



# MODERN SLAVERY STATEMENT

FY 2022/23





Table of Contents

1 PURPOSE.....2

2 SCOPE.....3

3 POLICY STATEMENT .....3

    3.1 Reporting Entity and Structure of Related Bodies Corporate .....3

    3.2 Ampcontrol Group Operations and Supply Chains .....3

    3.3 Risks of Modern Slavery Practices .....5

    3.4 Actions Taken to Assess and Address Risks .....5

        3.4.1 Employment Practices .....5

        3.4.2 Modern Slavery Training.....5

        3.4.3 Assessing Current Suppliers .....6

        3.4.4 Assessing New Suppliers .....6

        3.4.5 Terms of Trade and Conditions of Purchase .....7

        3.4.6 Sustainable Procurement.....7

        3.4.7 Modern Slavery Policy .....7

        3.4.8 Grievance Mechanism for Employees, Contractors and Suppliers .....7

        3.4.9 Specific risks investigated in 2022/23.....7

    3.5 Measures to Assess the Effectiveness of the Actions Taken .....8

    3.6 Consultation Process .....8

    3.7 Other relevant information – COVID-19 Impact.....8

4 RESPONSIBILITIES .....8

    4.1 Compliance, Monitoring and Review .....8

    4.2 Reporting & Records Management.....8

5 TERMS AND DEFINITIONS .....8

6 RELATED LEGISLATION AND DOCUMENTS .....8

7 FEEDBACK.....9

8 APPROVAL AND REVIEW DETAILS .....10

**1 PURPOSE**

Modern slavery is a crime and a violation of fundamental human rights. Ampcontrol Limited is committed to acting ethically and with integrity in all our business dealings. We respect human rights and take a zero-tolerance approach in accordance with the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and the UN Guiding Principles on Business and Human Rights (UNGPs). Ampcontrol Limited strives to implement effective systems and controls, to ensure that human rights violations are not occurring within our business.

Ampcontrol Limited is also committed to ensuring there is transparency within the business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the *Modern Slavery Act 2018* (Cth) and *Modern Slavery Act 2018* (NSW) (collectively, “the Legislation”). We expect the same high standards from all our suppliers, contractors and business partners and also fully expect that they hold their own suppliers to the same high standards.

## 2 SCOPE

This Statement will fulfil Ampcontrol Limited's obligations under the Legislation for the company's financial year, being 1 August 2022 to 31 July 2023, and has been approved by the Board of Directors of Ampcontrol Limited.

## 3 POLICY STATEMENT

### 3.1 Reporting Entity and Structure of Related Bodies Corporate

The reporting entity is Ampcontrol Limited, however the required reporting under the Legislation also covers any related body corporate.

Ampcontrol Limited comprises the following wholly owned subsidiaries:

- Ampcontrol CSM Pty Limited;
- Ampcontrol SWG Pty Ltd;
- Ampcontrol Service (NSW) Pty Ltd;
- Ampcontrol (QLD) Pty Ltd;
- Ampcontrol Cables NSW Pty Ltd;
- Ampcontrol Burn Brite Pty Ltd;
- Ampcontrol International Holdings Pty Ltd;
- Verico Group Pty Ltd;
- Verico Training Services Pty Ltd (Deregistered 21 Dec. 2022);
- Capacitor Technologies Pty Ltd (Trading as Ampcontrol Captech);
- Complete Power Solutions Pty Ltd (Trading as Ampcontrol CPS);
- Ampcontrol Transformers Pty Ltd;
- ATF Mining Electrics Pty Ltd; and
- Androck Engineering & Mining Pty Limited.

Ampcontrol Limited also includes the following related entity (for reporting purposes under the Legislation):

- Restech Pty Limited.

(Collectively, "**Ampcontrol**" or "**Ampcontrol Group**").

During the reporting period this Statement covers, companies within the Ampcontrol Group were consulted on the development of this Statement. With the exception of the specific instances referred to below, companies within the Ampcontrol Group utilise Ampcontrol Group Procurement.

Capacitor Technologies Pty Ltd have not been utilising Ampcontrol Group Procurement, with all procurement being in-house. Over the FY2022/23 Ampcontrol Group Procurement have begun to assess Capacitor Technologies supply chains in line with Ampcontrol Group Procurement procedures and this will continue over the next 12 months.

