

# Big Ben Holdings

## Modern Slavery Statement 2023



THE  
*Bloomfield*  
GROUP

WE CARE. WE DELIVER.

# Contents

Our Approach	3
Our Structure, Operations and Supply Chains	5
Risk Assessment and Mitigation	6
Looking Forward	7
Modern Slavery Statement Approval	8





## Our Approach

Our company Values: **WE CARE. WE DELIVER.** underpin our commitment to the safety and wellbeing of our people, our local community and the environment. We believe that all people involved in our operations and supply chain should be free from modern slavery.

Our Modern Slavery Statement has been developed in accordance with our company Values and the Modern Slavery Act 2018 (Cth) 'the **Act**'. We will be providing periodic statements in line with our corporate governance commitments. Our Modern Slavery Statement sets out the process and actions we have taken to assess and address risks of modern slavery practices in our operations and supply chains for the year ending 31 March 2023 (YEM23).



### Key Areas of Action

- ✓ Additional risk mitigation strategies related to the engagement of overseas team members to work in our PWG King & Sons Pty Ltd (Kings Engineering) business were implemented. Strategies were developed to make sure that our new and existing team members feel safe and supported during the change while reducing modern slavery risks
- ✓ COVID-19 steering committee continued to manage the Group's response and implemented a range of measures to continue to maintain the health and safety of our workforce, the resilience of our business and the businesses that we work with, whilst mitigating potential modern slavery risk
- ✓ The procurement team and contract owners continued to conduct targeted performance reviews with relevant suppliers and maintained regular supplier engagement with other suppliers
- ✓ Review and continuous improvement of Policies and Systems related to human rights
- ✓ The Modern Slavery Risk Review Committee continued to drive the Group's modern slavery response including reviewing best practice guidance and conducting our annual modern slavery risk review



# Our Structure, Operations and Supply Chains

Big Ben Holdings Pty Ltd (ABN 63 008 434 562) (**‘BBH’**) is the head company of a consolidated tax group of companies which, taken together or individually, are commonly referred to in the Hunter Valley as “The Bloomfield Group”. The Bloomfield Group is a proud and successful Australian mining and engineering group. Australian owned and operated, we have been part of the community for more than 80 years and now employ hundreds of local people.

Our success has been built on a simple desire to seek excellence in all we do, respecting our history as we shape our future. Our company values underpin our approach: **WE CARE. WE DELIVER.**

We respect and **care** about the safety and wellbeing of our people, our local community and the environment. We work together with integrity to **deliver** safety, operational best practice, customer satisfaction and compliance.

There has been limited change to our structure, operations and supply chains during the reporting period and no negative impact on our modern slavery risk profile.

This Modern Slavery Statement is made by BBH as a reporting entity in compliance with the Act and on behalf of its related bodies corporate as defined by the Corporations Act.

The following entities are included:

## **MINING**

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Northern Waggons Pty Ltd

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Bloomfield Collieries Pty Ltd

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Rix's Creek Pty Ltd

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Goonbri Coal Company Pty Ltd

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Curlewis Coal & Coke Pty Ltd

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Genesis Coal Resources Pty Ltd

## **ENGINEERING & OTHER ENTITIES**

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Four Mile Pty Ltd

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PWG King & Sons Pty Ltd

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Four Mile Management Services Pty Ltd

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McDougalls Hill Development Holdings Pty Ltd

**(“the Group Companies”)**

The Boards of each of the Group Companies comprise one or more of the Directors of BBH and consultation between the Group Companies required by the Act occurs at BBH's board meetings.

## About us



The Group's main business is mining and engineering. Mining activities include the extraction of coal by open cut truck and excavator mining methods, beneficiation of thermal and semi-soft coal and loading the coal onto rail for transport to Port Waratah where the coal is loaded onto vessels for sea-borne transport to our Asian customers. Title to the coal passes to the customers when it is loaded onto the vessels.

Our engineering business provides general engineering solutions to Australian customers across a range of industries including; mining, tunnelling and infrastructure, rail and manufacturing.

The Group engages approximately 750 suppliers who provide goods and services across a number of different areas including: labour, plant and equipment, consumables, components, clothing and PPE.

Because we aim to develop relationships with local suppliers, our suppliers are predominantly Hunter Valley based companies. Most of the Group Companies have no direct external interfaces or supply chain themselves. In these cases, any contracts and purchases are executed by Four Mile Pty Ltd such that the supply chain for Four Mile Pty Ltd is effectively the supply chain for the Group Companies.

Our website [bloomcoll.com.au](http://bloomcoll.com.au) provides further detail on our operations.

## Our Key Policies

Our values **WE CARE. WE DELIVER.** are embedded in our key policies and underpin our commitment to human rights.

