

TDG Group Modern Slavery Statement

Introduction

This Modern Slavery Statement (Statement) has been prepared pursuant to the Modern Slavery Act 2018 (Cth) (the Act) and approved by the board of TDG Group as the principal governing body of the TDG Group of Companies (TDG Group). This Statement sets out the actions taken by the TDG Group and its related entities to address modern slavery (trafficking in persons; slavery, servitude; forced marriage; forced labour; debt bondage; the worst forms of child labour; and deceptive recruiting for labour or services) risks and ensure responsible and transparent practices within its business and supply chains.

This statement encompasses all entities within TDG Group Pty Ltd (“the Reporting Entity”):

- Total Drain Group Pty Ltd ACN 621 479 981
 - Total Drain Cleaning Services Pty Ltd ACN 130 467 346
 - Mainstream Recycling Pty Ltd ACN 611 996 493
 - Enviro Vac Technology Pty Ltd ACN 156 485 031
 - Environmental Services Group Pty Ltd ACN 145 149 971
 - Gavlex Pty Ltd ACN 053 704 466
 - Utility Track Pty Ltd ACN 617 835 622
 - DJSB Holding Pty Ltd ACN 165 666 204
 - Bartlett’s Waste Management Pty Ltd ACN 007 245 696
 - Bartlett Asset Management Pty Ltd ACN 109 779 624
 - Bulk Materials Group Pty Ltd ACN 619 336 293
 - BMG Assets Pty Ltd ACN 620 055 218
 - Spark Bidco NZ Ltd NZBN 942 905 053 0380
 - Hydrotech Investments Limited NZBN 3769340
 - Hydrotech Limited NZBN 1197079
 - Reline NZ Limited NZBN 3943299
 - Hydrotech Hire Limited NZBN 2199652
 - Drain Surgeons NZ Limited NZBN 5341841
 - Drain Surgeons Limited NZBN 5418641
 - Environmental Recovery Solutions Limited NZBN 6492192

STRUCTURE, OPERATIONS AND SUPPLY CHAIN

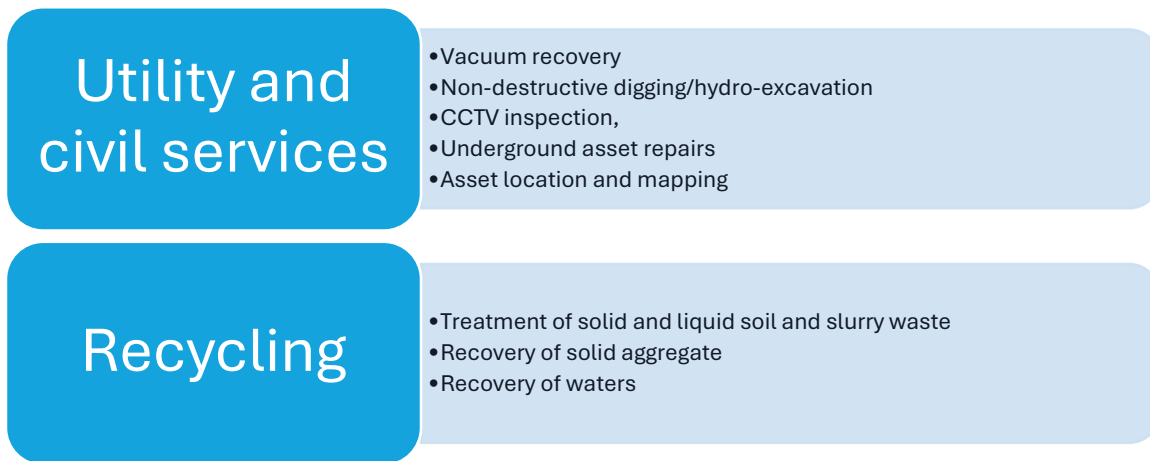
Structure

TDG Group is structured with following core operating entities:

- TDG Environmental Pty Ltd is the primary services delivery business operating in Australia and New Zealand, primarily with TDG-owned assets and employees providing utility and civil services generally, specifically including vacuum recovery, non-destructive digging/hydro-excavation, CCTV inspection, underground asset repairs, asset location and mapping plus ancillary services.
- Mainstream Recycling Pty Ltd operates licensed waste recycling facilities treating solid and liquid soil and slurry waste.

Operations

TDG Group operate within Australia and New Zealand providing the following range of services:



Supply Chain

The TDG Group supply chain is primarily encompassed onshore in Australia and New Zealand with limited use of off-shore procurement. It engages with approximately 957 suppliers, with 98% of the supply chain being low-risk providers of services and products based in Australia and New Zealand.

Supply Chain	Direct Domestic 90%	Direct Foreign 10%	Secondary*
Low Risk Exposed	Vendors 88%	Vendors 10%	Estimated 20% of direct domestic being imported by partners
Risk Exposed Services/Product	Vendors 2% primarily IT services	Vendors Nil	Estimated 40% of the risk exposed services being outsourced
Risk Exposed Locations	NA	Precluded [#]	Precluded [#]
Risk Exposed Entities	Precluded [#]	Precluded [#]	Precluded [#]

Legend:

- **Direct** supply chain partners with whom the TDG Group directly engage and interact on a business-to-business basis.
- **Secondary** supply chain partners, whom our direct partners engage, are estimated to represent.
- **Low-Risk Exposed** products, services, locations and entities with no or low potential for modern slavery. Primarily domestic providers of goods and services
- **Risk Exposed Services** with higher-than-normal potential for risk, ie cleaning, hospitality, agriculture. (Potentially includes Cleaning, Contractors & Temps, Computer Software Maintenance, Software Licenses, Software Development).