Ampcontrol International Holdings Pty Ltd companies (Ampcontrol Singapore Pty Ltd; Ampcontrol Mongolia LLC; and Ampcontrol Hong Kong Pty Ltd), currently all procurement being in-house. Ampcontrol Group Procurement will be assessing their supply chains in line with Ampcontrol Group Procurement procedures in Q1 and Q2 of FY23/24.

Ampcontrol Limited acquired Androck Engineering & Mining Pty Limited in May 2023. Given the limited time Androck were part of the Ampcontrol Group in the 2022/23 financial year, assessing Androck's modern slavery risk and including them under the Ampcontrol Group Procurement process will occur over the next 12-24 months.

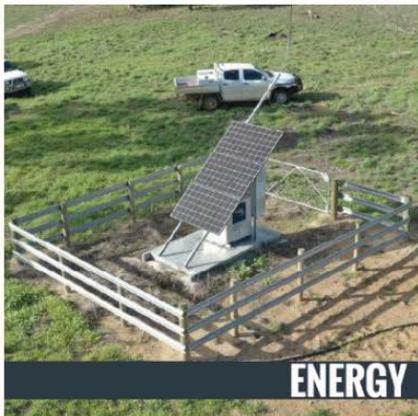
Ex Testing and Certification Pty Ltd ("ExTC") is a wholly owned subsidiary of Ampcontrol Limited, which conducts business as an independent company from the main Ampcontrol Group. Given the nature of the work completed by ExTC it is not envisaged that there would be modern slavery within the limited supply chain. This was confirmed in enquiries which were made to the General Manager of ExTC.

### 3.2 Ampcontrol Group Operations and Supply Chains

The Ampcontrol Group delivers integrated electrical, electronic and control solutions to improve safety and efficiency in mining, renewable, infrastructure and industrial applications.

What sets Ampcontrol apart is our ability to engineer unique solutions that deliver on both performance and reliability. To achieve this, Ampcontrol works in partnership with our customers, lending our electrical engineering expertise to solve their operational challenges. From the most complex electrical infrastructure to the most hazardous industrial environments, we engineer solutions which focus on whole of life optimisation.

Drawing on the multi-disciplined technical resources within the Ampcontrol business, we step outside the conventions of traditional problem solving, and seek new ways to improve electrical infrastructure design through smart electronics, intelligent data gathering; and operational networking and control. Ampcontrol then back this up with in-house manufacturing, commissioning, testing, electrical engineering and maintenance support teams.



## OUR VALUES



### *Safety*

Our goal is to have everyone arrive home safely every day so we take pride in developing and making our products to the highest possible standards.



### *People*

We believe our people make our business better which is why we value collaboration, working with integrity and making good decisions for our customers, our business and each other.



### *Innovation*

Innovation is the combined efforts of our people across the world. We encourage new ideas and know that challenging the status quo is what sets us apart as a business.



### *Customer*

We are all about helping our customers. The approach is simple. Listen. Be solutions oriented. Deliver with pride and professionalism – every time.



### *Performance*

Taking our business forward is a result of our combined efforts. We celebrate our performance and recognise people for their contribution.

## 3.3 Risks of Modern Slavery Practices

The Ampcontrol Group operate across many different locations and supply chains, and as such Ampcontrol have identified that the risk of modern slavery varies across these business operations and locations. From a practical perspective, this means that within the Ampcontrol Group, each entity faces different modern slavery challenges.

A few of the specific issues which Ampcontrol have taken action to address in their supply chain are conflict minerals, issues relating to identification documentation, use of forced labour, and child labour. These enquiries are made via the Supplier Assessment Questionnaire and a desktop audit and interviews to identify the supplier's management process and controls.

## 3.4 Actions Taken to Assess and Address Risks

Ampcontrol are striving to implement effective systems and controls to ensure modern slavery risk is addressed within our business or supply chains. The process of assessing modern slavery risks is being approached in stages. The first step being current supplier audits and potential supplier evaluations, future steps include identifying countries which may have a higher risk profile and addressing supply issues related to these countries.

A range of actions have been undertaken to identify and engage with suppliers who may violate human rights or procure goods/services produced using modern slavery.

