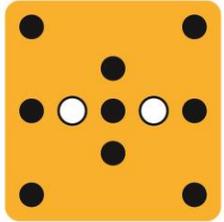


BYRNECUT

**BYRNECUT GROUP
MODERN SLAVERY
STATEMENT FY21**

28 June 2022



MODERN SLAVERY GROUP STATEMENT FY21

BYRNECUT

	Page
1. ByrneCut Group Overview	
Reporting Criteria #1 - Modern Slavery Group Statement	1
Reporting Criteria #2 - The ByrneCut Group	2
2. ByrneCut Group – Supply Chain Assessment	
Reporting Criteria #2 - ByrneCut 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. ByrneCut Group – Future Actions	
Reporting Criteria #5 – Address the effectiveness of future actions	6
4. ByrneCut 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 2021.
- This is a joint statement published on behalf of the Byrnecut Group comprised of:
 - 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 Byrnedcut Group

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

Byrnedcut Group is headquartered in Perth, Western Australia and has a workforce of 5871 employees.

- **Byrnedcut 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 sub-vertical raises.
- **Quattro Project Engineering Pty Ltd** is a project engineering business providing turnkey solutions for the delivery of surface infrastructure and mining related projects.
- **Byrnedcut 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 2800 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 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

- In 2021, the Byrncut Group sent a detailed Modern Slavery questionnaire to 675 of its suppliers as part of our risk assessment process.
- The majority of respondents have provided their modern slavery policy, indicating compliance with modern slavery requirements.
- The responses were reviewed and analysed and no substantial risks were identified amongst the responses.
- In addition, the Byrncut Group has expanded its supplier approval process. Its standard supplier terms and conditions, and subcontracts, were re-drafted to encompass modern slavery clauses. Each new supplier, as well as existing suppliers, is contractually bound by modern slavery compliance requirements.

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

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

Reporting Criteria #4 – Describe the actions taken to address risks (including impact of COVID-19)

Governance:

- Key policies that address human rights and modern slavery include our Group:
 - Code of Conduct
 - Whistle-blowers' 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 site supplier pre-qualification assessment process involves confirmation of compliance requirements (insurance and certifications)

Supplier Contract Terms:

- Our supplier purchase order terms require modern slavery reporting and compliance

Impact of Covid-19

- The Group has experienced supply chain delays due to global supply and logistics challenges. The Byrncut Group communicated with its Tier-1 suppliers in 2021 to identify any increased risks due to COVID 19. No increased modern slavery risks were identified. The Group will continue to monitor the impact of Covid-19 into FY22.

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

The Byrncut Group proposes to implement the following processes over the next 12 months to reduce the risk of modern slavery in its supply chain.

Increased governance across:

Group

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

Suppliers

- Annual audits of our Tier-1 suppliers
- Continued assessment of supplier governance (compliance with procedures and policies) within the Byrncut Group tender process and supplier creation process
- New requirement for suppliers to submit modern slavery policies and procedures as part of their tender submissions and which will form part of the tender evaluation process.

Clients

- On-going compliance with client requests to complete detailed modern slavery questionnaires. Continued review of 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 Byrncut Group with key stakeholders and executive management.
- Each reporting entity within the Byrncut 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 27 June 2022.

A handwritten signature in black ink, appearing to read 'Steve Coughlan', is positioned above the printed name.

Signed: STEVE COUGHLAN
Executive Chairman



A CUT ABOVE™
In contract mining

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