



Elastomers Australia Modern Slavery Statement

For the Financial Year ended 30 June 2025

A message from the General Manager of Elastomers Australia

In compliance with the Australian *Modern Slavery Act 2018 (Cth) (the Act)*, Elastomers Australia is proud to present its FY2025 Modern Slavery Statement.

Elastomers Australia continues our strong commitment to addressing and mitigating modern slavery risks within our operations and supply chains, and the actions we are taking to progress our journey.

Since the last reporting period, Elastomers Australia has undertaken the following actions;

- Continuation of policy implementation to support our Modern Slavery framework
- Continued education and awareness of our workforce, including training on the policies supporting the Modern Slavery framework
- Individual risk assessments have been conducted for suppliers operating in, or sourcing goods from, countries identified as higher risk in the Broad-Brush Risk Assessment of Elastomers Australia's top ten suppliers by expenditure.
- Monitoring of the effectiveness of our actions through training completion rates

Modern slavery constitutes a violation of human rights and encompasses serious crimes such as human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting. Elastomers Australia is committed to upholding and respecting the human rights of all individuals involved in our operations, supply chain, and the communities in which we operate. We maintain a zero-tolerance approach to any form of modern slavery or human rights abuses within our value chain and are dedicated to identifying and eradicating any instances or risks from our operations and broader supply chain.

Elastomers Australia is committed to acting ethically and with integrity in all our business dealings and relationships by implementing and enforcing effective systems and controls to prevent modern slavery within our own business operations and in our supply chains.

Elastomers Australia also understands that the key to eradicating this complex issue is to set clear expectations for our people and suppliers, which will alert us to potential involvement in modern slavery and empower us to take steps to address it and to prevent such involvement in the future.

Paul Lane

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General Manager Operations

Approved by the Board on: 22nd October 2025

1. Reporting Entity

Criteria 1

This modern slavery statement is made by Lettela Pty Ltd (ACN 005 572 305) as trustee for the RJ Letten Property Trust trading as Elastomers Australia for the period 1 July 2024 to 30 June 2025, pursuant to the Australian *Modern Slavery Act (2018)* and was approved by the Board of Directors on 22nd October 2025

The Act requires entities over the \$100 million annual consolidated revenue threshold that are either classed as an Australian entity or a foreign entity carrying out business in Australia during the reporting period to publish a statement on actions taken to identify and manage modern slavery risk. This statement covers the reporting period from 1 July 2024 to 30 June 2025.

2. Structure, Operations & Supply Chains

Criteria 2 & 6

Structure and Operations:

Elastomers Australia is an Australian owned and family-operated company, with over 40 years' experience providing specialised screening solutions to the mining and mineral processing industries. It is the number one screen media supplier in Australia, having majority of the market share across the coal, iron ore, gold and other mineral markets. Our range of specialist screen media products are manufactured locally utilising various techniques and processes from an innovative range of raw materials to help produce the most cost-effective outcomes for our customers.

Screen media goods encompass the following:

1. Panels (of specific height, width & length dimensions) that are designed to allow ore particles to be separated into size, and
2. Fixtures that lock in the panels to the screen machines to prevent dislodgement during the screening process.

Screen Media Services include undertaking maintenance of customer sites, through identification of screen media goods that require removal and installation of new parts.

Elastomers Australia has local service, manufacturing and store facilities and branches located nationally in the major mining regions. Our main manufacturing plants are located in Melbourne (VIC) and are supported by our branches and warehouses in Singleton (NSW), Mackay (QLD), Emerald (QLD) and Perth (WA). While we operate solely within Australia, we also have local and overseas customers.

Supply Chain:

Elastomers' supply chain encompasses approximately 251 suppliers. The top 10 suppliers spend equals \$42.8m per annum, and 77% of the total spend is on raw materials and consumables. 99% of the total spend encompasses our Australian suppliers.

The top spend categories for FY25 were:

- Stainless Steel & Chroming;
- Polyurethanes;
- Rubber;
- Freight, and
- Workforce labour hire.

3. Modern Slavery

Criteria 3, 4, 5

This statement marks the continuation of Elastomers Australia's journey to understanding modern slavery risks and highlighting what role our business plays to detect and support victims of modern slavery.

Elastomers Australia has available external consultants to help the business understand the issue of modern slavery and enhance our organisation's identification and mitigation of modern slavery risk when needed.

Operations:

Elastomers workers fall into two categories:

- Employees - employed directly under permanent, part-time, or casual agreements.
- Contractors - engaged through Australian labour hire companies.

Elastomers Australia's Human Resources department regularly monitors award rates and changes to legislative requirements, including the National Employment Standards, to ensure that staff receive benefits above the minimum requirements. Manufacturing staff in Victoria are covered by an Enterprise Agreement and all other staff are on individual employment contracts.

There is greater risk for modern slavery in instances where contractors and sub-contractors are engaged through third parties. To combat this heightened risk, Elastomers Australia's pre-approval process for contractors involves ensuring the company carries a labour hire license where applicable, is abiding by the terms and conditions of the engagement contract, and ensuring employees are meeting minimum entitlements. Further, when engaging with labour hire agencies, Elastomers Australia incorporates checks in our recruitment process to ensure we have cross-referenced working rights.

It should be noted that all personnel directly working for Elastomers Australia undergo an induction process that includes education on modern slavery risks and whistleblower processes.

