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CATERPILLAR

MODERN SLAVERY STATEMENT

DCL Corp Pty Ltd & Iron Mine Group
of Companies for the Financial Year 30 June 2021



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1. OUR COMMITMENT

We are committed to social responsibility matters and recognizes the importance of human rights and opposes slavery of all forms.

We recognize Modern Slavery can include slavery, servitude, human trafficking, forced marriage, child and forced labour, debt bondage and we will continue to work to understanding the Modern Slavery risks, improving awareness and taking action to positively contribute to improving the state of Modern Slavery. Our statement for the Financial Year ended 30 June 2021 is made in accordance with the Australian Modern Slavery Act 2018 that covers off our group structure as outlined in 2. Reporting Entity Overview.

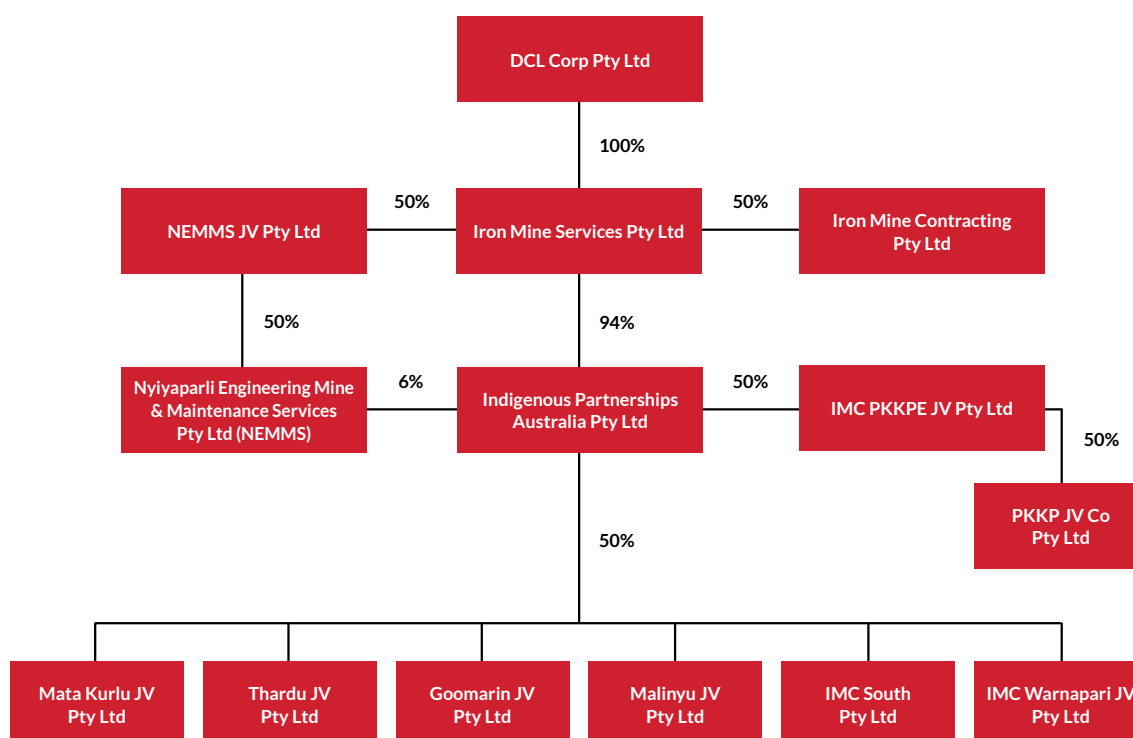
2. REPORTING ENTITY OVERVIEW

This is a combined statement is made in accordance with the Australian Modern Slavery Act 2018 and applies to DCL Corp Pty Ltd (ACN 633 008 992).

Our registered office located in Mt Lawley, WA and our financial year period is 1 July 2020 to 30 June 2021.

The corporate structure is outlined below and this combined statement covers all named entities.

For the purposes of reference across this statement, we will refer to the whole group, including DCL Corp Pty Ltd as “Iron Mine Contracting”.



3. OUR OPERATIONS AND SUPPLY CHAIN

Iron Mine Contracting was formed to provide Civil, Mining, Crushing and Screening and Indigenous partnering opportunities to the West Australian market. We and our indigenous Joint Venture partners have been delivering projects to Tier 1 Resource clients since 2013.

Our client operations we support are typically are present in gold, iron ore and oil & gas sectors.

