

Grievance Reporting and Resolution Policy (Modern Slavery & Ethical Conduct)

1. Purpose:

Robson Civil Projects is committed to upholding the highest standards of ethical conduct, human rights, and sustainability across our operations and supply chain.

This **Grievance Reporting and Resolution Policy** provides a structured and confidential process for employees, suppliers, subcontractors, and other stakeholders to report concerns specifically related to:

- **Modern slavery and human rights violations**
- **Environmental and sustainability breaches**
- **Unethical or unlawful conduct within our operations or supply chain**

This policy is separate from internal **Human Resources grievance procedures**, which are designed to manage employment-related matters such as workplace behaviour, entitlements, or performance issues. **HR-related concerns should be directed through internal HR channels.**

Concerns related to **modern slavery or other ethical risks**—particularly those involving vulnerable workers, forced labour, or supply chain misconduct—will be handled in accordance with this policy, ensuring appropriate confidentiality, protection, and remedial action where required.

2. Scope:

This policy applies to:

- All Robson Civil Projects employees and contractors
- Suppliers and subcontractors
- External stakeholders who may be affected by our operations

Concerns covered under this policy include:

- Modern slavery, forced labour, or human trafficking
- Workplace exploitation or unsafe working conditions
- Environmental non-compliance or unethical practices
- Any other violations of human rights or sustainability commitments

3. Reporting Channels:

Robson Civil Projects provides multiple, confidential reporting avenues:

- **Email:** Dedicated reporting inbox modernslavery@robsoncivil.com.au
- **Phone Hotline:** 02 4343 6100 (Available during business hours)
- **In-Person:** Reporting through People & Culture, Modern Slavery Compliance Officer or designated site representatives.

All reports can be made anonymously if preferred.

4. Confidentiality and Non-Retaliation:

- Reports will be handled with strict confidentiality.
- No individual will face retaliation, discrimination, or adverse consequences for making a report in good faith.
- Anonymous reports will be reviewed and investigated with the same level of diligence.

5. Investigation and Resolution Process:

Upon receiving a report, the following steps will be taken:

1. **Acknowledgment** – The grievance will be acknowledged within five business days where possible.
2. **Assessment** – A preliminary review will determine the nature and severity of the issue.
3. **Investigation** – A designated team (including P&C, ESG, Modern Slavery Compliance Officer, and legal representatives as required) will conduct a confidential investigation.
4. **Corrective Action** – If a violation is confirmed, appropriate actions will be taken, including remediation, supplier engagement, or legal compliance measures.
5. **Feedback & Closure** – Where applicable, the reporting party will be informed of the outcome (while maintaining confidentiality).

6. Monitoring and Continuous Improvement:

- All grievances will be recorded, monitored, and reviewed regularly to identify trends and areas for improvement.
- Findings will be reported to senior leadership and incorporated into our risk management and sustainability strategies.
- This policy will be reviewed regularly to ensure its effectiveness.

7. Contact Information:

For further information or to report a concern, please contact:
Modern Slavery Compliance Officer 02 4343 6100



GRANT ROBSON
Managing Director
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