

Modern Slavery Statement

Cirro is a company within the Tonkin + Taylor (T+T) group of companies. T+T Group companies are aligned under a collective pathway and purpose.

Our Pathway sets out our purpose “together we create and sustain a better world”. This means we are dedicated to being responsible in our actions and following high ethical and social standards. One of our core values is that “Everyone matters.” We consider the impact of our operations across our value chain.

In accordance with Our Pathway and our **Code of Conduct**, the Tonkin + Taylor group of companies (“we”/“us”/“our”) is committed to conducting our business ethically, with integrity and within all applicable laws. We expect our suppliers, contractors, subcontractors, subconsultants, joint venture partners, business partners and agents (“our suppliers”) to conduct their businesses to the same high standards.

We reject any violation of people’s rights and freedoms, including modern slavery practices such as forced labour, child labour and human trafficking.

While we are not currently subject to reporting obligations under applicable modern slavery laws, this voluntary statement describes how we are applying and continue to develop an integrated risk management approach to identifying, mitigating and preventing the risk of modern slavery in our operations and supply chains.

This statement is given by Tonkin + Taylor Group Limited (“T+T Group”) for itself and on behalf of the entities owned or controlled by that company listed in Appendix A.

Our Modern Slavery Framework

T+T Group is committed to identifying, mitigating and preventing modern slavery risks in our operations and supply chain, and considering modern slavery risks as part of choosing who we work with. Our **Modern Slavery Framework** outlines our commitments, processes, and activities to support this.

Overarching commitments
Our Pathway 2025 sets out our purpose “together we create and sustain a better world”. It identifies one of key values as being “everyone matters”.
Our Code of Conduct sets out the key standards of ethical behaviour required of our people and suppliers, including compliance with applicable laws. It includes our “Speak Up” process, which promotes openness and a culture of care, courage and collaboration, where everyone feels comfortable asking questions, speaking up, and working towards solutions.
Processes and activities
Our Modern Slavery Working Group has been formed to develop and continually improve a framework to identify, assess and address modern slavery risks. The Modern Slavery Working Group was formed by our Ethics Committee, and comprises representatives from across our business.
We currently have the following processes and activities to support identifying, mitigating and preventing modern slavery risks in our operations and supply chain, and considering modern slavery risks as part of choosing who we work with.

<p><i>Our supply chain</i></p> <p>Our Procurement Policy and related processes set out our expectations of how we choose our suppliers, including the due diligence of new suppliers and working with suppliers who have values and standards which are aligned with our own.</p> <p>Supporting processes include our supplier pre-qualification questionnaire and standard form subcontracts with a requirement to comply with our Code of Conduct.</p> <p>We continually review and update our procurement processes including our approach to modern slavery.</p>	<p><i>Our own operations</i></p> <p>We comply with applicable employment laws. Our employment practices include ensuring all our employees have a written contract of employment that enshrines their rights and entitlements at law. This includes payment for all work, including interns.</p>	<p><i>The work we do with clients and partners</i></p> <p>Our purposeful decisions principles guide and support decision-making about the work we do and who we work with in a way that aligns with our values and Purpose and includes considering our full value chain.</p>
<p>Our internal audit function assesses the effectiveness of T+T Group’s management controls and reports to the Board Risk & Assurance Committee.</p>		
<p>Board Risk & Assurance Committee provide oversight of our governance, audit function, legislative compliance and risk management function on behalf of the T+T Group Board.</p>		
<p>Other supporting policies</p>		
<ul style="list-style-type: none"> • Sustainability Policy • Health, Safety and Wellbeing Policy • Diversity, Equity, Inclusion and Belonging Policy • Child Protection Policy 		

Our actions to address Modern Slavery risk

Our supply chain

We have identified the following areas in our supply chain that may present a higher risk of modern slavery:

- Goods and services sourced from a geographic region that may present a higher risk of modern slavery. such as coffee, fruit, PPE, workwear/garments, office supplies, IT consumables, building materials, plant, equipment and equipment components.
- Facilities management where certain supplier subcategories (such as cleaning services) may be subject to inappropriate labour practices.

