



# Contract Resources Group Modern Slavery Statement 2023

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# 1 Message from our CEO

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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 2023.

At Contract Resources, we continue to be committed to respecting human rights across all areas of our business and ensuring that modern slavery is eradicated from our supply chain. As a company, we have continued to take steps to ensure that our stakeholders are aware of the work we undertake to deliver our services in an ethical, sustainable, and responsible way.

As a management team, we undertake to ask the right questions and be inquisitive in assessing leading indicators and potential warning signs.

A handwritten signature in blue ink, appearing to read 'M Charles', is positioned above a horizontal line.

Michael Charles  
CEO and Managing Director  
3 October 2023

## 2 Modern Slavery and Values

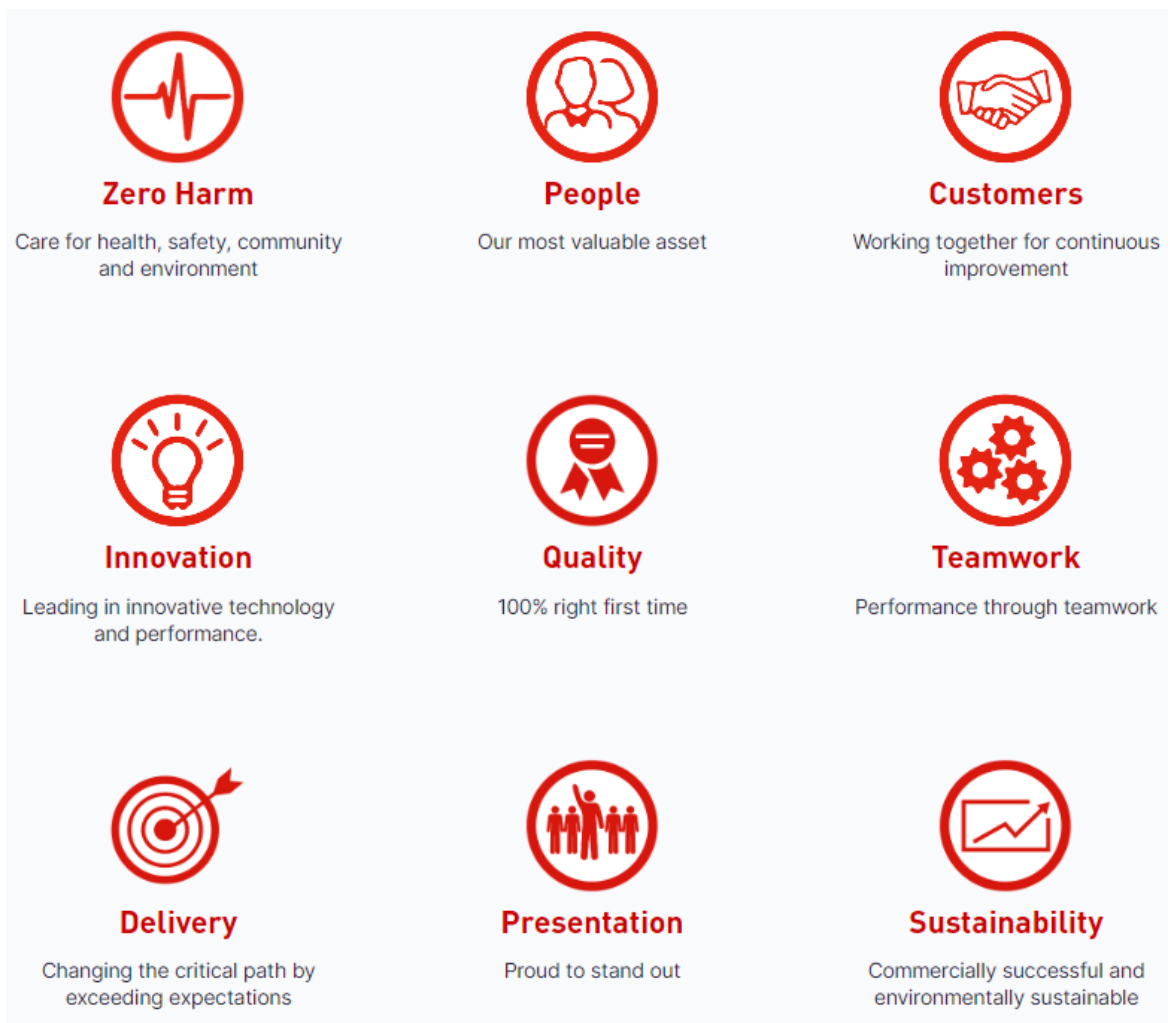
This Statement has been published in accordance with the *Modern Slavery Act 2018*. It identifies the steps Contract Resources has taken to identify, assess, mitigate, and remediate modern slavery risks in our operations and supply chain during the year 1 July 2022 to 30 June 2023.

