

# Modern slavery statement

Enaex Australia Pty Ltd ACN 009 687 487

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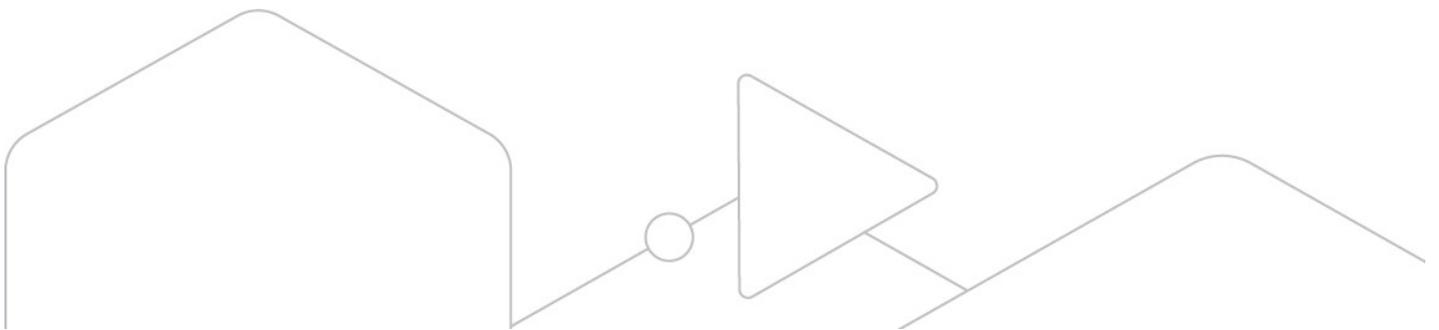
## Introduction

- 1 We are committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply networks.
- 2 This statement, which is intended to meet the requirements of the *Modern Slavery Act 2018* (Cth) (**Act**), describes the steps taken by Enaex Australia Pty Ltd ACN 009 687 487 (**Enaex, we, us, our**) during the period 1 January 2024 to 31 December 2024 (**Reporting Period**) to seek to minimise the risk of modern slavery occurring in our business and supply networks.
- 3 This statement includes and describes our structure, our operations and our supply networks, risks of modern slavery in our supply networks and operations, the actions we have taken to address such risks during this Reporting Period (based upon those steps included in our previous modern slavery statement for the reporting period ending 31 December 2023), mechanisms we have in place to assess our risk management processes established to address modern slavery and our future actions for the next reporting period.

## Business overview

### Our structure and operations

- 4 We are a wholly owned subsidiary of Enaex S.A. and form part of Sigdo Koppers, a Chilean based conglomerate. Enaex Australia does not own or control any entities and are the reporting entity in accordance with the Act.
- 5 We provide blasting and explosives products and services to open pit and underground mining projects across Australia. We operate multiple offices, operational sites and five manufacturing plants in Australia with 300 employees across these locations. More information on what we do and our operations can be found on our website at [www.enaex.com/au](http://www.enaex.com/au).
- 6 We rely on a small number of contractors within our workforce to assist with the operations of the business, and whilst we understand there are heightened risks of modern slavery associated with contractors, Enaex ensures contractors are sourced from local companies (where possible), due diligence is undertaken on the companies prior to engaging the contractors and such contractors are regularly audited.
- 7 We are committed to ensuring we have a safe and sustainable work environment and continually improving the transparency within our business. We do not tolerate any instances of modern slavery within our supply networks or operations. We continue to commit to continuously



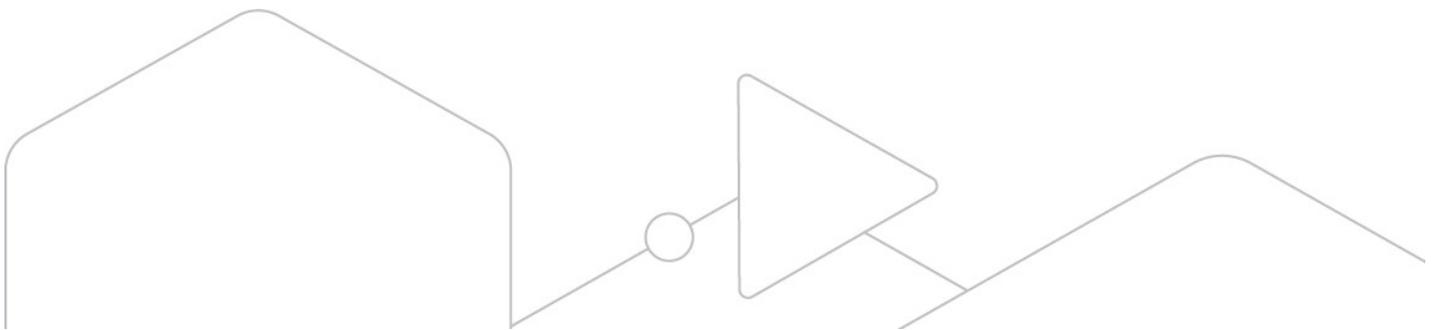
improving our practices in managing the risks of modern slavery internally within our business and externally with our suppliers, contractors and business partners within our supply networks.

