



# Modern Slavery Statement

For Financial Year  
April 2024 – March 2025



# Modern slavery statement April 2024 – March 2025

## Message from our CEO

I present Bradken's fifth Modern slavery Statement, addressing the *Modern Slavery Act 2018* (Australia) and the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada).

At Bradken, our purpose is to equip the resource sector to sustainably advance society. Supporting our customers and employees with responsible and sustainable practices is not just a goal, but a necessity for our future and the protection of human rights.

Despite the many complexities of our operations and markets and our impact across the value chain, Bradken's resolve to minimise modern slavery risks remains unwavering.

Our actions in the past year demonstrate our commitment to protecting those impacted by our operations with:

- ☐ honesty
- ☐ transparency
- ☐ continuous learning
- ☐ curiosity, and
- ☐ courage.

In the coming year, we will enhance our collaboration with suppliers and customers, assess how we leverage advanced technology to better support those affected by slavery and recognise the shared value in our supply chain as an enabler for common good.

I am proud to lead Bradken as we deepen our understanding of our global impact, both directly through employment and indirectly through our supply chains. We are focused on our actions contributing to a brighter, more equitable future for all.



**Sean Winstone**  
**Chief Executive Officer**



### Attestation

This statement has been made with approval of Bradken's Board of Directors and is endorsed on their behalf by Sean Winstone in his role as Chief Executive Officer of Bradken.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

- Sean Winstone
- Chief Executive Officer 31 May 2025
- Signature, accompanied by the statement "I have the authority to bind 'Bradken Pty Limited.'"

Reporting entity and structure

This statement is made by Bradken Pty Limited (ACN 108 693 009), an Australian Proprietary Company and a wholly owned subsidiary of Hitachi Construction Machinery.

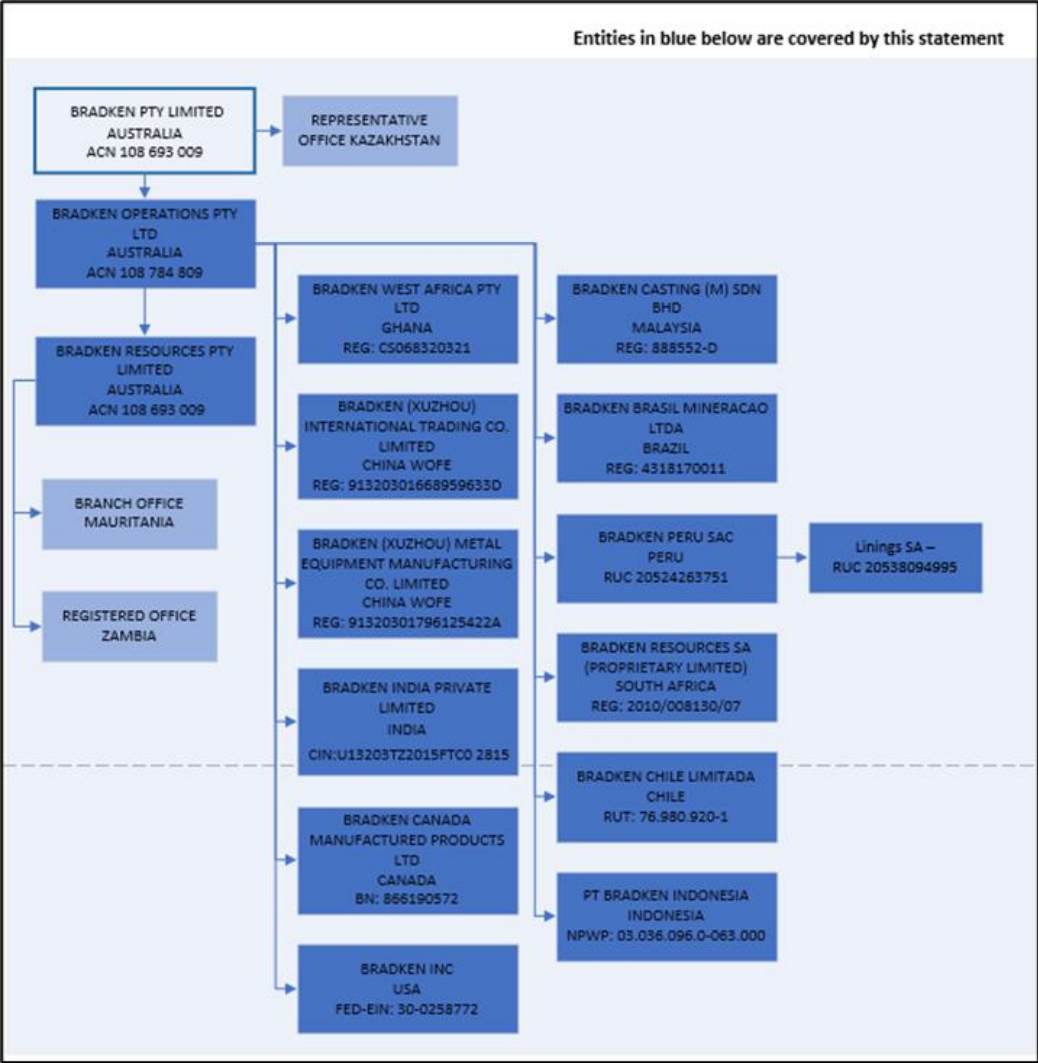
Bradken operates under the Japanese financial year, with the current reporting period from 1 April 2024 to 31 March 2025.

