



HEALTH, SAFETY, ENVIRONMENT & QUALITY POLICY

Red Earth Engineering is committed to protecting the environment, eliminating work related injury and illness of all personnel (our employees and subcontractors), whilst consistently working toward exceeding our customers' expectations.

This commitment is supported by our values of fairness, honesty, integrity, respect, teamwork, as well as our passion for excellence and building relationships with our customers and other stakeholders.

OUR GUIDING PRINCIPLES ARE:

- Collaboration between all personnel and customers to eliminate or minimise hazards by proactively managing health, safety, environment and quality (HSEQ) related risks
- Establish HSEQ objectives and targets that drive continual improvement in our performance
- Deliver on our HSEQ responsibilities and ensure all personnel are equipped and trained toward achieving zero harm
- Ensure sustainable performance through long term, mutually beneficial relationships with our personnel, customers and other stakeholders.

HOW THE OBJECTIVES WILL BE ACHIEVED:

- Holding all personnel accountable for implementation of HSEQ requirements
- Ensuring all personnel understand their role and visibly demonstrate commitment to our objectives and targets
- Complying with all applicable HSEQ legal and other requirements
- Continually improving and maintaining our HSEQ management system
- Reviewing and monitoring our progress, and taking action on non-conformance
- Commitment to consultation and engagement with our personnel on HSEQ related matters.

Red Earth Engineering shall provide the time and resources necessary to implement this policy and shall work toward the continual improvement of our HSEQ performance.

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Symon Jackson
Managing Director

A blue ink signature of Attila Marta, written in a cursive style.

Attila Marta
Director

A blue ink signature of Wade Ludlow, written in a cursive style.

Wade Ludlow
Director

A blue ink signature of Eddie Baker, written in a cursive style.

Eddie Baker
Director



EMPLOYEE CODE OF CONDUCT POLICY

The Red Earth Engineering Employee Code of Conduct Policy applies to all employees and outlines our expectations regarding employees' behavior towards their colleagues, client representatives or other stakeholders they come in contact with while representing our company.

Red Earth Engineering employees are ambassadors of our business. Whilst on company business our employees must conduct themselves in a professional manner and do nothing to negatively impact the reputation of our company. We promote freedom of expression and open communication, but we expect all employees to foster a well-organised, respectful and collaborative environment.

Our Employee Code of Conduct Policy supports our values of fairness and honesty, integrity, respect and teamwork.

POLICY ELEMENTS:

-) Act and maintain a high standard of integrity and professionalism;
-) Be considerate and respectful of the environment and others;
-) Consider personal appearance in the workplace;
-) Exercise fairness, equality, courtesy, consideration and sensitivity in dealing with other employees, clients, suppliers and any other stakeholders;
-) Be responsible and honorable in the use of company information, funds, equipment and facilities;
-) Promote the interests of our business;
-) Perform duties with skill, honesty, care and diligence;
-) Avoid conflict of interests, and promptly disclosing to senior management any interest which may constitute a conflict of interest;
-) Under no circumstances may employees offer or accept money; and
-) Abide by policies, procedures and inductions that relate to your employment with Red Earth Engineering and work for our clients.

Any employee in breach of this policy may be subject to disciplinary action, including termination.

Should an employee have doubts about any aspect of the Code of Conduct, they must seek clarification from one of the undersigned Directors.

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Symon Jackson
Managing Director

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Attila Marta
Director

A handwritten signature in blue ink that reads "W. Ludlow".

Wade Ludlow
Director

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Eddie Baker
Director



INDUSTRIAL RELATIONS POLICY

POLICY STATEMENT

It is the policy of Red Earth Engineering to operate our business in a manner that provides and preserves a harmonious place of work for all employees within the bounds of the Fair Work Act 2009, with management focusing on providing a quality service to clients with the assistance of a positive and agreeable workforce.

HOW THE OBJECTIVES WILL BE ACHIEVED:

Red Earth Engineering consider that the good management of industrial relations is an important aspect of our business. To achieve this, we will:

-) Comply with all applicable industrial laws, regulations, statutory obligations, award, agreements and National and State codes of practice and guidelines
-) Provide an 'open door' policy where employees can discuss issues with senior company management within a reasonable timeframe
-) Recruit employees who are aligned with company values of quality workmanship, a healthy work ethic and a positive attitude
-) Provide the tools and equipment required to conduct safe and effective work within an employee's role
-) Deliver a quality service to Clients while providing a safe and productive workplace

RESPONSIBILITIES:

Management will

-) Discuss and resolve in a timely manner any industrial concerns raised by individuals or groups
-) Encourage open and honest communications at all times in industrial relations matters
-) Be reasonable and practical in the resolution of industrial concerns

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Eddie Baker
Director



VEHICLE MANAGEMENT POLICY

Red Earth Engineering (REE) owns and hires numerous vehicles to be used for conducting its business. These vehicles are available to any REE personnel (including subcontractors and casual staff) who require them provided they have been approved to do so by a director.

