

Modern Slavery Statement

For the year ended
30 June 2021



SGH | Industrial Services, Media,
Energy and Investments



Introduction

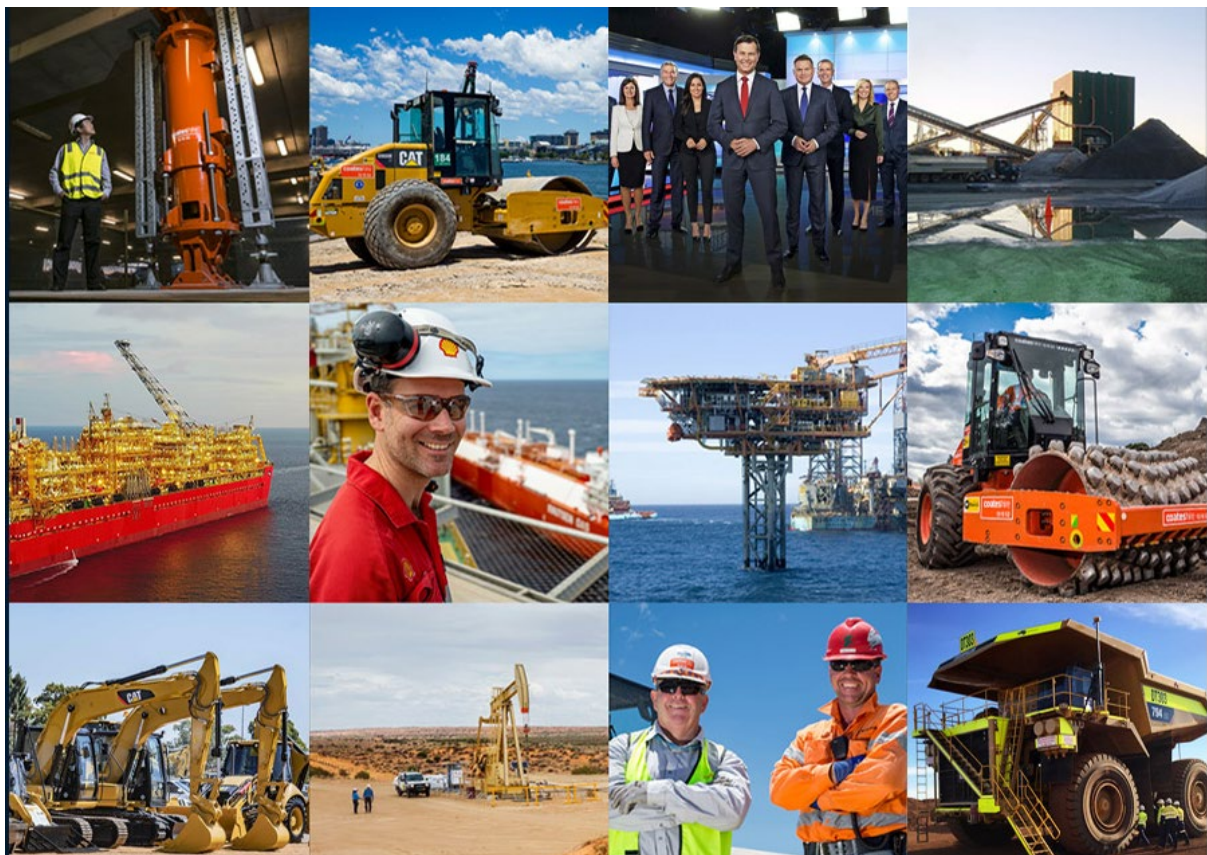
Seven Group Holdings Limited (SGH) is a leading Australian diversified operating and investment group with market leading businesses and investments in industrial services, building products and construction materials, media and energy. SGH's purpose is to recognise and serve exceptional businesses with an objective of maximising returns to stakeholders through long-term sustainable value creation. SGH and its controlled entities (the Group) employs in excess of 5,800 people.

The Group is committed to operating our businesses lawfully and ethically in respect of human rights and opposes all forms of Modern Slavery. The Group acknowledges that Modern Slavery is a serious issue throughout the world and can occur in many forms. With an extensive supply chain, the Group recognises that our procurement activities have social and environmental impacts and is committed to working with suppliers to understand and minimise impacts from our business operations.

This Joint SGH Modern Slavery Statement 2021 (Statement) is made on behalf of Seven Group Holdings Limited and its wholly owned subsidiaries that are reporting entities in accordance with the requirements of the Australian Commonwealth Modern Slavery Act 2018 (Cth) (Modern Slavery Act) for the financial year ended 30 June 2021 (FY21). This is the Group's second Statement under the Modern Slavery Act.