### **Our supply networks**

- 8 Externally purchased materials, services and equipment represent a 79% share of our cost of sales.
- 9 These include raw materials including parts oils and lubricants, bulk explosive precursors, packaged explosives and initiation systems, other equipment as well as other key categories including IT, property, construction, engineering and technical services, uniforms and personal protective equipment, corporate services, telecommunications, and transport services.
- 10 During this Reporting Period, our procurement expenditure on our goods and services was approximately \$324 million. We acknowledge that a number of factors, including our global supply networks, contribute to Enaex being potentially exposed to modern slavery risks.
- 11 As a way of decreasing our exposure to modern slavery risks, we aim to engage as many local businesses and contractors as possible. We currently work with a majority of local Australian suppliers. 98% of our suppliers are from within Australia and we therefore consider Enaex Australia's direct risk of modern slavery to be low.
- 12 In terms of our global supply networks outside of Australia, we have suppliers from France, Brazil, China, Lithuania and India, with the [Global Slavery Index](#) ranking the risks of modern slavery in these countries as low (France, Brazil, China & Lithuania) to medium (India).

### **Modern slavery risk assessment and identification**

- 13 We understand there are several modern slavery risks to consider as an organisation, with such risks identified either causing, contributing to or being directly linked to modern slavery practices.
- 14 We aim to identify any risks primarily through due diligence practices, training, our procedures and policies and risk management systems which are reviewed and updated regularly.
- 15 In identifying the risks, we have considered our product risks, sector risks and geographical risks of suppliers.
- 16 The most significant modern slavery risks associated with our supply networks during the Reporting Period were identified as being:
  - (a) Bulk explosive precursors and raw materials including chemicals; and
  - (b) High explosives.
- 17 Other high risks areas include the supply of personal protective equipment in a competitive market, where it is common for suppliers to seek reduced cost forms of production to stay competitive.
- 18 The risks listed above pose as the most significant risk due to either:



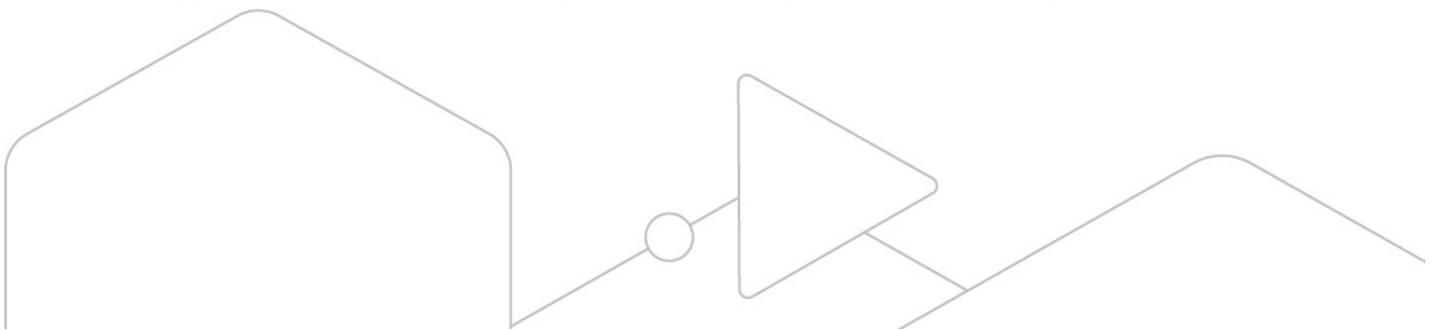
- (a) being sourced from overseas suppliers, manufacturers and distributors, especially those within countries classified as having a higher prevalence of modern slavery due to poor governance, poverty or compromised rule of law; and
  - (b) the possibility that our suppliers and manufacturers, and their supply networks, particularly those who supply uniforms, chemicals and high explosives, are involved in modern slavery practices such as forced or compulsory labour, poor working conditions, wage exploitation and/or excessive working hours.
- 19 We are committed to continuing to better understand the risks mentioned above and improve our approach to addressing such risks.
- 20 In this Reporting Period, we did not become aware of any instances of modern slavery or any breaches of our modern slavery policy, within our business operations or supply networks. We continue to remain alert to any risks of modern slavery and continue to improve the due diligence we conduct on our suppliers and manufacturers each future reporting period.

