

## Modern Slavery Statement

Apr 2021 – Mar 2022

### Message from our CEO

Celebrating 100 years in operation at the end of this reporting period, Bradken has and continues to impact countless individuals around the world, both directly through employment and indirectly through our supply chains.

Protecting people from Modern Slavery is both a basic expectation and a complex task for a global organisation with a complicated supply chain. At Bradken, we know we are at the beginning of this journey and we are committed to making this a priority today, tomorrow and for years to come. We know there will always be opportunities to improve, and we will strive to find and action them as best we can.

During this reporting period, I have enjoyed seeing Bradken people travel again and take the opportunities to connect with our customers and suppliers in person. Building relationships with suppliers based on thorough processes designed to protect people from harm and mistreatment, commitment to the same values and an open and honest understanding of the issues and risks at hand are the cornerstone of how we operate.

This is no small task, but we are up for the challenge and committed to making a positive difference.

As we build on our foundations from recent years and take confident, practical steps on our journey, I am pleased to present Bradken's third Modern Slavery Statement.

A handwritten signature in black ink, appearing to read 'S. Winstone'.

**Sean Winstone**  
Chief Executive Officer

*This statement has been made with approval of Bradken's Board of Directors and is endorsed on their behalf by Sean Winstone in his role as Chief Executive Officer of Bradken.*

## Reporting Entity and Structure

This statement is made by Bradken Pty Limited (ACN 108 693 009), an Australian Proprietary Company and a wholly owned subsidiary of Hitachi Construction Machinery. As a member of the Hitachi Group, Bradken operates under the Japanese financial year and the current reporting period is 1 April 2021 to 31 March 2022.

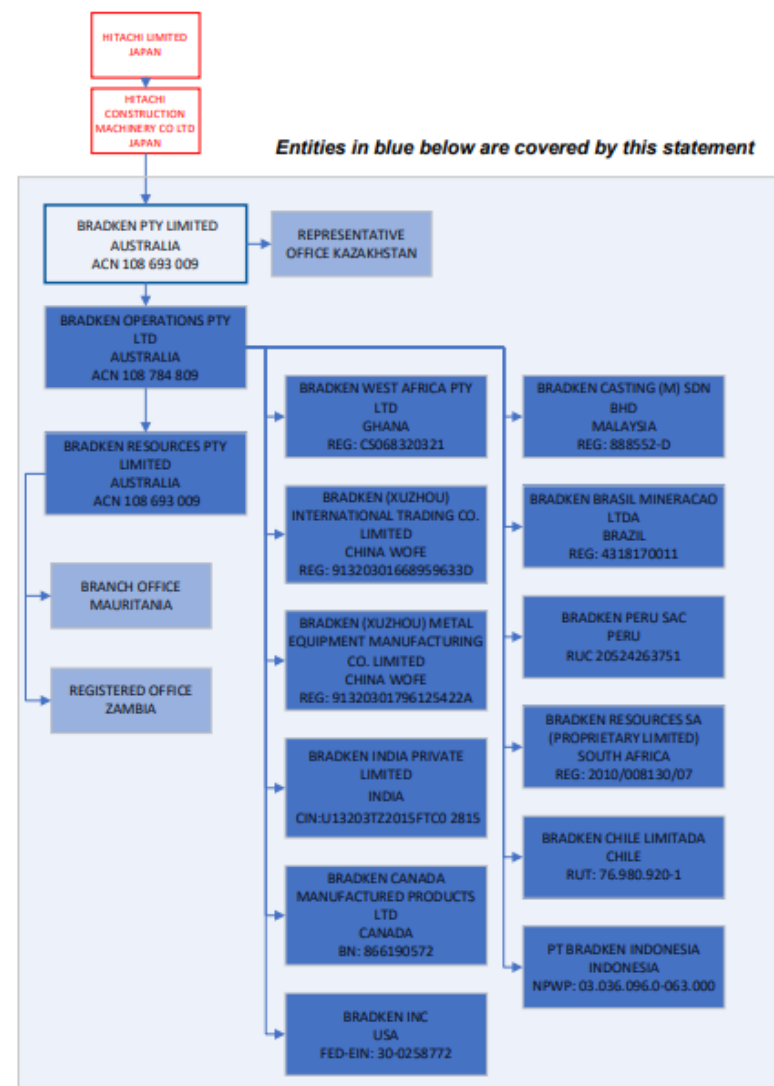
In this statement, the terms 'Bradken', 'us', 'we' and 'our' are intended to include Bradken Pty Limited and all of its wholly owned subsidiaries (as illustrated in Figure 1. Organisation Structure).

Bradken is a global company with our head office in Newcastle, Australia. During the reporting period our operations were structured into specific businesses; Mining Mobile Plant, Mineral Processing and Specialty Products, each dedicated to meeting the needs of the industry sectors they serve.

While the subsidiaries of Bradken Pty Limited are separate legal entities, they operate collectively under a matrix structure as 'One Bradken', sharing one Executive Leadership Team and centre led functions for: Human Resources, Legal, Safety and Sustainability, Product Development, Sales, Quality, Continuous Improvement, Communications, Corporate Finance, Supply Chain and Procurement with all corporate policies and procedures applying to all Bradken entities.

There were no changes to the legal structure of the reporting entities during the reporting period.

