



Modern Slavery Statement

Mitchell Water Australia

31 December 2025

ENGINEER | BUILD | SUPPORT

Mitchell Water Australia Pty Ltd
(ABN 16 097 612 149) and operating
companies within the Mitchell

INTRODUCTION

This Modern Slavery Statement is for Mitchell Water Australia Pty Ltd (ABN 16 097 612 149) and its controlled entities which together form the Mitchell Group.

Mitchell Water Australia Pty Ltd (Mitchell) has a corporate responsibility to identify and address the risks of modern slavery within its supply chain. This Statement outlines these risks identified, the policies implemented to address them and their effectiveness.

Under the Australian Modern Slavery Act 2018 ('the Act'), modern slavery includes eight types of serious exploitation:

- human trafficking,
- slavery, servitude,
- forced marriage,
- forced labour,
- debt bondage,
- child labour and
- deceptive recruiting for labour and services.

This statement is for the reporting year 1 January 2025 to 31 December 2025.

STRUCTURE AND OPERATIONS

THE REPORTING ENTITY:

Mitchell Water Australia Pty Ltd (Mitchell Water), an Australian Private Company, has now crossed the reporting threshold as specified by the Modern Slavery Act. This will be the Group's first annual Statement, which requires it to outline its structure, operations, supply chains and what is being done to identify, assess and address modern slavery risks.

STRUCTURE:

The Mitchell Group (Mitchell) controls the following companies:

- Mitchell Water Australia Pty Ltd
- Envirotech Water Solutions Pty Ltd
- Infield Energy Services Pty Ltd
- Sadlier Surveying Pty Ltd
- Westmain Aust. Pty Ltd

OPERATIONS:

Mitchell is a dedicated water and energy infrastructure construction company specializing in the design and construction of Water and Coal Seam Gas (CSG) pipelines and infrastructure for water authorities, municipal and resource clients.

Mitchell's operations include the construction of pumpstation, water, wastewater and irrigation infrastructure solutions. Specialized services to the CSG sector including HDPE flow stopping, live service tapping and connection, asset locating & live excavation, testing, purging and leak detection. Specialised surveying services for resource clients and metal fabrication and maintenance for resource clients.

Mitchell's head office is Melbourne Victoria, and it operates branch offices in Bacchus Marsh, Roma and Brisbane.

The Mitchell Executive Committee, reporting to the Board of Directors, meets on a quarterly basis to review and report on business performance and compliance. This includes monitoring our modern slavery procedures, their effectiveness and future plans for improvement. The Modern Slavery Sub-Committee, was formed in 2024 and is to specifically focus identifying the risks of Modern Slavery within our operations and monitoring and improving the Group response to them

SUPPLY CHAIN

The majority of Mitchell's annual procurement spend is with suppliers and subcontractors located in Australia. We, however, recognize that some of these suppliers source the products and materials overseas.

Supporting the Group's operations are the following key supply chains:

- i. Subcontracted on-site and off-site services,
- ii. Purchase of HDPE pipe extruded and machined fittings for gas and water transportation.
- iii. Purchase of major pump and process control equipment.
- iv. Plant and equipment purchase, hire and maintenance.
- v. Transport, travel, and accommodation,
- vi. Purchase and hire of vehicles, construction equipment and tools, construction materials and consumables, clothing, footwear, branded products, IT and electronic equipment, offices, and furniture.

LABOUR

Our employees are employed under Fair Work Australia-approved enterprise agreements or individual workplace agreements (permanent, fixed term, part-time or casual contracts) that meet or exceed the minimum requirements of an applicable award.

Labour is also provided for projects by subcontractors as part of the services performed. We use standard conditions of subcontract to hold subcontractors accountable for meeting legislative requirements, including the Fair Work Act 2009 (Cth). The Group does not use third party labour providers to provide temporary labour.

MATERIALS / EQUIPMENT

The type of equipment supplied in this supply chain process includes, but is not limited to HDPE and PVC pipe and fittings, mechanical pumps, control valves switch boards and SCADA control systems.

The Australian-based companies from where Mitchell purchases these items, source assembled equipment from Europe (in particular, Austria, Germany, Sweden and Italy), China, Israel and the United Arab Emirates, with complex associated supply chains for the componentry and associated raw materials.

RISKS OF MODERN SLAVERY

We recognize that due to the nature of modern slavery every entity has risks that modern slavery can exist within its operations and supply chains. These risks are greater where we do not have direct knowledge of the terms and conditions between their suppliers and their suppliers' employees and sub-suppliers, particularly in industries or countries with a higher prevalence of modern slavery.