The terms ‘Bradken’, ‘us’, ‘we’, and ‘our’ refer to Bradken Pty Limited and all wholly owned subsidiaries.

Bradken is a global company headquartered in Newcastle, Australia. During the reporting period, our operations were structured into specific businesses: Mining and Specialty Products North America (SPNAM), each dedicated to serving their respective industry sectors.

Although Bradken Pty Limited's subsidiaries are separate legal entities, they operate collectively under a matrix structure as ‘One Bradken’. They share one Executive Leadership Team and centralised functions for Corporate, Finance, Marketing & Technology, Operations – Manufacturing, Operations – Supply Chain (including Procurement), People & Culture, Safety, Sustainability & Quality, Sales, and SPNAM. All corporate policies and procedures apply to all Bradken entities.

Figure 1 – Organisation structure





**Our business**

Bradken is a global solutions provider for the mining sector, specialising in wear parts for mobile plant, fixed assets and mineral processing applications. Our operations include foundries, fabrication and machine shops and corporate offices worldwide.

Our core activities involve melting and pouring metals to produce castings, as well as fabrication, welding, assembly, and maintenance of machinery. We continually invest in product development, research and development, and innovation to meet evolving customer needs, incorporating the latest technology and IoT solutions.

As a socially responsible organisation, Bradken is committed to ethical business practices, respecting human rights, complying with laws and regulations and adhering to a rigorous Code of Conduct.

**Locations**

Bradken has manufacturing facilities in Australia, Canada, the United States (sold during the reporting period), India, China, Peru, and Malaysia. Our corporate offices are in Newcastle and Brisbane, Australia. We also have smaller sales offices in various regions to stay close to our customers.

**Sale of SPNAM**

Late in the reporting period Bradken sold the SPNAM business and its assets (including manufacturing facilities in the US) and now retain only a sales presence in the US.

**Figure 2 – Bradken’s global footprint**



Our people

Bradken prioritises the health and wellbeing of its employees globally. At a peak of the reporting year prior to the sale of our North American assets we employed 3,201 people with most based in Australia and North America. The workforce consisted of 56% wage-paid employees, 37% salaried employees, and 7% contractors. The gender distribution is 88.8% male and 11.2% female.

Bradken aims to provide a safe, inclusive and engaging work environment through various initiatives, including safety programs, monthly discussions, diversity programs and employee assistance.

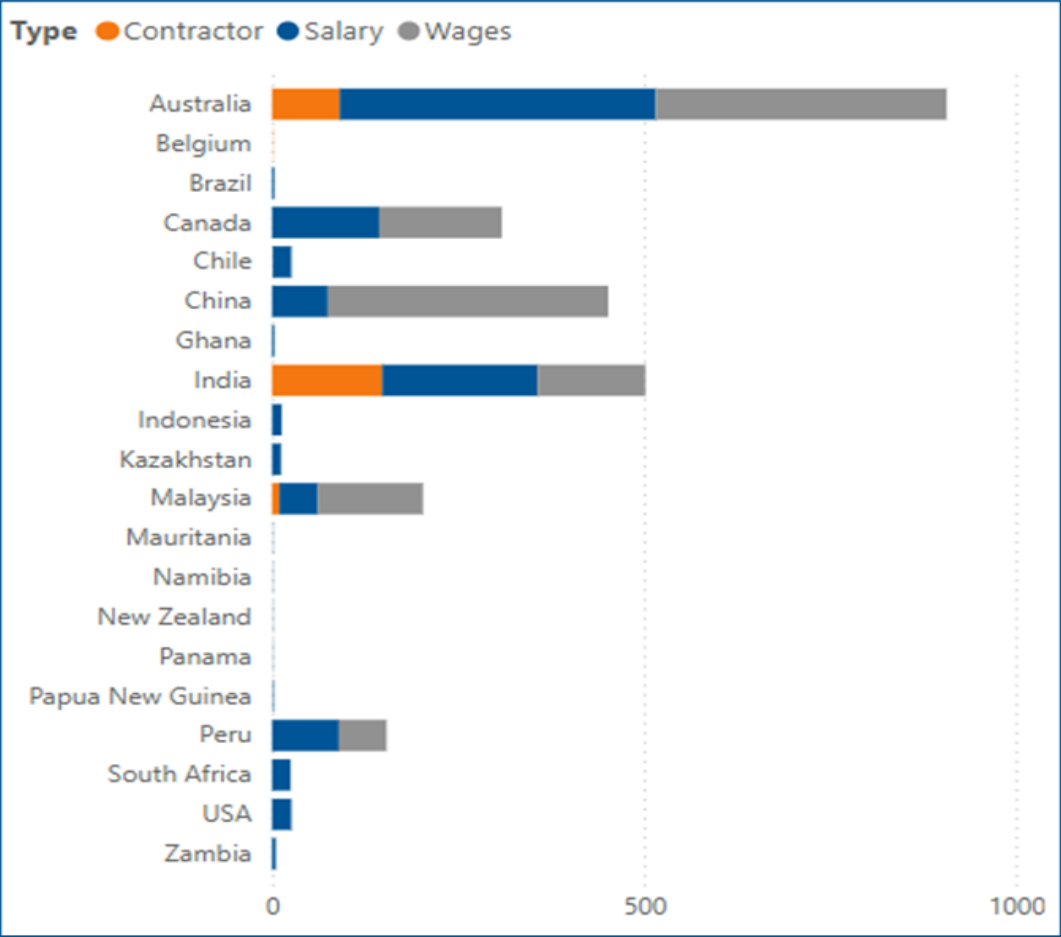
Health, Safety, and Environment (HSE) Initiatives:

