OCU Group
Energy Transition | Utilities & Digital Infrastructure

Modern Slavery Statement

1. Reporting Entities and Approval

This Modern Slavery Statement is made pursuant to section 54[1] of the United Kingdom's Modern Slavery Act 2015 and section 16[2] of the Australian Modern Slavery Act 2018 (Cth). It sets out the steps taken during the financial year ending 30 April 2026 to assess and address the risk of modern slavery and human trafficking in the operations and supply chains of OCU Group and its relevant subsidiaries.

This is a joint Statement made on behalf of OCU Group and its reporting entities, collectively referred to herein as the "Reporting Entities" and set out in Appendix 1. Unless stated otherwise, references in this statement to "OCU", "OCU Group", "we", "our" and "us" refer collectively to the reporting entities.

This Statement applies to the mandatory reporting entities identified in Appendix 1. Entities within OCU Group that do not independently meet reporting thresholds are included within scope on a voluntary basis. It also covers entities owned or controlled by the reporting entities, including those operating in New Zealand and India, reflecting the Group's commitment to maintaining a consistent and risk-based approach to modern slavery risk management across its global operations.

This statement was approved by the Board of OCU Group on 24th June 2026, and signed by Michael Hughes, Group Chief Executive Officer for and on behalf of the reporting entities.

2. Introduction from the Group Chief Executive Officer

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

During the reporting period, OCU has expanded internationally into Australia, New Zealand and India, increasing the scale of our operations and the breadth of our supply chains, reinforcing the need for consistent standards across our global operations and supply chains.

Our approach to business is captured in our Code of Conduct which sets out the principles through which we seek to create a sustainable business for all our stakeholders, including our shareholders, clients, employees, suppliers and contractors, business partners, local communities and members of the public. We believe that sustainable growth is only possible

[1] Clause 54(1)-(3), Part 6 of the United Kingdom's Modern Slavery Act 2015 defines a "commercial organisation" required to prepare a Modern Slavery Act statement.
[2] Section 5, Part 1 of the Australian Modern Slavery Act 2018 defines a "reporting entity" required to prepare a Modern Slavery Act statement.

in an environment which treats all stakeholders with respect and integrity and is fair, transparent and honest.

A key part of this is ensuring that we do not engage directly or indirectly in slavery or human trafficking, and this is a key priority for our executive management and our Board of Directors. This year we launched a new Supply Chain Code of Conduct, employee training module and have enhanced our due diligence processes to continue to strengthen our arrangements.

We are committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the UK Modern Slavery Act 2015 and Australian Modern Slavery Act 2018 (Cth).

We expect the same high standards from all of our contractors, suppliers and other business partners, and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

3. Our Business, Operations & Supply Chain

OCU Group is an international infrastructure and utilities services business providing design, build, installation and maintenance services across the energy transition, regulated power, digital infrastructure, water and wastewater, design and civil engineering markets.

The Group is headquartered in the United Kingdom and has operations in Australia, New Zealand and India, with delivery led through a network of offices, operational premises and project sites.

In FY25-26, OCU significantly expanded its international delivery capability in Australia and New Zealand through three strategic acquisitions: All Energy Contracting, Pilecom and Bam Bam.

All Energy Contracting (AEC) is a specialist in renewable energy and power infrastructure. Pilecom is a specialist provider of mechanical installation for energy infrastructure. Bam Bam specialises in ground engineering services for the energy market.

Together these businesses deliver renewable energy and infrastructure services across solar, wind, battery storage, geotechnical, and precision installation solutions, providing support to clients across the full project lifecycle.

Our UK operations include a range of activities across infrastructure and non-infrastructure environments, both above and below ground. These activities include engineering and design services, project delivery, mechanical and civil engineering, renewable energy infrastructure construction, regulated utility and digital infrastructure works and associated maintenance services.

