

An aerial photograph showing a two-lane asphalt road that curves through a dense, green forest. To the left of the road is a large body of water with a deep blue hue. The road has a white dashed line in the center and solid white lines on the edges. A small white car is visible in the distance on the road. The forest is composed of many tall, thin trees with green foliage.


**kiwa**

# Modern Slavery ***Statement***

Kiwa Australia 1 Pty Ltd  
ACN 654 686 021  
[www.kiwa.com/au](http://www.kiwa.com/au)



# Index

- 
- |    |                                    |
|----|------------------------------------|
| 01 | Reporting entity                   |
| 02 | Core values                        |
| 03 | Code of conduct and compliance     |
| 04 | Operations                         |
| 05 | Structure                          |
| 06 | Supply chain                       |
| 07 | Governance                         |
| 08 | Supply and operation risk overview |

# Reporting entity



This modern slavery statement (**Statement**) has been published in accordance with the *Modern Slavery Act 2018 (Cth)* and is a joint statement made on behalf Kiwa Australia 1 Pty Ltd and its Australian subsidiaries:

- Kiwa Australia 2 Pty Ltd;
- Kiwa Group Pty Ltd;
- Construction Sciences Pty Ltd;
- Construction Sciences Staff Pty Ltd;
- Trilab Pty Ltd;
- PPI Australia Pty Ltd;
- BCMW Holdings Pty Ltd;
- CMW Geosciences Pty Ltd;
- CMW Geosciences (East Coast) Pty Ltd; and
- CMW Geosciences (NSW) Pty Ltd.

Together “Kiwa Australia”, each with a registered office address of 23 Kyabra Street, Newstead, Qld, 4006.

This Statement reports on the risks of modern slavery in Kiwa Australia’s operations and supply chains and the actions Kiwa Australia has taken to address those risks for the financial year ending 31 December 2024. This is the third Statement for Kiwa Australia.

## Consultation

The entities outlined above as comprising Kiwa Australia for reporting purposes, are overseen by the same Board, executive management team, legal, finance, procurement and human resource teams. Accordingly, consultation for each of those entities is largely one and the same, with some minor variations in operations.

## Approval

This Statement is made in accordance with section 14 of the Act for the financial year ended 31 December 2024 and approved by the board of directors of Kiwa Australia 1 Pty Ltd.

A handwritten signature in black ink, appearing to read "G Midgley".

Gerard Midgley  
ANZ Pacific Managing Director

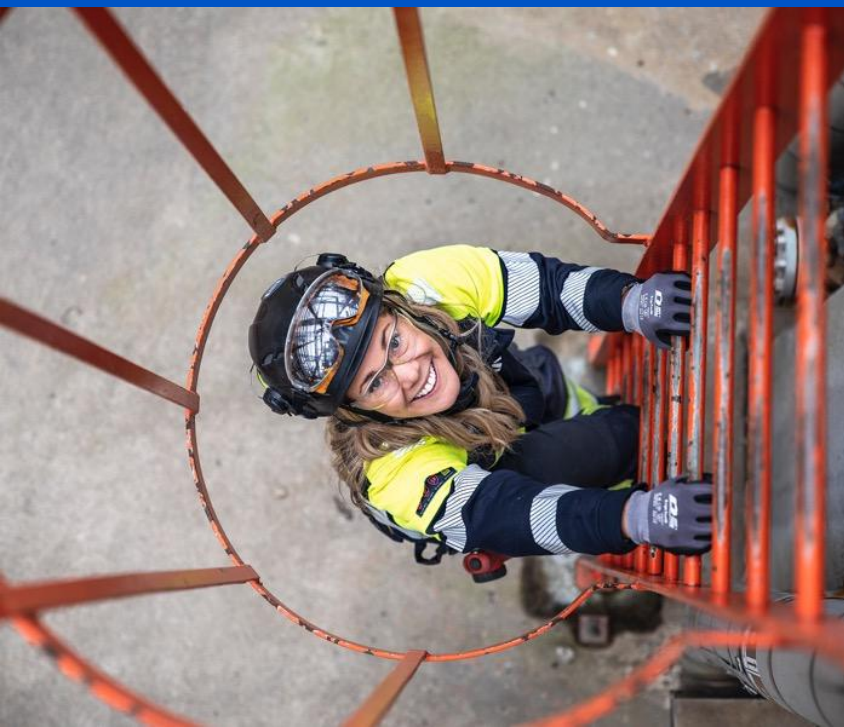


**Three  
core  
values.  
One strong  
company.**



## ***Ambitious***

We move forward with passion and curiosity, we strive for progress and improvement for ourselves, our work, our company and our service to customers.



