



**QUANTA SERVICES  
AUSTRALIA**



**MODERN SLAVERY STATEMENT 2024**

# **QUANTA SERVICES AUSTRALIA**

**MEARS GROUP PTY LTD (ABN 92 149 486 500)  
AND OPERATING COMPANIES WITHIN THE  
QUANTA SERVICES AUSTRALIA GROUP**





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# 1. INTRODUCTION

This Modern Slavery Statement ('Statement') is a joint statement submitted by Mears Group Pty Ltd (ACN 149 486 500) ("Mears") on behalf of itself and all other subsidiaries and controlled entities of Mears\* (each a "Reporting Entity" and collectively "Reporting Entities").

There is an organisation structure on [page 6](#) of this Statement for the benefit of readers.

\*Mears is the most senior Australian entity and has management and control of all Reporting Entities. This Statement focuses on the policies and processes of the entities that are in active operations including Consolidated Power Projects referred to as CPP, Nacap, Ensco and Axcentium. The Quanta Services Australia Group will be referred to as the 'Group' or 'QSA.'

Under the Australian Modern Slavery Act 2018 (Cth) ('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. Modern slavery is only used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. However, these practices may also be illegal and harmful and may be present in some situations of modern slavery. These practices may also escalate into modern slavery if not addressed.

The 2023 Global Modern Slavery Index ("GS Index 2023") prepared by the Walk Free Foundation estimates that approximately 50 million people across the globe are in living in modern slavery today, with Asia Pacific region accounting for largest number in modern slavery (approx. 29.3m people) and approximately 28 million people in forced labour.

As a business with a large global supply chain and operations across Australia and overseas, we recognise that modern slavery may occur in every country we operate in and in our supply chain. As a global business, we recognise that we can make a positive social impact in the communities in which we operate by applying sound ethical business and good governance practices.

The Group is subject to the Act and this will be the Group's fifth 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. In this Statement, the active operating entities in the Group offer their individual improvements and progression in tackling modern slavery.

This Statement covers the reporting year 1 January 2024 to 31 December 2024.

*"QSA is committed to managing all aspects of its operations and supply chains where we have an ability to assess and address risks of modern slavery."*

—Rick Boreham, QSA President

# 2. STRUCTURE AND OPERATIONS

The active operational companies in the Group deliver consulting, engineering, design, construction, commissioning and/or maintenance in the mining, gas, energy, and water infrastructure sectors.

QSA provides governance over these operational companies as part of a larger global family of entities which are ultimately owned by Quanta Services Inc. ('Quanta Services'), a publicly listed company (NYSE: PWR) incorporated in Delaware, United States of America. Quanta Services employs over 60,000 employees globally and has the largest skilled labour workforce in North America. Quanta Services provides fully integrated infrastructure solutions in the utility, energy, and communications industries. In YE 2024, the Quanta Services Group's revenue was \$US23.67B.

QSA also has an associate company, Mitchell Water, and participates as a minority shareholder. Mitchell Water's operations are not reviewed as part of this Statement.

In YE 2024, the Group employed over 600 people across Australia and had a small workforce in Papua New Guinea ('PNG') via its operations with Nacap. The acquisition of Axcentium Pty Ltd, a specialist consultancy in the electricity generation, transmission and distribution sector, also occurred and is now included in this Statement.

