



Minprovisе International Pty Ltd

## MODERN SLAVERY STATEMENT 2023

**Our Commitment to delivering a more sustainable world, free from human rights abuses**

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## **Australian Modern Slavery Act Statement**

This is our second Statement in response to the Australian Modern Slavery Act. This Statement outlines the governance processes, activities conducted and progress we have made throughout our financial year to improve our understanding and management of the risks of modern slavery and human trafficking in our operations and supply chains.

We take modern slavery and human rights abuses very seriously and are committed to continuously improving our modern slavery prevention program. This Statement was developed in consultation with our modern slavery stakeholders, and then reviewed and approved by the Sole Director Graham Townsend in their role as principal governing body of Minprovisе on 8 December 2023.



**Graham Townsend**

Company Owner / Director

December 2023

The sections of the Statement that specifically address what we have done to meet the core mandatory criteria required by the Australian Modern Slavery Act (2018) are outlined in the table below.

MODERN SLAVERY ACT 2018 AUSTRALIA	MINPROVISE 2023 STATEMENT
✓ Identify reporting entities	✓ Refer to Section 2
✓ Describe structure, operations and supply chains	<ul style="list-style-type: none"> <li>✓ Minprovisе operates through 5 business areas and in 8 market areas</li> <li>✓ Minprovisе has a mainly local base of direct and indirect suppliers</li> <li>✓ Refer to Sections 2 and 3</li> </ul>
✓ Describe risks of modern slavery in operations and supply chains	<ul style="list-style-type: none"> <li>✓ Minprovisе acknowledges the risk of modern slavery in its industry and conducts regular risk assessments</li> <li>✓ Minprovisе has not identified any modern slavery in its or its suppliers' operations</li> <li>✓ Refer to Section 4</li> </ul>
✓ Describe actions taken to assess and address such risks, including due diligence and remediation processes	<ul style="list-style-type: none"> <li>✓ Minprovisе maintains specific policies and conducts specific due diligence measures</li> <li>✓ Refer to Sections 5 and 6</li> </ul>
✓ Describe assessment of effectiveness of actions	<ul style="list-style-type: none"> <li>✓ Minprovisе regularly reviews its modern slavery approach</li> <li>✓ Refer to Section 6</li> </ul>
✓ Describe the consultation process	<ul style="list-style-type: none"> <li>✓ Various functions and executive management have been involved in the preparation of this statement</li> <li>✓ Refer to Section 7</li> </ul>
Include other information considered relevant	N/A

## **1.0 INTRODUCTION**

Minprovisе recognise that freedom from slavery is a fundamental human right and operate in compliance with fundamental labour standards. Minprovisе’s practices are consistent with the UN Guiding Principles on Human Rights and Business, and Minprovisе operates in compliance with all applicable laws prohibiting modern slavery. Minprovisе’s policies and standards, which are based on International Labour Organisation conventions, prohibit any use of forced or child labour in Minprovisе’s operations or supply chains. Additionally, Minprovisе recognises and respects employees’ right to freely associate, organise and collectively bargain, and complies with working hour requirements as established by local laws.

Minprovisе is committed to respecting and supporting the dignity, well-being and human rights of our employees and those who we engage with through our supply chain.

We seek to utilise ethical suppliers and expect their support in the identification of modern slavery risks throughout our supply chain.

Modern slavery is a term used to describe serious exploitation and undermines freedom of individuals. The purpose of this Statement is to outline Minprovisе’s commitment to mitigating risks of modern slavery within its supply chain, provide awareness of what is modern slavery and encourage stakeholders to be mindful of and report suspected acts of modern slavery.

The sections of the Statement that specifically address what we have done to meet the core mandatory criteria required by the Australian Modern Slavery Act (2018) are outlined below.

## **2.0 MANDATORY CRITERION 1: IDENTIFY REPORTING ENTITIES AND DESCRIBE THEIR STRUCTURE**

MINPROVISE was established in 2004 with a core business of reducing the risk associated with operating and maintenance of crushing equipment. With this expertise we have been able to grow our knowledge and service offerings to become the company we are today.