## ***Reliable***

We do what we say, act honestly and with integrity, and we create trust by meeting and exceeding expectations.

## ***Engaged***

We positively immerse ourselves in the activities of our customers, colleagues, company, environment, and society, with a strong sense of inclusivity.

# Our **code of conduct** and compliance.

At Kiwa, we adhere and live up to high moral and ethical standards



## **Integrity**

Kiwa operates in a professional, independent, impartial and ethical manner in all its activities. This entails carrying out work honestly, tolerating no deviation from approved methods and procedures and reporting actual findings and professional opinions.



## **Conflicts of interest**

Kiwa avoids conflicts of interest with any related entity in which it has a financial or commercial interest and to which it is required to provide services.



## **Fair business conduct**

Kiwa respects standards of business ethics, competition compliance and integrity and will not do anything to bring its reputation into disrepute.



## **Anti-bribery**

Kiwa prohibits the offer, gifting or acceptance of a bribe in any form, including kickbacks on any portion of a contract payment. No improper benefits will be received or provided in doing business.



## **Confidentiality and data protection**

Kiwa respects the confidentiality and privacy of information of companies and persons doing business with Kiwa as well as of Kiwa employees and ensures processes are in place to adequately protect such information.



## **Competence**

Kiwa employees will have the right capabilities and are competent to perform their job. This is supported by regular education and training.



## **Fair labour and ethical behaviour**

Kiwa is aware of its social responsibility for its employees and the people, communities and environments in which it works. Kiwa acts with honesty and fairness while respecting human rights, equality, dignity and diversity of its employees.



## **Health and safety**

Kiwa provides a safe working environment to protect the health and safety of employees, customers and third parties.



## Operations

Kiwa Australia offers testing, inspection, certification and consultancy services (TIC) in a wide variety of markets. Through its subsidiary companies, Kiwa Australia employs over 1,000+ staff in Australia and has successfully completed more than 50,000 projects. Its clientele includes Commonwealth, State and local governments and industry leading tier 1 contractors across the infrastructure sector, construction sector and mining infrastructure sector. Kiwa Australia services include construction material testing, owners' representative services, environmental testing, geotechnical engineering, geomechanical testing and quality assurance.

**kiwa**



## Organisational structure

Kiwa Australia (formerly Intega Group Ltd) was acquired by Kiwa N.V. in 2021.

It is now a wholly owned subsidiary of Dutch company, Kiwa N.V., who is a rapidly growing TIC organisation with approximately 11,000 employees worldwide. In turn, Kiwa is part of SHV Holdings N.V., a global Dutch 100% family-owned business with 65,000 employees in 69 countries.



^ Ultimate parent company. No individual ultimate beneficiary shareholders with a direct or indirect shareholding equal or greater than 10% in SHV Holdings N.V.

## Our supply chain

Our supply chain remains relatively unchanged since the previous reporting period.

Being engaged in the construction materials testing, geotechnical and environmental engineering space within the Infrastructure industry, Kiwa Australia has a comparatively simple procurement supply chain.

Our supply chain consists of goods and services that support our TIC consultancy business and can be broadly split into two categories – those related to our project services and those that are needed for the day-to-day operations of the businesses.

The former includes the engagement of external subconsultants and subcontractors to assist and support Kiwa Australia in the services it provides for its clients.

The latter includes the purchase or hire of certain goods and services on a day-to-day basis within the business, such as the following:



Procurement of office and stationary supplies



IT infrastructure and support services



Employment and training of staff



External consultants and other advisory services when required



Leasing and/or purchase of plant and laboratory equipment



Motor vehicle leasing



Leasing of office space



Travel booking services



## Our supply chain – further details



**Procurement of office and stationary supplies:** Sourced exclusively from locally based suppliers subject to Federal and State laws. Items manufactured overseas may have complex supply chains.



**Advisory services:** All advisory and consultancy services are locally engaged and are subject to modern slavery compliance.



**IT infrastructure and support services:** Sourced domestically from a supplier. Products are manufactured by multinational companies that are subject to modern slavery compliance.



**Subcontracting entities:** Locally based entities subject to Federal and State laws. Compliance is not limited to modern slavery but to other closely related illegal and fraudulent activities. Kiwa Australia operates under a Third Party Due Diligence policy and process for engagement of subcontractors on all project work.



**Employment and training of staff:** All training services are locally based training providers and all employment is subject to Federal and State laws.



**Clients:** Federal, state and local governments and tier 1 contractors, all of which are subject to modern slavery compliance and federal and state laws. Smaller clients are local entities.



