



NEPEAN

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# Modern Slavery Statement 2021-2022



# ABOUT THIS STATEMENT

This 2022 Modern Slavery Statement has been prepared for the reporting period 1 July 2021 to 30 June 2022.

Modern Slavery continues to be a complex human rights issue and is further aggravated by the nature of cross global supply chains, global economies and inter-dependent work forces. Despite these factions, NEPEAN remains fully committed to providing and adhering to the highest ethical standards of behaviour across all of its areas of operations globally, and throughout its related workplaces.

Modern Slavery must be considered unacceptable in all of its forms and will not be tolerated within NEPEAN'S areas of operations or throughout its Supply Chains. The sanctity of Human Rights, must be protected and preserved and we must all do our part to strive to safeguard the rights of others, free from servitude and oppression and from other forms of abuse.

Miles Fuller  
Sole Director & Secretary

## About NEPEAN

NEPEAN is Australia's leading privately owned engineering, mining services and industrial manufacturing organisation which delivers high value, innovative and sustainable solutions for the world's leading mining, construction and transport companies. NEPEAN employs over 1,400 people across 6 continents and operates in Australia, the USA, Canada, Europe, South Africa, South East Asia, New Zealand and South America.

NEPEAN operates globally through a portfolio of national and international companies by providing specialist manufacturing and supply capabilities to the mining services, building products and engineering sectors.



# STRUCTURE & OPERATIONS

## **Conveyor Systems and Components**

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Our businesses involved with the manufacture and supply of conveyor systems and components operate through our NEPEAN Conveyors, PROK, Gurtec and Roxon entities based in South America, Canada, United States, Indonesia, South Africa, Sweden, Finland and Germany as well as more locally in Mackay, Wollongong, Perth, Pilbara, Gosford and Gulgong.



# Longwall Equipment & Systems

Our mining longwall business operating from Rutherford NSW and MacKay QLD concentrates on the design and construction of underground longwall mining equipment under our NEPEAN Longwall Pty Ltd entity including equipment and systems such as:

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





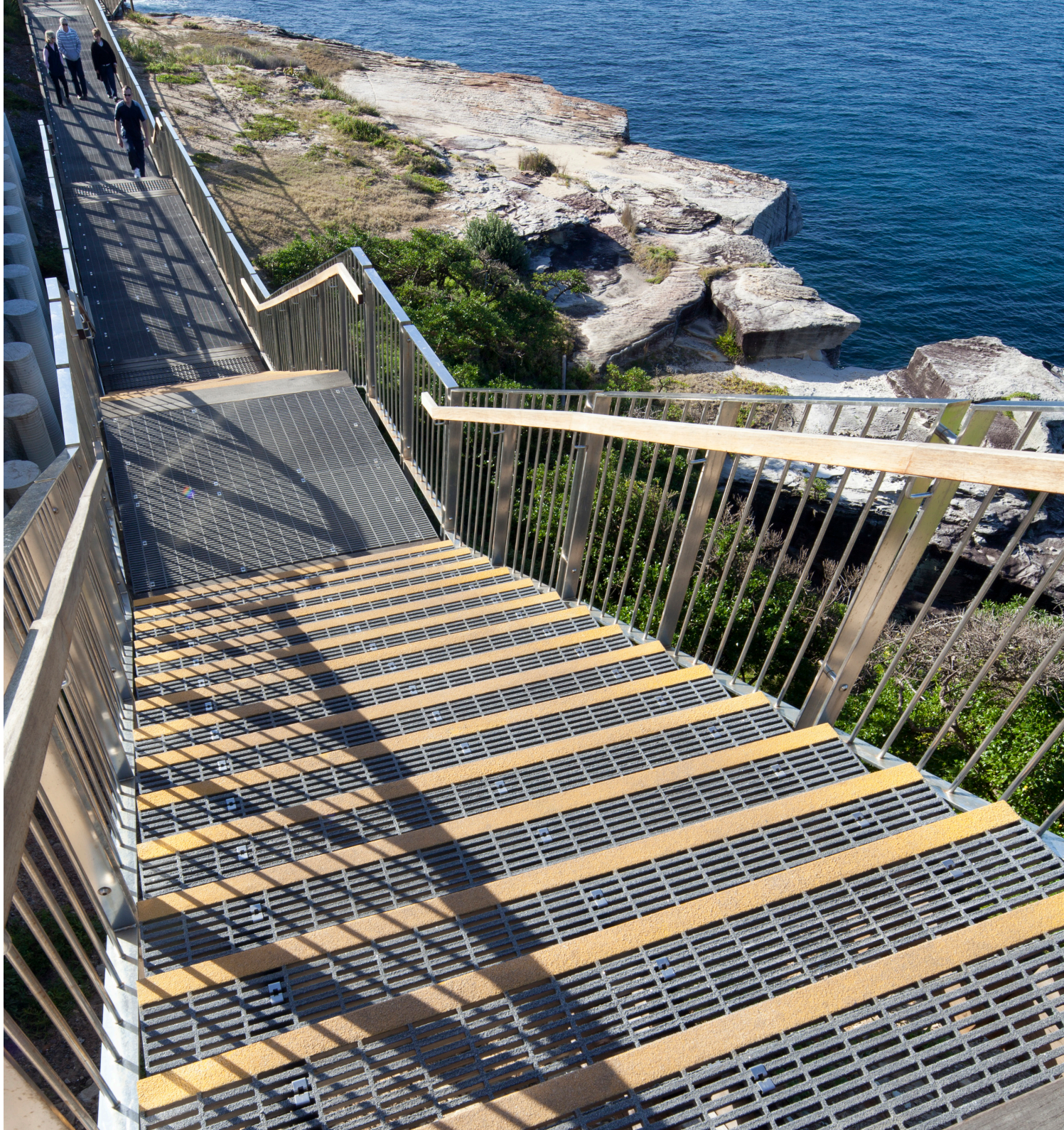
## **Electrical Components and Equipment**

