



Engineering Success

Modern Slavery Statement

FY24

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This 5th statement is made in accordance with the *Modern Slavery Act 2018 (Cth)* and *Modern Slavery Act 2018 (NSW)* (“Modern Slavery Legislation”) and outlines the steps taken to address Modern Slavery risks, including governance processes and progress for operations and supply chains for the financial year ending 30 June 2024 (“FY24”).



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” or the “Company”) is a dual-listed public company on the Australian Securities Exchange (the “ASX”) and Singapore Exchange Securities Limited (the “SGX-ST”). 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 key 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.

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 3 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 Pages 7 and 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 Pages 7 and 8
Describe how the reporting entity assesses the effectiveness of these actions	Assessing the Effectiveness of Actions Being Taken Page 9
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Control of all entities is by a single management structure and therefore this criteria is not relevant to Civmec
Provide any other relevant information	

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.

The following table illustrates all controlled subsidiaries owned by Civmec:

			Equity held by the Group	
Name of Entity	Principal Activities	Country of Incorporation	2024 %	2023 %
Held by Civmec Ltd				
Civmec Singapore Ltd*	Asset holding company	Singapore	0	0
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**	Engineering 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

(1) Civmec Australia Ltd acquired Civmec Ltd through a scheme of arrangement on 4/09/2024. Subsequent to this, Civmec Ltd was renamed to Civmec Singapore Ltd and Civmec Australia Ltd was renamed to Civmec Ltd.

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 in its operations and supply chains, and ensure its compliance with the Modern Slavery Legislation.

Aside from complying with the *Modern Slavery Act 2018 (Cth)* and *Modern Slavery Act 2018 (NSW)*, the Civmec Group must also comply with other jurisdictional legal requirements regarding Modern Slavery, including Singapore's *Prevention of Human Trafficking Act 2014*, and, if a particular jurisdictional requirement imposes a higher standard than is described in this statement, Civmec Group will comply with the higher standard.

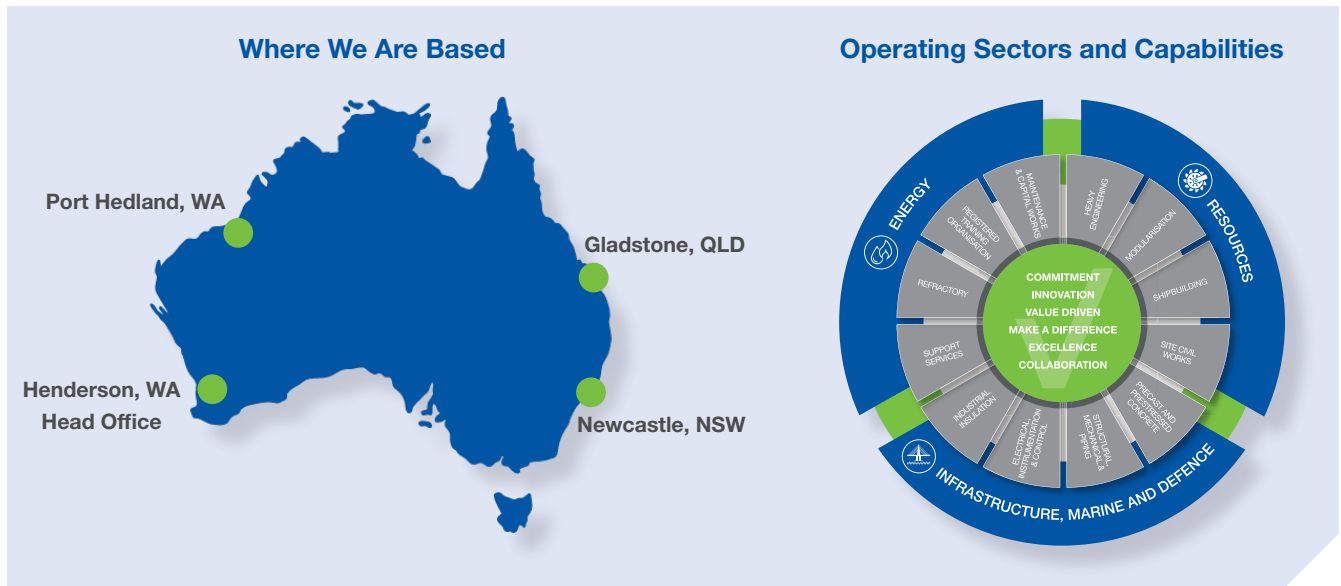


OPERATIONS AND SUPPLY CHAINS

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.

