



Minprovisе International Pty Ltd

MODERN SLAVERY STATEMENT 2022

Our Commitment to delivering a more sustainable world, free from human rights abuses

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Australian Modern Slavery Act Statement

This is our first Statement in response to the Australian Modern Slavery Act. This Statement outlines the governance processes, activities conducted and progress we have made throughout our financial year to improve our understanding and management of the risks of modern slavery and human trafficking in our operations and supply chains.

We take modern slavery and human rights abuses very seriously and are committed to continuously improving our modern slavery prevention program. This Statement was developed in consultation with our modern slavery stakeholders, and then reviewed and approved by the Sole Director Graham Townsend in their role as principal governing body of Minprovis on 9 September 2022.



Graham Townsend

Company Owner / Director

September 2022

The sections of the Statement that specifically address what we have done to meet the core mandatory criteria required by the Australian Modern Slavery Act (2018) are outlined in the table below.

MODERN SLAVERY ACT 2018 AUSTRALIA	MINPROVISE 2022 STATEMENT
✓ Identify reporting entities	✓ Refer to Section 2
✓ Describe structure, operations and supply chains	<ul style="list-style-type: none"> ✓ Minprovisе operates through 5 business areas and in 8 market areas ✓ Minprovisе has a mainly local base of direct and indirect suppliers ✓ Refer to Sections 2 and 3
✓ Describe risks of modern slavery in operations and supply chains	<ul style="list-style-type: none"> ✓ Minprovisе acknowledges the risk of modern slavery in its industry and conducts regular risk assessments ✓ Minprovisе has not identified any modern slavery in its or its suppliers' operations ✓ Refer to Section 4
✓ Describe actions taken to assess and address such risks, including due diligence and remediation processes	<ul style="list-style-type: none"> ✓ Minprovisе maintains specific policies and conducts specific due diligence measures ✓ Refer to Sections 5 and 6
✓ Describe assessment of effectiveness of actions	<ul style="list-style-type: none"> ✓ Minprovisе regularly reviews its modern slavery approach ✓ Refer to Section 6
✓ Describe the consultation process	<ul style="list-style-type: none"> ✓ Various functions and executive management have been involved in the preparation of this statement ✓ Refer to Section 7
Include other information considered relevant	N/A

1.0 INTRODUCTION

Minprovisе recognise that freedom from slavery is a fundamental human right and operate in compliance with fundamental labour standards. Minprovisе’s practices are consistent with the UN Guiding Principles on Human Rights and Business, and Minprovisе operates in compliance with all applicable laws prohibiting modern slavery. Minprovisе’s policies and standards, which are based on International Labour Organisation conventions, prohibit any use of forced or child labour in Minprovisе’s operations or supply chains. Additionally, Minprovisе recognises and respects employees’ right to freely associate, organise and collectively bargain, and complies with working hour requirements as established by local laws.

Minprovisе is committed to respecting and supporting the dignity, well-being and human rights of our employees and those who we engage with through our supply chain.

We seek to utilise ethical suppliers and expect their support in the identification of modern slavery risks throughout our supply chain.

Modern slavery is a term used to describe serious exploitation and undermines freedom of individuals. The purpose of this Statement is to outline Minprovisе’s commitment to mitigating risks of modern slavery within its supply chain, provide awareness of what is modern slavery and encourage stakeholders to be mindful of and report suspected acts of modern slavery.

Stakeholders include any individuals and organisations that we do business with that provide goods or services.

This is our first Statement in response to the Australian Modern Slavery Act. The Statement outlines the governance processes, activities conducted and progress we have made throughout our financial year to improve our understanding and management of the risks of modern slavery and human trafficking in our operations and supply chains.

The sections of the Statement that specifically address what we have done to meet the core mandatory criteria required by the Australian Modern Slavery Act (2018) are outlined below.

2.0 MANDATORY CRITERION 1; IDENTIFY REPORTING ENTITIES AND DESCRIBE THEIR STRUCTURE

MINPROVISE was established in 2004 with a core business of reducing the risk associated with operating and maintenance of crushing equipment. With this expertise we have been able to grow our knowledge and service offerings to become the company we are today.

