



Modern Slavery Statement

FY 26

CEO. Statement

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At Hydroflux, we believe meaningful progress comes from consistent action, ongoing engagement, and a willingness to learn and improve. Addressing modern slavery requires us to continually strengthen our practices across our operations and supply chain, and we remain committed to that ongoing effort.

John Koumoukelis

Hydroflux CEO/Chair



Hydroflux remains committed to conducting its business with integrity, and to ensuring that the rights and welfare of workers are respected throughout our operations and supply chains. Modern slavery represents one of the most pressing human rights risks facing global business today, and while the risk within our direct operations remains low, we recognise that more complex risk can exist further within our supply chain, often in areas where visibility is more limited.

This commitment is reflected in Goal 9 of our 2030 Sustainability Goals, which sets out our ambition to work with our supply chain to increase transparency and respect for human rights. We recognise that managing modern slavery risk requires a clear understanding of our operations, who we work with, and how risk may present itself across our supplier base. With this in mind, we are progressing new policies and processes intended to strengthen visibility and oversight across our supply chain, helping ensure our approach to risk assessment continues to be informed by accurate information.

Hydroflux is not yet required to report under the Modern Slavery Act 2018 (Cth). We continue to publish this Statement voluntarily, reflecting our view that responsible business conduct extends beyond minimum legal requirements. We remain committed to a proportionate, risk-based approach to due diligence, and to responding to identified risks through review, engagement and follow-up.

This Statement sets out the steps taken by Hydroflux during the FY26 reporting period to identify and manage modern slavery risk and reflects our continued commitment to acting responsibly and with integrity as our approach continues to improve over time.

John Koumoukelis

Consultation & Approval

This Modern Slavery Statement (“Statement”) was voluntarily prepared in alignment with section 14 of the Modern Slavery Act 2018 (Cth) (“Act”), acting as a joint statement made on behalf of all entities in the Hydroflux group of companies. The Statement has been prepared for the 2025-26 Financial Year (1 July 2025-30 June 2026) (“Reporting Period”).

In preparing this Statement, Hydroflux Pty Ltd consulted with all entities it owns and controls through a common group director who sits on the board of each entity and maintains oversight of their respective operations. Through this process, information relevant to each entity, including its operations, supply chains, modern slavery risks and actions taken during FY26 was considered in the development of this Statement.

This consultation was supported by common group governance arrangements, under which entities operate within shared operational, procurement and reporting structures. Relevant supplier, procurement and operational information was captured and reported through these established group-level processes, providing a consistent basis for assessing modern slavery risk and informing this Statement.

This Statement has been prepared in consultation with all entities owned or controlled by Hydroflux Pty Ltd (as listed in Section 5) and approved by the Board of Hydroflux Pty Ltd, as the principal governing body of the Group, on behalf of Hydroflux Pty Ltd and its controlled entities.

JK

John Koumoukelis

Chair / Chief Executive Officer
(CEO) of Hydroflux Pty Ltd

About This Statement

This Statement has been prepared in alignment with the reporting criteria in the Modern Slavery Act 2018 (Cth) (“Act”). The table of contents below highlights where each of the criterion is addressed in the statement.

Requirements of the Act	Section	Page
Identify the reporting entity	3) Our structure, operations, and supply chains	5 - 7
Describe the reporting entity’s structure, operations and supply chains		
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	4) Risks of modern slavery in our operations and supply chains	8
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	5) Our actions to address key modern slavery risks	9 - 10
Describe how the reporting entity assesses the effectiveness of these actions	6) Our actions to assess the effectiveness of these actions	11
Describe the process of consultation with any entities that the reporting entity owns or controls	1) Consultation and approval	2
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	N/A	

