



METAROCK

Metarock Group Limited

**Joint Modern Slavery Statement for FY21
Under the Modern Slavery Act 2018 (Cth)**



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INTRODUCTION

This modern slavery statement is a joint statement for the Metarock Group Limited (formerly Mastermyne Group Limited) and each of the entities that it owns and controls (together, the **Metarock Group**). Each entity in the Metarock Group operates under the same policies, procedures and contracts with many of the same suppliers. For this reason, the Metarock group has a single, consolidated approach to minimising the risk of modern slavery.

The Metarock Group is committed to taking measures, implementing controls and adopting audit processes to identify modern slavery risks within its business or supply chain and promotes a culture of corporate compliance and ethical behaviour amongst its employees, suppliers and partners.

The Modern Slavery Act 2018 (Cth) (the Act) requires businesses to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chain. This modern slavery statement is prepared in accordance with section 16 of the Act and is intended to describe the steps taken by the Metarock Group during the financial year ended 30 June 2021 to minimise the risk of modern slavery. However, the Metarock Group recognises that modern slavery issues can manifest themselves in many ways and this statement also covers the Metarock Group's broader efforts to prevent any form of worker exploitation through its business.



GROUP STRUCTURE

Metarock Group Limited ACN 142 490 579 (formerly Mastermyne Group Limited) is an Australian public company headquartered in Queensland and listed on the Australian Securities Exchange.

The Metarock Group owns and controls the following entities, all of which are Australian proprietary companies:

- Mastermyne Pty Ltd ACN 069 346 247, which provides underground coal mining services;
- Mastermyne Engineering Pty Ltd ACN 122 455 707, which sells consumables to the mining industry;
- Mastermyne Underground Pty Ltd ACN 104 743 795, which provides underground coal mining services;
- Mastermyne Underground NSW Pty Ltd ACN 126 151 728, which provides underground coal mining services;
- MyneSight Pty Ltd ACN 130 961 714, which is a registered training organisation;
- Myne Start Pty Ltd ACN 146 459 396, which provides mining services;
- Mastermyne Contracting Services Pty Ltd ACN 163 880 975, which provides underground coal mining services;
- Auscaffold Pty Ltd ACN 106 800 837, which provides mining services;
- Diversified Mining Services Pty Ltd ACN 126 482 282, which provides mining services;
- Falcon Mining Pty Ltd ACN 099 182 368, which provides underground coal mining services;
- Wilson Mining Services Pty Ltd ACN 003 948 605, which provides underground coal mining services;
- Mastermyne (CC) Operations Pty Ltd ACN 653 276 969, which acts as the mine operator for the Cook Colliery Mine;
- Mastermyne Crinum Operations Pty Ltd ACN 644 197 768, which acts as the mine operator for the Gregory Crinum Underground mine; and
- Metarock Pty Ltd ACN 651 285 595, which provides mining services, (together, the Metarock Group).

During FY22 the Metarock Group acquired Pybar Holdings Pty Ltd ACN 088 981 757, which provides mining services, and Pybar Mining Services Pty Ltd ACN 060 589 433, which provides hardrock mining services.

The Metarock Group does not engage in external lending activities, except intra-group lending from time to time.

More information on the Metarock Group is available at <https://www.metarock.com.au/>.

OPERATIONS

Metarock Group Ltd (MYE:ASX) is a leading Australian diversified mining services group.

Previously listed as Mastermyne, the holding company name changed to Metarock after a material acquisition of PYBAR Mining Services in late 2021 that saw the company effectively double in size and expand its commodity exposure across gold, lead, nickel, copper, as well as coal. As business units of Metarock, Mastermyne and PYBAR Mining Services each have a rich history and respected presence in coal and the metal sector respectively, delivering specialist underground services directly linked to production. The diversified and expanded interest of the group provides greater opportunities for our people and enables us to deliver more value to the communities in which we work, our clients and our shareholders.



The Metarock Group's business comprises four main components:

- 1 Mining Services:** the Metarock Group provides services in connection with new mine development and mine operation (both above and below ground) as well as mine support services such as roadway construction, ventilation, conveyors, longwall relocations and application of polymeric strata support;
- 2 Products and Equipment:** the Metarock Group has a fleet of production and ancillary equipment that is on-hired;
- 3 Design and Engineering:** the Metarock Group undertakes new mine studies, mine optimisation, technical services and initiatives to extend current contracts and scopes; and
- 4 Training:** MyneSight Pty Ltd, a wholly owned subsidiary of the Metarock Group, delivers accredited training and mine inductions to create job-ready skilled workforces and training and compliance management solutions to mine operators.

The Metarock Group directly employs approximately 2000 people, the majority of which are based at our operations throughout Queensland and New South Wales.

