

# Modern Slavery Statement 2022

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# Introduction

Monadelphous Group Limited (ACN 008 988 547) is an Australian company, publicly listed on the Australian Securities Exchange (ASX:MND), registered at 59 Albany Highway, Victoria Park, Western Australia, 6100, Australia.

This statement has been developed in accordance with the requirements of the Australian Modern Slavery Act 2018 (Cth), and sets out the actions taken by Monadelphous Group Limited and its wholly owned and controlled entities (referred to collectively in this statement as 'Monadelphous', the 'Group', the 'Company') to identify, assess and address modern slavery risks in its operations and supply chain.

Modern slavery involves grave abuses of human rights and serious crimes. It includes human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.

This is Monadelphous' third Modern Slavery Statement. It outlines the Company's governance, processes and activities undertaken during the year ended 30 June 2022. References in this report to 'year' or 'period' refer to the financial year ended 30 June 2022, unless otherwise stated.

## Overview

Modern slavery remains a global issue, affecting approximately 50 million victims around the world (2021 Global Estimates of Modern Slavery by the International Labour Organization (ILO), Walk Free and the International Organization for Migration (IOM)). The Company operates within a number of countries with a higher inherent risk for modern slavery, and with a global supply chain, is cognisant of its objective to not cause or contribute to modern slavery through its operations and business dealings.

Monadelphous respects the human rights of every person involved in its operations, supply chain and the communities in which it operates. It does not accept any form of modern slavery in the conduct of its operations and in its supply chain and is committed to ensuring that all workers are treated fairly, ethically and with respect.

Monadelphous has a modern slavery framework, aligned to the Group's risk management framework, which describes the policies, processes and tools in place to prevent, detect and respond to incidents of modern slavery and human rights abuses in its operations and supply chain.

Monadelphous' greatest risk exposure to modern slavery continues to be its supply chain. The Company takes a risk based approach to managing these risks, and during

the year further refined its modern slavery framework, associated processes and tools. Supplier onboarding and periodic assessment processes were enhanced, applying new management technologies to improve supplier risk identification and due diligence assessments. The Company continued to engage with its direct supply chain, undertaking detailed onsite capability assessments for a number of key suppliers, inclusive of labour rights and working conditions criteria. Additionally, modern slavery awareness training continued to be delivered to all Company employees, with specific training provided to employees operating in geographies or sectors with an elevated risk of modern slavery.

### Key activities undertaken during the year ended 30 June 2022:

- Modern slavery framework and associated processes independently reviewed to assess effectiveness in identifying and addressing risk
- Implementation of an online system for supplier modern slavery self-assessment questionnaires
- Modern slavery and working conditions assessment criteria incorporated into existing onsite supplier capability assessment processes
- Completion of onsite modern slavery assessments for a number of high-risk, high-volume suppliers
- Code of Conduct training enhanced to reinforce the Company's acceptable workplace behaviour standards

Monadelphous recognises that continual improvement is key to reducing the risk of modern slavery. The Company maintains a roadmap outlining the actions required to ensure ongoing improvement in identifying, assessing and addressing the risks of modern slavery. During the year, the Company made good progress against its planned activities.

To date, the Company has not identified any instances of modern slavery in its operations or supply chain.

## Structure, operations and supply chain

Monadelphous is an Australian engineering group headquartered in Perth, Western Australia, providing construction, maintenance and industrial services to the resources, energy and infrastructure sectors.

The Company builds, maintains and improves its customers' operations through safe, reliable, innovative and cost-effective service solutions. The Company aims to be recognised as a leader in its chosen markets and a truly great company to work for, work with and invest in.

### Structure and operations

Monadelphous has two operating divisions, Engineering Construction and Maintenance and Industrial Services, which undertake works predominantly in Australia, with overseas operations in China, Papua New Guinea, Mongolia, the Philippines and Chile.