Our supply chains support these activities and include the procurement of materials, plant, equipment, labour, subcontract services, logistics and professional services. We source from a large number of suppliers, the majority of which are based in the country of operations and

[1]Clause 54(1)-(3), Part 6 of the United Kingdom's Modern Slavery Act 2015 defines a "commercial organisation" required to prepare a Modern Slavery Act statement.
[2]Section 5, Part 1 of the Australian Modern Slavery Act 2018 defines a "reporting entity" required to prepare a Modern Slavery Act statement.

are often geographically aligned to project locations. Our supply chain includes suppliers and service providers operating internationally and we also utilise client free-issue materials in some parts of the business.

Given the nature of our business, our supply chains can involve multiple tiers of suppliers and service providers. We recognise that modern slavery risks are less visible beyond our direct suppliers, particularly where goods or labour inputs are sourced from higher-risk sectors or jurisdictions.

4. Our Approach & Governance

OCU is committed to conducting business in a lawful, ethical and transparent manner. Our approach to preventing and addressing modern slavery is supported by Group wide and local governance arrangements, policies, labour controls, procurement processes and reporting channels, supported and led by local practice.

Responsibility for oversight sits with senior leadership and the Board, supported by relevant Group and regional support functions including Legal & Compliance, Procurement, Commercial, Human Resources, Finance and Operational management teams. Further, in Australia, a modern slavery steering committee has been formed, which reports into the wider Group.

4.1 Policies Against Modern Slavery and Human Trafficking

Our approach is informed by our Code of Conduct and related policies, including our Modern Slavery and Human Trafficking Policy, Business Partner Policy, Supplier Code of Conduct, and Speak Up arrangements. Related policies cover Anti-bribery and Corruption, Sustainability and Responsible Business Conduct.

We are committed to the principles enshrined in the International Labour Organisation Conventions and the United Nations Convention on the Rights of the Child and expect our suppliers and subcontractors to operate to standards consistent with our own. Our contracts and supplier controls are designed to reinforce this expectation and provide mechanisms for escalation where concerns are identified.

These policies communicate our expectations in relation to ethical conduct, labour standards, reporting of concerns and compliance with applicable law and are intended to support lawful and ethical conduct, communicate expectations to employees and third parties, and provide mechanisms for raising and addressing concerns.

5. Modern Slavery Risks in Our Operations & Supply Chain

For the purposes of this Statement, the risk of modern slavery means the potential for the Group to cause, contribute to, or be directly linked to slavery, servitude, forced labour, child labour or human trafficking through its operations or supply chains.

[1]Clause 54(1)-(3), Part 6 of the United Kingdom's Modern Slavery Act 2015 defines a "commercial organisation" required to prepare a Modern Slavery Act statement.
[2]Section 5, Part 1 of the Australian Modern Slavery Act 2018 defines a "reporting entity" required to prepare a Modern Slavery Act statement.

OCU Group
Energy Transition | Utilities & Digital Infrastructure

We consider the inherent risk within our direct operations to be lower relative to certain parts of our supply chain, due to our employment controls, recruitment practices, oversight of labour arrangements and the transparency of our internal systems, although we do not consider risk to be absent from our operations.

We recognise that risks may still arise in our own operations, particularly where contingent labour, temporary workers, labour providers, subcontracted labour or vulnerable worker populations are involved.

The principal areas in which modern slavery risk may arise for OCU within the reporting entities are:

Contingent labour and service providers, including the use of temporary workers and subcontractors, where risks may arise from deceptive recruitment practices, worker vulnerability, unlawful deductions, debt bondage or inadequate oversight.

Construction and project delivery activities, where high labour demand, subcontracting models and site based delivery can increase exposure to labour exploitation risks, particularly where migrant workers are involved.

Procurement of goods and materials, particularly where supply chains are complex, global or involve categories that may present elevated risk, such as certain manufactured goods, steel products, electrical components, solar-related products or other goods sourced through higher-risk sectors or jurisdictions.

Partnering and subcontracting arrangements, where OCU may not exercise the same degree of direct control as it does when self-performing work.

