



Modern Slavery Statement FY25

About this statement

This Modern Slavery Statement (Statement) is for the financial year commencing 1 April 2024 and ending 31 March 2025.

This Statement is made on behalf of ALS Limited (ABN 92 009 657 489)¹ and the entities it owns and controls, including Australian Laboratory Services Pty Ltd (ABN 84 009 936 029)², collectively referred to in this Statement as “ALS” or “the Group”³. This Statement is made for the purposes of the Australian Modern Slavery Act 2018 (Cth) (the Australian Act) and section 54 of the United Kingdom’s *Modern Slavery Act 2015* (the UK Act) and has been approved by the Board of ALS Limited.

The table below sets out where the mandatory reporting requirements outlined within the Australian Act and the recommended criteria under the UK Act have been addressed in this Statement.

Australian Act mandatory reporting requirements	UK Act recommended reporting criteria	This Statement
Identify the reporting entity; and describe the structure, operations and supply chains.	Organisation’s structure, its business and its supply chains.	Pages 2, 8-12
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and the entities it owns and controls.	Parts of the organisation’s 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.	Pages 14-25
Describe the actions taken by the reporting entity and any entities that the reporting entity owns and controls to assess and address these risks, including due diligence and remediation processes.	Organisation’s policies in relation to slavery and human trafficking; and its due diligence processes in relation to slavery and human trafficking in its business and supply chains.	Pages 16-23, 27
Describe how the reporting entity assesses the effectiveness of these actions.	Organisation’s 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.	Pages 26-27
Describe the process of consultation with the entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).		Page 20
Any other relevant information.		Pages 4-7
	Training about slavery and human trafficking available to all staff.	Pages 17-18

1. ALS Limited is a publicly listed company on the Australian Securities Exchange (ASX:ALQ), with corporate headquarters in Brisbane, Australia.

2. This Statement is made as a joint statement under the Australian Act for these entities. Australian Laboratory Services Pty Ltd (ABN 84 009 936 029) was a wholly owned subsidiary of ALS Limited in FY25, and together with ALS Limited comprise the reporting entities under the *Australian Modern Slavery Act 2018* (Cth) (the Australian Act). During the reporting period, Australian Laboratory Services Pty Ltd was 100% directly owned by ALS Limited.

3. A list of controlled entities with a contribution to the ALS Group’s consolidated revenue of at least 1.0%, and also the main legal entity in every country where the Group has permanent operations, even where such legal entity represents less than 1.0% of the Group’s consolidated revenue, is included at Note 5b Global operating entities and ultimate parent in the ALS FY25 Annual Report. With the exception of specific supplier-related information within this report, data relating to Nuvisan and Wessling acquisitions is not included in this statement.

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A message from our CEO

Modern slavery is an enduring global challenge – one that's often hidden and complex. Addressing it demands our sustained attention, leadership and a clear commitment to protecting the human rights and dignity.

I am proud to present ALS' ninth Modern Slavery Statement in response to the United Kingdom *Modern Slavery Act 2015* and our sixth in response to the Australian *Modern Slavery Act 2018 (Cth)*. It reaffirms our unequivocal position that modern slavery has no place at ALS and sets out the steps we have taken to prevent it from occurring in our operations and supply chains.

As a global leader in scientific testing and analysis, operating across a diverse and expanding network of countries, we have a responsibility to ensure our people, partners and suppliers uphold the highest standards of ethical conduct. In FY25, we advanced our program to identify, assess and address modern slavery risks, with a sharper focus on building capability, applying a risk-based lens and driving accountability.

Awareness and understanding of modern slavery issues grew across the business through targeted training for procurement, supply chain, corporate and leadership teams. These programs are firmly embedded and supported by accessible, confidential channels for raising concerns.

We also launched an independent audit program with an accredited third-party provider in our own facilities, focusing first on countries with elevated risk indicators. These audits conducted in Mexico and India provided assurance on labour standards, working conditions and health and safety, and offered valuable insights to guide future priorities.

Our engagement with suppliers deepened, with a stronger onboarding process, updated contractual terms and clearer expectations through our Supplier Code of Conduct and guidance around modern slavery risks. We also began a due diligence program including third-party supplier audits to be rolled out in FY26.

Management accountability was reinforced through our compliance certification process, with leaders at each site confirming that their teams understand modern slavery risks and feel empowered to speak up if concerns arise.

Progress this year was achieved through close collaboration across our procurement, supply chain, sustainability, legal, governance, risk, HR and finance teams. Looking ahead to FY26, we will continue to strengthen our framework, build even closer relationships with our suppliers, and stay vigilant in our shared commitment to help eliminate modern slavery in all its forms.



Malcolm Deane
CEO and Managing Director

Our FY25 key achievements

Delivered modern slavery training to executive leaders and corporate, procurement and supply chain functions; made training available to all employees.



>95% completion of Code of Conduct training, boosting global awareness of modern slavery risks across operations and supply chains.



Strengthened human rights provisions in supplier terms and conditions, now attached to every purchase order.



Independent third-party audit program introduced for added assurance across operations and suppliers.



Supplier onboarding strengthened to reinforce expectations on modern slavery from the outset.



Increased business and supply chain engagement on modern slavery risks.



Supplier Code of Conduct updated with additional guidance on modern slavery risks to raise supplier awareness.



Who we are

A global leader in testing

ALS provides comprehensive testing solutions to clients in a wide range of industries around the world.

Using state-of-the-art technologies and innovative methodologies, our dedicated international teams deliver the highest-quality testing services and personalised solutions supported by local expertise. We help our clients leverage the power of data-driven insights for a safer and healthier world.

Our values

SAFE

RESILIENT

CURIOUS

COMMITTED

CARING

HONEST

Our brand promise

Right solutions.
Right partner.

Our vision

To be the global leader in the discipline of scientific analysis in pursuit of a better world for all.

Our mission

To help our clients leverage the power of testing and data-driven insights for a safer and healthier world.

Our purpose

To help make the world a better place through science, assurance and sustainability.



Our commitment

ALS is committed to ethical and responsible business conduct, including respecting and protecting the human rights of our employees, customers, business partners, suppliers and their workforces, and the people living in the communities where we operate.

We recognise that modern slavery risks⁴ exist in our supply chains and may also be present in our operations. To help eradicate modern slavery risks and ensure we are not complicit in human rights abuses, we must continue to collaborate with our employees, suppliers and other stakeholders to understand and manage this risk.

Our position on modern slavery is clear – it has no place in our business and contradicts our values. We are committed to understanding in detail how our activities may cause, contribute to, or be directly linked to modern slavery practices.

We treat our employees, partners in our supply chains, and people living in the communities where we operate with dignity and respect. Partnering with third parties who uphold human rights and demonstrate sound ethical performance, is a priority. Additionally, we expect our employees and anyone who works for us, or on our behalf, to respect and uphold the human rights of others and to partner with us to combat modern slavery.

4. ALS considers situations of modern slavery to be those where coercion, threats or deception are used by offenders to exploit victims and undermine their freedom, including human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, and the worst forms of child labour.

Respect for human rights is central to how we do business and is embedded in our Code of Conduct and our Human Rights Policy.



Our structure and operations

ALS is one of the world's largest providers of analytical and testing services. We serve multiple industries globally, with a workforce of more than 20,000 people operating from more than 420 sites in 70+ countries across Africa, Asia, Australia and New Zealand, Europe, the Middle East and the Americas.

For more than 45 years, we have provided testing and technical solutions to clients in a wide range of industries around the world. We've built our global reputation by embracing cutting-edge technologies and methodologies to deliver innovative, high-quality testing services to our clients.

With corporate headquarters in Brisbane, Australia, we are listed on the Australian Securities Exchange (ASX Code:

ALQ) and are an ASX100 company with a multibillion-dollar market capitalisation.

Our mission is to help our clients leverage the power of testing and data-driven insights for a safer and healthier world. Innovation, sustainability and purposeful growth are in our corporate DNA. Guided by integrity we consistently deliver the highest-quality work and reliable customer service.

