



**MMA**  
OFFSHORE

# Modern Slavery Statement

2023





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## Mandatory Criterion 1

### Identify the Reporting Entities & Describe their Structure

This Modern Slavery statement (**Statement**) is made in accordance with the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) and applies to:

- MMA Offshore Limited (ACN 083 185 693) (parent company) and its subsidiaries; and
- MMA Offshore Vessel Operations Pty Ltd (ACN 009 200 686), which is a wholly owned subsidiary of MMA Offshore Limited and independently meets the reporting threshold under the Modern Slavery Act.

This Modern Slavery Statement is the third mandatory modern slavery statement made under the Modern Slavery Act, and covers the financial year ended 30 June 2023.

MMA Offshore Limited (**MMA**) is a publicly listed company on the Australian Securities Exchange (ASX:MRM) specialising in providing high-specification vessels and a comprehensive suite of marine and subsea services to the offshore energy sector, government and defence and wider maritime industries. Detailed information on MMA is available at [www.mmaoffshore.com](http://www.mmaoffshore.com).

MMA's head office is in Perth, Western Australia. MMA's corporate structure includes subsidiaries incorporated in Australia, Singapore, Malaysia, Papua New Guinea, USA, the United Kingdom and Taiwan. MMA also has branch offices registered in New Zealand, Senegal, Ivory Coast (Côte d'Ivoire) and Dubai.

MMA Offshore Vessel Operations Pty Ltd is the operational subsidiary company in Australia for the MMA Group and is the main employer of the MMA Group Australian employees.

## Mandatory Criterion 2

### Describe the Reporting Entities' Operations & Supply Chains

#### 2.1 Corporate Governance Policies & Procedures

MMA does not condone modern slavery in its operations or supply chains and management of modern slavery falls under its overall approach to corporate governance and is set out in our:

- Purpose and Principles statements;
- Code of Conduct,
- Board Charter;
- Anti-Bribery and Anti-Corruption Policy;
- Work Health & Safety Policy;
- Fitness for Work Policy;
- Security Policy;
- Diversity and Inclusion Policy;
- Recruitment and Selection Procedure;
- Contractor Management Procedure; and
- Whistleblower Policy.

These policies and procedures underpin all our operations and places a strong focus on working legally, ethically and safely.

MMA monitors and reviews the effectiveness of these policies and procedures and how well these have been implemented across the business through both internal and external audit regimes.

MMA's Human Resources policies include a zero tolerance of any threat of physical or sexual violence, harassment or intimidation against employees, their family or their close associates. MMA's policies/processes are clearly defined and communicated to all of its employees.

All MMA employees are:

- Treated fairly and equally;
- Not permitted to work in excess of the number of hours permitted by law;
- Provided a safe workplace and all required PPE; and
- May refuse or cease work whenever legally permitted.





## Mandatory Criterion 3

### Describing the Risks of Modern Slavery Practices

#### 2.2 Crewing & Labour Hire

MMA's operations are carried out in accordance with the Maritime Labour Convention 2006 (MLC) which provides minimum standards and regulations relating to the employment, working and living conditions of seafarers. The MLC establishes comprehensive rights and protections of work for all MMA seafarers.

All of MMA's offshore operations, including recruitment and personnel management, are conducted in accordance with the MLC, ensuring that all seafarers employed by MMA are treated fairly, ethically, lawfully and free from any modern slavery practices.

