

SUEZ Australia

Modern Slavery

Position Statement

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Level 4, 3 Rider Boulevard

RHODES NSW 2138

AUSTRALIA

T: +61 2 8759 7900

www.suez.com.au



Modern Slavery Position Statement

Slavery, servitude, forced labour and human trafficking (Modern Slavery) are together a world-wide and growing issue, especially given the rapid rise in global migration. As a water and waste management and recycling business in Australia, we recognise the need to adopt a robust approach to slavery and human trafficking.

This position statement sets out SUEZ's actions to identify and address the risks of modern slavery practices in SUEZ's operations and supply chains. SUEZ is committed to conducting business responsibly and to maintaining and improving systems and processes to reduce the risk of slavery or human trafficking in our business and supply chain.

SUEZ will publish a Modern Slavery Statement by 30 June 2021 in compliance with the requirements of the Modern Slavery Act 2018.

Verification of Supply Chain and assessment of risk

Due to our large operating footprint across Australia and the nature of our activities, SUEZ works with a diverse range of stakeholders and partners, from small to large organisations. We are committed to keeping our supply chains safe by assessing and minimising potential Modern Slavery risks that may occur. SUEZ is approaching this task in a strategic manner with some of the key activities including:

- Development of a risk-based approach to Modern Slavery due diligence focusing initially on our tier 1 suppliers, with this list comprising over 600 suppliers or service providers based on their potential risk. A questionnaire has been circulated to these suppliers which relates to their processes for identifying modern slavery risks and for managing the risks if they arise. Responses to the questionnaire are being reviewed and risk assessed.
- Development of annual ongoing risk evaluation and audit plan including tiers 1, 2 & 3 of the SUEZ supply chain.

Compliance with laws

SUEZ's standard terms with suppliers include clauses requiring compliance with all relevant laws, and with SUEZ's ethics policies. Suppliers are required to contractually confirm the prohibition of child labour and any other form of forced or compulsory labour in accordance with the International Labour Organization's labour standards, and that they will employ personnel strictly in compliance with all relevant laws and regulations.

SUEZ standard terms of purchase are available on its supplier portal together with SUEZ's ethics policies, including the Ethics in Supplier Relations Policy. SUEZ's standard procurement contracts have also been updated with Modern Slavery clauses, requiring compliance by suppliers with modern slavery laws.

Relevant Policies and Procedures

All SUEZ employees, including those who have interactions with suppliers are expected to review and comply with company policies, including the following:

- Ethics Charter
- Ethics in Supplier Relations – this policy requires compliance with all relevant laws, and explicitly prohibits human rights abuses such as child labour, forced labour and other illegal labour. It expects suppliers to promote the standards of the International Labour Organisation
- Whistleblowing Policy
- Whistleblowing Policy User Guide
- Employee Assistance Program – this provides an external and confidential support service by telephone through which advice and information are imparted to employees across a wide range of topics. This service also includes face-to-face counselling.

SUEZ has been developing a specific Anti-Slavery Policy and a Supplier Code of Conduct which are consistent with the requirements of the Modern Slavery Act 2018. These should be rolled out during Q1 2021.

We continue to review our policies, systems and processes in order to ensure best practice with respect to ongoing compliance with the Modern Slavery Act 2018.

Training of relevant employees

SUEZ provides relevant employees training in its ethics policies. Employees are expected to review and comply with SUEZ company policies, including the Ethics Charter and Ethics in Supplier Relations Policy.

SUEZ has engaged Anti-Slavery Australia, a specialist organisation, to deliver training on the modern slavery laws to SUEZ staff in early 2021. This training will promote awareness of the Modern Slavery problem, and will provide guidance on what to do if employees spot any signs of it.

Reporting concerns

We expect and encourage our employees to report any concerns regarding breaches of law, regulations or company policy using one of the reporting channels we offer. These include reporting to local management, Human Resources or the Ethics Officer. Our company Whistleblower Policy and Whistleblowing User Guide set out the process for employees and others to make confidential reports without fear of retaliation, which is not tolerated by SUEZ. The company's Employee Assistance Program is also promoted to staff as a support program for advice and assistance when needed.