

Bradken Pty Limited | ACN 108 693 009

# Bradken modern slavery statement

Financial Year 2025: 1 April 2025 to 31 March 2026

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## CEO's foreword

### Bradken Modern Slavery Statement – Financial Year 2025

I am pleased to present Bradken's sixth Modern Slavery Statement, prepared to meet our obligations in Australia and Canada and, more importantly, to demonstrate the standards we expect across our global value chain.

As we begin delivery of our next three year strategy, BK28, we are sharpening how we create value through operating a responsible and sustainable value chain. This means further embedding human rights to everyday decisions, setting clearer expectations of our suppliers and partners, and lifting transparency across our operations and supply chain.

Over the past year we refreshed our human rights and modern slavery risk assessment to inform BK28 Sustainability Strategy priorities. Guided by stakeholder materiality, customer alignment and evolving regulatory expectations on value chain transparency (including Scope 3 emissions, modern slavery, circularity and sanctions), we now have a clearer view of where risks may emerge and how they might evolve. That work is translating into practical actions: calibrating due diligence by category and region, strengthening supplier onboarding, targeting capability building for those with the greatest influence on outcomes, and clarifying escalation pathways, all enabled by better data and appropriate technology.

Global supply chains are complex and dynamic, but our direction is clear. We are deepening partnerships with suppliers and customers, improving the resilience and reliability of our supply chain, and using better data to identify and address risks earlier and more effectively. By elevating Bradken circularity and product lifecycle thinking: from design and procurement through to operations and recovery, we are building towards the transparency, traceability and responsible sourcing that our customers and communities rightly expect.

We are moving from counting activities to measuring outcomes. We will assess effectiveness through clearer KPIs that balance preventative controls (policy and contracting coverage), detective controls (risk screening, supplier assessments and worker voice access) and outcome measures (timely corrective actions, verified remediation and reduced recurrence). We will review progress through established governance forums and report openly on what is working and where we need to improve.

Guided by Our Values of Challenge, Customer, Communication, we will continue to raise the bar on governance and disclosure. This is not easy work. It can be confronting. But the standards we set, and the choices we make with our partners, have real impacts on people. That responsibility is fundamental to who we are and to the future we intend to help build.



**Sean Winstone**  
Chief Executive Officer, Bradken Pty Limited



# 1. Our structure, operations and supply chains

## Reporting entity and structure

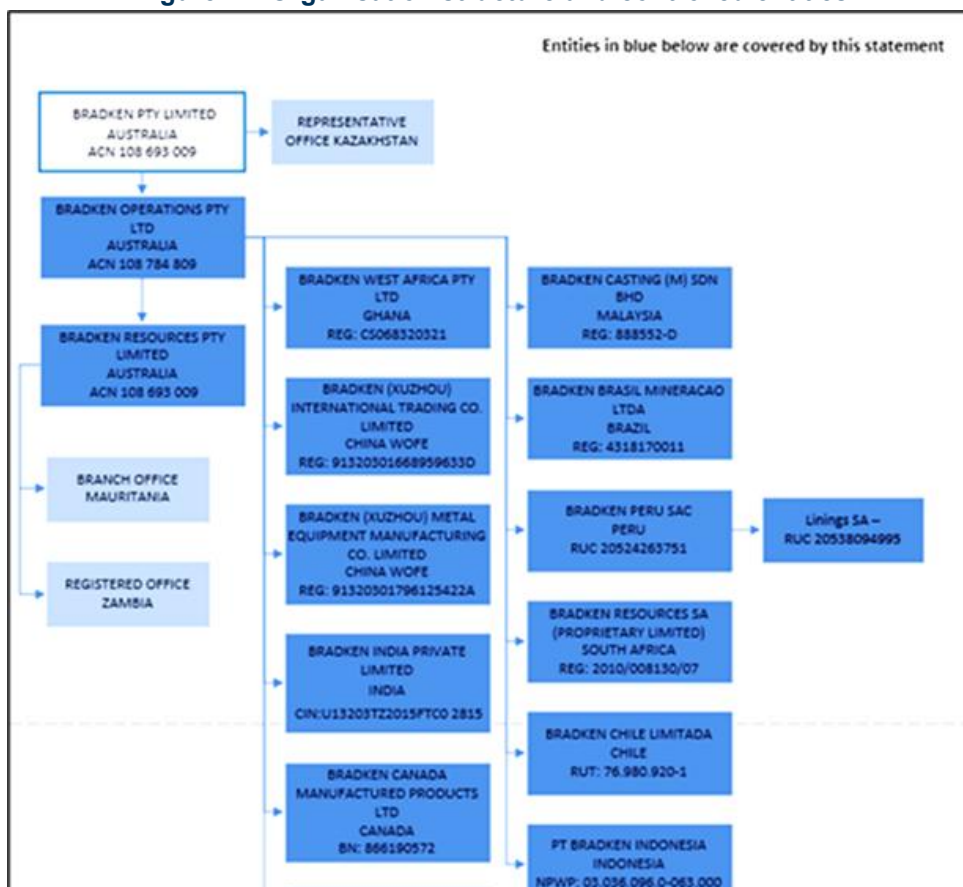
This statement is made by Bradken Pty Limited (ACN 108 693 009), an Australian proprietary company and a wholly owned subsidiary of Hitachi Construction Machinery.

