



MODERN SLAVERY STATEMENT

Redpath (Australia) Holdings Pty Ltd

ACN 133 126 682

Reporting year ended 31 December 2025

Issued: 30 June 2026

Safety – First, Last and Always.

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1.0 ABOUT REDPATH

1.1 Our Business

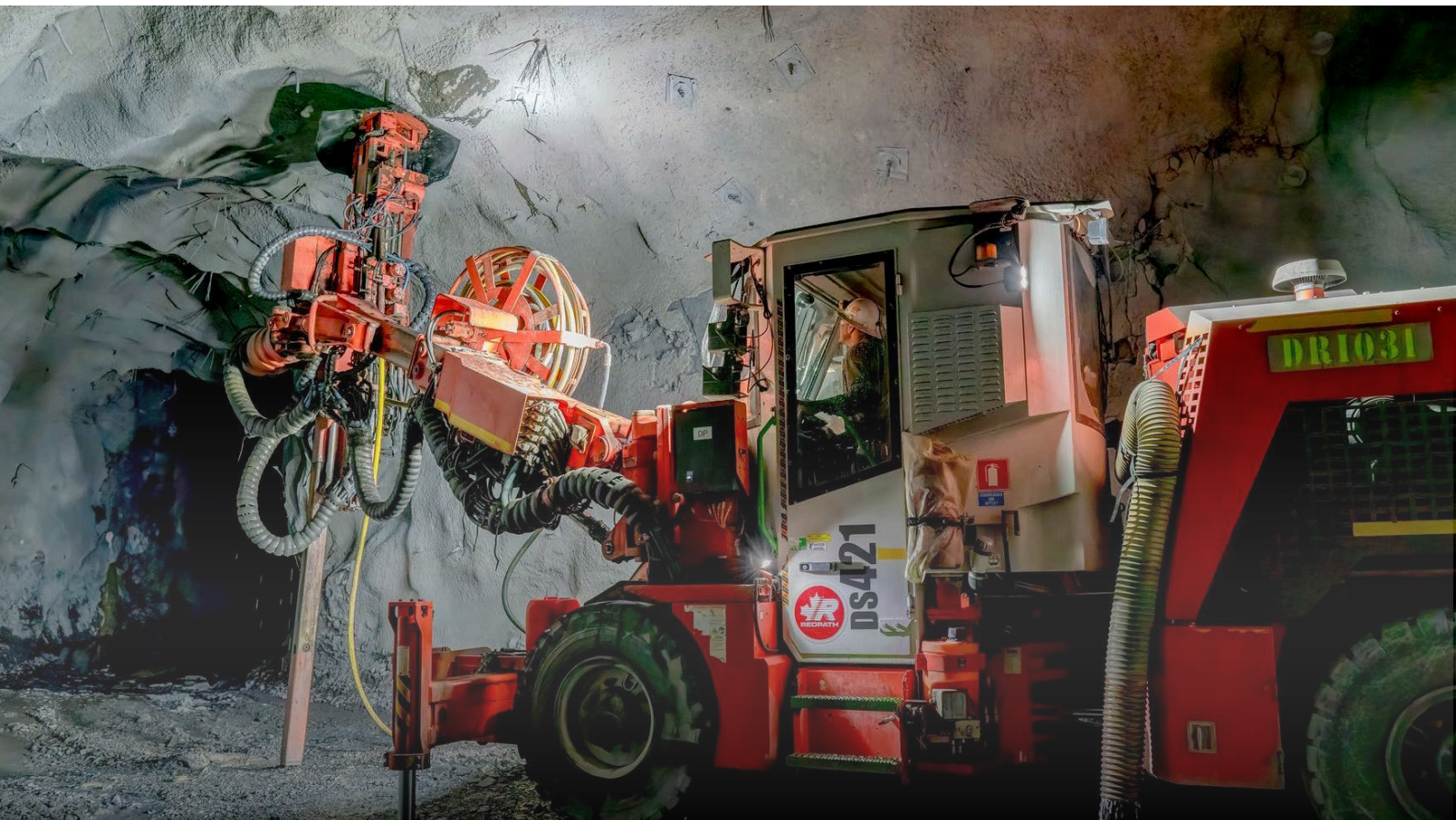
The Redpath Group has been in the mining services business since 1962, originally focused on the Canadian mining industry. The Group takes its name from its founder Jim Redpath, and the business still operates using the Philosophy and Guidelines for Success established by Jim as the business developed.

