



**BUMA**

Modern

Slavery

Statement

2023

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## Acknowledgement

We acknowledge and pay our respects to the past, present and future Traditional and Tribal Custodians and Elders of the lands, waters and territories on which BUMA Australia conduct its business.



## About this statement

Modern slavery is a global issue that must be addressed whenever and wherever it occurs. It involves the exploitation of individuals' rights and freedoms through coercion, threats, or deception. At BUMA, we are committed to protecting and respecting human rights and adopt a zero-tolerance approach to slavery, exploitation, and human trafficking in all forms. Our vision is to build a modern mining and rehabilitation company that fosters growth, sustainability, and prosperity.

Our core values—people, safety, integrity, collaboration, and progress—underpin our stance against modern slavery. This document is our second annual statement in compliance with the *Modern Slavery Act 2018 (Cth)* (the **Act**). It outlines the measures we took in 2023 to identify, assess, and address modern slavery risks, including the governance processes and progress in our operations and supply chains.

The sections of the Statement outlining our response to the mandatory reporting criteria required by the Act are set out in the table below:

Mandatory Reporting Criteria	Section
Identify the reporting entity and describe its structure, operations, and supply chains	Structure, operations, and supply chains section on pages 4 to 8.
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Risks of modern slavery practices in our operations and supply chains section on pages 8 to 10.
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls, to assess and address these risks, including due diligence and remediation processes	Actions taken to assess and address risks on pages 11 to 12.
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Assessment of the effectiveness of actions section on page 13.
Describe the process of consultation with any entities the reporting entity owns or controls	Consultation section on page 13.
Any other relevant information	Other Relevant Information section on pages 13 to 14.

BUMA's approval and Director signature for this Statement is on page 14.

