

Modern Slavery Statement FY22

1 January 2022 - 31 December 2022





Introduction

ABOUT THIS STATEMENT

This statement is a joint statement made under section 14 of the *Modern Slavery Act Cth (2018)* ("**Modern Slavery Act**") and is made in respect of Civeo Pty Ltd (ACN 003 657 510) and its wholly owned subsidiary, Action Industrial Catering Pty Ltd (ACN 071 228 807) (collectively referred to as "**Civeo Australia**", "**we**", "**us**" and "**our**" in this statement). This is Civeo Australia's third annual modern slavery statement.

The purpose of this statement is to detail the structure, operations and supply chain of Civeo Australia as well as risks identified and actions taken by Civeo Australia, during the 2022 reporting period (1 January – 31 December 2022) ("**Reporting Period**"). Civeo Pty Ltd consulted with Action Industrial Catering Pty Ltd in the development of this statement, as well as with key stakeholders across Civeo Australia's business and Civeo Australia's Leadership Team ("**Executive Committee**").

The Board of Directors of both Civeo Pty Ltd and Action Industrial Catering Pty Ltd have approved this joint statement.

WHAT IS CIVEO AUSTRALIA'S APPROACH TO MODERN SLAVERY?

Civeo Australia continues to follow a zero-tolerance approach to modern slavery through our operations and supply chain, which aligns with our mission, shared purpose and values. Civeo Australia understands that modern slavery takes many forms and that we must continue to strive to ensure our operations and supply chain have strong controls and governance in place with respect to modern slavery.

This statement serves to describe the actions we have taken in the Reporting Period to identify and seek to reduce the risks of modern slavery practices within our operations and our supply chain. During the Reporting Period, we:

- strengthened our focus on the original risk areas identified as part of our ethical sourcing and modern slavery framework established in 2019 and reported in our 2020 and 2021 Modern Slavery Statements;
- continued to monitor the effects of COVID-19, as well as other disruptions (including the Ukraine war and extreme weather events) on global and domestic supply chains and reviewed how these matters are impacting our supply network in terms of sourcing regions, labour forces and traded commodities;
- strengthened our supplier engagement through collaboration, risk assessment reviews and audits; and
- continued to monitor and review the practices used to assess the effectiveness of Civeo Australia's actions and measures for assessing and addressing modern slavery risks.

OUR MISSION, VALUES AND SHARED PURPOSE

To create remarkable experiences for the people and communities we serve. It's what we do.

Civeo Australia is dedicated to creating and setting higher standards in our industry. We recognise our actions can contribute to a positive impact on our people, our customers and the communities where we live and work. We focus on food safety, housekeeping, maintenance and wellbeing programs at our villages to ensure a comfortable, safe, healthy environment for our guests. Our aim is to provide comfortable

and safe living environments while seeking to minimize our environmental footprint and to support the communities in which we live and work. Just as important as what we do is the manner in which we operate. As a leader in workforce accommodations, we hold ourselves to a high standard when it comes to safety, the environment and our active involvement in the community. **It's just what we do.**

OUR VALUES

Civeo Australia's core values of Safety, Care, Integrity, Excellence and Collaboration are the principles that form the foundation on which we perform work and ultimately influence and shape our amazing culture.



At Civeo we conduct our operational and supply chain activities within our ethical sourcing and modern slavery framework so that treating people, communities and the environment with **care** is at the forefront of our operations. Through **collaboration** internally and externally with stakeholders, we strive to deliver service **excellence** and act with **integrity** through strong and transparent relationships, well communicated and monitored supplier expectations and standards, and thorough reporting processes. At Civeo, the **safety** of our employees and guests comes first, and part of this includes sourcing goods and services safely and sustainably, where possible, within our supply chain operations.







Our structure, operations and supply chain

OUR STRUCTURE AND 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, South Australia and New South Wales.

Civeo Pty Ltd is ultimately owned by Civeo Corporation, a Canadian company listed on the New York Stock Exchange ("**Civeo Parent**"). Civeo Pty Ltd has one wholly owned operating subsidiary, Action Industrial Catering Pty Ltd, which is considered a reporting entity under the Modern Slavery Act. As of 31 December 2022, Civeo Pty Ltd employed 502 employees and Action Industrial Catering Pty Ltd employed 783 employees.



