

Modern Slavery Statement

FY22



ServiceStream

Modern Slavery Statement

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22 December 2022

Att: Australian Border Force

Service Stream Limited

Modern Slavery Statement FY22

Service Stream Limited (ABN 46 072 369 870) is pleased to submit this modern slavery statement pursuant to the *Modern Slavery Act 2018* (Cth) in respect of the financial year 1 July 2021 – 30 June 2022 (“**FY22 Reporting Period**”).

Reporting Entities Joint Statement

Service Stream Limited is submitting a joint modern slavery statement on behalf of itself and the following wholly-owned subsidiaries:

Service Stream Holdings Pty Ltd (ABN 58 008 027 978)	Service Stream Maintenance Pty Ltd (formerly Lendlease Services Pty Ltd) (ABN 87 081 540 847)
Service Stream Fixed Communications Pty Ltd (ABN 94 067 943 873)	Westlink (Services) Pty Limited (ABN 21 096 511 376)
Service Stream Mobile Communications Pty Ltd (ABN 74 095 043 057)	EnerSafe Pty Ltd (ABN 90 120 507 066)
Service Stream Energy & Water Pty Ltd (ABN 11 098 326 179)	Comdain Gas (Aust) Pty Ltd (ABN 34 099 283 271)
Service Stream Utilities Pty Ltd (formerly Comdain Infrastructure Pty Ltd) (ABN 50 092 035 419)	Comdain Services Pty Ltd (ABN 44 160 096 079)
Comdain Civil Constructions Pty Ltd (ABN 38 092 269 040)	Comdain Civil Constructions (QLD) Pty Ltd (ABN 32 136 971 741)
Radhaz Consulting Pty Ltd (ABN 16 119 544 071)	TechSafe Australia Pty Ltd (ABN 37 097 315 341)

In this modern slavery statement, Service Stream Limited and the aforementioned subsidiaries are referred to as the “**Service Stream Group**”.

The Service Stream Group is an essential network service provider. The Group designs, constructs, operates and maintains critical infrastructure networks across the Telecommunications, Utilities and Transport sectors. Services are provided on behalf of Government, Government-related entities and private asset owners/ network operators.

Modern Slavery Statement

FY22

The Service Stream Group's principal governing body is a [Board of Directors](#) and the group is governed by a single [Corporate Governance Statement](#). The Service Stream Group's corporate support, sourcing and supply chain functions are managed centrally for all group entities, with many shared suppliers across the group. All group entities follow the policies and processes set by the Board.

The Service Stream Group's consolidated revenue for the FY22 Reporting Period was in excess of AU\$1,500 million as reported in the [2022 Annual Report](#).

For these reasons the Service Stream Group is providing a single, consolidated modern slavery statement.

Consultation

The Managing Director and the Company Secretary of Service Stream Limited are, respectively, an executive director and the company secretary of each entity within the Service Stream Group (apart from Westlink (Services) Pty Ltd where there are other directors who report to the Managing Director). The Managing Director, Company Secretary and the Executive Management of each entity within the Service Stream Group were consulted during preparation of this modern slavery statement. The Managing Director and Company Secretary attended an Audit & Risk Committee meeting where the content of this modern slavery statement was tabled for review and endorsement.

The Managing Director has endorsed this modern slavery statement.

Structure, Operations and Supply Chains

Structure

The Service Stream Group is listed on the Australian Stock Exchange (ASX: SSM). The group is comprised of a parent public company (Service Stream Limited) and privately incorporated wholly-owned subsidiaries. All entities are incorporated in Australia.

As at 30 June 2022, the Service Stream Group consisted of approximately 4900 employees and operated from more than 80+ sites across Australia. Our direct employees are engaged either by contract or under award agreements. As at 30 June 2022, the Service Stream Group had approximately 33 collective industrial instruments and seven unions, with whom our employees are free to associate. The registered office for all group entities is located at Level 4, 357 Collins St Melbourne VIC 3000. The Service Stream Group does not operate from any overseas locations.

Service Stream Limited is a parent of a number of other wholly-owned subsidiary companies. Additionally, some group entities are a shareholder in incorporated joint venture entities with other third parties. These other subsidiaries and joint ventures are either not revenue-generating entities or are not reporting entities for the purposes of the *Modern Slavery Act 2018* (Cth) and are therefore not included in this joint statement. Details of all Service Stream Limited subsidiaries and joint ventures as at 30 June 2022 are set out in the [2022 Annual Report](#).

Modern Slavery Statement

FY22

Operations

The Service Stream Group acquired Service Stream Maintenance Pty Ltd (formerly Lendlease Services Pty Ltd) and its controlled entities on 1 November 2021. This resulted in a re-organisation of its segments with the creation of a new division, Transport, and the combining of the Telecommunications and Utilities segments into Service Stream's existing structure.

