



Modern Slavery Statement 2020



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This *Modern Slavery Statement* (Statement) is for the financial year ended 30 June 2020 (FY20) and has been prepared as a joint statement for Macmahon Holdings Limited (Macmahon) ACN 007 634 406 and the entities referred to on page 7 of the Statement as required under the *Modern Slavery Act 2018 (Cth)*. This Statement was approved by the Macmahon Board of Directors on 18th February 2021. This Statement covers the activities of Macmahon Holdings Limited, its subsidiaries and its controlled entities. In this Statement, the terms 'Macmahon', 'Company', 'our business', 'we' and 'our' refer to Macmahon Holdings

Limited, its subsidiaries and its controlled entities except where stated or where the context otherwise requires.

This Statement was prepared by Macmahon based on information available to it at the time of preparation. This Statement contains forward-looking statements and commitments that may involve known and unknown risks, uncertainties, assumptions and other factors that could cause the actual outcomes to be materially different from the events or results expressed or implied by such statements and commitments, and the outcomes may not all

be within Macmahon's control.

This Statement should be read in conjunction with Macmahon's other periodic and continuous disclosure announcements lodged with the Australian Securities Exchange (ASX), including the FY20 *Annual Report* and FY20 *Corporate Governance Statement*, which are available at macmahon.com.au.

Overview

Macmahon Holdings Limited (Macmahon) is an Australian Securities Exchange (ASX) listed company that has been offering mining and construction services to clients for more than 55 years. We are a trusted partner on resources projects throughout Australia and internationally.

Macmahon recognises that it has a responsibility under the *Modern Slavery Act 2018 (Cth)* to report annually on the risks of modern slavery in its operations and supply chains, and on actions to address those risks. Modern slavery is unacceptable within our operations and supply chain. We are committed to working in collaboration with our employees, suppliers, government and all other relevant stakeholders to tackle this challenge.

As part of our response to modern slavery over FY20 we:

- Reviewed existing Company policies and adopted a new *Human Rights Policy* – we are committed to eliminating all forms of modern slavery in our operations and supply chain;
- Conducted due diligence on our global and local supply chains;
- Updated 'slavery and forced labour' clauses in a number of our supplier contract templates to recognise the *Modern Slavery Act*

2018 (Cth). This requires agents, suppliers and service providers to respond and demonstrate compliance with the legislation and to report any breaches of the Act or instances of modern slavery to Macmahon. The updated contract terms permit Macmahon to undertake an audit of a supplier or service provider's operations for compliance with modern slavery legislation. We aim to roll out the updated contract terms across all our remaining supplier contract templates in FY21;

- Commenced planning for the development of an online training module for our staff in modern slavery legislation and associated requirements – especially for our staff involved with procurement and operational aspects of our business; and
- Monitored and reported on progress against actions in our *Modern Slavery Action Plan* for FY20 and developed a *Modern Slavery Action Plan* for FY21.



Macmahon has a responsibility to report annually on the risks of modern slavery in its operations and supply chains, and on actions to address those risks.



Statement from the Chair and CEO & MD

In our first *Modern Slavery Statement* under the *Modern Slavery Act 2018 (Cth)*, we are pleased to set out how we are assessing modern slavery risks related to our business and supply chains and the initial actions that we have put in place to address modern slavery.

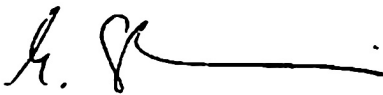
We have adopted a new *Human Rights Policy* setting out our commitment to eliminate all forms of modern slavery in our operations and supply chains. We respect internationally recognised human rights principles and support the overarching proposition that all businesses have a role to play in eliminating modern slavery.

Through FY20, we have undertaken due diligence activities to identify, address, mitigate and prevent human rights and modern slavery impacts from our

operations and supply chains. This included a supplier risk assessment, supplier questionnaires and updating contracting procedures to address the risks of modern slavery within our operations and supply chain.

Whilst we have made some progress through FY20, we recognise that eliminating all forms of modern slavery is a significant process, however, we remain committed in our approach. We have a plan in place for continuing and deepening our response to modern slavery into the future.

This Statement has been approved by the Macmahon Board of Directors on 18th February 2021 on behalf of itself and the other reporting entities listed on page 8 of this statement.



EVA SKIRA
Independent Non-Executive Chair



MICHAEL FINNEGAN
Chief Executive Officer
and Managing Director



We have undertaken due diligence activities to identify, address, mitigate and prevent human rights and modern slavery impacts.