As of 31 December 2021, Minprovisе has a workforce of 600+ employees. Detailed information on Minprovisе is available at www.minprovisе.com.au.

Minprovisе operates primarily in Australia and operates in accordance with Minprovisе applicable values, policies and operating procedures.

3.0 MANDATORY CRITERION 2; DESCRIBE THE REPORTING ENTITIES' OPERATIONS AND SUPPLY CHAINS

Describing the Risks of Modern Slavery Practices in the Operations and Supply Chains of the Reporting Entity and any Entities the reporting Entity Controls or Owns

3.1 Minprovisе's Operations

MINPROVISE was established in 2004 with a core business of reducing the risk associated with operating and maintenance of crushing equipment. With this expertise we have been able to grow our knowledge and service offerings to become the company we are today.

We have an excellent reputation amongst our clients for outstanding quality, performance and safety initiatives. We believe we are one of the most capable, professional and reliable contractors in the industry.

We have undergone substantial and sustained growth to emerge as one of Australia's leading multi-disciplinary Services, Maintenance and Specialty Equipment and Products provider and today offer innovative, integrated solutions to a diverse customer base throughout Australia and Overseas in the Mining, Oil and Gas and Construction Industries.

Minprovisе operations primarily cover Australia, with offices and facilities in:

- Welshpool, Western Australia
- Karratha, Western Australia
- Port Hedland, Western Australia
- Brisbane, Queensland

Minprovisе customers are primarily large Mining multinationals operating in Australia.

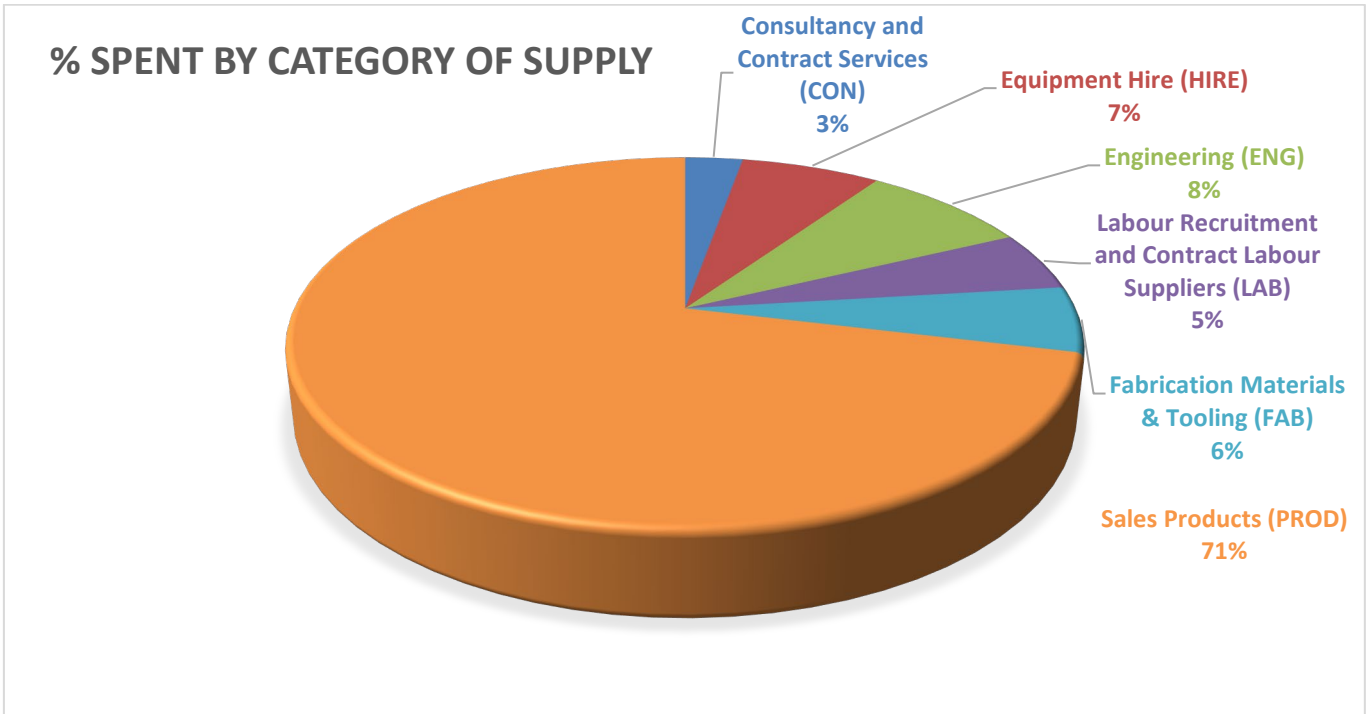
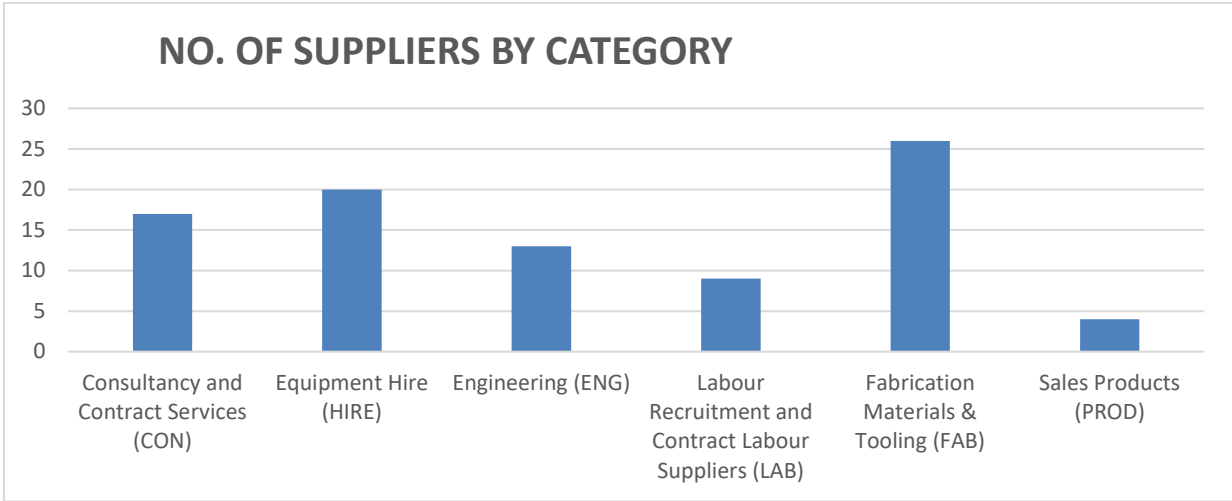
The operations comprising Minprovisе share common leadership, management, policies and procedures.

