

Modern Slavery Statement

Reporting Entity – EnerMech Pty Ltd

Registered office & principal place of business – 931 Cockburn Road, Henderson, WA 6166, Australia

Ownership & Structure

Established in Australia as EnerMech Pty Ltd as a proprietary company, with the ultimate parent company being EnerMech Group Limited, United Kingdom.

EnerMech Pty Ltd has a few subsidiaries in Australia all of which, apart from MInteg Pty Ltd, are defunct and non-operating with no revenue, no costs, no personnel.

MInteg Pty Ltd is very small with revenues well under A\$10M per annum and hence no disclosure is being separately made for MInteg Pty Ltd however all representations below with regard to Modern Slavery Statement are a representation being made for EnerMech Pty Ltd and its subsidiaries which includes MInteg Pty Ltd.

EnerMech Pty Ltd Group of Companies in Australia financial year and tax year is calendar year based. Audited financial statements and tax return last filed was thus for year ended 31 December 2019. There were 635 employees in EnerMech Pty Ltd Group at 31 Dec 2019.

Our Operations

Our experts deliver a broad suite of services to the energy and infrastructure industries. We have a dedicated team of experienced and highly skilled specialists located throughout the world who strive to deliver the best quality services. They will only accept the highest standard of innovative solutions offering our dedicated and successful clients increased efficiencies and minimised cost.

We are renowned the world round because we listen to our customers' needs, focusing on what really matters and helping them to maximise economic recovery from their assets.

We support our customers through any asset's full life cycle, providing a range of critical services across all phases – from start to middle to end.

Our broad range of services include; mechanical, electrical and instrumentation solutions, and can be provided individually or as part of a fully integrated package.

Our experts have a vast knowledge of our equipment which means they can highlight the appropriate tools and services for your project, these include; an extensive range of cranes and lifting, hydraulics, valves, electrical and instrumentation, pipeline and umbilical, industrial, process, training, inspection, integrity and equipment rental services.

Our ability to deliver on time and with greater efficiencies is due to our forward thinking approach, utilisation of multi-disciplined crews and global experience. Our customers know they are in safe hands as our industry professionals are focussed on driving cost effective and timely solutions, delivering excellence every step of the way.

Goals & Objectives

- Providing ongoing, long term and project based support across all key stages of an asset life.
- Delivering a range of mechanical, electrical and instrumentation services to global energy and infrastructure markets.
- Optimising efficiencies and reducing costs through a combination of multi-skilled technicians and tailor-made service packages.

Services

We provide a broad range of services to support your pre-commissioning and asset support needs which can be provided as stand-alone project based work or bespoke integrated packages. Our services include:

- Industrial Services
- Process Services
- Pipeline Services
- Subsea and Umbilicals
- Electrical and Instrumentation Services
- Cranes and Lifting Services
- Hydraulic Products and Services
- Valve Supply and Manufacture
- Valve Integrity Management
- Equipment Rental

We deliver excellent customer service throughout the globe, across a wide variety of industry sectors. Our employees have a proven track record ensuring our clients have a bespoke and tailored solution, which is cost effective, efficient and on time. We utilise our significant technical depth to ensure we never compromise on service, capability or delivery, irrespective of the size of project.

The Target Market

We provide services to Refining and Petrochemicals, LNG, On and Offshore Oil and Gas, Power, Renewables, Infrastructure, Defence, Midstream and Mining markets

We provide services to our customers during the construction, operation and decommissioning phases. Our clients include Operators, Plant and Asset Owners, EPC Contractors, Subsea Contractors and Drilling Contractors.

Our customers benefit from our wide industry knowledge and broad service capability. We differentiate ourselves from our competitors not only through our ability to provide safe and innovative solutions but through our ability to work across our services and geographies. Through providing tailored packages for all aspects of mechanical handling, electrical & instrumentation services and pressure systems integrity, we have a proven track record in improving efficiencies and minimising cost for our clients.

Supply Chains

There are several materials and services that are procured by EnerMech Pty Ltd, as follows:

Commodity Description	
Accumulators and Cylinders	Advertising and Publicity
Coatings and Painting	Communications and IT Services
Consultancy Services	Container Supply or Rental
Cranes and Lifting Equipment	Electrical
Engineering, Fabrication and Machining	Equipment Rental
Fasteners and Bolting	Filtration Equipment
Forklifts	Hoses and Fittings
Hydraulics and Testing Equipment	Inspection Services
Instrumentation Supply or Rental	Logistics , Transport & Freight Services
Mechanicals - Motors, Gearboxes etc	Medical and First Aid Providers
Nitrogen Tank Rental and Gas	Office Supplies and Equipment
Oils, Gases, Chemicals and Lubricants	Operational Consumables
Pipe repair solutions and products	PPE (Personal Protective Equipment)
Property Maintenance	Pumps Supply or Rental
Raw Materials	Recruitment
Seals, Gaskets, O'Rings, Bearings etc	Security Services, CCTV etc
Signage	Steel
Storage & Management Of Company Records	Technical and Professional Services
Temporary Labour	Testing
Tooling Supply	Training Providers
Travel and Accommodation Providers	Utilities (Electricity, Gas, Water, etc)
Valves	Waste

The risk of modern slavery does exist due to us procuring materials and services from a range of suppliers/ providers across multiple commodity types. However, the risk is low to medium as majority of our supplier/ service providers are Australian or use Australia based personnel / materials. Below comprises majority of our procurement:

- Personnel hire – via labour hire agencies, almost entirely Australian
- Consultancy – largely from Australian providers using Australian work force

- Engineering, Fabrication and Machining – almost entirely performed by and in Australia.
- Equipment Rental – at least a part of the equipment we rent will be manufactured in Australia, though in part these could be manufactured overseas.
- Travel – largely within Australia and using leading and Australia based airlines like Virgin and Qantas and, infrequently used, smaller regional airlines. Though Airlines may be using plant and equipment, products/materials procured from overseas but significant part of their cost is likely to be personnel.
- Accommodation – which is largely within Australia and whilst Hotels will be using some products and materials manufactured overseas, a significant part of their supply chain is local personnel related
- Freight and logistics – again mostly within Australia
- Gasses – all manufactured locally.

