

MODERN SLAVERY STATEMENT

PAYLOAD INDUSTRIES PTY LTD

MAKING LOAD AND HAUL EQUIPMENT
MORE PRODUCTIVE

1 July 2024 to 30 June 2025



ABOUT THIS REPORT

This statement is issued by Payload Industries Pty Ltd [“Schlam Payload”] under the Australian Modern Slavery Act 2018 [Cth] [“the Act”]. It sets out actions to assess and address the risks of modern slavery in its operations and supply chains during the reporting period 1 July 2024 to 30 June 2025.

The statement is made in line with the requirements of the Act and covers initiatives undertaken by Schlam Payload and its wholly owned subsidiary, Schlam Americas Inc. All references to the company, we or ‘Schlam’ refer collectively to Schlam Payload and Schlam Americas unless otherwise specified. All values are in Australian dollars [AUD] and all data provided in the tables reported is as at 30 June 2025.

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INTRODUCTION

I am proud to introduce Schlam's Modern Slavery Statement as an example of how our organisation is maturing as we grow. Continually strengthening our governance and increasing transparency is important as we develop as a global leader in the Mining Equipment, Technology and Services [METS] sector.

Our whole team is committed to operating responsibly as our operations and markets expand across the world. We know however, that the rapid growth we are experiencing potentially exposes our people and operations to new forms of risk that need to be effectively managed, controlled and prevented.

When we think about these risks, our starting point is our Company Commitment Charter which sets out what we stand for as an organisation and a global corporate citizen. Championing integrity and ethics with our suppliers is one of the core commitments. We also identify human rights as a material issue addressed under our Environmental, Social and Governance [ESG] Roadmap as we strive to create a positive impact in the communities we work within.

Our commitments underline how seriously we take our responsibility to respect human rights and minimise the risk of modern slavery in our operations and supply chain.

We truly value our suppliers, engage with them as partners, and are determined that through ethical sourcing, our relationships will be beneficial and rewarding.

I thank the Schlam team and the suppliers who have worked with us to undertake our initial Modern Slavery assessment. Our focus has been to gain a detailed understanding of the risks of modern slavery in our operations and supply chain. We look forward to continuing to develop our capability and performance in this important work.



DAVID HASLETT

Executive Chair and Chief Executive Officer

BOARD APPROVAL

This statement was approved by the Schlam Board on 10 October 2025 .

This statement has been signed by David Haslett in his role as Executive Chair and Chief Executive Officer as an accurate and complete statement on the status of Modern Slavery management in Schlam and in accordance with section 13 of the Act on 10 October 2025.

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1. ABOUT US

WORLD LEADING PROVIDER OF MINING SOLUTIONS

Schlam is a mining services business specialising in load and haul equipment. We manufacture the world's best mining truck beds and mining buckets for all hard rock mining environments and support our customers with best-in-class product lifecycle care.

Our Hercules Mining Truck Beds and Barracuda Loading Attachments have resulted from industry-leading research and engineering to provide larger capacity, enhanced durability and lighter weight solutions. In partnership with many of the world's biggest mining companies, we offer customised solutions which increase productivity, reduce equipment downtime and carbon emissions, and minimise maintenance.

Our products are used by major surface mining operations including iron ore, coal, gold, nickel and lithium. Over more than 20 years of operations, we have supplied products to customers mining 8 different commodities on over 100 mine sites around the world. These customers include mining companies, contract miners and Original Equipment Manufacturers (OEMs).



Hercules Mining Truck Beds are manufactured for all OEMs and all models of 100 tonnes and above. They are available in three models representing different load capacities with the largest, Hercules Ultra, used for mining trucks carrying 300 tonnes and above per load.



Barracuda Loading Attachments are suitable for 100 – 600 tonne excavators, loaders and backhoes and endorsed by OEMs. The range includes high production lightweight loading attachments and armoured loading attachments.

People are our most important and valuable success factor. Our team of more than 350 employees and contractors brings extensive technical, commercial and industry expertise. Our employees represent 69% of the total workforce and the majority are located in Western Australia which is our commercial headquarters and largest production base (see table 1). Labour hire and contractor services represent 29% of our workforce. These resources have been strategically utilised to quickly secure the specialist skills needed to meet rapid growth in production demand.

