MODERN SLAVERY POLICY & STATEMENT

Statement Date	22/07/2026	**Financial Year**	FY 26/27
Organisation	Apollo Fabrication Group Pty Ltd	**Approved By**	Board of Directors
Document Owner	HR & Safety Manager / Procurement	**Next Review**	29/06/2027
Review Cycle	Annual		

1. Purpose

Apollo Fabrication Group Pty Ltd (Apollo) is committed to conducting its business lawfully, ethically and responsibly. Apollo does not tolerate modern slavery, including slavery, servitude, forced labour, human trafficking, debt bondage, deceptive recruiting, child labour or other unlawful exploitation.

This Policy & Statement explains Apollo's approach to identifying and responding to modern slavery risks within its operations and supply chains. It supports Apollo's governance, procurement and client prequalification requirements and reflects the principles of the Modern Slavery Act 2018 (Cth). It does not represent that Apollo is a mandatory reporting entity unless the applicable statutory reporting threshold is met.

2. Application

This Policy & Statement applies to Apollo's Australian operations, employees, contractors and the suppliers and subcontractors engaged to support those operations. It is a voluntary governance document unless Apollo becomes subject to a mandatory reporting obligation under applicable law. Nothing in this Policy & Statement creates contractual rights, guarantees or obligations beyond those imposed by applicable law or expressly agreed contractual arrangements. Apollo will apply this document having regard to the size, nature and risk profile of its operations and the information reasonably available at the relevant time.

3. Structure, Operations and Supply Chains

Apollo's core business is the fabrication and installation of structural steelwork. Work is undertaken at Apollo's manufacturing facility in Young, NSW and on construction sites managed by principal contractors and building companies where Apollo supplies products and services as a subcontractor.

Business Area	Description
Manufacturing and fabrication	Structural steel fabrication, welding, processing, surface preparation, coatings coordination, dispatch and associated workshop activities.

Project delivery	Project management, site coordination, installation and erection of steelwork, subcontractor coordination and client interface activities.
Technical and support services	Drafting and shop drawings, estimating, procurement, quality management, safety management, finance, administration, HR and business support.
Workforce	Direct employees, supervisors, project managers, workshop personnel, administrative staff and approved subcontractors engaged to support project delivery.

Apollo's key supply chains include:

- Steel sections, steel plate, fasteners, consumables, welding supplies, surface coating products and fabrication materials.
- Subcontracted services such as drafting, installation, craneage, transport, galvanising, specialist processing and third-party testing.
- PPE, uniforms, tools, equipment, IT hardware/software, professional services and general business supplies.
- Logistics and site services required to deliver fabricated steel to construction sites.

4. Modern Slavery Risk Assessment

Apollo recognises that modern slavery risk may arise in operations and supply chains, particularly where goods are imported, labour is outsourced, recruitment arrangements are unclear, or supply chains are complex. Apollo will consider these risks in a manner proportionate to the nature of the goods or services and the information reasonably available.

Supply / Operation Area	Risk Rating	Risk Rationale and Controls
Direct Apollo employees	Low	Australian-based employment, payroll and supervision arrangements. Controls include employment contracts, payroll processes, applicable award or industrial compliance, HR processes and management oversight.
Australian professional services and technical services	Low	Generally lower risk due to Australian legal and professional service arrangements. Controls may include supplier approval and contract management proportionate to the engagement.
Australian steel, fabrication materials and consumables	Low to Moderate	Local supplier engagement is generally lower risk, although products may contain imported inputs. Apollo may seek information from significant suppliers where a material risk is identified.
Subcontracted site installation, labour, craneage and transport	Moderate	Risk may arise through subcontracting chains, labour hire, migrant labour or unclear employment arrangements. Controls include relevant prequalification, licences, insurances, site requirements and supervision.
PPE, uniforms, tools, IT equipment and imported goods	Moderate	These categories may involve international supply chains and higher-risk manufacturing locations. Apollo may use established suppliers where practical and consider further enquiries where warning signs or material risks are identified.
Overseas suppliers or goods from high-risk countries/sectors	High	Higher risk may arise where labour protections or supply-chain visibility are limited. Apollo may seek further information,

		management approval or alternative sourcing where reasonable assurance is not available.

5. Actions to Assess and Address Risk

Apollo applies a practical, risk-based approach. The level of review undertaken will be proportionate to the supplier category, value and nature of the engagement, labour intensity, country of origin, subcontracting complexity and any identified warning signs.

