

One Key Group Modern Slavery Statement

Reporting Year Ended 31 August 2022

1. Reporting Entities

Pursuant to the Modern Slavery Act 2018 (the Act), this modern slavery statement is put together on behalf of One Key Holdings Pty Ltd ACN 150 149 643 (OKH) and its subsidiaries and associated entities which are reporting entities under the Act, as set out below:

- One Key Resources Pty Ltd ACN 141 650 259
- FES Coal Pty Ltd ACN 626 773 911
- OKR Technical Services (Australia) Pty Ltd ACN 612 348 222

(together the One Key Group).

This is a joint statement by each of the reporting entities under the Act for the financial year ending 31 August 2022.

This modern slavery statement is prepared in accordance with the Act and describes the risks of modern slavery in the One Key Group, the steps we have taken in the financial year ending 31 August 2022 and up to the date of this statement to identify, manage and mitigate the risks in our operations and supply chain.

The One Key Group is committed to actively tackling the risk of modern slavery throughout our supply chain. We hold integrity as a central, core value of the One Key business and we strive to act ethically and transparently throughout all our business dealings.

References to One Key, One Key Group, 'we', 'us' and 'our' collectively refers to One Key Group and each of its reporting entities covered by the statement.

2. Structure, Operations, and Supply Chains

STRUCTURE

OKH is an Australian proprietary company that was established in 2011 and is headquartered in Brisbane, Queensland. The registered head office of the One Key Group is Level 15, 324 Queen Street, Brisbane, 4000, QLD. The One Key Group trades under the name One Key Resources.

OKH is wholly owned by OKR Technical Services (Australia) Pty Ltd. There are a total of 10 entities within the One Key Group.

As of the date of this statement, the One Key Group currently has approximately 40 internal employees.

OPERATIONS

The One Key Group is a leading labour hire and managed workforce services provider to the open cut and underground mining industry nationally. One Key's experience and services covers all areas of mining across all commodities.

One Key specialises in supplying and managing large scale workforces whilst maintaining a firm focus on productivity and performance. We are committed to providing the highest levels of employee and client satisfaction.

Our business is based in Brisbane with regional offices in Perth, Singleton and Mudgee servicing the key

resources areas of Australia and providing a base for us to service major regional civil infrastructure projects.

As of the date of this statement, One Key currently has approximately 1000 labour hire employees across Australia. Labour hire employees are employed by a number of entities across the One Key Group depending on factors including the location of the mine site where the employee is based and the specific type of mining the employee is involved in. The employee's employment may be governed by an industrial award or enterprise agreement.

In the last financial year, One Key has provided meaningful contributions to the Australian employment market through:

- The employment of over 972 new employees;
- The implementation of an apprenticeship initiative;
- Senior management level involvement in an industry taskforce to combat sexual harassment in the workplace;
- Providing entry channels to the industry through New to Industry campaigns and Traineeships nationally;
- Increasing our diversity among active client sites, with an increased focus on rehabilitation works in the mining sector; as well as emerging renewable resources projects in regional and remote locations;
- Increasing representation of diversity groups across the workforce, which continues to grow and will remain an ongoing focus;
- Supporting local employment in regional areas in the first instance;
- Supporting the communities we work within through employment but also through local procurement and associated community investment; and
- Supporting a wide variety of sporting, charity and community initiatives.

SUPPLY CHAINS

As the One Key Group is a labour hire provider, we have a very limited number of direct suppliers. Our supply chains include the procurement of the following goods and services:

Goods

- Personal protective equipment
- IT equipment
- Promotional materials such as branded pens and bags
- Office stationery
- Office refreshments such as milk, tea and coffee
- Vehicles for internal staff use
- Software

Services:

- Banking services from Australian banks
- Accounting and legal services from professional services firms
- IT support services
- Medical providers
- Training providers
- Travel providers
- Cleaning services

3. Modern Slavery Risks in Operations and Supply Chains

Approximately 90% of revenue generated by the One Key Group in the financial year ending 31 August 2022 ultimately passed through to internal and labour hire employees as wages and entitlements. Our operations are based solely in Australia and as such we have a limited direct supply chain. We therefore consider that the risk of modern slavery in our supply chain is very low.

Additional factors which we consider lower the risk of modern slavery in our business include the following:

- One Key conducts regular audits of our clients, including onsite in-person visits to the worksites of our employees. We are therefore very confident that the working conditions of all of our labour hire and internal employees are well above standards that would constitute modern slavery;
- Given the specialised nature of the industries we work in, the majority of our workforce are remunerated well in excess of any minimum entitlements required by law;
- We have in place best practice policies and procedures in relation to the recruitment and onboarding of employees within our business, which all staff are required to comply with;
- Regular internal payroll audits and yearly rate reviews are carried out across the business; and
- One Key actively contacts its employees seeking feedback periodically during their employment to allow any concerns to be easily raised and addressed.

Whilst we consider the risk of modern slavery in our business to be low, we appreciate there may still be risks in our supply chain and consider the following to be potential risk areas:

I. PROCUREMENT OF GOODS

- Personal protective equipment which is manufactured overseas
- IT equipment
- Promotional materials such as branded pens and bags
- Office stationery

The goods listed above would normally be sourced from local Australian companies; however, the goods may have been manufactured in countries listed in the Global Slavery Index. The risk varies depending on the country and the product type.

II. PROCUREMENT OF SERVICES

- Cleaning services
- Overseas IT services

As a sector, cleaning is considered high-risk for modern slavery and exploitation due to the complexity of the industry and the nature of the workforce. There is a risk that overseas IT services may be provided by companies who engage employees located in countries listed in the Global Slavery Index.