## QSA'S OPERATING ENTITIES SERVICE THE FOLLOWING SECTORS:

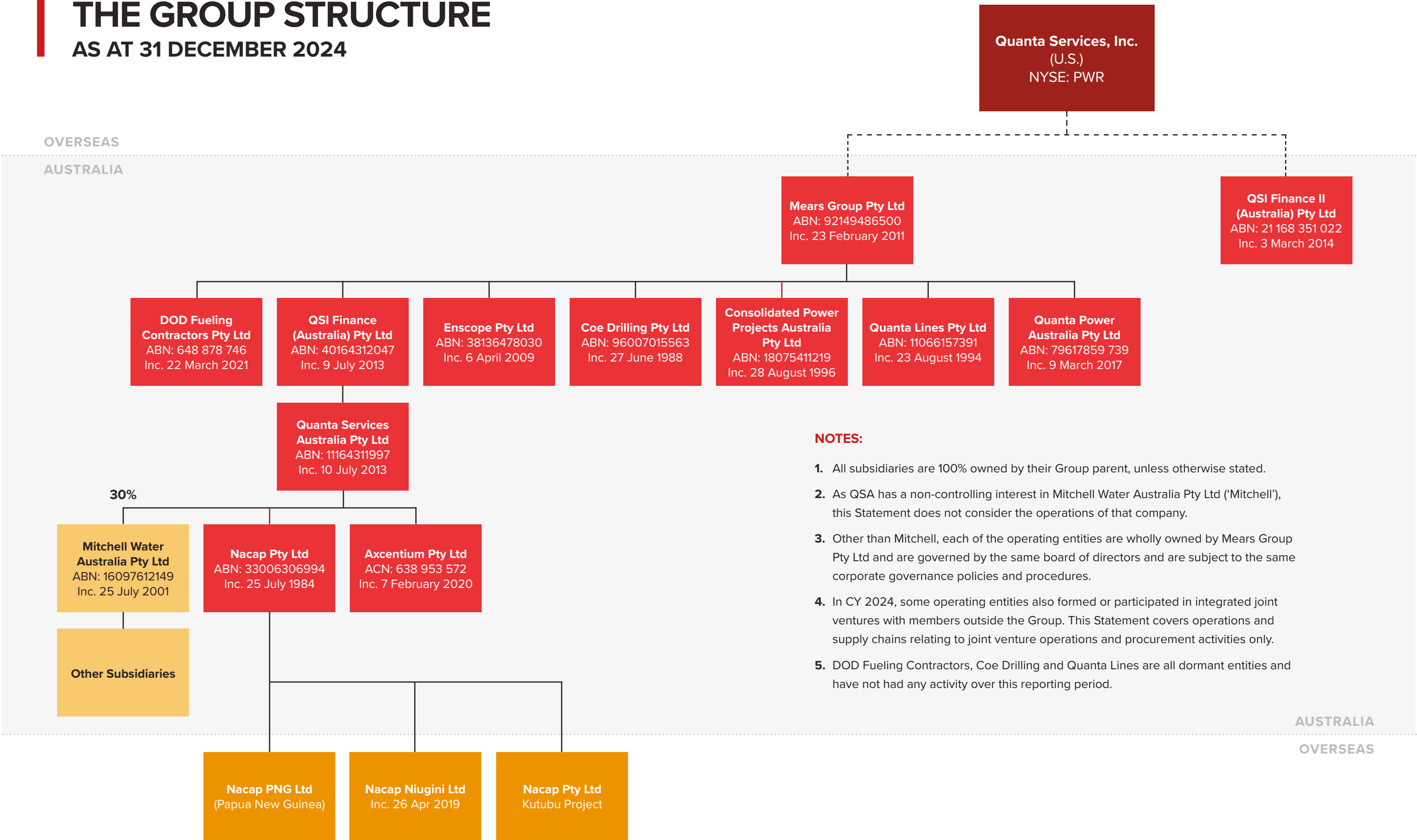
- electric power (renewable energy generation – battery energy storage systems, solar and wind, electrical transmission, substations and distribution and civil works and infrastructure);
- oil, gas and petrochemical (transmission pipelines and their related facilities such as metering stations, compressor stations, pump stations and processing facilities);
- mining (slurry and concentrate transmission pipelines and their related facilities such as metering stations, pump stations and processing facilities);
- water (supply and trunk pipelines and their related facilities such as inlet structures, pump stations, water storage, filtration, and treatment plants); and
- civil and aircraft refueling infrastructure for US defence force at military airfields in Australia.

## PROJECT SERVICES PROVIDED BY QSA'S OPERATING ENTITIES INCLUDE:

- design, engineering, project development, project management, procurement, construction, and commissioning of new infrastructure including civil, mechanical, structural, electrical and process engineering; and
- maintenance, refurbishment, asset management and asset condition assessment of existing infrastructure.

