



**The Environmental  
Group Limited**  
*Engineering a Sustainable Future*

Engineering a sustainable future.



# Modern Slavery Statement

Reporting Period: FY25  
The Environmental Group Limited  
Publication Date: December 2025



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## 1. Purpose & Scope

This Statement is made in accordance with the Modern Slavery Act 2018 (Cth) ("the Act") to fulfil The Environmental Group Limited's (ACN 000 013 427) ('The Environmental Group', 'EGL' or 'the Company') obligations under the Act for the financial year 1<sup>st</sup> July 2024 to 30<sup>th</sup> June 2025.

This Statement will be updated on an annual basis in accordance with the requirements of the Act.

We respect human rights and take a zero-tolerance approach to modern slavery in accordance with the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights (UNGPs).

This Statement addresses how we identify, assess and address modern slavery risks within our operations and supply chains. The Environmental Group Limited is committed to ensuring there is transparency within the business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2018 (Cth). We expect the same high standards from all our suppliers, contractors, and business partners, and we fully expect that they hold their suppliers to the same high standards.

This Statement uses the term The Environmental Group Limited to refer to all its subsidiaries (identified in Section 3 below).

## 2. Definition of Modern Slavery

The Act defines 'modern slavery' with reference to the Commonwealth *Criminal Code* and international law. It captures:

- conduct that would constitute slavery and slavery-like offences, whether or not the conduct took place in Australia;
- human trafficking; and
- the worst forms of child labour.

Modern slavery relationships are based on exploitation and include grave abuses of human rights and serious crimes. Slavery and slavery-like conduct include human trafficking, servitude, forced labour, debt bondage, deceptive recruiting for labour or services, and child labour.

### 3. Reporting Entity and Structure

#### Mandatory Criterion (a) and (b)

The Environmental Group Limited is an environmental engineering company that provides products and engineering services to various industries to improve environmental outcomes and operates through specialised divisions.

The Environmental Group Limited is focused on engineering a sustainable future and providing products, services and spare parts through our operating divisions to a diverse range of clients across many industries.

- EGL Waste – Recycling and sorting technologies for efficient waste management and material recovery, including PFAS extraction technology for water, biosolids and soil.
- EGL Clean Air – Advanced solutions for controlling gas emissions, particle removal, and odour reduction, ensuring compliance with strict air quality regulations.
- EGL Energy – Enhancing combustion efficiency with heat exchange systems, biomass boilers, and autoclaves to optimise energy use and sustainability.
- EGL Baltec – Industry-leading noise control solutions, including intake and off-take systems for turbines and other industrial applications.

During the reporting period, the companies within The Environmental Group were consulted in relation to the development of this Statement. In accordance with the Act, The Environmental Group provides this information on behalf of the Company and its wholly owned subsidiaries as follows:

- The Environmental Group Limited
- The Environmental Group Share Plans Pty Limited
- Environmental Group (Operations) Pty Limited (formerly Environmental Systems Pty Limited)
- EGL Waste Service Pty Ltd.
- EGL Water Pty Ltd.
- Tomlinson Energy Service Pty Ltd.
- Ignite Services Pty Ltd.
- Active Environmental Services Pty Ltd.
- Baltec IES Pty Ltd.
- Airtight Pty Ltd.
- Total Air Pollution Control Pty Ltd.
- Advanced Boilers & Combustion Pty Ltd.

## 4. Our Commitment to Local and International Standards

Good governance is the collective responsibility of the Board and all levels of management. The Environmental Group Limited adopts contemporary governance standards and applies these in a manner consistent with our values. The Group's leadership team is accountable for upholding our Values and for acting with integrity. We support the intent of the 4th Edition of the Australian Securities Exchange (ASX) Corporate Governance Council's Corporate Governance Principles and Recommendations. Unless otherwise disclosed, we report against the requirements of these Principles and Recommendations.

Our Company has a core value of treating all people with dignity and respect. We are committed to operating with respect for human rights and working across our value chain to eliminate any forms of modern slavery.

The Environmental Group respects and adopts the values included in the main international standards for the protection of Human Rights:

- the United Nations Universal Declaration of Human Rights.
- the United Nations Guiding Principles on Business and Human Rights.
- the Declaration on Fundamental Principles and Rights at Work from the International Labour Organisation (ILO) and its fundamental conventions.
- the United Nations Convention on the Rights of the Child.
- the United Nations Global Compact.
- the Seoul Declaration on Safety and Health at Work.
- the United Nations Declaration on the Rights of Indigenous Peoples; and the ILO's Indigenous and Tribal Peoples Convention.

