

2025

Modern Slavery Statement

ABOUT THIS STATEMENT

This Modern Slavery Statement (Statement) has been prepared in accordance with the Australian Modern Slavery Act 2018 (Cth). It describes the risk of modern slavery in our operations and supply chains during the period 1 July 2024 to 30 June 2025 (the Reporting Period). It also details the steps that the business has taken to minimise the risks of modern slavery and explains the effectiveness of those steps.

RSGx Holdings Pty Ltd, the parent company, and its related entities (collectively, RSGx) have prepared this Statement as a joint statement in compliance with the Modern Slavery Act 2018 (Cth) (Modern Slavery Act). This Statement covers RSGx Holdings Pty Ltd (the holding company in the RSGx group) and all its controlled entities, as defined under the Modern Slavery Act, being:

- ✓ Resource Services Group x Pty Ltd
- ✓ Resource Services Group E&I Pty Ltd
- ✓ RSGx Engineering Pty Ltd
- ✓ Allied Power Pty Ltd
- ✓ Itech Corporation Pty Ltd
- ✓ Baldja RkW Pty Ltd
- ✓ RSG Assets Pty Ltd
- ✓ CNF iTech Pty Ltd
- ✓ BEC Engineering Pty Ltd
- ✓ CNF & Associates Pty Ltd
- ✓ Baldja SA Pty Ltd

Our mission is to be a trusted partner providing innovative M&E construction and engineering solutions while delivering positive outcomes for our clients, employees and community - ensuring projects are delivered safely, on time and efficiently.



The core values of RSGx are reflected in the synonym "CLIC", meaning "Care | Lead | Integrity | Commit".

C

Care

We respond to the needs of communities and clients with whom we engage, whilst supporting our employees' aspirations

L

Lead

We encourage innovation, leverage technology and use industry learnings to continuously improve the way in which we deliver

I

Integrity

We do what we say we will do and support it by providing clear visibility to our partners, clients and employees

C

Commit

We undertake our works with an attitude of willingness and enthusiasm to deliver on our vision, mission and goals

Our approach is to work in synchronisation with our suppliers, clients and our other stakeholders to operate ethically and in a manner that minimises the risks of modern slavery in our operations and supply chains.

CONSULTATION AND ENGAGEMENT

RSGx is an integrated group, with policies, systems and procedures that apply across the entire business. RSGx is governed by a Board of Directors (the Directors of RSGx Holdings Pty Ltd) that manages modern slavery risks within the business operations and supply chain from the top down, ably supported by executive leadership and senior management teams (senior managers and team leaders within the business).

Policies, systems and procedures of RSGx apply to all entities within the group and day to day adherence with them is managed by centralised service functions in procurement, finance, human resources and legal.

During the Reporting Period senior leaders of the controlled entities and of the centralised service functions serving the controlled entities were consulted on the effectiveness of these controls in identifying, managing and mitigating modern slavery risks.

Representatives from the centralised service functions have informed and contributed to the development of this Statement. Following receipt of their inputs the legal services function finalised the content of this Statement, which was then provided to the Board of Directors for approval.

