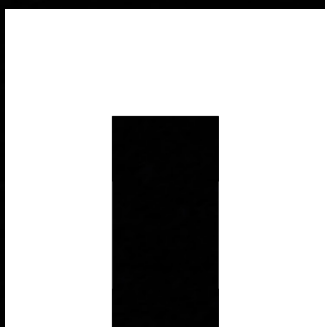


Modern Slavery Statement 2019-2020



NEPEAN

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About this statement

NEPEAN recognises that human trafficking and slavery is not always immediately apparent and visible and can take many forms. NEPEAN is fully committed to providing and adhering to the highest ethical standards across its domestic and global divisions and across its various workplaces. Modern Slavery is unacceptable and will not be tolerated across or within NEPEAN'S divisions or area of operations, including its Supply Chains. Human Rights in all of its forms, must be respected and as a global organisation, NEPEAN considers itself that it has duty to safeguard the rights of others, free from servitude and from other forms of abuse.

This is NEPEAN's first statement and covers the 2019-2020 period. The purpose of which is to outline NEPEAN's approach to tackling Modern Slavery within its operations and supply chains and to demonstrate that NEPEAN has robust frameworks and processes in place to both educate against, raise awareness for and minimise the risk of, modern slavery occurring.

This statement was approved by Miles William Fuller as sole Director of NEPEAN No. 1 Pty Limited ACN 606 791 931 for CONV Australia Holding Pty Limited ACN 620 359 382 and Ronald E Graham (Holdings) Pty Limited ACN 000 363 477 for the period covered by this statement on the 29th March 2021. All references throughout this statement to NEPEAN are references to the NEPEAN portfolio of companies, its subsidiaries and related entities. This statement does not cover any non-controlled joint venture operations.



Miles Fuller
Director, Chief Executive Officer and Executive Chairman

About NEPEAN

NEPEAN is Australia's leading privately owned engineering, mining services and industrial manufacturing organisation which delivers high value, innovative and sustainable solutions for the world's leading mining, construction and transport companies. NEPEAN employs over 1,400 people across 5 continents and operates in Australia, the USA, Canada, Europe, Africa, Asia, New Zealand and South America.

NEPEAN operates globally through a portfolio of national and international companies across its various locations by broadly providing specialist manufacturing and supply capabilities to the mining services, building products and engineering sectors.

STRUCTURE & OPERATIONS

Conveyor Systems and Components

Our businesses involved with the manufacture and supply of conveyor systems and components operate through our NEPEAN Conveyors, PROK, Gurtec and Roxon entities based in South America, Canada, United States, Indonesia, South Africa, Sweden, Finland and Germany as well as more locally in Mackay, Wollongong, Perth, Pilbara, Gosford and Gulgong.

