

Modern Slavery Statement FY2025



RESOURCES

INFRASTRUCTURE

NEW ENERGY

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Overview

At PARC Engineering, we pride ourselves on building strong relationships with our people, our clients, and our suppliers. Our organisational values reinforce this every day.

Quality Delivery – We set clear standards and deliver work that meets them, first time and every time.

Strong Leadership – We lead by example, we take ownership, and we develop our people.

Safe Execution – We plan our work, control our risks, and protect our people and communities.

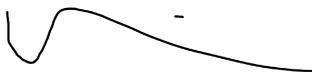
Integrity – We do the right thing, we are transparent, and we keep our commitments.

These PARC values shape our culture and guide how we engage with local communities and Traditional Owners. We believe that lasting relationships make us better equipped to promote an ethical workplace that is free of human rights abuses. PARC does not tolerate modern slavery in any form, direct or indirect, and we expect the same standards from our clients, suppliers, and subcontractors.

During the 2025 financial year, we strengthened our modern slavery risk management framework by reviewing and updating policies, procedures, and contractual terms. We enhanced supplier prequalification questionnaires, improved induction content, and delivered awareness training across the business. These updates extended beyond internal policies to external resources, our website content, and our contracting templates, so we can efficiently capture and assess any matters that may indicate a breach of human rights.

We are proud to report that no instances of modern slavery were identified in our operations or supply chain during the 2025 reporting period. This outcome does not reduce our commitment to continual improvement. We will keep maturing our due diligence processes, our controls, and our transparency.

Our governance is clear and transparent. Operational leadership is responsible for implementing our approach on behalf of the Board, guiding the evolution of our modern slavery risk management framework, and reporting on progress each quarter.

A handwritten signature in black ink, appearing to read "Daniel Debattista".

Daniel Debattista

Managing Director

PARC Engineering Pty Ltd

Dated, 01 November 2025

This statement was approved by the Board of PARC Engineering Pty Ltd on 1 November 2025.



Our Structure and Operations

Reporting entity

PARC Engineering Pty Ltd, (PARC), (ACN 624 974 385) is an Australian proprietary limited company registered at 2 Sleat Road, Applecross WA 6153. Contact: phone (08) 6444 1183, email info@parceng.com.

Who we are

PARC Engineering provides multidisciplinary project solutions to the resources, energy, and infrastructure sectors. Core capabilities include civil, structural, mechanical, and piping works, electrical and instrumentation, brownfields modifications, shutdowns and maintenance, minor capital works, and project management.

Where we operate

Our head office is in Perth. We deliver projects across Western Australia and, when required, other Australian jurisdictions. Our teams mobilise to operating mine sites, ports, processing facilities, and associated infrastructure. This often involves rapid ramp ups, integration with client systems and close coordination with principal contractors.

Workforce profile

PARC employs approximately 400 people across Australia. Professional and technical staff in Perth cover engineering, planning, commercial, finance, people and culture, procurement, and information technology. Site based teams undertake construction and maintenance activities. Common trades and competencies include civil, electrical, welding, fitting, rigging, scaffold, and supervision, together with shutdown and commissioning crews. Engagement is under Australian workplace laws. Right to work checks are completed prior to commencement. We do not retain original identification documents, and we do not permit worker paid recruitment fees.

Systems and certifications

Project and procurement records are maintained in enterprise systems that support traceability and assurance. Our management systems are aligned with ISO 9001 Quality Management and ISO 45001 Occupational Health and Safety. We review alignment with ISO 14001 Environmental Management in the context of client expectations and value to our operations.

Our Governance

Board oversight and direction

The Board is accountable for effective management of modern slavery risk. The Board sets expectations, approves this statement each reporting period and receives regular updates on risks, actions, and outcomes. Its role is to guide and monitor the company in the interests of our employees, clients, shareholders, and the wider community.

Operational leadership

Implementation is led by the Managing Director and operational leaders, including the General Managers, Operations Managers, Human Resources Manager, HSE Manager and Project Managers. Commercial and Procurement support implementation through contract controls,



supplier prequalification, and sourcing decisions, with Quality coordinating assurance activities.

Risk management framework

Modern slavery risk is integrated into PARC's risk management. Human rights risks are identified and assessed with reference to jurisdiction, sector, and supplier category. Risks are recorded in the corporate risk register with owners, controls, and actions, and are reviewed on a set cycle. HSE and HR oversee entries related to human rights on behalf of the Board.

Policies and controls

Our approach are supported by the Code of Conduct, Modern Slavery Policy, Supplier Code of Conduct, Whistleblower Policy, Equal Opportunity, WHS, Anti bribery and Corruption, and Procurement and Contracting standards. Modern slavery clauses are included in master agreements, subcontracts, and purchase orders, and require cooperation, record keeping and corrective action.

Training and awareness

All staff complete induction that covers worker rights and how to raise concerns. Targeted refreshers are provided to Procurement, Commercial, HR, HSE and Project leaders.

Grievance and whistleblowing

Concerns can be raised confidentially through approved channels, including an independent whistleblower facility. We protect confidentiality and do not tolerate retaliation. Substantiated matters are investigated and remedied with progress reported to management and the Board.

