

# Modern Slavery Statement 2021

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*Monadelphous employees at BHP's US\$3.6 billion South Flank Project, Pilbara, Western Australia.*

# 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) (the Act), 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' second Modern Slavery Statement. It outlines the Company's governance, processes and activities undertaken during the year ended 30 June 2021. References in this report to 'year' or 'period' refer to the financial year ended 30 June 2021, unless otherwise stated.

## Overview

Modern slavery remains a global issue, affecting approximately 40 million victims around the world (as estimated by the United Nations and Walk Free Foundation). 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 undertook a range of actions to strengthen its modern slavery framework, associated processes and tools. Supplier management processes were enhanced to improve supplier engagement and transparency into supplier practices, and the Company focused on providing additional education to Monadelphous employees in identifying the signs of modern slavery.

### Key activities undertaken during the year ended 30 June 2021:

- Integration of recent business acquisitions into the Monadelphous modern slavery framework
- Development and implementation of additional modern slavery awareness training for employees in procurement roles or operating in high risk geographies
- Refinement of supplier screening processes
- Supplier modern slavery risk and maturity assessments

Monadelphous recognises that continual improvement is key to reducing the risk of modern slavery. The Company has a roadmap outlining its way forward and the actions required to ensure focus is maintained. During the year, the Company achieved its planned activities in accordance with its improvement roadmap.

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 New Zealand, 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 and depot facilities in Kalgoorlie, Karratha, Port Hedland, Newman, Tom Price, Darwin, Roxby Downs, Gladstone, Hunter Valley, Mackay, Bibra Lake, Bunbury, Chinchilla, Mudgee, Rutherford and Tianjin (China).

At 30 June 2021, Monadelphous directly employed 7,559 employees and had a total workforce, including subcontractors, of 7,791.



SANTIAGO  
CHILE

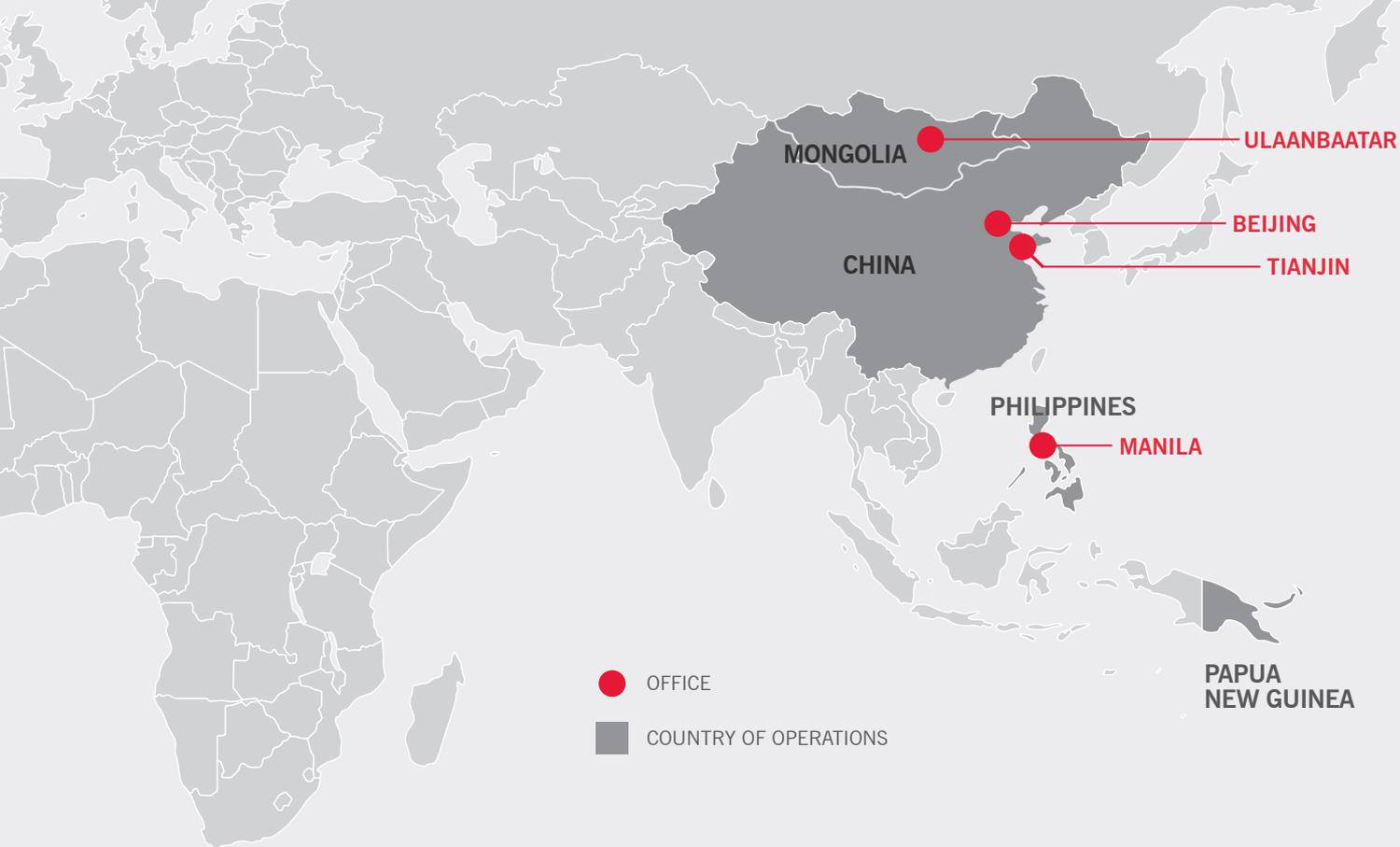
This statement applies to Monadelphous Group Limited (ultimate holding company), its wholly owned entities and the entities it controls. Refer to Appendix A for a listing of these entities as at 30 June 2021.