Disclaimer

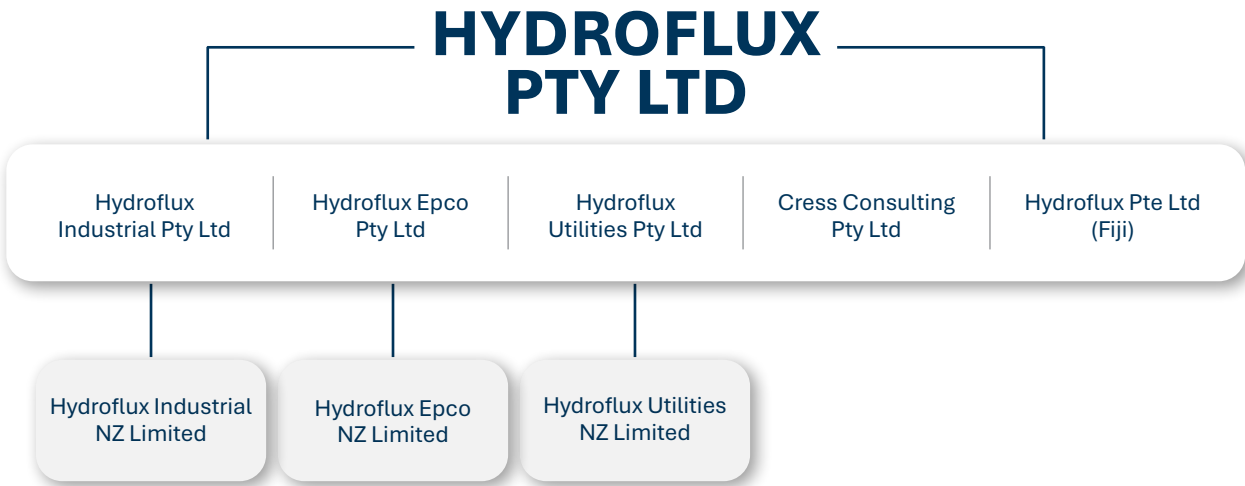


This Statement has been prepared by Hydroflux Pty Ltd for the purposes of reporting in alignment with the Act. All information contained in the report is provided in good faith, however, we make no representation or warranty of any kind, express or implied, regarding the accuracy, adequacy, validity, reliability, availability or completeness of any information.

Our Structure

Hydroflux, ABN 19 163 533 186, is a privately owned Australian company in the water industry headquartered at 44 Market St, Sydney NSW 2000. Hydroflux is the parent entity and owns and controls five subsidiary entities, each operating independently while providing complementary products and services across industrial, municipal, and sustainability consulting sectors.

With over 100 employees across the organisation, Hydroflux maintains a shared governance framework where each subsidiary retains operational autonomy but adheres to the Group’s overarching policies and ethical standards. This structure supports oversight over our people and supply chains, enabling us to maintain a consistent approach to modern slavery risk management.



Legal Entity Name	Location	ABN / Business Number
Hydroflux Industrial Pty Ltd	Australia	86 163 374 338
Hydroflux Industrial NZ Limited	New Zealand	9429046950734 (NZBN)
Hydroflux Epco Pty Ltd	Australia	93 161 226 606
Hydroflux Epco NZ Limited	New Zealand	9429046927620 (NZBN)
Hydroflux Utilities Pty Ltd	Australia	68 166 065 461
Hydroflux Utilities NZ Limited	New Zealand	9429046950727 (NZBN)
Cress Consulting Pty Ltd	Australia	98 150 137 723
Hydroflux Pte Ltd (Fiji)	Fiji & Pacific Islands	50 56620 06 (TIN)