Macmahon is an ASX listed company that offers mining and construction services to clients throughout Australia and internationally.



About Macmahon

OUR BUSINESS

Macmahon is an ASX listed company that offers mining and construction services to clients throughout Australia and internationally. Our approach to doing business, together with our capabilities in surface and underground mining, civil design and construction, performance enhancement, and mine site maintenance and rehabilitation services, has established Macmahon as a trusted partner on resources projects.

OUR VISION

To be the preferred contracting and services company: for employees to work for; for customers to use; and for shareholders to invest in.

OUR VALUES

Our values encompassing **Safety**, **Teamwork**, **Prosperity**, **Integrity** and **Environment** make it clear to our employees the actions and behaviours expected of them when representing Macmahon. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating in Australia and abroad and in managing our supply chains.

SAFETY

Think Safe • Act Safe • Enforce Safety

TEAMWORK

Work Smart • Work Hard • Work Together

PROSPERITY

Find Value • Drive Value • Achieve Value

INTEGRITY

Be Reliable • Be Direct • Be Honest

ENVIRONMENT

Reduce • Recycle • Rejuvenate

THE REPORTING ENTITY

This Modern Slavery Statement is made in accordance with the *Modern Slavery Act 2018 (Cth)* for the period 1 July 2019 to 30 June 2020. This is a joint Statement made on behalf of the following entities ("Reporting Entities"):

- Macmahon Holdings Limited (ACN 007 634 406);
- Macmahon Contractors Pty Ltd (ACN 007 611 485);
- GF Holdings (WA) Pty Ltd (ACN 009 330 652); and
- GBF Mining and Industrial Services Pty Ltd (ACN 133 767 807)

This Statement captures the activities of Macmahon Holdings Limited, its subsidiaries and all its controlled entities. Macmahon Holdings Limited is an Australian mining contracting company headquartered in Perth, Western Australia, and listed on the ASX (ASX:MAH) and is the ultimate holding company in the Macmahon Group of companies. Macmahon Contractors Pty Ltd is the holding company of many of our controlled entities (including overseas controlled entities). A breakdown of the Macmahon corporate group is set out on page 8 of this Statement and can be found on page 107 of our Annual Report for FY20.

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Our structure

Our Company structure including associated and subsidiary companies is shown below. On 2 August 2019, Macmahon acquired 100% of the voting shares of GF Holdings (WA) Pty Ltd and its subsidiaries (GBF Underground Mining Group), a private company located in Western Australia that specialises in the provision of underground mining services.

Incorporated subsidiaries	Country of incorporation	Ownership interest	ACN / Company Number
Macmahon Contractors Pty Ltd	Australia	100%	007 611 485
Macmahon Mining Services Pty Ltd	Australia	100%	120 810 568
Doorn-Djil Yoordaning Mining and Construction Pty Ltd	Australia	100%	131 646 494
Macmahon Underground Pty Ltd	Australia	100%	003 696 464
Macmahon Contracting International Pte Ltd	Singapore	100%	200704097Z
PT Macmahon Indonesia	Indonesia	100%	02.648.378.4-063.000
Macmahon Constructors Sdn Bhd	Malaysia	100%	199301021764 (276502-P)
TMM Group Pty Ltd	Australia	100%	144 521 700
TMM Group (Consult) Pty Ltd	Australia	100%	149 312 587
TMM Group (IP) Pty Ltd	Australia	100%	149 312 578
TMM Group (Operations) Pty Ltd	Australia	100%	149 312 603
Windsor Earthmoving Contractors Pty Ltd	Australia	100%	083 020 964
Macmahon Maintenance Masters Pty Ltd (2019: Lycullin Equipment Hire Pty Ltd)	Australia	100%	126 211 158
Macmahon Contractors (WA) Pty Ltd*	Australia	100%	008 715 697
Macmahon (Southern) Pty Ltd	Australia	100%	008 160 656
Macmahon Africa Pty Ltd*	Australia	100%	010 630 510
Macmahon Malaysia Pty Ltd*	Australia	100%	007 751 733
Macmahon Sdn Bhd	Malaysia	100%	199301017475 (272213-T)
PT Macmahon Contractors Indonesia	Indonesia	100%	02.648.378.4-063.000
Macmahon Singapore Pte Ltd*	Singapore	100%	201718005M
Progressive Services Mongolia Pte Ltd*	Singapore	100%	201134669H
Reactionary Services LLC*	Mongolia	100%	590774
Macmahon Contractors Nigeria Ltd*	Nigeria	100%	850913
Macmahon Contractors Ghana Limited*	Ghana	100%	CS157872013
Macmahon Botswana (Pty) Ltd*	Botswana	100%	C02014/13961
Strong Minds Strong Mines Pty Ltd	Australia	100%	637 847 502
GF Holdings (WA) Pty Ltd**	Australia	100%	009 330 652
GBF Mining and Industrial Services Pty Ltd**	Australia	100%	133 767 807
GBF North Pty Ltd**	Australia	100%	127 953 520
GBF Number 3 Pty Ltd**	Australia	100%	165 984 234
GBF Number 4 Pty Ltd**	Australia	100%	165 984 289
GBF Number 5 Pty Ltd**	Australia	100%	601 374 029
GBF Number 6 Pty Ltd**	Australia	100%	622 542 250
RAMEX Services Pty Ltd**	Australia	100%	166 387 239
GBF Project Services S.R.O**	Slovakia	100%	51 309 599
Interest in trusts			
Macmahon Holdings Limited Employee Share Ownership Plans Trust	Australia	100%	
Macmahon Underground Unit Trust	Australia	100%	
Interests in Joint Ventures			
PT Macmahon Mining Services	Indonesia	50%	72.411.203.2-064.000
PT Macmahon Labour Services [‡]	Indonesia	49%	95.490.577.4-012.000

