

# Modern Slavery Statement

2022



# Contents

- 03 | Overview
- 04 | Our structure, operations and supply chain
- 08 | Potential modern slavery risk in our operations and supply chain
- 10 | Actions taken, assessing and addressing modern slavery risks
- 12 | Additional ways in which we are managing risks in our operations
- 13 | Remediation and management
- 14 | Assessing Effectiveness
- 15 | Other relevant information

# Overview

This is a joint Statement made on behalf of **Epiroc South Pacific Holdings** (ACN 107 374 550) (**ESPH**) and its wholly owned reporting entity, **Epiroc Australia Pty Ltd** (ACN 000 086 706) (**Epiroc Australia**) in compliance with section 13 of the *Modern Slavery Act 2018* (Cth) (the **Act**).

This is Epiroc Australia's third Modern Slavery Statement (the "**Statement**") and covers all activities undertaken during the year 1 January 2022 to 31 December 2022 (the "**Reporting Period**").

The Statement sets out the requirements of the **Act** including important information regarding our structure, operations, and supply chain. It

also details the potential risks of modern slavery practices in our operations and supply chains, so that we may evaluate and respond to those risks accordingly.

The Statement further expands on some of Epiroc's key policies and actions taken to assess and address modern slavery risks, including the Epiroc Code of Conduct and the Epiroc Business Partner Code of Conduct which focuses on ensuring that our business partners are held to the highest ethical, social, safety, health and environmental standards.

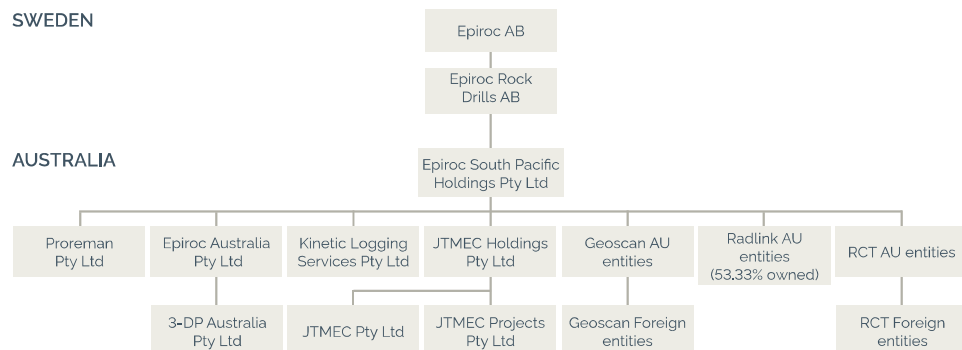


# Our structure, operations and supply chain

## Structure

This Statement has been prepared by Epiroc Australia for the purposes of satisfying the requirements of the Act. The Act requires steps to be taken to identify and mitigate modern slavery practices in supply chains and requires businesses to publicly identify the steps taken.

For the purposes of this Statement, we have provided below the structure and operations of Epiroc South Pacific Holdings Pty Ltd and Epiroc Australia Pty Ltd.



ESPH is a non-operating, holding entity of the Australian group of Epiroc companies, whose ultimate parent entity is Epiroc AB located in Stockholm, Sweden.

In Australia, during the Reporting Period, the Epiroc group comprised of the following entities.

