



Modern Slavery Statement
Financial Year 2021/2022

1. Our Commitment

The purpose of this statement is to outline our approach in ensuring that Pensar has robust frameworks and processes in place to minimise the risk of modern slavery in our business operations and supply chain. We strive to continually improve and perfect our processes and commit to doing all that we can to help eliminate the risk of modern slavery.

2. Our Business

Pensar designs and delivers infrastructure solutions for a wide range of industry sectors, providing a broad spectrum of technical capabilities in utilities, marine and maintenance to serve the diverse needs of government departments, regional and metropolitan councils, and the private sector. Pensar has a track record of quality, and capability as a critical infrastructure provider, with a philosophy of consistently delivering on expectations.

We offer insightful, original design thinking, implemented by a team with proven expertise to deliver flexible fit-for-purpose critical infrastructure solutions. We have been operating for over 22 years, working across a broad and diverse Australian market.

3. Core Values

Core values support our vision, shape our culture, and reflect what Pensar values. They are the essence of the company's identity – the principles, and beliefs. In a technical discipline of producing critical infrastructure the core values below provide a behavioural set of criteria our team is aligned with in their conduct at Pensar.

By embracing these core values and the pursuit of continual improvement we can ensure a prosperous future for the company and its people. These core values are integral to all aspects of our business:

Respectful - Considered, tactful and diplomatic in all dealings.

Patient - Understanding, measured and confident of achieving positive outcomes.

Flexible - Open to change and consider other people's views.

Accountable - Reliable and deliver on our promises.

Focused - Driven with clear purpose.