4. The One Key Group's Actions

POLICIES AND PROCEDURES

The One Key Group monitored modern slavery risks within its direct supply chain and operations, during the relevant reporting period and up to the date of this statement via adherence to its internal policies. One Key also has a specific Modern Slavery Policy.

A central risk register for the One Key Group was put together this year by senior management, to ensure greater awareness of business wide risks and to facilitate the introduction and management of mitigation measures. One Key has established a committee to periodically review risks, including Modern Slavery risks, and to assess the sufficiency of the relevant controls in place.

This year, we have also introduced Modern Slavery guidance in our employee induction handbook and the One Key Modern Slavery Policy was made a mandatory read for all internal staff. Employees are actively encouraged to immediately raise any concerns either directly with their manager, or if preferred via the One Key Whistleblower portal which is accessibly anonymously via the One Key website.

One Key's compliance policies are reviewed annually, to ensure these are up to date with current and relevant legislation and that these remain fit for purpose, these include One Key's Whistle-blower Policy, Privacy Policy, Anti-Bribery and Corruption Policy and all company HR policy documents.

One Key's Whistle-blower Policy allows all individuals covered by the policy to make a report of modern slavery concerns (or other concerns) via the One Key website, making reporting easy and confidential.

One Key is committed to promoting a culture of openness and accountability, which is essential in order to preventing modern slavery or human trafficking.

STRENGTHENING CONTRACTUAL OBLIGATIONS WITH SUPPLIERS

During the reporting period, One Key has continued to ensure:

- i. All One Key terms of business include an obligation to comply with the Act. Specifically, customers and clients are required to:
 - Have in place adequate procedures and policies to prevent and address involvement in modern slavery in accordance with the Act and in line with recognised international standards including the UN Guiding Principles on Business and Human Rights; and
 - Report to One Key Group if a customer or client becomes convicted of any offence concerning modern slavery, or is subject to an investigation, enquiry or enforcement proceedings in connection with modern slavery.
- ii. One Key's internal commercial risk standards are adhered to, which include an obligation to ensure each new contractual arrangement entered into by One Key contains undertakings by its clients to comply with the Act.

TRANSPARENCY

As part of our commitment to promoting ethical practices and preventing modern slavery in its operations and supply chains, we maintain full transparency with our clients as to our modern slavery compliance measures. This year, we have worked closely with a number of key clients to demonstrate One Key's actions, and future intentions to combat modern slavery risks. We are encouraged by the engagement of our clients on Modern Slavery which indicates that throughout our supply chain, Modern Slavery concerns are being actively managed.

EMPLOYMENT VERIFICATION

During the reporting period, we have continued to ensure all employees have the necessary work rights, by ensuring a process is followed to check and validate all employee visas and that those employees are being paid fairly. Regular internal payroll audits and yearly rate reviews are carried out across the business as well an annual financial audit which is carried out by our appointed external auditors.

ONGOING INTENTIONS

One Key is continuing to implement the following controls:

- This year One Key has strengthened its training processes for new employees, including the introduction of a mandatory discrimination and harassment training video. We plan on expanding this training to also cover ABC and modern slavery over the coming year.
- The roll out of a supplier questionnaire to new clients or suppliers who have links to a higher risk industry or a country with a high-ranking modern slavery prevalence, designed to give One Key the opportunity to assess their supply chain and potential modern slavery risks before agreeing to purchase goods or supply services.
- One Key is committed to reviewing the modern slavery statements of its key clients, once lodged, to maintain an overview of the modern slavery practices which are ongoing in One Key's wider supply chain.
- One Key intends to continue to raise the profile of modern slavery in the business and ensure staff are able to recognise and raise concerns when necessary.
- One Key further intends to continue to review all current suppliers. We intend to take a proactive approach with our suppliers and where possible adopt a collaborative approach to mitigate risks to identify modern slavery and anti-corruption risks across our supply chain.

- One Key will continue to develop the group wide risk register.

5. Analysis and Continuous Improvement

One Key recognises that it can continue to improve in the monitoring and management of modern slavery risks. We intend to assess the effectiveness of our actions moving forward by:

- Conducting annual senior management reviews of the One Key Group’s response to modern slavery.
- Ensuring the One Key Group’s processes and procedures in relation to modern slavery are raised on an annual basis at a meeting of the directors for discussion.
- Once the supplier risk assessment process is rolled out to the business, routinely reviewing the suitability of the assessments to ensure these remain up to date.
- Conducting an annual review of our key client’s modern slavery statements.

6. Consultation


One Key has actively engaged with all members of the One Key group and its senior leadership team, including the Board of Directors of each reporting entity in the development of this statement. Directors of each entity of the Group were involved in the consultation process to develop this statement and have had the opportunity to review this statement and provide feedback.

7. Future Outlook

The One Key Group will continue to monitor and develop its systems and processes with a view to combating modern slavery risks.

8. Approval

This Modern Slavery Statement was unanimously approved by the Board of Directors (which is the principal governing body) of each of the following reporting entities: One Key Holdings Pty Ltd, One Key Resources Pty Ltd, FES Coal Pty Ltd and OKR Technical Services (Australia) Pty Ltd, on **23 February 2023**.

Approval	
Approval By:	<p>Ben Lewis, Managing Director of the One Key Group and Board Director of:</p> <ul style="list-style-type: none"> • One Key Resources Pty Ltd ACN 141 650 259 • FES Coal Pty Ltd ACN 626 773 911 • OKR Technical Services (Australia) Pty Ltd ACN 612 348 222 • One Key Holdings Pty Ltd ACN 150 149 643
Signature of Ben Lewis, Board Director & Managing Director:	
Approval Date:	23 February 2023