

EPEC Group

Modern Slavery Statement



Introduction

EPEC Group is committed to upholding the principles of human rights and ensuring that modern slavery has no place in our operations or supply chain. This Modern Slavery Statement outlines EPEC Group's current efforts and future commitments to identify, assess, and mitigate modern slavery risks within our operations and supply chain. As a company working within the HV construction and grid connection industry, EPEC Group recognises the potential for modern slavery risks and remains steadfast in promoting ethical practices throughout its operations and supply chain. Our commitment aligns with the Modern Slavery Act 2018 (Cth) and reflects our organisational values of integrity, transparency, and respect for human rights.

Organisational Structure



EPEC Group (ACN 634 234 129) is an Australian-based organisation specialising in substation construction and grid connection projects. Our business operations are headquartered in Brisbane, Queensland, with projects executed across Australia. We employ a diverse team of skilled professionals and collaborate with suppliers and contractors to deliver high-quality services in construction, engineering, and project delivery.

Our services include:

- Design and construction of high-voltage substations
- Grid connection solutions for renewable energy projects
- Civil and electrical construction services
- Testing and commissioning of electrical infrastructure

EPEC Group's structure includes EPEC Projects (640 363 686) and EPEC Engineering (640 363 739), which is supported by robust governance frameworks that enable ethical business conduct and risk management.

Supply Chain Overview

EPEC Group's supply chain comprises local and international suppliers. We source materials, equipment, and services from organisations located in Australia, Europe, and Asia.

Our supply chain includes suppliers of:

- Construction materials and equipment
- Substation components
- Transportation and logistics
- Professional consulting and engineering services

Mitigating Risks in EPEC's Operations

EPEC Group is committed to ensuring that its own operations uphold the highest ethical standards and remain free from any modern slavery risks. While the risk of modern slavery within EPEC Group's direct employment practices is considered low, we recognise the importance of robust measures to mitigate any potential vulnerabilities.

The following practices are embedded within our Human Resources and operational frameworks:

- **Human Resource Management (HRM) Practices:** EPEC Group has established clear policies and procedures to ensure fair and ethical treatment of all employees. These include equitable recruitment practices, regular employee reviews, and transparent grievance mechanisms.
- **Right to Work Checks:** All employees are subject to verification of their right to work in Australia. This includes ensuring valid work rights through visa checks for non-resident workers, conducted in line with government requirements.
- **Background Checks:** As part of EPEC Group's pre-employment process, background checks are conducted for all new hires to ensure compliance with legal and ethical employment practices.
- **Employment Contracts:** EPEC Group issues formal employment contracts to all personnel, which clearly outline terms and conditions, including wages, hours of work, and entitlements in line with Australian labour laws.



Identifying Modern Slavery Risks

EPEC Group has conducted a preliminary risk assessment to identify and assess modern slavery risks within our operations and supply chain. This assessment was based on insights gathered through our Modern Slavery Questionnaire, which was distributed to suppliers to evaluate their governance practices, geographic exposure, and risk management processes.



The following key areas were considered as part of our risk identification process:

Geographic Risks:

The majority (83%) of our suppliers operate exclusively in Australia, a low-risk jurisdiction with strong governance and regulatory protections. 12% source products from moderate-risk regions, such as parts of Southeast Asia, while 5% source from high-risk regions, including China, where weaker governance and limited protections increase modern slavery risks.

Supplier Governance:

Our assessment revealed that 68% of suppliers have formal policies to address modern slavery risks, such as codes of conduct and contract clauses. However, gaps remain, with 32% lacking structured governance frameworks.

Monitoring and Audits:

While 40% of suppliers reported conducting audits or on-site visits, monitoring practices were less consistent across supply chains, particularly in moderate-and high-risk regions.

Training and Awareness:

Modern slavery awareness training is provided by 75% of suppliers to internal staff, with 45% extending this training to their supply chains. Despite this, some suppliers acknowledged the need for improved education on identifying and managing risks.

Actions Taken to Address Modern Slavery Risks

EPEC Group has taken meaningful steps to address modern slavery risks within its operations and supply chain. We recognise that further actions are required to strengthen our approach, and we are committed to continuous improvement. Current actions include:



Supplier Due Diligence



EPEC Group has implemented processes to assess and address modern slavery risks within our supply chain. As part of our Supplier and Contractor Management Standard, suppliers undergo a prequalification process that evaluates their ethical practices, labour standards, and governance frameworks. This ensures alignment with EPEC Group's expectations for responsible and transparent business conduct. A risk-based approach is applied to prioritise suppliers operating in higher-risk regions or industries for further engagement.

