

# **Modern Slavery Statement**

# **For Reporting Period FY23**

Modern Slavery Act 2018 (Cth)



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# 1. Overview

MPC Kinetic Holdings Limited and its subsidiaries (together, MPK) provide a range of specialist solutions to Australia's renewables, upstream liquified natural gas, infrastructure and natural resources sectors, and maintain an active presence in the onshore and offshore oil and gas industry in New Zealand. MPK runs its business, and services its customers in accordance with the highest legal, ethical and sustainable standards. This includes identifying and preventing instances of modern slavery caused by, contributed to by, or directly linked to its business. MPK expects and requires its suppliers to share this vision.

This modern slavery statement (Statement), published pursuant to the requirements of the Modern Slavery Act 2018 (Cth) (Act), details the relevant steps undertaken by MPK during the reporting period. As permitted by the Act, MPK has elected to provide a joint Statement for and on behalf of all of its mandatory reporting entities (MREs). The steps undertaken by MPK apply as appropriate to all of its subsidiaries having material operations, assets and/or employees, whether or not they are mandatory reporting entities under the Act.

# 2. Operational Structure

MPK's business can broadly be summarised as follows:

- Energy Infrastructure, which specialises in the building of large scale, remote, developments within the liquidated natural gas (LNG), renewables, and resources sectors; and
- Energy Services, which provides a range of specialist solutions to the upstream oil and gas (predominantly LNG) industry including onshore and offshore well intervention services, fluid management services, production chemical supply and dry hire equipment in New Zealand and Australia.

#### 3. Consultation Process

This joint Statement has been prepared following engagement, consultation with, and input and analysis from board members of each MRE and each entity controlled by the relevant MRE, the company secretary of each MRE and each controlled entity, and appropriate members of MPK's corporate support services, including legal, finance, procurement and HR.

# 4. Energy Infrastructure Operations

MPK's Energy Infrastructure business provides a range of specialist design and construction infrastructure development services to the LNG, renewables and resources sectors. Its LNG services includes:

- installation of gathering networks with small diameter pipeline used for extracting and transporting LNG and water;
- connection of CSG wellheads to gas and water systems;
- construction of trunklines;
- installation of pipelines and cabling (high-voltage and fibre optic);
- installation of permanent structures, such as well pads and separators; and
- provision of a comprehensive range of wellsite services to allow efficient, safe and costeffective completion, production, maintenance and decommissioning of LNG wells, for blue-chip oil and gas producers in Australia.

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This business also provides solutions to large infrastructure projects within the sub-sectors of water, gas and slurry pipelines. MPK has specialist knowledge in the design and construction of large diameter pipelines for transporting water, gas and mineral slurry throughout Australia.

Within the renewables sector, MPK provides balance of plant services for windfarm developments. Clients are a mixture of Australian public authorities, private resource sector clients, renewables developers and OEMs.

#### 5. Energy Services Operations

MPK's Energy Services business provides specialist services to the oil and gas sector in Australia and New Zealand. In Australia, this business provides completion and production services including:

- onshore and offshore wireline services;
- fluid management services;
- well servicing rigs;
- production chemical supply; and
- specialist dry hire equipment.

The services are provided nationwide from MPK's Roma, Toowoomba and Narangba facilities, with a focus on the East Coast Surat Basin.

MPK also provides well intervention services to the onshore and offshore markets in New Zealand. It operates from a base at New Plymouth, in the Taranaki Basin. From this base, MPK provides wireline, well testing, and completion services, in the onshore and offshore sectors, for the major oil and gas operators in New Zealand.

#### 6. Operational Risk

In the context of modern slavery, MPK's business operations are low risk in both Energy Services and Energy Infrastructure. The business operates in sectors with zero-to-limited use of unskilled, temporary, or seasonal labour, zero-to-limited use of short-term contracts and outsourcing, and zero-to-limited use of foreign or temporary workers to perform inconspicuous labour.