SUPPLY CHAINS

The Metarock Group seeks to minimise, mitigate and eradicate the risk of modern slavery from its operations with effective implementation of internal frameworks, policies and governance practices while promoting ethical business conduct and the protection of human rights.

The Procurement Department of the Metarock Group is responsible for the procurement of all goods and services for the Metarock Group. Under Metarock's Procurement Procedures, we are committed to using best practice procurement processes and works with suppliers that uphold the standards of the Metarock group.

Risk management is an integral part of good practice. The Metarock Group has a well-established risk management framework and contracts with reputable suppliers. The Metarock Group assess our supply chain as part of our Procurement process including accreditation to Quality Standards.

The Metarock Group engages with it's approximately 750 Tier 1 suppliers through a mixture of short and long term arrangements which are reviewed regularly, and at least at renewal. The predominate procurement spend on Tier 1 suppliers is paid to Australian based entities. Following an assessment of our top 10 suppliers and our Tier 1 suppliers, we have identified that risks of modern slavery could exist within the following categories:



Plant & Equipment
(including parts and tyres)



Chemicals



Electronics
(including IT equipment and phones)



Uniforms and PPE



Cleaning & Security

The Metarock Group utilises a number of actions to deal with modern slavery risk. These include our Procurement Procedures and the adherence to our Code of Conduct. Additionally, the Metarock Group through its operating entities has a Whistleblower policy that enables a person to anonymously report any concerns relating to modern slavery, or breaches of policies or unethical business practices both within the Metarock Group or within our supply chain.

This has allowed us to recognise that there are risks of modern slavery within all of our supply chains, with services such as labour providers and cleaning and security and chemical products sourced from outside of Australia carrying a heightened risk. We explain these risks and our approach to addressing them below.

MODERN SLAVERY RISKS IN SUPPLY CHAINS

The way that the Metarock Group responds to modern slavery risks will change depending on the severity of the risks (to people) and its relationship to the risks. The concepts of "cause", "contribution" and "direct linkage" as set out in the United Nations Guiding Principles on Business and Human Rights assists the Metarock Group understand how its relationship to a modern slavery risk may determine our response.

We recognise that we operate in some geographies, sectors and supply chains that may have an elevated exposure to the risk of modern slavery. Within Australia, our suppliers that represent a higher risk of modern slavery arrangements are within our subcontracted corporate services such as office cleaning and IT. Subcontracted services are known to use a large majority of migrant and low skilled workers, who are recognized as more vulnerable to the risks of modern slavery.

With the goods that we procure the Metarock Group recognizes that there are inherent risks present in products that may have, as part of the supply chain, services provided outside of Australia where there may be a higher prevalence of modern slavery, high migration flow, widespread poverty or a weak rule of law or poor governance. The Chemicals we use and the uniforms and Personal Protective Equipment purchased could be from an area that is predisposed to the above risks.

These overseas supply chains are complex and visibility beyond our Tier 1 suppliers is a challenge to monitor once the process passes that of the Metarock Group's direct supplier and moves further up the supply chain. We remain committed to not procuring "at risk" goods and services and inadvertently contributing to modern slavery. We do this in part through our procurement processes and utilising a suite of commercial terms requiring compliance and governance in the supplier chain.



THE METAROCK GROUP ACTIONS

The Metarock Group has taken a number of actions to identify, assess and mitigate the potential risks of modern slavery in its operations and supply chain:

- The Metarock Group requires employees to act with honesty and integrity while pursuing business objectives and complying with the Code of Conduct for the Metarock Group;
- The implementation of a Whistleblowing Policy, which requires an investigation to be undertaken if improper or illegal conduct is reported. Depending on the outcome of the investigation, remedial action may be undertaken by the Metarock Group; and
- Continual review of our current supplier management processes to include Modern Slavery risk management initiatives and will continue to analyse its procurement department for more opportunities in the future.
- Analysis of current suppliers to determine if / how industries (and their risks) are changing and how the Metarock Group can act accordingly.

We intend to review the effectiveness of the steps we have taken during FY21 to better understand our supply change and to train our staff with the ultimate goal of mitigating the risk of modern slavery in our supply chains.

HOW DOES THE METAROCK GROUP ASSESS THE EFFECTIVENESS OF ITS ACTIONS?

The Metarock Group understands that our Actions will require ongoing review that will occur at least annually. This will ensure that actions identified are development, implemented and assessed for effectiveness.

Our assessment of effectiveness is evidence based utilising qualitative and quantitative data. Deficiencies or improvements are addressed as they arise and opportunities for continuous improvement are identified.

