



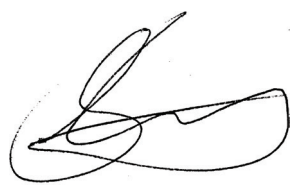
MODERN SLAVERY STATEMENT

2023



This Modern Slavery Statement has been endorsed by the JENMAR Australia board of directors and approved 20 March 2023.

Gareth King
Managing Director



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“ Respecting human rights is an essential obligation of our business including actively ensuring that there is no modern slavery throughout our business activities. ”

Modern Slavery Policy



Respecting human rights is an essential obligation of our business including actively ensuring that there is no modern slavery throughout our business activities. The management of JENNMAR Australia remains committed to the ongoing assessment of our risk profile and immediate action to address any identified areas of concern.

JENNMAR's Australian manufacturing operations personnel are employed under Commonwealth guidelines dictating conditions and remuneration. Our employee induction process requires that all personnel acknowledge and confirm their understanding of our human rights commitments including our Modern Slavery Policy.

During the last 12 months we have completed a detailed review of our internal performance which resulted in several policy upgrades including our "Behaviour and Culture" and "Code of Conduct" policies.

A complete review of our supply chain risk assessment has been completed for 2023 with our domestic supply chain once again assessed as insignificant risk. Despite this we continue the observation of our domestic supply chain in relation to human rights obligations.

Despite the controls that we have in place, our overseas supply chain presents a different element of risk due primarily to geographical diversity. The opportunity to recommence overseas supplier evaluations will be re-examined during 2023, assessing the feasibility of safely resuming visitations to overseas supplier facilities.

The additional resources that were implemented 12 months ago have proven to be extremely valuable in the communication and assessment of our overseas providers. Once again we have overachieved on our annual overseas supplier assessment commitment with almost 50% of all suppliers being assessed during the year.

During the next 12 months additional supply sources will be evaluated from both Asia and Europe with all potential suppliers being assessed in accordance with our policies. Additional resources have already been added to the business which will help ensure that our attention to compliance in all areas remains high.



Introduction

JENNMAR is a leading global manufacturer and supplier of high quality ground support technology for underground mining and tunnelling. Our major Australian manufacturing facilities are located at Sydney, Mackay and Perth. JENNMAR also operates warehouse and distribution centres in the key mining regions of Broken Hill, Mount Isa and Hunter Valley.

JENNMAR Australia has a recognised history of industry leading service support and new technology development. JENNMAR is credited with the introduction of new technology that has delivered significant and sustainable commercial, operational and safety benefits to our Australian customers.

JENNMAR's world class research and development centre is operated at separate premises in Smeaton Grange in South Western Sydney, where designated research personnel focus on important industry collaboration projects with Australian research organisations and universities.

JENNMAR Australia employs approximately 250 people across our manufacturing, distribution, sales and administration functions. Our manufacturing operations utilise Australian produced steel with a large percentage of our high quality products sold to Australian domestic customers with some export sales.

The primary products manufactured include steel torque tension bolts, friction bolts, cable bolts and steel bearing plates plus a complete range of ancillary products and components. Other specially designed support products including steel mesh and cement grouts are manufactured to strict JENNMAR specifications and quality guidelines by third party Australian providers.



Organisational Structure



JENNMAR Australia Pty Ltd. is a wholly owned business of Frank Calandra Inc. (FCI) headquartered in Pittsburgh USA. The JENNMAR Australia Managing Director reports directly to the President of FCI.

JENNMAR Australia's head office is located at our manufacturing facility in Smeaton Grange NSW.