Bradken operates under the Japanese financial year, with the current reporting period from 1 April 2025 to 31 March 2026 (FY2025). References to “Bradken”, “we”, “us”, or “our” refer to Bradken Pty Limited and its wholly owned subsidiaries.

Bradken is a global manufacturing and services business headquartered in Newcastle, Australia. While Bradken Pty Limited’s subsidiaries are separate legal entities, they operate collectively under an integrated global operating model referred to internally as “One Bradken”.

Bradken is governed through a matrix management structure with a single Executive Leadership Team and centralised corporate and operational functions. These shared functions provide oversight, governance, and support across the group and include but not limited to corporate services, finance, technology, operations, supply chain and procurement, human resources, governance and risk (including legal), safety, sustainability, quality, and sales. Group wide policies, standards, and procedures are established at a corporate level and apply consistently across all Bradken entities and operations.

**Figure 1 – Organisation structure and controlled entities**



## Corporate Information

Bradken is a globally established manufacturer and supplier of innovative wear solutions for the mining and resources sector, with a heritage spanning more than 100 years. Headquartered in Australia and founded in 1920s, the company has grown from its origins as a steel foundry in Australia into a multinational organisation with operations across Australia, Canada, Peru, India, Malaysia and China. Today, Bradken forms part of the Hitachi Construction Machinery group (HCM) headquartered in Japan and listed on the Tokyo Stock Exchange, supporting customers operating in some of the world's most significant mining regions. Bradken being part of the Hitachi Construction Machinery group means Bradken aligns closely with HCM's sustainability approach, governance and focus.

Bradken's business model centres on the design, manufacture and supply of wear products that enhance the safety, productivity and efficiency of mineral extraction and processing. Bradken provides highly engineered wear solutions, including mill liners, ground engaging tools, crawler systems, and an expanding suite of digital wear monitoring technologies used across mobile plant, fixed plant and mineral processing operations. With more than a century of experience in alloy development, foundry operations and specialised fabrication, the company integrates advanced tooling, robotics, machining and engineering practices to deliver high performance solutions to global mining customers.

Bradken's operations are underpinned by a diverse international workforce of around 3,100 people including contractors and a strong technical services capability embedded within major mining regions. Teams work closely with customers to address complex wear challenges across the value chain, improving equipment life, reducing downtime and contributing to more efficient production outcomes. This customer partnership model, supported by infield service teams, remains a key competitive strength. In addition to its mining focus, Bradken maintains a long standing role as a trusted supplier of transport related castings and consumables to the Australian sugar cane milling sector.

Bradken also continues to invest in technology enabled solutions that enhance equipment performance and reduce lifecycle impacts. Digital wear monitoring, advanced sensor technologies and data driven maintenance tools allow customers to optimise production planning and reduce waste, reinforcing the company's value proposition in an increasingly efficiency focused mining environment.

Across markets, demand for Bradken's products is influenced by global commodity trends, equipment utilisation rates and customers' capital and maintenance strategies. The company's diversified international presence, long standing customer relationships and strong engineering capability position it to navigate cyclical industry conditions. Ongoing capital investment including modernisation of foundry assets and expansion into high-growth regions supports Bradken's ability to deliver long-term value for its owners.

### Locations

As outlined in the figure below, Bradken has foundry and engineering facilities in Australia, Canada, India, China, Peru, and Malaysia. Our corporate headquarters are in Newcastle, Australia. We also have smaller, non-production related sales offices in various regions to stay close to our customers.

Figure 2 – Bradken’s production global footprint



## Our people

Bradken prioritises the health, safety and wellbeing of its people across all global operations. At the peak of the reporting year, Bradken employed 3,100 people at its peak worldwide, with most of its workforce located in Australia and India. The workforce comprised approximately 50.4% waged employees, 41.6% salaried employees and 8.0% contractors.

The overall gender composition of the workforce at the time of reporting was 78% male, 12% female, 2% non-binary and 8% non-disclosed. Bradken continues to maintain a strategic focus on increasing female participation across the organisation. This is evidenced by the company’s newest foundry in Peru, which is nearing completion and has achieved a workforce composition of 30% female through targeted and intentional actions to improve gender balance.

