

Joint Modern Slavery Statement

This is the joint modern slavery statement of SMEC Holdings Pty Ltd, Robert Bird Group Pty Ltd, and Atelier Ten Ltd and their respective subsidiaries for the financial year ending 31 December 2024.

This Statement is made in accordance with the requirements of the Modern Slavery Act 2018 (Australia) and the Modern Slavery Act 2015 (UK).

Atelier Ten is providing this disclosure voluntarily, as it does not currently meet the mandatory reporting threshold under the applicable legislation.

This Statement is currently under consideration for publication by the Attorney-General's Department.

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Reporting Entity

This is the joint modern slavery statement (Statement) of SMEC Holdings Pty Ltd ("SMEC"), Robert Bird Group Pty Ltd ("RBG"), and Atelier Ten Ltd ("Atelier Ten") and their respective subsidiaries for the financial year ending 31 December 2024.

This Statement is made in accordance with the requirements of the Modern Slavery Act 2018 (Australia) and the Modern Slavery Act 2015 (UK).

Atelier Ten is providing this disclosure voluntarily, as it does not currently meet the mandatory reporting threshold under the applicable legislation.

Approval

This statement was approved by the boards of SMEC, Atelier Ten and RBG on 10, June 2025.



Hari Poologasundram
SMEC Holdings Pty Ltd



David Seel
Robert Bird Group Pty Ltd

About Us

We are part of the SJ Group, a global consulting firm specializing in urban, infrastructure, and management service, with over 70 years of experience in delivering successful projects. Our global team of 6,700 professionals operates from more than 129 offices across over 41 countries. This includes architects, designers, planners, engineers, facilities managers, and other specialists who are driven by progressive thinking and creative ideas to shape a better tomorrow.

At SMEC, RBG, and Atelier Ten, we operate primarily within the engineering, consulting, and professional services sectors. While we do not directly employ workers in construction or labour-heavy roles, we recognise that modern slavery risks can still be present in our supply chains. Our operations depend on a wide network of suppliers, contractors, and service providers that help deliver successful outcomes in the projects we execute.

Our Supply Chain

Our supply chain is integral to the successful delivery of our projects across various sectors. We engage suppliers and contractors across two main categories:

Project-Based Services: This includes consultants, contractors, and subcontractors who provide specialized services directly supporting the execution of our projects. These services cover the design, planning, construction supervision, and commissioning phases, as well as specialized technical services. We also source the necessary equipment and materials to support the delivery of these project-based services.

Operational Support Services: These services support our day-to-day business operations and include:

- Office space rental and facility management
- Office equipment and ICT infrastructure
- Health, safety, and environmental services
- Travel, accommodation, and logistics services
- Professional services, including legal, HR, and consultancy
- Procurement of personal protective equipment (PPE) in line with health and safety standards

Risk of Modern Slavery in our Operations and Supply Chain

Although we operate primarily within the engineering, consulting, and professional sectors, we acknowledge that modern slavery risks exist within our supply chains. These risks are particularly relevant in areas indirectly connected to our business, such as construction and materials procurement.

We have identified the following key areas where modern slavery risks may be present:



Project-Based Services: In large-scale infrastructure projects, particularly in regions where labour rights concerns have been widely reported we may be present on construction sites in supervisory roles or working alongside construction contractor personnel. While we do not directly employ or manage site labour, there remains a risk of indirect exposure to modern slavery practices, including forced labour and unsafe working conditions.



Material Procurement Risk: The procurement of materials for infrastructure projects often involves complex, multi-tiered supply chains spanning regions with varying labour standards. Many suppliers may operate in areas where forced labour, child labour, and other exploitative practices are more prevalent. While construction contractors and our clients typically manage the sourcing and purchasing of materials, our role in validating material specifications means we can be indirectly exposed to these risks. We have limited visibility or control over upstream sourcing practices, which increases the potential for modern slavery risks within the materials used in our projects.



Operational Support Services: In addition to project-specific services, we rely on operational support services to maintain our day-to-day functions. Certain categories of operational support services carry modern slavery risks, such as:

- **Cleaning and Maintenance Services:** These services are often reliant on low-wage labour, which may come from vulnerable groups, increasing the risk of exploitation if workers' rights are not adequately protected.
- **Procurement of Office Equipment and ICT Infrastructure:** Global supply chains for office equipment and technology may involve regions with weaker labour protections, where forced labour or child labour risks are more pronounced.



High-Risk Jurisdictions: Our operations span a global footprint that includes regions with higher risks of modern slavery. These risks are often associated with weak labour protections, low enforcement of laws, and political instability. Key high-risk regions include:

- **Asia-Pacific, Central Asia, and Sub-Saharan Africa:** These regions are more vulnerable to modern slavery, especially in sectors like construction and material procurement. While we do not directly employ workers in these sectors, we recognize the increased risk of exploitation in the supply chains of project participants.
- **Conflict-Affected Areas:** Suppliers or contractors in areas affected by conflict or political instability may face a higher risk of modern slavery, including forced labour and exploitation linked to criminal or militant groups.



