



# Modern Slavery Statement

FY21



# Service Stream Limited

## Modern Slavery Statement

### FY21

31 December 2021

#### Att: Australian Border Force

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 2020 – 30 June 2021 (“**FY21 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)

**Comdain Civil Constructions Pty Ltd**  
(ABN 38 092 269 040)

**Service Stream Fixed Communications Pty Ltd**  
(ABN 94 067 943 873)

**Comdain Civil Constructions (QLD) Pty Ltd**  
(ABN 32 136 971 741)

**Service Stream Mobile Communications Pty Ltd**  
(ABN 74 095 043 057)

**Comdain Services Pty Ltd**  
(ABN 44 160 096 079)

**Service Stream Energy & Water Pty Ltd**  
(ABN 11 098 326 179)

**Comdain Gas (Aus) Pty Ltd**  
(ABN 34 099 283 271)

**Comdain Infrastructure Pty Ltd**  
(ABN 50 092 035 419)

**Comdain Corporate Pty Ltd**  
(ABN 48 140 995 946)

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 a provider of essential network services, including access, design, build, installation and maintenance. These services are provided across Australian fixed-line and wireless telecommunications networks as well as to a range of water, gas and electricity network owners and operators in Australia.

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. There are many shared suppliers across the group. All group entities follow policies and processes set by the Board.

The Service Stream Group’s consolidated revenue for the FY21 Reporting Period was in excess of AU\$100 million as reported in the **2021 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. The Managing Director, Company Secretary and the Executive Management of each entity within the Service Stream Group was consulted during preparation of this modern slavery statement. The Managing Director and Company Secretary attended each Audit & Risk Committee meeting where the content of this modern slavery statement was tabled for review.

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 2021, the Service Stream Group consisted of approximately 2200 employees and operated from more than 30 sites across Australia. Our direct employees are engaged either by contract or under award agreements. As at 30 June 2021 the Service Stream Group had approximately nine collective industrial instruments and four 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 that are not specified in this statement and are not reporting entities for the purposes of the Modern Slavery Act 2018 (Cth). Details of all Service Stream Limited subsidiaries as at 30 June 2021 are set out in the [2021 Annual Report](#).

**Service Stream Limited is an S&P/ASX 300 listed company providing integrated end-to-end asset life-cycle services to utility and telecommunication asset owners, operators, government and government-related entities throughout Australia.**





## Operations:

The principal services of the Service Stream Group's two operating segments during the FY21 Reporting Period were as follows:

### 1 Telecommunications

The Telecommunications division 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 site acquisition, engineering, customer connections, service and network assurance, design and construction of wireless and fixed-line projects, as well as minor projects for asset remediation, augmentation and relocation.

### 2 Utilities

The Utilities division 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.

The Service Stream Group did not have any international operations during the FY21 Reporting Period.

One entity in the Service Stream Group is a party to a joint venture arrangement as detailed in the **2021 Annual Report**. The principal place of business of the joint operation is in New South Wales, Australia.

## Supply Chains:

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

- A national workforce consisting of employees and more than 3000+ 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 consumables and materials to clients for incorporation into the works we perform under services and construction contracts. Some of these materials are manufactured overseas but are supplied to the Service Stream Group by distributors located in Australia. The Service Stream Group does not manufacture any materials.

## 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 two 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 prime corporate contractor (for example, a company or trust) that employs workers to perform the principal field work.

We have assessed that the most likely risk of modern slavery practices occurring within the Service Stream Group's supply chains will be within our subcontracted labour workforce, in particular those prime subcontractors who employ migrant workers with limited ability to read or write in English. This risk is not particular to the Service Stream Group but exists in any industry that relies on a manual, low-skilled migrant workforce, such as the construction, real estate, security and cleaning industries. The risk is more evident where the services occur in emerging overseas economies. The risk is less apparent in developed economies with robust workplace relations laws such as Australia, where Service Stream's operations are entirely located.





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

### Due Diligence

During the previous reporting period, the Service Stream Group conducted an extensive review of all relevant direct subcontractors and suppliers to assess whether modern slavery practices were occurring in the Service Stream Group's supply chains. During this supply chain review, the Service Stream Group:

- 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 1400 direct suppliers and prime subcontractors; and
- issued follow-up questions directly to certain respondents where we sought additional information.

During the FY21 reporting period, as committed to in our **Modern Slavery Statement for FY20**, the Service Stream Group implemented prequalification questionnaires for new subcontractors and suppliers being onboarded to Service Stream Group. The questionnaires aim to identify whether a potential subcontractor or supplier engages in employment practices that are possible indicators of modern slavery risks. Where the answers warrant further investigation, the relevant supplier or subcontractor will either be referred for further due diligence or declined from supplying to the Service Stream Group.

### 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 **2021 Sustainability Report**.

During the FY21 Reporting Period the Service Stream Group implemented new controls aimed at minimising the risk of modern slavery practices occurring in its operations and supply chains, including:

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

## How the Service Stream Group assesses the effectiveness of these actions

In the next reporting period 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 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 8 December 2021:**

Brett Gallagher, Leigh Mackender, Greg Adcock, Tom Coen, Peter Dempsey, Deborah Page AM, Elizabeth Ward.

Signed,

**Leigh Mackender**  
Managing Director  
**Service Stream Limited**





## Service Stream Limited

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