

# JOINT MODERN SLAVERY STATEMENT

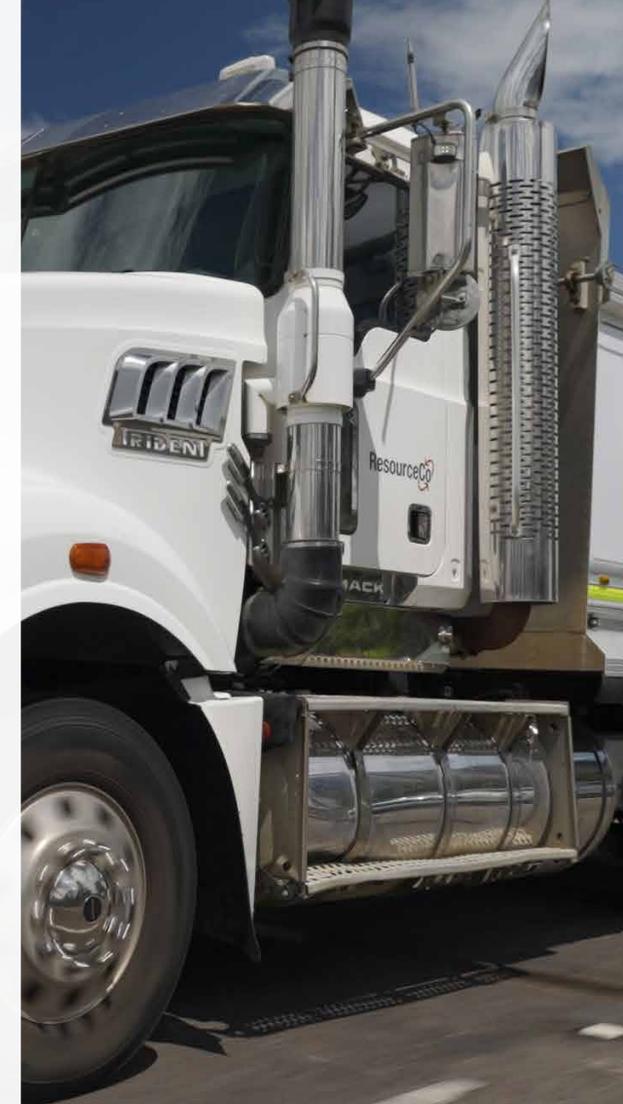
FINANCIAL YEAR 2025

ResourceCo



# Contents

MANDATORY CRITERIA	PAGES
<p><b>CRITERIA 1 - Identify the reporting entity</b></p> <ul style="list-style-type: none"> <li>The Reporting Entities</li> <li>About us</li> <li>Our vision and values</li> <li>Message from Managing Director</li> <li>Highlights</li> </ul>	3 - 6
<p><b>CRITERIA 2 - Describe the reporting entity's structure, operations and supply chains</b></p> <ul style="list-style-type: none"> <li>Our Structures</li> <li>Our Operations</li> <li>Our Supply Chains</li> </ul>	7 - 12
<p><b>CRITERIA 3 - Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls</b></p> <ul style="list-style-type: none"> <li>UN Guiding Principles</li> <li>Risk Matrix</li> <li>Operational Modern Slavery Risks</li> <li>Geographical Risks</li> <li>Supply Chain Modern Slavery Risks</li> </ul>	13 - 17
<p><b>CRITERIA 4 - Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes</b></p> <ul style="list-style-type: none"> <li>Due Diligence Framework</li> <li>Supply Chain Tracing Process</li> <li>Supplier Training Modules</li> <li>Governance, Policies &amp; Procedures</li> </ul>	18 - 23
<p><b>CRITERIA 5 - Describe how the reporting entity assesses the effectiveness of these actions</b></p>	24
<p><b>CRITERIA 6 - Describe the process of consultation on development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered in the statement)</b></p>	25 - 26
<p><b>CRITERIA 7 - Any other information that the reporting entity, or the entity giving the statement, considers relevant</b></p>	27



## ACKNOWLEDGMENT OF COUNTRY

ResourceCo acknowledges the Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of the lands on which we work and live. We pay our respects to their cultures, Elders past and present and honour their continuing connection to land, waters and community.

# Criteria 1

## Identify the reporting entity

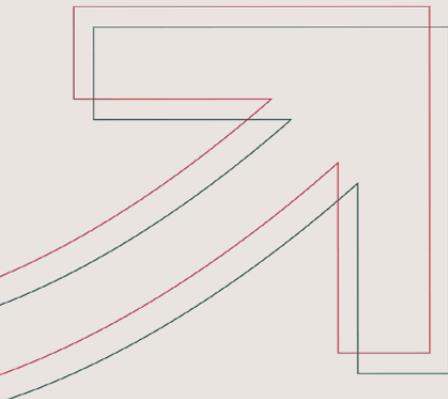
### THE REPORTING ENTITIES

ResourceCo Holdings Pty Ltd ACN 107 343 288 ("**ResourceCo**") has prepared this joint modern slavery statement pursuant to the *Modern Slavery Act 2018* (Cth) ("**Act**") for the FY25 reporting period on behalf of itself and the following subsidiary reporting entities:

- Tyrecycle Pty Ltd ACN 085 545 053 ("**Tyrecycle**"); and
- ResourceCo Material Solutions Pty Ltd ACN 608 316 687 ("**Soil Reuse and Recycling**").

This modern slavery statement has been prepared on a consolidated basis and includes all other entities owned and / or controlled by ResourceCo as "included entities", collectively referred to as "**ResourceCo**", "**Reporting Entities**", "**we**", "**our**", "**us**".

In this modern slavery statement, we outline what the Reporting Entities have done to identify, address and mitigate modern slavery risks within our operations and supply chains.



## ABOUT US

Since 1992, ResourceCo has led the way in resource recovery, with operations spanning Australia and Southeast Asia. While others are only now recognising the value of circularity, we've spent decades building the systems, partnerships, and expertise needed to repurpose materials once seen as waste. Our customer and supplier base are broad and longstanding, including entities of all sizes across a range of sectors. We work with government agencies, local communities, small businesses and large multinational corporations. These customers, whether they are in the public or private sector, rely on our operations to meet their specific resource recovery needs, ensuring that material traditionally perceived as waste is repurposed and given a new life.

Our operations have long supported the transition to a circular economy and emissions reductions throughout our customers' supply chains. With more organisations becoming aware of, and being required to report on, the greenhouse gas emissions associated with their operations and supply chains, we are seeing increasing demand for our services which utilise waste otherwise destined for landfill and create alternative, lower carbon products.

Respecting and upholding human rights have always been integral to how we conduct our business. It's embedded in the way we deliver value – not only for our customers and suppliers, but for our people and the broader community.

## OUR VISION AND VALUES

ResourceCo operates in alignment with four (4) core values.

These foundational principles help us to achieve our vision of leading the way in resource recovery, developing and using innovative technologies to transform waste into usable products.



### SUSTAINABLE

We are in the business of resource recovery, transforming waste into usable products. Our focus is on preserving the planet's limited resources for current and future generations.



### COMMITTED

We are dedicated to consistently delivering on our brand promise and going the extra mile to ensure we leave a positive legacy.



### CREATIVE

Creativity is embedded in the actions of our executives, employees and business partners. We continuously challenge our operations to drive progress towards a circular economy.



### AGILE

We are dynamic and responsive, acting with speed and agility to provide innovative solutions for our customers and stakeholders.



# Message from the Managing Director



**Our commitment to a circular economy is driven by innovation, agility, and deep collaboration across our supply chains**



At ResourceCo, we remain driven by innovation and a practical approach to creating sustainable solutions. Our dedication to advancing the circular economy is supported through strong supplier relationships that emphasise resource recovery, reuse, and repurposing. Through close collaboration across our supply chains, we extend the life of valuable materials, reduce landfill dependency, and contribute to shared progress toward a more sustainable future.

This year marks our sixth Modern Slavery Statement, with ResourceCo Material Solutions and Tyrecycle continuing as reporting entities. This statement demonstrates our sustained commitment to uncovering potential risks, taking action when issues arise, and embedding strong governance to protect people from exploitation across every level of our business.

As demand for our services continues to grow, so too does the size and diversity of our supply chain — making robust systems to identify and address risks more critical than ever. This growth demonstrates how ResourceCo's solutions are increasingly aligned with global efforts to reduce emissions and waste. Our products are designed to keep valuable materials out of landfill and give them new life, helping to build a circular economy that benefits everyone.

We know that real change starts with awareness. Over the past 12 months, we've taken important steps forward to further strengthen our modern slavery compliance framework and ensure we're equipped to act when it matters most.

Through targeted training and awareness initiatives across ResourceCo, we are helping our people and stakeholders understand how modern slavery risks can arise within supply chains — and the vital role each of us plays in preventing them.

With proposed changes to the Modern Slavery Act on the horizon, we're already working with specialist advisors to prepare for the future. Our goal is to stay ahead, adapt quickly, and continue improving our practices.

ResourceCo remains committed to continuous improvement — driving ethical sourcing, protecting human rights, and building a better future for people and the planet.

**Simon Brown**  
Managing Director, ResourceCo



## FY25 HIGHLIGHTS

During the FY25 reporting period, ResourceCo achieved the following milestones:



Implemented a **risk based due diligence threshold** to direct our due diligence efforts towards high risk suppliers.



Updated the **industry classification** list on the Supplier Portal to ensure that the industry risk classification is aligned against the most recent risk datasets.



**510 risk matrix assessments** were conducted on new suppliers and **risk screenings** were conducted on **2,265 suppliers** across ESG risk areas.



Issued **53 modern slavery questionnaires** in accordance with ResourceCo's due diligence threshold.



As a result of refining the supply chain tracing tools developed in FY24, we issued **2 targeted supply chain tracing** exercises to increase transparency beyond our Direct suppliers (Tier 1) and gained insight into **10 Indirect suppliers (Tier 2)**.



Developed and rolled out a **Modern Slavery Remediation Procedure** for our Modern Slavery Remediation Team. This Procedure guides how we address non-compliances and heightened risks of modern slavery identified through due diligence efforts.

