

25<sup>th</sup> May 2022

# Modern Slavery Statement Year - 2021

**T.EN Australia and New Zealand Pty Ltd  
and Genesis Energies Consultants Pty  
Ltd**



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# Modern Slavery Statement

This Modern Slavery Statement for the calendar year 2021 is submitted by T.EN Australia and New Zealand Pty Ltd (T.EN AUNZ) and in consultation with its subsidiary Genesis Energies Consultants Pty Ltd.

T.EN AUNZ is a wholly owned subsidiary of Technip Energies NV a Netherlands Domiciled company listed on Paris Euro Next (T.EN (XPAR:TE.

This statement describes the steps and commitments T.EN AUNZ, has taken to address and ensure compliance to the “Commonwealth Modern Slavery Act 2018” and prevent/mitigate this from taking place within its own operations and supply chain.

T.EN AUNZ works under the global T.EN Human Rights Standard where we are committed to conduct our business in a manner that respects the rights and dignity of those working within, with or affected by our business’s.



## T.EN Human Rights Standard

- Implementation of grievance processes
- Maintaining a healthy, safe and secure environment
- Ethical recruitment and fair working conditions
- Prohibition of any form of child and forced labour
- Prohibition of all forms of discrimination and harassment
- Right to freedom of association and collective bargaining

# Our Business - T.EN

T.EN Australia and New Zealand Pty Ltd is an Australian incorporated private limited company, with its headquarters located in Perth Western Australia. It is the Australian business unit of Technip Energies group of companies (T.EN), a world-leading engineering and technology player.

With a proud 60-year history executing some of the world's largest and most complex engineering and construction (E&C) projects from early engagement to delivery. Our expertise includes a comprehensive portfolio of technologies, products, projects, design and project development services. This combined with our E&C capabilities and our technological know-how to develop new solutions, we will support the world's energy transition.

Our five foundational beliefs have been the cornerstone of our business for many years and will continue to be. They guide our behaviour's and we never compromise on, no matter the circumstances.

- Safety: We will not compromise on health, safety, and security.
- Quality: We deliver the highest quality in everything we do.
- Sustainability: We act responsibly, always considering our impact on the planet, people, and communities where we work and live.
- Integrity: We hold ourselves to the highest integrity principles.
- Respect: We treat everyone honestly, fairly, and courteously.

 **15,000**  
talented employees worldwide

 **34**  
operating countries

 **450**  
projects under execution

 **60+**  
years of operation

# Our Business - Genesis

Genesis Energies Consultants Pty Ltd is a wholly-owned Technip Energies company and operates independently, providing clients with impartial, effective, and value-driven engineering solutions..

Genesis is a market-leading consulting company focused on providing high-value advisory services for the energy industry. As trusted advisors committed to a sustainable future, we have extensive experience working in true partnership with our clients while providing innovative, robust and sustainable solutions.

By cultivating our extraordinary talent across our 14 global locations, we employ new and dynamic thinking by using digital tools, embracing change and constantly seeking new opportunities to make a real and lasting impact on the industry.

Wholly owned by Technip since 2001, TechnipFMC since 2017, and Technip Energies since 2021, the benefits to us are:

- Security and Safety in-Country
- Mutual benefits of shared knowledge and technologies,
- Financial strength in and parent company guarantees,
- world class execution, installation and procurement expertise
- Access to local knowledge and companies,
- Contracting entities in a wide range of countries across the globe,
- Access to out-turn project metrics for benchmarking

## Statement Consultations

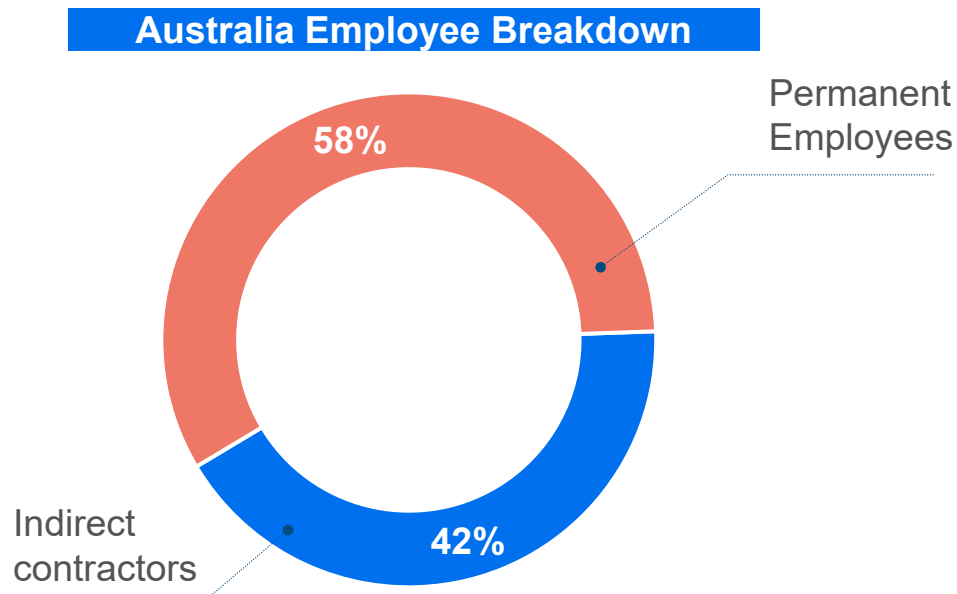
T.EN AUNZ and Genesis share the same leadership structure and in the development of this statement, to frame our expectations, raise awareness and understand the approach in mitigating modern slavery risks, Senior members of the Leadership team worked together to inform and contribute to the development of this statement.