* Entities were inactive for the financial year ended 30 June 2020.

** On 2 August 2019, the Group acquired 100% of the voting shares of GF Holdings (WA) Pty Ltd and its subsidiaries. Refer to note 32 in the Group's Annual Report 2020 for further details.

[‡] Entity incorporated on 27 July 2020.



Our operations

Macmahon provides mining and infrastructure services to miners throughout Australia and internationally. While we have significant operations in Australia, our largest project is in Indonesia and we also have projects in South Africa and Malaysia.

We generate revenue from operations and activities including surface and underground mining, civil design and construction (primarily on mine sites), equipment repair and maintenance, advisory services, design and fabrication of mining infrastructure, and mine site maintenance and rehabilitation services.

Offices

- 1 Perth
- 2 Brisbane
- 3 Jakarta
- 4 Kalgoorlie

Workshops

- 1 Perth
- 4 Boulder
- 5 Coppabella
- 6 Lonsdale

Surface Mining

- 7 Argyle
- 8 Batu Hijau
- 9 Byerwen
- 10 Coburn
- 11 Kanthan
- 12 Langkawi
- 13 Lhoknga
- 14 Martabe
- 15 Mt Marven
- 16 Mt Morgans
- 17 Telfer
- 18 Tropicana

TMM Group

- 19 Peak Downs
- 20 Poitrel Levee
- 21 Saraji

Performance Enhancement

- 22 Mogalakwena

Underground Mining / Services

- 23 Ballarat
- 24 Boston Shaker
- 25 Fosterville
- 26 Granny Smith
- 27 Leinster
- 28 Olympic Dam
- 29 Tanami
- 30 Tujuh Bukit

