



# MODERN SLAVERY STATEMENT 2023

# Introduction

This modern slavery statement is for Spiecapag Australia Pty Ltd (Spiecapag) ABN 53 067 306 138, covering the reporting period 1 January to 31 December 2023 (2023 reporting period). It has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) (the Act).

At Spiecapag, we acknowledge our duty to proactively combat modern slavery by instituting measures aimed at identifying and eliminating exploitation from our operations and supply chain. We recognise that combating modern slavery necessitates a collaborative endeavour from every part of our organisation, and we are dedicated to continually enhancing awareness, enacting policies, and promoting transparency and accountability. Through these efforts, we strive to eradicate modern slavery and uphold the fundamental tenets of human rights.

## Approval

This Modern Slavery Statement was approved by the Board of Spiecapag in their capacity as the principal governing body of Spiecapag on 19 June 2024.

This statement is signed by John Walsh in his role as Managing Director and Director of the Board of Spiecapag on 19 June 2024.



John Walsh  
Managing Director of Spiecapag Australia Pty Ltd  
19 June 2024





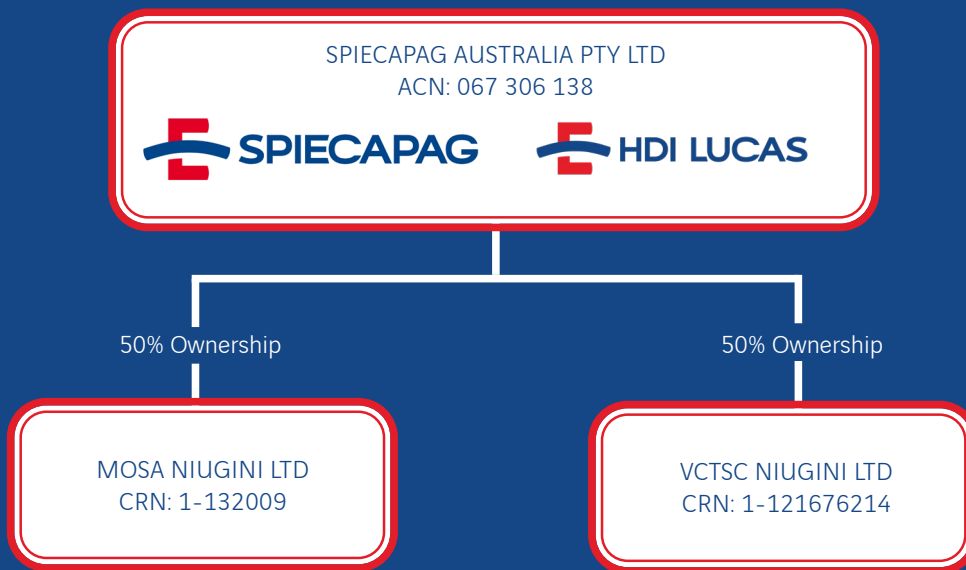
# Our structure, operations and supply chain

## Structure

Spiecapag Australia Pty Ltd (trading as Spiecapag and HDI Lucas) is a leading pipeline contractor headquartered in Brisbane, Queensland. Spiecapag Australia Pty Ltd is a wholly owned subsidiary of the French registered company Spiecapag SAS.

The ultimate parent company of Spiecapag is VINCI SA, a French company that is listed on the Paris stock exchange and is a member of the Euro Stoxx 50 index. In the 2023 reporting period, VINCI SA had revenues of €69.6 Billion and approximately 279,000 employees worldwide.

Spiecapag has a 50% interest in two Papua New Guinea (PNG) registered companies as shown below.



Spiecapag is also a 50% shareholder in Menard Oceania Pty Ltd & Spiecapag Australia Pty Ltd (MOSA JV) (ABN: 80 211 525 404), an unincorporated joint-venture that supports the Lihir Group Stabilisation Project in Papua New Guinea.



## Operations

Spiecapag's core business is undertaking specialist pipeline construction to deliver essential infrastructure projects across Australia and the Oceania Region.