Today, The Redpath Group is managed from Redpath's head office in North Bay, Ontario, Canada and is owned by Aton 2 GmbH in Germany.

Over time, the Redpath Group has grown and expanded to service its contract mining clients around the world and today is involved in underground mine development, contract mining, tunnelling, shaft sinking, raiseboring, mechanised raising and underground installations. Currently, the Redpath Group has permanent offices in Australia, Canada, Chile, Germany, Indonesia, Kazakhstan, Mongolia, South Africa, and the United States of America and operates projects in many other parts of the world including significant projects in Indonesia and Mongolia.

Redpath (Australia) Holdings Pty Limited and its subsidiaries ("**Redpath**") are part of the Redpath Group and provide mining and engineering services to clients throughout Australia and overseas.

Our approach to doing business with our clients, combined with our capabilities in underground mining and raiseboring, has established Redpath as a trusted partner on key mining projects over many years.



Redpath recognises that businesses play a vital role in addressing modern slavery, including human trafficking, forced labour, servitude, debt bondage and child exploitation. Respecting the right to be free from modern slavery is embedded in Redpath's Guidelines for Success and requires ongoing, collective commitment across the business.

In 2024 Redpath acquired RUC Mining Contractors Pty Ltd (ACN 051 252 549) ("RUC"), including all of RUC's subsidiary companies. The acquisition of RUC significantly increased supplier volume and procurement spend. During 2024, Redpath reviewed and aligned procurement practices across both businesses to strengthen its approach to assessing and managing modern slavery risks.

This Modern Slavery Statement outlines our actions undertaken in 2025, and those planned, to assess and mitigate modern slavery risks within Redpath's operations and supply chains.

1.2 Philosophy and Guidelines

Our Guidelines for Success make clear to our employees the actions and behaviours expected of them when representing Redpath. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating in Australia and overseas and in managing our supply chains.

OUR PHILOSOPHY The Redpath Group Philosophy makes a commitment to: - provide a level of service to the mining industry which will exceed normally accepted standards; - create a desire in the industry for our continuing services; - provide scope and challenge for our employees; - control growth in order to maintain a high calibre of service to the industry. This philosophy has served Redpath well since 1962, and it will continue to support our belief that, at Redpath, "Challenge is an important part of life."  THE REDPATH GROUP Mining Contractors and Engineers redpathmining.com	GUIDELINES FOR SUCCESS We are honest, fair and responsible. We make accurate schedules and budget forecasts that are managed and met to the best of our abilities without surprise. We work by our principles of "Safety - First, Last And Always." We never criticize our competition. We give and publish well-written technical papers. We do not overcommit. We ask if we don't know the answer. We remember that our goal is to serve our clients well. Excuses are unacceptable. We act in the long-term interest of our company and our clients. We do not take advantage of short-term situations. redpathmining.com
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The following statements from our Guidelines for Success specifically support our approach to eliminating modern slavery:

- We are honest, fair, and responsible.
- We work by our principles of "Safety - first, last and always".
- We act in the long-term interest of our company and our clients.

- We do not take advantage of short-term situations.

Consistent with our Philosophy and Guidelines, Redpath is committed to respecting internationally recognised human rights, including the rights to freedom from forced labour, child labour, discrimination, harassment and abuse. These principles apply across our operations and supply chains and underpin our approach to identifying and addressing modern slavery risks.

2.0 REPORTING ENTITIES & SUBSIDIARIES

2.1 Reporting entities & consultation

This is a joint Statement made by Redpath (Australia) Holdings Pty Ltd ACN 133 126 682 for the period 1 January 2025 to 31 December 2025 (“**2025**”) on behalf of itself and the following wholly owned entities (together, “**Reporting Entities**”):

- UnderAus Group Holdings Pty Limited (ACN 117 850 576)
- Eroc Holdings Pty Limited (ACN 097 085 973)
- Redpath Australia Pty Limited (ACN 067 084 708)
- Redpath Contract Services Pty Limited (ACN 133 126 904)
- Redpath Australia Coal Pty Limited (ACN 169 251 129)
- RUC Mining Contractors Pty Limited (ACN 051 252 549)
- Incycle Shotcrete Pty Ltd (ACN 112 241 648)

All Reporting Entities operate under common Redpath procurement, modern slavery, governance and compliance policies and procedures, which are overseen by Redpath (Australia) Holdings Pty Ltd ACN 133 126 682. In accordance with section 16(1)(f) of the *Modern Slavery Act 2018* (Cth) (“**Act**”), Redpath (Australia) Holdings Pty Ltd has fully consulted with all Reporting Entities in order to prepare this Statement.