Recruitment Practices: Modern slavery risks are also present in recruitment practices, particularly where labour is sourced through third-party brokers or agencies. Some of the risks associated with these practices include:

- **Labour Brokers and Recruitment Agencies:** Third-party agencies or labour brokers may engage in exploitative practices, such as charging workers excessive fees or providing substandard working conditions.
- **Migrant Labour:** Migrant workers are particularly vulnerable to exploitation, including debt bondage or coercion, when they are subjected to high recruitment fees or other forms of exploitation.

Our Commitment to Addressing Modern Slavery Risks

At SMEC, RBG, and Atelier Ten, we are committed to identifying, assessing, and addressing modern slavery risks across our operations and supply chains. We believe that responsible sourcing and labour practices are integral to our business and are committed to working closely with our suppliers, contractors, and partners to ensure that modern slavery is not tolerated.

Our commitment is reflected through:

Leadership Engagement

Our senior leadership spanning from Chief Executive, Legal, Procurement, Health and Safety, People and Culture, and Operations has engaged in focused discussions to build a unified understanding of our responsibilities under the UK and Australian Modern Slavery Acts.

These sessions have resulted in the following key initiatives:

- Development of a group-wide Modern Slavery Policy to support consistent practice across jurisdictions.
- The creation of country-level risk registers to assess and address modern slavery risks within specific regions and sectors.
- Integration of modern slavery risk management into broader operational and compliance frameworks.

Due Diligence Framework

We are committed to continuously refining our due diligence processes to identify and mitigate modern slavery risks across our supply chain, which includes:

Risk-Based Screening

Employing a risk-based screen of our suppliers using a screening tool to evaluate our supply chain risk profiles, focusing on adverse reports relating to:



Discrimination/ Workforce Rights Issues

Covers reports of discrimination against workers, clients, prospects or other entities. It includes workforce rights issues, child labour, forced labour and discrimination. It also covers alleged discriminatory practices that represent a business/reputational risk.



Human Rights Issues

Covers reports related to human rights issues such as genocide, rape, torture or war crimes. It also includes allegations of complicity in the commission of human rights abuses.



Workforce Disputes

Covers reported strikes, stoppages, disputes over collective bargaining agreements, or disputes over representation on supervisory boards.



Workplace Health/ Safety Issues

Covers reported issues, such as litigation, relating to death, injury, illness of employees (a single employee or more than one). It also includes reports of accidents that have just taken place, for example fires.

Supplier Questionnaire

By the end of 2025, we plan to launch a more comprehensive supplier questionnaire. This questionnaire will be sent to **medium and high-risk suppliers** to assess compliance with labour practices and identify forced labour, child labour, and human trafficking risks.

Contractual Modern Slavery Clauses

We understand that contractual agreements with suppliers and partners are key to ensuring that modern slavery risks are actively managed and mitigated. We are actively assessing and updating our contracts to ensure that modern slavery clauses are included in new or renewed contract with high-risk suppliers and in high-risk jurisdiction. These clauses set clear expectations for suppliers and partners regarding the prohibition of modern slavery practices.

Monitoring and Continuous Improvement

To ensure our actions are effective, we continuously monitor our progress and make necessary improvements in our modern slavery risk management framework.

Key Actions in Monitoring and Improvement:

- **Regular Supplier Assessments:** We conduct ongoing risk assessments to monitor the potential for modern slavery in our supply chains. These assessments help us identify emerging risks and allow us to proactively address any issues.
- **Feedback Loops and Supplier Support:** We establish feedback loops with our suppliers to ensure that any identified issues are addressed promptly. We also provide resources and support to help suppliers improve their practices where necessary.
- **Review of Due Diligence Processes:** We continually assess and refine our due diligence processes to keep up with evolving risks and regulatory requirements. This ensures that our approach remains relevant and effective in addressing modern slavery risks.

Reporting

We are committed to transparency in reporting and are taking steps to ensure that modern slavery risks and incidents are identified, reported, and addressed in a timely manner. We maintain a transparent approach to communicating our actions and progress.

Our **SpeakUP SJ** whistleblowing platform provides a confidential reporting channel for modern slavery concerns. Employees, suppliers, and third parties are encouraged to report any suspicions or incidents of modern slavery via this secure platform. We are also enhancing visibility by rolling out another awareness campaign in our offices by the end of 2025.

