



# 2024 MODERN SLAVERY STATEMENT

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## ABOUT THIS STATEMENT

This Modern Slavery Statement (Statement) has been prepared in accordance with the Australian Modern Slavery Act 2018 (Cth). It describes the risk of modern slavery in our operations and supply chains during the period 1 July 2023 to 30 June 2024 (the Reporting Period). It also details the steps that the business has taken to minimise the risks of modern slavery and explains the effectiveness of those steps.

RSGx Holdings Pty Ltd, the parent company, and its related entities (collectively, RSGx) have prepared this Statement as a joint statement in compliance with the Modern Slavery Act 2018 (Cth) (Modern Slavery Act). This Statement covers RSGx Holdings Pty Ltd (the holding company in the RSGx group) and all its controlled entities, as defined under the Modern Slavery Act, being:

- ✓ Resource Services x Pty Ltd
- ✓ Resource Services Group E&I Pty Ltd
- ✓ RSGx Engineering Pty Ltd
- ✓ Allied Power Pty Ltd
- ✓ Itech Corporation Pty Ltd
- ✓ Baldja RKW Pty Ltd
- ✓ RSG Assets Pty Ltd
- ✓ CNF iTech Pty Ltd

Our mission is to be a trusted partner providing innovative MSE construction and engineering solutions while delivering positive outcomes for our clients, employees and community - ensuring projects are delivered safely, on time and efficiently.



The core values of RSGx are reflected in the synonym "CLIC", meaning "Care | Lead | Integrity | Commit".

C

**Care**

We respond to the needs of communities and clients with whom we engage, whilst supporting our employees' aspirations

L

**Lead**

We encourage innovation, leverage technology and use industry learnings to continuously improve the way in which we deliver

I

**Integrity**

We do what we say we will do and support it by providing clear visibility to our partners, clients and employees

C

**Commit**

We undertake our works with an attitude of willingness and enthusiasm to deliver on our vision, mission and goals

Our approach is to work in synchronisation with our suppliers, clients and our other stakeholders to operate ethically and in a manner that minimises the risks of modern slavery in our operations and supply chains.

## CONSULTATION AND ENGAGEMENT

RSGx is an integrated group, with policies, systems and procedures that apply uniformly right across the business. RSGx is governed by a Board of Directors, supported by an executive leadership team and senior management team (comprising other managers and team leaders).

Accordingly, RSGx adopts a group-wide approach to managing modern slavery risk within its operations and supply chain, driven from the top down by the Board of Directors of RSGx Holdings Pty Ltd. The policies, systems and procedures of RSGx apply to all entities within the group.

During the Reporting Period senior leaders of the controlled entities and the centralised functions providing services for those controlled entities were consulted on the approach being taken to mitigate modern slavery risks. This included discussion on the various policies and procedures identifying and reporting modern slavery risks, the effectiveness of controls.

Representatives of Human Resource, Legal and Procurement functions instrumental in developing the policies, procedures and controls that mitigate against modern slavery risk that operate within the controlled entities have informed and contributed to the development of this Statement. Following these inputs the Legal function finalised the content of this Statement, which was then provided to the Board of Directors for approval.