OUR STRUCTURE AND OPERATIONS

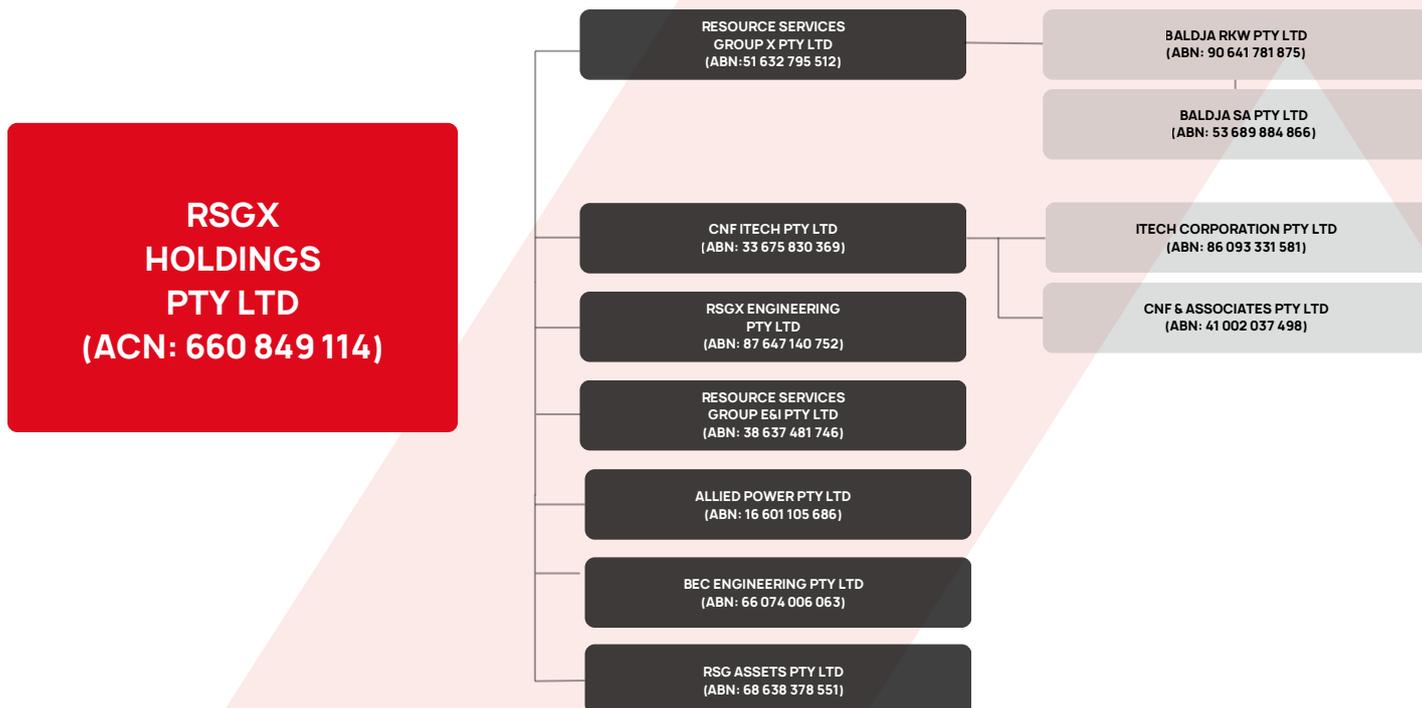
Our Structure

RSGx Holdings Pty Ltd and its controlled entities, comprise the following companies within the group:

- ✓ Resource Services Group x Pty Ltd
- ✓ Resource Services Group E&I Pty Ltd
- ✓ RSGx Engineering Pty Ltd
- ✓ Allied Power Pty Ltd
- ✓ Itech Corporation Pty Ltd
- ✓ Baldja RkW Pty Ltd
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- ✓ Bec Engineering Pty Ltd
- ✓ CNF & Associates Pty Ltd
- ✓ Baldja SA Pty Ltd

Noted: BEC Engineering Pty Ltd and CNF & Associates Pty Limited were acquired by RSGx Holdings Pty Ltd in the later half of the Reporting Period and although operated as separate corporate entities, they were transitioned to operate under the centralised systems, policies, and procedures of RSGx.

Our current corporate structure is set out below:



Our Operations

RSGx is a provider of innovative, multidisciplinary and integrated mechanical and electrical solutions in the transport infrastructure, oil and gas, resource and minerals, renewables, transmission and distribution and water industries in Australia. RSGx provides a suite of service solutions to our valued partners, throughout the project management lifecycle from front end engineering and design, construction, completions, commissioning and start-up, through to maintenance, occupations and shutdowns.

RSGx operates nationally, with its corporate head office in Rydalmere, New South Wales, and with other regional offices throughout Australia.

APAC Locations >

Australian Head Office

Unit D, 10-16 South Street
Rydalmere NSW 2116

Regional Offices

Perth WA
Port Hedland WA
Brisbane QLD
Sydney NSW
Cooma NSW
Melbourne VIC
Adelaide SA



All construction contracts entered into with clients and performed by RSGx are entered into by its controlled entities (as defined under the Modern Slavery Act).

Our Employees

On 30 June 2025, RSGx's workforce comprised of 1000 employees. 100% of our workforce is based in Australia, other than a back office and support service arrangements in Kuala Lumpur, Malaysia, and Ho Chi Min, Vietnam.

All employees are employed on permanent, fixed term, part time or casual employment agreements and/or on terms under enterprise bargaining agreements that conform with the requirements of the Fair Works Act and National Employment Standards, providing for appropriate hours of work, remuneration and leave entitlements.

