



smec

Robert Bird Group

atelier ten

Modern Slavery Statement

1 January 2025 to 31 December 2025



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1. Reporting entity

- 1.1 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 2025. In this Statement, "we", "us", and "our" refer to these entities collectively.
- 1.2 This Statement has been prepared in consultation with the reporting entities mentioned in **Appendix A** to ensure a consistent and coordinated approach to identifying and addressing modern slavery risks across our operations and supply chains.
- 1.3 This Statement is made in accordance with the requirements of the ModernSlavery Act 2018 (Australia) and the Modern Slavery Act 2015 (UK).
- 1.4 This statement has been approved by the Boards of **SMEC, Atelier Ten** and **RBG**.
- 1.5 **Authorisation**
This Statement has been approved and is signed by the undersigned, each being duly authorised to sign on behalf of the relevant reporting entities.

James Phillis

Chief Executive

SJ Group Infrastructure and Energy

David Seel

Chief Operating Officer

SJ Group Buildings and Cities



2. About us

- 2.1 We are part of the **SJ Group**, a global consulting firm specialising in urban, infrastructure, and management service, with over 70 years of experience in delivering successful projects. Our global team of 16,000 professionals operates from more than 120 offices across over 40 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.

70+ Years
16 000
professionals
120 offices
40+ countries

SJ Group delivers integrated solutions across a broad range of sectors, including transportation, infrastructure, environment, buildings, energy, water, and defence. We work with both public and private sector clients, combining technical expertise with strong programme and project management capabilities. Our teams of advisors, engineers, environmental specialists, architects, and planners collaborate to deliver complex projects and sustainable outcomes.

- 2.2 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.

3. Our Commitment

Our Modern Slavery Policy explicitly prohibits all forms of modern slavery, including forced labour, child labour, human trafficking, and any form of exploitation or abuse. We are committed to ensuring that we do not knowingly engage with suppliers, business partners, or other third parties involved in such practices.

Our Modern Slavery Policy is available at <https://www.sjgroup.com/responsibility/>.

4. Our supply chain

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

- a) **Project-Based Services:** This includes consultants, contractors, and subcontractors who provide specialised services to support the delivery of our projects. These services span the full project lifecycle, including the design, planning, construction supervision, and commissioning phases, as well as other technical and advisory services. This may also include the sourcing of equipment, materials and other resources through our supply chain to support project delivery, which may expose us to modern slavery risks.
- b) **Operational Support Services:** These services support our day-to-day business operations and include:
 - Office space rental and facility management including cleaning services
 - 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

These activities involve the engagement of suppliers and service providers, which may present potential modern slavery risks within our supply chain.

5. Risk Assessment of Modern Slavery in Our Operations and Supply Chain

5.1 Overview of Risk Environment

We are committed to providing a working environment in which all individuals are treated fairly, with dignity and respect, and are free from harassment, discrimination, bullying, racism, and violence.

While our core activities are within the engineering, consulting, and professional sectors, which are typically considered lower risk due to the skilled nature of the work force, we acknowledge that modern slavery risks may still exist within our broader operation and supply chains.

Our project delivery model involves collaboration with a range of external stakeholders within our broader ecosystem, including construction contractors, and material suppliers. While these parties play a critical role in project execution, they are typically engaged and managed by clients or principal contractors, and therefore operate outside our direct control. As a result, we may have limited visibility over their practices, creating potential for indirect exposure to modern slavery risks.

5.2 Approach to Risk Assessment

Given the nature of our business as provider of professional consultancy services across engineering, environmental, and related disciplines, our operations generally present a lower inherent risk of modern slavery due to the qualifications and professional standards required of our workforce.

Our risk assessment focuses on areas where exposure is more likely, including:

- **Geographic risk**, particularly in countries where modern slavery is more prevalent
- **Industry and sector risk**, especially within construction and manufacturing supply chains
- **Service category risk**, including activities involving low-skilled or potentially vulnerable labour

We utilise international benchmarks, alongside internal assessments to identify higher-risk jurisdictions and activities across our operations and supply chain.

5.3 Key Risk Areas Identified

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



a) **Project-Based Services:** In large-scale infrastructure projects, particularly in regions where labour rights concerns have been widely reported, our personnel 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, exploitative working conditions and unsafe working conditions.



b) **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 contractors and 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.



c) **Operational Support Services:** We rely on operational support services to maintain our day-to-day operations. Certain categories within these services may present elevated modern slavery risk, particularly where low-skilled, low wage, or outsourced labour is involved. Key areas include:

- **Cleaning and Facility Management 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.



d) **High-Risk Jurisdictions:** Our operations span across a global footprint that includes regions where the risk of modern slavery may be elevated. These risks are often associated with weak labour protections, low enforcement of laws, and political or economic 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 recognise 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, human trafficking and exploitation linked to criminal or militant groups.



- e) **Recruitment Practices:** Modern slavery risks may also arise in recruitment practices, particularly where labour is sourced through third-party providers. 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, misrepresenting employment terms or failing to provide adequate working conditions.
 - **Migrant Labour:** Migrant workers are particularly vulnerable to exploitation, including debt bondage, restriction of movement or coercion, when they are subjected to high recruitment fees or other forms of exploitation.