This Statement sets out the steps taken to review and prevent modern slavery in our businesses and supply chains during FY21, with actions taken underpinning our commitment to uphold our values. SGH will continue to develop and enhance its framework for evaluating the risk of modern slavery within its operations to address any areas of concern.




This Statement has been approved for submission by the SGH Board of Directors (Board) and is made pursuant to the Modern Slavery Act.



Reporting Entity

The reporting entity is Seven Group Holdings Limited (ABN 46 142 003 469) whose registered office is Level 30, 175 Liverpool Street, Sydney NSW 2000. SGH was formed in 2010 and is listed on the Australian Securities Exchange (code: SVW).

The diagram below provides an overview of the Group structure:

Industrials	Industrials	Industrials	Energy	Media
WesTrac 	Coates	BORAL	 SGH Energy	
100%	100%	26% - June 2021 70% - July 2021	Beach 30% SGHE 100%	40%
WesTrac is one of the largest CAT dealers globally (by sales) operating the WA and NSW/ACT territories	Coates is the largest industrial and general equipment hire company with complementary Specialist Services	Boral is a national building products and construction materials Group	Beach Energy is a leading mid-cap E&P business and a key supplier to a growing East Coast gas market	Seven West Media is a leading diversified media company in Australia
28 branches	157 branches	367 sites	Onshore and offshore assets in multiple basins	Monthly Australia-wide audience reach of:
FY21 \$3.8bn revenue	FY21 \$0.9bn revenue	FY21 \$2.9bn revenue (continuing operations)	SGH Energy holds operated and non-operated oil and gas interests including 15% of the Crux LNG Project	16.4m in Seven Network - 6.1m in 7Digital - 3.9m in WAN + digital - 9.2m 7Plus active users
Focus on customers in direct mining, mining contractors, construction and infrastructure	Focus on large tier-one customers, mid-tier and trade, engineering and industrial solutions	Focus on infrastructure, commercial and residential construction		
Employees	Employees	Employees	Employees	Employees
~3,800	~2,000	~5,000	~700 (Beach)	~2,000

The Group primarily operates within Australia; with smaller operations in Indonesia, the United States of America, the United Arab Emirates, South Africa and New Zealand. SGH's controlled entities are detailed in Note 32: Controlled Entities in the [2021 Annual Report](#).



Focus

This Statement focuses on the following material entities within the Group:

- WesTrac Pty Limited (WesTrac) - ABN 63 009 342 572; and
- Coates Group Holdings Pty Limited (Coates) - ABN 85 126 069 341.

WesTrac and Coates are 100% owned by SGH. WesTrac and Coates have also prepared individual Modern Slavery Statements which can be found on their website.

SGH also held significant equity accounted investments in the following entities who prepare their own standalone Modern Slavery Statements:

- Beach Energy Limited (Beach) - 30.0 per cent ownership interest;
- Boral Limited (Boral) – 26.1 per cent ownership interest; and
- Seven West Media Limited (Seven West Media) – 40.2 per cent ownership interest.

These entities were not controlled by SGH in FY21. Modern slavery risks relating to entities not controlled by SGH are excluded from the scope of this Statement, however, a high-level overview of their assessment is included in this Statement as SGH nominated directors have sought to apply similar standards to SGH for these associated entities whilst respecting their standalone governance structures. The Modern Slavery Statements for these entities can be found on their individual websites.

Subsequent to 30 June 2021, the Group's ownership interest in Boral Limited increased from 26.1 per cent to 69.6 per cent. Accordingly Boral will be incorporated into the Group's FY22 Statement as a material Group entity.

What is modern slavery?

Modern slavery is when coercion, threats or deception are used to exploit individuals and deprive them of their freedom.

The Modern Slavery Act defines modern slavery to include:

- trafficking in persons
- slavery
- servitude
- forced labour
- debt bondage
- deceptive recruitment
- forced marriage, and
- the worst forms of child labour: situations where children are subjected to slavery or similar practices or engaged in hazardous work.

Modern slavery victims¹

Approximately 40 million globally

71% are women and girls

Approximately 25 million in forced labour

1. Estimate from International Labour Office, 2017.

This Statement addresses the United Nations Sustainable Development Goal 8.7, which calls for: Immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.



Approach

As a diverse organisation operating in different industries and with different supply chains, each business undertakes their own review of modern slavery risks and processes for addressing modern slavery risks in their supply chain.

Modern Slavery means conduct which would constitute slavery, servitude, forced labour, deceptive recruiting for labour or services, forced marriage, trafficking in persons, organ trafficking, harbouring a victim, debt bondage, and the worst forms of child labour.

