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MODERN SLAVERY REPORT 2024

Introduction

This Modern Slavery Statement is made on behalf of Hofmann Engineering Pty Ltd (ABN 39 114 806 969) (“Hofmann” or the “Company”) and all its subsidiaries (the “Hofmann Group” or “Group”) pursuant to the Modern Slavery Act 2018 (Cth) (“the Act”). This statement outlines the steps the Group has taken to identify, assess, and address modern slavery risks across its operations and supply chains during the financial year ending 30th June 2024.



This Modern Slavery Statement is intended to comply with the Act and addresses the seven mandatory criteria for content set out in the Act as listed below.

Mandatory Criteria	Section
Identify the reporting entity	Introduction
Describe the reporting entity's structure, operations and supply chains	Structure, Operations and Supply Chains
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Modern Slavery Risks
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Actions to Assess and Address Modern Slavery Risks
Describe how the reporting entity assesses the effectiveness of these actions	Measuring Effectiveness
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Consultation and Collaboration
Provide any other relevant information	

Our Commitment

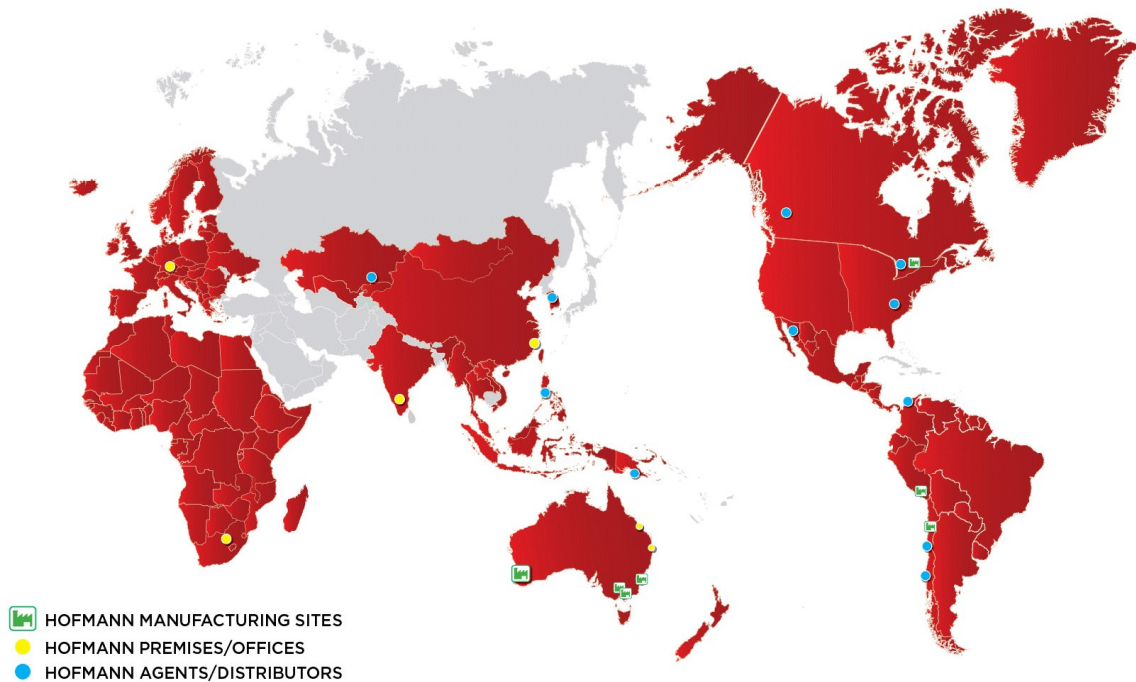
The Hofmann Group, its board of directors, senior executives and employees are committed to operating responsibly and transparently, with zero tolerance for modern slavery in all its forms, including forced labour, human trafficking, and child labour. We recognize our responsibility to respect human rights and to take meaningful action to prevent modern slavery within our business operations and supply chains.

Structure, Operations, and Supply Chains

1. Structure

This statement is a joint Modern Slavery Statement on behalf of Hofmann Engineering Pty Ltd and all reporting entities within the Group as listed below.

Name of Entity	Incorporated	Equity Held %
Hofmann Industrial North America	Canada	100
Hofmann Canada Investments	Canada	100
Hofmann Engineering Peru	Peru	100
Hofmann Peru Investments	Peru	100
Hofmann Engineering Chile	Chile	100
Hofmann Chile Investments	Chile	100
Hofmann Industrial Europe GmbH	Germany	100
Ningbo Hofmann Import Export Co Ltd	China	100
Hofmann SA SPV	South Africa	70
Hofmann Engineering South Africa	South Africa	51



2. Operations

Hofmann is a privately owned business with its headquarters in Perth, Western Australia. The Company operates across eight countries directly, including Australia, Canada, Chile, China, Peru and Chile, and globally via a network of accredited agents and distributors. The Group employs approximately 700 employees globally. The Group operates in a wide range of business sectors including mining, resources, civil infrastructure, transport, and renewable energy, providing high quality, complex, manufactured components.

3. Supply Chains

Our supply chain is extensive and involves relationships with suppliers and service providers across multiple countries. Key areas of our supply chain include:

- Raw materials sourcing, including supply of castings and forgings from Asia
- Manufacturing, including manufacture of components in South America
- Logistics, including transportation and distribution services globally
- Service providers, including outsourced labour, cleaning, and maintenance

In total, the Hofmann Group engaged with approximately 1,400 suppliers over 24 countries during the financial year. Significant areas of expenditure with suppliers during the year include:

- Castings
- Forgings
- Bearings
- Steel for fabrication
- Transport
- Cutting tools and similar supplies
- Welding supplies

We acknowledge that parts of our supply chain may operate in regions with higher risks of modern slavery, particularly where there are vulnerable workers or weak labour protections.



