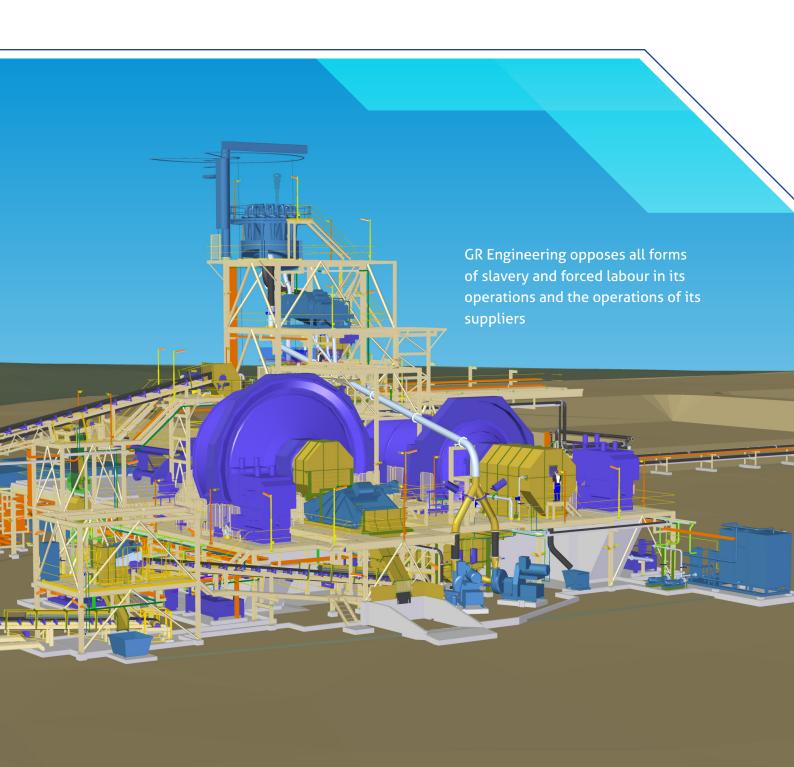


## **MODERN SLAVERY STATEMENT 2025**



### Introduction

This Modern Slavery Statement (Statement) by GR Engineering Services Limited ABN 12 121 542 738 and its controlled entities (GR Engineering or the Group) is published as required by the *Modern Slavery Act (Cth) (Act)*. GR Engineering's subsidiaries are GR Production Services Pty Ltd, Mipac Pty Ltd and Paradigm Engineers Pty Ltd. The Group has introduced systems and procedures to address the requirements of the Act.

This Statement outlines the Group's approach to ensuring that it has processes in place to minimise the risk of modern slavery within its business operations and supply chain.

### **Core Values**

The Group is founded on a strong belief in our core values. These core values drive our people and underpin the company's corporate goals of providing clients with superior service, establishing safe and effective working relationships as well as respect for the culture, diversity and values of others.

The Group's core values are:

- We strive to provide a safe, healthy and hazard free workplace
- Our clients are our focus
- A commitment to innovation and quality
- Our people are our most significant asset
- We will always act with honesty and integrity
- Respect for the community and environment in which we work

# Structure, Supply Chain and Operations

#### Structure

GR Engineering is an ASX listed company that is headquartered in Perth and has offices across Australia and overseas.

The Group provides high quality process and detailed engineering design, procurement and construction services to the mining and mineral processing industry and also provides operations, maintenance, project and advisory services to the oil and gas sector.

During FY25, the Group recorded consolidated revenue of \$479 million and employed over 1000 personnel.



#### **Supply Chain**

The Group sources a diverse range of goods and services. The top categories of supply by spend for FY25 were:

- Processing equipment
- Construction materials and consumables
- Plant and equipment hire
- Subcontractor services
- Transport, travel and accommodation

The Group typically undertakes business with pre-qualified suppliers operating under purchase order terms and conditions or negotiated subcontracts. Over time, the Group has built long term relationships with a large number of these suppliers.

During FY25, the majority of the Group's annual supplier spend occurred with suppliers and subcontractors located in Australia, noting that these companies are also subject to Australian modern slavery legislation, as applicable.

No significant changes in the supply chain occurred in FY25, compared to the prior year.

Based on the above, the Group regards the risk of modern slavery to its supply chain to be low.

#### **Operations**

The majority of the Group's employees are employed directly and under permanent, part-time or casual contracts or under Enterprise Agreements. The Enterprise Agreements in place have been approved by the Fair Work Commission.

In some instances, the direct workforce was supplemented by direct labour hire who were engaged at market rates and on standard industry terms and conditions.

Based on the above, the Group regards the risk of modern slavery to its operations to be low.





# Mitigating Risks of Modern Slavery

This is the Group's sixth year of reporting under the Act and GR Engineering is committed to ensuring it meets the obligations under the Act.

The Group has been promoting its own modern slavery policy and standard outlining its stance on modern slavery and validating our commitment to address this issue in our business and supply chain. Our policy is published on our website and states that we will:

- Respect the diverse cultures and heritages of local communities
- Respect the rights of indigenous peoples
- Respect that all personnel have a right to reasonable work conditions
- Comply with the requirements of the Act
- Not tolerate harassment or adverse discrimination

In addition, our activities will be guided by:

- The International Bill of Rights (including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant of Economic, Social and Cultural Rights); and
- The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work (which contain the eight core conventions of the ILO, including freedom of association and the right to collective bargaining).

These policies are consistent with the Group's Core Values.

The Group has also taken the following actions to assess, address and eliminate the risk of modern slavery within our operations and supply chain:

- Reviewed our preferred suppliers list including existing suppliers and did not identify any suppliers with a high risk of modern slavery in its supply chain
- New suppliers are also required to confirm compliance with the requirements of the Modern Slavery Act
- Ensured senior procurement staff were trained in the requirements of the legislation
- During board and management meetings, consulted with senior management in each of our subsidiaries, and confirmed that they are in compliance with the Act.
- Aligned employee related policies across the Group.

Through the processes described above, the Group did not identify any risks of modern slavery in its operations or supply chain for the FY25 period.

The focus during FY25 has been on expanding written confirmation of compliance with the Modern Slavery Act requirements for new and existing suppliers through the supplier re-qualification process and the Group has assessed the implementation of the Modern Slavery Policy and Standards as effective noting no issues or increased risk factors from the prior year and there were also no significant change to the Group's supply chain and operations.

## Our Future Commitments

The Group is committed to continuous improvement and as such we will focus on the following activities during FY26:

- To continue to evaluate the implementation of the Group's Modern Slavery Policy
- Expand written confirmation of compliance of modern slavery requirements to new and existing suppliers.

Phil Lockyer

Non-Executive Chairman

8 December 2025

Approved by GR Engineering Services Limited's Board of Directors on 21 November 2025





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