



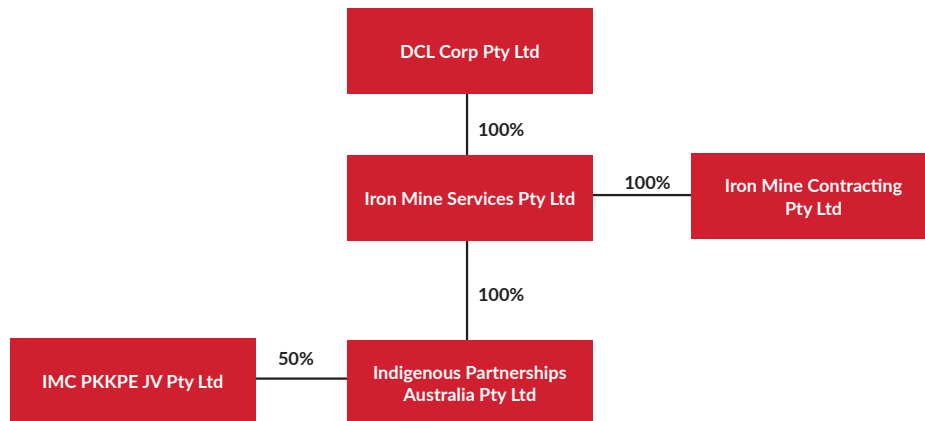
MODERN SLAVERY STATEMENT

Iron Mine Contracting Group of Companies
for the Financial Year 30 June 2024

1. OUR COMPANY STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Our combined statement for the Financial Year ended 30 June 2024 is made in accordance with the Australian Modern Slavery Act 2018 and this represents our ongoing compliance to the reporting requirements.

The corporate structure is outlined below and this combined statement covers all named entities. For the purposes of reference across this statement, we will refer to the whole group, including DCL Corp Pty Ltd (our Ultimate Parent Entity) as **Iron Mine Contracting Group**. There have been no changes to this structure since our previous statement for 2023.



Iron Mine Contracting Group was formed to provide Civil, Mining, Crushing and Screening and Indigenous partnering opportunities to the West Australian market. We and our indigenous Joint Venture partners have been delivering projects to Tier 1 Resource clients since 2013.

Our client operations we support are typically are present in gold, iron ore, lithium and oil & gas sectors.

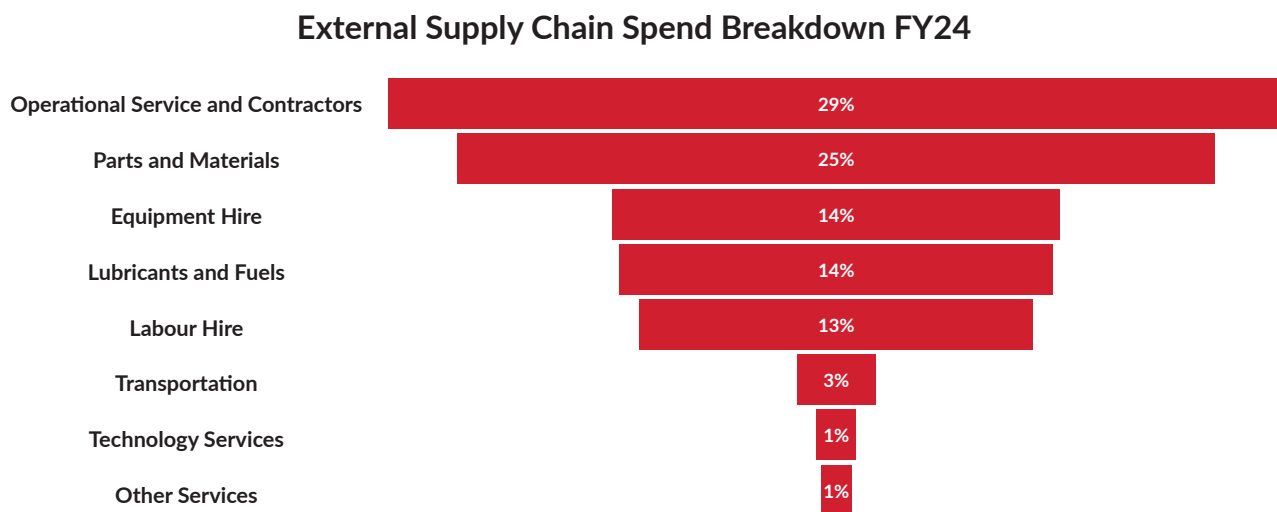


We are headquartered in Osborne Park, Western Australia and employ over 400 people across project and workshop operations in Western Australia.