6. How We Address Modern Slavery Risks

- 6.1 We have implemented a range of measures to identify, assess, and mitigate modern slavery risks across our operations and supply chains. These measures form part of our broader risk management and compliance framework

a) Groupwide policy

In 2025, SJ Group introduced a Group wide Modern Slavery Policy, which prohibits all forms of modern slavery, including forced labour, child labour, and human trafficking

b) Risk Based Due Diligence and Supplier Management

We apply a risk-based approach to due diligence and supplier management across our supply chain. Suppliers and business partners are assessed prior to engagement and periodically thereafter based on key risk factors, including geographic location, nature of services, sector exposure, and other relevant risk indicators.

This process includes the use of third-party screening tools to identify potential exposure to modern slavery risks and monitor for adverse information relating to:



Labour and workforce rights issues
(including forced labour and child labour)



Human rights violations



Workforce disputes



Workplace health and safety incidents

Where higher risks are identified, suppliers are subject to enhanced due diligence, including further review by the Compliance team. This assessment considers both the supplier's risk profile and the nature of the goods or services provided.

All business partners are expected to comply with SJ Group's Modern Slavery Policy or equivalent standards when conducting business with or on behalf of SJ Group.



c) High-Risk Jurisdictions and Projects

We apply additional controls where operations, suppliers, or projects involve higher-risk jurisdictions. Opportunities involving high-risk countries are subject to enhanced due diligence and internal approval processes. Reviews consider modern slavery risk as part of broader business and operational risk assessments. Appropriate mitigation measures are required to be implemented where elevated risks are identified

d) Contractual Modern Slavery Clauses

We recognise that contractual agreements with suppliers and business partners are key mechanism for ensuring that modern slavery risks are actively managed and mitigated. We continue to assess and update our contracts to ensure that modern slavery clauses are included in new or renewed contracts, particularly with higher-risk suppliers and in high-risk jurisdiction. These clauses set clear expectations for suppliers and business partners regarding the prohibition of modern slavery practices.

7. Continuous Improvement

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

7.1 Review of Due Diligence Processes

We continuously 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.

7.2 Compliance Monitoring and Testing

As part of our compliance monitoring and testing activities, we have initiated targeted reviews, including site visits to construction locations. These activities support the identification and assessment of potential modern slavery risks within project environments. We continue to enhance these targeted review processes to strengthen oversight and improve our ability to detect, assess, and address modern slavery risks in practice.

8. Reporting

8.1 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.

8.2 Our **SpeakUP SJ** whistleblowing platform provides a confidential reporting channel for modern slavery concerns and supports our zero-tolerance approach to retaliation against individual who raises a concern. Employees, suppliers, and third parties are encouraged to report any suspicions or incidents of modern slavery via this secure platform.

To support awareness and accessibility, we are continuing to promote the use of SpeakUP SJ through ongoing awareness initiatives.

9. Training and Awareness

- 9.1 An updated **mandatory training** has been rolled out to all employees to ensure they are equipped to identify and address modern slavery risks.
- 9.2 The mandatory interactive and scenario-based training includes:
- a) Understanding modern slavery: Education on the different forms of modern slavery (e.g., forced labour, child labour, trafficking).
 - b) Risk Awareness: Identification of modern slavery risk indicators across operations and supply chains.
 - c) Policy and reporting: Guidance on company policies and reporting mechanisms.
 - d) Practical responses: Tools and guidance to prevent, identify and respond to modern slavery in practice.

10. Measuring Effectiveness

- 10.1 We assess the effectiveness of our approach to managing modern slavery risks using a range of key performance indicators, including:
- a) Percentage of suppliers assessed and screened for modern slavery risk through the due diligence process.
 - b) Completion rates of employee training.
 - c) Number of modern slavery incidents reported and resolved

11. Engagement

We recognise the importance of stakeholder engagement in addressing modern slavery risks and advancing responsible business practices. SMEC is a participant in the United Nations Global Compact (UNGC) and aligns its approach with the Ten Principles of the UNGC, including those relating to human rights and labour.

SMEC report annually through the Communication on Progress (CoP), outlining our actions to prevent and address modern slavery risks within our operations and supply chain, and our contribution to the UN Sustainable Development Goals (SDGs) relevant to human rights.

Through our participation in UNGC initiatives and engagement with industry peers, we continue to strengthen our approach to identifying, managing, and mitigating modern slavery risks.



12. Our Path Forward

12.1 For the next reporting period, we aim to:

- a) Implement our SJ Code of Conduct across all jurisdictions.
- b) Complete the rollout of risk registers in priority countries.
- c) Automate our due diligence process to facilitate faster risk identification, assessment and mitigation.

12.2 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 Australia
(Branch Office United Kingdom) 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	Section
Identify the reporting entity	1
Describe the structure, operations, and supply chains of the reporting entity	2 & 4
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	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.	5
Describe how the reporting entity assesses the effectiveness of such actions	9
Describe the process of consultation with : • any entities that the reporting entity owns or controls; • and in the case of a reporting entity covered by a statement—the entity giving the statement; and	1
Other information that the reporting entity considers relevant	6



asmec

 **Robert Bird Group**

 **atelier ten**