

# MODERN SLAVERY STATEMENT

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## LINKFORCE

### Overview

This document contains Linkforce's annual Modern Slavery Statement for the period 1 July 2022 to 30 June 2023. This statement has been developed in accordance with the requirements of the Australian Modern Slavery Act 2018 (Cth) (the Act) and sets out the actions taken by Linkforce Corporation Pty Ltd and its wholly owned and controlled entities (referred to collectively in this statement as 'Linkforce', the 'Group', the 'Company') to identify, assess and address modern slavery risks in its operations and supply chain.

Linkforce are committed to continuous improvements targeted to reduce the risk of modern slavery. Key improvements implemented within the reporting period include;

- Modern Slavery risk based audits have been added to the Group Audit Schedule, with examination into our top risk in the extended supply chain complete.
- Training has been provided to all members of the Procurement department, to improve the understanding of modern slavery and to educate on how to recognise and report.
- Modern Slavery Steering Committee initiated, with periodic meetings held.
- Supplier and Contractor Pre-Qualification applicants are now required to agree to provide information regarding their own modern slavery process and practises, if requested, to confirm compliance with the Act.

### What is Modern Slavery?

Modern Slavery is the severe exploitation of other people for personal or commercial gain. It includes situations where coercion, threats or deception exploit victims and compromises their freedom.

### Modern Slavery Act 2018

The Act came into force on 1 January 2019, establishing a mandatory reporting regime for entities with consolidated revenue in excess of \$100 million AUD.

The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.

### Who we are

Linkforce is a leading integrated maintenance, engineering and project services delivery business with locations throughout Australia.

Our comprehensive range of capabilities enable us to offer a fully integrated delivery model. We are committed to delivering positive outcomes for Clients across the mining, industrial, telecommunications and energy markets.

Linkforce was founded in 2007, starting our journey with a small crew of shutdown specialists and a single utility operating in the Pilbara. Currently our workforce has over 2,800 personnel with an extensive fleet of modern vehicles, plant & equipment that operate nationwide.

As a privately owned business, our founder has established a set of core values that have been a key attribute to our continual growth and success, anchoring every aspect of our business. Our core values are People, Unity, Agility, Determination & Delivery. These values define who we are and how we operate.

### Identify the reporting entity

This joint statement is submitted on behalf Linkforce Corporation Pty Ltd (ABN 45 602 050 644), a reporting entity under the Act and includes the following entities:

- Linkforce Engineering (ABN 57 123 543 699)
- Nighthawk Nominees Pty Ltd (ABN 50 098 640 629)
- Linkforce Projects Pty Ltd (ABN 48 154 587 309)
- Linkforce Maintenance Services Pty Ltd (ABN 72 611 966 440)
- Linkforce Industrial Services Pty Ltd (ABN 53 615 813 039)
- Linkforce Site Services Pty Ltd (ABN 63 615 813 020)
- Linkforce Field Services Pty Ltd (ABN 29 623 671 189)
- Linkforce Procurement Pty Ltd (ABN 44 630 985 125)
- Linkforce Shared Services Pty Ltd (ABN 79 631 066 692)
- Linkforce Equipment Pty Ltd (ABN 54 643 949 295)
- Linkforce Industrial Maintenance Pty Ltd (ABN 45 666 545 393)
- Aurora Global Pty Ltd (ABN 55 600 473 630)
- Austwide Communications Pty Ltd (ABN 77 620 613 185)
- Link Construct Pty Ltd (ABN 87 630 627 271)
- The Trustee for Link Workforce Trust (ABN 57 554 027 585)
- The Trustee for Linkforce Work Trust (ABN 91 509 510 630)

### Describe the reporting entity's structure, operations and supply chains

Headquartered in Perth, Western Australia, Linkforce is supported by a network of workshop and depot facilities located in Kewdale, Jandakot, Port Hedland, Karratha, Newman, Kalgoorlie, Leonora and Mackay.

Linkforce has two main operating divisions, Maintenance & Shutdowns and Projects, which undertake works predominantly in Western Australia's Pilbara and Goldfields regions.

### Maintenance & Shutdowns

Linkforce is an experienced maintenance specialist with proven execution capabilities in shutdown works. As a leading integrated maintenance provider Linkforce regularly services Blue Chip clients within the resource sector bringing a focus on extending asset value and life. Our multidisciplinary service offerings across mechanical, fabrication, construction, access and electrical enable us to provide efficient and cost-effective shutdown solutions.

### Projects

Linkforce is a proven multi-disciplinary project delivery contractor with capabilities for delivering Brownfields and Greenfield CAPEX or OPEX work packages. Experienced in complex project construction management Linkforce has

successfully completed a high volume of project packages for our Blue Chip client base. From design through to completion and handover we are able to supply, maintain and manage all aspects of projects works including shutdowns, remedial works, capital works and expansion projects.