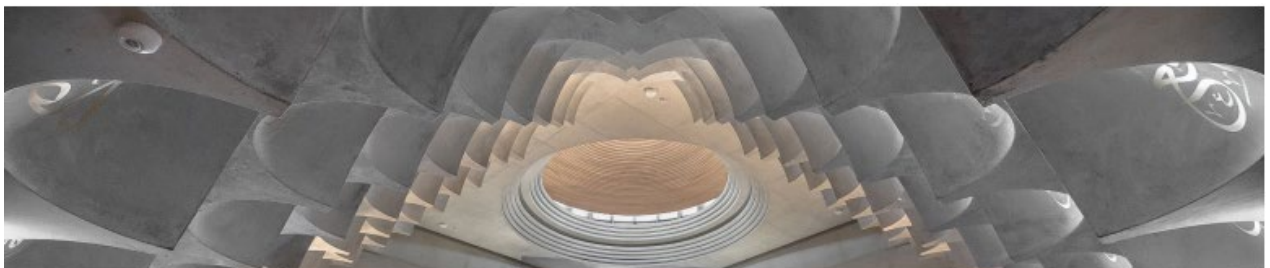
The Act requires entities based or operating in Australia which have an annual consolidated revenue of at least \$100 million to report on the risks of the modern slavery in their operations and supply chains and the actions taken to address those risks.

This Statement is a joint statement with a focus on material entities wholly owned by SGH, WesTrac and Coates, whose annual revenue is in excess of \$100 million. Whilst there are other wholly owned entities within the Group, these entities do not currently meet the \$100 million revenue criteria and therefore have not been specifically referred to in this Statement. However, all wholly owned entities operate under the Governance Framework set by the SGH Board.

It is recognised that our business activities could impact human rights of people and communities and acknowledged that all products and services may carry the risk of modern slavery in the supply chain. As a diverse organisation operating in different industries and with different supply chains, each business undertakes their own review of modern slavery risks and processes for addressing modern slavery risks in their supply chain.

The Group's framework for addressing Modern Slavery risks is outlined below:

1. Governance – review of risk management framework and key policies. Questions on modern slavery are incorporated into a bi-annual questionnaire circulated to senior management across the Group to identify any areas of concern.
2. Risk assessment – consideration of key risk areas and classification to allow higher risk areas to be targeted and mitigated.
3. Process – embedding modern slavery considerations into supplier negotiations and agreements when procuring goods and services and stakeholder engagement.
4. Training – education and training of employees to raise awareness on modern slavery and mechanisms for reporting or escalating any grievances (eg whistleblower options).
5. Monitoring, reporting and continuous improvement – escalation of any areas of concern through to Group Executives and/or the Board as required. Assessing the effectiveness of processes to identify and minimise the risk of modern slavery. Improving on current practices and sharing of best-practice ideas across the Group.



Governing Framework

The Board is empowered to manage the business of SGH subject to the Corporations Act and the Company's Constitution. The Audit & Risk Committee has responsibility for overseeing the Group's response to modern slavery risks. The Board has responsibility for the review and approval of this Statement.

As outlined in the Group's [2021 Corporate Governance Statement](#), the Group has a solid framework to oversee the operations of the Group and instil a culture of acting lawfully, ethically and responsibly. The Group's core values include respect, owner's mindset, courage and agility.

SGH's key operating principles and policies include:

- Codes of Conduct – [Code of Conduct for Directors](#) establishes guidelines for the conduct of Directors, including in matters such as ethical standards and the disclosure and management of conflicts of interest. [Employee Conduct Guidelines](#) have also been adopted by the Group for employees to guide employees on how to act and clarify how the Company expects employees to perform.
- [SGH Whistleblower Policy](#) – provides guidance on how to escalate concerns about suspected or actual unethical or unlawful behaviour.
- [SGH Fraud and Corruption Policy](#) – provides guidance on the expected conduct for the investigation of fraud, corruption or other similar irregularities.
- [SGH Diversity Policy](#) – outlines SGH's commitment to achieve a diverse and inclusive work environment having regard to diversity factors such as gender, age and cultural background.

These documents are available on the SGH website.

The approach to the procurement of goods and services is underpinned by the [Employee Conduct Guidelines](#). Those involved in procurement needs to act fairly and ethically.

The Group has an established Risk Management Policy to ensure there is a consistency in the methods used in assessing, monitoring and communicating risks throughout the Group and that risk management efforts are aligned with SGH's strategic and business objectives.

Group Executives are responsible for reviewing emerging risks and opportunities, leading stakeholder engagement and facilitating the sharing of best practices across the Group. Each business unit reports periodically on key risks in their business unit to the Audit & Risk Committee as well as complete a bi-annual questionnaire to highlight any concerns around modern slavery risks.