# Employment

T.EN AUNZ employs both permanent and indirect contractors to perform its business services in Perth, Australia.

We form part of the Technip Energies global network of 15,000 talented employees worldwide.

Employees and contractors are engaged under individual common law contracts of employment in accordance with the Fair Work Act 2009 and National Employment Standards. Where awards are applicable to the job scope Technip Australia generally exceeds the conditions and wages set out within.



Breaking boundaries *together*  
to engineer a sustainable future

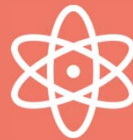
# Global Procedures and Policies

Our corporate Human Rights Standard sets forth Technip Energies principles related to human rights across the entire Technip Energies group to ensure that everyone we work with is entitled to honest, fair and courteous treatment. **We do not tolerate any form of modern slavery.**



## Global Standards

T.EN recognise their responsibility in respecting human rights in our operations and that everyone is entitled to honest, fair and courteous treatment. We do not tolerate any form of modern slavery. We express a strong commitment against the use of forced and child labour, and our support for respecting human rights.



## Building Responsibly

Technip Energies is a proud member of [Building Responsibly](#) - an industry-led collaborative initiative, enabling construction and engineering companies to collaborate around their shared values, advance their compliance programs and agree on common approaches regarding worker welfare and human rights.



## UN Guiding Principles

Our business conduct is informed by the United Nations Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. T.EN is also signatory of the [Global Compact Initiative](#) launched by the United Nations since April 2021.



## Code of Conduct

Our [Code of Conduct](#), sets out the foundational beliefs held by T.EN covering our commitments to the required laws, human rights principles and commitments. We have a zero tolerance for corruption, we believe in fair competition, we reject any form of human slavery, we protect personal data and human rights, we encourage our employees to speak-up.



# Our Supply Chain

T.EN AUNZ is part of a global supply chain which sources goods and services to support its onshore, offshore and technology operations.

Of T.EN AUNZ's Direct spend in 2020, 59% was spent within Australia with the remaining spread over Europe, UK, the Americas and SE Asia.

Our Supply Chain covers goods and services to support our operations including pressure vessels, boilers, piping, tooling, electronic equipment, electrolysers, cleaning, catering and personal protective equipment.

T.EN AUNZ's supply chain also includes services provided by contractors, including, fabrication, offshore support, third party recruitment and inspection services

We aim to develop and strengthen relationships with suppliers who are committed to those principles enshrined in the pertinent international and regional conventions on human rights and to the principles set out in the UN Guiding Principles on Business and Human Rights and in the core International Labor Organization (UN) Conventions.

TEN AUNZ's professional activities are governed by a purpose, values and ESG pledge and T.EN is signatory of the Global Compact Initiative launched by the United Nations.

Said T.EN purpose, values and ESG pledge are described on T.EN website at <https://www.technipenergies.com/sustainability>

T.EN AUNZ's Suppliers have their own supply chain and we recognise that each level in the supply chain is responsible for ensuring compliance with all applicable laws and regulations and for respecting human rights.



# Supply Chain Risks

Although the risk of modern slavery within our direct workforce is perceived as **low**, it is recognised that as T.EN AUNZ source goods and services globally, this risk can increase and that certain areas of our supply chain may pose a higher labour rights/modern slavery risk due to their location and the nature of the goods and services procured.

Risk assessments are one of the tools we use to implement or improve risk-based controls once we identify any areas for improvement, and we review our approach to improving our Labour rights risk assessment in our supply chains on a continuous basis.

T.EN AUNZ follows a risk-based approach to assess where its operations face the highest risks from a human rights perspective. We prioritize risks and address these through appropriate mitigation measures.

Please see below examples of mitigations which may be implemented on selected projects depending on the risk assessment performed.

| COUNTRIES SOURCED | EXAMPLE OF GOODS/ SERVICES SOURCED  | MITIGATIONS  |
|-------------------|---|--|
| CHINA             | <ul style="list-style-type: none"> <li>Electronics,</li> <li>Instrumentation</li> </ul>   | <ul style="list-style-type: none"> <li>Supplier Prequalification's Audit</li> <li>Due diligence assessment (in process)</li> </ul>                           |
| MALAYSIA          | <ul style="list-style-type: none"> <li>PPE,</li> <li>Raw material</li> <li>Fabrication</li> <li>Manufacturing</li> <li>Engineering and maintenance</li> </ul> | <ul style="list-style-type: none"> <li>Financial credit checks</li> <li>Realistic delivery targets</li> <li>Human Rights evaluation questionnaire</li> </ul> |
| INDIA             | <ul style="list-style-type: none"> <li>Labour hire</li> </ul>   | <ul style="list-style-type: none"> <li>Inclusion of "Human Rights Standard" Contractual Clauses</li> </ul>   |

**Improvement Opportunity** - We are working on developing our due diligence processes and performance assessment of our suppliers' human rights practices.

