



Modern Slavery

Statement 2023 - 2024



Table of Contents

General Introduction	01
What We Do	02
Engineering Services	03
NEPEAN Engineering	
ALPINE	
Building Products	06
Building Products & Services	
Mining Systems & Equipment	08
Conveyors	
NEPEAN Longwall	
NEPEAN Power	
Transport Equipment	12
NEPEAN Transport	
Supply Chain	14
Ongoing Assessment	15
Supplier Due Diligence	
Policies	
Ongoing Risk Assessment & Awareness	16
Contracting	
Location Risk	
Modern Slavery in a global regulatory context	18
Assessing the effectiveness of our approach	
Location Risk Map	19
Forward in Review	20
Reporting YR 2024-2025 Planned Further Actions	
Governance	22
Approval Statement	

General Introduction



This 2023 Modern Slavery Statement has been prepared for the reporting period 1 July 2023 to 30 June 2024.

Our approach to Modern Slavery is underpinned by our commitment to revising and enhancing **our approach** to modern slavery practices together with **greater investment** and efforts to prevent and **manage** this risk from occurring.

This 2023 Modern Slavery Statement has been prepared for the reporting period 1 July 2023 to 30 June 2024.

NEPEAN continues to grow in both Australia and overseas with operations operating across 6 continents, we recognise more than ever the potential risk for labour rights violations in our industry and supply chains.

We continue to identify and assess our supply chains, particularly where Modern Slavery presents the greatest risk, and believe deeply that modern slavery violations must continue to be considered unacceptable in all of its forms. By focusing on specific high risk sectors we believe we are setting a strong foundation not only across our areas of operations or supply chains, but for the future.

Miles Fuller
CEO, Chairman & Director

What We Do



NEPEAN is a significant **engineering and industrial manufacturing** organisation.

We are highly trusted by clients, employees and suppliers and have earned an enviable reputation as an industry leader in design, manufacture, service, and support for mining, engineering, transport and building and infrastructure industries.

We employ over 2 000 people in 6 continents and have significant businesses in Australia, USA, Canada, Chile, China, Indonesia, Germany, Finland, Sweden, Austria and Brazil. Our 30+ manufacturing companies are run by empowered expert technical general managers.



+30
manufacturing
companies



+2000
employed
across 6 continents

Engineering Services





NEPEAN Engineering

Our engineering operations provides specialist engineering services to the mining, manufacturing, infrastructure, water, defence, from Narellan NSW.

These specialties include:

- Heavy & Light Metal Fabrication
- Laser Cutting, Profile Cutting, Surface Treatment & Assembly
- Precision Inspection
- Design & Engineering
- Special Machines
- CNC Machining
- CNC Boring
- Surface & Spherical Grinding
- EDM Wire Cutting



ALPINE

ALPINE is an engineering, consulting and equipment supply company in the field of continuous mining and bulk materials handling equipment and systems.

Equipment is supplied across two major customer segments of Bulk terminals and Mines.

Our engineering capability includes:

- Consulting and studies
- Conceptual design
- Structural design
- Mechanical design
- Electrical / control engineering
- Flow (DEM) analysis

Building Products

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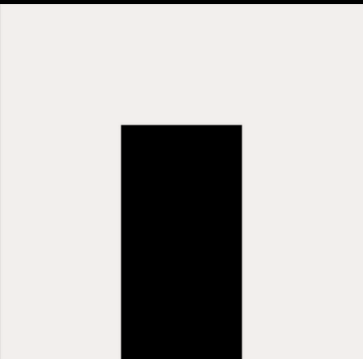
Building Products and Services

Our NEPEAN Building and Infrastructure business includes the manufacturing, supply & galvanising of metal products and services through our entities of Weldlok, Galserv and Galintel for the architectural, civil, construction and industrial markets operating from our Banyo, Coffs Harbour, Mackay, Melbourne, Perth, Tasmania and Yagoona locations.

