



Modern Slavery Statement

FY25

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This 6th Statement is made in accordance with the *Modern Slavery Act 2018* (Cth) (“the Act”) and outlines the steps taken to identify, assess and address risks of modern slavery in Civmec’s operations and supply chains, including governance processes for the financial year ending 30 June 2025 (“FY25”).



Introduction

Pursuant to the modern slavery legislation, modern slavery has a broad meaning that encompasses slavery, servitude, forced labour, and human trafficking. Civmec Limited (“Civmec”) is a dual-listed public company on the Australian Securities Exchange and Singapore Exchange Securities Limited. Civmec and its subsidiaries (the “Civmec Group”, or the “Group”) are committed to upholding the highest standards of integrity and ethical values and believe that respecting and promoting human rights is one of the main ways to maintain and enhance its reputation, vision and values.

Civmec Group, its board of directors (the “Board”), senior executives, and employees (“Civmec People”) will take action to prevent any modern slavery activities within its operations and supply chains, and will not knowingly support or conduct business with any organisation involved in such activities.

In FY25, Civmec advanced its modern slavery risk management through measurable actions. The implementation of the Felix digital vendor management platform in January 2025 enabled systematic supplier assessment, with 88 vendors completing due diligence questionnaires by year end. We delivered targeted training to staff in high-risk roles. The training improved awareness and strengthened capability to recognise and respond to modern slavery risks. These actions demonstrate our commitment to continuous improvement in preventing and addressing modern slavery across our operations and supply chains.

The responses to the mandatory reporting criteria of the modern slavery legislation are shown in the table below:

Modern Slavery Legislation	Section
Identify the reporting entity	Introduction Page 3
Describe the reporting entity’s structure, operations and supply chains	Structure and Scope Page 4 Operations and Supply Chains Page 5
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Due Diligence Page 8
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Due Diligence Page 8
Describe how the reporting entity assesses the effectiveness of these actions	Assessing the Effectiveness of Actions Being Taken Page 11
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement)	Control of all entities is by a single management structure and therefore this criterion is not relevant to Civmec

STRUCTURE AND SCOPE

This statement is a joint modern slavery statement on behalf of all reporting entities within Civmec Group as listed below and will outline the steps Civmec Group has taken to identify, monitor, review, and mitigate the risk of modern slavery.

In September 2024, Civmec completed a significant corporate restructuring through its re-domiciliation from Singapore to Australia. This transition established Civmec Limited as the Australian parent entity, strengthening our governance framework and aligning our corporate structure with our operational base. All controlled entities operate under unified Australian governance standards, enhancing our ability to implement consistent modern slavery risk management across the Group.

The following table illustrates all controlled subsidiaries owned by Civmec:

Name of Entity	Principal Activities	Country of Incorporation	Equity Held by the Group	
			2025 %	2024 %
Held by Civmec Ltd				
Civmec Construction & Engineering Singapore Pte Ltd*	Asset holding company	Singapore	100	100
Held by Civmec Singapore Ltd				
Civmec Construction & Engineering Pty Ltd**	Engineering and construction services	Australia	100	100
Held by Civmec Construction & Engineering Pty Ltd				
Civmec Holdings**	Asset holding company	Australia	100	100
Multidisciplinary Solutions Pty Ltd**	Asset holding company & labour supply	Australia	100	100
Civmec Pipe Products Pty Ltd**	Asset holding company	Australia	83.5	83.5
Civmec Electrical and instrumentation Pty Ltd**	Electrical services	Australia	100	100
Forgacs Marine and Defence Pty Ltd**	Marine & defence services	Australia	100	100
Civmec Construction & Engineering Africa Pty Ltd***	Asset holding company	Mauritius	100	100

* Audited by Moore Stephens LLP, Singapore, ** Audited by Moore Australia (WA) Pty Ltd, Australia, *** Reviewed by Moore Australia (WA) Pty Ltd, Australia, for the purpose of consolidation

Post-reporting period, on 1 July 2025, Civmec acquired 100% of Luerssen Australia Pty Ltd, with approximately 180 employees transferring to the Group. These workers have been integrated into Civmec's employment framework, ensuring continuity of fair employment conditions and inclusion in our modern slavery risk management systems.



