



# MLG Oz Limited

ACN 102 642 366

MODERN SLAVERY STATEMENT

2024



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## INTRODUCTION

This statement is made for the reporting period from 1 July 2023 to 30 June 2024, in accordance with the Modern Slavery Act 2018 (the Act).

MLG Oz Limited (ABN 53 102 642 366) (MLG) is committed to the highest standards of ethical conduct and integrity in all our business activities. We recognise that modern slavery is a significant global issue that requires a proactive and comprehensive response.

This statement outlines MLG's approach to identifying and managing modern slavery risks within our operations and supply chains. We are committed to continually improving our practices to combat modern slavery, ensuring that our business activities do not contribute to human rights abuses. Through diligent risk assessments, supplier due diligence, training programs, and stakeholder engagement, MLG strives to create a safe and ethical environment for all individuals involved in our business.

Modern slavery describes situations where offenders use coercion, threats, or deception to exploit victims and undermine their freedoms. Practices that constitute modern slavery can include<sup>1</sup>:

- **Human Trafficking:** The recruitment, transportation, transfer, harbouring, or receipt of persons by improper means for the purpose of exploitation.
- **Slavery:** The state of being under the control of another person, where one is forced to work without the ability to leave.
- **Servitude:** Being forced to work and live on another person's property with no possibility of change.
- **Forced Labour:** Work performed under the threat of penalty and for which the person has not offered themselves voluntarily.
- **Debt Bondage:** Work demanded as a means of repayment of a debt or loan, where the worker has little control over their working conditions or the terms of the debt.
- **Forced Marriage:** A marriage conducted without the valid consent of one or both parties and under duress.
- **Worst Forms of Child Labour:** Employment of children in conditions that are exploitative or hazardous to their health and development.

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<sup>1</sup> Department of Home Affairs <https://www.homeaffairs.gov.au/criminal-justice/Pages/modern-slavery.aspx>

## OUR COMMITMENT

At MLG, we uphold the inherent dignity and worth of every individual as a fundamental principle guiding our operations. Our dedication to fostering fair and ethical practices is deeply ingrained in every aspect of our business, from our day-to-day operations to our broader strategic initiatives. We recognise the critical importance of combating modern slavery and human trafficking, understanding that these issues represent significant global challenges that demand a proactive and unwavering response.

We are resolute in our pledge to act with the highest levels of integrity, ensuring that our business relationships, both internally and externally, are founded on principles of fairness, respect, and transparency. While we recognize that there is still work to be done to enhance our focus in this critical area, we are committed to making meaningful progress. MLG actively engages with our suppliers, partners, and stakeholders to promote and uphold human rights, ensuring that every individual within our sphere of influence is treated with the respect and fairness they deserve.

In doing so, we strive to create a business environment that not only meets but exceeds the expectations of ethical responsibility, contributing to a global movement that seeks to eradicate modern slavery and uphold the freedoms and rights of all individuals. Through continuous improvement and vigilance, we aim to ensure that our operations are free from exploitation and that our practices reflect our deep commitment to human dignity and ethical conduct.

## OUR OPERATIONS

MLG is an Australian-based leading provider of integrated mine-site services, established in 2001. Headquartered in Western Australia, MLG listed on the Australian Stock Exchange on May 4, 2021.

MLG offers comprehensive mine site services including bulk haulage and site services, crushing and screening, construction materials supply, civil works and open pit mining. With operations spanning Western Australia and the Northern Territory, MLG is committed to delivering efficiency, safety, and sustainability in the mining and civil construction industries.