**Figure 1 – Organisation Structure**



## Our Business

Bradken is a solutions provider primarily for the global mining sector, backed by extensive in-house engineering and manufacturing capabilities, with foundries, fabrication and machine shops, sales and corporate offices located around the world. We work mainly with mining companies, helping them overcome operational challenges with innovative solutions across their value chain; predominately wear parts for mobile plant, fixed assets and mineral processing applications.

The core production activity within our foundries is melting and pouring metals to produce castings. Fabrication, welding and assembly of castings and repairs and maintenance on machinery and equipment are undertaken in our Fabrication and Machine Shops. As mining customers evolve, we continually strive to meet their needs with investment in Product Development, Research and Development, and Innovation - we know our customers are looking for smarter, more intelligent ways to run their operations, incorporating the latest in technology and digital IoT solutions. Our focus on Research and Development supports the exploration of product and service developments in this space to develop market inspired, future focused solutions.

As a socially responsible organisation, Bradken demonstrates concern for the wellbeing of people and communities. We conduct business fairly and ethically, we respect human rights, comply with all laws and regulations and follow a rigorous Code of Conduct.

## Locations

Bradken has manufacturing facilities located in Australia, Canada, United States, India, China and Malaysia. We have corporate offices in Newcastle and Brisbane, Australia, and Kansas City, United States. To be close to our customers to support their needs, we also have smaller sales offices in many different regions.



**Figure 2 - Bradken's Global Footprint**

## Our People

At Bradken we believe people are our greatest asset and keeping them safe and healthy both physically and mentally is our top priority. From our Executive Leadership Team through to individual employees working on site, we are committed to the health and wellbeing of all our people.

We are committed to providing a diverse, inclusive, engaging and flexible environment because we believe that great things happen when individuals are given the opportunity to bring themselves into their work. We believe everyone has the right to feel safe, included, valued and respected, and empower our people to be courageous in addressing any situation that compromises that. Bradken reinforces this, not only through our codes of conduct and other policies but also with a number of initiatives to address Employee Safety and Wellbeing such as: the Rules We Live By for addressing critical safety risks, monthly Team Safe discussions for all employees, our Inclusion and Diversity program and access for all employees to our Employee Assistance program.

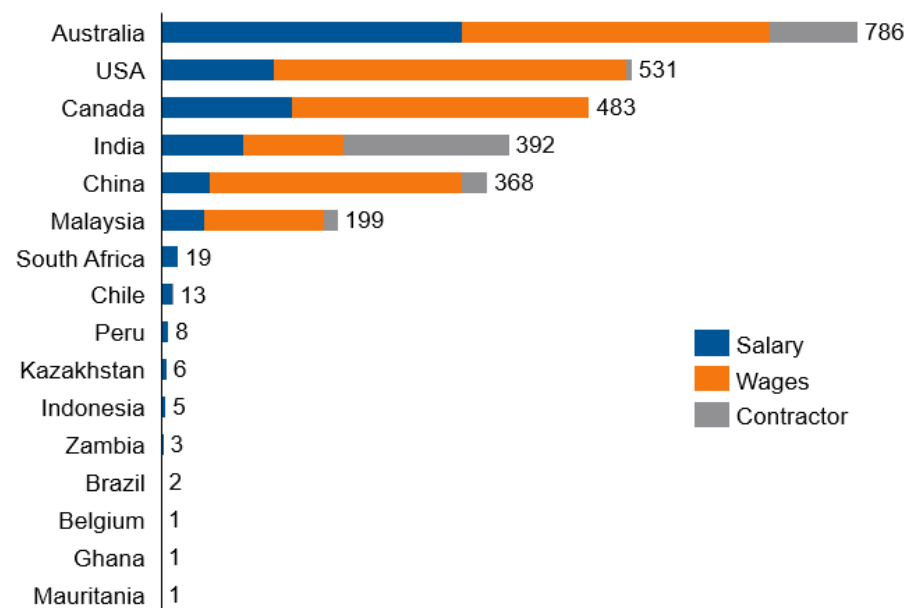
Our goal is to provide:

- a safe and healthy work environment
- practical tools and techniques for the assessment and consideration of health and wellbeing issues
- access to expertise and resources to implement and maintain our health and wellbeing policies, standards and procedures

As at March 2022, Bradken employed 2,818 people globally with most of these based in Australia and North America. Shopfloor team members, who are paid through wages, represent the majority of our overall employee numbers at 57%, with salaried team members at 31%. To meet varying production requirements, temporary production labour (through labour hire companies) is also used (mainly within Australia, China and India) and at March 2022 made up 12% of total employee numbers globally.

Female employees made up 9.2% of our total salary and wages team members. This represents an increase of almost 0.8% in our Female team members from last year, thanks to the introduction during the year of an ongoing program focused on Inclusion and Diversity throughout our business.

