



Modern Slavery Statement

2021

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This Modern Slavery Statement has been endorsed by the Jenmar Australia board of directors and approved on 31 March 2021.

Peter Roberts

Managing Director

Respecting human rights is an essential obligation of our business including actively ensuring that there is no modern slavery throughout our business activities. We regularly assess our risk profile and will take all necessary actions to immediately address any potential areas of concern.

JENNMAR's Australian manufacturing operations personnel are employed under Commonwealth guidelines dictating conditions and remuneration, and our domestic supply chain has been assessed as insignificant risk.

Our overseas supply chain presents a higher element of risk, due primarily to the geographical difficulty in assessing supplier operations. Where direct assessment is not possible we undertake credible third party assessments to review and monitor commitment to human rights and the prevention of modern slavery practices.



Introduction

JENNMAR Australia Pty Ltd is a wholly owned business of Frank Calandra Inc. (FCI) headquartered in Pittsburgh USA. The JENNMAR Australia Managing Director reports directly to the President of FCI.

JENNMAR Australia's head office is located at our manufacturing facility in Smeaton Grange NSW.

JENNMAR is a leading global manufacturer and supplier of ground support products for underground mining and tunnelling. We manufacture primarily steel products at three major locations in Australia at Sydney, Mackay and Perth. We also operate smaller warehouse and distribution centres at Broken Hill, Mount Isa and Kurri Kurri.

Jenmar Australia currently employs approximately 250 people across our manufacturing, distribution, sales and administration functions. Our manufacturing operations utilise Australian produced steel with our ground support products sold mainly to Australian domestic customers with some export sales.

The primary products manufactured include rebar bolts, friction bolts, cable bolts and bearing plates plus a complete range of ancillary products and components. Other key products including steel mesh and cement grouts are manufactured by third party Australian providers and supplied direct to customers or warehoused and distributed from our strategic locations.



Where possible JENNMAR Australia sources raw materials and components from reputable Australian domestic producers. Currently the bulk of all material and component purchases are supplied from within Australia. Relatively small percentages of purchases are made from JENNMAR related overseas corporations and from non-related suppliers in China and Japan.

A thorough risk assessment was completed on our key material and component supply chain which categorised the supply chain into the following groups:

- Domestic suppliers
- Related international suppliers
- International suppliers - China
- International suppliers - Japan

Domestic suppliers, have been categorised as insignificant risk due to the fact that they operate under commonwealth guidelines and Australian government legislation, plus their operations are readily accessible for assessment by JENNMAR personnel.

Related international suppliers, have been categorised as insignificant risk due to the fact that JENNMAR has direct control over the employment conditions of its personnel.

International suppliers – China, have been categorised as moderate risk for JENNMAR owing to the geographical difficulty in accessing their operations for the purpose of evaluation and assessment which is further compounded by the current COVID-19 related travel restrictions.

International suppliers – Japan, have been categorised as insignificant risk owing to the fact that it consists of large multi-national suppliers and their operations have been previously visited and reviewed on multiple occasions by JENNMAR representatives.



Actions

Our procurement process includes undertaking due diligence and evaluation of proposed supplier quality management systems. This process has been expanded to include the evaluation of modern slavery practices however as a result of COVID-19 some of our planned activities in 2020 and 2021 have been effected.

With a total base of more than 300 suppliers, we place a high emphasis on quality, security of supply and sustainability and have long term business relationships with many of our suppliers both domestic and international.

Prior to COVID-19 our key international suppliers were visited annually by a representative from JENNMAR Australia and their operations and supply performance reviewed to ensure they could sustainably continue to maintain secure supply to JENNMAR of quality components.

Following the completion of our detailed risk assessment, our total supplier base was categorised into two separate groups:

1. Suppliers where a Modern Slavery Assessment was deemed necessary
2. Suppliers where a Modern Slavery Assessment was not deemed necessary

During 2021 and each subsequent year, we have scheduled to complete a Modern Slavery Assessment of 25% of our supplier base where a Modern Slavery Assessment is deemed necessary. This will include the assessment of current suppliers and the evaluation of all new suppliers.

Where direct assessment of an international supplier is not possible due to travel or other constraints, assessments will be undertaken by JENNMAR approved credible third party providers.

Any suppliers found to have areas of potential concern within their business will be provided the opportunity to respond to the concerns. If the response is unsatisfactory and an acceptable way forward cannot be agreed between both parties, JENNMAR will look to source materials from alternative approved suppliers.



The effectiveness of JENNMAR's actions to identify and eliminate potential incidences of modern slavery practices from our total supply chain will be reviewed as part of our annual statement preparation and submission process.

The commitment required from our suppliers will be measured as a combination of their formal responses to our reviews, as well as their willingness to both participate in the reviews and their response to any identified areas of concern within their businesses.

JENNMAR's commitment to the process will be demonstrated by our actions in the event that any potential instances of Modern Slavery are identified in our supply chain as a result of our reviews. After our initial supplier reviews during 2021, a further 25% of suppliers will be assessed each subsequent year as part of our ongoing commitment to reviewing our supply chain risks.

The results of our annual efforts will form part of future statement submissions and any necessary refining of our review processes.



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