

Modern Slavery Statement FY23



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More**

This Statement is made under the Australian Modern Slavery Act 2018 (Cth) (the Act) for the financial year ending 30 June 2023 ("FY23") and is published on behalf of Perenti Limited (ACN 009 211 474) and the following Australian and international entities which are reporting entities under the Act:

- African Mining Services Senegal Suarl
- African Underground Mining Services Burkina Faso Sarl
- AMAX Ltd
- AUMS (T) Limited
- Ausdrill Mining Surface Botswana Proprietary Ltd
- Ausdrill Pty Ltd
- Barmenco Limited
- Barmenco Mining Services Botswana Proprietary Ltd
- Barmenco Mining Services Canada Limited
- Underground Mining Alliance Ltd

References in this statement to Perenti, we, us and our, refer to Perenti Limited and all its controlled entities (including the reporting entities) as at 30 June 2023.

Perenti's acquisition of DDH1 Limited (DDH1) was completed on 6 October 2023, after the reporting period covered by this Statement. Details of DDH1's management of modern slavery risks will be incorporated into Perenti's modern slavery statement for the financial year ending 30 June 2024.

This Statement is Perenti's fourth modern slavery statement and details the steps it has taken in the last financial year to assess modern slavery risks within its operations, inclusive of its supply chain, and the actions being taken to help manage these risks. Perenti's previous modern slavery statements containing prior commitments and actions can be found on the Australian Border Force website [here](#).

All dollar values in this modern slavery statement refer to AUD.

Legislative Requirement	Section	Page
Identify the reporting entity	Inside cover	2
Describe the structure, operations, and supply chains	Our Company	4-6
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Identifying and Assessing Modern Slavery Risks	7
Describe actions taken to assess and address risks including due diligence and remediation processes	Managing Modern Slavery Risks	7-8
Describe how the effectiveness of actions are assessed	Assessing Effectiveness of Modern Slavery Management at Perenti	9
Identify process of consultation with controlled entities	Consultation	
Any other information that the reporting entity, or the entity giving the statement, considers relevant	N/A	N/A

FY23 in review

Commenced two site-level supplier social audits

Updated our external grievance procedure for roll out in FY24

Further embedded modern slavery management under the updated operating model

Local employment in our international operations has remained high at 90%

During this reporting period Perenti focused on enhancing existing processes and embedding stronger modern slavery management practices under the updated operating model. We also commenced our supplier social audit program designed to verify supplier performance against the Perenti Code of Conduct, relevant international standards, and other applicable laws and regulations.

As part of Perenti's updated operating model we developed a suite of Group standards that define the minimum performance requirements that must be achieved by Divisions. A Sustainability Group Standard, Human Resources Group Standards and Security, Emergency & Crisis Management Group Standard were developed and implemented which strengthens modern slavery management within the business.

Progress on FY23 commitments

FY23 Commitment	Status	Description
Incorporate more comprehensive due diligence for human rights related risks in the new country risk assessment process.		New country entry procedure drafted which incorporates comprehensive due diligence for modern slavery related risks, which will be rolled out in FY24.
Commence implementation of the Sustainability Group Standard that will standardise Perenti's requirements relating to human rights and modern slavery.		Standard implemented which sets business-wide approach to manage sustainability-related risks, including human rights and modern slavery risks.
Continue to play an active role in the Western Australian Human Rights Resource and Energy Collaborative (HRREc) to provide consistency across the industry in managing modern slavery risks.		Continued to participate in HRREc.
Implement the Contracting Group Standard, inclusive of modern slavery requirements, and if necessary, update Divisional procurement standards to align with the Contracting Group Standard.		Standard drafted and scheduled for implementation in FY24.
Expand the scope of the supplier human rights risk profile tool to categorise and manage additional suppliers.		Supplier risk tool updated to categorise and assess additional regions and suppliers.
Undertake a social audit of a high-risk category supplier.		Social audits of two high-risk category suppliers commenced.
Continue to align the documents that govern procurement practices to ensure they comply with Perenti's human rights commitments.		Process of alignment is ongoing under roll out of the Perenti Governance Framework.

