

# Modern Slavery Statement

2024

LEADING THE WAY IN  
**AUSTRALIAN ENGINEERED SOLUTIONS**

[varleygroup.com](https://www.varleygroup.com)



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## Registered Office

21 School Drive  
Tomago NSW 2322

## Acknowledgement

Varley Group acknowledges and pays respect to the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and community. We pay our respects to their Elders, past, present, and emerging.



## Statement on the Reporting Entities

This statement has been published in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) (the **Act**). It identifies the steps taken by Varley Group to identify, mitigate and prevent modern slavery and human trafficking in its business and supply chains during the period 1 January 2024 and 31 December 2024.

The following Varley Group entities are considered reporting entities under the Act:

- Coign Pty Limited ACN 142 667 043;
- Varley Group Pty Limited ACN 629 995 820; and
- G.H. Varley Pty Limited ACN 000 005 318.

The Varley Group also incorporates the following subsidiaries, on behalf of which Varley Group makes a voluntary declaration:

- Varley Holdings Pty Limited ACN 008 464 935;
- Varley Property Pty Limited ACN 090 568 728;
- Varley Electric Vehicles Pty Limited ACN 124 264 035;
- Varley Services Pty Limited ACN 062 906 352;
- Varley Specialised Vehicles Pty Limited ACN 086 435 369;
- Varley Defence Pty Limited ACN 630 262 994;
- Norship Pty Limited ACN 010 555 549;
- Norsta Maritime Pty Limited ACN 648 390 130;
- Norsta North Pty Limited ACN 660 979 644;
- Varley Power Services Pty Limited ACN 097 346 435;
- SEM Holdings Australia Pty Limited ACN 130 263 544;
- Integrated Design & Engineering Solutions Pty Limited ACN 100 616 868;
- SEM Fire & Rescue Pty Limited ACN 076 347 889;
- Varley Systems Pty Limited ACN 632 375 016;
- O'Nuallain Holdings Pty Limited ACN 619 932 464;
- MBITS Pty Limited ACN 123 920 481;
- Introspectus Pty Limited ACN 619 953 187;
- E8 Group Pty Limited ACN 116 861 244;
- The Frame Group Pty Limited ACN 095 369 403;
- CQE Varley Pty Limited ACN 678 297 473;
- Custom Quip Engineering Pty Limited ACN 116 132 435;
- CQE Trailer Rentals Pty Limited ACN 126 959 046; and
- R & C Engineering Pty Limited ACN 109 706 050.

## Foreword by Managing Director

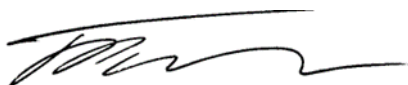
The Varley Group aspires to show leadership on serious social issues, by always doing business responsibly. We aim to protect our people and the communities and the environments in which we and our supply chains operate. Varley continuously monitors its systems and processes to ensure they are working to mitigate risks and prevent modern slavery in our operations and supply chain.

Working against modern slavery and human trafficking in all forms aligns with the core values of the Varley Group:

- We work *safely* – to ensure the welfare of our people and visitors;
- We are *customer-focused* – and aim to establish open, honest relationships with customers and suppliers;
- We ensure *quality of workmanship* – taking pride in our work to ensure we provide high quality products, services and employees;
- We *accept change* – to ensure our continuing success, we understand the need to adapt and be agile to tackle issues as they arise; and
- We aim for *success* – and work to secure continuing financial, technical and market success.

