




HRS-POL-0030

# Modern Slavery Statement

Rev 1

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## CONTENTS

Who is Australian Portable Camps.....	4
What is Modern Slavery .....	4
Our Commitment .....	4
Risk Assessment .....	4
Recruitment Practices .....	5
Subcontracting Chains.....	5
Remote Location Working Conditions .....	5
Responsibilities.....	5
Management .....	5
Procurement and Supply Chain.....	5
Employees .....	5
International Workers and/or Student Visas .....	6
Training and Awareness .....	6
Employee Training.....	6
Supplier Training .....	6
Measuring Effectiveness .....	7
Next Steps .....	7
Expand Risk Assessment and Due Diligence .....	7
Strengthen Supplier Engagement .....	7
Enhance Training Programs.....	7
Ongoing Monitoring and Reporting .....	7
Increase Stakeholder Collaboration .....	8
Continuous Policy Improvement.....	8
Strengthen International Worker Safeguards.....	8
Approval and Review.....	8
Reporting Entities covered by Statement .....	8

## WHO IS AUSTRALIAN PORTABLE CAMPS

Australian Portable Camps (APC) is a leading Australian provider of modular construction and complete camp solutions, specializing in serving remote sites across various industries, including mining, construction, and emergency services. Established in 2001 by Frank Martino, APC operates from a purpose-built manufacturing facility in Monarto, South Australia, covering 160 acres with 72,000 m<sup>2</sup> of undercover production lines.

## WHAT IS MODERN SLAVERY

Modern slavery refers to the exploitation of individuals through force, coercion, or deception for purposes such as labour, sex, or servitude. Unlike historical slavery, it often involves people being trapped in situations where they have little to no freedom to escape due to threats, abuse, or manipulation. It affects millions worldwide, crossing borders and industries, including agriculture, construction, domestic work, and sex trafficking. Modern slavery is a hidden crime, making it challenging to detect, but its existence underscores the urgent need for global action, awareness, and stronger legal frameworks to protect vulnerable individuals.

## OUR COMMITMENT

We are committed to taking a strong stand against modern slavery in all its forms. We will not tolerate any form of forced labour, human trafficking, or exploitation within our operations or supply chains. We are dedicated to upholding human rights, ensuring fair and ethical treatment for all individuals involved with our business. Through rigorous due diligence, transparency, and continuous monitoring, we strive to create an environment where workers are treated with dignity and respect. We will collaborate with stakeholders, raise awareness, and take proactive steps to eliminate modern slavery, ensuring that every action we take reflects our dedication to protecting the rights and freedoms of all people.

At Australian Portable Camps, we are committed to:

- Upholding the highest ethical standards, including the elimination of forced labour, human trafficking, child labour, and any form of modern slavery from our operations and supply chains.
- Ensuring our employees, contractors, and suppliers understand their responsibility to comply with our policies and legal obligations concerning human rights.
- Promoting the rights and dignity of all individuals who work with us, directly or indirectly, by offering fair and safe working conditions.

## RISK ASSESSMENT

Through our ongoing risk assessments, we have identified several areas where modern slavery risks may arise:

**RECRUITMENT PRACTICES** We recognize that workers hired through third-party recruitment agencies or labour hire companies may face exploitation or unfair treatment, especially migrant workers with limited knowledge of their rights.

**SUBCONTRACTING CHAINS** The use of subcontractors for services such as catering, cleaning, and maintenance may create opportunities for exploitation if adequate oversight is not maintained.

**REMOTE LOCATION WORKING CONDITIONS** The remote nature of some of our work sites can make workers vulnerable to abuse due to isolation, long hours, and limited access to external support.

We are committed to addressing these risks through rigorous checks, supplier engagement, and the implementation of our code of conduct.

Australian Portable Camps have a strong process in place to ensure that employees are paid above the legal minimum wage rates set by the Fair Work Commission each year. Additionally, we have an internal working group where remuneration and industrial relations specialists collaborate to regularly review employee pay rates and conditions, ensuring they meet or exceed the legal minimum wage requirements.

## RESPONSIBILITIES

### MANAGEMENT

- Management is responsible for fostering a culture of zero tolerance towards modern slavery and human trafficking within the organization.
- They must ensure that appropriate procedures and training programs are in place to identify, prevent, and address instances of modern slavery.
- Management should provide leadership and resources to support the efforts to ensure transparency and accountability throughout the organization.

### PROCUREMENT AND SUPPLY CHAIN

- The procurement and supply chain teams are responsible for conducting due diligence on suppliers and business partners to assess their compliance with anti-slavery and human trafficking laws and standards.
- They must include provisions and supplier codes of conduct that prohibit modern slavery and require suppliers to maintain ethical labour practices.
- The procurement and supply chain teams should collaborate with suppliers to address any identified instances of modern slavery and support efforts to remedy the situation.