Though it changes, Minprovisе typically has a workforce of 600+ employees. Detailed information on Minprovisе is available at [www.minprovisе.com.au](http://www.minprovisе.com.au).

Minprovisе operates primarily in Australia and operates in accordance with Minprovisе applicable values, policies and operating procedures.

## **3.0 MANDATORY CRITERION 2: DESCRIBE THE REPORTING ENTITIES’ OPERATIONS AND SUPPLY CHAINS**

### **3.1 Minprovisе’s Operations**

MINPROVISE was established in 2004 with a core business of reducing the risk associated with operating and maintenance of crushing equipment. With this expertise we have been able to grow our knowledge and service offerings to become the company we are today.

We have an excellent reputation amongst our clients for outstanding quality, performance and safety initiatives. We believe we are one of the most capable, professional and reliable contractors in the industry.

We have undergone substantial and sustained growth to emerge as one of Australia’s leading multi-disciplinary Services, Maintenance and Specialty Equipment and Products provider and today offer innovative, integrated solutions to a diverse customer base throughout Australia and Overseas in the Mining, Oil and Gas and Construction Industries.

Minprovis operations primarily cover Australia, with offices and facilities in:

- Welshpool, Western Australia
- Karratha, Western Australia
- Port Hedland, Western Australia
- Brisbane, Queensland
- MacKay, Queensland

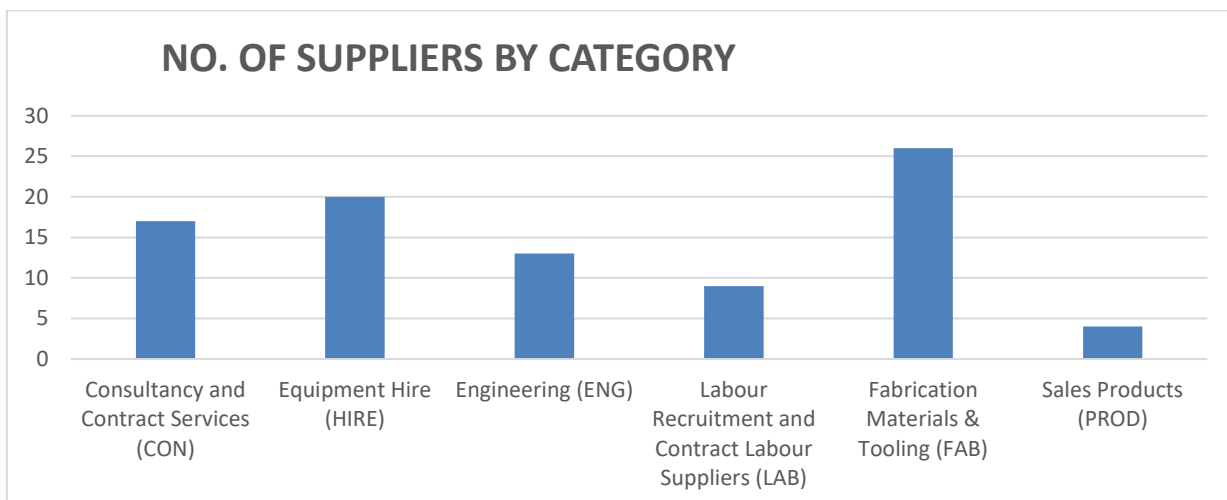
Minprovis customers are primarily large Mining multinationals operating in Australia.