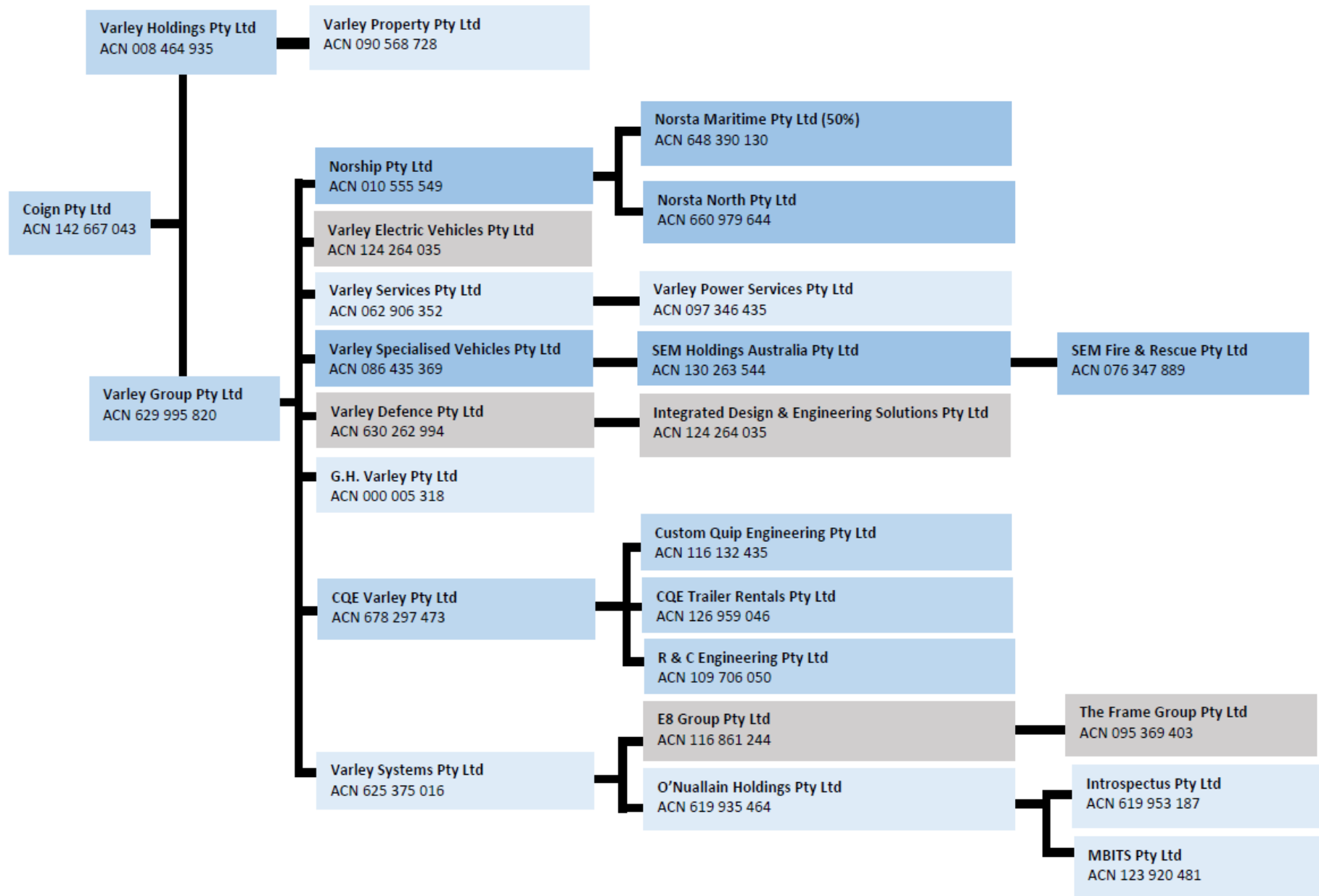
The Varley Group is fully committed to operating responsibly and establishing high ethical standards, particularly where modern slavery risks are or could be present. Modern slavery is a complex problem, and one we are cognisant of an increasing risk in, as our business grows. A number of subsidiaries have been added to the Varley Group since our last modern slavery submission, and we are working with their teams to ensure they understand the risks and incorporate modern slavery mitigation practices in their operations.

This Statement is made in accordance with the *Modern Slavery Act 2018* (Cth) and constitutes the Varley Group's Modern Slavery Statement for the reporting year commencing 1 January 2024 and ending 31 December 2024. This Statement has been approved by the Varley Group Board of Directors.



Jeffrey Phillips  
**Managing Director**  
**Varley Group**  
**4 June 2025**

# Varley Group Structure





## About the Varley Group

Founded in 1886 in Newcastle, Australia, Varley Group has grown from a small plumbing and boiler-making business into one of Australia's leading engineering and manufacturing firms. Renowned for delivering turnkey solutions, the company specialises in comprehensive asset services across sectors including defence, emergency services, healthcare, cybersecurity, mining, marine, rail, and renewable energy.

Varley is also a recognised Australian Defence Prime, adhering to the highest industry standards, backed by ISO 9001:2015 certification, Defence Industry Security Program membership and National Institute of Standards and Technology 800-171 compliance.