Bradken’s FY25 Human Rights Risk Review, with a specific focus on forced labour risks, identified an opportunity to further strengthen the identification and support of potentially at-risk worker categories, particularly in jurisdictions with a higher reliance on waged and contract labour. In response, during FY26 Bradken will continue to refine workforce category definitions and enhance workforce data quality. These actions are intended to enable more robust risk assessment and support the implementation of targeted mitigation measures. This work will be complemented by the commencement of third-party audits across key operations in Asia, as outlined further in this Statement.

## How we support health, safety and wellbeing

Health, wellbeing and safety are priorities to Bradken, included in our Human Rights Policies. Our core programs have evolved in 2025 to capture the increasing requirements and value of psychosocial safety; these programs include:

- **Rules We Live By:** Addressing critical safety risks.
- **Monthly Team Safe Discussions:** Engaging all employees in safety conversations.
- **Inclusion and Diversity Program:** Promoting a diverse and inclusive workplace.
- **Employee Engagement Survey:** Gathering feedback to improve employee satisfaction.
- **Employee Assistance Program:** Providing support for mental and physical wellbeing.
- **Whistleblower via EthicsPoint:** a confidential, independent whistleblower (Compliance Reporting) program via NAVEX EthicsPoint, available 24/7 online and by phone for employees, contractors and other stakeholders to report concerns.
- **Mental Health First Aiders (MHFA)** across multiple sites, and psychosocial hazard assessments to inform site level action plans.

Our Code of Conduct reinforces expectations and behaviours across Bradken and the Hitachi Construction Machinery Group, reflecting the Kenkijin Spirit values that shape how we collaborate and lead.

### Inclusion, diversity and engagement

We aim to create a safe, inclusive and engaging workplace where every person is valued, heard and respected. Our Inclusion & Diversity program (guided by Our Values of Customer, Challenge and Communication) continues to build capability, reduce barriers and expand flexible work. Bradken has focus on its commitment to women in Science, Technology, Engineering and Maths and holds multiple external partnerships such as:

- **National Association of Women in Operations (NAWO), Australia** - NAWO is Australia's leading network for women in operations, focused on advancing gender balance through professional development, advocacy, and industry collaboration
- **Women In Mining (WIM), Peru** – WIM Peru to increase women's employment and visibility within mining and energy industries.
- **STEAM Girls Moquegua, Peru** – An educational initiative developed in partnership with Anglo American Quellaveco, Bradken, and City Makers, an UNESCO award-winning organization, aimed at addressing the gender gap in science-related fields.
- **HunterWISE, Australia** – a University of Newcastle initiative that encourages girls in the Hunter region to pursue STEM through school outreach, mentorship, and industry engagement.
- **Purthri, Coimbatore, India**- Project Purthri in Coimbatore empowers underprivileged girls aged 13 to 18 with life skills, mentorship, and career guidance to build career intentionality and pursue future STEM opportunities.
- **Women in Manufacturing in Chilca, Peru** – a clear pathway for more women to enter the foundry world, building skills in safety and operations.

### Human rights governance

In 2025, Bradken introduced a Human Rights Policy that aligns with internationally recognised standards (including the UNGPs and ILO principles) and embeds risk based due diligence, stakeholder engagement and access to remedy across our operations and value chain.

For full list of related policies and governance of potential risk of modern slavery and forced labour, please refer to Section 2.

## Our supply chain

Consistent with the UN Guiding Principles on Business and Human Rights, our objective is that we do not cause, contribute to, or be directly linked to modern slavery through our operations and business relationships.

During the reporting period, Bradken engaged 4103 active suppliers globally in FY25, a reduction of over 6% from the preceding year. Over the year we continued to rationalise our vendor base, consolidating spend under Supplier Agreements, strengthening strategic relationships, and deactivating dormant suppliers to improve transparency, leverage due diligence coverage and enhance ongoing performance monitoring.

Our spend profile informs our risk based focus areas. During the reporting period, most third party spend related to four major taxonomies outlined below.

**Figure 4 –Summary - main products and services purchased**

Category	Products/Services
<b>Components</b>	Forging and castings, steel plate, steel bars, bolts, pins, ceramic tiles, and machining services and outsourcing services that go into producing finished castings
<b>Scrap and Alloys</b>	Various metals (either produced from raw materials or sourced from scrap materials) that are used in the melting process to manufacture our castings
<b>Consumables</b>	Catalysts and binders, ceramic shapes, sands, graphite electrodes, grinding media, welding materials, paints and washers; refractories, thermocouples and timber that are used as part of the process of manufacturing castings
<b>Business Goods &amp; Services</b>	Equipment rental, printing and stationery, travel and entertainment, personal protective equipment, testing services, cleaning and gardening, clothing (uniforms), computer software and hardware and temporary personnel services

The balance covered logistics, repairs and maintenance, utilities and capital expenditure.