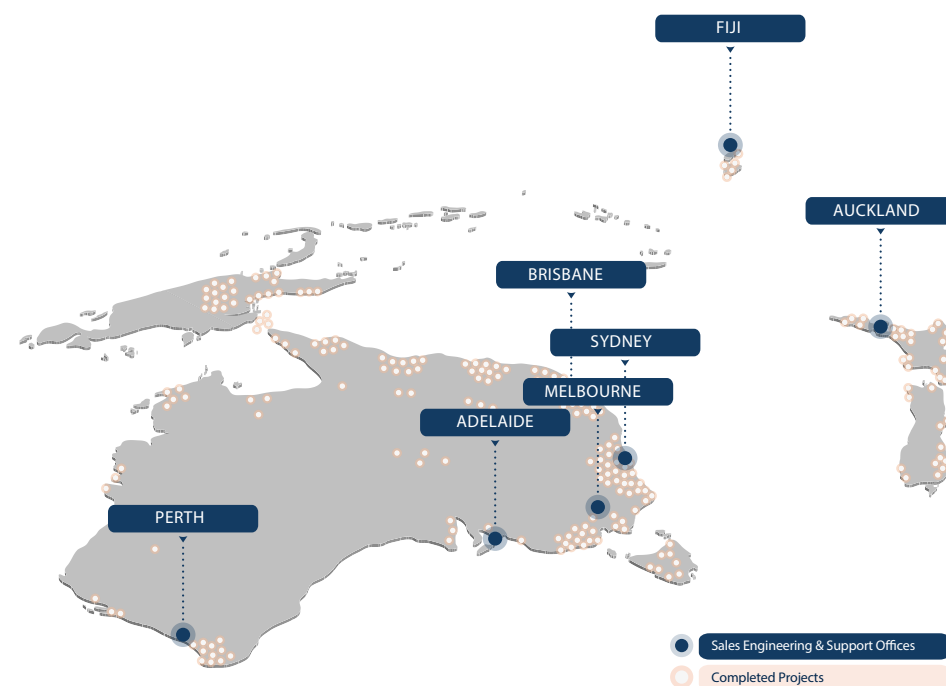
Our Operations

Hydroflux is an Australian-headquartered group of companies providing specialised products and services in water, wastewater, sludge management, and renewable energy solutions throughout the ANZ-Pacific region. Our subsidiary companies deliver projects and support to industries, municipalities, and communities through the provision of

design services, equipment supply, complete design and construction projects, service and operation contracts, high-performance chemicals, and sustainability consulting services. The nature and types of activities undertaken by each specialist entity are distinct but complementary:



Our national footprint spans seven office branches across Australia, New Zealand, and Fiji. We are supported by a skilled and diverse team of engineers, scientists, project designers, and sustainability specialists, amounting to a total of 114 employees as of 30 June 2026, allowing us to deliver projects across the region:



Supplier Arrangements

Our supplier arrangements are generally characterised by stable, long-term partnerships with leading global equipment manufacturers and a wide network of local service providers. We often act as the sole distributor of specialist equipment in the Australia-Pacific region, while also sourcing specialist chemicals and technical services to support the delivery of its water and wastewater solutions.

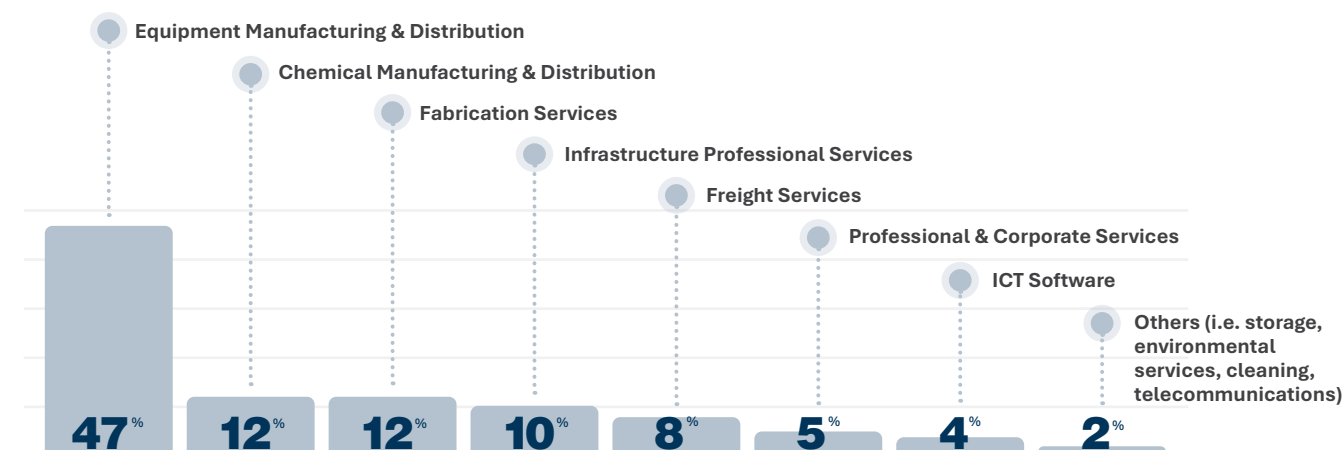
Our Supply Chains



Supply chains remained relatively unchanged, and our risk profile remained broadly consistent, with most assessed procurement categories rated low to medium risk and higher risks concentrated within a comparatively small part of the supplier base.

