Monadelphous

TOGETHER WE GROW

Modern Slavery Statement 2024

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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) 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 statement outlines the Company's governance, processes and activities undertaken during the year ended 30 June 2024. References in this report to 'year' or 'period' refer to the financial year ended 30 June 2024, unless otherwise stated.

Overview

Modern slavery remains a global issue, affecting approximately 50 million victims around the world (2023 Global Slavery Index (GSI)). 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 exposure to modern slavery risks remains within its supply chain. The Company takes a risk-based approach to managing these risks. Throughout the year, the Company continued to evaluate and enhance its modern slavery framework, associated processes and tools, and integrated recent acquisitions, BMC and Melchor, into the framework. The Company updated its supplier self-assessment questionnaire process, which greatly improved the Company's transparency of modern slavery risks within its supply chain and the actions taken by its suppliers to address these risks. In addition, the Company's standard supplier terms and conditions were refined to strengthen the requirement for supplier compliance with the Monadelphous Supplier Code of Conduct and emphasised the prohibition of modern slavery practices.

The Company continued to engage with its direct supply chain, raising awareness of modern slavery risks and conducting onsite supplier capability reviews. Modern slavery awareness training continued to be provided to all employees, with more detailed training provided to those employees operating in high-risk geographies and those regularly interacting with suppliers and subcontractors.

Monadelphous recognises that continual improvement is key to reducing the risk of modern slavery. The Company continues to refine its roadmap of actions to ensure ongoing improvement in identifying, assessing and addressing the risks of modern slavery, and has maintained progress in alignment with planned activities.

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 China, Papua New Guinea, Mongolia and the Philippines.

The Company operates from major offices in Perth and Brisbane, with regional offices in Newcastle, Beijing (China), Ulaanbaatar (Mongolia) and Manila (Philippines), and a network of workshop facilities in Bibra Lake, Bunbury, Capel, Kalgoorlie, Newman, Osborne Park, Tom Price, Karratha, Port Hedland, Darwin, Roxby Downs, Mackay, Gladstone, Chinchilla, Muswellbrook, Mt Thorley, Rutherford and Morwell.

At 30 June 2024, Monadelphous directly employed 6,481 employees and had a total workforce, including subcontractors, of 7,423.

For further information regarding the Company's workforce profile and gender diversity, refer to the Monadelphous website at www.monadelphous.com.au/sustainability/diversity and its most recent Workplace Gender Equality Agency report.

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 2024.

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 2024, the Company maintained a supplier database of over 3,600 suppliers, with the majority (around 90 per cent) of its annual supplier spend of approximately $700 million occurring with suppliers and subcontractors located in Australia. Other countries with significant spend included China, Mongolia, Vietnam, Papua New Guinea, Italy and the Philippines.

The Company sources a diverse range of goods and services. The top categories of supply by spend for the year ended 30 June 2024 were:

- Construction materials and consumables
- Professional engineering services
- Equipment purchase and hire
- Workforce labour hire
- Transportation and freight
- Travel

The following table outlines Monadelphous' spend statistics for the primary overseas countries from which Monadelphous sourced goods and services for the year ended 30 June 2024.

Supplier Country	% of Overall Spend	Number of Suppliers	Categories of Supply

China	4.6% ($31.9 million)	149	• Construction materials and consumables:
			  ○ Steel
			  ○ Piping
			• Equipment purchase and hire
			• Welding services
			• Workforce labour hire

Mongolia	2.6% ($18.4 million)	137	• Workforce labour hire • Construction services • Construction materials and consumables
Vietnam	1.0% ($7.2 million)	8	• Construction services • Construction materials and consumables
Papua New Guinea	0.9% ($6.2 million)	61	• Workforce labour hire • Travel and accommodation services
Italy	0.7% ($4.8 million)	2	• Equipment purchase and hire
Philippines	0.6% ($4 million)	5	• Outsourced services

The Company prefers to undertake business with prequalified suppliers operating under negotiated subcontracts and procurement terms and conditions. During the period, approximately 90 per cent of its supplier spend was under negotiated subcontract agreements and Company procurement terms and conditions.

Identifying risks of modern slavery

Monadelphous adopts the concepts set out in the United Nations Guiding Principles when identifying the modern slavery risks in its operations and supply chain and considers ways in which its activities may *Cause*, *Contribute* or be *Directly Linked* to instances of modern slavery. The Company's interpretation of these concepts and examples are included below.

Cause	Contribute	Directly Linked
The risk of the Company causing a human rights impact through its direct actions.	The risk that the Company's actions may contribute to another party causing a human rights impact, including actions or omissions that may facilitate or incentivise modern slavery.	The risk of the Company being linked to a human rights impact it has not caused or contributed to, as a result of a business relationship.