During our 2024 financial year, our operations spanned across over 10 site locations in regional Western Australia for reputable resource clientele, with notable strategic growth of our capability into Mining Contracting, in the lithium commodity sector.

From a supply chain perspective, whilst we experienced notable revenue growth through our Mining Contracting division, our supply chain only experienced modest changes across our existing base of over 500 suppliers as we leveraged primarily existing supply relationships to support our expanded operations in mining.

The primary changes in the past 12 months have been the on-boarding of major subcontractors, fuel supply and labour hire suppliers to support, which is reflected in our spend breakdown below.



2. RISKS OF MODERN SLAVERY

Holistically, our risk profile is and we believe is still low. It has not materially changed since our previous reporting submissions as a result of the composition of the nature of our supply chain of which all our suppliers are all Australian entities.

Less than 25% of our total supplier base, are directly service and labour oriented suppliers.

From a direct workforce which is employed in accordance with Australian laws, applicable modern awards, and enterprise agreements.

Our risk position and view is supported and informed through:

- On-boarding mechanisms in place
- Composition and changes in of our supply base
- Composition of our direct workforce
- Historical performance, being no reported breaches or escalations to date through internal channels available within our reporting group

3. OUR ACTIONS AND TO ASSESS AND ADDRESS RISKS

In FY2024 we undertook the following key actions and initiatives:

Supplier On-boarding – Approvals Review

An expanded and formalized approval checklist, review and sign-off process was established to capture and flag any potential deviations or non-compliances for on-boarding of all new suppliers.

Contracting Terms and Conditions

Beyond our Goods and Services agreement, Modern Slavery compliance clauses in our commercial terms have also been reviewed and expanded for incorporation into our:

- Plant Hire Agreements
- Subcontracting Agreements
- Purchase Order Terms

External Compliance Audit Options Planning

We engaged external consultancies as options to consider for future Modern Slavery compliance audit engagements across our supplier base and have made allowances in our annual budgeting for these to occur into the future to proactively identify and maintain compliance across Modern Slavery.

Policy Updates

We commenced development of a more formalized Procurement and Supply Chain policy that highlights our commitment to Modern Slavery initiatives and compliance.

Mobile Incident and Hazard Reporting

Our upgraded safety management system extended to offer mobility functionality to enable ease of hazard and incident reporting to all of our workforce. Categorization of hazards and risks, including human risks, expanded and compliments our other existing reporting and risk identification mechanisms within our organization.

4. ASSESSING EFFECTIVENESS OF OUR ACTIONS

Our actions and effectiveness for FY24 have been continuously monitored and reviewed by the Procurement function. Deficiencies or improvements are addressed as they arise and opportunities for continuous improvement are identified. As a summary:

- We highlight, from one of the initiatives outlined in our 2023 Modern Slavery Statement, the application of our Modern Slavery Questionnaire in our tendering package, identified a supplier during a tender process that required further development in their reporting compliance to Modern Slavery. The supplier was ultimately not successful in our tender process and through a post tender debrief, they acknowledged this gap and had taken steps forward to address this moving forward – the feedback to them was invaluable.
- Additionally, through ongoing compliance audits and review processes by our external clientele we are required to participate in, we have been able to demonstrate compliance to their respective Modern Slavery review requirements.
- Overall, no modern slavery breaches in our operations were reported in FY2024

5. OUR CONSULTATION

Company representatives were consulted in the development of this statement to ascertain the modern slavery risk in the supply chain, and to ensure that information provided is true and correct.

6. OUR FUTURE FOCUS

Iron Mine Contracting Group are committed to a continual improvement plan in assessing modern slavery risk and mitigation. Our objective is to eliminate risk in our supply chain and identify and breaches or non-compliance in a timely manner.

One of our key future initiatives, is a review of a potential new supplier and contractor management system that would be a more dedicated and functional management platform that would further enhance our efforts in this area and Modern Slavery compliance and management.

7. OUR STATEMENT APPROVAL

This Statement is made on behalf of the Iron Mine Contracting Group for the financial year ending 30 June 2024 and it has been approved by our governing body, the Board of Directors.



Clinton Keenan

Chief Executive Officer

(Signing as authorized Responsible Member)

11.03.2025