



DT390

MODERN SLAVERY STATEMENT

Iron Mine Contracting Group of Companies
for the Financial Year 30 June 2022



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IMCPL.COM.AU

1. OUR COMMITMENT

Iron Mine Contracting is committed to being socially responsible in all our operations and throughout our supply chain. We recognize the importance of human rights and oppose slavery in all its forms. It is fundamental to our core values of “Listen” and “Recognise” that all people in our business and associated with our business are treated fairly and with respect.

Our goal is to maintain a socially responsible and transparent supply chain, and we are committed to conducting business in an ethical and respectful manner.

Our statement for the Financial Year ended 30 June 2022 is made in accordance with the Australian Modern Slavery Act 2018.

2. OUR VALUES

OUR VALUES

LISTEN People are our prime asset. Your ideas underpin our success	THINK Plan your success. There is always a better, safer way.
COMMIT Never walk past a problem. Always take action.	RECOGNISE The shared story of every Australian. Strength through diversity.

**WE COMMIT TO OUR KEY SAFETY BEHAVIOURS,
LIVING OUR VALUES & BUILDING OUR SAFETY CULTURE**

3. OUR APPROACH

Iron Mine Contracting recognises Modern Slavery can take many forms which may include:

- Forced labour
- Debt bondage or bonded
- Human trafficking
- Descent-based slavery
- Child
- Forced and early

We continually assess these risks within our supply chain and operations through:

SUPPLIER ENGAGEMENT

We actively engage with our suppliers to understand their approach to modern slavery risks and their remediation processes should any instance be identified in their supply chain.

AWARENESS

Through engagement with our leadership group we have developed awareness of modern slavery risks and clearly identified channels to report any concerns.

SAFE WORK CONDITIONS

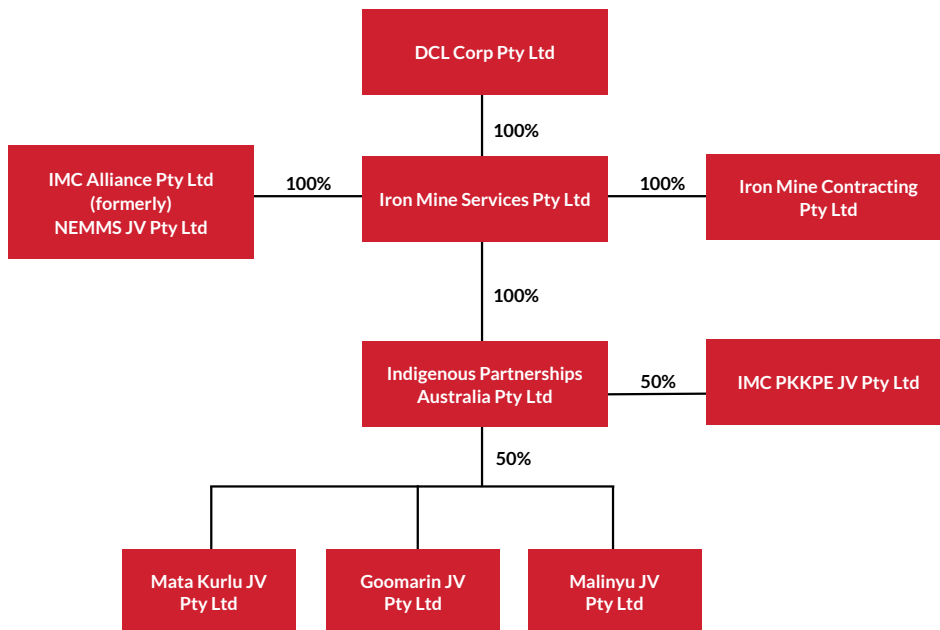
Our primary focus is a safe work environment for all our employees, subcontractors and any other personnel who interacts with our operations.

4. OUR COMPANY STRUCTURE

Our combined statement is made in accordance with the Australian Modern Slavery Act 2018 and applies to all entities in the Iron Mine Contracting Group.

Our registered office is located in Mt Lawley, WA and our financial year period is 1 July 2021 to 30 June 2022.

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.



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, lithium and oil & gas sectors.



We are headquartered in Bayswater, Western Australia and employ over 400 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.

5. OUR SUPPLY CHAIN

Our supply chain spans across over 800 suppliers, all of whom are Australian entities, and consists of goods and services supplied for the purpose of supporting business operations across our core activities.

Over 85% of our supply chain in FY22 was focused on:

- Plant and Equipment Hire
- External Labour hire and Subcontractors
- Equipment Parts, Components and Spares
- Tyres and Rims
- Repair and Maintenance Services
- Freight and Heavy Haulage
- Fabrication Services
- Workshop Consummables and Tooling
- IT equipment and Consummables
- Recruitment Services
- Oils and Lubricants

We recognise that there is increased risk of modern slavery occurring in the supply chain where Supplier parts are sourced and fabricated outside of Australia.

We mitigate this risk through our General Terms and Conditions of supply which states that subcontractors and suppliers are required to act in a legal and ethical manner.

Modern Slavery compliance is also assessed through our Contractor Management program, MYOSH, through data collection of supplier's policies and procedures. No breaches to Modern Slavery practices were identified in FY2022 in our supply chain.

6. OUR OPERATIONS

We believe that there is low risk of modern slavery in our direct work force due to our compliance with relevant employment laws, occupational health and safety laws and industrial instruments.

100% of our workforce resides and is employed in operations in Australia.

Our 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.

Our Grievances and Disputes policy allows participants, both direct work force and contractors, to bring workplace grievances to a resolution through a confidential and fair process.

No modern slavery breaches in our operations were identified in FY2022.

7. OUR ACTIONS AND ASSESSMENT

In FY2022, we continued to assess modern slavery risk and compliance in our operations and supply chain through:

REVIEW NEW VENDOR SUBMISSIONS

All MYOSH submissions on new vendors were reviewed to assess modern slavery compliance.

IMPROVED AWARENESS

Our leadership team were educated on our FY2021 Modern Slavery Statement and corresponding Code of Ethics policy to increase awareness of the risk and outline reporting channels for any suspected breaches.

SYSTEMS AND REPORTING

In FY2022 we implemented a Power BI reporting suite which has allowed better insights into our supply chain and potential risk of modern slavery.

A review of these processes was undertaken and deemed to be sufficient to allow identification of breaches or instances of modern slavery in our operations and supply chain.

8. OUR CONSULTATION

We acknowledge our responsibility to ensure that the relevant personnel and associated entities are consulted in the preparation of this statement.

9. OUR FUTURE FOCUS

Iron Mine Contracting is committed to a continual improvement plan in assessing modern slavery risk and mitigation. Our objective is to eliminate risk in our supply chain and identify and breaches or non-compliance in a timely manner. We plan to do this through:

ANNUAL ASSESSMENT

MYOSH will be used to conduct an annual assessment of all suppliers and subcontractors with respect to modern slavery compliance. Any breaches will be immediately investigated.

PROTOCOL FOR BREACHES

A clear guideline for escalation of identified breaches will be drafted, reviewed and educated to our leadership team.

POLICY REVIEW

A review of the Code of Ethics policy and Grievances and Disputes policy will be undertaken.

10. OUR STATEMENT APPROVAL

This Statement is made on behalf of the Iron Mine Contracting for the financial year ending 30 June 2022 and it has been approved by our governing body, the Board of Directors on 15th June 2023.



Clinton Keenan

Chief Executive Officer

(Signing as authorised Responsible Member)