In May 2023 Canada passed Bill S-211, the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*. Barmenco Mining Services Canada Limited falls within the definition of "entity" in the Act as it provides some goods to clients and imports goods and equipment into Canada from time to time. Therefore, Barmenco Mining Services Canada Limited will comply with the reporting obligations in Part 2 of the Act by submitting an annual report on or before 31 May from 2024.

Our company

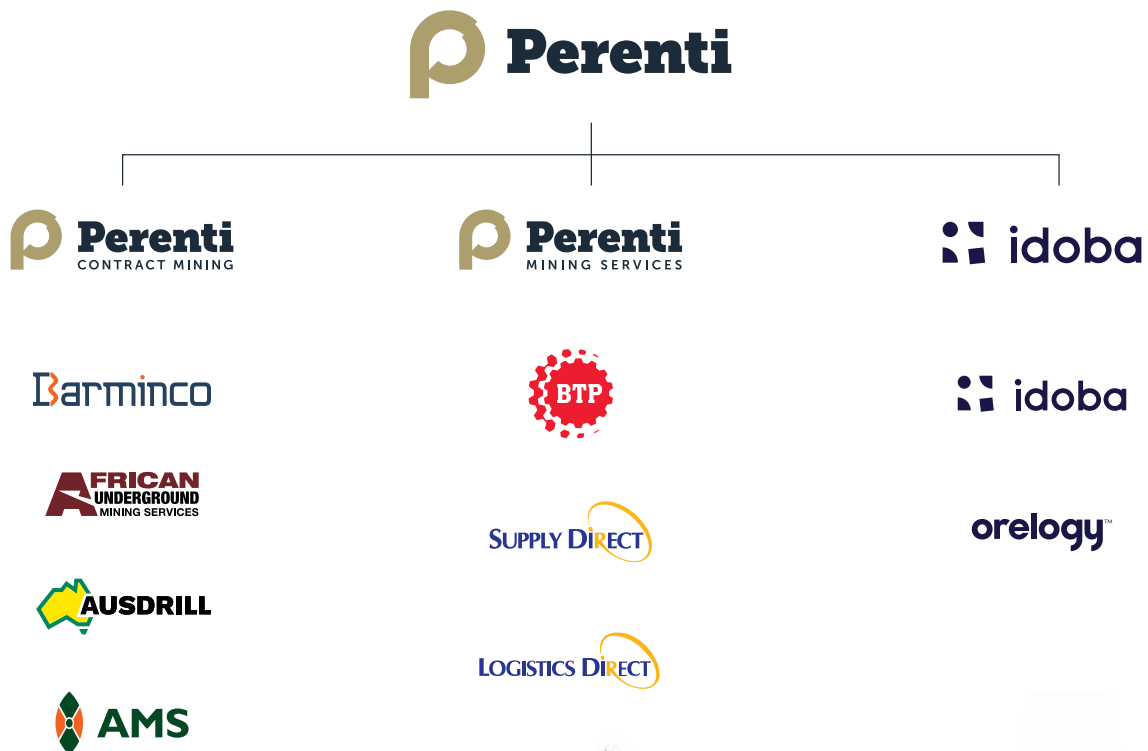
Perenti is a diversified global mining services group incorporated in Australia and listed on the Australian Securities Exchange (ASX: PRN). Headquartered in Perth, Australia, Perenti is today one of the world's largest mining service companies providing surface and underground mining at scale. Our portfolio consists of sustainable, inter-related and value-adding mining services and technology focused businesses. The Company has operations and offices in 11 countries, and a workforce of ~9,000 people primarily in Australia and Africa.

The three divisions are supported by Perenti's corporate centre, which is responsible for supporting and enhancing the long-term success of the Group by ensuring development of current and future Perenti leaders, investing capital to deliver future growth, governance on high-risk areas, promoting our brand and safeguarding our reputation. Further information on Perenti's organisational structure can be found in the annual report [here](#).