Our own operations

Looking after our people is fundamental to the success of our business. Key activities that support our people and avoid modern slavery risks include:

- Meeting our obligations under applicable employment laws, including ensuring new employees provide appropriate identification and evidence of their right to work in the place of their employment.
- Gender Equality and Equity Guidelines and our Diversity & Inclusion policy to ensure gender equity in the remuneration of all our people.
- Certification of our occupational health and safety system to ISO 45001:2018
- Providing safe living accommodation for staff when needed for work travel, such as in hotels.
- Providing a Speak-up policy which allows employees and the wider supply chain, to raise concerns.

We focus on continual improvement of our systems and initiatives to make sure we support the wellbeing of our people and their evolving needs.

The work we do with clients and partners

We have identified the following as areas in the work we do with clients and partners that may present a higher risk of modern slavery:

- Projects involving construction activity that may be at risk of suppliers exploiting migrant workers.
- Working with joint venture or alliance partners who may have tiers within their supply chains involving labour from countries that are poorly regulated.
- Work in other jurisdictions that may have poor labour regulations and practices.
- Sectors relying on materials with associated modern slavery risk, such as renewables.

We are focusing our efforts in these areas to better understand these risks. We continue to consider risks, including of modern slavery, as part of our purposeful decisions principles and associated processes.

Ongoing improvements and assessing effectiveness

To support ongoing improvement of our processes and assess how effective our processes are, our Modern Slavery Working Group regularly:

- Monitors and reviews legislative changes relating to modern slavery
- Reviews and identifies opportunities to improve and develop controls required to consider, identify, mitigate, or prevent modern slavery risks
- Investigates any reports of modern slavery incidents or risks made to us (such as through our “Speak Up” process) and make appropriate changes
- Reports on progress and activity to the T+T Group Board’s Risk & Assurance Committee, including recommending any improvements required to the Modern Slavery Framework, and any measures needed to improve awareness and understanding of modern slavery risks
- Reviews how we addressed any incidents or risks to support improving our processes.

Our internal audit function and Board Risk and Assurance Committee also support assessment and ongoing improvements.

Consultation Process

Each entity within the T+T Group has a role to play in addressing modern slavery risks. We have consulted with the key areas of our business to prepare this statement, including with the Modern Slavery Working Group which includes representatives working across T+T Group.

Contact

Any questions or concerns can be directed to ethics@cirro.live.

Review date: June 2025

Appendix A

T+T Group entities covered by this statement

Tonkin & Taylor Group Limited	NZCN 1408101 Address: 1 Fanshawe Street, Auckland 1010, New Zealand
Tonkin & Taylor Limited	NZCN 110783 Address: 1 Fanshawe Street, Auckland 1010, New Zealand
Tonkin & Taylor International Limited	NZCN 110784 Address: 1 Fanshawe Street, Auckland 1010, New Zealand
Landcheck Limited	NZCN 313402 Address: 1 Fanshawe Street, Auckland 1010, New Zealand
Geotechnics Limited	NZCN 58403 Address: 1 Fanshawe Street, Auckland 1010, New Zealand
Geosales Limited	NZCN 1629100 Address: 1 Fanshawe Street, Auckland 1010, New Zealand
The Measurement and Calibration Centre Limited	NZCN 1961484 Address: 1 Fanshawe Street, Auckland 1010, New Zealand
Tonkin & Taylor Group Holdings Pty Limited	ACN 120 208 540 Address: 99 Coventry Street, Southbank, VIC 3006, Australia
Tonkin & Taylor Pty Limited	ACN 143 026 340 Address: 99 Coventry Street, Southbank, VIC 3006, Australia
Tonkin & Taylor Environmental Pty Limited	ACN 150 704 064 Address: 99 Coventry Street, Southbank, VIC 3006, Australia
Chadwick Geotechnics Pty Limited	ACN 143 009 330 Address: 25 Metcalf Street, Dandenong South, VIC 3175, Australia
Tonkin & Taylor (M) Sdn Bhd	MCN 107342-H Address: No. 27, 1st Floor Jalan Tun HS Lee 50000 Kuala Lumpur, Malaysia