### EMPLOYEES

- All employees are responsible for familiarizing themselves with their role in preventing modern slavery within the organization and its supply chains.
- Employees must report any concerns or suspicions of modern slavery to management or the designated compliance officer without delay.

- Employees should actively engage in training and awareness programs to recognize the signs of modern slavery and understand their responsibilities in upholding ethical labour practices.

## INTERNATIONAL WORKERS AND/OR STUDENT VISAS

In response to the shortage of qualified workers in the regions where Australian Portable Camps operates, we may sponsor new workers to come to Australia to meet this demand. In alignment with the Modern Slavery Act, Australian Portable Camps is committed to preventing modern slavery, human trafficking, and any form of exploitation within our workforce.

To ensure compliance with visa conditions and relevant legal requirements, we conduct thorough right-to-work checks throughout the employment lifecycle.

These include:

- Comprehensive background checks during recruitment for all new employees through our external provider, which includes identity verification, right-to-work validation, and criminal record checks.
- Ongoing right-to-work and eligibility checks to ensure that employees maintain valid visas throughout their employment, including monitoring changes to job roles or hours to ensure they comply with visa conditions.
- Regular monitoring and auditing of visa compliance to identify and mitigate any risks of non-compliance or exploitation.

These guidelines are designed to prevent exploitation and human trafficking and provide assurance that any potential risks related to our migrant workforce are detected and addressed. Furthermore, any international recruitment agencies engaged by Australian Portable Camps are required to adhere to our Supplier Code of Conduct, which includes strict anti-slavery and anti-trafficking obligations.

## TRAINING AND AWARENESS

We believe that educating our workforce and business partners is essential to preventing modern slavery. As part of our ongoing commitment:

### EMPLOYEE TRAINING

All employees are offered free training on modern slavery and human trafficking through organisations such as Anti-Slavery Australia. This training ensures that employees are aware of the signs of modern slavery and how to report concerns. Toolbox and Pre-Start meetings are also regularly held where Modern Slavery can be discussed.

### SUPPLIER TRAINING

We work with our suppliers to provide training on ethical labour practices and to raise awareness about the importance of preventing modern slavery in their operations. This training is part of our supplier onboarding process and is reinforced through regular communications.



## MEASURING EFFECTIVENESS

We understand that progress in eradicating modern slavery requires continual effort and evaluation. As such, we have implemented mechanisms to measure the effectiveness of our anti-slavery practices, including:

- Regular reviews and updates to our policies and procedures to ensure their ongoing relevance and effectiveness.
- Annual assessments of our suppliers' compliance with our anti-slavery policies, including performance metrics on worker conditions and labour standards.
- Monitoring complaints and concerns raised through our whistleblowing system to identify trends or recurring issues.

## NEXT STEPS

In line with our ongoing commitment to combat modern slavery, Australian Portable Camps (APC) will take the following steps to enhance and strengthen our efforts:

### EXPAND RISK ASSESSMENT AND DUE DILIGENCE

We will expand our risk assessment processes to cover a broader range of suppliers and subcontractors across all operations and reevaluating current suppliers both here and internationally. This will include more rigorous checks and evaluations of potential risks within our supply chain, with particular attention given to remote locations, recruitment practices, and subcontracting chains.

### STRENGTHEN SUPPLIER ENGAGEMENT

We will continue to engage with our suppliers and subcontractors, ensuring they understand and uphold our anti-slavery policies. We will work closely with them to address any issues identified, offer support in improving practices, and ensure that all business partners comply with our Supplier Code of Conduct.

### ENHANCE TRAINING PROGRAMS

Our training programs for employees, suppliers, and contractors will be further developed to ensure comprehensive understanding of modern slavery risks, ethical labour practices, and the processes for reporting concerns. This includes expanding access to anti-slavery workshops and incorporating relevant topics into routine workplace discussions.

### ONGOING MONITORING AND REPORTING

We will continue monitoring and auditing our supply chains, with particular focus on high-risk areas. This includes the regular review of supplier compliance and labour conditions, as well as establishing clear channels for employees to report any suspicions of exploitation without fear of retaliation.

### INCREASE STAKEHOLDER COLLABORATION

We will seek further collaboration with industry leaders, human rights organizations, and regulatory bodies to share knowledge, improve best practices, and enhance the effectiveness of our anti-slavery efforts. Our goal is to actively contribute to broader initiatives aimed at eradicating modern slavery.

### CONTINUOUS POLICY IMPROVEMENT

We will regularly review and update our anti-slavery policies and procedures to ensure they are in line with best practices and evolving legal requirements. These reviews will ensure that our operations are continuously improving in line with the most effective strategies for tackling modern slavery.

### STRENGTHEN INTERNATIONAL WORKER SAFEGUARDS

For international workers on visas, we will further strengthen our safeguards, ensuring ongoing compliance with visa conditions and preventing exploitation. This will involve additional checks and continuous monitoring to ensure workers' rights are protected throughout their employment lifecycle.

