



Bradken Procedure

Addressing Modern Slavery Risk

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C00117

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1 Purpose

This document sets out Bradken’s approach to mitigating the risks of slavery, human trafficking, and related forms of serious worker exploitation occurring in our global business operations or supply chains.

In January 2018, the Australian Commonwealth enacted the Modern Slavery Act (hereafter The Act) which requires all entities operating in Australia with a combined revenue of AU \$100M or more to lodge an annual statement reporting on the risks of Modern Slavery in their supply chain and the measures taken to address those risks. Under the Act, Modern Slavery is defined as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services.

Bradken holds itself to the highest ethical standards and fully supports the Modern Slavery Act. We value our people and integrate safety into everything we do. We are committed to providing a safe and inclusive environment for our employees where diversity is respected, and mental and physical well-being is

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protected. We expect our suppliers to uphold the same values and are committed to addressing the risk of Modern Slavery within our global supply chain.

2 Scope of The Document

This document applies to Bradken Pty Limited and all its wholly owned subsidiaries (hereafter Bradken).

All persons or parties working for Bradken in any capacity, including temporary and permanent employees at all levels, directors, officers, agency workers, seconded workers, volunteers and any persons or parties working with Bradken including agents, independent contractors, external consultants, third-party representatives, suppliers and business partners are expected to comply.

3 Responsibilities and Compliance

1.1 Executive Leadership Team (ELT)

The ELT of Bradken maintain overall responsibility for ensuring this procedure is implemented and for monitoring its use and effectiveness. The Export Control Committee (ECC) has been designated as the forum for regularly reviewing the actions taken within Bradken to address the risks of Modern Slavery. The ECC is chaired by Bradken Chief Executive Officer and contains representatives from ELT, Legal & Governance, Sales and Supply Chain Functions.

1.2 Management Roles

Management at all levels are responsible for ensuring that those reporting to them understand and comply with this procedure and for escalating all instances of actual or suspected Modern Slavery they become aware of.

1.3 Employees

All employees are expected to comply with this procedure and are responsible for maintaining their own awareness of the risks of Modern Slavery in their day-to-day dealings with internal and external business partners and for reporting any suspected incidents or risks as soon as possible, if they believe or suspect that an instance of Modern Slavery has occurred or may occur in the future.

3.1.1 Safety and Sustainability

Safety and Sustainability function is responsible for providing safe and healthy working conditions, minimising workplace hazards and risks, and preventing injury and ill health for staff and employees.

3.1.2 People and Communications

People and Communications function is responsible for developing and maintaining policies and procedures in relation to recruitment, human resources and payroll, that align with regional laws and regulations and that protect employees basic human rights.

3.1.3 Procurement

Procurement function is responsible for ensuring ethical sourcing practices are upheld in the process of engaging contracted suppliers and that Bradken's expectations regarding Modern Slavery and Human rights are communicated to our suppliers.

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1.4 Suppliers

Suppliers must notify Bradken as soon as possible if they believe or suspect that an instance of Modern Slavery or Human Rights abuses have occurred or may occur in the future in their operations or supply chains.

1.5 Compliance Manager

Compliance Manager is responsible for notifying ELT of reported instances of actual or suspected Modern Slavery and for facilitating an action plan for any instances reported based on the guidance outlined in this document.

4 Terms, definitions and abbreviations

Modern Slavery is defined by the Act as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services. This procedure relates to that definition as well as any circumstance in which basic human rights are adversely affected.

5 Main Body of document

5.1 Bradken Commitment

Modern slavery is a serious crime and a violation of fundamental human rights. Bradken is committed to acting ethically and with integrity in all of our business dealings and relationships and to implementing and enforcing robust systems and controls to manage the risks of modern slavery and ensure transparency in our own business operations or in our supply chains. We expect the same standards from our suppliers.

Bradken reference the Ethical Trading Initiative (ETI) Base Code, founded on the International Labour Organisation (ILO) conventions, as minimum standards of practice for ourselves and our suppliers and these are incorporated into our Ethical Sourcing Policy and training on Modern Slavery Awareness and our corporate policies and procedures reinforce these expectations.

Under the ETI Base Code:

- Employment is freely chosen
- Freedom of Association and the right to collective bargaining are respected
- Working Conditions are safe and hygienic
- Child Labour shall not be used.
- Living wages are paid
- Working hours are not excessive
- No Discrimination is practiced
- Regular Employment is provided
- No harsh or inhumane treatment is allowed

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5.2 Established Practices

5.2.1 Training

Training on the risks of modern slavery practices in our supply chains has been implemented and will be periodically provided to those Bradken employees in executive and management roles and those roles that deal with our people, our suppliers and our customers.