Material business risks are delegated to appropriate Executive Management. Each Group Executive's performance is assessed across a variety of key performance indicators including financial and non-financial metrics.

A centralised whistleblowing hotline (RightCall) allows employees to escalate any concerns to an external service provider, allowing anonymity to be provided if required. This ensures impartiality into the investigation and removes any actual or perceived conflict of interest. RightCall will raise any concerns raised with the Chair of the SGH Audit & Risk Committee.

***Educating our
employees on
warning signs in our
diverse supply chains
is essential to
address Modern
Slavery risks as our
knowledge and
understanding of
Modern Slavery risks
grows.***

Operations

SGH has a clear process and policy relating to the reporting and remediation of Modern Slavery within our supply chain.

The Group has a large and diverse network of business partners and suppliers and strives to provide safe and sustainable equipment solutions and prioritises the safety and well-being of its employees and customers.

The Group primarily operates within Australia with smaller operations in other countries such as Indonesia, the United States of America, the United Arab Emirates, South Africa and New Zealand.

Further information on our businesses is set out in the [2021 Annual Report](#) which is located on our website www.sevengroup.com.au.

WesTrac and Coates have a long and proud history of operations in Australia and are recognised as leading Australian brands within the industries in which they operate.

WesTrac

WesTrac is the sole authorised Caterpillar dealer in Western Australia (WA), New South Wales (NSW) and the Australian Capital Territory (ACT). WesTrac operates 28 branches across WA, NSW and the ACT and provides customers with a wide range of earth moving machinery and construction equipment including comprehensive whole-of-life management solutions. WesTrac works closely with Caterpillar to provide customers with unique and innovative solutions and remains committed to being our customers' first choice in equipment solutions. At 30 June 2021, WesTrac employed 4,447 personnel nationally, of which 3,740 were employed directly by WesTrac and 707 were employed indirectly through labour hire providers.

Coates

Coates Group has two companies within its group that provides equipment hire solutions: Coates Hire (Coates) and PT Coates Hire Indonesia (PT Coates). Coates is Australia's leading industrial and general equipment hire provider with complementary Specialist services and operates across a range of markets including engineering, mining and resources, infrastructure, manufacturing, construction, agriculture and major events revenue. Coates' vision is to be the market leader in safe, smart and sustainable equipment solutions. To support this vision, Coates' values: Care Deeply, Be our Best, Customer Focused and One Team, guide the way that the Coates team works to achieve their goals and drive the growth of the organisation and improve customer experience. Coates has over 2,000 employees, with branches in over 150 metropolitan, regional and remote locations across Australia. In addition, Coates has five branches operating in Indonesia managed by PT Coates.

Supply Chain Risks

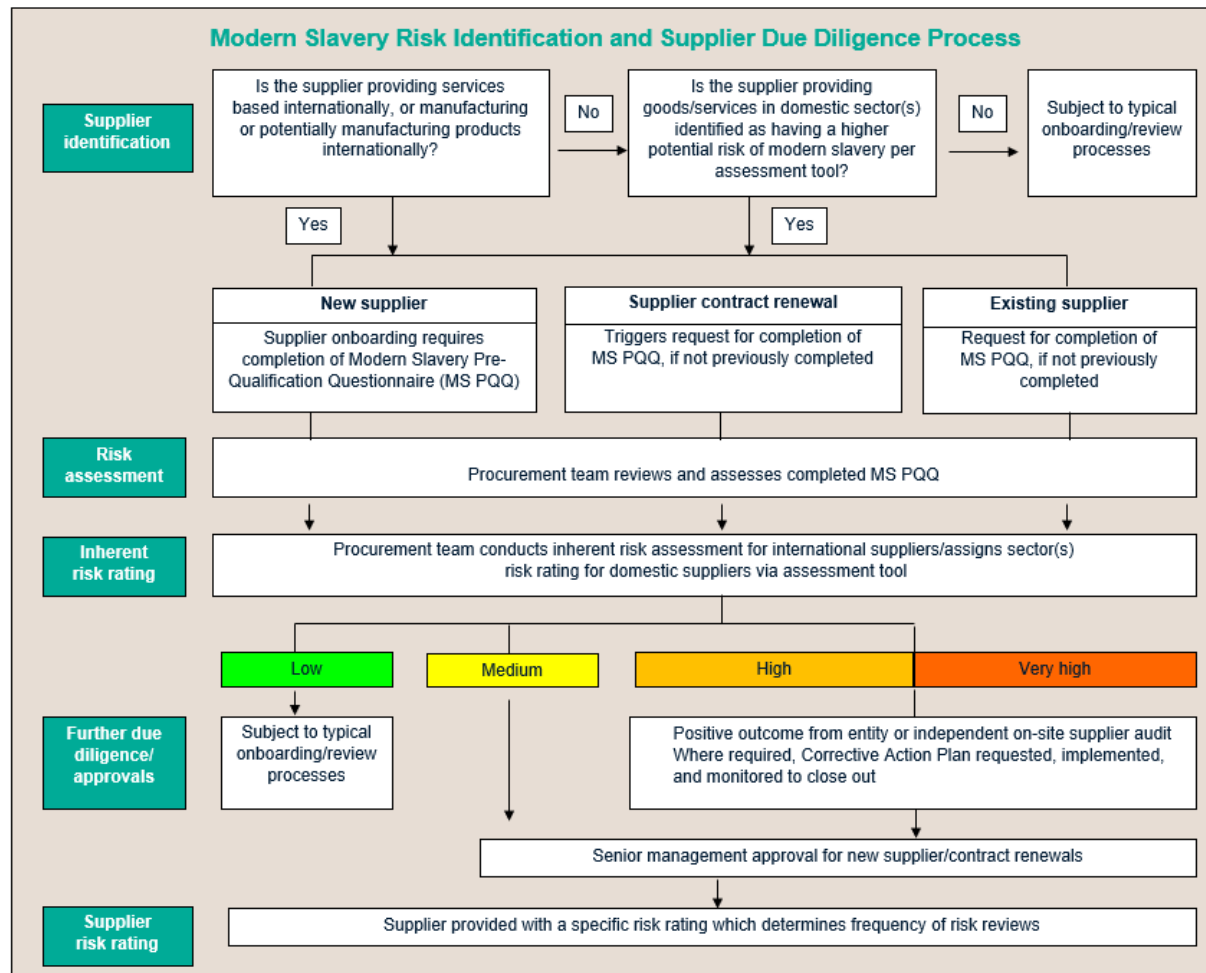
The Group procures goods and services across a wide range of industries and recognises there is a risk of modern slavery in supply chains. Risk assessments have been undertaken to identify and begin to address higher risk areas.

