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Introduction

Protech Group (Aust) Pty Ltd ABN 38 163 904 694 and its subsidiaries ("Protech") recognise the Modern Slavery Act 2018 (Cth) which came into effect on 1 January 2019 and believe that all businesses have an obligation to prevent slavery and human trafficking. Protech are committed to preventing slavery and human trafficking within our business and within the supply chains through which Protech operate.

Modern slavery may include the trafficking of people, forced labour, servitude, and slavery. As a large employer in Australia, Protech take our responsibility seriously and our processes around applicant and client engagement ensure our employees are alert to the signs of exploitation, and Protech are committed to acting promptly and effectively should it be identified.

The Act requires reporting entities subject to the Act, to produce an annual modern slavery statement. This statement highlights the steps Protech has taken to ensure there is no slavery or human trafficking occurring within Protech or within our supply chain. Protech's commitment to our purpose to be a 'Positive influence in people's lives' as well as our first corporate value of 'We put people first' are key drivers for our reputation within our market and are essential for our continued success.

ABOUT OUR BUSINESS

Protech Group Structure

Protech Group (Aust) Pty Ltd and its subsidiaries, are proudly Australian owned and operated, providing qualified, professional, and technical recruitment services across the nation, as at 30 June 2023 Protech employ over 4000 people through a network of more than 20 Branches in all states and territories.

Company Structure



Protech was established in 2006 and remains led by its founder and Managing Director. They are supported by an executive leadership team and a management team which oversees operations and the implementation of strategic plans and activities for our service provision.

Doc No. Revision:	Previous Doc. No.:	Doc Owner:	Approver & Issue Date:	Page:
POL_0045_2.0	POL_0045_1.1	EXEC	Exec 08-Dec-2023	1 of 5
			e	

Printed copies are for reference only. See Document Register for current revision.

>protech

Page: 2 of 5

Our Operations

Our business provides labour hire and recruitment services as well as delivers proactive programs for First Nation Peoples, Women in Non-Traditional Roles and Apprentice and Traineeship employees across our core market focus areas of:

Civil Infrastructure Construction Building Construction Engineering Construction Manufacturing & Services Energy & Power Defence Mining Government Services Rail and Track Safety

Our Supply Chains

Our supply chains include, but are not limited to, sourcing field employees for clients. This may involve the introduction by external agencies to Protech of applicants for onward supply to our clients such as Job Network Agencies and First Nation Community Programs. These external agencies are vetted and confirmed for compliance and all potential field employees are put through our due diligence processes.

In addition, Protech's supply chain for the delivery of recruitment services includes the provision of Personal Protective Equipment and Pre-employment medicals. All suppliers and partnerships are carefully selected and Protech expect our clients, and suppliers to aim for high ethical standards and to operate in an ethical, legally compliant, and professional manner by adhering to our Terms of Business and Codes of Conduct. Protech also expect our clients and suppliers to promote similar standards in their own supply chain.

Specific Risks Related to Our Supply Chains

Protech has identified our upstream supply chain as the Primary risk of Modern Slavery. As part of this, suppliers of goods and services to us must provide their supply chain's Modern Slavery assessment and mitigation processes for assessment and approval. Protech do not commence trad until these actions have been taken, and we are satisfied that the actual risks have been quantified and addressed suitably by our suppliers.

We pay particular attention to the international elements of our supply chains, at Protech these are provider(s) of business process outsourcing services, and the upstream risks in the materials required for Protech uniforms. Protech consult specifically with these suppliers, in particular when they are located in, or if they source materials from countries or locations that have been idenfitied as higher risk for instances of modern slavery as per Modern slavery indexes.

OUR COMPLIANCE PROGRAM

Our Policy on Slavery and Human Trafficking

Protech recognise, respect, and protect the human rights of our employees, as well as those of our clients, suppliers, business partners and the communities affected by our operations:

- Employees should be free to choose to work for their employer and to leave the company upon reasonable notice.
- All employees must be provided with a clear contract of employment, which complies with local legislation.
- All employees must be treated in a fair and equal manner and with dignity and respect.
- Any form of unlawful discrimination, victimisation or harassment on grounds including, but not limited to, marital or civil partnership status, sex (including gender reassignment), race (including colour, ethnic and national origin, nationality), disability, sexual orientation, having or not having dependents, religious belief or political opinion, age, trade union activity and irrelevant criminal record should be prohibited.

Doc No. Revision: POL_0045_2.0
 Previous Doc. No.:
 Doc Owner:
 Approver & Issue Date:

 POL_0045_1.1
 EXEC
 Exec 08-Dec-2023

 Printed copies are for reference only. See Document Register for current revision.

MODERN SLAVERY AND HUMAN

TRAFFICKING STATEMENT

>protech

- All applicable laws and industry standards on employee wages, benefits, working hours and minimum age should be adhered to in all countries of operation, without any unauthorised deductions.
- Suppliers should observe the provisions of the International Labour Organization such that any young persons under the age of 18 should not be employed to work at night or for any hazardous work and their employment should not harm the young person's education, health or physical, mental, moral, or social development. Similarly, young persons below the age of 16 may be employed provided their parent/guardian signs a consent form and provides this to the Employer.
- All slavery and human trafficking laws must be complied with including, but not limited to, the Modern Slavery Act 2018 (Cth). Suppliers must ensure their business operations are free from slavery and human trafficking practices whether in Australia or elsewhere, both internally and within their supply chains and other external business relationships.
- Protech will never take possession of, retain, or withhold employee passports or other travel documents of its employees.
- Protech are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Our Risk of Modern Slavery Practices

To identify and manage risk Protech have a robust risk management program which includes regular review of risks and drives actions to assist Protech to identify, assess, monitor, and manage our business risk.