2.2 Non-reporting entities

The following entities are not “reporting entities” for the purposes of the Act, however are subsidiaries of the Reporting Entities. Throughout 2025 Redpath progressed implementation of its modern slavery assessment protocol across these entities and anticipates material alignment by the end of 2026:

- Redpath PNG Limited (Papua New Guinea)
- PT Redpath Mining Services Indonesia (Indonesia)
- Clough Projects Singapore PTE. LTD (Singapore)
- RUCCEM LLC (Mongolia)
- Turan Industrial LLP (Kazakhstan)
- KP Industrial LLP (Kazakhstan)
- Murray & Roberts CIS LLP (Kazakhstan)

Redpath is owned by Redpath Mining Inc. (Canada) which is owned by ATON 2 GMBH. ATON was founded 2001 in Fulda, Germany. The ATON Global Group operates in four business segments: Engineering, Mining Technology, Medical Technology and Aviation. These parent companies are not subject to the Act but do undertake reporting as required by their respective jurisdictions.

3.0 REDPATH SUPPLY CHAINS

Redpath’s supply chain includes the procurement of goods and services.

In 2025 Redpath had over 1,600 active suppliers with a total spend exceeding \$300 million dollars

(AUD). Most of our suppliers for Australian operations are in Australia, with a relatively small number of offshore suppliers. Our major supply chains include the following services and products:

- Equipment and spares
- Consumables
- Oils and lubricants
- Site utilities and infrastructure
- Freight and transport
- Explosives
- Travel & Accommodation

Redpath recognises that its suppliers may source products from outside Australia, which has the potential to present an increased risk of modern slavery. During 2025, Redpath further progressed its understanding of modern slavery risks within its supply chain through the use of third-party risk assessment tools to improve risk identification and prioritisation.

4.0 MODERN SLAVERY RISKS

Building on the work undertaken in prior reporting periods, Redpath has progressively enhanced its visibility of supply chain risk. The outcomes of the 2025 supplier risk assessment process have informed Redpath's identification of higher inherent risks areas, including in higher-risk geographies and sectors.

Modern slavery risks identified for Redpath Australia include:

RISK CATEGORY	RISK DESCRIPTION
Supply chain management risks	• Supplier does not have a policy or process that prohibits modern slavery in its operations and in those of its suppliers, particularly for offshore subsidiaries. • Supplier does not have policies and processes to identify, investigate and remedy risk and instances of modern slavery, particularly for offshore subsidiaries. • Supplier cannot demonstrate employee training to manage modern slavery risk. • Supplier does not conduct due diligence for modern slavery risks on its suppliers. • Supplier does not require its own suppliers to conduct due diligence for modern slavery on their suppliers. • Supplier does not provide accessible and effective grievance mechanisms, or discourages workers from raising complaints.
Supply Chain labour risks	• Supplier engages labour hire workers or subcontracted personnel who are subject to unlawful recruitment fees, wage deductions/withholding or retention of identity documents, creating conditions consistent with debt bondage. • Supplier does not undertake checks to ensure child labour is not being used within its organisation or suppliers. • Supplier cannot demonstrate compliance to with minimum wage, overtime, or penalty rate obligations under applicable laws or industrial instruments. • Supplier engages workers as independent contractors in circumstances

RISK CATEGORY	RISK DESCRIPTION
	where they may be misclassified, resulting in reduced employment protections. - Workers are subject to excessive working hours without appropriate rest periods or compensation. - Supplier does not have a mechanism to anonymously raise issues related to labour conditions or workplace grievances.
Supply chain goods risk	- Supplier has a facility (or facilities) in locations identified as high risk. - Supplier provides goods/materials or services identified as high risk.

5.0 CONTROLS, ASSESSMENT & REMEDIATION

5.1 Controls

Redpath has implemented the following control and assurance measures to mitigate the risk of modern slavery within its supply chain.