RSGx also utilises labour from organisations that specialise in the provision of labour hire services under labour hire agreements that comply with the relevant regulations.

The terms of these arrangements prohibit modern slavery practices and therefore substantially reduce RSGx's modern slavery exposure.



Our Subcontractors

RSGx has approximately 30 subcontractors working on its projects at any one time and most of these contracts are with small to medium enterprises, in its core Australian market. Some of these subcontractors have their own subcontractors and suppliers performing some of their works, all of whom are required under the terms of RSGx's standard forms of subcontract, to be pre-approved by RSGx.

During the reporting period, and in performing its projects within Australia, RSGx has received technical and administrative support from services providers in Malaysia and Vietnam. The contracts for this technical and administrative support are based upon and aligned with the standard forms of contract used by RSGx here in Australia, meeting or exceeding state and federal standards. These contracts are managed and administered from here in Australia, reducing the risks of modern slavery.

People and a respect for human rights is at the core of who we are at RSGx. This philosophy has been extended to those who work for and represent our customers, suppliers, the indigenous community and to all communities which comprise part of our ecosystem.

Our commitment under the Modern Slavery Act is has been ingrained in our entire ecosystem, where we identify the risks; beyond just those to our immediate operations but to the entire supply chains that delivers much of the value that we provide.

Significant investment has been made into our people, systems and controls. RSGx is committed to sourcing goods and services from only those suppliers who share a similar ongoing commitment and respect for ethical business practices and the rights of workers.

OUR SUPPLY CHAIN & MODERN SLAVERY RISKS

In performing project works, RSGx has options to either self-perform those works with its own highly accomplished employees, or to utilise preferred subcontractors to perform those works. Alternatively, RSGx adopts a mix between the two to perform project works. RSGx maintains control over the performance of the subcontractors and suppliers it commissions and contracts with, including timeliness of delivery and quality.

Where RSGx outsources work to subcontractors that have subcontracted some of those works to their own downstream subcontractors, RSGx is not always briefed with the terms and conditions of those subcontracts. However, RSGx manages that exposure by requiring those downstream subcontracts to be with pre-approved subcontractors and suppliers and requiring those subcontracts to have appropriate Modern Slavery provisions within them.

In sourcing goods and services including plant and equipment hire, professional services and various components and materials, RSGx primarily sources through well-known Australian-based businesses, well established brands meeting stringent quality standards, with a mix of local and offshore manufacturing facilities.

This acknowledges that various components and materials, although sourced in Australia, comprise components and materials that have been manufactured or assembled overseas. This includes distribution boards, transformers, electronics (such as meters and switch boards) and cables. These components are sourced and acquired through reputable Australian wholesale and retail businesses, selling reputable global brands.

This creates the additional risks of an extended supply chain into other jurisdictions, including modern slavery risks associated with the sourcing of raw materials, manufacturing, transportation, wholesale and retail. RSGx has prepared 'risk maps' of the jurisdictions towards the extremity of its supply chains and monitors the 'Department of Foreign Affairs and Trade' website for additional risks associated with these jurisdictions. Further due diligence includes country of origin enquiry, provision of financial reports, and other supplier assessment criteria.

RSGx uses accounting and project management systems to manage its project performance, acknowledging there is always a risk that someone in the extended supply chain that brings the benefits of these systems to RSGx is exposed to modern slavery risks. To offset the risk RSGx has sourced its systems from reputable companies and brands.



OUR GOVERNANCE FRAMEWORK

The executive leadership team is responsible for developing and approving the groups environmental, social and governance strategies which have at their foundation the prevention of modern slavery and the protection of human rights. Delegated executives within the team are responsible for overseeing modern slavery, governance and risk.

The executive leadership team is supported by the centralised service functions (procurement, finance, human resources and legal) who are instrumental in implementing the policies, procedures and controls that mitigate against modern slavery risk within our business.

The legal function monitors and measures the efficacy of the policies, procedures and controls as part of the 'Legal Compliance Framework', which specifically includes reporting on modern slavery compliance (materials and updates) to the executive leadership team which meets weekly.