# Criteria 2

Describe the reporting entity's structure, operations and supply chains

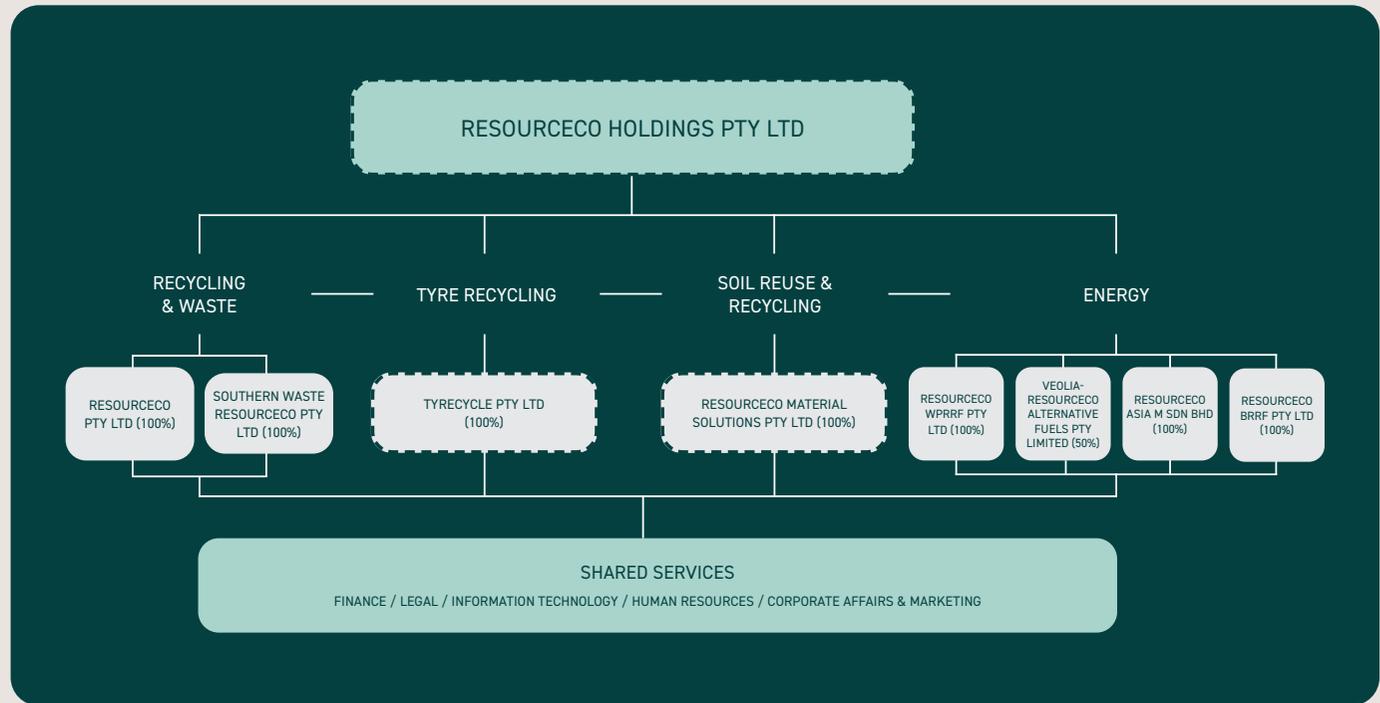
## OUR STRUCTURE

ResourceCo Holdings Pty Ltd is the parent company for the ResourceCo Group of entities, providing centralised oversight over group operations. Whilst the corporate structure includes a number of wholly owned subsidiaries, ResourceCo's core operations are conducted predominantly through four main divisions: *Recycling & Waste, Tyre Recycling, Soil Reuse & Recycling, and Energy.*

During this reporting period, ResourceCo acquired the remaining shares in Cleanaway ResourceCo RRF Pty Ltd, now known as ResourceCo WPRRF Pty Ltd ("**ResourceCo WPRRF**") with that entity becoming a wholly owned subsidiary within the ResourceCo Group. Given ResourceCo previously had a controlling interest in ResourceCo WPRRF and reported on this entity as an included entity for its modern slavery statement, this acquisition has not resulted in any material changes to how we report on these operations for the purposes of our obligations under the Act.

ResourceCo also participates in a joint venture within the alternative fuels sector which forms part of our Energy division through the joint venture entity Veolia-ResourceCo Alternative Fuels Pty Limited. This entity is not part of ResourceCo's consolidated group and, as such, is captured within Veolia's modern slavery statement.

ResourceCo is headquartered at 162 Fullarton Road, Rose Park, Adelaide and employs a dedicated workforce of over 500 direct employees across Australia and Southeast Asia.



## OUR OPERATIONS

ResourceCo's four operational divisions span the commercial and demolition waste, tyres, resource recovery, soils, alternative fuels and energy sectors and are each supported by an integrated Shared Services function. Each of these divisions contribute to driving the circular economy by transforming a range of waste materials into valuable resources.

ResourceCo operates 29 resource recovery facilities across Australia, with operations in Victoria, New South Wales, Western Australia, Queensland, South Australia and Tasmania. ResourceCo also has a presence in Southeast Asia with an alternative fuel facility in Ipoh, Malaysia.

A description of the activities undertaken by each major operational division within ResourceCo is outlined below. ResourceCo's subsidiaries which are Reporting Entities in this period are addressed first.



### TYRE RECYCLING

Tyrecycle is a large national tyre recycling network with operations across South Australia, Western Australia, New South Wales, Victoria, Queensland and Tasmania.

In late 2024, Tyrecycle opened Australia's first dedicated off-the-road ("OTR") mining tyre recycling facility in Port Hedland, Western Australia. This new facility has the capacity to process over 30,000 tonnes of OTR mining tyres annually, providing an efficient mine-to-processing service, and enhancing sustainability credentials for operators in one of the world's busiest mining regions. Also in 2024, Tyrecycle commenced operations at a "purpose built" tyre recycling facility at East Rockingham in Western Australia.

During this reporting period, Tyrecycle collected more than 18.5 million tyres, producing 127,712 tonnes of tyre derived fuel ("TDF") and 20,164 tonnes of rubber crumb for supply in domestic and Southeast Asian markets.

The repurposed materials from these recycled tyres are used in the following applications:

- Rubber crumb is used as a recycled-content input in the construction of roads and soft-fall surfaces.
- TDF is used as an alternative fuels substitute in cement kilns and boilers.

### SOIL REUSE AND RECYCLING

Soil Reuse and Recycling operate a network of sites often co-located with other ResourceCo operations, along with a number of land rehabilitation project sites, providing an integrated service offering for soil material across South Australia, Victoria and New South Wales. During this reporting period, Soil Reuse and Recycling expanded into Queensland with our first ResourceCo branded truck servicing the market.

Providing services to construction and redevelopment projects local to each of its sites, the major activities undertaken by this operational division include the following:

- Transport and supply of reusable structural soil materials for development.
- Transport and supply of reusable fill soils for site rehabilitation.
- Treatment of contaminated soils.
- Screening, sorting, and recycling of mixed fill soils.

Using its in-house material exchange software to identify real-time project needs, Soil Reuse and Recycling optimises reuse opportunities across the structural soils market through transport and supply of reusable structural soils. The software provides customers with material assessment records and real-time traceability of material movements.

A major project undertaken by the Soil Reuse and Recycling division involved partnering with Enduroturf to deliver works at Suncorp Stadium in Brisbane. As part of this project our contractors transported and reused sandy soil, disposed of old concrete for recycling and resupplied recycled concrete road base for the new works.



## RECYCLING AND WASTE

ResourceCo operates a network of construction and demolition waste recycling facilities across South Australia and Victoria, with all of these sites achieving Green Star certification. This certification demonstrates our commitment to sustainability and responsible resource use, which complements our broader supplier and labour-risk management framework.

In FY25, our recycling facilities repurposed over 1.4 million tonnes of construction and demolition waste into recycled aggregate, which was supplied back into the local construction market to support circular economy outcomes. This commitment to sustainable materials has been demonstrated through key projects, including our collaboration with McMahon's on the new Adelaide Crows Headquarters in South Australia, where recycled aggregates were used in construction.

Another notable innovation is the trial use of ResourceCo's recycled glass sand as pipe bedding in South Australian infrastructure projects, aimed at increasing the uptake of recycled materials in civil construction.

ResourceCo has also developed Environmental Product Declarations ("EPDs") for a number of its recycled aggregate products, which provide independently verified, quantified data on the environmental impacts associated with the products throughout the life cycle. EPDs provide visibility to ResourceCo's downstream customers about the sourcing of raw materials and inputs, contributing to greater transparency in the supply chain. This is particularly important for our downstream customers with the introduction of mandatory climate reporting as at 1 January 2025, which requires reporting entities to have visibility over, and reporting on, the greenhouse gas emissions impacts of their value chains.

## ENERGY

ResourceCo operates alternative fuels processing facilities located in New South Wales and Malaysia. In this reporting period, we expanded our capability with the opening of a new \$70 million facility in Hemmant, Queensland. This site is the first of its kind in the region and has the capacity to process up to 250,000 tonnes of local waste each year that would otherwise be sent to landfill.

Across these facilities, light construction and demolition waste as well as commercial and industrial waste streams are received from a diverse range of partners, including local councils, skip bin operators and event waste contractors. These materials are sorted, recovered and transformed into Process Engineered Fuel ("PEF"), a lower carbon alternative to traditional fossil fuels, and used by high intensity energy users such as cement manufacturers. In addition to these facilities, ResourceCo is also the joint venture partner of an alternative fuels processing facility in South Australia, operated by Veolia-ResourceCo Alternative Fuels Pty Ltd.

## RESOURCECO ASIA

In addition to its domestic alternative fuels facility in Australia, ResourceCo operates a resource recovery facility in Ipoh, Malaysia. This facility provides an important waste management outlet for the region, achieving a 97% diversion rate for incoming materials in FY25.

Similarly to our Australian energy operations, our Ipoh facility processes non-municipal and textile waste streams, converting them into PEF for use in cement kilns. With a production capacity of approximately 50,000 tonnes of PEF per annum, the facility supports regional efforts to reduce landfill reliance and carbon emissions.

Through ResourceCo Asia, the business extends its circular economy model internationally, while maintaining oversight of its offshore operations to ensure that waste processing and labour practices align with ResourceCo's ethical sourcing standards.

## SHARED SERVICES

The Shared Services function provides strategic direction and support to all operating entities of ResourceCo. This includes finance, legal, information technology, human resources and the corporate affairs and marketing functions.

Having a Shared Services function ensures consistency, transparency and coordination across the business, enabling ResourceCo to deliver on stakeholder expectations with a positive impact on environmental, social and economic outcomes.

