

MODERN SLAVERY STATEMENT

SRG Global Limited (Company) ACN 104 662 259 MAKING THE COMPLEX
SIMPLE



Reporting Entities

This Statement is made under the Australian Modern Slavery Act 2018 (Cth) (the Act) for the financial year ending 30 June 2024 (FY24) and is published by SRG Global Limited (ACN 104 662 259) (SRG Global), and on behalf of all wholly owned entities identified in the Schedule of Reporting Entities set out in Appendix A on page 26.

This Statement does not represent, nor is it intended to cover, any joint venture vehicle or asset which was not either wholly owned or controlled by SRG Global during the reporting period.

In preparing this Statement, SRG Global has considered prior feedback received from the Australian Border Force following the issuance of previous statements of compliance, external published material and by reviewing the statement submissions of our peers. All references to 'us', 'we', 'our' or 'the Company' in this Statement is a reference to SRG Global.



Statement of the Chairman

SRG GLOBAL 2024 MODERN SLAVERY STATEMENT



Our fourth Modern Slavery Statement continues to highlight the steps we are undertaking to improve visibility and control of our supply chain, including the risks of modern slavery.

The successful release of our supplier application portal in FY23 has improved oversight on new supplier applications. Since implementation, more than 1,600 new supplier applications have been processed.

In FY24 we continued to build on awareness programs with our people with the release of an updated bespoke education package throughout our workforce. We recognise our frontline workforce are integral to raising concerns of potential modern slavery breaches and during the year we commenced a review of our reporting procedure to ensure notifications are handled in a timely and appropriate manner.

During FY25, our focus will be on improving our knowledge of our unrelated third-party transaction exposures to modern slavery. Whilst many of our transactions relate to Australian domiciled entities, we recognise finished goods are often sourced from thirdparty international locations. As our operations continue to grow in scale and complexity, we will use this opportunity to refine our purchasing and governance practices to ensure we, and our supply partners, remain compliant to their obligations.

This Statement was approved by the SRG Global Board of Directors on 27 November 2024 on behalf of itself and the other reporting entities listed in Appendix A (page 26).

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Peter McMorrowNon-Executive Chairman



Reporting Criteria	Section	
Identify the reporting entity	Reporting entities (Page 4) Schedule of entities (Page 26)	
Describe its structure, operations and supply chains	Our structure, operations and supply chains (pages 8 to 13)	
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Modern slavery risks in our supply chain (pages 14 and 15)	
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Our actions to address modern slavery risks (pages 16 to 17)	
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Assessing the effectiveness of our actions (pages 22 and 23)	
Describe the process of consultation with any entities the reporting entity owns or controls	Consultation (page 24)	
Any other relevant information	Not applicable	

OUR STRUCTURE, AND OPERATIONS

SRG Global is a diversified infrastructure services company. We bring an engineering mindset to the delivery of critical services for major industry, across the entire asset lifecycle of **Engineer | Construct | Sustain.**

As a partner to Australia's largest critical service providers, we provide essential services including time-critical shutdowns, asset maintenance and operational expertise. Our industries span critical services benefiting a broad range of communities.

STRUCTURE

Headquartered in Western Australia, we are delivering against our vision to become the "most sought-after" diversified infrastructure services company in the industries in which we operate. Our strategic acquisition of Asset Care (February 2023) continues to expand our service offering.⁽¹⁾

