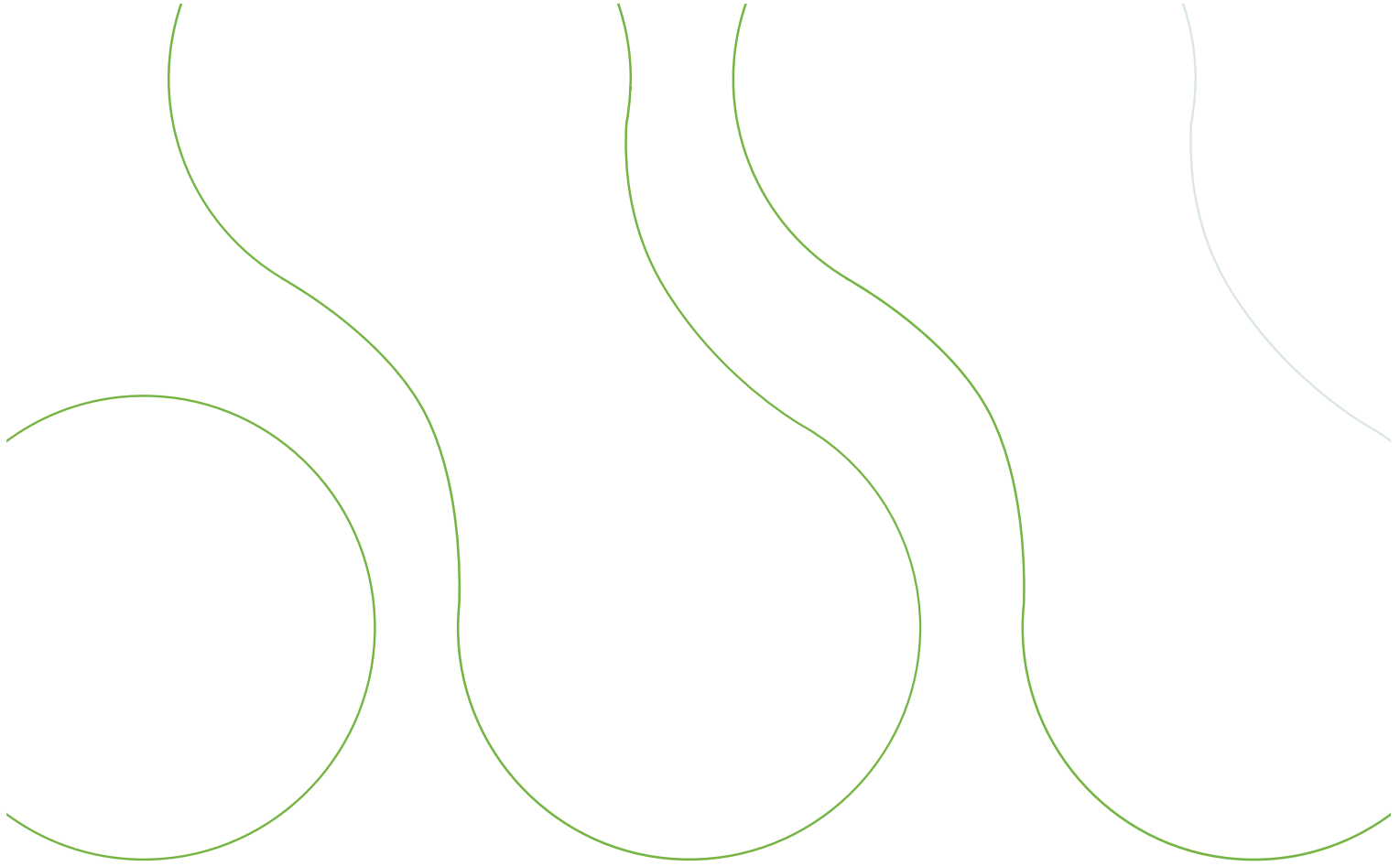




MAYFIELD
GROUP
HOLDINGS



MODERN SLAVERY STATEMENT 2025

Mayfield Group Holdings Ltd ACN 010 597 672





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1. INTRODUCTION

Mayfield Group Holdings Ltd (“MGH”) (ABN 57 010 597 672) is an Australian company, publicly listed on the Australian Securities Exchange (ASX: MYG), registered at 3 Gidgie Court, Edinburgh, SA, 5111.