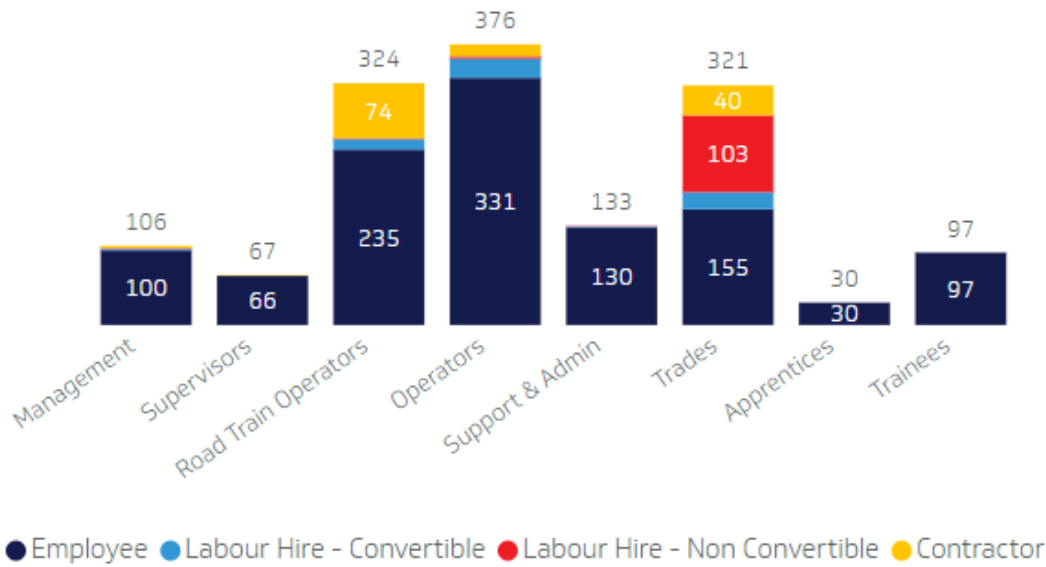
## OUR PEOPLE

MLG has 1,159 direct employees, and a further 312 contractors and labour hire personnel spread across 33 sites in Western Australian and the Northern Territory, making a total workforce of 1,471. MLG prides itself on fostering a collaborative and inclusive work environment. We invest in continuous training and development to ensure our staff are equipped with knowledge and skills to discharge their duties to the highest standards. Our commitment to safety, diversity, and career growth enables us to attract and retain top

talent, driving the success of our integrated mine-site services and delivering exceptional value to our clients.

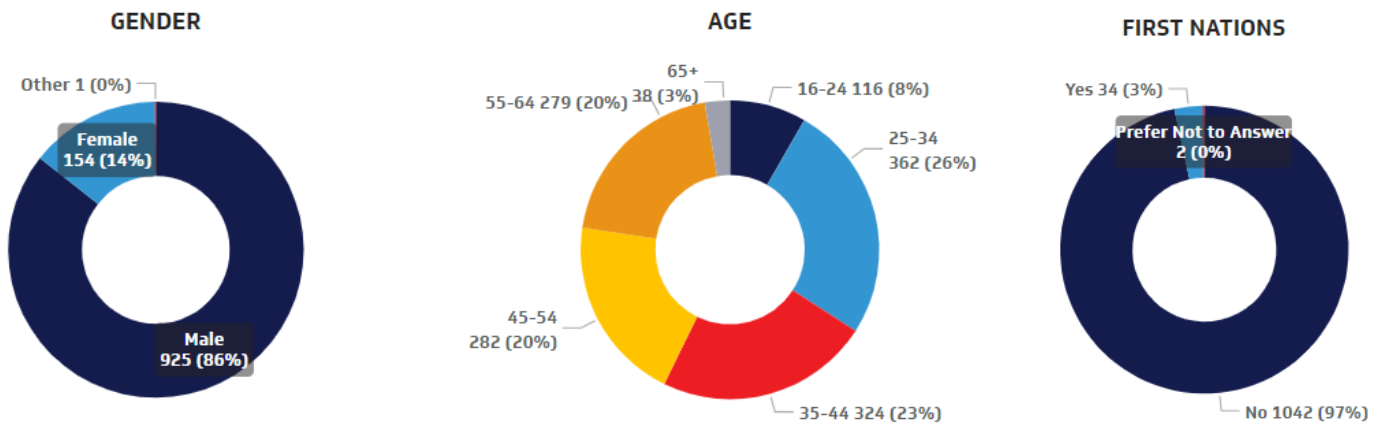
MLG’s workforce primarily consists of site-based operators and maintenance personnel, with only 20.8% of the total workforce occupying management, supervisory, and administrative positions. Graph 1.1 below illustrates this distribution:

GRAPH 1.1 – Workgroup by Role <sup>2</sup>



A summary of MLG’s employee participation rates is presented below in Graphs 1.2:

GRAPH 1.2 – Workgroup Participation Rates <sup>2</sup>



<sup>2</sup> Accurate as of the date of this Statement

## OUR SUPPLY CHAIN

MLG's supply chain is integral to our operations, encompassing a wide range of goods and services essential to our business. Our supply chains include the procurement of goods and services from various suppliers, including but not limited to equipment, parts and consumables, and professional services.

