



Excellence in Pre-Fabricated Solutions
for Mission Critical Facilities.

Modern Slavery Policy.

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1. Purpose

Parratech Group Pty Ltd (ABN 91 634 192 920) (**Parratech, we, us or our**) is committed to operating in a socially responsible and ethical manner and to identifying, assessing, preventing and mitigating the risk of modern slavery in our operations and supply chains.

This Policy sets out Parratech's approach to modern slavery, the responsibilities of our people in identifying and reporting modern slavery risk, and the standards we require of our suppliers. This Policy applies in addition to, and does not replace, Parratech's separate annual Modern Slavery Statement, which is prepared to meet Parratech's reporting obligations under the Modern Slavery Act 2018 (Cth) (the **Act**).

2. Scope

This Policy applies to all directors, officers, employees and contractors of Parratech, and to all suppliers, subcontractors and other business partners engaged in Parratech's operations and supply chains. It applies across all locations in which Parratech operates, including Sydney (head office), Brisbane, Melbourne, Perth and Canberra.

3. Definitions

Modern slavery includes trafficking in persons, slavery, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services, as those terms are used in the Act.

Supply chain means the sequence of processes involved in the procurement, production and distribution of goods and services supplied to Parratech, including by first-tier and indirect (sub-tier) suppliers.

Supplier Code of Conduct means Parratech's code setting out the standards of conduct, including on human rights and modern slavery, that Parratech requires of its suppliers.

4. Policy Statement

Parratech has zero tolerance for modern slavery in any part of its operations or supply chains. We aim to meet standards of integrity that go beyond our legislative requirements, and we expect the same commitment from every supplier, contractor and business partner we engage.

5. Our Operations and Supply Chain

Parratech is headquartered in Sydney and conducts business across Australia, primarily in Brisbane, Melbourne, Sydney, Perth and Canberra.

The goods and services Parratech sources relate primarily to the development and construction of pre-fabricated acoustic enclosure and fuel systems for data centres. Our major categories of spend include structural steel, electrical components, building materials, stainless steel, skilled labour, and professional services.

While the majority of Parratech's first-tier suppliers are based in Australia, our supply chains are complex and often involve indirect inputs. Countries most relevant to indirect sourcing include Australia, New Zealand, Italy, China, India, Turkey, Malaysia and South Korea. We recognise that modern slavery risk is more prevalent in certain of these jurisdictions and that risk in our indirect (sub-tier) supply chain requires ongoing attention alongside our direct supplier relationships.

6. Identifying and Assessing Risk

Parratech's largest human rights risks are associated with the supply of goods used in the construction of our products. We also recognise that our own workforce structure carries risk: casual employees and contractors make up a substantial majority of Parratech's workforce relative to permanent headcount, and labour hire and contracting arrangements in the construction industry are recognised risk indicators for underpayment, unsafe conditions and, in the most severe cases, forced labour and debt bondage. Parratech treats this as a distinct risk category within its own operations, in addition to supplier and sub-tier supply chain risk. We prioritise our highest-risk direct suppliers for due diligence, and consider factors including geography, industry sector and operational circumstances when assessing risk. We seek to increase visibility of the origin of goods and services before they are delivered to Parratech, recognising that indirect supply chain tiers also carry vulnerability.

7. Due Diligence and Supplier Requirements

All suppliers are required to comply with Parratech's Supplier Code of Conduct, including its Human Rights Policy and modern slavery requirements.

Parratech's Procurement function conducts supplier due diligence at various stages of sourcing and procurement, focused on identifying, assessing, preventing and mitigating human rights risks, with priority given to our highest-risk direct suppliers.

New suppliers are subject to a vetting process that includes human rights risk assessment as a key criterion of vendor approval. Prospective suppliers may be required to provide information demonstrating how modern slavery risks are managed within their organisation, and must acknowledge the Supplier Code of Conduct, including its prohibition on child, bonded, forced or involuntary labour. A prospective supplier that cannot demonstrate compliance with these requirements will not be permitted to trade with Parratech.

Where appropriate, and in connection with site visits conducted for procurement or quality purposes, Parratech will incorporate a modern slavery assessment into its supplier site visits.

8. Training and Awareness

Parratech provides training and awareness sessions to build staff knowledge of modern slavery risks, including how to identify indicators of modern slavery and how to report suspected incidents. Training is mandatory for Parratech employees involved in the management of procurement. The Procurement, Risk and Compliance functions are responsible for evaluating the content and effectiveness of this training on an ongoing basis, and for reporting on training completion and outcomes as part of the annual review of this Policy.

9. Reporting and Remediation

Employees, contractors and third parties may raise grievances, including actual or suspected breaches of this Policy, through Parratech's whistleblowing and grievance channels (including under Parratech's Whistleblower Policy, which provides statutory protections for eligible whistleblowers under the Corporations Act 2001 (Cth)), or by speaking with a member of the modern slavery committee, their manager, or another management representative. Concerns may be raised confidentially or anonymously, and Parratech will not tolerate victimisation or detrimental treatment of anyone who raises a concern in good faith. All concerns and grievances will be managed fairly and impartially.

Where a non-conformance or modern slavery risk is identified in relation to a supplier, Parratech will work with that supplier to agree and implement a corrective action plan within an agreed timeframe.

10. Roles and Responsibilities

Board / Managing Director: approves this Policy and Parratech's annual Modern Slavery Statement and holds overarching responsibility for risk management in this area.

Human Resources: oversees implementation of this Policy, monitors emerging risk, and acts as a confidential point of contact for staff raising concerns.

Procurement, Risk and Compliance functions: conduct supplier due diligence, deliver and evaluate training, and monitor supplier compliance with the Supplier Code of Conduct.

All employees and contractors: complete required training, comply with this Policy, and report suspected modern slavery risks or breaches promptly through the channels described in section 9.

11. Consultation

This Policy has been prepared in consultation with Parratech's procurement, operations, legal, risk and compliance functions.

12. Continuous Improvement

Parratech's modern slavery framework is an ongoing program of work. We intend to continue maturing our processes as the business grows, to remain aligned with domestic and global standards, and to strengthen: (i) training and awareness programs, internally and externally; (ii) deep-dive supplier assessments across new suppliers; (iii) supplier audit activities, in line with contractual obligations; (iv) internal assurance programs supporting our procurement activities; and (v) supplier engagement to raise awareness and drive corrective action.

Parratech will assess the effectiveness of the actions described in this Policy annually, including by reference to training completion rates, the number and outcome of supplier risk assessments and audits, grievances received and resolved, and corrective action plans closed, and will report on this assessment in its annual Modern Slavery Statement.

13. Related Documents

This Policy should be read together with Parratech's Supplier Code of Conduct, Human Rights Policy, Whistleblowing Policy and annual Modern Slavery Statement.

14. Policy Review

This Policy will be reviewed at least annually, or earlier if there is a material change to Parratech's operations, supply chains, or legal obligations under the Act. This Policy was last reviewed by the Head of People, and General Counsel, on 25 September 2026.

Approved by

Signed by:

Jason Fooks

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Jason Fooks

Managing Director

REVISION	Date	Last reviewed
A	30th September 2026	28 th September 2026