**Figure 5 – Spend breakdown by category**

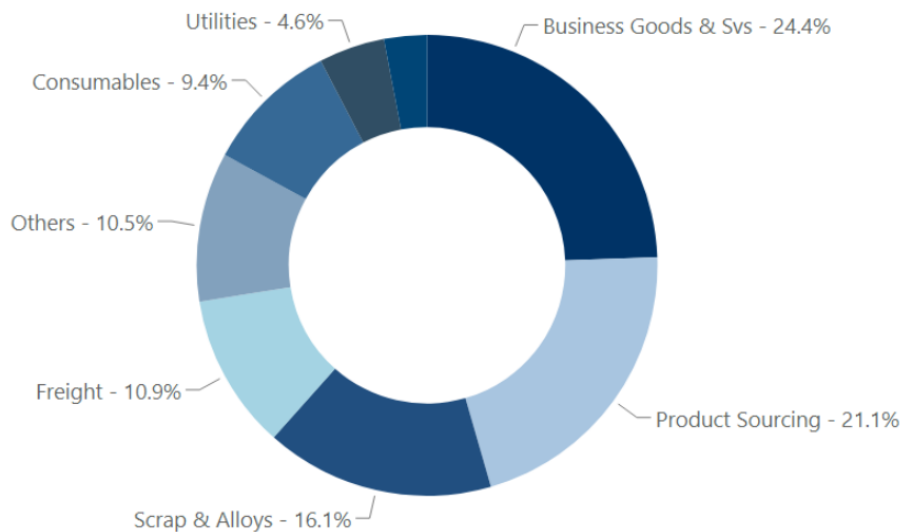
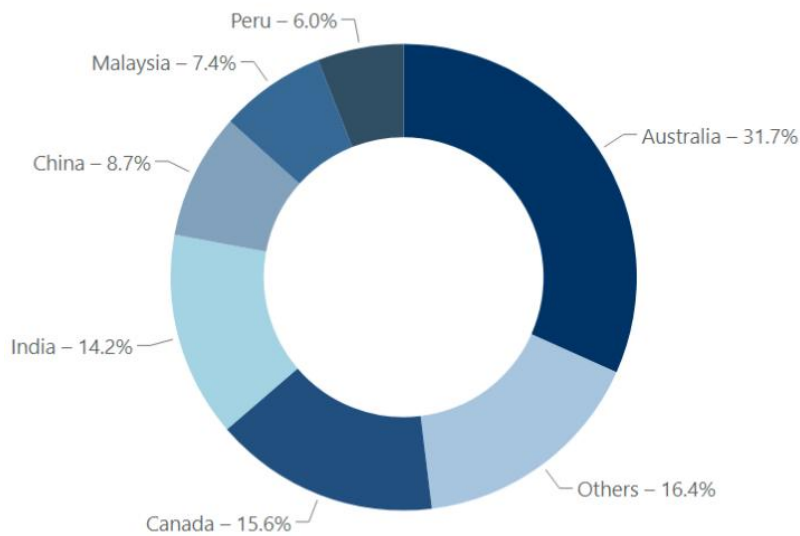


Figure 6 indicates the summary of Bradken’s suppliers at tier 1 level location by country.

**Figure 6 – Supplier locations globally**



### **Modern slavery risks and geographical risk considerations**

Bradken acknowledges Mauritania's high vulnerability to modern slavery (Global Slavery Index 2023). We maintain a branch office there to support a key customer, with one salaried employee protected by our global policies. As there is no facility or supply chain in Mauritania, the risk of modern slavery is considered low. If the branch office expands, we will implement further due diligence based on local risk factors.

Bradken does not operate or have Tier 1 suppliers in countries with the highest prevalence of modern slavery (North Korea, Eritrea, Saudi Arabia, Türkiye, Tajikistan, UAE, Russia, Afghanistan, and Kuwait).

We recognise that suppliers further down our supply chain may be connected to these countries and modern slavery risks exist in other developed countries as well. Our efforts are to continually improve our systems and governance to minimise exposure whilst enhancing our value chain transparency both upstream and downstream.

## **2) Governance, policies and accountability**

### **Governance and oversight**

Bradken's Board holds ultimate accountability for human rights and modern slavery. Oversight is provided through the Audit Risk and Compliance Committee and management sustainability governance forums, which review risks, controls and performance and escalate material matters. Bradken also participates in Hitachi Construction Machinery group forums to align with group human rights expectations.

### **Policies and standards**

Bradken's approach is underpinned by group wide policies applicable to all personnel, subsidiaries and operations and managed through the Bradken Documented Information System. These include the Code of Conduct, Supplier Code of Conduct, Human Rights Policy, Responsible Sourcing Standard, Modern Slavery

Response Policy, Whistleblowing and Grievance Policy, and Responsible Minerals and Metals Policy. Together, these instruments establish ethical standards, labour and health and safety expectations, risk based due diligence, supplier controls and victim centred remediation. Policies are provided to suppliers during onboarding through the Bradken Supply Hub, with acknowledgement required, and selected documents are publicly available.