OUR SUPPLY CHAIN

At Civeo Australia, we recognise the critical role that our extensive supply chain plays in our operations. With over 500 suppliers and subcontractors, we seek to maintain high standards of procurement practices, including by placing strong emphasis on supplier due diligence and internal governance.

Our dedicated internal supply chain team, strategically positioned across our corporate offices in Sydney, Brisbane and Perth, take on the responsibility of effectively managing Civeo Australia's supplier relationships and overseeing all sourcing activities. This includes the procurement of goods and services, execution of strategic procurement functions, contracting processes, product assessment and ensuring compliance with relevant codes and standards. Our aim is to foster strong relationships with our suppliers and ensure that ethical practices and strong governance are at the forefront of our supply chain activities.

One of our key objectives is to engage in ethical sourcing, actively seeking partnerships with companies that share our commitment to high ethical and sustainable sourcing standards, safety measures and effective risk management. We firmly believe that by aligning with like-minded organisations, we can collectively seek to reduce the challenges associated with modern slavery.

To achieve our objectives, over recent years we have implemented comprehensive policies and robust processes and practices that reflect Civeo Australia's dedication to ethical sourcing.



Our supply chain team regularly undertakes assessments of the potential risks of modern slavery within our supply chain, with the aim of ensuring that our suppliers adhere to stringent standards. Through a system of monitoring and evaluating our suppliers, we seek to proactively identify potential risk indicators of modern slavery and, where identified, take appropriate actions to seek to mitigate these risks. Our supply chain team also works collaboratively across the other departments in our business, including our operations, health, safety, quality and environment (“**HSQE**”), people and culture, legal and finance teams, on refining existing processes and also new initiatives.

We are committed to fostering transparency throughout our supply chain. By openly communicating our expectations and requirements to our suppliers, we empower them to align their operations with our ethical sourcing and modern slavery standards.

SOURCING STRATEGY

At Civeo Australia our sourcing strategy is based on category management. We consider that this approach presents significant benefits in addressing modern slavery within complex supply chains by providing better visibility over supply chains, which is crucial in identifying and mitigating the risk of modern slavery. Through category management, Civeo Australia can assess and categorise our suppliers, understand the specific products or services they provide and seek to identify the associated risks.

Civeo Australia's strong Buy Local, Buy Australian procurement culture and its proud history of partnering with Australian based producers, growers and manufacturers, as well as partnering with Aboriginal and/or Torres Strait Islander (“**First Nations**”) owned and/or operated suppliers and small to medium enterprises (ie businesses that are at least 50% owned or controlled by First Nations' people), further enhances the effectiveness of category management in reducing the risks of modern slavery in our supply chain. By prioritising local suppliers, we are able to establish closer relationships and foster greater transparency throughout our supply chain. This proximity enables more frequent and direct communication and audits and monitoring, which in turn reduces the likelihood of modern slavery practices going undetected.

The combination of category management sourcing and Civeo Australia's commitment to supporting local businesses allows for a proactive approach to identifying and seeking to minimise modern slavery practices in our supply chain, while also contributing to economic growth and sustainability within Australia.



100% of Civeo Australia's meat (Beef, Lamb, Chicken and Pork) is farmed and sourced from Australian primary producers and distributors.

98% of Civeo Australia's fresh fruit and vegetables is grown on Australian shores, and distributed through our operations by our Australian owned, family-operated wholesaler.

100% of Civeo Australia's fish purchased within our Western Australian operations is sourced sustainably, from Australia and New Zealand, and distributed into our operations by our local, family-owned distributor.



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Modern slavery risk identification in the Reporting Period

CONTINUED HIGH RISK AREAS

Since the inception of Civeo Australia's modern slavery and ethical sourcing framework in 2019, we have identified certain categories within our supply chain that, while essential to our operations, represent a heightened risk of modern slavery to our business. Civeo Australia continued to monitor these categories during the Reporting Period.

Continued high risk areas in 2022:

1.

Industries such as the harvesting of fruit and vegetables, meat production facilities and textile industries which rely on migrant labour.