The business operations have limited supply requirements that would necessitate excessive working hours or labour cost savings. Children are not used in the product development or service delivery and there has been zero-to-limited labour exploitation reported within the industry by NGOs.

The businesses operate solely in Australia and New Zealand where there is low prevalence of modern slavery, labour rights, human rights, and child labour violations. Both countries have ratified international conventions relevant to modern slavery, and demonstrate strong protections for workers .

MPK is unwaveringly compliant with labour standards. MPK has robust procurement and sourcing processes, and actively ensures that its workers have good information about their workplace entitlements. The busines and the industries within which MPK operates, do not display indicators of modern slavery. There are no requirements to work excessive hours, no specific issues with underpayment or failure to pay workers, and workers are actively encouraged to identify any dangerous work practices. Finally, MPK partners with high quality customers whom MPK believes share its ethos of operating to the highest legal, ethical and sustainable standards.



# 7. Supply Chains

MPK regularly procures plant and equipment from both Australian suppliers and suppliers in overseas manufacturing hubs. The plant and equipment are purchased primarily for direct use in its operations.

MPK requires each of its suppliers to comply with MPK's modern slavery ethos, and actively takes this into consideration in making its procurement decisions. All prospective suppliers are required to meet MPK's standards, and to be compliant with its policies and procedures, before they can be considered for engagement as MPK suppliers.

MPK requires its suppliers to comply with modern slavery laws as part of their contractual obligations.

MPK also conducts periodic due diligence on existing suppliers. MPK's policy requires that any offending supplier immediately cease any modern slavery practices and take steps to prevent or mitigate any harm. MPK will terminate the business relationship if this is not possible.

MPK periodically reviews the effectiveness of its supply chain policies and procedures.

# 8. Supplier Composition

MPK's suppliers are predominantly located in Australia and other low-to-medium risk jurisdictions, including New Zealand, Singapore, France, United States of America, Chile, Italy and Thailand. MPK also procures some goods from other jurisdictions, being China, the Philippines and India.

# 9. Supplier Diligence

During the reporting period, MPK directly surveyed suppliers across all of its business units and corporate services, regarding modern slavery risks within their operations and supply chains. This included suppliers located in Australia and overseas, with a particular focus on suppliers based in or with operations in countries identified by the Global Slavery Index as having a material prevalence of modern slavery risk. MPK carefully reviewed all survey responses. In this reporting period, it was not considered necessary to make further enquiries of any particular suppliers or to request particular improvements by any suppliers to improve their due diligence in respect of modern slavery risks in their supply chains.. MPK will conduct similar due diligence on its suppliers during each reporting period.

#### **10. Assessing Effectiveness**

MPK regularly reviews the effectiveness of is modern slavery risk procedures by:

- monitoring and assessing data related to supplier responses to MPK's modern slavery due diligence investigations;
- considering modern slavery risk as part of MPK's overarching company risk management procedure;
- investigating any complaints which are referred to it about modern slavery through its whistleblower and other reporting procedures;
- reporting any issues related to modern slavery to MPK's board as part of its monthly reporting process;
- regularly reviewing our governance procedures including MPK's procurement and human resources frameworks; and
- engaging with MPK's clients and other stakeholders in relation to their approach to managing modern slavey risk.

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# 11. Concluding Remarks

MPK believes that the business has an important role to play in tackling modern slavery within the operations and supply chains, and that the busines must continuously improve its performance in this area. MPK will seek to identify opportunities for improvement within its own business. Without limiting this view, MPK is satisfied that the actions it has taken during the reporting period are commensurate with the level of modern slavery risk applicable to its business.

# **12. Approval of Joint Statement**

This joint Statement was approved for submission to the Australian Border Force and corresponding online publication, by the board of MPC Kinetic Holdings Limited, and by the respective boards of each MRE, by means of circular resolutions of the respective directors.

#### **13. Execution**

This joint Statement is signed for and on behalf of MPC Kinetic Holdings Limited and each MRE as follows:

- Adam Machon Director and CEO MPC Kinetic Holdings Limited
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- Date: 5 December 2023