Entity	Operations
Epiroc South Pacific Holdings Pty Ltd (ACN 107 374 550)	Non-operating holding company for the Australian group of Epiroc companies.
Epiroc Financial Solutions Australia Pty Ltd (ACN 120 897 538)	A Sydney-based company that acquires equipment from ESPH subsidiaries to sell under a leasing arrangement to customers.
Fordia South East Asia Pty Ltd (ACN 072 612 447)	This company was part of a global acquisition in 2019. The company was non-operational during the reporting period with Epiroc South Pacific Holdings acquiring the net assets of Fordia as at 31 May 2020.
MineRP (Australia) Pty Ltd (ACN 101 951 017) (AUJ)	This company was acquired in 2021. The Company supports mines in strengthening and optimising their operational efficiency by providing a leading software platform solution that integrates all technical mining data and other information such as machine data and ERP systems.
Epiroc Australia Pty Ltd (ACN 000 086 706)	This is the main operating entity in Australia, and the sole shareholder of 3D-P Australia Pty Ltd. Epiroc Australia is considered a reporting entity under the Act.
ProReman Pty Ltd (ACN 621 802 104)	A company acquired in 2018 which operates as a customer center for Epiroc AB (located in Sweden).
Kinetic Logging Services Pty Ltd (ACN 133 949 630)	This company was acquired in 2021 and provides mining companies with geophysical logging services.
3D-P Australia Pty Ltd (AVD) (ACN 146 924 236)	This company was acquired in 2021 and provides wireless connectivity solutions for surface mining.
JTMEC Holdings Pty Ltd (ACN 114 937 245)	This company was acquired in 2022 and is an electrical manufacturer and contractor that provides mining and industrial power solutions to customers. The acquisition supports the transition to battery electrification. There are also 2 subsidiary companies owned by JTMEC Holdings Pty Ltd, JTMEC Pty Ltd and JTMEC Projects Pty Ltd.
Geoscan Pty Ltd (ACN 093 531 616)	This company was acquired in 2022 and provides digital core and geological imaging solutions for mining companies. There are also 13 subsidiary companies owned by Geoscan Pty Ltd.
Remote Control Technologies Pty Ltd (ACN 009 343 195)	This company was acquired in 2022 and provides interoperable machine solutions to revolutionise the mining and industrial sectors by providing automation and remote-control solutions for mining customers.
Radlink Holdings Pty Ltd (ACN 137 270 421)	ESPH acquired a 53% ownership interest in 2022. This entity is a communications integrations company that provides solutions to mining and other industries.



This Statement is focused on the operations and supply chain of Epiroc Australia as this is the operating entity for our core business activities and the only operating entity wholly owned by ESPH with revenue exceeding the Act's AUD \$100 million reporting threshold. Radlink Holdings Pty Ltd, is also a reporting entity under the Act and prepares its own Modern Slavery Statement.

## Our Operations

As part of the broader Epiroc Global Group of companies, the ESPH Group develops and produces innovative equipment, consumables, and service for use in surface and underground mining – and with infrastructure, civil works, well drilling and geotechnical applications.

While our operations and customer base are focused on Australia, the broader Epiroc Global Group operates all over the world, with customers in more than 150 countries.

During the Reporting Period, the ESPH group employed over 1,700 people (including 712 people directly employed by Epiroc Australia as a reporting entity) to provide products and offerings primarily used in hard rock applications, though also including:

- ⊕ Mining applications, which include production and development work for both underground and open-pit mines, as well as mineral exploration.
- ⊕ Infrastructure applications including blasthole drilling for tunneling, for road, railway and dam construction, aggregate production and other construction work, demolition of buildings, bridges, and industrial plants as well as other drilling applications.
- ⊕ Digital and communications applications, which include digital core imaging, wireless communications, and electrical services.
- ⊕ Automation, digitalisation and electrification solutions to increase safety and productivity.

Our vision is to "Dare to Think New". This vision supports Epiroc's role in accelerating the transformation of the energy transition through support for sustainability initiatives. We challenge our way of working, thinking, and acting to find new and sustainable solutions in this rapidly changing world. We see possibilities and dare to question the status quo. We believe that this can be achieved by adopting a common set of values, including being ethical in our business practices and working with business partners who share similar standards.

## Our supply chain

Epiroc Australia's direct global supply chain consisted of 1,299 suppliers during the Reporting Period and included both international and Australian-based companies.

The majority of goods procured from Epiroc Australia in FY22 were sourced from within the international Epiroc Group of companies, and primarily encompass rock drilling equipment and related parts.

A limited number of non-Epiroc international suppliers were utilised in 2022. These suppliers meet Epiroc Australia's "indirect procurement" needs and include organisations residing in Germany, Great Britain, the USA and Singapore. Australian suppliers also contribute to the Indirect Procurement category and include major Australian organisations who meet the requirements of Epiroc's Business Partner Code of Conduct, Refer to Section 4 below, which provides a further overview of our policies and requirements set in place as they relate to our business partners and suppliers.



# Potential modern slavery risk in our operations and supply chain

With respect of understanding modern slavery risks within our operations and our supply chain, Epiroc Australia has adopted the definition of modern slavery as described in the Act. This definition encompasses trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.

## Operations

Epiroc has assessed the risk of modern slavery in its operations for the Reporting Period as low.

In Australia, the ESPH Group's workforce comprises mostly of directly employed permanent, Australian-based employees that are engaged in accordance with Australian workplace laws, applicable awards and enterprise agreements (as applicable).