GBF Underground

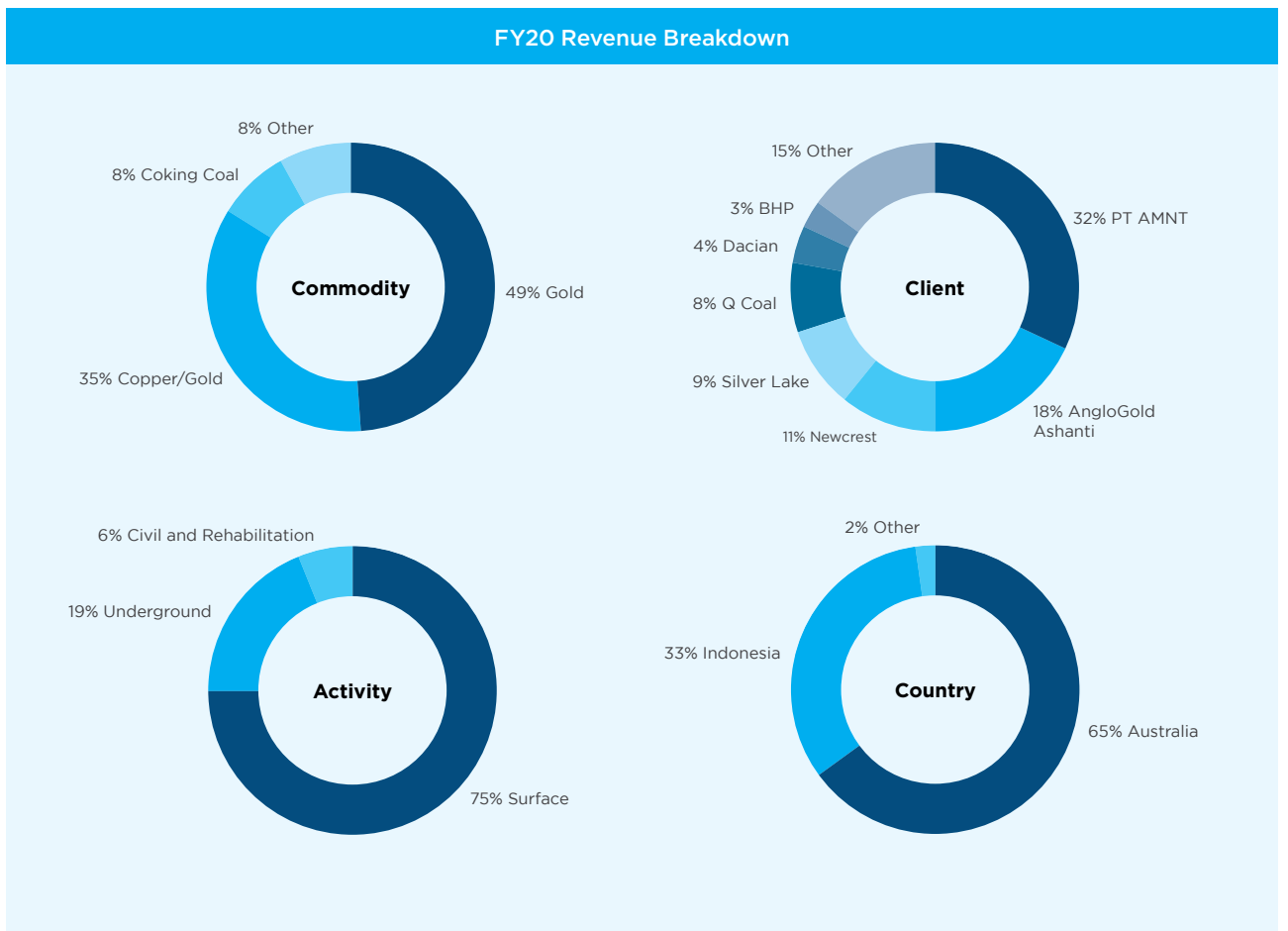
- 31 Cock-eyed Bob
- 32 Comet Vale
- 33 Daisy Milano
- 34 Deflector
- 35 Maxwells
- 36 Nicolsons
- 37 Santa

Our people

Our people are essential to Macmahon’s long term success. Our workforce at the end of June 2020 was 7,059 people. This was an increase of 27% on FY19 due to ongoing organic growth and the addition of 452 GBF employees. Almost 55% of our total workforce is based in Southeast Asia with around 45% in Australia.

Workforce by location

	Employees	Contractors	Total Workforce
Australia	2,351	822	3,173
Indonesia	2,823	1,005	3,828
Malaysia	32	3	35
South Africa	23	0	23
Please Note: South African workforce relates to expats performing consultancy work			
Total	5,229	1,830	7,059