Table 1. Schlam workforce profile

CONTRACT TYPE	NO.	%
Full time	242	69
Labour hire / contractors	101	29
Casual	4	1
Part time	4	1

LOCATION	NO.	%
Australia – West coast	325	93
Australia – East coast	10	3
Americas	7	2
China	5	1
The Philippines	4	1

BUSINESS MODEL

Our business model reflects our approach to work directly with customers from product concept inception and throughout the product life [see figure 1].

Mining truck beds are customised through a collaborative design process involving on-site inspections and analyses of load and haul conditions and fleets. Buckets are similarly customised for ground conditions, ore types, material properties and OEM earthmoving fleet.

Products are manufactured in both company-owned facilities in Australia and through third parties internationally. We rely on trusted third-party suppliers for transportation, assembly and installation.

A key point of difference in our business model is our comprehensive after sales support. We are developing a complete product lifecycle management solution providing tailored site services, spare parts and site technical support for customers on a site-by-site basis.

Figure 1. Schlam business model demonstrating control over the value chain from customer acquisition to lifecycle care.



OPERATIONAL LOCATIONS AND MARKETS

From origins in Western Australia, we are a global company with strategically located manufacturing centres to optimise logistical efficiency as we expand into new markets [see figure 2].

Schlam Payload is headquartered in Perth, Western Australia and manufactures products in Australia and China in facilities utilising advanced automation technologies including robotics. In Western Australia, a dedicated facility in Forrestfield manufactures truck beds and another in Waroona produces all Barracuda buckets. These products are supplied to customers in the Australian and Asia Pacific markets. A contract manufacturing arrangement in Fujian, China produces truck beds to the same high-quality standard and services growing markets in Africa, Asia and the Australian east-coast.

The headquarters of Schlam Americas is in Tuscon, Arizona. This team is responsible for market development in North and South America. During the reporting period, truck beds supplied into these markets started being produced in a facility in Monterrey, Mexico, following the execution of a manufacturing agreement in the 2024 financial year.

The Australian manufacturing facilities are managed under a quality management system certified to ISO9001:2015 and subject to annual internal audits as well as external auditing by SAI Global. Schlam oversees the third-party manufacturing arrangements in China and Mexico which are reflected within this report as ‘subcontracted fabrication and assembly services’ within the supply chain.

Manufacturing production capacity is scaling up as markets for Schlam products grow. During this reporting period, the Forrestfield workshop space expanded by 65% from 10,000 square metres to 16,500 square metres. In Monterrey, a new 10,880 square metre facility dedicated to manufacturing Schlam products is under construction and due to be complete in the 2026 financial year.

Figure 2. Map of Schlam operational locations and markets



GOVERNANCE

Schlam is a privately owned Australian company established in 1996. Schlam Payload was formed in 2016 following the corporate acquisition of DT HiLoad which owned the Forrestfield manufacturing facilities. Schlam Americas was established as a wholly owned subsidiary in 2023.

The Payload Industries Pty Ltd Board of Directors oversees the strategic direction, compliance and performance of the Schlam group (including the Schlam Americas subsidiary) through a centralised corporate governance framework. A review of enterprise risk is a standard agenda item for quarterly deep-dive meetings conducted by the Board of Directors.

The Executive Leadership Team reports to the Executive Chair and Group Chief Executive Officer and offers extensive technical and commercial expertise in the mining manufacturing sector globally.

In June 2025, the leadership and organisation were restructured into global teams reporting under a matrix structure and comprising three key elements:

- Market Development teams located regionally and with responsibility for growing customer relationships and creating demand for new products and services.
- Global Operations teams responsible for meeting that demand through product innovation, technology and manufacturing production to the highest quality standards at the lowest cost. This includes responsibility for global supply chain management.
- Specialist corporate teams responsible for providing finance, marketing, communication and human resource management services across the group.