Each Shared Services function also plays a role in supporting ResourceCo's modern slavery compliance obligations:

- **Finance** – oversees supplier payments and financial controls, helping to identify and prevent transactions with unverified or high-risk suppliers.
- **Legal** – provides governance over contractual terms, supplier agreements and compliance frameworks to ensure alignment with the Act and ResourceCo's internal policies and procedures.
- **Information Technology (IT)** – supports integration between internal systems and the externally managed supplier portal, ensuring secure and efficient data management.
- **Human Resources (HR)** – upholds fair labour practices within ResourceCo's direct workforce, ensuring policies and training reinforce ethical employment standards across ResourceCo.
- **Corporate Affairs and Marketing** – drives transparent communication with stakeholders and supports external reporting requirements.

Together, these functions underpin ResourceCo's governance framework, ensuring that modern slavery risks are identified, managed and monitored consistently across the Group.

### SUPPLY CHAINS

FY25	FY24
SUPPLIERS <b>2,265</b>	SUPPLIERS <b>2,259</b>
INTERNATIONAL SUPPLIERS <b>1%</b>	INTERNATIONAL SUPPLIERS <b>1%</b>
AUSTRALIAN SUPPLIERS <b>99%</b>	AUSTRALIAN SUPPLIERS <b>99%</b>

During this reporting period, our total number of suppliers remained consistent with the previous year. This reflects ResourceCo's deliberate approach to maintaining a stable and transparent supplier base, which supports effective oversight of modern slavery risks. By focusing on strengthening existing supplier relationships and embedding due diligence processes across our procurement activities, we have enhanced visibility and accountability within our supply chains. Maintaining a steady supplier profile also contributes to business continuity and operational stability.

Currently, 99% of our suppliers are based in Australia, with a small percentage of international suppliers from countries such as Chile, France, Germany, India, Italy, New Zealand, Singapore, Sweden and Vietnam. This distribution enables ResourceCo to maintain strong local engagement while carefully managing any risks associated with international sourcing.

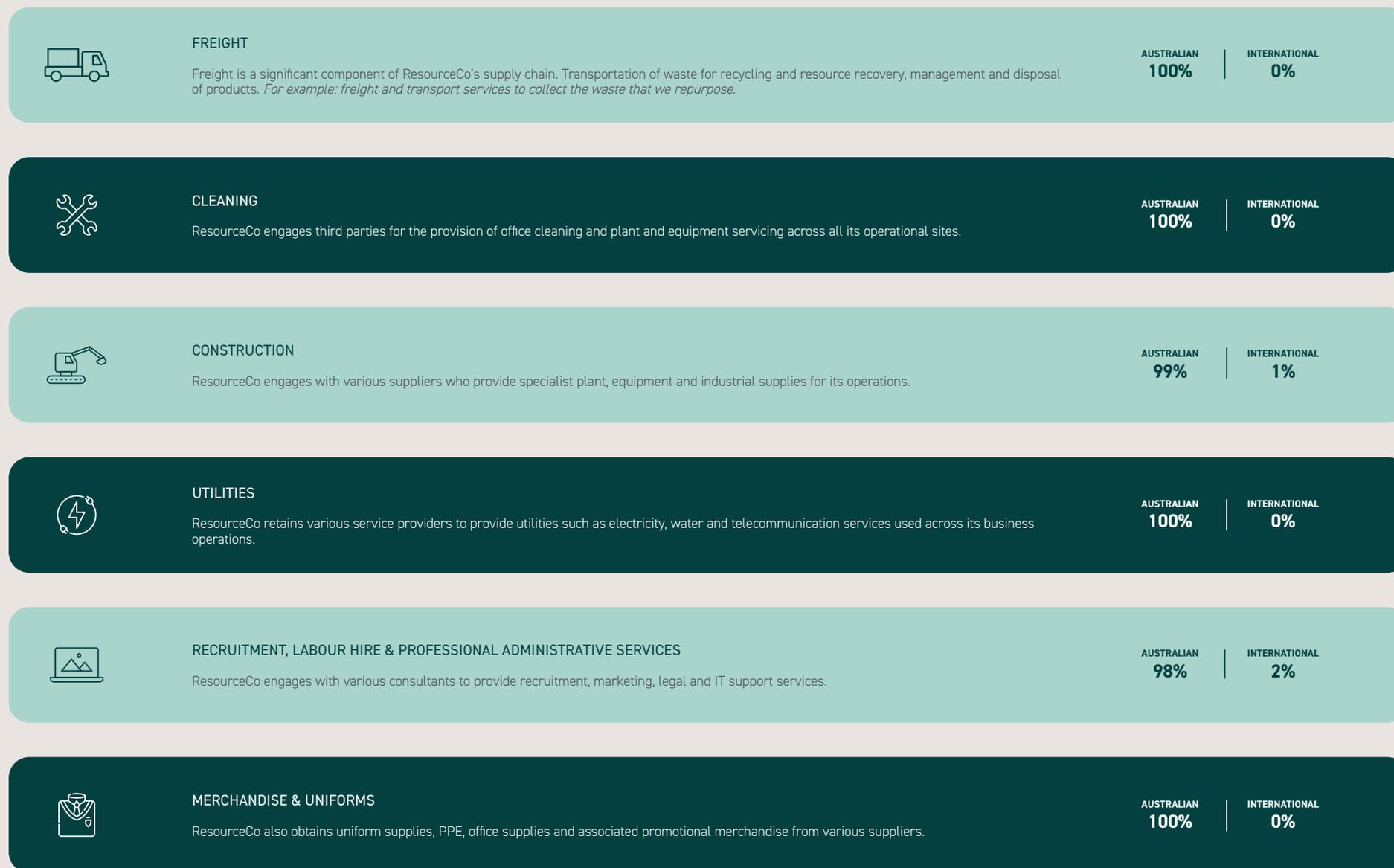
### DIRECT SUPPLIER<sup>1</sup> (TIER 1) OPERATING LOCATIONS

COUNTRY	%
AUSTRALIA	99.45%
CHILE	0.10%
SINGAPORE	0.10%
FRANCE	0.05%
GERMANY	0.05%
INDIA	0.05%
ITALY	0.05%
NEW ZEALAND	0.05%
SWEDEN	0.05%
VIETNAM	0.05%

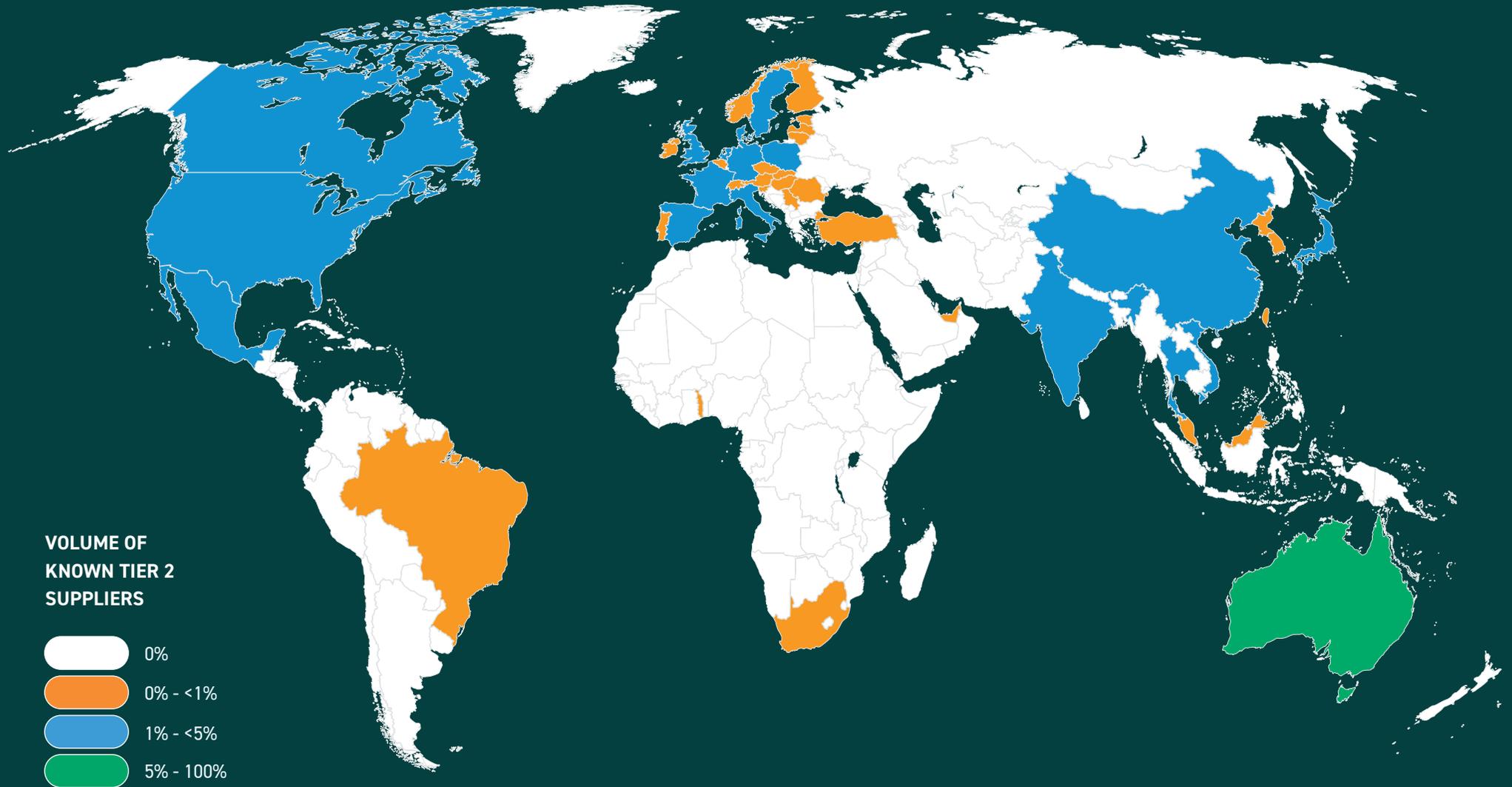
<sup>1</sup> "Direct suppliers" are otherwise referred to as "Tier 1 suppliers" and are the suppliers that ResourceCo engages directly and has contractual relationships with.



Our key supply chains fall within the following categories:



## INDIRECT SUPPLIERS<sup>2</sup> - TIER 2



<sup>2</sup>Indirect suppliers are the suppliers within ResourceCo's supply chains beyond its direct / Tier 1 suppliers. This includes the suppliers engaged by ResourceCo's direct suppliers (ResourceCo's Tier 2 suppliers) and all other suppliers within these supply chains right down to raw materials suppliers.

ResourceCo has continued to look deeper into its supply chains. Most of our Tier 2 suppliers are based in Australia. However, this map shows that our supply chains become increasingly globalised as we delve deeper into our supply chains.