- Rules We Live By: Addressing critical safety risks.
- Monthly Team Safe Discussions: Engaging all employees in safety conversations.
- Inclusion and Diversity Program: Promoting a diverse and inclusive workplace.
- Employee Engagement Survey: Gathering feedback to improve employee satisfaction.
- Employee Assistance Program: Providing support for mental and physical wellbeing.

Bradken is committed to ensuring everyone feels safe, included, valued, and respected.

For full list of related policies to how we manage modern slavery, please refer to the appendix.

Figure 3 – Employee numbers/types globally



Our supply chain

Bradken is committed to combating modern slavery in its supply chain. With operations spanning globally, identifying and addressing modern slavery is a priority. Bradken aims to ensure it does not cause, contribute to, or is linked with modern slavery through our interactions.

As of March 2025, Bradken's supply chain included 4,444 active suppliers. Efforts have been made to reduce this number by consolidating spend under Supplier Agreements, improving relationships, and deactivating dormant suppliers.

During the reporting period, 71% of Bradken's spend was on components, consumables, scrap and alloys, and business-wide services. The remaining spend was on logistics, repairs and maintenance, utilities and capital expenses.

Figure 4 – Spend breakdown by category

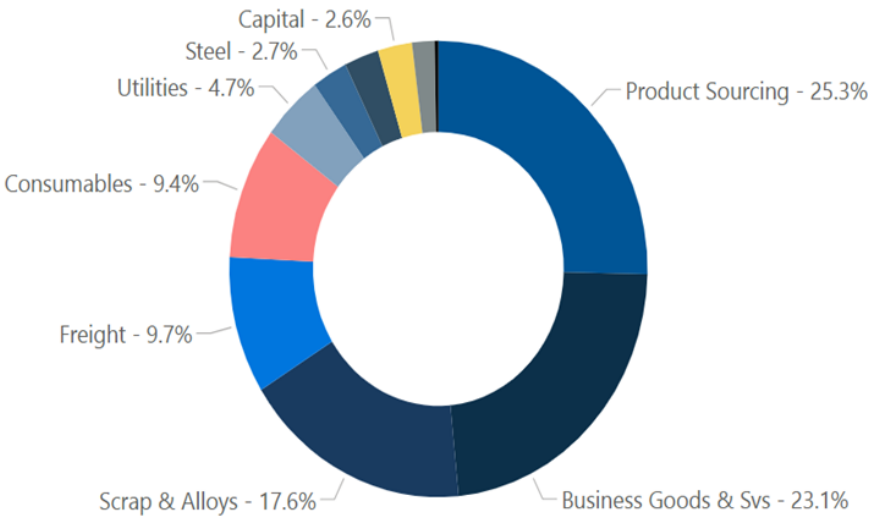


Figure 5 – Main products and services purchased

Category	Products/Services
Components	Forging and castings, steel plate, steel bars, bolts, pins, ceramic tiles, and machining services and outsourcing services that go into producing finished castings
Scrap and Alloys	Various metals (either produced from raw materials or sourced from scrap materials) that are used in the melting process to manufacture our castings
Consumables	Catalysts and binders, ceramic shapes, sands, graphite electrodes, grinding media, welding materials, paints and washes; refractories, thermocouples and timber that are used as part of the process of manufacturing castings
Business Goods & Services	Equipment rental, printing and stationery, travel and entertainment, personal protective equipment, testing services, cleaning and gardening, clothing (uniforms), computer software and hardware and temporary personnel services

Bradken’s modern slavery journey to date

As a global organisation we are primarily focused on the mining sector and are committed to addressing modern slavery, including forced labour and/or child labour within our operations.

As a requirement of the Australian *Modern Slavery Act 2018* and the *Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act*, we have been publishing an annual statement to reflect our endeavours towards addressing human exploitation within our greater value chain.