# Structure, operations and supply chains

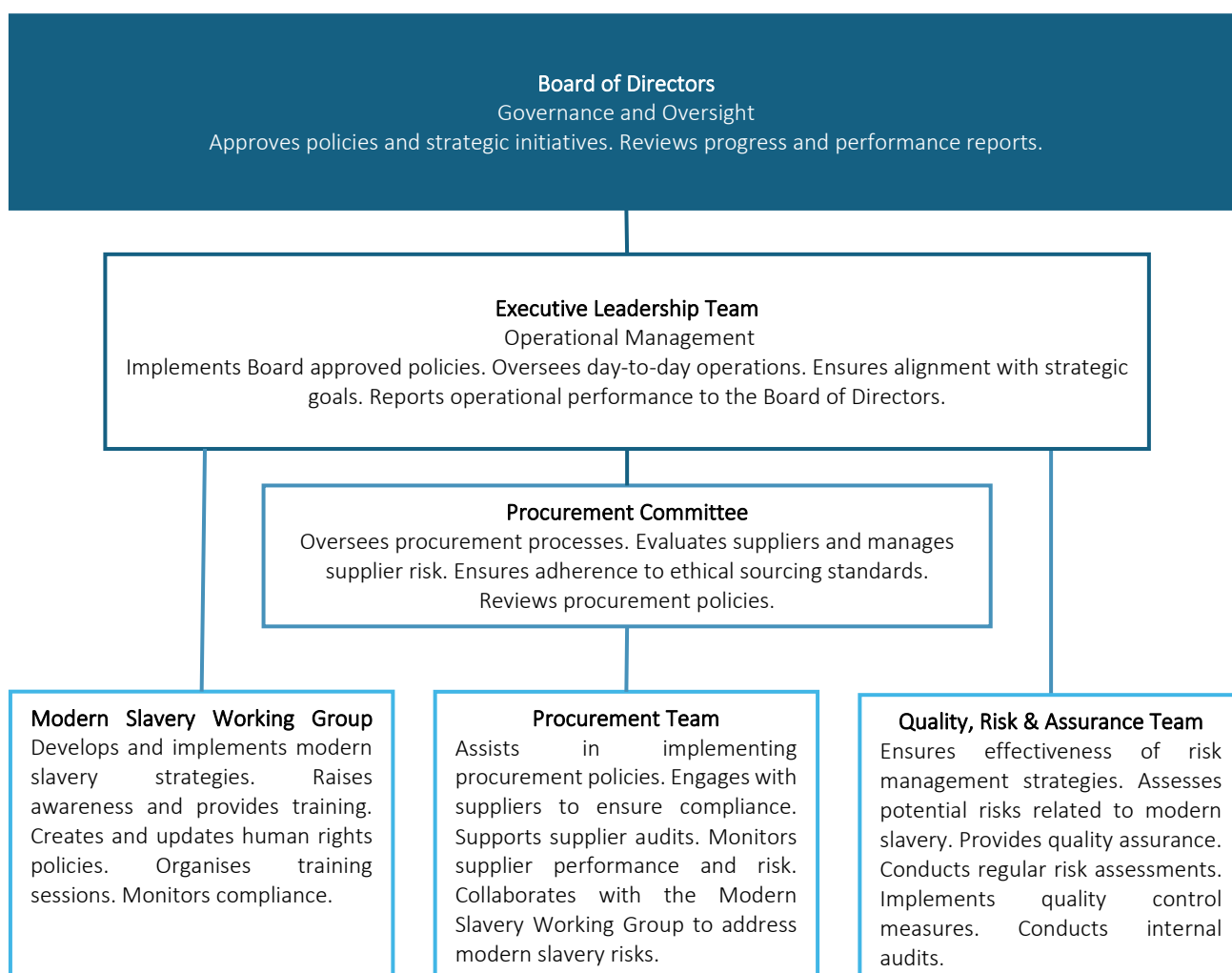
## STRUCTURE

This statement is for BUMA Australia Pty Ltd (ACN 649 634 579) (**BUMA**). In the 2023 reporting period, BUMA’s revenue was greater than AU\$100 million, it therefore qualifies as a reporting entity under the Act. BUMA has no subsidiaries or joint ventures that meet the requirements to be a reporting entity. BUMA operates as part of the Delta Dunia Group, with its ultimate holding company, PT Delta Dunia Makmur Tbk, listed on the Indonesian Stock Exchange.

BUMA employs a comprehensive suite of processes, standards, and practices to support enterprise risk management, developed in line with the ISO 31000 Standard for risk management. The primary standard driving these activities is BUMA's Enterprise Risk Management Framework. This framework relies on an ongoing process of risk identification and assessment, conducted through a cycle of consultation and review. BUMA utilises this same process to assess and mitigate modern slavery risks within its operations, continually attempting to build upon the improvements made to date.

