

This policy forms part of the Brendan McKenna Earthmoving Integrated Management System (IMS) and supports the organisation's commitment to ethical business practices, responsible procurement and continual improvement through compliance with applicable legal and organisational requirements.

Policy Statement

This policy reflects Brendan McKenna Earthmoving Pty Ltd.'s committed to ensuring, so far as reasonably practicable, that modern slavery does not exist within our business operations or supply chains. We are committed to acting ethically and with integrity in all business dealings and relationships, and where possible, to ensure modern slavery is not taking place in our own business or supply chain.

As part of our contracting processes, we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude.

Our business also expects its service providers, suppliers and contractors to share our commitment to act lawfully and ethically and to work to ensure that modern slavery is not taking place within its organisation or within its supply chain.

- As per Procurement & acquisition of Plant & Equipment OP-PR-024 V2
- As per Purchasing & Procurement Small Goods & Services OP-PR-005 V1

Policy Objectives

Brendan McKenna Earthmoving Pty Ltd aims to:

- conduct business ethically and responsibly
- prohibit modern slavery and exploitation practices
- promote lawful and fair labour practices
- engage suppliers and contractors that align with organisational expectations
- reduce modern slavery risks within operations and supply chains
- comply with applicable legislation and procurement requirements

Definitions

The term 'modern slavery' describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Coercion, threats and deception can be explicit or implicit.

The Modern Slavery Act 2018 (Cth) 'Act' defines modern slavery as including eight types of serious exploitation; trafficking in persons, slavery, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour and deceptive recruiting for labour or services.

The worst forms of child labour means extreme forms of child labour that involve the serious exploitation of children, including through enslavement or exposure to dangerous work. The worst forms of child labour does not mean all child work.

Prohibitions

Brendan McKenna Earthmoving Pty Ltd explicitly prohibits its staff, agents, and downstream suppliers from the following:

- a. engaging in all forms of forced labour and human trafficking (also referred to as modern slavery)
- b. engaging in child labour
- c. withholding worker identity or immigration documents
- d. using recruiters that do not comply with local labour laws of the country in which the recruiting takes place

- e. charging workers or potential workers recruitment fees, according to the following interpretation:
Any fees or costs incurred in the recruitment process in order for workers to secure employment or placement, regardless of the manner, timing or location of their imposition or collection.
- f. procuring commercial sex acts during the length of the contract

Policy Review

Brendan McKenna Earthmoving Pty Ltd will review this Policy at least every two years, or earlier where legislative, organisational, operational or supply chain changes occur. Questions or concerns relating to this policy should be raised with the Managing Director.

Under Australian law, modern slavery is defined in the Act. In the event of any inconsistency, the definitions in the Act take precedence over this policy.

Legislation/reference

- Modern Slavery Act 2018 (Cth)
- Fair Work Act 2009
- Work Health and Safety Act 2011 (Qld)
- Brendan McKenna Earthmoving Procurement & Acquisition of Plant & Equipment Procedure (OP-PR-024 V2)
- Brendan McKenna Earthmoving Purchasing & Procurement Small Goods & Services Procedure (OP-PR-005 V1)
- Brendan McKenna Earthmoving Code of Conduct Policy
- Brendan McKenna Earthmoving Supplier Management processes

Approved by:



Brendan McKenna
Managing Director
Brendan McKenna Earthmoving Pty Ltd