

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT



Introduction

Protech Group (Aust) Pty Ltd ABN 38 163 904 694, its subsidiaries ("Protech") and partner entities 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.

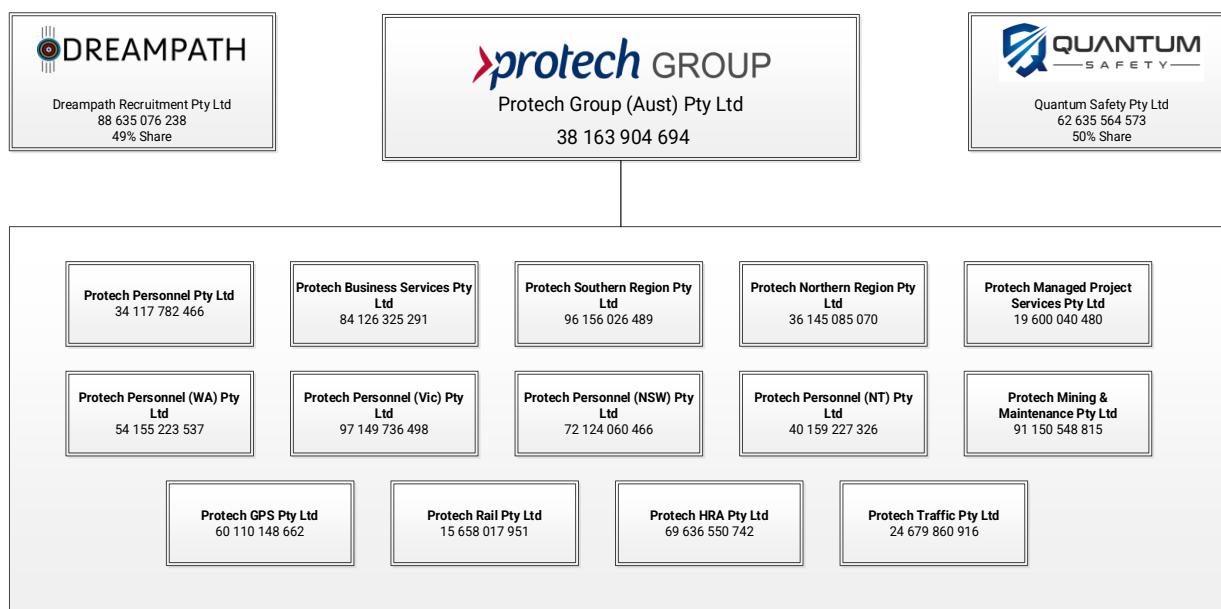
ABOUT OUR BUSINESS

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 2025 Protech employ over 4000 people through a network of more than 25 Branches in all states and territories.