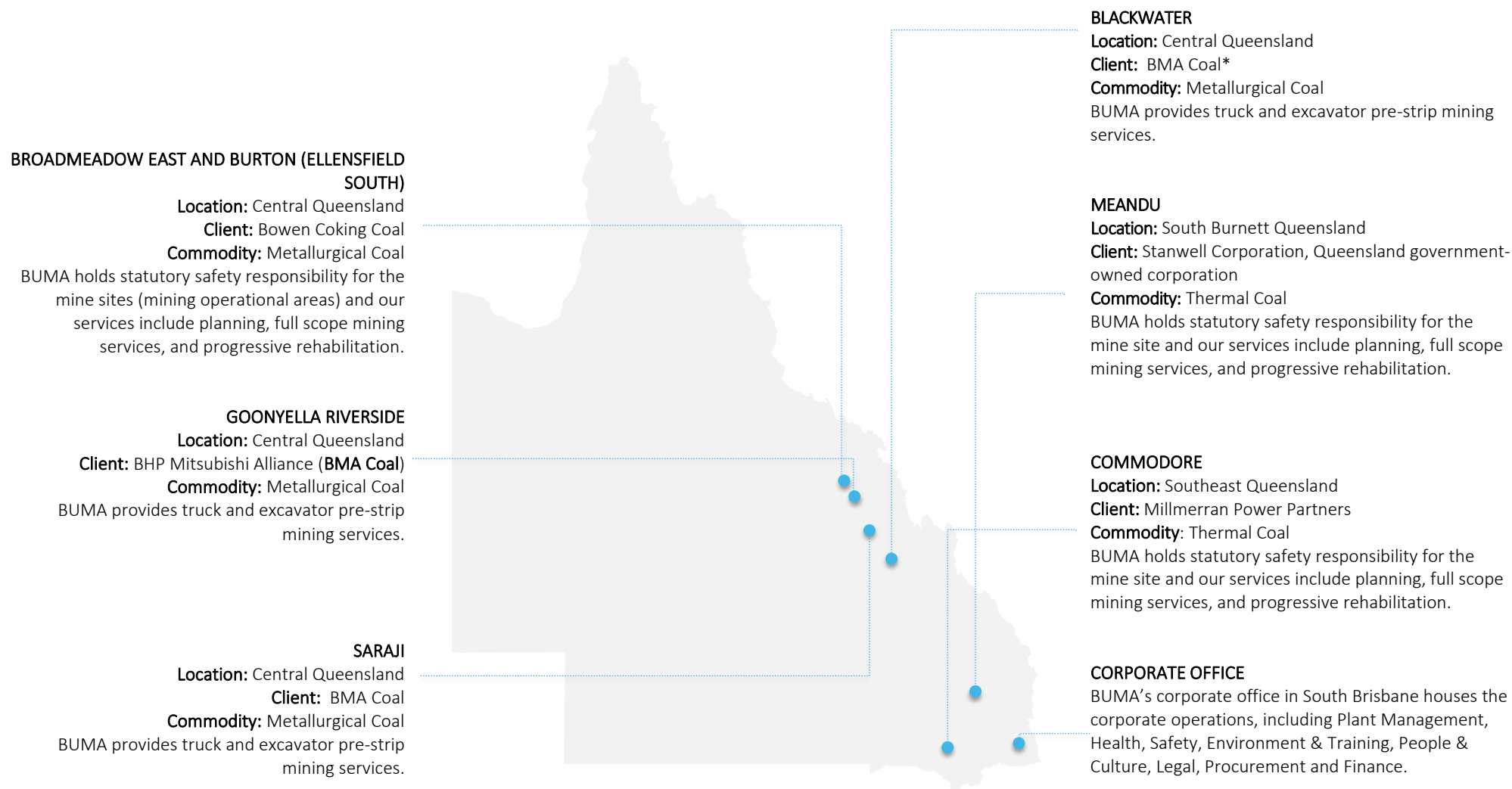
Key components of BUMA’s Corporate Governance include our Enterprise Risk Management Framework, our Board, the Executive Leadership Team, and key staff and groups throughout the organisation. For more information about BUMA's Corporate Governance, please refer to our [website](#).

BUMA’s governance structure in relation to modern slavery is shown below:



## OPERATIONS

As a mining contractor, BUMA's operations centre on delivering high-quality end-to-end mining services in Australia. We have established ourselves as a leading mining services contractor in both the southeast Queensland and Bowen Basin regions. For the reporting period, BUMA provided mining services at the Blackwater, Commodore, Meandu, Goonyella Riverside, Broadmeadow East and Burton (Ellensfield South), and Saraji open cut coal mines, providing employment and substantial economic benefits to the local regions.