Contract Resources is committed to acting ethically and with integrity in all business dealings. Contract Resources has a responsibility to respect human rights and aim to foster an environment where every employee and all business are treated fairly and respected.

Modern slavery is defined as serious forms of exploitation and includes human trafficking, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour. Contract Resources is committed to implementing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chain.

As a leader in specialised industrial services, Contract Resources has been operating in the global market since the 1990s. We are strongly focused on the health and safety of our employees, clients, and the communities in which we operate. Fundamental to our ongoing success we value people, innovation, and sustainability.

Contract Resources is committed to transparency around our supply chains and to developing and implementing policies and procedures that reduce the risk of modern slavery across all facets of our operations.

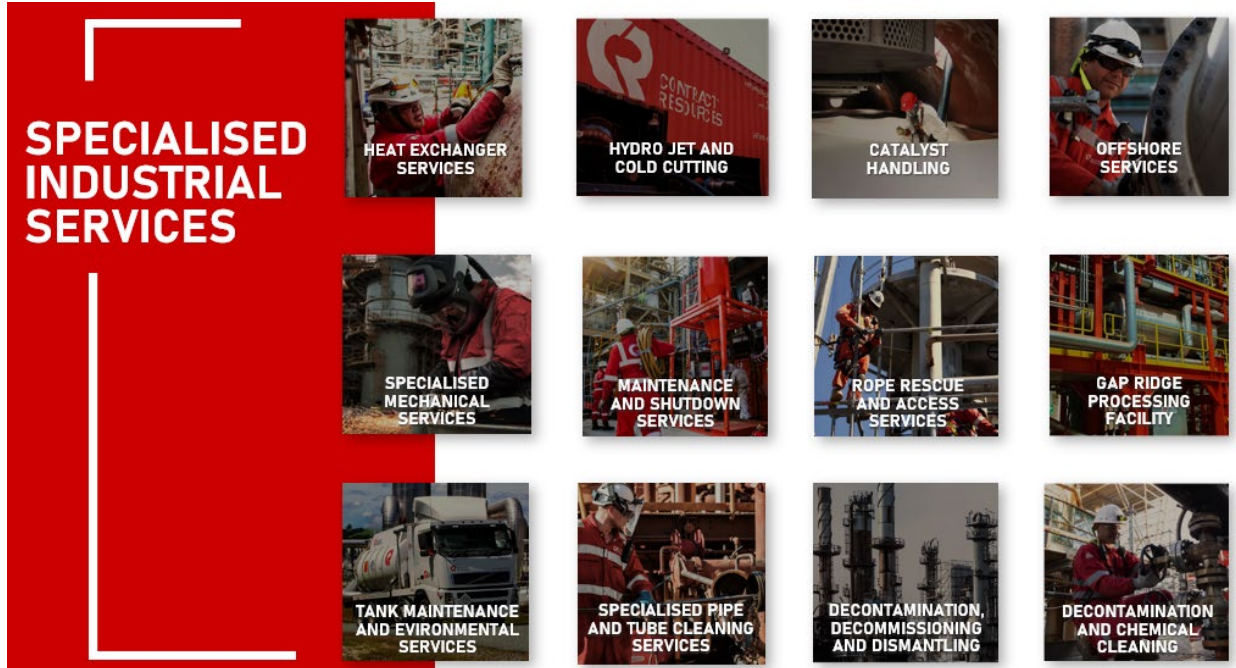


### 3 Contract Resources' structure, operations, and supply chain

Operating in Australia, New Zealand, PNG, Egypt and GCC countries in the Middle East, Contract Resources has a growing global presence.

Appendix A depicts our locations globally.

Services offered by Contract Resources include:



Key markets we operate in include:

- Liquefied Natural Gas (LNG);
- Refining / Petrochemical;
- Minerals processing;
- Fertilizers;
- Food processing (dairy);
- Upstream oil and gas;
- Renewable energy including geothermal;
- Mercury and waste decontamination.

Globally, we employ between 1200-1800 (depending on project timing). Our workforce is employed under a mixture of individual contracts and regional industrial agreements.

Our supply chain focuses on safety, reliability and quality and utilises suppliers of plant and equipment, PPE, and raw chemicals. A number of suppliers are highly specialised and, in some cases, limited supply alternatives are available. Each item is sourced from manufacturers and resellers that meet Contract Resources' standards.

### 4 What risks do we foresee?

Contract Resources has identified potential modern slavery risks associated with both our supply chain and operations through direct engagement of third-party suppliers, and indirectly through the companies that supply goods and services to our suppliers.

The key risks include:

- Safety practices;
- forced or compulsory labour;

- wages and benefits;
- work hours;
- bribery and corruption.

Greater exposure has been identified as follows:

- **Geography** - operating in geographies classified as “high risk” including developing nations and conflict-affected zones and sourcing equipment and materials from geographies that have little or no human rights or worker protections, poor law enforcement or where modern slavery exploitation is widely practiced; and
- **Labour**: employing or engaging third party suppliers (e.g., labour hire) who employ vulnerable workers with basic skills, including migrant employees and employees from low socio-economic or culturally diverse backgrounds.