Operations

Monadelphous has undertaken a detailed risk assessment and determined there is a low risk of the Company causing instances of modern slavery within its direct 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. Monadelphous employment contracts meet or exceed the applicable employment legislation in the countries in which the Company operates.

The Company acknowledges that some parts of its operations utilise labour through third party providers and subcontractors, and it may or may not have direct supervision over these third party workforces or transparency of their terms and conditions of employment. The Company has assessed the risk of modern slavery occurring to be greater for labour suppliers that operate in geographies and industries with a higher prevalence of, and vulnerability to, modern slavery.

The following areas of the business have been identified as those which have a greater potential for the Company to Contribute, or be Directly Linked, to modern slavery practices due to its 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
Papua New Guinea *(Monadelphous PNG Ltd)* GSI Vulnerability Score 2023: 79	Provider of construction and maintenance services in the Papua New Guinea minerals and energy industries utilising local subcontractor service providers.
China *(Inteforge Pty Ltd, Moway AustAsia Steel Structures Trading (Beijing) Company Limited, Inteforge Engineering & Fabrication (Tianjin) Co. Ltd)* GSI Vulnerability Score 2023: 46	Provider of fabrication management services, operating with a range of preferred manufacturing subcontractors located in China.
Mongolia *(Monadelphous Mongolia LLC)* GSI Vulnerability Score 2023: 50	Provider of construction services in the Mongolian resources industry utilising local Mongolian subcontractor labour.
Philippines (outsourced services) GSI Vulnerability Score 2023: 66	Outsourced professional services provided to Monadelphous through partnerships with Filipino outsourcing labour providers located in Manila.

Supply chain

Monadelphous applies risk assessment criteria to identify suppliers with a high risk of modern slavery, including industry, geography and spend. Suppliers operating within specific industries with known labour risks and those recruiting vulnerable populations are considered to have elevated risks of modern slavery.

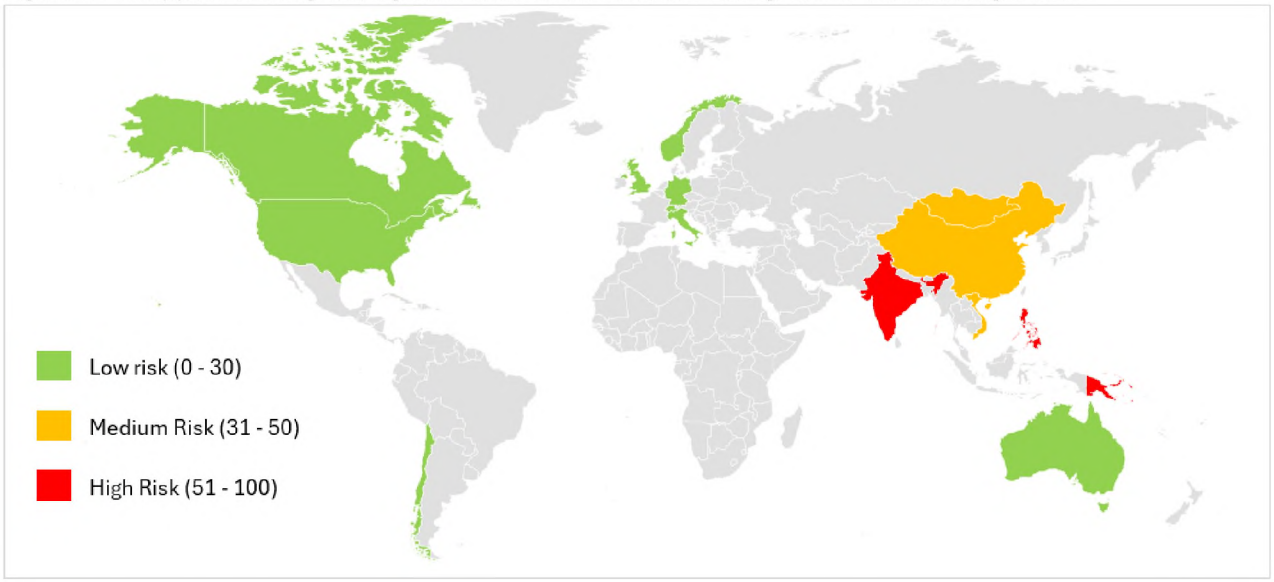
High-risk industries identified within the Monadelphous supply chain include:

