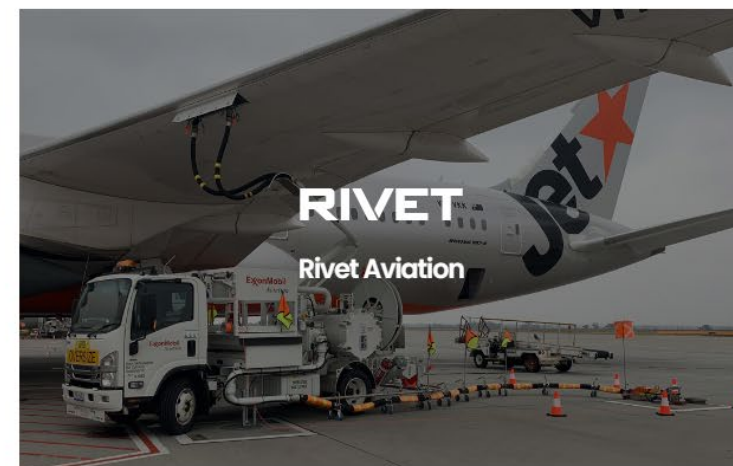
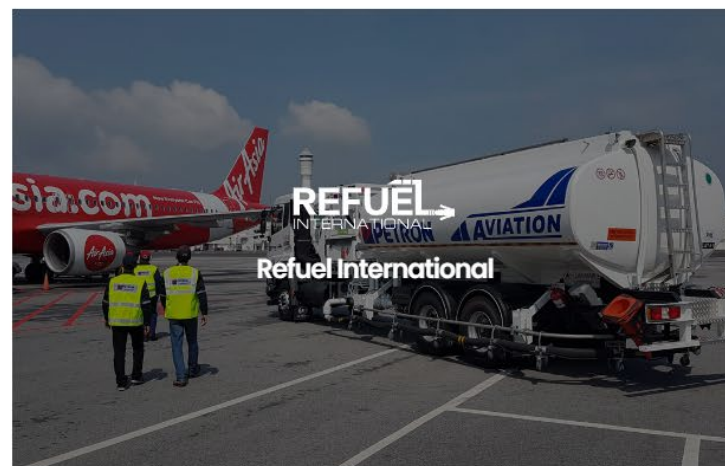
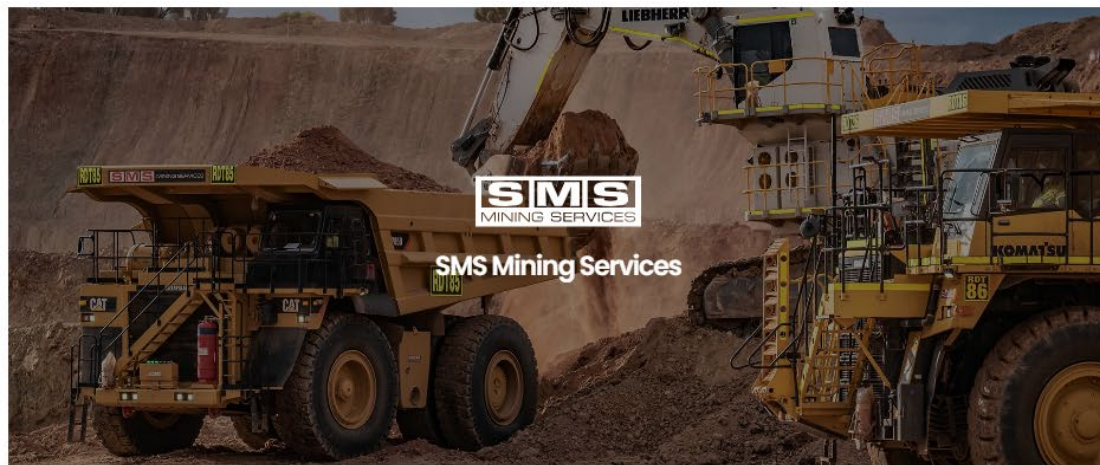


RIVET GROUP

Modern Slavery Statement – FY2022



Introduction

This joint statement is made under the Australian Modern Slavery Act 2018 (Cth) for the financial year ending 30 June 2022 (“FY22”) 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
- Kirkalocka Gold SPV
- Adaman Gold

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 2021 to 30 June 2022.

Structure, Operations & Supply Chain of Rivet Group

The Rivet Group is an Australian-owned specialised transport, logistics and mining services company.