The principal services of the Service Stream Group's three operating segments during the FY22 Reporting Period were as follows:

1. Telecommunications

Telecommunications provides a wide range of operations, maintenance, installation, design and construction services to the owners of fixed-line and wireless telecommunication networks in Australia. Service capability includes customer connections; service and network assurance; site acquisition, design, construction and installation of fixed-line, wireless and broadband services, as well as minor projects for asset remediation, augmentation and relocation.

2. Utilities

Utilities provides a wide range of specialist metering, new energy, inspection & compliance, operations, maintenance, design & construction services to utility network owners and operators and other customers in Australia. Service capability includes asset upgrades and replacement, engineering, design and construction of network assets and energy-related products, meter reading and network assurance, as well as specialist inspection, auditing and compliance services.

3. Transport

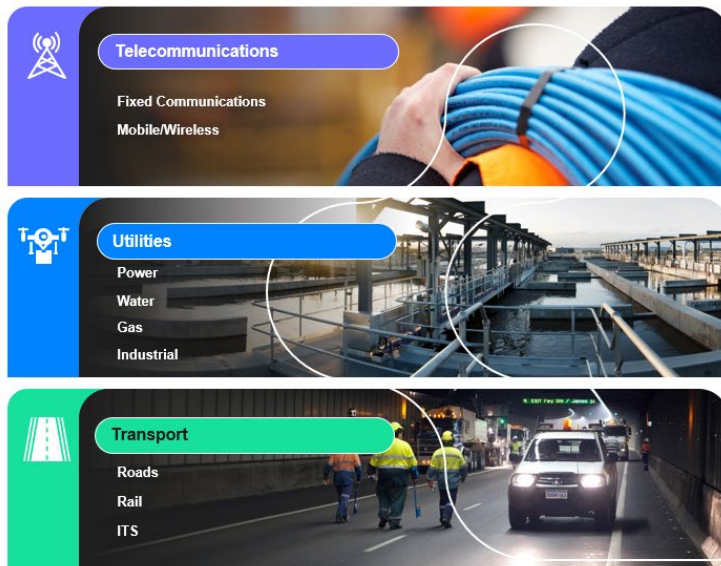
Transport provides a wide range of specialist operational support and maintenance services to public and private road and tunnel asset owners across Australia. Service capabilities include road network maintenance, control room operations, minor civil construction services and installation and operation of intelligent transport systems.

The Service Stream Group did not have any international operations during the FY22 Reporting Period.

As detailed in the [2022 Annual Report](#), one Service Stream Group entity is a party to four incorporated joint venture arrangements across NSW, SA, VIC and QLD, and two Service Stream Group entities are parties to one unincorporated joint venture arrangement where the principal place of business of the joint operation is in NSW.

Modern Slavery Statement

FY22



ASX300

ASX listed company since 2004



4,500+
employees

and a pool of 5,000+
skilled subcontractors



80+ locations

Offices and warehouses nationally



Supply Chains

The products and services (including labour) that contribute to the Service Stream Group's principal services in its three operating segments include:

- A national workforce consisting of employees and more than 5,000+ contractors who are engaged by the Service Stream Group to perform certain field services, for example a telecommunications technician that performs customer connections of broadband services. This field workforce is located in Australia.
- The supply of materials to clients under services contracts, for example the supply of solar panels to an energy retailer under a contract for the installation of solar PV systems on residential premises. Some of these materials are manufactured overseas and are supplied to the Service Stream Group by distributors located in Australia. The Service Stream Group does not manufacture any materials itself.

Risks of modern slavery practices in the operations and supply chains of the Service Stream Group

The Service Stream Group is a provider of essential network services in Australia, including access, design, build, installation and maintenance activities. Each of the three operating segments in the Service Stream Group engage a large subcontractor field workforce to carry out the principal activities whereby the relevant operating entity will contract with a corporate contractor (for example, a company or trust) that employs workers to perform the principal field services.

We have assessed that the most salient risk of modern slavery practices occurring within our supply chains is within our subcontracted labour workforce, in particular those prime subcontractors that employ migrant workers with limited ability to read or write in English. A risk of modern slavery exists in any industry that relies on a manual, low-skilled migrant workforce, such as the construction, real estate, security and cleaning industries. This risk is more present where the services occur in emerging overseas economies. The risk is lessened in developed economies with robust workplace relations laws such as Australia, where Service Stream's operations are entirely located.

Modern Slavery Statement

FY22

Actions taken by the Service Stream Group to assess and address these risks, including due diligence and remediation processes

Due diligence

During previous reporting periods, the Service Stream Group has conducted extensive reviews of all relevant direct subcontractors and suppliers to assess whether modern slavery practices were occurring in the Service Stream Group's supply chains.