Countries

70+

Locations

450+

Revenue (AUD)

3b

Staff worldwide

22k+



Our services

We operate across five business streams – Food, Pharmaceutical, Minerals, Environmental and Industrial materials – each led by an executive general manager reporting to the Chief Executive Officer.

Through these streams, our teams deliver analytical testing and inspection services spanning oil and lubricants, environmental and occupational hygiene, food and beverage, mining and commodities, beauty and personal care, and pharmaceutical and healthcare.

Visit alsglobal.com to learn more about our services and the industries we serve.

Environmental



Oil and lubricants



Food and beverage



Mining and commodities



Beauty and personal care



Pharmaceutical and healthcare



Our testing solutions

Driven by our vision to be the global leader in the discipline of scientific analysis in pursuit of a better world for all, we're committed to meeting our own sustainability obligations and goals, and to helping our clients improve theirs through innovative testing services and reliable data.

Environmental	Our environmental testing services help keep our communities clean and safe by:	<ul style="list-style-type: none"> → Testing surface and ground waters → Testing wastewater and trade effluents → Testing air, soil and waste → Providing our clients with data that support them to comply with environmental regulations.
Oil and lubricants	Our oil and lubricants services help ensure operational efficiency and environmental responsibility by:	<ul style="list-style-type: none"> → Testing fluids to support clients to keep their equipment in safe, working, order, and maximising machine lifespan → Testing lubricants to extend drain intervals and prevent efficiency loss from elevated friction.
Food and beverage	Our food and beverage services help ensure quality and safety by:	<ul style="list-style-type: none"> → Determining key constituents of food and beverages, including nutrition facts, vitamins, minerals and additives → Testing for allergens in food → Testing for contaminants including microbial, pesticides and other harmful chemicals.
Mining and commodities	Our mining and commodities services support sustainable outcomes by:	<ul style="list-style-type: none"> → Developing geochemical methods for various minerals supporting energy transition → Being a key provider of testing for energy, battery and critical minerals analysis → Identifying the most efficient way to extract mineral from ore through our Metallurgy services.
Beauty and personal care	Our beauty and personal care services support safety and efficacy by:	<ul style="list-style-type: none"> → Testing raw material and finished formulations for safety purposes → Conducting clinical trials such as patch testing → Performing shelf-life and period-after-opening studies.
Pharmaceutical and healthcare	Our pharmaceutical and healthcare services contribute to health and well-being by:	<ul style="list-style-type: none"> → Supporting initial analytical development from clinical trials through to higher-volume quality-control testing post-commercialisation for active ingredients and impurities, and stability testing. → Supporting physical, chemical and analytical testing needs across the entirety of pharmaceutical manufacturing operations.

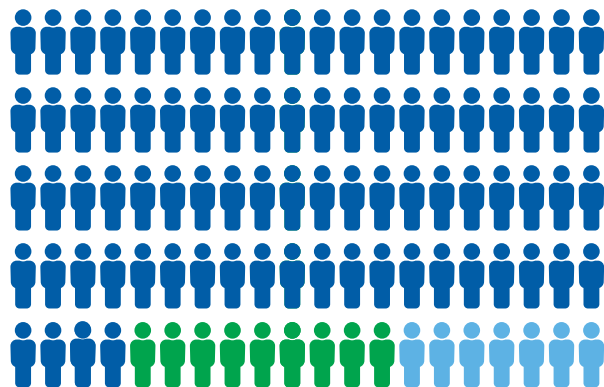
Our workforce

With operations spanning more than 450 locations in 70+ countries, our 22,000-strong global workforce has kept pace with our growing business. In FY25, through the strategic acquisitions of Nuvisan, Wessling and York and expansion of operations, we welcomed new employees from Germany, France, Romania, Switzerland and the USA.

Our global workforce is comprised of more than 82 per cent (18,836) full-time workers. In FY25, ALS paid more than AUD\$1.4 billion in wages to our employees around the world, contributing to local economies.

We continue to operate in at least seven LDCs (Least Developed Countries, as defined by the UN Department of Economic and Social Affairs) including, Burkina Faso, Cambodia, Ethiopia, Lao People's Democratic Republic, Mali, Senegal and Zambia. We value our collaboration with employees worldwide and recognise the positive impact our work has in supporting the economies of these nations.

22,000 Total number of employees



84%
Full time

9%
Part time

7%
Casual



Supply chains

Our supply chains include the supply of goods and services in all of the regions where we operate.

Broadly these supplies fall into the equipment (including maintenance and servicing), chemicals, consumables, gas, transport and freight, and facilities management and maintenance services categories. The Group also procures the services of various professional advisers and other services, such as those provided by finance and banking institutions. Labour is also occasionally procured via sub-contractors, agency staff and recruitment agencies. The main supplies for each of our service offerings include:



Environmental

Solvents
Acids
Hydrogen peroxide
Laboratory plasticware
Laboratory glassware
Syringe filters and other flat filters
Aluminium dishes
Certified reference materials
Analytical instrument consumables
Microbiological media
Gas – Argon, Nitrogen and Helium
PPE including lab coats and gloves



Oil and lubricants

Sample bottles
Mailing containers
Cardboard boxes
Large cardboard shippers
Pre-addressed postage satchels
Sample information sheets
Sample tubes and plastic bags
Oil sample pumps
PPE including lab coats and gloves



Food and beverage

Microbiological media
Petri dishes
Analytical instrument consumables
Chemicals, including solvents
Ethanol
Sterile plastic containers
Sterile swabs
Agar
Rapid tests
PPE including lab coats and gloves



Mining and commodities

Lead oxide flux
Acids
Crucibles and cupels e.g. clayware, ceramic, graphite
Consumables for jaw crushers and pulverisers
Laboratory plasticware
Wet strength, plastic and calico bags for samples
PTFE laboratoryware
Certified reference materials
Analytical instrument consumables
Platinumware
XRF flux
Metallographic consumables
PPE including lab coats and gloves



Beauty and personal care

Sterile plastic and glass sample containers
Sterile laboratory plastic ware e.g. serological pipettes, well plates, petri dishes
Filter cups
Media
Solvents
Ethanol / viraclean
Cultures (LAL)
Sterile swabs
Sterile filter paper
Reference materials
Instrument consumables
PPE including lab coats and gloves



Pharmaceutical and healthcare

Microbiological media
Petri dishes
Analytical instrument consumables
Chemicals, including solvents
Ethanol
Sterile plastic containers
Sterile swabs
Standards
Columns
Spare parts
Gas
PPE including lab coats and gloves

Supplier spend

Our total supplier spend for FY25 was approximately AUD\$786 million.

The total supplier spend for the entities comprising 75 per cent of the Group's total revenue for FY25 was approximately AUD\$550 million.

The following outlines our understanding of the ways in which our operations and supply chains may cause, contribute to or be directly linked to modern slavery through the Group's FY25 top 40 suppliers by supplier type.

Manufacturer

Potentially higher risk to ALS of causing, contributing to, or being directly linked to, modern slavery practices. However, typically greater transparency is available to the procurer of the product about the manufacturing process.

Distributor

Potentially lower risk to ALS of causing, contributing to, or being directly linked to, modern slavery practices, since the distributor is typically not involved in the product manufacturing process; but potentially higher risk to ALS of causing, contributing to, or being indirectly linked to, modern slavery practices since the product manufacturing process is typically less transparent in these arrangements.

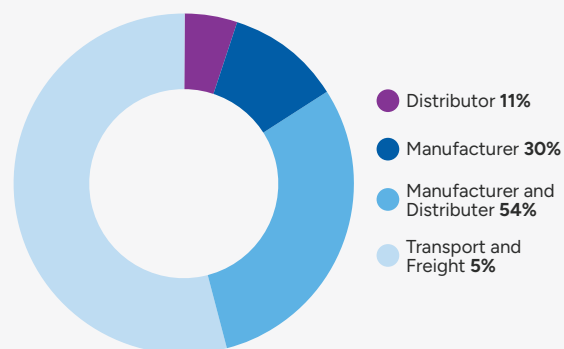
Manufacturer and distributor

Potentially higher risk to ALS of causing, contributing to, or being directly linked to, modern slavery practices depending on the role the supplier plays in relation to the product procured by the Group.