### 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 2021, the Company maintained a supplier database of over 6,000 suppliers, with the majority (in excess of 90 per cent) of its annual supplier spend of approximately \$655 million occurring with suppliers and subcontractors located in Australia. Additional spend countries include China (4 per cent), Papua New Guinea (2.5 per cent), the Philippines (0.6 per cent), Mongolia (0.5 per cent) and New Zealand (0.5 per cent).

The Company sources a diverse range of goods and services. The top categories of supply by spend for the year ended 30 June 2021 were:

- Transportation and freight
- Construction materials and consumables
- Workforce labour hire
- Plant and equipment hire and maintenance
- Professional engineering services

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

### China

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- Construction materials and consumables:
  - Steel
  - Lifting equipment
- Plant and equipment
- Freight
- Building maintenance and repairs
- Travel and accommodation

### Mongolia

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- Subcontractor construction services
- Plant and equipment hire and maintenance
- Human resources development and recruitment
- Freight

### New Zealand

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- Engineering consultancy and design
- Construction materials and consumables:
  - Civil and concrete materials
  - General construction consumables
- Office equipment
- Human resources services
- Freight
- Plant and equipment hire and maintenance
- Piping manufacture

### Papua New Guinea

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- Engineering consultancy and design
- Workforce labour hire
- Freight
- Plant and equipment hire and maintenance
- Travel and accommodation

### Philippines

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- 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 \$678 million (98 per cent) of its supply chain 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.

However, some parts of Monadelphous' operations utilise labour through third party providers and subcontractors. The Company may or may not have direct supervision over these third-party workforces and transparency over the terms and conditions of employment. The risk of modern slavery occurring may 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
Mongolia operations (Monadelphous Mongolia LLC)	Provider of construction services in the Mongolian industrial construction industry utilising local Mongolian subcontractors.
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 (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. The risk assessment criteria includes industry, geography and spend. During the year, these criteria were refined, applying learnings gained from screening and assessments conducted in the previous year.

