

1 Introduction

Minprovis recognise that freedom from slavery is a fundamental human right and operate in compliance with fundamental labour standards. practices are consistent with the UN Guiding Principles on Human Rights and Business, and Minprovis operates in compliance with all applicable laws prohibiting modern slavery. Minprovis policies and standards, which are based on International Labour Organisation conventions, prohibit any use of forced or child labour in Minprovis operations or supply chains. Additionally, Minprovis recognises and respects employees' right to freely associate, organise and collectively bargain, and complies with working hour requirements as established by local laws.

Minprovis is committed to respecting and supporting the dignity, well-being and human rights of our employees and those who we engage with through our supply chain.

We seek to utilise ethical suppliers and expect their support in the identification of modern slavery risks throughout our supply chain.

Modern slavery is a term used to describe serious exploitation and undermines freedom of individuals. The purpose of this Statement is to outline Minprovis commitment to mitigating risks of modern slavery within its supply chain, provide awareness of what is modern slavery and encourage stakeholders to be mindful of and report suspected acts of modern slavery.

The sections of the Statement that specifically address what we have done to meet the core mandatory criteria required by the Australian Modern Slavery Act (2018) are outlined below.

2 Reporting Entity

MINPROVISE INTERNATIONAL PTY LTD (ABN 65167931768) is the 'reporting entity' (as defined in the Act) covered by this Statement and the terms 'Minprovis', 'we', 'us' and 'our' refer to the company (as defined below).

3 Structure, Operations and Supply Chain

3.1 Minprovis Structure and Operations

Minprovis was established in 2004 with a core business of reducing the risk associated with operating and maintenance of crushing equipment. With this expertise we have been able to grow our knowledge and service offerings to become the company we are today.

Though it changes, Minprovis typically has a workforce of 600+ employees. Detailed information on Minprovis is available at www.minprovis.com.au

Minprovis operates primarily in Australia and does so in accordance with our applicable values, policies and operating procedures.

We have an excellent reputation amongst our clients for outstanding quality, performance and safety initiatives. We believe we are one of the most capable, professional and reliable contractors in the industry.

We have undergone substantial and sustained growth to emerge as one of Australia's leading multi-disciplinary Services, Maintenance and Specialty Equipment and Products provider and today offer innovative, integrated solutions to a diverse customer base throughout Australia and Overseas in the Mining, Construction Infrastructure and Oil and Gas Industries.

Minprovis operations primarily cover Australia, with offices and facilities in:

- Welshpool, Western Australia
- Karratha, Western Australia
- Port Hedland, Western Australia
- Brisbane, Queensland
- MacKay, Queensland

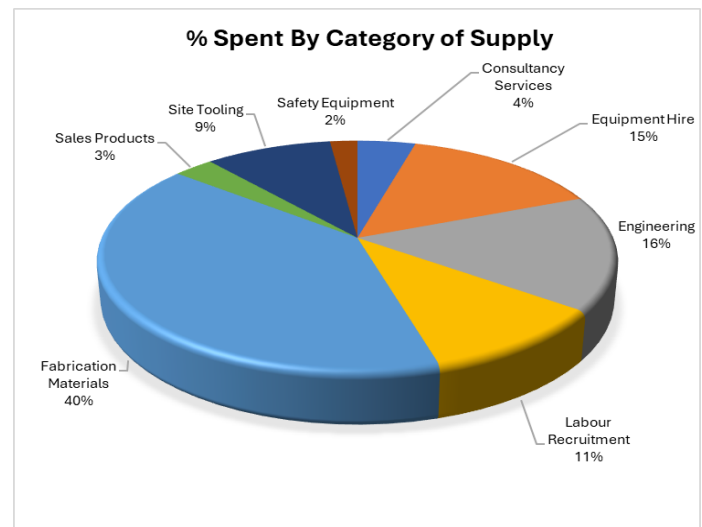
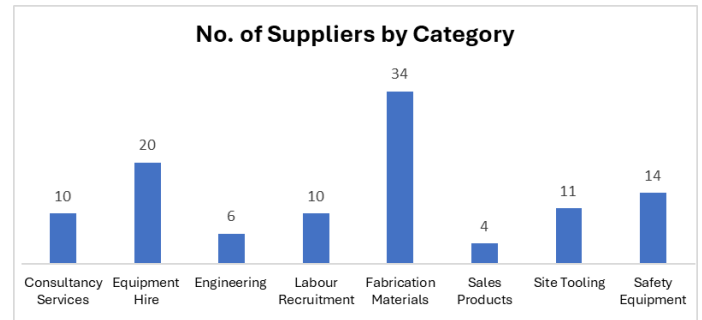
Our customers are typically large Mining multinationals operating in Australia.