3.2 Minprovisе's Supply Chain

In the 2020/2021 financial year, Minprovisе's supply chain consisted of almost 200 suppliers and a significant amount of its procurement spending was comprised by specialist labour hire services, engineering services, fabrication material and tooling, specialised equipment hire, sales products, among other services.

In 2020/2021 financial year, Minprovisе engaged approximately 140 suppliers.

Depictions of Minprovisе's supply chain by number / percentage of suppliers to Minprovisе by category of supply are presented below:



4.0 MANDATORY CRITERION 3; DESCRIBING THE RISKS OF MODERN SLAVERY PRACTISES

Describing the Risks of Modern Slavery Practices in the Operations and Supply Chains of the Reporting Entity and any Entities the reporting Entity Controls or Owns.

4.1 Minprovisе’s Operations

Minprovisе does not condone modern slavery in its operations. The Minprovisе’s practices conform to international standards for human rights, and it manages its operations according to fundamental labour standards. The Minprovisе’s guidelines and standards are based on the ILO Convention that prohibits all use of forced labour or child labour.

In preparing this Statement, Minprovisе has performed a risk assessment on the risk of Modern Slavery in its operations. A summary of the findings is presented below:

Category	Description	Risk Rating	Controls & Mitigations
Recruitment & Employee Relations	Current Minprovisе employees	Low	See section 5 of this Statement
	Engagement of new employees / contractors	Low	
Minprovisе owned or controlled facilities	Minprovisе offices and workshops	Low	

4.2 Minprovisе’s Supply Chain

Reference is made to the depiction of Minprovisе’s supply chain in section 3.1 of this Statement. Minprovisе comments are as follows:

- 1) Generally speaking, Minprovisе does not have suppliers based in countries that present a high risk of Modern Slavery. Specifically:
 - a) The majority of Minprovisе’s suppliers are based in Australia (having an overall weighted average vulnerability to Modern Slavery of 6.1 according to the Global Slavery Index 2018).
 - b) No Minprovisе supplier is sourced from countries presenting a high vulnerability to Modern Slavery risk (as analysed by the Global Slavery Index 2018).
- 2) In relation to potential high-risk categories of supply to Minprovisе:
 - a) The majority of the categories of supply in Minprovisе’s (by number of suppliers) are not in the top 5 high risk industries for imports into Australia (being, as presented by the Global Slavery Index 2018, electronics, garments, fish, rice and cocoa).
 - b) Whilst some specific scopes of supply to Minprovisе may fall within the Global Slavery Index 2018’s high risk category for Australian imported goods (namely PPE and other garments, phone, computers, and accessories), no Minprovisе suppliers of these items are based in high risk jurisdictions.

- c) In any event, all suppliers to Minprovisе are subject to the mitigations and controls outlined in Section 5 of this Statement.

This is an informal assessment based on information found in Commonwealth Modern Slavery Act – Guidance for Reporting Entities, and the Global Slavery Index 2018 and in relation to Minprovisе’s operations and supply chain in general (not on a project specific basis).

5.0 MANDATORY CRITERION 4: ACTIONS TAKEN BY THE REPORTING ENTITY

Describe the Actions taken by the Reporting Entity and any Entities that the Reporting Entity Owns or Controls to Assess and Address these Risks, including Due Diligence and Remediation Processes.

5.1 Minprovis Overview

Minprovis has existing policies and standards regulating modern slavery risk within the group’s operations. These have been developed to comply with global laws prohibiting modern slavery. These are detailed below and throughout this Statement.

5.1.1 Values

Minprovis conducts its business responsibly and ethically. Minprovis’s values are Respect, Teamwork, People, Integrity, Communication and above all we are SAFE. These values are embedded in Minprovis’s policies, code of business conduct, and safety culture. Minprovis therefore recognises and is driven to comply with international legal and ethical standards and expectations in relation to human rights and modern slavery. These are formally expressed throughout Minprovis’s policies, code of business conduct, and safety culture.

5.1.2 Requirements and Standards

Minprovis’s practices conform to international standards for human rights, and it manages its operations according to fundamental labour standards. Minprovis’s guidelines and standards are based on the ILO Convention that prohibits all use of forced labour or child labour.

Minprovis has several codes of conduct, policies and other documents prohibiting Modern Slavery. These are:

Minprovis Document No.	Description	Document Type
MINWA-HR-POL-0007	Minprovis Code of Conduct	Policy
MINWA-HR-POL-0013	Modern Slavery Policy	Policy
MINWA-HR-POL-0001	Diversity Equal Opportunity Policy	Policy
MINWA-HR-POL-0010	Harmonious Workplace	Policy
MINWA-HR-POL-0005	No Discrimination Harassment and Bullying	Policy
MINWA-HR-POL-0002	Whistle Blowers Policy Statement	Policy
MINWA-HR-PLN-0001	Employee Relations Management Plan	Plan
	Human Rights and Modern Slavery Statement	Statement

5.1.3 Employment and Labour Rights

Minprovisе does not condone Modern Slavery in its operations. Minprovisе recognises and respects the employees' right of association, organisation and collective bargaining, and its guidelines conform to the labour regulations stipulated by all local authorities.

Minprovisе does not employ or engage employees less than the minimum age for work in any of the regions in which we operate; and there are no junior positions in the corporate organisational structure where younger than the minimum age is a requirement.

Minprovisе prohibits discrimination in hiring, wages, equal pay, protections and conditions of employment. Minprovisе reiterates the documents outlined in section 5.1.2 above.

5.1.4 Training and Awareness

As a responsible organisation Minprovisе supports and promotes human rights. Minprovisе ensures its operations do not breach international standards and conventions in line with United Nations guidelines; avoid causing or contributing to adverse human rights impacts through our activities and Minprovisе seeks to prevent adverse impacts on human rights that are directly linked to activities through its business relationships.