Training and Awareness

We have rolled out mandatory training for employees to ensure they are equipped to identify and address modern slavery risks. The mandatory training includes:

- Education on modern slavery types (e.g., forced labour, child labour, trafficking).
- Awareness of risk indicators in operations and supply chains.
- Guidance on company policies and reporting mechanisms.
- Practical tools to prevent and respond to modern slavery.

Measuring Effectiveness

We track the impact of our actions through defined performance indicators:

- Percentage of suppliers assessed for modern slavery risk.
- Completion rates of employee training.
- Number of modern slavery incidents reported and resolved
- Regular review of our policies and procedures.

Our Path Forward

For the next reporting period, we aim to:

- Finalise and implement our Modern Slavery Policy across all jurisdictions.
- Complete the rollout of risk registers in priority countries.
- Enhance our due diligence process

Our goal is to transition from reactive risk identification to a mature proactive approach, driven by informed leadership, measurable controls, and a commitment to zero tolerance towards modern slavery.



Appendix A

This is a joint statement made on behalf of the reporting entities:

Surbana Jurong (Holdings) Australia Pty Ltd.

SMEC Holdings Pty Ltd.

SMEC Australia Pty Ltd;

SMEC International Pty Ltd

RBG Group Pty Ltd.

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 Engineers (USA) P.C.

Robert Bird Group (Malaysia) Sdn Bhd

Atelier Ten Ltd (United Kingdom)

Atelier Ten International Limited
(United Kingdom)

Atelier Ten (Scotland) Limited (United Kingdom)

Atelier Ten London Ltd (United Kingdom)

Atelier Ten (Asia) Pte.Ltd.(Singapore)



Owned or controlled entities

Surbana Jurong Holdings (Australia) Pty Ltd owns and controls: SMEC Holdings Pty Ltd and Robert Bird Group Pty Ltd.

SMEC Holdings Pty Ltd owns or controls:
SMEC Australia Pty Ltd, SMEC International Pty Ltd, SMEC Services Pty Ltd, and SMEC Foundation Ltd.

SMEC Australia Pty Ltd owns or controls: Global Maintenance Consulting Pty Ltd. and SMEC New Zealand Ltd.

SMEC International Pty Ltd

Controls:

In North & Southeast Asia: ECCL Singapore Pte. Ltd., SMEC Asia Ltd., SMEC International (Malaysia) Sdn. Bhd., SMEC (Malaysia) Sdn Bhd, SMEC Macau Engineering Consultancy Limited, SMEC Myanmar Company Limited, SMEC Philippines Inc, SMEC PNG Ltd, SMEC Vietnam JSC, and Global Maintenance Consulting Singapore Pte. Ltd.

In Africa: SMEC International (Africa) Pty Ltd, SMEC (Kenya) Limited, SMEC Nigeria Limited, SMEC South Africa Pty Ltd, SMEC (Tanzania) Limited, SMEC Uganda Limited, Soillab Pty Ltd, VKE Namibia Consulting Engineers Pty Ltd, VKE Botswana Pty Ltd, and Vincpro Properties (Pty) Ltd

In South Asia Central Asia: ACE Consultants Ltd, SMEC Oil & Gas (Pvt) Ltd, Engineering General Consultants (EGC) Ltd, SMEC Rail India Pvt Ltd, Ocyana Consultants Pvt Ltd, SMEC Central Asia LLP, SMEC Georgia LLC, SMEC Tashkent LLC, SMEC India PVT Ltd, SMEC Rail India Pvt Ltd, SMEC (Bangladesh) Limited, SMEC Pakistan Ltd and South Asia Middle East Management Company LLC.

In the Americas: SMEC Servicios de Ingenieria de Mexico, and SMEC Chile Limitada

Other: Frontier Energy Ltd and Frontier Hydro Limited

Has investments in, but does not control:

PT SMEC Denka Indonesia, Himalayan Green Energy Private Limited, LDLC Properties (Pty Ltd), Soilco Materials Investigations (Proprietary) Limited, VKE Infrastructure Services (Pty) Limited, and TT Energy Private Ltd

Surbana Jurong Consultants Pte. Ltd. (Singapore) owns and controls:
Atelier Ten Ltd (United Kingdom),

Atelier Ten Ltd (United Kingdom) owns and controls:
Atelier Ten International Limited(United Kingdom), Atelier Ten(Scotland) Limited(United Kingdom), Atelier Ten London Ltd(United Kingdom),Atelier Ten (Asia) Pte.Ltd.(Singapore)

Appendix B

Mandatory Criteria	Page
Identify the reporting entity	1
Describe the structure, operations, and supply chains of the reporting entity	1
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	2
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.	3 -4
Describe how the reporting entity assesses the effectiveness of such actions	4-5
Describe the process of consultation on the development of the statement	3-4
Other information that the reporting entity considers relevant	5





 **asmec**

 Robert **Bird** Group

 **atelier** ten