Manufacturing	Manufacturing often occurs in geographic locations with high prevalence of labour rights abuses including, but not limited to, forced labour, child labour, unsafe working conditions and excessive overtime. Manufacturing workers may also have limited resources or methods for raising and resolving grievances. Further, there is a risk that products may be manufactured using raw materials produced by workers subjected to modern slavery. The Company may be Directly Linked to human rights impacts through the actions or omissions of its suppliers and/or their suppliers. The Company may also Contribute to human rights impacts if its procurement practices apply excessive pressure on suppliers, such as aggressive cost reductions or shortened delivery times.
Construction	The construction industry, specifically in geographic locations with high prevalence of modern slavery, commonly utilises migrant, unskilled and low paid workforces. These workforces have an increased exposure to labour rights abuses including, but not limited to, forced labour, child labour, unsafe working conditions, human trafficking and excessive overtime. The Company may be Directly Linked to human rights impacts through the actions or omissions of its construction subcontractors and/or their suppliers. The Company may also Contribute to human rights impacts, such as excessive overtime, if its contracting practices apply excessive pressure on subcontractors, such as significantly shortened construction schedules.
Recruitment Agencies and Labour Hire	Recruitment and labour hire industries, particularly those recruiting migrant and base skilled workers have a higher risk of modern slavery abuses including, but not limited to, human trafficking, forced labour, debt bondage and deceptive recruitment. As a result of ongoing labour shortages in the Australian resources industry, the Company has increased the use of recruitment agencies and labour hire providers to source its workforce. The Company may be Directly Linked to human rights impacts through the actions or omissions of its labour hire suppliers and/or their suppliers.
International Shipping and Marine Transport	The Company utilises marine transportation for the majority of items procured and manufactured overseas. The Company is aware of elevated risks of modern slavery within the international shipping industry, including but not limited to, forced labour, withholding of pay and below minimum living wages, poor working and living conditions and lack of access to appropriate grievance processes. The Company may be Directly Linked to human rights impacts through the actions or omissions of its shipping suppliers and/or their suppliers.

In addition to high-risk industry, suppliers are identified to have a higher risk of modern slavery where operating in geographies with high vulnerability to modern slavery by reference to the Global Slavery Index. Monadelphous utilises suppliers located in China, Mongolia, Vietnam, Papua New Guinea and the Philippines, countries recognised by the Global Slavery Index as having a higher vulnerability to the risk of modern slavery.

The country map below represents the risk of modern slavery for each of the geographies from which the Company sourced goods or services (of a value greater than $100,000) during the year.

Figure 1 – Supplier country risk by reference to the Global Slavery Index Vulnerability Score



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. 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.

Stakeholder consultation and collaboration

During the development of its modern slavery framework, corporate and operational stakeholders across the Company's Australian and overseas operations were consulted through workshops and interviews to ensure pertinent risks were identified and appropriately considered. Additionally, a third party provider with expertise in supply chain risk was engaged and a range of modern slavery organisations were consulted in the development of the framework.

The framework is reviewed on an annual basis in consultation with stakeholders across the business, including representatives from the Company's procurement, legal, contracts, human resources, risk, equipment management and health and safety teams. Examples of the consultation and collaboration with various stakeholders in relation to the Company's modern slavery processes during the period included:

- Extensive interactions with teams from recently acquired businesses, BMC and Melchor, for the integration into the Company's modern slavery framework;
- Consultation with the Company's recruitment and human resources teams in undertaking reviews of internal recruitment practices and labour conditions of the Company's overseas high-risk operations in Mongolia and Papua New Guinea;
- Facilitating face to face modern slavery awareness training in collaboration with health and safety, training and development and site leadership teams (refer to Training and awareness section);
- Contractual and legal teams revising, communicating and implementing updated supplier terms and conditions templates (refer to Supplier contractual terms and conditions section); and
- Overseas procurement teams conducting onsite assessments of high risk suppliers in consultation with the Group Risk and Assurance function (refer to Supplier due diligence section).

The Company continues to engage the same third party provider for regular supplier due diligence and general risk screenings. Further, Monadelphous continues to maintain its connection with human rights advocacy groups, periodically validating its approach and analysing data in the maintenance of its framework.

The Company's commitment and expectations in regard to mitigating modern slavery risk are communicated across the business to its owned and controlled entities through a number of channels as outlined in this statement, including the overarching modern slavery framework, which encompasses policies and procedures, as well as education and training.

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 chain
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, supported by the Group Risk and Assurance function, 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.

Monadelphous reviewed its suite of policies during the year as part of its annual policy review. The Code of Conduct was enhanced to broaden the Company's commitment to equality in employment, reinforcing the provision of a safe, inclusive and respectful workplace where people of all backgrounds, skills and cultures can work together collaboratively, and reach their full potential.

The polices described below confirm the Company's commitment to addressing modern slavery risks within its operations and supply chain. They are conveyed to Company employees through inductions, training programs and leadership communications and are enforceable in accordance with the Company's Code of Conduct and employment agreements. Copies of these policies are available on the Monadelphous website at www.monadelphous.com.au.

