

MODERN SLAVERY

MGM BULK PTY LTD

STATEMENT

FINANCIAL YEAR 22 / 23

FROM FINANCIAL YEAR 2022 TO FINANCIAL YEAR 2023

MGM BULK IS PROUD TO PRESENT OUR MODERN SLAVERY STATEMENT

MGM BULK IS PROUD TO PRESENT OUR MODERN SLAVERY STATEMENT



MGMBULK

CONTENTS

Section 1 . 0	STATEMENT BY DIRECTORS	3
Section 2 . 0	OUR HISTORY & STRUCTURE	3
Section 3 . 0	OUR SUPPLY CHAIN	3
Section 4 . 0	OUR RISK ASSESSMENT OF MODERN SLAVERY PRACTICES	4
Section 4 . 1	SUPPLY CHAIN ASSESSMENT	4
Section 4 . 2	RISKS OF MODERN SLAVERY	5
Section 4 . 3	SUPPLIER ASSESSMENT	5
Section 4 . 4	TRAINING	5
Section 5 . 0	ACTION PLANS	6
Section 5 . 1	PRIOR REPORTING PERIOD – FINANCIAL YEAR 2022-2023	6
Section 5 . 1 . 1	EFFECTIVENESS OF REPORTED ACTIONS	6
Section 5 . 2	PLANS FOR FINANCIAL YEAR 2023-2024	7
Section 6 . 0	CONSULTATION AND APPROVAL	7

➤ STATEMENT BY DIRECTORS

Section 1 . 0

MGM Bulk Pty Ltd ACN 165 448 920, registered office AMD Level 1, 53 Victoria Street, Bunbury WA 6230 ('MGM Group'), recognises that we have an on-going obligation to identify, prevent and manage the risk of modern slavery and slavery-like practices within our business's operations and supply chain network.

Modern slavery including eight types of serious exploitation: human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and child labour, will not be condoned by MGM Group. Modern Slavery practices and those individuals or organisations that enable Modern Slavery to exist, are not aligned with the MGM Group values of "Honesty, Integrity and Excellence".

MGM Group is committed to playing our role in eliminating the risk of modern slavery in our operations and supply chain network and therefore we will continue to assess our practices and those within our supply chain to submit annually our modern slavery statement.

This statement has been published for the 2023 Financial Year in accordance with the requirements of the Modern Slavery Act 2018 ('the Act') and sets out the steps taken by MGM Group for the reporting period.

➤ OUR HISTORY & STRUCTURE

Section 2 . 0

MGM Group was founded in 2004 by Mario Giacci together with his daughter Giuditta (Giudi) and son Michael.

MGM Group has 60 years of experience within the bulk haulage industry, servicing mining companies that require bulk haulage, storage, warehouse management, ship loading, rail loading and stockpile management services. We are a national Australia wide business, however a significant amount of our services is provided to mining clients all over Western Australia.

In 2014, MGM Group added a bulk division to its operations, known as MGM Bulk. MGM Bulk operates in Western Australia within various regions across the state including, Bunbury (head office location), Picton, Perth, Geraldton, and Port Hedland.

MGM Bulk has a workforce in excess of 500 employees and over 657 suppliers including local, national, and international suppliers.

MGM Bulk's first reporting period was FY 2021-2022.

MGM Bulk acknowledges that it is required to submit its modern slavery statement within six months from the end of each reporting period.

➤ OUR SUPPLY CHAIN

Section 3 . 0

In the 2022 - 2023 financial year period, MGM Bulk's supply chain has grown to over 657 suppliers that includes local, national, and international suppliers who provide a range of multi-layered goods and services through various industries. Of those suppliers, the major sectors industries in which they operate include:

- Mining, exploration and development.
- Accommodation providers
- Tyre supply and services providers
- Information Technology and Technology Support
- Road transport equipment manufacturing and servicing
- Fuel, petroleum products and consumables for power stations and gas infrastructure
- Freight and transportation services

During the reporting period, MGM Bulk have identified 16 tier one suppliers (also referred to as Critical Suppliers) and they were assessed based on how critical their services are to the operations of MGM Bulk, their scale, volume and value of services. Of the 16 tier one suppliers, 10 are 'reporting entities' under the Act and have published modern slavery statements.

