



# **SQUARE GROUP**

## **Modern Slavery Statement**

**Year Ending 30 June 2022**



## Square Group Modern Slavery Statement (MSS)

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## Square Group Modern Slavery Statement (MSS)

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### PREAMBLE

This Modern Slavery Statement (“**MSS**”) documents the approach the Square Group shall adopt to meet the mandatory criteria in the *Modern Slavery Act 2018 (Cth)* (“**the Act**”).

### MODERN SLAVERY DEFINITION

The term Modern Slavery refers to “situations where coercion, threats or deception are used to exploit victims and undermine their freedom”. Eight types of exploitation are identified under the Act:

- **Trafficking in persons:** the recruitment, harbouring and movement of a person for expected exploitation through modern slavery.
- **Slavery:** exercise of power over a victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.
- **Servitude:** where the victim’s personal freedom is significantly restricted and they are not free to stop working or leave their place of work.
- **Forced labour:** where the victim is either not free to stop working or not free to leave their place of work.
- **Forced marriage:** where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.
- **Debt bondage:** where the victim’s services are pledged as security for a debt and the debt is manifestly excessive or the victim’s services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
- **The worst forms of child labour:** where children are exploited through slavery or similar practices, including for sexual exploitation, or engaged in hazardous work which may harm their health, safety or morals, or used to produce or traffic drugs.
- **Deceptive recruiting for labour or services:** where the victim is deceived about whether they will be exploited through a type of modern slavery.

### REPORTING ENTITY AND SUBSIDIARIES

Square Resources Holding Pty Ltd ACN 142 476 631 (“**SRH**”), a Brisbane-based proprietary Australian company is part of the Square Group and is the reporting entity for this MSS. The other entities owned or controlled by SRH within the Square Group are:

- Square Trading Pty Ltd ACN 147 788 663;
- Square Marketing Pty Ltd ACN 615 813 226;
- Square Investment Holding Pty Ltd ACN 626 752 725;
- Square Boyne Pty Ltd ACN 147 828 448;
- Square Resources Holding (No. 2) Pty Ltd ACN 623 713 682;
  - Square Resources Holding Singapore Pte. Ltd. (Singapore);
  - Square Trading Singapore Pte. Ltd. (Singapore);
- Square Resources Colombia S.A.S. (Colombia);



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- Square Exploration Pty Ltd ACN 147 787 451 (“**SQX**”);
- Square Eastern Pty Ltd ACN 147 828 626 (“**SQE**”);
- Eastern Coal Joint Venture (“**ECJV**”).

### **STRUCTURE, OPERATIONS AND SUPPLY CHAINS**

The Square Group entities are involved in a range of different business activities:

- Excluding SQX, SQE and ECJV, the related entities are involved in resource marketing and trading activities. SQX, SQE and ECJV have been involved in resource exploration within Queensland.
- For its resource trading and marketing activities, the Square Group sources mineral production from Australian and overseas producers. The Square Group does not currently hold major equity nor participate in the management of any of the mining operations nor any supply chain downstream activities or services.
- Trading and marketing activities are primarily, but not solely, focussed on larger industrial customers within Asia.
- The majority of Square Group employees are based in Brisbane, Queensland and involved in resource marketing and trading activities. A number of country representatives based in some of the Square Group’s major overseas sourcing and sales country have been engaged to communicate with suppliers and customers.

### **POTENTIAL MODERN SLAVERY RISKS**

The risk of modern slavery within the Square Group direct business operations has been determined to be low:

- All Square Group employees are engaged on employment contracts and paid above standard salaries and performance bonuses.
- The Square Group generally has stable longer-term arrangements with its significant suppliers, and where appropriate, enters into formal contracts with its suppliers.
- Outside of the mineral production sourced from overseas mine sites, most of the Square Group’s direct suppliers are from Australia.

### **MODERN SLAVERY RISK ASSESSMENT AND MITIGATION**

The Square Group recognises that monitoring and addressing modern slavery risks in its supply chains is a continuous process:

- All Square Group employees will be required to undergo briefing sessions on Modern Slavery and to be familiar with the contents of the Square Group MSS.
- Consistent with this Statement, reports of known or suspected modern slavery within the Square Group’s operations or supply chains should be referred to the Square Group management, who will be required to investigate and assess the potential issue against the relevant country’s laws as well as Australian laws.
- Such assessments shall then be referred to the Board of SRH for review and risk mitigation and/or remediation action as deemed appropriate.



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### **MODERN SLAVERY RISK MANAGEMENT EFFECTIVENESS**

Management shall report to the SRH Board on the Square Group's Modern Slavery risk management activities and the Board will assess effectiveness based on evaluation criteria that may include:

- Roll-out of MSS knowledge to all Square Group employees; and
- The number of labour exploitation issues identified, assessed and actioned by Square Group management.

### **CONSULTATION PROCESS**

Square Resources Holding Pty Ltd manages and operates its subsidiary companies and related JV entities (the Square Group) through a common management structure and the SRH Board has been responsible for preparation and approval of this Statement. Square Group management will consult with its stakeholders including related JV Boards as required to ensure that the Square Group meets its obligations as outlined in this Statement.

### **MODERN SLAVERY STATEMENT APPROVAL**

This Modern Slavery Statement was approved and ratified by the Directors of Square Resources Holding Pty Ltd at a Board meeting of Square Resources Holding Pty Ltd on 7 July 2023.

*Kevin Kanamori*

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Kevin Kanamori  
Chief Executive Officer  
Square Resources Holding Pty Ltd

7 July 2023



# Signature Certificate

Reference number: M2PCS-82TXF-MS529-BUG8W

## Signer

## Timestamp

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