Over the past four years, we have taken evolving steps to understand, address and acknowledge the gravity of modern slavery. We have engaged with third-party subject matter experts on modern slavery to identify risks in our supply chain and evolved our knowledge to support our capability and thus capacity to manage these issues. It is an ongoing process, and one we are evolving year-on-year to support our own operations, our role in our value chain and our role in our customers’ value chain. This reporting season an evolution in Bradken’s sustainability journey with the inclusion of a new Sustainability and ESG function within Bradken that will support efforts on modern slavery and business and human rights across our value chain. This new function will work with existing HSE and Procurement functions as we review and map out our approach to how we manage modern slavery over the coming three years planning cycle.

This is a joint statement for **Australia and Canada** to meet our reporting obligations. Below is our modern slavery journey over the years:

2019 –2020	2020 –2021	2021 – 2022	2022 –2023	2023 –2024
Bradken pledges to prioritise understanding modern slavery, consider risks, and protect human rights in their supply chain	Bradken commits to risk considerations and continuous improvement across their global footprint	Bradken reviews operations to address human rights and protect worker welfare, aiming to prevent modern slavery in their supply chain.	Bradken intensified its commitment to managing modern slavery risks, emphasising growth impacts and broadening supplier discussions	Bradken integrates experts to enhance controls and understand risks, integrating modern slavery into decision-making and training

Modern slavery risks

In considering our modern slavery risk, Bradken refers to Guidance for Reporting Entities, issued by the Attorney General’s Office, Australia and Minister of Public Safety and Emergency Preparedness, in Canada, as well as the research, recommendations and risk factors outlined in the below publications:

- Global Slavery Index 2023, Minderoo Foundation’s Walk Free initiative.
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition OECD (2016).

Sector and industry risk considerations

Bradken is a leading provider of mining equipment wear parts and services. We specialise in innovative solutions for the mining and resources sector, as well as rail and transit, energy, structural and industrial casting, and defence markets. During the reporting period, with the sale of our SPNAM assets, Bradken has now withdrawn from the defence markets.

Although we supply to the mining sector, we do not operate directly in the extractives sector or other high-risk sectors for modern slavery, such as textiles, fishing, electronics, cleaning and agriculture.

Products and services risk considerations

Bradken’s primary raw materials and inputs are not deemed high risk according to the Global Slavery Index. However, we have identified certain products and services that may be vulnerable to modern slavery. We actively engage with suppliers of these items (listed in Figure 6) to raise awareness and ensure that modern slavery practices are not present. Most of these items are purchased in limited quantities or our exposure is indirect. Our priority is to adopt a risk-based approach to any potential direct exposure, focusing on areas where we can have the greatest influence to drive change.

One significant area of potential risk is outsourcing product manufacture. For details on our actions to address this risk, refer to the ‘Actions taken to address modern slavery risk’ section.

Figure 6 – High risk direct products/services identified

Product / Service	Usage
Outsourcing of Manufacturing	Varying market demand has led to increased requirement to outsource production of selected castings and components
Temporary Labour Personnel	Engaged at our sites through recruitment agencies
Cleaning Services	Engaged at our sites and offices which may employ low skilled or migrant workers
Refractory Bricks	Used for lining our furnaces
PPE /Garments (indirect exposure)	Personal protective equipment (masks/gloves, etc.) corporate uniforms and protective clothing (pants and shirts) for shopfloor workers (and the cotton contained in these garments)
Electronics (indirect exposure)	Laptops, computers, & mobile phones and other electronic equipment purchased for use within our business
Timber	Used in making molds for castings and purchased indirectly in the form of pallets and other packaging
Rubber	Used as a backing material on wear plates for chutes and mill liners manufactured
Tungsten (direct/indirect)	(In small quantities) Purchased either in components or purchased for application to castings wear faces to increase hardness and durability

Bradken employs a small number of long-term migrant workers at our Malaysian facility, starting from 2019. In 2021 as disclosed in previous Statements, a third-party audit found that some workers were charged recruitment fees by an external agency. Bradken investigated, interviewed employees, ensured fees were repaid and updated recruitment policies to prevent future issues. Since this event and subsequent process updates, there has been no recorded incidents and it's managed and monitored via critical controls.

Modern slavery risks and geographical risk considerations

Bradken acknowledges Mauritania's high vulnerability to modern slavery (Global Slavery Index 2023). We maintain a branch office there to support a key customer, with one salaried employee protected by our global policies. As there is no facility or supply chain in Mauritania, the risk of modern slavery is considered low. If the branch office expands, we will implement further due diligence based on local risk factors.

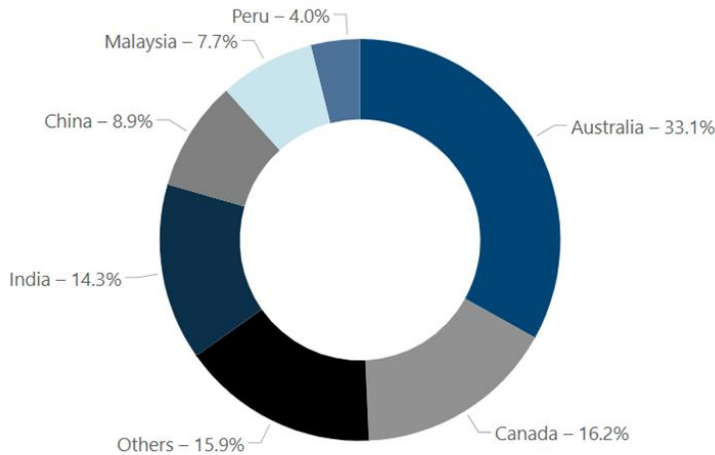
Bradken does not operate or have Tier 1 suppliers in countries with the highest prevalence of modern slavery (North Korea, Eritrea, Saudi Arabia, Türkiye, Tajikistan, UAE, Russia, Afghanistan, and Kuwait).

