

Normet Asia Pacific Pty Ltd (ABN 73 119 159 625) Modern Slavery Statement 2024





### 1. About Normet Asia Pacific Pty Ltd

Normet Asia Pacific Pty Ltd (**Normet AP**) is a world-leading, innovative technology company. We define the future of underground operations in mining, tunnelling, and civil engineering projects, helping our partners increase safety, sustainability, and productivity throughout the lifecycle of their projects.

Normet AP is a caring, committed, and courageous company. We establish long-term relationships with our customers and partners to find optimum solutions to challenges that will have positive impacts on people and the environment. We supply a full range of services and products that constantly deliver maximum value to our clients, providing high-performance products and services that generate a sustainable future.

Since 1962 we have developed our offerings to include a complete portfolio of mining and tunnelling solutions for the entire process chain, including processes such as concrete spraying, underground logistics, explosives charging, scaling, lifting, and installation works.

Normet AP is an Australian private company headquartered in Adelaide, South Australia, and is a wholly owned subsidiary of Normet Group Oy (**Normet Group**), which is headquartered in Finland. In total, the Normet Group employs over 1,700 dedicated professionals in more than 50 locations in 30 countries around the world, committing to long-term, mutually beneficial partnerships that create value in our industry and society as a whole.

Normet AP's registered address and principal place of business is located at 10 Ashwin Parade, Torrensville, Adelaide SA 5031, Australia.

In the reporting period, Normet AP also had offices in Sydney (NSW), Kurri Kurri and Orange (NSW), Mount Isa (Qld), Boronia (VIC), Kalgoorlie (WA) as well as Perth and Wangara (WA).

Normet Group exclusively carries out business in Australia through Normet AP. Normet AP does not own or control any other entities in Australia.

### 2. Modern Slavery Statement Approval

This Modern Slavery Statement (**Statement**) has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) (**Act**). This Statement reports on the period 1 January 2024 to 31 December 2024 (**Reporting Period**).

This Statement was approved by the Normet AP Board in its capacity as principal governing body as defined in the Act.

#### **Signature of Responsible Member**

This Statement was approved by the board of directors of Normet AP and signed by Mark Sinclair in his role as director of Normet AP and the Vice President, Sales Area APAC of Normet AP and who is a responsible member of Normet AP as defined by the Act, on 30/06/2025.

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Mark Sinclair
Vice President, Sales Area APAC





### 3. Normet's Operations and Supply chain

Normet AP provides equipment, construction chemicals, rock reinforcement, and parts and services to the mining industry in Australia. Further details about where Normet AP sources this equipment and material from is set out below.

### **Equipment**

- Concrete Spraying
- Concrete Transportation
- Explosives Charging
- Lifting and Installations
- Scaling
- Underground Logistics
- Aliva Products
- X-Rock, Rock Breaking Equipment
- Normet SmartDrive® Equipment Offering

#### **Rock Reinforcement**

- Dynamic Bolts
- Self-drilling Anchors / Bolts
- Cable Bolts

### **Construction Chemicals**

- Sprayed Concrete Essentials
- Sprayed Concrete Application Aids
- High Performance Concrete Admixtures
- Bolt Grouts
- Water Control Injection Materials
- Ground Engineering Injection Materials
- TBM (Tunnel Boring Machine) Products
- Waterproofing Coating & Additives
- Readymix & Precast Admixtures
- Concrete Repair

### **Parts & Services**

- Field Services
- Genuine Parts
- Remanufacturing
- Upgrades and Modifications
- Rentals
- Digital Services
- Normet Training Solutions
- Service Agreements



In the Reporting Period, Normet AP was involved in a number of projects across its Australian operations.

Project	About Project
Olympic Dam	The BHP Olympic Dam mine is a large poly-metallic underground mine located in South Australia, 550 km NNW of Adelaide. It is the fourth largest copper deposit and the largest known single deposit of uranium in the world. Copper is the largest contributor to total revenue, accounting for approximately 70% of the mine's revenue, with the remaining 25% from uranium, and around 5% from silver and gold. Redpath Australia is a major contractor engaged to undertake underground mining related services on the project.  Throughout the Reporting Period, Normet Asia Pacific Pty Ltd has continued to supply Redpath Australia with concrete spraying and logistic equipment
Coffs Harbour Bypass Project	under direct purchase and hire agreements for daily operations along with ongoing maintenance, training and supply of parts maintain the fleet on site.  The Gamuda Ferrovial Joint Venture was awarded the contract to deliver 14km of new and upgraded four-lane dual carriageway road including three tunnels (about 1km long in total) at Roberts Hill, Shephard's Lane and Gately's Road. The project is using drills and controlled blasting construction.  Normet Asia Pacific Pty Ltd is a key partner on the project supplying shotcrete spraying equipment, equipment servicing, training, waterproofing membranes, shotcrete accelerator and construction related chemical products across the project.