Employing around 3,000 employees directly at any given time, the proportion of labour hire across the business is approximately 12%.



In FY24, the Group spent just under \$535 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 of the supplier spend was overseas. Notwithstanding 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 1568 suppliers and subcontractors for procuring products and services. Top areas of supplier spend in FY24 included:

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



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 by their business relationships, even if they have not contributed to those impacts*. Furthermore, the approach centres on policy and governance, due diligence on Modern Slavery in our operations, and supply chain and access to remedy if forms 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
- Local 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.

Key Activities Undertaken in FY24

- Review and updating of goods at risk of Modern Slavery.
- Updating supplier pre-qualification process with a more comprehensive set of questions to assist in assessing potential supplier risk.
- Due diligence undertaken of supplier, related to a one-off purchase of at risk goods.
- Development of Modern Slavery Training for specific roles with responsibilities with the potential to identify Modern Slavery.

Civmec's governance of Modern Slavery and other ESG related issues is presented in figure one 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 the Company Strategy.

Membership of the Sustainability Committee expanded during FY24 to include the Pre-contracts Commercial Manager, Chief Financial Officer, and a project manager from our operations team, and thereby diversify the perspectives and areas of expertise of the committee. The Committee has a direct line of communication to the Executive Team and any material issues are passed through to the Board's Risk and Conflicts committee.

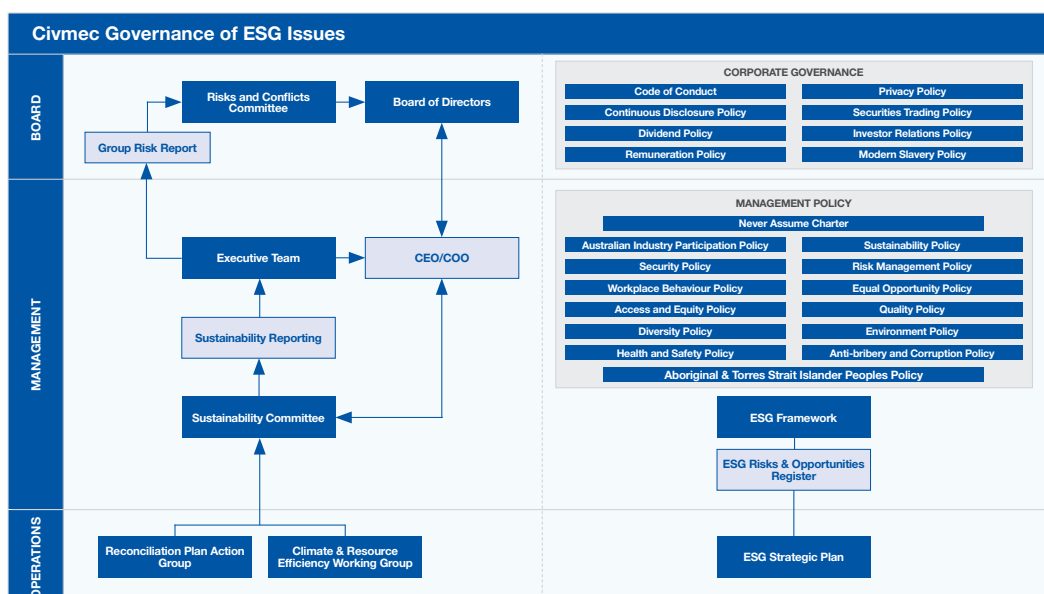


Figure 1. Civmec Governance of ESG



Due Diligence

IDENTIFYING RISKS OF MODERN SLAVERY PRACTICES IN OPERATIONS

The majority of Civmec Group's workforce is employed directly and on an employment contract which meets or exceeds the applicable employment legislation, and this direct engagement therefore will reduce the potential for direct cause of Modern Slavery risks within the Group's operations.

An area in which the Civmec Group could possibly encounter Modern Slavery issues is through the choice of labour hire companies and recruitment agencies who source employees overseas. Despite the pre-qualification assessments and contractual terms related to Modern Slavery, Civmec recognises the potential exposure to Modern Slavery in this area.

