



## QMETCO PTY LTD MODERN SLAVERY STATEMENT

QMetco Pty Ltd and its operating subsidiary (QMetco) are committed to taking the issue of modern slavery seriously, including identifying, assessing, and mitigating modern slavery risks in our operations and supply chains, by being compliant with all modern slavery legislation and by using our commercial leverage to reduce and contribute towards the elimination of modern slavery.

Forms of modern slavery include (but are not limited to) people trafficking, slavery, forced marriage/labour, child labour, debt bondage, servitude, and deceptive recruiting for labour or services are a violation of human rights, against the law and are completely at odds with the Company's Core Values:

- No Games,
- Be Resourceful,
- Care & Respect,
- Deliver Together,
- Challenge the Norm.

QMetco expects our employees, contractors, suppliers, and business partners to:

- comply with all applicable laws, awards and agreements relating to the employment of their workers and modern slavery;
- take steps to identify, address and mitigate modern slavery existing in their operations and supply chains; and
- be transparent about modern slavery risks or occurrences, including by answering relevant questions and providing relevant information when reasonably requested.

### Identification of Reporting Entities

Principal Governing Entity: QMetco Pty Ltd ABN 98 008 124 025

Reporting Entity: Foxleigh Coal Pty Ltd ABN 24 125 986 549 (subsidiary)

This is a joint statement for QMetco Pty Ltd and its subsidiary.

# MODERN SLAVERY REPORT 2024

## QMetco structure, operations, and supply chains

QMetco is a privately owned company incorporated under the Corporations Act 2001.

There is one operating asset, being the Foxleigh Coal mine in central Queensland, with a small head office in Brisbane.

The mine is operated by, a subsidiary, Foxleigh Management Pty Ltd (FoxMan) on behalf of an unincorporated Joint Venture (JV) comprising:

- Foxleigh Coal Pty Ltd (FoxCoal) (70%) – subsidiary and reporting entity
- POSCO Australia Pty Ltd (20%)
- Nippon Steel Australia Pty Ltd (10%)

Other non-operating assets are in Canada and the United States.

QMetco supply chain relates to procurement of good and services to operate a coal mine with the following general expenditure categories:

- Mining equipment
- Explosives
- Diesel fuel
- Mining consumables
- Labour and other contract services
- Maintenance services
- Port and Rail access
- Water and Electricity supply
- Finance, insurance, and other professional services

## Risks of modern slavery in operations and supply chains

QMetco operations are carried out entirely within Australia and all employees are engaged on terms and conditions which comply with Australian laws and are free to join and be represented by unions.

Most procurement items are sourced from suppliers which are Australian based or have operations within Australia and operate under Australian laws. For the most part, these organisations have sophisticated supply chain policies and procedures in place.

However, some organisations tend to have long supply chains in multiple countries, and we acknowledge that modern slavery

risks can be present further down these supply chains. We expect increasing visibility into the actions taken by these suppliers as they move to report in accordance with the requirements of the Modern Slavery Act 2018 (Cwth).

QMetco undertook targeted risk assessments of modern slavery risks in our operations and supply chain over the current 2024 and previous reporting periods to consider:

- i. Specific high-risk activities / supplies from a modern slavery perspective (i.e. boots / shirts / gloves supply – all subject to low cost, international manufacture);
- ii. Major suppliers' compliance with Modern Slavery requirements – i.e. accessible Modern Slavery Statements in place;
- iii. Activity associated with the insourcing of the coal haulage – review of contractors / suppliers engaged to support insourcing of Coal Haulage; and
- iv. the risks that we are causing, contributing, or directly linked to modern slavery practices.

Following this assessment, areas of vulnerability in our operations were found to include offshore manufacturing of low-cost supplies and subcontract arrangements.

From this process, QMetco obtained satisfactory responses from the suppliers of these products and services in the form of modern slavery statements and/or policy documents.

QMetco supports local businesses and contractors within regional communities for minor procurement of goods and services, which operate under Australian laws and may not have extensive supply chains procedures.

## Actions taken by QMetco during the reporting period.

QMetco is committed to operating ethically and legally, partnering with suppliers that are aligned

to the values of the company and adhere to the terms of the company's commercial agreements.

The following actions were actions undertaken by QMetco during the reporting period:

1. The QMetco Board approved a Modern Slavery Statement and 2024 report that outlines the company's commitment to addressing modern slavery, expectations of suppliers, employees and business partners and procedures for reporting instances of modern slavery.
2. All new Directors and Senior Leaders, including key procurement personnel undertake on-line Modern Slavery awareness and education.
3. QMetco and FoxMan Risk Committees have Modern Slavery as a standing agenda item.
4. A review was completed in relation to the recently in-sourced coal haulage activity. This review focussed on key suppliers and components that are related to that activity. This review identified that one supplier could not provide a Modern Slavery Statement. This supplier has recently reached the revenue threshold where they are required to have a Modern Slavery Statement in place and are in the process of developing a Modern Slavery Statement.

Date signed 03/09/25

*Gordon Galt*

Gordon Galt (Sep 2, 2025 12:54:27 GMT+10)

Gordon Galt  
**Chair - QMetco Pty Ltd**

*Andrew Boyd*

Andrew Boyd  
**Director – Foxleigh Coal Pty Ltd**

## Measuring Effectiveness

QMetco will measure effectiveness through:

- Presence of the modern slavery risk as a standing item on Risk Committee agendas
- Monitoring key and large suppliers' implementation of Modern Slavery Statements.
- Continue promotion of a greater level of awareness within our business of the nature and risks of modern slavery.

## Consultation with subsidiaries and JV partners

While the Foxleigh JV is not a reporting entity, QMetco, through FoxMan with JV partner support, has added Modern Slavery as a standing agenda item for JV Management Committee meetings and there is a commitment to share statements and actions to promote awareness and learning.

## Approval of Statement and Report

This Statement and Report has been authorised and approved by the QMetco Board which is the principal governing body for the reporting entity named in this statement for the purposes of the Modern Slavery Act 2018 (Cwth).