



# Modern Slavery Statement

2025

**ventia** 

## About this Statement

This Statement is provided by Ventia Services Group Limited ABN 53 603 253 541 (Ventia) under the Australian Modern Slavery Act 2018 (Cth) (the Act) for the period of 1 January 2025 to 31 December 2025 (referred to as the reporting period for 2025).

This is a joint Statement which applies to all Ventia reporting entities within the scope of the Act, as identified in Appendix A (collectively referred to in the Statement as Ventia, we/our).

This Statement was approved by the Ventia Board of Directors (the Board) as the ultimate parent entity of the Ventia Group (the Group) on 20 May 2026.

## Forward Looking Statements

This Statement contains forward-looking statements in relation to Ventia Services Group Limited and its controlled entities (Ventia). These statements express Ventia's current views regarding future events and circumstances, including its intentions, strategies, priorities, plans and expectations, based on information available at the time this Statement was prepared. Forward-looking statements may be identified by words such as "*forecast*", "*estimate*", "*plan*", "*will*", "*anticipate*", "*may*", "*believe*", "*should*", "*expect*", "*intend*", "*outlook*", "*aim*" or similar expressions.

Forward-looking statements are subject to risks and uncertainties, many of which are outside Ventia's control, and actual outcomes may differ materially from those expressed or implied. Readers are cautioned not to place undue reliance on these statements. Except as required by law, Ventia does not undertake to update any forward-looking statements.



## Acknowledgement of Country

Ventia would like to respectfully acknowledge the Traditional Custodians of country throughout Australia and their connection to land, sea and community. We pay our respect to them, their cultures and to their Elders past and present.



## Mihi

He tautoko te ahurea i ngā kawa me ngā tikanga o ngā Iwi whānui o Aotearoa, me ka kawa me ka tikaka o ka Iwi whānui o Te Waipounamu. We recognise and celebrate the culture of manawhenua in Aotearoa and Te Waipounamu where our teams respect local Iwi and communities across the country.

## Reporting Concerns

If you have concerns relating to modern slavery or broader human rights issues within our operations or supply chain, we encourage you to raise these concerns through our established reporting channels.

Further information is available on our website: [www.ventia.com/who-we-are/code-of-conduct](https://www.ventia.com/who-we-are/code-of-conduct)

You can also contact our independent whistleblower hotline on:

Phone: 1800 500 965 (Australia) 0800 100 526 (New Zealand)

Web: [www.kpmgfaircall.kpmg.com.au/Ventia](https://www.kpmgfaircall.kpmg.com.au/Ventia)

Email: [FairCall@kpmg.com.au](mailto:FairCall@kpmg.com.au)

Post: FairCall Manager, KPMG Forensic, PO Box H67, Australia Square, Sydney NSW 1213

Fax: +61 2 9335 7466

**We are Ventia**  
People are at  
the heart of  
our success.

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# 1. Managing Director and Group Chief Executive Officer Statement

As we reflect on 2025 as a year of solid progress for Ventia, our success remains inseparable from our responsibility to respect the rights, dignity and wellbeing of the people who support our operations. Our employees, customers, supply partners and the many workers across our extended supply chain play a critical role in delivering essential services to communities across Australia and New Zealand. Protecting human rights across our value chain is fundamental to how we operate.

In this Modern Slavery Statement, we outline the actions taken over the past year to uphold this responsibility. We have continued to work collaboratively with supply partners, customers and industry peers to strengthen the identification and management of modern slavery risks, enhance our policies and processes, and build capability across our teams. We recognise that a culture of fairness, inclusion and respect is essential to an effective modern slavery response, and we remain committed to taking proactive steps to prevent and address modern slavery risks and to operate a business that respects and protects human rights.

Our assessments have not identified any confirmed modern slavery practices within our operations or supply chains during 2025 relevant to this Statement. We acknowledge that this outcome, does not, of itself prove the absence of modern slavery risk, particularly given that we operate and procure goods and services from regions where such risks are known to exist. We therefore continue to monitor, assess and investigate any emerging issues, and remain focused on continuously strengthening our approach to protecting human rights across our operation and supply chain.



**Dean Banks**  
Managing Director  
and Group CEO

## 2. Our Organisation

### Who We Are

Ventia is one of the largest essential services providers in Australia and New Zealand. We specialise in the long-term operation, maintenance and management of critical public and private assets and infrastructure across a broad range of industry segments. We are a public company listed on the Australian Securities Exchange (ASX: VNT) with a secondary listing on the New Zealand Exchange. We are headquartered in Sydney, New South Wales. Our diverse heritage and strong track record reflect our commitment to service excellence and positive community impact.

### Our Key FY25 Activities

**98.1%**

completion of the Code of Conduct training by permanent full-time employees



Established cross-functional Modern Slavery Working Group



Standalone Human Rights & Modern Slavery Policy implemented

Our Structure and Operations

This is a joint Statement, which applies to all Ventia reporting entities within the scope of the Act, as identified in Appendix A (collectively referred to in the Statement as Ventia, we or our).

Ventia’s operations are structured across four sectors: Defence and Social Infrastructure, Infrastructure Services, Telecommunications and Transport, each comprising several business units, largely aligned with the industry segments we serve. Each Ventia sector is supported by Group functions, including Innovation & Transformation (including Group Supply Chain), Strategy & Corporate Affairs, People Safety & Sustainability, Finance, Legal and Commercial.



Defence and Social Infrastructure

Defence / Social Infrastructure (education, health and state government)/ Housing and Community (justice and social housing) / Local Government and Critical Infrastructure



Telecommunications

Fixed Networks / Operations and Services / Wireless



Infrastructure Services

Energy and Renewables / Water / Resources



Transport

Transport Operations Australia / Transport Infrastructure Solutions / Transport New Zealand

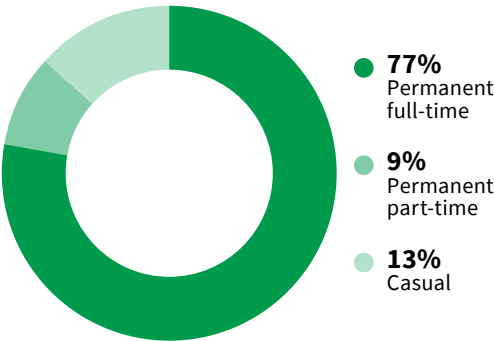
Our People<sup>1</sup>

People are the heart of our success - we have a workforce of 14,689 plus subcontractors, operating across more than 400 sites throughout Australia and New Zealand.