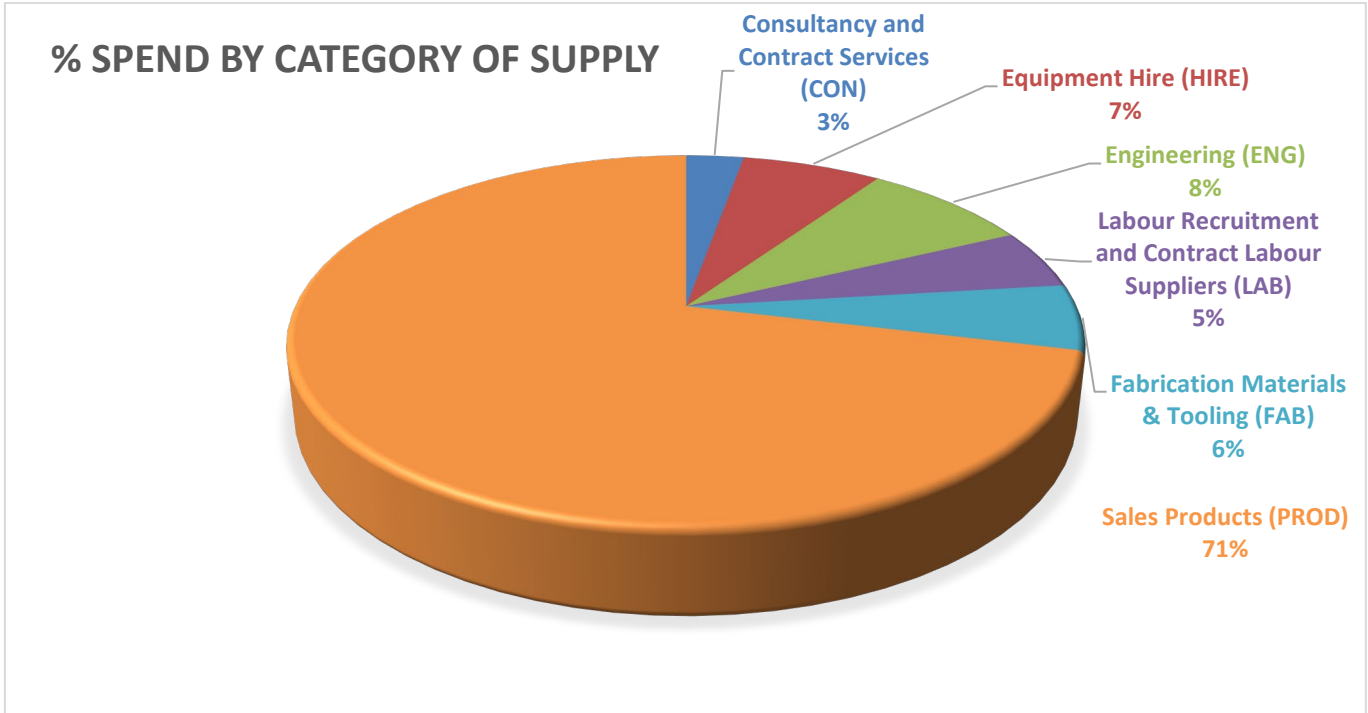
The operations comprising Minprovis share common leadership, management, policies and procedures.

### 3.2 Minprovis’s Supply Chain

In the 2022/2023 financial year, Minprovis’s supply chain consisted of almost 200 suppliers and a significant amount of its procurement spending was comprised by specialist labour hire services, engineering services, fabrication material and tooling, specialised equipment hire, sales products, among other services.

Depictions of Minprovis’s supply chain by number / percentage of suppliers to Minprovis by category of supply are presented below:





#### 4.0 MANDATORY CRITERION 3: DESCRIBING THE RISKS OF MODERN SLAVERY PRACTISES

##### 4.1 Minprovises Operations

Minprovises does not condone modern slavery in its operations. Minprovises practices conform to international standards for human rights, and it manages its operations according to fundamental labour standards. Minprovises guidelines and standards are based on the ILO Convention that prohibits all use of forced labour or child labour.

In preparing this Statement, Minprovises has performed a risk assessment on the risk of Modern Slavery in its operations. A summary of the findings is presented below:

Category	Description	Risk Rating	Controls & Mitigations
Recruitment & Employee Relations	Current Minprovises employees	Low	See section 5 of this Statement
	Engagement of new employees / contractors	Low	
Minprovises owned or controlled facilities	Minprovises offices and workshops	Low	

## 4.2 Minprovises Supply Chain

Minprovises continues to perform detailed due diligence on potential suppliers utilising the Vendor Pre-Qualification Questionnaire that has recently had a re-vamp to include a more detailed section in relation to Modern Slavery requirements. This helps to ensure that staff follow the Company processes to evaluate potential risks. As a result of these processes and the location of our suppliers, the overall risk level of Modern Slavery in our supply chains is low. The following still holds true for Minprovises:

