



ServiceStream

Modern Slavery Statement FY23

Modern Slavery Statement

FY23

8 December 2023

Att: Australian Border Force

Service Stream Limited

Modern Slavery Statement FY23

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 2022 – 30 June 2023 (“**FY23 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 Service Stream 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.

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The Service Stream Group's principal governing body is a [Board of Directors \(Board\)](#) 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. All group entities follow the policies and processes set by the Board.

The Service Stream Group's consolidated revenue for the FY23 Reporting Period was in excess of AU\$2,150 million as reported in the [2023 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 2023, the Service Stream Group consisted of approximately 4,800 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 2023, the Service Stream Group had approximately 35 collective industrial instruments and eight 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 2023 are set out in the [2023 Annual Report](#).

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Operations

The principal services of the Service Stream Group's three operating segments during the FY23 Reporting Period were as follows:

1. Telecommunications

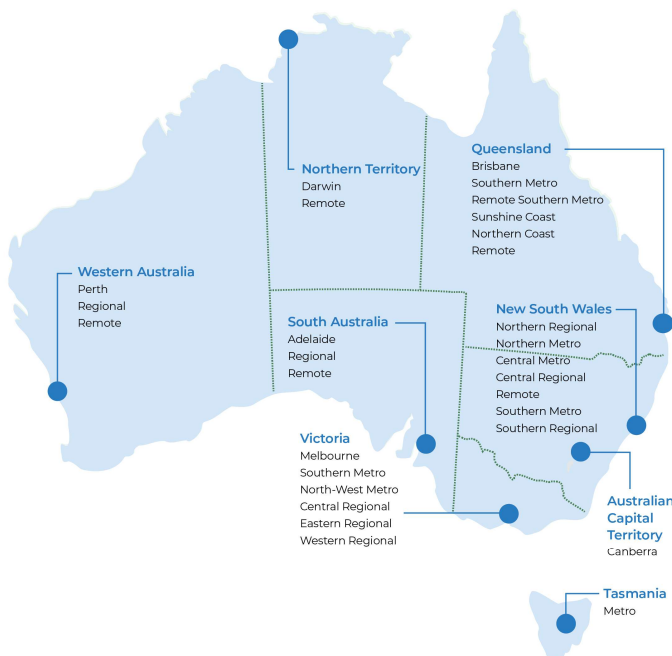
Telecommunications provides a wide range of operations, maintenance, installation, design and construction services to the owners of fixed-line and wireless telecommunication networks in Australia. Service capability includes customer connections, service and network assurance, site acquisition, design, 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, auditing and compliance, maintenance, design and 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.

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 FY23 Reporting Period.

As detailed in the [2023 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.

 An ASX listed company since 2004	 ~4,800 Employees	 80+ Locations
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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 more than 10,000+ 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.

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 FY23 Reporting Period, the Service Stream Group maintained its due diligence by completing an internal audit of the controls targeted at minimising the risk of modern slavery practices occurring in its operations and supply chains.

The internal audit results revealed that the existing controls were overall effective. The audit also identified some opportunities for improvement. This gave the Service Stream Group a greater insight and assurance that, based on the responses to the questions, 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.

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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 [2023 Sustainability Report](#).

As mentioned above, 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);
- confidential reporting of complaints through an independent and confidential whistleblower hotline, "Stopleveline";
- a targeted 'spot-check' audit of one of the Service Stream Group's largest contracts to add additional rigour around modern slavery risks in that particular project; and
- continuing to enforce onboarding processes across the group that identify and address modern slavery risks.

On 25 May 2023, the Attorney-General's Department released the outcome of the statutory review of the *Modern Slavery Act 2023* (Cth). The report makes 30 recommendations for the Commonwealth Government's consideration which, if enacted, will mark a substantial strengthening in Australia's efforts to combat modern slavery. The Service Stream Group is committed to completing further comprehensive reviews and control measures once the legislative landscape is settled (and the recommendations are enacted at law) to ensure compliance with any updated legislative requirements.

How the Service Stream Group assesses the effectiveness of these actions

During the FY23 Reporting Period, the Service Stream Group conducted an internal audit and reviewed the modern slavery controls previously implemented to determine:

- the effectiveness of the controls;
- if the controls were meeting their objectives; and
- whether more controls were needed.

The results of the internal audit for the FY23 Reporting Period demonstrated that the existing controls were overall effective and are meeting their specified objectives.

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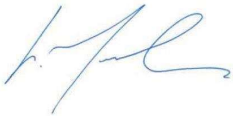
To that end, the internal auditor will report on the outcome of this review to Service Stream Group's Audit & Risk Committee, which is attended by the Board and Executive Management for each of the reporting entities in the Service Stream Group.

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.

Further, where opportunities were identified in the review to strengthen and improve the Service Stream Group's response to the risk of modern slavery in its supply chain, it will continue to implement such improvements.

This statement was approved by the Board of directors of Service Stream Limited on 6 December 2023.

Signed,



Leigh Mackender

Managing Director

Service Stream Limited

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Telecommunications

3,000+

wireless sites designed,
instructed and deployed



2.5m

end user customers
activated and
connected



1,200+

mobile sites per
annum



50,000+

maintenance, remediation and
relocations per annum



750,000+

customer activations and
connections per annum



Utilities

700kms

gas reticulation mains
and water pipeline laid
per annum



35+m

meter reads
per annum



1.4+m

smart meters
installed



100,000+

gas work orders completed
per annum



70yrs

of servicing the
electricity sector



Transport

20,500+km

of road network operated
or maintained



731

Bridges operated or
maintained since 2005

10,000+

ITS assets and traffic
signals maintained



4,000+

ITS assets designed and
constructed

66,000+

work orders completed