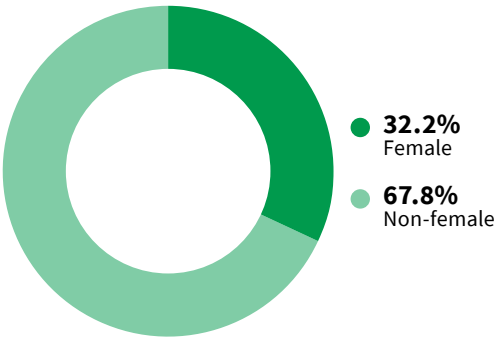
14,689

Employees

Employees by contract type



Our employees identify as



990

temporary workers on average each calendar month

3.3%

employees that identify as Aboriginal and Torres Strait Islander in Australia

9,147

employees covered by Enterprise and Collective agreements approved in Australia and New Zealand

Our workforce includes employees as well as supply partners to support service delivery to customers. These arrangements form a significant component of our labour supply chain and represent key focus in our modern slavery risk assessment and due diligence process. Further details regarding our workforce composition are available in our [2025 Sustainability Databook](#).

1. All people data in this statement, is as at 31 December 2025.

Our Supply Chain

Ventia operates a diverse supply chain, engaging approximately 12,500 direct supply partners that support our operations across Australia and New Zealand. Our supply partners (incorporating subcontractors and suppliers of goods, services and labour) are key stakeholders in addressing modern slavery risks, and we work collaboratively with them to communicate our expectations and support effective risk identification and management. Procurement activities are governed through Ventia’s central Group Supply Chain function.

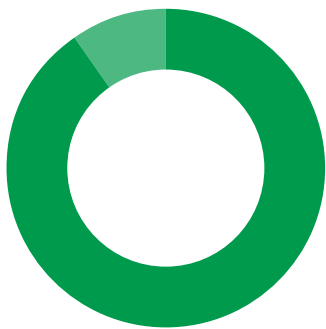
During 2025, we procured over 99% of goods and services from Tier 1 (direct) supply partners based in Australia and New Zealand, continuing the trend observed in previous years and in line with our commitment to buy from local supply partners.

In 2025, Ventia directly imported only a very small proportion of goods and services from overseas, primarily from OECD-defined low-risk countries across North America and the Asia-Pacific region.

Ventia’s procurement spend with our direct supply partners totalled approximately AUD \$4.1 billion during 2025. Our supply chains include a range of local, Indigenous and social enterprises across Australia and New Zealand.

Individual projects procure some goods and services directly to meet their operational requirements, particularly where geographical supply constraints exist. During the 2025 reporting period, Ventia maintained oversight to ensure that all its procurement activities were conducted in accordance with the Group’s Procurement Policy which was refreshed in 2025.

Spend in Australia and New Zealand (2025)



● Australia 90.3%  
● New Zealand 9.7%

Number of Ventia suppliers located in Australia and New Zealand (2025)



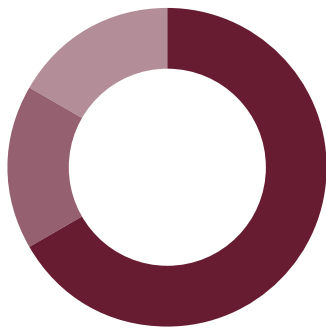
● Australia 10,083  
● New Zealand 2,396

Supply chain spend across Ventia sectors (2025)



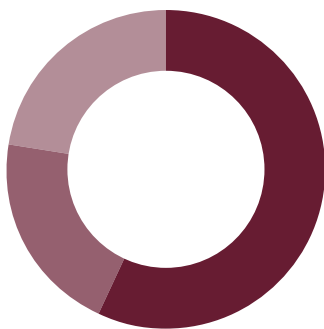
● Corporate services 9%  
● Defence & Social Infrastructure 41%  
● Infrastructure services 13%  
● Telecommunications 27%  
● Transport 10%

Spend in other regions (2025) (approx 0.6%)



● North America (0.4%)  
● Asia Pacific exc. AU & NZ (0.1%)  
● Europe (0.1%)

Number of suppliers located in other regions (2025)



● North America 69  
● Asia Pacific exc. AU & NZ 25  
● Europe 27

### 3. Modern Slavery Risks

Ventia operates across a broad range of essential infrastructure services within a complex and evolving operating environment. The nature and extent of modern slavery risk within our operations and supply chains may therefore change over time in response to internal and external factors. These may include economic conditions, labour market dynamics, geopolitical developments, conflict or instability, and environmental impacts such as climate-related events and natural disasters.

Changes to our operations, the commencement of new projects or services, and the integration of new businesses or supply partners may also influence our risk profile. In recognition of this, Ventia maintains a continuous and risk-based approach to identifying, assessing and addressing modern slavery risks as our business and operating context continue to evolve.

During 2025, Ventia did not identify any material changes to our operations or supply chain activities that resulted in an increased risk of modern slavery. We continue to implement and monitor a range of controls to manage and mitigate these risks, as outlined in this Statement.

#### Overview of Risk Assessment Approach

Consistent with the United Nations Guiding Principles on Business and Human Rights, Ventia assesses the risk of causing, contributing to, or being directly linked to modern slavery as an integral component of its Risk Management Framework.

In 2025, Ventia undertook a targeted forced labour supply chain risk evaluation, assessing all directly engaged supply partners using our established risk assessment tool. The tool incorporates internationally recognised risk indicators, with specific consideration given to sector and industry characteristics, the nature of products and services, geographic exposure, and entity-level risk factors. As part of this annual assessment, Ventia also considered the degree of commercial leverage held with supply partners when identifying modern slavery risks and opportunities to influence positive outcomes.

Supply partners identified with elevated risk were then approached to participate in our targeted modern slavery due diligence process, the responses we received will inform our continuous improvement throughout 2026.

Our standard supply partner and subcontractor agreements include obligations highlighting our management of modern slavery risks and associated legal and governance obligations.

The remediation of modern slavery risks in our supply chains is conducted in line with our established grievance, investigation and compliance process, with actions determined based on verified investigation outcomes. Remediation may include engagement with supply partners and subcontractors to implement corrective actions and prevent recurrence, with escalation to contractual remedies, including termination of the business relationship, where issues cannot be effectively addressed.

#### Leveraging International Validators

We continued to utilise the Global Slavery Index (GSI) as the main pillar of our risk assessment for inherent geographical risk, using 2023 data published by the GSI through the Walk Free Foundation in our most recent modern slavery supply chain risk assessment.