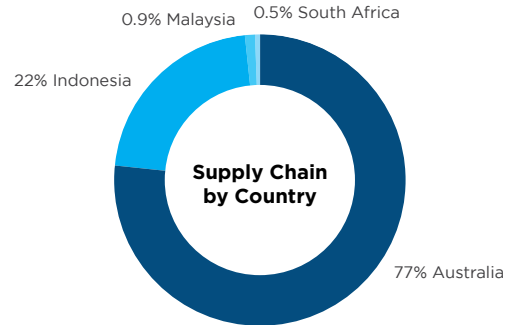


Our supply chain

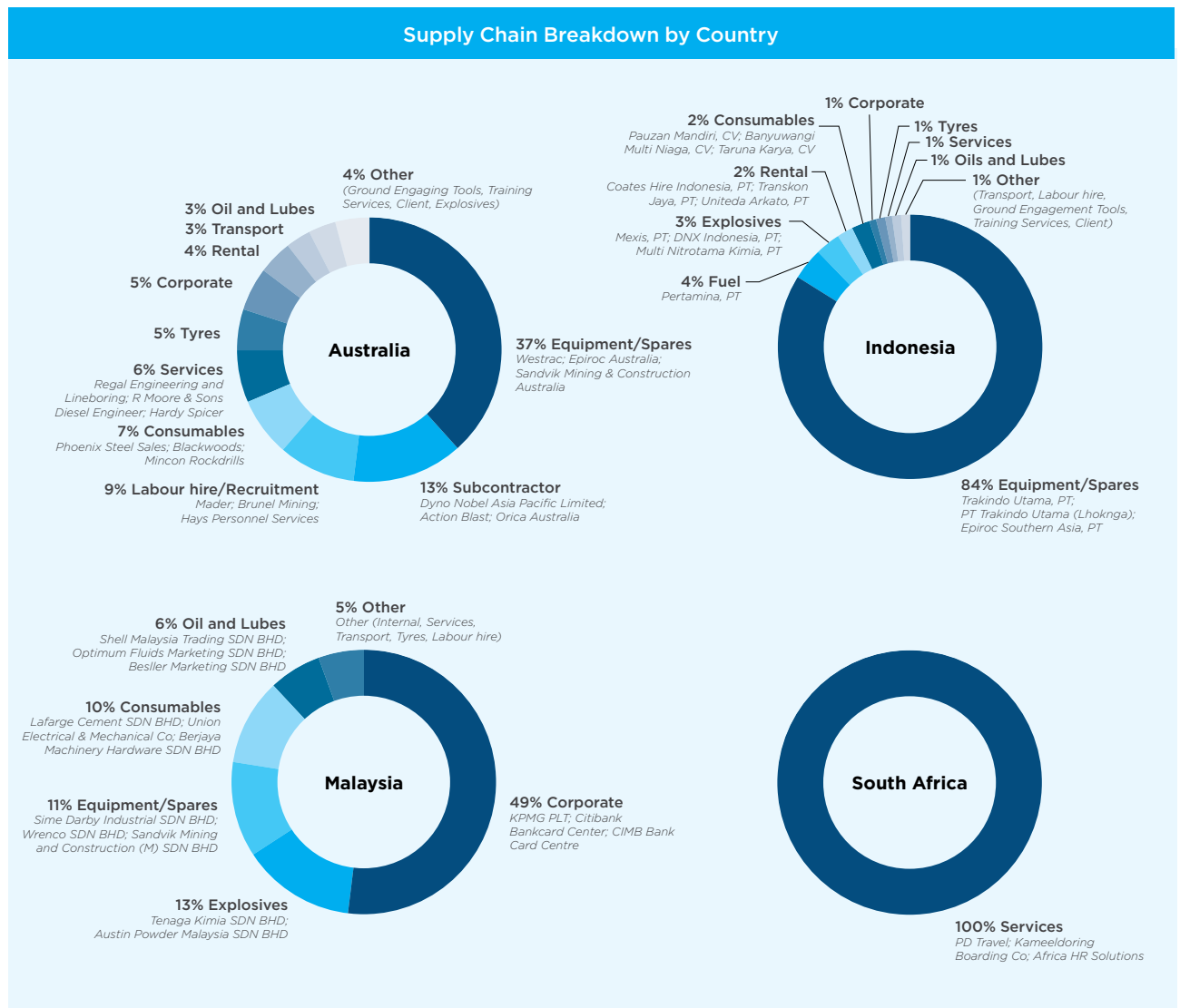
In FY20, reflecting our operations, our supply chains were predominantly based within Australia, Indonesia, South Africa and Malaysia.

Our supply chains include the following services and products:

- Accommodation
- Equipment and Spares
- Consumables
- Corporate Services
- Energy
- Explosives
- Facilities
- Finance
- Freight
- Fuel
- Hire and Rental Goods
- Human Resources (HR)
- Labour Hire
- Oil and Lubes
- Services
- Tyres



We have around 2,000 registered suppliers and have surveyed 175 suppliers which includes our tier one suppliers (our “top 80% of spend”). A breakdown of our FY20 spend is shown below. Over 64% of our supply spend is on equipment and spares, such as specialised machinery, and on sub contractors and labour hire/recruitment.