The Company operates from major offices in Perth and Brisbane, with regional offices in Sydney, Newcastle, Beijing (China), Ulaanbaatar (Mongolia), Manila (Philippines) and Santiago (Chile), and a network of workshop facilities in Kalgoorlie, Karratha, Port Hedland, Newman, Tom Price, Darwin, Roxby Downs, Whyalla, Gladstone, Hunter Valley, Mackay, Bibra Lake, Capel, Bunbury, Chinchilla, Rutherford, Calama (Chile), Antofagasta (Chile), Rancagua (Chile) and Tianjin (China).

At 30 June 2022, Monadelphous directly employed 7,541 employees and had a total workforce, including subcontractors, of 7,977.

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This statement applies to Monadelphous Group Limited (ultimate holding company), its wholly owned entities and the entities it controls. Refer to Appendix A for a listing of these entities as at 30 June 2022.

### Engineering Construction

The Engineering Construction division provides large-scale multidisciplinary project management and construction services. These include fabrication, modularisation, procurement and installation of structural steel, tankage, mechanical and process equipment, piping, commissioning, demolition, heavy lift, electrical and instrumentation, and engineering procurement and construction services.

### Maintenance and Industrial Services

The Maintenance and Industrial Services division specialises in the planning, management and execution of mechanical and electrical maintenance services, shutdowns, sustaining capital works, fixed plant maintenance services, access solutions, specialist coatings and rail maintenance services.





## Supply chain

Monadelphous operates in diverse markets with a global supply chain. At 30 June 2022, the Company maintained a supplier database of over 4,700 suppliers, with the majority (in excess of 90 per cent) of its annual supplier spend of approximately \$600 million occurring with suppliers and subcontractors located in Australia. Other countries with significant spend included Papua New Guinea, China, Chile, the Philippines and Mongolia.

The Company sources a diverse range of goods and services. The top categories of supply by spend for the year ended 30 June 2022 were:

- Construction materials and consumables
- Workforce labour hire
- Transportation and freight
- Professional engineering services
- Travel

The following identifies the primary overseas countries from which Monadelphous sources goods and services and the main categories of goods and services.

### Papua New Guinea

- Engineering consultancy and design
- Workforce labour hire
- Construction materials and consumables
- Travel and accommodation

### China

- Construction materials and consumables:
  - Steel
  - Piping
- Freight
- Plant and equipment
- Travel and accommodation

### Chile

- Plant and equipment
- Mechanical equipment
- Transportation
- Construction materials and consumables

### Philippines

- Human resources – outsourced services

The Company prefers to undertake business with prequalified suppliers operating under negotiated subcontracts and procurement terms and conditions. During the period, approximately 97 per cent of its supplier spend was under negotiated subcontract agreements and Company procurement terms and conditions.

## Identifying risks of modern slavery

### Operations

The majority of Monadelphous' employees are employed directly under permanent, fixed-term, part-time or casual contracts, or under enterprise bargaining agreements, which significantly lowers the risk of modern slavery. Company employment contracts meet or exceed the applicable employment legislation in the countries in which the Company operates.

The Company acknowledges that some parts of its operations utilise labour through third party providers and subcontractors and it may or may not have direct supervision over these third party workforces and transparency of their terms and conditions of employment. The Company has assessed the risk of modern slavery occurring to be greater for labour suppliers that operate in geographies and industries with a higher prevalence of modern slavery.

The following areas of the business have been identified as those which have a greater potential to cause or contribute to modern slavery practices due to their use of labour providers and subcontractors in high risk geographies and industries (by reference to the Global Slavery Index).

Operation (relevant wholly owned and controlled entities)	Description of services
Papua New Guinea operations (Monadelphous PNG Ltd)	Provider of construction and industrial maintenance services in the Papua New Guinea minerals and oil and gas industries utilising local subcontractor service providers.
China operations (Inteforge Pty Ltd (formerly known as SinoStruct Pty Ltd), Moway AustAsia Steel Structures Trading (Beijing) Company Limited, SinoStruct Engineering & Fabrication (Tianjin) Co. Ltd)	Provider of industrial fabrication management services, operating with a range of preferred manufacturing subcontractors located in China.
Outsourced services in the Philippines (subcontract agreement)	Outsourced professional services are provided to Monadelphous through partnerships with Filipino outsourcing labour companies located Manila.

