



RJ Vincent (RJV)

Modern Slavery Statement 2020

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1. Introduction

Ralmana Pty Ltd trading as R.J. Vincent & Co. (RJV) ABN 93009149106 and its subsidiaries, value excellence, safety, respect, effort, teamwork and accountability. These values are the foundation of how we conduct ourselves and interact with each other, our clients, suppliers, contractors and other stakeholders.

RJV is subject to the Modern Slavery Act 2018 that commenced operation on 1 January 2019. The Act requires reporting entities subject to the Act, to produce an annual modern slavery statement. Our first annual statement is due on the 31st March 2021.

We are committed to operating our business lawfully and ethically, ensuring that all aspects of our business practices, including our supply chains and contracting networks, are free from any form of slavery. We reject any and all forms of modern slavery which can take the form of unpaid or underpaid servitude, human trafficking and forced labour. We are dedicated to implementing effective systems and controls to ensure that it does not take place within our own business and we expect our suppliers and contractors to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking and child labour.

In FY20, we started a detailed analysis of the risk of Modern Slavery in RJV operations and supply chain. While our analysis, shows that the risk is relatively low, we are implementing several initiatives to minimise the risk of Modern Slavery within our business operations.

This statement reflects our commitment to respecting Human Rights and highlights key actions we are taking to address risks in our own operations, and our supply chain, including risks associated with modern slavery. We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection, staff inclusion and diversity. The statement supports the Australian government's work on modern slavery.

2. Structure

2.1. Business Outline

RJV is a privately owned Western Australian company, based at 4-5 Kirke St Balcatta WA 6021. Founded in 1955 to initially provide bulldozing services in country areas of Western Australia the company has since evolved to become one of Western Australia's leading and most respected Civil Engineering and Mining Services contractors.

Our Mining Services division is one of Western Australia's primary Open Pit Mining contractors, with multiple years of experience and knowledge servicing the Western Australian resources sector. RJV has become a partner of choice through our diversified capability in the resources sector including gold, iron ore and mineral sands. With a highly experienced and stable leadership group we bring a knowledge base and stability rarely seen in mining.

Our Civil Infrastructure division has set its foundation on being one of the Western Australia's leading Civil Infrastructure contracting companies in both the resources sector and the local domestic market. Our experience and knowledge base is unrivalled with continuing repeat clients looking to us to deliver the highest quality of work safely, on-time and to specifications. Our team from management through to operator, is vastly experienced and dedicated to safety and best practices in the field, utilising our extensive fully owned fleet of plant and equipment.

RJV's People & Culture and Risk & Compliance teams have various policies in place that support our day-to-day operations and corporate governance to ensure all employees and suppliers meet our core values. Our scope of services cover:

- Load and Haul Operations
- Bulk Earthworks & Rehabilitation
- Urban Development
- Tunnels & Bridges
- Underground Services
- Road Construction
- Culvert Installation
- Drill and Blast
- Project & Statutory Management
- Tailings Storage Facility Construction
- Hard Rock Quarry Operations
- Haul Road Construction & Maintenance
- ROM & Waste Dump Management
- Topsoil Removal & Management
- Concrete Installation and Removal
- Crusher Feed

2.2. Workforce

At the end of FY20 RJV had a workforce totalling approximately 160 people, employed on a full time equivalency basis. This included 120 employed directly and approximately 40 employed through a number of local specialised labour hire companies.

RJV has policies and procedures in place to ensure that all direct employees are screened, on-boarded and employed in a manner that mitigates the risk of Modern Slavery.

Under our terms and conditions, all labour hire suppliers are required to comply with RJV policies and code of conduct.

The business strives to ensure that all employees and contractors are aware of their rights and responsibilities by providing information, policies and a grievance mechanism for individuals to raise concerns and a process to resolve any issues raised.

3. Supply Chain

During FY20 RJV began working on an analysis to review probability of the risk of Modern Slavery occurring within the supply chain. The risk within the business is minimised by the fact that all business services are conducted solely within Western Australia.

