



RPMGlobal Holdings Limited

ACN 010 672 321

FY2024 Modern Slavery Statement for the financial year ending 30 June 2024

Reviewed by the Board on 6 December 2024



Introduction

The following statement is made in line with the *Modern Slavery Act 2018* (Cth) and the *Modern Slavery Act 2018* (NSW) by RPMGlobal Holdings Limited (**'RPM'** or the **'Company'**) with this Modern Slavery Statement (the **'Statement'**) applying to the Company and all its related subsidiaries and group companies. This Statement is made for the financial year ending 30 June 2024 (the **'Reporting Period'**).

This Statement outlines the steps RPM has taken during the Reporting Period to identify and address Modern Slavery risks in RPM's operations and supply chain.

RPM requires ethical and transparent labour practices and, consistent with these principles, takes a zero-tolerance approach to any form of Modern Slavery.

The Statement has been reviewed by the Board and a copy of the Statement is accessible to both the public and all officers and employees of the Company via the Company's website (available at www.rpmglobal.com) and via the Modern Slavery Statement Register (available at <https://modernslaveryregister.gov.au/>).

All enquiries or feedback should be directed to RPM's compliance team at companysecretary@rpmglobal.com.

Purpose

The Company is committed to protecting and advancing human dignity and human rights by managing the risk of Modern Slavery throughout its supply chain, domestic and international business practices and any other business relationships in accordance with all applicable laws, regulations and company policies.

RPM acknowledges the importance of transparency in connection with its procurement and supply chain processes and commercial functions across the globe as a publicly listed company (ASX:RUL). As a result, high ethical standards of business operation are held to account via RPM's policies.

The purpose of this Statement is to document RPM's continuing understanding and acknowledgement of the importance of the fundamental human rights contained in the *Universal Declaration of Human Rights 1948* ('UDHR'). The Company agrees that Modern Slavery is a serious violation of one's dignity and human rights and strives to eliminate exposure to such violations.

Company Structure, Operations and Supply Chains

Company Structure and Operations

As a publicly listed Company, RPM operates in a 'top-down' manner, placing the Board at the top of the organisation, mitigating the Company's risk and exposure to any wrongdoing. All subsidiaries within the RPM group are required to adhere to the same policies and procedures, including those relating to Modern Slavery assessment and management. The Company's internal risk mitigation functions work cohesively to ensure that its employees are aware of and continually focus and strive for complete adherence with all global policies and local laws that apply to them.

The RPM Board acts as the ultimate decision-maker with a carefully managed delegation of authority to management and matters reserved for the Board. Operationally, all employees report to the Company's Chief Executive Officer.

RPM's headquarters is in Brisbane, Australia. Operating offices in a number of locations across the world and working in over 125 countries, RPM's business consists of selling licensed Software and providing technology, and Advisory services to the Mining Industry. The table below indicates the location of RPM personnel worldwide including all RPM subsidiaries as at 30 June 2024.

RPM entity location	Approximate number of personnel
Australia	279
Brazil	2
Canada	29
Chile	10
China	6
Colombia	10
Hong Kong	1
Indonesia	18
Kazakhstan	2
Mongolia	6
Singapore	2
South Africa	28
Türkiye	2
United States	14

The majority of roles within the RPM business globally are performed by staff who are often tertiary educated and highly skilled in their specialty. All new hires undergo a screening process which, depending on role and location, includes right to work status, global sanction check, education and qualification, previous employment reference checks and criminal checks.

RPM currently employs 89.2% of its workforce on a full-time basis, 4.7% on a part time basis and 6.1% on a casual basis. All employee remuneration is in line with the awards and requirements relevant to the employee based on role and geographical location. In order to

meet the needs of RPM's clients, RPM engages subconsultants on subcontractor agreements which have been agreed between the parties and include sanction checking and compliance with RPM policies including the Modern Slavery policy.

Supply Chain

Considering the nature of RPM's business in software development and sales, consulting and training services, RPM procures services and products from a number of suppliers in order to deliver services to RPM's Clients. All RPM suppliers are required to comply with RPM's Supplier Code of Conduct. RPM continues to progress its in-depth analysis of its global supply chain to assess and manage Modern Slavery risks. So far, analysis has shown that the main categories of goods and services procured by RPM are located in Australia, Canada and the United States of America and include:

- Accommodation and travel
- Office facilities management
- Information technology hardware services and software including cloud services, printer, phones, computer hardware, software and network equipment;
- Business services including stationary, postal services, courier, office furniture, office fit out; and
- Specialist subconsultant services aligned with RPM's business offerings.

As part of RPM's supplier mapping and assessment, RPM continues to work to categorise its suppliers in accordance with geographical location, industry category, and spend amount to determine appropriate risk ratings. Consideration of supplier commitment to modern anti-slavery is also considered as part of the risk assessment process, including whether the supplier enacts and publishes its own modern-anti slavery statement and policies.