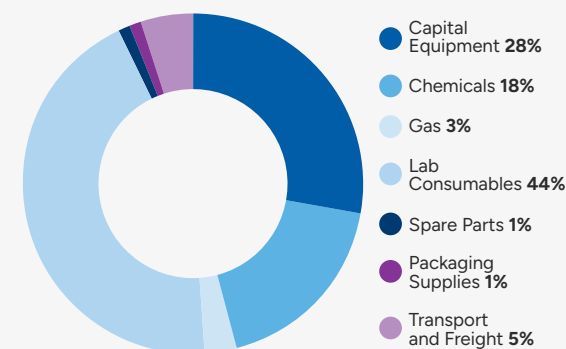
Transport and freight

Potentially higher risk to ALS of causing, contributing to, or being indirectly linked to, modern slavery practices predominately associated with labour exploitation through typically less transparent sub-contractor labour and agency worker arrangements.

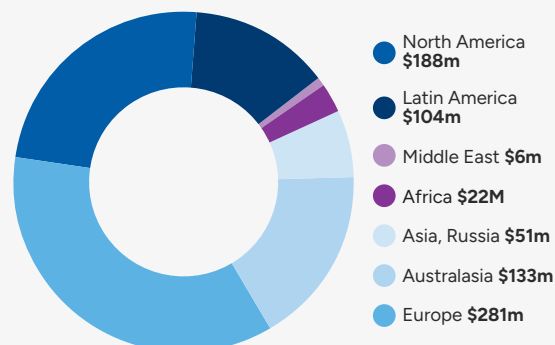
FY25 top 40 suppliers by supplier type



FY25 Categories of supply

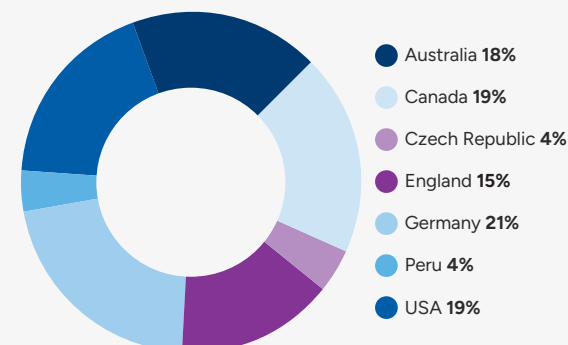


FY25 Supplier spend by region



FY25 Top 10 ALS Group Entities by total supplier spend

**based on country of incorporation*



Modern slavery risks

As a provider of professional services, the Group does not operate in a sector or industry identified as having high modern slavery risks. However, we remain diligent in our efforts to examine our operations and supply chains to understand the potential for modern slavery practices to arise.



Risks in our operations

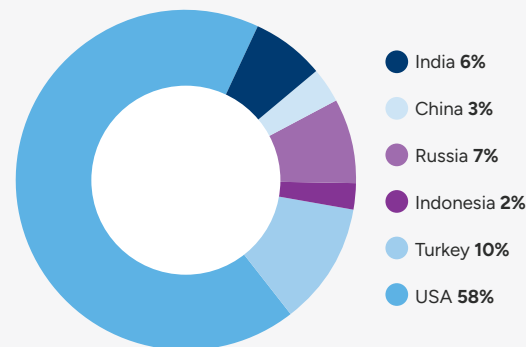
Our employees are central to our business success, so our commitment to respecting human rights starts with recognising and addressing the risks of modern slavery in our operations.

Our enterprise-wide Risk Management Framework imposes responsibility and empowers employees at all levels of the business to identify and manage risks. The Board and executive leadership team have zero appetite for poor labour practices, including modern slavery.

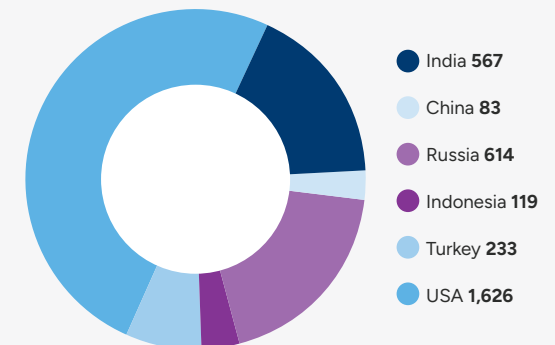
This shared responsibility, combined with our enterprise-wide Risk Management Framework, and the specific actions we take in response to modern slavery, means the likelihood of modern slavery practices occurring in our operations continues to be considered unlikely.

As our operations span over 70 countries, the Group recognises that, however remote, we must remain alert to the possibility of modern slavery practices arising in our operations. As at 31 March 2025, the Group had 3,242 employees located across six of the ten countries that the Walk Free Global Slavery Index 2023 states have the largest estimated numbers of people in modern slavery⁵, as depicted in the charts below. This will continue to factor into the Group's risk-based approach to address potential modern slavery risks in our operations.

Number of ALS locations for the six higher-risk countries



Number of ALS employees for the six higher-risk countries



5. In order to identify higher-risk countries we have used the Walk Free 2023, The Global Slavery Index 2023, Minderoo Foundation, page 26, which lists the "10 countries with the largest estimated numbers of people in modern slavery". Collectively, these countries — India (11 million), China (5.8 million), North Korea (2.7 million), Pakistan (2.3 million), Russia (1.9 million), Indonesia (1.8 million), Nigeria (1.6 million), Türkiye (1.3 million), Bangladesh (1.2 million), and the United States (1.1 million) — account for nearly two in every three people living in modern slavery and over half the world's population."

Risks in our supply chains

The Group procures certain goods and services that carry heightened modern slavery risks due to their nature, or how they are manufactured or provided, including where they are provided or sourced from.

In FY25, we continued to evaluate the risk of the Group to cause, contribute to, or be directly linked to modern slavery practices by examining our operations and supply chains. We used our existing framework, which considers the location of our operations and supply chains in the context of Group revenues and spend, volume of supply (excluding suppliers of property and utilities, construction and finance and banking facilities), and countries of export.

In addition, the supplier type (manufacturer, distributor, etc), and the risks associated with the supplier type were also considered – see page 13 for the outcome of this assessment.

In FY25 our total number of suppliers was 10,004. To identify potential higher-risk suppliers, we assessed our purchases using this framework across entities that comprise 75 per cent of the Group's FY25 revenues. We have reviewed the total number of suppliers under each of the below procurement categories with higher potential for modern slavery practices, including the procurement of electronic-related goods, transport and freight services, laboratory consumables, support services, and branded or provided merchandise, as described below.

- Electronic-related goods such as analytical testing equipment, computers, mobile devices, tablets, scanners and printers, with heightened risks identified predominately associated with the manufacturing suppliers of our direct suppliers operating in countries where there is a high degree of foreign migrant labour and lack of legal protections and or enforcement of protections for migrant labour.
- Transportation, freight and logistics services, with heightened risks identified predominately associated with sub-contractor labour and agency workers.
- Laboratory consumables (such as gloves, other safety supplies and protective equipment, acids, clayware, flux, glassware, oil-kits, utensils and tools), with heightened risks identified predominately associated with the materials incorporated into these consumables, such as rubber.
- Services supporting our laboratories and offices, such as those related to cleaning and laundry, security, maintenance, waste management, agricultural and landscaping, recruitment and labour hire, and catering and hospitality. The heightened risks identified are predominately due to these services typically involving lower wages and manual labour which has a higher risk of modern slavery practices.
- ALS branded and provided merchandise, such as clothing garments and uniforms, aprons, branded stationery and promotional items, with heightened risks identified predominately due to the higher risk of modern slavery practices associated with composite materials (such as textiles and the fashion industry, paper and cardstock).