2. GLOBAL SUPPLY CHAIN

We value our suppliers and engage them as partners within our business. As a result, we have established long term relationships with a diverse range of organisations as we build an efficient global supply chain and work to minimise operational risk.

Schlam sources raw materials, components and services from suppliers both in the communities we operate within and wider international markets. The inputs procured during the reporting period fall into three categories:

- Raw materials – steel and other metals sourced from global suppliers for the manufacturing of all products.
- Components – hydraulic systems, wear-resistant linings, and other specialised parts acquired from reputable vendors.
- Services – logistics, engineering, and consulting services to support the customisation and delivery of products.

Our preferred method of engagement with suppliers is through competitive long-term contract agreements based on Schlam's terms and conditions. Where procurement is managed by Purchase Orders, these arrangements are also in accordance with Schlam's terms and conditions. These terms include requirements for suppliers to comply with local labour laws and Schlam's policies in respect to sustainable development.

During the reporting period, our global supply chain comprised 455 suppliers across 4 countries with a total spend of \$122,556,968. The average tenure of contracts with our top 10 suppliers by value was 8 years and illustrates the importance we place on sustaining strong working relationships.

Table 2. Supply chain by country of source and category

SOURCE COUNTRY	% OF TOTAL SPEND	CATEGORIES SOURCED
Australia	57	All direct and indirect categories – steel plates, steel processing, welding consumables, logistics, subcontracted fabrication and assembly, components, paint, gas, professional services, labour hire, it, equipment hire
USA	30	Steel plates
China	12	Steel plates, components, subcontracted fabrication and assembly
New Zealand	1	Machinery and machinery parts
Total	100	

The high percentage of total spend invested in Australia reflects Schlam's well established operations in the country and major manufacturing facilities in Western Australia. We prioritise utilising local content in our supply chain and benefit from the depth and diversity of Australian suppliers to provide convenient and competitive products and services.

The top ten inputs into our business represent 94% of our total spend and are dominated by two products and services. Steel is the primary input for manufacturing Schlam products and comprises 44% of our total spend. We have long term supply agreements with the world's two leading speciality steel manufacturers for secure, cost-competitive steel applications. The second largest spend is with third-party providers of services for product manufacturing in China and Mexico and assembly services for those products transported as modular components.

Table 3. Top 10 inputs in the Schlam supply chain by total spend

TOP 10 INPUTS	% OF TOTAL SPEND
Steel plates	44.0
Subcontracted fabrication and assembly	22.0
Logistics	9.0
Labour hire	6.0
Purchased materials, parts and components	5.5
Welding wire	2.0
Plant and equipment	2.0
Factory consumables	1.5
Consultancy	1.0
Paint and painting consumables	1.0

3. MODERN SLAVERY RISKS

We respect the human rights of all people involved in our business activities and have established a Human Rights and Modern Slavery Policy. This states our commitment to supporting and respecting the protection of internationally recognised human rights and to aligning our practices and procedures with the United Nations Guiding Principles on Business and Human Rights and the Voluntary Principles for Security and Human Rights.

Under the Act, 'modern slavery' describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Eight types of serious exploitation are defined: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, worst forms of child labour.

We are working to identify and mitigate the risks of modern slavery practices within our operations and supply chain. During this reporting period, we identified inherent risks by conducting an initial desktop modern slavery risk-mapping assessment using internal procurement data, workforce profiles and publicly available indices for geographic risk.

INTERNAL OPERATIONAL RISK

During the reporting period, Schlam people operated from offices, manufacturing facilities and customer mine sites located in 13 countries across the world.

With 96% of our workforce based in Australia, Schlam complies with Australian labour laws and employment legislation. Entitlements are offered as per the National Employment Standards and applicable awards and utilise correct wage calculation methods. The terms of employment, including wage rates and hours of work, are clearly communicated in individual employee contracts in a language they understand.

In the US, Schlam Americas operates under American labour laws. While this team is currently small, the different legal frameworks and regional factors necessitate ongoing vigilance to sustain high standards of compliance as these operations develop.

