



PHE Group

Modern Slavery Statement

2025

Issued pursuant to the Modern Slavery Act 2018 (Cth)

Reporting Entity	PHE Group Trust
ABN	98 422 980 861
Reporting Period	1 July 2024 to 30 June 2025
Legislation	Modern Slavery Act 2018 (Cth)

Introduction

Modern slavery is a serious breach of human rights and a global challenge that impacts millions of people through exploitation, coercion, and control. While it is a global challenge, addressing the risk of modern slavery requires collective vigilance and action across governments, industries, and supply chains.

This Modern Slavery Statement is provided by PHE Group Trust ("PHE Group") (ABN: 98 422 980 861) pursuant to the requirements of the Modern Slavery Act 2018 (Cth) ("the Act") to report on the actions taken to assess and address modern slavery risk exposures in its operations and supply chain during the financial year ended 30 June 2025 ("the period"). The Act defines modern slavery as including eight types of serious exploitation:

- trafficking in persons
- slavery
- servitude
- forced marriage
- forced labour
- debt bondage
- deceptive recruiting for labour or services
- the worst forms of child labour

PHE Group is not aware of any instances of modern slavery within its operations or supply chain during the period.

Reporting Structure

This Statement is made by PHE Group. The statement covers the operations of PHE Pty Ltd, PHE Mining Pty Ltd, PHE Power and Infrastructure Pty Ltd, PHE Engineering Pty Ltd, PHE Logistics Pty Ltd, and PHE HV and Switchboards Pty Ltd.

PHE Group is comprised of commonly owned private companies, operating in Australia. PHE Group is solely owned by the Director, who retains ultimate responsibility for governance and oversight of the business.

Oversight of PHE Group's approach to modern slavery sits with the Director, with responsibility for implementation and day-to-day management supported by senior management across procurement, compliance, health and safety, and project delivery functions. Oversight is maintained through established governance processes, supporting consistency, accountability, and continuous improvement across the business.

Operations and Supply Chains

PHE Group operates within Australia, delivering industrial electrical construction, installation, communications, maintenance, and logistics services across infrastructure, mining, and resources sectors in metropolitan, regional, and remote locations within Australia. The business supports clients across the full project lifecycle, from early design and planning through to installation, commissioning, ongoing maintenance and logistics support. The business employs approximately 500 full-time equivalent personnel nationally and maintains offices across Australia.

For the period, the vast majority of PHE Group's work was undertaken within Australia across its core sectors of infrastructure, mining and resources. PHE Group's clients were Australian-registered businesses and were therefore also subject to the Australian Modern Slavery Act 2018.

PHE Group engages subcontractors that are also predominantly local businesses operating under industry-standard terms and conditions.

PHE Group's supply chains include subcontracted services and the manufacture and supply of products used in project delivery, such as cables, switchboards, fixtures, and fittings. Most products are procured through Australian-based wholesalers. Supplier selection considers both quantitative factors, including price, quality, and lead times, and qualitative factors such as values alignment, ethical sourcing practices, labour standards, and capacity.

To support ethical and transparent operations, PHE Group maintains ISO-certified management systems for Quality (ISO 9001:2015), Environmental Management (ISO 14001:2015), and Occupational Health and Safety (ISO 45001:2018). Supplier due diligence includes consideration of compliance history, safety performance, business conduct, and sourcing practices.

To date, there have been no reported incidents of modern slavery identified within PHE Group's operations or supply chains, and the business remains proactive in monitoring and upholding high standards of conduct among its partners.

Risk Assessment

PHE Group undertook a review of its exposure to modern slavery risks during the reporting period. Overall risk was assessed as low, having regard to the geographic location of operations, the regulated nature of the Australian labour market, and the industries and sectors in which PHE Group operates.

In assessing risk within its direct operations, PHE Group considered the regulated nature of its Australian employment arrangements, with projects delivered primarily through a direct employment model and employees engaged under applicable enterprise agreements and modern awards. These instruments establish minimum standards for wages, working conditions, and freedom of association, and provide baseline protections that reduce the risk of coercive or exploitative labour practices within PHE Group's direct workforce.

Notwithstanding this assessment, PHE Group recognises that modern slavery risks may arise in certain areas of its operations and supply chains. In particular, the use of subcontracted services and reduced visibility over extended subcontractor and supplier supply chains may present an elevated risk. In addition, the procurement of certain goods, including imported equipment and materials, may involve upstream supply chains operating in higher-risk jurisdictions.

In forming this assessment, PHE Group considered a range of risk indicators, including:

- geographic risk data, including reference to the Global Slavery Index
- the nature of goods and services procured
- the potential involvement of vulnerable labour groups
- insights from recognised human rights and labour organisations

PHE Group's risk profile is reviewed on an ongoing basis and will be updated as operations, projects, and supply chains evolve.

Policies and Controls

PHE Group has established policies and frameworks that prohibit all forms of modern slavery and support the protection of universally recognised human rights across its operations and supply chains. These frameworks require compliance with applicable laws and regulations and promote principles of honesty, integrity, fairness, and respect in the conduct of PHE Group's business.

