

Modern Slavery Policy

This policy outlines Robson Civil Projects' approach to managing modern slavery risks in compliance with the Modern Slavery Act 2018 (Cth). It details the measures we take to prevent modern slavery, human trafficking, and broader forms of exploitation within our operations and supply chain.

This policy applies to all employees, suppliers, contractors, and subcontractors engaged with Robson Civil Projects. It extends to all areas of our business, including supply chain partners.

Robson Civil Projects is committed to eliminating modern slavery, forced labour, child labour, servitude, and human trafficking from our business activities. We recognise our responsibility to prevent all forms of human rights exploitation and uphold ethical practices throughout our operations.

Responsibilities

- **Board of Directors & Senior Management:** Will provide oversight and ensure that resources are allocated to implement this Policy effectively.
- **Employees:** Are required to adhere to this Policy and report any concerns related to modern slavery risks.
- **Suppliers and Subcontractors:** Are required to comply with Robson's modern slavery standards and provide traceability of products and services.

To minimise the risk of modern slavery, Robson Civil Projects will:

- Ensure that all employees are engaged under fair and lawful work arrangements, provided in a format and language that is clearly understood.
- Maintain policies and procedures, including a Code of Conduct and Diversity and Inclusion Policy that incorporates modern slavery provisions.
- Integrate modern slavery considerations into supplier agreements, ensuring our suppliers and subcontractors operate under ethical labour practices.
- Engage with suppliers who can or are working towards demonstrating traceability and transparency in their operations and supply chains. For those unable to meet these standards, we will work collaboratively to improve their practices or reconsider the relationship.

Actions

This will be accomplished through:

- Communicate modern slavery standards during the employee induction process and through ongoing training.
- Ensure that agreements with service providers, suppliers, and subcontractors explicitly include modern slavery provisions.
- Foster relationships with suppliers that provide clear visibility into their supply chains to prevent exploitation.
- Strengthen due diligence processes for suppliers and subcontractors to ensure alignment with modern slavery obligations, including contract reviews and prequalification assessments.
- Monitor and assess broader social exploitation risks within our business and supply chains.

Monitoring and Reporting

Key business stakeholders are responsible for:

- Reviewing any reported modern slavery incidents.
- Monitoring industry-specific risks related to modern slavery.
- Assessing potential process improvements to better manage and mitigate modern slavery risks.
- Reviewing findings and recommendations from internal, or external audits related to modern slavery.

Compliance and Enforcement

This Policy is enforced through our management system, which aligns with our quality, environmental, and safety objectives. Compliance with this Policy is mandatory, and violations may result in disciplinary action, up to and including termination of contracts or employment.

Communication

The requirements of this Policy will be communicated to all personnel during induction and through ongoing training sessions. This Policy will also be accessible via the company intranet and website.

Approval and Review

This Policy has been approved by the Robson Civil Projects Board of Directors and will be reviewed regularly to ensure ongoing compliance with the Modern Slavery Act 2018 (Cth) and to address any new risks or challenges.



GRANT ROBSON
Managing Director
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