TRAINING AND LICENSES

All personnel driving REE vehicles will have the minimum required drivers license, issued in Australia, for the type of vehicle they are driving. The driver will comply with all restrictions (i.e. automatics only) on their license. Please advise your Project Manager if you have any restrictions on your license so that they can arrange a suitable vehicle.

REE may require additional driver training and this will be managed via the overall REE Training Competency Register (REE-REG-03), this may include defensive driving, off-road driver or similar. Where required, the driver will undertake additional driver training, as required by clients.

VEHICLE USE

The REE vehicles are to be used for Company purposes only, allowing for taking vehicles home before and after site work to aid in mobilisation. Incidental personal use during these times is acceptable.

REE owned vehicles will be booked by reserving them on the REE Staff Calendar. If hire vehicles are required a minimum 1-week notice is required for REE administration to book a vehicle for use.

IVMS AND ROAD RULES

The Driver will comply with all relevant national, state and local road rules and regulations. The Driver will be fully responsible for all infringements including fines and demerit points.

Some company and hire vehicles are fitted with In Vehicle Monitoring System (IVMS) and these are required on some projects by our clients. The systems are active at all times the vehicle is on, irrespective of being logged in or not. The driver is responsible for understanding the IVMS settings and ensuring they meet these requirements. Failure to do so may result in removal from a project or disciplinary actions, at the discretion of the directors.

When using company vehicles, the Driver will log in to the IVMS before driving commences. If a login is required, please see REE administration. IVMS data, irrespective of client requirements, may be used by REE at any time to monitor the location and driving behavior of an employee. By driving a company or hire vehicle for REE, the driver acknowledges this may occur.

DRIVING

Prior to driving the Driver will:

- Ensure they comply with this policy
- Undertake a pre-start check including:
 - Ensuring all safety equipment is in the vehicle
 - Ensuring the vehicle is roadworthy
 - Confirming the vehicle is clean and tidy and has the min level of fuel required

All vehicles will be driven in a safe manor, complying with all road rules and regulations. Drivers will ensure they drive to conditions at all times. The driver will make themselves aware of any specific client or project requirements for the vehicle or driving and ensure they meet these requirements. If additional items are required by the client or to comply with road rules, the driver will provide suitable advance warning to REE administration to ensure they can be purchased and fitted in time.

For extended or remote trips, Drivers will develop a Journey Management Plan (JMP) which will include the following:

- 15 minutes break after 2 hours of driving or change of driver
- Call in points and details of the contact
- Procedures for failure to call in, and next of kin contacts
- Identify project and location specific risks and appropriate control measures

Where possible hire vehicles will be fitted with magnetic REE signs.

VEHICLE CARE, CLEANING AND RETURN OF VEHICLES

The driver is responsible for maintaining the vehicle in a clean, safe and serviceable condition at all times. The driver will ensure vehicle maintenance requirements are maintained, liaising with REE administration as required.

REE and hire vehicles will be maintained onsite in safe and serviceable manner by the driver. When on longer term hire, they will be washed at least on a weekly basis (or greater in dirty or muddy conditions), this will include underbody washing to ensure the risk of weed seeds being spread is reduced. When used on rotation basis, the vehicles will be handed to the next rotation clean both inside and outside.

When the vehicle is to be returned, it shall be with the following:

- Minimum of 7/8th a tank of fuel (i.e. refuelled within 100km of being returned)
- Cleaned inside and out
- REE administration to be notified of all damage or service items



Symon Jackson
Managing Director



Attila Marta
Director



Wade Ludlow
Director



Eddie Baker
Director



MODERN SLAVERY & HUMAN RIGHTS STATEMENT FY2020

Red Earth Engineering is voluntarily publishing this Modern Slavery and Human Rights Statement for FY2020 to demonstrate that we are committed to preventing the occurrence of modern slavery and human rights abuses directly within our business and indirectly through our supply chain and clients.

Red Earth Engineering is not subject to the requirements of the Australian Modern Slavery Act 2018 (Cth), but has chosen to develop a Modern Slavery and Human Rights Statement as many of our clients are required to make such a statement and our commitment to prevent these practices strongly aligns with one of our values: 'respect'. We strongly believe in respecting and upholding the human rights of all people.