### 3.4.1 Employment Practices

Ampcontrol is committed to ensuring the human rights of employees are respected through our internal policies and practices, including the Freedom from Discrimination, Harassment, and Bullying Policy and the Grievance Resolution Procedure. All recruitment activities and appointments are fair, equitable, respectful, transparent, consistent, and confidential. The aim is for all employees to work in a safe and professional work environment.

### 3.4.2 Modern Slavery Training

Ampcontrol has its own internal training platform called Bright Spark – which brings together training content and modules from a large number of training providers. All procurement personnel have completed a course in Bright Spark on Modern Slavery. The modern slavery training completed is entitled “*Modern Slavery Awareness*” and is provided by Savv-e Learning. Savv-e Learning are a training provider who create online modules covering many varied business topics. The “*Modern Slavery Awareness*” training covered the basics of modern slavery, why and how modern slavery occurs in supply chains and operations, compliance with the Australian modern slavery legislation, and highlighted actions which can be taken to ensure transparency in supply chains and operations.

In February 2023, Ampcontrol personnel from the sustainability and commercial/legal teams attended (or reviewed) the *"The Future of Modern Slavery Reporting in Australia"* webinar presented by GRC Solutions and Fair Supply. This webinar detailed what is expected to occur as a result of the Modern Slavery review conducted by the Australian Government at the end of 2022. A summary of this webinar was provided to the HSEQ and Procurement teams for their information.

Procurement positions have also been trained on Ampcontrol's Responsible Supply Chain Policy and accompany supplier Code of Conduct, which is currently being rolled out to suppliers.

### **3.4.3 Assessing Current Suppliers**

To ensure that modern slavery is a consideration in the procurement process, tools such as the Procurement Supplier Purchasing and Inventory Management Business Standard have been updated. This Business Standard includes requirements relating to ethical behaviour, sustainability, modern slavery and social responsibility.

Assessment of modern slavery risk forms part of the annual or bi-annual supplier audit process. To facilitate this the Supplier Quality Risk Matrix includes Modern Slavery in the Supply Risk Calculation Matrix.

Within this Supply Risk Calculation Matrix there is a question on whether the supplier has a Modern Slavery Statement. There are three possible options – policy in place, no policy in place, and modern slavery risk not reviewed. For this question rules have been established by Ampcontrol Group Procurement, and relevant business units, in response to suppliers who advise they do not have a Modern Slavery Policy/ Statement in place, or the modern slavery risk has not been reviewed.

Where suppliers indicate they do not have a modern slavery policy or have not reviewed their modern slavery risk, Ampcontrol will recommend that they take measures to investigate, and where required, address modern slavery risks within their supply chains. Particularly where the supplier may not have a statutory obligation, they will be encouraged to submit a voluntary statement.

In FY 2022/23 Ampcontrol have completed desktop audits of six suppliers and engaged third parties for onsite audits for a further two suppliers. The Ampcontrol Group Procurement Team are currently planning to expand the program on onsite audits for existing and potential suppliers – these should be rolled out in the next financial year.

Ampcontrol will use the Supplier Quality Risk Matrix (and these rules) to make a determination of the supplier's risk profile, to determine how critical this supplier is to Ampcontrol's supply chain.

### **3.4.4 Assessing New Suppliers**

Ampcontrol continued to use the Supplier Evaluation or Review Work Instruction to assist in assessing modern slavery risk when engaging new suppliers. This Work Instruction provides guidance on how to use the mechanisms in the Supplier Assessment Questionnaire. A key step in Ampcontrol's procurement process involves vetting new suppliers via the Supplier Assessment Questionnaire.

The Supplier Assessment Questionnaire includes questions relating to modern slavery and conflict minerals and is used to assess new companies entering the Ampcontrol supply chain. This information is reviewed, and a determination is made as to whether the supplier will be engaged. Determination is made in relation to compliance with the Modern Slavery Act and additional any applicable local or national legislation.