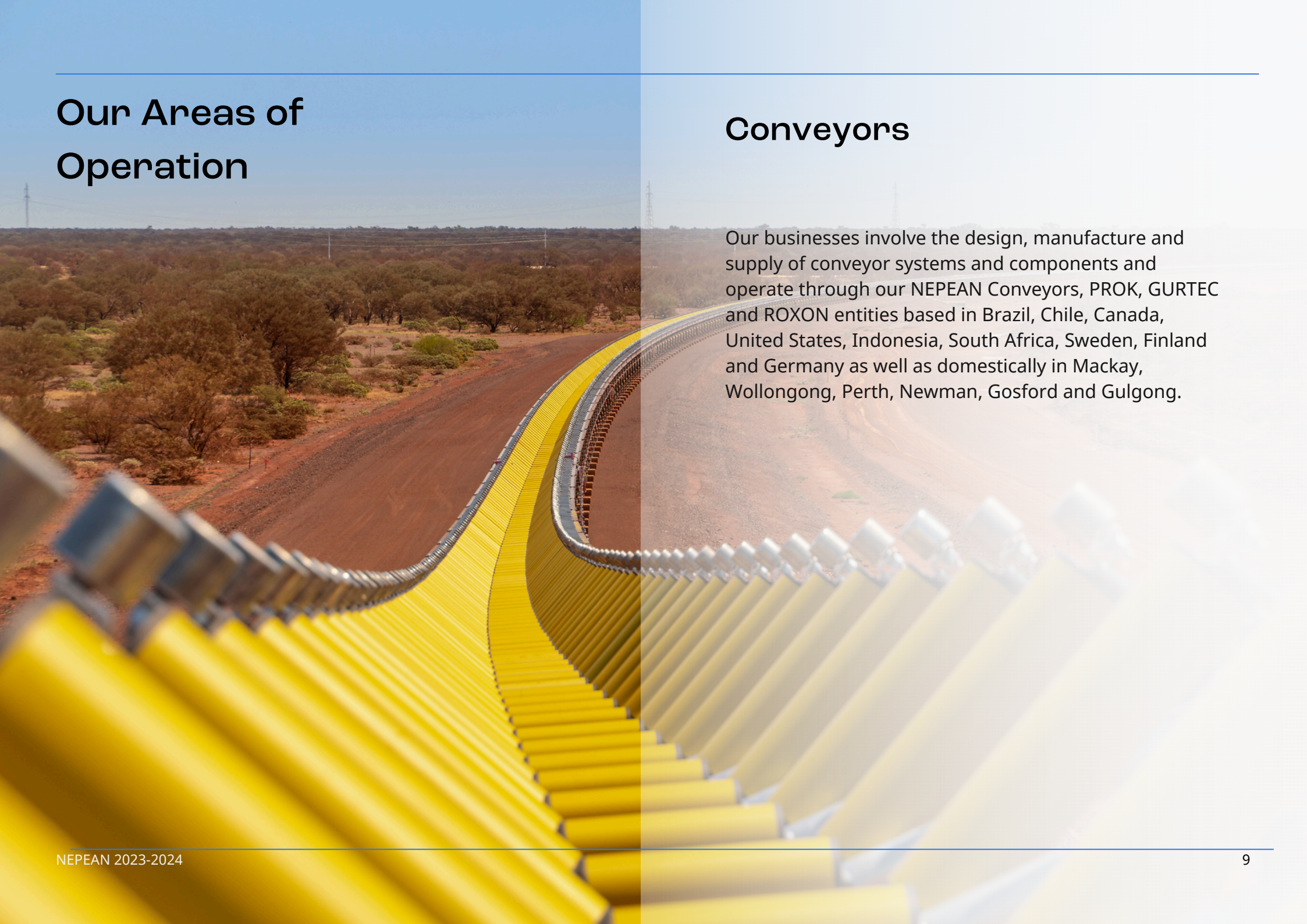
Services include:

- Industrial Access Systems
- Drainage Products
- Expanded and Perforated metal sheets
- Lintels
- Retaining Wall Systems, Handrails and Guardrails
- Galvanising Services

Mining Systems and Equipment



Our Areas of Operation



Conveyors

Our businesses involve the design, manufacture and supply of conveyor systems and components and operate through our NEPEAN Conveyors, PROK, GURTEC and ROXON entities based in Brazil, Chile, Canada, United States, Indonesia, South Africa, Sweden, Finland and Germany as well as domestically in Mackay, Wollongong, Perth, Newman, Gosford and Gulgong.