Rivet Group load, haul, and process millions of tonnes of bulk commodities, LPG & liquid fuel for our customers in the Resources, Aviation and Oil & Gas industries.

With a national footprint and maintenance operations strategically located across major metropolitan and regional centres, we provide a holistic and customised logistics solution to our mining, oil, and aviation customers.

Rivet Group consists of Rivet Mining Services, Rivet Energy, Rivet Energy Aviation, Refuel International, SMS Mining Services, Kirkalocka Gold SPV and Adaman Gold.

Rivet Mining Services

Rivet Mining Services (RMS) provides on-road, off-road and out-of-pit bulk commodity handling services to our customers in the mining industry.

Rivet Mining Services are proud of our diverse fleet of late model trucks, trailers and ancillary mining equipment which means we can select the best gear for the job every time. Our highly skilled workforce also provides ancillary services such as Crushing & Screening, Crusher Feed/ROM Management and Road Construction.

SMS Mining Services

SMS Mining Services contract mining services includes drill & blast and crushing & screening services across multiple mineral commodities including gold and iron ore. Our onsite services include stockpile management, crusher feed, road construction and maintenance.

SMS Mining Services also operate one of Australia's highest quality & largest mining rental fleets with fully maintained wet & dry hire flexibility. Our fleet is supported by fully equipped workshops stocked with on-call spare parts and staffed by highly experienced operating & maintenance teams.

Rivet Energy

Rivet Energy is a national provider of LPG and liquid fuel logistics. Our specialised fleet of tankers and prime movers operate across a national platform in all key metropolitan areas and interstate routes.

Transporting LPG, Propane and Butane from refineries and storage centres to service stations and retail distributors we have a strong focus on safety technology and service reliability. Our fleet of late model prime movers and tankers is operated and maintained by a team of experienced drivers and workshop personnel.

Rivet Energy Aviation

Rivet Energy Aviation provides aircraft refuelling services at Australian airports to commercial and passenger aircraft. We use a wide range of hydrant dispensers, hydrant trucks and tanker trucks for our refuelling activities.

Rivet Energy Aviation also manages the Joint User Hydrant Installation (JUHI) at Melbourne Airport on behalf of global oil companies. JUHI is a jet fuel storage facility and pipeline servicing various subsurface aircraft refuelling points (hydrants).

Refuel International

Refuel International is a highly specialised manufacturer and supplier of refuelling vehicles and hydrant dispensers servicing the aviation industry. Our equipment is designed for efficient and safe aircraft refuelling at any location.

Refuel International are an Original Equipment Manufacturer (OEM) which means that every piece of Refuel International equipment can be customised according to customers' exacting specifications. Customers also have the reassurance of knowing that our refuelling equipment is compliant with stringent international aviation industry standards

Rivet Group's supply chains include, but are 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. Each reporting period, we utilise a risk assessment methodology that considers several indicators or modern slavery risks including sector and industry risks, products and services risks, geographical risks, and supply chain model risks.

This reporting period's risk assessment of modern slavery risks through our operations and/or supply chains confirmed that our operations and supply chain is at low potential of modern slavery risks.

The methodology confirmed that our highest risk areas for modern slavery through our operations and/or supply chains remains through the engagement of subcontractors and labour hire personnel and through our suppliers of Personal Protective Equipment (PPE) and uniforms and Marketing / Promotional Material.

Action taken by Rivet Group

Policies / Risk Management

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

Subcontracts / Labour Hire Personnel

Rivet Group 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 practice, along with our sound risk management, relevant policies and procedures and compliance to relevant employment law(s) and industrial instruments, means 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.

High Risk Suppliers

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 a risk matrix.

All high-risk suppliers were requested are required 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.

Awareness & Training

Rivet Group continued to raise awareness to employees on modern slavery risks within our operations and supply chain and how to mitigate those risks.

COVID-19

COVID-19 has continued to have a significant effect on Rivet Group's operations and supply chain. In the portion of the reporting period, 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.

In the second portion of the reporting period, as Covid-19 related border restrictions and general restrictions were eased, global supply chain have remained heavily impacted with significant delays and cost increases occurring across most industries. These significant

impacts have not created an increased potential to modern slavery risks to Rivet Group's supply chain as we have continued to engage a consistent, reputable supplier list throughout the pandemic.

Assessing the Effectiveness of Rivet Group's Actions

Rivet Group continuously monitors our current processes to determine the effectiveness of these processes in identifying 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 uses this ongoing 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 Rivet Group on 21st December 2022.



Mark Rowsthorn

Director

Rivet Group