# Supply Chain Governance

We have globally developed and implemented controls, policies and procedures to manage the risk of modern slavery in our supply chain.

In order to contract with T.EN AUNZ, our suppliers are required to review, complete and comply with;

- T.EN Code of Business Conduct
- T.EN General Business Principles and Supplier Principles.
- Global Purchasing Terms and Conditions
- Prequalification's for Quality and Health and Safety to ensure that adequate policies and procedures are in place for management of staff safety and product quality.
- Due Diligence review (for identified high risk work scopes)
- Relevant trade regulations and requirements under applicable laws.
- Suppliers may be subject to on-site audits, which could be announced or unannounced, and which may be performed by either T.EN personnel or third-party auditors.

## Improvement Opportunity

- Inclusion of a Human Rights Questionnaire and Evaluation as part of the prequalification process for identified high-risk subcontractors and suppliers.



# Impact of Covid 19

The impact of Covid 19 on supply chains has been felt globally. Economic and social impacts have significantly increased the risk of exposure to modern slavery practices in organizations.

T.EN AUNZ identifies that the key risk areas attributed to these pressures are, reduced workplace & labour standards due to lack of health and safety resources, unrealistic delivery targets, logistical expense, logistics delays & lack of raw materials. From the onset of Covid19, T.EN AUNZ has been reactive in implementing a range of health & safety measures that comply with local and federal government recommendations and health advice.

In addition to T.EN AUNZ's own Covid Management Plan, contractors and service providers are required to have their own management plan in place that complies with the Western Australia Department of Health and the World Health organization directives.

T.EN AUNZ engaged with all key stakeholders to understand how Covid 19 had affected their respective supply chains & where adjustments could be made to assist & mitigate this impact. Some of the initiatives in place included;

- Remote Inspections
- Ensuring communication channels remained open.
- Not unfairly penalizing due to Covid related delays.

T.EN AUNZ Acknowledges that the uncertainty of the pandemic situation also affected the ability to adequately perform supplier audit and inspections. We continually look to work with stakeholders to ensure communication lines, specifically around Covid management plans and the impacts on their workforce are always open and transparent.

**Improvement Opportunity** - T.EN AUNZ will work towards updating the local human rights risk assessment tools to include pandemic management.

# Effectiveness and Management Controls

We encourage our people and partners to raise questions and concerns to ensure that we are leading by example.

## What do we do to ensure performance effectiveness?

- Suppliers must adhere to our human rights clauses under Article 7.8 of our Standard Terms and Conditions for Supply.
- Sourcing teams conduct post-award contract management evaluations on high risk orders. As part of this assessment we are working towards including assessing the impact & the compliance to the T.EN human rights standard.

## Actions to control untoward findings;

- T.EN is working toward the development of processes/procedures that address human rights breaches by a supplier/sub contractor.
- Under article 7.9 of our Standard Terms and Conditions of Supply SUPPLIER is to notify T.EN immediately of any alleged or identified breaches and cooperate with T.EN to address the areas of concern.
- T.EN will work with SUPPLIERS to look for improvement opportunities surrounding Human Rights breaches or non compliances.
- Where improvements are unable to be made within a reasonable time frame we would reserve the right to withhold payment until rectifications have been made or terminate any ongoing agreement in accordance with the relevant agreed terms and conditions of the order.
- Extreme measures would result in the prevention of supplier from securing future work with T.EN until such a time where the improvements are adequately demonstrated to be implemented.

Breaches are to be reported through T.EN's dedicated Ethics Helpline (online or via telephone)

<http://technipenergies.ethicspoint.com>

OR

**1800 765 613**

.....

In Australia a person reporting a breach is protected by the "Australian Whistleblower Legislation" of which T.EN supports & complies with.

# Continual Improvement and Our Commitments

It is T.EN AUNZ’s commitment to ensure that all processes and procedures are continually reviewed and amended in order to prevent any contribution to Modern Slavery by T.EN Australia and New Zealand Pty Ltd and Genesis Energies Consultants Pty Ltd in its supply chain.

We commit that this statement will be reviewed and revised on an annual basis to address the challenges faced in relation Modern Slavery Practices.



# Statement Approval

This statement has been approved by the Responsible Member and Principle Governing Body of T.EN Australia and New Zealand Pty Ltd and Genesis Energies Consultants on the 26<sup>th</sup> May 2022.



**Paul Browne**

*Country Manager – Australia*

## Commitments

**WE SUPPORT**



Signatory of the UNGC: commitment to the Ten Principles



Commitment to the UN SDGs: Taking actions and contributing to the global goals



Member of Building Responsibly: collaboration for workers' rights and welfare

