



KAEFER

KAEFER Integrated Services Pty Ltd



Modern Slavery Statement FY 2024

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1.0 INTRODUCTION

KAEFER is a leading provider of turnkey construction solutions, maintenance and asset integrity services. With multidisciplinary teams delivering specialised services across major projects, we provide tailored solutions that enhance safety, efficiency, and asset longevity.

At KAEFER, we're dedicated to building a workplace and community centred on respect, opportunity, and growth. We engage effectively with stakeholders, honour cultural heritage and diversity, and invest in community projects to create economic opportunities and support a strong residential workforce. We prioritise inclusivity and diversity, ensuring equitable opportunities through our in-house training programs. Our cadetship, apprenticeship, and traineeship initiatives are open to all individuals, regardless of race, gender, sexual orientation, or background. By providing comprehensive training, we empower participants for successful career advancement.

We recognise that our industry harbours inherent modern slavery risks and we take responsibility for doing our part to better understand, address and mitigate those risks.

KAEFER respects human rights, is committed to environmentally and socially responsible corporate governance, and aims to base its relationship with suppliers on trust, loyalty, consistent performance, professionalism, ethics, innovation, and sustainability. We require this behavior not only from ourselves, but also from our suppliers and their contracted companies in the supply chain. We see ourselves as part of a value chain and place our direct suppliers under obligation to pass along the principles and requirements described below to their suppliers as well. We strive to achieve healthy, sustainable growth together with our suppliers.

This statement is our Fourth Statement under the Australian Modern Slavery Act (2018) Cth for our Australian reporting entity and its controlled and owned entities.



Figure 1: Our KAEFER Values

2.0 KAEFER GROUP: OUR CORPORATE STRUCTURE, OPERATIONS AND SUPPLY CHAIN

2.1 The Reporting Entity and Our Corporate Structure

This Modern Slavery Statement is submitted by KAEFER Integrated Services Pty Ltd (ABN 83 009 046 191) (KAEFER Australia), as the reporting entity under the Australian Modern Slavery Act 2018 (Cth) (MSA). This Statement also covers the entities controlled by KAEFER Integrated Services Pty Ltd for the reporting period (calendar year 2024) covered by this statement. These are KLH Australia Pty Ltd (ABN 24 611 399 672) and Isologics Pty Ltd (ABN 93 614 949 898).

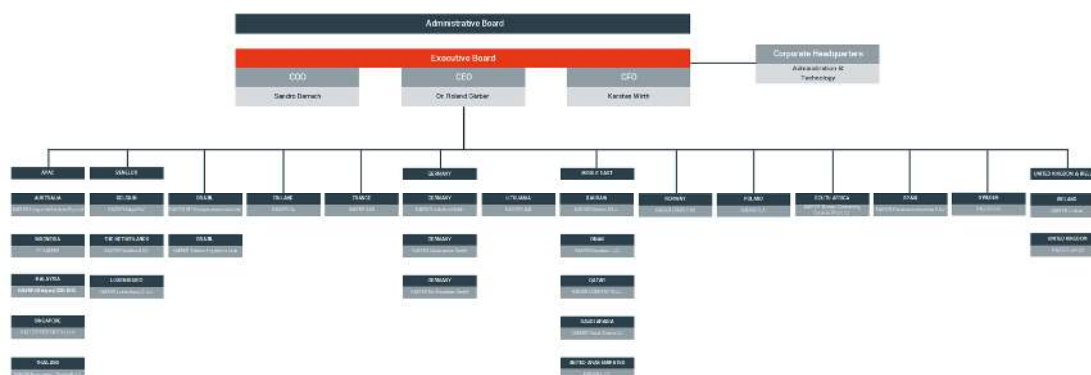


Figure 2: Our organisational structure

KAEFER Australia is a part of the KAEFER SE & Co. KG parent company (KAEFER), headquartered in Bremen, Germany. KAEFER is a privately-owned company with a global presence, including across Australia and Southeast Asia, as depicted in Figure 2: Our organisational structure.