Policies & Procedures

RSGx's Legal Compliance Framework includes policies and procedures (materials and updates) that combine, to manage Modern Slavery risk:

- ✔ **Modern Slavery Human Trafficking Policy:** a policy aligned with the requirements of the Modern Slavery Act that applies to all employees, suppliers and subcontractors of RSGx. It establishes our commitment to eliminate modern slavery, human trafficking and summarises the controls in place to achieve this.
- ✔ **Human Resources Policies:** policies that govern the employment relationships with our employees and to selected subcontractors. These policies are designed to create a positive and transparent work environment based on fairness and compliance. They cover specific elements such as recruitment, performance management, grievance management, training and development and regulate entitlements around leave, flexible working arrangements, and employee benefits.
- ✔ **Competition and Consumer Policy:** a policy that regulates and promotes fair trading between competitors while also ensuring consumers are treated fairly. Its primary objective is to prevent unfair business practices such as misleading and deceptive conduct and false and misleading representations. This policy feeds into RSGx's minimum expectations for ethical behaviours of our suppliers ensuring that in trade and in commerce they do not make false, misleading or deceptive comments or act in a manner that is likely to mislead or deceive.
- ✔ **Whistleblower Policy:** provides a reporting framework for reporting concerns about modern slavery in our operations and supply chain. The Policy facilitates the disclosure of any wrongdoing or misconduct in our working environment, and has established internal processes to ensure disclosed matters are quickly investigated and resolved, in an independent and anonymous manner that protects and supports whistleblowers.

Compliance with these policies is subject to regular audit and reinforcement as part of the Legal Compliance Framework. These policies in combination with our Code of Business Conduct and Ethical Sourcing Policies collectively establish the minimum standards of operation with regard to managing Modern Slavery risks in our organisation, ensuring proper treatment of workers, workplace safety, fair pay and employment conditions.

Ethical Sourcing

The key principles contained within these 'ethical sourcing policies' are extended to pre-approval and pre-qualification disciplines that have been adopted by the business to assess and approve new subcontractors and suppliers. This includes a supplier pre-approval or pre-qualification questionnaire that contains specific questions regarding the degree to which the supplier and its supply chain complies with the modern slavery requirements.

The questionnaire contains questions in relation to the supplier's or subcontractor's modern slavery policies and procedures and identified modern slavery risk factors. Only once evaluated against a set criteria and approved as compliant, are subcontractors and suppliers included in the Approved Vendor Register.

Our standard form supply agreements and subcontracts contain obligations to comply with national laws, principles of fair competition and trading and international conventions to protect the interests of employees. This requires suppliers and subcontractors to have procedures in place to support compliance with modern slavery laws within their supply chains, and to notify us of identified modern slavery risks.

Subcontractors and Suppliers on the Approved Vendor Register are subject to periodic reviews and reassessments to determine the extent to which they have continued to comply with their modern slavery obligations - ensuring that no Modern Slavery compliance issues have emanated since the date of the original approval.

This helps to achieve better supplier cooperation and alignment, facilitating greater supply chain integration and long-term supply chain relationships, with partners that share our ethics and values. Our cornerstone processes comprise:

1

Our procurement pre-qualification process for identifying/ onboarding new suppliers and subcontractors, ensuring adequate disclosure and identification of modern slavery risks disclosures.

2

Adherence to our standard terms of supply and subcontract to ensure compliance with the warranties and obligations with regard to modern slavery compliance.

3

Targeted training to 'Procurement Coordinators' to ensure they understand the pre-qualification process (policies, forms and procedures).

4

Regular reviews of subcontractors and suppliers listed on the Approved Vendor Register to determine the extent to which disclosures are up to date.

HR Controls

RSGx protects the labour standards and human rights of its employees through its human resources policies and recruitment practices.

Most of our employees are employed directly, with their employment terms and conditions set out in employment contracts governed by Australian employment laws and relevant awards. All recruitment is managed through a centralised recruitment function, which includes ensuring that candidates' are appropriately vetted prior to offers being made, and the onboarding of successful candidates.

Remuneration for all employees is reviewed annually. All permanent employees are given the opportunity to participate in an engagement survey several times a year. This complements the existing grievance reporting mechanisms in place under the Whistleblower Policy.