Managing Modern Slavery Implications of the Acquisition

This acquisition represents a material expansion of Civmec’s operations, bringing an additional workforce and inherited supply chain relationships into the Group. Civmec is committed to ensuring that modern slavery risk management extends consistently across all operations, including those acquired through the Luerssen Australia transaction.

The integration of Luerssen Australia into Civmec’s modern slavery framework will be managed systematically during FY26. This includes assessing inherited supplier relationships through the same due diligence processes applied across Civmec’s supply chain, ensuring transferred employees receive modern slavery awareness training, and confirming that grievance mechanisms are accessible to all workers across the enlarged Group.

Civmec continues to collaborate with all stakeholders (including clients, contractors, suppliers, subcontractors, consultants and joint venture partners) to develop and implement management plans and procedures which aim to reduce the risk of modern slavery at its operations and supply chains, and ensure its compliance with the modern slavery legislation.

This statement addresses Civmec’s obligations under the *Modern Slavery Act 2018* (Cth). Where Civmec operates in other jurisdictions or where contractual obligation require compliance with additional modern slavery or human trafficking legislation, Civmec ensures its practices meet or exceed the applicable standards. The Civmec Group applies the highest applicable standard across its operations.

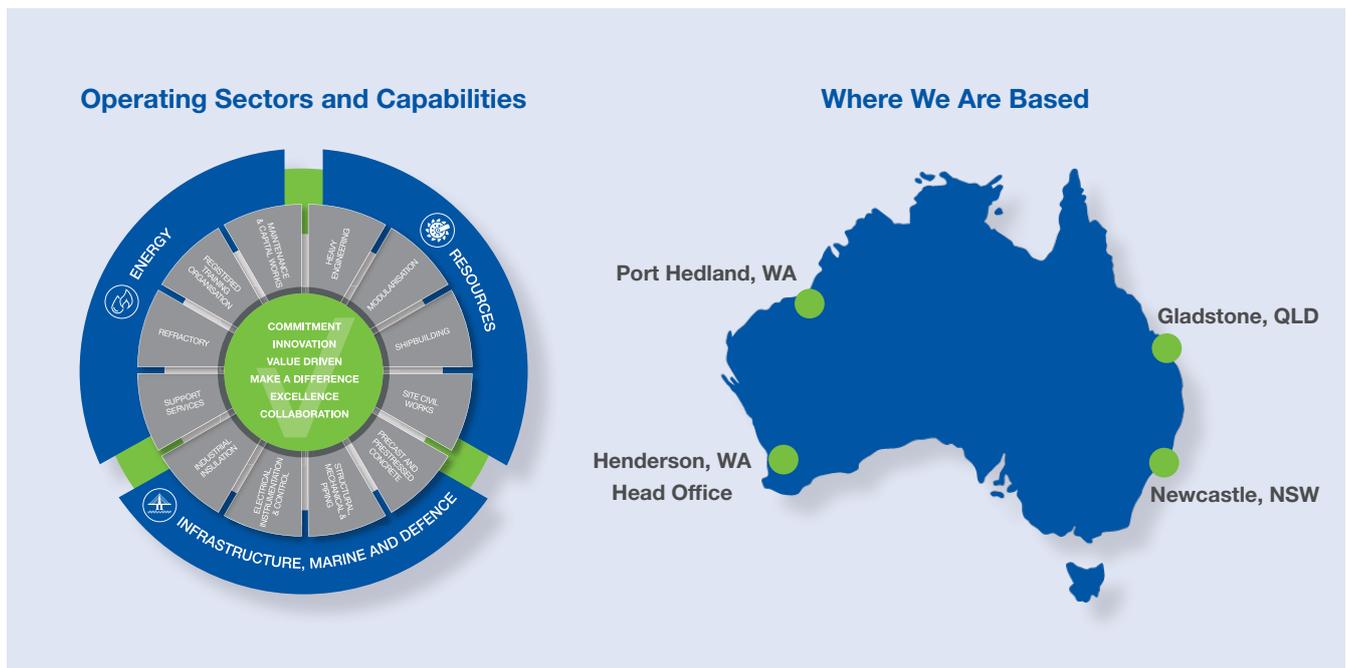
OPERATIONS AND SUPPLY CHAINS

The Civmec Group undertakes end-to-end construction, complex manufacturing from its own facilities, and maintaining clients’ assets on site.