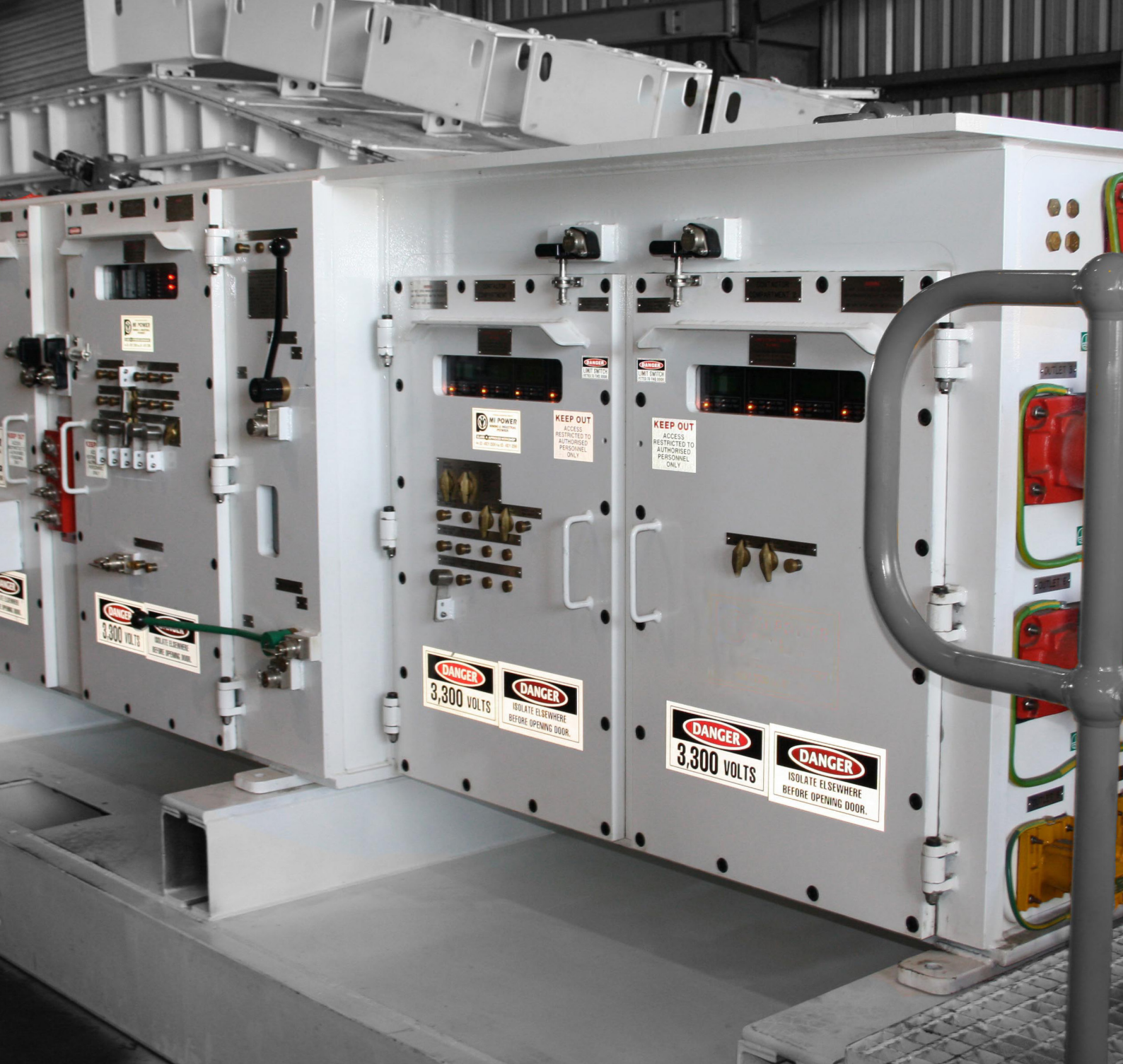


Longwall Equipment & Systems

Our mining longwall business operating from Rutherford NSW and MacKay QLD concentrates on the design and construction of underground longwall mining equipment under our NEPEAN Longwall Pty Ltd entity including equipment and systems such as:

- Armoured Face Conveyors
- Powered Roof Supports
- Electro-Hydraulic and Chain Driven Conveyors
- Crushers; and
- Longwall System Packages





Electrical Components and Equipment

Our NEPEAN Power Pty Ltd entity operates from Thornton NSW and is focused on the supply and manufacture of:

- Power Supply Devices
- Substations
- Power & Electronic Device Services
- High Voltage Switchgear
- Switchrooms
- Control & Protection Devices
- Distribution Control Boxes; and
- Surface Methane Plant Management Services.



Building Products and Services

Our business includes the manufacturing, supply & galvanising of metal products through our entities of Weldlok, Galserv and Galintel for the architectural, civil, construction and industrial markets operating from Yagoona, Coffs Harbour, Mackay, Brisbane, Perth & Melbourne:

- Industrial Access Systems
- Drainage Products
- Expanded and Perforated metal sheets
- Lintels
- Retaining Wall Systems

Engineering Services

Our engineering operations undertaken by NEPEAN Engineering & Innovation Pty Ltd provides specialist engineering services to the mining, manufacturing, infrastructure, scientific, defence, aerospace and pharmaceutical sectors from Narellan NSW . Our specialties include:

- Surface & Spherical Grinding
- EDM Wire Cutting
- Heavy & Light Metal Fabrication
- Laser Cutting, Profile Cutting, Surface Treatment & Assembly
- Precision Inspection
- Design & Engineering
- Special Machines
- CNC Machining
- CNC Boring



Supply Chain

Our supply chain across our areas of operation consists of a mixture of NSW, QLD, WA and VIC based suppliers as well as internationally from regions including Africa, Asia and the Pacific, Europe & Central Asia and the Americas. Broadly our suppliers cut across various industries and comprise of the following products and services:

- Belts and related monitoring systems
- Electrical components such as switches, gear boxes, motors and mechanical drives
- Pulleys and Idlers
- Steel
- Hydraulics equipment
- Winding equipment
- Magnet systems
- Roof supports and structures
- Coal clearance systems and associated structures
- Chains
- Handrails
- Gratings and wire mesh
- Fasteners
- Nuts and bolts
- Purlins
- Lintels
- Wearliners



OUR APPROACH

Human Resources

NEPEAN has formal policies in place intended to promote ethical and legal business conduct. All new employees upon induction into procurement roles receive initial and ongoing awareness training as to the issue and effects of Modern Slavery within the workplace together with NEPEAN's policies and approach taken to minimise the effects of modern slavery occurring. For existing employees from NEPEAN's executive team downwards, employees receive Modern Slavery awareness training, which is on-going and continually assessed.

Our guiding principles are underpinned by the United Nations Guiding Principles on Business & Human Rights, Universal Declaration of Human Rights and the International Labour Organisation's Declaration of Fundamental Principles and Rights at Work.

Speak Up

We have also introduced a confidential Speak Up reporting system within our operations and have appointed a dedicated Modern Slavery Complaints Officer, specifically tasked with the receiving and investigation of Modern Slavery suspected incidents or occurrences. Our Organisation's Declaration of Fundamental Principles and Rights at Work.

Supplier Due Diligence

Our Commercial, Project & Finance teams carry out a range of supplier due diligence including issuing onboarding questionnaires, carrying out desktop assessments, visiting suppliers on site (subject to local COVID-19 restrictions and related health advice) as well as holding discussions with suppliers as to what measures they are taking within their supply chains in order to combat Modern Slavery.



Contracting

Our standard terms and conditions, conditions of sale together with our main supply and purchase agreements have been updated to require our suppliers and customers to acknowledge that they have no knowledge of any Modern Slavery offences currently occurring within their organisation or supply chain and will take steps to address any issues arising throughout the life of the contract and in their supply chain generally.

Risk Assessment

Across the portfolio, each General Manager across our various business units (which includes our subsidiaries and related entities) undertook a supplier geographical & contract value based risk identification process which graded suppliers according to regions based upon the Global Slavery Index Walk Free Foundation Regional Prevalence & Vulnerability Data Index. We also took into consideration other factors including the sector and type of industry those suppliers operate within.

This process enabled us to identify and consider risks that may possibly cause or contribute to modern slavery practices along with the type of industry and type of products and services being supplied. Our assessment criteria enabled us to classify our suppliers as being at Minor through to Low, Moderate, High and Extreme Risk. The outcome of the assessment assists with our prioritisation and implementation of our supplier engagement.