In the Reporting Period, Normet AP employed just under 170 people across a variety of roles across South Australia, Western Australia, New South Wales and Queensland.

Normet AP's primary business of equipment supply, rock reinforcement, rock breaking products, construction chemicals, parts and servicing, as listed above, are primarily supplied by Normet Group through its Global Distribution Centre (GDC), which is located in the Netherlands. The Normet Group's GDC complies with the United Nations Universal Declaration of Human Rights and the Declaration on Fundamental Principles and Rights at Work by the International Labour Organization.

Of the 154 other primary suppliers to the Normet AP business, 142 or 92.2% of these suppliers are located in Australia. The other 12, or 7.8% of external suppliers, are located internationally in the following locations, Seoul in South Korea, Taupo in New Zealand, Sunne in Sweden, Chennai and Bharuch in India, and Shanghai and Qingdao in China. Of those suppliers located internationally, outside of the GDC, only 5 of those suppliers have orders valued at more than \$50,000.00 per annum. Further details regarding Normet AP's requirements of its suppliers is set out below.

Ancillary supplies used at Normet AP, such as office supplies, uniforms, work use vehicles, IT equipment, and telecommunications, are all supplied by large Australian national businesses, many of whom report their own modern slavery statements or have them in place for when they are required to formally submit those statements. Again, Normet AP's Director HSEQ – APAC, conducted an audit of ancillary suppliers used by Normet AP, by reaching out to them personally to discuss the actions they take to manage risks of modern slavery, by checking the Modern Slavery Statements Register, and by reviewing their websites to ensure these suppliers are addressing the risks of modern slavery in their operations and supply chains.

Normet Global's Supplier Code of Conduct sets out Normet AP's minimum requirements for its suppliers. These requirements are in line with Normet AP's own Code of Conduct and are the basis for continuous improvement in how to engage in responsible business.

As part of our risk mitigation into the issues surrounding modern slavery, Normet Global requires all those working with the group globally to adhere to Normet Global's trade Compliance Policy. This policy outlines that Normet Global does not conduct business in or with any business partners from countries which Normet Global considers are high risk<sup>1</sup>, and applies additional trade compliance measures for any proposed business in, or with, business partners from countries where Normet Global considers there is increased risk of sanctions violations.<sup>2</sup>



Normet Global also requires all of its suppliers to adhere to the

Normet Supplier Code of Conduct and that all working with Normet Global (including Normet AP) adhere to the Normet Code of Conduct that enforces the UN Declaration of Human Rights, especially as it relates to modern slavery risks.

<sup>&</sup>lt;sup>1</sup> These countries are Cuba, Iran, North Korea, Syria, Russia, an the following regions of Ukraine, namely, the Crimea region, the Donetsk region, the Luhansk region, the Zaporizhzhia region and the Kherson region of Ukraine.

<sup>&</sup>lt;sup>2</sup> These countries are Afghanistan, Belarus, Burundi, Central African Republic, Guinea-Bissau, Guinea, Democratic Republic of Congo, Iraq, Lebanon, Libya, Mali, Myanmar (Burma), Nicaragua, Pakistan, Somalia, Republic of South Sudan, Sudan, Tunisia, Venezuela, Yemen, and Zimbabwe.



Normet AP continuously reviews its company strategy. Normet AP is dedicated to continual improvement in compliance and sustainability and view its responsibilities in relation to Corporate Governance and accountability as a commitment to its staff and its customers.

For Normet AP, good governance means maintaining transparency, internal controls, accountability, compliance with laws, and business integrity in Normet Group's operations. Regulatory and ethical compliance in relation to, for example, human rights, anti-corruption, bribery, tax compliance and fair competition, are the fundamental principles in Normet AP's Code of Conduct.

# 4. Risks of Modern Slavery Practices and Actions taken to address Modern Slavery Risks

Acknowledging areas where there could be vulnerabilities for modern slavery practices, Normet AP has researched, developed, understood and identified risks in the following areas:

#### IDENTIFIED RISKS: Workers in vulnerable demographic locations and high-risk geographic areas:

Commonly infringed human rights in the resources and energy sectors where Normet partners:

- Right to freedom from slavery and slavery-like conditions
- Right to freedom from discrimination
- Right to free, prior and informed consent
- Right to health
- Right to self-determination
- Right to water
- Right to a healthy environment
- Right to safety at work
- Right to traditional culture
- Freedom of assembly and association and right to strike.

Normet AP staff and suppliers are required to be committed to providing a safe and healthy working environment for all employees and contractors working for it. In the Reporting Period, Normet AP ensured that relevant and functioning personal protective equipment was provided, free of charge, to

all employees. Normet AP staff and suppliers have an occupational health and safety management system in place, as required by the various State work health and safety legislative schemes.