The GSI ranks 182 countries based on the number of victims of modern slavery per 1,000 inhabitants. It also provides an analysis of the actions taken by governments of the ranked countries to respond and the factors that make people vulnerable to modern slavery.

We also utilise the United States Department of Labor's List of Goods Produced by Child or Forced Labor, which details goods for which there is reason to believe are being produced by child labour or forced labour in violation of international standards, as required under the United States Trafficking Victims Protection Reauthorization Act (TVPA). The list comprises 169 goods from 80 countries, as published in September 2024.

#### Geographic Location of Origin for Products and Services

The geographic location of the production and provision of goods or services procured by Ventia continued to be a key consideration in our due diligence process to determine associated risks within the supplier workforce, such as skill level, unionisation rates and remuneration.

Risks in Our Supply Chains

We assess modern slavery risks across our operations and supply chains by considering both geographic exposure and the nature of the products and services procured. Building on this, we apply a category-based approach to supply chain risk management, enabling us to identify areas where inherent risk is more likely to arise and to prioritise our focus accordingly.

During 2025, we continued to refine this approach, using category insights to inform targeted supplier engagement and to identify opportunities to leverage our purchasing power to drive improved risk management practices and greater transparency across our supply chain.

Our modern slavery risk assessment for the 2025 reporting period identified that risks were most prominent in low-value procurement categories. The identified most material areas of vulnerability in Ventia’s operations include:

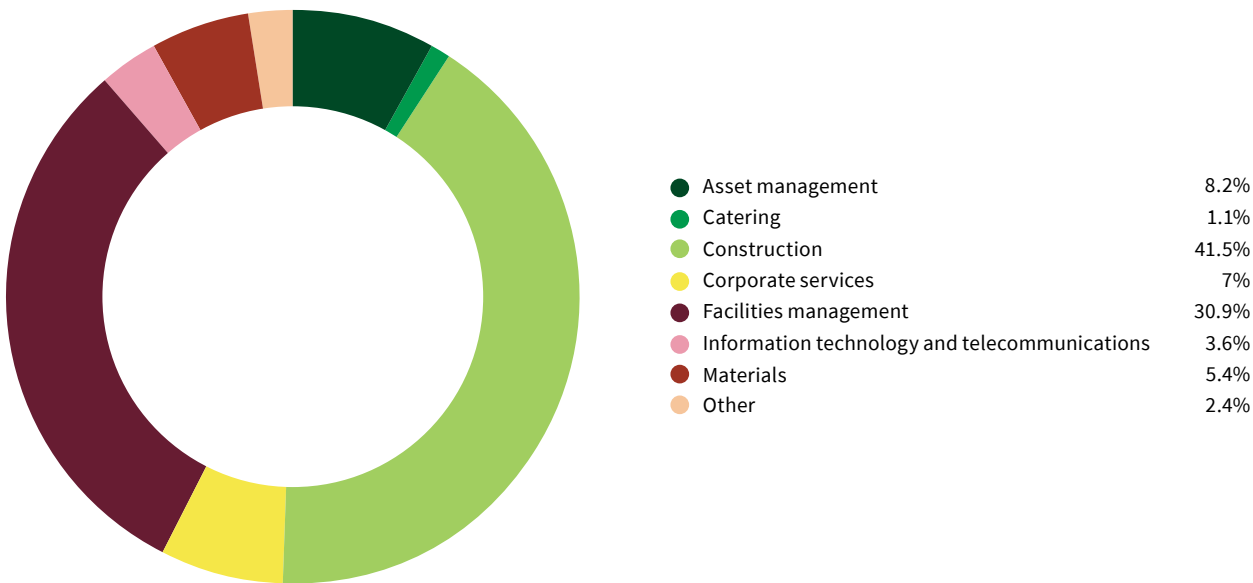
- personal protective equipment (PPE) and workwear
- promotional items
- cleaning services and equipment
- fresh fruit, vegetables and seafood; and
- technology services and equipment.

We focused on these categories in our supplier engagement and risk mitigation activities during 2025 to address the risk of Ventia causing, contributing to, or being directly linked to modern slavery practices in our supply chains. These elevated risk categories are largely incorporated within our broader procurement categories of catering, corporate services, facilities management and construction.

We assess sustainability risks including the human rights/modern slavery exposure of relevant supply partners as part of selection and contract renewal processes. Where supply partners are unable to satisfy Ventia that they have appropriate risk management controls in place or if they are unwilling to share this information, we engage with the supply partner to implement a remediation plan or may suspend their contract implementing a remediation plan or suspending their contract.

Specific supply chain conditions related to the nature of the workforce involved in the delivery of goods or services procured, inherent geography-based modern slavery risks and the risk materiality of the commodity being procured, are factors we use in our modern slavery risk management and assessment. Based on the location and services provided by the supply partners of the above products and services, the risk of modern slavery for these categories has been assessed as low to medium. For the 2025 reporting period, we identified 130 supply partners for further engagement in line with our modern slavery Risk Management Framework, covering approximately 3-4% of our annual spend.

Spend across main supplier categories (2025)



