

# ***MODERN SLAVERY STATEMENT FY 2024***

*JANUARY 2025  
VERSION 1*

# MODERN SLAVERY STATEMENT FY2024

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# MODERN SLAVERY STATEMENT FY2024

## 1. PURPOSE & SCOPE

Modern slavery is a crime and a violation of fundamental human rights. Ampcontrol Limited (ACN 000 915 542) is committed to acting ethically and with integrity in all our business dealings. We respect human rights and take a zero-tolerance approach to modern slavery in accordance with the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights (UNGPs). Ampcontrol Limited strives to implement effective systems and controls to ensure that human rights violations do not occur within our business.

Modern slavery relationships are based on exploitation and include grave abuses of human rights and serious crimes. They involve serious violations of an individual's dignity and human rights. Modern slavery includes human trafficking, slavery, servitude, forced labour, debt bondage, deceptive recruiting for labour or services, and child labour.

Ampcontrol Limited is also committed to ensuring there is transparency within the business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the *Modern Slavery Act 2018* (Cth) and *Modern Slavery Act 2018* (NSW) (collectively, "**the Legislation**"). We expect the same high standards from all our suppliers, contractors, and business partners, and we fully expect that they hold their suppliers to the same high standards.

This Statement is made in accordance with the *Modern Slavery Act 2018* (Cth) to fulfil Ampcontrol Limited's obligations (and that of its controlled entities) under the Legislation for the financial year 1 August 2023 to 31 July 2024. The Statement has been approved by the Board of Directors of Ampcontrol Limited.

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## 2. REPORTING ENTITY AND STRUCTURE

Ampcontrol Limited is a wholly owned subsidiary of Australian investment house, Washington H. Soul Pattinson and Company Limited; the second oldest publicly listed company on the Australian Securities Exchange, which is independently a reporting entity under the Legislation.

Ampcontrol Limited has a number of wholly owned and controlled subsidiaries. In accordance with the requirements under the Legislation, Ampcontrol Limited provides this statement on behalf of the following wholly owned subsidiaries:

- Ampcontrol CSM Pty Limited (ACN 000 770 141);
- Ampcontrol SWG Pty Limited (ACN 001 737 533);
- Ampcontrol Service (NSW) Pty Ltd (ACN 002 454 079);
- Ampcontrol (QLD) Pty Limited (ACN 001 335 842);
- Ampcontrol Cables NSW Pty Ltd (ACN 074 158 759);
- Ampcontrol Burn-Brite Pty Ltd (ACN 128 065 261);
- Ampcontrol International Holdings Pty Ltd (ACN 088 317 159);
- Verico Group Pty Ltd (ACN 622 224 239);
- Capacitor Technologies Pty Ltd (trading as Ampcontrol Captech) (ACN 106 461 385);
- Complete Power Solutions Pty Ltd (trading as Ampcontrol CPS) (ACN 083 371 653);
- Ampcontrol Transformers Pty Ltd (ACN 099 836 281);
- ATF Mining Electrics Pty Limited (ACN 001 175 435); and
- Androck Engineering & Mining Pty Ltd (ACN 118 588 220).

Ampcontrol Limited also includes the following related entity (for reporting purposes under the Legislation):

- Restech Pty Limited (ACN 105 592 087);

(Collectively, "**Ampcontrol**").

During the reporting period covered by this Statement, the companies within Ampcontrol were consulted in relation to the development of this Statement. With the exception of the specific instances referred to below, companies contained within Ampcontrol utilise Ampcontrol Group Procurement.

In FY 2024, Group Procurement commenced vendor onboarding for Capacitor Technologies Pty Ltd, however the overall procurement process continues to remain in-house. Assessment of Capacitor Technologies Pty Ltd supply chains is continuing by Group Procurement in line with Ampcontrol Group Procurement procedures.

Ampcontrol Limited acquired Androck Engineering & Mining Pty Limited in May 2023. During FY 2024, steps were being taken to assess the Androck Engineering & Mining Pty Limited modern slavery risk and include them under the Group Procurement process. In FY 2024, all vendors for the Androck Engineering & Mining Pty Limited operations in Queensland were onboarded through Group Procurement in line with Group Procurement procedures. Group Procurement has also commenced reviewing and onboarding the Androck Engineering & Mining Pty Limited operations in NSW and have onboarded approximately 100 vendors during this period. This process is ongoing and will be completed over FY 2025.