- Where a supplier has a turnover of greater than \$100 million and they advise they have not assessed their modern slavery risk – Ampcontrol will request that they review their legislative obligations and prepare a Modern Slavery Statement where required. A timeline will be requested to complete the Statement (where required).
- For suppliers with a turnover of less than \$100 million, who have not assessed their modern slavery risk, Ampcontrol will encourage them to prepare a voluntary Modern Slavery Statement (refer them to the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities Section 3). For those deemed higher risk/higher spend suppliers, Ampcontrol will communicate clearly the expectations in relation to preparation of a voluntary Modern Slavery Statement and make them aware of modern slavery risks. Where the supplier does not comply Ampcontrol will

assess how critical this supplier is to its supply chain. For low risk/low spend suppliers a greater timeframe will be given for them to evaluate their supply chain before preparing a voluntary Modern Slavery Statement.

#### **3.4.5 Terms of Trade and Conditions of Purchase**

Modern Slavery provisions have been added to both the Ampcontrol Terms of Trade and the Conditions of Purchase. Under both of these we require companies to warrant that they are compliant with the legislation, there are no outstanding investigations, and that they have not been convicted of an offence under applicable Modern Slavery legislation. In addition, where Tin, Tungsten, Tantalum, or Gold (3T&G) are used, suppliers are required to maintain source of origin or smelter records, which can be provided to Ampcontrol when requested.

#### **3.4.6 Sustainable Procurement**

As part of their commitment to sustainability, Ampcontrol engaged an external consultancy firm to conduct a review and produce a report into supply chain sustainability risk and opportunity, based on ISO 20400 responsible procurement standard. A Gap Analysis and Recommendation Report was produced, which assessed Ampcontrol's current policies, processed and planned activities against the appropriate standards and guidance.

Ampcontrol have reviewed the recommendations in the report and determined key areas which will be addressed over the next 12 months. This led to the publication of Ampcontrol Group's Responsible Supply Chain Policy and accompanying Supplier Code of Conduct. Activities to roll out and ensure compliance with the policy and code of conduct are currently underway.

#### **3.4.7 Modern Slavery Policy**

A Modern Slavery Policy has been developed which will be used for tenders, customer enquiries and to educate staff. This Modern Slavery Policy underpins this Modern Slavery Statement on a practical level, giving Ampcontrol a document which can be utilised on an everyday basis. This policy also helps to ensure compliance and transparency in our business and in our approach to eradicating any modern slavery identified throughout our supply chains.

#### **3.4.8 Grievance Mechanism for Employees, Contractors and Suppliers**

Ampcontrol Business Standard BS-05 (Procurement Supplier Purchasing and Inventory Management) sets out the principles and practices for the procurement of goods, materials, and services. Part of BS-05 requires Ampcontrol employees to evaluate a supplier's modern slavery risk. If a supplier has a modern slavery statement or policy this is reviewed, and the supplier's suitability is based upon this. If a supplier does not have a modern slavery statement, then additional actions are required to enable assessment of the supplier. If a supplier is to be utilised however there has been a disagreement between Ampcontrol employees as to the modern slavery suitability of the supplier, an Ampcontrol employee could escalate the issue in accordance with Ampcontrol's PRO-132 Grievance Resolution Procedure.

Should the Ampcontrol employee not deem PRO-132 a suitable method in which to air the grievance, under Ampcontrol's Whistleblower policy a discloser may report to Ampcontrol's external independent whistleblowing service any instances of modern slavery in their supply chain. A report using this service can be made anonymously and will be handled in accordance with Ampcontrol's Whistleblower Policy.

#### **3.4.9 Specific risks investigated in 2022/23**

Ampcontrol were contemplating a service/labour/workshop partnership with a company in Mongolia. As part of the arrangement, Ampcontrol would be relying on the workforce and labour provisions in Mongolia. Given the nature of the engagement, and the potential risk of modern slavery, Ampcontrol decided a modern slavery assessment should be conducted. TÜV Rheinland were engaged to complete a Modern Slavery Audit, based on a Supplier Audit Checklist provided by Ampcontrol. The Supplier Audit Checklist includes eleven factors related to employment conditions, working conditions, and compliance with local and national laws and regulations. Qualified inspectors visited the company's premises to complete a modern slavery physical audit and report. TÜV Rheinland provided Ampcontrol with an 11-page detailed report, including a written assessment and photographic evidence. An analysis of the report concluded the modern slavery risk was low. Whilst a Channel Partner MOU has been prepared to enable the Mongolian

company to be a distributor of Ampcontrol products, offer field service installation support, and product technical support, this has not yet been executed by Ampcontrol and nothing further has progressed.