## OUR STRUCTURE AND OPERATIONS

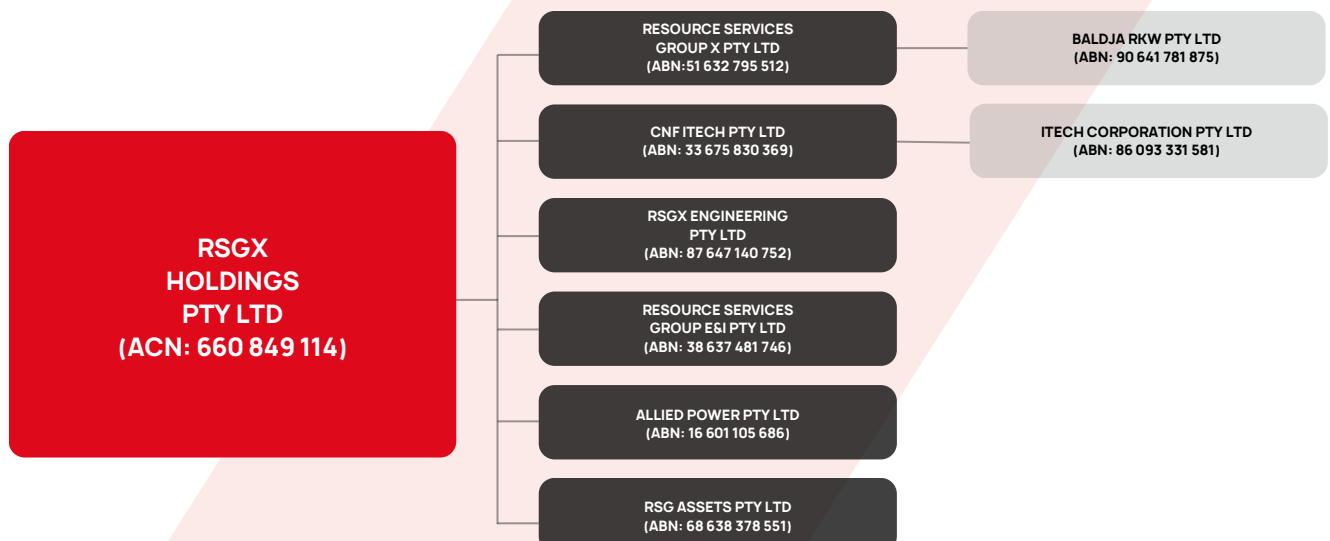
### Our Structure

RSGx Holdings Pty Ltd and its controlled entities, comprise the following companies within the group:

- ✓ Resource Services Group x Pty Ltd
- ✓ Resource Services Group E&I Pty Ltd
- ✓ RSGx Engineering Pty Ltd
- ✓ Allied Power Pty Ltd
- ✓ Itech Corporation Pty Ltd
- ✓ Baldja RkW Pty Ltd
- ✓ RSG Assets Pty Ltd
- ✓ CNF iTech Pty Ltd

Noted: Allied Power Pty Ltd, and Itech Corporation Pty Ltd were acquired by RSGx Holdings Pty Ltd in the later half of the Reporting Period and although they continued to operate as separate operational entities they transitioned across to operate under the centralised systems, policies, and procedures of RSGx.

Our current corporate structure is set out below:





## Our Operations

RSGx is a provider of innovative, multidisciplinary and integrated mechanical and electrical solutions in the transport infrastructure, oil and gas, resource and minerals, renewables, transmission and distribution and water industries in Australia. RSGx provides a suite of service solutions to our valued partners, throughout the project management lifecycle from front end engineering and design, construction, completions, commissioning and start-up, through to maintenance, occupations and shutdowns.

RSGx operates nationally, with its corporate head office in Rydalmere, New South Wales, and with other regional offices throughout Australia.

### APAC Locations >

#### Australian Head Office

Unit D, 10-16 South Street  
Rydalmere NSW 2116

#### Regional Offices

Perth WA  
Port Hedland WA  
Brisbane QLD  
Darwin NT  
Melbourne VIC  
Cooma NSW



All construction contracts entered into with clients and performed by RSGx are entered into by its operating entities, Resource Services Group x Pty Ltd, Resource Services Group E&I Pty Ltd, Allied Power Pty Ltd, Itech Corporation Pty Ltd, RSG Assets Pty Ltd, CNF iTech Pty Ltd, and Baldja RKW Pty Ltd.

## Our Employees

On 30 June 2024, RSGx's workforce comprised of 471 employees. 100% of our workforce is based in Australia, and in self-performing works, are employed on permanent, fixed term, part time or casual employment agreements and/or under enterprise bargaining agreements. All employment terms and conditions conform with Fair Works Act and National Employment Standards, providing for appropriate hours of work remuneration and leave entitlements.

RSGx also utilises labour from organisations that specialise in the provision of labour hire services under labour hire agreements that comply with the relevant regulations. These arrangements significantly reduce RSGx's modern slavery exposure.

## Our Subcontractors

For works that are subcontracted, the subcontracts entered into are with known Australian-based businesses. RSGx has approximately thirty subcontractors working on its projects at any one time and most of these contracts are with small to medium enterprises. Some of these subcontractors have their own subcontractors and suppliers performing key elements of the work, all of whom are required under the terms of the subcontracts entered into, to be pre-approved by RSGx.

During the reporting period, RSGx performed all its projects within Australia, but with a degree of technical and administrative support from services providers located in other jurisdictions, namely Vietnam. Again, the contracts for this technical and administrative support are focused on a few identified individuals, based on standard forms of contract used here in Australia, meeting or exceeding state and federal standards. The contracts and working relationships are tightly controlled and administered from here in Australia, significantly reducing the modern slavery risks.

