MODERN SLAVERY STATEMENT

2026

Apex Australasian Infrastructure & Renewable Energy Pty Ltd

Reporting period: 1 January 2026 to 31 December 2026

Prepared under the Modern Slavery Act 2018 (Cth)

Approved by the Board of Directors on 15 March 2027

Demonstration document. Apex Australasian Infrastructure & Renewable Energy Pty Ltd is a fictional entity, and every figure, name and date in this statement is illustrative. This statement has not been submitted to the Modern Slavery Statements Register.

About this statement

This is the modern slavery statement of Apex Australasian Infrastructure & Renewable Energy Pty Ltd (Apex) for the reporting period 1 January 2026 to 31 December 2026. It is prepared under section 13 of the Modern Slavery Act 2018 (Cth) (the Act) as a statement for a single reporting entity. For the purposes of criteria (c) to (f) it also covers the entity that Apex owns and controls, Apex Australasian Infrastructure & Renewable Energy (NZ) Limited (Apex NZ).

This is Apex's first modern slavery statement: 2026 is the first reporting period in which Apex's consolidated revenue reached the AUD 100 million threshold in the Act. It is a standalone document, separate from the Apex Sustainability Report 2026.

In this statement, modern slavery has the meaning given in the Act: conduct occurring in Australia or elsewhere involving slavery, servitude, forced labour, forced marriage, debt bondage, deceptive recruiting for labour or services, trafficking in persons and the worst forms of child labour. Apex does not claim that its operations and supply chains are free of modern slavery. This statement sets out where the risks may be, what Apex did during 2026 and what it plans to do next.

Where each mandatory criterion is addressed

Criterion in section 16(1) of the Act	Requirement	Section
(a)	Identify the reporting entity	1
(b)	Describe the structure, operations and supply chains of the reporting entity	2
(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that it owns or controls	3
(d)	Describe the actions taken to assess and address those risks, including due diligence and remediation processes	4
(e)	Describe how the reporting entity assesses the effectiveness of such actions	5
(f)	Describe the process of consultation with any entities that the reporting entity owns or controls	6
(g)	Include any other information that the reporting entity considers relevant	7
Section 13(2)(c) and (d)	Approval by the principal governing body and signature by a responsible member	8

1. Reporting entity (criterion (a))

Item	Detail
Legal name	Apex Australasian Infrastructure & Renewable Energy Pty Ltd
Trading name	Apex Australasia
Legal form	Privately owned proprietary company limited by shares
Place of registration	Victoria, Australia
Headquarters	Melbourne, Victoria, Australia
Corporate offices	Melbourne and Auckland
Reporting period	1 January 2026 to 31 December 2026
Why Apex reports	Apex's revenue for the reporting period, including Apex NZ, was AUD 142.5 million, above the AUD 100 million consolidated revenue threshold in the Act.

2. Structure, operations and supply chains (criterion (b))

2.1 Structure

Apex is governed by a Board of Directors. The Board has a Sustainability and Risk Committee, and the Board delegates management of sustainability impacts to the Chief Sustainability Officer (CSO). Apex wholly owns and controls one entity, Apex NZ, which is based in Auckland. Apex has no joint ventures, consortia or franchise arrangements.

2.2 Operations

Apex operates in three sectors: critical infrastructure, renewable energy project development (solar and wind) and commercial civil engineering. Its own activities are project development and construction. Operations are located in Australia and New Zealand only: in Victoria and in the North Island of New Zealand, across 4 administrative and technical sites. Apex's clients are public and private asset owners and energy developers.

Workforce, average for 2026 unless stated	Number
Employees at 31 December 2026	420
of which Victoria	294
of which New Zealand (North Island)	126
Workers who are not employees (average full-time equivalents)	240
of which permanent operational field contractors	180
of which labour-hire agency workers	60
Peak labour-hire (full-time equivalents, third quarter of 2026)	95

Apex engages the 180 field contractors directly. The 60 labour-hire workers are employed by agencies. Apex directs the work and controls the workplace of all 240.