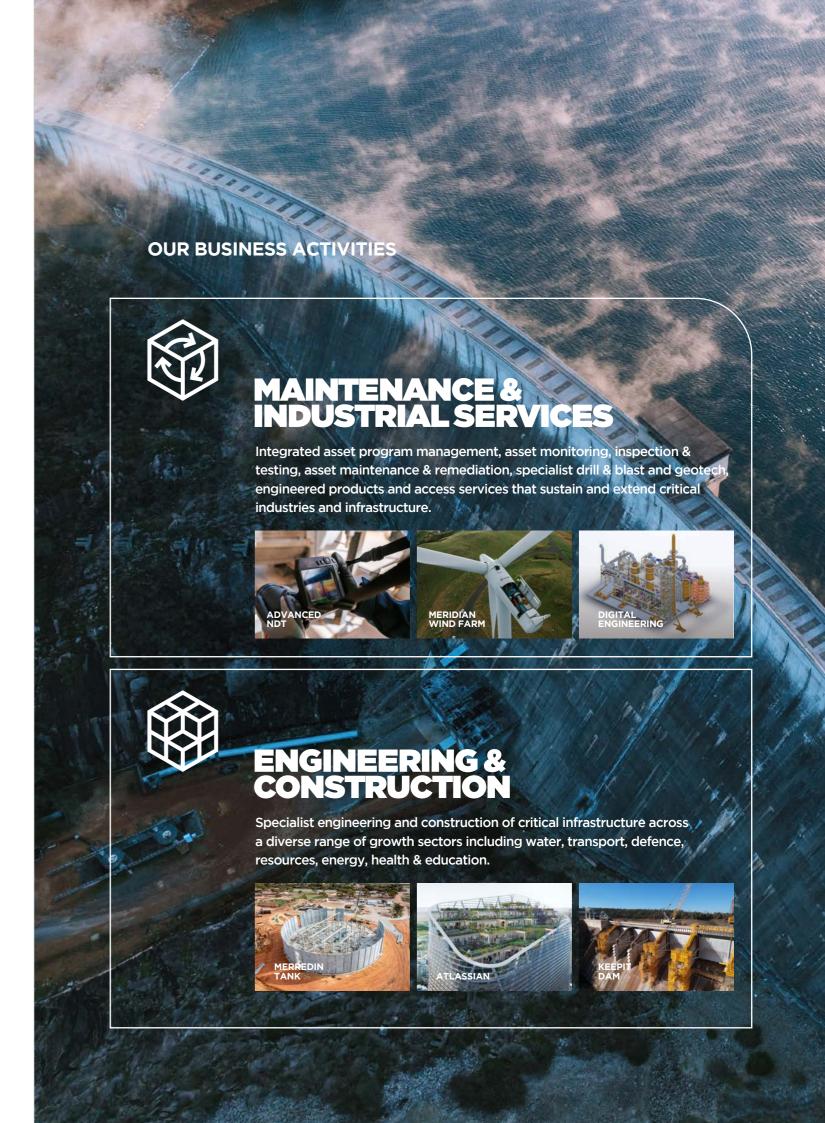
More information about SRG Global can obtained from our Annual Financial Report or recent ASX announcements — both of which can be found on our website.

OUR BUSINESS ACTIVITIES

Our two streams are overseen by our consolidated parent entity, SRG Global, which is responsible for the establishment of the group's strategic direction and governance.

 $^{(1)}$ This Statement does not include Diona Pty Ltd (Diona), an entity acquired by SRG Global on 2 September 2024.

MAKING THE COMPLEX SIMPLE





PEOPLE

Our people are the key to our success, and we recognise that a skilled and diverse workforce is a key to creating great outcomes. As of FY24, supported by a skilled workforce of 3,500 delivering complex projects across Australia and New Zealand.(2)

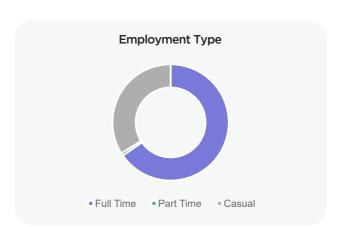
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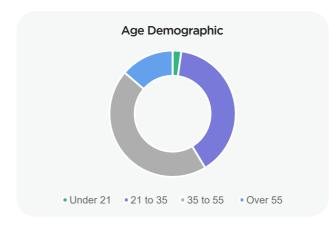
Our culture supports and values an inclusive and diverse workforce. We foster an environment that drives both different thinking and approaches to making the complex simple.

Our diversity encompasses a workforce from varied backgrounds who have unique skills, experience and views. They also differ by gender, culture, ethnicity and in other ways such as education, age, religious or cultural background, physical ability and family responsibility.

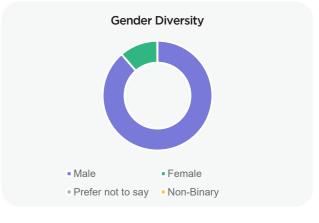
At SRG Global, we are committed at all levels to creating an environment that promotes teamwork through inclusion and the development of people based on their strengths.