People and a respect for human rights is at the core of who we are at RSGx. It is that respect that extends to those who work for and represent our customers, suppliers, the indigenous community and to all communities which comprise part of our ecosystem.

Our commitment under the Modern Slavery Act is ingrained, identifying the risks in our entire ecosystem; beyond just the risks to our immediate operations to encompass the extended supply chains that delivers much of the value that we provide.

Significant investment has been made into our people, systems, policies, processes and controls. RSGx is committed to sourcing goods and services from only those suppliers who share a similar ongoing commitment and respect for ethical business practices and the rights of workers.

## OUR SUPPLY CHAIN & MODERN SLAVERY RISKS

Construction is considered a high-risk industry under the Modern Slavery Act as it is based on the provision of labour, both self-performed and subcontracted and the delivery of components and materials sourced through relatively complex supply chains.

RSGx either self-performs, utilises subcontractors, or uses a mix of the two to perform its project works.

Where RSGx outsources work to subcontractors that have their own downstream subcontractors to perform scopes of work, there can be a perceived lack of transparency on the terms and conditions of those subcontracts. RSGx manages that exposure by requiring subcontracts to be with pre-approved subcontractors and suppliers and to include appropriate Modern Slavery provisions within them.

Goods and services including plant and equipment hire, professional services, and various components and materials are primarily sourced through well-known Australian-based businesses, well established brands meeting stringent quality requirements, with a mix of local and offshore manufacturing facilities.

There are however various components and materials which although sourced in Australia have been manufactured or assembled and therefore originate overseas. This includes distribution boards, transformers, electronics (such as meters and switch boards) and cable. These components are purchased through reputable Australian wholesale and retail businesses, that sell reputable global brands.



RSGx is aware of the additional risks of an extended supply chain into other jurisdictions, the sourcing of raw materials, manufacture, transportation, whole-sale and retail. RSGx is particularly cognisant of jurisdictions where modern slavery is an elevated risk and monitors the 'Department of Foreign Affairs and Trade' website for additional information on these risks. Further due diligence includes country of origin, financial reports, other supplier assessment criteria.

RSGx uses accounting and project management systems to manage its project performance and there is always a risk that someone in the extended supply chain that brings the benefits of these systems to RSGx is exposed to modern slavery risks. To offset the risk the systems are provided by reputable companies and brands.

## OUR GOVERNANCE FRAMEWORK

The executive leadership team is responsible for developing and approving the groups environmental, social and governance strategy which has at its foundation the prevention of modern slavery and the protection of human rights. Delegated executives within the team are responsible for setting the expectations, overseeing modern slavery, governance and risk.

The leadership team is supported by the Human Resource, Legal and Procurement functions instrumental in developing the policies, procedures and controls that mitigate against modern slavery risk within our business.

The Legal function in particular is responsible for the efficacy of the Legal Compliance Framework, across the RSGx group, implementing modern slavery compliance materials and updates, collating the outputs that measure their effectiveness, keeping the executive leadership team which meets weekly, fully appraised.

### Policies & Procedures

RSGx's Legal Compliance Framework includes a number of policies and procedures that combine to manage Modern Slavery risk:

- ✔ **Modern Slavery Human Trafficking Policy:** a policy aligned with the requirements of the Modern Slavery Act that applies to all employees, suppliers and subcontractors of RSGx. It establishes our commitment to eliminate modern slavery, and human trafficking, and summarises the controls in place to achieve this.
- ✔ **Human Resources Policies:** policies that govern the employment relationships with our employees and some subcontractors. These policies are designed to create a positive and transparent work environment based on fairness and compliance. They cover specific elements such as recruitment, performance management, grievance management, training and development and regulate entitlements around leave, flexible working arrangements, and employee benefits.
- ✔ **Competition and Consumer Policy:** a policy that regulates and promotes fair trading between competitors while also ensuring consumers are treated fairly. Its primary objective is to prevent unfair business practices such as misleading and deceptive conduct and false and misleading representations. This policy feeds into RSGx's minimum expectations for ethical behaviours towards and from our suppliers ensuring in trade and commerce that the parties do not make false, misleading or deceptive comments or act in a manner that is likely to mislead or deceive.
- ✔ **Whistleblower Policy:** concerns about modern slavery in our operations and supply chain are reportable through our Whistleblower Policy, a tool that facilitates the disclosure of any wrongdoing or misconduct in our working environment, and to ensure that whistleblowers are protected and supported. Internal processes have been established to ensure disclosed matters are quickly investigated and resolved, in an independent and anonymous manner.