The operations comprising Minprovis share common leadership, management, policies and procedures.

3.2 Supply Chain

In the 2023/2024 financial year, Minprovis supply chain consisted of almost 200 suppliers and a significant amount of its procurement spending was comprised by specialist labour hire services, engineering services, fabrication material and tooling, specialised equipment hire, sales products, among other services.

Depictions of our supply chain by number / percentage of suppliers to Minprovis by category of supply are presented below:



4 Identification or Risks of Modern Slavery Practises in our Operations and Supply Chain

4.1 Risk in our Operations

All of our employees and operations are located in the Commonwealth of Australia, and we comply with all Australian labour laws and other applicable employment related legislation and industrial instruments. Minprovis takes its employment compliance obligations seriously, has robust policies and processes in place and conducts periodic audits to ensure compliance with all applicable industrial instruments.

Our internal processes have found no evidence of any modern slavery practices or incidents in our operations, and we do not believe there is any material modern slavery risk in this area.

4.2 Risks in our Supply Chain

Minprovis continues to perform detailed due diligence on potential suppliers utilising the Vendor Pre-Qualification Questionnaire that has been revised to include a more detailed section in relation to Modern Slavery requirements. This helps to ensure that staff follow the Company processes to evaluate potential risks. As a result of these processes and the location of our suppliers, the overall risk level of Modern Slavery in our supply chains is low. The following still holds true for Minprovis:

- Minprovis does not have suppliers based in countries that present a high risk of Modern Slavery.
- In relation to potential high-risk categories of supply to Minprovis:
 - The majority of the categories of supply in Minprovis (by number of suppliers) are not in the top 5 high risk industries for imports into Australia (being, as presented by the Global Slavery Index 2023, electronics, garments, fish, rice and cocoa).
 - Whilst some specific scopes of supply to Minprovis may fall within the Global Slavery Index 2023s high risk category for Australian imported goods (namely PPE and other garments, phone, computers, and accessories), no Minprovis suppliers of these items are based in high risk jurisdictions.

- In any event, all suppliers to Minprovis are subject to the mitigations and controls outlined in Section 5 of this Statement.

5 Actions Taken to Assess and Address Modern Slavery Risks

5.1 Assessment of Risks

We have implemented and embedded an ongoing program to continuously improve our visibility into the labour practices in our supply chain and our ability to identify, assess and address risks of modern slavery practices in our operations and supply chain (the “Modern Slavery Risk Mitigation Program”).

The Modern Slavery Risk Mitigation Program is intended to be continuously reviewed and improved as time goes on and currently includes:

- A Modern Slavery Policy and Supplier Code of Conduct, linked to a Whistleblower Protection Policy. Our Modern Slavery Policy and Supplier Code of Conduct each specifically address our commitment to be vigilant on modern slavery issues, while the Whistleblower Policy strongly encourages employees and other stakeholders to report all violations of policies and ensures there will be no negative repercussions for doing so.
- Our Supplier Code of Conduct contains robust modern slavery contract warranties and covenants from suppliers. It includes recommendations that our suppliers “push” these same warranties and covenants up the supply chain by including them in their procurement contracts with their respective suppliers (our second-tier suppliers). A plan is in place to raise awareness of our Supplier Code of Conduct as part of the onboarding process for all new suppliers and new contract awards.
- Mapping of and assigning a risk rating to key first-tier suppliers in our supply chain based on perceived country level risk, business sector and industry risk, specific product and/or services risk and spend level.
- Targeted, customised “due diligence” of suppliers identified as being at highest risk for potential modern slavery incidents pursuant to point 3 above or otherwise. The due diligence surveys are designed to help validate and further assess the potential modern slavery risk of each supplier, by rating their modern slavery risk profile as High, Medium, or Low based on their responses to a series of questions relating to (i) their own operations and (ii) their supply chain. Due diligence responses are evaluated to determine whether and to what extent any additional follow up might be required, sensible and feasible in the circumstances, after which an action plan is meant to be created to implement such follow up in each relevant case.
- Onboarding of new suppliers and including them in the targeted, customised “due diligence.” Communication shared with customers when requested, referencing the latest Annual Statement with its explanation of the Modern Slavery Risk Mitigation Program to provide additional detail.