With a corporate office based in Henderson, the Group’s main manufacturing facilities are located in Henderson and Newcastle. In addition, a regional facility is located in Gladstone, and the recently completed facility in Port Hedland.

We employ around 3,350 people directly at any given time. The majority of our workforce is engaged under collective agreements or award conditions, providing fair treatment and strong protections against exploitation.

These arrangements reflect our commitment to safeguarding workers and continuously improving our approach to preventing modern slavery risks across our operations and supply chains.





In FY25, the Group spent just under \$431 million on suppliers. Approximately 99% was spent within Australia, and 1% was international spend. As such, Civmec has a lower risk of modern slavery incidences than if most supplier spend was overseas. Despite this, there is still a risk of modern slavery occurring with Australian suppliers and also for lower tiers of the supply chain that source products and services from overseas.

In total Civmec Group engaged 1,438 suppliers and subcontractors for procuring products and services in FY25.

Civmec's top areas of supplier spend in FY25 include:

- Steel for fabrication
- Recruitment and labour hire services
- Concrete
- Consulting services
- Electrical suppliers and services
- Welding services
- Plant hire
- Transport

However, it is important to note that high spend does not always equate to high-risk of modern slavery.

OUR APPROACH

Civmec's approach to modern slavery is in line with the *United Nations Guiding Principles on Business and Human Rights* to seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services through our suppliers and partners, even where we have not contributed to those impacts. Our approach focuses on strong policy and governance, through due diligence on modern slavery risks in our operations and supply chain, and ensuring access to remedy if any instances of modern slavery are identified.

Policy and Governance

Civmec Group monitors and addresses modern slavery issues in its operations and supply chains under various policies, including:

- Code of Conduct
- Equal Opportunity Policy
- Australian Industry Participation Policy
- Modern Slavery Policy
- Sustainability Policy

(These policies are available on Civmec’s corporate website at <https://www.civmec.com.au/approach/policies/>)

All Civmec employees, contractors and suppliers are expected to comply with the above policies.

Civmec’s governance of modern slavery and other environmental social and governance (ESG)-related issues is presented in Figure 1 below. The Sustainability Committee maintains management oversight on the sustainability agenda for Civmec, monitoring progress in key ESG pillars and ensuring the programs and initiatives remain aligned with Civmec’s Strategy.

The Sustainability Committee expanded in FY24 and was maintained in FY25 to include the Pre-contracts Commercial Manager, Chief Financial Officer, and a Project Manager from the operations team. This broadened membership diversifies perspectives and strengthens the committee’s expertise. The Committee has a direct line of communication with the Executive Team, and material issues are escalated to the Board’s Risk and Conflicts Committee.

In FY25, the Committee met quarterly to review modern slavery risk management progress, with specific focus on Felix platform implementation, training rollout, and supplier risk assessment outcomes. The Board’s oversight was strengthened with the appointment of three new independent directors in late 2024, enhancing expertise in risk management and sustainability.

Key Activities Undertaken in FY25

- Implementation of Felix digital vendor management platform in January 2025
- Completion of enhanced due diligence questionnaires by 88 vendors through Felix platform
- Delivery of targeted modern slavery training to 63 staff in high-risk roles
- Strengthening of contractual clauses in all new agreements above \$100,000