Modern Slavery Risk Identification and Management

RPM acknowledges that risk is inherent in all aspects of its business operations and being able to effectively recognise and manage risks and opportunities is critical to success. The RPM Board has an established Audit and Risk Committee which is tasked with the responsibility of ensuring that risks relevant to RPM are appropriately identified and managed. This financial year, RPM's Board reviewed and updated its company-wide Risk Management Framework. ESG aspects (including Modern Slavery) are identified by the RPM Board as an area of risk, requiring control and management.

RPM's operations and supply chain are made up of businesses that operate in a variety of industries and regions around the globe. RPM acknowledges that its Modern Slavery risk in RPM's operations and supply chains may be heightened due to RPM's operational footprint and

the geographical location of some suppliers. RPM also recognises that visibility in certain overseas markets can be limited, which carries additional Modern Slavery risks. Because of this RPM strives to actively engage with its suppliers and proactively seeks to increase the level of visibility of the origin of goods and services procured by RPM.

Operations

RPM currently identifies Modern Slavery risk in RPM's operations as low, given RPM's operations relate to provision of professional services and software development. RPM's operations mostly involve highly skilled work conducted by educated professionals directly employed by us and RPM implements and requires compliance with RPM's rigorous Code of Conduct and suite of policies and procedures, including those relating to RPM values and ethical conduct. In line with the '*United Nations Guiding Principles on Business and Human Rights*', all Company employees are engaged on terms and conditions which comply with Australian and relevant local laws to ensure they are not put at risk of any Modern Slavery throughout their employment term.

However, given the global nature of its business, RPM recognises some elevation in risk profile for particular elements within its operations, including that some of RPM's subsidiary entities operate in higher risk countries (with reference to the Global Slavery index).

Supply Chain

Whilst the majority of the Company's first-tier suppliers are based in Australia and operate in lower risk industries, such as professional services, RPM recognises that supply chains are complex and often involve a number of indirect inputs. RPM considers that the risk of Modern Slavery in its direct suppliers is likely to be low. Despite this, initial high level investigations have identified some supply chain areas that may have an elevated risk profile including direct suppliers based in high risk countries, domestic suppliers to RPM subsidiaries based in higher risk locations (Turkey, China, Indonesia), and local suppliers operating in high risk industries such as facilities management, cleaning and food services including catering.

RPM remains committed to ongoing assessment of its supply chain with increased focus and scrutiny on suppliers identified as high risk, including those located in geographical areas of higher risk, suppliers of goods and services identified by the Global Slavery Index as being high risk or where there has been recorded potential exposure to Modern Slavery. All suppliers regardless of their location are required to comply with RPM's Supplier Code of Conduct.

Actions taken by RPM to assess and address Modern Slavery risks

Whilst the FY24 Reporting Period represents the first time that RPM has had a mandatory obligation to report under the *Modern Slavery Act 2018*, RPM has reported on a voluntary basis

since June 2020. RPM's approach to Modern Slavery is group-wide and the RPM Board of Directors are committed to ensuring RPM continues to take action to assess and address Modern Slavery in its operations and supply chain.

During the previous Reporting Period, RPM established an ESG and Sustainability sub-committee to assist the RPM Board in discharging responsibilities relating to ESG and Sustainability within the RPM group including in respect of Modern Slavery related risks. During the current Reporting Period the committee met twice and the ESG and Sustainability Charter, which governs the committee was reviewed and updated.

At the end of the FY23 Reporting Period RPM engaged a third party ESG and Sustainability specialist firm to assist it with materiality assessments and the development of an ESG strategy including in respect of Modern Slavery related risks. During the current Reporting Period, RPM engaged in numerous strategy workshop sessions with the third party firm and internal stakeholders from differing geographical locations, business functions, and seniority levels to select indicators, targets, and action planning regarding ESG Material issues, which included Modern Slavery-related risks.

RPM continues work on its ESG Strategy, including the development of measurable actions to be taken in relation to assessing and addressing Modern Slavery related risks in its operations and supply chain.

During the current Reporting Period, RPM commenced preparation of a Moderns Slavery risk assessment document for supplier onboarding, to be integrated as a part of the broader supplier onboarding system within RPM.

RPM started tracking reports of Modern Slavery within its operations and reports made directly to RPM regarding Moderns Slavery within its supply chain.

RPM continues to require new employees to undertake a thorough induction program, which includes, as part of the legal induction, information regarding Modern Slavery and RPM's approach to assessing and addressing Modern Slavery within its business. RPM still plans to increase the depth of its Modern Slavery training and induction to ensure that all RPM have increased knowledge of the RPM Modern Slavery policy, how to report suspected Modern Slavery and the RPM remediation responses. During the Reporting Period work commenced on preparation of the elements of the training module RPM plans to require employees to complete.

The Company implemented a Whistleblower Policy in July 2019 to set out a pathway for grievance and remedial processes. It ensures that any person who is to report or raise concerns regarding serious wrongdoing or unethical conduct will be treated fairly without detriment. The

RPM induction program also educates RPM employees on the Whistleblower Policy and encourages staff to report any suspected Modern Slavery by using the procedure set out in this policy.

A number of processes relating to governance and compliance have been implemented to assist in RPM's mitigation of its exposure to Modern Slavery.