2.2 Our Operations, Team, and Supply Chain

KAEFER Australia has an established and widespread presence across Australia, operating in the country for over 40 years. Our experience spans from minor works through to the delivery of major projects and sustaining capital projects through the provision of shutdown, maintenance and decommissioning services. With over 100 years of experience across industrial facilities, mines, refineries, oil and gas plants, and marine environments, KAEFER is well-positioned to lead in creating a sustainable and energy-efficient future. In all our endeavours, we strive to be RED – Recognised, Efficient, and Different.

Since 1918, KAEFER has grown from Carl Kaefer's innovation in cold storage insulation to a global leader in plant integrity services. Serving sectors like Mining, Energy, Defence, and Construction, KAEFER operates in over 30 countries with 33,000 employees. Our approach combines innovation, digitalisation, and customised solutions to meet client needs. We focus on quality, safety, and cost-efficiency, driven by in-house expertise and integrated services.

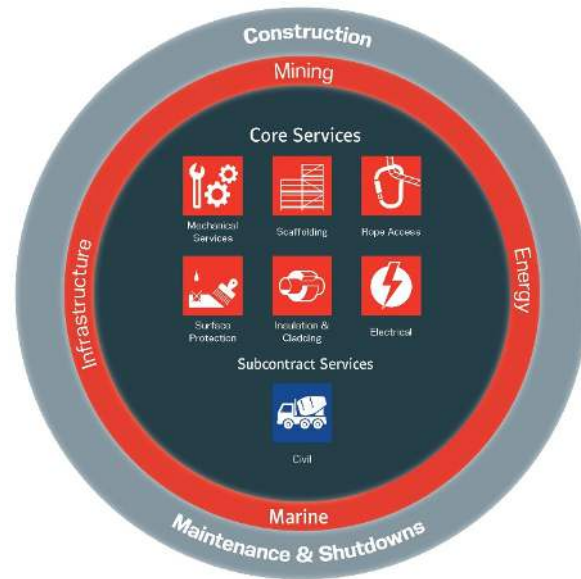


Figure 3: KAEFER and KAEFER Australia Services Portfolio

KAEFER Australia is a leading provider of turnkey construction, maintenance and industrial services with multidisciplinary teams delivering specialised services across major projects, we provide tailored solutions that enhance safety, efficiency, and asset longevity.

- **Structural, Mechanical & Piping (SMP):** KAEFER's services range from providing minor works through to large-scale support, including on-site welding, structural assembly & erection and mechanical & piping installations.
- **Surface protection:** We specialise in surface preparation and protection across the Energy, Mining, Industrial Infrastructure, and Marine sectors. Our offerings include protective coatings, abrasive blasting, high-performance systems (e.g., Humidur), EonCoat and various spraying and cleaning techniques.
- **Insulation and cladding:** We develop, create, and fit insulation for industrial and high-tech applications, including thermal and cryogenic insulation, noise protection and acoustic insulation.
- **Access solutions:** Offering a complete range of in-house scaffolding and rope access solutions.
- **Passive fire protection:** implementing passive fire protection that provide the highest level of safety for people.
- **Marine structures remediation:** We excels in Brownfield projects and marine structure remediation. We address challenges like corrosion, tidal movements, and operational environments.
- **Asbestos management:** We specialise in the safe removal and disposal of hazardous materials, including asbestos and lead-based paints. We are fully licensed for both friable and non-friable asbestos removal nationwide and ensure compliance with all site-specific and client regulations.

In Australia, we have a team of over 1,400, and five offices across the country located in Perth (Head Office), Naval Base, Geraldton, Kalgoorlie, Port Hedland, Karratha, Adelaide, Darwin, Brisbane, Gladstone and Mackay to support our site-based teams.



Figure 4: Australian operations

We employ people all around the world, whether in administrative roles or in operational functions. We take pride in being different and foster a culture that embraces the many facets of diversity inherent in our workforce. This brings out the best in our people, who embody our values and live them every day. We strive to offer the best possible opportunities for First Nations peoples. From vocational and educational training, employment opportunities, as well as management and leadership development, KAEFER aims to provide an environment where growth is not just supported but also fostered. The reasoning behind this is simple: the more we support our people, the more they support us and our clients.

KAEFER Australia's supply chain provides goods and services for the delivery of our industrial services. Our broad range of service offerings means that our supply chain is equally diversified. Globally, KAEFER Group Sustainability have mapped procurement categories, as illustrated in Figure 5: KAEFER procurement categories. KAEFER Australia's procurement categories are largely aligned with this global picture, providing us with initial insights into key risk areas for modern slavery within our supply chain.