We work with a diverse group of suppliers to procure materials, equipment, and services that support our mining and civil construction activities.

MLG's supply chain includes:

- **Parts and consumables:** Sourcing high-quality parts, components and consumables necessary for the maintenance and operation of our machinery and equipment.
- **Equipment:** Procuring machinery and equipment necessary for our services
- **Logistics:** Coordinating transportation and logistics solutions to ensure the timely delivery of equipment, parts and consumables across our sites throughout Western Australia and the Northern Territory.
- **Subcontracted Services:** Engaging reputable subcontractors to provide skilled and specialised services that complement and/or support our core offerings.

We are committed to ethical sourcing practices to ensure our suppliers adhere to our standards of integrity, safety, and environmental responsibility. By maintaining strong relationships with our suppliers, we strive to promote sustainable and ethical practices throughout our supply chain.

MLG prioritises the engagement of local suppliers and contractors, with a significant portion of our supply chain being sourced from businesses within Australia. This approach reflects our ongoing commitment to supporting the local economy and fostering strong, community-based partnerships.

At the time of this statement MLG had a total reporting period spend of \$392.9 million, with less than 0.5% of the spend categorised as overseas suppliers.

## IDENTIFYING & ASSESSING MODERN SLAVERY RISKS

While MLG has initiated work to address modern slavery risks, we recognise that this is an ongoing process requiring continuous development and improvement. Our approach involves:

- **Mapping Our Supply Chains:** We have begun mapping our supply chains to identify areas where the risk of modern slavery is most significant. This includes assessing the geographic locations, sectors, and types of goods and services we procure.

- **Supplier Due Diligence:** We are developing a supplier due diligence process that requires our suppliers to provide information on their policies, practices, and procedures related to modern slavery. This process includes evaluating suppliers' compliance with legal and ethical standards.
- **Risk Assessments:** We are conducting and will continue to conduct regular risk assessments to evaluate the likelihood and impact of modern slavery within our operations and supply chains. These assessments help us to prioritise our efforts and focus on high-risk areas.

By continuously refining these processes, MLG aims to strengthen our efforts to combat modern slavery and uphold the highest standards of human rights across our operations and supply chains.

## MODERN SLAVERY RISKS

### Industry Sector Risk and Sourcing

MLG regards sourcing suppliers and services from within Australia as low-risk to modern slavery owing to the strong regulatory framework that exists. However, we are cognisant to the possibility that modern slavery could be present in our supply chain, considering, the type of goods that are procured include:

- Equipment parts
- laptops, computers, and mobile phones
- clothing and Personal Protective Equipment (PPE)
- rubber-based products (conveyors and tyres)

### Employment

All MLG employees are subject to Australian employment law and are provided with a written employment contract and a comprehensive range of induction training to ensure they are well-prepared and informed about their roles and responsibilities.

Our recruitment processes and practices are continually reviewed to ensure that the engagement of employees is undertaken ethically, on a non-discriminatory basis, and without any misleading information. We strive to foster a fair and inclusive workplace, promoting equal opportunity for all candidates.

All personnel engaged by MLG must possess and be able to demonstrate their legal right to work within Australia. This verification process is rigorously enforced to ensure compliance with immigration laws and to prevent any form of illegal employment or exploitation.

Additionally, we provide ongoing training and development opportunities to support the professional growth and well-being of our employees.

We recognize that engaging third-party labour hire companies may reduce our visibility over the conditions of certain personnel, potentially heightening modern slavery risks. However, all personnel hired through these companies operate under MLG's direct control and influence, adhering to our standards. We maintain stringent oversight to ensure fair and ethical treatment of all workers, in alignment with MLG's core values.

### Procurement & Supply Chain

MLG sources its suppliers and contract providers within Australia to minimise the potential risks of modern slavery. We acknowledge, however, that our current procurement decisions and processes need continual review and improvement to ensure the highest standards of supply chain assessment. This is an area we have actively sought to address. Strategic procurement now falls within the Commercial Department under the accountability of the Chief Commercial Officer. In 2024, MLG appointed a Commercial Procurement Lead to lead these efforts.

We are fostering closer collaboration between MLG's centralised purchasing team, site-based purchasing teams, and the commercial team to ensure a cohesive and comprehensive approach to procurement. Additionally, we are in the process of implementing a new Vendor Management System across the business, which will enhance our ability to assess, monitor, and engage with our suppliers more effectively. This system will provide a robust framework for supply chain assessment, helping us to identify and mitigate any potential risks related to modern slavery. Through these initiatives, we aim to build a more ethical and transparent supply chain, ensuring that our procurement practices align with our commitment to human rights and fair labour practices.