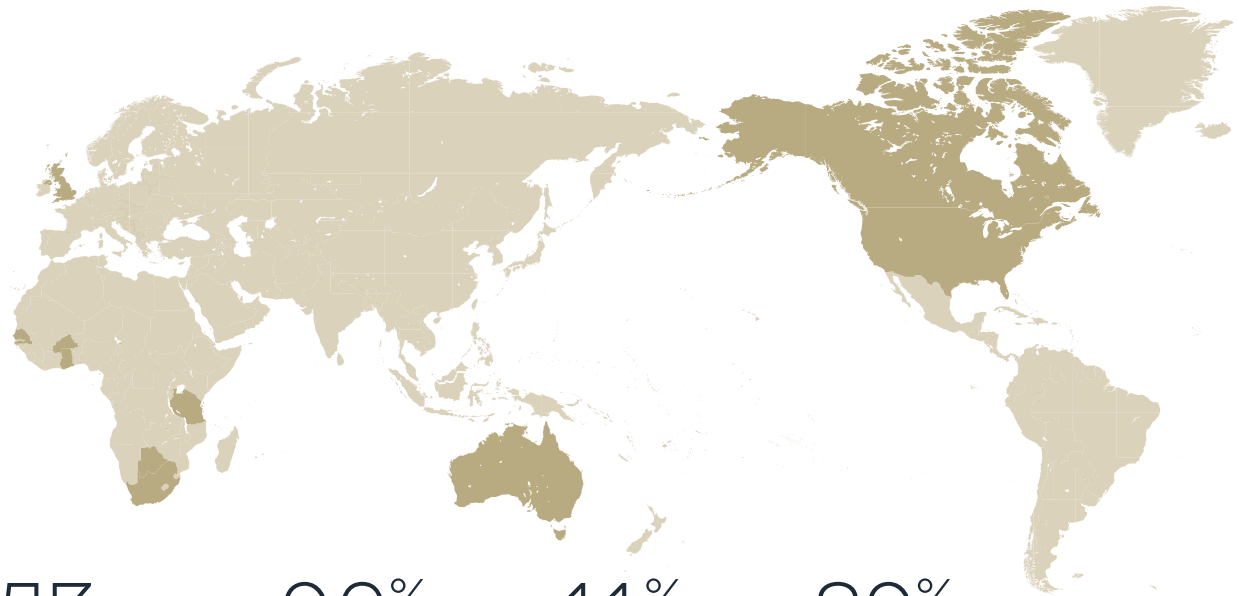
- **Contract Mining** – This division is one of the world's largest mining contractors with demonstrated industry-leading expertise in surface drilling and hard-rock surface and underground mining.
- **Mining Services** – This division is a portfolio of specialised, lower capital intensity businesses who predominantly work with clients across the mining sector, to deliver value-add services that meet current and emerging needs.
- **idoba** – This division is technology informed services and products business who provide unique end to end digital, technology and consulting services designed to rethink, transform and disrupt the mining industry and beyond.

Perenti's organisational structure

We have three Divisions, supported by a corporate centre.



Our global presence



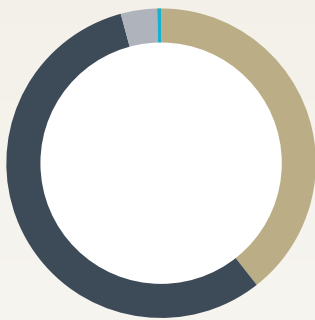
53
TOTAL
PROJECTS
GLOBALLY

90%
LOCAL
EMPLOYMENT

11%
GENDER
DIVERSITY
WOMEN

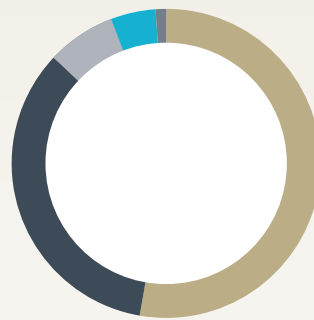
89%
GENDER
DIVERSITY
MEN

Employees by region (%)



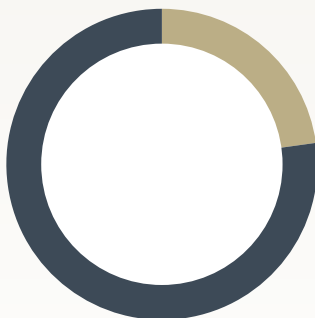
● Australia	39.4%
● Africa	56.4%
● North America	3.8%
● United Kingdom	0.4%

