# Modern Slavery Statement

## Financial Year 2025/2026

**Reporting Entity:** GPC Electronics (Holdings) Pty Ltd (ABN: 33 003 070 148)
**Reporting Period:** 1 July 2025 to 30 June 2026 (FY26)

**Australia**
**GPC Electronics Pty Ltd**
**138 Blaikie Road,**
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**New South Wales, 2750**
**Australia.**

**New Zealand**
**GPC Electronics (New Zealand) Ltd**
**10 Sonter Road,**
**Sockburn,**
**Christchurch, 8042**
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**China**
**GPC Electronics (Shenzhen) Ltd Company**
**Liu Yue Madicun,**
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**Long Gang Xu,**
**Shenzhen, 518173**
**People's Republic of China.**

**Hong Kong**
**GPC Electronics (Asia) Ltd**
**Unit 8, 15/F Nanyang Plaza**
**57 Hung To Rd Kwun Tong,**
**Kowloon, Hong Kong.**

# Modern Slavery Statement

## 1 Introduction (Criterion 1)

This Modern Slavery Statement (Statement) is made by GPC Electronics (Holdings) Pty Ltd (ABN: 33 003 070 148) and covers all affiliated operations within the GPC Electronics Group, including our operational facilities located in Sydney (Australia), Christchurch (New Zealand), Shenzhen and Hong Kong (People's Republic of China). GPC Electronics is committed to conducting business lawfully, ethically, and responsibly. We do not tolerate modern slavery or any form of exploitation of individuals in our operations or supply chains, rejecting conduct encompassing slavery, servitude, forced labour, compulsory labour, debt bondage, deceptive recruiting, human trafficking, and the worst forms of child labour.

Where GPC Electronics is required to report under the Modern Slavery Act 2018 (Cth) or other legal requirements, it shall prepare and publish an annual modern slavery statement approved in accordance with the Act. This voluntary Statement outlines our proactive commitment to transparency, ensuring our operational frameworks remain robust, compliant, and prepared to support formal reporting obligations through meticulous record-keeping and internal reviews.

## 2 Structure, Operations, and Supply Chain (Criterion 2)

### 2.1 Our Organisational Structure and Operations

GPC Electronics operates as a tier-one Electronics Manufacturing Services (EMS) provider specialising in high-reliability advanced manufacturing, complex box-build systems, Printed Circuit Board Assemblies (PCBA), and electronic modules. We serve high-compliance, high-precision market sectors, including Defence, Aerospace, Medical, Automotive, and specialised industrial and commercial domains. The scope of this policy extends to all organisational activities and operations carried out directly or indirectly on the organisation's behalf across all geographical locations, including:

- Australia: Head office and manufacturing facility in Penrith (Sydney).
- New Zealand: Subsidiary manufacturing operations in Christchurch.
- People's Republic of China: Regional facility and supply management office in Shenzhen.
- Hong Kong (PRC): Logistical support.

GPC Electronics' headquarters in Sydney, Australia, retains ultimate governance and oversight responsibility for the company's operations in Shenzhen and Hong Kong. This includes oversight of ERP and financial systems, as well as the review and approval of engagements with new and prospective customers, suppliers and other business partners. These centralised governance, due diligence and approval processes strengthen accountability and transparency across the Group, support the identification and assessment of modern slavery risks, and help reduce the likelihood of such risks arising within GPC Electronics' operations and supply chain.

Ultimate accountability for this policy rests with the GPC Electronics board of directors and the group managing director. Operational oversight of modern slavery risk management is delegated to the leadership team, with specific functional responsibilities embedded across Procurement, Operations, Human Resources, and Compliance functions.

### 2.2 Our Supply Chain

To support our high-reliability manufacturing commitments, GPC Electronics manages a multi-tiered global supply chain. Our global procurement footprint involves the sourcing of thousands of highly technical components and operational inputs, primarily categorised as follows:

- Electronic Components: Active and passive semiconductors, integrated circuits, microcontrollers, resistors, capacitors, and custom Printed Circuit Board Assembly (PCBA) inputs primarily procured through verified, authorised global distributors and direct component manufacturers to ensure strict traceability.
- Custom Fabrications: Electro-mechanical assemblies, custom plastic injection mouldings, machined sheet metals, precision metal tooling, and specialised enclosures sourced from regional technical manufacturing partners.
- Indirect Goods and Services: Global freight forwarding, internal logistics and warehousing providers, hardware engineering tools, equipment maintenance services, and specialised operational labour-hire services across our manufacturing footprints.

## 3 Identifying Potential Risks (Criterion 3)

### 3.1 Internal Operational Risks

GPC Electronics assesses its internal operations as low risk for modern slavery. However, potential vulnerabilities are explicitly monitored and managed through internal controls, human resource practices, and targeted ongoing supervision in high-exposure operational clusters:

- Labour hire and recruitment agency arrangements.
- Contractor and consultant engagements.
- Extended working hours and shift oversight across manufacturing teams.