Lower-skilled, vulnerable or economically exposed workers, who may be at greater risk of exploitation due to language barriers, dependency on intermediaries, limited awareness of rights or wider economic pressures.

We also recognise that modern slavery risk can be influenced by geography, commodity type, labour model and the maturity of a supplier’s own governance arrangements.

6. Actions Taken to Assess & Address Modern Slavery Risks

The Group applies a risk based due diligence framework to modern slavery risks across its operations and supply chains. This framework includes: (i) identifying risk, (ii) assessing risk, (iii) implementing controls and mitigation measures, (iv) monitoring effectiveness, and (v) escalating and remediating issues where necessary.

6.1 Risk Identification & Assessment

We assess modern slavery risk through a combination of internal and external information sources, including the nature of goods and services procured, the use of subcontract or labour only models, country and sector risk indicators, supplier history and performance, and operational knowledge from procurement, commercial and operational project teams.

[1]Clause 54(1)-(3), Part 6 of the United Kingdom’s Modern Slavery Act 2015 defines a “commercial organisation” required to prepare a Modern Slavery Act statement.
[2]Section 5, Part 1 of the Australian Modern Slavery Act 2018 defines a “reporting entity” required to prepare a Modern Slavery Act statement.

OCU has also developed a risk-based approach to supply chain profiling, including supplier risk dashboards and heatmapping processes to help prioritise oversight. Our approach considers that risk may be higher where goods or services are sourced from sectors or jurisdictions associated with weaker labour protections or where supply chains are more complex and less transparent.

6.2 Supplier Onboarding and Due Diligence

As part of onboarding new suppliers and reviewing existing suppliers, the Group undertakes due diligence intended to identify and mitigate modern slavery risk. This includes risk assessment of new suppliers, periodic review of supplier arrangements, checks on labour related controls where relevant, and the use of subcontractor diligence processes. Supplier diligence is ongoing and may be revisited where there is a change in scope, contract, geography or working arrangements.

We also seek to assess whether suppliers and subcontractors have appropriate controls of their own, including compliance with applicable laws, ethical labour practices and appropriate escalation channels. Where relevant, we request or review suppliers' own modern slavery statements and supporting information.

6.3 Contractual Controls and Supplier Expectations

The Group communicates its expectations to suppliers and subcontractors through its policies, contractual arrangements and supplier standards. Our standard terms and conditions include provisions requiring suppliers and subcontractors to comply with applicable laws and to ensure that modern slavery or human trafficking is not present in their business or supply chains. We reserve the right to take action, including corrective action or termination of the relationship, where serious breaches are identified.

Our Supplier Code of Conduct and broader supply chain policies set expectations in areas such as:

- compliance with minimum age requirements and applicable wage laws;
- prohibition on charging recruitment fees to workers or using misleading recruitment practices;
- protection of workers' identity and immigration documents;
- provision of channels for workers to raise concerns confidentially and without retaliation; and
- cascading equivalent expectations through suppliers' own supply chains.

6.4 Workforce & Labour Controls

The Group maintains employment and labour controls designed to reduce the risk of exploitation within its workforce and labour supply arrangements. These include right-to-work

[1]Clause 54(1)-(3), Part 6 of the United Kingdom's Modern Slavery Act 2015 defines a "commercial organisation" required to prepare a Modern Slavery Act statement.
[2]Section 5, Part 1 of the Australian Modern Slavery Act 2018 defines a "reporting entity" required to prepare a Modern Slavery Act statement.

checks, identity verification processes and tools, employment reference checks, payroll controls and checks on payment arrangements.

We recognise that labour supply chains can present elevated risk, particularly where third-party labour providers are used. Accordingly, we seek to ensure that personnel provided through third parties are engaged lawfully and transparently, and that payment and recruitment arrangements are subject to appropriate scrutiny.