Contract type (% of workforce)



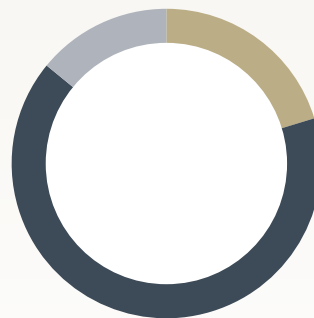
● Permanent	53%
● Fixed Term	34%
● Max Term	7%
● External Workforce	5%
● Casual	1%

Workforce employed under a collective bargaining agreement



● Covered	23%
● Not Covered	77%

Age Group



● <30 Years	20%
● 30-50 Years	66%
● >50 Years	14%

Our supply chain

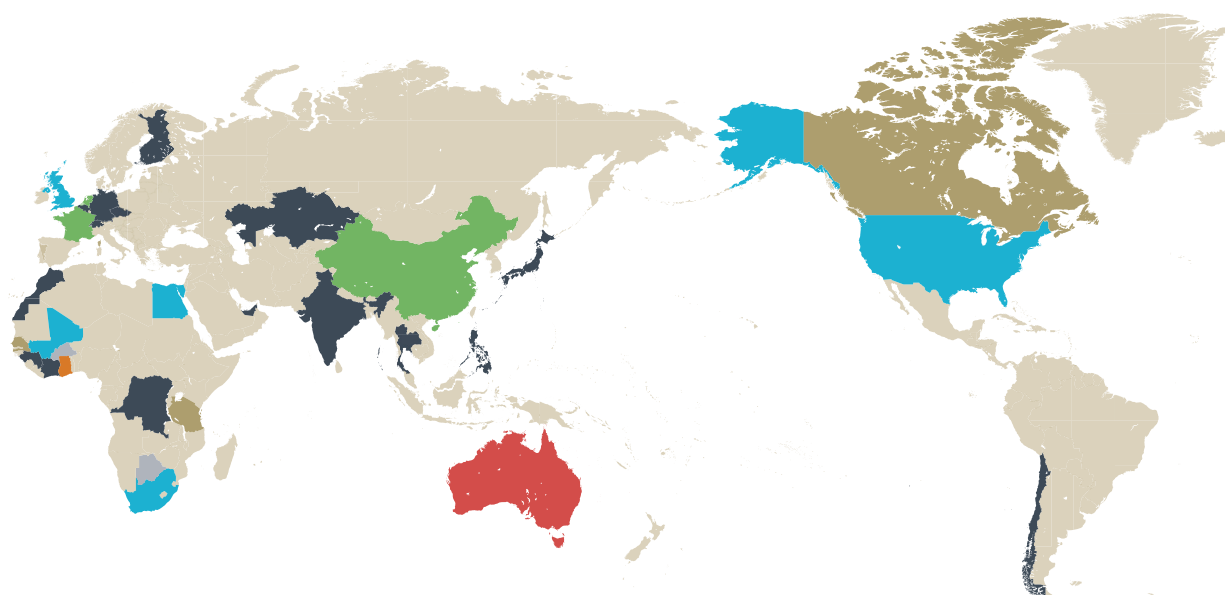
In FY23 Perenti had about 3400 active suppliers across 38 countries. The suppliers Perenti deals with directly (Tier 1) are predominantly located in the countries in which we operate, including Australia (50%), Ghana (18%), Botswana (10%), Burkina Faso (9%), Tanzania (5%), Senegal (3%) and Canada (3%); however, goods and services are occasionally sourced from other countries as required, including Mali, South Africa, United Kingdom, United States, Egypt, France, Dubai, Netherlands, China. Some of these countries are considered to have increased risk for incidents of modern slavery.

