

Introduction

MacKellar Mining Pty Ltd ABN 81 150 919 761 trading as MacKellar Group (**MacKellar**) is committed to acting ethically and with integrity in all our dealings and relationships, and to implementing effective systems and controls to safeguard against modern slavery occurring anywhere in our business, whilst also reducing the risk of modern slavery within our supply chain.

We expect our suppliers and contractors to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking and child labour.

Company Structure, Operations and Supply Chains

MacKellar was founded in 1966 and specialises in civil earthmoving, open cut mining and flexible hire of large mining equipment. It is incorporated in Australia and its registered office is in Maroochydore, Queensland, Australia.

Our operations are currently located in Queensland where we have approximately 630 full time employees who are employed across sites including Carmichael Coal Mine, Callide Mine, Yancoal Yarrabee, Curragh, Anglo American - Dawson and Callide, Middlemount and Jellinbah. Our workforce has increased by 180 employees from the previous 2019/2020 Modern Slavery reporting period.

Our personnel work in various disciplines, including Health and Safety, Technical Services, Information Technology, Training, Finance, Procurement, Human Resources, Engineering, Trades and Maintenance, Plant and Equipment Operations, Administration, Management and Environmental services. Our corporate office is located at Nambour on the Sunshine Coast.

We have a fleet size of approximately 365 mining machines and provide over 55 years of earthmoving expertise as one of Australia's largest privately owned mining equipment and service providers.

MacKellar has an ongoing relationship with three key equipment suppliers, and for the purposes of this 2020/2021 Modern Slavery Statement, we continue to engage collaboratively with them as well as explore the risks of modern slavery within our minor suppliers.

Our minor suppliers operate in industries that provide goods and services including office equipment, uniforms, tools, mechanical maintenance, parts, accessories and services, consumables, cleaning, accommodation, labour hire, chemicals, fuel, surveying, legal services, safety equipment, freight and logistics, fabrication services and IT services.

The Risks of Modern Slavery Practices in our Operations and Supply Chains

Whilst recognising our statutory obligation under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) to set out the steps we are taking to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. However, as part of our risk-based approach to combating modern slavery, we continue to implement measures to identify modern slavery risks within our suppliers and contractors.

Our operations are currently based in Australia and our personnel are remunerated in line with applicable industrial instruments. We regularly engage with independent auditors for compliance purposes to ensure that all our personnel are paid fairly and equitably, and as such, consider the risk to our employees of modern slavery at MacKellar to be extremely low. Health and Safety is key to our operations for both employees and contractors with regular audits conducted on all sites. The accommodation provided to our employees and/or contractors is in line with Australian Standards and legislative requirements.

On our journey to combat modern slavery we have implemented processes that require our suppliers and contractors to provide us with a Pre-qualification Questionnaire. The information we receive from them enables us to assess the risk of Modern Slavery practices in our supply chain.

We will continue to actively utilise online resources such as Global Slavery Index - <https://www.globallslaveryindex.org>, Walk Free - [Walk Free](#), and Anti-Slavery Australia - [Modern Slavery | Anti Slavery Australia](#) to enable us to assess geographic and industry/product risks, and more generally, to understand modern slavery issues, enabling us to identify areas of risk within our business operations and supply chains.

Actions Taken to Assess and Address Modern Slavery Risks

- MacKellar is committed to engaging suppliers and contractors that uphold the same principles as we do, and where necessary we will implement corrective measures for non-compliance or inaction in addressing issues on a case-by-case basis. No instances of suspected modern slavery have been identified in this reporting period.
- We continue to collaboratively engage with our three key OEM (*Original Equipment Manufacturers*) suppliers who have processes in place to work towards reducing the risk of modern slavery within their supply chains. These suppliers have produced modern slavery statements which are registered with the Department of Home Affairs. We have reviewed the action these key suppliers are taking in ensuring that modern slavery does not form part of their supply chains and are satisfied that they are addressing the risks of modern slavery in their organisation and their supply chain.
- We continue to focus on maintaining long term relationships with trusted suppliers and contractors enabling robust conversations and partnerships, that ultimately reduce the risk of modern slavery within our direct supply chain.
- We have developed a portal through which our suppliers are requested to provide us with relevant information via an automated questionnaire. This allows us to effectively assess the risk of modern slavery in our supply chain and take remediation action where required.

- MacKellar is implementing a Modern Slavery training program that appropriately addresses the following groups:
 - ✓ Senior Managers involved in procurement decisions and the modern slavery remediation process
 - ✓ All other MacKellar workers including contractors
- Our training aims to ensure that:
 - ✓ Relevant personnel have the tools and ability to undertake effective risk assessments that result in the elimination of modern slavery practices within our supply chain
 - ✓ Our workers understand the serious exploitation of human rights that is defined under modern slavery legislation
 - ✓ Our workers are clear about the process to follow should a suspected instance of modern slavery arise within our supply chain so that the situation is effectively remediated and not exacerbated
- Our training program also incorporates MacKellar’s Whistleblower Policy and Procedure so that workers understands that they may make a “Disclosure” safely, securely and with the confidence they will be protected and supported
- Our company’s recruitment, diversity and remuneration policies support our efforts to combat modern slavery by ensuring that our personnel are recruited fairly and equitably and in line with relevant industrial instruments and legislation.
- We will continue to value and observe all laws regarding corporate social responsibility, environmental and workplace safety, protection and staff inclusion and diversity through shared company policies and processes and our training and communication methods.

Assessing the Effectiveness of our Actions

MacKellar is committed to ensuring the effectiveness of our actions through the following:

- Training of all MacKellar Personnel and Contractors
- Regular review of our processes by designated personnel
- Increased supplier and contractor engagement and monitoring with processes in place to document and quantify results for measurement and reporting purposes
- Continuation of internal audits on an annual basis to ensure that we are compliant with the relevant industrial and health and safety laws within Australia

Consultation with Entities Owned or Controlled by MacKellar

MacKellar does not own or control any other entities which require consultation.

Approval

This statement for MacKellar Mining was approved by the Board of MacKellar Mining on the 22nd of December 2021.



Duncan MacKellar
Managing Director