**Figure 3 - Employee Numbers/Types Globally**



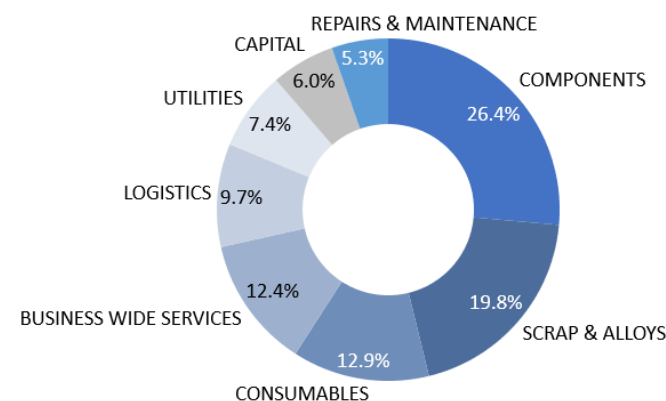
## Our Supply Chain

Given the geographic reach of our operations, identifying Modern Slavery in our supply chain is a challenge. Despite this challenge, we are committed to continually improving our own processes and practices internally, and how we work with our suppliers to meet our moral and ethical obligation to combat Modern Slavery. We want to make sure we do not cause or contribute to Modern Slavery or are linked with instances of Modern Slavery through our interactions.

At the end of March 2022 Bradken's supply chain included 5,056 active suppliers globally (those we purchase goods and services directly from). Bradken has been working to reduce our number of active suppliers. The Procurement team works to consolidate spend under Supplier Agreements (contracts) reducing the volume of suppliers we deal with and improving the relationships and communication we have with them. We undertake regular, periodical reviews and deactivation of dormant suppliers in our system. These ongoing efforts have resulted in an almost 19% reduction on the number of active suppliers compared to 2021.

Approximately 71% of Bradken spend during the reporting period was on Components, Consumables, Scrap and Alloys, and Business Wide Services, with the balance being under Logistics, Repairs & Maintenance, Utilities and Capital Expense categories. Figure 4 shows the breakdown of spend and Figure 5 lists the types of products and services we purchase in these spend categories.

**Figure 4 – Spend Breakdown by Category**



**Figure 5 – Main Products and Services Purchased.**

Category	Products / Services
<b>Components</b>	Forging and castings, steel plate, steel bars, bolts, pins, ceramic tiles, and machining services and outsourcing services that go into producing finished castings
<b>Scrap and Alloys</b>	Various metals (either produced from raw materials or sourced from scrap materials) that are used in the melting process to manufacture our castings
<b>Consumables</b>	Catalysts and binders, ceramic shapes, sands, graphite electrodes, grinding media, welding materials, paints and washes; refractories, thermocouples and timber that are used as part of the process of manufacturing castings
<b>Business Wide Services</b>	Equipment rental, printing and stationery, travel and entertainment, personal protective equipment, testing services, cleaning and gardening, clothing (uniforms), computer software and hardware and temporary personnel services



## Modern Slavery Risks

In considering our Modern Slavery Risk, Bradken refers to Guidance for Reporting Entities issued by the Department of Home Affairs, as well as the research, recommendations and risk factors outlined in the below publications:

- Global Slavery Index 2018, Minderoo Foundation's Walk Free initiative
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition OECD (2016)

### Sector and Industry Risk Considerations

Bradken is one of the world's leading solutions providers for mining equipment parts. We specialise in the innovative design and manufacture of product and service solutions for the mining and resources sector, and we also expertly serve rail and transit, energy, structural and industrial casting and defence markets. While we supply to the mining sector, Bradken does not directly operate in the extractives sector itself or in any of the other sectors which are generally recognised as at high risk for Modern Slavery due to their characteristics, products and processes (i.e., textiles and fashion, fishing, electronics, cleaning, and agriculture).

### Products and Services Risk Considerations

The core raw materials and inputs to our manufacturing (the products we spend the most on) are not products considered high risk according to the Global Slavery Index. However, Bradken has identified some products and services which we purchase as potentially at risk of Modern Slavery. Our initial engagement was with suppliers of these items (listed in Figure 6) to raise awareness and to verify Modern Slavery practices are not occurring in their operations. It should be noted that most of the items are purchased in limited amounts and don't have a significant spend, therefore Bradken's ability to influence in this area is limited.

One area identified as a potential risk, where we can have a significant impact, is in the outsourcing of our product manufacture – refer to our Actions taken to Address Modern Slavery Risk section to see what we're doing in this space.

**Figure 6 – High Risk Products / Services Identified**

Product Service /	Usage
Outsourcing of Manufacturing	varying market demand has led to increased requirement to outsource production of selected castings and components
Temporary Labour Personnel	engaged at our sites through recruitment agencies
Cleaning Services	engaged at our sites and offices which may employ low skilled or migrant workers
Refractory Bricks	used for lining our furnaces
PPE /Garments	Personal protective equipment (masks/gloves etc) corporate uniforms and protective clothing (pants and shirts) for shopfloor workers (and the cotton contained in these garments)
Timber	used in making moulds for castings and purchased indirectly in the form of pallets and other packaging
Rubber	used as a backing material on wear plates for chutes and mill liners manufactured
Electronics	laptops, computers, & mobile phones and other electronic equipment purchased for use within our business
Tungsten	(in small quantities) purchased either in components or purchased for application to castings wear faces to increase hardness and durability

## Migrant Workers

Bradken employs a small number of migrant workers on a long-standing basis in our Malaysian facility. This cohort of workers have been with us since around 2019 and began their employment in the very early stages of Bradken building its awareness of its Modern Slavery Risk. Late in the reporting period, Bradken allowed a third-party to conduct an audit of our Malaysian facility. As part of the audit, some of these workers indicated they had been charged fees by the external recruitment agency who engaged them in 2019. Bradken is investigating with the intent to rectify this matter by establishing the situation and repaying any fees that were charged to the employees in question. Our Compliance Manager is currently working with our People & Culture team to further strengthen our policies and procedures around recruitment to ensure this does not occur again.