CIVIL CONSTRUCTION

MINING CONTRACTING

CRUSHING SCREENING

INDIGENOUS PARTNERSHIP

MINING

SITE SERVICES

*Earthmoving construction
services*

Mining

Support Services

Ore and mineral production

Sustainable Outcomes



Headquartered in Bayswater, Western Australia and employs over 300 people across project and workshop operations in Western Australia.

Indigenous Partnerships Australia (IPA) is an affiliate company, formed with the express purpose of partnering with Traditional Owner businesses across Australia. Through their journey our partners expand and grow their capability and their businesses towards independence, deriving tangible benefits for our partners, their businesses and their communities.

Our supply chain across good and services supplied in supporting business operations across our core activities and market segments as outlined above mostly include, but not limited to:

- Equipment & fleet hire
- Consultancy
- Equipment parts, components and spares
- External labour & subcontractors
- PPE
- Workshop consumables and tooling
- Tyres & Rims
- IT equipment and consumables
- Transportation services
- Facilities
- Recruitment
- Office supplies and staff amenities
- Fuel and heavy equipment lubricants

The various categories of good and service providers utilized in our supply chain spans across over 500 suppliers, all of whom are Australian entities with whom we directly transact with however, there is offshore supply chains within their operations in provision of supply.

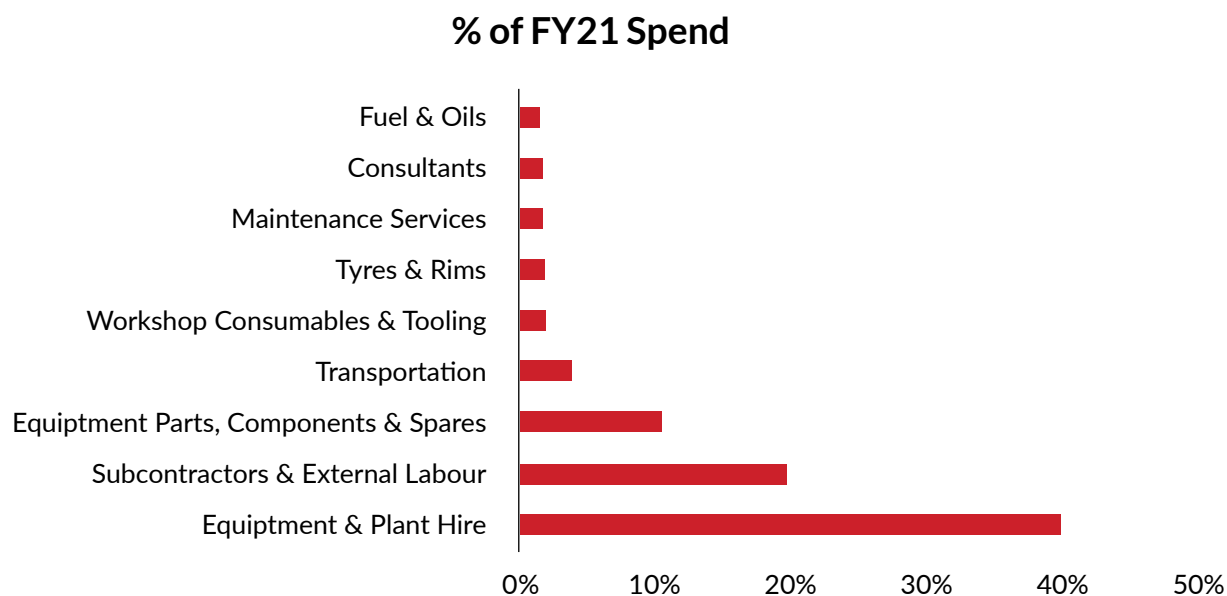
4. RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAIN

Whilst our direct workforce is a major and integral component of our supply chain, we believe that there is low risk of modern slavery due to our compliance with relevant employment laws, occupational health & safety laws and industrial instruments. 100% of our workforce resides and is employed in operations in Australia.

Additionally, the Code of Ethics Policy commits all employees and those we work with, to not use forced, compulsory or child labour. The Policy further commits us to uphold fundamental Human Rights by conducting ourselves and the business in accordance with relevant human rights laws and regulations

Through our General Terms and Conditions, all subcontractors including employment agencies engaged are required to act in a legal and ethical manner

Outside of direct employed workforce, approximately 80% of our supply chain spend is attributed to the following categories of goods & services to support our operations:



As our suppliers are Australian entities, the overall risk of modern slavery we expect is low. According to the Global Slavery Index 2018 (GSI), Australia has a very low prevalence of modern slavery.