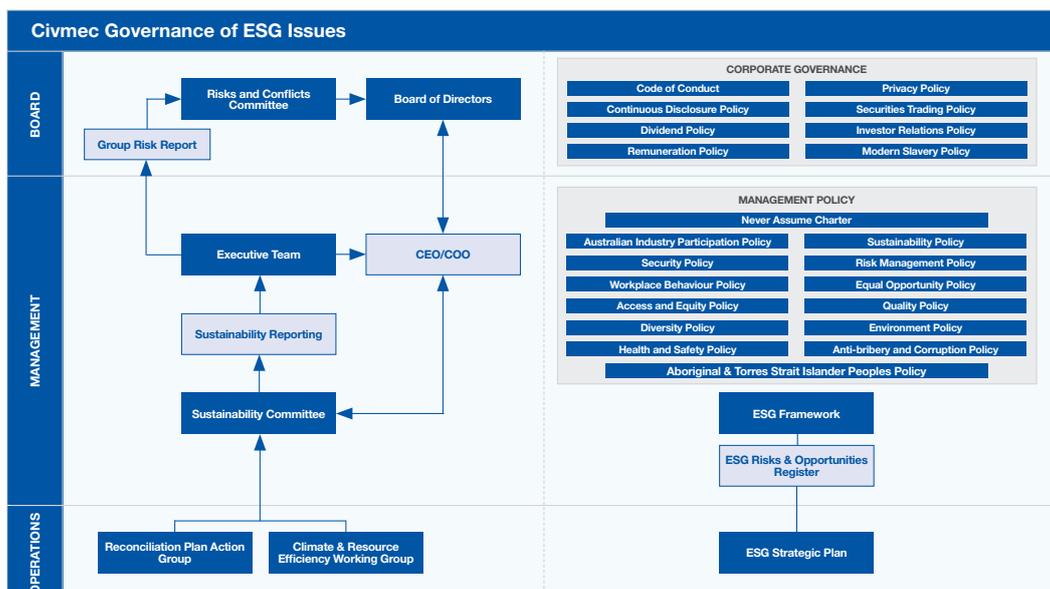


Figure 1. Civmec Governance of ESG

Due Diligence

IDENTIFYING RISKS OF MODERN SLAVERY PRACTICES IN OPERATIONS

The majority of Civmec's Group workforce is employed directly under contracts that meet or exceed applicable employment legislation. This direct engagement reduces the potential for modern slavery risks within our operations.

Civmec recognises that exposure to modern slavery risks may arise through the use of labour hire companies and recruitment agencies that source employees overseas. While pre-qualification assessments and contractual terms are in place, we acknowledge that potential risks remain and continue to monitor and manage them as part of our broader governance framework. Spot audits are conducted on labour hire companies to ensure that employees are compensated in line with applicable enterprise bargaining agreements. Labour hire company employees have access to Civmec's whistleblowing service to report any instances of underpayment. In FY25 no such incidents were reported.

To strengthen safeguards, all labour hire providers are required to complete enhanced due diligence through the Felix platform. This includes verification of labour hire licensing, demonstration of established VEVO compliance processes, and evidence of fair payment practices. In FY25, we conducted verification checks on our major labour hire providers, confirming compliance with award conditions and visa requirements.





IDENTIFYING RISKS OF MODERN SLAVERY PRACTICES IN THE SUPPLY CHAIN

Civmec continues to draw on information from reputable institutions, including Walk Free, the Australian Human Rights Commission, the Australian Institute of Criminology, Social Responsibility, and Fair Supply, to better understand modern slavery risks in our supply chain. This ongoing research helps identify areas of higher exposure, including countries with a greater prevalence of modern slavery and sectors where the provision of goods and services carries increased risk. In FY25, we also incorporated insights from the recent review of the Modern Slavery Act, further strengthening our understanding and informing our approach to risk management.

As part of furthering our understanding of risks in the supply chain, Civmec undertook a review of the Bureau of International Labor Affairs 2024 list of goods produced by child labour or forced labor, and updated its list of at risk goods, as follows:

- Personal Protective Equipment (PPE) and uniforms that are produced in Bangladesh, Burma, China, India, Malaysia or Vietnam
- Solar panels produced in China
- Aluminium associated with electrical parts and electronic equipment produced in China
- Steel products potentially sourced from facilities with poor labour practices
- Electronics and electrical components with complex, opaque supply chains

The Civmec Group has also identified that it may encounter modern slavery issues through the procurement of the following services:

- Cleaning services
- Maintenance services
- Unskilled labour services
- Security services

Civmec uses the Felix platform to strengthen supplier due diligence and manage modern slavery risks in its supply chain. Through Felix, suppliers complete a questionnaire that identifies whether they operate in high-risk regions or provide high-risk products. The platform's automated risk-flagging process highlights suppliers that may present elevated risks based on geographic location, sector, or product categories. These suppliers are then subject to further review. Where satisfactory evidence of controls is provided, suppliers are confirmed as compliant. Where risks remain, suppliers are placed under enhanced monitoring and engagement to ensure appropriate safeguards are in place.