Modern Slavery Questionnaire

Suppliers are required to complete a Modern Slavery Questionnaire designed to assess their understanding of modern slavery risks and existing mitigation practices. The questionnaire collects information on governance frameworks, ethical policies, and labour management processes, enabling EPEC Group to identify any potential areas of concern. This process provides valuable insights into supplier operations and highlights where additional monitoring or engagement may be necessary.

Risk Classification

Responses to the Modern Slavery Questionnaire are systematically reviewed and categorised to determine risk levels. Suppliers are assessed based on geographic exposure, governance practices, and industry-specific vulnerabilities, enabling us to identify and prioritise high-risk suppliers for further engagement.

Supplier Monitoring and Audits

As part of the Supplier and Contractor Management Standard, EPEC Group has established a framework to conduct ongoing monitoring and periodic audits of suppliers, particularly those identified as high-risk.

Supplier Engagement

EPEC Group has initiated direct conversations with suppliers to communicate our expectations regarding ethical business practices. These discussions reinforce the importance of identifying, addressing, and mitigating modern slavery risks within their operations and broader supply chains.


Internal Awareness

Internal stakeholders across EPEC Group are briefed on modern slavery awareness as part of our broader risk management processes. This includes highlighting the importance of identifying indicators of modern slavery through training and ensuring relevant personnel understand their role in upholding ethical business standards.




Effectiveness of Actions

EPEC Group has established a solid foundation for addressing modern slavery risks through proactive supplier engagement, risk assessments, and internal awareness initiatives. The implementation of our Modern Slavery Questionnaire has provided valuable insights into supplier governance, labour practices, and geographic risks, enabling us to identify and categorise suppliers based on their risk profiles. Our prequalification process has ensured that suppliers align with our expectations for ethical conduct, while direct engagement with suppliers has reinforced the importance of transparency and accountability.

A solid blue circle is positioned to the left of the text block.

These actions have allowed us to develop a clearer understanding of modern slavery risks within our supply chain. The majority of our suppliers operate within low-risk regions, and no instances of modern slavery have been reported to date. However, we recognise that certain gaps remain, particularly in formal governance frameworks, supplier audits, and ongoing monitoring processes.

A large, light blue arc is positioned behind the text block, spanning across the width of the page.

EPEC Group acknowledges that continuous improvement is essential to ensure long-term effectiveness. Strengthening governance, enhancing training, and implementing more robust monitoring mechanisms will allow us to build on our current progress. The future commitments outlined in this statement represent our proactive steps to address these gaps, further strengthen our processes, and drive meaningful change across our operations and supply chain.

Future Commitments

EPEC Group acknowledges that addressing modern slavery risks requires ongoing effort and improvement. We are committed to enhancing our current approach and implementing measures to strengthen our ability to identify, mitigate, and prevent modern slavery within our operations and supply chain.



Strengthening Governance and Policies

EPEC Group will introduce a formal Supplier Code of Conduct to set clear expectations for ethical business practices, labour standards, and modern slavery prevention prior to our next reporting period. Modern slavery clauses will be incorporated into all supplier contracts to ensure compliance and accountability. We will also finalise a comprehensive Whistleblower Policy, providing a safe and confidential platform for employees, suppliers, and stakeholders to report concerns.

Implementing Training and Awareness Programs

EPEC Group will roll out training programs for internal staff to raise awareness of modern slavery risks, key indicators, and reporting processes. These programs will equip employees with the tools to promote ethical procurement practices. Training initiatives will also be extended to high risk suppliers to encourage shared responsibility for preventing modern slavery.

Improving Reporting and Remediation Mechanisms

To enhance transparency, we will establish confidential reporting channels for employees and suppliers to report suspected modern slavery risks or issues. Additionally, we will implement a formal remediation process to address concerns, including corrective action plans and timelines, with escalation for unresolved non-compliance, up to and including contract termination.

Enhancing Supplier Monitoring and Audits

EPEC Group will implement a supplier audit program to monitor compliance with modern slavery prevention measures. This will focus on high-risk suppliers through on-site visits, governance reviews, and labour practice verifications, providing greater visibility and proactive risk management. By prioritising these commitments, EPEC Group aims to strengthen our ethical operations and supply chain and uphold our responsibility to combat modern slavery.

Approval

This Modern Slavery Statement has been approved by EPEC Group's Board of Directors on 15th February 2025 and signed by the Managing Director.

A handwritten signature in black ink, appearing to read "M. Moczynski", is positioned above the name of the signatory.

Michael Moczynski