CONTROL CATEGORY	ONGOING CONTROLS IN PLACE	ASSESSMENT EFFECTIVENESS
Governance	Key Policies that address human rights and modern slavery for Redpath (excluding RUC and subsidiaries): - Code of Conduct - Modern Slavery Policy - Diversity and Inclusion Policy - Grievance Policy	Internal audits and compliance reporting monitor completion rates for mandatory training, with results reviewed periodically to identify gaps in coverage and effectiveness.
Supply Chain goods & labour	- Conduct due diligence in all new supplier requests in Australia. Implementation across offshore subsidiaries is expected to be completed during 2026. - Continue to ensure suppliers of goods and services to Redpath comply with the Act and Redpath's related policies. - During 2025 Redpath implemented the structured supplier risk screening process, as discussed further in section 5.3.	Periodic review of supplier due diligence outcomes, including screening results and questionnaire responses, to identify higher risk suppliers and assess whether controls are appropriately targeted and effective.
Reporting	Whistle blower policy and anonymous reporting process whereby an employee or contractor may report any instances of suspected modern slavery in the workplace and/or supply chain. A report using this service will be investigated confidentially in accordance with Redpath's whistle blower policy.	Reported matters are tracked and reviewed to ensure timely investigation and appropriate resolution, with outcomes informing improvements to Redpath's control framework where require.

5.2 Control assessment – high-level results

During 2025:

- No suppliers were onboarded by Australian entities unless they satisfactorily responded to all modern slavery due diligence enquiries concerning modern slavery.
- Screening of top 1,500 suppliers (by spend) identified:
 - 1 supplier assessed as potential moderate-high risk; and
 - 12 suppliers assessed as potential moderate risk.

These results are discussed further in Section 5.3.

- There were no modern slavery incidents being recorded via reporting channels.

5.3 Screening of suppliers

During 2025, Redpath implemented a structured supplier risk screening process using proprietary third-party assessment software. Importantly, these assessments do not represent confirmed instances of modern slavery risk; rather, they apply recognised data sets to assess country, sector and supplier-level risk indicators.

This tool was used to assess Redpath's top 1,500 suppliers (by spend) throughout 2025. The table below provides a high-level, anonymised snapshot of the 12 suppliers assessed as "Moderate" and one supplier assessed as "Moderate-High" inherent modern slavery risk, grouped by sector and indicative spend profile. There were no suppliers assessed as "High".

Sector / Category	Country & Industry Risk Rating	Annual Spend Range (AUD)	No. of Suppliers
Professional Services (Business Services)	Moderate-High	Very Low (<\$50k)	1
Professional Services (Business Services)	Moderate	Very Low (<\$50k)	1
Freight & Logistics (Land Transport)	Moderate	Very Low (<\$50k)	1
Textiles / Fabricated Soft Goods	Moderate	Very Low (<\$50k)	5
Industrial Manufacturing & Equipment Supply	Moderate	Very Low-Low (<\$50k–\$100k)	3
Industrial Manufacturing & Equipment Supply	Moderate	Moderate (\$300k–\$500k)	1
Industrial Manufacturing & Equipment Supply	Moderate	High (\$500k–\$1m)	1

Spend profile ("Very Low" etc) is based on Redpath's relative supplier spend distribution for 2025.

The results of "Moderate" or above will be used to prioritise further review and engagement with relevant suppliers in 2026.

Redpath considers this screening process to be a further step in developing its risk-based approach to managing modern slavery risks across its supply chain.