In the Reporting Period a rapid response to the geopolitical situation in Europe led to the discontinuation of new orders and deliveries by Normet Global into Russia. Normet Global focused on securing employee safety and well-being and provided financial aid to UNICEF to support those directly impacted by the war in Ukraine.

#### **IDENTIFIED RISKS: Supply Chain: high-risk procurement categories:**

Some areas where Normet AP is currently a partner include those procurement areas that are frequently seen as high-risk by resource and energy firms, <sup>3</sup> such as:

- Personal Protective Equipment (PPE) and uniforms
- Chemicals and raw materials



<sup>&</sup>lt;sup>3</sup> Australian Human Rights Commission and KPMG Australia (2021) Resources, energy and modern slavery Practical responses for managing risk to people: KPMG, <a href="https://humanrights.gov.au/our-work/business-and-human-rights/publications/resources-energy-and-modern-slavery-practical">https://humanrights.gov.au/our-work/business-and-human-rights/publications/resources-energy-and-modern-slavery-practical</a> (Accessed: 28 September 2023).



- Tyres and wheels
- Electrical parts and electronic equipment, including metering equipment
- Mechanical parts
- Fabricated metals

To help mitigate modern slavery risks in these areas, as part of its service agreement with all suppliers, Normet AP:

- Requires that suppliers ensure that their own supply chain complies with sanctions laws and trade restrictions imposed by the United States, the United Nations, and the European Union.
- Insists that suppliers who manufacture products or parts based on their own design commit to informing Normet AP in case their products or parts are subject to trade restrictions.
- Demands that suppliers who manufacture products or parts containing 'conflict minerals' (e.g. tin, tantalum, tungsten, gold) declare that their supply does not contain minerals originating from conflict-affected and highrisk areas as specified in European Union Regulation 2017/821 and related directives or regulations, or in Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act of the United States of America.
- In relation to reporting, suppliers are required to report any actual or suspected violations of this Code of Conduct to Normet AP. Normet AP will not take or tolerate any action or retaliation against any person reporting a suspicion of misconduct in good faith.

#### **IDENTIFYING RISKS - ESG:**

Normet AP uses a framework called environmental, social, and governance (ESG) to evaluate an organisation's operations and performance on many ethical and sustainable concerns. It also offers a tool to gauge the opportunities and hazards for business in certain fields.

The ESG framework is used and understood by Normet AP as a tool to understand more broadly the mining and metals sector and how this impacts business risk.

The top ESG issues identified, according to Paul Mitchell at EY, who conducted an analysis of the business risks and opportunities in the mining sector 2023 are:<sup>4</sup>

- Local Community Impact
- Water Management
- Decarbonization
- Climate Change
- Green Production
- Scope 1 and 2 emissions
- Diversity, equity and inclusion
- Scope 3 emission
- Modern Slavery
- Child Labor

Normet is dedicated to addressing these risks as part of its strategic planning by continuing to improve its business transparency; improving on an already healthy safety culture; committing to continual improvement in compliance; monitoring and strengthening internal governance structures and reporting and continuing to understand the complex requirements of competition law, bribery and corruption policies and ensuring ongoing trade compliance.

<sup>&</sup>lt;sup>4</sup> Mitchell, P.D. (2022) Top 10 business risks and opportunities for mining and metals in 2023, Top mining and metals risks and opportunities in 2023 | EY Australia. <a href="https://www.ey.com/en\_au/mining-metals/risks-opportunities">https://www.ey.com/en\_au/mining-metals/risks-opportunities</a> (Accessed: 06 June 2023).