We recognise that suppliers further down our supply chain may be connected to these countries and modern slavery risks exist in other developed countries as well.

We have active suppliers in 46 countries, with 49% based in Australia and Canada, 31% in India, China and Malaysia, supplying locally to our operations there, and only 20% in other regions.



Figure 7 – Supplier locations globally



Asia Pacific risk considerations

According to the Global Slavery Index 2023, the Asia Pacific region has a high prevalence of forced labour.

We consider this in our risk assessments for operations in India, China, Malaysia, and Indonesia. Our workers are protected via monitored company health, safety and environmental processes including access to Ethicspoint grievance mechanisms process, and we do not operate in high-risk sectors. However, local sourcing in these regions may expose us to modern slavery risks in supply chains. Our focus remains on addressing these potential risks effectively via our due diligence processes, supplier education, vendor onboarding, supplier minimum requirements and risk-based factory inspections.

South American risk considerations

Bradken's operations focus on skilled manufacturing and distribution, reducing our exposure to modern slavery. However, we remain aware of risks, especially in areas with illegal mining, logging, and political instability. The Global Slavery Index 2023 highlights vulnerability in parts of South America due to socio-economic challenges and emerging governance on a complex issue. These factors heighten exploitation risks in our supply chain, emphasising the need for robust controls, including site audits, annual training, and supplier due diligence.

North America risk considerations

In 2023, 69,000 people in Canada experienced forced labour or forced marriage, ranking 144th globally and 25th in the Americas for modern slavery prevalence according to the Global Slavery Index 2023.

Despite its low ranking, Canada can face challenges related to forced labour and child labour in certain industries. We are committed to combating modern slavery, promoting supply chain transparency, and mitigating risks through site visits and annual training.

Actions taken to assess and address modern slavery risk

Building on action from previous years, Bradken has undertaken several initiatives during the reporting period to address the potential risk of modern slavery.

Supplier questionnaires

During the previous reporting period, Bradken engaged Centrl to provide an online platform for our Procurement team to distribute modern slavery and Forced Labour and Child Labour questionnaires and assess risks among our suppliers.

The platform has a modern slavery questionnaire, developed by subject matter experts, that considers suppliers' practices, policies and procedures about modern slavery, forced labour and child labour as potential exposure and interactions through their supply chains.

During the reporting period, and in addition to the online platform, Bradken engaged a leading third-party risk management provider, Information Services Group (ISG).

This brought modern slavery subject matter expertise and experience in identifying and assessing modern slavery risks to Bradken's modern slavery processes. For the suppliers in scope, ISG also undertook extensive research into secondary sources such as Code of Conduct, ethical sourcing, whistleblower policies, responses to human exploitation legislation outside Australia, news and alerts, including adverse media, as well as any other information which may be used to mitigate modern slavery risk to ensure that any ambiguous finding was thoroughly investigated.

### Supplier questionnaires (continued from previous page)

A total of 985 questionnaires were sent to a range of suppliers in Indonesia, Chile, Peru, Canada and Australia based on products, services or regions that could be considered at high risk for modern slavery.

At the time of compiling this statement, 220 suppliers had responded to the questionnaires. Following the autoscoring by the Centrl platform, ISG performed their analysis, including raising any issues which were subsequently discussed with and reviewed by the Bradken Procurement Team.

The assessments not only included suppliers' actions and practices regarding modern slavery and forced labour and child labour but also how proactive suppliers are and their level of awareness and incorporation of modern slavery and forced labour and child labour risk into their internal processes and procedures.

This methodology enables Bradken to continuously review and monitor supplier risk and if necessary, raise issues if a supplier's risk posture regarding modern slavery changes due to internal or external factors.

As a result of this assessment methodology, Bradken assessed its operations and supply chain and found no known evidence of modern slavery identified during this reporting period.

Analysis of the suppliers' responses indicates the following trends:

- No known evidence of slavery or human trafficking in Bradken's business or supply chain at Tier 1.
- Many suppliers have policies in place to ensure no forced work or child labour occurs and acceptable working conditions are provided.
- Suppliers confirmed that they periodically check for red flags indicating that modern slavery practices may be present.
- Large suppliers have confirmed that they have training regarding modern slavery and human trafficking available to increase the awareness and share ways of identifying it within the organisation or supply chain.