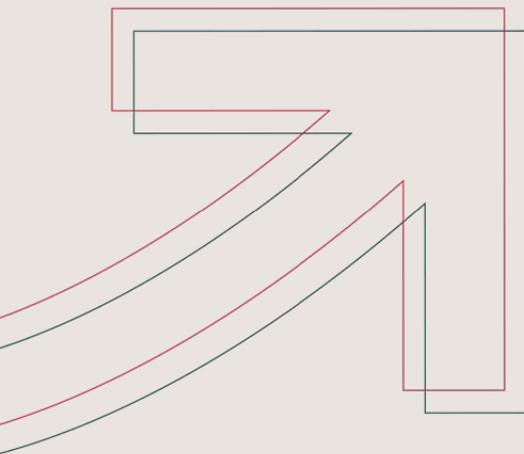
# Criteria 3

*Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls*

Identifying modern slavery risks can be complex given the international reach and layered nature of supply chains.

During this reporting period, ResourceCo enhanced its modern slavery compliance framework with a stronger risk-based focus, prioritising continuous improvement and maturity through risk assessments, supplier and media screening and regulatory considerations.

In addition, ResourceCo's Modern Slavery Remediation Team plays a key role in supporting this framework by overseeing investigations, coordinating responses, and facilitating remediation where modern slavery risks or incidents are identified.



## THE UN GUIDING PRINCIPLES

ResourceCo conducts its modern slavery risk assessments in accordance with the UN Guiding Principles (“**UNGP’s**”) and the “cause, contribute to and directly linked to” framework.

### Cause

Modern slavery caused directly by the entity itself through its actions or omissions.

*For example, when an entity employs children in its factory.*

### Contribute to

Activities and / or omissions by an entity that facilitate or enable modern slavery.

*For example, engaging a supplier and imposing restrictive lead times that lead to forced labour and child employment to meet these deadlines.*

### Directly linked to

Being connected to harm through products, services or business relationships.

*For example, engaging a supplier and it later discovering through due diligence that this supplier employs children.*

## RISK MATRIX

ResourceCo's risk matrix considers key factors when assessing the modern slavery risk associated with its operations and supply chains.



### Geographical Factors

Higher-risk countries and / or regions within those countries.



### Product and services factors

Specific products and services known to have heightened modern slavery risks.



### Sector and industry factors

Particular industries and sectors with elevated modern slavery risks.



### Entity factors

Specific entities known for higher modern slavery risk, often due to broader Environmental, Social and Governance (ESG) non-compliances.

The risk matrix incorporates data from sources including the Walk Free Foundation's Global Slavery Index, Corruptions Perceptions Index, ILAB data (goods produced by child and forced labour), the NSW Anti-Slavery Commissioner's Procurement Risk Management Framework and the US Department of Labour – List of Goods of Produced by Child Labour and Forced Labour.

Suppliers are assessed against this risk matrix as part of ResourceCo's ongoing due diligence processes, which are outlined further in Criteria 4 below.



### RISK FACTORS

Considering the key risk factors outlined above, ResourceCo identifies its modern slavery risks to be concentrated within the following areas of its operations and supply chains:

#### OPERATIONS

- Industry risks
- Operational expansion risks
- Geographical risks

#### SUPPLY CHAINS

- Geographical risks
- Product and services risks
- Sector and industry risks
- Entity risks

A description of each of these risks within ResourceCo is set out in the following.

## OPERATIONAL MODERN SLAVERY RISKS

### OVERVIEW OF GENERAL WASTE SECTOR RISKS



Globally, the waste management sector is recognised as an industry with heightened modern slavery risks, particularly due to the prevalence of migrant workers who are more vulnerable to exploitation, the use of labour hire and the presence of dangerous working conditions.<sup>4</sup>

Whilst regulated, the waste management industry in Australia still involves the use of heavy machinery and the undertaking of manual handling activities, along with socio-economic conditions that may affect parts of the workforce. Accordingly these factors contribute to the sector having an exposure to modern slavery.

### OPERATIONAL EXPANSION RISKS

ResourceCo’s workforce model remains stable, with labour hire levels consistent even as the business continues to grow and diversify. The company maintains a strong focus on directly employing its people wherever possible, supporting greater oversight and alignment with its ethical employment standards.

Employee welfare remains a key priority. Working conditions are continuously monitored – particularly in high-risk environments – and proactive programs have been introduced to support psychological safety and wellbeing, reflecting growing awareness and commitment across the business.

## GEOGRAPHIC RISKS

ResourceCo operates all but one of its sites within Australia. Australia is considered a low-risk country for modern slavery risk and is ranked as having the strongest government response, and the lowest vulnerability to, modern slavery risk in the Asia Pacific region.<sup>5</sup>

Outside of its Australian operations, ResourceCo is responsible for the direct operational control of its resource recovery facility located in Ipoh, Malaysia. As outlined in the table below, the modern slavery prevalence and vulnerability ratings of Malaysia are significantly higher than Australia. Some contributing risk factors to these heightened ratings include a lack of regulation, historical government corruption, large migrant worker populations and the prevalence of poverty.

ResourceCo recognises the inherent modern slavery risks associated with its operations in Malaysia and manages these through a strong governance framework that includes clear accountability at both the executive and site-management levels. Oversight is supported by reporting to the Risk Committee, integration of modern slavery considerations into procurement and contractor engagement processes, and the use of periodic site audits—conducted routinely and whenever significant operational changes occur. There were no material changes to operations or ResourceCo’s Asian operating environment in FY25, and therefore, the company’s modern slavery risk profile in Malaysia remained consistent with the prior year.

COUNTRY	PREVALENCE RATING <sup>5</sup>	VULNERABILITY RATING <sup>5</sup>
AUSTRALIA	1.6 / 1000 PEOPLE	7 / 100
MALAYSIA	6.3 / 1000 PEOPLE	37 / 100

<sup>4</sup>In particular, countries such as the UK have identified instances of human trafficking in the waste and recycling industry (<https://www.mrw.co.uk/news/three-convicted-in-modern-slavery-case-28-06-2021/>).

<sup>5</sup>In accordance with the Walk Free Foundation’s Global Slavery Index 2023.

## SUPPLY CHAIN MODERN SLAVERY RISKS

### DIRECT SUPPLIERS (TIER 1)

Over 99% of ResourceCo's direct suppliers (tier 1) are located in Australia, contributing to a relatively low modern slavery risk profile.

However, given the diverse nature of its operations, ResourceCo's supply chains extend across a range of industry, product and service categories which each carry a different set of modern slavery risks.

Using its UNGP-aligned risk assessment process (further described in Criteria 4), ResourceCo has identified a moderate risk of being 'directly linked' to modern slavery through its supplier relationships, particularly in higher-risk regions such as India and Vietnam. In these regions, potential areas of elevated modern slavery risk include:

- **Geographical risk** where suppliers operate in regions with higher prevalence of labour exploitation and limited enforcement of labour standards (e.g. India and Vietnam);
- **Sector and commodity risk** particularly for goods and services commonly associated with vulnerable or low-wage labour;
- **Complexity of supply chains** where visibility of sub-tier suppliers is limited and monitoring is challenging.

In response ResourceCo has embedded a risk based approach within its modern slavery compliance framework to focus on high-risk suppliers.

### INDIRECT SUPPLIERS (TIER 2)

ResourceCo acknowledges that modern slavery risks are increasingly prevalent deeper within its supply chains (i.e. beyond its direct suppliers (tier 1)). To address this risk, in this reporting period ResourceCo has taken steps to obtain oversight and visibility over the indirect suppliers (tier 2) within some of its high-risk supply chains.

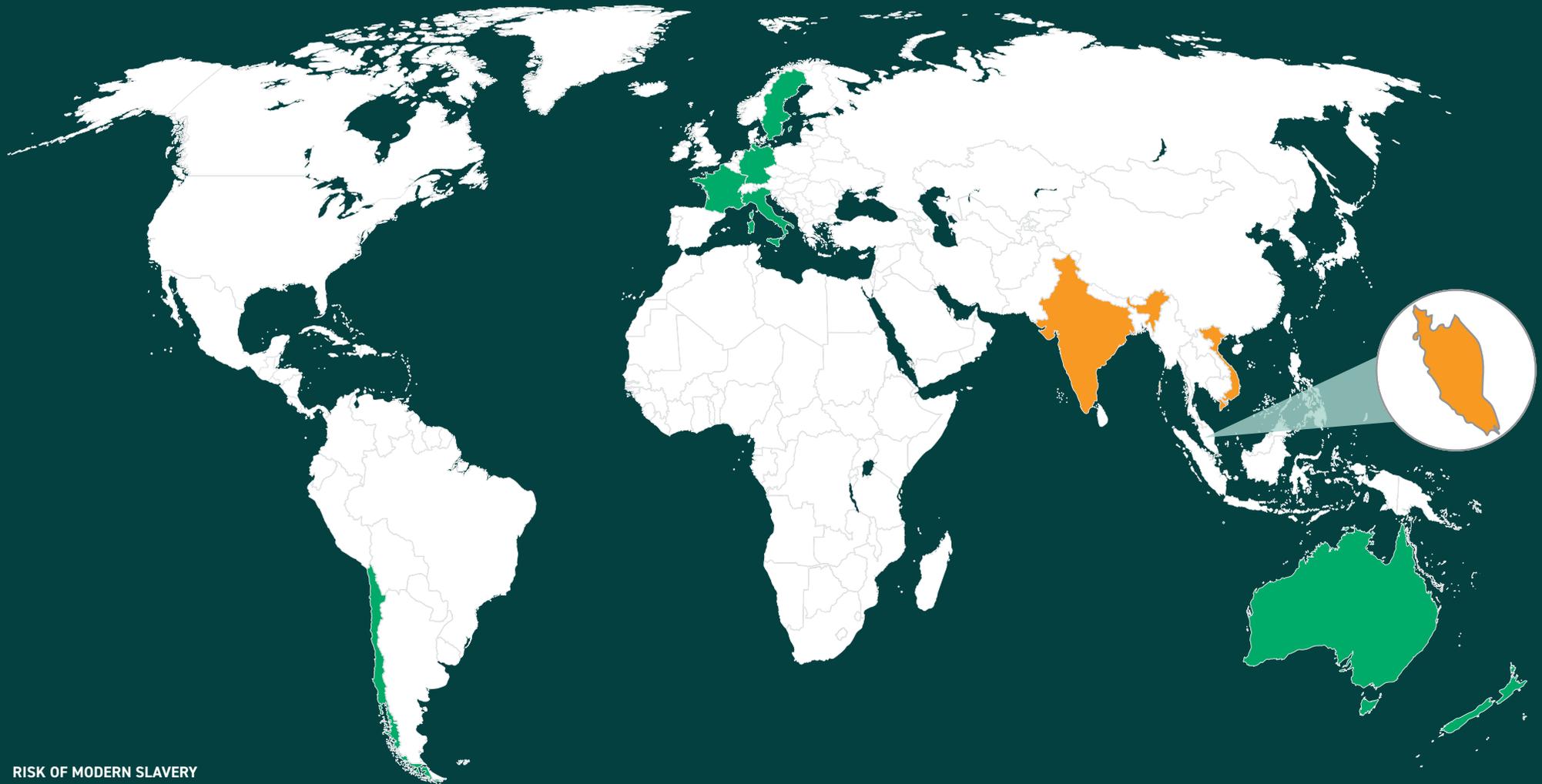
These steps are critical to assessing, addressing and mitigating modern slavery risks in high-risk supply chains and allows ResourceCo to gain visibility over these indirect suppliers (tier 2) which are beyond the contractual control of ResourceCo. The steps taken to assess and address the risks of its indirect suppliers (tier 2) are described further in Criteria 4.