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Our NEPEAN Power Pty Ltd entity operates from Thornton NSW and is focused on the supply and manufacture of:

- Power Supply Devices
- Substations
- Power & Electronic Device Services
- High Voltage Switchgear
- Switchrooms
- Control & Protection Devices
- Distribution Control Boxes; and
- Surface Methane Plant Management Services.





## Building Products and Services

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Our business includes the manufacturing, supply & galvanising of metal products through our entities of Weldlok, Galserv and Galintel for the architectural, civil, construction and industrial markets operating from Yagoona, Coffs Harbour, Mackay, Brisbane, Perth & Melbourne:

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



# Engineering Services

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Our engineering operations undertaken by NEPEAN Engineering & Innovation Pty Ltd provides specialist engineering services to the mining, manufacturing, infrastructure, scientific, defence, aerospace and pharmaceutical sectors from Narellan NSW. These specialties include:

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





# Supply Chain

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Our supply chain across our areas of operation continues to consists 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:

- Belts and related monitoring systems
- 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





# OUR APPROACH

## Human Resources

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NEPEAN has policies in place which promote legal and ethical business conduct. These are regularly reviewed and receive Board approval. All new employees upon induction into procurement roles receive initial and ongoing Modern Slavery awareness training and learn of NEPEAN's policies, guidelines and actions taken by NEPEAN in order to minimise and prevent Modern Slavery from occurring. NEPEAN's existing employees continue to receive Modern Slavery awareness training, which is implemented via shared learning platforms and reinforced by our various General Managers across our different business units.

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.

## Speak Up

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NEPEAN promotes a confidential Speak Up reporting regime and has a dedicated Modern Slavery Complaints Officer, specifically tasked with the investigation of Modern Slavery suspected incidents or occurrences. This is augmented by NEPEAN's Whistleblowing policy.

## Supplier Due Diligence

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Our Commercial, Project & Finance teams 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 implement within their own organisation and supply chains in order to prevent & minimise Modern Slavery .



## Contracting

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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 acknowledge that they have no knowledge of any Modern Slavery offences occurring within their organisation(s) or supply chain(s) and that they will take steps to address any grievances, instances or concerns which may arise throughout the contract and their supply chains generally.

## Risk Assessment

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Across the portfolio, each General Manager across our various business units (which includes our subsidiaries and related entities) reassessed its supplier geographical & contract value based risk identification process - which graded suppliers according to regions based upon the Global Slavery Index Walk Free Foundation Regional Prevalence & Vulnerability Data Index Matrix. Other factors were also taken into account including the sector and type of industry those suppliers operate within.

Adopting this process again enabled us to identify and consider risks that may possibly cause or contribute to modern slavery practices along with the type of industry and type of products and services being supplied. This assessment criteria enabled us to classify our suppliers as being at Minor through to Low, Moderate, High and Extreme Risk. The outcome of the assessment assisted with our prioritisation and implementation of our supplier engagement.

We continue to monitor the overall effectiveness of this assessment based approach against our current adopted processes and procedures in order to identify the 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 assess the effectiveness of our actions in identifying and managing modern slavery risks by engaging and working with our suppliers, undertake internal governance and awareness training and generally tracking and rating our actions. Monitoring these actions requires a system of continuous improvement by which we seek to strengthen and improve our awareness & responsiveness to modern slavery.







