



# MODERN SLAVERY STATEMENT

Redpath (Australia) Holdings Pty Ltd

ACN 133 126 682

Reporting year ended 31 December 2024 (FY24)

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Safety – First, Last and Always.


## DOCUMENT SUMMARY

Written By	Emma Fairley
Contributors	Craig Howard, Nick Casey

## REVISIONS

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2	1 July 2022	Emma Fairley	Updated to address mandatory criteria for modern slavery statement
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## DOCUMENT APPROVAL

APPROVER NAME	TITLE	SIGNATURE	DATE
Gavin Ramage	As Managing Director and representative for the Redpath (Australia) Holdings Pty Limited Board of directors		12 March 2026

## TABLE OF CONTENTS

1.0	ABOUT REDPATH.....	4
1.1	Our Business .....	4
1.2	Philosophy and Guidelines .....	4
2.0	THE REPORTING ENTITY .....	5
3.0	REDPATH SUPPLY CHAINS .....	5
4.0	MODERN SLAVERY RISKS.....	6
5.0	CONTROLS & ASSESSMENT .....	7
6.0	LOOKING AHEAD .....	7
7.0	APPROVAL BY BOARD .....	8

## 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, Kazakhstan, 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.

During FY24 Redpath acquired RUC Mining Contractors Pty Ltd (ACN 051 252 549)(**RUC**), including all of RUC's subsidiary companies set out in section 2.0. RUC is an underground mining contractor that provides many of the same services as The Redpath Group, and has operations throughout Australia and in Mongolia, Indonesia and Kazakhstan. The acquisition of RUC introduced significant increases in volume of suppliers and procurement spend, and as discussed later in this statement a focus of Redpath in FY24 has been reviewing and aligning procurement practices between the businesses.

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 2024 to 31 December 2024. 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)
- RUC Mining Contractors Pty Limited (ACN 051 252 549)
- Incycle Shotcrete Pty Ltd (ACN 112 241 648)

The following entities not "reporting entities" for the purposes of the Modern Slavery Act 2018 (Cth), however are subsidiaries of the Reporting Entities and their activities are considered for the purposes of this Statement:

- RUCCEM LLC (Mongolia)
- Clough Projects Singapore PTE. LTD (Singapore)
- PT RUC Cementation Indonesia (Indonesia)
- Turan Industrial LLP (Kazakhstan)
- KP Industrial LLP (Kazakhstan)
- GCR Mongolia LLC (Mongolia)

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 FY24 Redpath, including RUC and all subsidiaries, had over 1,600 active suppliers with a total spend exceeding \$300 million dollars (AUD). Most of our suppliers for Australian operations are in Australia, with offshore subsidiaries primarily utilising suppliers in their respective country. 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 FY24 Redpath substantially focused on:

1. reviewing procurement practices and existing supply chains for RUC's Australian business; and
2. integrating RUC's Australian suppliers into Redpath processes.

This process identified both businesses had many similarities in existing supply chains, due diligence processes and exposure to the risks set out in section 4.0. Integration of Australian supply chains and modern slavery practices is expected to be finalised during FY25.

## 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 DISCRPTION
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, particularly for offshore subsidiaries.</li> <li>• Supplier does not have policies and processes to identify, investigate and remedy risk and instances of modern slavery, particularly for offshore subsidiaries.</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 Laws.</li> <li>• 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 risk	<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>

## 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 (excluding RUC and subsidiaries):</p> <ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Modern Slavery Policy</li> <li>• Diversity and Inclusion Policy</li> <li>• Grievance Policy</li> </ul> <p>Key policies for RUC that address human rights and Modern Slavery are: RUC – Supplier Code of Conduct – Modern Slavery</p>	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"> <li>• Conduct due diligence in all new supplier requests in Australia. This process is to be implemented across offshore subsidiaries during FY25.</li> <li>• Continue to ensure suppliers of goods and services to Redpath comply with the Modern Slavery Act 2018 (Cth) and Redpath's related policies.</li> </ul>	Internal Audits to ensure new suppliers are aware of our modern slavery Policy Statement
Reporting	<ul style="list-style-type: none"> <li>• 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.</li> </ul>	Internal Compliance checks to ensure all reports made our investigated

During FY24:

- No suppliers were onboarded by Australian entities unless they sufficiently responded to all due diligence enquiries concerning Modern Slavery; and
- There were no instances of Modern Slavery incidents being recorded via reporting channels.

## 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.

Focus areas for FY25:

1. Finalise integration of Redpath and RUC supply chains;
2. Finalise integration of Redpath's historical Modern Slavery policies and procedures across RUC's Australian entities;
3. Commence integration of Redpath's historical Modern Slavery policies and procedures across RUC's offshore entities; and
4. Trial use of 3<sup>rd</sup> party proprietary software to assess suppliers and supply chain, with a view to further strengthening due diligence in onboarding and direct ongoing audit activities.

## 7.0 APPROVAL BY BOARD

This statement for Redpath (Australia) Holdings Pty Limited and the Reporting Entities noted in Section 2.0 was approved by the board of Redpath (Australia) Holdings Pty Limited as the parent entity on 12 March 2026.



**Gavin Ramage**  
**Managing Director**  
**Redpath (Australia) Holdings Pty Ltd**

**12 March 2026**

# 260312 Redpath - Modern Slavery Statement CY24 (final)

Final Audit Report

2026-03-20

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