

# Modern Slavery Statement 2021





# 01

## Introduction & Overview

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This statement has been prepared in line with the requirements of the Australian Modern Slavery Act 2018 (Cth), and sets out the actions taken by Civeo Pty Ltd (ACN 003 657 510) and its wholly owned and associated Australian entities (referred to collectively as “Civeo Australia,” “we,” “us” and “our”) to create awareness, foster transparency, assess and address modern slavery risk exposures in our operations and supply chain during the 2020 reporting period (1 January – 31 December 2020) (“Reporting Period”).

This is a joint statement made under section 14 of the Modern Slavery Act and is made in respect of Civeo Pty Ltd and its wholly owned subsidiary Action Industrial Catering (ACN 071 228 807) (“AIC”).

Civeo Australia’s Leadership Team (“Executive Committee”) and The Directors of both Civeo Pty Ltd and AIC have approved this joint statement and are committed to Civeo Australia’s efforts to address and remove modern slavery as an ongoing global concern.



## OUR STRUCTURE & OPERATIONS

Throughout Australia, Civeo Australia provides a number of services including remote accommodation and catering, site management and facilities management to our clients, who are predominantly in the energy and resources sector. These services are delivered either at Civeo Australia owned accommodation villages or at third party owned villages, which are located throughout Queensland, Western Australia and New South Wales.

Civeo Pty Ltd is ultimately owned by Civeo Corporation, a British Columbia, Canada company listed on the New York Stock Exchange ("Civeo Parent"). Civeo Pty Ltd has one wholly owned operating subsidiary, AIC, which was acquired by Civeo Pty Ltd in July 2019 and is considered a reporting entity under the Modern Slavery Act. As at 31 December 2020, Civeo Pty Ltd employed 440 employees and AIC employed 557 employees.

## OUR SUPPLY CHAIN

Civeo Australia operates an internal supply chain team which is based across our operations in Sydney, Brisbane, and Perth. The supply chain team is responsible for the management of Civeo Australia's supplier relationships and sourcing activities which include the provisioning of goods and services, strategic procurement functions, contracting, products assessment and compliance to relevant codes and standards. Civeo Australia's primary supply chain consists of over 200 suppliers who provide the goods and services essential to our operations. This includes fresh produce, meat, poultry, small goods, chemicals, cleaning and facilities maintenance services. Throughout Civeo Australia's internal supply chain there is a strong

emphasis on ethical sourcing, primarily focussed on partnering with companies that demonstrate the highest standards of human rights, safety, and risk management. Civeo Australia has a proud history of supporting Australian-based producers, growers and manufacturers, local small to medium enterprises and First Nations suppliers. Civeo Australia recognises that whilst our supply chain is predominantly Australian based, our supply partners may have large, complex, international supply chains. Our policies, processes and practices reflect Civeo Australia's commitment to ethical sourcing and the eradication of slavery within modern supply chains both directly with our suppliers and their upstream supply chains.

Civeo Australia provides a number of services including remote accommodation and catering, site management and facilities management to our clients, who are predominantly in the energy and resources sector.







## 02

# Modern slavery risks in our operations & supply chain

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Civeo Australia recognises that modern slavery is a global problem, and that it can occur anywhere in the world. During the Reporting Period, Civeo Australia has taken steps to investigate and identify any potential for our operations or supply chain to cause, contribute or be linked to modern slavery.

We relied on several sources of information to identify the risks across our organisation and supply chain in relation to modern slavery. This information included geographic data regarding the global regions in which modern slavery is most prevalent, as well as information from reputable external organisations regarding modern slavery prevalence, including Government agencies, media organisations and industry bodies.

**AS A RESULT OF OUR REVIEW OF THIS DATA, WE IMPLEMENTED:**

- Critical risk-based assessment criteria, which all current and new suppliers are measured against; and
- Internal review processes which are carried out on a rolling annual basis based on the risk level applied to the supply category.



This information was then used to build a framework for review of our supply chain,

**WHICH INCLUDED:**

- Compulsory risk-based assessments undertaken by Civeo Australia trained and qualified Procurement specialists, for all new and potential suppliers;
- Suppliers are subject to desktop and site-based audits depending on the risk attributed to their specific area of supply;
- Sustainable and ethical procurement questionnaires issued to suppliers on an ad-hoc basis; and
- Face to face supplier visits conducted by members of Civeo Australia’s Senior Leadership team alongside the Procurement and Health, Safety, Quality and Environment (“HSQE”) departments.





