

## Modern Slavery and Human Trafficking

This Policy aims to ensure that all personnel, contractors, suppliers, clients, and employees understand the Company's expectations and zero-tolerance of Modern Slavery and Human Trafficking at Kramer Ausenco.

Kramer Ausenco Group is committed to ethical social and community responsibility and to the fair and humane treatment of people in its employment and in its supply chains. Kramer Ausenco's declarations of the company's Values and Culture support this developing policy with respect to zero tolerance of Modern Slavery and Human Trafficking.

Modern slavery can take many forms; it is a complex and multi-faceted problem. The **Modern Slavery Act 2015** covers four key criminal activities:

- **Slavery** - where ownership is exercised over an individual.
- **Servitude** - involves the obligation to provide service imposed by coercion.
- **Forced and compulsory labour** - all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty; and
- **Human trafficking** - involves arranging or facilitating the travel of another with a view to exploiting them.

Other forms of modern slavery, which will not be tolerated but are not specifically referenced, include, but are not limited to:

- **Child labour** - whilst not always illegal in the jurisdiction in which it takes place, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development.

All forms of modern slavery have in common, the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights. Tackling modern slavery requires all Kramer Ausenco employees to play a part and remain vigilant to the risks in all aspects of the Kramer Ausenco business and business relationships.

It is our belief that modern slavery and human trafficking are abhorrent practices that will not be tolerated in our own operations or in our supply chains, and we will take such steps that are reasonable to ensure that none is present. We are committed to working ethically and with integrity and we require our business partners to do the same.

Kramer Ausenco is an international project management, engineering, and architecture professional services business. Kramer Ausenco's business operations and supply chain consists primarily of office-based professionals, with limited exposure to areas with a greater risk of modern slavery. Most organisations with which we engage are demonstrably focussed on supporting and complying with Modern Slavery and Human Trafficking policies and laws. Our supply chains are very limited in scope and to date we are satisfied that our supply chains do not engage with higher risk elements.

### Expected Use and Behaviour

At all times Kramer Ausenco personnel, contractors, and employees must be aware and mindful of Kramer Ausenco expectations and standards in relation to Modern Slavery and Human Trafficking.

### Assessment & Management

We assess the risks on an ongoing basis, both external and internal, of slavery and human trafficking, including country risks, sector risks and business partnership risks within our own operations and in our supply chain.

Where we identify higher risk areas in our supply chains, appropriate due diligence will be undertaken to satisfy ourselves that the parties concerned have in place ethical employment practices that comply with all relevant legislation including, where applicable, the making of an Anti-Slavery statement pursuant to the **Modern Slavery Act 2015**. Where suppliers have not published an Anti-Slavery Statement, they are required to confirm that they have in place such ethical employment practices and that they, in turn, require their suppliers to have the same.

Kramer Ausenco operates across several country jurisdictions in the South Pacific region. We acknowledge the possibility of concerns in the region within which we operate. The risk areas are typically not Kramer Ausenco customers or suppliers to our supply chains. We comply with and seek the cooperation of the clients and customers with whom we work to likewise be vigilant and engage with us in implementing policies supportive of the legal requirements in each jurisdiction in which we operate. We investigate the concern by reference to available information and resources such as [Maps | Global Slavery Index](#).

### Application & Responsibility

As an integral part of meeting the objectives of this policy, each Country Manager shall be responsible for implementing this policy in each of our respective jurisdictions and ensuring that relevant employees receive adequate training and support applicable to their role.

The Executive Management Unit (EMU) will ensure the provision of standards and required expertise and support to achieve our goals in this policy.

The Chief Executive Officer is accountable to the Board of Directors for the implementation of Kramer Ausenco's Modern Slavery and Human Trafficking policy.

All Kramer Ausenco employees are responsible for their use and application of this Policy.



**Frank Kramer**  
Chief Executive Officer

