



ONE KEY GROUP
MODERN SLAVERY STATEMENT

REPORTING YEAR ENDED
31 AUGUST 2020



1. REPORTING ENTITIES

Pursuant to the Modern Slavery Act 2018 (the Act), this modern slavery statement is put together on behalf of One Key Holdings Pty Ltd ACN 150 149 643 (OKH) and its subsidiaries and associated entities which are reporting entities under the Act, as set out below:

- *One Key Resources Pty Ltd ACN 141 650 259*
- *FES Coal Pty Ltd ACN 626 773 911*
- *OKR Technical Services (Australia) Pty Ltd ACN 612 348 222*

(together the One Key Group).

This is a joint statement by each of the reporting entities under the Act, and the first modern slavery statement of the One Key Group under the Act.

This modern slavery statement is prepared in accordance with the Act and describes the risks of modern slavery in the One Key Group, the steps we have taken in the financial year ending 31 August 2020 to identify, manage and mitigate the risks in our operations and supply chains and considers the effectiveness of actions to manage this risk.

The One Key Group is committed to actively tackling the risk of modern slavery throughout our supply chain. We hold integrity as a central, core value of the One Key business and we strive to act ethically and transparently throughout all our business dealings.

References to One Key Group, 'we', 'us' and 'our' collectively refers to One Key Group and each of its reporting entities covered by the statement.



2. STRUCTURE, OPERATIONS AND SUPPLY CHAINS

STRUCTURE

OKH is an Australian proprietary company that was established in 2011 and is headquartered in Brisbane, Queensland. The registered head office of the One Key Group is Level 15, 324 Queen Street, Brisbane, 4000, QLD. The One Key Group trades under the name One Key Resources.

OKH is wholly owned by OKR Technical Services (Australia) Pty Ltd, which is in turn wholly owned by OKR Technical Services UK Limited, which is ultimately owned by Fircroft Engineering Services Holdings Limited (FESHL). FESHL is the ultimate parent company of the One Key Group and is a UK based private limited company.

As of the date of this statement, the One Key Group current has 43 internal employees.

OPERATIONS

The One Key Group is an Australian labour hire provider, supplying labour hire services and workforce solutions to the black coal, iron ore and gold mining industries within Australia. We specialise in supplying and managing large scale workforces whilst maintaining a firm focus on productivity and performance.

As of the date of this statement, One Key currently has 817 labour hire employees across Australia. Labour hire employees are employed by a number of entities across the One Key Group depending on factors including the location of the mine site where the employee is based and the specific type of mining the employee is involved in. The employee's employment may be governed by an industrial award or enterprise bargaining agreement, dependant on a variety of factors such as job role and location.

SUPPLY CHAINS

Given that the One Key Group is a labour hire provider, we have a limited number of direct suppliers.

One Key Group's supply chains include the procurement of the following goods:

- Personal protective equipment

- IT equipment
- Promotional materials such as branded pens and bags
- Office stationery
- Office refreshments such as milk, tea and coffee
- Vehicles for internal staff use
- Software

In addition to goods, the One Key Group's direct supply chains include the procurement of the following services:

- Banking services from Australian banks
- Accounting and legal services from professional services firms
- IT support services
- Medical providers
- Training providers
- Travel providers
- Cleaning services

3. MODERN SLAVERY RISKS IN OPERATIONS AND SUPPLY CHAINS

The One Key Group is a labour hire services provider based solely in Australia and as such has a limited direct supply chain. We have reviewed our current suppliers in consideration of the modern slavery risks they may present, and we consider the following to be potential risk areas.

PROCUREMENT OF GOODS:

- Personal protective equipment which is manufactured overseas
- IT equipment
- Promotional materials such as branded pens and bags
- Office stationery

The goods listed above would normally be sourced from local Australian companies; however, the goods may have been manufactured in countries listed in the Global Slavery Index. The risk varies depending on the country and the product type.

PROCUREMENT OF SERVICES:

- Cleaning services
- Overseas IT services

As a sector, cleaning is considered high-risk for modern slavery and exploitation due to the complexity of the industry and the nature of the workforce. There is a risk that overseas IT services may be provided by companies who engage employees located in countries listed in the Global Slavery Index.