### Roles, risk management and escalation

The Board sets risk appetite and approves this statement. Management is responsible for implementation and resourcing, with the Sustainability and ESG function stewarding the program and embedding controls within the risk management framework. Procurement, Human Resources, Governance and Risk and operational leaders and functions support risk identification, due diligence, ethical recruitment, grievance handling and escalation. Risks exceeding Bradken’s threshold are managed through documented treatment plans, with executive oversight and activity pause where severity warrants. Risk registers are reviewed annually and upon material change.

### Engagement, grievances and remediation

Bradken engages with suppliers, customers, industry bodies and civil society to strengthen risk identification, worker voice and remediation, particularly in higher risk categories and geographies. Confidential speak up channels are available to employees, contractors and third parties without retaliation. Supplier related cases follow a structured escalation and remediation process, with outcomes monitored and reported to management and the Board. No modern slavery incidents were reported through the whistleblower program during the reporting period.

### Program maturity and improvement

Over recent years, Bradken has strengthened its approach through supply chain risk mapping, enhanced due diligence and formal integration of modern slavery controls into enterprise risk management. During this reporting period, a dedicated Sustainability and ESG function was established as was the establishment of the BK28 Sustainability Strategy. Future priorities include deeper focus on higher risk areas, stronger contractual and monitoring controls, expanded capability across teams and suppliers, and improved transparency of outcomes.

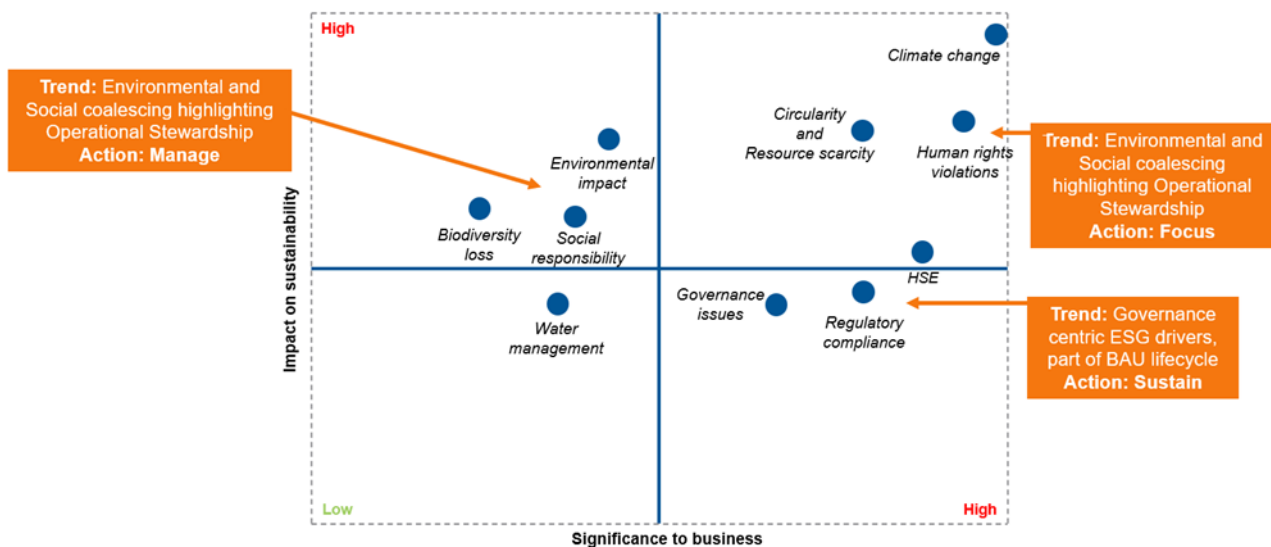
**Table: 1 – Snapshot of Bradken’s modern slavery evolution to date**

2019 –2020	2020 –2021	2021 – 2022	2022 –2023	2023 –2024	2025
Bradken pledges to prioritise understanding modern slavery, consider risks, and protect human rights in their supply chain	Bradken commits to risk considerations and continuous improvement across their global footprint	Bradken reviews operations to address human rights and protect worker welfare, aiming to prevent modern slavery in their supply chain.	Bradken intensified its commitment to managing modern slavery risks, emphasising growth impacts and broadening supplier discussions	Bradken integrates experts to enhance controls and understand risks, integrating modern slavery into decision-making and training	Bradken’s materiality assessment and Human Rights Risk Review inform governance, strategy and policy. Forced labour is embedded in the Corporate Risk Register, and the BK28 Sustainability Strategy includes a Responsible and Sustainable Value Chain pillar to support future growth.

## FY2025 Advancing our approach to forced labour risk management highlights

In FY2025, Bradken continued to strengthen its approach to modern slavery and forced labour through coordinated action across materiality, risk management, strategy, policy and capability development. A sustainability materiality assessment confirmed Human Rights including modern slavery as a core priority, alongside Climate and Bradken Circularity, and these priorities now underpin the BK28 Sustainability Strategy.

