

**MODERN SLAVERY
STATEMENT FY2025
M2P ENGINEERING**

About M2P Engineering

M2P Engineering (M2P) is a leading Australian-owned heavy industry construction, maintenance and engineering services provider delivering structural, mechanical, and piping (SMP) projects across Australia. Operating nationally, with a particular focus on the mining and energy sectors, M2P has branch locations and fabrication workshops located around the country. We offer local-first solutions to design, construct, improve and maintain customer operations.

We deliver projects in some of the most remote locations in Australia under fly-in, fly-out (FIFO) arrangements. Our operations are supported by a diverse supply chain, including subcontractors, equipment hire, fabrication, transport, and the procurement of materials and consumables from both domestic and international sources.

M2P's supply chain is comprised of both dynamic and non-dynamic components. This distinction allows for targeted risk assessment and controls based on exposure and change frequency.

- Dynamic components - subcontracted labour, equipment hire, fabrication, and logistics vary from project to project
- Non-dynamic components - recurring material supply, uniforms, PPE, and corporate services remain stable under longer-term agreements.

We uphold ISO-certified systems for Quality (ISO 9001), Environmental Management (ISO 14001), and Occupational Health and Safety (ISO 45001), demonstrating our commitment to ethical and responsible business practices through structured, auditable processes.

Risks of Modern Slavery

While the risk of modern slavery in M2P's directly employed workforce is considered low due to strong Australian labour laws and employment protections, we recognise that risks can arise in:

- Subcontracting and labour hire – use of temporary or remote labour where recruitment transparency and worker protections require careful consideration during future assessments.
- Supply of goods and consumables – items such as PPE, uniforms, tools, and manufactured materials sourced internationally, particularly from higher-risk jurisdictions.
- Logistics and freight – complex transport chains where oversight can be challenging.
- Multi-tier subcontractor arrangements – where visibility over lower tiers is

typically limited.

Policies

M2P has adopted several policies and codes aimed at preventing modern slavery, including:

1. Modern Slavery Policy: Outlines our principles - Zero Tolerance, Due Diligence, Transparency and Accountability and Continuous Improvement.
2. Code of Conduct: Upholds ethical behaviour, transparency, and accountability across all operations including a section on 'What speaking up looks like' and protecting those who speak up;
3. Business Ethics and Anti-Bribery Policy: Embedded clauses and expectations around ethical sourcing and anti-slavery commitments.
4. Sustainability and Social Responsibility Policy: Ethical conduct along with socially responsible ethical sourcing.

These documents collectively establish a foundation for compliance. Each policy is reviewed annually to ensure alignment with legal requirements and operational practice. Responsibility for oversight sits with the M2P Commercial and Leadership teams.

Actions Taken

This is M2P's first reporting period for Modern Slavery having reached the threshold for reporting late in the financial period.

In this reporting period, M2P's primary focus has been strengthening internal capability by ensuring our procurement teams are trained to identify and manage modern slavery risks. Our efforts have centered on laying the groundwork for future supplier assessment processes, reflecting a proportionate and practical starting point for building a scalable modern slavery framework.

Over future reporting periods, M2P intends to operationalise this by requesting selected suppliers to outline their own modern slavery controls and, where appropriate, provide evidence of ethical sourcing practices. The outcomes of this work will inform the design of a simple supplier risk-rating matrix for use in subsequent reporting cycles.

Where indicators of elevated risk are identified in future assessments, M2P intends to seek further assurance from suppliers regarding their modern slavery controls and ethical sourcing practices. These steps form part of an incremental and resource-aligned approach to building a more structured risk-assessment process while also allowing M2P to implement meaningful controls aligned with available resources and data maturity, ensuring compliance actions are realistic, measurable, and capable of

being evidenced. This assessment will be reviewed annually.

M2P has implemented several measures to mitigate modern slavery risks:

- **Policy Framework** – We maintain a Modern Slavery Policy, Code of Conduct, and Business Ethics and Anti-Bribery Policy which articulate our zero-tolerance position and obligations.
- **Whistleblower Protections** – Workers and suppliers can raise concerns confidentially and without retaliation.
- **Identify high level spend categories** - A desktop segmentation of procurement spend was undertaken to identify key spend categories and understand which areas may present higher inherent risk for future review.
- **Training** – Procurement personnel were required to complete the Australian Government’s Modern Slavery e-learning modules, establishing a foundational level of awareness.