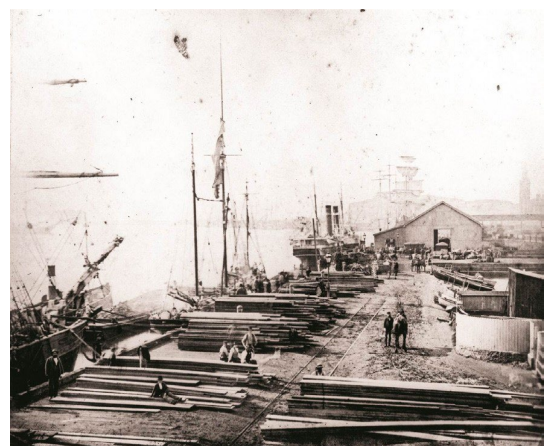
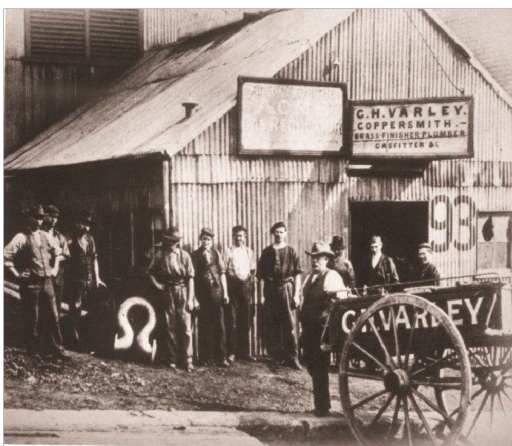
With a workforce of over 1,200 professionals and a national service network spanning more than 20 locations, Varley operates across seven major manufacturing sites, including key facilities in Tomago and Carrington. This strategic presence enables the company to deliver complex projects with speed, scale and precision.

Varley Group has four key business divisions, including Varley Defence, Varley Vehicles, Varley Services and Varley Systems. Varley has also acquired numerous brands across a diverse range of sectors, providing Varley with a significant competitive advantage and nearly limitless capabilities.

Varley Group's current customer base is wide-ranging, from individuals to governments and global corporations. Similarly, the products and services offered by Varley Group are vastly diverse.

Varley's manufacturing projects include custom emergency service, health, education and rescue vehicles, military ambulances, shelters and aviation ground support equipment, industrial and recreational electric vehicles, power plant restorations and rail maintenance works. Services offered include custom engineering and production, made-to-specification manufacturing, electrical and mechanical repairs and repeat vehicle maintenance.

Driven by a customer-focused culture and a highly skilled workforce, Varley Group continues to set industry benchmarks by delivering innovative products and engineering solutions both locally and globally.





## Varley Defence

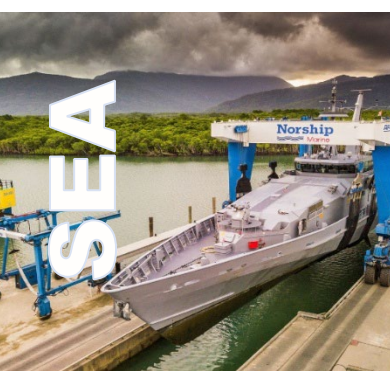
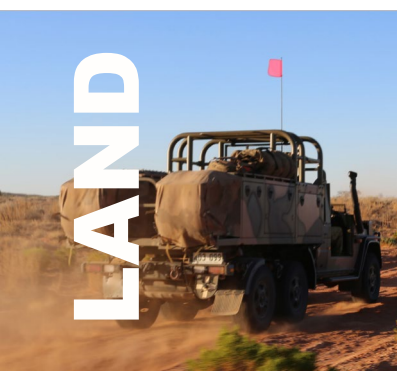
### 'Design, Manufacture and Support of Innovative Solutions'

With over 30 years of operating in the Defence section, Varley Defence has become a leading Australian engineering and manufacturing firm, achieved global recognition for its highly skilled and diverse workforce, and for delivering innovative solutions across land, air, sea, space and cyber domains.

Our business specialises in design, manufacture, integration and sustainment. Our offerings include Deployable Military Shelters, Containerised Mission and Support Systems, Specialised Vehicles and Trailers, Aircraft Maintenance Docking Systems and Ground Support Equipment, Marine Watercraft, Ship Building, Maintenance and Repair, and ACSC-endorsed INTROSPECTUS® for Essential Eight compliance.