Australia is considered a low-risk environment for modern slavery practices according to the Global Slavery Index. During the Reporting Period, ESPH and Epiroc Australia Pty Ltd did not engage the services of any international migrant workers or other workers that would typically be considered vulnerable to exploitation. However, we acknowledge that modern slavery is often challenging to uncover and as such, we will continue to educate ourselves and our employees on the issue and how to identify it.

The ESPH Group has developed appropriate policies and processes to ensure that all employees are treated equally and that all conduct falls within our expectations around ethical practices and lawful behaviour. Section 4 of this Statement outlines the policies and process adopted by the ESPH Group to assess and address potential modern slavery risks in our workforce.

## Supply Chain

During the 2022 reporting period, Epiroc Australia undertook a counterparty risk assessment of its direct suppliers based on geographic location (country-related) and by type of goods or services provided (industry-related).

The analysis utilised a tool that ranks country-related risks based on several factors. The analysis considered the geographic location and governance of the suppliers, and type of industry against the following risk categories:

**Geographic Location:** The analysis recognised that some geographic locations have a greater prevalence of modern slavery risk, due to factors such as governance issues, or a lack of basic needs and inequality.

**Industry Specifics:** In assessing the goods and services provided via various industries, the tool considered the likelihood of minimum requirements for labour rights, health and safety, human rights, and community infrastructure.

## Geographic Location

The results of the assessment highlighted that of our direct international suppliers, the countries with a higher risk profile for modern slavery in our supply chain include Papua New Guinea, Singapore, South Africa, China, India, Japan and Philippines.

Epiroc's suppliers in these countries are part of the global Epiroc network of operations, and as such are subject to the standards of procurement of Epiroc AB and its subsidiaries. The modern slavery risk with goods sourced from Epiroc AB owned companies is assessed as being low due to these strict controls.

## Industry Specific

A portion of the ESPH Group's suppliers also operate in industries that are deemed to be at a higher risk of modern slavery, including:

- Travel (including hotels & resorts);
- Office services & supplies;
- Support services (including cleaning services);
- Human resource & employment services;
- Real estate services; and
- Technology hardware.

We acknowledge that although the majority of our direct suppliers in these industries are based in countries which are considered lower risk, their suppliers may operate in higher risk regions

or industries. As part of our intention to better understand our deeper supply chain, we aim to gain a better appreciation of the associated underlying modern slavery risk, in order to enhance our approach to identifying and managing it.

## Conflict Minerals

ESPH and Epiroc Australia recognize that the nature of mining and the materials that we use in our goods and equipment, particularly with its focus on electrification of products, can pose human rights and environmental risks to workers and local communities, particularly where minerals have a higher likelihood of being conflict minerals such as cobalt.

In relation to cobalt used in batteries, Epiroc AB ensures that the batteries sourced globally are procured in a transparent manner. We also acknowledge the importance of responsible sourcing of the minerals included in our products.

As an entity under Epiroc AB, suppliers of products containing tin, tungsten, tantalum or gold (3TG) are required to identify and declare the origin of such minerals present in the products and components sold to Epiroc AB. This ensures that the minerals do not directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo, and that the products are conflict free.

Epiroc AB has a dedicated conflict minerals program for several years, focusing on the origin of tin, tungsten, tantalum, gold (3TG) and cobalt in our products to ensure responsible sourcing within our supply chain. The program and tools developed are built on the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, as well as on the tools of the Responsible Minerals Initiative (RMI) that Epiroc is a member of. Information on the presence and origin of 3TG in Epiroc products is consolidated and shared with interested parties.

In 2022, Epiroc AB requested that 222 (227) relevant suppliers declare the origin of 3TG present in their products. 82% (89) of the suppliers of products containing 3TG responded. 387 (496) smelters of tin, tungsten, tantalum and gold were identified by our suppliers, none of which finance armed groups in the Democratic Republic of the Congo. In 2023, we will continue to follow up with and educate our suppliers to ensure a deeper knowledge and an increased response rate.



# Actions taken, assessing and addressing modern slavery risks

During the Reporting Period, no incidents of modern slavery or human rights violations within the ESPH Group's operations or supply chain were recorded or raised. However, we do understand that such incidents may be hard to uncover and it is for this reason that the ESPH Group has worked to develop appropriate policies and processes to help, to the highest degree possible, to minimise any such risks in both our operations and supply chain.