## **Modern slavery risk management and actions undertaken in this Reporting Period**

- 21 During the Reporting Period, various measures were in place to manage the risks of modern slavery practices occurring in our operations and supply networks including:
- (a) policies and procedures;
  - (b) due diligence and risk assessment mechanisms;
  - (c) engagement and consultation with relevant stakeholders; and
  - (d) employee and supplier training and engagement.

### **Policies and procedures**

- 22 We have a number of key policies in place to manage the risks of modern slavery within our operations and supply networks, which are reviewed and updated regularly. These include our:
- (a) Modern Slavery Policy (*POL-FIN-ENA-001*), which is designed to increase awareness and assist us in ensuring that any suspected or actual modern slavery taking place within our business or in any of our supply networks is reported so it can be addressed. This policy outlines our commitment and our employees' commitment to prevention, detection and reporting of any modern slavery within our operations or our supply networks;
  - (b) supplier due diligence questionnaires, which our suppliers are required to complete and return to us to assist us in identifying potential or actual instances of modern slavery. We do not engage with suppliers who do not adhere to this requirement. In this Reporting Period, all suppliers adhered to this requirement;
  - (c) Code of Conduct Standard (*STD-HRM-ENA-003*), which sets out our expectations of



employees to ensure that Enaex Australia builds stronger bonds, complies with our legislative obligations, and maintains the trust of our people, customers, communities, governments, contractors, suppliers and other stakeholders; and

- (d) Our Whistleblowing Global Policy (*POL-FIN-ENA-002*) which facilitates anonymous and confidential reporting of any concerns regarding modern slavery risks within our operations and our supply networks, with such a policy also offering protections for whistleblowers and outlining the investigation processes undertaken when a report has been made.
- 23 These policies are communicated on a regular basis to all Enaex employees and can be accessed on Enaex Australia's intranet.

#### **Due diligence and risk assessment mechanisms**

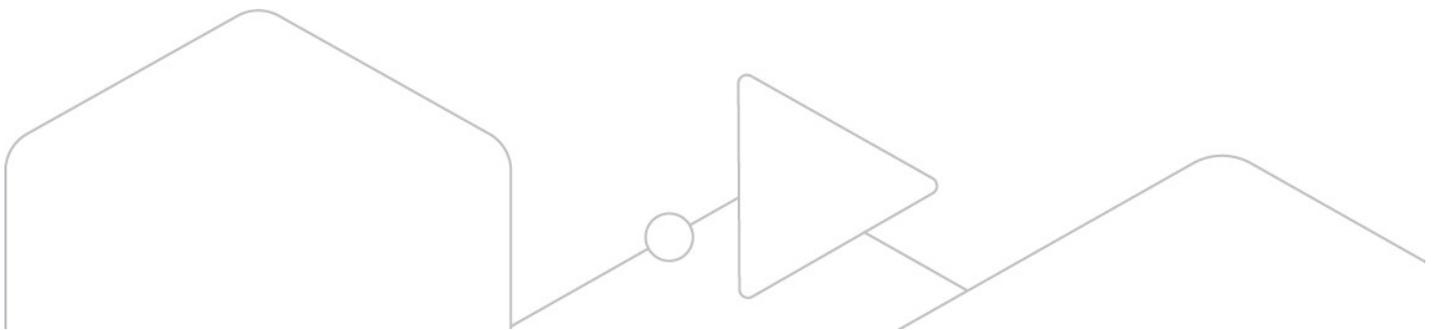
- 24 We continue to explore and consider the introduction of a due diligence and risk assessment system in addition to our supplier due diligence questionnaires, which will assist in not only identifying any risks of modern slavery with our suppliers, but also identifying any broader modern slavery risks and tracking our process in addressing such risks once identified.
- 25 In the circumstances there are confirmed cases of modern slavery practices within a suppliers' operations or supply network, we will notify and take action in remedying the issue in the appropriate manner immediately.

#### **Engagement and consultation with relevant stakeholders**

- 26 We understand an effective way of identifying and managing any risks of modern slavery within our business and our supply networks is by continuing to build upon our relationships with suppliers, contractors and key stakeholders (including the local community, associated government entities and any industry connections).
- 27 We communicate with key stakeholders and suppliers on a regular basis to ensure transparency in information shared and any reports of modern slavery risks.

#### **Employee and supplier training and engagement**

- 28 We provide high-level training to key management employees and any new employees regarding the risks of modern slavery within our business, our Modern Slavery Policy and Statement and any actions undertaken. This includes training on how to identify modern slavery practices and the particular parts of our operations and supply networks that are subject to a greater risk of modern slavery, actions which should be undertaken when a risk (real or potential) is identified, and our expectations in mitigating and managing any modern slavery risks. This training will also form part of the induction process for relevant individuals, whether as an employee or a contractor.
- 29 We also provide regular communication on any changes or increased modern slavery risks, or the introduction of any mechanisms in decreasing modern slavery risks we have since implemented.



