



MODERN SLAVERY STATEMENT 2024



Introduction

This modern slavery statement is for Spiecapag Australia Pty Ltd (Spiecapag) ABN 53 067 306 138, covering the reporting period 1 January to 31 December 2024 (2024 reporting period). It has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) (the Act).

At Spiecapag, we acknowledge our duty to proactively combat modern slavery by instituting measures aimed at identifying and eliminating exploitation from our operations and supply chain. We recognise that combating modern slavery necessitates a collaborative endeavour from every part of our organisation, and we are dedicated to continually enhancing awareness, enacting policies, and promoting transparency and accountability. Through these efforts, we strive to eradicate modern slavery and uphold the fundamental tenets of human rights.

Approval

This Modern Slavery Statement was approved by the Board of Spiecapag in their capacity as the principal governing body of Spiecapag on 11 June 2025.

This statement is signed by John Walsh in his role as Managing Director and Director of the Board of Spiecapag on 11 June 2025.

John Walsh
Managing Director of Spiecapag Australia Pty Ltd
11 June 2025

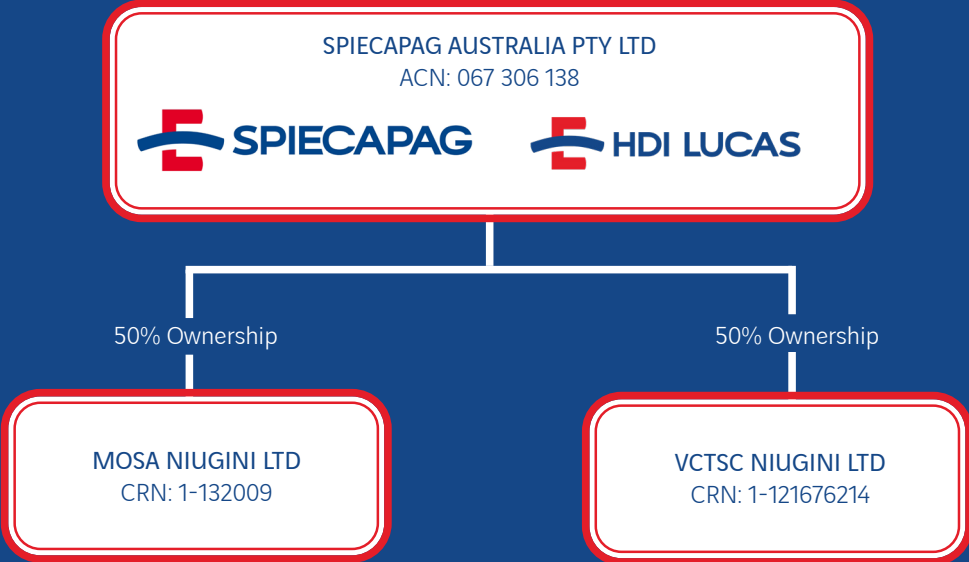
Our structure, operations, and supply chain

Structure

Spiecapag Australia Pty Ltd (trading as Spiecapag and HDI Lucas) is a leading pipeline contractor headquartered in Brisbane, Queensland. Spiecapag Australia Pty Ltd is a wholly owned subsidiary of the French registered company Spiecapag SAS.

The ultimate parent company of Spiecapag is VINCI SA, a French company that is listed on the Paris stock exchange and is a member of the Euro Stoxx 50 index. In the 2024 reporting period, VINCI SA had revenues of €71.6 Billion and approximately 282,000 employees worldwide.

Spiecapag has a 50% interest in two Papua New Guinea (PNG) registered companies as shown below.



Spiecapag is also a 50% shareholder in Menard Oceania Pty Ltd & Spiecapag Australia Pty Ltd (MOSA JV) (ABN: 80 211 525 404), an unincorporated joint-venture that supports the Lihir Group Stabilisation Project in Papua New Guinea.



Operations

Spiecapag's core business is undertaking specialist pipeline construction to deliver essential infrastructure projects across Australia and the Oceania Region.

Servicing the energy, resources, and utilities sectors, Spiecapag provides an extensive range of services covering design, engineering, procurement, construction, project management, training, and commissioning.