Policy / Procedure	Purpose
Code of Conduct	Provides guidance on the expected behaviour of all Monadelphous employees.
Acceptable Workplace Behaviour Policy	Outlines Monadelphous' commitment to ensuring the working environment is free from all forms of unacceptable behaviour, including bullying, harassment, sexual harassment, intimidation, abuse or any acts or threats of violence or assault.
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 achieving sustainable growth by ensuring the safety, wellbeing and development of its people, the delivery of outstanding service to its customers, caring for the environment and communities in which it works and providing superior returns to shareholders.
Integrity and Whistleblower Policies	Provides reporting frameworks through which Monadelphous employees, contractors, suppliers and members of the public are able can report instances of actual or suspected unethical or unlawful conduct, without fear of retribution, victimisation or reprisal.
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 remains guided by the following labour engagement principles:

- Not utilising migrant or seasonal labour;
- Not requiring employees to reimburse recruitment fees or imposing fines;
- Not retaining original employee identification documents or preventing employees from moving freely;
- Not using child labour;
- Not undertaking deceptive recruiting practices; and
- Ensuring employee remuneration, terms and conditions meet or exceed the legal requirements of the geographies in which the Company operates.

Training and awareness

The Company remains committed to continually improving awareness of modern slavery as a critical aspect in identifying and addressing risks.

The Company's Code of Conduct and Acceptable Workplace Behaviour training includes modern slavery and labour rights awareness content and is required to be completed by all Company employees (including the Board and executive management) during onboarding, and on an annual basis during employment tenure. In addition, Company leaders (including executive leadership and general management) and employees operating in high-risk locations, as well as those frequently interacting with suppliers and subcontractors, complete more detailed modern slavery awareness training. This training assists those employees in identifying potential signs of modern slavery during supplier interactions and reiterates how to report suspected or actual concerns.

During the year, the Company updated its detailed modern slavery awareness training and improved its accessibility by delivering the training to overseas national employees in their native languages via face to face training sessions held in Mongolia and Papua New Guinea.

Customer engagement

Monadelphous works with customers who share its values in respecting the human rights of every person involved in its operations, supply chain and the communities in which it operates.

Customer collaboration continues to provide the Company with valuable insights into current industry labour and human rights practices and effective approaches to investigating, controlling and responding to modern slavery risks. The Company applies these insights to enhance its own policies and procedures.

Monadelphous participates in the disclosure of its own modern slavery practices to customers to assist them in meeting their modern slavery commitments and reporting requirements. During the period, more than 30 customer modern slavery surveys were completed.

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 supply chain.

The Company ensures the accessibility of its Integrity Hotline and reporting framework for international employees and external parties. Alternative language options are available on the Integrity Hotline website, and toll-free and local telephone numbers are provided to remove the potential impediment of international call costs.

Supplier contractual terms and conditions

Monadelphous' suite of procurement and subcontract terms and conditions templates include a contractually binding requirement for the supplier to comply with all applicable labour rights laws, practices and 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.

During the year, the Company refined its subcontract templates reinforcing its modern slavery requirements, Supplier Code of Conduct compliance expectations and emphasising prohibited practices. The Company continues to work with its direct suppliers to improve understanding and compliance with these modern clauses, and during the year only a small number of suppliers requested amendments to the clauses. Where changes were requested, the Company clarified its expectations and assessed the applicability of requirements with the supplier, negotiating an outcome commensurate with the supplier's modern slavery risk profile.

Procurement terms and conditions are available on the Company's website at www.monadelphous.com.au.

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.

To date, the Company has not identified any actual modern slavery occurrences within its direct supply chain. However, the Company has elected not to engage with several prospective suppliers due to modern slavery related concerns that were identified during pre-engagement due diligence screening.

