

Modern Slavery Statement 2022

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This Modern Slavery Statement has been endorsed by the Jennmar Australia board of directors and approved on 11 March 2022.

Peter Roberts

Managing Director

Modern Slavery Policy



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Respecting human rights is an essential obligation of our business including actively ensuring that there is no modern slavery throughout our business activities. The management of JENNMAR Australia has committed to the ongoing assessment of our risk profile and immediate action to address any identified areas of concern.

JENNMAR's Australian manufacturing operations personnel are employed under Commonwealth guidelines dictating conditions and remuneration, and our domestic supply chain has again been assessed as insignificant risk. Despite this we continue the observation of our domestic supply chain in relation to human rights obligations.

Our overseas supply chain continues to present a different element of risk due primarily to the geographical difficulty in assessing supplier operations, which is further exacerbated by the travel limitations in place since 2020 to manage the COVID-19 pandemic.

During the last 12 months we have altered the way in which we manage the overseas element of our supply chain and have committed to important additional in-house resources to enable greater visibility of these activities. Although direct onsite assessment is not currently possible, we have overachieved on our previous commitment on the annual review of our total supply chain.



Introduction

JENNMAR is a leading global manufacturer and supplier of ground support technology for underground mining and tunnelling. Our major Australian manufacturing facilities are located at Sydney, Mackay and Perth. JENNMAR also operates warehouse and distribution centres in the key mining regions of Broken Hill, Mount Isa and Hunter Valley.

JENNMAR's world class research and development centre is also operated at separate premises in Smeaton Grange, where designated research personnel focus on important industry collaboration projects with Australian research organisations and universities.

JENNMAR Australia employs approximately 250 people across our manufacturing, distribution, sales and administration functions. Our manufacturing operations utilise Australian produced steel with a large percentage of our high quality products sold to Australian domestic customers with some export sales.

The primary products manufactured include steel torque tension bolts, friction bolts, cable bolts and steel bearing plates plus a complete range of ancillary products and components. Other specially designed support products including steel mesh and cement grouts are manufactured to strict JENNMAR specifications and quality guidelines by third party Australian providers.



Organisational Structure



JENNMAR Australia Pty Ltd is a wholly owned business of Frank Calandra Inc. (FCI) headquartered in Pittsburgh USA. The JENNMAR Australia Managing Director reports directly to the President of FCI.

JENNMAR Australia's head office is located at our manufacturing facility in Smeaton Grange NSW.

JENNMAR Australia Pty Ltd does not have any subsidiaries. The following are related corporations of JENNMAR Australia Pty Ltd:

- FCI Holdings Australia Pty Ltd
- FCI Properties Australia Pty Ltd
- JENNCHEM Australia Pty Ltd

All relevant personnel have been made aware of and provide equal commitment to our obligations in relation to human rights and modern slavery. The supply chain for these organisations is overseen by senior personnel from JENNMAR Australia.



Our Supply Chain

JENNMAR Australia maintains a mature and reliable supply chain for all incoming goods and components and all outgoing products. JENNMAR is a strong supporter of Australian manufacturing and primarily sources raw materials and components from long established and credible Australian domestic producers. Currently the bulk of all material and component purchases are supplied from within Australia, whilst relatively small percentages of purchases are made from JENNMAR related overseas corporations and from non-related suppliers in China and Japan.

Finished goods are transported to directly to our customers or to other JENNMAR locations using an approved network of transport providers. JENNMAR also operates our own in-house transport fleet for the movement of products within NSW.



Risks of Modern Slavery Practices



A thorough review of our Modern Slavery risk assessment was completed including our key material and component supply chain. An outcome of the risk assessment was to maintain the existing supply chain risk categories including:

- Domestic suppliers
- Related international suppliers
- International suppliers China
- International suppliers Japan

Domestic suppliers, have been categorised as insignificant risk due to the fact that they operate under commonwealth guidelines and Australian government legislation, plus their operations are readily accessible for assessment by JENNMAR personnel.

Related international suppliers, have been categorised as insignificant risk due to the fact that JENNMAR has direct control over the employment conditions of its personnel.

International suppliers – China, have been categorised as moderate risk for JENNMAR owing to the geographical difficulty in accessing their operations. This risk is being further controlled with the dedicated inhouse resources now in place to manage our supply from this region.

