

Modern Slavery Report FY23

This Report is made by **Barminco Mining Services Canada Limited** ("Barminco Canada") under the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, (S.C. 2023, c. 9) ("Canadian Supply Chains Act") for the financial year commencing 1 July 2022 and ending 30 June 2023 ("FY23").

This Report is Barminco Canada's first filed in Canada, and details the steps it has taken in FY23 to assess modern slavery risks within its operations, inclusive of its supply chain, and the actions being taken to help manage these risks.

The Company is a subsidiary of Perenti Limited (ACN 009 211 474) ("Perenti"), incorporated in Australia. Perenti's previous modern slavery statements under the Australian Modern Slavery Act 2018 (Cth) can be found on the Australian Modern Slavery Register [here](#).

Our company

Barminco Canada is part of the Perenti group of companies ("Group"). Perenti is a diversified global mining services group incorporated in Australia and listed on the Australian Securities Exchange (ASX: PRN). Headquartered in Perth, Australia, Perenti is today one of the world's largest mining service companies providing surface and underground mining at scale.

Perenti's portfolio consists of sustainable, inter-related and value-adding mining services and technology focused businesses. Perenti currently has operations and offices in 13 countries, and a workforce of ~11,000 people primarily in Australia and Africa. Barminco Canada services two mine sites in Canada with a workforce of around 330 personnel.

Perenti is comprised of four divisions: Contract Mining, Drilling Services, Mining Services and idoba. Barminco Canada sits within Perenti's Contract Mining Division. These divisions are supported by Perenti's corporate centre, which is responsible for supporting and enhancing the long-term success of the Group by ensuring development of current and future Perenti leaders, investing capital to deliver future growth, governance on high-risk areas, promoting our brand and safeguarding our reputation. Further information on Perenti's organisational structure can be found on Perenti's website [here](#).

Perenti's organisational structure



We are one of the world's largest mining contractors with demonstrated industry-leading expertise in surface drilling and hard-rock surface and underground mining.

We are one of the world's largest drilling services contractors globally with the experience to drill the deepest and most complex holes in the mining and exploration industries.

We are a portfolio of specialised, lower capital intensity businesses who predominantly work with clients across the mining sector, to deliver value-add services that meet current and emerging needs.

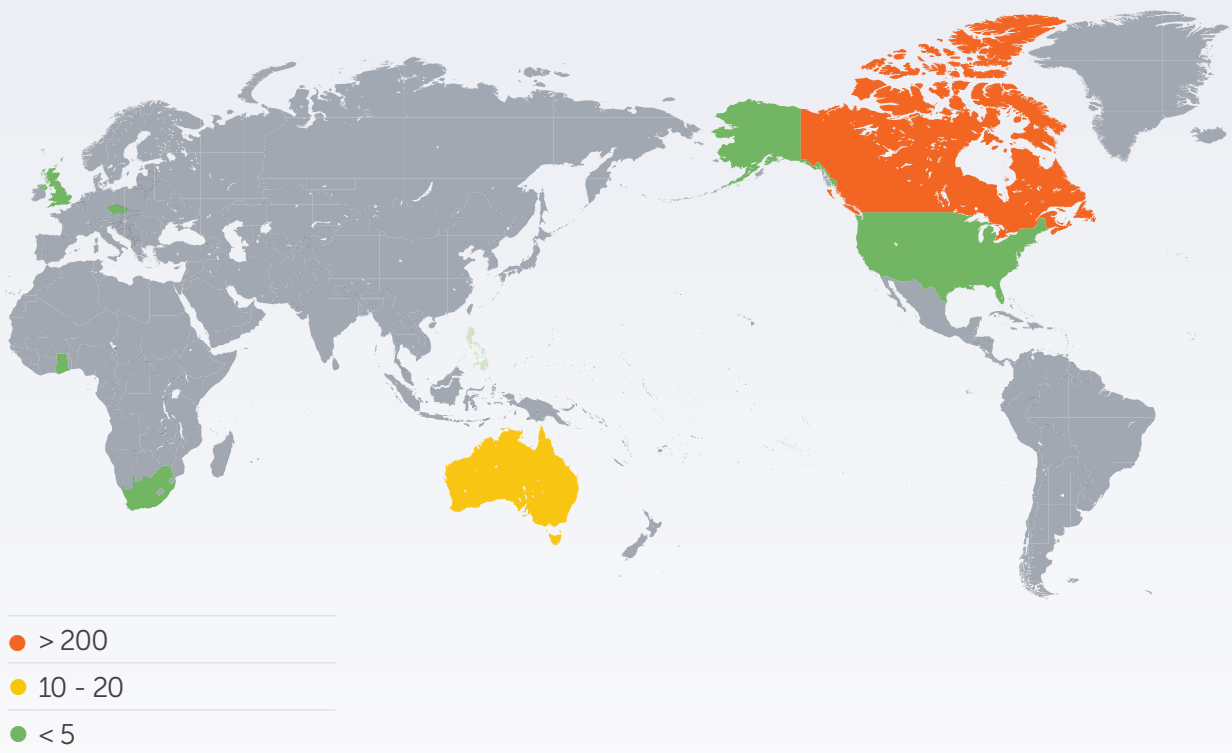
We are a technology informed services and products business who provide unique end to end digital, technology and consulting services designed to rethink, transform and disrupt the mining industry and beyond.



