



MODERN SLAVERY STATEMENT

Redpath (Australia) holdings Pty Ltd
2022

Document Reference No: 21-22
Issued: 1 July 2022

Safety – First, Last and Always.

DOCUMENT SUMMARY

Written By	Emma Fairley
Contributors	Nil

REVISIONS

REV NO.	DATE	REVISED BY	SUMMARY
1	1 July 2021	n/a	
2	1 July 2022	Emma Fairley	Updated to address mandatory criteria for modern slavery statement

DOCUMENT APPROVAL

APPROVER NAME	TITLE	SIGNATURE	DATE
Gavin Ramage	Managing Director – Redpath Australia		1 July 2022

TABLE OF CONTENTS

1.0	ABOUT REDPATH.....	4
1.1	Out Business.....	4
1.2	Philosophy and Guidelines	4
2.0	THE REPORTING ENTITY	4
3.0	REDPATH SUPPLY CHAINS	5
4.0	MODERN SLAVERY RISKS.....	5
5.0	CONTROLS & ASSESSMENT	6

1.0 ABOUT REDPATH

1.1 Out Business

Redpath Australia is part of the Redpath Group, and we provide mining and engineering services to clients throughout Australia and overseas.

Our approach to doing business with our clients, combined with our capabilities in underground mining and raiseboring, has established Redpath as a trusted partner on key mining projects over many years.

Here at Redpath Australia (Redpath) we understand that businesses play a vital role in eradicating modern slavery, which includes the crimes of human trafficking, forced labour, servitude, debt bondage, and the exploitation of children. Redpath recognises that respecting the right to be free from modern slavery is embedded in our company Guidelines for Success but requires a focused and collective commitment and responsibility to ensure we meet our ethical and legal obligations.

In this Modern Slavery Statement under the Modern Slavery Act 2018 (Cth), we are pleased to outline our initial actions we have undertaken in F21, and will continue to do so, to assess modern slavery risks that could exist in our business operations and supply chains and take steps to avoid such risks in the future.

This statement for Redpath Australia was approved by the Board of Redpath Mining Incorporated as the parent entity of Redpath Australia on 11 August 2022.

1.2 Philosophy and Guidelines

Our Guidelines for Success make clear to our employees the actions and behaviours expected of them when representing Redpath. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating in Australia and overseas and in managing our supply chains.

Our Guidelines for Success contain the following statements that specifically support our approach to eliminating modern slavery:

- We are honest, fair, and responsible
- We work by our principles of "Safety - first, last and always"
- We act in the long-term interest of our company and our clients
- We do not take advantage of short-term situations

2.0 THE REPORTING ENTITY

This Modern Slavery Statement is made in accordance with the Modern Slavery Act 2018 (Cth) for the period 1 July 2021 to 30 June 2022. This is a joint Statement made on behalf of the following entities ("Reporting Entities"):

- UnderAus Group Holdings Pty Limited (ACN 117 850 576)
- Eroc Holdings Pty Limited (ACN 097 085 973)
- Redpath Australia Pty Limited (ACN 067 084 708)
- Redpath Contract Services Pty Limited (ACN 133 126 904)
- Redpath Australia Coal Pty Limited (ACN 169 251 129)
- Redpath (PNG) Limited (Coy Number 1-60879)

This Statement captures the activities of Redpath (Australia) Holdings Pty Ltd, its subsidiaries and all its controlled entities.

3.0 REDPATH SUPPLY CHAINS

Redpath’s supply chain includes the procurement of goods and services.

In F21 Redpath had 868 active suppliers with a total spend of \$86 million dollars (AUD). Most of our suppliers are in Australia. Our major supply chains include the following services and products:

- Equipment and spares
- Consumables
- Oils and lubricants
- Site utilities and infrastructure
- Freight and transport
- Explosives
- Travel & Accommodation

Redpath recognises that its suppliers may source products from outside Australia, which has the potential to present a risk to modern slavery.

In FY21 Redpath undertook a rigorous exercise to reduce our suppliers and negotiated National Agreements with our major category suppliers.

This exercise and decision process included assessing where the products were sourced and assessed whether the supplier had appropriate modern slavery tools to mitigate any risk and had ethical sourcing.

4.0 MODERN SLAVERY RISKS

Redpath have identified that the significant modern slavery risks are likely to be in the supply chain. Redpath Australia also tenders for projects in overseas locations that may require direct employment of nationals or sourcing local labour via in-country labour hire providers.

Modern slavery risks identified for Redpath Australia include:

RISK CATEGORY	RISK DISCRIPTION
Supply chain management risks	<ul style="list-style-type: none"> • Supplier does not have a policy or process that prohibits modern slavery in its operations and in those of its suppliers • Supplier does not have policies and processes to identify, investigate and remedy risk and instances of modern slavery • Supplier cannot demonstrate employee training to manage modern slavery risk • Supplier does not conduct due diligence for modern slavery risks on its suppliers • Supplier does not require suppliers to conduct due diligence for modern slavery on their suppliers

Supply Chain labour risks	<ul style="list-style-type: none"> • Supplier is in contravention of the United Nations International Labour • Organisation (ILO) conventions that prohibit the worst forms of child labour • Supplier does not undertake checks to ensure child labour is not being used within its organisation or suppliers • Supplier cannot demonstrate compliance to fair work principles or the Fair Work Act 2009 (Cth) • Supplier does not have a mechanism to anonymously raise issues related to labour conditions or workplace grievances
Supply chain goods risk	<ul style="list-style-type: none"> • Supplier has a facility (or facilities) in locations identified as 'high risk' • Supplier provides goods/materials or services identified as 'high risk'

5.0 CONTROLS & ASSESSMENT

Redpath's goal to maintain responsible and transparent supply chains. Redpath proposes to implement the following processes over the next 12 months to reduce the risk of modern slavery in our supply chain.

CONTROL CATEGORY	ONGOING CONTROLS IN PLACE	ASSESSMENT EFFECTIVENESS
Governance	<p>Key Policies that address human rights and modern slavery for Redpath:</p> <ul style="list-style-type: none"> • Code of Conduct • Modern Slavery Policy • Diversity and Inclusion Policy • Grievance Policy 	Internal Audits to ensure employee all trained in code of conduct and track completion of training
Supply Chain goods & labour	<ul style="list-style-type: none"> • Conduct due diligence in new supplier requests • Continue to ensure suppliers of goods and services to Redpath comply with the Modern Slavery Act 2018 (Cth) and Redpath's related policies. 	Internal Audits to ensure new suppliers are aware of our modern slavery Policy Statement
Reporting	<ul style="list-style-type: none"> • Whistle blower policy and anonymous reporting process whereby an employee or contractor may report any instances of suspected modern slavery in the workplace and/or supply chain. A 	Internal Compliance checks to ensure all reports made our investigated

	report using this service will be investigated confidentially in accordance with Redpath's whistle blower policy.	
--	---	--