During FY25, Civmec employees, contractors and labour hire attended the General Induction program, which incorporated principles of modern slavery into the discussion on the Code of Conduct. In addition, the dedicated e-learning module developed for Procurement, Human Resources and Project Managers was rolled out during the year. This targeted training strengthened awareness and capability in roles with higher exposure to modern slavery risks.



Access to Remedy

Civmec recognises the importance of providing clear pathways for reporting and remediation of potential modern slavery concerns. Employees have access to established mechanisms, including the Grievance and Dispute Resolution Procedure (10-HR-ER-PRO-0012) and the Whistleblowing – Fraud and Corruption Procedure (10-HR-AD-PRO-0001). Both procedures maintain confidentiality and outline processes for redress.

The Whistleblowing Procedure includes an independently administered hotline, STOPline, which allows staff and third parties to report serious misconduct. STOPline provides immediate notification and quarterly reports to the Board Audit Committee, ensuring oversight and accountability. Civmec also upholds the right of freedom of association, enabling employees to raise concerns through trade unions. These avenues also contribute to remediation by building capacity and raising awareness about rights and remedies.

During FY25, no potential or actual incidents of modern slavery were reported through these mechanisms. While this may indicate effective preventative measures, Civmec acknowledges that low awareness of reporting channels among subcontractor workers could also contribute to under-reporting. This insight informs our ongoing efforts to strengthen communication and accessibility of grievance mechanisms.

Assessing the Effectiveness of Actions Being Taken

Understanding and assessing the effectiveness of actions undertaken to combat modern slavery is critical to managing risks in a systematic manner. As a large enterprise operating across multiple sectors, Civec recognises the importance of transparent reporting, measurable outcomes, and continuous improvement.

YEAR-ON-YEAR PROGRESS: FY24 TO FY25

Area	FY24 Approach	FY25 Approach
Supplier assessment	Manual questionnaires, limited coverage	Felix platform implemented – 88 vendors completed enhanced due diligence by 30 June 2025
Risk identification	Basic risk categorisation	Systematic risk scoring enabling differentiated supplier management-high-risk suppliers identified through baseline screening subject to closer review
Labour hire oversight	Separate assessment process	Labour hire companies integrated into Felix-consistent risk visibility across direct and contingent workforce
Training	Ad-hoc awareness sessions	Structured e-learning program-35 staff completed targeted modern slavery training with post training assessments (91% pass rate)
Documentation	Decentralised records	Centralised evidence base in Felix enabling ongoing monitoring and audit trail

In FY25, Civec strengthened its assessment capability through the introduction of the Felix platform. By 30 June 2025, 88 vendors had completed enhanced due diligence questionnaires, establishing a clear baseline for ongoing monitoring. High-risk suppliers identified through baseline screening were subject to closer review, with vendors flagging compliance concerns required to complete supplementary questionnaires demonstrating satisfactory evidence of controls while others remain under monitoring where appropriate.



This represents a significant improvement from FY24, where supplier assessments were conducted manually without a systematic framework for risk differentiation or ongoing monitoring. The Felix implementation enables Cvmec to:

- Maintain current risk profiles for active suppliers
- Track due diligence completion rates and identify gaps in coverage
- Escalate high-risk suppliers for enhanced monitoring
- Retain evidence of supplier responses for audit purposes

Looking forward, Cvmec will explore options to extend visibility beyond Tier 1 – (defined as direct suppliers with whom Cvmec has a contractual relationship) - as part of its broader due diligence evolution. Tier 2 suppliers, in contrast, are those who provide goods or services to Cvmec's Tier 1 suppliers and therefore sit deeper within the supply chain.

Recruitment practices were also strengthened in FY25, with labour hire companies added into Felix to ensure they are subject to the same modern slavery due diligence as other suppliers. This integration provided visibility over recruitment practices and enabled Cvmec to monitor risks consistently across both direct suppliers and labour hire providers.