Across the Group, additional local or business specific controls may also apply, including subcontractor checklists, site-based monitoring, worker communications, induction materials and practical awareness measures intended to support early identification of red flags.

6.5 Monitoring, Audit & Corrective Action

The Group uses a range of monitoring activities to support its approach, including supplier reviews, project and site oversight, payroll auditing, subcontractor diligence, internal oversight and third-party audit activity where relevant.

During the reporting period, the Group also undertook an independent ethical employment and modern slavery audit across parts of its UK operations and separately audited employment practices in relation to a primary service provider.

Where concerns or weaknesses are identified, OCU would work with suppliers to implement a corrective action plan within an agreed timeframe. Where a supplier fails to improve or where a serious breach is identified, sanctions may be applied up to and including termination of the relationship.

6.6. Speak Up Arrangements & Remediation

OCU maintains confidential reporting mechanisms through its Speak Up / EthicsPoint arrangements, which are available to employees and, where applicable, third parties who wish to raise concerns. Reports may be made confidentially and, where permitted by law, anonymously. OCU does not tolerate retaliation against anyone who raises a genuine concern in good faith. Concerns are assessed and addressed by the appropriate internal teams, including Legal & Compliance.

During the reporting period, the Group did not identify any confirmed instances of modern slavery or human trafficking within its operations or supply chains requiring remediation. However, we recognise the importance of maintaining mechanisms capable of identifying, escalating and addressing concerns in the event that they arise.

Where modern slavery risks or incidents are identified, the Group is committed to taking appropriate remedial action, including working with suppliers to address issues, supporting affected individuals where possible, and, where necessary, terminating relationships.

[1]Clause 54(1)-(3), Part 6 of the United Kingdom's Modern Slavery Act 2015 defines a "commercial organisation" required to prepare a Modern Slavery Act statement.
[2]Section 5, Part 1 of the Australian Modern Slavery Act 2018 defines a "reporting entity" required to prepare a Modern Slavery Act statement.

6.7. Merger & Acquisition Due Diligence

OCU undertakes risk-based due diligence in relation to all acquisitions as part of its broader approach to managing modern slavery risk. This includes assessing the acquired entity's operations, governance framework, workforce arrangements and supply chain to identify potential exposure to modern slavery risks.

As part of this process, we undertake site visits, review policies, labour practices, supplier relationships and existing controls, and, where appropriate, conduct enhanced due diligence on higher-risk areas such as labour supply chains, subcontracting arrangements and sourcing from higher-risk jurisdictions.

Following acquisition, we seek to integrate entities into the Group's governance framework, including aligning them to OCU's policies, due diligence processes and supplier standards, and addressing any identified gaps through remediation and continuous improvement actions.

7. Training and Awareness

Modern slavery awareness training is provided during onboarding and as part of our general compliance arrangements. For office-based employees and site operatives, induction processes include awareness of modern slavery risks and reminders of how to raise concerns with local leadership or through the Group's independent reporting channels.

Within operational environments, awareness is also reinforced through toolbox talks, project or site inductions, safety stand-downs, subcontractor communications and, where appropriate, posters and multilingual awareness materials. These practical measures support visibility of expectations and escalation routes at site level.

Training is designed to help employees understand the warning signs of modern slavery and human trafficking, recognise red flags in labour and supply chain arrangements, and know how to escalate concerns appropriately. Participation in compliance and ethics training is monitored through Group processes and overseen by the Audit & Risk Committee.

8. Assessing the Effectiveness of Our Actions

The Group assesses the effectiveness of its actions to address modern slavery risk through a combination of qualitative and quantitative indicators. These include review of due diligence activity, supplier risk assessments, audit findings, training completion, workforce verification controls, contractual compliance, use of reporting channels and the status of any corrective action plans.

