



Modern Slavery Policy

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REV	DATE	DESCRIPTION	ORIGINATOR	CHECKER	APPROVER
0	20/10/24	Issued for Use	ARA	SPA	SPA
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Helix Engineering Pty Ltd, Helix Resources (Aus.) Pty Ltd and Helix Services Pty Ltd are a group of companies (known as Helix herein) who have developed this Modern Slavery Policy to ensure its workers and suppliers operate in a way such that modern slavery has no part in any works or supply. Helix primarily performs design, drafting, engineering, fabrication, construction, procurement, project management and supply of engineering and on-site personnel services. At Helix, we are committed to complying with the obligations under the *Modern Slavery Act (2018)* and other related legislation. This policy outlines the steps we have, and will continue to take to ensure no materials, goods or services are procured by or on behalf of Helix are the product of modern slavery.

Modern slavery refers to the exploitation such as forced labour, debt bondage, forced marriage, slavery, slavery-like practices and human trafficking. A person cannot refuse the work or circumstances due to threats, violence, coercion, deceptions and/or abuse of power (as per Walk Free, international human rights group <https://www.walkfree.org/what-is-modern-slavery/>).

Modern slavery is present in Australia and in many industries, including ones where Helix operates, such as mining and construction, which often rely on overseas workers. It is, therefore, our responsibility to also be aware of, and report on the risks present in the supply chain where modern slavery could potentially infiltrate. This policy demonstrates Helix's commitment to ensuring that to the best of our ability, modern slavery will not be apart of our supply chain, nor our supply of services to others. We have committed to do this to the best of our ability, however, it is extremely difficult to verify this information for all suppliers we utilise, so we aim to appropriately monitor and manage any risks we identify and can control. We also expect our suppliers and contractors to commit to the same stance, and take all possible precautions to ensure modern slavery is not present in their organisation and supply.

The Commonwealth Act requires any Australian entity with a minimum revenue of \$100 million to report on aspects of their business that are at risk to be infiltrated by modern slavery. Helix expects that any supplier that comes under this Act has submitted their report and has considered and described the risks of modern slavery within their organisation, highlighting any actions taken to reduce and eliminate these risks. Australian entities should continuously conduct a meaningful review of their supply chains and operations to identify and manage new or ongoing risks.

Helix is not required to complete a report under the Commonwealth Act; however, we are committed to identifying risks in all entities for modern slavery. Actions taken and reported include:

- Determining if there are any indications of modern slavery in any suppliers, services ordered;
- Ensuring that all aspects of Helix's operations are highly regulated and supervised to confirm all work being conducted by our organisation is not the product of modern slavery;
- Refining and supervising our labour hire process to exclude any chance of unknowingly participating in modern slavery;
- Monitoring the terms our suppliers set, and being suspicious of unusual turnaround times or payment terms;
- Reviewing any tender prices received to determine the wage offered is a liveable wage, and above the Australian minimum wage;

If modern slavery is detected by an employee of Helix, they should immediately inform their supervisor or the directors of Helix. Helix is willing to comply with all requests from law enforcement should they require any information or assistance.

Many challenges arise in the identification of modern slavery, particularly because supply chains are often long and complex, with many opportunities for modern slavery to infiltrate. Helix aims to take on suppliers that have transparent modern slavery policies and procedures to ensure they are also committed ensuring modern slavery is not a part of their supply.

When relevant, Helix will consult with specialists and experts for the correct steps to take to ensure modern slavery does not occur within any entity. This policy will be reviewed frequently and, if required, modified by the directors of Helix. It shall be implemented by the directors of Helix; however, all directors and supervisors shall be aware of this policy and the actions required should modern slavery be detected.

The target for modern slavery within Helix is **0 employees under modern slavery** and will remain so for all operations. We will regularly review the actions proposed to eliminate modern slavery and evaluate their effectiveness. We are willing to modify and add any new actions and directives to ensure we are always at the forefront of the movement to eliminate modern slavery and are always open to suggestions from within and outside of our organisation.