Compliance with these policies is subject to regular audit and reinforcement as part of the framework. These policies in combination with our Code of Business Conduct and Ethical Sourcing Policies collectively establish the minimum standards of operation with regard to managing Modern Slavery risks in our organisation, ensuring proper treatment of workers, workplace safety, fair pay and employment conditions.

### **Ethical Sourcing**

The key principles contained within these 'ethical sourcing policies' are extended to pre-qualification disciplines that have been adopted by the business to assess and approve new subcontractors and suppliers. This includes a supplier pre-qualification questionnaire that contains specific questions regarding the degree to which the supplier and its supply chain complies with the modern slavery requirements.

The pre-qualification questionnaire contains questions in relation to the supplier's or subcontractor's modern slavery policies and procedures and identified modern slavery risk factors. Only once evaluated against set criteria and approved as compliant, are subcontractors and suppliers included in the Approved Vendor Register.

Our standard form supply agreements and subcontracts contain obligations to comply with national laws, principles of fair competition and trading and international conventions to protect the interests of employees. This requires suppliers and subcontractors to have procedures in place to support compliance with modern slavery laws within their supply chains, and to notify us of identified modern slavery risks.

Subcontractors and Suppliers on the Approved Vendor Register are subject to periodic reviews and reassessments to determine the extent to which they have continued to comply with their modern slavery obligations - ensuring that no Modern Slavery compliance issues have emanated since the date of the original approval.

This helps to achieve better supplier cooperation and alignment, facilitating greater supply chain integration and long-term supply chain relationships, with partners that share our ethics and values.

**1**

Enhancing our procurement pre-qualification process for identifying/ onboarding new suppliers and subcontractors, ensuring adequate provision for modern slavery disclosures

**2**

Reviewing our standard terms of supply and subcontract to strengthen the warranties and obligations with regard to modern slavery compliance

**3**

Delivering targeted training to 'Procurement Coordinators' to ensure they understand the prequalification process (policies, forms and procedures)

**4**

Reviewing subcontractors and suppliers listed on the Approved Vendor Register to determine the extent to which disclosures are up to date, and a timetable for further audits.

**5**

Strengthening the evaluation process to ensure timeliness and greater accuracy in review and assessment.



## HR Controls

RSGx protects the labour standards and human rights of its employees through its human resources policies and recruitment practices.

Most of our employees are employed directly, with their employment terms and conditions set out in employment contracts governed by Australian employment laws and relevant awards. All recruitment is managed through a centralised recruitment function, which includes ensuring that candidates' are appropriately vetted prior to offers being made, successful candidates being onboarded.

Remuneration for all employees is reviewed annually. All permanent employees are given the opportunity to participate in an engagement survey at least once every year. This complements the existing internal and external grievance reporting mechanisms in place in Australia and the Whistleblower Policy.

## Training & Reinforcement

RSGx provides a mix of training through direct face to face presentations and online, as part of our Legal Compliance Framework. This includes modern slavery awareness helping employees to identify and manage modern slavery risks. This is supplemented by training specific to other policies and procedures including our Whistleblower Policy. Our comprehensive policies, training and grievance reporting processes combined with ongoing monitoring and auditing of compliance mean that the risk of modern slavery within our operations is substantially reduced.

Over the Reporting Period RSGx has made significant progress in implementing and improving the policies and procedures to assist in addressing modern slavery risks within our operations and supply chains.

This entailed a review of its recruitment procedures including onboarding through its labour hire partners, to ensure consistency with the Modern Slavery Act. This included a review of the internal whistle-blower processes to determine the extent to which they remained fit-for-purpose to highlight modern slavery non-compliances.

In addition, the front-end processes that allow for onboarding of new suppliers, and associated documentation was reviewed. This required greater engagement with our 'Procurement Coordinators' and with our suppliers on modern slavery issues.



