



# Modern Slavery Statement

EPEC-HS-PY-0002  
Updated FY24-25 Submission Dec 2025



# Introduction

EPEC Group is committed to respecting internationally recognised human rights laws and standards. We honour this commitment by adhering to EPEC’s values and standards, and by ensuring that all operations and interactions with suppliers and the community are conducted safely, lawfully and respectfully. This Modern Slavery Statement outlines the actions taken by EPEC Group and its controlled entities to identify, assess and address modern slavery risks, in accordance with the Modern Slavery Act 2018 (Cth).

EPEC Group operates under a single integrated management system (IMS), and this statement covers all entities within the Group, including:

- EPEC Group Pty Ltd  
(ACN 634 234 129)
- EPEC Projects Pty Ltd  
(ACN 640 363 686)
- EPEC Engineering Pty Ltd  
(ACN 640 363 739)
- EPEC Operations Pty Ltd  
(ACN 688 638 664)
- EPEC Technologies Pty Ltd  
(ACN 652 654 692)

The statement clearly outlines how EPEC Group consulted across its controlled entities, including EPEC Projects Pty Ltd, EPEC Engineering Pty Ltd, EPEC Operations Pty Ltd and EPEC Technologies Pty Ltd, through Executive Leadership Team (ELT) discussions and alignment of procurement, supplier controls, and governance systems. All entities operate under shared policies, systems and decision-making, and none maintain separate or independent supplier or procurement processes.



Within our direct operations, the risk of modern slavery is considered low due to our Australian-based workforce, direct employment model, and compliance with Australian labour laws. However, we recognise potential risks within parts of our supply chain where materials, equipment or subcontracted manufacturing originate from higher-risk regions or industries.

During this reporting period, EPEC Group:

- Conducted a modern slavery risk assessment across operations and procurement activities.
- Included modern slavery criteria in supplier prequalification and onboarding processes.
- Embedded modern slavery awareness into IMS training delivered across business units.
- Initiated a confidential reporting channel via [communications@epcgroupp.com.au](mailto:communications@epcgroupp.com.au), accessible to employees, subcontractors and suppliers.
- Ensured consultation and alignment across all entities through ELT governance and shared procurement and supplier oversight.

EPEC Group remains committed to continuous improvement and will continue strengthening supplier engagement, training and monitoring processes to further mitigate the risk of modern slavery across our operations and supply chain.



# Structure, Operations and Entities

## Corporate Structure

EPEC Group Pty Ltd (ACN 634 234 129) is the parent company of an Australian-based group that delivers electrical infrastructure, grid connection and construction services to the energy and utilities sector. The Group operates under a unified governance structure and a single Integrated Management System (IMS), which governs procurement, supplier onboarding, risk management, employment practices and compliance across all entities.

This Modern Slavery Statement applies to the following entities owned and controlled by EPEC Group:

- EPEC Projects Pty Ltd (ACN 640 363 686)
- EPEC Engineering Pty Ltd (ACN 640 363 739)
- EPEC Operations Pty Ltd (ACN 688 638 664) — established to deliver operational support and field services for projects and maintenance activities
- EPEC Technologies Pty Ltd (ACN 652 654 692).

All entities share centralised corporate services, including procurement and contracts, finance, human resources, HSEQ, governance and legal compliance. None of the controlled entities operate standalone supplier processes or independent procurement systems.

# Business Operations



EPEC Group delivers specialised services across high-voltage (HV) infrastructure, substation design and construction, battery energy storage systems (BESS), testing and commissioning, civil and electrical balance-of-plant works, and grid connection services. These services are delivered across multiple Australian states and territories.

## Core operational activities include:

- Design, engineering and construction of HV substations and grid connections
- Installation and commissioning of BESS, transmission and distribution assets
- Procurement, logistics and contractor management
- Field operations, maintenance and support through EPEC Operations Pty Ltd
- Project management, compliance and commercial oversight

EPEC Group's corporate office is located in Brisbane, Queensland, with project teams deployed nationwide.