As a result of this review, Civeo Australia identified during the Reporting Period that there were four supply categories which potentially presented a higher risk of modern slavery than others within our local supply chain.

#### **THESE CATEGORIES WERE:**

- Industries within Australia that rely on migrant labour, such as the harvesting of fruit and vegetables, meat production facilities and textile industries;
- The Australian seafood industry;
- Industries which rely heavily on imported goods, such as the manufacturing of plastics, papers, cleaning equipment, chemicals and garments and textiles; and
- Commodities harvested overseas, such as coffee beans, tea leaves and cocoa beans.

THESE AREAS WILL CONTINUE TO BE FOCUS AREAS WITHIN OUR OPERATIONS AND SUPPLY CHAIN FOR FURTHER DUE DILIGENCE, AS WILL BE ANY ADDITIONAL NEW HIGHER RISK AREAS WE IDENTIFY.



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# 03

## Modern slavery assessment & actions

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Civeo Australia's approach to dealing with the risks of modern slavery practices within our operations and supply chain is centred around the following five areas:

1. Setting our minimum expectations and standards for our suppliers to follow and adhere to;
2. Communicating these expectations and standards in an effective manner to our suppliers;
3. Educating our staff about modern slavery and the key risks;
4. Providing our staff and suppliers with mechanisms to report potential risks and breaches easily, confidentially and, in some cases anonymously; and
5. A planned approach to assist with and remedy any potential risks or breaches which are brought to our attention.

### SETTING OUR EXPECTATIONS & STANDARDS

Civeo Australia implemented an **Ethical Sourcing and Modern Slavery Policy** ("Policy") and Procedure ("Procedure"), on the 1st of June 2019. This Policy compliments our sustainable procurement practices, which already incorporated a set of guidelines for how Civeo Australia will conduct its business with our supply partners including both ethical procurement practices and basic conditions (including fair wage and work conditions) to which all of our supply partners must be compliant.

Our standards and expectations are communicated to all potential suppliers during the request for information, quotation and tendering processes. Suppliers must then formally agree to be bound by the following at the point of being engaged:

1. Civeo Australia's minimum standards and expectations as published within the Procedure and contained within Civeo Australia's supplier application package. The Procedure sets out the values and ethics Civeo Australia expects from its supply partners when conducting business for, in service to or on behalf of Civeo Australia;
2. Civeo Australia's global **Anti-Bribery Policy** and **Corporate Code of Business Conduct and Ethics**. These policies define the standard of behaviour expected from all our staff and our supply partners in their business dealings with peers, customers, clients, suppliers, stakeholders, and shareholders.

Civeo Australia also contractually requires that all suppliers have in place policies and procedures for dealing with modern slavery laws and notify us of any breaches or potential breaches of modern slavery laws (where applicable). We also require our supply partners to keep accurate and up to date records which allow us to trace the supply chain of goods and services provided to Civeo Australia.





## COMMUNICATING OUR EXPECTATIONS & STANDARDS

During the Reporting Period we released our Policy and Procedure to our supplier base and have begun conducting a large-scale review of all suppliers' capabilities to effectively mitigate the risk of modern slavery occurring throughout their supply chains.

As part of this process, suppliers were asked to confirm their risk mitigation strategies in relation to modern slavery by way of declarations and targeted questionnaires. Other measures that were implemented during the Reporting Period included:

1. Review of relevant internal policies and procedures, including in particular our Vendor Assessment and Engagement Procedure which outlines Civeo Australia policies, procedures, process, and decision-making criteria in relation to the selection of potential supply partners; and
2. Formal communication of our ethical sourcing and modern slavery expectations and standards to all potential and existing suppliers.

## SUPPLY CHAIN ENGAGEMENT

Each potential supplier is provided with a supplier application pack, which clearly outlines Civeo Australia's expectations with respect to modern slavery and other compliance matters. Completing the pack, and signing the declaration contained within it ensures that potential suppliers are all aware of and agree to comply with Civeo Australia's minimum standards and expectations.

Civeo Australia has adjusted our standard "Conditions of Purchase" (which is attached to our purchase orders) as well as template agreements to include specific modern slavery clauses under which suppliers agree and warrant that their business will comply with its obligations under the Modern Slavery Act.

