

MODERN SLAVERY POLICY

Objective

As a responsible corporate citizen actively involved in Australia's mineral resources industry, Trinity Mining Services and Supplies supports the aims of the Modern Slavery Act in seeking to eradicate instances of Modern Slavery in Australia and throughout global supply chains.

Trinity MSAS adopts this policy to promote these aims within its own organisation, to ensure compliance with the aims of the legislation, and to encourage and assist its Suppliers in adopting these measures as well.

Definitions

Where used in this policy, these terms have the following meaning:

- Laws means all relevant and applicable local legislation, regulations, legislated standards and industrial award agreements.
- Modern Slavery Act means the Modern Slavery Act 2018 (Cth);
- Modern Slavery means exploitative practices which include:
 - human trafficking;
 - slavery;
 - servitude;
 - forced labour;
 - debt bondage;
 - forced marriage; and
 - the worst forms of child labour.
- Supplier or Suppliers mean any individual, business or entity engaged by Trinity MSAS to provide goods and/or services.

Policy

Trinity MSAS shall:

- Engage in hiring and employment practices strictly in accordance with all Laws. These include:
 - Complying with all relevant Laws with respect to minimum employment entitlements such as any applicable minimum wage, applicable leave entitlements and employment separation rights and entitlements;
 - Complying with all relevant anti-discrimination Laws whilst hiring new employees and during ongoing employment; and
 - Refraining from engaging child labour in contravention of local Laws and conducting due diligence during any hiring process to ensure all employees are of legal age to work.
- Ensure all employees are provided with an understandable written employment contract or other written instrument of employment clearly setting out all legally required terms and conditions of employment;

- Adopt and maintain a transparent grievance complaints procedure for its personnel;
- Maintain appropriate and accurate employment and payroll records for audit, compliance and verification purposes;
- Regularly review policies, practices and procedures to ensure ongoing compliance with all relevant Laws and best practice; and
- Conduct suitable due diligence on existing and potential Suppliers to assess the potential risk for Modern Slavery within operations and risk mitigation measures which are in place.

Trinity MSAS shall work with its Suppliers to adopt policies, procedures, practices and standards which meet or exceed those set out in this policy.

This includes:

- Working with Suppliers to identify Modern Slavery risks within the supply chain and encouraging Suppliers to adopt appropriate strategies to eliminate those risks;
- Using pre-contractual due diligence (pre-qualification) processes to identify Modern Slavery risks in respect of potential Suppliers;
- Where practicable, preferencing Suppliers who are deemed to comply with anti-slavery measures.
- Where practicable, including in Supplier contracts:
 - o obligations on Suppliers to comply with all relevant local Laws;
 - o obligations on Suppliers to refrain from the use of forced or child labour;
 - o the right for Trinity MSAS to terminate any contracts or arrangements with any Suppliers who are found to have breached relevant local Laws.
- Regularly monitoring Suppliers through Supplier assessment processes for compliance with these measures.



Steven Olivier
Chief Executive Officer