

The background is a solid dark blue. On the left side, there is a vertical line of small, light blue dots. In the upper left quadrant, there is a large, light blue gear. In the upper right quadrant, there are three yellow gears of different sizes, arranged in a descending sequence. In the lower center, there is a medium-sized light blue gear and a smaller light blue gear below it.

# **MADER**

## **Modern Slavery Statement**

FOR THE YEAR ENDED 30 JUNE 2024

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MADER GROUP LIMITED  
ABN 51 159 340 397

# Modern Slavery Statement 2024

## 1. Introduction

This Modern Slavery Statement (**Statement**) is made pursuant to the Modern Slavery Act 2018 (Cth) (**Act**). This is the fourth modern slavery statement of Mader Group Limited ACN 159 340 397 (**Company**) under the Act. This Statement covers the operations and supply chains of the Company and its controlled entities (**Mader Group**) in accordance with s14(1) of the Act.

The Mader Group opposes all forms of modern slavery and is committed to operating its business lawfully, ethically and in respect of human rights. This Statement sets out the actions the Mader Group has undertaken during the financial year ending 30 June 2024 (**FY24**) to identify and address the risks of modern slavery in its operations and supply chains in accordance with the seven mandatory reporting criteria outline in s16 of the Act. This Statement also outlines the actions proposed to be taken by the Mader Group in relation to modern slavery risks in the future.

## 2. The Mader Group

### Overview

The Mader Group is a leading, global equipment maintenance provider, powered by mechanically minded specialists. The Mader Group provides premium heavy mobile equipment maintenance support and ancillary services to mining and civil clients throughout Australia, Asia, Africa and the Americas.

### Structure and Operations

The Company is the ultimate parent company of the Mader Group. The Company is listed on the Australian Stock Exchange (ASX:MAD). All Mader Group entities operate under the direction and governance of the Company.

The Mader Group is headquartered in Perth (WA) and has regional offices in Kalgoorlie (WA), Brisbane (QLD), Singleton (NSW), Ulaanbaatar (Mongolia), Solwezi (Zambia), Hong Kong (Hong Kong), Fort Collins (USA), Edmonton (CAN) and Calgary (CAN). The Mader Group also has a maintenance centre in Perth (WA).

Over its 19 years of operation, the Mader Group has gained experience throughout Australia, Asia, Africa and the Americas, providing a wide range of maintenance services to over 570 sites and 430 customers worldwide. The Mader Group currently has over 3,200 staff servicing customers providing specialised contract labour for maintenance of heavy mobile equipment in the resources sector.

Mader Group revenue for FY24 was \$774.5 million, comprising \$585.7 million in Australia, \$177.8 million in North America and \$11 million in all other countries.

### Supply Chain

The Mader Group's supply chain consists of goods and services that support our operations in Australia, Asia, Africa and the Americas. The Mader Group's supply chain has not changed substantially since the last financial year. The Mader Group's supply chain for FY24 consisted of over 1,490 direct suppliers. Key products and services the Mader Group procure include vehicles, parts, fuel, tools and equipment for use in its operations, together with travel and accommodation services, corporate services, administrative services, IT services and insurances required to enable the delivery of our services.

In FY24, total procurement spend of the Mader Group was over \$168 million, of which around 69% was paid to Australian suppliers, 30% was paid to suppliers located in the USA and Canada and the remaining 1% was paid to suppliers principally located in Asia and Africa.

### 3. Modern Slavery Risks

The Mader Group recognises that modern slavery risks have the potential to exist in a businesses' operations and supply chains through a variety of circumstances. The following areas may be indicators of higher potential risk areas for modern slavery practices:

- *Geographic locations* – Certain countries are associated with a greater risk of modern slavery practices (for example, see the UN Global Slavery Index).
- *Industry sectors* – Certain industry sectors are deemed higher risk in international and national guidance documentation (for example, see the ACSI guide on Modern Slavery Risks, Rights & Responsibilities 2019).
- *Commodities/products* – Certain commodities and products are deemed higher risk in international guidance documentation (for example, see the ILAB's 2024 List of Goods Produced by Child Labour or Forced Labour and Modern Slavery Act 2018 – Guidance for Reporting Entities ("Government Reporting Guide").

We acknowledge that a small portion of our suppliers providing goods and services to deliver our operations pose a higher risk for modern slavery practices, for example cleaning and IT services and equipment, textiles and garments, products made of rubber such as wheels and tyres. However, the Mader Group has assessed the overall risk of modern slavery as low in its operations and direct supply chains. The Mader Group is taking the actions set out in this Statement to address modern slavery risks where they may potentially exist.