We procure goods and services from a range of industries, as follows:

Consumables	32%
Spare parts	25%
Heavy equipment	17%
Subcontractors	4%
Facility services	<1%
Information, communication and technology	<1%
Other supplies	21%

While most of our Tier 1 suppliers are located in countries with lower risk of modern slavery, Perenti recognises that suppliers will usually source their own goods from elsewhere, which presents additional modern slavery risks within the Company's supply chain. Perenti currently has limited visibility with respect to its suppliers beyond Tier 1 and is still developing its capacity to systematically identify and respond to modern slavery risks at Tier 2 and beyond.

Tier 1 global supplier locations



Supplier Count

● > 1500	● 10 - 100
● 500 - 1500	● 5 -10
● 100 - 500	● < 5
● 100 - 200	

Our approach

At Perenti, we believe that considering sustainability in everything we do is critical to deliver our purpose to create enduring value for all our stakeholders. Given the global prevalence of modern slavery and the nature of the mining industry, Perenti recognises that modern slavery practices likely occur in our value chain. Therefore, managing these risks is a key component of our commitment to sustainability.

Perenti seeks to align our business activities and practices with relevant international standards including the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Voluntary Principles on Security and Human Rights. We believe industry collaboration is essential to share learnings and provide consistency in managing modern slavery risks and have continued to play an active role in the Western Australian Human Rights Resource and Energy Collaborative Group across the industry.

An overview of how Perenti implements processes designed to prevent, identify, and respond to modern slavery issues is provided below.

Identifying and assessing modern slavery risks

Perenti has worked with an independent third party to undertake a risk assessment guided by the UNGPs to understand where human rights risks, including modern slavery risks, may exist within the business. A key part of the risk assessment was understanding the existing controls and identifying any potential gaps.

The assessment involved a desktop review of relevant corporate policies and procedures and information relating to the Company's operational footprint, inclusive of its supply chain. In addition, interviews and workshops were conducted with key personnel from across the business to ensure a cross-functional understanding and perspective of potential risks, and that existing controls and gaps were captured. Functions involved included: legal, supply/procurement, human resources, security, safety, environment, risk and sustainability.

The assessment found that the risks were largely dependent on location, with higher risks linked to complex operating environments, where there are greater safety and security issues, political unrest, and corruption.

Key modern slavery risks identified through the assessment included:

- **Labour** – Modern slavery risks are exacerbated in business models that rely on complex contracting and sub-contracting arrangements and where third parties are extensively used. While the majority of Perenti's workforce is directly employed (approximately 90%), labour hire services are used in some locations to source specific skill sets or local employees.
- **Procurement** – Perenti procures a range of goods and services from about 3,400 active suppliers. Key spend categories and services procured include utilities, tyres, professional services, spare parts, light vehicles, labour hire, heavy equipment, ground support, freight and logistics, explosives, consumables and equipment hire.
- **Business Relationships** – Perenti is typically engaged by mine operators to provide services and we therefore may be affected by the actions of our clients. Specific consideration was given to ensuring measures are in place to identify these potential risks, and explore ways to leverage the Company's relationship with its clients to manage risks, particularly in relation to water usage, waste disposal, health and safety, and community interactions.

Managing modern slavery risks

Governance

Perenti's Governance Framework plays a critical role in helping the business deliver on its strategy and objectives. It provides the structure through which business objectives are set, performance is monitored, and risks are managed.

Board and the Group Executive Committee

The risk that modern slavery practices may be present in Perenti's value chain is recognised throughout the Company, starting with the Board. Human rights risks, inclusive of modern slavery risks, are overseen by the Board Safety and Sustainability Committee. The Safety and Sustainability Committee is responsible for approving Perenti's reporting mechanisms and policies relating to modern slavery, requiring appropriate resources for effective modern slavery management and reviewing information on Perenti's modern slavery risk management approach and effectiveness.

The Chief People and Sustainability Officer is responsible for ensuring governance frameworks are in place to ensure modern slavery risks are assessed and managed throughout the Divisions. Accountability and implementation of our modern slavery prevention processes are allocated to relevant roles within the business.