COVID-19

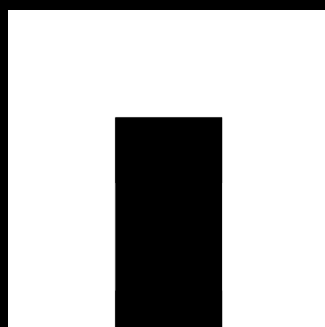
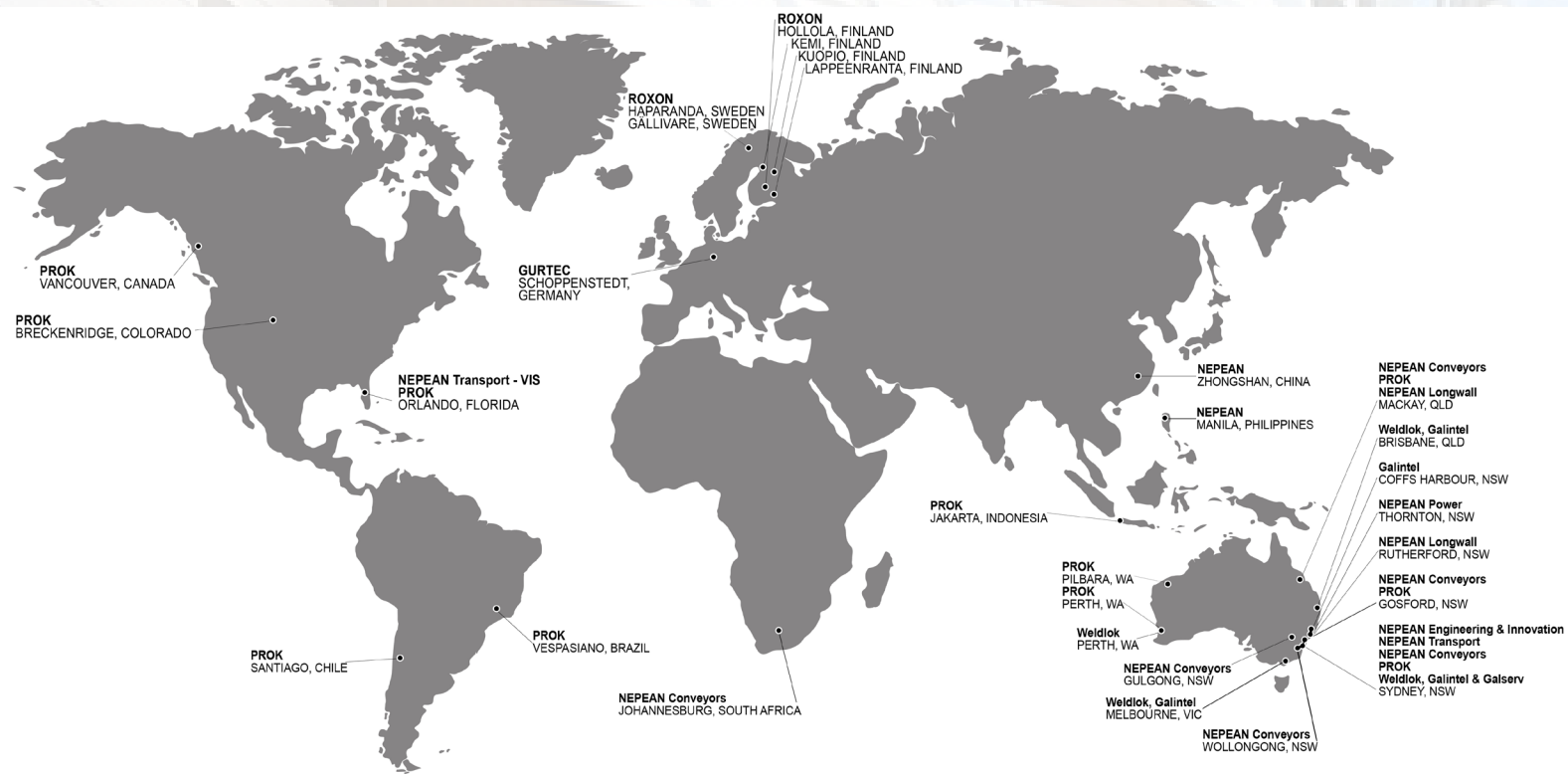
The introduction and impact of the Sars-CoV-2 Virus on both domestic and global economies have been devastating and whilst unprecedented, have effectively brought carnage and major disruption and disconnection to industry, regions and families alike – asserting novel and increased pressure upon existing domestic & overseas supply lines. From this perspective, we recognise that there is an ever increasing risk of Modern Slavery occurrences being committed throughout local and international supply chains, as industry and governments continue to battle with the disruptive effects of the virus.

Despite such dislocation, we have focussed upon our internal and external relationships and utilised our investment of modern technology to find new ways of engaging with our customers and suppliers. This has enabled us to build and maintain relationships and to obtain greater transparency and visibility of our suppliers and how they do business through both local and international live video contract negotiations and purchase ordering.

The effects of the pandemic has meant that we have not been able to hold face to face training for our various procurement teams and instead, we implemented an on-line training program through our dedicated learning hub where both managers and procurement teams can undertake the course remotely from their work stations or at home.

ONGOING REVIEW & FUTURE GOALS

Our response to Covid-19 will be on-going and subject to further monitoring including the upgrading of our supplier assessments and questionnaires. Our Modern Slavery Policy will be reviewed annually and updated where necessary, including the updating of our contractual terms and conditions. Any complaints brought to our attention will be investigated and where necessary, further action taken. Our complaints and reporting processes and procedures will be reviewed together with our remediation protocols and amended or updated as necessary. Our e-training education will continue to be available and will be updated as necessary with a view to the expansion and accessibility of it to all staff globally.



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