Modern slavery risks

Recent Australian mining and human rights guidance indicates that “for many mining companies operating in Australia, the most significant modern slavery risks, including during the COVID-19 pandemic, are likely to be in the supply chain.”¹

Key modern slavery risks for Macmahon include:

Risk Category	Risk Description
Supply chain management risks	<ul style="list-style-type: none"> Supplier does not have a policy or process that prohibits modern slavery in its operations and in those of its suppliers Supplier does not have policies and processes to identify, investigate and remedy risk and instances of modern slavery Supplier cannot demonstrate employee training to manage modern slavery risk Supplier does not conduct due diligence for modern slavery risks on its suppliers Supplier does not require suppliers to conduct due diligence for modern slavery on their suppliers Supplier has not participated in Macmahon’s Modern Slavery Self-Assessment (Survey)
Supply chain labour risks	<ul style="list-style-type: none"> Supplier is in contravention of the United Nations International Labour Organisation (ILO) conventions that prohibit the worst forms of child labour Supplier does not undertake checks to ensure child labour is not being used within its organisation or suppliers Supplier cannot demonstrate compliance to decent work principles or the <i>Fair Work Act 2009 (Cth)</i> Supplier does not have mechanisms available to anonymously raise concerns related to labour conditions or workplace grievances
Supply chain goods risks	<ul style="list-style-type: none"> Supplier has a facility (or facilities) in locations identified as ‘high risk’ Supplier provides goods/materials or services identified as ‘high risk’

In FY20, we procured \$760M AUD in goods and services from 2,000 suppliers spread across 4 countries. Of these, approximately 352 (17.6%) suppliers were identified as being located in high risk countries in reference to the Global Slavery Index.

We have also identified that the following goods and services, as being higher risk for modern slavery, based on country risks (e.g. goods produced in countries with higher prevalence of modern slavery) and sector risks (e.g. use of low skilled labour, migrant workers, reliance on third party labour hire):

- Personal Protective Equipment (PPE)
- Information Technology (IT)
- Accommodation
- Travel

We also acknowledge that goods that we acquire from our direct suppliers may have ultimately been manufactured in jurisdictions that are higher risk for modern slavery. For example, personal protective equipment (PPE) or materials used to produce PPE, that we source from our suppliers may have been produced in high risk countries.

In FY20, we requested 175 suppliers which included our tier one suppliers to complete a modern slavery self assessment as part of our risk assessment process. We received 84 supplier responses (48%) by 30 June 2020 and will review all responses in FY21.

Risks in our operations

Given that a significant part of our operations is in Indonesia, a country which is reported to have a high prevalence of modern slavery by international organisations, we recognise that there is a risk we may cause or contribute to modern slavery practices. However, we have contracts, conditions and procedures in place with our Indonesian labour force to respond to these risks (see page 15 “Managing risk in our Indonesian operations”).

¹ Minerals Council of Australia and Pillar Two, 2020, *Respecting human rights, Guidance to assist mining companies to identify and manage modern slavery risks associated with the COVID-19 pandemic.* (https://minerals.org.au/sites/default/files/Respecting%20human%20rights_Modern_Slavery_Oct%202020.pdf)

Actions to assess and address modern slavery risks

Various actions have been undertaken in response to our modern slavery risks as outlined below:

GOVERNANCE AND MANAGEMENT

We respect internationally recognised human rights principles. We have a *Human Rights Policy* in addition to human rights commitments in our *Code of Conduct* and other corporate policies (see below). These policies are all publicly available on our website.

Our General Manager Plant and Maintenance leads our response to modern slavery requirements.

We intend to establish a *Modern Slavery Working Group* to maintain oversight and coordinate various actions on modern slavery across the Company. The *Modern Slavery Working Group* will have members drawn from our Supply, Health, Safety, Environment and Quality (HSEQ), Legal and Commercial teams.

OUR POLICIES AND PROCEDURES

A framework of Company policies and procedures helps us to uphold human rights and assess and manage modern slavery risks in our operations and supply chains.

In FY20, we revised and adopted a new *Human Rights Policy* that outlines our commitment to eliminate all forms of modern slavery in our operations and supply chains. We reject the use of all forms of slavery, forced labour, including prison, indentured, bonded or military labour, child labour, forced marriage, any form of human trafficking and deceptive recruiting for labour or services.