Code of Conduct

Perenti's Code of Conduct (comprising a Code of Conduct Policy and Code of Conduct Booklet) describes how Directors and employees should conduct themselves to work together to fulfil Perenti's purpose and sets out the expected behaviours of Directors, employees, contractors, consultants and suppliers and agents. The Code of Conduct embodies Perenti's commitment to good corporate governance and responsible business practice and is included in the mandatory induction modules, and subsequently in refresher training.

Anti-bribery and Anti-Corruption Policy

We recognise that modern slavery can be linked with bribery. Perenti is committed to the highest standard of ethical conduct and regulatory compliance. Management authority is delegated through risk-based delegation of authorities; appropriate segregation of duties is in place and compliance risks form a key part of Perenti's broader risk framework. A training module on the Anti-Bribery and Anti-Corruption Policy is mandatory for employees in people leadership roles.

Our Speak up (Whistle-blower) Policy sets the expectation that all employees have a responsibility to help detect, prevent and report immediately instances of misconduct. Speak Up is an independently managed service that provides numerous avenues to confidentially report allegations of misconduct. Any material breaches of the Anti-Bribery and Anti-Corruption Policy are reported to the Board and Audit and Risk Committee.

Human Rights Policy

Perenti's Human Rights Policy provides guidance to directors, management, employees, contractors and suppliers on the Company's expectations regarding human rights, inclusive of modern slavery. Human Rights is also covered in Code of Conduct training and inductions for every employee.

Group Standards and Grievance Mechanisms

A key part of the PGF is the Group Standards which are controlled documents that describe important Group-wide frameworks and establish minimum and mandatory performance requirements in important areas. Three key Group Standards establish practices for managing modern slavery risks throughout the business:

- Sustainability Group Standard – sets approach to meet stakeholder expectations and manage sustainability-related risks, including human rights and modern slavery risks and response.
- Human Resources Group Standard – sets approach to human resource management within the business, inclusive of employment relations, onboarding and internal grievance management.
- Security, Emergency & Crisis Management Group Standard – sets the approach to security management, which aligns with the Voluntary Principles on Security and Human Rights.

An external grievance mechanism has been developed to standardise our approach across our entities. In FY24 the mechanism will be tailored to meet Divisional needs and implemented.

Labour

Perenti is committed to ensuring all employees and contractors are treated in a fair and ethical manner and can work in a safe and respectful work environment.

Employment practices

Across our varied employment jurisdictions, we work closely with the relevant governments, union representatives and employee groups to ensure adherence and compliance to the required labour laws, HR regulations and labour rights policies. In FY23 local employment in our international operations increased to 90% (from 89% in FY22).

New employees are provided with a contract of employment in the appropriate language containing approved terms and conditions and schedule of appointment in accordance with country legislation, as well as documentation outlining any applicable employment entitlements. If employees are covered by an industrial instrument they are also provided with a copy of the instrument. The business maintains governance procedures to ensure compliance with obligations outlined in all relevant collective bargaining agreements and awards, as well as applicable employee entitlements.

In addition to maintaining the required minimum labour regulations across the Group, we hold ourselves to a high standard of business policies related to Code of Conduct, Anti-bribery and Anti-corruption and Speak Up. These policies ensure all employees and contractors are aware of, and adhere to, practices that are ethical, fair and help create an environment free from harassment, discrimination, or victimisation. Employees and those employed via a labour hire service receive the same induction, which sets out an expectation that those employed, or otherwise engaged by Perenti adhere to the Company's Code of Conduct and other relevant corporate policies and procedures.

Labour hire services

Labour hire services are used in some locations to source specific skill sets or hire local employees, particularly in Africa. Our engagements with labour hire service providers are governed by internal standards and in compliance with each country's employment legislation, including:

- Adherence to minimum age of recruitment in the country
- No forced labour in our employment relationship with employees
- Freedom of association and the right to organise
- Equal remuneration for similar positions (i.e. pay scales for positions)
- Prevention and management of discrimination in the workplace.

Employee feedback mechanisms and disagreement management

Perenti seeks employee feedback through periodic culture surveys to measure how engaged people are in their work and the overall cultural health of the organisation. Outside of this process employees can raise concerns through internal grievance procedures or the Speak Up mechanism.