Our supply chain

In FY23 Barmingo Canada had about 250 active suppliers across eight countries. The suppliers Barmingo Canada deals with directly (Tier 1) are located in Canada (90%), Australia (5%), United Kingdom (1%), United States (1%), and South Africa, Ghana, Czech Republic and the Philippines (each <1%). While most of these Tier 1 suppliers are located in countries with lower risk of modern slavery, Barmingo Canada recognises that suppliers will usually source their own goods from elsewhere, which presents additional modern slavery risks within the Barmingo Canada supply chain. Barmingo Canada currently has limited visibility with respect to its suppliers beyond Tier 1 and is still developing its capacity to systematically identify and respond to modern slavery risks at Tier 2 and beyond.

Tier 1 global supplier locations



Our approach

Perenti believes that considering sustainability in everything it does is critical to deliver its purpose to create enduring value for all our stakeholders. Given the global prevalence of modern slavery and the nature of the mining industry, Perenti recognises that modern slavery practices likely occur in its value chain. Therefore, managing these risks is a key component of Perenti's commitment to sustainability.

Perenti seeks to align its business activities and practices with relevant international standards including the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Voluntary Principles on Security and Human Rights. Perenti believes industry collaboration is essential to share learnings and provide consistency in managing modern slavery risks.

An overview of how Perenti implements processes designed to prevent, identify, and respond to modern slavery issues, including steps taken in FY23, is provided below. As part of the Perenti Group, these processes apply to Barmenco Canada unless otherwise specified.

Identifying and assessing modern slavery risks

Perenti has worked with an independent third party to undertake a risk assessment covering the Group (including Barmenco Canada) guided by the UNGPs to understand where human rights risks, including modern slavery risks, may exist within Perenti's business. A key part of the risk assessment was understanding the existing controls and identifying any potential gaps.

The assessment involved a desktop review of relevant corporate policies and procedures and information relating to the Perenti's operational footprint, inclusive of its supply chain. In addition, interviews and workshops were conducted with key personnel from across the business to ensure a cross-functional understanding and perspective of potential risks, and that existing controls and gaps were captured. Functions involved included: legal, supply/procurement, human resources, security, safety, environment, risk and sustainability.

The assessment found that the risks were largely dependent on location, with higher risks linked to complex operating environments, where there are greater safety and security issues, political unrest, and corruption.

Key modern slavery risks identified through the assessment included:

- **Labour** – Modern slavery risks are exacerbated in business models that rely on complex contracting and sub-contracting arrangements and where third parties are extensively used. In the case of Barmenco Canada, while the majority of its workforce is directly employed, labour hire services may be used to source specific skill sets or local employees.
- **Procurement** – Barmenco Canada procures a range of services from about 250 active suppliers. Key spend categories and services procured include heavy equipment, consumables, parts, spares, ground support and tyres.
- **Business Relationships** – Perenti is typically engaged by mine operators to provide services and therefore may be affected by the actions of our clients. Specific consideration was given to ensuring measures are in place to identify these potential risks, and explore ways to leverage relationships with clients to manage risks, particularly in relation to water usage, waste disposal, health and safety, and community interactions.

Managing modern slavery risks

Governance

Perenti's Governance Framework ("PGF") plays a critical role in helping the Group (including Barmenco Canada) deliver on its strategy and objectives. It provides the structure through which business objectives are set, performance is monitored, and risks are managed.

Board and the Group Executive Committee

The risk that modern slavery practices may be present in Perenti's value chain is recognised throughout the Group, starting with the Perenti Board. Human rights risks, inclusive of modern slavery risks, are overseen by the Board Safety and Sustainability Committee. The Safety and Sustainability Committee is responsible for approving Perenti's reporting mechanisms and policies relating to modern slavery, requiring appropriate resources for effective modern slavery management and reviewing information on Perenti's modern slavery risk management approach and effectiveness.