**Leasing/purchase of automotive, plant and laboratory equipment:** All plant and laboratory equipment are sourced from a domestic supplier. Whilst materials and machinery within plant and other equipment may have complex layers of supply chains, the equipment is ultimately assembled and manufactured by multinational companies that are subject to modern slavery compliance.



# Case study

## Personal Protective Equipment (PPE) & Uniforms

Kiwa Australia sources the majority of its PPE and uniforms from one first-tier supplier. The supplier operates exclusively in Australia, however the brands it supplies may produce products that contain materials from overseas. Some of the products are also likely manufactured overseas in jurisdictions with higher modern slavery risks than Australia.

The supplier is chosen due to its reported commitment to its social responsibility, including within its supply chain. The supplier is not a reporting entity under the Act and does not have readily available information about its entire supply chain. Kiwa Australia will continue to work with this supplier to obtain more information about its supply chain.





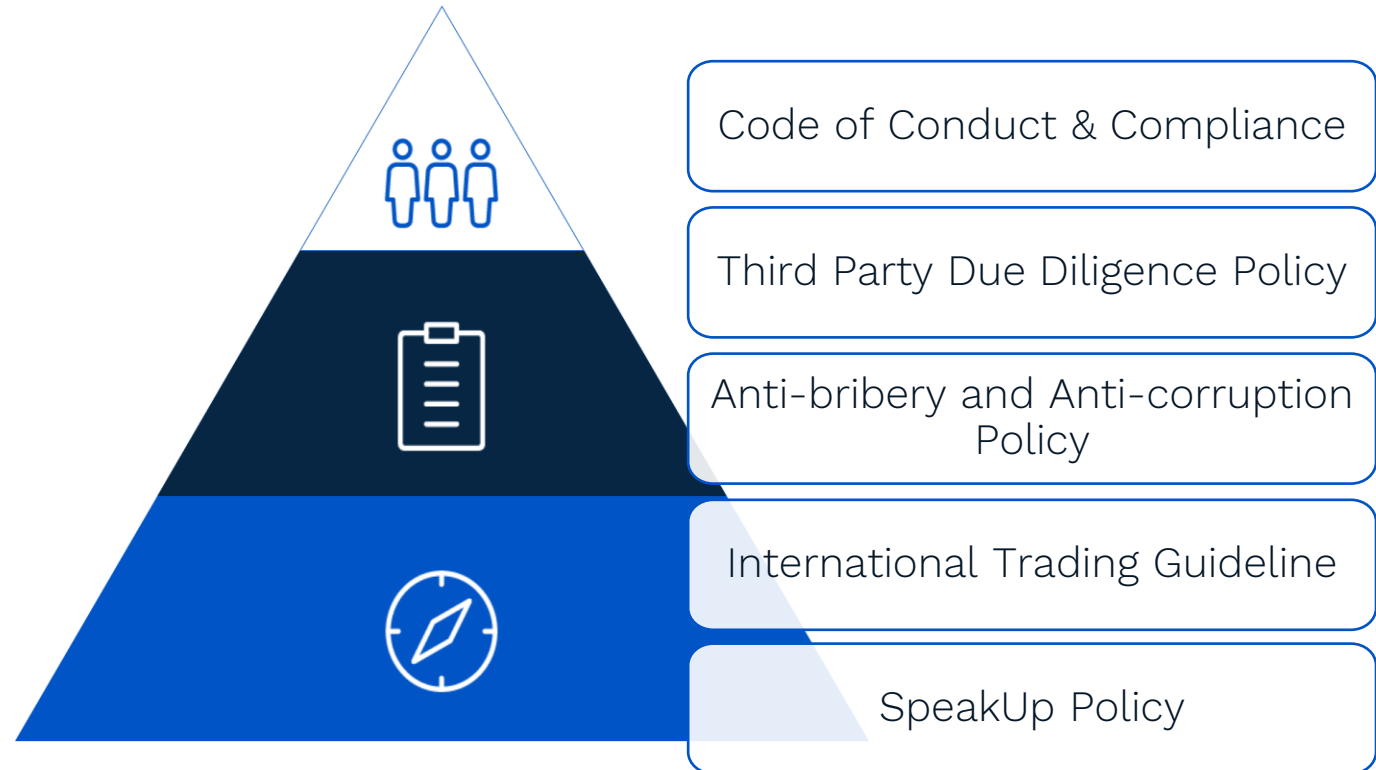
## Governance

The board of directors of Kiwa Australia has ultimate responsibility for managing the modern slavery risks of the business. From a day-to-day perspective, the executive management team in collaboration with its in-house legal, finance, procurement, human resource and operations teams work collectively to ensure a company group-wide responsibility for ongoing compliance with the Act.