- 1) Minprovises does not have suppliers based in countries that present a high risk of Modern Slavery.
- 2) In relation to potential high-risk categories of supply to Minprovises:
  - a) The majority of the categories of supply in Minprovises (by number of suppliers) are not in the top 5 high risk industries for imports into Australia (being, as presented by the Global Slavery Index 2023, electronics, garments, fish, rice and cocoa).
  - b) Whilst some specific scopes of supply to Minprovises may fall within the Global Slavery Index 2023s high risk category for Australian imported goods (namely PPE and other garments, phone, computers, and accessories), no Minprovises suppliers of these items are based in high risk jurisdictions.
  - c) In any event, all suppliers to Minprovises are subject to the mitigations and controls outlined in Section 5 of this Statement.

## 5.0 MANDATORY CRITERION 4: ACTIONS TAKEN BY THE REPORTING ENTITY

### 5.1 Minprovises Overview

Minprovises has existing policies and standards regulating modern slavery risk within the group's operations. These have been developed to comply with global laws prohibiting modern slavery. These are detailed below and throughout this Statement.

#### 5.1.1 Values

Minprovises conducts its business responsibly and ethically. Minprovises's values are Respect, Teamwork, People, Integrity, Communication and above all we are SAFE. These values are embedded in Minprovises's policies, code of business conduct, and safety culture. Minprovises therefore recognises and is driven to comply with international legal and ethical standards and expectations in relation to human rights and modern slavery. These are formally expressed throughout Minprovises's policies, code of business conduct, and safety culture.

#### 5.1.2 Requirements and Standards

Minprovises's practices conform to international standards for human rights, and it manages its operations according to fundamental labour standards. Minprovises's guidelines and standards are based on the ILO Convention that prohibits all use of forced labour or child labour.



The following actions have been undertaken over the last financial year:

- Minprovisе has modified our Purchase Terms and Conditions to include a clause referencing the Minprovisе Code of Conduct requirements, Modern Slavery requirements and the Bribery Act requirements.
- Minprovisе has completed a ranking of suppliers by annual spend.
- In the process of completing an audit of selected suppliers using a targeted questionnaire.

Minprovisе has several codes of conduct, policies and other documents prohibiting Modern Slavery, these are listed below:

<b>Minprovisе Document No.</b>	<b>Description</b>	<b>Document Type</b>
MINWA-COM-FRM-0003	General Conditions for Purchase of Goods and Services	Conditions
MINWA-HR-POL-0007	Minprovisе Code of Conduct	Policy
MINWA-HR-POL-0013	Modern Slavery Policy	Policy
MINWA-HR-POL-0001	Diversity Equal Opportunity Policy	Policy
MINWA-HR-POL-0010	Harmonious Workplace	Policy
MINWA-HR-POL-0005	No Discrimination Harassment and Bullying	Policy
MINWA-HR-POL-0002	Whistle Blowers Policy Statement	Policy
MINWA-HR-PLN-0001	Employee Relations Management Plan	Plan
	Human Rights and Modern Slavery Statement	Statement

### 5.1.3 Employment and Labour Rights

Minprovisе does not condone Modern Slavery in its operations. Minprovisе recognises and respects the employees’ right of association, organisation and collective bargaining, and its guidelines conform to the labour regulations stipulated by all local authorities.

Minprovisе does not employ or engage employees less than the minimum age for work in any of the regions in which we operate; and there are no junior positions in the corporate organisational structure where younger than the minimum age is a requirement.

Minprovisе prohibits discrimination in hiring, wages, equal pay, protections and conditions of employment. Minprovisе reiterates the documents outlined in section 5.1.2 above.

#### 5.1.4 Training and Awareness

As a responsible organisation Minprovisе supports and promotes human rights. Minprovisе ensures its operations do not breach international standards and conventions in line with United Nations guidelines; avoid causing or contributing to adverse human rights impacts through our activities and Minprovisе seeks to prevent adverse impacts on human rights that are directly linked to activities through its business relationships.