JENNMAR Australia Pty Ltd. does not have any subsidiaries. The following are related corporations of JENNMAR Australia Pty Ltd:

FCI Holdings Australia Pty Ltd

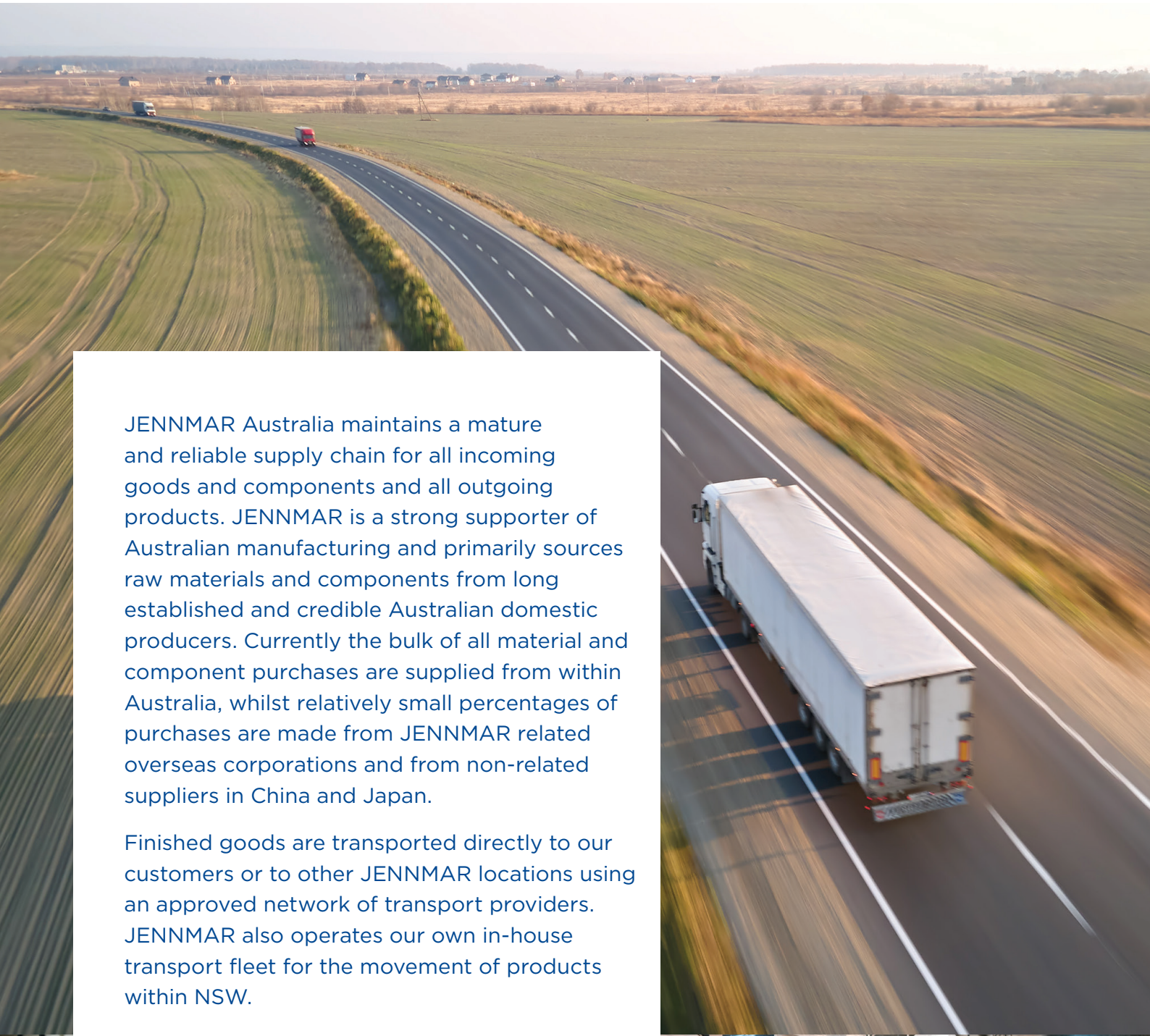
FCI Properties Australia Pty Ltd

JENNCHEM Australia Pty Ltd

All relevant personnel have been made aware of and provide equal commitment to our obligations in relation to human rights and modern slavery. The supply chain for both organisations is managed within each business but is overseen by senior personnel from JENNMAR Australia.



Our Supply Chain



JENNMAR Australia maintains a mature and reliable supply chain for all incoming goods and components and all outgoing products. JENNMAR is a strong supporter of Australian manufacturing and primarily sources raw materials and components from long established and credible Australian domestic producers. Currently the bulk of all material and component purchases are supplied from within Australia, whilst relatively small percentages of purchases are made from JENNMAR related overseas corporations and from non-related suppliers in China and Japan.