## Supply Chain

We rely on our pre-qualified suppliers and subcontractors to help us deliver outstanding services for our clients and maintain our status as an industry leader. As at 30 June 2023, the Company maintained a supplier database exceeding 1400 suppliers, with the majority (over 80%) headquartered in Western Australia. The remainder are all located in Australia, with only three exceptions, based in Bali, USA and Dublin.

The Company sources a diverse range of goods and services. The highest categories of spend for the year ended 30 June 2023 were:

- Skilled subcontractors
- Wet/dry plant and equipment hire
- Labour hire
- Construction materials and consumables

## Describe the risks of modern slavery practises in the operations and supply chains of the reporting entity and any entity it owns or controls

All of Linkforce's employees are engaged directly under permanent, fixed term, part time or casual contracts significantly lowering the risk of modern slavery. However, some parts of our operations engage small amounts of labour through third party providers and subcontractors. Linkforce may not have direct supervision over these third-party workers nor have knowledge of the terms and conditions of employment.

We recognise the increased risk when engaging third parties to provide low skilled labour although we note for Linkforce this is rare. Often these low skilled roles are filled by migrant workers, students, and Australians with low levels of education.

Whilst Linkforce continues to develop policies and procedures to help prevent modern slavery occurring in our immediate supply chain, we understand we are not immune to risk in our extended supply chain. Some of these extended supply chains involve products and countries previously identified as being at the highest risk of modern slavery.

Linkforce considers the following categories of goods and services that we procure or that our supplier's procure present a higher risk of exposure to modern slavery:

### Direct Supply Chain:

- administrative and support services (such as facilities management).

### Extended Supply Chain:

- personal protective equipment (PPE), in particular clothing;
- laptops, computers, mobile phones; and
- transport and logistics (including ocean freight and offshore warehousing).

### Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address these risks, including due diligence and remediation processes

With reference to our direct supply chain, Linkforce takes some comfort from the fact the Global Slavery Index ranks Australia as low risk for modern slavery practises courtesy of robust labour laws and enforcement mechanisms. This level of comfort cannot always be afforded to our extended supply chain.

Linkforce takes a multi-faceted approach to assessing and managing human rights and modern slavery risks in our operational activities and supply chain. We oppose the occurrence of modern slavery in our operations and those of our suppliers.

#### Policies

Linkforce has core governance policies designed to address human rights matters including:

- *Anti-Fraud and Anti-Corruption Policy* – details the company's committed opposition to all forms of fraud, misappropriations, and other irregularities.
- *People Policy* – outlines commitments to treat all people in a fair and equitable manner and ensure our work locations and our supply chain is free from any forms of modern slavery or human rights abuse.

#### Supplier and Contractor Pre-Qualification

As part of our supplier and contractor onboarding process applicants are required to agree to provide information regarding their own modern slavery process and practises, if requested, to confirm compliance with the Act.

#### Terms and Conditions

During the previous reporting period Linkforce incorporated modern slavery provisions into our standard contractual terms and conditions for the supply of goods and services. These provisions ensure the supplier or contractor acknowledges that it:

- has complied, and continues to comply at all times, with applicable Modern Slavery Laws;
- has taken, and will continue to take, all reasonable and necessary steps to identify, investigate and eliminate Modern Slavery in its operations and supply chains to ensure that no such Modern Slavery exists; and
- will promptly upon request provide all information reasonably requested by Linkforce regarding their operations and supply chains to enable Linkforce to comply with its own Modern Slavery obligations.

### Describe how the reporting entity assesses the effectiveness of such actions

Linkforce's Modern Slavery Steering Committee was initiated in the reporting period and meets regularly to review supplier and contractor performance. To date we have not identified any breaches of the Modern Slavery Act in our operations or supply chain, however we continue to encourage our employees and business partners to remain vigilant and report any infringements. Where an issue is raised we will work closely with the relevant parties to appropriately resolve concerns within the offending operation and/or supply chain.

### Describe how the reporting entity consulted on its statement with entities it owns or controls

All entities under the scope of the statement are encompassed by means of centralised consultation, such as a central procurement function for all entities.

The Modern Slavery Steering Committee consults with management of the listed entities and reports to the Managing Director to disseminate or consult as necessary.

**Provide information that the reporting entity considers relevant**

Linkforce are committed to continuous improvements targeted to reduce the risk of modern slavery. Key improvements implemented within the reporting period have been detailed in the Statement Overview.

**Approval**

The Modern Slavery Statement has been approved by the principal governing body for the reporting entity; Sole Director, Luke Herbert.



**Luke Herbert**

08 February 2024