2.

The Australian seafood and fish industry and products.

3.

Industries which have a high reliance on imported goods or raw materials such as the domestic manufacturing of plastic consumables and disposables, electronic and technology components and goods, trade parts and the domestic coffee roasting industry.

4.

Industries associated with commodities harvested overseas including coffee beans, tea leaves and cocoa beans.

Due to the nature of the services offered by Civeo Australia, these products will continue to form part of Civeo Australia's total supply chain and, therefore, we consider it important to continue to place an emphasis on monitoring suppliers within these categories. Given this, throughout the Reporting Period, Civeo Australia completed the following actions in relation to the categories listed above to ensure that our suppliers were meeting our standards in relation to ethical sourcing and modern slavery, which are set out in further detail in Part 4 of this Statement:

- 1.** 100% of Civeo Australia's fresh fruit and vegetable suppliers or distributors completed a modern slavery risk assessment for the Reporting Period.
- 2.** 75% of fresh fruit and vegetable suppliers or distributors were physically audited by Civeo's internal supply chain and HSQE teams.
- 3.** Civeo Australia's supply chain visited and conducted inspections of 3 marketplaces and 16 farms within our downstream supply chain network.
- 4.** Civeo Australia's largest fresh and frozen seafood supplier was audited to ensure compliance with Civeo Australia's specifications. We also reviewed the supplier's internal approach to modern slavery and their governance structure.
- 5.** Civeo Australia is working with our Australian based, First Nations owned chemical manufacturer to include their products within our consumables and disposables distribution supply partner's range. Our supply partner is a world leader in this space, with strong ethical business practices and robust modern slavery governance. Accordingly, inclusion of our chemical manufacturer's products within our supply partner's range will further enhance its ability to meet our standards with regards to ethical sourcing and modern slavery.
- 6.** We have extended our relationship with our current supply partner to cover more products in critical risk categories such as coffee beans and sustainable disposable packages solutions.

As referenced in our previous Modern Slavery Statement for the 2021 reporting period, Civeo Australia had identified during the 2021 reporting period that Medical and Safety/Personal Protective Equipment (PPE) had become an additional high risk category. Through collaborating with our operations and HSQE teams in the Reporting Period, we have been able to streamline the number of products required within this category and our specifications for such products. This has allowed us to isolate these products to specific manufacturers distributed through our approved supply chains. This has reduced Civeo's exposure to unknown downstream manufacturers entering our supply chain and fostered stronger transparency for the origins of these products.

NEW AND SUSTAINED RISK AREAS

In the Reporting Period, Civeo Australia continued to review its supplier portfolio to seek to identify potential new high risk areas in relation to modern slavery and ethical sourcing.

During the Reporting Period, Civeo Australia has identified that the war in Ukraine and several extreme weather events have amplified the potential risk of modern slavery within both global and domestic supply chains. In addition to these factors, we have also experienced disruption to our domestic supply chains due to certain largely domestic factors, such as logistical interruptions. Along with these newly identified modern slavery risks, Civeo Australia continues to monitor the ongoing impact of the COVID-19 pandemic and labour shortages. These categories are addressed in further detail below.

THE ONGOING IMPACT OF COVID-19

The impact of the COVID-19 pandemic continued to pose challenges to global supply chains during the Reporting Period, with international lockdowns and disruptions in the flow of raw materials and finished goods exposing vulnerabilities in supply chain sourcing strategies. Civeo Australia experienced supply chain impacts such as disruptions in overseas manufacturing and availability of essential goods, as well as delays in logistics and delivery. As a result, Civeo Australia has sought to continue to reduce dependence on imported goods where possible and increase engagement with alternate suppliers.

CONTINUED LABOUR SHORTAGES

As a participant in Australia's hospitality and facilities management sector, we have been impacted by continued labour shortages in the Reporting Period, largely as a result of Australia's low unemployment rate, continued reduced volumes of international workers and a skills shortage in the trade sector. This has meant that Civeo Australia has continued to rely on labour hire during the Reporting Period. Civeo Australia identified the use of labour hire as a sustained risk area in the Reporting Period. In order to seek to mitigate these risks, Civeo Australia's supply chain team, in collaboration with our people and culture team, engaged with our labour hire providers to establish a set of standardised wages and conditions across our labour hire provider portfolio. Labour hire providers must extend these wages and conditions to labour hire employees for work conducted on Civeo Australia owned or operated sites.