In 2025, Mitchell identified the following areas of its business that may have modern slavery risks in their supply chains:

- i. Cleaning of its leased offices, as cleaning services have been identified as a key risk area for modern slavery in Australia
- ii. Procurement of the following products, based on the US Department of Labor's 2024 List of Goods Produced by Child Labour or Forced Labour:
 - Steel-containing product:
 - may be procured as formed product (e.g. pipe, structural steel, reinforcing steel) or be incorporated in plant, tools, and equipment; and
 - Steel could have been produced using raw materials (e.g. iron or coal) extracted or refined under modern slavery conditions.
 - IT equipment, which is procured from local wholesalers / retailers which have been assessed by the Group as having low modern slavery risk but may have been assembled overseas in conditions where modern slavery may be prevalent.
 - Clothing, footwear and branded products that may have been manufactured or may include raw materials that have been produced under modern slavery conditions (e.g. cotton, fabrics, yarn or rubber).

ACTIONS, COMMITMENTS AND EFFECTIVENESS

During 2025, Mitchell embarked on a program to review and update the Group's practices and procedures to ensure they reflect the risks posed by modern slavery within the Group's supply chains and in the construction industry more generally.

1. PROCUREMENT PROCESS

Mitchell has incorporated modern slavery provisions into standard Group procurement processes and documentation. This includes updating and standardising the Group's Request for Quotation (**RFQ**) template across all operating entities, which is used to procure subcontractors and equipment for all projects.

When responding to RFQs, prospective subcontractors and suppliers are required to answer questions regarding steps taken to prevent human rights abuses and initiatives or strategies they have adopted to identify, assess, address or remedy actual or potential modern slavery in their operations or supply chains.

We are undertaking a review of our subcontractor prequalification processes to enhance the questions about modern slavery, so that such risks may be evaluated prior to the RFQ phase of procurement, which may prompt subcontractors to be more proactive to modern slavery risks.

2. SUBCONTRACT SUITE

Mitchell has added mandatory clauses to its standard form subcontract terms and conditions to ensure subcontractors and suppliers are contractually obligated to notify any instances of modern slavery detected within their operations and supply chains and take steps to attempt to remedy them.

3. TRAINING PROGRAM

Mitchell's commercial team has an ongoing staff training program that provides a general awareness of modern slavery practices globally. This has continued during 2025 with updates focused on key employees in the procurement process.

Mitchell are made available to new employees through the induction process

4. GOVERNANCE

Mitchell's commitment to addressing modern slavery risks in its operations is aligned with its overarching risk management framework. Mitchell requires its operating entities, directors, officers and employees to maintain high standards of ethical conduct in all of their business activities. This includes a commitment to business practices being conducted in accordance with the highest possible ethical standards, which is reflected through Code of Ethics and Business Conduct contained in the Employee Handbook.

During the year Mitchell undertook

- Benchmarking the Group against industry.
- Mapping of common suppliers across the business to provide increased opportunity for more detailed risk assessments for Mitchell's operations.
- Identifying supply chains by industry or geography that require deeper risk assessment.

Mitchell is also committed to respecting and promoting human rights for all its employees, affiliates and partners, in accordance with the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and legislation relating to human rights.

Mitchell has a Whistle-blower Policy providing a reporting framework for personnel to raise any concerns that they may have in relation to misconduct or any other improper acts by Group personnel, without fear of detriment or recrimination. This includes, but is not limited to, human rights abuses.

ASSESSMENT OF THE EFFECTIVENESS OF MITCHELL'S ACTIONS

Delivering our second Modern Slavery Statement, Mitchell's identified the differences in businesses operating platforms which creates a different approach to supply chain management, resourcing and recruitment of subcontracts.

As we navigated and challenged each other throughout the year, we agreed that the treatment of Modern Slavery should be standardised across the Group. We have increased awareness of the issue and we are starting to see pro-active identification of potential risks by our employees.

We have made a conscious effort in 2025 and plan to expand the supply chain mapping further in 2026, whilst also revisiting our current suppliers as new projects commence or circumstances with global supply chains have changed throughout the year.

FUTURE COMMITMENTS

1. MODERN SLAVERY SUB COMMITTEE

The Modern Slavery Working Committee will continue to be the representing body across our business and collaborate and share inter-company information. The Committee meets quarterly and reports to the Chief Executive Officer. For YE 2026, the Committee's Charter includes:

- Identifying supply chains by industry or geography that require deeper risk assessment;
- This has been amended to subsequently include new or amended supply chains as a result of global events post February 2026
- Reviewing the effectiveness of the Group's actions; and
- Developing roadmaps for continuous improvement.

2. TRAINING

We will seek to develop training packages specific for our Procurement teams who are our front-facing groups that come into contact with Modern Slavery through suppliers, sub-contracts and recruitment processes..

CONSULTATION

This Statement has been prepared by the Executive Committee of Mitchell Water in consultation with each operating entity and has been approved by the Board of Directors of the Mitchell Water Australia Pty Ltd, the principal governing body for Mitchell.

Mitchell makes this statement in accordance with Section 14 of the Modern Slavery Act 2018 (Cth).

A handwritten signature in black ink, appearing to be 'R. Shelton', with a large loop at the top and a long horizontal stroke at the bottom.

ROB SHELTON

DIRECTOR & CEO

MITCHELL WATER AUSTRALIA

Signed on behalf of the Directors of Mitchell Water Australia