### Major Achievements

- F-35 Program Industry participation since 2003 partnering with Lockheed Martin and Northrop Grumman
- Original Equipment Manufacturer (**OEM**) for the JSF Landing Gear Handling System and the JSF Canopy Maintenance Sling
- OEM for the ESSM (Evolved Sea Sparrow Missile) Block 2 storage and transport containers
- OEM for Deployable Force Infrastructure (**DFI**) Highly Mobile Systems, incorporating the Highly Mobile Hygiene Services System, Highly Mobile Catering System and Deployable Kennel System.
- Australian Defence Magazine's (**ADM**) 2024 Top 40 Defence Contractors achieving Rank #31 and Top 20 Exporters Rank #13
- ADM award for excellence in project management, outstanding achievement in major acquisition for the Australian Defence Surveillance and Reconnaissance Vehicles partnered with Mercedes-Benz Australia







## Varley Vehicles

### 'Vehicle Solutions that Work for your Business'

With over 60 years of dedicated industry experience, Varley Vehicles has supplied government and commercial organisations with customised vehicle solutions.

Ranging from one-off builds to whole fleets, Varley Vehicles' highly skilled team work with our customers from engineering, design, manufacture, through to delivery, ensuring all functional, operational and aesthetic expectations are met.

Developing a superlative platform in design and build methodology, Varley is recognized as providing exceptional customer focus, efficiency and quality certified products.

Our business integrates complete design, manufacturing, integrations and installation of solutions and concepts for a range of vehicles which include service trucks, utes, pods and vans, fire appliances, ambulances, health and community vans and trailers, mobile clinics, libraries and promotional vehicles, law enforcement vehicles, refrigeration vehicles, buses and coaches.

Varley Vehicles service also extends into vehicle refurbishment and testing for vehicle compliance.

### Major Achievements

- NSW Ambulance project building 1,000 Ambulances between 2017 and 2020
- Hunter Manufacturing Awards manufacturer of the year for NSW Ambulance build project
- NSW Fire + Rescue design and build of the new fleet of next generation response aerial pumper vehicles
- NSW Police Mobile Command Centre design and build
- NSW RFS new build and refurbishment project of various fire appliances. (CAT 1, CAT 6, CAT 7, CAT 9, CAT 10, and CAT 13)







## Varley Services

### ‘Servicing Industries that Empower Australia’

Varley Services encompasses a broad range of work that enable Varley to provide incomparable serviceability to the energy and resources, marine, infrastructure and transport industries as a major supplier.

Since Varley’s founding in 1886 we have continued with our initial core ship repair services which today has expanded and diversified to marine and industrial services for ship repairs and marine salvage services, rail and hi-rail builds, maintenance and certifications, power, electrical, line boring, pumps and special projects.

With our diverse workforce we draw on a vast spectrum of skilled people including technical personnel, engineers, and support staff, enabling the company to carry out work in all areas of general and specialist areas throughout Australia.

### Major Achievements

- The Hunter Region’s oldest ship repair business operating since 1886
- Y M Efficiency recovering broken and intact shipping containers, along with debris off the ocean floor, Newcastle and Port Stephens coast
- Newcastle Harbour 1,000 tonne slipway cradle fabrication and installation
- APL England vessel container and debris recovery from ocean floors and coasts off the East Coast of Australia
- Fitted approx. 1,000 automated top hatch systems to Pacific National grain rail wagon fleet, replacing old manual system which required people to physically open lids on top of the rail carriage
- Fitted an automated discharge door activation system to 200 rail wagons to service the South Australian power industry - if we were unable to deliver on time, South Australia would have had no power until we delivered





## Varley Systems

### ‘Sovereign Cyber and Technology for Government, National Critical Industries and Enterprise’

Varley Systems was founded in November 2021 to further diversify and grow Varley Group.

Through partnership with Introspectus we have quickly developed expertise in cyber, ensuring Varley Group has sovereign capability across operational domains including Land, Air, Sea and Cyber.

The acquisition of Frame Group in 2023 brought 20 years’ experience in technology, consultancy, project and managed services to Varley Systems.

Varley Systems has cyber specialists, business analysts, ICT consultants, project managers, software engineers, solution architects and systems engineers ready to serve our diverse portfolio of customers across government, national critical industries and enterprise.