- Small to medium enterprises may not necessarily have the same level of corporate policies in place as larger organisations. This insight provides opportunities for continual improvement and support for Bradken's modern slavery mitigation efforts in the coming financial year and mid term period as we evolve our capabilities and risk based priorities.
- Several suppliers confirmed they have engaged in due diligence which allows them to assess the potential risk inherent in their operations and supply chain.
- In some jurisdictions, particularly in South America and Asia Pacific where modern slavery disclosure legislation is being established or evolving, the concept of modern slavery is still emerging. With the rise of sustainability disclosures and requirements, business and human rights are becoming increasingly important. This shift will offer Bradken and its suppliers greater partnership opportunities to mitigate modern slavery risks and impacts in these regions.
- Suppliers confirmed that they have engaged in due diligence that analyses and mitigates risk from a business or investment decision.

### Increasing awareness of modern slavery and forced labour and child labour risks

To ensure awareness of modern slavery and forced labour and child labour risk is increased among Bradken's current and new suppliers, topics to highlight the risks have been added to the agenda of regular supplier relationship meetings.

Bradken has seen an increase in the awareness of modern slavery risks, not only in our immediate supplier base but also in our wider value chain – both upstream and downstream.

During the reporting period, several examples illustrated our commitment to combating modern slavery. One notable instance involved a direct customer in Australia who sought modern slavery management plans and partnership discussions as part of the contracting process. This interaction significantly enhanced our understanding of modern slavery, highlighting the importance of overcoming human exploitation globally. It also underscored the controls that can be implemented to combat modern slavery and emphasised the crucial role of Bradken's supply chain, both upstream and downstream, within our customers' broader value chain. This has triggered numerous opportunities for greater partnership on how to manage shared risks and opportunities.

## What's next?

Our supplier assessments have continued to provide insights into the level of awareness and potential risks relating to a selection of our suppliers (identified as high-risk products, services, or regions).

We have confirmed that sending questionnaires, combined with a deep dive into secondary sources of information, is continuing to raise awareness of modern slavery issues in our supply chain.

To further improve visibility, Bradken will continue to assess a significant number of suppliers during the next reporting period. This reporting period focused primarily on assessment of suppliers in Indonesia, Chile, Canada, Peru and Australia.

In addition to these target regions, Bradken will continue to monitor all suppliers, through its onboarding due diligence process as well as regular site audits, to ensure any risk of modern slavery is identified and mitigated in a timely manner. All employees have access to the Bradken Procedure, "Assessing Modern Slavery Risk" which includes Bradken's commitment and expectation as well as how to address suspected instances of modern slavery, forced labour and child labour. All suppliers to Bradken have access to, and are required to comply with, Bradken's Supplier Code of Conduct, Conflict Minerals and Ethical Sourcing Policy. Copies of these policies are available in the *appendix* to this statement.

Next financial year, Bradken will review modern slavery risks in our enterprise and value chain. This will help improve our controls as we enhance our understanding through better supply chain transparency and partnerships with key stakeholders.

## Supplier Code of Conduct – Mandatory agreement

During the 2020-2021 reporting period, Bradken introduced a Supplier Code of Conduct which was communicated to new suppliers via email. The Supplier Code of Conduct sets out Bradken's expectations of suppliers for areas such as ethical standards and behaviors, compliance with laws, health, safety and environment, treatment of employees and covers modern slavery and prohibits use of forced or child labour.

To ensure we reach as many suppliers as possible, we updated our supplier onboarding process to a digital platform, the Bradken Supply Hub. This enabled us to provide a copy of the Supplier Code of Conduct to potential suppliers during their online registration process, requiring them to confirm agreement to abide by it before they are approved as an active supplier. Bradken continues to review and update its policies, including the Supplier Code of Conduct, on a regular basis.

The Supplier Code of Conduct is available in English, French Canadian, Spanish and Chinese, representing the languages, spoken by our supplier base.

All copies of our relevant policies mentioned including Bradken's Supplier Code of Conduct, Conflict Minerals and Ethical Sourcing Policy are available on Bradken's website.

## What's next?

In the coming year we intend on further raising awareness of modern slavery issues throughout our business via the annual training to keep modern slavery risks front of mind.

All new employees will receive the training when they are assigned a Bradken email address.

As part of the new financial years focus and modern slavery risk review, we plan to assess and develop awareness materials that can be shared with our suppliers, to increase awareness in our global supply chain both at onboarding and throughout the lifecycle of the supplier relationship.

## Annual training

We continue to focus on our annual employee training on modern slavery issues and risks, offering training, in English, Simplified Chinese, Malay, Spanish and French Canadian, making sure more of our people develop an understanding of the topic.

Bradken is expanding its focus beyond modern slavery training to include workplace psychosocial hazards and mental health risks. During the reporting year, Bradken planned the second Workplace Psychosocial Hazard Assessment Survey, which will be conducted from June 2025. This survey will be available to all global employees to address mental health hazards and potential exploitation risks.

### Supplier site visits/audits

Visiting supplier sites for modern slavery audits remains a key part of our strategy. This year, we conducted 24 site visits, engaging directly with suppliers to discuss modern slavery risks in our supply chains. We inspected their premises and spoke with workers firsthand. Although no red flags were identified, we reviewed safety practices and provided recommendations for housekeeping and employee wellbeing.

