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## MODERN SLAVERY STATEMENT

FY 2021/22

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### 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. In addition, Ampcontrol Limited will strive to implement effective systems and controls, to ensure that it is not occurring anywhere 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 financial year 1 July 2021 to 30 June 2022 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

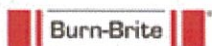
The reporting entity is Ampcontrol Limited, however the required reporting under the Legislation also covers any related body corporate.

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;
- Austech Instruments Pty Limited;
- Capacitor Technologies Pty Ltd (Captech);
- Complete Power Solutions Pty Ltd (CPS National);
- Ampcontrol Transformers Pty Ltd; and
- Ex Testing and Certification Pty Ltd.

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

- Restech Pty Limited;
- (Collectively, “Ampcontrol” or “Ampcontrol Group”).

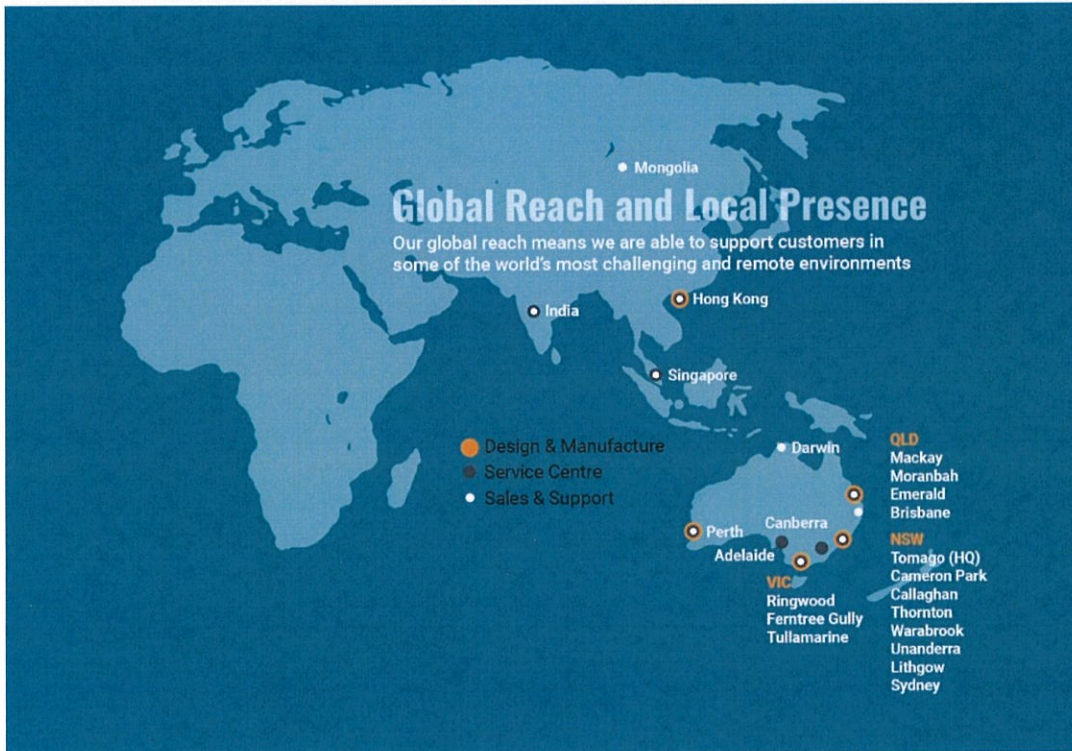


### 3.2 Ampcontrol Group Operations and Supply Chains

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 MARKETS

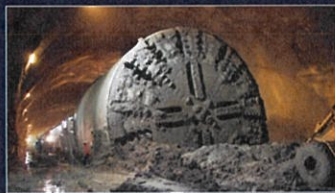
We specialise in the design and supply of complete system solutions with a focus on electrical and control applications



Renewables and Power



Mining and Resources



Infrastructure



Industrial and Commercial

## 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 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 made enquiries about in their supply chain are conflict minerals, issues relating to identification documentation, and child labour. These enquiries are made via the Supplier Assessment Questionnaire and a desktop audit 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 is not occurring anywhere 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 avoid suppliers who may use slavery or 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 Bully 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 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 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.

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

### **3.4.3 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.

- 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 time-line 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.

### **3.4.4 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.

### **3.4.5 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. 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.

### **3.4.6 Other Actions**

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.

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.

### **3.4.7 Specific risks investigated in 2021/22**

Ampcontrol became aware of potential forced labour issues with the suppliers being engaged to provide solar panels to a number of the workshops. The Commercial Services Team reviewed the information provided (a third party investigative report) and requested further information from the suppliers (including their Modern Slavery statements and associated sustainability reports). An analysis of this information concluded, on the face of the information given and on examination of the reports provided from the suppliers, no action should be taken at this time. However, these suppliers have been flagged for regular review.

One of Ampcontrol's subsidiaries, Complete Power Solutions Pty Ltd, required generators from manufacturers in China. The Ampcontrol Group Procurement Department engaged Offshore Imports and Consultancy to complete an investigation into two potential manufacturers. Offshore Imports and Consultancy were tasked with completing 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 both premises to complete a modern slavery physical audit and report. Detailed reports were provided to Ampcontrol, including a written assessment and photographic evidence. An analysis of the reports concluded the modern slavery risk was low and both the manufacturers were approved.

### **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 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 2021/22 financial year. 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  
POL-007 Ampcontrol Modern Slavery Policy  
WI-668 Supplier Evaluation or Review Work Instruction

### FEEDBACK

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

## 7 APPROVAL AND REVIEW DETAILS

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

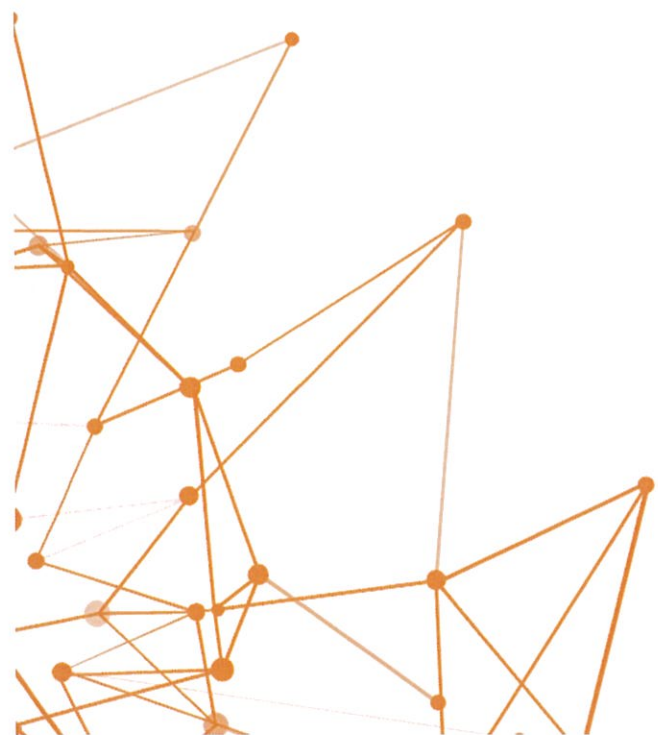


Rod Henderson  
MANAGING DIRECTOR & CEO

September 2022



Approval and Review	Details
Approval Authority	Approved by the Board of Ampcontrol Limited
Administrator	Commercial Services
Next Review Date	Financial Year 2022/23 Statement
Approval and Amendment History	Details
Original Approval Authority and Date	Created by Commercial Services and approved by Legal Counsel
Amendment Authority and Date	Approved and adopted by Ampcontrol Limited Board of Directors



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