### Major Achievements

- Commitment to Australian developed and owned intellectual property (IP) through partnership with Introspectus
- Introspectus provides our customers with Essential Eight assurance, actively monitoring more than 50,000 end points every day in real-time
- Expansion of our geographical reach, with offices in Sydney, Melbourne, Brisbane and Canberra; allowing us to be close to our Customers.
- Growth of our customer base which now includes customers across construction, defence, education, finance, government, health, transport and emergency services





## Subsidiary Brands

### SEM Fire and Rescue

[semfr.com.au](http://semfr.com.au)

SEM Fire and Rescue are specialist vehicle design and builders for the Australian and overseas market for front line rescue situations, including water rescue, control and a range of fire and rescue operations including, forest fire, house fires and commercial properties in and around Victoria, Australia.



### Varley Electric Vehicles - EMC

[varleyelectricvehicles.com.au](http://varleyelectricvehicles.com.au)

Varley Electric Vehicles is the largest electric vehicle manufacturer and supplier in Australia and has developed a reputation for producing and distributing world-class electric low speed vehicles and associated products.



### Norship

[norship.com.au](http://norship.com.au)

Norship have a 70 year history across the marine, manufacturing and engineering sectors. Their capabilities extend from concept, design, prototype, to construction, maintenance support through to docking, emergent repairs, complete refits and disposals.



### Integrated Design & Engineering Solutions

[ides.com.au](http://ides.com.au)

At IDES our experienced designers, engineers and project managers deliver optimum product solutions, while considering the often conflicting demands of project schedules, cost efficiency and design optimisation. IDES utilises advanced engineering and systems Integration to deliver operational capability outcomes.



### Norsta Maritime

[norsta.com.au](http://norsta.com.au)

Norsta Maritime is a partnership between Tropical Reef Shipyard and Varley-owned Norship, providing maintenance and sustainment services for Defence and commercial clients. Norsta Maritime is the Regional Maintenance Provider – North East for the sustainment of the Australian Naval fleet in Cairns.



### Norsta North

[norsta.com.au](http://norsta.com.au)

Norsta North is a wholly-owned subsidiary of the Varley Group, and sister organisation to Norsta Maritime, that provides maritime sustainment expertise to the northern regions of Australia. Norsta North is the Regional Maintenance Provider – North for the sustainment of the Australian Naval fleet in Darwin.

### Introspectus

[introspectus.com.au](http://introspectus.com.au)

Introspectus is powerful cyber security and data analytics software that provides organisations of all sizes with visibility into who is using applications, when they are using them, and for how long. This information can then be used by the organization to make evidence-based decisions.

INTROSPECTUS®

### Frame Group

[framegroup.com.au](http://framegroup.com.au)

The Frame Group was established in 2000 to address the demand for independent, high-quality information and communication technology services – a demand which still exists today. Frame provides the insight and clarity required to excel in today's challenging business environment.



### Custom Quip Engineering

[customquip.com.au](http://customquip.com.au)

Custom Quip Engineering (CQE) designs and manufactures custom built transport and agricultural equipment, including steel and aluminium tipping trailers, tankers, flat tops, drop decks and dollies. CQE also provide servicing, repair and maintenance to transport, agricultural and mining equipment, in-house blast painting services and heavy transport trailer rentals.





## Consultation

This Statement was developed through a consultation process across the Varley Group. A final draft of the Statement was made available to each of the reporting entities, and the majority-owned and controlled entities voluntarily reporting through this Statement, prior to lodgement and publication.

The executive team, together with key senior management team members, worked together to appropriately identify the modern slavery risks related to each entity, and to assess and address these risks if necessary. Consultation was undertaken in a cross-functional process involving the Group Chairman, Group Chief Financial Officer, Group Legal Counsel and Group People Officer, and was endorsed by all divisional CEO's.

This process included:

- Identification of the modern slavery policies utilised by all entities comprising Varley Group, ensuring they are available to all personnel employed in or engaged by those entities.
- A self-assessment questionnaire for entities and their biggest suppliers designed to support the identification of modern slavery risks and foster collaborative efforts to address these risks.
- Providing guidance on each entity's risk levels and possible action to mitigate these identified risks areas

Our broad consultation process ensures that Varley Group entities and their respective employees are aware of our commitments on modern slavery and how they can support program implementation, improve transparency, and identify areas for further due diligence.

## Mergers & Acquisitions

Custom Quip Engineering was newly acquired by Varley Group during 2024, and as such were a particular focus during the consultation process.

Modern slavery risk is considered in the process of acquiring new businesses, and assessed before Varley makes an offer to acquire an entity. These new entities are all expected to adopt Varley Group policies and practices, including our Modern Slavery Statement.

