



Construction 2 Operation Group Pty Ltd
Modern Slavery Statement 2024-2025

— We Protect Our People —

— We Act with Integrity —

— We Follow Through —



We Protect Our People
We Act with Integrity
We Follow Through



Introduction

This Modern Slavery Statement has been prepared and revised in accordance with the Australian Modern Slavery Act 2018 (Cth). This statement examines the potential risks of modern slavery within our operations and supply chains during the period 1 July 2024 to 30 June 2025. It also outlines the measures we have implemented to reduce those risks and evaluates how effective those measures have been.

This Statement has been jointly prepared by Construction 2 Operation Group Pty Ltd (ABN: 66 651 250 592) and its related entities (collectively referred to as the C2O Group) in accordance with the requirements of the Modern Slavery Act 2018 (Cth). It applies to the parent company and all associated entities, being:

- Construction 2 Operation Group Australia Pty Ltd. (ABN: 73 651 251 428)
- Construction 2 Operation Group North America Pty Ltd. (ABN: 75 651 251 437)
- Renewables Technical Services Pty Ltd. (ABN: 93 660 401 203)
- C2O Group WA Pty Ltd. (ABN: 43 661 454 011)
- Schematic Electrical Pty Ltd. (ABN: 30 139 629 342)
- Thyristors Pty Ltd. (ABN: 15 139 626 029)



We Protect Our People
We Act with Integrity
We Follow Through

Our Values

At C2O Group, our mission is to be a reliable and forward-thinking partner in delivering integrated energy, construction, and infrastructure solutions. We are committed to achieving safe, timely, and efficient project outcomes that create lasting value for our clients, empower our workforce, and contribute positively to the communities we serve, reinforced by our company values:

We act with **INTEGRITY**

C2O Group is committed to ethical conduct across all aspects of its operations. This includes maintaining transparency in our supply chains, conducting due diligence on suppliers, and ensuring that our business relationships uphold human rights and reject any form of exploitation.

We protect our **PEOPLE**

We prioritise the safety, wellbeing, and dignity of everyone working within or connected to our operations. Our modern slavery risk assessments and policies are designed to safeguard workers from coercion, forced labour, and other exploitative practices, both directly and through our supply chain partners.

We are the ones who **FOLLOW THROUGH**

C2O Group takes proactive steps to identify, address, and monitor modern slavery risks. We implement practical measures, track their effectiveness, and continuously improve our approach, ensuring that our commitments are not just stated, but actively upheld.



We Protect Our **People**
We Act with **Integrity**
We **Follow Through**

Structure, Operations & Supply Chains

Corporate Structure

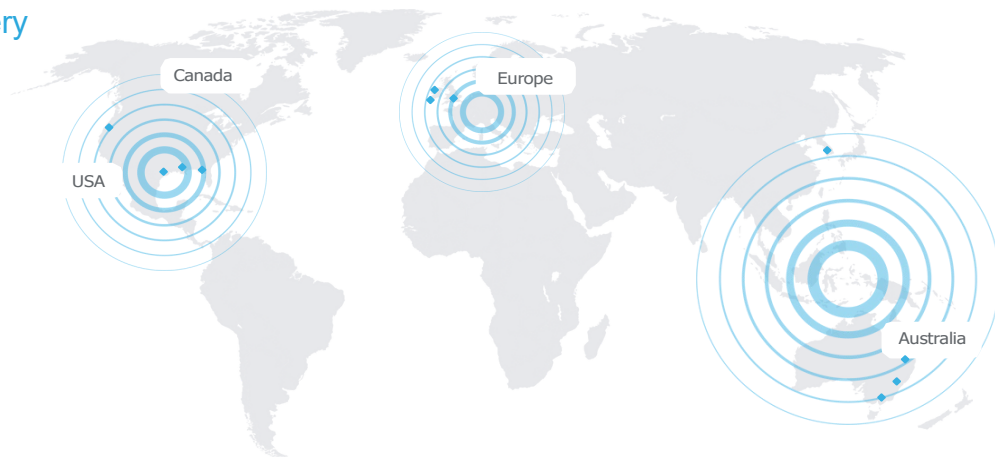
Construction 2 Operation Group Pty Ltd is the parent company of a group of entities operating across Australia and North America. All entities operate under a centralised governance framework, with shared policies, systems, and procedures.

Operations

C2O Group delivers integrated construction and engineering services across infrastructure, energy, utilities, and industrial sectors. Our capabilities span the full project lifecycle, from design and construction to commissioning, maintenance, and shutdowns.

We operate nationally, with offices in New South Wales, Victoria and Western Australia and project sites across multiple states. We are also located in Houston, USA, operating on projects in Texas, Louisiana, Maine, California and Ohio. As of 31 December 2024, C2O Group employed staff under permanent, fixed-term, and casual arrangements in Australia, and both at-will and contractual arrangements in the United States. All employment agreements comply with applicable local legislation, including the Fair Work Act 2009 and National Employment Standards in Australia, and relevant U.S. employment laws.

C2O Global Delivery



Supply Chains

C2O Group's supply chain includes:

- Subcontractors and labour hire providers;
- Suppliers of construction materials, electrical components, tools, and equipment;
- Professional services such as legal, finance, and IT.

For our Australian based entities, while most suppliers are Australian based, some goods originate from overseas, usually, via an Australian based third party entity, including jurisdictions with elevated modern slavery risks. We source components such as switchboards, cabling and specialist equipment (as necessary) through reputable Australian distributors, who in turn procure from global manufacturers. We recognise that complexity and limited visibility in extended supply chains can increase exposure to modern slavery risks.



We Protect Our People
We Act with Integrity
We Follow Through

Risks of Modern Slavery Practices

C2O Group has assessed the risk of modern slavery across its operations and supply chains.