## 5. Risks of Modern Slavery in our Operations and Supply Chain

### Mandatory Criterion (c)

The most significant exposure to modern slavery risks for The Environmental Group remains within our supply chains.

Our senior operational management convene on a monthly basis with our Chief Executive Officer to report and consult on business performance and compliance. Our Board monitors our modern slavery processes for effectiveness and reviews future plans to measure and improve processes to protect all parties within The Environmental Group supply chain from modern slavery.

Much of our supplier base is in Australia, including the purchase of products and services required for day-to-day operations such as office supplies, utilities, cleaning, property services, logistics, travel, employment and training of staff, external legal advice, IT infrastructure, and print and promotional goods and services.

We have a diverse global supply chain that provides goods, raw materials, parts, and services across our portfolio of products and sites. We recognise that through our international supply chain and customers, The Environmental Group and its subsidiaries may be indirectly exposed to the risk of modern slavery.

Key areas of supply chain risk covered in our review processes and management strategies include:

- conflict minerals and raw materials
- disruption of supply chains caused by geopolitical tensions
- sourcing from low-cost countries
- sanctioned individuals and companies
- global shipping
- global slavery high-risk countries, regions and sectors.

## 6. Actions to Assess and Address Modern Slavery Risks

### Mandatory Criterion (d)

#### 6.1. *Assessing New and Current Suppliers*

The Environmental Group is committed to operating the business lawfully and ethically and only working with suppliers that are aligned to our values. Assessment of modern slavery risk forms part of The Environmental Group supplier onboarding process.

The Environmental Group has implemented systems and controls to ensure modern slavery risk is addressed within its business and supply chains. The initial assessment undertaken by The Environmental Group of modern slavery risks concentrated on potential supplier evaluations through its Group Procurement function.

All onboarded suppliers are assessed for compliance in the following areas:

- Modern slavery, including child and forced labour
- Responsible sourcing practices
- Whistleblower protections, anti-bribery, and anti-corruption measures
- Health, safety, and environmental standards

All new vendors are requested to complete a questionnaire and provide information to The Environmental Group regarding their position on modern slavery. The responses will be assessed to determine the level of risk. The questionnaire requires that suppliers advise whether they have assessed modern slavery risks within their businesses. When a supplier confirms they have done so, copies of their modern slavery statements and/or policies are requested and evaluated.

Where elevated risk is identified, The Environmental Group may undertake further evaluations, which can include desktop audits, interviews, and onsite audits. Audits may be conducted by The Environmental Group personnel or qualified external contractors, depending on the complexity of the risk and the expertise required. For vendors assessed as high risk, multiple onsite audits may be performed.

We seek to minimise modern slavery risks by:

- Working directly and closely with our suppliers to ensure they understand the expectations we have on them to operate in accordance with all applicable modern slavery laws. The Environmental Group values and observes all laws regarding corporate social responsibility, environmental and workplace safety protection, staff inclusion and diversity.
- Senior management regularly engage suppliers who may be considered high risk, based on location and services provided, including discussions regarding workforce operations.
- We continue to educate and remind our suppliers of our commitment and expectation of compliance to the Act.
- Our latest annual Modern Slavery Statement is available on our website.

Over the next two reporting periods, a new ERP system will be implemented, which will further strengthen controls around onboarding of new suppliers. Other modern slavery assessment tools will also be considered as part of this implementation.

## 6.2. *Terms of Trade and Conditions of Purchase*

Modern slavery provisions are included in The Environmental Group Terms of Trade, the Conditions of Purchase, and The Environmental Group Supplier Performance Management. The Environmental Group requires suppliers and customers to warrant that they are compliant with the Act, have no outstanding investigations, and have not been convicted of an offence under applicable modern slavery legislation. In addition, where Tin, Tungsten, Tantalum, or Gold (3T&G) are used, suppliers are required to maintain a source of origin or smelter records, which are to be provided to The Environmental Group upon request. The Environmental Group requires that its suppliers comply with its Supplier Performance Management, which includes specific conditions in relation to respect in the workplace and employee human rights. The Supplier Performance Management sets out The Environmental Groups expectations including the requirement that suppliers proactively identify and address risks of modern slavery practices in its business operations and supply chains.