PROCUREMENT ACTIVITIES		
Goods for resale or hire Goods acquired for resale (product sale) or hire as well as goods used in providing product support services to customers.	Goods for use Goods to support the Group's operations such as industrial parts and consumables, IT equipment, uniforms, tooling and office supplies.	Services Services such as leased properties, facilities management, energy, IT, financial services, legal, compliance, marketing, freight and logistics.

The majority of procurement by the Group is from Caterpillar Inc (Caterpillar), domestic Australian suppliers or domestic labour governed by Australian employment law.

Supplier Modern Slavery Due Diligence

Following completion of our Modern Slavery Management Standard Operating Procedure (MSM SOP), which was prepared in consultation with our Procurement and Risk teams, from FY22 we are progressively rolling out our modern slavery risk identification and supplier due diligence approach across new and existing suppliers.



The Group also has small operations in foreign countries and acknowledges that there is a higher risk of modern slavery in some of these jurisdictions. The Group continues to work with these operations to assess and address modern slavery risks within this framework.

Awareness and Training

In FY21, the Group launched initiatives to raise awareness of modern slavery, including communications to all staff members, in the form of emails, posters and a toolbox talk by site leaders. These initiatives aimed to highlight our revised Human Rights Policy and Supplier Code of Conduct; describe what modern slavery is and highlight its prevalence; and explain how all staff members can report concerns. These communications also reinforced SGH's grievance mechanisms, including our whistleblower reporting service, RightCall. These initiatives were rolled out across the Group in FY21.

Staff members from our Procurement and People & Culture teams completed our 'Introduction to Modern Slavery' training program in FY21. The training program describes the:

- types of modern slavery practices;
- requirements of the Modern Slavery Act;
- prevalence of modern slavery; and
- actions SGH is taking to assess and manage modern slavery risk.

WesTrac

WesTrac has assessed its Modern Slavery risk based on manufacturing activities where factories are producing the final product for resale, focusing on operations, industries, or products classified as 'high risk' as referenced against the [Global Slavery Index](#) (Global Slavery Index).

As an Original Equipment Manufacturer (OEM) dealer, WesTrac has commercial obligations to purchase from Caterpillar, a global group headquartered in the USA with manufacturing operations in multiple countries. Caterpillar has undertaken its own due diligence to investigate [Modern Slavery risks](#) in its supply chain and has a published Slavery and Human Trafficking Statement. Within the statement Caterpillar notes its commitment to respecting internationally recognised human rights throughout its global operations as noted in the company's Human Rights Policy and Supplier Code of Conduct.