PHE Group has adopted a Human Rights and Anti-Modern Slavery Policy, which sets out the organisation's commitment to ethical labour practices and responsible supply chain management. The policy is informed by internationally recognised human rights standards, including the International Bill of Human Rights and the UN Guiding Principles on Business and Human Rights, and applies across PHE Group's operations and projects.

PHE Group's policies support safe and healthy working conditions and respect the rights of workers, including freedom of association and the right to collective bargaining. These commitments are embedded within the policies and procedures that govern PHE Group's day-to-day operations.

In addition to its Human Rights and Anti-Modern Slavery Policy, PHE Group maintains a range of supporting policies and procedures that reinforce ethical conduct and accountability, including:

- **Code of Conduct**, which sets expectations for ethical behaviour across all levels of the business
- **Whistleblower Policy**, which provides confidential channels for raising concerns
- **Procurement Policy**, which establishes sourcing principles that promote legal compliance and fair treatment

These policies are supported by documented procedures, internal oversight, and leadership accountability, and are reviewed periodically to ensure they remain fit for purpose and aligned with evolving regulatory and industry expectations.

Supplier Due Diligence

PHE Group's supplier assessment process considers industry risk, geographic exposure, and workforce practices. Where higher risk is identified, additional steps may be taken, including enhanced due diligence and ongoing engagement.

PHE Group's standard subcontract terms and conditions require subcontractors to represent that, to the best of their knowledge, modern slavery offences are not occurring within their organisation or supply chains, and that reasonable steps are taken to identify and prevent such risks. Subcontractors are also expected to apply similar requirements to their own suppliers where services or goods are outsourced.

PHE Group seeks to source products and services from reputable and established suppliers that meet minimum labour standards, including those relating to health and safety, working hours, wages, freedom of association, and the prohibition of forced or child labour.

Where possible, PHE Group entities purchase from approved suppliers. Where this is not practical due to supply limitations or client requirements, alternate suppliers may be subject to risk-based review, including consideration of supplier location, product type, compliance with Australian Standards, insurance cover, quality, and ethical practices.

Grievance Mechanisms

PHE Group maintains grievance and whistleblower mechanisms that allow employees, contractors, and suppliers to raise concerns relating to unacceptable working conditions, unethical behaviour, or potential modern slavery risks. Concerns may be raised directly with management, with escalation available where issues are not appropriately addressed. Reports are treated confidentially and managed in accordance with established procedures.

Assessing Effectiveness

PHE Group assesses the effectiveness of its modern slavery risk management approach through regular review of qualitative and quantitative indicators. These indicators are used to evaluate whether policies, controls, and training activities are operating as intended, and to identify areas for improvement.

Effectiveness is assessed through consideration of the following indicators:

- regular reporting from the Talent and People Operations Team regarding compliance with employee awards and conditions
- completion of modern slavery awareness training by relevant employees, alongside regular leadership training
- outcomes of supply chain due diligence processes undertaken prior to supplier engagement
- consideration of modern slavery risks as part of due diligence activities undertaken in connection with acquisitions, where applicable
- reports raised through whistleblower and grievance channels, including the nature and resolution of concerns
- outcomes of supplier audits and remediation activities, where undertaken
- monitoring of emerging risks or gaps in controls through developments in industry guidance and international best practice

These indicators are reviewed by senior management, with oversight from the Director. Findings inform updates to PHE Group's risk assessment processes, supplier engagement practices, and training approach. As the business continues to mature its response, PHE Group will progressively refine its effectiveness measures and introduce clearer benchmarks over time.

Response and Remediation

If a modern slavery incident is identified within PHE Group's operations or supply chain, the response is immediate and multi-layered: ensuring the safety of affected individuals, collaborating with relevant authorities and human rights groups, and addressing root causes. Where suppliers are unwilling to meet corrective actions, PHE Group will take decisive steps, including termination of engagement and reporting to appropriate bodies.

Consultation

During the period, PHE Group management engaged with each of the businesses covered by this Statement to ensure that they understand their obligations under the Modern Slavery Act and that they are taking appropriate steps to identify and mitigate modern slavery risk in their operations and supply chain. This consultation included representatives from across the businesses including operations, talent and people operations, procurement, contracts and commercial.

Each business has also reviewed this Statement to ensure that it accurately reflects the key modern slavery risks in their operations and supply chain and the steps taken to mitigate against these.

This Statement was reviewed by the Sole Director prior to approval.

Continuous Improvement

PHE Group is committed to continually strengthening its approach to identifying and managing modern slavery risks. Over the next reporting period, PHE Group will focus on incremental improvements to its existing frameworks and practices, including refining supplier engagement processes, enhancing risk-based due diligence where appropriate, and strengthening internal awareness of modern slavery risks.

Approval

The Sole Director has approved this Modern Slavery Statement for the reporting period of 1 July 2024 to 30 June 2025.



Mark Hogan
Director, PHE Group Trust

10/04/2026

Date