Below you will find graphical summaries of some key diversity metrics within SRG Global. These items are measured, monitored and reported through to the Executive Leadership Team on a regular basis, ultimately used in underpinning strategy and actions around our diversity goals.









⁽²⁾ Estimated employee numbers are as of 30 June 2024 and do not incorporate employees from SRG Global's acquisition of Diona Pty Ltd which was not completed until 2 September 2024.

SUPPLY CHAIN

OVERVIEW

During FY24, our supply chain consisted of nearly 4,000 transacting suppliers, 97% of which are domiciled or were operational within Australia. Our mixture of suppliers includes direct wholesale manufacturers and third-party on-sellers.

Our expenditure is further categorised into three groups:

- **Goods, materials and consumables:** such as steel, cement and manufactured or fabricated products or otherwise used in the delivery of a project.
- **Services:** the delivery of manual or physical works, which may include the supply of equipment, labour or professional services and non-manual activities.
- **Equipment:** operational assets including mobile and static property, electrical and lighting, heavy mechanical and similar.





PROCUREMENT AND SOURCING

Our operations are often located in remote and regional locations and organically promote purchasing through local supply chains. We continue to focus on improving our local indigenous and social enterprise expenditure, which is embedded in our Procurement Policy implemented during FY24.

As we continue to grow, we are refining our purchasing practices toward a structured "Buy Local" process, focussed on maximising investment in the communities in which we operate.

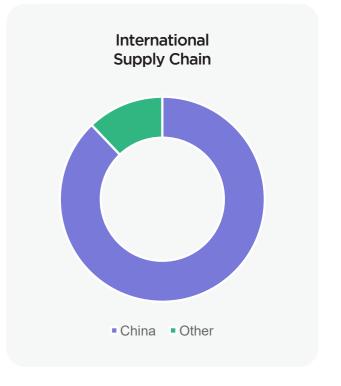
INTERNATIONAL SUPPLY CHAIN PROFILE

Our international supply chain spend for FY24 equated to approximately 8% of group expenditure, with a majority spend with a single territory in China (~88% of all international transactions).

To manage our direct exposure to modern slavery risks with foreign parties, we utilise an international prequalification procedure providing greater visibility on the controls and systems in place for direct engagement.

We recognise the use of our international prequalification only covers direct supplier engagements and that these suppliers may source raw goods, materials and services from third parties. To this end we continue to develop processes to improve our data collection on country of manufacture and modern slavery in unrelated third-party transactions.







SRG Global groups our exposure to modern slavery risks into two categories:



Direct Employment and Labour Sourcing

Our exposure to employment and labour sourcing exposure includes directly employed labour and third-party sourced labour.

As of FY24 we employed more than 3,500 people across a range of disciplines. All direct employment is governed through common law contracts and industrial awards, with third party sourced labour (via agencies) administered under contract.

We continue to monitor and review the effectiveness of our direct employment and labour sourcing arrangements through our Human Resources department.



External Supply Chain

SRG Global delivers specialist engineering and construction services across a number of key markets including water, transport, defense, resources, energy, health, education, specialist facades and complex civil projects.

Each of these projects requires large quantities of fabricated and raw materials, including steel, concrete and quarried products.

As identified in the overview of our supply chain, the purchase of goods through our indirect supply chain (second tier down) for the fabrication of finished products may be obtained (mined or manufactured) using forced labour.

We are continuing to take steps on improving our understanding and oversight of second, third and fourth tier supply chain exposures to modern slavery. More information on our actions can found on page 16.

Direct Employment and Labour Sourcing

Employee engagement is governed through a centralised Human Resources function. Our Human Resources team engages with all reporting entities supporting talent sourcing, recruitment and management of employee lifecycle.



1. Planning

Operations forecast their recruitment needs including estimated quantity, classifications and timing.

2. Approval

New employment requisitions are then submitted.

3. Sourcing

Human Resources develop a sourcing plan in conjunction with the hiring Business Unit.

4. Screening

Shortlisted candidates are screened, with consideration given to potential conflicts of interest. Candidates under the age of 18 require approval from SRG Global's Managing Director before screening occurs.

5. Appointment

On successful screening, Human Resources drafts a contract of employment. Contracts are then issued to successful candidates for review and execution.

