



MODERN SLAVERY STATEMENT FY25

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MESSAGE FROM THE CEO



Enviropacific endorses the principles outlined in the Modern Slavery Act 2018, recognising the grave infringements upon individuals' human rights and dignity.

We strongly oppose any exploitative practices such as human trafficking, slavery, servitude, forced labour, and debt bondage.

This FY25 Modern Slavery Statement demonstrates our ongoing commitment to eradicating modern slavery. Our approach has evolved from policy commitment to integrated, systematic management, with our systems being independently certified as robust and effective.

Our commitment extends to fostering high standards of ethical conduct and social responsibility, both within our business and our supply chains. This commitment is evidenced through our annual Modern Slavery Statement.

We affirm our dedication to combating modern slavery and ensuring that our business operations align with the values of integrity, ethics, and social responsibility.

David Tucker
CEO and Director

CREATING SAFER ENVIRONMENTS AND SUSTAINABLE COMMUNITIES

Enviropacific is an environmentally focussed services business delivering specialist engineering and applied science solutions to make our environments safer and communities sustainable.

We are a trusted, long-term provider to the public and private sectors and manage some of the most complex environmental remediation and treatment projects across Australia.

We challenge conventional thinking and leverage best practices in our design, applied science, engineering and project management. We deliver best in class, value-for-money solutions on time and budget.

Our specialist services include:

- ◆ Environmental remediation of contaminated sites and treatment of contaminated soil
- ◆ Site enabling works including demolition and hazardous waste treatment, asbestos abatement and removal, underground storage tank removal and replacement, and groundwater treatment
- ◆ Design, supply and installation of packaged drinking water and wastewater treatment plants.
- ◆ Treatment of contaminated soils, industrial waste, and liquids at our SOLVE permanent waste facility.



EVERYTHING WE DO IS UNDERPINNED BY OUR CORE PRINCIPLES

PEOPLE FIRST

We invest in our people: their safety, their work environment, and their personal and professional development.

CUSTOMER FOCUS

We deliver what we promise. We operate with integrity to provide high-quality, innovative, value-for-money solutions.

TEAM EFFORT

Together, we achieve more. We believe in leadership that builds teams, trust, respect, mutual responsibility, and genuine collaboration.

CREATIVE THINKING

We have the courage to challenge conventional thinking, to innovate and continuously improve.



REPORTING ENTITY

The reporting entity is Enviropacific Services Limited (ACN 111 372 064) whose registered office is at Level 5, 123 Epping Road Macquarie Park NSW 2113 (Enviropacific/the company/we/our).

This Modern Slavery Statement covers Enviropacific and all of its Related Body Corporates (as defined by the Corporations Act 2001 (Cth)). This Modern Slavery Statement is made according to the Modern Slavery Act 2018 (Cth).

This statement is approved by the board of directors of Enviropacific Services Limited.

OPERATIONS AND SUPPLY CHAIN

Founded in 2001, Enviropacific has grown to become a trusted, full-service provider to the public and private sectors. We are focused on providing innovative, safe, and consistent solutions to our clients' projects and challenges. To do this, we engage as early as possible with clients to capitalise on innovative project design. We then successfully execute the project, delivering a positive outcome because of our client-focused solutions.

Enviropacific is headquartered in Sydney and employs more than 316 people. Enviropacific operates exclusively in Australia and New Zealand and has a diverse customer base across a range of sectors, including Government, Defence, Mining, Oil and Gas, Property, Infrastructure and Industrial.

We have over 30 industry specific licences, which allow us to deliver our services without compromise or delay. These licences span specialist service areas including demolition, hazardous materials, waste and water treatment. Our projects span from one day emergency response to multi-year transformations.

**OVER
6,000
PROJECTS SUCCESSFULLY
DELIVERED**

**FOUNDED IN
2001**

Our business is divided into three main reporting entities, Remediation, Water, and Resource Recovery overseen by General Managers reporting through to a Chief Operating Officer and the Chief Executive Officer. The divisions are then locally controlled in geographical regions with financial and labour performance accountabilities.

As a business operating in Australia in the construction business, we perform work primarily using employees and subcontractors with some use of labour hire. We provide uninterrupted support for customers' complex projects across Australia through our specialty plant and equipment, delivered by our highly experienced team. We are able to rapidly respond to project needs, delivering bespoke solutions across projects of all types, scales, and complexities.