MGH is an Australian leader in electrical and telecommunications infrastructure solutions. We design, manufacture, install, and maintain critical infrastructure that supports Australia's energy transition and digital transformation. With almost 90 years of experience, and a team of 215 professionals across our businesses we are at a pivotal stage of growth, focused on integrating recent acquisitions, uplifting performance frameworks across divisions, maturing our operating model, and building a robust pipeline for future expansion.

This statement, pursuant to the Modern Slavery Act 2018 (Cth) (the “Act”) and sets out the actions taken by MGH and its subsidiaries to assess and address modern slavery and human trafficking risks within our businesses and our supply chain.

This statement covers the period for the financial year ended 30 June 2025.

2. MODERN SLAVERY DEFINED

Modern Slavery refers to the grave abuse of human rights and serious crimes. It includes human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.

Modern Slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom.

3. PURPOSE

This statement is submitted on behalf of the Mayfield Group Holdings Ltd and all businesses controlled by it as listed below. This statement outlines the steps taken to identify, monitor, review and mitigate the risk of modern slavery.

| Name of Business Entity | Country of Incorporation | Equity Holding 2025 % | Principal Activities |
|-----------------------------|--------------------------|-----------------------|--|
| Mayfield Industries Pty Ltd | Australia | 100 | Manufacturing - customised control and protection systems, switchboards, kiosks and transportable switchrooms for critical electrical infrastructure. |
| Mayfield Services Pty Ltd | Australia | 100 | Delivers high, medium, and low voltage infrastructure services for a diverse range of clients across Australia including switching, testing, maintenance and asset replacement services. |
| ATI Australia Pty Ltd | Australia | 100 | Specialist provider of telecommunications and critical power products and services. |
| B.E. Switchcraft Pty Ltd | Australia | 100 | Manufacturer of low voltage switchboards and control panels, lighting control and room |



| Name of Business Entity | Country of Incorporation | Equity Holding 2025 % | Principal Activities |
|------------------------------------|--------------------------|-----------------------|--|
| | | | automation systems, Energy Management Systems, profile cutting services, and general engineering services. |
| Mayfield Group Investments Pty Ltd | Australia | 100 | Business administration and property. |

To ensure consistent and compliant policies, processes, and procedures, including in relation to Modern Slavery and other matters of governance and business ethics, all operating companies within the group are supported by the group’s shared services functions headed by the Chief Financial Officer, the General Manager People and Culture, the Chief Technology and Innovation Officer, and the General Manager Commercial Services respectively. As a holding company, MGH is the commercial, financial and shared service strength behind each of our businesses.

4. OVERVIEW

MGH recognises that Modern Slavery remains a global issue affecting millions of people around the world each year and are committed to ensuring that through our operations and supply chains we remain vigilant to ensure that we do not cause or contribute to modern slavery in any form. MGH respects the human rights of every person involved in our operations and do not accept any form of modern slavery in our business dealings.

MGH maintains policies, processes and tools to prevent, detect and respond to incidents of modern slavery and human rights abuses within its operations and supply chain. During the year we undertook a range of actions to strengthen our modern slavery policies and processes.

MGH became a Reporting Entity during the reporting period. However, prior to this the company adopted a strong position against modern slavery in all its forms. This included making diligent enquiry of suppliers and others in our supply chain to ensure that the supply chain for products and services provided by the Group is also free of modern slavery practices. We use a third-party tool, the iPRO Modern Slavery Assessment Tool, to assess modern slavery risks in our operations and supply chain. MGH engaged iPRO during the reporting period to conduct the assessments on our operations, and a bulk assessment of 301 of our suppliers. MGH intend to continue with this process as an annual assessment of our operations and supply chain.