5.2 Addressing Risks

Some specific key actions taken in connection with the Modern Slavery Risk Mitigation Program in the reporting period include -

- We continued and further entrenched implementation of the Modern Slavery Risk Mitigation Program.
- Those suppliers who did not respond to our due diligence inquiries will continue to be actively pursued until they complete a survey.
- Previously, we added language supporting the modern slavery response in our new award contracts. We have now also updated our tender document to raise awareness at the start of the tendering process.

It is understood that we remain on a modern slavery risk identification and mitigation journey with our suppliers and expect to see our visibility into modern slavery risk in the supply chain improve and corresponding mitigation actions completed as we continue that journey. Our Modern Slavery Risk Mitigation Program has been designed – and will continue to be refined – with that in mind and with a view to “bring along” our supply chain with us on that journey to the greatest extent feasible.

5.3 How Effectiveness of Actions Taken is Assessed

To measure how effective our actions undertaken to address modern slavery practices in any part of our operations and supply chain we focus on the following areas:

- Operations notifications- reported issues in business operations;
- Supplier engagement- percentage of suppliers responding to survey requests;
- Supplier acceptance- percentage of suppliers accepting our Code of Conduct; and
- Level of high risk in supply chain- percentage of high risk suppliers in survey responses.

Over subsequent reporting periods, we will continue to review and enhance these assessments and develop further metrics to assess the effectiveness of our actions.

No incidents or practices that could be described as causing or contributing to Modern Slavery have been reported in any Minprovis operations for the FY 2024, and while we are aware of the risks of contributing to or being linked to Modern Slavery practices through our supply chain, we are not aware of any such incidences for the reporting period.

In the FY 2025 and beyond, Minprovis has continued and will continue to increase collaboration with internal and external stakeholders to address the issue of Modern Slavery.

Minprovis will strive to achieve this by raising awareness of Modern Slavery among employees and suppliers, continuing to evolve and improve our supplier due diligence, audit our processes and further improve our purchase terms and conditions.

6 Consultation Process

This Statement was reviewed by Minprovis Executive Commercial Manager with assistance from key Modern Slavery stakeholders within Minprovis.

Minprovis does not own or control any other entities and therefore this criteria is not applicable.

7 Other Relevant Information

Minprovis strongly supports fundamental human rights so the prevention of modern slavery and human trafficking and compliance with the spirit and intent – as well as the letter – of the Modern Slavery Act fully aligns with our standards and values as noted above. Our culture is underpinned by our commitment to meeting our clients’ needs without compromising human or natural resources. We are committed to providing and maintaining a safe work site for employees, subcontractors and others affected by our work.

Having said that, the reality is that ensuring that slavery and human trafficking is not taking place anywhere in our supply chain, and especially at tiers beyond our direct (first-tier) suppliers, will likely remain a significant ongoing challenge for the foreseeable future. However, we have implemented a risk-based approach and are committed to achieving continuous improvement through the actions described in this Statement.

This is our third Statement in response to the requirements of the Australian Modern Slavery Act. This Statement outlines the governance processes, activities conducted and progress we have made throughout our financial year to improve our understanding and management of the risks of modern slavery and human trafficking in our operations and supply chains.

This Statement was developed in consultation with our modern slavery stakeholders, and then reviewed and approved by the Sole Director - Graham Townsend in their role as principal governing body of Minprovis on 19 December 2024



Graham Townsend

Company Owner / Director

19/12/2024