## Geographical Risk Considerations

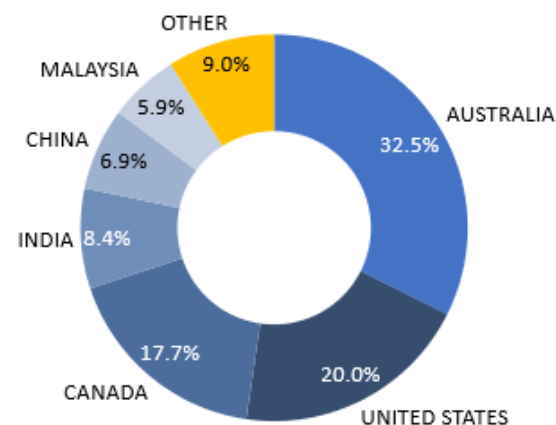
Bradken recognises that Mauritania has a high vulnerability to Modern Slavery (based on the Global Slavery Index). Bradken maintains a Branch Office of Bradken Resources Pty Ltd, which provides a legal presence in Mauritania to support one of our key customers. Bradken has one salaried employee in Mauritania who is there to meet our customer's requirements regarding Bradken products (produced in other regions) on their site. Given the employee is protected by our global procedures and policies, and there is no actual facility or supply chain for this legal entity we consider the risk of Modern Slavery in this situation to be low. If the Branch Office were to expand in the future, to develop an actual physical presence, with increased employee numbers or to develop a local supply chain we recognise the need to implement further due diligence based on the risk factors of the geographic location.

Apart from the situation outlined above, Bradken does not currently operate or have any first-tier suppliers in the countries with the highest prevalence of Modern Slavery based on Global Slavery Index (North Korea, Eritrea, Burundi, the Central African Republic, Afghanistan, Mauritania, South Sudan, Pakistan, Cambodia, Iran, Syria, Chad, Democratic Republic of the Congo, Iraq, Yemen, Somalia, Sudan and

South Sudan). We recognise that there is the possibility that suppliers further down our supply chain could be connected to these countries and also that the risk of modern slavery is not limited to these countries and still exists in other highly developed and higher income countries.

We currently have active suppliers based in 39 different countries globally but 70% of our suppliers are located in Australia, Canada and the United States (where our biggest operations are based), 21% in India, China and Malaysia supplying locally to our operations there, and only 9% in other regions.

**Figure 7 – Supplier locations globally**



According to Global Slavery Index, the Asia Pacific region has a high prevalence of Forced Labour, and this is considered in our assessment of risks for our operations in India, China, Malaysia and Indonesia. We know that our workers in our own operations are protected and have grievance mechanisms for reporting, and we do not operate in any high-risk sectors, but our operations in the Asia Pacific region do source products and services locally and there is the potential that instances of Modern Slavery may be present in these local supply chains, given the regions they operate in. Our focus for our actions has been, and will continue to be, in these regions in order to best address potential risk.

## Actions taken to Assess and Address Modern Slavery Risk

Building on previous years actions, Bradken has undertaken a number of initiatives during the reporting period to address the potential risk of Modern Slavery.

### Supplier Questionnaires

Bradken engaged Centrl as the provider of an online platform for our Procurement team to use for distributing and assessing supplier questionnaires on risk for Modern Slavery. The platform has a standardised questionnaire developed by subject matter experts that considers suppliers practices, policies and procedures in regard to Modern Slavery as well as potential exposure through their supply chains and interactions with suppliers. Questionnaires were sent out during the year to a range of suppliers globally based on products, services or regions that could be considered at high risk for Modern Slavery.

Questionnaire responses were received from 125 suppliers. These were automatically scored by the platform, and then reviewed by Procurement team members to follow up on any concerns or clarifications and to confirm final risk scoring.

The scoring methodology is set up to consider not only supplier's actions and practices regarding Modern Slavery but also how proactive suppliers are and their level of awareness and incorporation of Modern Slavery Risk into their processes and procedure. Because of this, the majority of responding suppliers (80%) fell into in the medium risk range

Analysis of the responses and scoring indicates responding suppliers:

- advise they are not engaging in any at risk practices themselves
- confirm they are not aware of any Modern Slavery in their supply chains

- confirmed they do not have any suppliers in high-risk regions (with one exception):
  - One supplier has a manufacturer in Pakistan (considered high risk country). We purchase leather gloves from them in minimal quantities. Our supplier confirmed they purchase directly from the manufacturer and their representatives visit the factory regularly, there are policies in place to ensure no forced work or child labour and that acceptable working conditions are provided. We consider this low risk but conduct ongoing Supplier Relationship Management meetings with this supplier to maintain visibility of the situation
- may not yet have implemented policies or procedures to cover Modern Slavery
- in some cases, are sole traders or small to medium enterprises who may not necessarily have the same level of corporate policies in place as larger organisations
- in many cases were in regions where the concept of Modern Slavery is still an emerging topic and they have not previously been aware of the issue