NEPEAN Longwall

Our longwall mining business operating from Rutherford NSW and MacKay QLD concentrates on the design and construction of new underground longwall mining equipment and overhaul of existing mining equipment including:

- Armoured Face Conveyors
- Powered Roof Supports
- Electro-Hydraulic and Chain Driven Conveyors
- Crushers; Longwall System Packages



NEPEAN Power

NEPEAN Power based in Thornton NSW, leads the way in the design, manufacture, supply and service solutions to power the future of industry:

- Engineering & Design - Engineering and design for high and low voltage power systems, integrity management, life extension, decommissioning and construction management.
- Electrical Products - Supply and installation of quality energy supply and management products
- Manufacturing - State-of-the-art manufacturing facilities and over 30 years manufacturing experience.
- Prefabricated Switch Rooms - Streamlined and efficient solutions for housing critical electrical components, ensuring rapid installation and enhanced operational efficiency.

Transport Equipment





Trailer Roller Brake Tester



Roller Brake Tester

NEPEAN Transport

NEPEAN Transport owns and manufactures the world's leading heavy vehicle safety equipment:

- VIS-Check heavy vehicle roller brake, steering and suspension equipment.
- VIS-Polish patented robotic aluminium wheel polishing equipment.



VIS Polish



Supply Chain

Our supply chains consist of a mixture of NSW, QLD, WA and VIC based suppliers as well as internationally from regions including Africa, Asia and the Pacific, Europe & Central Asia and the Americas. Broadly, our suppliers continue to cut across various industries and comprise of the following products and services:

- Conveyor Belts
- Electrical components such as switches, gear boxes, motors and mechanical drives
- Pulleys and Idlers
- Steel
- Hydraulics equipment
- Winding equipment
- Magnet systems
- Roof supports and structures
- Coal clearance systems and associated structures
- Chains
- Handrails
- Gratings and wire mesh
- Fasteners
- Nuts and bolts
- Purlins
- Lintels
- Wearliners

Ongoing Assessment



NEPEAN requires and promotes legal and ethical business conduct in all of its dealings and requires compliance not only of its employees, to supervisors, managers, senior managers and the Executive. New employees upon induction receive initial Modern Slavery awareness training which is ongoing.

NEPEAN's overall effectiveness in relation to Modern Slavery is annually reviewed and is aimed at raising awareness together with the minimisation of outlawed Modern Slavery practices.

Our guiding principles are underpinned by the United Nations Guiding Principles on Business & Human Rights, Universal Declaration of Human Rights and the International Labour Organisation's Declaration of Fundamental Principles and Rights at Work.



Supplier Due Diligence

Our Suppliers are expected to comply with our legal and ethical requirements as well as with their applicable regulations in their own sphere of operations. Our Commercial, Project & Finance teams augmented by our General Managers continue to carry out various supplier due diligence checks and enquiries including issuing on-boarding questionnaires, desktop assessments, visiting suppliers (and customers) on site as well as holding discussions with Suppliers as to what measures and policies they are taking and implementing within their own organisation and supply chains.

Policies

NEPEAN promotes a confidential Speak Up reporting regime backed by our HR team, where complaints or issues can be raised freely and confidentiality. This enables and encourages the reporting of incidents or potential or suspected occurrences which can then be investigated and further action taken.



Ongoing Risk Assessment & Awareness

Across our businesses each General Manager along with our shared services teams such as HR and Commercial, regularly carries out supplier risk identification processes. This includes identifying high risk regions based upon the Global Slavery Index Walk Free Foundation Regional Prevalence & Vulnerability Data Index Matrix. Our Supplier risk ratings have been designated and are as shown in the attached Location Risk Map and are graded low to high.

Continuing and building on this process and evaluation from previous years, enables us to better identify and consider potential risks. Since we reported our last statement for the 2022-2023 period, we have as indicated:

- reviewed and updated our new supplier on-boarding questionnaires
- reviewed our modern slavery training for our managers and employees and incident reporting procedure
- Provided updated feedback to Managers and also at Executive level of the Govt's further proposed developments to mandatory due diligence

Ongoing assessment and reflective practice assists with our prioritisation and implementation of our supplier engagement processes. We continue to monitor the overall effectiveness of this assessment based approach against our current adopted processes and procedures in order to seek out and identify any modern slavery risks that our business may be exposed to. This is consistent with the UN Guiding Principles on Business & Human Rights.