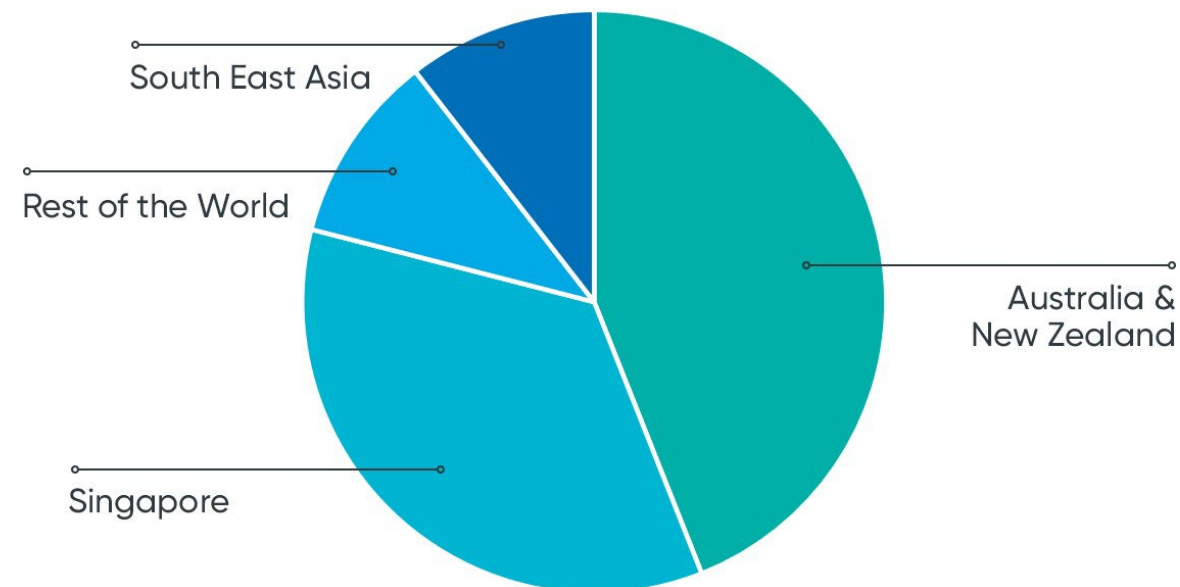
As part of MMA's internal monitoring and continuous improvement activities, processes and procedures relating to the recruitment and ongoing management of personnel undergo rigorous internally lead and externally facilitated third-party audits on a regular basis.

#### 2.3 Supply Chain

MMA has developed a strong supply chain and a network of suppliers and subcontractors to support its operations. These suppliers include marine spare parts Original Equipment Manufacturers (OEM's), providers of logistics, port and agency services and providers of marine fuel, provisions, Personal Protective Equipment (PPE), uniforms and consumables etc.

We have established multi-year relationships with majority of our main suppliers. Approximately 44% of our procurement is from Australian-based companies, whilst 35% is from Singapore, 10.5% from South East Asia and 10.5% from other areas.

#### Suppliers by Region



Whilst MMA does not operate in any of the "high risk" products for modern slavery industries as identified by the Global Slavery Index 2018, MMA acknowledge that modern slavery is prevalent in the global economy. In assessing our operations, the two potential areas of modern slavery risks are considered below:

#### 3.1 Crewing & Labour Hire

MMA owns and/or operates a fleet of over 18 specialised offshore support vessels. To crew these vessels, MMA maintains a pool of around 800 qualified seafarers – comprising both Australian and international seafarers, all operating under both the MLC and Flag State regulations. In addition, MMA occasionally engages local manning agencies to supplement its workforce with local seafarers, divers and other subsea technical specialists. This typically occurs to meet a peak in demand or in countries with specific local manning quotas or rules.

#### 3.2 Supply Chain

MMA endeavours to source products and services from selected suppliers/contractors local to the area of operation (for example from Australian suppliers for Australian operations or from Singaporean suppliers for South East Asian operations).

An exception to this are key vessel parts or spares which have to be sourced from the OEM, such as for the vessels' Dynamic Positioning system or vessel's engines. However, these OEMs providing specialised high-end vessel equipment are generally reputable international companies so the risk of modern slavery occurring within these organisations is considered very low.



## Mandatory Criterion 4

### Actions Taken by the Reporting Entity

#### 4.1 Crewing & Labour Hire

MMA has developed robust recruitment and training procedures which apply to all our personnel (offshore or onshore, permanent or casual) and ensure our staff are all competent, qualified and treated fairly in line with International Labour Organization (ILO) and MLC requirements.

MMA's in-house manning departments (based in Perth and Singapore) ensure all crew members are suitably qualified and trained. A significant number of these crew members are long-term employees. All employees have to be at least 18 years of age prior to commencing employment with MMA.

Australian labour laws require all crew members on vessels operating offshore Australia to be Australian or have full working rights in Australia. Many of the Australian crew members are part of one of the Australian maritime trade unions.

MMA employees are all engaged by way of "common law employment contracts" or "enterprise agreements" both of which are underpinned by either the Australian minimum wage or a modern award applicable to the type of industry or work activity being undertaken. The arrangements are underpinned by Australia's National Employment Standards.

Generally, the Australian maritime trade unions negotiate these enterprise agreements on behalf of their members and these negotiated enterprise agreements are then reviewed by the Fair Work Commission (FWC) prior to implementation and the "BOOT" test is undertaken. The BOOT test is the "Better Off Overall Test" where the proposed enterprise agreement is reviewed by the FWC to ensure employees intending to work under the agreement are not going to be remunerated less than the applicable modern award and as such are not disadvantaged.