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### **What's next?**

*Our first round of supplier questionnaires has given us some insight into the level of awareness and potential risks for a selection of our suppliers (identified as high-risk products, services or regions) and confirmed that sending the questionnaires is raising awareness of Modern Slavery issues. It has also highlighted the level of resources required to continue to raise awareness and obtain information from our suppliers, especially given the number of suppliers we have.*

*To resolve this, in the next reporting period we'll be engaging Centrl under a Managed Services agreement basis. Centrl will have dedicated personnel to distribute, review, score and follow up on clarifications on behalf of Bradken. This will enable us to reach a greater number of suppliers to increase awareness and assess risk – we have set a target of 1000 per year with our first years focus on the Asia Pacific region. This also allows our procurement team to focus on working closely with the suppliers where we can have the most impact, through site visits and supplier relationship management meetings.*

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### **Supplier Code of Conduct - Mandatory Agreement**

During previous reporting periods Bradken introduced a Supplier Code of Conduct which was communicated to new suppliers via email. The Code of Conduct sets out Bradken's expectations of suppliers for areas such as ethical standards and behaviours, compliance with laws, health, safety and environment, treatment of employees and covers Modern Slavery and prohibits use of forced or child labour. During the current reporting period we updated our supplier onboarding process to a digital platform, the Bradken Supply Hub. This enabled us to provide a copy of the Supplier Code of Conduct to potential suppliers during their online registration process requiring them to confirm agreement to abide by it before they are approved as an active supplier.

### **Review of Processes and Policies on Engaging Migrant Workers**

Work to address the aforementioned concerns in Malaysia is ongoing and we expect significant movement on this by the end of the next reporting period.

### **Annual Training**

Our second round of annual employee training on Modern Slavery issues and risks was undertaken in January 2022. The training was developed in house and delivered via our online Learning Management System. This year, we extended to the training, from English only materials, to also include Simplified Chinese and French, to enable more of our people to develop an understanding of the topic. All employees with a company email address were enrolled to participate in the training and we reached an 85% completion rate. This represents 1020 team members, across all functions globally, having been trained in Modern Slavery Awareness, which is twice the reach of last year's training.

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### **What's next?**

*In the coming year we intend on further raising awareness of Modern Slavery issues throughout our business via repeat of the annual training as well as toolbox talks and site posters to reach our shop floor employees. All new employees will receive the training when they are assigned a Bradken email address.*

*We also plan on developing awareness materials that we can share with our suppliers, to increase awareness in our global supply chain.*

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## Supplier Site Visits / Audits

Supplier site visits to undertake Modern Slavery audits have been part of our plan to address Modern Slavery for the last few years but up until now we have been unable to action due to travel restrictions related to the COVID-19 pandemic. This year we were pleased to have started visits to suppliers to talk with them face to face about the risks of Modern Slavery in our (and their) supply chain and to view their premises and talk to their workers firsthand. While there were no red flags for Modern Slavery at the suppliers we visited, we took the opportunity to review their premises from a safety perspective as well, providing improvement recommendations for housekeeping and employee wellbeing.

These visits highlighted that there is still only emerging awareness of Modern Slavery as an issue in many regions we operate in. However, discussions were received very positively by our suppliers who were keen to cooperate to address the issues. It is clear these visits are a worthwhile action in building relationships and raising awareness of risk of Modern Slavery amongst our suppliers.

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### What's next?

*Supplier site visits for Modern Slavery audits will continue to be part of our actions to address Modern Slavery risk. Our Procurement team has a target of undertaking at least 24 site visits during the next reporting period as part of team members personal KPI goals as we can see the value in these visits as an opportunity to build relationships with our suppliers while raising awareness of issues.*

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**Procurement Business Partner, Senthil Balakrishnan, undertaking one of Bradken's first Supplier Modern Slavery Audits**



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### **Supplier Site Visit / Modern Slavery Audit**

*As part of efforts to assess risk and raise awareness in our Supply Chain Bradken reps make site visits, including to a ceramics manufacturing facility based in India.*

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While the topic of Modern Slavery was new to our supplier, they demonstrated an openness to learning about the issues and allowed access to their facilities. During our visit we were given the opportunity to speak with both management and employees.



We observed:

- the facility was well maintained
- there were safety practices in place
- all employees using appropriate PPE
- access to first aid supplies
- there appeared to be a good relationship between Management and employees and
- there were no indicators of Modern Slavery

There were some recommendations provided to the supplier to improve general housekeeping practices and to improve employee access to drinking water, to which they have demonstrated a commitment to improve as shown in the before and after shots below.

#### **During Site Visit**



#### **Improvements after Site Visit**



#### **Installation of improved drinking water facilities for employees**



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## Management of Outsourcing Risk

Bradken has an increasing need to outsource components and castings manufacturing as we establish a supply base in India. We've recognised that as this is one of our largest areas of spend in the products and services identified as at risk, this is an area we have the ability to influence.

Bradken takes a balanced position when choosing outsourcing suppliers, and consideration of commercial, technical, safety, quality, corporate social responsibility (CSR), and sustainability factors all play a part. Bradken wants to work with good corporate citizens who share our values, so our due diligence processes for new outsourcing suppliers in India look at not just the supplier's own operations, but also the CSR activities which they are proactively engaged in or contributing to. We understand that investing in the local community and putting money back into education helps provide opportunities and can break the cycle of poverty, creating better family wealth which, in turn, reduces risk of Modern Slavery. The level of contribution to their local community is an influencing factor into our decision to partner with a supplier or not.