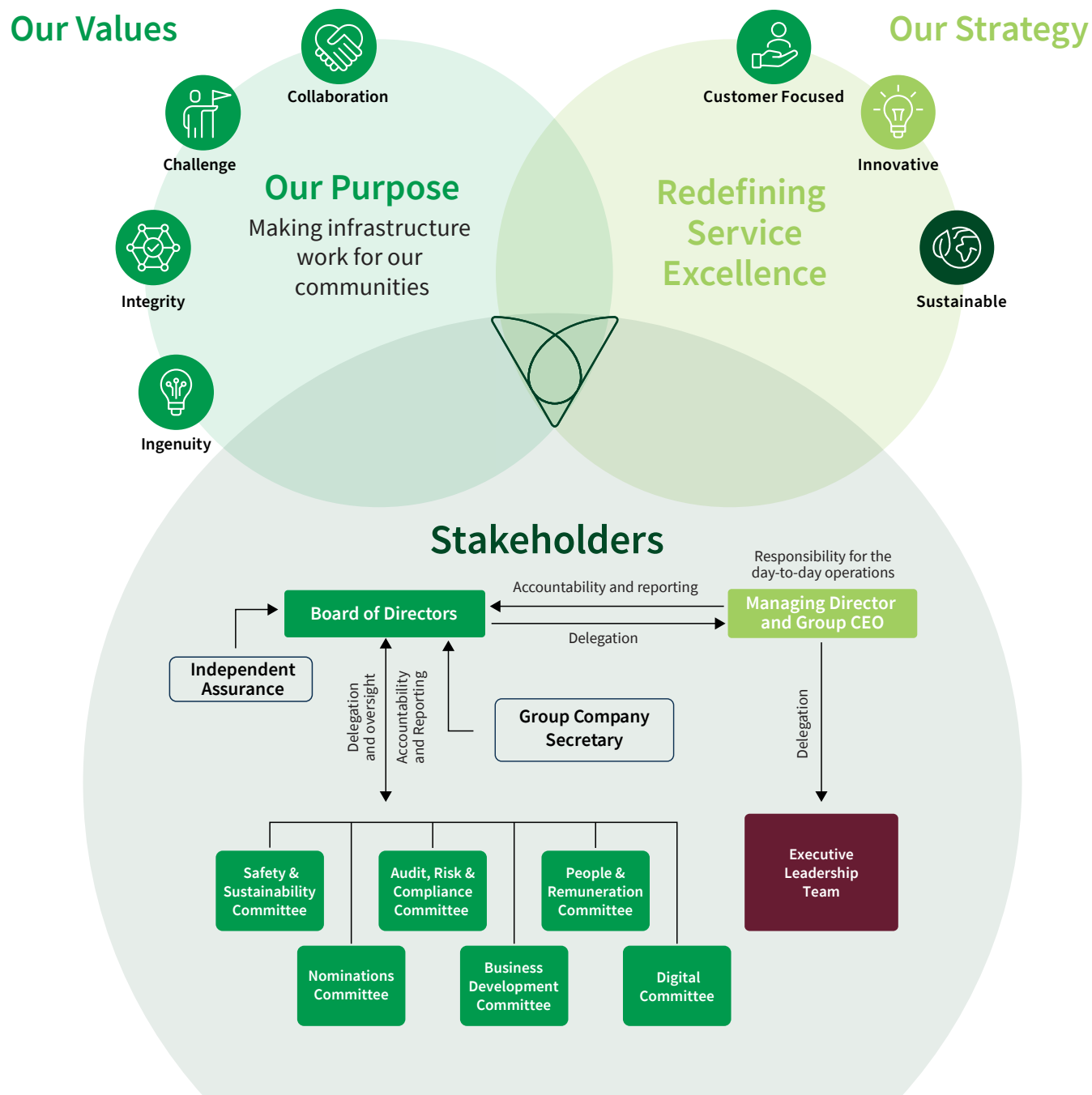
## 4. Actions to Address Risks

### Corporate Governance

Ventia's governance framework supports our people in delivering on our commitments and underpins effective, responsible decision-making for shareholders, employees, supply partners, governments, regulators and the communities in which we operate.

Consideration of modern slavery risks is integrated within Ventia's broader governance framework to improve alignment, transparency and accountability across all levels of the organisation.

### Ventia's governance framework



## Key Components of Our Governance Framework

Our modern slavery response is embedded within Ventia's broader governance framework. The table below outlines the key governance bodies and their role in supporting this response.

| Board                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The Board provides oversight of corporate governance for Ventia and its controlled entities (Group). This includes approving our key policies and Modern Slavery Statement. The Board's oversight of corporate governance and risk management is supported by the Committees.                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Committees                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Safety &amp; Sustainability Committee (SASC)</b><br>Oversees workplace safety, health, environment and sustainability (including modern slavery) matters.<br>Responsibilities: <ul style="list-style-type: none"> <li>reviewing and recommending to the Board the Group's Modern Slavery Statement annually</li> <li>overseeing processes to identify, manage and report risks including modern slavery risks across the Group</li> <li>monitoring the effectiveness of controls, policies and internal governance including modern slavery risks</li> <li>monitoring emerging regulation and material risks including those relating to modern slavery, in conjunction with relevant Board committees</li> </ul> The SASC met four times in 2025. | <b>Audit, Risk &amp; Compliance Committee (ARCC)</b><br>Oversees corporate governance, financial reporting, internal control structure, risk management systems, internal and external audit functions, and compliance with all applicable laws and regulations.<br>Responsibilities: <ul style="list-style-type: none"> <li>overseeing policies, systems and controls relating to human rights and modern slavery across operations and the supply chain</li> <li>overseeing Regulatory, Compliance, &amp; Ethics Reporting (including whistleblowing)</li> <li>monitoring emerging regulation and material risks including those relating to modern slavery, in conjunction with relevant Board committees</li> </ul> The ARCC met four times in 2025. | <b>People &amp; Remuneration Committee (PRC)</b><br>Assists the Board in the effective discharge of its responsibilities for people and remuneration matters.<br>Responsibilities: <ul style="list-style-type: none"> <li>overseeing the Group's Remuneration Framework</li> <li>monitoring whistleblower reports insofar as they relate to people and remuneration matters and escalates matters to the Board as required</li> <li>monitoring emerging regulation and material risks including those relating to modern slavery, in conjunction with relevant Board committees</li> </ul> The PRC met five times in 2025. |

| Managing Director and Group CEO                                                                                                                                            |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Manages Ventia in accordance with the strategy, business plans and policies approved by the Board including ensuring resourcing for the governance and management of risk. |

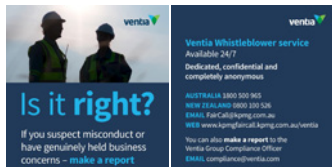
| Executive Leadership Team                                                                                                                                                                                                                                                                                      |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The Executive Leadership Team (ELT) is responsible for implementing key policies and strategic objectives in relation to Human Rights and Modern Slavery and promoting responsible & ethical behaviour across operations. The ELT plays an important role in embedding a culture aligned with Ventia's values. |

| Modern Slavery Working Group                                                                                                                                                                                                                                                                                                      |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The Modern Slavery Cross-Functional Working Group was initiated in 2025 and comprises team members from different areas in the business with key touchpoints to modern slavery risk. It is accountable for supporting modern slavery risk assessment across our operations and setting our annual assessment plan and priorities. |

## Policies & Standards

Underpinning our Corporate Governance Framework are Ventia's policies and standards, several of which are relevant to managing modern slavery risk. These include our Code of Conduct, Human Rights and Modern Slavery Policy and Whistleblower Protection Policy.