5. MAYFIELD GROUP HOLDINGS STRUCTURE, OPERATIONS, AND SUPPLY CHAIN

5.1. Structure and Operations

MGH participates in the electrical and telecommunications infrastructure industries, providing products and services for every stage of the lifecycle. Headquartered in Adelaide and with facilities in Brisbane, Sydney, Melbourne and Perth we provide infrastructure solutions in every corner of Australia. We are a company that is:

- Solutions driven
- Focused on electrical infrastructure and telecommunications
- Inspired by a renewables future
- Manufacturing in Australia
- Striving to lead with care and good governance
- Targeting growth; organically and through acquisition.



Our operations businesses, described below, are all wholly owned subsidiaries Mayfield Group Holdings Ltd and all are based in Australia. Accordingly, our inherent risk from our business operations is low.

Mayfield Industries Pty Ltd is one of Australia's foremost producers of customised control and protection systems, switchboards, kiosks and transportable switchrooms for critical electrical infrastructure where safety and performance are key requirements. **Mayfield Services** operates from within MI delivering high, medium and low voltage infrastructure services for a diverse range of clients across Australia including switching, testing, maintenance and asset replacement services.

ATI Australia Pty Ltd (including the Power Parameters business brand) is a specialist provider of telecommunications and critical power products and services. The business engineering team possesses in-depth expertise in designing, deploying and maintaining telecommunications networks and power quality solutions for clients. Telecommunications capabilities include system design, supply, installation, network commissioning and maintenance support. Power quality capabilities include critical power systems supply & service, power quality test instrumentation supply & service, and power quality audits.

B.E. Switchcraft Pty Ltd has, for nearly 60 years, been powering Australian industries with innovative electrical solutions. Their team of passionate professionals combines deep technical expertise with a relentless drive for excellence—delivering reliable systems across commercial, industrial, and infrastructure sectors. Services include manufacture of LV switchboards and control panels, lighting control and room automation systems, Energy Management Systems, profile cutting services, and general engineering services.

MGH including all subsidiary companies do not, under any circumstances, engage in any practices that are considered modern slavery. Our recruiting and human resources practices ensure that each employee is engaged in accordance with Australian law and is paid and treated in accordance with the relevant contract, business enterprise agreement or award.

5.1.1. Identifying the Risk of Modern Slavery in Mayfield Operations

MGH's direct workforce is entirely made up of professional qualified, trade qualified, and other skilled employees with legal rights to work in Australia. Our current workforce is approximately 236 workers of which about 80% are permanent full-time or part-time employees.

Where specialist professional services are procured from countries outside of Australia, MGH policies and procedures, are designed to ensure that such contract workers are engaged in accordance with Australian law.

The risk of modern slavery in our business operations across all businesses is assessed as low due to the highly technical and specialised industries in which we operate, and the location of MGH operations; all being in Australia. Any inherent risk is managed through comprehensive and rigorous governance and compliance requirements.

5.2. Supply Chain

Each of the businesses listed above are Australian based, and most goods and services supplied, are procured locally within Australia, to support our design, engineering, manufacturing and services activities.

Most MGH suppliers operate, produce, and source across several/different sectors, but mostly based in Australia or other low risk countries. However, some of these sectors and countries are described as high-risk. High-risk sectors are those in which human trafficking activities are known to occur and were identified in the Global Estimates of Modern Slavery and child labour exploitation that were separately identified in Child Labour: Global Estimates 2020 Trends and the Road Forward (ILO and UNICEF, 2021).



5.2.1. Identifying the Risk of Modern Slavery in the Supply Chain

MGH uses a third-party tool, the iPRO Modern Slavery Assessment Tool, to assess modern slavery risks in our operations and supply chain. MGH engaged iPRO during the reporting period to conduct the assessments on our operations, and a bulk assessment of 301 of our suppliers. MGH intend to continue with this process as an annual assessment of our operations and supply chain.

Participating suppliers were asked to complete a self-assessment questionnaire online. After each supplier completed and submitted the questionnaire, their responses were assessed to determine their modern slavery risk scores and associated risk category. On completion each supplier is assigned one of the following risk categories:

- High-risk (high levels of inherent risk)
- High-risk (inadequate risk control)
- Medium-risk (partial risk control)
- Low-risk (adequate risk control)
- Low-risk (low levels of inherent risk)

To determine the appropriate risk category, responses were first evaluated for risks inherent to a supplier's operations, production, and sourcing. This is referred to as the Inherent Risk Score. The Inherent Risk Score was calculated based on the geographical, type of goods, industry sector, and workforce parameters that the supplier indicated in the Modern Slavery Assessment Tool. The Unmitigated Risk Score was evaluated on the policy and procedure responses on the questionnaire. A supplier's Unmitigated Risk Score determined whether they were categorised as having inadequate, partial, or adequate risk control. Risk scores for each assessed supplier are aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the MGH overall supply chain¹.

