



MODERN SLAVERY STATEMENT

Redpath (Australia) Holdings Pty Ltd

ACN 133 126 682

Reporting year ended 31 December 2022

Document Reference No: 21-22

Issued: 7 November 2023

Safety – First, Last and Always.

DOCUMENT SUMMARY

Written By	Emma Fairley
Contributors	Craig Howard

REVISIONS

REV NO.	DATE	REVISED BY	SUMMARY
1	1 July 2021	n/a	
2	1 July 2022	Emma Fairley	Updated to address mandatory criteria for modern slavery statement
3	7 November 2023	Craig Howard	Refreshed

DOCUMENT APPROVAL


APPROVER NAME	TITLE	SIGNATURE	DATE
Gavin Ramage	Managing Director – Redpath Australia		7 November 2023

TABLE OF CONTENTS

1.0	ABOUT REDPATH.....	4
1.1	Our Business	4
1.2	Philosophy and Guidelines	4
2.0	THE REPORTING ENTITY	4
3.0	REDPATH SUPPLY CHAINS	5
4.0	MODERN SLAVERY RISKS.....	5
5.0	CONTROLS & ASSESSMENT	6

1.0 ABOUT REDPATH

1.1 Our Business

The Redpath Group has been in the mining services business since 1962, originally focused on the Canadian mining industry. The Group takes its name from its founder Jim Redpath, and the business still operates using the Philosophy and Guidelines for Success established by Jim as the business developed.

Today, The Redpath Group is managed from Redpath's head office in North Bay, Ontario, Canada and is owned by Aton 2 GmbH in Germany.

Over time, the Redpath Group has grown and expanded to service its contract mining clients around the world and today is involved in underground mine development, contract mining, tunnelling, shaft sinking, raiseboring, mechanised raising and underground installations. Currently, the Redpath Group has permanent offices in Australia, Canada, Chile, Germany, Indonesia, Mongolia, South Africa, and the United States of America and operates projects in many other parts of the world including significant projects in Indonesia and Mongolia.

Redpath Australia ("Redpath") 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.

Here at Redpath we understand that businesses play a vital role in eradicating modern slavery, which includes the crimes of human trafficking, forced labour, servitude, debt bondage, and the exploitation of children. Redpath recognises that respecting the right to be free from modern slavery is embedded in our company Guidelines for Success but requires a focused and collective commitment and responsibility to ensure we meet our ethical and legal obligations.

In this Modern Slavery Statement under the Modern Slavery Act 2018 (Cth), we are pleased to outline our 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 in the future.

1.2 Philosophy and Guidelines

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.

2.0 THE REPORTING ENTITY

This Modern Slavery Statement is for Redpath (Australia) Holdings Pty Ltd ACN 133 126 682 and

made in accordance with the Modern Slavery Act 2018 (Cth) for the period 1 January 2022 to 31 December 2022. This is a joint Statement made on behalf of the following wholly owned entities ("Reporting Entities"):

- UnderAus Group Holdings Pty Limited (ACN 117 850 576)
- Eroc Holdings Pty Limited (ACN 097 085 973)
- Redpath Australia Pty Limited (ACN 067 084 708)
- Redpath Contract Services Pty Limited (ACN 133 126 904)
- Redpath Australia Coal Pty Limited (ACN 169 251 129)

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

Redpath is owned by Redpath Mining Inc. (Canada) which is owned by ATON 2 GMBH. ATON was founded 2001 in Fulda, Germany. The ATON Global Group operates in four business segments: Engineering, Mining Technology, Medical Technology and Aviation.

3.0 REDPATH SUPPLY CHAINS

Redpath's supply chain includes the procurement of goods and services.

In FY23 Redpath had 1100 active suppliers with a total spend of \$336 million dollars (AUD). Most of our suppliers are in Australia. Our major supply chains include the following services and products:

- Equipment and spares
- Consumables
- Oils and lubricants
- Site utilities and infrastructure
- Freight and transport
- Explosives
- Travel & Accommodation

Redpath recognises that its suppliers may source products from outside Australia, which has the potential to present a risk to modern slavery.

In FY23 Redpath undertook a rigorous exercise to reduce our suppliers and negotiated National Agreements with our major category suppliers.

This exercise and decision process included assessing where the products were sourced and assessed whether the supplier had appropriate modern slavery tools to mitigate any risk and practiced ethical sourcing.

4.0 MODERN SLAVERY RISKS

Redpath have identified that the 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 DISCRIPTION
Supply chain	<ul style="list-style-type: none"> • Supplier does not have a policy or process that prohibits modern slavery in

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

5.0 CONTROLS & ASSESSMENT

Redpath's goal to maintain responsible and transparent supply chains. Redpath has implemented the following policies and procedures to reduce the risk of modern slavery in our supply chain.

CONTROL CATEGORY	ONGOING CONTROLS IN PLACE	ASSESSMENT EFFECTIVENESS
Governance	<p>Key Policies that address human rights and modern slavery for Redpath:</p> <ul style="list-style-type: none"> • Code of Conduct • Modern Slavery Policy • Diversity and Inclusion Policy • Grievance Policy 	Internal Audits to ensure employee all trained in code of conduct and track completion of training
Supply Chain goods & labour	<ul style="list-style-type: none"> • Conduct due diligence in new supplier requests • Continue to ensure suppliers of goods and services to Redpath comply with the Modern Slavery Act 2018 (Cth) and Redpath's related policies. 	Internal Audits to ensure new suppliers are aware of our modern slavery Policy Statement

Reporting	<ul style="list-style-type: none"> 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's whistle blower policy. 	Internal Compliance checks to ensure all reports made our investigated
-----------	--	--

6.0 LOOKING AHEAD

Redpath is continuing to develop and implement frameworks to assess and monitor the risks of modern slavery in our operations and supply chain. Redpath recognises that the risks of modern slavery are complex and evolving. Redpath will continue to work to address these risks in our business and engage with a range of stakeholders to assess the effectiveness of our actions and enhance our approach.

This statement was approved by the Board of Redpath on 7 November 2023., on behalf of itself and the other reporting entities covered by this statement.



Gavin Ramage

Managing Director

Redpath (Australia) Holdings Pty Ltd

7 November 2023