

MODERN SLAVERY STATEMENT



Message from our CEO



At Contract Resources, we are committed to conducting our business with integrity and transparency. We recognize the importance of addressing modern slavery and human trafficking in our operations and supply chains. This statement outlines the steps we have taken and continue to take to ensure that modern slavery is not present in any part of our business during FY24. We are dedicated to upholding the highest standards of ethical conduct and human rights, and we expect the same from our partners and suppliers.



Michael Charles
CEO and Managing Director
9 September 2024

1 MODERN SLAVERY

Contract Resources Group Pty Ltd (ACN 637 730 511) and its controlled entities (see **Appendix A**) (together, for the purposes of this Statement, “**Contract Resources**”) is proud to present our Modern Slavery Statement for 2024.

This statement is published in accordance with the *Modern Slavery Act 2018* (Cth). It outlines the steps Contract Resources has taken to identify, assess, mitigate, and remediate modern slavery risks in our operations and supply chain from 1 July 2023 to 30 June 2024.

Contract Resources is dedicated to acting ethically and with integrity in all business dealings. We recognize our responsibility to respect human rights and strive to create an environment where every employee and business partner is treated fairly and with respect. Contract Resources is committed to implementing effective systems and controls to ensure that modern slavery does not occur within our business or supply chain.

As a leader in specialised industrial services, Contract Resources has been operating globally since the 1990s. We prioritize the health and safety of our employees, clients, and the communities in which we operate. Our ongoing success is built on valuing people, innovation, and sustainability.

We are committed to transparency in our supply chains and to developing and implementing policies and procedures that reduce the risk of modern slavery across all aspects of our operations.

2 VALUES

We are committed to ensuring the long-term sustainability of our industry, the livelihoods of our people, and the health of our planet. Our values define our identity and how we operate every single day.

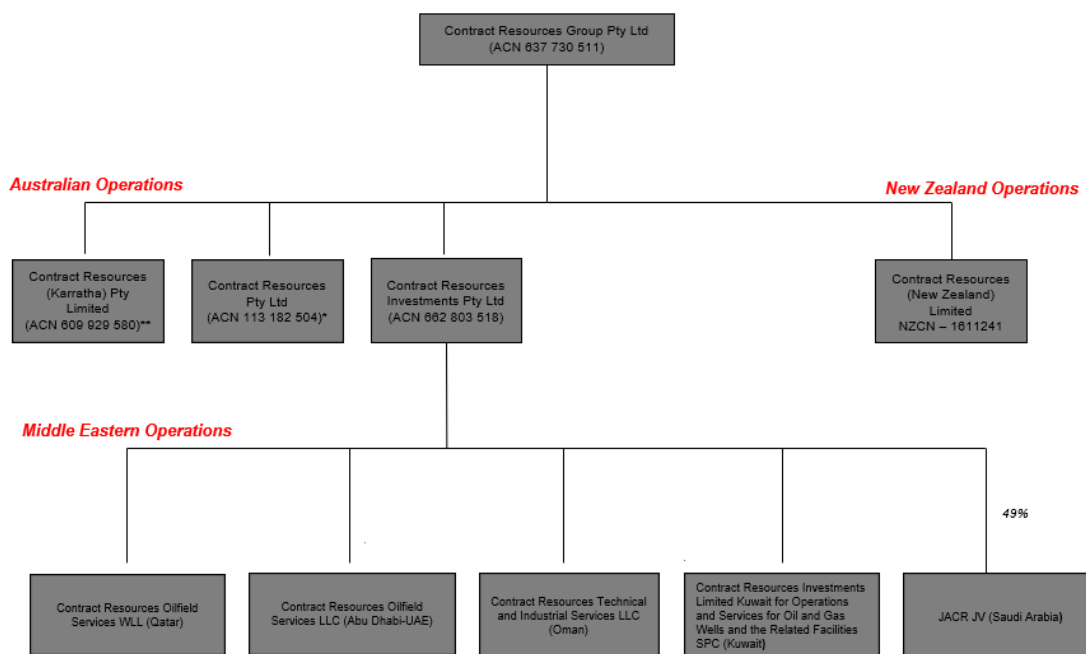
 <p>Zero Harm Care for health, safety, community and environment</p>	 <p>Delivery Changing the critical path by exceeding expectations</p>
 <p>People Our most valuable asset</p>	 <p>Quality 100% Right first time</p>
 <p>Customers Working together for continuous improvement</p>	 <p>Presentation Proud to stand out</p>
 <p>Teamwork Performance through teamwork</p>	 <p>Sustainable Commercially successful and environmentally sustainable</p>
 <p>Innovation Leading in innovative technology and performance</p>	