2.3 Supply chains

Apex's supply chains are the products and services, including labour, that contribute to its projects. Its direct suppliers deliver to project sites in Victoria and the North Island of New Zealand. Apex contracts directly with its suppliers, plant hire companies, labour-hire agencies, waste contractors and subcontractors.

Category	What Apex procures	Relationship
Construction materials	Concrete, aggregates and asphalt	Supply contracts and purchase orders
Steel and timber	Structural and civil products	Purchase orders with direct suppliers; origin beyond the direct supplier is not systematically recorded
Fuel	Diesel for plant and site generators	Supply agreements
Plant hire	Hire of plant and equipment	Hire contracts
Labour hire	Agency workers on Apex-controlled sites (60 average full-time equivalents)	Contracts with labour-hire agencies; the agency employs the worker and Apex directs the work
Field contractors	Permanent operational field contractors (180 average full-time equivalents)	Engaged under direct contracts with Apex, which directs their work
Subcontractors	Specialist packages of project work. Principal subcontractors are those engaged for the largest packages	Subcontracts; the subcontractor employs its own workers and Apex does not control their workplace
Waste services	Collection, transport and processing of waste	Contracts with licensed waste contractors, reviewed annually

3. Modern slavery risks (criterion (c))

3.1 How Apex identified its risks

During 2026 Apex carried out its first scoping exercise for modern slavery risk. The CSO led it with Procurement, Human Resources, Internal Audit and Compliance and site managers. No external experts were involved. The exercise had four steps:

- **Review.** Apex reviewed existing information, including its 2026 safety data. Both high-consequence injuries involved workers who are not employees, and the 60 labour-hire workers sit outside the scope of Apex's ISO 45001 certification. Apex treats this as a reason to look more closely at the protections for these workers.
- **Map.** Apex listed its operations and the categories of products and services it buys, in the same terms as section 2.
- **Test.** Apex checked each category against four tests: the sector, the product or service, the geography and the entity supplying it.
- **Find the gaps.** Apex identified the parts of its supply chains where it has no information, and treated them as possible risk, not as no risk.

This scoping exercise is separate from, and broader than, the materiality assessment in the Apex Sustainability Report 2026, which treated the health and safety of contractor and labour-hire workers as its human-rights impact. Risk in this statement means risk to people, not risk to Apex. Apex ranked areas by how severe the harm to workers could be where that could be assessed, and treated areas with no information as priorities for data collection. It did not rank by spend. It describes its relationship to each risk using the three terms of the UN Guiding Principles on Business and Human Rights: Apex may cause modern slavery through its own operations, contribute to it through its actions or purchasing, or be directly linked to it through a business relationship.

3.2 Risks identified

Area	How modern slavery could occur	Apex relationship	Priority and reason
Labour-hire agency workers (60)	Debt bondage through recruitment fees or unlawful deductions, deceptive recruiting, forced labour. Sham contracting, underpayment and excessive hours are indicators that can escalate	Directly linked through the agency; may contribute through short-notice demand (peak 95 full-time equivalents) and cost pressure	Highest. Labour-supplied services involving manual work are a recognised risk area, workers depend on a third party for pay, and these workers sit outside the scope of Apex's ISO 45001 certification
Field contractors (180)	Sham contracting and unlawful deductions or fees that could amount to debt bondage. Underpayment and excessive hours are indicators that can escalate	May cause or contribute: Apex engages them directly and directs their work	Priority. Largest group of workers who are not employees, and a direct relationship, so Apex has the greatest ability to prevent harm