Steps have also been taken during FY 2024 to assess supply chains for the Ampcontrol International Holdings Pty Ltd companies (Ampcontrol Singapore Pte Ltd; Ampcontrol Mongolia LLC and Ampcontrol Hong Kong Pty Ltd) in accordance with Group Procurement procedures. This process is ongoing and will continue over FY 2025.

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Group Procurement onboarding processes have been shared, and training in those processes have been provided to Ampcontrol Singapore Pte Ltd, Ampcontrol Mongolia LLC and Ampcontrol Hong Kong Pty Ltd. The onboarding process continues to be managed locally in those regions, in accordance with Group Procurement processes, and Group Procurement provides support as required.

Ex Testing and Certification Pty Ltd is a wholly owned subsidiary of Ampcontrol Limited, which conducts business as an independent company from Ampcontrol. Given the nature of the work completed by Ex Testing and Certification Pty Ltd, it is not envisaged that there would be modern slavery risks within the limited supply chain. This was confirmed in enquiries made to the General Manager of Ex Testing and Certification Pty Ltd.

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## 3. OPERATIONS AND SUPPLY CHAINS

Ampcontrol is challenging the future by solving the most complex problems in energy. Ampcontrol creates energy solutions of scale using innovative collaborations, their smart people and advanced Australian manufacturing. Their vision is to lead the global energy revolution and help make net zero a reality.

Every day, Ampcontrol works to support customers in their journey towards decarbonisation. Building on our 55 years of experience working with industry, Ampcontrol is ready to challenge the future and help customers future-proof their business.

Ampcontrol is transforming the world through collaboration to engineer complex electrical solutions. By working alongside universities and the brightest minds in energy, Ampcontrol develops cutting-edge technology for customers. From ideation through to design, manufacturing, service and repair, Ampcontrol provides complete electrical solutions for energy, infrastructure and resources industries.

The Ampcontrol Head Office is located in Tomago NSW with the main manufacturing and service facilities located in Tomago, Cameron Park, Callaghan, Thornton, Warabrook, and Rutherford (NSW), Mackay, Moranbah, Emerald, Gladstone, and Eagle Farm (QLD), Ringwood and Ferntree Gully (VIC), and Kewdale (WA). Operations are also located in Hong Kong, Singapore, and Mongolia.

Across its Australian and international locations, Ampcontrol employs approximately 1,300 people.

The core values of Ampcontrol guide every aspect of the business and shape its culture. The values bring together all Ampcontrol employees as a team to work towards common business goals with purpose, belonging, and commitment in the workplace.

### 3.1 Our Values

				
<i>Safety</i>	<i>People</i>	<i>Innovation</i>	<i>Customer</i>	<i>Performance</i>
Our goal is to have everyone arrive home safely every day	Our people make our business better	Our innovative team spirit is what sets us apart	Our focus is all about helping our customers with their challenges	Our combined efforts see maximum results

Ampcontrol operations are broad and relevantly included for the purposes of the Legislation, the direct employment of workers, production of electrical solutions, the provision and delivery of products and services, as well as engaging in research and development.

Ampcontrol supply chains include products and services sourced from suppliers in Australia and overseas. The most significant exposure to modern slavery risks for Ampcontrol remains within its supply chains.

During the reporting period, Ampcontrol engaged 1,929 suppliers and subcontractors to procure products and services. Of these vendors, approximately 130 were offshore vendors. The majority of the annual supplier spend of Ampcontrol occurs with suppliers and subcontractors located within Australia. Other countries with significant spending include China and Vietnam.

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Ampcontrol sources a diverse range of goods and services, including cable and electrical materials and consumables, transportation and freight, equipment purchase, and workforce labour hire.

Ampcontrol takes a risk-based approach to managing its supply chain, and throughout FY 2024 continued to enhance its modern slavery processes and tools.

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### 4. RISKS OF MODERN SLAVERY PRACTICES IN OPERATIONS AND SUPPLY CHAINS

As Ampcontrol operates across many different locations and supply chains, Ampcontrol has identified that the risk of modern slavery varies across its business operations and locations. From a practical perspective, this means that within Ampcontrol, each entity faces different challenges related to modern slavery.

Ampcontrol has taken action to address modern slavery risks in its supply chains, including in relation to conflict minerals, forced labour, and identification documentation.

Ampcontrol makes enquiries with each of its suppliers regarding modern slavery risks. Information is gathered by way of a questionnaire completed by all suppliers. Desktop audits and interviews are undertaken once the questionnaire is completed, to allow Ampcontrol to identify its suppliers' management processes and controls.