Finished goods are transported directly to our customers or to other JENNMAR locations using an approved network of transport providers. JENNMAR also operates our own in-house transport fleet for the movement of products within NSW.



We remain diligent in the assessment of human rights and modern slavery risks throughout our total business activities. A thorough review of our Modern Slavery risk assessment has been completed including all aspects of our material and component supply chain. The outcome of the risk assessment process confirmed that the risk of Modern Slavery within our organisation and supply chain is low.

This includes the assessment of all supply chain elements including:

Domestic Suppliers: have been reviewed and will continue to be categorised as insignificant risk due to the fact that they operate under commonwealth guidelines and Australian government legislation, plus their operations are readily accessible for assessment by JENNMAR personnel.

Related international Suppliers: have been categorised as insignificant risk due to the fact that JENNMAR has direct control over the employment conditions of its personnel.

International Suppliers – China: have been categorised as moderate risk for JENNMAR owing to the geographical difficulty in accessing their operations. This risk is being further controlled with the dedicated in-house resources now in place to manage our supply from this region.

International Suppliers – Japan: have been categorised as insignificant risk owing to the fact that it consists of large multi-national suppliers and their operations have been previously visited and reviewed on multiple occasions by JENNMAR representatives.



Actions

Our procurement process includes undertaking due diligence and evaluation of proposed supplier quality management systems. An outcome of our initial Modern Slavery risk assessment was the expansion of this process to include the evaluation of modern slavery practices.

With a total base of more than 300 suppliers, we place a high emphasis on quality, security of supply and sustainability and have long term business relationships with many of our suppliers both domestic and international.

Following the easing of COVID-19 related overseas travel and visitation restrictions implemented since early 2020, the potential to visit overseas suppliers will be risk assessed during 2023. If all of the necessary safety controls are deemed to be in place, it is hoped that our traditional form of face to face visits and evaluations may resume.

Following the completion of our detailed risk assessment review, our total supplier base continues to be categorised into two separate groups:

1. Suppliers where a Modern Slavery Assessment was deemed necessary.
2. Suppliers where a Modern Slavery Assessment was **not** deemed necessary.

The key action for JENNMAR remains to be our commitment to the annual assessment of 25% of our supplier base where a Modern Slavery Assessment is deemed necessary. This will continue to include the assessment of current suppliers and the evaluation of all new suppliers.

Where a face to face assessment of an international supplier is not possible, assessments will be undertaken by experienced JENNMAR Australia personnel or by a JENNMAR approved credible third party provider.

“ With a total base of more than 300 suppliers, we place a high emphasis on quality, security of supply and sustainability... ”

Any suppliers found to have areas of potential concern within their business will be provided the opportunity to respond to the concerns. If the response is unsatisfactory and an acceptable way forward cannot be agreed between both parties, JENNMAR will look to source materials from alternative approved suppliers.



Our commitment to supply chain reviews for 2022/2023 has now been completed with 100% of our assessed suppliers cooperatively participating in the self-assessment process. No instances or suspicions of modern slavery practices have been identified from any of our targeted annual assessments for 2022/2023.

The effectiveness of JENNMAR's actions to identify and eliminate potential incidences of modern slavery practices from our total supply chain will continue to be reviewed as part of our annual statement preparation and submission process.

The commitment required from our suppliers will be measured as a combination of their formal responses to our reviews, as well as their willingness to both participate in the reviews and their response to any identified areas of concern within their businesses.

JENNMAR's commitment to the process will be demonstrated by our actions in the event that any potential instances of Modern Slavery are identified in our supply chain as a result of our reviews. Our annual overseas supplier assessment target will remain as a minimum of 25% as part of our ongoing commitment to reviewing our supply chain risks.

The results of our efforts will form part of our annual statement submissions and any necessary refining of our review processes.



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An aerial photograph of an industrial facility with several large white-roofed buildings and parking areas. A large, stylized logo consisting of a white semi-circle with a black arc above it is overlaid on the right side of the image. The word "JENNMAR" is written in bold, dark blue capital letters across the bottom of the semi-circle.

JENNMAR