HYDROFLUX
WATER | SCIENCE | TECHNOLOGY



Modern Slavery Policy

November
2026

Australia
1300 417 697
www.hydroflux.au

New Zealand
09 352 2052
www.hydroflux.nz

Fiji
773 6950
www.hydroflux.com.fj



About This Policy

Scope

This Modern Slavery Policy applies to all full-time, part-time and casual employees of the Hydroflux Group as well as contractors and subcontractors working for the Hydroflux Group: Hydroflux Pty Ltd, Hydroflux Epco Pty Ltd, Hydroflux Industrial Pty Ltd, Hydroflux Utilities Pty Ltd, Hydroflux Epco NZ Ltd, Hydroflux Industrial NZ Ltd, Hydroflux Utilities NZ Ltd, Hydroflux Pte Ltd (Fiji), Hydroflux Ltd (UK), Hydroflux Technology Pty Ltd & Cress Consulting Pty Ltd.

Purpose

The purpose of the policy is to ensure compliance with relevant Australian laws and international frameworks and outline our commitment to identifying, preventing, and addressing modern slavery risks within our operations and supply chains.

Our Commitment



Hydroflux maintains a zero tolerance for modern slavery inaction. We are committed to:

- Respecting the human rights of all people impacted by our operations and supply chains.
- Acting with integrity, transparency, and accountability in our business relationships.
- Taking proactive steps to identify, prevent, and mitigate modern slavery risks.
- Promoting ethical labour practices through engagement, training, and continuous improvement.

Responsibilities

Every Hydroflux employee, contractor, and supplier has a role to play in upholding this policy.

Management will monitor policy compliance, maintain records, and oversee audits and training to ensure the policy is implemented and integrated into business operations and procurement processes.

All employees will report suspected or known instances of modern slavery or unethical practices.



Reporting Concerns

Hydroflux encourages openness and will support anyone who raises genuine concerns in good faith. Reports of actual or suspected modern slavery can be made through:

- Line Manager or Director
- The IMS Manager
- The Confidential Employee Grievance Email
  staff.confidential@hydroflux.com.au

How We Will Respond

All reports will be handled promptly, confidentially, and with integrity. Hydroflux will:

- Investigate concerns in line with our Risk Management Policy.
- Take steps to protect affected workers and escalate serious matters to relevant authorities.
- Collaborate with suppliers to remediate issues before considering disengagement.

No one will suffer detrimental treatment for raising a concern in good faith.



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Relevant Legislation & Standards

This policy supports alignment with the following legislation and frameworks:

- Australian Federal legislation
- Modern Slavery Act 2018 (Cth)
- International conventions ratified by Australia and New Zealand
- ILO Convention concerning Forced or Compulsory Labour, 1930 (No. 29)
- ILO Protocol of 2014 to the Forced Labour Convention, 1930 (No. 29)
- ILO Convention concerning the Abolition of Forced Labour, 1957 (No.105)
- ILO Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, 1999 (No. 182)
- Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, 2002

Definitions

For the purposes of this policy, modern slavery is defined in accordance with the Modern Slavery Act 2018 (Cth), which incorporates conduct that would constitute an offence under the human trafficking, slavery and slavery-like offence provisions set out in Divisions 270 and 271 of the Criminal Code Act 1995 (Cth):

- **'Slavery'** is the condition of a person over whom any or all of the powers attaching to the right of ownership are exercised, including where such a condition results from a debt or contract made by the person.
- **'Servitude'** is the condition of a person (the victim) who provides labour or services, if, because of the use of coercion, threat or deception.
- **'Forced Labour'** is the condition the victim who provides labour or services if, because of the use of coercion, threat or deception, a reasonable person in the position of the victim would not consider himself or herself to be free.
- **'Deceptive Recruiting'** is the condition of a victim being deceived about whether they will be exploited through a form of modern slavery.
- **'Forced Marriage'** is where coercion, threats or deception are used or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony which causes the victim to marry without their free or full consent.
- **'Debt Bondage'** is the condition of a victim's services being pledged as security for a debt, the debt is manifestly excessive, the reasonable value of the victim's services are not used to liquidate the debt, or the length and nature of the victim's services are not limited and defined.
- **'Trafficking In Persons'** is the recruitment, transportation, transfer, harbouring or receipt of persons, by means of coercion, threat or deception, for exploitation through modern slavery.
- **'The Worst Forms Of Child Labour'** is where children are exploited through slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage, serfdom and forced or compulsory labour.



Management Of Non-Compliance

Where a supplier, contractor, or other third party is found to be in breach of this policy or associated contractual requirements, Hydroflux may take appropriate action to address the risk. This may include additional due diligence, request for Corrective Actions, review of commercial terms, suspension of work, or termination of engagement. Hydroflux may also be required to report certain matters to relevant authorities in accordance with applicable legislation. Actions will be proportionate to the severity of the issue and will prioritise the protection and remediation of any individuals who may be impacted.



Authorised by John Koumoukelis
Hydroflux IMS Director
December 2025

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Document Control

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Next Formal Review	May 2027

Details of any amendments made prior to the next formal review

Version	Details	Date
V1.00	Original	04/12/2025
V2.00	Annual Review	01/05/2026

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Thank You

Feedback & Contact

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

Head Office
Hydroflux Pty Ltd
Level 26, 44 Market Street
Sydney NSW

Australia
1300 417 697
info@hydroflux.au

New Zealand
09 352 2052
info@hydroflux.nz

Fiji
773 6950
info@hydroflux.com.fj