## Workforce

EPEC Group employs a predominantly Australian-based workforce comprising permanent employees, fixed-term staff and specialist contractors. All personnel are engaged under written contracts compliant with Australian labour laws and industrial awards. Employment practices across all entities include right-to-work checks, background verification, structured inductions and access to grievance and reporting mechanisms.



# Supply Chain Overview



EPEC Group employs a predominantly Australian-based workforce comprising permanent employees, fixed-term staff and specialist contractors. All personnel are engaged under written contracts compliant with Australian labour laws and industrial awards. Employment practices across all entities include right-to-work checks, background verification, structured inductions and access to grievance and reporting mechanisms.

## Our key supply categories include:

- Materials and equipment: transformers, switchgear, cables, steel, concrete and construction plant.
- Manufactured components and technology: substation equipment, control systems, SCADA and instrumentation, sourced locally and internationally.
- Subcontracted services: civil and electrical contractors, HV testing providers, logistics, transport and crange.
- Professional and corporate services: engineering design, consulting, legal, ICT, recruitment and training.

## Geographic profile:

- Approximately 83% of suppliers operate solely in Australia (low-risk jurisdiction).
- Around 12% source from moderate-risk regions (e.g. Southeast Asia).
- Approximately 5% supply goods from higher-risk regions such as China.

## Supply chain layers:

- EPEC has strong oversight of Tier 1 suppliers through prequalification, questionnaires and contractual processes. Some residual risk remains in Tier 2 and Tier 3 suppliers, particularly where Australian suppliers import manufactured goods, components or raw materials from international facilities.

# Modern Slavery Risks

EPEC Group considers the risk of modern slavery within its direct operations to be low due to our Australian-based workforce, direct employment practices, and compliance with workplace legislation. However, like all organisations operating within construction and infrastructure sectors, there are areas of potential risk within our supply chain and subcontracted services.



## Direct Operations

- All employees are directly employed under Australian workplace laws.
- Right-to-work checks, employment contracts, award compliance and fair work conditions are in place across all entities.
- Labour hire is used only in limited, specialist scenarios and is subject to the same governance.
- As a result, the risk of forced labour, debt bondage or human trafficking within our direct operations is assessed as **low**.

# Supply Chain Risks

Potential modern slavery risks may arise in the supply chain due to:

01.	Risk Area	Description of Potential Exposure
02.	Geographic risk	Some electrical components manufactured parts and equipment originate from regions with weaker labour protections (e.g. China, Southeast Asia).
03.	Manufacturing and raw materials	Tier 2 and Tier 3 suppliers may source metals, electronics or factory-produced goods from high-risk supply chains.
04.	Subcontracted labour	Use of subcontractors in civil, electrical or logistics services increases risk if their labour practices are not adequately monitored.
	Supplier governance gaps	Some suppliers, particularly smaller subcontractors, may not have formal policies relating to modern slavery, human rights or ethical sourcing.



## Risk Assessment Approach

During this reporting period, EPEC Group undertook a structured risk assessment across its operations and supply chain. This included:

- ✓ Supplier modern slavery questionnaires and prequalification assessments;
- ✓ Categorisation of suppliers by geography, industry type and governance maturity;
- ✓ Identification of suppliers requiring further engagement or review;
- ✓ Consultation across all business units and entities through the ELT.

### Current assessment results indicate that:

- The majority of suppliers operate in low-risk jurisdictions (Australia).
- No modern slavery incidents or reports have been identified in our operations or supply chain to date.
- Some medium-risk exposure remains in offshore manufacturing and subcontracted labour.

# Actions Taken to Assess and Address Modern Slavery Risks

EPEC Group has implemented practical actions across governance, procurement, supplier engagement and reporting to manage modern slavery risks. These actions apply across all entities through one Integrated Management System (IMS).