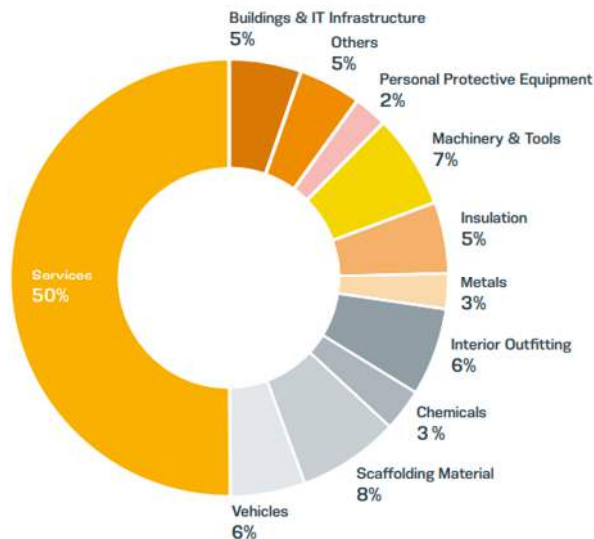


Figure 5: KAEFER procurement categories

KAEFER globally and also in Australia, is committed to long-term relationships with our suppliers. This is reflected in the fact that the number of core suppliers we engage with has risen only slightly over the reporting period for this Statement, whilst with continued growth we are increasing the number of suppliers we work with. With a large and labour-intensive supply chain, KAEFER Australia, and indeed KAEFER globally, recognises the need for a robust supply chain management system. We are, therefore, striving to build on our current system, particularly through increasing transparency and dialogue with our suppliers. We provide further details on our current system, targets and actions below.

3.0 MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

KAEFER has established a comprehensive risk management system for human rights and environmental protection in the supply chain based on the UN Guiding Principles for Business and Human Rights and OECD Guidelines for Multinational Enterprises. To embed supply chain risk management in our organisation, KAEFER has nominated Supply Chain Sustainability Officers in the operating units, who are responsible for human rights and environmental risk management in the day-to-day management of our suppliers. Internal guidelines ensure a consistent and systematic approach across all KAEFER entities worldwide. KAEFER Australia's review was based on the following indicators, which are also guiding our detailed risk assessment:



Figure 6: Risk Indicators

- Sector and industry risk, both for our operations and supply chain. This was facilitated by the fact that we already have a sound understanding of our major procurement categories.
- Product and services risks.
- Geographic risks, such as products sourced from high-risk geographies.
- Entity risks, such as entities having been previously implicated in modern slavery or human trafficking incidents, or other incidents related to corruption.

Based on our review of operational risks, KAEFER Australia believes that our exposure in this area, or rather the exposure of our own and/or supplier/contractor workers, is relatively small. This is due to the strong and legally compliant labour and human resources practices we implement and our supplier and contractor due diligence and assurance requirements that seek to ensure that our partners have similarly strong practices in place. We expect our suppliers to live by the same standards as we do. Our expectations are defined in the KAEFER Supplier Code of Conduct, which is a mandatory part of supplier contracts at KAEFER. Among others, the Supplier Code of Conduct contains requirements with regards to business integrity, labour and human rights, including forced labour and child labour, and environmental protection. In addition to labour risks, we have identified the following risks as particularly relevant to our industry and operations, in descending order of risk:

- Healthcare equipment, e.g., PPE
- Automobiles and components
- Industrials, e.g., machinery, equipment and tools
- Materials, e.g., chemicals and metals

The majority of KAEFER Australia's Tier-1 suppliers are based in Australia, with the remaining ones being located around Italy, Malaysia, Mauritius, the Netherlands, and Singapore. Of

these locations, modern slavery risk is known to be higher in Malaysia and Mauritius. While Australia is a generally low-risk location, we recognise that according to the Global Slavery Index, cases of forced labour exploitation in Australia do exist and that these practices predominantly occur in industries of relevance to our business as set out above.

It is our intention to expand on this initial risk inventory, grow our understanding of risk and build upon existing mitigation and assurance actions to address those risks.