During the FY 2024, all new vendors, and existing vendors subjected to audits, have been requested to complete a questionnaire and provide information to Ampcontrol regarding their positions in respect of modern slavery. The responses are assessed and evaluated with respect to likely risk. Further evaluations may include desktop audits, interviews, and onsite audits.

If no response to the questionnaire is forthcoming, Group Procurement challenges and educates those vendors on Modern Slavery risks and the Ampcontrol Supplier Code of Conduct and evaluates whether the vendor can be accepted as a supplier.

Ampcontrol continues to work with its stakeholders to develop and implement plans and procedures to reduce modern slavery risks in its operations and supply chains and ensure compliance with the Legislation.



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## 5. ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

Ampcontrol has implemented systems and controls to ensure modern slavery risk is addressed within its business and supply chains. Ampcontrol has developed a modern slavery framework outlining its commitment to respecting human rights and the process it takes to prevent, detect, and respond to the risks of modern slavery in both its operations and supply chains.

The initial assessment undertaken by Ampcontrol of modern slavery risks concentrated on its supplier audits and potential supplier evaluations through its Group Procurement function. Group Procurement has identified geographic locations at higher risk of modern slavery, and suppliers in those geographic locations are subjected to a higher level of assessment. This may include onsite audits, and a critical review of the supplier's processes and policies.

Action has also been undertaken to identify and obtain information from suppliers where there may be a greater risk of modern slavery practices by reason of the provision of "at risk" goods and services or supply chain complexity as part of Ampcontrol's due diligence procedures.

### 5.1 Employment Practices

Ampcontrol is committed to ensuring employees' human rights are respected through its internal policies and practices. This includes the Freedom from Discrimination, Harassment, and Bullying Policy and the Grievance Resolution Procedure.

The majority of the Ampcontrol workforce is employed directly, reducing the potential for direct cause modern slavery practices within Ampcontrol operations. Ampcontrol has very few contractors/labour hire employees, including those from its international divisions.

All recruitment activities and appointments in Australia and internationally are fair, equitable, respectful, transparent, consistent, and confidential. Ampcontrol employees are engaged under fair, just, and ethical employment conditions. The aim is for all employees to work in a safe and professional work environment in accordance with Ampcontrol core values.

Ampcontrol is committed to fostering an inclusive and equitable workplace that celebrates the diversity of its workforce. The Ampcontrol Equity, Diversity, and Inclusion (ED&I) Strategy details the vision of Ampcontrol to create a safe and respectful working environment that embraces equity, diversity, and inclusion and provides opportunities for First Nations people.

### 5.2 Modern Slavery Training

Ampcontrol has its own internal training platform called Bright Spark – which brings together training content and modules from a large number of training providers. It is committed to continually improving awareness of modern slavery as a crucial part of identifying and addressing business risks.

All Group Procurement department employees have completed a course in Bright Spark on Modern Slavery. The modern slavery training completed is entitled "Modern Slavery Awareness" and is provided by Savv-e Learning. Savv-e Learning is a training provider that creates online modules covering many varied business topics. The "Modern Slavery Awareness" training covers what modern slavery is, why and how modern slavery occurs in supply chains and operations, compliance with the Australian modern slavery legislation, and highlighted actions that can be taken to ensure transparency in supply chains and operations.

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Group Procurement employees have also been trained on the Ampcontrol Responsible Supply Chain Policy and accompanying supplier Code of Conduct, which has now been provided to existing and new suppliers.

All People department employees have also received training on modern slavery through Bright Spark, and are also aware of their obligations in respect of minimum employment terms and standards under both the *Fair Work Act 2009* (Cth) and industrial relations instruments with which they are also required to comply.

## 5.3 Assessing Current Suppliers

To manage modern slavery risks in its supply chain, Group Procurement utilises a number of tools including the Procurement Supplier Purchasing and Inventory Management Business Standard and Supply Risk Calculation Matrix.

The Procurement Supplier Purchasing and Inventory Management Standard outlines the principles and practice that must be followed for the procurement of goods, materials, services, and intellectual property assets. It includes details regarding governance and responsibility for the procurement of goods, materials and services, considerations of probity and conflicts of interest; health, safety, environment, and quality risk management; and requirements around ethical behaviour, sustainability, modern slavery, and social responsibility. It sets out the manner in which supplier evaluations must be performed, including the use of the Supplier and Sub-Contractor Onboarding Procedure. A risk-based approach is taken to conduct a comprehensive appraisal, including considerations of modern slavery and conflict minerals.