## Action Area      What We Do

### Governance & Systems

- All entities operate under one Integrated Management System (IMS).
- Centralised procurement, HR, legal and HSEQ processes.
- Employment contracts, right-to-work checks and Fair Work compliance in place.

### Supplier Prequalification

- All new suppliers/subcontractors complete a prequalification process that includes modern slavery questions.
- High-risk suppliers (industry or geography) require additional review before approval.

### Modern Slavery Questionnaire

- Distributed to existing suppliers to assess governance, labour practices and supply chain transparency.
- Responses reviewed and suppliers categorised as low, medium or high risk.

### Contracts & Commercial Controls

- Supplier contracts include clauses requiring compliance with modern slavery laws and ethical conduct.
- Breaches allow for corrective action or termination.

### Training & Awareness

- Modern slavery awareness embedded into the IMS training program for staff involved in procurement, projects and site management.
- Training covers identifying risks and escalation pathways.

### Confidential Reporting & Remediation

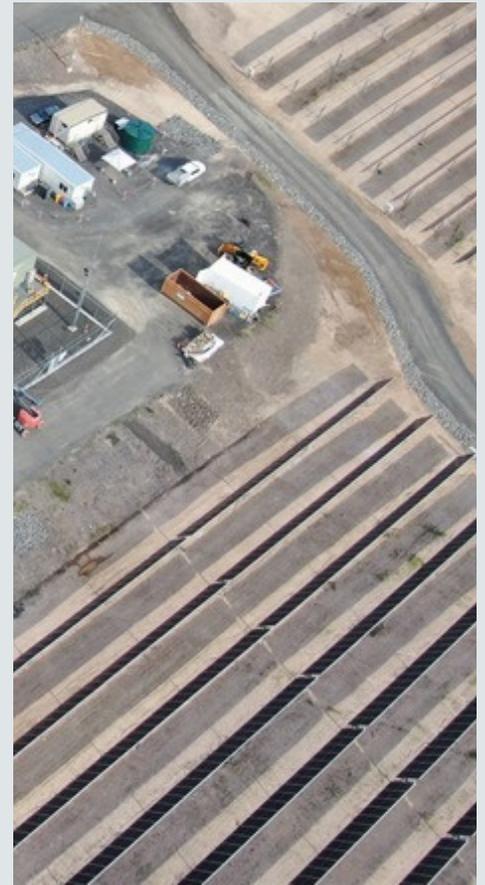
- A confidential reporting channel is available via [communications@epecgroup.com.au](mailto:communications@epecgroup.com.au).
- Managed by authorised internal stakeholders.
- Any future incident would trigger investigation, engagement with supplier and corrective action processes.

# Consultation with Controlled Entities

EPEC Group ensures that all entities it owns or controls are consulted and aligned in the development, implementation and review of modern slavery controls.

Consultation occurred through the Group’s Executive Leadership Team (ELT), which includes senior representatives from each entity:

Entity	Consulted Through	How Consultation Occurred
EPEC Group Pty Ltd (Parent)	Executive Leadership Team (ELT)	Oversight of governance, procurement, risk and policy decisions.
EPEC Projects Pty Ltd (ACN 640 363 686)	ELT representative	Participation in group-wide discussions on supplier management, risk assessment and modern slavery controls.
EPEC Engineering Pty Ltd (ACN 640 363 739)	ELT representative	Aligned engineering procurement and subcontractor engagement to group systems.
EPEC Operations Pty Ltd (ACN 688 638 664)	ELT representative	Confirmed operational, field and maintenance procurement processes follow the same group-wide IMS and supplier framework.
EPEC Operations Pty Ltd (ACN 688 638 664)	ELT representative	Confirmed operational, field and maintenance procurement processes follow the same group-wide IMS and supplier framework.