4.0 ADDRESSING THE RISKS OF MODERN SLAVERY

4.1 Governance and Compliance

KAEFER operates in a dynamic environment influenced by various external and internal factors. These factors can significantly impact both our financial and non-financial targets. Therefore, identifying and managing risks and opportunities is a key element of our strategic management. The Executive Board is responsible for ensuring effective risk management across the entire group. The implementation of risk management within our operational units and departments lies with their senior management who builds on subject matter experts and project managers to perform day-to-day risk management.

Our Australian governance structures are also integrated into a global framework, and as part of this, our Australian Board of Directors attends several meetings annually with the German Board. This ensures global alignment on key strategic issues, which for KAEFER Group, includes sustainability and our human rights performance.

Globally, we can leverage unique support in furthering our counter-slavery response by drawing on a dedicated CRS Department and a cross-departmental ESG Project Management Office, as depicted in Figure 7: KAEFER Group (global) sustainability governance. Human rights and supply chain sustainability are already firmly established on the agenda of both Units and some of our response is being driven centrally for KAEFER Group as a whole



Figure 7: KAEFER Group (global) sustainability governance

One of the objectives for KAEFER Australia going forward, is for the newly established ESG committee to set out targets and actions per department. This includes GHG Emissions and waste, Health and Safety, Employment, Training & Education, Diversity & Equal, Opportunity,

Freedom of Association & Collective Bargaining, and Non-Discrimination Anti-Corruption, Supply Chain Sustainability & Economic Performance.

4.2 Policies

KAEFER Australia operates the following policies and procedures relevant to countering modern slavery:

Policy or Procedure	Description
Code of Business Conduct	The KAEFER Code of Business Conduct defines globally binding principles for the KAEFER Group which are designed to guide our employees to conduct themselves ethically, with integrity and in compliance with all applicable laws and regulations. The KAEFER Code of Business Conduct makes clear to employees the actions and behaviour expected of them when representing the organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating in any capacity as a KAEFER representative and in managing our supply chain.
Modern Slavery Policy	This Policy reflects KAEFER Australia's continuing responsibility to combat slavery. It provides an overview of our actions to understand risks and put in place steps aimed at ensuring that there is no slavery in our own business or our supply chain.
Human Rights and Environmental Protection Policy	This policy statement describes the approach of KAEFER SE & Co. KG and its companies worldwide with regard to Human Rights and is based on the requirements of the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz) and internationally recognised standards. In this way, we ensure that respect for Human Rights and environmental protection is guaranteed within the KAEFER organisation worldwide. Implementation is the responsibility of the management of the individual KAEFER companies. At the same time, we oblige our employees not only to observe the principles laid down in the Code, but also to anchor them in their professional behaviour with conviction and commitment.

Supplier Code of Conduct	The Supplier Code of Conduct sets our expectations for our suppliers to share the same values and meet the standards, we have implemented and live in our company
Business Ethics Policy	This Policy applies to all employees and requires conduct that evidence honesty, integrity and commitment. It is underpinned by a Business Ethics Declaration signed by all employees.
Health and Safety Policy and supporting Management System	KAEFER has in place a comprehensive system for managing H&S risks. Our OHS system is independently audited to ISO 45001 and ISO 14001.
Harassment and Bullying Policy	Sets out the company's zero tolerance to this issue and our commitment to maintaining a workplace culture of respect and dignity.
Freedom of Association Policy	Stipulates our approach to and safeguards for workers exercising their right to freedom of association and associated right to collective bargaining.
Whistle Blowing Program	Mechanism for employees or contractors to raise concerns in a confidential way, without fear of reprisal. We encourage all our workers and partners to report any concerns related to the direct activities or the supply chains of our organisation. This is supported by a KAEFER Compliance Helpline (a web-based electronic whistle-blower system). We are currently working on expanding the scope of our Whistleblowing system and Helpline to expressly include reporting on human rights-related issues. Concerns can be reported anonymously and by any person connected to our supply chain.
Other Policies	In addition, KAEFER Australia operates under various other policies that support our commitment to respecting the human rights and dignity of all our stakeholders in line with our values. These include Anti-corruption Guidelines, Parental Leave and Rehabilitation Policies, and an Indigenous Participation Policy, amongst many others.

