

BYRNECUT

BYRNECUT GROUP MODERN SLAVERY STATEMENT FY25

June 2026



MODERN SLAVERY GROUP STATEMENT FY25

	Page
1. Byrne cut Group Overview	
Reporting Criteria #1 - Modern Slavery Group Statement	1
Reporting Criteria #2 - The Byrne cut Group	2
2. Byrne cut Group – Supply Chain Assessment	
Reporting Criteria #2 - Byrne cut Group – Supply Chain	3
Reporting Criteria #3 – Describe modern slavery risks	4
Reporting Criteria #3 – Supply chain risk assessment process	4
Reporting Criteria #3 – Describe the risks of modern slavery practices in operations and supply chain	4
Reporting Criteria #4 – Describe the actions taken to address risks including impact of COVID-19	5
3. Byrne cut Group – Future Actions	
Reporting Criteria #5 – Address the effectiveness of future actions	6
4. Byrne cut Group – Subsidiaries	
Reporting Criteria #6 – Describe how reporting entity consulted on its Statement with subsidiary entities	7
5. Executive Approval	8



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 2025.
- 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 contract mining services in Australia and overseas.

Byrnecut Group is headquartered in Perth, Western Australia and has a workforce of approximately 7,300 employees.

- **Byrnecut** specialises in hard rock underground contract mining.
- **Jetcrete** 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 sub-vertical raises.
- **Quattro Project Engineering** is a project engineering business providing turnkey solutions for the delivery of surface infrastructure and mining related projects.
- **Byrnecut Offshore** specialises in hard rock underground contract mining.
- **Mining Plus** is a consultancy business offering expertise in mining engineering, geology and geotechnical engineering.
- **Murray Engineering** 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** offers workplace programs to prevent injury and improve health and wellbeing through positive behaviour change.
- **FUZE** 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 - Byrncut Group – Supply Chain

- The Byrncut Group supply chain includes the procurement of goods and services.
- The Byrncut Group has approximately 3,558 suppliers.
- Our supply chains include the following services and products:
 - Heavy mobile equipment parts and accessories
 - Equipment Rebuilds and Rental
 - Lubricant Global supply Network
 - Compliance and Training
 - Labour hire
 - Mining consumables
 - Ground support
 - Drilling consumables
 - Explosives
 - Hydraulic cylinders hoses and fittings
 - Freight
 - Concrete aggregate and admixture
 - Accounting & audit
 - Tyres and tyre chains
- The Byrncut Group recognises that its suppliers source products from outside Australia, which has the potential to present modern slavery risks.
- Based on analysis of the top 10 categories of services and products supplied to Byrncut, it is likely that a fair proportion of products are manufactured offshore. Having more oversight of location of manufacture been raised as a topic for future action.

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 Byrncut 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.
- All existing and all new suppliers are contractually bound by modern slavery compliance requirements when they are signed on to the Group purchase order terms.
- Approximately 12–16% of the Byrncut Group's labour hire spend relates to suppliers located outside Australia, including Africa, Canada and other jurisdictions. These regions may present elevated modern slavery risks depending on local labour practices.

Key risks

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

- Supply chain management risks
- Supply chain goods risk
- Offshore employee and supply chain labour risks
- Lubricant logistic disruptions
- Data limitations risk
- Labour hire geographic risk
- Effective management of the risks of imported plant in the work place in accordance with Codes of Practice

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:

- Byrncut Group requires suppliers to submit modern slavery policies and procedures as part of their tender submissions for the tender evaluation process.
- A formalised supplier onboarding pre-qualification process consistently applied across all suppliers is being developed including exploring a new source-to-contract/source-to-pay system, which is expected to introduce:
 - risk-based supplier onboarding (decision-tree assessments);
 - integration with third-party risk and compliance data providers; and
 - certification and compliance tracking.

Supplier Engagement:

- Contractual Obligations: our purchase order terms and contracts require modern slavery reporting and compliance.

3. BYRNECUT GROUP – FUTURE ACTIONS

Reporting Criteria #5 – Address the effectiveness of future actions

Group Goal

The Byrncut 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 and exposure in operations and supply chains.
- Manages strategic suppliers via contracts which follow our contract management framework for monitoring performance over the life of the contract term.

Suppliers

- Conduct audits of our Tier-1 suppliers.
- Continuously assess supplier governance (compliance with procedures and policies) within the Byrncut Group tender and supplier creation process.
- Develop a formalised supplier onboarding pre-qualification process to be consistently applied across all suppliers including exploring a new source-to-contract or source-to-pay software provider including the provision of risk compliance and certification tracking links to third party verification sources as part of supplier onboarding.

Clients

- On-going compliance with client requests to complete detailed modern slavery questionnaires annually through the new source-to-contract or source-to-pay software to be implemented.
- Regularly review client site policies, procedures and contract terms.

3. BYRNECUT GROUP – FUTURE ACTIONS

Reporting Criteria #5 – Address the effectiveness of future actions (Cont'd)

What we learned this year

During the reporting period, Byrncut identified several areas for improvement in its modern slavery risk management framework, including:

- limited visibility of supplier country of manufacture data;
- inconsistent capture of supplier location data within ERP systems;
- lack of centralised tracking of supplier acceptance of standard terms and conditions; and
- reliance on manual escalation processes for supplier risk issues.

What we are doing about it

Byrncut is undertaking a transformation of its procurement and risk systems, including:

- formalised supplier onboarding process and exploring the implementation of a new centralised source-to-contract/source-to-pay platform;
- improvement of supplier master data (including country and address fields); and
- introduction of structured supplier risk screening and evaluation at onboarding.

3. BYRNECUT GROUP – FUTURE ACTIONS

Reporting Criteria #5 – Address the effectiveness of future actions (Cont'd)

Supply Chain Data and System Capability

Byrncut continues to develop its data capability to support modern slavery risk management.

Current limitations include:

- absence of structured country-of-manufacture data;
- inconsistent supplier address data capture; and
- limited reporting on supplier contractual alignment.

The implementation of a formalised procurement system is expected to significantly enhance data accuracy, reporting capability, and risk visibility.

These initiatives are expected to significantly improve visibility and management of modern slavery risks across the supply chain.

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 Byrnegut Group with key stakeholders and executive management.
- Each reporting entity within the Byrnegut Group was consulted and provided feedback in relation to this Statement.



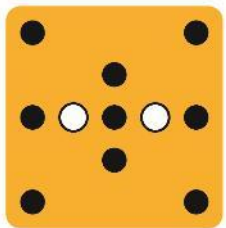
5. EXECUTIVE APPROVAL

The Byrnecut Group Modern Slavery Statement was approved by the Board of Byrnecut Australia Pty Ltd on behalf of the Byrnecut Group entities on 30 June 2026.

A handwritten signature in black ink, appearing to read 'Steve Coughlan', with a stylized, cursive script.

Signed: STEVE COUGHLAN

Executive Chairman – Byrnecut Group



BYRNECUT

A CUT ABOVE™ in contract mining

Byrnegut
Level 2 Bravo Building
1 George Wiencke Drive, Perth Airport WA 6105
PO Box 205 Cloverdale WA 6985
P: 08 9270 1000