THE WAR IN UKRAINE

The war in Ukraine has had wide reaching impacts on global supply chains and manufacturing productivity during the Reporting Period, including in relation to supply of commodities such as grains and disruption to trade routes.

Civeo Australia has reviewed its internal supply chain to ensure that there are no products within our supply chain from countries that are directly involved or sanctioned as a result of this conflict. As the majority of Civeo's Tier 1 supplier expenditure is with suppliers and subcontractors based in Australia, Civeo Australia recognised that the impacts of the war in Ukraine on Australia's direct supply chain during the Reporting Period were minimal. However, Civeo Australia has identified this as an area for continued monitoring.





EXTREME WEATHER EVENTS AND OTHER SUPPLY CHAIN DISRUPTIONS

Throughout the Reporting Period, extreme weather events in Australia, such as floods and bushfires, damaged agricultural production. This led to reduced yields and food shortages which disrupted Civeo Australia's supply chain and affected the availability of products. In response, Civeo Australia's supply chain team had to seek alternative sourcing options, sometimes in reduced timeframes, which we have identified as a potential modern slavery risk.

This is on the basis that the increased demand for labor and resources during extreme weather events can also create vulnerabilities within the supply chains. The urgent need to maintain operations and support affected communities may result in a surge in labour needs, creating opportunities for labour exploitation, particularly among temporary or migrant workers. Civeo Australia therefore focused during the Reporting Period on maintaining adherence to our ethical sourcing and modern slavery policies and procedures to seek to mitigate any heightened modern slavery risks that may arise from the disruptions caused by extreme weather events.

Civeo Australia has also been affected by other domestic disruptions such as train derailments and logistics shutdowns. This resulted in Civeo Australia's supply chain having to source new products that were available locally within the specific states of operations and use products which had not previously been vetted through our supply chain processes.

However, when encountering these disruptions to our supply chains, Civeo Australia continued to enforce a comprehensive supply chain management strategy to protect our operations and supply. This included actively engaging with suppliers, conducting due diligence on new suppliers and monitoring labour conditions.



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Our actions to assess and address risks in the Reporting Period

OVERVIEW OF KEY ACTIONS

During the Reporting Period, Civeo Australia:

1. continued to review and enhance its existing control measures, as outlined in the 2021 Reporting Period, including through annual review of Civeo Australia's modern slavery procedures and policies, continued internal training and review of our Vendor Selection and Engagement Program (**Existing Controls**);
2. completed a modern slavery risk assessment with identified critical supplier partners, with a special focus on heightened risk categories including fruit and vegetables, seafood and labour;
3. increased our physical presence within our supply partners' downstream supply chains, including by undertaking additional due diligence on these downstream supply chains through measures such as meeting with manufacturers and conducting on-the-ground inspections of selected supply partners' downstream supply chains, and also actively securing goods directly from reputable producers in categories where potential risk areas were identified;
4. conducted additional due diligence on labour hire providers to seek to ensure such providers were conducting their businesses in accordance with their own internal governance frameworks, and that they met Civeo Australia's minimum standards and expectations for suppliers;
5. conducted country of origin audits with a number of our largest suppliers through a data sharing activity that allowed us to internally review the origin of a range of products and audit these against identified areas of concern; and
6. investigated technology solutions to further enhance Civeo Australia's control measures and governance.

Further information on actions taken during the Reporting Period are set on the next page.