# Modern Slavery Risk Management

## ‘Our Approach’

Varley Group’s approach to modern slavery risk management is multifaceted, and guided by our policies and commitments. Our intention is to carry out due diligence in a systematic and consistent manner, and as a part of our everyday tasks in running our business.

Our due diligence is a continual process of identifying risks and impacts to people, taking action to address these risks and impacts, and accounting for how we respect human rights in practice.

### 1. Identify and assess risks

- a. Ongoing risk assessments with suppliers
- b. Conduct due diligence of potential suppliers, stakeholders and other business partners

### 2. Take action to address the risks

- a. Ensuring policies and procedures are continually reviewed and updated, as appropriate
- b. Complying with contractual obligations
- c. Supply chain monitoring

### 3. Track, analyse and communicate

- a. Reporting against Australia’s Modern Slavery Act
- b. Responding to grievances and questions raised by stakeholders including customers, employees and shareholders, as and when they arise

### 4. Training and engagement

- a. Internal training and review for the Varley Group board, as well as those employees in the Group with buying and procurement responsibilities
- b. Training including understanding workers’ rights and employer responsibilities

# Modern Slavery Risk Management

## ‘Varley Sustainability Program’

Varley Group’s activities this year were centred on continual improvement and embedding of our modern slavery program into everything we do at Varley Group.

The program has been coined the ‘Varley Sustainability Program’, or ‘VSP’, which communicates the foundations of our respect for human rights principles, and are designed to ensure our operations and our suppliers protect these rights. Our policies support our commitment to upholding our ethical commitment to eliminating Modern Slavery within our society.

Policies are communicated to employees through the company intranet, email, training modules and other forms of multi-media (such as videos) on Varley Group’s commitments.

The VSP comprises the following:

### Modern Slavery Statement

Varley Group’s Modern Slavery Statement, which is updated annually to ensure it remains relevant and achievable.

### George

Our business operating system, known as George, which defines our standards, values, and expectations for how we operate as a business.

### Supplier Sustainability Code

The Supplier Sustainability Code outlines our standards and business practice expectations for suppliers to align themselves with, and includes provisions for preventing forced labour practices and exploitation within our supply chain;

### PreVent

Varley Group’s program and training policy which governs our whistleblower and grievance mechanisms and processes, and clearly defines our investigation and escalation processes. The policy prohibits any retaliation against those that report issues of misconduct within our operations and across our supply chain.

### Audit Process

Our modern slavery policy and audit process demonstrates Varley Group’s position in relation to zero tolerance for any form of bribery or corruption.



# Assessment of Risk of Modern Slavery

For the purposes of defining modern slavery, we refer to the Act itself which describes situations where offenders “*use coercion, threats or deception to exploit victims and undermine their freedom*”, including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, forced marriage and child labour.

Varley understands that modern slavery risks have the potential for our business to cause, contribute or be directly linked to modern slavery. We also recognise that the level of modern slavery risk in our supply chains is influenced by a range of factors, including geographic, industry, sector and product specific factors.

Varley Group has taken a multidimensional approach to the detection and prevention of modern slavery in our business operations and supply chain. During 2024 we have taken the following actions to strengthen our understanding and oversight of the risk of modern slavery:

## Staff Training

Modern slavery awareness training has been developed for Varley Group employees. This training has been rolled out to Varley Group employees in relevant roles. There is ongoing refresher training for current employees and training for new starters.

## Policies and Procedures

Varley Group's policies and procedures both inward and outward facing have been updated to incorporate modern slavery awareness, including:

- Code of Conduct
- Ethical Sourcing Guiding Principles
- Whistleblower Policy
- Conflict Minerals Policy

## Reporting

Varley Group has an established Whistleblower Policy and process which ensures that both employees, suppliers, customers and others out-with the Group can raise concerns regarding serious misconduct or improper circumstances (including illegal, corrupt or other inappropriate conduct) with protection from victimisation, harassment or discriminatory treatment.

## Procurement Documentation and Contracts

We have embedded modern slavery clauses into both our procurement and sale documentation and contract terms. Varley Group's current and prospective suppliers are asked to read and sign up to the Varley Group Ethical Sourcing Guiding Principles before they are accepted as a supplier. These principles incorporate modern slavery and are available on our Supplier and Contractor Hub on our website.

## Remediation

Where Varley Group identifies risk of modern slavery practices in its supply chain, trading with the supplier will be suspended until Varley is satisfied that the supplier has addressed and/or eliminated the risk.