Through our *Procurement Policy*, we are committed to conducting purchasing activities in a fair, objective and transparent manner that satisfies the requirements of accountability and internal controls. Emphasis is placed on selecting suppliers and service providers that demonstrate recognisable environmental, sustainability and business integrity standards including respect for human rights.

Our *Whistleblower Policy* is designed to make it easy for employees and others to make disclosures, without fear of retaliation. We encourage all our employees, customers and business partners to report any modern slavery concerns related to our direct activities or our supply chains. This includes any circumstances that may give rise to an enhanced risk of modern slavery or human trafficking.

Macmahon policies and programs

Key policies and programs that address human rights and modern slavery include our:

- *Code of Conduct*
- *Environmental Policy*
- *Equal Employment and Diversity Policy*
- *Human Rights Policy*
- *Indigenous Peoples Policy*
- *Procurement Policy*
- *Safety and Health Policy*
- *Whistleblower Policy* and 'whistleblower hotline'

SUPPLY CHAIN DUE DILIGENCE AND RISK ASSESSMENT

Through FY20, we undertook due diligence activities to identify, address, mitigate and prevent human rights impacts from our operations and supply chains through our procurement practices and contractual arrangements.

A due diligence process is conducted for each new supplier as part of a 'new supplier' set up process. This includes assessing a new supplier's response to:

- Our Human Rights Policy relating to modern slavery
- Financial capability
- Insurance documentation
- Human resources and Industrial relations information relating to claims against the company
- HSEQ statistics
- Accreditations, certifications and management systems.

This assessment is then reviewed and approved by Macmahon key stakeholders and Supply Manager to ensure compliance.

As part of our International Organization for Standardization (ISO) requirements, through our supplier prequalification process, we also undertake re-qualifications across our existing supplier base every two years.

In addition, we are investigating the development of a reporting capability to the supplier database which will allow us to filter suppliers flagged as 'high risk', and undertake checks on a case by case basis in a more efficient manner.

SUPPLY CHAIN MANAGEMENT

As a condition of doing business with us, our suppliers are required to comply with our policies and procedures. For several years, the Company's supplier contract templates have had a 'Slavery and forced labour' clause requiring agents, suppliers and service providers to respond to modern slavery risks. In FY20, we updated these clauses in a number of our supplier contract templates to be consistent with the *Modern Slavery Act 2018 (Cth)* and remaining supplier contract templates will be updated in FY21.

These contractual arrangements require that agents, suppliers and service providers undertake various actions in relation to modern slavery including:

- Conducting their business in a manner that is consistent with the *Modern Slavery Act 2018 (Cth)*
- Investigating their own supply chains and labour practices
- Permitting Macmahon to audit their operations to ensure there is no form of modern slavery within such operations
- Putting in place and maintaining all necessary processes, procedures, investigations and compliance systems
- Maintaining a complete set of records to trace the supply chain
- Notifying Macmahon if they become aware of any actual or suspected slavery, forced labour or human trafficking in a supply chain in connection with our agreements

MANAGING RISK IN OUR INDONESIAN OPERATIONS

We comply with all relevant Indonesian labour legislation and provide written contracts underpinned by Company Regulations (similar to an Australian Enterprise Agreement) that are approved by the Indonesian Government's Ministry of Manpower. We must update and seek approval from the Ministry of Manpower for new Company Regulations every two years.

We participate in a Mercer salary survey for Indonesia to ensure that we are correctly positioned within the market for like roles within the mining industry. We seek to position ourselves in the middle of the market, however, we will pay higher for key roles (particularly professionals and highly skilled operators). In addition, we monitor the minimum wage rate for the

particular Regency (or area) in which we operate, and we ensure that we pay above the minimum wage for our lowest paid labourers.

Our Indonesian workers also participate in production bonuses (linked to KPIs, including for safety, damage, etc.), which are over and above the basic wage. We provide health insurance for all employees and family (1x spouse and up to 3 children).

Our Indonesian workforce standard roster is 4 weeks on 2 weeks off and a 12-hour shift. Depending on whether or not an employee lives within the local community or is a fly-in-fly-out (FIFO) worker, some roles within the local community will work 5 days on 2 days off and 8 hours per day. The same 'fatigue management' policies and procedure apply to our Indonesian workforce as to our Australian workforce.