The Company first published a global Modern Anti-Slavery Policy in July 2019, reviewed annually, which applies to all persons working for or on behalf of RPM in any capacity, and includes employees, directors, officers, contractors, subcontractors, and any other third parties that deal with RPM. The Policy sets out to maintain and improve current business practices within RPM's scope to prevent Modern Slavery. The policy is reviewed, updated and signed off by the RPM Board annually.

On July 2019, RPM also implemented a Supplier Code of Conduct, which is reviewed annually, which establishes the minimum standard of behaviour that is expected of any suppliers, contractors, subcontractors, partners and any other third parties that deal with the Company. RPM complies fully with the content and spirit of all laws, legislation and regulations which govern the Company and its operations, business environment and employment practices. This Supplier Code of Conduct ensures Suppliers adhere to the same compliance standard as RPM in that they conduct themselves, their business operations, relationships, practices and sourcing in a lawful and ethical manner. The Supplier Code of Conduct is reviewed and updated annually as part of RPM's rigorous corporate governance process.

In April 2020, RPM first commenced voluntary reporting by publishing its first Modern Slavery Statement on the Online Register of Modern Slavery Statements, which is available to read [here](#). RPM has continued to voluntarily report annually with the reports available here [here](#)).

RPM continues to ensure that a Modern Slavery clause remains in its standard Terms and Conditions for all global Advisory Services Framework Agreements and Proposals, to ensure that any work commencing under such Agreement type will be subject to the compliance of Anti-Slavery practices by both parties. RPM also has placed emphasis on ensuring that during contractual negotiations that Modern Slavery clauses are included in contracts that RPM agrees to for services and software.

During the FY23 Reporting Period RPM agreed to commence a process of supplier mapping based on key factors identified as creating a Modern Slavery risk, including geographical risk, product/service risk, and industry risk, based on information contained in the Global Slavery Index 2018. During the current Reporting Period, RPM continued to assess our supply chain and categorise supplier risk in relation to Modern Slavery, including the creation of a risk register categorising those entities assessed from Low to High risk. RPM intends on continuing to

complete risk assessments of current suppliers, and include, as part of its supplier onboarding, an assessment of Modern Slavery risks and actions being taken by new suppliers to address Modern Slavery.

Assessment of the effectiveness of actions taken by RPM to assess and address Modern Slavery risks

RPM's focus during the Reporting Period has been to continue assessment of its supply chain to obtain a better understanding of RPM's Modern Slavery risks and how such risks may present in the Company's operations and supply chain. Although still at an early stage of progress in this area, RPM's engagement of a third party to assist with its identification of most material ESG and sustainability issues and establishment of targets and actions for these areas has allowed RPM to obtain a more focused and contextual view of its Modern Slavery risks and how they can be managed and mitigated. RPM will continue to work on developing processes and frameworks to review the effectiveness of actions RPM takes to assess and address the Modern Slavery risks in its operations and supply chains. In addition to the actions identified above, RPM's plan is to undertake the following:

- Continue to undertake periodic reviews of its Modern Slavery, Whistleblower, Code of Conduct and other relevant policies to ensure they remain current and adequately address the risk of Modern Slavery;
- Prepare and roll out a questionnaire for suppliers which will include Modern Slavery related questions for inclusion in the risk assessment of each supplier;
- Prepare and roll out mandatory modern slavery awareness training;
- Commence a process of development of Key Performance Indicators to measure how effective our actions to identify and address modern slavery have been. These may include for example, the percentage of contracts signed that include modern slavery clauses, number of suppliers completing Modern Slavery supplier onboarding and completion rates for mandatory modern slavery training.

The Company is determined that it will be able to conduct further risk identification for higher risk countries, product categories and supply chains in the next Reporting Period. For existing suppliers, RPM will embed ongoing due diligence and oversight of Modern Slavery risks in standard supplier management processes.

Consultation with RPM subsidiaries

RPM's Corporate Governance Framework, which includes RPM's risk management process, internal policies and procedures (including RPM's Modern Slavery policy and tools through which Modern Slavery risks are identified, assessed and managed) is implemented using a 'top down' approach from the Board to all RPM staff across RPM's global entities. This Statement

has been prepared with input from, and in consultation with key business areas across the RPM group, including those responsible for procurement, supply chains, risk, legal, the RPM General Counsel and Executive General Manager of Human Resources, who are responsible for the overarching risk management in this area for the entire global operation of RPM and supply chains.

RPM subsidiaries are wholly owned by RPM and given that RPM and the subsidiaries operate within the same industry and business sector, in accordance with the same policies and procedures, and within the framework of the same legal, human resource and procurement teams, at this time RPM considers that the consultation undertaken within the RPM group is appropriate for the purposes of developing this Statement.

The Statement has been approved by RPM's Board of Directors.

RPM Commitment to Ongoing Monitoring

RPM is committed to continuing its actions to understand, manage and mitigate the risk of Modern Slavery in its operations and supply chain.

RPM will continue to review and update its policies, practices and procedures, as required, to maintain appropriate safeguards against instances of Modern Slavery within its business.

Approved by the Board of RPM 6 December 2024.



Chairman

RPMGlobal Holdings Ltd