## Internet

Varley Group's commitment to modern slavery prevention is included in information on our public websites for both existing and potential future suppliers.

## HR and Recruitment Practices

Varley Group has established policies and procedures to avoid modern slavery in its work force. The majority of trade staff are employed under Enterprise Agreements, while professional roles are under private contracts incorporating *Fair Work Act 2009* (Cth) provisions. All staff are permitted, if they choose, to join a union.

Due to domestic recruitment challenges, some Varley Group subsidiaries have taken steps to engage a very small number of off-shore workers to assist with administration and accounts functions. In doing so, Varley Group has utilised an Australian-based resourcing contractor that is fully compliant with Australia's modern slavery legislation, and which carries out regular audits of all its suppliers and employees. This ensures that every person engaged in work for the Varley Group, regardless of their geographical location, is compensated with fair wages and works in safe and ethical environments, with zero tolerance for forced labour, child employment, human trafficking or other similar modern slavery risks.

## Supply Chain Analysis

Procurement is undertaken on a divisional basis supported by a consistent organisational approach to modern slavery risk management with suppliers, with strategic systematic sourcing, supplier assessments and onboarding processes. Once onboarded, the business unit that has engaged the supplier is responsible for oversight, including management of any identified modern slavery risks.

Varley Group seeks to develop relationships with reputable, responsible suppliers that are committed to the highest standards of ethics and business conduct. We have mapped our supply chain, reviewing the geographical distribution of our 2024 spend with suppliers. 94% of Varley Group's spend was with Australian based suppliers. This figure has remained consistent since our previous modern slavery submission, which reflects the steady and reliable relationships curated with our suppliers.

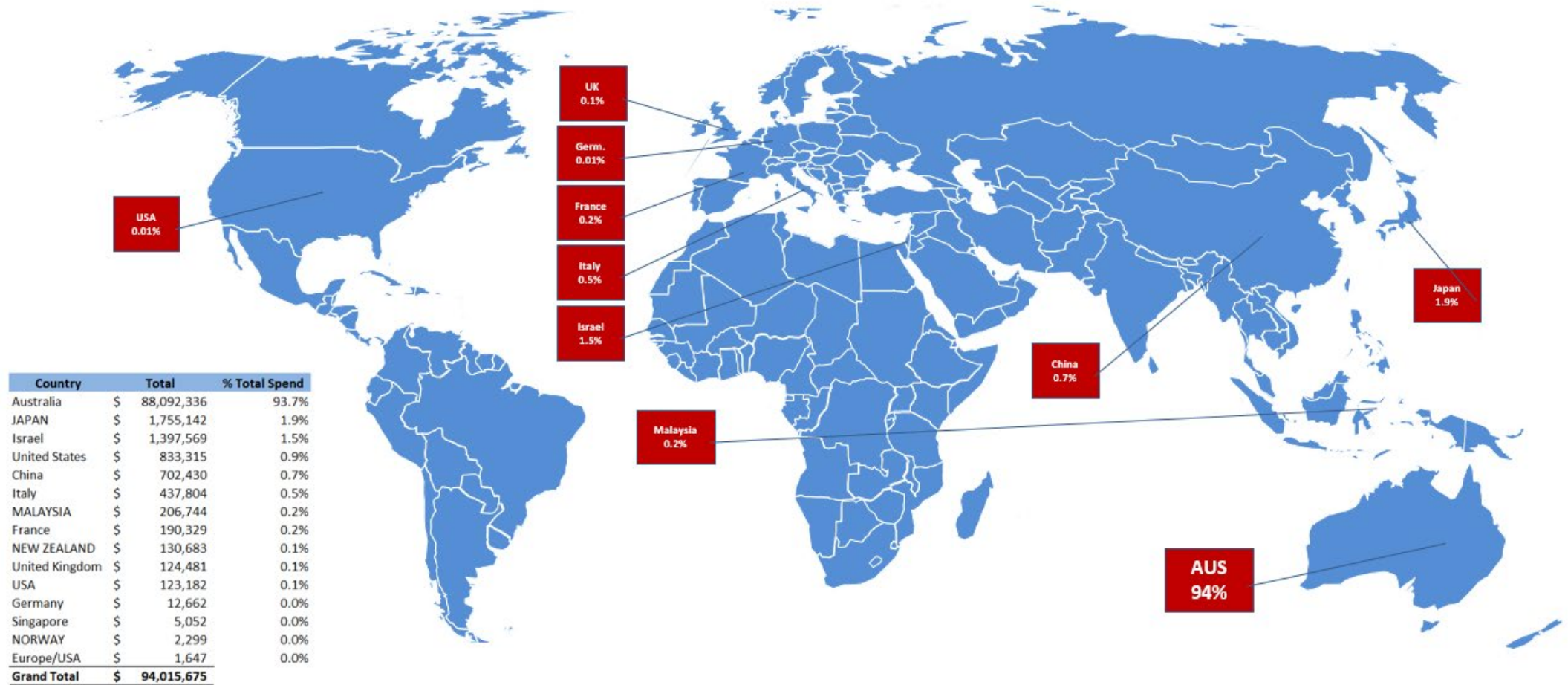
Varley Group does not currently have any first tier suppliers in countries with the highest prevalence of modern slavery or highest vulnerability to modern slavery based on the Global Slavery Index (North Korea, Burundi, Eritrea, Afghanistan, the Central African Republic, Mauritania, South Sudan, Pakistan, Cambodia, Iran, Syria, Chad, Democratic Republic of the Congo, Iraq, Yemen, Somalia, Sudan or South Sudan). We do not purchase products directly listed in the Global Slavery Index as at risk for import into G20 countries (cotton, cattle, sugarcane, gold, carpets, coal, fish, rice, brazil nuts, chestnuts, cocoa and diamonds).