During the FY22 Reporting Period the Service Stream Group acquired Service Stream Maintenance Pty Ltd (formerly Lendlease Services Pty Ltd) and its controlled entities. In order to assess whether any modern slavery practices were occurring within the acquired operations and supply chains, we undertook an extensive review of all relevant direct subcontractors and suppliers to Service Stream Maintenance Pty Ltd during the FY22 Reporting Period. To progress this supply chain review we:

- prepared a survey with a series of questions based on the indicators of modern slavery practices as advised by the Australian Government in the [Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities](#);
- issued the survey to representatives of more than 2200 direct suppliers and prime subcontractors; and
- issued follow-up questions directly to select respondents where we sought additional information.

On conclusion of the supply chain review, we had greater insight and assurance that, based on the responses to the surveys, the subcontracted workforce engaged by Service Stream Maintenance Pty Ltd and its controlled entities to perform our principal field services, and the materials procured from suppliers to service those principal services, are not considered to be a high risk of engaging in modern slavery practices.

Remediation

The Service Stream Group engages a full time Health, Safety, Environment & Quality Team with resources in every State providing advice, coaching and support to employees and subcontractors in managing safe and lawful work practices. To ensure every worker is safe while working for the Service Stream Group, our HSE specialists provide in-person field supervision of our field workforce and regularly engage with clients and other stakeholders to drive improvement in risk management practices across the wider industry and provide practical tools, such as the Field Supervision 'My Safety Handbook' to facilitate conversations between frontline managers/supervisors and our subcontracted workforce. More detail on the Service Stream Group's programs targeted at Health & Safety, Environment, Community, People and Governance can be found in our [2022 Sustainability Report](#).

The Service Stream Group has implemented specific controls targeted at minimising the risk of modern slavery practices occurring in its operations and supply chains. These include:

- a modern slavery prequalification questionnaire for new subcontractors and suppliers being onboarded to the Service Stream Group;
- anti-modern slavery provisions, audit rights and reporting requirements in the Service Stream Group's standard-form supply and subcontracting contracts;
- training staff to increase their understanding of the requirements of the *Modern Slavery Act 2018* (Cth); and

Modern Slavery Statement

FY22

- confidential reporting of complaints through an independent and confidential whistleblower hotline, “Stopline”.

How the Service Stream Group assesses the effectiveness of these actions

In future reporting periods the Service Stream Group’s internal audit function will conduct a scheduled review of the implemented modern slavery controls to determine:

- how effectively the controls have been implemented;
- if the controls are meeting their objectives; and
- whether more controls are needed.

The internal auditor reports on the outcome of these reviews to the group’s Audit & Risk Committee, which is attended by the Board and Executive Management for each of the reporting entities in the Service Stream Group.

Additionally, all whistleblower reports and the investigation outcomes are reported, on an anonymous basis, to the Board. This enables the Board to understand whether the issue to which the grievance relates has been rectified, and set procedures and policies to ensure the issue is appropriately addressed and permanently resolved.

This statement was approved by the Board of directors of Service Stream Limited at a meeting of directors on 6 December 2022.

Signed,



Leigh Mackender

Managing Director

Service Stream Limited

Modern Slavery Statement

FY22

Telecommunications



4,000+
wireless sites
designed, constructed and
deployed nationally last four
years



200,000+
activations
End-user customer
activations/connections
completed nationally per
annum



20+ years
Design and construct
multi-wireless technology
infrastructure experience



500,000+
assurance
Network activities
completed per annum



4+ million
End-user customers
activated and
connected



1,750+
mobile projects
per annum



50,000+ maintenance
Network maintenance, remediation and
relocations per annum



Fixed Communications
Mobile/Wireless

Utilities & Infrastructure



500+ km
water pipeline
installed per annum



35+ million
meter reads
per annum



100,000+
gas work orders
completed
per annum



36,000+
residential solar
PV installations



500+ kW
solar PV
installations per month



55+ years
Water and gas network
experience



Operating and maintaining
20,500+ km
of gas pipelines



1.4+ million
smart meters
installed to date



200+ km
gas reticulation
mains laid per annum



Power
Water
Gas
Industrial

Transport



4,000+
ITS Devices
supplied, installed and
commissioned



12 Road Tunnels
operated and/or maintained
across Australia



34,000+
Road Lane kms
maintained on a daily basis



9,000+
Unsealed Road kms
maintained on a
daily basis



14 years in Rail Infrastructure
as Accredited Rail Operator for ARTC line
on Port River Expressway in South
Australia



30,000+ metres
Fibre Optic
and electrical cable supplied, installed
and tested



650+ Major Bridge Structures and thousands of
culverts inspected and maintained



10,000+
ITS and Electrical
devices maintained annually



Roads
Rail
ITS