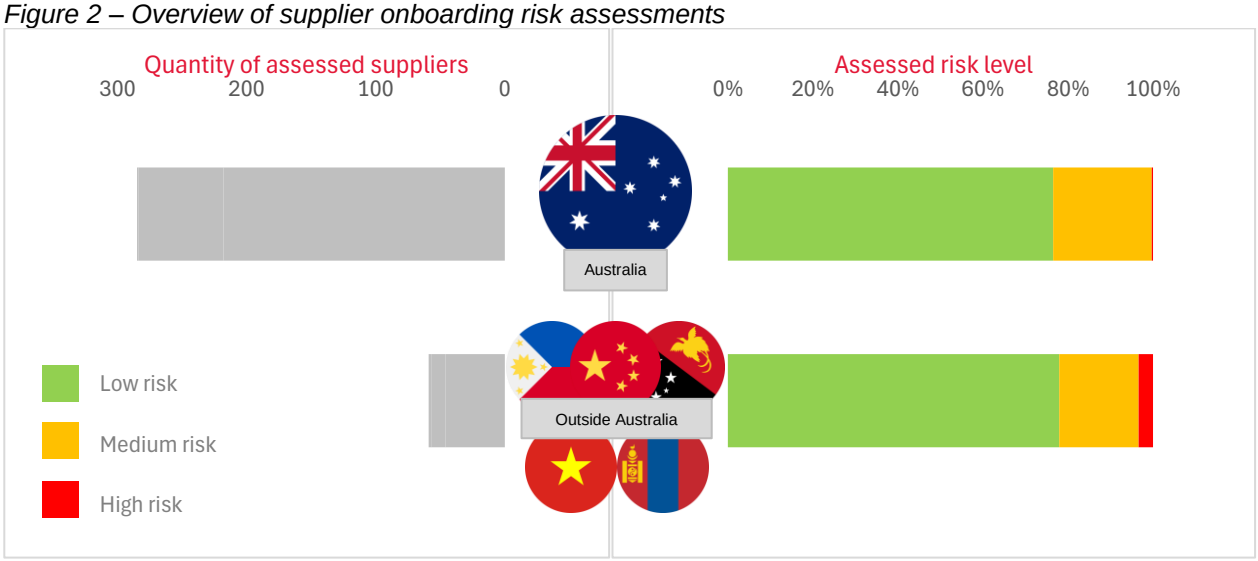
The Company acknowledges the potential for modern slavery risks within its indirect supply chains. During the year, the Company continued to work with its direct suppliers to improve visibility of modern slavery risks within their supply chain (the Company's lower tier supply chain) and how these risks are being assessed and addressed.

Supplier self-assessment questionnaire (SAQ) and due diligence screening

Monadelphous applies its modern slavery risk assessment criteria, which is based on industry category and geography, to its supplier database to identify high risk suppliers for detailed supplier due diligence screening. For suppliers identified as high and medium risk, further due diligence may be undertaken by a third party provider specialising in supply chain risk, involving 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.

To improve the transparency of supplier modern slavery practices, Monadelphous requires all suppliers to complete a modern slavery self-assessment questionnaire (SAQ) during onboarding and periodically during their engagement. During the year, the Company reviewed approximately 350 SAQs completed by suppliers and assessed the risk based on the supplier's geography, industry and disclosed modern slavery controls. Refer to *Figure 2* for an overview of supplier risk assessments undertaken during the period.