4. THE ONE KEY GROUP'S ACTIONS

POLICIES AND PROCEDURES

The One Key Group monitored modern slavery risks within its direct supply chain and operations, during the prior relevant reporting period via adherence to the overarching policies of the previous corporate group One Key was formally a part of. The One Key Group was previously a part of the international Fircroft group ("Fircroft Group"), which is a global technical manpower provider to the oil, gas and mining industries. One Key Group was a specialised mining division within the Fircroft Group until September 2020 when One Key became independent from the Fircroft Group.

One Key followed the Fircroft Group's Global Modern Slavery, Code of Conduct and Anti Bribery and Corruption policies. A global Modern Slavery Statement was published on the Fircroft Group's website communicating the steps taken by the business to combat modern slavery.

One Key also adopted the Fircroft Group's Australian Whistleblowing Policy. A whistleblowing reporting portal was put in place to enable reports to be made for issues including but not limited to compliance obligations, corporate governance and any complaint regarding modern slavery obligations. The



Whistleblowing Policy is currently under review given the One Key Group is now independent from the Fircroft Group. Further, One Key is in the process of setting up an independent whistleblowing service.

STRENGTHENING CONTRACTUAL OBLIGATIONS WITH SUPPLIERS

During the reporting period (and in the period from the end of the reporting period to the date of this statement) One Key has:

- (i) Updated its standard terms of business and subcontracting terms and conditions to include an obligation on its customers and clients to comply with the Act. Specifically, customers and clients are required to:
 - have in place adequate procedures and policies to prevent and address involvement in modern slavery in accordance with the Act and in line with recognised international standards including the UN Guiding Principles on Business and Human Rights; and
 - report to One Key Group if a customer or client becomes convicted of any offence concerning modern slavery, or is subject to an investigation, enquiry or enforcement proceedings in connection with modern slavery.
- (ii) Updated its internal commercial risk standards to include a reference to modern slavery, in an effort to ensure each new contractual arrangement entered into by One Key contains undertakings by its clients to comply with the Act.

FUTURE INTENTIONS

One Key intends to take the following actions moving forward:

- Any new clients or suppliers who have links to a higher risk industry or a country with a high-ranking modern slavery prevalence will be required to complete a supplier questionnaire, designed to give One Key the opportunity to assess their supply chain and potential modern slavery risks before agreeing to purchase goods or supply services.
- One Key is committed to reviewing the modern slavery statements of its key clients, once lodged, to maintain an overview of the modern slavery practices which are ongoing in One Key's wider supply chain.

- One Key intends to roll out staff training to raise awareness of modern slavery risks in every day business dealings, and to ensure staff are informed to enable staff to recognise and raise concerns when necessary.
- One Key further intends to conduct an in-depth review of all current suppliers which will include the roll out of a supplier questionnaire. We intend to take a proactive approach with our suppliers and where possible adopt a collaborative approach to mitigate risks to identify modern slavery and anti-corruption risks across our supply chain.

5. EFFECTIVENESS

One Key Group intends to assess the effectiveness of the actions being taken to assess and address modern slavery risks by:

- Establishing an annual senior management review of the One Key Group's response to modern slavery.
- Ensuring the One Key Group's processes and procedures in relation to modern slavery are raised on an annual basis at a meeting of the directors for discussion.
- Routinely reviewing the suitability of our supplier risk assessments to ensure these remain up to date.
- Conducting internal audits of supplier questionnaires to determine if mitigation measures have been consistently actioned.
- Conducting an annual review of our key client's modern slavery statements.

6. CONSULTATION

The following steps have been undertaken to consult with the entities covered by this statement:

- There is commonality of directors across the senior leadership team and the subsidiary companies.
- This statement was reviewed and approved by the senior leadership team.

- The directors of the relevant subsidiary companies have had the opportunity to review this statement and provide feedback.

7. FUTURE OUTLOOK

The One Key Group will continue to monitor and develop its systems and processes with a view to combating modern slavery risks. One Key intends to roll out staff training to raise awareness of the risks of modern slavery across the business in 2021.

This statement was approved by the directors of OKH and by the directors of the relevant other reporting entities covered by this statement on 29 March 2021.

A handwritten signature in black ink, appearing to read "Glenn Triggs". The signature is written in a cursive style with a large, stylized initial 'G'.

Glenn Triggs
Chief Executive Officer
One Key Group
29 March 2021