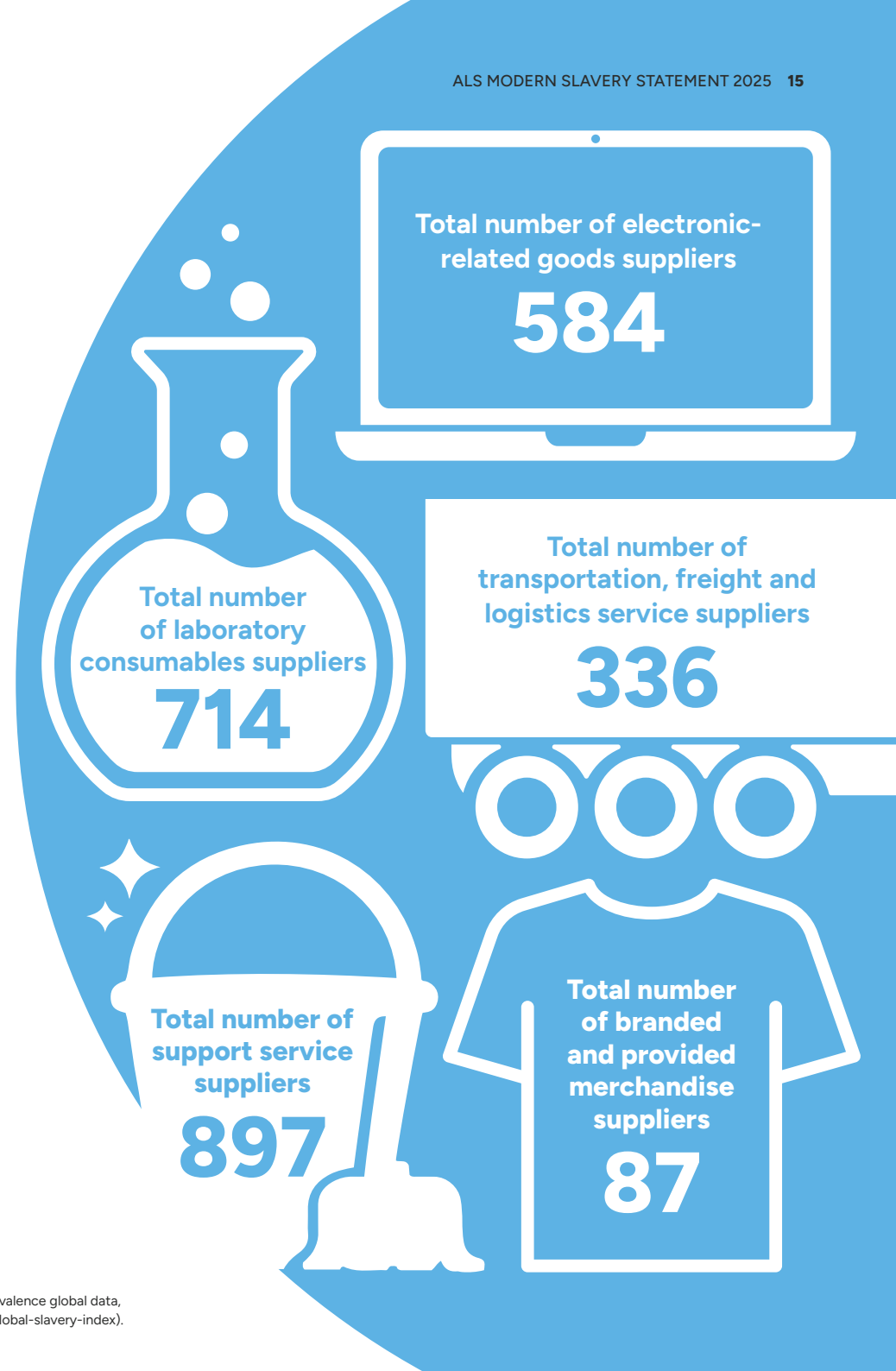
Risk level assessment based on country information of supplies for Group entities comprising 75 per cent of the Group's FY25 revenues⁶

Low 38

Medium 16

High 6

⁶ Risk-level assessment based on information contained in the Walk Free 2023, The Global Slavery Index 2023, Minderoo Foundation – World Map – Prevalence global data, indicating Walk Free's assessment of the estimated proportion of population living in modern slavery per thousand people (available at walkfree.org/global-slavery-index).



Our approach to managing modern slavery risks

The ALS Limited Board Sustainability & Innovation Committee oversees the Group's management of modern slavery risks by supervising the Group's Sustainability Program.

Management oversight of the Group's response to modern slavery sits primarily with our Sustainability team, led by our Chief Strategy Officer. The Sustainability team is focused on devising the Group's strategy to address the risk of modern slavery in our operations and supply chains, policy development, education and awareness, and incident management and remediation.

Our approach to assessing and addressing the risks of modern slavery in our operations and supply chains is linked to several fundamental elements. This includes how we lead; build competency and capability; develop policies, procedures and processes; embedding expectations; facilitate incident management; monitor and assess effectiveness; and report.

We support this approach with various policies and training programs, including our Code of Conduct, Human Rights Policy & Procurement and Supply Chain Policy. These policies are backed by mandatory Code of Conduct training.

Our Modern Slavery Awareness training is also mandatory for all executive leaders, and corporate and procurement, and supply chain teams. All employees also have access to this additional training, along with Recruitment Management Guidelines. Our risk-based supplier onboarding process includes targeted questions on modern slavery risks to help inform supplier reviews and risk assessments. Other key policies and tools include the Supplier Code of Conduct, contractual protections, compliance certification process, Whistleblower Policy, and the ALS Business Integrity Helpline and ALS Your Voice Helpline.



Governance

Leadership

- Commitment to, and leadership in, addressing modern slavery risks in our operations and supply chains from ALS Limited's Board, CEO, and our Executive Leadership Team.
- Communication of our commitment to addressing the risks of modern slavery in our operations and supply chains to our employees and our suppliers.

Building competency and capabilities

- Raising awareness and educating our employees about the Group's position regarding human rights including modern slavery.
- Making a detailed Modern Slavery Awareness training course available to employees, including those who have oversight of, and responsibility for, the procurement of goods and services. The course aims to raise awareness about the risks and signs of modern slavery to inform their reviews and assessments, and actions to monitor for signs of modern slavery practices.
- Continuous awareness of and learning from external bodies about the challenges and lessons learned in managing modern slavery risks.
- Understanding the expectations of our stakeholders regarding our response to addressing modern slavery.

Documenting policies, procedures and processes

- Comprehensive policies and procedures to support a safe and fair working environment for our employees and our suppliers. This includes efforts to only engage with suppliers and business partners that respect and uphold human rights and demonstrate sound ethical performance prior to entering contracts to procure goods and services.
- Creating recruitment policies and procedures that uphold the fundamental rights and freedoms of all individuals.

Embedding expectations

- Embedding targeted modern slavery questions into risk-based supplier onboarding documentation.
- Embedding expectations into standard contract terms and conditions.

Facilitating incident management

- Making an independent, externally provided reporting mechanism (where anonymous reports can be made) available to our employees and supplier employees.
- Following a process to remediate identified modern slavery risks or reported modern slavery practices.
- Disclosing incidents of modern slavery practices identified or reported and undertaking remedial actions and lessons learned.

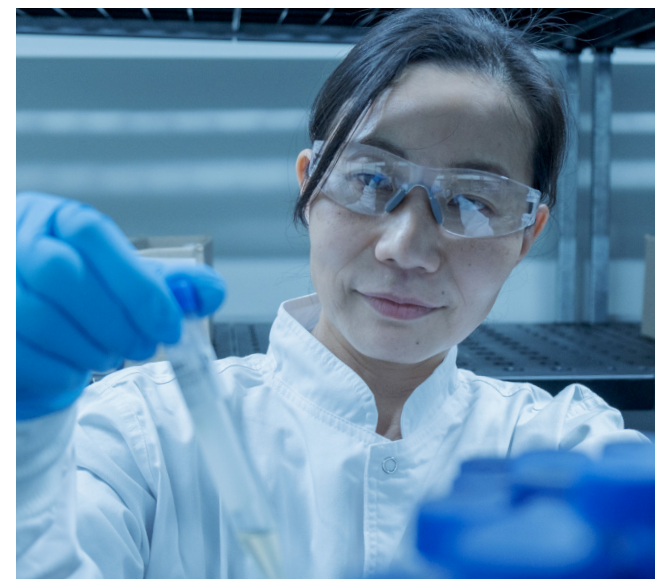
Monitoring and assessing effectiveness

- Continuously refining our supplier engagement approach and due diligence process to enhance modern slavery risk monitoring.
- Monitoring and assessing the effectiveness of our modern slavery risk management actions.

