



Modern Slavery Statement

FY20



Service Stream Ltd

Modern Slavery Statement

FY20

Service Stream Ltd (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 2019 – 30 June 2020 (“**FY20 Reporting Period**”).

Reporting Entities Joint Statement

Service Stream Ltd 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 Ltd 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 FY20 Reporting Period was in excess of AU\$100 million as reported in the **2020 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 Ltd 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 were 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 Ltd) and privately incorporated wholly-owned subsidiaries. All entities are incorporated in Australia.

As at 30 June 2020, 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 2020, 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 Ltd 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 Ltd subsidiaries as at 30 June 2020 are set out in the [2020 Annual Report](#).

Service Stream Limited is an S&P/ASX 200 listed company providing integrated end-to-end asset life-cycle services to utility and telecommunication asset owners, operators and government organisations throughout Australia.





Operations:

The principal services of the Service Stream Group's four business units during the FY20 Reporting Period were as follows:

1) Fixed Communications

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

2) Network Construction

Network Construction provides a wide range of design, construction and associated services to the owners of fixed-line and wireless telecommunications networks in Australia. Service capability includes site acquisition, engineering, design and construction of wireless and fixed-line projects.

3) Energy & Water

Energy & Water provides a wide range of specialist metering, new energy and inspection services to gas, water and electricity network owners and other customers in Australia. Service capability includes meter reading and asset replacement; engineering, design and construction of energy-related products; as well as specialist inspection, auditing and compliance services.

4) Comdain Infrastructure

Comdain Infrastructure provides a wide range of operations, maintenance, design and construction services to gas and water network owners and operators in Australia. Service capability includes network assurance; asset upgrades and replacement; engineering, design and construction of network assets; as well as specialist electrical and mechanical instrumentation services.

The Service Stream Group did not have any international operations during the FY20 Reporting Period.

One entity in the Service Stream Group is a party to a joint venture arrangement as detailed in the [2020 Annual Report](#). The principal place of business of the joint operation is in NSW, Australia.

Supply Chains:

The products and services (including labour) that contribute to the Service Stream Group's principal services in its four 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 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, but 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 four business units 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 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.

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

Due diligence

In order to assess whether there are any modern slavery practices occurring within the Service Stream Group's operations and supply chains, we undertook an extensive review of all relevant direct subcontractors and suppliers to the Service Stream Group during the FY20 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 1400 direct suppliers and prime subcontractors; and
- issued follow-up questions directly to certain respondents where we sought additional information.

On conclusion of the Supply Chain Review, we had greater insight and assurance that, based on the responses, the subcontracted workforce engaged by the Service Stream Group 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 **2020 Sustainability Report**.

During the FY20 Reporting Period the Service Stream Group implemented new controls targeted at:

- increasing the transparency of the employment practices engaged in by our prime subcontractors in relation to their workers; and
- setting minimum expectations required by the Service Stream Group of its subcontractors and suppliers with respect to safe and lawful employment practices.





These controls include incorporating anti-modern slavery provisions, audit rights and reporting requirements into all Service Stream Group standard-form supplier and subcontractor agreements.

Additionally, in the FY20 Reporting Period the Service Stream Group updated its **Whistleblower Policy and Reporting Process**, and rolled out mandatory whistleblower training to its workforce. Employees can report grievances to their manager, or if they wish to remain anonymous, employees and workers can report through our independent and confidential whistleblower hotline, "Stopline". Every report is investigated and, when substantiated, appropriate action is taken.

In future reporting periods, the Service Stream Group will significantly enhance its due diligence of new subcontractors with a new prequalification questionnaire administered during the prequalification and onboarding stage. This will help us identify from the outset whether a potential subcontractor or supplier to the group engages in employment practices that are potential indicators of modern slavery risks, and if so, either be referred for further due diligence or reported to a responsible authority.

The effective implementation of these controls should minimise the risk of modern slavery practices arising from the outset.

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 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 Ltd at a meeting of directors on 09 December 2020

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

Signed,

Leigh Mackender
Managing Director
Service Stream Ltd



Service Stream fast facts

ASX200

ASX listed company since 2004



36+ million

Property visits per annum



~\$770+ million

Market cap



Access to
3,000+
Skilled contractors



2,200+

Employees



\$929.1 million

Annual revenue

Telecommunications



3,000+ wireless sites

Designed, constructed and deployed nationally last three years



2.5 million

End-user customers activated and connected



1,200+ mobile projects

per annum



750,000+ activations

End-user customer connections nationally per annum



20+ years

Design and construct multi-wireless technology infrastructure experience



450,000+ assurance

Network activities completed per annum



50,000+ maintenance

Network maintenance, remediation and relocations per annum

Utilities



500+ kilometres

Water pipeline installed per annum



35+ million

Meter reads per annum



1.4+ million

Smart meters installed to date



200+ kilometres

Gas reticulation mains laid per annum



55+ years

Water and gas network experience

36,000+

Residential solar PV installations



550+

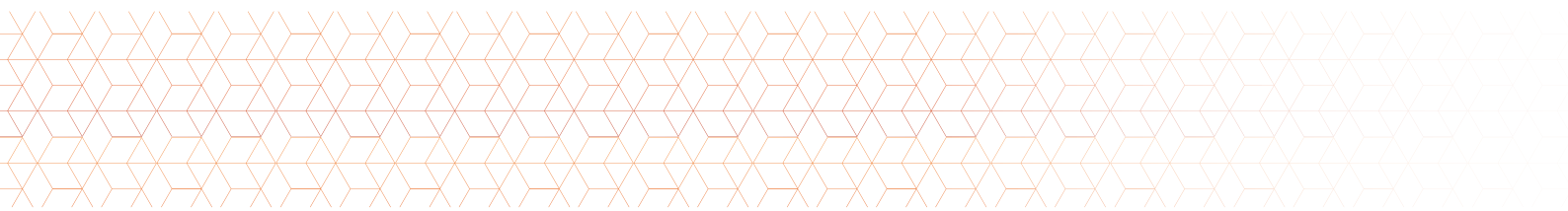
Commercial solar PV installations



Operating and maintaining

20,500+ kilometres

of gas pipelines



Service Stream Limited

ABN 46 072 369 870

Level 4, 357 Collins Street, Melbourne, Victoria 3000

www.servicestream.com.au