All employees are made aware of our policies through our induction and training processes and are expected to adhere to them in carrying out their duties as employees of KAEFER Australia. We also expect our business partners, suppliers and contractors to comply with the KAEFER Code of Business Conduct.

4.3 Supplier Engagement & Management

KAEFER Australia's supply chain management system is based on our global model and can be broken down into five separate phases:

The incorporation of supply chain management guidelines into relevant internal policies and management handbooks as well as guidance to our suppliers through our Supplier Code of Conduct.

To mitigate the risks of modern slavery and human trafficking in our supply chain, KAEFER Australia undertakes due diligence when considering taking on new suppliers or contractors. We also regularly review existing suppliers and subcontractors. A focus area for us will be expanding the lens through which we assess our existing suppliers during our regular reviews, to include more targeted performance review in relation to modern slavery. We anticipate broadening this assessment, including dedicated questionnaires once we have conducted the supply chain risk assessment. This will help us identify priority suppliers, or supplier categories, for initial engagement.

When engaging a new supplier, KAEFER Australia also undertakes investigations into the prospective supplier and issues a questionnaire to each new supplier. This questionnaire collects information on the supplier's Health and safety systems, environmental management systems as well as on the measures the supplier has in force to detect modern slavery within its own business and supply chain. In addition, we conduct supplier background screening (e.g., restricted party lists).

KAEFER Australia's terms with suppliers require each supplier to confirm compliance with the KAEFER Code of Business Conduct. Suppliers are also subject to audit by KAEFER's dedicated audit team. Our approach to supplier management is grounded in collaboration. We want to work with our partners and to that end place strong emphasis on ensuring there are regular touchpoints with our contractors and suppliers throughout project delivery. In tandem with this approach, KAEFER Australia also employs Key Performance Indicators (KPIs), and our partners are subject to regular and post-project reporting and monitoring requirements.

As our systems mature, we anticipate that additional assurance actions will be developed to manage modern slavery risks within our supply chain.

4.4 Training

Every new employee at KAEFER is required to participate in different trainings as part of their on-boarding process. Respective trainings such as the anti-corruption training are carried out via e-learning or in person, they are available in thirteen languages and were developed by KAEFER and tailored to the needs of the learners. This includes e-learning on:

KAEFER Compliance Trainings		
- Code of Business Conduct (e-learning)		Share 97%
Thereof Senior Management		Share 100%
- Code of Business Conduct (offline)		Share 96%
- Anti-Corruption		Share 97%
Thereof Senior Management		Share 100%
- Anti-Trust		Share 93%
Thereof Senior Management		Share 100%
- Conflicts of Interest		Share 96%
Thereof Senior Management		Share 100%
- Fraud Prevention		Share 96%
Thereof Senior Management		Share 100%

Figures relate to employees that have been identified as relevant for participating in the trainings based on an internal assessment.

Senior Management: highest management level, that oversee key strategic decisions. These include, for example, the Chief Executive Officer (CEO)/ Managing Director, Chief Financial Officer (CFO), Chief Operating Officer (COO) on group as well as on local level.

Figure 8: KAEFER Group (global) Compliance Training

Our trainings on business conduct provide our employees with the knowledge to recognise situations of possible corruption and take the necessary steps to avoid it. To mitigate risks related to our dealings with business partners, KAEFER implemented a Business Partner Due Diligence process to get a clearer picture of who our high-risk business partners are and how they operate. The KAEFER Supplier Code of Conduct contains clear requirements for our suppliers to comply with recognised international standards on the prevention of corruption..

KAEFER Australia has not yet conducted formal Modern Slavery training for our workers. However, our procurement team is actively raising awareness across our operations. Our objective is to collaborate with our colleagues and adopt the same or similar learning module to deploy to our workers across Australia. We are also considering the development of focused modern slavery training for key functions, such as procurement staff. This training will be timed to include training on reviewed and updated policies and procedures.

4.5 Collaboration

We recognise that the Modern Slavery Act encourages organisations to work together to identify and combat modern slavery. KAEFER Australia is actively exploring opportunities to collaborate with our peers as well opportunities to partake in global initiatives that are aligned with our sustainability-focus. Our global CRS Department regularly benchmarks our

performance in key sustainability areas against industry practices, and we also conduct stakeholder surveys to gain insights into the concerns of our internal and external stakeholders.