# THE GROUP STRUCTURE

AS AT 31 DECEMBER 2024





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

- a. Subcontracted on-site and off-site services, including trades, skilled, semi-skilled and unskilled labour;
- b. Purchase of major process and high voltage equipment designed and built to specified project requirements;
- c. Purchase of steel pipe, extruded and machined steel fittings and process control equipment for incorporation into gas and water extraction, transportation, and processing infrastructure;
- d. Plant and equipment hire and maintenance;
- e. Transport, travel, and accommodation, including portable camps;
- f. Export logistics to support PNG-based operations; and
- g. 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

Most of the Group's 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 to projects by subcontractors as part of the services performed. The Group uses standard conditions of subcontract to hold subcontractors accountable for meeting legislative requirements, including the Fair Work Act 2009 (Cth). The Group's operating entities also use third-party labour providers to provide temporary labour to assist with project delivery.

#### MATERIALS / EQUIPMENT

In 2024, the vast majority of QSA's annual procurement spend was with suppliers and subcontractors located in Australia. We recognise that some of these suppliers source the products and materials overseas.

The type of equipment supplied in this supply chain process includes, but is not limited to, high voltage equipment such as synchronous condensers, voltage, current, power and step-up transformers, capacitors, reactors, circuit-breakers, disconnectors, cabling, conductor and other high voltage materials.

The Australian-based companies from where QSA Group purchases these items source assembled equipment from Europe (in particular, Austria, Germany, Sweden, France and Italy), China, India, Canada, USA and South Korea, with complex associated supply chains for the componentry and associated raw materials.







## 4.

# RISKS OF MODERN SLAVERY IN OPERATIONS AND SUPPLY CHAINS

The Group recognise that risks of modern slavery are greater where QSA's operating entities do not have direct knowledge of the terms and conditions between their suppliers and their suppliers' employees and sub-suppliers, particularly in geographies and industries with a higher prevalence of modern slavery.

**In the 2024 reporting year, the Group identified the following areas of its business that may have modern slavery risks in their supply chains:**

- a. Engagement of local labour for PNG operations, given PNG has a higher modern slavery risk than Australia;
- b. Cleaning of its leased offices and site compounds, as cleaning services have been identified as a key risk area for modern slavery in Australia<sup>1</sup>;
- c. Procurement of the following products<sup>2</sup>:
  - i. 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.
  - ii. Copper-containing product, which may be procured as cabling or wire, or incorporated into manufactured goods including electronics, IT equipment, construction equipment or tools and copper could have been extracted or refined under modern slavery conditions;
  - iii. 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;
  - iv. 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);
  - v. Structural timber, which could have originated from a country with modern slavery risk for timber production; and
  - vi. Other rare earth minerals such as gold, tin, zinc, silver, cobalt etc. that have been mined to go into manufacturing of equipment.

<sup>1</sup> Australian Human Rights Commission, 'Tackling modern slavery and labour exploitation with the Cleaning Accountability Framework', 25 March 2021 (<https://humanrights.gov.au/our-work/business-and-human-rights/projects/tackling-modern-slavery-and-labour-exploitation>).

<sup>2</sup> US Department of Labor, Bureau of International Labor Affairs (ILAB), 2022 List of Goods Produced by Child Labor or Forced Labor, September 2022 (<https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods-print>).



# ACTIONS, COMMITMENTS AND EFFECTIVENESS

In 2024, we initiated a series of actions and have been successful in delivering on the Group's modern slavery actions and commitments. Operating entities within the Group standardised modern slavery language in subcontractor pre-qualification forms, provided training for new staff and refresher courses to current staff and shared and disseminated information about our modern slavery obligations.

The Group's Modern Slavery Committee ('Committee') convened to discuss and track our modern slavery actions and commitments and will continue to do so in 2025. The Committee comprises of at least one member from each of the active operating units CPP, Nacap, Enscope and Axcentium. The Committee meets quarterly and encompasses a member from either or both of the procurement and legal disciplines. As part of this Group-wide Committee, the active operating units share their ongoing commitments. These include:

- ✓ **Communicating non-compliant suppliers across the Group;**
- ✓ **Sharing the learnings across the Group as each operating unit continuously reviews and re-assesses their processes for relevance and effectiveness;**
- ✓ **Discussing legislative updates; and**
- ✓ **Reviewing Group policies for updates and current and ongoing needs.**

As part of its commitment to modern slavery compliance, QSA integrated modern slavery risk management into its ERP vendor selection process in 2024.

