

Robert Bird Group Modern Slavery Statement (FY2021)



Table of Contents

- Board of Directors Approval2
 - Statement Period.....2
 - Scope.....2
 - Feedback.....2
- Statement.....3
 - Commitments3
 - Key Actions Taken in 20214
- Robert Bird Group Structure, Operations and Supply Chain5
 - About Us.....5
 - Structure and Location.....5
 - Operations.....5
 - Policy and Governance.....5
 - Supply Chain.....7
- Reporting of Suspected Breaches7
- Risk Assessment and Management8
 - Risk Identification8
 - Risk Assessment.....9
 - Due Diligence.....9
 - Action / Remediation.....9
 - Measurement.....9
- Training.....10
- References.....10
- Appendix 1 – Modern Slavery Act 2018 (Australia) Statement Index11
- Appendix 2 - Robert Bird Group Structure and Locations12
- Appendix 3 – Supply Chain Information.....14

Board of Directors Approval

Statement Period

This statement describes the steps taken by Robert Bird Group Pty Ltd and its subsidiaries (Robert Bird Group) for the 2021 fiscal year (FY21) to prevent modern slavery and human trafficking in our businesses and supply chains.

Our 2021 fiscal year began on the 1st of January 2021 and finished on the 31st of December 2021.

This is our fourth Modern Slavery Statement under the Modern Slavery Act 2015 (UK) and our second Modern Slavery Statement under the Modern Slavery Act 2018 (Australia).

Scope

This statement covers all Robert Bird Group and its subsidiaries, including:

- Robert Bird & Partners Limited (UK)
- Robert Bird Group Hong Kong Ltd
- Robert Bird Group (New Zealand) Ltd
- Robert Bird Group (USA) Inc
- Robert Bird Group (Malaysia) Sdn Bhd

Feedback

Robert Bird Group values feedback. Please send any feedback on this statement or requests for additional information to compliance@robertbird.com.

This statement was approved by the board of Robert Bird Group on 29th June 2022.



Jason Beutel
Chief Executive Officer
Robert Bird Group

Statement

Robert Bird Group is committed to social and environmental responsibility. As part of this commitment, Robert Bird Group opposes all forms of slavery in our operations and the operations of our suppliers.

Robert Bird Group are committed to upholding the human rights of all those who work for us, with us, or partner with us, and will comply with international conventions regarding human rights and the provisions within the *Modern Slavery Act 2015* (UK) and *Modern Slavery Act 2018* (Australia).

RBG has a global reach with offices across the world and we implement and maintain zero tolerance towards any breach of the *Universal Declaration of Human Rights* (UDHR) and/or the *Modern Slavery Act 2015* (UK) and the *Modern Slavery Act 2018* (Australia).

Commitments

RBG is committed to:

- Creating a safe, inclusive, discrimination free and bias free working environment
- Implementing and upholding the principles defined by the UDHR and compliance with the 1998 *International Labour Organisation Declaration on Fundamental Principles and Rights at Work* and the *Modern Slavery Act 2015* (UK) and the *Modern Slavery Act 2018* (Australia)
- Compliance with local labour laws, customs, and practices in the jurisdictions in which we operate, including protection of the rights of all local and migrant workers
- Complying with minimum wage and age requirements in the jurisdictions in which we operate
- Adhering to statutory frameworks and regulations regarding working hours and conditions
- Providing a platform for employees and staff to raise and resolve issues in a collaborative and supportive environment
- Fostering and encouraging a culture in which employees take an active and participatory role in making the workplace environment a supportive and welcoming place for all
- Providing a secure working environment with adequate welfare amenities and facilities
- Regular review of our systems and procedures to confirm their continued relevance and effectiveness

RBG will never knowingly:

- Exploit or permit any person to be exploited
- Permit or tolerate any exploitation under or in connection with our name
- Do business with individuals or organisations that do not implement and comply with the human rights customs and practices that we ourselves uphold
- Influence an employee's decision to exercise their rights to become a member of, or participate in, any union, staff support organisation or professional body

Key Actions Taken in 2021

In 2021, 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:

- During the previous reporting period, we rolled out a compulsory online modern slavery module to all employees. During the current reporting period, we continued to roll out the training to all new employees as part of their mandatory onboarding process.
- Reviewed 2020 Statement in consultation with the Finance, People and Culture, Legal and Project Team representatives.
- Improvements to Contractual Terms, Modern Slavery Policy, Procurement Policy and Purchasing Procedure addressing Modern Slavery confirmed by the RBG Board and published.
- Amended sub-consultancy master services agreement templates to incorporate Modern Slavery requirements
- Issued Supplier Modern Slavery Self-Assessment Questionnaire and Internal Modern Slavery Self-Assessment Questionnaire to RBG stakeholders for review and feedback prior to implementation.