Epiroc also acknowledges that a deeper view of our supplier's supply chain and practices may reveal a higher level of risk. As such, in the future we endeavor to gain a greater understanding of the underlying risks of modern slavery, and of our entire supply chain so that we may improve our approach to identifying and managing risks.

## Due Diligence

Our procurement team is responsible for developing, initiating, and managing strategic sourcing activities by coordinating with key stakeholders and preferred suppliers to build strong supplier relationships and achieve beneficial outcomes for both our business and our supply chain.

The procurement team selects and evaluates business partners in a professional, objective and risk averse manner, with a focus on quality that extends beyond just the final product and includes how our suppliers conduct their business.

ESPH and Epiroc Australia conduct supplier evaluations using objective criteria, including but not limited to quality, risk minimisation, productivity, delivery performance, safety, reliability, commercial performance, competence, and price as part of its due diligence approach prior to engaging suppliers. The ESPH Group is committed to the ongoing monitoring of suppliers, including requiring suppliers to notify Epiroc Australia of any significant changes to their supply chain risks.

As part of its ongoing commitment, the Global Epiroc Group is committed to undertaking regular annual due diligence on its key suppliers to ensure that the risk of modern slavery is monitored and appropriately reviewed.

## Managing Supply Chain and Supplier Relations

ESPH and Epiroc Australia has put in place controls to manage the risks of Modern Slavery within our greater supply chain. Each tool works together, and we regularly add to this suite of actions.

Below, we provide an overview of the relevant policies and processes in place to ensure that our suppliers and other business partners act in accordance with our ethical and sustainability expectations, as outlined in our Code of Conduct, as well as all applicable laws and regulations.

## Epiroc Business Partner Code of Conduct

During the FY22 Reporting Period, the Business Partner Code of Conduct was updated to reflect updated standards and expectations of Epiroc suppliers.

Epiroc is a signatory to the United Nations Global Compact and its Business Partner Code of Conduct is based on the following internationally recognized standards:

- UN Global Compact Ten Principles UN Convention Against Corruption
- UN International Bill of Human Rights
- The International Labor Organisation
- Declaration of Fundamental Principles and Rights at Work and subsequent core conventions
- UN Guiding Principles ("UNGP") on Business and Human Rights
- OECD's Guidelines for Multinational Enterprises
- The Rio Declaration on Environment and Development

The ESPH Group stands for respect for human rights across our business operations. We identify and manage these issues through responsible sales assessments and a responsible sourcing process. Implementing the UNGP is an ongoing process that includes awareness-raising, process development, implementation and follow-up across the value chain. Our challenges include identifying risks and influencing other parties' behavior even when it is beyond our direct control. We guide our businesses with the help of various policies, processes and tools.

Conducting business in a responsible manner is of great importance to the ESPH Group. Therefore, we choose to work with business partners with high standards. This relates both to the quality of the goods and services they are providing as well as to their acting in accordance with high ethical standards and integrity. Our Business Partner Code of Conduct spells out our criteria for business partners, to which they are all required to commit, follow and uphold. It is available in 13 languages and is published on our corporate website and communicated to our business partners.

As detailed within the Business Partner Code of Conduct, it is expected that business partners must, in all their activities, follow the national laws and regulations applicable to their operations and employment in the countries in which they operate. Where Epiroc Australia's requirements go beyond those set out in suppliers' local national law, we expect our business partners to comply with the Epiroc standards.

Globally, for FY 22, the total number of significant suppliers was 1 597 (1 422) and 99% (100) confirmed compliance with our Business Partner Code of Conduct. Epiroc will continue to monitor and ensure suppliers are following our code of conduct and the related standards inherent.

New business partners are notified of our requirements through the distribution of the Epiroc Business Partner Code of Conduct, which they are required to review and sign off as part of the contractual requirements when the supplier is engaged.

Epiroc AB has continued to implement the Responsible Sales Assessment process which was launched in 2019. This program helps Epiroc understand and identify mitigation measures for potential human rights, corruption, and environmental risks, including in country and customer risks where modern slavery could be more prevalent. During 2022, a baseline was established and a rollout plan to reach the 2030 goal was set. Additional targeted trainings on the process took place with selected high-risk markets and further improvements of the content and quality of the process will take place in 2023.