Modern Slavery Risks

1. Identifying Modern Slavery Risks in Operations

The vast majority of the Hofmann Group workforce is directly employed and not sourced through external labour hire organisations. Hofmann Group ensures that all its employees globally are employed on terms that meet or exceed relevant employment legislation or in the absence of such legislation then to meet or exceed good employment practice. It is considered that direct employment reduces the risk of modern slavery within the Group's operations.

2. Identifying Modern Slavery Risks in the Supply Chain

Hofmann recognizes that modern slavery risks may arise in various parts of our supply chains. To identify these risks, we have undertaken a comprehensive risk assessment, focusing on:

- Geographic risks: Evaluating countries and regions where modern slavery is prevalent.
- Sector/industry risks: Assessing industries and sectors with high modern slavery risks.
- Product/service risks: Identifying specific products or services that may involve higher risks of forced labour or exploitation.
- Entity risks: Evaluating the practices and policies of our suppliers and service providers.

To assist with understanding and assessing the risk of Modern Slavery within the supply chain Hofmann has utilised evidence from a number of external bodies that have expertise in this area including the Australian Human Rights Commission, Fair Supply and Walk Free. The evidence gathered has informed the Group that the risk of Modern Slavery is higher in certain countries¹ including:

- North Korea
- Eritrea
- Mauritania
- Saudi Arabia
- Turkey
- Tajikistan
- United Arab Emirates
- Russia
- Afghanistan
- Kuwait

The Group does not source any products, materials or services from any of these countries.

The research has also identified that increased risk of Modern Slavery exists in the acquisition of certain goods² including:

- Rubber products
- Bricks
- Construction materials
- Minerals
- Cocoa
- Tea

The vast majority of goods sourced by the Group do not include goods in the above categories.

¹ Source: walkfree.or/global-slavery-index/finding/global-finding/

² Source: Australian Government Attorney

Additionally it is recognised that Modern Slavery practices may be found in the procurement of services including:

- Labour hire, particularly unskilled labour hire
- Cleaning services
- Maintenance services

3. Key Risk Areas

Based on our risk assessment, the following areas have been identified as having a higher risk of modern slavery:

- **Raw material sourcing:** Particularly in countries with poor labour protections and high levels of corruption.
- **Manufacturing processes:** In regions where there is reliance on migrant labour or where labour rights are not adequately protected.
- **Outsourced services:** Such as cleaning and security services, where workers may be subject to poor working conditions and underpayment.



Actions to Assess and Address Modern Slavery Risks

1. Policies and Governance

The Group has implemented several policies and procedures to mitigate the risks of modern slavery within our operations and supply chains, including:

Code of Conduct	Our Code of Conduct outlines our commitment to human rights and ethical business practices. All employees and suppliers are expected to adhere to these principles.
Supplier Code of Conduct	This document sets out our expectations for suppliers, including prohibitions on forced labour, child labour, and human trafficking. Suppliers are required to demonstrate compliance with these standards.
Whistleblower Policy	We have established a reporting mechanism that allows employees, suppliers, and other stakeholders to report concerns about unethical or illegal behaviour, including modern slavery.

2. Due Diligence and Risk Management

To further mitigate modern slavery risks, the Group has implemented the following due diligence measures:

Supplier Assessments	We conduct regular assessments of our suppliers, focusing on high-risk areas. This includes supplier audits, site visits, and evaluations of their labour practices.
Contractual Obligations	We have included specific clauses in our contracts with suppliers, requiring them to comply with modern slavery laws and allowing for termination of contracts if they fail to meet our standards.
Training and Awareness	We provide training to employees and key suppliers on modern slavery risks and our expectations for ethical behaviour. This training is designed to raise awareness and equip stakeholders with the knowledge to identify and address potential issues.

3. Remediation Processes

In the event that modern slavery is identified within our operations or supply chains, the Group is committed to taking swift and effective action. Our remediation process includes:

Investigation	Prompt investigation of all reported or suspected cases of modern slavery.
Collaboration	Working with relevant stakeholders, including NGOs, local authorities, and affected individuals, to address and remedy the situation.
Support for Victims	Providing support to victims of modern slavery, including ensuring their safety and access to necessary services.

Measuring Effectiveness

The Group is committed to continuous improvement in addressing modern slavery risks and to continually assessing the effectiveness of our actions to combat modern slavery. We measure the effectiveness of our actions through:

Supplier Audits	We conduct regular audits of high-risk suppliers to ensure compliance with our standards and legal requirements.
Performance Indicators	We track the number of audits conducted, non-compliance issues identified, and remediation actions taken.
Review and Improvement	Our modern slavery risk management approach is reviewed annually to identify areas for improvement and to respond to emerging risks.

Consultation and Collaboration

The Group recognizes the importance of collaboration in addressing modern slavery. We have engaged in consultations with:

- **Internal Stakeholders:** Including employees, management, and board members, to ensure alignment and commitment across the organization.
- **External Stakeholders:** Such as suppliers to share best practices and enhance our approach to modern slavery risk management.



Conclusion

The Hofmann Group is fully committed to upholding human rights and eradicating modern slavery in all its forms. This statement provides details of the Hofmann Group's actions to date and the Group is pleased to provide this report on its progress towards the elimination of modern slavery.

Approval

This statement for the Hofmann Group was approved by the Board of Directors of Hofmann Engineering Pty Ltd as the parent entity on 23rd October 2024.

A handwritten signature in black ink, appearing to read 'Erich Hofmann', is written in a cursive style.

Erich J Hofmann
Managing Director of Hofmann Engineering Pty Ltd
October 2024