We have a Product Sourcing team who identify and engage suppliers in India to support our manufacturing process, using a rigorous review of potential suppliers to meet our outsourcing needs.

Bradken engages a third party in India to undertake preliminary due diligence on potential outsourcing suppliers on our behalf. An initial desktop review is conducted, and a recommended short list presented to the Product Sourcing team. Following Bradken's approval, the third party undertakes physical site visits. The purpose of these initial visits is to assess capability and capacity but also to perform inspections of the working conditions of the supplier's foundry with consideration to employee conditions, safety and Modern Slavery red flags. A SWOT analysis is undertaken on the whole operation to highlight weaknesses or potential issues with regards to the supplier's practices and to provide recommendations on improvements required to develop a partnership

with Bradken. The supplier's willingness to cooperate with initial recommendations is a good indicator of a positive approach to our potential working relationship and a reduction in the risk of Modern Slavery occurring.

All suppliers who pass the preliminary site visit from the third party are then visited by Bradken personnel to verify their suitability before we consider entering into a supply agreement with them. At this stage there is an opportunity to:

- View progress of implementation of any recommendations from the third party
- Undertake further screening including analysis of financial reports, and review of wages and salaries data to ensure proper legal wages are being paid to workers
- Require completion and discussion of Modern Slavery questionnaire
- Reinforce Bradken's expectations of Corporate Social Responsibility including Supplier Code of Conduct
- Consider the supplier's own Corporate Social Responsibility efforts and engagement with their community

**Bradken  
Product  
Sourcing  
Team  
pictured  
with one of  
our partner  
suppliers**

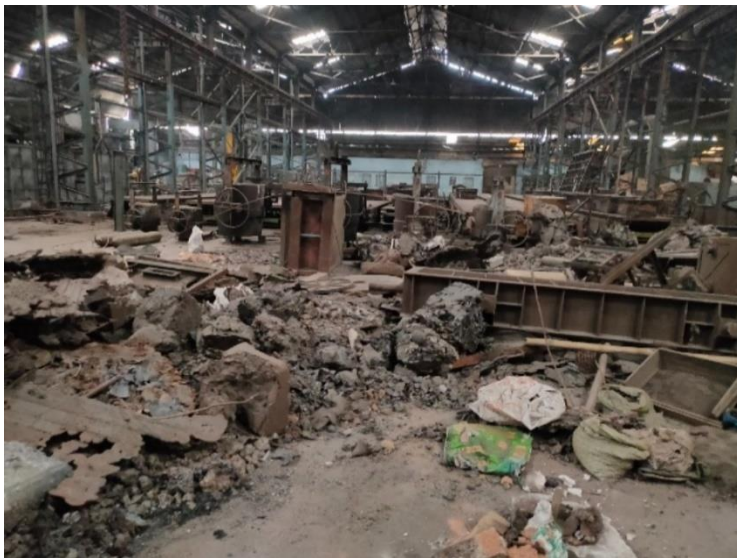


### ***Outsourcing Due Diligence Process –***

*These pictures are from a supplier based in India that was visited as part of our due diligence process for outsourcing suppliers. The shot below is of the site at the time of the preliminary third-party visit. Recommendations were given to increase housekeeping and improve overall employee safety.*

*The shots on the right are taken at the time of the Bradken personnel visit and show the efforts of the supplier to improve conditions - the foundry is now organised and cleaner with rubbish bins introduced, there is clear access to emergency exits and site signage for safety has been implemented.*

**Shop floor during initial third party visit**



**Improvements demonstrated during Bradken's visit**





## Supporting the Communities where we Live and Work

At Bradken, we recognise that Modern Slavery is a deeply gendered issue with an estimated 71% of victims likely to be women and girls. We also recognise the role companies like ours can play in supporting the communities in which we operate, and we demonstrate our commitment to playing our part to empower young girls through educational partnerships with organisations in Peru, India and Australia.

Through these partnerships we provide opportunities for young women to engage with Science, Technology, Engineering, the Arts and Mathematics in a meaningful way so they can learn and develop their skills and ultimately use them to make a difference in their community and in their own lives.



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## Partnering with PUTHRI

*PUTHRI is India's first developmental project that seeks to create career intentionality amongst underprivileged female students, studying at corporate or government schools, between the ages of 13 and 18 years old.*

*It is an initiative by AVTAR Human Capital Trust (AHCT), a not for-profit public charitable organisation, headquartered in Chennai.*

*Bradken's partnership with Puthri began in 2019 when we signed a five-year agreement (2020-2025) to sponsor 100 girls between grades 8 to 12 at the Government Higher Secondary School, Chettipalayam, located just 4 kilometres from our foundry and manufacturing facility in Coimbatore, Tamil Nadu.*

*The purpose of the program is to assist girls in understanding their own capabilities, encourage them to stay in school and maintain their studies, and help them build meaningful relationships and developing the necessary skills to have a successful career.*

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## HunterWiSE Sponsorship

*In 2021 Bradken partnered with HunterWiSE – through the University of Newcastle (UoN) - to help support future generations of female STEM professionals through their High School Outreach program.*