For the 2024 reporting period, Spiecapag employed 720 staff, across offices in Brisbane (headquarters), Toowoomba, and Perth, and the following four projects:

- 1. Western Outer Ring Main Project (Victoria);
- 2. Kurri Kurri Lateral Pipeline Project (New South Wales);
- 3. JANSZ-IO Compression Project (Western Australia); and
- 4. Lihir Ground Stabilisation Project - MOSA JV (Papua New Guinea).

Supply Chain

In the 2024 reporting period, Spiecapag spent approximately \$154M purchasing products and services from more than 850 direct suppliers across nine countries.

Approximately 91% of Spiecapag's total procurement spend during the reporting period was with direct suppliers located in Australia. Overseas procurement accounted for the remaining 9%, with direct suppliers located in France, Canada, China, South Korea, Italy, Germany, India, PNG, and UK.

The main types of goods and services Spiecapag procured during the reporting period were:

- 1. Personnel, including via contractors and labour hire;
- 2. Pipe;
- 3. Valves and fittings;
- 4. Welding services;
- 5. Logistics;
- 6. Plant and equipment;
- 7. Quarry products;
- 8. Concrete products;
- 9. Technical services; and
- 10. Site amenities.



Modern Slavery Risks in Operations and Supply Chain

Spiecapag is aware that the global construction sector is regarded as an industry with a higher degree of exposure to various forms of modern slavery.

Potential modern slavery risks in our operations

In assessing the risk profile of our operations for the 2024 reporting period, we consider the fact that given Spiecapag undertakes the bulk of its operations in sites located within Australia, the likelihood of modern slavery conditions being in existence is significantly reduced within our direct operations. Australia has implemented robust legislative and regulatory frameworks to prevent, detect attempts at, and criminally punish all forms of modern slavery.

Notwithstanding, Spiecapag acknowledges the increased risk profile associated with our operations in Papua New Guinea, a country where the prevalence of modern slavery conditions is significantly higher than that of Australia. Labour force characteristics that may pose potential risks in our PNG operations include:

- The use of contractors and outsource labour (including third party labour hire agencies to source workers).
- The temporary nature of work types requiring non-permanent employment contracts, including temporary and fixed-term contracts.
- The use of lower skilled workers; and
- The isolated location of the project site.

These characteristics may mean that, in certain circumstances, Spiecapag has reduced visibility over the recruitment conditions used to source our indirect labour force.

Potential modern slavery risks in our supply chain

Our suppliers operate, produce, and source across several/different sectors. Some of these sectors can be described as high-risk. For the 2024 reporting period, Spiecapag has identified the following areas of its operations that may have modern slavery risks in its supply chain:

- a) Suppliers or sub suppliers that were to use raw materials produced using modern slavery in the manufacture of textiles, footwear, and branded products.
- b) Use of an indirect workforce provided by third parties where they engaged low skilled labour to provide cleaning services to our leased offices or site locations.
- c) Procurement of the following products:
 - i) Products containing steel.
 - (1) Steel could have been produced using raw materials extracted or refined under modern slavery conditions.
 - ii) Products containing rubber.
 - (1) May be procured as formed product, the production of which could have been done under modern slavery conditions, including the farming and supply of the raw material.



Actions taken to assess and address modern slavery risks

Policies, Guides and Processes

Spiecapag understands that identifying and addressing modern slavery risks requires an adaptive approach that is underpinned by sound governance, policies, and processes.

As a wholly owned subsidiary of VINCI SA (a voluntary signature to the United Nations Global Compact¹), we are governed by VINCI’s Guide on Human Rights (Guide), a framework document which is based on the United Nations Guiding Principles and the main international conventions².

The Guide has identified five areas that cover the entire life cycle of projects as follows:

- Labour Migration and Recruiting Practices
- Working Conditions
- Living Conditions
- Human Rights Practices in the Value Chain
- Local Communities

Guidelines which constitute benchmarks for the five areas have been created to encourage Spiecapag employees dealing with human rights issues to consider how our existing processes and activities manage Spiecapag's modern slavery risk profile, and to identify areas for improvement.