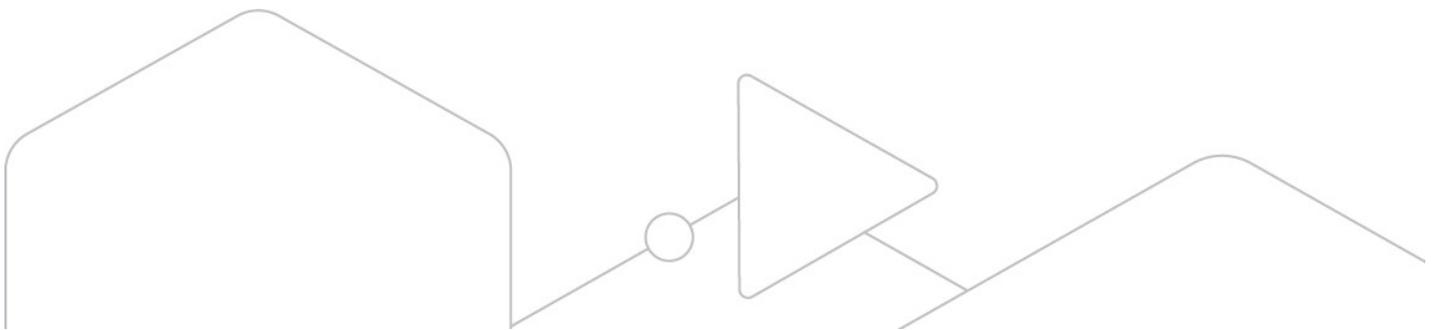
## Assessing our effectiveness in combating modern slavery

- 30 We understand the importance of assessing the qualitative and quantitative effectiveness of our actions in addressing modern slavery risks within our operations and supply networks.
- 31 We measure how effective we have been to ensure that modern slavery is not taking place in any part of our business or supply changes using various metrics which have been summarised in the following table:

| Action  | Metric   | Details   |
|---|--|---|
| Policies and procedures                       | Number of instances of issues concerning modern slavery identified from ongoing monitoring under relevant policies and procedures.<br>Number of people who reported issues concerning modern slavery | During this Reporting Period, there were no incidents identified or reported concerning allegations of modern slavery within our operations or supply networks. |
| Employee and supplier training and engagement | Number of people within our business who received modern slavery training.   | During the Reporting Period, we delivered modern slavery training to key procurement & sourcing personnel.  |
| Supplier due diligence questionnaire          | Number of suppliers who did not adhere to completing the supplier due diligence questionnaire.   | During this Reporting Period, no suppliers did not adhere with an issued supplier due diligence questionnaire.  |
| Stakeholder engagement                        | Number of stakeholders who were contacted and engaged with during this Reporting Period.   | During this Reporting Period, six high value vendors were contacted and discussions were had regarding modern slavery risks and practices.                      |

## Future commitments

- 32 We recognise the importance of continually improving our processes in managing and mitigating modern slavery risks within our operations and supply networks. We have identified the following actions to undertake in our next reporting period:
- (a) incorporate modern slavery provisions into our contractual terms and conditions with suppliers and contractors (for example, supply contracts and supply terms and conditions);
  - (b) reviewing and updating our policies and procedures (including and not limited to our code of conduct, supplier questionnaires and modern slavery policy);



- (c) ensuring we establish key performance indicators used to assess the effectiveness of our actions to mitigate modern slavery risks; and
- (d) increasing communication with all high-risk suppliers we engage with. This will ensure we better understand their workplace environment, work conditions, their supply networks and we assist in encouraging better practices.

## Consultation and approval

- 33 Whilst we do not have any subsidiary companies, we ensure that we still consult with Enaex S.A. (which forms part of Sigdo Koppers, a Chilean based conglomerate), and any of its controlled entities for the purpose of this statement and increasing awareness. Consultation is undertaken through continuous and regular communication and reviewing of any statements, procedures and policies we adopt.
- 34 We continue to ensure that we maintain the same management systems, frameworks, policies and procedures of the companies within our Group structure, and we acknowledge our moral and legal obligations, and aim to continue to strengthen our mitigation and management of modern slavery risks for future reporting periods.

## Oversight and governance

This modern slavery statement was approved by the Board of Directors of Enaex Australia Pty Ltd ACN 009 687 487 on 23<sup>rd</sup> July 2025 and signed by Edmundo Jimenez, the Chief Executive Officer and director of Enaex Australia Pty Ltd ACN 009 687 487.



Edmundo Jimenez  
Chief Executive Officer

31<sup>st</sup> July 2025