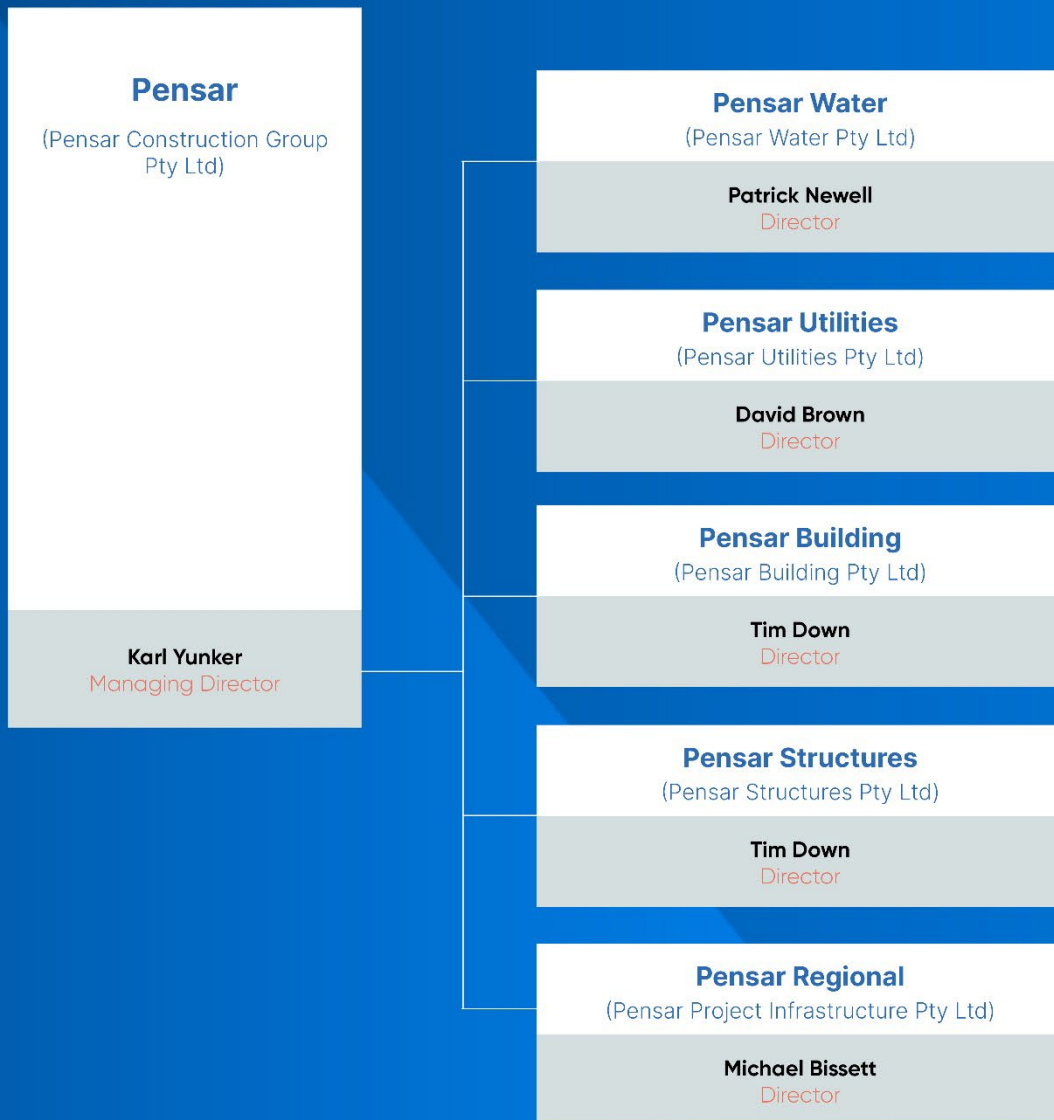
4. Our Structure and Operations

Pensar provides integrated project solutions that span multiple infrastructure types. Drawing on a strategic cross-section of capabilities from across the organisation, we produce a holistic and multidisciplinary solution to industry's diverse requirements. Pensar senior managers are highly credentialed and experienced across the disciplines of power, water, civil infrastructure, concrete remediation, and structural services (utilities, marine and maintenance). We delivery critical infrastructure projects essential to the way of life in Australia and the Pacific. We apply this philosophy on every project, with every person, every day. Pensar's day to day operations involve a centralised group services division along with specialist technical divisions which incorporate smaller teams who deliver infrastructure projects and are located in regional, remote, and metropolitan areas.

Organisation Chart

Corporate Structure

The Company was founded with the establishment of the Pensar Trust in February 2000 and has operated successfully ever since. Over the past 20 years, the Company has undergone many changes to better meet the evolving needs of the infrastructure industry and Pensar's growing list of clients.



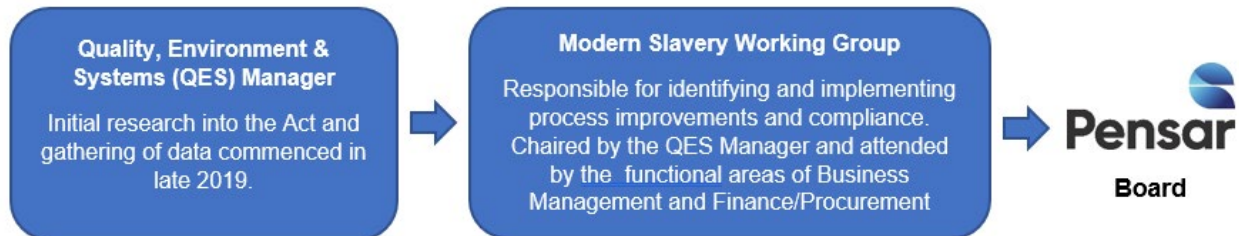
5. Our Suppliers

We are continuously procuring project specific plant, equipment, and materials from our wide range of Australian suppliers, to enable us to deliver vital projects in the utilities, marine and maintenance fields. The categories and description of items that the Pensar entities typically procure are set out in the table below.

Category	Description of goods and services provided
Plant Hire	Hiring of earth moving equipment, specialist equipment, site office containers
Labour Hire	Construction labour, traffic controllers
Direct Equipment	Water pumps, switchboards, traffic lights, streetlights, sewerage and water treatment plant equipment, water reservoirs
Direct Materials	Electrical wires, conduits, building products, water pipes, concrete, coatings, paint, street signs, road building material
Ancillary	Building tools, protective clothing, construction motor vehicles and maintenance, safety equipment, freighting of equipment and materials to various project sites, engineering, and design
Administration	Stationery, office equipment, telecommunications, office cleaners, travel, consultants, rent, accommodation, insurance

During the financial year ended 30 June 2022, the group procured \$96mill of goods and services from 1,420 Australian based suppliers. Our supply chain is key to completing our projects to the standards required by our clients. Pensar has taken steps to communicate with our suppliers about ethically sourcing responsible products and services and in doing so, collectively improving the Modern Slavery landscape.