Enviropacific's procurement across its supply chain and operational business is highly concentrated and involves procuring the following types of goods and services, which we consider to be in the low risk categories for modern slavery practices.

Transport and disposal services	31%
Subcontractors (civil, labour, traffic control etc.)	18%
Materials, chemicals & equipment	14%
Plant and Equipment Hire	13%
Banking and Financial Services	6%
Professional consulting services	4%
Sampling & Testing	4%
Fuel and Utilities	3%
Corporate Property Leasing	3%
ICT Software Subscription and Services	1%
Vehicles and Fleet	1%
Insurance	1%
Other office and business consumables	1%
TOTAL	100%



UNDERSTANDING OUR MODERN SLAVERY RISKS

Our risk assessments to identify, assess and address the risks of modern slavery practices in our operations and supply chains over the reporting period have not identified any activities that involve the engagement of vulnerable people, migrants or base skill workers within our Australian operations. We have no high-risk business models of seasonal work, franchising, or outsourcing.

During FY25, 99.8% of Enviropacific's total spend on goods and services was with Australian suppliers. The remaining 0.2% of spend comprised international suppliers. This highly localised supply chain significantly limits our exposure to modern slavery risks.

Description	% Goods and Services Amount
Australian Supplier Spend	99.80%
International Supplier Spend	0.20%
Total	100%

Australian suppliers are governed by Australian legislation, which affords a high level of protection to Australian workers. In particular, the Australian occupational work, health and safety legislation and employment law place extensive positive obligations on Australian businesses to keep Australian workers safe and ensure that they are treated fairly. Enviropacific considers that by engaging predominately Australian suppliers, its exposure to modern slavery risks is low.

We identified labour hire as a potential risk area for modern slavery. We only engage with registered Australian labour hire companies and we rely on them to undertake due diligence on the workers they employ, ensuring that they have rights to work here, are not under any compulsion to work or in any kind of debt bondage situation. We require the labour hire companies to sign up to our Labour Hire

Agreement which includes contractual obligations and warranties to comply with modern slavery laws, not engage in any modern slavery practices and to take all reasonable steps to satisfy themselves that their supply chains do not involve modern slavery practices or risks.

We understand that risks in procurement may be heightened in some of our group's supply chains and operations as a result of the geographical locations of some global suppliers. We lack visibility of practices in certain overseas markets, and this carries additional risks of modern slavery, especially in secondary levels of our chain of suppliers and source materials used in our services.

Our overseas supplier assessment concluded the following mix of global suppliers with whom we engage:

Supplier Spend by Region	Goods/Services %
Australia	99.797%
Spain	0.157%
Georgia	0.017%
Italy	0.012%
France	0.011%
United Kingdom	0.003%
Taiwan R.O.C	0.002%
New Zealand	0.001%
Total	100%

Some materials which we purchase for use in our operations like activated carbon sourced from Southeast Asia have been identified as a product whose production carries with it the potential risk of modern slavery. We endeavour to contract with all suppliers using appropriate contracts which include warranties and obligations to avoid any modern slavery practices.

ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS IN FY25

Our strategy is twofold:

- ◆ To monitor and identify modern slavery risks through our integrated management systems, which provide our governance and reporting frameworks; and
- ◆ to actively manage risks through due diligence activities which assess and then address risks of modern slavery in our operations and supply chain.

Our key strategic actions to strengthen our modern slavery due diligence framework are detailed below.

1. Monitoring, Governance and Reporting Frameworks

We established the IMS Governance Council (IMSGC), chaired by the Chief Information Officer and comprising senior leaders and process owners. The IMSGC provides structured, senior-level oversight of our governance procedures and management system which ensure robust and structured procedures and systems are in place to manage risks, including the risk of modern slavery.

Modern slavery is now formally considered within our established organisational risk management framework. This framework, which was validated as effective in our recent ISO audit, ensures that modern slavery risks can be systematically identified, assessed, and treated alongside other operational risks. As noted in our recent integrated ISO surveillance audit, “the IMSGC provides structured oversight and drives continuous improvement across all business processes.”

2. Due Diligence activities

In FY25, we launched the Felix vendor management system, through which we undertake supplier due diligence and prequalification. This system provides a proactive filter for modern slavery risks and enables us to interrogate the type of services and industries in which our suppliers are engaged and undertake more targeted due diligence on particular suppliers who fall into an identified high risk category for modern slavery.