### **RESPONSE FRAMEWORKS**

Modern Slavery and Human Rights Management Process	Normet AP approach	
Grievance Handling	Normet AP has a Grievance Handling Procedure which allows for complaints	
Procedure	around modern slavery risks and human rights issues to be raised.	
	Normet AP utilizes the following procedure to ensure that the grievance is fully	
	understood and treated with the necessary formality:	
	1. Preliminary Action – the grievance may be taken by any means	
	2. Acknowledgement of grievance	
	Information gathering     Mediation (if necessary)	
	5. Outcome	
	Confidentiality is maintained where possible to progress the grievance as	
	appropriate. Normet AP ensures that complainants are not subject to victimisation	
	for making the grievance.	
Improving the Normet	In the Reporting Period, Normet AP, together with Normet Global, reviewed the	
Supplier Code of Conduct	Supplier Code of Conduct and made the following improvements:	
	<ul> <li>Versions of the Code were translated into English, Chinese and Spanish languages.</li> </ul>	
Training our people	In the Reporting Period, all newly engaged Normet AP staff were trained in all topics	
	relevant to modern slavery / human rights / ESG. This training forms part of our	
	employee onboarding process and includes content such as:	
	<ul><li>What is Modern Slavery?</li><li>What does Modern Slavery look like?</li></ul>	
	Signs of Modern Slavery.	
	Forced Labour.	
	Visa Exploitation.	
	Domestic Servitude.	
	Forced Marriage.	
	Sexual Exploitation.	
	Stories of Modern Slavery	
	Understanding the Act and the role we play at work and as individuals	
Evaluation of sustainability	Normet AP has continued with its plans to evaluate the environmental	
risks in the supply chain	sustainability of its supply chain in the coming reporting period. It has engaged an	
	independent environmental auditing firm to undertake this work with a lens on	
	Normet AP and Normet Global's environmental footprint and risks and to advise on mitigation strategies.	
Human Rights Policies and	Normet AP has and maintains the following policies and procedures which support	
Procedures	our employees in maintaining their human right to a safe work place that is ethically	
	driven and free from hazards of both a physical and psychological nature:	
	Code of Conduct	
	Employee Assistance Program Policy	
	Flexible Working Arrangement Policy	
	Parental Leave Policy	
	Workplace Harassment Prevention Policy	
	Normet Health & Safety Policy	
	Environmental Policy	



Modern Slavery and Human Rights Management Process	· · · · · · · · · · · · · · · · · · ·	
	Safety Reporting	
	Health and Safety Management System	
	Risk Management	
	Emergency Management	
	Fire Prevention	
	Additionally, Normet AP is developing a local Supplier Code of Conduct to help	
	ensure that locally sourced goods and services do not pose a modern slavery risk.	

# 6. Assessment of the effectiveness of risk mitigation and remediation strategies at Normet and future commitments to reducing modern slavery risks

Normet AP strives to be a business that leads through the ethical standards it sets and the performance it achieves, a business that demonstrates how corporations can contribute to addressing global issues such as Modern Slavery.

Normet AP believes that our future as a company depends on acting with integrity at all times and in all areas. Normet AP believes in continual improvement as the key to effective risk mitigation and the success of remediation strategies.

Currently, Normet AP staff and suppliers must comply with applicable national and international laws, regulations, and generally accepted practices in its business and in the products and services that Normet AP is connected to.

Normet AP is committed to continual improvement in this area, which is necessary and important now and into the future. Enhancing our risk identification methodologies over time includes:

- Our commitment to recognising inherent and residual business risks, both internally and externally
- Building on our current ESG frameworks
- Revision and audits of our supplier management and monitoring systems and controls
- Close supervision of any external third-party reporting on modern slavery risks, with revision of our current controls and risk mitigation strategies

Normet AP reviews the effectiveness of these and other risk control measures outlined in this statement through an annual review of its approach to addressing modern slavery risk. Lead responsibility for this review is allocated to the Director HSEQ – APAC for Normet AP but is conducted in conjunction with various stakeholder departments within Normet AP, including its people and culture and procurement teams. The review considers, amongst other things, how Normet AP has tracked against goals for implementation of certain measures to address modern slavery risks and potential new initiatives for addressing modern slavery risks.



### **Annexure A – Statement Annexure**

Mandatory Reporting Criteria		Reference in this Statement
a)	Identify the reporting entity	"1. About Normet"
b)	Describe the structure, operations and	"3. Normet's Operations and Supply chain"
	supply chains of the reporting entity	
c)	Describe the risks of modern slavery	"4. Risks of Modern Slavery Practices and Actions
	practices in the operations and supply	taken to address Modern Slavery Risks"
	chains of the reporting entity, and any	
	entities that the reporting entity owns or	
	controls	
d)	Describe the actions taken by the reporting	"4. Risks of Modern Slavery Practices and Actions
	entity and any entity that the reporting	taken to address Modern Slavery Risks"
	entity owns or controls, to assess and	
	address those risks, including due diligence	
-1	and remediation processes	(C. Assessment of the offsetive and of sight
e)	Describe how the reporting entity assesses the effectiveness of such actions	"6. Assessment of the effectiveness of risk mitigation and remediation strategies at Normet
	the effectiveness of such actions	and future commitments to reducing modern
		slavery risks"
f)	Describe the process of consultation with:	Not applicable – Normet AP does not own or
',	(i) any entities that the reporting entity	control any other entities, and this is not a joint
	owns or controls; and (ii) in the case of a	statement.
	reporting entity covered by a joint	
	statement, the entity giving the statement	
g)	Include any other information that the	Throughout
	reporting entity, or the entity giving the	
	statement, considers relevant	
Details	of approval by the principal governing body	"2. Modern Slavery Statement Approval"
of the reporting entity		