This is a voluntary statement and we have chosen not to register it formally with the Australian Border Force, but rather make it available on our website.

About our business

Red Earth Engineering is a civil engineering company that is based in Australia and conducts design and engineering work for our clients whose projects are mainly based within Australia. Occasionally, we also conduct work in other countries and in FY2020 this included South Africa and the United Arab Emirates.

Red Earth Engineering employs up to 35 people including four Directors. All of our employees are based in Australia with the majority based in either our Brisbane or Perth offices. As a result, we consider our direct employees to be at very low risk of modern slavery or human rights abuses.

At times, our work does require us to engage sub-consultants and contractors and/or purchase goods and materials which in turn present a greater risk of indirect exposure to modern slavery or human rights abuses.

Policies and procedures

Red Earth Engineering presently has up to 35 employees who work closely with the Directors of the business, allowing them to monitor working practices that employees are exposed to, both internally and whilst working for our clients on their projects.

Our policies or documents that are most applicable to modern slavery or human rights are:

-) Code of Conduct
-) Health, Safety, Environment and Quality Policy
-) Industrial Relations Policy
-) Supplier Management Procedures

Risk management

As an engineering services organisation with a relatively small professional workforce, REE considers the risk of modern slavery or human rights abuses within its direct business to be extremely low. However,

REE acknowledges that it can be indirectly exposed to the risk of modern slavery and human rights abuses through our clients and our supply chain.

To better understand the potential risks within our supply chain and in the countries in which we operate, we currently rely on external publications such as the Global Slavery Index (www.globalslaveryindex.org) to guide our risk based approach. Two key indicators of the Global Slavery Index are the 'Prevalence Estimate' which calculates the estimated proportion of the population living in modern slavery per 1,000 people and the 'Vulnerability to Modern Slavery'. The table below summarises these indicators for the countries where Red Earth Engineering conducted projects during FY2020.

Country	GSI Prevalence Estimate* (per 1,000 people)	Vulnerability to Modern Slavery* (out of 100)
South Africa	2.80	53.76
United Arab Emirates (UAE)	1.67	26.80
Australia	0.65	4.27

* Further information about the Global Slavery Index and how it calculates the 'Prevalence Estimate' and 'Vulnerability to Modern Slavery' indicators can be found at www.globalslaveryindex.org

None of the countries in which REE conducted work in during FY2020 were ranked by the Global Slavery Index at the highest level of its prevalence estimate scale. The country in which Red Earth Engineering conducted work which has the highest prevalence estimate is South Africa, which also has the highest rating in respect of the vulnerability to modern slavery indicator. While countries such as South Africa and the UAE currently account for a relatively minor portion of our overall work in hand, Red Earth Engineering is committed to preventing the occurrence of modern slavery and human rights abuses across our supply chain and the clients who we work with.

Supplier and client due diligence

The day to day operations of Red Earth Engineering involves engaging sub-consultants and sub-contractors to conduct services on our behalf as well as the purchase of goods and materials. Red Earth Engineering recognises that the engagement of third parties and the purchase of goods present a greater risk of indirect exposure to modern slavery or human rights abuses.

Red Earth Engineering expects that all of its sub-consultants, sub-contractors and suppliers across its supply chain will abide by the Modern Slavery Act 2018 (Cth). To minimise the risks associated with third parties in the supply chain, the Directors of the company will consider the assessment of modern slavery and human rights factors when assessing sub-consultants, sub-contractors and suppliers with emphasis on those that operate in or manufacture goods or materials in high risk geographical locations.

Similarly, when considering work from a new client, Red Earth Engineering will consider the country in which the work will be conducted and the potential for modern slavery to occur and make an assessment of modern slavery and human rights factors as part of its due diligence process for potential clients.

To date, Red Earth Engineering has not found any instances of modern slavery in its operations, supply chains or associated with our current clients.

Training and communications

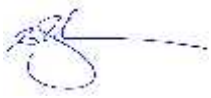
Red Earth Engineering has conducted formal training regarding modern slavery and human rights abuses for each of its Directors and key procurement personnel.

No formal training is currently conducted for other employees given the low risk to employees, but the issue of modern slavery and human rights abuses has been discussed with staff to raise awareness of the potential issues.

Actions

Red Earth Engineering will continue to review the risks associated with modern slavery and human rights abuses that may be directly or indirectly associated with our business and respond to these where necessary.

Over the next 12 months Red Earth Engineering will continue to refine our risk management, procurement and client engagement processes to improve the assessment and consideration of modern slavery and human rights factors in both the selection of our suppliers and the clients we conduct work for.

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Symon Jackson

Managing Director