EXISTING CONTROLS

During the Reporting Period, Civeo Australia undertook several key initiatives to improve our existing control measures and seek to reduce modern slavery risks, including:

1. conducting an annual review of our modern slavery procedures and policies, ensuring their continued effectiveness and alignment with regulatory requirements. This demonstrates Civeo Australia's commitment to staying updated on best practices in combating modern slavery;
2. refining our Vendor Selection and Engagement Program (**Vendor Program**), including by implementing more rigorous due diligence measures to assess potential suppliers for modern slavery risks. Strengthening the Vendor Program is intended to assist Civeo Australia in identifying ethical and responsible vendors and, in doing so, help reduce the potential for modern slavery within our supply chains;
3. prioritising training programs for new key employees in the operational and supply chain teams, including providing education on procurement practices, governance and modern slavery awareness. This training is designed to empower employees to recognise and address modern slavery risks throughout the procurement process, fostering a vigilant and informed workforce; and
4. conducting corporate training sessions on Civeo Parent's global Corporate Code of Business Conduct and Ethics and global Human Rights Policy. These sessions are intended to reinforce awareness and compliance with ethical standards and responsible business practices across the business.

Overall, these efforts demonstrate Civeo Australia's dedication to continuous improvement and our proactive approach to mitigating modern slavery risks. Through policy reviews, enhanced vendor selection and training programs, Civeo Australia aims to continue its focus on identifying and seeking to reduce potential for modern slavery within their operations and supply chains.

MODERN SLAVERY RISK ASSESSMENT

During the Reporting Period, Civeo Australia engaged an external partner to complete an independent modern slavery risk assessment on Civeo Australia's supply chain. This risk assessment focused on Civeo Australia's top 50 suppliers, representing over 70% of Civeo Australia's total spend with all of its suppliers. This risk assessment provided Civeo Australia further insight into the following areas with respect to these suppliers:

- organisational structure and government reporting requirements in relation to modern slavery;
- policy and commitment frameworks;
- risk identification and mitigation strategies
- modern slavery due diligence practices;
- internal labour practices and outsourcing solutions;
- geographical diversity of their supply chains;
- performance indicators; and
- communication and reporting.

Civeo Australia will use this information to continue to improve our internal governance framework and our supply chain operations in the following ways during the next Reporting Period:

1. developing a more targeted audit and physical monitoring plan for our suppliers;
2. enhancing data sharing and capture requirements with our suppliers to provide greater reporting transparency; and
3. assessing the effectiveness of our current management plan in relation to modern slavery and ethical sourcing.

During the Reporting Period, Civeo Australia's supply chain representatives along with staff in our HSQE and operations teams also conducted over 70 face-to-face meetings or physical site audits with our suppliers, which included reviews of ethical sourcing methods and modern slavery risks.





LABOUR HIRE AGENCY REVIEWS

During the Reporting Period, Civeo Australia conducted a review of its external labour hire providers.

As a result of these reviews, and as noted above, Civeo Australia's supply chain team, in collaboration with our people and culture team, engaged with labour hire providers to establish a set of standardised wages and conditions across our labour hire provider portfolio. Labour hire providers must extend these wages and conditions to labour hire employees for work conducted on Civeo Australia owned or operated sites. These measures are intended to reduce the risk that Civeo Australia might be exposed to the risk of modern slavery practices through staff engaged through labour hire providers.

COUNTRY OF ORIGIN REVIEW

Through Civeo Australia's Vendor Program, we continue to assess the risk attributed to a specific supplier based on location of the supplier, country of origin of goods supplied, specifications of raw materials, category of goods supplied and total volume spend.

During the Reporting Period, Civeo Australia worked in collaboration with its food and beverage category team

and related suppliers to complete a holistic country of origin review against all products supplied to Civeo Australia in this category. This review provided valuable insight to Civeo Australia on the geographical diversity of its downstream supply chain and allowed Civeo Australia to review whether our supply chain partners were sourcing products from at risk regions.

Any products that were identified as being sourced from at risk regions were removed from Civeo Australia's supply chain and suitable alternative products were sourced.

TECHNOLOGY SOLUTIONS

During the 2021 reporting period, Civeo Australia identified the requirement for a more robust technology solution as part of its continuous improvement plan. Civeo Australia built on this during this Reporting Period to develop a detailed scope for this technology solution and conducted a market engagement activity to source an integrated technology solution to increase supply chain transparency, support exchange of ethical sourcing data and bring all of the supplier onboarding data together. As a result of this work, Civeo Australia has identified its preferred technology partner and will now focus on an implementation plan.



