







# 1. OUR COMMITMENT, VALUES AND APPROACH

is committed to being socially responsible in all our operations and throughout our supply chain. We recognize the importance of human rights and oppose slavery in all its forms. It is fundamental to our core values of "Listen" and "Recognise" that all people in our business and associated with our business are treated fairly and with respect.

Our goal is to maintain a socially responsible and transparent supply chain, and we are committed to conducting business in an ethical and respectful manner as underpinned by our organizational values.

Our Code of Ethics Policy commits all employees and those we work with, to not use forced, compulsory or child labour. The Policy further commits us to uphold fundamental Human Rights by conducting ourselves and the business in accordance with relevant human rights laws and regulations.

Our Grievances and Disputes policy allows participants, both direct work force and contractors, to bring workplace grievances to a resolution through a confidential and fair process.



WE COMMIT TO OUR KEY SAFETY BEHAVIOURS, LIVING OUR VALUES & BUILDING OUR SAFETY CULTURE

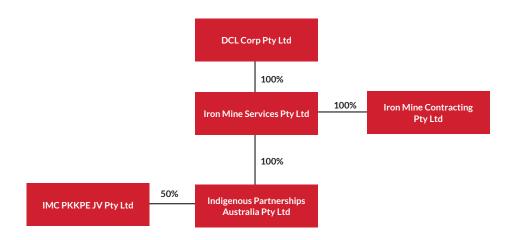
Our statement for the Financial Year ended 30 June 2023 ('FY23') is made in accordance with the Australian Modern Slavery Act 2018 and this represents our ongoing compliance to the reporting requirements and demonstrable commitment to continuous improvement within our organization and across our supply chain since our first statement submitted for Financial Year ended 30 June 2021.

This Statement has been submitted to the Australian Border Force and is structured in line with the Modern Slavery Act reporting criteria.

# 2. OUR COMPANY STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Our combined statement is made in accordance with the Australian Modern Slavery Act 2018 and applies to all entities in the Iron Mine Contracting Group.

The corporate structure is outlined below and this combined statement covers all named entities. For the purposes of reference across this statement, we will refer to the whole group, including DCL Corp Pty Ltd (our Ultimate Parent Entity) as **Iron Mine Contracting Group.** 



**Iron Mine Contracting Group** was formed to provide Civil, Mining, Crushing and Screening and Indigenous partnering opportunities to the West Australian market. We and our indigenous Joint Venture partners have been delivering projects to Tier 1 Resource clients since 2013.

Our client operations we support are typically are present in gold, iron ore, lithium and oil & gas sectors.



We are headquartered in Bayswater, Western Australia and employ over 400 people across project and workshop operations in Western Australia.

Our supply chain spans across over 600 suppliers, all of whom are Australian entities, and consists of goods and services supplied for the purpose of supporting business operations across our core activities.

Our primary areas of expenditure and engagement of suppliers is through equipment hire, materials and external subcontractors and this has not materially changed since our first statement submitted in Financial Year ended 30 June 2021, the profile of our supply chain composition has not materially changed.

#### 3. RISKS OF MODERN SLAVERY

Holistically, our risk profile we believe is still low and has not materially changed since our previous reporting submissions as a result of the composition of our supply chain and improvement in systemized improvements and reporting to monitor our risks.

A further breakdown of our risk commentary is provided as follows:

#### **Labour Workforce**

We believe that there is low risk of modern slavery in across our work force. Our direct workforce is employed directly by in accordance with Australian laws, applicable modern awards, and enterprise agreements. External workforce is engaged indirectly through labour hire and contract service providers where we requires that labour hire providers meet all applicable laws.

#### **Other Supply**

We continue to monitor Modern Slavery compliance through our Contractor Management system, MYOSH.

All our suppliers are Australian entities and as such, our direct exposure to overseas supply chains is not as prevalent, although we do recognize indirectly, supply chains for our suppliers can extend for sources of supply internationally.

No modern slavery breaches in our operations were reported in FY23.

## 4. OUR ACTIONS TO ASSESS AND ADDRESS RISKS

In FY23 we undertook the following key actions and initiatives:

#### **Systems and Reporting Improvement**

Our MYOSH Contractor Management systems underwent a significant upgrade, enhancing our reporting functionality and mobility access for improved use and engagement across our workforce and suppliers.

#### **Supply Review and Rationalisation**

Our Procurement team completed a review of all suppliers on our system and rationalized over 150 suppliers as part of this broader review. Indirectly, through this review, the reduction in suppliers reduces our supply chain risk exposure.

#### **Contracting Terms and Conditions**

We have incorporated in our supply tendering documents, a Modern Slavery Questionairre and also incorporated additional contract terms to support Modern Slavery legislation compliance in our Goods & Services Agreement.

### 5. ASSESSING EFFECTIVENESS OF OUR ACTIONS

Our actions and effectiveness for FY23 have been continuously monitored and reviewed by the Procurement function. Deficiencies or improvements are addressed as they arise and opportunities for continuous improvement are identified.

No modern slavery breaches in our operations were reported in FY23.

### 6. OUR CONSULTATION

Company representatives were consulted in the development of this statement to ascertain the modern slavery risk in the supply chain, and to ensure that information provided is true and correct

# 7. OUR FUTURE FOCUS

Iron Mine Contracting Group are committed to a continual improvement plan in assessing modern slavery risk and mitigation. Our objective is to eliminate risk in our supply chain and identify and breaches or non-compliance in a timely manner.

## 8. OUR STATEMENT APPROVAL

This Statement is made on behalf of the Iron Mine Contracting Group for the Financial Year ending 30 June 2023 and it has been approved by our governing body, the Board of Directors.

**Clinton Keenan** 

Chief Executive Officer

(Signing as authorized Responsible Member)