

MODERN SLAVERY

MGM BULK PTY LTD

STATEMENT

FINANCIAL YEAR 24 / 25



MGM BULK IS PROUD TO PRESENT OUR MODERN SLAVERY STATEMENT FROM FINANCIAL YEAR 2024 TO FINANCIAL YEAR 2025

MGMBULK

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➤ STATEMENT BY DIRECTORS

Section 1 . 0

MGM Bulk Pty Ltd ACN 165 448 920, registered office 7 Wellington Street, Bunbury WA 6230 (MGM Group), recognises that we have an on-going obligation to identify, prevent and manage the risk of modern slavery and slavery-like practices within our business operations and supply chain network.

Modern slavery including eight types of serious exploitation: human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and child labour, will not be condoned by MGM Group. Modern Slavery practices and those individuals or organisations that enable Modern Slavery to exist, are not aligned with the MGM Group values of "Honesty, Integrity and Excellence".

MGM Group is committed to playing our role in eliminating the risk of modern slavery in our operations and supply chain network and therefore we will continue to assess our practices and those within our supply chain to submit annually our modern slavery statement.

This statement has been published for the 2025 Financial Year in accordance with the plans for Financial year 24-25 of the Modern Slavery Act 2018 (the Act') and sets out the steps taken by MGM Group for the reporting period.

➤ OUR HISTORY & STRUCTURE

Section 2 . 0

MGM Group was founded in 2004 by Mario Giacci together with his daughter Giuditta (Giudi) and son Michael.

MGM Group has 65 years of experience within the bulk haulage industry, servicing mining companies that require bulk haulage, transport of controlled waste and dangerous goods, warehouse services, storage management, quarrying operations, maintenance of heavy vehicle and machinery, ship loading, rail loading and stockpile management services. We are a national Australia wide business; however, a significant amount of our services is provided to mining clients all over Western Australia.

In 2014, MGM Group added a bulk division to its operations, known as MGM Bulk. MGM Bulk operates in Western Australia within four regions across the state including, Bunbury (head office location), Picton, Perth, and Port Hedland.

MGM Bulk has a workforce of 657 employees and over 536 suppliers including local, national, and international suppliers.

MGM Bulk's first reporting period was FY 2021-2022.

MGM Bulk acknowledges that it is required to submit its modern slavery statement within six months from the end of each reporting period.

➤ OUR SUPPLY CHAIN

Section 3 . 0

In the 2024-2025 financial year period, MGM Bulk's supply chain grew to over 536 suppliers that includes local, national, and international suppliers who provide a range of multi-layered goods and services through various industries. Of those suppliers, the major sectors in which they operate include:

- Mining, exploration and development.
- Accommodation providers
- Tyre supply and services providers
- Information Technology and Technology Support
- Road transport equipment manufacturing and servicing
- Fuel, petroleum products and consumables for power stations and gas infrastructure
- Freight and transportation services

During the reporting period, MGM Bulk identified 23 critical suppliers, and they were assessed based on how critical their services are to the operations of MGM Bulk, their scale, volume and value of services.

➤ OUR RISK ASSESSMENT OF MODERN SLAVERY PRACTICES

Section 4 . 0

➤ SUPPLY CHAIN ASSESSMENT

Section 4 . 1

To assess the risk of modern slavery within our supply chains, we have undertaken a high-level analysis of our critical suppliers using publicly available material and the responses to our Modern Slavery Questionnaires. The following risk categories were also considered while assessing our critical supplier's risk profiles:

SECTOR AND INDUSTRY WEEKS

Consideration as to the high prevalence of the modern slavery practices based on the industry or sector the supplier belongs to.

Consideration as to how formal or unregulated the sector or industry is.

the visibility of the suppliers over lower tier suppliers

PRODUCT AND SERVICE RISKS

Consideration as to the high prevalence of the modern slavery practices associated within a particular good or service.

Particular products or services may have a higher risk because of the way they are produced, provided or used.

Consideration as to the type of labour (manual, low skill) and wages of labour staff.

GEOGRAPHIC RISKS

Consideration as to the high prevalence of the modern slavery within a particular location or where the service is sourced from.

Particular countries have higher risks of modern slavery due to poor governance, weak rule of law, conflict, corruption, socio - economic factors

SUPPLY CHAIN MODEL RISKS

Consideration as to the high prevalence of the modern slavery practices associated within a particular supply chain.

Consideration as to the scale and complexity of the supply chain.

Consideration as use of labour hire recruiters.

MGM Bulk is committed to the on-going assessment of suppliers in addressing and eliminating the risks of modern slavery practices within our operations and supply chain network. By mapping out our critical suppliers we are able to identify potential risks and ensure the visibility of our own supply chains.

If modern slavery is suspected or identified within any of our suppliers or within their supply chains, MGM Bulk is committed to working with suppliers to remedy the issue in the first instance using proactive steps to support the supplier's modern slavery risk management approach.

➤ OUR RISK ASSESSMENT OF MODERN SLAVERY PRACTICES

Section 4 . 2

MGM Bulk have not identified any instances of modern slavery within our operations or supply chains. Although we have not yet identified any instances of modern slavery within our operations or supply chains, there have been two areas identified for potential occurrences:

1. Employee relations
2. Supplier Management

Through our internal risk assessment, MGM have identified that these two areas are currently well managed with our existing controls that we regularly review.