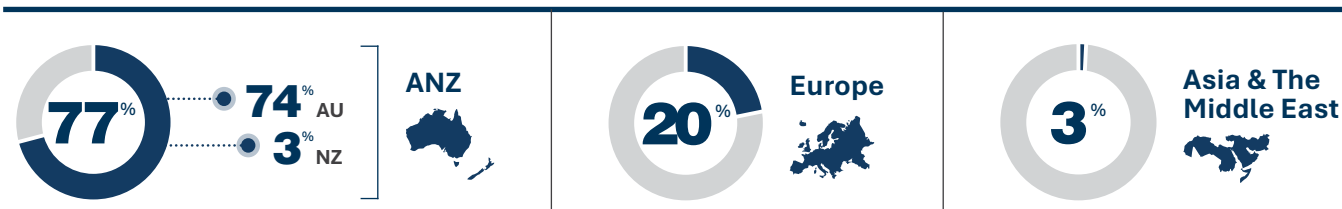
Hydroflux identified 108 priority suppliers based on top spend and invoice volume per entity, as well as sector and industry, product and services, and geographic risks. These priority suppliers accounted for 61% of total spend and 50% of total invoice volume.

» Based on our assessment of our priority suppliers, our most significant spend categories were:



While we strive to procure domestically where possible, some of our goods and services are procured from trusted overseas suppliers and partners located across the globe, including Germany, the Netherlands, Ireland, Austria, Italy, the United Kingdom, United States, United Arab Emirates, China, Türkiye, Philippines, Singapore, and Taiwan.

» Our FY26 expenditure came from the following regions:



Risks Of Modern Slavery In Our Operations & Supply Chains

Hydroflux recognises that modern slavery risks may occur in our operations and supply chains. Consistent with the UN Guiding Principles on Business and Human Rights (UNGPs), we consider whether we cause, contribute to or are directly linked to modern slavery through our business activities.

Hydroflux takes a proportionate risk-based approach to identify and assess modern slavery risks by considering indicators and drivers across:



Risks In Our Operations

As an employer, Hydroflux recognises that modern slavery risk can arise where employment practices do not meet legal or ethical standards, particularly in relation to vulnerable workers, recruitment practices, underpayment, insecure work, or barriers to raising concerns.

However, consistent with FY25, the overall risk of modern slavery in our operations is assessed to be low because of our skilled workforce, formal employment controls, and compliance with applicable workplace laws.

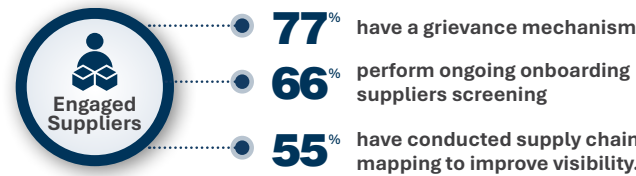
Risks In Our Supply Chains

Consistent with the UN Guiding Principles on Business and Human Rights, Hydroflux may be directly linked to modern slavery through the activities of suppliers or may contribute to risk where procurement decisions indirectly enable exploitative practices. Considering that there were no significant changes to our supply chains during the FY26 period, a proportionate risk-based approach was applied, focusing on identifying changes in our supplier profile and associated geographic risk.

Sector and industry, product and services, and geography remained an important driver of inherent risk. While most priority overseas suppliers operated in lower- or medium-risk jurisdictions, some suppliers had operations or key suppliers in higher-risk countries including Türkiye, United Arab Emirates, Philippines, and China. These jurisdictions may present heightened risk due to structural factors such as discrimination, weaker enforcement of labour protections, and reliance on migrant or informal labour, according to the Walk Free Global

Slavery Index (2023). Sector and industry-based inherent risks may also arise where supply chains involve vulnerable worker groups, complex subcontracting, or labour-intensive production, according to the Guidance on Reasonable Steps Inherent Risk Tool (2025).

In FY25, Hydroflux issued a questionnaire to 60 priority suppliers. The findings indicated that our supply chain has relatively strong controls in place. This data continued to inform the FY26 assessment for suppliers that remained classified as priority across FY25 and FY26. Therefore, of these common priority suppliers, 77% have a grievance mechanism, 66% perform ongoing onboarding suppliers screening, and 55% have conducted supply chain mapping to improve visibility.



Based on desktop research and applied FY25 questionnaire results, priority suppliers were generally assessed as low to medium risk. However, without direct engagement with all suppliers, visibility remains limited and may not provide a complete understanding of supplier practices and controls. Hydroflux will therefore continue to strengthen targeted supplier engagement to build a more robust understanding of risks that may arise on our supply chain. We are developing a supplier engagement plan to be implemented with key suppliers in the near term. In addition, a questionnaire will be issued to key suppliers every two to three years to reassess risk and identify any changes in supplier controls.