3 OUR STRUCTURE, OPERATIONS, AND SUPPLY CHAIN

Contract Resources is a leader in specialised industrial services with over 35 years’ experience in heavy process industries. We’re committed to deliver sustainable transitional solutions in a balanced cost-effective way. Operating in Australia, New Zealand, PNG, Egypt and the Middle East, Contract Resources has a growing global presence.

Our current corporate structure is depicted below.

Contract Resources Group Structure



Providing catalyst handling and specialised mechanical and industrial services, we are dedicated to delivering sustainable and cost-effective maintenance solutions. This commitment includes exploring and integrating new technologies in complex industrial sectors such as liquefied natural gas (LNG), refining and petrochemical, minerals processing, fertilizers, food processing (dairy), upstream oil and gas, renewable energy, including geothermal and waste treatment.

Globally, we employ between 1,400 and 2,000 people, depending on project timing. Our workforce is engaged under a mix of individual contracts and regional industrial agreements. During the reporting period, Australia and New Zealand faced labour shortages, making employee recruitment highly competitive. Consequently, we explored opportunities to recruit workers from overseas. This approach heightened the risk of potential modern slavery exploitations due to the regions from which employees were sourced. Ultimately, employees were seconded from our team in the Middle East to Australia, where they were remunerated under local Australian industrial agreements.

Our supply chain prioritises safety, reliability, and quality. We work with suppliers of plant and equipment, personal protective equipment (PPE), and raw chemicals. Many of our suppliers are highly specialized, and in some cases, there are limited alternatives. Each item is sourced from manufacturers and resellers that meet Contract Resources’ stringent standards and values.

Our current office locations are depicted below:



4 WHAT RISKS DO WE FORESEE?

We have identified potential modern slavery risks associated with both our supply chain and operations through direct engagement with third-party suppliers and indirectly through the companies that supply goods and services to our suppliers. Key risks identified include safety practices, forced or compulsory labor, accommodation facilities, withholding wages and benefits, work hours; passport confiscation, human trafficking; and bribery and corruption.

We have identified that through our global expansion there is risk associated with operating in developing nations and conflict zones, and sourcing equipment and materials from areas with minimal human rights protections, weak law enforcement, or prevalent modern slavery practices. There is also a high risk when engaging third-party suppliers in the jurisdictions (e.g., labor hire) who employ vulnerable workers with basic skills, such as migrant employees and those from low socio-economic or culturally diverse backgrounds. It has also been identified, that in developing nations, while some legal protections exist, enforcement is often weak, and workers face challenges in accessing justice.

5 WHAT CONTROLS DO WE HAVE IN PLACE?

Respecting human rights and promoting the eradication of modern slavery is embedded in our governance and management system. Policies and procedures we have in place and regularly review include:

Code of Business Conduct - establishes the minimum standard of behaviour expected of all employees including human rights.

Supplier Code of Conduct - establishes the minimum standard of behaviour expected of all contractors including human rights.

Whistle-blower Policy - prescribes how people can report concerns about unacceptable conduct in breach of our values and details protection of whistle-blowers.

Speak Up Hotline – service available to employees, contractors, and the community to report grievances and unacceptable conduct in breach of our values and contracting golden rules.