Caterpillar's Human Rights policy outlines that the company is committed to respecting recognised human rights principles aimed at promoting and protecting human rights in the countries in which they operate. Consistent with Caterpillar's commitment, and in accordance with applicable law and practice, Caterpillar:

- do not condone and strive to eliminate all forms of forced labour, child labour, and discrimination in the workplace;
- work to establish safe and healthy working conditions;
- value diversity as a foundational key to the success of our business strategy;
- seek to compensate our employees fairly and competitively where they work; and
- respect principles of freedom of association and the right to collective bargaining.

Caterpillar believes the risk of modern slavery is low in its operations and those of its direct suppliers and is taking actions to address modern slavery risk where it may potentially exist. Caterpillar is committed to working with its diverse network of business partners and suppliers to uphold the principles in their policy and expect their suppliers to comply with obligations set forth in their Supplier Code of Conduct.

WesTrac has assessed the risk of goods sourced from Caterpillar as being low due to the stringent controls that Caterpillar has in place and its global reach.

The majority of goods procured by WesTrac are sourced from Caterpillar for resale and include heavy machinery and components for construction and mining applications. Goods sourced from non-Caterpillar suppliers include items used to modify, service or maintain Caterpillar equipment or to support business operations including tooling, stationary, clothing, merchandise, IT and communication hardware.

WesTrac has assessed that the Australian based suppliers engaged in FY21 present a low risk of Modern Slavery within their direct supply chain.

The majority of non-Caterpillar goods are sourced from Australian based businesses. In addition, 84 per cent of WesTrac's workforce is employed directly by WesTrac in accordance with Australian laws, applicable modern awards and enterprise agreements with the remaining 16 per cent employed through labour hire providers who are required by WesTrac to compensate personnel in accordance with applicable modern awards and enterprise agreements.



Coates

Coates is committed to minimising the risk of modern slavery practices in its supply chain. As an equipment solutions provider, Coates has over 4,200 suppliers. In FY21, approximately 90 per cent of Coates' products are sourced from domestically based suppliers who source their equipment both domestically and globally. Other suppliers include those based in New Zealand, the European Union, the United States of America, the United Kingdom, Japan, China and Taiwan. The majority of PT Coates' key suppliers for capital expenditure are consistent with suppliers for Coates. This covers the larger component of the Coates Indonesia supplier profile.

Coates has identified the biggest risks of modern slavery practices to exist with respect to overseas manufacturers of equipment, particularly manufacturers that operate and/or produce goods in sovereign states that do not have globally accepted standards for labour or the appropriate regulatory mechanisms in place to police breaches of those standards.

With respect to services acquired by Coates, these are done so domestically with suppliers bound by domestic employment and other laws.



Actions Taken and Effectiveness Assessment

With an extensive supply chain, the Group recognises that our procurement activities have social and environmental impacts and is committed to working with suppliers to understand and minimise impacts from our business operations.

The process to identify modern slavery risk across the Group is subject to an annual review to assess the effectiveness and make any necessary improvements.

WesTrac

During FY21, WesTrac mapped the first level of its multi-tier non-Caterpillar supply chain to identify products which are 'high' risk. The 'Global Slavery Index' and information available through the Australian Strategic Policy Institute were used to identify high risk product categories.

An electronic questionnaire was distributed to 122 suppliers with responses evaluated and subsequently reviewed by a Steering Committee. Of the 122 suppliers, 78 responded, 13 officially declined to respond and 31 did not respond. Five suppliers were assessed as posing a higher risk of modern slavery in the WesTrac supply chain. Remediation efforts vary between suppliers, however, all five suppliers have publicised their efforts to remediate any suspected occurrences or issues of modern slavery in their FY21 Statements.

WesTrac's Steering Committee developed actions including:

- collaborate with higher risk suppliers to understand their supply chain and their actions to combat Modern Slavery;
- investigate substitute suppliers and/or products where applicable;
- join a Perth-based community against Modern Slavery to allow knowledge transfer and increase leverage on non-conforming suppliers; and
- issue non-conformance notices to all non respondents.

WesTrac's Modern Slavery Framework is based on best practice provided by the Walk Free Foundation and includes five pillars:

- policy and governance;
- communicating expectations;
- potential suppliers;
- WesTrac employees; and
- managing our risk.

WesTrac implemented additional checks on the existing suppliers identified as high risk to better evaluate their processes and controls. WesTrac's standard terms and conditions require suppliers to warrant that they have thoroughly investigated their labour practices and those of their direct suppliers to ensure there is no Modern Slavery within their supply chains and WesTrac has the right to audit suppliers.

WesTrac use a continuous review approach to modern slavery due diligence across domestic and international suppliers. Suppliers for audit will be selected based on manufacturing activities where factories are producing the final product for resale, including where operations, industries, or products are classified as "High Risk" as referenced against the Global Slavery Index.