However, we do recognize there is the potential for modern slavery in categories above such as Tyres & Rims, Equipment Parts, Components & Spares where our suppliers direct and indirect supply chains extend into low cost country regions.

Whilst not in the top 80% of our spend, categories such as PPE, IT Equipment that we do procure goods & services could also present this risk in line with the GSI 2018 highlighting electronics and garments in the top 5 categories of importing risk.

5. ACTIONS TAKEN BY IRON MINE SERVICES TO ASSESS AND ADDRESS

A summary of our actions and initiatives revolved around the following key areas during FY21 undertaken by various departments across our organization:

Policy, Awareness and Communications

From a broader policy standpoint, we undertook a review of our corporate policies. As part of this, the Code of Ethics Policy was updated to reflect our principles and position which outlines those we work with, not use forced, compulsory or child labour. The Policy commits us and our employees to uphold fundamental Human Rights by conducting ourselves and the business in accordance with relevant human rights laws and regulations. This policy is communicated through a variety of methods including:

- As part of the onboarding process for new employees and contractors;
- The Code of Ethics policy is displayed at all project offices; and
- All of the mentioned documents are hosted and updated as required on the IMS company

Additionally, our Recruitment and Selection Procedure details the responsibilities of our HR department to complete for all employees a pre-employment verification process that includes validation of identification of potential ID and age of potential employees.

Our Subcontractor Onboarding checklist provides for the same verification of all our subcontractor's identification and ages for labour hire, short term workers and personnel seeking to attend any of our projects.

Supplier Assessment and On-Boarding

Our actions across our suppliers were primarily geared around assessment and identification mechanisms through reporting, due diligence on new supplier on-boarding and supplier reviews.

A spend and category analysis for FY21 was undertaken on organizational spend footprint which helped to inform and assess our potential exposure and risks across our supply chain as already highlighted in 4. Risks of Modern Slavery in our Supply Chain

Further to this, at supplier level, we updated our contractor management system, MyOSH, to incorporate screening of new suppliers to ascertain process and policies in place in relation to addressing modern slavery and ethical sourcing within their organization.

Our procurement team maintains and conducts a schedule of business review meetings ('BRM') across our key supplier relationships which enables a forum to identify and manage supply risks, including modern slavery. To date however, no issue in relation to directly impacting us on modern slavery has arisen through these review meetings.

Major Investment in Systems and Reporting

We commenced a transformational review in FY21 and business case development to upgrade our enterprise business systems that would uplift reporting capability, improved integration and supporting business processes. We anticipate that the enhancement in reporting capability and analytics will have help contribute to refining ongoing Modern Slavery risk identification and assessment across our supply chain.

6. PROCESS OF CONSULTATION

In developing this Statement, we engaged and informed key functional areas (Procurement, Business Systems, Human Resources, HSEQ, Indigenous Partnerships, Finance, Commercial, Operations) across Iron Mine Services and its affiliated joint ventures.

Reviews of the statement were conducted by senior leadership members as to the Board of Directors.

7. IMPACT OF COVID19- ON FY21 STATEMENT

During COVID19, the business experienced increased organic growth to meet increased client opportunities in the WA mining sector. With the additional focus in supporting our workforce through the pandemic and managing global supply risk disruptions impacting our supply chain, more comprehensive and targeted supplier engagement and educational initiatives to assess and address modern slavery were limited despite our best endeavors.

8. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

The ongoing effectiveness of Modern Slavery assessment and continuous improvement implementation will be coordinated by the Procurement function with support of the leadership team.

As FY21 is our first statement, we remain committed to reviewing our progress against actions moving forward. Process mechanisms that already exist within our business to gauge the effectiveness and validity of a range of actions outlined in our statement, include but not limited to:

- Scheduled internal policy reviews and updates
- Grievance investigation process
- Supplier review meetings

9. STATEMENT APPROVAL

This Statement is made on behalf of Iron Mine Contracting for the financial year ending 30 June 2021 and it has been approved by our governing body, the Board of Directors on 31st May 2022



Clinton Keenan

Chief Executive Officer

(Signing as authorised Responsible Member)