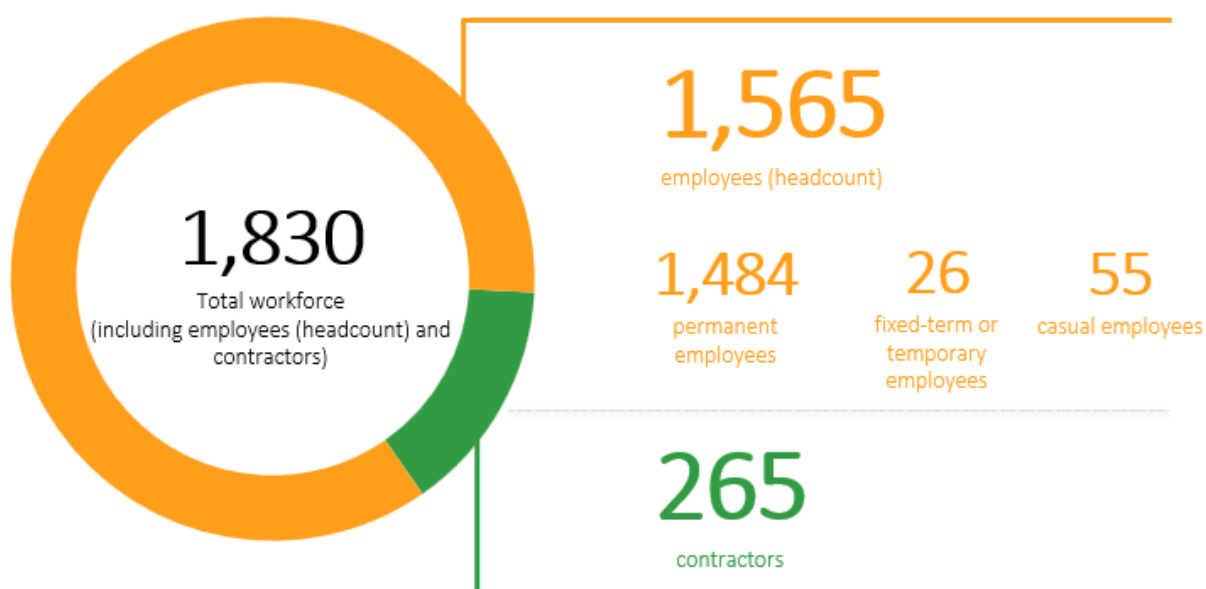


\* Completion of the sale to Whitehaven occurred on 2 April 2024

## Our workforce

We believe our people are our greatest asset and we are dedicated to investing in individual development and providing recognition, encouragement, and direction. We are committed to developing a team comprising motivated individuals from the widest pool of talent available and actively recruiting and developing talent from within the regions we operate.

BUMA works to foster a diverse and inclusive workplace that facilitates opportunity and respect for all our employees, ensuring that our practices align with the principles of the Act. We are dedicated to preventing any form of modern slavery within our operations and supply chains by implementing robust due diligence processes, conducting regular risk assessments, and providing training to our employees to recognise and address modern slavery risks.



## SUPPLY CHAINS

BUMA's transacted with 1,157 direct suppliers from 6 countries, with Australia-based suppliers accounting for 99% of our spending.

**1,157**

Direct suppliers located across  
6 countries

**99%**

Of suppliers are  
in Australia

**65%**

Of those Australian suppliers  
are in Queensland

In 2023, BUMA procured goods and services across a wide range of categories.

Our top categories include:

Category	Description	Percentage
Fuels and Energy	Fuels and lubricants for machinery and vehicles.	13%
Capital Expenditure	Long-term asset purchases like machinery and infrastructure.	11%
Long-Term Equipment Hire	Long-term rental of heavy mining equipment.	14%
Manufacturing Supplies	Supplies and materials for manufacturing and maintenance.	4%
New Components	New parts and components for equipment repair and upgrade.	8%
Tyres	Off-the-road tires for heavy mining vehicles.	3%
IT Operational	IT-related expenses including software, hardware, and services.	2%
Other		45%

Our supply chains are diverse and dynamic networks through which we procure goods and services essential to our operations. Suppliers play a crucial role in helping us achieve our goal of being one of Australia’s leading mining services contractors. Our supply chains largely mirror our operational footprint, with a significant portion of our supplier spending in 2023 directed towards Queensland and Australian-based suppliers.

Percentage of Procurement Spend



Supplier relationships vary based on the nature, term, and value of each engagement. For instance, all strategic supplier relationships are supported by multi-year contracts with mutually agreed-upon key performance indicators and rise-and-fall provisions while smaller suppliers may be engaged through specific contract with negotiated terms appropriate to the supply.

## Risks of modern slavery practices in our operations and supply chains

There has been no significant change in BUMA’s modern slavery risk profile during 2023, with the risks remaining consistent with those faced in the previous year. Below is a summary of the risks relevant to BUMA:

### Supplier risks

In 2023, BUMA established a process to identify where inherent and residual modern slavery risk factors exist and intersect within our operations and supply chains. This process is a crucial part of our Modern Slavery Supplier Due Diligence and involves several key steps:

#### Identification of inherent modern slavery risks

We considered the following inherent risk factors to identify potential risk areas and guide our understanding and prioritisation:

- Vulnerable populations



- Business models
- Sectors
- Geographies.

Our approach acknowledges that the likelihood of actual harm increases when multiple high-risk factors coexist. This methodology was informed by a desktop review.