5.2.2 Whistleblower Hotline

Bradken provides a confidential Whistle-blower facility which is available for both employees and external parties to report activity inconsistent with worker welfare standards, without fear of retaliation. Details of the Whistle-blower policy are provided to employees on induction, published on our website and included in our Supplier Code of Conduct to promote availability to a wider audience. We take seriously any claims that human rights are not properly respected and investigate all allegations thoroughly.

5.2.3 Codes of Conduct

Bradken employees are expected to abide by established codes of conduct to ensure ethical and socially responsible behaviour throughout our operations. Suppliers are expected to abide by our Supplier Code of Conduct which outlines minimum expectations in regard to human and employee rights.

5.2.4 Understanding Our Supply Chain

Bradken undertakes Supply Chain Mapping through various processes, such as supplier onboarding, supplier questionnaires and tender processes in order to identify and address areas of Modern Slavery Risk.

5.3 Expectations

Employees and Suppliers (or parties in our supply chain) are expected to raise concerns about any issue or suspicion of modern slavery in any parts of our business, our supply chains, or the supply chains of any supplier at the earliest possible stage.

5.3.1 Employees

Employees must notify their manager or legalservices@bradken.com as soon as possible if they believe or suspect that a breach of this MSA Policy has occurred or may occur in the future. Alternatively, an employee may anonymously report their belief or suspicions to the Bradken Whistle-blower hotline in accordance with our whistle-blower Policy].

If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions, whether in our business operations or supply chains, constitutes any of the various forms of modern slavery, the employee should raise their concerns with their manager or legalservices@bradken.com as soon as possible.

5.3.2 Suppliers

Suppliers (or external parties in our supply chain) must notify Bradken as soon as possible if they believe or suspect and instance of Modern Slavery has occurred or may occur in future. Contact can be made through their purchasing or procurement representative or by contacting procurement@bradken.com. Alternatively, a Supplier may report their beliefs or suspicions to Bradken Whistle-blower Hotline. Company suppliers may make reports to this hotline either by name or anonymously.

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If a Supplier is unsure about whether a particular act, the treatment of workers more generally, or their working conditions, whether in our business operations, the business operations of the Company supplier, or the supply chains of the Company supplier, constitutes any of the various forms of modern slavery, the Company supplier should raise its concerns with their Bradken contact, via procurement@bradken.com or the Bradken Whistle-blower Hotline as soon as possible.

5.4 Addressing suspected incidents

On receipt of any report of modern slavery instance (either suspected or actual) the Compliance Manager will:

1. Immediately inform ELT of a report being received (with brief description of reported instance)
2. Establish the circumstances behind the report.
3. Contact internal parties (Global Head of Procurement / General Manager People & Culture / General Manager Safety and Sustainability) to notify of alleged instance and to assist in gathering information (where possible)
4. Consider Risk to Victim - in all situations the risk to the victim/s must be of utmost importance in establishing approach. No enquiries should be made with suppliers until it can be certain that the victims' circumstances will not be worsened by such contact.
5. Establish Legal reporting requirements - Modern Slavery is a crime in many jurisdictions and should be reported to the relevant authorities.
6. Consult with external experts where / as required.
7. Prepare a recommendation for action. If Bradken have caused or contributed to the situation, a plan for remediation for the victims is to be included.
8. Submit recommendation and background details to ELT for endorsement.
9. Work with various parties to facilitate implementation of action plan.

Each situation should have individual circumstances and the impact on the victim considered in developing the action plan.

In some instances (where there have been no legal implications) it may be more beneficial to the victim to work with the supplier to improve conditions for employees and to raise awareness of the issues involved.

In other circumstances Bradken may need to cease dealing with the supplier altogether and find alternative sources of supply.

5.5 Assessing effectiveness

The ECC will review on a periodic basis, both actions taken to address Modern Slavery risk and any reported instances to establish effectiveness of approach and any further actions to be implemented.

6 References

Table 1. Reference Table

Number	Name
C00532	Supplier Code of Conduct
C05932	Respecting our Communities

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C00242	Whistleblower Policy
C00640	Ethical Sourcing Policy
Bradken Website	Modern Slavery Statement
R03550	ETI Base Code

7 Revision Summary

Table 2. Revision Summary

Revision	Date Released	Clause/Section Revised	List of Changes	Revision By:	Approved By:
0	14-April-21	Original Release		ipotts	tkitagawa
1	07 Dec 21	Section 5	Addition of ETI Base Code	akotze	tkitagawa