### Supply chain

Monadelphous applies risk assessment criteria to identify suppliers with a high risk of modern slavery, including industry, geography and spend.

Monadelphous categorises its suppliers in accordance with the United Nations Standard Products and Services Code (UNSPSC) taxonomy. Suppliers operating within specific industries with known labour risks and those recruiting vulnerable populations are considered to have elevated risks of modern slavery. High-risk industries identified within the Monadelphous supply chain include:

- Construction - Building and Facility Construction and Maintenance Services
- Manufacturing - Structures and Building and Construction and Manufacturing Components and Supplies
- Recruitment Agencies and Labour Brokers - Human Resources Services
- International shipping - Marine Transport

In addition to high risk industry, suppliers are identified as high risk where operating in geographies with high vulnerability to modern slavery by reference to the Global Slavery Index. Monadelphous utilises suppliers located in Papua New Guinea, China, the Philippines and Mongolia, countries recognised by the Global Slavery Index as having a higher vulnerability to the risk of modern slavery.

## Mitigating risks of modern slavery

Monadelphous has in place a modern slavery framework articulating the Company's commitment to respecting human rights and outlining its approach to preventing, detecting and responding to the risks of modern slavery in its operations and supply chain. The Company's Group Risk and Assurance function is responsible for the regular review and maintenance of the modern slavery framework, working in collaboration with operations throughout the Group.

The modern slavery framework applies to Monadelphous Group Limited and its wholly owned and controlled entities.

### Stakeholder consultation and collaboration

In developing its modern slavery framework, corporate and operational stakeholders across the Company's Australian and overseas operations were consulted through workshops and interviews to ensure pertinent risks were identified and appropriately considered. Additionally, a third party provider with expertise in supply chain risk was engaged and a range of modern slavery organisations were consulted in the development of the framework.

To maintain ongoing suitability, the framework is reviewed on an annual basis in consultation with stakeholders across the business, and during the year, the framework was also independently reviewed by the Company's Group Assurance function. The Company continues to engage the same third party provider to complete regular supplier due

diligence and general risk screening. Further, Monadelphous continues to maintain its connection with human rights advocacy groups, periodically validating its approach and analysing data in the maintenance of its framework.

The Company's commitment and expectations in regard to mitigating modern slavery risk is communicated across the business to its owned and controlled entities through a number of channels outlined in this statement, including the overarching modern slavery framework, which encompasses policies and procedures, as well as education and training.

### Policies and governance

The Company's modern slavery framework is aimed at preventing, detecting and responding to incidents of modern slavery and human rights abuses in its operations and supply chain. The framework aligns with the Group's overarching risk management framework and consists of the following elements:

1. Control environment – culture and values, policy and governance
2. Risk identification and assessment – identifying and assessing modern slavery risks relevant to the Group's operations and supply chain
3. Risk management and control activities – managing and controlling modern slavery risks in the Group's operations and supply chain
4. Information and communication – providing information, education and awareness to employees, suppliers, customers, investors and other stakeholders
5. Monitoring and reporting – assurance, reporting and continuous improvement of processes

The Monadelphous Board is responsible for overseeing the Group's governance and risk management practices, which includes the modern slavery framework. Underpinning the framework are a suite of policies outlining the Company's commitment and expectations in relation to modern slavery.

During the year, Monadelphous reviewed its suite of policies as part of its annual policy review and the Code of Conduct was further enhanced to align with the Company's Acceptable Workplace Behaviour Policy. The Company also refined its Supplier Code of Conduct to further outline its minimum expectations of its suppliers in relation to human rights, including compliance with laws on employment practices, zero use of forced or compulsory labour and equal opportunity in employment, in addition to health and safety, environmental impacts, business integrity and ethics.

These policies are described below and are available on the Company's website at [www.monadelphous.com.au](http://www.monadelphous.com.au).