The table below outlines the key policies and standards within our governance framework and shows how they relate to modern slavery, including our approach to implementation.

| Relevance to modern slavery                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | How we implement this policy                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Human Rights and Modern Slavery Policy</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <ul style="list-style-type: none"> <li>Sets out Ventia's commitment to upholding the highest standards of human rights, actively combating modern slavery in all its forms, and ensuring ethical practices throughout our operations and supply chains.</li> <li>Confirms Ventia's obligation to operate in compliance with all applicable laws and regulations, including those related to human rights and modern slavery, in every jurisdiction in which we work.</li> <li>Reflects Ventia's alignment with recognised international and domestic human rights standards that guide and inform our approach.</li> </ul>                                                                       | <ul style="list-style-type: none"> <li>The Human Rights and Modern Slavery Policy was updated in 2025 (a refresh of Ventia's previous Modern Slavery Policy) and is publicly available on the Ventia website and communicated on internal platforms.</li> <li>The policy is implemented through Ventia's mandatory new supplier onboarding process, where all new suppliers are required to acknowledge their understanding of the policy as part of the onboarding form prior to engagement.</li> <li>The Policy is required to be reviewed every two years and will be reviewed in 2027.</li> </ul>                                                                                 |
| <b>Code of Conduct</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <ul style="list-style-type: none"> <li>Affirms Ventia's commitment to respecting and upholding human rights in business.</li> <li>Requires the following from Ventia people: <ul style="list-style-type: none"> <li>Implement and integrate business practices that support human rights using our risk and compliance programs.</li> <li>Report any or suspected human rights violations including modern slavery or exploitation of workers to the Group Compliance Officer or Whistleblower Hotline.</li> </ul> </li> </ul>                                                                                                                                                                   | <ul style="list-style-type: none"> <li>The Code of Conduct is part of Ventia's Annual Compliance Training materials for Ventia people and is made available in multiple languages. In-person training is provided where access to computers may be a challenge.</li> <li>The Code of Conduct is communicated to supply partners via our Supplier Handbook.</li> <li>The Audit, Risk and Compliance Committee is informed of any material breaches of the Code (such as those which may indicate a potential instance of modern slavery).</li> <li>The Code is reviewed periodically to ensure it continues to address any emerging conduct or legal and compliance issues.</li> </ul> |
| <b>Whistleblower Policy</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <ul style="list-style-type: none"> <li>The Whistleblower Policy encourages the reporting of Business Concerns including conduct associated with human rights and modern slavery.</li> <li>Sets out the various ways concerns or grievances can be raised at Ventia and confirms that reports can be made via phone or email and can be made anonymously and inside or outside of business hours.</li> <li>Confirms that KPMG FairCall (a service available 24 hours a day 7 days a week) has been engaged by Ventia to provide external third-party whistleblower services).</li> <li>Specifies that the Board will be informed of any material incidents reported under this Policy.</li> </ul> | <ul style="list-style-type: none"> <li>The Whistleblower Policy is publicly available on the Ventia website and published on internal communication channels.</li> <li>The policy is implemented through Ventia's mandatory new supplier onboarding process, where all new suppliers are required to acknowledge their understanding of the policy as part of the onboarding form prior to engagement.</li> <li>The Policy is required to be reviewed every two years and will be reviewed in 2027.</li> <li>Posters are displayed at our sites to promote this Policy to site Personnel. The below image is published to digital screens across our corporate offices.</li> </ul>    |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Ethics and Compliance Investigation Standard</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <ul style="list-style-type: none"> <li>Provides a formal mechanism to investigate allegations of ethical violations, which can include modern slavery practices.</li> <li>Outlines the process for identifying, reporting, and addressing potential ethical and compliance issues in alignment with legal and regulatory requirements and organisational policies.</li> <li>The statement is required to be reviewed every three years.</li> </ul>                                                                                                                                                                                                                                               | <ul style="list-style-type: none"> <li>The Ethics and Compliance Investigation Standard is published on internal communication channels.</li> <li>The Standard is applied during the investigation and remediation process of alleged incidents.</li> <li>The operation of this Standard is overseen by the Group Compliance Officer. If an alleged incident meets the threshold for escalation, incidents and learnings are communicated to the Group General Counsel and the Board Audit Risk and Compliance Committee.</li> <li>The Standard is required to be reviewed every three years.</li> </ul>                                                                              |

## 4. ACTIONS TO ADDRESS RISKS

Ventia maintains a range of other policies and standards that support ethical and lawful conduct in line with our values. They are designed and implemented to safeguard the human rights of our employees, contractors, supply partners, customers and the communities in which Ventia operates, including our:

- Privacy Policy
- Procurement Policy
- Anti-Bribery and Corruption Policy
- Health and Safety Policy
- Disclosure Policy
- Securities Dealing Policy
- Fairness, Inclusion and Respect Policy
- Sustainability Policy
- Buying Standard
- Bullying and Harassment Standard
- Business Partners Standard
- EEO and the Prevention of Discrimination Standard

We periodically review the effectiveness of our policies, standards and processes to ensure they align with all legal and operational initiatives or obligations, including the requirements of the Act where applicable.

## Continuous Improvement

During the reporting period, a review of the Modern Slavery Policy identified opportunities to strengthen Ventia's approach by embedding broader human rights principles across operations and the supply chain.

The review was informed by Environmental, Social and Governance (ESG) ratings insights, peer and customer benchmarking, internal consultation and alignment with Ventia's Value Creation Model and material ESG topics. As a result, Ventia adopted an updated Human Rights and Modern Slavery Policy with an expanded, principles-based scope aligned to international human rights frameworks. This integrated approach reinforces our commitment to continuous improvement in identifying, preventing and addressing modern slavery and related human rights risks.

### CASE STUDY

## Responding to Allegations of Labour Rights Violation

During the reporting period, Ventia received an anonymous allegation through an established whistleblower channel concerning potential labour rights issues involving workers engaged through a subcontracting arrangement on a Ventia project. The allegations referenced possible wage withholding, and other exploitative labour practices affecting workers engaged by a lower-tier subcontractor.

Consistent with Ventia's governance framework and internal escalation process, Ventia referred the allegations to the primary subcontractor through which the lower-tier subcontractor was engaged and required that the matters raised be investigated promptly. Ventia also sought information regarding the relevant subcontracting arrangements and confirmation of the primary subcontractor's processes, controls and practices for managing labour rights and modern slavery risks within its supply chain.

Ventia exercised its contractual and commercial rights to require the provision of investigation materials and supporting information relevant to the allegations. Ventia reviewed the information provided, identified deficiencies in the completeness and quality of the material supplied, and directed further inquiries and remedial actions where appropriate.