Area	How modern slavery could occur	Apex relationship	Priority and reason
Subcontractors and plant hire	Debt bondage or deceptive recruiting by subcontractors, and further subcontracting on project sites. Poor pay and excessive hours are indicators that can escalate	Directly linked; may contribute through tight cost and delivery targets	Priority. Apex does not control these workplaces, and construction programmes put pressure on cost and time
Steel and timber	Forced labour or other exploitation in manufacture or in raw-material production, possibly outside Australia and New Zealand	Directly linked	Priority for 2027. Supply chains are long, and Apex has no origin data beyond direct suppliers, so severity cannot yet be assessed
Concrete, aggregates, asphalt and diesel	Labour conditions in quarrying, haulage and fuel supply	Directly linked	Monitor. Apex has not yet mapped where these inputs originate, and some, such as diesel, may come from outside Australia and New Zealand. The risk is not assumed to be absent
Waste contractors	Labour conditions in collection and sorting	Directly linked	Monitor. Contractors are licensed and reviewed annually against contract terms and environmental legislation. That review does not test labour conditions
Apex employees (420)	Unlawful deductions or underpayment that could escalate to debt bondage	May cause	Monitor. Employment in Australia and New Zealand is covered by local employment law, so Apex considers the risk lower, not nil

3.3 Apex NZ

Apex NZ has similar activities, workforce arrangements and supply categories to Apex, at a smaller scale: 126 employees in the North Island of New Zealand. It engages its own labour-hire agencies and subcontractors for North Island work. The risks in section 3.2 apply to Apex NZ, and its labour-hire relationships carry the highest priority there too.

3.4 Limits on visibility

Apex has contracts with its first-tier suppliers only. It does not systematically record where steel and timber products originate beyond the direct supplier, and it does not know whether labour-hire agencies use sub-agents or overseas recruiters. This section describes where risks may be present. It does not report an actual case of modern slavery.

4. Actions to assess and address risks (criterion (d))

This section covers actions taken during the reporting period, 1 January 2026 to 31 December 2026. Actions planned for 2027 are in section 7. The actions below apply to Apex and Apex NZ.

4.1 Governance and accountability

The CSO is responsible for Apex's response to modern slavery and reports on it quarterly to the Sustainability and Risk Committee. Internal Audit and Compliance is responsible for tracking actions and for investigating reports. In the third quarter of 2026 the Committee adopted the Apex Modern Slavery Policy.

4.2 Due diligence

Apex's due diligence is an ongoing process with four parts: identify and assess, integrate and act, track, and communicate. Apex focused its first year on the highest-priority risk, labour-hire, and on the controls it could add to systems it already had.

Part	What Apex did in 2026	Risk addressed
Identify and assess	Completed the scoping exercise described in section 3. Added modern slavery screening questions to the occupational health and safety prequalification that Apex already uses for suppliers and subcontractors	Suppliers and subcontractors at the point of engagement
Integrate and act	Adopted the Apex Modern Slavery Policy. Issued a Supplier Code of Conduct to labour-hire agencies and to principal subcontractors. Included clauses in labour-hire agency contracts: no recruitment fees charged to workers, compliance with employment law, a right to review payroll records and a right to terminate	Labour-hire; subcontractors
Integrate and act	Added a modern slavery module to the site induction that every field contractor completes before access, covering workers' rights and the reporting line	Field contractors
Integrate and act	Delivered awareness briefings for procurement, human resources and site managers, covering the indicators of modern slavery and how to report a concern	All areas
Track	Reviewed a sample of labour-hire agency payroll records, covering agencies serving both Victorian and New Zealand sites. The CSO reported progress to the Committee in the third and fourth quarters	Labour-hire
Communicate	Communicated the policy and the Supplier Code of Conduct to employees, labour-hire agencies and principal subcontractors	All areas

4.3 Remediation

In 2026 Apex opened a confidential reporting line for employees, contractors and labour-hire workers on Apex sites, in Australia and New Zealand, with an option to report anonymously. Reports go to Internal Audit and Compliance, which investigates and reports serious matters to the Committee. The line is promoted at site induction and in daily toolbox talks. These are delivered in English, and Apex has not yet measured use of the line by labour-hire workers or reviewed access for workers with limited English.

Apex's remediation approach depends on its relationship to the harm. If Apex causes or contributes to harm, it provides or cooperates in a remedy, for example by repaying unlawful deductions or fees and correcting conditions. If Apex is directly linked to harm through a supplier, it uses its leverage to stop the harm and prevent it happening again, and ends the relationship only if that fails. No report of modern slavery was received, and none was identified, during 2026.