Ampcontrol requests that current suppliers complete a Supplier Assessment Questionnaire. Ampcontrol acknowledges that risk profiles and circumstances may change over time, and accordingly, Ampcontrol requires that assessed high-risk suppliers complete such a questionnaire on an annual basis and other suppliers when requested. The questionnaire requires that suppliers advise whether they have assessed modern slavery risks within their businesses. When a supplier confirms they have done so, copies of their modern slavery statements and/or policies are requested and evaluated.

In circumstances where no such assessment has been undertaken, suppliers who satisfy the requirements of a reporting entity under the Legislation are reminded of their obligations under the Legislation and given a timeframe in which to provide a modern slavery statement. For suppliers who are not reporting entities, Ampcontrol encourages the provision of a voluntary modern slavery statement within a given timeframe. In both circumstances, the expectations of Ampcontrol are clearly communicated and expressed. Modern slavery risks are explained and identified. If suppliers fail to comply with those requirements, an assessment is undertaken as to whether Ampcontrol is able to purchase, or continue to purchase goods and/or services from that supplier.

Assessment of modern slavery risk forms part of the Ampcontrol supplier audit process. To facilitate this, the Supplier Quality Risk Matrix includes a requirement to calculate Modern Slavery risks as part of the Supply Risk Calculation Matrix.

In FY 2024, Ampcontrol implemented more rigid requirements and required all onboarded international vendors to undergo a desktop audit at the time of onboarding. Depending upon the results of the desktop audit, Ampcontrol has the discretion to also require an onsite audit to be undertaken.

In relation to audits undertaken during onboarding, Ampcontrol has undertaken approximately 50 vendor onsite audits of existing suppliers. Audits may be conducted by internal employees or external contractors, depending upon the risks identified and required experience. Multiple site audits may be conducted for existing vendors where a quality concern or risk has been identified.

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Ampcontrol uses the Supplier Quality Risk Matrix to make a determination of the supplier's risk profile, to determine how critical this supplier is to the Ampcontrol supply chain, and whether goods and services can or should continue to be obtained from that supplier.

### 5.4 Assessing New Suppliers

In its assessment of potential new suppliers, Ampcontrol also utilises the Procurement Supplier Purchasing and Inventory Management Business Standard and Supply Risk Calculation Matrix and requests that potential new suppliers complete a Supplier Assessment Questionnaire.

As outlined above, enquiries are made regarding potential new suppliers' modern slavery risks and their own assessments of such risks. Concerns raised during this process and an evaluation of the overall business risk rating in accordance with the Supply Risk Calculation Matrix result in further engagement with the proposed supplier, including seeking clarification of the risks, educating the supplier as to the requirements and/or further detailed analysis of risks involved, and potential onsite audits.

If concerns that do not align with Ampcontrol and cannot be worked through with the supplier are identified, the relationship will be terminated.

### 5.5 Terms of Trade and Conditions of Purchase

Modern Slavery provisions are included in the Ampcontrol Terms of Trade, the Conditions of Purchase, and the Ampcontrol Supplier Code of Conduct.

Ampcontrol requires suppliers and customers to warrant that they are compliant with the legislation, have no outstanding investigations, and have not been convicted of an offence under applicable Modern Slavery legislation.

In addition, where Tin, Tungsten, Tantalum, or Gold (3T&G) are used, suppliers are required to maintain a source of origin or smelter records, which are to be provided to Ampcontrol upon request.

Ampcontrol has deployed its Supplier Code of Conduct to new and existing suppliers. Ampcontrol requires that its suppliers comply with its Supplier Code of Conduct, which includes specific conditions in relation to respect in the workplace and employee human rights. The Supplier Code of Conduct sets out Ampcontrol expectations including the requirement that suppliers proactively identify and address risks of modern slavery practices in its business operations and supply chains.

### 5.6 Sustainable Procurement

As part of its commitment to sustainability, Ampcontrol engaged an external consultancy firm to conduct a review and produce a report on supply chain sustainability risk and opportunity, based on ISO 20400 responsible procurement standard.

A Gap Analysis and Recommendation Report was produced, which assessed the current Ampcontrol policies, processes, and planned activities against the appropriate standards and guidance. Ampcontrol has updated its policies, processes, and documents to reflect the recommendations contained in that Report. Ampcontrol has also developed a Responsible Supply Chain Policy and Supplier Code of Conduct as a result of this review.

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## 5.7 Modern Slavery Policy

The Ampcontrol Modern Slavery Policy is used for tenders, customer enquiries and to educate its employees.