The response included an internal review by Ventia of information provided by the primary subcontractor, including interim and subsequent investigation reports, payroll-related information and other supporting records. In circumstances where the information provided did not sufficiently substantiate the investigation outcomes or resolve issues identified, Ventia sought additional information and considered further verification measures, including the potential need for more detailed financial or forensic review.

Based on the information available to Ventia at the time, the allegations were not substantiated to a level that enabled Ventia to make a conclusive finding that modern slavery had occurred. However, Ventia escalated the matter to the relevant New Zealand authorities in accordance with Ventia's remediation approach in the abundance of caution, noting that this inquiry was subsequently closed without substantive findings.

Ventia continued to engage with the primary subcontractor regarding secondary remediation measures, including actions directed at strengthening worker welfare protections, improving subcontracting and oversight practices, and enhancing verification of compliance.

## Strengthening Visa Compliance and Worker Protections

Migrant workers may face heightened vulnerability where their employment is tied to visa conditions. To mitigate this risk, Ventia complies with the *Migration Amendment Act 2024* in Australia and the *Worker Protection Act* in New Zealand, supported by robust visa-compliance and people-governance controls.

During the 2025 reporting period, Ventia enhanced its visa compliance framework to strengthen oversight, ensure regulatory compliance, and reduce the risk of harm to visa-dependent employees. Improvements included efficiencies in weekly sponsorship audits to confirm employees remain engaged in approved roles and are remunerated in accordance with visa conditions.

Processes for managing visa expiry and working rights changes were also strengthened through clearer end-to-end workflows, improved employee communication, standardised correspondence, and defined timeframes to support employees in resolving visa matters where possible.

To address risks associated with student visa work limitations, SAP reporting was enhanced to enable more accurate monitoring of working hours and earlier identification of potential breaches. In addition, visa condition education materials were developed and shared with leaders to improve understanding of obligations and reduce the risk of inadvertent non-compliance.

These measures strengthened Ventia's ability to identify and manage visa-related risks, enhancing protections for migrant workers and reducing the potential for modern slavery related vulnerabilities.

## Training and Awareness

Employees and supply partners play an important role in identifying and mitigating modern slavery risks across our supply chain. Effective management of these risks relies on our people having an appropriate understanding of modern slavery and the governance processes that support our approach. This is achieved through training and awareness initiatives.

The table below outlines the training and awareness initiatives undertaken during 2025.

### Employee Training on the Code of Conduct

Modern Slavery training is embedded in our Code of Conduct training, which is mandatory during employee induction. It is required annual training for Ventia's directors, leaders and employees, and 98.1% of our permanent, full-time employees completed the Code of Conduct training in 2025.

### Third-Party Compliance with the Code of Conduct

Ventia's standard contracts for supplier partners (including for labour hire companies) stipulate our requirement for third parties to understand and comply with the Code. The principles of the Code of Conduct, and how to make a whistleblower report, are included in the Supplier Handbook provided to supply partners. If a third party is found to have acted in a way that is contrary to the Code, there are a range of corrective actions available, from collaboration and remediation, through to the legal capacity to terminate engagement with that third party.

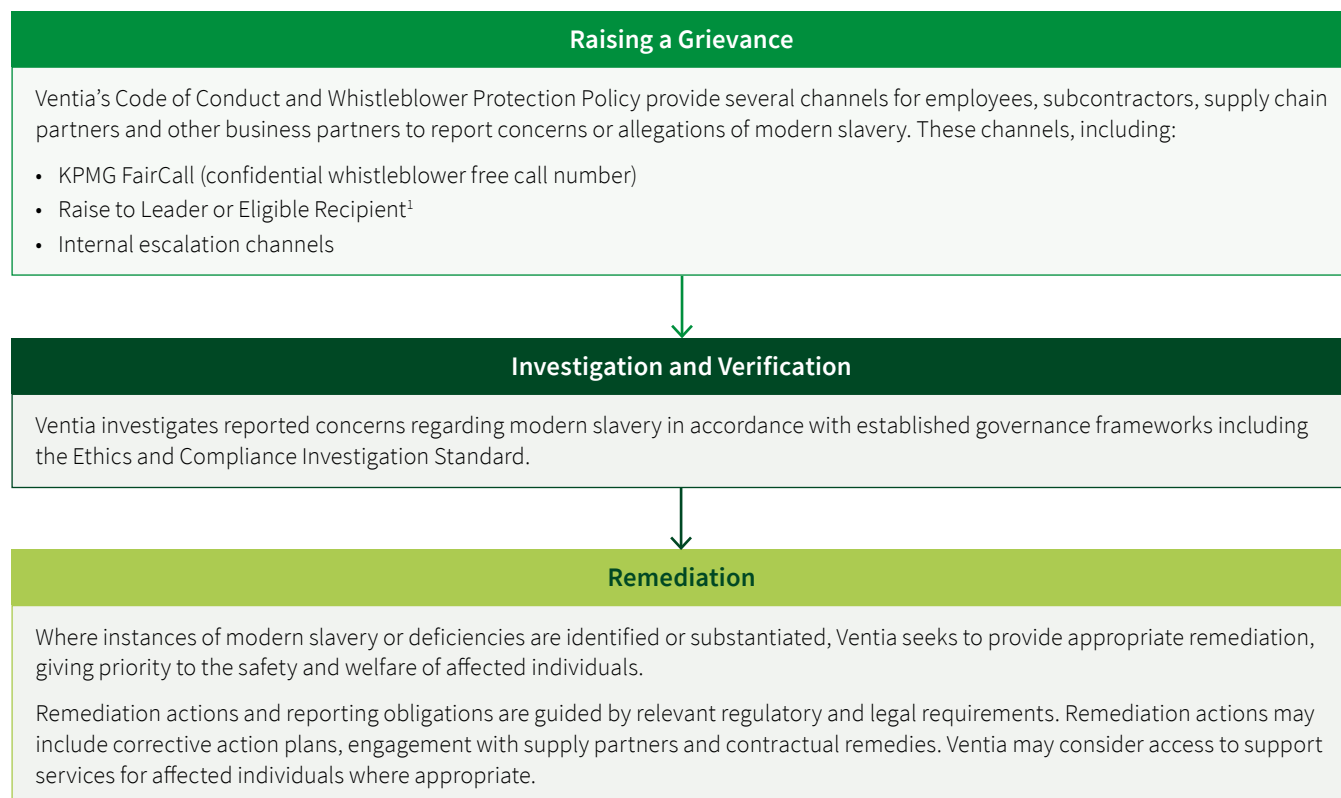
### Supply Chain Sustainability School Resources

Ventia supported the re-launch of the Supply Chain Sustainability School in Australia (the School), becoming a partner with the School in 2025 with the aim of building supply chain capability and knowledge. Through the support of its partners, the School provides free training, tools and resources on sustainability topics, including Modern Slavery.