**Figure 7 – Materiality assessment results focus BK28 Sustainability Strategy**



As part of this continuous improvement approach, Bradken completed a focused Human Rights Risk Review to assess potential forced labour exposure across its operations and value chain. Three direct human rights risks were identified, with the most material escalated to the Corporate Risk Register for enterprise level oversight. The review strengthened Bradken’s understanding of risk drivers and informed enhanced risk based due diligence, clearer ownership of controls and prioritisation of mitigation in higher exposure regions and activities, supported where appropriate by selective third party audits. Key outcomes were integrated into the BK28 Sustainability Strategy to drive multi year improvement in governance, data quality, processes and upstream and downstream collaboration.

During the reporting period, Bradken also updated its modern slavery and human rights policies to clarify responsibilities, align terminology globally and reinforce minimum standards for labour rights, supplier conduct and escalation. These updates support consistent implementation across the value chain and reflect evolving regulatory and stakeholder expectations.

Capability building remains a focus area. Bradken refreshed its ESG Learning and Development framework to strengthen understanding of modern slavery, human rights, climate, Bradken Circularity and responsible sourcing. Updated training modules are planned for rollout in FY2026 across operational, commercial and supply chain teams to improve awareness of emerging risks, regulatory obligations and individual responsibilities in maintaining a responsible and sustainable value chain.

The BK28 Sustainability Strategy provides a structured three year framework to manage risk and support future growth through three interconnected pillars Responsible and Sustainable Value Chain, Operational

Stewardship and Product Stewardship. The strategy prioritises strong foundations in governance, data, processes and collaboration to address modern slavery and other shared value chain risks.

**Figure 8 - Bradken’s three pillars of sustainability for BK28 Sustainability Strategy – key focus areas**



Figure 9 summarises the BK28 Sustainability Strategy, outlining its purpose, approach and priority initiatives, and highlights longer term strategic aspirations toward 2031 (BK31) and beyond.

**Figure 9 - Bradken’s long term sustainability aspirations**

<b>Our purpose</b>	Equipping the resource sector to sustainably advance society and deliver an optimised future		
<b>Our ESG approach</b>	Reducing Bradken’s environmental impact through a targeted sustainability strategy that drives decarbonisation, advances circularity, builds responsible value chains, and addresses modern slavery through ethical and transparent practices.		
<b>BK28 ESG initiatives</b>	Responsible and sustainable value chain	Operational stewardship	Product stewardship
<b>Long term targeted outcomes</b>	Align to Tier 1 customers responsible & sustainable supply chain objectives	Scope 1&2 GHG emissions reduction against 2018 baseline*	Select product groups are proven sustainable and or circular
<b>Long term Strategic aspiration</b>	Traceable and transparent value chain	Carbon neutral operations with zero waste and harm (human rights)	Certified, circular, and sustainable product range

### 3) Risk identification and assessment

Bradken identifies and assesses modern slavery and forced labour risks using a risk based and evidence led approach. The approach is informed by the UN Guiding Principles on Business and Human Rights, ILO forced labour indicators and the OECD due diligence framework and supports consistent disclosure and value chain engagement with customers and suppliers.

Country and sector risks are prioritised by combining external indicators with Bradken’s operational footprint and product and service risk profile. Bradken references the Walk Free Global Slavery Index to inform country level exposure and applies proportionate controls based on risk. Higher exposure risks are concentrated in parts of Asia and South East Asia, particularly in outsourced manufacturing and labour intensive inputs. In Australia and Canada, where overall prevalence is lower, Bradken focuses on targeted checks in higher risk services such as logistics and labour hire. Mauritania currently presents low risk due to limited presence, with enhanced due diligence to apply if the footprint expands.

Risk identification, assessment and escalation follow an OECD aligned due diligence model. Controls include supplier screening and questionnaires supported by secondary source checks, mandatory acceptance of the Supplier Code of Conduct during onboarding, and targeted audits and site visits in higher risk contexts.

Strengthened gatekeeping is applied in higher risk categories to ensure supplier awards are not made on cost or capability alone.

Bradken maintains confidential grievance and worker voice mechanisms with non retaliation protections and victim centred remediation, including reimbursement of recruitment fees where identified. Role based training supports procurement and site leaders, with findings tracked to closure and oversight provided through the corporate risk management process.

During the reporting period, Bradken assessed 689 suppliers through questionnaires and completed 23 supplier site visits and assessments. Salient risk areas included outsourced manufacturing, agency labour, cleaning services, refractories and chemicals, timber, rubber and small volumes of tungsten. Elevated risks identified in parts of Asia included recruitment fees and debt, document retention and excessive working hours, which are addressed through contractual requirements, labour provider due diligence, wage and hours verification, accommodation standards and rapid remediation.