Control Area	Apollo Action
Supplier approval and onboarding	New or higher-risk suppliers may be reviewed before approval to the extent reasonably proportionate to the engagement. Checks may include business details, insurances, licences and relevant workforce or supply-chain information.
Supplier information requests	Where appropriate, Apollo may request information from a supplier about its approach to complying with applicable laws and identifying modern slavery risks.
Procurement controls	Employees with purchasing responsibilities should use approved suppliers where reasonably available and escalate identified concerns before engaging a supplier.
Contract and purchase order expectations	Apollo may include requirements relating to legal compliance, ethical conduct, record keeping and cooperation with reasonable information requests where appropriate to the engagement.
Higher-risk supplier escalation	Where a potential material risk is identified, Apollo may seek further information or management approval and consider corrective action, alternative sourcing or review of the supplier relationship.
Awareness	Apollo seeks to ensure employees with purchasing responsibilities are aware of this Policy & Statement and the process for reporting suspected concerns.
Response to concerns	Where Apollo identifies a potential modern slavery concern, it may consider the safety of affected people, assess the available information and take action that is reasonable and appropriate in the circumstances.

6. Roles and Responsibilities

Role	Responsibility
Board of Directors	Approve this Policy & Statement and provide oversight of material modern slavery risks brought to the Board.
Managing Directors / Senior Management	Support implementation of proportionate procurement controls and ensure material concerns are appropriately escalated.
HR & Safety Manager	Maintain this Policy & Statement, coordinate awareness and support the assessment or escalation of reported concerns.

Procurement / Purchasing Personnel	Apply applicable supplier approval processes, consider available information and escalate identified material concerns.
Project Managers and Site Supervisors	Observe subcontractor conduct and report labour-related concerns identified during project delivery.
Employees	Act lawfully and ethically, follow applicable procurement requirements and report suspected modern slavery concerns.

7. Supplier Expectations

Apollo expects suppliers, subcontractors and service providers to comply with applicable laws and conduct their business lawfully and ethically. Where relevant to the goods or services supplied to Apollo. Apollo expects suppliers to maintain practices consistent with applicable laws, including to:

- comply with applicable modern slavery, employment, workplace health and safety, immigration and industrial relations laws;
- not engage in forced labour, child labour, debt bondage, human trafficking, deceptive recruitment or other unlawful exploitation;
- not use coercion, threats or unlawful retention of identity documents, and allow workers to leave employment in accordance with applicable law;
- pay lawful wages and maintain records required by applicable law;
- take reasonable steps to manage labour providers and subcontractors used in delivering goods or services to Apollo;
- notify Apollo of any known or suspected modern slavery issue materially connected with goods or services supplied to Apollo; and
- cooperate with reasonable requests for information where Apollo has identified a potential modern slavery risk or concern.

8. Reporting and Remediation

Employees should report any suspected modern slavery concern to their manager, the HR & Safety Manager or senior management. Suppliers may raise concerns through their Apollo contact. Indicators may include coercion, threats, unpaid wages, restricted movement, withheld identity documents or unexplained labour arrangements.

Apollo will consider reported concerns within a reasonable timeframe and handle information sensitively. The response will depend on the nature and seriousness of the concern and may include seeking further information, obtaining advice, requesting appropriate corrective action, reviewing the supplier relationship or notifying relevant authorities where required or appropriate.

9. Assessing Effectiveness

Apollo may assess the practical operation and effectiveness of this Policy & Statement by considering, where relevant:

- whether identified higher-risk suppliers or categories have been considered before engagement;
- whether material supplier concerns have been escalated and addressed;
- whether employees with purchasing responsibilities have been informed of the reporting and escalation process;
- any modern slavery concerns raised and the actions taken in response; and
- whether this Policy & Statement requires amendment following changes to Apollo's operations, suppliers or applicable law.

10. Review and Consultation

Apollo intends to review this Policy & Statement annually and may review it earlier where considered necessary due to a material change in Apollo's operations, supply chains or applicable legal requirements. Where Apollo operates through controlled entities relevant to this document, those entities may be consulted as appropriate during the review.

11. Ongoing Governance Measures

Focus Area	Governance Measure
Supplier due diligence	Where considered appropriate, Apollo may obtain reasonable information from suppliers to assist in identifying potential modern slavery risks.
Supplier management	Where appropriate, Apollo may consider modern slavery risk when engaging new suppliers or reviewing existing suppliers where a material risk is identified.
Awareness	Promote awareness of this Policy & Statement among employees with purchasing responsibilities and communicate available reporting channels.
Reporting concerns	Apollo may consider reported or suspected modern slavery concerns and take action that is reasonable and appropriate in the circumstances.
Annual review	Apollo intends to review this Policy & Statement annually and may update it where there are material changes to Apollo's operations, supply chains, risks or applicable law.

12. Board Approval

This Modern Slavery Policy & Statement was authorised by the Board of Directors of Apollo Fabrication Group

Board Minute No.	220726	**Board Meeting Date**	21/07/2026
Approved By	Nathan Jackson	**Position**	Director
Signature		**Date**	21/07/2026
Review Due	22/07/2027	**Document Owner**	HR & Safety Manager