



Modern Day Slavery Statement

Reporting Period: 01 January 2024 to 31 December 2024

Date of Issue: 26 June 2025

Issued to: Callidus Group Management Team
Australian Border Force

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Introduction

Change to Group Structure

As at 01 December 2023, PON Group sold the Callidus Group to SCF Partners.

Previous editions of these reports were submitted on behalf of the PON Holding Australia Pty Ltd. This report is now submitted only on behalf of the Callidus Group.

This statement is made pursuant to the Australian Commonwealth Modern Day Slavery Act 2018, and sets out to identify and mitigate any form of modern day slavery that may be present within the Callidus Group of companies and our supply chains.

This statement follows the the seven mandatory criteria (MC1 to MC7) as set out in the Guidance for Reporting Entities and draws on the United Nations Guiding Principles on Business and Human Rights.

Reporting entity:

- Callidus Process Solutions Pty Ltd (CPS), Head Office.

Joint reporting entities:

- Callidus Welding Solutions Pty Ltd (CWS), 100% owned Subsidiary of CPS.
- Callidus New Caledonia SARL (CNC), 100% owned Subsidiary of CPS.
- Callidus Process Solutions Madagascar SARL (CMA), 100% owned Subsidiary of CPS.

(Collectively referred to as **Callidus Group**)

Our business

Callidus Group is a West Australian registered company since January 1997. Now consisting of CPS, CWS, CNC and CMA, the primary business centres around providing engineering solutions to the Nickel Industry and Oil & Gas Industry. This includes procurement, servicing, repair and modification of valves and associated equipment within our workshops and on-site work such as shutdown management and recertification of pressure safety valves.

CWS joined the group to expand on the range of welding, fabrication and erosion control services.

CNC and CMA were opened to provide local maintenance support to clients in those countries.

CPS opened branch offices and workshop in the Philippines, Timor Leste and Papua New Guinea to provide local maintenance support to clients in those countries.

Supply chain overview

Callidus Group procure complete valves, spare parts, associated equipment and consumables from a wide variety of vendors in many countries around the world. This is driven primarily by the need to procure from the Original Equipment Manufacturer (OEM) stipulated by the client.

Support services are generally procured local to the facility requiring the service, with corporate contracts in place for services such as I.T.C., Accounting, Banking etc.

Corporate Social Responsibility (CSR)

As part of our CSR strategy and policies, the Callidus Group of companies are committed to making a positive ethical, environmental and social contribution to society. Part of this commitment is to ensure all possible risk of any form of modern slavery within our business activities are identified and mitigated. This requires close working relationships with clients and key suppliers which is something Callidus strive to achieve.

Addressing modern slavery

Callidus are adopting a 3 step approach to addressing modern slavery impacts identified through either direct or indirect activities;

1) Audit and identification

All facilities and supply chains are being audited to identify any potential risk.

2) Resolving and mitigating

Actions are put into place to address the risk and either resolve the issue completely or mitigate the risk as far as possible.

3) Training and communication

Training is being implemented internally to educate management and procurement personnel on the risks around modern slavery. Communication is in place both internally and externally on our expectations and the effectiveness of our actions.

Callidus submit this statement as part of our continued efforts to develop and improve our processes and procedures to ensure modern day slavery is eradicated within our business and our business partners.

Approvals:

This statement for Callidus Process Solutions Pty Ltd is approved by the Board of Callidus Process Solutions Pty Ltd as the principal governing body on 26 June 2025.



Ed Pepper

Chief Executive Officer

Callidus Process Solutions Pty Ltd. (CPS)

Date of Approval: 26 June 2025



Duncan Bews

Chief Operations Officer

Callidus Welding Solutions Pty Ltd. (CWS)

Date of Approval: 26 June 2025



Paul Clarke

Director

Callidus Process Solutions Madagascar Sarl (CMA)

Date of Approval: 26 June 2025



Guillaume Bunel

General Manager

Callidus Process Solutions New Caledonia Sarl (CNC)

Date of Approval: 26 June 2025

MC1: Reporting Entities

Callidus Process Solutions Pty Ltd (Head Office)

Australian Company Number: 077 149 529

Registered Office: 18-20 Ledger Road, Balcatta, WA, 6021, Australia

Operational Locations: Australia: Perth, Adelaide, Brisbane, Darwin, Karratha
Philippines: Manila (Branch Office)

Status: Private Company

Callidus Welding Solutions Pty Ltd

Australian Company Number: 104 455 164

Registered Office: 18-20 Ledger Road, Balcatta, WA, 6021, Australia

Operational Locations: Australia: Perth

Status: Private Company

Callidus Process Solutions Madagascar SARL

Company Registration Number: 2013 B 00110

Registered Office: Immeuble Wu Chao Ying, Tanandava – RN2,
Toamasina 501 - Madagascar