Risks of Modern Slavery, Operations

The inherent risk within an Australian workforce is lower than in many jurisdictions. However, operational pressures can create conditions where risk emerges, particularly where there is rapid mobilisation, long rosters in remote locations, or multi-tier labour sourcing.

Key operational risk drivers

- Rapid ramp ups for shutdowns and critical path works can strain supervision and welfare checks.
- FIFO and remote work can isolate workers and limit access to grievance channels.
- Third party transport and accommodation can reduce direct visibility of worker conditions.
- Multi-tier labour arrangements can obscure recruitment practices further down the chain.

How we respond

We use premobilisation checks, right to work verification, clear site inductions, and accessible grievance channels. Supervisors are briefed on worker welfare indicators. HR and payroll perform routine reconciliations and periodic reviews for award compliance. We do not retain original identification documents. We prohibit worker paid recruitment fees. Where subcontracting is necessary, we require visibility of labour sources and insist that suppliers meet standards equivalent to our own.

Risks of Modern Slavery, Supply Chain

Our tier one suppliers are predominantly Australian businesses. At lower tiers, goods and some services may be manufactured or sourced internationally. Reduced visibility, complex tiers, and weaker labour protections in some countries can introduce risk further down the chain.

Higher inherent risk categories

Categories that commonly present elevated risk in the Australian contracting context include PPE and uniforms, selected electrical and electronic components, aluminium products, solar related components, cleaning and security, and lower skilled labour services.

Risk signals we consider.

- Country risk and sector risk for declared inputs.
- Recruitment models, including agency reliance and labour hire.
- Presence of grievance mechanisms and the treatment of reports.
- Traceability to manufacturer and country of origin.
- Openness to audits, declarations, and corrective actions.

Actions Taken to Address Modern Slavery Risk

Framework and governance

PARC operate under a modern slavery framework approved by the Board. It sets expectations for our people and our suppliers and explains how we prevent, detect, and respond to risk across operations and supply chains. Operational leaders implement the framework on projects, in sourcing decisions and through support functions.

Workforce controls

Controls are applied across the employment lifecycle. Right to work checks are completed before engagement. Terms and conditions are set out clearly. Pay and conditions meet legal requirements. We maintain accessible grievance channels. We do not retain original identification documents, and we do not permit worker paid recruitment fees.

Supplier due diligence and monitoring

Due diligence is risk based. New suppliers' complete prequalification that covers human rights policies, recruitment practices, use of agencies, grievance mechanisms and traceability to manufacturer and country of origin. Trained reviewers assess responses and apply proportionate checks. Active suppliers are refreshed on a cycle, and higher risk categories receive deeper review. If concerns remain unresolved after reasonable opportunity to improve, we do not proceed or we disengage with care for worker welfare.

Contracting requirements

Modern slavery clauses are included in master agreements, subcontracts, and purchase orders. Contracts reference our Supplier Code of Conduct and Modern Slavery Policy. Clauses require cooperation, record keeping and corrective action, and allow proportionate remedies, including suspension or termination for cause where necessary.

Training and awareness

All staff complete induction that includes modern slavery awareness. Targeted refreshers are delivered to Procurement, Commercial, HR, HSE and Project leaders. Toolbox materials are available for shutdowns and rapid mobilisations so that practical messages reach site teams when needed.

Assessing effectiveness

At PARC, we are committed to continually improving our modern slavery risk management framework. By adding rigour to this framework over time, we aim to mitigate risks that may affect our suppliers, our clients, and our people. We collate insights from our due diligence activities to understand how well our framework is working, and we will keep broadening the quality and depth of this information so it can guide future priorities.

We will continue to communicate transparently about modern slavery risk in our operations and supply chains. Clients, vendors, and other stakeholders seeking information beyond what is disclosed in this statement will be directed to PARC’s HR Management team for further details.

Regulatory compliance

The responses to the mandatory reporting criteria of the Modern Slavery Legislation are shown in the table below:

Modern Slavery Legislation	Section
Identify the reporting entity	Reporting entity Page 4
Describe the reporting entity’s structure, operations, and supply chains	Our Structure and Operations Page 4
Describe the risks of Modern Slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Risks of Modern Slavery, Operations Page 5 Risks of Modern Slavery, Supply Chain Page 6
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Actions Taken to Address Modern Slavery Risk Pages 6 and 7
Describe how the reporting entity assesses the effectiveness of these actions	Assessing effectiveness Page 7
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Consultation and approval Page 7
Provide any other relevant information	

Consultation and approval

This statement has been prepared under the direction of the Board of PARC Engineering Pty Ltd, which is responsible for overall governance of modern slavery risk and for approving this statement. Leaders from Operations, Procurement, Commercial, HR, HSE, Quality and Finance



were consulted to confirm the description of our structure, operations and supply chains, our risk assessment, the actions taken during the period and our forward plan.

This statement is published pursuant to section 14 of the Modern Slavery Act 2018. It was approved by the Board of PARC Engineering Pty Ltd on 1 November 2025 and signed by the Managing Director.



BUILT FOR THE CHALLENGE