*Run over 10-12 weeks the HunterWiSE program provides female Year 8 students, from schools across the New South Wales Hunter region in Australia, the opportunity to work alongside STEM academics and student mentors from the University and engage with industry sponsors to identify and come up with creative solutions for local community issues whilst developing their STEM skills.*

*Bradken was proud to sponsor Lambton High School in our first year participating in the program and hosted a group of students, their teacher and UoN mentors for a day of learning and inspiration in the Innovation Centre at our Newcastle office.*

*The visit took the group on the journey of our products, from design and product development to materials and seeing the parts in an operational setting, albeit virtually through a VR experience. The girls were also given the opportunity to engage with a few of our young female engineers and ask them questions about their experience having a career in STEM.*

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### **STEAM Girls Monquegua**

*Created in partnership with local organisation City Makers, strategic partner Peru - Anglo American and run through the Santa Fortunata school in Moquegua, this program joins others we support around the world in providing opportunities for school aged girls to engage with STEM subjects in a meaningful way so they can learn and develop their skills and ultimately use them to make a difference in their communities.*

*STEAM Girls Moquegua has been created as an after-school program to be run at select schools in the city of Moquegua, in Southern Peru, and aims to provide enhanced learning experiences for high school aged girls in the fields of Science, Technology, Engineering, the Arts and Mathematics (STEAM).*

*Infrastructure setup at the participating schools, including local educator recruitment, internet accessibility and program finalisation, was completed during this year's reporting period, with the program planned to start in line with the regular school year, from March 2022 - funded by Bradken and run by City Makers.*

*Our team met the first group of students to participate in the program (28 girls aged between 12 and 14) at the launch event and presented them with new backpacks to help them carry around all the STEAM information they'll undoubtedly gather over the course of their learning.*

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*Bradken is committed to supporting the communities in which we and our customers operate through our chosen focus areas of health, environment and education, and in particular STEM-based educational programs for young women. Learn more about the STEAM programs we support here: <https://lnkd.in/g/SMr9x>*

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## Supporting our Communities during COVID-19

*The surge in cases of COVID-19 in India around May 2021 put a huge strain on the availability of medical oxygen across the country, so much so that the Indian Government redirected most of the country's supply of industrial oxygen toward the health care system. Anticipating this reallocation of resources, the Bradken team in Coimbatore (the town where our foundry is located) began trialling the use of alternative methods for cutting scrap metal, including arc gouging - a process which does not require oxygen. By the time the oxygen shortage eventuated, the team had a good understanding of what could be achieved with other methods, had developed procedures and trained operators to ensure a smooth transition to the new process. Unfortunately, Coimbatore, was one of the worst COVID-affected districts in the Tamil Nadu region at the time, with local hospitals and medical facilities unable to cope with patient demand.*

*Additional COVID care infrastructures were built in various locations to help care for those in need including at the Government primary health centre near our site.*

*To help support the local community, Bradken donated essential supplies to the pop-up clinic including a diesel generator, two water purifiers, 10 pedestal fans, 100 chairs and a vehicle to be used for patient transport.*



## Vaccination clinics

As the COVID-19 pandemic continued to put the health and wellbeing of our people at risk during 2021, Bradken did its best support team members in outbreak areas who were wanting to be vaccinated but who may not have had easy access. Understanding that vaccination protected our people, our business and the communities we operate in, vaccination clinics were arranged in some of the worst affected regions.



## Coimbatore India

*In late May 2021, the Bradken team in Coimbatore, India rallied to arrange on-site first round COVID-19 vaccinations for more than 200 employees, following the devastating outbreak of the Delta variant in the region.*

*Confirmation for the vaccines to be administered at site was received by the Bradken team late on a Saturday night and by 10am the next day, they had put the necessary infrastructure and safety precautions in place for the program to begin.*

*A total of 44 employees at the site were fully vaccinated with both doses and another 250 were on track to receive their second vaccination by the end of August. Coimbatore was one of the worst-hit districts in the Tamil Nadu region of India with a surge of COVID-19 cases resulting in an acute shortage of beds and medical oxygen supply in all private and government hospitals, and patients waiting in long queues outside.*

*In addition to vaccinations, Bradken established an in-house treatment clinic at our Coimbatore site during the peak of the recent outbreak, with beds and oxygen, and our own nursing staff provided the necessary care. Medication and food were also provided to employees and family members in need.*



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### Merlimau, Malaysia

*By early November 2021 87% of employees at our site in Merlimau, Malaysia had received a COVID-19 vaccination (either one or both doses) following Bradken's efforts to be included in a government vaccination program for the Malaysian manufacturing sector.*

*On 5 August, 169 Bradken team members from the site, as well as site security personnel and cleaning staff, were taken to receive their first dose of the vaccine.*

*Merlimau Site Manager Jeyaganesh Sanmuganathan said that many of his team members had struggled to get access to the vaccine and were appreciative of Bradken's help in getting it.*

*"Cases [of COVID-19] in Malaysia have risen to alarming levels, recording close to 20,000 positive cases a day and high number of casualties," Jeyaganesh said.*

*"Many of us have either lost someone close, or know people who were affected, and the sufferings which came along. With a lot of uncertainties and risks associated with the virus, being vaccinated is the only logical thing to do, to safeguard ourselves and our loved ones. We appreciate the fact that most of our employees believe the same."*