Minprovisе's Code of Conduct (COC) is approved by the Minprovisе Executive Leadership Team and supported by its management structure. The COC clearly communicates core principles to support Minprovisе's organisation and partners to align with UN Global Compact:

- Comply with all applicable laws and respect internationally recognised human rights everywhere Minprovisе operates;
- Follow consistent procedures to achieve a high common standard throughout Minprovisе;
- Ensure all parties Minprovisе works with share and implement the same standards of human rights;
- Always report incidents of unacceptable behaviour or deficiencies in the system;
- Uphold the right for all employees to be free to associate, organise and bargain collectively.

This year the Minprovisе induction presentation was updated to ensure that our staff have an awareness of Modern Slavery and Human Rights. This includes being able to identify and reporting risks of Modern Slavery within the company.

5.1.5 Supplier Due Diligence

As part of the process of due diligence, Minprovisе ensures company principles are upheld along our supply chain. Minprovisе's vendor evaluation platform is based on the UN Global Compact principles, where all vendors must describe their approach to Human Rights, Labour, Environment and Anti-Corruption compliance. This includes a risk assessment of potential violations within their own supply chain. Minprovisе's management system requires all vendors and sub-contractors be evaluated prior to the placement of orders for work, services or products.

In the last 12 months we've done a detailed review of our Supply Chain. This process incorporates requirements in our Standard terms and conditions to ensure that all existing and future vendors to Minprovisе agree to abide by the principles of the Act, and that they do not promote or carry out any unlawful human rights practices, as covered in the Modern Slavery Act 2018, and ensure that all vendors do not engage in any type of human trafficking, child or forced labour practices, etc., whilst doing business with Minprovisе.

Suppliers will be required to provide Minprovisе with a Transparency Statement stating their position with regards to the Act and associated Human Trafficking and related exploitation practices, or a declaration that they will abide by Minprovisе’s Code of Business Conduct. Failure to comply with this requirement may exclude the vendor.

In limited circumstances, a potential vendor that does not meet Minprovisе’s approval threshold or a subsequent in-depth review can nonetheless be approved for use, but only subject to approval by the General Manager (or equivalent authorised person).

5.1.6 Remediation

Minprovisе has in place a reporting framework, through which employees and contractors are able to report instances, of actual or suspected unethical or unlawful conduct, without fear of intimidation or reprisal that maintain confidentiality and protect the rights of both the reporter and the potential subject of a report.

Minprovisе is committed to fully investigating all concerns raised, and to rectifying any wrongdoing which may have occurred to the extent practicable in all circumstances, and to the principle of fairness in all investigations.

Minprovisе encourages reporting concerns immediately and within the management structure.

During fiscal year 2021, no human rights or modern slavery concerns were identified within Minprovisе’s operations or supply chain.

6.0 MANDATORY CRITERION 5: ASSESS THE EFFECTIVENESS OF ACTIONS TAKEN

Describe How the Reporting Entity assesses the Effectiveness of Actions being taken to Assess and Address Modern Slavery Risks

Minprovisе undertakes regular internal and external auditing of its practices and business relationships to assess adherence to our policies and regulatory compliance requirements.

Minprovisе is ISO certificated (ISO 9001:2015, ISO 14001:2015, and ISO 45001:2018) and audited annually by DNV Australia.

Audits undertaken by Minprovisе and any external audits are reviewed annually by the Executive Leadership Team through our Management Review process to ensure that our Management System is suitable, adequate, effective and align with the strategic direction of the company.

No incidents or practices that could be described as causing or contributing to Modern Slavery have been reported in any Minprovisе operations, and while we are aware of the risks of contributing to or being linked to Modern Slavery practices through our supply chain, we are not aware of any such incidences for the reporting period.

7.0 MANDATORY CRITERION 6: THE PROCESS OF CONSULTATION

Describe the Process of Consultation with any entities the Reporting Entity Owns or Controls

This Statement was primarily drafted by Minprovisé's Executive Commercial Manager with assistance from key Modern Slavery stakeholders within Minprovisé. The stakeholder group were all given the chance to comment on this statement during the drafting process.

Minprovisé does not own or control any other entities and therefore this criteria is not applicable.

8.0 MANDATORY CRITERION 6: ANY OTHER RELEVANT INFORMATION

Not Applicable