

RIVET GROUP

Modern Slavery Statement – FY2021



Introduction

This joint statement is made under the Australian Modern Slavery Act 2018 (Cth) for the financial year ending 30 June 2021 (“FY21”) and is published on behalf of Blondie Trading Pty Ltd (ACN 621 811 845) and its consolidated subsidiaries (Rivet Group).

It covers the operations and supply chain of the Rivet Group which includes the following Australian reporting entities in accordance with s14(1) of the Act:

- Rivet Mining Services
- Rivet Energy
- Rivet Aviation
- Refuel International
- SMS Mining Services

In order to prepare this joint statement, we engaged with each of the reporting entities covered by this statement and consulted the entities we own or control, including consulting with Blondie Trading Pty Ltd.

Rivet Group acknowledges and recognises that modern slavery occurs in many forms including slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage and child labour.

Rivet Group will not tolerate any form of human rights abuses, including modern slavery in our operations and supply chains. This statement outlines Rivet Group’s approach to ensuring we have robust systems and procedures in place to minimise the risk of modern slavery.

This statement reports on the financial year from 1 July 2020 to 30 June 2021.

Structure, Operations & Supply Chain of Rivet Group

The Rivet Group is an Australian provider of specialised transport and logistics, contract mining, equipment hire and maintenance and aviation services. The Group consists of Rivet Mining Services, Rivet Energy, Rivet Energy Aviation, Refuel International and SMS Mining Services.

Rivet Mining Services

Rivet Mining Services (RMS) provides bulk haulage and ancillary onsite services (such as road construction and maintenance operations) to mining companies operating in the key resource producing regions of Western Australia. Services primarily comprise of truck haulage across off-road and on-road (highway) routes from mine to port facilities and/or processing infrastructure.

Rivet Energy

Rivet Energy is a national provider of LPG and liquid fuel logistics for global oil and gas companies in key metropolitan centres and interstate routes throughout Australia. With over 47 years' of industry experience, Rivet Energy delivers benchmark service levels and specialist workshops in key metropolitan locations throughout Australia.

Rivet Energy Aviation

Rivet Energy Aviation provides specialist technical labour and services for aircraft refuelling at Tullamarine Airport in Victoria and Adelaide Airport in South Australia. The team operates specialised refuelling equipment on the ground to refuel aircraft and manages fuel farms at each of the sites.

Refuel International

Refuel International is a global leader in the manufacturing of mobile aviation refuelling equipment. With over 50 years' knowledge and experience, it is an expert in the field of designing and constructing the highest quality mobile aviation equipment, catering to customers' specific needs.

SMS Mining Services

SMS offers life of mine services including equipment rental, maintenance and contract mining to the surface mining sector. It has one of the largest privately owned mining fleets in Australia and has workshops facilities in three strategically locations in Western Australia.

Rivet Group's supply chains are, but not limited to, the following:

Supply Chains		
Subcontractors	Spare Parts	Fuel / Oil / LPG
Labour Hire	Vehicle Servicing	Motor Vehicles & Plant
Personal Protective Equipment	Cleaning Services	Trailers and ancillaries
Marketing/Promotional Material	Equipment Suppliers	Tyres
IT Software/Hardware	Packaging	Stationary Supplies
Material Handling Equipment	Uniforms	

Risks of Modern Slavery in Rivet Group Operations & Supply Chain

Rivet Group is aware of the potential to inadvertently cause, contribute to or be linked to modern slavery through our operations and/or supply chains. Throughout this reporting period, Rivet Group completed an analysis of our operations and supply chains to identify our modern slavery risks.

This analysis highlighted Rivet Group's most prominent operational risk to inadvertently causing, contributing to, or being linked to modern slavery continues to be through the engagement of labour hire workers and/or subcontractors to provide a vast array of services.

The analysis identified two key industries in our supply chain with increased risk to inadvertently cause, contribute to, or be linked to modern slavery continues to be the suppliers of Personal Protective Equipment (PPE) and uniforms and Marketing / Promotional Material.

Action taken by Rivet Group

A direct action taken by Rivet Group to minimise our most prominent operational risk of engaging labour hire workers and/or subcontractors was the introduction of a new clause provided by our internal legal department to be included into all supplier contracts addressing modern slavery in the operational and supply chains used in the performance of supplier contracts and its associated risks.

Rivet Group also continues to practice employing the vast majority of our workforce directly and only engages labour hire or subcontractors to assist with manning in peak periods and to cover short term roles. This means practice, along with our sound risk management, relevant policies and procedures and compliance to relevant employment law(s) and industrial instruments, the risk associated with engaging labour hire and subcontractors are minimised.