- **Risk Exposed Products** with higher-than-normal potential for risk, ie rubber products, bricks and construction materials, minerals, cocoa and tea, textiles production and some types of manufacturing. (Potentially includes Safety Equipment & Uniforms, Consumables, Computer Hardware Maintenance, Computer Peripherals, Office Supplies & Consumables)
- **Risk Exposed Locations** countries higher than normal potential for risk, inclusive of: North Korea, Eritrea, Mauritania, Saudi Arabia, Turkey, Tajikistan, the United Arab Emirates, Russia, Afghanistan and Kuwait. This may include exposure of vulnerable minorities ie Uyghurs etc
- **Risk Exposed Entities:** Entities with known or suspected modern slavery if identified.

% as percentage of total spend last twelve months

Modern Slavery Risks

Given the current nature and scope of current operations, the risk that they are causing, contributing, or directly linked to modern slavery practices is low, and the controls in place are effective in maintaining an acceptable level of risk.

Assessing the potential risk of modern slavery in supply chains, including geographic risks, products and services sourced, operating sectors, and the supply chain model involved necessary actions to address areas of vulnerability have been taken.

Risk Categories	Direct Domestic	Direct Foreign	Secondary
Low Risk Exposed	Low	Low	Medium
Risk Exposed Services	Medium	High	High
Risk Exposed Products	Medium	High	High
Risk Exposed Locations	NA	Very High	Very High
Risk Exposed Entities	Very High	Very High	Very High

Anti-Slavery Actions, Practices and Due Diligence

Recognising the level of risk within our supply chain, the following actions have been taken to ensure effective prevention of slavery and effective due diligence:

- **Policy and Process** – TDG Group has defined internal control systems through our policies and processes. Specifically, we will not engage or transact with suppliers in the very high risk categories.
- **Training and Awareness** – Persons with procurement responsibilities in High or Very High procurement categories have completed Modern Slavery Awareness and Procurement training. Persons with general procurement in the Low-Medium range have been educated regarding Modern Slavery via the Anti-Slavery policy.
- **Procurement Control** – All High-Risk categories are centrally controlled and restricted to procurement by designated persons who have completed the required training. All High-Risk procurement is accompanied by a risk assessment and due diligence during the procurement process.
- **Recruitment/Employer Control** – All employment practices and labour hire practices are conducted in accordance with Australian and New Zealand employment law and relevant Labour Hire practices as guided by our Human Resources policies.
- **Contractors & Direct Suppliers** – All preferred suppliers and sub-contractors are required to commit to Modern Slavery compliance in accordance with the Act.

- **Secondary Suppliers** – Preferred suppliers are required to commit to Modern Slavery due diligence in their management and control of Secondary Suppliers.
- **Whistleblower Reporting** – Any activity causing, contributing, or directly linked to modern slavery practices may be reported via the Whistleblower reporting procedure in accordance with the Whistleblower policy:
 - Telephone disclosure 1300 330 294
 - Written disclosure TDG Group Attention of the Group GM Legal & Executive Management 104 Agar Drive Truganina Vic 3029
 - Email disclosure cfeil@tdg.com.au
- **Remediation** – In the event that an incident of modern slavery is demonstrated or suspect then TDG Group will take immediate action to prevent further harm, to report and cooperate with authorities and to take all reasonable action to rectify any impact to those immediately impacted.

Consultation

This statement was prepared under the leadership of TDG Group management following direct consultation with:

- Managers of all incorporated entities
- Engagement with employees and staff of operating entities
- Direct engagement and due diligence with principal suppliers

Effectiveness of Controls and Actions

TDG Group maintains an ongoing assessment of our Modern Slavery controls, informed by reported issues/concerns, benchmarking and auditing reviews with our customers, consultation and engagement with our suppliers.

The controls have thus far remained effective and sustained our appetite for an overall low risk of modern slavery within our activities and supply chain.

No incidents or suspicions of modern slavery concerns have been reported since the last statement. Any reports are investigated and reported in accordance with the Incident and Issue Resolution Procedure.

Principal Governing Body Approval

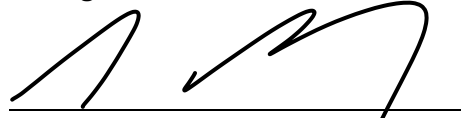
The Board has consulted with our owners and top management of the organisation to ensure that all parties are informed, committed and engaged to ensuring an effective framework of anti-slavery controls.

This modern slavery statement was approved by the principal governing body of TDG Group Pty Ltd as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) on 27 November 2024

Signature of Responsible Member

This modern slavery statement is signed by a responsible member of TDG Group Pty Ltd Board as defined by the Act.

Signature of Director:



Name Jochen Fredrich Behr

Date: 12 December 2024