At all times and particularly, when travelling to customer mine sites or third-party service provider facilities, the behaviour of our people is guided by a Code of Conduct and supporting Human Rights Policy and Anti-Corruption and Bribery Policy. These affirm the expected standards of behaviour and principles for conducting business including with suppliers. There have been no breaches of these policies in the reporting period.

If any of our people have concerns or grievances, we encourage them to report them through their direct manager in line with a Dispute or Grievance Resolution Procedure. In the next reporting period, we will establish an independent 'whistleblower' service which will receive complaints related to business ethics or human rights. We undertake to investigate any concerns and resolve matters in a fair, equitable and prompt manner.

We assess the risk of modern slavery practices within our operations is low given our centralised workforce in Australia, strong compliance with labour laws, and high visibility of employment arrangements. However, we acknowledge risks may still arise, particularly through third-party labour hire and outsourced services.

INDUSTRY RISK

We consider the potential for Schlam to be exposed to modern slavery practices within our supply chain is a greater risk. Our assessment has identified four potential areas of high-risk.

1. Migrant and low-skilled labour: Certain suppliers may utilise low-skilled or migrant labour who are more vulnerable and susceptible to exploitation. This risk is heightened amongst suppliers of goods or materials which originate in countries that are independently assessed as having high risk to modern slavery [see table 4]. We are obliged to ensure the labour practices of these suppliers are verified to be compliant with Schlam's ethical standards.

2. Lack of visibility: We currently have limited visibility into the labour practices of some second-tier and smaller suppliers who are not obliged by local regulations to report transparently on these policies or modern slavery practices. This risk is heightened in countries assessed as having high vulnerability to modern slavery. The lack of transparency potentially increases the risk of modern slavery practices going undetected. This emphasises the importance of our progress in developing terms and conditions, self-reporting and review requirements with suppliers.

3. Contractual protections: Some suppliers, particularly those with long term relationships with Schlam, do not have robust contractual warranties or covenants addressing modern slavery practices. This gap in our procurement agreements needs to be addressed to mitigate risks effectively with current and future suppliers.

4. Policy and procedures: Some suppliers lack formal policies or processes related to respecting human rights and preventing modern slavery. As a result, whistleblower protections enabling potential human rights breaches to be reported, investigated and remedied are not available within their businesses. Appropriate disclosure practices for these breaches would assist Schlam in identifying and addressing potential issues with these suppliers.

GEOGRAPHIC RISK

Our assessment of geographic risk is based on data available through international human rights group, Walkfree [see table 4]. This shows the majority of our supply chain is sourced from countries assessed as having strong policy responses to modern slavery and low prevalence within their populations. Both Australia and the United States are ranked within the top 10 countries in the world for government responses to modern slavery and with New Zealand, are rated low risk. China has been rated as medium risk in line with Walkfree ratings for the potential level of vulnerability within their population and government response.

Table 4. Source countries by vulnerability to modern slavery

SOURCE COUNTRY	ESTIMATED PREVALENCE OF MODERN SLAVERY (PER 1,000 OF POPULATION) *	LEVEL OF VULNERABILITY TO MODERN SLAVERY *	GOVERNMENT RESPONSE SCORE *	RISK RATING
Australia	1.6	7%	67	Low
USA	3.3	25%	67	Low
China	4.0	46%	40	Medium
New Zealand	1.6	8%	54	Low

*Source: Walkfree Global Slavery Index 2023

DUE DILIGENCE

As our global supply chain expands, discussions are being held with suppliers in countries not currently represented in our portfolio. Before contracting new suppliers, we undertake comprehensive due diligence into the operational, logistical, economic, geopolitical and modern slavery risks in order to help sustain a resilient supply chain. This includes an audit of their policies and practices to verify they operate in line with expectations for sustainable development, are compliant with all local laws including labour rights, and do not have modern slavery practices within their value chain.



4. ACTIONS TO ADDRESS RISKS

The Standard Terms and Conditions for both purchase and sales contracts entered by Schlam include a requirement in relation to modern slavery [see box 1]. Currently, this is supported and enforced through our direct engagement with suppliers.