Together with initiatives to raise awareness, and the sharing of information on best practice, Spiecapag is committed to developing a culture of prevention in this area. This is complemented by the requirements outlined in our own policies, codes, guides and processes relating to Quality, Remuneration, Health & Safety, Anti-Discrimination & Equal Employment Opportunity, Complaints & Grievance, Ethics, and Anti-Corruption.

Spiecapag also encourages the confidential reporting of concerns via the use of the VINCI Group Whistleblowing procedure.

Training and Internal Awareness

All employees are required to undertake online Human Rights training as part of the onboarding process for new

staff. The training is used as part of our broader efforts to increase company-wide awareness about modern slavery issues, whilst also better equipping new team members with the ability to identify modern slavery supply chain risks in new and existing suppliers.

Supplier Engagement and Due Diligence

Spiecapag implements a robust procurement and purchasing process to provide a framework to identify, mitigate and manage procurement risks that may adversely affect our operations. Our vendor prequalification process is used to identify high-risk third parties where additional checks are undertaken to ensure they are not engaged with any improper practice that may be inconsistent with our Ethics and Conduct expectations as set by our head entity VINCI SA.

Modern Slavery Assessment Tool

During the reporting period, Spiecapag invested in the use of a third-party modern slavery assessment tool and service to assess, address and report on the modern slavery risk profile that exists across our operations and supply chain. Assessment requests were issued to all our suppliers, and approximately 53% achieved completion. The intent is to carry this process forward as an annual assessment. It will also form part of our updated supplier onboarding process.

The tool provides Spiecapag with insights into our supplier’s inherent risk profiles, and this information can be used to tailor mitigation measures to those suppliers where their respective risk profiles need to be improved.

Recruitment Controls for Managing Modern Slavery Risks

Our direct workforce is covered by individual employment contracts and modern awards which confer at least minimum pay and entitlements and provide for consultation regarding significant operational changes where appropriate.

We ensure that when we engage with relevant recruitment agencies or labour hire providers, they comply with the provisions of the *Employment Regulation 1980* (PNG), together with all Philippine Overseas Employment Administration requirements for those employees we engage from the Philippines.

Contractual Governance

During the reporting period Spiecapag continued implementation of modern slavery clauses in new supplier contracts, including the ability to terminate a supply contract if a supplier breaches a legislative requirement, or behaves in a manner that is inconsistent with our (VINCI) Guide to Human Rights and or our (VINCI) Code of Ethics and Conduct.

Assessing the effectiveness of actions taken

Having an effective modern slavery program means that we can identify, assess, and mitigate modern slavery risks in our operations and supply chain in a transparent and collaborative way.

Evaluating the impact of our initiatives in this area was a central goal behind introducing our online modern slavery assessment tool during the reporting period. As this marks the first year of its use, the tool has established a baseline that will enable us to objectively track the effectiveness of our actions over time. This will become clearer as suppliers complete their annual assessments, allowing us to monitor changes in risk profiles and measure progress resulting from implemented mitigation strategies year over year.

This initiative was taken as part of our commitment to continuous improvement and will help shape our modern slavery road map for the coming reporting periods.

Our consultation processes

Spiecapag operates and is managed as an integrated group with overarching policies, systems and processes that are designed to be consistently applied across our operated functions and projects.

Consultation between Spiecapag and the entities we own or control was undertaken in the development of this statement. Consultation included involvement from representatives across our organisation.



1 The United Nations Global Compact is the world’s largest corporate sustainability and corporate social responsibility initiative. It supports global companies committed to responsible business practices in areas such as human rights, labour, the environment, and corruption.
2 The Universal Declaration of Human Rights, The International Covenant on Civil and Political Rights, The International Covenant on Economic, Social and Cultural Rights, The Fundamental Conventions of the International Labour Organisation, The OECD Guidelines for Multinational Enterprises; and The United Nations Guiding Principles on Business and Human Rights.

Spiecapag Australia Pty Ltd
145 Eagle Street
Brisbane QLD 4000

www.spiecapag.com.au