

COLUMN DE LE COLUM

BYRNECUT GROUP MODERN SLAVERY STATEMENT FY23

31 October 2024

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### **MODERN SLAVERY GROUP STATEMENT FY23**

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### BYRNECUT

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# **1. BYRNECUT GROUP - OVERVIEW**

### Reporting Criteria #1 – Modern Slavery Group Statement

- This statement is made under the *Modern Slavery Act* 2018 (Cth) for the period ending 31 December 2023.
- This is a joint statement published on behalf of the Byrnecut Group comprised of the following entities:
  - Byrnecut Australia Pty Ltd (including Raising Australia and BOAB)
  - Jetcrete Oz Pty Ltd
  - Murray Engineering Pty Ltd
  - Quattro Project Engineering Pty Ltd
  - Mining Plus Pty Ltd
  - Byrnecut Offshore Pty Ltd
  - Sano Health Pty Ltd
  - Fuze Group Pty Ltd
- The Byrnecut Group operates throughout Australia, North and South America, Africa, Asia and Europe.
- This statement details the steps the Byrnecut Group has taken to assess modern slavery risks within its operations and supply chains, and the actions taken to manage those risks.



## 1. BYRNECUT GROUP – OVERVIEW (cont.)

#### Reporting Criteria #2 – The Byrnecut Group

The Byrnecut Group is one of the largest providers of mining services in Australia and overseas.

Byrnecut Group is headquartered in Perth, Western Australia and has a workforce of 5985 employees.

- Byrnecut Australia Pty Ltd specialises in hard rock underground contract mining.
- Jetcrete Oz Pty Ltd is a shotcreting business providing a complete service for all stages of underground shotcreting, remote shaft lining, concrete manufacture, surface and underground civil infrastructure.
- Raising Australia is a specialist raise drilling company which has a fleet of raise drills for the mechanised development of accurate vertical and subvertical raises.
- Quattro Project Engineering Pty Ltd is a project engineering business providing turnkey solutions for the delivery of surface infrastructure and mining related projects.
- Byrnecut Offshore Pty Ltd specialises in hard rock underground contract mining.
- Mining Plus Pty Ltd is a consultancy business offering expertise in mining engineering, geology and geotechnical engineering.
- Murray Engineering Pty Ltd is an engineering business providing mechanical and electrical goods and services to all areas of industry. It specialises in maintenance, refurbishment, construction and manufacture.
- BOAB (Building Opportunities for Aboriginal Business) is an indigenous training business which increases indigenous training and employment outcomes through commercial engagement.
- Sano Health Pty Ltd offers workplace programs to prevent injury and improve health and wellbeing through positive behaviour change.
- Fuze Group Pty Ltd delivers structural repair and reinforcement solutions that ensure the reliable and continued operation of assets and infrastructure.



### 2. BYRNECUT GROUP – SUPPLY CHAIN ASSESSMENT

### Reporting Criteria #2 - Byrnecut Group – Supply Chain

- The Byrnecut Group's supply chain includes the procurement of goods and services.
- The Byrnecut Group has approximately 3200 suppliers.
- Our supply chains include the following services and products:
  - Equipment and spares
  - Consumables and equipment hire
  - Oils and lubricants
  - Tyres
  - Light vehicles and heavy machinery
  - Site utilities and infrastructure
  - Freight and logistics
  - Explosives
  - Labour hire
  - Corporate services
- The majority of the Byrnecut Group's suppliers are located in Australia.
- The Byrnecut Group recognises that its suppliers may source products from outside Australia, which has the potential to present modern slavery risks.

# 2. BYRNECUT GROUP – SUPPLY CHAIN ASSESSMENT (cont.)

#### Reporting Criteria #3 – Describe the risks of modern slavery practices in operations and supply chain

#### Modern slavery risks

- The Byrnecut Group has carried out a Group-wide identification of its modern slavery risks in its operations and supply chain.
- The process followed involved consideration of:
  - Group company policies, procedures and compliance
  - Supply chain processes, compliance and supply contract terms

#### Supply chain risk assessment process

• The Group purchase order terms are reviewed regularly to ensure compliance with Modern Slavery requirements. Each new supplier, as well as existing suppliers, is contractually bound by modern slavery compliance requirements included in the purchase order terms.

#### Key risks

Following the risk assessment process, the key risks identified for the Byrnecut Group include:

- Supply chain management risks
- Supply chain goods risk
- Offshore employee and supply chain labour risks

# 2. BYRNECUT GROUP – SUPPLY CHAIN ASSESSMENT (cont.)

#### Reporting Criteria #4 – Describe the actions taken to address risks

#### Governance:

- Our key policies that address human rights and modern slavery include:
  - Code of Conduct
  - Whistleblowers' Policy
  - Modern Slavery Policy
  - Diversity and Inclusion Policy
  - Grievance Procedure
  - Parental Leave Guidelines
  - Labour Practices Policy
  - Bullying, Sexual Harassment & Discrimination Policy

### Supplier Pre-qualification:

• Our supplier pre-qualification assessment process involves confirmation of compliance requirements (insurance and certifications)

#### Supplier Engagement:

- Our approach includes:
  - Contractual Obligations: our purchase order terms require modern slavery reporting and compliance
  - Ongoing Monitoring: continuously monitoring supplier practices and addressing any concerns promptly

#### Risk Assessments:

• The Group undertakes assessment of our operations and supply chains to identify potential vulnerabilities.

# **3. BYRNECUT GROUP – FUTURE ACTIONS**

### Reporting Criteria #5 – Address the effectiveness of future actions

### Group Goal

The Byrnecut Group's goal is to maintain responsible and transparent supply chains.

We increased governance across the following areas:

### Group

• Increase knowledge and awareness of modern slavery risks in operations and supply chains.

#### **Suppliers**

- Conduct audits of our Tier-1 suppliers.
- Continuously assess supplier governance (compliance with procedures and policies) within the Byrnecut Group tender and supplier creation process.
- Require suppliers to submit modern slavery policies and procedures as part of their tender submissions for tender evaluation process.

#### Clients

- On-going compliance with client requests to complete detailed modern slavery questionnaires.
- Regularly review client site policies, procedures and contract terms.

### **4. BYRNECUT GROUP – SUBSIDIARIES**

Reporting Criteria #6 – Describe how reporting entity consulted on its Statement with subsidiary entities

- The assessment of modern slavery risks involved engagement across the Byrnecut Group with key stakeholders and executive management.
- Each reporting entity within the Byrnecut Group was consulted and provided feedback in relation to this Statement.

### **5. EXECUTIVE APPROVAL**

The Byrnecut Group Modern Slavery Statement was approved by the board of Byrnecut Australia Pty Ltd on behalf of the Byrnecut Group entities on 31 October 2024.

Signed: STEVE COUGHLAN Executive Chairman

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