Reporting

Reporting publicly on the progress of our response to modern slavery:

- Modern Slavery Statement
- Sustainability Report.



Related policies



Code of Conduct

Articulates the standards of behaviour that ALS expects of everyone who works for, or on behalf of, ALS. Our Code of Conduct covers specific content on respecting human rights, with practical guidance on expected standards of behaviour.

Human Rights Policy

Outlines our commitment, communicates our position, and details the fundamental elements of our approach to protecting human rights. Our Human Rights Policy is reviewed annually and is available to all employees via our intranet.

Procurement & Supply Chain Policy

Sets out our commitments to integrity and sustainability in our supply chains by standardising Group-wide procurement and supply chain activities; consolidating our vendor base to leverage our Group spend with strategic suppliers; and reinforcing the expectations and requirements outlined in our Supplier Code of Conduct. Our Procurement and Supply Chain Policy is available to all employees via our intranet.

Modern Slavery Awareness training

Fundamental to assessing and addressing modern slavery risks in our operations and supply chains is enhancing employee awareness of these issues through our online Code of Conduct training course. In addition, a detailed Modern Slavery Awareness training course is completed by all executive leadership, corporate and procurement and supply chain teams. It is also available to all employees to self-enrol at any time.

Supplier Code of Conduct

Sets out the standards expected of our suppliers in relation to human rights.

The enhanced Supplier Code of Conduct now includes general information about modern slavery risks. We require our suppliers to commit to and adopt the principles and requirements outlined in the Code. During FY25 the Supplier Code of Conduct was embedded into ALS' standard terms and conditions for the supply of goods and services.

Contractual protections

Contractual terms (including representations and warranties) that relate to respecting internationally recognised human rights are incorporated into ALS' standard terms and conditions for the supply of goods and services which are attached to all purchase orders.

Compliance certification processes

Annual internal certification process to confirm employee awareness of modern slavery and the requirement to report any suspected instances of modern slavery or infringement of human rights in our operations and supply chains.

Whistleblower Policy, and ALS Business Integrity Helpline and ALS Your Voice Helpline

Encourages our employees and our suppliers and their employees to speak up and know they can safely report suspected or actual conduct that does not support ethical and responsible business conduct.

Our Modern Slavery Awareness course includes information on:

- Slavery and slavery-like practices, child labour, forced labour, human trafficking, debt bondage, servitude, and deceptive recruiting
- Distinguishing modern slavery from other forms of exploitation
- The prevalence of modern slavery
- Legal regimes to combat modern slavery
- The importance of addressing modern slavery our approach to modern slavery, including
- Risk assessments, taking action, monitoring and reporting
- Modern slavery due diligence
- High-risk supplier categories
- Undertaking modern slavery risk assessments.

Risk management

ALS maintains an enterprise-wide Risk Management Framework to identify, assess and manage risks across the Group, including those related to modern slavery and human rights. The Framework is embedded across all business units and functions globally, supporting consistent and effective risk oversight.

The Risk Management Policy and Framework operate as distinct but complementary components of ALS' broader risk governance approach. While Executive Management is responsible for the implementation of risk processes within the business, the Board retains oversight through the Audit and Risk Committee, which reviews the effectiveness of risk management systems and internal controls on an annual basis.

The Group's Risk Appetite and Tolerance Policy outlines ALS' approach to managing material business risks, including those linked to operational, strategic and compliance exposures. These risk appetites guide decision-making and support alignment with the Group's strategic objectives, values, ethical standards and regulatory obligations, including the management of modern slavery risks.

Further information on ALS' risk governance practices is available in the Risk Management Policy at alsglobal.com.



Consultation and collaboration

Consultation

The entities owned and controlled by ALS Limited all operate under the direction and governance of the Board of ALS Limited and share the same Executive Management Team.

These owned and controlled entities are managed as an integrated Group with enterprise-wide policies designed to be consistently applied. The Group's strategy for addressing modern slavery risks in our operations and supply chains is communicated throughout the Group by our Chief Strategy Officer via the Group's Executive Management Team.

During the reporting period, we actively engaged with our owned and controlled entities via the Group's Executive Management Team. This included consulting on legislative reporting requirements, the actions to implement our strategy and progress our response to modern slavery risks in our operations and supply chains.

This Statement has been prepared with input from employees working in our sustainability, legal, governance, risk and compliance, internal audit, procurement, supply chain, human resources and finance functions, and various other employees involved in our day-to-day operations.

All information and data gathered for the FY25 Modern Slavery Statement is subject to our Internal Certification process. The directors of the owned and controlled entities that are reporting entities pursuant to the Australian Act, which include members of the Group's Executive Management Team, have been consulted in relation to this Statement. Prior to going to the Board for review and approval, this Statement was reviewed by our Chief Strategy Officer, Group Sustainability Director, and the ALS Board Sustainability and Innovation Committee. The Committee oversees the Group's management of modern slavery risks by supervising the Group's Sustainability Program.

Collaboration

We acknowledge that addressing modern slavery risks requires us to bring our employees and suppliers on a journey of learning and understanding. This involves being open and transparent in sharing lessons learned and challenges faced while implementing the Group's response to protecting and upholding human rights.

The knowledge gained from shared insights and common challenges in identifying and remediating modern slavery practices, and understanding the success of varied approaches in overcoming these challenges, is critical.

Engaging with our employees, suppliers, investor groups, educational associations, and ESG rating agencies and supplier risk management solution providers during the year has helped refine our strategy to align more closely with best practice approaches and our commitment to the principles of the United Nation's Guiding Principles on Business and Human Rights. As we go forward, we will continue to collaborate with these third parties to strengthen our response to modern slavery.