6. Handove

The handover stage is designed to distinguish the recruitment procedure from its closely associated mobilisation, induction and onboarding procedure.

External Supply Chain

We consider our primary exposure to modern slavery risks existing in our external supply chain. As previously highlighted, 97% of our purchases are with Australian registered enterprises.

Notwithstanding our engagements with Australian registered enterprises, we acknowledge our

supply partners include providers of goods and materials which may be sourced from international jurisdictions. Examples of goods and services include certain construction machinery, manufactured facades, steel products and petroleum oils (including crude oils).



Our approach to addressing our exposure to modern slavery risks within our supply chain is built upon a process of:



Our workforce is the first line of defense in managing our exposure to modern slavery risks within our operations. During FY24 we released an updated training and awareness program targeted at increasing our workforce's awareness of what modern slavery is, signals that may raise concerns and how to raise a concern should they believe they have encountered anyone who may be subject to unlawful conditions.

During FY25, we will again run an internal program as well as releasing an external education package to our supply partners.



We have taken steps to improve the information we collect from our direct suppliers during onboarding to identify the controls in place to manage their direct exposure to modern slavery risks.

In addition to our onboarding, we are progressing with our external supply chain audit, targeting elevated risk industries and major spend supply partners.

Refer to the Supply Partner Risk Assessment for more information on our approach to risk identification and assessment.



Assess

In the event a notification of a potential breach is received, or an actual breach occurs, we will investigate the nature of the breach.

Our audit process is intended to assess the integrity of our supply partner frameworks to manage their exposures to modern slavery.

Where an audit returns a non-conformance, we will work with our supply partners to implement a remediation plan in accordance with step 4.

Refer to the Supply Partner Risk Assessment (refer page 18) for more information on our approach to risk identification and assessment.



We recognise that the prevention of modern slavery risks and prevalence is only achieved through a process of continuous improvement. This includes the systems and processes we utilise to educate, identify and assess our direct and indirect exposures to modern slavery risks.

RISK IDENTIFICATION AND ASSESSMENT

As education remains our first line of defence for in field identification of forced labour and modern slavery identification, our corporate governance framework includes the assessment of our broader pre-existing and newly engaged supply partners. Our identification and assessment framework is segregated into **Supply Partner Grouping** and **Risk Based Assessment**.

SUPPLY PARTNER GROUPING

SRG Global categorises its supply chain partners into two groups:

- Corporate Supply Partners: Third party suppliers who provide materials, goods and services to our corporate or office functions.
- Operational Supply Partners: Suppliers who provide goods, services and equipment for the delivery
 of a project.

SUPPLY PARTNER RISK ASSESSMENT

Following the initial grouping of our supply partners, we then group our supply chain by:



Location

Using the Global Slavery Index (GSI) we categorise the potential to which a supplier may be exposed to modern slavery in their operations and supply chain.



Scope

And assessment of exposure based on what SRG Global is purchasing from the supplier.



Spend

Our final category is based on the forecast and actual spend to a supplier.

The outcome of this assessment enables a ranking to be produced on the perceived or plausible risk of modern slavery arising from the engagement of a supplier. For suppliers who score highly in two of three categories, an engagement and assessment plan will be developed to review and assess the existing controls and processes of the supply partner to manage its own and downstream risks.

GOVERNANCE AND RESPONSIBILITIES

Modern slavery risks in our supply chain are overseen through a robust governance model aligned with our enterprise risk management framework.

SRG Global's Board of Directors (Board) retain oversight for the performance of our risk management systems and controls. Supporting the Board is our Executive Leadership Team who, led by our Managing Director, is responsible for the implementation of our framework.

The management of our exposure to modern slavery risks is administered through our operations to maximise the use of available resources. Administrative tools and resources are developed through our corporate governance framework, delivered at a group level.

Documents comprising of our governance framework relating to the management of modern slavery risks include:

Document

Description and application

Code of Conduct

Our Code of Conduct expresses the core values that drive our behaviour and aspirations. The key values underpinning the Code of Conduct are:

- Our actions must be governed by the highest standards of integrity and fairness.
- Our decisions must be made in accordance with the spirit and letter of applicable law.
- Our business must be conducted honestly and ethically, with our best skills and judgment, and for the benefit of customers, employees, shareholders, and the Company.

