



## Background

Broadspectrum Pty Ltd (Broadspectrum or the Company) is a wholly-owned subsidiary of Ferrovial S.A. (Ferrovial). Consistent with Ferrovial's principles of conduct and behaviour, Broadspectrum is committed to responsible corporate governance and corporate social responsibility. Accordingly, the Broadspectrum board of directors (the Board) and senior management have endorsed this Human Rights Statement to support the Broadspectrum Code of Business Conduct and compliance and governance framework.

## Purpose of this statement

The purpose of this Statement is to outline Broadspectrum's respect for human rights and how it aspires to uphold human rights in the course of operating its business.

This Human Rights Statement will evolve over time in response to business and operational developments, input from stakeholders, changes in law and regulation including human rights best practice guidance, risk assessments and due diligence. Broadspectrum also aspires to develop and improve its existing policies and procedures to ensure the implementation of human rights in the Company's business practices is optimised.

This Statement is Broadspectrum's global standard on its approach to human rights and is supported by the Code of Business Conduct, other policies and procedures, and training programs. In addition the Statement is communicated to the Broadspectrum Group with endorsement from the Board of Directors.

Broadspectrum's training programs are continuously reviewed to ensure the values and conduct principles in the Code of Business Conduct are integrated in its global business functions and procedures. Training for its employees is conducted as part of the induction process and annually. In addition, targeted training is conducted to address emerging issues observed in the business, the market and in response to legal developments.

## Scope

This Statement extends to all Broadspectrum:

- ▶ Employees
- ▶ where applicable, Business Partners, and
- ▶ wholly and majority-owned business ventures in all countries in which Broadspectrum conducts business. Where Broadspectrum has a minority interest, it will seek to ensure that the legislative requirements and intentions underlying this Policy are complied with, but recognises that the manner in which these requirements are met may vary. References in this Policy to Broadspectrum includes its related entities.

For the purposes of this statement, **Business Partners** includes, clients, suppliers, consultants, contractors, sub-contractors, joint-venture and alliance partners, and other Representatives and third-parties performing services for, or on behalf of, Broadspectrum.

## Source Documents

The source documents behind this Statement are:

- ▶ United Nations Universal Declaration of Human Rights 1948 and the International Bill of Human Rights
- ▶ 10 Principles of the United Nations Global Compact
- ▶ United Nations Guiding Principles on Business and Human Rights, and
- ▶ International Labor Organisation Declaration on Fundamental Principles and Rights at Work All of these together, referred to as the International Human Rights Standards.

## Commitment to respect human rights

Human rights are fundamental rights, freedoms and standards of treatment to which people are entitled. While sovereign states have the primary duty to protect and uphold human rights, Broadspectrum recognises that where possible and within their sphere of influence, companies should strive to respect human rights by seeking to avoid infringements arising from the conduct of business activities.

Broadspectrum is committed to respecting human rights in its operations even though none of the International Human Rights Standards are binding on or enforceable against it. Instead, Broadspectrum uses the International Human Rights Standards as a framework to guide its decision-making and constructive engagement within its sphere of influence, while respecting the responsibility of government to ensure the protection of human rights.

In that sense, Broadspectrum recognises its own limitations and ability to influence change when it comes to government policy and other matters outside its control. Broadspectrum focuses its efforts on those areas which are within its own direct influence.

## Integrating Human Rights in business practices

As above, Broadspectrum recognises the importance of upholding and respecting human rights in the course of operating its business, noting this commitment is limited to what is within its reasonable capability and requirements of law and government policy.

Broadspectrum will seek to take reasonable steps to identify, prevent and mitigate any adverse human rights impacts caused by its operations and also impacts linked to its operations through its business partners. As a result, the Company aspires to integrate human rights commitments in its business practices as follows:

### **(a) Health and Safety**

Broadspectrum is committed to protecting the health, safety and well-being of all persons involved in and impacted by the conduct of its business. This is demonstrated through the Company's global management practices, policies and procedures including the Mandatory Safety Rules and a Health Safety and Environment Management System.



## **(b) Workplace Culture**

Broadspectrum is committed to encouraging a workplace culture that respects human rights, by monitoring and taking appropriate action when concerns are raised or identified. In this regard, Broadspectrum is committed to:

- ▶ Ensuring the Company does not inadvertently or otherwise support child, forced or inhumane labour: this is demonstrated through its procurement strategy and agreements with suppliers and Employees.
- ▶ Respecting the human rights of its Employees: Broadspectrum respects the human rights of its Employees through its company values, the Code of Business Conduct, policies and training programs. The Company's global Equality and Diversity in the Workplace Policy seeks to apply relevant aspects of the International Human Rights Declarations and ensure employee training programs promote awareness of and respect for human rights in the workplace and local communities directly impacted by Broadspectrum' activities.
- ▶ Treating Employees with fairness and dignity: the Company will not tolerate any form of discrimination, harassment, bullying, exploitation, abuse or violence of its Employees or other people in the workplace. The Company is an equal opportunity employer, providing employment opportunities to people irrespective of gender or race and people with disabilities and other personal attributes.
- ▶ Respecting privacy and the confidential nature of personal information: the Company's Privacy Policy and associated processes demonstrate its commitment to protecting personal information held by the Company as required by applicable laws.
- ▶ Competitive and commensurate remuneration: payment of competitive and commensurate remuneration for its Employees using local market assessments.
- ▶ Encouraging Employees to raise concerns: providing a safe environment for Employees to report issues of concern (including via a Whistleblower and Integrity Hotline should they wish to do so confidentially) and encouraging them to do so.