During the reporting period, these measures were used to monitor supplier compliance, workforce assurance and escalation activity across the Group:

- the proportion of relevant suppliers subject to modern slavery risk assessment or review;
- the number and outcome of supplier or labour-related audits undertaken;
- the level of completion of modern slavery and broader compliance training;

[1]Clause 54(1)-(3), Part 6 of the United Kingdom's Modern Slavery Act 2015 defines a "commercial organisation" required to prepare a Modern Slavery Act statement.
[2]Section 5, Part 1 of the Australian Modern Slavery Act 2018 defines a "reporting entity" required to prepare a Modern Slavery Act statement.

- the number of concerns raised through Speak Up or other channels and the effectiveness of follow-up actions;
- the implementation and closure of corrective action plans where issues are identified; and
- the extent to which key suppliers and subcontractors meet OCU's contractual and policy expectations.

OCU recognises that assessing effectiveness in this area requires continuous development. We will continue to refine our measures over time to improve visibility, consistency and comparability across the Group.

9. Consultation with Group Reporting Entities

This Statement has been prepared by the Group's Risk & Compliance team, in consultation with relevant reporting entities across OCU Group, including Group functions and business leadership involved in operations, procurement, people management, legal and compliance, finance and project delivery. Consultation was undertaken to support a common understanding of modern slavery risk across the Group and to inform the content of this Statement.

In particular, consultation included engagement with relevant teams and leaders across the Group's operations in the United Kingdom and Australia, together with review of applicable policies, processes, controls and operating practices. Group level policies and minimum expectations are defined centrally, while implementation reflects local operations, legal requirements and risk exposure. In Australia and New Zealand, the entities owned by the Australian reporting entity have common directorship and management.

Where this Statement is made on behalf of entities owned or controlled by a reporting entity, the consultation process was intended to ensure those entities were considered in the identification of risks and the description of actions taken to assess and address those risks.

The Directors of the Group's reporting entities listed in Appendix 1 were consulted during the preparation of this statement. They were also provided with an advance copy of the statement and an opportunity to provide comments and input before the statement was finalised for approval by OCU Group's Board of Directors.

10. Continuous Improvement and Future Priorities

The Group recognises that modern slavery risk management is an ongoing process and that expectations continue to evolve. During the next reporting period, we intend to continue strengthening our approach in the following areas:

- further enhancing supplier risk segmentation and supply chain mapping, including continued focus on higher-risk categories, jurisdictions and labour models;
- increasing the consistency and depth of supplier and labour-provider due diligence across the Group;

[1]Clause 54(1)-(3), Part 6 of the United Kingdom's Modern Slavery Act 2015 defines a "commercial organisation" required to prepare a Modern Slavery Act statement.
[2]Section 5, Part 1 of the Australian Modern Slavery Act 2018 defines a "reporting entity" required to prepare a Modern Slavery Act statement.

- continuing to strengthen workforce awareness through training, induction, toolbox talks and practical site-level communications;
- improving the use of measurable effectiveness indicators, including audit outcomes, supplier review coverage and training completion data;
- maintaining robust Speak Up and escalation mechanisms and reinforcing confidence in non-retaliation protections; and
- continuing to review and refine contractual controls, supplier standards and remediation pathways where concerns are identified.

OCU Group remains committed to continuous improvement in the prevention, identification and mitigation of modern slavery risks across its operations and supply chains.

11. Approval

This statement was approved by the Board of OCU Group Limited, in its capacity as principal governing body, on 24th June 2026, and signed by Michael Hughes, Group Chief Executive Officer and Statutory Director for an on behalf of the reporting entities.

Michael Hughes
Chief Executive Officer
OCU Group Limited

Date: 24 June 2026

[1]Clause 54(1)-(3), Part 6 of the United Kingdom's Modern Slavery Act 2015 defines a "commercial organisation" required to prepare a Modern Slavery Act statement.
[2]Section 5, Part 1 of the Australian Modern Slavery Act 2018 defines a "reporting entity" required to prepare a Modern Slavery Act statement.