## Policies

Kiwa Australia has a suite of policies which are relevant to modern slavery.

Kiwa Australia does not currently have a dedicated Modern Slavery policy or training but is committed to investigating this during the next reporting period.





Kiwa Australia believes in acting with integrity, in line with Kiwa's values and mission and in compliance with applicable laws, regulations and company policies and procedures. This commitment to integrity is supported by a 'Speak Up' culture, endorsed by the Executive Board of Kiwa. This means that if anyone feels the values, the Kiwa Code of Conduct and Compliance, policies or the law are violated, they may 'speak up' and share their concerns. SpeakUp boards/posters are displayed in every office of Kiwa Australia.

The SpeakUp mechanism is provided by Kiwa's parent entity, SHV Holdings N.V. Reports can be submitted to SpeakUp via an online for or telephone from anywhere in the world. Kiwa Australia is committed to ensuring confidentiality as an integral part of the SpeakUp process.

Kiwa Australia received zero reports regarding modern slavery grievances or allegations during the reporting period.



## Supply and operation risk overview

Whilst Kiwa Australia's procurement supply chain is relatively simple, it is committed to expecting compliant standards of corporate responsibility, legislative and regulatory compliance as well as demonstrated due diligence processes from its supply chain partners, subcontractors and clients.

Kiwa Australia recognises that this is a continuous and evolving process and it has identified subcontractors and suppliers as potential risks within the business sectors in which it operates.

Kiwa Australia has developed (and will continuously review and improve) our subcontractor prequalification process. Kiwa Australia will also continue to engage with key suppliers to get an improved understanding of supply chain risks via mapping beyond the first layer.

Consideration will be given to developing a Modern Slavery Policy and accompanying training for all employees.

Kiwa Australia has identified the need to develop and implement appropriate remediation processes for identified or reported potential breaches of modern slavery laws or company policy.



## Supply and operation risk overview

The steps Kiwa Australia undertakes and continuously strives to improve upon include:

1. Assessing (and reporting) the risks in its operations and supply chains with emphasis on high-risk geographical locations, supply chains and business transactions to ensure compliance with the Act;
2. Continuous development and the review of our Modern Slavery Statement and protocols including our Code of Conduct, Diversity and Inclusion Policy, Whistle Blower Policy, Anti-Corruption and Bribery Policy as they apply throughout our operational and supply chains, also consider a Modern Slavery Policy;
3. Continue annual compulsory Code of Conduct and Anti-Bribery and Corruption training for staff. Consider regular Modern Slavery training also for staff to compliment a Modern Slavery Policy. This training aims to educate staff on the presence of modern slavery risks in Kiwa Australia's industry sector and outlines the steps we take to mitigate modern slavery risks in our supply chains and operations. It also outlines how staff can report any discrepancies or modern slavery concerns;
4. Continuous development of onboarding and due diligence processes for supply chain partners and stakeholders, contractors and subcontractors to ensure compliance with the Act. Kiwa Australia ensures that the values of its stakeholders do not only comply with modern slavery or other legislative requirements but also that they acknowledge and operate within the parameters of its Code of Conduct and other policies;
5. Legal review of all supply partner, contractor and subcontractor contracts and agreements to ensure they contain terms that align with both Kiwa Australia's governance policies and are compliant with the requirements of the Act;
6. Creating a modern slavery monitoring process to measure and report the effectiveness of Kiwa Australia's and its supplier partners compliance with the Act. This process will continue to evolve annually with Kiwa Australia's Modern Slavery Statement.

## Supply and operation risk overview

Though Kiwa Australia considers its current measures to be effective, it is committed to continuous review to assess the effectiveness of its risk identification and mitigation strategies. Kiwa Australia will continue to screen its suppliers, contractors and subcontractors for modern slavery risks. Central to the evaluation process is regular consultation, yearly training and interaction with the companies under its control. In this reporting period, each company has contributed to and implemented Kiwa Australia's modern slavery policy and participated in the review of its systems. Included in this process was the insertion of modern slavery clauses in all external-facing contracts in the previous reporting period.

With an established, confidential reporting system in place for staff and stakeholders to voice concerns with complete anonymity, Kiwa Australia will continue to monitor any reports related to modern slavery risks. Kiwa Australia did not receive any reports related to modern slavery during this reporting period.

For future reporting periods Kiwa Australia will build upon these systems in consultation with the companies under its control and their supply partners. Kiwa Australia is committed to evaluating and recording the outcomes of these actions and to adapt as required for continuous improvement and to address any emerging risks.



creating  
trust  
*driving  
progress*