

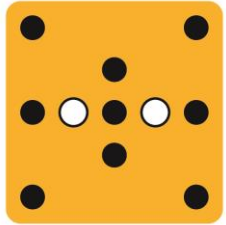
**BYRNECUT**

**BYRNECUT GROUP  
MODERN SLAVERY  
STATEMENT FY20**

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**15 June 2021**





# MODERN SLAVERY GROUP STATEMENT FY20

## BYRNECUT

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# 1. BYRNECUT GROUP - OVERVIEW

## Reporting Criteria #1 – Modern Slavery Group Statement

- This statement is made under the *Modern Slavery Act 2018* (Cth) for the period ending 31 December 2020.
- This is a joint statement published on behalf of the Byrnecut Group comprised of:
  - Byrnecut Australia Pty Ltd (including Raising Australia and BOAB)
  - Jetcrete Oz Pty Ltd
  - Murray Engineering Pty Ltd
  - Quattro Project Engineering Pty Ltd
  - Mining Plus Pty Ltd
  - SRO Group Pty Ltd
  - Byrnecut Offshore Pty Ltd
  - Sano Health Pty Ltd
- The Byrnecut Group operates throughout Australia, North and South America, Africa, Asia and Europe.
- This statement details the steps the Byrnecut Group has taken to assess modern slavery risks within its operations and supply chains, and the actions taken to manage those risks.

# 1. BYRNECUT GROUP – OVERVIEW (cont.)

## Reporting Criteria #2 – The Byrnegcut Group

The Byrnegcut Group is one of the largest providers of mining services in Australia and overseas.

Byrnegcut Group is headquartered in Perth, Western Australia and has a workforce of 5075 employees.

- **Byrnegcut Australia Pty Ltd** specialises in hard rock underground contract mining.
- **Jetcrete Oz Pty Ltd** is a shotcreting business providing a complete service for all stages of underground shotcreting, remote shaft lining, concrete manufacture, surface and underground civil infrastructure.
- **Raising Australia** is a specialist raise drilling company which has a fleet of raise drills for the mechanised development of accurate vertical and sub-vertical raises.
- **Quattro Project Engineering Pty Ltd** is a project engineering business providing turnkey solutions for the delivery of surface infrastructure and mining related projects.
- **Byrnegcut Offshore Pty Ltd** provides underground mining contract services internationally.
- **Mining Plus Pty Ltd** is a consultancy business offering expertise in mining engineering, geology and geotechnical engineering.
- **Murray Engineering Pty Ltd** is an engineering business providing mechanical and electrical goods and services to all areas of industry. It specialises in maintenance, refurbishment, construction and manufacture.
- **SRO Group Pty Ltd** is a manufacturing business which supplies electrical engineering solutions combined with mechanical engineering and fabrication services.
- **BOAB (Building Opportunities for Aboriginal Business)** is an indigenous training business which increases indigenous training and employment outcomes through commercial engagement.
- **Sano Health Pty Ltd** offers workplace programs to prevent injury and improve health and wellbeing through positive behaviour change.



## 2. BYRNECUT GROUP – SUPPLY CHAIN ASSESSMENT

### Reporting Criteria #2 - Byrnecut Group – Supply Chain

- The Byrnecut Group's supply chain includes the procurement of goods and services.
- The Byrnecut Group has approximately 2800 suppliers.
- Our supply chains include the following services and products:
  - Equipment and spares
  - Consumables
  - Oils and lubricants
  - Site utilities and infrastructure
  - Freight and transport
  - Explosives
  - Labour hire
  - Corporate services
- Approximately 93% of the Group's procurement expenditure was made within Australia, and the remainder was largely spent in Africa and the Middle East.
- The majority of its suppliers are located in Australia.
- The Byrnecut Group recognises that its suppliers may source products from outside Australia, which has the potential to present modern slavery risks.

## 2. BYRNECUT GROUP – SUPPLY CHAIN ASSESSMENT (cont.)

Reporting Criteria #3 – Describe the risks of modern slavery practices in operations and supply chain

### Modern slavery risks

- The Byrncut Group has carried out a Group-wide identification of its modern slavery risks in its operations and supply chain.
- The process followed involved consideration of:
  - Group company policies, procedures and compliance
  - Supply chain processes, compliance and supply contract terms

### Supply chain risk assessment process

- The Byrncut Group sent a detailed Modern Slavery questionnaire to 675 of its suppliers as part of our risk assessment process.
- The majority of respondents have provided their modern slavery policy, indicating compliance with modern slavery requirements.
- The responses are being collated and reviewed and will be analysed into FY21.

### Key risks

Following the risk assessment process, the key risks identified for the Byrncut Group include:

- Supply chain management risks
- Supply chain goods risk
- Offshore employee and supply chain labour risks

## 2. BYRNECUT GROUP – SUPPLY CHAIN ASSESSMENT (cont.)

Reporting Criteria #4 – Describe the actions taken to address risks including impact of COVID-19

### **Governance:**

- Key policies that address human rights and modern slavery include our Group:
  - Code of Conduct
  - Workplace Behaviours Policy
  - Whistle-blowers' Policy
  - Modern Slavery Policy
  - Diversity and Inclusion Policy
  - Grievance Procedure

### **Supplier Pre-qualification:**

- Our site supplier pre-qualification assessment process involves confirmation of compliance requirements (insurance and certifications)

### **Supplier Contract Terms:**

- Our supplier purchase order terms require modern slavery reporting and compliance

### **Impact of Covid-19**

- The Byrncut Group communicated with its Tier-1 suppliers in 2020 to identify any increased risks due to COVID 19. No increased modern slavery risks were identified. The Group will continue to monitor the impact of Covid-19 into FY21.

### 3. BYRNECUT GROUP – FUTURE ACTIONS

Reporting Criteria #5 – Address the effectiveness of future actions

#### Group Goal

The Byrncut Group's goal: to maintain responsible and transparent supply chains

The Byrncut Group proposes to implement the following processes over the next 12 months to reduce the risk of modern slavery in our supply chain.

Increased governance across:

#### Group

- Increase knowledge and awareness of modern slavery risks in operations and supply chains

#### Suppliers

- Analysis of supplier questionnaire results
- Annual audits of our Tier-1 suppliers
- New assessment of supplier governance (compliance with procedures and policies) within the Group tender process and supplier creation process

#### Clients

- Review of client site policies, procedures and contract terms



## 4. BYRNECUT GROUP – SUBSIDIARIES

Reporting Criteria #6 – Describe how reporting entity consulted on its Statement with subsidiary entities

- The assessment of modern slavery risks involved engagement across the Byrncut Group with key stakeholders and executive management.
- Each reporting entity within the Byrncut Group was consulted and provided feedback in relation to this Statement.

## 5. EXECUTIVE APPROVAL

The Byrnecut Group Modern Slavery Statement was approved by the board of Byrnecut Australia Pty Ltd on behalf of the Byrnecut Group entities on 15 June 2021.

A handwritten signature in black ink, appearing to read 'Steve Coughlan', is positioned above the printed name.

Signed: STEVE COUGHLAN  
Executive Chairman





**A CUT ABOVE™**  
In contract mining

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