Apex has a case-response procedure for a suspected case. It puts the interests of the suspected victim first, avoids removing workers from a situation without appropriate support, checks the facts without alerting the suspected offenders, and refers suspected cases to the Australian Federal Police.

4.4 Priorities and leverage

Apex contracts directly with labour-hire agencies and sets their terms, so it has strong leverage over them, which is why 2026 focused there. It also contracts directly with plant hire companies and principal subcontractors, but its 2026 action for those groups was limited to the Supplier Code of Conduct and the prequalification questions. Its leverage over upstream manufacturers of steel and timber is limited, and the first step is to learn where products come from. 2026 was the first year of this work, and Apex's response is at an early stage.

5. Assessing effectiveness (criterion (e))

Apex does not claim that its actions are effective. This section describes how it checks whether they are working, both whether it is identifying its risks properly and whether its actions make a difference.

What Apex checks	How	Who and when
Whether risks are identified correctly	Reviews the scoping exercise and updates it when a new site, market or supply category is added	CSO, at least annually
Whether supplier screening works	Tests a sample of prequalification files to see whether the modern slavery questions were applied consistently	Internal Audit and Compliance, annually
Whether labour-hire controls work	Reviews the results of payroll sampling and how many labour-hire agency contracts contain the modern slavery clauses	Internal Audit and Compliance, with the CSO, each quarter
Whether people are aware	Records training delivered and checks understanding with short knowledge checks	CSO, after each briefing
Whether the reporting line works	Tracks reports received, how they were handled and how long they took to resolve, and looks for trends	Internal Audit and Compliance, each quarter
Whether the overall response is working	Reviews all actions and results, and reviews this statement before Board approval	Sustainability and Risk Committee, annually

Apex tracks four measures: briefings delivered, the share of labour-hire agency contracts with the modern slavery clauses, reports resolved, and supplier engagement actions completed. 2026 is the first year in which Apex has collected these measures. It will report their values and set targets in its 2027 statement. The CSO and Internal Audit and Compliance apply these checks to Apex NZ as well, including the file and payroll sampling. No independent review of Apex's actions has been carried out.

6. Consultation (criterion (f))

Apex owns and controls one entity, Apex NZ. The level of consultation reflects that Apex NZ has 126 employees and operating sites, so it was more than notification. Apex consulted Apex NZ as follows:

- **Workshops.** The CSO's team ran workshops in Auckland in late 2026 with Apex NZ site managers and procurement staff on the risks in section 3 and the actions in section 4.
- **Review.** The directors of Apex NZ reviewed the draft statement in early 2027.
- **Common controls.** Apex NZ applies the Apex Modern Slavery Policy, the Supplier Code of Conduct and the confidential reporting line.

This is a single-entity statement, so there is no consultation with an entity giving a joint statement.

7. Other relevant information (criterion (g))

Apex's approach is continuous improvement. The following actions are planned for 2027. They are not completed, and are not counted as 2026 actions.

- **Visibility.** By the end of the second quarter of 2027, ask direct suppliers of steel and timber for the country of origin of their products, and by the end of 2027 map the second tier of those supply chains.
- **Targets.** By the end of the second quarter of 2027, set targets for the four measures in section 5.
- **Reach.** By the end of the third quarter of 2027, extend training to the supervisors of labour-hire workers, extend modern slavery clauses beyond agencies to standard subcontract templates, and review whether the reporting line and training are accessible to workers with limited English.
- **Incentives.** In the first half of 2027, review Apex's internal performance measures to check that none rewards the lowest cost or fastest delivery at the expense of workers.
- **Collaboration and review.** During 2027, raise modern slavery through the industry association of which Apex is a member, and consider an independent review of the effectiveness of Apex's actions.

8. Approval and signature

This statement was approved by the Board of Directors of Apex Australasian Infrastructure & Renewable Energy Pty Ltd, the principal governing body of the reporting entity, on 15 March 2027. It was approved as a standalone document.

Signed by a responsible member of the reporting entity:

/s/ Helen Marsden

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Helen Marsden

Chair of the Board and Director

Apex Australasian Infrastructure & Renewable Energy Pty Ltd

Date: 15 March 2027