WesTrac have a clear process and policy relating to the reporting and remediation of modern slavery within their supply chain. Any person who suspects any form or involvement of modern slavery is to report the incident to the National Procurement Manager (NPM) in accordance with WesTrac reporting guidelines. The NPM is responsible for entering the incident into the Incident Management and Corrective Action System to record and monitor. This system provides automatic escalation for inaction should any stakeholder fail to complete the required actions.

Anonymous and external reporting or escalation has been implemented and is available should the reporting party desire anonymity.

Any suspected occurrence of modern slavery in the value chain is to be investigated by a third-party due diligence team to ensure impartiality into the investigation and remove any actual or perceived conflict of interest.

The Steering Committee reviews the actions and effectiveness and deficiencies or improvements are addressed as they arise. Although WesTrac did not manage to significantly develop its relationship with other businesses or community interest groups to the level desired, it delivered on its commitment to implement a data analytic Modern Slavery evaluation system and utilised the results as the basis for their FY21 Statement. WesTrac also delivered on its commitment to inform employees through education sessions highlighting warning signs and how it relates to the employee's position in the value chain and WesTrac's actions to eradicate it from its supply chain.

WesTrac will look to engage with local Modern Slavery interest groups to further increase knowledge transfer and leverage in influencing the practices of larger suppliers.

Coates

Coates is committed to minimising the risk of modern slavery practices in its supply chain.

Coates has in place policies and practices which reflect its commitment to act ethically and with integrity and transparency in regards to its employment practices and to comply with applicable employment laws. These policies include the Equal Employment Opportunity Policy, the Discrimination, Harassment and Bullying Policy, Grievance Policy as well as the Employee Code of Conduct which have been developed to promote a safe and positive work environment. Coates has also committed to, and is working towards, implementing a Human Rights policy in FY22.

A questionnaire was distributed to many of Coates' suppliers to ascertain other risks that may exist further down its supply chain. To mitigate the risk of modern slavery practices more generally, Coates requires its suppliers to provide contractual warranties assuring Coates that the supplier does not engage in modern slavery practices, and that the supplier is not aware of such practices existing in its supply chain. In addition, all of Coates' suppliers are bound by the Supplier Code of Conduct, which requires suppliers to comply with international and domestic regulations relating to modern slavery.

Coates has implemented a rigorous supplier risk assessment process whereby suppliers are assessed against a criterion to identify businesses that have a high risk of engaging in modern slavery practices either directly or indirectly through its supply chain. Key factors to be considered when assessing suppliers under the policy include geographical location of the supplier's production facilities, where materials are sourced from, policies and procedures the supplier already has in place and any known history of modern slavery or related practices.

Where a supplier that is classified as 'high risk' fails to implement processes to mitigate the risk of modern slavery practices, Coates may in the future cease dealings with the supplier if remediation actions, such as implementing appropriate policies and procedures, are not undertaken.

To mitigate the risk of modern slavery practices more generally, Coates requires its suppliers to provide contractual warranties assuring Coates that the supplier does not engage in modern slavery practices, and that the supplier is not aware of such practices existing in its supply chain. In addition, all of Coates' suppliers are bound by the Supplier Code of Conduct, which expressly requires suppliers to comply with international and domestic regulations relating to modern slavery.

Supply Chain Assessment

To help identify and assess the risk of modern slavery practices in its supply chains, Coates distributed a questionnaire to its suppliers. The questionnaire focused on ascertaining whether any (and if so which) suppliers had operations in, or dealt with suppliers in, high risk countries and/or categories.

A preliminary assessment of the over 800 responses received have revealed that 3 per cent of suppliers were identified as having manufacturing sites located in high risk countries. Furthermore, 11 per cent of these suppliers were identified as sourcing materials fundamental for their business activities from high risk countries.

Next Steps in the Supply Chain Assessment process

Having gathered the data from a proportion of its suppliers, Coates now intends to take steps to conduct a more rigorous risk assessment by extending the coverage of supplier responses in a follow-up questionnaire and further exploring specific risk factors through consideration of key factors including but not limited to (in addition to the above-referenced key factors):

- the supplier category;
- any relevant policies and procedures the supplier already has in place;
- any known history of modern slavery or related practices;
- whether the supplier employs vulnerable people; and
- whether a supplier code of conduct was implemented and cascaded through its supply chain.

Coates will work through its supplier list systematically, starting with a full assessment of its key suppliers and the suppliers that have responded to the questionnaire. Thereafter, Coates will take steps to conduct a further review of its remaining suppliers. A similar process will be replicated for PT Coates in Indonesia.