Internationally, MMA and its agents comply with the regulations of the MLC and Flag State requirements – both of which stipulate the rights and benefits of seafarers. MMA or its agents don't charge any recruitment fee from the seafarers and all their wages are credited directly to the seafarer's nominated bank account. The working conditions, food and welfare arrangements onboard the ships are in line with MLC and Flag State requirements. MMA makes travel arrangements for the seafarers to and from the vessel. The seafarers are covered under MMA's insurances during their contract duration.

MMA has manning agreements in place with several registered marine/dive manning agencies within Australia and South-East Asia. These agreements follow MMA's supply chain and procurement procedures, including supplier risk assessments and due diligence.

MMA uses only reputable employment agencies to source agency workers and always verifies the practices of any new agent it is using before accepting workers from that agent. Manning agencies are all registered businesses for the purpose of the International Labour Organization's Recruitment and Placement of Seafarers Convention.

Manning agents are also audited by MMA every twelve months to ensure on-going compliance with MLC and other marine and employment regulatory requirements.

Due to the above and MMA's stringent internal recruitment, training and personnel management processes, the risk of modern slavery occurring within MMA's internal workforce is deemed to be extremely low.

#### 4.2 Supply Chain

MMA conducts extensive counterparty due diligence (**New Vendor Due Diligence Process**) on prospective suppliers/contractors. Areas of concern identified in our supply chain including:

- Countries identified as having higher risk of modern slavery violations (such as Myanmar, Indonesia, Mozambique or Malaysia) (Geographical risks); and
- Products or services that may be associated with higher risk of modern slavery violations (for example manning agents) (Product and services risks).

Where, as part of the New Vendor Due Diligence, a potential area of concern for modern slavery risk is identified, MMA will request that the supplier/contractor complete:

- A Due Diligence questionnaire; and
- A Compliance certificate which includes the requirement to abide by both the principles of Modern Slavery Act and the United Nations Global Compact Principles.

This establishes a clear baseline requirement for how MMA expects its suppliers/contractors to manage modern slavery risks. Should modern slavery practices be identified within a potential supplier's/subcontractor's operations or their respective supply chains, the potential supplier/subcontractor will be rejected, and, where required and appropriate, the issue raised with the relevant authorities.

#### 4.3 Procurement Terms & Conditions

Where possible, contractors/suppliers are requested to contract under the MMA Group standard procurement terms and conditions which addresses modern slavery and requires:

- All contractors/suppliers comply with modern slavery legislation;
- Conduct due diligence on its subcontractors to investigate the risk of modern slavery in its supply chain; and
- Mandates the inclusion of similar provisions in its contracts with its subcontractors

Where third party contract terms and conditions are used, MMA endeavours to include similar provisions into its contracts.



## Mandatory Criterion 5

### Assess the Effectiveness of Actions Taken

MMA seeks continual improvement through the re-evaluating our processes and procedures relating to our supply chain and crewing and labour hire on a periodical basis. MMA's processes and procedures are scrutinised by a range of audits and inspections which seek to ensure that all statutory and internal compliance requirements are met. These include (but are not limited to) MLC compliance audits, quality audits, supplier audits and staff opinion surveys.

The implementation of all actions arising from these audits (including actions to address any identified non-compliances) are tracked through MMA's central system for the management of continuous improvement activities (InControl).

Evaluation of the New Vendor Due Diligence (detailed above) identified the need for a more targeted approach and as a result has been amended to reflect this ensuring a targeted approach to suppliers to examine any potential modern slavery practices or risks.

In addition, MMA's employees and suppliers have access to the Group's Whistleblower Policy – including its third party reporting hotline (administered by PwC) and a dedicated, confidential whistleblower email address. MMA's Whistleblower Policy provides an avenue for MMA employees, its suppliers/subcontractors and their employees, to both confidentially and anonymously report or raise any concerns of suspected unethical or corrupt behaviour - which includes modern slavery concerns or practices.

## Mandatory Criterion 6

### The Process of Consultation

During this reporting period, key stakeholders from Human Resources, Procurement, Legal and Operations assessed the risk of modern slavery in our supply chains and evaluated the current framework in place to identify modern slavery in our operations, in particular our supply chain.

MMA's key policies, procedures and processes apply to and are rolled out for all companies within the MMA Group, where MMA own or control those companies and delegates of these companies were consulted in the development of this Statement.

This Statement has been approved by the Board of MMA Offshore Limited (the parent company of the MMA Group) and is signed by its Managing Director, Mr David Ross.





## Mandatory Criterion 7

### Any Other Relevant Information

None to report.



David Ross  
Managing Director





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