Minprovisе's Code of Conduct (COC) is approved by the Minprovisе Executive Leadership Team and supported by its management structure. The COC clearly communicates core principles to support Minprovisе's organisation and partners to align with UN Global Compact:

- Comply with all applicable laws and respect internationally recognised human rights everywhere Minprovisе operates;
- Follow consistent procedures to achieve a high common standard throughout Minprovisе;
- Ensure all parties Minprovisе works with share and implement the same standards of human rights;
- Always report incidents of unacceptable behaviour or deficiencies in the system;
- Uphold the right for all employees to be free to associate, organise and bargain collectively.

Minprovisе has updated their induction presentation to reflect the on-going requirements and efforts undertaken by the Company. This helps to ensure that our staff have a good awareness of Modern Slavery and Human Rights risks.

#### 5.1.5 Supplier Due Diligence

As part of the process of due diligence, Minprovisе ensures company principles are upheld along our supply chain. Minprovisе's vendor evaluation platform is based on the UN Global Compact principles, where all vendors must describe their approach to Human Rights, Labour, Environment and Anti-Corruption compliance. This includes a risk assessment of potential violations within their own supply chain. Minprovisе's management system requires all vendors and sub-contractors be evaluated prior to the placement of orders for work, services or products.

In the last 12 months we've started to re-evaluate our current Suppliers, to ensure we capture changes within our suppliers and update any requirements against the Modern Slavery requirements.

Where required, Suppliers will be required to provide Minprovisе with a Statement stating their position with regards to the Act and associated Human Trafficking and related exploitation practices, or a declaration that they will abide by Minprovisе's Code of Business Conduct. Failure to comply with this requirement may exclude the vendor.

In limited circumstances, a potential vendor that does not meet Minprovisе's approval threshold or a subsequent in-depth review can nonetheless be approved for use, but only subject to approval by the General Manager (or equivalent authorised person).

#### 5.1.6 Remediation

Minprovisе has in place a reporting framework, through which employees and contractors are able to report instances, of actual or suspected unethical or unlawful conduct, without fear of intimidation or reprisal that maintain confidentiality and protect the rights of both the reporter and the potential subject of a report.

Minprovisе is committed to fully investigating all concerns raised, and to rectifying any wrongdoing which may have occurred to the extent practicable in all circumstances, and to the principle of fairness in all investigations.

Minprovisе encourages reporting concerns immediately and within their management structure.

## **6.0 MANDATORY CRITERION 5: ASSESS THE EFFECTIVENESS OF ACTIONS TAKEN**

Minprovisе continues to undertake regular internal and external auditing of its practices and business relationships to assess adherence to our policies and regulatory compliance requirements.

Minprovisе is ISO certificated (ISO 9001:2015, ISO 14001:2015, and ISO 45001:2018) and audited annually by DNV Australia.

Audits undertaken by Minprovisе and any external audits are reviewed annually by the Executive Leadership Team through our Management Review process to ensure that our Management System is suitable, adequate, effective and align with the strategic direction of the company.

Minprovisе will continually assess the effectiveness of our actions in identifying and managing Modern Slavery risks by: tracking our actions and outcomes, partnering with suppliers and other external partners and undertaking regular internal governance and external assurance processes. Based on the results of these processes, we will adapt and strengthen our actions to continually improve our response to Modern Slavery.

No incidents or practices that could be described as causing or contributing to Modern Slavery have been reported in any Minprovisе operations for the FY 2023, and while we are aware of the risks of contributing to or being linked to Modern Slavery practices through our supply chain, we are not aware of any such incidences for the reporting period.

In the FY 2024 and beyond, Minprovisе has continued and will continue to increase collaboration with internal and external stakeholders to address the issue of Modern Slavery.

Minprovisе will strive to achieve this by raising awareness of Modern Slavery among employees and suppliers, continuing to evolve and improve our supplier due diligence and audit processes and further improve our purchase terms and conditions.

## **7.0 MANDATORY CRITERION 6: THE PROCESS OF CONSULTATION**

This Statement was reviewed by Minprovisе's Executive Commercial Manager with assistance from key Modern Slavery stakeholders within Minprovisе.

Minprovisе does not own or control any other entities and therefore this criteria is not applicable.

## **8.0 MANDATORY CRITERION 6: ANY OTHER RELEVANT INFORMATION**

Not Applicable