We continue to engage and work with our suppliers by undertaking internal governance and awareness training and through on going tracking and rating of our actions.

Contracting

Our standard purchase order terms and conditions, conditions of sale and all of our other supply and purchase agreements require our suppliers and customers to warrant and acknowledge that they have no knowledge of any Modern Slavery offences occurring within their organisation(s) or supply chain(s).

Our expectation is that they will take immediate steps to address any grievances, instances or concerns which may arise throughout the contract life cycle and through their supply chains generally, and if not, can expect to be faced with a 'Please Explain' with the ultimate sanction being a termination of the contract or purchase order.

Location Risk

Our risk rating is based upon the Global Slavery Index Walk Free Foundation Index which assesses risk rating variables and categorises them into coloured zones. Our risk rating does not consider any specific mitigations across those regions but rather provides a useful visual indicator to better identify where individual regional risk assessment is necessary.

NEPEAN continues to operate within a global framework and considering statistics and figures indicate that 50 million people were affected by some form of modern slavery occurrence (1:150 people), there is a real risk that modern slavery prevalence may be occurring within our supply chains. This may consist of forced labour, oppressive or extreme & harsh working conditions, servitude, child labour & debt bondage.

Modern Slavery in a global regulatory context

Until such time as the federal government finalises its consideration of its response to the modern slavery review, we will continue to improve our standard of modern slavery reporting and measures taken to address modern slavery risks throughout our business and supply chains.

Internationally, global recognition is growing in that various jurisdictions are strengthening regulation through either mandatory modern slavery or due diligence laws.

Specifically, with regards to our areas of operation we note that these mandated jurisdictions include Austria, Germany and Canada, with other jurisdictions no doubt soon to follow suit after tabling draft legislation such as Finland, Europe and Tasmania.

Assessing the effectiveness of our approach

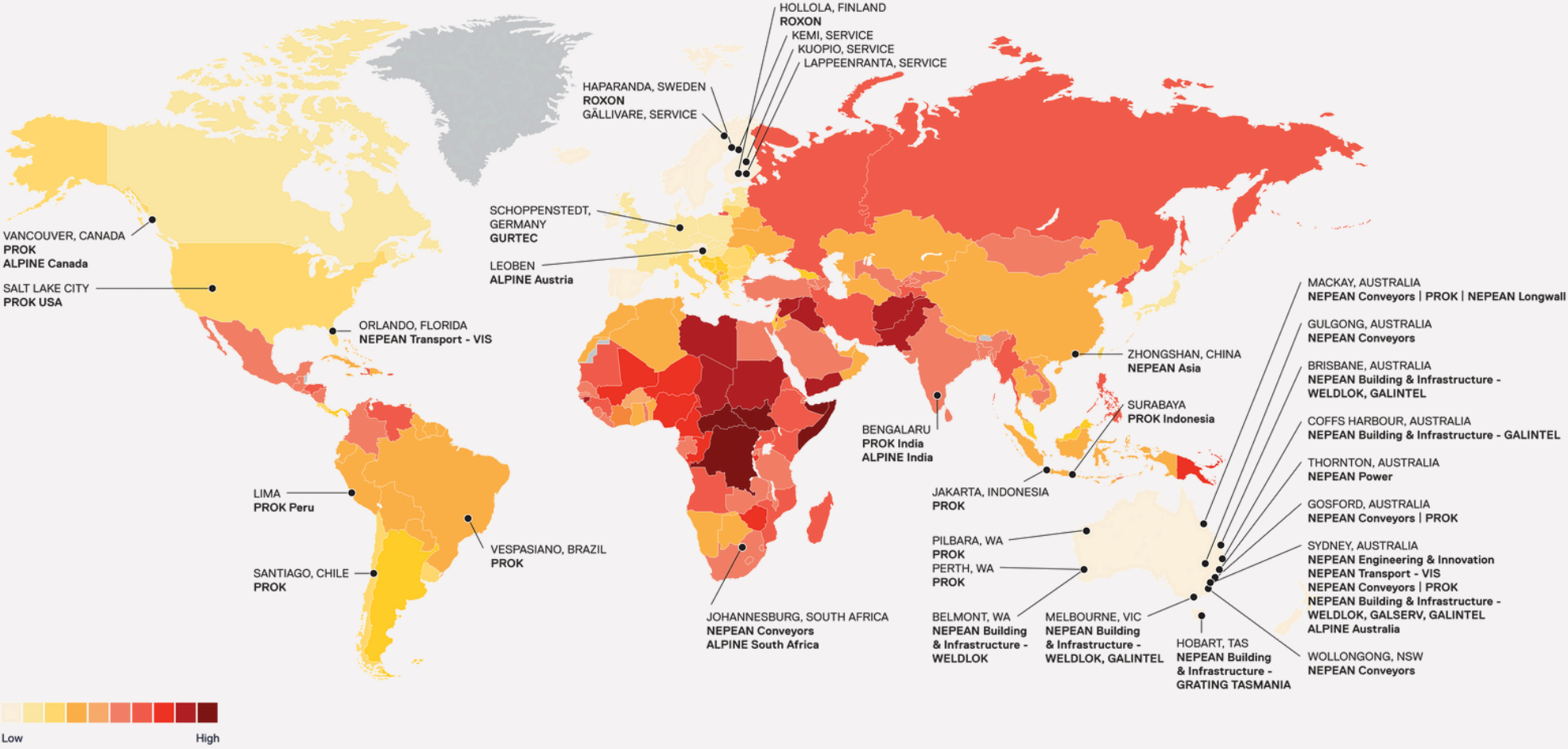
NEPEAN assesses its performance in relation to managing our modern slavery risk via ongoing assessment. This includes regularly monitoring the operations of our various business units as well as reporting to our modern slavery working group and compliance committee. Through our working group we are taking steps to strengthen our ability to identify prevent and remedy any concerns of modern slavery but enhancement of training risk reviews and tightened contractual frameworks.