6. Governance Process



As part of our desire to continually improve, the Modern Slavery Working Group will be expanded during the 22/23 financial year to include a key finance stakeholder. This will deliver further rigour around supplier accountability referring to our onboarding processes.

7. Our Policies and Procedures

The development of a Modern Slavery Policy was Pensar’s goal to mark the submission of our inaugural statement. This policy was approved and published in April 2021. A procedure is being developed and will be issued for use prior to the end of the 2022 to ensure transparency and to enable compliance to the process to be internally audited.

The Pensar Modern Slavery Policy is reviewed annually and displayed on the company website, and internal Intranet.

8. Potential Risks in our Operations and Supply Chains

Potential Risks in our Operations

We currently operate and perform services for our clients in Australia and believe that we have a low operational risk of exposure to modern slavery activities. Our Equal Opportunity, Discrimination and Harassment Policy, and Ethics and Code of Conduct ensure we conduct our operations as they relate to human rights, and in accordance with the law.

Another key aspect of our operations that directly affect our employees, local community, or environment; and one that we are extremely proud of is our safety record. Using our certified integrated management system, we ensure all employees, suppliers and subcontractors operate with our quality, environmental and safety objectives in mind.

Potential Risks in our Supply Chains

All suppliers were invited to complete a questionnaire via Survey Monkey and asked specific questions relating to their understanding and knowledge of modern slavery in relation to their own operations and supply chain. Suppliers were also provided with a copy of Pensar's Supplier Code of Conduct.

Pensar has identified that only 16% of suppliers with an annual spend of > \$250,000 in the last financial year have reported their commitment to mitigating Modern Slavery Risks within their supply chain. We commit to improving the uptake of our survey during the 22/23 financial year, by directly contacting suppliers and highlighting its importance; and will report the results against the "Procurement and Supply Chain" KPI in the next statement.

Based on the responses received from our suppliers and having regard to the type of products we typically procure; we are not aware of any instances of modern slavery within our supply chain. We do believe however that our level of exposure to modern slavery would increase as we track further down the supply chain into the respective countries where goods are manufactured.

In Australia, we have identified that the cleaning contractors that have been engaged to clean our premises operate in an industry that may be at risk of migrant labour exploitation. As such, we ensured they completed our questionnaire.

9. Assessing the Effectiveness of Actions Being Taken to Assess and Address Modern Slavery Risks

The effectiveness of our actions are measured using key performance indicators (KPIs) which continue to be tracked against two key areas:

- Training and Education
- Procurement and Supply Chain
- Disseminate quarterly Internal Communications referring to facets of MS in Australia

General awareness training was rolled out to all Pensar staff towards the end of this financial year. Engagement has been good, with 50% of employees completing the training by the 30th June 2022. The training package is included with the general induction to ensure all new starters complete it as part of their onboarding. The 22/23 Statement will include completion rates as relating to the "Training and Education" KPI.

The number of suppliers completing our survey has increased, and we aim to continue improving the response rate by requesting completion of the survey as a component of sub-contractor / supplier onboarding. As stated in the section above, we will directly target all of our "high-spend" suppliers.

Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement.

10. Consultation within the Pensar Group

Pensar acknowledges that all the entities within the group have an equal role to play in understanding, identifying and reporting any known incidents of Modern Slavery.

The process of consultation involved discussions with the Directors/General Managers of all operating entities to inform them of Pensar's obligations under the Modern Slavery Act and to gather their input on our collective approach to addressing this social governance issue.

This Statement has been prepared in consultation with each entity and has been approved by Pensar's Board.

11. Moving Forward

Pensar will continue to adopt strategies to mitigate our risk through the following processes:

- Supply Chain mapping - identify significant areas of Modern Slavery risk in the deeper tiers of Pensar's supply chain.
- Adopt an effective prequalification process for suppliers and subcontractor to ensure Modern Slavery Act compliance. This will be implemented during the on-boarding process.
- Pensar Modern Slavery working group and regular progress reporting at board meetings will be conducted for continuous monitoring and improvement.
- An external specialist consultant/lawyer will be engaged to perform a gap analysis and discuss best practice.

This statement is approved by the Pensar Board of Directors



Karl Yunker

Managing Director

December 2022