An analysis of modern slavery risks associated with ResourceCo's higher-risk supply chains in FY25 is outlined in the table below:

SUPPLY CHAIN COMMODITY	LOCATION OF RISK (JURISDICTION AND TIER OF SUPPLY CHAIN)	DESCRIPTION OF RISK
 FREIGHT	<b>Jurisdiction:</b> Local <b>Tier:</b> Direct Supplier (Tier 1)	Freight supply chains carry a heightened modern slavery risk due to the fragmented system of regulatory oversight and the isolated working conditions, making workers more vulnerable to exploitation. ResourceCo engages freight providers for domestic transport of recovered materials, and subcontracting increases risk due to decreased visibility over the supply chain.
 CONSTRUCTION	<b>Jurisdiction:</b> Local <b>Tier:</b> Direct Supplier (Tier 1)	The construction industry has been identified as a high-risk industry for modern slavery, largely because of the prevalence of migrant and vulnerable workers in the industry. As ResourceCo engages with a high proportion of construction suppliers, this has been identified as a high-risk supply chain due to the inherent risk factors associated with the sector.  Materials used in construction also carry heightened modern slavery risks. For example, bricks manufactured in countries such as Pakistan and Bangladesh have a heightened inherent risk of child labour and forced labour. <sup>6</sup>
 RECRUITMENT, LABOUR HIRE & PROFESSIONAL ADMIN SERVICES	<b>Jurisdiction:</b> Local <b>Tier:</b> Direct Supplier (Tier 1)	In Australia, labour hire has been identified as a high-risk industry because of the short-term nature of the work arrangements and the lack of regulation surrounding labour hire entities.  This sector generally is particularly vulnerable to modern slavery risks, including deceptive recruitment practices, underpayment of workers and debt bondage. These risks are exacerbated by the frequent outsourcing and subcontracting in these services, which can obscure accountability and make it challenging to ensure ethical labour practices.
 CLEANING	<b>Jurisdiction:</b> Local <b>Tier:</b> Direct Supplier (Tier 1)	The cleaning industry attracts unskilled and migrant workers who are more vulnerable to exploitation. Specific practices such as debt bondage and deceptive recruitment are common within the cleaning industry. ResourceCo uses contracted cleaning providers at its operational sites.
 MERCHANDISE AND UNIFORMS	<b>Jurisdiction:</b> Local <b>Tier:</b> Direct Supplier (Tier 1)	Merchandise, uniform and broader apparel suppliers carry heightened modern slavery risks due to the location of manufacturing factories, often based in high-risk areas such as China. ResourceCo sources uniforms and branded items through contracted suppliers, creating potential exposure within multi-tiered textile supply chains.  These items frequently involve raw materials like linen and cotton, which also carry significant modern supply risks.
 UTILITIES	<b>Jurisdiction:</b> Local <b>Tier:</b> Direct Supplier (Tier 1)	The utilities sector can involve labour exploitation, particularly in regions where oversight is weak. The supply chains for utilities often extend into areas with poor labour regulations, leading to potential risks of forced labour and unsafe working conditions. While ResourceCo's direct utilities suppliers are Australian, the supply chain sources components internationally, increasing risk in the supply chain.

<sup>6</sup>The risk associated with the construction industry is highlighted in the report "Property, construction & modern slavery" by the Australian Human Rights Commission ([https://humanrights.gov.au/sites/default/files/document/publication/ahrc\\_kpmg\\_modernslavery\\_property\\_construction\\_2020.pdf](https://humanrights.gov.au/sites/default/files/document/publication/ahrc_kpmg_modernslavery_property_construction_2020.pdf)).

## SUPPLY CHAINS BY RISK - DIRECT (TIER 1)



RISK OF MODERN SLAVERY

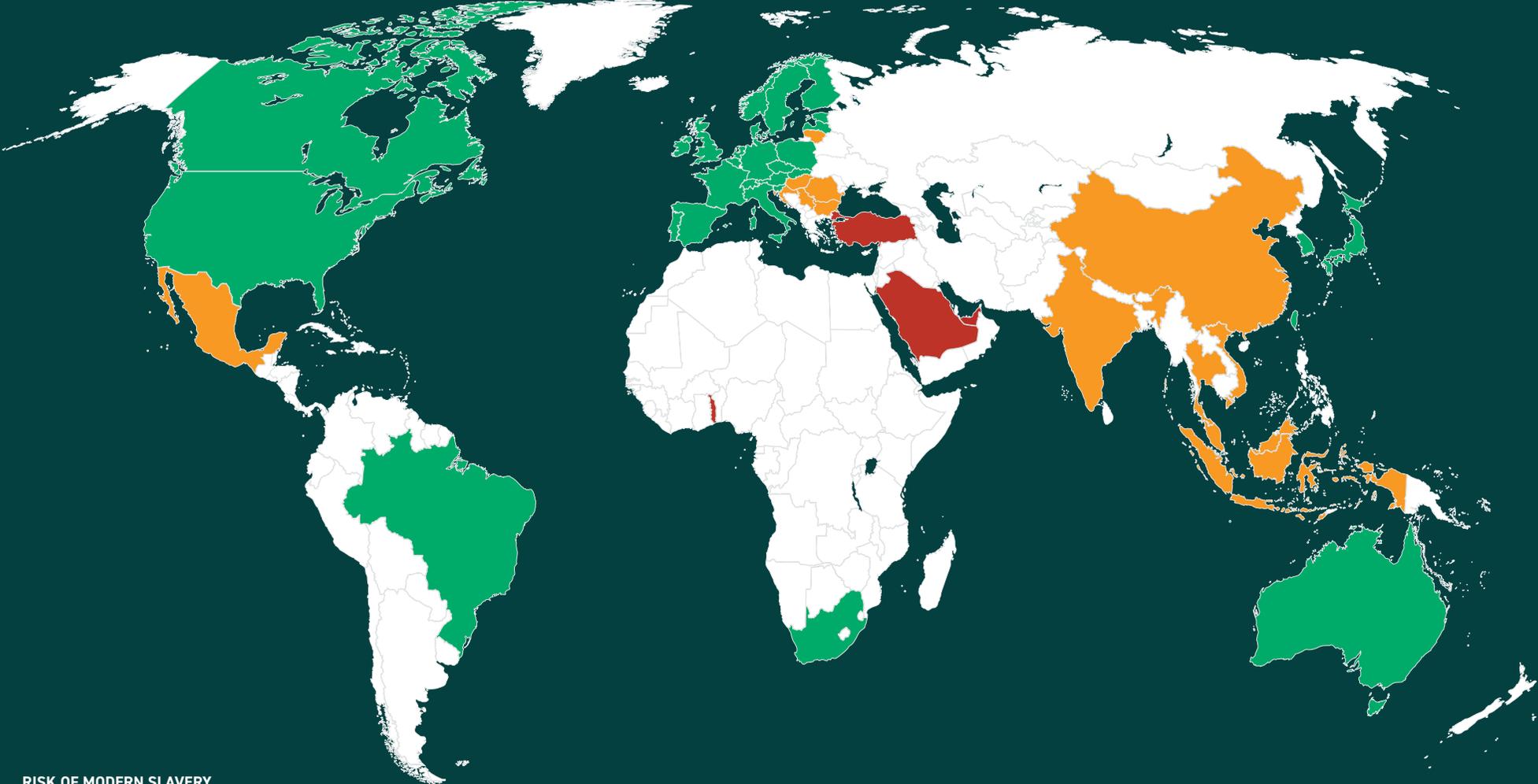
HIGH RISK

MODERATE RISK

LOW RISK

The Walk Free Foundation's Global Slavery Index 2023 assists in prioritising suppliers based on their risk. The map shows the geographic risk associated with our direct suppliers (tier 1). ResourceCo acknowledges that geographic risk is not the sole risk factor that should be used when assessing supplier risk and that a multi-factorial approach should be taken which considers geographic risks, industry/sector risks, product/service risks and entity risks in the risk analysis.

# SUPPLY CHAINS BY RISK - INDIRECT (TIER 2)



RISK OF MODERN SLAVERY

HIGH RISK

MODERATE RISK

LOW RISK

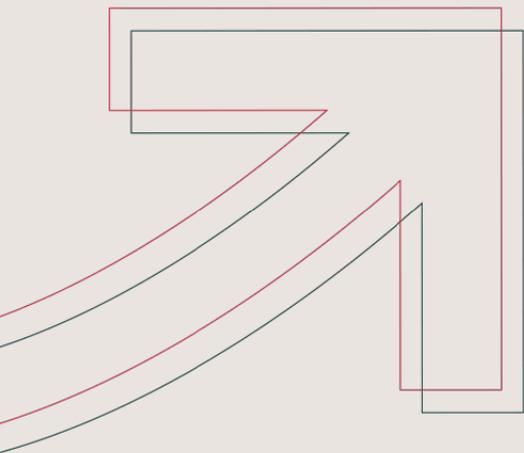
The Walk Free Foundation's Global Slavery Index 2023 assists in prioritising suppliers based on their risk. The map shows the geographic risk associated with our indirect suppliers (tier 2). ResourceCo acknowledges that geographic risk is not the sole risk factor that should be used when assessing supplier risk and that a multi-factorial approach should be taken which considers geographic risks, industry/sector risks, product/service risks and entity risks in the risk analysis.