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

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 China, India, Mongolia, Papua New Guinea, the Philippines and Thailand, 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. Implemented in the prior year, the framework continues to be enhanced to ensure the ongoing assessment of modern slavery risks and their impact on the Group, with policies and procedures updated accordingly to address any changes. 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. During the year, the framework was applied to the Company's Chile based operations (controlled entities comprising Buildtek SpA, MAQrent SpA, Monadelphous Chile SpA) acquired in November 2019, with processes updated as required.

## Stakeholder consultation and collaboration

In the initial development of its modern slavery framework in the prior year, consultation was undertaken with both corporate and operational stakeholders across the Group to ensure pertinent risks were identified and appropriately considered. Consultation activities included stakeholder interviews and self-assessments of the Company's Australian and overseas operations. Additionally, a third party provider with expertise in supply chain risk was engaged and a range of modern slavery organisations consulted, in the development of the framework.

The Company's commitment and expectations in regards 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.

To maintain suitability, the framework is reviewed in consultation with stakeholders across the business and revised on an annual basis. The Company continues to engage the same third party provider to complete regular supplier due diligence and general risks screening. Further, Monadelphous maintains its connection with several human rights advocacy groups, periodically validating its approach and analysing data in the maintenance of its framework.

## 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 chains
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 refreshed to align with enhancements to the Company's acceptable workplace behaviour and equal employment opportunity policies. The Company also improved 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.
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 the sustainable development of its business through the effective management of economic, environmental and social risks and opportunities.
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 is 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, specific modern slavery awareness training was developed and rolled out to Company employees operating in high risk locations, as well as to those frequently interacting with suppliers and subcontractors. This training was designed with the intention to assist Company employees in identifying the signs of modern slavery, and the actions required to be taken if a suspected or actual case of modern slavery is identified.

## Customer engagement

Customer collaboration continues to provide the Company with valuable insights into current industry labour and human rights practices and effective approaches in investigating, controlling and responding to modern slavery related 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 reporting requirements.



*A Monadelphous employee commissioning a newly installed switchboard at BHP's Newman Operations, Newman, Western Australia.*

## 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 its supply chains.

During the year, the hotline was enhanced to support multiple languages and improve accessibility for the Company's overseas operations.

## Supplier contractual terms and conditions

In the prior year, Monadelphous updated its suite of group procurement and subcontract terms and conditions templates to include 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.

The revised templates continue to be implemented, replacing existing supplier and subcontractor contractual agreements to ensure contractually binding compliance with applicable labour rights laws and practices.

## 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.

Whist focus to date has been on its direct supply chain, Monadelphous acknowledges the potential for modern slavery risks to reside within its indirect supply chains. The Company has identified an action within its continuous improvement roadmap to further collaborate with its direct suppliers to assess these risks.

## Supplier due diligence screening

In the prior year, Monadelphous applied its newly developed modern slavery risk assessment criteria, which is based on industry category and geography, to its existing supplier database, to identify high risk suppliers for detailed supplier due diligence screening. Monadelphous continued this approach during the year, undertaking further due diligence assessments of suppliers identified as high and medium risk. The screening was 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 transparency of supplier modern slavery practices, Monadelphous requires suppliers to complete a modern slavery self-assessment questionnaire (SAQ) during onboarding. During the year, an online version of the SAQ was developed within the Company's supplier onboarding platform, incorporating risk based questioning which is adaptive based on the responses. The updated SAQ platform will go live in early FY22 and will replace the current manual questionnaire.

Supplier responses to the SAQ indicate varying ranges of modern slavery awareness, appreciation and maturity of controlling processes. Suppliers with operations based within Australia generally demonstrated greater awareness and transparency of modern slavery related risks, whereas a notable portion of suppliers based overseas, more specifically those located within developing countries, regularly provided responses indicating low levels of transparency and maturity of practices to mitigate modern slavery related risks. Any concerns that are identified during the process result in further direct supplier engagement and education to improve transparency and influence of supplier practices.

