

MGM BULK

DRIVEN TO DELIVER

MODERN SLAVERY STATEMENT FY2022

STATEMENT BY DIRECTOR

MGM Bulk Pty Ltd ACN 165 448 920, registered office AMD Level 1, 53 Victoria Street, Bunbury WA 6230 ('MGM Group'), recognises that we have an on-going obligation to identify, prevent and manage the risk of modern slavery and slavery-like practices within our business's operations and supply chain network.

Modern slavery including eight types of serious exploitation: human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and child labour, will not be condoned by MGM Group. Modern Slavery practices and those individuals or organisations that enable Modern Slavery to exist, are not aligned with the MGM Group values of "Honesty, Integrity and Excellence".

MGM Group is committed to playing our role in eliminating the risk of modern slavery in our operations and supply chain network and therefore we will continue to assess our practices and those within our supply chain to submit annually our modern slavery statement.

This statement has been published for the 2022 Financial Year in accordance with the requirements of the Modern Slavery Act 2018 ('the Act') and sets out the steps taken by MGM Group for the reporting period.

OUR HISTORY & STRUCTURE

MGM Group was founded in 2004 by Mario Giacci together with his daughter Giuditta (Giudi) and son Michael. In 2014, MGM Group added a bulk division to its operations, known as MGM Bulk.

MGM Group operates in Western Australia within four regions across the state including, Bunbury (head office location), Picton, Perth, Geraldton and Port Hedland.

MGM Group has 60 years of experience within the bulk haulage industry, servicing mining companies that require bulk haulage, storage, warehouse management, ship loading, rail loading and stockpile management services. We are a national Australia wide business, however a significant amount of our services is provided to mining clients all over Western Australia.

MGM Group has a workforce in excess of 400 employees and over 539 suppliers including local, national, and international suppliers.

MGM Group's growth over the years has seen the group project to reach an annual consolidated revenue of over \$100 million for the financial year ending June 2022.

MGM Group acknowledges that it is required to submit its modern slavery statement within six months from the end of each reporting period.

OUR SUPPLY CHAIN

In the 2022 financial year period, MGM Group’s supply chain has grown to over 539 suppliers that includes local, national, and international suppliers who provide a range of multi-layered goods and services through various industries. Of those suppliers, the major sectors industries in which they operate include:

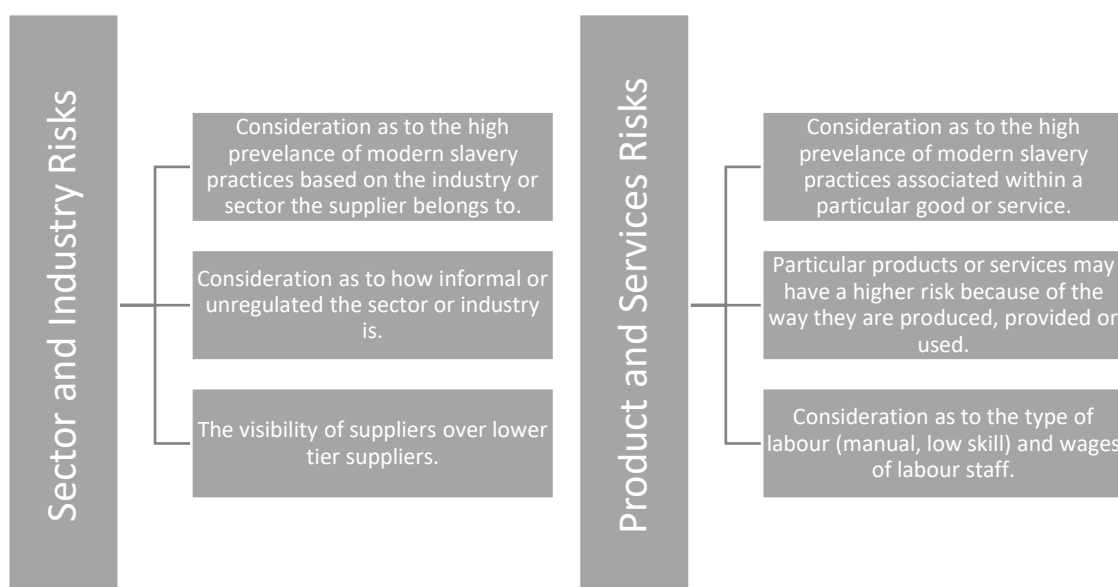
- Mining, exploration and development.
- Accommodation providers
- Tyre supply and services providers
- Information Technology and Technology Support
- Road transport equipment manufacturing and servicing
- Fuel, petroleum products and consumables for power stations and gas infrastructure
- Freight and transportation services