The Chief People and Sustainability Officer is responsible for ensuring governance frameworks are in place to ensure modern slavery risks are assessed and managed throughout the Divisions. Accountability and implementation of our modern slavery prevention processes are allocated to relevant roles within the business.

Code of Conduct

Perenti's Code of Conduct (comprising a Code of Conduct Policy and Code of Conduct Booklet) describes how Directors and employees should conduct themselves to work together to fulfil Perenti's purpose and sets out the expected behaviours of Directors, employees, contractors, consultants and suppliers and agents. The Code of Conduct embodies Perenti's commitment to good corporate governance and responsible business practice and is included in the mandatory induction modules, and subsequently in refresher training.

Anti-bribery and Anti-Corruption Policy

Perenti recognises that modern slavery can be linked with bribery. Perenti is committed to the highest standard of ethical conduct and regulatory compliance. Management authority is delegated through risk-based delegation of authorities; appropriate segregation of duties is in place and compliance risks form a key part of Perenti's broader risk framework. A training module on the Anti-Bribery and Anti-Corruption Policy is mandatory for employees in people leadership roles.

Perenti's Speak up (Whistle-blower) Policy sets the expectation that all employees have a responsibility to help detect, prevent and report immediately instances of misconduct. Speak Up is an independently managed service that provides numerous avenues to confidentially report allegations of misconduct. Any material breaches of the Anti-Bribery and Anti-Corruption Policy are reported to the Board and Audit and Risk Committee.

Human Rights Policy

Perenti's Human Rights Policy provides guidance to directors, management, employees, contractors and suppliers on Perenti's expectations regarding human rights, inclusive of modern slavery. Human Rights is also covered in Code of Conduct training and inductions for every employee.

Group Standards and Grievance Mechanisms

A key part of the PGF is the Group Standards which are controlled documents that describe important Group-wide frameworks and establish minimum and mandatory performance requirements in important areas. Three key Group Standards establish practices for managing modern slavery risks throughout the business:

- Sustainability Group Standard – sets approach to meet stakeholder expectations and manage sustainability-related risks, including human rights and modern slavery risks and response.
- Human Resources Group Standard – sets approach to human resource management within the business, inclusive of employment relations, onboarding and internal grievance management.
- Security, Emergency & Crisis Management Group Standard – sets the approach to security management, which aligns with the Voluntary Principles on Security and Human Rights.

An external grievance mechanism has been developed to standardise Perenti's approach across the Group.

Labour

Perenti is committed to ensuring all employees and contractors are treated in a fair and ethical manner and can work in a safe and respectful work environment.

Employment practices

Across its varied employment jurisdictions, Perenti works closely with the relevant governments, union representatives and employee groups to ensure adherence and compliance to the required labour laws, HR regulations and labour rights policies.

New employees are provided with a contract of employment in the appropriate language containing approved terms and conditions and schedule of appointment in accordance with country legislation, as well as documentation outlining any applicable employment entitlements.

If employees are covered by an industrial instrument they are also provided with a copy of the instrument. Governance procedures are maintained to ensure compliance with obligations outlined in all relevant collective bargaining agreements and awards, as well as applicable employee entitlements.

In addition to maintaining the required minimum labour regulations across the Group, Perenti holds itself to a high standard of business policies related to Code of Conduct, Anti-bribery and Anti-corruption and Speak Up. These policies ensure all employees and contractors are aware of, and adhere to, practices that are ethical, fair and help create an environment free from harassment, discrimination, or victimisation. Employees and those employed via a labour hire service receive the same induction, which sets out an expectation that those employed, or otherwise engaged by Perenti adhere to the Code of Conduct and other relevant corporate policies and procedures.

Labour hire services

About 90% of Barmingo Canada's workforce are employed directly, and 10% of its workforce are sourced from labour hire providers. Engagements with labour hire service providers are governed by internal standards and in compliance with each country's applicable legislation, including:

- Adherence to minimum age of recruitment in the country
- No forced labour in our employment relationship with employees
- Freedom of association and the right to organise
- Equal remuneration for similar positions (i.e. pay scales for positions)
- Prevention and management of discrimination in the workplace.

Employee feedback mechanisms and disagreement management

Perenti seeks employee feedback through periodic culture surveys to measure how engaged people are in their work and the overall cultural health of the organisation. Outside of this process employees can raise concerns through internal grievance procedures or the Speak Up mechanism.