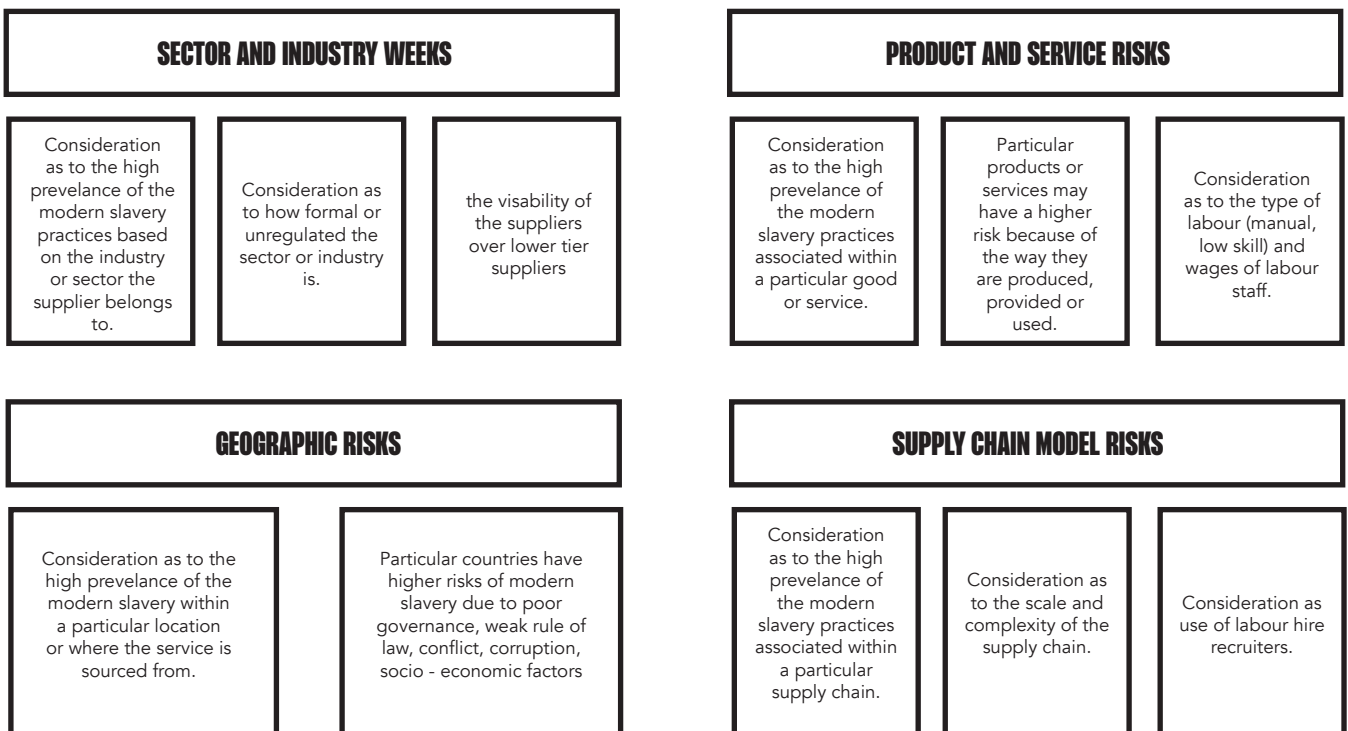
➤ **OUR RISK ASSESSMENT OF MODERN SLAVERY PRACTICES**

Section 4 . 0

➤ **SUPPLY CHAIN ASSESSMENT**

Section 4 . 1

To assess the risk of modern slavery within our supply chains, we have undertaken a high-level analysis of our tier one suppliers (Critical Suppliers) using publicly available material and the responses to our Modern Slavery Questionnaires. The following risk categories were also considered while assessing our tier one supplier's risk profiles:



MGM Bulk is committed to the on-going assessment of suppliers in addressing and eliminating the risks of modern slavery practices within our operations and supply chain network. By mapping out our critical tier one suppliers we are able to identify potential risks and ensure the visibility of our own supply chains.

If modern slavery is suspected or identified within any of our suppliers or within their supply chains, MGM Bulk is committed to working with suppliers to remedy the issue in the first instance using proactive steps to support the supplier's modern slavery risk management approach.

OUR RISK ASSESSMENT OF MODERN SLAVERY PRACTICES

Section 4 . 2

MGM Bulk have not identified any instances of modern slavery within our operations or supply chain. Although we have not yet identified any instances of modern slavery within our operations or supply chains, there have been two areas identified for potential occurrences:

1. Employee relations
2. Supplier Management

Through our internal risk assessment, MGM have identified that these two areas are currently well managed with our existing controls that we are regularly reviewing.

SUPPLIER ASSESSMENT

Section 4 . 3

To ensure that we meet our on-going commitment to eliminating the risk of modern slavery within our operations and supply chain, MGM Bulk engaged legal services to collaboratively develop a questionnaire designed to assist us in assessing modern slavery risks within our existing suppliers.