Given the global nature of our organisation, there is rich opportunity for collaboration and innovation within our Group, and this is where we will initially direct our focus. This will include collaborating with our ESG Project Management Office.

5.0 ASSESSING EFFECTIVENESS OF OUR ACTIONS

KAEFER Australia has set a number of targets and objectives for progressive improvement of our counter-slavery response. These are set out in section 6.0 of this Statement and were developed following a strategic and holistic assessment of our current systems and practices. This assessment focused on our governance systems, due diligence systems and practices, supplier management and engagement processes, our policies and training, as well as grievance and remediation systems. In addition, our CRS Department also benchmarks our performance on ESG aspects against industry practices. This also informs our approach to continuous improvement of our counter-slavery response.

The targets and associated KPIs will enable us to track our progress over time. In future statements we intend to report on our progress in meeting the targets we have set ourselves and measuring how we perform year-on-year by key metrics, such as number of grievances received and resolved, trainings conducted and supplier assessment and engagement statistics.

The adoption of KPIs in relation to counter-slavery response is aligned with actions we are implementing as part of our broader sustainability strategy. We have begun to integrate measurable KPIs into our sustainability and ESG approach, and we view the adoption of KPIs and measurable targets as part of our counter-slavery response as an extension of that commitment to track, and continually improve our performance over time in all that we do.

6.0 MODERN SLAVERY ROADMAP: TARGETS

KAEFER Australia is committed to the continuous review and improvement of our counter-slavery systems and practices. To that end, the table below sets out targets and associated KPIs we have set ourselves for the near future.

Topic	Actions and Objectives	Measurement/ KPI	Implementation Time Frame
Assessing Supply Chain Risks	Conducting formal supply chain risk assessment to establish where our supply chain risk exposure is as a foundation for future actions and engagement. This is already underway	All Tier 1 suppliers assessed for modern slavery risk and risk exposure established	Ongoing 2024/2026
	Developing and deploying Supplier Assessment Questionnaire (SAQ) to adjust risk and work towards greater supply chain visibility.	SAQ sent to high-risk existing suppliers based on outcomes of supply chain risk assessment.	2024 / 2025
Management Oversight and Governance	Formalising assignment of accountability as the Management Level	Responsibility and Accountability	2024 / 2025
	ESG Committee – Formed and setting targets	Integrated local and global governance	Ongoing
Supplier Assurance Collaboration and Engagement	Exploring additional avenues for industry collaboration, including through global and regional initiatives (joining the UNGC Modern Slavery Community of Practice?)	Investigating suitable initiatives together with global CRS Department and ESG Project Management Office	Completed Regular ESG committee meetings globally
Contracts Training Policies	Conducting employee training on modern slavery issues, risks, and mitigations.	Generic training including in all induction processes.	2025

	Conducting employee training on modern slavery issues, risks, and mitigations.	100% of new team members trained	Ongoing
	Investigating the process for updating and expanding KAEFER Group's policy suite to include specific language and controls around modern slavery, beginning with the adoption of our Supplier Code of Conduct (already underway). This will take place through our global sustainability team in collaboration with KAEFER Australia.	Development of specialised training module for key team members (eg procurement)	
		100% of procurement team members trained.	Ongoing
	Updating our Whistle-Blower Policy and Procedure to include modern slavery and practices indicative of modern slavery as a reportable issue for our workers.	Whistle-Blower Policy update and Helpline expanded Number of modern slavery grievances received Percentage of grievances resolved	Ongoing

7.0 CONSULTATION

During the reporting period covered by this Statement, KAEFER Australia actively engaged with the companies we own or control in the development of this Statement. This is facilitated by the fact that as a group, the companies in Australia are managed as an integrated organisation, with common Directors across the reporting entity and the entities we own and control. This means that there is shared awareness amongst the relevant entities of the modern slavery risks and current due diligence and anti-slavery response systems and processes. It also means our targets for future action to further improve those systems and practices as described in our Statement are clear and transparent across the group. All systems and procedures apply equally across our reporting entity and the entities we own and control.

8.0 APPROVAL

This statement was approved by the Board of Directors of KAEFER Integrated Services Pty Ltd, the principal governing body of the reporting entity, on 26 June 2024.



Wei Goh

Director

30/06/2025