During this phase, QSA conducted workshops with potential ERP vendors to assess their capability to support compliance with the Act. These workshops enabled QSA to define functional requirements and select an ERP system that enhances supply chain transparency, ethical procurement, and compliance tracking.

Following evaluation, QSA has selected an ERP system based on its ability to meet these compliance needs. The system will support modern slavery risk management through:

## STRENGTHENED SUPPLIER DUE DILIGENCE

- Automating supplier pre-qualification, requiring modern slavery compliance declarations before engagement.
- Integrating risk assessment tools to flag high-risk suppliers and subcontractors and enforce additional scrutiny.

## INTEGRATED COMPLIANCE INTO PROCUREMENT & CONTRACTING

- Embedding modern slavery clauses in supplier and subcontractor contracts and enabling compliance tracking.
- Establishing approval workflows to prevent engagement with flagged suppliers and subcontractors without corrective actions.

## ENHANCED SUPPLY CHAIN VISIBILITY & REPORTING

- Providing real-time tracking of suppliers and subcontractors to improve transparency.
- Implementing automated compliance reporting and audit trails to ensure ethical sourcing.

In 2025, QSA will conduct scope discovery workshops and initial user acceptance testing with its ERP provider to further refine the system's compliance capabilities.

By embedding modern slavery risk management into ERP vendor selection, the Group will strengthen its ability to identify, assess, and mitigate risks, reinforcing its commitment to ethical business practices.

We note that each of the active operating entities face different modern slavery challenges within their businesses due to the differences in business sectors and, therefore, materials and equipment required; however have largely adopted a joint approach with regards to the evaluation, supply chain mapping and [Supplier Code of Conduct](#) compliance of supplier and subcontractors.

For example, CPP procures most of the equipment for the renewable energy sector outlined on [page 13](#), whereas Enscope ([page 14](#)) and Axcentium ([page 15](#)) as primarily consultancy businesses, has a limited requirement for substantial equipment purchases. Nacap's high risk is mainly borne out of the purchasing of steel-related products and its operations in Papua New Guinea ([page 16](#)).

The Committee provides a platform to discuss these differences and the dialogue they each have with key clients, suppliers and subcontractors. As such, and in acknowledgement of these differences, each Group operating entity presents their own 2024 achievements, commitments and effectiveness on the following pages.



## CONSOLIDATED POWER PROJECTS (CPP) MODERN SLAVERY ACTIONS AND COMMITMENTS

FY2024



### Actions Completed

- ✓ Invited and initiated the inclusion of additional CPP personnel to actively participate in Modern Slavery Committees.
- ✓ Expanded supply chain mapping to include Tier 3 suppliers and subcontractors, including the Indirects space.
- ✓ Re-evaluated mandatory modern slavery training to cover a broader reach of employees.
- ✓ Continue to re-assess the modern slavery training to ensure reflective of modern slavery legislation and reporting requirements and risks identified as specific to CPP supply chains.
- ✓ Review FY2025 forecast spend to identify new high-risk Tier 1 suppliers and subcontractors.
- ✓ Re-evaluated Supply Chain Mapping Guidelines to ensure reflection of industry best practice.

FY2025



### Commitments

- ✓ Expand Modern Slavery training to include specifics pertaining to site supplier and subcontractor inclusion, focusing on instances of identification and appropriate actions.
- ✓ Expand Supply Chain Mapping Guidelines to include additional supply and purchasing categories.

**NOTE:**

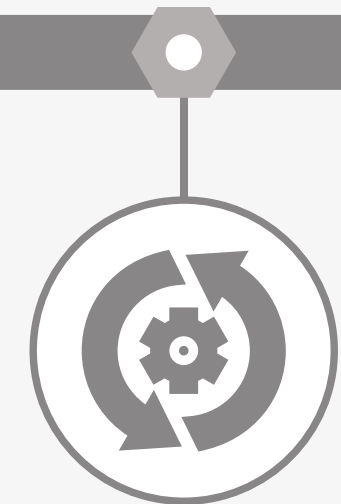
"Tier 1" refers to suppliers and subcontractors with high CPP procurement spend and modern slavery risk profiles;  
"Tier 2" refers to suppliers and subcontractors with medium CPP procurement spend and modern slavery risk profiles;  
"Tier 3" refers to suppliers and subcontractors with a low CPP Procurement spend and low modern slavery risk profiles; and  
"Indirects" references non-project bespoke purchasing.