### 3.2 Global Supply Chain and External Risks

GPC Electronics acknowledges that operations in Shenzhen and engagement with third-party suppliers in lower-cost or higher-risk manufacturing regions present elevated risk factors for modern slavery. These relationships are actively monitored. Risk assessments are performed dynamically by evaluating suppliers across specific categories, geographies, product/service parameters, and direct workforce profiles. Our framework actively responds to evolving global trade regulations, shifting customs enforcement thresholds, and international supply chain transparency requirements. We recognise that passive disclosure is no longer sufficient; effective risk management requires dynamic, sub-tier supply chain traceability to prevent operational disruptions and ensure ongoing compliance across all markets we serve.

## 4 Assessing and Addressing Risks (Criterion 4)

### 4.1 Policies and Governance

Compliance with modern slavery controls is a core requirement for all business partners. Our approach embeds risk-based due diligence directly into procurement, supplier management, and broader corporate decision-making, ensuring safe, confidential, and accessible channels remain available for workers to raise concerns without fear of retaliation.

### 4.2 Supplier Due Diligence & Traceability Controls

GPC Electronics maintains a due diligence framework designed to prevent, detect, and respond to risks. Key controls deployed include:

- Pre-Engagement Screening: Vetting new suppliers before formal engagement and executing periodic reviews of existing partners.
- Traceability Mapping: Component-level traceability mapping supporting US risk-tiered enforcement thresholds, moving beyond passive surveys to track sub-tier raw materials, electronic component origins, and foreign beneficial ownership structures.
- Self-Assessments: Utilising supplier questionnaires, declarations, or certifications covering labour practices, working conditions, and recruitment transparency.
- Contractual Warranties: Requiring suppliers, contractors, and labour hire providers to comply with flow-down obligations, audit or information rights, worker grievance mechanisms, and explicit cooperation with investigations.

### 4.3 Remediation Protocol

Where modern slavery risks or instances of non-compliance are identified, GPC Electronics responds in a proportionate, transparent, and responsible manner that prioritises the safety and interests of affected workers. Actions include developing corrective action plans, requiring the repayment of improper recruitment fees, modifying work practices, and referring matters to support services or law enforcement.

GPC Electronics prioritises active remediation and collaborative supplier engagement over sudden, reactionary divestment to insulate vulnerable workers from sudden economic displacement. GPC Electronics reserves the right to terminate for serious or unremedied non-compliance.

### 4.4 Reporting & Whistleblowing Channels

To ensure safe disclosure, we maintain confidential reporting mechanisms. All employees, contractors, and external suppliers are encouraged to report suspected or actual instances of exploitation through direct reporting lines or the GPC Electronics Ethics and Compliance mechanism. GPC Electronics strictly prohibits any form of retaliation against individuals who raise concerns in good faith.

## 5 Measuring Effectiveness of Actions Taken (Criterion 5)

GPC Electronics evaluates its systems to maintain records that support corporate governance, corrective actions, and external reporting obligations. The effectiveness of our framework is tracked through:

- Audit & Questionnaire Yields: Tracking completions, risk levels, and corrective action closure rates across all supplier tiers.
- Traceability Depth: Verifying component-level origin records and beneficial ownership documentation against international trade thresholds.
- Training Participation: Monitoring mandatory employee induction modules and specialised procurement refresher training to ensure teams can identify risk indicators and follow escalation processes.
- Grievance Monitoring: Reviewing the accessibility, volume, and investigation resolution paths of reports processed through whistleblower channels.

## 6 Consultation with Controlled Entities (Criterion 6)

This Statement reflects a collaborative, group-wide approach across all GPC Electronics Group facilities in Sydney, Christchurch, Shenzhen, and Hong Kong.

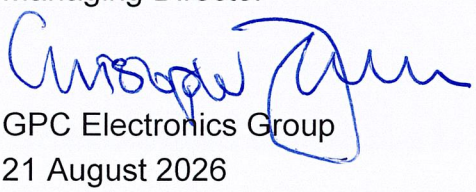
Consultation is built directly into our centralised governance structure. Leveraging Sydney's centralised oversight of ERP systems and partner onboarding, management teams across Sydney, Christchurch, Shenzhen, and Hong Kong maintain ongoing operational dialogue regarding supply chain risks. Key leaders across all sites actively participate in policy reviews, supplier due diligence processes, and the rollout of reporting channels to ensure modern slavery controls and HR practices are applied consistently across all international entities.

## 7 Governance, Approval, and Continuous Improvement

Through our ongoing commitment as a signatory to the UN Global Compact, GPC Electronics aligns its activities with international human rights standards. We commit to strengthening our approach year on year by improving risk assessment models, deepening supplier engagement, monitoring emerging regulatory environments, and adapting controls in line with best practice.

This statement has been approved by the Board of Directors of GPC Electronics Pty Ltd and is signed on behalf of the Board of Directors by Christopher Janssen, Managing Director of GPC Electronics Group.

Managing Director



GPC Electronics Group
21 August 2026