### **Periodic supplier assessment**

Acknowledging that a supplier's risk profile may change over time, the Company expanded its supplier assessment process to include periodic assessment of existing suppliers which trigger risk and spend thresholds.

During the year, processes were updated to periodically identify high risk and spend suppliers and assess for emerging modern slavery risks. Suppliers which meet the Company's assessment criteria, and that have not recently been assessed through other means, are subject to review and application of treatment strategies in accordance with the Company's modern slavery framework.

### **Treatment strategies**

Monadelphous applies treatment strategies to address concerns identified during supplier onboarding assessments, periodic supplier assessments and due diligence activities. During the year, the nature of identified concerns largely necessitated the clarification of supplier SAQ responses and practices, which also provided an opportunity 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 year, suppliers were routinely contacted to seek clarity and confirmation in relating to their SAQ responses.

Education – *raising supplier understanding and awareness of modern slavery risks.* Engaging with suppliers regarding the SAQ or supplier code of conduct regularly included elements of education regarding modern slavery risks and importance of mitigation strategies.

Enhanced assessment – *additional supplier assessment activities such as onsite focused audits of labour rights and hiring practices.*

Relationship termination – *where zero-tolerance concerns are identified.* 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.

### Case study – Workwear supply agreement

The Company currently maintains a workforce in excess of 7,000 people, a large portion of which are issued with site clothing as part of their personal protective equipment (PPE). During the year, the supply of workwear went out to tender.

Recognising the prevalence of labour rights abuses within the textiles and garment manufacturing industries, the Company was deliberate in its approach to not contribute to instances of modern slavery through its purchase of employee workwear. To aid this objective, the Company required prospective suppliers to provide detailed disclosure around the identification and mitigation of modern slavery risks within their own operations and their supply chains. The ability of the supplier to demonstrate a mature appreciation of modern slavery risks, as well as established internal controls and diligent supply chain assessment processes, was a critical element in the evaluation of supplier suitability and alignment to Monadelphous values.

## Measuring effectiveness

The Company's focus during the year has been on the application and refinement of its modern slavery framework and associated processes. The Company consults with internal stakeholders on an annual basis to evaluate the effectiveness of its processes in identifying and addressing modern slavery risks. Where appropriate, stakeholder feedback and improvement suggestions are incorporated into the modern slavery framework and associated processes. The Company also evaluates the suitability of its approach by benchmarking its framework against guidance provided by human rights advocacy groups, its customers and the investment community.

An independent review of the Company's modern slavery framework is currently underway, with the outcome of the review to be reported in future modern slavery statements.

## Continuous improvement

Monadelphous is 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.

### Planned activities FY22 and beyond

- Continued roll out of procurement and subcontract conditions templates inclusive of clauses addressing modern slavery and human rights
- Further emphasis of treatment strategies when engaging suppliers regarding concerns
- Review of the modern slavery framework and associated processes by Group Assurance to assess its effectiveness in identifying and addressing risk
- Further review of internal recruitment practices and labour conditions in high risk locations and industries
- Introduction of modern slavery assessment criteria into supplier compliance auditing processes
- Completion of onsite supplier assessments for high risk / high spend suppliers
- Ongoing review and enhancement of modern slavery framework and associated policies and procedures
- Implement processes to assess modern slavery risks within indirect supply chain, through collaboration with direct suppliers

## Approval

Approved by the Board of Monadelphous Group Limited.



**John Rubino**

Chair

22 November 2021

## 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 2021:

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
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

Note, 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).

## 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 2021
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 (pages. 6-7)
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. 11)
Describe the process of consultation with an entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Introduction Stakeholder consultation and collaboration (page. 7)
Provide any other relevant information	Continuous improvement (page. 11)