The MGM Bulk modern slavery questionnaire assesses a supplier's current practices relating to modern slavery, policies, their visibility over their supply chain and the supplier's response to findings of modern slavery practices within their networks.

The engagement of our suppliers and response to the questionnaire were satisfactory and no modern slavery breaches were disclosed or otherwise identified.

TRAINING

Section 4 . 4

MGM Bulk are committed to providing training, resources, and education to all employees responsible for procurement and contracting within the business. We have undertaken a review of our existing policies and procedures to ensure all employees have access to support and development relating to modern slavery.

MGM Bulk have developed specific Modern Slavery training for all personnel that have the authority to purchase goods or services from Suppliers. We have identified that the employees who have the authority to purchase goods or services from suppliers on behalf of MGM Bulk, must be educated in Modern Slavery, to ensure they can raise any concerns with suppliers prior to engaging them.

➤ ACTION PLANS

Section 5 . 0

➤ REPORTING PERIOD – FINANCIAL YEAR 2022–2023

Section 5 . 1

Last reporting period, MGM Bulk was committed to meeting our obligations to understand and eliminate the risk of modern slavery within our operations and supply chain network.

The two key commitments MGM Bulk made for the FY 22-23, were:

1. Conducting another supply chain assessment of tier one suppliers to assess the risk of modern slavery practices.
 - √ Tier one suppliers were issued with the MGM Bulk Modern Slavery questionnaire for the reporting period.
 - √ 16 out of 16 tier one suppliers either responded in full to the questionnaire, or alternatively were able to provide reliable evidence of their internal commitments to combat Modern Slavery.

2. Providing modern slavery education to personnel who have direct influence and/or leadership control over procurement activities and employee wellbeing to ensure that modern slavery practices are understood and able to be reported if identified.
 - √ The MGM Executive Team and all MGM Staff who are involved in the procurement of goods or services, and employee wellbeing, have participated in this training package.

➤ EFFECTIVENESS OF REPORTED ACTIONS

Section 5 . 1 . 1

During our first reporting period, our focus was to gain a better understanding of our modern slavery risks and how such risks may be present in our operations and supply chains. During this reporting period, we met our commitments that are detailed in section 5.1.

MGM Bulk determine that the actions have been effective. The responses to the Modern Slavery Questionnaire allowed MGM to determine the risk profile of each of our tier one suppliers, having clearer visibility of our own Modern Slavery risks that may be present within our supply chains.

In addition, we have also successfully trained all staff that are involved in the procurement of goods or services and employee wellbeing, in Modern Slavery.

Both actions have been effective in spreading modern slavery awareness amongst our suppliers, and our employee group involved in the procurement of goods or services, and employee wellbeing, further reducing Modern Slavery within the MGM Bulk operations and supply chain.

▶ PLANS FOR FINANCIAL YEAR 2023 – 2024

Section 5 . 1 . 1

Over the next reporting period, MGM Bulk will continue to meet our obligations to eliminate the risk of modern slavery within our operations and supply chain network. We have proposed to undertake the following steps over the next 12 months:

- Conduct another supply chain assessment of our current tier one suppliers to assess the risk of modern slavery practices.
- Focus on improving and streamlining our supplier questionnaire process.
- Review our Modern Slavery risk assessment.
- Expand the Modern Slavery training to include all MGM staff during their onboarding.
- Formalise a Modern Slavery Committee with Senior Leadership representation.
- Develop and communicate a Supplier Code of Conduct, outlining MGM's expectations from our Suppliers and how we must work together to improve human rights related practices.
- Further break down our suppliers into tiered groups based on value of spend with the supplier.

▶ CONSULTATION AND APPROVAL

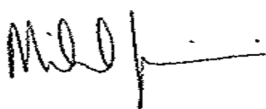
Section 6 . 0

This modern slavery statement was prepared following a consultation process with the MGM Executive Team, HSECO management and procurement personnel responsible for modern slavery compliance.

This modern slavery statement is approved by the principal governing body of the reporting entity, being the Board of Directors of MGM Bulk Pty Ltd on 30 November 2023.



Signed by Giudi Giacci, a responsible member of the reporting entity, in her capacity as Director of MGM Bulk Pty Ltd



Signed by Michael Giacci, a responsible member of the reporting entity, in his capacity as Director of MGM Bulk Pty Ltd

MGMBULK IS PROUD TO PRESENT OUR MODERN SLAVERY STATEMENT FROM FINANCIAL YEAR 2022 TO FINANCIAL YEAR 2023

MGMBULK