Operational Locations: Madagascar: Toamasina

Status: Private Company

Callidus New Caledonia SARL

Company Registration Number: 779025.001

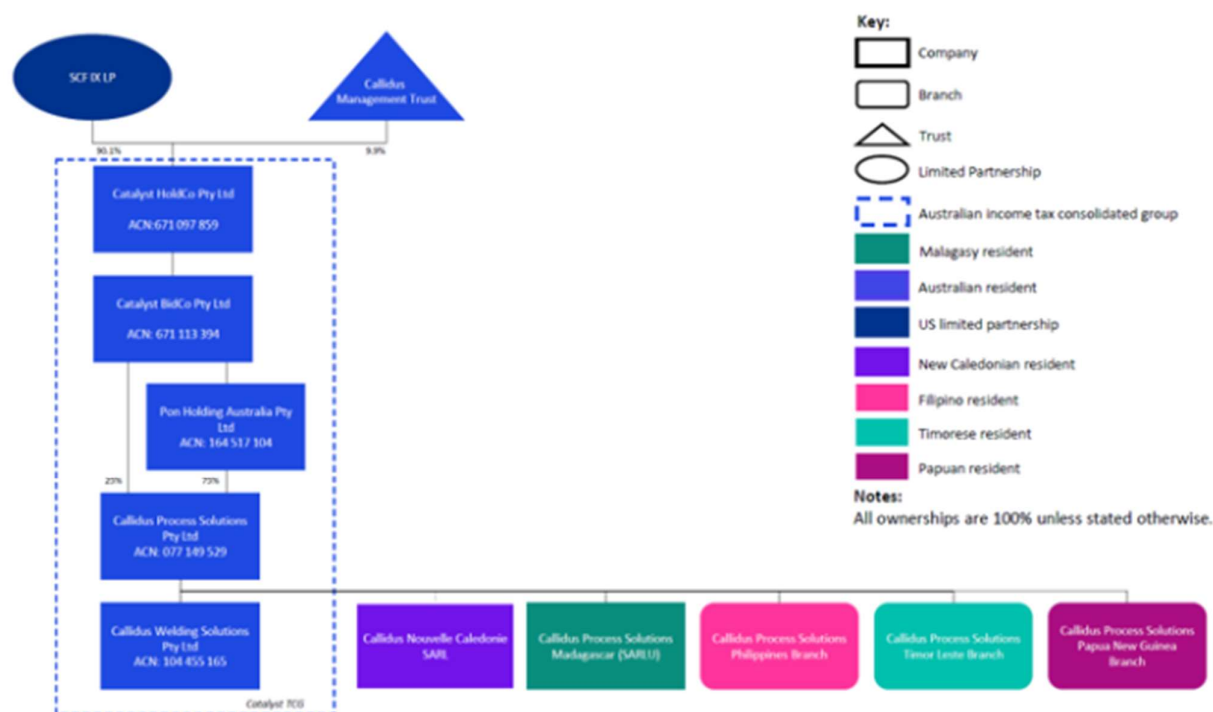
Registered Office: 13 Rue Georgette Mourin, Parc des entreprises de la Yahoué,
Normandie, BP 30033, 98895 NOUMEA Cedex, New Caledonia

Operational Locations: New Caledonia: Noumea

Status: Private Company

MC2: Structure, Operations and Supply Chains.

Structure:



Workforce Composition (as at 31/12/24):

	Direct	Contractor	Agency	Temporary	Seasonal
CPS	204	0	0	0	0
CWS	50	4	0	0	0
CMA	5	28	0	0	0
CNC	10	0	0	0	0

Union membership is confidential between the employees and the Union. Individual membership is not reported to the Company so actual numbers are unknown. The Australian Metal Workers Union (AMWU) has members at CPS and CWS. The Union des Syndicats des Ouvriers et Employés de Nouvelle-Calédonie (USOENC) has members at CNC. There are no known union members at any other entity.

Operations:

Main Products Supplied:

Callidus Group

Valves, Actuators, Spare Parts, Pipes, Elbows, Vessels and Ancillary Equipment.

Products can be sourced from Original Equipment Manufacturers and/or agents and distributors anywhere in the world.

Some products are manufactured by Callidus using raw material (e.g. titanium plate) being sourced primarily from China.

Main Services Offered:

SERVICE	LOCATION
Supply	CPS, CNC, CWS
Overhaul and Repair	CPS, CNC, CWS, CMA
Engineering Support	CPS, CNC, CWS
Pressure Testing	CPS, CNC, CWS, CMA
Erosion and Corrosion Control	CPS, CWS, CMA
Calibration	CPS
Valve Recertification	CPS, CNC, CMA
Welding / Fabrication	CWS
On-Site Labour	CPS, CNC, CWS, CMA

Supply Chains:

Main categories of products/services/parts/raw material that is procured, and sourcing country.