Supply Chain:

Approximately 99.4% of Elastomers' suppliers are located in Australia, therefore there is a presumed lower associated risk within our tier one supply chain.

Based on the Global Slavery Index, Australia is considered to be low risk, however, we recognise that there is a risk that Elastomers Australia may be directly linked to modern slavery through our wider supply chain.

Based on a high-level review of our supplier relationships, we believe raw materials such as stainless steel, natural rubber and polyurethane may be high risk as 95% of our total FY25 spend was in these categories. We understand that these raw materials are sourced from Asia, India and China. These locations and material parts have been identified as carrying a higher risk of modern slavery.

Through the current risk mitigation process, Elastomers Australia has identified the areas of risk relating to lack of visibility in certain overseas markets. This carries additional risks of modern slavery especially in secondary levels of our chain of suppliers and source materials used in our group's goods and services. Further investigation and understanding of their supply chain partners is currently underway through a risk management process to assess areas of vulnerability in our supply chains and to understand, identify and control any risks we may encounter. Further clarification of these potential risks will be ascertained through communications with our primary suppliers as well as the actions from individual risk assessments arising from the Elastomers Australia Broad Brush Risk Assessment of our top 10 suppliers.

4. Call to Action – FY 2024/2025

Policies & Governance:

Elastomers Australia has maintained a modern slavery framework which outlines the key actions, deliverables, and accountabilities of Elastomers Australia in relation to identifying and mitigating the risk of modern slavery. This framework is monitored and reviewed by our Critical Risk Management Team to ensure ongoing assessment and improvements. The Critical Risk Management Team is responsible for identifying any risks within the business including modern slavery, and is comprised of the General Manager of Operations, Business Risk and Compliance Manager, Human Resources Manager, Commercial Business Manager, IT and Systems Manager, Financial Controller, Contracts Manager and a Director of Elastomers Australia.

Further supporting the modern slavery framework, Elastomers Australia has developed a Supplier Code of Conduct Policy.

Training & Awareness

Improving awareness is a critical step in identifying and addressing modern slavery risks. Any individual engaged by Elastomers to perform work as an employee or contractor is required to undergo a Company induction. As part of the Company induction the following is reviewed by each individual with a sign off of their commitment:

- Previous year's Modern Slavery Statement
- Modern Slavery Training presentation
- Human Rights Policy
- Business Integrity Policy
- Code of Conduct

Training on our policies, procedures and processes is conducted on a yearly basis via our online Human Resources Information System (HRIS) to ensure staff are reminded of their obligations relating to corporate governance. A total of 97% of Elastomers Australia employees assigned to our modern slavery training have successfully completed the program.

Operational Risk Assessment

During the FY 2025 reporting period Elastomers Australia undertook individualised risk assessments on suppliers that were identified through the Broad-Brush Risk Assessment on the Top 10 suppliers by spend who operated in countries identified as high risk. Elastomers Australia has started to conduct Supplier Due Diligence during this period and exploring modern slavery risks from the perspectives of these suppliers and will continue this throughout FY 2026.

Reporting & Remediation

We maintain a confidential process where employees, suppliers, customers, and any other stakeholder can report instances of actual or suspected unethical or unlawful conduct.

Concerns are reported through our Chain of Command and matters are dealt with by the Human Resources department and the General Manager. Any risks are reported to the regulator if required.

Training & Education

Internally Elastomers Australia developed a document for Domain considerations for modern slavery risks for each Senior Manager.

Externally we will continue the process of educating Elastomers Australia's suppliers and the wider supply chain through communication and information gathering exercises to ensure our suppliers practice responsible and ethical business practices and sourcing, and the implementation of a Supplier Code of Conduct.

Effectiveness of the actions

During this reporting period, Elastomers Australia has continued to work on developing frameworks and processes to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains.

5. Looking Forward & Continuous Improvement

Elastomers Australia is committed to continuously improving its approach to addressing modern slavery risk in its operations and supply chain. We will continue to build on the work completed during this reporting year and further progress our actions.

In FY 2026, Elastomers Australia will focus on the following actions:

Risk Management

- Continuation of risk assessing our supply chain
- Begin developing processes to gain an understanding of our Tier 2 suppliers

Training and Education

- Review of our current training presentation and update to reflect Elastomers Australia's growth in this area
- Following discussions and feedback from Tier1 suppliers, develop a Q&A sheet when gathering data off our suppliers
- Release the recently developed Supplier Code of Conduct to our suppliers with written acknowledgement of acceptance

Measuring the Effectiveness of Actions

As Elastomers Australia further develop processes for information gathering/reporting and establishment into the business modelling of Elastomers Australia we will begin the development of KPIs to measure performance in relation to Modern Slavery, these KPIs will measure the following criteria:

- Identify and Assessment of Risk (Criteria 3 & 4)
- Actions to Address Risk (Criteria 4)
- Remediation Processes (Criteria 5)
- Training & Capacity Building (Criteria 4)
- Effectiveness Assessment (Criteria 6)
- Transparency & Reporting (Criteria 7)

6. Approval

This statement was approved by the Board of the trustee (principal governing body) for RJ Letten Trust on 22nd October 2025

This statement was approved and signed by Georgia Letten as a Director of the Trustee for the RJ Letten Trust.

A handwritten signature in black ink, appearing to be "G. Letten", written in a cursive style.

Georgia Letten

Director

Trustee – Lettela Pty LTd

Date: 2/12/2025