But above suppliers / providers to us will surely have a part of their supply chains that may be exposed to international providers/suppliers and thus may have a higher risk of being exposed to modern slavery. Also, given the range of materials and services we procure including some from overseas, it is highly likely that some of our suppliers/ providers use products, materials and services within their supply chains that are coming from higher (modern slavery) risk countries.

Measures Taken to Assess, Address & Manage the Risk of Modern Slavery

Commitment & Policy & Modern Slavery and Human Trafficking Statement

EnerMech is committed to a zero tolerance of slavery and human trafficking, in all its different forms, in any part of its business and supply chain. Board and senior management are fully committed to managing modern slavery risk within our organisation. Please see our Modern Slavery and Human Trafficking Policy Statement attached.

Due Diligence

See attached EnerMech Supplier Assessment Form. Every supplier that is set up is required to fill in the attached and supplier responses are evaluated prior to accepting & setting them up for use. This includes a section on Code of Business Conduct including compliance with Australian anti-corruption laws, US FCPA and other applicable anti-corruption laws in jurisdictions that the suppliers do their business in. It also provides that if the supplier is a smaller business and does not have their own documented policies then they need to abide by EnerMech's supplier code of business conduct. Please also see SAF item 6.2 (Corporate Social Responsibility), SAF item 7 (Modern Slavery), SAF item 8 (compliance with Export control laws & regulations). Also see SAF item 5 (Environmental Management).

Risk Assessment

- Quantified spend – We listed all suppliers according to spend for assessment. Generally, the greater the amount of spend, the greater the risk hence larger value suppliers were especially focused upon.

- Categorised spend – Sorted suppliers (covering entire supply chain) into categories and determined if they are supplying goods or services. Not only the direct suppliers captured in procurement but making sure we included indirect suppliers that occur throughout our operations, such as transport & logistics, labour hire, IT or manufacturing/ fabrication activities.
- Risk Assessment – An assessment was done and letters sent to selected suppliers. Selection was risk based i.e. suppliers who are likely to use input materials and services in their supply chain that may be originating/ sourced from other countries which countries we are not aware of and thus we are unable to judge whether those countries are such that have a known history of human right violations. Hence we have circulated a questionnaire to a selected number of suppliers. Responses from suppliers will be evaluated over the course of the next few months and suitable action will be taken where suppliers do not respond or it is apparent that they are not managing the risk appropriately.

Engagement, Training & Specific Actions Taken

- Throughout 2017 and 2018, EnerMech worked towards putting in place the necessary requirements to enable the prevention of Modern Slavery within our Supply Chain. Although specific departments within our organisation are responsible for ensuring compliance to the Act, we appreciate that all EnerMech employees are to be held accountable for ensuring that any acts of Modern Slavery or Human Trafficking are prevented. 2019 saw EnerMech develop a Supplier Code of Business Conduct which contains provisions on the fundamental rights of workers. Please find a copy of our Supplier Code of Business Conduct attached.
- We have engaged with internal and external stakeholders including EnerMech senior management, operational leads, commercial, legal and procurement staff. A communication was issued to internal stakeholders in Australia in July 2020 advising them about Australian Government's Modern Slavery Act and Reporting Requirements. Also, attached letter was sent to identified suppliers which has a questionnaire to enable EnerMech to assess and ensure it meets its Australian Slavery Reporting Requirements.
- We perform online HSE Inductions and the Code of Business Conduct is mandatory for all staff which covers this topic. Please see attached EnerMech Code of Business Conduct:

Further Actions to be Taken

- Supplier responses to the questionnaires issued by EnerMech are pending to be evaluated.
- Revisiting the list of suppliers to increase coverage by sending questionnaire to other identified suppliers.
- Taking appropriate action where suppliers/providers have not provided us sufficient comfort that they in turn are managing the risk of modern slavery appropriately.

- Recirculating to higher (modern slavery) risk suppliers/providers EnerMech Supplier Assessment Form requiring them to fill in again to enable a full re-evaluation process.

Worst Forms of Child Labour, Forced Labour, Bonded Labour and Human Trafficking

EnerMech does not hire children under the age of 18. We obtain proof of age/identity documents from all new hires. We have a Modern Slavery and Human Trafficking Policy (attached above) that prohibits modern slavery including all forms of forced labour, bonded labour and human trafficking in its operations.

Grievance Mechanism

See attached EnerMech Employee Grievance Procedure outlining the process through which Employees and any subcontractors can raise a grievance they have witnessed or experienced by EnerMech or any of its suppliers. We also have an Australia Speaking Up Policy, please see attached.

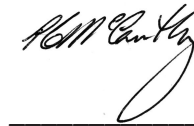
The foregoing Modern Slavery Statement for EnerMech Pty Ltd. (and all of its subsidiaries in Australia) is hereby approved on 1st of December 2020 by its principal governing body represented by all of the Directors of EnerMech Pty Ltd and its subsidiaries in Australia.



Christian Brown



Sandeep Sharma



Paul McCarthy



Jaipreet Singh

Dated: 1st December 2020