



Elastomers Australia Modern Slavery Statement

For the Financial Year ended 30 June 2023

Message from Our General Manager

In compliance with the Australian *Modern Slavery Act 2018 (Cth) (the Act)*, Elastomers Australia is proud to present its inaugural modern slavery statement. This document signifies our strong commitment to addressing and mitigating modern slavery risks within our operations and supply chains, and the actions we are taking to progress our journey.

Modern slavery involves abuse of human rights and serious crimes, which includes instances of human trafficking, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting. Our organisation respects and values the human rights of every person involved in our operations, supply chain and the communities in which we operate. We do not accept any form of modern slavery or human rights abuses in our value chain, and we seek to ensure any instances or risk is eliminated from our operations and wider supply chain. We welcome the introduction of the Act in Australia as an opportunity for our country, sector, and organisations, to improve governance, accountability, and its capabilities around addressing modern slavery and human rights issues both now and into the future.

Our organisation is committed to ensuring that all our employees, contractors, vendors, and agents are treated in a fair, just and equal manner. In the next financial year, we are focusing on ensuring a strong sense of understanding and awareness around the issue within our operations, so all Elastomers Australia personnel are empowered to identify instances of modern slavery and escalate it accordingly.

We are strongly committed to continuously improving our approach to addressing modern slavery risk in our operations and supply chain. We look forward to working with our business partners and peers to identify opportunities for collective action and positive change.



Paul Lane

General Manager Operations

Approved by the Board on the 6th December 2023

1. Reporting Entity

Criteria 1

This modern slavery statement is made by Lettela Pty Ltd (ACN 005 572 305) as trustee for the RJ Letten Property Trust trading as Elastomers Australia for the period 1 July 2022 to 30 June 2023, pursuant to the Australian *Modern Slavery Act (2018)* and was approved by the Board of Directors on the 6th of December 2023.

The Act requires entities over the \$100 million annual consolidated revenue threshold that are either classed as an Australian entity or a foreign entity carrying on business in Australia during the reporting period to publish a statement on actions taken to identify and manage modern slavery risk. This statement covers the reporting period from 1 July 2022 to 30 June 2023.

2. Structure, Operations & Supply Chains

Criteria 2&6

Structure and Operations:

Elastomers Australia is an independent Australian owned and family-operated company, with over 40 years' experience providing specialised screening solutions to the mining and mineral processing industries. It is the number one screen media supplier in Australia having majority of the market share across the coal, iron ore, gold, and other mineral markets. Our range of specialist screen media are manufactured locally utilising various techniques and processes from an innovative range of raw materials to help produce the most cost-effective outcomes for our customers.

Screen media goods encompass the following:

- Panels (of specific height, width & length dimensions) that are designed to allow ore particles to be separated into size, and
- Fixtures that lock in the panels to the screen machines to prevent dislodgement during the screening process.

Screen Media Services include undertaking maintenance of customer sites, through identifying screen media goods that require removal and installation of new parts.

Elastomers Australia has local service, manufacturing and store facilities and branches located nationally in the major mining regions. Our main manufacturing plants are located in Melbourne (VIC) and are supported by our branches and warehouses in Singleton (NSW), Mackay (QLD), Emerald (QLD) and Perth (WA). While we operate solely within Australia, we also have local and a very small number of overseas customers (~2%).

Elastomers Australia directly employs over 280 employees Australia wide. We also engage labour hire contractors across Australia to ensure our operations are maintained at maximum requirements and do not pose a safety threat due to lack of personnel.

Supply Chain:

Elastomers Australia's supply chain encompasses approximately 168 suppliers. The top ten suppliers spend make up 85% of our total spend, which comprise of raw materials and consumables. 99.5% of the total spend encompasses our Australian suppliers.

The top spend categories for FY23 were:

- Stainless Steel
- Polyurethanes
- Rubber, and
- Freight.

3. Modern Slavery

Criteria 3, 4, 5

This inaugural statement marks Elastomers Australia's first step in understanding modern slavery risks, and determining the role our business has in detecting and supporting victims of modern slavery.

Elastomers Australia has engaged an external consultant to help the business understand the issue of modern slavery and enhance our organisation's identification and mitigation of modern slavery risk.

Operations:

Elastomers Australia workers fall into two categories:

- Employees - employed directly under permanent, part-time, or casual agreements.
- Contractors - engaged through Australian labour hire companies.

Elastomers Australia's Human Resources department regularly monitors award rates and changes to legislative requirements, including the National Employment Standards, to ensure that staff receive benefits above the minimum requirements. Manufacturing staff in Victoria are covered by an Enterprise Agreement and all other staff are on employment contracts.