Box 1. Extract from Standard Terms and Conditions

Modern slavery

51. The Buyer (Supplier) warrants and undertakes that:

- (a) no Forced Labour, Slavery or Human Trafficking (as such terms are defined by the International Labour Organisation) is used anywhere in the Buyers (Supplier's) business or in the operations of any of its Related Entities or suppliers; and
- (b) it has put in place all necessary processes and will take all necessary actions to ensure that the warranties given in this clause 51 continue to be true throughout the term of the Agreement.

During the 2025 financial year, we took initial steps to further understand the risk of modern slavery in our operations and supply chain and to build the necessary governance systems and work practices to minimise the risk in the future. These actions establish a foundation for future reviews and assessments.

IMPROVED GOVERNANCE

As part of a comprehensive review of corporate policies supporting our Company Commitment Charter, we have introduced new policies that are directly relevant to guiding performance, behaviour and action to respect human rights and prevent modern slavery practices.

These are:

- **Code of Conduct:** Sets clear expectations for ethical behaviour, focusing on human rights, high integrity and legal compliance.
- **Human Rights Policy:** Articulates our commitment to eradicating modern slavery and protecting human rights within both operations and supply chains.

SUPPLIER SELF-ASSESSMENT QUESTIONNAIRE (SAQ)

We have developed a Modern Slavery Supplier Self-Assessment Questionnaire (SAQ) to engage with suppliers and assess potential risks within their operations. It includes questions about workers' conditions, company practices, and the availability of any policies related to mitigating modern slavery practices. It is therefore intended to help identify potential risks and provide a framework for improving transparency in our supply chains.

The SAQ was issued at the end of the reporting period to suppliers. The results will be collated in the 2026 financial year and will inform future actions.

REMEDIATION PROCESSES

We have begun a process to consider a formal remediation process in the event that modern slavery practices are reported or identified within our supply chain. To date, none have been reported or identified.

Our current informal process to addressing potential modern slavery risks involves:

- **Internal discussions:** Harnessing the knowledge and capability of the procurement team to discuss perceived or potential risks within the supply chain.
- **Internal compliance:** Ensuring the procurement team complies with internal policies and standards regarding behaviour and supplier relationships as outlined in our improved internal governance systems.
- **Direct engagement:** Where the procurement team identifies a potential risk of modern slavery, we will engage directly with the relevant supplier to proactively discuss and agree on preventative or corrective actions.
- **Reviewing relationships:** Supplier contracts may be reviewed on a case-by-case basis depending on perceived risks and the outcomes of collaborative and proactive discussions.
- **Ending a business relationship:** If previous actions have been unsuccessful and a supplier fails to take agreed actions to prevent or address modern slavery risks, then the business relationship may be ended subject to Schlam's review of the situation and existing contractual covenants.

During the reporting period, consultation with customers focused on understanding their expectations for periodic reporting on modern slavery data and initiatives. Engagement with Tier 1 suppliers captured information about their current policies and practices in relation to modern slavery, including their approaches to identifying and managing related risks. Where available, we also obtained copies of their modern slavery statements and performance metrics to help verify alignment with Schlam's standards.

As we expand these efforts to assess deeper levels of our supply chain, we intend to formalise our remediation process, ensuring clear steps for addressing and resolving any instances of modern slavery, should they arise. Our aim is to develop a comprehensive and structured approach that will allow us to effectively manage and mitigate modern slavery risks as our supply chain assessments evolve.

5. FORWARD PLAN

Over the next 12 months, we aim to focus on the following actions to further develop our systems, processes and strategies to minimise the risk of modern slavery in our supply chain.

1. Supplier engagement

- Continuing to identify, assess and mitigate modern slavery risks within the top 20% of our suppliers.

2. Tracking system

- Updating our systems to enable the country of origin of raw materials and components to be tracked and compared annually.

3. Data collection

- Analysing the outcomes of the SAQ to inform decision-making in relation to procurement covenants or strategies.