### 3.5 Measures to Assess the Effectiveness of the Actions Taken

The Supplier Assessment Questionnaire will be reviewed periodically to ensure that modern slavery risks are being adequately captured and assessed where they are identified in the Ampcontrol supply chain.

Ampcontrol will assess the results of the audit process to determine if further actions are required. In addition, the business rules, established by Ampcontrol Group Procurement, will be assessed to determine if a more rigorous auditing process would be appropriate to assess the effectiveness of our actions.

### 3.6 Consultation Process

Information in relation to the requirements under the Legislation were provided to Ampcontrol Group Procurement department and the HSEQ Steering Group. The HSEQ Steering Group has members from various entities within the Ampcontrol Group.

The Ampcontrol Group Procurement Department, Ampcontrol Senior Leadership Team, and the HSEQ Steering Group were provided the Modern Slavery Policy for comment before it was finalised and approved by the board of Ampcontrol Limited.

### 3.7 Other relevant information – COVID-19 Impact

Ampcontrol would like to acknowledge the challenges which COVID-19 has continued to place on the business in the 2022/23 financial year, albeit reduced significantly from previous years. Ampcontrol have endeavoured to proactively manage the COVID-19 risk and impact on Ampcontrol, its customers, and our employees. COVID-19 has had a significant impact on global supply chains, which Ampcontrol acknowledges has the potential to increase the risk of modern slavery practices occurring.

## 4 RESPONSIBILITIES

### 4.1 Compliance, Monitoring and Review

This Statement will be updated on an annual basis, as per the requirements under Legislation.

### 4.2 Reporting & Records Management

The Commercial Services Team will keep records of any incidents of modern slavery identified and the actions taken. Where appropriate the Commercial Services Team will refer to the Chief Financial Officer any incidents which may require further investigation or management.

## 5 TERMS AND DEFINITIONS

**“Ampcontrol”** means all references contained in this document to Ampcontrol Limited including any related body corporate.

**“Modern Slavery”** is as defined in the Modern Slavery Act 2018 (Cth) as including any conduct constituting a modern slavery offence (as defined within the Act), and/or any conduct involving the use of any form of slavery, servitude or forced labour to exploit children or other persons taking place in the supply chains of government agencies or nongovernment agencies.

## 6 RELATED LEGISLATION AND DOCUMENTS

### Legislation

*Modern Slavery Act 2018 (Cth)*  
*Modern Slavery Act 2018 (NSW)*

### **Internal Policies and Procedures**

BS-05 Procurement Supplier Purchasing and Inventory Management Business Standard  
FRM-058 Ampcontrol Terms of Trade  
FRM-492 Ex Supplier Quality Risk Matrix  
FRM-147 Ampcontrol Conditions of Purchase  
FRM-1629 Supplier Assessment Questionnaire  
HSEQ-33 Supplier Code of Conduct  
POL-007 Ampcontrol Modern Slavery Policy  
POL-009 Responsible Supply Chain Policy  
PRO-132 Grievance Resolution Procedure  
WI-668 Supplier Evaluation or Review Work Instruction

## **7 FEEDBACK**

Users and managers may provide feedback about this document by emailing:  
[Commercial.Services@ampcontrolgroup.com](mailto:Commercial.Services@ampcontrolgroup.com).

## 8 APPROVAL AND REVIEW DETAILS

This Statement has been approved by the Board of Directors of Ampcontrol Limited.



---

Rod Henderson  
MANAGING DIRECTOR & CEO

16 January 2024

<b>Approval and Review</b>	<b>Details</b>
Approval Authority	Approved by the Board of Ampcontrol Limited
Administrator	Commercial Services
Next Review Date	Financial Year 2023/24 Statement
<b>Approval and Amendment History</b>	<b>Details</b>
Original Approval Authority and Date	Created by Commercial Services and approved by Group Manager – Legal & Commercial
Amendment Authority and Date	Approved and adopted by Ampcontrol Limited Board of Directors

### **Ampcontrol Limited**

#### **Head Office**

21 Old Punt Road  
Tomago NSW 2322  
Telephone +61 2 4961 9000  
Fax: +61 2 4961 9009  
[info@ampcontrolgroup.com](mailto:info@ampcontrolgroup.com)

[www.ampcontrolgroup.com](http://www.ampcontrolgroup.com)