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### London, Canada

*In July 2021, a COVID-19 vaccination clinic was held at our site in London, Canada where employees, their families and friends were invited to voluntarily roll up their sleeves and get vaccinated. Participation in the clinic was excellent, with about 60 vaccines distributed. The site's vaccination rate now sits at close to 90% of team members having had both doses – an important achievement not just for those individuals, but for Bradken and the wider London community.*

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## Assessing the Effectiveness of our Actions

Modern Slavery is an ongoing agenda item in Bradken's Export Control Committee (ECC) meetings to ensure executive level involvement and oversight of the actions being taken to address Modern Slavery issues and the effectiveness of these actions. The Committee meets quarterly and includes representatives from our Executive Leadership Team, Governance and Compliance, Legal Counsel, Supply Chain, Sales and Procurement functions, who review Modern Slavery actions and issues on a regular and ongoing basis.

The ECC oversee the monitoring of the effectiveness of our actions via a number of performance measures as listed below.

### Percentage of awareness training completed, and number of employees reached

Internal awareness training on Modern Slavery risks is an ongoing annual requirement for our employees. Our first year of training saw 74% completion rate representing just over 500 employees trained. With this year's training being provided in French and Simplified Chinese as well as English and a greater number of employees enrolled, we saw an increased completion rate of 85% representing 1020 employees reached, which is double the number of employees completing the training in comparison to last year.

### Ongoing Supplier Questionnaire Responses

The number of suppliers we are able to reach via Supplier Questionnaires, as well as the risk rating of suppliers and issues addressed will be monitored and reported to the ECC as a measure of effectiveness of our actions. With the introduction of managed services via Centrl in the coming reporting period we expect this number of suppliers to significantly increase.

### Onsite Modern Slavery Audits / Supplier Visits

With COVID-19 restrictions easing and travel being allowed again we're able to undertake physical visits to our suppliers to conduct Modern Slavery Audits. We've set a target of 24 Modern Slavery Audits for the

coming reporting period and the progress and outcome of these will be reported to the ECC.

### The number of cases reported / identified / remediated

Under Bradken's Whistleblower Policy, employees and any other parties, acting in good faith, can confidentially report any behaviour that is believed to be: dishonest; fraudulent; corrupt; illegal; in breach of legislation; unethical and any other serious improper behaviour or unsafe work practice. Access to the Bradken whistleblower facility is available for both employees and external parties to report activity inconsistent with worker welfare standards, without fear of retaliation. Details of the whistleblower policy are provided to employees on induction and published on our intranet. They are also published on our website and included in the 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.

Our Addressing Modern Slavery Risk procedure sets out our approach to dealing with suspected or actual cases of Modern Slavery.

During the current reporting period there were eight whistleblower matters raised by internal, external and anonymous parties. All instances were followed up and investigated. Two were substantiated and resulted in disciplinary action. One was not substantiated, but improvement actions were noted. The remainder were not substantiated.

One matter reported by one of our employees related to concerns that a cleaner, engaged by a labour hire provided, had indicated they had not been paid for a period of time. The allegation was investigated by Bradken Compliance Manager in line with our Addressing Modern Slavery Risk Procedure and found to be an administrative lapse by the supplier with none of the elements of force or coercion associated with Modern Slavery. The supplier quickly resolved the issue and paid the outstanding wages. The situation has been monitored on an ongoing

basis with no repeat occurrence. Apart from this instance none of the whistleblower reports were related to Modern Slavery.

### Consultation with Subsidiaries

The legal entities covered by this statement operate as 'One Bradken', and the policies, approaches and actions outlined in this statement apply to all. Bradken's centre led functions of People and Culture, Safety and Sustainability, Legal and Procurement have all worked collaboratively with our Sales teams in Bradken's efforts to address Modern Slavery risks and all relevant functions provided contributions to the preparation of this statement.

### Additional Information

#### Impacts of COVID-19

This reporting period saw significantly less impact of COVID-19 to our operations in comparison to last year where site closures resulted in a significant amount of production days being lost. This year the longest shutdowns occurred at our London, Canada foundry for a period of 14 consecutive days in both May and June/July 2021, and at our Xuzhou, China foundry for a period of 12 days from the end of March 2022. In addition, some other sites had minor shutdowns lasting no more than a few days each. During these periods of shutdown employees were able to use either special paid leave, sick leave or annual/vacation leave depending on their individual circumstance. Many of our people, in roles that don't require attendance at site have been able to continue to work remotely when there have been instances of COVID-19.

## Conclusion

*In 2022 Bradken celebrates 100 years of operation. During this time, we've seen significant change. We have and will continue to respond by transforming and adapting our business to ensure we lead in providing innovative solutions for our customers, while building our support for the global community along the way. We continue to review and assess our operations, procurement, manufacturing, social responsibility and sales activities to make sure human rights issues are addressed and the welfare of workers in our supply chains is protected.*

## Appendix

### Addressing the Mandatory Criteria set out in the Act

Mandatory Criteria	Relevant Page Number
a) Identify the reporting entity	Page 2
b) Describe the reporting entity's structure, operations and supply chains.	Page 2 - 5
c) Describe the risks of Modern Slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Page 6 - 7
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Page 8 - 16
e) Describe how the reporting entity assesses the effectiveness of these actions.	Page 20 - 21
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Page 21
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant (optional)	Page 17 – 19, 21