## Grievance Mechanisms

Ventia maintains a formal grievance mechanism to support a culture of compliance, honesty, and ethical behaviour. The mechanism is underpinned by the Whistleblower Protection Policy and the Code of Conduct. It is designed to be accessible, confidential and protective of those who raise concerns. It is available to employees, former employees, subcontractors, supply partners, associates and other eligible stakeholders.

### Ventia's Modern Slavery Response



### Risk Mitigation and Due Diligence Processes

Our risk mitigation approach and due diligence process continues to evolve, using data analytics and insights from our enterprise-wide platform to support our processes. Our targeted due diligence modern slavery questionnaire is supplemented by our broad business partners due diligence process, which is applicable to all new supply partners and requires them to execute a general due diligence questionnaire.

### Due Diligence Outcomes

In line with our Human Rights and Modern Slavery Policy objectives, we conducted due diligence on our current and potential supply partners during the 2025 reporting period to understand inherent risks, that could translate into breaches of our Code of Conduct.

In line with our risk-based approach, 3% of supply partners by annual spend—comprising those identified through our risk assessment as elevated risk—were subject to targeted modern slavery due diligence in Australia and New Zealand during 2025. We will continue to collaborate with our supply partners to improve their mitigation of modern slavery risk through scaled commercial management actions.

1. Eligible Recipients are persons who can receive disclosures as outlined in Ventia's Whistleblower Protection Policy.

## 5. Assessing Effectiveness

To support monitoring of the effectiveness of our modern slavery risk management activities, Ventia has defined key indicators of effective modern slavery management. These indicators align to the elements of our modern slavery risk management process and reflect the actions and controls we have in place to identify, assess and manage modern slavery risks across our operations and supply chains.

The table below summarises Ventia's performance against these indicators during 2025:

| Element of Ventia's Modern Slavery Process | Indicator of effective management                                               | How effectiveness is measured                                            | 2025 Progress                                                                                                        |
|--------------------------------------------|---------------------------------------------------------------------------------|--------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|
| <b>Governance and Accountability</b>       | Clear responsibility for managing modern slavery risks                          | Review of governance arrangements and policy framework                   | Standalone Human Rights and Modern Slavery Policy implemented to strengthen accountability                           |
| <b>Risk assessment</b>                     | Identification of material modern slavery risks in operations and supply chains | Annual modern slavery risk assessment                                    | Tier 1 supply chain assessed, the results informed due diligence and supplier engagement priorities                  |
| <b>Supply Chain Due Diligence</b>          | Supplier risks identified and managed through engagement                        | Completion and review of supplier self-assessment questionnaires         | Targeted due diligence of supply partners with responses reviewed and follow-up actions identified <sup>1</sup>      |
| <b>Supply Chain Data Quality</b>           | Reliable data supporting risk identification and monitoring                     | Assessment of accuracy and completeness of procurement and supplier data | Continued improvements to procurement data quality and integrity and categorisation                                  |
| <b>Procurement controls</b>                | Modern slavery risks considered in procurement decisions                        | Review of procurement controls and contractual requirements              | Modern slavery requirements remain embedded within procurement processes                                             |
| <b>Workforce practices</b>                 | Compliance with workplace laws and fair employment practices                    | Internal and external payroll audits and review of employment terms      | Ongoing audits provided assurance of compliance within operations                                                    |
| <b>Grievance mechanisms</b>                | Accessible and effective channels for raising concerns                          | Review of grievance and whistleblower reports                            | Independent whistleblower service remained effective; no material issues identified                                  |
| <b>Continuous improvement</b>              | Ongoing improvement in modern slavery management practices                      | External benchmarking and review of key indicator outcomes               | Improved visibility of spend categorisation to inform risk assessments.<br>Performance indicators reset (this table) |

1. Targeted due diligence was undertaken for 65 supply partners.

## 6. Consultation Across Ventia Group

Ventia's Board holds ultimate responsibility for overseeing corporate governance across Ventia and its controlled entities. To support this, each operating reporting entity has dedicated procurement professionals who work closely with Group management. These teams play an active role in ensuring compliance with the Act, contributing to the planning, assessment, and continuous improvement of procurement activities across the organisation.

The development of this Statement involved extensive consultation with internal stakeholders, including:

- Group Sustainability
- People, Safety and Sustainability
- Group Supply Chain, including Procurement
- Legal, Risk & Compliance

These functions also form Ventia's Modern Slavery Working Group, which meets periodically to coordinate actions, monitor risks, and guide our overall approach to modern slavery governance.

A preliminary draft of this Statement was shared with all reporting entities. Along with the draft, we provided guidance on modern slavery reporting requirements and an overview of Ventia's mitigation efforts. The feedback gathered through this consultation helped shape the final version of the Statement and ensured alignment across the business.

Following internal review, the Statement was considered by Ventia's Executive Leadership Team and the Board Safety and Sustainability Committee. Their insights and recommendations were incorporated before the Statement was formally approved by the Ventia Board.

## 7. Looking Forward

Ventia's progress in 2025 is supported by strong, embedded policies and governance processes that address modern slavery risks across our operations and supply chains. Consistent with our commitment to disciplined execution and sustainable practices, we will further review and enhance our risk management approach throughout 2026. This includes strengthening transparency, refining our assessment processes, and working collaboratively with key stakeholders including our supply partners, to drive ongoing improvement and uphold responsible business practices that support resilient and sustainable communities.