TRAINING AND EDUCATION

In FY20 we commenced planning for the development of an online training module on modern slavery for our employees, which will include:

- The basic principles of the *Modern Slavery Act 2018 (Cth)*
- How employees can identify and prevent modern slavery and human trafficking
- What employees can do to 'flag' potential modern slavery and human trafficking issues to relevant parties within the Company
- What external help is available to identify and prevent modern slavery

We will develop the module and roll out the training in FY21. The module will also be translated and made available for our South African, Indonesian and Malaysian staff.

All employees are required to complete Modern Slavery awareness training in their induction program and annually thereafter. Automatic training notifications and 'due dates for completion' are sent to our employees to ensure that 'learning plans' are kept up to date.

Safety performance of our Indonesian workforce

Safety performance at our Indonesian operations compares positively to our Australian operations.

	Macmahon Holdings	Macmahon - Australia	Macmahon - Indonesia
LTIFR	0.12	0.17	0.10
TRIFR	3.77	7.65	1.63

LTIFR - Lost Time Injury Frequency Rate
TRIFR - Total Recordable Injury Frequency Rate

Assessing effectiveness

We are setting up a process to assess and measure the effectiveness of our actions to combat modern slavery through performance monitoring. We anticipate this will include:

- Regularly checking our risk assessment processes to ensure they are appropriate
- Working with suppliers to check how they are progressing any actions they have put in place to address modern slavery risks

- Establishing a future *Modern Slavery Working Group* with members drawn from our Supply, HSEQ, Legal and Commercial teams to enable and support engagement and feedback across Macmahon
- Monitoring progress with our actions and commitments and reporting internally on risk assessment outcomes and required actions

Our performance against our actions and commitments will continue to be assessed and reported in our annual *Modern Slavery Statement*.

Our key governance principles, policies and practices are reviewed regularly and updated as appropriate to reflect changes in law and developments in corporate governance. In FY20 for example, we reviewed and adopted a new *Human Rights Policy*. Risk management policies and systems including those for supply chain risks are also reviewed annually to reflect changes in market conditions, our activities and supply chains.

Consultation with our entities

Identification and implementation of actions to assess and manage our modern slavery risks continues to involve consultation and engagement across Macmahon including with our associated and subsidiary companies. Our future *Modern Slavery Working Group* teams will be a key mechanism that enables and supports ongoing consultation.

Through FY20, examples of our consultation include engaging with:

- Our Investor Relations and Sustainability specialists on the interests to our investors and other stakeholders
- Our Macmahon Indonesia team regarding local suppliers and modern slavery risks (also how these risks may have changed because of the COVID-19 pandemic)
- Our Human Resources and HSEQ teams on development and use of our modern slavery *Risk Assessment Tool*

Our Executive Management Team and the Macmahon Board of Directors have been regularly briefed on modern slavery regulatory requirements, our risks and responses including this *Modern Slavery Statement*.

Our Executive Management Team and the Macmahon Board of Directors have been regularly briefed on modern slavery regulatory requirements, our risks and our responses.



Our roadmap

We have made progress on responding to the *Modern Slavery Act 2018 (Cth)* but understand that this is an ongoing commitment and more action is required.

As part of our FY21 and ongoing roadmap, we will:

Risk assessment

1. Establish a more efficient and robust process for assessing modern slavery risks within our supply chains
2. Follow up on any non-responding suppliers to our modern slavery self-assessment
3. Assess modern slavery risks of our suppliers
4. Develop a corrective action process with suppliers and coach suppliers on corrective actions in response to any modern slavery risks

Supply chain management

5. Complete variations to include modern slavery responsibilities in supplier contracts
6. Develop and 'roll out' a *Supplier Code of Conduct* including reference to upholding human rights and preventing modern slavery
7. Undertake supplier audits as part of Macmahon HSEQ visits to a supplier's place of business for one-on-one discussions on how to improve compliance with modern slavery laws
8. Review supplier responses and discuss improvements during our quarterly supplier review meetings
9. Investigate, review and implement a supplier compliance and onboarding system
10. Continue to develop a Modern Slavery Framework for assessing Indonesian, South African and Malaysian Supplier Base

Policy and procedures

11. Update Procurement Policy
12. Develop an agreed internal procedure for how we will respond to any modern slavery concerns or issues that might arise

Coordination

13. Identify key stakeholders and consultants to establish a *Modern Slavery Working Group*

Training

14. Develop an online training module and provide training for our staff in modern slavery legislation – especially for staff involved with procurement and operational aspects of our business





MACMAHON

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