Bradken does not place Tier 1 suppliers in countries assessed as having the highest prevalence of modern slavery. Risks in deeper tiers are recognised and addressed through the BK28 Sustainability Strategy and the FY2025 Human Rights Risk Review, with a focus on continuous improvement and collaboration across the value chain.

See [Section 7](#) on future program focus and step changes.

## 4) Due diligence and actions taken

In FY2025, Bradken strengthened its due diligence and controls to prevent, identify and address forced and child labour risks across its operations and Tier 1 supply chain.

### Supplier standards, screening and contracting

Supplier standards and contractual controls were reviewed and enhanced to reinforce human rights expectations, including flow down requirements, audit and cooperation rights and remediation obligations. Supplier onboarding continued through the Bradken Supply Hub, requiring acknowledgment of the Supplier Code of Conduct. Risk based screening and periodic reassessment were completed using CENTRL questionnaires, supported by secondary research and review, with actions tracked through Bradken's risk and incident management systems.

During the reporting period, 689 supplier questionnaires were assessed, representing approximately 16 per cent of net suppliers. No material modern slavery issues were identified, although continuous improvement opportunities were incorporated into supplier engagement and uplift activities.

### Verification, engagement and remediation

Bradken applies a proportionate verification model combining desktop reviews and targeted site assessments in higher risk contexts. Verification focuses on recruitment practices, worker paid fees, document retention, wages and working hours, accommodation where provided and access to grievance mechanisms. Where gaps

are identified, corrective actions are implemented with clear ownership, milestones and re verification, and material issues are escalated.

Bradken maintains confidential grievance and speak up channels for employees and supply chain workers, with non retaliation protections and victim centred remediation. Remedies may include reimbursement of unlawful fees, restoration of wages, return of documents and support for safe continued employment or exit. No modern slavery matters were reported through the EthicsPoint program during FY2025.

### **Effectiveness and continuous improvement**

Based on due diligence activities, site visits, internal reviews and grievance inputs, Bradken did not identify modern slavery in its operations or Tier 1 supply base during the reporting period. Bradken recognises inherent limitations in supply chain transparency and continues to enhance controls, verification and oversight in line with regulatory, customer and stakeholder expectations.

### **Looking ahead**

See **Section 7** on future program focus and step changes.

## **5) Training and capacity building**

Bradken builds capability where it has the greatest leverage, focusing on procurement, site and operations leaders and roles responsible for supplier engagement and risk management. Oversight is supported through the Bradken Sustainability Committee, which provides regular updates on modern slavery risks and regulatory developments.

In FY2025, Bradken refreshed its ESG Learning and Development framework, covering modern slavery, human rights, climate, Bradken Circularity and responsible sourcing. Updated training modules will be rolled out in FY2026 across operational, commercial and supply chain teams to strengthen awareness of risk indicators, due diligence and escalation requirements. Leadership commitment was reinforced through the CEO announcement of Bradken's updated Human Rights Policy.

Training is delivered through mandatory e learning and targeted workshops. All employee training is available in multiple languages, with a 99 per cent completion rate. Targeted sessions for procurement and operations focus on identifying forced labour indicators and applying Bradken's risk based due diligence processes.

Supplier capability is supported through onboarding requirements and targeted engagement. Suppliers must acknowledge the Supplier Code of Conduct during onboarding, and higher risk categories are prioritised for capability building under the FY2026 Sustainability Uplift Roadmap. Training and engagement activities are integrated with supplier and customer due diligence processes, reinforcing shared responsibility to prevent and address modern slavery risks across the value chain.

### **Case examples**

**Sourcing workshop:** The Sourcing Team and Sustainability & ESG teams aligned on outsourcing-related risks, country considerations and BK28 Sustainability Strategy priorities within the Responsible & Sustainable Value Chain pillar.

**Customer collaboration (the Americas):** A major mining customer's sustainability query evolved into a collaboration pathway spanning circularity, responsible value chains and Scope 3 including sharing of external advisory to support and involvement to support the customers capability uplift via subject matter expert led

working groups. A time of writing engagement continues to explore responsible and sustainable value chain collaboration works together.

## 6) Assessing effectiveness

### Governance and effectiveness—FY2025 conclusion

Effectiveness metrics were reviewed by governance bodies during the year and informed by the materiality assessment and the Human Rights Risk Review. Actions were recorded in the Corporate Risk Register with remediation plans reflected in forward actions. In FY2025, no credible or material modern-slavery issues required management intervention, and the current control set was assessed as fit-for-purpose for Bradken's risk profile as BK25 closes. We acknowledge inherent limits beyond Tier 1 visibility and will continue strengthening downstream transparency in line with regulatory guidance and our strategy.