The supply chain assessments did not include suppliers to B.E. Switchcraft ("BES") this year as the business was not acquired by Mayfield Group Holdings Ltd during the reporting period. However, they will be included in the future and the business operations indicate that BES would demonstrate a low Inherent Risk Score.

The Aggregated Supply Chain Inherent Risk Score of 39.75% and an Unmitigated Risk Score of 34.5% with a Supplier Assessment Completion rate of 63.5%.

MGH conducts separate due diligence for new suppliers or those perceived to carry a potential medium-high risk, assessments are conducted outside of this assessment cycle with specific due diligence directed at specific industry or in country risks and this includes, where appropriate, visiting the offices *and* manufacturing plants of those suppliers or potential suppliers particularly where an on-going supply relationship is contemplated.

6. MEASUREMENT AND EFFECTIVENESS OF RISK MITIGATION ACTION

The assessment results indicate that, while there is always a need for vigilance and continuous improvement, MGH's modern slavery risk mitigation processes are effective. In the 2025/2026 financial year, MGH has committed to improve the rate of return of assessments from suppliers to achieve a response rate of 65% or greater and include suppliers to BES. We aim to improve the supply chain Unmitigated Risk Score with a target of 30%.

¹ Inherent Risk Score = The level of risk inherent to our supply chain, including countries or regions of operation, sectors of operation and how employees are recruited. Inherent risk can be difficult to change. However, it is possible to mitigate the inherent risk by implementing policies, processes, and procedures (control mechanisms). Unmitigated Risk Score = The level of risk still present after accounting for modern slavery risk controls that have been implemented in the supply chain



7. CONSULTATION PROCESS

While MGH undertook significant consultation within Mayfield Industries and their supply chain management, the company will increase the level of consultation more widely within the group during the current financial year.

8. CONTINUOUS IMPROVEMENT

MGH is committed to continuous improvement to effectively manage, with a view to elimination, the risks of modern slavery in our business operations and supply chains. We will continue to enhance our supplier engagement practices, improve our supply chain and procurement practices, and extend the regular assessments of our suppliers, and take steps to avoid the risk of complacency in the process.

9. APPROVAL

This Statement was approved by the Board of Directors of Mayfield Group Holdings Ltd as the relevant principal governing body in accordance with section 14 of the Act.

Andrew Rowe

Managing Director and CEO

December 2025



Appendix – Mandatory Reporting Criteria

This statement was prepared to meet the mandatory reporting criteria set out in the Modern Slavery Act 2018 (Cth). The following table shows where each of the mandatory criteria have been addressed within this statement.

| Modern Slavery Act 2018 (Cth) Criteria | | Mayfield Group Holdings Ltd Modern Slavery Statement 2025 |
|--|--|---|
| 1 | Identify the reporting entity | 1. Introduction (page 2) |
| 2 | Describe the reporting entity's structure, operations and supply chain | 5. Mayfield Group Holdings Structure, Operations, and Supply Chain (page 3 -5) |
| 3 | Describe the risks of modern slavery practices in operations and supply chains of the reporting entity and any entity it owns or control | 5.1 Structure and Operations (page 3-4) 5.2 Supply Chain (page 4) |
| 4 | Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes | 5.1.1 Identifying the Risk of Modern Slavery in Mayfield Operations (page 4) 5.2.1 Identifying the Risk of Modern Slavery in the Supply Chain (page 5) |
| 5 | Describe how the reporting entity assesses the effectiveness of these actions | 6. Measurement and Effectiveness of Risk Mitigation Action (page 5) |
| 6 | Describe the process of consultation with an entity that the reporting entities owns or controls | 7. Consultation Process (page 6) |
| 7 | Provide any other relevant information | 8. Continuous Improvement (page 6) |