In light of the above, and because of the more complex nature of the products we procure, we deem our modern slavery risk to be low. We do not have a significant risk of modern slavery within our operations or our workforce. Our internal policies and procedures are designed to provide a positive, safe working environment, ensure compliance with applicable law, and respect and protect human rights. We do recognise, however that modern slavery practices exist outside the countries and commodities listed in the Global Slavery Index and that we need to address risk not only in our first tier suppliers but also in their sub-tier supply base. We are also cognisant of the ongoing increased modern slavery risks resulting from the economic and social disruption caused by the Covid-19 pandemic, which although appears to be reducing in Australia, is still a significant issue in some other countries.

In 2023, Varley Group carried out an audit of our top 200 suppliers (by spend) via our curated Modern Slavery Questionnaire. All responses were reviewed in detail through a desktop audit, and no concerns identified. Although we have not repeated this exercise during 2024, our supplier range has not significantly altered, so we do not anticipate that there would be much variation in the results. Notwithstanding these assumptions, we intend to repeat the audit during 2025 and to carry out a desktop review. This will also ensure that we have covered new suppliers brought into Varley's corporate group via acquisition.

During 2024 we have had no reports of modern slavery breaches in our supply chain.

## Varley Group Global Supply (2024)





## Effectiveness of Approach

No reports or concerns about modern slavery and/or related issues have been received through Varley's reporting chains during 2024, and we have not otherwise identified any instances of modern slavery or human trafficking in our business or its supply chain. This is consistent with our assessment that overall, Varley Group's exposure to human trafficking and modern slavery is low.

## Future Actions to Assess Modern Slavery Risk

Modern slavery awareness and prevention is now embedded in our corporate policies and practices. Over the next year we will continue our role in modern slavery prevention and awareness through the following actions:

- Continued staff training for new and current staff, with a goal to ensure modern slavery is a topic regularly reviewed with employees
- Incorporation of modern slavery risk evaluation in our supplier audits with a particular emphasis on our supplier sub-tiers
- A heightened awareness of the risks of modern slavery when sourcing new work and onboarding new suppliers, with the aim to do business with reputable, responsible suppliers committed to high standards of ethics and business conduct
- Continuance of the effective practices implemented over the last year
- Continued vigilance throughout our operations due to the enhanced global risk of slavery due to the economic and social disruptions of conflict overseas
- Monitor the development of new laws and regulations relating to the prevention of modern slavery and human trafficking, to ensure our policies, practices and procedures remain current and compliant
- Re-evaluate our supply base through use of our Modern Slavery Questionnaire, with a particular focus on suppliers integrated through business acquisition

We believe over the last year we have made significant steps to understand and mitigate the risk of modern slavery in our business operations. We recognize, however, that this is just the beginning of our journey and the policies and systems now embedded in our business practices must be continued and enhanced over the coming years.

Varley Group is committed to ensuring no modern slavery exists in any of our operations now and in the future.