In the event any of Perenti business becoming subject to an employment disagreement, experienced operations managers are able to manage these issues with the support of local human resources teams and if necessary, legal advisors, who are all well versed in the relevant laws and regulations of Perenti's host countries.

Procurement and Business Relationships

Perenti's procurement function consists of a range of supplier and market focused activities, which includes planning, sourcing and management of goods and services.

Supplier contracting and onboarding

Under Perenti's operating model, the Corporate Procurement function provides minimum requirements for procurement of goods and services by Divisions. The day-to-day management of supply and procurement is managed by the Divisional procurement teams.

Perenti is developing a Contracting Group Standard which will ensure it is formalised within the PGF that procurement of goods and services across the Group is conducted in accordance with relevant legal requirements, Perenti Group policies, and appropriate industry practice to achieve compliant, reliable and competitive procurement of goods and services. Divisions will review and, if necessary, update Divisional Procurement Standards to ensure alignment with the Contracting Group Standard.

The Contract Mining Division has anti-slavery and anti-human trafficking clauses in contracts with suppliers and standard purchase order terms and supply contracts. The Contract Mining Division also requires suppliers to complete self-assessment questionnaires for modern slavery when completing engagement with, and onboarding suppliers.

The Group Risk and Assurance function periodically undertakes internal audits of performance against contracting and onboarding requirements including adherence to internal modern slavery processes and the Sustainability Group Standard and contracting standards.

Supplier mapping, risk assessment and verification

Although modern slavery practices can occur in any country or industry, there are several factors that can increase the risk of modern slavery and therefore Perenti uses a risk profile tool to assess its Tier 1 suppliers based on their geographic location, value of spend and nature of the activities being undertaken. The tool enables Perenti to take a risk-based approach to supplier management by using global indexes to consider the social, political, legal and economic factors of a country or region in combination with the risk profile of the supplier's industry.

To support site audits of supplier facilities Perenti has developed a supplier audit framework to verify supplier conformance with Perenti's policies and procedures, international good practice, and local regulation. The framework contains a general set of questions for all suppliers, as well as a more detailed set of questions for those considered high-risk.

Training

Perenti has developed a Human Rights Training Module in consultation with senior leaders and key individuals from across Group entities. The aim of the module is to increase knowledge and understanding of human rights, inclusive of modern slavery, within the Company, and ensure there is clarity in how human rights risks are managed. The module will continue to be rolled out across the Group in FY24, and on an as needed basis.

Assessing effectiveness of modern slavery management at Perenti

The effectiveness of modern slavery management practices across the Group are regularly reviewed to maintain suitability and effectiveness. This is primarily done through scheduled governance system document review cycles, risk reviews and the assurance and compliance functions. The effectiveness of risk management and the system of internal control is verified through an assurance framework designed to target key risk areas.

Remediation Measures

Perenti recognises that any forced labour or child labour found in an organization's business or supply chain should be addressed on a first priority basis. During FY23, Perenti (including Barmenco Canada) did not identify any instances of forced labour or child labour across its business or supply chain. Therefore, no remediation measures have been necessary.

Perenti also recognises that any remediation measures potentially have the unintended consequence of inflicting loss of income on vulnerable groups, such as migrant labourers, unskilled labourers, indigenous people, women or children. During FY23, Perenti did not discover instances of modern slavery across its operations and supply chain and have not taken any remediation measures that would have led to loss of income to the most vulnerable families. Therefore, Perenti has not been required to take measures to remediate the would-be loss of income to vulnerable families.

Approval

As part of the Perenti Group, Barmenco Canada is committed to respecting human rights and managing modern slavery risks in accordance with this Report.

Perenti did not find any evidence of modern slavery in its operations or supply chain in FY23. It is recognized that the risks of modern slavery are complex and evolving. As part of the Perenti Group, Barmenco Canada and will continue to work to address these risks. This will involve actively engaging with stakeholders to assess the effectiveness of the identified actions to continually enhance the approach to management.

The Barmenco Canada Board of Directors authorised and approved the publication of this Report on 30 May 2024 pursuant to section 11(4)(b)(ii) of the Canadian Supply Chains Act.

In accordance with the requirements of the Canadian Supply Chains Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for Barmenco Canada. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of Canadian Supply Chains Act, for FY23.

I have the authority to bind Barmenco Canada.



Mark Norwell

Managing Director and Chief Executive Officer
Perenti



MODERN SLAVERY REPORT FY23

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