Figure 2 – Overview of supplier onboarding risk assessments

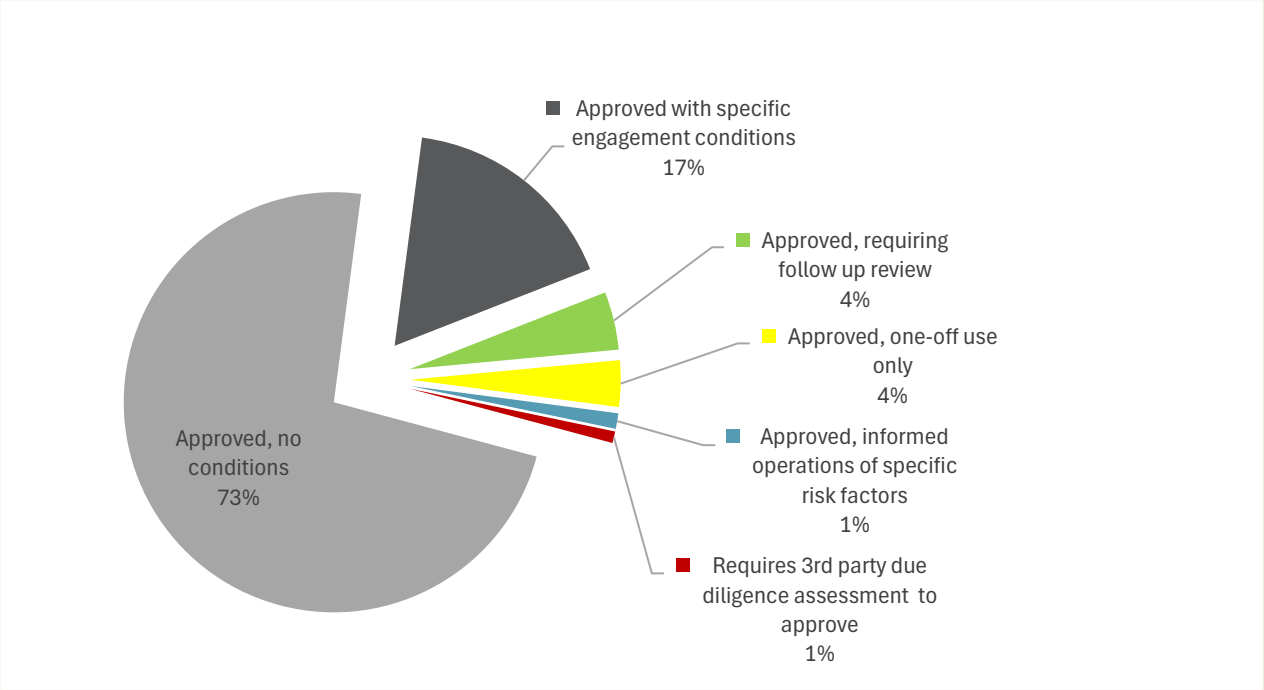


In the previous period, the Company updated its SAQ to request suppliers disclose the extent of their supply chain visibility, including their top direct supplier products and services, supplier manufacturing locations and the modern slavery assessments they have conducted of their suppliers. This information provides greater transparency of the Company's lower tier supply chain, enabling the identification of high risk areas for further supplier engagement and investigation. As anticipated, despite the Company primarily trading with Australian suppliers, the data indicates that a large portion of the goods provided to the Company by its second and third tier suppliers are sourced from and manufactured in overseas locations. Refer to Appendix C for a graphical representation of the countries of operation and manufacturing of the Company's Tier 1, 2 and 3 supply chain.

Supplier SAQ responses continue to indicate varying degrees of supplier modern slavery awareness, appreciation and maturity of controls. Australian supplier responses continue to indicate greater awareness and transparency of modern slavery related risks, whereas suppliers located in developing countries typically disclose less mature approaches.

Where concerns are identified during the SAQ review process, further supplier engagement and treatment strategies are employed as required. The Company may also implement specific risk mitigating engagement conditions when engaging suppliers with elevated risk profiles. Refer to *Figure 3* for an overview of supplier assessment outcomes and engagement conditions.

Figure 3 – Overview of supplier assessment outcomes and engagement conditions



Onsite supplier assessments

When identifying and onboarding new high spend suppliers and/or suppliers providing critical services, the Company undertakes supplier capability assessments which may include onsite visits to supplier facilities. During the year, onsite capability assessments were completed for suppliers operating in geographies and industries with a high vulnerability to modern slavery. This included manufacturing, fabrication and logistics companies operating in China and Mongolia. Supplier factories, workshops and worker accommodation quarters were visited to identify any signs of labour rights abuses or unacceptable working conditions. No concerns were observed during the onsite supplier assessments completed during the year.

Periodic supplier assessment

Acknowledging that a supplier's risk profile may change over time, the Company also undertakes periodic assessments of existing suppliers which trigger risk and spend thresholds. These assessments typically involve a review of the supplier's publicly available information, direct supplier engagement seeking updated SAQ responses and dialogue regarding key modern slavery risks and controls.

Treatment strategies

Monadelphous applies treatment strategies to address concerns identified during supplier onboarding assessments, periodic supplier assessments and other due diligence activities. During the period, approximately 20 per cent of suppliers assessed were subject to the application of treatment strategies due to aspects associated with the SAQ response or the Company's identification of potentially concerning publicly available information. Engagement with suppliers during the period was largely to clarify the Company's concerns, validate supplier understanding of modern slavery risks, and in many instances to improve awareness and suggest the application of further modern slavery preventative controls and practices.

Monadelphous applies the following treatment strategies to address any modern slavery concerns identified during the assessment process:

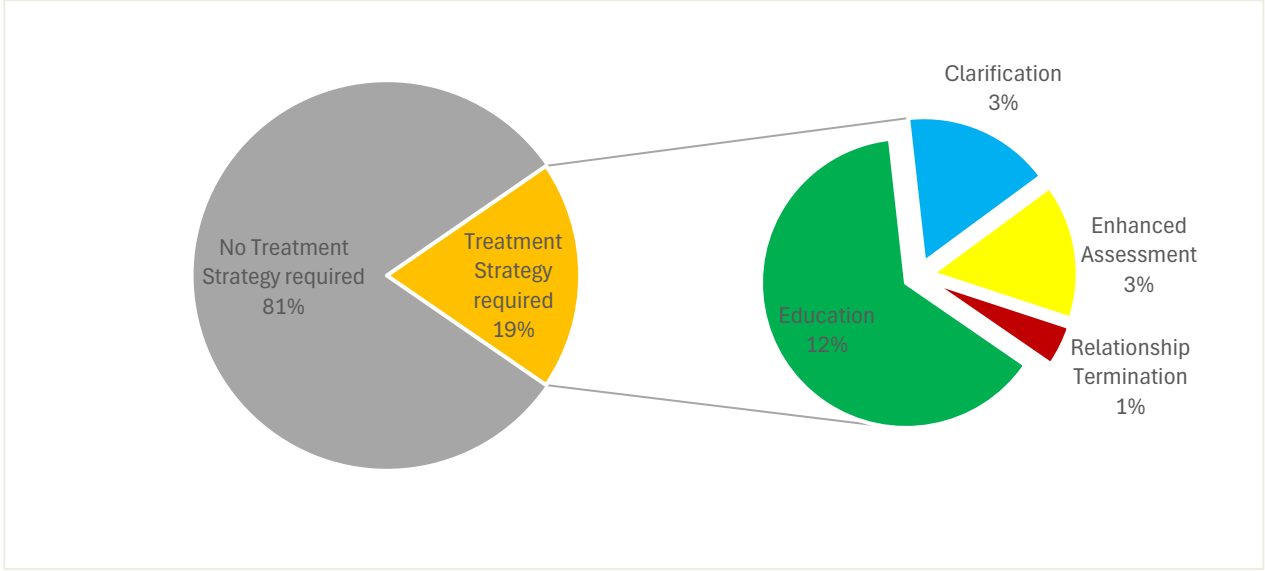
Clarification – *where additional visibility or context is required.*
Throughout the period, suppliers were routinely contacted to seek clarity and confirmation in relation to their SAQ responses.