Supplier Code of Conduct

Introduced in 2022, our Supplier Code of Conduct builds upon our company Code of Conduct and establishes the minimum expectations of our supply chain partners when engaging with SRG Global. Central to the Supplier Code of Conduct is ensuring our supply partners meet their corporate responsibility including human rights and modern slavery compliance.

Corporate Policies

Including our Sustainability, Diversity and Inclusion, Health Safety and Quality, Respect@SRG and Ant-Bribery and Corruption. Each policy establishes our commitment to undertake our operations in an ethical and transparent way.





RESPONSIBLE PROCUREMENT

During FY24 we have implemented a new Procurement Policy, including accompanying standards, aligned with our Social Framework Objectives.

The objective of the policy is to define the framework of how sustainability is to be incorporated into the procurement decision making process for SRG Global. The intended outcome of this objective is to maximise the benefit to the communities in which we operate and the natural environment through:

- Identifying and increasing the use of environmentally preferable products based on recognised and qualified third-party certifications.
- Reducing the creation of landfill waste and minimising our waste footprint through recycling and the use of recyclable or circular materials.
- Reducing our environmental impact including greenhouse gas emissions and our overall carbon footprint.
- Increasing our utilisation of Indigenous and local suppliers in the communities where we operate and engagement to improve their own sustainable credentials.
- Proactively utilising manufacturers and supply partners that reduce environmental impacts of their production and distribution systems or services.
- Engaging with supply partners who meet the ethical standards of the Company as identified in our Supplier Code of Conduct; and
- Ensuring all procurement is conducted with integrity in a transparent and ethical manner, meeting the values of the Company.



EDUCATION AND AWARENESS

Supporting the implementation of our Procurement Policy was the roll out of an updated modern slavery education program targeting our workforce. The delivery of our training accounted for the diverse array of our operations, as both virtual and face to face toolbox presentations.

Key messages of the training package were awareness and how our workforce can notify of concerns.

During FY25 we intend to increase our downstream engagement with our supply partners through the release of an external education program and ancillary resources.



We are committed to continuously improving our approach to the identification and management of the risks of modern slavery within our operations and supply chains. As we continue to grow as a business, we are proactively implementing processes that deliver greater visibility and awareness.

In considering the effectiveness of our actions, we also account for the diversity of our operational footprint, available resources and breadth of our supply chain. Collectively, we engage with nearly 4,000 suppliers ranging from major enterprises to regional or local supplier groups.

Our focus for FY24 remained centred on process improvement. Key achievements include:

- The implementation of a procurement policy and related process that places ethical sourcing as a driver during sourcing.
- Increasing awareness and education through a revised modern slavery training package.
- Improving our supplier application procedure to increase the quality of information received and enabling greater transparency on modern slavery controls.

FY24 Action Progress Outcome

Implement a Sustainable Procurement Framework

Creation of the framework will align SRG Global's purchasing strategies to its long-term goal of ESG industry leadership and commitment to ethical procurement.

Central to the framework will be a Sustainable Procurement Policy and supporting procedures for our operations that structures our decision-making processes.

②

During FY24 we implemented an update to our procurement framework guided by a defined policy and decision principles

Assessment of our Remediation Framework

Complete a self-assessment of our modern slavery remediation process, including an update to our risk assessment and implement an improvement program for any identified at-risk gaps or processes.



We undertook a review of our Assessment and Remediation framework and developed an action plan to address areas of improvement. Outcomes will be implemented through FY25.

FY24 Action	Progress	Outcome	
Develop a scorecard To be provided as part of future reporting identifying key risk and assessment areas for our operations.	0	Work commenced on a supplier and country scorecard. The scorecard will form part our broader sustainability program.	
Supplier Portal Improvement Increase the delivery of information to our suppliers including resources to assess their exposure to Modern	\bigcirc	Mapping of the tools and resources to be provided was commenced during FY24. This action will carry through FY25.	
Slavery abuses within their own supply chains.		•	



In progress

Completed

In FY25 our focus will be applied to:

- Continue the development of our supply chain auditing program.
- Enhancing visibility over our supply chain using improved technology services including second and third tier sourcing.
- Completing our scorecard, including country and product risk profiling.
- Improving our supply chain education and resource delivery through our supplier portal.