### Key Policies and Management Systems that relate to human rights include:

- ▶ Code of Business Conduct;
- ▶ Health, Safety and Welfare Policy;
- ▶ People Policy;
- ▶ Risk Management Policy;
- ▶ Environment Policy; and
- ▶ Whistleblower Management System.

# Risk Assessment and Mitigation

Our approach to modern slavery risk assessment and mitigation is supported by our belief that all people involved in our operations and supply chain should be free from modern slavery.

During the reporting period, the Group's cross functional Modern Slavery Risk Review Committee continued to drive the Group's modern slavery response including reviewing best practice guidance and conducting our annual modern slavery risk review across our operations and supply chains. The Committee considered any changes that occurred throughout the Group's operations and supply chains and risk ranked our current controls against key risk indicators for modern slavery across four (4) risk areas - sector and industry risks, product and service risks, geographic risks and entity risks.

The risk review determined that the modern slavery risk across the Group's operations and supply chains remains low. The Group maintains its operational base in NSW. According to the Global Slavery Index 2018, Australia has a low prevalence of modern slavery risks (0.6 per 1000 population) in relation to other countries globally.

The key change identified to the Group's modern slavery risk profile is our planned engagement of overseas tradesperson team members to work in our Kings Engineering business. Additional risk mitigation strategies were implemented, and are ongoing, to make sure that our new and existing team members feel safe and supported during the change while reducing modern slavery risks.

## The additional risk mitigation strategies included:

- ▶ Reference checking of overseas recruitment company and migration agent to confirm their adherence to the Act and confirmation that they do not charge recruitment fees to prospective team members
- ▶ Contractual obligations for suppliers outlining adherence to the Act
- ▶ Relevant operational managers from employing entity and Modern Slavery Project Coordinator attended the Philippines to assess controls related to modern slavery and the wellbeing of prospective team members
- ▶ Risk assessment completed on the introduction of our new team members with actions identified and implemented to reduce modern slavery risk

Our clothing and PPE suppliers were identified as requiring additional controls. We have continued to obtain Manufacturer Compliance Statements from our clothing and PPE suppliers, as this was identified in the risk review as a strategy to mitigate potential modern slavery risk. This aligns with the Global Slavery Index report that identifies garment supply as one of the top five (5) imported products at risk of modern slavery.

The risk review process identified that we continue to have strong controls in place that mitigate a range of modern slavery risks. These controls include but are not limited to our Values, Policies and Management Systems and our adherence to relevant Australian legislation concerning safety, employment and industrial relations and the environment.

## Steps that we have taken during the period to further mitigate modern slavery risks include;

- ✓ Additional risk mitigation strategies related to the engagement of overseas team members to work in our Kings Engineering business were implemented. Strategies were developed to make sure that our new and existing team members feel safe and supported during the change while reducing modern slavery risks
- ✓ A COVID-19 steering committee continued to manage the Group's response and implemented a range of measures to continue to maintain the health and safety of our workforce, the resilience of our business and the businesses that we work with, whilst mitigating potential modern slavery risk
- ✓ The procurement team and contract owners continued to conduct targeted performance reviews with relevant suppliers and maintained regular supplier engagement with other suppliers
- ✓ Review and continuous improvement of Policies and Systems related to human rights
- ✓ The Modern Slavery Risk Review Committee continued to drive the Group's modern slavery response including reviewing best practice guidance and conducting our annual modern slavery risk review

The effectiveness of current and future controls implemented has been and will continue to be assessed by the Group, on an ongoing and annual basis. This assessment is managed through the Modern Slavery Risk Review Committee which reports to the relevant Boards.

As part of the Group's commitment to reducing modern slavery risks in our operations and supply chain, consultation is undertaken with the relevant Board on an annual basis.

# Looking Forward

Whilst the Group has again identified that the modern slavery risk across our operations and supply chains remains low, we recognise that efforts in relation to reducing modern slavery require us to continuously review and improve our practices.

Looking forward, the Modern Slavery Risk Review Committee recognised that there has been a significant shift in the labour market locally, which has seen the Group look to engage overseas team members for the first time. The Group acknowledged that tight labour market is also impacting on our suppliers being able to deliver on expectations. Given this, it was recognised that we would seek to review our controls around suppliers engaging overseas labour including how the Group can get assurance that the supplier has adequately assessed and addressed modern slavery risks as we have done internally.

Internally, we will be implementing an ongoing welfare check program for our overseas team members to allow us to review, action and report on any issues affecting safety, wellbeing or modern slavery risks.

The Group will continue to review, assess and address modern slavery risks through our Modern Slavery Risk Review Committee.





# Modern Slavery Statement Approval

As required by the Act, this statement has been reviewed by and approved by the Big Ben Holdings board as the principal governing body of the reporting entity and signed by its Chairman.

**John Richards**  
Chairman

20 April 2023





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