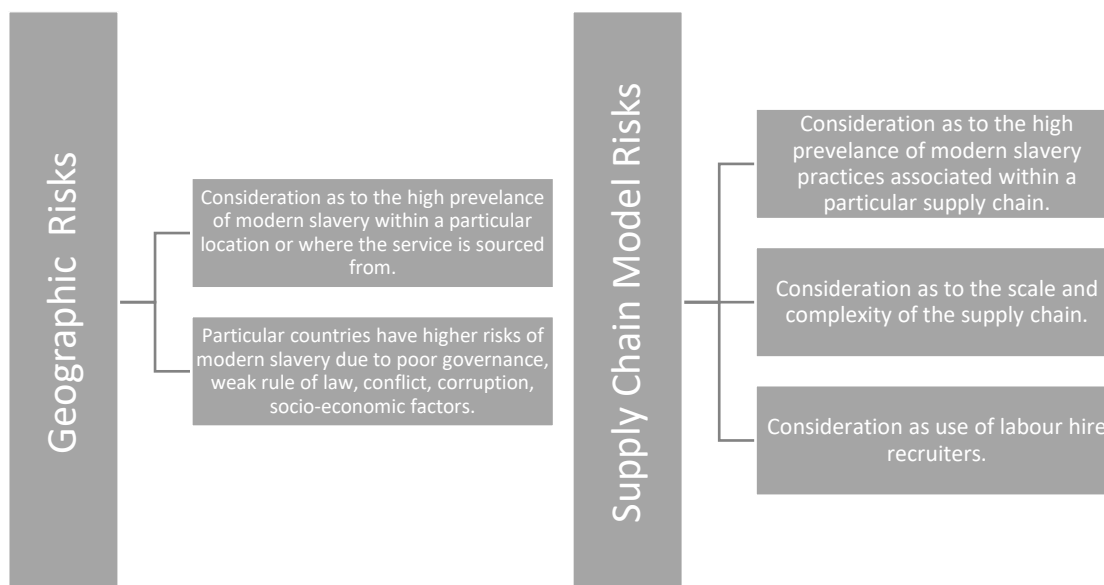
During the reporting period, MGM Group have identified 12 tier one suppliers were assessed based on how critical their services are to the operations of MGM Group, their scale, volume and value of services. Of the 12 tier one suppliers, 6 are ‘reporting entities’ under the Act and have published modern slavery statements.

OUR RISK ASSESSMENT OF MODERN SLAVERY PRACTICES

SUPPLY CHAIN ASSESSMENT

To assess the risk of modern slavery within our supply chains, we have undertaken a high-level analysis of our tier one suppliers using publicly available material. We then conducted a more in-depth analysis of risk by using a score-based method ranging from low risk to high risk within the following categories:





MGM Group is committed to the on-going assessment of suppliers in addressing and eliminating the risks of modern slavery practices within our operations and supply chain network. By mapping out our critical tier one suppliers and categorising their risks according to 4 relevant sectors we are able to identify potential risks and ensure visibility of our own supply chains.

If modern slavery is suspected or identified within any of our suppliers or within their supply chains, MGM Group is committed to working with suppliers to remedy the issue in the first instance using proactive steps to support the supplier's modern slavery risk management approach.

NEW SUPPLIER ASSESSMENT

To ensure that we meet our on-going commitment to eliminating the risk of modern slavery within our operations and supply chain, MGM Group engaged professional legal services to collaboratively develop a questionnaire designed to assist us in assessing modern slavery risks within the procurement stage of new suppliers and within our existing suppliers.

The MGM Group modern slavery questionnaire assesses a supplier's current practices relating to modern slavery, policies, their visibility over their supply chain and the supplier's response to findings of modern slavery practices within their networks.

The engagement of our suppliers and response to the questionnaire were satisfactory and no modern slavery breaches were disclosed or otherwise identified.

TRAINING

MGM Group are committed to providing training, resources and education to all employees responsible for procurement and contracting within the business. We have undertaken a review of our existing policies and procedures to ensure all employees have access to support and development relating to modern slavery.

OUR PLANS FOR THE 2023 FINANCIAL YEAR

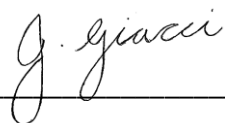
Over the next reporting period, MGM Group will continue to meet our obligations to eliminate the risk of modern slavery within our operations and supply chain network. We have proposed to undertake the following steps over the next 12 months:

- Conducting another supply chain assessment of our current suppliers to assess the risk of modern slavery practices.
- To provide modern slavery education to personnel who have direct influence and/or leadership control over procurement activities and employee wellbeing to ensure that modern slavery practices are understood and able to be reported if identified.

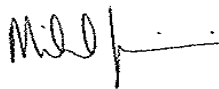
CONSULTATION AND APPROVAL

This modern slavery statement was prepared following a consultation process with professional legal services, HSEQ management and procurement personnel responsible for modern slavery compliance.

This modern slavery statement is approved by the principal governing body of the reporting entity, being the Board of Directors of MGM Bulk Pty Ltd on 1 July 2022.



Signed by Giudi Giacci, a responsible member of the reporting entity, in her capacity as Director of MGM Bulk Pty Ltd



Signed by Michael Giacci, a responsible member of the reporting entity, in his capacity as Director of MGM Bulk Pty Ltd