Company Structure

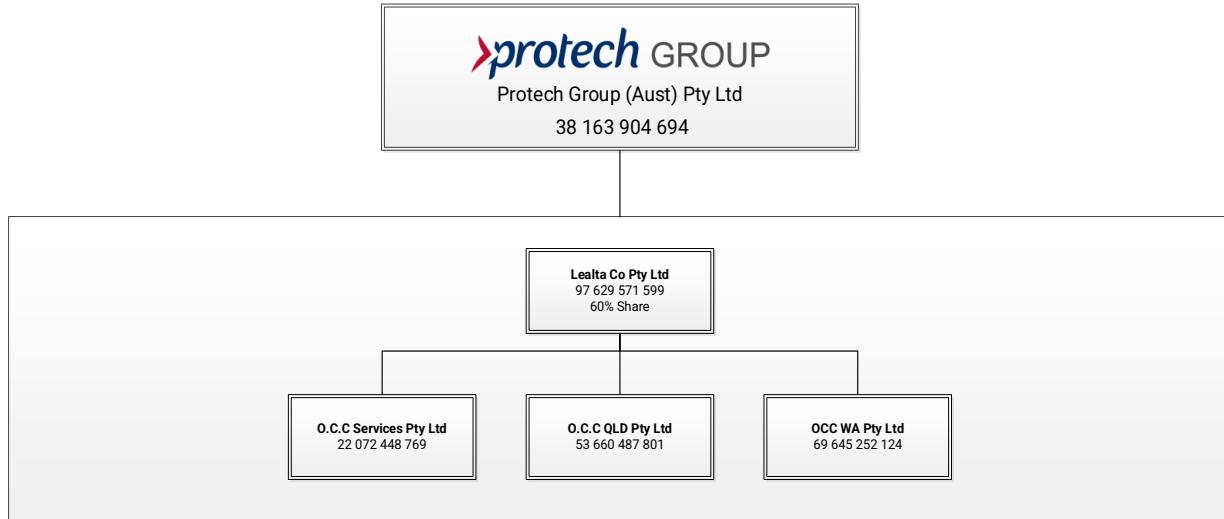
Core Protech Business



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT



Partner Entities



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
Traffic Management

Manufacturing & Services
Energy & Power
Defence

Mining
Government Services
Rail and Track Safety

A core part of Protech operations is to check work rights on all foreign workers without the retention of original documentation. Protech heavily uses the Immi portal provided by the Department of Home Affairs for all international workers. All candidates must hold a legal right to work in Australia before they can be employed, with our workforce management system proactively reporting on any pending expiry dates for visas.

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 Protech's 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 and participate in assessments and reviews by Protech.

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 trading 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, which Protech are provider(s) of business process outsourcing services, and the upstream risks in the supply of 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 identified 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. Protech commit to ensuring that:

- Employees remain 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.
- 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 proactively 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.

Protech do not provide labour to specific industries with higher risks of modern slavery. Such as:

- Agriculture and Horticulture
- Meat Processing
- Cleaning and hospitality
- Domestic services
- High-risk goods and services
- Security Services
- Personal services

Where there is the potential for supply to these industries, Protech executive management are required to approve on a client-by-client basis, and all appropriate checks will be completed on the potential client to understand the positions that Protech on-hire workforce will be placed in.

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 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 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, these are renewed cyclically to ensure currency and assess any changes.

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. While not all states and territories in Australia require a labour hire license, Protech applies the same governance framework to these areas.

Industry Body Participation

Protech are active participants with several industry bodies including the Australian Industry Group and the Recruitment, Consulting and Staffing Association (and others) where 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. This year our Chief People and Compliance Officer was invited to speak at the Infrastructure Sustainability Council (ISC) who run the Modern Slavery Coalition.

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 regularly complete and provide the required supporting evidence to justify their answers. Including any third-party modern slavery audits completed on their organisation or their supply chains.

Detailed Modern Slavery Risk Mapping

- **Upstream PPE and Uniforms:** potential risks associated with raw materials (e.g., textiles), manufacturing, and logistics across multiple tiers.
- **International Business Process Outsourcing (BPO):** jurisdictional labour risk, recruitment practices, and worker protection in offshore service centres.
- **External Applicant Introductions:** risks with third-party agencies (e.g., Job Network Agencies, First Nation Community Programs) requiring verification of ethical recruitment practices.
- **Visa-Dependent Workforce:** exploitation indicators relating to visa expiry, coercion, or document retention (noting Protech does not retain original documentation).
- **Control focus:** where Protech owns or controls entities, risks are assessed at entity level and consolidated into group risk review.

Protech has implemented controls to minimise and where possible eliminate the risks of modern slavery being introduced via our supply chains – with proportional oversight given to areas of risk which cannot be fully eliminated.

Supply Chain Assessment Overview

Supply chain element	Key risk indicators	Controls in place	Residual risk
PPE & Uniforms	Raw material sourcing; factory labour; logistics	Supplier questionnaire; evidence review; site visits (where possible)	Medium
International BPO	Jurisdictional labour standards; recruitment fees; working hours	Onboarding due diligence; contract clauses; executive oversight, modern slavery assessment questionnaire audit.	Medium
Third-party applicant introductions	Recruitment integrity; worker documentation; fair treatment	Prequalification; ethical recruitment verification; audit sampling	Low–Medium
Visa-dependent workforce	Coercion risk; passport retention; visa expiry	Immi portal checks; workforce system alerts; zero retention of originals	Low

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.