### 4. FY2024 Actions & Outcomes

The Mader Group's focus in FY24 was to further strengthen its understanding of potential risks of modern slavery practices in its operations and supply chains and commit to further actions that will improve its ability to identify and reduce those risks in the future. The actions taken by the Mader Group in FY24 are set out below:

- a. *Risk assessment* – We completed an updated risk assessment of our operations and supply chains seeking to identify potential modern slavery risks. This included assessment of our direct suppliers and taking a risk based approach in consultation with the above guidance on indicators of higher modern slavery risks with desk-based research to determine the categories of expenditure with the highest risk. No immediate concerns were raised as the majority of goods and services purchased by the Mader Group were sourced from low risk, first tier and domestic based suppliers. However, to ensure that Modern Slavery is detected within our supply chain operations, our supplier due diligence processes will be reviewed annually to reduce the exposure to modern slavery within our supply chains.
- b. *Our staff* – We ensure that all employees and contractors across the Mader Group's large workforce are able to demonstrate their eligibility to work in the applicable countries where services will be provided prior to commencing work with the Mader Group. We do not tolerate any instances of modern slavery practices by our employees, suppliers or contractors. We did not become aware of any modern slavery practices in the reporting period, however if such instances are discovered we commit to working with the affected party and appropriate authority to ensure the breach is addressed as soon as practicable.
- c. *Supplier engagement* – We continue to engage with our direct suppliers to help identify risks of modern slavery, with a focus on industry sectors, geographic locations or product categories associated with higher modern slavery risks. We continue to explore ways to improve our supplier engagement processes including, for example, through the use of modern slavery questionnaires, if deemed appropriate as part of our risk assessment processes.
- d. *Policy review* – The Mader Group's corporate governance framework seeks to address the risks associated with modern slavery within a suite of policies, procedures and guidelines which are available to all employees. This includes the Mader Group's Code of Conduct,

Whistleblower Policy and Modern Slavery Policy. We undertook a review of our Modern Slavery Policy to consider its effectiveness in mitigating modern slavery risks in our business and supply chains as part of our broader framework of policies and procedures. We believe that our Modern Slavery Policy appropriately address modern slavery risks in our operations and supply chains at this time.

- e. *Risk management framework* – We reviewed our approach to risk management across all areas of our business potentially affected by modern slavery risks, in particular our procurement and risk management systems. No immediate concerns were raised, however we identified areas of further improvement in these processes, including in relation to supplier engagement.
- f. *Contracting* – We reviewed our contract templates for appropriate clauses to help minimise modern slavery risks. No immediate concerns were raised, however we will look to incorporate modern slavery clauses into more of our supplier templates on an ongoing basis.
- g. *Awareness & training* – Key stakeholders within the Mader Group were advised on the suppliers and industries within its supply and business operations which presented the greatest risk of modern slavery practices and were trained to identify and address any concerns regarding modern slavery practices when assessing a supplier’s actions and behaviours.

## **5. FY25 Actions**

The Mader Group will regularly assess potential modern slavery risks in our operations and supply chains and work to improve and develop our modern slavery risk mitigation measures. Where any deviation to our codes, policies and procedures is found to have occurred, we will investigate the deviation and will undertake the appropriate remedial action.

The Mader Group presently plans to take the following actions in FY25 to identify and address modern slavery risks:

- a. *Risk assessment* – Our Procurement and Legal teams will collaborate to complete an updated risk assessment of our operations and supply chains to identify potential modern slavery risks, generally looking at ways that this exercise can better identify higher risk suppliers and gain greater visibility into their supply chains and procurement practices.
- b. *Supplier engagement* – We will continue to engage with our direct suppliers identified as higher risk for modern slavery due to their industry sectors, geographic locations or product categories.
- c. *Our staff* – We ensure that all employees and contractors across the Mader Group’s large workforce are able to demonstrate their eligibility to work in the applicable countries where services will be provided prior to commencing work with the Mader Group and are aware that our anonymous whistleblower program is available for reporting of any instances of modern slavery practices.
- d. *Policy review* – We will complete an updated review of our corporate governance framework including our Modern Slavery Policy to consider its effectiveness in mitigating modern slavery risks in our business and supply chains as part of our broader framework of policies and procedures.
- e. *Risk management framework* – We will complete an updated review of our risk management framework, including improvements made as a result of previous reviews and focus on our procurement processes in light of the potential modern slavery risks faced by our business.
- f. *Contracting* – We will continue our ongoing review and update of our supplier templates and engagement documentation to consider if further updates can be made to better address potential modern slavery risks..

- g. *Awareness & training* – We will continue to raise awareness to more of our staff on modern slavery risks and how these risks can be minimised.

## **6. Measuring Effectiveness**

The Mader Group has undertaken a number of actions to date as set out in this Statement to identify, address and mitigate the risks of modern slavery in our operations and supply chains. The Mader Group is continuing to collect information regarding the modern slavery risks in our operations and supply chains.

The actions to be taken in FY25 as set out in this Statement are aimed at updating our modern slavery risk detection, strengthening our assessment and mitigation strategies across our operations and supply chains and better measuring the effectiveness of risk mitigation measures adopted by the Mader Group in FY24.

The Mader Group will explore further mechanisms to measure the effectiveness of our actions undertaken to address modern slavery risks.

## **7. Consultation with controlled entities**

Each controlled entity in the Mader Group operates under the direction and governance of the Company. These entities were consulted in relation this Statement, the actions taken, and future commitments made in relation to modern slavery risks. The supply chains and operations of all controlled entities in the Mader Group were included in the risk assessment undertaken in FY24.

In accordance with section 14(1) of the Act, this Statement is given by the Company and covers the Company and the following reporting entities:

- Mader Contracting Pty Ltd (ACN 114 021 537)
- Mader Queensland Pty Ltd (ACN 611 004 552)

**This Statement has been approved by the Board of the Company.**



Justin Nuich  
Chief Executive Officer  
Mader Group Limited

Dated: 31 December 2024