# Appendices

## Appendix A: Reporting entities

| Name of Entity                                 |
|------------------------------------------------|
| <b>Australia</b>                               |
| BE & MG Pty Ltd                                |
| BR & I Pty Ltd                                 |
| Broadspectrum (East Timor) Pty Ltd             |
| Broadspectrum (Finance) Pty Ltd                |
| Broadspectrum (Holdings) Pty Ltd               |
| Broadspectrum (International) Pty Ltd          |
| Broadspectrum (Oil & Gas) Pty Ltd              |
| Broadspectrum (USM) Holdings Pty Ltd           |
| Broadspectrum Australia (QLD) Pty Ltd          |
| Broadspectrum Escrow Pty Ltd                   |
| Broadspectrum Holdings (Delaware) Pty Ltd      |
| Broadspectrum Pty Ltd                          |
| Broadspectrum Services Pty Ltd                 |
| BRS Holdco Pty Ltd                             |
| Delron Cleaning Pty Ltd                        |
| Delron Group Facility Services Pty Limited     |
| Eastern Catering Services Holdings Pty Ltd     |
| Eastern Catering Services Pty Ltd              |
| Eastern Pressure Control Pty Ltd               |
| Eastern Well Rigs Pty Ltd                      |
| Eastern Well Service No 2 Pty Ltd              |
| Easternwell Drilling Holdings Pty Ltd          |
| Easternwell Drilling Services Assets Pty Ltd   |
| Easternwell Drilling Services Holdings Pty Ltd |
| Easternwell Energy Rigs Pty Ltd                |
| Easternwell Group Assets Pty Ltd               |
| Easternwell Group Investments Pty Limited      |
| Easternwell Group Operations Pty Ltd           |
| Easternwell Group Pty Ltd                      |
| Easternwell WA Pty Ltd                         |
| Gorey & Cole Drillers Pty Ltd                  |
| Gorey & Cole Holdings Pty Ltd                  |
| ICD (Asia Pacific) Pty Limited                 |
| O.G.C. Services Pty Ltd                        |
| Piver Pty Ltd                                  |
| PNC Plant Hire Pty Ltd                         |

| Name of Entity                                   |
|--------------------------------------------------|
| Powernet Constructions Pty Ltd                   |
| Powernet Design Pty Ltd                          |
| Powernet Employment Pty Ltd                      |
| Powernet Holding Company Pty Ltd                 |
| Silcar Pty Ltd                                   |
| Ten Rivers Pty Ltd                               |
| TS (Procurement) Pty Ltd                         |
| Ven Air Pty Ltd                                  |
| Ventia Asset Infrastructure Services Pty Limited |
| Ventia Australia Pty Ltd                         |
| Ventia Environmental Services Pty Limited        |
| Ventia Finco Pty Limited                         |
| Ventia Holdings I Pty Limited                    |
| Ventia IP Holdings Pty Ltd                       |
| Ventia Leasing Pty Limited                       |
| Ventia Property Pty Ltd                          |
| Ventia Pty Limited                               |
| Ventia Services Group EIP Pty Ltd                |
| Ventia Services Pty Ltd                          |
| Ventia Solutions Pty Limited                     |
| Ventia Training Pty Ltd                          |
| Ventia Utility Services Pty Limited              |
| Vision Hold Pty Limited                          |
| Visionstream Australia Pty Limited               |
| Visionstream Pty Limited                         |
| Visionstream Services Pty Limited                |
| <b>New Zealand</b>                               |
| BRS (NZ Holdings) Limited                        |
| BRS (NZ) Limited                                 |
| Landscape Solutions Pty Limited                  |
| TSNZ Pulp & Paper Maintenance Limited            |
| Ventia NZ Limited                                |
| Ventia NZ Operations Limited                     |
| Visionstream NZ Ltd                              |
| <b>Other Regions</b>                             |
| Ventia Deco LLC                                  |

## Appendix B: Mapping of mandatory reporting criteria

The table below identifies where in this statement we have addressed each mandatory criteria under the Australian Act.

| Australian Modern Slavery Act – mandatory reporting criteria                                                                                                                                       | Ventia response                                                            | Statement Page | Detail                                                                                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Identify the reporting entity                                                                                                                                                                      | About this Statement                                                       | 2              | <ul style="list-style-type: none"> <li>Ventia Services Group identified as the main reporting entity</li> <li>List of all reporting entities covered by the Statement</li> </ul>                                                                                                                               |
|                                                                                                                                                                                                    | Appendix A                                                                 | 17             |                                                                                                                                                                                                                                                                                                                |
| Describe the structure, operations and supply chains of the reporting entity                                                                                                                       | Our Organisation                                                           | 4-6            | <ul style="list-style-type: none"> <li>Four Ventia sectors described</li> <li>Ventia operations infographic</li> <li>Supply partners located outside Australia and New Zealand infographic</li> <li>Ventia spend by region infographic</li> <li>Supply chain spend split across sectors infographic</li> </ul> |
| Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls                            | Overview of Risk Assessment Approach                                       | 7              | <ul style="list-style-type: none"> <li>Our risk management approach</li> <li>Internal validators</li> <li>Geographic location of products and services</li> <li>Identification of product and service risks</li> </ul>                                                                                         |
|                                                                                                                                                                                                    | Risks in Our Supply Chains                                                 | 8              |                                                                                                                                                                                                                                                                                                                |
| Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes | Actions to Address Risk                                                    | 9-14           | <ul style="list-style-type: none"> <li>Risk mitigation measures</li> <li>Formal grievance mechanism details</li> <li>Due diligence process</li> <li>See ‘Strengthening Visa Compliance and Worker Protections’ case study</li> </ul>                                                                           |
| Describe how the reporting entity assesses the effectiveness of such actions                                                                                                                       | Assessing Effectiveness                                                    | 15             | <ul style="list-style-type: none"> <li>Measurement of effectiveness</li> </ul>                                                                                                                                                                                                                                 |
| Describe the process of consultation with any entities that the reporting entity owns or controls                                                                                                  | Consultation Across Ventia Group                                           | 16             | <ul style="list-style-type: none"> <li>Process of consultation</li> </ul>                                                                                                                                                                                                                                      |
| Any other information that the reporting entity considers relevant                                                                                                                                 | Case Study – Responding to allegations involving a secondary subcontractor | 12             | <ul style="list-style-type: none"> <li>Evaluation of Ventia’s response to allegations involving a secondary subcontractor</li> <li>Table of controlled entities provided in Appendix A</li> </ul>                                                                                                              |
|                                                                                                                                                                                                    | Case Study - Strengthening Visa Compliance and Worker Protections          | 13             |                                                                                                                                                                                                                                                                                                                |
|                                                                                                                                                                                                    | Appendices                                                                 | 17-18          |                                                                                                                                                                                                                                                                                                                |
| Details of approval and signature                                                                                                                                                                  | About this Statement                                                       | 2              | <ul style="list-style-type: none"> <li>Details of Statement approvals</li> <li>Managing Director and Group Chief Executive Officer signature</li> </ul>                                                                                                                                                        |
|                                                                                                                                                                                                    | Managing Director and Group Chief Executive Officer statement              | 4              |                                                                                                                                                                                                                                                                                                                |