## **(c) Environment**

Wherever possible, Broadspectrum seeks to engage in sustainable business practices with minimal impact on the environment and surrounding communities. This is demonstrated through the Company's accredited Environmental Management System, global policies and procedures and Business Improvement Plans for implementing sustainability initiatives. Broadspectrum considers the sustainability programs of suppliers as part of its selection process.



## **(d) Procurement and Supply Arrangements**

Broadspectrum's procurement strategy requires the business to select suppliers who have a compatible approach to human rights when procuring goods and services throughout the supply chain. Suppliers are bound to comply with specific procurement requirements which include:

- ▶ abiding by applicable laws and regulations
- ▶ complying with Broadspectrum Code of Business Conduct
- ▶ allowing Broadspectrum to verify compliance and to take appropriate steps if a human rights risk is identified, and
- ▶ allowing Broadspectrum to terminate the arrangement if the supplier fails to comply with the procurement requirements.

## **(e) Performance and subcontracting of services**

To the extent Broadspectrum provides and procures services, including security services for its clients, this will be done having regard to human rights. This will be done by:

- ▶ Considering best practice in implementing human rights guidelines: the Company conducts due diligence against relevant human rights guidelines and best practices to ensure the Company's services are conducted having regard to appropriate standards.
- ▶ Developing appropriate processes to identify and prevent human rights violations and to investigate and report alleged human rights violations: Broadspectrum, through engagement with stakeholders and its general due diligence and risk assessments, seeks to identify potential human rights risks and take action, to the extent it reasonably can, to prevent or mitigate such risks. Broadspectrum has processes for the investigation and administration of any complaints, disputes and grievances.
- ▶ Balancing the need for safety while respecting human rights: The Company requires that security personnel take all reasonable steps to avoid the use of force, and if force is used, it shall be in a manner consistent with applicable law. In no case shall the use of force exceed what is strictly necessary, and should be proportionate to the threat and appropriate to the situation.
- ▶ Providing Code of Business Conduct training: to educate and inform Employees and contractors on principles and practices necessary to promote compliance with legal and ethical standards globally.

## **(f) Local communities**

Broadspectrum supports respect for human rights through community engagement in accordance with the Company's Community Engagement Programs. This includes looking to understand established cultures, customs and values of people affected by its business activities through inclusive and open dialogue.

## **(g) Business Partners**

Broadspectrum encourages respect for human rights through proactive engagement, monitoring and contractual provisions with its Business Partners as defined under the Broadspectrum Business Partners Policy.

## Reporting human rights violations

Broadspectrum encourages its Employees, suppliers and subcontractors to report any suspected human rights violations and seeks to provide them with a safe and supportive environment in which to make such a report. Broadspectrum takes allegations of human rights breaches seriously and all reported information will be:

- ▶ investigated in accordance with Broadspectrum Internal Investigations Procedure, or when appropriate, by an independent investigator, and
- ▶ treated in confidence and in accordance with Broadspectrum's Whistleblower Policy.

Reporting of any human rights issues can be made to:

### **(a) Group Executive Legal and Governance**

Level 10, 111 Pacific Highway North Sydney NSW 2060

**Phone:** +61 2 9464 1622 or +61 2 9464 1724

### **(b) The Compliance team**

Via email: [codeofconduct@broadspectrum.com](mailto:codeofconduct@broadspectrum.com)

### **(c) Whistleblower and Integrity Hotline**

**Via email:** [broadspectrum@stopline.com.au](mailto:broadspectrum@stopline.com.au)

**Online disclosure:** <http://broadspectrum.stoplinereport.com>

**By post:** C/O StopLine Locked Bag 8 Hawthorn, Vic Australia 3122

**International:** +61 3 9811 3280

**Australia:** 1800 819 877 (toll free)

These methods are in addition to processes and procedures developed at site level.

## Review of this statement

The Group Executive Legal and Governance is responsible for keeping this Statement up to date, a formal review will take place every two years and the Board is responsible for approving this Statement.

## Related documents

This Statement should be read in conjunction with Broadspectrum's other documents including:

- ▶ *Code of Business Conduct*
- ▶ *Anti-Bribery and Corruption Policy*
- ▶ *Business Partners policy*
- ▶ *Equality and Diversity in the Workplace Policy*
- ▶ *Group Procurement Policy*
- ▶ *Health, Safety and Environment Policy*
- ▶ *Indigenous Relations Policy*
- ▶ *Privacy Policy*
- ▶ *Internal Investigations Policy, and*
- ▶ *Whistleblower Policy.*