FY2026



### Future Actions

- Benchmark modern slavery training against industry proponents.
- Benchmark modern slavery supply chain mapping against industry peer groups.



### Ongoing Commitments

- ✓ Continue to re-assess the modern slavery training to ensure reflective of modern slavery legislation and reporting requirements and risks identified as specific to CPP supply chains.
- ✓ Regularly review modern slavery training and mandatory participants for improvements.
- ✓ Communicate high-risk identified subcontractors and suppliers to CPP and QSA.
- ✓ Continuously review and re-assess all process, policies and guidelines for relevance.
- ✓ Continue to monitor modern slavery clauses in subcontracts to ensure they are reflective of customer requirements in respect of modern slavery and risks identified as specific to CPP supply chains.
- ✓ Liaise with QSA and CPP Legal Counsel for legislative updates.
- ✓ Connect with high-risk suppliers or subcontractors to support their management, mitigation and the prevention of modern slavery risks.
- ✓ Conduct supplier and subcontractor pre-qualification and re-evaluation reviews.
- ✓ Continue active participation and business use of CPP's and QSA's Modern Slavery Committees.
- ✓ Provide a supportive culture that encourages commitment to reporting modern slavery risks.



## ENSCOPE MODERN SLAVERY ACTIONS AND COMMITMENTS

FY2024



### Actions Completed

- ✓ Continued to implement processes of identifying and assessing the potential risks of modern slavery in our operations and supply chains, including development of Self-Assessment Questionnaires for our supply chain.
- ✓ Continued the process of raising awareness of modern slavery risks with our supply chain, through review and implementation of modern slavery clauses in key supply contract templates.
- ✓ Continued to provide modern slavery awareness training programs to all our employees.
- ✓ Collaborated with other QSA stakeholders to share best practices and develop collective solutions to address modern slavery.

FY2025



### Commitments

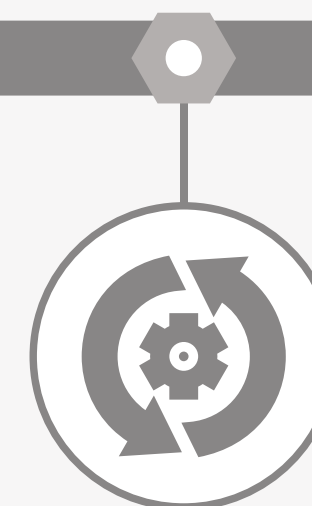
- ✓ Investigate the possibility of an appropriate supplier mapping strategy for our business, considering spend and product origin.
- ✓ Investigate and implement appropriate supplier and subcontractor prequalification processes including adherence to QSA Code of Conduct. Include as part of RFT process.
- ✓ Review and refresh targeted modern slavery training to key personnel within the business.
- ✓ Attend and actively contribute to QSA's Modern Slavery Committee and initiatives.
- ✓ Bolster internal working group to enhance modern slavery commitments and actions.

FY2026



### Future Actions

- Investigate and establish appropriate minimum standards for due diligence and risk assessment processes for monitoring suppliers and subcontractors (e.g. audits, site visits, interviews etc).
- Implement supplier register with risk rating to identify modern slavery compliance status.
- Promote reporting channels (whistle-blower line) internally and to suppliers to report any breaches or suspected breaches of modern slavery.



### Ongoing Commitments

- ✓ Communicate non-compliant suppliers to QSA.
- ✓ Collaborate with non-compliant suppliers to support their management, mitigation and resolution of potential breaches.
- ✓ Continuously review and re-assess our risk assessment and due diligence processes to ensure they remain relevant solutions to address modern slavery risks.
- ✓ Liaise with Legal Counsel for legislative updates.
- ✓ Continue to actively participate in QSA's Modern Slavery Committee.
- ✓ Continue to collaborate with industry and business peers to further develop our modern slavery actions and commitments.