As a result, RSGx has performed a deeper dive into:

- ✓ The detail of the disclosures made in the pre-qualification questionnaires used to onboard new suppliers, the adequacy of those disclosures;
- ✓ Our pre-qualification evaluation criteria for the pre-qualification questionnaires and provided guidelines to 'Procurement Coordinators' to improve that process;
- ✓ Its existing suppliers to evaluate the extent to which they still comply with their modern slavery obligations, and to develop a process for more regular audits; and

Following these reviews the following actions were taken during the Reporting Period to improve our processes:

**1**

Enhancing our procurement pre-qualification process for identifying/ onboarding new suppliers and subcontractors, ensuring adequate provision for modern slavery disclosures

**2**

Reviewing our standard terms of supply and subcontract to strengthen the warranties and obligations with regard to modern slavery compliance

**3**

Delivering targeted training to 'Procurement Coordinators' to ensure they understand the prequalification process (policies, forms and procedures)

**4**

Reviewing subcontractors and suppliers listed on the Approved Vendor Register to determine the extent to which disclosures are up to date, and a timetable for further audits

**5**

Strengthening the evaluation process to ensure timeliness and greater accuracy in review and assessment

## EFFECTIVENESS OF ACTIONS

The analysis of the results of our actions during the Reporting Period conclude that the risk of modern slavery has remained low:



- ✔ In response to our audit of existing suppliers during the Reporting Period, none of them have raised any concerns regarding modern slavery compliance.
- ✔ None of the new suppliers responding to our pre-approval or pre-qualification questionnaires during the Reporting Period have raised modern slavery risk concerns.
- ✔ In evaluating new suppliers, our 'Procurement Coordinators' have restricted approvals during the Reporting Period to those suppliers who are well-known Australian-based businesses sourcing reputable brands.
- ✔ Following a refresh of our messaging to the business on the Whistleblower Policy, no issues regarding modern slavery risks were either reported or raised as a grievance during the Reporting Period.
- ✔ Finally, in consulting with our 'Procurement Coordinators' during the Reporting Period on the effectiveness of our modern slavery processes no issues of supplier non-compliance were raised.

RSGx relies on the accuracy of the disclosures made by its supply chain participants to confirm modern slavery compliance positions particularly in relation to materials inputs at the extremities of the supply chain. During the Reporting Period RSGx has had no reason to question the accuracy of these disclosures.

In summary, RSGx is of the belief that adherence to our policies and procedures have minimised the risks of modern slavery across our supply chains. In our never-ending pursuit for excellence further changes have been identified and recommended for 2025, changes we are sure will continue to strengthen RSGx's ability to detect and respond to incidents of modern slavery in our operations and supply chains.

## IMPROVEMENTS FOR 2025

In 2025 greater emphasis will be placed on imbedding core disciplines, including:

- ✔ Enhancing our policies and processes in our professional services and engineering practices, imbedding compliance through customised training
- ✔ Developing risk maps based on product category and spend considered higher risk, areas of particular focus for modern slavery
- ✔ Developing appropriate thresholds for determining modern slavery risks and exposures based on differentiating higher risk supply categories from lower risk categories, as revealed through the risk maps
- ✔ Completing the full transition of the newly acquired operating entities into the procurement system, policies and procedures
- ✔ Training our Procurement Coordinators' and project teams to conduct traceability studies on active suppliers identified as high-risk, through the risk maps

## OUR ONGOING COMMITMENT

It is anticipated that these further actions will extend the reach of our analysis and remove the degree of reliance we currently have on supply chain disclosures validating modern slavery compliance. These actions will also strengthen our due diligence processes in identifying and mitigating the risk of modern slavery.

In addition, RSGx is exploring various procurement platforms that will assist in performing more advanced category management and risk mapping initiatives. This reflects on our objective to improve our systems and processes to identify, prevent, mitigate and remedy actual or potential human rights infringements of modern slavery.

RSGx will also take further steps to encourage its employees to report or raise concerns under the Whistleblower Policy, including concerns they may have regarding modern slavery compliance. Reports are able to be made in an anonymous fashion and investigations are conducted in a fair and confidential manner.

This Statement has been made pursuant to the Modern Slavery Act 2018 (Cth) covering the reporting period 1 July 2023 to 30 June 2024, and was approved by the principal governing body, of the parent entity, the RSGx Holdings Pty Ltd Board of Directors on 21st of November 2024.



**Niall Conlon**

Chief Executive Officer, Global  
RSGx Holdings Pty Ltd  
22nd of November 2024



## Contact us

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🌐 **Website** [www.rsgx.com](http://www.rsgx.com)

### Resource Services Group X Pty Ltd

Electrical License NSW: 341367C | Electrical License QLD: 86817 | Electrical License VIC: 30875  
Electrical License SA: PGE 299620 | Electrical License WA: EC14072 | Electrical License NT: C 4093  
Electrical License TAS: 785786898

### Resource Services Group E&I Pty Ltd

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