

1. Introduction

This Modern Slavery Statement is made in accordance with the Commonwealth Modern Slavery Act 2018 (Cth) for the reporting period ending financial year 2023 / 2024. At Comiskey Mining Services Pty Ltd, we are committed to ethical practices, transparency, and upholding the rights of all individuals in our operations and supply chain. We recognize the importance of taking action to mitigate the risks of modern slavery and are dedicated to conducting business responsibly.

2. Structure, Operations, and Supply Chain

Comiskey Mining Services (CMS) is an innovative Earthmoving Equipment Rental business supplying the resources sector. CMS specialise in wet or dry equipment hire and tailor maintenance packages to suit customer requirements. We operate Australia wide with office locations in Brisbane, Mackay, Hunter Valley and Perth. We source products, materials, and services from suppliers across Australia and the US, and we understand that our global supply chain may include areas of potential modern slavery risk.

3. Risks of Modern Slavery Practices in Operations and Supply Chain

We acknowledge that modern slavery risks can exist in various areas of our operations and supply chain. CMS only provide services within Australia and as such all our employees are Australian based. Our supply chain encompasses a wide range of products and services, sourced from suppliers of varying sizes, including large corporations as well as small and medium-sized local businesses. Many of these supplier partnerships are long-standing and firmly established.

Our supply chain is constituted by:

Direct suppliers of the following general categories of products and services:

- goods and services – for example, fuel, oils, lubricants, spare parts, tyres, uniforms, cleaning services, transport, utilities (including telecommunications services) and information technology systems and services,
- maintenance services – Diesel fitters, auto electrical and boiler maker
- capital purchases – for example, purchase of assets (such as trucks, dozers and other plant & equipment & light vehicles)
- professional services – for example, advisory services for financial, legal and other technical matters in support of projects such as legal matters, advisory and audit services

for which CMS has a direct contractual relationship (whether formal or informal).

3.1 Operational Risk

CMS operates exclusively in Australia, with all employees based locally. Due to Australia's robust regulatory framework and societal expectations regarding employment conditions, the risk of CMS causing, contributing to, or being directly linked to modern slavery practices within its operations is minimal.

We maintain strong oversight of our workforce and fully comply with Australian workplace laws, including the Fair Work Act 2009 (Cth), National Employment Standards (NES), mining regulations, and work health and safety legislation. This ensures confidence that no modern slavery practices exist within the operations directly under our control.

Additionally, CMS consults external legal experts specialising in employment law, along with other service providers, to ensure compliance with our legal and social responsibilities and to guarantee that our employees receive their rightful entitlements. We are confident that our workforce is not directly affected by or contributing to modern slavery practices.

3.2 Supply Chain Risks

CMS acknowledges that while most suppliers are based in Australia, some products and services are partially or wholly made in other regions worldwide. Our multi-tier supply chain includes higher-risk areas for modern slavery. Although we can monitor our direct suppliers, we have limited control over their suppliers' practices.

4. Actions Taken to Address Modern Slavery Risks

We are committed to addressing and mitigating modern slavery risks within our operations and supply chain. As this is our first reporting period CMS will be actioning the following items:

- Update and distribution of our Modern Slavery Policy, including adding it to our website.
- General Hire Agreement to include details and information regarding Modern Slavery.
- Update our Subcontractor agreement that requires our subcontractors & suppliers to adhere to ethical labour standards and prohibits modern slavery practices.

Audits are carried out as part of CMS's assurance activities, guided by risk assessments and adherence to various standards across information security, quality, health and safety, and environmental management. Both internal and external compliance audits are conducted to maintain ISO 9001, 14001, and 45001 certifications, which include evaluations of supplier management practices. Additionally, external audits are performed for statutory financial reporting and certification purposes.

4.1 Training and Awareness

We will provide training to our employees and management to recognise and respond to modern slavery risks.

4.2 Grievance Mechanisms

CMS has a whistleblower policy and other policies and procedures in place as part of its ISO accreditation to report unsafe business practices and protect those who report them.

5. Measuring Effectiveness of Our Actions

To ensure the effectiveness of our actions, we monitor and review the following:

- Supplier compliance and audit results
- Reports received via grievance mechanisms
- Progress in training programs
- Results from ongoing risk assessments and the remediation of identified issues

We are committed to continuous improvement and will continue to develop our practices and policies to better address modern slavery risks.

6. Consultation and Stakeholder Engagement

CMS don't own or control any other entities, but we engage in ongoing dialogue with internal and external stakeholders, including suppliers and industry bodies, to share best practices and improve our approach to modern slavery risk management.

7. Approval and Signature

This statement is approved by the Directors of Comiskey Mining Services on the 7th of February 2025.



Brett Comiskey
Managing Director
Comiskey Mining Services Pty Ltd
Date:

07 / 02 / 2025



Brendan Camilleri
Director
Comiskey Mining Services Pty Ltd
Date:

07 / 02 / 2025