



# MODERN SLAVERY STATEMENT

2020-2021

Redpath (Australia) Holdings Pty Limited

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## 1.0 OVERVIEW

At Redpath Australia, we recognise our responsibility under the *Modern Slavery Act 2018 (Cth)* to report annually on the risks of modern slavery in our operations and supply chains, and to take meaningful action to address identified risks. Modern slavery is unacceptable within our operations and supply chain and we are committed to working together with our employees, suppliers, government and all other relevant stakeholders to ensure modern slavery does not exist in our company, our operations and our supply chains.

Our response to modern slavery during FY20 included:

- A review of all relevant Redpath Australia policies and the development and adoption of a new *Human Rights Policy* and a new *Modern Slavery Policy*;
- Revising our supply agreements to ensure suppliers of goods and services to Redpath comply with the *Modern Slavery Act 2018 (Cth)* and Redpath's related policies; and
- Ensuring Redpath's tender submissions comply with the requirements of the *Modern Slavery Act 2018 (Cth)*.

## 2.0 STATEMENT FROM THE MANAGING DIRECTOR

In this our first *Modern Slavery Statement* under the *Modern Slavery Act 2018 (Cth)*, I am pleased to outline the process and initial actions we have undertaken, and will continue to do so, to assess modern slavery risks that could exist in our business operations and supply chains and take steps to avoid such risks.

We have developed and adopted a new *Human Rights Policy* and a new *Modern Slavery Policy* confirming our commitment to protect human rights and eliminate all forms of modern slavery in our operations and supply chains. We respect internationally recognised human rights principles and acknowledge that all businesses have a role to play in eliminating modern slavery. Throughout FY20, we have commenced due diligence activities to identify, address, and prevent human rights and modern slavery issues from impacting from our operations and supply chains. We remain committed to this process and ensuring we engage all key stakeholders to develop a partnership approach.

This Statement has been approved by the Redpath Board of Directors on 17 June 2021 on behalf of all of the reporting entities listed below.

## 3.0 MANDATORY CRITERIA RESPONSE

### 3.1 Reporting Entity and Structure of Related Bodies Corporate

This Modern Slavery Statement is made in accordance with the *Modern Slavery Act 2018 (Cth)* for the period 1 July 2020 to 30 June 2021. This is a joint Statement made on behalf of the following entities ("Reporting Entities"):

• UnderAus Group Holdings Pty Limited	ACN 117 850 576	100%
• Eroc Holdings Pty Limited	ACN 097 085 973	100%
• Redpath Australia Pty Limited	ACN 067 084 708	100%
• Redpath Contract Services Pty Limited	ACN 133 126 904	100%
• Redpath Australia Coal Pty Limited	ACN 169 251 129	100%
• Redpath (PNG) Limited	Coy Number 1-60879	100%

This Statement captures the activities of Redpath (Australia) Holdings Pty Ltd, its subsidiaries and all its controlled entities.

### 3.2 About Redpath Australia Pty Limited

Redpath Australia is part of the Redpath Group and we 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.

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 Guidelines for Success contain the following statements that 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

# THE REDPATH GROUP



Longest established Canadian mining contractor since 1962.

**Full service** mining contractor offering:

Shaft Sinking	Mine Development	Contract Mining
Raiseboring	Raise Mining	Underground Construction
Coal	Engineering & Technical Services	Specialty Services

**Global coverage** with offices in five continents:

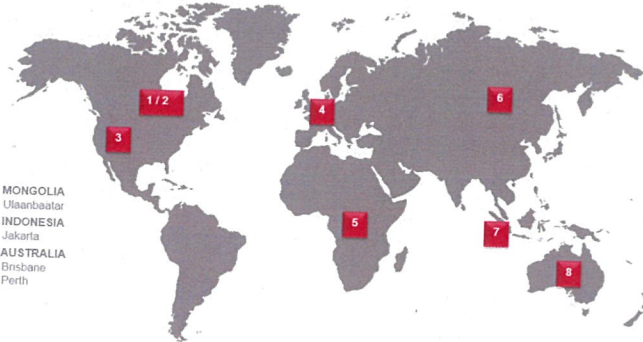
Africa	Asia	Australia
Europe	North America	South America

We take on challenges in climates and geographical locations that others won't. At Redpath, **'Challenge is an important part of life.'**



Employees (Worldwide)  
**7000+**

# WHERE WE ARE



**HEADQUARTERS**  
1. NORTH BAY, ONTARIO  
CANADA

**REGIONAL OFFICES**

- 2. CANADA  
North Bay, Ontario  
Rouyn-Noranda, Quebec  
Sudbury, Ontario
- 3. USA  
Reno, Nevada
- 4. EUROPE  
Dortmund, Germany
- 5. AFRICA  
Johannesburg, South Africa  
Kitwe, Zambia

- 6. MONGOLIA  
Ulaanbaatar
- 7. INDONESIA  
Jakarta
- 8. AUSTRALIA  
Brisbane  
Perth

# REDPATH AUSTRALIA



Redpath Australia are a leading underground mining services contractor with offices in **Brisbane** and **Perth**.

**We strive** to be the safest company to work for in our industry – our commitment is that all our employees return home unharmed every day.