5.4 Remediation

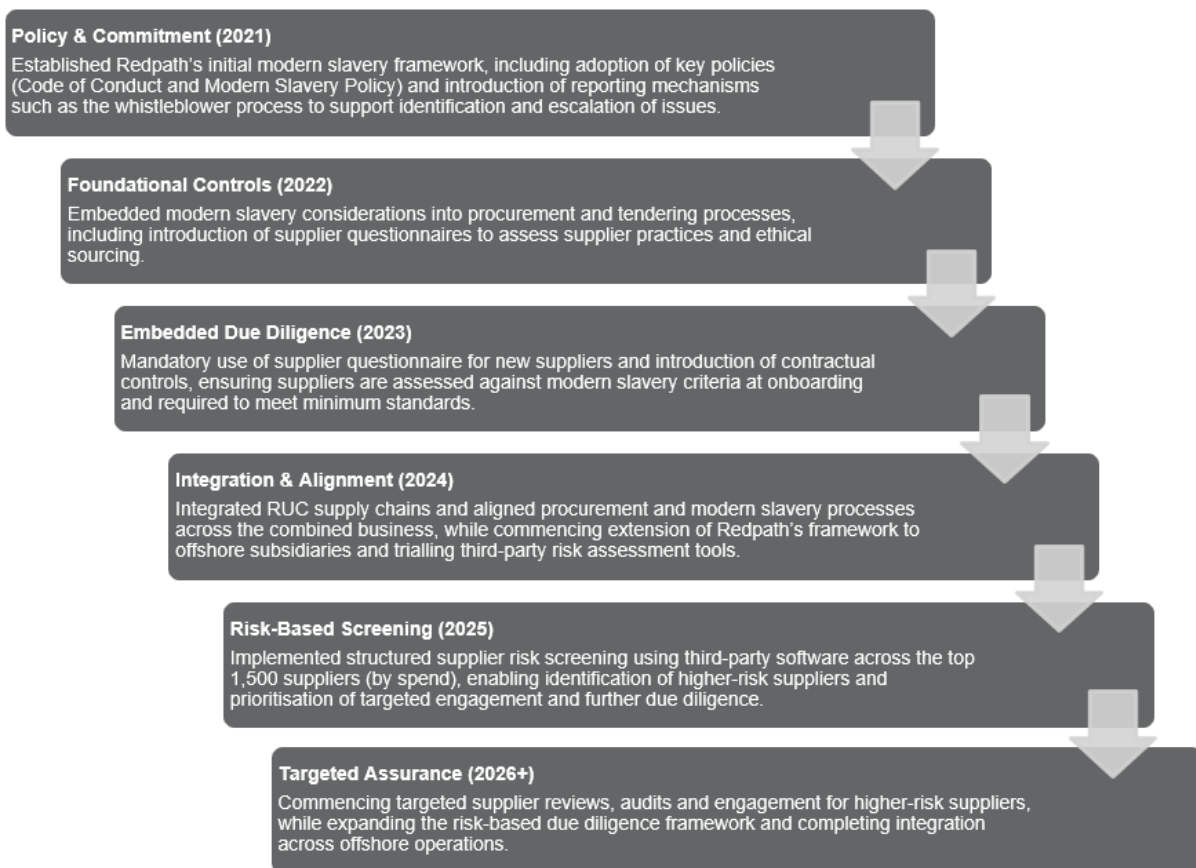
Where potential or actual modern slavery risks are identified, Redpath engages with the relevant supplier to develop and implement corrective action plans and, where necessary, may suspend or terminate the relationship. This process will be formalised in 2026 as part of a broader refresh of Redpath's global compliance program.

6.0 PROGRESS & LOOKING AHEAD

6.1 Year-on-year progression

Redpath continues to enhance its approach to identifying and managing modern slavery risks, recognising the need for ongoing development of systems, data and supplier engagement.

A summary of its actions in recent years and looking forward is below.



6.2 Looking ahead

Redpath will continue to develop and implement frameworks to assess and monitor modern slavery risks in its operations and supply chain. These risks are complex and evolving, and Redpath will continue to engage with stakeholders to assess the effectiveness of its approach and identify opportunities for improvement.

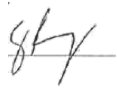
Building on the 2025 supplier risk screening process, in 2026 Redpath will:

1. undertake targeted supplier risk reviews and assurance activities (including, where appropriate, audits and supplier engagement) of those suppliers identified as High and Moderate to High risk, to better understand specific risks and the adequacy of existing controls;
2. continue to progress integration of Redpath's modern slavery policies and procedures across its offshore subsidiaries; and
3. formalise global sanctions protocols for compliance breaches, including those relating to modern slavery violations.



7.0 APPROVAL BY BOARD

This statement was approved by the board of Redpath (Australia) Holdings Pty Limited on 29 June 2026 on behalf of itself and as the parent entity for all other Reporting Entities listed in in Section 2.1.



Gavin Ramage

Managing Director

Redpath (Australia) Holdings Pty Ltd

29 June 2026