Policy / Procedure	Purpose
Code of Conduct	Provides guidance on the expected behaviour of all Monadelphous employees.
Acceptable Workplace Behaviour Policy	Outlines Monadelphous' commitment to ensuring the working environment is free from all forms of unacceptable behaviour, including bullying, harassment, sexual harassment, intimidation, abuse or any acts or threats of violence or assault.
Human Rights Policy	Outlines Monadelphous' commitment to respecting the human rights of every person involved in its operations, supply chain and communities.
Sustainability Policy	Outlines Monadelphous' commitment to achieving sustainable growth by ensuring the safety, wellbeing and development of its people, the delivery of outstanding service to its customers, caring for the environment and communities in which it works and providing superior returns to shareholders.
Integrity and Whistleblower Policies	Provides reporting frameworks through which Monadelphous employees, contractors, suppliers and members of the public are able to report instances of actual or suspected unethical or unlawful conduct, without fear of detrimental conduct.
Anti-Bribery and Corruption Policy	Outlines Monadelphous' zero tolerance to any form of bribery or corruption in the conduct of its activities.
Supplier Code of Conduct	Outlines Monadelphous' minimum expectations of the conduct of its suppliers in the areas of labour, human rights, integrity, ethics, health, safety and environment.

## Labour practices

Monadelphous engages its employees under fair, just and ethical employment contracts and does not partake in high risk or unethical labour engagement practices. The Company is guided by the following labour engagement principles:

- Not utilising migrant or seasonal labour
- Not charging employees to work through recruitment fees or imposing fines
- Not retaining employee original identification documents or preventing employees from moving freely
- Not using child labour
- Not undertaking deceptive recruiting practices

## Training and awareness

Improving awareness of modern slavery remains a critical aspect in identifying and addressing risk.

The Company's Code of Conduct training includes modern slavery and labour rights awareness content and is required to be completed by all Company employees during onboarding, and on an annual basis during employment tenure.

During the year, the Code of Conduct training was comprehensively enhanced to reinforce the Company's acceptable workplace behaviour standards, following a substantial review of associated processes and practices.

In addition to the Code of Conduct training, employees operating in high risk locations, as well as those frequently interacting with suppliers and subcontractors, complete additional modern slavery awareness training. This training assists those employees in identifying potential signs of modern slavery during supplier interactions and reiterates how to report suspected or actual concerns.

## Customer engagement

Monadelphous works with customers who share its values in respecting the human rights of every person involved in its operations, supply chain and the communities in which it operates.

Customer collaboration continues to provide the Company with valuable insights into current industry labour and human rights practices and effective approaches to investigating, controlling and responding to modern slavery risks. The Company applies these insights to enhance its own policies and procedures.

Additionally, Monadelphous participates in the disclosure of its own modern slavery practices to customers to assist them in meeting their modern slavery commitments and reporting requirements.

## Reporting of human rights concerns

Monadelphous maintains an independently facilitated Integrity Hotline service, where employees, contractors, suppliers and members of the public can report instances of actual or suspected unethical or unlawful conduct associated with Monadelphous operations and supply chains.

## Supplier contractual terms and conditions

Monadelphous' suite of procurement and subcontract terms and conditions templates include a contractually binding requirement for the supplier to comply with all applicable labour rights laws, practices and modern slavery requirements. The templates also require suppliers to comply with the Monadelphous Supplier Code of Conduct, which outlines the Company's expectations of supplier behaviour.



Monadelphous employees undertaking work at Perth Freight Terminal, Perth, Western Australia.



Procurement terms and conditions are available on the Company's website at [www.monadelphous.com.au](http://www.monadelphous.com.au).

## Supplier due diligence

Monadelphous undertakes a range of supplier due diligence and assessment activities to identify areas for further focus and applies scalable treatment strategies to address any identified concerns.

During the year, the Company continued its focus on identifying and addressing potential modern slavery risks within its direct supply chain. Whilst the Company has not identified any concerns within its direct supply chain, it acknowledges the potential for modern slavery risks to reside within its indirect supply chains. The Company reaffirms its commitment to continuing to work with direct suppliers to assess modern slavery risks within their supply chains and how these risks are being eradicated.