# Criteria 4

*Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes*

During this reporting period, ResourceCo focused on strengthening its approach to managing modern slavery risks within its operations and supply chains. Efforts were directed towards gaining deeper insight into supplier networks and improving the systems that support supplier due diligence, tracing, and remediation.

A number of initiatives were implemented to enhance governance, supplier engagement, and data quality, ensuring that ResourceCo's risk management processes continue to evolve in line with good practice. The key activities undertaken during this reporting period were:



**1.**

## **DUE DILIGENCE FRAMEWORK**

Implemented the FY24 due diligence framework, strengthening ResourceCo's risk-based assessment process and enhancing industry classifications and internal controls. This improved supplier data quality, with 510 new supplier assessments and 2,265 risk screenings completed.

**2.**

## **SUPPLY CHAIN TRACING**

Refined the FY24 supply chain tracing tools, strengthening supplier engagement. Tracing exercises with 2 high-risk Tier 1 (direct) suppliers providing insight into 10 Tier 2 (indirect) suppliers.

**3.**

## **NEW SUPPLIER TRAINING MODULES**

Expanded supplier engagement through updated training modules, including a new module to assist suppliers in completing supply chain tracing exercises. This initiative built supplier capability and strengthened participation in due diligence activities.

**4.**

## **GOVERNANCE, POLICIES AND PROCEDURES**

Policies and procedures relating to modern slavery compliance were reviewed and updated to ensure continued effectiveness. A key development was the implementation of the Modern Slavery Remediation Procedure, which formalises the coordination of the Remediation Team's response to high-risk findings.

## 1. DUE DILIGENCE FRAMEWORK

ResourceCo's due diligence framework is the foundation of its efforts to assess, address and mitigate modern slavery risks in its supply chains. Over the year, this process has continued to evolve, with enhancements focused on embedding risk-based practices into business-as-usual operations.

Technology plays a critical role in every phase of this approach. ResourceCo's Supplier Portal enables automated risk assessments and supports ongoing due diligence in accordance with the established workflow. It also facilitates periodic refreshment of supplier data to continually assess risk and track changing risk profiles of suppliers.

### DUE DILIGENCE WORKFLOW

During FY24, ResourceCo commenced development of a new due diligence workflow, which was rolled out during this reporting period. The updated workflow introduces a risk-based element alongside the existing spend threshold for issuing the modern slavery questionnaires, shifting ResourceCo's approach toward prioritising high-risk supply chains.

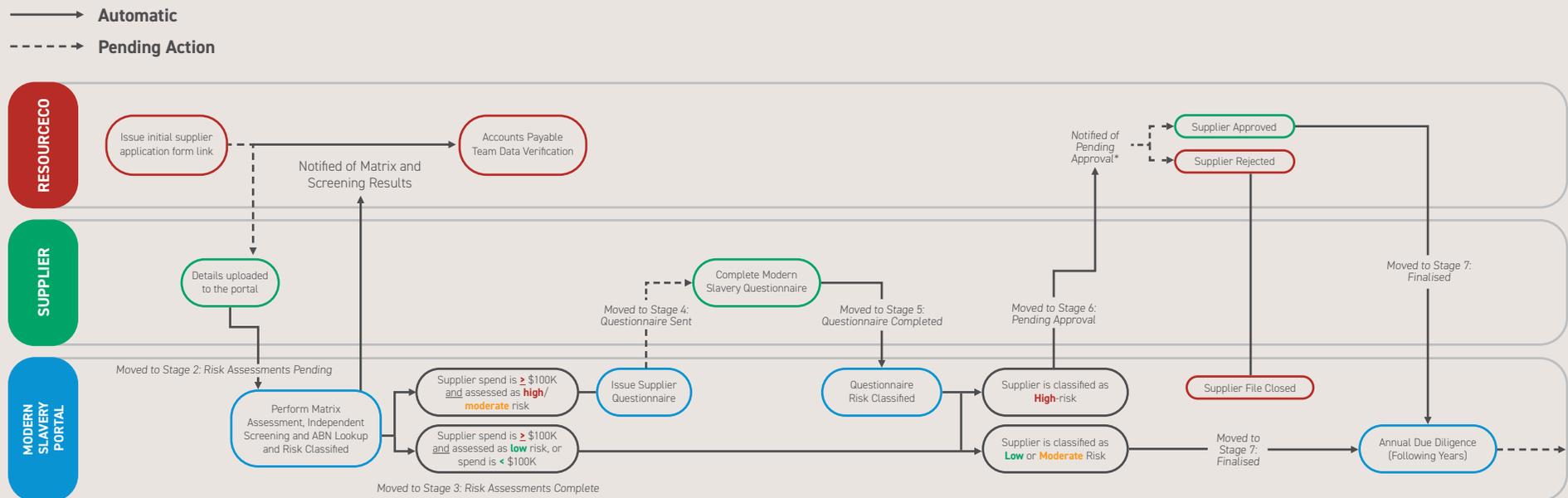
As part of this enhancement, ResourceCo also considered opportunities to improve the integrity of supplier data within the Supplier Portal. A new internal control was implemented within the accounts payable function to verify the data entered by suppliers (relating to *Industry Classification, Spend* and *ResourceCo entity* selection) prior to triggering due diligence actions. This control supports more accurate risk assessments and enables more informed decision making, while also improving visibility across the supply chain.

As outlined in Criteria 3, the most prevalent modern slavery risks lie deeper within ResourceCo's supply chains. The updated workflow enables more targeted due diligence, ensuring efforts are focused where the risk is highest.

### DUE DILIGENCE STEPS

In accordance with the due diligence workflow, the following describe the due diligence steps conducted by ResourceCo through the Supplier Portal.

The use of the Supplier Portal to conduct the below due diligence steps assists ResourceCo in mitigating supply chain risks prior to engaging suppliers. An example of this process working to identify supply chain risks prior to engaging a new supplier is demonstrated in **Case study 1** on the next page.



### RISK MATRIX ASSESSMENTS OF 510 NEW SUPPLIERS

The details of the risk factors considered in the risk matrix assessment process are outlined in Criteria 3. During this reporting period, ResourceCo implemented new industry classifications to ensure that as part of the risk matrix assessment process, suppliers are being assessed against the most up to date industry risk data. This is described further below.

### RISK SCREENINGS UNDERTAKEN ON ALL 2,265 DIRECT SUPPLIERS (TIER 1)

The risk screening process involves screening suppliers through a third party database against the following risk factors:

1. Direct modern slavery risks.
2. Associated risk factors and indicators for modern slavery such as broader human rights breaches, health and safety, underpayment and employment issues, fraud, bribery, and corruption.

The risk screening results provide critical information about a supplier which can determine whether or not ResourceCo continues with the engagement and onboarding of the supplier through the Supplier Portal. An example of risk screening results impacting ResourceCo's use of the supplier is outlined in **Case study 1** to the right.

### ISSUED 53 MODERN SLAVERY QUESTIONNAIRES

Modern slavery questionnaires are issued to all suppliers who meet or exceed the due diligence threshold within the due diligence workflow. Whilst we have a due diligence threshold that prescribes which suppliers are issued with questionnaires, ResourceCo also takes a risk-based approach when issuing questionnaires to suppliers.

If suppliers are below the due diligence threshold but are flagged as high-risk from the risk matrixing and risk screening processes, the Supplier Portal draws these suppliers to the attention of ResourceCo's Modern Slavery Remediation Team. In consultation with internal stakeholders, a decision is made as to whether further due diligence is required (and if so, of what nature). This approach ensures that ResourceCo proactively addresses potential risks and maintains appropriate oversight over its supply chains.

### NEW INDUSTRY CLASSIFICATIONS

During the reporting period, ResourceCo has implemented a new industry classification list. To further refine data quality, in the Supplier Portal ResourceCo removed the "Other" industry classification, which previously limited the ability to understand and analyse supply chain industry exposure. This change has contributed to a more detailed and reliable understanding of supply chain composition.

This industry classification utilises the classifications from the NSW Anti-Slavery Commissioner's Procurement Risk Management Framework which enables ResourceCo to assess industry risk based on specific expense categories within broader industry categories.

This will mean that going forward, ResourceCo's industry risk assessments, which form part of the risk matrixing due diligence process outlined above, will be:

- better aligned with the goods and services provided by the supplier to the ResourceCo; and
- reflective of the most up-to-date risk assessment data.

During the FY26 reporting period, all existing suppliers will be re-assigned with new industry classifications. Where there are any changes to a supplier's risk classification as a result of their new industry classifications, the changes to their risk profile will be tracked in the Supplier Portal.



### Case study 1 - High Risk Screening Findings

*A new supplier of vehicle parts and accessories was proposed to be engaged by the business. During the risk screening process, it was identified that this entity was associated with an entity that had implicit sanctions. Sanctions are considered to be high-risk findings given sanctions (both explicit and implicit) are imposed for serious acts such as acts of terrorism and human rights violations. Accordingly, there is a link between sanctions and modern slavery risk. The Supplier Portal and our third party advisors notified ResourceCo of this finding which prompted a review of the supplier internally with the relevant ResourceCo entity that sought to engage this supplier.*

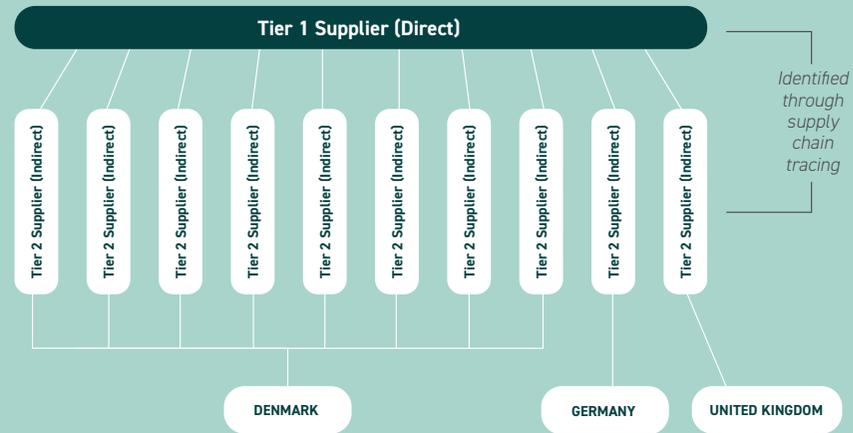
*As a result, and after undergoing internal remediation steps, a decision was made to reject this supplier in the Supplier Portal. This showcases the use of the Supplier Portal to mitigate supply chain risks by identifying high-risk supply chains prior to their engagement by ResourceCo.*



### Case study 2 - Manufacturer classified as high risk

During the reporting period, ResourceCo selected two suppliers for supply chain tracing, one of which was a manufacturer supplier which was classified as high-risk. ResourceCo issued this supplier with the Supply Chain Tracing Training Module. Once this was completed by the supplier, the supplier was issued with the Supply Chain Tracing Questionnaire. The supplier provided ResourceCo with a list of suppliers that they engage to provide goods / services to ResourceCo.