## 6.3. *Sustainable Procurement*

The Environmental Group continues to conduct Sustainability Audits in relation to key suppliers in developing countries. This type of audit includes a focus on Workers' Rights and Modern Slavery. If any audited suppliers do not meet our expectations in this area, we may cease trading with them or, if there is an appropriate opportunity to use our relationship to push for positive change, we may give them a remedy period to enhance their operations in a way that aligns with our requirements – failing which trade would be ceased.

During the reporting period, The Environmental Group engaged approximately 1,000 suppliers and subcontractors to procure products and services. Of these, around 150 were offshore vendors. The majority of the Company's annual supplier expenditure was with suppliers and subcontractors based in Australia, with Vietnam representing the next most significant spend. Within this period, 42 vendors were requested to complete a questionnaire and provide information regarding their position on modern slavery. The responses were reviewed and evaluated to determine potential risk.

#### 6.4. *Employment Practices and Modern Slavery Training*

The Environmental Group is committed to ensuring employees' human rights are respected through its internal policies and practices.

Much of the workforce is employed directly, reducing the potential for direct cause modern slavery practices within The Environmental Group's operations.

All recruitment activities and appointments in Australia and internationally are fair, equitable, respectful, transparent, consistent, and confidential. The Environmental Group's employees are engaged under fair, just, and ethical employment conditions. The aim is for all employees to work in a safe and professional work environment in accordance with The Environmental Group's core values.

The Company is committed to fostering an inclusive and equitable workplace that celebrates the diversity and inclusion of its workforce and provides opportunities for First Nations people.

We will continue to develop the appropriate policies and procedures as required.

The Environmental Group has developed its own internal online training called "Modern Slavery EGL Workshop". The Company is committed to continually improving awareness of modern slavery as a crucial part of identifying and addressing business risks.

Training, both onsite and online, is provided for all applicable employees to ensure they understand their responsibility under the Act. All Group Procurement and Finance employees have completed this training.

- We will continue to educate our employees on the risks associated with modern slavery.
- We regularly review and update our induction program to ensure it reflects any changes in legislation and employer obligations.

## 7. Measures to Assess the Effectiveness of the Actions Taken

### Mandatory Criterion (e)

The Environmental Group remains committed to applying and refining its modern slavery policies and procedures. It continues to consult with its stakeholders to evaluate and improve the effectiveness of such procedures.

The effectiveness of the actions of The Environmental Group in addressing its modern slavery risks is assessed in several ways, including but not limited to:

- Reviews of both its modern slavery framework and procedures to evaluate their effectiveness in both identifying and mitigating risks.
- Ongoing assessment of the changing risk profiles of operations and its supply chain.
- Number of identified high risk suppliers followed up in order to mitigate risks.
- Number of potential suppliers followed up to clarify and mitigate risks.
- External audits of its policies and procedures.
- Increasing employee awareness and appreciation of such risks.

## 8. Consultation Process

### Mandatory Criterion (f)

The Environmental Group recognises the importance of internal and external communication to minimise the risk of modern slavery within its operations (as identified in Section 3). Key internal stakeholders include the Board; Executive and Senior Leadership Team; Health, Safety, Environment and Quality (HSEQ) Team; and the Group Procurement Department. Such communication ensures stakeholders (internal and external) are provided with timely, accurate and thorough information concerning modern slavery risks and concerns to ensure that The Environmental Group operations and supply chains can be managed effectively and minimise the risk of exposure to modern slavery. These key stakeholders were engaged throughout the reporting period in relation to addressing the mandatory criteria of the Act, and in implementing the actions as set out in this document.

## 9. Commitment and Approval from our CEO

The Environmental Group remains committed to preventing and addressing the risks associated with modern slavery. We are committed to meeting and indeed exceeding our obligations under the Australian Modern Day Slavery Act 2018 and therefore ensuring our company and social responsibility is accepted and undertaken with good intention.

This Statement has been approved by the Board of Directors. Jason Dixon as Chief Executive Officer was authorised to sign this Statement on behalf of The Environmental Group Limited on the 18<sup>th</sup> December 2025.

Approved:



Jason Dixon  
Chief Executive Officer, The Environmental Group Limited