Machinery used in civil construction are sourced from Tier 1 suppliers, that have offices based in Australia and have advanced policies and procedures in place, along with quality systems. Parts are purchased to service and maintain this equipment and these parts are all sourced from local suppliers, as are uniforms and other business consumables.

Service providers including Labour hire who source labour and services locally, predominantly work under RJV's Audited Safety, Quality and Environment systems.

RJV has a subcontractor and supplier prequalification process which must be completed for any business that will be providing goods and services. This process includes agreement to Modern slavery requirements. Terms and conditions are currently under review and being updated where necessary, to ensure that suppliers and contractors are made aware and have systems in place to meet these requirements.

4. Policies and Procedures

RJV does not tolerate any form of slavery, human trafficking, forced or child labour. We have formal policies in place that are intended to promote the values of the business along with ethical and legally compliant business conduct. Our policies contribute to our commitment to prevent

violations of human rights in our business, they including our Code of Conduct, Whistle-blower Policy and Corporate Social Responsibility Policy.

Our policies set out conduct expectations and apply to all employees, contractors and consultants. These policies are reviewed and updated on a regular basis to ensure that they remain current and compliant.

4.1. Whistleblower Policy

RJV values the people who work within the business and encourages a culture of openness, where employees can raise concerns about any business conduct or practices. The Whistleblower policy establishes a mechanism, so that staff and contractors can freely and anonymously (if desired) report conduct that goes against the ethics and values of the business. This includes raising any concerns of Modern Slavery within the RJV supply chain.

5. Potential Risks

In preparation for our first annual statement RJV are reviewing potential risks of modern slavery practices across our operations and supply chains using the RJV Risk Management Framework.

During this assessment process, we have considered risks that may possibly cause, contribute or be directly linked to modern slavery practices. The results from this assessment process have identified areas within the supply chain that have different risk profiles. For example areas with lower risk include operational activities that are directly undertaken by RJV employees and contractors who are covered by our internal processes.

This process has also identified some potentially higher risk areas e.g. where a local supplier may source a product from overseas sources. We are using these potential risk scenarios to prioritise our supplier engagement activities over the next financial year (FY2021).

We have also identified that risk is minimised by sourcing equipment through local reputable suppliers with audited quality systems in place, rather than buying directly from overseas. This also increases our ability to meet with suppliers, agree terms and conditions, develop ongoing relationships and audit supplier processes.

6. Actions

6.1. Actions Taken in FY20

The actions taken in FY20 to gain greater understanding of the RJV supply chain and to combat any risk of Modern Slavery include:

1. Due Diligence
 - Mapping out the RJV supply chain and assessing potential Modern Slavery risks.
 - Included supplier risks of Modern Slavery within our risk register.
 - Updating our supplier pre-qualification system, and supplier terms and conditions.
 - Updating QA procedures to incorporate Modern Slavery requirements.
2. Company policies
 - Reviewed policies to incorporate Modern Slavery risks where appropriate.
 - Developed whistleblower policy and reporting mechanism.

3. Training

- Development of training package in Modern Slavery.
- Onboarding process reviewed, so that awareness of the risks of Modern Slavery can be raised.

6.2. Commitment

RJV has updated and implemented processes and practices in the business, including a review of the procurement process and updating terms and conditions to minimise the risks of modern slavery within the supply chain.

Over the next 12 months RJV are committed to enhancing the measures already taken and continue developing greater understanding of the supply chain and partner processes.

7. Measure of Effectiveness

The actions taken to review and update the subcontractor and supplier pre-qualification process along with updating policies, implementing a Whistleblower procedure and amending terms and conditions appear to have been effective in increasing awareness and reducing risk of Modern Slavery within the business. We will continue to monitor compliance of the actions put in place and commitments made through our quality systems and annual review of policies.

This Statement has been prepared to meet the seven mandatory criteria set out in the Commonwealth Modern Slavery Act 2018 and was approved by the RJV Board of Directors on 30/03/21



Tim Ryan
Chief Executive Officer
10th June 2021