We are proud of our reputation and processes on workplace relations matters, evidenced by the lack of industrial disputes across our varied employment jurisdictions. In the event any of our businesses become subject to an employment disagreement, our experienced operations managers are able to manage these issues with the support of our local human resources teams and if necessary, our legal advisors, who are all well versed in the relevant laws and regulations of our host countries.

Procurement and Business Relationships

Perenti's procurement function consists of a range of supplier and market focused activities, which includes planning, sourcing and management of goods and services.

Supplier contracting and onboarding

Under Perenti's updated operating model, the Corporate Procurement function provides minimum requirements for procurement of goods and services by Divisions. The day-to-day management of supply and procurement is managed by the Divisional procurement teams.

Perenti is developing a Contracting Group Standard which will ensure we have formalised within the PGF that procurement of goods and services across the Group is conducted in accordance with relevant legal requirements, Perenti Group policies, and appropriate industry practice to achieve compliant, reliable and competitive procurement of goods and services. Divisions will review and, if necessary, update Divisional Procurement Standards to ensure alignment with the Contracting Group Standard.

The Contract Mining Division has anti-slavery and anti-human trafficking clauses in contracts with suppliers and standard purchase order terms and supply contracts. The Contract Mining Division also requires suppliers to complete self-assessment questionnaires for modern slavery when completing engagement with, and onboarding suppliers.

The Group Risk and Assurance function periodically undertakes internal audits of performance against contracting and onboarding requirements including adherence to internal modern slavery processes and the Sustainability Group Standard and contracting standards.

Supplier mapping, risk assessment and verification

Although modern slavery practices can occur in any country or industry, there are several factors that can increase the risk of modern slavery and therefore Perenti uses a risk profile tool to assess our Tier 1 suppliers based on their geographic location, value of spend and nature of the activities being undertaken. The tool enables us to take a risk-based approach to supplier management by using global indexes to consider the social, political, legal and economic factors of a country or region in combination with the risk profile of the supplier's industry. The tool helps identify suppliers on which to focus future audits. In FY23 we expanded the scope of the tool to categorise and assess additional regions and suppliers.

To support site audits of supplier facilities we have developed a supplier audit framework to verify supplier conformance with Perenti's policies and procedures, international good practice, and local regulation. The framework contains a general set of questions for all suppliers, as well as a more detailed set of questions for those considered high-risk. In FY23 Perenti commenced two site-level social audits of high-risk suppliers with the support of a specialist third party auditor. To support timely and effective response to audit findings we are finalising a response framework to be used if modern slavery practices are suspected to exist or identified in our supply chain.

Training

Perenti has developed a Human Rights Training Module in consultation with senior leaders and key individuals from across our entities. The aim of the module is to increase knowledge and understanding of human rights, inclusive of modern slavery, within the Company, and ensure there is clarity in how human rights risks are managed. The module will continue to be rolled out in FY24, and on an as needed basis.

Assessing effectiveness of modern slavery management at Perenti

Perenti regularly reviews its modern slavery management practices to maintain suitability and effectiveness. This is primarily done through scheduled governance system document review cycles, risk reviews and the assurance and compliance functions. The effectiveness of risk management and the system of internal control is verified through an assurance framework designed to target key risk areas.

Consultation

Perenti has consulted with the relevant personnel and entities in the preparation of the Statement. Meetings were held with relevant functional departments, including representatives from Perenti and Contract Mining. Discussions included progress on human rights and modern slavery management in the last financial year, the occurrence of any potential or identified human rights issues, and commitments going forward.

Approval

Perenti is committed to respecting human rights and managing modern slavery risks in accordance with this Statement.

Perenti did not find any evidence of modern slavery in our operations or supply chain in FY23. The Company recognises that the risks of modern slavery are complex and evolving and will continue to work to address these risks. This will involve actively engaging with stakeholders to assess the effectiveness of the identified actions to continually enhance the approach to management.

The Perenti Board of Directors authorised and approved the publication of this Statement on 6 December 2023.



Mark Norwell

Managing Director and Chief Executive Officer
Perenti



MODERN SLAVERY ACT STATEMENT FY23

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**Expect
More**

CORPORATE AND HEAD OFFICE

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