We now require all new suppliers to complete a prequalification questionnaire through the Felix platform and provide disclosures of relevant information before engagement. This moves our due diligence beyond retrospective contract clauses to upfront assessment. In FY25, we invited 1,785 suppliers into the platform for prequalification.

The ISO surveillance audit confirmed that “our procurement process, managed through the Felix system, includes detailed criteria for selecting external suppliers, which forms part of our due diligence on labour practices.”

3. Procurement and Supply Chain

We established a working group of senior leaders and process owners to review and refine our Procurement and Subcontracting Procedure and related procedures. This group is led by the General Counsel and Company Secretary, and is focussed on ensuring that all procurement activities within the company will include steps to undertake due diligence on our suppliers and subcontractors, using Felix to onboard suppliers as well as consideration of

social procurement issues, modern slavery, and indigenous procurement to ensure Enviropacific adopts an ethical and sustainable approach to procurement.

We developed a Labour Hire Agreement template which we use to engage any labour hire companies to ensure that they are properly registered, licensed and agree to contractual obligations and warranties to comply with modern slavery laws, not engage in any modern slavery practices and to take all reasonable steps to satisfy themselves that their supply chains properly manage modern slavery risks.

4. Policies and procedures

We updated key policies and procedures, and rolled out face to face training, on various people, governance and commercial procedures, including:

- Improving our HSEQ framework with *SIMPEL, our end-to-end project and HSEQ management platform*. SIMPEL centralises project data, streamlines HSEQ processes, and provides real-time visibility and control over operational risks.
- Updating our Code of Conduct to reinforce our commitment to human rights and underscoring the expectation that all employees and contractors act with integrity and respect in all business dealings.
- Updating our Tendering Procedure and Commercial Procedure.

5. Training and Awareness

In FY25, Enviropacific continued the rollout of MyKnowledge, an online training platform designed to ensure that all Enviropacific employees possess the necessary compliance and competence in understanding Enviropacific’s policies, procedures, and standards. The MyKnowledge program offers a variety of resources and guidance on various aspects of the business.

Mandatory online MyKnowledge refresher training was rolled out to existing staff and new staff on many topics, including the following:

- First Steps Towards a Diverse, Inclusive and Equitable Workplace
- Introduction to Diversity, Inclusion and Equity
- Anti-Bribery and Corruption Policy
- HSEQ - Injury Management and Return to Work
- Information Security Awareness
- HSEQ - Health and Safety Obligations



EFFECTIVENESS ASSESSMENT

While EnviroPacific considers its exposure to modern slavery risks to be low, we use key metrics to measure how effective our actions to identify and address modern slavery practices in any part of our operations and supply chains have been. Over this reporting period, we assessed the effectiveness of our actions across our key performance areas:

1. Monitoring, governance and reporting frameworks:

We have strengthened our integrated management system and risk management framework;

Key governance procedures and policies were reviewed and updated with the endorsement of senior management and our Board of Directors.

2. Due Diligence Activities:

We implemented the Felix vendor management system and invited 1,785 suppliers into the platform for prequalification.

3. Procurement & supply chain:

Our suppliers and subcontractors continue to be engaged using appropriate contracts which require compliance with all laws, agreement to not engage in any modern slavery practices nor permit supply chains to do so. Our supplier contracts also require compliance with our Code of Conduct and Anti-Bribery and Corruption Policy, reporting of any breaches and disclosure of relevant documents and evidence of compliance to allow auditing of compliance with these obligations.

4. Policies and procedures:

Our updates to policies and procedures, including our Code of Conduct, have been successfully rolled out and are being implemented across the business.

5. Training & awareness:

We measured our training completion statistics and found that greater than 95% internal training was completed.

6. Grievances:

No grievances or disclosures were received in relation to modern slavery risks or under whistleblower legislation.

Over subsequent reporting periods, we will continue to review these key performance areas and develop further metrics to assess the effectiveness of our actions, in order to achieve continuous improvement.

PROCESS OF CONSULTATION

EnviroPacific's Related Body Corporates do not employ anyone and are not engaged in any operational businesses. During the most recent reporting period, therefore, EnviroPacific continued to consider and address modern slavery risks within our operating business of EnviroPacific Services Limited.



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