As a component of some of our business units use and recruit overseas skilled based workers we are acutely aware of modern slavery risks and ensure that those persons receive additional safeguards via our employment processes by providing support, mentoring and provision of other benefits to help them settle into their new life within Australia.

Within the last reporting period we have identified various action plans which has included:

- implementing enhanced contractual frameworks
- increasing due diligence carried out against our suppliers
- enhanced education and training to our general managers and employees across our businesses
- reconfirming and restating **NEPEAN's** 'Speak up' and grievance reporting procedures and policies and evolving good practice

Location Risk Map



Forward in Review

Reporting YR 2024-2025 Planned Further Actions

Through our ongoing assessment of our approach to modern slavery we have identified the following planned actions which we will take throughout the following reporting year:

- Review and update **NEPEAN's** supplier and supply chain risk profile. This will be based on the most recent external modern slavery indices and other relevant information.
- Review and update as necessary our modern slavery policy that establishes our understanding of our approach to identify assess and manage modern slavery risk.
- Update and review our assessment of our suppliers with new questionnaires and increased due diligence and where required, engaging with suppliers to implement corrective action plans in relation to their own supply chains.
- Review and enhance where necessary our process for investigating risk allegations.
- Review our modern slavery training for our managers and employees focusing on supplier risk identification assessment and incident reporting and investigation.
- Continue to collaborate with our customers and suppliers in order to build further capacity knowledge and awareness.

Approval Statement

Any complaints brought to our attention will be investigated and further action taken, where deemed necessary. Our complaints handling, reporting processes and procedures will be reviewed in line with the Federal Anti Slavery Commissioners functions of appointment together with our remediation protocols.

This statement is a joint statement and has been prepared in accordance with s14(2) of the Modern Slavery Act 2018 (Cth). Our reporting entities are NEPEAN Building & Infrastructure ACN 125 224 302 and Nepean No.1 Pty Limited ACN 606 791 931, to which the respective Boards as the principal governing body of those reporting entities, has approved of this statement. All references throughout this statement to NEPEAN are references to the NEPEAN portfolio of companies, its subsidiaries and related entities. This statement does not cover any non-controlled joint venture operations. During the reporting period that this statement covers, NEPEAN engaged and consulted with all companies owned or controlled by it in relation to the development and creation of this statement. Details and information of the requirements of the Modern Slavery Act 2018 were discussed together with the identification of relevant future actions.