Protech recognise that as an employer of on-hired employees who are engaged in work on sites where Protech do not have operational control presents a risk for modern slavery. As a result, our systems and processes have been established to ensure that the selection of our clients, field employees, and supply chain partners are closely managed and that this risk is mitigated. In addition, our programs of regular communication and site visits validate our ongoing partnerships. This forms part of our ongoing commitment to operating a lawfully compliant and ethically sustainable business.

Our Due Diligence Process for Slavery and Human Trafficking

Field Employee Selection

Protech undertake our 'Protech Certified Process' for the onboarding of all our field employees which outlines a series of 10 strict compliance checks to be carried out for all field employees engaged including but not limited to verifying the identity of each worker and their right to work before supply commences. Protech systems provide a full letter of engagement for each field employee outlining the terms and conditions of employment including the pay rate and entitlements as well as providing the relevant Fair Work information statements.

Client Assessment and Approval

Each client Protech supplies is subject to a rigorous assessment process prior to supply including terms of business and/or contract terms review to ensure compliance, as well as a physical site check to verify the conditions within which our field employees will be deployed.

Labour Hire Licensing

Protech is a licensed Labour Hire organisation, as required under the various state licensing schemes. With regards to the high-risk sectors identified by the Migrant Workers' Taskforce report delivered in 2019, Protech only supplies limited field employees in the meat processing sector and does not provide to the horticulture, cleaning, and security sectors.

MODERN SLAVERY AND HUMAN

TRAFFICKING STATEMENT

>protech

Industry Body Participation

Protech are active participants with several industry bodies including the Australian Industry Group and the Recruitment, Consulting and Staffing Association where two senior management employees hold council positions. Our partnership with these organisations includes advocating for industry best practice standards and improving education outcomes for both within our industry and the broader client and supply chain.

Supply Chain Assessment

As part of our commitment to identify and eradicate slavery and human trafficking, Protech have in place a process to undertake due diligence on our supply chain network to ensure compliance with legislative obligations; such compliance may form part of our contractual relationship with suppliers. Protech's leadership team have undertaken site visits to our key offshore partners to verify the engagement and working conditions of our supply chain partners. Where this has not been possible, Protech has, as part of default supplier on-boarding, developed a Modern Slavery Assessment questionnaire that all suppliers are required to complete at a minimum annually.

Reporting Program

All Protech employees have access to voice concerns, through local and national reporting mechanisms or through the Protech Whistleblower Standard. Protech is committed to protecting employees when disclosing malpractice and will ensure that all disclosures made in good faith will be treated confidentially and without fear of retaliation.

Training

All staff within Protech are expected to comply with all laws and act in accordance with local guidelines and regulations and act with integrity and honesty. A training module on modern slavery and human trafficking is also available via an elearning module which forms part of a training package undertaken by new employees. Protech are committed to ensuring that 100% of client/supplier facing employees have completed this training in the 2022 calendar year. Should any of our employees need any additional information or support regarding human trafficking, forced labour, servitude, and slavery this will be provided.

CONSULTATION

To prepare this statement, Protech have consulted with employees in all group entities, including safety, risk, compliance, operations, human resources, industrial relations, and our suppliers. Protech executive management were required to endorse this statement in draft form before it was presented to the Managing Director for final approval and publication as a true and accurate reflection of Protech's stance towards Modern Slavery.

All Protech stakeholders are aware that at any time there is a mechanism for raising any grievance, including any potential instance of Modern Slavery in relation to Protech operations.

OUR CONTINOUS IMPROVEMENT APPROACH

Assessing the effectiveness of the actions taken

Protech will undertake ongoing assessment of our supply chains by evaluating information received from our suppliers and to promptly act on allegations or findings of involvement in such practices to ensure continuous improvement of our outcomes. Protech commit to an annual review process whereby members of senior management will review our response to modern slavery.

Looking forward

Over the next reporting period, Protech will continue to assess ways to reduce the risks of modern slavery and some steps to be taken will include:

Refinement of supplier review process with members of senior management.

Doc No. Revision:Previous Doc. No.:Doc Owner:ApprPOL_0045_2.0POL_0045_1.1EXECExec

Approver & Issue Date: Exec 08-Dec-2023 Page: 4 of 5

MODERN SLAVERY AND HUMAN

TRAFFICKING STATEMENT



- Implement and refine regular and recurring timelines where suppliers are to re-complete Protech's Modern Slavery Assessment Questionnaire; supplemented by communication that supplier relationships may be jeopardised if this assessment is unable to be completed fully.
- Continue training on modern slavery risks and explore contextualised learning opportunities for Protech Group stakeholders around examples of modern slavery (risks and actual instances) within the Labour Hire industry, and its supply chain.
- Engage positively and collaboratively with suppliers to ensure that their modern slavery risks continue to be mapped and further understood.

This statement is made pursuant to the Act and constitutes Protech's slavery and human trafficking statement in respect of the 2022-2023 financial year. This statement for Protech Group (Aust) and its subsidiaries was approved by the board of Protech Group (Aust) Pty Ltd as the parent entity on 8th December 2023.

Marc Meili Managing Director

Doc Owner: EXEC