## Group-Wide Alignment

All subsidiaries operate under a single Integrated Management System (IMS), which governs procurement, supplier onboarding, contracts, human resources, governance and reporting. None of the entities use separate or stand-alone processes for supplier engagement or modern slavery risk management. The ELT confirmed that this Modern Slavery Statement accurately reflects the approach used across all entities, and that modern slavery risks are managed centrally through shared systems, frameworks and internal controls.

## Consultation Activities

Consultation included ELT meetings where each entity confirmed its adherence to group policies, supplier controls and procurement frameworks. Representatives discussed the outcomes of the modern slavery risk assessment, supplier questionnaire results and ongoing training roll-out. Each entity agreed to the content of this statement and confirmed that no alternative processes, objections or separate reporting requirements were necessary.

# Assessing Effectiveness of Actions

EPEC Group measures the effectiveness of its actions to address modern slavery through governance oversight, supplier responses, training participation and the operation of reporting mechanisms. While no modern slavery incidents have been identified within our operations or supply chain to date, we recognise the importance of monitoring and continuous improvement.



## Effectiveness is currently assessed through:

- Supplier risk assessment and review – supplier questionnaires and prequalification responses are evaluated and recorded, with suppliers categorised by risk level (low/medium/high).
- Contract compliance – modern slavery and ethical conduct clauses are incorporated into supplier agreements and purchase order terms across all entities.
- Training completion – modern slavery awareness is integrated into the Integrated Management System (IMS) training program, and completion rates are monitored for relevant personnel.
- Reporting and escalation – a confidential reporting mechanism remains available via [communications@epecgroup.com.au](mailto:communications@epecgroup.com.au), and no concerns or allegations relating to forced labour, human trafficking or exploitation have been reported.
- Executive oversight – outcomes and supplier risk matters are discussed at Executive Leadership Team (ELT) level to ensure accountability across all entities.

Based on the current assessment, overall exposure to modern slavery within EPEC's own operations remains low. Some residual risk exists in lower-tier international supply chains, which continues to be monitored.

# Future Commitments

EPEC Group is committed to further strengthening its approach to managing modern slavery risks. Over the next reporting period, we will focus on improving visibility, engagement and assurance across our supply chain and internal processes.



## Future priorities include:

- **Supplier Code of Conduct** – formalise and implement a Supplier Code of Conduct that includes clear expectations on labour standards, modern slavery compliance and ethical sourcing.
- **Strengthened contractual obligations** – continue incorporating modern slavery clauses in new supplier agreements and update legacy contracts where appropriate.
- **Ongoing training and awareness** – maintain and expand the delivery of modern slavery content through the IMS training program to employees involved in procurement, contracts, site management and finance.
- **Increased awareness of reporting channels** – continue promoting the confidential reporting email ([communications@epecgroup.com.au](mailto:communications@epecgroup.com.au)) to employees, subcontractors and suppliers.
- **Supplier engagement and monitoring** – further develop risk-based supplier follow-up, including conversations with medium or high-risk suppliers to understand their controls and, where needed, request improvements.
- **Annual review and improvement** – review this statement, risk assessment outcomes and supplier responses annually to ensure it remains accurate, relevant and effective.



# A Approval

This Modern Slavery Statement has been prepared by EPEC Group Pty Ltd on behalf of the following entities:

- EPEC Group Pty Ltd (ACN 634 234 129)
- EPEC Projects Pty Ltd (ACN 640 363 686)
- EPEC Engineering Pty Ltd (ACN 640 363 739)
- EPEC Operations Pty Ltd (ACN 688 638 664)
- EPEC Technologies Pty Ltd (ACN 652 654 692)

It has been reviewed by the Executive Leadership Team and submitted to the Board of Directors of EPEC Group for approval.

This statement was approved by the Board of Directors on behalf of all reporting entities in **December 2025**.

**Signed,**



**Name:** Jamie Alonso  
**Position:** Chief Operating Officer  
**Date:** 17 December 2025