## Surveys and Audits

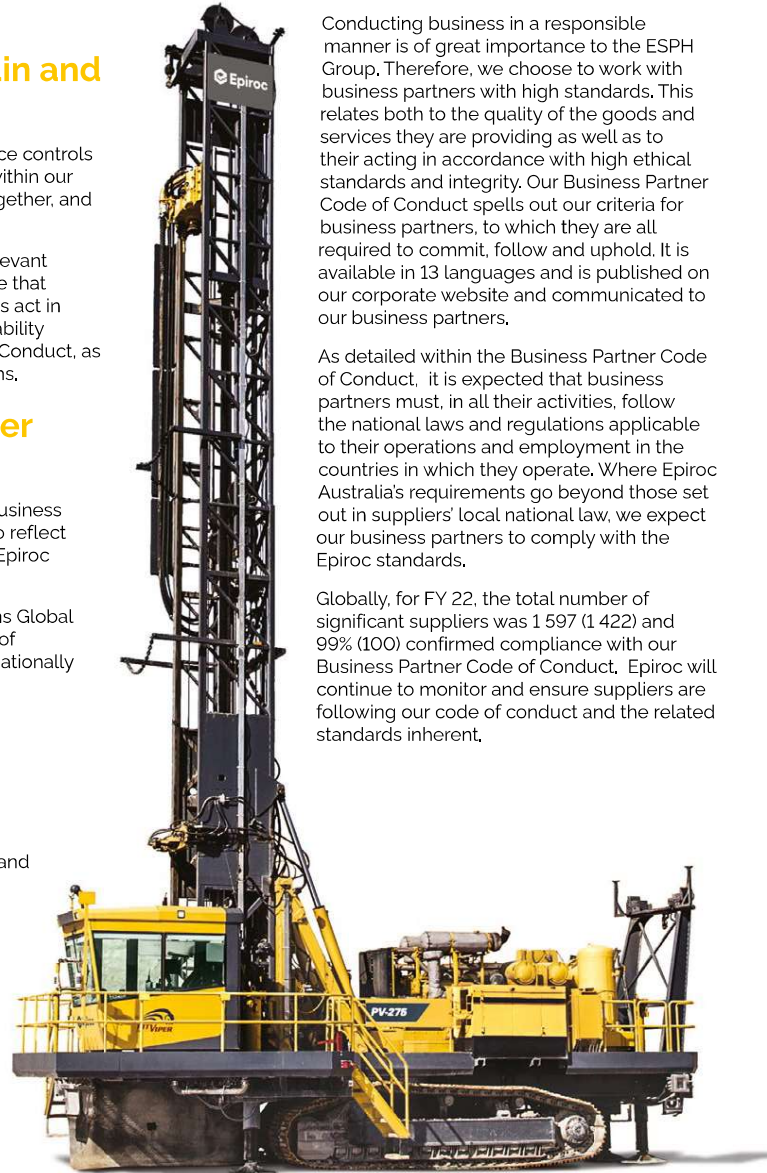
The global Epiroc Group has developed mechanisms, such as surveys and audits, to monitor and follow up on business partners and their compliance with the Business Partner Code of Conduct. ESPH and Epiroc Australia reviews its relationship with business partners and if violations are detected the business partners will be immediately requested to adapt or change to meet the criteria.

We also require that business partners maintain adequate documentation to demonstrate their compliance with our criteria for managing risks of modern slavery or demonstrate their intention and willingness to comply with the criteria by establishing an action plan with activities.

ESPH and Epiroc Australia requires that as a condition of doing business with us, business partners and their subcontractors must authorise Epiroc and its designated agents (including third parties) to perform audits.

## Terms and Conditions

ESPH and Epiroc Australia ensures that its contracts, as well as its suppliers' purchase order terms and conditions, reflect our commitment to ensuring transparency in our supply chain. In every transaction, we require that the standards in human rights and health and safety are met. This includes suppliers providing warranties that the services and supply provided are in compliance with relevant laws. Epiroc is in the process of developing a modern slavery clause for inclusion in all its commercial contracts. This is regularly being monitored by us, and we will keep striving to improve our terms and conditions.



# Additional ways in which we are managing risks in our operations

In addition to the business partner criteria and expectations outlined above, the Epiroc Group has developed key policies and processes that enable the organisation to create and maintain a safe environment where potential risks are effectively managed. Epiroc conduct education sessions and provide access to our key policies and procedures to help educate and inform our workforce of the signs of modern slavery and how to report any concerns. Some of our key policies and processes include the following.