International suppliers – Japan, have been categorised as insignificant risk owing to the fact that it consists of large multi-national suppliers and their operations have been previously visited and reviewed on multiple occasions by JENNMAR representatives.



Actions

Our procurement process includes undertaking due diligence and evaluation of proposed supplier quality management systems. An outcome of our initial Modern Slavery risk assessment was the expansion of this process to include the evaluation of modern slavery practices.

With a total base of more than 300 suppliers, we place a high emphasis on quality, security of supply and sustainability and have long term business relationships with many of our suppliers both domestic and international.

Prior to COVID-19 our key international suppliers were visited annually by a representative from JENNMAR Australia and their operations and supply performance reviewed to ensure they could sustainably continue to maintain secure supply to JENNMAR of quality components.

Following the revision of our initial detailed risk assessment, our total supplier base continues to be categorised into two separate groups:

- 1. Suppliers where a Modern Slavery Assessment was deemed necessary
- 2. Suppliers where a Modern Slavery Assessment was not deemed necessary

The key action for JENNMAR remains to be our commitment to the annual assessment of 25% of our supplier base where a Modern Slavery Assessment is deemed necessary. This will continue to include the assessment of current suppliers and the evaluation of all new suppliers.

Where a face to face assessment of an international supplier is not possible, assessments will be undertaken by experienced JENNMAR Australia personnel or by a JENNMAR approved credible third party provider.

Any suppliers found to have areas of potential concern within their business will be provided the opportunity to respond to the concerns. If the response is unsatisfactory and an acceptable way forward cannot be agreed between both parties, JENNMAR will look to source materials from alternative approved suppliers.



Evaluation Effectiveness



Our commitment to supply chain reviews for 2021/2022 has now been completed with 100% of our assessed suppliers cooperatively participating in the process. No instances or suspicions of modern slavery practices have been identified from any of our targeted annual reviews for 2021/2022.

The effectiveness of JENNMAR's actions to identify and eliminate potential incidences of modern slavery practices from our total supply chain will continue to be reviewed as part of our annual statement preparation and submission process.

The commitment required from our suppliers will be measured as a combination of their formal responses to our reviews, as well as their willingness to both participate in the reviews and their response to any identified areas of concern within their businesses.

JENNMAR's commitment to the process will be demonstrated by our actions in the event that any potential instances of Modern Slavery are identified in our supply chain as a result of our reviews. Each year 25% of suppliers will be assessed as part of our ongoing commitment to reviewing our supply chain risks.

The results of our annual efforts will form part of future statement submissions and any necessary refining of our review processes.



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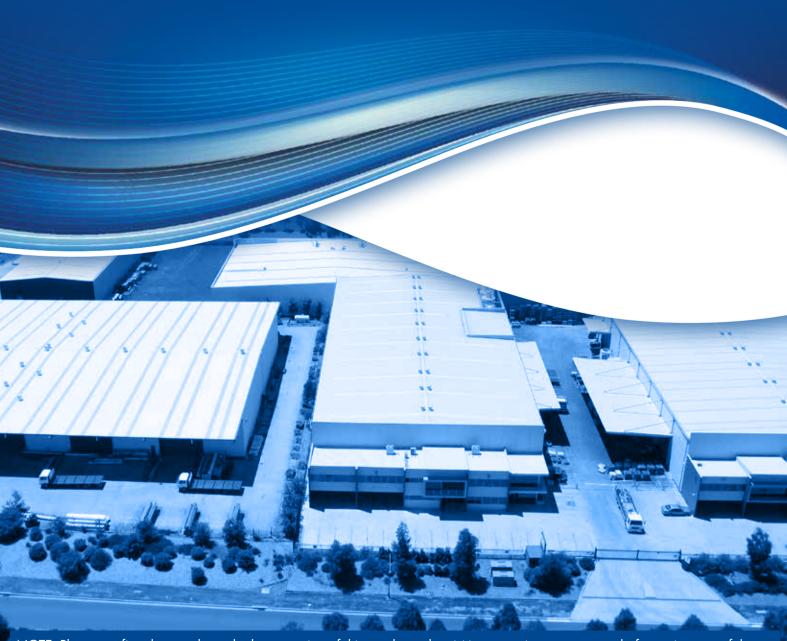
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