Our Actions To Address Key Modern Slavery Risks

Our People

The risk of modern slavery within our own operations remained low, as we continued to implement and strengthen measures that uphold fair and ethical employment practices. This includes maintaining robust employment procedures in alignment with legislation, onboarding training for all new employees, and employment screening. In FY26, Hydroflux:

- ✓

Continued to prioritise more secure employment arrangements (i.e. full-time and part-time).
- ✓

Continued tracking migrant worker status, including visa expiry, to improve visibility over potential vulnerabilities.
- ✓

Delivered an annual modern slavery Lunch & Learn session to maintain staff awareness of human rights risks and responsibilities.
- ✓

Continued providing grievance access for employees through a confidential staff email channel to raise workplace or modern slavery concerns.
- ✓

Undertook the annual management review of HR policies and procedures to ensure alignment with changes in any relevant legislation.
- ✓

Continued promoting access to the Employee Assistance Program (EAP), providing confidential, external advice and counselling support to all staff.

The way we manage modern slavery risks is supported by our key policies and procedures:

Modern Slavery Policy, which outlines Hydroflux's commitment to prevent, detect, and address modern slavery risks across our operations and supply chains, defines governance and reporting responsibilities, and reinforces our zero tolerance for inaction.

Industrial Relations Management Policy, which sets expectations for fair, lawful and transparent workplace relations, including equal opportunity, freedom of association and grievance resolution.

Discrimination, Bullying and Sexual Harassment Policy, setting the direction on how we will behave, interact and work together to live and work free of fear, discrimination, bullying and sexual harassment.

Leave Policy, supporting equitable and flexible work arrangements.

Risk Management policy, to ensure that environmental aspects and health and safety hazards are systematically identified, assessed, and controlled to eliminate or mitigate potential impacts.

Workers Compensation Policy, for the compensation and management of work-related injuries.

Working Alone Policy and Working from Home Policy, to remove or reduce risks to the health, safety and welfare of all employees who work alone or from Home.

Corrective Action Request Procedure, ensuring all non-conformities of the Hydroflux Integrated Management System (IMS) including unsafe work practices are identified, documented, and analysed.

Employment Lifecycle Procedure, ensuring employees are trained and competent to undertake their role and are aware of Hydroflux policies, processes and procedures.

Diversity, Equity and Inclusion Policy, outlining our approach to creating a workplace where all individuals are respected, supported and able to succeed.

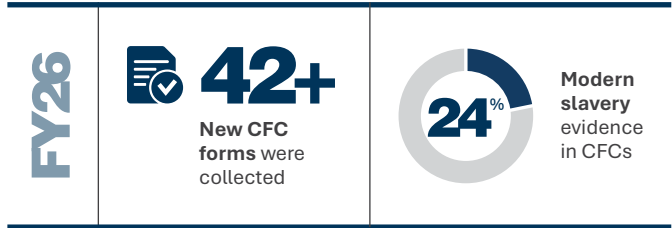
How We Resolve Grievances

Hydroflux’s grievance process is set out in its Industrial Relations Management Policy and supported by the Corrective Action Request (CAR) Procedure. Workers can raise concerns through management or via the confidential staff email. Issues are documented and reviewed promptly, with a meeting to seek resolution held, and if not resolved, may be escalated to mediation. Where concerns indicate a non-conformance or broader systems issue relating to the IMS, a CAR may be raised to investigate the root cause, assign corrective actions, track progress, and review effectiveness through an Annual Review meeting. This provides a clearer pathway for concerns to be raised, investigated, escalated and addressed.

A Whistleblower Policy is currently in development and will be implemented in FY27. This will serve as a tool to provide a safe and confidential mechanism to raise concerns, including concerns related to labour practices or potential modern slavery, and be investigated and assessed appropriately and on a timely basis.

Our Suppliers

Hydroflux continued to address modern slavery risks in its supply chains through supplier onboarding, due diligence and ongoing review processes. At onboarding, all new contractors, fabricators and consultants are required to complete a qualification and review process in alignment with the Approved Supplier Procedure and CFC Procedure. Suppliers are asked to provide company and insurance information, confirm whether they have modern slavery statements or policies, and to demonstrate their compliance with ISO standards by submitting supporting documentation. In FY26, 42 new CFC forms were collected, of which modern slavery policy evidence was received for ~24% of these CFCs – a significant increase from 8% in FY25.



