

GANDEN is committed to identifying and eradicating Modern Slavery from our supply chains, which has the potential to exist within:

- GANDEN operations where we employ professionals, technically skilled individuals and support personnel
- Subconsultants and subcontractors who support the professional services we provide, including:
 - Other professional services, including geotechnical, electrical and environmental engineering, survey and existing services locating.
 - Goods and services that support our office-based environment, including hardware and software, office equipment, marketing collateral, catering and cleaning services.
 - Goods and services that support site-based work, including testing equipment, PPE, pipework and fittings (for commissioning works).

The term modern slavery is used to denote practices defined in the Modern Slavery Act 2018 (Cth) (MS Act) and includes eight types of serious exploitation: servitude, slavery, forced labour, forced marriage, the worst forms of child labour, debt bondage, deceptive recruiting for labour or services and trafficking. It is generally understood that various geographical locations are more vulnerable to modern slavery abuse. [The Global Slavery](#) Index reports on at-risk Countries that must be considered when undertaking a due-diligence assessment on our supply chains.

Prequalified Supplier Index

Where possible, it is GANDEN's policy for all employees to ensure that all purchasing, including engagement of professional services, is undertaken in line with GANDEN's latest purchasing procedures listed on the GANDEN Staff Intranet.

It is GANDEN's **policy** to engage suppliers listed within the Prequalified Supplier Index, which have been previously assessed for potential Modern Slavery risks within their operations and supply chain.

Where it is a requirement to engage a supplier not listed within the Prequalified Supplier Index, the following activities must be undertaken by management:

1. Due-diligence assessment of modern slavery abuse within GANDEN's own supply chain, as well as external professional services suppliers' operations and supply chains (with emphasis on high-risk geographical locations).
2. Development of training and awareness for staff regarding modern slavery requirements, and
3. Review supplier contracts to ensure that they contain terms consistent with the Modern Slavery Act 2018.
4. Take steps to address all potential modern slavery risks identified.

Responsibilities

GANDEN understand that the presence of Modern Slavery within our supply chain can only be eradicated by implementing policies and processes to reduce the overall risk.

Managers are responsible for:

- Ensuring that the Prequalified Supplier Index is continuously updated, with an assessment on risks associated with modern slavery within their operations
- Implementation of awareness and training for staff around modern slavery
- Ensuring purchasing, expenses, travel and accommodation and office supply procedures are up to date, and comply with the Modern Slavery Act 2018 (Cth) requirements
- Communicating and implementing policies and procedures effectively
- Taking all necessary steps to address any potential modern slavery risks identified, and
- Establishing measures within the QEH&S Targets and Objectives register.

All GANDEN employees are responsible for following the latest Procurement Instructions listed on our project management system - CODA:

- All **purchasing** is undertaken using this procedure
- Be aware of the definitions of *Modern Slavery* as stated within the Australian Government's [Modern Slavery Act 2018](#)

This policy is communicated to all personnel, is available from our website and displayed in our corporate offices.



Geraldine Nutt
Chief Executive Officer - GANDEN Pty Ltd