Through this process, ResourceCo has been able to identify indirect suppliers (tier 2) in this supply chain which operate in countries such as Denmark, Germany and the UK. These suppliers have been risk matrixed and risk screened within the Supplier Portal and linked to the direct supplier (tier 1) in the Supplier Portal to form a supply chain map.



## 2. SUPPLY CHAIN TRACING PROCESS

During this reporting period, ResourceCo strengthened its supply chain tracing processes by implementing a bespoke training module and conducting a comprehensive review of its supplier questionnaire. These tools were redesigned to better align with ResourceCo’s operational priorities and risk profile, ensuring suppliers are equipped to provide meaningful insights into their own supply chains.

ResourceCo’s refined supply chain tracing process now requires suppliers to complete:

- A Supply Chain Tracing **Training Module** (outlined on the next page); and
- A Supply Chain Tracing **Questionnaire**.

In FY25, ResourceCo intentionally limited the rollout by issuing the supply chain tracing process to 2 targeted high-risk suppliers. By taking this approach, ResourceCo was able to test and refine the tracing tools developed in FY24, ensuring they were fit-for-purpose and capable of generating actionable insights before broader implementation.

The suppliers selected for this exercise were overseas vendors supplying plant and equipment for ResourceCo’s operating sites. These suppliers were chosen based on a combination of risk factors, including geographic location, industry classification and the nature of goods supplied, all of which indicated elevated modern slavery risk exposure. Their selection also aligned with ResourceCo’s strategic focus on gaining visibility into parts of the supply chain that are typically less transparent and harder to monitor through standard contractual relationships.

Through this exercise, ResourceCo identified 10 Tier 2 (indirect) suppliers which have been risk matrixed and risk screened in accordance with our due diligence framework. **Case study 2** above illustrates an example of how this process enabled ResourceCo to gain detailed insights into a supplier’s extended supply chain.

In one instance, a supplier was unable to provide its full supplier list due to concerns around intellectual property and commercial sensitivity. To address this, ResourceCo’s Modern Slavery Remediation Team introduced a **Modern Slavery Supply Chain Tracing Statement template**. This template allows suppliers to share critical information while protecting sensitive business data.

The template supports ResourceCo’s modern slavery risk assessment obligations and is designed to:

- Validate the **geographic scope** of the supplier’s operations to assess jurisdictional risk
- Clarify the **nature of goods or services** provided to ResourceCo
- Review the supplier’s **due diligence practices**, including any identified risks or incidents of modern slavery
- Assess their **supplier governance**, including selection, monitoring, and relevant policies or codes of conduct

This information enables ResourceCo to evaluate potential risk exposure within its supply chain and demonstrate proactive compliance with modern slavery legislation and ethical sourcing standards. ResourceCo will continue to deploy its supply chain tracing process in future reporting periods to ensure that it continues to maintain visibility and oversight of high-risk supply chains, directly addressing and mitigating risks associated with indirect supplier (tier 2) relationships.

### 3. SUPPLIER TRAINING MODULES

ResourceCo has 2 supplier training modules:

#### MODERN SLAVERY TRAINING MODULE:

ResourceCo has a modern slavery training module which is used to upskill suppliers in understanding modern slavery and monitoring their risks. Not only is educating suppliers a key step towards raising awareness of modern slavery risks and collaborating to identify and mitigate risks deeper in the supply chain, but it is also a useful tool to reinforce understanding and expectations of modern slavery risk management.

For example, this modern slavery training module can be issued to suppliers in instances where:

- it becomes apparent that a supplier lacks a thorough understanding of modern slavery or does not have the necessary processes in place to address and mitigate these risks (for example, inadequate due diligence mechanisms to assess their own modern slavery risks); or

- a supplier provides contradictory answers in the questionnaire process or is identified as high risk based on their responses. In this instance, further engagement with the supplier has occurred in addition to training.

The modern slavery training module is available to all suppliers via the Supplier Portal, where it is prominently bookmarked on each supplier profile. We recognise the opportunity to increase engagement and will focus on enhancing awareness and uptake of this resource in the next reporting period.

#### SUPPLY CHAIN TRACING TRAINING MODULE:

ResourceCo issued the Supply Chain Tracing Training Module to 2 suppliers during this reporting period as part of its supply chain tracing process.

This training module was developed following the FY24 pilot of the tracing process, which identified limited supplier engagement and understanding of the requirements. It provides clear guidance on the classification of Tier 1 and Tier 2 suppliers within a supply chain and explains the purpose of ResourceCo's data requests in meeting its obligations under the Act. Improved engagement in the supply chain tracing process this

reporting period is largely attributed to the introduction of this training module.

Looking ahead, ResourceCo will continue to use and expand this training as supply chain tracing efforts grow. In future reporting periods, ResourceCo aims to increase supplier participation by promoting the use of the module more widely and integrating it earlier in supplier engagement processes.

### 4. GOVERNANCE, POLICIES & PROCEDURES

ResourceCo has a robust suite of policies and procedures which govern our modern slavery compliance and our broader corporate governance structures. These are outlined in the table below.

During the reporting period, the Modern Slavery Prevention Policy, Whistleblower Policy and Supplier Code of Conduct were amended. Updating these policies and procedures was particularly important to ensure that these documents reflect the amendments made to ResourceCo's due diligence processes as well as the surrounding governance structures over the last 2 reporting periods (for example, the introduction of the Modern Slavery Remediation Team).

POLICY / PROCEDURE	PURPOSE
<b>Whistleblower Policy</b>	Provides avenues for eligible disclosers, including suppliers and employees to report disclosable matters (including modern slavery issues) using our external Whistleblower platform (managed by third-party providers).
<b>Anti-Bribery and Corruption Policy</b>	Reflects our zero-tolerance approach to bribery and corruption within ResourceCo.
<b>Employee Code of Conduct Policy</b>	Outlines our expectations for employees conduct, including the responsibility to report any concerns surrounding modern slavery.
<b>Supplier Code of Conduct</b>	Defines our expectations for suppliers, including their obligations to report any concerns (such as modern slavery) to ResourceCo.
<b>Modern Slavery Remediation Procedure</b>	Outlines a procedure for how the Modern Slavery Remediation Team will address non-compliances and heightened risks of modern slavery identified through due diligence.
<b>Modern Slavery Prevention Policy</b>	Outline's ResourceCo's approach to detecting, preventing and responding to modern slavery risks.
<b>Modern Slavery Prevention Procedure</b>	Provides detailed guidance on the specific step undertaken internally to identify, assess and respond to modern slavery risks.

### MODERN SLAVERY PREVENTION POLICY AND PROCEDURE

During the reporting period, ResourceCo reviewed its existing Modern Slavery Policy and revised this policy into 2 separate documents to improve clarity, usability, and alignment with operational practices:

- **Modern Slavery Prevention Policy:** this policy outlines ResourceCo's overarching approach to detecting, preventing and responding to modern slavery risks. It includes key elements of the due diligence framework, and describes the governance structures that support modern slavery compliance across the business.
- **Modern Slavery Prevention Procedure:** this procedure provides detailed internal guidance on the specific steps required internally to identify, assess and respond to modern slavery risks within ResourceCo's operations and supply chains.

The separation was undertaken to ensure clearer role delineation, improve accessibility for internal stakeholders, and support more consistent implementation across the business. The revised documents more accurately reflect ResourceCo's current practices, the role of the Modern Slavery Remediation Team, and the broader governance mechanisms that underpin its compliance efforts.

### MODERN SLAVERY REMEDIATION PROCEDURE

In this reporting period, ResourceCo implemented a Modern Slavery Remediation Procedure. This Procedure outlines the processes for investigating and addressing modern slavery risks and non-compliances identified through the due diligence framework, and the process of monitoring the effectiveness of any remediation actions implemented.

The UNGP's prescribe that organisations that have caused or contribute to adverse impacts such as modern slavery must provide for and cooperate in remediation efforts and must develop processes to facilitate and enable remediation. Furthermore, with proposed changes to the Act on the horizon which are expected to focus on improving how reporting entities are reporting on and disclosing high-risk suppliers, it is important that we have a system and process for how we will assess, address and remediate any non-compliances identified through our due diligence workflow.

The Modern Slavery Remediation Procedure creates a consistent approach to identifying, managing and remediating modern slavery risks and incidents. This consistency is critical not only for ensuring timely and appropriate responses, but also for embedding a shared understanding of modern slavery risk across the business. By integrating the procedure into operational practices, ResourceCo is fostering a culture of accountability and awareness, where business units are increasingly familiar with the signs of modern slavery and the steps required to respond.

The Modern Slavery Remediation Procedure outlines the roles and responsibilities of members of the Modern Slavery Remediation Team and acts as a foundational document to guide the Modern Slavery Remediation Teams role going forward.

This cultural shift has a ripple effect across the business – strengthening internal capability, improving cross-functional collaboration, and reinforcing the importance of ethical sourcing and worker welfare. It also enhances ResourceCo's ability to respond to stakeholder expectations, regulatory obligations, and reputational risks with confidence and transparency.



# Criteria 5

*Describe how the reporting entity assesses the effectiveness of these actions*

The focus of this reporting period was to:

- begin the process of deep diving into ResourceCo high-risk supply chains and identify and obtain oversight of ResourceCo's indirect suppliers (tier 2); and
- implement a new due diligence workflow to shift ResourceCo's approach to due diligence, towards a risk-based approach.

This reporting period has marked a new phase in ResourceCo's modern slavery compliance maturity, reflecting an increasing sophistication in assessing and addressing modern slavery risks.