### FY2026—Continuous improvement: measuring effectiveness

Bradken is working towards implementing a more defined modern-slavery measurement framework/KPIs to:

1. track outcomes against strategic aspirations; and
2. drive continuous improvement by identifying emerging challenges.

The framework and KPIs will reflect Our Values (Challenge, Customer, Communication) and will: (i) focus on direct-risk areas where Bradken has greatest influence; (ii) use comparable, outcome oriented indicators; (iii) integrate governance, data and learning; and (iv) enable consistent, cross jurisdiction impact and disclosure.

## 7) Forward commitments (FY2026 and beyond)

Guided by BK28 Sustainability Strategy, the FY25 Human Rights Risk Review, and HCM's Kenkijin Spirit (Our Values), we will focus on direct-risk categories and geographies where our influence is greatest, including:

- **Risk focus:** Prioritise outsourced manufacturing and core operations in Asia under the Responsible and Sustainable Value Chain and Operational Stewardship initiatives.
- **Worker voice:** Maintain EthicsPoint, on site engagement and psychosocial safety pathways, informed by findings from third party audits.
- **Capability building:** Deliver the FY2026 Sustainability Capability Roadmap, including forced labour training for internal teams and risk based supplier uplift, supported by learning KPIs.
- **Independent assurance:** Increase third party audits over the mid term, commencing with annual operational audits in India and implementation of an outsourcing audit plan, with remediation tracked to closure.
- **Supplier data and transparency:** Enhance supplier master data to strengthen due diligence, Scope 3 reporting, compliance and visibility beyond Tier 1, aligned with Product Stewardship.
- **Risk review remediation:** Track Human Rights Risk Review actions through MYOSH, with annual review of policies, contracts and supplier tools.
- **Governance and oversight:** Monitor progress through Bradken governance forums and disclosures.
- **Ongoing alignment:** Review and adapt the program to align with parent company commitments and emerging regulatory requirements, including EU CSRD developments.

## 8) Consultation with entities we own or control

Bradken operates as One Bradken under centre led functions, applying common policies, systems and processes across operated sites and regions. Sustainability & ESG, Human Resources, HSE, Quality, Governance and Risk, Operations, Sales and Procurement jointly coordinate the modern slavery program and reporting with regional offices and operations. This Statement is a joint disclosure for Australia and Canada reporting requirements, prepared within Bradken's annual reporting cycle.

### Consultation across reporting entities

In developing this Statement, Bradken coordinated inputs from reporting entities in scope of the Australian MSA and Canada's S-211, including owned or controlled entities. Functional leads (Sustainability & ESG, Procurement/Supply Chain, Quality, HSE, Legal, Governance & Risk, Human Resources, Sales) reviewed risk insights, due-diligence results and remediation steps to ensure a consistent, group-wide approach.

### Preparation, review and approval

Drafting drew on Bradken policies and standards (including Supplier Code of Conduct), due-diligence outputs (questionnaires, desktop checks, site visits), grievance data (EthicsPoint) and category strategies. A cross-functional review was completed and considered by the Bradken Sustainability Committee and Export Control Committee, both of which provide executive oversight of modern-slavery actions and effectiveness. The Statement was then approved in accordance with Bradken governance requirements and published in line with Australian and Canadian obligations, including principal governing body approval and responsible-member signature (Australia), and governing-body approval with attestation and website publication (Canada).

## Appendix 1

### Attestation

This statement has been made with approval of Bradken's Board of Directors and is endorsed on their behalf by Sean Winstone in his role as Chief Executive Officer of Bradken.

In accordance with the requirements of the *Modern Slavery Act 2018* (Australia) and the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada), I attest that I have reviewed the information contained in the report for the entity or entities listed above.

Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Sean Winstone  
**Chief Executive Officer, Bradken Pty Limited**

**5 May 2026**

I have the authority to bind 'Bradken Pty Limited'.

## Appendix 2

### How we have addressed reporting criteria

The table below sets out where in this Statement we have addressed the recommended reporting criteria under the mandatory reporting criteria under the *Modern Slavery Act 2018* (Australia) and the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada).

Section	Australia – Mandatory Criteria	Canada – Mandatory Topics
<b>1 &amp; 2 Structure, operations, supply chains, governance and policies</b>	Structure; operations; supply chains	Structure; activities; supply chains
<b>3. Risks</b>	Risks of modern slavery in operations and supply chains	Forced/child labour risks in activities and supply chains
<b>4. Actions &amp; due diligence</b>	Actions including due diligence and remediation; how addressed	Policies; due diligence; measures to remediate forced/child labour; measures to remediate loss of income to vulnerable families
<b>6. Effectiveness</b>	How effectiveness is assessed	How effectiveness is assessed
<b>5 &amp; 7. Training/commitments</b>	Good practice within actions	Training provided to employees
<b>8. Consultation</b>	Consultation with entities owned/controlled	Included but not required.