Assessing Effectiveness

These KPIs establish the baseline for assessing effectiveness in the next reporting period as our framework matures.

Key Performance Indicators (KPI's)

For FY2026, our KPIs include:

1. Contractual Controls – Develop and embed a modern slavery clause suite across M2P’s standard contract templates and purchase order terms.
2. Supplier Due Diligence
 - a. Supplier Questionnaire and Declaration – Require all new suppliers to complete a self assessment to identify, assess and document modern slavery risks across their operations and supply chain. Includes a declaration confirming no forced or child labour and compliance with applicable labour laws.
 - b. Prequalification & Risk Register- Implement a screening process at supplier onboarding to capture key modern slavery risk indicators including country of manufacture/origin, labour type, and supplier policy and record the outcomes in a centralised risk register.
3. Training & Awareness
 - a. Targeted Training - Require all Procurement, Tender and Commercial personnel to complete the Australian Government’s Modern Slavery e-learning modules to build capability in identifying and managing modern slavery risks.

- b. Induction Training - Ensure all new employees complete M2P induction training that covers the types and indicators of modern slavery, along with M2P's legal and ethical responsibilities.
4. Centralised documentation storage - Maintain a central repository for supplier declarations and compliance evidence, creating a traceable record of actions taken.

This provides a realistic framework for tracking progress while building capability for deeper evaluation in future reporting cycles.

Measurements

Effectiveness is measured through compliance data. We will assess the effectiveness of our actions through

- Contractual controls – evidence of clauses integrated into standard contract templates.
- Supplier Onboarding – evidence of prequalification questions included in the onboarding process, risk register established and populated for all newly onboarded suppliers.
- Training & Awareness – Completion records maintained for targeted training and Modern Slavery content embedded into inductions.
- Centralised documentation storage - Central folder established and maintained for storing supplier declarations and risk assessments. All new supplier documentation uploaded at the point of onboarding Quarterly spot checks to confirm files are up to date.
- Whistleblower Channels – ensuring our whistleblower mechanism explicitly covers modern slavery.
- Procurement Reviews – integrating modern slavery considerations into existing procurement and contract review processes.

Consultation & Collaboration

We do not own or control any other entities and therefore this criterion is not applicable.

This statement has been developed in consultation with M2P's Commercial, Supply Chain, and People & Culture teams. These teams are integral to supplier onboarding, contract management, and workforce management.

We engage with industry bodies, clients, and subcontractors to share best practices and improve sector-wide responses to modern slavery risks, and we have started to raise awareness of our commitments with our key subcontractors and suppliers.

Future Commitments

M2P is committed to continuous improvement. Over the next reporting period we will:

- Develop a proportionate modern slavery risk assessment approach that will use publicly available risk indicators, supplier self disclosures and basic country of origin insights. Over time, this will support a simple low/medium/high risk-rating method to help identify suppliers that may warrant closer review based on spend category and inherent risk factors.
- Review the supplier onboarding process to assess whether requesting an extended questionnaire from suppliers is practical and proportionate for future application.
- Deliver annual refresher training to all procurement, tender and commercial staff.
- Strengthen escalation pathways by reviewing how modern slavery considerations are incorporated into procurement reviews and internal decision-making processes.

These commitments reflect an incremental, evidence-based approach designed to strengthen compliance without overextending operational capacity.

Governance

The M2P Commercial team oversees compliance with the Modern Slavery Act 2018 (Cth).

Governance includes annual reviews, collaboration with procurement, compliance, and project delivery teams to ensure robust application and continuous monitoring of our anti-slavery policies.

The annual review will summarise supplier screening outcomes, training completion rates, and any corrective actions taken. Records are retained for audit verification.

This statement covers FY25 period 1 July 2024 to 30 June 2025 and has been reviewed and approved by Adam Beswick as the Sole Director and principal governing body of M2P Engineering.



Adam Beswick

Sole Director of M2P Engineering
18 December 2025

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Final Audit Report

2025-12-23

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