Desktop review resources included:

- Corruption Perceptions Index—Transparency International
- Global Estimates of Modern Slavery: Forced Labour and Forced Marriage—ILO, Walk Free, and the International Organization for Migration
- Global Slavery Index—Walk Free Foundation.

Recognising that human rights risks are dynamic, we review publicly available resources regularly to align with industry and best practice.

To assess the inherent risk related to the above factors and determine the residual modern slavery risk, we developed a modern slavery supplier questionnaire (**MSSQ**) distributed to all our suppliers via our supplier management system.

### **Priority setting**

We created a spend/risk matrix to evaluate the complexity of our supply categories and identify high-risk and high-priority supply chains.

### **Identification of residual modern slavery risk**

To identify residual risk, we evaluate the responses provided by suppliers in their MSSQ to determine what controls and mitigations the supplier has implemented to minimise their modern slavery risks.

This improved process has only recently been integrated into our procurement procedures. BUMA intends to embed this process as a standard business practice throughout 2024 and complete retrospective analysis on its existing suppliers.

## **Geographic risks**

With 99% of BUMA’s suppliers located in Australia, the geographic risk of modern slavery is relatively low. However, it is important to acknowledge that our understanding of modern slavery risks in supply chains indirectly linked to foreign countries is currently limited.

Our current assessment of geographic risk is primarily based on category risks. These assessments are informed by widely accepted research from modern slavery experts, indicating that certain categories with typically opaque supply chains often trace back to high-risk geographies. High-risk spend categories for us include IT hardware and cleaning services.

In 2024, we plan to conduct further analysis to align high-risk categories with high-risk countries. This will help us identify focus areas and carry out thorough assessments of suppliers within those areas.

## Category risks

BUMA sources a wide range of products and services, some of which are recognized as high-risk categories. These high-risk categories arise due to sector or industry risks, product and service risks, or supply chain model risks. These categories may also be considered high-risk because their supply chains are linked to high-risk geographies or because the nature of the category involves high-risk inputs, regardless of location.

For example, cleaning services, which fall under the Office, Site, and Mining Support category, are recognized as high-risk for BUMA. This is largely due to the labour input involved, which includes risks related to working conditions.

In 2024, BUMA will enhance its capacity to conduct supplier assessments during the onboarding and post-qualification processes. This will enable us to gain a more detailed understanding of modern slavery risks within our operations and supply chains, allowing us to identify, assess, monitor, and address these risks where necessary.

### Procurement and supply chain risks

While we have made progress during the 2023 reporting period, BUMA acknowledges the need for continued review and improvement to enhance our processes and operations to mitigate modern slavery risks. We are committed to continually improving our procedures and developing greater capabilities in eliminating modern slavery, including:

- Sourcing and related due diligence processes
- Contract management and supplier relationship management processes
- Risk identification through ongoing monitoring.



## Actions taken to assess and address risks

In 2023, BUMA took the following actions to assess and address modern slavery risks in our operations and in our supply chains. The image below provides an overview of our modern slavery action plan and key activities for the reporting period.



**12-month Action plan**  
Developed and Implemented



**86% Completion**  
of e-learning modules



**Modern Slavery Policy**  
Developed, Board approved and published



**Working Group Established**  
With representation from Legal, Risk, Governance and Procurement



**Supplier Screening & Onboarding**  
Developed and implemented process for supplier onboarding



**Modern Slavery Clauses**  
Developed and implemented into contract templates

### BUMA's modern slavery action plan

#### Data analysis capability to identify risks

Currently, BUMA extracts spend data from our systems to support modern slavery risk assessment. With the addition of Business Intelligence reporting, this data can now be extracted monthly, enhancing our ability to identify and address risks.

#### Supplier screening and onboarding

As mentioned in the previous section, all suppliers, regardless of spend or risk, are now required to complete a MSSQ at onboarding. Additionally, all existing suppliers as of 1 January 2023, have been asked to complete the questionnaire via our supplier management platform. This questionnaire contains an extensive set of questions, allowing our Procurement team to conduct a desktop audit of each supplier's modern slavery risk.