## The Epiroc Way

"The Epiroc Way" is part of our corporate governance and management system designed to support our organisation and assist local Epiroc Customer Centers to understand and improve their business in line with Epiroc Group's principles. "The Epiroc Way" includes our global policies, guidelines and procedures that describe how the Epiroc Group operates covering covering a number of different compliance, sustainability and corporate responsibility topics, such as purchasing, safety, health, environment, quality, trade compliance, taxes, anti-corruption, data privacy, anti-money laundering, anti-trust and human rights. It is available to all Epiroc employees through the intranet and is updated annually.

## Code of Conduct

The Epiroc Code of Conduct describes who we are as a company and what we stand for, outlining the appropriate business conduct and expected behaviours that all employees are expected to follow. The Code of Conduct summarises Epiroc Australia's core values and is based on applicable law and internationally recognised principles for how companies should conduct business responsibly.

Broadly, the Code of Conduct adopted covers topics relating to sustainable practices, including but not limited to: corruption, money laundering, fair employment, health, safety and labor conditions,

social and environmental sustainability and sustainable development.

The Code of Conduct describes who we are as a company and the high ethical standards and integrity we should follow as a company. It is based on applicable law and internationally recognized principles for how companies should conduct business responsibly. All employees of Epiroc Australia are required to undertake annual training in our Code of Conduct which is regularly updated. It contains sessions on business and human rights, non-discrimination, labor standards, modern slavery and other human rights issues.

## Purchasing Policy

The Epiroc Australia Purchasing Policy outlines the guidelines followed for all procurement and sourcing activities. A central principle of the policy is that only those suppliers who share Epiroc's vision, core values, and ethics (as defined within the Business Partner Code of Conduct) will be sought engaged and ultimately contracted by Epiroc Australia.

## Speak Up

"Speak Up" is our whistleblower system across the Epiroc Group which plays an important role in monitoring compliance with our Code of Conduct and provides an avenue for the workforce and stakeholders to make reports in relation to violations of the Code of Conduct, laws, regulations or group policies. Speak Up is managed through a third party and allows employees and external stakeholders to report potential non-compliance anonymously. Retaliation against any employee for reporting an ethics or compliance issue is not tolerated and the number of cases reported via Speak Up is publicly disclosed in Epiroc AB's 2022 Annual Report. The number of cases reported via Speak Up or other channels rose in 2022 to 121 (100). In line with previous years, the largest category of reported cases related to labour relations.

# Remediation and management

In circumstances where Epiroc becomes aware that there is an unmitigated and substantive risk of modern slavery practices in the supplier's premises or under a supplier's control, it may take a variety of courses of action.

This may include the following actions:

- Requiring senior personnel from ESPH, Epiroc Australia and the supplier will meet to discuss the breach of agreement and/or significant risks of modern slavery identified in a supplier audit.
- Formal requests requiring immediate response/change to the Supplier's actions in relation to modern slavery.

- Requirement that the supplier provide regular updates to Epiroc on its progress and actions put in place, including its effectiveness of controls.
- If the supplier fails to alleviate ESPH and Epiroc Australia's concerns, and/or there is a breach of the relevant agreement (as it relates to modern slavery or otherwise) ESPH and Epiroc Australia may terminate its arrangements with the supplier and cease to engage with the supplier.



# Assessing effectiveness

Epiroc Australia and ESPH have worked hard to implement robust policies and processes to help manage potential risks, including risks of modern slavery, in which each employee is provided and subject to ongoing training. These policies and processes are further supported by the appetite of our parent company, Epiroc AB, which places an increased focus on sustainable operations, responsible sourcing and supply chain transparency.

As outlined above, our supplier approval process plays a key role in managing and addressing any potential risks. However, the ESPH Group is committed to continuously improving its practices and has developed an action plan specifically tailored to assist reporting entities within the ESPH Group to enhance its practices and their effectiveness as they relate to modern slavery.

This action plan serves as a future roadmap to help enhance the ESPH Group's processes across different areas including governance, monitoring and reporting, due diligence, training, grievances and enhancing our supplier risk assessments.

Since our inaugural Modern Slavery Statement and the implementation of our updated Business Partners Code of Conduct our procurement team has embarked on a project to ensure that we hold a signed Business Partner Code of Conduct for all of our major suppliers. This project is ongoing.

## Consultation and approval process

This Statement has been prepared by members of the ESPH Group executive management team. ESPH Group non-reporting entities, as members of the broader Australian Group, were also consulted and involved in the review of the Statement.

