



***Elastomers Australia Modern Slavery Statement***

For the Financial Year ended 30 June 2024

## A message from the General Manager of Elastomers Australia

In compliance with the Australian *Modern Slavery Act 2018 (Cth)* (**the Act**), Elastomers Australia is proud to present its FY2024 Modern Slavery Statement.

Elastomers Australia continues 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.

Since the last reporting period, Elastomers Australia has undertaken actions in line with our roadmap, these included;

- Implementation of a suite of policies to support our Modern Slavery framework
- Senior Management Team underwent training by third party in Modern Slavery and obligations
- Workforce has undergone Modern Slavery training and awareness including training on the policies supporting the Modern Slavery framework
- Broad brush risk assessment conducted of top ten suppliers to Elastomers Australia

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. Elastomers Australia 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.

Elastomers Australia is committed to acting ethically and with integrity in all our business dealings and relationships by implementing and enforcing effective systems and controls to prevent modern slavery within our own business operations and in our supply chains.

Elastomers Australia also understands that the key to eradicating this complex issue is to set clear expectations for our people and suppliers, which will alert us to potential involvement in modern slavery and empower us to take steps to address it and to prevent such involvement in the future.

*Paul Lane*

Paul Lane

General Manager Operations

Approved by the Board on the 11<sup>th</sup> December 2024

## 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 2023 to 30 June 2024, pursuant to the Australian *Modern Slavery Act (2018)* and was approved by the Board of Directors on the 11<sup>th</sup> December 2024.

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 out 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 2023 to 30 June 2024.

## 2. Structure, Operations & Supply Chains

### Criteria 2 & 6

#### Structure and Operations:

Elastomers Australia is an 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 products 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:

1. Panels (of specific height, width & length dimensions) that are designed to allow ore particles to be separated into size, and
2. 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 identification of 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 overseas customers.

#### Supply Chain:

Elastomers' supply chain encompasses approximately 155 suppliers. The top 10 suppliers spend equals \$52.6m per annum, and 95% of the total spend is on raw materials and consumables. 99.8% of the total spend encompasses our Australian suppliers.

The top spend categories for FY24 were:

- Stainless Steel
- Polyurethanes
- Rubber
- Freight, and
- Workforce labour hire.

## 3. Modern Slavery

### Criteria 3, 4, 5

This statement marks the continuation of Elastomers Australia's journey to understanding modern slavery risks and highlighting what role our business plays to detect and support victims of modern slavery.

Elastomers Australia has available external consultants to help the business understand the issue of modern slavery and enhance our organisation's identification and mitigation of modern slavery risk when needed.

**Operations:**

Elastomers workers fall into two categories:

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

Elastomers' 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 individual 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 license where applicable, is abiding by the terms and conditions of the engagement contract, and ensuring employees are meeting minimum entitlements. Further, when engaging with labour hire agencies, Elastomers Australia incorporates checks in our recruitment process to ensure we have cross-referenced working rights.

It should be noted that all personnel directly working for Elastomers Australia undergo an induction process that includes education on modern slavery risks and whistleblower processes.

**Supply Chain:**

Approximately 99.4% of Elastomers' 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 95% of our total FY24 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.

Through the current risk mitigation process, Elastomers Australia has identified the areas of risk relating to lack of visibility in certain overseas markets. 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 currently underway through a risk management process to assess areas of vulnerability in our supply chains and to understand, identify and control any risks we may encounter. Further clarification of these potential risks will be ascertained through communications with our primary suppliers as well as the actions arising through the Elastomers Australia Broad Brush Risk Assessment of our top 10 suppliers.

## **4. Call to Action - 2024**

**Policies & Governance:**

Elastomers Australia has maintained a modern slavery framework which outlines the key actions, deliverables, and accountabilities of Elastomers Australia in relation identifying and mitigating the risk of modern slavery. This framework is 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, IT and Systems Manager and the Contracts Manager.

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

- Business Integrity Policy
- Human Rights Policy
- Code of Conduct Policy.

These policies were endorsed and approved by the Senior Management Team and communicated to the workforce through the Elastomers Australia learning platform.

### **Training & Awareness**

Improving awareness is a critical step in identifying and addressing modern slavery risks. Any individual engaged by Elastomers to perform work as an employee or contractor is required to undergo a Company induction. As part of the Company induction the following is reviewed by each individual with a sign off of their commitment:

- Previous year's Modern Slavery Statement
- Modern Slavery Training presentation
- Human Rights Policy
- Business Integrity Policy
- Code of Conduct

Training on our policies, procedures and processes 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.

On the 7<sup>th</sup> of February 2024, the Elastomers Australia Senior Management Team underwent Modern Slavery training developed and presented by Deloitte.

### **Operational Risk Assessment**

During the FY 2024 reporting period Elastomers Australia undertook a Broad-Brush Risk Assessment on the Top 10 suppliers by spend with further actions identified to control any risk (even though it is low risk). These actions form part of the FY 2025 continual improvements.

### **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 the General Manager. Any risks are reported to the regulator if required.

### **Effectiveness of the actions**

Currently, in these early stages, we are finding the education of our staff has been effective with follow up questions undertaken to gauge the effectiveness of the presentations. Elastomers Australia 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.

## 5. 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 FY25, Elastomers Australia will focus on the following actions:

### **Risk Mitigation**

Further develop actions and controls outlined in the Broad-Brush Risk Assessment undertaken in FY24. Following the identification of high-risk suppliers from the Broad-Brush Risk Assessment, Elastomers Australia will conduct Supplier Due Diligence and explore modern slavery risks from the perspectives of these suppliers.

### **Training & Education**

Internally Elastomers Australia will develop and implement a document for Domain considerations for modern slavery risks for each Senior Manager.

Externally we will continue the process of educating Elastomers Australia's suppliers and the wider supply chain through communication and information gathering exercises to ensure our suppliers practice responsible and ethical business practices and sourcing, and the implementation of a Supplier Code of Conduct.

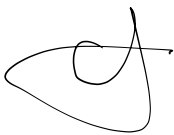
### **Effectiveness of Actions**

Further development of processes for information gathering/reporting and establishment into the business modelling of Elastomers Australia.

## 6. Approval

This statement was approved by the Board of the trustee (principal governing body) for RJ Letten Trust on the 11<sup>th</sup> December 2024.

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*

*11<sup>th</sup> December 2024*