Through these steps, APC reaffirms our unwavering commitment to a future free of modern slavery, where every individual in our workforce is treated with the respect and dignity they deserve.

### APPROVAL AND REVIEW

This statement is approved by the board of directors of Australian Portable Camps and will be reviewed and updated annually to reflect the ongoing work we are doing to address modern slavery risks. Our commitment to continuous improvement ensures that we remain proactive in our efforts to eliminate modern slavery from our business operations and supply chain.

### REPORTING ENTITIES COVERED BY STATEMENT

Australian Portable Camps runs a group of Australian-affiliated businesses, all led by our Board of Directors. The Board works to ensure we provide great service and maintain strong governance throughout everything we do.

We worked closely with all the companies we own or control (listed below) to help prepare this statement. We explained the reporting requirements under the *Modern Slavery Act 2018*, shared our planned actions to meet these requirements, and provided them with useful information and updates.

**Australian Portable Camps Pty Ltd**, A.B.N 45 340 478 370, ACN 653 243 666

**APC Equipment Hire Pty Ltd**, A.B.N 18 759 249 658

**APC Manufacturing and Logistics Pty Ltd**, A.B.N 43 119 762 962, ACN 119 762 962

**Australian Portable Camps Services Pty Ltd**, A.B.N 28 114 381 163, ACN 114 381 163

**Australian Portable Construction Pty Ltd**, ACN 131 342 400



**APC Pt Hedland Trust, A.B.N 87 715 571 091**  
**APC BOO1 Trust, A.B.N 57 794 210 930**  
**APC Pt Hedland Pty Ltd trustee, ACN 166 123 986**  
**Australian Portable Camps Holding Trust, A.B.N 55 489 332 088**  
**Blackrock Diner Pty Ltd, A.B.N 27 161 512 698, ACN 112 089 880**  
**APC Operations Trust, A.B.N 42 366 118 232**  
**Frank Martino Pty Ltd Trustee, ACN 166 036 362**  
**FAM Trust, A.B.N 00 123 456 789**  
**APC Shareholdings Trust, A.B.N 26 695 260 802**  
**APC Investments 1 Pty Ltd, ACN 114 381 136**  
**APC Investments 2 Pty Ltd, ACN 119 763 110**  
**APC Investments 3 Pty Ltd, ACN 123 359 615**  
**APC Investments 4 Pty Ltd, ACN 149 081 523**  
**APC Investments 5 Pty Ltd, ACN 149 081 532**  
**260 Franklin Street Pty Ltd, ACN 168 396 067**  
**APC 098514955 Pty Ltd, ACN 098 514 955**  
**Giachett Pty Ltd Trustee, ACN 659 671 217**  
**Corso Umberto Family Trust, A.B.N 38 405 062 425**  
**Edmund Avenue Trust, A.B.N 83 561 164 196**  
**Edmund Avenue Pty Ltd trustee, ACN 117 916 695**  
**Knarfy Pty Ltd trustee, ACN 663 366 943**  
**Piccolo Family Trust, A.B.N 73 914 891 314**  
**Ossecnarf Pty Ltd Trustee, ACN 663 737 808**  
**Rosa Air Family Trust, A.B.N 63 827 260 404**  
**Remote Camps Transport Pty Ltd, ACN 161 512 698**  
**Powerwall Pty Ltd, ACN 156 568 099**  
**Volumetric Pty Ltd, ACN 156 568 106**  
**Framar Holdings Pty Ltd, ACN 050 119 803**  
**APC Parks Pty Ltd, ACN 130 629 971**  
**Nu-Tek Panel Pty Ltd, ACN 157 794 208**  
**Nu-Tek Housing Pty Ltd, ACN 147 647 416**  
**Nu Tek Multi Story Pty Ltd, ACN 157 794 217**  
**Nu Tek Building Systems Pty Ltd, ACN 165 914 581**  
**WWTP Investments Pty Ltd, ACN 606 001 898**  
**Eco-Tek Water Systems Pty Ltd, ACN 606 003 089**  
**JV Maintenance Global Pty Ltd, ACN 606 007 649**  
**APC Patents Pty Ltd, ACN 112 089 880**  
**Sanniti Family Trust, ABN 68 404 167 510**  
**Framar Nominee Pty Ltd Trustee, ACN 062 399 357**  
**Frank Martino Family Trust, A.B.N 69 398 011 077**  
**APC (Qld) Pty Ltd, ACN 135 716 139**  
**APC Maintenance Pty Ltd, ACN 131 342 366**  
**APC Group (Australasia) Pty Ltd, ACN 163 701 004**  
**IBD Construction Pty Ltd, ACN 161 998 045**  
**MB Industrial Precinct Pty Ltd, ACN 162 822 371**