Servicing the energy, resources, and utilities sectors, Spiecapag provides an extensive range of services covering design, engineering, procurement, construction, project management, training, and commissioning.

For the 2023 reporting period, Spiecapag employed 720 staff, across two offices in Brisbane (headquarters) and Perth, and the following six projects:

1. Kewdale White Oil Line Project (Western Australia);
2. Lihir Island Tailings Pipeline Rehabilitation Project - TK2050 (Papua New Guinea)
3. Western Outer Ring Main Project (Victoria);
4. Kurri Kurri Lateral Pipeline Project (New South Wales);
5. JANSZ-IO Compression Project (Western Australia); and
6. Lihir Ground Stabilisation Project - MOSA JV (Papua New Guinea).

## Supply Chains

In the 2023 reporting period, Spiecapag spent approximately \$150M purchasing products and services from more than 250 direct suppliers across eight countries.

Approximately 83% of Spiecapag's direct suppliers are located in Australia, with overseas procurement accounting for about 17% of our total procurement spend.

Spiecapag also has direct suppliers located in Canada, China, South Korea, Italy, Germany, India, PNG, and UK.

The main types of goods and services Spiecapag procures include:

1. Personnel, including via contractors and labour hire;
2. Pipe;
3. Valves and fittings;
4. Logistics;
5. Plant and equipment;
6. Quarry products;
7. Concrete products;
8. Technical services; and
9. Site amenities.





# Modern Slavery Risks in Operations and Supply Chain

Spiecapag is aware that the global construction sector is regarded as an industry with a higher degree of exposure to various forms of modern slavery.

## Potential modern slavery risks in our operations

In assessing the risk profile of our operations for the 2023 reporting period, we consider the fact that given Spiecapag undertakes the bulk of its operations in sites located within Australia, the likelihood of modern slavery conditions being in existence is significantly reduced within our direct operations. Australia has implemented robust legislative and regulatory frameworks to prevent, detect attempts at, and criminally punish all forms of modern slavery.

Notwithstanding, Spiecapag acknowledges the increased risk profile associated with our operations in Papua New Guinea, a country where the prevalence of modern slavery conditions is significantly higher than that of Australia. Labour force characteristics that may pose potential risks in our PNG operations include:

- The use of contractors and outsource labour (including third party labour hire agencies to source workers).
- The temporary nature of work types requiring non-permanent employment contracts, including temporary and fixed-term contracts.
- The use of lower skilled workers; and
- The isolated location of the project site.

These characteristics may mean that, in certain circumstances, Spiecapag has reduced visibility over the recruitment conditions used to source our indirect labour force.

## Potential modern slavery risks in our supply chain

The principal risk of modern slavery in Spiecapag's supply chain is that it might be directly linked to modern slavery practices through the businesses supply chain both for PNG and the Australian based operations. In the 2023 reporting period, Spiecapag has identified the following areas of its operations that may have modern slavery risks in its supply chain:

- a) Suppliers or sub suppliers that were to use raw materials produced using modern slavery in the manufacture of textiles, footwear, and branded products.
- b) Use of an indirect workforce provided by third parties where they engaged low skilled labour to provide cleaning services to our leased offices or site locations.
- c) Procurement of the following products:
  - i) Products containing steel.
    - (1) Steel could have been produced using raw materials extracted or refined under modern slavery conditions.
  - ii) Products containing rubber.
    - (1) May be procured as formed product, the production of which could have been done under modern slavery conditions, including the farming and supply of the raw material.







# Action taken to assess and address modern slavery risks

## Policies, Guides and Processes

Spiecapag understands that identifying and addressing modern slavery risks requires an adaptive approach that is underpinned by sound governance, policies, and processes.

As a wholly owned subsidiary of VINCI SA (a voluntary signatory to the United Nations Global Compact<sup>1</sup>), we are governed by VINCI's Guide on Human Rights (Guide), a framework document which is based on the United Nations Guiding Principles and the main international conventions<sup>2</sup>.