Upon completion of the assessment process, if a supplier that is classified as 'high risk' fails to implement processes to mitigate the risk of modern slavery practices, Coates may cease dealings with the supplier until such time as remedial actions, such as implementing appropriate policies and procedures, are undertaken.

Effectiveness of Processes

The assessment process is still in its early stage and its effectiveness can't yet be measured in a reliable manner. Once the initial risk assessment process has been completed, a yearly audit will be implemented to analyse the effectiveness of Coates' processes and whether the current policies that Coates has in place have the intended effect of encouraging high/medium risk suppliers to implement policies and procedures to combat modern slavery. The audit will allow Coates to make any necessary improvements.

Equity Accounted Investments

Below we summarise the Modern Slavery Statements of SGH's material equity accounted investments Beach Energy Limited, Boral Limited (for FY21) and Seven West Media that can be found on their respective individual company websites.

Beach Energy Limited

Beach is committed to the removal of Modern Slavery from its supply chains and has made substantial progress on its first Modern Slavery Statement. Beach has made significant progress on the three-year Action Roadmap defined in its FY20 Statement and is on-track to meet all of the commitments set out by the end of 2022.

Beach's FY21 actions included:

- modern slavery considerations included in supplier engagement processes;
- improved tendering and onboarding processes to include consideration of modern slavery risk;
- developed and commenced distribution of the 'Beach Supplier Expectations' document to educate suppliers about Beach's expectations in respect of modern slavery;
- extended the Beach Modern Slavery Assessment Framework to additional supplier tiers;
- further engaged and assessed Beach's suppliers for potential modern slavery exposure (suppliers representing 94 per cent of FY21 spend);
- collaborated with suppliers and other organisations to share knowledge and best practices; and
- developed key performance indicators to assess the impact of actions on the risk of modern slavery in their supply chains.



Boral Limited

Boral takes a Group-level approach in assessing and managing modern slavery risk across their entities, including governance, risk management, policies, procedures and systems. Boral's Modern Slavery Statement 2021 was published in October 2021.

During the year, Boral set goals and targets aligned with the 17 priorities across the four key areas of their Sustainability Framework. Boral's progress on their commitment to strengthening their approach to modern slavery included:

- facilitating a Modern Slavery Risk workshop to update the assessment of Boral's supplier and supply chain risk profile. The assessment will refresh identification of those suppliers with the highest inherent modern slavery risk and help to plan actions to mitigate the associated risk;
- review and refine standard procurement contract clauses and implement a process for having new vendors formally acknowledge the Supplier Code of Conduct;
- review and broaden supply chain mapping and risk assessment, update supplier pre-qualification evaluation questionnaire and conduct detailed assessment of existing suppliers;
- promoting awareness of whistleblower (FairCall) reporting mechanism;
- develop and roll out modern slavery training for procurement teams;
- define procedures and quantitative indicators for assessing effectiveness; and
- actively seeking to collaborate multi-stakeholder initiatives to build further capability and knowledge.



Seven West Media

Seven West Media have undertaken a review of their operations and supply chains for the entities under their control to assess the risk of modern slavery practices in those supply chains. The review also included a consultation process with representatives from Procurement, People and Culture, Legal, Finance and Senior Leadership. Focus was applied to those suppliers assigned a high-risk rating. The Seven West Media Procurement policy and procedures were amended to include conducting pre-qualification and due diligence before the engagement of new suppliers, and clearly communicating expectations of active suppliers.

Modern slavery training was developed and launched to improve awareness of modern slavery risks and equip management and others involved in contracting with the processes they need to follow to handle and manage modern slavery issues. A Steering Group has been established to provide a forum for regular engagement and feedback and a central point created to track actions taken.



Consultation

Both WesTrac and Coates have prepared individual Statements. These Statements are provided to their entity level Board for review and approval.

Whilst it is appreciated that the Group could have merely undertaken this disclosure at an SGH level, it was concluded that WesTrac and Coates were actively engaged in ensuring compliance with our Modern Slavery obligations and as such, staff at the respectively controlled operating companies felt strongly about publishing their own Modern Slavery Statement.

A Group wide questionnaire is distributed bi-annually to senior management to allow concerns around modern slavery to be escalated to the SGH Audit & Risk Committee and/or Board. Members of our Modern Slavery Working Groups have engaged with industry experts to keep abreast of learnings and evolving good practice in terms of improving managing modern slavery risk, and engaged with our stakeholders, including our investors, to understand and respond to their evolving expectations.

This Statement also considers feedback gained from the Group's external advisors who assessed our Statement, in light of evolving good practice and guidance published by Australian Border Force.

This Statement has been authorised by the Board of Seven Group Holdings Limited.



Ryan Stokes AO
Managing Director & Chief Executive Officer
16 December 2021