Our Legal team reviews publicly available information on potential suppliers, including media reports and financial crime databases. If any modern slavery or human rights concerns are identified, they are referred to our Quality, Risk & Assurance team for further investigation, which may include detailed risk assessments, supplier audits, and engagement to address and mitigate risks. The Head

of Legal will decide whether to proceed with contracting the supplier or require additional compliance measures.

### **Contract templates review and implementation**

BUMA's template contracts have been updated to require suppliers to:

- ensure they take all reasonable steps to ensure no modern slavery is present in their supply chains
- provide training to its employees on the risks of modern slavery and on BUMA's policies and procedures with respect to same
- warrant they have not been convicted of an offence relating to modern slavery and that they will not breach any modern slavery legislation and inform BUMA of any contravention; and
- comply with any requests from BUMA to comply with all modern slavery legislation, including providing information and documents.

This contract position has been taken forward in any new or renewed supplier engagements.

### **Modern slavery policy**

BUMA's Modern Slavery Policy outlines our commitment to respecting human rights across our operations and supply chains. It aims to ensure a safe work environment free from forced labour, unlawful child labour, exploitation, human trafficking, and other forms of modern slavery as defined by the Act. We source goods, products, and services from suppliers who share our commitment to minimising modern slavery risks and maintaining ethical operations and supply chains. This policy is published on our website and is communicated to all employees through mandatory training.

### **Internal training**

We reviewed our enterprise training modules and introduced a full suite of compliance e-training, now included in new starter and annual refresher modules. There are two modern slavery training modules: the general module, which introduces modern slavery and how to recognise, report, and prevent it; and a second module for management and specific roles, which focuses on preventing modern slavery in supply chains and understanding the requirements of the Act.

### **Modern slavery working group**

Our Modern Slavery Working Group met four times to support the implementation of our commitments to understand and reduce modern slavery risks across our operations and supply chains. The group promotes collaboration across the organisation and includes representatives from Legal and Risk, Governance, and Procurement. The standing agenda includes a performance update and a broader review of recent due diligence activities, the effectiveness of our initiatives, and support for integrating modern slavery controls into our business planning and processes. In 2024, we will continue to identify themes and activities for the Working Group, including expanding its representation to include People and Culture and Operations

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## Assessment of the effectiveness of actions

At BUMA, we understand that monitoring and reviewing our initiatives to eliminate modern slavery from our operations and supply chains is essential for improving our approach and addressing emerging issues over time.

Throughout 2023, we tracked and evaluated our approach in several ways:

- We consistently evaluated our Modern Slavery Action Plan to measure our progress against our goals
- We engaged with the Modern Slavery Working Group to share best practices and enhance cross-functional collaboration
- We monitored our e-training programs to track completion rates across our employees.

BUMA has taken effective action and continues to make progress in identifying and addressing modern slavery risks in our operations and supply chains. We plan to expand our activities aimed at reducing these risks and will develop performance criteria for the 2024 reporting period.

## Consultation

Consultation on addressing modern slavery was conducted within BUMA. Since BUMA is the reporting entity and is not representing any other entities, no additional consultation was required.

## Other relevant information

### 2024 road map

In 2024, we aim to establish key performance indicators (**KPIs**) to track our progress towards eliminating modern slavery in BUMA's supply chain. These KPIs will provide us with targets and milestones, enabling us to gauge our progress and make informed decisions. By monitoring these indicators, we can identify areas of strength and weakness, optimise our performance, and consolidate successful strategies.

Our focus areas will include:

- Implementing and utilizing a modern slavery risk management tool to identify and manage risks effectively
- Enhancing contract management practices to better consider and address modern slavery risks
- Refining our strategy for assessing and managing suppliers with a high-risk rating for potential modern slavery risks
- Creating and implementing a grievance and remediation process specifically for modern slavery issues

- Collaborating with key stakeholders to embed modern slavery risks into our risk management framework
- Building the capability of our suppliers and staff to identify and address modern slavery risks by sharing awareness and learning materials.

## Declaration

This statement is made pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and constitutes the Modern Slavery Statement of BUMA Australia Pty Ltd for the year ending 31 December 2023. The statement has been approved by the Board.



**Colin Gilligan**

Chief Executive Officer, BUMA