Assessing our effectiveness

ASSESSING OUR EFFECTIVENESS DURING THIS REPORTING PERIOD

Civeo Australia has a number of ways it assesses the effectiveness of its actions and measures for assessing and addressing modern slavery risks to ensure that it is striving for continuous improvement within the areas of ethical sourcing and modern slavery. Current practices that have been outlined during the previous 2021 reporting period, and which we continued to implement during the Reporting Period, are:

- a bi-annual modern slavery risk assessment conducted across Civeo Australia's entire supply chain;
- the external review of our policies and procedures, conducted annually by third-party auditors as part of Civeo Australia's ISO9001 certification;
- the use of contractual Key Performance Indicators by Civeo Australia to require suppliers to agree to comply with our policies and procedures, such as:
 - Civeo Parent's global Anti-Bribery Policy;
 - Civeo Australia's minimum standards and expectations; and
 - Civeo Australia's Vendor Program
- 360 feedback and review process conducted with senior stakeholders and suppliers;
- working with industry peers to share best practice and identify knowledge gaps; and
- collaboration with our suppliers, through targeted meeting topics, informal discussions and quarterly contractual reviews that are designed to share knowledge and foster and promote Civeo Australia's awareness of modern slavery and commitment to minimising the risk of these practices entering our supply chain.



FIRE WATER
HYDRANT SYSTEM
72,000 LITRES


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Future vision and closing statement

At Civeo Australia, we recognise the profound impact that modern slavery has on individuals and communities. We are committed to continuous improvement in identifying and seeking to address modern slavery risks by assessing and improving our practices, policies and partnerships within our operations and supply chains. Through transparent communication with suppliers, robust due diligence and regular training, we aim to create an environment that promotes awareness, accountability and a shared responsibility in addressing modern slavery.

We acknowledge that to achieve our objectives we must actively and transparently engage with our suppliers, customers, industry peers and stakeholders to collaborate and drive positive change across our supply chain.

To support these objectives Civeo Australia plans to commence the following actions in the 2023 reporting period:

1. Conducting supplier capacity building: Civeo Australia will seek to identify opportunities to collaborate with suppliers to provide capacity-building programs aimed at improving their understanding of modern slavery risks and building their capabilities to address those risks. This can include training sessions, workshops and sharing of best practices.
2. Implementing responsible sourcing practices: Civeo Australia will continue to develop and implement responsible sourcing practices that prioritise suppliers who demonstrate a commitment to ethical and sustainable business practices. This may include continuing to integrate modern slavery criteria into supplier selection and evaluation processes in a more refined and robust manner.
3. Engaging with industry initiatives and multi-stakeholder collaborations: Civeo Australia will look to participate in industry initiatives and multi-stakeholder collaborations focused on combating modern slavery. By working collectively with peers, NGOs and other relevant stakeholders, Civeo Australia can contribute to sector-wide efforts and share knowledge and resources.
4. Conducting independent audits: Civeo Australia plans to investigate engagement of independent auditors to conduct regular and rigorous audits of its own operations and supply chains to assess compliance with modern slavery standards and identify areas for improvement. These audits can provide an unbiased evaluation and help ensure the company's commitment to transparency.
5. Continuing to incorporate modern slavery clauses in contracts: Civeo Australia will continue to enforce the contractual requirements for its suppliers regarding compliance with modern slavery legislation and look to introduce more rigorous Key Performance Indicators addressing modern slavery.
6. Regularly reviewing and updating policies and procedures: Civeo Australia will continue to ensure that its policies and procedures regarding modern slavery are regularly reviewed and updated to reflect changing legislation, industry best practices and emerging risks. This demonstrates an ongoing commitment to addressing modern slavery.

By implementing these actions, Civeo Australia believes it can further strengthen its efforts to make a positive impact on individuals and communities throughout its supply chain by working to reduce modern slavery risks.

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 Executive Committee, supply chain, legal, HSQE and operational teams to prepare this statement.

This joint statement has been approved by the board of directors of each of Civeo Pty Ltd and Action Industrial Catering Pty on the 28 June 2023 and signed by Peter McCann, as director of Civeo Pty Ltd and Action Industrial Catering Pty Ltd.



Peter McCann

Director of Civeo Pty Ltd

Director of Action Industrial Catering Pty Ltd

28 June 2023



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