There is greater risk for modern slavery in instances where contractors and sub-contractors are engaged through third parties. To combat this heightened risk, Elastomers Australia's pre-approval process for contractors involves ensuring the company carries a labour hire licence where applicable, is abiding by the terms and conditions of the engagement contract, ensuring employees are meeting minimum entitlements and ensuring employees are receiving certificates. Further, when engaging with labour hire agencies, we incorporate checks in our recruitment process to ensure we have cross-referenced working rights.

Supply Chain:

Approximately 99.5% of Elastomers Australia's suppliers are located in Australia, therefore there is a presumed lower associated risk within our tier one supply chain.

Based on the Global Slavery Index, Australia is considered to be low risk, however, we recognise that there is a risk that Elastomers Australia may be directly linked to modern slavery through our wider supply chain.

Based on a high-level review of our supplier relationships, we believe raw materials such as stainless steel, natural rubber and polyurethane may be high risk as 85% of our total FY23 spend was in these categories. We understand that these raw materials are sourced from Asia, India and China. These locations and material parts have been identified as carrying a higher risk of modern slavery.

We also acknowledge that we lack visibility in certain overseas markets, and this carries additional risks of modern slavery especially in secondary levels of our chain of suppliers and source materials used in our group's goods and services. Further investigation and understanding of their supply chain partners is required to assess areas of vulnerability in our supply chains and to understand and identify any risks we may encounter.

Policies & Governance:

Elastomers Australia has drafted a modern slavery framework which outlines the key actions, deliverables, and accountabilities of Elastomers Australia in relation to modern slavery. This framework will be monitored and reviewed by our Critical Risk Management Team to ensure ongoing assessment and improvements. The Critical Risk Management Team is responsible for identifying any risks within the business including modern slavery, and is comprised of the General Manager of Operations, Business Risk and Compliance Manager, Human Resources Manager, Commercial Business Manager, and the Contracts Manager.

Supporting the modern slavery framework, Elastomers Australia has developed a new suite of policies that provide ethical standards and outline our commitment to anti-modern slavery, including:

- Business Integrity Policy
- Ethical Sourcing & Modern Slavery Policy
- Supplier Code of Conduct Policy.

We have also made updates to the existing Code of Conduct to include Elastomers Australia's behavioural expectations around corporate governance, covering topics related to modern slavery, including human rights, labour rights and fair work.

Training & Awareness

Improving awareness is a critical step in identifying and addressing modern slavery risk. Any individual engaged by Elastomers Australia to perform work as an employee or contractor is required to undergo a Company induction, which involves a review and sign off the Code of Conduct policy.

Training on our Code of Conduct policy is conducted on a yearly basis via our online Human Resources Information System (HRIS) to ensure staff are reminded of their obligations relating to corporate governance.

Reporting & Remediation

We maintain a confidential process where employees, suppliers, customers, and any other stakeholder can report instances of actual or suspected unethical or unlawful conduct.

Concerns are reported through our Chain of Command and matters are dealt with by the Human Resources department and General Manager. Any risks are reported to the regulator if required.

Effectiveness of the actions

At this early stage, we are unable to adequately assess the effectiveness of measures we have undertaken. However, we have commenced and will continue to work on developing frameworks and processes to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains.

4. Looking Forward & Continuous Improvement

Elastomers Australia is committed to continuously improving its approach to addressing modern slavery risk in its operations and supply chain. We will continue to build on the work completed during this reporting year and further progress our actions.

In FY24, Elastomers Australia will focus on the following actions:

Operational Risk Assessment:

Elastomers Australia will conduct a risk assessment of our operations to understand where we might be causing, contributing to, or directly linking ourselves to modern slavery practices.

Training & awareness:

We will enhance modern slavery education for our leaders and staff by developing and implementing modern slavery specific training, to improve how we assess, report, and interpret modern slavery risk and how we can strengthen our staff's understanding and identification of modern slavery risk.

Policies & Governance:

We will continue to review and update our policies to consider more explicit references and explanations with respect to identifying, investigating, and addressing modern slavery risks and to enable our stakeholders to report instances of actual or suspected unethical or unlawful conduct without fear of retribution or reprisals.

Our commitment and expectations regarding mitigating modern slavery risks will be communicated across the business and driven from the Board of Directors.

5. Approval

This statement was approved by the Board of the trustee (principal governing body) for RJ Letten Trust on 6th December 2023.

This statement was approved and signed by Georgia Letten as a Director of the Trustee for the RJ Letten Trust.



Georgia Letten

Director

Trustee – Lettela Pty Ltd.

6th December 2023