Education – *raising supplier understanding and awareness of modern slavery risks*.
Engagement with suppliers regarding the SAQ or Supplier Code of Conduct continued to include elements of education regarding modern slavery risks, mitigation strategies, as well as discussion regarding Monadelphous' modern slavery contractual terms and conditions.

Enhanced assessment – *additional supplier assessment activities such as onsite focused audits of labour rights and hiring practices*.
No enhanced assessments were undertaken during the period, however several onsite supplier assessments were completed as noted above in the Onsite supplier assessments section.

Relationship termination – *where zero-tolerance concerns are identified, or supplier does not satisfactorily participate in treatment strategies*.
During the period, most treatment strategies were effective in addressing the Company's concerns, however there were a small number of occurrences where suppliers did not provide satisfactory responses and as a result, the Company elected not to engage with these suppliers.

Figure 4 – Overview of treatment strategies applied during supplier due diligence activities



Remediation

Monadelphous has in place a reporting framework, through which employees, contractors, suppliers, subcontractors and members of the public can 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 it may have contributed to or caused, to the extent practicable, and to the principle of fairness in all investigations. Parties reporting concerns or participating in investigations will not be subjected to unfavourable treatment and will be provided support appropriate to the circumstances of the concern.

Within its international operations, the Company employs translators to support non-English speakers in raising concerns and seeking support. In addition, the Company trains its Health, Safety and Human Resources teams in Mental Health First Aid to complement its existing response strategies and to provide immediate care for potential victims of human rights abuses.

The Company continues to communicate its reporting framework to employees and stakeholders through its policies, Supplier Code of Conduct, employee training programs and targeted communication campaigns.

During the year, no human rights or modern slavery concerns were identified within Monadelphous' operations or supply chain.

Measuring effectiveness

The Company remains focused on the application and refinement of its modern slavery framework and associated processes and continues to consult with internal stakeholders to evaluate and improve its effectiveness.

The Company also regularly evaluates the suitability of its approach by benchmarking its framework against guidance provided by environmental, social, governance (ESG) and human rights advocacy groups, its customers and the investment community.

The effectiveness of the Company's actions in addressing modern slavery risks is assessed through various methods, including but not limited to:

- Independent reviews of its modern slavery framework and associated procedures;
- Assessing changes in the risk profile of its operations and supply chain;
- Increased employee awareness and appreciation of modern slavery risks;
- Consultation with internal stakeholders;
- Feedback from external parties;
- Collaboration with other organisations and human rights advocacy groups;
- Benchmarking performance against external stakeholder expectations; and
- Achievement of its modern slavery related objectives.

Some examples of these activities undertaken during the period include:

Objective	Activities and Findings
Employee training and awareness	Following successful modern slavery training campaigns in previous periods, the Company continues to observe an overall increase in employee awareness and consideration of modern slavery risks in day-to-day operations. Modern slavery risks continue to be discussed and considered in a range of business activities including labour sourcing strategies, supplier selection, net zero procurement initiatives and acquisition and joint venture partner assessments.
Collaboration and benchmarking	The Company's modern slavery statements continue to be subject to review by investor ESG advisory bodies. Where practical, the Company seeks specific feedback and guidance from these bodies to validate the alignment of its modern slavery framework and disclosures with external stakeholder expectations, enabling continuous process improvement and transparency.
Internal review of recruitment practices and labour conditions	During the period, the Company undertook further review of its internal recruitment practices and labour conditions within a number of high-risk overseas locations in which it operates. These reviews confirmed that the Company's framework remains effective in mitigating the modern slavery risks encountered. A number of minor improvement opportunities were identified to increase the accessibility of training material and reporting resources. Refer to Training and awareness section for further detail.