Remediation and response framework

Protech have developed a victim-centred process to respond to any identified modern slavery instance. A high-level overview of this framework is outlined below:

Intake & Reporting: Implementing multiple reporting channels including local/national reporting mechanisms and the Whistleblower Standard which facilitate stakeholders raising any concerns with Protech.

Worker Protection: Where Protech has the ability to control or influence directly, we will take immediate steps to protect affected individuals, including access to support services and non-retaliation. As needed, we will also liaise with any applicable authority to ensure that workers are protected – including international agencies and/or authorities.

Investigation: prompt, confidential fact-finding led by authorised personnel with escalation to Executive as required.

Corrective Action Plans (CAPs): timebound actions for suppliers/partners which must be agreed to by these third parties; monitored to closure.

Disengagement Criteria: applied where remediation fails or risk remains unacceptable.

External Reporting: cooperate with authorities where legally required.

Note: To date, audits and site visits have reported no adverse findings; the framework remains ready and able to be applied should any issue be identified.

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 e-learning module which all new employees must complete as part of their onboarding. Compliance refresher training is also completed regularly, with completion rates monitored by the human resources team, and escalated as needed to senior management. Protech are committed to ensuring that 100% of client/supplier facing employees have completed this training. Should any of our employees need any additional information or support regarding human trafficking, forced labour, servitude, and slavery, they are made aware they are encouraged to ask for this information, and that it will be provided.

CONSULTATION

To prepare this statement, Protech have consulted with stakeholders across our group entities (as listed above in this document), 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 CONTINUOUS IMPROVEMENT APPROACH

Assessing the effectiveness of the actions taken

Protech will continue to complete ongoing assessments of our supply chains by regularly requesting feedback specific to their modern slavery risks, and 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.

These assessments include a risk-based approach to our supply chains, ensuring that those with higher risks of modern slavery receive proportionately more oversight. Should the supplier indicate, or it is discovered that they are addressing a risk or rectifying an identified instance of modern slavery. Protech will require quantified targets that the supplier is aiming to achieve, and any milestones associated with targets before ongoing engagement with the supplier. These targets will be approved by Protech Executive Team. The supplier will be required to demonstrate ongoing achievement of these milestones to ensure that Protech continues to engage them. The same approach will be taken should a supplier be investigating a potential instance of modern slavery, they will be required to share the findings and any actions arising from the investigation to maintain the ability to supply to Protech.

All actions planned, and milestones achieved will be communicated to the Protech executive team to gain their continued support for ongoing supplier engagement.

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:

- Engagement with newly acquired businesses to assess their modern slavery risks against Protech's risk appetites.
- Expanding understanding of partner organisations and upstream supply chains.

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- Engagement with Field Employees and clients of partner entities to promote information sharing and foster the development of a positive culture.
- Ensuring training for all employees of partner entities in Protech's approach to Modern Slavery.
- Continuation of supplier review process with members of senior management and extending the risk-based approach to ongoing reviews.
- Embedding a modern slavery assessment into any due-diligence processes for potential acquisitions to understand any current risks, challenges, or issues that an entity may be facing.
- Maintain regular and recurring timelines where suppliers are to re-complete Protech's Modern Slavery Assessment Questionnaire, and their provision of any third-party audits which they have completed on their supply lines.
- 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.
- Actively engage in a targeted program of Continuous Improvement specific to the identification and elimination of Modern Slavery within the Protech Group including reviewing the potential expansion of training opportunities.
- Leveraging industry networks to ensure that Protech is aware of emerging risks relating to Modern Slavery, and any suppliers or entities which may be wilfully disregarding their obligations.
- Ongoing work with clients to maintain open communication and awareness of emerging or changed risks in relation to modern slavery.

This statement is made pursuant to the Act and constitutes Protech's slavery and human trafficking statement in respect of the 2024-2025 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 17th December 2025.

Marc Meili
Managing Director