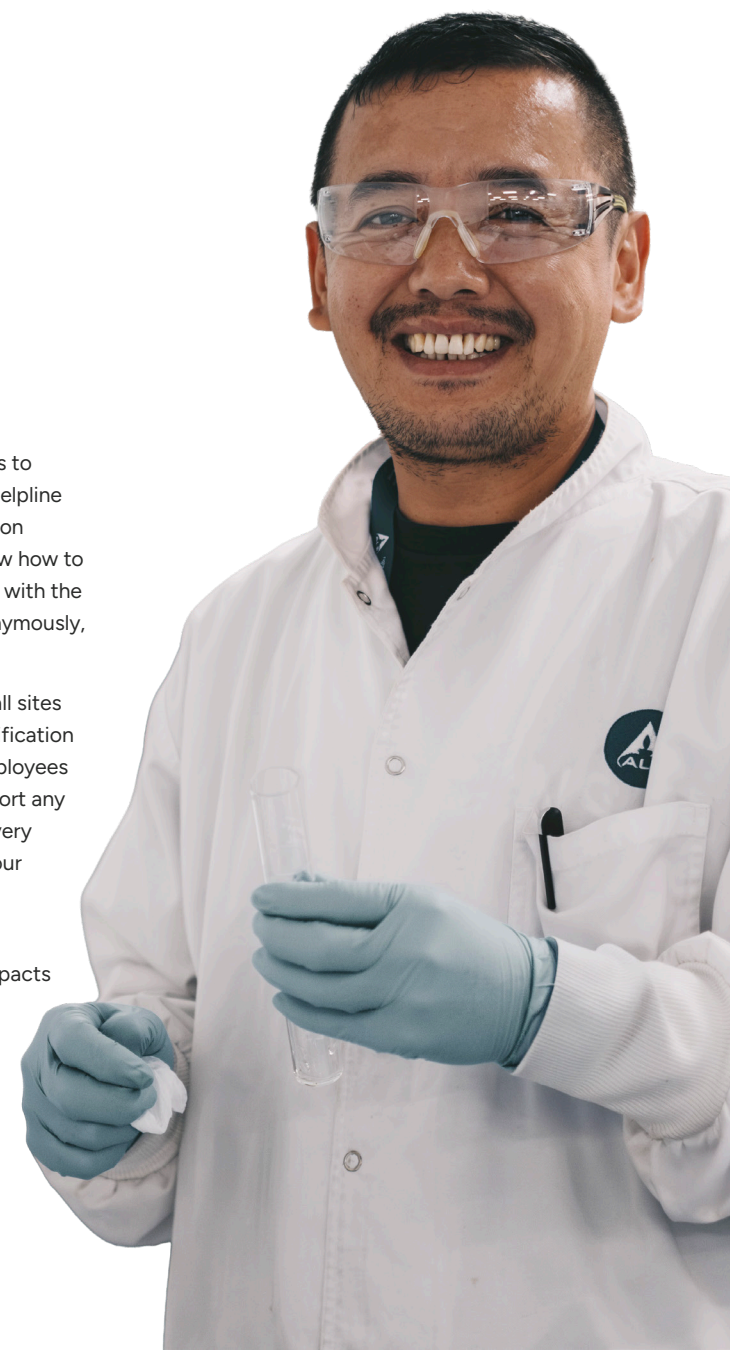


Actions taken to address modern slavery risks

Actions in our operations

Our annual risk assessment process focuses on identifying and managing the risk of modern slavery in our operations, which includes:

- Mapping our key policies, programs and activities that support our Human Rights Policy and comprehensive framework in place to mitigate adverse human rights impacts arising in our operations. Active policies, programs and activities reflect our commitment to protecting human rights. These cover diversity and inclusion; labour standards, wages, and benefits; freedom of association and collective bargaining; health, safety, and security; forced labour, human trafficking, and child labour; and reporting mechanisms. See page 22 for further detail.
- Incorporating modern slavery awareness-raising content in our Code of Conduct training so our employees understand the values that drive our organisation and standards of behaviour expected of them. Training highlights include:
 - The Group's commitment to respecting and protecting the human rights of all individuals and not engaging in any form of modern slavery
 - The policies that support our commitment to responsible and ethical conduct, so our employees are fully informed and can avoid making consequential adverse decisions
 - The mechanisms available to employees to report any actual or suspected behaviour that does not align with our Code.
- Our Code of Conduct training is available online and face to face. Completion is mandatory upon joining ALS and annually thereafter for employees to affirm their commitment to the Code. Completion details are retained on each employee's record.
- Providing clear guidance in our Code of Conduct about the importance of protecting human rights, including practical considerations when engaging with third parties.
- Providing an interactive online Code of Conduct portal including frequently asked questions on all topics. Links to external and internal resources empower employees to learn more about topics of interest.
- Requiring all site and office locations to display the ALS Business Integrity Helpline and ALS Your Voice Helpline poster on employee noticeboards so they know how to report behaviour that does not align with the Code, with the ability to report anonymously, if desired.
- Requiring operational managers at all sites to certify, as part of our annual certification processes, that they and all site employees are aware of the requirement to report any suspected instances of modern slavery or infringement of human rights in our operations and supply chains.
- Investigating all reports of actual or suspected adverse human rights impacts in our operations or supply chains, including protecting the privacy and confidentiality of anyone who reports.



Our human rights program framework

The outcome of a process to map our key policies, programs and activities that support our Human Rights Policy is summarised below.

Diversity, equity and inclusion

Diversity, Equity & Inclusion Policy: Includes measurable objectives for key diversity categories, including recruitment, leadership development and pay equity.

Executive-sponsored employee resource groups: Global Gender Equity (RISE), Global LGBTQ+ Network and BESIDE.

Recruitment Management Guidelines: Embodies our commitment to fair and merit-based recruitment and selection processes.

ALSTAR online Hiring for Success course: Supports rigorous, fair and non-discriminatory recruitment practices.

Workplace Bullying, Harassment & Discrimination Policy and online training: Reinforces our position and strict prohibition of all forms of bullying, harassment and discrimination.

Executive Development Program: Participants include a diverse selection of executive-nominated employees from all regions and business streams.

iLEAD Development Program: Advancing leadership competence, including how to create equal and inclusive teams.

New Leader Online Program: A resource for new leaders targeting fundamental knowledge and skill that will benefit all leaders

Frontline Leadership Program: Provides a consistent, global standard for how ALS enables its leaders to grow in leadership, communicate effectively, foster an inclusive and engaging

Training and communications: Made available in multiple languages.

New Inclusive Leadership Training: Designed to further drive and embed inclusive behaviours.

Employee surveys: Facilitating employee feedback on diversity, equity and inclusion, leadership performance, management impact and career and development opportunities.

Labour standards, wages and benefits

Defined remuneration strategy: Considers market rates of pay and aims to ensure consistency and equity in pay practices.

Gender equity remuneration: Analysis of pay data to identify gender pay gaps and requires senior managers globally to commit to the 'Gender Pay Equity Pledge'.

Benefits and allowances: At a minimum, statutory benefits and allowances for role and location.

Cost of living pressures: Adjustment of employee salaries by assessing inflation rates to address cost-of-living pressures.

Encouraging open dialogue: Openness in discussing rates of pay, performance, feedback, career paths and progression.

Freedom of association and collective bargaining

Participation in constructive dialogue and good-faith negotiations with freely elected union representatives.

Child labour

Recruitment Management Guidelines: Includes prohibiting the hiring of children before they complete their compulsory education and prohibiting them being engaged in roles that do not provide a healthy, safe and secure workplace.

Healthy, safe and secure workplace

HSE Program: The Health & Safety Policy outlines our commitment to our core value 'We are Safe' and includes HSE induction training and HSE Foundation Standard; tailored site-based employee communication and consultation; HSE audit program; PPI Scorecard tracking safety performance; and an online incident database.

Employee travel assistance: Providing 24/7 international emergency management assistance.

Modern slavery, forced labour, and human trafficking

Supply chain category review: For selected group entities, review of supply categories considered as having a higher potential for modern slavery practices.

Training: Raising awareness of modern slavery through compulsory annual Code of Conduct training, and targeted Modern Slavery Awareness training available to employees.

Supplier Code of Conduct: Outlining the standards of behaviour expected around respecting and upholding human rights, with general guidance information about modern slavery risks to boost supplier awareness.

Contractual protections: Contractual provisions relating to respecting and upholding human rights in ALS' standard terms and conditions for the supply of goods and services.

Communities

Local workforces: Significant investment and commitment to the development of local workforces.

Local suppliers: Use of local suppliers where possible to support host communities.

Indigenous Engagement Policy and action plan: Ensuring candidates identifying as indigenous have the opportunity to interview where key competencies and relevant qualifications are demonstrated.

Guidance and reporting

Standards and policies: Includes Code of Conduct, Human Rights Policy and Modern Slavery Statement.

Whistleblower Program: Includes Whistleblower Policy, ALS Business Integrity Helpline and the ALS Your Voice Helpline.

Public reporting

Sustainability Report: Annual summary of human rights-related commitments and efforts undertaken during the year.

Modern Slavery Statement: Annual Statement made for the purposes of the *Australian Modern Slavery Act 2018* (Cth) and the United Kingdom's *Modern Slavery Act 2015*.

Actions in our supply chains



Our suppliers are critical to our business. We seek to work with suppliers who align with our values, are committed to acting ethically, who respect the protection of human rights, and are committed to improving their environmental and social impact.

We take a collaborative approach to managing the risks of modern slavery in our supply chains. We support our contracted suppliers in the identification and remediation of these risks. We recognise that a key challenge of implementing our response to addressing modern slavery lies in assessing and addressing the risks in our supply chains, including those beyond our primary direct suppliers.