In ResourceCo's FY24 Modern Slavery Statement, we outlined some proposed action items for the FY25 reporting period. Our progress and assessment against these action items are as follows:

ACTION ITEMS	PROGRESS
<b>Formalise internal audit procedures for audit of our internal operations, including our Asian operations, appropriate frequency, triggers and scope.</b>	ResourceCo's internal audit procedures were under development with a focus in FY25 on reviewing audit processes for our Asian operations. In line with its governance framework, audit frequency, triggers and scope were reviewed and considered. As no significant operational changes occurred during this reporting period, an audit of the Asian site was not required. Modern slavery risks continue to be managed through established governance controls, including executive oversight and periodic audits when required.
<b>Amend our management of change processes to ensure modern slavery is adequately considered in new project proposals and acquisitions</b>	ResourceCo has embedded modern slavery risk considerations into its management of change process and is now focused on ensuring this is applied effectively when considering new project proposals and acquisitions in future reporting periods.
<b>Expand and improve our supply chain tracing efforts through strengthening our communication channels and improving our suppliers' understanding via supplemented training modules</b>	ResourceCo enhanced its supply chain tracing process by incorporating a new training module and questionnaire. The approach was intentionally piloted with 2 high-risk direct suppliers (tier 1) to evaluate its effectiveness prior to broader rollout. This initiative improved supplier understanding and strengthened engagement in tracing activities.
<b>Continue to collaborate with our third party advisors regarding our due diligence thresholds</b>	Collaboration continued throughout the reporting period through monthly meetings with our third party advisors and use of the Supplier Portal. More broadly, ResourceCo continues to assess the effectiveness of its modern slavery compliance framework against the requirements of the Act and the annual action plan that it prepares to guide each reporting period (which, for the FY25 reporting period, included the action items outlined above) with its third party advisors. Going forward, ResourceCo will continue to work with its third party advisors to monitor movements with proposed changes to the Act to ensure that ResourceCo's modern slavery compliance framework is effective for both current and future legislative requirements.
<b>Review of Procurement Policy to address sustainable and modern slavery considerations.</b>	An internal review and consultation process was undertaken regarding the Procurement Policy. Areas of improvement were identified to address modern slavery considerations, which have been rectified in the Supplier Portal.
<b>Review and update of Modern Slavery Policy, Whistleblower Policy and Anti-Bribery and Corruption Policy</b>	Modern Slavery Prevention Policy and Whistleblower Policy have been reviewed and amended. The Anti-Bribery and Corruption Policy is under review.
<b>Further define the role of the Modern Slavery Remediation Team, formalise as a due diligence step in the existing due diligence workflow</b>	ResourceCo's Modern Slavery Remediation Procedure has been implemented, and the corresponding control has been incorporated into the due diligence workflow to ensure potential high-risk findings are managed consistently and escalated appropriately.

# Criteria 6

*Describe the process of consultation on development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered in the statement)*

## GOVERNANCE OF MODERN SLAVERY COMPLIANCE

ResourceCo operates under a robust governance framework (as demonstrated by the diagram on the next page) supported by an Executive Leadership Team (“ELT”) with significant experience in managing complex supply chains. The ELT comprises the CEOs of each of ResourceCo’s 4 operating divisions, the Chief Financial Officer and all functional heads of our Shared Services function (including the Head of People and Culture, General Counsel and Head of ESG), ensuring our key operations and supply chains are represented and consulted.

Oversight of ResourceCo’s reporting and non-reporting entities (outlined in Criteria 2) is the responsibility of the Board, ensuring consistency in procurement and operational practices across the business. Modern slavery risk management falls within the remit of ResourceCo’s Risk Committee, which includes all ELT members and key functional heads. The Risk Committee is responsible for monitoring and reviewing modern slavery risks across ResourceCo’s operations and supply chains. Through this integrated governance approach, ResourceCo ensures that leadership sets the right tone from the top, fostering accountability and oversight throughout ResourceCo’s operations.

The Risk Committee has quarterly meetings which provide a platform for continuous engagement with modern slavery risks for all reporting and non-reporting entities.

The Modern Slavery Remediation Team, which includes internal representatives from across the organisation and external experts, has day-to-day oversight of ResourceCo’s modern slavery compliance framework and is responsible for assessing flagged modern slavery risks, investigating potential non-compliances and determining appropriate next steps.

In conjunction with the Risk Committee, the Modern Slavery Remediation Team, utilising the Modern Slavery Remediation Procedure, ensures that there is a consistent approach to assessing, addressing and mitigating modern slavery risk across the reporting and non-reporting entities.

Accordingly, the involvement of representatives from all ResourceCo reporting and non-reporting entities across the various governance structures ensures ongoing consultation throughout the reporting period. This engagement supports consistent oversight and alignment in modern slavery compliance across the business.

## UNIFORM APPROACH TO DUE DILIGENCE

There is a uniform approach to conducting due diligence across all reporting and non-reporting entities. ResourceCo’s suite of policies and procedures (outlined in Criteria 4) establishes a standardised framework that applies across the whole of ResourceCo, maintaining coherence in how modern slavery risks are managed across its supply chains.

Maintaining aligned due diligence and risk standards, supported by an integrated governance approach, ensures that there is ongoing meaningful consultation between the reporting entities and non-reporting entities.

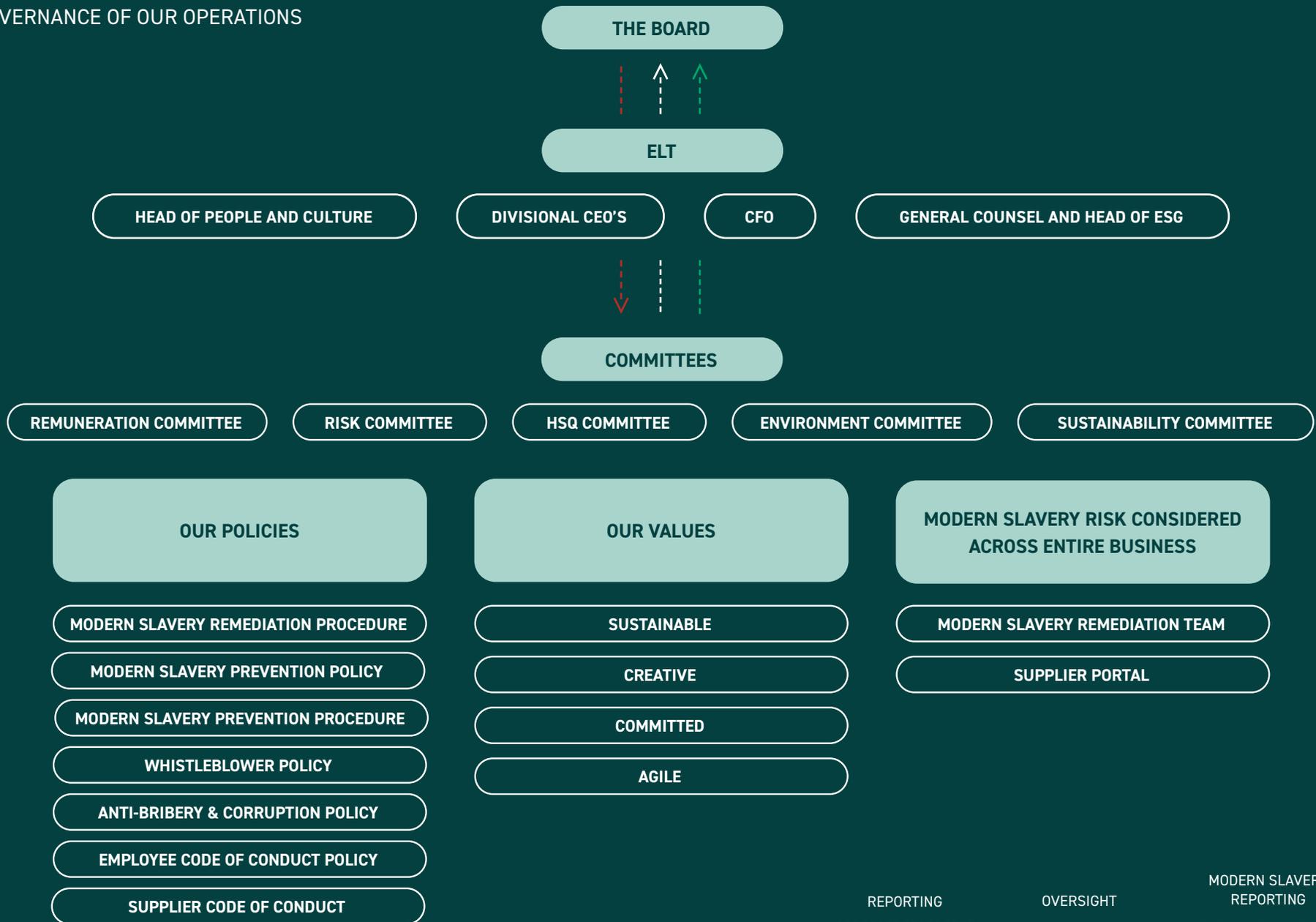
## ONGOING CONSULTATION PROCESSES

In preparing this FY25 Modern Slavery Statement, targeted consultations extended beyond the ELT and Board, involving direct engagement with specific Shared Services functions and management teams across ResourceCo.

This cross-functional collaboration ensures that ResourceCo’s compliance efforts are aligned and coordinated across all entities, promoting an integrated and effective approach to managing modern slavery risks.



GOVERNANCE OF OUR OPERATIONS



# Criteria 7

*Any other information that the reporting entity, or the entity giving the statement, considers relevant*

Our focus for the FY26 reporting period will be to:

- **undertake a review of our modern slavery compliance framework** in light of proposed amendments to the Act (outlined further below);
- **continue supply chain tracing efforts** with the aim of diving deeper into our high-risk supply chains;
- **assess supplier onboarding practices** across Asia to support consistent utilisation of the Supplier Portal and alignment with ResourceCo's due diligence framework;
- **review our Anti-bribery & Corruption Policy** and conduct an internal risk assessment with key stakeholders aligned to current legislative requirements; and
- **review and update the employee modern slavery training module**, ensuring that our staff are kept aware of the requirements of the Act, examples of modern slavery risk factors and what ResourceCo is doing to assess, address and mitigate its operational and supply chain modern slavery risks.

ResourceCo is aware that around the time that this FY25 Modern Slavery Statement was prepared, consultation processes were announced to consider strengthening the Act. Through the Attorney General's consideration of the May 2023 review paper of the Act, it has been indicated that the Government is considering significant reform, such as expanding the reporting criteria and implementing penalties for non-compliance with the requirement of the Act. ResourceCo will continue monitoring movements in this space to ensure that its modern slavery compliance framework meets the requirements of any amendments made to the reporting criteria.



# Board approval

This is ResourceCo's sixth Modern Slavery Statement and is for the reporting period of 1 July 2024 to 30 June 2025.

This statement was reviewed and approved by ResourceCo's Board on behalf of the Reporting Entities.

Date: 12 December 2025



Andrew Poulter  
Chairman