## ACTIONS TAKEN IN DURING THE REPORTING PERIOD

In the 12 months preceding this report, MLG implemented the following measures to assess and mitigate the risks associated with modern slavery:

### Personnel

To enhance our efforts in combating modern slavery, MLG appointed its first dedicated procurement employee, establishing the role of Commercial Procurement Lead. This position is pivotal in refining our procurement practices and ensuring alignment with our ethical standards. The Commercial Procurement Lead works in close collaboration with key personnel, including MLG's Chief Commercial Officer (CCO) and the purchasing team, to implement effective and responsible supply chain management strategies.



### Vendor Management System

MLG committed to the implementation of a new Vendor Management System across the business. This system will enhance our ability to assess, monitor, and engage with our suppliers more effectively. It will provide a robust framework for supply chain assessment, helping us to identify and mitigate any potential risks related to modern slavery. The new system will include comprehensive vendor profiles, risk assessment tools, and performance monitoring features, ensuring a more transparent and ethical supply chain management process.

### Supplier Engagement

MLG proactively engaged with suppliers identified as high-risk for potential modern slavery practices, initiating direct dialogues to thoroughly understand their existing policies and practices related to ethical labour standards. These discussions were aimed at ensuring that these suppliers not only adhere to MLG's ethical expectations but also actively work to mitigate the risk of modern slavery within their own operations and supply chains.

### Labour Hire Supplier Review

MLG undertook a comprehensive review of its labour hire providers and, based on the findings, entered into new service agreements that align with MLG's ethical standards and compliance requirements. As a result of this comprehensive evaluation and the establishment of new agreements, MLG formed an 'Approved Panel of Providers.' This panel comprises labour hire companies that have demonstrated a strong commitment to ethical labour practices and have met or exceeded MLG's standards for preventing modern slavery. By formalising this panel under new service agreements, MLG not only streamlines its labour hire processes but also ensures that all personnel sourced through these providers are protected under agreements that prioritise their rights and well-being.

### Policy

MLG reviewed and re-communicated several key policies to our workgroups to ensure awareness and adherence among all employees. These policies include:

- **Social Responsibility Policy:** Outlining our commitment to ethical business practices and social responsibility.
- **Modern Slavery Policy:** Providing guidelines to identify, prevent, and address modern slavery within our operations and supply chains.
- **Whistleblower Policy:** Encouraging employees to report any unethical behaviour, including potential modern slavery practices, without fear of retaliation.

By taking these actions, MLG is committed to continuously improving our practices to prevent modern slavery and uphold the highest standards of human rights across our operations and supply chains.

## MONITORING EFFECTIVENESS & CONTINUAL IMPROVEMENT

MLG acknowledges that the identification and management of modern slavery risk(s) to our operations and supply chain is an ongoing concern, and we will continue to monitor the effectiveness of our processes and procedures, acting upon opportunities for improvement as they are identified.

For the year ahead we are committed to the following actions to ensure the effectiveness of our modern slavery processes:

- To ensure a comprehensive understanding and effective management of modern slavery risks, key stakeholders across the organisation, particularly those involved in supplier engagement, will complete the Modern Slavery training course provided by the University of Technology Sydney (UTS). This mandate applies to the following personnel:
  - Chief Commercial Officer;
  - Commercial Procurement Lead; and
  - Inventory & Purchasing Manager.
- All members of the Executive Leadership Team complete the short form Modern Slavery training course offered by the UTS.
- Developing a Modern Slavery supplier survey for distribution to our supply chain allowing for a deeper assessment and appreciation of our modern slavery risks.
- Reviewing and updating our standard contractual terms for suppliers classified as high-risk to ensure that all employees, contractors, and suppliers comply with our minimum standards relating to human rights and modern slavery.
- Continue to track performance through our whistleblower provisions (to date we have not received any whistleblower reports or other complaints relating to actual or potential modern slavery).

## APPROVAL

This statement was approved and authorised for publication by the board of MLG Oz Limited

A handwritten signature in black ink, appearing to read 'Murray Leahy', with a long horizontal stroke extending to the right.

**Murray Leahy**

Chief Executive Officer & Managing Director

MLG Oz Limited

12 August 2024