



UCS GROUP

MODERN SLAVERY STATEMENT (ANTI-SLAVERY POLICY)

UCS Group – Business Management System	Effective Date: 25 th November 2019
Approved By: Stephen Ellich – Chief Executive Officer	Review Date: 22/4/2025 Review No. 2.1
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1. POLICY

1.1. Scope

The document applies equally to all UCS Group's (UCS) employees and stakeholders including UCS directors, subcontractors, consultants, suppliers and business partners.

1.2. Purpose

To provide information about the *Modern Slavery Act 2018 (Cth)* (MSA) reporting requirements by outlining UCS's actions to address modern slavery risks to our company and supply chains.

2. MODERN SLAVERY STATEMENT

2.1 Introduction

UCS is committed to limiting the risk of modern slavery occurring within our business, including the risk of infiltration of our supply chains or any other business relationship.

UCS opposes all forms of slavery and forced labour in our operations and the operations of our suppliers. Our policy and governance approach to modern slavery is guided by our Code of Conduct.

UCS will only do business with organisations who fully comply with the MSA, or those who are taking verifiable steps towards relevant MSA compliance.

2.2 What is Modern Slavery?

Modern slavery can take many forms covering a range of exploitative practices including:

- **human trafficking:** involves arranging or facilitating the travel of another with a view to exploiting them
- **slavery:** where ownership is exercised over an individual
- **forced labour:** all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty
- **child labour:** whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development
- **Servitude:** involves the obligation to provide service imposed by coercion.

All forms of modern slavery have in common, the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

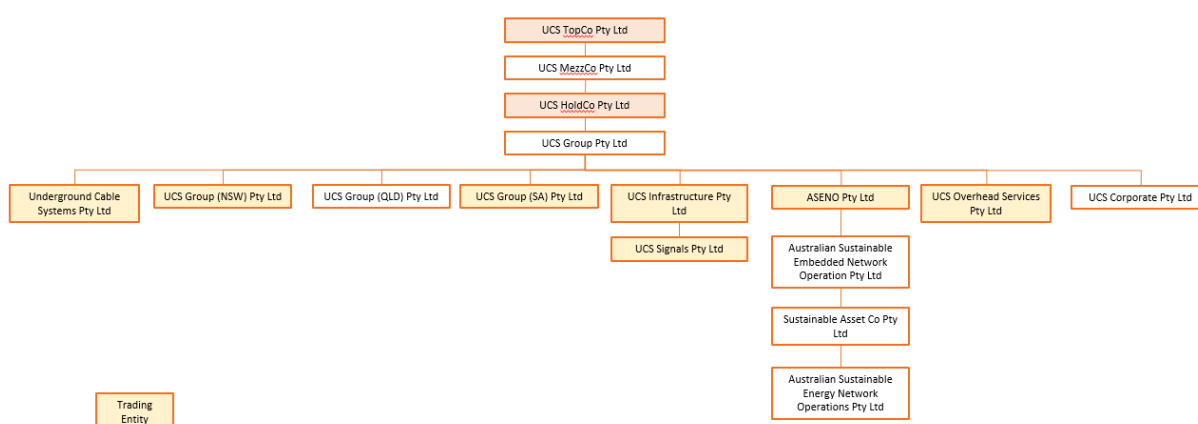
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Tackling modern slavery requires all stakeholders to play a part and remain vigilant to the risk in all aspect of UCS business and business relationships.

3. Structure, operations and supply chains

3.1 Organisational Structure

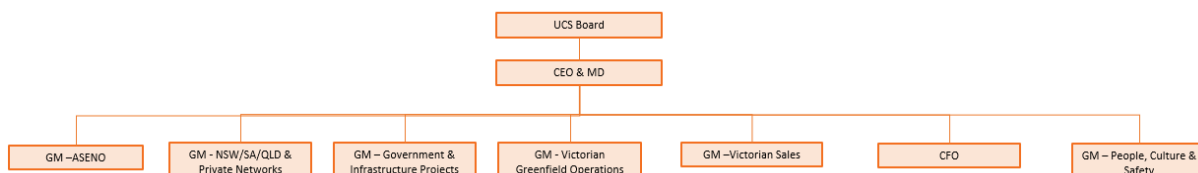
UCS comprises of several entities, which share common ownership and in many instances leadership teams. Not all entities listed are employing or contracting entities, however their details are listed below to demonstrate the group structure.



3.2 Management Structure

UCS is managed by a board of directors, which oversees all wholly owned businesses. UCS Overhead Services, of which UCS has a controlling majority ownership, is overseen by a separate board, which comprise of other ownership partners.

Day to day management is overseen by an executive team, with operational and technical management teams supporting individual business lines. Corporate service functions such as Finance, Technology, People, Culture and Safety, and Sales are all centrally managed.



3.3 Corporate Governance feedback diagram



3.4 Operations

UCS operates under several banners as displayed under 3.1. We work in several sectors including design and construction of underground power infrastructure, installation of traffic signals, construction and maintenance of overhead electrical assets, completion of public and private electrical works and design and management of green energy networks.

The registered office for UCS is 12 Deborah Street, Bendigo, Victoria 3550. Our currently employee count is 222 at the end of November 2024.