## SUPPLY CHAIN AUDITS

When undertaking internal due diligence processes in relation to new suppliers, Civeo Australia's Procurement team conduct two types of audit depending on the level of risk associated with the new supplier. First is a desktop audit which covers several factors including a review of:

1. The supplier's quality management and safety systems;
2. Employee pay rates (where applicable) and employment conditions;
3. The ethical sourcing and modern slavery requirements of that particular supplier;
4. The supplier's insurances and workers compensation arrangements; and
5. The supplier's downstream supply chain.



Where any modern slavery risks are identified during the initial review, and/or if the category of supplied goods or services is considered higher risk (as identified above in Section Two), then Civeo Australia will request a physical on-site inspection, which will be carried out by Civeo Australia's qualified HSQE staff and Procurement team. This on-site inspection is intended to allow Civeo Australia to better understand and visually inspect the points outlined above.

### **EDUCATING OURSELVES AND COLLEAGUES ABOUT MODERN SLAVERY AND THE KEY RISKS**

During the Reporting Period, Civeo Australia's Procurement team conducted regular information sessions with team members focussing on modern slavery risks. Furthermore, an internal information session was conducted for Civeo Australia employees about modern slavery. Civeo Australia will continue to provide training to its employees going forward in relation to this area.



## PROVIDING OUR STAFF AND SUPPLIERS WITH MECHANISMS TO REPORT POTENTIAL RISKS AND BREACHES

Aligned with Civeo Parent's five core values (Integrity, Safety, Excellence, Collaboration and Care), and its Code of Conduct, Civeo Australia remains committed to delivering solutions for our people to report any concerns easily, confidentially and if required, anonymously, using a number of methods including:

- Directly to Civeo Australia's EGM, Human Resources and HSQE, its EGM, Business Improvement or GM, Supply Chain (on a confidential basis);
- Anonymously via Civeo Parent's ethics hotline; or
- Easily, through Civeo Australia's Safety Management System ("MyOSH")

We actively encourage our teams to discuss matters of concern through any of these channels. Externally, suppliers can raise concerns directly with Civeo Australia senior team or by contacting Civeo Parent's ethics hotline. Civeo Parent's global Policy for Employee Complaint and Reporting Procedures, which includes an Australian whistleblower addendum,

outlines the various ways in which compliance matters can be raised by employees or suppliers, and ensures these matters are dealt with, and whistleblowers are protected, in accordance with the law.

## A PLANNED APPROACH TO ASSIST WITH AND REMEDY ANY POTENTIAL RISKS OR BREACHES

All matters involving our suppliers and potential modern slavery-related or other contractual breaches are handled on an individual basis in accordance with our policies and procedures and, if applicable, relevant contractual provisions. Some of the actions Civeo Australia may take following a breach, or potential risk of breach, are as follows:

- Notification of the relevant supplier;
- Outline of an appropriate course of action for the supplier to undertake to remedy the breach or potential risk; and
- Monitoring of the supplier, and any further downstream supply chain network that may be affected or identified as part of the breach, or potential risk. Continuously monitor the supplier to ensure future compliance.







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## Measuring our Effectiveness

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- » ASSESSMENT
- » REVIEW
- » MEASUREMENT
- » COLLABORATION

To ensure that we are striving for continuous improvement within the areas of ethical sourcing and modern slavery, our Procurement team undertakes the following activities to evaluate the effectiveness of our existing policies and procedures:

- Bi-annual modern slavery risk assessment conducted across Civeo Australia's entire supply chain.
- External review of our policies and procedures, conducted annually by third-party auditors as part of Civeo Australia's ISO9001 certification.
- Measurement of supplier performance, through established key performance indicators.
- 360 feedback, and review process conducted with senior stakeholders and suppliers.
- Working with industry peers to share best practice and identify knowledge gaps.
- Collaboration with our suppliers, and their downstream supply chains to foster and promote an awareness of modern slavery throughout the wider supply chain.



FIRE WATER  
HYDRANT SYSTEM  
72,000 LITRES

  
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# 05

## Conclusion

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In preparing this statement Civeo Australia understands that bringing modern slavery to the forefront of our conversations and actions is critical to creating awareness and understanding throughout our supply chain. With this in mind we have collaborated with members of our Procurement, Legal and Community Relations teams and Executive Committee to prepare this document.

This joint statement has been approved by the board of directors of each of Civeo Pty Ltd and Action Industrial Catering Pty on the 29 June 2021, and signed by Peter McCann, as director of Civeo Pty Ltd and Action Industrial Catering Pty Ltd.



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**Peter McCann**

Director of Civeo Pty Ltd  
Director of Action Industrial Catering Pty Ltd  
29 June 2021





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