The Guide has identified five areas that cover the entire life cycle of projects as follows:

- Labour Migration and Recruiting Practices
- Working Conditions
- Living Conditions
- Human Rights Practices in the Value Chain
- Local Communities

Guidelines which constitute benchmarks for the five areas have been created to encourage Spiecapag employees dealing with human rights issues to consider how our existing processes and activities manage Spiecapag's modern slavery risk profile, and to identify areas for improvement.

Together with initiatives to raise awareness, and the sharing of information on best practice, Spiecapag is committed to developing a culture of prevention in this area. This is complemented by the requirements outlined in our own policies, codes, guides and processes relating to Quality, Remuneration, Health & Safety, Anti-Discrimination & Equal Employment Opportunity, Complaints & Grievance, Ethics, and Anti-Corruption.

Spiecapag also encourages the confidential reporting of concerns via the use of the VINCI Group Whistleblowing procedure.

## Training and Internal Awareness

All employees are required to undertake online Human Rights training as part of the onboarding process for new staff. The training is used as part of our broader efforts to increase company-wide awareness about modern slavery issues, whilst also better equipping new team members with the ability to identify modern slavery supply chain risks in new and existing suppliers.

## Supplier Engagement and Due Diligence

Spiecapag implements a robust procurement and purchasing process to provide a framework to identify, mitigate and manage procurement risks that may adversely affect our operations. Our vendor prequalification process is used to identify high risk third parties where additional checks are undertaken to ensure they are not engaged with any improper practice that may be inconsistent with our Ethics and Conduct expectations as set by our head entity VINCI SA.

## Recruitment Controls for Managing Modern Slavery Risks

Our direct workforce is covered by individual employment contracts and modern awards which confer at least minimum pay and entitlements and provide for consultation regarding significant operational changes where appropriate.

We ensure that when we engage with relevant recruitment agencies or labour hire providers, they comply with the provisions of the *Employment Regulation 1980* (PNG), together with all Philippine Overseas Employment Administration requirements for those employees we engage from the Philippines.

## Contractual Governance

During the reporting period Spiecapag continued implementation of modern slavery clauses in new supplier contracts, including the ability to terminate a supply contract if a supplier breaches a legislative requirement, or behaves in a manner that is inconsistent with our (VINCI) Guide to Human Rights and or our (VINCI) Code of Ethics and Conduct.

1 The United Nations Global Compact is the world's largest corporate sustainability and corporate social responsibility initiative. It supports global companies committed to responsible business practices in areas such as human rights, labour, the environment, and corruption.

2 The Universal Declaration of Human Rights, The International Covenant on Civil and Political Rights, The International Covenant on Economic, Social and Cultural Rights, The Fundamental Conventions of the International Labour Organisation, The OECD Guidelines for Multinational Enterprises; and The United Nations Guiding Principles on Business and Human Rights.

# Assessing the effectiveness of actions taken

Having an effective modern slavery program means that we can identify, assess and mitigate modern slavery risks in our operations and supply chain in a transparent, collaborative way, and using our leverage to effect positive change in the communities within which we work.

During this reporting period, our focus was to gain a better understanding of our modern slavery risks and how such risks may be present in our operations and supply chains. At this early stage, we are unable to adequately assess the effectiveness of the measures we have undertaken. However, we have commenced and will continue to work on developing our processes and systems to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains.

As part of our commitment to continuous improvement, we will use this coming year to implement a number of initiatives and associated actions that will help shape our modern slavery road map for the coming reporting periods.

## Our consultation processes

Spiecapag operates and is managed as an integrated group with overarching policies, systems and processes that are designed to be consistently applied across our operated functions and projects.

Consultation between Spiecapag and the entities we own or control was undertaken in the development of this statement. Consultation included involvement from representatives across our organisation.



Spiecapag Australia Pty Ltd  
145 Eagle Street  
Brisbane QLD 4000

[www.spiecapag.com.au](http://www.spiecapag.com.au)