UCS operates out of several client sites based on the nature of our work. The following locations reflect our current depot structure:

- UCS Bendigo – 12 Deborah Street, Bendigo, Victoria 3550
- UCS Pakenham – 111 National Avenue, Pakenham, Victoria 3810
- UCS Truganina – 29-31 Efficient Drive, Truganina, Victoria 3029
- UCS Sydney – 9 Mount Erin Road, Campbelltown, NSW, 2560
- UCS Adelaide – 28 Stebonheath Road, Edinburgh North, SA 5113

UCS’ Operations have very limited risk of modern slavery breaches as all members of staff are employed on contracts of employment, which are underpinned by either an Award or Enterprise agreement. Compliance with these instruments is assessed through internal reviews and regular external auditing to ensure compliance with wages and conditions. To date there have been no inconsistencies identified and we are confident that employees are receiving all of their entitlements. The most recent external audit of wages and conditions was conducted by our external financial auditors in 2024. UCS do not engage any employees under the age of 18 years. UCS’ Subcontractor workforces have similar structures and confirm their compliance to MSA requirements as part of their engagement terms with UCS.

3.5 Supply Chains

The supply chain for UCS is varied based upon the broad nature of works we perform. Significant products include cable, conduits, light poles, traffic signals, cable jointing kits, electrical consumables, and kiosks. Professional services such as design, cleaning, legal and taxation advisory are also performed in its majority by third parties.

A majority of our items are purchased locally through third party suppliers, however a significant proportion of these products are sourced from overseas manufacturers including cable, kiosks, batteries, solar panels and light poles. Several of these suppliers perform assembly, quality assurance and cosmetic changes to the products to suit the local market when they are in the country. The countries of origin for these items include China, France, USA and other Asian countries. As many of these products, specifically cables, kiosks, and light poles, are procured based upon mandated network requirements we have very little influence in the selection of these providers. However, given the nature of these products and their countries of origin, we acknowledge that there may be instances where MSA requirements may be potentially being breached in the sourcing, manufacturing and assembly of items, particularly items sourced from offshore. To that extent we have made enquiries with our core suppliers to validate and confirm appropriate measures are in place to minimise any MSA risks. Thus far all have confirmed there are no concerns and many now provide an increased level of paperwork with deliveries which includes details of their MSA compliance. We believe this is adequate and effective given our supply chain. These steps are validated on an annual basis as part of internal compliance auditing.

Supplier engagement levels are varied based on the nature and extent of works the supplier provides for each construction solution. All suppliers are required to follow standard on-boarding procedures to ensure conformance with company policies and be operating in compliance with all Australian laws and regulations, this includes assurances regarding compliance with MSA requirements.

4. Risk Management

Good corporate governance is critical to the long term, sustainable success of UCS through the development of policies and processes to address modern slavery risks and providing training for staff about modern slavery.

The UCS Board has ultimate responsibility for the oversight and approval of all risk management including human rights and modern slavery related risks.

UCS has implemented the following measures:

- Conduct risk assessments to determine which parts of the business and which supply chains are most at risk from modern slavery so effects can be focused on the areas that are most at risk;
- Where appropriate, as informed by the risk assessment, UCS have engaged directly with subcontractors and or suppliers in respect of this Anti-Slavery Policy in order to gain a further understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses;
- Identification of Tier 1 suppliers within UCS Group's supply chain, inclusive of their location and/or structure within the identified supply chain;

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- Our contractual documentation incorporates specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour, and the use of child labour in line with this policy;
- Provisions for our contracted suppliers and subcontractors to hold their own suppliers and subcontractors to the same standards;
- Employees have received relevant training for their role on the Anti-Slavery Policy and any supporting processes applicable for their role;
- Regular review of the efficacy of risk management measures to ensure these measures remain effective and relevant.

4.1 Remediation

Good corporate governance is critical to the long term, sustainable success of UCS Group. It contributes to value creation and positive outcomes for all stakeholders. Good governance is embedded throughout UCS Group and is the collective responsibility of the Board and all levels of management. UCS Group seeks to adopt and practice leading contemporary governance standards and to apply these in a manner consistent with its culture and values.

Consistent with the Company's risk management approach to human rights more generally, the risk of modern slavery in UCS Group's organisation and supply chain is assessed within UCS Group's corporate-wide risk management framework. Given the nature of this risk, the key focus of senior management is working collaboratively with UCS Group's suppliers to ensure that expectations and standards are understood and the potential exposure to human rights risk is minimised.

Remedial action for any breach of the Anti-Slavery Policy may include:

- Requesting certain activities to stop or, introducing a grievance mechanism providing suppliers, employees or the community an easy avenue to raise modern slavery concerns;
- UCS Group has a number of mechanisms for employees and third parties to anonymously report suspected or actual illegal activity or Company Policy breaches, such as through the Company's Code of Conduct and or Whistle-blower Policy. Employees and third parties are able to utilise the whistle-blower system by phone or email in order to reach the appropriate company officer. Each whistle-blower disclosure received is investigated and reported to the Chief Executive Officer. The instances and outcomes of the whistle-blower investigations are reported to the Board.
- UCS Group's grievance procedures ensure all grievances are managed in a systematic, fair, timely and transparent manner.
- Training and educating and, assessing the effectiveness of that training and education, of modern slavery requirements;
- Terminating any contractual arrangements;
- Disciplinary action.

We will continue to monitor the effectiveness of these controls on an ongoing basis. This will involve regular communication with our suppliers and providers to declare any changes to

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their situations. We will also conduct debriefs with internal staff post identification of any potential breaches, to identify and implement improvements in policy and procedure. Further to this we will also conduct an internal review of our engagement processes for new suppliers and conduct randomised reviews of existing suppliers for conformance. Any identified procedural improvements will be implemented and communicated both internally and with the relevant suppliers.

5. Consultation

In the preparation of this Statement, UCS has taken steps to engage with all entities within the group on the modern slavery risks in its business, operations, and supply chains so that any risks can be identified, assessed and addressed appropriately.

This Statement has been approved by the Board of UCS.



David Plumridge
Chairman
UCS Group

6. References

- UCS Code of Conduct (Behaviours and Ethics Policy and Procedure)
- [Modern Slavery Act 2018 \(Cth\)](#)

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