The Ampcontrol Modern Slavery Policy sets out its commitment to acting ethically and with integrity in all of its business dealings, as well as implementing effective systems and controls to identify and eradicate modern slavery risks both operationally and in its supply chains.

## 5.8 Grievance Mechanism for Employees, Contractors and Suppliers

Under the Ampcontrol Whistleblower Policy, a discloser may report to an external independent whistleblowing service any instances of modern slavery in their supply chain. A report using this service can be made anonymously and will be handled in accordance with the Ampcontrol Whistleblower Policy.

## 6. MEASURES TO ASSESS THE EFFECTIVENESS OF THE ACTIONS TAKEN

Ampcontrol remains committed to applying and refining its modern slavery policies and procedures. It continues to consult with its stakeholders to evaluate and improve the effectiveness of such procedures.

The effectiveness of the actions of Ampcontrol in addressing its modern slavery risks is assessed in several ways, including but not limited to:

- Reviews of both its modern slavery framework and procedures to evaluate their effectiveness in both identifying and mitigating risks;
- Ongoing assessment of the changing risk profiles of operations and its supply chain;
- External audits of its policies and procedures;
- Achievement of its objectives; and
- Increasing employee awareness and appreciation of such risks.

## 7. CONSULTATION PROCESS

Ampcontrol recognises the importance of internal and external communication to minimise the risk of Modern Slavery within its operations. Key internal stakeholders include the Board; Senior Leadership Team; Health, Safety, Environment and Quality (HSEQ) Steering Group; and the Commercial; Procurement and People departments.

Such communication ensures stakeholders (internal and external) are provided with timely, accurate and thorough information concerning Modern Slavery risks and concerns to ensure that Ampcontrol operations and supply chains can be managed effectively and minimise the risk of exposure to Modern Slavery.

The Group Procurement department, Ampcontrol Audit & Risk Committee, and Ampcontrol Senior Leadership Team were provided with the Modern Slavery Policy for comment before it was finalised and approved by the Board of Directors of Ampcontrol Limited.

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## 8. ANNEXURE

### RESPONSIBILITIES

#### **Compliance, Monitoring, and Review**

This Statement will be updated on an annual basis in accordance with the requirements under Legislation.

#### **Reporting & Records Management**

The Commercial Services department will record any incidents of modern slavery identified and the actions taken. Where appropriate, the Commercial Services department will refer to the Chief Financial Officer for any incidents that require further investigation or management.

### TERMS AND DEFINITIONS

"**Ampcontrol**" means all references contained in this document to Ampcontrol Limited, including any related body corporate.

"**Modern Slavery**" is as defined in the *Modern Slavery Act 2018* (Cth) as including any conduct constituting a modern slavery offence (as defined within the Act), and/or any conduct involving the use of any form of slavery, servitude, or forced labour to exploit children or other persons taking place in the supply chains of government agencies or non-government agencies.

### RELATED LEGISLATION AND DOCUMENTS

#### **Legislation**

*Modern Slavery Act 2018* (Cth)  
*Modern Slavery Act 2018* (NSW)

#### **Internal Policies and Procedures**

BS-05 Procurement Supplier Purchasing and Inventory Management Business Standard  
FRM-058 Ampcontrol Terms of Trade  
FRM-492 Ex Supplier Quality Risk Matrix  
FRM-147 Ampcontrol Conditions of Purchase  
FRM-1629 Supplier Assessment Questionnaire  
HSEQ-33 Supplier Code of Conduct  
POL-007 Ampcontrol Modern Slavery Policy  
POL-009 Responsible Supply Chain Policy  
WI-668 Supplier Evaluation or Review Work Instruction

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## 9. FEEDBACK

Users and managers may provide feedback about this document by emailing: [Commercial.Services@ampcontrolgroup.com](mailto:Commercial.Services@ampcontrolgroup.com)

## 10. APPROVAL AND REVIEW DETAILS

This Statement has been approved by the Board of Directors of Ampcontrol Limited.



Rod Henderson  
 Managing Director & CEO  
 29 January 2025

Approval and Review	Details
Approval Authority	Approved by the Board of Directors of Ampcontrol Limited
Administrator	Commercial Services
Next Review Date	FY 2025 Statement

Approval and Amendment History	Details
Original Approval Authority and Date	Created by Commercial Services and approved by Group Manager – Legal & Commercial
Amendment Authority and Date	Approved and adopted by the Board of Directors of Ampcontrol Limited