### Supplier due diligence screening

Monadelphous applies its modern slavery risk assessment criteria, which is based on industry category and geography, to its supplier database to identify high risk suppliers for detailed supplier due diligence screening. For suppliers identified as high and medium risk, further due diligence is undertaken by a third party provider specialising in

supply chain risk, and involves a detailed review of publicly available information to identify any social or labour rights concerns and an assessment of the supplier's modern slavery and labour rights policies.

### Supplier self-assessment questionnaire (SAQ)

To improve the transparency of supplier modern slavery practices, Monadelphous requires suppliers to complete a modern slavery self-assessment questionnaire (SAQ) during onboarding. During the year, the manual SAQ was replaced by an online version within the Company's supplier onboarding platform, enabling risk based questioning which is adaptive based on supplier responses, improving supplier participation and the depth of data collated.

To date, supplier responses to the SAQ continue to indicate varying degrees of modern slavery awareness, appreciation and maturity of controlling processes. SAQ data indicates a greater awareness and transparency of modern slavery related risks by Australian suppliers, likely due to a stronger focus in this area in recent years, in comparison to suppliers located within developing countries.

Any concerns identified during the SAQ process results in further direct supplier engagement, clarification and education to improve transparency and influence of supplier practices.

### Onsite supplier assessments

When identifying and onboarding new high spend suppliers or suppliers providing critical services, Monadelphous undertakes supplier capability assessments which may include visits to onsite supplier facilities. During the year, supplier capability assessment checklists were revised to introduce additional criteria to prompt assessors to identify signs of labour rights abuses or poor working conditions.

Additionally, throughout the period, a sample of onsite capability assessments were completed for suppliers operating in geographies and industries with a high prevalence of modern slavery. Supplier factories, workshops and worker accommodation quarters were visited to identify signs of labour rights abuses or unacceptable working conditions. No concerns were identified during the onsite supplier assessments completed during the period.

### Periodic supplier assessment

Acknowledging that a supplier's risk profile may change over time, the Company also undertakes periodic assessments of existing suppliers which trigger risk and spend thresholds.

### Treatment strategies

Monadelphous applies treatment strategies to address concerns identified during supplier onboarding assessments, periodic supplier assessments and other due diligence

activities. Similar to previous periods, the nature of concerns identified during the year largely necessitated clarification of supplier SAQ responses and practices, which continued to provide opportunities to engage with suppliers to validate understanding of modern slavery risks, and in some instances improving awareness and suggesting further controls and practices.

Monadelphous applies the following treatment strategies to address modern slavery concerns identified during the assessment process:

Clarification – where additional visibility or context is required. Throughout the period, suppliers were routinely contacted to seek clarity and confirmation in relation to their SAQ responses.

Education – raising supplier understanding and awareness of modern slavery risks. Engagement with suppliers regarding the SAQ or Supplier Code of Conduct continued to include elements of education regarding modern slavery risks and the importance of mitigation strategies.

Enhanced assessment – additional supplier assessment activities such as onsite focused audits of labour rights and hiring practices. No enhanced assessments were undertaken during the period.

Relationship termination – where zero-tolerance concerns are identified. During the period, there were no instances of supplier termination resulting from modern slavery concerns.

## Remediation

Monadelphous has in place a reporting framework, through which employees, contractors, suppliers, subcontractors and members of the public are able to report instances of actual or suspected unethical or unlawful conduct without fear of recrimination or reprisals, to the extent permitted by the law. The Company 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.

During the year, no human rights or modern slavery concerns were identified within Monadelphous' operations or supply chain.

## Measuring effectiveness

The Company remains focused on the application and refinement of its modern slavery framework and associated processes.

During the year, an independent review was undertaken by the Company's Group Assurance function to assess the effectiveness of the modern slavery framework and associated processes in identifying and mitigating the risk of modern slavery, and to identify opportunities for improvement. The review indicated that the Company's processes and controls were operating effectively with no adverse findings identified, and the results of the review were presented to the Company's Audit Committee.

The Company continues to consult with internal stakeholders to evaluate and improve the effectiveness of its modern slavery processes. The Company also continues to evaluate the suitability of its approach by benchmarking its framework against guidance provided by environmental, social, governance (ESG) and human rights advocacy groups, its customers and the investment community.