Appendix 1 – Reporting Entities

Australian Modern Slavery Act 2018 (Cth)

The "Reporting Entities"[2] for this Statement under the Australian Modern Slavery Act 2018 are:

Entity Name	Company Number
OCU AEC PTY Limited	ACN 688 943 580
All Energy Contracting Pty Limited	ACN 623 989 453
Pilecom Pty Ltd	ACN 151 467 506
Bam Bam Pile Driving PTY Ltd	ACN 650 926 131

United Kingdom Modern Slavery Act 2015

The reporting "Commercial Organisations"[1] which meet the criteria for this Statement under the United Kingdom Modern Slavery Act 2015 are:

Entity Name	Company Number
OCU Group	09307607
Integrum Power Engineering Limited	10956687
OCU (Plant) Limited	09388526
OCU Services Limited	03421543
OCU Utility Services Limited	02916906
Peter McCormack & Sons Limited	NI038813
OCU Opals Limited	08152431
R J McLeod (Contractors) Limited	SC028565

[1]Clause 54(1)-(3), Part 6 of the United Kingdom's Modern Slavery Act 2015 defines a "commercial organisation" required to prepare a Modern Slavery Act statement.
[2]Section 5, Part 1 of the Australian Modern Slavery Act 2018 defines a "reporting entity" required to prepare a Modern Slavery Act statement.

Appendix 2 - Content Cross-Referenced to MSA Reporting Criteria

U.K. Modern Slavery Act 2015, Section 54(5)'s Recommended Reporting Criteria	Australia Modern Slavery Act 2018 (Cthst), Section 16(1)'s Mandatory Reporting Criteria	Sections Addressing Criteria
• The organization's structure, its businesses, and its supply chains	• Identify the reporting entity • Describe the structure, operations, and supply chains of the reporting entity	Section 1 – The Reporting Entities and Approval Appendix 1 – Reporting Entities. Section 3 – Our Business, Operations & Supply Chain
	• Describe the process of consultation with (i) any entities that the reporting entity owns or controls and, (ii) for joint modern slavery statements, the entity giving the statement	Section 9 – Consultation with Group Reporting Entities
• Its policies in relation to slavery and human trafficking		Section 4 – Our Approach & Governance Section 4.1 - Policies Against Human Trafficking and Slavery
• Its due diligence processes in relation to slavery and human trafficking in its businesses and supply chains	• Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Section 6 – Actions Taken to Assess & Address Modern Slavery Risks (6.1 – 6.6)
• The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk	• Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence	Section 5 – Modern Slavery Risks in our Supply Chain & Operations Section 6 – Actions Taken to Assess & Address Modern Slavery Risks (6.1 – 6.6)

[1]Clause 54(1)-(3), Part 6 of the United Kingdom's Modern Slavery Act 2015 defines a "commercial organisation" required to prepare a Modern Slavery Act statement.
[2]Section 5, Part 1 of the Australian Modern Slavery Act 2018 defines a "reporting entity" required to prepare a Modern Slavery Act statement.

U.K. Modern Slavery Act 2015, Section 54(5)'s Recommended Reporting Criteria	Australia Modern Slavery Act 2018 (Cthst), Section 16(1)'s Mandatory Reporting Criteria	Sections Addressing Criteria
	and remediation processes	
• Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	• Describe how the reporting entity assesses the effectiveness of such actions.	Section 8 – Assessing the Effectiveness of Our Actions
• The training about slavery and human trafficking available to its staff		Section 7 - Training & Awareness
	• Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Section 2- Introduction from the Group CEO Section 10 – Continuous Improvement & Future Priorities
• Statement must be approved by the principal governing body and signed by a responsible member		Section 1 – Reporting Entities and Approval Section 11 – Approval

[1]Clause 54(1)-(3), Part 6 of the United Kingdom's Modern Slavery Act 2015 defines a "commercial organisation" required to prepare a Modern Slavery Act statement.
[2]Section 5, Part 1 of the Australian Modern Slavery Act 2018 defines a "reporting entity" required to prepare a Modern Slavery Act statement.