Our supplier assessment process focuses on gathering and reviewing relevant information about our suppliers. This helps us assess whether modern slavery practices appear to be present, or have the potential to arise, that would result in ALS causing, contributing to, or being directly linked to modern slavery practices associated with those supply arrangements. More specifically, our approach involves:

Employee training

Requiring all employees to undergo annual Code of Conduct training which includes content about human rights (including modern slavery) risks.

Detailed modern slavery awareness training is mandatory for all procurement and supply chain employees to support their supplier engagement and assessment activities.

Desktop research

Taking a risk-based approach to relevant focus areas, or as otherwise required.

This research may include reviewing key areas such as a supplier's code of conduct, corporate social responsibility policy, modern slavery statement, human rights policy or sustainability report.

Supplier engagement

Continuing to refine our supplier engagement approach by:

- Considering how suppliers respond to and address any potential adverse human rights impacts in their operations and supply chains
- Introducing an enhanced due diligence program including third-party supplier audits to be rolled out in FY26.

Supplier questionnaires

Continuing to refine the onboarding questionnaire process completed by suppliers and reviewing the breadth and depth of their responses relating to human rights and modern slavery.

Supplier Code of Conduct

Providing suppliers with the ALS Supplier Code of Conduct, including additional general guidance information about modern slavery risks and requesting their commitment to its requirements.

During FY25, the Supplier Code of Conduct was embedded into ALS' standard terms and conditions for the supply of goods and services.

Supplier agreements

Ensuring clauses about respecting human rights are included in ALS' standard terms and conditions for the supply of goods and services.

Any supplier reluctance to having these clauses included would be further investigated.

FY25 actions

In FY25, we worked to assess and address modern slavery risks in our operations and supply chains by continuing to refine and improve our strategy to identify, assess and address potential risks.

We worked collaboratively across procurement and supply chain, legal, governance, risk and compliance, sustainability, human resources and finance teams, remaining committed to strengthening our approach to modern slavery risk identification and management. This focused on four key pillars, including:



Targeted training and increasing awareness

- Collaboration and awareness across the business have grown, ensuring knowledge and learnings about modern slavery is shared. Efforts have focused on using our existing audit program to identify potential operational and supply chain issues, escalate them through appropriate channels within each business stream and functional pathways such as health and safety, human resources, procurement and compliance to ensure any potential findings are resolved appropriately.
- Building on the enhanced Code of Conduct training rolled out in FY24, we continue to provide refresher Modern Slavery Awareness training for relevant employees, including procurement and supply chain teams, corporate teams and all senior and executive leadership teams. These employees are required to complete this training at least every two years.
- The Modern Slavery Awareness training is also available to all other employees within the business who wish to undertake it.
- Continuing to provide independent, anonymous and confidential reporting through our Business Integrity Helpline and Your Voice Helpline.

Commencing our audit program

We launched a program with an independent, accredited third-party provider to conduct audits in our own operational facilities. In FY25, these audits were conducted in Mexico and India, countries we identified using the Walk Free Global Slavery Index 2023 - World map country prevalence data which indicates potential modern slavery and adverse human rights impacts.

- The audits provided operational assurance regarding the safeguarding of our employees, including providing fair and proper employment conditions that comply with all local labour laws relating to wages and labour standards, as well as assurance regarding the health and safety practices in place.
- This work has informed our ongoing efforts to assess modern slavery and human rights risks and will guide our future areas of focus.



Enhancing our engagement with suppliers

- Increased supplier engagement through both the procurement and supply chain teams and the sustainability team:
- This included discussions with our Tier one global suppliers with risk factors relating to industry type and the introduction of a program with an independent accredited third-party provider to conduct audits at their facilities that are scheduled for completion during FY26. This will give assurance that modern slavery risk indicators such as labour standards and health and safety practices are in place.
- Our enhanced and standardised supplier onboarding process continues to evolve with the commencement of greater improvements including increased expectations from our suppliers to meet our modern slavery standards. This will continue to be adopted through FY26. This includes:
 - A Supplier Code of Conduct including our 'Modern Slavery Guidance for Suppliers' to raise awareness of modern slavery risks and practices with our suppliers
 - Enhanced standard terms and conditions for the supply of goods and services, included in all purchase orders
 - A Supplier Onboarding Questionnaire with specific questions on suppliers' approach to addressing modern slavery.

Continuing our management compliance certification process

- This requires operational managers at each site to certify that site employees are aware of:
 - The risk of modern slavery and that they must not engage suppliers if there are concerns about potential modern slavery practices or human rights infringements
 - The requirement to report any suspected instances of modern slavery or human rights violations in our operations or supply chains to local management, the Chief Strategy Officer or the Group Sustainability Director.



Case study

Global supplier registration and management

ALS recognises that modern slavery exists in various forms across all countries and work environments. Operating in over 70 countries, we understand the importance of standardising supplier registration and management processes worldwide.

From FY25, our global Procurement-SCM and global ERP teams are implementing a unified system, supported by tools and procedures, to register and manage suppliers globally. This system will feature detailed questionnaires covering areas such as quality, sustainability, human rights and modern slavery.

The questionnaires will track suppliers' efforts in these areas and record any certifications they hold, such as ISO 9001, ISO 14001, ISO 14064, ISO 45001, OHSAS 18001. The tools will also help map the geographic footprint of ALS' suppliers and identify regions with elevated risk. Based on these assessments, ALS will evaluate supplier engagement on these critical topics and prioritise monitoring in high-risk areas. Understanding what suppliers are doing globally – and the mitigation procedures they have in place to manage their supply chains – is essential. As part of this commitment, ALS will provide supplier training and conduct follow-ups to ensure alignment with our standards. This new system will strengthen ALS' ongoing efforts by adopting a more proactive approach to addressing key issues related to sustainability, human rights and modern slavery.

Assessing the effectiveness of our actions

Evaluating the effectiveness of our response to managing modern slavery risks is key to refining how we identify and address any instances of modern slavery practices in our operations and supply chains.

We recognise that our global footprint and the complexity of our business makes it challenging to assess the effectiveness of our modern slavery risk management. Our strategy focuses on developing and implementing a robust effectiveness assessment program that incorporates qualitative and quantitative measures. This program will help identify areas for improvement and strengthen our approach to identifying instances of modern slavery.

Our effectiveness assessment for FY25 included:

- Undertaking a comparative analysis of our actions against those of our industry peers and various other ASX100 companies. Best-practice responses were examined to assess if they were relevant to integrate into our strategy.
- Continuing efforts to engage and collaborate with external stakeholders to understand their expectations and assess feedback about the Group's response.
- Understanding the percentage of employees who completed the Group's Code of Conduct training course, which includes specific content relating to our position on human rights.

→ Continuing to appraise the knowledge and understanding of our employees tasked with responding to modern slavery questionnaires and tender responses.

→ Considering responses to human rights and modern slavery-related questions in supplier onboarding documentation.

→ Assessing the effectiveness of our actions continued to include efforts undertaken in prior years, including:

- Interactions with our Board about the expectations of stakeholders, requirements and obligations of modern slavery legislation, and our policies and practices that support the implementation of our Human Rights Policy.
- Reporting annually to the Board's Sustainability & Innovation Committee on human rights (including modern slavery).
- Continuing to monitor the quantity and quality of supplier engagement with our onboarding process.
- Regular review and assessment of the effectiveness of our Code of Conduct, Supplier Code of Conduct, and associated policies, procedures and processes as part of our risk management framework.

- Analysing concerns raised, grievances received, and reports made under our Whistleblower Program relating to possible adverse human rights impacts, including modern slavery practices.

The efforts we undertook during the year to assess the effectiveness of our actions to combat modern slavery included:

- Continuing to make an independent whistleblowing hotline available to internal and external stakeholders, annual management compliance sign-offs and monthly compliance exception reporting by each of our senior site managers.
- Continuing to deliver our Code of Conduct training globally, reinforcing the shared responsibility of employees to help ensure we are not complicit in human rights abuses and to remain alert to signs of possible human rights abuses in our operations and supply chains.
- Continuing to make a detailed Modern Slavery Awareness training course available to all employees to self-enrol at any time.
- Continuing to distribute our Supplier Code of Conduct and ask suppliers to commit to the documented principles. This did not lead to the reporting of any instances of modern slavery practices taking place in our operations and supply chains.