Diversity and inclusion policy - describes our commitment to diversity in the workplace and how we embrace differences in the environments we work in.

Bullying, Harassment and Discrimination procedure – prescribes our commitment to provide a workplace free from bullying, harassment, unlawful discrimination, and victimisation.

Supplier on-boarding procedure – sets the procedure for supplier approval and due diligence to identify and mitigate any actual or potential risks related to our operational activities.

Audit regime/Delegation of Authority/ Gate Meetings – governance procedures that are in place to manage approval of new supplier relationships and engagement of suppliers prior to contractual commitments.

6 HOW DO WE ASSESS OUR CONTROLS?

Contract Resources adopts the Plan, Do, Check, Act (PDCA) methodology in assessing modern slavery risks and working towards continuous improvement.



Plan: Review and assess risk of modern slavery in the business;

Do: Implement and promote policies and procedures aligned to Contract Resources values;

Check: Regular and systematic reviews of all policies and procedures including internal compliance audits;

Act: Evaluate effectiveness of policies and procedures, training etc and modify as necessary.

7 WHAT ACTIONS HAVE WE TAKEN?

During the reporting period, Contract Resources has endeavoured to further mitigate risk of modern slavery in our operations and supply chains by undertaking the following activities:

- External review of Middle East HR policies and procedures; detailed operating procedures to implement company policies, governance in recruitment and hiring practices, worker rights and protections, training and awareness, compensation and local jurisdictional governance;
- Commencement of negotiations in relation to industrial agreements in Australia through collective bargaining with employees and their union representatives;
- Continued focus on internal training and promotion of EAP services including quarterly focus group webinars;

- Initiated training program for roll out to targeted suppliers to enhance their understanding of modern slavery risks;
- Continued focus on supplier on-boarding training for employees;
- Continued audit of suppliers and compliance with modern slavery expectations;
- Continued audit of supplier management procedure with actions noted and corrected;
- Review procurement categories to identify high-risk modern slavery practices (i.e., business sector, employment practices, etc) and implement appropriate changes to supplier onboarding procedure including modification and refinement to modern slavery questionnaire (Australia);
- Promoted diversity within the team with focus on indigenous cultures including participation in NAIDOC activities, continued education and training on indigenous history and review of indigenous engagement policy (Australia),
- Promoted diversity within the team with focus on transferring and promoting ME technicians within the NZ team (NZ);
- External review of and training in NZ HR policies and procedures relating to Holiday's Act and ongoing management of employee health and wellbeing;
- Participate and sponsor local initiatives to support awareness of mental wellness and domestic violence in the construction and resources industries (NZ);
- Site visits by Senior Management to accommodation facilities in ME to verify and witness conditions;
- Continued review of IT platform with view to implement online learning management and training system including data security;
- Roll out and training of new country entry policy which includes review of legal systems, corruption rankings and safety/conflict-affected rankings;
- Review and update to the existing whistleblower hotline program (including questions and access options) available to employees and suppliers.

8 FUTURE ACTIONS

Contract Resources is committed to continuous improvement and awareness of the risks of modern slavery in our operations and supply chains. Future initiatives we propose include:

- Review and implement recommendations from external advisors of Middle East HR practices and procedures.
- Review and implement recommendation from external advisor of Australian HR practices regarding casual employment engagements.
- Review and maintain a continuous focus on worker facilities (including accommodation), ensuring that all establishments comply with local regulations, meet customer approval, and adhere to company safety procedures across all subsidiaries in Middle East.
- Continue to review IT platform for online learning management and training systems including data security;
- Review and audit supply contracts to ensure up to date human rights and modern slavery clauses are included.

9 CONSULTATION

Stakeholders from each of the entities within the Contract Resources group, as identified in this statement, have worked collaboratively to prepare this statement. Working groups have assessed and identified modern slavery risks in our business. We discussed information regarding the actions we intend to take to address these requirements.

This statement has been reviewed and approved by the Board of Directors of Contract Resource Group Pty as the global parent entity at its August Board meeting.