Key Actions Planned for 2022

In 2022, we will continue developing our understanding of our own operations and the operations of our suppliers through:

- Building Awareness
 - A key aspect to ensuring that our employees can identify, report and help prevent modern slavery is by building awareness through training.
 - During the reporting period, RBG developed a bespoke training module to advance our employees' understanding of modern slavery. The training better represents how modern slavery may arise within our operations or supply chain. It uses examples more representative of the services we provide and builds upon what red flags to look out for when identifying possible modern slavery.
 - The finalised module will be rolled out as mandatory training during the next reporting period.
- Improving Policies and Procedures
 - Continue improving our policies and procedures to incorporate modern slavery content as appropriate with a particular focus on guidance for investigations as a result of reports through our grievance mechanism
- Complete internal risk assessments within our operations in all regions of operation
- Enhancing Due Diligence
 - Continue the risk-based due diligence of suppliers identified as higher risk suppliers such as cleaning services, garments (uniforms and PPE) and electronics and professional & technical services.
 - Review, amend and/or add to our identified key supplier risk areas as required.
 - Enhance and expand our supplier prequalification program.

Robert Bird Group Structure, Operations and Supply Chain

About Us

Established in 1982, Robert Bird Group is a global consulting engineering firm with approximately 650 staff across 11 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, Birmingham, New York, Wellington, Auckland, 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.

During the reporting period, we have also identified risk of modern slavery be present in:

- Outsourcing administrative functions.
 - We outsource some of our administrative services to an overseas office located in the Philippines. Whilst this entity is a related company and employees are subject to the same policies and RBG employees, given the nature of the work force and risk attributed to the geographical location of the offices (as noted in the *Global Slavery Index 2018*), more targeted information is required surrounding recruit firms used.
- Marketing and merchandise
 - During the 2020 and 2021 reporting periods, in particular due to COVID-19 restrictions, there was no expenditure in relation to RBG branded merchandise. However, we recognise that the procurement of branded merchandise presents possible modern slavery risks depending on the original source of the merchandise.

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. 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.

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

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.

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

We are updating the investigation process related to our grievance mechanism. It will set out how we will investigate and, where applicable, remediate grievances and allegations relating to human rights abuses or modern slavery within our operations or supply chain. The procedure will be based on recommendations by national and international guidance (UN Guiding Principles and Global Compact's Implementing Effective Modern Slavery Grievance Mechanisms)

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

Training is considered critical to build awareness of modern slavery and it is mandatory for all employees. During the reporting period we looked to our employees to provide feedback on (1) the mandatory training module that was rolled out in the last reporting period and (2) general awareness of modern slavery.

Overwhelmingly, feedback in relation to the online training was positive with employees having a better understanding of what modern slavery is and how it might occur. It was acknowledged that training could be improved so employees better understand the risks presented to RBG and how to make a report. We have utilised these comments and, as noted above, updated our training module which will be rolled out in the next reporting period.

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 12/13
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 14
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 8 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 8/9 Action / Remediation: Page 9
Section 16 (1) (e) - describe how the reporting entity assesses the effectiveness of such actions	Measurement: Page 9
Section 16 (1) (f) - describe the process of consultation with:	Risk Assessment and Management: Page 8
(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 2021: Page 4

Appendix 2 - Robert Bird Group Structure and Locations

Entities	Name	Office Location	Registered Address	Employees (Approx.)
Reporting Entity (Private Company)	Robert Bird Group Pty Ltd ACN - 010 580 248	Brisbane, Australia	Level 1 480 St Pauls Terrace Fortitude Valley QLD 4006	320
		Sydney, Australia		
		Melbourne, Australia		
		Adelaide, Australia		
		Dubai, United Arab Emirates		60
Owned Entities (100% owned by Reporting Entity)	Robert Bird & Partners Limited (UK)	London, UK Birmingham, 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	35
		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	No current office	Suite 1005, 10 th Floor Wisma Hamzah Kwong Hing 1 Leboh Ampang 50100 Kuala Lumpur Malaysia	0

Other Entities Entities in which RBG has an investment, but does not control	Robert Bird Group Engineers P.C. Idaho, USA License P-18812	No current office	1460 Broadway, Floor 12 New York, NY 10036 USA	0
Parent Company (Private Company)	Surbana Jurong Holdings (Australia) Pty Ltd ACN 612 229 (Part of the Surbana Jurong Group, Singapore)	Sydney, Australia	Level 5, 20 Berry Street, North Sydney, NSW 2060	Surbana Jurong Holdings (Australia) Pty Ltd ACN 612 229 (Part of the Surbana Jurong Group, Singapore)

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