

RIVET GROUP

Modern Slavery Statement – FY2020



Introduction

This Statement is made under the Australian Modern Slavery Act 2018 (Cth) for the financial year ending 30 June 2020 (“FY20”) and is published on behalf of Blondie Trading Pty Limited (ACN 621 811 845) and its consolidated subsidiaries (Rivet Group).

It covers the operations and supply chain of the Rivet Group which includes the following Australian reporting entities in accordance with s14(1) of the Act:

- Rivet Mining Services
- Rivet Energy
- Rivet Aviation
- Refuel International
- SMS Mining Services

The Rivet Group acknowledges and recognises that modern slavery occurs in many forms including slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage and child labour.

The Rivet Group will not tolerate any form of human rights abuses, including modern slavery in our operations and supply chains. This statement outlines the Rivet Group’s approach to ensuring we have robust systems and procedures in place to minimise the risk of modern slavery.

This statement reports on the financial year from 1 July 2019 to 30 June 2020.

Structure, Operations & Supply Chain of Rivet Group

The Rivet Group is an Australian provider of specialised transport and logistics, contract mining, equipment hire and maintenance and aviation services. The Group consists of Rivet Mining Services, Rivet Energy, Rivet Energy Aviation, Refuel International and SMS Mining Services.

Rivet Mining Services

Rivet Mining Services (RMS) provides bulk haulage and ancillary onsite services (such as road construction and maintenance operations) to mining companies operating in the key resource producing regions of Western Australia. Services primarily comprise of truck haulage across off-road and on-road (highway) routes from mine to port facilities and/or processing infrastructure.

Rivet Energy

Rivet Energy is a national provider of LPG and liquid fuel logistics for global oil and gas companies in key metropolitan centres and interstate routes throughout Australia. With over 47 years' of industry experience, Rivet Energy delivers benchmark service levels and specialist workshops in key metropolitan locations throughout Australia.

Rivet Energy Aviation

Rivet Energy Aviation provides specialist technical labour and services for aircraft refuelling at Tullamarine Airport in Victoria and Adelaide Airport in South Australia. The team operates specialised refuelling equipment on the ground to refuel aircraft, and manages fuel farms at each of the sites.

Refuel International

Refuel International is a global leader in the manufacturing of mobile aviation refuelling equipment. With over 50 years' knowledge and experience, it is an expert in the field of designing and constructing the highest quality mobile aviation equipment, catering to customers' specific needs.

SMS Mining Services

SMS offers life of mine services including equipment rental, maintenance and contract mining to the surface mining sector. It has one of the largest privately owned mining fleets in Australia and has workshops facilities in three strategically locations in Western Australia.

Rivet Group's supply chains are, but not limited to, the following:

Supply Chains	
Subcontractors	Spare Parts
Labour Hire	Vehicle Servicing
Personal Protective Equipment (PPE) and uniforms	Material Handling Equipment
Marketing/Promotional Material	Equipment Suppliers
Fuel / Oil / LPG	Packaging
Motor Vehicles & Plant	IT Software/Hardware
Trailers and ancillaries	Stationary Supplies
Tyres	Cleaning Services

Risks of Modern Slavery in Rivet Group Operations & Supply Chain

Rivet Group is aware of the potential to inadvertently cause, contribute to or be linked to modern slavery through our operations and/or supply chains.

Operations

Rivet Group's biggest Operational risk to inadvertently causing, contributing to, or being linked to modern slavery is through the engagement of labour hire workers and/or subcontractors to provide a vast array of services.

Supply Chain

Rivet Group identified two key industries in our supply chain with increased risk to inadvertently causing, contributing to, or being linked to modern slavery. The two key industries identified were suppliers of Personal Protective Equipment (PPE) and uniforms and Marketing/Promotional Material.

COVID-19

The ever evolving global pandemic, COVID-19, has had a significant effect on Rivet Group's operations and supply chain. The international, interstate and intrastate lockdowns and border closures that have been implemented by federal and state governments around the world have restricted the movement of employees and goods both internationally and within Australia. This has had a direct impact on Rivet Group's operations and supply chain. Many interstate employees, labour hire, subcontractors elected to remain on site and avoid travelling to their "home" state during times of interstate border restrictions. As many employees, labour hire and subcontractors within Rivet Group were required to work during the global pandemic, they were at risk of contracting COVID-19 in the workforce.

Action taken by Rivet Group

Operations

Rivet Group's senior management team is experienced in risk analysis and management. The senior management team is supported by each entity's general manager and by the Health, Safety, Environment & Training and Human Resources teams.