4. Onsite audits

- Developing our due diligence processes to incorporate modern slavery risks in the criteria evaluated by supplier audits and site visits conducted in line with contractual conditions.
- These audits currently focus on health, safety, environment and quality compliance. We intend to extend this scope to include modern slavery risks focusing on labour conditions, supply chain transparency, and ethical practices.
- A systematic on-site audit process and schedule will be developed for our key suppliers. This may also include verification of information provided on the SAQ to monitor the information provided by suppliers.

5. Whistleblower service establishment

- Conducting a competitive procurement process to secure an independent service to accept and manage reports of unethical practices in relation to modern slavery, bribery and corruption and human rights in relation to discrimination, bullying and harassment.
- Establishing the service and communicating its availability through internal and external stakeholders.
- Ensuring appropriate procedures are in place for the management of all reports and investigations without prejudice or fear of retaliation for the complainant.

6. Workforce education

- Communicating and implementing our existing Human Rights and Modern Slavery Policy through our operations and supply chain through future onboarding process and workforce development and training opportunities.

7. Investigate alignment with global objectives

- Our Company Commitment Charter sets an aspirational objective for Schlam to be accredited under international human rights standards, guidelines and regulations to protect the rights and welfare of international workers.
- Over the next two years, as our governance system in relation to modern slavery risks and our business grows, we will develop a plan to align our Modern Slavery Statement and strategies to the United Nations Guiding Principles on Business and Human Rights and Voluntary Principles for Security and Human Rights. Specific actions will be informed by ongoing consultation internally and engagement with our customers and Tier 1 suppliers.

6. ASSESSING EFFECTIVENESS

Our approach to assessing the effectiveness of our actions is still developing. During the reporting period, we took several foundational steps to enable future measurement and continuous improvement, including baseline risk mapping, issuing Supplier Self-Assessment Questionnaires (SAQs), and reviewing governance policies. In addition, engagement with Tier 1 suppliers has resulted in no modern slavery risks being reported or identified.

As we work to develop our governance systems to manage modern slavery risks, we plan to establish processes for tracking and assessing the effectiveness of our actions. This will involve:

- **Self-assessment questionnaire outcomes**
Reporting on the number of suppliers proactively identifying modern slavery practices or their risk within their operations as reported by the SAQ.
- **Due diligence processes**
Metrics summarising the outcomes of new due diligence processes which will be developed as part of our forward plan and will introduce modern slavery risk as a compliance criterion within supplier audits and site visits.
- **Whistleblower outcomes**
Data on reported modern slavery practices investigated by the independent whistleblower and any necessary actions arising either in relation to remedial action or continual improvement initiatives.
- **ESG reporting**
Under the inaugural Schlam Environmental, Social and Governance (ESG) roadmap, actions, baselines and targets will be set against the material issue of human rights. This includes metrics specifically associated with the Modern Slavery Statement.

These mechanisms will better enable us to understand the effectiveness of our actions, support continuous improvement, and inform future priorities.

7. CONSULTATION

This statement has been prepared in consultation with Schlam Americas Inc., a wholly owned subsidiary of Schlam Payload.

Both entities are governed by the same Board of Directors and Executive Leadership Team, ensuring a consistent and integrated approach to identifying, assessing, and managing modern slavery risks in our operations and supply chains. Consultation between Schlam Payload and Schlam Americas is highly integrated and occurred through regular engagement at both executive and operational levels, with coordination on policy development, supply chain mapping, and risk assessment activities.

Despite operating in different jurisdictions, both entities have aligned their modern slavery governance practices under a shared framework. Information and insights from Schlam Americas were incorporated into this statement to ensure group-wide representation and relevance.



8. RESPONSIBILITY

Responsibility for global supply chain management is held by the EGM Global Supply Chain within the Global Operations team.

Our global supply chain team is responsible for procurement and planning to ensure our operations have the resources they need to sustain the high quality, low cost and efficient delivery of our products and services across the Schlam business model.

The EGM Global Supply Chain is accountable for the preparation of the annual Modern Slavery Statement and for managing the risks identified within the enterprise risk management system.

To find out more about our approach to managing modern slavery risks or to report a potential modern slavery practice, please contact us:

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