplier is often difficult due to the highly complex nature of the supply chain.

- Electronics

The use of forced labour is prevalent in the manufacture of electronics (computers, laptops, mobile phones) in some countries and the electronics industry is acknowledged as a high-risk industry globally. Like the garment industry, manufacture often occurs in countries with less stringent government due diligence and over-sight processes. There is also the risk that raw materials used in the manufacture of the electronics components has been sourced for countries where the miners have been the victims of Modern Slavery practices. By not applying due diligence in the selection of the products we purchase, we could be contributing to or be linked to Modern Slavery practices.

- Professional Engineering and Technical Services

Robert Bird Group utilises the services of selected professional engineering and technical services companies some of which are in countries that are identified in the *Global Slavery Index 2018* as having significant vulnerability to Modern Slavery practices. If we do not manage and monitor these suppliers through contractual requirements and audit, we could be contributing to or be linked to Modern Slavery practices.



The Robert Bird Group management in each region is required to do their own assessment using the supplied toolkits to identify any local risks and report these back to the Compliance Working Group.

As additional Modern Slavery risks are identified through the regional assessments, they will be addressed based on risk level.

## Risk Assessment

Robert Bird Group commits to performing assessments to identify the risks of Modern Slavery practices in our operations in new regions and with new additions to our supply chain.

For our suppliers, we have developed a Modern Slavery Supplier Self-Assessment form which is required to be completed by our suppliers on initial engagement and updated annually. This may also be backed up by review of published Modern Slavery statements of the suppliers. In our contractual agreements with our suppliers (where possible) we reserve the right to audit the supplier's compliance.

## Due Diligence

Robert Bird Group commits to reviewing the risks of modern slavery practices in our existing operations and existing supply chain at least annually including reviews of the supplier contracts and updates of the Supplier Pre-Qualification Questionnaires. The reviews will include re-assessment of the control measures effectiveness as well as compliance with our commitments. The reviews will address all Robert Bird Group offices and members of our Tier 1 supply chain. When necessary and contractually possible compliance audits may be performed on the suppliers.

## Action / Remediation

In the event of an actual breach being identified, Robert Bird Group is committed to developing and implementing suitable remedial action to address the breach and eliminate or at very least minimise the risk of recurrence.

Possible actions available include:

- Internal Robert Bird Group operations
  - Develop mitigation to prevent the impact
  - Cease the activity
  - Enhance or develop new policies and procedures
- Supply Chain (involves collaboration)
  - Supplier to cease the activity
  - Supplier to develop mitigation to prevent the impact
  - Robert Bird Group changes Supplier

## Measurement

Robert Bird Group is committed to reviewing the effectiveness of any remedial actions in a timely manner and where necessary, developing additional actions. These reviews will include re-assessment of the control measures effectiveness and may require follow up audits and/or further procedural changes.

## Training

Robert Bird Group is committed to providing regular training to our employees through on-line and face to face sessions about our commitments towards and the risks of Modern Slavery including:

- Fulfilling the commitments identified in this Statement
- Identifying, assessing, and addressing the risks of Modern Slavery that they may encounter in their operations including sector and industry risks, product and services risks, geographical risks, entity risks
- Indicators of Modern Slavery.

Training will be provided to all employees and will be a required element of the induction process for all new employees of Robert Bird Group. Additional training will be provided, as necessary. Training will be updated regularly as required.

## References

- *Universal Declaration of Human Rights (UDHR)*.
- *Modern Slavery Act 2015 (UK)*.
- *Modern Slavery Act 2018 (Australia)*.
- *2016 List of Goods Produced by Child or Forced Labour - US Department of Labor*
- *Global Slavery Index – 2018*
- *Modern Slavery: Risks, Rights and Responsibilities – KPMG, February 2019*

## Appendix 1 – Modern Slavery Act 2018 (Australia) Statement Index

MSA Clause: Part 2 – Modern Slavery Statements	Title: Page Number
Section 16 (1) (a) - identify the reporting entity	Scope: Page 2 Appendix 2: Page 12
Section 16 (1) (b) - describe the structure, operations, and supply chains of the reporting entity	Structure and Location: Page 5 Appendix 2: Page 12 Operations: Page 5 Supply Chain: Page 7 Appendix 3: Page 13
Section 16 (1) (c) - describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls;	Risk Assessment and Management: Page 7 Risk Identification: Page 8
Section 16 (1) (d) - describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Risk Assessment and Management: Page 7 Action / Remediation: Page 9
Section 16 (1) (e) - describe how the reporting entity assesses the effectiveness of such actions	Measurement: Page 10
Section 16 (1) (f) - describe the process of consultation with:	Risk Assessment and Management: Page 7
(i) any entities that the reporting entity owns or controls	
(ii) in the case of a reporting entity covered by a statement under section 14—the entity giving the statement	Board of Directors Approval Scope: Page 2
Section 16 (1) (g) - include any other information that the reporting entity, or the entity giving the statement, considers relevant	Statement: Page 3 Commitments: Page 3 Key actions taken 2020: Page 4

## Appendix 2 - Robert Bird Group Structure and Locations

Entities	Name	Office Location	Registered Address	Employees (Approx.)
<b>Reporting Entity</b> (Private Company)	Robert Bird Group Pty Ltd ACN - 010 580 248	Brisbane, Australia	C/- BDO Level 10, 12 Creek Street Brisbane QLD 4000	360
		Sydney, Australia		
		Melbourne, Australia		
		Adelaide, Australia		
		Dubai, United Arab Emirates		80
<b>Owned Entities</b> (100% owned by Reporting Entity)	Robert Bird & Partners Limited (UK)	London, UK	First Floor, Harling House 47-51 Great Suffolk Street London SE1 0BS United Kingdom	200
	Robert Bird Group (New Zealand) Ltd	Wellington, New Zealand	C/- BDO Wellington Limited Level 1, 50 Customer house Quay Wellington 6143 New Zealand	30
		Auckland, New Zealand		
	Robert Bird Group Hong Kong Ltd	Hong Kong	Room 709-710, Tower 1, Silvercord 30 Canton Road Tsim Sha Sui, Kowloon Hong Kong	10
	Robert Bird Group (USA) Inc	New York, USA	C/ The Corporation Trust Company Corporation Trust Centre 1209 Orange Street, Wilmington New Castle County, Delaware USA 19801	10
Robert Bird Group (Malaysia) Sdn Bhd	Kuala Lumpur, Malaysia	Suite 1005, 10 <sup>th</sup> Floor Wisma Hamzah Kwong Hing 1 Leboh Ampang 50100 Kuala Lumpur Malaysia	10	
<b>Parent Company</b> (Private Company)	Surbana Jurong Holdings (Australia) Pty Ltd ACN 612 229 (Part of the Surbana Jurong Group, Singapore)	Sydney, Australia	197, Level 5, 20 Berry Street, North Sydney, NSW 2060	N/A

## Appendix 3 – Supply Chain Information

Service / Product	Supplier Locations	Governance Method	Renewal / Review Period
Engineering and Drafting Services	India	Terms of Contract	Annual
	Poland	Terms of Contract	Annual
	Local to Office	Prequalification Questionnaire and Approved Supplier Lists	Annual
IT and General Office Equipment	Local to Office	Prequalification Questionnaire and Approved Supplier Lists	Annual or Term of Lease
Office Supplies	Local to Office	Prequalification Questionnaire and Approved Supplier Lists	Annual
Cleaning Services	Local to Office	Prequalification Questionnaire	Annual