Category of Product/Service	Country of Purchase	Origin of Service/Material
Callidus Group:		
Valves and Spare Parts	Australia, Malaysia, USA, Canada, Japan, China, Singapore	USA, Mexico, Canada, UK, Italy, Spain, Netherlands, Austria, Germany, Belgium, France, China, Malaysia, Singapore, Japan, Hungary
Pipes, Elbows, Raw Material, Fittings	Australia, China	Australia, Austria, Germany, China, India, Malaysia, Taiwan, Europe.
Services	Australia, New Caledonia, Philippines, Madagascar, Timor Leste, Papua New Guinea	Worldwide

Vendors are either:

Original Equipment Manufacturers (OEM).

- In this case they are usually dictated by the Client, either by way of being an approved vendor of the client, or by way of providing spare parts to repair previously supplied OEM equipment.

Agents / Distributors:

- Acting on behalf of the OEM in a specific region. We may be directed to deal with agents/distributors by the OEM.

Operational Third Parties:

- Parts manufacturer, machine shops, freight forwarders, calibration services etc. Selected by way of Callidus Group approved vendors based on performance, cost, ability to meet deadlines.

Commercial Third Parties:

- I.T. Support, Insurance Brokers, Realtors, Cleaners, etc. Selected by location, ability to meet the scope of work.

Goods and services are provided by these vendors all year round, i.e. not seasonal.

MC3: Risk Assessment

Operations : Risk Review

There are three main ways the Callidus companies can have an impact on Human Rights:

- Cause
- Contribution
- Linkage

Cause:

A review of the eight types of exploitation defined by The Act was completed to identify any risk within our own operations caused by our own actions.

Trafficking in persons
• No Risk Identified
Slavery
• No Risk Identified
Servitude
• Local workers in third world countries employed through a sub-contractor.
Forced labour
• No Risk Identified
Forced marriage
• No Risk Identified
Debt Bondage
• No Risk Identified
The worst forms of child labour
• No Risk Identified
Deceptive recruiting for labour or services
• No Risk Identified

Contribution:

Contribution can be made in two ways;

- Contribution through a business relationship
- Contribution in parallel (multiple entities contributing to a greater impact).

Contribution through a business relationship
• Undue pressure on Vendors to meet deadlines/budgets may result in a breach of labour standards in order to deliver.
Contribution in parallel
• No Risk Identified

Linkage:

Callidus could be linked to Modern Day Slavery breaches through its relationship with it's vendors.

To identify potential high risk areas in our supply chain we have used the following references;

Country Risk:	Walk Free Foundation Global Slavery Index 2018, Appendix 2, Part C, Table 6 and Table 7.
Product Risk:	Walk Free Foundation Global Slavery Index 2018, Appendix 3, Table 2.
Service Risk:	Walk Free Foundation/International Labour Office, Global Estimates of Modern Slavery, Part 1, Section 1.2.1, Figure 9.

Country Risk
• Products, services and raw materials originating from high risk countries. China, Malaysia, Singapore, India, Taiwan, Madagascar, Papua New Guinea, Thailand, Turkey, Vietnam, Japan.
Product Risk
• Clothing (Uniforms, PPE) • Electronics
Service Risk
• Cleaners • Manufacturing

MC4: Due Diligence and Remediation

Due Diligence:

Identifying and assessing:

Cause Risk

- Local workers in Madagascar are employed through a sub-contractor.

To address this risk the Sub-contractor must submit monthly payroll information to CPS for review and approval. Interviews with contractor employees are carried out to confirm payments are made correctly. Regular discussions around working conditions are carried out between employees and General Manager for Madagascar. The sub-contractor is a natural person who resides in Madagascar and also provides other services for the Company. In 2024, additional audit on payslips submitted to employees and payment to third party pension scheme.

Contribution Risk

- Breach of Labour conditions by vendor.

To address this risk only reputable vendors are used. The vendor is requested to quote lead times allowing them time to complete the work. Vendor assessments are carried out to confirm ability to perform work safely and ethically. In 2024, no complaints were received by vendors relating to undue pressure to perform or meet deadlines.