## Continuous improvement

Monadelphous remains committed to the continuous improvement of its modern slavery journey. A range of additional actions have commenced, or are planned, and will be reported in subsequent statements. These include the below activities.

Period	Activities
FY23 and beyond	<ul style="list-style-type: none"> <li>Continued emphasis of treatment strategies when engaging suppliers regarding concerns</li> <li>Further review of internal recruitment practices and labour conditions in high risk locations and industries</li> <li>Further introduction of modern slavery assessment criteria within supplier compliance auditing processes</li> <li>Completion of additional onsite supplier assessments for high risk / high spend suppliers</li> <li>Ongoing review and enhancement of modern slavery framework and associated policies and procedures</li> <li>Implement processes to assess modern slavery risks within indirect supply chain, through collaboration with direct suppliers</li> </ul>

## Approval

Approved by the Board of Monadelphous Group Limited.

A handwritten signature in black ink, appearing to read 'S. L. Murphy', followed by a period.

**S. L. Murphy**

Deputy Chair / Lead Independent Non-Executive Director

21 November 2022

## Appendix A

This statement applies to Monadelphous Group Limited (ultimate holding company), its wholly owned entities and the entities it controls as at 30 June 2022:

Company	Percentage Ownership	Country of Incorporation	ACN / Company #	Registered Office
Monadelphous Group Limited	N/A	Australia	008 988 547	59 Albany Highway Victoria Park, WA, 6100
Monadelphous Engineering Associates Pty Ltd	100	Australia	008 861 836	59 Albany Highway Victoria Park, WA, 6100
Monadelphous Engineering Pty Ltd	100	Australia	010 305 923	19 Lang Parade Milton, QLD, 4064
Monadelphous Properties Pty Ltd	100	Australia	008 840 499	59 Albany Highway Victoria Park, WA, 6100
Monadelphous Workforce Pty Ltd	100	Australia	089 259 754	19 Lang Parade Milton, QLD, 4064
Genco Pty Ltd	100	Australia	009 208 431	59 Albany Highway Victoria Park, WA, 6100
Monadelphous Electrical & Instrumentation Pty Ltd	100	Australia	092 951 043	59 Albany Highway Victoria Park, WA, 6100
Monadelphous PNG Ltd	100	Papua New Guinea	1-52392	59 Albany Highway Victoria Park, WA, 6100
Monadelphous Holdings Pty Ltd	100	Australia	116 520 908	59 Albany Highway Victoria Park, WA, 6100
Moway International Limited	100	Hong Kong	1167361	31/F, Tower Two, Times Square, 1 Matheson Street, Causeway Bay, Hong Kong
SinoStruct Pty Ltd *	100	Australia	128 995 764	59 Albany Highway Victoria Park, WA, 6100
Moway AustAsia Steel Structures Trading (Beijing) Company Limited	100	China	110000450074362	Unit 1105, Floor 11, Tower D Vantone Center Office Building A 6 Chaoyang Menwai Street Chaoyang District, Beijing, P.R.C.
SinoStruct Engineering & Fabrication (Tianjin) Co. Ltd	100	China	911201165813454792	No. 108, Luanhe Dongdao, Lingang Economic Zone, Binhai Administrative Area, Tianjin, P.R. China.
Monadelphous Group Limited Employee Share Trust	100	Australia	75 623 134 058	59 Albany Highway Victoria Park, WA, 6100
Monadelphous KT Pty Ltd	100	Australia	059 743 878	59 Albany Highway Victoria Park, WA, 6100
Monadelphous Energy Services Pty Ltd	100	Australia	081 037 121	59 Albany Highway Victoria Park, WA, 6100
Monadelphous Singapore Pte Ltd	100	Singapore	201227102W	38 Beach Road #29-11 South Beach Tower Singapore 189767
Monadelphous Mongolia LLC	100	Mongolia	5672406	Narnii Road 91 Sunroad building 903 Sukhbaatar District 1 Khoroo Ulaanbaatar 14230 Mongolia
M Workforce Pty Ltd	100	Australia	165 651 623	59 Albany Highway Victoria Park, WA, 6100
Monadelphous Engineering NZ Pty Ltd	100	New Zealand	Company number: 5583905 NZBN: 9429041593585	Level 3, 383 Colombo Street, Sydenham, Christchurch, 8023, New Zealand
Monadelphous Inc.	100	United States of America	FEIN 38-397047	59 Albany Highway Victoria Park, WA, 6100
M&ISS Pty Ltd	100	Australia	600 471 341	59 Albany Highway Victoria Park, WA, 6100
M Maintenance Services Pty Ltd	100	Australia	605 643 678	59 Albany Highway Victoria Park, WA, 6100