Key risk areas include:

Direct Operations

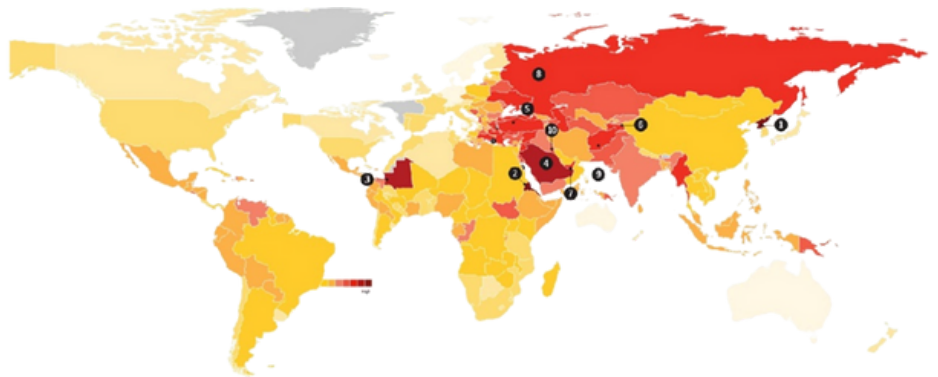
Our operations are based in Australia, a jurisdiction with strong labour protections. We consider the risk of modern slavery in our direct workforce to be low. However, we remain vigilant, particularly in relation to labour hire arrangements and subcontracted services.

Supply Chain Risks

Modern slavery risks are more pronounced in our supply chain, particularly in:

- Goods sourced from high-risk countries (e.g., electronics, textiles, steel).
- Subcontracting arrangements with limited visibility into downstream suppliers.

We use tools such as the Global Slavery Index to assess country-level risks and apply a tiered risk model to evaluate suppliers based on industry, geography, and spend volume



Indirect Risks

We acknowledge the potential for indirect exposure through suppliers' own subcontractors and third-party vendors. We manage this through contractual controls and supplier engagement.

During the reporting period, no incidents of modern slavery were identified in our operations or supply chain.

International Hiring Practices

C2O Group recognises that the engagement of international hires may present elevated risks of modern slavery, including vulnerabilities related to visa status, recruitment practices, and employment conditions, which we actively manage through rigorous compliance and oversight mechanisms.



Actions Taken to Assess and Address Risks

C2O Group has implemented a comprehensive framework to mitigate modern slavery risks, including:

Policy Framework

We maintain a suite of policies that apply across all entities:

- Modern Slavery Policy
- Code of Conduct and Ethics
- Diversity and Equal Opportunity Policy
- Whistleblower Policy

These policies set clear expectations for ethical conduct and compliance with modern slavery laws.

Contractual Controls

We work to standard contracts which include clauses requiring compliance with modern slavery laws and ethical sourcing practices. When engaging suppliers we ensure that such suppliers modern slavery polices are aligned generally consistent with our approach.

Training & Awareness

We are looking to deliver targeted training to procurement staff and project teams to improve awareness and understanding of modern slavery risks. Training covers policy requirements, supplier engagement, and grievance reporting mechanisms.

International Resourcing

C2O Group recognises that a portion of its workforce is comprised of international hires. We are committed to ensuring that all international workers are engaged under fair, lawful, and transparent employment arrangements. All employment contracts comply with Australian (and relevant US) labour laws, including visa and work rights verification, adherence to National Employment Standards, and appropriate remuneration and entitlements. C2O Group conducts thorough due diligence on labour hire providers and recruitment agencies to ensure they operate ethically and in compliance with all relevant legislation. These measures are designed to prevent exploitation, coercion, or any form of modern slavery in our workforce, and to uphold the dignity and rights of all employees, regardless of origin.



We Protect Our People
We Act with Integrity
We Follow Through

Assessing Effectiveness of Actions

We intend to evaluate the effectiveness of modern slavery controls through:

- Monitoring supplier compliance;
- Reviewing whistleblower reports and grievance procedures;
- Tracking training completion rates and staff engagement in such training;
- Consulting with procurement teams on supplier performance.



During the Reporting Period:

- No modern slavery concerns were raised through our whistleblower channels.
- No suppliers failed to meet pre-qualification standards.
- No adverse findings were identified in supplier audits.

We consider these outcomes indicative of the effectiveness of our current framework. However, we recognise the need for continuous improvement and are committed to refining our processes.



Planned Improvements for 2025 - 2026 Include:

- Enhancing supplier due diligence and risk mapping;
- Consider audit frequency for high-risk suppliers;
- Expanding training programs for staff and suppliers;
- Strengthening contractual provisions and enforcement mechanisms.





We Protect Our **People**
We Act with **Integrity**
We **Follow Through**

Consultation Process

This statement was developed in consultation with senior leaders across C2O Group's legal, procurement, human resources, and operational teams. Input was also sought from the leadership of our affiliate entities to ensure a consistent and group-wide approach.

Consultation included:

- Review of existing policies and procedures
- Assessment of supplier engagement practices
- Evaluation of training outcomes
- Feedback from procurement coordinators and project managers

We continue to engage with suppliers and subcontractors to raise awareness and promote compliance with modern slavery obligations. Collaboration across departments ensures alignment and accountability in our approach.





We Protect Our **People**
We Act with **Integrity**
We **Follow Through**

Approval

This Modern Slavery Statement was approved by the Board of Construction 2 Operation Group Pty Ltd on 18th December 2025.

Paul Buckley

A handwritten signature in black ink, appearing to read 'Paul Buckley', positioned above a horizontal line.

CEO Construction 2 Operation Group Pty Ltd