**We establish** long-term, stable relationships with our Clients', providing a level of service exceeding industry standards, and are viewed as a continuing partner in their underground operations.

**We provide** a supportive and rewarding work environment that attracts and retains employees who are valued and developed within our organisation.

**We aim** to be the preferred contractor to mine owners and operators that seek to engage a contractor with similar values and is supportive of a strong safety culture.



Employees (Australia)  
**1000+**

redpathmining.com | 1

### 3.3 Modern Slavery Risks

Recent Australian mining and human rights guidance suggests that for many mining companies operating in Australia, the most significant modern slavery risks are likely to be in the supply chain. Redpath Australia also tenders for projects in overseas locations that may require direct employment of nationals or sourcing local labour via in-country labour hire providers.

Modern slavery risks identified for Redpath Australia include:

Risk Category	Risk Description
Supply chain management risks	<ul style="list-style-type: none"> <li>Supplier does not have a policy or process that prohibits modern slavery in its operations and in those of its suppliers</li> <li>Supplier does not have policies and processes to identify, investigate and remedy risk and instances of modern slavery</li> <li>Supplier cannot demonstrate employee training to manage modern slavery risk</li> <li>Supplier does not conduct due diligence for modern slavery risks on its suppliers</li> <li>Supplier does not require suppliers to conduct due diligence for modern slavery on their suppliers</li> </ul>
Supply chain labour risks	<ul style="list-style-type: none"> <li>Supplier is in contravention of the United Nations International Labour Organisation (ILO) conventions that prohibit the worst forms of child labour</li> <li>Supplier does not undertake checks to ensure child labour is not being used within its organisation or suppliers</li> <li>Supplier cannot demonstrate compliance to fair work principles or the Fair Work Act 2009 (Cth)</li> <li>Supplier does not have a mechanism to anonymously raise issues related to labour conditions or workplace grievances</li> </ul>
Supply chain goods risks	<ul style="list-style-type: none"> <li>Supplier has a facility (or facilities) in locations identified as 'high risk'</li> <li>Supplier provides goods/materials or services identified as 'high risk'</li> </ul>
In-country labour hire risks	<ul style="list-style-type: none"> <li>Labour hire provider does not meet minimum employment standards or wage levels as required under contract terms</li> </ul>

### 3.4 Actions Taken to Assess and Address Risks

The following actions have been implemented during the reporting period to address the risk categories outlined above.

- A Modern Slavery Policy has been developed which will be used for tenders, customer enquiries and to educate staff. This Modern Slavery Policy underpins this Modern Slavery Statement on a practical level, giving Redpath Australia a document which can be utilised on an everyday basis. This policy also helps to ensure compliance and transparency in our business and in our approach to eradicating any modern slavery identified throughout our supply chains
- Redpath has now revised supply agreements to ensure suppliers of goods and services to Redpath comply with the Modern Slavery Act 2018 (Cth) and Redpath's related policies.
- Redpath's tender submission templates have been reviewed and modified to ensure all future tender submissions comply with the requirements of the Modern Slavery Act 2018 (Cth).
- Redpath Australia has a 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 Australia's whistle blower policy.

### 3.5 Measures to Assess the Effectiveness of the Actions Taken

Redpath Australia have commenced the development and implementation of a supplier assessment questionnaire and review process to periodically monitor supplier practices to ensure that modern slavery risks are identified, critically assessed and appropriately addressed to remove modern slavery risks from Redpath's supply chain. Such assessments may result in an audit of the supplier's policies, practices and/or operational facilities to determine whether (i) any corrective actions are required; or (ii) existing systems in place are effective in managing the risk(s) identified.

Performance against our planned actions and commitments will be assessed and reported in our annual Modern Slavery Statement. Our policies and practices are reviewed regularly and updated as appropriate to reflect changes in law and developments in corporate governance. As an example, in FY20, we developed a new Redpath Australia Human Rights Policy and Modern Slavery Policy.

This process of review will continue in the 2021/22 Financial Year.

### **3.6 Consultation Process**

Identification and implementation of actions to assess and manage our modern slavery risks involves consultation and engagement across Redpath Australia, in collaboration with our associated and subsidiary companies. We are considering the establishment of a Human Rights and Modern Slavery reference group to be a key advisory and monitoring function to enable and support ongoing consultation with our workforce and suppliers.

Our Redpath Australia Executive Management Team and the Redpath Board of Directors are briefed on modern slavery regulatory requirements, our risks and responses including this Modern Slavery Statement.

## **4.0 RESPONSIBILITIES**

### **4.1 Compliance, Monitoring and Review**

This Statement will be reviewed and updated quarterly, with a formal report submitted on an annual basis in accordance with legislative reporting requirements.

### **4.2 Reporting & Records Management**

The Redpath Australia Commercial Department will keep records of any reported or detected incidents of Modern Slavery and any action taken to address the incident.

## **5.0 RELATED LEGISLATION AND KEY DOCUMENTS**

- Modern Slavery Act 2018 (Cth)
- Redpath Australia Human Rights Policy
- Redpath Australia Modern Slavery Policy
- Redpath Code of Business Conduct