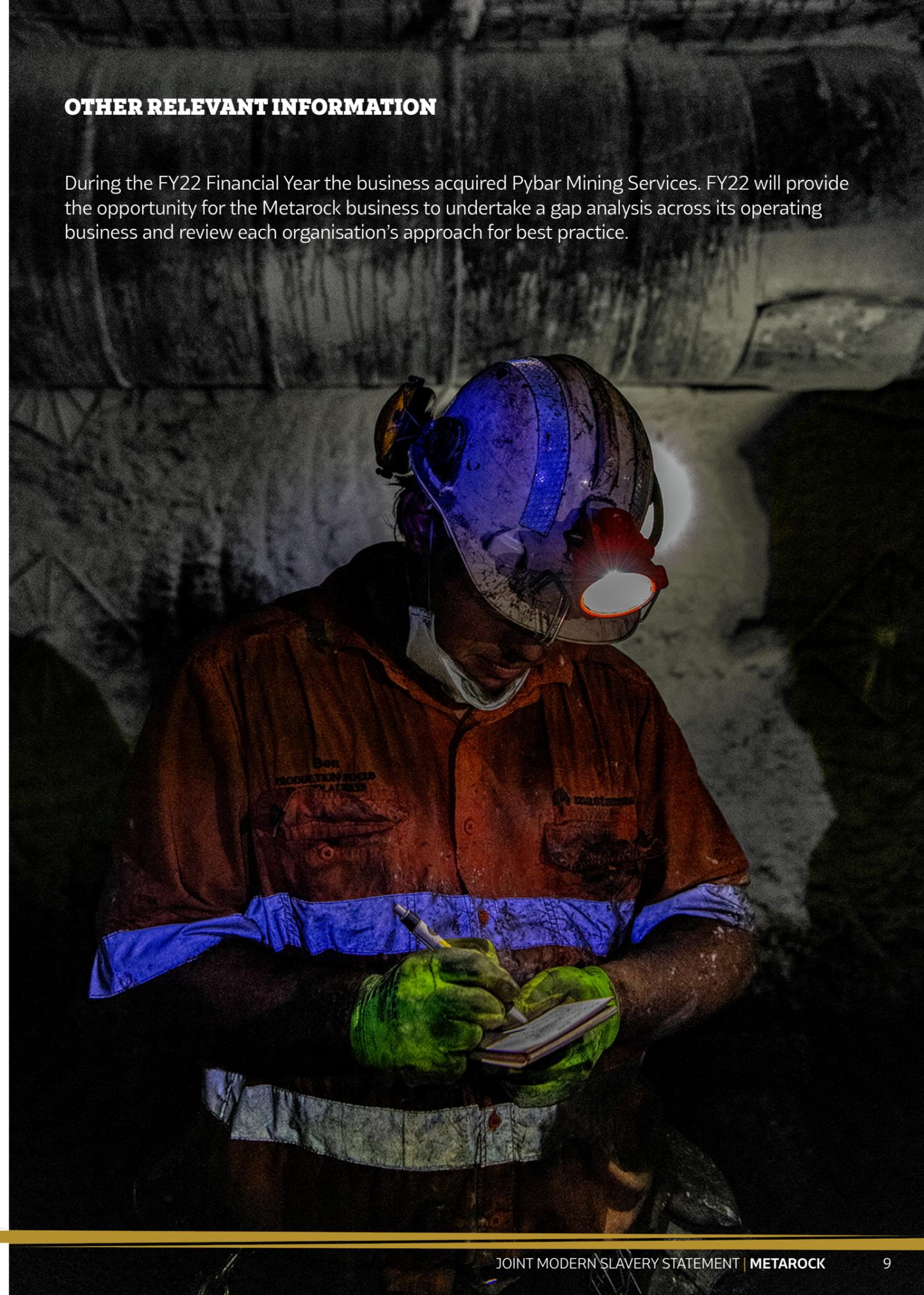
CONSULTATIONS

The Metarock Group has undertaken a consultation process with each member of the Metarock Group to prepare this Modern Slavery Statement. Key representatives of each of the entities was involved in this consultation.

This Modern Slavery Statement has been reviewed by relevant subject matter experts within the business as well as the senior management of the Metarock Group.

OTHER RELEVANT INFORMATION

During the FY22 Financial Year the business acquired Pybar Mining Services. FY22 will provide the opportunity for the Metarock business to undertake a gap analysis across its operating business and review each organisation's approach for best practice.





METAROCK

This Modern Slavery Statement is made on behalf of the Metarock Group for the financial year 30th June 2021. This Statement was approved by the Board of Directors of Metarock Group Limited, as the principal governing body of the Metarock Group, on # December 2021.

A handwritten signature in black ink, appearing to be 'Tony Caruso', written in a cursive style.

Tony Caruso
Managing Director
Metarock Group Limited

Dated: 23 December 2021