## COVID-19

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Despite global economies showing signs of recovery following the Covid-19 outbreak, industry disruption as well as disruption to supply lines generally remains prevalent. The risk and presence of Modern Slavery remains and we all must be vigilant and do our part to continue to build and work with our internal and external relationships whilst maximising the use of modern technology to find enhanced ways of engaging with our customers and suppliers when traditional methods are not always available.

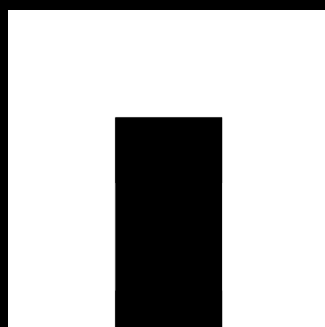
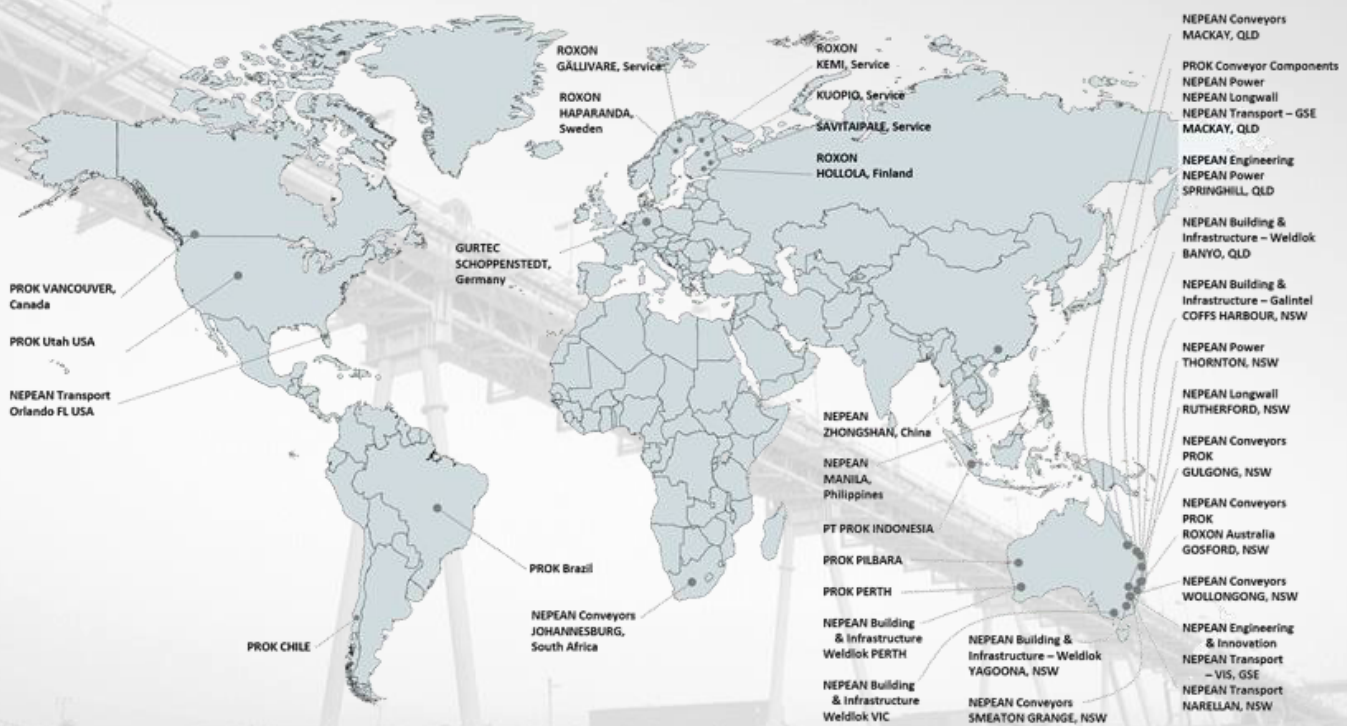
This enables us to build and maintain better relationships whilst at the same time increasing the visibility of our suppliers. Our on-line dedicated learning hub and our internal training & awareness remains at the core of our implementation strategy.



# ONGOING REVIEW

Our response to Covid-19 is on-going and is subject to further review & monitoring. Our Modern Slavery Policy will continue to be reviewed and updated where necessary. 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 together with our remediation protocols and will be amended or updated. Our e-training education is available on line at any time and has been updated to allow access to our employees globally.

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.



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