## 5 What controls do we have in place?

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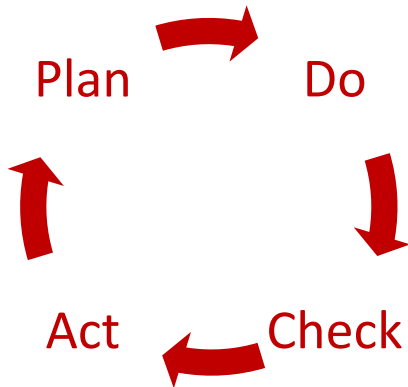
Respecting human rights and promoting the eradication of modern slavery is embedded in our governance and management system. Policies and procedures we have in place and regularly review include:

- **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?

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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?

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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 and audit of Middle East procurement and supplier practices and procedures;
- Renewal of several industrial agreements in Australia through collective bargaining with employees and their union representatives;
- Annual review and evaluation of corporate risk register which includes risks around employees, supply chains and modern slavery concerns;
- 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 including modern slavery questionnaire;
- Continued audit of supplier management procedure with actions noted and corrected;
- Promoted diversity within the team with focus on indigenous cultures including participation in NAIDOC activities and continued education and training on indigenous history (Australia),
- Reviewed Disciplinary, Whistleblower and Bullying procedures to ensure alignment to commitment to eliminate any modern slavery risks;
- Site visits by Managing Director to accommodation facilities in ME to verify and witness conditions.
- Initiated review of IT platform with view to implement online learning management and training system including data security.
- Establishment of new country entry policy which includes review of legal systems, corruption rankings and safety/conflict-affected rankings.
- Internal audit and update to the existing whistleblower hotline program available to employees and suppliers.

## 8 Future Actions

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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 audit of Middle East procurement and supplier practices and procedures.
- Implement review of procurement categories to identify high-risk indicators of modern slavery practices (i.e., business sector, employment practices, etc).
- 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

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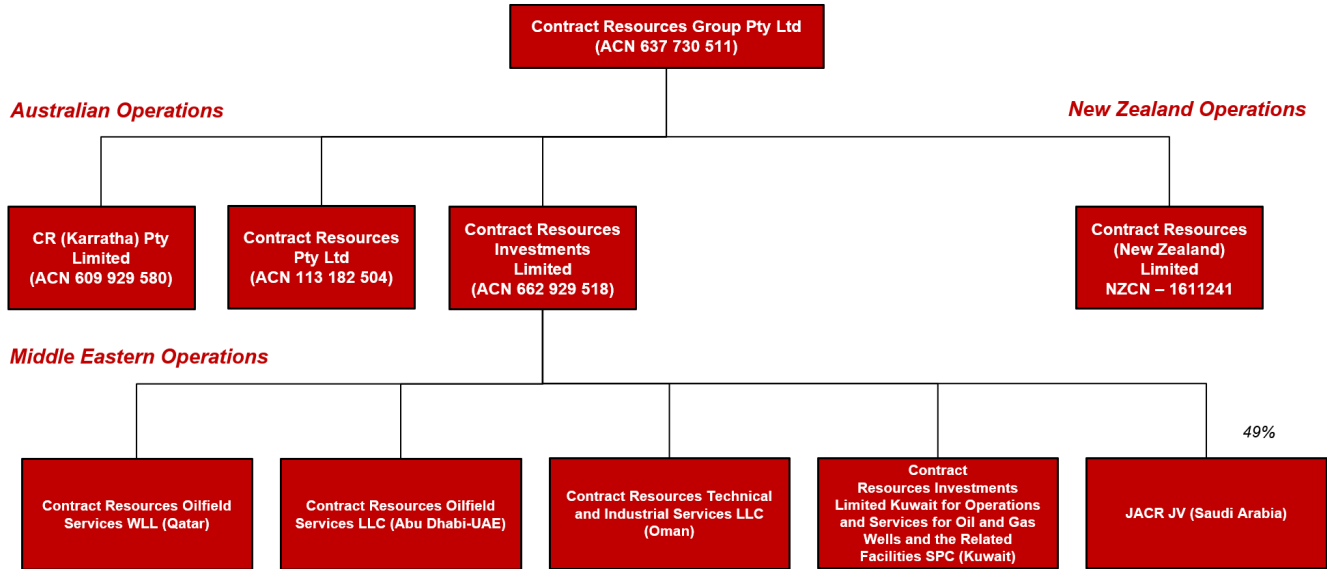
Stakeholders from each of the entities within the Contract Resources group, as identified in **Appendix A**, have worked collaboratively to prepare this statement. Working groups have assessed and identified modern slavery risks in our business. We discussed information regarding the actions we intend 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 30 August 2023 Board meeting.



# Appendix A - Corporate Structure and Locations

## Corporate structure as of 30 June 2023



# Our Locations