In FY24, labour hire arrangements were assessed separately from supplier due diligence, creating potential blind spots. The FY25 integration ensures labour hire providers are required to demonstrate compliance with worker protection standards such as prohibiting recruitment fees and passport-withholding practices, with evidence retained in a centralised system.

Training outcomes provided another measure of effectiveness. In FY25, 35 staff members completed targeted modern slavery training, representing 51% of participants. Post-training assessments confirmed strong comprehension, with participants demonstrating improved confidence in recognising indicators and engaging with suppliers on labour practices.

This structured approach represents maturation from FY24, where modern slavery awareness was addressed through general compliance training rather than targeted capability building for procurement, human resources, and project management personnel directly involved in supply chain and workforce oversight.

Audit and compliance monitoring were strengthened through contractual requirements. All new contracts above \$100,000 included specific modern slavery compliance clauses in FY25, embedding standards into procurement processes. In the coming year, monitoring will be expanded to include remediation processes, grievance mechanisms, and outcome-focused measures that track supplier engagement and audit coverage for high-risk categories.

Cvmec has established clear performance indicators to measure the effectiveness of its actions. In FY25, supplier due diligence was measured through the number of vendors completing Felix questionnaires, with 88 submissions recorded by 30 June 2025. Training outcomes were assessed through completion rates, with 35 of 68 targeted staff participating, and comprehension confirmed through post-training assessments. Contract compliance was monitored through the inclusion of modern slavery clauses in all new contracts above \$100,000.

These outcomes demonstrate progression from FY24's manual ad-hoc approach to a systematic framework capable of scaling as Cvmec's operations expand, including through acquisitions such as Luerssen Australia.

AREAS FOR CONTINUED DEVELOPMENT

While FY25 delivered significant improvements in systematic risk identification, Civmec recognises opportunities for continued development in FY26 and beyond:

1. Expanding coverage: Extend supplier assessment to achieve 100% Tier 1 coverage and commence Tier 2 assessment for critical high-risk categories
2. Outcome measurement: Develop metrics that track not only process implementation (questionnaires completed, training delivered) but also outcomes (risks identified and addressed, controls verified, issues remediated)
3. Stakeholder engagement: Enhance engagement with suppliers, workers and external stakeholders to inform risk assessment and ensure effectiveness from multiple perspectives.

These development areas reflect Civmec's commitment to continuous improvement, building on the FY25 foundation to deliver increasingly mature and effective modern slavery risk management.

Communication and Consultation

Civmec recognises that effective communication and consultation are essential to minimising modern slavery risks across its workforce and supply chain. Key internal stakeholders include the Board, senior executive management, Project Managers, and the Commercial, Procurement and Human Resources teams. Managing modern slavery risks requires collaboration among all relevant stakeholders, both internal and external, supported by timely and accurate information sharing.

In FY25, consultation processes were embedded into governance and operations through quarterly Sustainability Committee meetings, regular updates to the Board Risk and Conflicts Committee, cross-functional working groups supporting the implementation of the Felix platform, and direct engagement with high-risk suppliers. These activities ensured that modern slavery considerations were consistently integrated into decision-making and supplier management, strengthening Civmec's ability to manage risks effectively and reduce exposure across its operations and supply chains.

Looking ahead, Civmec will expand consultation to subcontractor groups and industry forums in FY26, broadening awareness and collaboration across the supply chain and ensuring that communication channels remain accessible, transparent and outcome focused.





Conclusion

Civmec Group remains committed to eradicating all forms of modern slavery across its operations and supply chains. We continue to strengthen strategies and actions to identify, mitigate and prevent modern slavery risks, and this statement reflects the progress achieved to date. By publishing this report, Civmec demonstrates transparency and accountability in its ongoing efforts.

Building on FY25 progress, our priorities for FY26 include completing supplier onboarding to the Felix platform, increasing training completion rates to 90% among targeted staff, and developing outcome-focused performance metrics to measure tangible risk reduction. These initiatives will further embed modern slavery risk management into our operations and supply chains.

This statement for Civmec Group was approved by the Board of Civmec Limited as the parent entity on XX December 2025.

A handwritten signature in black ink, appearing to read 'Patrick Tallon'. The signature is stylized and cursive.

Patrick Tallon

Chief Executive Officer and Director of Civmec Limited

December 2025



civmec.com.au