Linkage Risk

Callidus use a wide range of vendors, for a wide range of products and services, sourced from a wide range of countries. To identify potential high risk areas in our supply chain we map products and services against the following;

Country Risk:	Walk Free Foundation Global Slavery Index 2018, Appendix 2, Part C, Table 6 and Table 7.
Product Risk:	Walk Free Foundation Global Slavery Index 2018, Appendix 3, Table 2.
Service Risk:	Walk Free Foundation/International Labour Office, Global Estimates of Modern Slavery, Part 1, Section 1.2.1, Figure 9

In addition, vendors are asked to confirm the following;

- 1) Are they currently reporting on Modern Day Slavery.
- 2) Do they have a Modern Day Slavery / Human Rights Policy.
- 3) Do they address Modern Day Slavery Risk within their Terms and Conditions of Purchase.
- 4) Will they sign to confirm acceptance of Callidus Group of Companies Supplier Statement on Modern Day Slavery.

Finally an internet search is carried out to identify any existing news stories relating to any kind of breach.

Based on the vendors response, they are scored against each of the assessment points above and given an overall Risk Category.

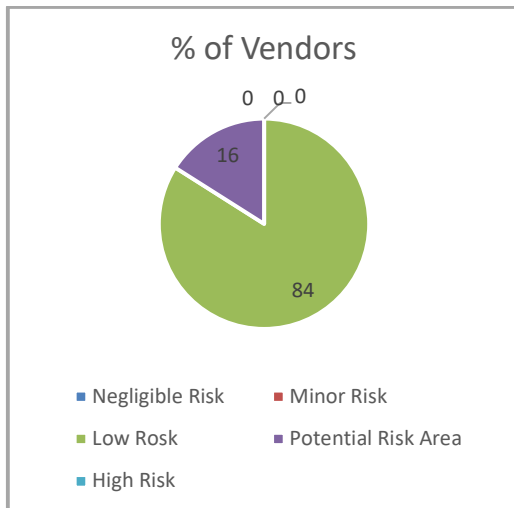
Total Score	Risk Category	Definition
1 - 6	A	Negligible Risk
7 - 100	B	Minor Risk
101 – 2,000	C	Low Risk
2,001 – 100,000	D	Potential Risk Area
>100,000	E	High Risk

A Risk Category of 'C' – is an acceptable starting point for vendors complying with minimum requirements.

Vendors that are proactively taking steps to mitigate their risk and can demonstrate this can potentially score an 'A' or 'B'.

Vendors with higher risk scores 'D' or 'E' will be subject to further review to confirm the accuracy of the rating. A decision is then made on future use of this vendor and any other action that should be taken.

High Level Risks identified:



Total of 4 (Four) vendors score just over 2,000 (2,079, 2,376, 2,376, 2,592).

This was due to 3 (three) having a high Country Risk and 1 (one) having no documented Policy or Reporting.

The three with the Country Risk have had site visits completed.

The one with no documented Policy or Reporting has had the services procured reduced to the absolute minimum.

Integrating the findings:

Training : Modern Day Slavery training has been developed and distributed across all Opcos to raise awareness. This is a requirement for all employees to complete and forms part of the onboarding process.

Reporting : This report is published publically and made available to all employees.

Communication : Direct reporting channels for identified impacts or concerns are established in each Opco.

Tracking Performance:

Annual reviews are performed to ensure training is rolled out and supplier risks are identified and mitigated.

Public Communication:

This report will be published publicly as per reporting guidelines.

Remediation:

For the year 2024 there were zero impacts identified. As such, no remediation activity has occurred.

MC5: Effectiveness

The individual Opco's monitor the effectiveness of their actions in a number of ways:

- Management Review of this report and supporting documentation.
 - Annual review of actions taken, any breaches etc..
- Review of the Risk Management Process to ensure M.D.S. risks are included.
 - Internal review as part of the ISO9001 requirement to review and ensure process are up to date and remain effective.
- Audits to ensure controls are implemented, e.g. training.
 - Internal audit of control, e.g. ensuring training is being carried out in a timely manner.
- Review of actions taken to ensure they are completed on time.
 - Regular review of actions to ensure they are completed in a timely manner and achieve the expected outcome.
- Grievance reporting procedure is in place and communicated to all staff.
 - Documented procedure and communication channels/contacts are communicated. H.R. follow up on necessary actions to address any issues.
- Engagement Surveys (OPCO specific) / Employee feedback – and then actioning of any issues raised.
 - CPS/CWS/CMA and CNC completed a full Engagement Survey of all personnel in 2024 with the intention of repeating every two/three years.
 - Employee feedback sought at all locations as an open form of communication at any time.

MC6: Consultation

All reporting entities were consulted at the highest level regarding the Guidance for Reporting and actual report contents.

Each entity is responsible for the roll out of training within their own employees.

Feedback from consultation with each entity is collected and collated at the Reporting Entity level to ensure consistency across all areas of the business.

Results are reviewed at Senior Management level and any high risk areas identified are to become a focus for the next report.

MC7: Other Relevant Information

No further information to report.