Rivet Group believes sound analysis and management of risks, supported by the below policies and procedures, will assist in defining and guiding a culture that does not allow any type of human rights abuse to occur:

- Rivet Group Code of Conduct
- Rivet Group Minimum Standards of Conduct
- Rivet Group Whistleblower Policy
- Rivet Group Equal Employment Opportunity Policy
- Rivet Group Risk Management Policy

Rivet Group directly employs the vast majority of our workforce and only engages labour hire or subcontractors to assist with manning in peak periods and to cover short term roles. This means, through our sound risk management, relevant policies and procedures and compliance to relevant employment law(s) and industrial instruments, the risk associated with engaging labour hire and subcontractors are minimised.

Rivet Group also abides by the *Contractor Driver Minimum Payments Road Safety Remuneration Order* to ensure minimum requirements are met for all employees, labour hire and subcontractors.

Supply Chain

Rivet Group completed an investigation to determine all organisations in our supply chain from the two key industries identified as high risk, Personal Protective Equipment (PPE) and uniforms or Marketing/Promotional Material, that had supplied the Rivet Group with goods and/or Services during the reporting period.

Five (5) suppliers of Personal Protective Equipment (PPE) and uniforms were identified, and Four (4) suppliers of Marketing/Promotional Material were identified.

All Nine (9) of the organisations identified in our supply chain from the key two industries were assessed internally by our Human Resources team using the below risk matrix:

Sector & Industry Risks

Is there a high prevalence of modern slavery in the particular industry or sector?

Product and Services Risks

Is there a high prevalence of modern slavery associated with the good or service?

Geographic Risks

Is there a high prevalence of modern slavery in the location that the production or service is sourced or produced from?

Supply Chain Model Risks

Is the supply chain model the supplier is likely to be involved in carry a greater risk of modern slavery?

Rivet Group mapped the likely modern slavery risks across the four categories for each organisation and ranked each organisation's risk level under each individual category using the following ranking system:

- Low Risk Level = 1
- Medium Risk Level = 2
- High Risk Level = 3

An overall score for each organisation was tallied and organisations with a score of 9 or higher were identified as a high-risk supplier. All high-risk suppliers were requested to complete an internal "Rivet Group Supplier Questionnaire". The Rivet Group Supplier Questionnaire is a tool to assist Rivet Group assess our high-risk suppliers' policies and practices to identify, assess and mitigate modern slavery risks in their supply chains and operations.

Rivet Group is committed to collaborating with our high-risk suppliers to ensure any modern slavery risks identified through the information provided these suppliers in the Rivet Group Supplier Questionnaire are addressed accordingly and in an appropriate timeframe.

COVID-19

Rivet Group ensured employees, labour hire and subcontractors minimised the risk of contracting COVID-19 through the following measures:

- Providing additional appropriate PPE to all workers.
- Promoting and, when required, enforcing social distancing requirements.
- Promoting and, when required, enforcing camp rules within dry mess and wet mess.
- Promoting and, when required, enforcing disinfecting of work stations including in the cabin of all vehicles at the start and end of every shift.

To ensure employees, labour hire and subcontractors were not forced to remain on site when they were unable or unwilling to return to their "home" state, they were offered the following benefits:

- Accommodation provided in the local town or capital city
- Meals provided to them during their stay
- If they opted to return to their "home" state, payment for their time during isolation upon return to the state in which they are engaged to work in.

Assessing the Effectiveness of Rivet Group's Actions

Rivet Group is continuing to collect data and information relating to our risks of human rights abuse, including modern slavery in our operations and supply chains. In the Financial Year 2021, Rivet Group is committed to assessing the effectiveness of its actions by reviewing our implementation of our commitments across the Rivet Group.

Rivet Group's Future Commitment

Rivet Group will further address the risks of modern slavery in our operations and supply chain by focussing on the following items in Financial Year 2021:

- Developing a clause to include in all labour hire and subcontractor individual and commercial contracts committing them to not engage in modern slavery.
- Developing an E-Learning training course to educate all employees, labour hire and subcontractors on the Act.
- Encouraging employees, labour hire and subcontractors to come forward when they believe there is a risk of modern slavery within Rivet Group in accordance with the Rivet Group Whistleblower Policy.
- Complete an audit and review of all suppliers in the Rivet Group supply chain to ensure no human right abuses and ensure compliance with the Act.

This Statement was approved by the board of Rivet Group on 31 March 2021.



Mark Rowsthorn

Managing Director

Rivet Group