IDENTIFYING RISKS OF MODERN SLAVERY PRACTICES IN THE SUPPLY CHAIN

In order to understand the context for Modern Slavery in the supply chain, the Civmec Group have drawn information and data from reputable institutions, including Walk Free Organisation, the Australian Human Rights Commission, Social Responsibility, and Fair Supply. This research has assisted the Group in identifying those areas of the supply chain more exposed to Modern Slavery, including improving an understanding of countries which have a higher prevalence of Modern Slavery and in which the provision goods and services is known to carry a higher risk of Modern Slavery.

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 labour, and updated its list of at risk goods, as follows:

- Personal Protective Equipment (PPE) and uniforms that are produced in Bangladesh, Myanmar, China, India, Malaysia or Vietnam
- Solar panels produced in China
- Aluminium associated with electrical parts and electronic equipment produced in China

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

Following on from a Modern Slavery questionnaire of the top 50 suppliers by spend in FY23 in which 6 suppliers were identified as potentially high risk, a review was undertaken of four suppliers and the level of risk was down rated based on the review. Further investigation is required in FY25 for the remaining two suppliers to clarify the level of risk.



Due Diligence Case Study Solar PV System

As part of procurement of a solar PV system for our Newcastle Manufacturing Facility, due diligence of the preferred supplier was undertaken. The due diligence process included a review of all relevant publicly available information from for the supplier, including concerns on the mitigation of modern slavery risk raised by an Non Government Organisation (NGO).

The supplier was engaged and asked to respond the concerns by the NGO.

The due diligence found that the supplier had taken meaningful steps to respond to the NGO's concerns and significantly improved its processes for managing its supply chain and providing open and transparent

TRAINING

During FY24, 5007 Civmec employees, contractors and labour hire attended the General Induction which included principles of Modern Slavery incorporated into the discussion on the Code of Conduct.

A dedicated internal Modern Slavery training package has been developed for Procurement, Human Resources, Commercial and Project Managers. This package will be rolled out in FY25.

Access to Remedy

Civmec recognises the need to provide access to reporting of and remediation for potential Modern Slavery. Civmec Employees have several mechanisms through which potential Modern Slavery can be reported 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 provide a process for redress of the issue. The Whistleblowing Procedure includes an independently administered hotline, known as STOPline which allows for staff and third parties to report serious misconduct. The service provider is required to make quarterly reports to the Board of Directors Audit Committee.

In addition, the Group maintains the right of freedom of association for all employees, and thus Modern Slavery may also be addressed through Trade Unions.

During FY24 there were no potential or actual incidents of modern slavery reported through the available mechanisms

Assessing the Effectiveness of Actions Being Taken

Understanding and assessing the effectiveness of actions undertaken to combat Modern Slavery is component to managing the risks of Modern Slavery in a systematic manner. A key component to the assessment of effectiveness of actions is the internal audit program. Civmec maintains a permanent auditor role within the Quality section to ensure non-financial management systems are operating effectively. During FY24 14 sub-contractors and suppliers underwent Quality Audits which included Modern Slavery criteria. No significant issues regarding Modern Slavery resulted from these audits. Civmec continues to determine systems and processes for determining the effectiveness of its actions in addressing Modern Slavery.

Communication and Consultation

Civmec recognises the importance of internal and external communication as a means for minimising the risk of Modern Slavery within the workforce and the supply chain. Key internal stakeholders include the Board, the senior executive management, Project Managers, and the Commercial, Procurement and Human Resources Teams. The management of Modern Slavery risks requires all relevant stakeholders (both internal and external) to work together, and the process of communication and consultation will ensure all stakeholders are provided with timely, accurate and detailed information in relation to Modern Slavery, so that the Group operations and supply chains can be managed effectively and also minimises the risk of exposure to Modern Slavery.





Conclusion

The Group is committed to eradicating all forms of Modern Slavery across its operations and supply chains and is continuously improving strategies and actions to identify and mitigate Modern Slavery risks. This Modern Slavery statement reflects Civmec Group's actions to date, and the Group is pleased to publish it and provide an ongoing report on its progress publicly.

This statement for Civmec Group was approved by the Board of Civmec Limited as the parent entity on 20/12/2024.

Patrick Tallon

Chief Executive Officer and Director of Civmec Limited

December 2024



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