

Inaugural Modern Slavery Statement

SMC Marine

14 September 2026

Reporting Period 1 July 2024 – 30 June 2025

SMCMARINE

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Reporting Period: 1 July 2024 to 30 June 2025

Background

This is SMC Marine's inaugural Modern Slavery Statement. During FY2026, SMC Marine became aware that its consolidated revenue had exceeded the reporting threshold under the *Modern Slavery Act 2018 (Cth)* during FY2025. Accordingly, this inaugural Statement has been prepared to address the period from 1 July 2024 to 30 June 2025 and outlines the measures implemented by SMC Marine during that period to identify and address modern slavery risks within its operations and supply chains.

1. Identifying the Reporting Entity

This Modern Slavery Statement is made by **SMC Marine Pty Ltd (SMC Marine)**. This statement also applies to entities owned or controlled by SMC Marine Pty Ltd during the reporting period. SMC Marine confirms it is a reporting entity under the *Modern Slavery Act 2018* (Cth).

2. Structure, Operations, and Supply Chains

Structure:
SMC Marine is an Australian-based marine construction and engineering firm.

Operations:
Our operations primarily involve wharf construction, piling, underwater engineering, and maritime infrastructure maintenance. We employ over 100 people primarily located in NSW, QLD and WA.

Supply Chains:
Our supply chains include the procurement of steel and concrete, specialised maritime equipment, labour hire services, and subcontracted engineering services.

SMC Marine's operations rely on a combination of direct employment, subcontractors, and specialist labour providers, particularly for construction, piling, marine works, and maintenance activities. Key supply inputs include construction materials, fabricated components, plant and equipment, and specialised services. Suppliers range from local Australian businesses to overseas manufacturers and distributors.

3. Risks of Modern Slavery Practices

SMC Marine recognises that modern slavery risks may arise within both its operations and supply chains. While the business does not tolerate modern slavery practices, risk exposure may exist due to the nature of the construction and marine infrastructure sector and reliance on third-party providers.

Operational Risks may include the use of labour hire and subcontracting arrangements, where SMC Marine has reduced direct visibility over recruitment practices, employment conditions, or worker vulnerabilities, including for migrant or temporary workers.

Supply Chain Risks may arise through the procurement of materials, components, and equipment that are manufactured or sourced through complex global supply chains, including regions where labour regulation, enforcement, or governance may be weaker.

These risks are considered indirect in nature and are managed through proportionate, risk-based controls.

4. Actions Taken to Assess and Address Risks

SMC Marine has implemented a range of measures to assess and address modern slavery risks in a manner proportionate to the size and nature of the business.

Risk assessment:
SMC Marine has undertaken a high-level assessment of modern slavery risks across its operations and supply chains, informed by industry risk profiles, labour models used on projects, and categories of suppliers engaged.

Policies and governance:
SMC Marine maintains policies and procedures that promote ethical conduct, lawful employment practices, and compliance with applicable workplace laws, including a Modern Slavery Policy and related governance frameworks.

Supplier and contractor controls:
Standard contractual arrangements include clauses requiring suppliers, subcontractors, and labour hire providers to comply with applicable workplace, employment, and human rights laws. These controls are designed to support responsible sourcing and escalation where concerns are identified.

Operational controls:
Modern slavery risks are managed alongside broader WHS, payroll, and contractor management processes to ensure consistent oversight and integration with existing business systems.

5. Assessing the Effectiveness of Actions

SMC Marine assesses the effectiveness of its response to modern slavery risk management approach through management review of operational controls, consideration of internal audit findings relevant to labour and payroll compliance, and monitoring issues raised through established grievance mechanisms, including the Whistleblower Policy.

Insights gained through these activities inform ongoing refinement of controls where appropriate.

6. Process of Consultation

Relevant internal stakeholders, including operational and procurement personnel, were consulted in the development of this statement to ensure that risk identification and mitigation activities reflect current business practices across the group.

7. Other Relevant Information

Modern slavery risk management is integrated with SMC Marine's broader governance, risk, and compliance framework. SMC Marine remains committed to continuous improvement and will continue to review its approach to identifying and managing modern slavery risks in line with evolving business activities and regulatory expectations.

Board Approval

This Statement was approved by the Board of Directors of SMC Marine Pty Ltd on 14 September 2026 in accordance with section 13 of the *Modern Slavery Act 2018 (Cth).*



Peter Philipp

Director
14 September 2026


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