Continuous improvement

Monadelphous remains committed to the continuous improvement of its modern slavery prevention, detection and eradication practices. A range of additional actions have commenced, or are planned, and will be reported in subsequent statements. These include the below activities.

Period	Activities
FY25 and beyond	Monadelphous controlled operations: • Ongoing review and enhancement of modern slavery framework and associated policies and procedures Supply chain engagement activities: • Continued analysis and risk mapping of lower tier supply chain • Targeted responses to modern slavery supply chain risks associated with the Company's Net Zero initiatives • Continued application of treatment strategies when engaging suppliers with identified concerns • Completion of additional onsite supplier assessments for high risk / high spend suppliers

Approval

Approved by the Board of Monadelphous Group Limited.



Rob Velletri
Chair
18 November 2024

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 2024:

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	C/- Sinton Spence Chartered Accountants 2nd Floor, Brian Bell Plaza Turumu St Boroko National Capital District Papua New Guinea
Monadelphous Holdings Pty Ltd	100	Australia	116 520 908	59 Albany Highway Victoria Park, WA, 6100
Inteforge Pty Ltd	100	Australia	128 995 764	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
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.
Inteforge Engineering & Fabrication (Tianjin) Co. Ltd	100	China	91120116MA074HLY3N	No. 108, Luanhe Dongdao, Lingang Economic Zone, Binhai Administrative Area, Tianjin, P.R.C China.
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 Mongolia LLC	100	Mongolia	5672406	Suite 503, Ambassador Office Peace avenue 15A/5 The 1st khoroo Sukhbaatar District Ulaanbaatar city, Mongolia
M Workforce Pty Ltd	100	Australia	165 651 623	59 Albany Highway Victoria Park, WA, 6100
M&ISS Pty Ltd	100	Australia	600 471 341	59 Albany Highway Victoria Park, WA, 6100
Monadelphous Engineering NZ Pty Ltd	100	New Zealand	Company number: 5583905 NZBN: 9429041593585	C/- 19 Lang Parade Milton, QLD, 4064
Monadelphous Inc.	100	United States of America	FEIN 38-397047	c/- National Register Agents Inc. Suite 101, 160 Greentree Drive Dover, Kent 19904 Delaware USA
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

Monadelphous Investments Pty Ltd	100	Australia	614 290 087	59 Albany Highway Victoria Park, WA, 6100
MWOG Pty Ltd	100	Australia	614 889 351	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
Monadelphous International Holdings Pty Ltd	100	Australia	616 099 300	59 Albany Highway Victoria Park, WA, 6100
Evo Access Pty Ltd	100	Australia	169 739 324	59 Albany Highway Victoria Park, WA, 6100
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
Monadelphous Chile SpA	100	Chile	77.089.336-4	Isidora Goyenechea 2939, Piso 10, Las Condes, Santiago, Chile
MAQrent SpA	90	Chile	76.522.179-K	Avenida Del Valle 601, Officina 22, Huechuraba, Santiago, Chile
MMW Projects Pty Ltd	100	Australia	653 199 289	59 Albany Highway Victoria Park, WA, 6100
Monadelphous RTW Pty Ltd	100	Australia	651 780 228	59 Albany Highway Victoria Park, WA, 6100
BMC Holdings (Vic) Pty Ltd	100	Australia	115 599 178	59 Albany Highway Victoria Park, WA, 6100
BMC Welding & Construction Pty Ltd	100	Australia	086 781 400	59 Albany Highway Victoria Park, WA, 6100
BMC HV Electrical & Instrumentation Pty Ltd	100	Australia	151 147 527	59 Albany Highway Victoria Park, WA, 6100
BMC Civil Pty Ltd	100	Australia	637 193 223	59 Albany Highway Victoria Park, WA, 6100
Melchor Contracting Pty Ltd	100	Australia	615 704 660	59 Albany Highway Victoria Park, WA, 6100

Notes:

This statement does not apply to Monadelphous' joint venture entities, Mondium Pty Ltd and Zenviron Pty Ltd, as 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 2024
Identify the reporting entity	Introduction (page 3)
Describe the reporting entity's structure, operations and supply chain	Structure, operations and supply chain (pages 4-5)
Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity and any entities it owns or controls	Identifying risks of modern slavery (pages 6-8)
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 9-16)
Describe how the reporting entity assesses the effectiveness of these actions	Measuring effectiveness (page 17)
Describe the process of consultation with entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Introduction (page 3) Stakeholder consultation and collaboration (page 9)
Provide any other relevant information	Continuous improvement (page 18)

Appendix C

Figure 5 - Analysis of Tier 1, 2 and 3 supply chain