Rivet Group also abides by the *Contractor Driver Minimum Payments Road Safety Remuneration Order* to ensure minimum requirements are met for all employees, labour hire and subcontractors.

Rivet Group's senior management team is experienced in risk analysis and management. The senior management team is supported by each entity's general manager and by the Health, Safety, Environment & Training and Human Resources teams.

Rivet Group believes sound analysis and management of risks, supported by the below policies and procedures, will assist in defining and guiding a culture that does not allow any type of human rights abuse to occur:

- Rivet Group Code of Conduct
- Rivet Group Minimum Standards of Conduct
- Rivet Group Whistleblower Policy
- Rivet Group Equal Employment Opportunity Policy
- Rivet Group Risk Management Policy

Rivet Group requires all suppliers in our supply chain identified as high-risk suppliers (Personal Protective Equipment and uniforms or Marketing/Promotional Material) to be internally reviewed by our Human Resources team against the below risk matrix:

Sector & Industry Risks

Is there a high prevalence of modern slavery in the particular industry or sector?

Product and Services Risks

Is there a high prevalence of modern slavery associated with the good or service?

Geographic Risks

Is there a high prevalence of modern slavery in the location that the production or service is sourced or produced from?

Supply Chain Model Risks

Is the supply chain model the supplier is likely to be involved in carry a greater risk of modern slavery?

The internal review completed in this reporting period identified the likely modern slavery risks across the four categories for each high-risk supplier and ranked each supplier's risk level under each individual category using the following ranking system:

- Low Risk Level = 1
- Medium Risk Level = 2
- High Risk Level = 3

An overall score for each organisation was tallied and organisations with a score of 9 or higher were identified as a high-risk supplier. All high-risk suppliers were requested to complete an internal "Rivet Group Supplier Questionnaire". The Rivet Group Supplier Questionnaire is a tool to assist Rivet Group assess our high-risk suppliers' policies and practices to identify, assess and mitigate modern slavery risks in their supply chains and operations.

Rivet Group is committed to collaborating with our high-risk suppliers to ensure any modern slavery risks identified through the information provided these suppliers in the Rivet Group Supplier Questionnaire are addressed accordingly and in an appropriate timeframe.

COVID-19

COVID-19 has continued to have a significant effect on Rivet Group's operations and supply chain. The international, interstate, and intrastate lockdowns and border closures that have been implemented by federal and state governments around the world have restricted the movement of employees and goods both internationally and within Australia. These international, interstate, and intrastate lockdowns and border closures has had a direct impact on Rivet Group's operations and supply chain, specifically with the following entities:

Rivet Aviation due to the downturn in the aviation industry caused by COVID-19

Refuel International due to the downturn in the aviation industry caused by COVID-19

Rivet Mining Services due to the high percentage of interstate workers being unable to travel to and from the workplace in Western Australia due to state border controls

Rivet Group understand and acknowledges these impacts can increase the vulnerability of workers in our operations and supply chains to modern slavery due to the increase vulnerability to loss of income or fear of loss of income, requirements to work excessive overtime to cover capacity gaps, increased demand due to supply chain shortages or the inability to safely return to home states or countries.

Many overseas and interstate employees, labour hire personnel and subcontractors elected to remain on site and avoid travelling to their “home” state during times of international and interstate border restrictions.

To ensure employees, labour hire personnel and subcontractors were not forced to remain on site when they were unable or unwilling to return to their “home” state, they were offered the following benefits:

- Additional payments for genuine agreed overtime worked within relevant fatigue management laws
- Accommodation provided in the local town or capital city
- Meals provided to them during their stay
- If they opted to return to their “home” state, payment for their time during isolation upon return to the state in which they are engaged to work in.

To ensure employees were not impacted, or fearful of being impacted from workforce reductions, Rivet Group communicated clearly, consistently, and regularly with all employees, labour hire personnel and subcontractors engaged to complete work for entities effected by the downturn of the aviation industry due to COVID-19. Communication included business updates specific to the entity, updates relevant to the Rivet Group including internal vacancies across the group, and updates regarding the aviation industry in general.

Assessing the Effectiveness of Rivet Group’s Actions

Rivet Group continuously monitors our current processes to determine the effectiveness of these processes in identify the key risks of modern slavery in our operations and supply chains and take action to mitigate those risks. Rivet Group monitors these key risks by working closely with our suppliers, particularly those identified to be high risk suppliers, to track and assess the effectiveness of the actions taken by Rivet Group and by the suppliers and the outcomes of these actions. Rivet Group will use this assessment to continue to improve identifying our risks to modern slavery in our operations and supply chains and to improve our action taken to mitigate these risks.

This Statement was approved by the board of the Rivet Group on 29th December 2021.



Mark Rowsthorn

Managing Director

Rivet Group