These visits revealed a growing awareness of modern slavery, yet highlighted areas for improvement across various regions which have been captured in our 2025 Modern Slavery Plan and actions for continuous improvement. Suppliers responded positively, showing eagerness to cooperate and proactively address issues. These visits are invaluable for building relationships and raising awareness of modern slavery risks among our suppliers.

### What's next?

Supplier site visits for modern slavery audits will continue to be part of our actions to address modern slavery risk.

Our Procurement team, supported by our Sustainability and ESG team, will continue to increase the number of site visits during the next reporting period as part of team members' personal KPI goals as we can see the value in these visits as an opportunity to build relationships with our suppliers while raising awareness of issues.

Further capability in identifying potential modern slavery risks as part of supplier visits and selections will be reviewed as part of our greater 2025 modern slavery risk and controls review.

### Examples

#### Supplier site visit/modern slavery audit

As part of efforts to assess risk and raise awareness in our supply chain, Bradken representatives visited sites, including to a scrap and alloy recycling facility based in Canada and metal casting facility in Asia.

#### Metal recycling site audit - Canada

During our site visit to the metal recycling plant, our Procurement Business Partner discussed modern slavery, forced labour and child labour risks with management. We covered the new Canadian legislation, audit importance and Bradken's goals. Hazardous goods were properly marked, stored and labelled, and equipment was well maintained with safety precautions. Bradken emphasised regular risk assessments, robust policies and procedures to prevent and address modern slavery. We also recommended training for employees and suppliers to recognise and report signs of modern slavery and encouraged supplier engagement to promote transparency and accountability in the supply chain.

#### Metal casting producer – site due diligence – Asia

Our Procurement team conducted final due diligence on a metal casting providers supply chain in Asia with their leadership and regional agent. Despite high levels of automation, quality and governance, we identified low adherence to PPE, especially eye and ear protection. We raised concerns about this issue, emphasising that our standards for contract manufacturing are as stringent as Bradken's own. Consequently, we negotiated firm commitments and established roadmaps for improvement with the suppliers. This is still actively monitored.



## Management of outsourcing risk

Bradken is increasingly outsourcing components and castings manufacturing in India and mainland China, recognising this as a high-risk area but one where we can exert influence.

We consider commercial, technical, safety, quality, CSR, and sustainability factors when selecting suppliers. Our due diligence includes evaluating suppliers' operations and their external CSR activities, emphasising community investment to reduce modern slavery risks.

Our Product Sourcing team rigorously reviews potential suppliers, supported by a third-party in India conducting preliminary due diligence. This includes desktop reviews and physical site visits to assess capability, capacity and working conditions, with a focus on safety and modern slavery red flags.

A SWOT analysis identifies weaknesses and suggests improvements. Suppliers' cooperation with recommendations indicates a positive working relationship and reduced modern slavery risk.

All suppliers who pass the preliminary site visit from the third-party are then visited by Bradken personnel to verify their suitability before we consider entering into a supply agreement with them. At this stage there is an opportunity to:

- View progress of implementation of any recommendations from the third-party.
- Conduct further screening including analysis of financial reports and wages and salaries data to ensure proper legal wages are being paid to workers.
- Require completion of and talk about the modern slavery questionnaire.
- Reinforce Bradken's expectations of Corporate Social Responsibility including the Supplier Code of Conduct; and
- Consider the supplier's own Corporate Social Responsibility efforts and engagement with their community.

## Due diligence process – components business

Our due diligence process for the Components Business has been significantly enhanced, focusing on outsourcing suppliers. During the reporting period, Bradken implemented the following changes:

- Decisions are no longer based solely on cost or capability.
- Supplier suitability is determined only after physical inspections and comprehensive audits of their premises and initial statements.
- A full suite of requirements is completed, including technical maturity, CSR, safety, economics (value for money), modern slavery, and company ownership.
- The same criteria are applied to existing vendors during annual audits.

## Bradken sustainability focus via UN Sustainable Development Goals

The Sustainable Development Goals (SDGs) are the United Nations (UN) blueprint to achieve a better and more sustainable future for all. They address the global challenges we face.

At Bradken, we are aligning our sustainability and modern slavery efforts in the products we buy and use, and in our operations, focusing on SDG 12: Responsible Consumption and Production. In the new financial year, we will integrate data to better understand our supply chain, addressing the overlapping issues of slavery, sanctions, scope 3 emissions, and circularity.



Supporting communities where we live and work

At Bradken, we recognise that modern slavery is a deeply gendered issue with an estimated 71% of victims likely to be women and girls, according to the Global Estimates of Modern Slavery report by the Walk Free Foundation, the International Labor Organisation and the International Organisation for Migration.

We focus on providing a brighter future for women and girls through STEM (Science Technology Engineering and Mathematics) based education opportunities. We partner with recognised educational organisations to deliver three programs, and each year about 150 girls participate in these positive educational experiences.