## AXCENTIUM MODERN SLAVERY ACTIONS AND COMMITMENTS





**NACAP MODERN SLAVERY ACTIONS AND COMMITMENTS**

**FY2024**



**Actions Completed**

- ✓ Continued foundation for supply chain mapping of all project suppliers and subcontractors.
- ✓ Further refined the Vendor Assessment Questionnaire ("VAQ") to enable meaningful data capture for risk-based evaluation of suppliers and subcontractors.
- ✓ Implemented use of PowerBI to automate data capture and to summarise modern slavery data graphically for future evaluation
- ✓ Collaborated with QSA stakeholders to share best practices and advance coordinated responses to modern slavery through joint initiatives and knowledge exchange.
- ✓ Participated in workshops and engagement activities with QSA and other operating companies to evaluate potential Enterprise Resource Planning (ERP) vendors for their capacity to support compliance with the Australian Modern Slavery Act 2018.

**FY2025**



**Commitments**

- ✓ Restructure the procurement and logistics functions to support a unified, organisation-wide approach to supply chain management, enhancing transparency and accountability across modern slavery risk areas.
- ✓ Appoint a senior manager with responsibility for overseeing supply chain operations at a consolidated level, ensuring alignment and consistency across procurement and logistics activities in both Australian and PNG operations
- ✓ Develop and implement a comprehensive supply chain procedure encompassing procurement, logistics, and subcontractor management, and emphasise organisational awareness and compliance with modern slavery obligations.
- ✓ Finalise a new suite of subcontract templates with consistent approach to modern slavery compliance.
- ✓ Work with QSA to select an ERP vendor that can assist with improving modern slavery compliance and reporting.

**FY2026**



**Future Actions**

- Implement a structured process for evaluating and reporting on modern slavery data, subject to the availability of sufficient data input.
- Commence supply chain mapping based on data capture (spend analysis, product and manufacturing origin) with captured data to be reported in future Modern Slavery Statements.
- Prepare new training sessions on awareness of modern slavery once restructured group is complete and senior manager is appointed.
- Harness the new ERP system to reduce modern slavery risks in operations and supply chains.

**Ongoing Commitments**

- ✓ Communicate non-compliant suppliers to Nacap and QSA management.
- ✓ Continuously review and re-assess the process for relevance and effectiveness.
- ✓ Liaise with QSA's Legal Counsel for legislative updates.
- ✓ Connect with non-compliant suppliers to support their management, mitigation and resolution of breaches.
- ✓ Continue to attend and actively participate in QSA's Modern Slavery Committee.
- ✓ Conduct regular supplier reviews.
- ✓ Review forecast spend annually to identify further high risks.





## 6. SUMMARY

QSA continues to recognise the importance of human rights and will continually improve its processes both as a Group and as individual entities. The individual active operating entities within the Group have identified both their future actions and ongoing commitments on pages [13](#), [14](#), [15](#) and [16](#) of this Statement

As a Group, we will continue to share information through our Group Modern Slavery Committee and beyond as the disruption and speed of the transition from fossil fuel energy generation to clean and renewable energy generation in Australia puts more strain on already limited supply chains and workforces. We will also evolve the Group-wide Modern Slavery Policy to have a common platform of our principles. Lastly, we will ensure that our people are informed and that we create a safe workspace where workers feel empowered to speak up in accordance with the values of the Group.

In addition to the responsibilities of the Committee, these members facilitate ongoing consultation and engagement across the various operating units. This Committee also has oversight of modern slavery initiatives and actions across the Group as well as drafting and preparing this Statement.



This Statement has been prepared by the Group in consultation with each of its active operating entities and has been approved by the Board of Directors for Mears Group Pty Ltd as the principal governing body of the Quanta Services Australia group of companies.

**RICK BOREHAM**  
**DIRECTOR & PRESIDENT**  
**QUANTA SERVICES AUSTRALIA**

Signed on behalf of the Directors of  
Mears Group Pty Ltd



# **#WE ARE QUANTA**

**QUANTASERVICES.COM/AUSTRALIA**

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