Investigation and remediation

Our commitment to respecting and protecting human rights includes taking proactive steps to identify and remediate modern slavery practices and incidents that may occur in our operations and supply chains, especially if they directly link us to modern slavery practices or other practices causing harm.

Our whistleblowing hotlines, the ALS Business Integrity Helpline and ALS Your Voice Helpline, help identify and remediate modern slavery practices.

The hotlines enable our employees, our suppliers and their employees to report unethical, illegal, or improper practices (including modern slavery) safely and anonymously (if desired). All reports received via the hotlines are taken seriously and are handled in line with the ALS Whistleblower Policy and associated Investigations Procedure.

When a report is received, it is assessed and investigated. Any allegation of modern slavery, behaviour contrary to respecting the protection of human rights or sub-standard working conditions in our operations or supply chains would be investigated. Depending upon the nature and seriousness of a report, it may be referred to the relevant local authorities with the details of the allegations made.

After receiving a report, the following process is followed:

- 1 Record the report in the hotline platform if not received via the ALS Business Integrity Helpline or ALS Your Voice Helpline.
- 2 Acknowledge the report and engage with the reporter to the extent possible to keep them informed of the steps being taken to action the report.
- 3 Where warranted, refer the report to the relevant local authorities along with any details about the allegations made. This determination would be made once the details provided are considered, and the seriousness of the allegations assessed.
- 4 Maintain the privacy and confidentiality of the reporter unless requested by the reporter to do otherwise.
- 5 Protect the reporter from reprisal to the fullest extent possible.
- 6 Depending on whether the matter is referred to the relevant local authorities, investigate the allegations made. The investigation may be undertaken by an external provider or by an authorised person within the Group, impartially and objectively.

Where an allegation has substance, we are committed to acting in the best interests of those impacted. We would seek to work with the supplier to develop and implement a plan to reduce the harm caused to those affected and to improve practices to eliminate the issue. Supplier relationships would typically be terminated only after reasonable attempts to improve practices have been made, if a supplier fails to adhere to our Supplier Code of Conduct, or continues to engage in modern slavery practices.

If modern slavery practices in our supply chains were identified by a member of the public or media reports, we would follow the investigative steps previously outlined, before engaging with the supplier to address the concerns reported.

While no incidents of modern slavery practices were identified or reported in FY25, our Helplines will continue to be available and accessible to our employees, and our suppliers and their employees.

Our poster containing information about how to contact the ALS Business Integrity and ALS Your Voice Helplines is required to be displayed on employee noticeboards at each of our 420+ locations



Our FY26 focus

We remain committed to continuously improving our modern slavery program and the actions we take to identify and manage these risks across our operations and supply chains. Ethical and responsible behaviour will continue to be central to our business approach.

In FY26, we will build on these efforts by enhancing and refining the Group's approach to manage modern slavery risks in our operations and supply chains. While some initiatives may extend over multiple reporting periods, our priorities for the year ahead include:

Governance

- Further develop the audit program launched in FY25 by:
 - Conducting additional audits within our operations in selected countries based on the Walk Free Global Slavery Index 2023 World Map country prevalence data, which highlights potential modern slavery and adverse human rights impacts
 - Completing audits of Tier 1 global suppliers with risk factors related to geography and industry type, aiming to complete three responsible sourcing audits of selected suppliers.

These audits will be aimed at providing us with:

- Operational assurance regarding:
 - Our operations safeguarding our employees, including providing fair and proper employment conditions that comply with all applicable local labour laws relating to wages and labour standards
 - The integrity of our annual operational manager certification process, including confirming certifications indicating they are not aware of any instances of human rights violations of our employees or other individuals, and that ALS is not complicit in any form of modern slavery practices.
- Assurance regarding the labour standards and health and safety practices implemented by the selected Tier 1 global suppliers.
- Continuing cross-functional collaboration to support the ongoing regional centralisation of our procurement and supply chain management. This includes continuing work to consolidate our knowledge of higher-risk supplier data across our Group to better understand the risk profile of our supply chains across these categories.
- Encourage any employees attending supplier sites to use the ALS Human Rights Supplier Site Visitor Checklist.
- Continue to implement our enhanced and standardised supplier onboarding process and documentation, including supplier questionnaires and due diligence processes.

- Ongoing development of our modern slavery program, taking into account any new legislation and changes to existing legislation that affect any of our global locations.

Awareness and capabilities

- Provide refresher Modern Slavery Awareness training for relevant procurement and supply chain employees, with those employees required to re-complete this training every two years.
- Expand the coverage of our detailed Modern Slavery Awareness training across the business to increase awareness and knowledge.

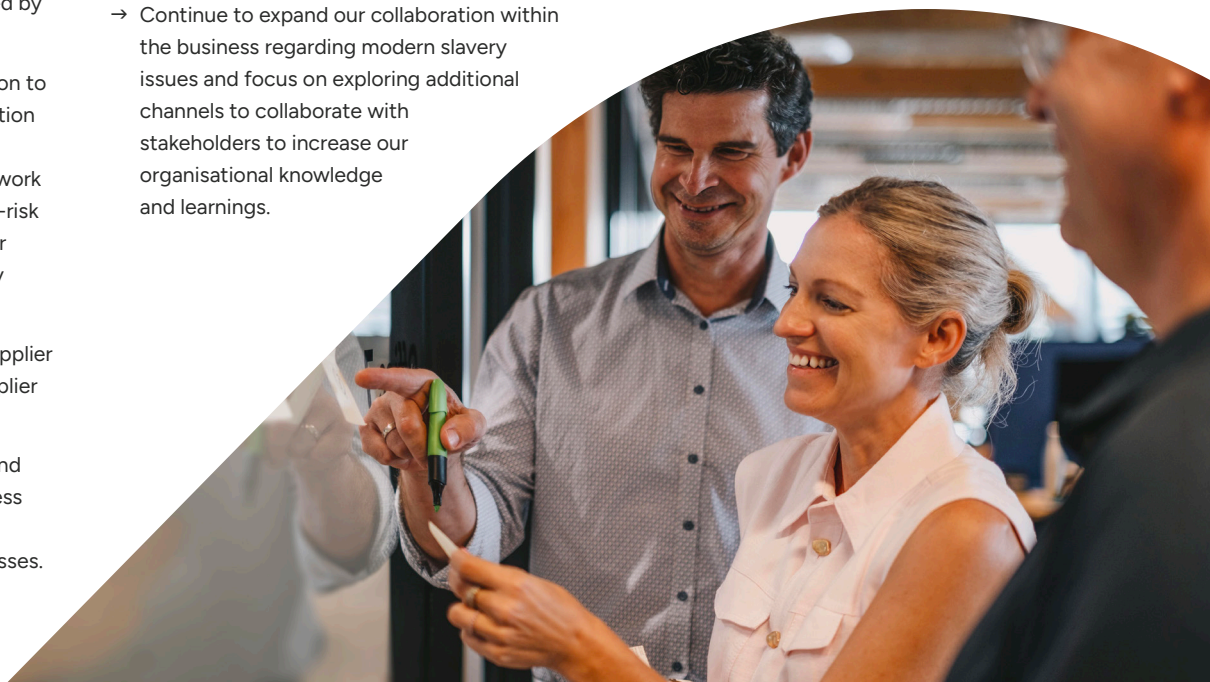
Collaboration

- Continue to expand our collaboration within the business regarding modern slavery issues and focus on exploring additional channels to collaborate with stakeholders to increase our organisational knowledge and learnings.

- Maintain dialogue with leading service providers to further develop our audit program and the use of third-party audits in our operations and supply chain.

Supplier engagement

- Continue to incorporate, evolve and refine the Group's expectations of our suppliers to identify and address modern slavery in our supplier onboarding process, our Supplier Code of Conduct and our standard terms and conditions for the supply of goods and services.





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