MGJV Pty Ltd	70	Australia	605 911 484	59 Albany Highway Victoria Park, WA, 6100
Evo Access Pty Ltd	100	Australia	169 739 324	59 Albany Highway Victoria Park, WA, 6100
Monadelphous Investments Pty Ltd	100	Australia	614 290 087	59 Albany Highway Victoria Park, WA, 6100
ArcWest Group Pty Ltd	100	Australia	140 307 562	59 Albany Highway Victoria Park, WA, 6100
MOAG Pty Ltd	100	Australia	615 255 493	59 Albany Highway Victoria Park, WA, 6100
MWOG Pty Ltd	100	Australia	614 889 351	59 Albany Highway Victoria Park, WA, 6100
RE&M Services Pty Ltd	100	Australia	621 862 566	c/o Aspen Corporate, 102 Beaufort St, Perth, WA 6000
Monadelphous International Holdings Pty Ltd	100	Australia	616 099 300	59 Albany Highway Victoria Park, WA, 6100
Monadelphous Sdn Bhd	100	Malaysia	1211845-W	1 Sentral, Jalan Rakyat, Kuala Lumpur, Malaysia
R.I.G Installations (Newcastle) Pty Ltd	100	Australia	071 257 059	59 Albany Highway Victoria Park, WA, 6100
Pilbara Rail Services Pty Ltd	100	Australia	626 707 668	Lot 2534 Coolawanyah Road, Karratha, WA, 6714
EC Projects Pty Ltd	100	Australia	633 245 799	59 Albany Highway Victoria Park, WA, 6100
Buildtek SpA	75	Chile	76.105.206-3	Isidora Goyenechea 2939, Piso 10, Las Condes, Santiago, Chile
MAQrent SpA	75	Chile	76.522.179-K	Avenida Del Valle 601, Oficina 22, Huechuraba, Santiago, Chile
Monadelphous Chile SpA	100	Chile	77.089.336-4	Avenida Del Valle 601, Oficina 22, Huechuraba, Santiago, Chile
MMW Projects Pty Ltd	100	Australia	653 199 289	59 Albany Highway Victoria Park, WA, 6100
Monadelphous RTW Pty Ltd	100	Australia	651 780 228	59 Albany Highway Victoria Park, WA, 6100

Notes:

This statement does not apply to Monadelphous' joint venture entities, Mondium Pty Ltd and Zenviron Pty Ltd, because Monadelphous does not control these entities in accordance with the Australian Accounting Standards (joint control and equity accounted).

\* SinoStruct Pty Ltd changed its name to Inteforge Pty Ltd on 28th October 2022.



## Appendix B

This statement was prepared to meet the mandatory reporting criteria set out in the Modern Slavery Act 2018 (Cth). The table below identifies where each criterion is disclosed within the different sections of the statement.

Modern Slavery Act 2018 (Cth) criteria	Monadelphous Modern Slavery Statement 2022
Identify the reporting entity	Introduction (page 3)
Describe the reporting entity's structure, operations and supply chain	Structure, operations and supply chain (pages 4-6)
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or control	Identifying risks of modern slavery (page 6)
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Mitigating risks of modern slavery (pages 7-10)
Describe how the reporting entity assesses the effectiveness of these actions	Measuring effectiveness (page 10)
Describe the process of consultation with entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Introduction (page 3) Stakeholder consultation and collaboration (page 7)
Provide any other relevant information	Continuous improvement (page 10)