Hydroflux also continued to assess priority Tier 1 suppliers through a desktop review process and considering responses from the questionnaire issued in FY25, which provides visibility over sector and industry, product and services, geographic, and entity risks. Findings from our annual assessment support Hydroflux’s continued focus on engaging suppliers in higher-risk categories and improving the quality of information gathered over time, as well as informing our supplier engagement moving forward.



Supplier management continues to be supported by Hydroflux’s broader procurement and governance framework, including the Approved Supplier Procedure, CFC Procedure, and Sustainable Procurement Policy. Additional measures, including safety audits and timely payment practices, have been maintained to reinforce our expectations of ethical conduct and fair treatment of workers in its supply chains.



To further strengthen this framework, Hydroflux is developing a Supplier Code of Conduct, which will set out clear expectations of suppliers regarding modern slavery, labour practices, ethical conduct, and health, safety, environmental and quality management. Hydroflux is also planning a structured approach to strengthen engagement with key and higher-risk suppliers directly, supporting more consistent communication of expectations and follow-up on due diligence findings.

Our Actions To Assess The Effectiveness Of These Actions

Hydroflux continues to integrate modern slavery oversight into its broader risk management framework. Our IMS, aligned with ISO 31000:2018, together with oversight by the IMS Manager and the Hazards and Aspects Management Procedure, provides the foundation for identifying, assessing and managing risks.

In FY26, Hydroflux maintained several mechanisms to assess the effectiveness of its actions to address modern slavery risks. These included:

Internal Grievance Mechanism

Hydroflux maintains a confidential staff email to report grievances to track and assess whether issues are being raised, escalated, and resolved appropriately. In FY26, there were no grievances reported.

Embedding Due Diligence In Supplier Management

Hydroflux continued to collect and review supplier information through the CFC process as part of onboarding and supplier management.

IMS Internal Audit

The IMS manager conducts internal audits under the IMS, evaluating compliance across Hydroflux’s operations, including health, safety, environmental, and quality management. These focus on direct activities and on-site contractors, helping to monitor supply chain compliance.

Baseline Metrics

Hydroflux continued to track baseline indicators, including grievances, internal audit findings and supplier modern slavery information collected through the CFC Form.

Conducting Annual Reviews Of The Modern Slavery Response

Hydroflux ensures risk assessments remain current and reflective of changes in operations, supply chains, and regulation as part of the preparation of the annual Modern Slavery Statement.

Governance & Review

Responsibility for day-to-day oversight of modern slavery risk sits with the IMS Manager as part of Hydroflux’s broader compliance framework. Each year, Hydroflux reviews its modern slavery risks, actions and priorities through its annual risk assessment and internal review processes.

Continuous Improvement

The mechanisms in place provide a strong basis for monitoring the effectiveness of Hydroflux’s actions over time. Given the complexity of addressing modern slavery risk, we remain committed to continually improving our approach:

Focus Area	FY27 Continuous Improvement Initiatives
Our People	Create an internal resource hub, accessible to all staff, consolidating our modern slavery policy, modern slavery statement, grievance reporting channels, guidance on how to raise concerns, general modern slavery information, and additional material on relevant legislation and frameworks
	Publish and implement the Whistleblower Policy
	Conduct awareness raising activities including staff training, internal newsletter communications, and a targeted training for sales teams
Our Suppliers	Publish and implement the Supplier Code of Conduct
	Conduct a supplier engagement session with key suppliers to share progress and gather actions in the supply chain
	Engage priority suppliers through questionnaire, building on FY25 results
	Create a Modern Slavery Supplier Toolkit to provide our suppliers with practical guidance and tools to identify, assess, and address modern slavery risks in their operation



We believe every organisation has a role to play in ending modern slavery. At Hydroflux, we hold ourselves accountable for ongoing due diligence and continuous improvement across our operations, supply chains, and partnerships.

Thank You

Feedback & Contact

For questions, feedback, or concerns related to this Modern Slavery Statement, please contact:



Head Office

Hydroflux Pty Ltd
Level 26, 44 Market Street
Sydney NSW



info@hydroflux.au



www.hydroflux.au