While our Statement has primarily focused on the reporting entities of Epiroc Australia, we are expanding our analysis, reporting and risk management approach to the broader ESPH Group, as outlined on Page 2 above of this statement.

The Statement has been reviewed and approved by the ESPH Board of Directors, which oversees the operations of all subsidiaries that form part of the Epiroc Group in Australia.

# Other relevant information

## Epiroc's Annual Sustainability Report

The Epiroc Group publishes an Annual Sustainability report which details further information in relation to Responsible Business and the Business Partner Code of Conduct. It also details information pertaining to Epiroc's global commitment to ethical conduct. The 2022 Annual Sustainability Report can be found [here](#).

## Modern Slavery Action Plan

In its FY2021 statement, ESPH and Epiroc Australia identified the development of a modern slavery action plan as a future initiative for FY2022. Epiroc Australia has now developed such an action plan that will allow us to enhance our approach to identifying and managing potential modern slavery risks in our operations and supply chain. This action plan was developed during the 2022 Reporting Period and includes proposed actions for the short, medium, and long term. The specific actions captured include:

1. Establishment of a modern slavery cross-functional working group.
2. Subsidiary modern slavery risk review completion for new entities within the ESPH group.
3. Review and roll-out of modern slavery eLearning training to employees.
4. Investigation of additional online supplier questionnaires to consolidate and share supplier responses to other organisation's modern slavery surveys.

5. Review of Epiroc's standard contracting terms and conditions and contract templates, ensuring the inclusion of Modern Slavery clauses in each.
6. Conclusion of trade compliance screening of suppliers and ensuring that exceptions are investigated and resolved.
7. Review of employee and contractor grievance reporting processes to ensure that they enable the reporting of concerns associated with conditions, hours, pay and other business-related human rights concerns.

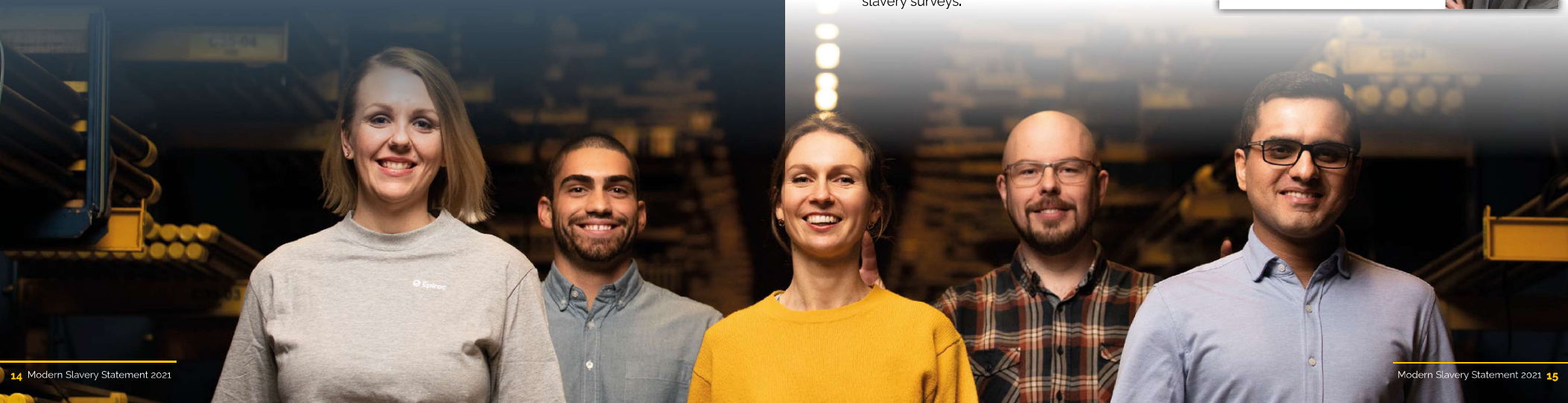
The ESPH Group will continue to review its processes and outcomes to ensure continuous improvement of its supply performance.

## Sign off

This Statement has been approved by Epiroc South Pacific Holdings and Epiroc Australia after consultation with relevant subsidiaries and reporting entities.



**Terence Browne**  
Director  
Epiroc South Pacific  
Holdings Pty Ltd





# United in performance. Inspired by innovation.

Performance unites us, innovation inspires us, and commitment drives us to keep moving forward. Count on Epiroc to deliver the solutions you need to succeed today and the technology to lead tomorrow.

[epiroc.com/en-au](https://epiroc.com/en-au)