➤ SUPPLIER ASSESSMENT

Section 4 . 3

To ensure that we meet our on-going commitment to eliminating the risk of modern slavery within our operations and supply chain, MGM Bulk engaged legal services to collaboratively develop a questionnaire designed to assist us in assessing modern slavery risks within our existing suppliers. MGM Bulk continue to improve upon this questionnaire each reporting period.

The MGM Bulk modern slavery questionnaire assesses a supplier's current practices relating to modern slavery, policies, their visibility over their supply chain and the supplier's response to findings of modern slavery practices within their networks.

The engagement of our suppliers and response to the questionnaire were satisfactory and no modern slavery breaches were disclosed or otherwise identified.

➤ TRAINING

Section 4 . 4

MGM Bulk are committed to providing training, resources, and education to all employees responsible for procurement and contracting within the business. We have undertaken a review of our existing policies and procedures to ensure all employees have access to support and development relating to modern slavery.

MGM Bulk have maintained the Modern Slavery training for all staff within the organisation. This training is performed initially during the onboarding of staff, and further training is provided during their employment.

The training has provided important education for our staff that are responsible for the procurement of goods or services and with direct influence on our suppliers, as well as educating general staff on Modern Slavery risks that are present in modern time.

➤ ACTION PLANS

Section 5 . 0

➤ REPORTING PERIOD – FINANCIAL YEAR 2024–2025

Section 5 . 1

During the last reporting period, MGM Bulk was committed to meeting our obligations to understand and eliminate the risk of modern slavery within our operations and supply chain network.

The seven commitments MGM Bulk made for the FY 24-25, were:

1. Conduct another supply chain assessment of our current critical suppliers to assess the risk of modern slavery practices.
 - ✓ Critical suppliers completed the Modern Slavery questionnaire that we communicated to them for the reporting period.
 - ✓ Critical suppliers who responded in full, provided reliable evidence of their internal commitments to combat Modern Slavery of their compliance.
2. Focus on improving and streamlining our supplier questionnaire process.
 - ✓ The annual questionnaire process was improved by digitising the process, assisting with more sophisticated data analysis and reporting.
3. Review our Modern Slavery risk assessment.
4. Expand the Modern Slavery training to include all MGM staff during their onboarding.
 - ✓ MGM have expanded their internal Modern Slavery training package, designed to increase awareness on modern slavery, to all of MGM Bulk's staff.
5. Formalise a Modern Slavery Committee with Senior Leadership representation.
 - ✓ The Modern Slavery Committee has been formalised and requirements are documented within the MGM Bulk Compliance Management Plan.
6. Develop and communicate a Supplier Code of Conduct, outlining MGM's expectations from our Suppliers and how we must work together to improve human rights related practices.
 - ✓ The Supplier Code of Conduct was developed and communicated to all MGM Bulk's Suppliers.
7. Further breakdown our suppliers into tiered groups based on value of spend with the supplier.

This was investigated and upon evaluation of the value of spend of Suppliers, it was identified that the highest spends were already identified as Critical Suppliers. Instead, MGM Bulk developed and distributed our Supplier Code of Conduct to communicate MGM Bulk's expectations of Suppliers for this financial year. MGM Bulk will consider alternative methods to expand Modern Slavery Reviews for additional suppliers in coming years.

➤ EFFECTIVENESS OF REPORTED ACTIONS

Section 5 . 1 . 1

During this reporting period, MGM Bulk met our commitments and determined that the actions have been effective, as outlined within section 5.1.

➤ PLANS FOR FINANCIAL YEAR 2025 – 2026

Section 5 . 2

Over the next reporting period, MGM Bulk will continue to meet our obligations to eliminate the risk of modern slavery within our operations and supply chain network. We have proposed to undertake the following steps over the next 12 months:

- Conduct another supply chain assessment of our current tier one suppliers to assess the risk of modern slavery practices.
- Review our Modern Slavery risk assessment.
- Continue to provide Modern Slavery training to all MGM staff.
- Communicate the Supplier Code of Conduct, outlining MGM's expectations from our Suppliers and how we must work together to improve human rights-related practices.
- Investigate methods to further break down our suppliers into tiered groups to increase supplier participation with the Modern Slavery questionnaire.

➤ CONSULTATION AND APPROVAL

Section 6 . 0

This modern slavery statement was prepared following a consultation process with the MGM Executive Team, HSEC management and procurement personnel responsible for modern slavery compliance.

This modern slavery statement is approved by the principal governing body of the reporting entity, being the Board of Directors of MGM Bulk Pty Ltd on 21 November 2025.



Signed by Giudi Giacci, a responsible member of the reporting entity, in her capacity as Director of MGM Bulk Pty Ltd



Signed by Michael Giacci, a responsible member of the reporting entity, in his capacity as Director of MGM Bulk Pty Ltd



MGMBULK IS PROUD TO PRESENT OUR MODERN SLAVERY STATEMENT FROM FINANCIAL YEAR 2024 TO FINANCIAL YEAR 2025

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