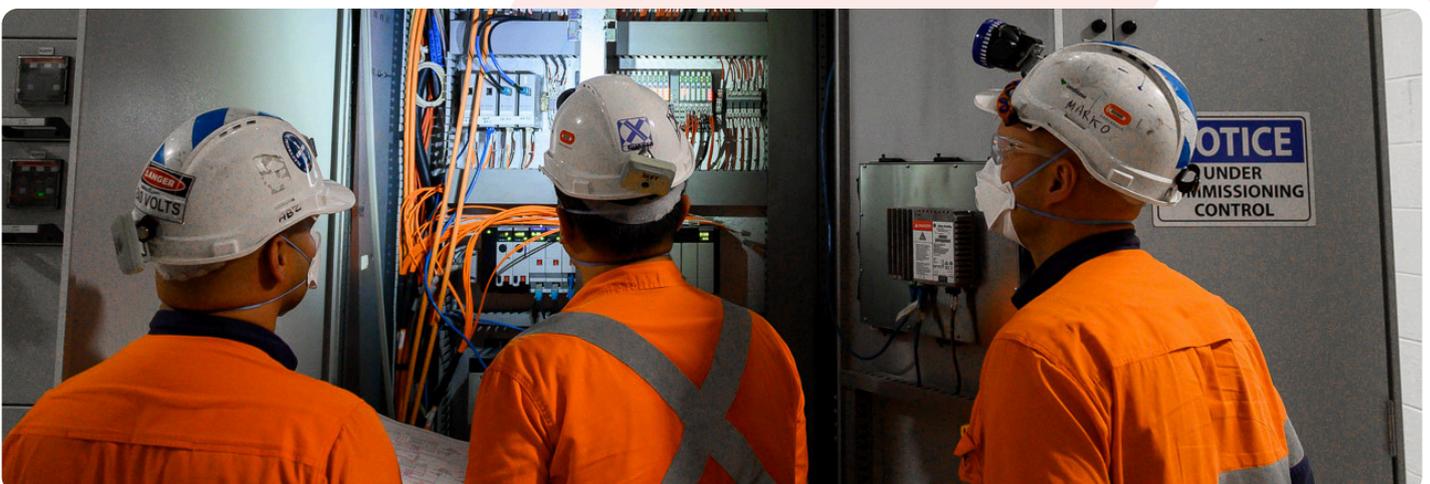
Training & Reinforcement

RSGx provides a mix of training through direct face to face presentations and online, as part of our Legal Compliance Framework. This includes modern slavery awareness, helping employees to identify and manage modern slavery risks. This is supplemented by training specific to other policies and procedures, including our Whistleblower Policy.

Following updates to our policies and procedures during the last Reporting Period to strengthen our response to modern slavery risks within our operations and supply chains, RSGx has undertaken further targeted training on those updates to our project teams.

This, in combination with our grievance reporting processes and our ongoing monitoring and auditing of compliance mean the risk of modern slavery within our operations has been minimised and remains at a reduced level. The internal Whistle-blower processes continue to play a key role in providing the opportunity to highlight modern slavery non-compliances, particularly as it relates to the recruitment processes and onboarding of new employees.

The front-end processes for the onboarding of new suppliers and subcontractors remain a core function managed by our 'Procurement Coordinators' who are at the front-line of managing the risks of modern slavery. The composition of the team of Procurement Coordinators has been strengthened through new recruits focussing on the administration of those front-end processes.



The review of procurement activities on our projects has focused on the extent to which our 'Procurement Coordinators':

- ✔ Have appropriately assessed the risks of modern slavery responses contained in the pre-qualification questionnaires used to onboard new suppliers: and
- ✔ Are using our pre-qualification evaluation criteria for the assessment of the pre-qualification questionnaires and guidelines.

This has included a review of the responses to the annual Compliance Questionnaire revealing further information from those employees responsible for operational performance of the business and an audit and review of the modern slavery disclosures of the 10 biggest suppliers into the business.

Following this review the following actions were taken during the Reporting Period to improve our processes:

1

Preparing process maps for pre-qualification of suppliers and the subsequent audits of suppliers in the Approved Vendors Register.

2

Replacing our old procurement platform with a new system that will serve as the central procurement platform across RSGx, including the Approved Vendors Register.

3

Delivering targeted training to our 'Procurement Coordinators' to ensure their compliance with the pre-qualification process, using the new procurement platform.

4

Following the review of subcontractors and suppliers listed on the Approved Vendor Register, as part of the transition to the new procurement platform, updated and corrected disclosures in the new system.

5

Carried out interventions to ensure compliance with the pre-qualification evaluation process by 'Procurement Coordinators' (i.e. ensuring timeliness and accuracy).