We recognise the role companies like ours can play in supporting the communities in which we operate, and we demonstrate our commitment to playing our part to empower young girls through educational partnerships with organisations in Peru, India and Australia.

Puthri, Coimbatore INDIA



**Puthri** is India's first developmental project seeking career intentionality amongst underprivileged females. Bradken has a five-year partnership with Puthri (2020-2025) to sponsor 100 girls between grades 8 to 12 at the Government Higher Secondary School, Chettipalayam, just 4km from our foundry in Coimbatore. The purpose is to assist girls in understanding their own capabilities, encourage them to stay in school and maintain their studies including STEM subjects, while developing skills for a successful career.

STEAM Girls, Moquegua PERU



**Steam Girls Moquegua** launched in March 2022, funded by Bradken and run by UNESCO Award winning City Makers. It's an after-school program run through the Santa Fortunata school in Moquegua, in Southern Peru, aimed at providing enhanced STEAM (Science, Technology, Engineering, the Arts and Mathematics) learning experiences for high school aged girls.

HunterWiSE, Newcastle AUSTRALIA



On Australia's east coast, we partner with HunterWiSE – through the University of Newcastle (UoN) - to support future female STEM professionals through a 10-week High School Outreach program. The program provides female Year 8 students, the opportunity to work with STEM academics and mentors and engage with industry sponsors, to identify and develop creative solutions for local community issues.

## Assessing the effectiveness of our actions

Modern slavery is an ongoing agenda item in Bradken's Export Control Committee (ECC) meetings to ensure executive level involvement and oversight of the actions being taken to address modern slavery issues and the effectiveness of these actions.

The committee meets quarterly and includes representatives from our Executive Leadership Team, Sustainability, Governance and Risk, Supply Chain, Sales and Procurement functions, who review modern slavery actions and issues on a regular and ongoing basis.

### Percentage of awareness training completed, and number of employees reached

The ECC oversees the modern slavery training to ensure that the training is available to as many Bradken's staff as possible; that staff complete the available training, and that the completion rate is within the expected range. For this reporting period, the training completion rate was 98%. The ECC will also review plans for expansion of modern slavery training.

### Ongoing supplier questionnaire responses

We will monitor and report to the ECC the number of suppliers reached via Supplier Questionnaires, along with their risk ratings and addressed issues, to measure the effectiveness of our actions. The introduction of a modern slavery, forced labour, and child labour assessment expert has more than doubled our response rate and significantly improved the comprehensiveness of assessments through both direct responses and secondary sources. This will be reviewed in 2025 as part of the greater modern slavery program risk review to ensure our programs and processes are evolving with contemporary standards and seek greater impact. This work will be lead and supported by Bradken's Sustainability and ESG Team.

### Additional information

#### Impacts of COVID-19

This reporting period saw no impact of COVID-19 to our operations with no site closures reported.

## Consultation with Subsidiaries

The legal entities covered by this statement operate as 'One Bradken', and the policies, approaches and actions outlined in this statement apply to all. Bradken's centre led functions of People & Culture, Safety Sustainability and Quality, Legal and Procurement have all worked collaboratively with our Sales teams in Bradken's efforts to address modern slavery risks and all relevant functions provided contributions to the preparation of this statement.

## Conclusion

In 2024, Bradken celebrated 102 years of operation. We remain committed to supporting the global resource sector and responding to changing circumstances with a focus on people as we integrate business and human rights into our approach to sustainability.

Our goal is to be the partner of choice for innovative wear solutions while enhancing our support for the global community.

We continuously evolve our review and assessment processes for operations, procurement, manufacturing, social responsibility and sales to address human rights issues and protect workers' welfare in our supply chains. Our teams work closely with suppliers to ensure modern slavery awareness is a priority and extends throughout Bradken's supply chain, including through site visits.

We will continue to assess our supply chain for any signs of human exploitation by leveraging the latest technology and engaging modern slavery experts, reinforcing our commitment to eradicating human exploitation and promoting business and human rights transparency.

# Appendix



## Appendix

### Addressing the Mandatory Criteria set out in the Acts

Mandatory Criteria	Relevant Page Number
a) Identify the reporting entity	3
b) Describe the reporting entity's structure, operations and supply chains.	3 -6
c) Describe the risks of Modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	7-8
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	8 -15
e) Describe how the reporting entity assesses the effectiveness of these actions.	15
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	15
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant (optional)	13-18

## Appendix

### Key policies and processes

Bradken modern slavery related policies that bind impact and governance – click link to access

#### Relevant Bradken Policies

[EthicsPoint and Whistleblower Policy](#)

[Ethical Sourcing Policy](#)

[Supplier Code Of Conduct](#)

[Conflict Minerals Policy](#)

[Addressing Modern Slavery Risk](#)

[HSSE Policy](#)

[Bradken HCM Code of Conduct](#)

[Anti corruption policy](#)

[Risk Management Standard](#)

[Respecting Our Communities](#)

[Privacy Policy](#)

#### Bradken Annual Disclosures

[2024 - Workplace Gender Equality Agency Report](#)

[2024 – Modern Slavery Statement Australia](#)



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