CONSULTATION

SRG Global operates a centralised corporate governance and risk management framework (Governance Framework) which is overseen by our Board. The duties and powers of the Board are identified in the company's Board Charter which confers the role, functions, powers and duties reserved for the Board.

Our Governance Framework is inclusive of various policies, procedures, standards, tools and guidance materials that are applied to all controlled entities and operations. The Board delegates the management and oversight of the Governance Framework to SRG Global's Managing Director, who is then responsible for its administration across all operations via the Executive Leadership Team.

The development, implementation and execution of risk management strategies, including those specific to identify and address modern slavery risks, are uniform across all SRG Global operations.

Our 2024 Statement has been prepared with feedback from and consultation with the Managing Director and Executive Leadership Team, commercial representatives, project teams and related internal stakeholders.

DISCLAIMER

Information contained in this Statement is of a general nature only and may include forward looking statements, commentary or actions including updates to any previously advised or stated statements, commentary and actions. Unless otherwise required by law, SRG Global does not intend to provide periodical or updated commentary to any information contained within this Statement.

This Statement is not intended for use as material to be considered for potential or actual investment in SRG Global.

APPENDIX A

Schedule of entities covered by this Statement

REPORTING ENTITY	COUNTRY OF INCORPORATION	PRINCIPAL ACTIVITY	ABN	OWNERSHIP
SRG Global Limited	Australia	Corporate Services	81 104 662 259	100%
CONTROLLED COMPANIES				
SRG Global (Australia) Limited	Australia	Corporate Services	57 006 413 574	100%
SRG Global Corporate (Australia) Pty Ltd	Australia	Corporate Services	72 166 189 484	100%
SRG Global Building (Northern) Pty Ltd	Australia	Construction	87 076 604 281	100%
SRG Global Building (Southern) Pty Ltd	Australia	Construction	48 087 344 349	100%
SRG Global Building (Western) Pty Ltd	Australia	Construction	78 087 396 772	100%
SRG Global Services (Australia) Pty Ltd	Australia	Asset Services	40 111 102 240	100%
SRG Global Services (Western) Pty Ltd	Australia	Asset Services	71 145 854 360	100%
SRG Global Civil Pty Ltd	Australia	Construction	31 083 214 439	100%
SRG Global Mining (Australia) Pty Ltd	Australia	Mining Services	45 006 132 823	100%
SRG Global Products Pty Ltd	Australia	Construction	80 120 405 334	100%
SRG Global Structures (WA) Pty Ltd	Australia	Construction	41 008 946 469	100%
SRG Global CASC Formwork Pty Ltd	Australia	Construction	98 140 773 388	100%
SRG Global Structures (Vic) Pty Ltd	Australia	Construction	53 618 291 277	100%
SRG Global Assets Pty Ltd	Australia	Construction	85 104 662 213	100%
SRG Global Industrial Services Pty Ltd	Australia	Construction	81 128 921 344	100%
SRG Global Integrated Services Pty Ltd	Australia	Asset Services	86 604 010 639	100%
SRG Global Investments Pty Ltd	Australia	Construction	32 105 746 656	100%
SRG Global Facades (WA) Pty Ltd	Australia	Construction	25 604 493 174	100%
SRG Global Facades (Vic) Pty Ltd	Australia	Construction	47 606 869 014	100%
SRG Global Facades (NSW) Pty Ltd	Australia	Construction	97 602 257 929	100%
SRG Global Facades (Qld) Pty Ltd	Australia	Construction	87 602 258 257	100%
SRG Global Facades (Western) Pty Ltd	Australia	Construction	80 602 257 858	100%
SRG Global CASC Pty Ltd	Australia	Construction	98 140 773 388	100%
SRG Global Facades Pty Ltd	Australia	Construction	29 602 257 581	100%
SRG Global Facades (Western) Pty Ltd	Australia	Construction	80 602 257 858	100%
SRG Global Structures (Vic) Pty Ltd	Australia	Construction	53 618 291 277	100%
SRG Global Infrastructure Pty Ltd	Australia	Construction	78 089 434 220	100%
SRG Global Asset Care Pty Ltd	Australia	Asset Services	21 006 353 046	100%
SRG Employee Share Trust	Australia	Trust	60 202 572 201	100%