EFFECTIVENESS OF ACTIONS

The analysis of the results of our actions during the Reporting Period conclude that the risk of modern slavery has remained low:

- ✔ The results to the audits of existing suppliers during the Reporting Period, have not raised any concerns regarding modern slavery compliance.
- ✔ None of the new suppliers responding to our pre-approval or pre-qualification questionnaires during the Reporting Period have raised areas of concern relating to modern slavery risk.
- ✔ Our 'Procurement Coordinators' have not approved any suppliers during the Reporting Period other than those that are well-known Australian-based businesses sourcing reputable brands.
- ✔ Inspections at source manufacturing facilities and discussions in China have not raised any concerns regarding modern slavery compliance.
- ✔ A review of modern slavery disclosures of RSGx's 10 largest suppliers has not revealed any issues regarding modern slavery compliance.
- ✔ No issues regarding modern slavery risks have been reported or raised by our employees as a grievance during the Reporting Period.
- ✔ In response to our direct consultations with our 'Procurement Coordinators' during the Reporting Period, no issues of supplier non-compliance with modern slavery requirements have been raised.
- ✔ The risk maps have confirmed that the risk of modern slavery, even on our higher risk supply categories, and the longest supply chains, remains low.

RSGx primarily relies on the accuracy of disclosures made by its supply chain participants to confirm modern slavery compliance positions, particularly in relation to material inputs at the extremities of the supply chain. During the reporting period, this was augmented by undertaking some first-hand inspections of source manufacturing facilities.

In summary, RSGx is of the belief that adherence with our policies and procedures has minimised the risks of modern slavery across our supply chains. In our never-ending pursuit for excellence, further changes have been identified and recommended for 2026, changes we are sure will continue to strengthen RSGx's ability to detect and respond to incidents of modern slavery in our operations and supply chains.

IMPROVEMENTS FOR 2026

In 2026 greater emphasis will be placed on imbedding core disciplines, including:

- ✔ Enhancing our policies and processes aligned with the new process maps for pre-qualification of suppliers and the subsequent audits of suppliers in the Approved Vendors Register (Project and Non-Project related procurement).
- ✔ Imbedding compliance with the new process maps and processes through customised training.

- ✔ Further centralisation of the procurement function to improve adherence with policies and processes and supplier pre-qualification and onboarding processes.
- ✔ Developing MS Teams workflows in planner for every scope connected to Sharepoint for centralised data management and record keeping.
- ✔ Implementing a real-time 'red-flag mechanism' - system-enabled to sideline procurement activities with non-conforming suppliers.
- ✔ Completing the full transition of the newly acquired operating entities into the procurement system, policies and procedures.
- ✔ Training our 'Procurement Coordinators' and project teams to conduct traceability studies on active suppliers identified as higher-risk, through the risk maps, and use of the 'red-flag mechanism'.

OUR ONGOING COMMITMENT

It is considered that these actions will extend the reach of our analysis and reduce the degree of reliance currently placed on supply chain disclosures as a primary method of validating modern slavery compliance. These actions will strengthen our processes in identifying and mitigating the risks of modern slavery.

As the full functionality of the new procurement platform is realised this promises to strengthen the risk maps and our category management. This will strongly augment our processes in identifying, preventing, mitigating and remedying actual or potential human rights infringements that comprise modern slavery.

RSGx is encouraged by the degree to which its employees have shown a willingness to report or raise concerns under our Whistleblower Policy, and their buy-in to RSGx initiatives in improving its across-the-board compliance, extending to modern slavery compliance.

RSGx intends to further centralise its procurement function to manage end to end supply chain activities where previously split between the centralised procurement function and de-centralised project teams. This will further streamline supplier setup processes and the identification of modern slavery risks. This is a particular focus for the 2026 Reporting Period.

This Statement has been made pursuant to the Modern Slavery Act 2018 (Cth) covering the reporting period 1 July 2024 to 30 June 2025, and was approved by the principal governing body, of the parent entity, the RSGx Holdings Pty Ltd Board of Directors on 6 November 2025.



Niall Conlon

Chief Executive Officer, Global
RSGx Holdings Pty Ltd
6 November 2025

Contact us

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Resource Services Group X Pty Ltd

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Electrical License SA: PGE 299620 | Electrical License WA: EC14072 | Electrical License NT: C 4093
Electrical License TAS: 785786898

Resource Services Group E&I Pty Ltd

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